

IN THE UNITED STATES DISTRICT  
COURT FOR THE SOUTHERN  
DISTRICT OF TEXAS GALVESTON  
DIVISION

TERRY PETTEWAY et al.,

Plaintiffs,

v.

GALVESTON, TEXAS et al.,

Defendants.

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Civil Action No. 3:22-CV-00057

**DEFENDANTS' RESPONSE IN OPPOSITION TO THE**  
**UNITED STATES' MOTION TO COMPEL**

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COMES NOW, Defendants Galveston, Texas and the Honorable Mark Henry, et al. (collectively “Defendants”), and files this Response in Opposition to the United States’ (“DOJ Plaintiff”) Motion to Compel (ECF No. 103).

### **NATURE AND STAGE OF PROCEEDING**

Plaintiffs assert constitutional and Voting Rights Act claims against Defendants in connection with a commissioners’ precinct map adopted after the 2020 census, alleging the map discriminates against Black and Latino voters in Galveston County. Defendants’ Motion to Dismiss is pending (ECF 46), discovery is ongoing, and trial is set for this summer. ECF 65.

#### **A. Summary and Introduction**

Defendants are now responding to Plaintiffs’ second motion to compel, despite the Court’s order stating all Plaintiffs should file a single motion to compel. *See Minute Entry*, (S.D. Tex. Jan. 30, 2023) (“Plaintiffs to file *a* motion to compel by February 9, 2023; Defendant to file *a* response by February 16, 2023; and Plaintiffs to file *a* reply by February 21, 2023.” (emphasis added)).<sup>1</sup>

DOJ Plaintiff’s motion to compel focuses predominantly on two arguments: (1) Dale Oldham was an attorney in name only, and functioning more as a political consultant to Defendants; and (2) Defendants’ privilege log is conclusory and insufficient. Both

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<sup>1</sup> Notably, only one joint discovery letter was submitted to the Court in this matter, containing a single position on behalf of all Plaintiffs in this action. *See* ECF 97 (Jan. 25, 2023). No separate position was included by DOJ Plaintiff. Defendants were thus surprised to see the United States file a separate Motion to Compel in response to the Court’s order. Nevertheless, given the overlapping arguments made by DOJ Plaintiff and Private Plaintiffs, at the appropriate points Defendants will incorporate by reference the points made in opposition to Private Plaintiffs’ motion to Compel, and vice versa for DOJ Plaintiff’s motion.

positions are without merit.

First, both Holtzman Vogel attorneys and Mr. Oldham were retained by Defendants to provide legal advice throughout the redistricting process. The redistricting process is a constitutionally required legislative activity that the U.S. Supreme Court has described as a “legal obstacle course.” *Abbott v. Perez*, 138 S. Ct. 2305, 2315 (2018). Accordingly, Galveston County retained legal counsel to ensure compliance with the law’s requirements, including the Voting Rights Act and the Constitution. Therefore, their communications with clients and amongst themselves seeking and providing legal advice are protected by the attorney-client privilege. Furthermore, and contrary to DOJ Plaintiff’s assertions, the Galveston County Commissioners are protected by the attorney-client privilege regardless of their status as government actors. If adopted as law, DOJ Plaintiff’s position threatens to swallow the attorney-client privilege rule entirely for government actors.

Second, Plaintiff’s argument that Defendants’ privilege log insufficiently describes the documents or privilege claims is without merit. Defendants have gone above and beyond here, providing who the communication is between, when the communication took place, what type of communication it was, and a detailed description of the communication.

For these reasons, the Court should deny DOJ Plaintiff’s Motion to Compel.

## **B. Background Facts**

For the relevant factual and procedural background in support of this Opposition, Defendants incorporate by reference the “Background” section of their Opposition to Plaintiffs’ Motion to Compel. *See* Defs.’ Opp. to Pls.’ Mot. to Compel at 4-7.

## ISSUES TO BE RULED UPON (RESTATED) & STANDARD OF REVIEW

Whether the Court should deny Plaintiffs' request to compel production of documents identified in Exhibit 16 (ECF 102-17).

The Court has discretion in determining these issues, subject to a "clearly erroneous" standard of review by the district court. *See Castillo v. Frank*, 70 F.3d 382, 385 (5th Cir. 1995) (citing 28 U.S.C. § 636(b)(1)(A) and Fed. R. Civ. P. 72(a)).

## ARGUMENT

### **I. The Galveston County Commissioners Court is Entitled to Legal Counsel and the Privileges that Attach to Communications with Counsel and Documents Prepared In Anticipation of Litigation.**

#### **A. Attorney-client privilege protects Galveston County's communications seeking or providing legal advice assisting the Commissioners Court in preparing a legally compliant redistricting plan.<sup>2</sup>**

The attorney-client privilege "is the oldest of the privileges for confidential communications known to the common law." *Upjohn Co. v. United States*, 449 U.S. 383, 389, 101 S. Ct. 677 (1981) (citing 8 J. Wigmore, *Evidence* § 2290 (J. McNaughton rev. 1961)). Its aim is "to encourage full and frank communication between attorneys and their clients and thereby promote broader public interests in the observance of law and administration of justice." *Id.* at 389; *Hunt v. Blackburn*, 128 U.S. 464, 470 (1888).

As the Supreme Court has affirmed, "[t]he objectives of the attorney-client privilege apply to governmental clients. The privilege aids government entities and

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<sup>2</sup> For further argument on this point, Defendants incorporate by reference Section I.A. of their Opposition to Plaintiffs' Motion to Compel. *See* Defs' Opp. To Pls.' Mot to Compel at I.A.

employees in obtaining legal advice founded on a complete and accurate factual picture.” *United States v. Jicarilla Apache Nation*, 564 U.S. 162, 169-170 (2011) (quoting 1 Restatement (Third) of the Law Governing Lawyers § 74, Comment b, pp. 573-574 (1998)). “[G]overnmental agencies and employees enjoy the same privilege as nongovernmental counterparts.” *Id.* Accordingly, “[u]nless applicable law provides otherwise, the Government may invoke the attorney-client privilege in civil litigation to protect confidential communications between Government officials and Government attorneys.” *Id.*

It is common practice for legislators to communicate with legal counsel about drafting legislation. Typically, this process involves legislative counsel preparing initial drafts of bills and sending them to the legislator for their review; legislators then return the drafts with proposed revisions and often include questions to counsel seeking legal advice regarding the revisions. Many of these communications that take place prior to the introduction of the bill on the floor of the legislature and final enactment of the bill into law are private (non-public) communications that fall within the scope of the attorney-client privilege.

Based on these well-established principles of law, Defendants are entitled to legal counsel (and the associated privilege protections) during the legislative process to draft and analyze legislation, and to provide legal analysis of proposed legislation. *LULAC v. Abbott*, 342 F.R.D. 227, 236 (W.D. Tex. 2022) (“*LULAC IV*”); *Bethune-Hill v. Va. State Bd. Of Elections*, 114 F. Supp.3d 323, 346 (E.D. Va. 2015); *see also* Tex. Gov’t Code § 323.017.

DOJ Plaintiff argues this privilege could not be invoked by Mr. Oldham because he was retained to “*draft* maps,” ECF No. 103 at 18, and that because this constituted “legislative and political activity” by “an individual who happens to be a lawyer,” Mr. Oldham’s services were not for the “primary purpose of legal advice.” *See id.* at 14-17. DOJ Plaintiff is wrong on both the law and the facts.

First, DOJ Plaintiff incorrectly assesses the work Mr. Oldham does and was hired to do for Defendants. The U.S. Supreme Court has described the process of redistricting as a “legal obstacle course” requiring legislators to avoid competing hazards of liability: the Fourteenth Amendment’s prohibition against racial gerrymandering and Section 2 of the Voting Rights Act’s requirement that legislators consider race. *See Abbott*, 138 S. Ct. at 2315. Galveston County, rightfully, retained counsel “to provide legal representation and advice regarding redistricting in Galveston County, Texas, including provision of a technical expert to draw the map.” ECF No. 97-8 at 2.

The representation agreement between redistricting counsel and Defendants for the 2021 cycle made clear that Holtzman Vogel would be “associated with Dale Oldham, P.C. in representation on this matter.” *Id.* Holtzman Vogel attorney Phillip Gordon was “primarily responsible” for overseeing the representation, and he would be assisted by Dale Oldham and Jason Torchinsky in providing legal advice to Galveston County as redistricting counsel. *Id.*; *see also* ECF Nos. 97-9 at 6-8 (103:10-128:17), 97-10 at 16 (221:12-21); 97-10 at 22 (261:7-16) (Commissioner Apffel and Judge Henry repeatedly testifying that Mr. Oldham worked as redistricting counsel advising Galveston County to ensure the maps were legally compliant). Mr. Bryan was brought in as the “technical

expert” to draw the map; Mr. Oldham did not draw the maps. *See Oldham Aff.*, Ex. 1 ¶¶ 9-10. Accordingly, it was clear from the outset that Mr. Oldham functioned as redistricting counsel for Galveston County.

Contrary to Plaintiffs’ argument, ECF 103 at 11, 13, 16, Defendants have shown that confidential communications between Mr. Oldham and the Commissioners during the redistricting process that have been withheld under the attorney-client privilege were for the *primary purpose* of securing a legal opinion, legal advice, legal services, or assistance during legal proceedings and are all protected attorney-client communications. *See Oldham Aff.*, Ex. 1 ¶¶ 5-8, 10, 13-15, 17-18; *see also EEOC v. BDO USA, LLP*, 876 F.3d 690, 695 (5th Cir. 2017). The fact that these legal opinions were rendered regarding legislation or drafts of proposed legislation (*i.e.*, draft maps for the 2021 redistricting plan) does not remove the protection they receive from taking place within the attorney-client relationship for the purpose of legal advice. *LULAC IV*, 342 F.R.D. at 236 (noting that “the United States went too far by directly asking about the advice that Butler Snow gave Chairman Hunter regarding proposed House Bill 1.”); *S.C. State Conf. of the NAACP v. Alexander*, 2022 U.S. Dist. LEXIS 120295 at \*19, (D.S.C., Apr. 27, 2022). Any communications with Mr. Oldham seeking or obtaining legal advice regarding the redistricting process to ensure compliance with applicable laws are quintessentially privileged communications that can be withheld under the attorney-client privilege.

Additionally, although the attorney-client privilege only protects legal advice and not political, strategic, or policy advice, DOJ Plaintiff reads that “political, strategic, or

policy advice” language too broadly, in a way that eviscerates privilege. *See* ECF 103 at 12-16. Communications that contain factual information are still privileged when the communications are tethered to the legal advice. *Exxon Mobil Corp. v. Hill*, 751 F.3d 379, 381-82 (5th Cir. 2014). Thus, for example, a criterion adhering to the one-person, one-vote constitutional principle can create legal liability under the Fourteenth Amendment’s prohibition against racial gerrymandering. *See Ala. Legis. Black Caucus v. Alabama*, 575 U.S. 254, 271-72 (2015) (rejecting argument that the legislature’s goal of achieving population equality among districts defeated a claim that race predominated in the drawing of districts). A criterion achieving compactness is also capable of triggering legal liability under both Section 2 of the Voting Rights Act and the Fourteenth Amendment’s prohibition against racial gerrymandering. *See Thornburg v. Gingles*, 478 U.S. 30, 50-51 (1986); *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 433-35 (2006). Even conversations regarding drawing districts for partisan advantage can trigger legal liability under the Fourteenth Amendment’s one-person, one-vote principle when population deviations are systematically skewed to favor one political party. *Larios v. Cox*, 300 F. Supp. 2d 1320, 1329 (N.D. Ga. 2004) (three-judge court) *aff’d. mem.* 542 U.S. 947 (2004). Lastly, conversations about whether the Commissioners reviewed racial demographic data could trigger liability under both the Voting Rights Act and the Fourteenth Amendment. *Abbott*, 138 S. Ct. at 2315.

Defendants’ communications that are withheld based on attorney-client privilege were drafted for the primary purpose of providing legal advice and were not divorced from the legal implications; on the contrary, they were inextricably intertwined with

those implications. Therefore, the Court should dismiss DOJ Plaintiff's claims to the contrary.

**B. Galveston County's Privilege Log Provides Sufficient Information To Justify The Privilege Assertion.**

The Federal Rules of Civil Procedure require that when a document is withheld as privileged, the party asserting the privilege must "describe the nature of the document[] . . . not produced or disclosed and do so in a manner that, without revealing information itself privileged or protected will enable other parties to assess the claim." Fed. R. Civ. P. 26(a)(5).

Given the lack of specificity regarding what is required, "there is understandably tension between what a requesting party and a producing party might consider the minimum standards for disclosure." *Carhartt, Inc. v. Innovative Textiles, Inc.*, 333 F.R.D. 118, 119 (E.D. Mich. 2019). Where a party provides generic descriptions only, such as "a notation that a document is correspondence, or meeting notes, or a report containing legal information," this is insufficient. *Id.* at 120 (internal quotation marks omitted). Even where document dates are provided, descriptions such as "email correspondence with [identified individuals] and the asserted privilege" are similarly deficient. *Id.* By contrast, a privilege log containing the date and identifying who is involved in the communication, the privilege assertion, and a description such as "[d]ocument providing, containing, reflecting, or discussing confidential legal advice from counsel concerning anticipated litigation[]" is sufficient *Id.* at 121. To determine the sufficiency of a privilege log, courts review the entries in their entirety, including

whether an entry identifies the individual involved in the communication, the date of the communication, the subject matter of the communication, and an adequate description of the document. *See id.*

Defendants' privilege log goes above and beyond what Rule 26 requires. The descriptions explain who the parties were to the communication, when the communication took place, the subject matter of the communication, what the documents were, and a detailed description of the nature and purpose of the communication. The descriptions speak for themselves. *See, e.g.*, ECF No. 102-5 at 2 (Doc ID 3 entry describes an October 3, 2011 “[c]ommunication from Galveston County Legal Liaison to redistricting counsel responding to redistricting counsel’s questions and advice re: DOJ preclearance”); *id.* at 8 (Doc ID 86 entry describes an October 26, 2021 “[c]ommunication from redistricting counsel to map-drawer, copying other redistricting counsel re: revisions to draft Map 1 precinct inventory to assist in providing legal advice and forming opinions”); *id.* at 19 (Doc ID 201 entry describes November 7, 2021 “[c]ommunication from Galveston County General Counsel advising redistricting counsel, Mr. Oldham, Mr. Torchinsky, and Mr. Gordon re: what is legally required for the Commissioners Court to consider and vote on Map 1 and Map 2”). Because Defendants provided all the parties to the communications, the dates, the document names, and the purpose of the communications, Plaintiffs are wrong in contending that 165 of these entries are insufficient.

In spite of this, DOJ Plaintiff dismisses the log descriptions as “conclusory.” ECF 103 at 13. The case law cited by DOJ Plaintiff for this argument is readily

distinguishable. First, DOJ Plaintiff relies on *EEOC v. BDO USA, L.L.P.*, which states: “courts have stated that simply describing a lawyer’s advice as ‘legal’ *without more* is conclusory and insufficient to carry-out the proponent’s burden of establishing the attorney client privilege.” 876 F.3d at 697. But in *BDO*, the court was responding to a magistrate judge’s incorrect presumption that because an attorney was on an email, the document in question was presumed privileged, and that the party moving to compel production had to overcome. *See id.* Nowhere did the Fifth Circuit determine that the term “legal advice” on a privilege log was *per se* conclusory and insufficient. To the contrary, such a description is often sufficient. *Cf. Carhartt*, 333 F.R.D. at 119 (noting that a privilege log description like “[d]ocument providing, containing, reflecting, or discussing confidential *legal advice* from counsel concerning anticipated litigation[.]” can be sufficient) (emphasis added).

Unlike the magistrate judge in *BDO*, here Defendants never argue that documents are privileged based solely on the fact that an attorney was on an email. *Cf. BDO*, 876 F.3d at 697. Defendants have produced a detailed and thorough privilege log, detailing for each document names of individuals involved in the communication, when communications were made, what kind of document was involved (whether it was a email, document attachment, shapefile, etc.), and provided a detailed description of the communication. *See* ECF 102-5.

Additionally, DOJ Plaintiff cites *Doe 1 v. Baylor University*, but that case is also distinguishable. *Doe 1* involved an affidavit—not a privilege log—that did not assert privilege over any particular document but about a general group of documents. The

affidavits made conclusory assertions of privilege, *e.g.*, “Baylor’s communications with Pepper Hamilton in connection with these Other Legal Matters were made for the purpose of facilitating the rendition of professional legal services for Baylor.” 2019 U.S. Dist. LEXIS 99362 at \*25-26 (W.D. Tex. June 7, 2019). That is inadequate; by contrast, going document by document and providing detailed information about who was involved in the communication, when the communication was made, what kind of communication, and why the communications was made is sufficient. *See Carhartt*, 333 F.R.D. 118 at 121; *see also* ECF 102.

Additionally, DOJ Plaintiff cites *United States v. Chen*, which states: “[c]alling the lawyer’s advice “legal” or “business” advice does not help in reaching a conclusion; it *is* the conclusion.” 99 F.3d 1495, 1502 (9th Cir. 1996). But this quote is plucked from its context and DOJ Plaintiff tries to shoehorn it into this case. The Ninth Circuit was not discussing privilege log descriptions. Instead, the issue was whether “the lawyer was employed with or without reference to his knowledge and discretion in the law, to give the advice.” *Id.* And in *Chen*, the court ruled that the attorneys were “employed for their legal knowledge to bring their clients into compliance with the law in the least burdensome way possible . . . their communications with their client were therefore within the scope of the attorney-client privilege.” *Id.*

DOJ Plaintiff also relies on *In re Boeing* for the proposition that stating that a document was privileged because counsel was “in fact provid[ing] legal advice on the content of those communications” was not privileged. ECF 103 at 13-14 (citing *In re Boeing*, 2021 U.S. App. LEXIS 22602 at \*5 (5th Cir. July 29, 2021) (unpublished)). As

an initial matter, DOJ Plaintiff neglected to disclose that *In re Boeing* was not published, and the Fifth Circuit expressly stated that this opinion “is not precedent.” *See id.* at \*1. Separately, unlike the circumstances here, in *In re Boeing* the privilege log’s detail was sparse, describing only that the lawyer provided legal advice on draft public communications regarding an accident involving a 737 Max 8 aircraft. *See id.* at \*4-5. By contrast, here Defendants have provided far more than that kind of brief assertion that a particular document contained legal advice. As discussed *supra*, Defendants’ descriptions detail who the parties were to the communication, when the communication took place, what the subject matter of the communication were, what the documents were, and a description of the nature and purpose of the communication.

For example, Doc ID 74 from Defendants’ privilege log describes: 1) the communication was sent from Thomas Bryan to Jason Torchinsky and Phil Gordon; 2) the communication was made on 10/15/2021 at 1:24 PM; 3) this communication was an email; and 4) the communication was “from map-drawer to redistricting counsel re: preparation of first draft map for legal review and posing questions re: redistricting constitutional requirements and traditional redistricting criteria.” *See* ECF No. 102-5 at 15. Plaintiffs argue *more* is required. *See* ECF 103 at 12-15. Defendants effectively could provide nothing more than the content of the communication itself, which would break the attorney-client privilege the Defendants have rightfully asserted. The Court should reject DOJ Plaintiff’s argument that these descriptions are insufficient.

**C. The Underlying Facts Exception To The Attorney-Client Privilege Does Not Apply To Those Documents Created Within The Attorney-Client Relationship.**

As noted, the attorney-client privilege “is the oldest of privileges for confidential communications known to the common law. *Upjohn Co. v. United States*, 449 U.S. 383, 389 (1981). The purpose of this privilege “is to encourage clients to make full disclosure to their attorney.” *Fisher v. United States*, 425 U.S. 391, 403 (1976); *see also Upjohn*, 449 U.S. at 389 (“Its purpose is to encourage full and frank communication between attorneys and their clients.”). Thus, if a client knows “that damaging information could more readily be obtained from the attorney...the client would be reluctant to confide in his lawyer and it would be difficult to obtain fully informed legal advice.” *Id.* The privilege thus “recognizes that sound legal advice or advocacy . . . depends upon the lawyer’s being fully informed by the client.” *Upjohn*, 449 U.S. at 389.

Further, because the Supreme Court describes the process of redistricting as a “legal obstacle course,” *Abbott*, 138 S. Ct. at 2315, the attorney client privilege is essential for the Commissioners to candidly communicate with Mr. Oldham and Holtzman Vogel lawyers to successfully navigate the complex legal thicket of redistricting law. *See Chen*, 99 F.3d at 1499 (citing *United States v. Zolin*, 491 U.S. 554, 562 (1989)).

Defendants agree with DOJ Plaintiff that the attorney-client privilege generally does not protect the underlying facts within the personal knowledge of a client, ECF 103 at 19; *Upjohn*, 449 U.S. at 395. However, it does protect the communication of facts to counsel. *Id.* Thus, those documents outside the scope of the attorney-client relationship are not privileged, even if those documents are sent to an attorney for legal review. *See United States v. Davis*, 636 F.2d 1028, 1040 (5th Cir. 1981); *see also id.* at 1041 (“[D]ocuments

created outside the attorney-client relationship should not be held privileged in the hands of the attorney unless otherwise privileged in the hands of the client . . .”). By contrast, however, those documents created as communications from client to counsel are protected under the attorney-client privilege. *Id.* at 1041. This is so because “to permit individuals to obtain fully informed legal advice, it is necessary to permit them to transfer relevant documents to their attorneys without losing any evidentiary privileges the documents might possess in their own hands.” *Id.* In summary, documents created as communications from the client to counsel are privileged. *Id.* at 1041. The attorney-client privilege therefore protects those documents such as letters from client to attorney seeking legal advice, and all documents created by the attorney “that are within the normal ambit of the common-law attorney-client privilege...”. *Id.*; *Exxon Mobil Corp.*, 751 F.3d at 381-82 (reversing district court opinion holding that a memo prepared by in house counsel was not privileged because it primarily contained business advice because the memo was drafted during contract negotiations and the business advice was tethered to the legal implications of that advice).

DOJ Plaintiff does not lend credence to the client-to-counsel communication consideration detailed above. *See* ECF 103 at 19-20. Galveston County Defendants have observed this distinction between documents created outside the attorney-client relationship, and those documents created as communications with counsel for legal advice. Defendants have disclosed 126 documents as not privileged under the attorney-client privilege but appear on the log only because they are part of communications with counsel. *See* February 9, 2023 Letter, Ex. 2. But documents such as the initial draft maps

were created within the attorney-client relationship and were created for Mr. Oldham to conduct legal analysis of what was legally permissible for Galveston County under both the Constitution and federal law. Oldham Aff., Ex. 1 ¶ 10. Importantly, this is not hiding anything from the people of Galveston as these maps were not ready for review by the Commissioners Court as a whole or by the public until October 21, 2021. *See* Ex. 1 ¶ 15.

**D. Work product privilege extends to redistricting documents prepared for the Galveston County Commissioners Court as it was engaged in ongoing redistricting litigation with the Petteway plaintiffs.**

Defendants' work product assertions are entirely proper and supported under the governing law. In support of this, Defendants incorporate by reference the responses contained in Sections I.F. and I.G. of Defendants' Response to private Plaintiffs' Motion to Compel. *See* Defs.' Opp. To Pls.' Mot. to Compel at I.F. and I.G.

**II. Defendants' Privilege Assertions Are Proper and Fully Supported.**

To address Plaintiffs' litany of objections, Defendants have grouped the objections into categories of similar documents and by Document ID number as listed on Defendants' amended privilege log, (*see* ECF No. 97-7), and now address each of these categories in turn.

**A. The 2011 Redistricting Cycle and Preclearance Process (Doc IDs 1-21)**

Document ID numbers 1 through 21 of Defendants' amended privilege log all include privileged attorney-client communications and work product generated during Galveston County's 2011 redistricting cycle and preclearance process under Section 5 of the Voting Rights Act.

Specifically, Doc IDs 1 and 2 include a communication from County Judge Mark

Henry to redistricting counsel Joe Nixon requesting legal review of draft redistricting criteria, along with an attachment that is a draft of those criteria that were sent to counsel for review. Galveston County had retained Joe Nixon in 2011 as redistricting counsel. Nixon Engagement Letter, Ex. 3. Judge Henry's purpose for sending this email was to ensure that the Commissioner's Court's redistricting criteria conformed to all of the law's requirements, including compliance with the requirements of the Voting Rights Act and the Fourteenth Amendment (which includes, for example, adherence to the one-person, one-vote principle, *see, e.g., Larios*, 300 F. Supp. 2d at 1329. Plaintiffs' objection to the withholding of Doc ID 2 is unwarranted because it is attached to Doc ID 1 which satisfies all requirements of a privileged attorney-client communication: it seeks both "legal analysis" and "legal opinions," *Alexander*, 2022 U.S. Dist. LEXIS 120295 at \*19, to ensure that the Commissioners Court conducted redistricting in a legal manner. And Plaintiffs' objection is even more mystifying when considering that Defendants have already produced that same underlying document to Plaintiffs. *See Redistricting Criteria*, Ex. 4. Plaintiffs have taken the opportunity to ask nearly every witness about this document during deposition testimony. Henry Dep., Ex. 5 at 181:10-195:2; Giusti Dep., Ex. 6 at 44:24-45:12, 46:5-50:6; Apffel Dep., Ex. 7 at 171:13-175:17. Plaintiffs' objections are without merit.

Doc IDs 3 through 21 involve communications with or including Joe Nixon for the purpose of gathering documents for the preclearance process under Section 5 of the Voting Rights Act, and involve two tracks that were running simultaneously: (1) the traditional preclearance procedure involving submitting information in response to a request from the

DOJ and (2) litigation that was filed by Galveston County on October 17, 2011 in the U.S. District Court for the District of Columbia seeking a declaratory judgment that the Commissioners' redistricting plan complies with Section 5, *see Galveston County v. United States*, 1:11-cv-01837 (D.D.C. 2011). Because these documents were gathered in preparation for known, imminent litigation and, additionally, for the County redistricting counsel's legal review to ensure compliance with the DOJ's preclearance requirements under Section 5, these documents are protected under both attorney-client and work-product privileges. Fed. R. Civ. P. 26(b)(3); *In re Kaiser Aluminum & Chem. Co.*, 214 F.3d at 593; *Alexander*, 2022 U.S. Dist. LEXIS 120295 at \*19.

Furthermore, Doc IDs 17 through 21 involve Joe Nixon's attempt to gather documents in response to a December 19, 2011 deficiency letter the DOJ sent to Galveston requesting additional necessary information to complete its preclearance submission. The underlying document attached to this correspondence has already been produced to Plaintiffs. *See* Dec. 19, 2011 DOJ Letter to Galveston, Ex. 8. Separately, Mr. Nixon's purpose for gathering these documents was for ongoing litigation that Galveston County had *already filed* seeking a declaratory judgment that the Commissioners' redistricting plan complies with Section 5, *see Galveston County v. United States*, 1:11-cv-01837 (D.D.C. 2011). Because these documents pertain both to ongoing litigation and to the process of obtaining Section 5 preclearance rather than the traditional legislative process of drafting and passing legislation, Plaintiffs' arguments that these were created in the "ordinary

course” of legislative business are entirely unavailing.<sup>3</sup>

**B. The 2012 Redistricting Process (Doc IDs 22-26).**

Doc IDs 22 through 26 contain a communication (and attachments) from Galveston County’s GIS Engineer to redistricting counsel Joe Nixon for legal review regarding Commissioner Court precinct splits, and specifically seeks counsel’s review of a draft scenario to resolve the splits. The purpose for seeking counsel’s review was to prepare for conducting settlement negotiations between DOJ and Galveston County regarding the Commissioners Court precincts. This communication was made for the purpose of seeking “legal analysis” and “legal opinions,” *Alexander*, 2022 U.S. Dist. LEXIS 120295 at \*19, from Mr. Nixon. *See Davis*, 636 F.2d at 1041.

**C. Attorney Communications During Litigation in *Petteway v. Galveston*, No. 3:13-cv-308 (S.D. Tex. 2013) (Doc IDs 27-29).**

Doc IDs 27 through 29 contain correspondence (and attachments) between Galveston County attorneys and redistricting counsel regarding the 2007 consent decree in *United States v. Galveston County*, 3:07-CV-377 (S.D. Tex. 2007). This communication was made in the context of active litigation that the Petteway Plaintiffs brought against Galveston County, *see Petteway v. Galveston*, No. 3:13-cv-308 (S.D. Tex. 2013), and provided an explanation of allegations made during the 2007 lawsuit. This is a quintessentially privileged attorney-client communication between counsel analyzing case law that was relevant to an active litigation matter and for the purpose of strategizing in

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<sup>3</sup> Ultimately, DOJ Plaintiff is complaining about documents that were likely already sent to the DOJ as part of the Section 5 preclearance process. The documents that were ultimately submitted to the DOJ are equally available to it.

preparation for trial. The attachments to this communication are likewise protected.

**D. EEOC Complaint Documents (Doc IDs 33, 41, and 43).**

Doc IDs 32 through 43 contain communications between Galveston County attorneys regarding fact-finding in response to a pending EEOC complaint. Plaintiffs appear to agree that these communications are protected under the attorney-client privilege, but object that the underlying facts (EEOC complaints themselves) are not privileged, meaning they should be permitted to intrude into these privileged communications.

The problem with Plaintiffs' objection is that the only time those underlying records appear in Defendants' records is when they were attached to privileged attorney communications. Consequently, the "underlying facts" doctrine does not entitle Plaintiffs to pierce those entirely privileged communications. Attorney-client privilege protects not just communications themselves, but also the underlying facts attached to those communications were discussed confidentially. *See Davis*, 636 F.2d at 1041. Plaintiffs' objection to withholding these documents is without merit.

**E. Phase 1 of 2021 Redistricting: Timing and Strategy (Doc IDs 52-58)**

Doc IDs 52 through 58 contain communications between Judge Henry and his office staff and Galveston County General Counsel or redistricting counsel regarding legal strategy concerning redistricting and how that strategy impacts the timing of the 2021 redistricting process. This includes a response from the Galveston County General Counsel asking about the law's requirements regarding Commissioners serving under new precinct lines, which is seeking purely legal rather than policy advice contrary to Plaintiffs' assertion. Also included is a tax assessor's (*i.e.*, a Galveston County employee, not a third

party as Plaintiffs assert, *see* ECF 102-5 at 6) communication seeking a second legal opinion from Shawn Johnson, who is both a lawyer, licensed in the state of Texas, and a CPA. Mr. Johnson is also the son of Ms. Johnson, the County Tax Assessor. Communications providing such legal analysis in response to a legal question are protected. *See Alexander*, 2022 U.S. Dist. LEXIS 120295 at \*19. Because the primary purpose of these communications is ultimately legal strategy and its implications, and they were prepared in the context of an active litigation matter against Galveston County, *Petteway v. Galveston*, No. 3:13-cv-308 (S.D. Tex. 2013), these documents are protected under both attorney-client and work product privileges.

**F. Phase 2 of 2021 Redistricting: Preparation of Initial Draft Baseline Maps (Doc IDs 59-75)**

These documents involve redistricting counsel's map drawer Tom Bryan's preparation of initial draft maps at the request of Mr. Oldham as a starting point for Mr. Oldham's review to understand the lay of the land and for Mr. Oldham to conduct legal analysis of new redistricting lines for the Galveston County Commissioners Court. These initial drafts were prepared during the very course of the redistricting cycle for 2021, because they were prepared after the September 2021 phone calls between individual Commissioners and Mr. Oldham where the Commissioners confidentially communicated to Mr. Oldham what they wanted to accomplish for the 2021 redistricting cycle. *Oldham Aff.*, Ex. 1 at ¶ 8. Because this involves the process of beginning to draft maps to approximate the wishes of the legislative client and allow redistricting counsel to conduct analysis and determine if it can be done legally, these communications, and the work

product prepared therewith, are protected. Furthermore, because these maps were prepared in the context of an active litigation matter against Galveston County, *Petteway v. Galveston*, No. 3:13-cv-308 (S.D. Tex. 2013), these documents are protected work product as described *supra*. Oldham Aff., Ex. 1 ¶¶ 8-14.

**G. Phase 3 of 2021 Redistricting: Legal Review of Map Drafting Process (Doc IDs 76-146).**

Doc IDs 76-146 were prepared or drafted after the Commissioners had provided comments to redistricting counsel regarding the draft maps prepared by Mr. Bryan. These documents involve legal review of the maps conducted by Mr. Oldham for compliance with the law's requirements and for conducting legal analysis. As described above, *supra* at Section I.A. legislators are entitled to legal counsel (and the associated privilege protections) during the legislative process to draft and analyze legislation, and to provide legal analysis of proposed legislation. Furthermore, these maps were prepared in the context of an active litigation matter against Galveston County, *Petteway v. Galveston*, No. 3:13-cv-308 (S.D. Tex. 2013), and when plaintiff groups were communicating plans with Commissioner Holmes regarding redistricting and their preparations for a potential lawsuit, *see* Defs.' Opp. To Pls. Mot. to Compel at 22-24, meaning these documents are protected work product.

The facts of *LULAC IV* are on point here, and show why Plaintiffs' objections are wrong on the law. 342 F.R.D. at 236. In that case, the United States protested that the nature of the advice was not certain since "a law firm can be retained for non-legal services" and that the law firm was involved "in redistricting in both a legal and non-legal capacity." *Id.*

Chairman Hunter had “expressly stated in [his] deposition that, in this context, he asked [the law firm] to “run the legal” on House Bill 1, and the United States asked to hear their ensuing suggestions.” *Id.* The Court held that this “directly calls for Butler Snow’s legal advice,” which was protected as privileged. *Id.* The same is true for Mr. Oldham, who was plainly retained for his legal advice and whose function Judge Henry and Commissioner Apffel testified was to work as redistricting counsel for Galveston County to ensure the maps were legally compliant. ECF Nos. 97-9 at 6-8 (103:10-128:17), 97-10 at 16 (221:12-21), 97-10 at 22 (261: 7-16).

Further undermining Plaintiffs’ objections here is that many of these documents withheld as privileged communications were otherwise produced as underlying facts. *See, e.g.,* Exs. 9, 10, and 11. Because these underlying facts themselves have already been produced to Plaintiffs separately, objection to their withholding here is without merit.

**H. Legal Advice Regarding Letter From League of Women Voters (Doc IDs 147, 150, and 151).**

Doc IDs 147 through 151 contain communications between Galveston County General Counsel, Mr. Oldham, and redistricting counsel at Holtzman Vogel seeking and providing legal opinions regarding the legal implications of a letter from the League of Women Voters of Texas outlining the views of that organization regarding the redistricting process. These communications plainly call for legal advice on the redistricting process, as Mr. Oldham and Holtzman Vogel counsel had been retained to provide; these are thus protected under attorney-client privilege. *Cf. LULAC IV*, 342 F.R.D. at 236. And because the documents were prepared in the context of an active, closely-related litigation matter

against Galveston County, *Petteway v. Galveston*, No. 3:13-cv-308 (S.D. Tex. 2013), these documents are likewise protected work product as described above.

Furthermore, the underlying letter has been produced to Plaintiffs, *see* Oct. 29, 2021 LWV Letter to Galveston, Ex. 12, obviating concerns about not producing underlying facts.

**I. Emails containing and discussing revisions to Map Proposal 2's voting precincts and metes and bounds descriptions for districts to ensure compliance with the law (Doc IDs 152-200).**

Sending emails regarding revisions to Map Proposal 2's voting precincts and metes and bounds descriptions for various districts to Mr. Oldham and Mr. Ready for their legal opinions, advice, and analysis, in the context of separate closely-related ongoing litigation, *see supra*, and in anticipation of imminent litigation, is protected under both work product and attorney-client privileges. Counsel requested that Mr. Sigler draft these metes and bounds descriptions and Mr. Sigler sent these descriptions to counsel for their legal advice and review. Advice of counsel was sought regarding the metes and bounds precisely due to the prospect of future litigation, and these documents were reviewed for that purpose. Oldham Aff., Ex. 1 ¶¶ 3-7, 17; *see also LULAC v. Abbott*, 2022 U.S. Dist. LEXIS 131217, at \*35 (W.D. Tex. July 25, 2022) (work-product protections apply when pertinent documents were created by the prospect of potential litigation). Documents sent to attorneys specifically for their advice regarding the legality of proposed voting precincts or districts are within the ambit of attorney-client privilege and are properly withheld.

**J. Drafting documents/redistricting orders in advance of the November 12, 2021 meeting; reviewing drafts for legal compliance and sufficiency (Doc IDs 201-324).**

Documents or redistricting orders drafted in advance of the November 12, 2021 meeting and attached to privileged communications with redistricting counsel to ensure compliance with the law's requirements are covered under attorney-client privilege. These documents request information as to what is legally required by the Commissioners to consider and vote on any new maps. Many of these documents were sent or received by the County's General Counsel or redistricting counsel for the purpose of obtaining or providing legal advice. Any advice sought from or provided by an attorney regarding potential county business prior to disclosure to the general public is protected. *LULAC IV*, 342 F.R.D. at 236 Furthermore, as discussed *supra*, many of the underlying draft documents have already been produced to Plaintiffs, obviating Plaintiffs' concerns about withholding underlying facts.

**K. Internal emails between Holtzman Vogel and Mr. Oldham about strategy and progress (Doc IDs 325-328).**

Internal emails between Holtzman Vogel and Mr. Oldham discussing legal strategy are quintessentially protected documents under the attorney-client and work-product privileges. In fact, these documents specifically mention that litigation is anticipated. Such privileged discussions among attorneys about legal strategy and answering questions from the County General Counsel Mr. Ready are protected. *In re Kaiser Aluminum & Chem. Co.*, 214 F.3d at 593 (quoting Fed. R. Civ. P. 26(b)(3)).

**L. Documents regarding the DOJ's demands as part of their investigation into potential violations of section 2 of the VRA (Doc IDs 335, 339-40).**

On November 22, 2021, Commissioner Clark received a question regarding the redistricting process from a local newspaper. Doc ID 339. The following day, Mr. Ready

received a phone call from three DOJ attorneys stating they had received complaints regarding the County's redistricting. Doc ID 333. He also provided legal counsel to Commissioner Clark on strategy regarding the same. Doc ID 335. Later, Holtzman Vogel attorneys and County General Counsel Mr. Ready corresponded via email to discuss legal strategy regarding how to respond to these demands. Such exchanges are covered by attorney-client privilege and the work-product doctrine because they were prepared in the context of ongoing litigation and in anticipation of imminent litigation as described *supra*. See *LULAC IV*, 342 F.R.D. at 236; see also *In re Kaiser Aluminum*, 214 F.3d at 593.

**M. Communications about Response to DOJ's demand (Doc IDs 383-457)**

Doc IDs 383 to 457 include Map Proposal 1 and 2 shapefiles, news articles covering the proposed redistricting maps, and written public comments. Many of these have been provided to the Plaintiffs or are publicly available. Doc. IDs 383, 403, 423, 443-448, and 453 include emails between counsel about how to respond to the DOJ's demand, which are protected by the attorney-client privilege and were prepared in anticipation of litigation under the work-product doctrine. See *id*. Additionally, these underlying documents have already been produced to Plaintiffs, as described *supra*.

**CONCLUSION**

For the above-mentioned reasons, DOJ Plaintiff's Motion to Compel should be denied.

Dated: February 16, 2023

Respectfully submitted,

/s/ Dallin B. Holt

Dallin B. Holt

Attorney in Charge

Texas Bar No. 24099466

S.D. of Texas Bar No. 3536519

Jason B. Torchinsky\*

Shawn T. Sheehy\*

[dholt@holtzmanvogel.com](mailto:dholt@holtzmanvogel.com)

[jtorchinsky@holtzmanvogel.com](mailto:jtorchinsky@holtzmanvogel.com)

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HOLTZMAN VOGEL BARAN

TORCHINSKY & JOSEFIK PLLC

15405 John Marshall Hwy

Haymarket, VA 2019

P: (540) 341-8808

F: (540) 341-8809

\* *Admitted pro hac vice*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was served on all counsel of record on February 16, 2023, through email and on February 21, 2023, through the CM/ECF system.

/s/ Dallin B. Holt  
Dallin B. Holt

**IN THE UNITED STATES DISTRICT  
COURT FOR THE SOUTHERN  
DISTRICT OF TEXAS GALVESTON  
DIVISION**

**TERRY PETTEWAY et al.,**

**Plaintiffs,**

**v.**

**GALVESTON, TEXAS et al.,**

**Defendants.**

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**Civil Action No. 3:22-CV-00057**

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**ORDER DENYING UNITED STATES’ MOTION TO COMPEL (ECF 103)**

On this day, the Court considered the Motion to Compel filed by the DOJ Plaintiff (ECF 103). After considering the record and arguments of counsel the Court DENIES the Motion in its entirety.

Dated: \_\_\_\_\_, 2023

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United States Magistrate Judge Andrew M. Edison

# **EXHIBIT 1**

IN THE UNITED STATES DISTRICT  
COURT FOR THE SOUTHERN  
DISTRICT OF TEXAS GALVESTON  
DIVISION

TERRY PETTEWAY et al.,

Plaintiffs,

v.

GALVESTON, TEXAS et al.,

Defendants.

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Civil Action No. 3:22-CV-00057

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**DECLARATION OF DALTON L. OLDHAM IN SUPPORT OF DEFENDANTS’  
OPPOSITION TO BOTH PRIVATE PLAINTIFFS’ AND THE UNITED STATES’  
MOTIONS TO COMPEL**

I, Dalton L. Oldham, pursuant to 28 U.S.C. § 1746, do declare under the penalty of perjury that the following is true and correct:

1. My name is Dalton L. Oldham and I am above the age of 18 and I am otherwise competent to testify.
2. The facts contained in this affidavit are within my personal knowledge.
3. I have practiced redistricting law for almost 34 years.
4. I provided legal advice and representation to Galveston County during the 2011 round of redistricting. I was then associated with the law firm of Beirne, Maynard & Parsons, L.L.P. when I provided these legal services. I also represented Galveston County in the litigation regarding the 2011 Commissioners Court precinct map and the subsequent Justice of the Peace and Constable districts. During the 2021 redistricting process, because

of my experience in the 2011 litigation, I was aware that litigation over redistricting in Galveston County was both ongoing and anticipated. In fact, some of the same counsel that I was opposed to in 2011 have sued the county here in the instant lawsuit. During the 2021 redistricting process, I anticipated that these attorneys would build a case against the county Commissioner Court precincts and file a lawsuit.

5. On or about April 5, 2021, Galveston County retained the law firm of Holtzman Vogel to provide “legal representation and advice regarding redistricting in Galveston County, Texas, including provision of a technical expert to draw the map.”

6. I associated with Holtzman Vogel in the provision of legal services during the 2021 redistricting cycle.

7. Just as I did in 2011, I provided Galveston County with legal advice and services relating to the creation of the Galveston County Commissioners Court precincts and subsequent Justice of the Peace and Constable Districts.

### **Redistricting Process**

8. In September of 2021, I had telephone conference calls with each of the Commissioners and County Judge Henry. The purpose of these phone calls was for me to conduct fact-finding conversations with my clients, the Commissioners and County Judge Henry, about the changes that they wanted to make to the boundaries of the Commissioners Court precincts. My purpose on the calls was to gather facts from my clients to assist me in providing legal advice about the legal implications of what my clients were requesting. It also assisted me in conducting legal analysis to ensure a map that complied with the U.S. Constitution and the Voting Rights Act.

9. Then, on or around October 15, 2021, I began working with Tom Bryan who, as a map-drawing expert and the one who drew the maps here, was helping Jason Torchinsky, Phil Gordon, and myself to provide legal advice to Galveston County.

10. At my direction, Mr. Bryan prepared initial baseline maps. These maps were drafted to assist me in providing legal advice. I needed to see what was legally permissible in Galveston County under the U.S. Constitution and the Voting Rights Act. I also needed to determine if my clients' requests were legally permissible under the U.S. Constitution and the Voting Rights Act.

11. Importantly, these maps were never shown to the Commissioners or County Judge Henry or any of their respective staff members.

12. I met with County Judge Henry and the Commissioners individually or in pairs of two on or about October 19, 2021. I showed them only two maps, the first drafts of what became Map Proposal 1 and Map Proposal 2.

13. The purpose of these meetings was to receive feedback from the Commissioners on this initial draft and provide legal advice concerning the legal implications of my clients' feedback.

14. Based upon my legal analysis of my clients' feedback, I instructed Mr. Bryan to adjust the contours of Map Proposal 1 and Map Proposal 2.

15. When these adjustments were completed, on or about October 21, 2021, I concluded that the maps comported with what my clients requested and complied with the U.S. Constitution and the Voting Rights Act. I then concluded that Map Proposal 1 and Map Proposal 2 were ready for publication and consideration for the Commissioners Court

as a whole and by the public.

16. All that remained to be completed with Map Proposal 1 and Map Proposal 2 was that the underlying data needed to be refined. These updates were shared with Holtzman Vogel and Galveston County's General Counsel. The lines contained in the shapefiles for Map Proposal 1 and Map Proposal 2 were not altered. This process was done between October 21, 2021 and October 28, 2021.

17. During the drafting of the Metes and Bounds process, I requested that Nathan Sigler draft the boundary descriptions and transmit those descriptions to me, my co-counsel at Holtzman Vogel, and Mr. Paul Ready so that we could review the descriptions to ensure that they were legally compliant.

18. At all times relevant for the 2021 round of redistricting, I was acting in my capacity as a lawyer to Galveston County, working in association with Holtzman Vogel, providing legal advice to my clients.

I, Dalton L. Oldham, pursuant to 28 U.S.C. § 1746, do declare under the penalty of perjury that the foregoing is true and correct:

/s/ Dalton L. Oldham

## **EXHIBIT 2**

# Holtzman Vogel

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

February 9, 2023

Hon. Andrew M. Edison  
United States Magistrate Judge  
United States Courthouse  
601 Rosenberg, Seventh Floor  
Galveston, TX 77550

RE: *Petteway et. al, v. Galveston County, et al.*, Civil Action No. 3:22-cv-00057  
Submitted via Federal Express Overnight: Tracking Number: 771259913633

Judge Edison:

During the January 30, 2023 hearing concerning two discovery dispute letters, this Court requested that Defendants submit the documents described on Defendants' privilege log for *in camera* review. Please find enclosed a thumb drive labelled "CA 3:22-cv-00057; Confidential: For Chambers' Eyes Only: Defendant Galveston County Attorney-Client Materials" containing all the documents described on Defendants' privilege log. (Exhibit 1, ECF 97-7). The documents are Bates labeled with an identifying ID number that corresponds to the document ID number listed on the privilege log that Defendants are submitting to the Court. These document ID numbers also correspond to the relevant entry number on Defendants privilege log.

Some of the documents contained on the thumb drive are shapefiles of maps. To review these shapefiles requires specific proprietary software. If the Court would like for Defendants to procure a license for this Court to review the shapefiles, Defendants will do so promptly.

Additionally, Defendants have already independently produced 126 of the attachments listed on the privilege log (Ex. 1, ECF 97-7). These attachments are withheld and listed on the privilege log because they were part of a communication to legal counsel for legal analysis, representation, and advice. These independently disclosed attachments are noted on the privilege log which is also contained on the thumb drive. Defendants have provided the Bates numbers of those produced documents and those documents are listed on the following entry numbers:

# Holtzman Vogel

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIK PLLC

**Entry Number:**

2	120	198	282	384	414
17	121	200	283	385	415
18	142	203	284	386	416
20	144	205	285	387	423
21	145	215	311	388	424
22	149	217	312	389	425
23	151	230	313	390	426
26	153	237	314	391	427
27	180	238	315	392	428
34 <sup>1</sup>	183	239	316	393	429
35 <sup>1</sup>	184	240	339	394	431
36 <sup>1</sup>	185	241	342	395	432
37 <sup>1</sup>	186	242	344	403	433
39	187	250	345	404	434
	188	262	346	405	435
69	190	263	352	406	436
	192	264	354	407	450
77	193	265	357	408	455
79	194	266	374	409	
94	195	267	378	411	
118	196	280	379	412	
119	197	281	383	413	

Defendants thank the Court for its time and consideration.

Sincerely,

*/s/*

Shawn Sheehy  
Counsel to Defendants

CC: Cover letter sent to all counsel of record via electronic mail.

---

<sup>1</sup> These emails were produced in redacted form as a part of an ongoing conversation string.

## **EXHIBIT 3**

AGENDA

ITEM

#17

BEIRNE, MAYNARD & PARSONS, L L P

1100 POST OAK BOULEVARD  
SUITE 2500  
HOUSTON, TEXAS 77056-3000

JOSEPH M. NIXON  
BOARD CERTIFIED  
CIVIL TRIAL LAW  
TEXAS BOARD OF LEGAL  
SPECIALIZATION

(713) 623-0887  
FAX (713) 960-1527

Direct Dial (713) 871-6809  
Email jnixon@bmpilp.com

May 16, 2011

Hon. Mark Henry  
Galveston County Judge  
722 Moody, Suite 200  
Galveston, Texas 77550

*Via E-mail: [Mark.Henry@co.galveston.tx.us](mailto:Mark.Henry@co.galveston.tx.us)*

Re 2011 Redistricting of Galveston County Commissioners Precincts, Justice of the Peace Precincts, Constable Precincts, Election Precincts and Pre-Clearance Submission Project, Engagement Letter

Dear Galveston County Judge.

This letter is to confirm that our firm has undertaken to represent GALVESTON COUNTY at the request of the Commissioners' Court in connection with the preparation of a Redistricting Plan for Galveston County Commissioners' Precincts, Justice of the Peace Precincts, Constable Precincts, Election Precincts and preparation and submission of a Pre-Clearance Submission on behalf of Galveston County under the scope of work as described in Exhibit A, the terms and conditions set forth below and those contained in the accompanying Client Representation Memorandum (Project).

Our fees will be based on the following hourly billing rates charged for each attorney or other professional who works on the matter, as follows

Joe Nixon, Trey Trainor and Dale Oldham, Attorneys at Law \$365 per hour  
We do not charge for the services of secretarial, technical and other support staff  
Should a demographer be required, their services will be billed as expenses at our cost

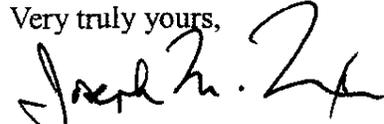
As we have discussed, Joseph M. Nixon will be the supervising attorney handling this Project and will be primarily responsible for this matter. The total amount to be billed for our services for all services rendered, exclusive of litigation should litigation occur, will not exceed \$80,000, exclusive of reimbursement expenses for the completion of this Project. We believe a retainer in the amount of \$2,500 is appropriate as described in the attached Client Representation Memorandum.

Fees and reimbursable disbursements will be billed monthly and are payable in accordance to what is commonly referred to as the Texas Prompt Payment Act. We will provide you with a summary of work and timekeeper hours in accordance with our normal billing practices. All invoices will be provided to the Galveston County Judge, 722 Moody, Suite 200, Galveston, Texas 77550 for approval and payment.

To begin our representation, please confirm Galveston County agrees to the terms set forth in this engagement letter, Exhibit A, and the accompanying Client Representation Memorandum by providing us with a signed copy of the attached Client Representation Memorandum and the retainer we are requesting

We are pleased to have this opportunity to represent Galveston County and look forward to working with you.

Very truly yours,



Joseph M. Nixon

JMN/ljs

## Client Representation Memorandum

This Memorandum sets forth the terms and conditions under which Beirne, Maynard & Parson, L.L.P. (the "Firm") has undertaken the representation described in the accompanying engagement letter dated May 13, 2011. **We recommend that you obtain separate and independent counsel to review and provide you with advice regarding this agreement.** If, after reviewing this document, the Client has any questions, please feel free to discuss them with us.

1. **Scope of Representation** The Firm undertakes to represent GALVESTON COUNTY (hereinafter "the Client") solely in connection with the matter described in our engagement letter and Exhibit A. In the event that the Client requests us to undertake additional matters for the Client or that the scope of our representation is expanded, such additional representation will be governed by the terms and conditions of this agreement unless we mutually agree otherwise. Our representation will be deemed concluded at the time that we have completed the Project and rendered our final bill for services on the matter described in our engagement letter and Exhibit A or any such additional matters.

Unless modified by our engagement letter and Exhibit A, our representation is limited to providing services solely for Galveston County, acting only through its Commissioners' Court. Our Firm's representation does not include a representation of the interests of other Galveston County elected or appointed officials or its employees. Our Firm's professional responsibilities are owed only to Galveston County, acting only through its Commissioners' Court that is the client of the Firm.

2. **Fee for Legal Services** Our Firm's fees for legal services rendered are based on our current hourly billing rates for attorneys, paralegals, other non-lawyer professionals and staff assigned by the Firm to this matter are as set forth in our engagement letter.

3. **Costs and Expenses** Certain costs and expenses incurred by us on the Client's behalf will be billed to the Client in the Client's monthly statement. These costs include, but are not limited to, long-distance telephone charges, photocopying charges, courier and overnight delivery charges, travel (including mileage, parking, airfare, lodging, meals and ground transportation), facsimile transmission, costs incurred in computerized research and litigation support systems, filing fees, witness fees and reimbursement for the cost of any third parties described below to the extent such costs are paid initially by the Firm.

During the course of our representation, it may be appropriate to hire third parties to provide services on the Client's behalf. If such is needed, pre-approval must be sought from the Galveston County Commissioners' Court, acting on behalf of the Client. These services may include consulting or testifying experts, investigators, providers of computerized litigation support, video tape services and court reporters. The Firm may assume responsibility for retaining the appropriate service providers, the Client will be responsible for reimbursing all pre-approved fees and expenses directly to the Firm.

4. **Billing** Unless otherwise agreed in our engagement letter, invoices for legal services, including fees, costs and expenses, will be billed on a monthly basis. Each invoice is due and payable in accordance with the terms and provisions of what is commonly called the Texas Prompt Payment Act.

5 **Retainer.** We require a retainer of \$ 2500 in this matter at the beginning as part of initial consultation. In the event that our billings become past due, we are authorized to draw down on the retainer to effect payment in whole or in part. In the event our bills are paid timely, we will refund the retainer at the conclusion of our representation or, if your retainer was used to discharge some part of the Client's fees or expenses, we will refund the balance, if any remaining.

6 **Relationship With Other Clients.** Because the Firm has a large nationwide litigation practice, we frequently represent a number of clients that are competitors, customers or suppliers, or have other commercial, and at times legal, interests that are adverse to one another. It is possible that during the time we are representing the Client, another client may have disputes with the Client that are unrelated to the matters we are handling for the Client.

The Client reserves the right to review any potential conflicts after Firm gives notice and Client will make a decision as to waiver of potential or actual conflict. In determining a potential or actual conflict against Client the Firm agrees that it will undertake such representation only if there is not substantial relationship between any matter in which we are representing or have represented the Client and the matter for the other client. And, the Firm will take steps to ensure that any confidential information that we have received from the Client will not be available to the lawyers and other Firm personnel involved in the representation of the other client. If these conditions are satisfied, the Client agrees that we may undertake the adverse representation, and that all conflict issues will be deemed to have been waived by the Client.

7 **Termination.** The Client may terminate this agreement by giving thirty (30) days written notice to: Beirne, Maynard & Parsons, L L P, ATTN Joseph M Nixon, 1300 Post Oak Boulevard, Suite 2500, Houston, Texas 77056-3000. Upon termination of our representation, the Client's papers and property will be returned to the Client. Our own files pertaining to the matter will be retained. These firm files include, for example, firm administrative records, time and expense reports, personnel and staffing materials, and credit and accounting records, and a copy of internal lawyers' work product such as drafts, notes, internal memoranda, and legal and factual research, including investigative reports, prepared by or for the internal use of lawyers on the matter. At the Client's request, such work product will be promptly supplied to the Client.

8 **Billing Questions.** Clients are encouraged to promptly discuss any questions or concerns they have about invoices with the Firm's accounting department or with the partner in charge of the representation at no cost to Client.

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9 **Problem Avoidance – Dispute Resolution.** Although we do not expect any disputes to arise, this paragraph shall apply in the unlikely event of any disputes, including but not limited to disputes regarding, arising from, or related to (directly or indirectly), our representation or relationship and any inducement to enter such relationship or this agreement, this agreement or client representation memorandum, this dispute resolution clause, the interpretation, validity, scope, or breach of any duties or this agreement or provision, the amount of fees or the quality of our services, and all claims of any kind, whether contractual, non-contractual, tort, common law, equitable, or statutory in nature (collectively, "Disputes") First, such Disputes shall be resolved by a representative of the Firm meeting with the Client to discuss

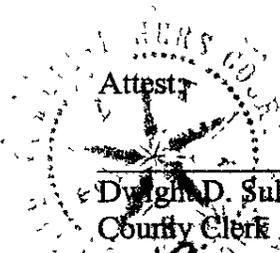
the problem and attempt to resolve the matter amicably and to the satisfaction of both parties (Discussions”). Second, in the highly unlikely event that such Discussions are not successful, the matter may be submitted to non-binding mediation in Galveston County, Texas with a mutually acceptable mediator. Third, in the highly unlikely event that neither the Discussions or mediation resolves the issue the Client and the Firm have the right to pursue any legal or equitable remedy

10 **Severability.** If it is determined that any portion or provision of this agreement (including but not limited to the dispute resolution clause) is invalid or unenforceable, then the invalidity or unenforceability of that portion or provision shall not affect the validity or enforceability of any other portion or provision of this agreement, and all other portions and provisions shall remain in full force and effect

The Client’s agreement to this engagement constitutes your acceptance of the foregoing terms and conditions. If any of them is unacceptable to the Client, please advise us now so that we can resolve any differences and proceed with a clear, complete, and consistent understanding of our relationship.

Accepted

  
\_\_\_\_\_  
Mark Henry  
County Judge

  
Attest  
\_\_\_\_\_  
Dwight D. Sullivan  
County Clerk  
By:  Deputy  
Brandy Chapman

Date: May 24, 2011  
On behalf of (GALVESTON COUNTY)

**EXHIBIT "A"**

**SCOPE OF WORK BY FIRM**

- 1 Analysis of and presentation to the Commissioners' Court of the 2010 Census data and preparation of initial consultation,
  - 2 Presentation to the Commissioners' Court regarding the necessary steps in the redistricting process.
  3. Obtain input from any County Commissioner on their specific precinct and Obtain input from the County Commissioners Court on the Realignment of the County Commissioners Precincts, Justice of the Peace Precincts, and Constable Precincts and Election Precincts,
  - 4 Provide timelines and tasks per timelines, including any notice requirements. Any notice requirements shall be prepared by Firm;
  - 5 Prepare proposed plans, maps, drawings, and data tables, for the boundaries of Galveston County Commissioner Precincts, Voter (Election) precincts, and corresponding Justice of the Peace Precincts, and Constable Precincts in accordance with Galveston County's input and consistent with the Redistricting Laws for approval at any noticed meeting;
  - 6 Presentation at any noticed Commissioners Court meeting or public hearings of any preliminary plan, maps, drawings, data tables for approval,
  7. Preparation and submission of final submission documents, such as the final approved Redistricting Plan for the Galveston County Commissioners Precincts, Justice of the Peace Precincts, and Constable Precincts and Election Precincts, to the U. S Department of Justice for Pre-Clearance or upon Client's request through three judge panel as described in the Voting Rights Act;
  8. Make periodic presentations to Commissioners court and at public hearings throughout the terms of this Agreement.
  - 9 Represent Galveston County and members of its Commissioners' Court in event of litigation relating to the redistricting process at a fee to be negotiated at an additional fee of \$365 per hour for attorneys.
-

## **EXHIBIT 4**



## THE COUNTY OF GALVESTON

On this the 7th day of June, 2011, the Commissioners' Court of Galveston County, Texas convened in a regularly scheduled meeting with the following members thereof present;

MARK HENRY, County Judge  
PATRICK DOYLE, Commissioner, Precinct 1  
KEVIN O'BRIEN, Commissioner, Precinct 2  
STEPHEN HOLMES, Commissioner, Precinct 3  
KENNETH CLARK, Commissioner, Precinct 4  
DWIGHT SULLIVAN, County Clerk

when the following proceedings, among others, were had, to-wit:

### **GALVESTON COUNTY RESOLUTION ADOPTING CRITERIA FOR USE IN REDISTRICTING 2011 PROCESS**

WHEREAS, this Commissioners Court acting on behalf of Galveston County has certain responsibilities for redistricting under federal and state law including, but not limited to, Amendments 14 and 15 to the United States Constitution, U.S.C.A. (West 1987), and the Voting Rights Act, 42 U.S.C.A. § 1973, *et seq.* (West 1987 and Supp. 1999); Article 5, Section 18 of the Texas Constitution (Vernon 1993 and Supp. 2000); and Tex. Gov't Code Ann. §§ 20058.001 and 2058.002 (Vernon Pamph. 2000); and

WHEREAS, on review of the 2010 census data it appears that a population imbalance exists requiring redistricting of the County's Commissioner Precincts; and

WHEREAS, it is the intent of the County to comply with the Voting Rights Act and with all other relevant law, including *Shaw v. Reno* jurisprudence and the Consent Judgment and Election Order in *Hoskins v. Hannah, et.al*; and

WHEREAS, a set of established redistricting criteria will serve as a framework to guide the County in the consideration of redistricting plans; and

WHEREAS, established criteria will provide the County a means by which to evaluate and measure proposed plans; and

WHEREAS, redistricting criteria will assist the County in its efforts to comply with all applicable federal and state laws; and

WHEREAS, although it is establishing the following guidelines, the County may consider other information, factors and guidelines in making its final determination;

NOW THEREFORE BE IT RESOLVED, that the County, in its adoption of a redistricting plan for Commissioner and Justice of the Peace/Constable Precincts, will adhere to the following criteria:

1. Where possible, easily identifiable geographic boundaries should be followed.
2. Communities of interest should be maintained in a single district, where possible, and attempts should be made to avoid splitting neighborhoods. This does not mean, however, that it is necessary or appropriate to include the County's larger cities in a single commissioner precinct. To the contrary, there has been a traditional practice of splitting cities, such as Galveston, Texas City, League City, so that they are in two or more commissioner precincts. Since the cities have different characteristics and economies (e.g. tourism and maritime vs. industrial and petrochemical vs. primarily suburban), ensuring that these communities are represented by more than one commissioner helps to avoid isolating a community and encourages a county-wide perspective by the commissioners court.
3. To the extent possible, districts should be composed of a whole voting precincts. Where this is not possible or practicable, districts should be drawn in a way that permits the creation of practical voting precincts and that ensures that adequate facilities for polling places exist in each voting precinct.
4. Although it is recognized that existing districts will have to be altered to reflect new population distribution, any redistricting plan should, to the extent possible, be based on existing districts.
5. Commissioner precincts must be configured so that they are relatively equal in total population according to the 2010 federal census. In no event should the total deviation between the largest and the smallest commissioner precinct exceed ten percent. The County will attempt to achieve a deviation that is less than ten percent under the data released by the Census Bureau.
6. The districts should be compact and composed of contiguous territory. Compactness may contain a functional, as well as a geographical dimension.
7. In drawing justice of the peace/constable precincts, the court will consider the level of workload, the location of county facilities, and the convenience of the people.
8. The redistricting plan should be narrowly tailored to avoid retrogression in the position of racial minorities and language minorities as defined in the Voting Rights Act with respect to their effective exercise of the electoral franchise.

9. The redistricting plan should not fragment a geographically compact minority community or pack minority voters in the presence of polarized voting so as to create liability under section 2 of the Voting Rights Act, 42 U.S.C. § 1973.

UPON MOTION DULY MADE AND SECONDED, the above Resolution was unanimously passed this \_\_\_\_ day of \_\_\_\_\_, 2011.

GALVESTON COUNTY TEXAS

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Mark Henry, County Judge

ATTEST:

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Dwight Sullivan, County Clerk

## **EXHIBIT 5**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

HONORABLE TERRY )  
PETTEWAY, et al. )  
 ) Case No. 3:22-cv-00057  
VS. )  
 )  
GALVESTON COUNTY, et )  
al. )

ORAL AND VIDEOTAPED DEPOSITION OF MARK A. HENRY  
JANUARY 17, 2023

ORAL AND VIDEOTAPED DEPOSITION OF MARK A. HENRY,  
produced as a witness at the instance of the Plaintiff and  
duly sworn, was taken in the above styled and numbered  
cause on Tuesday, January 17, 2023, from 9:08 a.m. to  
6:07 p.m., before Janalyn Elkins, CSR, in and for the  
State of Texas, reported by computerized stenotype  
machine, via Zoom, pursuant to the Federal Rules of Civil  
Procedure and any provisions stated on the record herein.

1 with the resolution I sent you for redistricting rules.

2 Right?

3 A. Yes.

4 Q. And she's referring to you, right?

5 A. That's what she says, yes.

6 Q. Do you have any reason to think she would lie  
7 to Patricia Grady about what you had told her about  
8 being good to go with the resolution?

9 A. No, I have no reason to think that.

10 Q. Okay. Let's go PDF page 3. So that exchange,  
11 that last exchange happened at 9:50 a.m. And this is an  
12 email from you to J. Nixon at bmplip.com. Do you know  
13 who J. Nixon is?

14 A. Joe Nixon, yes.

15 Q. And it's at June 2, 2011, same day at  
16 9:59 a.m.; is that right?

17 A. Yes.

18 Q. And the subject is Galveston County Resolution,  
19 correct?

20 A. Yes.

21 Q. And you say, (Reading:) Joe, in 2011 Galveston  
22 County Commissioners Court adopted a resolution  
23 establishing the court's criteria for redistricting.  
24 Attached is a copy of the proposed resolution for 2011.  
25 Do you see any issues? I would like to have it on the

1 agenda for Tuesday.

2 Is that right?

3 A. Yes, that's what it says.

4 Q. And you sent this email, correct?

5 A. Yes, it appears so.

6 Q. And let's scroll to the next page, PDF page 4.

7 And does this document look familiar to you? And maybe

8 Alexa can slowly scroll through this on the next page.

9 A. It appears to be the same thing we looked at  
10 previously.

11 Q. Right. So I want to start with the next page,  
12 PDF page 5 of the document. And we went over this a  
13 little bit before but it says, (Reading:) Now,  
14 therefore, be it resolved that the County in its  
15 adoption of the redistricting plan for commissioner and  
16 justice of peace/constable precincts will adhere to the  
17 following criteria.

18 I would like you to take a few minutes and  
19 read the criteria 1 through --

20 MS. KLEIN: Alexa, if you could scroll  
21 down.

22 Q. (BY MS. KLEIN) -- all the way to 9 on the next  
23 page. And I encourage you to -- if you need to zoom in,  
24 ask Alexa to zoom in for you, whatever you need to do to  
25 read this. But take a few minutes and let me know when

1 you're done reading through that.

2 A. You just want me to read through the criteria  
3 that we didn't adopt?

4 Q. Exactly.

5 A. Okay.

6 MS. KLEIN: Alexa, can you scroll down?

7 Q. (BY MS. KLEIN) You can ask Alexa to scroll  
8 down directly.

9 A. Okay.

10 Q. So let's go back up to -- thank you for reading  
11 that. Let's go back up to the following page that has  
12 all the "whereas" clauses. This is the first page of  
13 the criteria. Keep it right there.

14 And we went over these before, but I'm  
15 going to ask you again. When I asked you before, I  
16 understood you to say you didn't know about whether you  
17 agreed with these statements because it would depend on  
18 the criteria. So now you've read a set of potential  
19 criteria for the 2011 process, so I'm going to ask you  
20 the same questions again having read those.

21 So the fourth one from the top, (Reading:)  
22 Whereas, a set of established redistricting criteria  
23 will serve as a framework to guide the County in the  
24 consideration of redistricting plans.

25 Do you agree with that statement when it

1 comes to the redistricting criteria you just read?

2 MR. RUSSO: Object. Incomplete  
3 hypothetical. Calls for speculation, and asked and  
4 answered.

5 THE WITNESS: We didn't adopt this. So I  
6 don't know how -- what was the question?

7 Q. (BY MS. KLEIN) Would those criteria serve as a  
8 framework?

9 A. Had we adopted them, possibly.

10 Q. What about the next one, (Reading:) Whereas,  
11 establish criteria will provide the County a means by  
12 which to evaluate and a measure proposed plan.

13 Do you agree that those criteria you just  
14 read would provide a means to evaluate and measure  
15 proposed plans?

16 A. I have no way of knowing.

17 Q. How -- why not?

18 A. We didn't adopt them. So we didn't get -- this  
19 this was copy and pasted from 2001. I mean, I did not  
20 write this. It's simply a review of what they did in  
21 2001.

22 Q. Do you think -- I mean, do you disagree with  
23 that statement that criteria would help evaluate and  
24 measure proposed plans?

25 A. It's possible it will help.

1 MR. RUSSO: Objection, calls for impartial  
2 and incomplete hypothetical.

3 You can answer.

4 And asked and answered.

5 Q. (BY MS. KLEIN) It's possible is your answer?

6 A. Possible.

7 Q. And what about the third one -- the second one  
8 from the top, (Reading:) Whereas, redistricting  
9 criteria will assist the County in its efforts to comply  
10 with all applicable federal and state laws.

11 Do you agree with that statement in light  
12 of the criteria you just read?

13 MR. RUSSO: Object, incomplete hypothetical  
14 and assumes -- I'm sorry, asked and answered.

15 THE WITNESS: I don't see how that criteria  
16 would assist the county in its efforts to comply with  
17 the federal law.

18 Q. (BY MS. KLEIN) Why not?

19 A. Because I don't know the federal law well  
20 enough to know -- again, that's why we hire lawyers.

21 Q. Okay. Let's scroll down to .9 of the criteria.  
22 .9 says, (Reading:) The redistricting plan should not  
23 fragment a geographically compact minority community or  
24 pack minority voters in a presence of a -- of polarized  
25 voters so as to create liability under Section 2 of the

1 Voting Rights Act.

2 Do you know what's meant by, "should not  
3 fragment a geographically compact minority community"?

4 MR. RUSSO: Objection, calls for a legal  
5 conclusion.

6 Q. (BY MS. KLEIN) I'm not asking for a legal  
7 conclusion. I'm --

8 THE REPORTER: Hold on.

9 MS. KLEIN: Sorry, Ms. Elkins.

10 Q. (BY MS. KLEIN) I'm not going to ask you for a  
11 legal conclusion about the Voting Rights Act. I'm going  
12 to ask you for your understanding of these words as they  
13 are commonly used in the English language.

14 Do you understand the meaning of fragment a  
15 geographically compact minority computer -- community?

16 A. Yes.

17 Q. What does that mean to you?

18 A. I don't know that it needs further explanation.  
19 It means don't fragment a geographically compact  
20 minority community.

21 Q. Would -- so fragment means like break apart,  
22 right?

23 A. Right.

24 Q. Okay. So let's -- and that common meaning is  
25 related to compliance under this criteria to Section 2

1 of the Voting Rights Act, correct?

2 MR. RUSSO: Objection, calls for  
3 speculation and calls for a legal conclusion.

4 THE WITNESS: I guess.

5 Q. (BY MS. KLEIN) Because they're in the same  
6 bullet, right?

7 A. They are.

8 Q. Okay. So let's go back up to that second from  
9 the top "whereas."

10 MS. KLEIN: Alexa, if you could scroll back  
11 up.

12 Q. (BY MS. KLEIN) So that second, you know,  
13 (Reading:) Criteria will assist the County in its  
14 efforts to comply with all applicable federal and state  
15 laws.

16 Why don't you think that criteria 9, which  
17 you have a common understanding of, would not help you  
18 to comply with federal law?

19 MR. RUSSO: Objection, asked and answered.

20 THE WITNESS: Number 9 would stand by  
21 itself. You wouldn't need this whereas of a non-binding  
22 resolution.

23 Q. (BY MS. KLEIN) Well, what is a whereas? No.  
24 I mean, you're -- you know, you've done a lot of these,  
25 right? What is a whereas?

1 A. No, I haven't done any of these. These are  
2 done by county legal or somebody else.

3 Q. What does whereas mean to you?

4 A. I think it's saying -- I don't know what  
5 whereas means. It means here.

6 Q. You know in these clauses they're setting --  
7 they're setting forth the reason to have the resolution  
8 in the first place, right?

9 A. I guess.

10 Q. So I'll ask you one more time. Do the  
11 redistricting criteria I just read, including that No.  
12 9, do you think they would assist the county in its  
13 efforts to comply with federal law?

14 MR. RUSSO: Objection, calls for  
15 speculation, asked and answered, and calls for a legal  
16 conclusion.

17 THE WITNESS: I don't know how putting a  
18 non-binding resolution does anything to help follow  
19 federal law.

20 Q. (BY MS. KLEIN) Is it your practice to  
21 disregard non-binding resolutions?

22 A. They're non-binding. I mean, we didn't even  
23 adopt this one.

24 Q. Is it your practice to disregard non-binding  
25 resolutions?

1 point proposed to be a non-binding resolution for the  
2 Commissioner's Court to vote on, correct?

3 A. But we don't execute on this. That would be  
4 the lawyer's job.

5 Q. But the lawyers aren't the ones that were going  
6 to decide whether to pass these criteria, right?

7 A. I doubt it.

8 Q. The commissioners are the only ones that get to  
9 vote on stuff like this, right?

10 A. Sure.

11 Q. And the lawyers are working at your direction,  
12 right?

13 A. Yes.

14 Q. So if you had passed this, wouldn't you have  
15 the expectation that the lawyers you retained to do  
16 redistricting would adhere by this even if it's a  
17 non-binding resolution?

18 MR. RUSSO: Objection, calls for  
19 speculation, incomplete hypothetical.

20 THE WITNESS: I assume they would have  
21 considered it.

22 Q. (BY MS. KLEIN) If they felt that they had to  
23 disagree with this, don't you think they would have told  
24 you to amend it?

25 MR. RUSSO: Let me caution the witness,

1 these criteria to your attorney to talk about it, right?

2 A. It appears that way, yes.

3 MS. KLEIN: And let's scroll down, if you  
4 don't mind, Alexa, to that correspondence. Next page,  
5 please, and then the next page.

6 Q. (BY MS. KLEIN) So this is PDF page -- I can't  
7 tell -- 6 of 11 on Exhibit 27. So this is an email from  
8 you to J. Nixon at 9:59 a.m., correct?

9 A. Yes.

10 Q. And J. Nixon was your lawyer at the time for  
11 redistricting, correct?

12 A. Correct.

13 Q. What's his full name again?

14 A. Joe.

15 Q. Joe, thank you. And you say, (Reading:) Joe,  
16 in 2001 Galveston County Commissioners Court adopted a  
17 resolution establishing the Court's criteria for  
18 redistricting. Attached is a copy of the proposed  
19 resolution for 2011. Do you see any issues? I'd like  
20 to have it on the agenda for Tuesday.

21 And then if we scroll down, we keep  
22 scrolling down, it's the same criteria, right?

23 MS. KLEIN: Keep scrolling, Alexa. Keep  
24 going and keep going.

25 Q. (BY MS. KLEIN) And Joe Nixon replies at

1 11:53 a.m., (Reading:) Judge Henry, I would like to  
2 discuss the resolution with you before the  
3 Commissioner's Court adopts it. Please call my cell at  
4 your convenience including evenings and weekends. Thank  
5 you.

6 After -- so you spoke with Joe about this,  
7 correct?

8 A. I would think so.

9 Q. And after that, you decided not to put the  
10 criteria on the agenda for the June 7th meeting,  
11 correct?

12 A. It appears that way.

13 Q. And it never got on any agenda for any meeting  
14 before the 2011 map was passed, correct?

15 A. Correct.

16 Q. Okay. Do you recall if Joe Nixon ever sent you  
17 back, you know, an edited version of the criteria that  
18 you should put on the agenda?

19 A. I do not remember.

20 Q. Is it fair to say assume he didn't because  
21 nothing ever was passed?

22 MR. RUSSO: Objection, calls for  
23 speculation.

24 THE WITNESS: Had he, I'm sure we would  
25 have produced so I'm guessing he didn't.

1 Q. (BY MS. KLEIN) But, you know, had he sent a  
2 markup, that would be the version you would pass in the  
3 end, right --

4 A. Probably.

5 Q. -- because you would have wanted to?

6 MR. RUSSO: Objection, calls for  
7 speculation.

8 MS. KLEIN: Sorry, Ms. Elkins.

9 Q. (BY MS. KLEIN) So -- because you had wanted to  
10 put something on the agenda?

11 A. No, that is not accurate. I am -- I was merely  
12 saying this is what they did in 2001. Is that what we  
13 do again this time? That does not mean I wanted to do  
14 that.

15 Q. Where do you say -- where do you say that in  
16 this email chain?

17 A. Where do I -- I don't say that I want this  
18 done. I say this is what they did in 2001.

19 Q. You said, (Reading:) I would like to have it  
20 on the agenda for Tuesday.

21 Right?

22 A. If it was required.

23 Q. But that's not in this email, right?

24 A. No.

25 Q. You're saying, I'd like to have it on the

1 agenda. Do you see any issues with that? Right?

2 A. Correct.

3 Q. All right. I don't have any further questions  
4 on that. Thank you. We can switch gears a little bit.

5 And we'll go -- zoom back forward to 2021.

6 And we got into this a little before the map drawing  
7 process. But the county posted two proposals on its  
8 county website on October 29, 2021; is that right?

9 A. That seems correct, yes.

10 Q. And this website posting was done at your  
11 direction, correct?

12 A. Yes.

13 Q. How -- so you decided what specifically would  
14 be included on the website; is that right?

15 A. It's typically what would be included as far as  
16 the draft maps.

17 Q. As far as the content of the website?

18 A. I don't recall if we had a separate website or  
19 if this was just part of our county website.

20 Q. Okay. Let's pull it up. This is Tab 60. It  
21 will be Exhibit 28.

22 (Exhibit No. 28 was marked.)

23 Q. (BY MS. KLEIN) Does this look familiar to you?

24 A. Yes. I just don't -- I think this was on our  
25 county website. I don't think we had a dedicated

## **EXHIBIT 6**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

HONORABLE TERRY PETTEWAY, \*  
et al., \*

Plaintiffs, \*

VS. \*

Case No. 3:22-cv-00057

GALVESTON COUNTY, et al., \*

Defendants. \*

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF  
JOSEPH GIUSTI  
JANUARY 6, 2023  
(Reported Remotely)

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF JOSEPH  
GIUSTI, produced as a witness at the instance of the  
United States and duly sworn, was taken via  
videoconference in the above-styled and numbered cause  
on the 6th day of January, 2023, from 9:23 a.m. to  
6:01 p.m., before Marsha Yarberry, Certified Shorthand  
Reporter in and for the State of Texas, reported by  
machine shorthand, in Galveston, Texas, pursuant to the  
Federal Rules of Civil Procedure.

1 Q. And that's something that they're --

2 MS. OLALDE: It's in the process, yes.

3 Q. (By Mr. Gear) So let's change subjects and  
4 talk about the 2021 redistricting process and what, if  
5 any, type of training you received. So let me start  
6 off by asking you what, if any, experience do you have  
7 with redistricting prior to the 2021 redistricting  
8 process.

9 A. None.

10 Q. So take me through the steps you took to  
11 prepare for the 2021 commissioners court redistricting  
12 cycle.

13 A. Basically in the hiring of the firm to do our  
14 redistricting I just, of course, voted for that, and  
15 that -- that was the majority of it, honestly, to allow  
16 them to do their job.

17 Q. So was any individual or group training  
18 provided to the commissioners court?

19 A. Not that I recall, no.

20 Q. Such as training on map software?

21 A. No.

22 Q. Were you provided with map software?

23 A. No.

24 Q. Did you have an occasion to review any  
25 materials related to the prior redistricting cycle,

1 such as the 2011-2012 cycle?

2 A. No, sir.

3 Q. Did you take time or did you have an occasion  
4 to review any materials related to previously adopted  
5 redistricting criteria?

6 A. No, sir.

7 Q. Were you aware that redistricting criteria had  
8 been previously adopted during prior commissioner court  
9 redistricting cycles?

10 A. Not -- no, not aware of it, I guess.

11 Q. And when you say you guess, what do you mean?

12 A. I don't know.

13 MR. GEAR: Zach, can we pull up  
14 Exhibit 1?

15 MS. OLALDE: Is that two copies, or is  
16 that one?

17 MR. GEAR: It's one copy. I'm sorry.

18 MS. OLALDE: No worries.

19 MR. GEAR: I only made three copies. Let  
20 me know when it pops up on your computer.

21 MS. OLALDE: Do you want me to change his  
22 view so that he sees it on his computer, or did you  
23 want -- because he's got the paper in front of him.

24 MR. GEAR: Sure. Whatever works best for  
25 you.

1 MS. OLALDE: Yeah. We figured we would  
2 use the digital exhibits when we had somebody who  
3 didn't have paper.

4 MR. GEAR: Okay.

5 Q. (By Mr. Gear) So let's identify this document  
6 for the record. Do you see the -- at the very top what  
7 the date of this document is?

8 A. Yes, sir.

9 Q. And can you read that for the record?

10 A. 7th day of May, 2011.

11 Q. And it's the -- it's from the commissioners  
12 court of Galveston County, Texas, and it was when it  
13 convened at a regularly scheduled meeting with the  
14 following members present: Mark Henry, Patrick Doyle,  
15 Kevin O'Brien, Stephen Holmes, Kenneth Clark, and  
16 Dwight Sullivan. Do you see that?

17 A. Yes, sir.

18 Q. And do you see how this document is titled?

19 A. Yes, sir.

20 Q. And how is it titled?

21 A. Galveston County Resolution Adopting Criteria  
22 For Use in Redistricting 2011 process.

23 Q. So I want to direct your attention to  
24 paragraph 3 in this document, which is defendant's --  
25 which has Defendants Bates stamp 00015167. Can you

1 read paragraph 3 for the record?

2 A. Make sure I'm on the right paragraph here.

3 "Whereas, it is the intent of the county to comply with  
4 the Voting Rights Act and with all other relevant law,  
5 including Shaw versus Reno jurisprudence and the  
6 consent judgment and election orders in Hoskin versus  
7 Hannah, et al."

8 Q. What do you personally know about the Voting  
9 Rights Act as it applies to redistricting for Galveston  
10 County?

11 A. Very little. Nothing, actually.

12 Q. What do you know about other relevant laws as  
13 they apply to the redistricting process for Galveston  
14 County?

15 MS. OLALDE: Objection to the form to the  
16 extent you're asking for any kind of a legal opinion.

17 Go ahead. You can answer.

18 (Reporter clarification)

19 Q. (By Mr. Gear) And I'm asking for your  
20 understanding of what laws you were -- you were  
21 attempting to comply with when going through the 2021  
22 redistricting process.

23 A. The Voting Rights Act, which I know nothing  
24 about, really, other than it's supposed to be fair and  
25 impartial I guess is the way I would answer that.

1 Q. And directing your attention to the next  
2 paragraph, can you read that for the record, please?

3 A. "Whereas, a set of established redistricting  
4 criteria will serve as a framework to guide the county  
5 in the consideration of redistricting plans; and."

6 Q. And so during the 2021 redistricting process,  
7 was there -- did you have an occasion to discuss a set  
8 of redistricting criteria with the other commissioners  
9 in the commissioner court?

10 A. What do you mean by the "criteria"?

11 Q. Do you understand what redistricting criteria  
12 is?

13 A. Yes, to some degree.

14 Q. So based on your understanding, what is  
15 redistricting criteria?

16 A. That the population parameters be met, that  
17 it's done without bias or anything else. Just you  
18 divvy up the county into four equal portions based on  
19 population.

20 Q. Would you agree that it's a framework to guide  
21 the county in the consideration of its redistricting  
22 plans?

23 MS. OLALDE: Objection; vague.

24 THE WITNESS: Yes.

25 Q. (By Mr. Gear) And turning the page to page 2,

1 which is Defendants 00015168, I would like you to take  
2 a look at No. 2 where it indicates "Communities of  
3 interest should be maintained in a single district,  
4 where possible, and attempts should be made to avoid  
5 splitting neighborhoods." During the 2021  
6 redistricting process, was that something that the  
7 commissioners court and you took into consideration?

8 A. May I read it?

9 Q. You can. I apologize.

10 A. Okay, sir. Can you reask?

11 Q. Sure. During the 2021 redistricting process,  
12 was communities -- maintaining communities of interest  
13 something that you and the commissioners court took  
14 into consideration during the process?

15 MS. OLALDE: Objection; compound.

16 Go ahead.

17 THE WITNESS: The -- no. And the reason  
18 I say no is that we hired a firm basically to do -- to  
19 keep things legal and aboveboard and the way they  
20 should be done. My main concern was just that, that it  
21 be done legally.

22 Q. (By Mr. Gear) Are you aware of any  
23 criteria -- redistricting criteria, excuse me, that was  
24 developed by the commissioners court for the 2021  
25 redistricting process?

1 A. Not that I recall.

2 Q. Did you discuss redistricting criteria with  
3 any of the other commissioners during the 2021  
4 redistricting process?

5 A. Yes, to some degree, I guess, during the  
6 meetings we had.

7 Q. And what meetings are you referring to?

8 A. We had a meeting I guess in September.

9 Q. And who was present during that meeting?

10 A. The first meeting would have been myself, Paul  
11 Ready, Mr. Oldham. I don't remember if he was in  
12 person or on Zoom. I think he was there in person. I  
13 don't remember. And that's all I recall.

14 Q. Yourself, Paul Ready, who is the county  
15 attorney?

16 A. Yes.

17 Q. And Mr. Oldham, who is the redistricting  
18 consultant?

19 A. Correct.

20 Q. And that was September. Do you remember the  
21 day?

22 A. I don't.

23 Q. And did you receive any materials during that  
24 meeting related to redistricting criteria?

25 MS. OLALDE: I'm going to object to any

## **EXHIBIT 7**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

HONORABLE TERRY PETTEWAY,\*  
ET AL., \*  
\*  
PLAINTIFFS, \*  
\* CASE NO. 3:22-CV-00057  
VS. \*  
\*  
GALVESTON COUNTY, ET AL.,\*  
\*  
DEFENDANTS. \*

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF  
DARRELL APFFEL  
JANUARY 5, 2023

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF DARRELL APFFEL, produced as a witness at the instance of the PLAINTIFF(S), and duly sworn, was taken in the above-styled and numbered cause on JANUARY 5, 2023, from 9:17 A.M. to 6:01 P.M., before AMY PRIGMORE, CSR, in and for the State of Texas, reported by stenographic means, at the offices of GREER HERZ & ADAMS, One Moody Plaza 18th Floor, Galveston, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

1 A. Not that I recall, no.

2 Q. Did you discuss the letter with the other  
3 commissioners?

4 A. No, not that I recall.

5 Q. Why not?

6 A. No reason. I mean, like I said, I was -- I  
7 believed that we -- we were doing -- we were taking  
8 care of business.

9 Q. Did you review the redistricting criteria  
10 that was recommended in this letter?

11 A. Not -- I mean, ish, yes. I see stuff like  
12 this coming from the League of Women Voters much  
13 like your lawsuit. It's your opinion of what  
14 should have been, versus what has to be.

15 Q. What do you understand -- what's your  
16 understanding of what has to be, with regards to  
17 redistricting?

18 A. That you take the census data, and you look  
19 at population and you equal the -- the precincts  
20 within a 5 percent of -- I think that it's not a  
21 margin of error -- differential, and you draw maps  
22 accordingly.

23 Q. Did the Commissioners Court adopt  
24 redistricting criteria?

25 A. I don't know what -- what that means.

1 Specifically -- no. I mean, I've told you  
2 everything we did. So, are you saying did we --  
3 did someone draft a redistricting criteria that we  
4 voted on? No.

5 Q. You mentioned a margin of 5 percent.

6 Where -- where do you get that knowledge  
7 from?

8 A. I don't -- I don't know. And maybe I'm  
9 incorrect. Maybe I'm incorrect. But that's what I  
10 seem to recall, was that there was a -- you had to  
11 get all of the precincts within 5 percent of one  
12 another, on numbers.

13 MS. VALL-LLOBERA: I would like to  
14 move on to Tab 1, to introduce Tab 1 as the next  
15 exhibit. So introducing Apffel Exhibit 16.

16 (Exhibit 16 is marked.)

17 Q. (BY MS. VALL-LLOBERA) This is May -- excuse  
18 me. This is a May 24, 2011, e-mail, from Roxann  
19 Lewis to Mark Henry, with the subject, resolution  
20 you needed typed.

21 Have I read that correctly?

22 A. I wasn't paying attention. What are -- or  
23 Galveston County resolution adopting criteria? Is  
24 that what you read? What did you read? Are you --

25 Q. So this is a May 24, 2011, e-mail, from

1 Roxann Lewis to Mark Henry, with the subject,  
2 resolution you needed typed.

3 A. Yes, you read that correct.

4 Q. The -- the next page shows a document  
5 titled, Galveston County Resolution Adopting  
6 Criteria for Use in Redistricting 2011 Process.  
7 And it's a -- it's a draft, it's about three pages  
8 long.

9 Do you see that?

10 A. I do.

11 Q. Had you seen this document before?

12 A. No.

13 Q. Take a moment to review this criteria, and  
14 the criteria itself begins on page 2.

15 (The witness peruses the document.)

16 A. Oh, it's 10 percent, not 5. So I was  
17 incorrect.

18 (The witness peruses the document.)

19 A. Okay.

20 Q. (BY MS. VALL-LLOBERA) So I want to turn  
21 your attention to Criteria 2, in Judge Henry's  
22 draft, that says that community -- quote,  
23 Communities of interest should be maintained in a  
24 single district where possible, and attempts should  
25 be made to avoid splitting neighborhoods, end

1 quote.

2 And there are some -- some elaboration on  
3 that afterwards.

4 Did I read that correctly?

5 A. Yes.

6 Q. And I want to turn your attention to  
7 Criteria 4: Although it is recognized that  
8 existing districts will have to be altered to  
9 reflect new population distribution, any  
10 redistricting plan should, to the extent possible,  
11 be based on existing districts.

12 Have I read that correctly?

13 A. You did.

14 Q. I want to turn your attention to Criteria  
15 No. 8.

16 Could you read that one out loud for the  
17 record?

18 A. The redistricting plan should be narrowly  
19 tailored to avoid retrogression in the position of  
20 racial minorities and language minorities, as  
21 defined in the Voting Rights Act, with respect to  
22 the effective exercise of the electoral franchise.

23 Q. Okay. And finally, if I could turn your  
24 attention to Criteria 9.

25 And could you read that one for the record?

1           A. The redistricting plan should not fragment a  
2 geographically compact minority community or pack  
3 minority voters in the presence of polarized voting  
4 so as to create liability under Section 2 of the  
5 Voting Rights Act.

6           Q. Thank you.

7                        Would you generally support Judge Henry's  
8 2011 draft redistricting criteria?

9           A. I don't -- when I read the -- the  
10 resolution, it looks exactly like what we did.  
11 The -- the exact ones you went over, 2 -- anyway,  
12 the four you just went over are the four we've  
13 discussed by way of vocabulary terms that I told  
14 you I don't know what they mean. So...

15           Q. So you did -- but you did -- excuse me.

16                        You did discuss these topics and factor in  
17 this -- this criteria in your redistricting process  
18 for 2021?

19           A. Well, is that a question? Because you --  
20 you've asked me those questions specifically about  
21 all of this for three-and-a-half hours. So I don't  
22 know the -- I stand on everything I've told you,  
23 with regard to those things.

24                        So, is this a new question? Because I don't  
25 know what -- I'm...

1 Q. I believe earlier, you -- let me rephrase.  
2 Here's a written document listing out some  
3 factors, which I have been referring to as  
4 redistricting criteria.

5 A. Uh-huh.

6 Q. Did the -- did you have any kind of guiding  
7 documents like this, during the 2021 redistricting  
8 process?

9 A. And the answer was no, we -- that I know of,  
10 we didn't adopt -- this is what I would have  
11 envisioned, when I gave you my answer about, we --  
12 the court didn't adopt anything. Excuse me.

13 And this says this was for use in the 2011  
14 process. So I don't know of one for...

15 Q. Okay. Would you agree that -- excuse me.  
16 But it would be fair to say that -- excuse  
17 me.

18 I would like to return to the previous  
19 exhibit, which is the League of Women Voters  
20 letter, in Exhibit 15, right? Oh, Exhibit 15.

21 So this letter also contained a proposed  
22 timeline, and I would like to turn your attention  
23 to page 3 of the exhibit.

24 Did you review this timeline, when the  
25 League -- Ms. Swanson sent this?

1           A. I mean, I'm familiar with it, yes. But I  
2 see this as her opinion as to what we should do.

3           Q. How does this timeline compare to what  
4 actually occurred in the 2021 redistricting  
5 process? I -- I should be more specific.

6                     She sent this e-mail on October 29, 2021.  
7 At this point in time, when you received this  
8 letter, how did this timeline compare to what had  
9 occurred, to date, in the 2021 redistricting  
10 process?

11           A. Everything had happened, except the  
12 receive -- receiving of the proposed maps and the  
13 publication to the public, on October 29th, I  
14 think -- or no, I don't remember.

15                     Somewhere right in here is when the maps  
16 were posted on the county's website for comment, of  
17 which we got 534, by the way. That's -- that's  
18 bigger than any public meeting you said we had in  
19 2011.

20           Q. Could you state that again?

21           A. To which we got 534 comments to the maps.

22           Q. Through the public comments portal?

23           A. Yes. Yeah.

24           Q. Great. Okay.

25                     So earlier, when we were referring to -- to

## **EXHIBIT 8**

DEC-19-2011 16:18

VOTING SECTION

202 307 2569

P.02/04



U.S. DEPARTMENT OF JUSTICE

Civil Rights Division

TCH:RSB:RPL:BJW:maf  
DJ 166-012-3  
2011-4317  
2011-4374

Voting Section - NWB  
930 Pennsylvania Avenue, NW  
Washington, DC 20530

DEC 19 2011

James E. Trainor III, Esq.  
Beirne, Maynard & Parsons  
401 West 15th Street, Suite 845  
Austin, Texas 78701

Dear Mr. Trainor:

This refers to the 2011 redistricting plan for the commissioners court, the reduction in the number of justices of the peace from nine to five and the number of constables from eight to five, and the 2011 redistricting plan for the justices of the peace/constable precincts for Galveston County, Texas, submitted to the Attorney General pursuant to Section 5 of the Voting Rights Act of 1965, 42 U.S.C. 1973c. We received your submissions on October 18 and 20, 2011; additional information was received on December 5, 2011.

Our analysis indicates that the information sent is insufficient to enable us to determine that the proposed changes have neither the purpose nor will have the effect of denying or abridging the right to vote on account of race, color, or membership in a language minority group, as required under Section 5. The following information is necessary so that we may complete our review of your submission:

1. A detailed chronology of the county's adoption of the 2011 plans for its commissioners court and the justices of peace/constable precincts, including:
  - a. whether the county adopted or utilized any criteria, policies, or procedures to develop the proposed plans and any alternative plans prepared by or for county officials, and if so, a copy of any such standards and the extent to which they were publicized;
  - b. if the county chose not to adopt or utilized criteria, policies, or procedures as part of the redistricting process, the basis for that decision;
  - c. regardless of whether the county adopted any standards as defined above, any instructions or directions given to the demographer/consultant regarding the development of the proposed plans and any alternative plans;
  - d. a description of all communication between any county official and the demographer/ consultant;

DEC-19-2011 16:18

VOTING SECTION

202 307 2569 P.03/04

- 2 -

e. copies of all alternative plans, whether formal or informal proposals, including maps depicting the boundary lines of the precincts as well as total and voting age population data by race and by voting precinct that were presented to or considered by the county; and

f. for each plan identified in item (e) above, set forth the factual basis for the county's determination that the adopted plans better satisfy the county's redistricting criteria; or

g. if the county did not adopt any redistricting criteria, the factual basis for the county's decision to adopt the proposed plan as opposed to any plan identified in item (e) above.

2. To the extent not previously provided, copies of the following:

a. all documents relating to the proposed and alternative plans, including notes, summaries, minutes, tapes, and transcripts of all discussions, meetings and hearings, whether formal or informal, at which the proposed or alternative plans were discussed;

b. copies of all newspaper articles, legal notices, editorials, letters to the editor, advertisements, and any publicity related to the proposed plans;

c. any correspondence among the elected officials, employees, demographer, consultant, or member of the public that addressed the proposed or alternative plans; and

d. all documents, studies, analyses, reports, articles, or other materials presented to, considered by, or relied upon, by the county in adopting the proposed plans

3. To the extent not already provided, election returns, by voting precinct and district, for all state, county, school district, and municipal elections conducted in Galveston County, in which a minority candidate has participated, from 2002 to present, including primary and general elections. For each election, please indicate the following:

a. the office/position sought;

b. each candidate's name and race/ethnicity, and identify the incumbent, if any, and whether the incumbent was elected or appointed;

c. the number of votes each candidate received by voting precinct and district;

d. the number of registered voters by race/ethnicity, voting precinct and district who participated in the election; and

DEC-19-2011 16:18

VOTING SECTION

202 307 2569 P.04/04

- 3 -

e. a map of the current voting precincts.

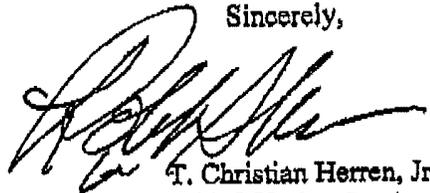
If exact numbers are not available for your responses to items c-d above, please provide your best estimate and the basis for that estimate. If available, please provide the data in electronic format (.dbf, .xls, or .txt files).

4. With regard to the proposed plans, the factual basis for the county's determination that neither plan will not have a retrogressive effect on minority voting strength.

The Attorney General has sixty days to consider a completed submission pursuant to Section 5. This sixty-day review period will begin when we receive the information specified above. Procedures for the Administration of Section 5 of the Voting Rights Act of 1965, 28 C.F.R. 51.37. However, if no response is received within sixty days of this request, the Attorney General may object to the proposed changes consistent with the burden of proof placed upon the submitting authority. 28 C.F.R. 51.40 and 51.52(a) and (c). Changes that affect voting are legally unenforceable unless and until the appropriate Section 5 determination has been obtained. *Clark v. Roemer*, 500 U.S. 646 (1991); 28 C.F.R. 51.10. Therefore, please inform us of the action the county plans to take to comply with this request.

If you have any questions concerning this letter or if we can assist you in obtaining the requested information, please call Brittany Wake (202-305-0014) of our staff. Refer to File Nos. 2011-4317 and 2011-4374 in any response to this letter so that your correspondence will be channeled properly.

Sincerely,



T. Christian Herren, Jr.  
Chief, Voting Section

**EXHIBIT 9**

# MAP 2

The following are the Galveston precincts listed by district or, in the event of a split, listed by precinct and then by block.

## District 1:

Whole Precincts:

- 481671651
- 481670169
- 481670168
- 481670193
- 481670172
- 481670197
- 481670152
- 481670142
- 481670144
- 481670150
- 481670347
- 481670165
- 481670167
- 481670146
- 481670166
- 481670148
- 481670159
- 481670151
- 481670343

Split precincts with corresponding blocks residing in District 1:

- 481670170
  - 481677212062003
  - 481677212062000
- 481670490

- 481677212061011
- 481677212061010
- 481677212061009
- 481677212061008
- 481677212061007
- 481677212061005
- 481677212061004
- 481677212061003
- 481677212061002
- 481677212061001
- 481677212061000
  
- 481670336
  - 481677226001037
  - 481677226001034
  - 481677226001033
  - 481677226001032
  - 481677226001031
  - 481677226001030
  - 481677226001029
  - 481677226001028
  - 481677226001027
  - 481677226001025
  - 481677226001024
  - 481677226001023
  - 481677226001022
  - 481677226001021
  - 481677226001020
  - 481677226001019
  - 481677226001018
  - 481677226001017
  - 481677226001016
  - 481677226001015
  - 481677226001014
  - 481677226001013
  - 481677226001012
  - 481677226001011

- 481677226001010
- 481677226001009
- 481677226001008
- 481677226001007
- 481677226001006
- 481677226001005
- 481677226001004
- 481677226001003

## **District 2:**

Whole Precincts:

- 481670316B
- 481673061
- 481673301
- 481670309
- 481672323
- 481670105
- 481670274
- 481671051
- 481670275
- 481670277
- 481670278
- 481670224
- 481670223
- 481670276
- 481670227
- 481670225
- 481670226
- 481670104
- 481670221
- 481670345
- 481670316A
- 481670311
- 481670103

- 481670218
- 481670315
- 481670314
- 481670306

Split precincts with corresponding blocks residing in District 2:

- 481670219
  - 481677233005008
  
- 481670334
  - 481677237001002
  - 481677236002062
  
- 481672321
  - 481677238001064
  - 481677238001043
  - 481677238001027
  
- 481670258
  - 481677235052007
  - 481677235052006
  - 481677235052005
  - 481677235052004
  - 481677235043019
  - 481677235043018
  - 481677235043017
  - 481677235043012
  - 481677235043010
  - 481677235043009
  - 481677235043008
  - 481677235042029
  - 481677235042028
  - 481677235042026
  - 481677235042025
  - 481677235042024
  - 481677235042023

- 481677235042022
- 481677235042021
- 481677235042020
- 481677235042019
- 481677235042018
- 481677235042017
- 481677235042016
- 481677235042015
- 481677235042014
- 481677235042012
- 481677235042011
- 481677235042009
- 481677235042008
- 481677235042005
- 481677235042004
- 481677235032010
- 481677235032009
  
- 481670330
  - 481677262002076
  - 481677262002075
  - 481677262002074
  - 481677262002073
  - 481677262002072
  - 481677262002071
  - 481677262002070
  - 481677262002069
  - 481677262002068
  - 481677262002067
  - 481677262002066
  - 481677262002065
  - 481677262002064
  - 481677262002063
  - 481677262002062
  - 481677262002061
  - 481677262002060
  - 481677262002059
  - 481677262002058

○ 481670330 continued

- 481677262002057
- 481677262002056
- 481677262002055
- 481677262002054
- 481677262002053
- 481677262002052
- 481677262002051
- 481677262002050
- 481677262002049
- 481677262002048
- 481677262002047
- 481677262002046
- 481677262002045
- 481677262002044
- 481677262002043
- 481677262002042
- 481677262002041
- 481677262002040
- 481677262002039
- 481677262002038
- 481677262002037
- 481677262002036
- 481677262002035
- 481677262002034
- 481677262002033
- 481677262002032
- 481677262002031
- 481677262002030
- 481677262002029
- 481677262002028
- 481677262002027
- 481677262002026
- 481677262002025
- 481677262002024
- 481677262002023
- 481677262002022
- 481677262002021
- 481677262002020
- 481677262002019

○ 481670330 continued

- 481677262002018
- 481677262002017
- 481677262002016
- 481677262002015
- 481677262002014
- 481677262002013
- 481677262002012
- 481677262002011
- 481677262002010
- 481677262002009
- 481677262002008
- 481677262002007
- 481677262002006
- 481677262002005
- 481677262002004
- 481677262002003
- 481677262002002
- 481677262002001
- 481677262002000
- 481677238002048
- 481677238002009
- 481677238002006
- 481677238002005
- 481677238002004
- 481677238001060
- 481677238001045
- 481677238001024
- 481677238001023
- 481677238001022
- 481677238001021
- 481677238001020
- 481677238001019
- 481677238001018
- 481677238001017
- 481677238001016
- 481677238001015
- 481677238001014
- 481677238001013
- 481677238001012

○ 481670330 continued

- 481677238001011
- 481677238001010
- 481677238001009
- 481677238001008
- 481677238001007
- 481677238001006
- 481677238001005
- 481677238001004
- 481677238001003
- 481677238001002
- 481677238001001
- 481677238001000
- 481677228002039
- 481677228002038
- 481677228002037
- 481677228002036
- 481677228002035
- 481677228002034
- 481677228002033
- 481677228002032
- 481677228002031
- 481677228002030
- 481677228002029
- 481677228002028
- 481677228002027
- 481677228002026
- 481677228002025
- 481677228002024
- 481677228002023
- 481677228002022
- 481677228002021
- 481677228002020
- 481677228002019
- 481677228002018
- 481677228002017
- 481677228002016
- 481677228002015
- 481677228002014
- 481677228002013

○ 481670330 continued

- 481677228002012
- 481677228002011
- 481677228002010
- 481677228002009
- 481677228002008
- 481677228002007
- 481677228002006
- 481677228002005
- 481677228002004
- 481677228002003
- 481677228002002
- 481677228002001
- 481677228002000
- 481677228001035
- 481677228001033
- 481677228001032
- 481677228001031
- 481677228001030
- 481677228001027
- 481677228001026
- 481677228001025
- 481677228001024
- 481677228001021
- 481677228001020
- 481677228001019
- 481677228001018
- 481677228001017
- 481677228001016
- 481677228001015
- 481677228001014
- 481677228001013
- 481677228001012
- 481677228001011
- 481677228001010
- 481677228001009
- 481677228001008
- 481677228001007
- 481677228001006
- 481677228001005

- 481670330 continued
  - 481677228001004
  - 481677228001003
  - 481677228001002
  - 481677228001001
  - 481677228001000

## **District 3:**

Whole Precincts:

- 481670394
- 481670391
- 481670398
- 481670192
- 481670399
- 481670455
- 481670464
- 481670488
- 481670340
- 481670457
- 481670456
- 481670471
- 481670389
- 481670487
- 481670341
- 481670454
- 481670453

Split precincts with corresponding blocks residing in District 3:

- 481670170
  - 481677212073000
  - 481677212072014
  - 481677212072013
  - 481677212072012
  - 481677212072011
  - 481677212072010

- 481677212072009
- 481677212072008
- 481677212072007
- 481677212072006
- 481677212072005
- 481677212072004
- 481677212072003
- 481677212072002
- 481677212072001
- 481677212072000
- 481677212054009
- 481677212054008
- 481677212054007
- 481677212054006
- 481677212054005
- 481677212054004
- 481677212054003
- 481677212054002
- 481677212054001
- 481677212054000
- 481677212053010
- 481677212053009
- 481677212053008
- 481677212053007
- 481677212053006
- 481677212053002
- 481677212053001
- 481677212053000
- 481670490
  - 481677212063004
  - 481677212063003
  - 481677212063002
  - 481677212063001
  - 481677212063000
  - 481677212062011
  - 481677212062010
  - 481677212062009
  - 481677212053012
  - 481677212053011

- 481677212053005
- 481677212053004
- 481677212053003
- 481677212052006
- 481677212052005
- 481677212052004
- 481677212052003
- 481677212052002
- 481677212052001
- 481677212052000
- 481677212051007
- 481677212051006
- 481677212051005
- 481677212051004
- 481677212051003
- 481677212051002
- 481677212051001
- 481677212051000
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- 481677212042001
- 481677212042000

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- 481677205053001
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- 481677205052008
- 481677205052007
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- 481677205051007
- 481677205051006
- 481677205051005
- 481677205051004
- 481677205051003
- 481677205051002
- 481677205051001
- 481677205051000

## District 4:

Whole Precincts:

- 481670401
- 481672801
- 481670281
- 481672322
- 481674391
- 481673311
- 481670312
- 481670280
- 481670301
- 481670482
- 481670232
- 481670331
- 481670461
- 481670283
- 481670462
- 481670228
- 481670279
- 481670338
- 481670220
- 481670460
- 481670439

Split precincts with corresponding blocks residing in District 4:

- 481670336
  - 481677227004013
  - 481677227004012
  - 481677227004011
  - 481677227004010
  - 481677227004009
  - 481677227004008
  - 481677227004007
  - 481677227004006

- 481677227004005
- 481677227004004
- 481677227004003
- 481677227004002
- 481677227004001
- 481677227004000
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- 481677227003014
- 481677227003013
- 481677227003012
- 481677227003011
- 481677227003010
- 481677227003009
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- 481677227003006
- 481677227003005
- 481677227003004
- 481677227003003
- 481677227003002
- 481677227003001
- 481677227003000
- 481677227002016
- 481677227002015
- 481677227002014
- 481677227002013
- 481677227002012
- 481677227002011
- 481677227002010
- 481677227002009
- 481677227002008
- 481677227002007
- 481677227002006
- 481677227002005
- 481677227002004
- 481677227002003
- 481677227002002

- 481677227002001
- 481677227002000
- 481677227001015
- 481677227001014
- 481677227001013
- 481677227001012
- 481677227001011
- 481677227001010
- 481677227001009
- 481677227001006
- 481677227001005
- 481677227001004
- 481677227001002
- 481677227001001
- 481677227001000
- 481677226001026
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  - 481677233005007
  - 481677233005006
  - 481677233005005
  - 481677233005002
  - 481677233005001
  - 481677233005000
  - 481677233002044
  - 481677233002043
  - 481677233002042
  - 481677233002041
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  - 481677233002032
  - 481677233002031
  - 481677233002030

- 481677233002029
- 481677233002028
- 481677232002032
- 481677232002011
- 481677232002007
- 481677232002006
- 481677232002005
- 481677232002004
- 481677232002003
- 481677232002002
- 481677232002001
- 481677232002000
- 481677232001041
- 481677232001036
- 481677232001035
- 481677232001034
- 481677232001033
- 481677232001032
- 481677232001018
- 481677232001017
- 481677232001016
- 481677232001015
- 481677232001014
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- 481677232001011
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- 481677231001006
- 481677231001005
- 481677231001000
- 481677230003006

- 481677230003005
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  - 481677237003015
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  - 481677237001008
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  - 481677236002071
  - 481677236002069
  - 481677236002068
  - 481677236002067
  - 481677236002066
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  - 481677236002064
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- 481670258
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  - 481677235032008
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  - 481677229002018
  
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**EXHIBIT 10**

AGENDA

ITEM

#3

**GALVESTON COUNTY COMMISSIONERS COURT ORDER ESTABLISHING  
NEW COMMISSIONER PRECINCT BOUNDARIES**

On this the 22 day of March 2012, the Commissioners Court of Galveston County, Texas convened in a regularly scheduled meeting with the following members thereof present

Mark Henry, County Judge,  
Patrick Doyle, County Commissioner, Precinct No. 1,  
Kevin O'Brien, County Commissioner, Precinct No. 2,  
Stephen D. Holmes, County Commissioner, Precinct No. 3, and  
Kenneth Clark, County Commissioner, Precinct No. 4

When the following proceedings were had, to wit:

An Order approving a redistricting plan for Galveston County Commissioners Court Precincts (Districts)
--

**WHEREAS**, pursuant to the Constitution and Laws of the State of Texas, and other laws, the Galveston County Commissioners Court desires to divide the Commissioner Precinct Boundaries; and,

**WHEREAS**, the Galveston County Commissioners Court has determined that the interests of the people of the county are best served by changing the existing Commissioner Precinct Boundaries, and,

**NOW, THEREFORE, BE IT ORDERED BY THE COMMISSIONERS COURT OF GALVESTON COUNTY, TEXAS**, that Commissioners Precincts are hereby composed as depicted in the attached map, affixed hereto as "Exhibit A" and fully adopted and incorporated in this Order "Exhibit A" represents the map and statistics presented to the United States Department of Justice as Galveston v. U.S Settlement Offer #2 delivered to the Department of Justice this day. If there are any unassigned territories they are to be resolved in the manner as presented to the Department of Justice in the aforementioned settlement offer.

**BE IT FURTHER ORDERED**, Beirne, Maynard & Parsons, L L P shall forthwith submit this order and corresponding demographic data to the Voting Rights Division of the United States Department of Justice for preclearance. It is further ordered by the Court that this Redistricting Order shall take effect immediately.

Upon the Motion of County Judge Henry and Seconded by Commissioner O'Brien the above Redistricting Plan passed with 3 votes in favor thereof and 2 votes against.

Passed and approved this 22<sup>nd</sup> day of March 2012.

County of Galveston

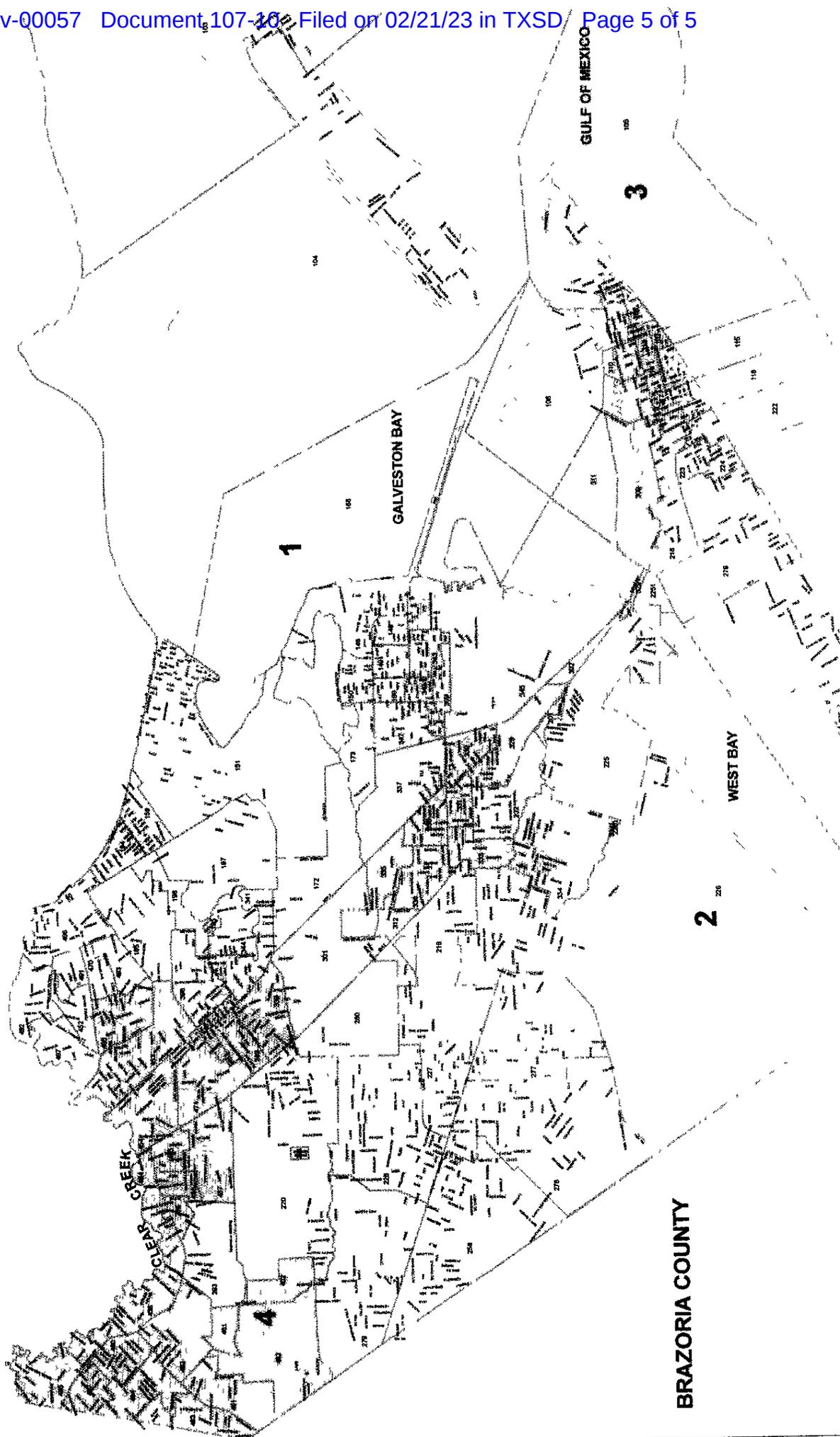


  
Mark Henry, County Judge

  
Dwight Sullivan  
County Clerk

# GALVESTON VS US SETTLEMENT OFFER #2

HARRIS COUNTY



BRAZORIA COUNTY

## **EXHIBIT 11**

On this the 11<sup>th</sup> day of February, 2013, the Commissioners' Court of Galveston County, Texas convened in a regularly scheduled meeting with the following members thereof present:

**Mark A. Henry, County Judge;**  
**Ryan L. Dennard, Commissioner, Precinct No. 1;**  
**Kevin D. O'Brien, Commissioner, Precinct No. 2;**  
**Stephen D. Holmes, Commissioner, Precinct No. 3;**  
**Kenneth Clark, Commissioner, Precinct No. 4; and**  
**Dwight D. Sullivan, County Clerk**

when the following proceedings, among others, were had, to wit:

<p style="text-align: center;"><b>An Order Establishing the Boundaries of Election Precinct Lines in Galveston County to be Effective January 1, 2014</b></p>
---

**Whereas**, V.T.C.A., Election Code §42.005 provides that Texas county election precincts, including consolidated precincts, may not contain territory from more than one of each of the following types of territorial units:

- 1) a commissioners precinct;
- 2) a justice precinct;
- 3) a congressional precinct;
- 4) a state representative district;
- 5) a state senatorial district;
- 6) a ward in a city with a population of 10,000 or more; or
- 7) a State Board of Education district; and

**Whereas**, during Galveston County's 2011 redistricting efforts on County Commissioner precinct lines, in order to address the following lawsuits, to-wit:

Civil Action No. 11-1837 styled Galveston County, Texas, Plaintiff, v. United States of America, et.al. Defendants filed in the United States District Court for the District of Columbia and

Civil Action No. G-11-511 styled The Honorable Terry Petteway, et. al. Plaintiffs, vs. the Honorable Mark Henry, et. al., Defendants filed in the United States District Court, Southern District of Texas, Galveston Division

and in order to obtain the following No Objection Letter on the following United States Department of Justice submission:

Submission No 2012-1597-Redistricting of Commissioners Precincts.  
 Submission dated October 14, 2011. Approved March 23, 2012,

the Commissioners' Court, assisted by United States District of Justice representatives, created 137 election precincts to be used in the November, 2012 General Election; but

**Whereas**, since the most recently adopted County Commissioner and House of Representatives District 23 and 24 boundary lines cross a number of election precincts in violation of V.T.C.A., Election Code §42.005 it is necessary to now establish a change in description in a number of the 137 election precincts; and

**Whereas**, since the population in Galveston County is, according to the 2010 federal Census, 291,309 under the provisions of the V.T.C.A. Election Code §42.006 each election precinct should contain at least 100 but no more than 5,000 registered voters; and

**Whereas**, a number of the 137 election precincts are not in compliance with Election Code V.T.C.S, §42.006; and

**Whereas**, in accordance with V.T.C.A., Election Code §42.001 in establishing the boundaries of the new election precincts, the Commissioners' Court attempted to make them compact and contiguous and fewer in number. In addition, the Court considered the availability of buildings to use as polling places so that a voter in each precinct will not have to travel more than 25 miles from the voter's residence to reach the polling place for the precinct. The Court also considered the difficulty of obtaining sufficient election workers to serve each election precinct and the cost of the equipment to serve all election precincts.

**It is Therefore Ordered by the Commissioners' Court of Galveston County, Texas that, pursuant to V.T.C.A., §42.031 and §42.033 effective January 1, 2014:**

**1) The following election precincts have no changes in their boundary lines:**

<b>Comm. Pct. 1</b>	<b>Comm. Pct. 2</b>	<b>Comm. Pct. 3</b>	<b>Comm. Pct. 4</b>
150	221	301	401
151	228	312	454
	258	398	455
	263		462
	274		464
	275		487
	276		
	277		
	278		
	279		

280

281

**2) The following elections precincts are created and/or renumbered:**

**County Commissioner, Pct. 1**

- a) 101 merged into 103
- b) 102 merged into 103
- c) 103 enlarged to include a portion of 104, 101 and 102
- d) 104 - portion of 104 merged into 103
- e) 105 and 106 merged into 306
- f) 105.01 merged into 105
- g) 106.01 merged into 105
- h) 107 and 108 were merged into 308
- i) 115 renumbered to 315
- j) 115.02 merged into 218
- k) 118 merged into 218
- l) 118.03 merged into 316
- m) 146 enlarged to include a portion of 345.01
- n) 148 enlarged to include 149
- o) 148.03 merged into 343
- p) 149 merged into 148
- q) 149.03 merged into 343
- r) 159 enlarged to include 194
- s) 165 changed to conform to the League City city limit line
- t) 168 - part of 168 was merged into 345
- u) 172 enlarged to include 173
- v) 173 merged into 172
- w) 194 merged into 159
- x) 195 merged into 144
- y) 196 merged into 165 and 197
- z) 196.03 merged into 394
- aa) 197 enlarged to include 196
- bb) 199 merged into 142
- cc) 199.03 merged into 343

**County Commissioner, Pct. 2**

- a) 201 merged into 225 and 232
- b) 216 merged into 223
- c) 216.03 split between 309 and 316

- d) 217 merged into 218
- e) 217.03 merged into 316
- f) 219 enlarged to include portions of 227/24, 338.02 and 333.02
- g) 219 N/V merged into 331
- h) 220 - portion of 220 became 283
- i) 222 split between 223 and 224
- j) 222.03 merged into 316
- k) 223 enlarged to include 216
- l) 223.03 merged into 316
- m) 224 enlarged to include 222
- n) 225 enlarged to include 225.1 and a portion of 201
- o) 226 enlarged to include 226.03 and 226.01
- p) 226.03 merged into 226
- q) 227 realign to accommodate state representative lines
- r) 232 enlarged to include a portion of 201
- s) 232.03 merged into 330, 331 and 334
- t) 286 merged into 488
- u) 225.1 merged into 225 (no population)
- v) 226.1 merged into 226 (no population)
- w) 219 merged into 331 (no population)

**County Commissioner, Pct. 3**

- a) 302 merged into 330
- b) 309 - portion of 309 merged into 311
- c) 310 merged into 311
- d) 310 N/V merged into 105
- e) 311 enlarged to include 310 and portion of 309
- f) 311 N/V merged into 105
- g) 313 merged into 314
- h) 314 enlarged to include 313
- i) 314.02 merged into 218
- j) 329 merged into 330
- k) 330 enlarged to include 329, 329.1 and 302
- l) 331 enlarged to include 333
- m) 333 merged into 331
- n) 333.02 merged into 219
- o) 334 enlarged to include 334.1 and 334.02
- p) 334.02 merged into 334
- q) 335 merged into 338
- r) 336 enlarged to include 337

- s) 337 merged into 336
- t) 337.01 merged into 169
- u) 338 enlarged to include 335
- v) 338.02 was merged into 219
- w) 339 renumbered to 439 and enlarged to include 339.1 and a portion of 389
- x) 339.03 merged into 389
- y) 340 – portion of 340 merged into 399
- z) 340.04 merged into 471
- aa) 341 enlarged to include 344.03
- bb) 341.01 merged into 144
- cc) 341.04 merged into 439
- dd) 342 merged into 347, 343
- ee) 342.01 merged into 142
- ff) 343 enlarged to include 199.03, 149.03, 148.03, a portion of 342, 369 and 345
- gg) 344 enlarged to include 341.01 and renumbered to 144
- hh) 344.03 merged into 341
- ii) 345 enlarged to include 168 N/V
- jj) 345.01 was merged into 146 and 148
- kk) 347 enlarged to include a portion of 342 and 369
- ll) 347.01 merged into 142
- mm) 369 was split between 343 and 347
- nn) 389 – portion of 389 merged into 439
- oo) 389.03 renumbered to 389
- pp) 398.01 merged into 192
- qq) 398.04 merged into 453
- rr) 329.1 merged into 330 (no population)
- ss) 334.1 merged into 334 (no population)
- tt) 339.1 merged into 439 (no population)
- uu) 310 merged into 105 (no population)
- vv) 311 merged into 105 (no population)

**County Commissioner, Pct. 4**

- a) 402 merged into 482
- b) 452 renumbered to 152 and enlarged to include 491
- c) 453 enlarged to include 398.04
- d) 453.03 merged into 399
- e) 456 enlarged to include a portion of 485
- f) 457 lost a portion to 460 and gained a portion of 485
- g) 460 enlarged to include 484 and a portion of 457
- h) 461 enlarged to include 483

- i) 466 renumbered to 166
- j) 467 renumbered to 167 and enlarged to include 492
- k) 470 renumbered to 170
- l) 471 enlarged to include 340.04
- m) 471.03 merged into 399
- n) 482 enlarged to include 402
- o) 483 merged into 461
- p) 484 merged into 460
- q) 485 split between 457 and 456
- r) 488 enlarged to include 286
- s) 490 enlarged to include 493.04
- t) 491 merged into 152
- u) 492 merged into 167
- v) 493 renumbered to 193
- w) 493.04 merged into 490
- x) 454 merged into 399 (no population)

**3) That the total number of Election Precincts is now 83.**

**4) That pursuant to V.T.C.A., Election Code 42.003 the new boundaries for the 83 election precincts shall be established and re-defined as follows:**

**See Attached Exhibit "A"**

**Be it Further Ordered** that pursuant to V.T.C.A., Election Code §42.034 a certified copy of this **Order** be delivered to the County's voter registrar not later than the seventh day after this date.

**Be it Further Ordered** that pursuant to V.T.C.A., Election Code §42.035 a brief description in general terms of the election precinct changes be published both in Spanish and in English in the Daily News, a newspaper of general circulation in Galveston County, once a week for three (3) consecutive weeks beginning the week of February 11, 2013.

**Be it Further Ordered** that also pursuant to V.T.C.A., Election Code §42.035 not later than the 20<sup>th</sup> day after the date of this Order that the County Clerk deliver to the Secretary of State a copy of the notice published.

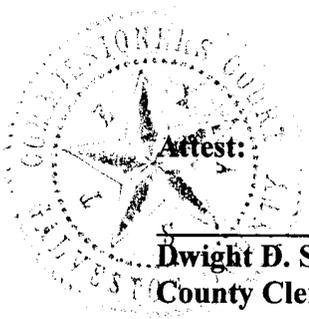
**Be it Further Ordered** that pursuant to V.T.C.A., Election Code §42.037 not later than the 120<sup>th</sup> day after the date of this Order that the County Clerk deliver to the Secretary of State a map depicting the affected precincts boundaries as changed and showing the number of each precinct.

**Be it Further Ordered** that this Order will not take effect until the United States Department of Justice has either issued its No Objection Letter pursuant to Section 5 of the Voting Rights Act of 1965, 42 U.S.C. 1973c or a declaratory judgment action is filed by the County of Galveston in the United States District Court for the District of Columbia and final judgment is rendered.

**Upon Motion Duly Made and Seconded** the above **Order** was unanimously passed this 11<sup>th</sup> day of February, 2013.

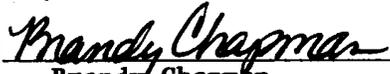
**County of Galveston**

By:   
**Mark A. Henry**  
**County Judge**



**Attest:**

\_\_\_\_\_  
**Dwight D. Sullivan**  
**County Clerk**

By:  Deputy  
**Brandy Chapman**

**Exhibit "A"**  
**Voting Precinct Boundaries Descriptions**

Depts\Commct\Redistri\Voting Precinct Changes and Realignment 2013

Voting Precincts "DRAFT"

Voting_Pre		
103	347	
104	389	
105	394	
142	391	
144	398	
146	399	
148	401	
150	439	
151	453	
152	454	
159	455	
165	456	
166	457	
167	460	
168	461	
169	462	
170	464	
172	471	
192	482	
193	487	
197	488	
218	490	
219		
220	Total Precincts:	83
221		
223		
224		
225		
226		
227		
228		
232		
258		
263		
274		
275		
276		
277		
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315		
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343		
345		

**VOTING PRECINCT NO. 103**

**BEGINNING** at the intersection of the Galveston/Chambers County line and the intersection of SH 87;

**THENCE** southerly to the 3 marine league line and thence southwesterly along the 3 marine league line to the intersection of the projection of a line that is midway between Mr. G Street and Monkhouse Street;

**THENCE** northerly along the line midway between Mr. G Street and Monkhouse Street to the Galveston County line;

**THENCE** northeasterly along the Galveston County line and southerly along the Galveston/Chambers County line to the place of beginning.

**VOTING PRECINCT NO. 104**

BEGINNING at the intersection of the projection of a line midway between Mr. G Street and Monkhouse Street and the 3 marine league line;

THENCE southwesterly along the 3 marine league line to the intersection of the Houston Ship Channel;

THENCE northerly along the Houston Ship Channel to the intersection of the projection of FM 517;

THENCE along the projection of FM 517 to the San Leon shoreline;

THENCE along the San Leon shoreline and the Galveston/Chambers County line to the intersection of the line midway between Mr. G Street and Monkhouse St.;

THENCE southerly along the line midway between Mr. G Street and Monkhouse Street to the place of beginning.

**VOTING PRECINCT NO. 105**

BEGINNING at the intersection of Albacore Ave to the centerline projection of Marine;  
THENCE southerly on Marine to the centerline intersection of Dolphin Ave;  
THENCE easterly on Dolphin Ave to the centerline projection of Ferry Road;  
THENCE northerly on Ferry Road North to the census block;  
THENCE southerly on the census block to the intersection of Seawall Blvd;  
THENCE easterly on Seawall Blvd to the centerline intersection of Boddeker Road;  
THENCE southerly on Boddeker Road to the centerline projection of lagoon bridge;  
THENCE northeasterly from the lagoon bridge along the census block to the intersection of the inner bar channel;  
THENCE westerly along the inner bar channel to the Texas City Ship Channel;  
THENCE northwesterly along the Texas City Ship Channel to the centerline project of the Causeway Railroad bridge;  
THENCE southwesterly from the centerline projection of the Causeway Railroad bridge to a projection of the southerly tip of the Shoal Point shoreline.  
THENCE southeasterly from the Shoal Point shoreline projection to the intersection of Seawolf Parkway;  
THENCE southwesterly along Seawolf Parkway to the centerline projection of the Galveston Ship Channel;  
THENCE easterly down the Galveston Ship Channel to the projection of the intersection between Wharf and 37<sup>th</sup> Street to the northerly Galveston shoreline;  
THENCE follow the northerly Galveston shoreline to the census block;  
THENCE follow the census block to the westerly end of Barracuda Ave;  
THENCE easterly on Barracuda Ave to the projected centerline of North Holiday Drive;  
THENCE northerly on North Holiday Drive to the centerline intersection of Albacore Ave;  
THENCE easterly on Albacore Ave back to the point of beginning.

**VOTING PRECINCT NO. 142**

BEGINNING at the centerline intersection of 25<sup>th</sup> Ave and 23<sup>rd</sup> Street;  
THENCE westerly along 25<sup>th</sup> Ave to the centerline projection of 31<sup>st</sup> Street;  
THENCE southerly from the centerline projection of 31<sup>st</sup> Street to the centerline intersection of 14<sup>th</sup> Ave;  
THENCE easterly on 14<sup>th</sup> Ave to the intersection of 29<sup>th</sup> Street;  
THENCE southerly on 29<sup>th</sup> Street to the Palmer Hwy intersection;  
THENCE westerly on Palmer Hwy to the centerline intersection of 31<sup>st</sup> Street;  
THENCE southerly on 31<sup>st</sup> Street to the centerline of 2<sup>nd</sup> Ave;  
THENCE easterly on 2<sup>nd</sup> Ave to the intersection of 29<sup>th</sup> Street;  
THENCE southerly on 29<sup>th</sup> Street to the centerline intersection of Texas Ave;  
THENCE easterly on Texas Ave to the centerline intersection of 28<sup>th</sup> Street;  
THENCE northerly on 28<sup>th</sup> Street to the centerline intersection of 2<sup>nd</sup> Ave;  
THENCE easterly on 2<sup>nd</sup> Ave to the centerline intersection of 25<sup>th</sup> Street;  
THENCE northerly on 25<sup>th</sup> Street to the centerline intersection of 3<sup>rd</sup> Ave;  
THENCE westerly on 3<sup>rd</sup> Ave to the centerline intersection of 27<sup>th</sup> Street;  
THENCE northerly on 27<sup>th</sup> Street to the centerline intersection of 6th Ave;  
THENCE easterly on 6<sup>th</sup> Ave to the centerline intersection of 26<sup>th</sup> Street;  
THENCE northerly on 26<sup>th</sup> Street to the centerline of 7<sup>th</sup> Ave;  
THENCE easterly on 7<sup>th</sup> Ave to the intersection of 25<sup>th</sup> Street;  
THENCE northerly on 25<sup>th</sup> Street to the centerline intersection of 12<sup>th</sup> Ave;  
THENCE easterly on 12<sup>th</sup> Ave to the intersection of 23<sup>rd</sup> Street;  
THENCE northerly on 23<sup>rd</sup> back to the point of beginning.

**VOTING PRECINCT NO. 144**

BEGINNING at the centerline intersection of FM 517 and California Ave;  
THENCE westerly on FM 517 to the centerline intersection of Texas Ave;  
THENCE southerly on Texas Ave to the intersection of Park Ave;  
THENCE southeasterly on Park Ave to the centerline of Dickinson Bayou;  
THENCE westerly on the centerline of Dickinson Bayou to the intersection of the railroad;  
THENCE southerly on the railroad to the Dickinson city limit line;  
THENCE easterly along the Dickinson city limit line to the Texas City city limit line;  
THENCE northerly along the Texas City city limit line to the centerline of Gum Bayou;  
THENCE northerly along the centerline of Gum Bayou to the League City city limit line;  
THENCE following the Dickinson city limit line to Owen Street;  
THENCE southerly on Owen Street to the centerline intersection of Melvin Utley Drive;  
THENCE westerly on Melvin Utley Drive to the intersection of Baker Drive;  
THENCE northerly on Baker Drive to the centerline intersection of 34<sup>th</sup> Street;  
THENCE westerly on 34<sup>th</sup> Street to the centerline intersection of California Ave;  
THENCE southerly on California Ave to the point of beginning.

**VOTING PRECINCT NO. 146**

BEGINNING at the centerline intersection of 9<sup>th</sup> Avenue North (Palmer) and Loop 197 (6<sup>th</sup> Street);

THENCE northerly and westerly along the centerline of Loop 197 to the centerline intersection a Texas City drainage channel;

THENCE northerly and northeasterly along the centerline of the Texas City drainage channel to the shoreline of Dollar Bay;

THENCE easterly following the meanders of the shoreline of Dollar Bay and Moses Lake to the Moses Lake Tide Gate south side;

THENCE southerly following the meanders of the shoreline of Galveston Bay to include the entire Texas City Dike to the easterly projected centerline of 4<sup>th</sup> Avenue North;

THENCE westerly along the centerline projection of 4<sup>th</sup> Avenue North to the centerline intersection of Skyline Drive (Texas City Seawall Levee);

THENCE northerly along the centerline of Skyline Drive to the centerline intersection of 8<sup>th</sup> Avenue North;

THENCE westerly along the centerline of 8<sup>th</sup> Avenue North to the centerline intersection of Bay Street;

THENCE northerly along the centerline of Bay Street to the centerline intersection of 9<sup>th</sup> Avenue North (Palmer);

THENCE westerly along the centerline of 9<sup>th</sup> Avenue North (Palmer) to the centerline intersection of 1<sup>st</sup> Street;

THENCE southerly on 1<sup>st</sup> Street to the centerline intersection of 8<sup>th</sup> Ave;

THENCE westerly on 8<sup>th</sup> Ave to the centerline intersection of 6<sup>th</sup> Street;

THENCE northerly on 6<sup>th</sup> Street back to point of beginning.

**VOTING PRECINCT NO. 148**

BEGINNING at the centerline intersection of 25<sup>th</sup> Ave and 23<sup>rd</sup> Street;  
THENCE southerly on 23<sup>rd</sup> Street to the intersection of the census block;  
THENCE easterly on census block to the intersection of 21<sup>st</sup> Street;  
THENCE northerly on 21<sup>st</sup> Street to the centerline intersection of 13<sup>th</sup> Ave;  
THENCE easterly on 13<sup>th</sup> Ave to the intersection of the census block;  
THENCE southerly on the census block to the intersection of 9<sup>th</sup> Ave;  
THENCE easterly on 9<sup>th</sup> Ave to the intersection of the census block;  
THENCE follow the census block to the centerline intersection of 11<sup>th</sup> Ave;  
THENCE easterly on 11<sup>th</sup> Ave to the centerline intersection of 9<sup>th</sup> Street;  
THENCE southerly on 9<sup>th</sup> Street to the centerline intersection of 8<sup>th</sup> Ave;  
THENCE southerly on 8<sup>th</sup> Avenue to the intersection of the census block;  
THENCE follow the census block to the intersection of 10<sup>th</sup> Street;  
THENCE southerly on 10<sup>th</sup> Street to the intersection of the census block;  
THENCE easterly on the census block to the intersection of 8<sup>th</sup> Street;  
THENCE northerly on 8<sup>th</sup> Street to the intersection of the census block;  
THENCE easterly on census block to 7<sup>th</sup> Street;  
THENCE southerly on 7<sup>th</sup> Street to the centerline intersection of 8<sup>th</sup> Ave;  
THENCE easterly on 8<sup>th</sup> Ave to the centerline intersection of 6<sup>th</sup> Street;  
THENCE northerly on 6<sup>th</sup> Street to Loop 197;  
THENCE northeasterly on Loop 197 to the centerline intersection of 25<sup>th</sup> Ave;  
THENCE westerly on 25<sup>th</sup> Ave back to the place of beginning.

**VOTING PRECINCT NO. 150**

BEGINNING at the centerline intersection of 29<sup>th</sup> Street and Loop 197 (25<sup>th</sup> Avenue North);

THENCE easterly along the centerline of Loop 197 (25<sup>th</sup> Avenue) to the centerline intersection of a Texas City drainage channel;

THENCE easterly along the centerline of the Texas City drainage channel to the shoreline of Dollar Bay;

THENCE westerly along the shoreline of Dollar Bay and Moses Lake to the northerly projected centerline of 29<sup>th</sup> Street;

THENCE south along the projected centerline and centerline of 29<sup>th</sup> Street to the centerline intersection of Loop 197 (25<sup>th</sup> Avenue North), the place of beginning.

**VOTING PRECINCT NO. 151**

BEGINNING at the centerline intersection of Moses Bayou and State Highway No. 146;

THENCE northeasterly along the centerline of Moses Bayou to its intersection with Moses Lake shoreline projection across the mouth of Moses Bayou;

THENCE northeasterly along the northwest shoreline of Moses Lake to the northwesterly side of Moses Lake Tide Gate;

THENCE northwesterly along the shoreline of Dickinson Bay to the centerline intersection of Dickinson Bayou;

THENCE northeasterly along the shoreline of Dickinson Bay to April Fool Point;

THENCE northeasterly along the shoreline of San Leon to Eagle Point;

THENCE northwesterly along the shoreline of Galveston Bay to the intersection of the northern most city limit line of Texas City;

THENCE westerly along the northern most Texas City city limits line to the centerline intersection of State Hwy 146;

THENCE southerly along the centerline of State Hwy 146 to the centerline intersection of Dickinson Bayou;

THENCE westerly along the centerline of Dickinson Bayou to the centerline intersection of the easterly projection of Humble Camp Road;

THENCE westerly along the easterly centerline projection of Humble Camp Road to the centerline of Humble Camp Road;

THENCE south along the centerline of Humble Camp Road to the centerline intersection of Attwater Avenue;

THENCE easterly along the centerline of Attwater Avenue to the centerline intersection of SH 146;

THENCE southwestly along the centerline of SH 146 to the centerline intersection of Moses Bayou, same being the place of beginning.

**VOTING PRECINCT NO. 152**

BEGINNING at the centerline intersection of FM 518 and FM 2094;

THENCE easterly along the centerline of FM 518 to the centerline intersection of Lawrence Road;

THENCE northwesterly along the centerline of Lawrence Road to the centerline intersection of FM 2094;

THENCE westerly along the centerline of FM 2094 to the centerline intersection of the HL&P cooling water canal;

THENCE southwesterly along the centerline of the HL&P cooling water canal to the centerline intersection of FM 2094;

THENCE southwesterly along the centerline of FM 2094 to the intersection of a westerly projection of the northern property line of League City Intermediate School;

THENCE easterly along said projection and along said northern property line of League City Intermediate School;

THENCE southerly along said north/south centerline to the intersection of the east/west centerline intersection of FM 2094;

THENCE southwesterly along the centerline of FM 2094 to the centerline intersection of FM 518, same being the place of beginning.

**VOTING PRECINCT NO. 159**

**BEGINNING** at the centerline intersection of SH 146 and Bay Street;

**THENCE** northeasterly along the centerline of Bay Street to the intersection of Galveston Bay shoreline;

**THENCE** southeasterly along the Galveston Bay shoreline to the Texas City city limits line;

**THENCE** southwesterly along the Texas City city limits line and it's southwesterly projection to the centerline of SH 146;

**THENCE** northwesterly along the centerline of SH 146 to the centerline intersection of Bay Street and place of beginning:

**VOTING PRECINCT NO. 165**

BEGINNING at the centerline intersections of FM 646 and FM 1266;

THENCE northerly along the centerline of FM 1266 to the centerline intersection of SH 96;

THENCE northeasterly along the centerline of SH 96 to the centerline intersection of SH 146;

THENCE southeasterly along the centerline of SH 146 to the centerline intersection of Miles Road;

THENCE southwesterly along a projection of the centerline of Miles Road to the centerline intersection of the Southern Pacific Railroad;

THENCE southeasterly along the centerline to the Southern Pacific Railroad to the League City city limits line;

THENCE southwesterly along the League City city limits line to the centerline of Caroline Street;

THENCE northerly along the centerline of Caroline Street to the centerline intersection of FM 646;

THENCE westerly along the centerline of FM 646 to the centerline intersection of FM 1266, the place of beginning;

**VOTING PRECINCT NO. 166**

BEGINNING at the centerline intersections of Lawrence Road and League City Parkway;

THENCE northeasterly along the centerline of League City Parkway to the centerline intersection of SH 146;

THENCE southeasterly along the centerline of SH 146 to the centerline intersection of Bay Street;

THENCE northeasterly along the centerline of Bay Street to the intersection at the Galveston Bay shoreline;

THENCE northwesterly along the Galveston Bay shoreline to its intersection at the Galveston/Harris County line;

THENCE westerly along the Galveston/Harris County line to its intersection with the League City city limits line;

THENCE southwesterly, southerly along the League City city limit line to the centerline intersection of FM 2094;

THENCE easterly along the centerline of FM 2094 to the centerline intersection of Lawrence Road;

THENCE southerly along the centerline of Lawrence Road to its centerline intersection with League City Parkway, same being the place of beginning.

**VOTING PRECINCT NO. 167**

BEGINNING at the intersection of the centerline of FM 270 and the Galveston/Harris County line;

THENCE southerly along the centerline of FM 270 to the centerline intersection of FM 2094;

THENCE northeasterly along the centerline of FM 2094 to its intersection with a westerly projection of the east/west centerline of League City Intermediate School;

THENCE easterly along said projection and along the east/west centerline of League City Intermediated School to its intersection with the north/south centerline of League City Intermediate School;

THENCE northerly along the north/south centerline of League City Intermediate School to its intersection with the northern property line of League City Intermediate School;

THENCE westerly along the northern property line of League City Intermediate School and a westerly projection thereof to its intersection with the centerline of FM 2094;

THENCE northeasterly along the centerline of FM 2094 to the centerline intersection of the HL&P cooling water canal;

THENCE easterly and northeasterly along the centerline of the HL&P cooling water canal to its intersection with the centerline of FM 2094;

THENCE easterly along the centerline of FM 2094 to its intersection with the League City city limits line;

THENCE northerly, northwesterly, northeasterly along the League City city limits line to its intersection with Galveston/Harris County line (centerline of Clear Creek);

THENCE northwesterly, westerly, southwesterly along the Galveston/Harris County line (centerline of Clear Creek) to its intersection with the centerline of FM 270, same being the place of beginning.

**VOTING PRECINCT NO. 168**

BEGINNING at the intersection of the Texas City city limit line at or approximately at the easterly projection of FM 517 and the San Leon shoreline;

THENCE southeasterly along the Texas City city limit line and a southeasterly projection of said line to its intersection with the centerline of the Houston Ship Channel;

THENCE southerly along the Houston Ship Channel to the centerline intersection of the Gulf Intercoastal Waterway;

THENCE westerly along the GIWW to the intersection of the Texas City Ship Channel;

THENCE northwesterly along the Texas City Ship Channel to USED sta 20+000;

THENCE southwestery along a line that runs from USED sta 20+000 to the centerline intersection of the Galveston Causeway and the GIWW to the intersection of a line which runs from the centerline intersection of the Pelican Island Bridge and Pelican Island shoreline to the southeasterly corner of the Texas City Pump Station Discharge Canal (northeasterly corner of Swan Lake);

THENCE northeasterly along said line that runs from the Pelican Island Bridge to Texas City Pump Station Discharge Canal to the southeast corner of the Texas City Pump Station Discharge Canal (also NE corner of Swan Lake);

THENCE northeasterly following the meanders of the shoreline around Shoal Point to the intersection of the census block line;

THENCE northwesterly along the census block line to the Texas City shoreline;

THENCE northerly along the Texas City shoreline and southeasterly along the southerly Texas City Dike shoreline turning northeasterly around the Texas City Dike shoreline then continuing northwesterly along the northerly Texas City Dike shoreline to the Texas City shoreline;

THENCE proceeding northerly along the Texas City shoreline to Dollar Point;

THENCE northwesterly along the Texas City shoreline to the southeasterly side of the Moses Lake Tide Control Structure;

THENCE along the shoreline of Moses Lake to the northwesterly side of the Moses Lake Tide Control Structure;

THENCE northwesterly along the shoreline to the centerline intersection of Dickinson Bayou;

THENCE northerly and easterly along the shoreline of Dickinson Bay to April Fool Point;

THENCE northeasterly along the San Leon shoreline to the intersection of the Texas City city limit at or approximately at the easterly projection of FM 517, also the place of beginning.

**VOTING PRECINCT NO. 169**

BEGINNING at the centerline intersection of Hwy 3 and Emmett F. Lowry Expy;

THENCE northwesterly on Hwy 3 to the intersection of Moses Bayou;

THENCE easterly along Moses Bayou to the intersection of the census block

THENCE southerly then northerly along census block to the centerline intersection of 25<sup>th</sup> Ave;

THENCE easterly on 25<sup>th</sup> Ave to the intersection of Southern Pacific Railroad;

THENCE southerly on Southern Pacific Railroad to the centerline intersection of Emmett F. Lowry Expy;

THENCE westerly on Emmett F. Lowry Expy back to point of beginning.

VOTING PRECINCT NO. 170

BEGINNING at the centerline intersection of FM 518 and Meadow Parkway;

THENCE southerly along the centerline of Meadow Parkway and a southerly projection thereof to its intersection with the southerly boundary of Meadow Bend Subdivision;

THENCE easterly and northeasterly along the southerly boundary of Meadow Bend and South Shore Village subdivisions to its intersection with the centerline of South Shore Boulevard at a point between Tucker and Crimson;

THENCE easterly on a line parallel to Tucker to the centerline intersection of FM 1266;

THENCE northerly along the centerline of FM 1266 to the centerline intersection of Delesandri;

THENCE easterly along the centerline of Delesandri to the intersection of the League City city limits line

THENCE northwesterly along the League City City limits line to its intersection with the centerline of FM 518;

THENCE westerly along the centerline of FM 518 to the centerline intersection of Meadow Parkway, the same being the place of beginning.

**VOTING PRECINCT NO. 172**

BEGINNING at the centerline intersection of the Loop 197 and 29<sup>th</sup> Street;

THENCE northerly along the centerline of 29<sup>th</sup> Street to the intersection with with Moses Lake shoreline;

THENCE westerly and southerly along the Moses Lake shoreline to the centerline intersection with Moses Bayou;

THENCE southwesterly along the centerline of Moses Bayou to the centerline intersection of SH 146;

THENCE northerly along the centerline of SH 146 to the centerline intersection of Attwater Avenue;

THENCE westerly along the centerline of Attwater Avenue to the centerline intersection of Humble Camp Road;

THENCE northerly and westerly along the centerline of Humble Camp Road to southerly projection of the Texas City city limit line;

THENCE northerly along the southerly projection of the Texas City city limit line to the Texas City city limit line;

THENCE westerly along the Texas City city limit line to the intersection of SH3;

THENCE southerly along the centerline of SH 3 to the centerline intersection of Moses Bayou;

THENCE easterly along the centerline of Moses Bayou to the centerline intersection of a canal;

THENCE southeasterly along the centerline of the canal to the centerline intersection of Drainage District No. 2 Ditch 6B;

THENCE northeasterly along the centerline of Drainage District No. 2 Ditch 6B to the centerline intersection of 25<sup>th</sup> Ave. North;

THENCE easterly along 25<sup>th</sup> Ave. North and Loop 197 to the centerline intersection of 29<sup>th</sup> Street, same being the place of beginning.

**VOTING PRECINCT NO. 192**

BEGINNING at the intersection of the centerline of Caroline Street and FM 646;

THENCE westerly along FM 646 and FM 1266 and an abandoned 70' ROW to the centerline of Wyoming Street;

THENCE southerly along Wyoming Street to the centerline of 27<sup>th</sup> Street;

THENCE easterly along 27<sup>th</sup> Street to the centerline of FM 1266

THENCE southerly, easterly and westerly through Nicholstone subdivision as shown on the voting pct map to the centerline of California Ave;

THENCE northerly, westerly and easterly along California Ave and through Nicholstone subdivision as shown on the voting pct map and along 20<sup>th</sup> Street and Caroline Street to the place of beginning;

**VOTING PRECINCT NO. 193**

BEGINNING at the intersection of the centerline of Lawrence Road and SH 96;

THENCE northerly along the centerline of Lawrence Road to the centerline of Delesandri Road;

THENCE westerly along the westerly projection of Delesandri Road to the centerline of FM 1266;

THENCE southerly on FM 1266 to the intersection of the centerline of Tucker Street;

THENCE westerly along Tucker Street and a westerly and southwesterly projection of Tucker Street to the intersection of the projection of the centerline of Windhollow Circle Street;

THENCE southerly along the southerly projection of Windhollow Street to the centerline of Austin Street;

THENCE westerly along Austin Street to the centerline of the pipeline corridor;

THENCE southerly along the pipeline corridor to the centerline of SH 96;

THENCE easterly along the centerline of SH 96 to the place of beginning.

**VOTING PRECINCT NO. 197**

**BEGINNING** at the intersection of the centerline of FM 517 and SH 146;

**THENCE** northerly along SH 146 and northerly, westerly, southerly and easterly along the League City/Texas City city limit line and the City of Dickinson and Texas City streets and lines to the centerline of SH 146 as shown on the voting precinct map;

**THENCE** northerly along SH 146 to the place of beginning.

**VOTING PRECINCT NO. 218**

**BEGINNING** at the intersection of the centerline of Seawall Blvd and 59<sup>th</sup> Street;

**THENCE** northerly, easterly, westerly and southerly along the centerline of the City of Galveston Streets and lines between 57<sup>th</sup> and 41<sup>st</sup> and Seawall Blvd and Cedar Lawn as shown on the voting pct map to the intersection of the centerline of 45<sup>th</sup> St and Seawall Blvd;

**THENCE** southerly, westerly and easterly along the projection of the centerline of 45<sup>th</sup> Street to and along the 3 marine league line and centerline of the projection of 57<sup>t</sup> Street to the place of beginning.

**VOTING PRECINCT NO. 219**

BEGINNING at the centerline intersection of IH 45 and the La Marque city limit line;

THENCE southerly, easterly, and northerly along the La Marque city limit line to the intersection with census block line;

THENCE westerly and northwesterly along the census block line to the centerline intersection of Highland A canal;

THENCE southerly along the centerline of Highland A canal to the centerline intersection of Highland Bayou;

THENCE southeasterly along the centerline of Highland Bayou to its intersection with census block line;

THENCE southeasterly along the census block line to a point turning northerly following along the census block line to the intersection of the La Marque city limit line;

THENCE southeasterly and easterly along the La Marque city limit line to the centerline intersection of FM 2004;

THENCE southerly along the centerline of FM 2004 to the intersection of the La Marque city limit line;

THENCE easterly along the La Marque city limit line to the southerly centerline projection of Walker Road;

THENCE northerly along the southerly project of Walker Road onto the centerline of Walker Road to the centerline intersection of Prairie Street;

THENCE easterly along the centerline of Prairie Street to the centerline intersection of Newman Road;

THENCE northerly along the centerline of Newman Road to the intersection with census block line south of IH 45;

THENCE northwesterly, southeasterly along census block line crossing IH 45 back to the centerline intersection of Newman Road north of IH 45;

THENCE northerly along the centerline of Newman Road to the centerline intersection of Hoover Street;

THENCE easterly along the centerline of Hoover Street to the centerline intersection of Bernice Street;

THENCE northerly along the centerline of Bernice Street to the centerline intersection of FM 1765;

THENCE westerly along the centerline of FM 1765 to the centerline intersection of Amburn Road;

THENCE northerly along the centerline of Amburn Road to the centerline intersection of Jones Road;

THENCE westerly along the centerline of Jones Road to the centerline intersection of Lane Road;

**VOTING PRECINCT NO. 219**

THENCE southerly along the centerline of Lane Road and the southerly projection of Lane Road to the centerline intersection of Downey Cove;

THENCE easterly along the centerline of Downey Cove to the centerline intersection of East Road;

THENCE southerly along the centerline of East Road to the centerline intersection of FM 1765;

THENCE westerly along the centerline of FM 1765 to the centerline intersection of IH-45;

THENCE northwesterly along the centerline of IH-45 to the intersection with the La Marque city limit line, same being the place of beginning.

**VOTING PRECINCT NO. 220**

**BEGINNING** at the centerline intersection of FM 517 and census block line just west of Leisure Lane;

**THENCE** northerly and westerly along the census block line to the centerline of McFarland Road;

**THENCE** northerly along the centerline of McFarland Road to its centerline intersection of the American canal;

**THENCE** easterly along the centerline of the American canal and an extension thereof and the centerline of Ervin Road and an extension thereof to the centerline of IH-45;

**THENCE** southeasterly along the centerline of I-45 to the centerline intersection of FM 646;

**THENCE** southwesterly and southerly along the centerline of FM 646 to the intersection with the Dickinson city limit line;

**THENCE** westerly and northerly along the Dickinson city limit line to its centerline intersection of Dickinson Bayou;

**THENCE** westerly along the centerline of Dickinson Bayou to the centerline intersection of FM 517;

**THENCE** easterly along the centerline of FM 517 to its intersection with census block line just west of Leisure Lane, same being the place of beginning.

**VOTING PRECINCT NO. 221**

**BEGINNING** at a point that is always midway between the Mainland and Galveston Island and the extension of the 8 Mile Road in West Bay;

**THENCE** southwesterly and along said line which is always midway between the Mainland and Galveston Island to the intersection of the Brazoria-Galveston County line projected southeasterly;

**THENCE** northwesterly along the said projected County line to a point on the northerly shoreline of Galveston West Bay; The same being an angle point in the Brazoria-Galveston County Line;

**THENCE** southwesterly and along the Brazoria-Galveston County line to San Luis Pass;

**THENCE** southerly following the said Brazoria-Galveston County line through San Luis Pass;

**THENCE** southeasterly along a line that is perpendicular to the southeast shoreline of Galveston Island to the Three Marine League Line;

**THENCE** easterly along the Three Marine League Line to the point of intersection of the centerline of Pine Street projected southerly;

**THENCE** northerly and along the centerline of Pine Street projected southerly to the shoreline of Galveston Island;

**THENCE** westerly and along the shoreline of Galveston Island to the centerline intersection of the 8 Mile Road;

**THENCE** northerly and along the centerline of the 8 Mile Road and its northerly projection to the place of beginning.

**NOTE:** Excluded from this precinct is the area within the limits of the City of Jamaica Beach and the area within the limits of M.U.D. No. 1 in Pirates Beach.

**VOTING PRECINCT NO. 223**

BEGINNING at the intersection of the centerline of Stewart Road and Golf Crest Dune;

THENCE southerly, westerly, northerly and easterly along the centerline of the city of Galveston Streets and lines and through the Weis School building to the intersection of the centerline of the GIWW as shown on the voting pct map;

THENCE northerly, easterly, southerly and westerly along the GIWW and the centerline of the city of Galveston streets and line to the intersection of the centerline of Broadway and 59<sup>th</sup> Street;

THENCE easterly, southerly, westerly and northerly along the centerline of the city of Galveston Streets and lines to the point of beginning.

**VOTING PRECINCT NO. 224**

BEGINNING at the intersection of the centerline of 57<sup>th</sup> Street and Seawall Blvd;

THENCE northerly, westerly, southerly and easterly along the centerline of the streets and lines of the City of Galveston and thru the Weis school building to the intersection of the centerline of 81<sup>st</sup> Street and Seawall Blvd as shown on the voting pct map.

THENCE easterly along Seawall Blvd and southerly along the projection of the centerline of Pine Street as shown on the voting pct map;

THENCE southerly, easterly and northerly along the southern projection of Pine Street, the 3 marine league line and the projection of the centerline of 57<sup>th</sup> Street to the place of beginning.

**VOTING PRECINCT NO. 225**

**BEGINNING** at the centerline intersection of Harbor Drive and Hwy 6;

**THENCE** southeasterly on Hwy 6 to the intersection of the census block west of Western Drive;

**THENCE** northeasterly along census block to the intersection of Highland Bayou;

**THENCE** easterly then southerly along Highland Bayou to the centerline intersection of Hwy 6;

**THENCE** southeasterly on Hwy 6 to the centerline of IH-45 (Gulf Freeway);

**THENCE** southeasterly on IH-45 (Gulf Freeway) to the centerline intersection of the GIWW;

**THENCE** southwesterly on GIWW to the projection of Hana Drive;

**THENCE** northerly from projection of Hana Drive to the Tiki Island city limit line;

**THENCE** westerly along Tiki Island city limits to the shoreline of North Deer Island;

**THENCE** northerly along North Deer Island to a projection of Tamana;

**THENCE** northerly from projection of Tamana to the intersection of Tiki Island city limits;

**THENCE** easterly then northerly along Tiki Island city limits to the intersection of the census block;

**THENCE** northwesterly along census block to the intersection of the mainland shoreline;

**THENCE** southwesterly along the mainland shoreline to the intersection of the Highland Bayou Diversion Channel;

**THENCE** northwesterly along Highland Bayou Diversion Channel to the intersection of Harbor Drive;

**THENCE** northeasterly on Harbor Drive back to the point of beginning.

**VOTING PRECINCT NO. 226**

BEGINNING at the intersection of the south bank of Basford Bayou and centerline of Flamingo Road;

THENCE westerly along the south bank of Basford Bayou approximately 2900 feet;

THENCE northerly to the centerline of Basford Bayou;

THENCE westerly along the centerline of Basford Bayou and its westerly projection to the centerline intersection of Highland Bayou Diversion Channel;

THENCE northerly along the centerline of Highland Bayou Diversion Channel to the northwesterly projection of the centerline of North Redfish Drive;

THENCE southeasterly along the northwesterly projection of North Redfish Drive continuing along the centerline of North Redfish Drive to its centerline intersection with Burns Street;

THENCE northeasterly along the centerline of Burns Street to its intersection with Hacker Road;

THENCE northwesterly along the centerline of Hacker Road to its centerline intersection with Moore Street;

THENCE northeasterly along the centerline of Moore Street to its centerline intersection with Overton Street;

THENCE northwesterly along the centerline of Overton Street to its centerline intersection with Caldwell Street;

THENCE northeasterly along the centerline of Caldwell Street to its centerline intersection with Renaud Street;

THENCE northwesterly along the centerline of Renaud Street to its centerline intersection with Bulldog Lane;

THENCE northeasterly along the centerline of Bulldog Lane to its centerline intersection with SH 6;

THENCE southeasterly along the centerline of SH 6 to its centerline intersection with Pecanwood Street;

THENCE northeasterly and northwesterly along the centerline of Pecanwood Street to its centerline intersection with FM 519;

THENCE northeasterly along the centerline of FM 519 to its centerline intersection of Highland Bayou;

THENCE southeasterly and northeasterly along the centerline of Highland Bayou to its centerline intersection with Marchand Bayou;

THENCE northerly along the centerline of Marchand Bayou to the centerline intersection of FM 519;

THENCE proceeding northerly along the centerline of Marchand Bayou to a westerly turn of the Hitchcock-La Marque City limit line;

**VOTING PRECINCT NO. 226**

THENCE following the Hitchcock-La Marque City limit line to the northeasterly corner of Jack Brooks Park;

THENCE westerly along the northerly line of Jack Brooks Park to the La Marque City Limit line at the northwesterly corner of said Park;

THENCE southerly along the La Marque City Limit line and a southerly projection of said line to the centerline of SH 6;

THENCE southeasterly along the centerline of State Highway 6 to the centerline intersection of Mecom Road;

THENCE southerly along the centerline of Mecom Road to the centerline intersection of FM 2004;

THENCE southwesterly along the centerline of FM 2004 to the Galveston-Brazoria County line;

THENCE southeasterly along the Galveston-Brazoria County line and southeasterly projection of the County line to its intersection with a line that is always halfway between the Mainland and Galveston Island;

THENCE northeasterly along said line that is always halfway between the Mainland and Galveston Island to its intersection with an easterly projection of the north line of the Highland Bayou Diversion Channel;

THENCE northerly to the Tiki Island City Limits;

THENCE northerly, westerly and northeasterly around Tiki Island to the LaMarque ISD line;

THENCE northwesterly along the LaMarque ISD line to the intersection of the centerline of Highland Bayou and the Galveston Bay Shoreline;

THENCE southwesterly along the Galveston Bay Shoreline to its intersection with an easterly projection of the north line of the Highland Bayou Diversion Channel;

THENCE westerly along said projection and along the north line of the Highland Bayou Diversion Channel to its intersection with the centerline of Flamingo Isle Road;

THENCE northerly along the centerline of Flamingo Isle Road to the centerline intersection of the south bank of Bashford Bayou, the place of beginning.

**VOTING PRECINCT NO. 227**

BEGINNING at the centerline intersection of FM 1764 and SH 6;

THENCE southeasterly along the centerline of SH 6 to its centerline intersection of 16<sup>th</sup> Street;

THENCE easterly along the centerline of 16<sup>th</sup> Street to its centerline intersection of Main Street;

THENCE southerly along the centerline of Main Street to its centerline intersection of SH 6;

THENCE southeasterly along the centerline of SH 6 to its intersection with the southerly projection of the La Marque city limit line;

THENCE northerly along the southerly projection of the La Marque city limit line to its intersection with census block line;

THENCE southwesterly and northeasterly along the census block line to its centerline intersection with Highland Bayou;

THENCE northwesterly along the centerline of Highland Bayou to its centerline intersection with Highland A canal;

THENCE northerly along the centerline of Highland A canal to a point just north of Longmire Road intersecting with the census block line;

THENCE southeasterly and easterly along the census block line to its intersection with the Unincorporated/La Marque city limit line;

THENCE easterly, northerly and westerly along the La Marque city limit line to its intersection with the La Marque/Texas City city limit line;

THENCE westerly along the Texas City city limit line to its intersection with census block line between Ave G ½ and Ave F;

THENCE southerly along the census block line to its centerline intersection of FM 1764;

THENCE westerly and southerly along the centerline of FM 1764 to its centerline intersection of SH 6, same being the place of beginning.

**VOTING PRECINCT NO. 228**

BEGINNING at the centerline intersection of FM 1764 and SH 6;

THENCE northwesterly along the centerline of SH 6 to the centerline intersection of Tower;

THENCE northerly along the centerline of Tower to the Santa Fe city limit line where the Santa Fe City limit line turns northerly and follows the centerline of Tower;

THENCE continuing northerly along the Santa Fe city limit line to the centerline intersection of a canal;

THENCE northeasterly along said canal centerline to the centerline intersection of Ginger;

THENCE northerly along the centerline of Ginger to the centerline intersection of Larou Lane;

THENCE easterly along the centerline of Larou Lane and an extension thereof to the centerline intersection of a canal;

THENCE northerly along said canal centerline to the centerline intersection of Dickinson Bayou;

THENCE easterly along the centerline of Dickinson Bayou to its intersection with the Dickinson City limit line;

THENCE southerly and easterly along the Dickinson City limit line to the Texas City city limit line;

THENCE southerly and easterly along the Texas City city limit line to the intersection of the Santa Fe City limit line;

THENCE southerly along the Santa Fe City limits line to the centerline of FM 1764;

THENCE westerly and southerly along the centerline of FM 1764 to the centerline intersection of SH 6, the place of beginning.

**VOTING PRECINCT NO. 232**

**BEGINNING** at the northerly bank of Highland Bayou and the centerline intersection of Fairwood Road;

**THENCE** northerly along the centerline of Fairwood Road to the centerline intersection of FM 519;

**THENCE** continuing northerly along the centerline of Vauthier to the centerline intersection of Cedar Drive;

**THENCE** easterly along the centerline Cedar Drive to the centerline intersection of Lake Road;

**THENCE** southerly along the centerline of Lake Road to its centerline intersection of Pecos;

**THENCE** easterly along the centerline of Pecos to the intersection of a southerly projection of Veronica;

**THENCE** northerly along the southerly projection of Veronica to the centerline of Veronica continuing northerly to its centerline intersection of Cedar Drive;

**THENCE** easterly along the centerline of Cedar Drive to its centerline intersection of Bayou Road;

**THENCE** southerly along the centerline of Bayou Road to its centerline intersection of Oleander;

**THENCE** westerly along the centerline of Oleander to its westerly projection to the centerline intersection of Lenz Road;

**THENCE** southeasterly along the centerline of Lenz Road to the centerline intersection of Little;

**THENCE** easterly along the centerline of Little to its centerline intersection of Bayou Road;

**THENCE** southerly along the centerline of Bayou Road to its centerline intersection with FM 519;

**THENCE** westerly along the centerline of FM 519 to its centerline intersection with Franklin;

**THENCE** southerly along the centerline of Franklin to its centerline intersection with IH 45;

**THENCE** southeasterly along the centerline of IH 45 to its intersection with census block line just west of Bayou Road;

**THENCE** northwesterly along the census block line to its intersection with the southerly ROW line of IH 45 just west of May Street;

**THENCE** southeasterly along the southerly ROW line of IH 45 to its centerline intersection with Bayou Road;

**THENCE** northerly along the centerline of Bayou Road to its centerline intersection with IH 45;

**THENCE** southwesterly along the centerline of IH 45 to its centerline intersection with SH 6;

**VOTING PRECINCT NO. 232**

THENCE northeasterly along the centerline of Hwy 6 to its intersection with the census block line near the east bank of Highland Bayou;

THENCE northerly, northeasterly and westerly along the census block line to its intersection with the northerly bank of Highland Bayou;

THENCE westerly and northwesterly along the northerly bank of Highland Bayou to its centerline intersection with Fairwood Road, same being the place of beginning.

**VOTING PRECINCT NO. 258**

BEGINNING at the centerline intersection of SH No. 6 and Jackson;

THENCE southerly and along the centerline of Jackson to the centerline intersection of Beriton;

THENCE southeasterly along the centerline of Beriton to the centerline intersection of Cork;

THENCE southerly along the centerline of Cork to its intersection with a southeasterly extension of the north line of Rungee Park;

THENCE northwesterly along said extension and along the north line of Rungee Park to the intersection of the north-south centerline of Rungee Park;

THENCE southerly along the north-south centerline of Rungee park to the south line of Rungee Park;

THENCE southeasterly along the south line of Rungee Park and an extension thereof to the centerline of Cork;

THENCE southerly along the centerline of Cork to the centerline intersection of Cedar;

THENCE easterly along the centerline of Cedar to the centerline intersection of Beaver Road;

THENCE southerly along the centerline of Beaver Road to its intersection with the Santa Fe City limits line;

THENCE easterly along the Santa Fe City limits line to the centerline intersection of Tree Point Lane;

THENCE southerly along the centerline of Tree Point Lane to the centerline intersection of 24<sup>th</sup> Street;

THENCE westerly along the centerline of 24<sup>th</sup> Street to its intersection with the southerly line of the Hitchcock 100-foot city limits strip;

THENCE southwesterly and southerly along the Hitchcock 100-foot city limit strip to its intersection with the centerline of FM 2004;

THENCE southwesterly along the centerline of FM 2004 to the Galveston-Brazoria County line;

THENCE northwesterly along the Galveston-Brazoria County line to the centerline intersection of SH 6;

THENCE southeasterly along the centerline of SH 6 to the centerline intersection of Jackson, the place of beginning.

**VOTING PRECINCT NO. 263**

**BEGINNING** at the centerline intersection of FM 518 and the League City-Friendswood City limit line;

**THENCE** southwesterly and westerly along the League City-Friendswood City limit line to the centerline intersection of the Algoa-Friendswood Road;

**THENCE** southerly along the centerline of the Algoa-Friendswood Road to the centerline intersection of the American Canal;

**THENCE** southeasterly and easterly along the centerline of the American Canal to its intersection with the westerly boundary line of Galveston County Municipal Utility District No. 6;

**THENCE** northerly along the westerly boundary line of Galveston County Municipal Utility District No. 6 and its northerly projection to the centerline intersection of Houston Lighting and Power Company easement;

**THENCE** southwesterly along the centerline of the Houston Lighting and Power Company easement to its intersection with the centerline of Cedar Gully;

**THENCE** northwesterly along the centerline of Cedar Gully and its meanders to its intersection with the centerline of FM 518;

**THENCE** southwesterly along the centerline of FM 518 to its intersection with League City-Friendswood City limit line, same being the place of beginning.

**VOTING PRECINCT NO. 274**

This precinct consists of all the area within the city limits of the Village of Jamaica Beach.

**VOTING PRECINCT NO. 275**

This precinct consists of all the area within the boundary of Municipal Utility District No. 1 in Pirate's Beach Subdivision.

**VOTING PRECINCT NO. 276**

**BEGINNING** at the intersection of the centerline of 81<sup>st</sup> Street with the shoreline of the Gulf of Mexico;

**THENCE** northerly along the centerline of 81<sup>st</sup> Street and Lockheed Street to the westerly projection of the centerline of Avenue N ½;

**THENCE** easterly along the projection of the centerline of Avenue N ½ to the centerline of Lake Madeline Canal;

**THENCE** northerly along the centerline of Lake Madeline Canal to the centerline of Offats Bayou;

**THENCE** westerly along the centerline of Offats Bayou to the intersection of the City Limits Line of the City of Galveston;

**THENCE** northerly along the City of Galveston City Limits Line to a point that is always midway between the Mainland and Galveston Island;

**THENCE** southwesterly and along said line which is always midway between the Mainland and Galveston Island to the northerly projection of the extension of 8 Mile Road;

**THENCE** southerly along the projected centerline of 8 Mile Road and 8 Mile Road to the shoreline of the Gulf of Mexico;

**THENCE** easterly along the shoreline of the Gulf of Mexico to the place of beginning.

**VOTING PRECINCT NO. 277**

**BEGINNING** at the centerline intersection of SH No. 6 and Avenue M;

**THENCE** south along the centerline of Avenue M to the centerline intersection of 33<sup>rd</sup> Street;

**THENCE** easterly along the centerline of 33<sup>rd</sup> Street to the centerline intersection of FM 646;

**THENCE** southerly along the centerline of FM 646 to the centerline intersection of FM 2004;

**THENCE** northeasterly along the centerline of FM 2004 to its intersection with the centerline of Mecom Road;

**THENCE** northerly and along the centerline of Mecom Road to its intersection with the centerline of SH No. 6;

**THENCE** northwesterly and along the centerline of SH No. 6 to its intersection with the centerline of Main Street;

**THENCE** northerly and along the centerline of Main Street to its intersection with the centerline of 16<sup>th</sup> Street;

**THENCE** westerly and along the centerline of 16<sup>th</sup> Street to its intersection with the centerline of SH No. 6;

**THENCE** northwesterly and along the centerline of SH No. 6 to its intersection with the centerline of Avenue M, same being the place of beginning.

**VOTING PRECINCT NO. 278**

BEGINNING at the centerline intersection of SH No. 6 and Jackson;

THENCE southerly along the centerline of Jackson to the centerline intersection of Beriton;

THENCE southeasterly along the centerline of Beriton to the centerline intersection of Cork;

THENCE southerly along the centerline of Cork to it's intersection with a southeasterly extension of the north line of Runge Park;

THENCE northwesterly along said extension and along the north line of Runge Park to the intersection of the north-south centerline of Runge Park;

THENCE southerly along the north-south centerline of Runge Park to the south line of Runge Park;

THENCE southeasterly along the south line of Runge Park and an extension thereof to the centerline of Cork;

THENCE southerly along the centerline of Cork to the centerline intersection of Cedar;

THENCE easterly along the centerline of Cedar to the centerline intersection of Beaver Road;

THENCE southerly along the centerline of Beaver Road to it's intersection with the Santa Fe City limits line;

THENCE easterly along the Santa Fe City limits line to the centerline intersection of Tree Point Lane;

THENCE southerly along the centerline of Tree Point Lane to the centerline intersection of 24<sup>th</sup> Street;

THENCE westerly along the centerline of 24<sup>th</sup> Street to it's intersection with the southerly line of the Hitchcock 100 foot city limits strip;

THENCE southwesterly and southerly along the Hitchcock 100 foot city limits strip to it's intersection with the centerline of FM 2004;

THENCE northeasterly along the centerline of FM 2004 to the centerline intersection of FM 646;

THENCE northerly along the centerline of FM 646 to the centerline intersection of 33<sup>rd</sup> Street;

THENCE northwesterly along the centerline of 33<sup>rd</sup> Street to the centerline intersection of Avenue M;

THENCE north along the centerline of Avenue M to the centerline intersection of SH 6;

THENCE northwesterly along the centerline of Sh 6 to the centerline intersection of Jackson, the place of beginning.

**VOTING PRECINCT NO. 279**

**BEGINNING** at the centerline intersection of SH 6 and the centerline of Tower;

**THENCE** northerly along the centerline of Tower to the Santa Fe City limit line where the Santa Fe City limit line turns northerly and follows the centerline of Tower;

**THENCE** continuing northerly along the Santa Fe City limit line (centerline Tower) and the northerly projection of said line to the centerline intersection of a canal;

**THENCE** northeasterly along said canal centerline to the centerline intersection of Ginger;

**THENCE** northerly along the centerline of Ginger to the centerline intersection of Larou Lane;

**THENCE** easterly along the centerline of Larou Lane and an extension thereof to the centerline intersection of a canal;

**THENCE** northerly along said canal centerline to the centerline intersection of Dickinson Bayou;

**THENCE** westerly and northerly along the centerline of Dickinson Bayou to the centerline intersection of FM 517;

**THENCE** westerly along the centerline of FM 517 to the Galveston-Brazoria county line;

**THENCE** southerly along the Galveston-Brazoria county line to the centerline intersection of SH 6;

**THENCE** southeasterly along the centerline of SH 6 to the centerline intersection of Tower, and also place of beginning.

**VOTING PRECINCT NO. 280**

**BEGINNING** at the intersection of IH-45 and the Dickinson-Texas City city limits line;

**THENCE** southwesterly, southerly, easterly and northerly along the Texas City city limit line to the centerline intersection of IH-45;

**THENCE** northwesterly along the centerline of IH-45 to the intersection of the Dickinson-Texas City city limit line, the place of beginning.

**VOTING PRECINCT NO. 281**

**BEGINNING** at the intersection of the north right-of-way line of FM 517 and the League City city limit line(the west line of Prairie Estates Subdivision);

**THENCE** northerly, easterly, southerly and westerly along the League City city limit line around the Prairie Estates Subdivision back to the place of beginning.

**VOTING PRECINCT NO. 283**

**BEGINNING** at the centerline intersection of I-45 and FM 646;

**THENCE** southwesterly, and southerly along the centerline of FM 646 to the intersection with the Dickinson city limit line;

**THENCE** easterly, northerly and northeasterly along the Dickinson city limit line to its centerline intersection with I-45;

**THENCE** northwesterly along the centerline of I-45 to the centerline intersection of FM 646, same being the place of beginning.

VOTING PRECINCT NO. 301

**BEGINNING** at the intersection of the centerline of FM 2004 and a projection of the northerly line of the Mall of the Mainland;

**THENCE** southerly along the centerline of FM 2004 to the centerline intersection of FM 1764;

**THENCE** westerly along the centerline of FM 1764 to the centerline intersection of IH 45;

**THENCE** northwesterly along the centerline of IH 45 to the Texas City city limit;

**THENCE** easterly along the Texas City city limit to the centerline intersection of State Highway 3;

**THENCE** southeasterly along the centerline of SH 3 to the centerline intersection of the Moses Bayou Canal;

**THENCE** westerly along the centerline of the Moses Bayou Canal to the centerline of Century Boulevard;

**THENCE** northerly along the centerline of Century Boulevard to the centerline intersection of the Galveston County Water Authority Canal;

**THENCE** westerly along the centerline of the Galveston County Water Authority Canal to the centerline intersection of FM 2004;

**THENCE** southerly along the centerline of FM 2004 to the intersection of a projection of the northerly line of the Mall of the Mainland, the place of beginning.

VOTING PRECINCT NO. 306

BEGINNING at the centerline intersection of Broadway and 25<sup>th</sup> Street;  
THENCE northerly on 25<sup>th</sup> Street to the northern Galveston shoreline;  
THENCE easterly along the northern Galveston shoreline to a projection of 18<sup>th</sup> Street;  
THENCE southerly from projection of 18<sup>th</sup> Street and northern Galveston shoreline to the centerline of the Southern Pacific railroad;  
THENCE easterly along the Southern Pacific railroad to the projected intersection at 11<sup>th</sup> Street;  
THENCE southerly from 11<sup>th</sup> Street projection to census block;  
THENCE southerly along census block, follow to the centerline intersection of Barracuda Ave;  
THENCE easterly on Barracuda Ave to the centerline intersection of North Holiday Drive;  
THENCE northerly on North Holiday Drive to the centerline intersection of Albacore Ave;  
THENCE easterly on Albacore to the centerline intersection of Marine;  
THENCE southerly on Marine to the centerline intersection of Dolphin Ave;  
THENCE northerly on Ferry Road to the intersection of the census block;  
THENCE southerly along census block to the centerline intersection of Seawall Blvd;  
THENCE northeasterly on Seawall Blvd to the centerline intersection of Boddeker Road;  
THENCE northeasterly on Boddeker Road to the centerline intersection of the inner barge canal;  
THENCE southerly along inner barge canal to the intersection of the Galveston County line;  
THENCE southwesterly along the Galveston county line to the centerline projection of 31<sup>st</sup> Street;  
THENCE northerly from the centerline projection of 31<sup>st</sup> Street to the south ROW of Seawall Blvd;  
THENCE easterly along Seawall Blvd ROW to the centerline intersection of Seawall Blvd;  
THENCE easterly on Seawall Blvd to the centerline intersection of University Blvd;  
THENCE northerly on University Blvd to the centerline intersection Broadway;  
THENCE westerly on Broadway back to the point of beginning.

VOTING PRECINCT NO. 308

BEGINNING at the centerline intersection of Broadway and 25<sup>th</sup> Street;  
THENCE southerly on 25<sup>th</sup> Street to the centerline intersection of Ave O;  
THENCE westerly on Ave O to the centerline intersection of 31<sup>st</sup> Street;  
THENCE southerly on 31<sup>st</sup> Street to the centerline intersection of Seawall Blvd;  
THENCE easterly on Seawall Blvd to the centerline intersection of University Blvd;  
THENCE northerly on University Blvd to the centerline intersection of Broadway;  
THENCE westerly on Broadway back to the point of beginning.

VOTING PRECINCT NO. 309

BEGINNING at the centerline intersection of 59<sup>th</sup> Street and Broadway;  
THENCE northerly on 59<sup>th</sup> Street to the intersection of the GH&H railroad;  
THENCE westerly along GH&H railroad to the centerline intersection of 77<sup>th</sup> Street;  
THENCE northerly on 77<sup>th</sup> Street to the intersection of the northern Galveston shoreline;  
THENCE westerly along the northern Galveston shoreline to the intersection of the GH&H railroad;  
THENCE northwesterly along the GH&H railroad to the tip of Galveston Bay;  
THENCE southwesterly from the tip of Galveston Bay to the centerline intersection of Broadway;  
THENCE southeasterly on Broadway to the intersection of census block;  
THENCE southerly along the census block to the centerline intersection of Broadway;  
THENCE easterly on Broadway back to the point of beginning.

VOTING PRECINCT NO. 311

BEGINNING at the centerline intersection of 25<sup>th</sup> and Broadway;

THENCE northerly on 25<sup>th</sup> Street to the centerline projection of 25<sup>th</sup> Street located on the northern Galveston shoreline;

THENCE westerly along the shoreline to the projection of 36<sup>th</sup> Street;

THENCE northeasterly from the 36<sup>th</sup> Street projection line to the centerline of the Galveston Ship Channel;

THENCE westerly along the Galveston ship channel to the centerline intersection of Seawolf Parkway;

THENCE northerly on Seawolf Parkway to the intersection of southern shoreline of Pelican Island;

THENCE northeasterly from the southern shoreline of Pelican Island to the centerline intersection of the GIWW;

THENCE southwesterly along the GIWW to the centerline of the causeway bridge;

THENCE southerly on the causeway bridge to the intersection of the northern shoreline of Galveston;

THENCE southeasterly along the shoreline to the projected centerline of 77<sup>th</sup> Street;

THENCE southerly from the 77<sup>th</sup> Street centerline projection to the centerline intersection of 77<sup>th</sup> Street;

THENCE southerly on 77<sup>th</sup> Street to the intersection of the GH&H railroad;

THENCE easterly along the GH&H railroad to the centerline intersection of 59<sup>th</sup> Street;

THENCE southerly on 59<sup>th</sup> Street to the centerline intersection of Broadway;

THENCE easterly on Broadway to the centerline intersection at 57<sup>th</sup> Street;

THENCE southerly on 57<sup>th</sup> Street to the centerline intersection of Ave K;

THENCE easterly on Ave K to the centerline intersection of 56<sup>th</sup> Street;

THENCE southerly on 56<sup>th</sup> Street to the centerline intersection of Ave L;

THENCE easterly on Ave L to the centerline intersection of 55<sup>th</sup> Street;

THENCE northerly on 55<sup>th</sup> Street to the centerline intersection of Ave K;

THENCE easterly on Ave K to the centerline intersection of 52<sup>nd</sup> Street;

THENCE southerly on 52<sup>nd</sup> Street to the centerline intersection of Ave L;

THENCE easterly on Ave L to the centerline intersection of 50<sup>th</sup> Street;

THENCE northerly on 50<sup>th</sup> Street to the centerline intersection of Broadway;

THENCE easterly on Broadway back to point of beginning.

**VOTING PRECINCT NO. 312**

**BEGINNING** at the centerline intersection of IH-45 and Century Boulevard;

**THENCE** northwesterly along the centerline of IH-45 to the centerline intersection of FM 1764;

**THENCE** northeasterly along the centerline of FM 1764 to the centerline intersection of FM 2004;

**THENCE** northerly along the centerline of FM 2004 to a westerly projection of the north line of the Mall of the Mainland;

**THENCE** easterly along said projection and along the north line of the Mall of the Mainland and an easterly projection thereof to the centerline of Century Boulevard;

**THENCE** southerly along the centerline of Century Boulevard to a westerly projection of the north line of the Mainland Crossing Shopping Center;

**THENCE** easterly southeasterly and southerly along the Mainland Crossing Shopping Center property line and a projection thereof to the centerline of FM 1764;

**THENCE** northwesterly along the centerline of FM 1764 to the centerline intersection of Century Boulevard;

**THENCE** southerly along the centerline of Century Boulevard to the centerline intersection of IH-45, the place of beginning.

VOTING PRECINCT NO. 314

BEGINNING at the centerline intersection of Broadway and 25<sup>th</sup> Street;  
THENCE westerly on Broadway to the centerline intersection of 45<sup>th</sup> Street;  
THENCE southerly on 45<sup>th</sup> Street to the centerline intersection of Ave L;  
THENCE easterly on Ave L to the centerline intersection of 44<sup>th</sup> Street;  
THENCE southerly on 44<sup>th</sup> Street to the centerline intersection of Ave M;  
THENCE easterly on Ave M to the centerline intersection of 43<sup>rd</sup> Street;  
THENCE southerly on 43<sup>rd</sup> Street to the centerline intersection of Ave O;  
THENCE easterly on Ave O to the centerline intersection of 25<sup>th</sup> Street;  
THENCE northerly on 25<sup>th</sup> Street back to the point of beginning.

VOTING PRECINCT NO. 315

BEGINNING at the centerline intersection of Ave O and 31<sup>st</sup> Street;  
THENCE southerly along 31<sup>st</sup> Street to the centerline intersection of Seawall Blvd;  
THENCE easterly on Seawall Blvd to the centerline intersection of 28<sup>th</sup> Street;  
THENCE from 28<sup>th</sup> Street to the southern ROW of Seawall Blvd;  
THENCE westerly along the southern ROW of Seawall Blvd to a centerline projection of 31<sup>st</sup> Street;  
THENCE southerly from the centerline projection of 31<sup>st</sup> Street to the Galveston County line;  
THENCE westerly along Galveston County line to a centerline projection of 45<sup>th</sup> Street;  
THENCE northerly from the centerline projection of 45<sup>th</sup> Street to the centerline intersection of Seawall Blvd;  
THENCE easterly on Seawall Blvd to the centerline intersection of 41<sup>st</sup> Street;  
THENCE northerly on 41<sup>st</sup> Street to the centerline intersection of Ave S ½ ;  
THENCE westerly on Ave S ½ to the centerline intersection of the 42<sup>nd</sup> Street;  
THENCE northerly on 42<sup>nd</sup> Street to the intersection of the census block;  
THENCE westerly along the census block to the centerline intersection of 43<sup>rd</sup> Street;  
THENCE southerly on 43<sup>rd</sup> Street to the centerline intersection of Ave T;  
THENCE westerly on Ave T to the centerline intersection of 44<sup>th</sup> Street;  
THENCE northerly on 44<sup>th</sup> Street to the intersection of the census block;  
THENCE westerly along the census block to the centerline of Woodrow Ave;  
THENCE westerly on Woodrow Ave to the centerline intersection of 46<sup>th</sup> Street;  
THENCE northerly on 46<sup>th</sup> Street to the centerline intersection of Ave S ½ ;  
THENCE easterly on Ave S ½ to the centerline of 45<sup>th</sup> Street;  
THENCE northerly on 45<sup>th</sup> Street to the intersection of the census block;  
THENCE westerly along census block to the centerline intersection of 46<sup>th</sup> Street;  
THENCE northerly on 46<sup>th</sup> Street to the centerline intersection of Ave S;  
THENCE easterly on Ave S to the centerline intersection of 45<sup>th</sup> Street;  
THENCE northerly on 45<sup>th</sup> Street to the intersection of census block;  
THENCE easterly on census block to the centerline of 43<sup>rd</sup> Street;  
THENCE northerly on 43<sup>rd</sup> Street to the centerline intersection of Ave O;  
THENCE easterly on Ave O back to point of beginning.

VOTING PRECINCT NO. 316

BEGINNING at the centerline intersection of 45<sup>th</sup> Street and Broadway;  
THENCE westerly on Broadway to the centerline intersection of 50<sup>th</sup> Street;  
THENCE southerly on 50<sup>th</sup> Street to the centerline intersection of Ave L;  
THENCE westerly on Ave L to the centerline intersection of 52<sup>nd</sup> Street;  
THENCE northerly on 52<sup>nd</sup> Street to the centerline intersection of Ave K;  
THENCE westerly on Ave K to the centerline intersection of 55<sup>th</sup> Street;  
THENCE southerly on 55<sup>th</sup> Street to the centerline intersection of Ave L;  
THENCE westerly on Ave L to the centerline intersection of 56<sup>th</sup> Street;  
THENCE northerly on 56<sup>th</sup> Street to the centerline intersection of Ave K;  
THENCE westerly on Ave K to the centerline intersection of 57<sup>th</sup> Street;  
THENCE northerly on 57<sup>th</sup> Street to the centerline intersection of Broadway;  
THENCE westerly on Broadway to the projected centerline of Bayou Circle;  
THENCE southerly on Bayou Circle to the centerline intersection of Bayou Shore Drive;  
THENCE southerly on Bayou Shore Drive to the centerline intersection of Bernardo De Galvez;  
THENCE easterly on Bernardo De Galvez to the centerline intersection of 57<sup>th</sup> Street;  
THENCE southerly on 57<sup>th</sup> Street to the centerline intersection of Leeland;  
THENCE westerly on Leeland to the centerline intersection of Saladia;  
THENCE southeasterly on Saladia to the intersection of the census block;  
THENCE westerly along the census block to the centerline intersection of 59<sup>th</sup> Street;  
THENCE northerly on 59<sup>th</sup> Street to the centerline intersection of Ave Q ½ ;  
THENCE westerly on Ave Q ½ to the centerline intersection of 61<sup>st</sup> Street;  
THENCE southerly on 61<sup>st</sup> Street to the centerline intersection of Ave R;  
THENCE westerly on Ave R to the centerline intersection of 66<sup>th</sup> Street;  
THENCE southerly on 66<sup>th</sup> Street to the centerline intersection of Stewart Road;  
THENCE westerly on Stewart Road to the centerline intersection of 68<sup>th</sup> Street;  
THENCE southerly on 68<sup>th</sup> Street to the centerline intersection of Oleander Ave;  
THENCE easterly on Oleander Ave to the centerline intersection of 66<sup>th</sup> Street;  
THENCE northerly on 66<sup>th</sup> Street to the intersection of the census block;

THENCE easterly along the census block to the centerline of 61<sup>st</sup> Street;  
THENCE southerly on 61<sup>st</sup> Street to the intersection of the census block;

THENCE easterly on the census block to the centerline intersection of 59<sup>th</sup> Street;

THENCE northerly on 59<sup>th</sup> Street to the centerline of Ave S;

THENCE easterly on Ave S to the centerline intersection of 57<sup>th</sup> Street;

THENCE northerly on 57<sup>th</sup> Street to the centerline intersection of Ave S;

THENCE easterly on Ave S to the centerline intersection of 56<sup>th</sup> Street;

THENCE northerly on 56<sup>th</sup> Street to the intersection of the census block;

THENCE westerly along the census block line to the centerline intersection at 55<sup>th</sup> Street;

THENCE northerly on 55<sup>th</sup> Street to the centerline intersection of Ave R ½ ;

THENCE easterly on Ave R ½ to the centerline intersection of 54<sup>th</sup> Street;

THENCE northerly on 54<sup>th</sup> Street to the centerline intersection of Ave Q ½ ;

THENCE easterly on Ave Q ½ to the centerline intersection of 52<sup>nd</sup> Street;

THENCE southerly on 52<sup>nd</sup> Street to the census block;

THENCE easterly along the census block to the centerline intersection of 51<sup>st</sup> Street;

THENCE northerly on 51<sup>st</sup> Street to the centerline intersection of Ave Q ½ ;

THENCE easterly on Ave Q ½ to the centerline intersection of 50<sup>th</sup> Street;

THENCE northerly on 50<sup>th</sup> Street to the intersection of the census block;

THENCE easterly along the census block to the centerline intersection of 49<sup>th</sup> Street;

THENCE northerly on 49<sup>th</sup> Street to the intersection of the census block;

THENCE westerly along the census block to the centerline intersection of 51<sup>st</sup> Street;

THENCE northerly on 51<sup>st</sup> Street to the centerline intersection of Ave N ½ ;

THENCE easterly on Ave N ½ to the centerline intersection of 50<sup>th</sup> Street;

THENCE northerly on 50<sup>th</sup> Street to the centerline intersection of Fannin;

THENCE easterly on Fannin to the centerline intersection of Milam Drive;

THENCE northerly on Milam Drive to the centerline intersection of Houston Drive;

THENCE westerly on Houston Drive to the centerline intersection of 50<sup>th</sup> Street;

THENCE northerly on 50<sup>th</sup> Street to the centerline intersection of Austin Drive;

THENCE easterly on Austin Drive to the centerline intersection of 49<sup>th</sup> Street;

THENCE northerly on 49<sup>th</sup> Street to the centerline intersection of Ave L;

THENCE easterly on Ave L to the centerline intersection of 45<sup>th</sup> Street;

THENCE northerly on 45<sup>th</sup> Street back to the place of beginning.

VOTING PRECINCT NO. 330

BEGINNING at the centerline intersection of Cedar Drive and Bayou Road;  
THENCE southerly on Bayou Road to the centerline intersection of Oleander Drive;  
THENCE westerly on Oleander Drive to the centerline intersection of Little;  
THENCE southerly along Little to the centerline intersection of Bayou Road;  
THENCE southerly along Bayou Road to the centerline intersection of FM 519;  
THENCE westerly on FM 519 to the centerline intersection of Franklin;  
THENCE southerly on Franklin to the centerline intersection of IH-45 (Gulf Freeway);  
THENCE southerly on IH-45 (Gulf Freeway) to the intersection of the census block;  
THENCE following the census block to the centerline intersection of Bayou Road;  
THENCE northerly on Bayou Road to the centerline intersection of IH-45 (Gulf Freeway);  
THENCE southerly on IH-45 (Gulf Freeway) to the centerline of the GIWW;  
THENCE northeasterly along the GIWW to intersection of the GH&H Railroad;  
THENCE northerly along the GH&H Railroad to the centerline intersection of FM 1765;  
THENCE westerly on FM 1765 to the centerline intersection of Bayou Road;  
THENCE southerly on Bayou Road to the centerline intersection of Laurel;  
THENCE southeasterly on Laurel to the centerline intersection of Cedar Drive;  
THENCE westerly on Cedar Drive back to point of beginning.

VOTING PRECINCT NO. 331

BEGINNING at the centerline intersection of FM 1765 and Bayou Road;  
THENCE southerly along Bayou Road to the centerline intersection of Laurel;  
THENCE southeasterly on Laurel to the centerline intersection of Cedar Drive;  
THENCE westerly on Cedar Drive to the centerline intersection of Veronica;  
THENCE southerly on Veronica to the census block;  
THENCE southeasterly along the census block line to the centerline intersection of Pecos;  
THENCE westerly along Pecos to the centerline intersection of Lake Road;  
THENCE northerly on Lake Road to the centerline intersection of Cedar Drive;  
THENCE westerly on Cedar Drive to the centerline intersection of Vauthier;  
THENCE southerly on Vauthier to the centerline intersection of Fairwood Road;  
THENCE southerly on Fairwood Road to the centerline intersection of Highland Bayou  
THENCE westerly along Highland Bayou to the intersection of census block;  
THENCE northerly along census block to the centerline intersection of FM 519;  
THENCE westerly on FM 519 to the La Marque/Hitchcock city limit line;  
THENCE northerly along the La Marque/Hitchcock city limit line to the centerline intersection of Walker;  
THENCE northerly on Walker to the centerline intersection of Prairie;  
THENCE easterly on Prairie to the centerline intersection of Newman Road;  
THENCE northerly on Newman Road to the intersection of the census block;  
THENCE westerly along census block follow until you reach the centerline intersection of Newman Road;  
THENCE northerly on Newman Road to the centerline intersection of Hoover;  
THENCE easterly on Hoover to the centerline intersection of Bernice;  
THENCE northerly on Bernice to the centerline intersection of FM 1765;  
THENCE easterly on FM 1765 back to point of beginning.

VOTING PRECINCT NO. 334

BEGINNING at the centerline intersection of Hwy 6 and Harbor Drive;  
THENCE southerly along Harbor Drive to the northern shoreline of Basford Bayou;  
THENCE westerly along the Basford Bayou to the centerline of North Redfish Drive;  
THENCE easterly on North Redfish Drive to the centerline intersection of Burns Street;  
THENCE northerly on Burns Street to the centerline intersection of Hacker Road;  
THENCE westerly on Hacker Road to the centerline intersection of Moore Street;  
THENCE northerly on Moore Street to the centerline intersection of Overton Street;  
THENCE westerly on Overton Street to the centerline intersection of Caldwell Street;  
THENCE northerly on Caldwell to the centerline intersection of Renaud Street;  
THENCE westerly along Renaud Street to the centerline intersection of Bulldog Lane;  
THENCE northerly along Bulldog Lane to the centerline intersection of Hwy 6;  
THENCE easterly on Hwy 6 to the centerline intersection of Pecanwood Street;  
THENCE northerly on Pecanwood Street, follow until you reach the centerline intersection of FM 519;  
THENCE northerly along FM 519 to the centerline intersection of Highland Bayou;  
THENCE easterly along the Highland Bayou until you reach the census block west of Wester Drive;  
THENCE southerly along the census block until you reach the centerline intersection of Hwy 6;  
THENCE westerly on Hwy 6 back to point of beginning.

VOTING PRECINCT NO. 336

BEGINNING at the centerline intersection of Emmett F. Lowry Expy and GH&H Railroad;

THENCE southerly along the GH&H railroad to the centerline intersection of FM 1765;

THENCE westerly on FM 1765 to the intersection of the census block;

THENCE northerly along the census block to the centerline intersection of Emmett F. Lowry Expy;

THENCE easterly on Emmett F. Lowry Expy back to point of beginning.

VOTING PRECINCT NO. 338

BEGINNING at the centerline intersection of FM 1765 and East Road;  
THENCE westerly on FM 1765 to the centerline intersection of IH-45 (Gulf Fwy);  
THENCE northerly on IH-45 (Gulf Fwy) to the centerline intersection of Century Blvd;  
THENCE northerly on Century Blvd to the centerline intersection of Emmett F. Lowry Expy;  
THENCE easterly on Emmett F. Lowry Expy to the intersection of the census block;  
THENCE northerly along census block to the centerline intersection of Century Blvd;  
THENCE northerly on Century Blvd to the intersection of the census block;  
THENCE westerly along the census block to the centerline intersection of FM 2004;  
THENCE northerly on FM 2004 to the intersection of the census block;  
THENCE easterly along the census block to the centerline intersection of Century Blvd;  
THENCE southerly on Century Blvd to the centerline intersection of Moses Bayou;  
THENCE easterly along Moses Bayou to the intersection of the GH&H railroad;  
THENCE southerly along GH&H railroad to the centerline intersection of Emmett F. Lowry Expy;  
THENCE westerly on Emmett F. Lowry Expy to the intersection of the census block;  
THENCE southerly along census block to the centerline of FM 1765;  
THENCE westerly on FM 1765 to the centerline intersection of Samburn Road;  
THENCE northerly on Samburn Road to the centerline intersection of Jones Road;  
THENCE westerly on Jones Road to the centerline intersection of East Road;  
THENCE southerly on East Road back to point of orgin.

VOTING PRECINCT NO. 340

**BEGINNING** at the centerline intersection of Benson's Bayou and the League City city limit line

**THENCE** northeasterly along the League City city limits line to the centerline intersection with GH&H Railroad;

**THENCE** southeasterly along the centerline of GH&H Railroad to its intersection with Dickinson City limits line;

**THENCE** southwesterly and southeasterly along the Dickinson city limit line to the centerline intersection of Salvato Street;

**THENCE** southwesterly along the centerline of Salvato Street to the centerline intersection of SH 3;

**THENCE** northwesterly along the centerline of SH 3 to the Dickinson city limit line;

**THENCE** southwesterly along the Dickinson city limit line to the centerline intersection of Benson's Bayou;

**THENCE** northwesterly along the centerline of Benson's Bayou to the intersection of the League City city limits line same being the place of beginning.

VOTING PRECINCT NO. 341

BEGINNING at the centerline intersection of SH 3 and Salvato Street;

THENCE northeasterly along the centerline of Salvato Street to the intersection with Dickinson city limit line;

THENCE northwesterly, northeasterly, southwesterly, southeasterly, easterly and northerly along Dickinson city limit line to centerline intersection of 29<sup>th</sup> Street;

THENCE easterly along the centerline of 29<sup>th</sup> street to the centerline intersection of Colorado Ave;

THENCE southerly along the centerline of Colorado Ave to the centerline intersection of 30<sup>th</sup> Street;

THENCE westerly along the centerline of 30<sup>th</sup> Street to the centerline intersection of Texas Ave;

THENCE southerly along the centerline of Texas Ave to the centerline intersection of 32<sup>nd</sup> Street;

THENCE easterly along the centerline of 32<sup>nd</sup> Street to the centerline intersection of California Ave;

THENCE northerly along the centerline of California Ave to the intersection of the Dickinson city limit line;

THENCE easterly and southerly along the Dickinson city limit line to the centerline intersection of Owens Drive;

THENCE southerly along the centerline of Owens Drive to the centerline intersection of Melvin Utley Drive;

THENCE westerly along the centerline of Melvin Utley Drive to the centerline intersection of Baker Drive;

THENCE northerly along the centerline of Baker Drive to the centerline intersection of 34<sup>th</sup> Street;

THENCE easterly along the centerline of 34<sup>th</sup> Street to the centerline intersection of California Ave;

THENCE southerly along the centerline of California Ave to the centerline intersection of FM 517;

THENCE westerly along the centerline of FM 517 to the centerline intersection of Texas Ave;

THENCE southerly along the centerline of Texas Ave to the centerline intersection of Park Ave;

THENCE easterly and southeasterly along the centerline of Park Ave to the intersection of census block;

THENCE southerly along the census block to the centerline intersection of Dickinson Bayou;

VOTING PRECINCT NO. 341

THENCE westerly along the centerline of Dickinson Bayou to the centerline intersection of GH&H Railroad;

THENCE southeasterly along the centerline of GH&H Railroad to the intersection of the Dickinson/Texas City city limit line;

THENCE northwesterly and southeasterly along the Dickinson/Texas City city limit line to the centerline intersection of SH 3;

THENCE northwesterly along the centerline of SH 3 to the centerline intersection of Mowat Street;

THENCE northeasterly along the centerline of Mowat Street to the intersection of census block;

THENCE northwesterly along census block to the intersection of the south bank of Dickinson Bayou;

THENCE westerly along the south bank of Dickinson Bayou to the centerline intersection of SH 3;

THENCE northwesterly along the centerline of SH 3 to the north bank of Dickinson Bayou;

THENCE easterly along the north bank of Dickinson Bayou to the centerline intersection of Nebraska Street;

THENCE northwesterly along the centerline of Nebraska Street to the centerline intersection of 48<sup>th</sup> Street;

THENCE southwestery along the centerline of 48<sup>th</sup> Street to the intersection of census block;

THENCE northerly along census block to the centerline intersection of 46<sup>th</sup> Street;

THENCE northeasterly along the centerline of 46<sup>th</sup> Street to the intersection of census block;

THENCE northwesterly along census block to the centerline intersection of 45<sup>th</sup> Street;

THENCE southwestery along the centerline of 45<sup>th</sup> Street to the centerline intersection of St. Goar Street;

THENCE northerly along the centerline of St. Goar Street to the centerline intersection of FM 517;

THENCE westerly along the centerline of FM 517 to the centerline intersection SH 3;

THENCE northwesterly along the centerline of SH 3 to the centerline intersection of Salvato Street, same being the place of beginning.

VOTING PRECINCT NO. 343

BEGINNING at the centerline intersection of 5<sup>th</sup> Ave and 31<sup>st</sup> Street;  
THENCE northerly on 31<sup>st</sup> Street to the centerline intersection of 2<sup>nd</sup> Ave;  
THENCE easterly on 2<sup>nd</sup> Ave to the centerline intersection of 29<sup>th</sup> Street;  
THENCE southerly on 29<sup>th</sup> Street to the centerline intersection of Texas Ave;  
THENCE easterly on Texas Ave to the centerline intersection of 28<sup>th</sup> Street;  
THENCE northerly on 28<sup>th</sup> Street to the centerline intersection of 2<sup>nd</sup> Ave;  
THENCE easterly on 2<sup>nd</sup> Ave to the centerline intersection of 27<sup>th</sup> Street;  
THENCE northerly on 27<sup>th</sup> Street to the centerline intersection of 2<sup>nd</sup> Ave;  
THENCE easterly along 2<sup>nd</sup> Ave to the centerline intersection of 25<sup>th</sup> Street;  
THENCE northerly on 25<sup>th</sup> Street to the centerline intersection of 3<sup>rd</sup> Ave;  
THENCE westerly on 3<sup>rd</sup> Ave to the centerline intersection on 27<sup>th</sup> Street;  
THENCE northerly on 27<sup>th</sup> Street to the centerline intersection of 6<sup>th</sup> Ave;  
THENCE easterly on 6<sup>th</sup> Ave to the centerline intersection of 26<sup>th</sup> Street;  
THENCE northerly on 26<sup>th</sup> Street to the centerline intersection of 7<sup>th</sup> Ave;  
THENCE easterly on 7<sup>th</sup> Ave to the centerline intersection of 25<sup>th</sup> Street;  
THENCE northerly on 25<sup>th</sup> Street to the centerline intersection of 12<sup>th</sup> Ave;  
THENCE easterly on 12<sup>th</sup> Ave to the centerline intersection of 23<sup>rd</sup> Street;  
THENCE southerly on 23<sup>rd</sup> Street to the intersection of the census block;  
THENCE easterly along the census block to the centerline intersection of 21<sup>st</sup> Street;  
THENCE northerly on 21<sup>st</sup> Street to the centerline intersection of 13<sup>th</sup> Ave;  
THENCE easterly on 13<sup>th</sup> Ave to the intersection of the census block;  
THENCE southerly along the census block to the centerline intersection of 9<sup>th</sup> Ave;  
THENCE easterly on 9<sup>th</sup> Ave to the intersection of the census block;  
THENCE northerly and easterly along the census block to the centerline intersection of 10<sup>th</sup> Street;  
THENCE northerly on 10<sup>th</sup> Street to the centerline intersection of 11<sup>th</sup> Ave;  
THENCE easterly on 11<sup>th</sup> Ave to the centerline intersection of 9<sup>th</sup> Ave;  
THENCE southerly on 9<sup>th</sup> Street to the centerline intersection of 8<sup>th</sup> Ave  
THENCE westerly on 8<sup>th</sup> Ave to the centerline intersection of 10<sup>th</sup> Street;

THENCE southerly on 10<sup>th</sup> Street to the centerline intersection of 4<sup>th</sup> Ave;

THENCE westerly on 4<sup>th</sup> Ave to the centerline intersection of 11<sup>th</sup> Street;  
VOTING PRECINCT NO. 343

THENCE southerly on 11<sup>th</sup> Street to the centerline projection of 8<sup>th</sup> Ave;

THENCE westerly on 8<sup>th</sup> Ave to the intersection of the census block;

THENCE westerly along census block to the centerline intersection of Grant Ave;

THENCE northerly on Grant Ave to the centerline intersection of 5<sup>th</sup> Ave;

THENCE easterly on 5<sup>th</sup> Ave back to point of beginning.

VOTING PRECINCT NO. 345

BEGINNING at the intersection of the centerline of Bay Street and 9<sup>th</sup> Ave;

THENCE easterly, southerly, westerly and northerly along 9<sup>th</sup> Ave and the Texas City Dike and the shoreline of the Port of Texas City and across Galveston Bay to the intersection with the centerline of the GIWW as shown on the voting pct map;

THENCE westerly, northerly, easterly and southerly along the centerline of the GIWW, GH&H Railroad, SH 146, Texas Ave and other city of Texas City streets to the place of beginning as shown on the voting pct map.

VOTING PRECINCT NO. 347

BEGINNING at the intersection of the centerline of SH 146 and 25<sup>th</sup> Ave;

THENCE easterly, southerly and westerly along 25<sup>th</sup> Ave and the centerline of the city of Texas City Streets and lines to the intersection of the centerline of Texas Ave and SH 146;

THENCE northerly along the centerline of SH 146 to the point of beginning.

VOTING PRECINCT NO. 389

BEGINNING at the intersection of the centerline of SH 3 and FM 517;

THENCE northerly, westerly, southerly and easterly along the centerline of SH 3 and the city of Dickinson streets as shown on the voting pct map to the intersection of the centerline of Gill Road;

THENCE southerly, easterly, northerly and westerly along the centerline of Gill Road and the city of Dickinson streets as shown on the voting pct map to the point of beginning.

**VOTING PRECINCT NO. 391**

**BEGINNING** at the intersection of the centerline of 21<sup>st</sup> Street and California Street;

**THENCE** westerly, southerly, easterly, and northerly along the centerline of the City of Dickinson streets and lines as shown on the voting precinct map to the centerline of California Street;

**THENCE** northerly along California Street to the place of beginning.

**VOTING PRECINCT NO. 394**

**BEGINNING** at the intersection of the centerline of California Street and the State Rep. 23/24 line;

**THENCE** easterly, southerly, westerly, and northerly along the centerline of the streets and lines of the City of Dickinson as shown on the voting precinct map to the place of beginning.

VOTING PRECINCT NO. 398

**BEGINNING** at the centerline intersection of GH&H Railroad and the League City city limit line;

**THENCE** northeasterly along the League City city limit line to the centerline intersection of Wyoming Ave;

**THENCE** southeasterly along the centerline of Wyoming Ave and the southeasterly projection of Wyoming Ave to the centerline intersection of 27<sup>th</sup> Street;

**THENCE** northeasterly along the centerline of 27<sup>th</sup> Street to the centerline intersection of FM 1266;

**THENCE** southerly along the centerline of FM 1266 to a easterly projected line just north of 28<sup>th</sup> Street;

**THENCE** easterly along said projected line to the intersection of the Dickinson city limit line;

**THENCE** southerly, easterly, southeasterly and northwesterly along the Dickinson city limit line to the centerline intersection with GH&H Railroad;

**THENCE** northeasterly along the centerline of GH&H Railroad to the League City city limit line, same being the place of beginning.

VOTING PRECINCT NO. 399

**BEGINNING** at the centerline intersection of League City Parkway (FM 96) and HL&P R.O.W.;

**THENCE** southwesterly and southeasterly along the centerline of the HL&P R.O.W. to its intersection with a southwesterly projection of the centerline of Mulberry;

**THENCE** southwesterly from the centerline intersection of the HL&P R.O.W. and the southwesterly projection of Mulberry to the centerline intersection of Benson's Bayou;

**THENCE** southeasterly along the centerline of Benson's Bayou to the intersection of League City city limits;

**THENCE** northeasterly and southeasterly along the League City city limits to the centerline intersection of Wyoming Ave;

**THENCE** northwesterly along the centerline of Wyoming Ave. to the centerline intersection of FM 646 and FM 270;

**THENCE** northwesterly along the centerline of FM 270 to the centerline intersection of League City Parkway (FM 96);

**THENCE** westerly and southwesterly along the centerline of League City Parkway (FM 96) to its centerline intersection with HL&P R.O.W., same being the place of beginning.

VOTING PRECINCT NO. 401

**BEGINNING** at the intersection of the centerline of Algoa-Friendswood Road and the centerline of American Canal;

**THENCE** westerly, northwesterly and southwesterly along the centerline of American Canal to its intersection with a easterly census track boundary line;

**THENCE** northerly along the census track boundary line to its intersection with the League City – Friendswood City limits line;

**THENCE** northeasterly and easterly along the League City-Friendswood City limits line to its intersection with the centerline of Algoa-Friendswood Road;

**THENCE** southerly along the centerline of Algoa-Friendswood Road to its intersection with the centerline of American Canal, the same being the place of beginning.

## VOTING PRECINCT NO. 439

BEGINNING at the centerline intersection of Hughes Road and IH 45;

THENCE northwesterly along the centerline of IH 45 to the intersection of the League City/Dickinson city limit line;

THENCE northerly, easterly, northeasterly and northwesterly along the League City/Dickinson city limit line to the centerline intersection of Gill Road;

THENCE southeasterly along the centerline of Gill Road to the centerline intersection of Rodeo Bend;

THENCE northeasterly along the centerline of Rodeo Bend to the centerline intersection of Benson's Bayou;

THENCE southerly along the centerline of Benson's Bayou to the centerline intersection of Sunset Drive;

THENCE northeasterly along the centerline of Sunset Drive to the centerline intersection of Timber Drive;

THENCE southeasterly along the centerline of Timber Drive to the centerline intersection of Deats Road;

THENCE northeasterly along the centerline of Deats Road to the centerline intersection of Ave H;

THENCE southeasterly along the centerline of Ave H to the centerline intersection of Pecan Street;

THENCE southwestery along the centerline of Pecan Street to the centerline intersection of Timber Street;

THENCE southeasterly along the centerline of Timber Drive to the centerline intersection of FM 517;

THENCE easterly along the centerline of FM 517 to the centerline intersection of Dakota Street;

THENCE southerly along the centerline of Dakota Street to the centerline intersection of 44<sup>th</sup> Street;

THENCE easterly along the centerline of 44<sup>th</sup> Street to the centerline intersection of Nevada Street;

THENCE northerly along the centerline of Nevada Street to the centerline intersection of FM 517;

THENCE easterly along the centerline of FM 517 to the centerline intersection of St. Goar Street;

THENCE southerly along the centerline of St. Goar Street to the centerline intersection of 45<sup>th</sup> Street;

THENCE northeasterly along the centerline of 45<sup>th</sup> Street to the intersection of the census block line;

THENCE southeasterly along the census block line to the centerline intersection of 46<sup>th</sup> Street;

THENCE southwestery along the centerline of 46<sup>th</sup> Street to the intersection of the census block line;

THENCE southerly along the census block line to the centerline intersection of 48<sup>th</sup> Street;

THENCE northeasterly along the centerline of 48<sup>th</sup> Street to the centerline intersection of Nebraska Street;

THENCE southeasterly along the centerline of Nebraska Street to the north bank of Dickinson Bayou;

THENCE westerly along the north bank of Dickinson Bayou to the centerline intersection of SH 3;

THENCE southeasterly along the centerline of SH 3 to the south bank of Dickinson Bayou;

THENCE easterly along the south bank of Dickinson Bayou to the intersection of the census block line;

THENCE southeasterly along the census block line to the centerline intersection of Mowat Street

THENCE southwesterly along the centerline of Mowat Street to the centerline intersection of SH 3

THENCE southeasterly along the centerline of SH 3 to the intersection of the Texas City/Dickinson city limit line;

THENCE northeasterly and southwesterly along the Texas City/Dickinson city limit line to a point of corner to the southerly Texas City/Dickinson city limit line;

THENCE westerly along a projection line of the southerly Texas City/Dickinson city limit line to the centerline intersection of SH 3;

THENCE northwesterly along the centerline of SH 3 to the Texas City/Dickinson city limit line;

THENCE southwesterly and northwesterly along the Texas City/Dickinson city limit line to the centerline intersection of Hughes Road;

THENCE westerly along the centerline of Hughes Road to the centerline intersection of IH 45, same being the place of beginning.

VOTING PRECINCT NO. 453

BEGINNING at the centerline intersection of G H & H Railroad and the Galveston/Harris County line, (centerline of Clear Creek);

THENCE southeasterly along the centerline of G H & H Railroad to the centerline intersection of League City Parkway (SH 96);

THENCE southeasterly along the centerline of League City Parkway (SH 96) to the centerline intersection of FM 270;

THENCE southeasterly along the centerline of FM 270 to the centerline intersection of FM 646 and Wyoming Ave.;

THENCE southeasterly along the centerline of Wyoming Ave. to the League City city limit line;

THENCE northeasterly along the League City city limit line to the centerline intersection of FM 1266;

THENCE northerly along the centerline of FM 1266 to the centerline intersection of Hewitt Road;

THENCE westerly along the centerline of Hewitt Road to the centerline intersection of FM 270;

THENCE northerly and northwesterly along the centerline of FM 270 to the centerline intersection of the Galveston/Harris County line (centerline of Clear Creek);

THENCE southwestly and northerly along the Galveston/Harris County line to its centerline intersection of G H & H Railroad, same being the place of beginning.

VOTING PRECINCT NO. 454

BEGINNING at the centerline intersection of IH No. 45 and the centerline of Calder Road;

THENCE northwest along the centerline of IH No. 45 to the centerline of Clear Creek same being the Galveston-Harris County line;

THENCE in an easterly direction along the Galveston-Harris County line also the centerline of Clear Creek to the centerline intersection of the G H and H Railroad;

THENCE southeasterly along the centerline of the G H and H Railroad to the intersection of the northern League City Pkwy R.O.W. line;

THENCE westerly along League City Pkwy R.O.W. line to the intersection of Hwy 3;

THENCE southerly on Hwy 3 to the centerline intersection of League City Pkwy;

THENCE westerly on League City Parkway to the centerline intersection of Calder Road;

THENCE southerly along the centerline of Calder Road to the centerline intersection of IH 45, the place of beginning.

VOTING PRECINCT NO. 455

BEGINNING at the intersection of the centerline of FM 518 and the centerline intersection of IH No. 45;

THENCE westerly and along the centerline of FM 518 to its intersection with a northerly projection of the north-south centerline of Ross Elementary School;

THENCE southerly along said projection of and along the north-south centerline of Ross Elementary School to its intersection with the east-west centerline of Ross Elementary School;

THENCE westerly along the east-west centerline of Ross Elementary School and a westerly projection thereof to its intersection with the centerline of The Landing Drainage Ditch;

THENCE southerly along the centerline of The Landing Drainage Ditch to its intersection with the centerline of the HL&P easement;

THENCE easterly along the HL&P easement to its intersection with the centerline of Hobbs Road;

THENCE southerly along the centerline of Hobbs Road to its intersection with the centerline of Brittany Bay Boulevard;

THENCE easterly along the centerline of Brittany Bay Boulevard to its intersection with the centerline of Calder Road;

THENCE northerly and along the centerline of Calder Road to its intersection with the centerline of IH No. 45;

THENCE northwesterly and along the centerline of IH No. 45 to its intersection with the centerline of FM 518, same being the place of beginning.

VOTING PRECINCT NO. 456

BEGINNING at the centerline intersection of FM 518 and FM 2351;

THENCE northeasterly along the centerline of FM 2351 to its centerline intersection of Clear Creek (Galveston/Harris County line);

THENCE southerly and easterly along the centerline of Clear Creek (Galveston/Harris County line) to its intersection with the League City/Friendswood city limit line;

THENCE southwesterly along the League City/Friendswood city limit line to the centerline intersection of FM 518;

THENCE northwesterly along the centerline of FM 518 to the centerline intersection of FM 2351, same being the place of beginning.

VOTING PRENCINCT NO.457

BEGINNING at the centerline intersection of FM 2351 and the Brazoria/Galveston County line;

THENCE northerly along the Brazoria/Galveston County line to its centerline intersection of Clear Creek (Galveston/Harris County line);

THENCE northeasterly, southeasterly along the centerline of Clear Creek (Galveston/Harris County line) to the centerline intersection of FM 2351;

THENCE southwesterly along the centerline of FM 2351 to its intersection with the Brazoria/Galveston County line, same being the place of beginning.

VOTING PRECINCT NO. 460

BEGINNING at the centerline intersection of FM 2351 and the Brazoria/Galveston County line;

THENCE southerly along the Brazoria/Galveston County line to the centerline intersection of Baker Road;

THENCE southeasterly along the centerline of Baker Road to the centerline intersection of Stonewall Pass;

THENCE southwesterly along the centerline of Stonewall Pass to the centerline intersection of Hackney;

THENCE southeasterly along the centerline of Hackney to the centerline intersection of Wilderness Trails;

THENCE westerly and southwesterly along the centerline of Wilderness Trails to its intersection with Daniel Circle;

THENCE from the intersection of Wilderness Trails and Daniel Circle in a southwesterly projection to the centerline of Chigger Creek;

THENCE southerly and westerly along the centerline of Chigger Creek to its centerline intersection of Windsong Lane;

THENCE easterly and southerly along the centerline of Windsong Lane to the centerline intersection of FM 528;

THENCE northeasterly along the centerline of FM 528 to the centerline intersection of FM 518;

THENCE northwesterly along the centerline of FM 518 to the centerline intersection of FM 2351;

THENCE southwesterly along the centerline of FM 2351 to its intersection with the Brazoria/Galveston County line, same being the place of beginning.

VOTING PRECINCT NO. 461

BEGINNING at the centerline intersection of FM 528 and the northeasterly line of Mission Estates Subdivision projected northwesterly;

THENCE southeasterly along the northeasterly line of the Mission Estates Subdivision and a southeasterly projection thereof to its intersection with the Friendswood city limit line;

THENCE southerly and westerly along the Friendswood city limit line to its intersection with the Galveston/Brazoria county line;

THENCE northwesterly, northeasterly along the Galveston/Brazoria county line to the centerline intersection of Baker Road;

THENCE southeasterly along the centerline of Baker Road to the centerline intersection of Stonewall Pass;

THENCE southwestery along the centerline of Stonewall Pass to the centerline intersection of Hackney;

THENCE southeasterly along the centerline of Hackney to the centerline intersection of Wilderness Trails;

THENCE easterly and southwestery along the centerline of Wilderness Trails to its intersection with Daniel Circle;

THENCE from the intersection of Wilderness Trails and Daniel Circle in a southwestery projection to the centerline of Chigger Creek;

THENCE southerly and westerly along the centerline of Chigger Creek to its centerline intersection of Windsong Lane;

THENCE westerly and southerly along the centerline of Windsong Lane to the centerline intersection of FM 528;

THENCE northeasterly along the centerline of FM 528 to the intersection with the northeasterly line of Mission Estates Subdivision projected northwesterly, same being the place of beginning.

VOTING PRECINCT NO. 462

BEGINNING at the intersection of the centerline of FM 528 and the centerline of FM 518;

THENCE southeasterly along the centerline of FM 518 to the southeasterly city limit line of the City of Friendswood;

THENCE southwesterly and northwesterly along the city limit line of the City of Friendswood to its intersection with a southeasterly projection of the northeasterly line of the Mission Estates Subdivision;

THENCE northwesterly along said projection and along the northeasterly line of Mission Estates Subdivision and along a northwesterly projection thereof to its intersection with the centerline of FM 528;

THENCE northeasterly along the centerline of FM 528 to its intersection with the centerline of FM 518, the same being the place of beginning.

VOTING PRECINCT NO. 464

**BEGINNING** at the intersection of the centerline of Clear Creek, same being the Galveston-Harris County line, and the League City-Friendswood City limit line;

**THENCE** southerly along said League City-Friendswood City limit line to its intersection with the centerline of FM 518;

**THENCE** easterly and along the centerline of FM 518 to its intersection with a southerly projection of the west line of the Creekside Elementary School;

**THENCE** northwesterly along said projection of and along with the west line of the Creekside Elementary School to the intersection with the centerline of the commons areas of the Creekside Elementary School;

**THENCE** northeasterly along the centerline of the commons areas of the Creekside Elementary School to its intersection with the centerline of the Creekside Elementary School;

**THENCE** southeasterly along the centerline of the Creekside Elementary School and a projection thereof to its intersection with the centerline of FM 518;

**THENCE** easterly along the centerline of FM 518 to its intersection with the centerline of IH-45;

**THENCE** northwesterly along the centerline of IH-45 to its intersection with the centerline of Clear Creek, same being the Galveston-Harris County Line;

**THENCE** westerly along the centerline of Clear Creek and its meanders, same being the Galveston-Harris County line to its intersection with the League City-Friendswood City limit line, same being the place of beginning.

VOTING PRECINCT NO. 471

BEGINNING at the intersection of the centerline of FM 646 and I-45;

THENCE northerly, easterly, southerly, westerly along I-45 and the city of League City streets and lines to the intersection of the centerline of the old Interurban corridor and FM 646 as shown on the voting pct map;

THENCE southerly, westerly, northerly and easterly along the city of League City streets and lines as shown on the voting pct map to the centerline of I-45;

THENCE northerly along I-45 to the place of beginning.

VOTING PRECINCT NO. 482

BEGINNING at the intersection of the centerline of FM 517 and the Galveston-Brazoria County Line;

THENCE easterly along the centerline of FM 517 to the intersection of census block line just west of Leisure Lane;

THENCE northerly and westerly along the census block line to the centerline intersection of McFarland Road;

THENCE northerly along the centerline of McFarland Road to its centerline intersection of American canal;

THENCE westerly and southwesterly along the centerline of American canal to its intersection with the easterly census tract line;

THENCE northerly along the census track line to its intersection with the League City/Friendswood city limits line;

THENCE northwesterly, southerly and westerly along the League City/Friendswood city limit line to its intersection with Galveston/Brazoria County line;

THENCE southeasterly along the Galveston/Brazoria County line to its centerline intersection of FM 517, same as being the place of beginning.

VOTING PRECINCT NO. 487

**BEGINNING** at the centerline intersection of Ervin Road and Calder Road;

**THENCE** easterly along a projection of the centerline of Ervin Road to its intersection with the centerline of IH 45;

**THENCE** northerly along the centerline of IH 45 to its intersection with the centerline of Calder Road;

**THENCE** southerly along the centerline of Calder Road to the centerline intersection of Brittany Bay Boulevard;

**THENCE** westerly along the centerline of Brittany Bay Boulevard to the centerline intersection of Hobbs Road;

**THENCE** northerly along the centerline of Hobbs Road to the centerline intersection of the HL & P easement;

**THENCE** westerly along the centerline of the HL & P easement and the westerly projected centerline of the HL & P easement to the centerline of the Landing drainage ditch between the Landing Subdivision and Brittany Bay Subdivision;

**THENCE** southerly along the centerline of the Landing drainage ditch to the centerline of Brittany Bay Boulevard;

**THENCE** westerly along the centerline and centerline extension of Brittany Bay Boulevard to the westerly boundary line of Galveston County Municipal Utility District No. 6;

**THENCE** southerly along the westerly boundary line of the Galveston County Utility District No. 6 to the centerline intersection of the American Canal;

**THENCE** easterly along the centerline of the American Canal and an extension thereof and the centerline of Ervin Road to its intersection with the centerline of Calder Road, same being the place of beginning.

VOTING PRECINCT NO. 488

BEGINNING at the centerline intersection of FM 518 and Cedar Gully;

THENCE northeasterly along FM 518 to the centerline of Creekside Elementary School;

THENCE northwesterly along the centerline of Creekside Elementary School to the centerline of the commons area of the Creekside Elementary School;

THENCE northeasterly along the centerline of the commons area of the Creekside Elementary School to the east side of the Creekside Elementary School;

THENCE southeasterly along the east side of the Creekside Elementary School to the centerline of FM 518;

THENCE northeasterly along the centerline of FM 518 to the east side centerline of Ross Elementary School;

THENCE southwestery along the east side centerline of Ross Elementary School to the centerline of the commons area of Ross Elementary School;

THENCE southwestery along the centerline of the commons areas of Ross Elementary School to the centerline of The Landing drainage ditch;

THENCE southerly along the centerline of The Landing drainage ditch to its centerline intersection of League City Parkway;

THENCE westerly along the centerline of League City Parkway to its intersection with the westerly boundary line of Galveston County Municipal District No. 6;

THENCE northerly along the westerly boundary line of Galveston County Municipal District No. 6 and its northerly projection to the centerline intersection of HL&P easement;

THENCE southwestery along the centerline of the HL&P easement to its intersection with the centerline of Cedar Gully;

THENCE northwesterly along the centerline of Cedar Gully to its centerline intersection of FM 518, same being place of beginning.

VOTING PRECINCT NO. 490

BEGINNING at the intersection of the centerline of FM 518 and FM 270;

THENCE easterly, southerly, northerly and westerly along the centerline of FM 518 and the City of League City streets and lines as shown on the voting pct map to the intersection of the centerline of Hewitt Street and FM 270;

THENCE northerly along FM 270 to the place of beginning.

**Notice of Publication**  
**Galveston County – Establishment of Election (Voting) Precinct Lines**  
**Effective Date – January 1, 2014**

**The State of Texas** §  
 §  
**County of Galveston** §

Pursuant to section 42.035 of the Texas Election Code Notice is given that the **Commissioners’ Court of Galveston County, Texas**, did, on the 5<sup>th</sup> day of February, 2013 at a regularly scheduled meeting revise, merge, split and create various Election (Voting) Precinct boundary lines as follows:

**1) The following election precincts have no changes in their boundary lines:**

Comm. Pct. 1	Comm. Pct. 2	Comm. Pct. 3	Comm. Pct. 4
150	221	301	401
151	228	312	454
	258	398	455
	263		462
	274		464
	275		487
	276		
	277		
	278		
	279		
	280		
	281		

**2) The following elections precincts are created and/or renumbered:**

**County Commissioner, Pct. 1**

- a) 101 merged into 103
- b) 102 merged into 103
- c) 103 enlarged to include a portion of 104, 101 and 102
- d) 104 - portion of 104 merged into 103
- e) 105 and 106 merged into 306
- f) 105.01 merged into 105
- g) 106.01 merged into 105
- h) 107 and 108 were merged into 308
- i) 115 renumbered to 315

- j) 115.02 merged into 218
- k) 118 merged into 218
- l) 118.03 merged into 316
- m) 146 enlarged to include a portion of 345.01
- n) 148 enlarged to include 149
- o) 148.03 merged into 343
- p) 149 merged into 148
- q) 149.03 merged into 343
- r) 159 enlarged to include 194
- s) 165 changed to conform to the League City city limit line
- t) 168 - part of 168 was merged into 345
- u) 172 enlarged to include 173
- v) 173 merged into 172
- w) 194 merged into 159
- x) 195 merged into 144
- y) 196 merged into 165 and 197
- z) 196.03 merged into 394
- aa) 197 enlarged to include 196
- bb) 199 merged into 142
- cc) 199.03 merged into 343

**County Commissioner, Pct. 2**

- a) 201 merged into 225 and 232
- b) 216 merged into 223
- c) 216.03 split between 309 and 316
- d) 217 merged into 218
- e) 217.03 merged into 316
- f) 219 enlarged to include portions of 227/24, 338.02 and 333.02
- g) 219 N/V merged into 331
- h) 220 - portion of 220 became 283
- i) 222 split between 223 and 224
- j) 222.03 merged into 316
- k) 223 enlarged to include 216
- l) 223.03 merged into 316
- m) 224 enlarged to include 222
- n) 225 enlarged to include 225.1 and a portion of 201
- o) 226 enlarged to include 226.03 and 226.01
- p) 226.03 merged into 226
- q) 227 realign to accommodate state representative lines

- r) 232 enlarged to include a portion of 201
- s) 232.03 merged into 330, 331 and 334
- t) 286 merged into 488
- u) 225.1 merged into 225 (no population)
- v) 226.1 merged into 226 (no population)
- w) 219 merged into 331 (no population)

**County Commissioner, Pct. 3**

- a) 302 merged into 330
- b) 309 - portion of 309 merged into 311
- c) 310 merged into 311
- d) 310 N/V merged into 105
- e) 311 enlarged to include 310 and portion of 309
- f) 311 N/V merged into 105
- g) 313 merged into 314
- h) 314 enlarged to include 313
- i) 314.02 merged into 218
- j) 329 merged into 330
- k) 330 enlarged to include 329, 329.1 and 302
- l) 331 enlarged to include 333
- m) 333 merged into 331
- n) 333.02 merged into 219
- o) 334 enlarged to include 334.1 and 334.02
- p) 334.02 merged into 334
- q) 335 merged into 338
- r) 336 enlarged to include 337
- s) 337 merged into 336
- t) 337.01 merged into 169
- u) 338 enlarged to include 335
- v) 338.02 was merged into 219
- w) 339 renumbered to 439 and enlarged to include 339.1 and a portion of 389
- x) 339.03 merged into 389
- y) 340 – portion of 340 merged into 399
- z) 340.04 merged into 471
- aa) 341 enlarged to include 344.03
- bb) 341.01 merged into 144
- cc) 341.04 merged into 439
- dd) 342 merged into 347, 343
- ee) 342.01 merged into 142

- ff) 343 enlarged to include 199.03, 149.03, 148.03, a portion of 342, 369 and 345
- gg) 344 enlarged to include 341.01 and renumbered to 144
- hh) 344.03 merged into 341
- ii) 345 enlarged to include 168 N/V
- jj) 345.01 was merged into 146 and 148
- kk) 347 enlarged to include a portion of 342 and 369
- ll) 347.01 merged into 142
- mm) 369 was split between 343 and 347
- nn) 389 – portion of 389 merged into 439
- oo) 389.03 renumbered to 389
- pp) 398.01 merged into 192
- qq) 398.04 merged into 453
- rr) 329.1 merged into 330 (no population)
- ss) 334.1 merged into 334 (no population)
- tt) 339.1 merged into 439 (no population)
- uu) 310 merged into 105 (no population)
- vv) 311 merged into 105 (no population)

**County Commissioner, Pct. 4**

- a) 402 merged into 482
- b) 452 renumbered to 152 and enlarged to include 491
- c) 453 enlarged to include 398.04
- d) 453.03 merged into 399
- e) 456 enlarged to include a portion of 485
- f) 457 lost a portion to 460 and gained a portion of 485
- g) 460 enlarged to include 484 and a portion of 457
- h) 461 enlarged to include 483
- i) 466 renumbered to 166
- j) 467 renumbered to 167 and enlarged to include 492
- k) 470 renumbered to 170
- l) 471 enlarged to include 340.04
- m) 471.03 merged into 399
- n) 482 enlarged to include 402
- o) 483 merged into 461
- p) 484 merged into 460
- q) 485 split between 457 and 456
- r) 488 enlarged to include 286
- s) 490 enlarged to include 493.04
- t) 491 merged into 152

- u) 492 merged into 167
- v) 493 renumbered to 193
- w) 493.04 merged into 490
- x) 454 merged into 399 (no population)

**3) That the total number of Election Precincts is now 83.**

A complete metes and bounds description of each of the above Precincts is filed for record in the Official Governmental Public Records of Galveston County, Texas

The effective date of the above changes is January 1, 2014.

**The Commissioners' Court of  
Galveston County, Texas**

Word/Voting Precincts §42.005 Short Form 2013

**EXHIBIT 12**

VIA EMAIL

Galveston County Judge Mark Henry

Commissioner Darrell Apffel

Commissioner Joe Giusti

Commissioner Stephen Holmes

Commissioner Ken Clark

October 29, 2021

Dear Judge Henry and Members of the Galveston County Commissioners Court:

As the Galveston County Commissioner Court prepares to redistrict our county commissioner, justice of the peace, and constable precincts, we write to convey the need for a fair, transparent, timely, and inclusive process in which all residents of Galveston County have a reasonable opportunity to participate.

As you are well aware, fair redistricting is fundamental to our representative democracy, and a transparent process is crucial to upholding public confidence in our system of government. But for this process to be truly fair and transparent, it must be inclusive such that all community members have a genuine opportunity to view this process and be heard, regardless of race, ability, or socioeconomic status. An accessible process is particularly crucial for historically-disenfranchised communities, such as our state's communities of color, which have been the targets of recent gerrymanders. A truly participatory and transparent redistricting process will contribute to better maps, engage citizens, and improve public trust and confidence in our democracy.

Accordingly, we have outlined requirements for an inclusive redistricting process. We based these guidelines on our collective advocacy for the right to fair representation for Texans. These guidelines are also informed by past redistricting experiences and best practices implemented in Texas and throughout the United States.

**Recommended Redistricting Criteria, prioritized in the following order:**

1. All districts must comply with the United States Constitution.

2. Districts must be reasonably equal in population with other districts for the same office except where deviation is required to comply with the federal Voting Rights Act (52 U.S.C. Sec. 10101 et seq.) or is allowable by law.
3. All districts must comply with the federal Voting Rights Act (52 U.S.C. Sec. 10101 et seq.).
4. Geographic Integrity
  - a. All districts must be geographically contiguous.
  - b. In order to preserve communities of interest, the geographic integrity of any local neighborhood or local community of interest shall be respected in a manner that minimizes their division to the extent possible without violating the requirements of any of the preceding subdivisions. COI's are contiguous populations that share common social and economic interests and that should be included within a single district for purposes of their effective and fair representation.
  - c. The geographic integrity of each municipality, local neighborhood, community of interest, and precinct must be respected in a manner that minimizes its division to the extent possible without violating the requirements of any of the preceding subdivisions of this subsection.
  - d. Communities of interest may not be determined based on relationships with political parties, incumbents, or political candidates.
5. The place of residence of any incumbent or political candidate may not be considered in the creation of a map. Districts may not be drawn for the purpose of favoring or discriminating against an incumbent, political candidate, or political party.

### **Implement a Redistricting Timeline That Allows Informed and Impactful Public Comment**

Galveston County's redistricting process must follow a timeline that allows for meaningful public comment. While the delay in release of the census data has altered the typical timeline, Galveston County can and should establish a timeline that allows for robust public input and, if needed, post-enactment dispute resolution.

A specific timeline should be created that delineates the steps leading to the adoption of a specific redistricting plan. Suggested steps in chronological order include:

1. Census data is received by the governmental entity, and within 10 business days the Census data and mapping software is made available to the public.

2. Begin first round of public hearings.
3. Preliminary maps and feedback/rationale report presented for public comment.
4. Second round of public hearings is held.
5. Final maps and a report that includes rationale for proposed maps, summary of feedback, and alternative maps is made available.
6. Deadline for approval of maps by jurisdiction.

### **Provide Genuine and Meaningful Opportunities For Public Comment**

Galveston County must afford fair opportunities for all residents to provide public input in the redistricting process. Furthermore, these opportunities must be genuine such that public comment is utilized in the map- drawing process. To ensure meaningful public comment this cycle, the County should ensure community engagement adheres to the following guidelines:

- 1. Provide a Simple Government Website For All Redistricting Information.** To facilitate public comment and participation, Galveston County should establish a simple and easily-accessible county government website that includes all redistricting information in one location, including meeting notices and livestream links, draft maps and related data and information, and a public comment portal. To prevent any fraudulent activity, the public comment should have a simple authentication process, such as a CAPTCHA checkbox.
- 2. Allow Public Comment Before Initial Draft Maps Are Drawn.** The County should receive public input before draft maps are drawn. This earlier input will ensure community input and concerns can be taken into consideration in drawing draft maps.
- 3. Allow Public Access and Comment on Draft and Revised Maps.** The County should release draft maps online for public comment, and should provide the public adequate time to review the draft maps and submit public comment before draft maps are revised.
- 4. Permit Written and Oral Public Comment.** The County should ensure all residents, including low-wage workers with demanding work schedules, have an opportunity to provide public comment by providing procedures for receiving written input via a public comment portal, email, and mail in addition to that conveyed orally during live hearings. Information about how residents can submit public comment should be provided contemporaneously with meeting notices.
- 5. Hold Accessible Public Hearings Throughout the County.** The County must provide live, in-person hearings in major cities and rural hubs throughout the

county in order to provide genuine opportunities for community members to provide live testimony.

- a. Galveston should hold at least 4 public input hearings, one in each county commissioner precinct.
- b. Hearing locations and facilities should be selected that are accessible by public transport and to those with disabilities.
- c. Public notice of any committee meeting, work session, or debate on any redistricting proposals formally considered by the deciding governmental entity should be posted at least a week in advance.
- d. In light of the ongoing COVID-19 realities, lawmakers must also provide remote options for viewing public hearings and providing public comment, and post a contact for those requiring technical assistance in accessing hearings remotely.
- e. After an initial plan and rationale report is presented, at least (2) public input hearings should be held to solicit public feedback on the proposed plan.
- f. A rationale report should be prepared for both the initial and final plans and should include disclosure, for each district in any formally considered redistricting proposal, of at least the following:
  - i. all data relevant to the plan or in any way descriptive of a population residing in a geographic area included in the plan – in a form reasonably usable by the public;
  - ii. any facts obtained from consulting experts relevant to the plan; and
  - iii. most recent information on voting age population, voter registration and election returns for precincts and census tracts, including detailed maps showing the information.

### **Ensure Transparency throughout the Redistricting Process**

#### **1. Perform All Map Drawing and Revising in Public View.**

All map drawing and revisions, including related redistricting discussions and meetings, should be performed in the public view and live-streamed. An explanation made available to the public should accompany any changes or revisions to draft maps, and all conversations or commentary by those engaged in the map-drawing process during any revisions should be audible to public observers. Maps should not be removed from the meeting room during the drawing or revising process except for secure storage. Final maps should be accompanied by a written justification for the districts chosen.

#### **2. Ensure Quality Video and Audio Broadcast in Public Meetings.**

All videos related to map-drawing provided for public consumption should be time

stamped and of a quality such that the public can view all relevant details of the proposed maps. Hearing notices should include a contact phone number for those observing the process to report technical issues. Should technical issues arise that prevent public observation, map drawing or revising should halt until those issues are resolved.

3. **Disclose All Third Parties Engaged in Redistricting.**

The County should immediately disclose all consultants, attorneys, or other third parties who will be participating in the redistricting process, to the extent already known, and going forward disclose additional participants within 24 hours of engagement . Participants should be introduced during public meetings if they are substantially involved in the process. This disclosure will further public confidence by ensuring that there are no conflicts of interest and that the key players are known to the public. The public should know who is participating in redistricting and why.

The districts you draw this year will shape Galveston County for the next decade. Only with these successive rounds of meaningful public input can the people of Galveston view the 2021 redistricting process as one that is fair, inclusive, and transparent.

Sincerely,

The League of Women Voters of the Bay Area

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