

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LULAC, et. al.,	)(	
	)(	
<i>Plaintiffs</i>	)(	
	)(	
Eddie Bernice Johnson, Sheila Jackson-Lee	)(	
Alexander Green, and Jasmine	)(	
Crockett	)(	
	)(	
<i>Plaintiff-Intervenors</i>	))	
	)(	
v.	)(	Case No.: EP-21-CV-00259-DCG-
	)(	JES-JVB [Lead Case]
GREG ABBOTT, in his official capacity	)(	
As Governor of Texas, et. al.	)(	
	)(	
<i>Defendants</i>	)(	

**EXHIBITS TO THE FIRST AMENDED COMPLAINT OF PLAINTIFF-  
INTERVENORS EDDIE BERNICE JOHNSON, SHEILA JACKSON-LEE,  
ALEXANDER GREEN, AND JASMINE CROCKETT**

Exhibit	Exhibit Name
A	Letter From Congresswoman Eddie Bernice Johnson to Rep. Todd Hunter.
B	Joint letter from Congresspersons Jackson-Lee and Green to Legislators which is incorporated herein as if fully set forth.
C	Proposed Map C2131 Proposed by Senator Miles and Representative Thompson.

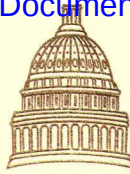
Respectfully Submitted,

/s/ Gary Bledsoe

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## EXHIBIT A



*Eddie Bernice Johnson*  
*Member of Congress*  
*Thirtieth District, Texas*

October 13, 2021

The Honorable Todd Hunter  
Chairman, House Committee on Redistricting  
Texas House of Representatives  
P.O. Box 2910  
Austin, TX 78768

Re: Texas 30<sup>th</sup> Congressional District

Dear Honorable Hunter:

I am a member of the United States Congress, representing Texas' 30<sup>th</sup> Congressional District. My district is about 16,000 above the mean number for Congressional Districts in Texas. I want to keep it largely intact. There is no reason to change the district under current circumstances, and any change should be one that comes from those with understanding of the constituents and the needs that must be met and that includes me as the Congressperson for the 30<sup>th</sup> Congressional District. Last time my district was drawn without my input, and it was cracked and packed in such a way to where courts in Texas and the District of Columbia comprised mostly of Republicans said it was illegal vote dilution.

Please include me in making any decisions about the 30<sup>th</sup> Congressional District. The courts have continually recognized it as a protected African-American opportunity seat and I would like to keep it that way.

I helped establish CD30 from its infancy and though it has been reconfigured many times in the past, in many different lines, I have worked to nourish and develop it through the years, making me uniquely qualified to understand it.

It goes without saying that I know the communities of interest, local political system, the district's economic engines, racial and ethnic groups, diverse businesses, and how they all fit together in ways to uniquely advance the interests of the 30<sup>th</sup> Congressional District. It is my intention to provide you with a map in the not too distant future, though I would appreciate you letting me know of any existing time obligations to provide my recommendations to you.

I know incumbent protection and maintaining cores of districts together are two accepted redistricting principles in Texas and hoping they are applied to my district consistent with the requirements of the Voting Rights Act.

Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Eddie Bernice Johnson". The signature is written in a cursive, flowing style.

Eddie Bernice Johnson  
Member of Congress

## EXHIBIT B

September 29, 2021

The Honorable Joan Huffman  
Chair  
Senate Special Committee on Redistricting  
P.O. Box 12068  
Capitol Station  
Austin, Texas 78711

The Honorable Todd Hunter  
Chairman  
House Committee on Redistricting  
Texas House of Representatives  
P.O. Box 2910  
Austin, Texas 78768

RE: Texas 9<sup>th</sup> and 18<sup>th</sup> Congressional Districts

Honorable Joan Huffman and Honorable Todd Hunter:

As long-serving members of Congress from the 9<sup>th</sup> and 18<sup>th</sup> Districts of Texas, we strongly object to the initial congressional map (C2101) released by the Texas Senate Committee on Redistricting on September 27, 2021.

We base our objection on the following facts:

- Both districts in their present configuration have afforded African American voters the opportunity to elect candidates of their choice for 50 years in the case of the 18<sup>th</sup> District and 30 years for the 9<sup>th</sup> District (being an African-American opportunity district for nearly twenty years).
- Both districts have more than sufficient populations to maintain existing boundaries. The 9<sup>th</sup> District is slightly over the 2020 mean (+3,811) for Texas and the 18<sup>th</sup> District is less than three percent (+29,921) over the average. Very minor adjustments can bring each to the required 766,987 population.
- That being the case, the proposed Senate map unnecessarily removes more than 200,000 residents from these districts, while adding a slightly smaller number of new constituents with no history of being included in a protected district under the 1965 Voting Rights Act as amended in 1975.
- Both existing districts have strong economic engines providing expanding job opportunities for local residents. Notable among these are the Downtown Business District (DBD) and Bush International Airport in the 18<sup>th</sup> District and the Texas Medical Center in the 9<sup>th</sup> District.
- The proposed map moves the aforementioned Downtown Business District from the 18<sup>th</sup> District to an adjacent proposed district with fewer than 12 percent Black residents. Other important assets in the 18<sup>th</sup> District, such as the campuses of Texas Southern University and the University of Houston, are moved by C2101.
- The proposed map radically alters the local congressional map by moving the historic Third Ward and MacGregor areas from the 18<sup>th</sup> District to the 9<sup>th</sup>. That shift that includes the residence and main district offices of Congresswoman Sheila Jackson Lee. No other member of the large Texas delegation is so severely impacted by the proposed map.



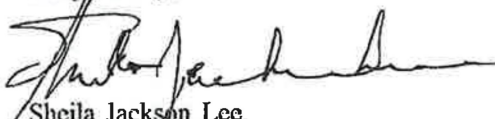
- We also note that for the first time since Barbara Jordan took the 18<sup>th</sup> District seat in January, 1973, the iconic Fifth Ward and Third Ward constituencies have been placed in separate districts with no input from these communities.
- The changes to the Ninth District remove some of the most diverse and fastest growing communities in Fort Bend County, communities with a proven record of supporting the candidates of choice of Black voters. The proposed plan would add a number of new precincts from the City of Pearland in Brazoria County – a community with a history of opposing candidates supported by Black voters.

Currently, Congressional District 9 is almost the optimum size, being a little under 5,000 above the target number. Congressional District 18 is presently slightly above the optimum number for Congressional Districts by a little over 30,000. Last decade, after the State declined to include us in the process, Courts overturned the drawing of both districts as they both were victims of unnecessary surgery. It is essential that we keep the core of our districts together, including its economic engines and communities of interest.

In sum, the C2101 map makes radical and unneeded changes to the two local congressional districts that include the majority of Black voters in Harris and Fort Bend Counties. These changes have been made with no input from the sitting members, nor their constituent populations.

We should note that the 3 Judge Panel that heard the Section 5 challenge to the proposed Congressional Plan adopted by the Texas Legislature in 2011 made it very clear that the 9<sup>th</sup> and 18<sup>th</sup> are both protected African-American opportunity seats, and that they are protected from unnecessary surgery and surgery that takes out important economic engines from these districts as is being done in the current proposed plan. The paring of the two occupants of these districts seems and the unnecessary surgery done on their districts is clearly an act of racial discrimination. We strongly urge the Texas Senate members to reconsider C2101 and restore the performing 9<sup>th</sup> and 18<sup>th</sup> districts that have well served voters of color for decades.

Respectfully,

  
Sheila Jackson Lee,  
Member of Congress  
Texas 18<sup>th</sup> Congressional District

Respectfully,

  
Alexander Green,  
Member of Congress  
Texas 9<sup>th</sup> Congressional District

Cc: Senator Royce West, Member, Senate Committee on Redistricting  
Senator Borris Miles, Member, Texas Legislative Black Caucus  
Vice-Chairwoman Toni Rose, Texas House Redistricting Committee  
Representative Nicole Collier, Chair, Texas Legislative Black Caucus  
Representative Ron Reynolds, 1<sup>st</sup> Vice Chair, Texas Legislative Black Caucus  
Representative Rafael Anchia, Member, Texas House Redistricting Committee  
Representative Craig Goldman, Member, Texas House Redistricting Committee  
Representative Ryan Guillen, Member, Texas House Redistricting Committee  
Representative Jacey Jetton, Member, Texas House Redistricting Committee

Representative Brooks Landgraf, Member, Texas House Redistricting Committee  
Representative Ina Minjarez, Member, Texas House Redistricting Committee  
Representative Joe Moody, Member, Texas House Redistricting Committee  
Representative Geanie Morrison, Member, Texas House Redistricting Committee  
Representative Andrew Murr, Member, Texas House Redistricting Committee  
Representative Mike Schofield, Member, Texas House Redistricting Committee  
Representative Senforia Thompson, Member, Texas House Redistricting Committee  
Representative Chris Turner, Member, Texas House Redistricting Committee  
Representative James White, Member, Texas House Redistricting Committee  
Colleen Garcia, Committee Clerk, Texas House Redistricting Committee  
Senator Royce West, Member, Senate Special Committee on Redistricting  
Mr. Marc Hoskins, Executive Director, Texas Legislative Black Caucus  
Vice-Chair Juan Hinojosa, Senate Special Committee on Redistricting  
Senator Carol Alvarado, Member, Senate Special Committee on Redistricting  
Senator Paul Bettencourt, Member, Senate Special Committee on Redistricting  
Senator Brian Birdwell, Member, Senate Special Committee on Redistricting  
Senator Donna Campbell, Member, Senate Special Committee on Redistricting  
Senator Kelly Hancock, Member, Senate Special Committee on Redistricting  
Senator Bryan Hughes, Member, Senate Special Committee on Redistricting  
Senator Eddie Lucio, Jr., Member, Senate Special Committee on Redistricting  
Senator Robert Nichols, Member, Senate Special Committee on Redistricting  
Senator Angela Paxton, Member, Senate Special Committee on Redistricting  
Senator Charles Perry, Member, Senate Special Committee on Redistricting  
Senator Royce West, Member, Senate Special Committee on Redistricting  
Senator John Whitmire, Member, Senate Special Committee on Redistricting  
Senator Judith Zaffirini, Member, Senate Special Committee on Redistricting



## EXHIBIT C

EXHIBIT D

