UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

JACKSONVILLE BRANCH OF THE NAACP; NORTHSIDE COALITION OF JACKSONVILLE, INC.; ACLU OF FLORIDA NORTHEAST CHAPTER; FLORIDA RISING TOGETHER, INC.; MARCELLA WASHINGTON; INGRID MONTGOMERY; AYESHA FRANKLIN; TIFFANIE ROBERTS; ROSEMARY McCOY; SHELIA SINGLETON; EUNICE BARNUM; JANINE WILLIAMS; HARAKA CARSWELL; and DENNIS BARNUM

Plaintiffs, Case No.: 3:22-cv-493-MMH-LLL

v.

CITY OF JACKSONVILLE and MIKE HOGAN, in his official capacity as Duval County Supervisor of Elections,

Defendants.
_____/

DEFENDANTS' NOTICE OF FILING EXHIBITS

Defendants give notice of filing the following exhibits to Defendants' Submission in Support of Interim Remedial Plan and Reply to Plaintiffs' Corrected Objections and Alternative Plans. Defendants will also provide two courtesy copies of the electronically filed documents to the Court via hand-delivery.

Exhibit	Description	No. of Pages
96-1	November 21, 2022 Status Conference transcript	20
96-2	Declaration of Douglas Johnson	104

Respectfully submitted,

OFFICE OF GENERAL COUNSEL
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of November, 2022, a copy of this document was filed electronically through the CM/ECF system and furnished by email to all counsel of record.

/s/ Mary Margaret Giannini
Counsel for Defendant

where we were in our thinking, and wanting to anticipate that if on the 28th you said we were going to have an evidentiary hearing, being clear as to what evidence should or should not be presented at that hearing so that both sides could be aptly prepared.

THE COURT: I think the difficulty with that is it's a little hard for me to give you-all direction on the scope of a hearing when I haven't seen the parties' arguments.

Obviously I now -- the plaintiffs have filed their submission, and I've read that, and so I understand what you're talking about with regard to some of the arguments about the basis of decisions. But not having seen the response by the City, it's a little hard for me to draw lines and give you-all direction. That's why I was rather perplexed by the filing. But again, given the importance of the matter, I didn't want to simply deny the motion as premature. But I'm not sure what sort of direction I can give, not having seen the arguments.

I guess let me -- Mr. Warren, you identified yourself first. Does that mean you're speaking for the plaintiffs?

MR. WARREN: Yes, Your Honor.

THE COURT: Let me hear from you.

MR. WARREN: Yeah. As -- I mean, we are, of course, prepared to do whatever is helpful for the Court. As we noted in our brief, we don't think an oral argument or hearing is necessary for our case. And we're happy to rest on the four

corners of the paper record.

If the City is interested in having Dr. Johnson provide a narrative or something like that, in the form of live testimony, I guess, we would suggest that it might be more helpful or would be helpful, instead, to have that in a declaration. And we would not oppose a written declaration from Dr. Johnson. And if that's the case, then it would not be as helpful to have live testimony from him to supplement that.

If Dr. Johnson were to testify live at a hearing, we would suggest having a short deposition to limit the kind of wandering cross that might happen if we weren't able to do that ahead of time, and might also be able to just do deposition designations or some of those, to limit the amount of time in a hearing.

That's where we are right now, I think, with respect to that.

THE COURT: So let me see if I follow. Are you -- are you proposing those as alternatives; that is, either he -- either the City proceed with a declaration from him or that you-all handle it by way of deposition and then submit the deposition designations to the Court?

MR. WARREN: I think those are options if that saves the Court's time or if that's helpful for resolving this more quickly than having a full evidentiary hearing just for the testimony of one witness.

THE COURT: Ms. Giannini, have-you all considered simply proceeding with a declaration from Mr. Johnson?

MS. GIANNINI: Your Honor, that is certainly something we have discussed.

I would want to clarify. I absolutely appreciate that kind of the scope of the joint motion that we field on 11 -- on November 14th certainly has changed given the plaintiffs' declaration or statement that they're not interested in -- or do not need an evidentiary hearing or an oral argument.

When we were discussing previously about what each side can -- was interested in doing, there was not only some discussion about Dr. Johnson and depositions of Dr. Johnson, but potentially other witnesses and other depositions that were going to -- perhaps plaintiffs wanting to do in terms of an evidentiary hearing.

And so certainly now that we know that plaintiffs are not interested in an evidentiary hearing or even an oral argument before the Court, it does change our position, because if they had asked for that in their filing, then I think we would have all been in a position of trying to determine what is the nature of the evidence that we're putting forth before the Court.

While we certainly can consider and certainly will do what you direct us to do, I do think that Dr. Johnson's

1 credibility could be best determined live by you, and so that
2 is the reason why we think having him present in the court to
3 explain the many steps he went through and the intricacies of
4 the map process would be valuable.
5 And I appreciate that given you not having seen our
6 filings yet, giving some absolute direction is -- is difficult
7 at this point. I think if plaintiffs had asked for an
8 evidentiary hearing or an oral argument we might have been in a
9 slightly different place about talking about what they wanted
10 to present, what we wanted to present. Now it is entirely what
11 the City would like to try to accomplish. And it is important
12 for us for you to understand what Dr. Johnson did in the
13 process to refute arguments raised by the plaintiffs in their
14 filing.
15 THE COURT: Well, and of course, I tried to give
16 you-all as much time as possible for the map-drawing process
17 and for objections and responses. But what that means is by
18 the time the City files its responses on December 28th, there's
19 not much time at all left for the Court to rule if I'm to rule
20 by the stated date of December 16th.
21 And so scheduling an evidentiary hearing in that time
22 frame would, I think, be fairly challenging. And I would
23 certainly -- I mean, certainly if we need to do it we will do
24 it. But if there isn't a need and it can be resolved based on
25 the declarations or the papers, that might be the better course

of action. But again, it's hard for me to know at this point.

Certainly I would think that you would want to include a declaration from Mr. Johnson because I think, as you say, you want to address some of the arguments that were raised by the plaintiffs. But until I've -- until I've read your filing, I don't know that I can determine a date for an evidentiary hearing.

I suppose I could go ahead and have you-all reserve a day or a time for the hearing, although I'll tell you, it's going to be a bit of a challenge.

Just a moment.

MR. WARREN: Your Honor, may I note something in response to what Ms. Giannini just said?

THE COURT: You may.

MR. WARREN: If the concern is Dr. Johnson's credibility, we have no contest with the credibility of anything he might say in a declaration, or we wouldn't expect to, or anything that he said in the paper record that's already before the Court. And we think the four corners of the paper record has what it needs for the Court to make a decision.

So if that's the sticking point, then I think that may be resolvable without live testimony.

THE COURT: All right. Thank you.

Let me -- I think that -- just a moment. Sorry. I'm looking at the calendar.

I think there's literally one time available because of criminal trials that I have, and that would be Friday morning, December the 9th. I have a hearing in a patent case that afternoon, but -- but I could reserve the morning on December the 9th in the event that an evidentiary hearing is necessary, although I don't know that I -- that I'm terribly persuaded by what I'm hearing today that an evidentiary hearing will be necessary.

If there's no challenge to Mr. Johnson's credibility and if he presents a declaration, it would seem that that would be sufficient. But I'm not going to prejudge the City's arguments. But Ms. Giannini, you will need to explain what the purpose of the evidentiary hearing is.

And I say that not because I am loath to hold a hearing, but that just delays the time in which the arguments are ripe for the Court's consideration. And so if we're having a hearing December 9th and I have to give you-all a decision, which I'm trying to do, by Mr. Hogan's stated date of December 16th -- although if that has to fudge a little, it may just have to fudge a little -- but that just delays it. And unfortunately, the criminal trials I have aren't going to permit me to schedule that hearing even a day earlier. So --

MS. GIANNINI: Sorry, Your Honor.

THE COURT: That's all right. Go ahead, Ms. Giannini.

MS. GIANNINI: So, of course, Your Honor -- and certainly it makes the most sense for you to make a decision as to what you think is best to help you determine the merits of this remedial proceeding upon seeing our filings. And we will absolutely follow your direction and include a declaration from Dr. Johnson and may or may not ask for an evidentiary hearing and trust your -- your determination as to whether or not you think one is needed based on your review of our -- of our pleadings. And we'll reserve the 9th, should it be necessary.

THE COURT: All right. I do think if we end up having a hearing on the 9th that likely that should be an in-person hearing rather than a Zoom hearing. So you'll want to reserve travel time. And I apologize that that's a Friday over the Christmas holidays. I'll probably mess up some holiday schedules, and I'm sorry about that.

Are you-all -- I would be remiss if I didn't say this out loud. Some -- and I've received the plaintiffs' maps. And I want to thank both sides for giving us the blow -ups that make it easier to see the size of the maps. My law clerks and I are very, very grateful for those having been delivered to chambers.

In fact, I had had a conversation -- before the first one was delivered, I'd had a conversation with my law clerk saying, "Do you think we could ask them" -- or, "Do you think we should ask them to deliver those?" And then they just

magically appeared. So thank you-all.

But you've been so accommodating in that that I can't help but ask whether there are any potential discussions between you-all, because as I look at the maps, at least some of them, you're not so dissimilar. And I truly question what the best use of resources is.

And I understand that it's complex when there's a government entity involved, but it does seem to me that the City would be well served, and the constituents, if an agreement could be reached rather than a Court deciding the map.

And as I said, in some respects, and I'm not going to identify specific ones, but in some respects, the maps really don't look that different.

I don't know if either one of you wants to address that comment or if you just want it to sit there like a duck.

Okay. I'm sensing silence.

All right. Well, I think what I've done is I've said aloud what probably a lot of people are thinking, and that is -- and this is true not in this case, this is true in most of the cases that are litigated in federal court -- the parties can always achieve a better and -- a better resolution when they agree amongst themselves than one in which the Court orders, because when you-all agree amongst yourselves, there's some give-and-take on each side. But when the Court rules,

there's generally a clear loser and a clear winner. And I think that certainly the citizenry might be better served if an agreement can be reached. But I understand that that may or may not be possible. And so I'll leave that to you-all to consider your considerations.

I would certainly, though, ask that to the extent it's possible, that you continue any efforts that you have to discuss a possible resolution. And certainly that would also expedite getting a final map.

But let me -- Ms. Giannini, is there anything else that the City wants to address?

MS. GIANNINI: Not at this moment, Your Honor. Thank you.

THE COURT: Mr. Warren?

MR. WARREN: Just two things, Your Honor, real quick.

First, as we noted in our brief, we'll be filing an errata sheet for the transcripts. And we're just finalizing -- everyone's checking everything between the two sides.

And then secondly, not to deflate you and your clerks' joy over the maps, but we've noticed some errors in the Fairfax report. Not huge or substantive, but there's some discrepancies in some of the maps, which actually you might notice some differences between the blown-up maps that we dropped off and the blown-up map versions that are in the ECF-filed version.

We are going to be filing a corrected Fairfax report and explaining the differences, which I think will -- the differences will be fairly straightforward to -- once we lay those all out. And we're expecting that to be filed either tonight or tomorrow.

And we have given defense counsel a heads-up about that as well.

THE COURT: All right. And are they aware of the changes that you're going to be making, or the problems?

MR. WARREN: Not all of them. We're still -- we still have to get the final -- the final -- there may be some things that we're not completely aware of that had ripple effects. We don't think so, but once we do, we'll list all those out and note where there may be differences in the brief itself. And we will deliver paper copies of the updated report as well to the Court.

THE COURT: Okay. So is that going to change the arguments in the --

MR. WARREN: No. It does not change any of the conclusions or arguments in the brief. It may change one number, but it doesn't change the conclusions about -- one number in one page of the brief, but it doesn't change any of the conclusions or arguments.

THE COURT: Okay. And so then are those -- the maps that I have, those blown-up maps, are they inaccurate?

MR. WARREN: They -- they are -- all the blown-up maps you have printed out are accurate except for one very small thing that you may not even be able to notice between two non-challenged districts.

THE COURT: Which two districts?

MR. WARREN: District 3 and District 11. Districts that the plaintiffs did not change from the City's new proposed map.

THE COURT: Okay. All right. So I'll ask you to go ahead and file that by tomorrow so that we know, because to the -- I don't know if it will affect the City's response, but they should have the correct information in the Fairfax report --

MR. WARREN: Yes, ma'am.

THE COURT: -- before they file the response. So if you'll go ahead and do that tomorrow.

And I had made a note about the errata sheets and wanted to give you-all a deadline to agree to those. Can you -- let's see. Can you file those by the day of the government's -- or the City's response, by the 28th?

MR. WARREN: That's -- yeah, Ms. Giannini --

MS. GIANNINI: Yeah, that should -- that's ample time. Thank you, Your Honor.

THE COURT: Okay. So I'll -- I'll just ask you-all to file those, then, by 5 p.m. on November 28th.

All right. And Mr. Warren, was there anything else?

MR. WARREN: That is all, Your Honor. Thank you.

THE COURT: All right. So then we've got by the end of the day tomorrow the plaintiffs are going to file the corrected information with regard to the Fairfax report.

By November 28th the parties will submit the errata sheet.

I have asked the parties to hold the morning of December 9th for a hearing if the Court determines that one is necessary. As of right now there is no -- I haven't -- the plaintiffs haven't requested a hearing, so as of right now you're just holding that time. If the City thinks a hearing is necessary, then the City needs to lay out the need for the hearing, what's to be addressed, and the reason for it. Because again, as I indicated, what that does is it delays -- it delays the Court having all of the information necessary for the Court to make a decision.

And I would direct the City that to the extent you want me -- you want to assure that I hear from Mr. Johnson, that you'll want to file a declaration, because there is no guarantee that the Court will think a hearing is necessary, particularly given the representation by plaintiffs that they aren't going to question the credibility of his representations.

All right. If there's nothing further from the

plaintiffs?

MR. WARREN: No, Your Honor.

THE COURT: No?

And Ms. Giannini, anything further from the defendants?

MS. GIANNINI: No, Your Honor. Thank you.

THE COURT: All right. I hope you-all have a very happy Thanksgiving and I will see you-all soon.

We're in recess.

(Proceedings concluded at 4:48 p.m.)

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CERTIFICATE OF OFFICIAL COURT REPORTER

UNITED STATES DISTRICT COURT)
MIDDLE DISTRICT OF FLORIDA)

I hereby certify that the foregoing transcript is a true and correct computer-aided transcription of my stenotype notes taken at the time and place indicated herein.

DATED this 22nd day of November 2022.

/s/ Katharine M. Healey
Katharine M. Healey, RMR, CRR, FPR-C
Official Court Reporter

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

JACKSONVILLE BRANCH OF THE NAACP; NORTHSIDE COALITION OF JACKSONVILLE, INC.; ACLU OF FLORIDA NORTHEAST CHAPTER; FLORIDA RISING TOGETHER, INC.; MARCELLA WASHINGTON; INGRID MONTGOMERY; AYESHA FRANKLIN; TIFFANIE ROBERTS; ROSEMARY McCOY; SHELIA SINGLETON; EUNICE BARNUM; JANINE WILLIAMS; HARAKA CARSWELL; and DENNIS BARNUM

Plaintiffs, Case No.: 3:22-cv-493-MMH-LLL

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Defendants.
_____/

DECLARATION OF DOUGLAS JOHNSON

1. My name is Douglas Johnson and I submit this declaration pursuant to 28 U.S.C. §1746. I am over the age of 18 and fully competent to make this affidavit. I have personal knowledge of the facts stated herein.

2. In 1992, I graduated from Claremont McKenna College with a Bachelor of Arts in Government/Political Science, and in 1999, I graduated from UCLA Anderson Graduate School of Management with my Master of

Business Administration. In 2015, I graduated from Claremont Graduate University with a Ph.D. in political science.

3. Since 2006, I have been the President of National Demographics Corporation, a company that has been assisting local governments with voting rights analysis and redistricting projects since 1979.

4. I have over 20 years of districting and redistricting experience. Over this time, I have served as: (a) the lead technical consultant to the nation's first independently appointed state redistricting commission in Arizona, (b) an independent mapping expert for the Ohio Redistricting Commission, (c) lead subject matter expert for the 2021 Arizona Independent Redistricting Commission, (d) "Independent Mapping Expert" to the 2021 Ohio State Redistricting Commission; and (e) an expert witness in numerous redistricting cases across the country.

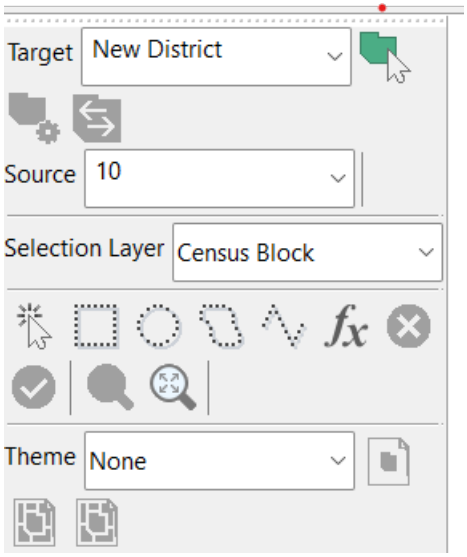
5. I have published numerous studies on districting and redistricting, spoken at numerous conferences and meetings, and have been quoted in hundreds of news articles.

6. A copy of my resume is attached as Exhibit 1.

7. In July 2022, I was retained by the City of Jacksonville (the "City") to provide expert services relating to the allegations of the complaint filed in *NAACP, et al. v. City of Jacksonville, et al.,* to rebut opinions of the Plaintiffs'

15. The heart of the software is the redistricting toolbox, an enlarged version of which is shown as Figure 2:

FIGURE 2: Redistricting Toolbox



16. The "Target" is the district a selected area is being moved into. The "Source" provides the option to limit where population is taken from (in this illustration, only population in District 10 would be selected to move). The "Selection Layer" is the level of geography selected. This is typically Census Block, but could be Block Group, Tract, Census Place, or any other geographic layer in the map. Below "Selection Layer" are the selection tools, which allow the user to select geographic areas to move by (in order) clicking one at a time; drawing a rectangle around the area to be moved; drawing a circle around the to be moved; drawing a jagged polygon; drawing a line (all census blocks touched by the line would be selected); selecting using a formula that selects

geographies based on Census Block data; or clearing the current selection (the "X" in the circle button). The "check mark" in the circle confirms that the selected area should be moved. And the two magnifying glass buttons zoom the map into the current "Target" district (the first magnifying glass) or to the entire map (the second magnifying glass).

17. When the "source" is set to a district that prevents accidentally selecting territory from a 3rd district when trading territory between two districts. The "source" can also be set to "Any District," which allows selecting territory from multiple districts at once. (This difference in options will be revisited in the discussion of the "Fix" maps later in this declaration.)

18. Census data can be reviewed at different geographic levels. The largest is an entire state, followed geographically by counties, Census Tracts, Census Block Groups, and t he smallest level is the Census Blocks. Census Blocks do not have a standardized shape or number of residents. In Jacksonville, the population of the 12,996 Census Blocks vary from 0 to 2,954, with a mean population of 76.6. Census Blocks do not cross the boundaries of counties, cities, or of Census Designated Places, and most Census Blocks do not cross railroads, rivers, major roads. Most Census Blocks also do not cross minor roads. For all of these reasons, Census Blocks are the best available geographic units for redistricting at all levels of government.

19. Censes Blocks combine to make a Bl ock Group. In Duval County, there are 582 Census Block Groups, ranging in population from a single Block Group with 0 population (Block Group 120319900000, which consists entirely of Atlantic Ocean Census Block) to one Block Group with 7,539 people, with a mean population of 1,710. Block Groups do not cross County borders; they sometimes cross city and Census Designated Place borders; and sometimes cross railroads, rivers, major roads and minor roads.

20. Block groups combine into Census Tracts. While Census Blocks and Block Groups may be changed significantly from decade to decade by the Census Bureau , the Bureau nevertheless attempts to preserve Census Tract boundaries over time, with the goal of providing a relatively stable set of geographic areas for researchers to study over time. In Duval County, there are only 219 Census Tracts, with populations ranging from 0 (that same Atlantic Ocean area) to 15,930. The mean population of Census Tracts is 4,545. Census Tracts do not cross County borders, but they reg ularly cross city and Census Designated Place borders, railroads, rivers, and major and minor roads.

21. When creating maps, I start my work at the Census Block level of geography since this is the smallest level and provides the most flexibility to meet the constitutional, statutory, and traditional redistricting requirements and goals.

22. All district boundaries are dictated by the census block boundaries. While I do have the technical capability to divide Census Blocks when vital, any such division requires a shift from official Census population counts to unofficial population estimates, resulting in potential legal jeopardy for the plan and thus I avoid doing so whenever possible. None of the maps involved in Jacksonville redistricting divided any Census Blocks.

23. In creating potential new maps, I focused on the City Council districts, as the School Board districts are simply drawn by combining City Council districts and the City Council districts were the primary focus of the Plaintiffs' complaint and the Court's order.

24. I started by incorporating the unchallenged districts southeast of the St. Johns River – Districts 1, 3, 4, 5, 6, 11 and 13 – and the portion of District 2 southeast of the St. Johns River (as the boundaries of that portion of District 2 are " locked in" by the unchallenged districts' boundaries).

25. From my prior analysis, I realized that the population numbers of the remaining districts would be much more tightly restricted than in typical redistricting projects because all of the uncontested districts were over-populated by between 1.14% and 4.55%. In total, there were 15,114 more people drawn into the uncontested districts than would be included if those districts were perfectly population balanced. Because the total population of the County is a set number, the over-population of the uncontested districts

dictated that the remaining districts would, in total, have to be 15,113 below their population if each was the ideal population. Because the uncontested districts were over- populated, the seven contested districts would have to average 2,159 (or 3.04%) below the county-wide ideal population of 71,112, simply because of the available population in the rest of the County.

26. A further restraint on the population flexibility when redrawing the contested districts was the overall range of population deviation. As noted earlier, the federal requirement is that the overall range be no more than ten percent between the deviation of the largest district and the deviation of the smallest district. Among the uncontested districts (all of which are slightly over-populated) the largest (District 13, at 3,236 over the ideal population) is 4.55% over the ideal. A ten percent difference from 4.55% would be -5.45%, or 3,875.6 individuals. So, none of the redrawn contested districts could be more than 3,875 people, or 5.45%, below the ideal population of 71,112. This "upper bound" on the deviation of the contested districts, combined with the requirement that the contested districts average 2,159 (or 3.04%) below the ideal population, meant for all practical purposes that the population flexibility available when drawing the seven new districts was roughly 5% (from -0.45% to a maximum of - 5.45%), rather than the typical 10% flexibility available when drawing redistricting plans.

27. Most of the redrawn districts in the Council's adopted map have elements resulting from this limitation.

28. An example of population flexibility is the change requested by Council between District 3 and District 11. A small community in the northeast corner of District 11 was geographically isolated in the enjoined map, sitting roughly three miles away from any other District 11 residents and with no roads connecting it to the rest of District 11. The area in question contained 681 residents. Among the seven uncontested districts, District 13 was the largest at 74,348 people. Since the 681 residents in question was a small enough number that they could move from District 11 to District 3 without making either District 3 or District 11 become the largest district, moving these residents had no impact on the overall population balance of the map, nor did the change have any impact on the population flexibility available when redrawing the contested districts – the overall number of people among the contested districts was unchanged (since this change did not involve moving anyone in or out of a contested district) and the population range remained unchanged (since District 13 remained the largest district at 74,348 people). Thus, the change to bring this neighborhood into a district with their neighbors immediately across Highway 202 could be made within the overall map's "population flexibility" and did not require a change elsewhere to offset the population shift. As noted above, when drawing new versions of the

contested districts the available population flexibility was limited to roughly 5% between the largest and smallest of the redrawn districts, rather than the more typical 10%.

29. Once the uncontested portion of the map was drawn, I began looking at ways to draw the contested districts. Given the location of the uncontested districts, the resulting locked-in nature of the southern portion of District 2, and resulting limits on where District 2 could go to get the additional population required to make it a whole district, I started with completing District 2 .

30. The majority of District 2's population is in the southern portion. Specifically, 39,626 District 2 residents are south of the St. Johns River (58% of the District's population in the Adopted Maroon IIIE Fix map).

31. One challenge in creating redistricting maps is that a small change of a proposed boundary can have a ripple effect throughout the other proposed districts. For example, if District 7 takes any significant number of people from District 10, that leaves District 7 over-populated and District 10 under-populated. If there is a simple offsetting shift of another area from Districts 7 to 10 that avoids a "ripple," but often the combination of criteria and priorities in a given map require the population be "rippled" through other districts to balance Districts 7 and 10. In this theoretical example, District 8 could take population from District 7 (balancing District 7), then District 10 could take

population from District 8, "rippling" the population around so that all three districts end up population balanced and in compliance with the other requirements and goals of that map.

32. Once I established a starting point, my initial maps took into consideration typical redistricting criteria including: (1) creating contiguous districts in a logical and compact geographical patter n; (2) following clear geographic and community boundaries such as rivers, major roads, and Citizen Planning Advisory Commission Committee (CPAC) region boundaries; and (3) accounting for the residence of City Council and School Board incumbents to avoid pairing incumbents (and thus forcing them to run against each other).

33. Compactness generally means avoiding bypassing one group of people to include in a district a more distant group of people. More-compact districts often appear more-regular in shape, but rivers, hills and other geographic features can result in non-regular shapes even in compact districts.

34. Compactness can be measured through a variety of different mathematical tests including: (1) Convex Hull; (2) Ehrenburg; (3) length-width; (4) perimeter; (5) Polsby- Popper; (6) Reock; and (7) Schwartzberg. Each of these measures has its strengths and weaknesses, which is why the ultimate rule usually considered is the analysis of whether one group of people are bypassed to get to another group of people. The mathematical measures (along with the humorously-nicknamed "inter -ocular test" – meaning simply how the

district looks) are nonetheless useful by providing an initial "flag" of districts where compactness might be a concern. A poor compactness score (or a district that simply looks oddly-shaped) is a district worthy of investigation into whether that odd shape is caused by a constitutional justification (such as keeping a hillside community together when it is nestled in a series of valleys or following a river) or a potentially unconstitutional justification. If a poor measure or an odd shape is the result of odd-shaped geographic features, an unusually-shaped community of interest, or neighborhoods linked in a visually odd way to meet some other constitutional requirement, statutory requirement or traditional redistricting goal then those higher-priority goals typically justify the less-compact district's shape.

35. The Convex Hull score is a ratio of the area of the district to the area of the minimum convex polygon that can enclose the district's geometry. A district's Convex Hull score is always between 0 and 1, with 1 being the most compact.

36. The Ehrenburg score computes the ratio of the largest inscribed circle divided by the area of the district. A district's Ehrenburg score is always between 0 and 1, with 1 being the most compact.

37. The length- width ratio is calculated as the ratio of the length to the width of the minimum bounding rectangle surrounding the district. A lower number indicates better length-width compactness.

38. The perimeter test computes the sum of the perimeters of all the districts in a plan. The plan with the smallest perimeter is the most compact.

39. The Polsby-Popper score is the ratio of the area of the district to the area of a circle whose circumference is equal to the perimeter of the district. A district's Polsby- Popper score is always between 0 and 1, with 1 being the most compact.

40. The Reock score is the ratio of the area of the district to the area of a minimum bounding circle that encloses the district's geometry. A district's Reock score is always between 0 and 1, with 1 being the most compact.

41. The Schwartzberg score is the ratio of the perimeter of the district to the circumference of a circle whose area is equal to the district. A district's Schwartzberg score is usually greater than or equal to 1, with 1 being the most compact.

42. No one test is definitive of compactness and each test measures slightly different aspects of a district.

43. The mapping program I use can generate the compactness measures I have identified.

44. While drawing the various maps, I strived to draw compact districts within the limitations of the mapping goal at the time. I did not run the mathematical measures of compactness until after the mapping was drawn, but I kept the maps as compact-looking as possible and – most

importantly – avoided bypassing one group of people to include another group of people whenever possible.

45. Traditionally and in my drawing of the City's Council districts, neighborhoods and communities of interest are a higher priority than simple compactness. Neighborhoods and communities of interest can run from very small to very large. The ones that initially were the most evident were the City's CPAC region boundaries. I first found these in a batch of GIS data provided by the City staff, and upon review I found they generally identified areas often mentioned in documents and comments from the initial 2021 redistricting and the subsequent court debate, but I found the CPAC boundaries had a number of advantages over the neighborhoods specifically mentioned during the redistricting debate:

46. The CPAC boundaries were drawn a significant number of years prior to redistricting (though I do not know exactly when), meaning they were highly likely to have been drawn independent of any motive to manipulate the redistricting process; and

47. The Community Planning Advisory Committees are appointed bodies that regularly meet and participate in debates regarding local planning issues, making them both generally- recognized by the community and, by definition, community-of-interest based.

48. What I know of the CPACs I learned from the City's CPAC website[1]. That website describes how these boundaries divide the City into six planning districts to provide for the open and effective communication between Jacksonville residents, businesses, neighborhoods, community organizations, educational institutions and City government. A map showing th e CPAC boundaries is attached as Exhibit 2.

49. The seven CPAC areas are: Northwest, North, Southwest, Baldwin, Greater Arlington/Beaches, Southeast, Urban Core, and Beaches .

50. In looking for additional (and perhaps smaller / more detailed) neighborhood and community of interest boundaries, I found on the City website[2] a description of the various small neighborhoods of the City. The website included a list and a map showing center-points of the neighborhoods, but no map including their boundaries. In discussions with Bill Killingsworth and other City Staff, I learned that the lack of a map of those boundaries was intentional: as I encounter in many jurisdictions where I work, there is no consensus on where the various neighborhoods of the City start and end. The court filings from the debate of the Enjoined Plan confirmed the information on the City's neighborhoods website: there are no City-recognized boundaries

[1] https://www.coj.net/departments/housing -and-neighborhoods/neighborhood -initiatives -(1)/citizen -planning -advisory -committees -(cpacs).aspx

[2] https://www.coj.net/departments/neighborhoods/neighborhood -services-office

of the neighborhoods. Discussions with City Staff about the map Plaintiffs claim represents City neighborhoods confirmed that the map cited by Plaintiffs was not even known about among the City Staff who manage neighborhood relationships and communications, and – as best as City Staff could find out – it is believed to be simply a map developed in 2012 to facilitate placement of after-school programs in the City (and not used for any purpose shortly thereafter).

51. In the absence of an officially debated and recognized neighborhood map – and sometimes in conflict with such a map – in my experience the best definition of a "neighborhood" is whatever the people who live in the neighborhood say is its boundary – but that definition can, and usually does, vary significantly even among the people in that "neighborhood."

52. In my initial maps, I drew the maps to ensure no two Councilmembers (and no two School Board members) ended up in the same district. As the maps evolved through the Committee and Council process, that traditional redistricting goal was revised in two ways: (1) the concern was reduced to ensuring only that those Councilmembers eligible to run again were not paired (a pairing, which would mean a Councilmember either cannot run again or would have to run against another Councilmember to be re-elected, is typically not a concern for a Councilmember who is ineligible to run again); and (2) a relatively small change was made to keep each Councilmember with

the new district that most closely retains the "heart" of their old district (as identified by the Councilmember in the Committee hearing) whenever possible.

53. Note that reason 2 in the paragraph above is significantly different from the "core preservation" goal of the now-enjoined map: while the now-enjoined districts were drawn with the primary goal of preserving as much of the pre-existing district as possible, the new districts were first drawn completely ignoring the pre-existing (and enjoined) districts, and then one small trade was made to the already-drawn map to achieve this goal. Particularly telling to the difference between this goal and the consideration of race in the drawing of the now-enjoined map is that race was not even considered in the drawing of my original maps.

54. I also considered the political makeup of potential districts and geographic and community characteristics linking various neighborhoods together. Examples of these considerations will be discussed below.

55. I was aware that the Court's Order found that racial considerations had likely predominated the map enacted in March 2022.

56. Therefore, I did not consider race while drawing the new maps.

57. Although my mapping program does include race as a potential data that can be viewed on screen (through color shading on the map) or in the

dataview showing the numbers from the various districts as they are drawn, I did not use this data when creating any of the proposed maps.

58. I only looked at the racial data of the districts after the fact to ensure that the proposed district would not unintentionally create any Voting Rights Act ("VRA") issues. The only change in any map resulting from this review was a small (990-person, or 1.4% of a district) shift of population between District 7 and District 10 made in the Maroon IIIE Fix map. In addition to providing a small degree of protection from a potential legal challenge under Section 2 of the VRA if a majority minority district was required, this change also made both District 8 and District 10 more compact and meant the border between them followed Fairfax Street for this entire segment of their border, rather than jogging around on Spires Avenue, 13th Street, Fairfax Street and 19th Street (as they did in the earlier maps up to and including Maroon IIIE).

59. The City had asked if I could do independent racially polarized voting analysis for VRA purposes.

60. The City started gathering the data necessary to conduct the racially polarized voting analysis, however, much of the data was not in an easily usable format and would need to be converted before being able to be analyzed.

61. My team and I did not have enough time to convert the data, conduct the analysis, and create proposed maps in the timeframe given by the Court.

62. Generally, when conducting a VRA analysis, that analysis is done prior to any mapping, or, if that is not possible, as early in the mapping process as possible. If the analysis confirms the existence of a pattern of racially polarized voting, I then use the "effectiveness number" identified by the analysis to guide the drawing of maps. The "effectiveness number" is the demographic value (in Southern states, usually – but not always – the "Any Part Black percentage of Voting Age Population") that identifies when a district becomes heavily enough populated by the protected class to make the district in question likely to elect the preferred candidates of the protected class voters.

63. I did, however, review the expert reports provided by the Plaintiffs which contain their own Voting Rights Act analysis.

64. While I have many questions on the methodology and accurateness of the initial reports of Dr. Imai, Dr. Austin, and Dr. Walker, I utilized the 41% figure Dr. Walker identified as the "effectiveness" number to review whether the maps I created complied with their purported VRA analysis.

65. At the time, there was no way to know that Dr. Imai would, in Dr. Imai's second expert report, make the argument that districts as low as 38.6%

Black (Any Part Voting Age Population) are effective. As set forth below, I have several questions regarding the accurateness of Dr. Imai's expert report.

66. I only looked at these racial percentages on my mapping program after I had completed drawing each map. As noted above, these data were not displayed on screen nor in the dataview during the actual drawing of any map.

67. To look at the racial percentages in Maptitude, I would go into the "Dataview – Show Fields" menu option and add "% AP Blk VAP" to the list of fields displayed in the plan data. After reviewing those numbers, I would then go back into "Dataview – Show Fields" to remove that value prior to continuing with any additional mapping.

68. As discussed in greater detail below, there was only one change to the maps that I felt could be problematic under the Federal Voting Rights Act Section 2 rules. The drawing of "Maroon IIIE Fix" was fine-tuned as the Council met on November 4th. The primary change made in that map was to unite the final piece of the Riverside Historic District in District 10. In that map, I included a very small 990-person change that both made the map more compact and potentially improved the map's defensibility against a potential Section 2 VRA challenge if a majority minority district was required.

69. In addition to consulting with them prior to mapping, throughout the mapping process I worked with Bill Killingsworth, the Director of the City's

Planning and Development Department, and his staff to create and provide the Council with numerous different map options to consider.

70. The City's Planning Department was instrumental in assisting me with the final production of the maps.

71. I would create and finalize the maps on my mapping software, and then send the shapefile for each map to the Planning Department.

72. The Planning Department coordinated the colors on the map so that each District was the same color on each map. The Planning Department would then generate the pdf images of each map.

73. We operated in this manner because I used a different mapping program than the City and this was the most efficient manner to create the maps in the form the Council was accustomed to viewing and to coordinate the colors of the Districts. The City also had the large-format printers that printed the poster-size maps displayed for the public in City Hall during each public meeting.

74. Each of the initial maps I created was intended to provide the Council with different options of what a new plan could look like.

75. I did not, and would not, draw a map that I felt was not defensible in this litigation, or that I felt created new problems that would generate new litigation.

76. On November 1, 2022, I presented four maps to the Special Committee on Redistricting ("Committee"): (1) the Plaintiffs' map that had been introduced at City Council the prior week; (2) the Orange map; (3) the Maroon map; and (4) the Lime map.

77. Some notable features of the Plaintiffs' map were: (1) it switched the political makeup of two of the seven contested districts from Republican to Democrat (Districts 12, and 14); (2) it paired incumbents who could run again against each other; (3) it did not keep incumbents who could run again in separate districts; (4) it combined distant dissimilar areas together, including crossing Interstate 295 to combine dense, urban areas with more sparsely populated rural areas, including Baldwin with Magnolia Gardens and Sherwood Forest in District 12 ; (5) District 10 crossed Interstate 295 to extend east into District 14 and dividing Sweetwater, and then District 14 flipped back across Interstate 295 west into District 10 dividing the east end of Argyle Forest from Chimney Lakes, even though these two areas were almost perfectly equal in population (it appears these changes were made for Plaintiffs' partisan goals, since I-295 could have been followed while maintaining population equality); and (6) it modified the boundaries of unchallenged districts 1 and 3, dividing the north end of Queen's Harbor from the rest of Queen's Harbor, even though the only way to drive in and out of the northern portion is through the southern portion.

78. Another map initially presented to the Committee was the Orange map. A copy of the Orange map is attached as Exhibit 3.

79. The primary changes to Plaintiffs' map made in the Orange map were: (1) returning the political makeup of District 12 to close of that of the current district (though with a different configuration); (2) placing each incumbent who could run again in a separate district; (3) not pairing incumbents against each other; (4) using Interstate 295 as a boundary for several districts, thereby creating more rural and urban districts; (5) using natural boundaries; and (6) restoring the originally-adopted boundaries of unchallenged Districts 1 and 3.

80. These options resulted in District 12 spanning most of Jacksonville's northwest border, crossing into the "North" CPAC area, and being quite large in land mass, covering everything from the southwest border of the City to I-95 and Main Street in the north.

81. Another map initially presented to the Committee was the Maroon map. A copy of the Maroon map is attached as Exhibit 4.

82. With the exception of small areas used for population balancing, the Maroon map: (1) maintained the partisan makeup of Districts 12 and 14; (2) kept similar communities together (rural communities in District 12; communities along the Interstate 295 corridor in District 9; riverfront and newer developments in District 14, the urban core in District 8); (3) used

natural boundaries, includ ing roadways (Interstate 295, Blanding Boulevard, Collins Road), CPAC boundaries (Urban Core and Northwest), and waterways (St. Johns River, Ortega River, Trout River); and (4) did not pair incumbents.

83. A notable feature of the Maroon map was the shape of District 9. I designed the shape of District 9 to take into account a potential option for the Council to consider: what the districts could look like if each current Councilmember remained in their own seat, regardless of whether they were termed out.

84. In the Maroon map, District 9 is drawn primarily to unite the communities along the I-295 corridor. T he northern neck of District 9 is added solely to capture the residence of the most newly elected Councilmember, who had been sworn into office approximately 2 months prior.

85. Another feature of the Maroon map was District 14, which wrapped around the bottom of District 9 to include the Argyle Forest and Chimney Lakes communities.

86. The Chimney Lakes and Argyle Forest areas are relatively new communities and have a large populations.

87. In looking at where to place these areas, I considered both District 9 and District 14.

88. I found that District 9 was focused on uniting the interstate corridor, with both sides of Interstate 295 being similar in residential patterns

and building, as well as economic development. Placing the roughly 25,000 people of the Chimney Lakes and Argyle Forest area into District 9 while keeping the incumbent in the District would require making the district much narrower, dividing those freeway-adjacent communities, and would eliminate the ability to follow major roads (such as Blanding Boulevard) for its boundaries.

89. District 1 4 contained the vast majority of the riverfront population. On their own, these riverfront communities do not have sufficient population to make a complete district. Combining the riverfront community with Chimney Lakes / Argyle Forest community made a complete district. This also kept the partisan makeup of District 14 close to its current (highly competitive) partisan composition.

90. The final map in this initial presen tation to the Committee was the Lime map. A copy of the Lime map is attached as Exhibit 5.

91. The Lime map was based off of the Maroon map, and still followed the redistricting criteria identified above.

92. In the Lime map, only Districts 9, 10, 12 and 14 change from their configurations in the Maroon map. The major change in the Lime map was making District 9 more compact, but in doing so, south of Collins Road Chimney Lakes and Argyle Forest were split into different districts.

93. This change also caused the political makeup of District 14 to switch from a slight Republican advantage to a Democratic district.

94. During this initial presentation to the Committee, when I was explaining the Orange map to the Committee, I was working off of my mapping system rather than the pdf map that had been generated by the City's Planning Department and distributed to Council and the public.

95. Due to technical challenges associated with data exchanges in the shapefiles I sent to the City, some of the district numbers on the Orange map were different between the map I was using for the presentation and the PDF versions of the Orange map at the time it was presented to the Committee.

96. The population numbers provided on the Orange Map for District 10 should were actually for District 7; the population numbers provided for District 7 were actually for District 8; and the population numbers provided for District 8 were actually for District 10. Likewise, any references to Districts 10, 7, and 8, should actually be references to Districts 7, 8, and 10, respectively.

97. The Committee preferred the Maroon and Lime maps and used these as the starting point for its November 2, 2022 meeting.

98. At the November 2, 2022 meeting, the Committee provided direction for me to evaluate whether the district boundaries in the Maroon map could be shifted to accomplish the following: (1) switching the numbers on Districts 7 and 8 and moving the District 8 incumbent's neighborhood north to

pair her with more of the area which the Councilmember already served, and also expand District 9 to include the Woodstock area (the area between Commonwealth Avenue, Cassatt Avenue, Beaver Street and Melson Street); (2) allow for a neighborhood in the northeast corner of District 11 to be included in District 13 or 3 due to easier ingress and egress into that area from Districts 13 and 3; and (3) allow for the historic districts of Avondale and Riverside, and if possible Murray Hill, to be in the same district, either proposed District 8, 10, or 14.

99. A Councilmember also requested that the San Mateo area – which was in proposed District 7 – be moved to District 2 because it was part of a unified neighborhood that was geographically isolated from the rest of proposed District 7 by an industrial area, railroad tracks, and a river. However, no Committee member initially offered this as a motion or recommendation at this time.

100. None of the requests made by the Committee or Councilmembers appeared to be racially motivated and were easily explained by the current circumstances or location of the area . For example, the Councilmember in District 8 – who could run for re-election – wanted to remain more in the area that she was currently serving. And the Councilmember in District 9 wanted to keep neighborhoods united. As it related to the proposed District 11 change, the location of ingress and egress and avoiding the geographical isolation of

neighborhoods are traditional redistricting considerations when drawing district boundaries. Similarly, uniting recognized historic areas (such as Riverside) within the same d istrict is a traditional consideration when creating district boundaries.

101. In response to the Committee's directions, I created three new proposed maps: Maroon IIA, Maroon IIB, and Maroon IIC. Copies of the Mar oon IIA, Maroon IIB, and Maroon IIC maps are attached as Exhibit 6.

102. Each of the new proposed maps was able to accommodate moving the District 11 neighborhood into District 3. And, with minor variations, each of the Maroon II maps was able to shift District 8 northward, with an offsetting population transfer, and include a portion of the Woodstock area in District 9.

103. I did not include all of the area requested by the District 9 Councilmember because it would almost cut the surrounding district (District 10) in half, creating a very odd looking and possibly non-contiguous district. I did not include a map with that configuration, but I did verbally describe the challenge during a Committee meeting.

104. Each of the new proposed Maroon II maps also moved the location of District 7 from the north central part of the City to the southern border.

105. The major change in each of the Maroon II maps was with the Avondale, Riverside and Murray Hill areas.

106. Moving these areas was challenging because of the large population, with Avondale and Riverside having approximately 15,000 residents and Murray Hill approximately 9,500 residents.

107. Maroon IIA combined Avondale, Riverside and Murray Hill in District 14, but resulted in splitting Argyle Forest, the downtown area, and Springfield.

108. Maroon IIB combined Riverside and Avondale in District 14 and put Murray Hill in District 9. This map resulted in splitting Argyle Forest (in particular the Chimney Lakes portion of the larger Argyle Forest community), the downtown area, and Springfield Historic district.

109. Maroon IIC combined Avondale, Riverside and Murray Hill in District 9. This map resulted in splitting downtown and Springfield. There was also a small change on the boundary between District 9 and 10, which was made to improve the defensibility of this map to a potential challenge under Section 2 of the Voting Rights Act. Under the Bartlett v . Strickland ruling (see 129 S.Ct. 1231 (2009)), plaintiffs in a Section 2 case must show they can draw more geographically compact districts where the protected class is a majority of the district. There is much more to a Section 2 challenge, but by making very small population shifts between Districts 9 and 10 on the north side of 20th Street I was able to keep District 9 above 50 percent Black, thus providing a

small increase in the defensibility of the plan against a potential Section 2 challenge if a majority-minority district were to be required.

110. I did not complete a map that included the Avondale and Riverside area in District 8, as requested by the Committee. I attempted to draft such a map, but the districts were not at all compact and resulted in a nearly non-contiguous connection between Avondale/Riverside and the rest of the District. Because the other options for uniting Avondale/Riverside suggested by the Committee provided significantly more compliance with the overall goals of this redistricting, I did not complete it or present it to the Committee.

111. The conclusion of attempting to achieve all of the Committee's requests was that some of the split communities could be adjusted, but because of the very limited population flexibility available, the resulting changes split other communities or similar areas.

112. During the discussion over the Maroon II maps, the Committee expressed concern over the different location of District 7. Part of this concern appeared to be driven by the fact that a new District 7 Councilmember was going to be elected on November 8, 2022, the day the final map was required to be filed with the Court. Because of the dramatic shift of District 7's location in the Maroon II series of maps, neither candidate would live in, or close to, the proposed District 7.

113. Much public comment and Committee concern was also expressed in connection with the splitting of downtown and Springfield into multiple districts.

114. Because of the numerous issues raised by the Maroon II maps, the Committee decided to return to the Maroon map, with the following instructions: (1) attempt to include Avondale and Riverside in District 10; (2) evaluate the data and potential outcomes of including San Mateo in District 2; and (3) allow for a neighborhood in the northeast corner of District 11 to be included in District 13 or 3 due to easier ingress and egress into that area from Districts 13 and 3. There was also discussion about swapping proposed Districts 7 and 8 so that District 8 could contain more of the northern section of Jacksonville.

115. For the same reasons set forth above, none of these requested changes appeared to be racially motivated. (And none had significant impacts on the racial composition of any district).

116. The Committee also decided to include only the residence of those Councilmembers that could run again on future map revisions, removing those that were termed out from consideration. The Committee further asked that I include the residence of the two District 7 candidates running for election the following week (though later in the process both candidates indicated they

were ok not being located in new District 7 if that helped keep together the Urban Core community and closely-related neighborhoods to its north).

117. Other than these two candidates, I did not take the residence of any other potential or declared candidate for upcoming elections into consideration when drawing the proposed maps.

118. On November 4, 2022, I presented the Council with six different options: (1) Maroon IIIA: which including the District 11 change and united Avondale and Riverside in District 10; (2) Maroon IIIB: which included the District 11 change, united Avondale and Riverside in District 10, and included the San Mateo area in District 2; (3) Maroon IIIC: which included the District 11 change, united Avondale and Riverside in District 10, included the San Mateo area in District 2, and switched the numbering of District 7 and 8; (4) Maroon IIID: which included the District 11 change, united Avo ndale and Riverside in District 10, and switched the numbering of District 7 and 8; (5) Maroon IIIE, which included all of the requested changes: the District 11 change, uniting Avondale and Riverside in District 10, switching the numbering of District 7 a nd 8, and partially including the District 9 Councilmember's request for the Woodstock areas in her district, and included the San Mateo area in District 2; and (6) Maroon IIIF, which was the same as Maroon IIIE, but did not include the San Mateo shift to District 2. The Committee requests and maps are summarized in the following table:

FIGURE 3: Maroon III map options

	San Pablo in D3	Riverside/ Avondale united	San Mateo in D2	Pittman D7/D8 Request	(Partial) Carter-Murray neighborhoods request
Maroon	No	No	No	No	No
III a	Yes	Yes	No	No	No
III b	Yes	Yes	Yes	No	No
III c	Yes	Yes	Yes	Yes	No
III d	Yes	Yes	No	Yes	No
III e	Yes	Yes	Yes	Yes	Yes
III f	Yes	Yes	No	Yes	Yes

119. Copies of the Maroon IIIA, Maroon IIIB, Maroon IIIC, Maroon IIID, Maroon IIIE, and Maroon IIIF maps are attached as Exhibit 7.

120. I inadvertently did not include a sliver of the Riverside area in Maroon IIIA, IIIE and IIIF. As discussed above, when I united Riverside I inadvertently had "District 14" as the "Source" District, rather than "Any District," and as a result the very small (but densely populated) District 10 portion of the Riverside Historic District was not united with the rest of Riverside. This concern was noted at the very start of the meeting, and in response I quickly provided Council with revised versions of these maps which were titled Maroon IIIA Fix, Maroon IIIE Fix, and Maroon IIIF Fix.

121. Copies of Maroon IIIA Fix, Maroon IIIE Fix, and Maroon IIIF Fix are attached as Exhibit 8.

122. The Council approved a vote to use the Maroon IIIE Fix map as the starting map to focus on in the discussion of any potential additional changes.

123. While one of the District 7 candidates did not reside in the proposed District 7 area, the Group 2 At Large Councilmember (who initially raised the concern) announced during the meeting that the candidate in question had no objection to the proposed boundary.

124. At one point during the Council meeting, the District 14 Councilmember advised that she had heard that a map could be drawn to include Avondale/Riverside within District 14.

125. I spoke on the phone with the person who advised the Councilmember that this configuration was possible and attempted to include such a change in the Maroon IIIE Fix map. Ultimately, the advisor and the District 14 Councilmember agreed the requested change was not possible without resorting to the original boundaries of one of the challenged districts or significant divisions to other communities.

126. The Council ultimately approved the Maroon IIIE Fix map with a 16-1 vote.

127. Below is a summary of the Maroon IIIE Fix map boundaries.

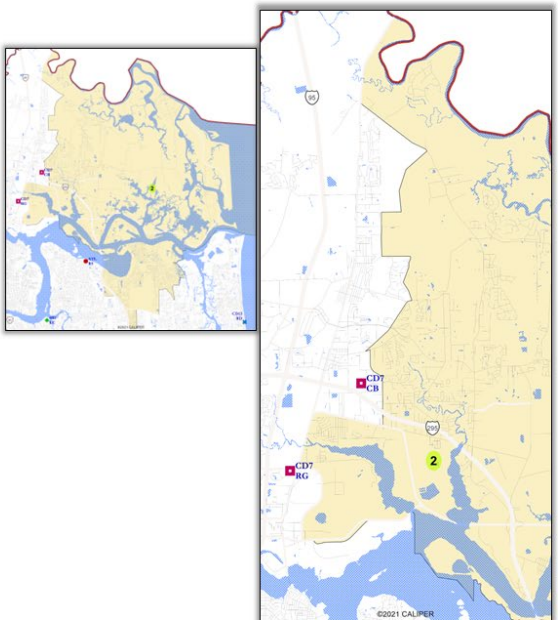
128. None of the Maroon IIIE Fix boundaries were drawn for racial reasons. Rather, as set forth below, reasonable, non-racial reasons exist for the current boundaries.

DISTRICT 2:

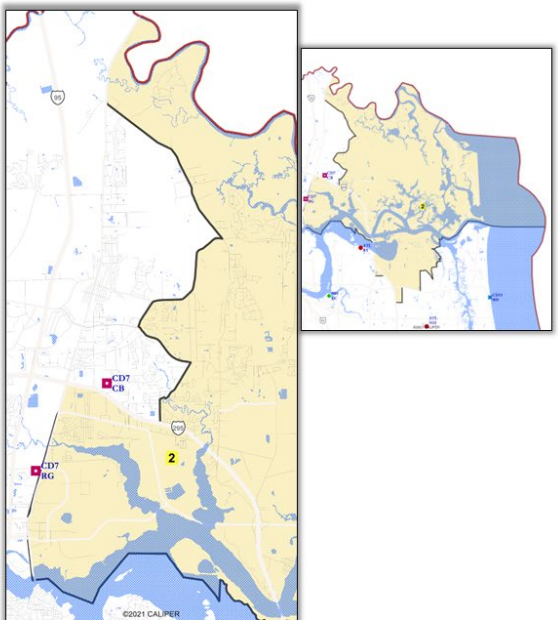
129. Below is a comparison of District 2 in the Enjoined Plan and the Maroon IIIE Fix adopted by the Council.

District 2

Original 2021 Map



Adopted Nov. 4 Map



130. A majority of District 2's population is south of the St. Johns River. The boundaries of this southern section remain untouched.

131. In the Enjoined Plan, District 2 and District 7 shared a boundary. In the Maroon IIIE Fix map, District 2 now primarily shares a border with

District 8, and only a small portion of District 7 along the southern part of the border.

132. The new District 2 border is significantly redrawn. For its boundary south of I -295, District 2 now follows the logical and clear boundaries of the Trout River, Main Street, and I-295.

133. District 2 includes portions of two CPAC's within its boundaries.

134. Only where population-balancing was necessary among the spread-out neighborhoods north of I-295 does the boundary become jagged. This portion is jagged largely because I followed oddly shaped census blocks through the area.

135. By keeping these rough edges north of I-295 for population balancing, the San Mateo area could be within District 2, which is one of the options the Committee requested I evaluate.

136. During the Committee process, numerous emails and public comments were received relating to putting the San Mateo area in District 2. The San Mateo area is a geographically isolated area with its neighboring communities in District 2. If this area were to be including in District 7 or District 8, as it was it some of the earlier maps, it would be geographically isolated from the other communities of the District across large industrial areas and onward across I-95.

137. I did not think that the request to put San Mateo in District 2 was racially motivated. Rather, the San Mateo residents wanted to remain with the neighborhoods with whom they shared similar concerns and interests.

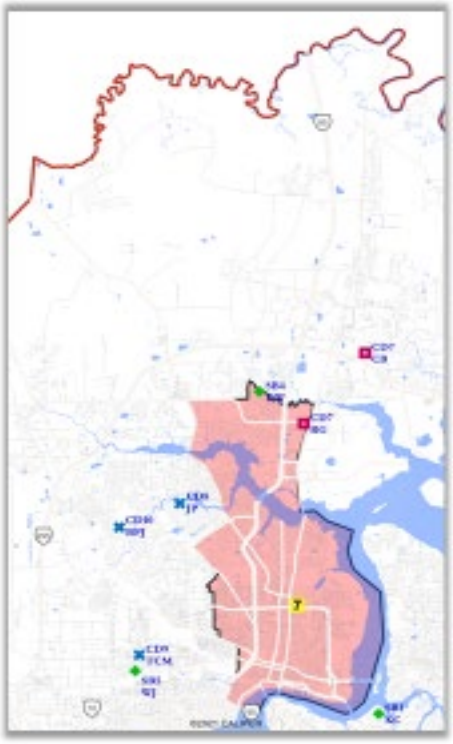
DISTRICT 7:

138. Below is a comparison of District 7 in the Enjoined Plan and the Maroon IIIE Fix adopted by the Council.

District 7

Original 2021 Map

Adopted Nov. 4 Map



139. District 7 is a heavily community focused, densely populated district uniting the historic urban core of Jacksonville.

140. Along its southern border, District 7 largely follows the Urban Core CPAC boundary, with the exception of one small area in the south where the CPAC border divides the Riverside Historic District. Here, the boundary between Districts 7 and 10 are drawn to keep the historic district united.

141. District 7 also maintains the Springfield Historic District within one district. Keeping the historic Springfield area within one district was another concern raised by the Committee and the public after the Maroon II series of maps split the area into two different districts.

142. District 7 includes a small portion of the Northwest CPAC region territory between the Urban Core and the Trout River. These areas are included because of their close geographic connection to the urban core along with sharing similar socio-economic characteristic s.

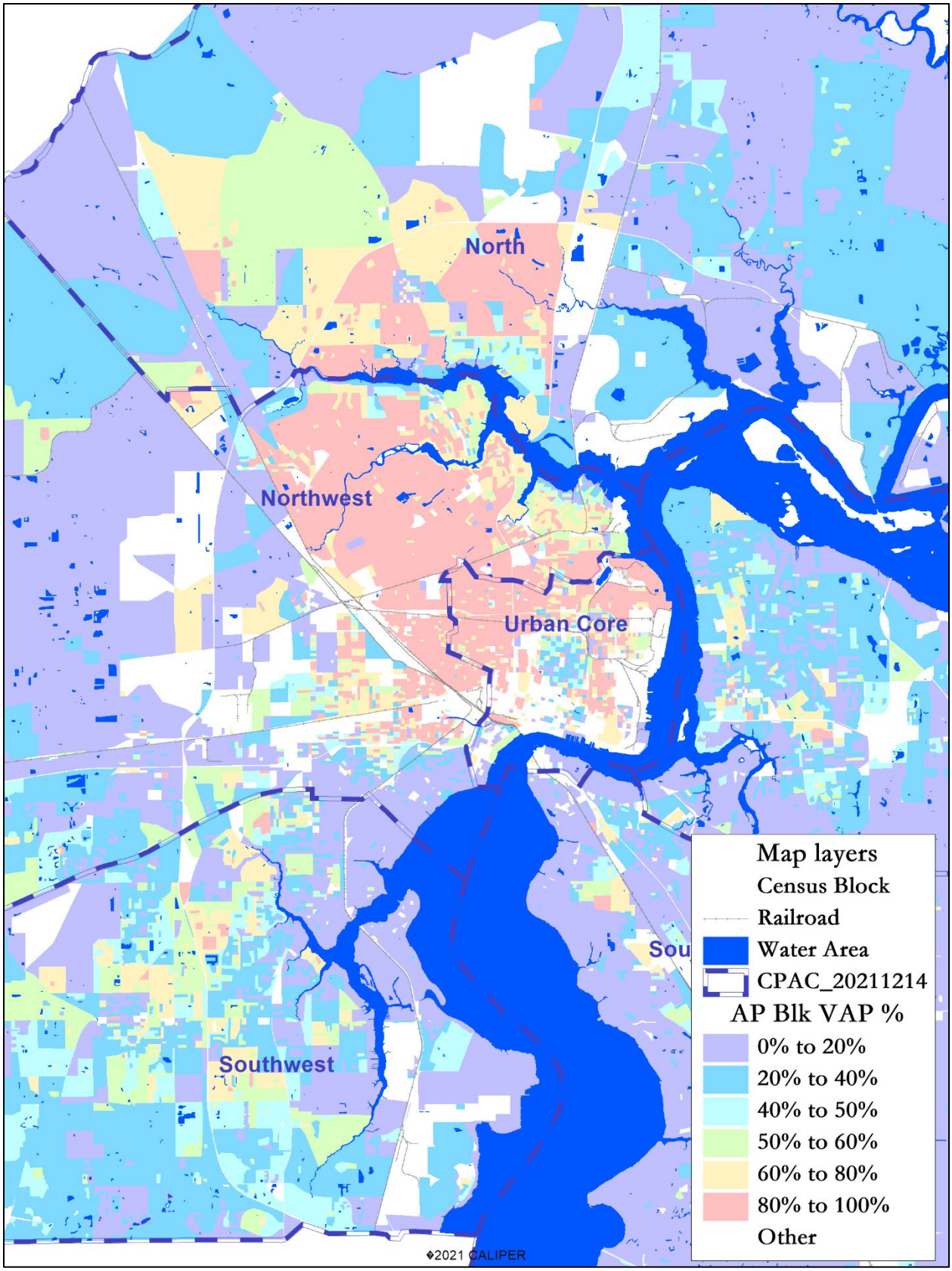
143. To comply with the one person, one vote principle, after including the Urban Core up to Trout River, Dist rict 7 still needed to gain population. To accomplish this, I moved the northern boundary of District 7 (bordering District 8) north of the Trout River to include a compact area bounded by major roads (Lem Turner Road, Main Street, and Dunn Avenue) and Br oward River.

144. I moved this boundary north rather than west to reflect the Committee's request that the District 8 Councilmember not be removed from the heart of the population she had represented for years. I did not believe that this request was racially motivated.

145. The result is a highly compact District 7.

146. District 7's Any Part Black Voting Age Population is 70.63%. This is because the Urban Core area has a large number of Black individuals living in a small geographic area in a highly concentrated manner . As shown in the Figure below, virtually all of the Census Blocks in the Urban Core, as well as the Northwest Census Blocks from the railroad to Trout River, are 80% Any Part Black Voting Age Population or higher (the exception – the bluer areas in the middle of the Urban Core in the map below, is the Springfield Historic District):

FIGURE 4: Any Part Black Percentage of Voting Age Population


North
Northwest
Urban Core
Southwest
Sou
Map layers
Census Block
Railroad
Water Area
CPAC_20211214
AP Blk VAP %
0% to 20%
20% to 40%
40% to 50%
50% to 60%
60% to 80%
80% to 100%
Other
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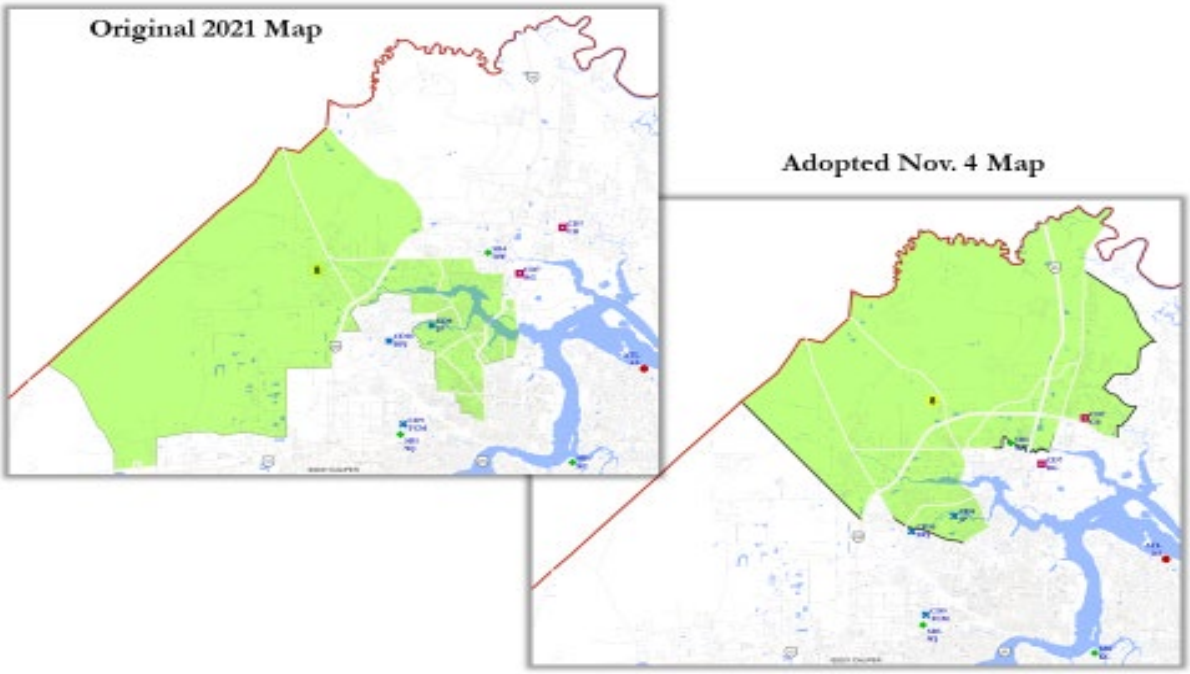
DISTRICT 8:

147. Below is a comparison of District 8 in the Enjoined Plan and the Maroon IIIE Fix adopted by the Council.

District 8



148. District 8 unites North Jacksonville from the Main Street corridor in the east to the Northwestern CPAC boundary in the west.

149. District 8 shares boundaries with Districts 2, 7, 10, and 12.

150. East of Main Street, District 8 extends east into former District 2 as needed for population balancing while staying north of I-295 to keep the San Mateo area within District 2.

151. East of Main Street and north of I-295, there are a series of geographically large and odd-shaped Census Blocks. This gives the eastern

border of District 8 (bordering with District 2) a jagged-edged look. This jagged edge, however, is entirely due to the geography of the Census Blocks, and the District tries to keep the scattered neighborhoods in that area united as much as possible.

152. The boundary between Districts 8 and 7 is discussed above in District 7. In short, this border balances the two districts' populations and keeps the District 8 incumbent in District 8 while being as compact as possible and following major and logical geographic divisions as much as possible.

153. Along the west edge of I-295, District 8 crosses the North CPAC border into the Northwest CPAC to keep the District 8 incumbent in the District. This crossing allows the District 8/District 12 border to follow the railroad from the City's northwestern border to I- 295, creating a clear and logical border between the two districts.

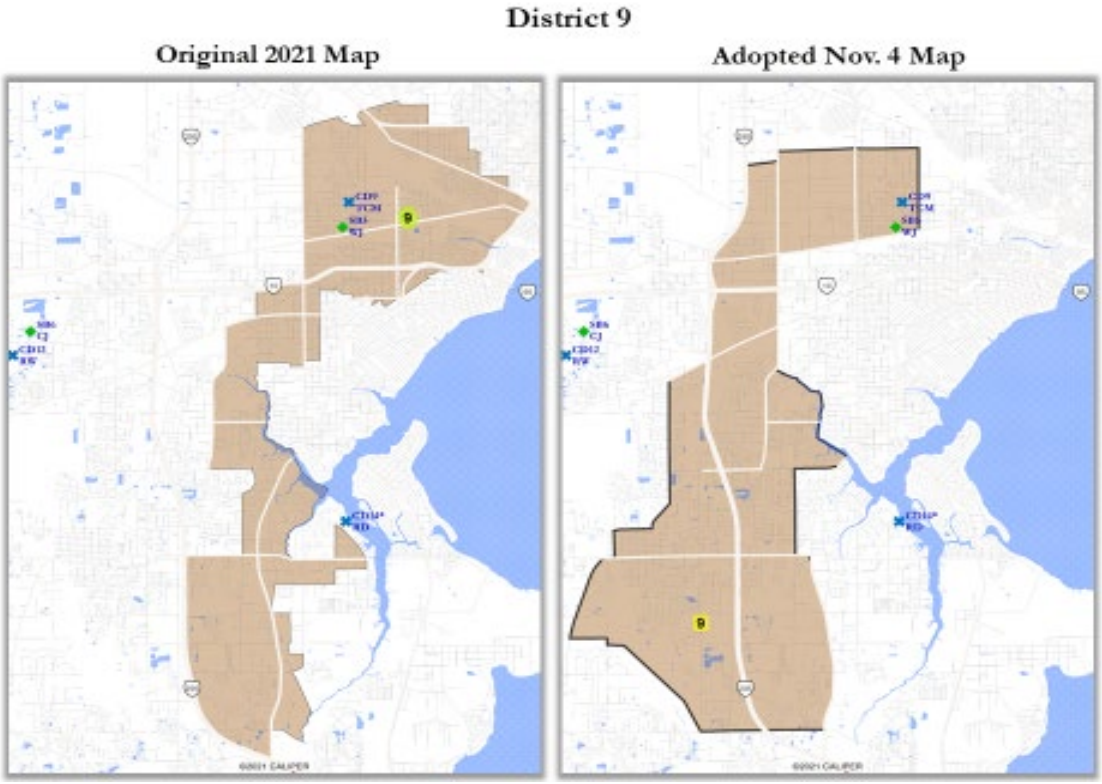
154. The border between District 8 and District 10 serves to keep both district incumbents –both of whom can run for re-election – in their respective districts, but does so while following compact neighborhood boundaries and major roads (New Kings Road and Moncrief Road).

155. The District 8 border south of the Trout River is completed by following another pair of major roads for the District 8 / District 7 border : Edgewood Avenue and Lem Turner Road.

156. The result is a district that is much more compact and regularly shaped than the Enjoined Plan.

DISTRICT 9:

157. Below is a comparison of District 9 in the Enjoined Plan and the Maroon IIIE Fix adopted by the Council.



158. District 9 combines two large communities: the communities running along the southern portion of the I-295 corridor and the northwest neighborhoods where the District's incumbent resides.

159. In the southern region, District 9 unites the communities along the I-295 corridor between Blanding Boulevard in the east and the Ortega River in the west.

160. As District 9 moves north, it continues to include the eastern side of the I -295 corridor and continues to follow major roads as it uses I- 295 on the west and Lave Avenue South on the east.

161. The western side of the I- 295 corridor north of the CPAC border a t Normandy Boulevard remains in District 12 for population balancing reasons and, in doing so, creates a clear geographic border between Districts 9 and 12.

162. In early iterations, District 9 initially captured only a minimum amount of territory in the north to include the incumbent Councilmember's residence. This Councilmember was newly elected in the August 2022 special election.

163. At the Committee's request, the northern boundaries were revised to focus on keeping more neighborhoods intact.

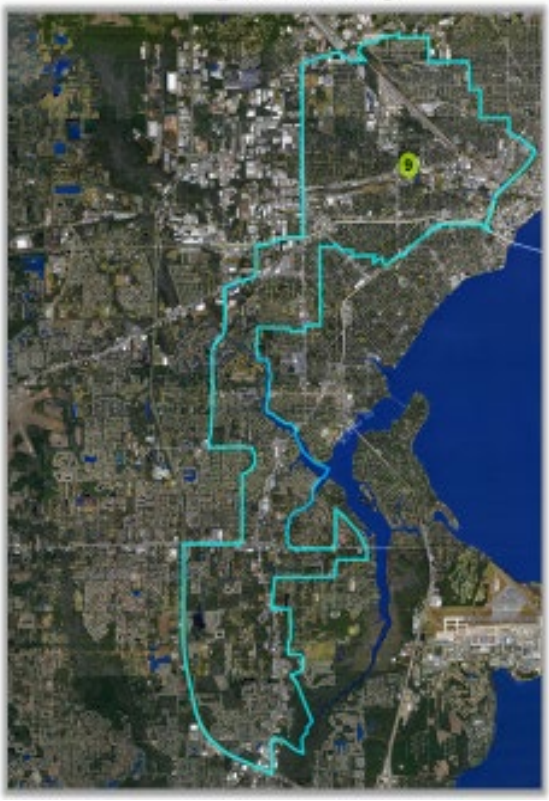
164. In Maroon III E Fix, the northern part of District 9 unites as much of Allendale, Woodstock, and Paxton as possible without dividing District 10 in half.

165. The satellite images of District 9 in the Enjoined Plan compared to the Maroon IIIE Fix map demonstrate how the Maroon IIIE Fix map follows natural boundaries to create a much more compact district. The Ortega River

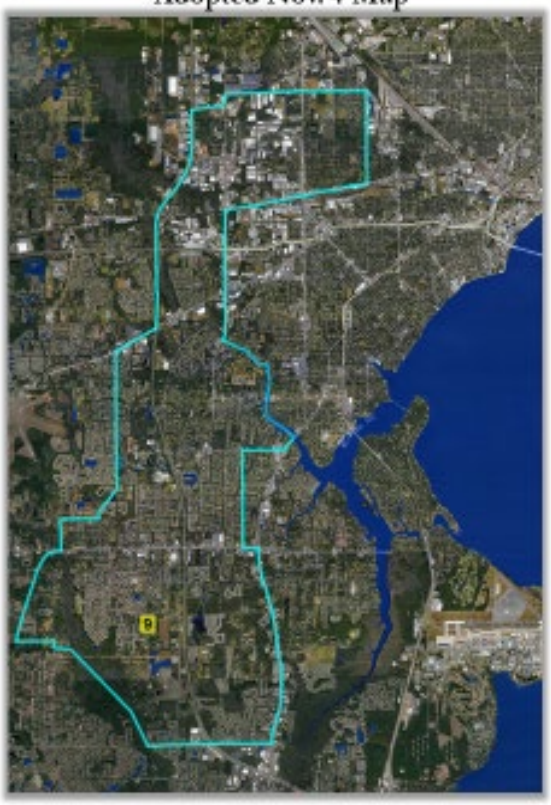
basin in the southwest and Blanding Road in the southeast are particularly clear (reinforcing the logic of using them as district borders), as is the neighborhood-focused nature of the northern portion of the District from I-295 in the west to Huron Street in the east.

District 9 Satellite Images

Original 2021 Map



Adopted Nov. 4 Map



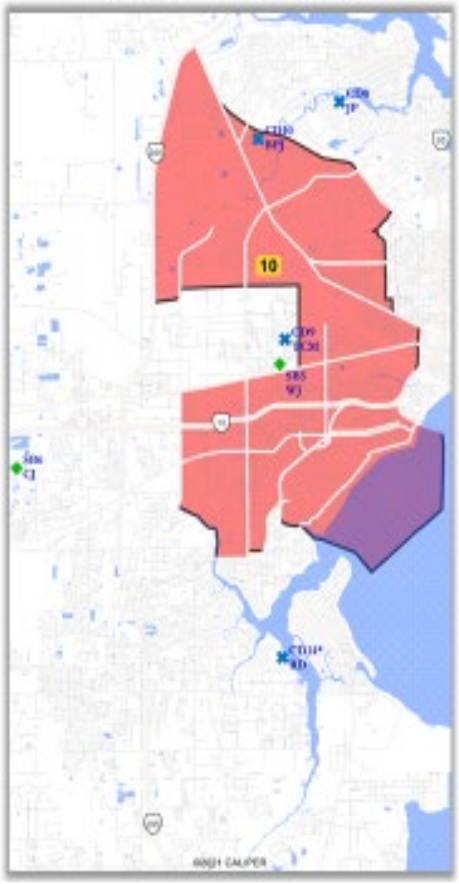
DISTRICT 10:

166. Below is a comparison of District 10 in the Enjoined Plan and the Maroon IIIE Fix adopted by the Council.

District 10

Original 2021 Map

Adopted Nov. 4 Map



167. District 10 unites neighborhoods from Hillcrest, Riverside, and Murray Hill in the central and southern regions with Carver Manor and Lincoln Villas in the northwest.

168. District 10 would be a highly compact district except for the "notch" along the western boundary which was needed to ensure that the incumbent Councilmembers in District 9 and 10 – both of whom could run for re-election – would be able to remain in separate districts.

169. The small "notch" when District 10 crosses 12th Street on the north side of District 9 is due solely to including all of an odd ly-shaped census block within District 10.

170. The eastern border of District 10 is largely defined by the CPAC border between the Northwest and Urban Core CPAC's.

171. The railroad is also a prominent visual and economic center of District 10.

172. During the Committee meetings, most of the public feedback and comments related to not dividing the Riverside historic area.

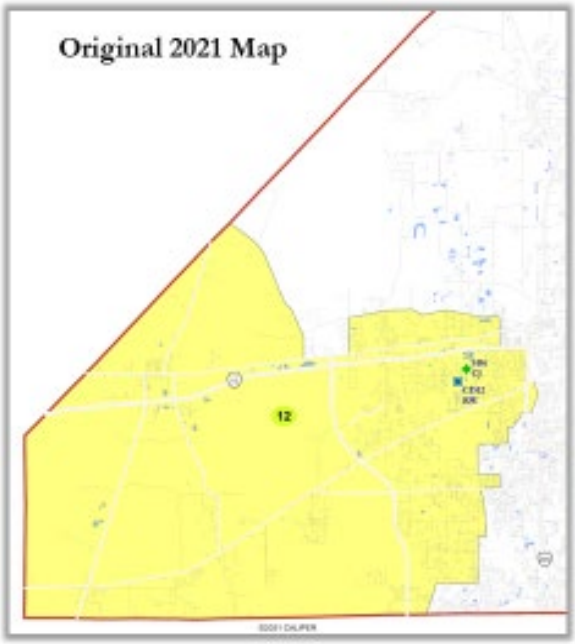
173. Because of the very limited population flexibility available, after considering a wide variety of options it was decided that the best way to unite the Riverside Historic district was to place it in District 10.

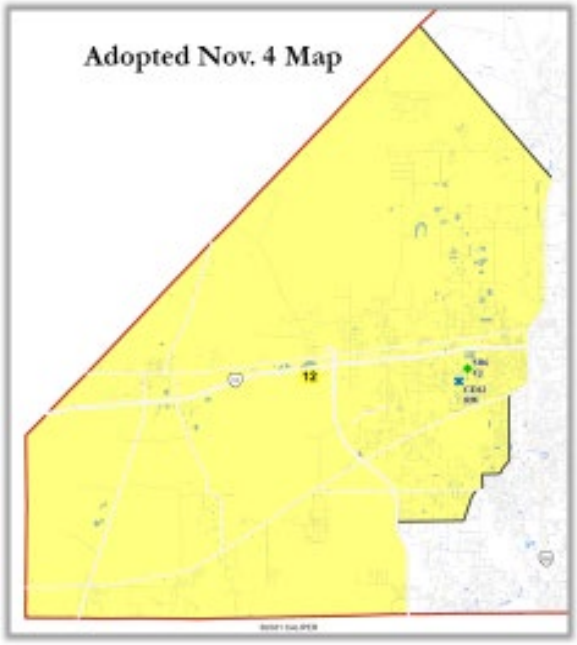
174. District 10 is now much more compact and regular in shape than District 10 in the Enjoined Plan.

DISTRICT 12:

175. Below is a comparison of District 12 in the Enjoined Plan and the Maroon IIIE Fix adopted by the Council.

District 12





The new D12's much larger size reflects its rural focus, lacking the higher-density areas on the east edge of the original D12.

176. District 12 is now a compact and more rural district that stays entirely west of I-295 and south of the Southern Railroad.

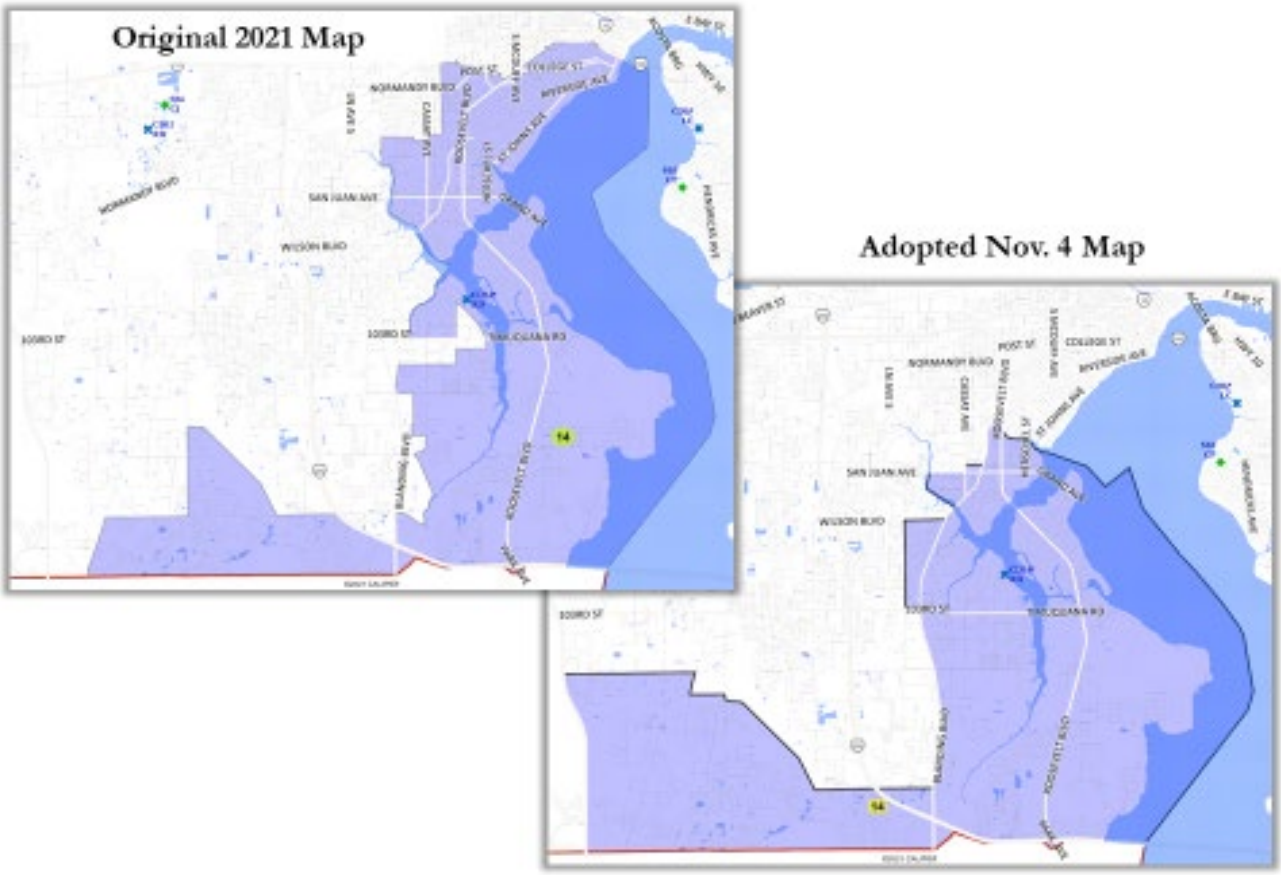
177. State Road 23, a major road through the area, defines the boundary between Districts 12 and 14 in the southeast corner of District 12 .

178. For its border with District 9, I -295 is District 12's border in the Northwest CPAC area, while population balancing, compactness and attempting (as much as possible) to keep the more rural areas in District 12 and the more densely population developments in District 9 determined the boundaries between Districts 12 and 9 in the Southwestern CPAC areas.

District 14:

179. Below is a comparison of District 14 in the Enjoined Plan and the Maroon IIIE Fix adopted by the Council.

District 14



180. District 14 unites the riverfront communities from Ortega to the County's southern boundary.

181. The primary inland boundary is Blanding Boulevard, a major road separating the riverfront region from the I-295 corridor.

182. In the north, District 14 crosses Blanding in two places: (1) to unite the Lakeshore Boulevard community peninsula; and (2) purely for population balancing reasons between Wilson Boulevard, Jammes Road, and 103rd Street.

183. The other population center of District 14 is Argyle Forest, which is a heavily developed area separated from the rest of the urban portions of the county by I-295 and the Ortega River. There are no roads across the Ortega River between Collins Road in the south and 103rd Street in the north.

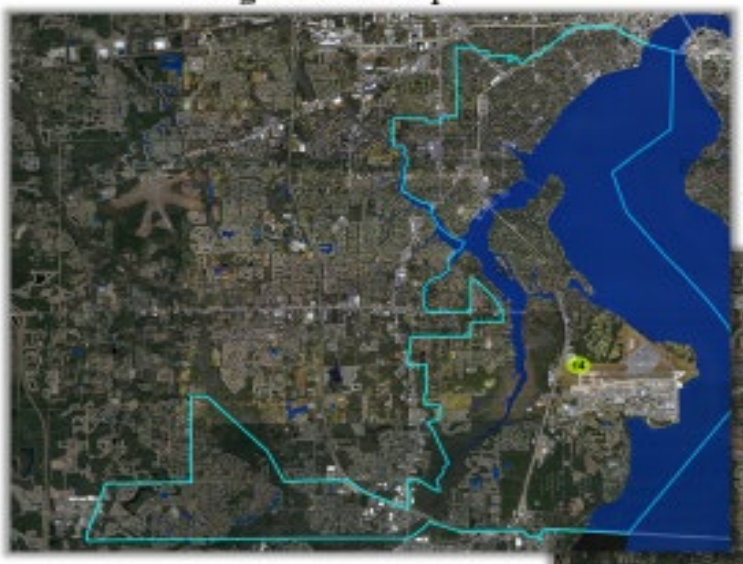
184. By placing the Argyle Forest area in District 14, it was possible to keep the Argyle Forest area (including Chimney Lakes and Settlers Landing) united, as well as uniting as much as possible the riverfront region (also in District 14) and the I-295 corridor region (in District 9).

185. While not as compact as the other districts, District 14 was drawn to keep certain communities united and to avoid splitting other communities.

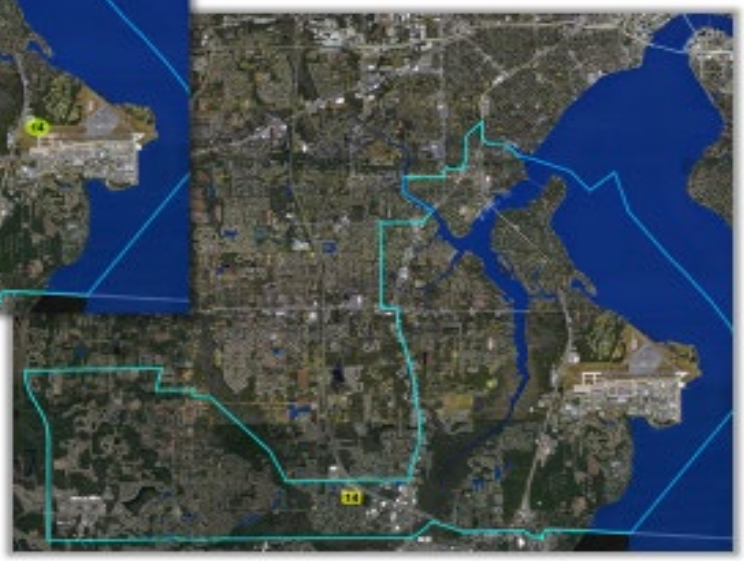
186. The satellite image demonstrates the smoother lines and more regular nature of District 14.

District 14 Satellite Images

Original 2021 Map



Adopted Nov. 4 Map



DISTRICT 11 and DISTRICT 3

187. While these districts were not challenged in the Plaintiffs' lawsuit, the Committee requested a small change to District 11: moving the Pablo Creek community from District 11 to District 3 or District 13. The area at issue in District 11 was roughly a 600- person area south of Highway 202. This small area was geographically isolated in District 11, and moving it into District 3 brought it together with its geographically adjacent neighborhoods on the north side of Highway 202. Because of District 13's already large population and very limited geographic connection to the neighborhood in question,

moving this area to District 13 would have more detrimental impacts than moving this area to District 3 .

188. Many of the modifications incorporated into the Maroon IIIE Fix map reflected public requests. Over the course of the Committee deliberations , much of the public feedback and input related to not splitting communities such as Riverside/Avondale, Argyle Forest, Springfield, and downtown, and including San Mateo in District 2.

189. At no time during my engagement with the City did I use any euphemistic terms as code for racial considerations.

190. I never used the terms “rural” or “urban” as code words for white and black .

191. Rather, when I was describing an area that was “rural”, I referred to areas with less-dense housing patterns and significantly lower population per square mile in comparison to other parts of the City. As shown in Mr. Fairfax’s exhibits (Appendix B9 to his declaration), in the contested districts these areas are predominately east and north of the I-295 corridor.

192. In contrast, when I was describing an area as “urban”, I was referring to areas of more-dense housing patterns and higher population per square mile. In fact, I regularly considered and described the riverfront region and the greater Argyle Forest area as urban areas. Neither area is even close

to majority-Black. Similarly, the Riverside Historic District is clearly urban and not even close to majority-Black.

193. Nor did I use incumbency as a pretextual for race.

194. Rather, I provided the Committee with options as to what different plans could look like if: (1) all incumbents were put in a separate district, regardless of whether the incumbent was termed out; and (2) if only incumbents that were not termed out were placed in separate districts.

195. Ultimately, the Committee decided to only take into consideration those incumbents who could run again and were not termed out.

196. The final plan did pair two incumbents within the same district – District 8. However, one of those incumbents could not run again.

197. Nor do I believe (and the numbers support my belief) that the Councilmembers' requests for changes to the draft maps were racially motivated.

198. No racial data was included on any map provided to Council .

199. I did not consider the racial makeup of a district until after I had drawn the proposed boundaries, both in my initial maps and in all revisions .

200. I only considered the racial makeup of a district to ensure that the proposed boundaries complied with Plaintiffs' proposed VRA analysis and otherwise contained a strong defense against a potential Voting Rights Act Section 2 challenge if a majority minority district was required.

201. Other than to ensure compliance with the Plaintiffs' VRA analysis and the very small concerns noted above, rac e was not a consideration in drawing any of the boundaries in any of the proposed maps, including the final map – Maroon IIIE Fix.

202. I did consider the political makeup of a district while drawing the proposed boundaries.

203. I do not believe that political affiliation is a proxy for race in Jacksonville.

204. In Jacksonville, only 55% of registered Democrats are African American. One significant concern with Plaintiffs' P3 map is that barely 50% of the registered Democrats in their proposed District 7 would be Black. (This concern is in addition to the concern of Plaintiffs' proposed District 7 dividing the Urban Core CPAC).

205. In addition, only 80% of African Americans registered to vote are registered Democrats, which is below the national levels measured by the Pew Foundation. [3]

206. In comparison with the data in that same Pew Foundation report, African American registered voters in Jacksonville are significantly more likely to be registered as "other / independent" than nationally.

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[3] https://www.pewresearch.org/2020/09/23/the -changing -racial -and-ethnic - composition -of-the -u -s-electorate/

207. As part of my engagement, the City also asked me to review the Plaintiffs' expert reports, each of which I address briefly below.

208. If Plaintiff's claim that District 7 in map P3 – a District where Black voters are barely 50% of registered Democrats and Black voters are only 34% of all registered voters – regularly elects the Black-preferred candidates is accurate, that raises significant questions regarding whether racially polarized voting actually leads to the defeat of candidates preferred by Black voters in Jacksonville.

209. The most glaring flaw with the Expert Report of Anthony E. Fairfax is that it contains no conclusions or analysis. It is simply a set of numbers and charts, with no analysis or opinions.

210. Nothing in Mr. Fairfax's report provides any analysis as to why the Maroon IIIE Fix map purportedly violates and constitutional or statutory requirement, or how Pl1, P2, P3, or the Demonstration Plan satisfy it. Mr. Fairfax simply provides reports that are built into Maptitude.

211. As it relates to compactness, I reviewed the Plaintiffs' maps – P1, P2, and P3 – and compared the compactness scores using six different measures to the compactness of the Maroon IIIE Fix. Attached as Exhibit 9 is the compactness measures of the districts in the final plan that was adopted by City Council in November 2022 as well the Plaintiffs' proposed plans.

212. Using the Area/Convex Hull test, all maps are essentially equally compact, with minimum scores within .02 of each other.

213. Using the Ehrenburg test, all maps are essentially equally compact, with minimum scores within .01 of each other.

214. Using the Length/Width test, the Maroon IIIE Fix map is the most compact, with the maximum score for maps P1, P2, and P3 each distantly behind. For this test, a higher score is the least-compact district.

215. Using the Polsby- Popper test, all maps are essentially equally compact, with minimum scores within .01 of each other.

216. Using the Reock test, the minimum scores of the P1, P2, and P3 maps fare better than in the Maroon IIIE Fix map, but only by 0.03 or 0.05 on a scale of 0 to 1.

217. Using the Schwartzberg test, the Maroon IIIE Fix map is tied for second in compactness with P3, with P1 being the least compact.

218. In sum, the Maroon IIIE Fix map, P1, P2, and P3 are nearly identical in compactness in four out of six tests, and in the Length/Width test, the Maroon IIIE map is significantly more compact than Plaintiffs' maps.

219. In Appendix B5, Mr. Fairfax uses silhouettes to illustrate the district boundaries. These silhouettes exclude the St. Johns River, likely to make the districts look less compact. However, the St. Johns River must be

assigned to districts, and nothing can be done when creating district boundaries to change the shape of the riverbank.

220. Attached as Exhibit 10 is a pdf that puts Mr. Fairfax's silhouettes for Districts 9 and 10 next to each other, and a pdf that that overlays the Enjoined District 9 and 10 over the Maroon IIIE Fix version. These pdf's show the significant differences and changes to the district s. To make even more significant change would require the intentional division of the southern I-295 corridor and the Urban Core communities of interest.

221. Appendix B13 to Mr. Fairfax's report relating to the "Population Moved" is misleading. The chart appears to only contain district changes arbitrarily selected by Mr. Fairfax. If he included the full set of changes made, the chart would show that substantial changes were made to the challenged districts.

222. Related to this is Mr. Fairax's chart in Appendix B11 relating to district core retention. Mr. Fairfax's chart is a built- in report from the Maptitude software that analyzes the number of people who were in the original district. Inevitably the Maroon IIIE Fix map will have areas that overlap with the districts of the same district number in Enjoined Plan. While the Court ruled the Enjoined Plan's boundaries were overly based on race, the Maroon IIIE Fix map entirely focused on statutory and traditional redistricting criteria, such as following clear geographic dividers and keeping basic

communities together (sometimes in different districts than those from the Enjoined Plan). The Maroon IIIE Fix map contains none of the odd zigs, zags, arms and extensions in the Enjoined map that the Court ruled were associated with capturing Black constituents.

223. Dr. Imai's report is also flawed.

224. As an initial matter, Dr. Imai's analysis is focused on the areas included in Districts 7, 8, 9, and 10 from the Enjoined Plan. The Maroon IIIE Fix map and the Plaintiff maps P1, P2 and P3 include different geographic areas in these Districts, including the Riverside/Avondale historic area, which will alter the results.

225. In addition, Dr. Imai's report is a partisan polarization analysis, not a racially polarized voting analysis. Dr. Imai studied only Democratic voter preferences and Democratic candidate success, not Black voter preferences and Black voter-preferred candidate success . As Dr. Imai noted in paragraph 46 in Appendix C of his original report, "When there are multiple candidates from the same party in an election, I combine their votes into Democrat, Republican, and others." In doing so, what should have been one possible conclusion of the polarized voting analysis (that all Democratic candidates enjoyed equal levels of support among Black voters, and that all Democratic candidates equally lacked support among White voters) became a built-in assumption in Dr. Imai's model.

226. Dr. Imai's analysis also shows high levels of crossover voting, meaning that the jurisdiction fails to meet the racial polarization evidence test of the Voting Rights Act.

227. Dr. Imai states that a 39% Any-Part Black Voting Age Population ("AP Black VAP") district (District 7 in plan P3), is sufficient to elect the candidates preferred by Black voters. This means the other 12% of the population of voter needed to reach the 50% + 1 threshold is coming from more than one in five voters that are crossing over to support the candidates Dr. Imai states are preferred by Black voters, but in fact, these candidates are simply the candidates supported by Democratic voters.

228. Looking at District 7 in map P3 more closely, only 34% of voters are Black, and only 28% of voters are Black Democrats. And Black Democrats are only 53% of the Democratic voters in this proposed district. If Dr. Imai's assumptions and conclusions are correct, more than one-third (17% of the 50%+1 required to win) of the votes for the candidate Dr. Imai classifies as Black-preferred candidates are coming from non-Black crossover voters. That level of crossover voting calls into question Dr. Imai's fundamental finding that racial bloc voting leads to the defeat of Black-preferred candidates.

229. In addition, Table 1 in Dr. Imai's report continues to ignore the fact that partisan waves are not random. For example, if a Democratic candidate loses District 7, that Democratic candidate almost certainly also

loses District 9 [4]. Thus, Plaintiffs' maps have a high likelihood of only 2 of the 4 districts analyzed failing to elect the Democratic -preferred candidate at least once and possibly twice during the time these boundaries would be in effect.

230. Dr. Austin's report is also unreliable.

231. Dr. Austin, provides little, if any, evidence of Black voters having less opportunity to vote for candidates of their choi ce in Jacksonville.

232. Dr. Austin's report does not focus predominately on Duval County or Jacksonville. Duval County is referenced in only six paragraphs (paragraphs 25, 109, 150, 151, 153, and 236) and only in two paragraphs when analyzing the first four senate factors. Jacksonville is referenced in thirteen paragraphs (paragraphs . 5, 105, 107, 153, 155, 196, 203, 228, 229, 231, 232, 233, 236) and only in two paragraphs when analyzing the first four senate factors.

233. By comparison, Miami-Dade and the City of Miami are referenced in ten paragraphs (pp. 36, 41, 61, 117, 119, 120, 121, 124, 149, 152) and in eight paragraphs when analyzing the first four senate factors.

234. Dr. Austin also omits critical details. For example, despite linking discriminatory policies with Republican governance, Dr. Austin's

[4] In map P3, the "Democratic candidate" (in Dr. Imai's math this could be one candidate or a pool of all Democratic candidates) loses District 7 in th ree out of Dr. Imai's 31 analyzed elections, and loses District 9 in 7 out of the 31 elections.

report fails to mention that two current City Council members are Black Republicans.

235. Dr. Austin also often: (1) fails to provide supporting evidence for her statements (e.g , paragraphs 90, 163 -66), (2) makes far-fetched statements (compare Table 1 (noting 41.7% Black poverty rate in Duval County) with paragraph 155 (noting 20.9% Black family poverty rate in Duval County); and (3) hedges her unsupported statements beyond measure (e.g., paragraphs 156-161, 166 do not cite to data or sources and use terms such as “likely”, “may”, “potentially” or “probably”).

236. Notably, Dr. Austin’s report (paragraph 177) undermines Dr. Imai’s report. Although Dr. Imai links Democratic voters with Black voters, Dr. Austin notes that in the 2002 gubernatorial election, the black candidate received only 12% of the vote in the Democratic primary.

237. To the extent Plaintiffs contend that the VRA applies in this litigation, none of Plaintiffs’ experts – separately or collectively – explain how the City violated the Voting Rights Act, nor did any of the Plaintiffs’ experts prove that the Voting Rights Act applies here.

I declare and state under penalty of perjury, that the foregoing is true and correct. Executed this 28th day of November, 2022, in Los Angeles County, California.

DOUGLAS JOHNSON

EXHIBIT 1

NDC
National Demographics Corporation

Resume of Douglas Johnson, Ph.D.

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Glendale, CA 91221
djohnson@NDCresearch.com

phone: (310) 200-2058
fax: (818) 254-1221

Employment

President, National Demographics Corporation, 2006 – present.
Research Affiliate, Rose Institute of State and Local Government, 2001 – present.
Senior Analyst, National Demographics Corporation, 2001 – 2006.
Project Manager and Senior Manager at three internet startup companies, 1999 - 2001.
U.S. Representative Stephen Horn, Legislative Director and System Manager. 1993 – 1997.
Coro Foundation, Fellowship in Public Affairs. 1992 – 1993.
Rose Institute for State and Local Government, Student Manager. 1989 – 1992.

Education

Claremont Graduate University, Ph.D. in Political Science, 2015.
Dissertation: "Independent Redistricting Commissions: Hopes and Lessons Learned."
UCLA Anderson Graduate School of Management, MBA, 1999.
Claremont McKenna College, BA in Government (Political Science), 1992.

Academic Honors

Graduated Cum Laude from Claremont McKenna College.
Phi Beta Kappa. Philip Roland Prize for Excellence in Public Policy.

Publications and Articles

The CVRA [California Voting Rights Act] Tsunami Rolls Across California, with Dr. Justin Levitt. Paper presented at the American Political Science Association 2018 conference as part of the August 31, 2018, panel entitled "California Election Reform: Has It Improved Representation and Participation?"
Quiet Revolution in California Local Government Gains Momentum, Rose Institute of State and Local Government White Paper on California Voting Rights Act, November 3, 2016.
Visalia Times, "How to draw new city council districts," September 19, 2014.
Christian Science Monitor "Let the public help draw voting districts," October 25, 2013.
New York Times, "The Case for Open Primaries," February 19, 2009.
Los Angeles Times Opinion Articles:
"A neighbor's help on redistricting" June 24, 2007.
"A Trojan horse primary for the GOP" February 25, 2007.
"Where a porn palace stood" (article on redevelopment), July 30, 2006.
Fresno Bee Opinion Article: "The Poison Handshake" June 15, 2004.
Redistricting in America. Rose Institute of State and Local Government, 2010.
Restoring the Competitive Edge: California's Need for Redistricting Reform and the Likely Impact of Proposition 77. Rose Institute of State and Local Government, 2005.
"Competitive Districts in California" Rose Institute of State and Local Government, 2005.
Latinos and Redistricting: "Californios For Fair Representation" and California Redistricting in the 1980s. Rose Institute of State and Local Government, 1991.

NDC
National Demographics Corporation

Douglas M. Johnson, Ph.D.

Independent and Advisory Commission Redistricting Projects

Ohio Redistricting Commission, "Independent Map-Drawer," 2022
Arizona Independent Redistricting Commission, lead Subject Matter Expert consultant, 2021
Santa Barbara County Independent Redistricting Commission, technical consultant, 2021
City of Menlo Park Advisory Districting Commission, lead technical consultant, 2018
Arizona Independent Redistricting Commission, lead technical consultant, 2001-2008
San Diego City Council Independent Redistricting Commission, lead technical consultant, 2011
City of Surprise Advisory Commission on Redistricting, 2011
Pasadena City Council Advisory Commission on Redistricting, co-lead technical consultant, 2011
Pasadena Unified School Board Advisory Commission on Redistricting, co-lead technical consultant, 2011
City of Modesto Independent Redistricting Commission, lead technical consultant, 2011
City of Modesto Independent Districting Commission, lead technical consultant, 2008

Litigation Experience

"Independent Mapmaker," State of Ohio 2022 redistricting. Appointed by Ohio Redistricting Commission under order of the State Supreme Court, *League of Women Voters of Ohio et al vs Ohio Redistricting Commission et al*, Case No. 2022-0303.
After the "Independent Mapmaker" named by the Democratic members of the Commission had to leave the project early, both sides agreed my acting as sole "Independent Mapmaker" to continue working on State House and State Senate redistricting maps.

Expert witness declaration for the City of Redondo Beach, California, in *City of Redondo Beach vs State of California*, Los Angeles County Superior Court Case Case No. BS172218 litigation regarding the California Voter Participation Act (currently pending).

Expert witness declaration for West Contra Costa Unified School District in *Ruiz-Lozito vs West Contra Costa Unified School District* litigation under the California Voting Rights Act, Contra Costa Superior Court Case Number C18-00570 (currently pending).

Expert witness declaration, deposition and testimony for Kern County, California, in *Luna v County of Kern* litigation under the Federal Voting Rights Act.

Expert witness declaration and testimony for North Carolina in *Covington v State of North Carolina* litigation under the Federal Voting Rights Act.

Expert witness declaration for City of Fullerton in *Jamarillo v City of Fullerton* litigation under the California Voting Rights Act.

Expert witness declaration for City of Whittier in *Diego v City of Whittier* litigation under the California Voting Rights Act.

Expert witness declaration and deposition for plaintiff in *Harris vs Arizona Independent Redistricting Commission* litigation.

Expert witness declaration and deposition for Santa Clarita Community College District in *Solis v Santa Clarita Community College District* litigation under the California Voting Rights Act.

Expert witness declaration for the Ohio Redistricting Commission in *League of Women Voters of Ohio, et al., v. Ohio Redistricting Commission*, combined Case Numbers Case 2021-1193, 2021-1198 and 2021-1210.

Expert witness declaration, deposition and testimony for City of Highland in *Garrett v City of Highland* litigation under the California Voting Rights Act.

Expert witness declaration, deposition and testimony for City of Palmdale in *Jauregui et al vs City of Palmdale* and *Garrett v City of Highland* litigation under the California Voting Rights Act.

Testified as 30(b)(6) "Most Knowledgeable" witness for Arizona Independent Redistricting Commission in *Arizona Minority Coalition v Arizona Independent Redistricting Commission*, including seven days of direct testimony and cross-examination in the state court case. Also testified in the related federal court case.

Consulting expert for the following jurisdictions on their California Voting Rights Act-related cases, including preparing analysis and assisting with witness and attorney preparation: Cities of Anaheim; Compton, Modesto, Poway, Santa Clara, Santa Clarita, and Whittier; Santa Clarita Community College District; and Tulare Health Care District.

Speaker or Panelist

California League of Cities Los Angeles County Chapter, Keynote Speaker, "Redistricting Wrap-Up", March 3, 2022.

Tri-County Chamber of Commerce, "Redistricting Update," December 3, 2021.

California League of Cities Mayors and Council Members Executive Forum, "Coping with the New Reality of By-District Elections," June, 2020.

San Gabriel Valley Economic Partnership, ,June 26, 2019

Community Roundtable, " What's at Stake in the 2020 Census?," Hosted by U.S. Representative Ted Lieu. June 19, 2019.

Community Roundtable, "The Importance of the Census," Hosted by U.S. Representative Judy Chu. May 30, 2019.

League of Women Voters of Burbank and Glendale, Keynote Speaker, "Town Hall meeting on SB415" (The California Voter Participation Rights Act), May 8, 2018.

California League of Cities, City Manager Department Annual Conference, Panelist, "CVRA and the Profound Impact on Local Governance," February 15, 2019.

California League of Cities, Mayors and Councilmembers Executive Forum, Moderator, "The California Voting Rights Act and the District-Drawing Process," June 29, 2018.

California League of Cities, City Attorney Department, panelist, "The California Voting Rights Act: Recent Legislation & Litigation Outcomes," May 3, 2018.

California League of Cities, City Clerk Department, Co-Presenter, "California Voting Rights Act – Transitioning From At-Large To By-District Elections: A Practical Guide For City Clerks," April 19, 2018.

California School Board Association Annual Education Conference panelist: "15 Years with the California Voting Rights Act: Lessons Learned and Challenges Ahead." December 1, 2017.

University of California's National Public Service Law Conference: Civil Rights in the 21st Century: Moderator, "Voting Rights 101." September 23, 2017.

City Clerks Association of California Annual Conference panelist: "California Voting Rights Act: Putting the 2016 Legislation into Practice." April 13, 2017.

California School Board Association Annual Education Conference panelist: "The California Voting Rights Act: What Board Members Must Know." December 4, 2015.

Associated Cities of California – Orange County, Keynote Speaker, Newly Elected Officials' Reception and Dinner, "The California Voting Rights Act," January 29, 2015.

California League of Cities, City Manager Department, 2015 Department Meeting: "Opportunity to Engage Residents: The California Voting Rights Act." January 29, 2015.

California League of Cities, City Clerk Department, 2014 Annual Meeting: "Whose Line Is It Anyway: Making the transition from at-large to by-district elections." September 3, 2014.

National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2007 Spring Forum, "The Arizona Independent Redistricting Commissions' experiences with the first-ever independent redistricting."

National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2008 Spring Forum, "Communities of Interest In Redistricting: A Practical Guide."

National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2009 Fall Forum, "The Key to Successful Redistricting."

National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2010 Spring Forum, "Communities of Interest in Redistricting: A key to drawing 2011 plans (and for their defense)."

National Conference of State Legislatures, Redistricting and Elections Standing Committee: 2011 Winter Forum, "Citizen Voting Age Data from a line-drawer's viewpoint."

Luncheon Keynote Speaker, Santa Barbara's Channel Cities Club, "California's next experiment: independent, public redistricting," January 18, 2011.

Annual Conference, Arizona League of Cities and Towns, Presenter at "Redistricting Law and the Voting Rights Act: What It Means for Your City or Town in 2011," August 25, 2010.

Redistricting, The 2010 Census, and Your Budget, Sponsored by the Rose Institute of State and Local Government, California League of Cities, October 15, 2009.

Arizona Election Law 2010 Continuing Legal Education Conference, "Communities of interest and technology in redistricting," sponsored by the Arizona State Bar Association, March 2010.

California's New Independent Redistricting Commission, sponsored by the Irvine Foundation and the California Redistricting Collaborative, December 15, 2009.

Tribal Association of Sovereign Indian Nations (TASIN) Legislative Day 2009, "The 2010 Census and 2011 Redistricting in California," December 2, 2009.

California School Board Association, "Litigation Issues and the California Voting Rights Act," December 4, 2009.

California Latino School Boards Association, "Introduction to the California Voting Rights Act," August 20, 2009.

Building a National Reform Movement, Salt Lake City, Utah, 2006, conference on redistricting .reform hosted by the League of Women Voters, Campaign Legal Center, and The Council for Excellence in Government.

Texas Tech University, "A Symposium on Redistricting," May, 2006.

California League of Cities, "Introduction to the California Voting Rights Act."

Voices of Reform, a project of the Commonwealth Club of San Francisco: multiple forums on redistricting and / or term limits, 2006 – 2007.

Classroom speaker at Bellflower High School, Pepperdine University, the University of La Verne, Pomona College and Claremont McKenna College.

Charter and/or Ballot Language Consultant

Castaic Lake Water Agency and Newhall County Water District consultant advising on process, rules and legislation language for merger of the two districts including changing from at-large to by-district election system. (2015-2016)

City of Corona: consultant for City Council on a potential city charter and a move to by-district elections. (2015-2016)

City of El Cajon: consulted on writing of charter revision and public education campaign for ballot measure changing from at-large to by-district City Council elections. (2016)

City of Goleta: consulted on development of ordinances and ballot language asking voters what election system they preferred. (2003 – 2004)

City of Menifee: advised commission considering language on by-district elections. (2009 – 2010)

City of Modesto: advised commission that successfully developed a city charter change moving Modesto from at-large to by-district elections and created an independent redistricting commission. (2006 – 2008)

City of Pasadena (on behalf of Pasadena Unified School District): advised commission that successfully developed a city charter change moving Pasadena Unified from at-large to by-district elections and created a redistricting commission. (2011 – 2012)

Voting Rights Act and Racial Bloc Voting Analysis

Attorney-client privilege bars the listing of most of NDC's specific clients, but NDC has performed racial bloc voting analysis for clients of the following law firms (and for other jurisdictions):

Nielsen, Merksamer, Parrinello, Gross & Leoni: Compiled and analyzed data for over 120 different jurisdictions facing voting rights litigation;

Lozano, Smith: Performed analysis of racial bloc voting in 4 separate jurisdictions.

Richards, Watson & Gerson: Compiled and analyzed potential liability under California Voting Rights Act and California Voter Participation Rights Act for about a dozen cities.

Atkinson, Andelson, Loya, Ruud & Romo: Performed/performing on analysis of racial bloc voting in dozens of jurisdictions and California Voter Participation Rights Act liability analysis for multiple school districts.

Dooley, Herr & Peltzer: Performed racial bloc voting analysis of 7 elections in 4 different election years. Also advised attorneys on rebuttal of plaintiff's racial bloc voting analysis.

NDC
National Demographics Corporation

Douglas M. Johnson, Ph.D.

Districting / Redistricting Clients Prior to 2021

States

Arizona 2001 Independent Redistricting Commission
Florida State Senate 2001

Counties

Los Angeles
Merced
San Diego
San Bernardino
San Mateo
Yuma (AZ)

Cities

Anaheim
Apple Valley
Arcadia
Atwater City
Banning
Barstow
Bellflower
Big Bear Lake
Buckeye
Buena Park
Camarillo
Campbell
Carlsbad
Carpinteria
Cathedral City
Cathedral City
Ceres
Chino
Chino Hills
Chino Hills
Citrus Heights
Claremont
Colton
Compton
Corona
Dana Point
Dixon
Duarte
Eastvale
El Cajon
El Cajon
Encinitas
Escondido
Exeter
Firebaugh
Fontana
Fowler
Fullerton
Glendale (AZ)
Glendale (CA)
Glendora
Half Moon Bay
Hemet
Hesperia
Hesperia
Highland
Imperial Beach
Indio
Jurupa Valley
King City
Kingsburg City
La Mirada
La Mirada
Lake Elsinore
Lake Forest
Lemoore
Lodi
Lompoc
Los Alamitos City
Los Banos
Madera
Martinez City
Menifee
Menlo Park
Merced
Mesa (AZ)
Modesto
Monrovia
Monterey Park
Moorpark
Moreno Valley
Morgan Hill
Murietta
Oakland
Ojai
Oxnard City
Pacifica
Palm Springs
Palmdale
Parlier
Pasadena
Paso Robles
Patterson
Peoria (AZ)
Placentia
Porterville
Poway City
Rancho Cucamonga
Redlands
Redlands
Redwood City
Reedley
Riverbank
San Clemente
San Diego
San Marcos
San Marcos
San Rafael
Sanger
Santa Barbara
Santa Clarita
Santa Maria
Santa Rosa
Santee City
Simi Valley
Solana Beach
South Pasadena
South SF
Stanton
Surprise
Tehachapi
Temecula
Torrance
Tulare
Turlock
Twentynine Palms
Vallejo
Ventura
Victorville
Victorville
Visalia
Vista
Wasco
West Covina
Whittier
Wildomar

Yucaipa
Yucca Valley

Community College Districts

Antelope Valley
Barstow
Coast
Cuesta
Glendale
Grossmont-Cuyamaca
MiraCosta
Palomar
Rancho Santiago
San Diego
Santa Clarita
Sierra
Southwestern

Special Districts

Alta Irrigation
Castaic / Newhall Water
Castaic Lake Water Agency
Chino Fire
Desert Healthcare
Desert Water Agency
Fallbrook Regional Healthcare
Fresno Irrigation
Grossmont Healthcare
Imperial Irrigation District
Joshua Basin Water
Jurupa Community Service District
Kings River Conservation District
Lake Arrowhead CSD
Leucadia Wastewater
Mojave Water Agency
Monterey Airport
Palmdale Water
Palomar Healthcare
Rowland Water
San Bernardino Water
Santa Clara Valley Water
Santa Maria Airport
Tri-City Health
Tulare Health Care District
Upper San Gabriel Valley
West Valley Water
Western Municipal Water
Westside Community Health Care District
Winton Water

School Districts

Alpine Union
Alpine Union Elementary
Alta Vista
Bakersfield City Schools
Barstow Unified
Bonsall Union Elementary
Borrego Springs Unified
Buena Park Elementary
Burton Elementary
Cajon Valley Union
Cajon Valley Union
Cajon Valley Union Elementary
Calistoga Joint Unified
Capistrano Unified
Capistrano Unified
Cardiff Elementary
Carlsbad Unified
Carlsbad Unified
Caruthers
Castaic Elem
Castaic Elementary
Cayucas
Centinela Valley
Central Unified
Central Union High
Centralia Elementary
Chula Vista Elementary
Claremont Unified
Clay Elementary
Clovis Unified
Coalinga-Huron
Coronado Unified
Covina Valley
Cypress Elem
Dehesa Elementary
Del Mar Union Elementary
Dinuba Unified
Eastern Sierra Unified
Eastside Union Elementary
El Monte Union High
Encinitas Union Elementary
Escalon Unified
Escondido Union Elementary
Escondido Union High
Exeter Elementary
Exeter High
Exeter Unified
Fallbrook Elementary
Fallbrook High
Fallbrook Union Elementary
Fallbrook Union High
Fillmore Unified
Firebaugh-Las Deltas
Fresno Unified
Fullerton Union High
Glendale
Glendale Unified
Golden Plains
Goleta Unified
Greenfield
Grossmont Union High
Hawthorn Elementary
Hughson Unified
Inglewood Unified
Irvine Unified
Jamul-Dulzura Union
Julian Union Elementary
Julian Union High
Kerman Unified
Kern High
Keyes Union
Kings Canyon Unified
Kings River
Kingsburg Elementary
Kingsburg High
La Mesa Spring Valley
La Mesa-Spring Valley
Lake Elsinore
Lakeside Union Elementary
Lakeside Union School
Lancaster Elementary
Lawndale Elem
Lawndale Elementary
Lemon Grove Elementary
Lindsay Unified
Los Alamitos Unified
Lowell Joint Union

Lucia Mar Unified
Madera Unified
Magnolia Elementary
Merced City Elementary
Merced Union High School District
Modesto City Schools
Modesto City Schools
Modoc Unified
Monson Soltana
Morgan Hill Unified
Morongo Unified
Mountain Empire
Napa Valley Unified
National Elementary
New Jerusalem
Newhall Elementary
Newman Crows Landing
Oak Grove Elementary
Oceanside Unified
Oceanside Unified
Pacific Union
Palo Verde
Panama Buena Vista
Pasadena Unified
Perris Union High
Pixley Union
Placentia Yorba Linda
Pleasant View
Pomona Unified
Porterville Unified
Poway Unified
Poway USD
Ramona Unified
Ramona Unified
Rancho Santa Fe Elementary
Redlands Unified
Redwood City Schools
Richland School District
Riverbank
Riverdale Unified
Rosemead Unified
Salida Union
San Benito High
San Dieguito
San Dieguito Union High
San Marcos Unified
San Pasqual Union Elementary
San Ramon Unified
San Ysidro Elementary
Santa Cruz City Schools
Santa Monica Unified
Santee Elementary
Selma Unified
Sequoia Union High
Sequoia Union High
Simi Valley Unified
Solana Beach Elementary
South Bay Union
South Pasadena Unified
South SF Unified
Spencer Valley Elementary
Strathmore Elementary
Sundale Union Elementary
Sweetwater Union High
Tulare City Elementary
Tulare City High
Tulelake Basin
Turlock Unified
Tustin Unified
Twin Rivers Unified
Vacaville Unified
Vallecitos Elementary
Valley Center Pauma Unified
Victor School District
Visalia Unified
Vista Unified
Walnut Valley Water
Warner Unified
Washington Unified
Washington Union
Waterford Union
West Contra Costa USD
West Fresno Elementary
Westminster Elem
Whittier City Schools
Whittier Union High
Whittier Union High
Woodlake Union

NDC
National Demographics Corporation

Douglas M. Johnson, Ph.D.

Districting / Redistricting Clients 2021/2022

States

Arizona 2021 Independent Redistricting Commission
Ohio Redistricting Commission, 2022

Counties

Fresno
Graham
Greenlee
Kings
Marin
Merced
Mohave
Navajo
Nevada
Sacramento
San Benito
San Mateo
Santa Barbara
Sonoma
Yuma

Cities

Anaheim
Apple Valley
Arcadia
Arroyo Grande
Bellflower
Brea
Buckeye
Buellton
Buena Park
Camarillo
Campbell
Carlsbad
Ceres
Chino
Chino Hills
Chula Vista
Citrus Heights
Claremont City
Costa Mesa
Dana Point
Dixon
Downey
Duarte
Dublin
El Cajon
El Monte City
Elk Grove City
Encinitas
Exeter
Fairfield
Folsom
Fontana
Fremont
Fresno
Fullerton
Glendale Az
Glendora
Goleta
Greenfield
Grover Beach
Half Moon Bay
Hesperia
Highland
Imperial Beach
Indio
Inglewood
Jurupa Valley
Kerman
King City
Kingsburg
La Mirada
La Palma
La Verne
Lake Elsinore
Lakewood
Lemoore
Lodi
Lompoc
Los Alamitos
Los Banos
Manteca
Marina
Merced
Monterey Park
Moorpark
Moreno Valley
Morgan Hill
Newport Beach
Novato
Orange
Oxnard
Pacifica
Palmdale
Pasadena
Paso Robles
Patterson
Placentia
Pomona
Poway
Rancho Cucamonga
Redlands
Reedley
Richmond
Riverbank
San Bruno
San Dimas
San Rafael City
Sanger
Santa Barbara
Santa Cruz
Santa Maria
Seal Beach
Selma
Simi Valley
Solana Beach
Solvang
South Pasadena
South San Francisco
Stockton
Sunnyvale
Temecula
Torrance
Tulare
Turlock
Twentynine Palms
Union City
Upland
Vallejo
Ventura
Visalia
Vista
West Covina
Westminster
Westminster
Whittier
Wildomar
Woodside

Yuba City
Yucaipa
Yucca Valley

Community College Districts

Antelope Valley
Butte-Glenn
Chaffey
Coast
Glendale
MiraCosta
Ohlone
Palomar
Sierra

School Districts

Ballard
Barstow Unified
Buellton Union
Buena Park
Cajon Valley Union
Carpinteria Unified
Castaic Union
Cayucos Elementary
Centralia Elementary
Claremont Unified
Clovis Unified
Coast Unified
College
Cypress
Dinuba Unified
East Whittier City Schools
El Monte Union High
Elk Grove Unified
Fresno Unified
Fullerton Joint Union High
Glendale Unified
Glendora Unified
Grossmont High
Guadalupe Union
Hope Elementary
Hughes Elizabeth Lakes Union
Huntington Beach City Schools
Los Alamitos Unified
Lowell Joint
Lucia Mar Unified
Magnolia
Murdoc Joint Unified
Orange County Board of Education
Pacific Grove Unified
Ramona Unified
Roseville Joint Union High
San Luis Coastal Unified
San Mateo Foster City Schools
San Mateo Union High
San Ramon Unified
Santa Cruz City Schools
Santa Maria Joint Union High
South Bay Union
South Pasadena Unified
Standard
Tehachapi Unified
Tuolumne County Board of Education
Turlock Unified
Tustin Unified
Vista Unified
Westminster
Whittier City Schools

Special Districts

Buena Park Library District
Camarillo Health Care District
Cambria Community Healthcare District
Carpinteria Valley Water
Cayucos Sanitary District
Central Fire Protection District of Santa Cruz County
Chino Valley Fire District
Del Puerto Health Care District
Desert Health Care District
East Bay Regional Park District
Fallbrook Healthcare
Lake Arrowhead Community Services District
Leucadia Wastewater District
Monterey Airport District
Oceano Community Services District
Palomar Healthcare
Pleasant Valley Recreation & Park District
San Miguel Fire Protection District
Santa Clarita Valley Water
Santa Cruz Port District
South Coast Water District
Tri-City Healthcare
Valley-Wide Recreation
Westside Community Health

EXHIBIT 2

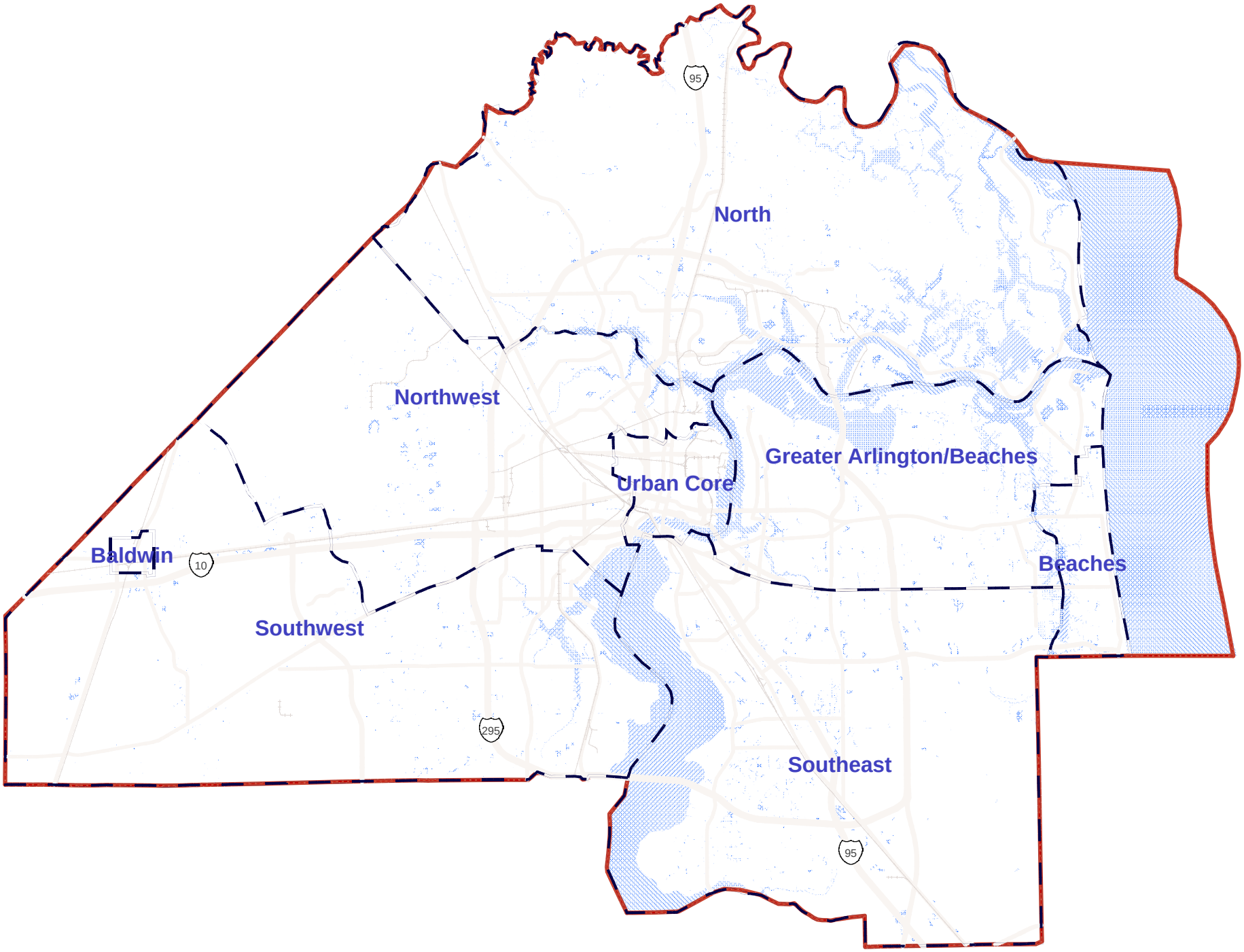

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EXHIBIT 3

ORANGE

DRAFT

COUNCIL DISTRICT

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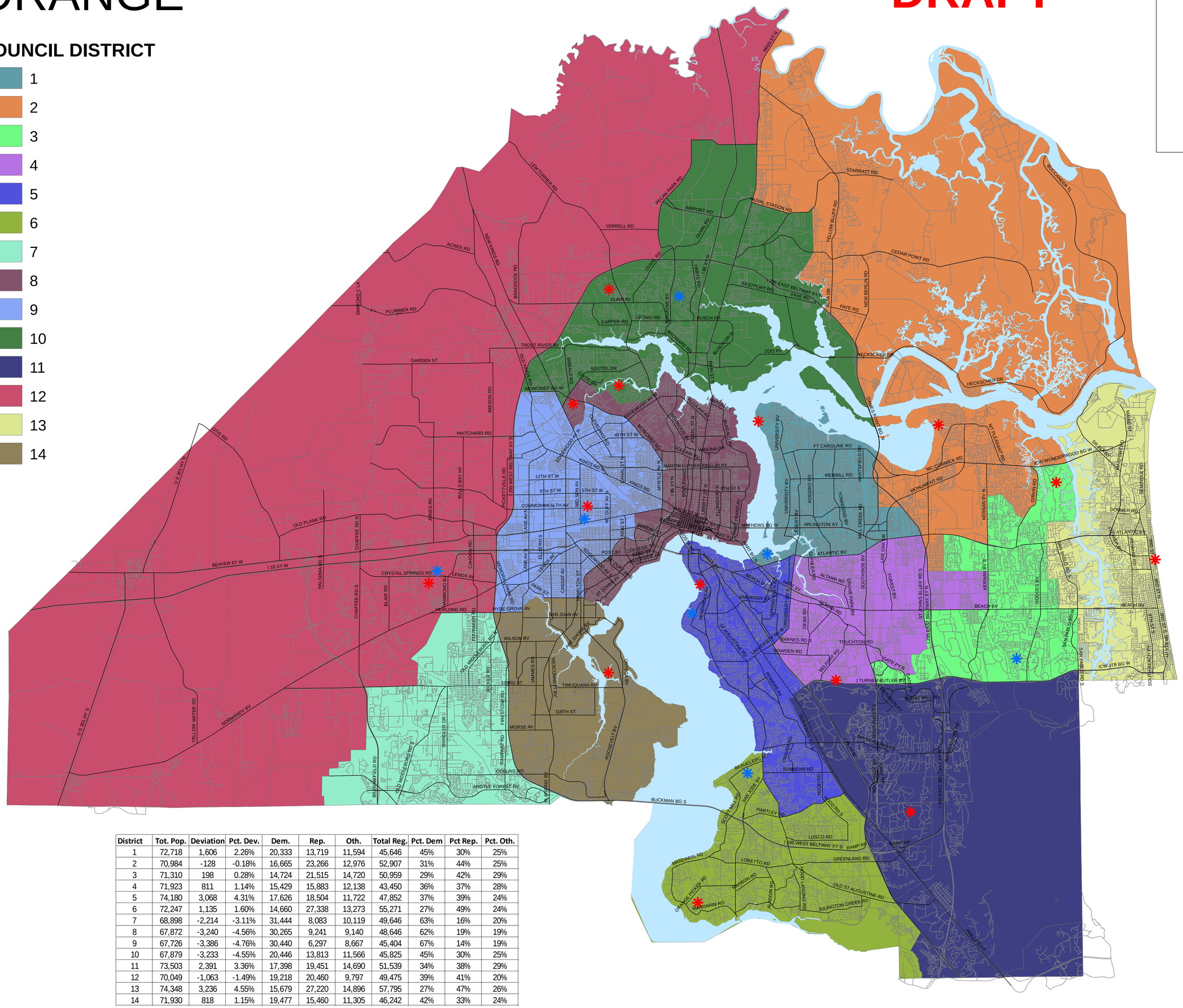

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	45%	30%	25%
2	70,984	-128	-0.18%	16,665	23,266	12,976	52,907	31%	44%	25%
3	71,310	198	0.28%	14,724	21,515	14,720	50,959	29%	42%	29%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	36%	37%	28%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	37%	39%	24%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	27%	49%	24%
7	68,898	-2,214	-3.11%	31,444	8,083	10,119	49,646	63%	16%	20%
8	67,872	-3,240	-4.56%	30,265	9,241	9,140	48,646	62%	19%	19%
9	67,726	-3,386	-4.76%	30,440	6,297	8,667	45,404	67%	14%	19%
10	67,879	-3,233	-4.55%	20,446	13,813	11,566	45,825	45%	30%	25%
11	73,503	2,391	3.36%	17,398	19,451	14,690	51,539	34%	38%	29%
12	70,049	-1,063	-1.49%	19,218	20,460	9,797	49,475	39%	41%	20%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27%	47%	26%
14	71,930	818	1.15%	19,477	15,460	11,305	46,242	42%	33%	24%

EXHIBIT 4

MAROON

DRAFT

COUNCIL DISTRICT

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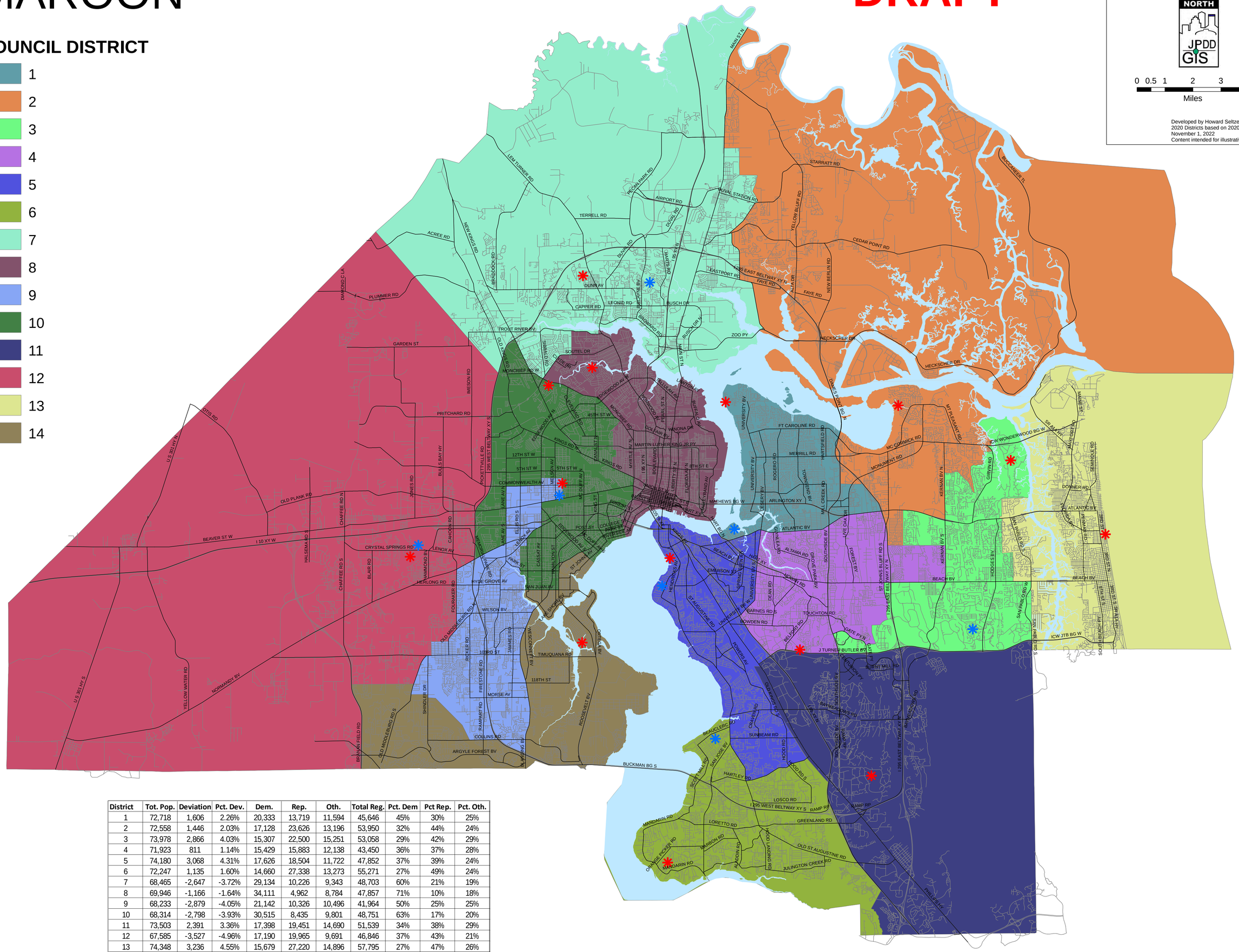

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	45%	30%	25%
2	72,558	1,446	2.03%	17,128	23,626	13,196	53,950	32%	44%	24%
3	73,978	2,866	4.03%	15,307	22,500	15,251	53,058	29%	42%	29%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	36%	37%	28%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	37%	39%	24%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	27%	49%	24%
7	68,465	-2,647	-3.72%	29,134	10,226	9,343	48,703	60%	21%	19%
8	69,946	-1,166	-1.64%	34,111	4,962	8,784	47,857	71%	10%	18%
9	68,233	-2,879	-4.05%	21,142	10,326	10,496	41,964	50%	25%	25%
10	68,314	-2,798	-3.93%	30,515	8,435	9,801	48,751	63%	17%	20%
11	73,503	2,391	3.36%	17,398	19,451	14,690	51,539	34%	38%	29%
12	67,585	-3,527	-4.96%	17,190	19,965	9,691	46,846	37%	43%	21%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27%	47%	26%
14	67,569	-3,543	-4.98%	18,152	18,095	11,728	47,975	38%	38%	24%

EXHIBIT 5

LIME

DRAFT

COUNCIL DISTRICT

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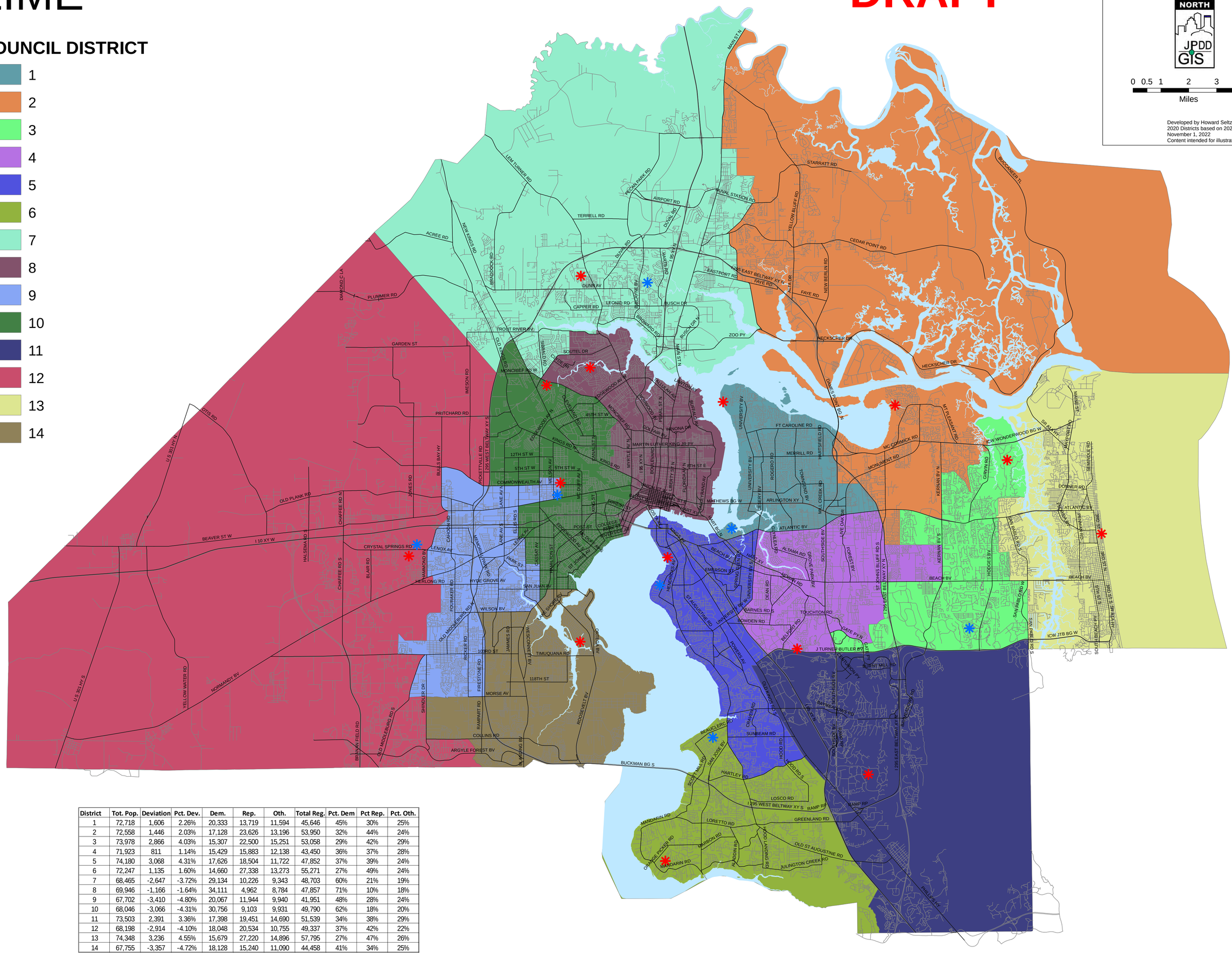

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	45%	30%	25%
2	72,558	1,446	2.03%	17,128	23,626	13,196	53,950	32%	44%	24%
3	73,978	2,866	4.03%	15,307	22,500	15,251	53,058	29%	42%	29%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	36%	37%	28%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	37%	39%	24%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	27%	49%	24%
7	68,465	-2,647	-3.72%	29,134	10,226	9,343	48,703	60%	21%	19%
8	69,946	-1,166	-1.64%	34,111	4,962	8,784	47,857	71%	10%	18%
9	67,702	-3,410	-4.80%	20,067	11,944	9,940	41,951	48%	28%	24%
10	68,046	-3,066	-4.31%	30,756	9,103	9,931	49,790	62%	18%	20%
11	73,503	2,391	3.36%	17,398	19,451	14,690	51,539	34%	38%	29%
12	68,198	-2,914	-4.10%	18,048	20,534	10,755	49,337	37%	42%	22%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27%	47%	26%
14	67,755	-3,357	-4.72%	18,128	15,240	11,090	44,458	41%	34%	25%

EXHIBIT 6

MAROON IIA

DRAFT

COUNCIL DISTRICT

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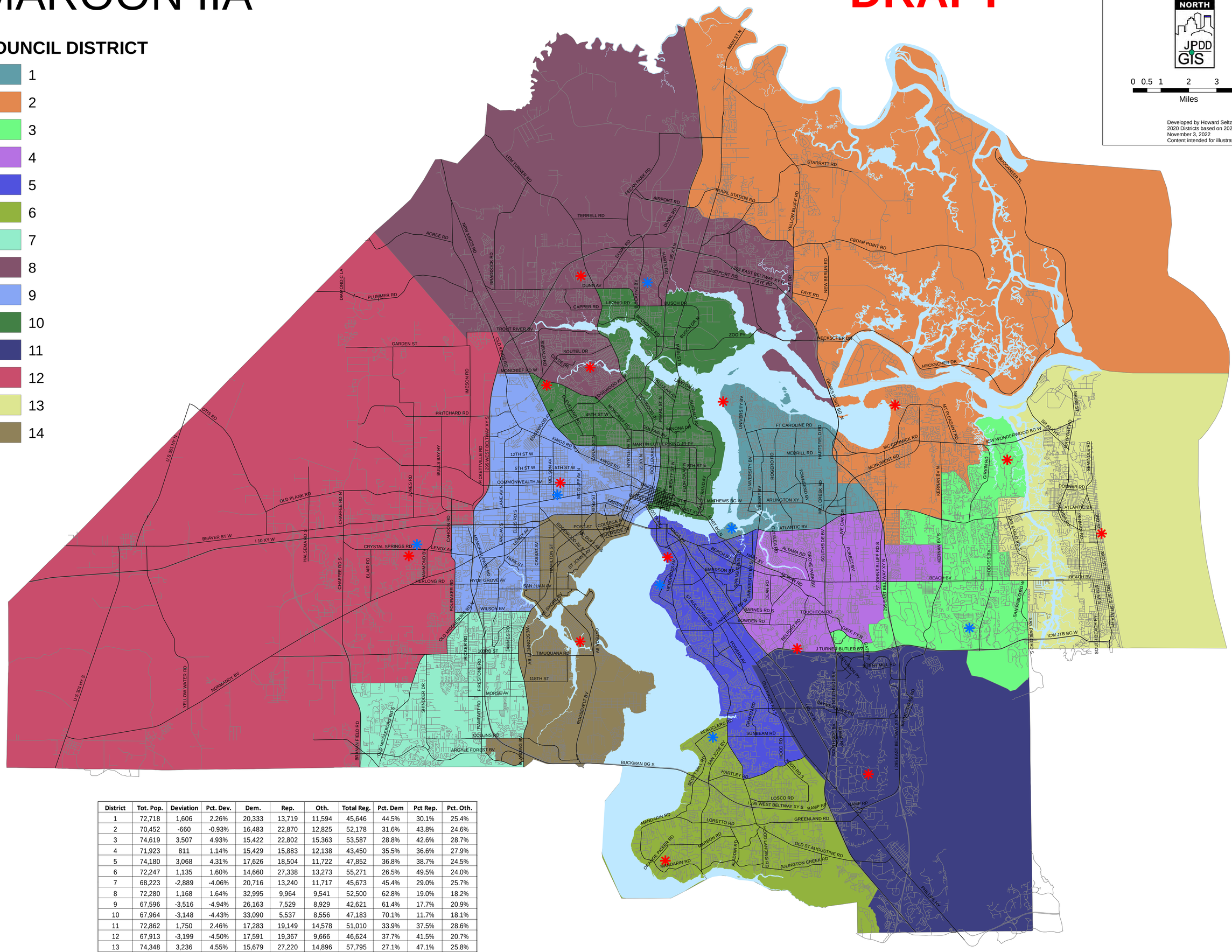

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	70,452	-660	-0.93%	16,483	22,870	12,825	52,178	31.6%	43.8%	24.6%
3	74,619	3,507	4.93%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	68,223	-2,889	-4.06%	20,716	13,240	11,717	45,673	45.4%	29.0%	25.7%
8	72,280	1,168	1.64%	32,995	9,964	9,541	52,500	62.8%	19.0%	18.2%
9	67,596	-3,516	-4.94%	26,163	7,529	8,929	42,621	61.4%	17.7%	20.9%
10	67,964	-3,148	-4.43%	33,090	5,537	8,556	47,183	70.1%	11.7%	18.1%
11	72,862	1,750	2.46%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,913	-3,199	-4.50%	17,591	19,367	9,666	46,624	37.7%	41.5%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,242	-2,870	-4.04%	20,334	17,128	11,805	49,267	41.3%	34.8%	24.0%

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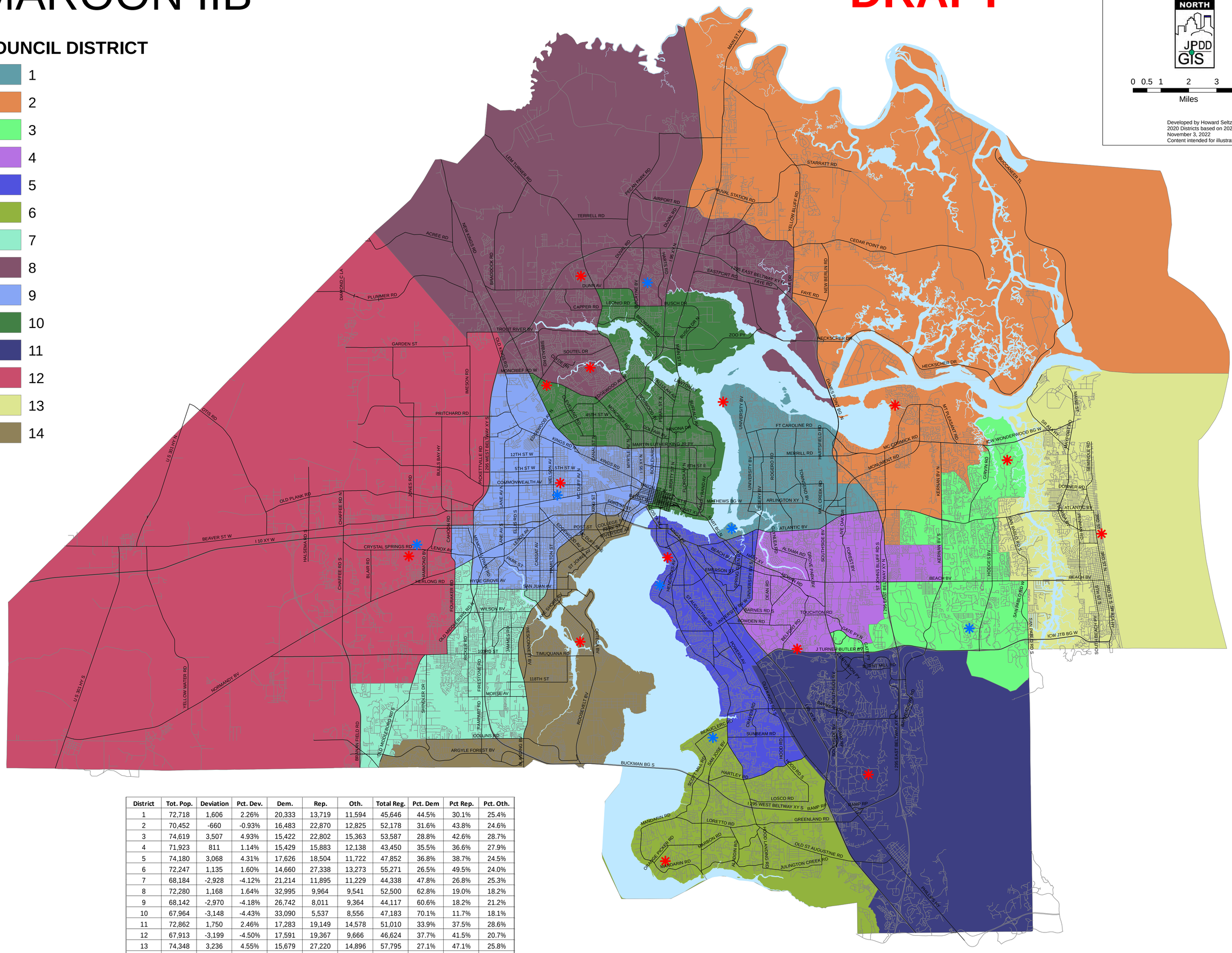

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	70,452	-660	-0.93%	16,483	22,870	12,825	52,178	31.6%	43.8%	24.6%
3	74,619	3,507	4.93%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	68,184	-2,928	-4.12%	21,214	11,895	11,229	44,338	47.8%	26.8%	25.3%
8	72,280	1,168	1.64%	32,995	9,964	9,541	52,500	62.8%	19.0%	18.2%
9	68,142	-2,970	-4.18%	26,742	8,011	9,364	44,117	60.6%	18.2%	21.2%
10	67,964	-3,148	-4.43%	33,090	5,537	8,556	47,183	70.1%	11.7%	18.1%
11	72,862	1,750	2.46%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,913	-3,199	-4.50%	17,591	19,367	9,666	46,624	37.7%	41.5%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	67,735	-3,377	-4.75%	19,257	17,991	11,858	49,106	39.2%	36.6%	24.1%

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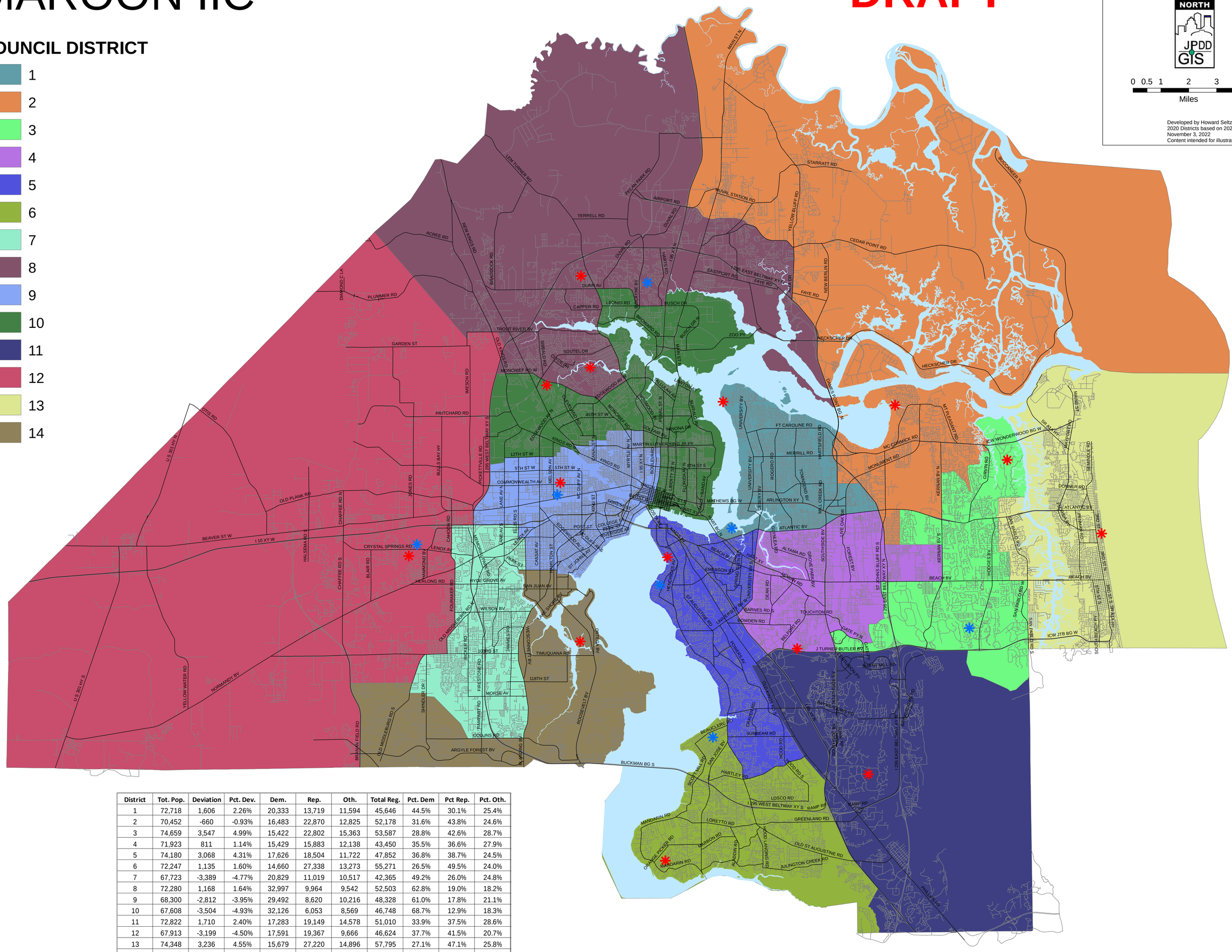

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	70,452	-660	-0.93%	16,483	22,870	12,825	52,178	31.6%	43.8%	24.6%
3	74,659	3,547	4.99%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	67,723	-3,389	-4.77%	20,829	11,019	10,517	42,365	49.2%	26.0%	24.8%
8	72,280	1,168	1.64%	32,997	9,964	9,542	52,503	62.8%	19.0%	18.2%
9	68,300	-2,812	-3.95%	29,492	8,620	10,216	48,328	61.0%	17.8%	21.1%
10	67,608	-3,504	-4.93%	32,126	6,053	8,569	46,748	68.7%	12.9%	18.3%
11	72,822	1,710	2.40%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,913	-3,199	-4.50%	17,591	19,367	9,666	46,624	37.7%	41.5%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,533	-2,579	-3.63%	17,923	17,747	11,719	47,389	37.8%	37.4%	24.7%

EXHIBIT 7

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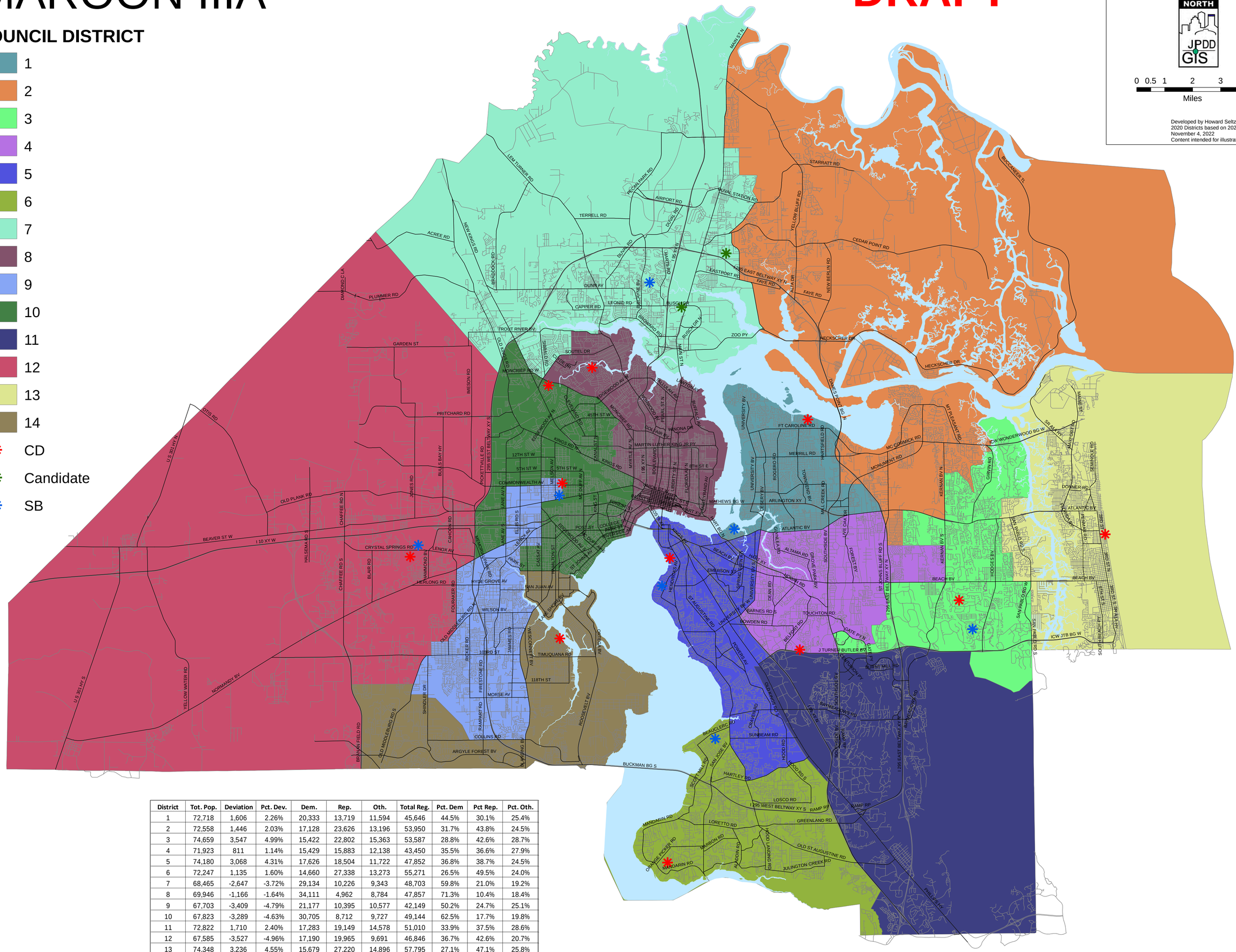

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	72,558	1,446	2.03%	17,128	23,626	13,196	53,950	31.7%	43.8%	24.5%
3	74,659	3,547	4.99%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	68,465	-2,647	-3.72%	29,134	10,226	9,343	48,703	59.8%	21.0%	19.2%
8	69,946	-1,166	-1.64%	34,111	4,962	8,784	47,857	71.3%	10.4%	18.4%
9	67,703	-3,409	-4.79%	21,177	10,395	10,577	42,149	50.2%	24.7%	25.1%
10	67,823	-3,289	-4.63%	30,705	8,712	9,727	49,144	62.5%	17.7%	19.8%
11	72,822	1,710	2.40%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,585	-3,527	-4.96%	17,190	19,965	9,691	46,846	36.7%	42.6%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,590	-2,522	-3.55%	17,927	17,749	11,721	47,397	37.8%	37.4%	24.7%

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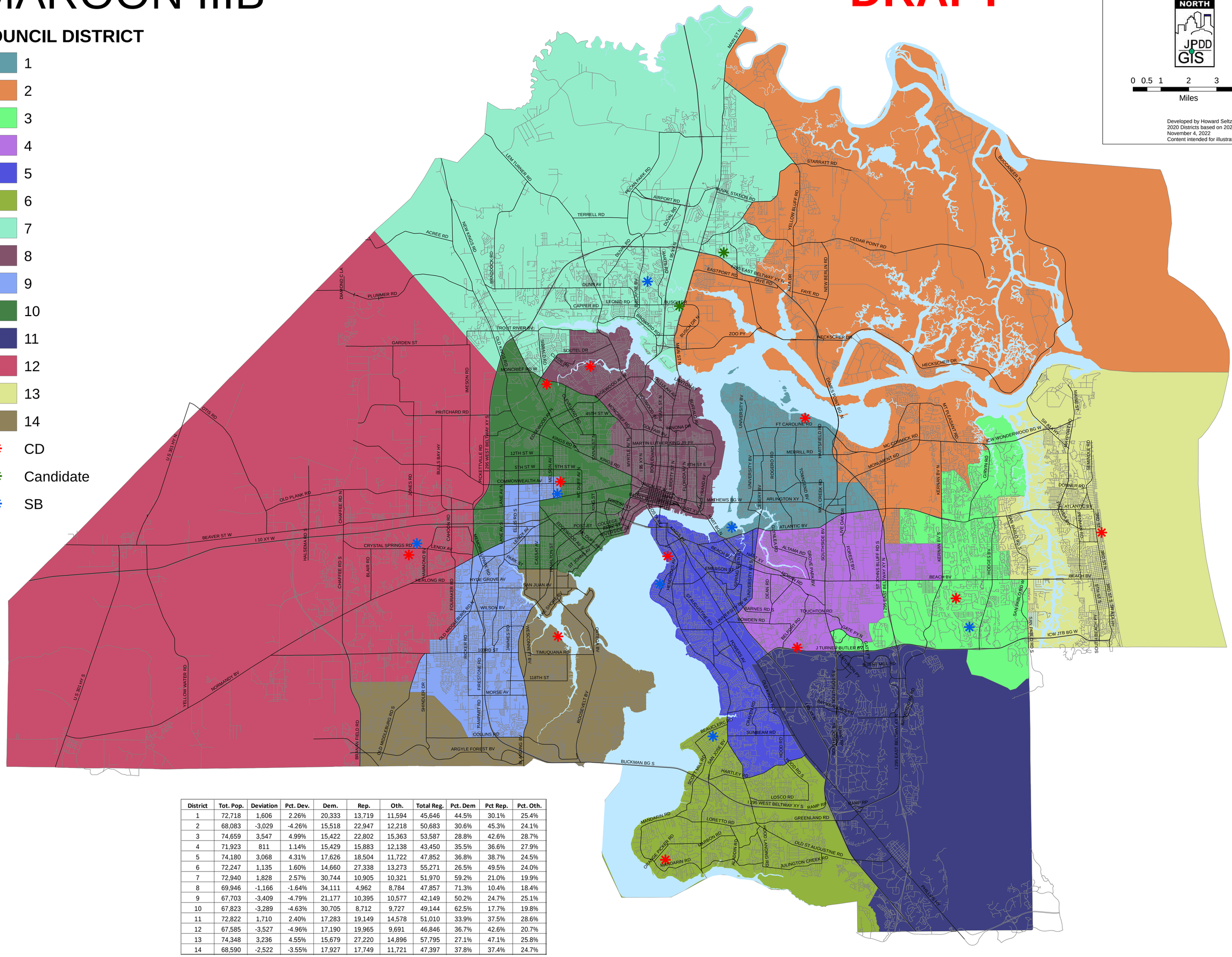

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	68,083	-3,029	-4.26%	15,518	22,947	12,218	50,683	30.6%	45.3%	24.1%
3	74,659	3,547	4.99%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	72,940	1,828	2.57%	30,744	10,905	10,321	51,970	59.2%	21.0%	19.9%
8	69,946	-1,166	-1.64%	34,111	4,962	8,784	47,857	71.3%	10.4%	18.4%
9	67,703	-3,409	-4.79%	21,177	10,395	10,577	42,149	50.2%	24.7%	25.1%
10	67,823	-3,289	-4.63%	30,705	8,712	9,727	49,144	62.5%	17.7%	19.8%
11	72,822	1,710	2.40%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,585	-3,527	-4.96%	17,190	19,965	9,691	46,846	36.7%	42.6%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,590	-2,522	-3.55%	17,927	17,749	11,721	47,397	37.8%	37.4%	24.7%

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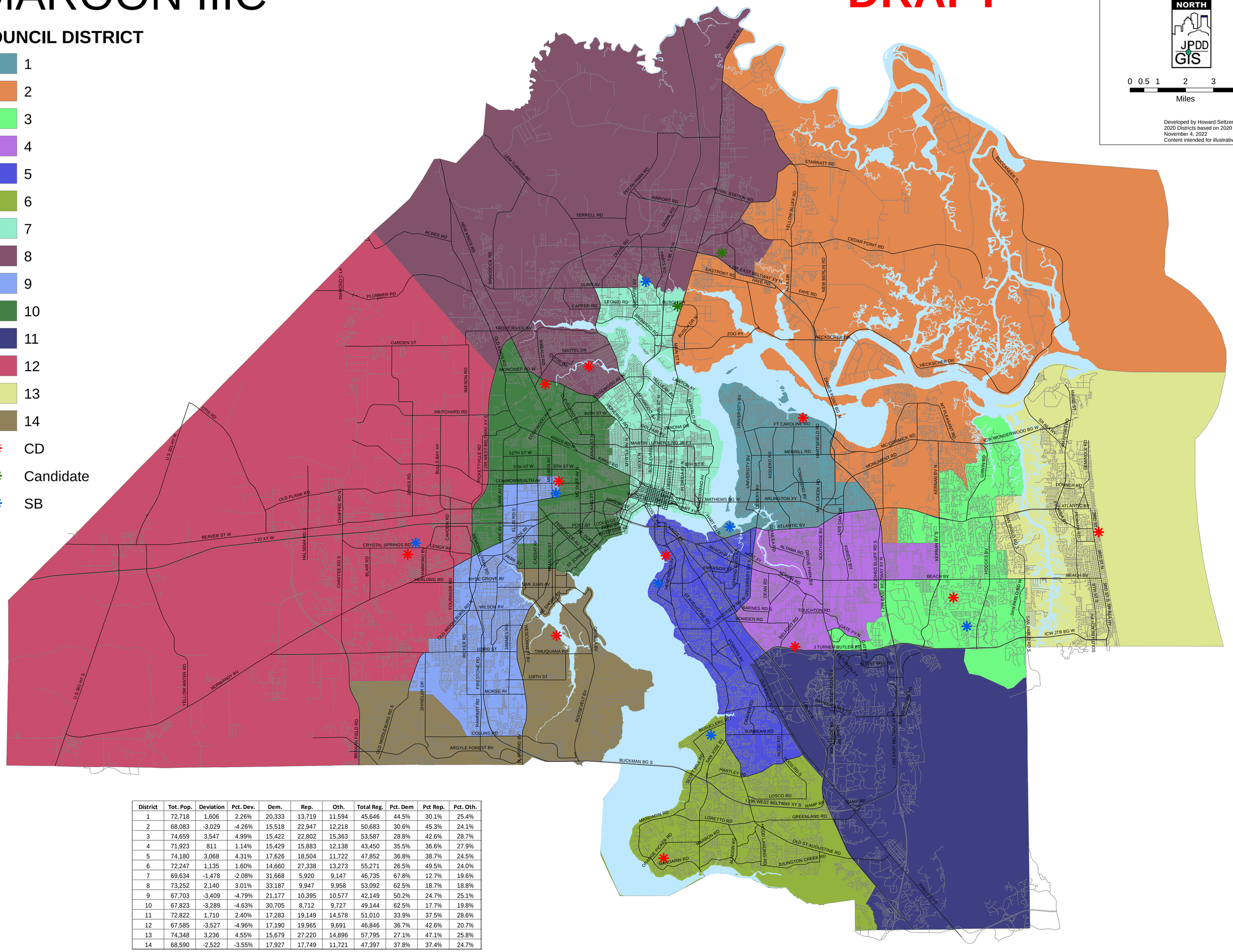

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	68,083	-3,029	-4.26%	15,518	22,947	12,218	50,683	30.6%	45.3%	24.1%
3	74,659	3,547	4.99%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	69,634	-1,478	-2.08%	31,668	5,920	9,147	46,735	67.8%	12.7%	19.6%
8	73,252	2,140	3.01%	33,187	9,947	9,958	53,092	62.5%	18.7%	18.8%
9	67,703	-3,409	-4.79%	21,177	10,395	10,577	42,149	50.2%	24.7%	25.1%
10	67,823	-3,289	-4.63%	30,705	8,712	9,727	49,144	62.5%	17.7%	19.8%
11	72,822	1,710	2.40%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,585	-3,527	-4.96%	17,190	19,965	9,691	46,846	36.7%	42.6%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,590	-2,522	-3.55%	17,927	17,749	11,721	47,397	37.8%	37.4%	24.7%

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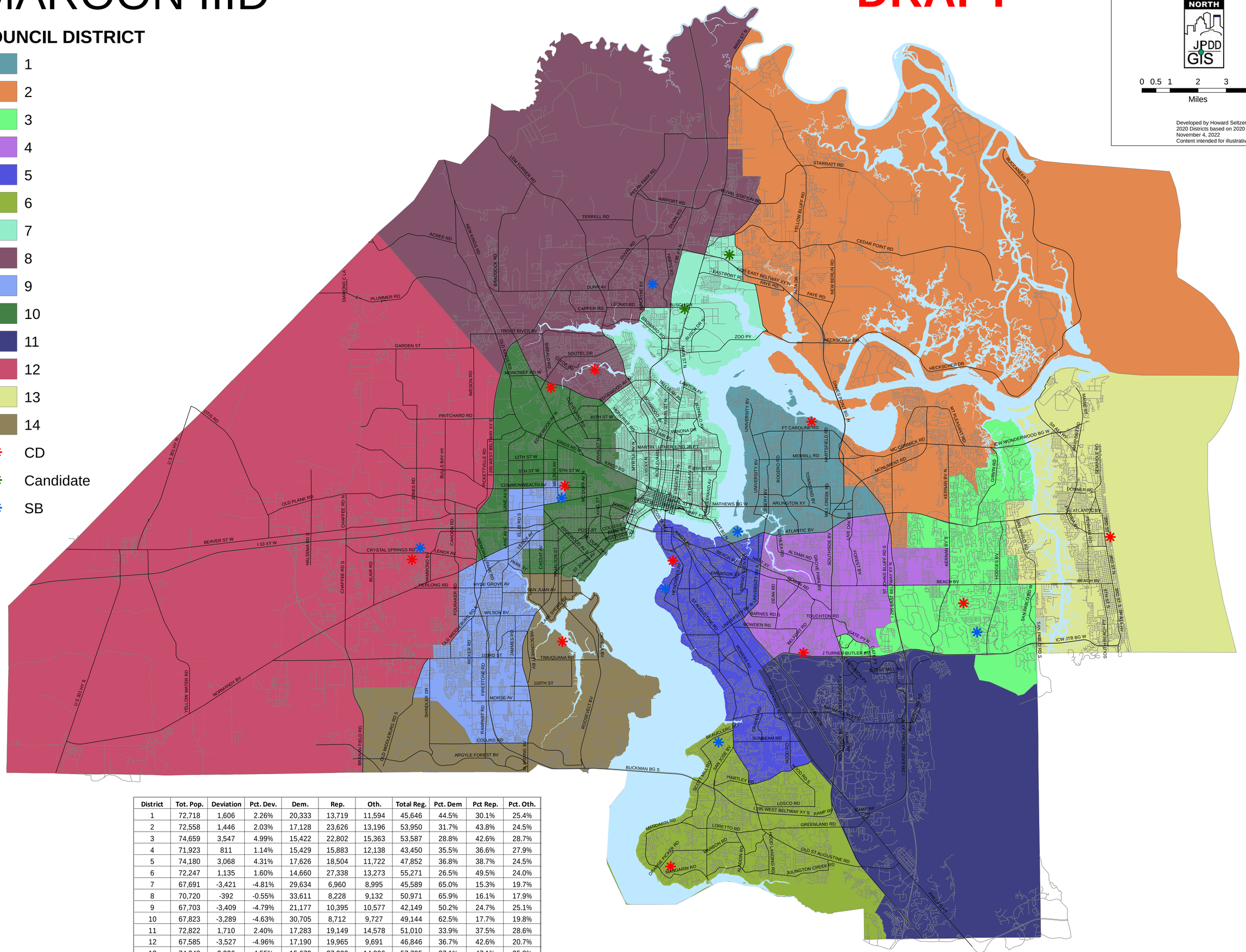

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	72,558	1,446	2.03%	17,128	23,626	13,196	53,950	31.7%	43.8%	24.5%
3	74,659	3,547	4.99%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	67,691	-3,421	-4.81%	29,634	6,960	8,995	45,589	65.0%	15.3%	19.7%
8	70,720	-392	-0.55%	33,611	8,228	9,132	50,971	65.9%	16.1%	17.9%
9	67,703	-3,409	-4.79%	21,177	10,395	10,577	42,149	50.2%	24.7%	25.1%
10	67,823	-3,289	-4.63%	30,705	8,712	9,727	49,144	62.5%	17.7%	19.8%
11	72,822	1,710	2.40%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,585	-3,527	-4.96%	17,190	19,965	9,691	46,846	36.7%	42.6%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,590	-2,522	-3.55%	17,927	17,749	11,721	47,397	37.8%	37.4%	24.7%

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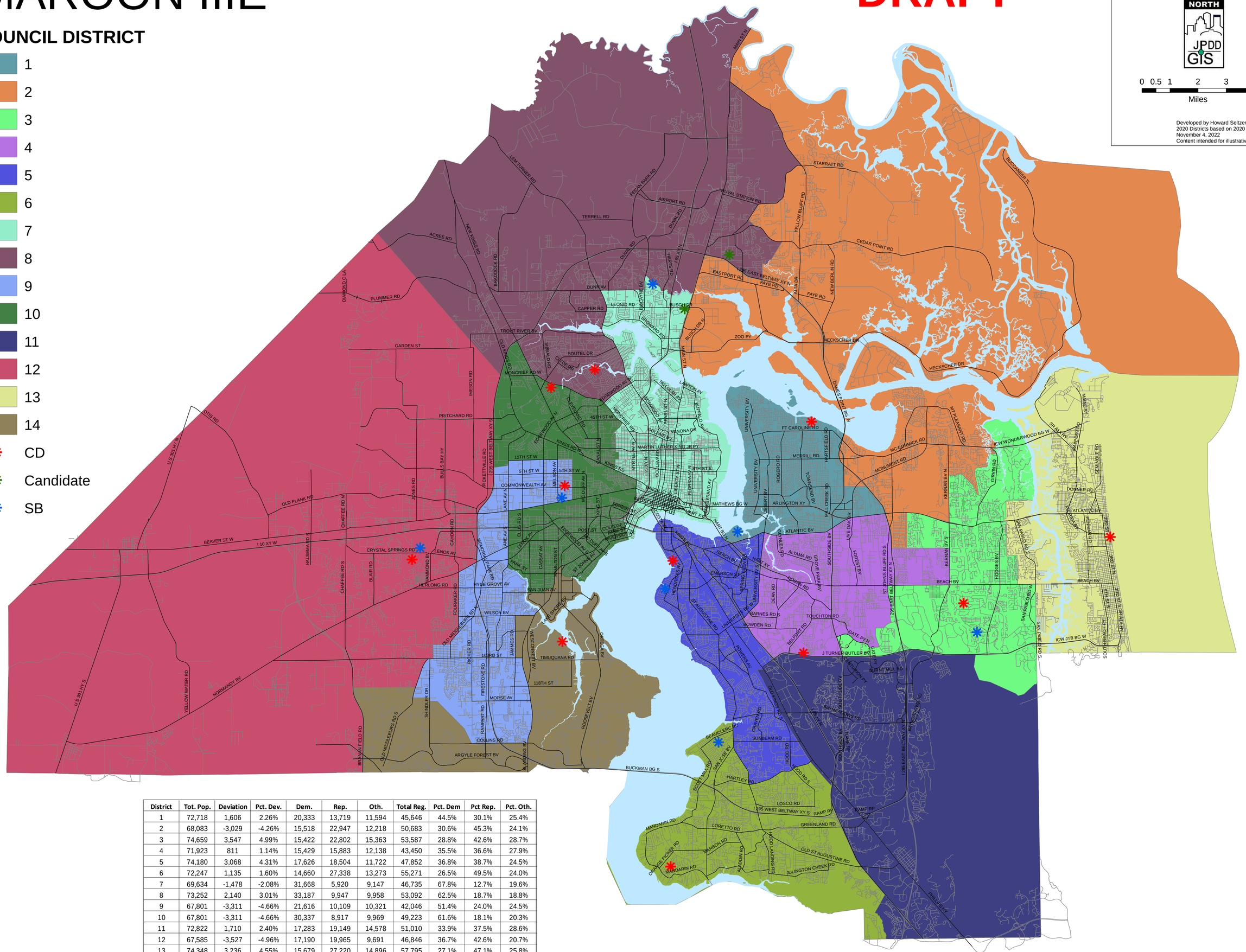

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	68,083	-3,029	-4.26%	15,518	22,947	12,218	50,683	30.6%	45.3%	24.1%
3	74,659	3,547	4.99%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	69,634	-1,478	-2.08%	31,668	5,920	9,147	46,735	67.8%	12.7%	19.6%
8	73,252	2,140	3.01%	33,187	9,947	9,958	53,092	62.5%	18.7%	18.8%
9	67,801	-3,311	-4.66%	21,616	10,109	10,321	42,046	51.4%	24.0%	24.5%
10	67,801	-3,311	-4.66%	30,337	8,917	9,969	49,223	61.6%	18.1%	20.3%
11	72,822	1,710	2.40%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,585	-3,527	-4.96%	17,190	19,965	9,691	46,846	36.7%	42.6%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,514	-2,598	-3.65%	17,856	17,830	11,735	47,421	37.7%	37.6%	24.7%

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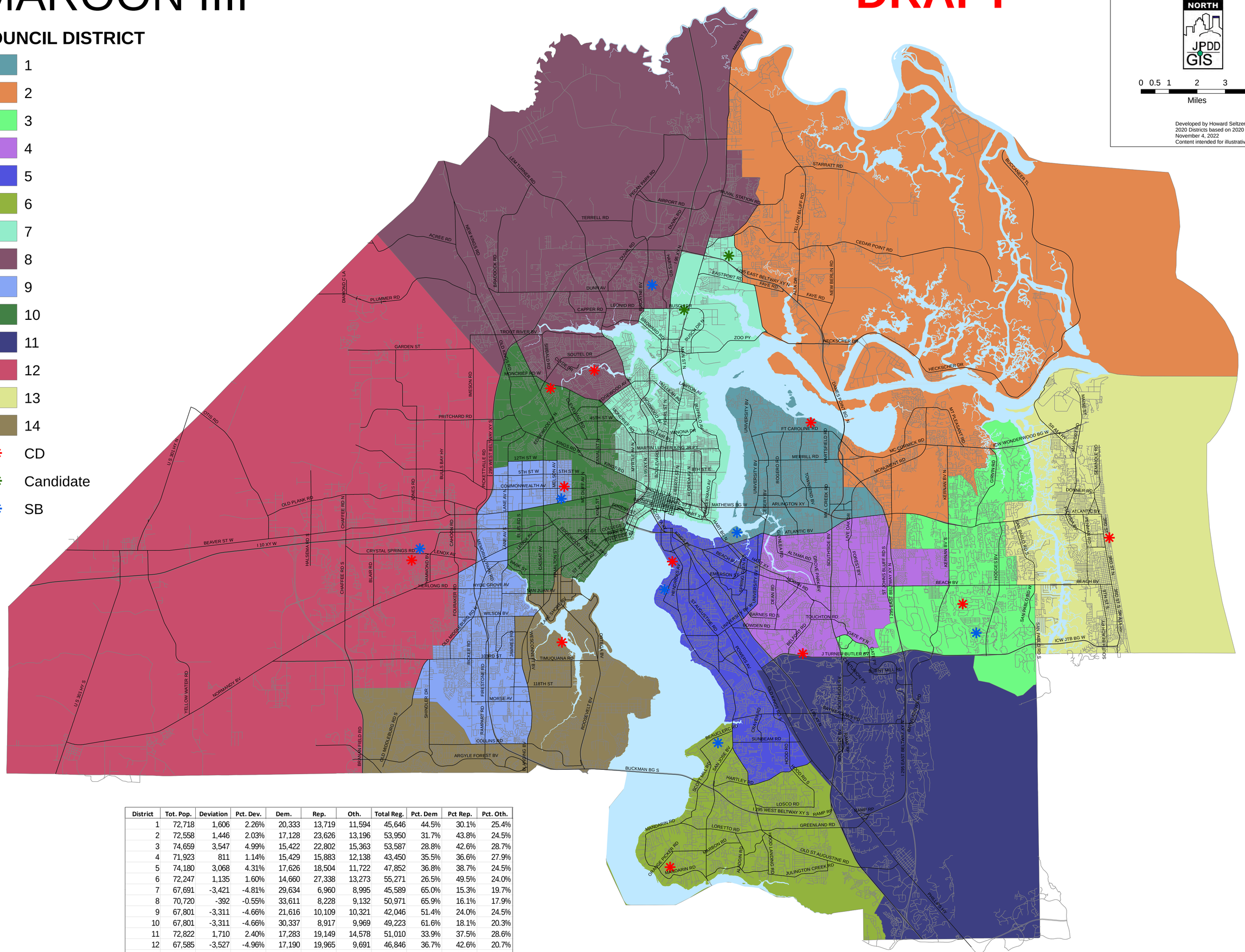

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	72,558	1,446	2.03%	17,128	23,626	13,196	53,950	31.7%	43.8%	24.5%
3	74,659	3,547	4.99%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	67,691	-3,421	-4.81%	29,634	6,960	8,995	45,589	65.0%	15.3%	19.7%
8	70,720	-392	-0.55%	33,611	8,228	9,132	50,971	65.9%	16.1%	17.9%
9	67,801	-3,311	-4.66%	21,616	10,109	10,321	42,046	51.4%	24.0%	24.5%
10	67,801	-3,311	-4.66%	30,337	8,917	9,969	49,223	61.6%	18.1%	20.3%
11	72,822	1,710	2.40%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,585	-3,527	-4.96%	17,190	19,965	9,691	46,846	36.7%	42.6%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,514	-2,598	-3.65%	17,856	17,830	11,735	47,421	37.7%	37.6%	24.7%

EXHIBIT 8

MAROON IIIA FIX

DRAFT

- CD
- Candidate
- SB

COUNCIL DISTRICT

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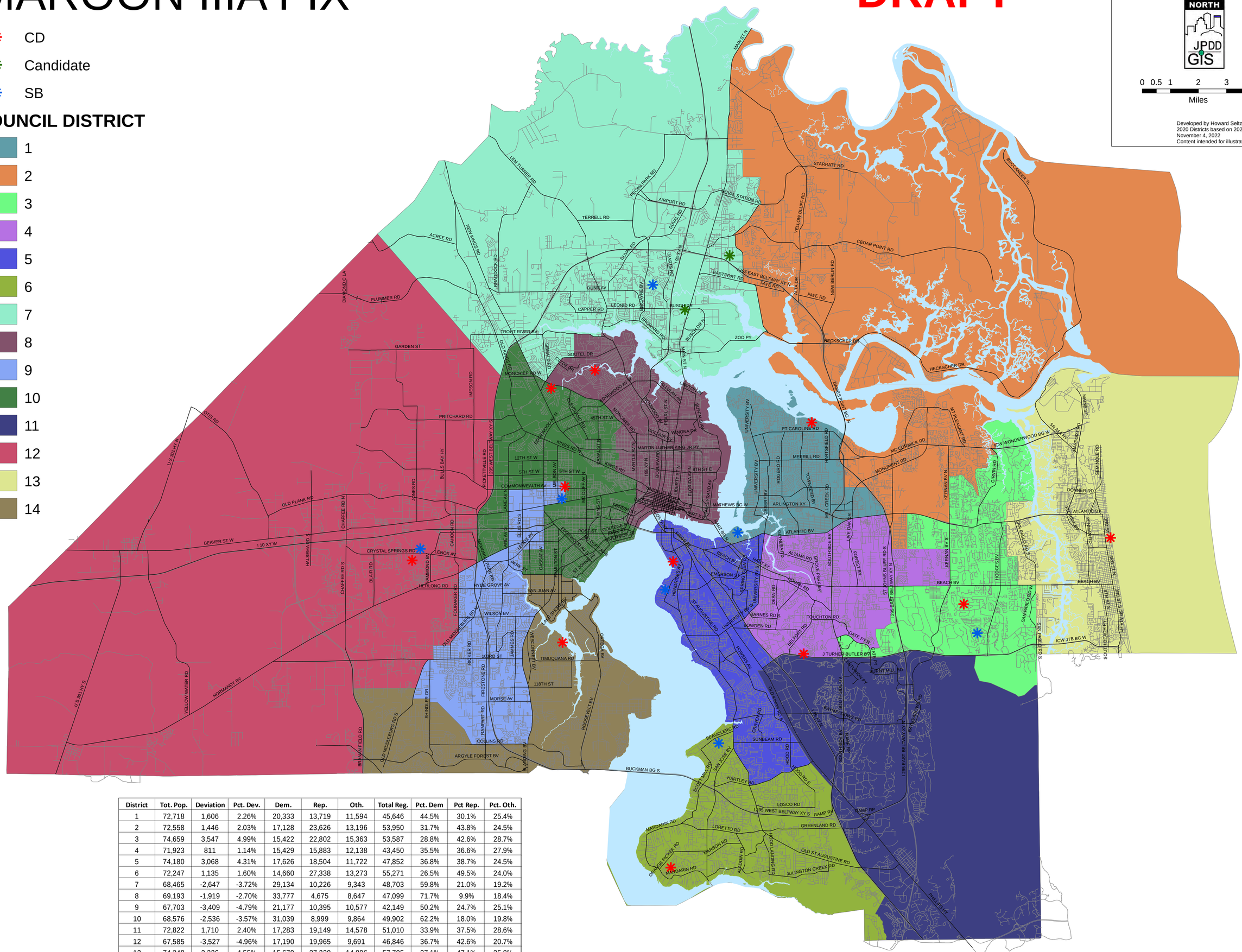

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	72,558	1,446	2.03%	17,128	23,626	13,196	53,950	31.7%	43.8%	24.5%
3	74,659	3,547	4.99%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	68,465	-2,647	-3.72%	29,134	10,226	9,343	48,703	59.8%	21.0%	19.2%
8	69,193	-1,919	-2.70%	33,777	4,675	8,647	47,099	71.7%	9.9%	18.4%
9	67,703	-3,409	-4.79%	21,177	10,395	10,577	42,149	50.2%	24.7%	25.1%
10	68,576	-2,536	-3.57%	31,039	8,999	9,864	49,902	62.2%	18.0%	19.8%
11	72,822	1,710	2.40%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,585	-3,527	-4.96%	17,190	19,965	9,691	46,846	36.7%	42.6%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,590	-2,522	-3.55%	17,927	17,749	11,721	47,397	37.8%	37.4%	24.7%

MAROON IIIE FIX

DRAFT

- CD
- Candidate
- SB

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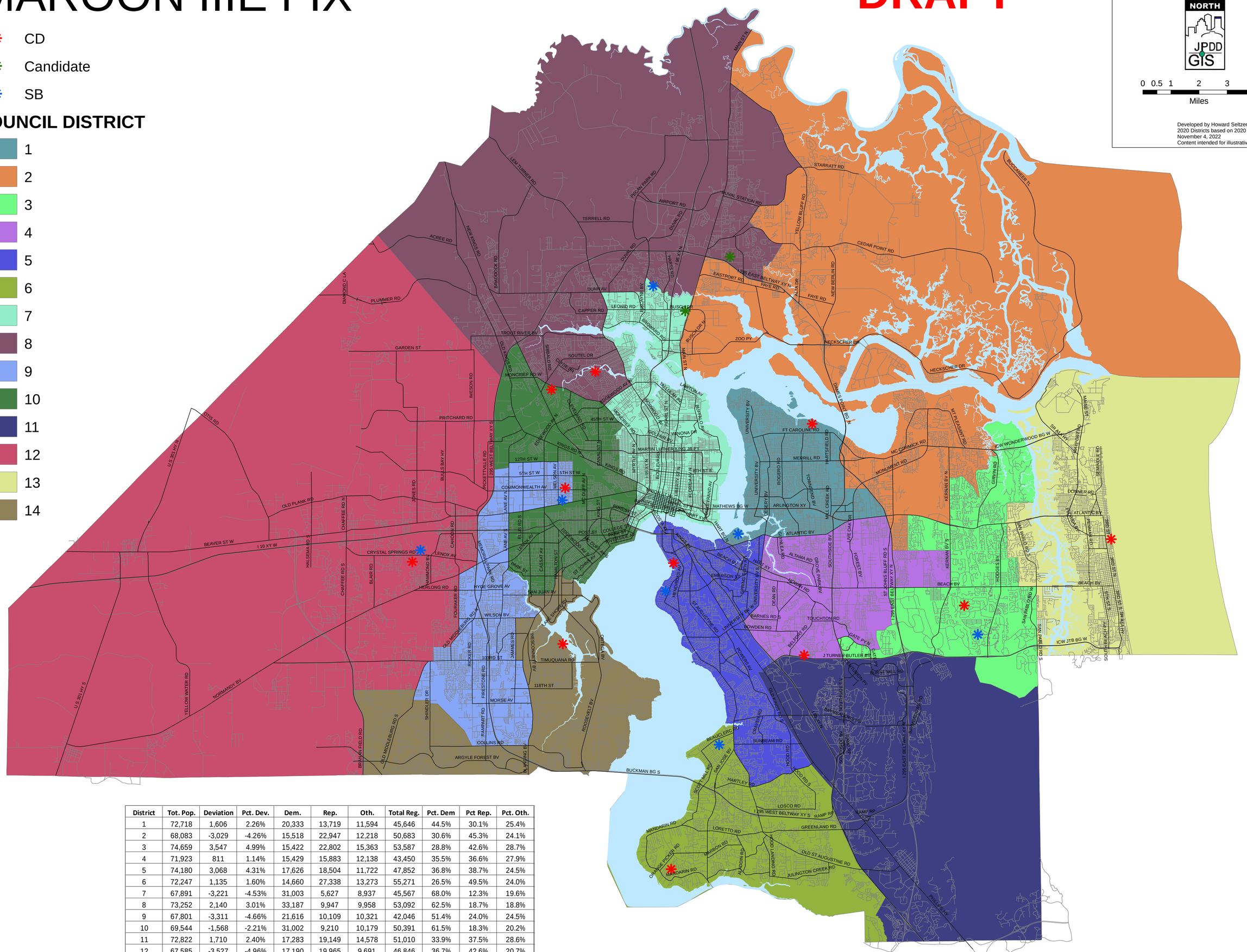

District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	68,083	-3,029	-4.26%	15,518	22,947	12,218	50,683	30.6%	45.3%	24.1%
3	74,659	3,547	4.99%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	67,891	-3,221	-4.53%	31,003	5,627	8,937	45,567	68.0%	12.3%	19.6%
8	73,252	2,140	3.01%	33,187	9,947	9,958	53,092	62.5%	18.7%	18.8%
9	67,801	-3,311	-4.66%	21,616	10,109	10,321	42,046	51.4%	24.0%	24.5%
10	69,544	-1,568	-2.21%	31,002	9,210	10,179	50,391	61.5%	18.3%	20.2%
11	72,822	1,710	2.40%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,585	-3,527	-4.96%	17,190	19,965	9,691	46,846	36.7%	42.6%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,514	-2,598	-3.65%	17,856	17,830	11,735	47,421	37.7%	37.6%	24.7%

MAROON IIIF FIX

DRAFT

- CD
- Candidate
- SB

COUNCIL DISTRICT

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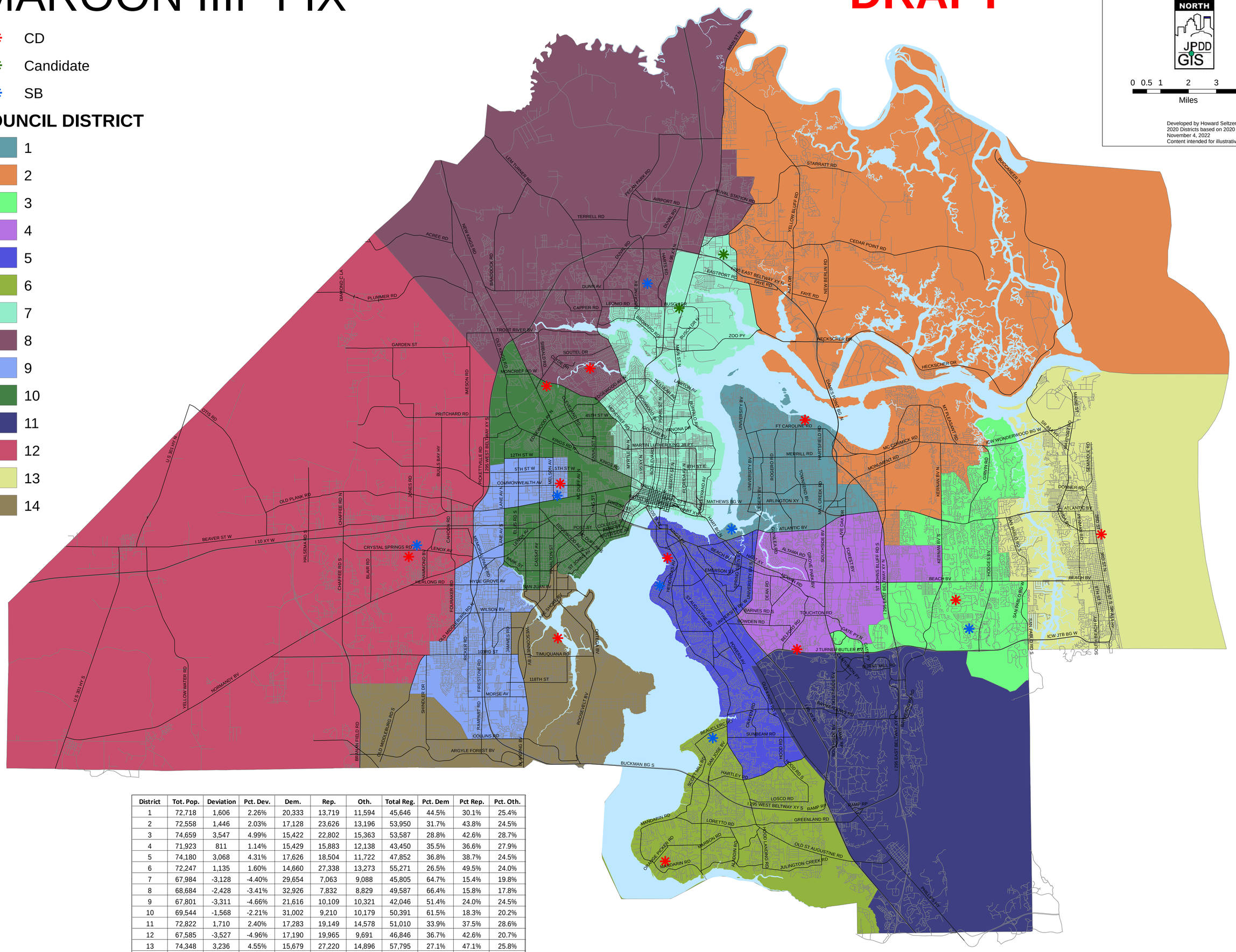


District	Tot. Pop.	Deviation	Pct. Dev.	Dem.	Rep.	Oth.	Total Reg.	Pct. Dem	Pct Rep.	Pct. Oth.
1	72,718	1,606	2.26%	20,333	13,719	11,594	45,646	44.5%	30.1%	25.4%
2	72,558	1,446	2.03%	17,128	23,626	13,196	53,950	31.7%	43.8%	24.5%
3	74,659	3,547	4.99%	15,422	22,802	15,363	53,587	28.8%	42.6%	28.7%
4	71,923	811	1.14%	15,429	15,883	12,138	43,450	35.5%	36.6%	27.9%
5	74,180	3,068	4.31%	17,626	18,504	11,722	47,852	36.8%	38.7%	24.5%
6	72,247	1,135	1.60%	14,660	27,338	13,273	55,271	26.5%	49.5%	24.0%
7	67,984	-3,128	-4.40%	29,654	7,063	9,088	45,805	64.7%	15.4%	19.8%
8	68,684	-2,428	-3.41%	32,926	7,832	8,829	49,587	66.4%	15.8%	17.8%
9	67,801	-3,311	-4.66%	21,616	10,109	10,321	42,046	51.4%	24.0%	24.5%
10	69,544	-1,568	-2.21%	31,002	9,210	10,179	50,391	61.5%	18.3%	20.2%
11	72,822	1,710	2.40%	17,283	19,149	14,578	51,010	33.9%	37.5%	28.6%
12	67,585	-3,527	-4.96%	17,190	19,965	9,691	46,846	36.7%	42.6%	20.7%
13	74,348	3,236	4.55%	15,679	27,220	14,896	57,795	27.1%	47.1%	25.8%
14	68,514	-2,598	-3.65%	17,856	17,830	11,735	47,421	37.7%	37.6%	24.7%

EXHIBIT 9

NDC

Measures of Compactness

	Adopted 2021	Adopted 2022	P1	P2	P3	Adopted 2021	Adopted 2022	P1	P2	P3	Adopted 2021	Adopted 2022	P1	P2	P3
Measure:	Area/ Convex Hull	Area/ Convex Hull	Area/ Convex Hull	Area/ Convex Hull	Area/ Convex Hull	Ehren-burg	Ehren-burg	Ehren-burg	Ehren-burg	Ehren-burg	Length-Width	Length-Width	Length-Width	Length-Width	Length-Width
Sum	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Min	0.54	0.65	0.65	0.65	0.65	0.25	0.21	0.22	0.22	0.22	0.42	0.19	0.19	0.19	0.19
Max	0.94	0.97	0.94	0.94	0.97	0.56	0.57	0.78	0.58	0.58	8.7	4.52	5.67	7.53	7.52
Mean	0.74	0.79	0.8	0.8	0.8	0.4	0.41	0.43	0.42	0.4	3.15	2.37	2.09	2.93	2.65
Std. Dev.	0.12	0.09	0.08	0.08	0.1	0.1	0.11	0.15	0.12	0.11	2.74	1.41	1.67	1.92	1.99
District															
1	0.82	0.82	0.82	0.82	0.82	0.43	0.43	0.43	0.43	0.43	0.47	0.47	0.47	0.47	0.47
2	0.72	0.7	0.79	0.73	0.73	0.52	0.5	0.55	0.58	0.58	1.08	1.43	4.87	3.21	3.21
3	0.67	0.65	0.65	0.65	0.65	0.25	0.21	0.22	0.22	0.22	1.93	3.27	3.27	3.27	3.27
4	0.81	0.81	0.81	0.81	0.81	0.5	0.5	0.5	0.5	0.5	2.17	2.17	2.18	2.18	2.18
5	0.75	0.75	0.75	0.75	0.75	0.35	0.35	0.35	0.35	0.35	2.81	2.81	2.81	2.81	2.81
6	0.79	0.79	0.79	0.79	0.79	0.41	0.41	0.41	0.41	0.41	1.72	1.72	1.72	1.72	1.72
7	0.62	0.79	0.68	0.67	0.67	0.39	0.37	0.31	0.24	0.24	8.68	4.05	1.93	2.51	1.49
8	0.73	0.81	0.83	0.82	0.81	0.32	0.39	0.49	0.47	0.46	2.8	0.91	1.16	1.83	1.83
9	0.54	0.67	0.76	0.81	0.71	0.29	0.29	0.25	0.33	0.32	5.81	4.52	0.84	2.13	1.15
10	0.61	0.77	0.89	0.81	0.85	0.27	0.21	0.41	0.5	0.44	8.7	3.6	2.76	7.53	3.64
11	0.94	0.93	0.94	0.94	0.94	0.56	0.57	0.57	0.57	0.57	0.42	0.19	0.19	0.19	0.19
12	0.9	0.97	0.83	0.9	0.97	0.5	0.47	0.47	0.55	0.47	4.11	1.9	1.14	3.78	1.9
13	0.85	0.85	0.79	0.79	0.79	0.5	0.5	0.28	0.28	0.28	1.87	1.87	5.67	5.67	5.67
14	0.64	0.69	0.93	0.85	0.92	0.31	0.48	0.78	0.39	0.33	1.51	4.23	0.2	3.66	7.52
	The measure is always between 0 and 1, with 1 being the most compact.					The measure is always between 0 and 1, with 1 being the most compact.					A lower number indicates better length-width compactness.				

NDC

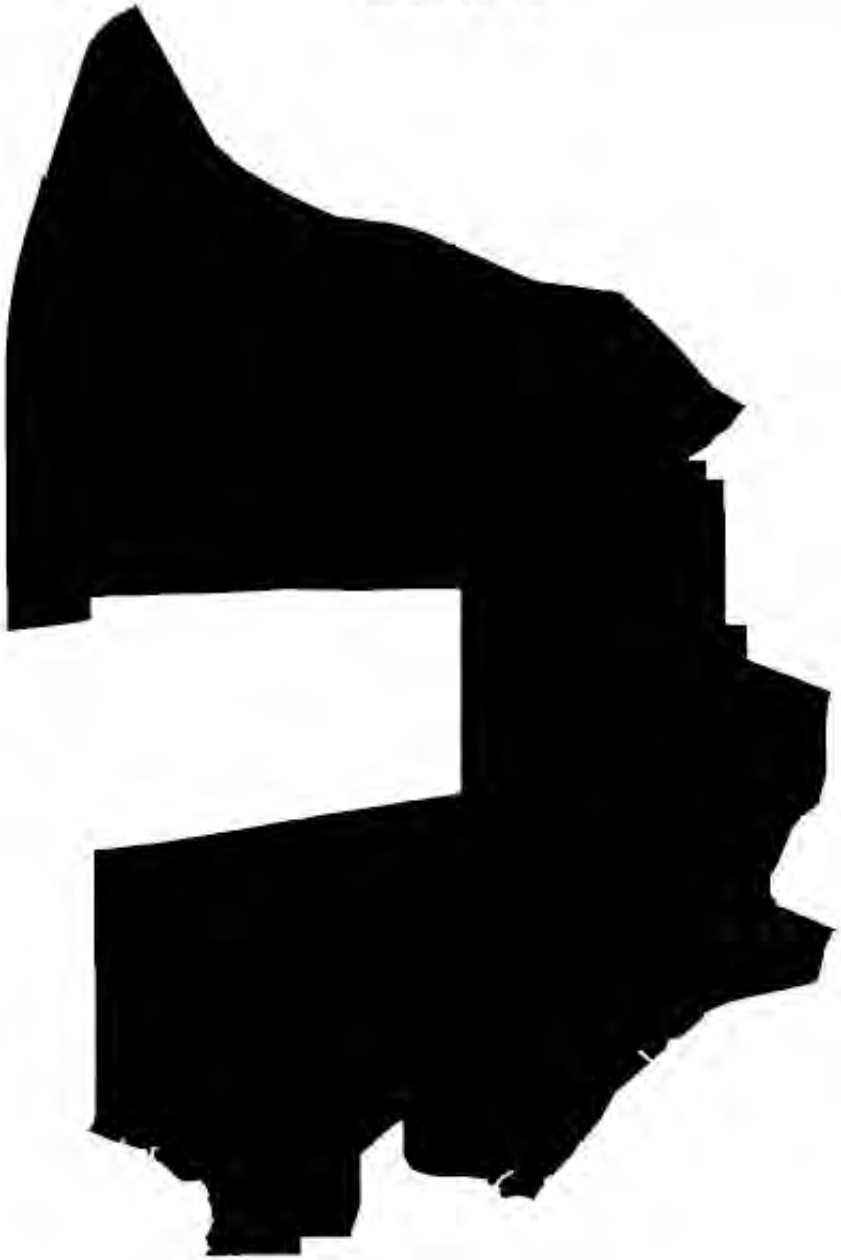
Measures of Compactness

	Adopted 2021	Adopted 2022	P1	P2	P3	Adopted 2021	Adopted 2022	P1	P2	P3	Adopted 2021	Adopted 2022	P1	P2	P3
Measure:	Polsby-Popper	Polsby-Popper	Polsby-Popper	Polsby-Popper	Polsby-Popper	Reock	Reock	Reock	Reock	Reock	Schwartz-berg	Schwartz-berg	Schwartz-berg	Schwartz-berg	Schwartz-berg
Sum	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Min	0.15	0.19	0.2	0.2	0.2	0.19	0.27	0.3	0.32	0.32	1.18	1.18	1.16	1.21	1.18
Max	0.67	0.69	0.72	0.66	0.69	0.57	0.57	0.65	0.55	0.55	2.54	2.17	2.13	2.13	2.13
Mean	0.38	0.43	0.46	0.44	0.45	0.41	0.44	0.44	0.44	0.44	1.67	1.5	1.44	1.48	1.47
Std. Dev.	0.18	0.15	0.14	0.13	0.14	0.13	0.09	0.09	0.08	0.07	0.44	0.28	0.24	0.24	0.25
District															
1	0.53	0.53	0.53	0.53	0.53	0.5	0.5	0.5	0.5	0.5	1.32	1.32	1.32	1.32	1.32
2	0.29	0.27	0.29	0.27	0.27	0.48	0.47	0.46	0.49	0.49	1.58	1.64	1.52	1.65	1.65
3	0.2	0.19	0.2	0.2	0.2	0.31	0.32	0.32	0.32	0.32	2.12	2.17	2.13	2.13	2.13
4	0.5	0.5	0.5	0.5	0.5	0.49	0.49	0.49	0.49	0.49	1.4	1.4	1.4	1.4	1.4
5	0.46	0.46	0.46	0.46	0.46	0.37	0.37	0.37	0.37	0.37	1.47	1.47	1.47	1.47	1.47
6	0.5	0.5	0.5	0.5	0.5	0.45	0.45	0.45	0.45	0.45	1.23	1.23	1.23	1.23	1.23
7	0.18	0.41	0.39	0.32	0.33	0.3	0.39	0.42	0.36	0.39	1.95	1.49	1.58	1.73	1.72
8	0.31	0.31	0.33	0.33	0.33	0.49	0.54	0.53	0.55	0.55	1.76	1.44	1.34	1.39	1.4
9	0.15	0.31	0.39	0.42	0.4	0.19	0.27	0.3	0.36	0.4	2.54	1.78	1.59	1.53	1.57
10	0.19	0.34	0.5	0.41	0.48	0.2	0.39	0.4	0.37	0.44	2.2	1.7	1.35	1.52	1.41
11	0.67	0.63	0.66	0.66	0.66	0.51	0.49	0.49	0.49	0.49	1.21	1.24	1.21	1.21	1.21
12	0.56	0.69	0.51	0.64	0.69	0.55	0.5	0.46	0.53	0.5	1.29	1.18	1.35	1.22	1.18
13	0.59	0.59	0.44	0.44	0.44	0.57	0.57	0.35	0.35	0.35	1.18	1.18	1.46	1.46	1.46
14	0.22	0.33	0.72	0.5	0.51	0.32	0.39	0.65	0.47	0.36	2.08	1.71	1.16	1.39	1.38
	The measure is always between 0 and 1, with 1 being the most compact.					The measure is always between 0 and 1, with 1 being the most compact.					This measure is usually greater than or equal to 1, with 1 being the most compact.				

EXHIBIT 10

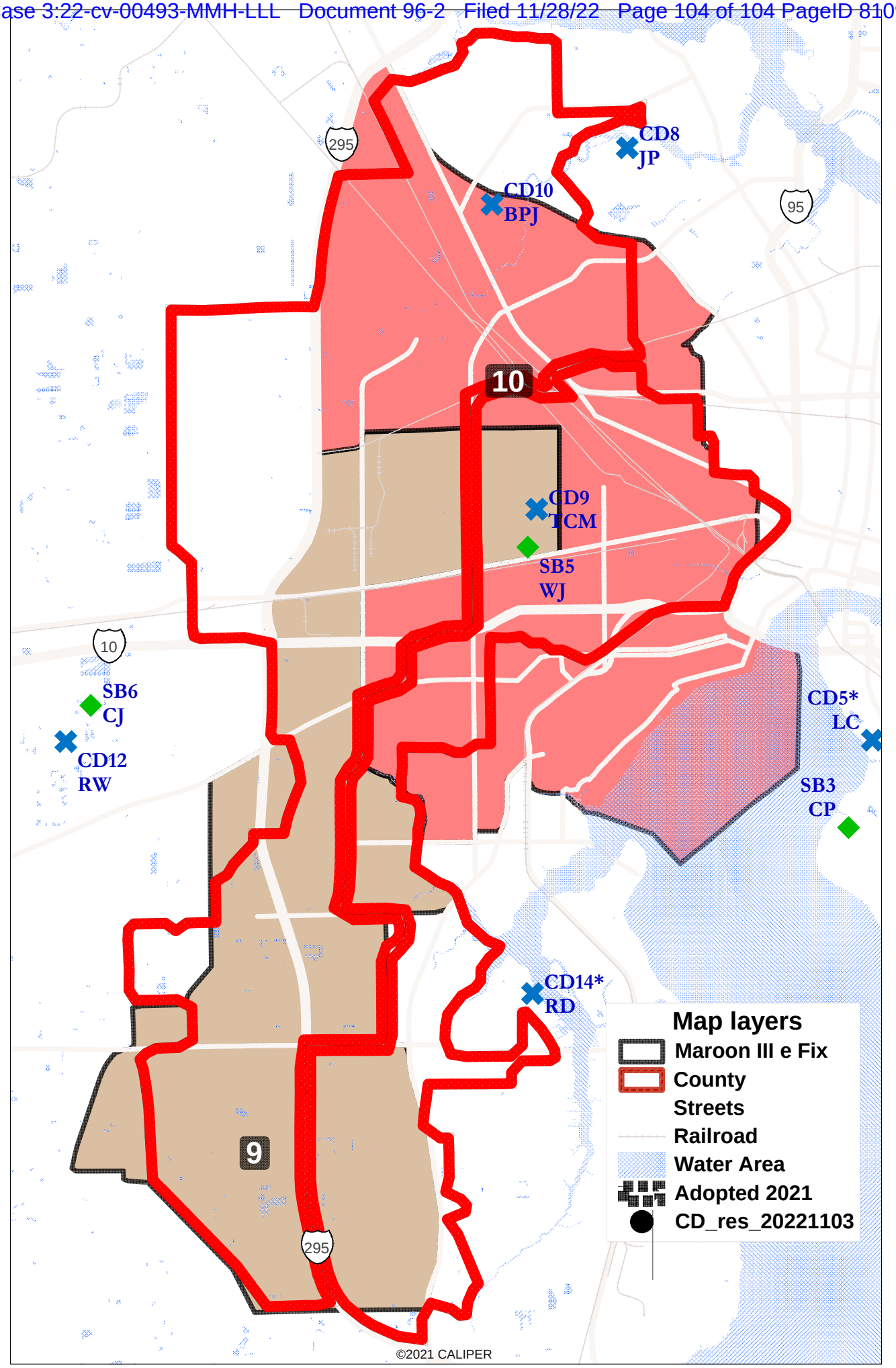
Enjoined Plan
District 10

2022-800 Plan
District 10



Jacksonville, FL
Enjoined Plan
District 9

Jacksonville, FL
2022-800 Plan
District 9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Railroad
Water Area
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