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

JACKSONVILLE BRANCH
OF THE NAACP, et al,

Plaintiffs,

v.

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

CITY OF JACKSONVILLE, et al,

Defendants.

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NOTICE OF FILING MATERIALS IN SUPPORT OF PLAINTIFFSÕ OBJECTIONS TO THE CITYÕS PROPOSED REMEDIAL PLAN AND SUBMISSION OF ALTERNATIVE PLANS

Plaintiffs give notice of filing the following in support of their Objection to the CityÕs Proposed Remedial Plan and Submission of Alternative Remedial Plans:

ECF No.	Description	No. of Pages
	Expert Reports	
89-1	Expert Report of Tony Fairfax	140
89-2	Expert Report of Dr. Kosuke Imai	6
89-3	Expert Report of Dr. Sharon Austin	60
	Remedial Process Press Coverage	
89-4	Declaration of Nicholas Warren	3
89-5	Ex. A Ð Lucia Viti, A Court Blocks City Council and School Boa Maps Signed into Law by Mayor Lenny Curry in March, ACTION NEWS JAX (Oct. 18, 2022), https://www.actionnewsjax.com/news/local/court-blocks-city-council-schoolboard-	2

Anthony "Tony" Fairfax

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Email: fairfax@censuschannel.com

Experience Highlights:

- 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:

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:

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 plans for the town.
- **My Brother's Keeper Alliance, Chicago, IL (2022 – Present)** – Providing demographic and socioeconomic analysis of select neighborhood communities.
- **City of Baltimore, MD Office of Council President (2022)** – 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.
- **The ACLU, New York, NY (2021 - 2022)** – Providing expert plan development services centering on the states of Alabama and Arkansas.
- **The Power Coalition, 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 to community leaders and local/state legislators.
- **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 - Present) - 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 of 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 US). 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 level. 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 large-scaled 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 to include 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 (I986).

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:

NAACP, New York, New York, NY (2022)

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 – 2022)

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 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 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 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 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 12th congressional district of North Carolina. Also, developed several alternative congressional district plans.

Major GIS/Demographic/Redistricting Training and Presentations:

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.):

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.):

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:

- 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)
- GIS Plus (the precursor to Maptitude Software in the mid to late 1990s) – User (Caliper)
- ReapS Redistricting and Reapportionment System – Redistricting software, 1990s (LogiSYS)
- Voter Activation Network System NPGVAN
- Voterlistonline.com Aristotle software Aristotle

GIS Skillset/Coding Languages:

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

ESRI Training Certificates:

- 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:

<u>Books</u>

- *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).

<u>Manuals</u>

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

<u>Articles</u>

- "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).

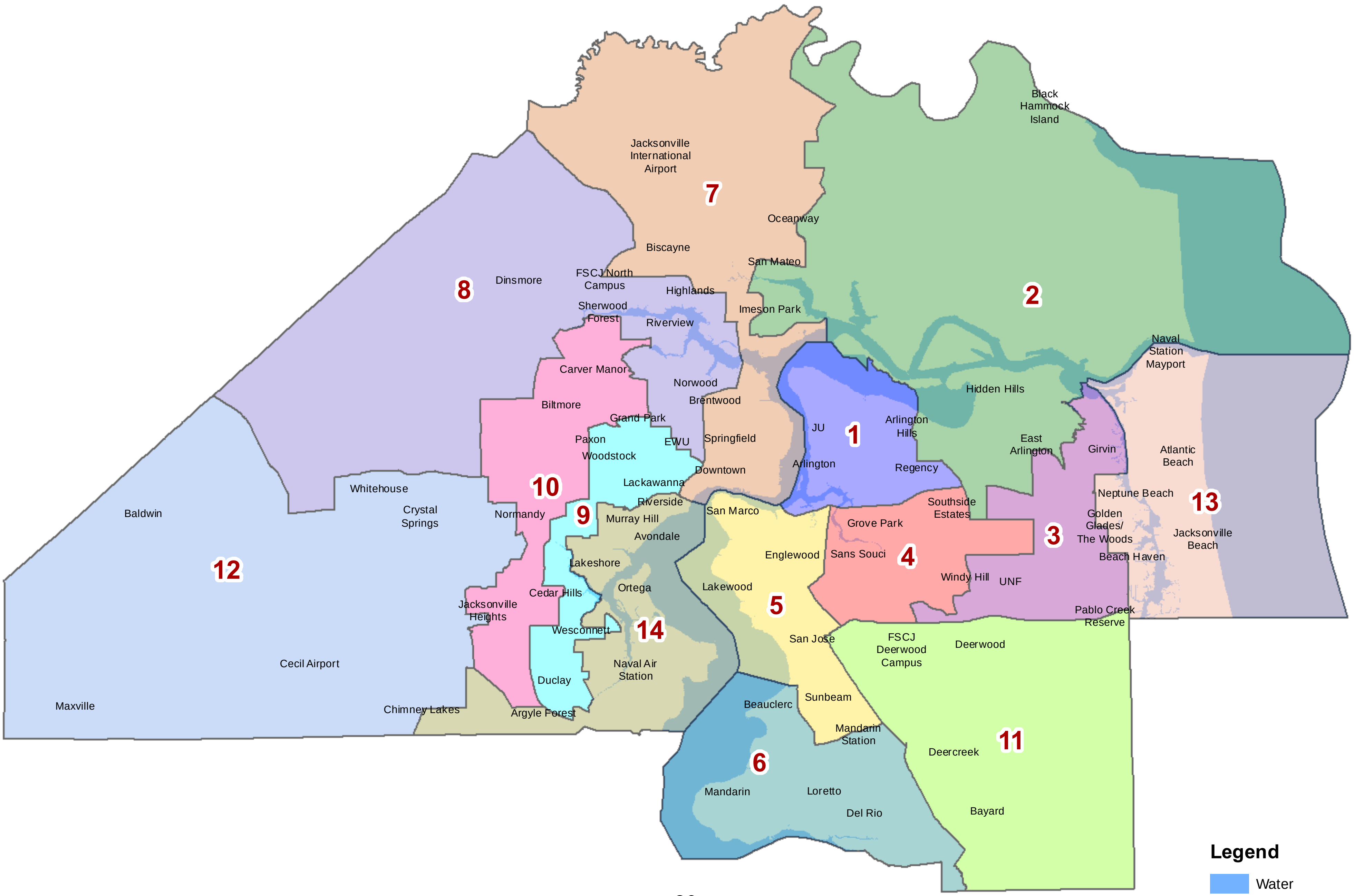
Appendix B1

District Maps of Plans

Jacksonville, FL

Enjoined Plan

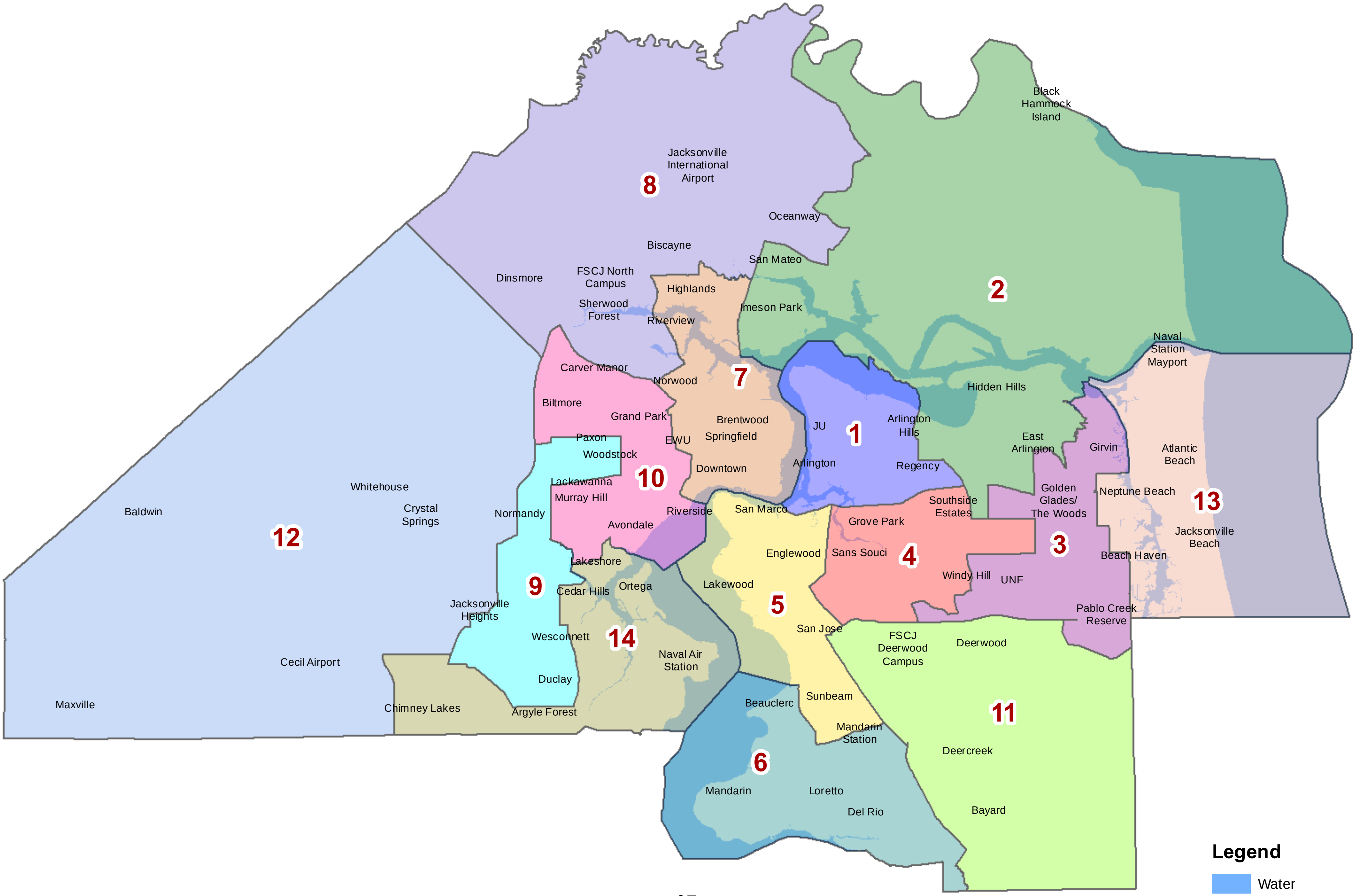
w/Neighborhoods



Jacksonville, FL

2022-800 Plan

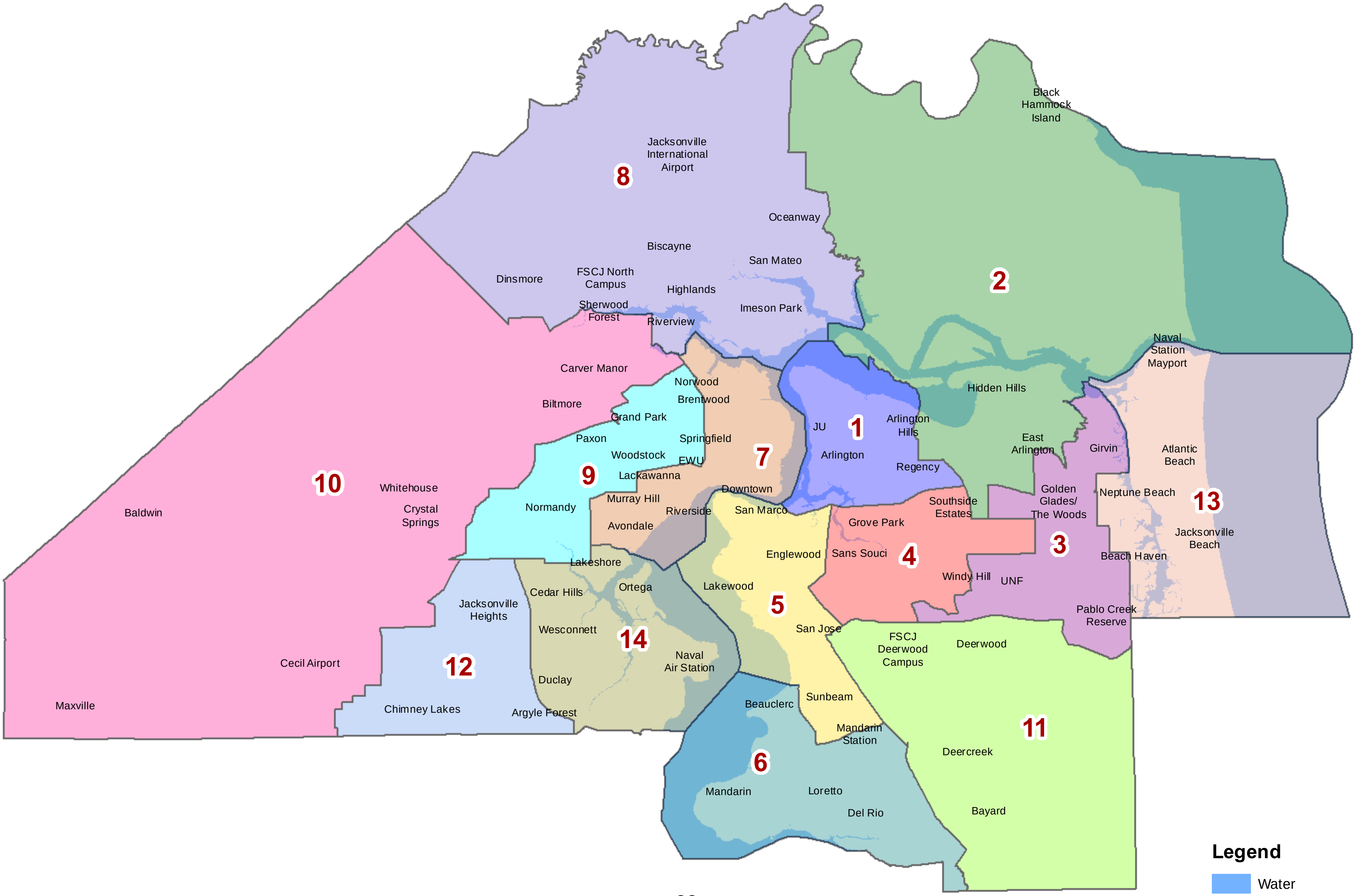
w/Neighborhoods



Jacksonville, FL

Plaintiffs' 1 Plan

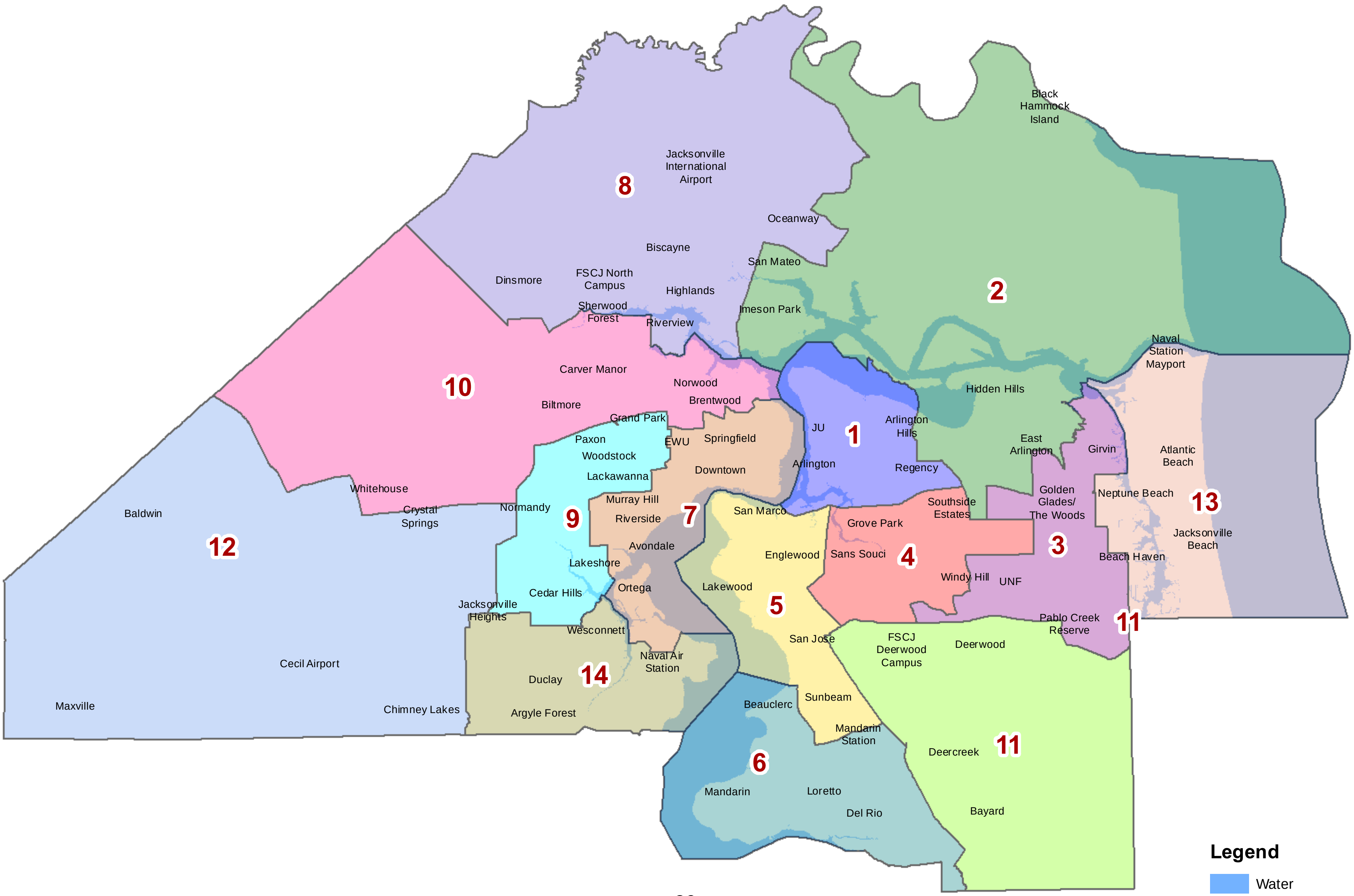
w/Neighborhoods



Jacksonville, FL

Plaintiffs' 2 Plan

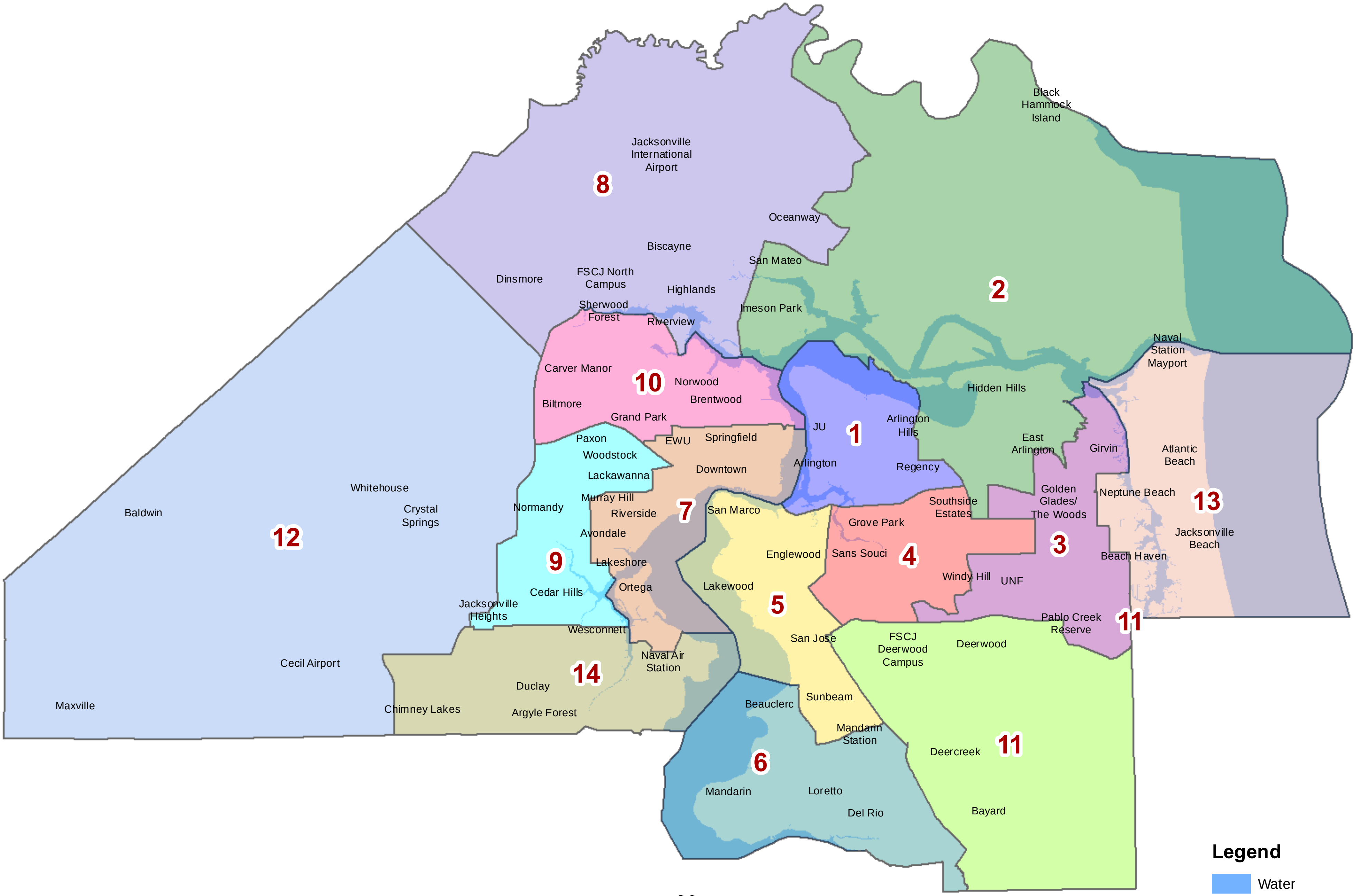
w/Neighborhoods



Jacksonville, FL

Plaintiffs' 3 Plan

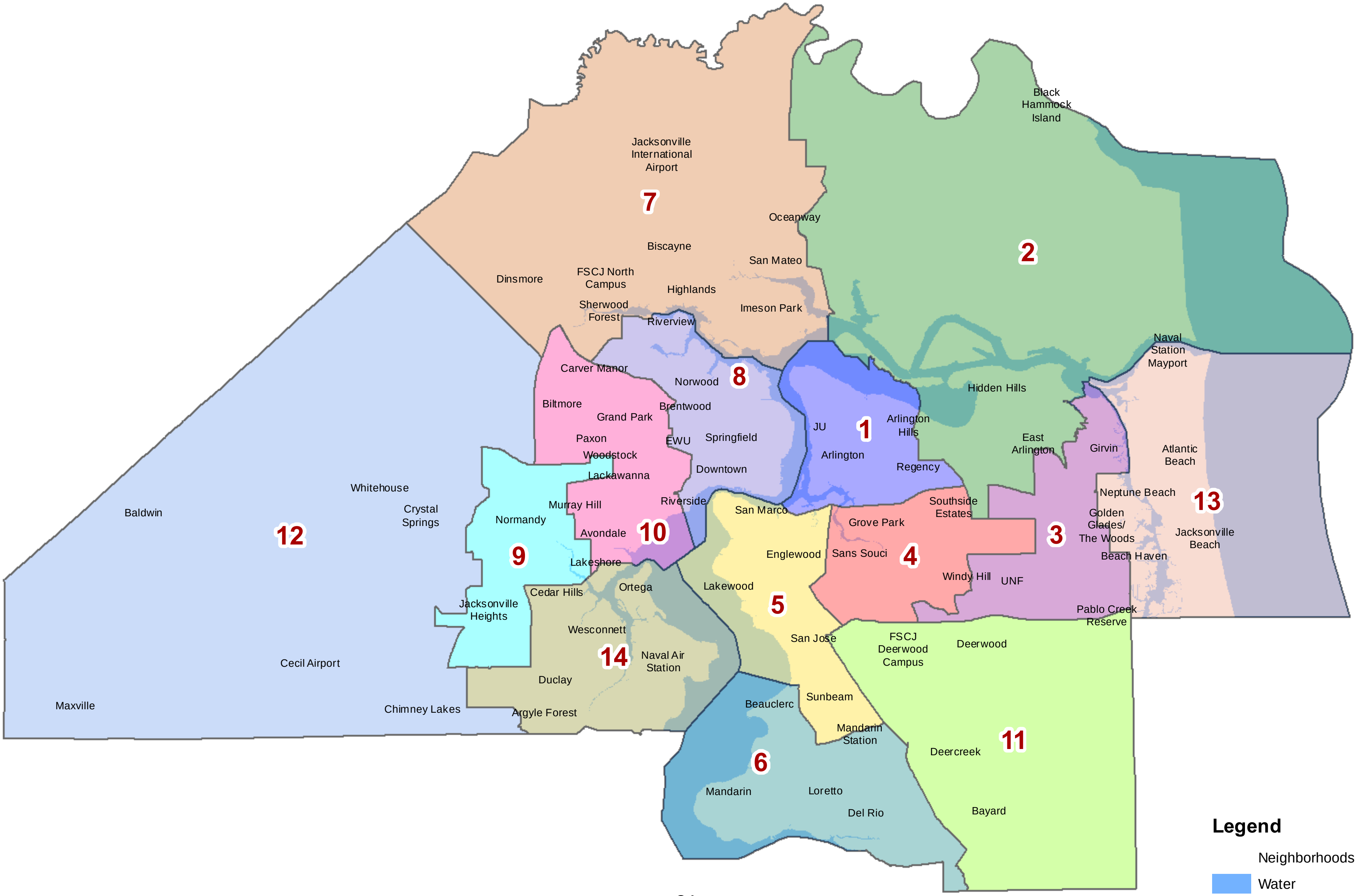
w/Neighborhoods



Jacksonville, FL

Lime Plan

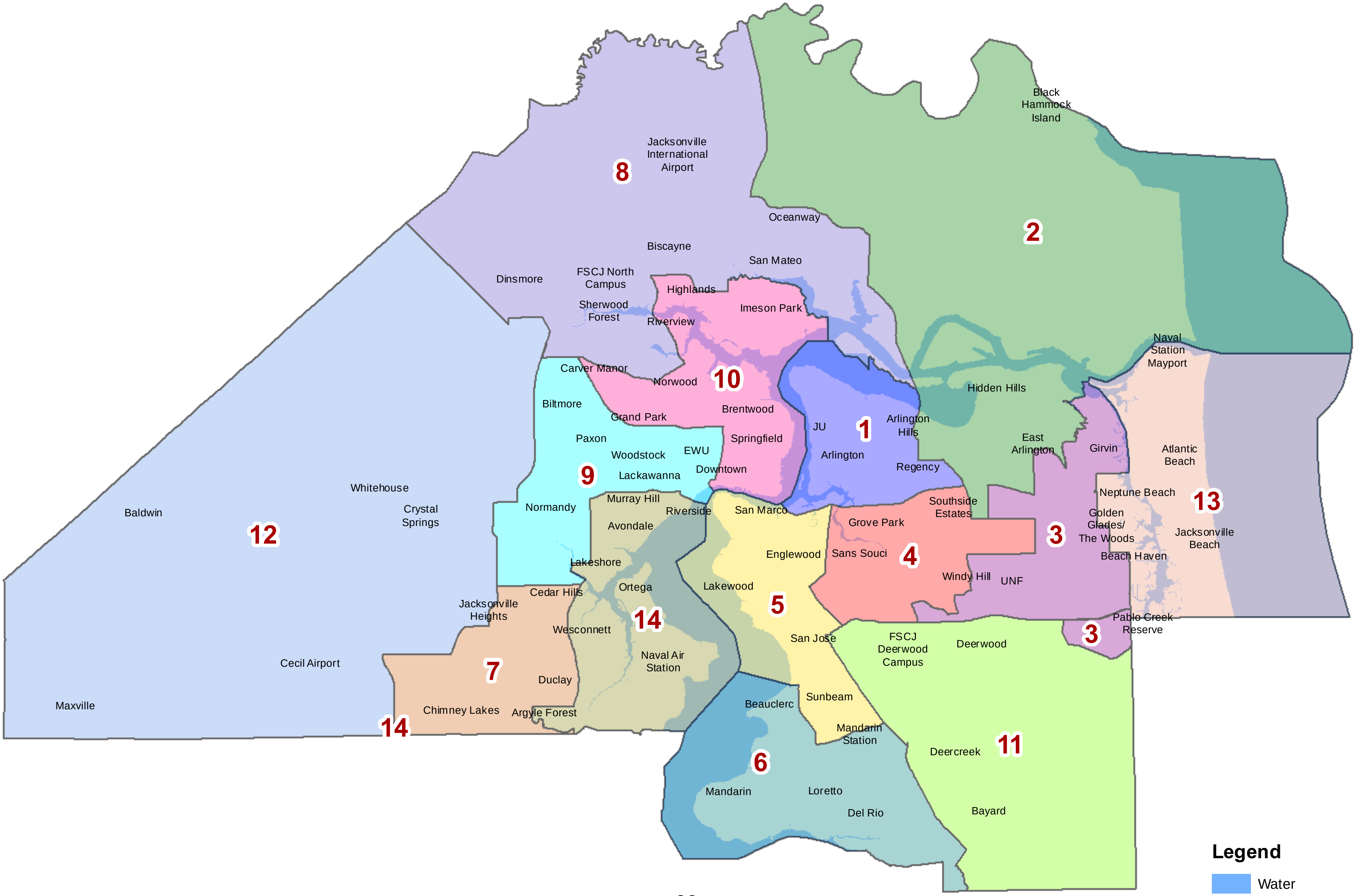
w/Neighborhoods



Jacksonville, FL

Maroon IIa Plan

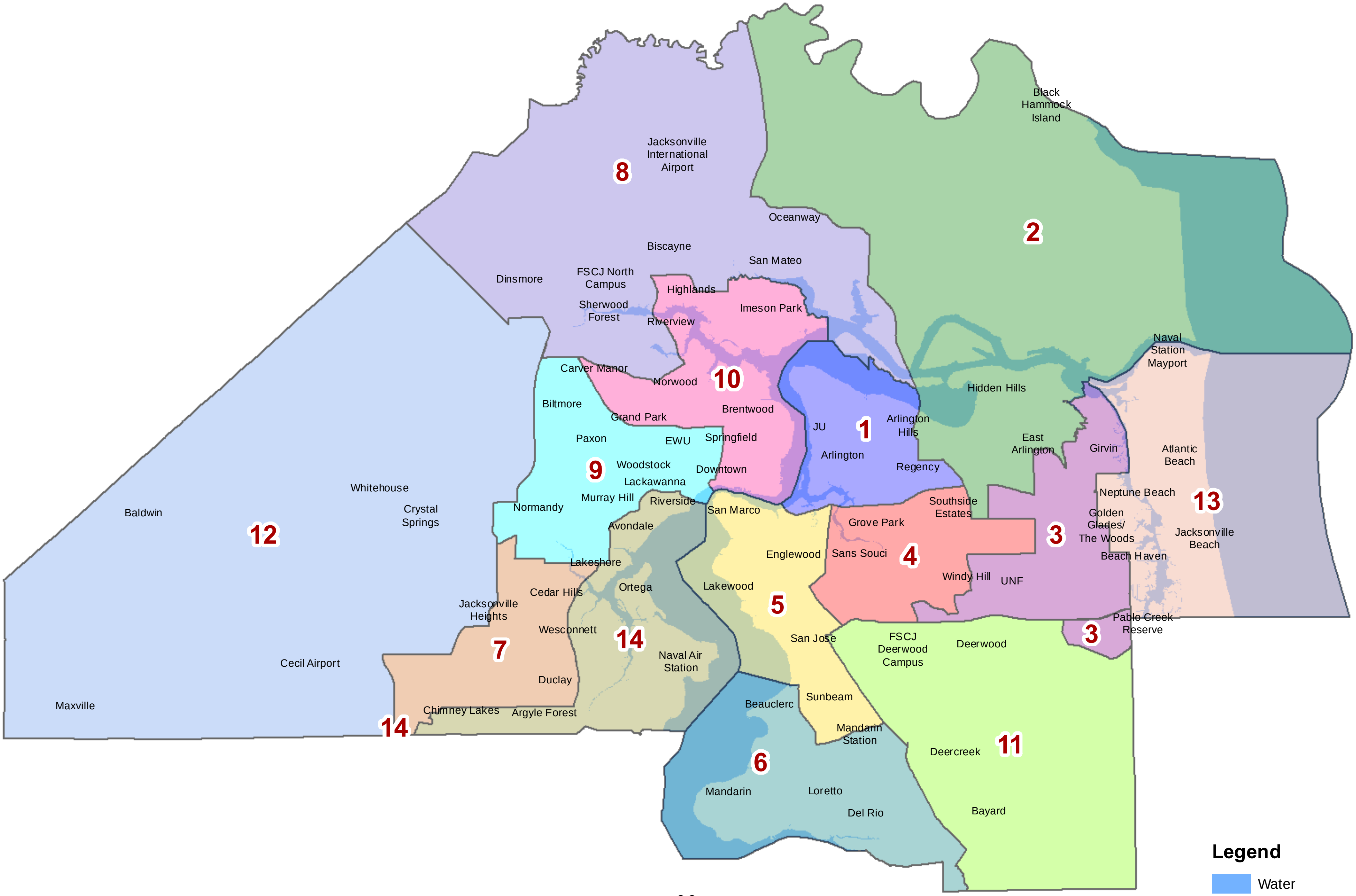
w/Neighborhoods



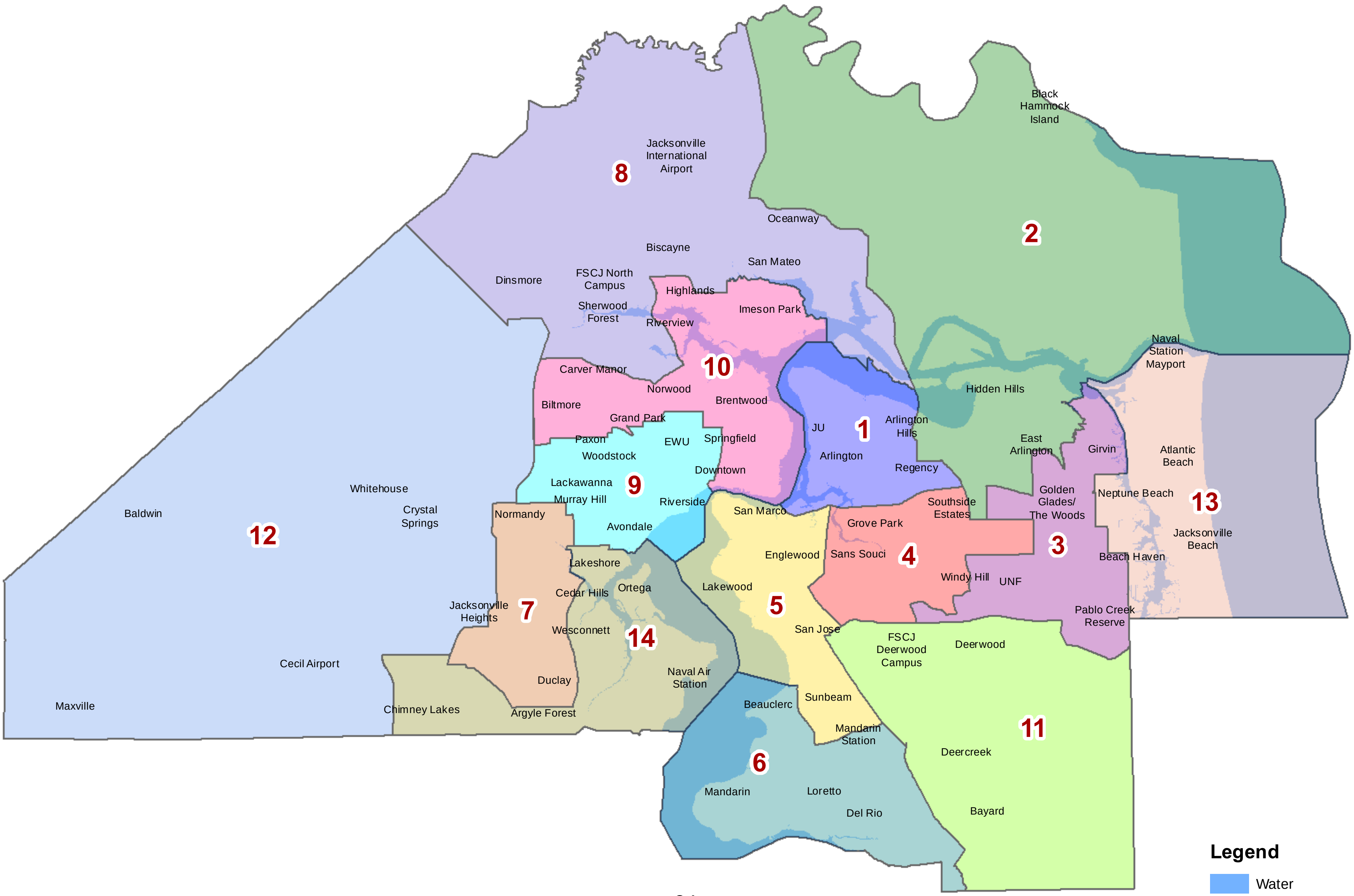
Jacksonville, FL

Maroon IIb Plan

w/Neighborhoods



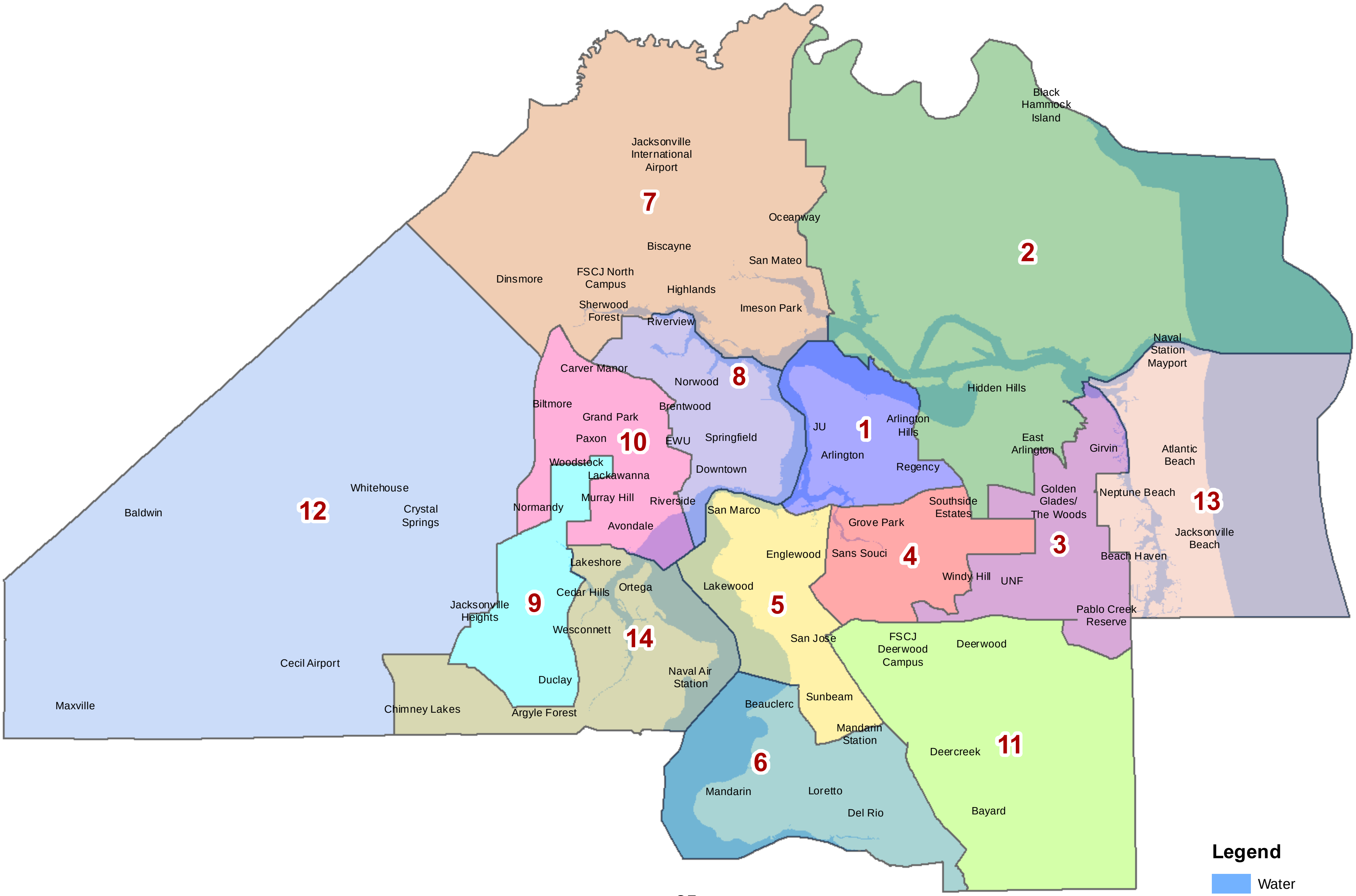
Jacksonville, FL
Maroon IIc Plan
w/Neighborhoods



Jacksonville, FL

Maroon IIIa Plan

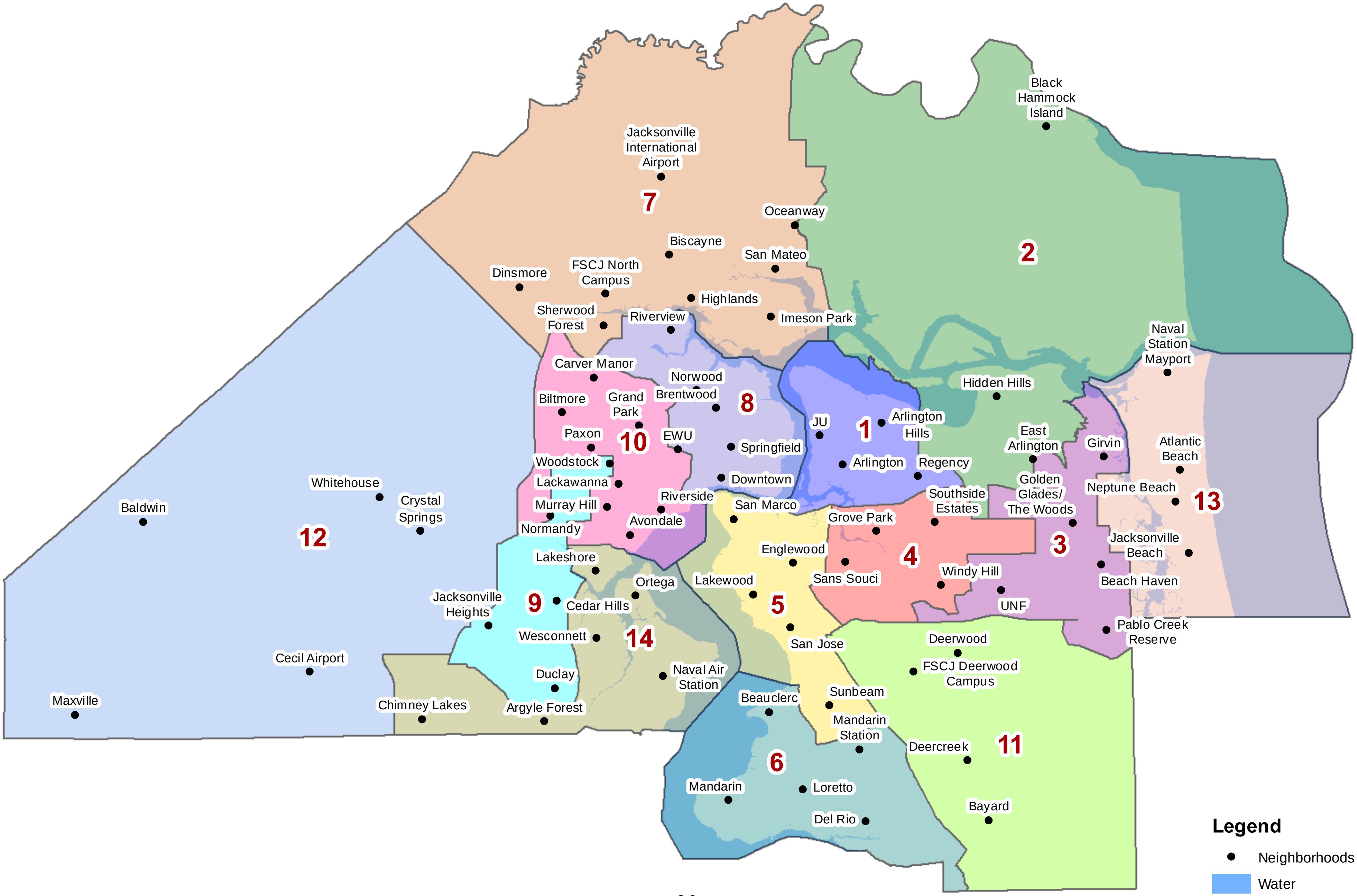
w/Neighborhoods



Jacksonville, FL

Maroon IIIa Fix Plan

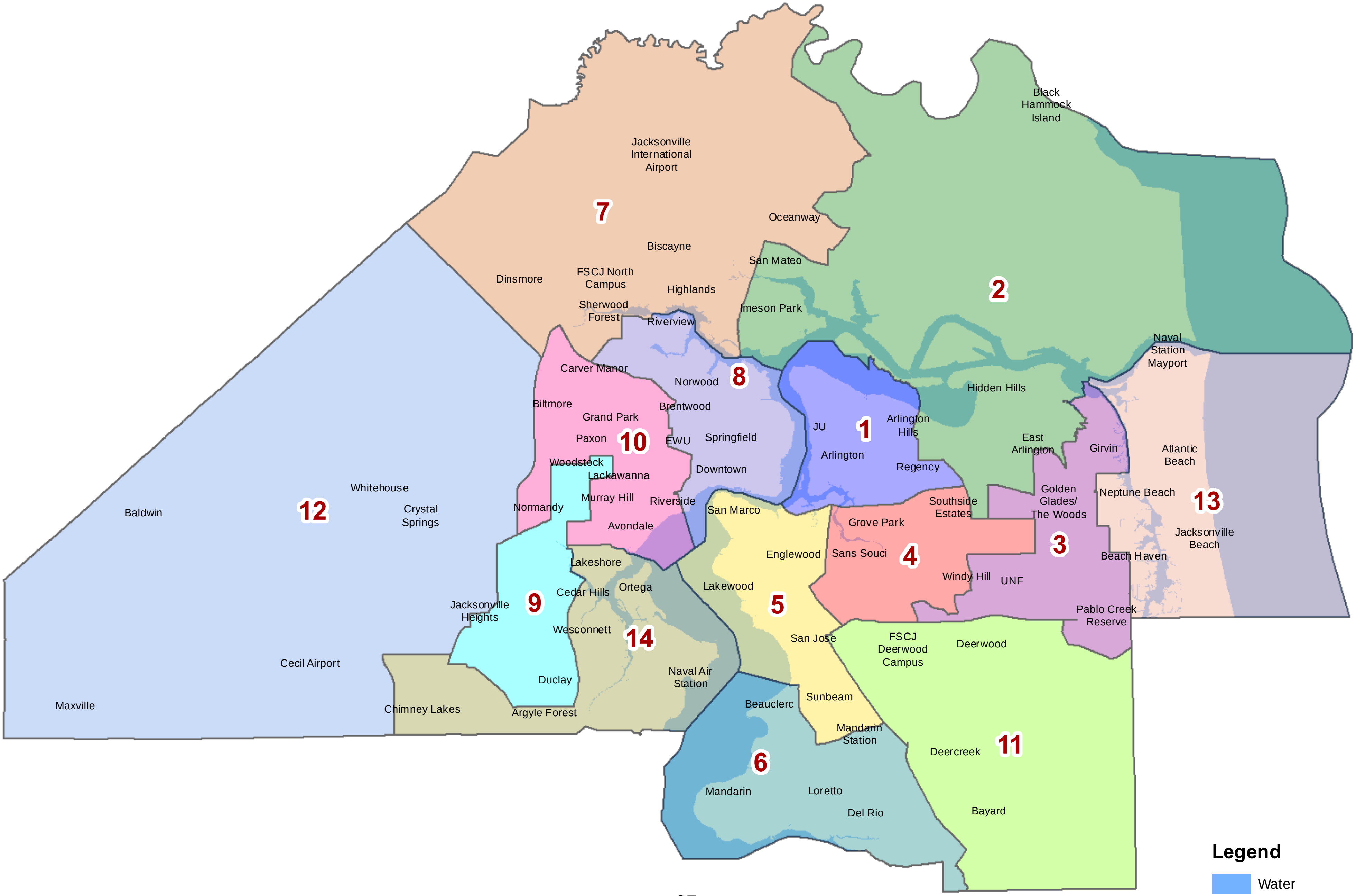
w/Neighborhoods



Jacksonville, FL

Maroon IIIb Plan

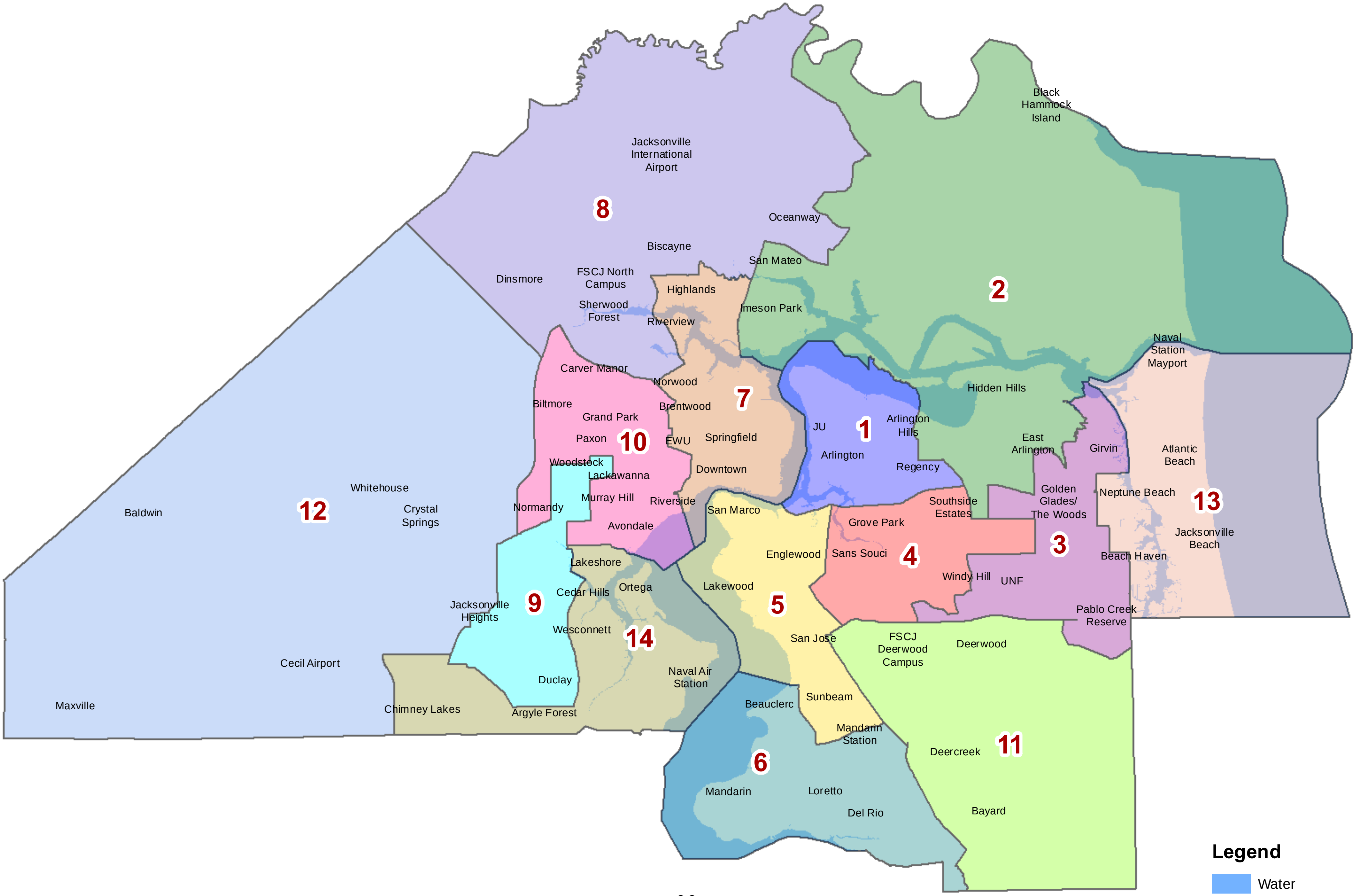
w/Neighborhoods



Jacksonville, FL

Maroon IIIc Plan

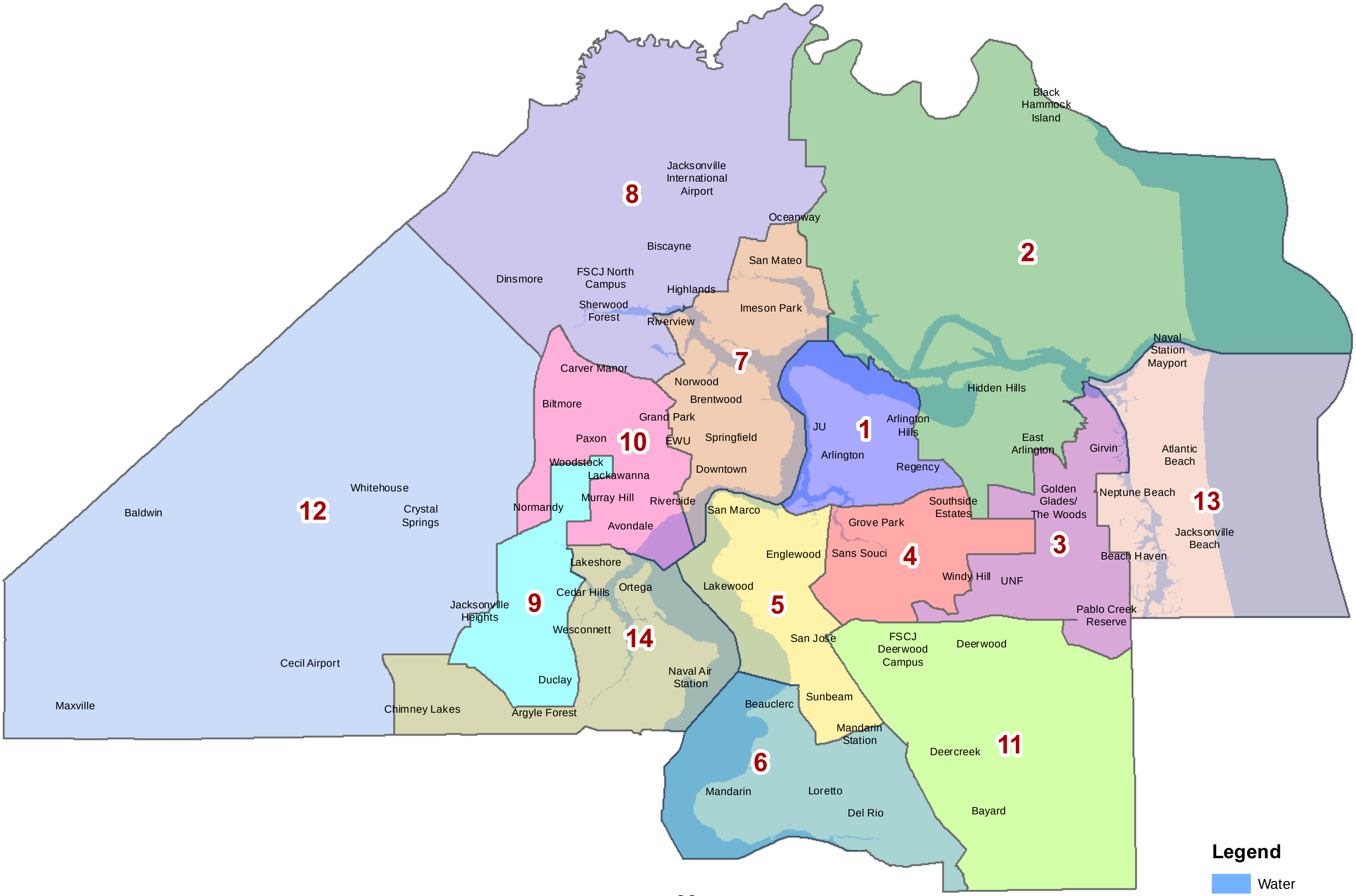
w/Neighborhoods



Jacksonville, FL

Maroon IIId Plan

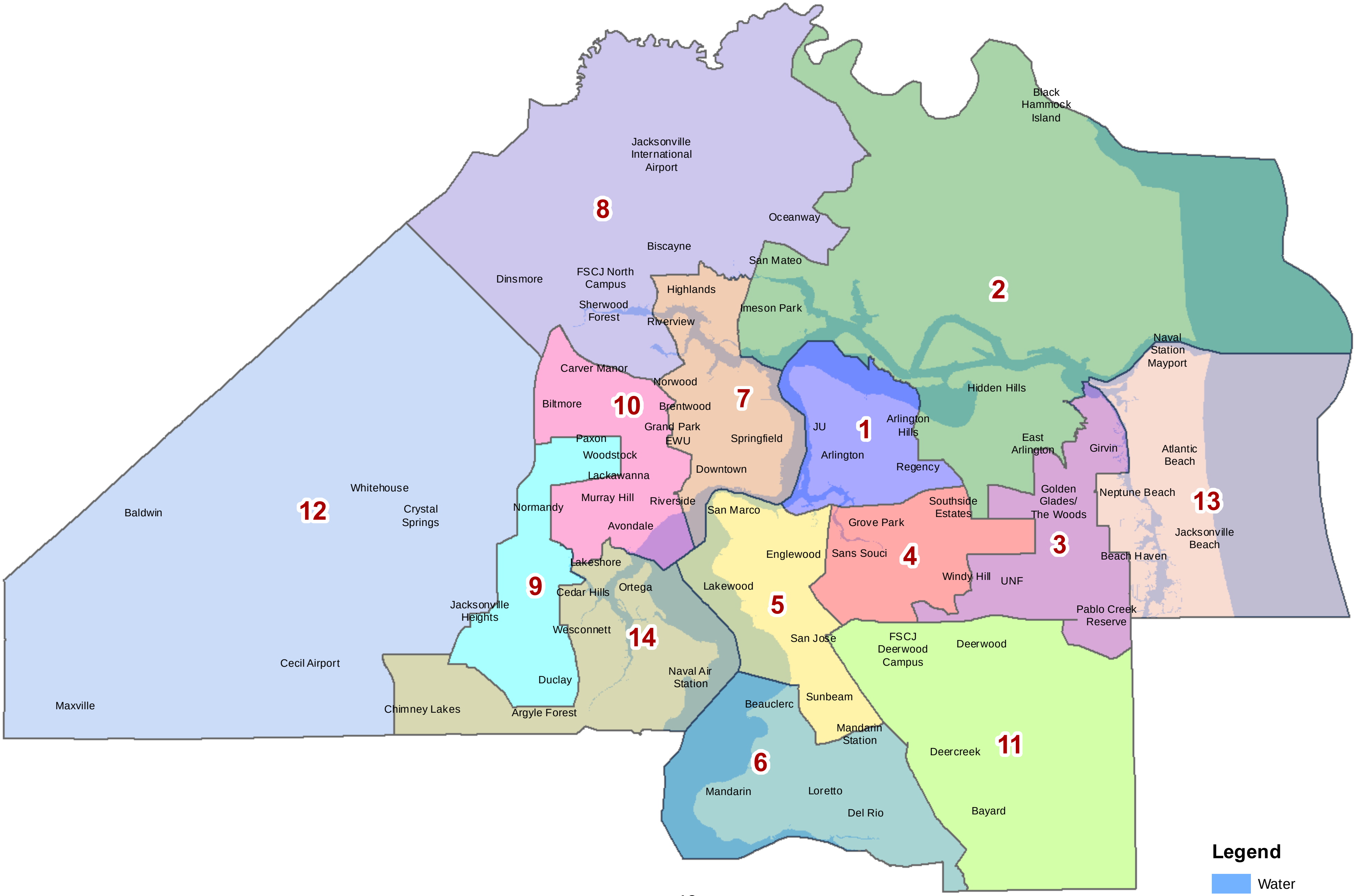
w/Neighborhoods



Jacksonville, FL

Maroon IIIe Plan

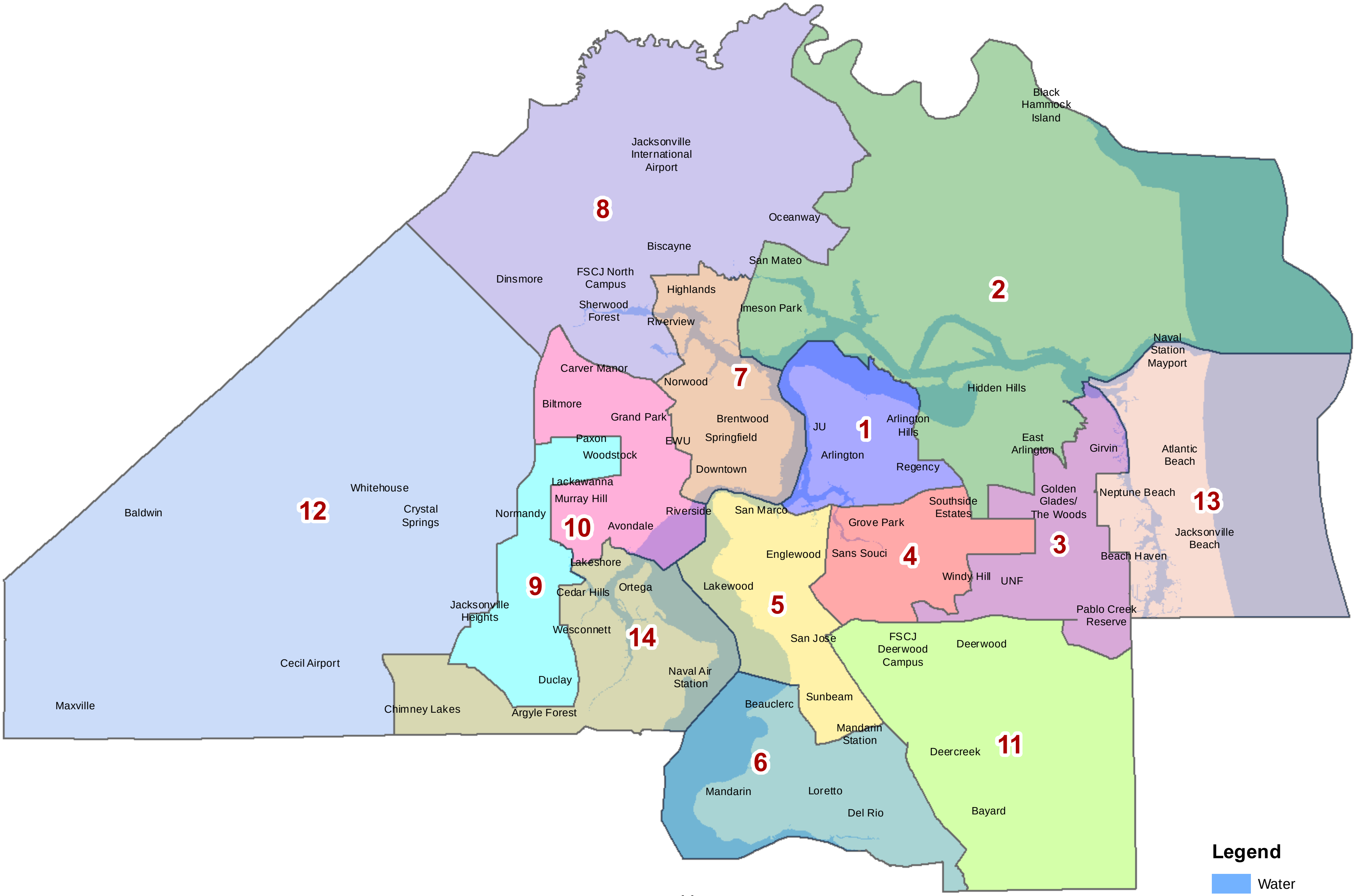
w/Neighborhoods



Jacksonville, FL

Maroon IIIe Fix Plan

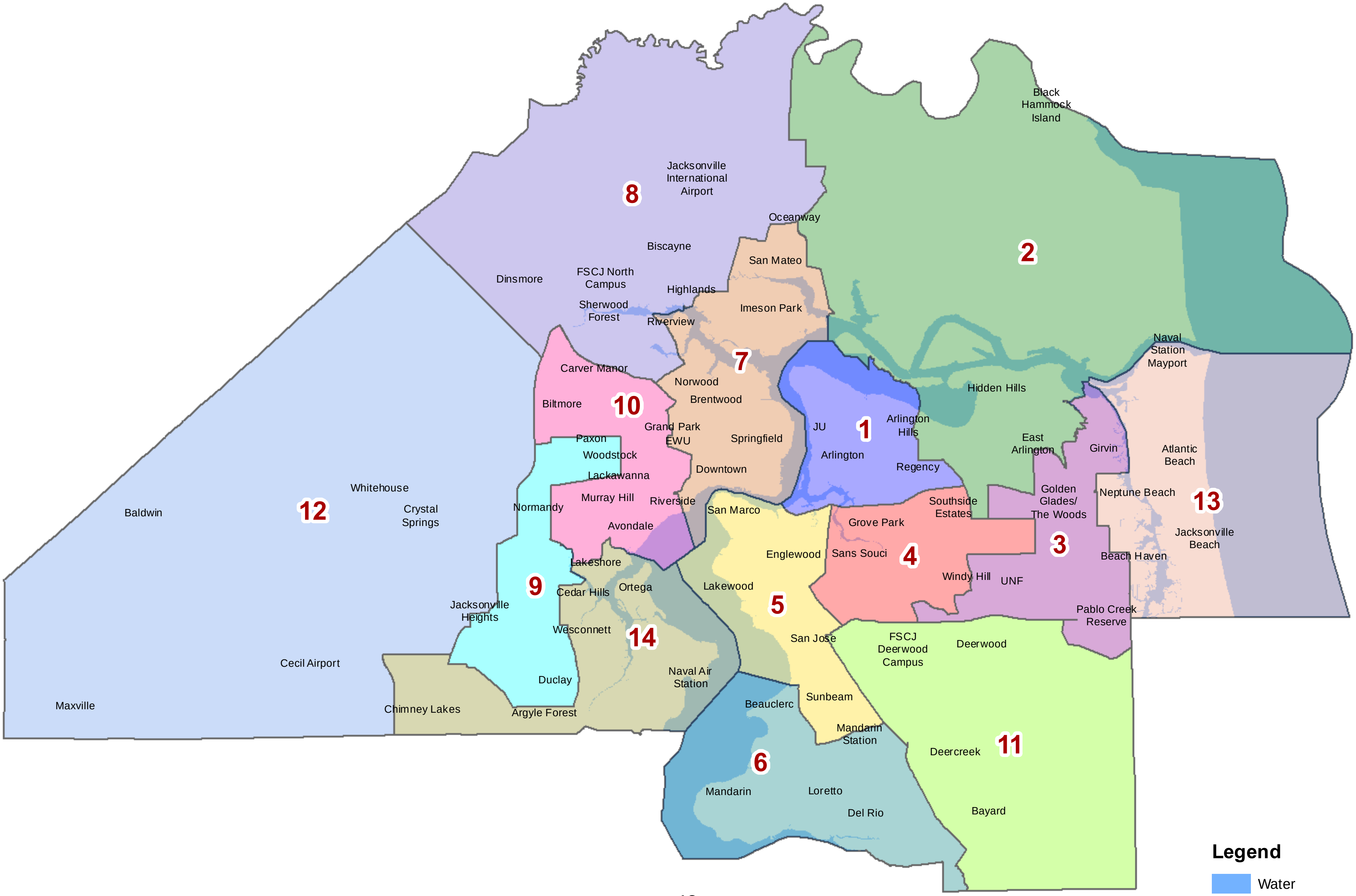
w/Neighborhoods



Jacksonville, FL

Maroon IIIf Plan

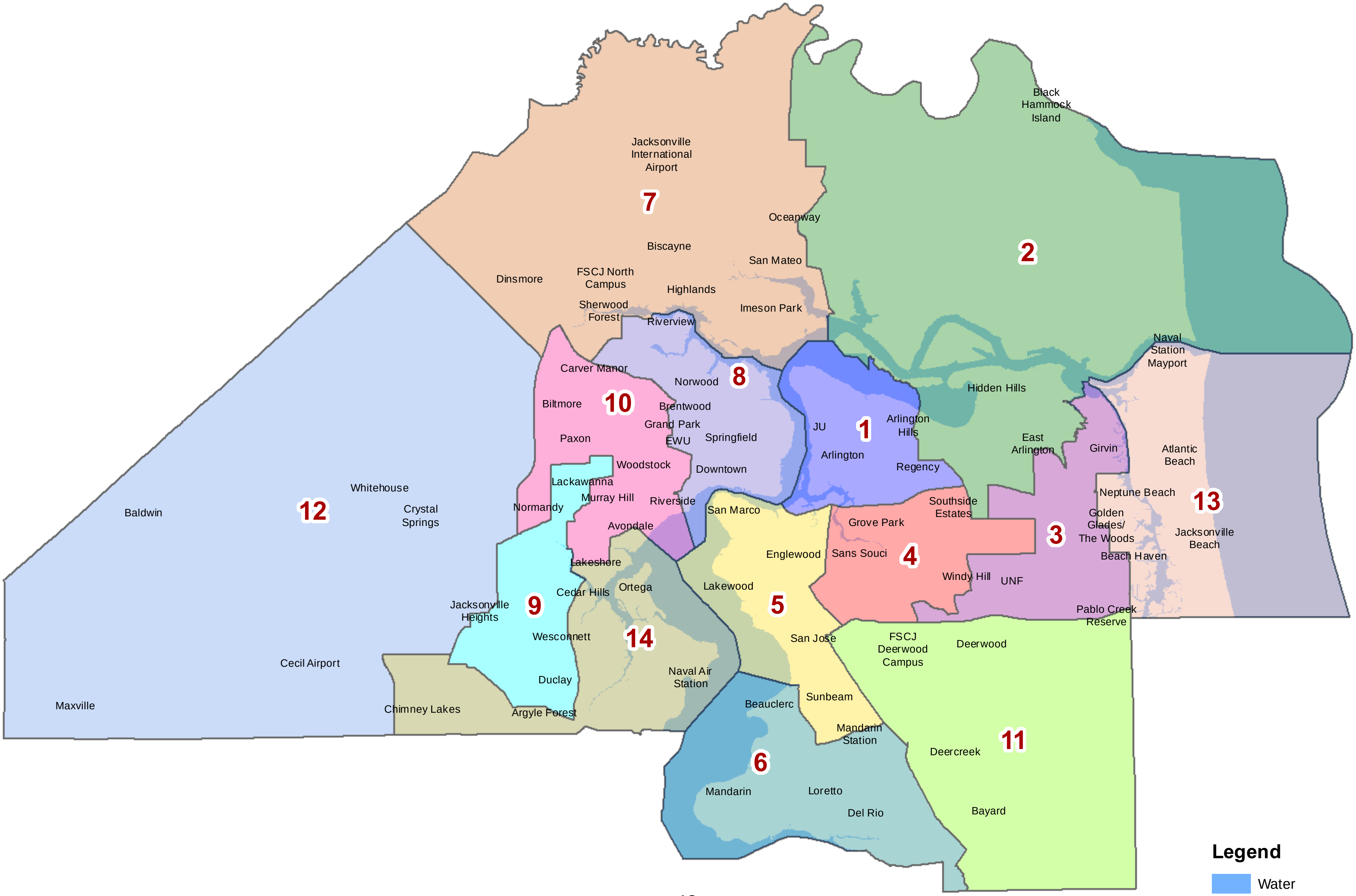
w/Neighborhoods



Jacksonville, FL

Maroon Plan

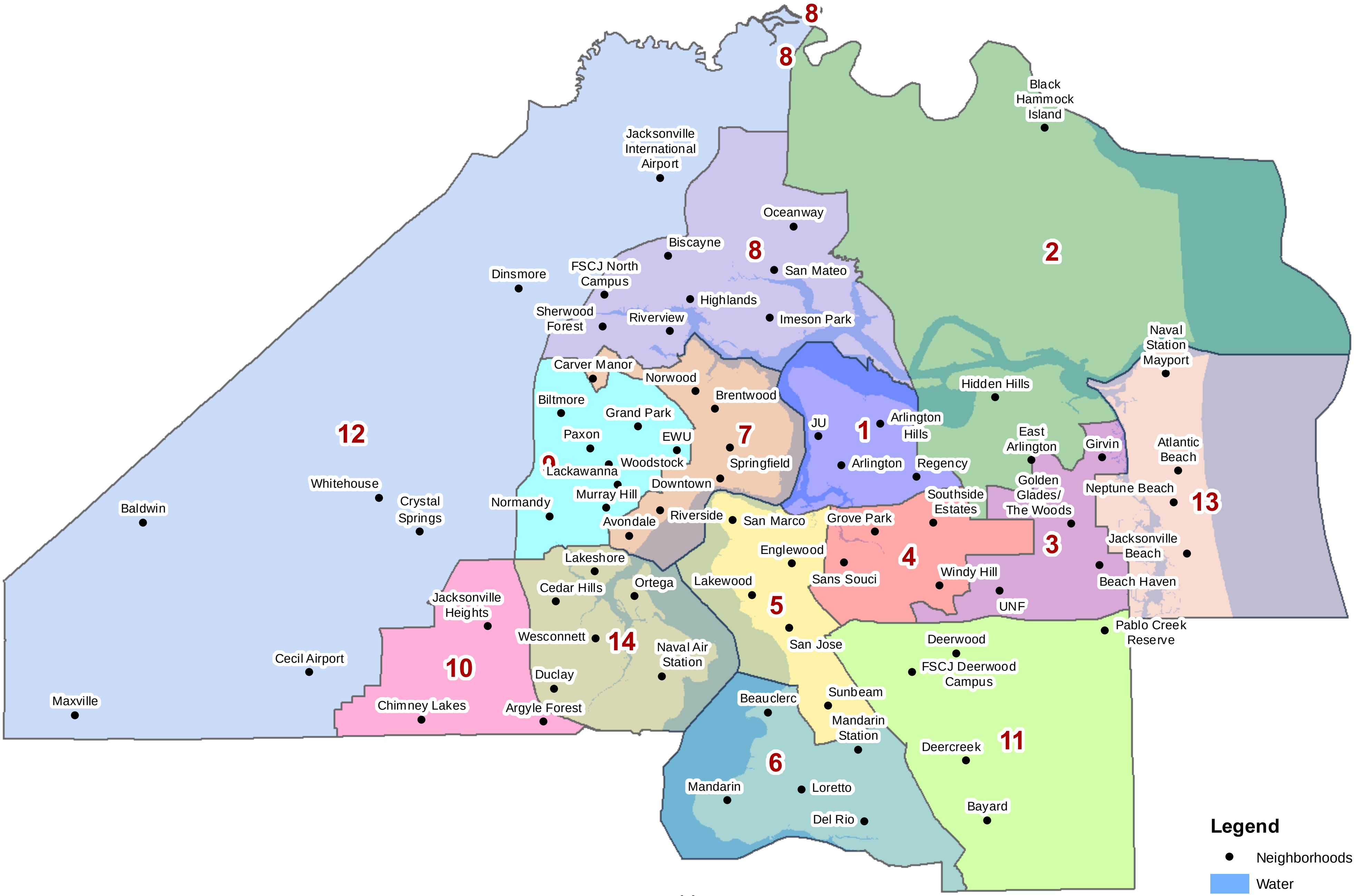
w/Neighborhoods



Jacksonville, FL

Orange Plan

w/Neighborhoods



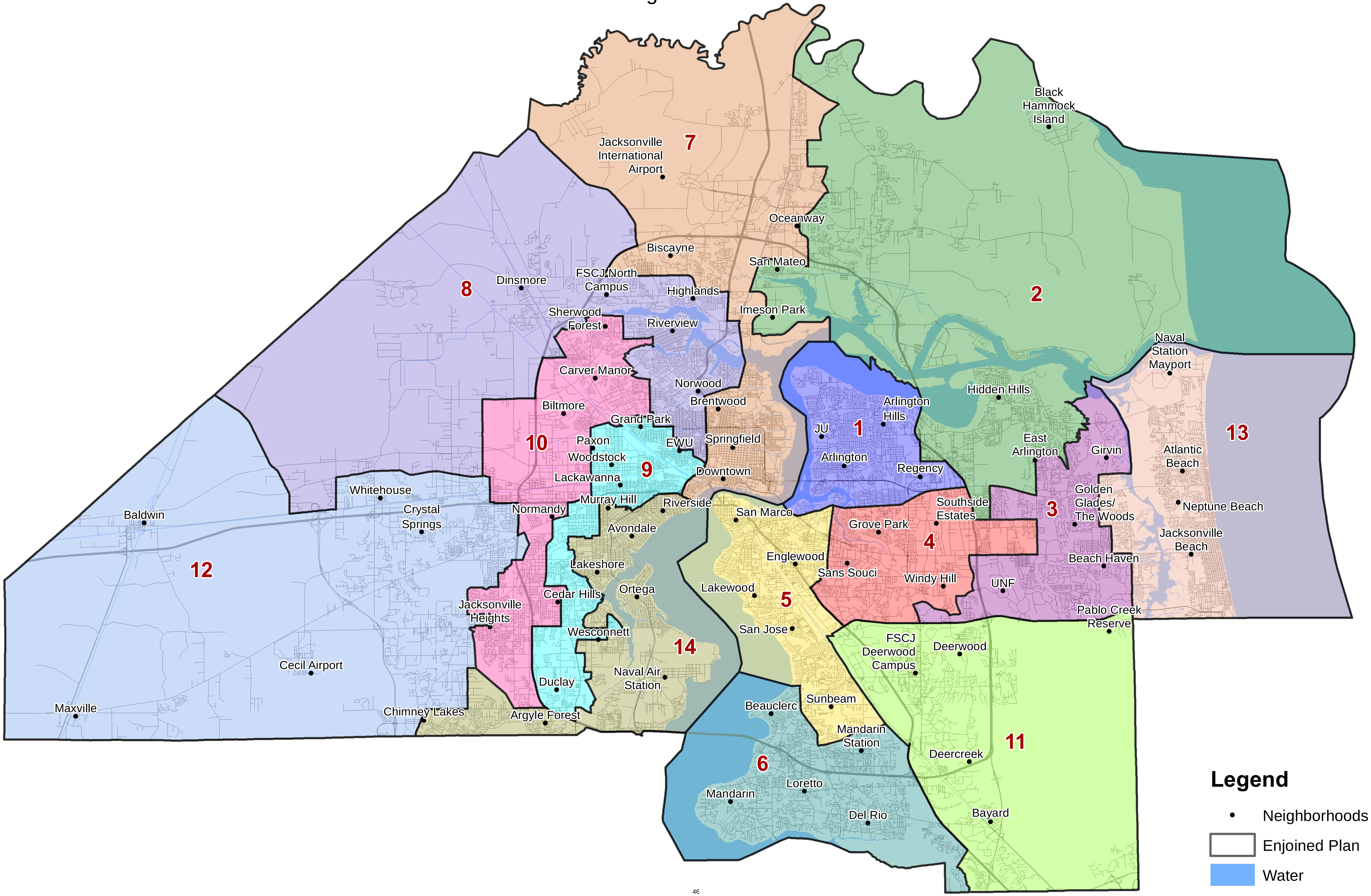
Appendix B2

District Maps of Plans

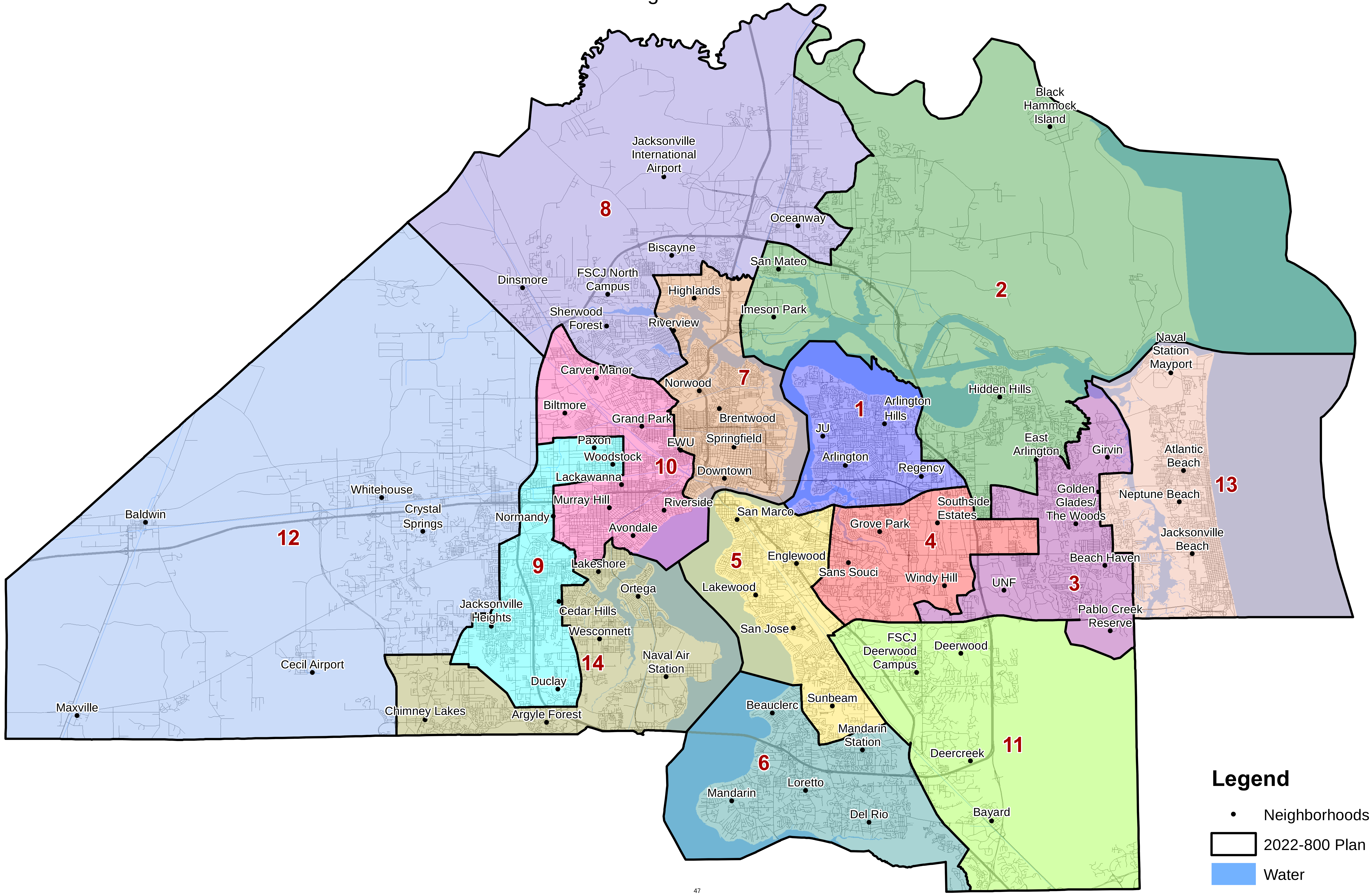
for

Large-size Printing

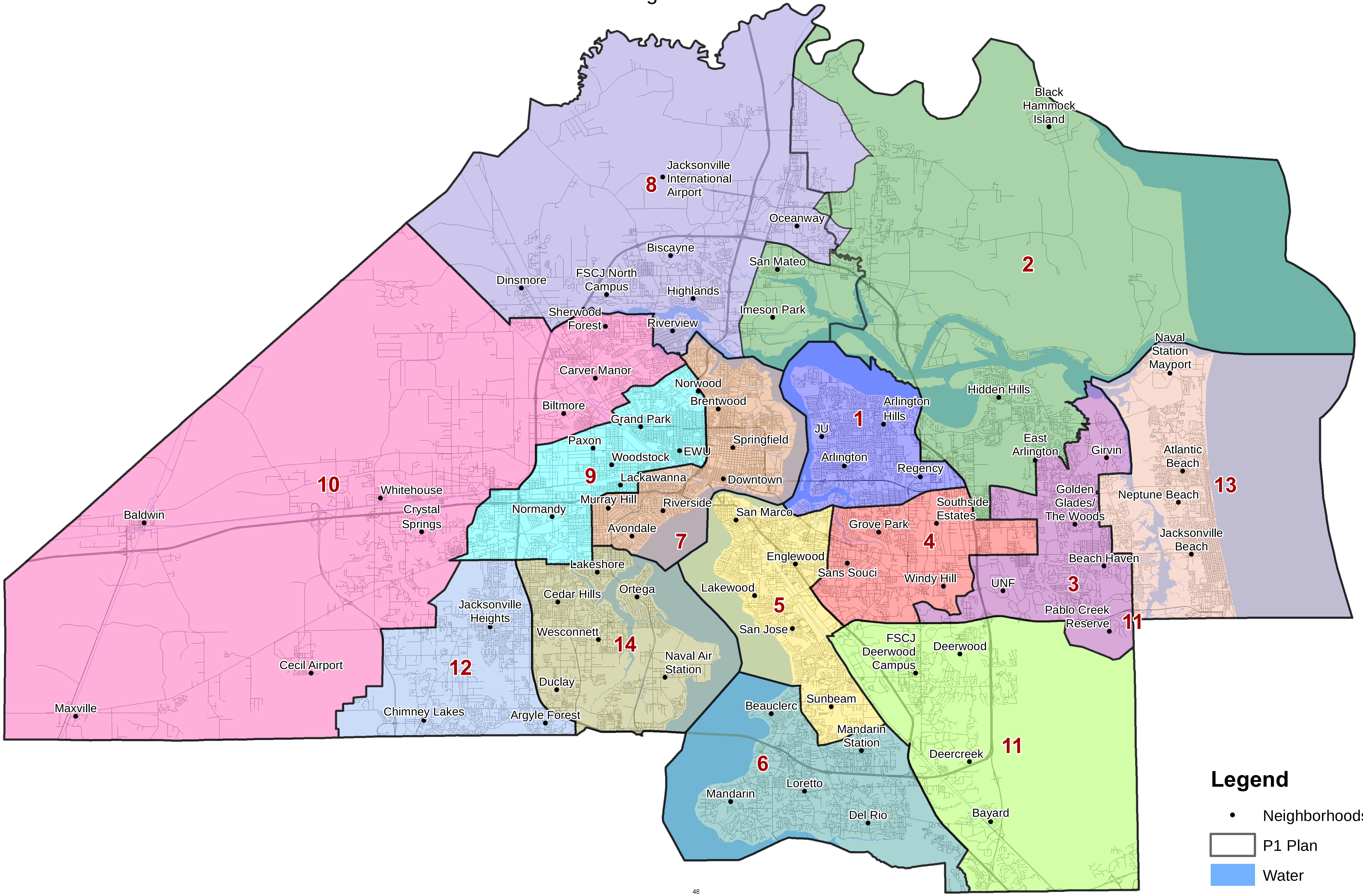
Jacksonville, FL
Enjoined Plan
w/neighborhoods



Jacksonville, FL
2022-800 Plan
w/neighborhoods



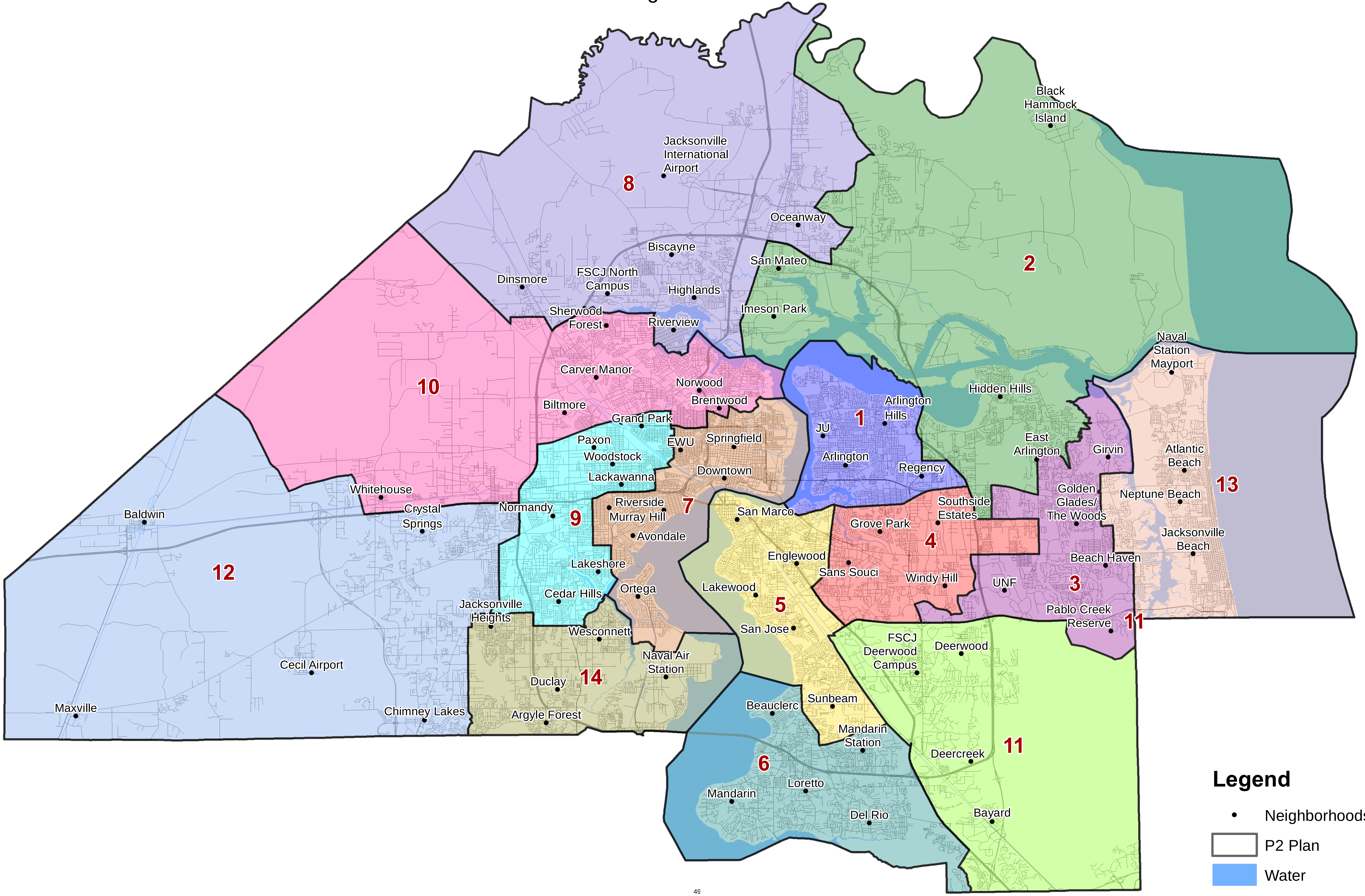
Jacksonville, FL
Plaintiffs' 1 Plan
w/neighborhoods



Jacksonville, FL

Plaintiffs' 2 Plan

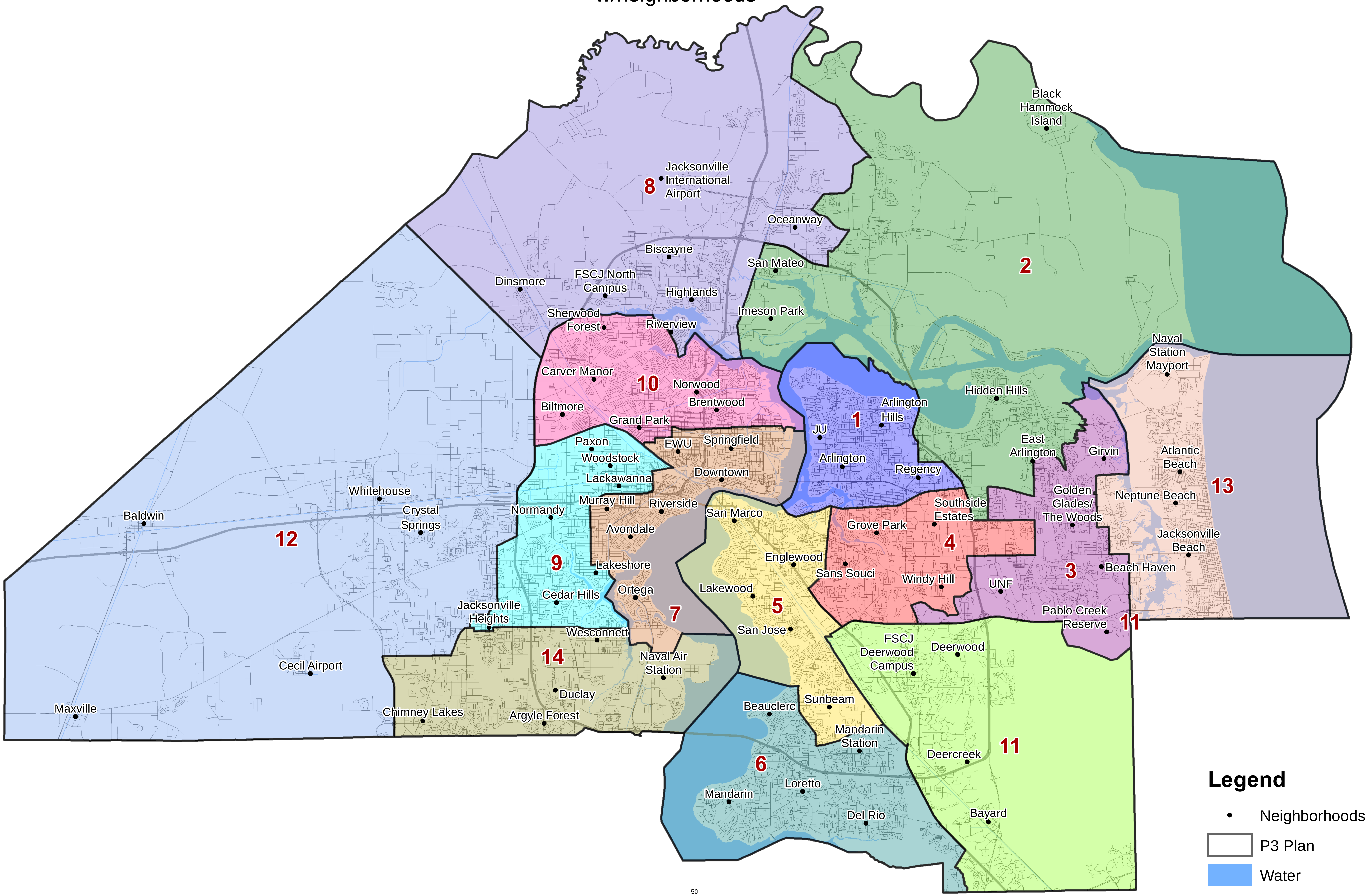
w/neighborhoods



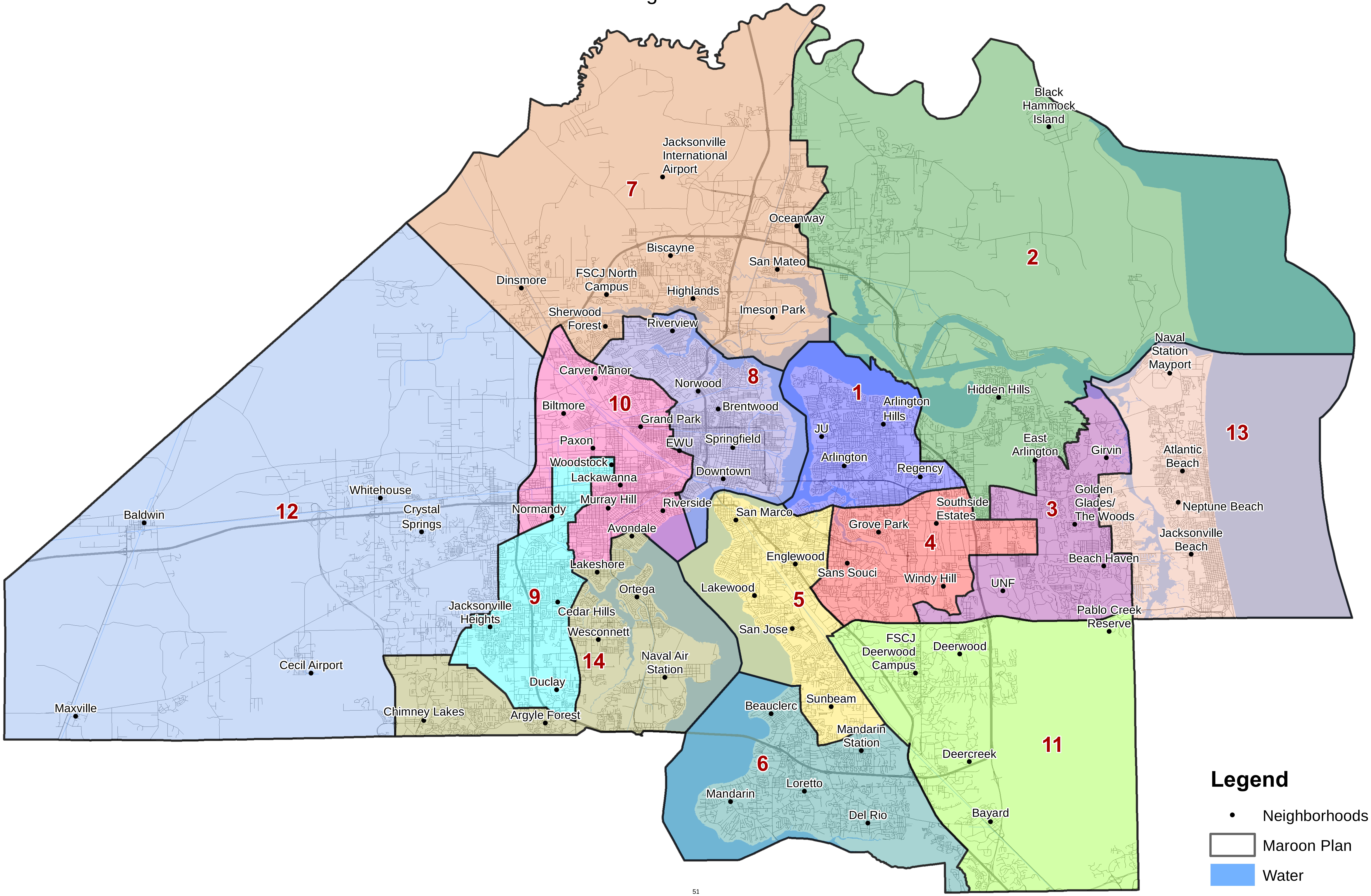
Jacksonville, FL

Plaintiffs' 3 Plan

w/neighborhoods



Jacksonville, FL
Maroon Plan
w/neighborhoods



Appendix B3

Population Deviation Tables

Jacksonville, FL

Enjoined Plan

Population Deviation

District	Population	Deviation	% Deviation
1	72,718	1,606	2.26%
2	72,283	1,171	1.65%
3	73,978	2,866	4.03%
4	71,902	790	1.11%
5	74,201	3,089	4.34%
6	72,247	1,135	1.60%
7	68,060	-3,052	-4.29%
8	67,916	-3,196	-4.49%
9	67,745	-3,367	-4.73%
10	68,777	-2,335	-3.28%
11	73,503	2,391	3.36%
12	67,696	-3,416	-4.80%
13	74,348	3,236	4.55%
14	70,193	-919	-1.29%
Total Dev%			9.35%

Jacksonville, FL

2022-300 Plan

Population Deviation

District	Population	Deviation	% Deviation
1	72,718	1,606	2.26%
2	68,083	-3,029	-4.26%
3	74,659	3,547	4.99%
4	71,923	811	1.14%
5	74,180	3,068	4.31%
6	72,247	1,135	1.60%
7	67,891	-3,221	-4.53%
8	73,252	2,140	3.01%
9	67,801	-3,311	-4.66%
10	69,544	-1,568	-2.20%
11	72,822	1,710	2.40%
12	67,585	-3,527	-4.96%
13	74,348	3,236	4.55%
14	68,514	-2,598	-3.65%
Total Dev%			9.95%

Jacksonville, FL

Plantiff's Plan

Population Deviation

District	Population	Deviation	% Deviation
1	72,718	1,606	2.26%
2	68,266	-2,846	-4.00%
3	74,659	3,547	4.99%
4	71,923	811	1.14%
5	74,180	3,068	4.31%
6	72,247	1,135	1.60%
7	68,007	-3,105	-4.37%
8	68,698	-2,414	-3.39%
9	68,150	-2,962	-4.17%
10	72,532	1,420	2.00%
11	72,822	1,710	2.40%
12	67,840	-3,272	-4.60%
13	74,348	3,236	4.55%
14	69,177	-1,935	-2.72%
Total Dev%			9.59%

Jacksonville, FL

Plaintiff's 2 Plan

Population Deviation

District	Population	Deviation	% Deviation
1	72,718	1,606	2.26%
2	68,083	-3,029	-4.26%
3	74,659	3,547	4.99%
4	71,923	811	1.14%
5	74,180	3,068	4.31%
6	72,247	1,135	1.60%
7	70,007	-1,105	-1.55%
8	68,881	-2,231	-3.14%
9	68,190	-2,922	-4.11%
10	70,028	-1,084	-1.52%
11	72,822	1,710	2.40%
12	68,895	-2,217	-3.12%
13	74,348	3,236	4.55%
14	68,586	-2,526	-3.55%
Total Dev%			9.25%

Jacksonville, FL
Plaintiff's 3 Plan
Population Deviation

District	Population	Deviation	% Deviation
1	72,718	1,606	2.26%
2	68,083	-3,029	-4.26%
3	74,659	3,547	4.99%
4	71,923	811	1.14%
5	74,180	3,068	4.31%
6	72,247	1,135	1.60%
7	68,237	-2,875	-4.04%
8	67,903	-3,209	-4.51%
9	68,590	-2,522	-3.55%
10	67,700	-3,412	-4.80%
11	72,822	1,710	2.40%
12	67,585	-3,527	-4.96%
13	74,348	3,236	4.55%
14	74,572	3,460	4.87%
Total Dev%			9.95%

Appendix B4

Compactness Measure Tables

Jacksonville, FL

Enjoined Plan

Compactness Measurements

District	Reock	Polsby-Popper	Area/Convex Hull
2	0.49	0.28	0.75
7	0.30	0.18	0.62
8	0.49	0.31	0.73
9	0.19	0.15	0.54
10	0.20	0.19	0.61
12	0.55	0.56	0.90
14	0.32	0.22	0.64
Mean	0.39	0.37	0.74

Jacksonville, FL

2022-800 Plan

Compactness Measurements

District	Reock	Polsby-Popper	Area/Convex Hull
2	0.49	0.27	0.73
7	0.39	0.41	0.79
8	0.54	0.31	0.81
9	0.27	0.31	0.67
10	0.39	0.34	0.77
12	0.50	0.69	0.97
14	0.39	0.33	0.69
Mean	0.42	0.42	0.78

Jacksonville, FL

Plaintiffs' Plan

Compactness Measurements

District	Reock	Polsby-Popper	Area/Convex Hull
2	0.46	0.29	0.79
7	0.42	0.39	0.68
8	0.53	0.33	0.83
9	0.30	0.39	0.76
10	0.40	0.50	0.89
12	0.46	0.51	0.83
14	0.65	0.72	0.93
Mean	0.44	0.46	0.80

Jacksonville, FL

Plaintiffs' Plan

Compactness Measurements

District	Reock	Polsby-Popper	Area/Convex Hull
2	0.49	0.27	0.73
7	0.36	0.32	0.67
8	0.55	0.33	0.82
9	0.36	0.42	0.81
10	0.37	0.41	0.81
12	0.53	0.64	0.90
14	0.47	0.50	0.85
Mean	0.44	0.44	0.79

Jacksonville, FL

Plaintiffs' Plan

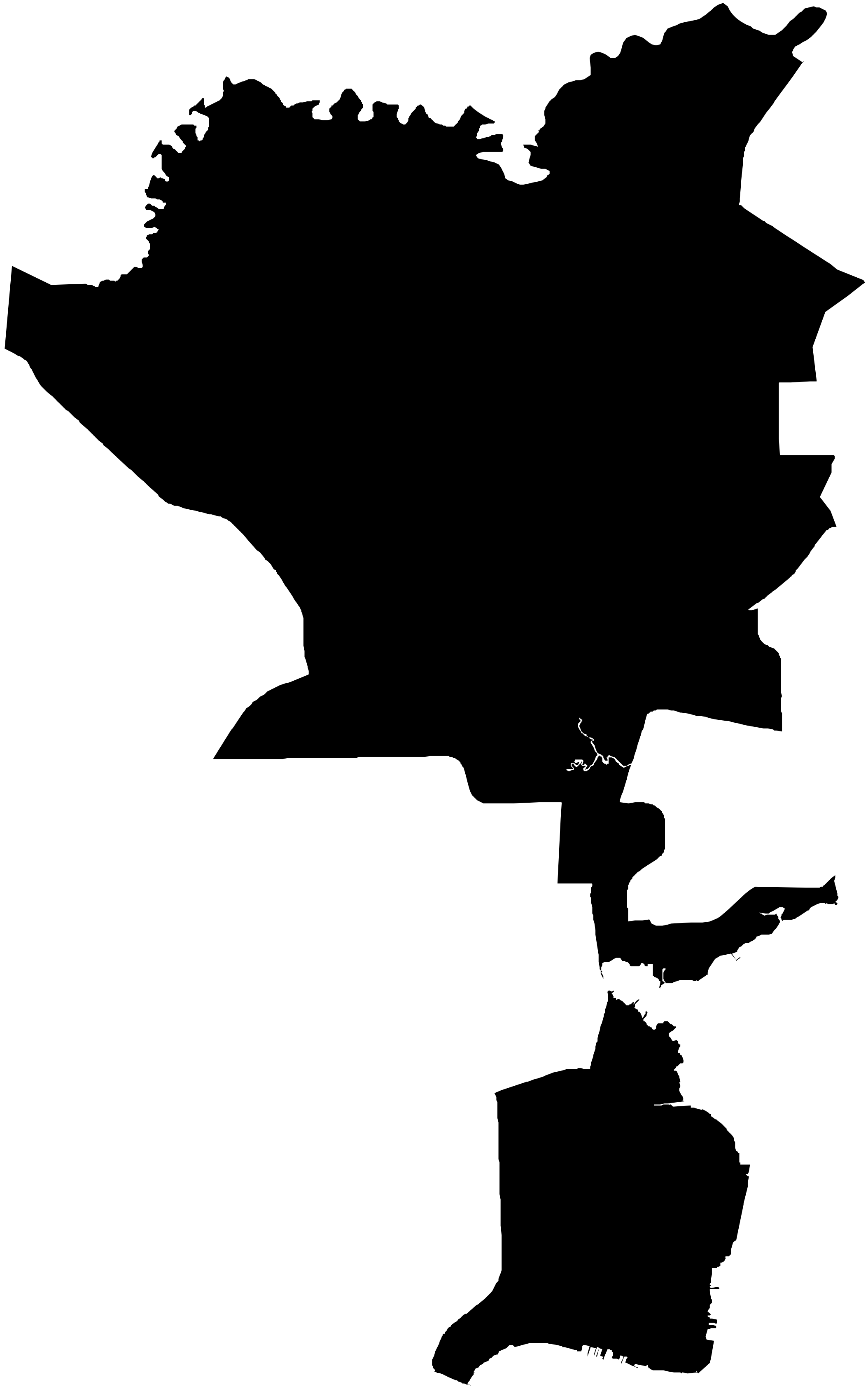
Compactness Measurements

District	Reock	Polsby-Popper	Area/Convex Hull
2	0.49	0.27	0.73
7	0.39	0.33	0.67
8	0.55	0.33	0.81
9	0.40	0.40	0.71
10	0.44	0.48	0.85
12	0.50	0.69	0.97
14	0.36	0.51	0.92
Mean	0.44	0.45	0.80

Appendix B5

Maps of District Silhouettes

Jacksonville, FL
Enjoined Plan
District 7



Jacksonville, FL
Enjoined Plan
District 8

Jacksonville, FL

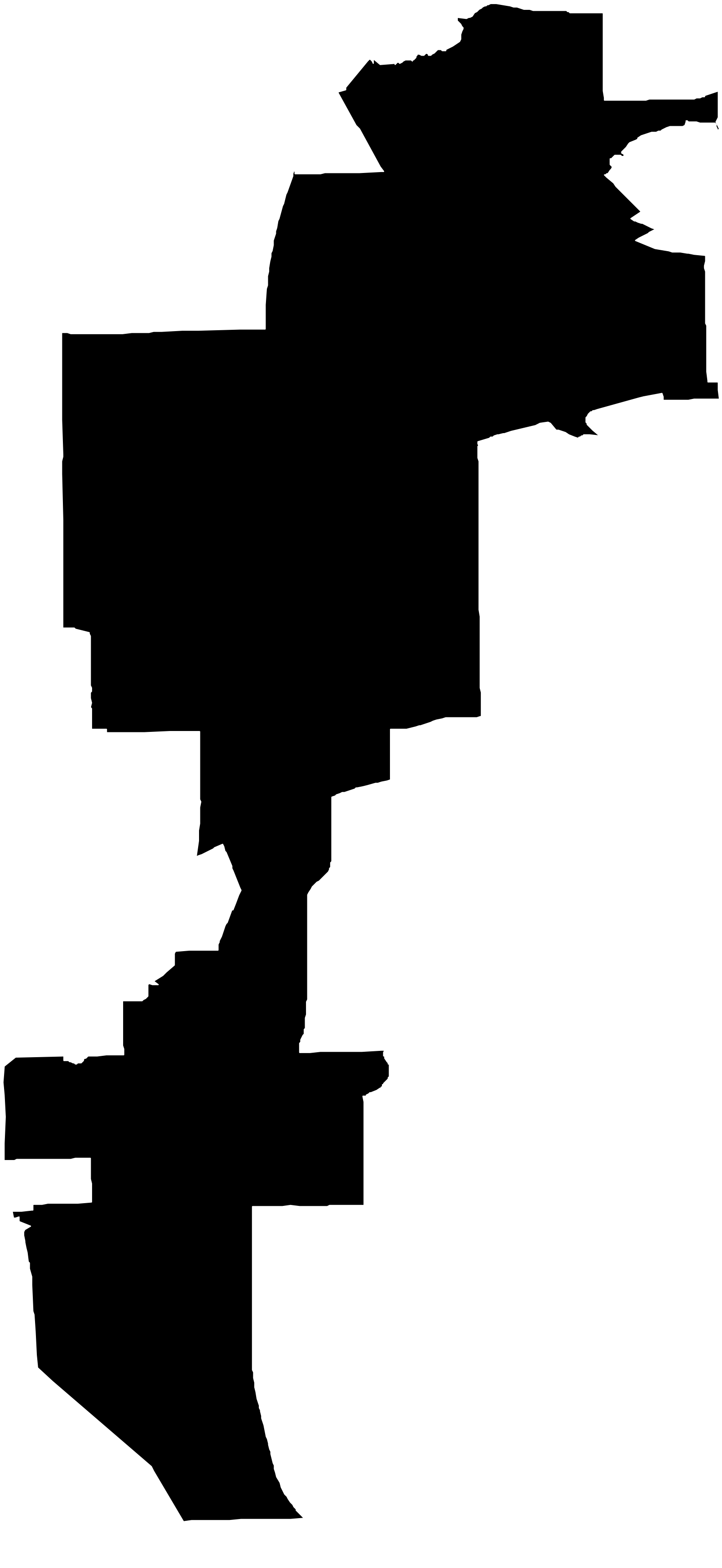
Enjoined Plan

District 9

Jacksonville, FL

Enjoined Plan

District 10

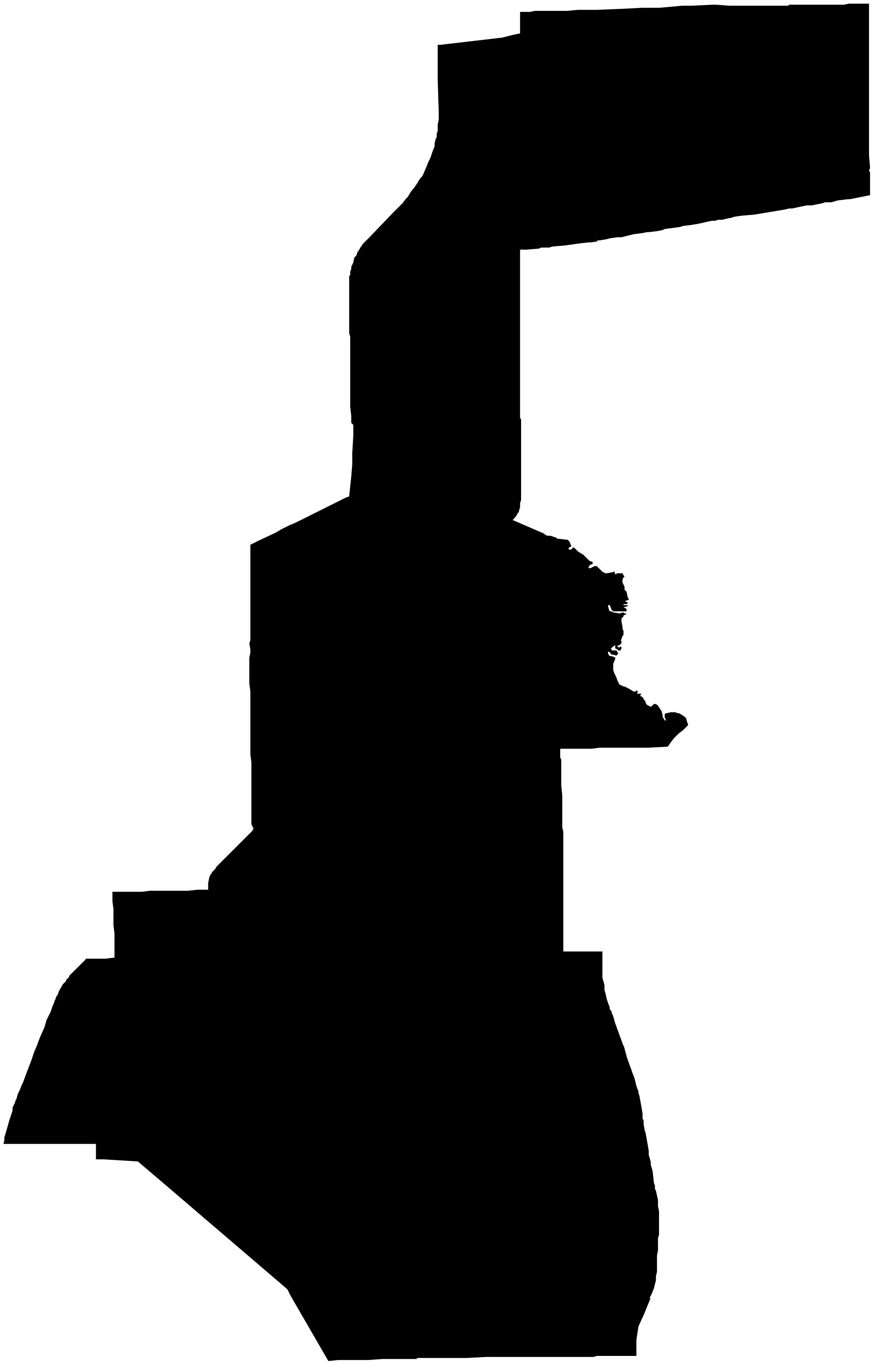


Jacksonville, FL
Enjoined Plan
District 14

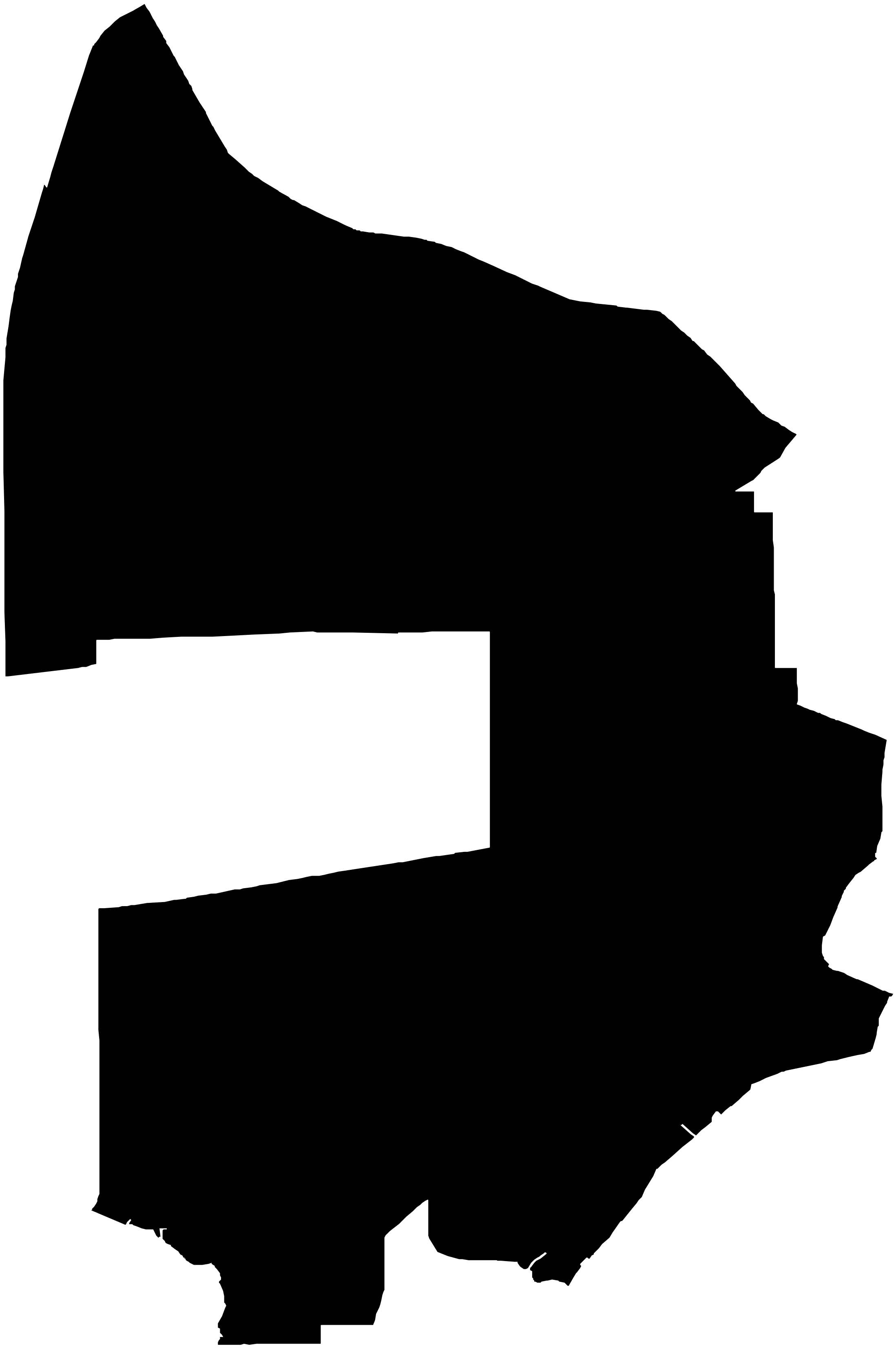
Jacksonville, FL
2022-800 Plan
District 7

Jacksonville, FL
2022-800 Plan
District 8

Jacksonville, FL
2022-800 Plan
District 9



Jacksonville, FL
2022-800 Plan
District 10



Jacksonville, FL
2022-800 Plan
District 14

Jacksonville, FL

Plaintiffs' 1 Plan

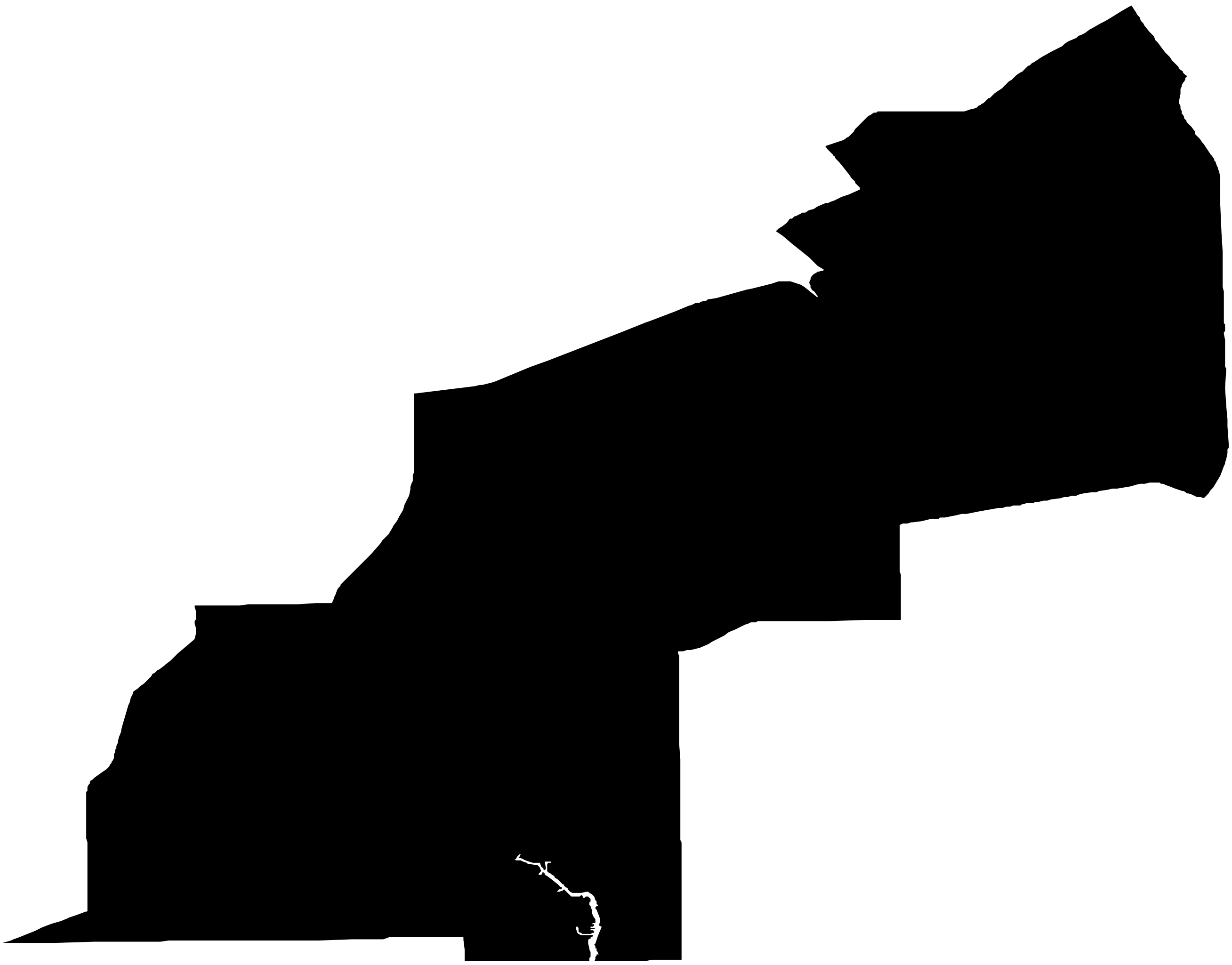
District 7

Jacksonville, FL

Plaintiffs' 1 Plan

District 8

Jacksonville, FL
Plaintiffs' 1 Plan
District 9



Jacksonville, FL
Plaintiffs' 1 Plan
District 10

Jacksonville, FL

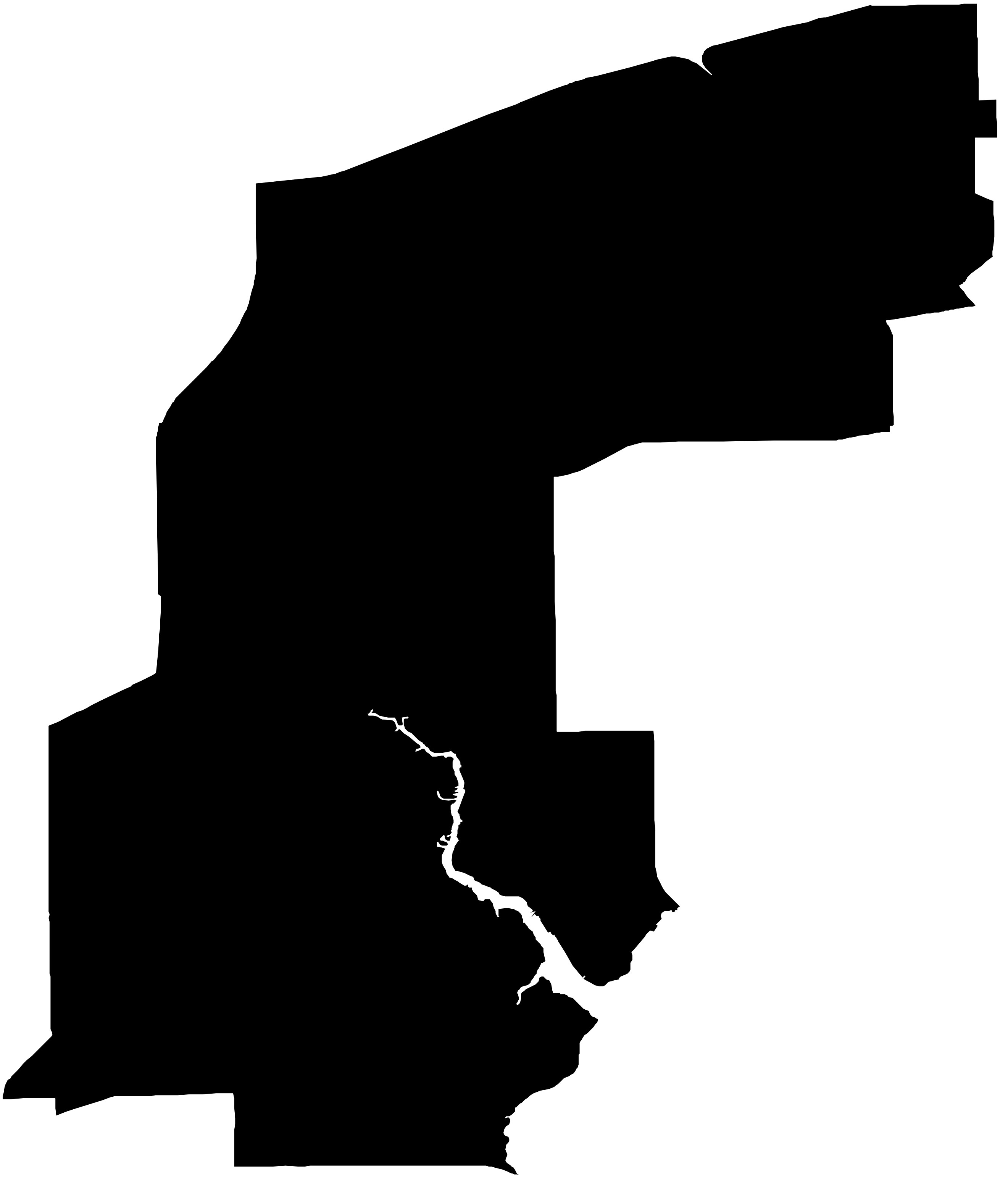
Plaintiffs' 1 Plan

District 14

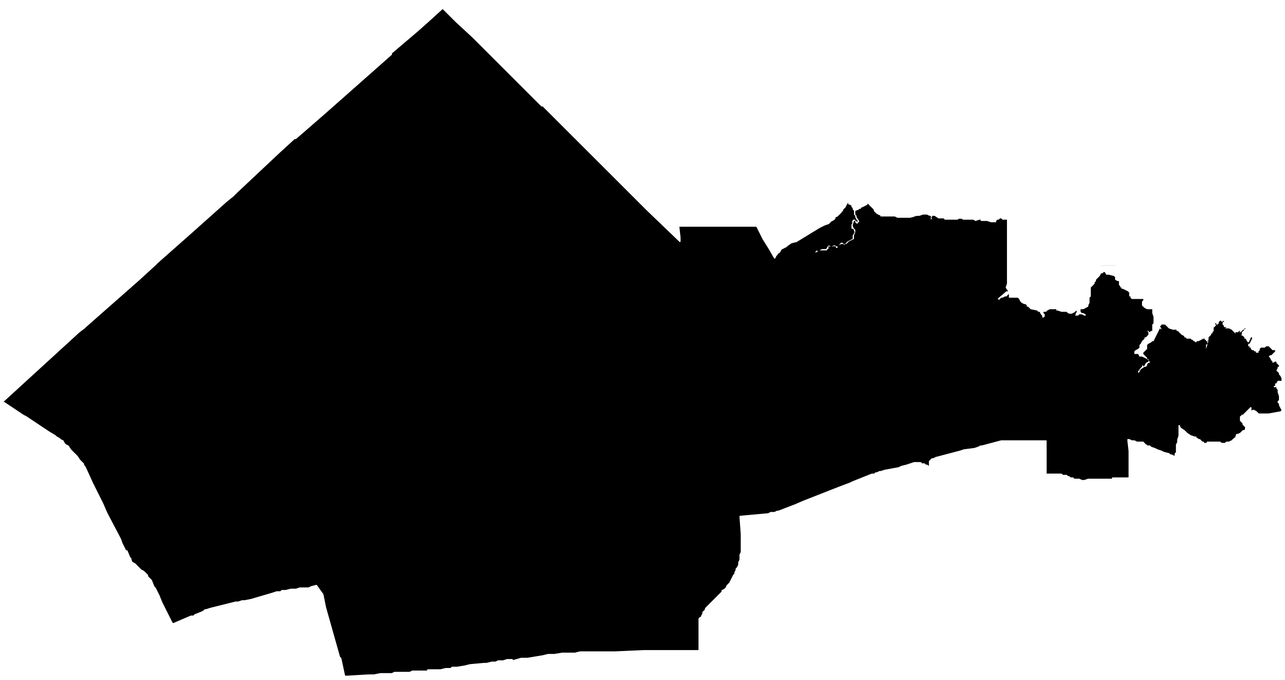
Jacksonville, FL
Plaintiffs' 2 Plan
District 7

Jacksonville, FL
Plaintiffs' 2 Plan
District 8

Jacksonville, FL
Plaintiffs' 2 Plan
District 9



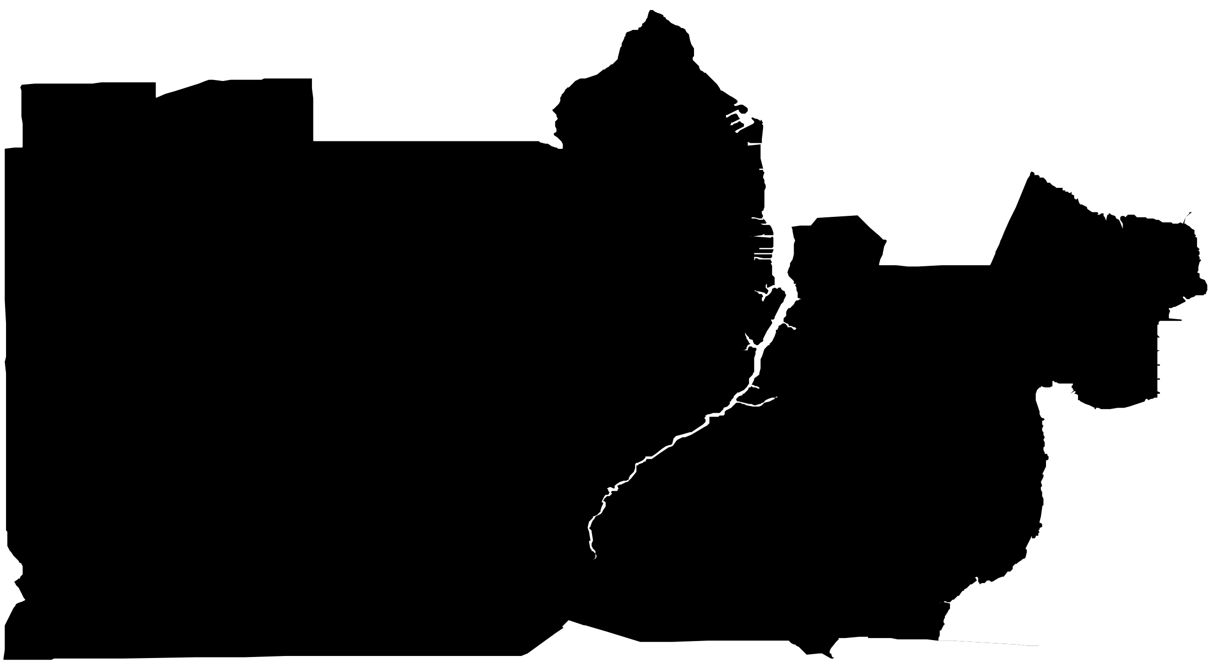
Jacksonville, FL
Plaintiffs' 2 Plan
District 10



Jacksonville, FL

Plaintiffs' 2 Plan

District 14



Jacksonville, FL

Plaintiffs' 3 Plan

District 7

Jacksonville, FL

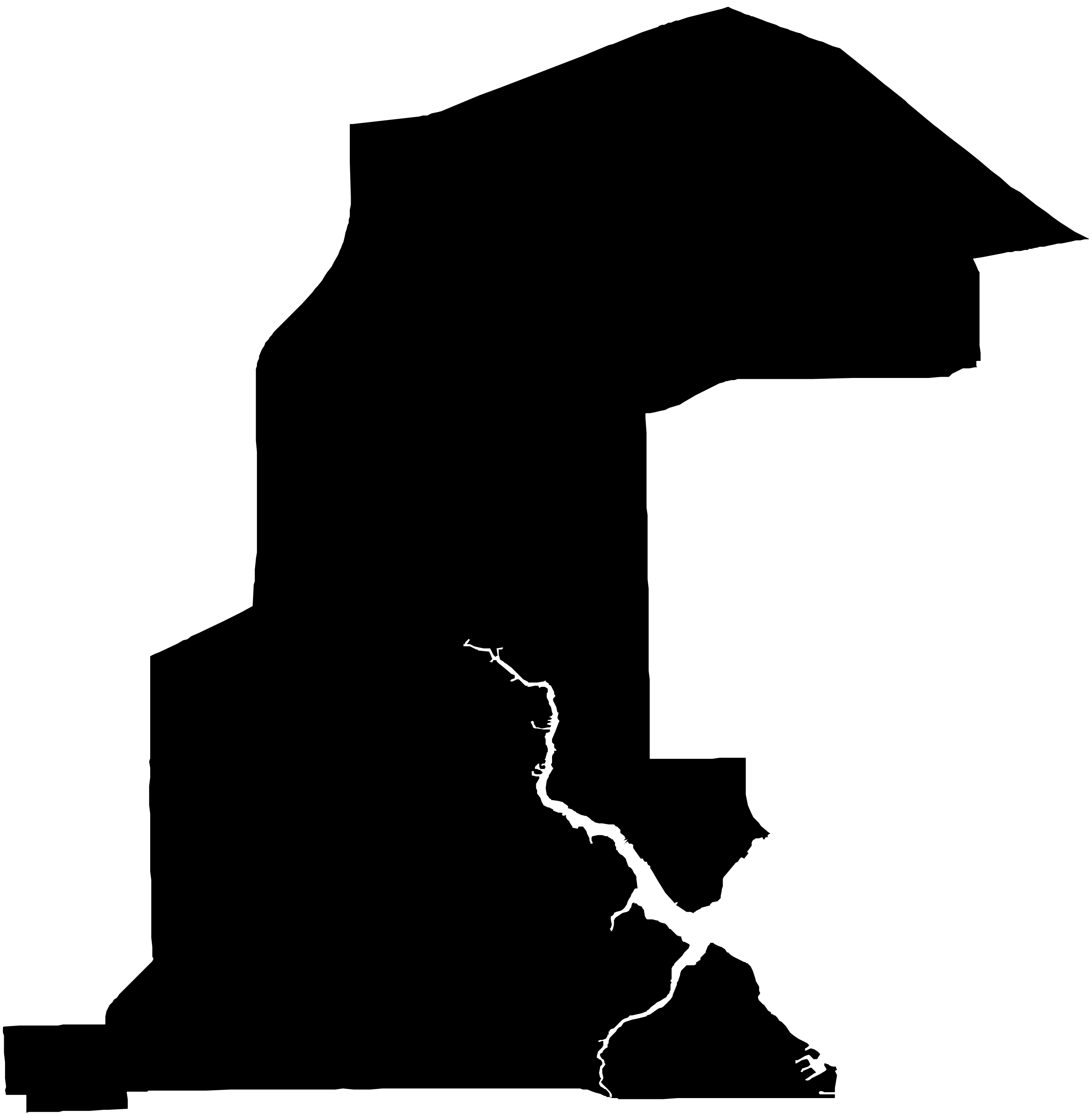
Plaintiffs' 3 Plan

District 8

Jacksonville, FL

Plaintiffs' 3 Plan

District 9



Jacksonville, FL

Plaintiffs' 3 Plan

District 10

Jacksonville, FL

Plaintiffs' 3 Plan

District 14

Appendix B6

Table with Neighborhood Demographics

Table with Neighborhood Splits

Jacksonville, FL

MCC Neighborhoods

Voting Age Population

Neighborhood	Pop Density Pop/Sq Mil	Population	VAP	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
29th & Chase	6,919	2,018	1,438	31	2.16%	50	3.48%	1,354	94.16%
45th & Moncrie f	1,969	3,283	2,174	39	1.79%	125	5.75%	2,008	92.36%
Alderman Park	4,217	3,745	2,845	326	11.46%	1,371	48.19%	913	32.09%
Allendale	2,537	2,320	1,604	62	3.87%	285	17.77%	1,228	76.56%
Argyle Forrest	2,962	4,658	3,499	474	13.55%	1,675	47.87%	1,096	31.32%
Arlington	3,734	5,200	3,886	714	18.37%	1,574	40.50%	1,480	38.09%
Arlington Hills	5,891	8,148	6,319	869	13.75%	2,683	42.46%	2,302	36.43%
Arlington Manor	6,025	5,410	4,098	770	18.79%	1,288	31.43%	1,835	44.78%
Arlingtonwood	3,741	6,233	4,880	842	17.25%	2,183	44.73%	1,468	30.08%
Arrowhead	3,917	3,758	3,010	357	11.86%	2,108	70.03%	300	9.97%
Atantic Highlands	2,921	2,821	2,392	169	7.07%	1,935	80.89%	122	5.10%
Atlantic Beach	4,067	13,107	10,948	634	5.79%	8,898	81.28%	849	7.75%
Atlantic Blvd. Estate	3,469	4,219	3,234	408	12.62%	1,718	53.12%	931	28.79%
Avondale	4,225	5,720	4,811	288	5.99%	4,150	86.26%	141	2.93%
Baldwin	689	1,396	1,054	40	3.80%	724	68.69%	246	23.34%
Bayard	1,008	237	153	28	18.30%	58	37.91%	50	32.68%
Baymeadows	4,176	14,999	12,771	1,856	14.53%	6,530	51.13%	2,773	21.71%
Baymeadows Center	290	628	534	89	16.67%	214	40.07%	192	35.96%
Beach Haven	3,155	5,552	4,439	352	7.93%	3,400	76.59%	278	6.26%
Beachwood	2,818	1,632	1,253	286	22.83%	528	42.14%	297	23.70%
Beacon Hills & Harbou	1,779	3,332	2,687	166	6.18%	2,158	80.31%	179	6.66%
Beauclec	2,197	2,429	1,978	102	5.16%	1,673	84.58%	81	4.10%
Biltmore	701	2,837	2,136	90	4.21%	928	43.45%	1,014	47.47%
Biscayne	1,915	3,937	2,979	94	3.16%	392	13.16%	2,440	81.91%
Biscayne Terrace	1,835	3,089	2,340	114	4.87%	386	16.50%	1,828	78.12%
Black Hammock Island	84	971	787	23	2.92%	710	90.22%	21	2.67%
Blount Island	5	20	18	7	38.89%	7	38.89%	3	16.67%
Bowden	192	49	38	14	36.84%	8	21.05%	8	21.05%
Brackridge	1,996	750	562	121	21.53%	337	59.96%	58	10.32%
Brentwood	3,993	6,815	5,044	142	2.82%	566	11.22%	4,304	85.33%
Briarwood	4,141	2,884	2,404	268	11.15%	1,740	72.38%	285	11.86%
Brooklyn	2,750	1,142	1,099	112	10.19%	669	60.87%	209	19.02%
Brown Island	83	384	326	11	3.37%	255	78.22%	38	11.66%
Bulls Bay	173	558	473	30	6.34%	380	80.34%	38	8.03%
Carver Manor	2,804	2,367	1,876	14	0.75%	41	2.19%	1,809	96.43%
Cedar Hills	3,791	7,748	5,710	684	11.98%	2,358	41.30%	2,277	39.88%
Cedar Hills Estates	4,602	4,344	3,292	362	11.00%	1,514	45.99%	1,230	37.36%
Charter Point	4,761	4,875	3,691	294	7.97%	1,453	39.37%	1,753	47.49%
Chimney Lakes	1,667	18,624	14,333	1,861	12.98%	6,671	46.54%	4,442	30.99%
Cisco Gardens	83	1,015	841	40	4.76%	712	84.66%	49	5.83%
Clifton	4,135	1,461	1,171	138	11.78%	650	55.51%	337	28.78%
Cobblestone	3,370	4,565	3,582	309	8.63%	2,215	61.84%	740	20.66%
College Gardens	1,731	1,864	1,449	31	2.14%	35	2.42%	1,367	94.34%
College Park	2,569	2,364	1,776	57	3.21%	253	14.25%	1,437	80.91%
Colony Cove	2,625	817	652	42	6.44%	480	73.62%	80	12.27%
Commonwealth	227	656	523	40	7.65%	372	71.13%	68	13.00%
Confederate Point	4,233	3,248	2,535	225	8.88%	1,039	40.99%	1,170	46.15%
Copper Hill	1,393	1,512	1,167	35	3.00%	268	22.96%	817	70.01%
Craven	4,559	8,562	6,876	910	13.23%	4,091	59.50%	1,303	18.95%
Crystal Springs	1,529	7,070	5,539	278	5.02%	3,304	59.65%	1,563	28.22%
Deercreek	611	3,286	2,689	199	7.40%	1,653	61.47%	284	10.56%
Deerwood	1,915	14,881	12,377	1,192	9.63%	7,995	64.60%	1,518	12.26%

Jacksonville, FL

MCCN Neighborhoods

Voting Age Population

Neighborhood	Pop Density Pop/Sq Mil	Population	VAP	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
Deerwood Center	537	951	764	82	10.73%	403	52.75%	201	26.31%
Del Rio	2,524	7,195	5,725	386	6.74%	4,546	79.41%	346	6.04%
Dinsmore	517	2,840	2,171	100	4.61%	1,234	56.84%	726	33.44%
Downtown	7,258	5,109	4,977	226	4.54%	2,043	41.05%	2,627	52.78%
Duclay	3,689	8,706	6,558	1,154	17.60%	2,217	33.81%	2,610	39.80%
Duclay Forest	1,275	3,613	2,703	377	13.95%	938	34.70%	1,155	42.73%
Duval	1,901	3,846	2,911	316	10.86%	1,824	62.66%	566	19.44%
Eagle Bend	129	1,064	865	42	4.86%	721	83.35%	53	6.13%
East Arlington	2,509	19,497	15,056	1,539	10.22%	8,827	58.63%	2,274	15.10%
East Jacksonville	1,912	2,772	1,960	69	3.52%	234	11.94%	1,635	83.42%
East Point	160	240	176	18	10.23%	111	63.07%	19	10.80%
Edgewood	671	348	266	18	6.77%	176	66.17%	57	21.43%
Edgewood Manor	2,518	2,363	1,828	28	1.53%	65	3.56%	1,740	95.19%
Empire Point	2,576	1,885	1,530	152	9.93%	1,045	68.30%	276	18.04%
Englewood	3,753	9,406	7,030	1,828	26.00%	3,229	45.93%	1,202	17.10%
Fairfax	2,687	1,882	1,560	66	4.23%	1,357	86.99%	47	3.01%
Fairfield	1,699	1,121	824	38	4.61%	225	27.31%	551	66.87%
Fara Ways Forrest	4,359	2,989	2,342	311	13.28%	1,238	52.86%	655	27.97%
Forrest Trails	299	5,203	3,885	225	5.79%	1,059	27.26%	2,530	65.12%
Fort Caroline Shores	952	3,203	2,587	167	6.46%	2,036	78.70%	162	6.26%
Fort George Island	93	459	392	23	5.87%	325	82.91%	25	6.38%
Garden City	1,730	2,290	1,728	116	6.71%	517	29.92%	1,036	59.95%
Gilmore	1,714	1,028	871	38	4.36%	664	76.23%	99	11.37%
Girvin	1,365	6,305	5,199	373	7.17%	3,929	75.57%	406	7.81%
Glynea/Grove Park	3,164	5,947	4,725	775	16.40%	3,141	66.48%	567	12.00%
Golden Glades/The Woo	3,928	23,438	18,199	2,792	15.34%	11,531	63.36%	1,893	10.40%
Goodbys Creek	4,532	3,127	2,562	299	11.67%	1,809	70.61%	297	11.59%
Grand Park	3,188	3,749	2,845	50	1.76%	51	1.79%	2,736	96.17%
Greenfield Monor	5,304	2,724	2,172	544	25.05%	1,014	46.69%	390	17.96%
Greenland	1,711	11,495	8,875	761	8.57%	5,530	62.31%	1,116	12.57%
Harborview	2,060	2,213	1,772	29	1.64%	52	2.93%	1,684	95.03%
Herlong	1,444	7,775	5,812	528	9.08%	2,067	35.56%	2,667	45.89%
Hidden Hills	3,695	3,440	2,760	273	9.89%	1,736	62.90%	550	19.93%
Highlands	2,920	11,126	8,203	568	6.92%	2,242	27.33%	5,221	63.65%
Hillcrest	4,040	8,021	5,722	473	8.27%	2,411	42.14%	2,507	43.81%
Hogan	3,599	1,277	989	197	19.92%	535	54.10%	227	22.95%
Hogans Creek	2,725	2,126	1,351	44	3.26%	143	10.58%	1,147	84.90%
Holiday Harbors	887	1,331	1,116	70	6.27%	926	82.97%	36	3.23%
Holiday Hill/Century	5,937	9,184	7,088	1,529	21.57%	2,680	37.81%	2,304	32.51%
Holly Oaks	2,535	2,395	1,882	201	10.68%	1,288	68.44%	249	13.23%
Hollyford	494	606	460	25	5.43%	300	65.22%	100	21.74%
Hyde Park	3,150	9,398	7,080	554	7.82%	2,644	37.34%	3,595	50.78%
Imeson Park	150	918	692	41	5.92%	384	55.49%	219	31.65%
Isle of Palms	2,541	4,806	3,806	277	7.28%	2,924	76.83%	332	8.72%
Jacksonville Beach	2,812	23,830	20,404	1,052	5.16%	17,625	86.38%	720	3.53%
Jacksonville Farms/Te	821	6,669	4,803	397	8.27%	2,080	43.31%	1,984	41.31%
Jacksonville Heights	4,983	12,790	9,387	1,323	14.09%	3,053	32.52%	4,431	47.20%
Jacksonville North Estat e	404	2,441	2,016	230	11.41%	987	48.96%	659	32.69%
Jamestown	825	2,312	1,819	100	5.50%	1,402	77.08%	207	11.38%
Jax Heights South	1,595	5,878	4,374	656	15.00%	2,044	46.73%	1,443	32.99%
Jax Heights West	1,707	5,438	3,995	570	14.27%	1,340	33.54%	1,918	48.01%
Julington Creek	1,986	7,299	5,993	346	5.77%	4,991	83.28%	285	4.76%

Jacksonville, FL

MCC Neighborhoods

Voting Age Population

Neighborhood	Pop Density Pop/Sq Mil	Population	VAP	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
Kilarney Shores	2,184	1,326	844	117	13.86%	306	36.26%	314	37.20%
Lackawanna	2,504	3,460	2,491	150	6.02%	505	20.27%	1,779	71.42%
Lake Forrest	3,136	3,417	2,556	83	3.25%	461	18.04%	1,983	77.58%
Lake Forrest Hills	3,641	2,976	2,336	37	1.58%	110	4.71%	2,178	93.24%
Lake Lucina	5,701	4,933	3,816	715	18.74%	1,687	44.21%	1,282	33.60%
Lakeshore	2,921	4,080	3,302	289	8.75%	2,321	70.29%	477	14.45%
Lakewood	2,781	4,769	3,906	382	9.78%	2,799	71.66%	483	12.37%
LaVilla	2,083	854	745	33	4.43%	223	29.93%	449	60.27%
Lincoln Hills	1,337	4,701	3,533	133	3.76%	548	15.51%	2,800	79.25%
Little Marsh Hill	2,641	519	445	37	8.31%	359	80.67%	17	3.82%
Longbranch	3,769	2,069	1,497	54	3.61%	52	3.47%	1,390	92.85%
Loretto	4,682	8,031	6,438	832	12.92%	4,502	69.93%	660	10.25%
Love Grove/Riviera Ma	2,102	1,096	910	73	8.02%	672	73.85%	110	12.09%
Magnolia Gardens	2,545	3,961	2,880	44	1.53%	82	2.85%	2,738	95.07%
Mandarin	1,663	10,396	8,674	514	5.93%	7,277	83.89%	364	4.20%
Mandarin Station	2,637	12,143	9,635	1,015	10.53%	6,581	68.30%	956	9.92%
Marietta	627	3,253	2,566	181	7.05%	2,013	78.45%	204	7.95%
Maxville	113	620	483	34	7.04%	392	81.16%	39	8.07%
Mayport	2,208	284	208	14	6.73%	167	80.29%	15	7.21%
McGirts Creek	1,760	5,080	3,891	454	11.67%	1,507	38.73%	1,623	41.71%
Mid Westside	5,503	8,350	6,315	222	3.52%	340	5.38%	5,723	90.63%
Midtown	80	53	40	12	30.00%	13	32.50%	15	37.50%
Miramer	3,435	4,204	3,136	177	5.64%	2,771	88.36%	44	1.40%
Mixon Town	1,006	1,137	909	37	4.07%	102	11.22%	761	83.72%
Monclair	2,595	1,469	1,160	59	5.09%	1,006	86.72%	38	3.28%
Moncrief	6,120	3,285	2,425	76	3.13%	92	3.79%	2,256	93.03%
Monterey	5,032	2,885	2,322	311	13.39%	1,090	46.94%	785	33.81%
Murray Hill	4,717	9,481	7,806	526	6.74%	5,128	65.69%	1,709	21.89%
Naval Air Station	161	1,393	1,203	209	17.37%	655	54.45%	263	21.86%
Neptune Beach	2,743	7,217	5,978	276	4.62%	5,324	89.06%	91	1.52%
New Berlin	88	177	135	10	7.41%	78	57.78%	39	28.89%
New Town	5,941	2,647	2,050	122	5.95%	138	6.73%	1,778	86.73%
Normandy	829	570	431	28	6.50%	235	54.52%	123	28.54%
Normandy Estates	3,591	6,367	4,651	646	13.89%	2,261	48.61%	1,455	31.28%
Normandy Manor	2,681	4,958	3,679	363	9.87%	1,808	49.14%	1,235	33.57%
Normandy Village	2,439	2,384	1,598	140	8.76%	753	47.12%	626	39.17%
North Beach	1,738	9,531	7,627	828	10.86%	5,099	66.85%	1,081	14.17%
North Lake	332	312	288	5	1.74%	60	20.83%	220	76.39%
North New Berlin	84	254	214	23	10.75%	166	77.57%	15	7.01%
Oak Haven	2,957	1,037	888	93	10.47%	688	77.48%	73	8.22%
Oak Hill	2,978	7,846	5,709	806	14.12%	1,822	31.91%	2,726	47.75%
Oceanway	1,400	11,323	8,529	774	9.07%	4,748	55.67%	2,360	27.67%
Ortega	2,492	2,328	1,837	62	3.38%	1,695	92.27%	31	1.69%
Ortega Farms	3,251	3,617	2,881	224	7.78%	1,471	51.06%	965	33.50%
Ortega Forest	2,544	2,114	1,576	41	2.60%	1,473	93.46%	7	0.44%
Ortega Hills	2,791	8,464	6,415	903	14.08%	2,895	45.13%	2,147	33.47%
Osceola Forrest	2,275	2,000	1,513	38	2.51%	333	22.01%	1,111	73.43%
Otis	448	1,996	1,565	54	3.45%	1,192	76.17%	253	16.17%
Panama Park	2,029	3,015	2,285	109	4.77%	797	34.88%	1,363	59.65%
Park Ridge	4,419	833	631	110	17.43%	404	64.03%	52	8.24%
Paxon	454	640	483	32	6.63%	195	40.37%	238	49.28%
Pecan	1,017	7,550	5,608	446	7.95%	2,805	50.02%	1,993	35.54%

Jacksonville, FL

MCC Neighborhoods

Voting Age Population

Neighborhood	Pop Density Pop/Sq Mil	Population	VAP	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
Phoenix	2,403	1,110	766	51	6.66%	140	18.28%	559	72.98%
Picketville	209	639	520	13	2.50%	402	77.31%	90	17.31%
Pickwick Park	2,703	2,201	1,752	133	7.59%	1,448	82.65%	75	4.28%
Pine Forrest	1,703	1,876	1,260	195	15.48%	324	25.71%	578	45.87%
Pumpkin Hill	110	1,962	1,470	131	8.91%	845	57.48%	372	25.31%
Regency	2,622	7,274	5,912	845	14.29%	2,317	39.19%	2,345	39.67%
Ribault	2,550	2,909	2,178	26	1.19%	63	2.89%	2,064	94.77%
Riverside	5,631	10,038	9,071	648	7.14%	6,933	76.43%	930	10.25%
Riverview	2,879	4,393	3,246	122	3.76%	771	23.75%	2,299	70.83%
Robinsons Addition	3,785	1,870	1,418	66	4.65%	122	8.60%	1,209	85.26%
Rolling Hills	2,541	4,897	3,924	290	7.39%	2,646	67.43%	757	19.29%
Royal Lakes	4,322	4,729	4,062	648	15.95%	1,993	49.06%	1,107	27.25%
Royal Terrace	3,657	2,063	1,547	40	2.59%	45	2.91%	1,463	94.57%
San Jose	5,523	7,259	5,545	1,417	25.55%	2,461	44.38%	1,487	26.82%
San Jose Forrest	2,860	2,065	1,634	103	6.30%	1,339	81.95%	91	5.57%
San Marco	2,716	2,545	2,087	184	8.82%	1,662	79.64%	116	5.56%
San Mateo	1,407	2,501	1,970	140	7.11%	1,579	80.15%	152	7.72%
Sandlewood	3,999	18,430	14,422	2,015	13.97%	6,945	48.16%	2,449	16.98%
Sans Pareil	1,675	6,377	5,266	691	13.12%	3,085	58.58%	865	16.43%
Sans Souci	3,660	5,744	4,634	792	17.09%	2,673	57.68%	719	15.52%
Secret Cove	4,439	8,024	6,770	700	10.34%	3,505	51.77%	1,202	17.75%
Settlers Landing	1,920	4,134	3,218	405	12.59%	1,783	55.41%	782	24.30%
Sherwood Forest	3,908	5,166	3,912	84	2.15%	295	7.54%	3,544	90.59%
South Point	1,179	3,098	2,512	360	14.33%	1,240	49.36%	672	26.75%
South Riverside	4,331	2,337	1,830	170	9.29%	1,122	61.31%	380	20.77%
Southside	3,227	2,665	2,440	166	6.80%	1,824	74.75%	280	11.48%
Southside Estates	1,896	9,445	7,433	1,229	16.53%	4,326	58.20%	1,177	15.83%
Southwood	3,890	3,787	3,130	500	15.97%	2,021	64.57%	351	11.21%
Spring Glen	2,644	2,040	1,617	255	15.77%	851	52.63%	407	25.17%
Spring Park	3,501	5,041	3,781	631	16.69%	1,619	42.82%	1,048	27.72%
Springfield	4,199	5,796	4,747	307	6.47%	1,991	41.94%	2,303	48.51%
St. Johns Bluff	1,964	1,086	876	66	7.53%	705	80.48%	55	6.28%
St. Nicholas	3,798	2,150	1,661	437	26.31%	712	42.87%	455	27.39%
Sunbeam	3,964	9,090	6,929	966	13.94%	4,211	60.77%	1,061	15.31%
Sweetwater	4,556	2,508	1,872	193	10.31%	639	34.13%	880	47.01%
Tallulah/North Shore	4,397	4,205	3,164	123	3.89%	932	29.46%	2,044	64.60%
Tallyrand	172	121	89	8	8.99%	20	22.47%	57	64.04%
The Cape	1,512	8,903	6,472	551	8.51%	3,811	58.88%	1,652	25.53%
Tiger Hole/ Secret Wo	2,248	3,705	3,030	281	9.27%	2,216	73.14%	234	7.72%
Turtle Creek	2,031	7,162	5,507	274	4.98%	401	7.28%	4,819	87.51%
University Park	5,261	3,935	3,077	386	12.54%	1,374	44.65%	1,156	37.57%
Venetia	1,502	2,280	1,822	90	4.94%	1,469	80.63%	173	9.50%
Wesconnett	3,132	5,409	4,112	584	14.20%	2,086	50.73%	1,269	30.86%
Whitehouse	985	5,395	4,194	194	4.63%	3,211	76.56%	620	14.78%
Windy Hill	2,955	16,172	13,419	2,658	19.81%	6,974	51.97%	1,908	14.22%
Woodland Acrea	4,466	8,698	6,255	1,247	19.94%	2,404	38.43%	2,347	37.52%
Woodmere	3,877	3,011	2,260	320	14.16%	1,264	55.93%	575	25.44%
Woodstock	3,503	5,240	3,848	202	5.25%	975	25.34%	2,573	66.87%
Yukon	147	72	54	14	25.93%	33	61.11%	8	14.81%

Jacksonville, FL

Neighborhood Splits

District	Enjoined	2022-800	P1	P2	P3
1	4	4	4	4	4
2	11	10	10	10	10
3	6	6	6	6	6
4	3	4	4	4	4
5	4	3	3	3	3
6	2	2	2	2	2
7	6	6	2	2	5
8	11	6	2	2	4
9	13	11	8	7	6
10	17	14	5	3	7
11	1	1	1	1	1
12	9	5	7	6	5
13	2	2	2	2	2
14	8	7	7	6	4
Total	47	39	30	28	30

Appendix B7

Table with CPAC Districts Included

Maps with CPAC District Splits

Jacksonville, FL

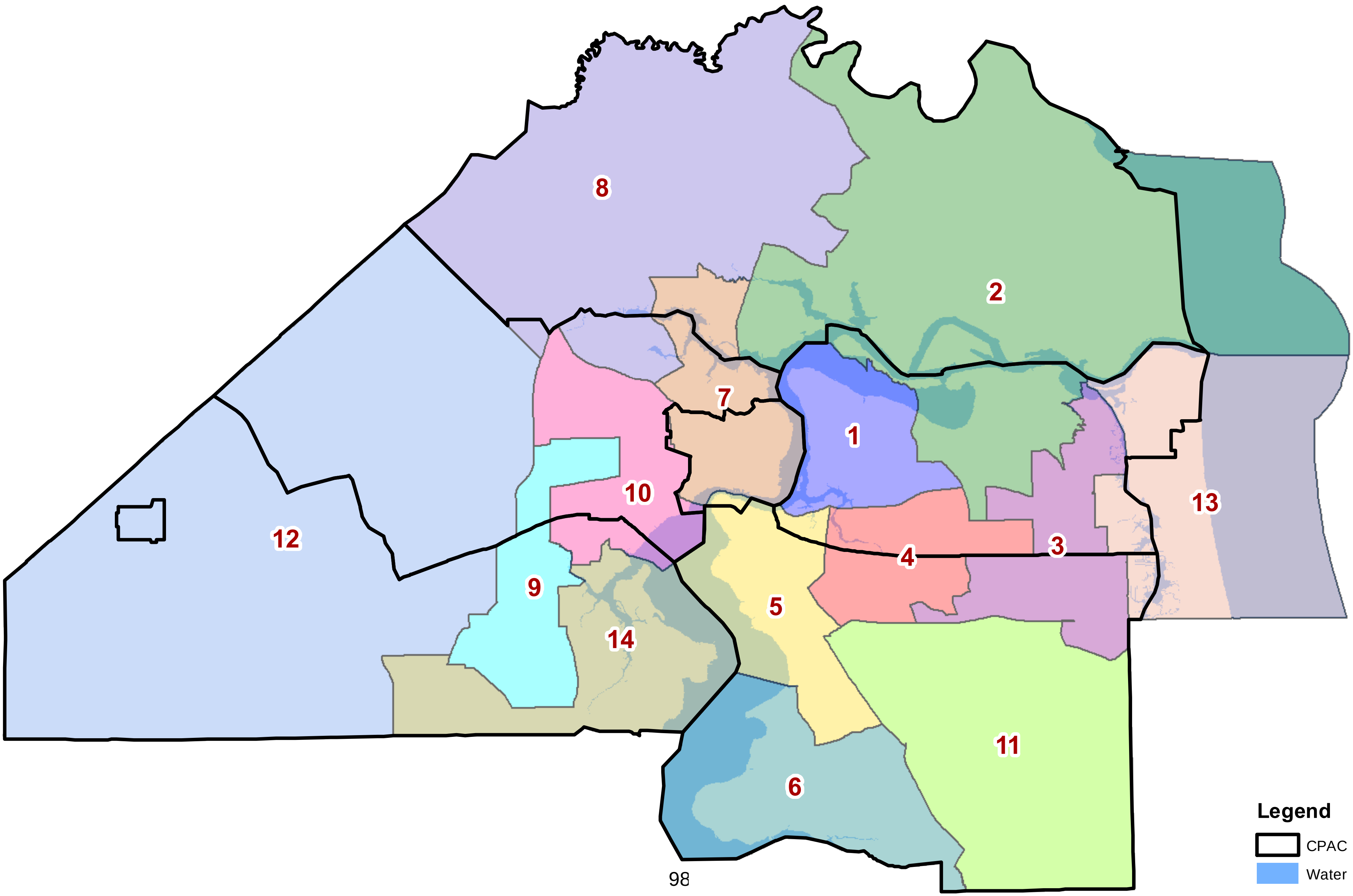
CPAC Included within Districts

District	2022-800	P1	P2	P3
1	1	1	1	1
2	2	2	2	2
3	2	2	2	2
4	2	2	2	2
5	3	3	3	3
6	1	1	1	1
7	3	3	3	3
8	2	2	2	2
9	2	3	3	2
10	3	3	3	3
11	1	1	1	1
12	3	1	2	2
13	2	2	2	2
14	1	1	1	1
Total CPAC	6	6	6	6

Jacksonville, FL

2020-800 Plan

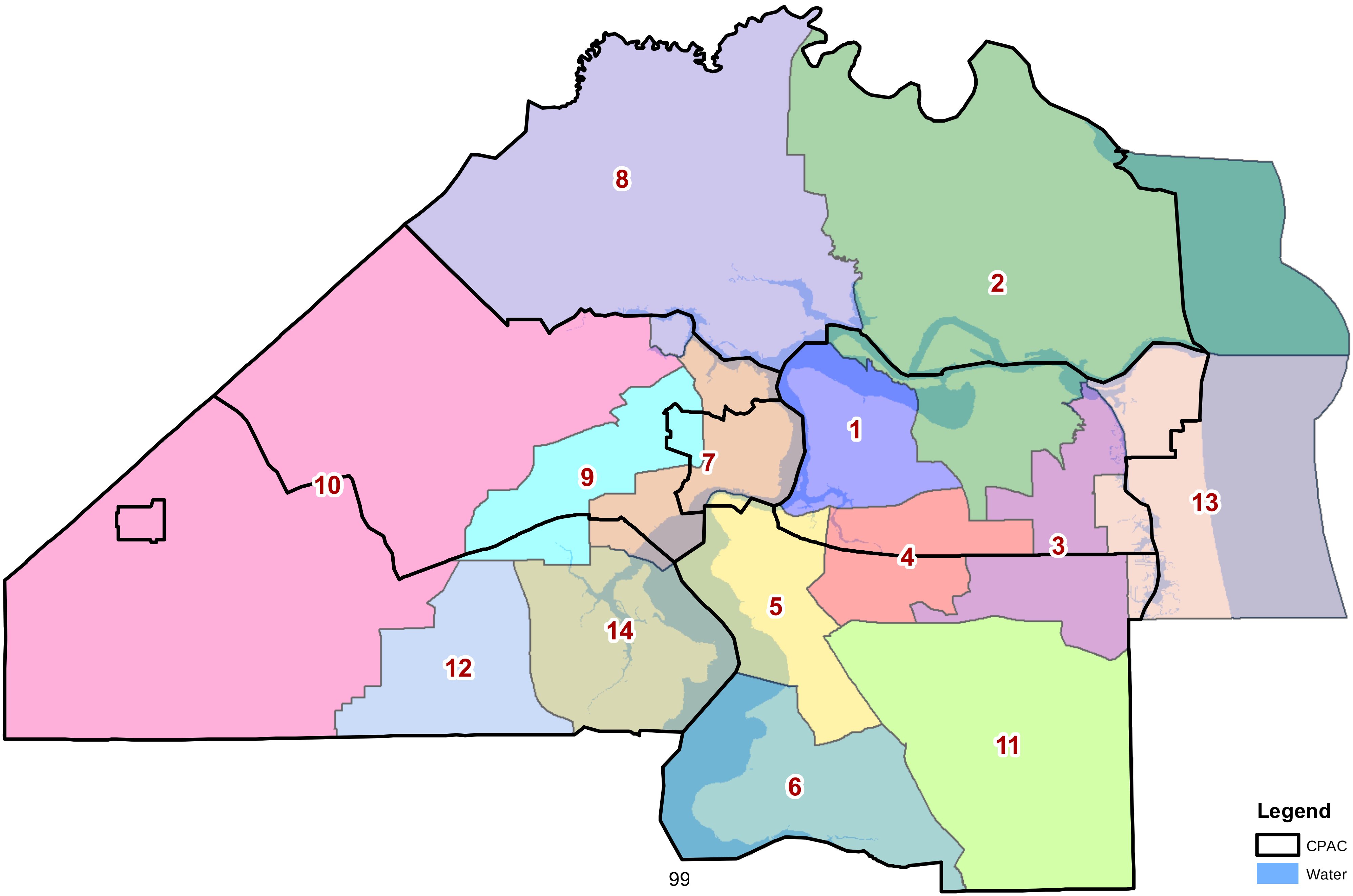
CPAC Districts



Jacksonville, FL

Plaintifs' 1 Plan

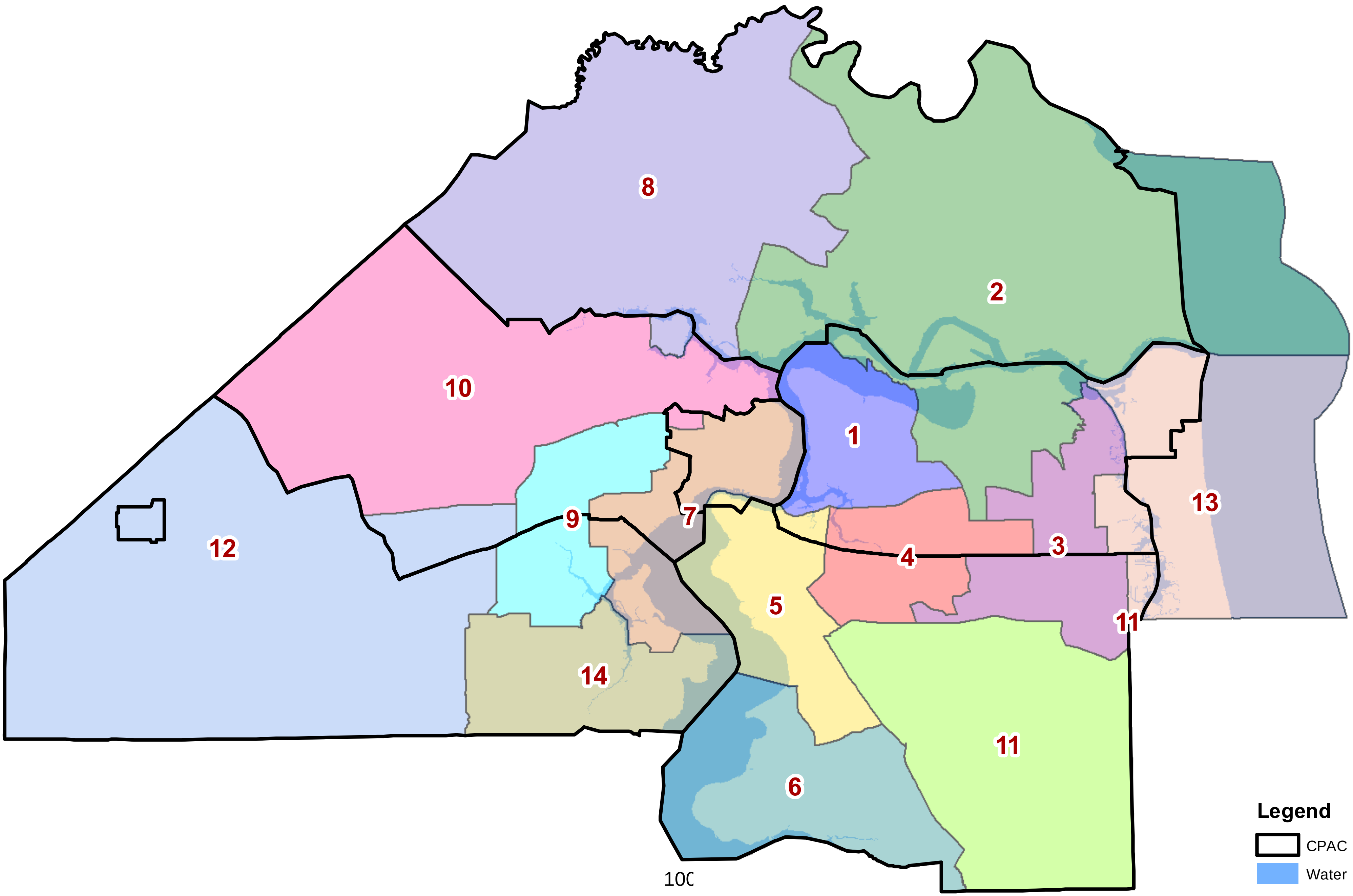
CPAC Districts



Jacksonville, FL

Plaintiffs' 2 Plan

CPAC Districts



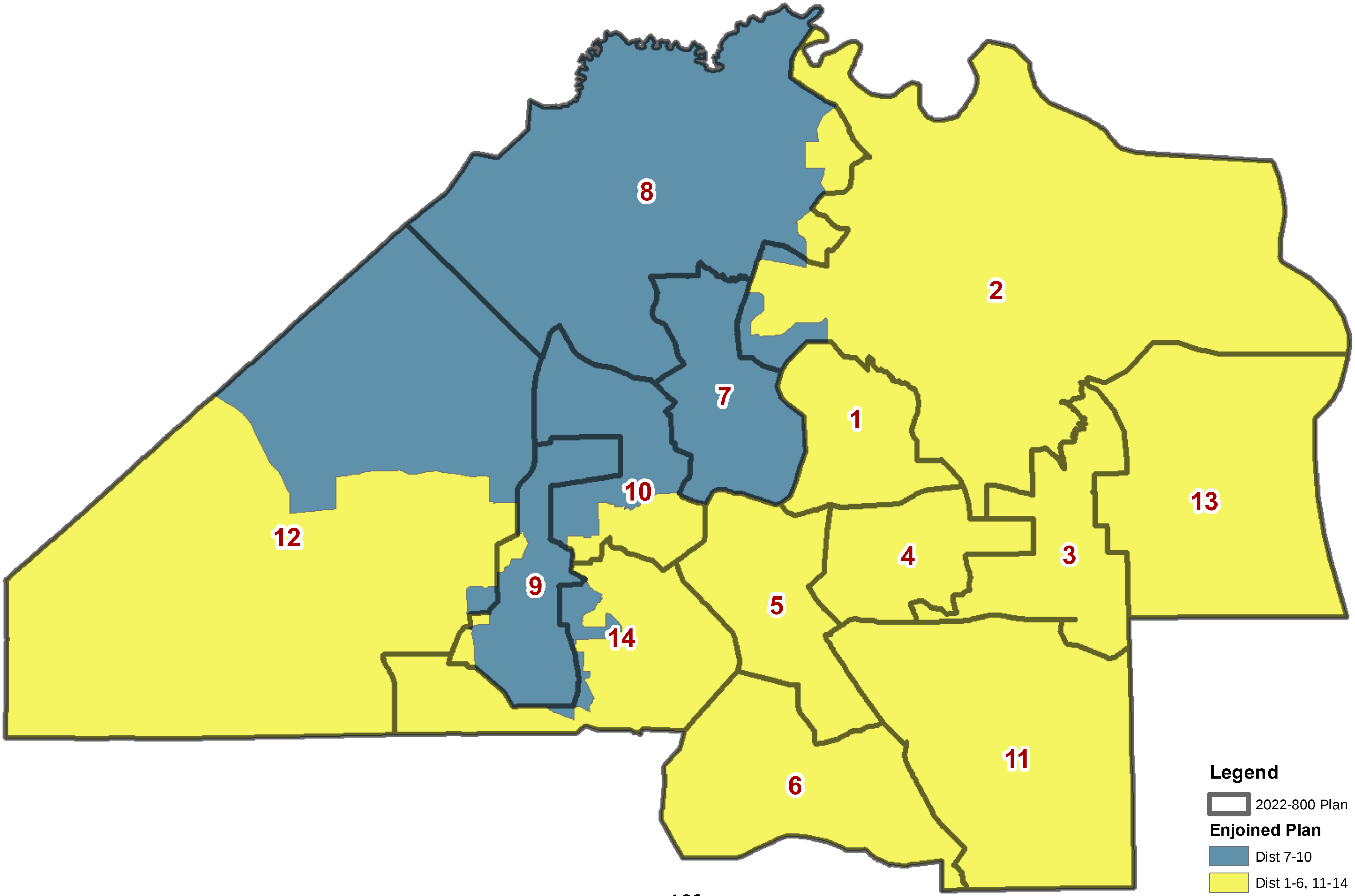
Appendix B8

Map of 2022-800 Plan with
Enjoined Plan Grouped Districts

Jacksonville, FL

2022-800 Plan

Enjoined Plan: Districts 7-10 Merged and District 1-6 & 11-14 Merged



Appendix B9

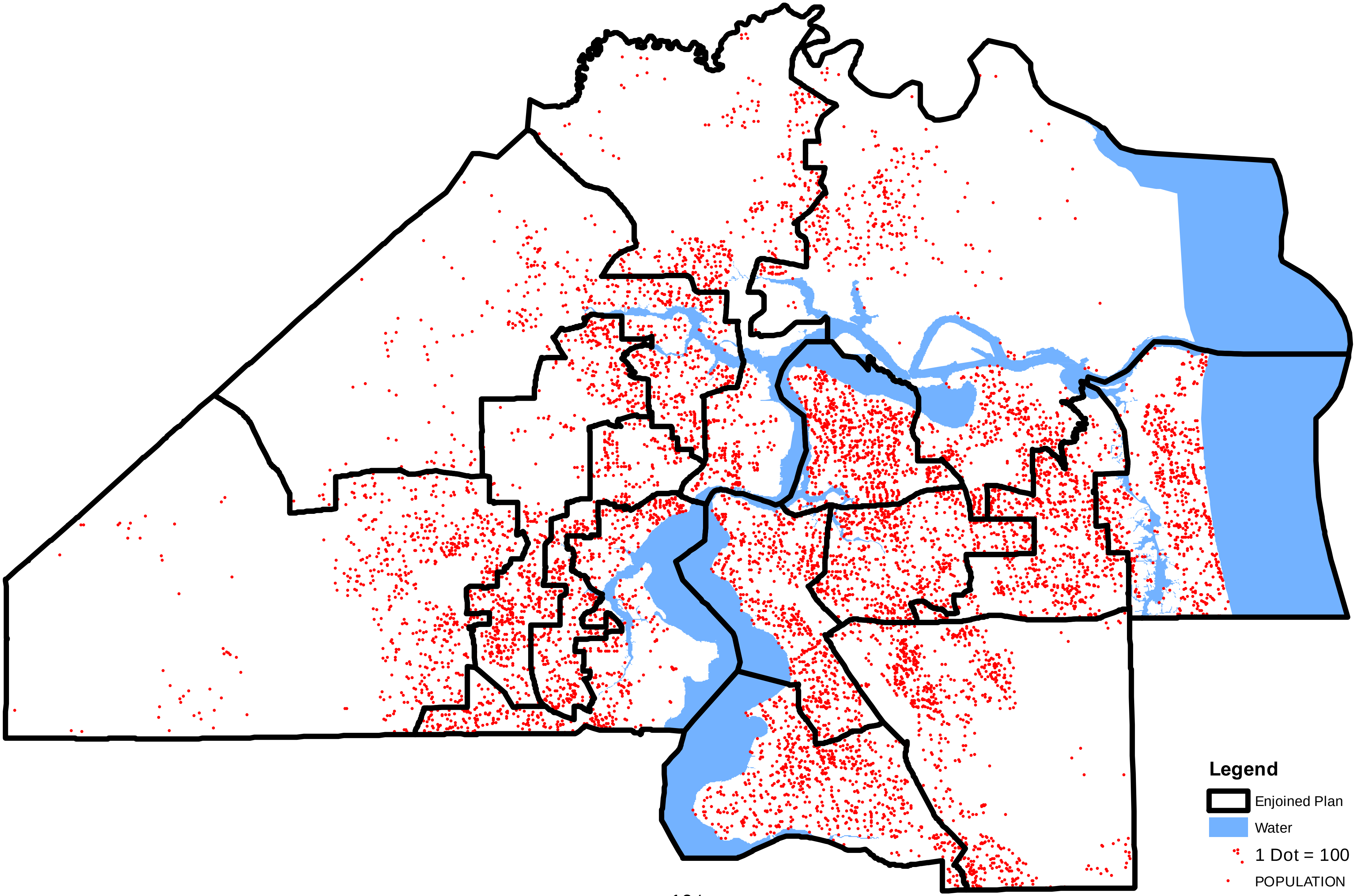
Maps with Plans Displaying Population Density

Table of Plans Displaying Population Density

Jacksonville, FL

Enjoined Plan

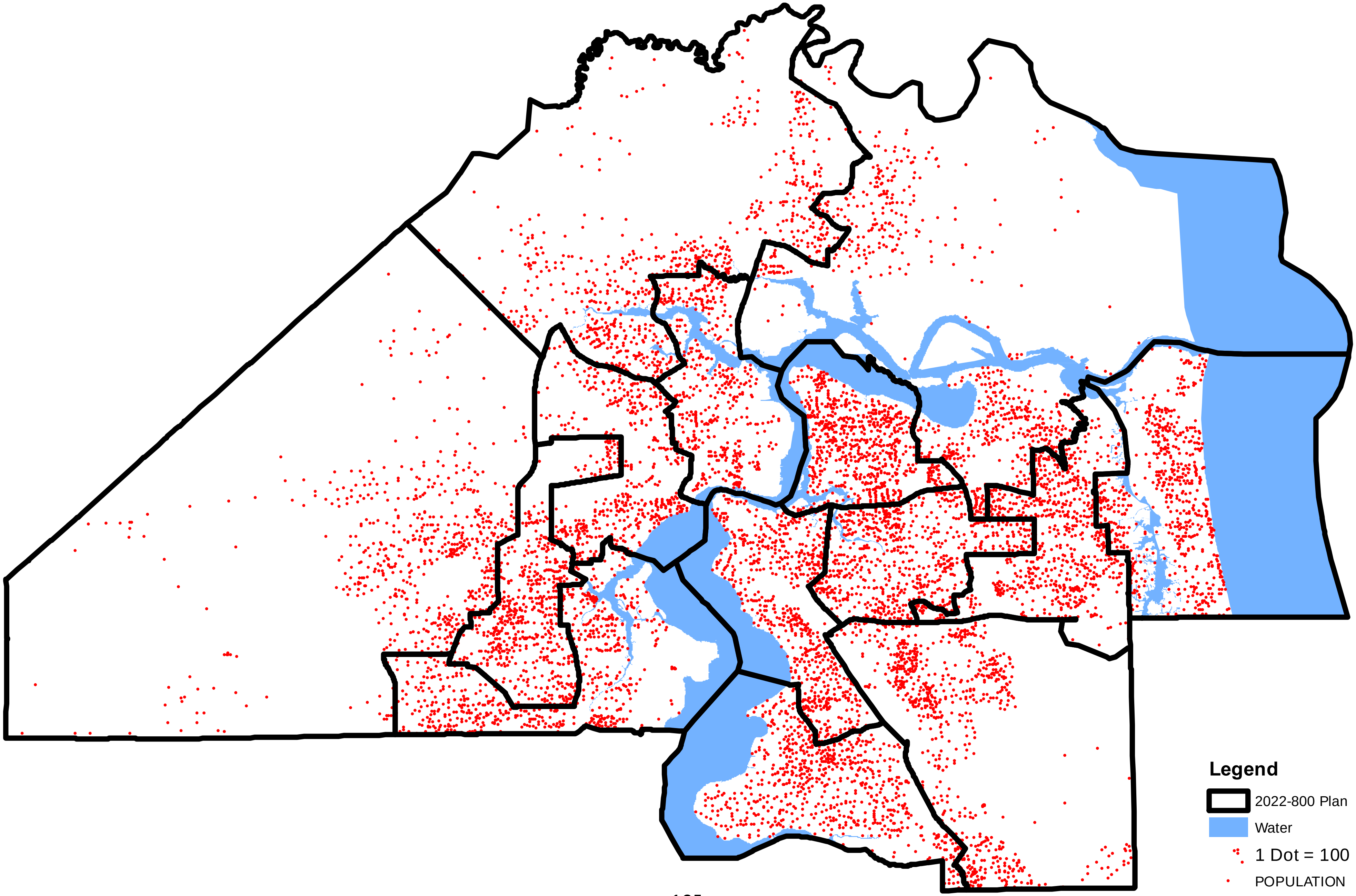
Population Density



Jacksonville, FL

2022-800 Plan

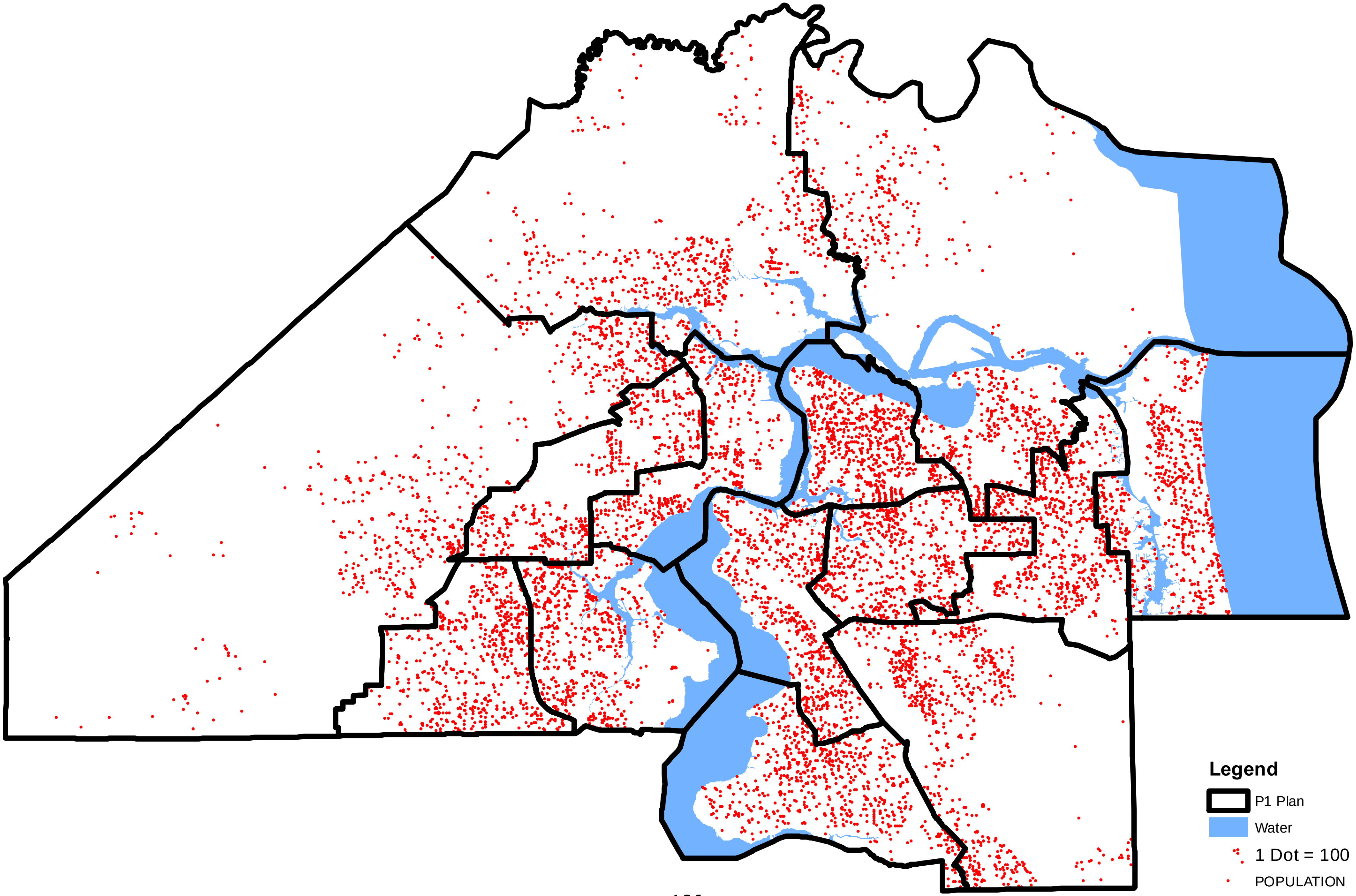
Population Density



Jacksonville, FL

Plaintiffs' 1 Plan

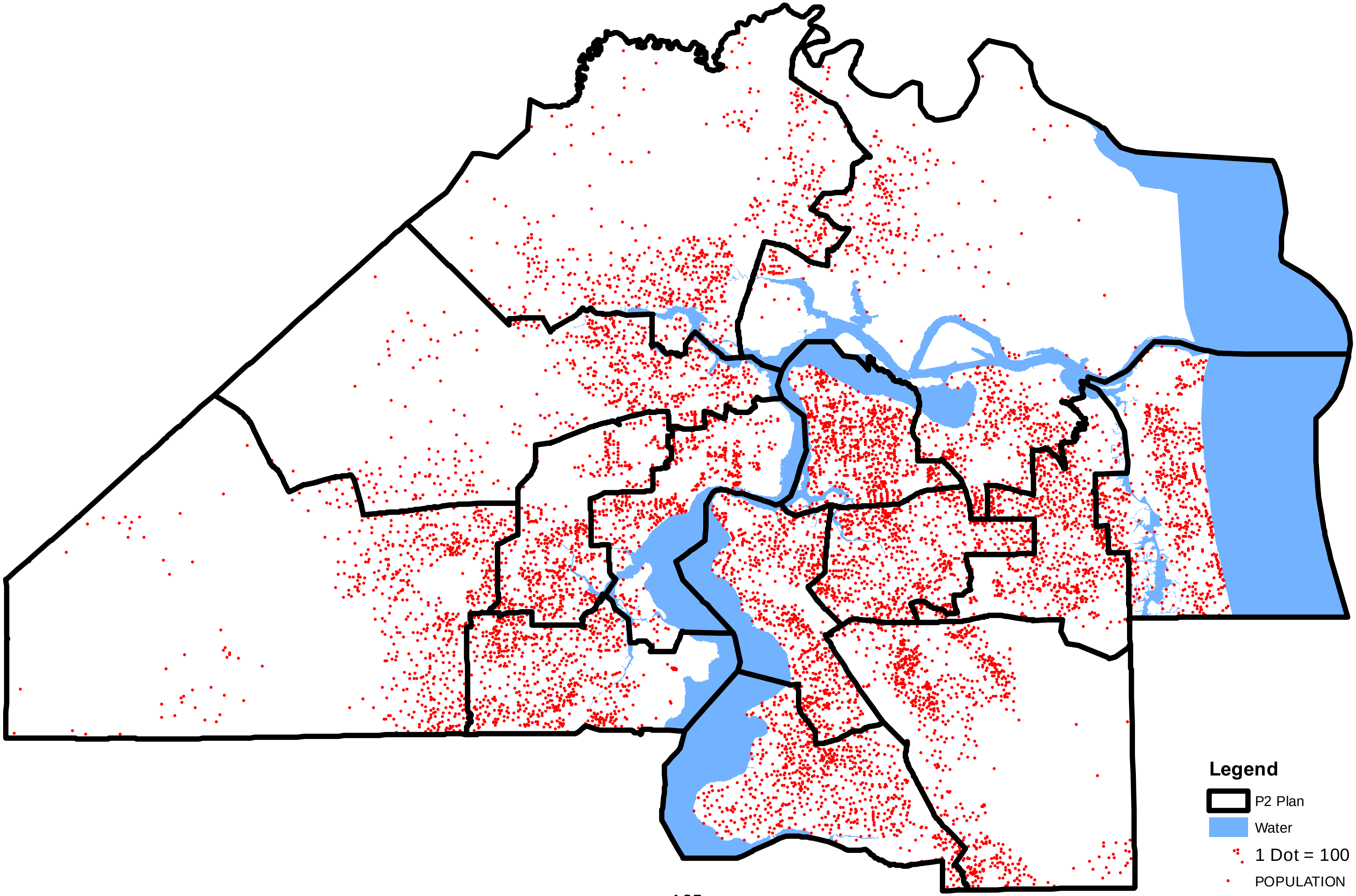
Population Density



Jacksonville, FL

Plaintiffs' 2 Plan

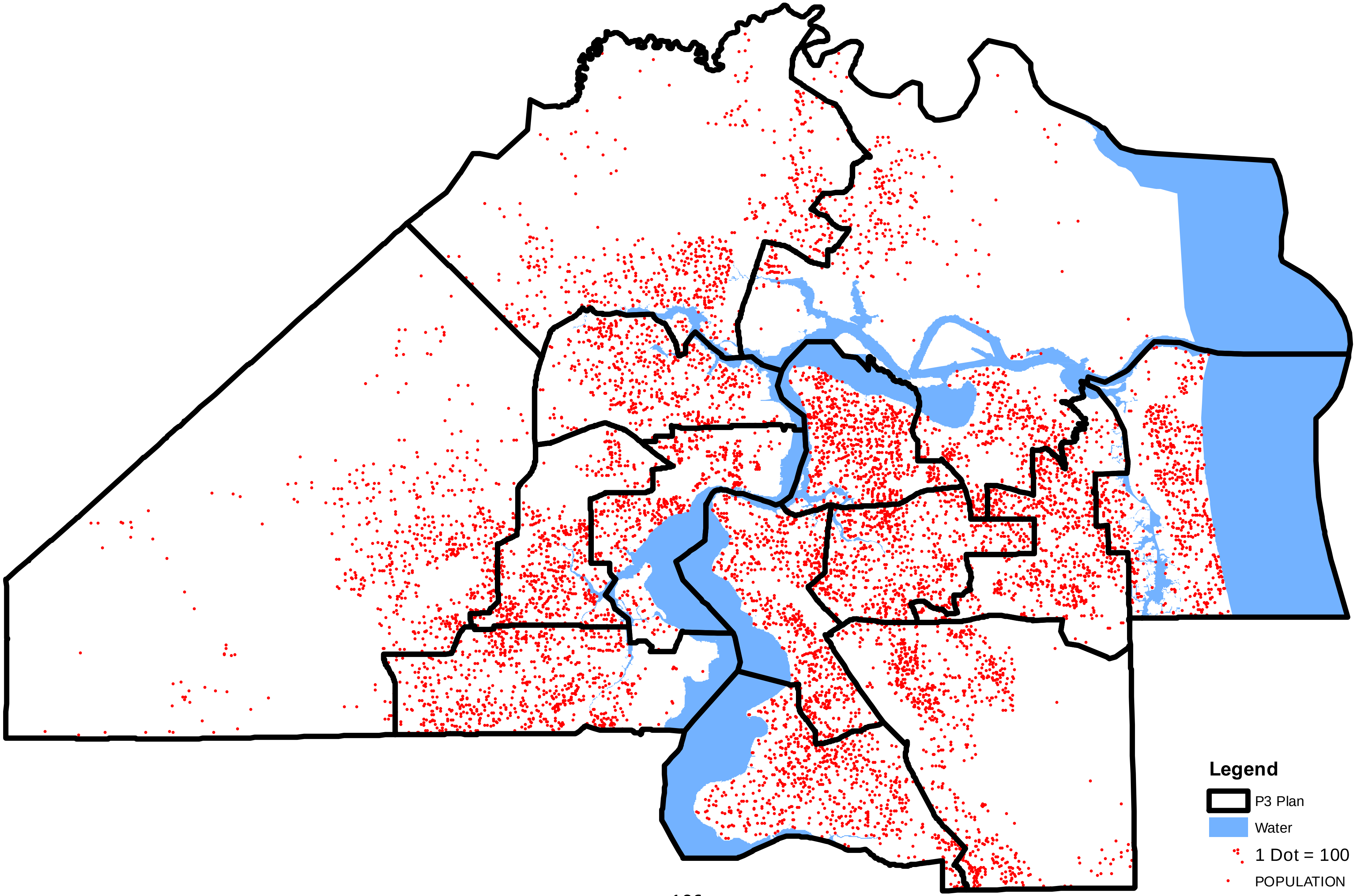
Population Density



Jacksonville, FL

Plaintiffs' 3 Plan

Population Density



Jacksonville, FL
District Population Density
Persons/Square Mile

District	Enjoined	2022-800	P1	P2	P3
1	3,102	3,101	3,101	3,101	3,101
2	411	389	389	389	389
3	2,686	2,459	2,458	2,458	2,458
4	3,085	3,085	3,085	3,085	3,085
5	2,447	2,447	2,447	2,447	2,447
6	1,609	1,609	1,609	1,609	1,609
7	801	2,429	2,533	2,256	2,307
8	594	649	611	611	600
9	3,362	2,768	2,601	2,670	2,699
10	1,908	2,389	336	716	2,310
11	957	985	985	985	985
12	446	318	2,262	464	318
13	1,073	1,073	1,073	1,073	1,073
14	1,726	1,638	1,844	2,055	1,916

Appendix B10

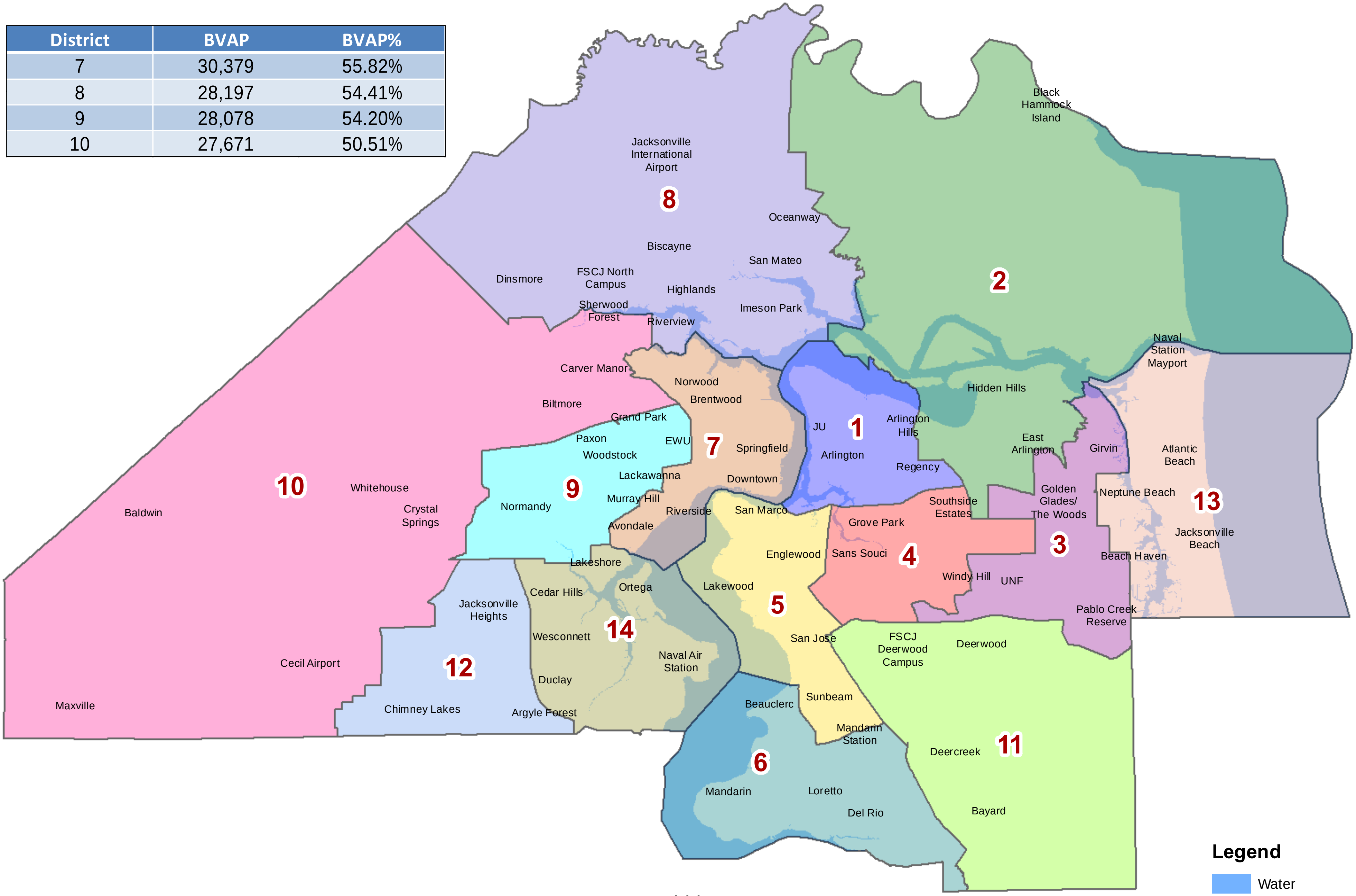
Map of the Demonstration Plan

Jacksonville, FL

Demonstration Plan

w/Neighborhoods

District	BVAP	BVAP%
7	30,379	55.82%
8	28,197	54.41%
9	28,078	54.20%
10	27,671	50.51%



Appendix B11

Table Containing District Core Retention of Challenged Districts of Enjoined Plan

Table Containing Groups Districts of Population Retained from the Enjoined Plan

Jacksonville, FL

District Core Retention
of Challenged Districts of Enjoined Plan

District	Enjoined	2022-800	P1	P2	P3
2	100.00%	98.51%	92.15%	98.51%	98.51%
7	100.00%	51.90%	47.21%	36.94%	29.76%
8	100.00%	35.35%	41.81%	41.70%	40.86%
9	100.00%	37.18%	44.66%	55.29%	46.86%
10	100.00%	19.50%	30.09%	36.48%	34.25%
12	100.00%	81.05%	34.46%	85.43%	81.05%
14	100.00%	69.71%	44.30%	43.98%	44.94%

Jacksonville, FL

District Core Retention

of Enjoined Plan

Grouped Districts 7-10 & 2-12-14

District	Enjoined	2022-800	P1	P2	P3
2-12-14	100.00%	87.42%	65.71%	79.46%	78.63%
7-10	100.00%	88.63%	72.86%	83.10%	83.54%

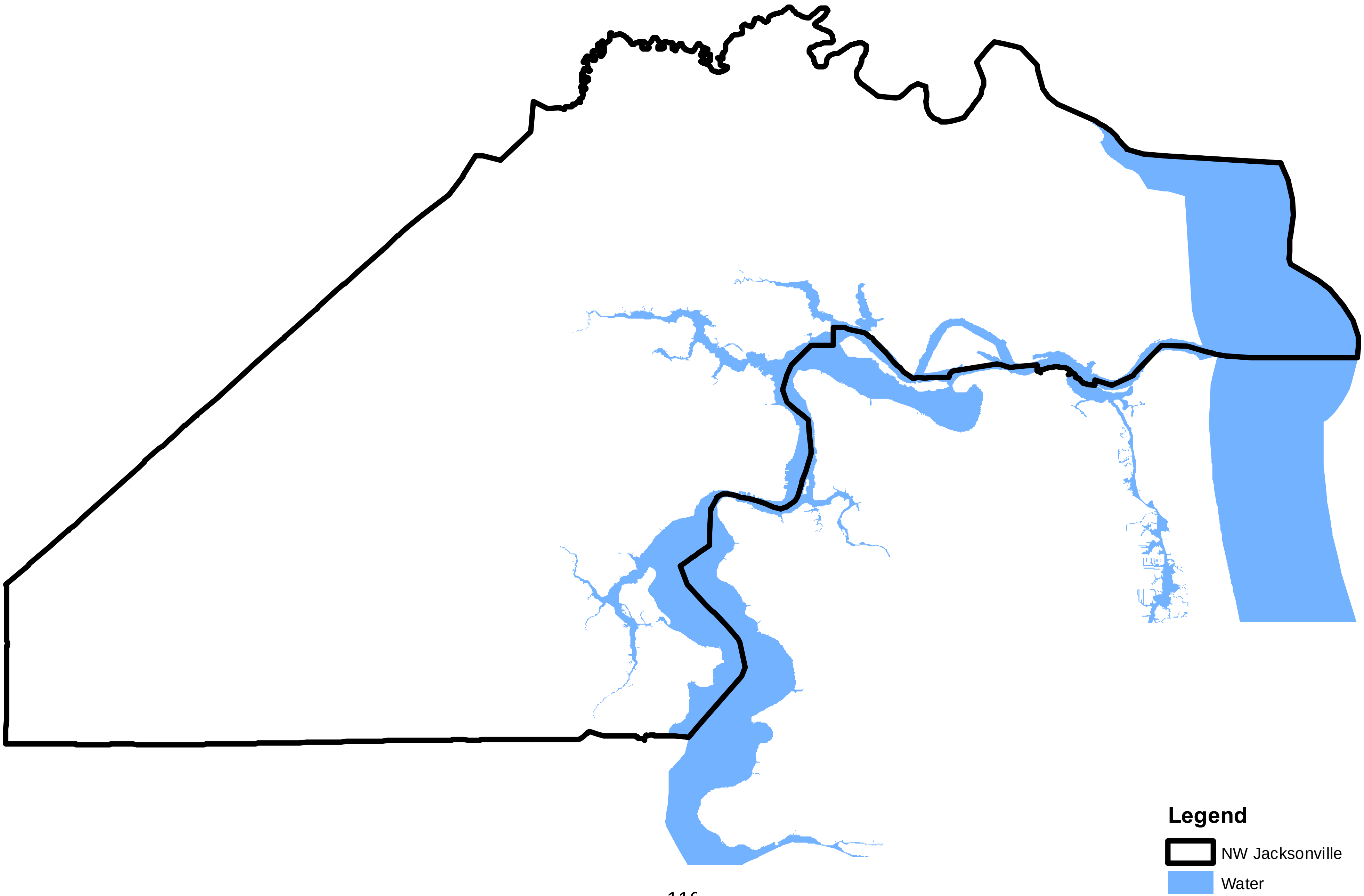
Appendix B12

Map of "NW Jacksonville" Districts

Tables Comparing the Population and Percentages of the "NW Jacksonville" Districts

Jacksonville, FL

NW Jacksonville



Jacksonville, FL

NW Jacksonville Comparison

Enjoined Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	68,060	4,389	6.45%	19,804	29.10%	42,185	61.98%	52,925	77.76%	3,185	6.02%	16,810	31.76%	31,438	59.40%
8	67,916	2,934	4.32%	16,091	23.69%	47,721	70.26%	50,825	74.84%	2,001	3.94%	13,375	26.32%	34,498	67.88%
9	67,745	6,327	9.34%	17,814	26.30%	41,035	60.57%	50,936	75.19%	4,464	8.76%	15,218	29.88%	28,976	56.89%
10	68,777	6,282	9.13%	17,691	25.72%	42,160	61.30%	51,457	74.82%	4,206	8.17%	14,727	28.62%	30,160	58.61%
Total 7-10	272,498	19,932	7.31%	71,400	26.20%	173,101	63.52%	206,143	75.65%	13,856	6.72%	60,130	29.17%	125,072	60.67%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**61.51%**	**52.77%**		**42.43%**		**79.33%**		**60.89%**		**52.72%**		**42.94%**		**80.00%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	32,657	2,819	8.63%	20,052	61.40%	7,493	22.94%	24,822	76.01%	1,917	7.72%	15,984	64.39%	5,144	20.72%
12	67,696	7,324	10.82%	33,847	50.00%	22,543	33.30%	51,206	75.64%	4,932	9.63%	27,368	53.45%	15,610	30.48%
14	70,193	7,697	10.97%	42,976	61.23%	15,076	21.48%	56,379	80.32%	5,575	9.89%	36,543	64.82%	10,512	18.65%
Total 2,12,14	170,546	17,840	10.46%	96,875	56.80%	45,112	26.45%	132,407		12,424		79,895		31,266	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**38.49%**	**47.23%**		**57.57%**		**20.67%**		**39.11%**		**47.28%**		**57.06%**		**20.00%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	32,657	2,819	8.63%	20,052	61.40%	7,493	22.94%	24,822	76.01%	1,917	7.72%	15,984	64.39%	5,144	20.72%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**7.37%**	**7.46%**		**11.92%**		**3.43%**		**7.33%**		**7.29%**		**11.42%**		**3.29%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
12	67,696	7,324	10.82%	33,847	50.00%	22,543	33.30%	51,206	75.64%	4,932	9.63%	27,368	53.45%	15,610	30.48%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.28%**	**19.39%**		**20.11%**		**10.33%**		**15.13%**		**18.77%**		**19.55%**		**9.98%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
14	70,193	7,697	10.97%	42,976	61.23%	15,076	21.48%	56,379	80.32%	5,575	9.89%	36,543	64.82%	10,512	18.65%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.84%**	**20.38%**		**25.54%**		**6.91%**		**16.65%**		**21.21%**		**26.10%**		**6.72%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

2022 300 Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	67,891	3,309	4.87%	13,725	20.22%	49,963	73.59%	51,707	76.16%	2,341	4.53%	12,023	23.25%	36,522	70.63%
8	73,252	4,303	5.87%	19,657	26.83%	47,340	64.63%	55,731	76.08%	3,033	5.44%	15,925	28.57%	35,114	63.01%
9	67,801	8,517	12.56%	21,416	31.59%	34,329	50.63%	50,064	73.84%	5,857	11.70%	17,934	35.82%	23,202	46.34%
10	69,544	4,030	5.79%	25,820	37.13%	37,418	53.80%	55,037	79.14%	2,901	5.27%	22,538	40.95%	27,553	50.06%
Total 7-10	278,488	20,159	7.24%	80,618	28.95%	169,050	60.70%	212,539	76.32%	14,132	6.65%	68,420	32.19%	122,391	57.59%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.86%**	**53.37%**		**47.91%**		**77.47%**		**62.78%**		**53.77%**		**48.86%**		**78.29%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	68,514	8,531	12.45%	34,412	50.23%	21,214	30.96%	53,020	77.39%	6,018	11.35%	28,623	53.99%	14,654	27.64%
Total 2,12,14	164,556	17,613	10.70%	87,657	53.27%	49,163	29.88%	126,011		12,148		71,605		33,947	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.14%**	**46.63%**		**52.09%**		**22.53%**		**37.22%**		**46.23%**		**51.14%**		**21.71%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.42%**	**6.47%**		**10.60%**		**2.86%**		**6.40%**		**6.31%**		**10.21%**		**2.71%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
14	68,514	8,531	12.45%	34,412	50.23%	21,214	30.96%	53,020	77.39%	6,018	11.35%	28,623	53.99%	14,654	27.64%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.46%**	**22.59%**		**20.45%**		**9.72%**		**15.66%**		**22.90%**		**20.44%**		**9.37%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Lime Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	68,465	4,398	6.42%	20,498	29.94%	41,832	61.10%	52,094	76.09%	3,095	5.94%	16,812	32.27%	30,691	58.91%
8	69,946	2,841	4.06%	12,193	17.43%	54,110	77.36%	53,781	76.89%	2,057	3.82%	10,897	20.26%	40,088	74.54%
9	67,702	7,939	11.73%	25,395	37.51%	31,075	45.90%	50,399	74.44%	5,366	10.65%	21,125	41.92%	20,994	41.66%
10	68,046	3,703	5.44%	25,548	37.55%	36,565	53.74%	53,884	79.19%	2,709	5.03%	22,217	41.23%	26,979	50.07%
Total 7-10	274,159	18,881	6.89%	83,634	30.51%	163,582	59.67%	210,158	76.66%	13,227	6.29%	71,051	33.81%	118,752	56.51%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**61.88%**	**49.99%**		**49.70%**		**74.96%**		**62.08%**		**50.33%**		**50.74%**		**75.96%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
12	68,198	7,030	10.31%	35,144	51.53%	21,668	31.77%	51,882	76.08%	4,762	9.18%	28,450	54.84%	15,115	29.13%
14	67,755	8,926	13.17%	30,296	44.71%	24,440	36.07%	51,684	76.28%	6,296	12.18%	25,323	49.00%	16,601	32.12%
Total 2,12,14	168,885	18,891	11.19%	84,641	50.12%	54,631	32.35%	128,392		13,053		68,974		37,586	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**38.12%**	**50.01%**		**50.30%**		**25.04%**		**37.92%**		**49.67%**		**49.26%**		**24.04%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**7.43%**	**7.77%**		**11.41%**		**3.91%**		**7.33%**		**7.59%**		**10.86%**		**3.75%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
12	68,198	7,030	10.31%	35,144	51.53%	21,668	31.77%	51,882	76.08%	4,762	9.18%	28,450	54.84%	15,115	29.13%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.39%**	**18.61%**		**20.88%**		**9.93%**		**15.32%**		**18.12%**		**20.32%**		**9.67%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
14	67,755	8,926	13.17%	30,296	44.71%	24,440	36.07%	51,684	76.28%	6,296	12.18%	25,323	49.00%	16,601	32.12%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.29%**	**23.63%**		**18.00%**		**11.20%**		**15.27%**		**23.96%**		**18.08%**		**10.62%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	68,465	4,398	6.42%	20,498	29.94%	41,832	61.10%	52,094	76.09%	3,095	5.94%	16,812	32.27%	30,691	58.91%
8	69,946	2,841	4.06%	12,193	17.43%	54,110	77.36%	53,781	76.89%	2,057	3.82%	10,897	20.26%	40,088	74.54%
9	68,233	8,833	12.95%	22,090	32.37%	33,646	49.31%	50,566	74.11%	6,050	11.96%	18,507	36.60%	22,816	45.12%
10	68,314	3,881	5.68%	23,754	34.77%	38,496	56.35%	53,451	78.24%	2,799	5.24%	20,619	38.58%	28,063	52.50%
Total 7-10	274,958	19,953	7.26%	78,535	28.56%	168,084	61.13%	209,892	76.34%	14,001	6.67%	66,835	31.84%	121,658	57.96%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.06%**	**52.82%**		**46.67%**		**77.03%**		**62.00%**		**53.28%**		**47.73%**		**77.82%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	67,569	8,245	12.20%	35,135	52.00%	19,897	29.45%	52,522	77.73%	5,812	11.07%	29,310	55.81%	13,747	26.17%
Total 2,12,14	168,086	17,819	10.60%	89,740	53.39%	50,129	29.82%	128,658		12,279		73,190		34,680	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.94%**	**47.18%**		**53.33%**		**22.97%**		**38.00%**		**46.72%**		**52.27%**		**22.18%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**7.43%**	**7.77%**		**11.41%**		**3.91%**		**7.33%**		**7.59%**		**10.86%**		**3.75%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
14	67,569	8,245	12.20%	35,135	52.00%	19,897	29.45%	52,522	77.73%	5,812	11.07%	29,310	55.81%	13,747	26.17%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.25%**	**21.83%**		**20.88%**		**9.12%**		**15.51%**		**22.12%**		**20.93%**		**8.79%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon Map Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	68,223	9,731	14.26%	24,950	36.57%	28,745	42.13%	51,398	75.34%	6,812	13.25%	20,865	40.60%	19,668	38.27%
8	72,280	4,128	5.71%	19,515	27.00%	46,871	64.85%	55,356	76.59%	2,897	5.23%	15,998	28.90%	34,923	63.09%
9	67,596	4,538	6.71%	17,654	26.12%	43,459	64.29%	50,580	74.83%	3,091	6.11%	14,937	29.53%	30,771	60.84%
10	67,964	3,024	4.45%	12,611	18.56%	51,581	75.89%	51,712	76.09%	2,092	4.05%	10,953	21.18%	37,968	73.42%
Total 7-10	276,063	21,421	7.76%	74,730	27.07%	170,656	61.82%	209,046	75.72%	14,892	7.12%	62,753	30.02%	123,330	59.00%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.31%**	**56.71%**		**44.41%**		**78.21%**		**61.75%**		**56.67%**		**44.82%**		**78.89%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	30,826	2,719	8.82%	18,007	58.41%	8,011	25.99%	23,264	75.47%	1,846	7.94%	14,282	61.39%	5,537	23.80%
12	67,913	6,754	9.95%	34,605	50.95%	22,827	33.61%	51,210	75.41%	4,541	8.87%	27,930	54.54%	15,731	30.72%
14	68,242	6,878	10.08%	40,933	59.98%	16,719	24.50%	55,030	80.64%	5,001	9.09%	35,060	63.71%	11,740	21.33%
Total 2,12,14	166,981	16,351	9.79%	93,545	56.02%	47,557	28.48%	129,504		11,388		77,272		33,008	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.69%**	**43.29%**		**55.59%**		**21.79%**		**38.25%**		**43.33%**		**55.18%**		**21.11%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	30,826	2,719	8.82%	18,007	58.41%	8,011	25.99%	23,264	75.47%	1,846	7.94%	14,282	61.39%	5,537	23.80%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.96%**	**7.20%**		**10.70%**		**3.67%**		**6.87%**		**7.02%**		**10.20%**		**3.54%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
12	67,913	6,754	9.95%	34,605	50.95%	22,827	33.61%	51,210	75.41%	4,541	8.87%	27,930	54.54%	15,731	30.72%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.33%**	**17.88%**		**20.56%**		**10.46%**		**15.13%**		**17.28%**		**19.95%**		**10.06%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
14	68,242	6,878	10.08%	40,933	59.98%	16,719	24.50%	55,030	80.64%	5,001	9.09%	35,060	63.71%	11,740	21.33%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.40%**	**18.21%**		**24.33%**		**7.66%**		**16.25%**		**19.03%**		**25.04%**		**7.51%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon [illegible]b Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	68,184	9,346	13.71%	23,610	34.63%	30,972	45.42%	51,032	74.84%	6,497	12.73%	19,782	38.76%	21,118	41.38%
8	72,280	4,128	5.71%	19,515	27.00%	46,871	64.85%	55,356	76.59%	2,897	5.23%	15,998	28.90%	34,923	63.09%
9	68,142	4,239	6.22%	20,943	30.73%	40,851	59.95%	51,806	76.03%	2,981	5.75%	17,803	34.36%	29,110	56.19%
10	67,964	3,024	4.45%	12,611	18.56%	51,581	75.89%	51,712	76.09%	2,092	4.05%	10,953	21.18%	37,968	73.42%
Total 7-10	276,570	20,737	7.50%	76,679	27.72%	170,275	61.57%	209,906	75.90%	14,467	6.89%	64,536	30.75%	123,119	58.65%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.42%**	**54.90%**		**45.57%**		**78.03%**		**62.00%**		**55.05%**		**46.09%**		**78.75%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	30,826	2,719	8.82%	18,007	58.41%	8,011	25.99%	23,264	75.47%	1,846	7.94%	14,282	61.39%	5,537	23.80%
12	67,913	6,754	9.95%	34,605	50.95%	22,827	33.61%	51,210	75.41%	4,541	8.87%	27,930	54.54%	15,731	30.72%
14	67,735	7,562	11.16%	38,984	57.55%	17,100	25.25%	54,170	79.97%	5,426	10.02%	33,277	61.43%	11,951	22.06%
Total 2,12,14	166,474	17,035	10.23%	91,596	55.02%	47,938	28.80%	128,644		11,813		75,489		33,219	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.58%**	**45.10%**		**54.43%**		**21.97%**		**38.00%**		**44.95%**		**53.91%**		**21.25%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	30,826	2,719	8.82%	18,007	58.41%	8,011	25.99%	23,264	75.47%	1,846	7.94%	14,282	61.39%	5,537	23.80%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.96%**	**7.20%**		**10.70%**		**3.67%**		**6.87%**		**7.02%**		**10.20%**		**3.54%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
12	67,913	6,754	9.95%	34,605	50.95%	22,827	33.61%	51,210	75.41%	4,541	8.87%	27,930	54.54%	15,731	30.72%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.33%**	**17.88%**		**20.56%**		**10.46%**		**15.13%**		**17.28%**		**19.95%**		**10.06%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
14	67,735	7,562	11.16%	38,984	57.55%	17,100	25.25%	54,170	79.97%	5,426	10.02%	33,277	61.43%	11,951	22.06%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.29%**	**20.02%**		**23.17%**		**7.84%**		**16.00%**		**20.65%**		**23.77%**		**7.64%**	

Note: NH = Not Hispanic; AP Blk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon [illegible]c Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	67,723	8,661	12.79%	22,804	33.67%	32,507	48.00%	50,280	74.24%	5,928	11.79%	19,169	38.12%	21,922	43.60%
8	72,280	4,128	5.71%	19,515	27.00%	46,871	64.85%	55,356	76.59%	2,897	5.23%	15,998	28.90%	34,923	63.09%
9	68,300	3,978	5.82%	25,119	36.78%	36,976	54.14%	53,976	79.03%	2,977	5.52%	22,044	40.84%	26,992	50.01%
10	67,469	3,040	4.51%	13,973	20.71%	49,585	73.49%	51,522	76.36%	2,103	4.08%	12,109	23.50%	36,501	70.85%
Total 7-10	275,772	19,807	7.18%	81,411	29.52%	165,939	60.17%	211,134	76.56%	13,905	6.59%	69,320	32.83%	120,338	57.00%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.24%**	**52.44%**		**48.38%**		**76.04%**		**62.36%**		**52.91%**		**49.51%**		**76.97%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	30,826	2,719	8.82%	18,007	58.41%	8,011	25.99%	23,264	75.47%	1,846	7.94%	14,282	61.39%	5,537	23.80%
12	67,913	6,754	9.95%	34,605	50.95%	22,827	33.61%	51,210	75.41%	4,541	8.87%	27,930	54.54%	15,731	30.72%
14	68,533	8,492	12.39%	34,252	49.98%	21,436	31.28%	52,942	77.25%	5,988	11.31%	28,493	53.82%	14,732	27.83%
Total 2,12,14	167,272	17,965	10.74%	86,864	51.93%	52,274	31.25%	127,416		12,375		70,705		36,000	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.76%**	**47.56%**		**51.62%**		**23.96%**		**37.64%**		**47.09%**		**50.49%**		**23.03%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	30,826	2,719	8.82%	18,007	58.41%	8,011	25.99%	23,264	75.47%	1,846	7.94%	14,282	61.39%	5,537	23.80%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.96%**	**7.20%**		**10.70%**		**3.67%**		**6.87%**		**7.02%**		**10.20%**		**3.54%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
12	67,913	6,754	9.95%	34,605	50.95%	22,827	33.61%	51,210	75.41%	4,541	8.87%	27,930	54.54%	15,731	30.72%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.33%**	**17.88%**		**20.56%**		**10.46%**		**15.13%**		**17.28%**		**19.95%**		**10.06%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
14	68,533	8,492	12.39%	34,252	49.98%	21,436	31.28%	52,942	77.25%	5,988	11.31%	28,493	53.82%	14,732	27.83%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.47%**	**22.48%**		**20.35%**		**9.82%**		**15.64%**		**22.79%**		**20.35%**		**9.42%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon Ila Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	68,465	4,398	6.42%	20,498	29.94%	41,832	61.10%	52,094	76.09%	3,095	5.94%	16,812	32.27%	30,691	58.91%
8	69,946	2,841	4.06%	12,193	17.43%	54,110	77.36%	53,781	76.89%	2,057	3.82%	10,897	20.26%	40,088	74.54%
9	67,703	8,704	12.86%	22,059	32.58%	33,254	49.12%	50,163	74.09%	5,960	11.88%	18,494	36.87%	22,499	44.85%
10	67,823	3,760	5.54%	24,616	36.29%	37,349	55.07%	53,379	78.70%	2,711	5.08%	21,397	40.09%	27,395	51.32%
Total 7-10	273,937	19,703	7.19%	79,366	28.97%	166,545	60.80%	209,417	76.45%	13,823	6.60%	67,600	32.28%	120,673	57.62%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**61.83%**	**52.16%**		**47.16%**		**76.32%**		**61.86%**		**52.60%**		**48.28%**		**77.19%**	
District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	68,590	8,495	12.39%	34,304	50.01%	21,436	31.25%	52,997	77.27%	5,990	11.30%	28,545	53.86%	14,732	27.80%
Total 2,12,14	169,107	18,069	10.68%	88,909	52.58%	51,668	30.55%	129,133		12,457		72,425		35,665	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**38.17%**	**47.84%**		**52.84%**		**23.68%**		**38.14%**		**47.40%**		**51.72%**		**22.81%**	
District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**7.43%**	**7.77%**		**11.41%**		**3.91%**		**7.33%**		**7.59%**		**10.86%**		**3.75%**	
District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	
District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
14	68,590	8,495	12.39%	34,304	50.01%	21,436	31.25%	52,997	77.27%	5,990	11.30%	28,545	53.86%	14,732	27.80%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.48%**	**22.49%**		**20.39%**		**9.82%**		**15.65%**		**22.79%**		**20.39%**		**9.42%**	

Note: NH = Not Hispanic; AP Blk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon Plan Fix Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	68,465	4,398	6.42%	20,498	29.94%	41,832	61.10%	52,094	76.09%	3,095	5.94%	16,812	32.27%	30,691	58.91%
8	69,193	2,796	4.04%	11,581	16.74%	54,025	78.08%	53,039	76.65%	2,012	3.79%	10,291	19.40%	40,008	75.43%
9	67,703	8,704	12.86%	22,059	32.58%	33,254	49.12%	50,163	74.09%	5,960	11.88%	18,494	36.87%	22,499	44.85%
10	68,576	3,805	5.55%	25,228	36.79%	37,434	54.59%	54,121	78.92%	2,756	5.09%	22,003	40.66%	27,475	50.77%
Total 7-10	273,937	19,703	7.19%	79,366	28.97%	166,545	60.80%	209,417	76.45%	13,823	6.60%	67,600	32.28%	120,673	57.62%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**61.83%**	**52.16%**		**47.16%**		**76.32%**		**61.86%**		**52.60%**		**48.28%**		**77.19%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	68,590	8,495	12.39%	34,304	50.01%	21,436	31.25%	52,997	77.27%	5,990	11.30%	28,545	53.86%	14,732	27.80%
Total 2,12,14	169,107	18,069	10.68%	88,909	52.58%	51,668	30.55%	129,133		12,457		72,425		35,665	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**38.17%**	**47.84%**		**52.84%**		**23.68%**		**38.14%**		**47.40%**		**51.72%**		**22.81%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**7.43%**	**7.77%**		**11.41%**		**3.91%**		**7.33%**		**7.59%**		**10.86%**		**3.75%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
14	68,590	8,495	12.39%	34,304	50.01%	21,436	31.25%	52,997	77.27%	5,990	11.30%	28,545	53.86%	14,732	27.80%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.48%**	**22.49%**		**20.39%**		**9.82%**		**15.65%**		**22.79%**		**20.39%**		**9.42%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon lb Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	72,940	4,890	6.70%	21,858	29.97%	44,115	60.48%	55,239	75.73%	3,432	6.21%	17,710	32.06%	32,331	58.53%
8	69,946	2,841	4.06%	12,193	17.43%	54,110	77.36%	53,781	76.89%	2,057	3.82%	10,897	20.26%	40,088	74.54%
9	67,703	8,704	12.86%	22,059	32.58%	33,254	49.12%	50,163	74.09%	5,960	11.88%	18,494	36.87%	22,499	44.85%
10	67,823	3,760	5.54%	24,616	36.29%	37,349	55.07%	53,379	78.70%	2,711	5.08%	21,397	40.09%	27,395	51.32%
Total 7-10	278,412	20,195	7.25%	80,726	29.00%	168,828	60.64%	212,562	76.35%	14,160	6.66%	68,498	32.22%	122,313	57.54%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.84%**	**53.47%**		**47.97%**		**77.37%**		**62.79%**		**53.88%**		**48.92%**		**78.24%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	68,590	8,495	12.39%	34,304	50.01%	21,436	31.25%	52,997	77.27%	5,990	11.30%	28,545	53.86%	14,732	27.80%
Total 2,12,14	164,632	17,577	10.68%	87,549	53.18%	49,385	30.00%	125,988		12,120		71,527		34,025	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.16%**	**46.53%**		**52.03%**		**22.63%**		**37.21%**		**46.12%**		**51.08%**		**21.76%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.42%**	**6.47%**		**10.60%**		**2.86%**		**6.40%**		**6.31%**		**10.21%**		**2.71%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
14	68,590	8,495	12.39%	34,304	50.01%	21,436	31.25%	52,997	77.27%	5,990	11.30%	28,545	53.86%	14,732	27.80%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.48%**	**22.49%**		**20.39%**		**9.82%**		**15.65%**		**22.79%**		**20.39%**		**9.42%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon lc Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	69,634	3,428	4.92%	14,394	20.67%	50,885	73.07%	53,289	76.53%	2,456	4.61%	12,682	23.80%	37,305	70.01%
8	73,252	4,303	5.87%	19,657	26.83%	47,340	64.63%	55,731	76.08%	3,033	5.44%	15,925	28.57%	35,114	63.01%
9	67,703	8,704	12.86%	22,059	32.58%	33,254	49.12%	50,163	74.09%	5,960	11.88%	18,494	36.87%	22,499	44.85%
10	67,823	3,760	5.54%	24,616	36.29%	37,349	55.07%	53,379	78.70%	2,711	5.08%	21,397	40.09%	27,395	51.32%
Total 7-10	278,412	20,195	7.25%	80,726	29.00%	168,828	60.64%	212,562	76.35%	14,160	6.66%	68,498	32.22%	122,313	57.54%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.84%**	**53.47%**		**47.97%**		**77.37%**		**62.79%**		**53.88%**		**48.92%**		**78.24%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	68,590	8,495	12.39%	34,304	50.01%	21,436	31.25%	52,997	77.27%	5,990	11.30%	28,545	53.86%	14,732	27.80%
Total 2,12,14	164,632	17,577	10.68%	87,549	53.18%	49,385	30.00%	125,988		12,120		71,527		34,025	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.16%**	**46.53%**		**52.03%**		**22.63%**		**37.21%**		**46.12%**		**51.08%**		**21.76%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.42%**	**6.47%**		**10.60%**		**2.86%**		**6.40%**		**6.31%**		**10.21%**		**2.71%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
14	68,590	8,495	12.39%	34,304	50.01%	21,436	31.25%	52,997	77.27%	5,990	11.30%	28,545	53.86%	14,732	27.80%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.48%**	**22.49%**		**20.39%**		**9.82%**		**15.65%**		**22.79%**		**20.39%**		**9.42%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon Ild Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	67,691	3,463	5.12%	16,287	24.06%	46,795	69.13%	51,992	76.81%	2,490	4.79%	14,198	27.31%	34,307	65.99%
8	70,720	3,776	5.34%	16,404	23.20%	49,147	69.50%	53,883	76.19%	2,662	4.94%	13,511	25.07%	36,472	67.69%
9	67,703	8,704	12.86%	22,059	32.58%	33,254	49.12%	50,163	74.09%	5,960	11.88%	18,494	36.87%	22,499	44.85%
10	67,823	3,760	5.54%	24,616	36.29%	37,349	55.07%	53,379	78.70%	2,711	5.08%	21,397	40.09%	27,395	51.32%
Total 7-10	273,937	19,703	7.19%	79,366	28.97%	166,545	60.80%	209,417	76.45%	13,823	6.60%	67,600	32.28%	120,673	57.62%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**61.83%**	**52.16%**		**47.16%**		**76.32%**		**61.86%**		**52.60%**		**48.28%**		**77.19%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	68,590	8,495	12.39%	34,304	50.01%	21,436	31.25%	52,997	77.27%	5,990	11.30%	28,545	53.86%	14,732	27.80%
Total 2,12,14	169,107	18,069	10.68%	88,909	52.58%	51,668	30.55%	129,133		12,457		72,425		35,665	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**38.17%**	**47.84%**		**52.84%**		**23.68%**		**38.14%**		**47.40%**		**51.72%**		**22.81%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**7.43%**	**7.77%**		**11.41%**		**3.91%**		**7.33%**		**7.59%**		**10.86%**		**3.75%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
14	68,590	8,495	12.39%	34,304	50.01%	21,436	31.25%	52,997	77.27%	5,990	11.30%	28,545	53.86%	14,732	27.80%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.48%**	**22.49%**		**20.39%**		**9.82%**		**15.65%**		**22.79%**		**20.39%**		**9.42%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon File Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	69,634	3,428	4.92%	14,394	20.67%	50,885	73.07%	53,289	76.53%	2,456	4.61%	12,682	23.80%	37,305	70.01%
8	73,252	4,303	5.87%	19,657	26.83%	47,340	64.63%	55,731	76.08%	3,033	5.44%	15,925	28.57%	35,114	63.01%
9	67,801	8,517	12.56%	21,416	31.59%	34,329	50.63%	50,064	73.84%	5,857	11.70%	17,934	35.82%	23,202	46.34%
10	67,801	3,911	5.77%	25,151	37.10%	36,496	53.83%	53,455	78.84%	2,786	5.21%	21,879	40.93%	26,770	50.08%
Total 7-10	278,488	20,159	7.24%	80,618	28.95%	169,050	60.70%	212,539	76.32%	14,132	6.65%	68,420	32.19%	122,391	57.59%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.86%**	**53.37%**		**47.91%**		**77.47%**		**62.78%**		**53.77%**		**48.86%**		**78.29%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	68,514	8,531	12.45%	34,412	50.23%	21,214	30.96%	53,020	77.39%	6,018	11.35%	28,623	53.99%	14,654	27.64%
Total 2,12,14	164,556	17,613	10.70%	87,657	53.27%	49,163	29.88%	126,011		12,148		71,605		33,947	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.14%**	**46.63%**		**52.09%**		**22.53%**		**37.22%**		**46.23%**		**51.14%**		**21.71%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.42%**	**6.47%**		**10.60%**		**2.86%**		**6.40%**		**6.31%**		**10.21%**		**2.71%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
14	68,514	8,531	12.45%	34,412	50.23%	21,214	30.96%	53,020	77.39%	6,018	11.35%	28,623	53.99%	14,654	27.64%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.46%**	**22.59%**		**20.45%**		**9.72%**		**15.66%**		**22.90%**		**20.44%**		**9.37%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon le Fix Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	67,891	3,309	4.87%	13,725	20.22%	49,963	73.59%	51,707	76.16%	2,341	4.53%	12,023	23.25%	36,522	70.63%
8	73,252	4,303	5.87%	19,657	26.83%	47,340	64.63%	55,731	76.08%	3,033	5.44%	15,925	28.57%	35,114	63.01%
9	67,801	8,517	12.56%	21,416	31.59%	34,329	50.63%	50,064	73.84%	5,857	11.70%	17,934	35.82%	23,202	46.34%
10	69,544	4,030	5.79%	25,820	37.13%	37,418	53.80%	55,037	79.14%	2,901	5.27%	22,538	40.95%	27,553	50.06%
Total 7-10	278,488	20,159	7.24%	80,618	28.95%	169,050	60.70%	212,539	76.32%	14,132	6.65%	68,420	32.19%	122,391	57.59%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.86%**	**53.37%**		**47.91%**		**77.47%**		**62.78%**		**53.77%**		**48.86%**		**78.29%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	68,514	8,531	12.45%	34,412	50.23%	21,214	30.96%	53,020	77.39%	6,018	11.35%	28,623	53.99%	14,654	27.64%
Total 2,12,14	164,556	17,613	10.70%	87,657	53.27%	49,163	29.88%	126,011		12,148		71,605		33,947	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.14%**	**46.63%**		**52.09%**		**22.53%**		**37.22%**		**46.23%**		**51.14%**		**21.71%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.42%**	**6.47%**		**10.60%**		**2.86%**		**6.40%**		**6.31%**		**10.21%**		**2.71%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
14	68,514	8,531	12.45%	34,412	50.23%	21,214	30.96%	53,020	77.39%	6,018	11.35%	28,623	53.99%	14,654	27.64%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.46%**	**22.59%**		**20.45%**		**9.72%**		**15.66%**		**22.90%**		**20.44%**		**9.37%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Maroon [illegible]lf Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	67,691	3,463	5.12%	16,287	24.06%	46,795	69.13%	51,992	76.81%	2,490	4.79%	14,198	27.31%	34,307	65.99%
8	70,720	3,776	5.34%	16,404	23.20%	49,147	69.50%	53,883	76.19%	2,662	4.94%	13,511	25.07%	36,472	67.69%
9	67,801	8,517	12.56%	21,416	31.59%	34,329	50.63%	50,064	73.84%	5,857	11.70%	17,934	35.82%	23,202	46.34%
10	67,801	3,911	5.77%	25,151	37.10%	36,496	53.83%	53,455	78.84%	2,786	5.21%	21,879	40.93%	26,770	50.08%
Total 7-10	274,013	19,667	7.18%	79,258	28.92%	166,767	60.86%	209,394	76.42%	13,795	6.59%	67,522	32.25%	120,751	57.67%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**61.85%**	**52.07%**		**47.10%**		**76.42%**		**61.85%**		**52.49%**		**48.22%**		**77.24%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	68,514	8,531	12.45%	34,412	50.23%	21,214	30.96%	53,020	77.39%	6,018	11.35%	28,623	53.99%	14,654	27.64%
Total 2,12,14	169,031	18,105	10.71%	89,017	52.66%	51,446	30.44%	129,156		12,485		72,503		35,587	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**38.15%**	**47.93%**		**52.90%**		**23.58%**		**38.15%**		**47.51%**		**51.78%**		**22.76%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	32,932	2,935	8.91%	19,201	58.30%	8,523	25.88%	24,826	75.39%	1,995	8.04%	15,201	61.23%	5,870	23.64%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**7.43%**	**7.77%**		**11.41%**		**3.91%**		**7.33%**		**7.59%**		**10.86%**		**3.75%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
14	68,514	8,531	12.45%	34,412	50.23%	21,214	30.96%	53,020	77.39%	6,018	11.35%	28,623	53.99%	14,654	27.64%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.46%**	**22.59%**		**20.45%**		**9.72%**		**15.66%**		**22.90%**		**20.44%**		**9.37%**	

Note: NH = Not Hispanic; AP Blk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Orange Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	68,898	3,489	5.06%	22,338	32.42%	41,476	60.20%	54,770	79.49%	2,576	4.70%	20,044	36.60%	30,729	56.11%
8	67,872	4,176	6.15%	18,432	27.16%	43,483	64.07%	51,719	76.20%	2,933	5.67%	15,152	29.30%	32,116	62.10%
9	67,726	3,632	5.36%	16,308	24.08%	46,310	68.38%	51,171	75.56%	2,508	4.90%	13,758	26.89%	33,522	65.51%
10	67,879	9,822	14.47%	25,454	37.50%	28,127	41.44%	50,959	75.07%	6,810	13.36%	21,043	41.29%	19,259	37.79%
Total 7-10	272,375	21,119	7.75%	82,532	30.30%	159,396	58.52%	208,619	76.59%	14,827	7.11%	69,997	33.55%	115,626	55.42%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**61.48%**	**55.91%**		**49.05%**		**73.05%**		**61.62%**		**56.42%**		**49.99%**		**73.96%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,690	2,466	8.60%	16,755	58.40%	7,512	26.18%	21,640	75.43%	1,663	7.68%	13,305	61.48%	5,180	23.94%
12	70,049	5,386	7.69%	36,958	52.76%	24,266	34.64%	53,429	76.27%	3,631	6.80%	29,852	55.87%	17,146	32.09%
14	71,930	8,801	12.24%	32,030	44.53%	27,039	37.59%	54,862	76.27%	6,159	11.23%	26,871	48.98%	18,386	33.51%
Total 2,12,14	170,669	16,653	9.76%	85,743	50.24%	58,817	34.46%	129,931		11,453		70,028		40,712	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**38.52%**	**44.09%**		**50.95%**		**26.95%**		**38.38%**		**43.58%**		**50.01%**		**26.04%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
2 (NW Part)	28,690	2,466	8.60%	16,755	58.40%	7,512	26.18%	21,640	75.43%	1,663	7.68%	13,305	61.48%	5,180	23.94%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.48%**	**6.53%**		**9.96%**		**3.44%**		**6.39%**		**6.33%**		**9.50%**		**3.31%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
12	70,049	5,386	7.69%	36,958	52.76%	24,266	34.64%	53,429	76.27%	3,631	6.80%	29,852	55.87%	17,146	32.09%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.81%**	**14.26%**		**21.96%**		**11.12%**		**15.78%**		**13.82%**		**21.32%**		**10.97%**	
District	**Population**	**Hisp**	**Hisp%**	**NHWht**	**NHWht%**	**APBlk**	**APBlk%**	**VAP**	**VAP%**	**HVAP**	**HVAP%**	**WVAP**	**WVAP%**	**APBVAP**	**APBVAP%**
14	71,930	8,801	12.24%	32,030	44.53%	27,039	37.59%	54,862	76.27%	6,159	11.23%	26,871	48.98%	18,386	33.51%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**16.24%**	**23.30%**		**19.03%**		**12.39%**		**16.20%**		**23.44%**		**19.19%**		**11.76%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Plaintiff's Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	68,007	3,942	5.80%	28,104	41.33%	33,879	49.82%	55,041	80.93%	2,973	5.40%	24,991	45.40%	25,220	45.82%
8	68,881	4,815	6.99%	21,948	31.86%	40,007	58.08%	52,115	75.66%	3,385	6.50%	17,812	34.18%	29,119	55.87%
9	68,150	3,961	5.81%	15,848	23.25%	46,728	68.57%	50,581	74.22%	2,672	5.28%	13,196	26.09%	33,278	65.79%
10	72,532	4,221	5.82%	28,228	38.92%	37,410	51.58%	55,384	76.36%	2,775	5.01%	22,804	41.17%	27,630	49.89%
Total 7-10	277,570	16,939	6.10%	94,128	33.91%	158,024	56.93%	213,121	76.78%	11,805	5.54%	78,803	36.98%	115,247	54.08%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.65%**	**44.85%**		**55.94%**		**72.42%**		**62.95%**		**44.92%**		**56.28%**		**73.72%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
12	67,840	9,807	14.46%	25,444	37.51%	28,121	41.45%	50,938	75.09%	6,802	13.35%	21,037	41.30%	19,258	37.81%
14	69,177	8,583	12.41%	30,862	44.61%	25,828	37.34%	52,810	76.34%	6,015	11.39%	25,882	49.01%	17,603	33.33%
Total 2,12,14	165,474	20,833	12.59%	74,147	44.81%	60,189	36.37%	125,429		14,475		61,222		41,091	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.35%**	**55.15%**		**44.06%**		**27.58%**		**37.05%**		**55.08%**		**43.72%**		**26.28%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.42%**	**6.47%**		**10.60%**		**2.86%**		**6.40%**		**6.31%**		**10.21%**		**2.71%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
12	67,840	9,807	14.46%	25,444	37.51%	28,121	41.45%	50,938	75.09%	6,802	13.35%	21,037	41.30%	19,258	37.81%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.31%**	**25.96%**		**15.12%**		**12.89%**		**15.05%**		**25.88%**		**15.02%**		**12.32%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
14	69,177	8,583	12.41%	30,862	44.61%	25,828	37.34%	52,810	76.34%	6,015	11.39%	25,882	49.01%	17,603	33.33%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.61%**	**22.72%**		**18.34%**		**11.84%**		**15.60%**		**22.89%**		**18.48%**		**11.26%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Plaintiff's Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	70,007	4,067	5.81%	33,069	47.24%	30,553	43.64%	57,001	81.42%	3,091	5.42%	28,791	50.51%	23,110	40.54%
8	68,881	4,815	6.99%	21,948	31.86%	40,007	58.08%	52,115	75.66%	3,385	6.50%	17,812	34.18%	29,119	55.87%
9	68,190	5,633	8.26%	21,154	31.02%	38,824	56.94%	50,696	74.35%	3,834	7.56%	17,768	35.05%	26,772	52.81%
10	70,028	2,528	3.61%	16,639	23.76%	49,763	71.06%	53,135	75.88%	1,630	3.07%	13,817	26.00%	36,783	69.23%
Total 7-10	277,106	17,043	6.15%	92,810	33.49%	159,147	57.43%	212,947	76.85%	11,940	5.61%	78,188	36.72%	115,784	54.37%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**62.55%**	**45.12%**		**55.15%**		**72.93%**		**62.90%**		**45.43%**		**55.84%**		**74.06%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
12	68,895	7,863	11.41%	31,714	46.03%	24,854	36.08%	52,042	75.54%	5,355	10.29%	25,746	49.47%	17,303	33.25%
14	68,586	10,423	15.20%	25,910	37.78%	27,972	40.78%	51,880	75.64%	7,327	14.12%	21,788	42.00%	19,021	36.66%
Total 2,12,14	165,938	20,729	12.49%	75,465	45.48%	59,066	35.60%	125,603		14,340		61,837		40,554	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**37.45%**	**54.88%**		**44.85%**		**27.07%**		**37.10%**		**54.57%**		**44.16%**		**25.94%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.42%**	**6.47%**		**10.60%**		**2.86%**		**6.40%**		**6.31%**		**10.21%**		**2.71%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
12	68,895	7,863	11.41%	31,714	46.03%	24,854	36.08%	52,042	75.54%	5,355	10.29%	25,746	49.47%	17,303	33.25%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.55%**	**20.82%**		**18.85%**		**11.39%**		**15.37%**		**20.38%**		**18.39%**		**11.07%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
14	68,586	10,423	15.20%	25,910	37.78%	27,972	40.78%	51,880	75.64%	7,327	14.12%	21,788	42.00%	19,021	36.66%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**15.48%**	**27.59%**		**15.40%**		**12.82%**		**15.32%**		**27.88%**		**15.56%**		**12.17%**	

Note: NH = Not Hispanic; APBlk = Any Part Black

Jacksonville, FL

NW Jacksonville Comparison

Plaintiff's 3 Plan

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
7	68,237	4,070	5.96%	33,536	49.15%	28,226	41.36%	55,963	82.01%	3,096	5.53%	29,159	52.10%	21,616	38.63%
8	67,903	4,784	7.05%	21,702	31.96%	39,330	57.92%	51,315	75.57%	3,357	6.54%	17,581	34.26%	28,597	55.73%
9	68,590	6,732	9.81%	23,570	34.36%	35,426	51.65%	50,799	74.06%	4,534	8.93%	19,821	39.02%	23,831	46.91%
10	67,700	2,017	2.98%	7,323	10.82%	57,878	85.49%	50,809	75.05%	1,321	2.60%	6,274	12.35%	42,777	84.19%
Total 7-10	272,430	17,603	6.46%	86,131	31.62%	160,860	59.05%	208,886	76.68%	12,308	5.89%	72,835	34.87%	116,821	55.93%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 7-10%	**61.49%**	**46.60%**		**51.18%**		**73.72%**		**61.70%**		**46.83%**		**52.02%**		**74.72%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
14	74,572	11,087	14.87%	28,899	38.75%	29,404	39.43%	56,673	76.00%	7,842	13.84%	24,208	42.72%	20,224	35.69%
Total 2,12,14	170,614	20,169	11.82%	82,144	48.15%	57,353	33.62%	129,664		13,972		67,190		39,517	
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW),12,14%	**38.51%**	**53.40%**		**48.82%**		**26.28%**		**38.30%**		**53.17%**		**47.98%**		**25.28%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
2 (NW Part)	28,457	2,443	8.58%	17,841	62.69%	6,240	21.93%	21,681	76.19%	1,658	7.65%	14,303	65.97%	4,230	19.51%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 2 (NW Part)%	**6.42%**	**6.47%**		**10.60%**		**2.86%**		**6.40%**		**6.31%**		**10.21%**		**2.71%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
12	67,585	6,639	9.82%	35,404	52.38%	21,709	32.12%	51,310	75.92%	4,472	8.72%	28,679	55.89%	15,063	29.36%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 12%	**15.25%**	**17.58%**		**21.04%**		**9.95%**		**15.16%**		**17.02%**		**20.48%**		**9.63%**	

District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%	VAP	VAP%	HVAP	HVAP%	WVAP	WVAP%	APBVAP	APBVAP%
14	74,572	11,087	14.87%	28,899	38.75%	29,404	39.43%	56,673	76.00%	7,842	13.84%	24,208	42.72%	20,224	35.69%
NW Jacksonville	443,044	37,772	8.53%	168,275	37.98%	218,213	49.25%	338,550	76.41%	26,280	7.76%	140,025	41.36%	156,338	46.18%
Dist 14%	**16.83%**	**29.35%**		**17.17%**		**13.47%**		**16.74%**		**29.84%**		**17.29%**		**12.94%**	

Note: NH = Not Hispanic; AP Blk = Any Part Black

Appendix B13

Table of Summary of the Demographics of People Moved
from Districts 7-10 in the Enjoined into
Districts 2, 12, 14 in the 2022-800 Plan

Jacksonville, FL

Population Moved

From Enjoined to 2022-800 Plan

Enjoined From District	To 2022-800 District	Population	Hisp	Hisp%	NHWht	NHWht%	APBlk	APBlk%
7	2	1,012	141	13.93%	428	42.29%	387	38.24%
8	12	6,812	258	3.79%	5,090	74.72%	1,095	16.07%
9	14	11,541	1,391	12.05%	4,286	37.14%	5,358	46.43%
10	12	5,995	678	11.31%	2,281	38.05%	2,625	43.79%
10	14	322	30	9.32%	156	48.45%	114	35.40%
Total Moved		25,682	2,498	9.73%	12,241	47.66%	9,579	37.30%

Note: NH = Not Hispanic; AP Black = Any Parts Black

Appendix B14

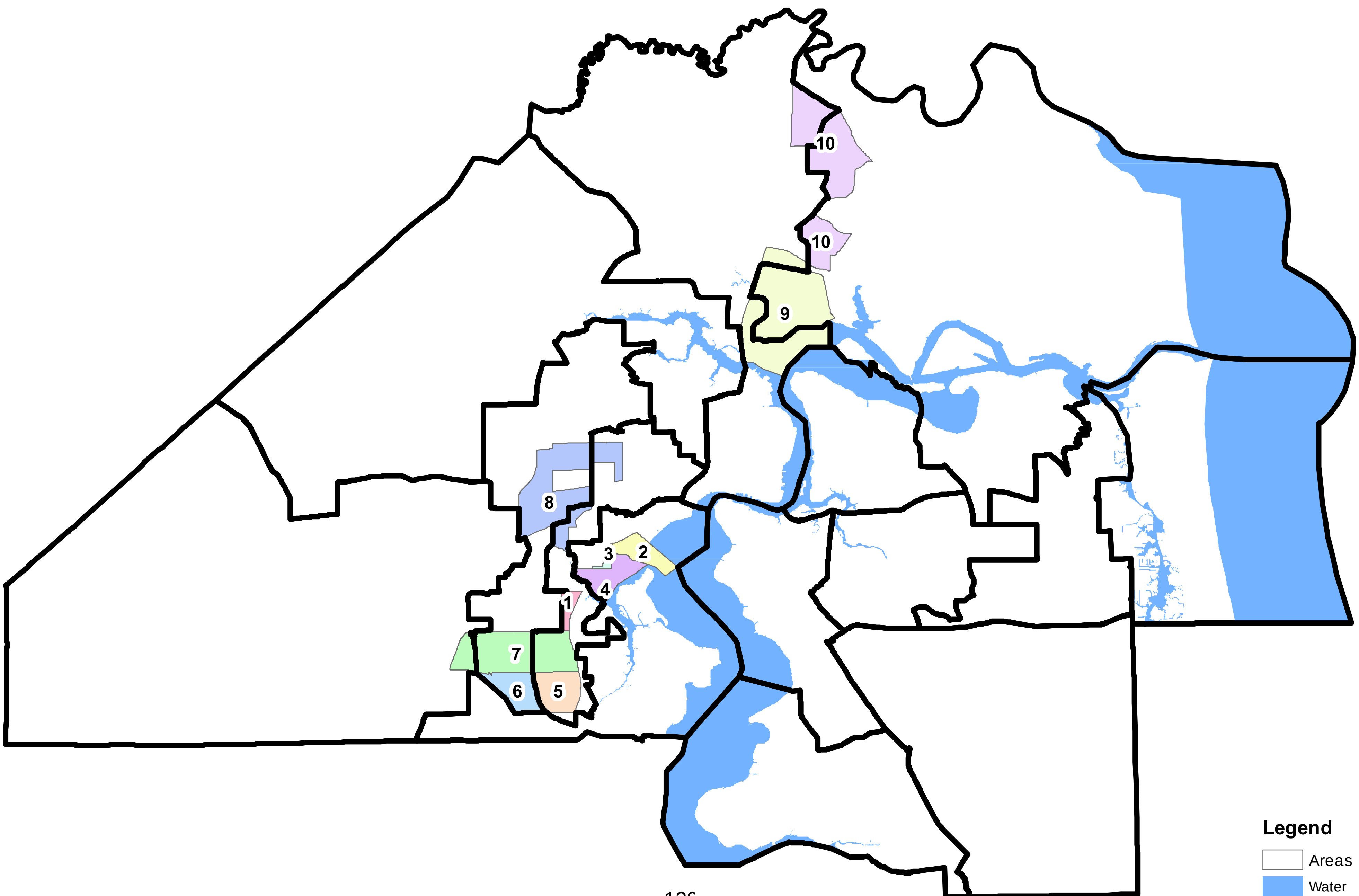
Map of Border Areas

Table Including Border Areas Analysis Data

Jacksonville, FL

Enjoined Plan

w/Border Areas Moved



Jacksonville, FL

Border Area Analysis

Population of Areas Moved

District	Population	Hispanic	Hispanic%	NHWht	NHWht%	APBlk	APBlk%
1 Portion of Cedar Hills moved from 9 to 14	2,214	248	11.20%	1,143	51.63%	674	30.44%
2 Portion of Avondale moved from 14 to 10	3,077	227	7.38%	2,582	83.91%	106	3.44%
3 Portion of Biltmore moved from 14 to 10	464	53	11.42%	288	62.07%	101	21.77%
4 Lakeshore and Fairfax area not moved out of 14 and into 10	4,662	335	7.19%	3,630	77.86%	405	8.69%
5 First Argyle area not moved out of 9 and into 14	7,362	1,361	18.49%	2,163	29.38%	3,160	42.92%
6 Second Argyle area not moved out of 9 and into 14	2,660	439	16.50%	993	37.33%	1,041	39.14%
7 Remainder of Argyle that stayed in 9	17,549	2,412	13.74%	5,462	31.12%	8,668	49.39%
8 Areas moved from 10 into 9	9,684	692	7.15%	2,985	30.82%	5,761	59.49%
9 San Mateo area moved into 2	4,340	392	9.03%	2,773	63.89%	943	21.73%
10 Oceanway/Yellow Bluff area moved out of 2	8,815	884	10.03%	4,133	46.89%	3,226	36.60%

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

JACKSONVILLE BRANCH OF THE NAACP, et al.,

Plaintiffs,

v.

CITY OF JACKSONVILLE, et al.,

Defendants.

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

EXPERT REPORT
Kosuke Imai, Ph.D.
November 16, 2022

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EXPERT REPORT

I. INTRODUCTION AND SCOPE OF WORK

1. My name is Kosuke Imai, Ph.D., and I am a Professor in the Department of Government and the Department of Statistics at Harvard University. I specialize in the development of statistical methods and computational algorithms for and their applications to social science research. I am also affiliated with Harvard's Institute for Quantitative Social Science. My qualifications and compensation are described in my initial report (hereafter "initial report") that was submitted to this court on July 21, 2022.

2. I have been asked by counsel representing the plaintiffs in this case to analyze relevant data and provide my expert opinions related to whether Black voters, who live in Districts 7, 8, 9, and 10 under the three alternative plans proposed by the plaintiffs (hereafter "proposed plans"), would be able to elect the candidate of their choice.[1] To do so, I first analyze the official election data to determine whether or not voting is racially polarized in Jacksonville. This new racially polarized voting (RPV) analysis updates the RPV analysis presented in my initial report by using the official results of all available city-wide elections from 2014 to 2022 that are contested by both Democratic and Republican parties and resulted in a winner.[2] Using the same set of the 31 city-wide election results, I then evaluate the partisanship of these four districts to determine whether Black voters who live in these districts would be able to elect the candidate of their choice.

II. SUMMARY OF OPINIONS

3. My analysis yields the following findings:

- My RPV analysis shows that Black voters in Jacksonville overwhelmingly support Democratic candidates whereas White voters disproportionately support Republican candidates. This analysis confirms the conclusion of the RPV analysis presented in my initial expert report that voting is racially polarized in Jacksonville.

- My partisan analysis shows that the four districts with the highest BVAP proportions lean

1. These four districts have the highest Black voting age population (BVAP) proportions under the proposed plans.
2. This comprehensive election set consists of 14 new elections in addition to the 17 elections analyzed in my initial report.

strongly towards the Democratic party under each of the three proposed plans. Together with the results of my RPV analysis, this finding implies that Black voters in these districts would be able to elect the candidate of their choice with a high probability.

III. RACIALLY POLARIZED VOTING ANALYSIS

4. I first conduct a RPV analysis by applying a standard ecological inference methodology to the total of 31 city-wide election results, updating the RPV analysis presented in my initial expert report. The details of this methodology are described in Appendix C of the initial report. Figure 1 updates the corresponding figure in the initial report by adding the results of 14 new elections (see Figure 1 of the initial report). These results confirm the conclusion of my initial RPV analysis that voting is racially polarized in Jacksonville. In fact, adding 14 new elections hardly changes the overall estimates of my initial RPV analysis. Overall, more than 90% of Black voters are estimated to support Democratic candidates while only about a quarter of White voters do so, with the difference of approximately 65 percentage points. Thus, my new RPV analysis clearly shows that in Jacksonville Black voters overwhelmingly support Democratic candidates whereas White voters disproportionately support Republican candidates.

IV. PARTISANSHIP ANALYSIS

5. Given the above results of the RPV analysis, I next evaluate the partisanship of the four districts whose BVAP proportions are among the highest under each of the three proposed plans (hereafter "P1", "P2", and "P3"). To do this, I simply aggregate the official election results for each district of a given proposed plan, and count the number of elections (out of the 31 elections) where a Democratic candidate would have won that district. Since the election results are only available at the precinct level, if a proposed plan splits a precinct I distribute Democratic and Republican votes across Census blocks, proportional to their voting age population.

6. Table 1 presents the results of my partisanship analysis, showing, for example, that under P1, a Democratic candidate would have won District 10 in 29 out of the 31 elections. My analysis shows that under all three proposed plans, Democratic candidates are highly likely to

EXPERT REPORT

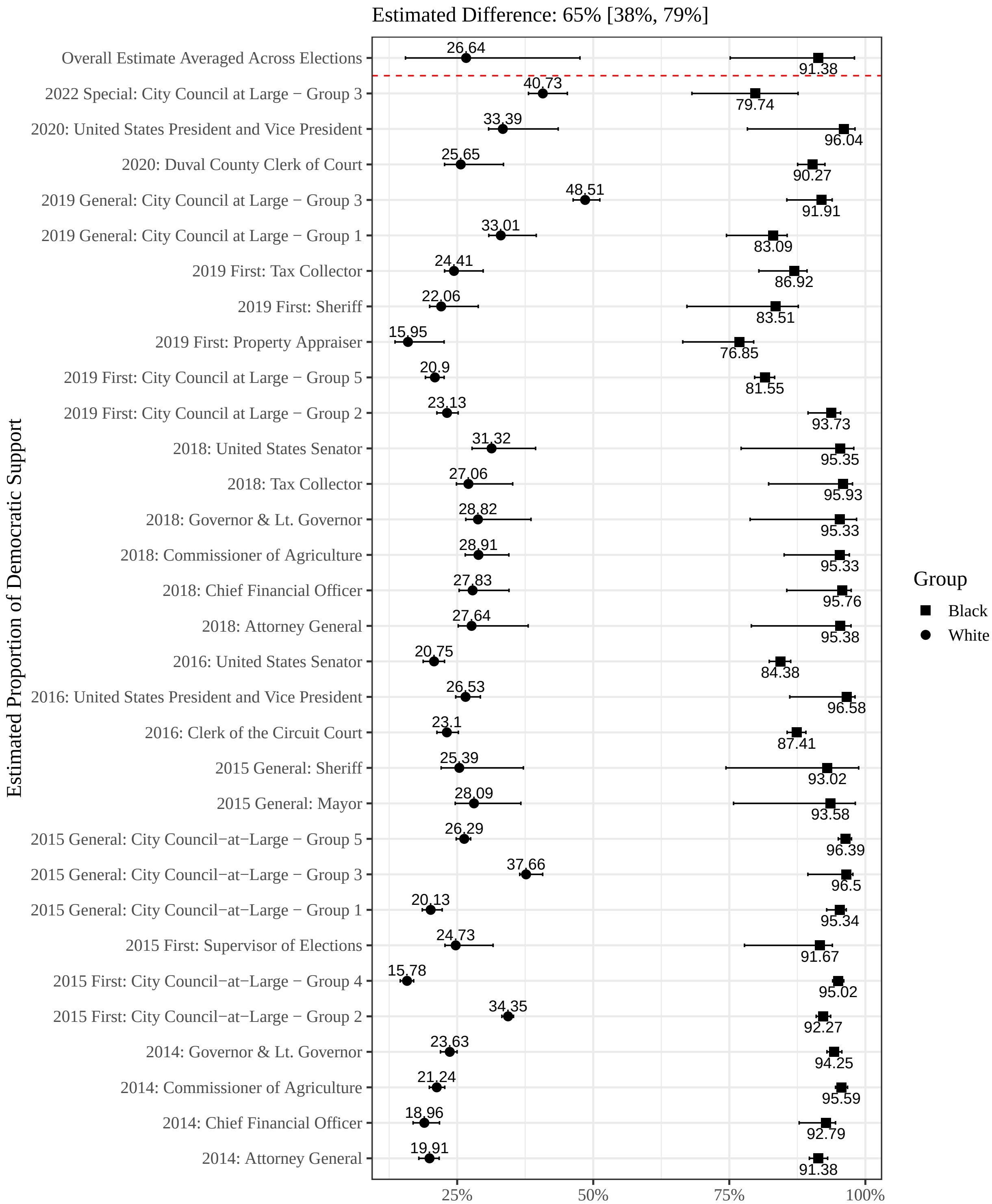


Figure 1: Estimated proportions of Democratic support among Black and White voters for a given election. Each dot denotes a point estimate whereas a horizontal line represents its associated 95 percent credible interval. The results imply a high degree of racially polarized voting in Jacksonville with Black voters (solid squares) overwhelmingly supporting Democratic candidates and White voters (solid circles) disproportionately supporting non-Democratic candidates.

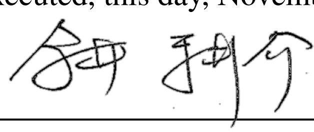
Table 1: Frequency of Democratic Wins out of 31 City-wide Elections under Each Proposed Plan.

Proposed plan	District 7	District 8	District 9	District 10
P1	31	31	31	29
P2	30	31	29	31
P3	28	31	24	31

win in these four districts. For P1 and P2, the proportion of Democratic victory among the 31 elections exceeds 90% for all four districts. For P3, the proportion of Democratic wins in District 9 is only slightly above 75%. But, even in this case, 5 out of the 7 elections where Democratic candidate received fewer votes than the Republican candidate, the two-party share of Democratic vote exceeds 46%, suggesting that the probability of Democratic victory is reasonably high. In conclusion, my analysis shows that under the proposed plans Black voters in these four districts would be able to elect the candidate of their choice with a high probability.

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

Executed, this day, November 16, 2022, in Cambridge, Massachusetts.



Kosuke Imai, Ph.D.

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.
_________________________________/

November 18, 2022

EXPERT REPORT OF DR. SHARON AUSTIN

I. Introduction

1. I am a Professor of Political Science at the University of Florida, Gainesville. I provided a full list of my qualifications in my first expert report in this case, dated July 21, 2022.

2. I have been asked by counsel to prepare an expert report on the Voting Rights Act ("VRA") Section 2 Totality of Circumstances ("ToC") test. The ToC test, along with the *Gingles factors*, examines several criteria to determine whether there is sufficient evidence that minority voters have experienced a history of discrimination in voting and other areas such as education, employment, and health. I set out in this report my findings with respect to each of the seven Senate factors ("SF") that are a part of this test and two of the three additional factors considered by the 11th Circuit.

3. To prepare this report, I examined primary and secondary historical sources, contemporaneous news articles, and drew on my own experience and knowledge. These methods are typical for this type of analysis.

4. I am being compensated $250 per hour for my work on this report. My compensation is not dependent on the outcome of my expert work or this case.

II. Summary

5. I find that Black voters in Florida generally (as well as in Jacksonville specifically) have experienced discrimination throughout the state's history. In addition, evidence of racially polarized voting continues to be apparent in Jacksonville and Jacksonville's citizens and their neighborhoods continue to be among the most disadvantaged in the city.

III. Detailed Findings

SF1: the extent of any history of official discrimination in the state or political subdivision that touched the right of the members of the minority group to register, to vote, or otherwise to participate in the democratic process.

6. When discussing SF1, I will provide an overview of the following:

- The history of voting discrimination and opposition to Black voting from the 1800s to the mid-1960s in Florida.
- The efforts of state political actors to dilute the Black vote in Florida after the ratification of the Voting Rights Act.
- The creation of "election reform" campaigns that target alleged "voter fraud" as an excuse to draft laws that discriminate against Black voters in Florida.
- The most recent evidence of voting discrimination during the November 8, 2022 mid-term elections in Florida. A veteran African American lawmaker, U.S. Representative Al Lawson (D.-Florida), was defeated when seeking re-election because of a discriminatory congressional map drawn by the governor.

- I will provide an overview of this historical discrimination against Black voters throughout the state's entire history. This discrimination continues to make it difficult for African Americans to both vote and elect their preferred representatives in the state of Florida.

THE HISTORY OF VOTING DISCRIMINATION AND OPPOSITION TO BLACK VOTING FROM THE 1800s TO THE MID-1960s

7. "Florida, the third state to secede from the Union in 1861, has a long history of racial discrimination in politics." (Kousser Report 2020, ¶ 26). During Reconstruction, the state expanded its felon disenfranchisement laws primarily to prevent Black men from voting (Brennan Center for Justice 2022).

8. In 1866 the Florida legislature was described as being "bigoted, vindictive, and shortsighted" when it enacted Black Codes which heavily restricted Black civil and voting rights (Richardson 1969, 365).

9. In 1885, Florida adopted a new Constitution as a "white supremacy document." (Paulson 2013c). The 1885 Constitution and the laws passed by the legislature thereafter erected multiple barriers to Black voting and was in effect until 1968. (Kousser 1974, 40).

10. As a result of the new Constitution and other suppressive election laws, Black turnout in the state dropped from 62% in the 1888 gubernatorial race to an estimated 11% in 1892. This legislature passed a poll tax and an "eight-box" law (a form of literacy test) as additional precautions to further disenfranchise Black voters (Kousser Report, ¶ 27.).

11. Beginning in 1892, Florida's white primary excluded Black voters from participating in

Democratic primaries until their exclusion was invalidated by the Supreme Court in the 1944 *Smith v. Allwright case.* (Paulson 2013a) During this time, the winners of Democratic primaries in the "one-party South" usually won elections. (Paulson 2013a).

12. "Despite being the most urbanized Southern State with the most Northern immigrants by 1920, Florida remained a segregated, largely one-party plutocracy until the early 1960s." (Kousser Report, ¶ 10).

13. Violent tactics and an environment of terror prevented Black people from voting for several decades. In one of the most egregious incidents in 1920 in Ocoee, Florida, a man was lynched, at least 50 people were murdered, and mostly all of the homes and churches owned by African Americans were destroyed and set afire after a black man attempted to vote earlier that day (Zinn Education Project 2022).

14. Despite these threats, some Black people were able to register and vote. By 1940, as few as 6% of Black Floridians were registered to vote. By 1947, the statewide Black voter registration rate increased to 16%. (Klas 2016).

15. "Once Blacks could vote, they found their way to exercising political power in Florida blocked by such devices as at-large elections, which were widely and successfully attacked with Section 2 lawsuits in the 1980s." (Kousser Report, ¶ 10).

16. "But the State continued to pass laws, such as restrictions on early voting, and failed to provide election materials in Spanish." (*Id*.).

17. "Attempts to end the process of disfranchisement of former felons foundered in the courts. Although the executive clemency process was liberalized under Governors Reubin Askew and Bob Graham from 1975 through 1988, more easily restoring the rights of former prisoners to vote, clemency was at the whim of any governor, and rights restoration slowed markedly from 1989

through 2002, and even more dramatically, from 2011 through the present." (Kousser Report ¶ 11).

18. "A successful amendment of the State Constitution in 2018, which aimed to allow former felons to vote much more easily, was severely undercut by the 2019 passage of S.B.7066." (Kousser Report ¶ 11).

THE EFFORTS OF STATE POLITICAL ACTORS TO DILUTE THE BLACK VOTE AFTER THE RATIFICATION OF THE VOTING RIGHTS ACT

19. In 1968, the Florida legislature amended the state Constitution to guarantee equal voting rights for all citizens and fair elections (Article VI, Constitution 1968).

20. In 1968, the state legislature drafted its first new constitution since 1885. (Wood 2016, 7). The 1885 Constitution had banned slavery in section 19 of its "Declaration of Rights" but made no mention of either race or racial discrimination. (Florida Constitution Revision Commission 2021). The 1968 Constitution stipulated that "All natural persons, female and male alike, are equal before the law and have inalienable rights. . . . No person shall be deprived of any right because of race, religion, national origin, or physical disability." (Article I, § 2, Florida Constitution, 1968).

21. The Black voter registration rate increased significantly after the Voting Rights Act went into effect. By 1971, the statewide Black voter registration percentage had grown to almost 60% (Southern Oral History Program 2021).

22. During this period, Black Floridians won their first elected offices since Josiah T. Walls and Henry Harmon won state legislative seats and served from 1868 to 1870. (Brown Jr. 1998; Young 2006). In 1968, Joe Lang Kershaw became the first African American elected to the state House since Reconstruction (Kral 1999) followed in 1970, by Gwen Cherry, the first Black female state House member (Gwen S. Cherry Black Women Lawyers Association 2021).

23. After the percentages of registered minority voters increased, Black and Hispanic citizens wanted to continue electing people of color to major offices, but had to challenge legislative efforts to dilute their votes.

24. The 1968 state constitution required redistricting two years after every census and approval of new districts from the Florida Supreme Court. (Isbell 2021a). Beginning in 1970 and for every subsequent decade thereafter, the legislature attempted to draw districts to prevent Florida's Black and Hispanic citizens from electing minority representatives. Blacks and Hispanics had to fight "for representation in the map-drawing process." (*Id.*).

25. Black voters and Republicans unsuccessfully challenged the newly-drawn 1970 districts in the *Wolfson v. Nearing* case. They accused the legislature of both racial and partisan gerrymandering and argued that "gerrymandering and multimember districts are used with discriminatory effect so as to cancel out or minimize the votes of racial and political elements of the constituency." (*Wolfson v. Nearing*, 346 F. Supp. 799 (1972)). The plaintiffs specifically pointed to the drawing of districts in Gadsden, Broward, Dade, Duval, and Polk Counties. Plaintiffs alleged that districts were drawn in such a way that Gadsden (where Blacks outnumbered whites) was combined with surrounding predominantly white counties to prevent the election of Black representatives. Moreover, in Broward, Dade, and Duval, "readily identifiable black ghetto areas" were not placed in the same district which would have allowed Black voters to elect Black representatives of choice. (*Wolfson* 1972).

26. As a result, other southern states (Alabama, Georgia, Tennessee, South Carolina, Louisiana, Texas, North Carolina, Arkansas, and Mississippi) had elected more Black state representatives than Florida by 1977. (Isbell 2021a). In 1977, Florida's 160-person legislature had only three Black representatives and no Black state senators. (Isbell 2021a). Thus, while Blacks in

the state of Florida had made progress in the years following the Voting Rights Act, the legislature continued to dilute the Black vote so that few Blacks would win elections.

27. In 1975, Congress reauthorized the Voting Rights Act of 1965 for seven years. This included efforts to combat discrimination against "language minority groups (U.S. Department of Justice 2022). Localities also were prohibited from only including ballots in English in communities "where members of a single language minority constituted more than five percent of citizens of voting age." (*Id.*).

28. Five Florida counties (Collier, Hardee, Hendry, Hillsborough, and Monroe) were added to the Voting Rights Act's coverage formula and subject to preclearance (Paulson 2013c) because less than half of adults in those counties were registered to vote and non-English speakers were more than 5 percent of the population, but election materials were provided only in English. Eight counties were also designated as Section 203 covered jurisdictions because a significant number of Spanish-speaking voters are unable to speak or understand English well enough to participate in the electoral process.

29. The political tug-of-war between Florida's Black electorate and its resistant state political actors continued during the 1980s.

30. Collier, Hardee, Hendry, Hillsborough, and Monroe Counties attempted to change their voting procedures many times after being added to the Voting Rights Act's coverage formula.

31. In at least five cases, the U.S. Department of Justice declined preclearance. For example, in 1985, the Department of Justice objected to a restriction on assisting 26 voters casting absentee ballots as a violation of section 208 of the Voting Rights Act (Reynolds 1985). In 1998, the Department of Justice declined to preclear a requirement to include a social security number on submitted absentee ballots because of the requirement's racially discriminatory impact. (Lee). And

in 2012, the United States sued the state to stop a voter purge that the court found likely discriminated against naturalized citizens. See *United States v. Florida*, 870 F. Supp.2d 1346, 1350 (N.D. Fla. 2012)

32. In 1982, the NAACP and other civil rights organizations challenged Florida's redistricting process. The legislature had again redrawn districts to make it difficult for Blacks to elect representatives. Instead of creating a predominantly Black district that combined neighborhoods in South Tallahassee with those in nearby Gadsden County, the state House created two predominantly white legislative districts (the 8th and the 9th) that combined the south sides of Tallahassee and Gadsden, respectively, with predominantly white, rural areas. (Isbell 2021a).

33. Despite this, African American candidate Al Lawson won election to the House representing the 9th district because of a high Black turnout rate and a split of the vote among three white candidates. Lawson and Bette Wimbush, an African American woman, competed in the runoff election that Lawson later won. The 40% Black turnout rate surpassed the 30% turnout among White voters. (Isbell 2021a).

34. Despite the efforts of the legislature to prevent his election, Lawson's victory made him the first Black state representative from the Panhandle since Reconstruction. (*Id.*).

35. During the 1992 redistricting process, both Black and Hispanic citizens demanded the creation of majority Black and Hispanic state legislative and congressional districts. While the NAACP and other civil rights groups requested the creation of two predominantly Black congressional districts, the Florida Black Legislative Caucus requested four such districts. (*Id.*).

36. Illeana Ros-Lehtinen became the first Cuban American congressional representative from

Florida after winning a 1989 special election. (*Id.*). Although this was a significant victory, State Senator Mario Diaz-Balart argued that the Miami-Dade area should have two districts with at least 60% Hispanic populations. (*Id.*).

37. Eventually, after many debates and compromises, the legislature later created three African American districts (two majority and one with a 45% black voting-age population) and two majority Hispanic districts, in South Florida. (*Id.*).

38. After winning election to the U.S. House of Representatives in 1992, Carrie Meek (along with Corinne Brown and Alcee Hastings) became Florida's first Black congressional representatives since Reconstruction. (Isenstadt 2009). Illeana Ros-Lehtinen and Mario Diaz-Balart won the two majority Hispanic congressional districts. (Isbell 2021b).

39. Thus, while the Florida legislature had been attempting to dilute Black and Hispanic votes such that few minorities would be elected, that did not work as well as had been hoped. After the 2000 election, rationale of election reform would be used to pass laws that made it harder for African Americans to vote. Civil rights organizations and private citizens challenged these laws in constant back-and-forth court battles.

THE USAGE OF THE ELECTION REFORM TERM AS A WAY TO COMBAT FRAUD AS AN EXCUSE TO DRAFT LAWS THAT DISCRIMINATE AGAINST BLACK VOTERS

40. In April 2001, the U.S. Commission on Civil Rights issued a report entitled Status Report on Probe of 28 Election Practices in Florida During the 2000 Presidential Election, which found that the following occurred on election day in November 2000:

- Officials did not ensure that all precincts received adequate resources, especially those precincts catering to Black and Hispanic voters.

- "Police sweeps and roadblocks" in African American neighborhoods intimidated many Black voters. Civil rights groups like the NAACP and the Rainbow Coalition requested a federal inquiry after many African American voters alleged voting discrimination in Black and Hispanic neighborhoods. They voluntarily gave sworn statements to the U.S. Justice Department. (Navarro and Sengupta 2000).
- Non-felons were purged from voter registration rolls based on unreliable information and poor purge policies.
- Voter registration applications were not processed in a timely and proper manner under the National Voter Registration Act, commonly referred to as the "motor-voter law."
- Old and defective election equipment was found in poor precincts.
- Language assistance when required and requested was not provided.
- Persons with disabilities faced accessibility problems at polling sites.
- Poll worker training was inadequate.
- Insufficient funds were appropriated for voter education.

(U.S. Commission on Civil Rights 2002a).

41. The U.S. Commission on Civil Rights found that for Miami-Dade County, "African Americans in Florida were more likely to find their names on the purge list than persons of other races. African Americans represented the majority of persons-- over 65 percent-- on both the June 1999 and the January 2000 lists. This percentage far exceeds the African American population of Miami-Dade County, which is only 20.4 percent." (Paulson 2013b).

42. A June 2002 report from the U.S. Commission on Civil Rights, "Voting Irregularities in

Florida During the 2000 Presidential Election," included sworn statements from African American and Hispanic voters that substantiated disfranchisement claims during the November 2000 election period. The Blacks and Hispanics alleged that:

- Their names were not on rolls of eligible registered voters, and Supervisors of Elections offices failed to answer their calls.
- Poll workers confirmed that hundreds, if not thousands, of Black and Hispanic voters were disenfranchised.
- Polling places closed at an earlier time than that posted. According to Lavonna Lewis, an African American first-time voter, her assigned polling place was closed when she arrived to cast a vote. After being informed that it was closed by a white poll worker standing outside, she noticed that the same worker "allowed a white gentleman to walk in and get in line to vote."
- Polling places closed without notice.
- Several Florida voters reported seeing Florida Highway Patrol troopers conducting an unauthorized vehicle checkpoint within a few miles of a polling place in a predominantly African American neighborhood. In another area, trooper vehicles were reportedly parked within sight of at least two polling places. The FHP reported that troopers only visited polling places on Election Day in order to vote. However, in light of the high voter turnout that was expected during the 2000 presidential election, particularly among communities of color that may have a strained relationship with law enforcement, some Floridians questioned the timing of and the motivation for the FHP's actions and believed that they were there to intimate voters which violates the Florida Election Code.

(U.S. Commission on Civil Rights 2002b).

43. After the 2000 election exposed significant problems with Florida's election administration, the legislature passed, and Governor Jeb Bush signed, the Florida Election Reform Act of 2001 (SB 1118) which, according to Governor Bush, was supposed to correct the problems associated with the 2000 election.

44. It prohibited: the use of voting systems that required paper ballots and punch cards; allowed voters to return provisional ballots to the Supervisor of Elections; provided procedures for voting and counting provisional ballots; substantially modified standards and procedures for manual recounts; provided for absentee ballots for overseas voters; allowed voters who had previously requested absentee ballots to cast provisional ballots if they desired to vote in person; and authorized the Elections Canvassing Commission to facilitate absentee voting during emergencies (Florida Senate 2002).

45. SB 1118 eliminated the "for cause" requirement for casting an absentee ballot, thus allowing all registered Florida voters to cast an absentee ballot without restriction.

46. SB 1118 also included a ten-point Voter's Bill of Rights statement that guaranteed the right of every citizen to: 1) vote and have his or her vote counted accurately; 2) cast a vote if in line at poll closing time; 3) seek and receive assistance in voting; 4) receive up to two replacement ballots if needed; 5) receive an explanation if his or her registration is in question; 6) cast a provisional ballot if his or her registration is in question; 7) prove his or her identity by signing an affidavit if there is any doubt; 8) receive written instructions to use when voting, and oral instructions from election officers when requested; 9) vote free from any kind of coercion or intimidation; and 10) vote on a voting system that is not defective and accurately casts votes (Mills 2001, 76 n. 47).

47. SB 1118, however, contained several changes to Florida's election laws that were directed at disenfranchising Black and Hispanic Voters.

48. An African American voter and two organizations challenged the law immediately after it was signed, alleging that it violated the Voting Rights Act as well as the First, Fourteenth, and Fifteenth Amendment of the U.S. Constitution. *Major v. Sawyer*, Case No. 4:01-cv-10088-KMM (SDFL, 2001).

49. In particular, the *Major* lawsuit challenged the following provisions of SB 1118:

- A voter list maintenance section that had standardless ex-felon identification procedure, was more likely to erroneously identify minorities as ex-felons, and also relied on a certified mail procedure that placed the burden on the voter (as opposed to the government) for remaining on the voter rolls.
- The system used to disqualify provisional ballots disproportionally would affect minority voters because it required rejecting as illegal provisional ballots from legal, eligible voters who mistakenly voted in the wrong precinct, and also because the provisions would prevent a provisional ballot from counting if a voter who was erroneously removed from the voter roll did not resolve the eligibility question.
- The requirement that precincts post a list of voter responsibilities were also challenged. These responsibilities include an obligation to 1) study and know candidates and issues; 2) keep his or her voter address current; 3) know his or her precinct and its hours of operation; 4) bring proper identification to the polling station; 5) know how to operate voting equipment properly; 6) treat precinct workers with courtesy; 7) respect the privacy of other voters; 8) report problems or violations of election law; 9) ask questions when confused; and 10) check his or her completed ballot for accuracy (Mills 2001, 76 n. 47).

50. One observer described the voter responsibilities statement as an example of a "modern-

day analogy to unconstitutional literacy tests." (Mills 2001, 76).

51. Another observer expressed the belief that the requirement would "disproportionately discourage minorities from voting." (Ulferts 2005). And the *Major* plaintiffs asserted that "[t]he Voter Responsibilities section of the Election Reform Act has the potential for discrimination in that it is likely to deter electors, particularly racial and language minorities, from voting who have not studied the candidates and issues, are uninformed as to their precinct and its hours of operation, who do not have identification, do not know how to operate voting 36 equipment properly or are otherwise confused regarding some aspect of the election process." (*Major v. Sawyer*, Amended Complaint, ¶ 57).

52. At the time the *Major* lawsuit was filed, certain portions of the challenged provisions were under preclearance review, pursuant to section 5 of the Voting Rights Act, by the Department of Justice. In response, the Florida Secretary of State moved to dismiss several of plaintiffs' claims, asserting that those challenged provisions were not being enforced because they were under preclearance review.

53. Accordingly, the Court granted the motion to dismiss. However, the plaintiffs' challenge to the voter responsibilities portion of SB 1118 was not dismissed and thus the lawsuit proceeded on that claim. However, the Florida legislature, no doubt fearing it would lose the lawsuit, repealed the requirement, which led to the lawsuit's dismissal. *Major*, Suggestion of Mootness.

54. The Florida legislature and governor responded to increased use of early and mail voting by Black and Hispanic voters in the 2008 election by attempting to curtail its use.

55. In 2011, Florida Governor Rick Scott signed House Bill 1355 after the legislature passed it.

56. Among other things, HB 1355 reduced the early voting period to eight days. (The Florida

Senate 2011). HB 1355 also reduced the amount of time for third-party voter registration organizations to submit their voter registration applications from 10 days to "within 48 hours" of receipt, required that they provide the names of the persons collecting applications and that registration forms contain certain identifying information, and ordered the Florida Division of Elections to maintain a database of forms issued to third-party voter registration groups. (The Florida Senate 2011).

57. HB 1355's elimination of voting on the Sunday before election day made it impossible for the members of predominantly African American churches to participate in "Souls to the Polls" events. Caravans of black voters travel to the polls after the end of church services, listened to gospel choirs, and participated in other festivities. (Sherman 2012). Sunday voting was never required in Florida, but some counties offered it before it was eliminated in 2011.

58. Given that it was well-known that Black voters in particular voted in high numbers on the Sunday before election day, the legislature and the governor would have known that eliminating this day of voting would curtail the ability of African Americans to vote.

59. The United States filed a complaint against Florida in 2012, alleging that Florida's voter purge from that year violated the National Voter Registration Act because they purged voters within 90 days of a federal election. (Brennan Center for Justice 2012). Hundreds of eligible voters (disproportionately Hispanic/Latino and other people of color) were purged from voting rolls. (Brennan Center for Justice 2012).

60. In November 2012, a group of Florida citizens filed a class-action lawsuit in federal court after Governor Scott refused to issue an executive order extending the amount of time to vote early (including a reinstatement of Sunday voting). (Reid 2012).

61. After the filing, Hillsborough, Miami-Dade, Orange, Palm Beach, and Pinellas counties

again allowed their residents to vote on Sundays. (Reid 2012).

62. Because the five counties that were still under the preclearance requirement of the Voting Rights Act were not allowed to implement any unauthorized voting restrictions, the Department of Justice successfully sued Florida.

63. As a result, these new restrictions were prohibited from taking effect in the covered counties.

64. In *Florida v. United States* the court stated that "the State has failed to satisfy its burden of proving that those changes will not have a retrogressive effect on minority voters." 885 F. Supp. 2d 299, 303 (D.D.C. 2012).

65. In late April 2013 in a complete reversal of the previous policy, the Florida Legislature passed a bill, HB 7013, that eliminated many of the early voting restrictions contained in HB 1355, such that Florida extended early voting times and the number of polling places.

66. This legislation was passed after Governor Rick Scott commented in January that he had three goals aimed at fixing Florida's voting laws that became an embarrassment for the state during the 2012 National election. "There were inefficiencies in the 2012 General Election …and our system needed to be corrected… I asked the Legislature to enhance our system of elections and they met the challenge," the Governor commented. (Cohen 2014).

67. The issues Scott was referring to boiled down to an increase of early voting days and hours, as well as the institution of more early voting places as well as shorter, easier to complete ballots. (Cohen 2014).

68. HB 7013 reinstated the longer voting day period which was approximately cut in half by

2011's HB 1355. Pursuant to HB 7013, Supervisors of Elections were required to hold a minimum of eight early voting days, but were allowed to hold up to fourteen, including the Sundays that were excluded in 2011.

69. The reinstatement of voting on Sundays resulted in increased Black voter turnout because it allowed many Black churches to resume "souls to the polls" voter turnout efforts.

70. HB 7013 also provided Supervisors of Elections more discretion over where early voting could be held. County-level supervisors used this discretion to add early voting sites at convention, civic, community and senior citizen centers, as well as fairgrounds.

71. Leon County elections supervisor Ion Sancho called HB 7013 "the best piece of elections legislation coming out of the Florida Legislature in the last decade." (Cohen 2014).

72. Despite HB 7013, however, Florida's implementation of its laws continued to disenfranchise Black and Hispanic voters.

73. In *Democratic Executive Committee of Florida v. Detzner*, the plaintiffs challenged Florida's signature match statute, which had been amended in 2017, as unconstitutional.

74. Florida argued that the signature matching provisions in Florida's election law protected the state's interest in preventing fraud. The district court found that the process was illegal and thus issued a preliminary injunction.

75. In particular, the court held that Florida's then in place signature matching statute was "based on a standardless determination made by laypeople that the signature on a voters' vote-by-mail or provisional ballot does not match the signature on file with the supervisor of elections."

76. The court went on, "Signature matching is a questionable practice, but it is hard to think of another way for canvassing boards to confirm vote-by-mail voters' identities. What makes Florida's signature matching process even more problematic is that fact that counties have

discretion to apply their own standards and procedures. Certain counties, such as Leon County, go above and beyond to ensure voters have a chance to cure a signature mismatch. But nothing in the law requires that and other counties may choose not to exercise the level of care and concern Leon County does. The only way such a scheme can be reasonable is if there are mechanisms in place to protect against arbitrary and unreasonable decisions by canvassing boards to reject ballots based on signature mismatches." (*Detzner* 2018).

77. The court held that the statutory cure period was insufficient: "The cure period was intended to solve the inherent problems in signature matching, but the opportunity to cure has proven illusory. Vote-by-mail voters, in this election, were not notified of a signature mismatch problem until it was too late to cure. Provisional ballot voters are provided no opportunity to cure under the law. Without this Court's intervention, these potential voters have no remedy. Rather, they are simply out of luck and deprived of the right to vote. What is shocking about Florida law is that even though a voter cannot challenge a vote rejected as illegal, any voter or candidate could challenge a vote accepted as legal. The burden on the right to vote, in this case, outweighs the state's reasons for the practice." (*Detzner* 2018).

78. The court also found that unchecked discretion held by election officials to reject vote-by mail ballots from eligible voters deemed "noncompliant" was not allowed, holding that this absolute power to throw out votes was facially unconstitutional because it unduly burdened the fundamental right of Florida citizens to vote and have their votes counted. *See Democratic Exec. Comm. of Fla. v. Detzner*, 347 F. Supp. 3d 1017, 1022 (N.D. Fla. 2018) ("The precise issue in this case is whether Florida's law that allows county election officials to reject vote-by mail and provisional ballots for mismatched signatures—with no standards, an illusory process to cure, and

no process to challenge the rejection—passes constitutional muster. The answer is simple. It does not.").

79. The defendants, including Florida's Secretary of State, appealed and sought to stay the district court's order. The 11th Circuit Court of Appeals denied the motion to stay the preliminary injunction. The appeal was eventually dismissed for being "moot" because Florida promulgated a new statute that replaced the one found unconstitutional by the district court. (*Democratic Exec. Comm. of Fla. v. Nat'l Republican Senatorial Comm.* 2020).

80. This litigation took place in the context of significant racial disparities in signature matching rejections, as Black and Hispanic voters had considerably higher ballot rejections than did white voters, as the following data from the 2018 election in Florida demonstrates.

81. Another example of Florida's backlash against progress made by Black and Hispanic Floridians' voting rights was the response of the Florida legislature and governor to passage of Amendment 4 to the state constitution.

82. In Amendment 4, Florida's citizens voted overwhelmingly to end felony disenfranchisement—a relic of the Reconstruction Era that disproportionately impacts Black and Latino voters.

83. Almost immediately upon passage, the Florida legislature took steps to limit the amendment's impact and preserve, as much as possible, the racially discriminatory practice.

84. Prior to 2019, Florida's constitution permanently disenfranchised all citizens who had been convicted of any felony offense unless the Clemency Board restored their voting rights—making Florida one of only four states to impose a lifetime voting ban for a felony conviction.

85. Disenfranchisement based on criminal conviction, which has been called the "new Jim

Crow," is "inextricably tied to the United States' history of racial discrimination," and Florida adopted this constitutional provision "in the post-Civil War era as a means to disenfranchise former slaves who had been granted the right to vote under the Reconstruction Amendments." (Figueredo 2020). By 2016, the provision disenfranchised an estimated 1.6 million Floridians.

86. In 2018, Florida voters addressed this longstanding discrimination by approving Amendment 4, which automatically restored voting rights to as many as 1.4 million Floridians who had completed the terms of their sentences.

87. The Florida legislature responded with SB 7066, prohibiting returning citizens from voting unless they pay off all legal financial obligations imposed by a court pursuant to a felony conviction, even if they cannot afford to pay.

88. According to a 2020 report issued by The Sentencing Project, nearly 900,000 Floridians who would otherwise have been eligible to vote under Amendment 4 were disenfranchised by the law. In all, more than 1.1 million Floridians are unable to vote because they have felony convictions or owe court debts, making Florida the nation's felony disenfranchisement leader.

89. Reportedly, about 15 percent of the state's Black voting-age population is disenfranchised because of a conviction history, compared to about 6 percent for the state's non-Black population. (Uggen 2020).

90. In addition, Florida has and continues to underfund its election infrastructure, and this has led to additional voting challenges for Black and Hispanic voters. For example, during the November 2012 election, many Floridians were still in line waiting to vote when polls closed.

91. A study by Ohio State University professor Theodore Allen discovered that 201,000 Floridians did not vote due to the long lines. (Paulson 2013ba).

92. The Presidential Commission on Election Administration, a bipartisan ten-member

commission established by an Executive Order issued by President Obama, recommended reforms after listening to hours of testimony from election officials, voting-rights advocates, professors, and citizens about, e.g., Florida's long waits to vote. (Presidential Commission on Election Administration 2014).

93. Its members concluded that Florida's voters waited in line for much longer periods than voters in other states. (Presidential Commission on Election Administration 2014).

94. Black and Hispanic voters waited for longer periods than white voters. On average, Florida voters waited for 39 minutes to cast a ballot on election day in 2012 (compared to a 13-minute wait time nationally). (Bennett 2013). While white Floridians waited for an average of 11.6 minutes to vote, Black voters waited twice as long (23.3 minutes) and Latinos waited seven minutes longer (an average of 18.7 minutes). (Bennett 2013).

95. In 2015, the Florida Supreme Court ordered that several congressional districts from the 2012 redistricting process be redrawn because they violated Florida's constitutional ban on partisan gerrymandering. (Madigan 2015).

96. While this decision did not rest on a claim of racial discrimination, later evidence revealed that a prominent political consultant who was involved with racial gerrymandering met with Florida officials, even though he claimed, under oath, that he did not: Thomas Hofeller submitted an affidavit in the case denying that he had been in contact with any Florida lawmakers regarding their redistricting effort. (Daley 2019).

97. But emails found on his hard drive show that he flew to the state's capital to meet with Republican strategists during the redistricting effort. (Daley 2019)

98. Hofeller's files included extensive data on Florida, including a spreadsheet marked "Florida

Minority Senate Data." The evidence suggests that even though the redistricting plan was struck down due to partisan gerrymandering, racial gerrymandering may have motivated the redistricting process as well (Daley 2019)).

99. Before signing SB 90, Florida Governor Ron DeSantis referred to it as an election reform law designed to prevent election fraud and preserve election integrity.

100. As he signed it, the governor explained the rationale behind it when he said, "Your vote is going to be passed with integrity and transparency. . . . Right now I have what we think is the strongest election integrity measures in the country. . . . We're also banning ballot harvesting. We're not going to let political operatives go and get satchels of votes and dump them in some drop box." (Mower 2021).

101. However, he acknowledged that no serious voting irregularities occurred during the November 2020 election. (Calvan 2021).

102. Key provisions of the bill include the following requirements:

- Floridians now have to provide a driver's license number, state ID number or the last four digits of their Social Security number to request a vote by mail ballot.
- Instead of requesting a mail ballot through the next two general elections (for the next four years), requests are limited to the next general election (for two years).
- Drop boxes can only be used during early voting hours, unless it is located at the Supervisor's office, and the boxes must be physically supervised while in use. Relying on remote video surveillance is not allowed. Failure to provide adequate supervision carries a $25,000 fine for leaving drop boxes unattended during early voting hours.
- Nonprofit organizations seeking to register voters must now include a mandatory disclaimer "warning" voters that their registrations may not arrive on time, and are

required -- under penalty of severe fines -- to deliver completed registrations to the voter's individual county within 14 days.

- The bill expands the definition of "solicitation" to include "engaging in any activity with the intent to influence or effect of influencing a voter" and it extends the "no-solicitation zone" to the 150 feet around ballot drop boxes.

(Mower 2021).

103. On March 31, 2022, U.S. District Court Judge Mark E. Walker of the Northern District of Florida in Tallahassee found that the drop box provision, the prohibition against "engaging in any activity with the intent to influence or effect of influencing a voter," and the registration disclaimer provision were unconstitutional. *League of Women Voters of Fla., Inc. v. Lee*, No. 4:21CV186-MW/MAF, 2022 WL 969538 (N.D. Fla. Mar. 31, 2022).

104. In addition, it was found that the legislature had engaged in a pattern of racially discriminatory election laws over the last 20 years. (*League of Women Voters of Florida, Inc. v. Lee 2022*).

A DISCRIMINATORY CONGRESSIONAL MAP PLAN

105. On April 22, 2022, Governor DeSantis signed into law a congressional voting plan ("the DeSantis Plan") that dismantled a majority-minority congressional district in North Florida (including parts of Jacksonville) created in 2015. Congressional District 5 ("Benchmark CD-5" or "CD-5") had given Black Floridians across North Florida the ability to elect their preferred candidates to the U.S. Congress. As a result of the elimination of Benchmark CD-5, more than 370,000 Black Floridians who had the ability to elect their preferred candidates have now been moved to predominately white districts and stripped of their ability to determine who represents them in Congress.

106. On May 11, 2022, Leon County Circuit Judge Layne Smith blocked this plan. (Hazen 2022). However, the Florida Supreme Court refused to hear a challenge to the DeSantis Plan before the midterm elections. (Downey 2022). Thus, the DeSantis map remains in force, transforming CD-5 (with a large Black voting-age population) into the second congressional district (CD-2) (with a majority White district).

107. CD-5's incumbent, U.S. Rep. Al Lawson, an African American native of Midwayin Gadsden County, was elected in 2016 and re-elected twice with little opposition. However, he was defeated on November 8th by Republican Neal Dunn, a White surgeon from Panama City, leaving many Black Jacksonville residents no longer represented by a candidate of their choice. (Downey 2022).

108. Before his defeat, Lawson represented parts of North Florida since first serving in the Legislature from 1982 to 2010 and later in the U.S. House in 2017. Both men were incumbents in different districts before redistricting. After these districts were combined, only one could be re-elected in 2022. Dunn received 60% of the vote to Lawson's 40%. (The race for CD 2 was the embodiment of the legal controversy surrounding Florida's new congressional maps.). (Downey 2022).

109. Speaking in October 2022 in Gadsden County, Florida's only majority-African American county, Lawson told members of the Havana community that DeSantis "has a problem with people of color. . . . He wanted to change it because he didn't want an African American to represent this area where slave owners, sharecroppers lived, from Jackson County all the way down to Duval County. They stayed in those areas and were not represented until I got there." (Downey 2022)

SF2: the extent to which voting in the elections of the state or political subdivision is racially polarized.

110. This SF is addressed by Dr. Kosuke Imai, but I note that his findings are supported by my own research. In 2021, my research, "Contemporary Black Populism and the Development of Multiracial Electoral Coalitions: The 2018 Stacey Abrams and Andrew Gillum Gubernatorial Campaigns," examined racially polarized voting in Florida and Georgia gubernatorial elections from 1998-2018.

111. I found that between 81% and 94% of Black Floridians voted for the same candidate in each gubernatorial election held during this twenty-year period.

SF3: the extent to which the state or political subdivision has used unusually large election districts, majority vote requirements, anti-single shot provisions, or other voting practices or procedures that may enhance the opportunity for discrimination against the minority group.

112. Florida has a history of runoff elections inhibiting the ability of minority voters to elect minority representatives. Florida was the first state to adopt the runoff primary in 1901. At that time, blacks made up 44 percent of the population and there was a fear that a Black candidate might win an election in a multi-candidate field. (Paulson 2013b). To diminish that possibility, a second or runoff primary was instituted. If no candidate received a majority of the vote in the first primary, the top two vote-getters would compete in a runoff. (Wright 2000).

113. Even when Black candidates received the most votes in the general election, they often lost runoff elections when competing against a white candidate because Black and white voters voted largely on the basis of race. (*Meek v. Metropolitan Dade County* 1992). White candidates benefitted from the larger white population or turnout in these cities when only two candidates (one White, one Black) were on the ballot. (Wright 2000). Recent studies find that

Black candidates choose not to run for southern political offices if runoff elections are required because they do not believe they can win. (Keele et al. 2017).

114. At-large elections have also enhanced the opportunity for discrimination against minority voters. These elections require that minority candidates win citywide, rather than particular districts. This requires additional funding and name-recognition and that candidates win substantial support from white voters in cities with histories of racially polarized voting. In predominantly white cities with histories of racially polarized voting, white candidates are much more likely to win. (Paulson 2013b).

115. The State of Florida was found to have mandated at-large elections for school boards for a racially discriminatory purpose: Looking at the change from single-member districts to at-large districts through *Arlington Heights* glasses, the conclusion that the change had an invidious purpose is inescapable.

116. The specific sequence of events leading up to the decision mandates the conclusion that the citizens of Escambia County in 1945, with the demise of the white primary, were not going to take any chances on Blacks gaining power and thus purposefully sought to dilute black voting strength through the use of an at-large system. There have been many cases in which school board, judicial circuit, and other at-large election schemes in Florida have been invalidated.

117. Eventually, a 1992 class-action lawsuit filed by a group of African American, Black ethnic, and Hispanic plaintiffs culminated in changes in Miami-Dade County. Before the 1992 ruling in *Meek v. Metropolitan Dade County*, only one African American and one Latino had ever served on the Dade County Commission at any one time. (Grenier and Castro 1999, 287).

118. Both groups were disadvantaged by at-large elections, but especially African Americans. By the early 1990s, Hispanics and African Americans together constituted about 70

percent of the population. (Warren and Moreno 2003, 289). Few minority candidates amassed the funding to win countywide elections nor did they have the crossover appeal that was sufficient for them to gain enough white and Hispanic votes to secure victories. (Warren and Moreno 2003, 290).

119. In 1986, African American attorney and Miami commissioner Arthur Teele Jr., filed the *Meek* federal class action lawsuit on behalf of minority voters in the Miami-Dade area. These plaintiffs argued that the at-large election system violated the Voting Rights Act because it diluted the votes of ethnic and racial minorities. (Croucher 2002, 236). The lawsuit referred to the difficulty minority voters had when attempting to elect county commissioners. The major impediments included the small Black populations, residential patterns, the financial burdens minority candidates assumed when seeking countywide offices, and the racially polarized voting behavior of minorities and Anglos. (Croucher 2002, 236).

120. The *Meek* case points out an example of contemporary discrimination that is harder to detect. Although whites were the minority, their voting bloc determined the outcome of elections. At times, minority candidates competed in runoff elections, but lost them because of their inabilities to attract crossover votes. For example, only five African Americans and two Hispanics served on the Miami-Dade county commission from 1957 to 1992 although several had run for office. (Warren and Moreno 2003, 289).

121. On August 14, 1992, federal court judge Donald Graham ruled in favor of the plaintiffs, ordering that Dade County's at large electoral structure be changed to one where commissioners would be elected from thirteen single member districts. The court agreed that Miami-Dade County's at-large election system discriminated against African Americans and Hispanics by making it more difficult for them to elect their preferred representatives. (*Meek v.*

Metropolitan Dade County 1992). Eventually, a thirteen-member district commission (with three predominantly Black, seven predominantly Hispanic, and three predominantly white districts) replaced the nine member at-large commission. (Austin 2018, 110).

122. As a result of the *Meek* case, the commission became much more diverse. One study reported, "In April 2003, the county commission went from a nine-member body with never more than one African American and one Hispanic commissioner at a time to a thirteen member body with six Hispanics, four African Americans, and three non-Hispanic whites." (Warren and Moreno 2003, 289).

123. Changes to rules governing absentee voting also have had negative effects on minority voter turnout in Florida.

124. For example, in 1998, in response to documented voter fraud in the City of Miami, the Florida Legislature passed a Voter Fraud Act.

125. The Department of Justice objected to several of these changes it required because of violations of Section 5 of the Voting Rights Act, finding, "Although the proposed changes to the absentee voter certificate and ballot are likely to make it more difficult for all voters to cast absentee ballots, because the harm appears to fall more heavily on minority voters and thus puts them in a worse position, the state has not met its burden of showing that the proposed changes will not "lead to a retrogression in the position of... minorities with respect to their effective exercise of the electoral franchise." *Beer v. United States*, 425 U.S. 130, 141 (1976).

126. The Department found that minority voters used absentee voting at high rates but were more likely to fail to meet the state's new requirements for absentee voting due to differences in literacy and socioeconomic status, language ability, and access to witness signatures.

127. As a result of the Florida Election Reform Act of 2001 (SB 1118), Florida's governors and state legislatures began encouraging voters to cast absentee, mail, or drop box ballots.

128. Beginning in 2002, the governor and state legislature encouraged the state's voters to cast "no excuse" absentee ballots and submit them either by mail or drop box. (Sherman 2012).

129. At the time, voters did not have to provide reasons for their ballot requests and in 2016, state legislators changed the names of these ballots from absentee to "vote-by-mail" ballots." (Turner 2020).

130. Florida statute 101.62 (Fla. Stat. § 101.62) stipulated the manner in which absentee ballots could be requested and delivered. (The Florida Senate 2002).

131. In 2002, one would have predicted that white voters would be more likely to mail in absentee ballots because of our nation's history. Throughout most of American history, white members of the military, American citizens living abroad, and the physically disabled voted by absentee ballot much more frequently than did other Americans. (Rotondi 2020).

132. Indeed, the first documented usage of absentee ballot voting occurred in 1864 during the Civil War when approximately 150,000 of one million white males voted in the 1864 presidential election. (Rotondi 2020). Additional federal voting legislation was passed in 1942, 1955, 1986, and 2009 to make it easier for military men and women (most of whom were white) to vote by absentee ballot. (Rotondi 2020). For many years, the governor and legislature also encouraged no excuse absentee voting because it benefits "Republican-leaning voters" who usually are white. (Jeffe and Jeffe 1990; Karp and Banducci 2001; Oliver 1996).

133. As white Floridians continued to vote by mail in larger numbers, Florida continued to make it easier to do so. In 2004, Florida promulgated SB 2566, which took effect on July 1, 2004.

134. SB 2566 amended earlier legislation by eliminating the previous requirement that signatures on absentee ballots had to be witnessed. Instead, SB 2566 gave the Supervisor of Elections in each county 38 authority to compare voter signatures to verify registration. SB 2566 also allowed voters to submit their ballots up to 15 days before election day at an early voting site and until two days before a scheduled election. (Herron and Smith 2012).

135. All of these actions on the part of the governor and legislature were designed to increase the number of citizens voting by absentee ballot, mail ballot, or early voting, and to avoid issues such as long lines and defective machines on election day. (Posner 2001). After the enactment of SB 2566, increasing numbers of Black and Hispanic citizens began voting during early voting periods (both in-person and by absentee ballot) rather than on election day.

136. In 2009, the Department of Justice filed a complaint against the Town of Lake Park in Palm Beach County, FL, alleging that the town's at-large system of electing its Commissioners denied Black voters of an equal opportunity to elect representatives of their choice and violated Section 2 of the Voting Rights Act.

137. The town ultimately agreed to a consent decree, discontinuing its use of at-large elections to choose Commissioners.

138. The 2011 HB 1355 law required county canvassing boards to report all early voting and tabulated absentee ballots to the Department of State within 30 minutes after the polls close, and to subsequently report all results (other than provisional ballots) every 45 minutes until complete. (The Florida Senate 2011).

139. A stated rationale for HB 1355 was preventing voter fraud. For example, in an October 11, 2011 press release, the then Florida Secretary of State stated that HB 1355 was needed "to combat voter fraud by preventing voters from casting a vote in multiple counties." (Simon, p. 5).

140. Indeed, according to an article in the *Palm Beach Post*, "Republican leaders said in proposing the law that it was meant to save money and fight voter fraud**."** (Kam 2012). However, the article quotes former Florida Republican Party Chairman Jim Greer as stating: "They never came in to see me and tell me we had a (voter) fraud issue. . . . It's all a marketing ploy." (Kam 2012).

141. The article further reported that "[Governor] Crist said in a telephone interview this month that he did not recall conversations about early voting specifically targeting black voters 'but it looked to me like that was what was being suggested. And I didn't want them to go there at all.'" (Kam 2012).

142. One private citizen referred to HB 1355 as "nothing but a direct attack on black voters. In Florida in 2011, when there were all of these laws passed to restrict early voting days to get rid of Souls to the Polls Sundays, to make it harder to register voters, that was an explicit strategy to suppress the black vote." (Lerner 2016). As a result of this law, early voting sites would be closed on the Sunday before election day. (Sherman 2012).

143. In response to HB 1355, then-U.S. Attorney General Eric Holder wrote a letter to then-Governor Scott that said, "I am deeply disturbed that during your tenure, your state has repeatedly added barriers to voting and restricted access to the polls." (Sherman 2014).

144. According to Holder, the law would have resulted in a "dramatic reduction in a form of voting disproportionately used by African Americans" and further that "[a]ccordingly, the

court [discussed below] refused to approve reduced early voting hours with respect to the five counties in Florida covered by the preclearance provision in the Voting Rights Act." (Sherman 2014).

145. In 2012, U.S. District Judge Robert Hinkle struck down some of HB 1355's provisions, including one that levied fines against voter-registration groups if they fail to submit registrations forms within 48 hours, as opposed to the 10 days they had to submit forms before HB 1355. (Hastings 2012). According to Judge Hinkle, the 48-hour requirement placed an undue burden on these groups. He also stressed the importance of "permitting responsible organizations to conduct voter registration drives and making it easier for citizens to register and vote promotes democracy." (Hastings 2012).

146. Denise Velázquez, executive director of State Voices of Florida, was one of many Floridians who believed that HB 1355 was designed to prevent Black and Hispanic Floridians from voting and expressed her disapproval of the law when she said, "They [the legislature and then-Governor Rick Scott] did it on purpose. There was no mistake about it. When we minority voters came out in 2008 in unprecedented numbers, they started looking for a way to keep that from happening again." (Hastings 2012).

147. José Balasquide, Florida state director for 43 plaintiff Mi Familia Vota Education Fund (a voter education, registration and mobilization group that registered thousands of Latino voters during the 2008 and 2010 elections) agreed that the new law had the ulterior motive of suppressing the Hispanic vote in particular and said: "They haven't been able to demonstrate premeditated fraud. If they don't have proof, it seems to me that this is a strategy to depress the community's interest in participating in the electoral process, and organizations like ours from persuading and promoting electoral participation in the Latino community." (Hastings 2012).

SF4: if there is a candidate slating process, whether the members of the minority group have been denied access to that process.

148. Not addressed.

SF5: the extent to which members of the minority group in the state or political subdivision bear the effects of discrimination in such areas as education, employment and health, which hinder their ability to participate effectively in the political process.

149. In July 2021, Florida had a poverty rate of 13.1 percent (U.S. Bureau of the Census, 2022. In table 1 below, I include the poverty rates, median household incomes, educational levels of Black, White, and Hispanic citizens in the below counties with the highest diversity indexes. I also include this information for counties with Hispanic/Latino populations that are above 50 percent according to 2021 census information – Miami-Dade, Hendry, and Osceola – and counties with the largest Black populations – Gadsden, Madison, and Hamilton (Powers 2021).

150. With the exception of Duval, higher percentages of White citizens lived in poverty in these counties than Black and Hispanic citizens. As shown in the table, 41.7% of Black citizens live in poverty in Duval County compared to 38.8% of Whites and 10.3% of Hispanic/Latino residents.

151. In Broward, Orange, Hillsborough, Duval, and Palm Beach, poverty rates were significantly higher than the state poverty rate. In some cases, Blacks, Whites, and/or Hispanics were two to three times more likely to live under the poverty level.

152. In Miami-Dade, Hendry, and Osceola, larger percentages of whites lived under the poverty level, followed by Hispanic citizens, and Black citizens. In Gadsden, Madison, and Hamilton counties, larger percentages of Blacks and Whites lived in poverty than Hispanic citizens.

Table 1

2021 Poverty Status of Florida's Minority and White Residents

Florida County	Black Poverty	Hispanic Poverty	White Poverty
Broward	30.5	22.9	38.0
Orange	20.2	28.8	39.0
Hillsborough	18.5	28.3	43.0
Duval	41.7	10.3	38.8
Palm Beach	22.2	24.5	46.4
Miami Dade	14.9	40.4	40.6
Hendry	7.7	39.7	47.0
Osceola	7.3	39.8	42.2
Gadsden	60.8	14.3	19.4
Madison	47.4	8.2	40.4
Hamilton	30.2	11.5	49.4

Source: Data USA. 2022. https://datausa.io/.

153. In Jacksonville, Florida (Duval County) the average Black median household income ($39,214) trails that of Jacksonville citizens ($58,709) significantly. (Black Demographics 2022).

154. The Black homeownership rate (42.8%) is over twenty percent lower than the White homeownership rate (63.6%). (Black Demographics 2022).

155. The poverty rate for Black families (20.9%) is double that of other Jacksonville families (10.1%). (Black Demographics 2022).

156. Because Black and Latinx families move more often, rent more often, and are poorer than white Floridians, they likely have much less home access to the internet.

157. Not having an internet connection, in turn, makes it more difficult to register to vote online and to learn about all of the many changes in the voting process.

158. The fact that Florida, unlike other states, does not require employers to allow employees time off to vote, also potentially diminishes minority participation at a time when flexible time for new ways of voting and even longer voting lines than previously are likely.

159. The fact that minorities move more often may make it more difficult for minorities than for non-Hispanic whites to vote by mail, because election authorities may not have up-to-date addresses for them.

160. On account of their comparative poverty and, more important, on account of the Florida State Government's refusal to expand Medicaid under the Affordable Care Act, minorities in the state were much more likely than non-Hispanic whites to be uninsured in 2018.

161. Since nationally, minorities have been more likely to lose their jobs, and thus, their health insurance because of the pandemic, the health insurance gap between non-Hispanic whites and minorities in Florida has probably increased during 2020.

162. Florida Department of Health (FDOH) statistics from 2019 show that minorities in the state were more likely than non-Hispanic whites to have several conditions (obesity, hypertension, and early-onset diabetes) that the Centers for Disease Control has found are associated with susceptibility to COVID-19.

163. FDOH figures also emphasize that minorities in the state were about 60% as likely to have previously had vaccinations for flu and pneumonia, possibly disproportionately weakening their lungs, that minorities were 83-94% less likely to have health insurance (reaffirming figures from the U.S. Census), and that they were about 150% more likely not to have seen a doctor in the last year because of the cost of doing so.

164. Although reporting on COVID-19 case numbers and hospitalizations by race in Florida is spotty and outdated, and in some reports, deliberately inaccurate, the fragmentary data that we do have, shows that as of May, 2020, Black deaths from COVID-19 are nearly 50% larger than the proportion that we would expect from their proportion of the population.

165. A greater incidence of morbidity within the African American and Latinx communities on account of COVID-19 would likely increase their demand for mail ballots, and therefore, for eased online voter registration, less restrictive vote-by-mail acquisition and submission policies, more early voting, polling place, and curbside drop-off facilities, and more opportunities to cure errors in acquiring and casting ballots.

166. Because they are likely to be sicker from COVID-19, these communities can enjoy an opportunity "to participate in the political process and to elect representatives of their choice" only if those procedures are eased or made more widely available compared to what they are now.

SF6: whether political campaigns have been characterized by overt or subtle racial appeals

167. Race has been an issue in Florida political campaigns in both the past and present.

168. In the past, candidates openly discussed the need to disenfranchise voters of color.

169. In today's political climate, candidates use more coded racial appeals than the candidates of the past. In 1981, late political strategist Lee Atwater discussed the manner in which candidates could use racial appeals using code words without sounding racist when he said:

You start out in 1954 by saying, "N-----r, n-----r, n-----r." By 1968 you can't say "n-----r"—that hurts you, backfires. So you say stuff like, uh, forced busing, states' rights, and all that stuff, and you're getting so abstract. Now, you're talking about cutting taxes, and all these things you're talking about are totally economic things and a byproduct of them is, blacks get hurt worse than whites.… "We want to cut this," is much more abstract than even the busing thing, uh, and a hell of a lot more abstract than "N-----r, n-----r." (Perlstein 2012).

170. Blatant racial appeals in election campaigns in Florida were replaced by more subtle, but still effective ones by the 1990s, and they were still evident in the campaign against the first black nominee of a major political party in Florida history in 2018.

171. In 1994, Doug Jamerson became the first minority campaign for a statewide, non-judicial office since the Voting Rights Act's enactment. He led a major school reform effort in the Legislature and had been appointed to the post of Education Commissioner in 1993 by Gov. Lawton Chiles. (O'Neal 1993).

172. In the general election, Jamerson, who had been the principal legislative architect of the "Blueprint 2000" school reform movement to give school boards and parents more power to control their schools, competed against Republican Frank Brogan, superintendent of small (and wealthy) Martin County. (Klas 2016)

173. According to the *Miami Herald*, Brogan "would like to see the Department of Education practically abolished." (Klas 2016).

174. Toward the end of the campaign, Brogan ran a 30-second ad that devoted a third of the time to showing his opponent, dressed in a tuxedo against a dark background, "looking sweaty and overweight," according to Jamerson supporters, who condemned the ad as "a blatant appeal to race." (Klas 2016).

175. In November, 1994, despite the fact that Democrat Lawton Chiles beat Republican Jeb Bush for governor, Jamerson became the first Democrat ever to lose a race for Education Commissioner. (Rado 2005).

176. When State Sen. Daryl Jones followed in Jamerson's footsteps by contesting the Democratic nomination for governor in 2002, the Tallahassee Democrat noted that he was “the first black politician to make a serious run for governor of a state with a history of rejecting minority candidates.”

177. Jones finished a distant third in the primary with 12% of the vote.

178. He was no more successful when he was chosen as the nominee for Lt. Gov. on the Democratic ticket by Congressman Jim Davis. Both lost.

179. The explicit racial appeals of 1994 echoed in 2018 with the nomination of Andrew Gillum, the first black candidate for governor in the state's history.

180. In 2018, allegations of racism surfaced during the year’s gubernatorial election when eventual winner Governor Ron DeSantis said the following in reference to Gillum:

Florida elections are always competitive, and this is a guy who although he’s much too liberal for Florida, I think he's got huge problems with how he's governed Tallahassee, he is an articulate spokesman for these far left views, and he's a charismatic candidate. . . . I watched those Democrat debates and none of that is my cup of tea but he performed better than the other people there so we've got to work hard so that we continue Florida going in a good direction. Let's build off the success we've had with Governor Scott. . . . The last thing we need to do is to monkey this up by trying to embrace a socialist agenda with huge tax increases and bankrupting the state. That is not going to work. That's not gonna be good for Florida. (Griffin 2018).

181. When discussing allegation of racism, Gillum gave one of the evening's most memorable quotes during an October 2018 debate with DeSantis. "First of all, he's got neo-Nazis helping him out in the state. He has spoken at racist conferences. He's accepted a contribution and would not return it from someone who referred to the former president of the United States as a Muslim n----r. When asked to return that money, he said no. He's using that money to now fund negative ads. Now, I'm not calling Mr. Desantis a racist. I'm simply saying the racists believe he's a racist." " (Lopez 2018).

182. Gillum was referring to racist robo-calls that surfaced during the campaign season that can be found here: https://www.youtube.com/watch?v=s_CqO_eXzBE. In one of them, Florida voters heard the following, "Well hello there. I is the negro Andrew Gillum and I'll be askin' you to make me governor of this here state of Florida. My state opponent, who done call me monkey, is doin' a lot of hollerin' about how 'spensive my plans for health care be." (Wise 2018).

183. There were other public comments with racial overtones directly connected with the DeSantis campaign. Republican Congressman Matt Gaetz, speaking at a DeSantis rally, invoked a familiar racist trope connecting African Americans with crime when he falsely charged that Tallahassee, during the time when Gillum was mayor, had become "the murder capital of Florida. I don't know whether to call him Andrew Gillum or Andrew Kill'em." (Ogles 2018).

184. Race was the most dominant issue in the 2018 gubernatorial campaign. During the October 2018 debate, Gillum pointed out the governor's decision to speak at a rally hosted by David Horowitz who according to the Southern Poverty Law Center "has since the late 1980s [been] a driving force of the anti-Muslim, anti-immigrant, and anti-black movements." (Southern Poverty Law Center 2022). When again asked about his decision, DeSantis replied, "How the hell

am I supposed to know every single statement someone makes? I am not going to bow down to the altar of media correctness." To which, Gillum replied, "My grandmother used to say, 'A hit dog will holler,' and it hollered through this room." (Krieg 2018).

185. The 2018 gubernatorial race was not the only one from that year that contained racial appeals.

186. In January 2018, Florida House Speaker Richard Corcoran used a campaign ad in opposition to "illegal immigration" and sanctuary cities that many compared to the 1915 film Birth of a Nation that condoned and glorified the Ku Klux Klan and racist stereotypes about Black men. The ad can be found here: https://www.youtube.com/watch?v=MVhnhwvCFvE.

187. In it a young white woman walks past a man wearing a hoodie and is gunned down in broad daylight. It is loosely based on the experience of 32 year-old Kate Steinle who was murdered by an undocumented man in San Francisco while walking with her father and a friend (Steiglitz 2022). Many refer to her murder when stating their opposition to sanctuary cities. The ad ends with Corcoran saying, "On my watch, Florida will never be a sanctuary state."

188. In 2019 when discussing abortion, Republican state senator Dennis Baxley said during a radio interview (https://www.wlrn.org/show/the-florida-roundup/2019-05-19/we-now-have-a-lot-to-look-at-florida-republican-says-hes-encouraged-by-alabama-abortion-law), "When you get a birth rate less than two percent, that society is disappearing. And it's being replaced by folks that come behind them and immigrate, don't wish to assimilate into that society and they do believe in having children. So you see that there are long-range impacts to your society when the answer is to exterminate." (WLRN 2019).

189. When Val Demings ran against U.S. Senator Marco Rubio (R.-FL), coded language such as the usage of the word "socialist" was used.

190. Rubio accused Demings of supporting a “crazy” and “socialist” liberal budget proposal. When she complained, he responded, “I don’t know what word you would prefer. Socialist, Marxist. Crazy. I don’t know. I’m open to suggestions.” (Swisher 2022).

191. In a television ad entitled “$5 Trillion Socialist Spending Spree,” (https://www.youtube.com/watch?v=v0zuqqrSoiE), Senator Rubio accused her of voting “with the socialist squad 94 percent of the time.”. The ad pictures photos of Puerto Rican American Representative Alexandria Ocasio-Cortez (D.-NY), Somalian American Representative Ilhan Omar (D.-MN), Muslim American Rashida Tlaib (D.-MI), and African American Representative Ayanna Pressley (D.-MA).

SF7: the extent to which members of the minority group have been elected to public office in the jurisdiction.

192. Florida has a long history of failing to elect minorities to office.

193. No African American served in the State Legislature or Congress from Florida from 1889 until 1969.

194. Even today, the percentage of Black state legislators is well below the proportion of minorities in Florida's population.

195. Despite the barriers Black candidates have encountered, some have won local offices.

196. Major urban cities such as Jacksonville (Alvin Brown), Sarasota (Shelli Freeland-Eddie), and St. Petersburg (Ken Welch) have elected Black mayors.

197. Black mayors have also represented counties such as Broward (Barbara Sharief) and Orange (Jerry Demings).

198. Some municipalities such as El Portal, Lauderdale Lakes, and North Miami have also been governed by majority or all-Black governing coalitions (Austin 2018).

199. Yet, it has been very difficult for African Americans to win statewide positions.

200. Only two blacks have won statewide office, Democratic Supreme Court Justice Joseph Hatchett, who had been appointed to the office, in 1975, and Republican Jennifer Carroll, elected Lt. Gov. in 2010 and forced to resign because of a scandal in 2013.

201. Although she boasted of having increased the Republican share of the Black vote to six percent, she was largely ignored by Scott once he took office, according to newspaper accounts.

202. State Sen. Daryl Jones lost a contest for governor in 2002 and for Lieutenant Governor in 2006, and Mayor Andrew Gillum failed to win the governorship by a mere 0.4% in 2018. (Austin 2021).

203. In Jacksonville, two of the five at-large Council members are Black/African American and the Council representatives of Districts 7, 8, 9, and 10 (the packed districts) as well as Council member Joyce Morgan of District 1 are African American.

Whether there is a significant lack of responsiveness on the part of elected officials to the particularized needs of the members of the minority group.

204. Every governor until 1970, even the moderate Leroy Collins, felt the necessity to endorse segregated schools. (Black 1976, 90-98).

205. As the federal court for the Northern District of Florida noted in 1992, a longstanding general history of official discrimination against minorities has influenced Florida's electoral process.... As recently as 1967, § 350.20, Fla. Stat. provided in part: "The Florida Public Service Commissioners may prescribe reasonable rules and regulations relating to the separation

of white and colored passengers in passenger cars being operated in this state by any railroad company or other common carrier." (Kousser Report 2020, ¶ 29).

206. Additionally, § 1.01(6), Fla. Stat. (1967) provided that "the words 'Negro,' 'colored,' 'colored persons,' 'mulatto,' or 'persons of color,' when applied to persons, include every person having one-eighth or more of African or Negro blood." (Kousser Report 2020, ¶ 29).

207. The three African-American legislators who served during Gov. Reubin Askew's first administration from 1970-74 pressed the governor unsuccessfully for an affirmative action plan, but Askew did oppose a return to segregated schools, he appointed the South's first black member of a state supreme court, and he liberalized the executive clemency program, making it easier for black people who had been convicted of felonies to vote. (Kousser Report 2020, ¶ 30).

208. Askew's policies on executive clemency were continued by his successor as governor, Bob Graham. (Kousser Report 2020, ¶ 30).

209. In the later gubernatorial administrations of Republican Bob Martinez and Democrat Lawton Chiles from 1986 through 1998, however, the number of former felons who were granted executive clemency, and thus, were eligible to register to vote, declined drastically. (Kousser Report 2020, ¶ 30).

210. The State government of Florida has not been responsive to the particularized needs of minorities. Not only did the State refuse to extend Medicaid under the Affordable Care Act, but it also joined the Texas-led lawsuit, now pending in the U.S. Supreme Court, which aims to overthrow the ACA entirely. (Kousser Report 2020, ¶ 21).

211. Florida's rate of uninsured adults is considerably higher for minorities than for African Americans and Latinos. (Kousser Report 2020, ¶ 21).

212. The same is true for children. In 2018, Florida had the sixth highest rate of

uninsured children of any state in the nation. From 2016 to 2018 in the state, the proportion of Latinx children without health insurance rose by 20%, and that rate was 1.25 times as high as the rate for Florida's children as a whole. (Kousser Report 2020, ¶ 21).

213. The most important example of a lack of responsiveness by Florida's state government to the particularized needs of minorities and the one most relevant to this case is the State's refusal to expand Medicaid under the Affordable Care Act. (Kousser Report 2020, ¶ 21).

214. That failure, an editorial in the *Tampa Bay Times* and *Miami Herald* noted, disproportionately affects minority residents.... This should be a top 2020 election issue for all voters, but particularly for voters in low-income minority neighborhoods.... Instead of embracing Medicaid expansion, House Republicans passed new work requirements for current Medicaid recipients that the Senate fortunately did not take up. (Paulson 2013c).

215. Attorney General Ashley Moody has kept Florida as a plaintiff in a federal lawsuit that seeks to overturn the entire Affordable Care Act, which includes Medicaid expansion.

216. Thirty-six states had expanded Medicaid by February 2020. Florida was not one of them. (Kousser Report 2020, ¶ 70).

217. In 2018, Florida had the sixth highest rate of uninsured children in the nation – higher than every other southern state except Texas and Georgia. (Kousser Report 2020, ¶ 70).

218. The percentage of uninsured children in Florida had risen by a percentage point since 2016, the sixth highest rise of any state in the country. (Kousser Report 2020, ¶ 70).

219. Between 2016 and 2018, the number of uninsured Latino children in Florida grew by more than 20%. (Kousser Report 2020, ¶ 70).

220. The proportion of Latinx children without health insurance in Florida in 2018 was

9.6%, far higher than the state average for all groups of 7.6%. Among the states, Florida ranked fifth highest in the uninsured percentage of Latinx children. (Kousser Report 2020, ¶ 70).

221. The state also suspends driver's licenses not just for traffic infractions, but also as a penalty for failing to pay any court fines. In 2017, one out of every 15 Florida drivers had their license suspended. (Kousser Report 2020, ¶ 71).

222. A case study found that the licenses of Black people were suspended at 1.6 times their proportion in the population. (Kousser Report 2020, ¶ 71).

223. The license suspension policy, which, like the State's felon disfranchisement policies under S.B.7066, differentially penalize those too poor to pay fines, could certainly make it more difficult for minorities to participate in the COVID-impacted elections of November 2020. (Kousser Report 2020, ¶ 72).

224. Florida has been much less responsive than other states to the implications of the COVID-19 crisis for the election system. In that sense, the State's policies have been quite tenuous. (Kousser Report 2020, ¶ 76).

225. Since the beginning of 2020, at least 23 states and the District of Columbia have changed their election laws to deal with the crisis - red states and blue states, southern and Midwestern and northern and coastal and land-locked - but not Florida. (Kousser Report 2020, ¶ 75).

226. Florida was one of the last two of the fifty states to decide to apply for the proffered federal grant of $20 million to help its election system respond to the crisis - to recruit poll workers when the regular, older ones are afraid to mix with crowds, to provide hand sanitizer for every voter, to acquire new polling sites, to send out massive numbers of absentee ballot requests and to process and count those that come back. (Kousser Report 2020, ¶ 76).

227. Black neighborhood residents in Districts 7, 8, 9, and 10 have brought public media attention to the dismal conditions in their communities. (Clark 2020).

228. In 2020, the representatives of several organizations joined together under the name of the Jacksonville African-American Civic and Social Organizations to advocate for social justice on behalf of the residents of these districts. (Clark 2020).

229. These groups included the NAACP, SCLC, African American Ministers Leadership Council, D.W. Perkins Bar Association, Martin Luther King Jr. Memorial Foundation, Northside Coalition, Eighth and Whitner Group, Sherwood Forest/Paradise Park Community Association, and Take 'Em Down Jacksonville. (Clark 2020).

230. Their group is seeking the formation of a City Council Black Caucus that would "long-neglected health and economic disparities and other issues that negatively affect the black community." (Clark 2020).

231. Neighborhoods with large Black populations in Districts 7, 8, 9, and 10 have suffered from neglect and a lack of responsiveness from local elected officials historically. For example, the Moncrief Park neighborhood in District 8 has a per capita income rate ($13.076) that is half the Florida per capita income rate ($26,159) and a median household income ($19.,290) that is over half that of the city of Jacksonville ($48,256) (Area vibes 2022).

232. The Moncrief Park neighborhood has also consistently ranked among the most dangerous neighborhoods in Jacksonville (Minor and White 2015).

233. Black citizens residing in Soutel Drive neighborhood and others in Northwest Jacksonville have complained about the lack of businesses and other forms of economic development in the area. (Amaro 2021).

234. In June 2021, Eunice Barnum, a resident of District 10 and President of the

Sherwood Forest /Paradise Park Community Association emailed local officials arguing, "It is my understating that the Soutel corridor has the largest population of black-owned business in this city. . . . They're not just getting their fair share of the revenue. . . . We are still fighting about septic tanks and we are having to beg for proper street lights." (Amaro 2021).

235. The residents of the city's urban core neighborhoods have attempted to publicize unresolved problems associated with problems such as illegal dumping, graffiti, unsecured vacant homes, and potholes for several years, but these problems continue to disproportionately plague these neighborhoods (many of which are located in Districts 7, 8, 9, and 10) (Marron 2021).

The proportionality factor asks whether minority voters form effective voting majorities in a number of districts roughly proportional to the minority voters' respective shares in the voting-age population.

236. In conclusion, approximately 28% of Jacksonville's voters are Black/African America according to Duval County Supervisor of Elections data (Duval County Supervisor of Elections 2022). If Black voters are able to elect their candidates of choice in four out of 14 City Council districts, that would give them approximately 28% of those seats and therefore allow them to elect representatives in districts roughly proportional to their share of the voting age population. Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the forgoing is true and correct:

Executed, this day, November 18, 2022, in Middleburg, Florida.

Dr. Sharon Austin

Dr. Sharon Austin

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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.
_______________________________/

DECLARATION OF NICHOLAS WARREN

I, Nicholas Warren, pursuant to 28 U.S.C. § 1746, hereby declare the following:

1. I am one of the attorneys representing Plaintiffs in the above-captioned matter. I make this declaration based on my personal knowledge and in support of Plaintiffs' Objections to the City's Proposed Remedial Plan dated November 18, 2022.

2. Attached as Exhibit A is a true and correct copy of the news article: Lucia Viti, *A Court Blocks City Council and School Board Maps Signed into Law by Mayor Lenny Curry in March*, ACTIONNEWSJAX (Oct. 18, 2022), https://www.actionnewsjax.com/news/local/court-blocks-city-council-school-board-maps-signed-into-law-by-mayor-lenny-curry-march/2ENNEN65CZA6JMJJWRGUO22GMY/ [https://perma.cc/5ZHP-YEF8].

3. Attached as Exhibit B is a true and correct copy of the news article:

Andrew Pantazi, *Jacksonville Hires Redistricting Expert to Draw New Maps After Racial Gerrymandering Ruling*, TRIBUTARY (Oct. 21, 2022), https://jaxtrib.org/?p=3303 [https://perma.cc/6JK2-TVRC].

4. Attached as Exhibit C is a true and correct copy of the news article: Andrew Pantazi, *Plaintiffs Propose New Jacksonville City Council Map*, TRIBUTARY (Oct. 28, 2022), https://jaxtrib.org/?p=3339 [https://perma.cc/7DJ3-3J3J], and the table embedded in the article, available separately at https://docs.google.com/spreadsheets/d/e/2PACX-1vQ96mnp2S1uHXjRym8WIFnGyb36VhCACcDs8lwsnmclJaGPelokysSCeAVExjS-rLbP8G0bPL-DtOyZ/pubhtml?gid=0&single=true [https://perma.cc/KT37-WRYS].

5. Attached as Exhibit D is a true and correct copy of the news article: Jim Piggott, *'A Sham and A Scam!': Debate Over City Council, School Board Maps Heats Up as Work To Redraw Begins*, NEWS4JAX (Nov. 1, 2022), https://www.news4jax.com/news/local/2022/11/01/a-sham-and-a-scam-debate-over-city-council-school-board-maps-heats-up-as-work-to-redraw-begins/ [https://perma.cc/NZ88-VT7Q].

6. Attached as Exhibit E is a true and correct copy of the news article: Jim Piggott, *City Council Committee Narrows Down New District Maps to One Choice, but Pushback Continues*, NEWS4JAX, (Nov. 2, 2022), https://www.news4jax.com/news/local/2022/11/02/city-council-committee-narrows-down-new-district-maps-to-one-choice-but-pushback-continues/

[https://perma.cc/2LGK-WRZK].

7. Attached as Exhibit F is a true and correct copy of the news article: Andrew Pantazi, *City Lawyer: Jacksonville Doesn't Need Compact City Council Districts Despite Charter Requirement*, TRIBUTARY (Nov. 3, 2022), https://jaxtrib.org/?p=3396 [https://perma.cc/5G29-A3R9].

8. Attached as Exhibit G is a true and correct copy of the news article: Andrew Pantazi, *Jacksonville City Council Passes New District Map After Racial Gerrymandering Ruling*, TRIBUTARY (Nov. 7, 2022), https://jaxtrib.org/?p=3444 [https://perma.cc/PSV3-8ZY6].

9. Attached as Exhibit H is a true and correct copy of the news article: Tarik Minor, *Property Appraiser Says Redrawing Riverside-Avondale District Was a Necessity Due to Growth*, NEWS4JAX (Nov. 7, 2022), https://www.news4jax.com/news/local/2022/11/07/property-appraiser-says-redrawing-riverside-avondale-district-was-a-necessity-due-to-growth/ [https://perma.cc/MED3-VNNH].

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 18th day of November, 2022.

/s/ Nicholas Warren
Nicholas Warren

CBS47 FOX30 ACTION NEWS JAX

LOCAL

A court blocks City Council and School Board Maps signed into law by Mayor Lenny Curry in March

By **Lucia Viti**
October 18, 2022 at 10:29 am EDT

JACKSNVILLE, Fla. — A court issued injunction is blocking recently redrawn City Council and School Board Maps signed into law by Mayor Lenny Curry in March.

The preliminary injunction motion was introduced in litigation by the Jacksonville Branch of the NAACP which accused the Jacksonville City Council and School Board maps of racial gerrymandering. The litigation also challenges Duval County School Board Districts 4, 5 and 6.

The Honorable Judge Marcia Morales Howard agreed with the Jacksonville Branch of the NAACP, ruling that the new maps promoted "unnecessary racial segregation." The judge ordered the Jacksonville City Council to redraw new maps by November 8, although they will not affect City Council elections until 2023.

In a recently released statement, City Council President, Terrance Freeman said, "The Council disagrees with the outcome of the Court order. Therefore, we have directed the Office of General Counsel to appeal the decision. While we await the appeal, the Council will begin a new redistricting process immediately given the court order and the short window established by the District Court."

Council Member Rory Diamond, the sole vote against the March maps explained that new maps usually spark friction between Republicans and Democrats.

"Maps are redrawn every 10 years," he said. "If Republicans are in charge, they write a good map for them, and if Democrats are in charge, they write a good map for them."

Diamond described what the City Council did as “good” adding that “no one did anything wrong.”

“But this injunction’s also a good thing,” he continued. “If the judge believes that there’s enough evidence that the maps are unconstitutional, we must follow the law.”

Diamond explained that lawsuit filed against the City Council argued that too many African American Democrats were placed in urban districts, “thereby diluting their voice.”

“The other view,” he continued, “you place African American Democrats into a district in order to ensure that an African American Democrat can elect someone who can represent them.”

Diamond concluded that regardless, “the judge has clearly ordered us to start with a clean sheet of paper, so that’s what we are going to do.”

The Jacksonville Branch of the NAACP vs. City of Jacksonville was filed by the Jacksonville NAACP Branch, the Northside Coalition of Jacksonville, the Northeast Chapter of the ACLU of Florida, Florida Rising and 10 individual residents.

To date, the City Council says they will appeal the ruling.

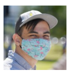
Lucia Viti

Lucia Viti is a seasoned journalist, photojournalist, and published author and works as a reporter for WOKV News. Lucia is a graduate of the University of West Virginia with a Bachelor of Science Degree in Journalism.

CHANGING FLORIDA

Jacksonville hires redistricting expert to draw new maps after racial gerrymandering ruling

City Council President Terrance Freeman wouldn't say who would be advising the expert before he draws new maps.



by **Andrew Pantazi**
October 20, 2022 Updated October 21, 2022

City Council President Terrance Freeman answering questions after the Oct. 20 redistricting committee meeting. [Andrew Pantazi/The Tributary]

A day after Jacksonville argued in court that **it didn't have enough time** to pass new redistricting maps, City Council President Terrance Freeman rejected that.

"The charge of this committee is to complete new maps," he said at the beginning of the first redistricting committee meeting. "And we will do so. This committee will meet the court's established timeline."

Last week, U.S. District Judge Marcia Morales Howard **prohibited Jacksonville** from using City Council and Duval School Board district maps it passed earlier this year, **finding the districts were likely racially gerrymandered**. In response, **the city said** Wednesday her deadline of passing a new map by Nov. 8 was too onerous.

In fact, Freeman said Thursday that the Council would pass a new map by Nov. 4, four days before the court's deadline. The council will do so with a new redistricting consultant hired by the city's lawyers to help with drawing maps and with the federal court case as an expert witness.

Douglas Johnson of the National Demographics Corporation will provide a map to the council on Nov. 1, at which time Freeman said the council could offer feedback.

What else do I need to know?

The Tributary has been covering local redistricting for more than a year. Here is a sample of our past coverage:

Jacksonville's redistricting plan risks racial gerrymandering claims, experts say
Jacksonville redistricting plan splits dozens of neighborhoods
Jacksonville's redistricting plans ignore federal guidelines
For decades, Jacksonville City Council redistricted based off 'misinformation'
'They're not compact. They're sprawling.': Federal judge probes Jacksonville City Council redistricting
'Racial segregation': Federal judge blocks Jacksonville City Council districts as racial gerrymanders
INTERACTIVE: HOW JACKSONVILLE'S CITY COUNCIL DISTRICTS SORT RESIDENTS BY RACE
INTERACTIVE: HOW JACKSONVILLE'S MAP SPLITS NEIGHBORHOODS

Whatever map the City Council passes, city attorney Mary Margaret Giannini told the committee, must be a “wholesale review of the city districts”.

“What you can’t do in this process is start with the premise that the 2011 lines are OK and merely tinker around the edges,” she said.

The City Council committee didn’t approve any standards or criteria to give Johnson when he draws maps. Freeman said he didn’t want anyone talking about maps until after Johnson submitted drafts. “My goal is to try to not get ahead of the process with our map drawer,” he said. “I want to avoid any situation where we’re getting into some rabbit trails.”

Giannini told the committee Johnson would “craft a variety of maps for your review and consideration.”

Members of the public can submit comments or ask questions of the council by emailing 2022redistricting@coj.net, Freeman said, or by attending the City Council meeting next Tuesday or the special redistricting committee meetings at noon on Nov. 1, Nov. 2 and Nov. 3.

Freeman said he would also host a “Map Chat” town hall on the evening of Nov. 3.

Freeman wouldn’t answer questions about who would advise Johnson as he draws the maps. He also wouldn’t say if he would be speaking to Johnson, only saying he would defer to city lawyers on answering the question.

Gaffney asked if the council members could meet one-on-one with Johnson in private about his maps. Giannini said that she would take that under consideration.

City Councilman Aaron Bowman, who served as the previous redistricting chairman, said Giannini’s response was “concerning” because the City Council, not the Office of General Counsel, was responsible for drawing new maps, and the Council should decide if it can talk to the expert. “The maps are ours,” he said. “The maps belong to the City Council and do not belong to the attorneys.

"I would say it's up to you," Bowman said to Gaffney and Freeman. "... It's not going to be talked in the attorney's office. Can we talk here?"

Later, during public comment, one citizen, Carnell Oliver, criticized Bowman's reaction.

"You're wrong," Oliver said. "You have no control over the redistricting process. These seats belong to the people. You were given an opportunity to address this critical issue. It went to the federal courts, and this injunction came into place. You lost your seat" at the table.

City Councilman Rory Diamond, the only council member to vote against the plan that was struck down, said he believed "the most likely scenario is that the new map is going to be different than what we've seen here in Jacksonville since around 1991" **when the council drew four districts that were at least 63% Black**.

Even if the City Council wins its appeal of the court order, Diamond pointed out that wouldn't stop a **full racial gerrymandering trial** next year.

Bowman warned that the appeal could lead to late changes that add confusion just before the 2023 election.

"We've got a court order. And we've got a deadline coming up. And we don't need to discuss how that plays out now. But I can tell you that it's heavy in my mind right now that we've got a potential explosion heading our way in December. ... The quicker we get that [appeal] in I think is best for all of us."

City Councilman Matt Carlucci, who said he wouldn't be in town for the vote on the maps on Nov. 4, said the council should think about what's right for the citizens of Jacksonville, regardless of how appellate courts rule. He was the only one to say he opposed the decision to appeal the court order.

"Regardless of the court ruling, we should strive to make these districts more compact, taking care of communities within those districts," he said. "But I believe we absolutely must reflect a better diversity of party, thus opening up more opportunities for people of all colors, races or ethnicities to have a shot at winning a race."

"… If we don't do that, we're letting — forgetting the courts, forgetting the appeals, I think we're letting our community down. So as the maps begin to be drawn, again, I really would suggest that we more highly look at these districts that are safe and diversify them out. That will have an impact on other districts. But I believe it can have a more positive impact on other districts. And if we don't do that, I think we might be making a mistake."

"… I believe we will be letting not the courts down," he concluded. "I believe we will be letting our people down."

CHANGING FLORIDA

Plaintiffs propose new Jacksonville City Council map

by **Andrew Pantazi**
October 28, 2022

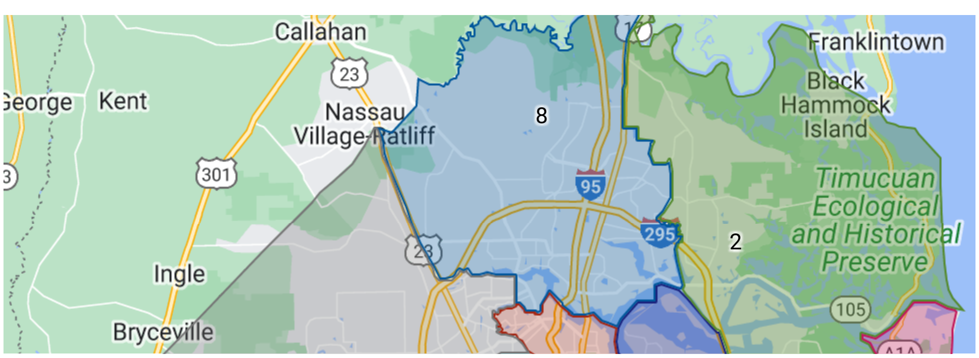
Jacksonville City Council members received **a map proposal** this week from the same plaintiffs who successfully argued the city's previous districts were racially gerrymandered.

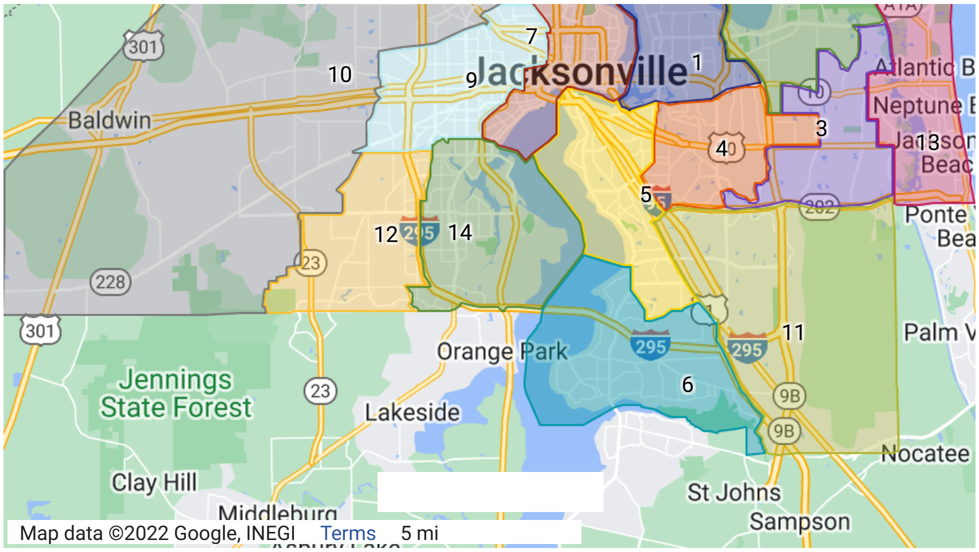
The Jacksonville Branch of the NAACP and other civil rights groups and voters **sued the city**, arguing the city had **racially gerrymandered its City Council and Duval County School Board maps**. **A federal court said** they were likely to win their lawsuit and barred the city from using those maps, saying the gerrymandered districts had segregated voters based on race.

"The '**Unity Map**' we submit to you presents a new vision for the city of Jacksonville, one that moves us forward, rather than backward," said Marcella Washington, a former Florida State College at Jacksonville political science professor and a plaintiff in the case, at the City Council's Tuesday meeting.

Jax Plaintiffs' Unity Map

This map was made with Google My Maps. Create your





The City Council redistricting committee expects to receive its first drafts from the city's experts on Nov. 1. Some council members said they planned to talk to the expert one-on-one before the public meeting. The court ordered the city to pass a new map by Nov. 8.

Ben Frazier, another plaintiff in the case, urged the council to accept the map proposal as an olive branch. "We're asking you to bring new maps, maps that can bring about togetherness in our community," Frazier said. "It's time for us to bury some damn hatchets. It's time for us to offer and accept all the branches of peace. Is there something wrong with that? We want to work with you We want to make this one city, one that is too busy to hate."

Council members want to protect incumbents

Most council members declined to weigh in on the proposed map, but some noted concerns.

The Tributary will be [tracking City Council members' thoughts](#).

City Council comments on redistricting :

Name	District	
Joyce Morgan	1	
Al Ferraro	2	
Aaron Bowman	3	I'm in London. No comments on an open law
Kevin Carrico	4	
Leanna Cumber	5	
		I only received a copy last night with no oppo

Michael Boylan	6	helpful.
Reggie Gaffney	7	It would be unfair to draw me out of a district. someone who doesn't live in Jacksonville try
Ju'Coby Pittman	8	
Tyrona Clark-Murray	9	
		If during the redistricting process in 1991, 20(underlying the redistricting process & decisio issues germane to the current redistricting liti 10 were constitutional & permissible under th

Four said the map must take into account where incumbents live.

The proposed map didn't pair any council incumbents who were running for re-election as of Tuesday, but a day later, District 10's Brenda Priestly Jackson, who had been running for a citywide seat, **announced she was going to run for re-election instead**. She and District 12's Randy White would be in the same district.

On Twitter, **Priestly Jackson also said** demographic data on the map was "an essential piece of info that's missing. Maybe the plaintiffs will provide those data points soon."

Councilman Reggie Gaffney, who filed resignation paperwork so he could run for state senate, worried about which district his house would be in. Although he's not running for re-election, his son, who lives with him, is running to replace him.

"It would be unfair to draw me out of a district," the term-limited Gaffney said.

Gaffney said it looked like the new map would've drawn him and Councilwoman Ju'Coby Pittman into the same district. That's actually not true. Pittman's home would be in a new Urban Core-based District 7, and Gaffney's home would be the only council members' home in a new north-of-the-Trout-River District 8.

Gaffney also said that if the council accepted reducing the Black populations in the four Black-majority districts, it could lead to the court striking down state Senate District 5, the district where Gaffney lost in the August primaries, for being too Black.

That comparison is peculiar because the four districts he referred to all would have a larger Black population than the Senate district. Senate District 5 is 41.6% Black voting-age population, while the four council districts he referred to would range from 48.4% to 56% Black voting-age population.

Other council members highlighted similar concerns.

Councilman Rory Diamond, one of the vice chairs on the redistricting committee, told the Tributary he hadn't looked at the data yet, but he thought if the proposed map were passed, "African American Democratic representation on the Council would go down and cause a new set of plaintiffs to file suit."

Still, **he told News4Jax** the council should look "at every map that comes from the public. These are plaintiffs, so you'd be crazy not to look at what they're presenting."

Councilman Matt Carlucci similarly said the map was "a good product for Council members to start weighing in on." He praised the map, saying it appeared to "be more compact and politically diverse and thoughtfully done." Still, he said he would need to review the districts more.

Councilwoman Randy DeFoor said that after listening to her constituents, she believed one district should hold Riverside, Avondale, Murray Hill and Ortega. Currently, and in the City Council's struck-down map, Murray Hill is split between districts. In the plaintiffs' map, Murray Hill and Ortega would be in their own districts, separate from a district that would contain all of Riverside and Avondale.

Councilman Danny Becton said in a text message he had five principles he would use to weigh any new map: communities of interest, compactness, contiguity, following natural boundaries and not drawing any incumbents out of their districts.

"As this process plays out, it will be those principles for which I will use to support any changes," Becton said. "As for now, I have not had the opportunity to hear any discussion as to how the map presented last night or any other map to be presented meets those principles to provide for the best configuration possible for our city."

Council Vice President Ron Salem said he wanted the map to take into account where incumbents and filed candidates live.

“If you’ve based your campaign on running against a particular person and now you’re moved into a different district — we need to make an effort to limit that as much as we can,” Salem said. “Any map I look at, I want that plotted on there.”

Council members Nick Howland and Michael Boylan said they were still studying the map and couldn’t yet offer any thoughts.

Having it before the committee meets next week is very helpful, Boylan said.

Councilman Aaron Bowman said he wouldn’t comment on the maps because of the pending litigation.

Council members Joyce Morgan, Al Ferraro, Kevin Carrico, LeAnna Cumber, Ju’Coby Pittman, Tyrona Clark-Murray, Randy White and Terrance Freeman have not yet returned requests for comment.

Proposed map’s data

U.S. District Judge Marcia Morales Howard found that the Jacksonville City Council’s map segregated voters on the basis of race, packing Black voters into four of the council’s 14 districts, which reduced their overall voting power and “bleached” three surrounding districts by making them whiter.

In the plaintiffs’ proposed map, a majority of people in four districts would still be Black, but the percentages would fall from the earlier map. Those districts would now range from 50% to 60% Black, compared to the City Council’s map that drew four districts that ranged from 61% Black to 70% Black.

The surrounding three districts would now be 21% Black, 43% Black and 36% Black. In one of those districts, District 12, Black residents would now outnumber white residents. The City Council’s earlier map made those districts 21% Black, 33% Black and 21% Black.

The City Council redistricting committee expects to receive its first drafts from the city’s experts on Nov. 1. Some council members said they planned to talk to the expert one-on-one before the public meeting. The court ordered the city to pass a new map by Nov. 8.

The proposed map only changes eight districts, the seven primarily on the Northside and Westside that plaintiffs challenged, plus a relatively minor change to District 3, moving some East Arlington neighborhoods into District 2.

SEE ALSO: ANALYSIS – WHAT COULD JACKSONVILLE CITY COUNCIL MAPS LOOK LIKE?

To draw districts protected by the Voting Rights Act, the plaintiffs will likely need to show Black voters would be able to elect their preferred candidates in four of the districts.

The Tributary **analyzed 16 elections** across the proposed City Council districts, including:

the 2015 May mayoral race and At Large Group 5 election; the 2016 presidential and U.S. Senate; the 2018 elections for governor, chief financial officer, attorney general, agriculture commissioner and senate, and a special election for Duval County tax collector; the 2019 march tax collectors' race; both of the 2020 elections for U.S. House of Representatives and the elections for president and clerk of courts; the August 2022 sheriff election.

Democrats would've won three of those districts all 16 times, a fourth district 15 times and a fifth district 14 times.

In four districts, Black voters made up a majority of the people who cast ballots across those elections.

Draw	District	Total Population	All Black Population	All Black Voting Age Population	Avg Black Turnout	Single-Race Non-Hispanic White Population	Single-Race Non-Hispanic White Voting Age Population	D Wins	2020 Pres	2018 Gov	2018 AG	2018 CFO	2018 AgC	2018 Sen	2016 Pres	2016 Sen	Sheriff 2022 Aug D-margin	Tax 2019 March D-margin	Gov 2018 Nov D-margin	AtLarge5 2015 May d-margin	Clerk 2020 Nov D-margin	Mayor 2015 May D-margin	Congress 2020 Nov D-margin	Tax 2018 Nov D-margin
UNITY	1	72718	38.6%	35.1%	32.2%	40.8%	44.7%	13	10.8%	12.7%	6.2%	6.6%	8.3%	9.4%	6.2%	-9.9%	14.4%	-5.9%	12.9%	-0.8%	5.4%	2.0%	11.7%	6.2%
UNITY	2	67965	20.9%	19.3%	18.5%	59.3%	61.9%	0	-18.8%	-20.7%	-26.8%	-25.9%	-23.4%	-23.1%	-26.7%	-38.1%	-13.6%	-36.2%	-20.9%	-30.4%	-24.9%	-28.2%	-18.4%	-24.0%
UNITY	3	71310	13.2%	12.6%	11.0%	60.9%	63.0%	0	-11.4%	-13.2%	-20.7%	-20.5%	-16.1%	-16.2%	-18.2%	-35.5%	-13.3%	-38.7%	-13.2%	-32.4%	-20.6%	-28.6%	-12.7%	-18.8%
UNITY	4	71923	19.8%	18.0%	16.9%	49.4%	53.2%	0	-7.5%	-6.9%	-13.8%	-13.5%	-10.5%	-9.3%	-11.6%	-26.4%	-5.9%	-32.3%	-7.0%	-23.8%	-12.7%	-22.5%	-6.3%	-12.4%
UNITY	5	74180	18.9%	17.3%	13.6%	55.9%	59.9%	1	-2.8%	-4.4%	-13.5%	-11.2%	-8.9%	-6.6%	-8.0%	-24.5%	0.5%	-29.4%	-4.4%	-14.3%	-11.0%	-17.6%	-4.2%	-13.0%
UNITY	6	72247	9.2%	8.3%	7.1%	71.0%	73.6%	0	-24.8%	-28.8%	-35.7%	-34.5%	-31.7%	-30.0%	-32.8%	-45.6%	-20.5%	-43.9%	-29.0%	-38.2%	-32.3%	-38.1%	-25.0%	-33.9%
UNITY	7	68211	59.8%	55.8%	52.1%	32.8%	36.9%	16	55.6%	58.8%	50.6%	52.0%	53.4%	55.1%	53.4%	33.3%	60.3%	36.4%	59.1%	57.5%	48.9%	56.1%	55.4%	47.6%
UNITY	8	68949	56.5%	54.1%	60.8%	33.2%	35.7%	16	31.3%	37.8%	33.3%	33.7%	34.6%	34.5%	29.1%	15.6%	41.1%	22.9%	38.1%	38.8%	26.7%	37.7%	33.0%	34.9%
UNITY	9	68143	59.7%	56.3%	54.6%	31.0%	34.4%	16	38.4%	43.1%	36.9%	38.1%	38.4%	39.8%	37.3%	21.0%	43.0%	18.7%	43.6%	41.6%	33.1%	41.0%	40.2%	37.8%
UNITY	10	72261	50.2%	48.4%	51.5%	40.2%	42.5%	15	12.8%	17.1%	13.1%	13.1%	13.9%	14.5%	11.1%	-0.1%	18.6%	1.8%	17.4%	19.7%	7.9%	20.1%	14.7%	15.2%
UNITY	11	73503	17.9%	16.5%	15.1%	54.6%	57.7%	2	1.4%	-1.4%	-8.5%	-8.0%	-4.6%	-4.3%	-6.7%	-24.8%	0.0%	-30.1%	-1.4%	-20.9%	-6.1%	-21.5%	0.3%	-7.3%
UNITY	12	68181	43.2%	39.7%	41.1%	36.2%	39.9%	14	12.9%	15.4%	9.3%	10.1%	11.0%	11.6%	6.6%	-8.8%	15.1%	-14.3%	15.6%	4.8%	7.8%	6.5%	13.9%	11.1%
UNITY	13	74348	8.4%	7.5%	4.1%	77.1%	79.1%	0	-18.6%	-19.6%	-27.6%	-27.6%	-22.1%	-20.9%	-25.6%	-38.0%	-16.5%	-38.0%	-19.8%	-32.0%	-28.3%	-33.2%	-18.5%	-28.0%
UNITY	14	71628	35.9%	31.7%	23.9%	45.8%	50.3%	4	1.7%	0.7%	-7.3%	-5.8%	-3.4%	-2.3%	-6.0%	-20.0%	-2.3%	-33.3%	0.7%	-12.6%	-4.4%	-16.3%	2.1%	-7.6%

The 14 districts of the Unity Map across 16 elections. [Andrew Pantazi/The Tributary]

City Council comments on redistricting:

Name	District	Comment	Source
Joyce Morgan	1		
Al Ferraro	2		
Aaron Bowman	3	I'm in London. No comments on an open lawsuit.	Text
Kevin Carrico	4		
Leanna Cumber	5		
Michael Boylan	6	I only received a copy last night with no opportunity to study it as yet. Having it hand for the current committee to review is very helpful.	Text
Reggie Gaffney	7	It would be unfair to draw me out of a district. Does the state senate map need to be redrawn [if we pass this]? You can't have someone who doesn't live in Jacksonville try to redistrict.	In-Person interview
Ju'Coby Pittman	8		
Tyrona Clark-Murray	9		
Brenda Priestly Jackson	10	If during the redistricting process in 1991, 2001 & 2011, race was the predominant factor in creating Districts 7, 8, 9 & 10, the facts underlying the redistricting process & decisions made by prior City Councils (CMs) during those redistricting processes are the issues germane to the current redistricting litigation. Whether or not considerations of race for Black neighbors in Districts 7, 8, 9 & 10 were constitutional & permissible under the 14th Amendment in '91, '01 & '11 are the issues to be addressed during trial & discovery. Were the CMs involved in prior redistricting efforts ('91, '01, '11) deposed or have they offered any evidence of the basis for the factors they considered during redistricting? A trial on the merits is required to address these fundamental issues that are central to Jax Charter. An order on a preliminary injunction on the issues of whether or not considerations of race complied with both the 14th A & VRA is premature. Those issues must be understood, addressed & resolved on the merits at trial…otherwise it's another example of #revisionisthistory. ✌🏽🌻	Tweet
Danny Becton	11	I have always advocated for redistricting maps, going back to my 2011 involvement, to be drawn based on the principles of: 1) Districts that respect Communities of Interest, 2) Districts that are Compact, 3) Districts that are Contiguous, 4) Districts that take into account Natural Boundaries and finally 5) Incumbencies of current public officials (not writing anyone out of their elected area). As this	Text

		process plays out, it will be those principles for which I will use to support any changes. As for now, I have not had the opportunity to hear any discussion as to how the map presented last night or any other map to be presented, meets those principles to provide for the best configuration possible for our city.	
Randy White	12		
Rory Diamond	13	Haven't looked at the numbers yet. But, I think if it were passed, African American Democratic representation on the Council would go down and cause a new set of plaintiffs to file suit.	Text
Randy DeFoor	14	I think Riverside, Avondale and Ortega as well as Murray Hill should stay together after listening to constituents.	Text
Ron Salem	At-large	"I got the map but have not studied. Is there anything that you have seen that has the incumbents identified as well as the candidates that have qualified? I would like to see that." "Any map I look at, any map, I have to look at the candidates who've opened up accounts, fundraising and have been running for any period of time and how they're affected by these lines. If you've based your campaign on running against a particular person and now you're moved into a different district, we need to make an effort to limit that as much as we can. Any map I look at, I want that plotted on there."	Phone call
Matt Carlucci	At-large	I'll be reviewing these maps in more detail but at first glance they seem to be more compact and politically diverse, and thoughtfully done. I can't say these are perfect, which is why I personally need more time to review. Being sensitive to neighborhood nuances, how our communities already identify themselves, and where current Council members live have to be part of the conversation, too. What I've seen so far appears to better comply with the expectations of the court and it would be a good product for Council members to start weighing in on.	Text
Sam Newby	At-large	I'm on the redistricting committee, so I'm going to hold my opinion to myself because of that. I think it's best for me to not even comment on the map. I think the map we had was fine. [Guiding principle:] to have a fair map that all the citizens feel good about. Make sure that everybody's represented equally.	Phone call

		Brooklyn – it could either be part of Riverside or part of the new Springfield. It's kind of, like, in between. Brooklyn is unique. I think Brooklyn is probably going to becoming just like Jacksonville is going to be. It's very diverse. You have all different type of careers, different types of people there and I think that's what Jacksonville is heading to. *Have you talked to the redistricting expert yet?* No, not yet but I think I'll be talking to him on Friday.	
Nick Howland	At-large	I have not yet studied the [plaintiff's] maps, so no thoughts yet.	Text
Terrance Freeman	At-large		

News4JAX

'A sham and a scam!': Debate over City Council, school board maps heats up as work to redraw begins

A final vote during a special council meeting will happen on Friday

There were passionate moments on Tuesday over how to redraw city council and school district boundaries so that they do not diminish the voices of Black people in the Jacksonville community.

Jim Piggott, Reporter
Published: November 1, 2022 at 5:44 PM
Updated: November 1, 2022 at 10:55 PM

JACKSONVILLE, Fla. – There were passionate moments on Tuesday over how to redraw city council and school district boundaries so that they do not diminish the voices of Black people in the Jacksonville community.

"This entire process is a sham and a scam! You're not listening to the voice of the people," said Ben Frazier, who leads the Northside Coalition.

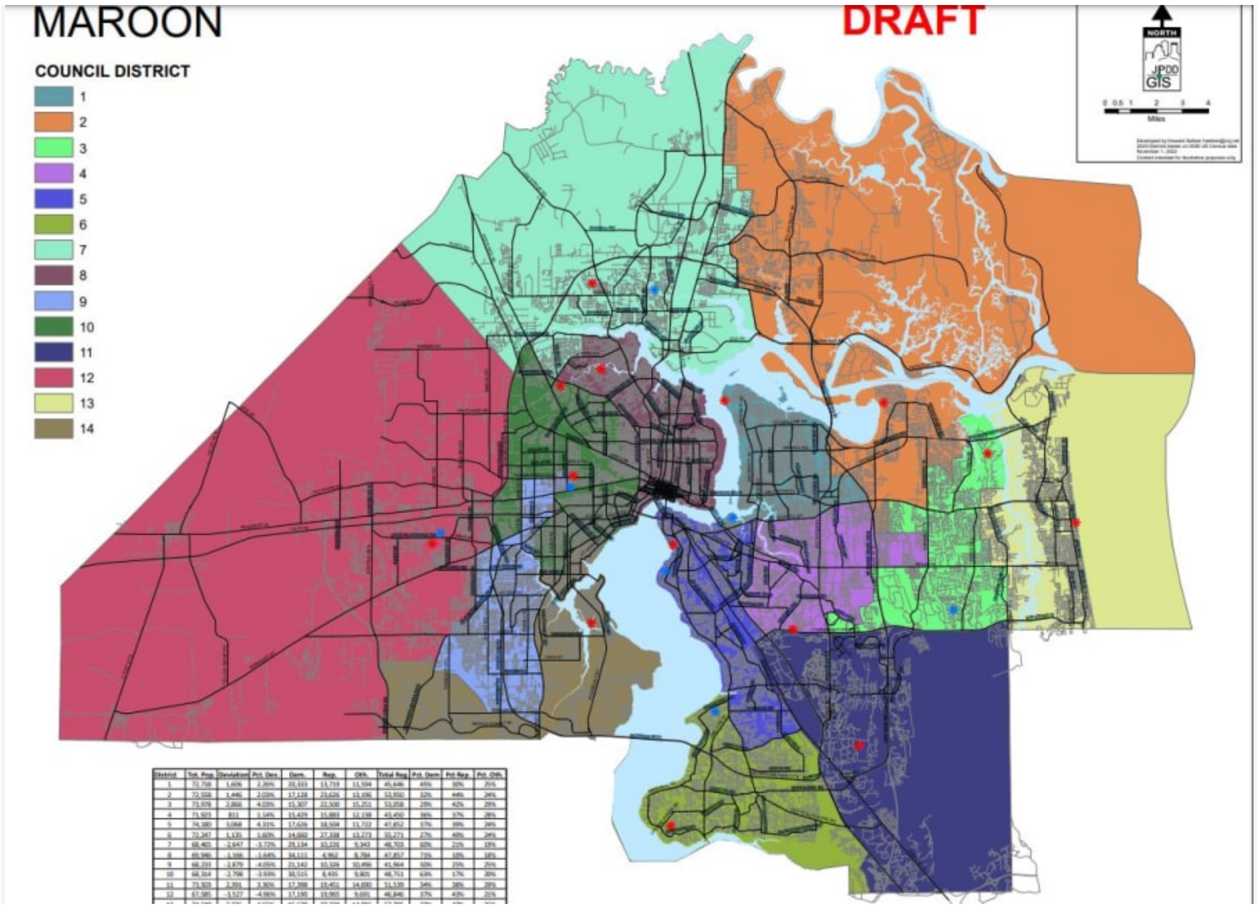
The districts are being redrawn again because a federal judge said the city used race to determine boundaries. The city council now has just seven days to come up with a new plan with the deadline being Nov. 8.

The maps discussed Tuesday came under fire by some after no one had a chance to study them before the council tossed some aside.

News4JAX was one of those questioning that decision not to release the maps before the meeting so the public and media could study them.

The special City Council committee was considering four maps on Tuesday but tossed two out, including one map **submitted by the plaintiffs** that brought the lawsuit that ultimately led to the judge's ruling.

The council will now consider two maps at another meeting on Wednesday where they will listen to public comment before making a decision on what map to move forward with. The maps have been dubbed **Lime** and **Maroon**.



Maroon map favored by city council members during Tuesday's meeting.

A lot of the council members seemed to favor the Maroon map.

Looking at the maps can be confusing and there was a lot of concern among the people that attended Tuesday's meeting that the decision had already been made before the public had a chance to weigh in.

As the council was preparing to begin the first of three meetings this week to draw the new maps, News4JAX was trying to get copies so we could study them to know what's being considered. The city's top lawyer refused to let that happen.

As the meeting started, the four maps first in play were discussed. But council members didn't go into a lot of detail about the difference between the maps. In fact, some of the maps that were projected on a screen were different from what was being handed out, and in an hour and 15 minutes, it was decided two of the maps, including the one from those who filed the lawsuit, were dismissed. That all happened even before the public had a chance to weigh in on the maps that they just saw. That was a major concern during public comments, which were limited to one minute.

In fact, Frazier blasted the council members and they turned off his microphone when his minute was up.

"You have awakened a sleeping giant. Black voters are awake," Frazier said.

Others questioned why they could not see the maps earlier.

"Why hold those maps until moments before the meeting started? Why couldn't they be public, they had them ready. Why wouldn't they publish them already and let people have an opportunity to really digest them?" Kim Pryor said.

And the head of the Duval Democratic Party said that is a major concern.

"For the council to spontaneously come up with two particular maps that they favorite the most within the span of an hour. Before they read any of the comments that were came in through email, before they took any the decision that Judge Howard made," Duval Democratic Party Chairman Daniel Henry said.

And that's the question News4JAX repeatedly asked Republican City Council President Terrance Freeman, who pushed back.

"I believe that their comments and concerns as they're making them are being heard. And if as we come and hopefully as we work through the process, you all will be back again tomorrow. And there's a chance that their considerations or thoughts or comments that one of my colleagues, myself, we agree with and we make that change to the map," Freeman said.

This is not over.

Three more meetings will be held. On Wednesday, the council group will only take up two maps and then narrow it down to one.

On Thursday, the committee will make its choice and then a town hall meeting for more public comment will take place Thursday night. A final vote during a special full city council meeting will happen on Friday.

Judge denies city's motion for stay

In October, after a federal judge issued an injunction that blocked the city from using its new City Council maps, the city filed an appeal.

As part of that appeal, the city also filed a motion to put a hold on the judge's injunction until the appeal played out.

On Tuesday, the judge ruled on that motion for a stay and denied it, going against the city.

That means that while the city continues its appeal, the city is still blocked from using its originally-passed maps in any upcoming elections.

The judge said that the city didn't present any argument that they were likely to win their appeal, one of the most critical factors in getting a stay pending appeal.

The city had argued that one reason for a stay was that a redistricting case from Alabama that's currently in front of the US Supreme Court could impact their case. The judge said no, the two cases are different enough that the Alabama case wouldn't have a significant impact on this case.

The city also argued that the deadline imposed by the judge wouldn't give them enough time to receive and respond to public input. But in the order, the judge says: "Significantly, despite defense counsel's arguments to the contrary, the City Council itself appears confident in its ability to meet the Court's deadline."

The order goes on to point out that Freeman opened the first meeting by saying they would meet the court's established timeline. The judge also pointed out that the committee only scheduled four meetings, with a 10-day gap between the first and second meetings.

ABOUT THE AUTHOR:

Jim Piggott

Jim Piggott is the reporter to count on when it comes to city government and how it will affect the community.

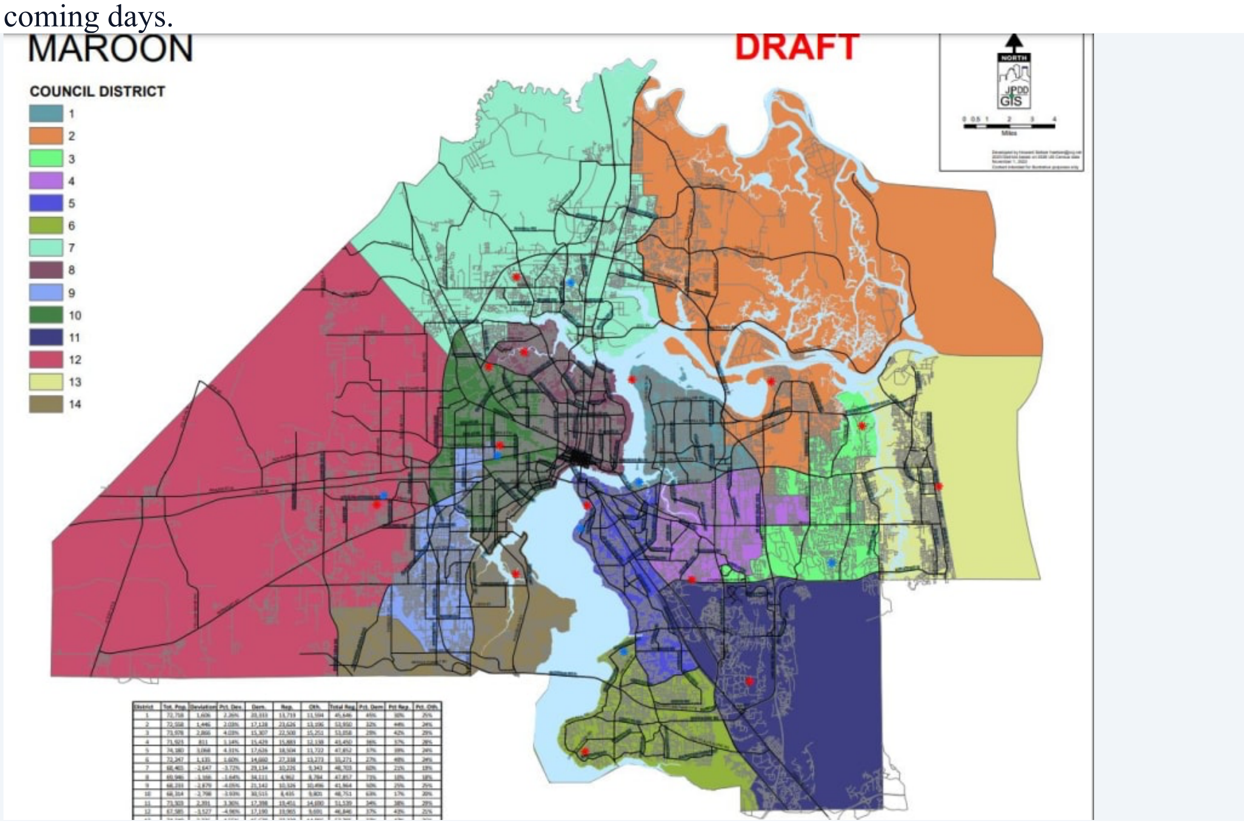
City Council committee narrows down new district maps to one choice, but pushback continues

Jim Piggott, Reporter
Published: November 2, 2022 at 3:47 PM
Updated: November 2, 2022 at 6:13 PM

JACKSONVILLE, Fla. – A special Jacksonville City Council committee narrowed down new city council and school district boundary maps from two choices to one on Wednesday, though its work is not done.

On Thursday, the committee will make its choice in maps official and then a town hall meeting for more public comment will take place Thursday night. A final vote during a special full city council meeting will happen on Friday.

The council had its pick between maps that have been dubbed "Lime" and "Maroon," and ultimately chose to move forward with "Maroon." It will now make tweaks to that map in the coming days.



Maroon map favored by city council members during Tuesday's meeting. (Copyright 2022 by WJXT News4Jax - All rights reserved.)

The districts are being redrawn because a federal judge said the city used race to determine previously passed boundaries, which is illegal. The city council now has just six days to finalize a new plan.

The committee met Tuesday to discuss four maps but came under fire by some after no one had a chance to study them before the council tossed two aside.

That changed on Wednesday, following reporting from News4JAX and other media, so that public comment was allowed before any of the maps were set aside.

Though some were happy about that change, there was still pushback concerning the Maroon maps from the groups that filed the lawsuit that led to redrawing process and the leader of the Riverside Avondale Preservation.

When Ayesha Franklin Covington spoke on Wednesday, she ripped up a proposed map to make a point. She was one of the plaintiffs who filed suit, the suit that lead to the city council being forced to come up with new boundaries.

“The judge has been very clear about her rulings concerning the voting rights act and we have to follow the law. These meetings are a waste of our time. We are not here for a fight, frankly, we already won the fight and what you’re doing is digging your heels in. Fighting with your constituents about a matter a federal judge has ruled on,” Covington said.

She was not alone. The committee heard from others not necessarily in a minority community, but those who live in the Avondale and Riverside areas. They are upset that their one council district could be divided up into three different ones.

“And my concern is if it’s split in three, that it will not get the representation that it deserves,” said councilwoman Randy Defoor, who represents the area.

After hearing from the public, the council began the work of changing the maps and moving some of the lines in neighborhoods. Council members voiced concerns about their districts.

“Basically, I was drawn out of my district,” councilwoman Ju’Coby Pittman said. “And so at the end of the day, we want to make sure that we, you know, keep the neighborhoods together, because, again, it’s a confusion with the residents and the businesses that are in those communities.”

The council’s maps under consideration could actually lead to less minority representation.

Daniel Henry who heads up the Duval Democratic Party said that should never happen if they follow the judge’s order.

Instead of using race to determine boundary lines, the committee can use political party registrations. For example, have a set number of registered Democrats or Republicans in an area. News4JAX asked City Council President Terrance Freeman about that.

"What we're really using is going off of the maps that will give them that we started with and we are trying to build this process out with my colleagues, that's going to be legal is going to be lawful, it's going to be transparent," Freeman said. "And as I said, today was a good day. It is a day that we have generated a lot of momentum, the work of my colleagues, the voices of the people, and I really look forward to continue that momentum into tomorrow."

ABOUT THE AUTHOR:

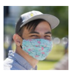
Jim Piggott

Jim Piggott is the reporter to count on when it comes to city government and how it will affect the community.

CHANGING FLORIDA

City lawyer: Jacksonville doesn't need compact city council districts despite charter requirement

The city's top attorney continued to say the council will not try to comply with the Voting Rights Act because the city's lawyers never did the necessary analysis.



by **Andrew Pantazi**
November 3, 2022

The Jacksonville City Council met Wednesday and will meet again on Thursday. [The Tributary]

Even as the city faces a lawsuit alleging it illegally passed non-compact districts, Jacksonville's top lawyer told City Council members they didn't need to worry about whether their new districts were oddly shaped or not.

"It's OK to have funny-looking districts," Jacksonville General Counsel Jason Teal said. "It's OK that they look like they are oddly shaped."

The city's charter — Jacksonville's local version of a constitution — **requires** "that all districts and at-large residence areas are as nearly equal in population and are arranged in a logical and compact geographic pattern to the extent possible."

U.S. District Judge Marcia Morales Howard **struck down** the city's earlier map as a racial gerrymander, saying the council districts and the county's School Board districts had segregated voters by race, violating the U.S. Constitution.

The city must pass new maps by Nov. 8, she ruled. The City Council's redistricting committee will meet again Thursday at 12 p.m. and at 5 p.m. before bringing a final map to the full Council on Friday at 9 a.m. for a vote.

Howard hasn't yet ruled on a separate part of the lawsuit alleging the district maps also violated the city charter's requirement for "logical and compact" districts, but throughout her order, she called the city's districts "elongated", "sprawling", "odd", "illogical" and "bizarre".

"Both the City Charter and the City Code require that voting districts be drawn as compact and contiguous as possible," she wrote. "But, no matter how many ways one might try to describe the shape of Districts 7-10, and 14, the word compact would not apply, elongated, or sprawling, perhaps —but certainly not 'compact.'"

Avg compactness scores

Draw	Avg. Convex-Hull	Avg. Fractions-Kept	Avg. Length-Width	Avg. Polsby	Avg. Reock
Tributary	0.83	0.989	0.82	0.53	0.50
UNITY	0.81	0.987	0.82	0.47	0.36
Lime	0.80	0.986	0.77	0.44	0.36
Orange	0.78	0.987	0.80	0.43	0.36
Maroon	0.79	0.985	0.76	0.43	0.36
COUNCIL	0.74	0.981	0.72	0.37	0.29

Howard has not yet set a trial date to handle the full lawsuit, including claims that the City Council violated its charter requirement to draw compact districts.

Howard also **rejected the city's recent motion** to stay her decision. On Wednesday, the city filed **a new motion** asking the 11th U.S. Circuit Court of Appeals to halt her order. The appellate court said the plaintiffs must respond by Friday.

Up until now, City Council President Terrance Freeman has expressed complete confidence the council will approve a new map on Friday, but Wednesday — the same day the city asked an appellate court to stop the court order because the timeline was too onerous — Freeman suggested for the first time the committee may not complete the task.

So far, the redistricting committee has **narrowed its focus to two maps that are less compact but more favorable for Republicans than a proposal submitted by the plaintiffs**.

Howard had previously criticized an expert hired by the city whose work, she said, "ignores the requirements of the City Charter and the City Code that the districts be as compact and contiguous as possible."

That ignorance continued Wednesday. Teal and another city expert, Douglas Johnson, said they didn't need to worry about drawing compact districts. Neither brought up the fact the local charter requires compact districts or that Howard had repeatedly pointed to that requirement.

"What you can't do is have them be oddly shaped because you're grabbing a racial majority," Teal said. "You can't do it for racial reasons in order to pack a district with all these tendrils going out to grab people of the persuasion you're going after."

He continued, "So in and of itself, it's OK to have weird-shaped districts. Just because it looks a little weird doesn't mean it's improper or unconstitutional. We can say it looks weird because we're keeping a neighborhood together, or Republicans versus Democrats, or keeping an incumbent in their district. That's perfectly OK."

Teal said they didn't need to worry about how compact a district is.

Draw	Neighborhoods split	Neighborhoods split multiple times
Tributary	55	7
UNITY	56	8
Orange	59	13
Maroon	60	8
Lime	62	7
COUNCIL	71	11

In response to an outcry from residents, the redistricting committee did ask its expert to explore keeping Riverside, Avondale and Murray Hill in one district.

City Councilwoman Randy DeFoor had asked the city's mapdrawer if he had looked at Jacksonville's neighborhoods map but he and the city's planning director claimed none existed — something the city has also claimed in court filings.

DeFoor, who is a real-estate lawyer, said she knew that to be untrue, and after the Tributary provided her with a copy of a **neighborhood map** made by the city, DeFoor told the city's lawyers they had an obligation to correct the court record.

Teal also reiterated that the city would not attempt to draw districts that comply with the Voting Rights Act. He said Section 2 of the Voting Rights Act was “a tool that local governments can use to make the case for having a race-based or minority district. The problem with it in this particular case is that requires — you have to go through these math exercises if you will, in order to demonstrate there’s a need for separate race-based districts. We just don’t have the time to do that.”

Later, Councilman Rory Diamond, one of the committee’s vice chairs, said that because the city was sued for violating the 14th Amendment, not the Voting Rights Act, “our job is to write a constitutional map. That’s our sole job. And as far as I can tell, we are absolutely doing that.”

For nearly a year, the plaintiffs had offered to share the data and code their experts used to analyze the city’s racially polarized voting, but the city has rejected that offer.

What else do I need to know?

The Tributary has been covering local redistricting for more than a year. Here is a sample of our past coverage:

Jacksonville’s redistricting plan risks racial gerrymandering claims, experts say
Jacksonville redistricting plan splits dozens of neighborhoods
Jacksonville’s redistricting plans ignore federal guidelines
For decades, Jacksonville City Council redistricted based off ‘misinformation’
‘They’re not compact. They’re sprawling.’: Federal judge probes Jacksonville City Council redistricting
‘Racial segregation’: Federal judge blocks Jacksonville City Council districts as racial gerrymanders
INTERACTIVE: HOW JACKSONVILLE’S CITY COUNCIL DISTRICTS SORT RESIDENTS BY RACE
INTERACTIVE: HOW JACKSONVILLE’S MAP SPLITS NEIGHBORHOODS

The Tributary has been covering local redistricting for more than a year. Here is a sample of our past coverage:

In a footnote in Howard’s most recent order, she suggested that she would analyze the proposed maps’ compliance with the Voting Rights Act.

If she determines the city’s proposed plan violates the Voting Rights Act, she may require the city to draw certain districts that protect Black voters’ ability to elect their preferred candidates without packing in Black voters beyond what’s necessary.

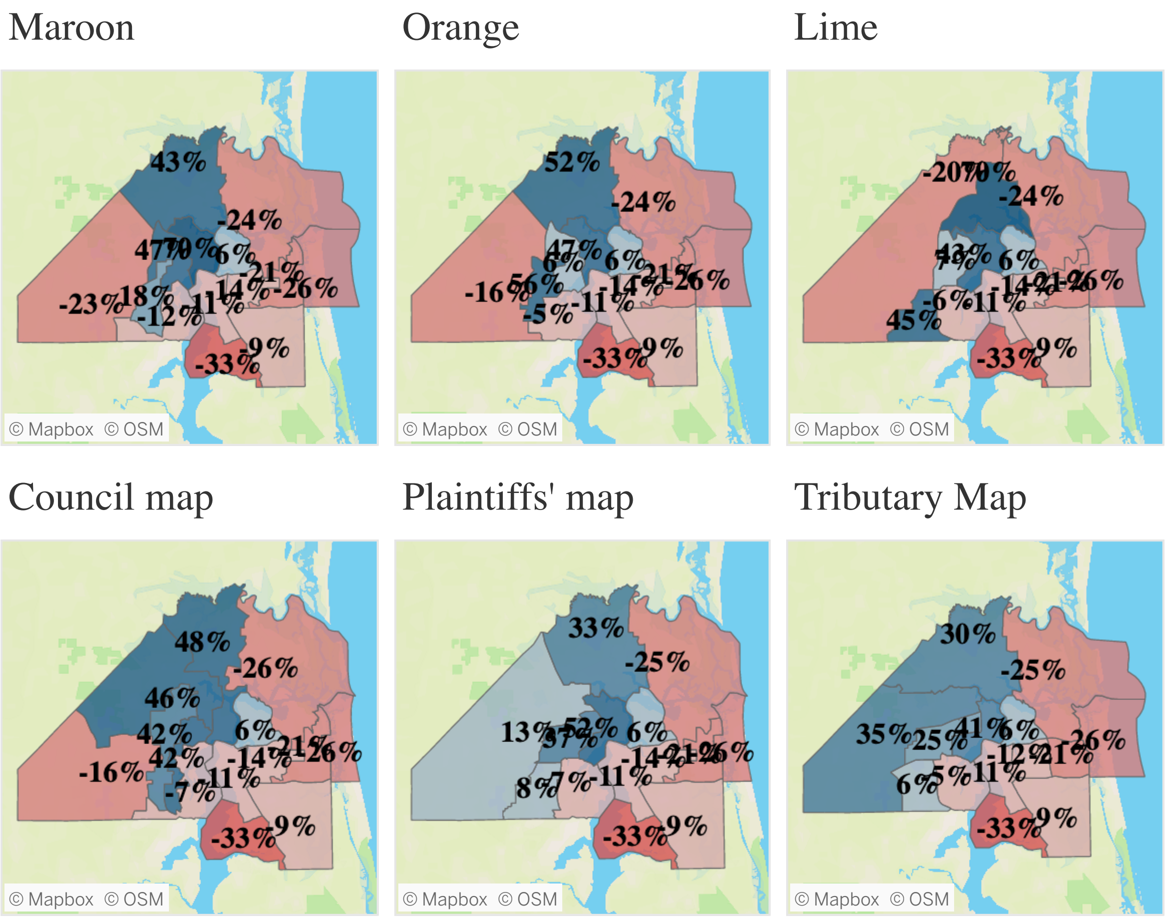
Although the city’s expert has looked at the racial demographics of his proposed maps, he didn’t share the specific data with the redistricting committee. Instead, even though the committee didn’t ask for political data, Johnson shared voter registration information.

While some citizens have submitted map proposal to the committee, the committee has not discussed or reviewed those either. Teal said he and the redistricting expert need to review proposed maps' "demographics", including the "political demographics". Teal never explained why a lawyer would need to review the political demographics of the districts before being able to share those districts with the committee.

Johnson said citizens need to send him shapefiles if they want the committee to review the proposals. But after he said that, he admitted one citizen did send a shapefile yet he still didn't share the map with the committee.

Average Democratic margin across 16 elections

(Using results from the 2022 sheriff's primary; 2020 presidential, congressional and clerk's race's; 2019 tax collector; 2018 races for tax collector, governor, attorney general, CFO, agriculture commissioner, U.S. Senate; 2015 races for City Council At Large Group 5 and mayor)



Some citizens, including former Republican City Councilman John Draper, accused the city of using party registration as a proxy for race. Draper, who was involved in **the 1991 redistricting that**

was central to the legal case, said the city racially gerrymandered back then and has continued to do so ever since.

“Thirty years ago, we put this basic plan together, and we called it minority access districts. Now that’s illegal. We have to call them Democrat-access districts if that’s what we really want. I’m sure some of you like that idea. But the problem with that is that you, by creating three Democrat-access districts, you greatly reduce the effective service of Democrats in the surrounding districts. So you dilute the the input of Democrats.”

He continued, “We don’t need that in Jacksonville. The issues are not partisan issues.”

Freeman has refused to answer questions about whether the committee intends to use partisanship in its redistricting, saying that is a legal question that needs to be answered by the city’s lawyers. The city’s top lawyer said the committee may consider partisanship, but the committee is not required to do so.

Freeman and the other council members have largely avoided talking about partisanship during the committee meetings. Instead, Freeman did discuss race, saying at one point it was “troubling to me” that under all four proposed plans there would be “three minority-access seats” compared to four in the current map.

That phrasing was misleading, and even the city’s expert said he would not weigh in on whether the proposed plans would have four “minority-access districts” since he said there was “a lot of debate” about what Black population percentage in Jacksonville was necessary for a minority-access district.

Under the plaintiffs’ proposed map, there would be four Black-majority districts, though one would fall just under 50% when using voting-age population instead of total population.

Under the committee’s preferred Maroon map, there are three Black-majority districts and a fourth that is 49% Black. The fourth district falls to 45% Black when using voting-age population.

However, the Black share of a district is not what’s most relevant to the Voting Rights Act. Courts have said the law can protect districts that allow Black voters the ability to elect their preferred candidates, even if that percentage is less than 50%.

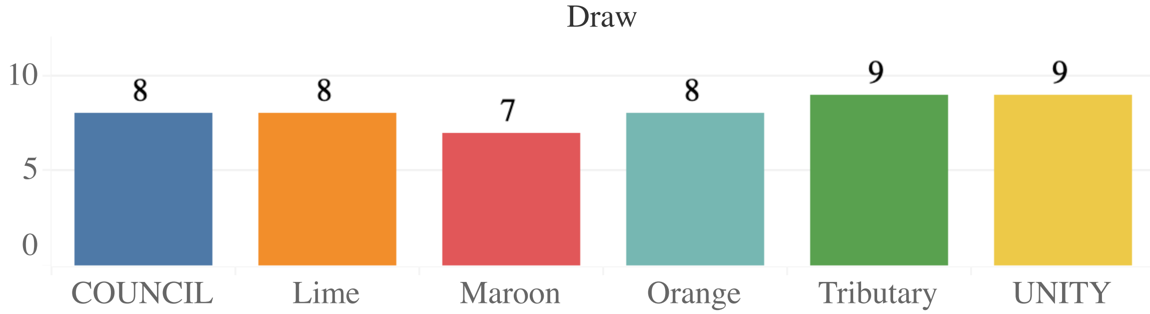
For example, over the last decade, courts ordered a Senate district in Jacksonville that was 41% Black voting-age population and a congressional district that was 44% Black voting-age population.

According to the plaintiffs, four districts in their map would regularly allow Black voters the ability to elect their preferred candidates, while increasing the likelihood Black voters could also elect their preferred candidates in a fifth more competitive district. The plaintiffs' analysis said that the candidate preferred by Black voters won 25 out of 25 elections in three districts, 24 out of 25 elections in one district and 19 out of 25 in another.

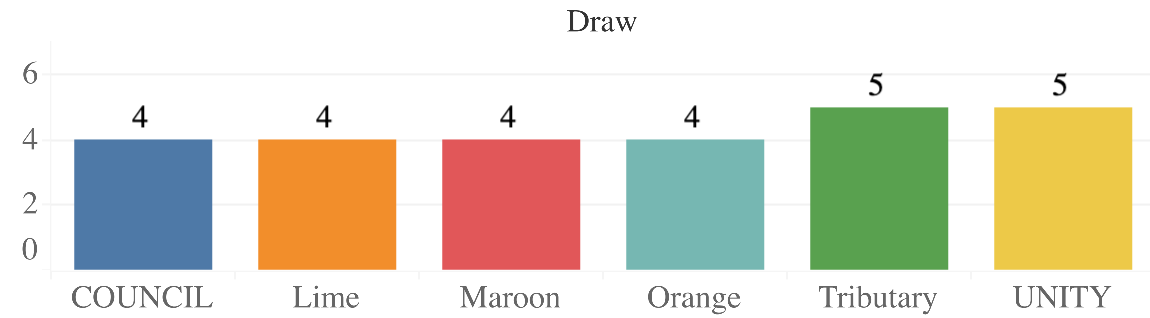
Councilwoman Ju'Coby Pittman told the Tributary the reduction in the Black population in one of the districts was a significant factor for her.

"Do the math," she said. "You can count from four to three districts. It's a real concern for me."

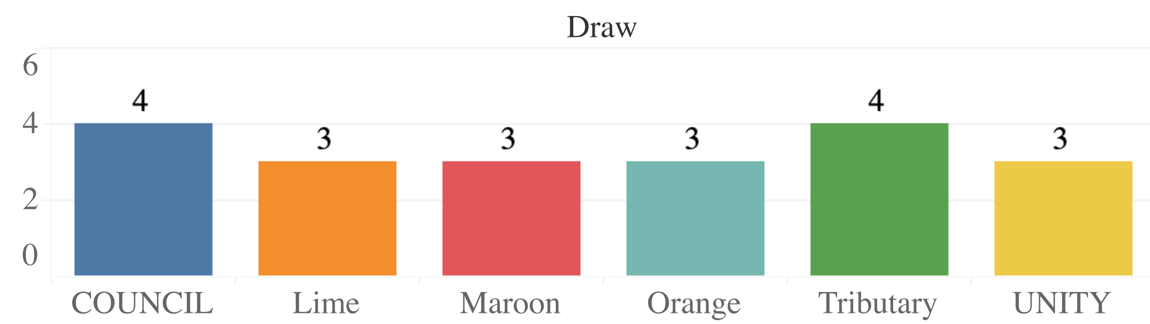
# of districts with at least one Democratic win



# of districts with at least 14 Democratic wins



# of districts with 16 Democratic wins



Earlier, Councilman Diamond, who is one of the vice chairs of the redistricting committee, similarly expressed concern to The Tributary that if the committee approved the plaintiffs' proposed map

"African-American Democratic representation on the council would go down and cause a new set of plaintiffs to file suit."

In contrast, he told the committee, "Even if we did the VRA analysis, I think the Maroon map would pass just fine. And so I feel very comfortable supporting it going forward."

The committee also asked Johnson, the mapdrawer, to look at making some changes to Districts 8 and 9. Johnson agreed to do that, though he explained that it was OK that District 9 looks odd and is "stretched out".

In an interview, Councilwoman Pittman said she wanted District 8 to look more like it did in the map that the federal court struck down, so she asked Johnson to push her district north of the Trout River. She said she'll need to review data in whatever version of District 8 Johnson draws before passing judgment.

She said the map passed 10 years ago, when **some on the City Council used racial quotas**, put the current council at "a disadvantage. We are here because we started out with something that shouldn't have been. At this point, we have an opportunity to get it right."

Councilwoman Ju'Coby Pittman. [The Tributary]

How to draw your own districts

Anyone who wants to try their hand at drawing their own districts and submitting them to City Council can follow these instructions:

Sign up for an account at Dave's Redistricting App.

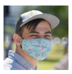
Click on this link. Click the paintbrush next to the "View Only" text. Click "Yes" to make an editable copy of the map.

Click on the new map and click edit. You can then begin drawing a map that will keep the seven districts south and east of the St. Johns River frozen.

Once you've finished, click the export button near the top-right of your screen and select "District Shapes (as Shapefile, .zip)". Send the zipped folder to the redistricting committee at **2022redistricting@coj.net**. You can also send us a copy at **maps@jaxtrib.org** so we can feature your submitted maps in a future newsletter.

CHANGING FLORIDA

Jacksonville City Council passes new district map after racial gerrymandering ruling



by **Andrew Pantazi**
November 4, 2022 Updated November 7, 2022

Jacksonville City Council approved new maps on Friday. [The Tributary]

The Jacksonville City Council passed a new district map Friday after a contentious week that at one point saw the same map first fail when it came up for a vote.

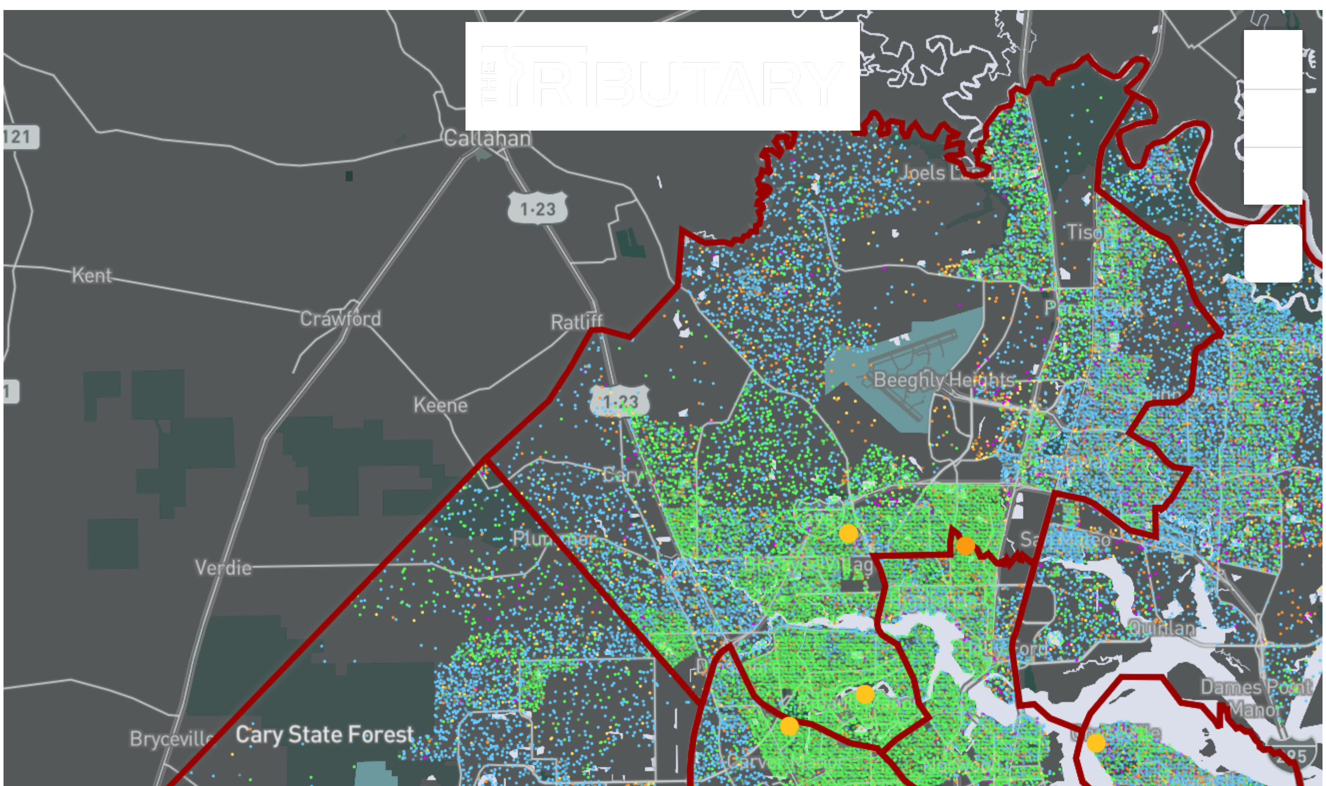
The new map, which will affect City Council districts and Duval School Board districts, will go to U.S. District Court Judge Marcia Morales Howard to review. The plaintiffs have until Nov. 18 to object to the map and propose their own for review.

The new districts are still not compact, and they split many neighborhoods, but General Counsel Jason Teal and the city's mapdrawer, Douglas Johnson, **repeatedly told the council they didn't need to worry about drawing compact districts**. Teal said it was OK that districts were "funny looking," as long as it was to protect an incumbent or for some other ostensibly race-neutral reason.

In addition to Judge Howard's injunction striking down the previous districts for racial gerrymandering, the plaintiffs may take the city to trial over claims the districts violate a city charter requirement for "logical and compact" districts.

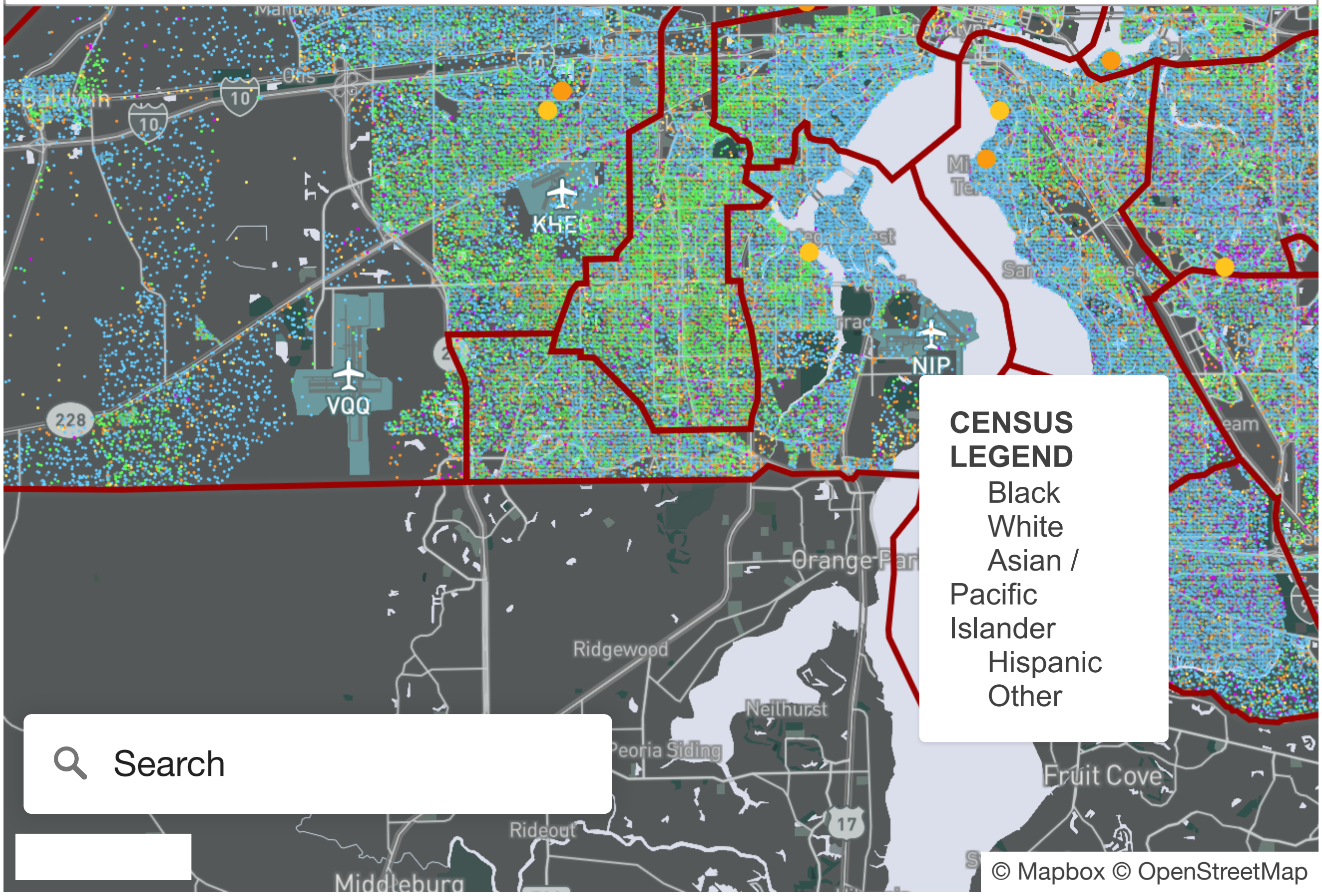
The old map saw 54% of the county's Black residents in just four out of 14 districts. Under the new map, 51% of Black residents are in those districts.

The City Council didn't begin weighing in on maps until Tuesday, three weeks after Howard struck down the city's earlier map as a racial gerrymander.



NEW MAP

OLD MAP



At times this week, the city's expert appeared to use "urban" to refer to Black suburbs and "rural" to describe white suburbs to explain why those neighborhoods didn't belong together.

At one point, he described one proposed white-majority district as "rural" even though it was the second-densest district they had redrawn. Meanwhile, he described Sherwood Forest, a Black-majority neighborhood on the outskirts of town, as "urban" and not a good fit to be matched with "rural" communities like Baldwin.

Yet the approved District 12 combines Baldwin with white-majority neighborhoods with similar population densities to Sherwood Forest.

One public commenter argued Johnson's use of "urban" and "rural" wasn't fair. Sherwood Forest, like the white neighborhoods it was joined with on the Westside in the plaintiff's proposed plan, was suburban, the commenter argued.

On Tuesday, Wednesday and Thursday, a redistricting committee advanced a map proposal that had earned objections from councilmembers not on the committee. The first proposal brought up for a vote Friday couldn't even earn a majority of the City Council members' support for consideration, let alone the 13 votes needed to pass it.

A later proposal came just shy of 13 votes, with 12 voting for it and four voting against it. Councilwoman Randy DeFoor wanted to see Riverside, Avondale and Ortega kept together in one district, but after working with the city's mapdrawer and talking to Property Appraiser Jerry Holland, she agreed to reconsider the legislation. The final vote was 16 to 1.

When asked if she thinks the court will approve the city's map, she said, "boy, I hope not. If I can get Riverside and Avondale back in my district [from an alternative map], I'd prefer that."

Council President Terrance Freeman praised the work of the council to meet the court's deadline, saying, "We finally made it to a place where we unanimously voted — all but one — to give the judge a constitutional and legal map."

Meanwhile, the city is still fighting to restore the earlier districts that Howard struck down, asking the 11th U.S. Circuit Court of Appeals to stop Howard's order. **The city has asked the appellate court** to block the order by next Tuesday.

Brenda Priestly Jackson, who voted against the map in the final vote, had criticized the council, saying the city's map didn't respond to what plaintiffs said in their complaint or what the court wanted in its order.

The court found that packing Black voters into four districts had reduced their influence in the city as a whole, ensuring three surrounding districts were much whiter than they would be otherwise.

"I think we did a disservice," Priestly Jackson said, by not listening to the community's concerns.

Teal said that candidates wouldn't need to worry about the city's requirement that candidates live in their district for about six months before an election, saying the court could waive that requirement. Later, he told The Tributary that as the general counsel he has the authority to issue his own binding opinion waiving the residency requirement if Howard doesn't.

Councilman Reggie Gaffney said Teal's assurance was a major factor in why he voted for the map. His son is on the ballot next Tuesday in a special election to replace him, but **Reggie Gaffney Jr. will need to move out of his dad's house** to stay in the district for the March and May elections.

Until Teal's assurance, Gaffney had worried about making sure his son, who lives with him north of the Trout River, would get a district that stretches into downtown. Now his son can move there before the March election without having to worry about a deadline that would've required he had lived there since July.

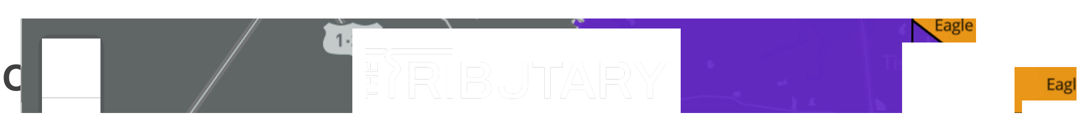
Councilwoman Ju'Coby Pittman, whose previous comments about not being willing to have her old district go below 68% Black were critical in the injunction, said this time around she wanted a district that more closely resembled the one that was struck down by the federal court. She ended up with one that combined parts of her old district with parts of the old District 7, going from the area around the Ribault River north past the Trout River. It's now 65% Black.

Councilman Al Ferraro also managed to keep San Mateo in his district, something that dominated some of the conversations this week. Each of the four initial proposals had put San Mateo into a different district.

Judge Howard's order also honed in on an earlier discussion about San Mateo last year. At that time, Ferraro and Gaffney went block by block along their border and discussed racial demographics as they decided which blocks should transfer from Ferraro to Gaffney. San Mateo, which has a larger white population, stayed with Ferraro.

This time around, neighbors discussed their concerns as a community, and they decried what they saw as political corruption intended to push Mike Gay, a San Mateo resident, out of the district so that he couldn't run for election next spring.

NEIGHBORHO



By ANDREW PANT…

Nov. 4, 2022

Jacksonville City Cou…
communities and ma…

Zoom in to see neigh…
its Municipal Code C…

Note: Neighborhood…
Blame them, not us, …

READ MORE

2020 Federal Census …

Gilmore

Tallyrand

Arlington Hills

Fara Ways

Forrest

Arlington Manor

Girvin

Longbranch

Regency

Holly Oaks

East Arlington

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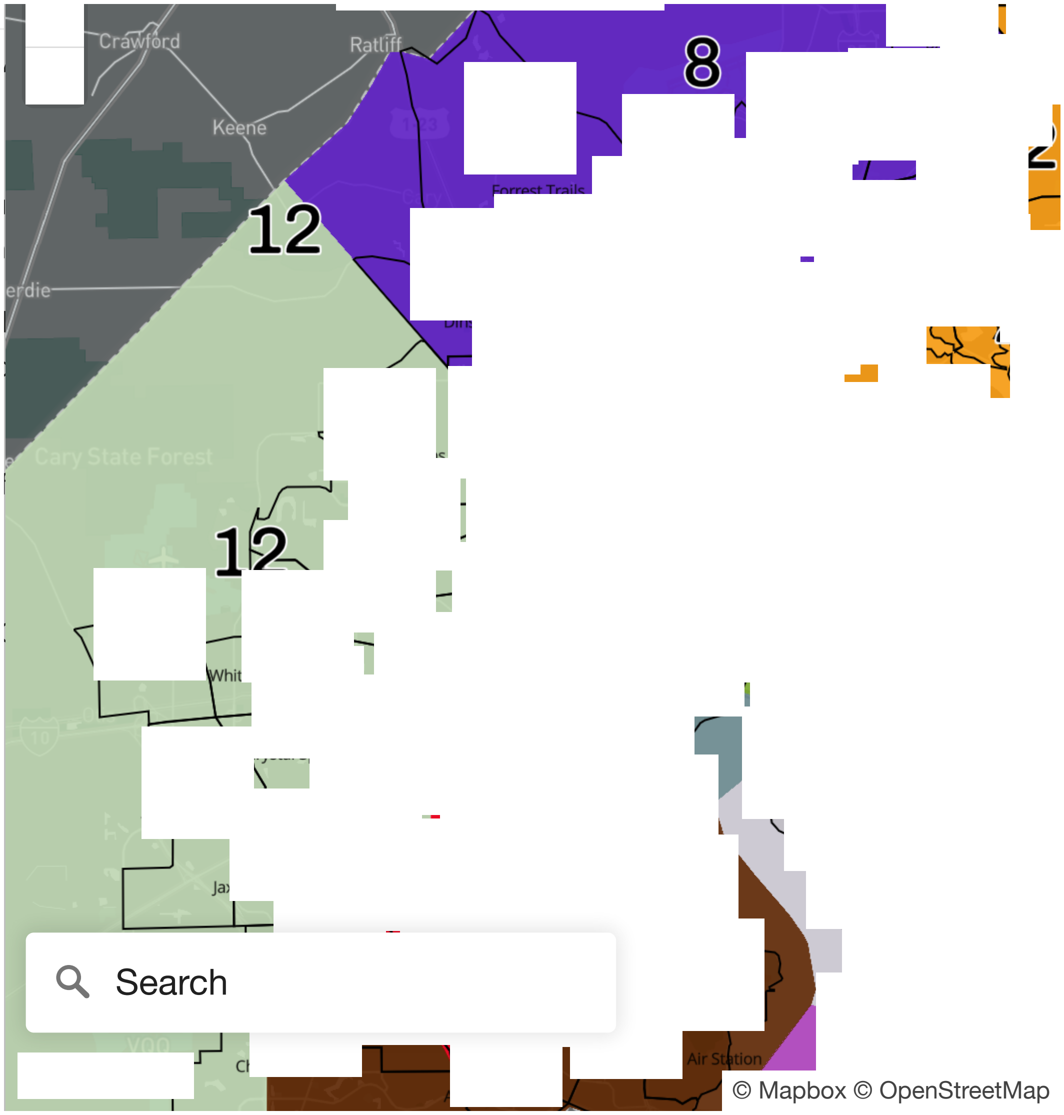

Johnson also said he used the city's planning districts to guide boundaries, but in fact, several districts unnecessarily split those, too.

While lawyers had told the council they could consider partisan makeup in their decision-making, the council members rarely openly did so.

City Council members said that race was not a factor this time, even as some conversations centered around race, discussing how many districts would still have a Black-majority population or whether the districts had sufficient demographics to comply with the Voting Rights Act if challenged.

The city never produced an analysis that explained how they determined the districts would comply with the Voting Rights Act. Howard's order required

Instead, the council members said they had prioritized protecting both incumbents and candidates, like Gaffney's son.

They also prioritized keeping districts similar to the ones struck down. Gaffney wanted his district to continue to represent downtown. Pittman wanted her district to continue to stretch north of the Trout River. Councilman Randy White objected to moving his district between I-295 and the First Coast Expressway.

The city has until Nov. 8 to file the new maps with the court, and then the city will have three days to give the court its data, analyses, transcripts and other documents connected with the redistricting.

The plaintiffs then have until Nov. 18 to object to the map and submit alternative plans. The city will have 10 days after that to reply. The Duval Supervisor of Elections office has said it needs a final map by Dec. 16.

News4JAX

Property appraiser says redrawing Riverside-Avondale district was a necessity due to growth

Map is awaiting judge's final approval

Tarik Minor, Anchor, I-TEAM reporter
Published: November 7, 2022 at 4:11 PM
Updated: November 7, 2022 at 5:47 PM

JACKSONVILLE, Fla. – After much deliberation and debating, Jacksonville City Council members made a final decision Friday on a redrawn redistricting map.

The Jacksonville City Council had to design a new map after local groups sued alleging the new district lines were considered based on race.

News4JAX spoke to a property appraiser about the newly drawn redistricting map, which is now being reviewed by a U.S. district judge.

District 14 Councilwoman Randy DeFoor was nearly in tears because of the decision. At the last minute, DeFoor changed her vote, and the council passed the map, which splits Riverside and Avondale into separate districts.

"Having them separated just doesn't feel right. I just worry about whether or not they get the representation they deserve," DeFoor said.

DeFoor said one of the main reasons she voted "yes" on the redrawn map was because of the insight she received from the Duval County property appraiser.

Jerry Holland said District 14, which traditionally included Riverside, Avondale and Ortega neighborhoods, has grown at such a fast pace, there was no choice but to rework its boundaries.

"It became so populated, we have to give a lot of it to District 10, and when you give that population, that District 10, had to turn that turnaround and give it someone and then try to pick up," Holland said. "So, it was a balancing of District 14, District 10 and District 12. The numbers wouldn't work where it would balance."

Holland said while the population in District 14 has grown, some of the surrounding districts have decreased in population. The newly approved redistricting map awaits the final ruling by U.S. District Judge Marcia Howard, and many residents are waiting for that decision.

“I do think the judge should come back with a decision pretty soon. It may be as late as Nov. 18, but the judge knows that the supervisor of elections needs this information. The supervisor of elections has to send out voter registration cards and plan the precincts, so the judge can’t wait,” Holland said. “I think this map meets all the areas that the judge thought was egregious.”

ABOUT THE AUTHOR:

Tarik Minor

Tarik anchors the 4, 5:30 and 6:30 p.m. weekday newscasts and reports with the I-TEAM.