

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

JACKSONVILLE BRANCH  
OF THE NAACP, *et al.*,

*Plaintiffs,*

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

v.

CITY OF JACKSONVILLE, *et al.*,

*Defendants.*

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**MOTION TO ORDER SPECIAL ELECTIONS FOR  
DUVAL COUNTY SCHOOL BOARD DISTRICTS 4 AND 6**

Pursuant to the Parties' settlement agreement as entered by the Court, ECF 132, Plaintiffs respectfully move the Court to exercise its equitable power and discretion to order special elections in Duval County School Board Districts 4 and 6, to coincide with the regularly scheduled elections for School Board Districts 1, 3, 5, and 7.

**INTRODUCTION**

"[I]ndividuals . . . whose constitutional rights have been injured by improper racial gerrymandering have suffered significant harm. Those citizens are entitled to vote as soon as possible for their representatives under a constitutional apportionment plan." *Harris v. McCrory*, 159 F. Supp. 3d 600, 627 (M.D.N.C. 2016) (internal punctuation and citations omitted), *aff'd sub nom. Cooper v. Harris*, 137 S. Ct. 1455 (2017); *accord Page v. Va. State Bd. of Elections*, No. 3:13-cv-678, 2015 WL 3604029, at \*18 (E.D. Va. June 5, 2015); *Smith v. Beasley*, 946 F. Supp. 1174, 1212 (D.S.C. 1996);

*Cosner v. Dalton*, 522 F. Supp. 350, 364 (E.D. Va. 1981).

In some cases, countervailing considerations outweigh this urgent principle. This is not one of those cases. Here, the Court can enfranchise Jacksonville residents who have suffered decades of race-based districting *without* significantly disrupting the ordinary processes of governance or improperly intruding on state sovereignty. Under such circumstances, the Court should exercise its equitable power to order special elections for Duval County School Board Districts 4 and 6. *See* ECF 53 at 136 (notwithstanding “reluctance” to intrude, “failing to act would be a[] . . . serious failure of the responsibility of the judicial branch”); *see also United States v. Osceola Cnty.*, 474 F. Supp. 2d 1254, 1255 (M.D. Fla. 2006) (ordering special elections to remedy Voting Rights Act violation).

## **BACKGROUND**

### **A. Procedural Background**

In March 2022, Jacksonville’s City Council enacted a redistricting plan that largely maintained existing lines for City Council and School Board districts. Many of those districts, like their predecessors, were unnecessarily race-based in violation of the Fourteenth Amendment. Plaintiffs challenged those lines, seeking injunctive relief. Among their requests, Plaintiffs anticipated the need for special elections to ensure Jacksonville’s citizens could “have their rights vindicated as soon as possible so that they c[ould] vote for their representatives under a constitutional [ ] plan.” *Wright v. Sumter Cnty. Bd. of Elections & Registration*, 361 F. Supp. 3d 1296, 1305 (M.D. Ga. 2018), *aff’d*, 979 F.3d 1282 (11th Cir. 2020); *see* ECF 1 at 65 (prayer for relief).

In October 2022, this Court found that it was substantially likely that Plaintiffs would prevail on the merits of their racial gerrymandering claim—namely, that race predominated as the City Council packed Black residents into Council Districts 7, 8, 9, and 10, and School Board Districts 4 and 5, stripping them from Council Districts 2, 12, and 14, and School Board District 6. ECF 53; ECF 1. Recognizing the irreparable and severe harm Plaintiffs faced, the Court preliminarily enjoined Defendants from holding elections under the Council-passed redistricting plan and set forth a process for establishing an interim remedy to govern elections pending final judgment. ECF 53. The Council proposed an interim remedy that perpetuated the underlying constitutional violation, and this Court sustained Plaintiffs’ objections to that proposal. ECF 101. The Court adopted a Plaintiff-submitted proposal (“P3”) as the interim remedy pending final judgment. *Id.* Subsequently, the Parties entered into a settlement agreement ratified by the City Council and submitted the agreement for the Court’s approval. ECF 128, 128-2. Pursuant to the agreement, the Parties requested that the Court enter final judgment adopting P3 as a permanent remedy until the 2030 Census. ECF 132-1 ¶ 3. The Parties also requested that the Court retain jurisdiction to enforce the agreement and to adjudicate the present motion—Plaintiffs’ request for the Court to order special elections in School Board Districts 4 and 6, to coincide with the next regularly scheduled elections for School Board Districts 1, 3, 5, and 7. *Id.* ¶ 8.

### **B. Duval County School Board**

There are seven Duval County School Board districts. Each School Board

district encompasses two City Council districts. School Board elections are held on a staggered schedule for four-year terms. Odd-numbered seats (Districts 1, 3, 5, and 7) are elected in presidential election years; even-numbered seats (Districts 2, 4, and 6) are elected in gubernatorial election years.<sup>1</sup> So, the odd-numbered seats were last on the ballot in 2020 and will be next up in 2024. The even-numbered seats, meanwhile, were last on the ballot in 2022 and are next scheduled for 2026.

Each of the current School Board incumbents was elected under the district lines established in 2011. Because the 2022 elections occurred within nine months of the City Council's post-2020 Census redistricting legislation, they were held under the old lines. *See* Charter § 13.03. The 2024 elections for the odd-numbered seats will be held using the P3 districts established in the instant litigation. Finally, in the absence of this Court's intervention, elections for the even-numbered seats will be held using P3 in 2026.

Importantly, the districts the Court enjoined were “substantially the same” as the 2011 lines from which the current School Board incumbents were elected. ECF 53 at 88. In fact, it was “undisputed[] that the lines drawn in 2011 were reenacted in 2022 with only minor changes to the Challenged Districts.” *Id.* at 103. As a result, the circumstantial evidence that the Court considered in enjoining the 2022 Plan applied in equal force to the 2011 Plan. *See, e.g., id.* at 88–89 (“[T]he Imai Report would seem to confirm what the uncontested historical evidence shows—that race predominated

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<sup>1</sup> The primary election coincides with the statewide August primary, and the runoff election, if necessary, coincides with the state general election in November.

the 2011 design of the Challenged Districts.”); *see also* ECF 34-18, Appendix A (Austin Report showing 2011 racial data by district). The direct evidence, meanwhile, led the Court to conclude “what occurred in 2011, which the City has not disputed, unabashedly points to racial gerrymandering.” ECF 53 at 102. “Councilmembers representing the majority-minority districts were very focused on maintaining high BVAP percentages in those districts and ensuring that ‘what’s existing is not diluted,’” *id.* (citation omitted), including at one point instructing their redistricting consultants “to go identify ‘where all the precincts are that have 60 percent minorities,’” *id.* at 25 (citation omitted). The Court concluded “that the 2011 evidence, which [was] . . . uncontradicted by the City, show[ed] that in 2011 race was the factor that could not be compromised, at least with respect to the drawing of Districts 7, 8, 9, and 10.” *Id.* at 102–103; *see also id.* at 23–28 (recounting direct evidence).

As it currently stands, School Board District 4 consists of Council Districts 7 and 8, two of the previously packed Council districts. As the Court explained in its previous orders, Council Districts 7 and 8 traversed the city and split communities to capture as many Black residents as possible. District 7 “jump[ed] the Trout River, in order to connect a slice of Jacksonville’s northside to the downtown,” while “District 8, the bulk of which encompasses the rural northwest side of Jacksonville, forego[ed] compactness to incorporate an appendage reaching deep into downtown.” *Id.* at 95. In fact, Districts 7 and 8 were the two most packed districts of all; District 8 approached 70% Black population, a percentage its incumbent did not want to see reduced. *Id.* at 42–43.

School Board District 4, meanwhile, consists of Council Districts 12 and 14. These districts were stripped of Black residents, making them artificially white. Each bordered District 9 or 10 as those districts snaked from downtown Jacksonville nearly to the Clay County border; in each case, “every single precinct on the District 7–10 side of the line has a higher BVAP percentage than the corresponding precinct on the District [ ] 12, or 14 side of the line. Not *some* precincts along the line, not *many* precincts along the line, but *every single one*.” ECF 53 at 96. District 14’s border was perhaps the most brazen, featuring “the strange hook protruding from District 9 into District 14,” which “extend[ed] to surround Black adults in the area, while leaving White adults in District 14.” *Id.* at 78.<sup>2</sup>

### LEGAL STANDARD

“Relief in redistricting cases is ‘fashioned in the light of well-known principles of equity.’” *North Carolina v. Covington* (“*Covington I*”), 581 U.S. 486, 488 (2017) (quoting *Reynolds v. Sims*, 377 U.S. 533, 585 (1964)). These principles require a court to account for “what is necessary, what is fair, and what is workable,” *id.* (quoting *New York v. Cathedral Academy*, 434 U.S. 125, 129 (1977)), through a “careful case-specific analysis,” *id.* at 489. When a plaintiff in a racial gerrymandering lawsuit seeks special elections, a court must weigh, among other factors, “[1] the severity and nature of the particular constitutional violation, [2] the extent of the likely disruption to the ordinary processes of governance if early elections are imposed, and [3] the need to act with

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<sup>2</sup> School Board District 2 consists of Council Districts 3 and 13, which Plaintiffs did not challenge.

proper judicial restraint when intruding on state sovereignty.” *Id.* at 488.

## ARGUMENT

### A. Plaintiffs Are Suffering a Severe Constitutional Violation

Plaintiffs are suffering immense constitutional harm. “Classifications of citizens on the basis of race ‘are by their very nature odious to a free people whose institutions are founded upon the doctrine of equality.’” *Shaw v. Reno*, 509 U.S. 630, 643 (1993) (quoting *Hirabayashi v. United States*, 320 U.S. 81, 100 (1943)). This Court has described the harm Plaintiffs suffer as “grievous,” ECF 53 at 134, and “egregious,” ECF 62 at 14. The Eleventh Circuit described it as “immense.” *Jacksonville Branch of NAACP v. City of Jacksonville*, No. 22-13544, 2022 WL 16754389, at \*5 (11th Cir. Nov. 7, 2022). As this Court explained, Jacksonville’s districting scheme “confines the voice of Black voters” to a handful of districts, preventing them from “hav[ing] a meaningful impact on any election or a meaningful voice on any issue of concern” in neighboring districts. ECF 53 at 122–123. The current School Board map “divid[es] communities to prioritize race in the drawing of district lines” thus “undermin[ing] the quality of representation for the people living in those communities and districts.” *Id.* at 123.

The harm is not limited to individual Plaintiffs or other voters, which is important because in determining equitable relief, the Court must engage in a “balancing of the individual *and collective* interests’ at stake.” *Covington I*, 581 U.S. at 488 (quoting *Swann v. Charlotte–Mecklenburg Bd. of Ed.*, 402 U.S. 1, 16 (1971) (emphasis added)). Beyond the harm to voters, the “elected representatives” of racially gerrymandered districts receive a “pernicious” message that will make them “more

likely to believe that their primary obligation is to represent only the members of [one racial] group.” *Shaw*, 509 U.S. at 648. These serious harms are “altogether antithetical to our system of representative democracy.” *Id.* Indeed, “[r]acial gerrymandering strikes at the heart of our democratic process, undermining the electorate’s confidence in its government as representative of a cohesive body politic in which all citizens are equal before the law.” *Ala. Legis. Black Caucus v. Alabama*, 575 U.S. 254, 283 (2015) (Scalia, J., dissenting).

The scope and duration of this grievous harm also underscore its severity. In evaluating the severity of the constitutional violations at issue, courts have weighed the geographic scope of the violation, the number of individuals harmed, and the duration of the harm. *See, e.g., Covington v. North Carolina* (“*Covington II*”), 270 F. Supp. 3d 881, 892 (M.D.N.C. 2017); *Sumter Cnty.*, 361 F. Supp. 3d at 1305; *League of Women Voters of Mich. v. Benson*, 373 F. Supp. 3d 867, 959 (E.D. Mich.), *vacated sub nom. Chatfield v. League of Women Voters of Mich.*, 140 S. Ct. 429 (2019).<sup>3</sup>

Here, the scope is broad: this Court held that seven of Jacksonville’s fourteen City Council districts and three of its seven School Board districts were racially gerrymandered. Those districts include just under half of the City’s population. *See* ECF 53-1 (map containing demographic data). Perhaps more importantly, in this context, they include a supermajority—72.6%—of Jacksonville’s Black residents. *See*

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<sup>3</sup> *Benson* involved a Fourteenth Amendment challenge to alleged partisan gerrymandering. The decision was vacated following the Supreme Court’s decision in *Rucho v. Common Cause*, 139 S. Ct. 2484 (2019), that partisan gerrymandering does not present a justiciable claim, but the court’s analysis of special elections can be instructive here.

*id.* The scope of the violation is substantial by any measure. In *Covington*, for example, the district court found that 28 of the state’s 120 state legislative districts had been racially gerrymandered. *See Covington I*, 581 U.S. at 486–87 (28 racially gerrymandered districts); N.C. CONST. art. II, § 4 (120 total districts). On remand from the Supreme Court, the district court concluded that the “broad geographic scope” of the violation and the number of people affected cut in favor of calling special elections. *Covington II*, 270 F. Supp. 3d at 892–93. Similarly, the court in *Benson* held that special elections were warranted for ten state senate seats due to the breadth of the constitutional violation. *Benson*, 373 F. Supp. 3d at 953–60. In that case, plaintiffs challenged 34 districts of the U.S. House, state senate, and state house *combined*, out of a total of 162 seats. *Id.* at 880, 959; *see also* MICH. CONST. art. IV, §§ 2–3 (38 state senate districts and 110 state house districts); U.S. Dep’t of Commerce, U.S. Census Bureau, *Table 1: Apportionment Population and Number of Representatives by State: 2010 Census*<sup>4</sup> (14 U.S. House districts). The geographic and population scope of Jacksonville’s racial gerrymander is comparatively high.

The duration of Jacksonville’s violation is nothing short of stunning. This Court has noted the City’s “decades-long history of racial gerrymandering.” ECF 101 at 5, 38. The Court has explained that evidence of “what occurred in 2011, which the City has not disputed, unabashedly points to racial gerrymandering.” ECF 53 at 102. Defendants’ own position in this litigation has been that any harm from racial

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<sup>4</sup> Available at <https://www2.census.gov/programs-surveys/decennial/2010/data/apportionment/apport2010-table1.pdf>.

gerrymandering has existed since 1991. *See, e.g.*, ECF 41 at 29–30; ECF 57 at 6–7; ECF 40-34 at 16 (Defendants’ expert explaining the 2022 redistricting structure “confirmed” the 1991, 2001, and 2011 processes). In *Covington*, the court on remand found it significant that the “harms ha[d] persisted for over six years, tainting three separate election cycles.” *Covington II*, 270 F. Supp. 3d at 894. The violations here lasted even longer, regardless of whether 1991 or 2011 is the appropriate starting point by which to measure Jacksonville’s racial gerrymander.

*Navajo Nation v. San Juan County* is instructive here. No. 2:12-cv-39, 2017 WL 6547635, (D. Utah Dec. 21, 2017), *aff’d*, 929 F.3d 1270 (10th Cir. 2019). There, the court found that race was the predominant factor in choosing to maintain the lines of a majority-minority district “for decades.” *Id.* at \*18–19 & n.150. Under those circumstances, the court found it clear that the violations were “severe and longstanding” enough to warrant special elections. *Id.* at \*18–19. Importantly, this holding was unaffected by the fact that the districts had not been challenged in the past—the court did not ignore the reality of what had occurred in prior decades. *See id.* at \*18 & n.150. Likewise, in assessing the severity of Jacksonville’s gerrymander, this Court need not ignore the history it has already noted. That history is necessarily part of the “careful case-specific analysis” in which the Court must engage. *Covington I*, 581 U.S. at 489.

**B. Granting Plaintiffs’ Request Would Not Significantly Disrupt Governance**

The second *Covington* factor also militates in favor of granting Plaintiffs’ request,

because ordering special elections here would not significantly disrupt the ordinary processes of governance. *See id.* at 488. Of course, any order requiring special elections definitionally disrupts ordinary processes, but the factors courts have considered to determine whether that disruption is *significant* cut in favor of granting Plaintiffs' motion, as do several other case-specific factors.

*First*, Plaintiffs ask for special elections for Districts 4 and 6 to coincide with the elections already scheduled for Districts 1, 3, 5, and 7. Plaintiffs don't ask this Court to set a new election day. Their request is relatively modest: order that six, rather than four, School Board seats appear on the August and (if necessary) November 2024 ballots. Other courts have observed that this kind of order is not particularly disruptive. *See Navajo Nation*, 2017 WL 6547635, at \*18 ("The special elections will proceed under the regularly scheduled 2018 election deadlines and processes, thus minimizing their impact."); *Benson*, 373 F. Supp. 3d at 959 ("Because the special Senate election would occur on a regular election day and at a regularly-scheduled interval, it would not result in any additional election being held during the calendar year."). The majority of School Board seats will already be on the ballot. The August primary election will coincide with the statewide primary for federal and state offices and any runoff will coincide with the November general election, meaning the Supervisor of Elections will already be conducting a countywide election and most voters will be at the polls anyway. Adding two additional School Board races carries little "risk of generating voter confusion [or] low voter turnout" under these circumstances. *Sumter Cnty.*, 361 F. Supp. 3d at 1305.

*Second*, Plaintiffs’ request seeks special elections in late August 2024—fourteen months from now. Other courts have considered the timeframe when assessing whether to order special elections. In *Benson*, for example, the court found it relevant that the requested special elections would not occur for eighteen months.<sup>5</sup> *Benson*, 373 F. Supp. 3d at 960. By contrast, on remand in *Covington*, the court declined to order special elections in part because of “overlapping and compressed election cycles,” with “only a few months” lead time. *Covington II*, 270 F. Supp. 3d at 884, 900. The facts here are more similar to those in *Benson* than to those in *Covington*—there is no basis to conclude that the timeline here would be significantly intrusive.<sup>6</sup>

*Third*, the City Council has had ample opportunity to set new lines and has chosen to settle with Plaintiffs to adopt P3. Courts weighing the second *Covington* factor have considered whether the legislature has had appropriate time to craft new districts. Where the legislature has had a substantial amount of time to pass new lines, courts have viewed it as less disruptive to call special elections under those lines. *See Benson*, 373 F. Supp. 3d at 960; *Sumter Cnty.*, 361 F. Supp. 3d at 1305 (special election could be appropriate “after giving the legislature time to enact a new districting plan”).

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<sup>5</sup> At the time the *Benson* court concluded an eighteen-month timeframe counseled in favor of special elections, the legislature had not yet proposed a remedy. *Benson*, 373 F. Supp. 3d at 960. Here, a remedy already exists, so planning for special elections could begin immediately. *See generally* ECF 132.

<sup>6</sup> And unlike when the Court ordered P3 as the interim remedy for the 2023 City Council elections, here, no waivers of candidate residency requirements are needed to ease burdens on School Board candidates. Besides the year’s notice candidates would have to prepare for the election, the Legislature eliminated all durational residency requirements for School Board candidates during the 2023 legislative session. Fla. Laws ch. 2023-101, § 4, at 2 (providing that school board candidates must reside in their district only by the date they assume office).

This Court is undoubtedly aware of how the Council came to adopt P3. In “only four meetings, over a total of only five and a half hours,” ECF 62 at 12, the Council was able to pass a proposed interim remedy following the Court’s injunction. Of course, the Court sustained Plaintiffs’ objections to the proposed remedy, ECF 101, but that reflects the Council’s impermissible choices, not any lack of opportunity to make permissible ones.<sup>7</sup>

The Council then chose to adopt P3 as part of a comprehensive settlement agreement. *See* ECF 128, 132. P3 was the Council’s final choice, arrived at after negotiations with Plaintiffs, two committee hearings, and a final Council vote.<sup>8</sup> That means ordering special elections under those lines would not be significantly disruptive to the ordinary processes of government. To hold otherwise would effectively punish Plaintiffs for *Defendants’* failures in their interim remedial process—a bizarre result that would disincentivize future settlements.

*Finally*, Florida election administrators and voters are well-acquainted with truncated terms following redistricting. In the first election following each decennial redistricting, the entire Florida Senate is on the ballot to account for shifted district lines, with some senators elected to two-year terms instead of the ordinary four-year

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<sup>7</sup> In fact, until settlement negotiations progressed, the Council appeared ready to “Confirm [Its] Intent to Permanently Adopt the Maroon III E Fix Map for Use in Duval County Until the Next Decennial Census in 2030.” Jacksonville Ord. 2023-0090-W, available at <https://jaxcityc.legistar.com/LegislationDetail.aspx?ID=6020976&GUID=8AB99C63-7E56-4706-B26A-ED73B0A38FC9>.

<sup>8</sup> Jacksonville Ord. 2023-281-E, available at <https://jaxcityc.legistar.com/LegislationDetail.aspx?ID=6176286&GUID=ADCFFFAC-9356-4AA3-8BDC-8B57120596DD>.

terms. FLA. CONST. art. III, § 15(a); *In re SJR 1176*, 83 So. 3d 597, 658 (Fla. 2012). After litigation forced changes to the Senate map in 2015, the entire Senate stood for election in 2016.<sup>9</sup> The same thing occurred in the 1960s. *Swann v. Adams*, 263 F. Supp. 225, 227–28 (S.D. Fla. 1967) (truncating terms of all 165 state legislators and ordering special elections to be held in March 1967 to remedy equal protection violations). Moreover, the Legislature recently required certain county commission terms be truncated following redistricting. Fla. Stat. § 124.011(2)(a).

This makes good sense. The combination of redistricting and staggered terms can disenfranchise many voters. That’s what has happened in Jacksonville. Voters who live in odd-numbered districts last voted in 2020; in the ordinary course, they should next vote four years later, in 2024. But if a voter was moved from an odd-numbered district to an even-numbered district, they will not be able to vote for six years. Consider a voter moved from District 5 in the 2011 Plan to District 6 in P3. She last voted for School Board in 2020, when odd-numbered seats were up for election; she could not vote in 2022, when even-numbered seats were up; but she was moved into an even-numbered seat after that, meaning she can’t vote in 2024. She will go six years without casting a ballot for Duval County School Board.<sup>10</sup> 72,306 residents have

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<sup>9</sup> Brandon Larrabee, *New Senate Numbers Set Off Election-year Scramble*, NEWS4JAX (Jan. 5, 2016), <https://www.news4jax.com/news/2016/01/06/new-senate-numbers-set-off-election-year-scramble>.

<sup>10</sup> A voter moved from District 6 to District 5, meanwhile, will be able to vote twice in two years: for the even-numbered seat in 2022, and for the odd-numbered seat in 2024. This confuses representation and accountability: without a special election, for two years there will be two incumbents for whom she may have voted and whom she might view as her representative. Plaintiff Dennis Barnum was moved from District 6 to District 5. Ex. 1 (Supp. Fairfax Rep.) ¶ 20. Ayesha Franklin is similarly situated, as she was moved from District 4 to District 5. *Id.*

been affected in this way: 35,886 people were shifted from the 2011 Plan’s District 5 into P3’s District 6;<sup>11</sup> 27,605 were shifted from District 5 into District 4;<sup>12</sup> and 8,815 were shifted from District 1 into District 4. Ex. 1 (Supp. Fairfax Rep.) ¶ 18.

Florida’s practice of truncating terms has been lauded as a model for states to follow to avoid one-person, one-vote concerns. *See* Margaret B. Weston, Comment, *One Person, No Vote: Staggered Elections, Redistricting, and Disenfranchisement*, 121 YALE L.J. 2013, 2018–25 (2012). Several other states have similar systems. *Id.* at 2018–19. Here, Florida’s statewide practice reflects two important points for the Court to consider. First, the fact that Florida law requires truncated post-redistricting terms for the state legislature and county commissions demonstrates a strong statewide policy on how to handle post-redistricting elections; granting Plaintiffs’ request against this backdrop would be significantly less intrusive to governance. *See In re Apportionment Law, SJR 1E*, 414 So. 2d 1040, 1049 (Fla. 1982) (The truncation requirement “was intended as a means to implement a fair reapportionment plan at the earliest possible date.”). Second, because Jacksonville’s voters are already used to voting for truncated State Senate terms after redistricting, there is less chance of confusion; that, too, makes Plaintiffs’ requested relief less intrusive.<sup>13</sup>

In fact, granting Plaintiffs’ requested relief would *reduce* confusion and be particularly appropriate here because of the scope of the changes between the 2011

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<sup>11</sup> This includes Plaintiff Sheila Singleton. Supp. Fairfax Rep. ¶ 20.

<sup>12</sup> This includes Plaintiffs Eunice Barnum and Janine Williams. Supp. Fairfax Rep. ¶ 20.

<sup>13</sup> The fact that all City Council seats are up at the same time, too, cuts in favor of granting relief. Jaxsons are accustomed to voting for all members of their local legislative body at once.

Plan and P3. Other courts have recognized that, when a lawsuit prompts significant changes in district lines, special elections are appropriate. In *Navajo Nation*, for example, the district court accepted its special master’s recommendation to order “elections in all districts because the boundaries of the present districts and recommended districts overlap.” *Navajo Nation*, 2017 WL 6547635, at \*18. Otherwise, “if an election was not held in all districts it would create confusion as to which representative represented which voters.” *Id.* (internal marks omitted). That confusion is a real concern here.<sup>14</sup> Under the new district lines, 36,420 people in District 4 have never had the chance to vote for or against their School Board representative—that’s 27% of the District’s population. Supp. Fairfax Rep. ¶ 18. District 6 is even worse: 42,698 people—or 30% of the population—are currently represented by an incumbent they have not been able to vote for or against. *Id.* It would be appropriate to grant Plaintiffs’ request regardless of the political climate, but it bears noting that School Board elections and policy have been heavily racialized in recent years<sup>15</sup>—making it particularly galling to leave in place School Board districts that “confine[] the voice of

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<sup>14</sup> School Board District 2, for which Plaintiffs do not seek a special election, is far less susceptible to this confusion. It is comprised of Council Districts 3 and 13, which Plaintiffs did not challenge. There was little change from the 2011 Plan because the Council sought to minimize changes from that Plan, and P3 did not alter districts south and east of the St. Johns River (beyond minor changes the Council itself sought, ECF 101 at 23 & n.12). Supp. Fairfax Rep. ¶ 18.

<sup>15</sup> See, e.g., Steve Patterson, *As Duval School Board Meets Over Bad Teachers, Is Superintendent Diana Greene’s Job Safe?*, FLA. TIMES-UNION (Apr. 25, 2023), <https://www.jacksonville.com/story/news/education/2023/04/25/70146533007>; Ryan Foley, *Anti-CRT Candidates Flip School Board Majorities in 5 Florida Counties*, CHRISTIAN POST (Aug. 24, 2022), <https://www.christianpost.com/news/anti-crt-candidates-flip-school-board-majorities-across-florida.html>; Emily Bloch, *Florida Board of Education Approves New Academic Standards Opposing Critical Race Theory*, FLA. TIMES-UNION (updated June 14, 2021), <https://www.jacksonville.com/story/news/education/2021/06/10/7621918002/>.

Black voters” and prevent them from “hav[ing] a meaningful impact on any election or a meaningful voice on any issue of concern” in neighboring districts. ECF 53 at 122–23.

**C. Granting Plaintiffs’ Request Would Not Unduly Intrude on State Sovereignty**

An order granting special elections is entirely consistent with judicial restraint. Importantly, sovereignty is evaluated from the standpoint of the *electorate*—not the elected officials sitting in unconstitutionally drawn districts. *See Benson*, 373 F. Supp. 3d at 958 (“[B]ecause sovereignty is vested in the people, by preventing the people . . . from fairly and effectively exercising their franchise, the [challenged plan] infringes on state sovereignty, further exacerbating its constitutional harm.” (citation omitted)); *Covington II*, 270 F. Supp. 3d at 897 (“By unjustifiably relying on race to distort dozens of legislative district lines, and thereby potentially distort the outcome of elections and the composition and responsiveness of the legislature, the districting plans interfered with the very mechanism by which the people confer their sovereignty on the General Assembly.”). Here, Defendants cannot invoke sovereignty to deprive voters of the right to choose their elected officials; to the contrary, sovereignty provides a *reason* for special elections.

Any inconvenience of a new election to legislators is no reason to let serious constitutional harm persist, especially when it deprives voters of their right to representation. A special election is necessary to remedy the widespread and serious constitutional harm arising from the City’s racial gerrymander—as such, the principle

of judicial restraint does not militate against intervention here. In *Navajo Nation*, the court found *Covington*'s judicial restraint factor was satisfied where special elections were “specifically aimed at remedying constitutional violations that have affected . . . voters for decades.” *Navajo Nation*, 2017 WL 6547635, at \*19. As discussed above, the racial gerrymander in this case is similarly severe not just in duration, but also in scope and number of voters affected. Accordingly, the City's actions not only permit but also *necessitate* court intervention. *Cf.* ECF 53 at 136.

Finally, to the extent there are burdens on the City of Jacksonville, they do not rise to the level of undue intrusions on sovereignty. As noted above, the additional costs of holding such elections are, at most, minimal. Even so, any administrative costs are significantly outweighed by the interests of voters in constitutional representation. Proper representation, rather than administrative convenience, is the primary concern not just of courts applying the third *Covington* factor, *see Covington II*, 270 F. Supp. 3d at 895; *Benson*, 373 F. Supp. 3d at 959, but also of Florida law, which has long provided for the truncation of State Senate terms upon redistricting. An order granting special elections does not offend the principles of sovereignty and judicial restraint.

“[I]n cases involving unconstitutional . . . racial gerrymandering, numerous courts—including the Supreme Court—have concluded that shortening the terms of elected officials and ordering a special election does not unduly intrude on state sovereignty, particularly when the constitutional violation is widespread or serious.” *Covington II*, 270 F. Supp. 3d. at 896 (collecting cases). This case is no different.

Jacksonville's residents have the right to vote in constitutional districts, and that right should be effectuated as quickly as practicable through special elections.

### CONCLUSION

For the foregoing reasons, the Court should grant Plaintiffs' motion and spare the residents of Jacksonville an additional two years of living in racially segregated School Board districts.

### LOCAL RULE 3.01(g) CERTIFICATION

Plaintiffs' counsel conferred with counsel for Defendants by email and phone.

Defendants oppose this motion.

Respectfully submitted this 27th day of June, 2023,

/s/ Daniel J. Hessel

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Expert Report of Anthony E. Fairfax  
on the  
Core Retention Tables for Duval County, FL  
School Board Districts

June 26th, 2023

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## **I. Introduction**

1. I have been retained by counsel to provide two core retention tables for the Duval County, FL School Board. I was also asked to provide a table of the plaintiffs and their respective school board districts where they reside. These tables relate to Duval County's school board redistricting plans, including the previous 2011 and current P3 plans that were enacted.

## **II. Qualifications**

2. I received a Bachelor of Science degree in Electrical Engineering (BSEE) from Virginia Tech in 1982 and a Master of Geospatial Information Science and Technology (MGIST) degree from N.C. State University in 2016.
3. Currently, I am a demographic and mapping consultant and the CEO/Principal Consultant of CensusChannel LLC. As a consultant working on redistricting issues over the last thirty years, I have developed nearly one thousand redistricting plans during the last four redistricting cycles. I have drawn plans for jurisdictions of all sizes, from statewide plans to redistricting plans for small municipalities. In the course of my career, I have also had the opportunity to draw and analyze many plans for jurisdictions within multiple states throughout the country. In addition, during that timeframe, I have provided consulting services for numerous non-profit and public-sector groups centering on redistricting plan development, analysis, and training.
4. Throughout the redistricting cycles, I have provided services and/or training for several notable national and regional organizations including: the American Civil Liberties Union (ACLU), Campaign Legal Center, Congressional Black Caucus Institute (CBC Institute), Louisiana Legislative Black Caucus (LLBC), NAACP, NAACP Legal Defense and Educational Fund,

Power Coalition for Equity and Justice, Southern Coalition for Social Justice (SCSJ), and Southern Echo.

5. Recently, I was hired to develop an illustrative redistricting plan for the *Robinson v. Ardoin* court case. The Illustrative plan included two majority-Black congressional districts as opposed to one that was included in the state legislature's approved plan. The illustrative plan, report, and testimony provided evidence of the first prong in *Thornburg v. Gingles* in proving dilution of Black voting strength in violation of Section 2 of the Voting Rights Act (VRA). The effort included plan development, expert report, rebuttal report, and testimony.
6. In 2021, I was hired to develop an illustrative redistricting plan for the *Arkansas State Conference NAACP v. Arkansas Board of Apportionment* court case. The Illustrative plan included five additional majority-Black House districts as opposed to the Board of Apportionment plan. The plan, report, and testimony provided evidence of the first prong in *Thornburg v. Gingles* in proving the dilution of Black voting strength in violation of Section 2 of the Voting Rights Act (VRA). The overall effort included plan development, expert report, rebuttal report, and testimony.
7. Prior to this round of redistricting, I was hired to develop illustrative redistricting plans, associated expert reports, depositions, and provide testimony in the *Holloway v. City of Virginia Beach* court case. The Illustrative plans included two majority Latino, Black and Asian (LBA) combined coalition districts to provide evidence of the first prong in *Gingles* for the city of Virginia Beach, VA. Ultimately, for the remedial phase, I developed a plan which included a three majority Latino, Black, and Asian district for the city of Virginia Beach, VA.

8. Also, prior to the 2020 redistricting cycle, I was hired to be the Districting Master for the City of Everett, Washington. The task was to assist the city's Redistricting Commission with developing their districting plan. The city moved from a fully seven-member at-large voting system to five single-member districts and two members elected at-large. As Districting Master, I shepherded the commission through the entire plan development process as they successfully developed the city's first districting system.
9. In addition to Arkansas, Louisiana, and Virginia, I have testified and provided depositions as a redistricting expert in North Carolina and Texas. I provided testimony with a focus on demographic and mapping analysis in federal and state court cases. This included: *Covington v. North Carolina* (North Carolina), *NC NAACP v. State of North Carolina* (North Carolina), *Wright v. North Carolina* (North Carolina) *Perez v. Perry* (Texas), and *Perez v. Abbott* (Texas).
10. My redistricting/GIS experience and work as an expert are contained within my attached resume (see Appendix A).

### **III. Software, Data, and Technical Process Utilized**

11. One of the primary applications utilized was Maptitude for Redistricting ("Maptitude") by Caliper Corporation. Maptitude for Redistricting is one of the leading redistricting software applications used by consultants, major non-profit groups, and governmental entities.<sup>1</sup> The software included Census 2020 data ("PL94-171") for the Jacksonville, FL county, employed during the plan's reproduction process.

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<sup>1</sup> See <https://www.caliper.com/mtrnews/clients.htm> for Maptitude for Redistricting's client list.

12. Microsoft Excel (“Excel”) was utilized to create all of the data tables. Population for combined districts (e.g., Districts 2, 4, and 6) were aggregated using Excel formula calculations.

13. Several datasets were utilized during this effort:

- a) The 2020 census data for the total population and racial demographics were obtained from Caliper Corporation’s datasets for Jacksonville, FL.
- b) Counsel provided the geographic boundaries for the 2011 and P3 plans. The plans were provided as Block Equivalency Files (BEQ) in comma-delimited format (.csv).
- c) Counsel provided the *Jacksonville Branch of the NAACP et al. v. City of Jacksonville et al.* plaintiffs’ addresses. These addresses were provided in text format.

#### **IV. Methodology**

14. The Duval County School Board plans were recreated using the Maptitude software. Once plans were recreated, a core retention (“Core Constituencies”) report was generated.

15. The core retention report presents the population that is retained from one plan to another. In this effort, the core retention report district population for the P3 Plan that was originally in the 2011 Plan. The Maptitude reports were exported and then imported into Excel for the creation of the final tables.

16. The 2020 Census’ Not Hispanic White Alone (“NHWh”) <sup>2</sup> was used for the White population, while Any Part Black (“APBlk”) <sup>3</sup> was used for the Black population. <sup>4</sup>

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<sup>2</sup> The Alone category includes only surveyed persons who selected one race (e.g. single race Black or single race White, etc.).

<sup>3</sup> Any Part Black includes all single race Black in addition to mix raced categories that includes Black and other races. Hispanic Black are also included in the population. Therefore, there exists a slight overlap of population between Hispanic and Any Part Black that include Hispanic Black population.

<sup>4</sup> The Other (“Oth”) race category was calculated by subtracted the NHWh plus APBlk from the total population.

17. Maptitude for Redistricting was used to geocode<sup>5</sup> the plaintiffs' addresses. The boundaries of school districts for 2011 and P3 were overlaid on top of the geocode point locations of the plaintiffs. The district containing each plaintiff's address was recorded in the resulting table (See Table 3).

## V. Results - Tabular Products Created

18. Table 1 below includes the population of the 2011 Plan's districts contained with the P3 Plan district. It shows the source of the population of each School Board district in the P3 Plan as broken down by 2011 Plan School Board districts. Data were extracted from Maptitude's Core Constituencies report (See Appendix B).

**Table 1 – Duval County School Board District's Core Retention from 2011 to P3 Plan**

<b>P3 Plan</b>	<b>2011 Plan</b>	<b>Population</b>
District 1	2011 Dist. 1	135,441
	2011 Dist. 3	4,348
	2011 Dist. 4	1,012
District 2	2011 Dist. 2	133,517
	2011 Dist. 3	4,531
	2011 Dist. 7	10,959
District 3	2011 Dist. 2	3,973
	2011 Dist. 3	136,005
	2011 Dist. 7	6,125
District 4	2011 Dist. 1	8,815
	2011 Dist. 4	99,183
	2011 Dist. 5	27,605
District 5	2011 Dist. 4	25,366
	2011 Dist. 5	71,661
	2011 Dist. 6	39,800
District 6	2011 Dist. 4	6,812
	2011 Dist. 5	35,886
	2011 Dist. 6	99,459
District 7	2011 Dist. 7	145,069

Source: U.S. Census Bureau 2020 Census Data; 2011 and P3 School Board District Plans

<sup>5</sup> Geocoding is a process converting street addresses to geographic coordinates or locations. These coordinates or locations can be represented as points on a map.

19. Table 2 below includes the population of the 2011 Plan's districts contained within the P3 Plan district's 2, 4, and 6. Data were extracted from Maptitude's Core Constituencies report (See Appendix B).

**Table 2 – Duval County School Board District's 2-4-6 Core Retention from the 2011 Plan to the P3 Plan**

<b>P3 Plan</b>	<b>2011 Plan</b>	<b>Population</b>	<b>% of District</b>	<b>NHWht</b>	<b>%</b>	<b>APBlk</b>	<b>%</b>	<b>Oth</b>	<b>%</b>
District 2	2011 Dist. 2	133,517	89.60%	94,275	70.61%	12,130	9.08%	27,112	20.31%
	2011 Dist. 2-4-6	133,517	89.60%	94,275	70.61%	12,130	9.08%	27,112	20.31%
	2011 Dist. 1-3-5-7	15,490	10.40%	8,698	56.15%	2,740	17.69%	4,052	26.16%
District 4	2011 Dist. 4	99,183	73.14%	22,381	22.57%	68,547	69.11%	8,255	8.32%
	2011 Dist. 2-4-6	99,183	73.14%	22,381	22.57%	68,547	69.11%	8,255	8.32%
	2011 Dist. 1-3-5-7	36,420	26.86%	6,644	18.24%	27,095	74.40%	2,681	7.36%
District 6	2011 Dist. 6	99,459	69.96%	47,640	47.90%	31,864	32.04%	19,955	20.06%
	2011 Dist. 2-4-6	106,271	74.76%	52,730	49.62%	32,934	30.99%	20,607	19.39%
	2011 Dist. 1-3-5-7	35,886	25.24%	11,573	32.25%	15,999	44.58%	8,314	23.17%

Source: U.S. Census Bureau 2020 Census Data; 2011 and P3 School Board District Plans

20. Table 3 below includes the *Jacksonville Branch of the NAACP et al. v. City of Jacksonville et al.* Plaintiffs' districts contained within the 2011 and P3 Plans.

**Table 3 – Jacksonville Branch of the NAACP et al. v. City of Jacksonville et al. Plaintiffs' Districts within the 2011 and P3 School Board Plans**

<b>Plaintiff</b>	<b>2011 Plan's District</b>	<b>P3 Plan's District</b>
Marcella Washington	1	1
Ingrid Montgomery	4	4
Ayesha Franklin	4	5
Tiffanie Roberts	4	4
Rosemary McCoy	5	5
Sheila Singleton	5	6
Eunice Barnum	5	4
Janine Williams	5	4
Dennis Barnum	6	5

Source: Addresses provided by Plaintiffs' Counsel and then geocoded

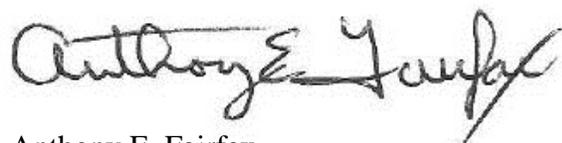
## **VI. Appendices**

21. The following appendices are included with this report:

- Appendix A - Resume of Anthony E. Fairfax
- Appendix B - Core Constituencies Report for Duval County School Board Districts

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the forgoing is true and correct:

Executed, this day, June 26, 2023, in Hampton, Virginia

A handwritten signature in black ink that reads "Anthony E. Fairfax". The signature is written in a cursive style with a large, stylized initial "A".

Anthony E. Fairfax

## **Appendix**

- Resume of Anthony E. Fairfax
- Core Constituencies Report for Duval County, FL's  
2011 and P3 School Board Districts

**Appendix A**  
Resume of Anthony E. Fairfax

## Anthony “Tony” Fairfax

16 Castle Haven Road, Hampton, Virginia 23666

Office Telephone: (757) 838-3881

Email: fairfax@censuschannel.com

### Experience Highlights:

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- Demographic, Geographic & Voter Data Analysis
- Multiple GIS Software/Census Data Skillsets
- Redistricting Plan Development & Analysis
- Redistricting Expert Reports & Testimony
- Redistricting Presentations & Training
- ESRI ArcGIS Map Applications & Dashboards
- Maptitude for Redistricting Proficiency
- Professional Presentations/Training Experience

### Education:

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Master of Geospatial Information Science and Technology (2016)  
North Carolina State University, Raleigh, North Carolina

Graduate Certificate in Geographic Information Systems (2016)  
North Carolina State University, Raleigh, North Carolina

Bachelor of Science Degree in Electrical Engineering (1982)  
Virginia Tech, Blacksburg, Virginia

### Work Experience:

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#### **CensusChannel LLC, Hampton, VA (2009 - Present)**

CEO & Principal Consultant - Providing overall project management and operations as well as primary consulting services for clients. Also responsible for customer acquisition and support. Core tasks include GIS-centered services centering on: redistricting support (extensive use and analysis of traditional redistricting principles); demographic/socioeconomic, geographic, and voting data; GIS, Census Data, and Redistricting training; GIS data processing/conversion; expert redistricting plan development, analysis, depositions, testimony, and training. Major clientele and projects include:

- **Town of Cheverly, MD (2022 – Present)** – Providing advice, consultation, and redistricting plan development services as redistricting consultant to the town. Efforts center on developing new districting plan options for the town.
- **City of Baltimore, MD Office of Council President (2022 - Present)** – Provided advice, consultation, and redistricting plan development services as redistricting consultant to the city’s Office of Council President. Efforts center on the alternative development of districting plans for the city.
- **My Brother’s Keeper Alliance, Chicago, IL (2022)** – Providing demographic and socioeconomic analysis of select neighborhood communities.
- **The ACLU, New York, NY (2021 – Present)** – Providing expert plan development services centering on the states of Alabama, Arkansas, and California.
- **The Power Coalition for Equity and Justice, New Orleans, LA (2021 - 2022)** - Providing technical advice and input for building an equitable redistricting process in Louisiana for communities, legislators, and organizations. Providing analysis and plan alternatives for Louisiana state legislative House and Senate districts where Black voters could elect a candidate of choice.

- **Crescent City Media Group, New Orleans, LA (2021)** – Provided redistricting training to the PreRedistricting Lab. Training centered on various educational presentations and hands-on sessions for community leaders and local/state legislators.
- **Bondurant, Mixson & Elmore LLP, Atlanta, GA (2021)** – Provided statewide redistricting plan development for Georgia congressional districts. Tasks included being part of a three-member map-drawing team that developed the proposed plan for the Georgia House and Senate Democratic caucus.
- **NAACP Legal Defense Fund (LDF), New York, NY (2020 – 2022)** - Provided redistricting development and analysis of various district configurations for city, county, and state-level plans.
- **Crowd Academy [an SCSJ sponsored effort], Durham, NC (2020 - 2021)** - Provided redistricting training and support. Training centered on presentations on “How the Lines are Drawn” which focuses on pre-plan development and plan development activities of redistricting. The target attendee included individuals in Georgia, North Carolina, South Carolina, Tennessee, and Texas. The effort also includes providing mentorship to Academy Fellows and Academy Mentors.
- **City of Everett, WA, Everett, WA (2020)** – Provided advice, consultation, and mapping services as Districting Master to the city of Everett, WA’s Districting Commission. Efforts centered on the development of the city’s first districting plan. Also assisted with answering questions at public forums and developed an ArcGIS web map application for public access to all plans.
- **NAACP, Baltimore, MD (2018 - Present)** – Providing GIS consulting services via the NAACP (as fiscal agent) to the *Racial Equity Anchor Collaborative* (consisting of the Advancement Project, APIA Health Forum, Demos, Faith in Action, NAACP, National Urban League, NCAI, Race Forward, and Unidos U.S.). Efforts include the development of the Racial Equity 2020 Census Data Hub. The Data Hub utilized ESRI’s Hub Cloud platform, that centralized web maps, mapping applications, and dashboards into a common platform that enabled collaborative partners to locate hard-to-count areas by major race or ethnicity.
- **Southern Echo, Jackson, MS (2018 - Present)** – Providing Map related educational products pertaining to the state of Mississippi. Also provided redistricting training sessions to Southern Echo partners throughout the south. Also provided GIS data, maps, and training to Southern Echo, community leaders, stakeholders, and subsequently in the field to groups working in the following states; Alabama, Arkansas, Georgia, Florida, Louisiana, Mississippi, New Mexico, North Carolina, South Carolina, and Texas. Specifically, deliverables include map-centered projects centering on education, GOTV, and redistricting.
- **Campaign Legal Center, Washington, DC (2018 –2021)** – Developed illustrative redistricting plans, associated expert reports, depositions, and testimony in the *Holloway v City of Virginia Beach* court case. The Illustrative plans included two majority Hispanic, Black, and Asian combined districts for the purpose of providing evidence of the first prong in *Gingles* for the city of Virginia Beach.
- **Southern Coalition for Social Justice [SCSJ], Durham, NC (2015 - 2018)** - Provided several expert reports, depositions, and testimony for multiple redistricting court cases in North Carolina. Testimony, depositions, and reports included numerous plans at the congressional, state Senate, state House, and local jurisdiction levels. Analyses covered certain district characteristics, including population deviation, political subdivision splits, partisan performance, and incumbent effect analysis.
- **The Rehab Crew, Durham, NC (2017)** - Provided geospatial & demographic analysis as well as website development and the creation of a proprietary application for the use of targeting real estate investment properties.

- **Congressman G.K. Butterfield, NC (2016 & 2021)** - Developed several congressional district plan alternatives for the State of North Carolina. Provided analyses on alternative district configurations.
- **Alabama Democratic Conference (ADC), Montgomery, AL (2015 - 2016)** - Developed state Senate and House redistricting plans for the state of Alabama in response to the *ADC v Alabama* court case. Also, provided a series of thematic maps depicting areas added from the previous plan to the enacted plan, displaying concentrations of African American voters that were added to the enacted plan.
- **Net Communications, Tallahassee, FL (2014 - 2015)** - Generated offline mapping and online web services (ArcGIS.com) of client's energy company's resources and organizational assets. Mapping included demographic, socioeconomic, and other resources of the energy company.
- **National NAACP Office of General Counsel, Baltimore, MD (2012 - 2013)** - Provided project management and developmental support for the creation of a final report for the NAACP National Redistricting Project. Provided planning, organizing, supplemental writing, and interfacing with graphics entity for the complete development of the final report.
- **Congressional Black Caucus Institute (CBC Institute), Washington, DC (2011 - 2012)** - Provided contract duties as the Project Director and Consulting Demographer for the CBC Institute's Redistricting Project. Provided project management, redistricting plan development, review, analysis, advice, and answers to various questions pertaining to redistricting plans, principles, and processes. Focus included districts where Black voters could elect a candidate of choice.
- **Mississippi NAACP, Jackson, MS (2011)** - Developed state Senate plans and analyzed enacted plans that were developed by the State Court.
- **African American Redistricting Collaborative (AARC) of California, Los Angeles, CA (2011)** - Provided demographic and redistricting contracted services. Responsible for developing congressional, state Senate, and state assembly plans for the collaborative. Special focus was given to the southern Los Angeles area (SOLA) and the Bay Area region. In addition to plan development, several socioeconomic maps were developed to show various communities of interest commonalities.  
  
Also, developed a demographic profile using maps and reports of California's congressional, state Senate, and state Assembly districts for the purpose of preparing for the redistricting plan development process by identifying areas of growth throughout the state. The profiles included data from the American Community Survey (ACS) 2005-2009 and the 2010 Census.
- **The Advancement Project, Washington, DC (2011)** - Provided redistricting plan development services and training. Included was the development of a base map for a new seven (7) district plan in New Orleans that was further developed by community groups in Louisiana. The second effort included training a staff person on the use of Maptitude for Redistricting as well as on various redistricting scenarios.
- **Louisiana Legislative Black Caucus (LLBC), Baton Rouge, LA (2011)** - Provided redistricting plan development services. Responsibilities included supporting the Caucus members' efforts to develop state House, state Senate, and congressional redistricting plans. Developed or analyzed over eighty different redistricting plans. The effort also included testifying in front of the Louisiana Senate and Governmental Affairs committee.
- **Community Policy Research & Training Institute (One Voice), Jackson, MS (2011)** - Developed Mississippi State Senate plan along with appropriate reports and a large-scale map.

- **National Black Caucus of State Legislators (NBCSL), Washington, DC (2010)** - Provided services as the Project Director for a 2010 census outreach effort. Developed proposal and managed personnel to generate and execute a strategy to utilize Black state Senate and House legislators to place targeted posters in select hard-to-count (HTC) areas throughout the country.
- **Duke University's Center for REGSS & SCSJ, Durham, NC (2010 - 2011)** - Contracted to serve as one of two Project Coordinators to support an expert preparation workshop hosted by Duke University's REGSS and the SCSJ.

Project Coordinator duties included developing, managing, and providing hands-on training for the Political Cartographer's side of a week-long intensive "redistricting expert" preparation workshop. The workshop trained 18 political cartographers from various parts of the country on all aspects of redistricting plan development and principles. Also, two hands-on redistricting scenarios were created to train large audiences on the plan development process.

### **Democracy South, Virginia Beach, VA (2004 - 2008)**

Senior Technical Consultant - Provided technical, GIS mapping, data analysis, and management support for several projects and civic engagement-related efforts. Major project efforts included:

- Senior Technical Consultant for the National Unregistered Voter Map. Developed a web-based interactive map that allowed visitors to view state/county-level information pertaining to the number of unregistered voters (2009)
- Co-Director of the Hampton Roads Missing Voter Project (a nonpartisan nonprofit voter engagement effort to increase voter participation with a focus on underrepresented population groups). The effort covered the seven major Independent cities in Hampton Roads. Responsibilities included co-managing the overall civic engagement effort and was solely responsible for integrating and processing Catalist voter data into targeting maps and walk lists for all focus areas. Directly Responsible for overseeing the operations in Hampton, Newport News, Portsmouth, and Suffolk, Virginia (2008)
- Senior Technical Consultant for Civic Engagement Efforts. Provided telephone technical voter database support to 17 USAction state partners in 2004; and 12 USAction state partners in 2006. Trained client on VBASE voter data software; Performed voter data conversion; and voter targeting assistance.

### **Congressional Black Caucus Institute, Redistricting Project, Washington D.C. (2001 - 2003)**

Consulting Demographer - Provided services that included the development, review, and analysis of over 75 congressional district plans. Responsible for all setup and configuration of hardware and GIS software and performed all development and analyses of redistricting plans. Congressional district plans were developed for 22 states. Also, performed as a redistricting expert advisor in a consolidated U.S. District Court Voting Rights case in Alabama.

### **National Voter Fund, Washington, D.C. (2000)**

GIS Consultant (in a consulting partnership of Hagens & Fairfax) - Developed hundreds of precinct targeting maps for a civic engagement effort designed to increase the turnout in the November 2000 election. Efforts included: geocoding voter data, census data integration, and precinct mapping.

### **Norfolk State University, Poli. Science & Computer Science Dept., Norfolk, Virginia (1996 - 2001)**

Adjunct Faculty - Provided instruction to students for BASIC Programming, Introduction to Computer Science, and Computer Literacy courses.

**GeoTek. Inc. (formally GIS Associates), Virginia Beach, VA (1992 - 1995)**

Consultant and Co-owner - Provided geodemographic research and analysis; client technical & training support; hardware/software system installation; and redistricting manual/ brochure development. Major clients and tasks included:

- New York City Housing Authority - Redistricting Training
- Maryland State Office of Planning - Redistricting Tech Support
- City of Virginia Beach, VA Planning Dept. - Redistricting Training/Tech Support
- City of Norfolk, VA Registrar - Redistricting Training/Tech Support
- City of Chesapeake, VA Registrar - Precinct Realignment

**Norfolk State University, Political Science Dept., Norfolk, Virginia (1991 - 1999)**

GIS Consultant - Provided a variety of geographic and demographically related tasks. Major Redistricting related tasks included:

- Installed and operated the LogiSYS ReapS software that was used to perform the bulk of redistricting plans. Performed the intricate ReapS processing of the U.S. Census Bureau Topographically Integrated Geographic Encoded Referencing (TIGER) line files, Public Law 94-171 (PL94-171) demographic data, and the STF socioeconomic data series.
- Developed over 200 hundred redistricting plans, located in over 60 jurisdictions, in the states of Florida, Louisiana, North Carolina, Texas, and Virginia. Developed plans from city/county to legislative to congressional district.
- Traveled to and trained several university faculty personnel on setting up and utilizing the ReapS redistricting system. Also, trained on redistricting plan development principles.

Major GIS-related tasks included:

- Performed a study commissioned by the U.S. Department of Transportation to analyze the ethnic differences in commuting behavior. This study extensively utilized the Summary Tape File 3 A (STF3 A) and Public Microdata Sample (PUMS) data to locate, map, and report the frequency and average travel time to and from work for: Miami, FL MSA; Kansas City, MO-KS MSA; and Detroit, MI MSA.
- Performed a study funded by the City of Norfolk, VA, and NSU School of Business that determined and analyzed the trade area of a section located in Norfolk, VA. Major duties included: geocoding customer addresses, producing address point maps, and developing demographic reports for the project.
- Performed a study commissioned by the U.S. Department of Housing and Urban Development (HUD) to revitalize a neighborhood located in Norfolk, VA. The purpose of the GIS component was to first establish a socioeconomic base-line then track the progress of the revitalized area as well select surrounding areas. Geocoded address locations, generated point as well as demographic thematic maps, and produced reports of the target areas.
- Provided demographic analysis of proposed newly incorporated areas in Florida for local Florida civic organizations.

**Cooperative Hampton Roads Org. for Minorities in Engineering, Norfolk, VA (1991 - 1992)**

Computer Consultant - Designed and developed a menu-driven student database, used to track hundreds of minority Junior High and High School students that were interested in pursuing science or engineering degrees.

**Norfolk State University, School of Education, Norfolk VA (1990 - 1991)**

Technical Consultant/Computer Lab Manager- Provided a variety of support, including hardware and software installation; faculty workshops; course instruction; Network Administrator; and technical support.

**Engineering and Economics Research (EER) Systems (1989)**

Technical Consultant - Coordinated and participated in writing, editing, and formatting technical test documents; central role in the development of the Acceptance Test Procedures for the initial phase of a multi-million dollar Combat Maneuver Training Complex (CMTC) in Hohenfels, Germany; the final review and editing of all test documentation.

**Executive Training Center (ETC). Newport News, VA (1988 - 1989)**

Vice President & Co-founder - Managed over 11 part-time and full-time employees; assisted in developing and implementing company policies; performed the duties of the Network Administrator for a Novell-based computer training network; and taught several courses by substituting for instructors when necessary.

**Engineering & Economics Research (EER) Systems. Newport News, VA (1986 - 1987)**

Hardware Design Engineer and Electronics Engineer - Provided engineering and select project management support for the development of the following million/multi-million dollar project efforts:

- Baseline Cost Estimate (BCE) to be used in the procurement of the Combat Maneuver Training Complex - Instrumentation System (CMTC-IS)
- Operational and Maintenance (O&M) Support Plan at the National Training Center (NTC)
- Quality Assurance Surveillance Plan for the O&M Support Plan at the NTC; Configuration Management Plan for CMTC
- Requirements Operational Capabilities (ROC) Analysis for an instrumentation System at the U.S. Army Ranger School, Georgia;
- ROC Analysis for an Instrumentation System at Fort Chaffee, Arkansas;
- Suggested Statement of Work for the Digital Data Entry Device (DDED); and the Concept Formulation Package and Requirements Definition to Support Interface and Integration of Red Flag at the NTC:
- Phase II of a multi-million dollar GIS-based concept test demonstration. Performing as Assistant Test Director (ATD) - liaison between the Government Director Army Ranges and Targets (DART) personnel and EER Systems' personnel; and assumed the role of Test Director when required (1987).
- Suggested Statement of Work (SOW) for a \$1 million procurement of Multivehicle Player Units (MVPUs) at the NTC. Performed as Project Task Manager for a team of engineers, computer programmers, and technical support personnel in the development of a position location player unit for the Army (1986).

**Teledyne Hastings-Raydist, Hampton, VA (1982 - 1986)**

Hardware Design Engineer - Designed and developed custom flow and vacuum measuring products; Project Manager for the production and completion of a \$.25 million flow measuring system; Electrical Engineer - Chiefly responsible for developing special products for customers.

## **Major Litigation Clients & Testimony Related Efforts:**

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### **Election Law Clinic at Harvard Law School, Cambridge, MA (2022)**

Developed an expert report that contained a series of thematic and demographic map and table analyses for the Jacksonville Branch of the *NAACP et al. v. City of Jacksonville et al* redistricting court case. The map and table analysis related to Jacksonville, FL's city council enjoined and proposed redistricting plans. The analysis and report included various aspects that define plan differences, such as: core retention by race/ethnicity; compactness measurements; population deviation; district configurations using silhouettes; splits of neighborhoods; and population density.

### **Southern Coalition for Social Justice (SCSJ), Durham, NC (2022 – Present).**

Developed an expert report that included opinions on the state's expert report in the *LULAC et al v. Abbott* Texas state legislative redistricting court case. The report responded to any conclusions regarding minority vote dilution, specifically concerning the Fair Maps proposed plans.

### **NAACP LDF, New York, New York, NY (2022 - Present)**

Developed an illustrative redistricting plan and associated expert report for the *Robinson v. Ardoin* redistricting court case. The illustrative plan included a second additional majority Black district as opposed to the state's plan. The plan, report, and testimony provided evidence of the first prong in *Gingles* in proving dilution of Black voting strength in violation of Section 2 of the Voting Rights Act (VRA). The effort included plan development, expert report, rebuttal report, and testimony.

### **ACLU, New York, New York, NY (2021 – Present)**

Developed an illustrative redistricting plan and associated expert report for the *Arkansas State Conference NAACP v. Arkansas Board of Apportionment* preliminary injunction case. The illustrative plan included five additional majority Black districts as opposed to the Board of Apportionment plan. The plan, report, and testimony provided evidence of the first prong in *Gingles* in proving dilution of Black voting strength in violation of Section 2 of the Voting Rights Act (VRA). The effort included plan development, expert report, rebuttal report, and testimony.

### **Campaign Legal Center, Washington, DC (2018 – 2020)**

Developed multiple illustrative redistricting plans and associated expert reports for *Latasha Holloway v City of Virginia Beach* court case. The illustrative Plans included two majority Hispanic, Black, and Asian combined (Coalition) districts for the purpose of providing evidence of the first prong in *Gingles* in the section 2 court case. The effort included an additional rebuttal, supplemental report, deposition, and testimony.

### **Virginia NAACP, Richmond, VA (2018)**

Developed a statewide remedial plan for *Bethune-Hill v. Virginia State Bd. of Elections*. The plan corrected 11 unconstitutional racial gerrymandered state House districts in the Richmond, Peninsula, and Southside Hampton Roads areas.

### **Southern Coalition for Social Justice (SCSJ), Durham, NC (2018)**

Developed a demonstrative remedial redistricting plan and associated expert report as well as provided a deposition for *North Carolina State Conference of NAACP Branches v. Lewis Wake County Superior Court* case. The demonstrative remedial plan corrected the two Wake County, N.C. House Districts declared by a federal court to be racially gerrymandered districts (HD33 & HD38). The expert report provided a narrative that not only discussed my results but also provided insight for the Court on how a map drawer would reasonably go about fixing racially gerrymandered districts and still comply with the state constitution's prohibition on mid-decade redistricting.

**Texas NAACP, San Antonio, TX, (2017)**

Provided expert report, deposition, and testimony for the *Perez v. Abbott* US Federal District Court Case. Analyses focused on certain redistricting criteria, including population deviation, compactness, political subdivision splits, and communities of interest for congressional and House plans. Additional analysis was performed on demographic projections for certain congressional and State House districts.

**Southern Coalition for Social Justice (SCSJ), Durham, NC (2015 - 2016)**

Provided expert testimony, deposition, and expert report for the *City of Greensboro v The Guilford County Board of Elections* U.S. District Court Case. Deposition and report included several district plans for the city council of Greensboro, NC, and analyzed certain characteristics, including population deviation, political subdivision splits, partisan performance, and incumbent effect analysis.

Provided expert testimony and report for the *Covington v North Carolina* federal redistricting court case. The testimony included an analysis from *Dickson v Rucho* (also *NAACP v North Carolina*) of compactness on state legislative House and Senate districts.

Provided expert testimony and report for the *Wright v North Carolina* federal redistricting court case. The testimony and report included an analysis of population deviation, compactness, partisan impact, and incumbent residences for county commission and school board plans.

**Alabama Democratic Conference (ADC), Montgomery, AL (2015 - 2016)**

Developed Senate and House redistricting plans for the state of Alabama for the *ADC v Alabama* court case. Provided deposition on the creation of the plan. Also, generated a series of thematic maps depicting areas added from the previous benchmark plan to the enacted plan, displaying concentrations of African American voters that were added to the enacted plan.

**Southern Coalition for Social Justice (SCSJ), Durham, NC (2014)**

Provided expert testimony, report, and deposition for the federal redistricting court case, *Perez v. Perry* of Texas. The report included an analysis of population extrapolations and projections for several submitted plans for select congressional and House districts.

**North Carolina NAACP, Raleigh, NC (2012)**

Provided expert opinions and analysis in an affidavit for the *NC NAACP v. State of North Carolina* federal redistricting case (later *Dickson v Rucho*). The affidavit included an examination of compactness measurements pertaining to the Congressional, State Senate, and State House "Benchmark" plans, several approved plans, and several legislative submitted plans. The report also contained county splits for the target districts.

**Southern Coalition for Social Justice (SCSJ), Durham, NC (2011)**

Provided expert opinions and analysis in an affidavit for the *Moore v. State of Tennessee* redistricting case. The affidavit included an analysis of county splits comparing State Senate "Benchmark" plans, the approved plan, and several legislative submitted plans.

**Texas NAACP, San Antonio, TX (2011)**

Provided expert report, deposition, and testimony for the federal redistricting court case *Perez v. Perry*. Testimony covered the evaluation of traditional redistricting criteria of the Congressional and House-approved plans compared to several proposed or legislative submitted plans.

**Louisiana Legislative Black Caucus, Baton Rouge, LA (2011)**

Provided expert testimony in front of the Senate and Governmental Affairs committee. Testimony included the analysis of two redistricting plans comparing ideal population deviation, political subdivision splits (Parishes), and compactness ratios. Also, developed a redistricting plan and testified in front of the House

and Governmental Affairs in support of a new majority-minority (African American) congressional district in Louisiana.

**Morrison & Foerster LLP, Los Angeles, CA (2004)**

Provided expert report on several state Senate plans for the *Metts v. Murphy* Rhode Island court case. The report contained analyses of communities of interest areas that were not included in the state's enacted plan of the only majority-minority district.

**Congressional Black Caucus Institute, Redistricting Project, Washington D.C. (2002)**

Performed as the redistricting mapping expert for Congressman Hilliard in a consolidated U.S. District redistricting court case in Alabama (*Montiel v. Davis* and *Barnett v. Alabama*). Developed the submitted plan and provided advice to legal counsel for the court case.

**Council of Black Elected Democrats (COBED) New York State, New York, NY (2002)**

Performed as one of the redistricting experts (*Allen v Pataki/Rodriguez v Pataki*) by developing several New York State congressional district plans that were presented by COBED.

**Miami-Dade, Florida (1993)**

Provided expert technical redistricting support as one-half of the Expert Master's Team for the remedial Plan (*Meek v. Metropolitan Dade County*). Developed over 50 commissioner district plans for the county as well as the final adopted Plan for the metro Dade County.

**NAACP Legal Defense and Educational Fund (LDEF), New York, NY (1993)**

Provided expert technical support for the *Shaw v. Reno* Supreme Court case (via Norfolk State University). Analyzed and compared various compactness ratios for congressional districts throughout the U.S. The results were compared to the 12<sup>th</sup> congressional district of North Carolina. Also, developed several alternative congressional district plans.

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**Major GIS/Demographic/Redistricting Training and Presentations:**

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**Southern Echo (2021)**

Presented multiple training sessions (11 planned) on various aspects of redistricting. Included both presentations and ultimately hands-on (Dave's Redistricting)

**Crowd Academy (2020 – 2021)**

Presented multiple Training sessions (>25) that center on "How the lines are Drawn" which focuses on the plan development activities of redistricting.

**Crescent City Media Group (2021)**

Presented ten three-hour-long training sessions on various aspects of redistricting. Included both presentations and hands-on (Maptitude for Redistricting)

**NAACP LDF/MALDEF Expert Convening (2021)**

Provided multiple sessions to potential future experts on expert report development, giving depositions, and providing testimony.

**SIF Voting Rights Convening (2021)**

Presented on a panel the unique aspects and issues pertaining to the 2020 round of redistricting.

## **Major GIS/Demographic/Redistricting Training and Presentations (cont.):**

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### **SIF Voting Rights Convening (2020)**

Presented on a panel various preparatory aspects and questions that should be addressed prior to the development of plans.

### **Delta Days in the Nation's Capital, Washington, DC (2020)**

Provided panel presentation on suggested efforts in preparation for the next round of redistricting. Plenary presentation to several hundred Delta Sigma Theta (DST) sorority sisters throughout the country.

### **William and Mary, Williamsburg, VA (2019)**

Presented lecture to the GIS and Districting course students centering on improving as well as potential adverse trade-offs from improvements of the adopted redistricting plan chosen by the special masters of the *Bethune-Hill v. Virginia State Bd. of Elections* redistricting case.

### **Southern Echo, Jackson, Mississippi (2019)**

Provided detailed training/presentation (3 hours) on various aspects of redistricting. Topics included: Relevant redistricting court cases, traditional redistricting criteria, and redistricting data.

### **William and Mary, Williamsburg, VA (2018)**

Presented lecture to the GIS and Districting course students centering on aspects of the *Bethune-Hill v. Virginia State Bd. of Elections* redistricting case. Discussion pertained to how to develop a plan that corrected the 11 unconstitutional racial gerrymandered states House districts.

### **Congressional Black Caucus Institute, Washington, DC (2016)**

Presented at the annual legislative conference in Tunica, MS. Presented the election demographic analysis for the 2016 presidential and Senate elections. Panel also included Congressman Cedrick Richmond (L.A.), Congressman Sanford Bishop (G.A.), and Professor Spencer Overton.

### **Coalition of Black Trade Unionists (CBTU), Chicago, IL (2015)**

Presented at the annual CBTU conference on the election panel that included Congressman Al Green (TX) and Congressman Bobby Rush (I.L.).

### **Nobel Women's Initiative, Washington, DC (2015)**

Presented on a panel at the annual conference in San Diego, CA, on the upcoming 2020 census.

### **Tennessee NAACP, Nashville, TN (2011)**

Provided redistricting training session on the mapping and demographic aspects of Redistricting.

### **Congressional Black Caucus Institute, Washington, DC (2002 - 2012, 2014)**

Presented "The Demographics of Campaigns" twelve times at the institute's annual political campaign "Boot Camp." The presentation covers how to locate and utilize demographic data for political campaigns.

### **Congressional Black Caucus Foundation (CBCF), Washington, DC (2011)**

Presented as one of the panelists at the "Judge A. Leon Higginbotham" Braintrust at the CBC Annual Legislative Conference. The panel was moderated by Congressman Mel Watt.

### **The Advancement Project, Washington, DC (2011)**

Trained staff GIS person on Maptitude for Redistricting as well as on redistricting scenarios.

### **National Association for the Advancement of Colored People, Baltimore, MA (2011)**

Provided training session on "Redistricting Mapping Overview" at the organization's national redistricting training seminar for state and local chapters.

## **Major GIS/Demographic/Redistricting Training and Presentations (cont.):**

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### **Congressional Black Caucus Institute, Washington, DC (2010)**

Presented at the annual CBC Institute conference in Tunica, MS (The panel included Congressman John Lewis and Congressman Jim Clyburn). Outlined two critical issues that would surface in the 2010 round of redistricting: 1) Prison-based Gerrymander; and 2) The use of Citizen Voting Age Population (CVAP).

### **Community Census and Redistricting Institute (CCRI), Durham, NC (2010)**

Developed, managed, and provided hands-on training for the Political Cartographer's side of a week-long intensive "redistricting expert" preparation workshop. The workshop trained 18 political cartographers on all aspects of plan development.

### **North Carolina University's Center for Civil Rights, Chapel Hill, NC (2010)**

Provided presentation on "Redistricting Laws & GIS" at the *Unfinished Work* conference. The presentation outlined the evolution of major redistricting laws and GIS and their impact on minority representation.

### **NAACP Legal Defense Fund AIRLIE Conference, AIRLIE, VA (2010)**

Provided training using hands-on "paper" redistricting scenarios to voting rights advocates on developing a plan without the use of computers.

### **Young Elected Officials, Los Angeles, CA (2010)**

Provided training using hands-on "paper" redistricting scenarios to young legislators on developing a plan without the use of computers.

### **Young Elected Officials, Alexandria, VA (2010)**

Provided overview training on the major aspects of redistricting to young legislators.

### **North Carolina University's Center for Civil Rights, Chapel Hill, NC (2006)**

Provided presentation on "Congressional Elections Won by African Americans Race & Ethnicity District Perspective (1960 - 2004)" at the *Who Draws the Lines? The Consequences of Redistricting Reform for Minority Voters* conference.

### **Howard University - Continuing Education - HBCU GIS Workshop, Washington, DC (2002)**

Provided presentation on redistricting and the use Maptitude for Redistricting to faculty members of Historically Black Colleges and Universities (HBCUs).

### **Norfolk State University Redistricting Project Training Workshops (1991 - 1998)**

Provided redistricting training to the following:

- Alabama State University, Montgomery, Alabama
- Albany State University, Albany, Georgia
- Florida A & M, Tallahassee, Florida
- National Conference of Black Political Scientists, Atlanta, Georgia Conference
- Norfolk State University, Norfolk, Virginia
- North Carolina A & T State University, Greensboro, North Carolina
- North Carolina Central University, Durham, North Carolina
- Southern University, Baton Rouge, Louisiana
- Williams College, Williamstown, Massachusetts

## Major GIS/Redistricting/Voter Data Software Experience:

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- ArcGIS - GIS Software - Primary GIS Software after 2012 ([ESRI](#))
- ArcGIS Online – Including Story Maps & Web Application Builder ([ArcGIS.com](#))
- GRASS GIS – Open Source GIS ([OSGeo](#))
- Maptitude for Redistricting - Primary Redistricting software, since 2001 ([Caliper](#))
- ESRI Redistricting Online - Beta Tester ([ESRI](#))
- Public Mapping Project – Initial Advisory Board Member ([an open source online software](#))
- ReapS Redistricting and Reapportionment System - Redistricting software, 1990s ([LogiSYS](#))
- Voter Activation Network System [NPGVAN](#)
- Voterlistonline.com Aristotle software [Aristotle](#)

## GIS Skillset/Coding Languages:

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- |                       |                        |              |
|-----------------------|------------------------|--------------|
| • Geocoding Data      | • Suitability Analysis | • Python     |
| • Linear Referencing  | • Image Classification | • PostgreSQL |
| • Digital Cardinality | • ArcGIS Web Services  |              |
| • Spatial Statistics  | • pdAdmin              |              |

## ESRI Training Certificates:

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- Learning ArcGIS Desktop (for ArcGIS 10) - 24 hrs training
- Turning Data into Information Using ArcGIS 10 - 18 hrs training
- Basics of Raster Data (for ArcGIS 10) - 3 hrs training
- Using Raster Data for Site Selection (for ArcGIS 10) - 3 hrs training
- Working with Geodatabase Domains and Subtypes in ArcGIS - 3 hrs training
- Network Analysis Using ArcGIS - 3 hrs training

## Publications:

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### Books

- *An Introduction to the Presidential Trend*, Statistical Press, March 2015
- *The Presidential Trend*, Statistical Press, December 2013
- *A Step by Step Guide to Using Census 2000 Data*, MediaChannel LLC, March 2004. Also included was a companion CD-ROM (sold through various Census-related workshops and training sessions and used in a political science course).

### Manuals

- *A Beginner's Guide To Using Census 2000 Data*, November 2002 (Co-authored- developed for the U.S. Census Bureau's Census Information Centers)

### Articles

- "Precision Voter Targeting: GIS Maps Out a Strategy," Geo Info Systems, November 1996 (Co-authored one of the first articles published on using modern-day GIS for voter targeting).

## **Appendix B**

### **Core Constituencies Report for Duval County, FL's 2011 and P3 School Board Districts**

User: Tony Fairfax

Plan Name: Duval County FL SB P3

Plan Type: Duval County FL Cnty SB

## Core Constituencies

Friday, June 23, 2023

3:25 PM

From Plan: **Duval County FL SB 2011**

### Plan: Duval County FL SB P3, District 1 --

140,801 Total Population

	Population	NH_Wht	NH_AP_BlK
Dist. 1	135,441 (96.19%)	68,553 (96.98%)	38,603 (97.11%)
Dist. 2	0 (0.00%)	0 (0.00%)	(0.00%)
Dist. 3	4,348 (3.09%)	1,710 (2.42%)	772 (1.94%)
Dist. 4	1,012 (0.72%)	428 (0.61%)	378 (0.95%)
Dist. Unassigned	0 (0.00%)	0 (0.00%)	(0.00%)
Total and % Population		70,691 (50.21%)	39,753 (28.23%)

### Plan: Duval County FL SB P3, District 2 --

149,007 Total Population

	Population	NH_Wht	NH_AP_BlK
Dist. 1	0 (0.00%)	0 (0.00%)	(0.00%)
Dist. 2	133,517 (89.60%)	94,275 (91.55%)	12,130 (81.57%)
Dist. 3	4,531 (3.04%)	2,536 (2.46%)	679 (4.57%)
Dist. 7	10,959 (7.35%)	6,162 (5.98%)	2,061 (13.86%)
Dist. Unassigned	0 (0.00%)	0 (0.00%)	(0.00%)
Total and % Population		102,973 (69.11%)	14,870 (9.98%)

### Plan: Duval County FL SB P3, District 3 --

146,103 Total Population

	Population	NH_Wht	NH_AP_BlK
Dist. 1	0 (0.00%)	0 (0.00%)	(0.00%)
Dist. 2	3,973 (2.72%)	2,249 (2.92%)	513 (1.95%)
Dist. 3	136,005 (93.09%)	70,870 (92.05%)	25,172 (95.59%)
Dist. 7	6,125 (4.19%)	3,873 (5.03%)	648 (2.46%)
Total and % Population		76,992 (52.70%)	26,333 (18.02%)

### Plan: Duval County FL SB P3, District 4 --

135,603 Total Population

	Population	NH_Wht	NH_AP_BlK
Dist. 1	8,815 (6.50%)	4,133 (14.24%)	3,112 (3.25%)
Dist. 4	99,183 (73.14%)	22,381 (77.11%)	68,547 (71.67%)
Dist. 5	27,605 (20.36%)	2,511 (8.65%)	23,983 (25.08%)
Total and % Population		29,025 (21.40%)	95,642 (70.53%)

### Plan: Duval County FL SB P3, District 5 --

136,827 Total Population

	Population	NH_Wht	NH_AP_BlK
Dist. 3	0 (0.00%)	0 (0.00%)	(0.00%)
Dist. 4	25,366 (18.54%)	6,502 (11.39%)	16,751 (27.12%)
Dist. 5	71,661 (52.37%)	21,072 (36.90%)	40,278 (65.21%)
Dist. 6	39,800 (29.09%)	29,532 (51.71%)	4,741 (7.68%)

**Core Constituencies**

Duval County FL SB P3

From Plan: **Duval County FL SB 2011**

**Plan: Duval County FL SB P3, District 5 -- 136,827 Total Population**

	<b>Population</b>	<b>NH_Wht</b>	<b>NH_AP_Blk</b>
Total and % Population		57,106 (41.74%)	61,770 (45.14%)

**Plan: Duval County FL SB P3, District 6 -- 142,157 Total Population**

	<b>Population</b>	<b>NH_Wht</b>	<b>NH_AP_Blk</b>
Dist. 4	6,812 (4.79%)	5,090 (7.92%)	1,070 (2.19%)
Dist. 5	35,886 (25.24%)	11,573 (18.00%)	15,999 (32.70%)
Dist. 6	99,459 (69.96%)	47,640 (74.09%)	31,864 (65.12%)
Total and % Population		64,303 (45.23%)	48,933 (34.42%)

**Plan: Duval County FL SB P3, District 7 -- 145,069 Total Population**

	<b>Population</b>	<b>NH_Wht</b>	<b>NH_AP_Blk</b>
Dist. 7	145,069 (100.00%)	90,949 (100.00%)	18,341 (100.00%)
Total and % Population		90,949 (62.69%)	18,341 (12.64%)