

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

DICKINSON BAY AREA BRANCH §
NAACP, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-117- JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

TERRY PETTEWAY, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-57-JVB
§ [Lead Consolidated Case]
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
v. § Civil Action No. 3:22-cv-93-JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

**NAACP PLAINTIFFS' RESPONSE IN OPPOSITION
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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I. NATURE AND STAGE OF PROCEEDINGS

Civil rights organizations and leaders Dickinson Bay Area Branch NAACP, Mainland Branch NAACP, Galveston Branch NAACP, Galveston LULAC Council 151, Edna Courville, Joe A. Compian, and Leon Phillips (“NAACP Plaintiffs” or “Plaintiffs”) filed this action in April 2022 to challenge the new County Commissioners precincts adopted by the Galveston County Commissioners Court in November 2021 (the “Enacted Plan”) as racially gerrymandered, adopted with discriminatory purpose, and unlawfully diluting the votes of Galveston’s Black and Latino voters. Having failed to secure dismissal of any of NAACP Plaintiffs’ claims under Rule 12, *see* Doc. 123, Defendants Galveston County, Galveston County Commissioners Court, and Dwight D. Sullivan now move for summary judgment (“the Motion” or “MSJ”) on two of Plaintiffs’ four claims: the results-based claim of vote dilution under Section 2 of the Voting Rights Act of 1965 (“VRA”) and racial gerrymandering under the Fourteenth Amendment of the U.S. Constitution.

II. SUMMARY OF THE ARGUMENT

Presented with conclusive evidence supporting Plaintiffs’ claims in discovery, Defendants seek to move the goalposts by asserting heightened and legally baseless hurdles for these claims in their Motion. But none of Defendants’ arguments refutes the reality that the Enacted Plan, which systematically dismantles the sole and long-standing majority-minority Commissioner Precinct in Galveston County, represents a textbook case of vote dilution and racial gerrymandering.

The Court must deny summary judgment on Plaintiffs’ Section 2 claim. Defendants’ argument that Section 2 does not protect minority coalitions defies binding precedent. Their

contention that Plaintiffs cannot satisfy *Gingles* I is untenable, given that it is not only possible, but in fact *easy* to draw a reasonably compact majority Black/Latino precinct based solely on traditional race-neutral principles. Defendants also fail to lodge coherent criticism against several of Plaintiffs' illustrative maps. At most, they ask this Court to make credibility determinations and resolve evidentiary disputes that are plainly inappropriate on summary judgment.

As to *Gingles* II and III, the unchallenged statistical evidence shows that a supermajority of Black/Latino voters in Galveston vote for the same candidates, and a supermajority of Anglos bloc vote in opposition to defeat minority-preferred candidates in every single precinct of the Enacted Plan. This is bolstered by qualitative evidence of racial bloc voting. Unable to effectively rebut this evidence, Defendants instead engage in a parade of fruitless arguments: improperly attempting to shift their burden of showing race-neutral considerations instead explain Galveston's dramatic racial polarization onto Plaintiffs, then relying on unreliable statistical evidence, all while ignoring Plaintiffs' evidence that race plays an inextricable role in Galveston politics.

Summary judgment is also inappropriate on the racial gerrymandering claim. Defendants have enacted a textbook racial gerrymander by cracking Galveston's Black and Latino population nearly equally between all four Enacted Commissioners' Precincts. Their post hoc justifications in the form of inadmissible hearsay to point to race-neutral criteria cannot explain the contours of the Enacted Plan. Rather, the evidence shows that race unconstitutionally predominated. The Motion should be denied.

III. STATEMENT OF FACTS

A. Galveston County's Black and Latino Residents Form a Community of Interest.

Galveston County's growing minority populations primarily reside in communities along I-45 from Dickinson to the City of Galveston and east to Galveston Bay, roughly coterminous with Commissioners Court Precinct 3 as it existed for decades. Doc. 176-2 ¶¶ 38, 81 (Cooper Report). Due to the enduring legacy of discrimination and systemic racism, Galveston County's Black and Latino residents lag behind Anglo residents in a variety of socioeconomic measures, including income, education, employment, health, and housing. *Id.* at ¶ 40; *see also* Ex. 1 at 22–30 (Burch Report); Ex. 2 at 262:18–263:5 (Mainland NAACP/Rice-Anders Dep.); Ex. 3 at 97:18–99:19 (Armstrong Dep.). For example, Black and Latino residents face unique challenges in getting medical care that Anglos do not, which is exacerbated by a distrust of healthcare systems due to historic mistreatment. Ex. 4 at 195:26–197:16 (LULAC/Compian Dep.); Ex. 5 at 47:4–49:8 (Galveston NAACP Dep.); Ex. 2 at 77:5–78:19 (Mainland NAACP/Rice-Anders Dep.); Ex. 6 at ¶¶ 4–5 (Compian Decl.). Natural disasters disproportionately impact the Black and Latino community, which often receives less government recovery funding. Ex. 4 at 216:11–217:24 (LULAC/Compian Dep.); Ex. 1 at 29 (Burch Report); Ex. 6 at ¶ 6 (Compian Decl.). Similarly, Black and Latino residents are treated unequally with regard to routine infrastructure maintenance. Ex. 5 at 203:5–205:21 (Galveston NAACP Dep.).

Black and Latino residents also face unique barriers to equal political representation. In the recent past, this Court directed the County in a 1992 consent order to create two majority-minority justice of the peace (“JP”) and constable precincts, *see Hoskins v.*

Hannah, 3:92-cv-12, ECF No. 61 (S.D. Tex. Aug. 19, 1992), which were subsequently eliminated. Ex. 7 at ¶ 4 (Quintero Decl.). The County came under another consent decree in 2007 requiring it to comply with the VRA and other obligations to provide Spanish language assistance to voters, *United States v. Galveston County*, 3:07-cv-00377, ECF No. 5 (S.D. Tex. July 2007), yet there are continuing issues with insufficient Spanish language resources. Ex. 6 at ¶ 12 (Compian Decl.). Latino voters have faced increasing intimidation and misinformation when voting in recent years, which has taken place in an environment of generally deteriorating race relations. *Id.* at ¶ 11; Ex. 8 at 197:1–198:5 (Courville Dep.); Ex. 7 at ¶¶ 6–11 (Quintero Decl.). And in 2011, the County failed to gain Department of Justice (“DOJ”) preclearance for new Commissioners Court and JP/constable precinct maps (drawn using the same consultant, Dale Oldham, as in 2021) that would have diluted minority voting power. Doc. 176-7 (2012 DOJ Objection). Minority voters have also protested the proposed closure of polling places in predominantly Black and Latino neighborhoods. Ex. 8 at 165:11–169:14 (Courville Dep.); Ex. 9 (Exhibit 12 to Courville Dep.); Ex. 6 at ¶ 9 (Compian Decl.). Further, there is evidence of explicit racial discrimination against candidates and campaigners of color, racial appeals in campaigns, and less-explicit modes of exclusion such as campaign materials not translated into Spanish.¹

¹ See, e.g., Ex. 7 at ¶ 7 (Quintero Decl.); Ex. 22 at 29–35 (Stephens-Dougan Report); Ex. 4 at 176:8–179:16 (LULAC/Compian Dep.); Ex. 24 at 165:3–7 (Johnson Dep.); Ex. 16 at 32:11–16 (Giusti Dep.); Ex. 10 at 318:4–319:21 (Dickinson Bay Area NAACP/Lofton Dep.); Ex. 14 at 25:9–22 (Nov. 12 Hr’g Tr.).

To combat these challenges, Plaintiffs, long-standing community leaders and organizations, work collaboratively on shared issues critical to Galveston’s Black and Latino community.² Community members rely on Commissioner Stephen Holmes, who had been the only minority representative on the Commissioners Court since 1999, to champion the issues important to them and do not expect the same level of support from Commissioners under the newly Enacted Plan.³ Having a minority representative at Commissioners Court has also been critical to fostering Black and Latino leaders at other levels of county and municipal government within the Precinct 3 community. Ex. 4 at 91:4–25 (LULAC/Compian Dep.); Ex. 6 at ¶ 14 (Compian Decl.). Even Galveston County minority residents who do not live within Commissioner Holmes’s former precinct, “Benchmark” Precinct 3, turn to him for advice and see him as a leader representing their interests. Ex. 10 at 332:19–21 (Dickinson Bay Area NAACP/Lofton Dep.); Ex. 5 at 90:9–22 (Galveston NAACP Dep.); Ex. 11 at 24:11–18 (Williamson Dep.).

B. The Commissioners Court Dismantles Benchmark Precinct 3 in the Enacted Plan.

The Enacted Plan cracks Galveston’s Black and Latino community, once largely included in Benchmark Precinct 3, among all four of its new Commissioners Precincts. *See*

² *See, e.g.*, Ex. 8 at 34:9–15, 35:14–36:4, 40:9–17, 194:8–15, 207:14–20 (Courville Dep.) (education, social services, working with LULAC); Ex. 25 at 25:12–25, 31:15–32:3 (Phillips Dep.) (policing and housing); Ex. 4 at 59:18–19, 172:11–174:7, 213:11–215:7 (LULAC/Compian Dep.) (shared membership in community organizations; infrastructure and healthcare access); Ex. 5 at 16:8–20, 61:20–62:5 (Galveston NAACP Dep.) (2012 redistricting and collaboration with LULAC); Ex. 10 at 69:7–70:18 (Dickinson Bay Area NAACP/Lofton Dep.) (business collaboration with LULAC); Ex. 6 at ¶¶ 4–10 (Compian Decl.) (COVID, disaster relief, school funding, electoral access).

³ *See, e.g.*, Ex. 8 at 112:6–24, 199:16–200:9 (Courville Dep.); Ex. 4 at 92:1–17 (LULAC/Compian Dep.); Ex. 25 at 33:22–34:15 (Phillips Dep.); Ex. 11 at 21:22–25, 23:18–24:18, 64:6–20 (Williamson Dep.); Ex. 6 at ¶¶ 13–17 (Compian Decl.); Ex. 7 at ¶¶ 8–11 (Quintero Decl.).

App'x A-3 (2021 Enacted Plan with Benchmark Precinct 3 Overlay); Doc. 176-2 ¶ 17 (Cooper Report). The Commissioners Court adopted this plan in a redistricting cycle markedly different from past cycles, in a process plagued by Defendants' delay and lack of transparency. With no prior public disclosure, Defendants once again hired Oldham as a redistricting consultant as early as April 2021, Ex. 12 at 136:7–10 (Henry Dep.), but thereafter failed to take any action until shortly before the November 13, 2021 statutory deadline. In 2011, the Commissioners Court presented Census data results and two initial proposals, then held five public hearings throughout the County to solicit input, before a final meeting presenting new proposals that incorporated changes based upon public comment. Ex. 13 (2011 Preclearance Letter at 10). By contrast, in 2021 the Commissioners Court failed to announce any Census data results, and did not hold any public hearings, propose any maps, or provide timelines or even an opportunity for public comment until October 29, 2021, just two weeks before the November 13, 2021 statutory deadline. Ex. 12 at 159:19–22, 160:1–5, 163:21–164:25, 290:9–17 (Henry Dep.); Ex. 1 at 14–17 (Burch Report). On November 12, the Commissioners Court held just one meeting for public comment *and* a vote, meaning there was no opportunity for members to publicly consider or make changes to draft maps pursuant to public commentary. Ex. 14 at 26:13–27:5 (Nov. 12 Hr'g Tr.). In further contrast to prior standard practice, the Commissioners Court failed to publicly discuss or disclose redistricting criteria that might be used to draw or adopt new maps. Ex. 12 at 126:20–25, 128:1–4 (Henry Dep.); Ex. 15 at 112:6–114:15 (Apffel Dep.).

Instead, Defendants assiduously avoided any public discussion of their intentions toward redrawing precinct lines. They deliberately flouted the requirements of the Texas

Open Meetings Act, Tex. Gov. Code § 554.143, by meeting with Oldham and other redistricting consultants in groups of two or fewer Commissioners behind closed doors starting in September. Ex. 12 at 214:19–22, 215:1–4 (Henry Dep.); Ex. 15 at 129:4–18, 162:10–21 (Apffel Dep.). And they later tried to hide any evidence of their behind-the-scenes deliberations through wholesale and improper privilege assertions. *See, e.g.*, Doc. 177 (Ord. Granting Mot. to Compel). Though they disclaimed redistricting with partisan goals, *see, e.g.*, Ex. 12 at 257:3–7 (Henry Dep.); Ex. 15 at 193:6–8 (Apffel Dep.); Ex. 16 at 138:19–25 (Giusti Dep), the Commissioners Court and Oldham have not specifically disclaimed racial motivations, and they did receive racial breakdowns of Galveston County and each precinct in each map proposal. *See*, Doc. 176-32 (Oldham Decl.); Ex. 17 at 12 (“% BNH VAP” and “% HISP VAP” columns in “Pop Pivot” tab); Ex. 18 at 3 (“Hispanic” and “Black” columns).

On October 29, 2021, the County first posted images of two map proposals, devoid of demographic or other data analysis, along with an online comment portal. Ex. 12 at 227:24–229:1 (Henry Dep.). Map 1 closely resembled the map the DOJ objected to in 2011, *compare* App’x A-4 with Ex. 13 at 22 (2011 Preclearance Letter, Ex. C), and Map 2 (the Enacted Plan) made dramatic changes to the Benchmark Plan. *See* App’x A-3; Ex. 12 at 217:22–218:2 (Henry Dep.). The comment portal did not provide a meaningful way for constituents to voice concern—Commissioners Court members reviewed only a handful of the public comments, Ex. 15 at 190:16–191:1 (Apffel Dep.); Ex. 12 at 273:19–276:2 (Henry Dep.); Ex. 16 at 135:6–21 (Giusti Dep.), and many residents, especially Black and Latino senior citizens, have difficulty accessing the internet. Ex. 10 at 166:11–23

(Dickinson Bay Area NAACP/Lofton Dep.).

Then, with the minimum 72-hour notice (at most) and little fanfare, the Commissioners Court scheduled a special meeting on November 12, 2021 to hear public comment and vote on the maps. *See* Ex. 1 at 17–19 (Burch Report). Rather than the larger County seat used for regular meetings, this lone public redistricting hearing was held at the smaller League City Annex building, at the time under construction. *See id.* The room was so small, there was no room for Holmes at the dais, and he sat by himself at a small white table below.⁴ Despite hearing from Commissioner Holmes and many Galveston County residents, including Plaintiffs and their members, about the discriminatory effects of both proposed maps, Judge Mark Henry, Commissioner Darrell Apffel, and Commissioner Joe Giusti voted in favor of the Enacted Plan (Map 2), without any significant discussion or rationale. Judge Henry mentioned only a tally of public comments received online supporting Map 2 over Map 1, a tally which failed to account for the hundreds of comments rejecting both maps, including those that criticized them as racially discriminatory. *See* Ex. 14 at 61:14–62:10 (Nov. 12 Hr’g Tr.); Ex. 1 at 20–21 (Burch Report). As discussed in the reports of Plaintiffs’ expert William Cooper (Docs. 176-2, 176-29), Defendants’ post hoc rationales cannot justify a whole-scale remapping of every precinct and the destruction of the only precinct that preserved minorities’ ability to elect the candidate of their choice.

⁴ *See* Galveston County Commissioners Court Special Meeting, at 10:05 (Nov. 12, 2021), [https://livestream.com/accounts/21068106/events/6315620/videos/227296657?origin=stre\[...\]c-404c0628-140000-155bc7a4b821a6&acc_id=30028131&medium=email](https://livestream.com/accounts/21068106/events/6315620/videos/227296657?origin=stre[...]c-404c0628-140000-155bc7a4b821a6&acc_id=30028131&medium=email).

IV. STANDARD OF REVIEW

Summary judgment is only appropriate when there is no genuine issue of material fact and the moving party is entitled to judgment as a matter of law. Fed. R. Civ. P. 56(c). On a motion for summary judgment, courts “refrain from making credibility determinations or weighing the evidence.” *Turner v. Baylor Richardson Med. Ctr.*, 476 F.3d 337, 343 (5th Cir. 2007). Instead, “the court must consider all evidence in the light most favorable to the nonmoving party, and resolve all reasonable doubts about the facts in favor of the nonmoving party.” *Wiley v. Bay City Indep. Sch. Dist.*, No. 3:20-CV-119, 2022 WL 4368155, at *2 (S.D. Tex. Sept. 21, 2022) (internal citations omitted).

V. ARGUMENT

A. Defendants’ Motion as to Plaintiffs’ VRA Section 2 Claim Should Be Denied.

Plaintiffs may prove unlawful vote-dilution under Section 2 of the VRA by satisfying three preconditions: (1) the minority population “is sufficiently large and geographically compact to constitute a majority in a single-member district” (“*Gingles I*”); (2) the minority group or coalition is “politically cohesive” (“*Gingles II*”); and (3) “the white majority votes sufficiently as a bloc to enable it . . . usually to defeat the minority’s preferred candidate” (“*Gingles III*”). *Thornburg v. Gingles*, 478 U.S. 30, 50–51 (1986). If the preconditions are met, the Court must determine whether, under the “totality of the circumstances,” “the political process is equally open to minority voters.” *Id.* at 79.

Here, the analyses of Plaintiffs’ experts conclusively show that Galveston’s Black and Latino voters satisfy all three *Gingles* preconditions. Put simply, Galveston’s Black and Latino voters have had both the opportunity and track record of electing their shared

candidate of choice to the Commissioners Court for decades, and it is undisputed that the Enacted Plan will “cancel out their ability to” do so in the future if it is not struck down by this Court. *Id.* at 48. Defendants ignore both the law and facts related to all three preconditions and fail even to address the “totality of the circumstances.” *Id.* at 79. Their Motion should be denied as to this claim.

i. Section 2 of the VRA Protects Coalition Districts.

Defendants’ argument that Section 2 does not protect minority coalitions (MSJ at 22–24)⁵ should be summarily rejected. As Defendants acknowledge, the Fifth Circuit has long held that minority coalitions are protected under Section 2. *Id.* at 17; *see also, e.g., Campos v. City of Baytown*, 840 F.2d 1240, 1244 (5th Cir. 1988). The Fifth Circuit’s holdings remain binding on this Court. *See Campbell v. Sonat Offshore Drilling*, 979 F.2d 1115, 1121 n.8 (5th Cir. 1992). As this Court aptly noted, “[a]pplying Section 2 to protect minority coalitions is necessary and appropriate to ensure full protection of the Fourteenth and Fifteenth Amendments rights.” Doc. 125 at 13–14 (internal quotations omitted).

ii. Galveston County’s Black and Latino Populations Satisfy Gingles I.

Defendants’ request for summary judgment on *Gingles* I is baseless. All expert evidence adduced to date demonstrates that Galveston County’s Black and Latino populations are “sufficiently large and geographically compact to constitute a majority in a single-member district,” *Gingles*, 478 U.S. at 50, specifically, here, a Citizen Voting Age Population (“CVAP”) majority. This is true “tak[ing] into account ‘traditional districting

⁵ All page numbers of docketed briefs and orders cited refer to the numbers inserted by the CM/ECF system.

principles such as maintaining communities of interest and traditional boundaries.” *Abrams v. Johnson*, 521 U.S. 74, 92 (1997) (quoting *Bush v. Vera*, 517 U.S. 952, 977 (1996)). Thus, it is indisputable that “the minority has the potential to elect a representative of its own choice” in a single-member district. *Grove v. Emison*, 507 U.S. 25, 40 (1993).

The illustrative maps drafted by Plaintiffs’ expert William Cooper, who has over three decades of redistricting experience and has served as an expert in approximately 50 federal court voting rights cases, prove that a majority-Black/Latino precinct could “be *easily constructed* by adhering to only race-neutral traditional redistricting principles.” Doc. 176-2 ¶¶ 2, 21 (emphasis added). The three examples he provides—out of many possible iterations—each follow race-neutral traditional redistricting criteria: Map 1, a “least-change” from the Benchmark Map to equalize populations, *id.* at ¶¶ 81–82; Map 2, a “least-change” that both equalizes populations and creates a coastal precinct, *id.* at ¶¶ 87–88; and Maps 3 and 3A, which prioritize placing all of Bolivar Peninsula, Pelican Island, and Galveston Island in a single precinct, among other traditional, race-neutral criteria. *Id.* at ¶¶ 92–93; Doc. 176-29 ¶ 35; App’x A (compilation of maps). Even under the most onerous proposed interpretations of *Gingles* I, Plaintiffs satisfy this precondition.

In seeking summary judgment on this issue, Defendants advance arguments that lack purchase in the record or misapply the relevant law:

I. Defendants’ arguments that Cooper failed to consider traditional redistricting principles in his plans and instead drafted “racial gerrymanders” are directly contradicted by the sworn statements Cooper provided in his reports describing the race-neutral criteria he followed. *See* Doc. 176-2 ¶¶ 81, 86–87, 91–92, 95; Doc. 176-29 ¶¶ 7, 29–34. Cooper

categorically rejected having subordinated traditional redistricting criteria to draw a majority-minority district in any of his plans. *See* Ex. 19 at 100:10–25 (Cooper Dep.). Defendants ignore this testimony, and instead rely on vague, conclusory, and unsupported statements about varying education and home ownership levels (MSJ at 29) and precinct population statistics (*id.* at 32) unrelated to the criteria Cooper applied to draw his illustrative maps. Further, resolving Defendants’ unfounded contentions would at least require the Court to assess Cooper’s evidence and weigh his credibility, which is inappropriate on summary judgment. *Reeves v. Sanderson Plumbing Prods., Inc.*, 530 U.S. 133, 150 (2000) (“[A court] may not make credibility determinations or weigh the evidence” in ruling on a motion for summary judgment.).

2. Defendants’ argument that the illustrative plans join “disparate and distinct minority communities” is belied by the reasonable compactness of the illustrative maps. *See* Doc. 176-2 ¶¶ 86, 91, 95 (Cooper Report). For example, Defendants’ own expert compiled tables of compactness scores that show Cooper’s Map 3 creates an illustrative Precinct 3 that has a higher (and thus better) Reock compactness score than *each* of the Enacted Map’s precincts. *See* Doc. 176-8 at 16 (Owens Report, Table 10, “Enacted Map” and “Cooper Illus 3” rows). Defendants cannot credibly argue that this *Gingles* I demonstrative district is not reasonably compact while defending their own gerrymander.

3. Given the reasonable compactness of the illustrative plans, Defendants’ attempts to argue Galveston’s Black and Latino populations are nonetheless “distant” and “disparate” fail. This is contradicted by the actual population distribution of the County, in which Black and Latino residents are “concentrated in communities along I-45 extending

from Dickinson to the City of Galveston and east to Galveston Bay,” and thus “roughly coterminous with Benchmark Precinct 3” and one other precinct. Doc. 176-2 ¶ 38 (Cooper Report). Defendants’ assertion that Plaintiffs’ maps “extend[] considerable distances . . . often splitting voting precincts in the process” (MSJ at 31) rings hollow given that three of Cooper’s maps split *fewer* populated voting precinct splits than the Enacted Plan, and all of Cooper’s illustrative Precinct 3s span either comparable or smaller distances than precincts in the Enacted Plan.⁶ As for their repeated reliance on *Sensley v. Albritton*, that case concerned a smaller county of 22,803 persons split among 9 districts, and in fact supports Plaintiffs’ arguments. 385 F.3d 591, 593 (5th Cir. 2004). The challengers there were accused of improperly “disrupting the core of the preexisting electoral district (a black majority district),” as well as “separat[ing] distinct communities and disrupt[ing] relationships between incumbents and constituents, which had existed over the years and continued to exist under the [county’s] new plan.” *Id.* at 597–98. Here, *Plaintiffs* are the ones seeking to preserve the core of districts, maintain communities of interest, and continue relationships between incumbents and their long-standing constituents, which *Defendants* improperly disrupted via the Enacted Plan.

4. The in-depth, granular analysis Cooper performed shows definitively that Galveston’s Black and Latino population shares common attributes across all socioeconomic markers. Cooper examined these factors both across the County and among

⁶ The 2021 Enacted Plan has four populated VTD splits, Ex. 26 at 4 (Cooper Ex. F-3C), while Cooper Map 1 has just one, *id.* at 14 (Cooper Ex. I-3C), and Cooper Maps 3 and 3A have just 3, *id.* at 24 (Cooper Ex. K-3C) and 29 (Cooper Rebuttal Ex. E-3C).

its municipalities and Census Designated Places with populations greater than 2,500. Doc. 176-2 ¶¶ 39–43. Defendants do not dispute that Anglos “outpace African Americans and Latinos across a broad range of socioeconomic measures,” including income, education, employment, and housing. *Id.* at ¶ 40. Instead, they harp on minor variances among populations in League City, an irrelevant fact given that disparities “persist even in League City” and, in any event, “none of [Cooper’s] illustrative plans place substantial portions of League City in Precinct 3.” Doc. 176-29 ¶ 13 (Cooper Rebuttal).⁷

5. Next, Defendants wrongly assert that any plan based upon Benchmark Precinct 3 is automatically a racial gerrymander. The use of traditional boundaries as a starting point is a well-recognized race-neutral redistricting criterion. *See Abrams*, 521 U.S. at 92 (any *Gingles* I analysis “should take into account . . . communities of interest and traditional boundaries”) (citation omitted). Precinct 3 has existed for decades in a substantially similar form. *See* Ex. 13 (2011 Preclearance Letter, Ex. D). This, paired with the common demographic and socioeconomic factors of residents in this area, indicates it is an “established community of interest.” Doc. 176-2 ¶ 81 (Cooper Report). Unrebutted testimony confirms the shared interests of communities living on those portions of

⁷ Defendants also attempt to fabricate a requirement that Cooper somehow analyze socioeconomic factors of populations by precinct—but fail to specify what this analysis might entail much less cite to precedent or authority requiring it. MSJ at 41–42. The *Wisconsin Legislature v. Wisconsin Elections Commission* decision they rely on merely held a party cannot rely upon “generalizations to reach the conclusion that the preconditions were satisfied.” 142 S. Ct. 1245, 1250 (2022). It provides no support for rejecting Cooper’s municipality analysis or requiring the unspecified “precinct” analysis Defendants imply is required. Defendants’ own expert used even bigger units, Galveston’s four Census County Divisions, in an unreliable analysis using boundaries that have no modern relevance to redistricting. *See* Doc. 176-29 ¶ 9 (Cooper Rebuttal). Cooper’s more granular socio-economic analysis by municipality, Exhibit D to his report, can be downloaded online at http://www.fairdata2000.com/ACS_2015_19/Galveston/.

Galveston Island, the mainland, and in the unincorporated areas of Dickinson that comprise the Benchmark Precinct 3. *See supra* Section III.A; *Robinson v. Ardoin*, 37 F.4th 208, 219 (5th Cir. 2022). It is thus not only reasonable but *expected* that map-drawers would use a least-change approach. In fact, that appears to be how Defendants’ alternative Map 1 was drawn. *See, e.g.*, Ex. 20 (Oct. 16, 2021 1:55am email discussing “minimum change scenario”); Ex. 12 at 352:13–16 (Henry Dep.) (“[a]bsolutely” considering Map 1 as a “viable option”); Doc. 176-32 at ¶ 15 (Oldham Decl.) (concluding that Map 1 “complied with the U.S. Constitution and the [VRA]”).

But even if the original boundaries of Benchmark Precinct 3 were drawn conscious of race, that would not impact Cooper’s least-change illustrative plans. Defendants misstate the appropriate legal standard, asserting that “[i]f race is *considered* when drawing a district (as Plaintiffs do in their illustrative plans), there must be a ‘strong basis in evidence’ for doing so.” MSJ at 27 (citing *Bethune-Hill v. Va. State Bd. of Elections*, 580 U.S. 178, 194 (2017)). But *Bethune-Hill* makes clear, it is racial *predominance*, not mere consideration, that requires this showing. 580 U.S. at 193–94. Cooper subordinated his use of Benchmark Precinct 3’s boundaries to other race-neutral criteria in his least-change approaches to Illustrative Maps 1 and 2. Doc. 176-2 ¶¶ 81, 87. This approach renders irrelevant the case upon which Defendants primarily rely, *Jacksonville Branch of the NAACP v. City of Jacksonville*; there, legislative statements showed that “maintaining high BVAP percentages in the minority access districts was the criterion that could not be compromised.” No. 3:22-cv-493, 2022 WL 7089087, at *46 (M.D. Fla. Oct. 12, 2022). Defendants ignore that “[r]acial consciousness in the drawing of illustrative maps does not

defeat a *Gingles* claim.” *Robinson*, 37 F.4th at 222.

In any event, Defendants never assert that race was a predominating factor in Cooper’s Illustrative Maps 3 and 3A, which are not least-change plans and thus not susceptible to Defendants’ misplaced concerns regarding racial gerrymandering. Moreover, neither of these illustrative maps includes the components of the Benchmark Precinct 3 that Defendants criticize. *Compare* MSJ at 38–39 (criticizing Benchmark Precinct 3’s “narrow point of contiguity” and 3-precinct split of Galveston Island) *with* App’x A-7 and A-8 (Cooper Maps 3 and 3A).

As Defendants have no legitimate complaints against Cooper’s Illustrative Maps 3 and 3A, and these maps show that Galveston’s Black and Latino populations are sufficiently numerous and geographically compact to form a majority CVAP in a single district, Plaintiffs have satisfied *Gingles* I. Defendants’ arguments to the contrary ignore the record or are legally unsupportable. At best, Defendants have shown disputes as to material issues of fact that preclude summary judgment.

iii. There Is Legally Significant Racially Polarized Voting in Galveston County.

In requesting summary judgment on the second and third *Gingles* preconditions, Defendants completely elide the applicable legal standards for assessing racially polarized voting (“RPV”), and otherwise engage in a series of strawman arguments.

Plaintiffs satisfy the *Gingles* II precondition by showing that “a significant number of minority group members usually vote for the same candidates.” *LULAC v. Abbott*, 604 F. Supp. 3d 463, 495 (W.D. Tex. 2022) (quoting *Gingles*, 478 U.S. at 56) (emphasis added). “The necessary size of the majority. . . . is a district-specific inquiry.” *Id.* at 495 n.22. For

coalition districts, the Fifth Circuit assesses Black and Latino voters “as a whole”—*i.e.*, as one “minority group” under *Gingles*—to determine “whether the minority group together votes in a cohesive manner[.]” *Campos v. City of Baytown*, 840 F.2d 1240, 1245 (5th Cir. 1988). Statistical evidence is typically important, but it is “not a *sine qua non* to establishing cohesion,” *Brewer v. Ham*, 876 F.2d 448, 454 (5th Cir. 1989), and “lay witness testimony concerning cooperation between the minority groups” is relevant. *Perez v. Abbott*, 274 F. Supp. 3d 624, 669 (W.D. Tex. 2017), *rev’d and remanded on other grounds*, 138 S. Ct. 2305 (2018). The third *Gingles* factor is present when the “white majority votes sufficiently as a bloc to enable it . . . usually to defeat the minority’s preferred candidate.” *Gingles*, 478 U.S. at 90. “When both minorities and Anglos vote in blocs, courts conclude that voting is ‘racially polarized’ and typically hold that both the second and third preconditions have been met.” *LULAC v. Abbott*, No. 3:21-CV-259-DCG-JES-JVB, 2022 WL 17683191, at *3 (W.D. Tex. Dec. 14, 2022).

Defendants do not challenge the numerical accuracy of NAACP Plaintiff Expert Dr. Kassra Oskooii’s ecological inference (“EI”) or election performance analysis. Ex. 21 at 11:8–11, 45:25–46:10 (Alford Dep.). And this analysis shows legally significant RPV.

Dr. Oskooii’s EI analysis plainly satisfies the *Campos* and *Gingles* standards for minority cohesion. His district-specific analysis of data from 25 recent elections shows that Galveston’s Black/Latino voters overwhelmingly support a candidate of choice in every election in each of Cooper’s illustrative plans at average rates above 87%. *See* Doc. 176-48 ¶¶ 61–62, Figures 13, 14. A “significant” majority of the Black/Latino population “as a whole” therefore usually votes for the same candidates and is cohesive. *Campos*, 840 F.2d

at 1243, 1245 (citing *Gingles*, 478 U.S. at 56). Similarly, the white bloc analysis shows that Anglos vote in opposition to minority-preferred candidates at average rates of about 87, 77, 88, and 85 percent in the four enacted precincts. Doc. 176-48 ¶ 56, Figures 11, 12 (Oskooii Report). Dr. Oskooii concludes there is “very clear and highly consistent Anglo bloc voting in each of the four Commissioner Precincts.” *Id.* at ¶ 56. Defendants do not dispute that this severe white bloc vote defeats every minority-preferred candidate in every enacted Precinct. *See id.* at ¶ 71, Figure 17.

In addition to EI, Dr. Oskooii’s reconstituted election results independently confirm the legal significance of RPV in Galveston. This analysis is important because it is based on actual election results, not estimated vote shares. The percentage of Anglo voters in an Enacted Precinct corresponds directly on a 1:1 basis with the severity of loss for minority-preferred candidates. For example, the newly-enacted Precinct 3 has the *highest* Anglo CVAP percentage (71.6%) in the Enacted Plan, and it performs the *worst* for minority-preferred candidates, with “clear and definitive” 35-point margin losses. *See supra* n.7; Doc. 176-48 ¶ 71 (Oskooii Report). The second most Anglo district performs second worst, and so on.⁸ By contrast, under any demonstrative precinct with a majority Black/Latino CVAP, the minority-preferred candidates win. *Id.* at ¶ 75, Figure 18. Galveston’s RPV therefore exemplifies the circumstances described in *Gingles*: that “minority and majority voters consistently prefer different candidates” such that “the majority, by virtue of its numerical superiority, will regularly defeat the choices of minority voters,” thus denying

⁸ Compare Doc. 176-2 at ¶ 58 (Cooper Report, Fig. 11 of Enacted Plan’s CVAP levels) with Doc. 176-48 at ¶ 71 (Oskooii Report, Fig. 17 of Enacted Plan’s performance analysis).

minorities an equal opportunity to elect representatives of their choice. 478 U.S. at 48. Since Defendants cannot dispute the clear evidence of RPV, they instead seek to move the goalposts, asking this Court to apply inflated standards that lack a basis in applicable law.

1. Defendants argue that cohesion breaks down when Black and Latino voters are analyzed separately, but this implies an inquiry that courts reject and is also unsupported by the facts. *See Campos*, 840 F.2d at 1245, n.6 (rejecting separate cohesion inquiries as statistically fraught and focusing on “the minority group as a whole”). Instead, the only important intra-group determination is that “black-supported candidates receive a majority of the Hispanic . . . vote [and] Hispanic-supported candidates receive a majority of the black . . . vote . . . in most instances[.]” *Brewer*, 876 F.2d at 453. So “[i]f the evidence were to show that the Blacks vote against a Hispanic candidate, or vice versa, then the minority group could not be said to be cohesive.” *Campos*, 840 F.2d at 1245. But Defendants do not argue, and could not show, that Galveston’s Black and Latino voters oppose each other. Indeed, Dr. Oskooii’s analysis shows that Black and Latino voters consistently prefer the same candidates by decisive supermajorities. *See* Doc. 176-48 at ¶¶ 40–52. Accordingly, the Court must consider Black and Latino voters as a “whole,” as Dr. Oskooii has.

2. Although primary election data has little utility in RPV analysis (a fact Defendants ignore), Dr. Oskooii’s primary election analysis also supports cohesion. Primary analysis is less informative or reliable than general election analysis because of low turnout, the auxiliary role primaries play in the political process, and the closer ideological positions of primary candidates. *See* Doc. 176-48 ¶ 24; *accord Texas v. United States*, 887 F. Supp. 2d 133, 174–75 (D.D.C. 2012), *vacated on other grounds and*

remanded, 570 U.S. 928 (2013); *Patino v. City of Pasadena*, 230 F. Supp. 3d 667, 694 (S.D. Tex. 2017); *Perez v. Pasadena Indep. Sch. Dist.*, 958 F. Supp. 1196, 1225 (S.D. Tex. 1997), *aff'd*, 165 F.3d 368 (5th Cir. 1999). The value of primaries or other very low turnout elections can also be limited because, as data becomes sparser, it becomes less informative, which makes estimation more difficult and potentially less precise. In this context, ecological analysis relies on applying statistical models to aggregate demographic and election data for a unit, like a voting precinct. When only a tiny percentage of voters in a unit turn out, it is less certain that some minimum portion of the vote is attributable to a particular demographic group.⁹ Indeed, Defendants’ expert Dr. John Alford has recognized issues with ecological analysis of low turnout elections. *See Pasadena Indep. Sch. Dist.*, 958 F. Supp. at 1220.

Notwithstanding those caveats, Dr. Oskooii’s analysis shows that Black and Latino voters prefer the same candidates an estimated 90% of the time in primaries. Doc. 176-48 ¶¶ 63–65. Further, even Dr. Alford’s “replicated” analysis of Dr. Trounstine’s recent primaries shows that Black and Latino voters in Democratic primaries shared the same first choice candidate in 7 out of 8 contests. Doc. 176-47 at 18. Accordingly, even primary analysis supports that Black and Latino voters are cohesive and should be treated as a single minority group protected by Section 2. *See Campos*, 840 F.2d at 1245 (“The key is the

⁹ *Cf. Alabama State Conf. of NAACP v. Alabama*, 612 F. Supp. 3d 1232, 1276 (M.D. Ala. 2020) (describing as an example of the method of bounds in EI a hypothetical “where a precinct has 100 voters, of which 75 are black and 25 are white, and the black candidate receives 80 votes. In this hypothetical, at least 55 of the black voters (80 minus 25) voted for the black candidate and at most all 75 did.”). However, if, in that *Alabama* example, only 10% of registered voters show up at the polls (10 total votes), there is no reason that Anglos could not make up 100% of that very small number of voters despite being only 25% of the voting population. Thus, the data is potentially far less informative.

minority group as a whole.”). Furthermore, analysis of Democratic primaries in Galveston holds *no* probative value to evaluating white bloc voting because, as Dr. Alford acknowledges, it is “clear” most Anglos voting in primary elections do so in the Republican primaries. Ex. 21 at 93:23–94:3; *see also* Doc. 176-49 ¶ 8 (Oskooii Rebuttal).

3. Defendants’ implication that cohesion exists only when the constituent minority groups have electoral variances of less than 10% has no basis in law or logic. *See* MSJ at 44. The case they rely on, *LULAC v. Clements*, 999 F.2d 831, 864–65 (5th Cir. 1993), stands for the opposite conclusion. The Fifth Circuit determined that Black-Latino cohesion *did exist* in counties where Black-Latino voting percentages differed by more than 10% because—as is the case here—“in those counties a significant number of blacks and Hispanics usually voted for the same candidates.” *Clements*, 999 F.2d at 864–65. Defendants cite no precedent for declining to treat a minority coalition as a group because different-sized majorities of the constituent parts voted for the same candidate.

Besides lacking legal foundation, bright-line rules such as 10% variance or Dr. Alford’s unsupported 75% cohesion suggestion¹⁰ make little practical sense. Such rules would in part be premised on the notion that one can pinpoint in every election a precise voting percentage of every demographic group. But not every ecological estimate is equally informative given that various factors in the data can lead to different levels of precision.

¹⁰ Of note, this is not the first time Dr. Alford has manufactured a threshold for a party seeking to prevent a Section 2 challenge. *See Lopez v. Abbott*, 339 F. Supp. 3d 589, 609 (S.D. Tex. 2018) (Dr. Alford “advocated a higher threshold for finding legally significant minority political cohesion. (recommending requiring 80 to 90%) . . . [but] did not articulate any factual or methodological reason for his opinion and he agreed that Hispanics voted cohesively for their preferred candidate. His testimony that over 70% was required for compliance with *Gingles* is not corroborated in the briefing.”) (internal citation omitted).

It was exactly this type of concern that led the *Campos* court to reject discrete cohesion inquiries for each constituent part of a minority group. 840 F.2d at 1245 n.6. Rather, courts do, and should, look at all relevant evidence to determine whether “a significant number of minority group members usually vote for the same candidates” and the white majority votes as a bloc “that normally will defeat the *combined* strength of minority support.” *Gingles*, 478 U.S. at 56 (emphasis added). When all relevant evidence is considered, “Galveston County does not present a borderline case.” Doc. 176-48 at ¶ 12 (Oskooii Report).

4. Finally, Defendants ignore the ample qualitative evidence of cohesion, which itself requires denying their Motion given that “*Gingles* allows minority voters to prove their political cohesiveness even in the absence of statistical evidence of racial polarization.” *LULAC v. Clements*, 986 F.2d 728, 743 (5th Cir. 1993), *on reh’g*, 999 F.2d 831 (5th Cir. 1993). In Galveston, Black and Latino communities are tied together through a common history of discrimination which has led to facing shared socio-economic and political barriers. *See supra*, III.A; V.A.ii. In the face of this, Black and Latino communities have actively organized and advocated together through the political process to address the issues that are uniquely important to their minority communities and support candidates who are responsive to their needs. *Id.* But by drawing every single Black and Latino voter into majority Anglo districts, Defendants construct a map that allows them to “ignore [these] interests without fear of political consequences . . . leaving the minority effectively unrepresented.” *Gingles*, 478 U.S. at 48 n.14 (internal citation omitted).

In sum, there is ample statistical and qualitative evidence that Black and Latino voters in Galveston are politically cohesive, defeating Defendants’ Motion.

iv. Galveston’s White Bloc Voting Cannot Be Dismissed as Mere Partisanship.

Defendants’ contention that *Gingles* is not satisfied because “Plaintiffs cannot show that race—not partisan politics—accounts for . . . White-bloc voting,” MSJ at 55, fails legally and factually. The Fifth Circuit has squarely rejected placing an evidentiary burden in the first instance on Plaintiffs to negate the role of partisanship, *Teague v. Attala County*, 92 F.3d 283, 290 (5th Cir. 1996), and this Court rightfully rejected Defendants’ attempt to impose this burden at the pleading stage. Doc. 123 at 34–35. Defendants double-down on this legal fallacy by arguing that “Plaintiffs have a negative causative requirement” to disprove partisanship and “cannot carry their burden.” MSJ at 50. But Plaintiffs have satisfied *Gingles* with evidence of significant RPV, and thus it is now Defendants’ burden to show that these voting patterns are best explained by non-racial phenomena; the Court must then weigh all available evidence. *See, e.g., Teague*, 92 F.3d at 290; *Lopez v. Abbott*, 339 F. Supp. 3d 589, 604 (S.D. Tex. 2018); *Rodriguez v. Harris County*, 964 F. Supp. 2d 686, 760 (S.D. Tex. 2013), *aff’d*, 601 F. App’x 255 (5th Cir. 2015). Because partisanship and race can be correlated, the ultimate inquiry requires a “searching practical evaluation of the past and present reality . . . [and] courts *should not* summarily dismiss vote dilution claims in cases where racially divergent voting patterns correspond with partisan affiliation.” *Clements*, 999 F.2d at 860–61 (cleaned up, emphasis added).

Defendants incorrectly believe they can simply invoke the “partisan” mantra to dismiss extreme racial bloc voting without explaining what they actually mean by “partisan politics.” MSJ at 49. But Defendants have a burden to explain how partisanship in the County is not tinged by racial considerations. *See Clements*, 999 F.2d at 861 (“[W]e do not

indulge in the hopeful yet unrealistic assumption that decisions to support particular political parties among black and white voters in all cases rest on issues other than race.”). “A longstanding finding in political science is that most Americans do not think of politics in coherent, ideological ways. Rather . . . , research indicates that people tend to think about parties in terms of [social] groups,” including racial groups. Ex. 22 at 7 (Stephens-Dougan Report) (internal citations omitted). Defendants do not explain what race-neutral consideration they contend partisan labels represent, much less offer any affirmative evidence to counter the unambiguous evidence of racially divergent voting patterns. Their expert concedes that he did not conduct any analysis of voter motivations, nor did he analyze whether any variable, including voters’ partisan identification or political ideology (which he concedes are distinct and not necessarily correlated concepts), is more correlated with voting patterns in Galveston than the race of the voters. Ex. 21 at 19:9–13, 20:9–12, 77:15–78:7, 83:24–84:20 (Alford Dep.). He engages only in speculatively re-characterizing Plaintiffs’ evidence.¹¹ Defendants thus have failed to adduce evidence that would meet their burden, and certainly have not established as a matter of law that race is not a significant explanation for voting patterns.

Factually, there is ample evidence in Galveston of racial polarization that cannot be rebutted or explained by mere partisanship. The case on which Defendants singularly rely,

¹¹ Several other courts have criticized, and declined to adopt, Dr. Alford’s method of analysis. See *Robinson v. Ardoin*, 605 F. Supp. 3d 759, 840–41 (M.D. La.), cert. granted before judgment, 142 S. Ct. 2892 (2022) (finding “Dr. Alford’s opinions border on *ipse dixit*. . . . unsupported by meaningful substantive analysis and [] not the result of commonly accepted methodology in the field.”); *Alpha Phi Alpha Fraternity Inc. v. Raffensperger*, 587 F. Supp. 3d 1222, 1306–07 (N.D. Ga. 2022) (collecting cases criticizing Dr. Alford and his approach, including five Texas courts finding in favor of minority plaintiffs on *Gingles II* and *III* contrary to Dr. Alford’s testimony).

Clements, primarily rested its partisanship finding on two factors not present here: (1) white voters constituted a majority of both political parties and “30-40% of white voters consistently support Democrats, making white Democrats more numerous than all of the minority Democratic voters combined,” and (2) “both political parties, and especially the Republicans, aggressively recruited minority lawyers to run on their party’s ticket” meaning voters were “not infrequently voting against candidates sharing their respective racial or ethnic backgrounds.” 999 F.2d at 861. By contrast, in Galveston, there is minimal crossover voting by Anglo voters: Dr. Oskooii’s analysis shows that Anglos in Galveston support Democratic candidates at percentages in the low teens—less than half the rate as in *Clements*. See Doc. 176-48 ¶¶ 40–43, 47–48, 61–62. And across 20 years, Defendants point to just two instances of white Republicans supporting minority candidates: the 2018 election between Ted Cruz and Beto O’Rourke and a 2004 race for County Commissioner. See MSJ at 46, 50–51.¹²

As Dr. Oskooii points out, there is not a single popularly elected Republican in Galveston County government that outwardly presents as a person of color, whereas every elected Democrat presents as a person of color. Doc. 176-49 ¶ 7. When minority success within a political party is practically nonexistent, this “is a strong indication that partisan choice does not explain the inability of white voters to support the Latino-preferred

¹² Besides being outdated, the 2004 race has little relevance here given that more Anglos in Galveston supported the Democratic party at that time. See Ex. 15 at 22:21–23:7, 23:17–20 (Apffel Dep.). Anglos shifting to the Republican party after 2010 corresponds with the increasing racialization of political parties after Barack Obama’s 2008 election. See Ex. 22 at 22–24 (Stephens-Dougan Report) (describing research finding that “[s]ince 2008, . . . many racially resentful whites have outright fled the Democratic party”).

candidate, but is more consistent with racial block voting.” *Rodriguez*, 964 F. Supp. 2d at 776–77; *cf.* Ex. 3 at 57:3–7 (Armstrong Dep.) (“For the NAACP leadership and for the LULAC leadership, there are probably no opportunities to – to rise to leadership in the Republican party.”); Ex. 7 at ¶ 5 (Quintero Decl.).

As for the 2014 County Judge race between Republican Mark Henry and Independent Bill Young, Defendants err when they contend this shows partisan considerations overtaking racially polarized voting. MSJ at 51. Rather, it is an example of the statistical peril of analyzing anomalous elections without proper context. Election results from 2014 show that roughly 16% fewer voters participated in the County Judge race (53,360) compared to other contested countywide elections (~62,000), and Judge Henry received fewer votes than other countywide Republican candidates. Ex. 23 (2014 General Election Returns).¹³ Given that (1) Judge Henry received fewer total votes than other countywide Republicans and (2) Latinos were otherwise voting at rates over 70% for Democratic candidates in 2014, *see* Doc. 176–4 at 17 (Barreto Report, App’x A Table 1), the logical conclusion would not be that most Latinos suddenly switched to support Republican Henry, but rather that most did not vote in that race and some supported Young.

Additionally, Defendants ignore entirely the report of Dr. LaFleur Stephens-Dougan, a political scientist and expert in race, ethnicity, and politics who studies the role of race in partisanship. Noting that most Americans no longer espouse overtly racist

¹³ These election results were produced by Defendants in a difficult-to-read technical format. They are also available at <https://www.galvestonvotes.org/home/showpublisheddocument/7305/637595458881430000> in a more accessible format. For the Court’s convenience, Plaintiffs request judicial notice of the Galveston County website’s publication of those results. *See Cicalese v. Univ. of Texas Med. Branch*, 456 F. Supp. 3d 859, 871 (S.D. Tex. 2020) (“[G]overnmental websites are proper sources for judicial notice.”).

opinions, she describes historical strategies, gold-standard surveys, and sociological experiments that show how political actors sometimes deploy seemingly racially-neutral language to activate engrained racial considerations and stereotypes in voters. Ex. 22 at 14–24 (Stephens-Dougan Report). And she offers local examples that illustrate the deep connection between race and partisan identification, opining that “Galveston County, Texas fits the well-accepted academic model of racial and partisan alignment,” *id.* at 35, where Republican voters view the Democratic party as a “vehicle for advancing distinctively minority interests.” *Clements*, 999 F.2d at 860–61. Her unrebutted report is precisely the kind of non-statistical, “analytical evidence of voter polarization” that courts use to inform racially polarized voting patterns, *see Robinson v. Ardoin*, 605 F. Supp. 3d 759, 845 (M.D. La.), *cert. granted before judgment*, 142 S. Ct. 2892 (2022), and blocks Defendants’ attempts to undermine Plaintiffs’ conclusive statistical evidence of RPV.

Finally, lay testimony illustrates the role of racial considerations in white bloc voting. Residents think of race and party as interchangeable proxies for each other in Galveston. Ex. 8 at 212:25–214:6 (Courville Dep.); Ex. 11 at 81:16–24 (Williamson Dep.); Ex. 3 at 49:22–50:11 (Armstrong Dep.); Ex. 16 at 30:7–24, 284:14–21 (Giusti Dep.); *cf. Patino*, 230 F. Supp. 3d at 703–04. Whether or not the Anglo-elected officials are responsive to minority communities “is intimately related” to the legal significance of bloc voting because if there is bloc voting, it “allows those elected to ignore [minority] interests without fear of political consequences.” *Clements*, 999 F.2d at 857. Here there is evidence that Galveston’s Anglo/Republican elected officials are unaware of issues facing or are unresponsive to the minority community. *See, e.g., supra*, III.A; Ex. 8 at 214:7–215:13

(Courville Dep.); Ex. 16 at 285:16–287:5 (Giusti Dep.); Ex. 15 at 86:4–88:2, 300:3–6 (Apffel Dep.); Ex. 12 at 66:3–16 (Henry Dep.); Ex. 7 at ¶¶ 8–11 (Quintero Decl.) Evidence also shows explicit and implicit racial discrimination in campaigns and barriers to political participation for communities of color. *See supra*, III.A.

In sum, Defendants misstate the framework for assessing the legal significance of racial bloc voting when race and partisanship are highly correlated. But under the appropriate standards, Plaintiffs’ evidence shows that the racially divergent voting patterns in Galveston are closely linked to race and satisfy the *Gingles* preconditions.

B. The Court Should Deny Defendants’ Motion for Summary Judgment on Plaintiffs’ Claim of Racial Gerrymandering.

The Enacted Plan is a “textbook example of a racial/ethnic gerrymander,” cracking Galveston’s substantial Black and Latino population nearly equally between all four Enacted Precincts. Doc. 176-2 ¶¶ 17–18 (Cooper Report). Defendants do not (and cannot) dispute the demographic reality of their plan, which contravenes the very purpose of the Fourteenth Amendment’s prohibition on a government “‘separat[ing] its citizens into different voting districts on the basis of race’” without “sufficient justification.” *Bethune-Hill v. Va. State Bd. of Elections*, 580 U.S. 178, 187 (2017) (quoting *Miller v. Johnson*, 515 U.S. 900, 911 (1995)). Importantly, a bizarre shape is not required to show a district is racially gerrymandered, because even a compact district can be gerrymandered when its lines are “considered in conjunction with [the district’s] racial and population densities.” *Miller*, 515 U.S. at 913, 916. And race may unconstitutionally “predominate even when a reapportionment plan respects traditional principles.” *Bethune-Hill*, 580 U.S. at 189.

Evidence adduced in discovery makes clear there are material factual disputes as to whether “race was the predominant factor motivating the legislature’s decision to place a significant number of voters within or without a particular district.” *Cooper v. Harris*, 581 U.S. 285, 291 (2017) (quoting *Miller*, 515 U.S. at 916). Defendants’ assertions about the map-drawing process reinforce that such disputes exist to preclude summary judgment.

Defendants would have this Court believe that they promulgated and followed a discrete set of redistricting criteria, not one of which had a racial aspect. But the record here establishes the opposite. In a deviation from established past practice, the Commissioners Court never adopted or disclosed redistricting criteria during the 2021 process. Ex. 12 at 94:20–22, 125:22 (Henry Dep.). As a result, the County electorate had no insight into what factors would be considered in drawing or adopting new precinct lines.

Defendants now argue they applied a defined set of criteria in drafting and adopting the Enacted Plan, citing their counsel’s hearsay interrogatory responses that set forth a list of six purported criteria. *See* Doc. 176-34. But deposition testimony from County Judge Henry and Commissioners Apffel and Giusti reveal this interrogatory response to be no more than a *post hoc* fabrication. Each witness testified under oath they did not request, apply, or even fully understand these criteria. Ex. 12 at 249:16–20 (Henry Dep.); Ex. 15 at 136:5–137:21 (Apffel Dep.); Ex. 16 at 53:2–21 (Giusti Dep.). And Judge Henry, who certified those interrogatory responses, stated unequivocally he depended on counsel to draft them without consulting the Commissioners who voted for the Plan. Ex. 12 at 247:21–23 (Henry Dep.). These interrogatory responses are inadmissible hearsay that contradict sworn testimony and have no bearing on the criteria actually applied in drawing the

Enacted Plan. *See Bethune-Hill*, 580 U.S. at 189–90 (“The racial predominance inquiry concerns the actual considerations that provided the essential basis for the lines drawn, not *post hoc* justifications the legislature in theory could have used but in reality did not.”).

Here is what that evidence at trial will show: The factors that were *actually* considered in drafting and adopting the Enacted Plan render its configuration inexplicable unless race predominated in its drafting. When the government seeks to achieve particular goals, “the ‘predominance’ question concerns *which* voters the legislature decides” to move to achieve those goals. *Ala. Legislative Black Caucus v. Alabama*, 575 U.S. 254, 273 (2015). Here, “it was just plain as day obvious” it was not necessary to wholly dismantle benchmark Precinct 3 and crack Galveston’s Black and Latino populations to achieve Defendants’ goals. Ex. 19 at 85:2–4 (Cooper Dep.).

Equalizing populations was the predominant consideration, according to Judge Henry and Commissioners Apffel and Giusti. Ex. 12 at 249:16–20 (Henry Dep.); Ex. 15 at 208:25–209:4 (Apffel Dep.); Ex. 16 at 53:11–19 (Giusti Dep.). But the Enacted Plan “did not follow a simple redistricting solution to population imbalances resulting from the 2020 Census,” *i.e.*, shifting two VTDs to balance populations, and instead was an unnecessary “full-scale remap,” which eliminated the sole existing majority-minority district while “fundamentally altering the geographic population configurations of all four commissioner precincts.” Doc. 176-2 ¶¶ 53, 81, 83 (Cooper Report). In any event, “legislative effort[] to create districts of approximately equal population” is “taken as a given” and not a factor that weighs against race predominating in a given plan. *Alabama*, 575 U.S. at 271–72.

Judge Henry also testified that the overriding preference driving his adoption of the Enacted Plan was a desire for a coastal precinct. Ex. 12 at 175:2–11 (Henry Dep.). But as Cooper Illustrative Maps 2, 3, and 3A all show, this consideration also did not require the cracking of Galveston’s Black and Latino populations. *See* Doc. 176-2 ¶ 54; Doc. 176-29 at 12. Nor would the more minor considerations, such as residency addresses, mentioned by Commissioner Giusti. Ex. 16 at 138:19–25 (Giusti Dep.).

Even the *post hoc* criteria developed by counsel in interrogatory responses did not require the systematic cracking of the Black and Latino population in the Enacted Plan. As noted above, Cooper’s illustrative plans prove that ensuring reasonable compactness, limiting VTD and municipal splits, and respecting incumbency were all possible without cracking Black and Latino communities. *See supra* Section V.A.ii. And as for the final criterion that any plan should “reflect[] the partisan composition of Galveston County,” Doc. 176-34 at 9, Judge Henry, Commissioner Apffel, and Commissioner Giusti all disclaimed having any partisan aims in voting for the Enacted Plan. *See, e.g.*, Ex. 12 at 257:3–7 (Henry Dep.); Ex. 15 at 193:6–8 (Apffel Dep.); Ex. 16 at 138:19–25 (Giusti Dep.). And even if it were considered, “reflect[ing] the partisan composition” of the County would favor preserving at least one Democratic-leaning precinct, given Galveston tends to vote just above 60% Republican. *See, e.g.*, Doc. 176-28; Ex. 12 at 43:7–12 (Henry Dep.).

Additional evidence confirms that Defendants “subordinated traditional race-neutral districting principles . . . to racial considerations.” *Bethune-Hill*, 580 U.S. at 187 (quoting *Miller*, 515 U.S. at 916). For example, the Enacted Plan completely disregarded the well-established traditional criteria of respecting traditional boundaries, preserving core

districts, and ensuring consistency in representation between constituents and incumbents. *See* App’x A-3 (2021 Enacted Plan with Benchmark Precinct 3 Overlay); *see also, e.g., Sensley v. Albritton*, 385 F.3d 591, 598 (5th Cir. 2004) (rejecting plans that “ignor[ed] that traditional municipal boundary and disrupt[ed] the core of the preexisting electoral district”). Defendants also decided not to take any measures to assess, much less prevent, unconstitutional vote dilution. To the contrary, Judge Henry and Commissioner Apffel testified that they specifically disfavored Precinct 3 because they viewed it as a racial gerrymander. Ex. 12 at 241:8–19 (Henry Dep.); Ex. 15 at 263:21–265:15 (Apffel Dep.). But there is no evidence they took steps to confirm this fact or even to assess whether preservation of a majority-minority district was required. *See Abbott v. Perez*, 138 S. Ct. 2305, 2335 (2018) (rejecting state’s explanation when it could “point[] to no actual ‘legislative inquiry’ that would establish the need for its manipulation of the racial makeup of the district”).

Defendants misrepresent Plaintiffs’ claims and applicable law in arguing that “maintaining prior district boundaries to preserve a minority-opportunity district that was drawn on the basis of race is, in itself, a form of unconstitutional racial sorting.” MSJ at 56. First, this is not an accurate description of Plaintiffs’ racial gerrymandering claim, which alleges that race predominated in the drawing of the Enacted Plan, not just that a failure to work from benchmark Precinct 3 was itself unconstitutional. NAACP First Am. Compl. at ¶ 150, No. 3:22-cv-117, Doc. 38. Second, neither case on which Defendants rely supports that a least-change approach here would be unconstitutional. As noted above, the court in *Jacksonville Branch of the NAACP* held that “maintaining high BVAP percentages

in the minority access districts was the criterion that could not be compromised,” despite public commentary and reports from Black voters and leaders that packing Black voters was not necessary for their ability to vote for the candidate of their choice. 2022 WL 7089087, at *8–23, 46. *Walters v. Boston City Council* is even less on point, as there the “the concept of ‘core retention’ was not a focus of discussion” by the City Council, which instead focused on racial quotas such as “60% of non-white or ideally pushing it higher.” No. CV 22-12048-PBS, 2023 WL 3300466, at *10, 12 (D. Mass. May 8, 2023). Here, by contrast, Defendants were aware that Black and Latino voters needed a district similar to Precinct 3 to have any chance of electing their candidate of choice based on their own political experience, the prior objections by the Department of Justice, and public comments. *See, e.g.*, Ex. 12 at 225:23–226:1 (Henry Dep.). And Defendants cite no direct evidence that the configuration of Benchmark Precinct 3 was due to a racial quota or race predominating in its drafting.

Instead, the evidence shows that Defendants intentionally crafted a map with the predominating feature of dismantling Precinct 3 and cracking Black and Latino voters among all four new precincts when such a result was otherwise unnecessary to achieve Defendants’ stated goals. That Defendants sought to do this is all the more striking given that the County failed preclearance in the prior redistricting cycle due to potential discriminatory purpose in diluting minority voting power in Precinct 3. Doc. 176-7 (2012 DOJ Objection). Seen in context, the fact that each of the four Commissioners precincts in the Enacted Plan had roughly the same percentage of Black and Latino CVAP in them strongly suggests use of a racial target, one of the most direct forms of evidence of a racial

gerrymander. *See, e.g., Cooper*, 581 U.S. at 300; *Alabama*, 575 U.S. at 267.

Even the specific boundaries of the Enacted Plan reveal that cracking minority voters at the voting precinct level predominated over other considerations. Despite a purported goal of minimizing voting precinct splits, the Enacted Plan split longtime voting precinct 336, which has the highest Black CVAP in the County and is considered a strong community of interest. *See* Ex. 17 (Galveston Blocks Data tab showing highest Black population in Precinct 336); Ex. 8 at 167:9–22 (Courville Dep.); Ex. 14 at 16:3–13 (Nov. 12 Hr’g Tr.). “Splitting precincts, especially when doing so is contrary to a legislature’s stated redistricting criteria, can support a finding of discriminatory intent.” *LULAC v. Abbott*, 617 F. Supp. 3d 622, 632 (W.D. Tex. 2022).

Thomas Bryan’s declaration that he was never instructed to consider racial demographic data to draft the Enacted Plan does not help Defendants’ case. Bryan’s analyses contain detailed racial data and, in the analyses sent to the Commissioners Court, color-coded shading indicated where the highest percentages of minorities live in each map proposal. Ex. 17 at 12 (“Pop Pivot” tab). Courts have discredited testimony that a mapdrawer used only partisan data when drawing maps when the mapdrawer gave “self-contradictory testimony” that indicated actual use of race. *Cooper*, 581 U.S. at 315. Here, too, the Court should be suspicious of Bryan’s stated process and objectives and, at the very least, must give the non-moving party the benefit of any doubt.

Moreover, Bryan did not work in isolation, but rather at the direction of Dale Oldham and others who have not disclaimed relying on race. *See generally*, Doc. 176-32 (Oldham Decl.). Furthermore, Oldham fed Bryan information based on conversations with

members of the Commissioners Court, as well as third parties, all of which determined what kind of draft maps would be offered as options. *Id.* at ¶¶ 8–14; Doc. 176–36 ¶ 8 (Bryan Decl.). And not only did Judge Henry and the Commissioners understand the racial geography of their County while giving this input, *see, e.g.*, Ex. 12 at 53:22–54:20 (Henry Dep.), Oldham also received detailed racial data, broken down to the block level as well as by draft Commissioners’ precincts when he was advising on the map configurations. *See* Ex. 17; Ex. 18. Oldham cannot reasonably deny understanding the racial demographics of Galveston County, given his experience with the 2011 redistricting cycle. *See S.C. State Conf. of NAACP v. Alexander*, No. 21-CV-03302-MGL-TJH-RMG, 2023 WL 118775, at *2 (D.S.C. Jan. 6, 2023) (“[C]laims that an experienced map drawer did not consult racial data in drawing the plan ring ‘hollow[.]’”) (quoting *Cooper*, 581 U.S. at 314).

Given this direct and circumstantial evidence, Plaintiffs can make a “showing sufficient to support” an allegation of race-based decision-making that could overcome even the presumption of good faith in redistricting. *Miller*, 515 U.S. at 915. It is up to the trial court to “perform a ‘sensitive inquiry into[.]’” whether race predominated in the Plan’s development and adoption. *Prejean v. Foster*, 227 F.3d 504, 509 (5th Cir. 2000) (quoting *Hunt v. Cromartie*, 526 U.S. 541 at 546 (1999)). Accordingly, this issue cannot be appropriately determined on summary judgment.

VI. CONCLUSION

For the reasons set forth above, Defendants’ Motion for Summary Judgment should be denied in full.

Respectfully submitted this 2nd day of June, 2023.

/s/ Hilary Harris Klein

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 2, 2023, the foregoing document, its appendix, and its exhibits were filed electronically (via CM/ECF), and that all counsel of record were served by CM/ECF.

/s/ Hilary Harris Klein

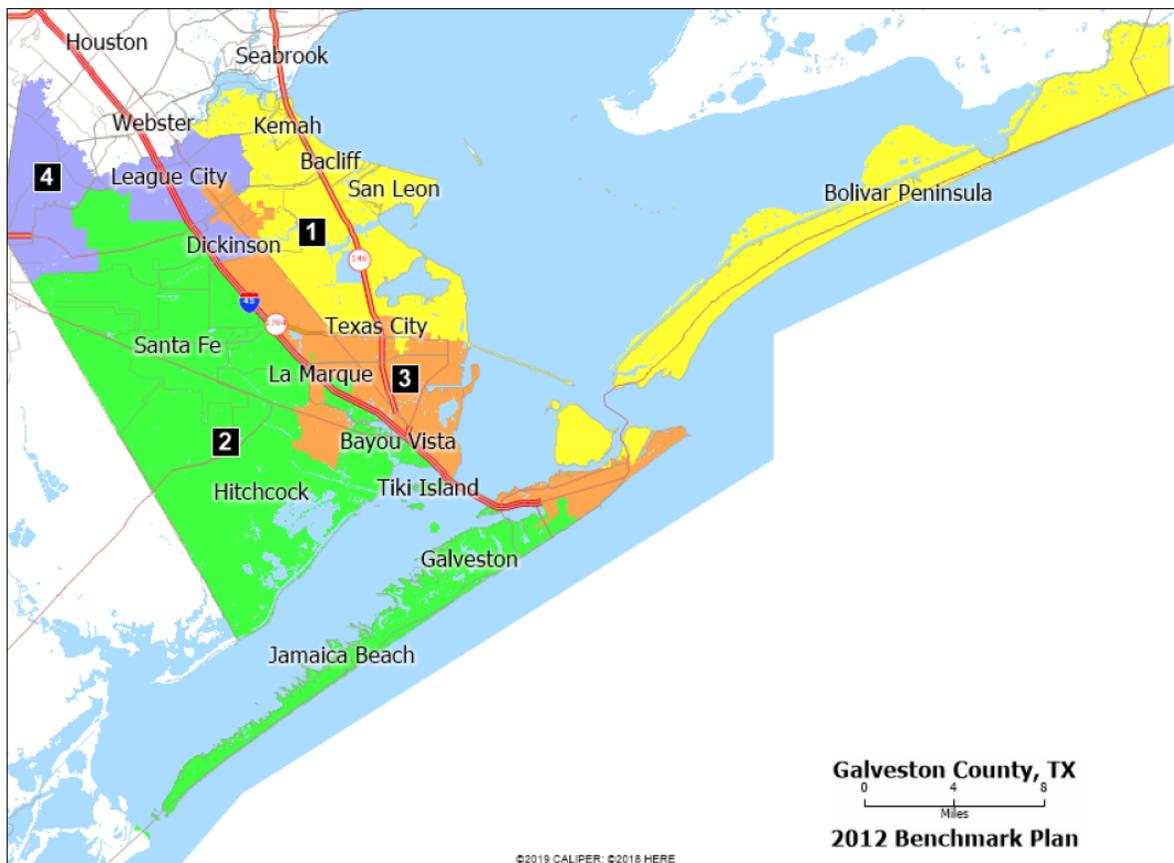
APPENDIX A

**TO NAACP PLAINTIFFS' RESPONSE IN OPPOSITION
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Excerpt of Commissioners Precinct Configurations from January 13, 2023 Report of William Cooper (Doc. 176-2) and March 27, 2023 Rebuttal Report (Doc. 176-29).

Appendix A-1: Benchmark Plan¹⁴

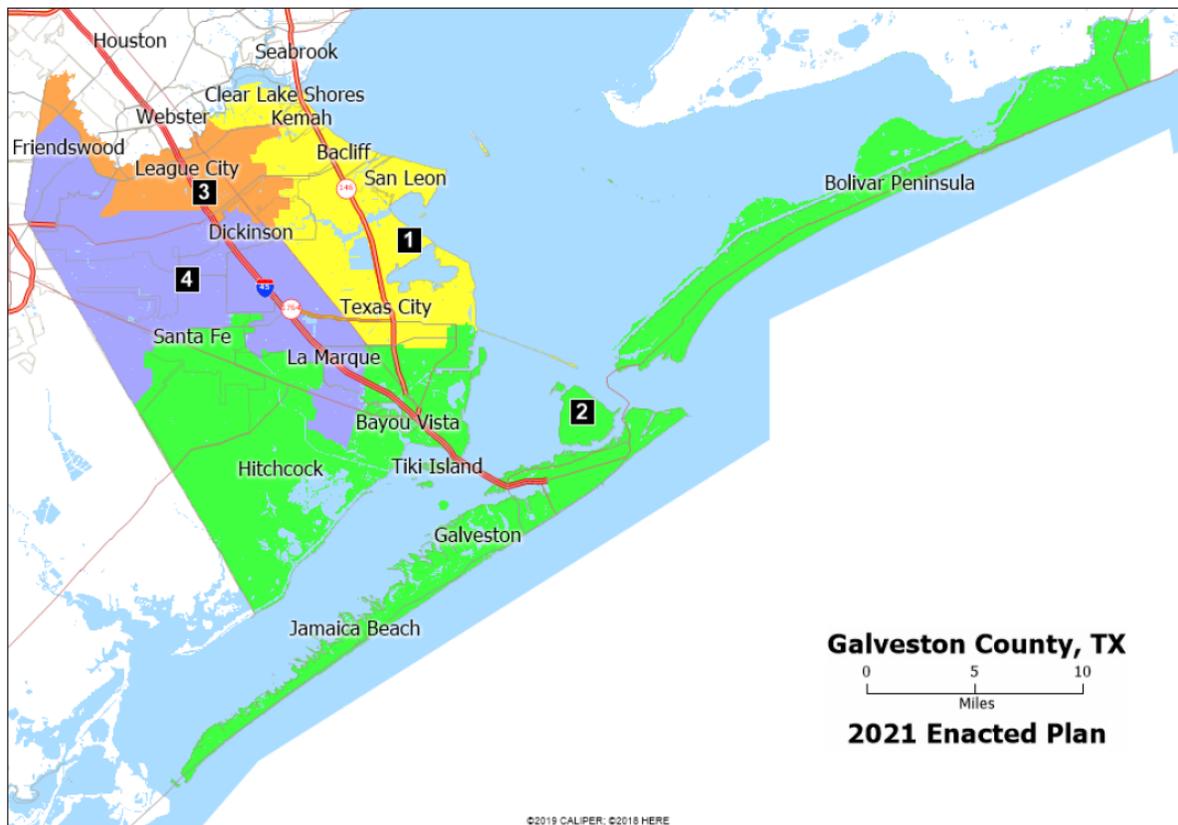
Figure 6: Galveston County Commissioners' Court — Benchmark Plan



¹⁴ Figure 6 from Cooper Report (Doc. 176-2 at 17).

Appendix A-2: 2021 Enacted Plan¹⁵

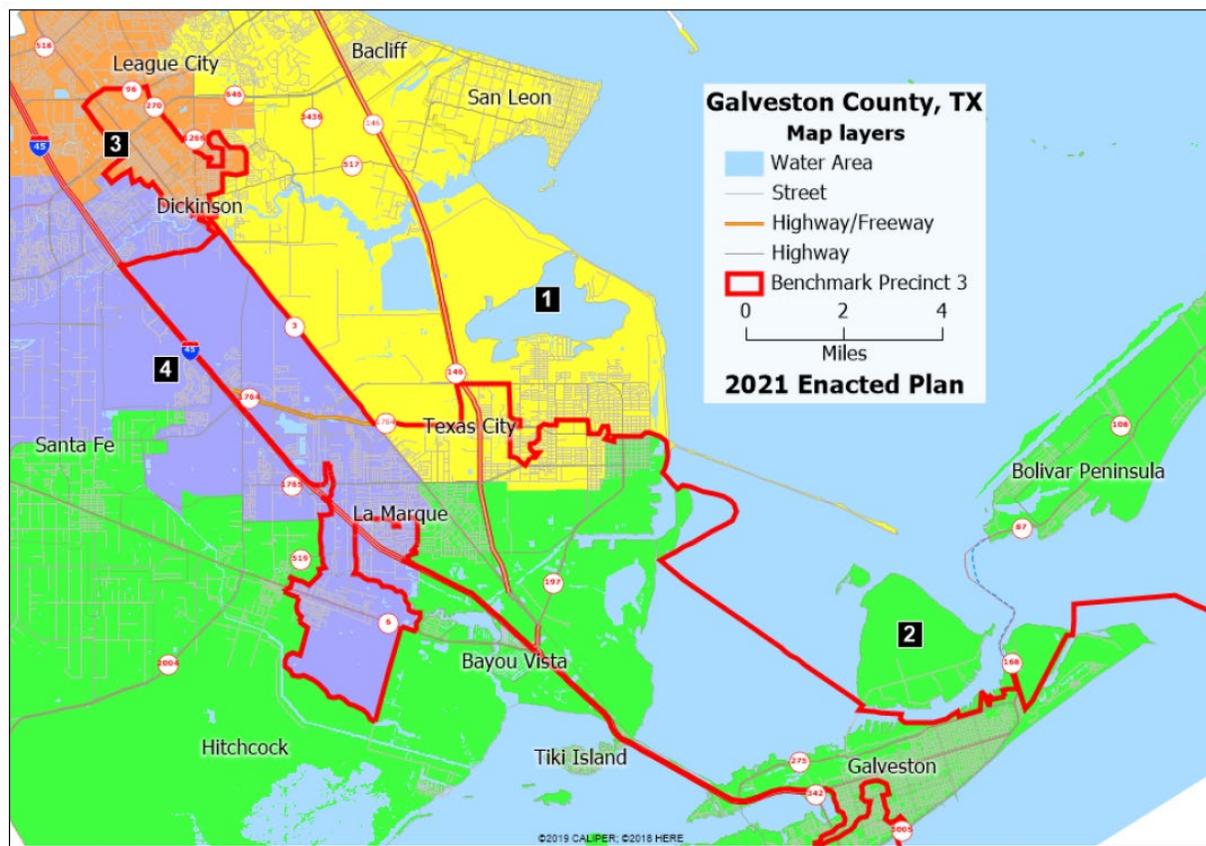
Figure 8: Galveston County Commissioners Court — 2021 Enacted Plan



¹⁵ Figure 8 from Cooper Report (Doc. 176-2 at 20)§.

Appendix A-3: 2021 Enacted Plan with Benchmark Precinct 3 Overlay¹⁶

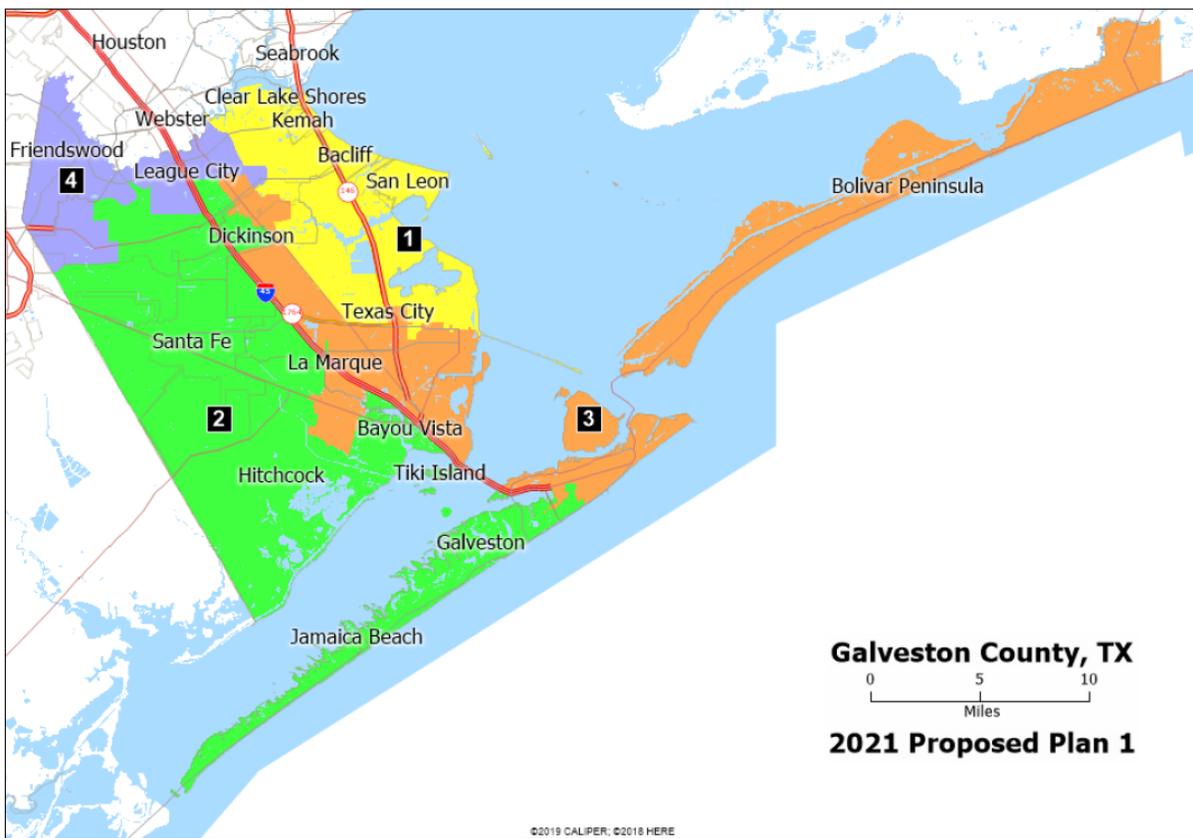
Figure 9: 2021 Enacted Plan with Benchmark Precinct 3 Overlay



¹⁶ Figure 9 from Cooper Report (Doc. 176-2 at 21).

Appendix A-4: 2021 Proposed Plan 1¹⁷

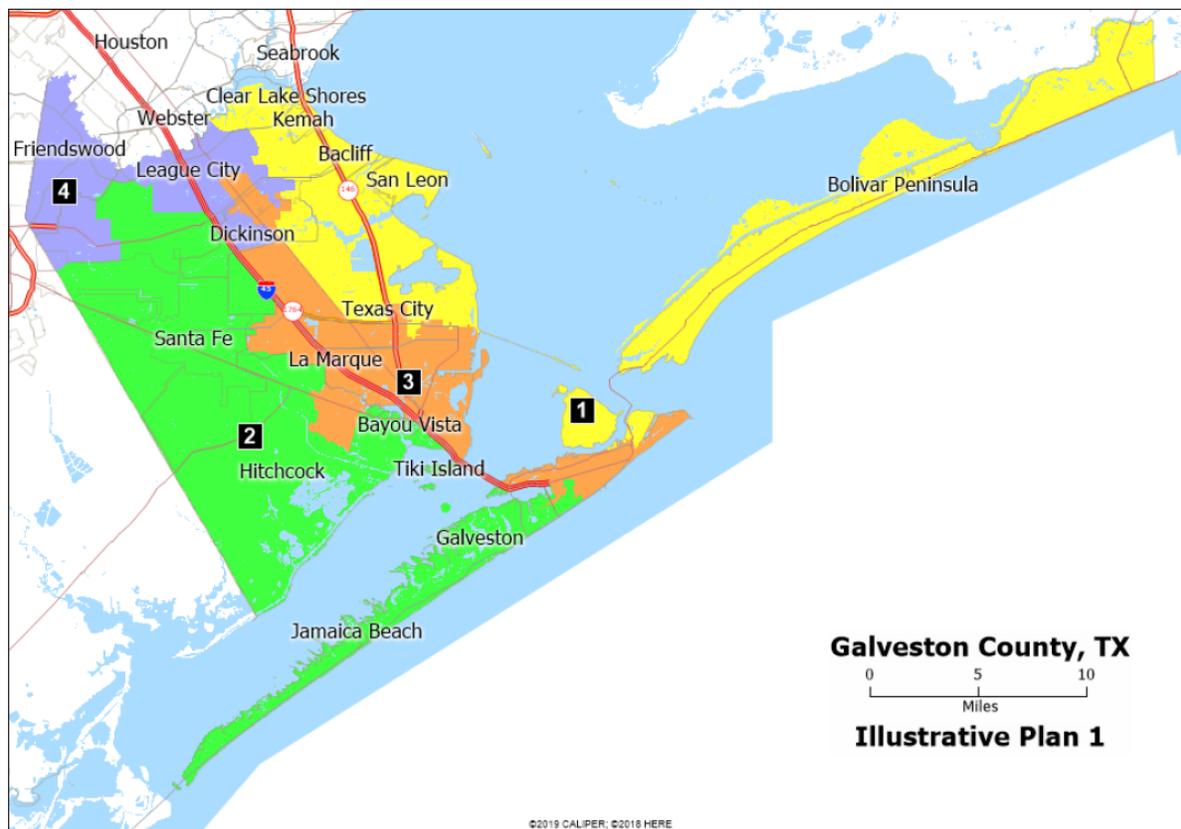
Figure 12: Galveston County — 2021 Proposed Plan 1



¹⁷ Figure 12 from Cooper Report (Doc. 176-2 at 27).

Appendix A-5: Cooper Illustrative Map 1¹⁸

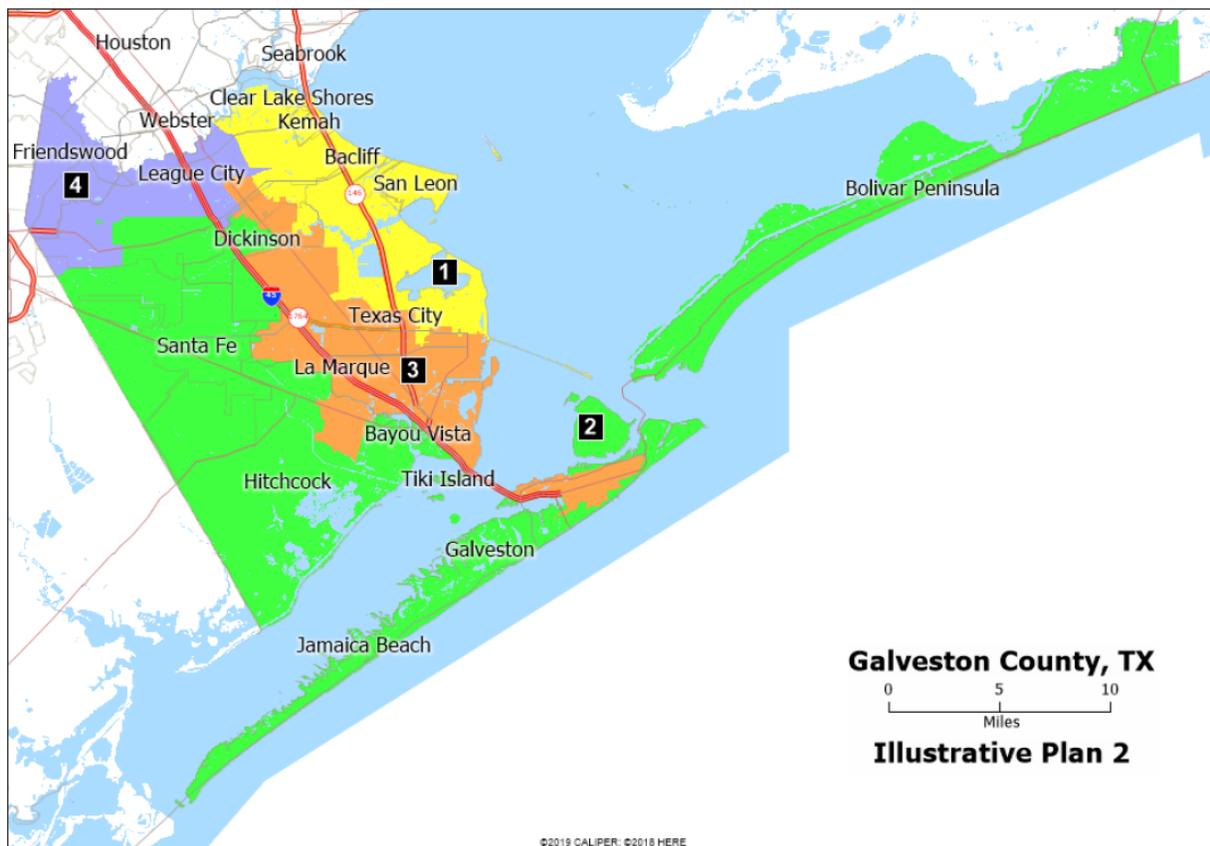
Figure 14: Galveston County — Illustrative Map 1



¹⁸ Figure 14 from Cooper Report (Doc. 176-2 at 30).

Appendix A-6: Cooper Illustrative Map 2¹⁹

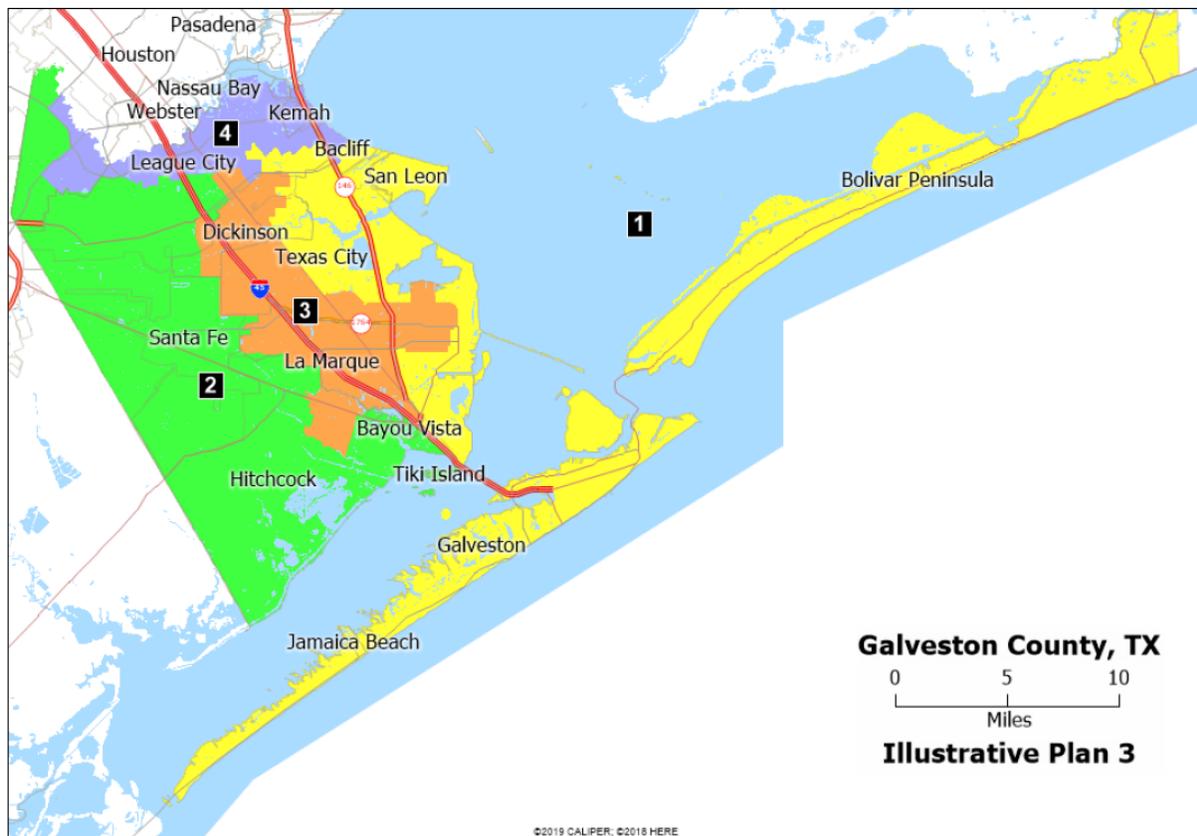
Figure 16: Galveston County — Illustrative Map 2



¹⁹ Figure 16 from Cooper Report (Doc. 176-2 at 33).

Appendix A-7: Cooper Illustrative Map 3²⁰

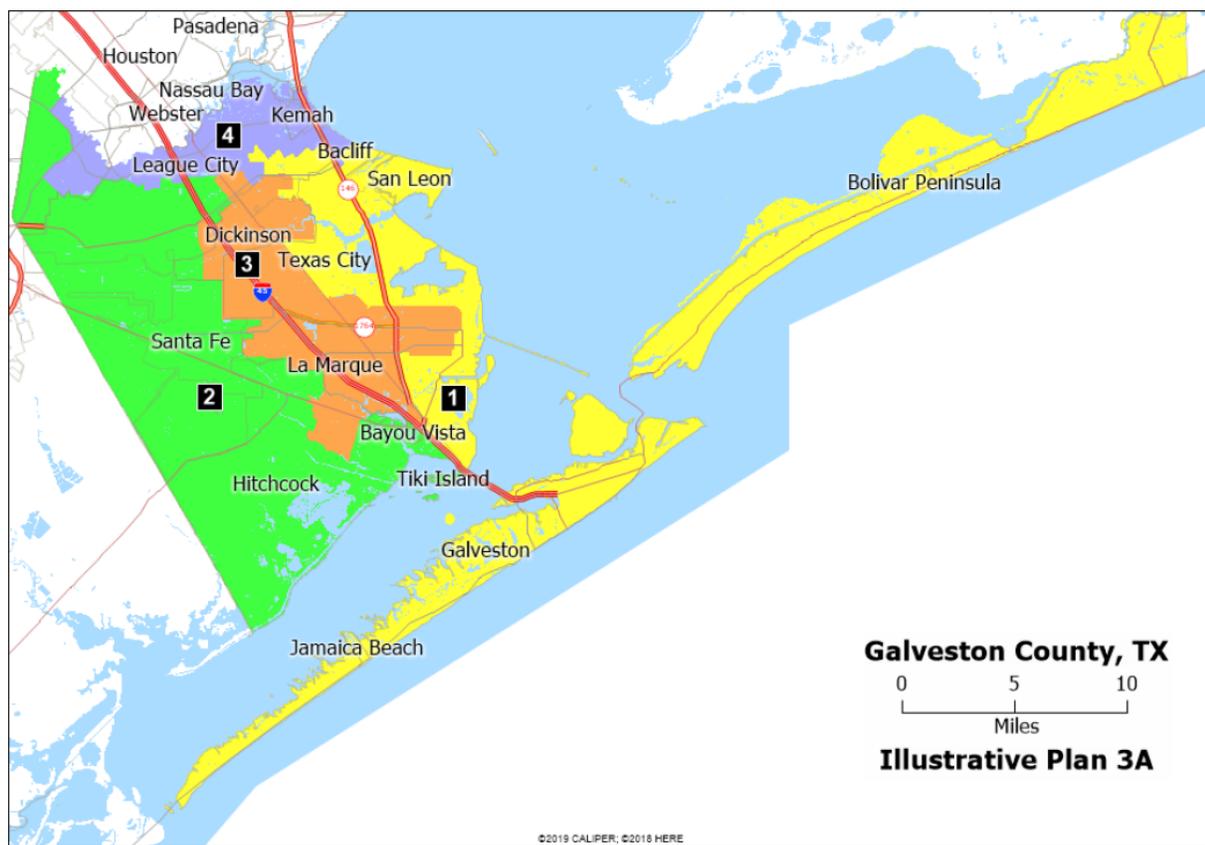
Figure 18: Galveston County — Illustrative Map 3



²⁰ Figure 18 from Cooper Report (Doc. 176-2 at 35).

Appendix A-8: Cooper Illustrative Map 3A²¹

Figure 3: Galveston County — Illustrative Map 3A



²¹ Figure 3 from Cooper Rebuttal Report (Doc. 176-29 at 12).

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

DICKINSON BAY AREA BRANCH §
NAACP, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-117- JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

TERRY PETTEWAY, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-57-JVB
§ [Lead Consolidated Case]
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
v. § Civil Action No. 3:22-cv-93-JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

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**TO NAACP PLAINTIFFS' RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

- EXHIBIT 1 Expert Declaration and Report of Traci Burch, dated January 27, 2023
- EXHIBIT 2 Excerpts of April 21, 2023 Deposition of Barbara Rice Anders, as Mainland NAACP Corporate Representative and in her individual capacity
- EXHIBIT 3 Excerpts of January 10, 2023 Deposition of Commissioner Robin Armstrong
- EXHIBIT 4 Excerpts of March 31, 2023 Deposition of Joe Compian, as LULAC Council 151 Corporate Representative and in his individual capacity
- EXHIBIT 5 Excerpts of March 28, 2023 Deposition of Patricia Toliver, as Galveston NAACP Corporate Representative
- EXHIBIT 6 Declaration of Joe Compian, dated June 1, 2023
- EXHIBIT 7 Declaration of Robert Quintero, dated June 1, 2023
- EXHIBIT 8 Excerpts of March 8, 2023 Deposition of Edna Courville
- EXHIBIT 9 Exhibit 12 from the March 8, 2023 Deposition of Edna Courville
- EXHIBIT 10 Excerpts of April 26, 2023 Deposition of Lucretia Henderson Lofton, as Dickinson Bay Area NAACP Corporate Representative and in her individual capacity
- EXHIBIT 11 Excerpts of December 05, 2022 Deposition of Roxy Hall Williamson
- EXHIBIT 12 Excerpts of January 17, 2023 Deposition of County Judge Mark Henry
- EXHIBIT 13 Galveston County's Pre-Clearance Submission Letter to the U.S. Department of Justice Chief, Voting Rights Section, dated October 14, 2011
- EXHIBIT 14 Excerpts of November 12, 2021 Hearing Transcript (US0002359)
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- EXHIBIT 16 Excerpts of January 6, 2023 Deposition of Commissioner Joseph Giusti

- EXHIBIT 17 Excerpts of October 22, 2021 file sent from T. Bryan to D. Oldham titled “Galveston_Analysis 10_22_21.xls” (DEFS00036212)
- EXHIBIT 18 September 14, 2021 Email from A. Kincaid to D. Oldham re “Galveston report” (DEFS00030111)
- EXHIBIT 19 Excerpts of April 21, 2023 Deposition of William Cooper
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EXHIBIT 1

*Expert Declaration and Report of Traci
Burch, dated January 27, 2023*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

DICKINSON BAY AREA BRANCH §
NAACP, et al., §
§
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§
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UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
v. § Civil Action No. 3:22-cv-93-JVB
§
GALVESTON COUNTY, TEXAS, et al. §
§
Defendants. §

EXPERT DECLARATION AND REPORT OF TRACI BURCH

JANUARY 27, 2023

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QUALIFICATIONS AND BACKGROUND

My name is Traci Burch. I am an Associate Professor of Political Science at Northwestern University and Research Professor at the American Bar Foundation. I received my Ph.D. in Government and Social Policy from Harvard University in 2007.

Over the past 15 years, I have led several large, long-term quantitative and qualitative research projects on political participation in the United States. I have participated in and coauthored several book chapters and articles that examine race, political participation, and inequality, and am widely regarded as an expert on political behavior, barriers to voting, and political participation. My work has been widely cited and replicated and has won several awards. In particular, my dissertation on the effects of felony disenfranchisement on voting in North Carolina, Georgia, and other states, “Punishment and Participation: How Criminal Convictions Threaten American Democracy” won the Robert Noxon Toppan Prize for the Best Dissertation on a Subject of Political Science at Harvard in 2007. I also achieved national recognition for this work; the dissertation was also awarded the E.E. Schattschneider Award from the American Political Science Association for the best dissertation in American Government, and the William Anderson Award for the best dissertation in federalism, intergovernmental relations, and state and local politics. Several articles from this dissertation, including work evaluating voting patterns among people with felony convictions in North Carolina, Georgia, Florida, Missouri, and Michigan, have been published in leading peer-reviewed journals.

My articles “Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout and Party Registration of Florida’s Ex-Felons” and “Turnout and Party Registration among Criminal Offenders in the 2008 General Election,” which appeared in the peer-reviewed journals *Law and Society Review* and *Political Behavior*, respectively, included my calculations of felony disenfranchisement. My academic book on the community-level effects of criminal convictions on political participation, *Trading Democracy for Justice*, was published by the University of Chicago Press and also won multiple national awards from the American Political Science Association and its sections, including the Ralph J. Bunche Award for the best scholarly work that explores the phenomenon of ethnic and cultural pluralism and best book awards from the law and politics and urban politics sections. *Trading Democracy for Justice*, as well as the articles “The Effects of Imprisonment and Community Supervision on Political Participation,” “Did Disenfranchisement Laws Help Elect President Bush?” “Skin Color and the Criminal Justice System,” “The Old Jim Crow,” and “Turnout and Party Registration among Criminal Offenders in the 2008 General Election” rely on the analysis of large criminal justice and voter registration data files. In addition to my published work, I also have conducted analyses of legal financial obligations and barriers to voting as an expert witness.

I have worked with Professors Kay Schlozman, Sidney Verba, and Henry Brady on book chapters and articles related to the causes and consequences of inequality in political participation. I also collected data on congressional hearings and interest group activities for that book. For my coauthored article with Jennifer Hochschild and our book with Vesla Weaver, I analyzed the legislative history of several racial policies, including the 1965 Hart-Cellar Act. We explore political participation and attitudes in our book as well.

I have testified before the U.S. Commission on Civil Rights about the collateral consequences of felony convictions with respect to voting and other issues. I have received several grants for my work, including a grant from the Stanford University Center on Poverty and Inequality. I also serve as co-Principal Investigator on a National Science Foundation grant that supports graduate and postdoctoral fellowships at the American Bar Foundation. I have served on Editorial Boards of leading journals including Political Behavior and Law and Social Inquiry. Currently, I am on the Board of Overseers for the General Social Survey, a longstanding national public opinion survey run by the National Opinion Research Center at the University of Chicago. I routinely review the work of my peers for tenure, scholarly journals, university presses, and grants and have served as a reviewer for the American Political Science Review, The American Journal of Political Science, The Journal of Politics, Political Behavior, the National Science Foundation, Cambridge University Press, Princeton University Press, the University of Chicago Press, Oxford University Press, and many other entities. I also am a member of the Executive Council of the Elections, Public Opinion, and Voting Behavior Section of the American Political Science Association.

My curriculum vitae is appended to this declaration as Appendix C. I am being compensated \$350 per hour for work in this case, plus expenses, and my payment is not contingent upon the outcome of this case. This is my tenth engagement as an expert witness. I previously testified at trial or in a deposition or both in the following matters: *Jones vs. DeSantis*, Consolidated Case No. 4:19-cv-300 (N.D. Fla.); *Community Success Initiative v. Moore*, Case No. 19-cv-15941 (N.C. Super. Ct.); *People First of Alabama v. Merrill*, Case No. 2:20-cv-00619-AKK (N.D. Ala.); *Florida State Conference of the NAACP v. Lee*, Case No. 4:21-cv-00187-MW-MAF (N.D. Fla.). I was also deposed in the matters *One Wisconsin Institute Inc. v. Jacobs*, Case No. 15-CV-324-JDP (W.D. Wis.), and *Luft v. Evers*, Case No. 20-CV-768-JDP (E.D. Wis.), and testified in a preliminary injunction hearing in *Robinson et al. v. Ardoin*, Case No. 22 CV-00211 (M.D. La.) In all cases where an opinion was issued, the courts accepted and relied on my expert testimony.

SCOPE OF THE REPORT

I was asked by counsel for the Petteway Plaintiffs and NAACP Plaintiffs to conduct an analysis of the adoption of the 2021 enacted map in light of the guidelines set forth in *Village of Arlington Heights v. Metropolitan Housing Development Corporation*, 429 U.S. 252 (1977), as well as under certain Senate Factors related to Section 2 of the Voting Rights Act. As I understand that other experts will focus on the historical background of the redistricting, racially disparate impact, and racially polarized voting in Galveston more broadly, I focus my report on the other *Arlington Heights* factors and a totality of the circumstances analysis under Section 2 of the VRA.

OPINIONS OFFERED

A. Summary

Based upon my research and analysis, I conclude the following:

1. The historical record suggests that the Commissioners Court acted intentionally in 2021 to pass a map that would diminish the ability of Galveston's minority voters, and specifically Black and Latino voters, to elect a candidate of their choice because the Commissioners Court believed they could accomplish that goal in the wake of the 2013 Supreme Court decision in *Shelby County v. Holder*.
2. The redistricting process the Commissioners Court undertook in 2021 deviated from the county's past practice with respect to redistricting. Specifically:
 - i. the Commissioners Court failed to adopt any redistricting criteria to guide the process as they did in 2001 and as other counties in Texas continue to do today;
 - ii. unlike in past redistricting cycles, the Commissioners Court held only one public hearing to discuss the commissioners precinct map; that meeting was held the day before the candidate filing period opened for the next general election;
 - iii. the Commissioners Court failed to publicly release any information or analysis regarding the 2020 Census results to Galveston residents at any point in the process;
 - iv. the single redistricting hearing took place during business hours and at a location that was too small for the assembled crowd, in contrast to the multiple locations and evening times offered in the prior redistricting cycle;
 - v. the sole minority member of the Commissioners Court and the representative of the majority-minority precinct was excluded from key deliberations of the court.

Notably, the Commissioners Court was on notice of several of these deviations, and their significance, such as the failure to adopt redistricting criteria and exclusion of the only representative of the majority-minority precinct, because these procedural deviations were noted by the U.S. Department of Justice in its 2012 preclearance objection letter as probative of discriminatory intent in the prior redistricting cycle.

3. The conduct of County Judge Mark Henry in particular indicates a disregard for the input of minority voters in the redistricting process. This is apparent from his failure to take into account substantial written public comments rejecting both proposed maps as racially discriminatory, as well as his comments during the November 12, 2021 public hearing, among other factors.
4. Black and Hispanic residents of Galveston County face disadvantages with respect to education, income, employment, health, housing, and criminal justice. These factors can affect voter participation.

5. Race and implicit racial cues still appear in campaign materials and politicians' statements in Galveston County.
6. Historically, Galveston County only rarely has elected minority candidates for office; only three minority members have been elected to the Commissioners Court since 1990.
7. With the exception of the commissioner elected in the majority Black and Latino district, elected officials are not responsive to the needs of Black and Hispanic constituencies in Galveston.
8. The stated reasons for supporting the adopted plan—adhering to “one person one vote,” equalizing districts within ten percentage points, establishing a coastal precinct based on community of interest, and majority support for the adopted plan—are either unsupported by the legislative record or can be accomplished without eliminating the majority Black and Latino precinct.

In formulating these opinions, I relied on my analysis of standard sources for political scientists such as my review of the relevant literature in political science and other disciplines. I also relied on documents provided to me by the attorneys for the plaintiffs such as deposition and trial transcripts. I also analyzed publicly available information, including websites, recordings of public meetings, newspaper articles, and data from the census and other surveys. All of the data and facts relied upon in forming these opinions, as well as assumptions I made in forming my opinions, are cited in this report and included in its Appendix.

B. Arlington Heights Analysis

The Supreme Court, in *Village of Arlington Heights v. Metropolitan Housing Development Corporation*, 429 U.S. 252 (1977), outlined the following factors as relevant to determining discriminatory intent: (1) “The impact of the official action” -- whether it “bears more heavily on one race than another,” (2) “The historical background of the decision,” (3) “The specific sequence of events leading up to the challenged decision,” (4) “Departures from the normal procedural sequence,” and (5) “The legislative or administrative history . . . especially where there are contemporary statements by members of the decision making body, minutes of its meetings, or reports.” *Id.* at 266–68. I discuss evidence that the court may find useful for evaluating each of the Arlington Heights factors in the following sections.

Racially Disparate Impact

As a starting point, the Court in *Arlington Heights* looks to whether “the official action . . . bears more heavily on one race than another.” The redistricting plan enacted in 2021 fragments the only pre-existing majority-minority commissioners precinct in Galveston, Precinct 3, dividing its population among four new commissioners precincts.¹ As a result, this new plan establishes all four precincts as majority-White in terms of total population, voting-age population, and citizen

¹ See generally, Expert Report and Declaration of William S. Cooper, Section III.B (January 13, 2013).

voting age population.² For several reasons, the discriminatory impact of the maps was foreseeable, and indeed foreseen, by the Commissioners Court.

First, the evidence supports that drawers and supporters of the 2021 enacted plan knew about the racially disparate impact on Galveston’s Black and Latino voters. Judge Henry and Commissioner Ken Clark were on the Commissioners Court when a map that diluted minority voting power was not precleared by the Department of Justice in 2011, and thus knew that Precinct 3 functioned as a majority-minority precinct.³ They had retained the same counsel from the 2011 cycle, Dale Oldham, to draw their map in 2021.

The record also indicates that the Commissioners Court either reviewed racial data or were otherwise aware of the County’s demographics such that they knew the 2021 enacted plan would fragment the only majority-minority precinct among all four new precincts. For example, Judge Henry acknowledged that he was aware that Precinct 3 was a majority-minority precinct,⁴ as did Commissioner Giusti.⁵ Judge Henry also acknowledged that he knew at the time that the enacted plan would split what was the majority-minority Precinct 3 among the four new precincts.⁶ Commissioner Apffel admits that he saw racial data about the new precincts “but just for a second” (Ferguson 2021a).

Second, even if map-drawers and members of the Commissioners Court were not aware during the map-drawing process, the impact of the 2021 enacted map on the minority community was obvious by the time it was adopted. This is evidenced by the volume of public comment submitted by dozens of individuals expressing concern about the effects of the changes to Precinct 3 on minority voting power. In the November 12, 2021 special session, a majority of the speakers indicated that they were concerned that the maps diluted minority voting strength. For instance, Stephanie Swanson, with the Fair Vote Texas Coalition, said:

The folks that live in Precinct 3 work together, play together, and worship together. They have worked to elect Commissioner Holmes to this seat for more than 20 years now. They can be considered a coalition district which is protected under the Voting Rights Act. In the benchmark plan, the African American community consists of 32.7% of citizen voting age population, and the Hispanic community consists of 21.9% of citizen voting age population which totals 54.6% thereby triggering section 2 Voting Rights Act. . . And here we are again, ten years later, in the exact same place. Geographic Strategies has been hired once again to draw the county’s districts, the Commissioners Court did not adopt redistricting criteria, they did not include Commissioner Holmes in the deliberations of the map proposals that are being presented today, and they again have included the Bolivar Peninsula in the map proposal in Precinct 3. And in map proposal 2, the county is proposing

² Expert Report and Declaration of William S. Cooper, Section III.B (January 13, 2013).

³ Henry Deposition, 225:23-25 – 226:1-4. Re Commissioner Clark’s awareness, see (Aulds 2011a, b).

⁴ Henry Deposition, 225:23-25 – 226:1-4.

⁵ Giusti Deposition, 166:4-8.

⁶ Henry Deposition 218:3-8.

to dismantle the coalition district that Commissioner Holmes represents, that courts have upheld the validity of coalition districts, and dismantling a coalition district is indicative of intentional discrimination. I also would like to point out that jurisdictions that have a history of repeatedly discriminating against voters of color can be placed back under the preclearance provision of the Voting Rights Act. We ask that you remove Bolivar Peninsula from Map 1, and that you preserve the coalition district in Precinct 3, and resoundingly reject Map 2.⁷

Commissioner Holmes also presented evidence to the rest of the commissioners that the new map would dismantle the coalition precinct:

The importance of that is, for Precinct 3 in its current configuration, as an over 60% Black and Hispanic VAP population, the map that the commissioners just made a motion on, the largest population of Blacks and Hispanics together is 35%, and that won't have any way to pick the candidate of their choice. I have been the candidate of choice in Precinct 3, not because I'm Black, but because I think I've been the best candidate. But the point is, people have the ability in the precinct to pick the candidate of their choice. White, Black, Hispanic or whatever they should have that right. They should have that right. Some people don't think they should have protections under the Voting Rights Act.⁸

Commissioner Holmes also presented alternative maps that would achieve the required population targets without dismantling the coalition district. The commissioners did not discuss or consider these alternatives; instead, they immediately moved to vote in favor of Map 2 after Commissioner Holmes was finished speaking.

Even before the November 12 meeting, comments that came in through the online portal also expressed concerns about the racial impact of the redistricting plans. A comment submitted Friday, November 5, 2021 argued, "This is vastly uneven and will completely eliminate African American representation in Galveston County . . . to add Crystal beach and Bolivar gives the impression that The County Judge and the other commissioners have an additional agenda that doesn't include fairness and representation within Galveston County."⁹ A comment submitted Tuesday, November 9 argues that Map 2 "completely dilutes the minority vote countywide."¹⁰ These early comments would have provided some indication about racial concerns to the commissioners.

Third, as far as the process itself, the commissioners who supported the enacted plan do not appear to have made any effort to mitigate the negative effects of the plan on Galveston's Black and Latino voters. Commissioner Giusti said that he was unaware of any efforts to preserve the

⁷ 55:30. "CC Special 11-12-21." Available online <https://livestream.com/accounts/21068106/events/6315620/videos/227296657>. Accessed 17 Jan 2023.

⁸ 1:23:57. "CC Special 11-12-21."

⁹ Public Comment Submission #1283416.

¹⁰ Public Comment Submission #1290630.

coalition district.¹¹ Commissioner Apffel stated he believed it would be “impossible” to preserve the coalition district, but later admitted that this opinion was based only on his “belief” and not on actual evidence.¹² Likewise, Judge Henry said that he never asked whether there was a way to preserve Precinct 3 as majority-minority.¹³

The lack of any attempt to preserve the majority-minority precinct is unsurprising given the fact that two of the commissioners who voted for the map, Judge Henry and Commissioner Apffel, have expressed antagonism toward the majority-minority district and a desire to modify it. For example, Commissioner Apffel described the previous map, with its coalition district, as gerrymandered, and equates gerrymandering with drawing majority-minority districts:

Q. What -- when you mentioned gerrymandered like before, what do you -- what are you referring to?

A. Like -- like I just said, drawing lines and making districts that just encompass and circle a certain type of people.

Q. What do you mean, certain type of people?

A. Well, you're the one referring to, for example, people of color, or minorities.

Q. Oh, so that's -- that's what you meant?

A. Yeah.

Q. So when you said gerrymandered like before, were you not -- were you referring to any prior maps?

A. Yeah. I think the map that Stephen Holmes was under, the previous map, was a gerrymandered map.¹⁴

Similarly, Judge Henry said that in the old plan, Precinct 3 looked gerrymandered to him and it had to be that way because they had to keep it as a majority-minority precinct.¹⁵ Given the fact that these commissioners held such negative views of the coalition precinct, it is not surprising that they would favor a plan to eliminate it.

¹¹ Giusti Deposition, p. 162 line 23 – p. 163 line 3 (“Q. Are you aware of any efforts to maintain by any of the commissioners or anyone responsible for drawing 2021 redistricting plans effort to maintain Precinct 3 as a majority-minority Black and Hispanic precinct? A. Not that I'm aware of.”)

¹² Apffel Deposition, 261:22-24; 262: 21.

¹³ Henry Deposition, 224 l. 4-25, p. 225 l. 1.

¹⁴ Apffel Deposition, 264:13 – 265:4.

¹⁵ Henry Deposition, 241:11-19.

To summarize the discussion, the new redistricting plan adopted by the Galveston County Commissioners Court has a racially disparate impact on minority voters because it eliminates the coalition precinct, Precinct 3, and redraws all four precincts to have a White majority. The commissioners knew that their plan would negatively affect Black and Hispanic voters in Galveston County, and there is no evidence that the commissioners who voted for the plan took any steps to mitigate these negative effects. Moreover, the record shows that at least two commissioners viewed the coalition district negatively, describing it as “gerrymandered” based on race. Thus, the record supports that the process undertaken to adopt the 2021 enacted plan was designed to eliminate the majority-minority district.

Historical Background

The next consideration posed by the Court in the *Arlington Heights* opinion involves the examination of “the historical background of the decision . . . particularly if it reveals a series of official actions taken for invidious purposes.” In Galveston County, there is evidence of such a series of official actions to taken to dismantle Precinct 3 as a coalition district and deny Black and Latino voters the equal opportunity to elect their candidate of choice.

First, the Galveston County commissioners have been found to have taken actions that disadvantage minority voters several times. In particular, the commissioners have drawn commissioner precincts and Constable/Justice of the Peace precincts in ways that diluted minority voting strength. The Department of Justice failed to grant preclearance to the County’s redistricting plans for the Constable/Justice of the Peace districts in 1992¹⁶ and 2012, and to the Commissioners Court redistricting plan in 2012.¹⁷ The county had to enter into a consent decree for the 1992 Constable/Justice of the Peace maps as well as for failing to provide election materials in Spanish in 2007.¹⁸

The plan to redraw the commissioners precincts in 2011 serves as an important precursor to the 2021 redistricting. The main point is that the Department of Justice highlighted several procedural anomalies during that redistricting cycle that pointed to a discriminatory purpose:

Based on our analysis of the evidence, we have concluded that the county has not met its burden of showing that the proposed plan was adopted with no discriminatory purpose. We start with the county’s failure to adopt, as it had in previous redistricting cycles, a set of criteria by which the county would be guided in the redistricting process. The evidence establishes that this was a deliberate decision by the county to avoid being held to a procedural or substantive standard

¹⁶ Letter from John R. Dunne to Judge Ray Holbrook, March 17, 1992. Available online: <https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/TX-2450.pdf>. Accessed 17 Jan 2023.

¹⁷ Letter from Thomas E. Perez to James Trainor, March 5, 2012. Available online: <https://www.justice.gov/crt/voting-determination-letter-38>. Accessed 17 Jan 2023.

¹⁸ Consent Decree, Judgment, and Order, *United States v. Galveston County*, CV No.: 3:07-cv-00377 (S.D. Tex. 2007), Dkt. 5.

of conduct with regard to the manner in which it complied with the constitutional and statutory requirements of redistricting.

The evidence also indicates that the process may have been characterized by the deliberate exclusion from meaningful involvement in key deliberations of the only member of the commissioners court elected from a minority ability-to-elect precinct.¹⁹

As I show below, these procedural steps that the Department of Justice raised as problematic—the failure to adopt redistricting criteria and the exclusion of Commissioner Holmes from key decisions—appear again during the 2021 redistricting of the Commissioner Precincts.

The Supreme Court struck down the preclearance provision that prevented Galveston County from enacting their original 2011 plan in *Shelby County v. Holder* 570 U.S. 529 (2013). In the wake of that decision, many states and localities began to enact election changes that detrimentally affected minority voters. For instance, hundreds of polling places in jurisdictions formerly subject to preclearance closed between 2012 and 2018.²⁰ States (including Texas) immediately passed strict Voter ID provisions after *Shelby* that had been blocked under Section 5 of the Voting Rights Act (Billings et al. 2022). Voter purging also increased in formerly covered jurisdictions after *Shelby* (Feder and Miller 2020). Recent studies suggest that eliminating preclearance had negative effects on minority voter turnout (De Rienzo Jr 2022, Billings et al. 2022).

The elimination of preclearance for Galveston County, as with other covered jurisdictions, allowed the county to pursue electoral changes that would have been blocked prior to 2013 because of their effects on minority voters. For instance, in August 2013, just months after the *Shelby* decision, the county moved to enact the Constable/JP precincts that the Department of Justice had objected to in 2012 once they no longer had to satisfy the obligations of Section 5. Galveston County was the first jurisdiction to redistrict after *Shelby* and did so without consulting the federal government (Swift 2013). Trial testimony in a previous case shows that the county intentionally waited until after *Shelby* was passed to enact the plan that had drawn the objections from the Justice Department.²¹

The evidence suggests that the commissioners also thought that the lack of a preclearance requirement was important to their ability to accomplish their longstanding goals during the 2021 redistricting cycle.

At the April 5, 2021 meeting of the Commissioners Court, Galveston General Counsel Paul Ready began by presenting an engagement letter to retain Dale Oldham and the firm Holtzman, Vogel, Josefiak, and Torchinsky for the approval of the commissioners.

When it came time for the Commissioners to vote, Mr. Ready made it clear that Mr. Oldham was involved in the 2011 round of redistricting as “the demographer 10 years ago” and describing the firm Holtzman, Vogel, Josefiak and Torchinsky as “a firm out of DC that was brought to us by

¹⁹ Letter from Thomas E. Perez to James Trainor, March 5, 2012.

²⁰ See (*The Leadership Conference Education Fund 2019*).

²¹ Trial Transcript Vol. 3, at 139:9–140:2, *Petteway v. Galveston County*, Case No. 3:13-cv-00308 (S.D. Tex. 2014), Dkt. 76.

Dale Oldham, who was involved in the last redistricting, that was an activity that was part of the firm.”²² A commissioner asked off camera whether there was another firm perhaps from Houston who could do the work, and Ready replied that Oldham’s involvement in the last round of redistricting was the reason for hiring him:

Unknown: Is there anybody in Houston?

Ready: There are. The reason this letter is the one in front of you is because Oldham has already got the familiarity with Galveston County having done it 10 years ago and so it should be a shorter more efficient path for him to adjust his prior work as opposed to somebody recreate it.²³

A few minutes later, after an exchange about the release of the census data, Judge Henry brings up redistricting litigation:

Judge Henry: We would not expect litigation on the JP constables like we got last time.

Ready: It’s hard to say. I will say among the changes is that there’s no more preclearance so on that end it’s a little bit cleaner. The other thing to sort of note is that although we don’t expect final data until the fall . . .²⁴

These two exchanges are important because they show that the commissioners are hiring the same person to work from the same maps as 2011 that eliminated Galveston’s only majority-minority commissioners precinct, but they expect a different outcome due to the fact that preclearance of redistricting plans is no longer required under Section 5 of the Voting Rights Act.

Commissioner Holmes later said that he thinks the plan was to run “the same playbook that happened in 2012, only this year, you don’t have to have approval from the justice department to approve the maps.”²⁵

To conclude, the evidence presented here shows that Galveston County’s enactment of the 2021 redistricting plan is consistent with the county’s past pattern of attempting to eliminate majority-minority districts. Importantly, the commissioners themselves discussed a connection between the past redistricting cycle and their goals for the current cycle.

Sequence of Events

The Court in *Arlington Heights* found that analyzing the “specific sequence of events leading up to the challenged decision,” in this case, the redistricting map enacted in Galveston County, may shed light on the reasons the decision was made. The sequence of events is important to show if the process was rushed and executed in a way that deviated from prior standard practices or that limited public transparency and input. Furthermore, the timing of certain statements made by Judge

²² 16:15. “CC REG 04-05-21.” Available online

<https://livestream.com/accounts/21068106/events/6315620/videos/219596656>.

²³ 17:59. “CC REG 04-05-21.”

²⁴ 19:55. “CC REG 04-05-21.”

²⁵ 1:22:16. “CC Special 11-12-21.”

Henry and other actors relative to the passage of the map makes particular rationales advanced by the commissioners suspect.

My understanding of the timeline relevant for my discussion regarding the 2021 redistricting cycle, based on publicly available information, is as follows:

Table 1: 2021 Redistricting Timeline

April 5	2021—Retain redistricting counsel ²⁶
August 12	2021—Census redistricting data released (U. S. Census Bureau 2021)
October 29	2021—Redistricting Maps 1 and 2 posted to Galveston County Website for public comment ²⁷
October 29	2021—Judge Henry posts that he supports Map 2 because of coastal precinct ²⁸
November 9	2021—First Public Notice of Nov 12, 2021 Special Meeting posted. ²⁹
November 10	2021—Community leaders in Galveston and Bolivar Peninsula say they have not provided feedback in support of coastal precinct (Ferguson 2021e)
November 12	2021—Public meeting at League City Annex; 2021 enacted map adopted ³⁰

The Galveston County Commissioners Court had unusually little on the public agenda regarding redistricting in 2021. The commissioners and county judge also made very few public statements regarding the process or the reasoning behind their decisions.

The redistricting calendar was shifted this year because of the late arrival of the census data. However, the commissioners knew the approximate window between when the data would arrive and when they wanted to pass the maps; they could have planned their process to accommodate public hearings. For example, Judge Henry knew that the census data for redistricting would be released in August of 2021.³¹ However, unlike in 2011, he did not attempt to schedule a public

²⁶ “Minutes.”

<http://agenda.galvestoncountytexas.gov/sirepub/mtgviewer.aspx?meetid=2613&doctype=MINUTE>
S.

²⁷ See County of Galveston, TX. “Redistricting.” Available online <https://www.galvestoncountytexas.gov/our-county/county-judge/redistricting>. Accessed 27 Jan 2023.

²⁸ "Exhibit 0031 - 61_Exhibit.pdf"

²⁹ Email from Linda Liechty, November 9, 2021. "DEFS00031013"

³⁰ “Minutes.”

<http://agenda.galvestoncountytexas.gov/sirepub/mtgviewer.aspx?meetid=2641&doctype=AGENDA>

³¹ Henry Deposition, 156:4-17.

hearing or meeting to provide those data to the public.³² Judge Henry also expressed that he wanted to have the maps adopted by mid-November in time for the candidate filing process.³³

At the April 5, 2021 regular session, the commissioners discussed their understanding that the census data for redistricting would arrive later than usual. General Counsel Paul Ready raised the possibility that some work could be possible sooner:

The other thing to sort of note is that while we're not expecting the final data until the fall, I'd say it's possible maybe even likely that we get preliminary data over the summer and we could begin planning conceptually though you may not finalize the lines until then.³⁴

As noted above, the census data were released on August 12, 2021. The Commissioners expected as early as April 5, 2021 that the data would be released “sometime late summer, early fall”³⁵ and had every opportunity to structure the process to allow for greater transparency and public input. There was ample time to schedule in-person public meetings. For instance, Commissioner Apffel was able to attend a meeting of the Bolivar Chamber of Commerce to discuss redistricting on Bolivar Peninsula on November 11, 2021 (2021a). Notably, this meeting occurred after the president of the Bolivar Chamber of Commerce was quoted in the newspaper saying that she thought the majority of people would prefer to keep Commissioner Apffel and not to have one coastal precinct (Ferguson, 2021e).

This sequence of events is also important for contextualizing one particular justification for adopting the map that was chosen: the coastal precinct justification. As noted above, the redistricting plans were posted to the county website on October 29, 2021. That same day, Judge Henry also posted a statement in support of the maps to his social media. He wrote on Facebook, “Having a coastal precinct will ensure that those residents directly along the coast have a dedicated advocate on commissioners court” according to the Galveston Daily News (Ferguson 2021d). This stated interest in establishing a coastal precinct came *before* any public comment on the new precinct maps had been solicited at all. There was in fact no concerted push from affected areas such as the Bolivar Peninsula or the City of Galveston (Ferguson 2021d). Judge Henry’s post seems to create a public desire for a coastal community of interest united into one district out of thin air; these areas had not been lumped together in a precinct before, and there is no evidence of public advocacy for this single coastal precinct in 2021 before Judge Henry’s October 29, 2021 social media post (Ferguson 2021e).

Moreover, a purported desire for a coastal precinct cannot explain the decision to crack apart the minority community outside the coastal precinct. The map³⁶ below, which is contained in the Appendix to Dr. Baretto’s and Dr. Rios’s report, shows the 2021 enacted plan boundaries over demographic shading by census voting tabulation district. This map shows that the minority community’s splintering in the 2021 enacted plan was a map-wide feature:

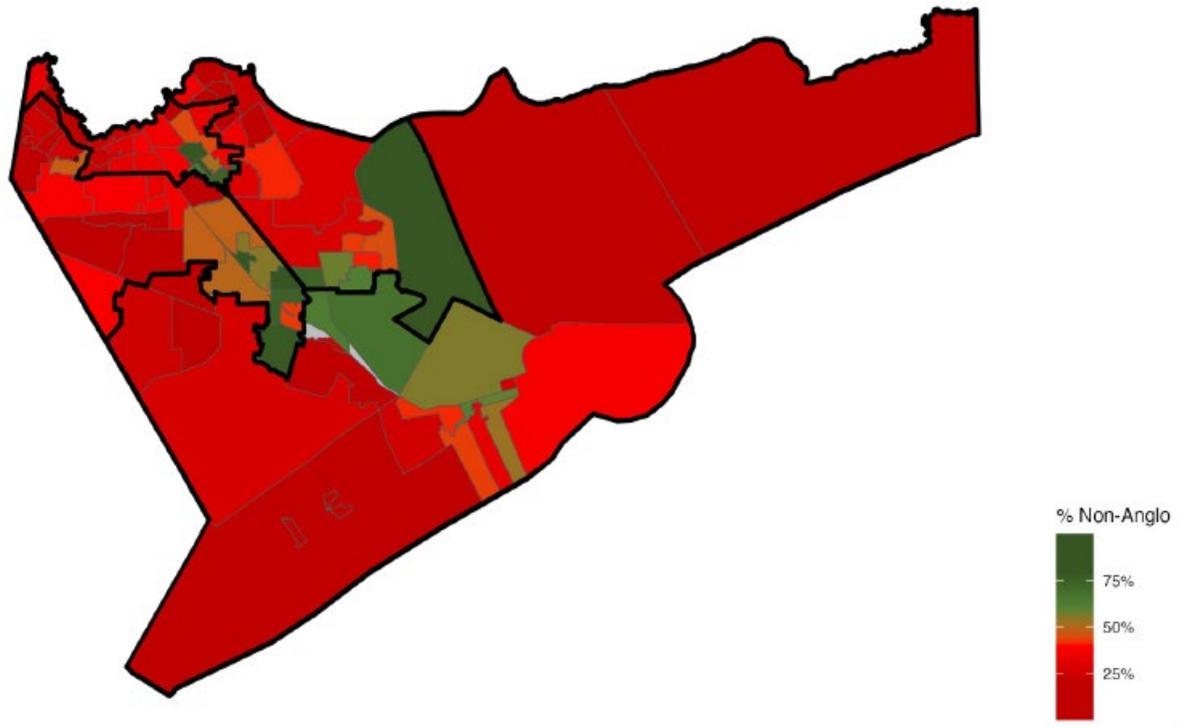
³² Henry Deposition, 159:14-25.

³³ Henry Deposition, 152:20 –153:5.

³⁴ 20:06. “CC REG 04-05-21.”

³⁵ 18:56. “CC REG 04-05-21.”

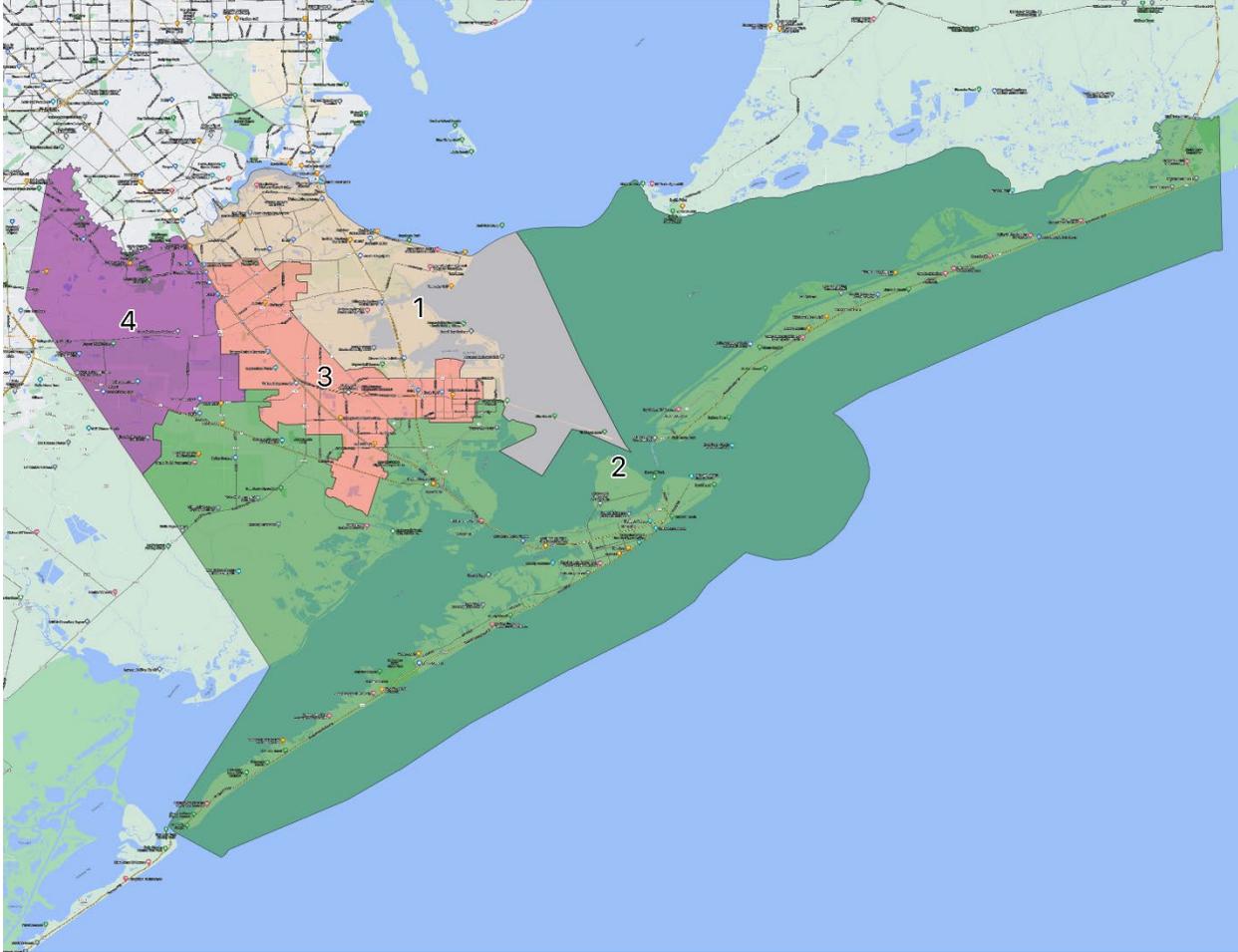
³⁶ Declaration of Dr. Matt A. Barreto and Michael Rios, page 170.



While it appears obvious from the map, the question of whether creating a coastal precinct can explain the elimination of a minority opportunity precinct can be tested by determining whether alternative maps are possible that satisfy the purported desire for a coastal precinct without such a striking effect on the minority population. To answer this question, I was provided a series of maps drawn by Petteway Plaintiffs’ mapping expert that do just that.

Alternative Map 1

Alternative Map 1 keeps the so-called “coastal precinct”—Precinct 2—unchanged. Thus, it directly tests whether the creation of a coastal precinct in the precise configuration adopted by the Commission explains the fragmentation of the minority population. As Alternative Map 1 shows, the creation of Precinct 2 as a “coastal precinct” does not explain the cracking of the minority population, because Precinct 3 in this alternative map remains a compact majority-minority precinct.



This and other alternative maps, which are included in Appendix B to my report, show a sampling of ways in which a coastal precinct can be created while retaining a compact, majority-minority precinct.

These alternative maps illustrate that the purported desire for a “coastal precinct” cannot explain the fragmentation of the minority population. Moreover, it is noteworthy that Judge Henry and Commissioner Apffel have both disclaimed in deposition testimony that partisanship—*i.e.*, a desire to create an additional Republican precinct—explained the fragmentation of the minority community as well.³⁷

Departures from the Normal Procedural Sequence

Although examining the particular sequence of events helps shed light on the intentions of the Commissioners Court, the 2021 timeline is even more notable for the *absence* of certain events and procedures as compared to both Galveston County’s prior practice, and the standard practice

³⁷ For instance, when asked was “partisanship a factor in your evaluation of these maps?” he responded, “Not at all.” See Apffel Deposition 193:6-8. Similarly, when Judge Henry was asked about the importance of passing the maps “to keep Galveston County red,” he replied that he “already had that with three commissioners.” See Henry Deposition 258:15-259:9.

of jurisdictions at the local and state levels. In this case, the pattern of departures from prior and normal procedural sequences seems designed to stifle transparency and opposition for several reasons.

First, from the beginning, even the process of hiring the law firm was different from that followed in 2011. For instance, in 2011, the commissioners court agenda included notice of executive sessions (on April 19, 2011 and April 26, 2011) during which law firms were interviewed for redistricting, with a meeting to hire the firm on May 17, 2011.³⁸ In 2021, the court appeared to follow no such process. No interviews of firms for redistricting purposes appear on the public agenda, and Judge Henry has admitted that he specifically sought out the firm that he had worked with in 2011.³⁹ As noted before, there was no public disclosure of who the county intended to retain before the April 5, 2021 meeting to vote on the engagement. More telling, the other Commissioners did not seem familiar with the firm or the engagement letter in the April 5, 2021 meeting. Commissioner Clark said the engagement letter had not been posted online and Commissioner Holmes asked, “Who are we hiring?”⁴⁰ There was no indication that other bids were considered, although other bids were received.⁴¹

Second, no other public meetings, executive sessions, or workshops on redistricting were held between the April 5, 2021 meeting where the law firm was hired and the November 12, 2021 special session in which the 2021 enacted plan was adopted. This lack of public meetings is unusual for Galveston. In 2011, redistricting workshops were on the Commissioners Court public agenda on March 29, 2011 and June 21, 2011 (the census redistricting data were released beginning in February of that year),⁴² and the Commissioners Court presented the results of the 2010 Census on August 2, 2011.⁴³ Thereafter, the Commissioners Court held five public hearings specifically to solicit comment on the maps, before a final meeting on August 30, 2021 to vote on maps that had been modified in response to public comment.⁴⁴

In contrast, any consideration by the Galveston County Commissioners Court of proposed maps, other than the November 12, 2021 hearing in which they held a final vote, happened behind closed doors. There was no pre-Census working session, no presentation of the Census results, and no hearings held for public comment before final maps were proposed in October.

³⁸ See Agendas at

<http://agenda.galvestoncountytexas.gov/sirepub/mtgviewer.aspx?meetid=97&doctype=AGENDA>;
<http://agenda.galvestoncountytexas.gov/sirepub/mtgviewer.aspx?meetid=99&doctype=AGENDA>;
 and

<http://agenda.galvestoncountytexas.gov/sirepub/mtgviewer.aspx?meetid=102&doctype=AGENDA>;

³⁹ Henry Deposition, 120:3-18.

⁴⁰ 16:13. “CC REG 04-05-21.”

⁴¹ Letter from Allison, Bass, & Magee, L.L.P., February 6, 2020.

⁴² See Agendas at

<http://agenda.galvestoncountytexas.gov/sirepub/mtgviewer.aspx?meetid=94&doctype=AGENDA>
 and

<http://agenda.galvestoncountytexas.gov/sirepub/mtgviewer.aspx?meetid=107&doctype=AGENDA>.

⁴³ Letter from Thomas E. Perez to James Trainor, March 5, 2012.

⁴⁴ Letter from Thomas E. Perez to James Trainor, March 5, 2012.

Furthermore, the lack of public consideration of the proposed maps was designed specifically to avoid requiring a public meeting. Commissioner Giusti says that holding meetings with just two commissioners is a way to get around open meetings rules:

Q. So when you talk about the law related to quorums, during the process, for example, I believe the October 2021 meeting where you met with Dale Oldham and you were present and Tyler Drummond and Jed Web was also present, was that set up in a manner to avoid violating the law that applies to quorums?

MS. OLALDE: Objection; form.

THE WITNESS: Yes, I would assume it is . . .⁴⁵

Commissioner Apffel explains the two-commissioner redistricting meetings similarly:

Q. But only with Judge Henry and you, from the Commissioners Court?

A. Yeah. Because as I told you, it's the judge's duty and responsibility to handle redistricting, in my opinion. And more than two people would be a quorum.⁴⁶

Judge Henry confirmed that no more than two commissioners met at a time to discuss redistricting in order to avoid a quorum, which triggers the requirements for transparency under the Open Meetings Act.⁴⁷ Judge Henry described the requirements as follows:

We are -- anytime there's a quorum, which is three or more, we're required to notice that publicly, notice the public about what we're going to be discussing, give at least 72 hours, and have it recorded.⁴⁸

These comments suggest that the commissioners structured their meetings in pairs or directly with Mr. Oldham in succession in order to avoid the requirements of open meetings and minimize transparency in the process.

Commissioner Holmes also was excluded from full participation in the redistricting process. During the November 12, 2021 meeting, he said:

And the other part of it was, essentially, meeting with the lawyer that one time, I didn't have any input in this process. I didn't have a vote on whether or not we would put these maps online, I didn't have a vote on which maps would get put online. I did not get an opportunity to submit a map.⁴⁹

The exclusion of Commissioner Holmes was a suspicious exercise called out as such by the Department of Justice in 2012:

⁴⁵ Giusti Deposition, 104:14-105:7.

⁴⁶ Apffel Deposition, 129:10-15.

⁴⁷ Henry Deposition, 172:11-21; 353:16-22.

⁴⁸ Henry Deposition, 354:17-21.

⁴⁹ 1:21:25. "CC Special 11-12-21."

“The evidence also indicates that the process may have been characterized by a deliberate exclusion from meaningful involvement in key deliberations of the only member of the Commissioners Court elected by the minority ability to elect their own county commissioner. Precinct 3 is the only precinct in the county where minority voters have the ability to elect candidate of choice, and it is the only precinct currently represented by a minority person.”⁵⁰

As was the case in 2012, at the time of the redistricting, Commissioner Holmes was still the sole minority member of the Commissioners Court and the representative of the only minority coalition precinct.

Third, redistricting criteria were not adopted to guide the process, despite the fact that such criteria have been adopted in Galveston in the past and continue to be used in other counties in Texas today. Prior to the attempts to eliminate the majority-minority Precinct 3 that began in 2011, Galveston County, like others in Texas, adopted redistricting criteria to guide the redistricting process. In 2001, for instance, the redistricting criteria were adopted at a May 7, 2001 regular meeting of the Galveston County Commissioners Court. Many counties across Texas continued to use this format to adopt redistricting criteria during the 2021 cycle.⁵¹

Fourth, when the proposed maps were released by the county on October 29, 2021, the public was given no quantitative information about the maps. Again, there was a lack of transparency: the underlying population and demographic data were not released with the maps. Interested citizens could not see how the proposed maps changed precinct demographics by viewing information made publicly available by the county.

Finally, the lack of in-person public meetings denied the public the opportunity to provide meaningful feedback on the maps. This lack of in-person engagement was a departure from the normal procedural sequence.⁵² Unlike in 2011, where the Commissioners Court held five public hearings on redistricting in the two weeks before the map was approved,⁵³ in 2021 during the two weeks between when the maps were released on October 29, 2021 and approved, only one in-person special session was called with the minimum of 72 hours notice. That meeting was held on November 12, 2021, the day before the candidate filing period for the 2022 general election. It was

⁵⁰ Letter from Thomas E. Perez to James Trainor, March 5, 2012.

⁵¹ See orders from Glasscock County

<https://www.co.glasscock.tx.us/upload/page/0784/2021/Order%20Adpoting%20Criteria.pdf>;

Nacogdoches County

<https://www.co.nacogdoches.tx.us/downloads/Order%20Adopting%20Criteria%20For%20Use%20in%20the%202021%20Redistricting%20Process.pdf>; and Harris County

<https://cao.harriscountytexas.gov/Portals/20/Documents/Redistricting%20Order.pdf?ver=ebmKIX1ellRIVmYTTNE6Kg%3d%3d>.

⁵² This departure is not due to COVID-19 precautions; the Commissioners Court was still holding in-person meetings with public comments throughout 2021.

⁵³ Agenda,

<http://agenda.galvestoncountytexas.gov/sirepub/mtgviewer.aspx?meetid=115&doctype=AGENDA>.

held at 1:30pm in the Calder Road Annex in League City. By contrast, in 2011, those five meetings were all held in the evening, after work, in several cities across the county.⁵⁴

The November 12, 2021 meeting is also notable for its inconvenience. The location was not designed to accommodate the crowd, over 100 people, who showed up to discuss the redistricting plan. The meeting room was standing-room only, with people overflowing into halls and other rooms.⁵⁵ Many people could not hear the meeting. The crowd was upset:

Rev. W. H. King: “You called a meeting where you KNEW there would not be enough space for the people. You have elderly people standing up on the outside. You know better than that. [applause]. These are voters. They pay for the buildings that Galveston has. They should be able to come into the building comfortably without having to stand on walls and chairs and being able to stand on their legs or using their canes or their walkers.”⁵⁶

Lucretia Lofton: “The fact that this meeting was called at a time that conflicts with most taxpaying citizens reinforces the notion that the community interest is not considered which is beyond reproachment because the same people that pay their taxes into this exact county lack inclusiveness and equality.”⁵⁷

Rev. Timmy Sikes: “The same thing that was going on twenty-three years ago is the same thing that’s going on today. And excuse me if I get emotional because its personal to me, not only personal but it’s personal to everybody that’s present. This county has facilities that are large enough to hold a crowd that’s in here and outside, and on a Friday at 1:30, they want to have a meeting because they didn’t think we were gonna show up.”⁵⁸

As audience members note, the meeting location was inconvenient, people did not have an opportunity to hear the discussion, and sufficient accommodations were not made for the elderly or other people with disabilities. The Commissioners Court should have been aware that there would be significant public interest in redistricting, given the hundreds of online public comments on the current maps and the hundreds of attendees at redistricting public hearings in 2011 (Aulds 2011c), yet still failed to hold even one fully accessible public meeting. The image of the overflowing room below illustrates the point:

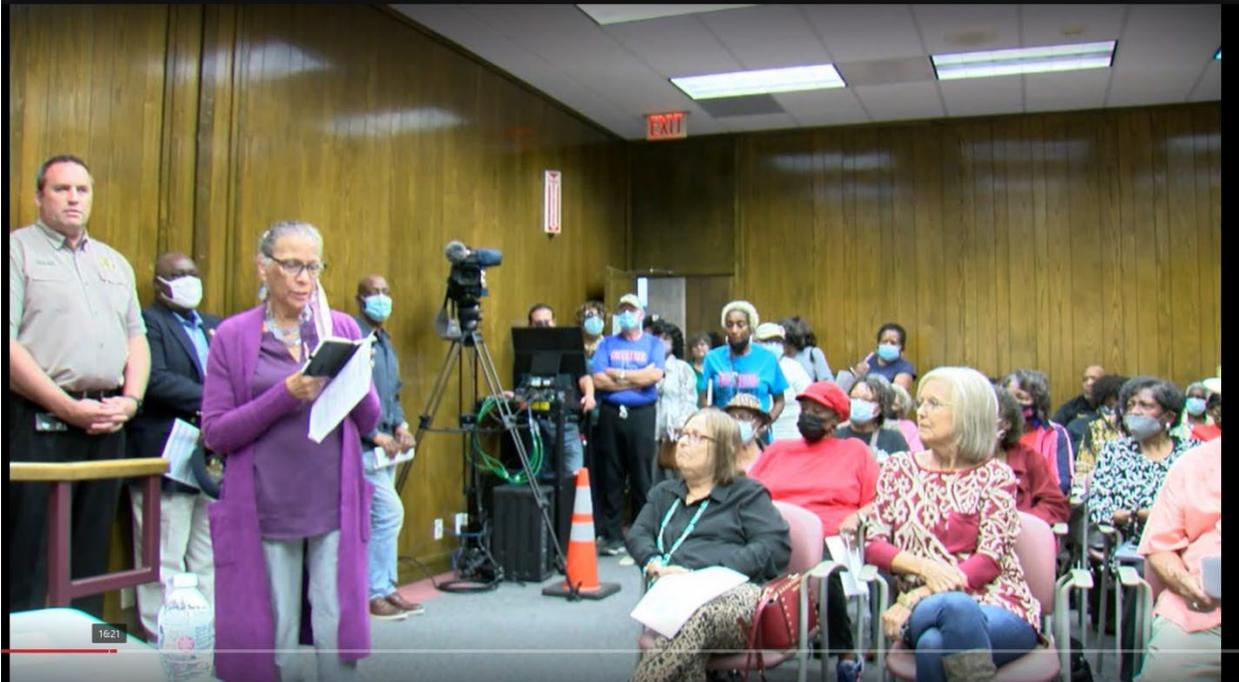
⁵⁴ *Id.*

⁵⁵ See attached image of the meeting room.

⁵⁶ 40:32. “CC Special 11-12-21.”

⁵⁷ 52:56. “CC Special 11-12-21.”

⁵⁸ 1:10:30. “CC Special 11-12-21.”



Some Commissioners might argue that the online comments were sufficient for public engagement with the maps. However, according to the 2021 American Community Survey, while 96.6% of non-Hispanic White people in Galveston have access to a computer with broadband internet at home, only 89.6% of Black Galveston residents do. One difference between the online portal and the in-person public comments lies in the commissioners' response to them. At public meetings, all the commissioners who are present hear every public comment. However, the commissioners may not have reviewed all the online comments to the map. This was the case in Galveston. For instance, Commissioner Apffel admits that he only saw some of the comments:

Q. Did you review the comments that -- excuse me. Did you review all the comments that were submitted through the website?

A. Drop the word all, and maybe some. But not all.⁵⁹

Likewise, Judge Henry admits that he read only a few of the online comments, less than a dozen, while Commissioner Giusti also says he reviewed about 15 of the online comments.⁶⁰

To summarize the evidence presented, it is clear that the process that produced the redistricting plan enacted by Galveston County departed substantially from past practices. These departures had the intent and the effect of minimizing public input and transparency. Failing to adopt redistricting criteria, hold convenient public hearings, or release quantitative data made it much more difficult for the public to provide feedback on the maps. Online participation was not a replacement for the in-person meetings—the commissioners who supported the plan admit that they did not read more than a few of the online comments.

⁵⁹ Apffel Deposition, 187:7-12.

⁶⁰ Henry Deposition, 273–274; Giusti Deposition 124:2-5.

Contemporaneous Statements

The factors articulated in *Arlington Heights* acknowledge the importance of contemporaneous statements by decisionmakers for showing their intent. In particular, I would like to point to three statements that I would characterize as attempts by Judge Henry to diminish the input of minority voters. All took place during the November 12, 2021 special session.

First, at the beginning of the meeting, members of the public complained that they were not able to hear the proceedings. In response, Judge Henry threatened, “I will clear you out if you make a noise, I will clear you out of here. I’ve got constables here.”⁶¹ Commissioner Giusti later said of these remarks:

I did not think it was personally the thing to do. I didn't think it was the way to treat people. I mean, asking them to quiet down is one thing, but it to me was a little aggressive.⁶²

Commissioner Giusti later said that he could recall the judge asking a deputy to remove a disruptive individual from a meeting in the past, but not making a comment toward an entire group.⁶³

The second comment occurred in the middle of the meeting. Several members of the audience stood up to request that the commissioners go back to the drawing board and consider new maps that were more favorable to minority voters. In response, Judge Henry said:

If I could address one recurring theme, we don't have time, we must adopt a map by tomorrow according to the secretary of state. That's not our requirement, that's the state of Texas requirement.⁶⁴

The audience rightly noted that the fact that no changes could be made in response to their feedback rendered the meeting pointless. As Wendy Langham said:

After hearing you say that, why do you even have us here? [audience agreement]. You had no intention of changing the map, of even getting our input. I hadn't thought that this was what I was going to say to you, but this seems so dishonest. It's like you're placating us.⁶⁵

As Ms. Langham noted, Judge Henry's comment made it clear that the community's participation at the meeting would have no effect on the outcome.

The final comment occurred near the end of the meeting. As he was calling for a vote on Map 2, Judge Henry said:

We did online questions, some people responded, 440 total responses as of about 12:30 this afternoon . . . of the 440 that came in, 168 did not discuss a particular map they just called me names mostly, of the people who did choose a map preference, Map 1 received

⁶¹ 10:40. “CC Special 11-12-21.”

⁶² Giusti Deposition, p. 250 lines 13-16.

⁶³ Giusti Deposition, p. 252 l 1-3.

⁶⁴ 34:50. “CC Special 11-12-21.”

⁶⁵ 35:04. “CC Special 11-12-21.”

64 responses Map 2 received 208 responses. Of those responding to a particular map, 76.4% Map 2, 23.5[%] Map 1.⁶⁶

On its face, this statement does not seem hostile to the interests of minority voters. But Judge Henry has said he accounted for online public comment by asking for this breakdown from staff.⁶⁷ However, this breakdown only describes the number of comments that supported a particular map. It noticeably does not account for comments that rejected either or both maps, including those that rejected them on the grounds that they were both discriminatory against Galveston’s voters of color. I reviewed and categorized the 446 submissions that came into the County prior to 1:30pm, when the November 12, 2021 meeting on the redistricting maps began. By my estimation, over half of the 168 comments Judge Henry says “did not discuss a particular map” expressed concerns about race and/or minority vote dilution.⁶⁸ In other words, Judge Henry dismissed as devoid of meaningful content nearly every comment that did not support the maps and that expressed concerns about racial discrimination and minority vote dilution.

In sum, these three comments by Judge Henry point to antipathy toward the views of the minority constituency. In the November 12, 2021 meeting, Judge Henry threatened a largely minority audience with forcible removal from the meeting, told them that their input would have no effect on the outcome, and characterized the online feedback in a way that discarded concerns about minority vote dilution and racial discrimination. These comments are especially important in light of the fact that the commissioners in support of Map 2 said very little else during the special session or otherwise during the redistricting process.

C. The “Senate Factors”

Senate Factor 5: Effects of discrimination

Currently, in Galveston County, 57.0% of the population is non-Hispanic White, 12.3% is non-Hispanic Black, and 25.0% is Hispanic.⁶⁹ I have been asked to provide information relevant for evaluating Senate Factor 5, or “the extent to which minority group members bear the effects of discrimination in areas such as education, employment, and health, which hinder their ability to participate effectively in the political process.” In the following section, I will outline the historical and contemporary factors that have shaped racial disparities in socioeconomic status, housing, health, and criminal justice and the ways that these disparities can affect political participation. There are significant gaps between Black, White, and Latino people in Galveston County along each of these dimensions.

⁶⁶ 1:16:44. “CC Special 11-12-21.”

⁶⁷ Henry Deposition 273:15-23.

⁶⁸ These figures are approximations because I do not have the particular coding assigned to each comment by Judge Henry’s staff.

⁶⁹ U.S. Census Bureau. “Citizen Voting Age Population by Race and Ethnicity.” Available online from <https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>. Accessed 20 Jan 2023. For the citizen voting age population in Galveston County, 63.3% are non-Hispanic White, 12.7% are non-Hispanic Black, and 19.2% are Hispanic.

1. Education

People with higher educational attainment are more likely to vote (Almond and Verba 1963, Brady, Verba, and Schlozman 1995, Burden 2009, Campbell et al. 1980, Verba, Schlozman, and Brady 1995b). Verba, Schlozman, and Brady argue that the relationship between socioeconomic status and voting exists because people with greater education also tend to have more of the resources such as time, money, and civic skills that affect the calculus of participation (1995: 282). Education makes it easier for individuals to navigate the costs of voting such as acquiring information about the candidates and issues or learning how to register and vote (Verba, Schlozman, and Brady 1995b).

Black and Latino people historically have faced educational discrimination in Galveston County, which has hindered their ability to vote. Although the U. S. Supreme Court ruled segregation in public schools unconstitutional in *Brown v. Board of Education* in 1954, and Congress outlawed segregation in public accommodations in the Civil Rights Act of 1964, as I will discuss, districts in the county and across the state failed to desegregate for several years after those rulings. For instance, by 1961, the Southern Educational Reporting Service found that in Galveston County, only the Moody State Home had desegregated (Southern Educational Reporting Service 1961, 1961). The process of desegregation did begin later in the 1960s, partly as a result of court orders in the Texas City⁷⁰ and Galveston⁷¹ Independent School Districts (ISD). Eventually, as a result of *United States v. State of Texas*, the entire state was subject to a comprehensive desegregation plan (LBJ School of Public Policy 1982). Galveston ISD did not achieve unitary status until 2009 (Suayan 2009).

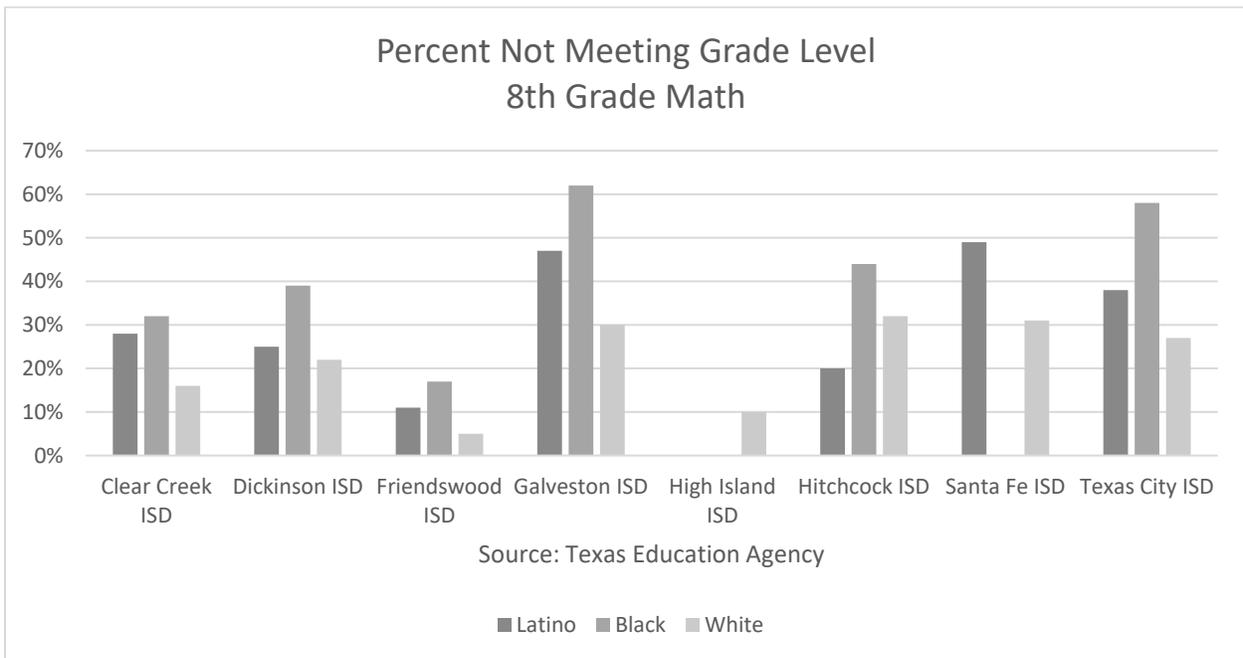
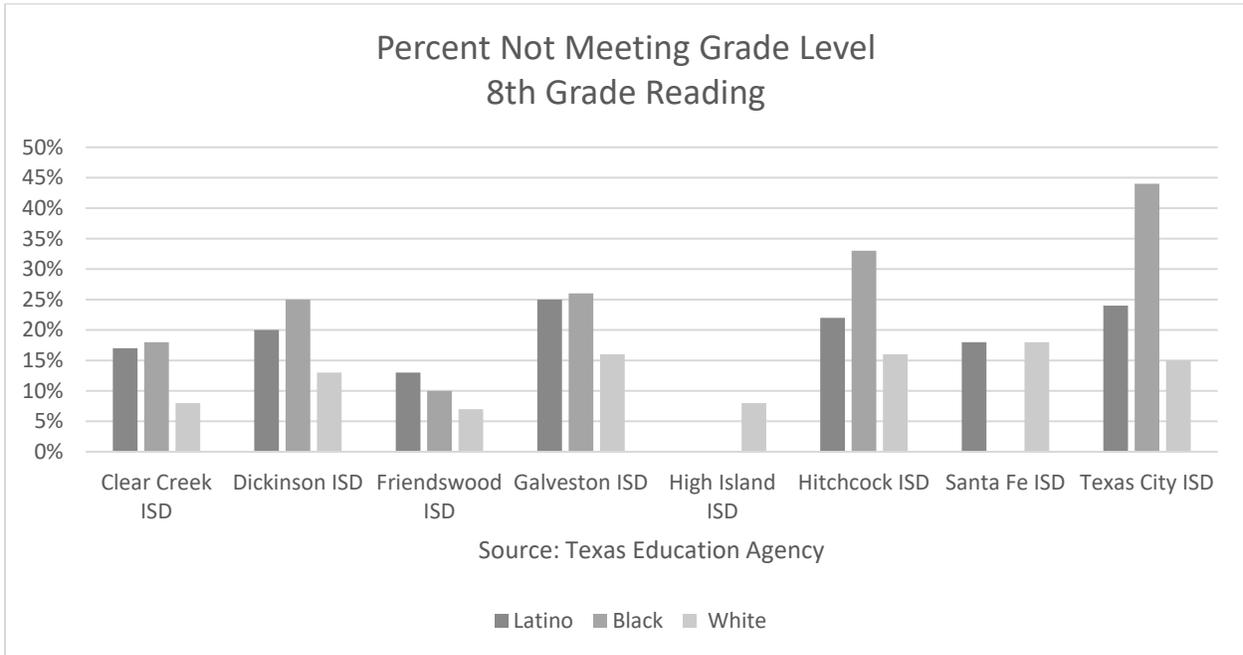
Today, there are eight school districts serving students in Galveston County. These districts range in diversity; High Island ISD and Santa Fe ISD are only 18 and 23% non-White, respectively (2022). Hitchcock ISD, Galveston ISD, Texas City ISD, and Dickinson ISD all are more than 70% non-White (2022). The largest district, Clear Creek ISD, as well as Galveston ISD, is still moderately segregated (ProPublica 2017).

Racial gaps in achievement scores persist in all eight districts that serve the students of Galveston County. According to **Figure 1**, which shows the percent of 8th graders who were not proficient in math and reading for each district, Black and Hispanic students were less likely than White students to be proficient in either subject in all eight school districts (Texas Education Agency 2022). Black and Hispanic students also are less likely to enroll in AP Math classes than their presence in the population would suggest. For instance, in Clear Creek, Black and Hispanic students are 8.2 and 30.9% of the district, but only 3 and 14% of the students enrolled in AP math courses, respectively (U. S. Department of Education 2018).

⁷⁰ *Evans v. Brooks*, Civil No. 2803 (Galveston Div., S.D. Tex.).

⁷¹ *Smiley v. Vollert*, 453 F. Supp. 463 (S.D. Tex. 1978).

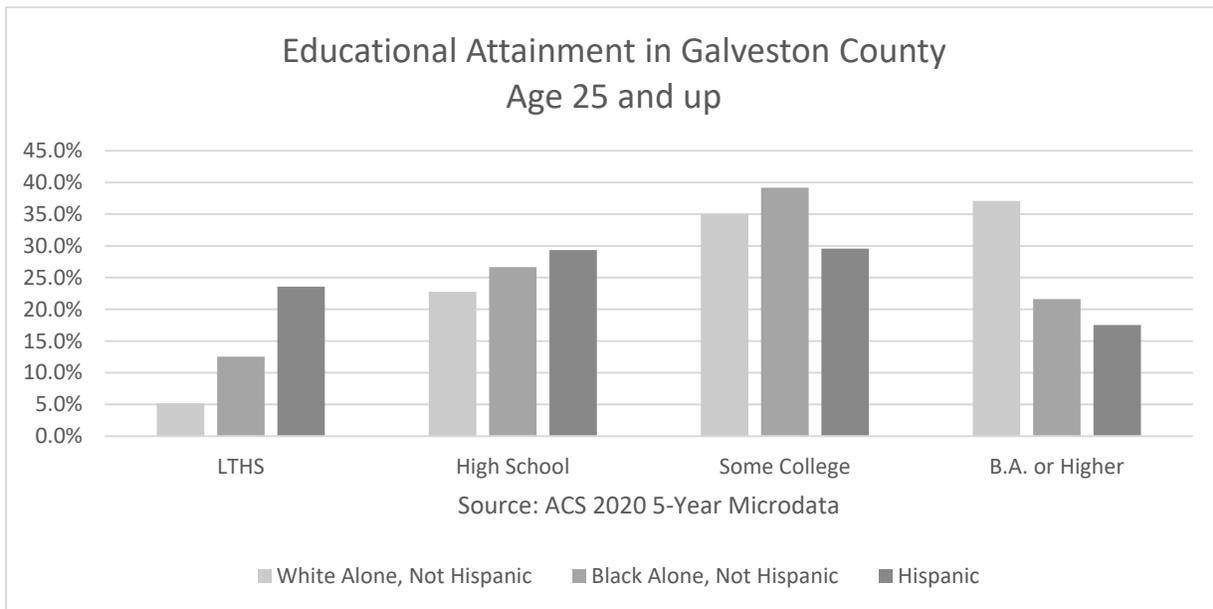
Figure 1: Percent Not Meeting Grade Level, 8th Grade Reading (a) and Math (b).
 Source: Texas Education Agency



School suspensions have been shown to increase subsequent arrests and other anti-social behavior in youth (Mowen and Brent 2016, Hemphill et al. 2006). The evidence suggests that racial disparities in school suspensions exist in Galveston County school districts as well (U. S. Department of Education 2018). For instance, in Clear Creek ISD, Black students are absent three times as many days as White students due to suspensions on a per-capita basis (U. S. Department of Education 2018).

Historical and contemporary educational disparities such as these have led to disparities in educational attainment among the people of Galveston County. Although there have been gains in educational attainment over time, racial gaps persist. **Figure 2** shows estimates of the educational attainment of Galveston County residents over the age of 25 by race, calculated using the 2020 5-Year Public-Use Microdata from the American Community Survey. The data shows that White adults are far more likely than Black and Latino adults in the county to have earned a bachelor's or postgraduate degree, and that Black and Latino Galveston County residents have lower educational attainment overall. As a reminder, 28% of Galveston County residents are age 55 or older, which means that they were school age during the time when districts in Galveston County were still at least partially segregated (U. S. Census Bureau 2022).

Figure 2: Educational Attainment in Galveston County by Race, Age 25 and Up.



2. Income, Poverty, and Wealth

Income and wealth affect voting to the extent that greater income can make it easier to overcome the costs of voting, such as having the ability to afford time off work to go to the polls (Verba, Schlozman, and Brady 1995a). Educational discrimination such as that faced by Black Galveston residents can produce disparities in socioeconomic wellbeing (Long 2010). However, decades of persistent discrimination in employment and access to capital also contribute to economic disparities.

In Galveston County, Black and Hispanic residents are worse off economically than their White counterparts. For instance, as shown in **Figure 3**, the median income of Black Galveston County households, at \$45,831, is more than \$40,000 less than the median income of White households (\$86,165) (County Health Rankings and Roadmaps 2022). White households in Galveston also have a higher median income than that of Latino households, which is \$60,297 (County Health Rankings and Roadmaps 2022). There are racial disparities in child poverty in Galveston County, as well. As shown in **Figure 4**, the poverty rate for Black children in Galveston is 3 times higher than that of White children in the county, and the poverty rate for Latino children is more than 2

times higher than that of White children in Galveston County (County Health Rankings and Roadmaps 2022).

Figure 3: Median Household Income in Galveston County by Race

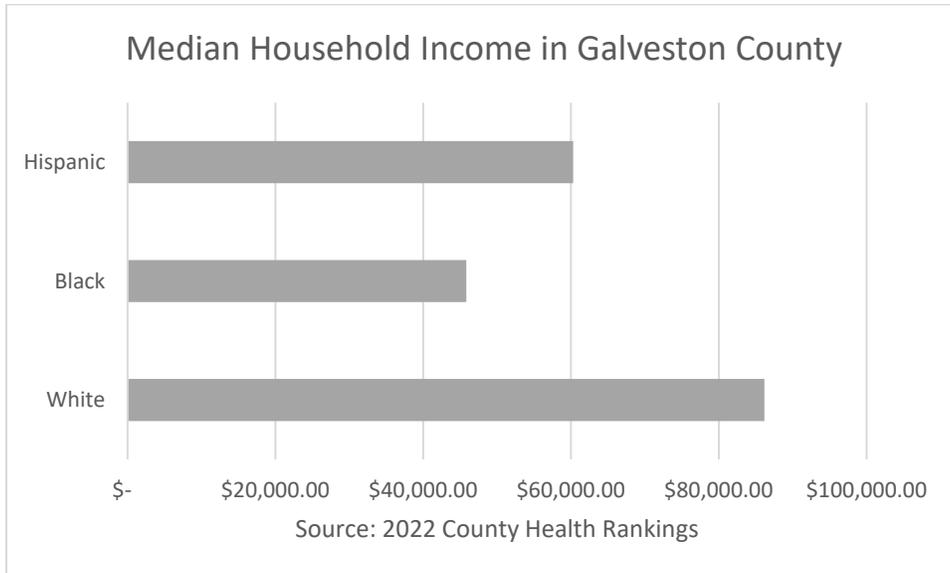
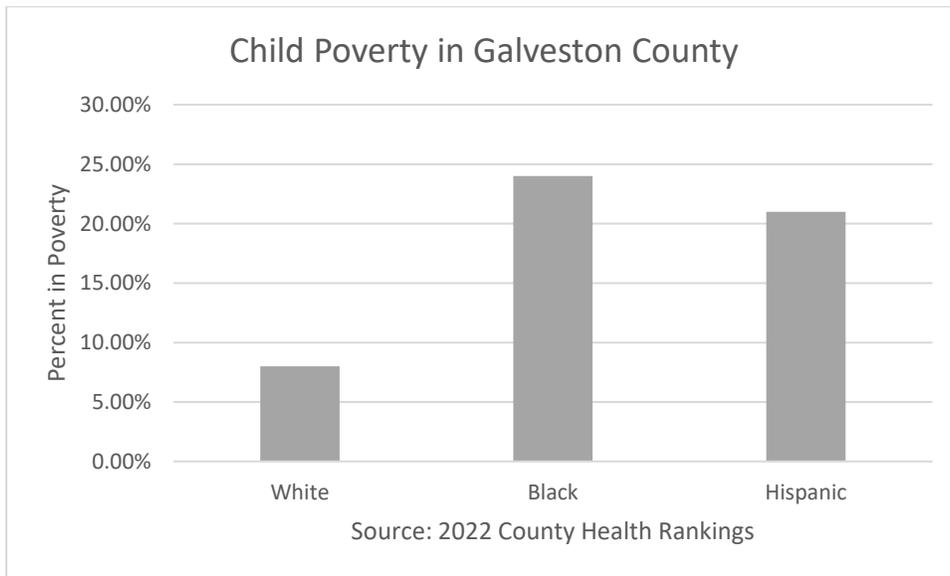
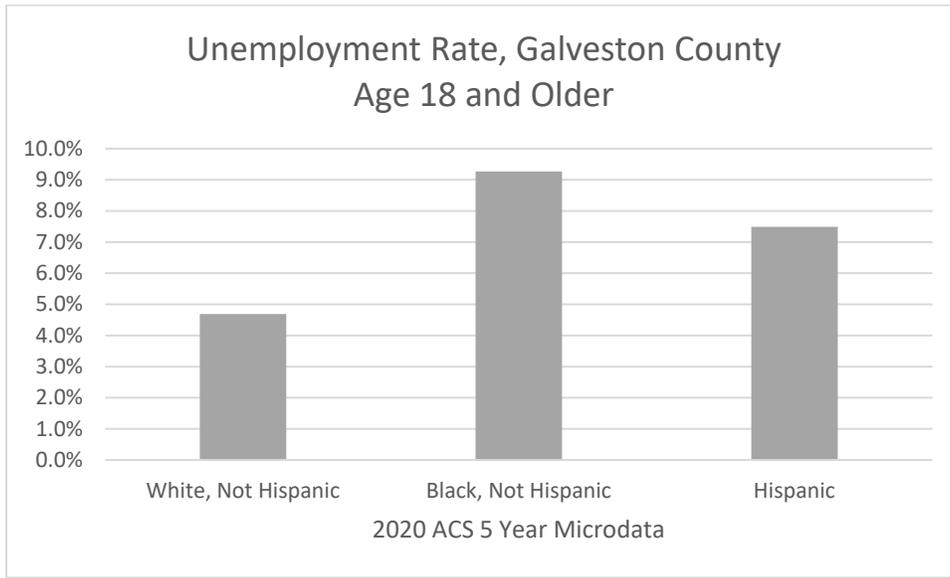


Figure 4: Child Poverty in Galveston County by Race.



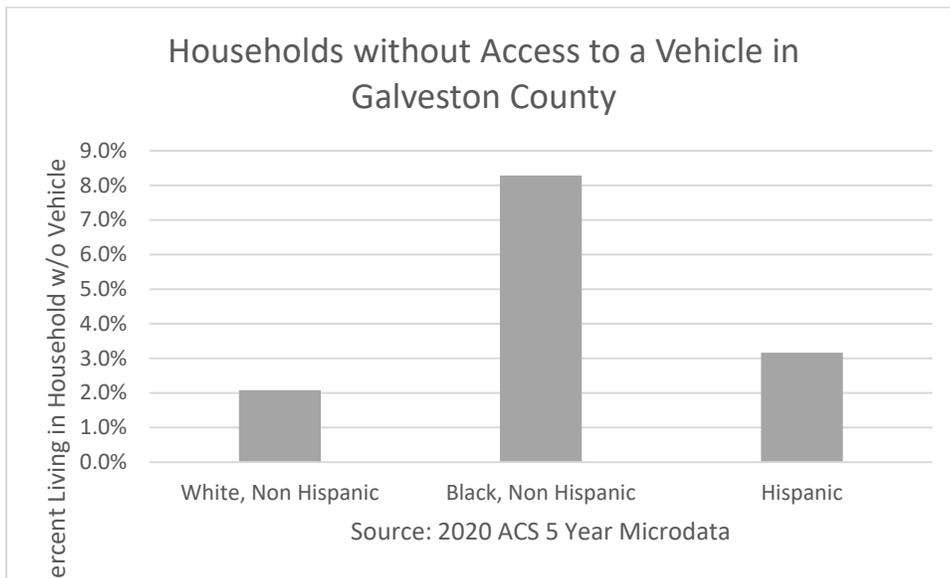
Employment also can affect voter turnout. Rosenstone and Hansen argue that work is an important site for recruitment into politics, which also increases voter turnout (Rosenstone and Hansen 1993). The evidence depicted in **Figure 5** shows that the Black unemployment rate in Galveston County is more than twice that of White Galveston County workers; unemployment is higher for Latinos living in Galveston County as well.

Figure 5: *Unemployment Rate by Race in Galveston County, Age 18 and Older.*



Economic disparities can translate into political disparities some additional ways. One other mechanism is through access to transportation. As **Figure 6** shows, in Galveston County, access to vehicles varies by race, such that Black households are four times more likely to lack access to a vehicle than White households. Latino households are more likely to lack access to a vehicle as well. Studies have shown that polling place distance affects voter turnout, and those effects are related to transportation access (Brady and McNulty 2011, Bagwe, Margitic, and Stashko 2020). In states with no excuse absentee voting, people tend to offset issues accessing physical polling places with voting by mail; however, in states with limited absentee ballot options such as Texas (National Conference of State Legislatures 2022), the “substitution to mail-in voting” is smaller (Bagwe, Margitic, and Stashko 2020: 4).

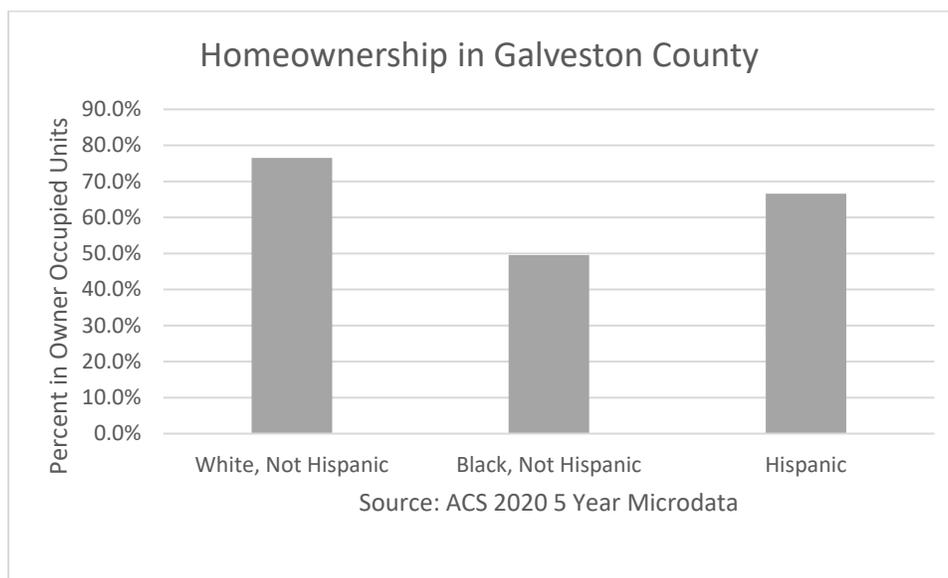
Figure 6: *Households without Access to a Vehicle in Galveston County by Race.*



3. Housing and Racial Residential Segregation

Neighborhood context matters for political mobilization and political outcomes (Burbank 1997, Burch 2013, Cohen and Dawson 1993, Huckfeldt, Plutzer, and Sprague 1993, Huckfeldt 1979, Tam Cho and Rudolph 2008). However, where people live also matters because racial residential segregation has been shown to decrease Black voter turnout. Researchers argue that segregated Black areas have less access to public goods, such as polling places or transportation, that might matter for voting (Zingher and Moore 2019). Racial residential segregation also affects politics indirectly because it is an important determinant of economic and health outcomes. Racial residential segregation increases Black poverty rates, lowers Black educational attainment, and increases income inequality between Black and White residents (Ananat 2011). Research attributes these effects to isolation from quality schools and jobs (Kruse 2013, Massey and Fischer 2006, Wilson 1996). Racial residential segregation also contributes to the test score gap between Black and White students (Reardon, Kalogrides, and Shores 2019), to inequalities in the provision of public goods, to lower public goods expenditures (Trounstine 2016), and to worse health outcomes and greater exposure to environmental toxins (Ard 2016, Kramer and Hogue 2009).

The historical evidence suggests that communities in Galveston County were segregated by race. In particular, Black-White racial residential segregation was high in communities in the county. In the period before World War II, racial residential segregation was the result of lending and insurance practices sanctioned by the Federal Housing Administration (FHA) and private actors. In order to prevent lending to places where Black people lived, the FHA relied on Residential Security Maps that were produced by the Home Owners Loan Corporation (“HOLC”) (2021b). These maps “color-coded neighborhoods using racial composition as a primary indicator of their acceptability as candidates for mortgage investment” (Kimble 2007: 405). The maps assigned grades to neighborhoods based on racial composition, “with ‘A’ being most desirable and a ‘D’ grade ensuring rejection” (Kimble 2007: 405). The HOLC map for Galveston is shown in Figure 7 and follows this traditional grading system for lending based on neighborhood race (2021b). Galveston and Texas City continued to be marked by high racial residential segregation into the 1980s (Hwang and Murdock 1982).

Figure 8: Homeownership in Galveston County by Race.

The second aspect of residence and housing relates to disaster recovery and displacement. In Galveston County, government policies have racialized patterns of resettlement after Hurricane Ike in 2008. Hurricane Ike destroyed 528 public housing units in Galveston City; overall, Galveston City’s Black population decline was three times that of the White population decline in the aftermath of the hurricane (Hamideh and Rongerude 2018). The city resisted rebuilding those housing units for years, and still has not replaced them all despite a court order (Hamideh and Rongerude 2018, Dancy 2018). Displacement after Hurricane Ike has affected minority populations in Galveston County as a whole (Fucile-Sanchez and Davlasheridze 2020). Overall, in the county, the non-Hispanic Black population has declined from 15.0% of the population in 2000 to 12.3% in 2020.

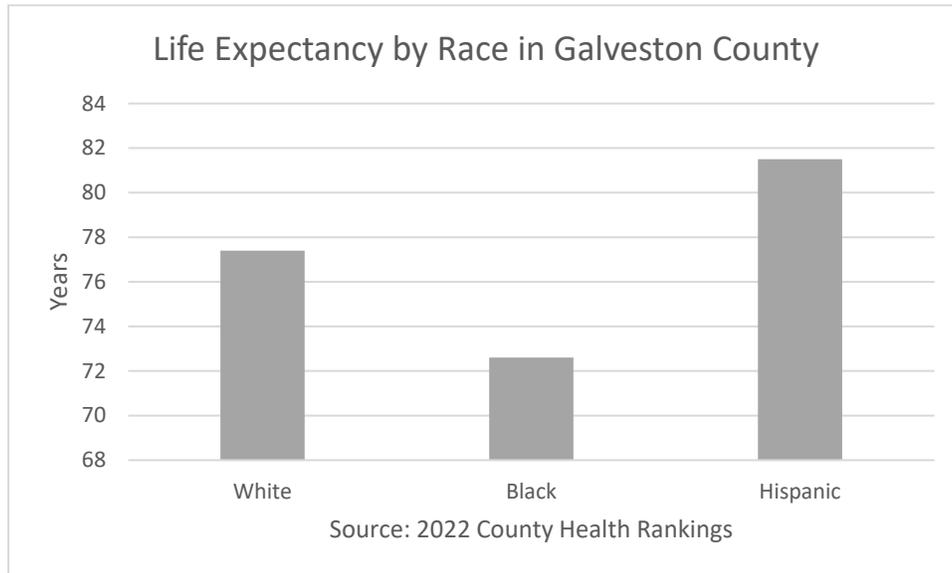
4. Health

Health status also may affect voting. Several studies have associated poor health with lower voter turnout (Blakely, Kennedy, and Kawachi 2001, Lyon 2021, Pacheco and Fletcher 2015). The effects of health on voting may take many pathways, such as reducing the availability of free time and money that could otherwise be devoted to politics (Pacheco and Fletcher 2015). Impaired cognitive functioning or physical disability also may make voting more difficult (Pacheco and Fletcher 2015). Poor health is likely the reason that voter turnout declines in old age (Pacheco and Fletcher 2015). People with disabilities also are less likely to vote; problems with polling place accessibility only partially explain this gap (Schur, Ameri, and Adya 2017, Schur et al. 2002).

Black residents of Galveston County, by many measures, suffer worse health outcomes than both White and Latino households in the county. For instance, premature mortality for Black Galveston County residents, at 572 per 100,000 residents, is higher than that for White (392 per 100,000 residents) and Latino residents (292 per 100,000 residents) (County Health Rankings and Roadmaps 2022). Infant mortality for Black babies in the county is twice as high as that for White and Latino babies (County Health Rankings and Roadmaps 2022). The Black homicide rate is four times higher than the White and Latino homicide rates (County Health Rankings and Roadmaps 2022). Moreover, despite similar incidence rates of invasive cancers, Black invasive cancer

mortality is higher than that of White and Latinos in Galveston County (2020). Overall, health disparities between racial groups in Galveston leads to disparities in life expectancy: as **Figure 9** shows, average life expectancy for Black Galveston County residents is just 72.6 years, compared with 77.4 years for White residents and 81.5 years for Latino residents of the county (County Health Rankings and Roadmaps 2022).

Figure 9: Life Expectancy by Race in Galveston County



5. Criminal Justice

A growing body of research shows that criminal justice interactions affect political behavior. Several studies have shown that, for individuals, contact with the criminal justice system, from police stops, to arrest, to incarceration, directly decreases voter turnout (Burch 2011, Lerman and Weaver 2014, Weaver and Lerman 2010). Primarily, criminal justice contact decreases turnout through “the combined forces of stigma, punishment and exclusion” which impose “barriers to most avenues of influence” and diminish “factors such as civic capacity, governmental trust, individual efficacy, and social connectedness that encourage activity” (Burch 2007: 12).

In Galveston County, criminal justice contact varies by race. Black people in Galveston County are disproportionately likely to be arrested. According to federal data, despite being only 12.3% of the county population, Black people were 21.5% of the people arrested in Galveston County across all reporting agencies in 2016 (Federal Bureau of Investigation 2018).⁷² The disparities in incarceration are even higher: 30.2% of Galveston County Jail inmates are White, 30.0% are Latino, and 39.8% are Black (Bureau of Justice Statistics 2022). It is worth noting that the disparity in incarceration is not explained by the disparity in arrests: Black Galvestonians are a minority of those arrested in the county, but a majority of jail inmates.

Disparities in criminal justice can affect voting through a number of mechanisms, but felony disenfranchisement is an important one. Although most people in Galveston County jail have not

⁷² The data do not report on Hispanic ethnicity for the Galveston agencies.

been convicted of a felony and may vote while incarcerated, many people do not. In fact, jail incarceration can still decrease voting even when a person is not disenfranchised (White 2019).

Racial discrimination accounts for some of this disparity. Studies have shown that racial disparities in arrest are caused by factors that make it more likely that police will stop or search Black people, such as spatially differentiated policing, racial residential segregation, and discrimination (Beckett, Nyrop, and Pfingst 2006, Gelman, Fagan, and Kiss 2007, Ousey and Lee 2008, Pierson et al. 2020). Racial disparities in bail decisions (Arnold, Dobbie, and Yang 2018) and in sentencing also may contribute to incarceration disparities (Bushway and Piehl 2001, Mitchell 2005, Steffensmeier and Demuth 2000, Steffensmeier, Ulmer, and Kramer 1998).

There is evidence of racial discrimination by criminal justice authorities that operate in Galveston County. For instance, in a scene that “evoked images of slavery and the long history of racism and violence by whites against black people,” two White police officers on horseback tied up a mentally ill Black man and paraded through the streets of Galveston (Zaveri 2019). Galveston’s police chief said that the officers exercised “poor judgment” and could have waited for a vehicle to become available (Zaveri 2019). Other incidents raise allegations of racial profiling and police brutality against minority citizens (Heath 2021, Ferguson 2021c).

Senate Factor 6: Racial Appeals in Campaigns

Whether politics is marked by “the use of overt or subtle racial appeals in political campaigns” also is relevant to the consideration of section 2 of the Voting Rights Act. A deep and robust literature on racial appeals in politics exists in political science (Hutchings and Valentino 2004, Stephens-Dougan 2021). Writing in 2001, Mendelberg argued that a “norm of racial equality,” which held that “southern segregation and the ideology of white supremacy were illegitimate” gained ascendance in the U. S. (Mendelberg 2001: 70). The norm of racial equality meant that using explicitly racist rhetoric or espousing explicitly racist policy positions would not help, and may even hurt, politicians (Mendelberg 2001). However, because “racial attitudes are still a potent force in American politics,” candidates still have an incentive to appeal to White racial fears (Valentino, Hutchings, and White 2002: 76). These two phenomena, the need to appear racially egalitarian while activating racial attitudes, means that campaigns would work to activate White voters’ negative racial attitudes through covert or implicit means such as images or coded language (Valentino, Hutchings, and White 2002, Mendelberg 2001).

Implicit racial appeals make racial attitudes and concerns more salient in the minds of voters, even without explicitly mentioning or referring to a particular race or group (Valentino, Hutchings, and White 2002, Mendelberg 2001). Implicit racial appeals may rely on certain code words or issues, use images of minority exemplars, or a combination of both, to make race more salient to voters (Valentino, Hutchings, and White 2002). In particular, Caliendo and McIlwain highlight racist appeals, which “prime antiminority racial fear, resentment, and bias . . . through a variety of audiovisual and textual cues that associate persons of color with long-standing, negative, racial stereotypes” (McIlwain and Caliendo 2014: 1159). These implicit racial appeals can rely on code words such as “inner-city” or “sanctuary city” or reference crime, welfare, and illegal immigration (Brader, Valentino, and Suhay 2008, Collingwood and O'Brien 2019, Hurwitz and Peffley 2005, Valentino, Hutchings, and White 2002). Referring to immigration as racial “invasion” is also a longstanding trope, one that is associated with violence (Lindsay 2018, Collins 2019). More broadly, McIlwain and Caliendo argue that racial appeals in television ads typically include

elements such as, “a salient stereotype, most often those of criminality, laziness, taking undeserved advantage, and the charge of liberalism (read, “extreme” liberal, “dangerously” liberal, “radical,”etc.); a minority opponent’s image; all-White, noncandidate images; and an exposed audience that includes a high percentage of White potential voters” (McIlwain and Caliendo 2014: 1159).

In several instances, political officials in Galveston County have used racialized language privately and publicly against minorities. In 2019, Yolanda Waters, the chairwoman for Galveston County's Republican Party, refused to resign her post after referring to another Black Republican, J. T. Edwards, in private text messages as a “Typical Nig” (Svitek 2019). Ads targeting minorities are commonplace and often contain the “images of minority exemplars” and “certain code words or issues” that Valentino, Hutchings, and White argue increase the salience of ethnicity to voters (Valentino, Hutchings, and White 2002). For instance, campaign materials from Jackie Peden, a candidate for tax assessor in Galveston County, showed an MS-13 gang member and made claims about illegal immigrant voting (the man in the ad was not in Galveston County, nor was he registered as a voter there) (Ferguson 2020b). Ads and materials from several state and congressional legislators also use anti-immigrant language. For instance, Randy Weber has run anti-immigrant ads with minority exemplars, and Brandon Creighton uses invasion language to refer to immigrants.⁷³ Candidates in the Republican primary for State Senate District 11 also used invasion language in reference to immigrants (Natario 2022).

Senate Factor 7: Minority Elected Officials

Minorities are underrepresented relative to their share of the population with respect to Senate factor 7, or “the extent to which members of the minority group have been elected to public office in the jurisdiction.” There have been two Black people and no Latinos elected County Commissioner in Galveston County: Stephen Holmes and his predecessor, Wayne Johnson III, both serving Precinct 3 (Heath 2022). No people of color have served as County Judge.

Dr. Robin Armstrong recently was appointed to serve as the County Commissioner for Precinct 4 after the death of Ken Clark (Heath 2022). The county argues that, because Dr. Armstrong is Black, he represents the needs of minority communities in Galveston (Ferguson 2022). For his part, Dr. Armstrong says he has ties to the Black community in Galveston County. For instance, he says:

“I have very strong relationships in the Black community as my father served on the school board in La Marque ISD for many years and my mother taught school in Galveston for 34 years. I have relationships with Black and Hispanic evangelical pastors and leaders as well through many years of service. I will fight the Democrat narrative about conservative Republicans and educate all communities the value of working together to solve our problems” (Yanez 2022).

However, despite his claims, it is important to note that Dr. Armstrong holds several views that are outside the mainstream of Black Americans. For instance, despite the racial disparities in COVID-19 infections and deaths in Black communities, especially early in the pandemic, Dr. Armstrong advocated for unproven and potentially dangerous treatments over vaccines (Bethel

⁷³ See <https://gopadtracker.com/node/3877> [and https://gopadtracker.com/node/4769](https://gopadtracker.com/node/4769) [for examples.](#)

2021). He is famous for conducting unauthorized “observational” studies of hydroxychloroquine on elderly nursing home patients with COVID-19, in some cases without the knowledge or consent of them or their families (Romo 2020). Dr. Armstrong has made several statements minimizing the importance of racism against Black Americans, such as America is “ ‘not really as racist’ as portrayed” and that “police officers are ‘not racist by and large’” (Bethel 2021). Dr. Armstrong says that the protests in support of Black Lives Matter were more violent than the Capitol Riots (Bethel 2021). For comparison, in the 2021 Pew Survey of Black Americans,⁷⁴ 82% of Black Americans say that racism is an “extremely” or “very big” problem for Black people, and 80% say that police brutality is an “extremely” or “very big” problem. Eighty-three percent of Black Americans express support for the Black Lives Matter movement (DeAngelis 2022). Only 3% of Black Americans say that there is no discrimination against Black Americans. Lopez-Bunyasi and Philpot (2015) argue that Black people are unlikely to support even Black candidates who are racially conservative (Lopez Bunyasi and Wright Rigueur 2015), as Dr. Armstrong appears to be based on these comments.

Dr. Armstrong is aware that he is not aligned with most minorities in Galveston County and does not have their support. He did not receive any endorsements from the NAACP, LULAC, or other minority groups.⁷⁵ When asked, he said that he was not “the minority candidate of choice to represent Precinct 4.”⁷⁶ Dr. Armstrong also disagrees that he “automatically represent[s] your African American constituents just because you yourself are African American.”⁷⁷

Senate Factor 8: Lack of Responsiveness

Under Section 2 of the Voting Rights Act, courts may consider additional factors, such as whether there is a lack of responsiveness on the part of elected officials to the particularized needs of minority group members. The longstanding and persistent gaps in socioeconomic status, incarceration, and health discussed throughout this report demonstrate the lack of responsiveness of public officials to the needs of Galveston’s minority communities. Research has shown that public policies are important for creating and sustaining racial disparities.

It also is the case that Galveston County residents express the belief that certain Galveston public officials are not responsive to them and their needs. In the public meeting on the new redistricting plan, several Galvestonians stood up and expressed their frustration with the County Judge and Commissioners, saying that they felt ignored and disregarded:

Wendy Langham: “After hearing you say that, why do you even have us here? [AUDIENCE AGREEMENT]. You had no intention of changing the map, or even getting our input. I hadn’t thought that this was what I was going to say to you, but this seems so dishonest. It’s like you’re placating us. We don’t matter to you. Juneteenth is something that’s come up in the paper here recently. It

⁷⁴ Pew Research Center. 2022. Topline Questionnaire. <https://www.pewresearch.org/race-ethnicity/2022/08/30/black-americans-have-a-clear-vision-for-reducing-racism-but-little-hope-it-will-happen/#h-black-americans-see-racism-in-our-laws-as-a-big-problem-and-discrimination-as-a-roadblock-to-progress>. Accessed 8 Dec 2022.

⁷⁵ Armstrong Deposition, 55:12-14; 56:8-10; 57:21-23.

⁷⁶ Armstrong Deposition, 91:1-4.

⁷⁷ Armstrong Deposition, 97:10-13.

involves Galveston and Galveston County. That involves us. Us as Black people. You're telling me that I don't matter. I don't like that."⁷⁸

Dr. Edna Courville: "And they could care less! Not only do you portray selfishness, but you're arrogant with it. [CHEERS] You're arrogant. And this arrogance has got to stop. It's all over the nation. It has to stop. You need to stop it. You just disregard people; you act like we don't exist. We exist. Our tax dollars exist."⁷⁹

Tierrisha Gibson: "I have looked and watched your faces the whole time while people have been up here talking, and it's like you're thinking about something else."⁸⁰

Leon Phillips: "[I]t looks as though you're tired of hearing me talk, Mr. Hear me, just listen to what I'm saying."⁸¹

Throughout the evening, when speakers raised concerns such as these, the audience applauded and cheered, indicating their agreement.

Several residents also expressed the belief that they would not be well represented under the new maps by the current commissioners to whom they were being reassigned. For instance:

Wendy Langham: "Now the three of you sitting up there, can you say that you know anything about my life and the way I live? You can't. This man [indicates Commissioner Holmes] does. He's lived it. He lives with us. He helps us. Y'all are doing this [HOLDS UP SIGN THAT READS "Politicians Picking Voters."] Y'all are picking who you want to vote for you so that you get into office. I want to pick who I want to vote for, and I'm telling you right now it's not you."⁸²

Pastor Jerry Lee: "Commissioner Holmes has been a help not only to this precinct, but all over. During storms, during anything, freezes, he's fed folk, everybody has come. He has a strong representation not only in this district. But you know what? You're not gonna treat me the way he treats me. You're not gonna look out for me the way he looks out for me. So I want you to know this, from a minister's point, one day we're all going to have to lay down and die, and we're going to have to answer to God for what we do." [APPLAUSE]⁸³

Dr. Annette Jenkins: "So the maps that you have drawn are very discriminatory and it is going backwards . . . all the things that Commissioner Holmes has done for us . . . we could always go and call him, talk to him, we had a disaster he was

⁷⁸ 35:04. "CC Special 11-12-21."

⁷⁹ 31:20. "CC Special 11-12-21."

⁸⁰ 1:03:10. "CC Special 11-12-21."

⁸¹ 1:05:16. "CC Special 11-12-21."

⁸² 36:18. "CC Special 11-12-21."

⁸³ 33:10. "CC Special 11-12-21."

always there to help us and lend us a helping hand. I can't say that about some of you all that's in here today. . . ."⁸⁴

Mayor Dedrick Johnson: "This decision was made without including a majority side of the table that this vastly affects. Commissioner Stephen Holmes has not only been a good steward of his constituency, but he's been a superhero in his community. He's done things that none of us have ever seen either of you do for Black and brown people." [CHEERS].⁸⁵

Again, the reactions to the comments of these citizens and community leaders suggest that these sentiments reflected those of the audience generally.

With respect to the online comments, over one hundred online comments expressed concerns about racial discrimination and minority voter suppression. For instance, the voter in Submission 1294673 writes:

"I would like a 3rd map option that protects minority voters and gives voice to the actual will of the citizens that line in this area or that you choose map 1 WITHOUT Bolivar. Map 2 should be stricken because it clearly discriminates against race, which is still forbidden. Hopefully we can get rid of political gerrymanderingin [sic] the future and the blatant power grabs by old White men."⁸⁶

People who expressed such concerns about racism overwhelmingly voted against Map 2.

For their part, although the commissioners have paid lip service to representing their minority constituents in theory, in practice they have taken few actions to engage with them. Commissioner Apffel says he never did voter outreach or other events specifically to Black and Hispanic voters⁸⁷ and Commissioner Giusti says that his election materials were printed only in English.⁸⁸ Commissioner Apffel says he is not familiar with issues specific to minority communities:

Q. And based on your experience living in Texas City, and your interactions with the Black and Hispanic communities in Texas City, have you become -- or did you become familiar with the issues most pressing to those communities?

A. That's -- that's been asked. I don't -- I -- I never was able -- I didn't identify any -- any wants, needs, or desires, that those folks had. They would come to me. Then I would have handled them and addressed them. But I --

Q. Did you --

A. -- can't sit here and think of any.⁸⁹

In the past, these commissioners have demonstrated a lack of support for policy stances important to the Black and Hispanic communities, failing to remove confederate statues and funneling \$1.8

⁸⁴ 25:09. "CC Special 11-12-21."

⁸⁵ 46:25. "CC Special 11-12-21."

⁸⁶ DEFS00003646.

⁸⁷ Apffel Deposition, 292:1-3.

⁸⁸ Giusti Deposition, 32:14-16

⁸⁹ Apffel Deposition, 292: 14-25.

million of county dollars toward building a border wall (Ferguson 2021b, 2020a). Commissioner Holmes was the only commissioner to support removing the confederate statue or to reject spending county money on the border wall (Ferguson 2021b, 2020a).

Senate Factor 9: Tenuousness

With respect to Senate Factor 9, or “whether the policy underlying the challenged standard or practice is tenuous,” there are few stated rationales for supporting the adopted plan on the public record. In fact, during the November 12, 2021 special session, again, the only public meeting where the Commissioners Court discussed the maps, the commissioners did not make an opening statement or other remarks to explain why Map 2 (the one that ultimately was adopted) was the best option for the county. As Norman Pappous, a Galveston Republican, said to the commissioners during that November 12, 2021 meeting, “Should these lines be interpreted as an attempt to disenfranchise people in our community, it’s your job to go to them to make sure their voices are heard.”⁹⁰ However, no such explanation was forthcoming. There is some evidence that at least some commissioners stated (1) putting coastal areas into one Commissioner Precinct, (2) public support for Map 2 and (3) the need to equalize population across precincts as a basis for supporting the adopted plan. I consider these three rationales in turn below.

First, County Judge Mark Henry and some commissioners have expressed support for Map 2, the adopted plan, based on consolidating coastal areas into the same precinct. For instance, Judge Henry posted on Facebook that “Having a coastal precinct will ensure that those residents directly along the coast have a dedicated advocate on commissioners court” according to the Galveston Daily News (Ferguson 2021d). Commissioner Apffel agreed in his deposition that a coastal community was intriguing to everybody.⁹¹ However, there is no basis for believing that coastal communities thought that their interests would be served by Map 2. There is little evidence of a push for a coastal precinct coming from the public or community leaders. For instance, several days *after* Judge Henry commented on the benefits of a coastal precinct, the President of the Bolivar Peninsula Chamber of Commerce said, “I think right now, two voices on commissioners court is better than one” (Ferguson 2021e). She reported hearing mixed feedback about the idea of a coastal precinct (Ferguson 2021e). At the time of the Facebook post, the Chamber of Commerce of Bolivar had not yet submitted any feedback regarding the redistricting plans, and no Bolivar meeting took place until the evening of November 11, 2021 (Ferguson 2021e). Likewise, the city of Galveston had not met to discuss a recommendation on the maps when Judge Henry made his social media post (Ferguson 2021e). The online comments also came after this post, and among the comments supporting Map 2, feedback about coastal communities appeared in only a minority. It is worth noting that the Department of Justice says that the county offered a similar justification that the public wanting Bolivar Peninsula and Galveston Island to be joined into coastal precinct to justify the 2011 redistricting; however, even back then “a review of all the audio and video recordings of the public meetings shows that only one person made such a comment.”

It also is worth noting that the desire to draw new maps with a coastal precinct does not necessitate eliminating Precinct 3 as a majority-minority district. The plaintiffs have presented multiple plans

⁹⁰ 27:55. “CC Special 11-12-21.”

⁹¹ Apffel Deposition 184:4-18. It is worth noting that Commissioner Apffel also expressed in his deposition that Bolivar Peninsula was a long drive for him. See Apffel Deposition, 126:18-127:5.

that manage to combine coastal areas into one precinct while maintaining Precinct 3 as a coalition district; several such maps are attached to this report in Appendix B.⁹² Thus the stated goal of creating a new coastal precinct does not justify splitting up racial minorities across the four new precincts.

A second basis for supporting the adopted plan involves public feedback. Judge Henry claims that the public strongly supported Map 2 in the online comments; Commissioner Apffel says that this was an important rationale for voting for this map.⁹³

I have described the implications of Judge Henry's breakdown of the online comments with respect to how he disregards comments that express concerns about minority voting dilution. Here, I want to note that my review of the public comments, contrary to the overwhelming supermajority of support for Map 2 asserted by Judge Henry in the November 12, 2021 meeting, instead shows that the online comments were divided pretty evenly between people who wrote to support Map 2 and those who supported a different option. I classified 218 responses as supportive of Map 2 (including 215 responses for Map 2 and 3 responses in favor of either map). However, I found that 197 people either supported Map 1 as is or opposed one or both maps as outlined in the plans. The remainder of the responses that came in before the 1:30pm meeting did not exert a clear preference. The characterization that "168 people did not discuss a particular map they just called me names" is inaccurate; often they discussed, and rejected, one or both maps.⁹⁴

More importantly, if we consider the online commentary in conjunction with the public comments made at the special session, it is clear that a majority of the people who expressed an opinion through these public venues did not express support for Map 2. I observed that 29 people spoke against the redistricting plans in the November 12 special session, with only one person clearly supporting the plan.

Considering the public commentary reflected in these two venues is important, because the public was otherwise largely shut out of the deliberations as we have seen previously. For instance, there were no other public meetings, and as Commissioner Giusti admits, no surveys of Galveston residents, no consultation with the Black community, no consultation with the Hispanic community or others to see what they wanted.⁹⁵ The meeting on Bolivar took place the evening of November 11, 2021, the night before the special session and long after the redistricting plans had been submitted (Ferguson 2021e).

Finally, a few commissioners have indicated that they were motivated by traditional redistricting principles. For instance, at the April 5, 2021 general meeting of the commissioners court, Commissioner Clark mentioned having to "adhere to the one man one vote rule, the ten percent rule."⁹⁶ Likewise, in his deposition, Commissioner Apffel also said that equalizing the population

⁹² Cooper Declaration pp. 32-37.

⁹³ Apffel Deposition, 192:18-23.

⁹⁴ When asked in his deposition about the meaning of this statement, he said "There are people who don't really care which map it is. They just want to take shots." See Henry Deposition 275:8-12.

⁹⁵ Giusti Deposition, pp. 98-100

⁹⁶ 19:42. "CC REG 04-05-21."

was one important reason for his vote for the adopted plan.⁹⁷ Commissioner Giusti also said that “leveling out the population” was important.⁹⁸ However, the need to balance population across precincts does not require the elimination of the coalition precinct: it is possible to achieve precinct population totals with deviation in the 10% range even in maps that retain a majority-minority precinct in Galveston County. Commissioner Holmes presented the other commissioners with examples of such maps publicly at the November 12, 2021 hearing.

In conclusion, Judge Henry and the Commissioners purported reasoning for adopting the 2021 enacted plan—the desire for a united coastal commissioners precinct and the public support of the adopted plan—are inconsistent with the factual evidence of the redistricting process. Not only is it possible to achieve population deviations in the accepted range even in plans that incorporate a coalition precinct, there is no evidence that coastal communities wanted this change. Nor is there evidence that a majority of the public supported the map the commissioners adopted, especially where a minority of the comments submitted via the online forum and in person during the November 12, 2021 hearing expressed support for the Map 2 that was eventually adopted as the 2021 enacted plan.

* * * * *

I reserve the right to continue to supplement this report upon receiving additional facts, testimony and/or materials that may come to light. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Dated: January 27, 2023



Traci Burch

⁹⁷ Apffel Deposition, 192:18-19.

⁹⁸ Giusti Deposition, 45:24-25.

APPENDIX A: WORKS CITED

1961. A statistical summary, State by State, of segregation-desegregation activity affecting Southern schools from 1954 to present, together with pertinent data on enrollment, teachers, colleges, litigation and legislation. Southern Education Reporting Service.
2020. "Texas Cancer Registry." accessed 4 Dec 2022. <https://www.cancer-rates.info/tx/>.
- 2021a. "COC Annual Meeting and Elections." *Crystal Beach Local News*. Accessed 27 Jan 2023. <https://www.crystalbeachlocalnews.com/coc-annual-meeting-elections/>.
- 2021b. "Mapping Inequality Redlining in New Deal America." University of Richmond Digital Scholarship Lab, accessed 5 Apr 2022. <https://dsl.richmond.edu/panorama/redlining/#loc=5/39.1/-94.58>.
- Almond, Gabriel, and Sidney Verba. 1963. *The Civic Culture*. Princeton: Princeton University Press.
- Ananat, Elizabeth Oltmans. 2011. "The wrong side (s) of the tracks: The causal effects of racial segregation on urban poverty and inequality." *American Economic Journal: Applied Economics* 3 (2):34-66.
- Ard, Kerry. 2016. "By all measures: An examination of the relationship between segregation and health risk from air pollution." *Population and Environment* 38 (1):1-20.
- Arnold, David, Will Dobbie, and Crystal S Yang. 2018. "Racial bias in bail decisions." *The Quarterly Journal of Economics* 133 (4):1885-1932.
- Aulds, T.J. 2011a. "Commissioners to Talk About Redistricting." *The Galveston County Daily News*, 21 June 2011. Accessed 17 Jan 2023.
- Aulds, T.J. 2011b. "Redistricting: How will Commissioners Vote?" *The Galveston County Daily News*, 29 Aug 2011. Accessed 17 Jan 2023.
- Aulds, T.J. 2011c. "Vocal Opposition Grows to Redistricting Plans." *Galveston County Daily News*, 24 Aug 2011. Accessed 25 Jan 2023. https://www.galvnews.com/news/vocal-opposition-grows-to-redistricting-plans/article_683e962f-d9d5-59ec-a8ff-b5ab53cf6713.html.
- Bagwe, Gaurav, Juan Margitic, and Allison Stashko. 2020. Polling Place Location and the Costs of Voting. Working Paper.
- Beckett, Katherine, Kris Nyrop, and Lori Pfingst. 2006. "Race, drugs, and policing: Understanding disparities in drug delivery arrests." *Criminology* 44 (1):105-137.
- Bethel, Brian. 2021. "Armstrong: Republican Party must Defy Democrats' Narrative." *Abilene Reporter News*, 28 May 2021. Accessed 8 Dec 2022. <https://www.reporternews.com/story/news/2021/05/28/armstrong-republican-party-must-defy-democrats-narrative/7488084002/>.
- Billings, Stephen B, Noah Braun, Daniel Jones, and Ying Shi. 2022. "Disparate Racial Impacts of Shelby County v. Holder on Voter Turnout."
- Blakely, Tony A, Bruce P Kennedy, and Ichiro Kawachi. 2001. "Socioeconomic inequality in voting participation and self-rated health." *American journal of public health* 91 (1):99.
- Brader, Ted, Nicholas A Valentino, and Elizabeth Suhay. 2008. "What triggers public opposition to immigration? Anxiety, group cues, and immigration threat." *American Journal of Political Science* 52 (4):959-978.
- Brady, Henry E., and John E. McNulty. 2011. "Turning Out to Vote: The Costs of Finding and Getting to the Polling Place." *The American Political Science Review* 105 (1):115-134. doi: <https://doi.org/10.1017/S0003055410000596>.

- Brady, Henry E., Sidney Verba, and Kay Lehman Schlozman. 1995. "Beyond SES: A Resource Model of Political Participation." *American Political Science Review* Vol. 89, No. 2 (Jun. 1995):271-294.
- Burbank, Matthew J. 1997. "Explaining contextual effects on vote choice." *Political Behavior* 19 (2):113-132.
- Burch, Traci. 2011. "Turnout and Party Registration among Criminal Offenders in the 2008 General Election." *Law and Society Review* 45 (3):699-730.
- Burch, Traci. 2013. *Trading Democracy for Justice: Criminal Convictions and the Decline of Neighborhood Political Participation*. Chicago: University of Chicago Press.
- Burden, Barry C. 2009. "The dynamic effects of education on voter turnout." *Electoral studies* 28 (4):540-549.
- Bureau of Justice Statistics. 2022. Census of Jails, 2019. edited by United States Department of Justice. Office of Justice Programs. Bureau of Justice Statistics.: Inter-university Consortium for Political and Social Research [distributor].
- Bushway, Shawn D, and Anne Morrison Piehl. 2001. "Judging judicial discretion: Legal factors and racial discrimination in sentencing." *Law and Society Review*:733-764.
- Campbell, Angus, Philip E Converse, Warren E Miller, and Donald E Stokes. 1980. *The american voter*: University of Chicago Press.
- Cohen, Cathy J., and Michael C. Dawson. 1993. "Neighborhood Poverty and African-American Politics." *American Political Science Review* 87 (2):286-302.
- Collingwood, Loren, and Benjamin Gonzalez O'Brien. 2019. *Sanctuary cities: The politics of refuge*: Oxford University Press, USA.
- Collins, Ben. 2019. "Investigators Reasonably Confident Texas Suspect Left Anti-Immigrant Screed, Tipped Off Before Attack." *NBC News*, 3 Aug 2019. Accessed 8 Dec 2022. <https://www.nbcnews.com/news/us-news/investigators-reasonably-confident-texas-suspect-left-anti-immigrant-screed-tipped-n1039031>.
- County Health Rankings and Roadmaps. 2022. "Texas Data and Resources." accessed 5 Dec 2022. <https://www.countyhealthrankings.org/explore-health-rankings/texas/data-and-resources>.
- Dancy, Kevin. 2018. Seizing the Opportunity for Equitable and Inclusive Redevelopment. Federal Reserve Bank of Dallas.
- De Rienzo Jr, Salvatore M. 2022. "Shelby County v. Holder and Changes in Voting Behavior." *The American Economist*:05694345221101133.
- DeAngelis, Tori. 2022. Support for Black Lives Matter Remains Stable.
- EdBuild. 2022. "Data Dashboard." EdBuild, accessed 7 Sep 2022. <https://shiny.edbuild.org/apps/edbuild-dashboard/>.
- Feder, Catalina, and Michael G Miller. 2020. "Voter purges after Shelby: Part of special symposium on election sciences." *American Politics Research* 48 (6):687-692.
- Federal Bureau of Investigation. 2018. Uniform Crime Reporting Program Data: Arrests by Age, Sex, and Race, Summarized Yearly, United States, 2016. Inter-university Consortium for Political and Social Research [distributor].
- Ferguson, John Wayne. 2020a. "Confederate Statue Stays Put After Galveston County Commissioners Fail to Vote." *The Galveston County Daily News*, 24 Aug 2020. Accessed 17 January 2023.

- Ferguson, John Wayne. 2020b. "Johnson: Peden Ad Racist, Discriminatory, and a Lie." *The Galveston Daily News*, 22 Feb 2020. Accessed 8 Dec 2022. https://www.galvnews.com/news/article_1f26ee77-55ca-5723-a493-28fdd78f15c5.html.
- Ferguson, John Wayne. 2021a. "Galveston County Commissioners OK Redistricting Map Despite Protest." *The Galveston County Daily News*, 12 Nov 2021. Accessed 17 Jan 2023.
- Ferguson, John Wayne. 2021b. "Galveston County Commits \$1.8M in COVID Relief to Texas Border Security." *The Galveston County Daily News*, 4 Oct 2021. Accessed 17 January 2023.
- Ferguson, John Wayne. 2021c. "Grand Jury Issues Manslaughter Charge Against Galveston County Sheriff's Deputy." *The Galveston Daily News*, 24 Jun 2021. Accessed 8 Dec 2022. https://www.galvnews.com/news/police/free/article_317b2581-b3b0-519b-8e96-201768b5d240.html.
- Ferguson, John Wayne. 2021d. "Political Buzz: County's redistricting might cut out lone Democrat." *Galveston County Daily News*, 3 Nov 2021. Accessed 28 Nov 2022.
- Ferguson, John Wayne. 2021e. "Political Buzz: Does the Coast Want a Single Commissioner? ." *Galveston County Daily News*, 10 November 2021. Accessed 28 Nov 2022.
- Ferguson, John Wayne. 2022. "Galveston County argues Armstrong's appointment makes map suits moot." *The Galveston Daily News*, 17 Jun 2022. Accessed 28 Nov 2022.
- Fucile-Sanchez, Emily, and Meri Davlasheridze. 2020. "Adjustments of Socially Vulnerable Populations in Galveston County, Texas USA Following Hurricane Ike." *Sustainability* 12 (17):7097.
- Gelman, Andrew, Jeffrey Fagan, and Alex Kiss. 2007. "An analysis of the New York City police department's "stop-and-frisk" policy in the context of claims of racial bias." *Journal of the American statistical association* 102 (479):813-823.
- Hamideh, Sara, and Jane Rongerude. 2018. "Social vulnerability and participation in disaster recovery decisions: public housing in Galveston after Hurricane Ike." *Natural Hazards* 93 (3):1629-1648.
- Heath, Keri. 2021. "Group Call Galveston's Slab Weekend Policing Racial Profiling." *The Galveston Daily News*, 4 May 2021. Accessed 8 Dec 2022. https://www.galvnews.com/news/article_e658263a-8187-50a1-a3f8-cf2060cec9ee.html.
- Heath, Keri. 2022. "Armstrong Elected as GOP Pick for Precinct 4 Commissioner." *The Galveston Daily News*, 27 July 2022. Accessed 8 Dec 2022.
- Hemphill, Sheryl A, John W Toumbourou, Todd I Herrenkohl, Barbara J McMorris, and Richard F Catalano. 2006. "The effect of school suspensions and arrests on subsequent adolescent antisocial behavior in Australia and the United States." *Journal of adolescent health* 39 (5):736-744.
- Highton, Benjamin. 2000. "Residential mobility, community mobility, and electoral participation." *Political Behavior* 22 (2):109-120.
- Huckfeldt, R. Robert. 1979. "Political Participation and the Neighborhood Social Context." *American Journal of Political Science* 23 (3):579-592.
- Huckfeldt, Robert, Eric Plutzer, and John Sprague. 1993. "Alternative Contexts of Political Behavior: Churches, Neighborhoods, and Individuals." *Journal Of Politics* 55 (2):365-381.

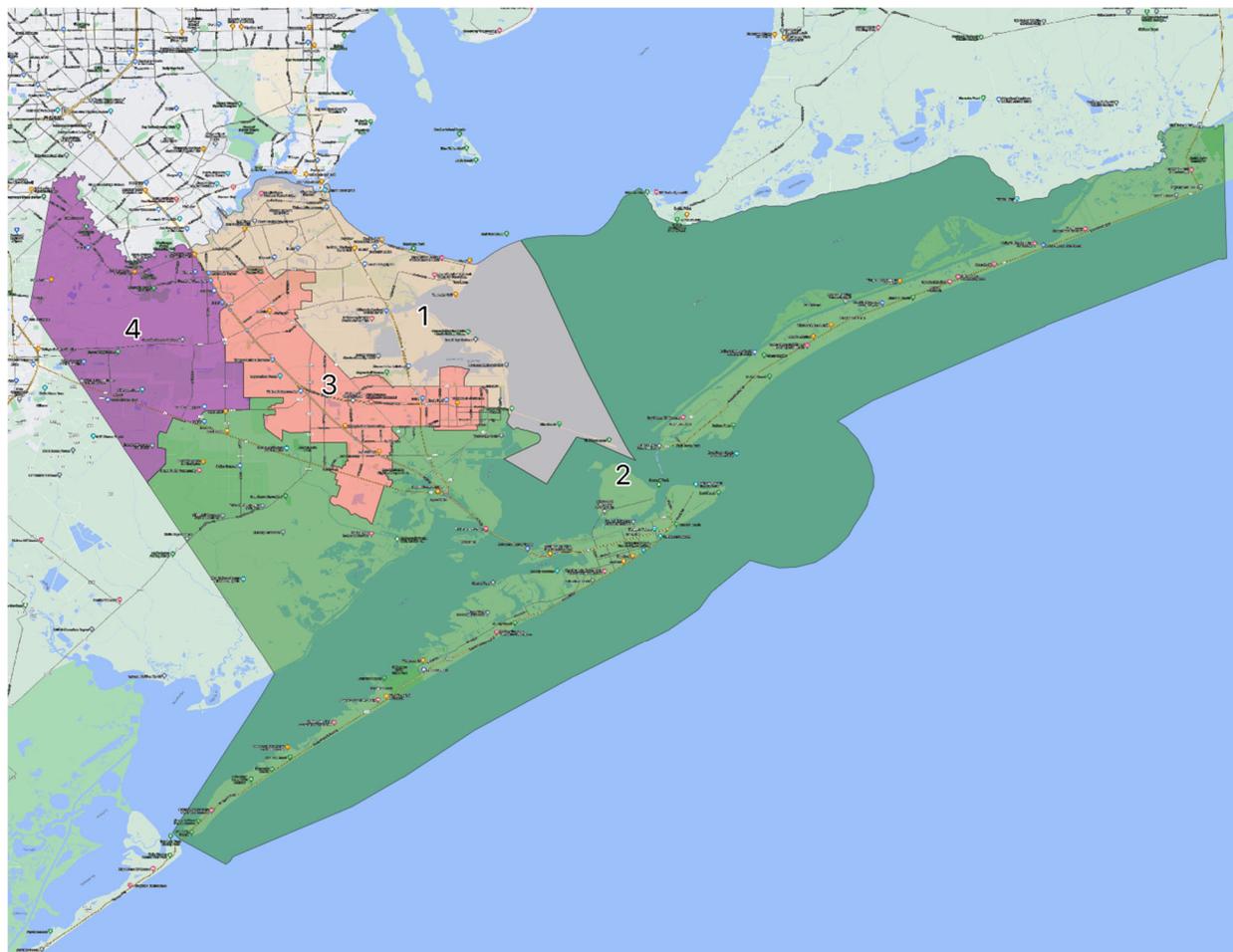
- Hurwitz, Jon, and Mark Peffley. 2005. "Playing the race card in the post–Willie Horton era: The impact of racialized code words on support for punitive crime policy." *Public Opinion Quarterly* 69 (1):99-112.
- Hutchings, Vincent L, and Nicholas A Valentino. 2004. "The centrality of race in American politics." *Annu. Rev. Polit. Sci.* 7:383-408.
- Hwang, Sean-Shong, and Steve H Murdock. 1982. "Residential segregation in Texas in 1980." *Social Science Quarterly* 63 (4):737.
- Kimble, John. 2007. "Insuring inequality: The role of the Federal Housing Administration in the urban ghettoization of African Americans." *Law & Social Inquiry* 32 (2):399-434.
- Kramer, Michael R, and Carol R Hogue. 2009. "Is segregation bad for your health?" *Epidemiologic reviews* 31 (1):178-194.
- Kruse, Kevin M. 2013. *White flight*: Princeton University Press.
- LBJ School of Public Policy. 1982. School Desegregation in Texas: The Implementation of United States v. State of Texas.
- Lerman, Amy E, and Vesla M Weaver. 2014. *Arresting citizenship: The democratic consequences of American crime control*: University of Chicago Press.
- Lindsay, Matthew J. 2018. "The Perpetual Invasion: Past as Prologue in Constitutional Immigration Law." *Roger Williams U. L. Rev.* 23:369.
- Long, Mark C. 2010. "Changes in the returns to education and college quality." *Economics of Education Review* 29 (3):338-347. doi: <https://doi.org/10.1016/j.econedurev.2009.10.005>.
- Lopez Bunyasi, Tehama, and Leah Wright Rigueur. 2015. "'Breaking bad' in black and white: What ideological deviance can tell us about the construction of 'authentic' racial identities." *Polity* 47 (2):175-198.
- Lyon, Gregory. 2021. "The Conditional Effects of Health on Voter Turnout." *Journal of Health Politics, Policy and Law* 46 (3):409-433.
- Massey, Douglas S, and Mary J Fischer. 2006. "The effect of childhood segregation on minority academic performance at selective colleges." *Ethnic and Racial Studies* 29 (1):1-26.
- McIlwain, Charlton D, and Stephen M Caliendo. 2014. "Mitt Romney's racist appeals: How race was played in the 2012 presidential election." *American Behavioral Scientist* 58 (9):1157-1168.
- Mendelberg, Tali. 2001. *The Race Card: Campaign Strategy, Implicit Messages, and the Norm of Equality*. Princeton: Princeton University Press.
- Mitchell, Ojmarrh. 2005. "A Meta-Analysis of Race and Sentencing Research: Explaining the Inconsistencies." *Journal of Quantitative Criminology* 21:439-466.
- Mowen, Thomas, and John Brent. 2016. "School discipline as a turning point: The cumulative effect of suspension on arrest." *Journal of research in crime and delinquency* 53 (5):628-653.
- Natario, Nick. 2022. "Crowded State Senate District 11 Seat in Galveston County Could Pull Austin More to the Right." *ABC 13*, 9 Feb 2022. Accessed 8 Dec 2022. <https://abc13.com/galveston-county-senate-elections-mayes-middleton-bianca-gracia/11549927/>.
- National Conference of State Legislatures. 2022. "Table 2: Excuses to Vote Absentee." accessed 5 Dec 2022. <https://www.ncsl.org/research/elections-and-campaigns/vopp-table-2-excuses-to-vote-absentee.aspx>.
- Othoring and Belonging Institute. 2022. "Technical Appendix." accessed 5 Dec 2022. <https://belonging.berkeley.edu/technical-appendix>.

- Ousey, Graham C, and Matthew R Lee. 2008. "Racial disparity in formal social control: An investigation of alternative explanations of arrest rate inequality." *Journal of Research in Crime and Delinquency* 45 (3):322-355.
- Pacheco, Julianna, and Jason Fletcher. 2015. "Incorporating health into studies of political behavior: Evidence for turnout and partisanship." *Political research quarterly* 68 (1):104-116.
- Pierson, Emma, Camelia Simoiu, Jan Overgoor, Sam Corbett-Davies, Daniel Jenson, Amy Shoemaker, Vignesh Ramachandran, Phoebe Barghouty, Cheryl Phillips, and Ravi Shroff. 2020. "A large-scale analysis of racial disparities in police stops across the United States." *Nature human behaviour* 4 (7):736-745.
- ProPublica. 2017. "Miseducation." accessed 29 Nov 2022.
<https://projects.propublica.org/miseducation/district/4814280>.
- Reardon, Sean F, Demetra Kalogrides, and Kenneth Shores. 2019. "The geography of racial/ethnic test score gaps." *American Journal of Sociology* 124 (4):1164-1221.
- Romo, Vanessa. 2020. "COVID-19 Patients Given Unproven Drug in Texas Nursing Home in Disconcerting Move." *NPR*, 10 Apr 2020. Accessed 8 Dec 2022.
<https://www.npr.org/2020/04/10/830348837/covid-19-patients-given-unproven-drug-in-texas-nursing-home-garnering-criticism>.
- Rosenstone, Steven J., and John Mark Hansen. 1993. *Mobilization, Participation, and Democracy in America*. New York: MacMillan.
- Schur, Lisa, Mason Ameri, and Meera Adya. 2017. "Disability, voter turnout, and polling place accessibility." *Social Science Quarterly* 98 (5):1374-1390.
- Schur, Lisa, Todd Shields, Douglas Kruse, and Kay Schriener. 2002. "Enabling democracy: Disability and voter turnout." *Political Research Quarterly* 55 (1):167-190.
- Southern Educational Reporting Service. 1961. A statistical summary, State by State, of segregation-desegregation activity affecting Southern schools from 1954 to present, together with pertinent data on enrollment, teachers, colleges, litigation and legislation. Southern Education Reporting Service.
- Steffensmeier, Darrell, and Stephen Demuth. 2000. "Ethnicity and Sentencing Outcomes in U.S. Federal Courts: Who is Punished More Harshly?" *American Sociological Review* 65 (5):705-729.
- Steffensmeier, Darrell, Jeffery Ulmer, and John Kramer. 1998. "The Interaction of Race, Gender, and Age in Criminal Sentencing: The Punishment Cost of Being Young, Black, and Male." *Criminology* 36 (4):763-798. doi: 10.1111/j.1745-9125.1998.tb01265.x.
- Stephens-Dougan, LaFleur. 2021. "The Persistence of Racial Cues and Appeals in American Elections." *Annual Review of Political Science* 24:301-320.
- Suayan, John. 2009. "Federal Judge Declares Galveston Schools Finally Desegregated." *Southeast Texas Record*, 5 May 2009. Accessed 29 Nov 2022.
<https://setexasrecord.com/stories/510610985-federal-judge-declares-galveston-schools-finally-desegregated>.
- Svitek, Patrick. 2019. "Top Texas Republicans Pressure a County Chair to Resign Over Racist Text." *Texas Tribune*, 7 Dec 2019. Accessed 8 Dec 2022.
<https://www.texastribune.org/2019/12/07/texas-republicans-racist-text-resign/>.
- Swift, Wes. 2013. "6 Sue County Over the New Maps for JPs." *The Galveston County Daily News*, 27 Aug 2013. Accessed 17 January 2023.

- Tam Cho, Wendy K., and Thomas J. Rudolph. 2008. "Emanating Political Participation: Untangling the Spatial Structure Behind Participation." *British Journal of Political Science* 38:273-289.
- Texas Education Agency. 2022. "STAAR Aggregate Data for 2021-2022." accessed 29 Nov 2022. <https://tea.texas.gov/student-assessment/testing/staar/staar-aggregate-data-for-2021-2022>.
- The Leadership Conference Education Fund. 2019. Democracy Diverted: Polling Place Closures and the Right to Vote.
- Trounstine, Jessica. 2016. "Segregation and inequality in public goods." *American Journal of Political Science* 60 (3):709-725.
- U. S. Census Bureau. 2021. 2020 Census Statistics Highlight Local Population Changes and Nation's Racial and Ethnic Diversity.
- U. S. Census Bureau. 2022. Table S0101: Age and Sex 2021 American Community Survey.
- U. S. Department of Education. 2018. Civil Rights Data Collection. United States Department of Education.
- Valentino, Nicholas A, Vincent L Hutchings, and Ismail K White. 2002. "Cues that matter: How political ads prime racial attitudes during campaigns." *American Political Science Review* 96 (1):75-90.
- Verba, Sidney, Kay Lehman Schlozman, and Henry Brady. 1995a. *Voice and Equality: Civic Voluntarism in American Politics*. Cambridge: Harvard University Press.
- Verba, Sidney, Kay Lehman Schlozman, and Henry E. Brady. 1995b. *Voice and Equality*. Cambridge: Harvard University.
- Weaver, Vesla M, and Amy E Lerman. 2010. "Political consequences of the carceral state." *American Political Science Review* 104 (04):817-833.
- White, Ariel. 2019. "Misdemeanor disenfranchisement? The demobilizing effects of brief jail spells on potential voters." *American Political Science Review* 113 (2):311-324.
- Wilson, William Julius. 1996. *When Work Disappears*. New York: Knopf.
- Yanez, Andy. 2022. "Q&A: Get to Know the Candidates for Texas Senate District 11 Ahead of Primary Election." *Community Impact*, 10 Feb 2022. Accessed 8 Dec 2022. <https://communityimpact.com/houston/pearland-friendswood/government/2022/02/10/qa-get-to-know-the-candidates-for-texas-senate-district-11-ahead-of-primary-election/>.
- Zaveri, Mihir. 2019. "White Officers Who Led Black Man on Rope Won't Face Criminal Charges." *The New York Times*, 19 Aug 2019. Accessed 8 Dec 2022. <https://www.nytimes.com/2019/08/19/us/galveston-rope-donald-neely.html>.
- Zingher, Joshua N, and Eric M Moore. 2019. "The Power of Place? Testing the Geographic Determinants of African-American and White Voter Turnout." *Social Science Quarterly* 100 (4):1056-1071.

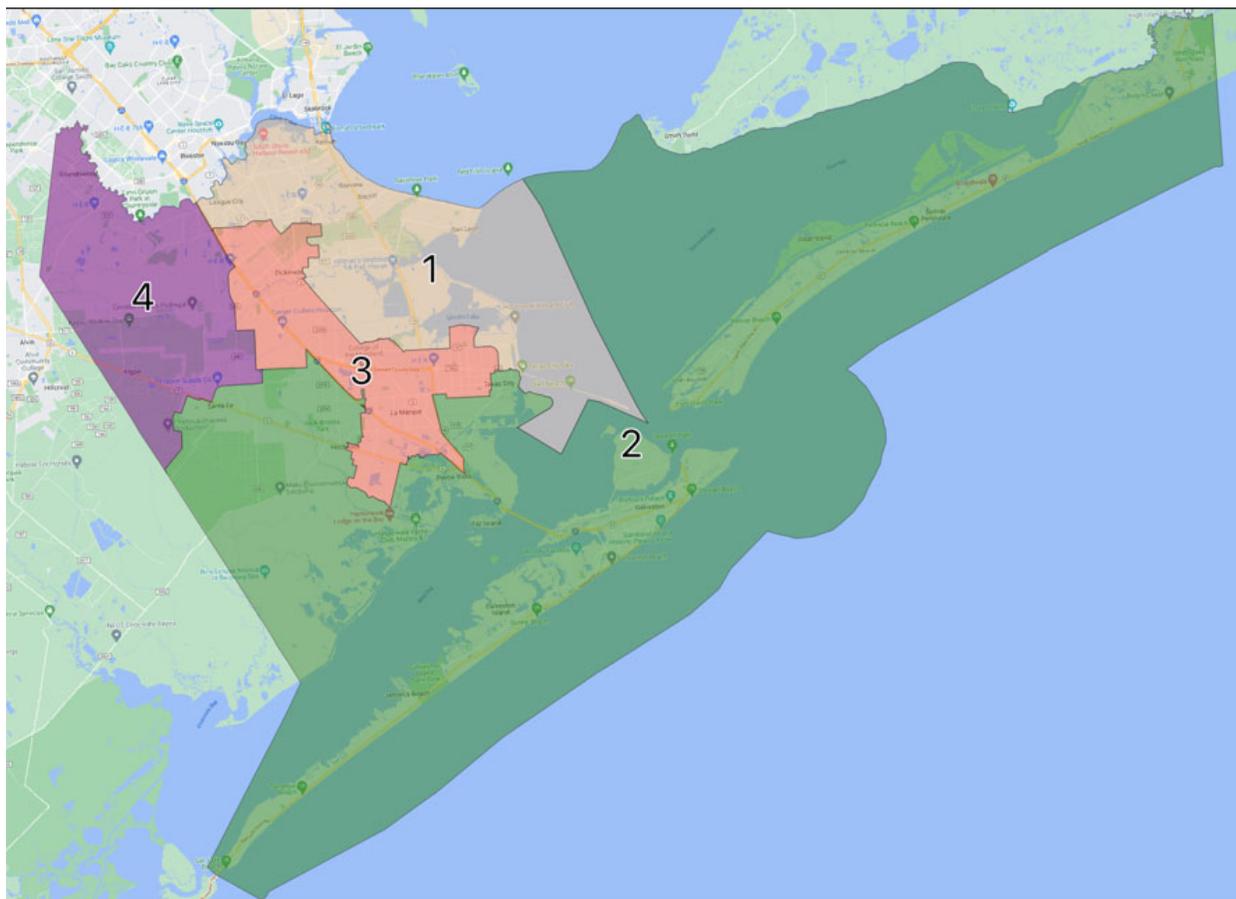
APPENDIX B: ALTERNATIVE MAPS

Alternative Map 1



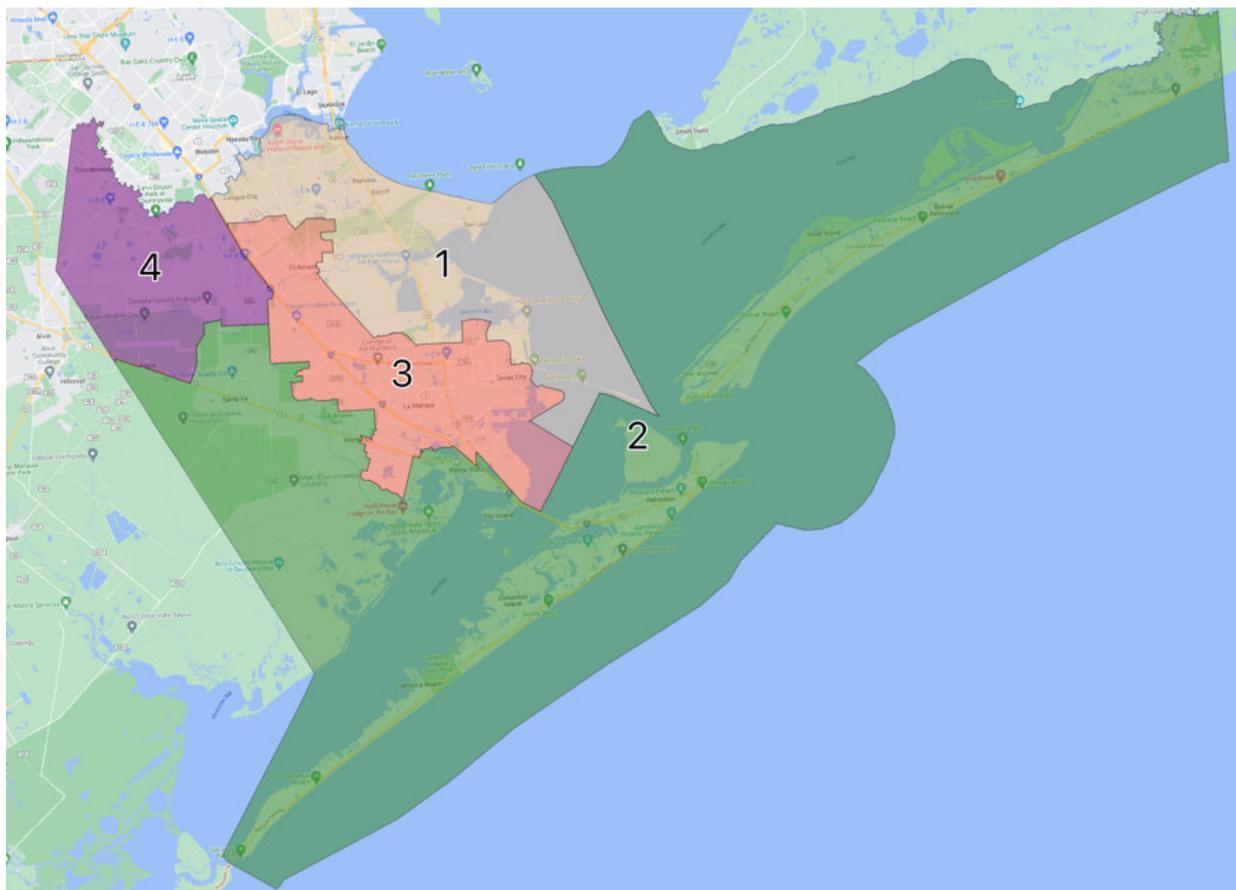
Precinct	Total Population	Anglo CVAP	Non-Anglo CVAP	Hispanic CVAP	Black CVAP	Asian CVAP	Native CVAP
1	88,586	69.9%	30.1%	19.0%	7.3%	3.1%	1.0%
2	87,697	62.4%	37.6%	20.6%	14.5%	1.7%	1.0%
3	86,450	45.9%	54.1%	23.1%	26.4%	3.2%	0.4%
4	87,949	74.5%	25.5%	14.0%	5.2%	4.9%	1.1%

Alternative Map 2



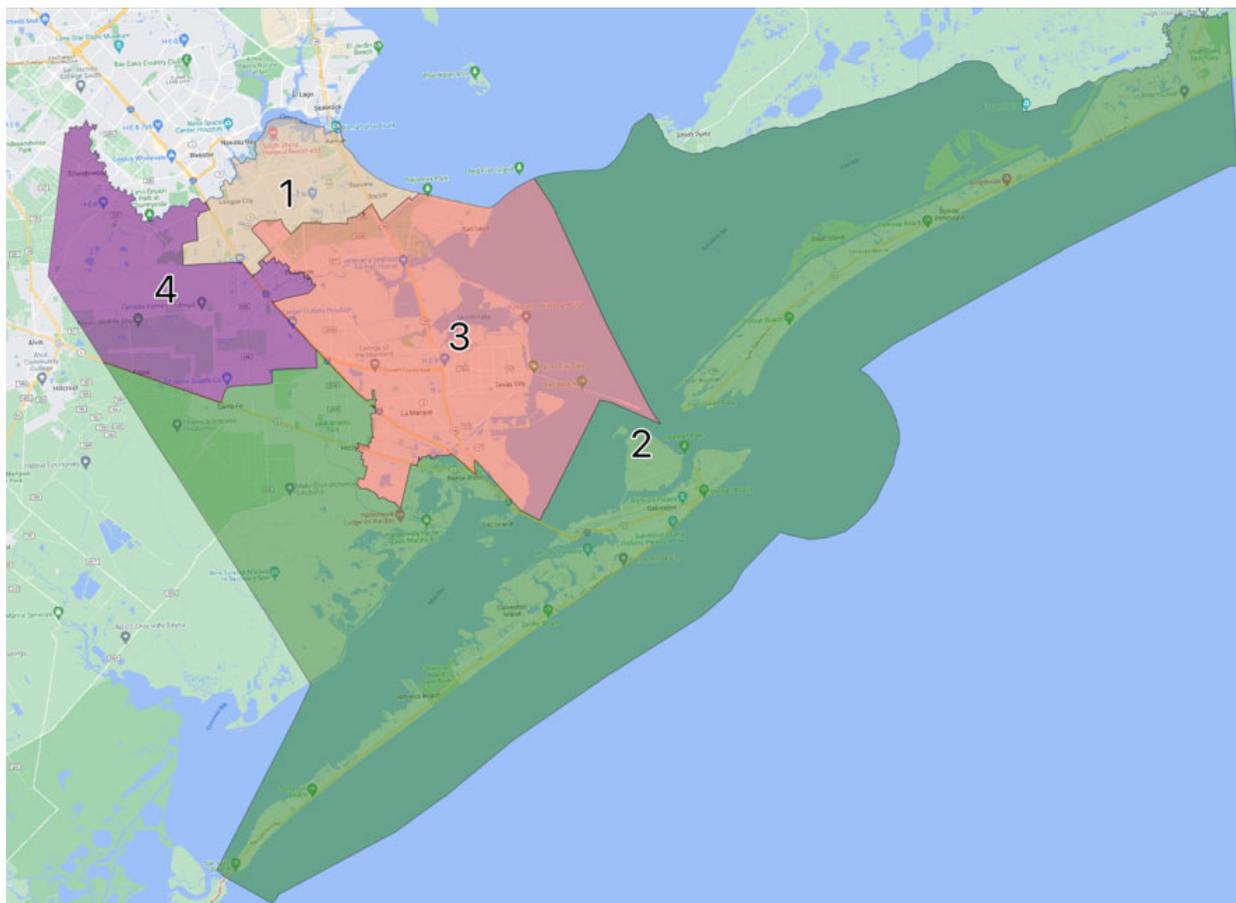
Precinct	Total Population	Anglo CVAP	Non-Anglo CVAP	Hispanic CVAP	Black CVAP	Asian CVAP	Native CVAP
1	88,586	69.9%	30.1%	19.0%	7.3%	3.1%	1.0%
2	87,173	63.5%	36.5%	20.5%	13.1%	2.0%	1.0%
3	86,974	45.1%	54.9%	23.2%	27.5%	2.9%	0.4%
4	87,949	74.5%	25.5%	14.0%	5.2%	4.9%	1.1%

Alternative Map 3



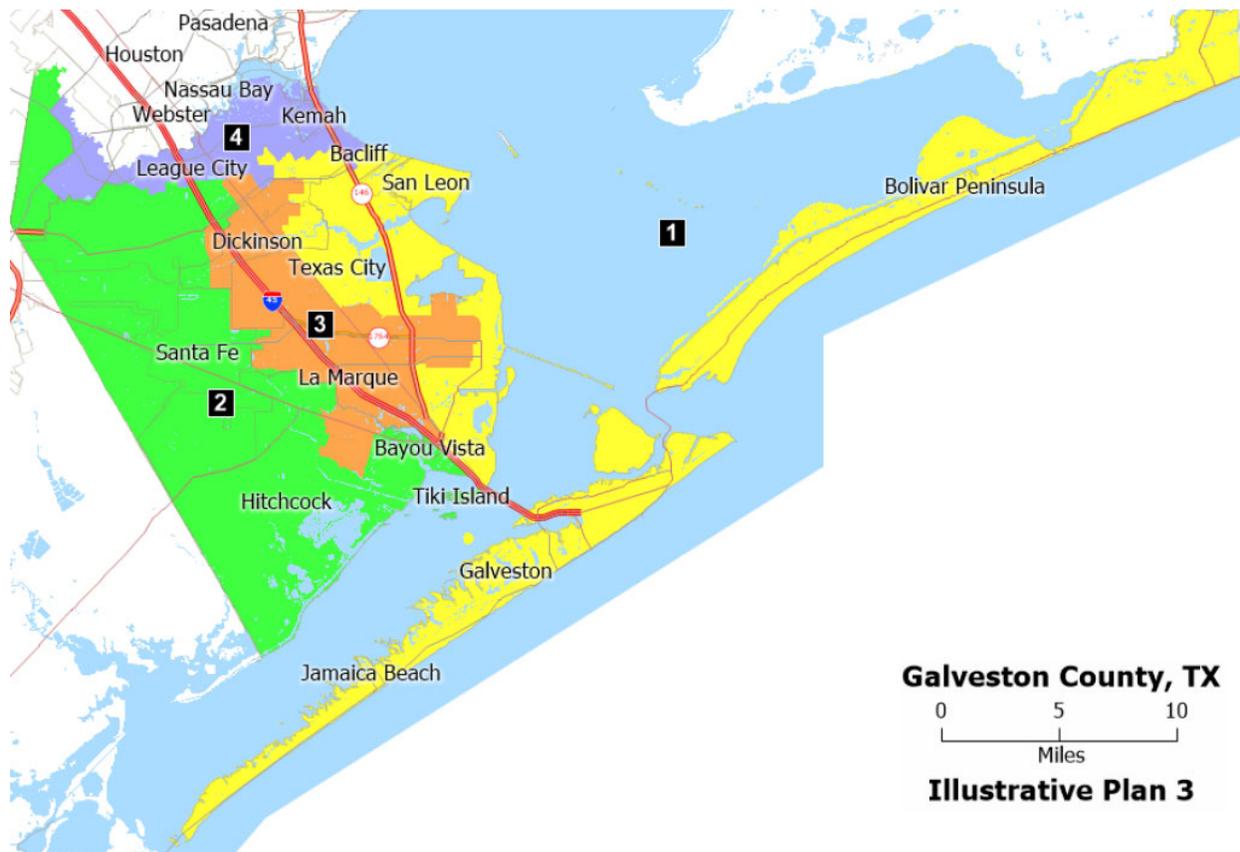
Precinct	Total Population	Anglo CVAP	Non-Anglo CVAP	Hispanic CVAP	Black CVAP	Asian CVAP	Native CVAP
1	88,586	69.9%	30.1%	19.0%	7.3%	3.1%	1.0%
2	87,222	66.1%	33.9%	20.2%	10.9%	1.7%	1.1%
3	87,738	44.0%	56.0%	23.6%	28.3%	2.7%	0.5%
4	87,136	73.5%	26.5%	13.4%	6.4%	5.7%	0.9%

Alternative Map 4



Precinct	Total Population	Anglo CVAP	Non-Anglo CVAP	Hispanic CVAP	Black CVAP	Asian CVAP	Native CVAP
1	89,244	69.7%	30.3%	18.0%	6.4%	4.7%	1.1%
2	87,514	64.1%	35.9%	21.0%	11.9%	2.0%	1.0%
3	87,826	44.9%	55.2%	25.0%	27.7%	1.3%	0.5%
4	86,098	75.7%	24.3%	12.0%	6.3%	5.0%	1.0%

Alternative Map 5 (NAACP Plaintiffs' Illustrative Map 3)



*Population and Demographic information available in expert report of William S. Cooper

Traci Burch

Employment

- Associate Professor, Northwestern University Department of Political Science (2014-Present)
- Research Professor, American Bar Foundation (2007- Present)
- Assistant Professor, Northwestern University Department of Political Science (2007-2014)

Education

- *Harvard University*
Ph.D. in Government and Social Policy
Dissertation: *Punishment and Participation: How Criminal Convictions Threaten American Democracy*
Committee: Jennifer Hochschild (Chair), Sidney Verba, and Gary King
- *Princeton University*
A.B. in Politics, *magna cum laude*

Publications

- Burch, Traci. 2022. "Adding Insult to Injury: the Justification Frame in Official Narratives of Officer-Involved Killings." *Journal of Race, Ethnicity, and Politics*.
- Burch, Traci. 2022. "Officer-Involved Killings and the Repression of Protest." *Urban Affairs Review*.
- Burch, Traci. 2021. "Not All Black Lives Matter: Officer-Involved Deaths and the Role of Victim Characteristics in Shaping Political Interest and Voter Turnout." *Perspectives on Politics*.
- Kay Lehman Schlozman, Philip Edward Jones, Hye Young You, Traci Burch, Sidney Verba, Henry E. Brady. 2018. "Organizations and the Democratic Representation of Interests: What Happens When Those Organizations Have No Members?" *Perspectives on Politics*.
- Burch, Traci. 2016. "Political Equality and the Criminal Justice System." In Resources, Engagement, and Recruitment. Casey Klofstad, ed. Philadelphia: Temple University Press.
- Burch, Traci. 2016. "Review of The First Civil Right by Naomi Murakawa." *The Forum*.

- Kay Lehman Schlozman, Philip Edward Jones, Hye Young You, Traci Burch, Sidney Verba, Henry E. Brady. 2015. "Louder Chorus – Same Accent: The Representation of Interests in Pressure Politics, 1981-2011." In Darren Halpin, David Lowery, Virginia Gray, eds. The Organization Ecology of Interest Communities. New York: Palgrave Macmillan.
- Burch, Traci. 2015. "Skin Color and the Criminal Justice System: Beyond Black-White Disparities in Criminal Sentencing." *Journal of Empirical Legal Studies* 12(3): 395-420.
- Burch, Traci. 2014. "The Old Jim Crow: Racial Residential Segregation and Neighborhood Imprisonment." *Law & Policy* 36(3) 223-255.
- Burch, Traci. 2014. "The Effects of Imprisonment and Community Supervision on Political Participation." Detaining Democracy Special Issue. *The Annals of the American Academy of Political and Social Science* 651 (1) 184-201.
- Burch, Traci. 2013. Trading Democracy for Justice: Criminal Convictions and the Decline of Neighborhood Political Participation. Chicago: University of Chicago Press.
- Hochschild, Jennifer, Vesla Weaver, and Traci Burch. 2012. Transforming the American Racial Order. Princeton: Princeton University Press.
- Schlozman, Kay Lehman, Sidney Verba, Henry Brady, Traci Burch, and Phillip Jones. 2012. "Who Sings in the Heavenly Chorus? The Shape of the Organized Interest System." In Schlozman, Kay Lehman, Sidney Verba, and Henry Brady, The Unheavenly Chorus, Princeton: Princeton University Press.
- Schlozman, Kay Lehman, Sidney Verba, Henry Brady, Phillip Jones, and Traci Burch. 2012. "Political Voice through Organized Interest Activity." In Schlozman, Kay Lehman, Sidney Verba, and Henry Brady, The Unheavenly Chorus, Princeton: Princeton University Press.
- Burch, Traci. 2012. "Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout and Party Registration of Florida's Ex-Felons." *Political Behavior* 34 (1); 1-26.
- Burch, Traci. 2011. "Turnout and Party Registration among Criminal Offenders in the 2008 General Election." *Law and Society Review* 45(3): 699-730.
- Burch, Traci. 2011. "Fixing the Broken System of Financial Sanctions." *Criminology and Public Policy* 10(3).
- Hochschild, Jennifer; Vesla Weaver, and Traci Burch. 2011. "Destabilizing the American Racial Order." *Daedalus* 140; 151-165.

- Burch, Traci. 2009. “Can the New Commander-In-Chief Sustain His All Volunteer Standing Army?” *The Dubois Review on Race* 6(1).
- Burch, Traci. 2009. “Review of *Imprisoning Communities*, by Todd Clear.” *Law and Society Review* 43(3) 716-18.
- Burch, Traci. 2009. “American Politics and the Not-So-Benign Neglect of Criminal Justice,” in *The Future of American Politics*, ed. Gary King, Kay Schlozman, and Norman Nie. (New York: Routledge).
- Schlozman, Kay Lehman and Traci Burch. 2009. “Political Voice in an Age of Inequality,” in *America at Risk: Threats to Liberal Self-Government in an Age of Uncertainty*, ed. Robert Faulkner and Susan Shell (Ann Arbor: University of Michigan Press).
- Hochschild, Jennifer and Traci Burch. 2007. “Contingent Public Policies and the Stability of Racial Hierarchy: Lessons from Immigration and Census Policy,” in *Political Contingency: Studying the Unexpected, the Accidental, and the Unforeseen*, ed. Ian Shapiro and Sonu Bedi (New York: NYU Press).

Grants

- Co-Principal Investigator. “Fellowship and Mentoring Program on Law and Inequality.” September 1, 2020 to August 31, 2023. \$349, 313. National Science Foundation.

Honors and Fellowships

- American Political Science Association 2014 Ralph J. Bunche Award (for *Trading Democracy for Justice*).
- American Political Science Association Urban Section 2014 Best Book Award (for *Trading Democracy for Justice*).
- American Political Science Association Law and Courts Section 2014 C. Herman Pritchett Award (for *Trading Democracy for Justice*).
- Research grant, Stanford University Center for Poverty and Inequality (2012).
- American Political Science Association E. E. Schattschneider Award for the best doctoral dissertation in the field of American Government (2009)
- American Political Science Association William Anderson Award for the best doctoral dissertation in the field of state and local politics, federalism, or intergovernmental relations (2008)

- American Political Science Association Urban Section Best Dissertation in Urban Politics Award (2008)
- Harvard University Robert Noxon Toppan Prize for the best dissertation in political science (2007)
- Institute for Quantitative Social Sciences Research Fellowship (2006-07)
- *European Network on Inequality* Fellowship (2005)
- Research Fellowship, The Sentencing Project (2005)
- Doctoral Fellow, Malcolm Weiner Center for Inequality and Social Policy (2004-07)

Professional Service

- APSA Law and Courts Section Best Paper Award Committee (2020-2021)
- APSA Elections, Public Opinion, and Voting Behavior Executive Committee (2020-2023)
- General Social Survey Board of Overseers (2020-2025)
- APSA Kammerer Prize Committee (2017)
- Associate Editor, *Political Behavior* (2015-2019)
- APSA Law and Courts Section, Lifetime Achievement Award Prize Committee (2014-2015)
- Law and Society Association, Kalven Prize Committee (2013-2014)
- American Political Science Association, Urban Politics Section Dissertation Prize Committee (2012-13)
- American Political Science Association, Urban Politics Section Executive Committee (2012-13)
- Law and Society Association Diversity Committee, (2012-2013)
- American Political Science Association, Urban Politics Section Program Co-Chair (2011)
- Associate Editor, *Law and Social Inquiry*
- American Political Science Association, Urban Politics Section Book Prize Committee (2009)

- Reviewer for *The American Political Science Review*, *Public Opinion Quarterly*, *American Politics Research*, and *Time-Sharing Experiments in the Social Sciences*.

Presentations and Invited Talks

- American Political Science Association Annual Conference, Montreal, Canada. “Not All Black Lives Matter: Officer-Involved Deaths and the Role of Victim Characteristics in Shaping Political Interest and Voter Turnout.” September 2022.
- University of Pennsylvania. Virtual. “Voice and Representation in American Politics.” April 2021.
- University of Michigan. Virtual. “Which Lives Matter? Factors Affecting Mobilization in Response to Officer-Involved Killings.” February 2021.
- University of Pittsburgh. Virtual. “Policing and Participation.” November 2020.
- Hamilton College Constitution Day Seminar. Virtual. “Racial Protests and the Constitution.” September 2020.
- New York Fellows of the American Bar Foundation. New York, NY. “Police Shootings and Political Participation.” March 2020.
- Pennsylvania State University, State College, PA. “Effect of Officer Involved Killings on Protest. November 2019.
- Princeton University. Princeton NJ. “Effects of Police Shootings on Protest among Young Blacks.” November 2019.
- Missouri Fellows of the American Bar Foundation. Branson, MO. Police Shootings and Political Participation in Chicago. September 2019.
- Northwestern University. “Police Shootings and Political Participation.” November, 2018.
- Princeton University. Princeton, NJ. “Police Shootings and Political Participation.” September, 2018.
- University of California at Los Angeles. Los Angeles, CA. “Police Shootings and Political Participation.” August, 2018.
- American Bar Association Annual Meeting. Chicago, IL. “Police Shootings and Political Participation.” August 2018.
- American Bar Endowment Annual Meeting. Lexington, KY. “Effects of Police Shooting

in Chicago on Political Participation.” June 2018.

- Vanderbilt University. “Effects of Police Shootings in Chicago on Political Participation.” April 2018.
- Washington University in St. Louis. “Effects of Pedestrian and Auto Stops on Voter Turnout in St. Louis.” February 2018.
- Fellows of the American Bar Foundation, Los Angeles. “Assaulting Democracy.” January 2018.
- Northwestern University Reviving American Democracy Conference. Panel presentation. “Barriers to Voting.” January 2018.
- University of Illinois at Chicago. “Effects of Police Shootings in Chicago on Political Participation.” October, 2017.
- Chico State University. “Constitution Day Address: Policing and Political Participation.” September, 2017.
- Fellows of the American Bar Foundation, Atlanta, Georgia. “Policing in Georgia.” May 2017.
- United States Commission on Civil Rights. Testimony. “Collateral Consequences of Mass Incarceration.” May 2017.
- Northwestern University Pritzker School of Law. “Effects of Police Stops of Cars and Pedestrians on Voter Turnout in St. Louis.” April 2017.
- University of California at Los Angeles. Race and Ethnic Politics Workshop. “Effects of Police Stops of Cars and Pedestrians on Voter Turnout in St. Louis.” March 2017.
- University of North Carolina at Chapel Hill. American Politics Workshop. “Effects of Police Stops of Cars and Pedestrians on Voter Turnout in St. Louis.” February 2017.
- National Bar Association, St. Louis MO. “Political Effects of Mass Incarceration.” July 2016.
- Harvard University, Edmond J. Safra Center for Ethics. Inequalities/Equalities in Cities Workshop. April 2016.
- American Political Science Association Annual Meeting. September 2015. “Responsibility for Racial Justice.” Discussant.

- St. Olaf College. April 2015. “The Collateral Consequences of Mass Incarceration.”
- Northwestern University. Institute for Policy Research. February 2015. “The Civic Culture Structure.”
- Texas A&M University. Race, Ethnicity, and Politics Workshop. September 2014. “Trading Democracy for Justice.”
- Columbia University Teachers College. The Suburban Promise of Brown Conference. May 2014. “Can We All Get Along, Revisited: Racial Attitudes, the Tolerance for Diversity, and the Prospects for Integration in the 21st Century.”
- University of Kentucky. Reversing Trajectories: Incarceration, Violence, and Political Consequences Conference. April 2014. “Trading Democracy for Justice.”
- University of Chicago. American Politics Workshop. March 2014. “How Geographic Differences in Neighborhood Civic Capacity Affect Voter Turnout.”
- Kennedy School of Government, Harvard University. February 2014. “Trading Democracy for Justice.”
- University of Michigan. American Politics Workshop. December 2013. “Trading Democracy for Justice.”
- Yale University. American Politics and Public Policy Workshop. September 2013. “Trading Democracy for Justice.”
- American Political Science Association Annual Meeting. August 2013. “The Heavenly Chorus Is Even Louder: The Growth and Changing Composition of the Washington Pressure System.” With Kay Lehman Schlozman, Sidney Verba, Henry Brady, and Phillip Jones.
- National Bar Association, Miami Florida, July 2013. “The Collateral Consequences of Mass Imprisonment.”
- Loyola University. American Politics Workshop. December 2012. “Mass Imprisonment and Neighborhood Voter Turnout.”
- Marquette University School of Law. November 2012. “The Collateral Consequences of Mass Imprisonment.”
- Yale University. Detaining Democracy Conference. November 2012. “The Effects of Imprisonment and Community Supervision on Political Participation.”

- Brown University. American Politics Workshop. October 2012. “Mass Imprisonment and Neighborhood Voter Turnout.”
- American Bar Association National Meeting, August 2012. “Mass Imprisonment: Consequences for Society and Politics.”
- University of Madison-Wisconsin. American Politics Workshop. March 2012. “The Spatial Concentration of Imprisonment and Racial Political Inequality.”
- American Political Science Association Annual Meeting. 2011. “Theme Panel: How Can Political Science Help Us Understand the Politics of Decarceration?”
- University of Pennsylvania. Democracy, Citizenship, and Constitutionalism Conference. April, 2011. “Vicarious Imprisonment and Neighborhood Political Inequality.”
- University of Chicago School of Law. Public Laws Colloquium. Chicago, IL. November, 2010. ““The Effects of Neighborhood Incarceration Rates on Individual Political Efficacy and Perceptions of Discrimination.”
- Pomona College. November, 2010. “Incarceration Nation.”
- University of Washington. Surveying Social Marginality Workshop. October 2010. “Using Government Data to Study Current and Former Felons.”
- American Bar Foundation, Chicago, IL, September 2010. “The Effects of Neighborhood Incarceration Rates on Individual Political Attitudes.”
- Northwestern University. Chicago Area Behavior Conference. May 2010. “Trading Democracy for Justice: The Spillover Effects of Incarceration on Voter Turnout in Charlotte and Atlanta.”
- Annual Meeting of the Law and Society Association, Chicago, IL, May 2010. “Neighborhood Criminal Justice Involvement and Voter Turnout in the 2008 General Election.”
- Annual Meeting of the Southern Political Science Association, Atlanta, GA, January 2010. “The Art and Science of Voter Mobilization: Grassroots Perspectives on Registration and GOTV from Charlotte, Atlanta, and Chicago.”
- University of Illinois at Chicago. Institute for Government and Public Affairs. November 2009. “Turnout and Party Registration among Convicted Offenders during the 2008 Presidential Election.”

- Annual Meeting of the American Political Science Association, Toronto, Ontario, Canada, September 2009. "I Wanted to Vote for History: Turnout and Party Registration among Convicted Offenders during the 2008 Presidential Election."
- Harris School of Public Policy, University of Chicago. American Politics Workshop. December 2008. "Trading Democracy for Justice? The Spillover Effects of Imprisonment on Neighborhood Voter Participation."
- Northwestern University School of Law. Law and Political Economy Colloquium. November 2008. "Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout Rates and Candidate Preferences of Florida's Ex-Felons."
- University of California, Berkeley. Center for the Study of Law and Society. October 2008. "Trading Democracy for Justice? The Spillover Effects of Imprisonment on Neighborhood Voter Participation."
- Law and Society Association Annual Meeting, Montreal, Canada, May 2008. "Did Disfranchisement Laws Help Elect President Bush? New Evidence on the Turnout Rates and Candidate Preferences of Florida's Ex-Felons."
- Law and Society Association Annual Meeting, Montreal, Canada, May 2008. "Trading Democracy for Justice? The Spillover Effects of Imprisonment on Neighborhood Voter Participation."
- Midwest Political Science Association Conference, Chicago, IL, April 2007. Paper: "Concentrated Incarceration: How Neighborhood Incarceration Decreases Voter Registration."

Working Papers Under Review

- "Introduction" (with Jenn Jackson and Periloux Peay) in *Freedom Dreams: A Symposium on Abolition*. Eds. Jenn Jackson, Periloux Peay, and Traci Burch. Social Science Quarterly.
- "The Effects of Community Police Performance on Protest in Chicago" (For Symposium Honoring John Hagan)
- Which Lives Matter?

Additional Activities

- Expert witness in *Kelvin Jones vs. Ron DeSantis, etc. et al.* (U.S. District Court for the Northern District of Florida Consolidated Case No. 4:19-cv-00).

- Expert witness in *Community Success Initiative, et al., Plaintiffs v. Timothy K. Moore* (Superior Court, Wake County, NC Case No. 19-cv-15941).
- Expert witness in *People First of Alabama v. Merrill* (U.S. District Court in Birmingham, Alabama, Case No. 2: 20-cv-00619-AKK)
- Expert witness in *Florida State Conference of the NAACP v. Lee* (U.S. District Court in the Northern District of Florida, Case No. 4:21-cv-00187-MW-MAF)
- Expert witness in *One Wisconsin Institute Inc. v. Jacobs* (U.S. District Court in the Western District of Wisconsin, Case No. 15-CV-324-JDP).
- Expert witness in *Alpha Phi Alpha Fraternity Inc., et al. v. Raffensperger* (U.S. District Court for the Northern District of Georgia, Case No. 1:21-cv-05337-SCJ)
- Expert witness in *Robinson, et al. v. Ardoin* (U.S. District Court for the Middle District of Louisiana, Civil Action No. 22-cv-00211).
- Expert witness in *Nairne, et al. v. Ardoin* (U.S. District Court for the Middle District of Louisiana, Civil Action No. 3:22-cv-00178 SDD-SDJ).
- Expert witness in *White, et al. v. State Board of Election Commissioners, et al.* (U. S. District Court for the Northern District of Mississippi, Civil Action No. 4:22-cv-00062-SA-JMV).

EXHIBIT 2

*Excerpts of April 21, 2023 Deposition of
Barbara Rice Anders, as Mainland
NAACP Corporate Representative and
in her individual capacity*

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

TERRY PETTEWAY, THE)	
HONORABLE DERRECK ROSE,)	
MICHAEL MONTEZ, SONNY)	
JAMES and PENNY POPE,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
v.)	NO. 3:22-cv-57
)	
GALVESTON COUNTY, TEXAS,)	
and HONORABLE MARK HENRY,)	
in his official capacity)	
as Galveston County Judge,)	
)	
Defendants.)	
)	
_____)	
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CIVIL ACTION
)	
v.)	NO. 3:22-cv-93
)	
GALVESTON COUNTY, TEXAS,)	
GALVESTON COUNTY)	
COMMISSIONERS COURT, and)	
HONORABLE MARK HENRY, in)	
his official capacity as)	
Galveston County Judge,)	
)	
Defendants.)	
)	
_____)	
DICKINSON BAY AREA BRANCH)	
NAACP, GALVESTON BRANCH)	
NAACP, MAINLAND BRANCH)	
NAACP, GALVESTON LULAC)	
COUNCIL 151, EDNA)	
COURVILLE, JOE A. COMPIAN,)	
and LEON PHILLIPS,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
v.)	NO. 3:22-cv-117

Barbara Anders

April 21, 2023

1)
 GALVESTON COUNTY, TEXAS,)
 2 HONORABLE MARK HENRY, in)
 his official capacity as)
 3 Galveston County Judge,)
 and DWIGHT D. SULLIVAN, in)
 4 his official capacity as)
 Galveston County Clerk,)
 5)
 Defendants.)

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ORAL AND VIDEOTAPED DEPOSITION OF
 BARBARA ANDERS
 APPEARING AS CORPORATE REPRESENTATIVE OF
 PLAINTIFF NAACP MAINLAND BRANCH
 APRIL 21, 2023

ORAL AND VIDEOTAPED DEPOSITION OF BARBARA ANDERS,
 produced as a witness at the instance of the DEFENDANTS,
 and duly sworn, was taken in the above-styled and
 numbered cause on the 21st of April, 2023, from 9:10
 a.m. to 6:16 p.m., before Velma C. LaChausse, Shorthand
 Reporter and Notary Public in and for the State of
 Texas, reported by machine shorthand, at the law offices
 of Greer Herz & Adams, L.L.P., 2525 South Shore
 Boulevard, Suite 203, League City, Texas 77573, pursuant
 to the Federal Rules of Civil Procedure and the
 provisions stated on the record or attached hereto.

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A P P E A R A N C E S

FOR THE NAACP MAINLAND BRANCH PLAINTIFF:
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Skadden Fellow, Voting Rights Program
TEXAS CIVIL RIGHTS PROJECT
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FOR THE DEFENDANTS:
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E-mail: jrusso@greerherz.com

ALSO PRESENT:
Mr. Bill Hartley, Videographer
Ms. Jordan Raschke
Mr. Andrew Silberstein
Mr. Brandon Guerrero

1 Q. And who divvies out the care?

2 A. Your providers. When you go to your physician,
3 he decides on what referral you're going to get. He --
4 till today, it's still --

5 Q. Is the provider Galveston Health District?

6 A. The provider is within Galveston County Health
7 District or a provider within any institution, public or
8 private physicians decide -- determine what quality of
9 care you're going to get.

10 Q. Okay. And so are you aware of any Galveston
11 County Health District provider?

12 A. Well, that's -- that's been a long time that I
13 was there, but I'm just saying --

14 Q. Well, let me finish my question.

15 A. Okay.

16 Q. Are you aware of any Galveston County Health
17 District provider that you would maintain discriminated
18 against an individual patient on the basis of their
19 race? Are you aware of any specific instance of that or
20 complaint lodged?

21 A. Well, I'm sure they had a lot of complaints. I
22 didn't get them. But I don't know.

23 Q. Yeah.

24 A. Because you're asking me to tell you something.

25 Q. I'm asking you what you know. That's all I'm

1 asking.

2 A. Yeah, that's what I'm saying. You're asking me
3 on what I know and what I thought about the Health
4 District.

5 Q. So are you aware of any complaints lodged
6 against the Health District for racial discrimination
7 during your time there?

8 A. I'm aware that -- that the people probably
9 didn't think that they had adequate access to care.

10 Q. Are you -- did anyone complain to you about
11 that?

12 A. Did they complain directly to me? Well, I
13 can't tell you exactly. I don't remember exactly who
14 complained, but I would hear complaints from people
15 saying that they didn't feel like they got the adequate
16 referrals and stuff that they needed at that time.

17 Q. And is it -- so is it your conclusion sitting
18 here today that the person that was complaining was
19 being discriminated against based upon their race?

20 A. I think they would be discriminated based on
21 their race because they have limited access to other
22 care options. When you're a group of people in a
23 certain place and they don't have the same care as
24 someone else, then they have limited access to different
25 healthcare environments. They have limited access to

1 people like speech therapists or PT, OT, all that
2 because that comes provider based on what kind of care
3 you're actually going to get.

4 Q. And is that -- is that response based upon the
5 fact that the individual doesn't necessarily have their
6 own coverage for healthcare or is it because the
7 individual's race in your mind? In other words, let me
8 ask you this. In the time that you worked there, were
9 White patients treated the same way that African
10 American patients were treated if they had the same
11 income level and the same access to healthcare, as far
12 as you know?

13 A. As far as I know, they might have more access
14 because they're going to get different referrals.

15 Q. And are you aware of that happening where a
16 White patient and a Black patient with the same access
17 to healthcare or same limitations to healthcare, where
18 the White patient received a more beneficial referral?

19 A. It's within the healthcare systems? Of course.

20 Q. You're aware of that specific instance?

21 A. Well, we -- specific? Okay. I'm going to just
22 say with -- I come from the Health Department to where
23 you were grouped into one specific place that you can go
24 till they -- the federal government had to -- because of
25 all the litigations they had between unequal access to

1 the statistical information. I'm okay with that.

2 A. Okay.

3 Q. What I don't want to happen is, again, we get
4 to trial and all of a sudden Mainland's view is, oh,
5 yeah, 75 to 70 percent based upon what I'm reading. You
6 understand what I'm saying?

7 A. I said that the Black and Latino people vote --
8 generally vote together to elect candidates of their
9 choice.

10 Q. Mm-hmm. And the reason you say that is because
11 you used an example, Commissioner Holmes had been
12 elected in old Precinct 3 year after year. Is that
13 true?

14 MS. CHEN: Objection; form.

15 A. Well, that's just one thing. It's not all the
16 time, but I'm saying they usually vote to try to get the
17 candidates of their choice in their area.

18 Q. (BY MR. RUSSO) What else? Is there anything
19 else that makes you believe that -- that -- if you
20 believe this, that African American voters and Hispanic
21 voters are cohesive? What other evidence do you have to
22 support that?

23 A. Because in this area they have some of the same
24 things regarding as to economics. They have some of the
25 same houses [sic] as the -- issues as economic housing,

1 education and stuff. So they have some of the same
2 things. They have the same thing as when you come to
3 economic development, workforce development. It's the
4 same thing. So you're trying to help the marginal
5 people to do better. So, yeah, they have some of the
6 same basic ideas and needs.

7 Q. All right. Let's see what else we can look at.

8 On Page 914 --

9 A. Okay.

10 Q. -- the heading on 914 says, "Traditional
11 Redistricting Criteria."

12 A. Mm-hmm.

13 Q. Can you tell me, on behalf of Mainland, which,
14 if any, of these criteria that Galveston County
15 Commissioners Court failed to use -- allegedly failed to
16 use in the passing of adopting the map in November of
17 2021?

18 MS. CHEN: Objection; form. Calls for a
19 legal conclusion.

20 A. So are you -- so are you saying that -- what
21 are you asking on this? Like, they're -- they --
22 preserving communities of interest? They changed those
23 communities of interest because they split the
24 communities, and so you have different -- when you split
25 the communities and stuff, you -- you change -- you

EXHIBIT 3

*Excerpts of January 10, 2023 Deposition
of Commissioner Robin Armstrong*

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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.)
GALVESTON COUNTY, et al.,)
Defendants)

Case No. 3:22-CV-00057

ORAL AND VIDEO DEPOSITION OF

DR. ROBIN ARMSTRONG

January 10, 2023

ORAL AND VIDEO DEPOSITION OF DR. ROBIN ARMSTRONG,
produced as a witness at the instance of the Plaintiffs,
and duly sworn, was taken in the above-styled and
numbered cause on the January 10, 2023, from 9:07 a.m.
to 3:59 p.m., before Bonnie L. Rodriguez, CSR in and for
the State of Texas, reported by machine shorthand, at
Greer, Herz & Adams, L.L.P., One Moody Plaza, 18th
Floor, Galveston, Texas 77550 pursuant to the Federal
Rules of Civil Procedure.

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A P P E A R A N C E S

FOR THE PLAINTIFF, PETTEWAY:

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ALSO PRESENT:

MR. DAMON NORRIS, Videographer

1 R E M O T E A P P E A R A N C E S

2 FOR THE PLAINTIFF, PETTEWAY:

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R E M O T E A P P E A R A N C E S

FOR THE PLAINTIFF, UNITED STATES DEPARTMENT OF JUSTICE:
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jraschke@greerherz.com

ALSO PRESENT:

ADRIANNE SPOTO
SARAH CHEN
JOAQUIN GONZALEZ
ZACHARY NEWKIRK
HILARY KLEIN
MATEO FORERO

1 Q Now, you talked about how the Senate District
2 11 does span multiple counties and different areas.

3 A Correct.

4 Q Are there any areas in particular that you
5 feel your values are particularly in line with?

6 A I think just with -- in the district as a
7 whole. I mean, it's kind of -- you know, I think that
8 certainly I was -- yeah, I think in the district as a
9 whole.

10 Q Okay.

11 A I know there was -- you know, one thing that
12 was -- that was -- would be different about me is there
13 were certainly a lot of African American who know me who
14 were very excited about me running as well, even on
15 Republican side of the aisle.

16 So that was kind of a unique thing that I
17 thought would certainly be helpful in the general
18 election.

19 Q Did you receive any endorsements from African
20 American community leaders for that race?

21 A No.

22 Q Did you seek any endorsement from African
23 American community leaders?

24 A I did not in that race. I did have some
25 support but it -- it -- it's -- it's difficult --

1 it's -- it would put them in a bad spot to have them
2 endorsing in a Republican primary, Number 1. You know,
3 that would put them in a bad spot they don't want to be
4 in.

5 It would actually put just -- and then it
6 wouldn't be necessarily helpful in the Republican
7 primary either to have their endorsement. So I think
8 there was -- there was some talk, actually, from some
9 local leaders, you know, of trying to maybe get African
10 Americans to vote in the Republican primary, you know,
11 but I thought that that would -- you know, I thought
12 that that would be unfair, you know, if -- I think -- I
13 didn't think that that would be fair to ask them to do
14 that. So I did not proceed down that.

15 But I did have some meetings with
16 prominent African American leaders who were wanting to
17 help in some way.

18 Q Okay. Let's break that down.

19 A And that was not a -- that was -- you know,
20 that was not precipitated by me at all. That was
21 actually brought forth by -- by -- by them.

22 Q Why did you think that it would be unfair to
23 ask African Americans to vote in the Republican
24 primary?

25 A Well, 'cause it would probably put them in

1 a -- you know, because I think, generally, those guys
2 are involved in the Democrat primary and they're --
3 they're involved with Democrat party politics generally.
4 Not all of them but certainly generally they are.

5 So I just felt like that was -- you know,
6 I appreciated their making that gesture but -- but. . .

7 Q And when you say generally those guys are
8 involved in Democratic party and Democratic party
9 politics, those guys, are you referring to
10 the African --

11 A African American.

12 Q -- American community leaders?

13 A Leadership, yeah.

14 Q Okay.

15 A Yeah. Well, my dad was one of them. You
16 know, my dad was involved with them.

17 Q And so you said that it might put them in a
18 bad spot to endorse in the Republican primary. What did
19 you mean by that?

20 A Well, it would be uncomfortable. It'd be
21 uncomfortable for them.

22 Q And why is that?

23 A Well, because they're Democrats getting
24 involved in the Republican primary 'cause we have an
25 open primary in Texas. So they could do that if they

1 A Based on the -- the leadership and who they
2 endorse typically.

3 Q And when you say "the leadership," are you
4 referring to the national NAACP or Texas branch or a
5 local branch? What do you mean by that?

6 A I would say the leadership in all of the
7 above.

8 Q Okay. Did you seek an endorsement from
9 LULAC?

10 A No.

11 Q Why not?

12 A Because they would not give it. For the same
13 reasons. Same reasons. I mean, they -- they tend to
14 participate more in the Democratic process -- Democrat
15 party process.

16 Q And why do you believe that is?

17 A I believe the leadership is engaged there for
18 the same reasons as the NAACP leaderships engages in the
19 Democrat party. I think there are lots of opportunities
20 for the leadership of those organizations in the
21 Democrat party.

22 Q And what do you mean by that?

23 A Opportunities for leadership -- for those
24 leadership positions. Opportunities to grow in -- in --
25 in -- or to be more involved with the Democrat party at

1 higher and higher levels if you're involved with those
2 organizations.

3 Q And are there less of those opportunities for
4 members of those organizations in the Republican party?

5 A For the NAACP leadership and for the LULAC
6 leadership, there are probably no opportunities to -- to
7 rise to leadership in the Republican party.

8 Q And why is that?

9 A Because of those organization stance on many
10 issues.

11 Q Which issues come to mind for you right now?

12 A Pro-life is one.

13 Q Any others?

14 A Pro-family issues.

15 Q And what are those?

16 A Like marriage being defined as one man and one
17 woman. Those are two big issues that come to mind.

18 Q Anything else?

19 A I think those cultural issues are the two main
20 ones.

21 Q Did you seek an endorsement from any other
22 minority community groups?

23 A Minority community groups, no.

24 Q Did you receive any endorsement from community
25 groups?

1 ambiguous.

2 A A person of integrity, conservative values as
3 I outlined earlier. Those are the main things.

4 Q (BY MS. LEEPER) Do you support candidates
5 merely because their race is the same as yours?

6 A No.

7 Q Do you feel represented by an elected official
8 just because their race is the same as yours?

9 A No.

10 Q Do you believe that you automatically
11 represent your African American constituents just
12 because you yourself are African American?

13 A No.

14 Q Switching gears a little bit. You were acting
15 as a medical professional during the height of the
16 COVID-19 pandemic, correct?

17 A Yes.

18 Q In your experience, how did COVID-19 impact
19 the African American community?

20 A It affected the African American community
21 more because of risk factors such as diabetes and
22 obesity and low Vitamin D levels. So we had a -- more
23 of an impact in the African American community.

24 Q And when you say more of an impact in the
25 African American community, are you saying compared to

1 the white community?

2 A Compared to any community.

3 Q Okay.

4 A Also, it affected Latinos as well.

5 Q And when you say it affected Latinos as well,

6 are you saying it affected Latinos more than the

7 white --

8 A More so.

9 Q -- community?

10 A Generally, yes.

11 Q Okay. You also were speaking about your

12 previous experience working in Galveston County and

13 doing health screenings and things of that nature.

14 A Uh-huh.

15 Q Are there any other health issues aside from

16 COVID-19 that you, in your experience, have seen impact

17 the African American community disproportionately?

18 A Hypertension, diabetes, obesity.

19 Q How about the Latino community?

20 A Diabetes, probably obesity as well.

21 Q Have you observed any differences in access to

22 health care for the minority community?

23 A Have I experienced it?

24 Q Observed it.

25 A Observed it?

1 Q Yes.

2 A Okay. I have observed it.

3 Q How so?

4 A I think that -- I think that the access is --
5 is there. I think certainly if you lack, you know,
6 health insurance coverage, you know, you may not have,
7 you know, the -- sort of the level of care that you
8 might want. I shouldn't say the level of care 'cause
9 the level of care is there.

10 In my practice, we provide care for
11 everyone irrespective of the insurance status but I
12 think that, you know, maybe there's not as many clinics.
13 There are -- there are health clinics that are there but
14 I think certainly lack of insurance is a problem for
15 everybody.

16 Q And have you observed that lack of insurance
17 is a problem that impacts minorities at a greater
18 rate?

19 A Generally.

20 Q You mentioned earlier that you had supported
21 Lonnie Cox; is that correct?

22 A Yes.

23 Q And could you remind me what race that was
24 in?

25 A He's a district court judge.

EXHIBIT 4

*Excerpts of March 31, 2023 Deposition
of Joe Compian, as LULAC Council 151
Corporate Representative and in his
individual capacity*

1)
 GALVESTON COUNTY, TEXAS,)
 2 HONORABLE MARK HENRY, in)
 his official capacity as)
 3 Galveston County Judge,)
 and DWIGHT D. SULLIVAN, in)
 4 his official capacity as)
 Galveston County Clerk,)
 5)
 Defendants.)

6 -----

7 ORAL AND VIDEOTAPED DEPOSITION OF

8 JOE COMPIAN

9 APPEARING IN HIS INDIVIDUAL CAPACITY

10 AND AS CORPORATE REPRESENTATIVE OF

11 PLAINTIFF GALVESTON LULAC COUNCIL 151

12 MARCH 31, 2023

13 -----

14 ORAL AND VIDEOTAPED DEPOSITION OF JOE COMPIAN,

15 produced as a witness at the instance of the DEFENDANTS,

16 and duly sworn, was taken in the above-styled and

17 numbered cause on the 31st of March, 2023, from 9:08

18 a.m. to 6:21 p.m., before Velma C. LaChausse, Shorthand

19 Reporter and Notary Public in and for the State of

20 Texas, reported by machine shorthand, at the law offices

21 of Greer Herz & Adams, L.L.P., One Moody Avenue,

22 Galveston, TX 77550, pursuant to the Federal Rules of

23 Civil Procedure and the provisions stated on the record

24 or attached hereto.
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A P P E A R A N C E S

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Phone: (409)797-3200
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ALSO PRESENT:
Mr. Bill Hartley, Videographer
Ms. Alexandra Copper
Ms. Angie Olalde
Mr. Bruce B. Gear
Ms. Joaquin Gonzalez
Ms. Kathryn Garrett
Mr. Mateo Forero
Ms. Simone Leeper

1 the board. I don't know.

2 Q. Okay. Do they raise money for the school?

3 A. For the schools.

4 Q. All right. Got that one. Okay.

5 A. Which is now La Marque as well. Right?

6 Q. Right.

7 A. That's where La Marque was consolidated.

8 Q. Okay.

9 A. I'm on the Catholic Charities advisory board
10 for Galveston County as well as the main Harris County
11 group.

12 Q. Okay.

13 A. I am a member of the Knights of Columbus in --
14 at the Queen of Peace Church. That's Knights Council --
15 I can't think of it right now, but I always call it the
16 Queen of Peace -- in La Marque.

17 Q. Okay.

18 A. Group. A member of LULAC, a member of NAACP,
19 the --

20 Q. Which branch?

21 A. It's the at large. I joined at large.

22 Q. Okay.

23 A. Keep going here. Let me stop and think. I
24 have to think of these.

25 I'm a senior fellow with the American

1 Leadership Forum. I'm a community leadership volunteer,
2 external relations governmental OPS supervisor for the
3 American Red Cross, and, slash, I also am a disaster
4 action team supervisor which we respond to fires and
5 natural weather events on properties.

6 Q. Disasters?

7 A. Disasters, yeah. Disasters.

8 Q. Is that Red Cross also?

9 A. Yes, sir.

10 Q. Okay.

11 A. Yeah. Most people don't realize that we
12 respond to more fires than we do disasters actually.
13 And between Wednesday -- I'm bragging about this --
14 there's only two of us here in Galveston County --
15 between Wednesday of last week as of last night, when I
16 was finishing this intake, we, between the both of us,
17 provided service to 16 families that were impacted by
18 home fire.

19 Q. That's great.

20 A. And let me see. Let me go on. LULAC. I'm a
21 parish social minister with the Archdiocese of
22 Galveston-Houston.

23 Q. Okay. You said parish social?

24 A. Yes, sir, parish social minister.

25 Q. Does that mean that -- what does that --

1 We all share that ownership. And I guess that's what it
2 fundamentally comes down to. We no longer feel, "we,"
3 "LULAC," "myself," that I feel I have any ownership.

4 We're just as Precinct 3 as it existed
5 previously we had starting with Wayne Johnson, who was
6 my classmate at La Marque High School, we had this
7 opportunity to build leadership and Wayne was a dynamic.
8 You never met him. God bless him, too.

9 But Wayne was dynamic. He convinced a
10 young Mexican kid to also think beyond his abilities.
11 "Joe, you're going to become the next student body
12 president here, and what you're going to do is go out
13 there and become the" -- he had a plan. He was -- I
14 learned a lot. It was a plan.

15 And no one -- no one had really engaged me
16 in that -- in that fashion.

17 Q. Mm-hmm.

18 A. So it was building leadership and then that
19 continued on. Right? With Stephen Holmes and then
20 others stepping forth, other members as constables and
21 JPs. Right? And other city commission positions in
22 Texas City and La Marque, both in the African American
23 and Latino community. It was building -- building
24 leadership, where none existed, within those
25 communities.

1 And what we have today here, which I
2 struggle with, is we have a map that has me with a
3 community that doesn't even look like me, that doesn't
4 even have my same income, that we have different values.
5 If we're going to talk about building affordable housing
6 for seniors, it -- I probably won't get a buy-in from
7 those commissioners that represent because of that
8 NIMBYism. Right? Not in my neighborhood.

9 So those -- and we've seen that
10 historically. We've seen it. But we were -- in
11 La Marque we built using tax credits three -- two senior
12 housing, affordable housing developments, and one mixed
13 income development over there.

14 There's been no further efforts of that.
15 Dickinson tried to do that. Suddenly that was not
16 successful on that side. So it's a different dynamic
17 under this -- the existing map.

18 Q. So it sounds likes -- and with your mention of
19 Judge Henry, you put -- do you put more -- sort of
20 ascribe more blame to Mark Henry than the other
21 commissioners involved?

22 MS. VALL-LLOBERA: Objection; misstates
23 prior testimony.

24 A. I'm not privy to -- I don't know. I don't
25 know. Simple, I don't know. I don't know the dynamics

1 A. No. That's all.

2 Q. All right. There's also the allegation in the
3 same sentence -- I'm sorry -- the next sentence,
4 specifically there's a geographically compact population
5 of Black and Latino voters. Do you see that?

6 A. I do, yes.

7 Q. Do you know what the phrase "geographically
8 compact population" is referring to?

9 A. I believe so.

10 Q. Okay. What's your understanding of that?

11 A. We have an area of community where there is a
12 significant presence of members of communities of color.

13 Q. Is that it?

14 A. Yes, sir.

15 Q. All right. And then the sentence goes on to
16 say "who constitute a majority of single-member
17 commissioner -- a single-member commissioner precinct.
18 These voters are politically cohesive." Do you see that
19 phrase?

20 A. I do.

21 Q. Do you know what's meant by politically
22 cohesive?

23 A. Once again, they vote based upon issues.
24 Present me a candidate that has issues that I agree with
25 and we have a shared interest in certain areas, the

1 Black and Brown voters, Latino voters.

2 Q. Do you have sort of an -- what's your
3 understanding of what it takes to have a politically
4 cohesive set of voters?

5 A. Once again, a shared interest in issues. We --
6 we'll have a community that desires to build -- well,
7 I'll go back even further.

8 We have a community with a long history
9 where our infrastructure in our community is causing us
10 to lose 60 percent of our water -- of our water. That
11 community doesn't have the wherewithal financially to
12 repair that infrastructure. If we have to compete
13 against other wealthier parts of the county with a
14 higher number of voters that are other than Brown and
15 Black that live in this geographic area, then our
16 concerns are ignored. We can't get any support to
17 repair the infrastructure.

18 Q. Okay. Is that -- I mean, your testimony is
19 that somehow relates to politically cohesive voting?

20 A. Yes. It's do we invest -- how we are going to
21 invest in improving the safety of our water or the
22 breaks -- the sewer breaks and where sewer is flowing
23 into the -- into the ditches.

24 Q. Okay. So I'm trying to sum up here. Is it
25 your testimony that politically cohesive voting deals

1 with how you deal, in this particular instance, with
2 sewer problems?

3 A. It could be -- once again, there's a -- it
4 could be that. It could be affordable housing. It's
5 just a distinction between what we in a Black and Brown
6 community think is important, such as this -- such as
7 trying to elect people that look like us and --

8 Which, by the way, does not make it -- I
9 don't know if you're assuming, Mr. Russo, or something
10 that by electing people that look like us that we are
11 less qualified in some fashion. I hope we're not saying
12 that, are we?

13 Q. I'm not sure what you're saying. I'm just
14 asking questions.

15 A. Okay. All right. I just -- the thought just
16 occurred to me somehow that somehow the fact that Black
17 and Brown seek to vote and support a person who also
18 happens to be Black and Brown on these issues that --
19 you know, as opposed to talking about -- I don't know --
20 what do they -- what are they talking about in the north
21 county? The library, how many library books to pull out
22 of -- to pull out of the League City Library, which we
23 share now a district.

24 Q. Did that relate to the League City Library
25 somehow?

1 A. And they're -- they're articulating and
2 advocating for issues that -- the color is not the
3 primary concern. Right? I go back. I've said it over
4 and over. It's the issues. Can we get behind someone
5 with these issues? It's great if they happen to be
6 Latino, African American member of communities of color
7 in what we've built here locally.

8 Q. And do you believe voters generally vote for
9 the issues in Galveston County or they overly worried
10 about race here?

11 A. Some -- there's some that are overly worried
12 about race.

13 Q. In your estimation, is that the majority of
14 people in Galveston County --

15 A. Oh, I don't know.

16 Q. Or what do you think?

17 MS. VALL-LLOBERA: Objection; speculation.

18 Q. (BY MR. RUSSO) And I'm asking for your
19 estimate.

20 A. Yeah. I don't know, Mr. Russo, except I can
21 tell you this: There was a friend of mine running in
22 the Republican primary who's very competent. Successful
23 businessman. Successful medical doctor, who, as part of
24 his campaigning effort, went knocking on doors and was
25 told on more than one occasion that they would never

1 vote for a Mexican. And he has a Spanish surname.

2 Q. Where was this?

3 A. League City.

4 Q. The election was where?

5 A. It was here in Galveston County. He was

6 running for a position here, a house seat.

7 Q. A Texas House?

8 A. Texas House, yes.

9 Q. The Congress?

10 A. State.

11 Q. State house?

12 A. State house here.

13 Q. And when did this conversation occur?

14 A. The last primary.

15 Q. So in '22?

16 A. 20- -- 20- --

17 Q. In 2022?

18 A. Yeah, '22. Yeah. '22.

19 Q. Do you know this, individual?

20 A. Oh, yeah.

21 Q. Or was this heard secondhand?

22 A. No. Personal friend.

23 Q. Did you hear the conversation personally?

24 A. That -- they conveyed to me, he and his wife.

25 They conveyed that personally to me.

1 Q. Right.

2 A. They -- I wasn't with them knocking on the
3 door.

4 Q. Right. So you didn't actually hear the
5 conversation between voter -- presumed voter or citizen
6 of League City and your friend?

7 A. I'm just telling you what --

8 Q. They conveyed that to you secondhand?

9 A. Yes, sir.

10 Q. Have you ever heard that yourself? An
11 individual say they would never vote for a Latino or a
12 Mexican, in the past ten years?

13 A. Yes.

14 Q. You have?

15 A. Yes.

16 Q. Are you comfortable disclosing the
17 circumstances of that?

18 A. Just in terms of knocking on doors for -- for
19 candidates.

20 Q. Okay. Give me an example of when this
21 happened.

22 A. When there was -- when there was a candidate
23 for a city council race going door to door and we had
24 teams and several of us were told by voters, I'll never
25 vote for that -- well, some word, some other -- some

1 used vulgar language or, I'm sorry, I'll never vote for
2 a Black person. But it's unfortunate. I'm not saying
3 it happened often, but it happened.

4 Q. Would you call it rare?

5 MS. VALL-LLOBERA: Objection;
6 mischaracterizes.

7 A. I don't know -- I'm not saying it happened
8 often. It was during my knocking on doors.

9 Q. (BY MR. RUSSO) I got it. Would you call that
10 experience rare, for you?

11 MS. VALL-LLOBERA: Objection; vague.

12 A. I don't know what your definition of rare is.

13 Q. (BY MR. RUSSO) What's your definition of
14 often?

15 A. If I hear it more than once, it's often. I
16 feel that we should be beyond that.

17 Q. So then you're saying it hasn't happened often,
18 which means it didn't happen more than once?

19 MS. VALL-LLOBERA: Objection;
20 mischaracterizes.

21 A. I didn't say that. I said on more than one
22 occasion.

23 Q. (BY MR. RUSSO) Right. But you said it hasn't
24 happened often. You told me that. You testified to
25 that, it hasn't happened often.

1 Q. Okay. And then that's in your view an example
2 of discrimination against who?

3 A. Against -- against -- first of all, to stop a
4 Brown person, it was just -- just people -- there was
5 this -- this anti-immigrant, anti- -- I would call it
6 anti-immigrant attitude that if you were Brown, you're
7 considered undocumented. You know, I will tell you
8 after -- after one of the elections --

9 Q. Wait, wait, wait. Let me stop you there.

10 A. Okay.

11 Q. Are you suggesting that there is a policy in
12 place with the Galveston County to stop and pull over
13 individuals that looked -- I don't know -- Brown or?

14 A. Oh, yeah.

15 Q. Latino?

16 A. (Nodding head.)

17 Q. Just because they look Brown or Latino?

18 MS. VALL-LLOBERA: Objection; misstates
19 prior testimony.

20 Q. (BY MR. RUSSO) You can answer.

21 A. Yeah. We believe so, yes.

22 Q. You believe so?

23 A. We thought so. We said you shouldn't do this.

24 Q. But despite -- but you believe there is a
25 policy implemented just like that?

1 A. Yeah. It was part of this anti-immigrant
2 rhetoric at the time.

3 Q. And specifically it was stop and detain
4 individuals who looked Latino?

5 A. (Nodding head.)

6 Q. Yes?

7 A. Looked Brown, yes.

8 Q. Okay. Is there anything else that you can
9 think of that constitutes what you believe is official
10 discrimination in Galveston County?

11 A. Well, those instances come to my mind, the
12 immigration holds and those things. Give me time. I'll
13 probably think of something else.

14 Q. Time we have, I guess.

15 A. Yes, sir.

16 Q. Has -- is LULAC, as an organization, aware or
17 have they done studies of the socioeconomic condition of
18 Galveston County residents, the disparities between
19 different groups in Galveston County?

20 MS. VALL-LLOBERA: Objection; compound and
21 vague.

22 A. Socioeconomic differences? No.

23 Q. (BY MR. RUSSO) You're not aware of any?

24 A. I'm not aware of any, no.

25 Q. Have there been any studies -- let me break it

1 down a little bit further -- related to sort of health
2 or educational distinctions between what's provided for
3 Latino citizens and others?

4 MS. VALL-LLOBERA: Objection; vague.

5 A. I -- well, only -- I -- the only thing that
6 comes to my mind right now is that during COVID we were
7 seeing and I received a call, once again, from the
8 health authority that we need to encourage individuals
9 who primarily spoke Spanish to come in and get
10 vaccinated or to -- first of all, to get tested, COVID
11 tested. Right?

12 Q. (BY MR. RUSSO) Right.

13 A. That began -- that was the first, to come in
14 and have that terrible swab up your nose and -- you
15 know, it was terrible.

16 Q. I'm laughing because of my kids' reaction to
17 that. It was hilarious.

18 A. Oh. Oh. I can imagine.

19 Q. Go on. Sorry.

20 A. And -- and that they were seeing -- and you
21 follow the dashboard that the County created for COVID
22 and you could see -- and you go back -- I think they
23 still have the information listed -- the greatest number
24 of COVID-positive cases --

25 Q. Mm-hmm.

1 A. -- were Latino females. And that -- and so the
2 ask was please help us reach out to this community. No
3 one is going to -- no one is going to arrest them.
4 Right? That's what the fear is, that "I'm going to get
5 arrested" or "I'm going to be" -- no. Just come in
6 and -- so...

7 Q. Yeah. In that instance the -- the, I guess,
8 the problem, you're brought in to deal with the language
9 barrier, I guess, that was -- that occurs between the
10 Latino community and those who are trying to provide
11 COVID relief?

12 A. No. It's not just a language barrier. It's
13 the credibility, Mr. Russo. Right? Don't be fearful
14 of -- there may be a policeman, a sheriff's deputy over
15 there, but they're not there to arrest you. Right?
16 "They're going to ask for my papers or this or that."
17 No. It didn't happen.

18 Q. Right.

19 MR. RUSSO: I need that marked.

20 (Exhibit No. 5 was marked.)

21 THE WITNESS: Okay. Thanks. Ah. Here it
22 is, COVID -- Pastor -- Pastor Gomez here. See there?

23 Q. (BY MR. RUSSO) Now, I've provided you a copy
24 of what's been marked as Compian Exhibit 5. It's an
25 article in the Galveston Daily News dated

1 Q. Yeah. Would you expect, though, that, as it
2 would be your testimony, that Latino Americans in
3 Galveston County would vote consistent with the sort of
4 positions that LULAC takes and its position statement?

5 MS. VALL-LLOBERA: Objection; calls for
6 speculation.

7 A. Like I said, I repeat, we let people know these
8 are our issues, and it's almost a report card. Here's
9 where people stand on these issues. You make up your
10 own mind.

11 Q. (BY MR. RUSSO) Is it your belief that African
12 American and Latino voters have the same concerns that
13 should be -- that can be voiced or should be voiced to
14 the Galveston County Commissioners Court?

15 MS. VALL-LLOBERA: Objection; calls for
16 speculation.

17 A. Are you asking me individually or?

18 Q. (BY MR. RUSSO) As LULAC representative.

19 A. LULAC. Yeah. We share -- we've shared -- we
20 share concerns and issues.

21 Q. Are there any -- any -- is there any sense of
22 divergence where the issues part, where the two groups
23 have different concerns?

24 MS. VALL-LLOBERA: Objection; vague.

25 A. I'm not aware of any. I'm not aware of any

1 right now, no.

2 Q. (BY MR. RUSSO) All right. What types of
3 issues faced by both Blacks and Latinos exist which
4 should be -- what you feel should be addressed with the
5 commissioners court?

6 A. Well, we continue to push for collectively in
7 terms of our different collaborations to once again
8 return the -- the qualifying level for the medically
9 indigent program here in the county to 100 percent of
10 the federal poverty level. That's one area. We both
11 collectively push for increased funding for the social
12 services department of Galveston County.

13 We have -- I think this one we've been
14 successful -- I think it's because of the director of
15 the health authority here who's a professor at UTMB --
16 been very successful in asking for additional outreach
17 in different events by the county health authority, and
18 that's been successful.

19 What else? I think all of us, too -- I say
20 all of us, maybe that includes even -- even -- even
21 Anglos, but we appreciate the fact that the County has
22 attempted to -- to toe the line in terms of property tax
23 increases and -- and so those are the ones that come to
24 mind right now.

25 Q. And you're saying that the County has not

1 raised taxes is a good thing?

2 A. Yes. Is a good thing, yes.

3 Q. And that's -- you think the view is consistent

4 amongst the Latino and African American community?

5 MS. VALL-LLOBERA: Objection; calls for

6 speculation.

7 A. I believe we're on the same page on that.

8 Q. (BY MR. RUSSO) What -- what needs that the
9 Latino community has that you believe are different than
10 the Anglo community for purposes of, you know,
11 county/government -- county -- that the county can help
12 with?

13 MS. VALL-LLOBERA: Objection; calls for
14 speculation.

15 A. Well, first and foremost, it comes to mind now
16 that we've kind of eliminated an ability to perhaps
17 impact electing individuals of similar background as
18 ourselves in this new precinct -- but what immediately
19 comes to mind is take a look at all the appointed
20 positions by commissioners court, and you'll see very,
21 very few Latinos on those appointed.

22 There is no Latino on the new United Board
23 of Health, just because we were successful in saying and
24 articulating a position that -- that at least one person
25 would be, does not mean that we can't have more than

1 one. Right?

2 And then there are other appointments by
3 the commissioners court and the county judge to some of
4 the subject committees of the Houston-Galveston Area
5 Council of governments, such as those that deal with
6 senior services and the disabled, that -- that area --
7 those areas have traditionally not been appointments to
8 either Latinos or African Americans.

9 So I think that that's an urgent need, that
10 we would all love to see that dynamic change.

11 Q. (BY MR. RUSSO) And are you aware of any
12 situations where the, you know, elected Galveston County
13 officials have been unresponsive to the needs of
14 Latin -- of Latino Americans in Galveston County?

15 MS. VALL-LLOBERA: To clarify, his
16 individual capacity or LULAC?

17 MR. RUSSO: As LULAC.

18 A. Try to get the -- say, within -- say, from
19 Hurricane Ike or from what point on?

20 Q. (BY MR. RUSSO) 2010 forward.

21 A. 2010. When was Harvey? 2011. Right?

22 Q. '17?

23 A. '17. Harvey was '17? '-8 was -- was Ike.

24 Yeah.

25 There was, I want to say, more with Harvey

1 than -- on some of the -- Harvey was a federally
2 declared disaster, and there was an issue with regard to
3 where was the recovery focus going to occur. And the
4 feds sent down to the council of governments, HGAC, the
5 Harvey disaster mitigation dollars and that -- that --
6 that plan to divvy up those dollars was opposed by both
7 LULAC and, to some extent, NAACP, but Houston's our
8 300-pound gorilla in the area, and so sometimes those
9 lines get a little fuzzy there.

10 But the division plan ultimately did not
11 favor smaller communities like La Marque, like
12 Hitchcock, like Santa Fe. It was -- the majority of the
13 money went to Friendswood, League City, Dickinson.

14 Why? For what reason? They used damage
15 estimates from those areas, and our value -- home values
16 are very different. Average home price in League City,
17 \$350,000. Average home price in La Marque, \$128,000.

18 So La Marque, which has a -- we feel a
19 greater need, greater damage amount, certainly
20 property -- number of properties.

21 Q. Mm-hmm.

22 A. -- we only -- we ended up with a lesser amount
23 of dollars. So that was an issue that we found -- we
24 didn't find any support from the County.

25 Q. So it was a feeling that the County was

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

TERRY PETTEWAY, THE
HONORABLE DERRECK ROSE,
MICHAEL MONTEZ, SONNY
JAMES and PENNY POPE,

Plaintiffs,

v.

GALVESTON COUNTY, TEXAS,
and HONORABLE MARK HENRY,
in his official capacity as Galveston
County Judge,

Defendants.

Civil Action No. 3:22-cv-57

UNITED STATES OF AMERICA,

Plaintiff,

v.

GALVESTON COUNTY, TEXAS,
GALVESTON COUNTY
COMMISSIONERS COURT, and
HONORABLE MARK HENRY, in
his official capacity as Galveston
County Judge,

Defendants.

Civil Action No. 3:22-cv-93

DICKINSON BAY AREA BRANCH
NAACP, GALVESTON BRANCH
NAACP, MAINLAND BRANCH
NAACP, GALVESTON LULAC
COUNCIL 151, EDNA COURVILLE,
JOE A. COMPIAN, and LEON
PHILLIPS,

Civil Action No. 3:22-cv-117

Plaintiffs,

v.

GALVESTON COUNTY, TEXAS,
HONORABLE MARK HENRY, in
his official capacity as Galveston
County Judge, and DWIGHT D.
SULLIVAN, in his official capacity as
Galveston County Clerk

Defendants.

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CERTIFICATE OF DEPONENT

May 19, 2023

Joe Compián
March 31, 2023

1 CHANGES AND SIGNATURE

2 WITNESS NAME: JOE COMPIAN

3 DATE OF DEPOSITION: MARCH 31, 2023

4 PAGE LINE CHANGE REASON

5 Please see attached Errata sheet.

6 _____

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Joe Compián
March 31, 2023

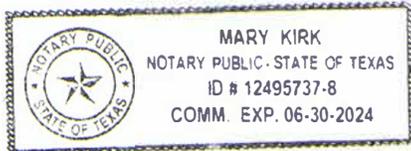
1 I, JOE COMPIAN, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.

4
5 
6 JOE COMPIAN

7 THE STATE OF Texas
8 COUNTY OF Cherokee

9
10 Before me, MAY 19, 2023, on
11 this day personally appeared JOE COMPIAN, known to me
12 (or proved to me under oath or through
13 TXDL) (description of identity
14 card or other document) to be the person whose name is
15 subscribed to the foregoing instrument and acknowledged
16 to me that they executed the same for the purposes and
17 consideration therein expressed.

18 Given under my hand and seal of office this
19 19 day of May, 2023.



20
21 
22 NOTARY PUBLIC IN AND FOR
23 THE STATE OF Texas
24 COMMISSION EXPIRES: 06/30/2024
25

DEPOSITION ERRATA SHEET FOR JOE COMPIAN/LULAC (MARCH 31, 2023)

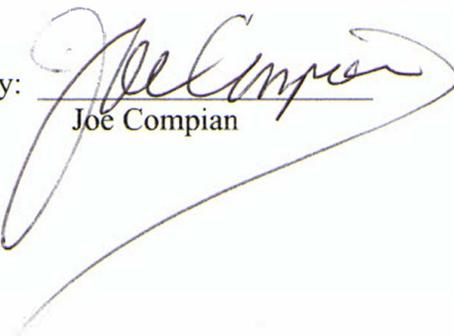
Page	Line	Change	Reason
6	14	“NAACP, Plaintiffs” to “NAACP Plaintiffs”	Typographic Error
30	8	“that was the bases for the” to “that was the basis for the”	Typographic Error
33	8	“across th” to “across the”	Typographic Error
61	19	“That’s a emergency” to “That’s an emergency”	Typographic Error
61	21	“ham -- ham license” to “REACT – drone” license	Transcription Error
67	20	“Isn’t still Judge Ewing” to “Isn’t it still Judge Ewing”	Typographic Error
68	4	“Kenyas” to “Quintanillas”	Transcription Error
68	7	“Kenyas” to “Quintanillas”	Transcription Error
82	7	“stupido” to “estupido”	Typographic Error
84	7	“marking” to “marketing”	Typographic Error
89	1	“commissioners court” to “Commissioners Court”	Typographic Error
94	9	“Apfell” to “Apffel”	Typographic Error
95	14	“counsel” to “council”	Typographic Error
97	3	“commissioners court” to “Commissioners Court”	Typographic Error
105	15	“commissioners court” to “Commissioners Court”	Typographic Error
107	15	“commissioners court” to “Commissioners Court”	Typographic Error
109	12	“They are” to “there are”	Typographic Error
113	22	“commissioners court” to “Commissioners Court”	Typographic Error
117	15	“commissioners court” to “Commissioners Court”	Typographic Error
118	6	“department of justice” to “Department of Justice”	Typographic Error
124	16	“Freddiesville area” to “Friendsville area”	Typographic Error
133	17	“And there had to fill in for” to “And they had to fill in for”	Typographic Error
133	24	“commissioner Apffel” to “Commissioner Apffel”	Typographic Error
149	18	“commissioners court” to “Commissioners Court”	Typographic Error
154	12	“commissioners court” to “Commissioners Court”	Typographic Error

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214	5	"commissioners court" to "Commissioners Court"	Typographic Error
215	20	"commissioners court" to "Commissioners Court"	Typographic Error
216	3	"commissioners court" to "Commissioners Court"	Typographic Error
219	6	"statute" to "statue"	Typographic Error
219	17	"statute" to "statue"	Typographic Error
234	23-24	"in which precinct it, although" to "in which precinct it is, although"	Typographic Error
237	16	"An" to "And"	Typographic Error
244	21	"moment to rad" to "moment to read"	Typographic Error
253	16	"All righty." To "All right."	To clarify record
256	1	"NALEO" to "NALEAO"	Typographic Error
256	5	"get COVID" to "got COVID"	Typographic Error
256	11	"NALEO" to "NALEAO"	Typographic Error
257	18	"NALEO" to "NALEAO"	Typographic Error
263	4	"also a very" to "also very"	

Subject to the above changes, on behalf of myself as an individual and a representative of LULAC 151, I certify that my deposition transcript is true and accurate.

By:



Joe Compian

Dated:

MAY 17, 2023

EXHIBIT 5

*Excerpts of March 28, 2023 Deposition of Galveston
NAACP Corporate Representative Patricia Toliver*

Patricia Toliver

March 28, 2023

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

TERRY PETTEWAY, THE HONORABLE)
 DERRECK ROSE, MICHAEL MONTEZ,)
 SONNY JAMES and PENNY POPE,)
)
 Plaintiffs,) Civil Action
) No. 3:22-CV-57
 vs.)
)
 GALVESTON COUNTY, TEXAS, and)
 HONORABLE MARK HENRY, in his)
 official capacity as Galveston)
 County Judge,)
)
 Defendants.)

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
) Civil Action
 vs.) No. 3:22-CV-93
)
 GALVESTON COUNTY, TEXAS,)
 GALVESTON COUNTY)
 COMMISSIONERS COURT, and)
 HONORABLE MARK HENRY, in his)
 official capacity as Galveston)
 County Judge,)
)
 Defendants.)

DICKINSON BAY AREA BRANCH)
 NAACP, GALVESTON BRANCH)
 NAACP, MAINLAND BRANCH)
 NAACP, GALVESTON LULAC)
 COUNCIL 151, EDNA COURVILLE,)
 JOE A. COMPIAN, and LEON)
 PHILLIPS,) Civil Action

Patricia Toliver

March 28, 2023

1) No. 3:22-CV-117
)
 2 Plaintiffs,)
)
 3 vs.)
)
 4 GALVESTON COUNTY, TEXAS,)
 HONORABLE MARK HENRY, in his)
 5 official capacity as Galveston)
 County Judge, and DWIGHT D.)
 6 SULLIVAN, in his official)
 capacity as Galveston County)
 7 Clerk,)
)
 8 Defendants.)

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ORAL/VIDEOTAPED DEPOSITION OF
 PATRICIA TOLIVER
 MARCH 28, 2023

ORAL/VIDEOTAPED DEPOSITION OF PATRICIA
 TOLIVER, produced as a witness at the instance of the
 Defendants, and duly sworn, was taken in the
 above-styled and numbered cause on March 28, 2023, from
 10:00 a.m. to 4:40 p.m., Nilda Codina, Notary in and
 for the State of Texas, recorded by machine shorthand,
 from Greer Herz & Adams, L.L.P. 1 Moody Avenue,
 Galveston, Texas, 77550, County of Galveston, pursuant
 to the Federal Rules of Civil Procedure, and the
 provisions stated on the record or attached hereto.

March 28, 2023

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A-P-P-E-A-R-A-N-C-E-S

FOR THE PLAINTIFF:

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ALSO PRESENT: Bill Hartley, Videographer
REMOTELY: NAACP, Angie Olalde, Adrienne Spoto,
K'Shaani Smith, Joaquin Gonzalez, Mateo Forero, Sarah
Chen, Andrew Silberstein.

1 But this meeting was in League City. It was a smaller
2 courtroom and everything.

3 Q. Okay. On the times that -- other times that
4 you've been -- well, let me -- let me just ask this
5 question to cover this for a second. Did you attend
6 that meeting on November 12th of '21?

7 A. Yes, I did.

8 Q. Okay. So let's put that meeting for -- aside
9 for a minute. You mentioned you went to other meetings
10 at the -- the Commissioners Court. Can you tell me
11 what those meetings were?

12 A. Well, they were -- I'm -- I'm -- I'm sorry.
13 excuse me. I'm also a part with Gulf Coast Interface.
14 I worked with Gulf Coast Interface, NAACP, and also a
15 task force.

16 So as a group we all got together, LULAC.
17 And we went to Commissioners Court in 2012, when --
18 about the redistricting of the maps, when it occurred
19 before. And we went to some other meetings at the
20 Commissioner's Courts, as well.

21 Q. Okay.

22 A. Concerning housing. I'm -- I'm on the
23 housing committee. Also, I'm a commissioner for the
24 housing for DHA.

25 Q. Right. And we'll cover most of that as we go

1 A. Yes. And as an NAACP, we work well with
2 LULAC. And we also have Anglo Americans in our
3 organization, you know. And we all work together.

4 Q. Yeah. So -- and then you -- you -- we talked
5 about the committees. And -- and -- and we talked
6 about improvement. Would you say that you've seen
7 improvement in -- in these areas, most of these areas,
8 including education, housing, health, economics, and
9 criminal justice? Do you see improvements?

10 A. I see improvement, but I see a lot still
11 needs to be done. For example, I'm a breast cancer
12 survivor.

13 Q. Uh-huh.

14 A. And when I would go to national conventions,
15 and they talk a lot about disparages among Blacks, I
16 really didn't see a lot in the medical field because I
17 worked with plastic neurosurgery and my physicians and
18 the nurses I worked with, they were not -- I don't
19 think they were prejudiced at all. But when I went for
20 my health care my doctor did not want to touch my
21 breast.

22 Q. Uh-huh.

23 A. My oncologist, and I could feel -- I knew
24 that wasn't right because I worked in the medical
25 field. But it really made me feel bad --

March 28, 2023

1 Q. Uh-huh.

2 A. -- that he felt like he didn't want to touch
3 me because I was Black. And that's -- that's the way I
4 felt.

5 (Witness crying.)

6 Q. (BY MR. RUSSO:) Yeah.

7 A. And it made me understand better, why --
8 thank you, I'm sorry -- why Black people don't get the
9 care that they need, why they always diagnosing the
10 last stages --

11 Q. Uh-huh.

12 A. -- instead of the early stages, where they
13 can get treatment. Because if you're diagnosed in the
14 last stages, then it's almost too late for you. But if
15 your doctors don't want to give you a proper
16 examination because of the color of your skin you don't
17 really want to go back --

18 Q. Right.

19 A. -- to the physician, you know. And I talked
20 to my nephew. And my nephew was the director of
21 nursing with the oncology department. And he spoke
22 with the doctor about the way he treated me and it got
23 better for a while, but then it -- he -- he started --
24 I mean, I would go there. My insurance is paying 4 or
25 \$500 for a visit. And he's only talking to me,

1 something we can do over the phone.

2 And now I have to say, "Will you please

3 examine me? I don't want to have cancer and don't know

4 that it's reoccurring in my body," you know.

5 Q. Right.

6 A. So it -- it -- it gave me a clearer

7 understanding of what the word "disparages" really

8 meant.

9 Q. Did the -- is the -- was the oncologist a --
10 a UTMB physician?

11 A. Yes.

12 Q. Was he on the island or off the island? I
13 assume it's a he.

14 A. He was on the island. I don't know if he
15 lived on the island, but I saw them here. MD Anderson,
16 at the -- the cancer center. They have the same
17 doctors, some of the same doctors, that work at UTMB
18 that work for MD Anderson, also.

19 Q. Uh-huh. So -- and just by your -- I -- I --
20 I shouldn't assume this. What -- the -- the doctor
21 you're referring to, was he White?

22 A. No.

23 Q. What -- what ethnicity or race was he?

24 A. I'm not sure exactly what he was. I think he
25 was Indian. I'm not sure, but he was -- he's -- he was

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1 the mission statement. But basically the mission
2 statement is that we're going to assure that
3 politically, educationally, housing, civil -- their
4 civil rights -- that everybody have those equal rights.
5 We want equality for all, no discrimination.

6 Q. And what are the -- what are the requirements
7 to join?

8 A. The fee to join is 30 dollars. You fill out
9 a membership application. That's it.

10 Q. And is it an annual fee?

11 A. Yes.

12 Q. All right. And is it -- the organization is
13 open to all races and creeds?

14 A. Most definitely.

15 Q. And genders, of course?

16 A. Most definitely.

17 Q. Okay. And then the Galveston branch,
18 specifically, are there all races and -- and creeds,
19 and genders that are members?

20 A. Yes. We have Anglos and Hispanics. And like
21 I say, we participate with the LULAC. Our president,
22 Mary Patrick, she makes sure that LULAC knows
23 everything that we're doing. And they have a new
24 president. I can't remember his name. But the other
25 president, Lillie Aleman --

1 Q. Uh-huh.

2 A. -- she's on my email list. Anything that I'm
3 involved with, she gets emailed.

4 Q. Okay.

5 A. And Mary Patrick also sends emails with
6 whatever we're involved in.

7 Q. So do you generally find that the membership
8 of the Galveston branch NAACP is -- is different from
9 the membership of LULAC?

10 A. Some -- well, some of -- some organizations.

11 Q. Do you have -- have any clue as to -- to what
12 the -- the number is, or percentage-wise, members in --

13 A. No.

14 Q. -- the Galveston branch and they're also
15 members of LULAC?

16 A. No, I don't.

17 Q. Would you say there are many?

18 A. I would say there's a few.

19 Q. I'll put you to the test here because
20 they're -- would you say it's less than 50 percent?

21 A. Oh, I would say that.

22 Q. What about less than 25 percent?

23 A. I wouldn't say that. I don't know, but my
24 guess is it would be more. I don't -- I really don't
25 know the answer to that question.

1 meeting to eliminate the Black minority vote.

2 They didn't just come out and say that. But
3 the way that they were drawn, like people that was in
4 District 3 were divided into Districts 1, 2, and 4. So
5 therefore Commissioner Holmes would not be able to be
6 elected because it was not enough of Blacks and
7 Hispanics in those areas once those lines were
8 re-drawn.

9 Q. Okay. And is the -- did -- are you a
10 resident of Precinct 3, the old Precinct 3?

11 A. 2. 2. But the only commissioner that I knew
12 was Commissioner Holmes. I, you know, originally
13 thought I was in 3. But no, when I went to vote I
14 wasn't, I was in 2.

15 And -- but Commissioner Holmes is the one who
16 always represented our district. You know, he always
17 include us in everything that he does with his
18 districts and -- and everything.

19 Q. So, yeah, let me follow up with a question.
20 So you were in District 2 prior to the change in 2021,
21 right?

22 A. Correct.

23 Q. And I guess -- I guess you're still in
24 Precinct 2?

25 A. I'm still in 2.

March 28, 2023

1 A. No.

2 Q. Okay. Do you, on -- on behalf of the --
3 let's stick with the branch --

4 A. Okay.

5 Q. -- testimony. Are -- do you believe there's
6 a history of official, sort of governmental,
7 discrimination in Galveston County?

8 A. Yes.

9 Q. And so can -- what examples are you thinking
10 about there?

11 A. It's just that -- you know, like I said
12 earlier, it's just been -- I've -- I've been here for a
13 long time. So it's just been a long line of
14 discrimination. You know, when I think about
15 discrimination I think about segregated schools.

16 Q. Uh-huh.

17 A. Having old text books. When I went to
18 Central we got textbooks that was left over. The
19 students had used them three or four years. So they
20 were not in the best condition.

21 And I think that -- I don't know if the
22 county have anything to do with that or not. I would
23 think that they would. A lot of discrimination -- like
24 you go -- I don't know where you live, but in a lot of
25 the influential neighborhoods the streets are paved.

1 They're good.

2 Our neighborhoods, there's potholes

3 everywhere. And trying to get my house you could ruin

4 a whole car.

5 Q. Uh-huh.

6 A. So I feel like the -- the -- the county could

7 do better with that. The entrance to the McDonald's

8 over there on 53rd, there's so many wrecks there all

9 the time.

10 Q. Let me see.

11 A. 53rd and Broadway.

12 Q. I got you. Yes, yes, yes. I'm with you.

13 A. The congestion. Right now the

14 county's working in front of our church, on 37th.

15 They've had construction there for like the last three

16 or four months.

17 We can't -- people don't even want to come to

18 church because there's nowhere to park. So, yes, I --

19 I don't -- and I could be wrong, but I don't think I

20 am.

21 I don't think they do that in all

22 neighborhoods. Like for one example -- and I'm going

23 to be short. I was at Joe -- not Joe's house. I was

24 at Steve McIntyre's house.

25 And so I say, "Steve, you better tell them

1 they parked on the wrong side of the street, they
2 better move their car," and he said, "Pat, they don't
3 do that here."

4 I was like, "Oh." Because they give us
5 tickets, they tow the car off, you know. So, yes, I
6 think that it's -- it's still a lot that exists, you
7 know. Steve had educated me on a lot of that stuff,
8 you know, Steve was a lawyer. You know Steve?

9 Q. I do.

10 A. He's a very -- very nice guy. But it's just
11 certain things that happen in certain neighborhoods
12 that don't happen in other neighborhoods.

13 Q. And do you attribute that to sort of a
14 discriminatory position? You know, protecting certain
15 neighborhoods versus others?

16 A. Right.

17 Q. Is that kind of where you're headed with
18 that?

19 A. Right. Right. I feel like the -- we -- the
20 county could do better, that the city could do better.
21 We just need to do better.

22 Q. Have you ever expressed those concerns to the
23 city officials?

24 A. No. I expressed it just to my pastor.

25 Q. Okay.

Patricia Toliver
March 28, 2023

1 I, PATRICIA TOLIVER, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.

4 Patricia Toliver

5 PATRICIA TOLIVER

6 STATE OF TEXAS)

7 COUNTY OF Galveston)

8 Before me, Stephen Caldwell Jr. on this day

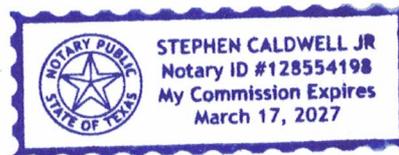
9 personally appeared PATRICIA TOLIVER, known to me (or
10 proved to me under oath through TX Driver License) to be the
11 person whose name is subscribed to the foregoing
12 instrument and acknowledged to me that they executed
13 the same for the purposes and consideration therein
14 expressed.

15 GIVEN UNDER MY HAND AND SEAL OF OFFICE, on this,
16 9th day of May, 2023.

17 Stephen Caldwell Jr.

18 Notary Public, State of Texas

19 My Commission Expires: 03-17-2027



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Patricia Toliver
 March 28, 2023

WITNESS CORRECTIONS AND SIGNATURE

Please indicate changes on this sheet of paper, giving the change, page number, line number and reason for the change. Please sign each page of changes.

PAGE/LINE	CORRECTION	REASON FOR CHANGE
146:1-2	"I don't want nobody but the captain starting up confusion" should be	
	"I don't want nobody but the candidate of the utmost integrity"	
160:15-16	"Proud Fellow" should be "CROWD Fellow"	incorrect name
161:2-5	"Tierisha" should be "Tierrisha"	misspelled name
182:16	"JSD" should be "GISD"	incorrect name
201:17, 19; 202:14	"Nia Culture" should be "Nia Cultural"	incorrect name
209:16-20	"Highland" should be "High Island"	incorrect name
141:12	"form should be "forum"	misheard
165:14,18; 166;3; 170:8	"Hadder" should be "Hatter"	incorrect name
181:15	"over GISD" should be "works at GISD"	misheard
232:4	"Dickinson, Black" should be "Dickinson Bay Area"	misheard

Patricia Toliver

Patricia Toliver
March 28, 2023

1 I, PATRICIA TOLIVER, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.

4 Patricia A. Toliver

5 PATRICIA TOLIVER

6 STATE OF TEXAS)

7 COUNTY OF Galveston)

8 Before me, Stephen Caldwell Jr, on this day

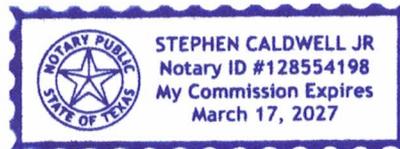
9 personally appeared PATRICIA TOLIVER, known to me (or
10 proved to me under oath through Tx DRIVER license) to be the
11 person whose name is subscribed to the foregoing
12 instrument and acknowledged to me that they executed
13 the same for the purposes and consideration therein
14 expressed.

15 GIVEN UNDER MY HAND AND SEAL OF OFFICE, on this,
16 9th day of May, 2023.

17 Stephen Caldwell Jr.

18 Notary Public, State of Texas

19 My Commission Expires: 03-17-2027



March 28, 2023

WITNESS CORRECTIONS AND SIGNATURE

Please indicate changes on this sheet of paper, giving the change, page number, line number and reason for the change. Please sign each page of changes.

PAGE/LINE	CORRECTION	REASON FOR CHANGE
15:8-9	"Ned Scott" should be "Annette" Scott	incorrect name
16:13, 15; 17:25; 122:19	"Interface" should be "Interfaith"	incorrect name
16:24; 21:8, 13; 22:3	"DHA" should be "GHA"	incorrect name
19:9, 14	"Paris" should be "Pirates"	incorrect name
22:14	"JJ" should be "GHA"	incorrect name
24:3	"Betty Masau" should be "Betty Massey"	incorrect name
24:20	"generational of property" should be "generational poverty"	misheard
30:1	"Holland House" should be "Highland House"	incorrect name
39:21	"Once he" should be "Roxy"	misheard
45:10, 16	"Atascocita" should be "Texas City"	incorrect name
45:21	"there" should be "they're"	typo
46:1	"Dixon" should be "Dickinson"	incorrect name
47:15; 49:7	"disparages" should be "disparities"	misheard
49:15, 51:11	"Ted Wong" should be "Ted Huang"	incorrect name
66:22-23	"National Locus County" should be "National NAACP"	misheard
111:6, 8	"norm" should be "normal"	misheard
111:14	"direct" should be "district"	misheard
116:1	"farms" should be "forums"	misheard
127:4	"Judge Herring" should be "Judge Henry"	incorrect name
130:6	"Mayor Patrick" should be "Mary Patrick"	incorrect name
135:1	"I this" should be "I think" Patricia Toliver	misheard

EXHIBIT 6

*Declaration of Joe Compian, dated June
1, 2023*

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

TERRY PETTEWAY, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Civil Action No. 3:22-cv-57-JVB
	§	[Lead Consolidated Case]
GALVESTON COUNTY, TEXAS, et al.	§	
	§	
<i>Defendants.</i>	§	

UNITED STATES OF AMERICA,	§	
<i>Plaintiff,</i>	§	
	§	
	§	
v.	§	Civil Action No. 3:22-cv-93-JVB
	§	
GALVESTON COUNTY, TEXAS, et al.,	§	
	§	
<i>Defendants.</i>	§	

DICKINSON BAY AREA BRANCH	§	
NAACP, et al.,	§	
,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Civil Action No. 3:22-cv-117- JVB
	§	
GALVESTON COUNTY, TEXAS, et al.	§	
	§	
<i>Defendants.</i>	§	

DECLARATION OF JOE COMPIAN

My name is Joe Compian. I am over the age of 18 and capable of making this

declaration. The facts stated herein are true and within my personal knowledge.

1. I am a resident of La Marque, Texas, and have lived in Galveston County for roughly 60 years.
2. I am a La Marque City Council Member, and currently serve as Mayor Pro Tem of La Marque. I was elected to the non-partisan position of city councilmember in November of 2020.
3. In addition to belonging to other organizations, I am currently a member of both LULAC and the NAACP, and a member of the Galveston County Coalition for Social Justice. I am a board member of Gulf Coast Interfaith, which is an interfaith and interracial coalition of community organizations that engage in leadership development, community organizing, and advocacy to improve Galveston County communities. I am a community leadership volunteer, external relations governmental OPS supervisor for the American Red Cross, and a disaster action team supervisor for the Red Cross.
4. In my experience as Mayor Pro Tem, and my extensive experience working with a collaborations of interfaith and interracial community organizations in Galveston County, I have seen that the Black and Latino communities in the County are affected by the same issues. As I describe in more detail below, these include, but are not limited to, access to healthcare, receiving quality education, addressing issues of voter access for minority voters, lack of representation in local government, natural disaster relief, and affordable low-income housing. The Black and Latino communities work together to advocate on these issues and vote together

to support candidates that support these issues. There is a shared history between the communities that has roots in attending the same schools, living in the same neighborhoods, and historically facing common obstacles.

5. Local Black and Latino community organizations, including LULAC and NAACP, worked closely together during the COVID-19 pandemic first on testing drives and then on vaccinations drives that were specifically focused on minority communities. We were specifically reached out to by public entities, including the Galveston County Health District, to do this work because we had knowledge of where these underserved communities are located. The communities are easily identifiable to long-time Black and Latino residents, and most of these communities fall within the boundaries of County Commissioner Precinct 3 before it was redrawn in 2021.
6. In the wake of natural disasters, Black and Latino communities have worked together to advocate for funding to rebuild their communities, and for the creation and restoration of affordable and public housing. After Hurricane Ike, when much of the public housing on Galveston Island was destroyed, Black and Latino community leaders and organizations worked very closely together to fight for the rebuilding of public housing and for other low-income housing options for those from our communities who were displaced from their homes by the disaster. After Hurricane Harvey, our communities also organized together to obtain public disaster relief funding to repair the physical damage that was done to our communities.

7. In the most recent May 2023 Election, Black and Latino voters coalesced in support of the College of the Mainland bond proposal and, based on what I observed, were the decisive factor in successfully passing the bond.
8. Blacks and Latinos have faced obstacles to participating in politics in Galveston County.
9. Over approximately the last decade, the County government has tried to cut polling locations from predominantly minority neighborhoods. This includes attempts to cut the historic Carver Park voting location. Another example is Alamo Elementary School, which was a traditional polling location in a predominantly minority area. When the County moved to countywide vote centers around 2012-2014, Alamo Elementary was removed as a location. Black and Latino organizations and residents have organized together to try to prevent these closures, but have not always been successful.
10. The communities have fought for single-member districts and against at-large districts for school boards and municipalities within the County.
11. In the past, I have worked as a precinct judge during elections. I traveled to different polling locations around the County both during Early Voting and on Election Day. Beginning with the 2008 election of President Barack Obama, I noticed a significant uptick in voter intimidation and suppression tactics aimed at the Latino community. Anglo poll watchers and campaigners would gather at polling places and target Latino-looking voters. They would try to force these voters to show them their identification to prove they were citizens. I also witnessed Anglo election workers

directing Latino voters to go to incorrect polling places. Even after stopping my work as an election judge, I have continued to see the targeting of the Latino community, for example, by questioning the registration status of individuals with Hispanic last names. Around 2019, many Latino residents in Galveston received official notices questioning their citizenship status and asking them to provide documentation to prove they are citizens.

12. Despite the County being under a court order, we have had to constantly stay on top of the County to ensure that it complied with its obligations to provide Spanish language voting access and to ensure that there are sufficient Spanish-speaking poll workers. I have witnessed a lack of outreach by the County to minority communities to ensure the availability of Spanish-speaking election workers.

13. Commissioner Holmes is my candidate of choice for Galveston County Commissioners Court in Precinct 3, and I believe he represents the interests of Black and Latino communities.

14. Commissioner Holmes has helped promote Black and Latino residents to positions in local government. For example, he has supported the nomination and appointment of Black and Latino members to the Galveston County Board of Health. He was also instrumental in my own appointment as interim Justice of the Peace when there was a vacancy for that position.

15. Commissioner Holmes has worked to support the issues important to Black and Latino communities, often being the only voice on Commissioners Court championing our issues. He has always been very receptive and supportive of

organizations such as LULAC and the NAACP, including attending their events and financially supporting their causes. I have not seen any other County Commissioners be involved in the Black and Latino communities in Galveston.

16. Based on having seen the voting patterns in the area over decades, I believe Commissioner Holmes is the preferred candidate of Black and Latino voters, and his loss would be a blow to the minority community's ability to be heard by the commissioner's court.

17. I think Commissioner Holmes will face a challenging, if not impossible, re-election campaign because his new precinct is majority-Anglo and Anglo voters in Galveston usually support different candidates than Black and Latino voters.

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

Dated this 1st day of June 2023.



JOE COMPIAN

EXHIBIT 7

*Declaration of Robert Quintero, dated
June 1, 2023*

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

TERRY PETTEWAY, et al.,

Plaintiffs,

v.

GALVESTON COUNTY, TEXAS, et al.

Defendants.

Civil Action No. 3:22-cv-57-JVB
[Lead Consolidated Case]

UNITED STATES OF AMERICA,
Plaintiff,

v.

GALVESTON COUNTY, TEXAS, et al.,

Defendants.

Civil Action No. 3:22-cv-93-JVB

DICKINSON BAY AREA BRANCH
NAACP, et al.,

,

Plaintiffs,

v.

GALVESTON COUNTY, TEXAS, et al.

Defendants.

Civil Action No. 3:22-cv-117- JVB

DECLARATION OF ROBERT QUINTERO

My name is Robert Quintero. I am over the age of 18 and capable of making this

declaration. The facts stated herein are true and within my personal knowledge.

1. I am a resident of the City of Galveston. I am 61 years old and have been a resident of Galveston my entire life.
2. Currently I work as the City Manager for the City of Jamaica Beach. I have been in this position for approximately one year. Prior to that, I worked as the Executive Director of Galveston County Community Action, which is a non-profit organization that provides social services to underserved communities. These services include rent and utility assistance, vocational and educational training, home buying seminars, case management, crime victims' services, and COVID-19 education.
3. I am currently the President of LULAC Council #151. I started my current term as President in 2022, and I have also previously served as President in the 1990s. I first joined LULAC as a youth member, and have now been a member for 49 years.
4. In my years living in Galveston County and being closely involved in the community, I have seen Black and Latino communities fight together for equal political access. These communities fought hard through litigation and advocacy in the 1980s and 90s to increase the number of single member districts across different Galveston-area elected bodies and to draw districts that provided them an opportunity to win elections. One such victory was at the Justices of the Peace and Constable levels. Last decade, however, the County reduced the number of JP and Constable districts, which had the effect of reducing the overall number of minority elected officials in the County. Similarly, after successfully fighting in the 1990s for

representative single-member districts in the City of Galveston, there were attempts to roll back those gains. The Black and Latino communities coalesced though to ensure that they maintained districts from which they could elect their preferred candidates.

5. I have seen virtually no success for minorities in the Republican Party in Galveston County. There have been very qualified local Latino candidates I know who have run for office in Republican Primaries but lost to Anglo candidates. In 2014, Donnie Quintanilla ran for judge in the County, but lost to an Anglo candidate in the Republican Primary. In 2020, Danny “DJ” Alvarez ran for Constable. He has a long track record in the Police Department, but he also lost to an Anglo in the Republican Primary. I cannot think of any Black or Latino who has had meaningful success locally with Republican voters.
6. I have witnessed a disturbing rise in the racialization of politics recently, starting with the candidacy of Barack Obama in 2008 and continuing through to today.
7. When Barack Obama ran for President in 2008 and 2012, there were white Galvestonians who made comments to me that they “would not vote for that n*****,” or “did not trust that n*****.” I had to remove some long-time local acquaintances from my social media accounts because I was disturbed by the racist rhetoric they used.
8. I have also seen increasingly radical rhetoric and action around immigration issues, which, in my experience, is closely tied to the Latino identity. This ramped up during Donald Trump’s Presidency. One example locally was the County

government's choice of how to spend federal American Rescue Plan Act funds during the COVID pandemic. These were funds that were meant to help hard-hit communities by providing direct financial assistance.

9. At the time, I was the ED of an organization that provided direct social services, and I saw firsthand that the minority communities in Galveston County desperately needed this money for utility and rent assistance. These communities were disproportionately impacted by the COVID pandemic both in terms of health and in terms of the socio-economic impact. Instead of putting the funds to this use, County Judge Henry brought forth a proposal to spend this money outside of Galveston County, towards policing the Texas-Mexico border. The minority community in Galveston strongly opposed this move, which took away resources that were intended to help it and spent the money on an unrelated issue that was important to white voters in the County. The Commissioners Court chose to hold the hearing for this issue at the League City Annex building rather than the County Courthouse.
10. During the hearing, County Judge Henry tried to justify this expenditure by saying that immigrants were bringing COVID disease across the border with them, without citing to a single piece of evidence that this was the case, much less that migrants were bringing COVID into Galveston County specifically. I felt that this imagery of immigrants spreading disease was harmful to Latinos generally, because the bulk of immigrants in Galveston are Latinos and it has been my experience that people associate the ideas of immigrants and Latinos together.

11. Whenever there have been issues that have been racially controversial, such as with the redistricting of Commissioners Court in 2021, it has been my experience that the Commissioners Court addresses those issues in a special session at the League City Annex, where there is less room for participants and observers in the actual meeting area.

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

Dated this 1ST day of June 2023.



Robert Quintero

EXHIBIT 8

*Excerpts of March 8, 2023 Deposition of
Edna Courville*

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A P P E A R A N C E S :

FOR THE PLAINTIFF(S):
Ms. Sarah Chen
Texas Civil Rights Project
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Austin, Tx 78741
schen@texascivilrightsproject.com

FOR THE DEFENDANT(S):
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Also present: Barrett Parker, Videographer
via Zoom : Tharuni Jayaraman - DOJ United States
Diana C. Vall-llobera - NAACP
Valencia Richards -- Petteway
Hilary Klein
Simone Leeper
Jaoquin Gonzalez -- Texas Civil Rights
Bernadette Reyes
Alexander Cooper
Kathryn Garrett

1 was there something in between?

2 A. I don't remember working in between. I did some
3 volunteer stuff.

4 Q. Sure.

5 A. I don't remember actually having a job in
6 between. I worked for that program for -- it was just
7 some months because it went away, too, because it's a
8 grant program. Maybe six months.

9 Q. Did you have any employment after that program
10 ended?

11 A. Oh, yeah, as a matter of fact I'm sitting here
12 now, I'm employed right now as a part-time social worker.

13 Q. And who's your employer?

14 A. La Marque Independent School District/Texas City
15 ISD.

16 Q. Okay.

17 A. Um-hmm.

18 Q. So let's back up. So between today and the time
19 the grant program ended -- let's just take it
20 chronologically -- where did you go for employment after
21 the grant program ended?

22 A. I didn't. I didn't work.

23 Q. Okay. How long --

24 A. You're talking about the grant program that's on
25 21st --

1 Q. Yes, ma'am.

2 A. -- that was in that --

3 Q. Yeah. Yeah.

4 A. Yeah, I didn't -- I didn't work for a while.

5 Q. Okay. What was your next position after --

6 A. The one that I have now.

7 Q. Okay.

8 A. Yeah, because I didn't work. That was a space
9 where I was not working. Yeah, and if I was working I was
10 volunteering.

11 Q. When did you begin your current position?

12 A. Just this year -- well, no, October. It was in
13 October 2022.

14 Q. Okay. And your title is a social worker,
15 correct?

16 A. Yeah.

17 Q. And tell me a little bit about your daily tasks
18 as a social worker.

19 A. My daily tasks there is pretty much my daily
20 tasks at GISD. Employees will ask me to check on a
21 family -- a student who belong to a family and with that I
22 would have the child's profile where I would have names,
23 addresses, phone numbers, teacher's name and so I would
24 know -- I will know who the teachers are, what kind of
25 problems the children are having and then get with parents

1 and try to set up a conference, get the teachers to try to
2 see what it is we need to do to help this kid be
3 successful this school year. And that's primarily at La
4 Marque.

5 Q. What where is your office?

6 A. It's on the first floor in La Marque -- in the
7 building. I don't, have you ever?

8 Q. I have not. Is it just in the administrative
9 building for the ISD?

10 A. No, it's not in the administration building for
11 the ISD, the administration building is on Palmer Highway.

12 Q. Um-hmm.

13 A. No, this is in the building of La Marque school
14 where the kids are having school from nine through 12th
15 grade.

16 Q. Okay, alright. And so I think that is a pretty
17 good picture of all of your employment and educational
18 experience --

19 A. Um-hmm.

20 Q. -- but I'd like to go back and talk about some of
21 the organizations that you're a member of.

22 A. Um-hmm.

23 Q. And so let's just start with today. You
24 mentioned the NAACP Mainland Branch, correct?

25 A. Um-hmm. Um-hmm.

1 sorority, we just support community people, groups, and
2 whatever they are.

3 Q. Okay. Let me go, kind of switch gears a little
4 bit. Just trying to kind of book-end everything. So,
5 alright, so you a plaintiff in this lawsuit, right?

6 A. Yes.

7 Q. And can you tell me a little bit about what you
8 believe this lawsuit is about?

9 A. I believe this lawsuit is about the -- the way
10 that the maps have been constructed in terms of -- of our
11 -- when I say "our and we," in this instance when I'm
12 talking to you about that community, I am part of the
13 community, and I'm telling you now if you were to ask
14 anyone in the community who they would like to come and
15 speak or any, I don't care what it is, any issue, any
16 subject, my name will come up and one of the fellow's name
17 will come.

18 That's been going on with me for years and
19 for why I will never know, but -- and that's why when I
20 say "we, us, our," I'm talking community because I am the
21 community.

22 Q. Okay. And when you talk about the community,
23 what area are you talking about?

24 A. I'm talking about the needs of the -- let me see,
25 that's different levels, too. The needs of the people who

1 A. They said that.

2 Q. Okay.

3 MS. OLALDE: And just for scheduling
4 purposes we may need to take a lunch.

5 A. Um-hmm.

6 MS. OLALDE: So whenever you guys feel
7 like you're ready to take one just we can work that out.

8 MS. CHEN: That will be up to you.

9 THE WITNESS: The lunch?

10 MS. OLALDE: Maybe around 12:00, another
11 half hour if that's okay.

12 A. So we'll be going longer. Is that what you
13 saying? I don't understand.

14 BY MS. OLALDE:

15 Q. Yeah -- that's okay, we'll move on. I'll ask you
16 a question.

17 Have you ever talked with Commissioner Holmes
18 about redistricting?

19 A. I didn't talk with him about redistricting. No,
20 I have not talked with him about that.

21 Q. Okay. But you know Commissioner Holmes, right?

22 A. Yes.

23 Q. How long have you known him?

24 A. Long time. I can say 20 years, 30 years even.

25 Long time.

1 Q. Okay. And he was your commissioner prior to the
2 adoption of the new map, right?

3 A. Yes.

4 Q. And who is your commissioner now?

5 A. Robert Armstrong, Dr. Armstrong.

6 Q. Okay. Did you ever interact with Commissioner
7 Holmes in his capacity as a commissioner for Galveston
8 County before the maps were redrawn?

9 A. Yes.

10 Q. Okay.

11 A. Whenever we had concerns. When I say, "we," I
12 mean the community. We had concerns that he -- we wanted
13 him to bring to the commission so that they could maybe
14 take a look at it, see what they could do to help us.
15 Transportation for elderly, to help facilities, and that
16 kind of stuff. Yes, that's what I talked with him about
17 whenever we did talk, and senior citizen issues. Yeah.

18 Q. Okay. Apart from transportation to health
19 facilities, can you give me more examples of what you
20 talked with Commissioner Holmes about?

21 A. What could be done to assist in the area of
22 education, and mostly my concerns in conversations with
23 him dealt with issues centered around senior citizens,
24 their needs, and what we could do to help them primarily.

25 Q. Okay. So breaking that down a little bit. With

1 respect to education, what kind of questions would you
2 have for Commissioner Holmes about assisting the community
3 with education issues?

4 A. What kind of questions would I have for him?

5 Q. Right.

6 A. I would ask him if he would -- if he knew whether
7 or not the commissioner's court had -- I'm just going to
8 say a pot of money, bucket of money that they could
9 probably use to help kids, for an example, who did not
10 have money to go to -- maybe to the zoo or whatever and if
11 he could look into that and see if we could not use it for
12 transportation for the kids to get to the zoo or for the
13 kids to go anywhere for educational purposes. And he
14 would at least listen.

15 Q. Okay.

16 A. Um-hmm.

17 Q. Was he ever able to answer those types of
18 questions with an actual action and -- and providing funds
19 for the kids to get to the zoo?

20 A. He would actually follow through that --

21 Q. Sure.

22 A. -- you know, trying to do that, yes. Yes.

23 Q. Okay. Do you know if it actually happen? Like
24 if -- if the commissioner's court set aside funds to help
25 children take field trips?

1 MS. OLALDE: Well, here's the thing, I'm
2 marking exhibits for the deposition, and if you want to
3 power through -- I mean, if you want to take a break and
4 try to find all of the exhibits with the -- the bates
5 number that you want to find them with, you're more than
6 welcome to.

7 MS. CHEN: We'll continue to search for
8 them. I just wanted to seek clarification considering
9 they currently don't have his information on them, which
10 will be very useful. So you can continue right now.

11 MS. OLALDE: Marking Exhibit 12.

12 (Exhibit 12 was marked for
13 identification.)

14 Q. My first question is if you recall this article
15 that you wrote?

16 A. Voter suppression is alive and well, yeah.

17 Q. Yes, ma'am.

18 A. I do remember that.

19 Q. Did you read -- or I guess my first question is:
20 You didn't produce this document to your attorneys, right,
21 as it stands.

22 A. No, I don't -- I don't remember it, no.

23 Q. Okay.

24 A. Not like this. This looks like what's cut -- all
25 of this came from the Galveston Daily News looks like.

1 Q. Um-hmm.

2 A. Yeah, and I know that would be a column that I
3 wrote, an op-ed for the Galveston Daily News.

4 Q. Do you save your columns that you write?

5 A. Some I have, and some I don't.

6 Q. Okay.

7 A. Yeah.

8 Q. Did you provide any of those columns to counsel
9 in this case?

10 A. If they were in my e-mails -- and I probably did
11 e-mail this to the paper. Yeah, I did. That's op-eds --

12 Q. Okay. But --

13 A. -- for the Galveston Daily News. This was to the
14 Galveston Daily News.

15 Q. -- but you wouldn't have submitted, like, paper
16 clipping, newspaper clipping to --

17 A. Oh, no.

18 Q. -- to counsel? Okay.

19 A. No, I don't even know if I kept it. When I write
20 stuff like this and it goes into the newspaper, okay, I'm
21 done.

22 Q. Okay. Did you read the article about your
23 comment?

24 A. Before or after?

25 Q. At the time that this was published.

1 A. No.

2 Q. Okay. Do you know who did the highlighting on
3 this article?

4 A. No.

5 Q. There's some really faint underlining. Do you
6 know who did the underlining on this article?

7 A. The article that's above my article? No. No, I
8 have no idea, and I don't know Andy Mann.

9 Q. Okay. Going back to your voter suppression
10 article, what prompted you to write this article?

11 A. Probably that very first sentence that I wrote on
12 there is what I imagine how astonished I felt the morning
13 of June 29th when I opened my paper and read the story
14 about where to vote in Galveston County.

15 Auh, and they left off Carver Center. Now
16 it's coming back. They left Carver Center off of the
17 voting place, and that is -- I mean, that's the humbug for
18 voting in -- in Texas City.

19 Q. Did you have any conversation --

20 A. For --

21 Q. Oh, I'm sorry.

22 A. -- for Precinct 336 at that time.

23 Q. Okay. Did you have any conversations with any
24 elected officials about what you don't -- what you talk
25 about in this comment?

1 A. Any conversation?

2 Q. Um-hmm.

3 A. I probably called Dwight Sullivan's office
4 because that's what I would have done because Dwight
5 Sullivan is the person who's over the voting in the area.

6 Q. Okay.

7 A. I probably called him.

8 Q. Do you recall having any conversations with
9 Mr. Sullivan or his staff about this?

10 A. If I called that office they answered the phone
11 and I did talk with somebody. I'm not sure who. I'm not
12 sure if it was Sullivan himself or if I talked with one of
13 the receptionists, but somebody answered the phone.

14 Q. Did you ever get an explanation as to why this
15 voting location was not accessible at this time?

16 A. They didn't tell me.

17 Q. Okay. Were you --

18 A. They just opened it the last -- the next time we
19 had -- there was voting it was opened again.

20 Q. Okay, good. For this cycle that you're referring
21 in the 2020 comment, were you able to vote in that cycle?

22 A. Oh, yeah.

23 Q. Okay. Is there anybody in your community that
24 was not able to vote?

25 MS. CHEN: Objection, speculation.

1 Q. That you're aware of?

2 A. That is speculation. No, I don't know.

3 Q. Okay. Who were you hoping would read this

4 comment?

5 A. People who were getting the newspaper. People

6 who vote. If they were voters, they voted every year.

7 People who had a hard time trying to find where else they

8 needed to go because I think they was sending the people

9 to Texas City down on, like, I think they call it the

10 Loop, on the loop. But in Texas City.

11 Texas City where this place was so close to

12 their homes. The other place they would have had to get a

13 taxi, get a ride from somebody else and go to vote. So --

14 and I don't know who was affected in that way.

15 MS. OLALDE: I'm going to mark Exhibit

16 13.

17 (Exhibit 13 was marked for

18 identification.)

19 Q. And my first question is just going to be whether

20 or not you recall seeing this article before?

21 A. I did read this one. This was a comment based on

22 my op-ed there I think, yeah.

23 Q. Do you know who Joseph Pelto is?

24 A. No, never spoke with him.

25 Q. Okay. When you read his comment, what was your

1 THE VIDEOGRAPHER: We're back on the
2 record. The time is 2:17.

3 BY MS. OLALDE:

4 Q. Ms. Courville -- or Dr. Courville, have you ever
5 worked with LULAC or any LULAC organization?

6 A. When you say "work with them," what -- what do
7 you mean?

8 Q. Have you ever had any involvement in any capacity
9 with LULAC?

10 A. Oh, with any capacity, yeah, I just call them
11 for -- for a young woman to -- just to be a resource for
12 her.

13 Q. Okay.

14 A. Who I felt like could use what they were
15 offering.

16 Q. Okay.

17 A. And I did that -- not the last month, but it was
18 -- it was -- it had nothing to do with the lawsuit, map,
19 or none of this.

20 Q. Right.

21 A. It had everything to do with the fact that she
22 needed some help.

23 Q. So apart from reaching out to LULAC to make a
24 connection --

25 A. Right.

1 Q. Okay. But you don't know for sure?

2 A. No.

3 Q. Okay. Are you familiar with Bolivar? Like the
4 -- let's start with racial demographics. Are you
5 familiar with racial demographics in Bolivar?

6 A. No except that I think most of the folk who
7 live on -- on Bolivar are Anglo.

8 Q. Okay.

9 A. I don't think there are many minorities in
10 Bolivar at all.

11 Q. Okay. But on what -- what do you base that --
12 that opinion on?

13 A. When I was working for GISD and the kids who
14 lived in Bolivar basically they went to private schools.
15 They didn't even do public schools.

16 Q. Okay.

17 A. Even way back then, so I can imagine it's true
18 today. I don't know.

19 Q. Okay. What about the voting statistics from
20 Bolivar? Are you familiar with those? Do you have
21 personal knowledge of that?

22 A. No, I never paid any attention.

23 Q. Okay. Are you very familiar with the League City
24 area?

25 A. No.

1 Q. Okay. Are you very familiar with the Santa Fe
2 area?

3 A. No. No, I'm not. That's one area -- yeah, no.

4 Q. Okay.

5 A. No. Not very nice to minorities in Santa Fe,
6 especially when I first moved here.

7 Q. Okay.

8 A. They literally had signs on the road saying, you
9 know, if you're Black don't go beyond this sign kind of
10 thing for Santa Fe back then.

11 Q. That was in 1960s?

12 A. Um-hmm. Yeah, may be one over there now for all
13 I know. I don't know.

14 Q. But you don't -- you haven't seen anything like
15 that --

16 A. No.

17 Q. -- recently?

18 A. No, I have not.

19 Q. Thank goodness.

20 A. Yes.

21 Q. Okay. But is it fair to say that Santa Fe -- or
22 let's do it a little bit broader. Is it fair to say that
23 race relations have improved in Galveston County from the
24 1960s to today?

25 MS. CHEN: Objection, speculation.

1 A. No, they're deteriorating. They're deteriorating
2 now. I mean, they were beginning to be good maybe in the
3 mid 70s, early 80s. Race relations are deteriorating,
4 yeah, in this county, in this county period. There are so
5 many mean people out there, kid you not.

6 Q. You said that they were better in -- race
7 relations were better in the 70s, right?

8 A. 70s and 80s, um-hmm.

9 Q. 70s and 80s?

10 A. Um-hmm.

11 Q. And they started to deteriorate in the 90s?

12 A. I think so, yeah.

13 Q. Can you give me some examples of how things
14 started to change or deteriorate?

15 A. Examples would be how -- how parents -- you know,
16 most of my experiences have been with the school district,
17 how parents respect or don't respect teachers anymore.
18 How the kids pick up on their parents' behaviors and
19 they're the same way. Right now I don't know that I could
20 be a teacher because of the way that -- that children
21 don't respect teachers anymore.

22 They don't respect authority, let me just put
23 it that way. And according to me and with my experiences
24 that kind of behavior comes from home. The first thing I
25 would tell a parent, any parent, it doesn't matter the

1 color of their skin, when they get called in by me because
2 their child has done something to a teacher, cursed a
3 teacher and that parent sit before me and do like you're
4 doing sort of nodding their head, they say -- the next
5 thing come out of their mouth, I don't know where he or
6 she heard that from.

7 My answer to them more often than not is that
8 they heard it from your house, ma'am or sir. That's where
9 they heard it, and so you need to get a grip. And we go
10 from there. Because I mean, it's just that blatant. And
11 now it's just out there, and it's been out there since I
12 think Donald Trump stuff. I really do believe that. And
13 nobody can make me not believe that. I mean, he turned --
14 he turned the monsters loose. And now they want to bring
15 it back in. It's too late.

16 Q. Can you give me just a few examples of what you
17 perceived to be racism within Galveston County over the
18 past five, ten years?

19 A. What I perceive to be racism?

20 Q. Racist, yes.

21 A. Racist. Just simply by the way that when I was
22 working, you know, part time for organizations we were
23 helping people with rental assistance or assistance for
24 any kind of emergency, getting their lights and water and
25 stuff like that on, and I knew where the pots of money was

1 supposed to be coming, there are chunks of money that was
2 set aside by the federal government for those kinds of
3 programs.

4 And I knew that Galveston County got some,
5 and they were using the money to send people to the border
6 or wherever they were building this fence, to build the
7 fence. They used the money. Mark Henry did that, and I
8 can't remember how many hundreds of thousands of dollars
9 he did that with.

10 Q. Do you know if any of that money actually left
11 the county and went to the boarder?

12 A. They went to the -- he paid the people to go
13 build the fence that's not built yet.

14 Q. But do you -- do you have any personal knowledge
15 of whether any of that actually occurred?

16 A. No personal knowledge.

17 Q. Okay. When we were talking about the -- I
18 believe it was the Carver Center that was closed as an
19 election site, voting site.

20 A. Um-hmm.

21 Q. Do you know why it was closed for that -- for
22 that term in 2020?

23 A. Oh, I don't --

24 MS. CHEN: Objection, speculation.

25 Q. If you know.

1 Getting ready to build at that time, I believe, the three
2 elementary schools. That's primarily what we did, uh-hmm.

3 Q. And did that include Black members of your
4 community?

5 A. Yes, everybody.

6 Q. And that would include Hispanic and Latino --

7 A. Yes.

8 Q. -- that lives in the community as well?

9 A. Yes. Whoever had kids, we thought, would be
10 going to the school, yes.

11 Q. Would you see that a majority of the students in
12 those schools were racial minorities?

13 A. Yes. Yeah.

14 Q. And would you say that Black and Latino voters
15 have shared policy priorities regarding education?

16 A. Yes. Yeah. And primarily what it is, is that we
17 all want the same thing for our children. We want them to
18 have a good, round -- rounded education. Yes. And to
19 be -- to be ready to face the real world once they get out
20 of school.

21 Q. And so you saw people coming together to support
22 the school bond --

23 A. Absolutely. And they did in a big way. They've
24 done that twice.

25 Q. When was the other time?

1 have time to attend some of these community functions?

2 No, he doesn't. He doesn't have the time.

3 Q. Um-hmm.

4 A. If you're in charge of three or four nursing
5 homes, they're your nursing homes -- and he's also the
6 director, I believe, of the hospital in the Mainland --
7 used to be Mainland Hospital, which is now part of the
8 HCA, Houston something -- what is HCA? Houston something
9 Health -- HCA that -- well, anyway, he's over that now, so
10 no, he didn't have time. He won't have time to be a
11 commissioner. He won't. He won't have time to listen to
12 people, answer -- answer phone calls, e-mails, or nothing.

13 Q. And he's lived in the county for some time,
14 right?

15 A. He's in Friendswood, I believe; so that -- you
16 know, that part of it's Galveston County --

17 Q. Um-hmm.

18 A. -- and part of it is Harris County. Friendswood.

19 Q. But in all that time you have not seen him be as
20 engaged with the community?

21 A. No. No, I have not.

22 Q. You also mentioned earlier that you felt the
23 commissioner's court was intentionally denying folks the
24 right to vote.

25 A. Yes.

1 Q. That it was intentionally racist.

2 A. Yes.

3 Q. And that was part of a discussion of keeping
4 Galveston red.

5 A. Yes.

6 Q. Do you recall?

7 A. Yes.

8 Q. Can you explain how you think keeping Galveston
9 red relates to intentional racism and denying people the
10 right to vote?

11 A. Keeping Galveston red, the county is keeping in
12 lockstep with the State of Texas who is big on being red,
13 one of the red states. As -- as Georgia or any of the
14 other southern states that are red. That's -- that's --
15 that's what they do. And if you are a red county in a red
16 state, that probably gives you a little bit of an edge in
17 terms of being able to get certain amenities from the
18 state that some of the other counties would not get, the
19 democratic counties, or, well, they don't call them
20 democratic, they call them blue. The blue counties --

21 Q. Um-hmm.

22 A. -- so keeping it red -- yeah, so keeping it red
23 and what -- I don't know if that -- is that answering your
24 question? Am I getting to it?

25 Q. Well, I wanted to know how that related to what

1 you said about intentional racism. Because you also said
2 that, that was related to be intentionally racist.

3 A. Well, when you think of the term red, that's what
4 it is. It's the confederacy of -- that's how I see it.
5 That's what I relate it to, and that is racist. I mean,
6 that whole idea of we're the confederate, you know, we
7 beat the other people or whatever, it's just crazy; and in
8 my head it's crazy.

9 I can't even wrap my head around the
10 connotations of things like that anymore, but a red state
11 is a racist state. It's like the red stands for racist.

12 Q. Are you saying that you associate the republican
13 party, the red party with the confederacy from the U.S.
14 Civil War?

15 A. You bet. I do. And -- yeah, no doubt about it.
16 No doubt about it. And it really got to be -- you know,
17 it's always been like a small murmur of things, but
18 since -- since Donald Trump, I mean, it's out there,
19 that's what it is. I mean, look, if that guy could turn
20 this whole nation into one -- one race of people, it would
21 be white Anglo Christians or however they put it.

22 And I don't understand how any Christian, no
23 matter the color of the skin could think like they think.
24 A Christian is a Christian, never mind what color you are,
25 the color of your skin. That's a philosophy, that's an

1 idea. But you got to be -- to get along with him and his
2 folk, you got to be White, some kind of Christian, and I'm
3 going, Why are they using that word Christian? It's
4 nothing Christian about that. There's nothing Christian
5 about killing women just because they're woman. Yeah, but
6 that's what they do.

7 Q. So the confederacy also came up in an earlier
8 exhibit, do you know of any issues involving things like
9 showing somebody the confederacy, confederate monuments in
10 Galveston County?

11 A. There have been -- there have been issues, yes,
12 with monuments here on the island wanting to move them or
13 wanting to remove flags or -- and I really didn't get
14 into, you know, all of it; but, yes, there have been some
15 real issues with the confederacy right here on this
16 island. It's absolutely unbelievable.

17 Q. Do you know if any commissioners or the county
18 judge supported removal of these statues or was against
19 the confederate monuments?

20 A. What I could read in the paper they were against
21 having them removed --

22 Q. Um-hmm.

23 A. -- to be sure they didn't want them to be
24 removed. So I guess the answer to that would be, you
25 know, yeah. Well, you said were they against them, no,

1 they were for them.

2 Q. Do you recall Commissioner Holmes' position?

3 A. He was -- he was wanting to do the right thing
4 with that. He was listening to his constituents. The
5 other folks had constituents, too, on both sides. I mean,
6 on both sides of the -- of the issue. They had Black
7 folks saying, you know, the confederate flag is not okay.
8 They had some White folks saying confederate flags are not
9 okay, that kind of thing, that, that war ended, you know,
10 and yada, yada, yada.

11 So and Commissioner Holmes would have come --
12 come down on the -- on the side of what's right, what's
13 fair, and what's right.

14 Q. Thank you.

15 A. That's it?

16 Q. Can you give me just a second to --

17 A. Okay.

18 Q. -- to take a look at my notes.

19 Alright, I think that, that concludes my
20 questions.

21 A. Okay.

22 Q. Thank you so much, Ms. Courville.

23 A. You're more than welcome.

24 E X A M I N A T I O N

25 BY MS. OLALDE:

Edna Courville
March 08, 2023

EC

CHANGES AND SIGNATURE

EDNA COURVILLE

MARCH 8, 2023

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PAGE	LINE	CHANGE	REASON FOR CHANGE
	page 19 line 5:	"children shelter" should be "children's shelter"	
	page 19 line 24:	"Busey" to "Bucy"	
	page 20 line 18:	"went to school" should be "went to work"	
	page 24 line 25:	"going away" should be "anyway"	
	page 25 line 1:	"SA part" should be "essay part"	
	page 25 line 15:	"working the social worker" should be "working as a social worker"	
	page 31 line 4:	"loves ones" should be "loved ones"	
	page 36 line 7:	"I don't, have you ever?" should be "I don't know, have you ever been?"	
	page 37 line 5:	is "Leah Perriman Group" right?	
	page 37 line 11:	"now computers" should be "own or know computers"?	
	page 39 line 17:	"stabilize" should be "mobilize"?	
	page 40 lines 16-17:	"one of the fellow's names will come" -- do you know what you meant by this?	
	page 41 line 9:	"was a meeting" should be "was in a meeting"	
	page 45 line 9:	"pass" should be "past"	page 46 line 7: "passed" should be "past"
	page 46 line 19:	"passed" should be "past"	page 52 line 22: "tired" should be "tried"
	page 53 line 2:	"plenty of newspapers" and "copies of op-eds"	
	page 50 lines 14-15:	"population's concern" should be "population is concerned"	
	page 62 line 2:	"facility's" should be "facilities"	
	page 71 line 11:	"In" should be "Hence"	
	page 72 line 6:	"there" should be "they"	
	page 80 line 12:	"major" should be "mayor" both times in that sentence	
	page 81 line 21:	"Nickey Shapaul" should be "Nakisha Paul"	
	page 97 line 5:	"independence" should be "independents"	
	page 112 line 4:	"Robert" should be "Robin"	
	page 116 line 7:	"would of" should be "would have"	
	page 123 line 25:	"signed" should be "sign"	
	page 136 line 13:	"communities" should be "community"	
	page 151 line 20:	"1010" should be "2010"	
	page 160 line 17:	"counsel" should be "council"	
	page 167 line 17:	"humbug" should be "hub"	
	page 170 line 17:	"rational" should be "rationate"	
	page 173 line 1:	"to this" should be "to do this"	
	page 175 line 5:	"functionable" should be "functional"	
	page 207 line 11:	"saw" should be "say"	
	page 208 line 21:	"basic" should be "base of"	
	page 217 line 17:	is it Stingray Stadium or Stingaree Stadium?	

Edna Courville
March 08, 2023

1 I, EDNA COURVILLE, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.

4 Edna Courville
EDNA COURVILLE

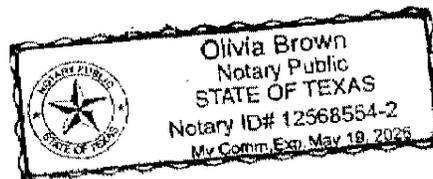
6
7 THE STATE OF TEXAS*

8 COUNTY OF Galveston

9 Before me, Olivia Brown, on this day
10 personally appeared EDNA COURVILLE, proved to me under
11 oath or through Texas DL) (description of identity card
12 or other document) to be the person whose name is
13 subscribed to the foregoing instrument and acknowledged to
14 me that they executed the same for the purposes and
15 consideration therein expressed.

16 Given under my hand and seal of this 14 day of
17 April, 2023.

19 Olivia Brown
20 NOTARY PUBLIC IN AND FOR
21 THE STATE OF TEXAS



22
23
24
25

EXHIBIT 9

Exhibit 12 from the March 8, 2023

*Deposition of
Edna Courville*

EXHIBIT 10

*Excerpts of April 26, 2023 Deposition of
Lucretia Henderson Lofton, as
Dickinson Bay Area NAACP Corporate
Representative and in her individual
capacity*

Lucretia Lofton

April 26, 2023

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

TERRY PETTEWAY, THE HONORABLE)
DERRECK ROSE, MICHAEL MONTEZ,)
SONNY JAMES and PENNY POPE,)
Plaintiffs,)
)
V.) Civil Action No.
) 3:22-cv-57

GALVESTON COUNTY, TEXAS, and)
HONORABLE MARK HENRY, in his)
official capacity as Galveston)
County Judge,)
Defendants.)

UNITED STATES OF AMERICA,)
Plaintiff,)
)
V.) Civil Action No.
) 3:22-cv-93

GALVESTON COUNTY, TEXAS,)
GALVESTON COUNTY COMMISSIONERS)
COURT, and HONORABLE MARK)
HENRY, in his official)
Capacity as Galveston County)
Judge,)
Defendants.)

DICKINSON BAY AREA BRANCH)
NAACP, GALVESTON BRANCH NAACP,)
MAINLAND BRANCH NAACP,)
GALVESTON LULAC COUNCIL 151,)
EDNA COURVILLE, JOE A.)
COMPIAN, and LEON PHILLIPS,)
Plaintiffs,)
)
V.) Civil Action No.
) 3:22-cv-117

GALVESTON COUNTY, TEXAS,)
HONORABLE MARK HENRY, in his)
Official capacity as Galveston)
County Judge, and DWIGHT D.)
SULLIVAN, in his official)
Capacity as Galveston County)
Judge,)
Defendants.)

Lucretia Lofton

April 26, 2023

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ORAL AND VIDEOTAPED DEPOSITION OF
LUCRETIA LOFTON INDIVIDUALLY AND AS
CORPORATE REPRESENTATIVE OF
DICKINSON BAY AREA BRANCH NAACP
APRIL 26, 2023

ORAL AND VIDEOTAPED DEPOSITION OF LUCRETIA LOFTON,
produced as a witness at the instance of DEFENDANTS,
and duly sworn, was taken in the above-styled and
numbered cause on Wednesday, APRIL 26, 2023, from 9:25
a.m. to 5:39 p.m., before Kathleen Rossi Tyler, CSR in
and for the State of Texas, recorded by machine
shorthand, at the offices of GREER HERZ & ADAMS, LLP,
2525 South Shore Boulevard, Suite 203, League City,
Texas, pursuant to the Federal Rules of Civil Procedure
and the provisions stated on the record or attached
hereto; that the deposition shall be read and signed
before any notary public.

JOB NO. 6363421-001

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A P P E A R A N C E S

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VIDEOGRAPHER:

MR. BILL HARTLEY

ALSO PRESENT:

MR. BRANDON GUERRERO

1 at. Do you -- are there multiples that you're aware
2 of?

3 A. To my knowledge.

4 Q. Okay. And specifically, members of your unit
5 that would have been able to vote in old Precinct 3?

6 A. Yes.

7 Q. Okay. All right. So -- and I'm aware -- well,
8 let me ask you this way: How closely would you say the
9 -- you -- NAACP Dickinson Bay Area Branch works with
10 the area LULAC organization?

11 A. Closely.

12 Q. Pretty close?

13 A. (Nodding head.)

14 Q. Are there any particular projects that you can
15 recall since you've been a member of the unit where
16 both those organizations work together?

17 A. Is there a particular event? Is that what
18 you're asking?

19 Q. You can start, yes, with events. That's a --
20 one good -- one way to look at it.

21 A. There are -- there -- we -- as nonpartisan
22 organizations that advocate for people of color, we
23 collectively get together in capacities to talk about
24 how things are impacting our communities.

25 Q. How often does that happen?

1 A. How often has it happened while I was president
2 is what I can speak on.

3 Q. Okay. Well, we can start -- yeah. We can
4 start with that.

5 A. It's been a few times.

6 Q. there -- are there any that are unrelated to
7 this lawsuit, to the redistricting effort that
8 culminated in this suit?

9 A. Unrelated to redistricting?

10 Q. Yes.

11 A. Yes.

12 Q. And what were those?

13 A. We formed a correlation [sic] to gather the
14 -- the Hispanic and Black businesses in the area. Not
15 specific to redistricting, though. But, I mean, just
16 something to show that -- with the Black and brown
17 businesses -- small businesses look like in the area.
18 And that was compose -- composed of NAACP and LULAC.

19 Q. Okay. And -- and when did that happen?

20 A. Before -- before this. So I believe it was 20
21 -- I'm not sure. I would have to look at my e-mails to
22 really clarify the date.

23 Q. Uh-huh.

24 A. I don't want to misspeak a date, but, yeah, we
25 did something that didn't have -- that -- those

1 meetings didn't have anything to do with redistricting
2 or anything like that. It was all to support one
3 another's communities and to show that we are united
4 and we are in support of one another.

5 Q. Okay. Is it -- in your history with NAACP, u-
6 -- the unit, is it -- do you remember any instances
7 where the NAACP and LULAC's interests diverged, were
8 different?

9 A. Not to my knowledge.

10 Q. Okay. Do you have any belief as to, you know,
11 what -- what happens to the -- what would happen to the
12 -- the -- in a situation where the two parties were
13 working together on something but there wasn't
14 divergent interest, a different interest?

15 MS. CHEN: Objection, form.

16 A. I can't speak to that. I have no knowledge
17 of --

18 Q. (BY MR. RUSSO) You ever see that happen?

19 A. No.

20 Q. No. Does the NAACP have any marketing efforts
21 that you're aware of that specifically target Latinos?

22 A. The NAACP marketing is inclusive. So it will
23 not just target a specific group. It's inclusive.

24 Q. Okay. So -- but there's nothing that you can
25 recall that is like -- that is the effort of let's --

1 Q. And what is it that makes you believe that?

2 A. The one minority-majority precinct split in
3 several ways, and that one minority-majority precinct
4 was minority majority of Black and Hispanic.

5 Q. Uh-huh.

6 A. And there was these -- the map that was used
7 was very similar to the map that was used and proven
8 before that was found discriminatory and also used the
9 same person to draw the maps.

10 Q. Uh-huh.

11 A. Also, the people who were most affected by it
12 were not communicated in a manner in which they are
13 known for communication, which is a senior population
14 that did not know a lot about what was going on.
15 However, there were things on the Internet that were --
16 a judge clearly states "Go vote for Map 2" in support
17 of the redistricting.

18 Q. Uh-huh. Ye- --

19 A. However, the seniors in Precinct 3 -- the old
20 Precinct 3 --

21 Q. Uh-huh.

22 A. -- typically did not have Internet access or
23 even know how to utilize the Internet.

24 Q. Okay. And somehow the use of the Internet
25 indicates to you that the -- the drawing of the lines

1 or redrawing of Precinct 3 is a racial gerrymandering
2 versus partisan?

3 MS. CHEN: Objection, form.

4 A. There were a few other things that contribute
5 to that. That's a component of it. The people in
6 Precinct 3 -- the Black and brown people in Precinct 3,
7 they were not given information in -- where they
8 receive it to be aware of it. So that's why they
9 showed up at a meeting in a mass amount in a small
10 building --

11 Q. (BY MR. RUSSO) Uh-huh.

12 A. -- versus probably the counterpart to voting
13 online.

14 Q. I'm trying to unpack that. I'm not sure I
15 understand how it is that the use of the Internet leads
16 you to conclude that -- that racial gerrymandering
17 occurred in the county's drawing of maps.

18 A. It's a component. It's not a --

19 MS. CHEN: Objection, form.

20 Q. (BY MR. RUSSO) Sorry. It's a component? It's
21 a component?

22 A. Yes.

23 Q. Well, would it have been better for the county
24 not to use the Internet and --

25 MS. CHEN: Objection, form.

1 minority groups in Galveston Cou- -- County bear the
2 effects of discrimination in, you know, various ways
3 like education, employment, housing, healthcare? You
4 believe that to be true?

5 A. Yes.

6 Q. Can you tell me how it is that those areas that
7 you believe that Black and Latino voters are
8 discriminated against, how does that affect or -- or
9 hinder their ability to be involved in the voting
10 process to vote?

11 MS. CHEN: Objection, form.

12 A. Can you --

13 Q. (BY MR. RUSSO) Yeah. I'm specifically trying
14 to understand how it is that if you bel- -- if you
15 believe -- and I think you do -- that this -- Black and
16 Latino citizens in Galveston County have -- are
17 impacted --

18 A. Similarly?

19 Q. Sorry.

20 A. Are impacted similarly?

21 Q. Impact similar through -- through education,
22 employment, health, that kind of thing. But what I'm
23 trying to ask you is: How does -- how does that relate
24 to or hinder their ability to be involved in the voting
25 process?

1 A. It affects a lot.

2 Q. Are there any specific examples you can give
3 me?

4 A. One -- the -- the things really overlap. You
5 have to be educated enough to know what you're voting
6 for to understand the process of voting to know the --
7 the -- your options --

8 Q. Uh-huh.

9 A. -- of voting, if you can register to vote, if
10 -- where can you go to vote, what is early voting, what
11 does voting on election day means? If you're not in
12 the best of health, can you have an option to do a
13 mail-in vote? Do you -- so those type of -- of things,
14 they overlap with one another because people don't have
15 all of the resources all of the time.

16 Q. Uh-huh.

17 A. And then they are not as motivated to go and
18 receive that type of information because they may not
19 know, A, where to go, or may not be comfortable with
20 asking people that don't resemble them and they have
21 their same needs.

22 Q. Yeah. The -- are there any specific examples
23 you can think of, people your -- in your answer that
24 you're actually talking about, people that you know
25 that have that issue, again, being -- the fact that

1 they're, for example, have a -- aren't educated as

2 well, the --

3 A. Yeah.

4 Q. -- they're hindered from being able to vote?

5 A. Hindered from being able to vote?

6 Q. Yes, ma'am.

7 A. Yeah. So there are people who are felons who

8 think that they cannot absolute vote at all, that they

9 can't even register to vote.

10 Q. You said people who have been convicted of a

11 felony?

12 A. People been convicted of a felony in the past

13 and think that they just absolutely cannot vote.

14 There's people that think that because of their

15 different -- not having the knowledge of certain, as I

16 said before, locations, time periods, when to register,

17 how do I register? Do -- can I go to the DPS office

18 and register? Where can I get registered to vote at?

19 Q. Uh-huh.

20 A. Those -- all of those things hinder people from

21 voting.

22 Q. And in those instances you just gave me, you

23 think that they're -- that they're -- their situation,

24 first of all, I guess, they're Black or Latino, but

25 they also have experienced some kind of discrimination

1 that's put them in that position?

2 A. Yes.

3 Q. In terms of the felon that you referred to,
4 what was that discrimination that you're thinking
5 incurred?

6 A. No. Someone told -- someone literally came to
7 me and said, "Well, I was told because I was a felon
8 I'd never be able to vote again."

9 Q. Do you know who told them that?

10 A. No. I didn't ask them who told them that, but
11 I know that they had misinformation.

12 Q. They had what?

13 A. Misinformation.

14 Q. Oh, okay. But we don't know where the
15 information came from?

16 A. We don't know where the information came from,
17 no.

18 Q. All right.

19 A. But I know that there is a lot of
20 misinformation, and they're not as comfortable coming
21 -- going to people who they don't see representation
22 with --

23 Q. Uh-huh.

24 A. -- to understand it, and sometimes it's even
25 difficult for them --

1 Q. Interesting.

2 A. Very much so.

3 Q. As -- okay. Speaking of the county -- the
4 commissioners, do you believe that the elected county
5 commissioners have been sort of unresponsive to the
6 needs of minority communities, specifically Black and
7 Latino residents?

8 A. What time period are you speaking of?

9 Q. Well, let's -- let's talk about the last ten
10 years.

11 A. If you going to the community of the Black and
12 Latino, specifically Precinct 3, they praise
13 Commissioner Holmes.

14 Q. People within the Precinct 3?

15 A. The seniors, every -- I -- they speak of --
16 speak highly of the things --

17 Q. Uh-huh.

18 A. My grandmother speaks highly of the things that
19 he has done.

20 Q. Right. And he hasn't been unresponsive to the
21 community. Would you agree?

22 A. I would agree.

23 Q. Okay. And then what about the other
24 commissioners? Do you know whether they've been
25 responsive to the community or not?

1 A. I don't know that.

2 Q. Okay. And then let's expand it beyond the
3 county commission and talk about other elected
4 officials that you are aware of. Generally speaking,
5 do the -- the account -- the government officials that
6 you know in Galveston County, they -- they typically
7 -- are they typically fairly responsive --

8 A. From what I --

9 Q. -- to the needs of the minorities?

10 A. From -- from what I -- in the last ten years?

11 Q. Yes, ma'am.

12 A. Oh, okay. Ten years is beyond my scope as a
13 NAACP president. That was -- now, as an individual --

14 Q. Well, again, from 2013 to -- to today is where
15 the area we're focusing on, so --

16 A. From 2013 to today?

17 Q. And the -- I could restate it, if it would be
18 helpful.

19 A. I think that from what I have been informed
20 upon, minorities go to Commissioner Holmes for help
21 whether they're in his precinct or not.

22 Q. Uh-huh. And that -- so do you have any -- any
23 belief as to whether other elected officials, other
24 than the county commissioners we already -- already
25 asked you about, do they -- do you have any belief that

1 -- and just in general, elected officials in Galveston
2 County have not been responsive to the needs of the
3 minority community? Is there any examples you can
4 provide, or do you believe --

5 A. That they're not -- that they haven't been
6 responsive?

7 Q. Yes, ma'am.

8 A. No. I -- I can't provide you with any examples
9 that they haven't been. I can just speak to the fact
10 that I know that minorities go directly to Commissioner
11 Holmes one way or another, even if they are not a part
12 of his precinct to get some type of guidance or advice
13 or whatever it is --

14 Q. Okay.

15 A. -- to get a solution.

16 Q. All right. So I just have -- there's one last
17 area of question. There's -- the -- the -- the
18 complaint filed in the case maintains that Commissioner
19 Holmes was not included, involve -- or involved in the
20 redistricting process in 2021.

21 A. Uh-huh.

22 Q. Do you -- do you believe that to be true?

23 A. That's what he stated.

24 Q. Okay. Yeah. That's what -- that was my next
25 question. You -- what's the basis for -- for that

EXHIBIT 11

*Excerpts of December 05, 2022 Deposition of
Roxy Hall Williamson*

HONORABLE TERRY PETTEWAY, ET AL. vs GALVESTON COUNTY, ET AL.
Roxy Hall Williamson on 12/05/2022

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HONORABLE TERRY PETTEWAY, ET AL. vs GALVESTON COUNTY, ET AL.
Roxy Hall Williamson on 12/05/2022

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HONORABLE TERRY PETTEWAY, ET AL. vs GALVESTON COUNTY, ET AL.
Roxy Hall Williamson on 12/05/2022

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12 ALSO PRESENT:

13 Mr. Sam Swain, Videographer
Ms. Kathryn Garrett (Appeared Via Zoom)
14 Mr. DaWuan Norwood (Appeared Via Zoom)
Ms. Alexandra Copper (Appeared Via Zoom)

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HONORABLE TERRY PETTEWAY, ET AL. vs GALVESTON COUNTY, ET AL.
Roxy Hall Williamson on 12/05/2022

1 A. I do my best, yes, ma'am.

2 Q. Do you know how often those meetings occur?

3 A. Monthly I believe.

4 Q. How often do you get a chance to participate?

5 A. Recently not as much as possible, but typically
6 every time I get an alert, I would Zoom in or be there in
7 person.

8 Q. Okay. So, you just mentioned your -- just
9 briefly your experience about speaking to voters about
10 redistricting issues. Can you describe some more about
11 your experience with redistricting issues in Galveston
12 County?

13 A. Yes, ma'am. Well, when I was first brought into
14 the -- I guess brought into the fold, that redistricting
15 was happening in Galveston County. It's something that --
16 like I said, I did a lot of work with my mother and her
17 black nurses group; and that was a group that was very
18 concerned because of the work that they do and because a
19 lot of the people that were really showing great concern
20 were the seniors in the precinct.

21 A lot of the resources, their backyard
22 barbecue that Commissioner Holmes would have for them once
23 a year in October just -- they were very concerned about
24 if those resources that they were accustomed to getting in
25 the precinct, would they change because of the maps; would

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1 any of that impair the activities that they were so
2 accustomed to having in the precincts and how would that
3 affect their polling places? That was a big concern as
4 well.

5 **Q. And this black nurses group, do the members**
6 **primarily reside in the former Precinct 3?**

7 A. Quite a bit of them do. Quite a bit of them do,
8 and they were very concerned with how the process would
9 affect just the different things that they're -- they were
10 accustomed to having. Like I said, their resources, would
11 that change; which community center they could use; would
12 that, you know, affect any of those kinds of things?

13 **Q. What sorts of resources were they concerned**
14 **about?**

15 A. Mainly -- I know for certain like my mother was
16 one of the ones that she uses the community center a lot,
17 from their bingo games to receiving groceries and that
18 kind of thing. So, they were, you know, concerned if they
19 would have to change community centers; or would they
20 still -- would the county still receive those resources
21 for them to get their groceries and, you know, their
22 rides. Like if they -- like my mother drives; but if she
23 were for whatever reason unable to drive to her community
24 center, they were offering bus services for them to get
25 there to take care of certain things.

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1 So, those, I guess, to other people wouldn't
2 seem so major; but to them those are major access points
3 for them to get whatever they needed from the County. And
4 Commissioner Holmes always made sure that they had these
5 things in place.

6 **Q. So, the black nurses group, they relied on**
7 **Stephen Holmes to provide those county resources?**

8 A. Well --

9 MR. HOLT: Objection -- objection, form.

10 **Q. (By Ms. Richardson) You may answer.**

11 A. Okay. I would say not so much him providing the
12 resources but he was definitely a touchstone. Even
13 people -- a couple of people that I spoke to that didn't
14 necessarily live in his precinct were concerned about his
15 precinct because if they were not able to contact their
16 commissioner, Commissioner Holmes' office was open to
17 everyone in the county, not necessarily just his people in
18 his precinct.

19 **Q. Can you describe any organizations you were**
20 **associated with during the redistricting process in**
21 **Galveston County?**

22 A. The NAACP, League of Women Voters. Trying to
23 think who else. Those are the two I primarily worked in
24 conjunction with.

25 **Q. And you mentioned being a fellow for SCSJ. Did**

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1 the county commissioners court.

2 **Q. Do you believe that minority voters currently**
3 **have representation on the commissioners court?**

4 A. With the current maps, no.

5 **Q. Why?**

6 A. Because as of that next commissioner's vote, it
7 would be very difficult with how things are set up now for
8 a candidate chosen by the people to be elected the way
9 that it's currently set up under the new maps just because
10 of how the population is meted out in the county.

11 **Q. Do you believe that minority voters had**
12 **representation on the commissioners court based on the**
13 **prior map?**

14 A. I do.

15 **Q. Who do you think represented the min- --**
16 **represented minority voters on the prior map?**

17 A. Initially it was Wayne Johnson. Now it's
18 Commissioner Stephen Holmes.

19 **Q. Why Commissioner Stephen Holmes?**

20 A. He's an advocate for the people. Like I said
21 before, he doesn't just answer to his constituents. He
22 answers for all of the residents in Galveston County, and
23 he does things like the backyard barbecue for the senior
24 citizens that they enjoy every October where he just sort
25 of gives them an opportunity to participate at one of the

1 local recreational centers. They dance. They have food.
2 They have music. My mom is one of his "Stevettes," which
3 they actually come together, some elderly ladies come
4 together. They line dance and they entertain the other
5 residents and they have a good time. And as far as I
6 know, there's no other commissioner that caters to his
7 residents and the constituents the way that Commissioner
8 Holmes does as well as speak on their behalf.

9 For example, when there was some concern
10 about the Confederate statues in Galveston County, he was
11 the only commissioner that actually spoke on behalf of the
12 people as far as wanting to have them removed.

13 **Q. Do you believe Commissioner Armstrong represents**
14 **the interests of minority voters in Galveston County?**

15 A. I do not.

16 **Q. Why not?**

17 A. Based on his self-proclaimed knowledge of how
18 things were happening during the COVID breakout [sic], he
19 was not representative of how the community felt the COVID
20 situation should have been handled.

21 **Q. Were you familiar with Commissioner Armstrong**
22 **before his appointment to the commissioners court?**

23 A. Vaguely. Only his stance on hydrochloroquine
24 [sic] during the COVID.

25 **Q. Have you had interactions with Dr. Armstrong in**

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1 your community work -- based work before his appointment
2 to the commissioners court?

3 A. I have not.

4 Q. Did you have any interactions with him regarding
5 the redistricting of the commissioners court?

6 A. No, ma'am.

7 MS. RICHARDSON: Let's see what time is it.
8 I think we're going to break for lunch in a second. Okay.
9 So, it's 11:55. So, we should break for lunch.

10 Q. (By Ms. Richardson) But just a couple more
11 questions before we head off to lunch if that's okay.

12 A. That's fine. Thank you.

13 Q. Ms. Williamson, you said you were taking a chemo
14 medication; is that correct?

15 A. I am.

16 Q. Can you describe why you're taking chemo
17 medication?

18 A. I am currently pushing through Stage 4 lung
19 cancer.

20 Q. How long have you been dealing with lung cancer?

21 A. I had emergency brain surgery in May. I received
22 my diagnosis in June.

23 Q. All righty.

24 MS. RICHARDSON: I think we can break.

25 THE VIDEOGRAPHER: All right. Off the

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1 county commission if you had a personal need?

2 MR. HOLT: Objection, form.

3 A. I don't. Other than the one commissioner, I
4 don't have a relationship with any of the other ones.

5 Q. (By Ms. Richardson) Why not?

6 MR. HOLT: Objection, form.

7 A. Unavailable. The one time that I did reach out,
8 they were unavailable; and I took my issue to the
9 commissioner that would respond.

10 Q. (By Ms. Richardson) What was the -- can you
11 describe the one time you reached out to a member of the
12 commissioners court?

13 THE WITNESS: (Coughing.) Excuse me.

14 A. I tried calling the office because there was
15 major flooding in a park near my house, and I was trying
16 to get more information about the park. I never received
17 a call back. I never received anything back. So, I just
18 took it to someone that I thought could answer my
19 question.

20 Q. (By Ms. Richardson) Who did you reach out to in
21 the commissioners court?

22 A. I actually spoke with the secretary of County
23 Commissioner Holmes, and she was able to answer my
24 question for me.

25 Q. But before that who did you reach out to on the

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1 commissioners court?

2 A. It would have been my representative, which I
3 think is Commissioner Giusti's office.

4 Q. What was Commissioner Giusti's response?

5 A. I didn't ever get a response.

6 Q. Have you attempted to reach out to Commissioner
7 Giusti since?

8 A. Not since then, no.

9 Q. Have you ever felt represented by Commissioner
10 Giusti?

11 MR. HOLT: Objection, form.

12 A. No.

13 Q. (By Ms. Richardson) Why have you never felt
14 represented?

15 MR. HOLT: Objection, form.

16 A. Things in Galveston County are very polarizing,
17 and I'm not a fan of our county Republican party.

18 Q. (By Ms. Richardson) Why not?

19 A. They don't seem to prioritize all of the
20 constituents, only a certain group of constituents.

21 Q. Which group of constituents are you referring to?

22 A. Primarily the --

23 MR. HOLT: Objection, form.

24 A. Primarily their white constituents.

25 Q. (By Ms. Richardson) Do you believe that Galveston

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1 County Republicans represent the interests of minority
2 residents in Galveston County?

3 MR. HOLT: Objection, form.

4 A. I do not.

5 Q. (By Ms. Richardson) Why not?

6 A. It's just apparent in how they handle things in
7 the county.

8 Q. Can you explain more by what you mean by "how
9 they handle things in the county"?

10 A. Primarily -- like I was speaking before about
11 the -- the moneys that were spent out of county that
12 primarily many constituents, not just the black and brown,
13 were against; and it seems to fall on deaf ears. They
14 sent the manpower and the money even against the will of
15 the people.

16 Q. Okay. I just have like one more -- one or two
17 more questions, and then I will close my direct.

18 Ms. Williamson, so, I can represent the
19 trial is scheduled next summer in 2023 more or less. We
20 don't have the exact date yet, but that's about the
21 approximate time that trial will be scheduled. Is it
22 possible that your medical condition will prevent you from
23 appearing in person in trial next year?

24 A. I'm praying that it doesn't. I'm doing
25 everything my doctors tell me to do. I hope to be here

EXHIBIT 12

*Excerpts of January 17, 2023 Deposition
of County Judge Mark Henry*

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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.

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8 Also Present:

DANIEL ALPIZAR (Videographer)

9 ALEXA PASTOR (Concierge)

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1 think your answer here was wrong other than the fact
2 that right now you can't recall it?

3 A. No, I can't recall it. And this would have
4 been probably input from Commissioner Clark.

5 Q. Okay.

6 MS. KLEIN: You can take it down.

7 Q. (BY MS. KLEIN) So you won again in 2014, 2018,
8 and then, congratulations, this past 2022, right?

9 A. Correct.

10 Q. And it's correct, then, in all of these
11 campaigns you identified as a Republican when you ran?

12 A. Right.

13 Q. So fair to say that you have identified as a
14 Republican your entire political career?

15 A. Entire life, yes.

16 Q. Entire life. Okay.

17 Turning to your 2018 campaign, was
18 Commissioner's Court redistricting part of your 2018
19 campaign platform?

20 A. No.

21 Q. Do you recall if you mentioned it in any of
22 your campaign events?

23 A. No.

24 Q. What about one-on-one conversations with
25 constituents?

1 A. Not that I recall.

2 Q. Any -- in any campaign material sent to voters?

3 A. No.

4 Q. So by my count, you've run in four Galveston
5 county-wide elections, right?

6 A. Yes, correct.

7 Q. Do you remember your margins of victory in
8 these elections?

9 A. 2010 was 60/40. Now, these are numbers that
10 may have been adjusted slightly after some mail-in
11 ballots, but for the most part 60/40 in 2010, 66/34 in
12 2022.

13 Q. 66, probably since COVID that kind of margin,
14 right?

15 A. I agree.

16 Q. Okay. Do you think that 66 percent from the
17 2022 election aligns with the partisan makeup of the
18 county?

19 A. Probably.

20 Q. Why do you think probably?

21 A. People had a choice. So I mean, I had an
22 opponent that ran as a Democrat so they had a choice and
23 they selected me.

24 Q. Who do you consider to be your core supporters
25 in the county when you run in county elections?

1 MR. RUSSO: Objection, vague and ambiguous.

2 THE WITNESS: People who don't want to pay
3 city taxes but want city services.

4 Q. (BY MS. KLEIN) Okay. What about income levels
5 on Bolivar Peninsula?

6 A. I would think they're -- I don't know. I would
7 think they're pretty respectable based on what it
8 probably costs to live there.

9 Q. So respectable you would mean on the high end?

10 A. On middle to upper, yes.

11 Q. What about Freddiesville?

12 MR. RUSSO: I'm sorry. What did you say?

13 THE WITNESS: Freddiesville, it's an
14 unincorporated part of Santa Fe.

15 I do not know much about the income level
16 of Freddiesville.

17 Q. What about Santa Fe?

18 A. Yes, very familiar with Santa Fe.

19 Q. What's the income level of that area?

20 MR. RUSSO: Objection, calls for
21 speculation.

22 THE WITNESS: I have no way of knowing.
23 But, I mean, based on the size of the lots there, again,
24 I'm going to assume that it's middle to upper.

25 Q. (BY MS. KLEIN) La Marque?

1 A. Yes.

2 Q. What's the income level of folks, to your
3 knowledge?

4 A. No idea.

5 Q. Texas City?

6 A. Same as somewhere else -- same as Galveston.
7 Parts of Texas City are probably economically depressed.
8 Parts of Texas City are very affluent.

9 Q. League City?

10 A. League City is a bedroom community, it's going
11 to generally be on the middle to upper end.

12 Q. And what about Dickinson?

13 A. Dickinson, same as Texas City, parts are going
14 to be somewhat more modest and somewhat -- some other
15 parts are going to be better off.

16 Q. What about the democratic -- demographic,
17 excuse me, makeup of these neighborhoods? Are you
18 familiar with the race or ethnicity that's predominant
19 in these different neighborhoods?

20 A. I mean, not specifically, no.

21 Q. What about generally?

22 A. Generally speaking, Santa Fe is probably going
23 to be mostly Caucasian, similar in League City. There's
24 going to be a higher African American population in
25 Hitchcock, La Marque, parts of Galveston, parts of Texas

1 City. Is that all you asked about? Does that cover
2 every place you asked about?

3 Q. Bolivar Peninsula?

4 A. Bolivar is going to be mostly White.

5 Q. Freddiesville?

6 A. Freddiesville -- Freddiesville is a place I
7 don't get too very often, so I don't know much about
8 Freddiesville.

9 Q. La Marque?

10 A. La Marque is probably more African American.

11 Q. And Dickinson?

12 A. Dickinson -- Dickinson is probably somewhat
13 half and a half. It's probably one of the more diverse
14 cities.

15 Q. I mean, you see demographic data as part of
16 your role as county judge, the presiding officer of the
17 county, right?

18 A. Honestly, I see it when we're doing
19 redistricting as it's presented to me and that's about
20 it.

21 Q. Okay. I would like to just pull up a document.
22 This is Tab 108. We're going to mark this as Exhibit 2,
23 I guess? 3. 2 was the deposition transcript.

24 (Exhibit No. 3 was marked.)

25 Q. (BY MS. KLEIN) So Judge, do you recognize this

1 that 1.8 million allocation?

2 A. I don't remember.

3 Q. Turning to another decision, in 2020 you
4 opposed the removal of a Confederate statue called the
5 Dignified Resignation that is in front of the Galveston
6 County Courthouse, correct?

7 A. The removal of the statue, probably, yes.

8 Q. Okay. You actually had previously voted to
9 renovate and rededicate that statue, correct?

10 A. Was that from 2011 or 2012?

11 Q. It was before 2020.

12 A. Okay. Then that would -- most likely, yes.

13 Q. And in 2020 Stephen Holmes, Commissioner
14 Holmes, proposed a vote to remove that Dignified
15 Resignation statue, correct?

16 A. I believe that's correct.

17 Q. Are you aware of whether any Galveston
18 residents were calling for its removal?

19 A. I do not remember.

20 Q. And do you remember whether that came up -- his
21 proposal for a vote was ever seconded?

22 A. I don't -- I don't think it was, but I don't
23 remember for sure.

24 Q. But there was never a vote on that issue,
25 right?

1 A. I don't remember. If it didn't get seconded,
2 there was no vote.

3 Q. Okay. Did anyone from the African American
4 community come before you to oppose or to advocate for
5 its removal, to your knowledge?

6 A. I don't remember.

7 Q. Do you think it should be removed?

8 A. The statute itself, no.

9 Q. Why not?

10 A. It's part of history. I mean, the plaque was
11 removed and placed in a museum, as I recall. But let me
12 go back to Commissioner Holmes for a minute.

13 Very unusual for this guy who's very smart
14 to not have a plan on what to do with the statue. He
15 just wanted it removed. No idea how to pay for it. No
16 idea where it is going. So that was kind of unusual for
17 Commissioner Holmes.

18 Q. Do you know why he wanted it removed?

19 A. No. I mean, you have to ask him.

20 Q. All right. Turning to language access, fair to
21 say there are folks that speak Spanish as a primary
22 language in Galveston?

23 A. Probably.

24 Q. Have you made any efforts to expand Spanish
25 language access to county information?

1 Calls for speculation.

2 THE WITNESS: I don't think there was a
3 vote on the map. Not that I remember.

4 Q. (BY MS. KLEIN) Would it surprise you if there
5 was a vote, you voted against it?

6 A. I'd need more details as to -- was it run
7 through the demographer? Do we know it was legally
8 compliant? Did it meet all the criteria we had set
9 forth? So I would want to know the answers to that
10 first.

11 Q. I'm hoping you can provide some of that
12 information.

13 A. Cannot.

14 Q. But you don't remember?

15 A. I do not.

16 Q. Okay. Let's talk a little bit about the
17 process. You just mentioned criteria. Did the
18 Commissioner's Court vote on criteria in the 2011 cycle?

19 A. I can't -- I think we did. I don't remember.

20 Q. The Commissioner's Court had voted on criteria
21 in previous cycles, to your knowledge?

22 A. I believe that to be correct, yes.

23 Q. And -- but you don't remember whether you voted
24 for criteria in a public meeting in the 2011 process?

25 A. I did everything that our legal counsel told us

1 them to her because then she's the voter registrar, she
2 has to implement those addresses into the -- I can't
3 remember the name of the system that then creates the
4 voter card that tells you where -- what precincts you're
5 in.

6 Q. Do you remember her asking -- all right. We
7 can take this one down.

8 Do you remember her following up in January
9 of the new year of 2021 about the same issue?

10 A. I don't remember that, but she may well have.

11 Q. Okay. We'll pull that up.

12 MS. KLEIN: This is Tab 26, Alexa, and it
13 will be Exhibit 15.

14 (Exhibit No. 15 was marked.)

15 Q. (BY MS. KLEIN) So this is an email dated
16 January 14, 2021 from Cheryl Johnson to you, correct?

17 A. Correct.

18 Q. And it also copies the other commissioners,
19 correct?

20 A. Yes, it does.

21 Q. Do you remember receiving this email?

22 A. I don't remember it, but I don't doubt that I
23 got it.

24 Q. And she says, (Reading:) With redistricting
25 around the corner, I thought it may be helpful for each

1 of you to have the list of registered voters across the
2 county (by precinct) which automatically provides county
3 commissioner lists and the JP/Constable listings.

4 Do you know why she would have sent that to
5 you?

6 A. Not really.

7 Q. Did you take any steps after receiving this
8 email from her?

9 A. There's nothing -- again, there's nothing at
10 this point that can be done. We don't have census data.
11 We don't have anything.

12 Q. Could you have started making a timeline for
13 how the redistricting process should go?

14 MR. RUSSO: Objection, calls for
15 speculation.

16 THE WITNESS: It would strictly be an
17 exercise because we don't have census data. So there's
18 nothing you can do until you get census data.

19 Q. (BY MS. KLEIN) Can you -- well, what about the
20 criteria that we just looked at a few exhibits ago? Do
21 you need census data to pass a resolution of criteria?

22 A. We didn't pass a resolution of criteria.

23 Q. But hypothetically, would you need census data
24 to pass a resolution of criteria?

25 MR. RUSSO: Objection, calls for

1 speculation and it's an incomplete hypothetical.

2 THE WITNESS: If our lawyers told us to
3 pass a resolution for criteria, we would have done that.

4 Q. (BY MS. KLEIN) Apart from what your lawyers
5 were telling you to do or not, your understanding, did
6 criteria require knowing anything about census data at
7 all?

8 MR. RUSSO: Calls for speculation and a
9 legal conclusion.

10 THE WITNESS: You lost me. The -- the
11 census data -- if we are going to adopt criteria, I
12 don't guess we'd have to wait for census data.

13 Q. (BY MS. KLEIN) You don't guess. You don't
14 think you would have had to wait?

15 MR. RUSSO: Objection, calls for
16 speculation.

17 THE WITNESS: I don't know that it would
18 have been passed by Commissioner's Court. So I can only
19 speak for myself as one of five members.

20 Q. (BY MS. KLEIN) What I'm asking is did -- if
21 you were to pass redistricting criteria as they had in
22 the past, would you need to know census numbers in order
23 to draft those criteria, those standards for
24 redistricting and pass them?

25 A. Probably not.

1 MR. RUSSO: Objection, calls for
2 speculation.

3 MS. KLEIN: If you could just let him --
4 not speak over each other somehow.

5 MR. RUSSO: She's telling you to wait for
6 me.

7 THE WITNESS: Okay.

8 Q. (BY MS. KLEIN) So you say you sought out Dale.
9 Do you remember receiving -- Dale Oldham, rather, do you
10 remember receiving communications from other perspective
11 counsel for redistricting?

12 A. I do not remember getting anything else.

13 Q. Okay. Let's pull one of those documents up.
14 This is Doc 15 and it will be Exhibit 16.

15 (Exhibit No. 16 was marked.)

16 MS. KLEIN: So Alexa, that's Tab 15.

17 Q. (BY MS. KLEIN) Just one more question on the
18 criteria issue. I'm sorry to go back and poke around.

19 A. That's okay.

20 Q. You said, "probably." I heard you say,
21 "probably." Is there any reason you can think of that
22 you would need census numbers first before drafting up a
23 set of criteria to guide the redistricting process?

24 MR. RUSSO: Object. Calls for speculation.
25 Misstates the record. It's vague and ambiguous.

1 THE WITNESS: No. I think -- you're saying
2 do I need census data if we are going to adopt criteria,
3 do we need to wait for census data, the answer to that,
4 I guess, would be no.

5 Q. (BY MS. KLEIN) All right. So we have this
6 document, Exhibit 16, pulled up. And this is an email
7 from Dianna Martinez to you dated February 18, 2020,
8 correct?

9 A. Correct.

10 Q. And Dianna Garza-Martinez is your office
11 coordinator, correct?

12 A. That is correct.

13 Q. Let's scroll to the second page. And this is a
14 letter attached, it says -- stamped with received
15 February 14, 2020. The heading is Allison, Bass &
16 Magee, LLP. The letter itself is dated February 6, 2020
17 and it is addressed to you, correct?

18 A. It is.

19 Q. Did I get any of that wrong?

20 A. You got it correct.

21 Q. And the subject line is, Commissioner's Court
22 Precinct Redistricting, right?

23 A. Correct.

24 Q. Do you remember getting this letter?

25 A. I specifically don't remember, but I'm sure I

1 saying who the attorneys that were proposed counsel
2 would be?

3 A. No, I don't remember.

4 Q. So let's scroll to -- again, back to Agenda
5 Item 11. Does it say anywhere on this?

6 A. No.

7 Q. So would a member of the public from these
8 public materials know who the proposed redistricting
9 counsel would be?

10 A. I wouldn't think so.

11 Q. Is there any other way they might know who
12 redistricting counsel would be?

13 MR. RUSSO: Objection, calls for
14 speculation.

15 THE WITNESS: I don't know.

16 Q. (BY MS. KLEIN) I mean, you know what
17 information is posted about the commissioner court
18 meeting you preside over before?

19 A. Right. And we're required to publish the item
20 to be considered, not the details of every transaction.

21 Q. But didn't you just say that you try to include
22 things whenever you can for the backup?

23 A. Yes.

24 Q. So do you know why you chose not to include the
25 draft?

1 of the regular meetings. Do you remember that?

2 A. Not really, but, okay, I'm sure it happened.

3 Q. You know, did you plan on having a similar
4 presentation about the census data, you know, maybe the
5 next September meeting, for example? At this time did
6 you make any plans like that saying, okay, the data is
7 going to be released in August so the first regular
8 meeting in September we'll have our presentation like we
9 did last cycle of census demographics for the county?

10 A. No, because we wouldn't have -- we wouldn't
11 have known for sure when to plan that. And we don't --
12 we don't put things on the agenda six months for now.
13 We put things on the agenda for next Monday.

14 Q. Okay. Well, let me ask you this. When the
15 data did come out in August, did you put that on the
16 agenda?

17 A. For what purpose? No. But I don't know what
18 purpose we would put it on the agenda for.

19 Q. To have a meeting to describe the census data
20 as you had, you know, last cycle in 2011, did you put
21 that on the agenda ever?

22 A. No.

23 Q. Do you remember why not?

24 A. No one asked me -- no attorney told me we
25 should do this.

1 Q. Did you make any announcement publicly -- not
2 in just a meeting, but did you make any public
3 announcement to Galveston residents about what the
4 census data had to say about Galveston?

5 A. I don't think so.

6 Q. Did you see any analysis of that census data
7 yourself?

8 A. When it first came out? No.

9 Q. What about later?

10 A. I suspect I would only have seen any
11 information relating to a proposed map is my guess.

12 Q. So other than counsel, did you see any summary
13 of the census data for Galveston?

14 A. No. Other than I did see the general
15 population, the total population.

16 Q. When did you see that?

17 A. Whenever that came out I saw it. I'm assuming
18 August or September.

19 Q. So turning back to Ms. Johnson, do you remember
20 her following up again with your office after the census
21 data was released?

22 A. I remember that she was asking for at least a
23 part-time personnel for input data. Other than that, I
24 don't recall anything else.

25 Q. All right. Let's pull up that document. It's

1 A. I'm sorry. Did I have any -- what was the
2 question?

3 Q. Concerns about how -- informing the public
4 about how redistricting would proceed?

5 A. We -- we informed the public. I mean, that's
6 all we can do.

7 Q. Well, did you inform them about what the census
8 had said about Galveston?

9 A. I don't think so.

10 Q. Did you inform them that maps were being
11 drafted by counsel?

12 A. Sure, they would have known that. I mean, you
13 have to understand that very few people show up to
14 Commissioner's Court. So when you say the constituents,
15 I'm not really sure who you're talking about. The
16 people who live here or the people who show up or all of
17 them?

18 Q. I'm talking about the people in -- who live in
19 Galveston County when I say constituents.

20 A. Okay.

21 Q. So the people you represent in government.

22 A. Right.

23 Q. Did you -- how would they have known that maps
24 were being drafted?

25 MR. RUSSO: Object. Calls for speculation.

1 THE WITNESS: Other than to access our
2 agendas and they can also get put on a list to always
3 get our agendas, that would have been it.

4 Q. (BY MS. KLEIN) Which agenda would that have
5 been on?

6 A. Engagement letter back in whenever that was.

7 Q. The engagement letter -- I mean, as we talked
8 about before, the engagement letter wasn't included in
9 the backup, right?

10 A. It did not say who the firm was. I did say
11 that we engaged -- that we engaged a firm, through, for
12 redistricting.

13 Q. But did it have any information about when
14 draft maps would start being drafted?

15 A. No.

16 Q. Did it have any information about how many maps
17 would be drafted for proposal?

18 A. I don't think so.

19 Q. What about any information about a timeline for
20 drafting?

21 A. We wouldn't have been able to provide a
22 timeline at that time.

23 Q. Did it disclose to them that it would have to
24 be done by mid November?

25 A. I don't think so.

1 you didn't?

2 A. After -- as long as -- to me, as long as we
3 joined Bolivar, Galveston, and that's really it, then
4 the rest of the lines are not that important.

5 Q. And we'll get into this more later. But that
6 concept of having a coastal precinct, did you share any
7 other -- strike that.

8 Did you have at the beginning of this
9 redistricting process in August any other conceptual
10 preferences other than this coastal precinct?

11 A. Not really.

12 MS. KLEIN: Okay. This is a good time for
13 us to stop if folks want to get lunch.

14 MR. RUSSO: No worries.

15 VIDEOGRAPHER: The time is 12:35. Off the
16 record.

17 (Brief recess.)

18 VIDEOGRAPHER: The time is 1:36. Back on
19 the record.

20 Q. (BY MS. KLEIN) Judge Henry, other than the
21 issue of the privilege with your -- with your counsel,
22 did you discuss your testimony here today with anybody
23 else?

24 A. No.

25 Q. Did you talk about issues unrelated to

1 Q. (Reading:) Please submit your support for
2 proposed map 2. This map creates a much needed coastal
3 precinct. Having a coastal precinct will ensure that
4 those residents directly along the coast have a
5 dedicated advocate on Commissioners Court.

6 So is it fair to say that by October 29th
7 you had decided you're going to vote for Map 2?

8 A. Having had -- having no reason not to,
9 probably.

10 Q. What do you mean, "no reason not to"?

11 A. In short of someone coming in and saying, hey,
12 it turns out that Map 2 is out of population deviation,
13 it's got a problem with something, some other problem,
14 then, yes.

15 Q. Sorry. I'm just trying to eliminate questions
16 we might have already covered. If you'll give me a
17 moment.

18 A. Okay. That's fine.

19 Q. So is it true that the first time a quorum of
20 commissioners met in the same room to discuss the draft
21 maps was the November 12, 2021 hearing?

22 A. I believe that would be correct, yes.

23 Q. Is there any other possibility you can think of
24 other than that hearing beforehand?

25 A. No, I don't think so.

1 Q. And you had taken great care to make sure that
2 that was the first time everybody met to discuss the
3 maps together, right?

4 A. Correct. We would not have been able to meet
5 short of a posted meeting.

6 Q. Are you aware of whether any other commissioner
7 prepared a proposed map that was not posted on this
8 website?

9 A. At the November 12th meeting Commissioner
10 Holmes introduced two maps that we saw -- all saw for
11 the first time there.

12 Q. And when did you learn that Commissioner Holmes
13 would have his own proposal?

14 A. When he stood up and introduced it.

15 Q. Are you -- do you know why that wasn't one of
16 the drafts that Dale had put together in the beginning?

17 A. I do not know.

18 Q. Do you remember that Commissioner Holmes also
19 passed out an RPV study at that November 12th hearing?

20 MR. RUSSO: Objection, calls for
21 speculation. Vague and ambiguous.

22 MS. KLEIN: I will --

23 MR. RUSSO: At least ask him what that is.

24 Q. (BY MS. KLEIN) I'll clarify. Are you aware of
25 what racially polaris voting study is?

1 A. I don't remember that. He may have, but I
2 don't remember that.

3 Q. Scroll to the next page. This is a document
4 titled November 8, 2021. And the third paragraph says,
5 (Reading:) Voting patterns in Galveston County are
6 definitely characterized by racially polarized voting.

7 So you don't -- your testimony is that you
8 don't know what that means?

9 A. I do not recall having heard RVP -- or RPV
10 before today.

11 Q. What about racially polarized voting?

12 A. No, I don't think so.

13 Q. And did you ever view a racially polarized
14 voting study? Do you ever recall reviewing a study at
15 any point in the 2021 process?

16 A. No.

17 Q. Okay. Let's go to the conclusions. The third
18 sentence starts, (Reading:) In recent elections which I
19 analyzed -- sorry, back up. Do you know what, strike
20 that.

21 I'd like to talk a little bit more about
22 your decision to choose Map 2. You were aware -- is it
23 fair to say you were aware when you decided on Map 2
24 that it would create a dramatic shift in the
25 commissioner precinct boundary that existed at the time?

1 A. Yes. But that would be the nature of making
2 one precinct cover the coast.

3 Q. And you were aware, right, when you chose Map 2
4 that it would take that then existing Precinct 3 and it
5 would split it into all of the four new precincts,
6 correct?

7 A. I may have known that at the time. I don't
8 know.

9 Q. Didn't you -- wouldn't you have looked -- let
10 me ask you this. Didn't you look at the existing
11 precinct lines during the process to see where -- where
12 you were starting from?

13 A. Well, I would have known what the existing
14 precinct lines were. I mean, I know that Dale ensured
15 that everybody lived in the new precincts regardless of
16 which map it was. I think they all lived in the
17 precincts of either map.

18 Q. So you can see that the existing Precinct 3 it
19 was in the middle of the county, right?

20 A. Yes.

21 Q. And then in the new Map 2 it got moved to the
22 north part of the county, right?

23 A. Yes.

24 Q. And all of the other precincts m1, 2, and 4 had
25 a chunk of that middle part of the county, right?

1 these were shown to me.

2 Q. What about a new -- did you ever ask -- so you
3 never asked for a map other than this one?

4 A. The 2.

5 Q. For Map Proposal 2, you liked this when you saw
6 it, right?

7 A. I liked the fact that it got us one coastal
8 precinct.

9 Q. But you liked -- you didn't -- you didn't ask
10 for the other lines to change. You must have been --
11 you must have liked the other maps, right? Sorry. You
12 didn't ask for the other precinct lines to change. You
13 must have liked -- been satisfied at least with where
14 the other precinct lines were, right?

15 A. Again, the precinct lines are far more
16 important to the precinct commissioners than they are to
17 me.

18 Q. But to answer my question, you must have at
19 least been satisfied with them if you --

20 A. As long as they said that they complied with
21 the population -- population adjustment and all the
22 state and federal laws, that was fine.

23 Q. You were aware from the 2011 litigation,
24 weren't you, that Precinct 3 was the only
25 majority/minority district in the whole county, right?

1 A. Yes.

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

4 Go ahead.

5 Q. (BY MS. KLEIN) And your answer is yes?

6 A. My answer is I was probably told that, yes.

7 Q. And you had even seen -- we talked about that
8 preclearance letter, you know, with the preclearance
9 letter had those tables. You had seen those, right?

10 A. Back in 2011?

11 Q. At some time before the 2021 process you had
12 seen that preclearance letter with those --

13 A. Back in 2011, yeah.

14 Q. Okay. All right. Did you ever use an
15 interactive version of this map?

16 A. No.

17 Q. Going onto this website, scroll again, I want
18 you to tell me if you see any kind of data about the
19 maps posted.

20 A. The boundaries and the precinct number.

21 Q. So the benchmark map, the preexisting map, that
22 wasn't on here, right?

23 A. I don't know what a benchmark map is.

24 Q. When I say benchmark I mean the map that was in
25 place in 2012 to 2021 until this map, the new one was

1 passed.

2 A. Oh, okay.

3 Q. So that old map from 2012 to 2021, that's not
4 on this website, right?

5 A. It appears so.

6 Q. What would be somebody have to do if they
7 wanted to see that during the redistricting process?

8 MR. RUSSO: Objection, calls for
9 speculation.

10 THE WITNESS: The engineering website.

11 Q. (BY MS. KLEIN) What is the engineering
12 website?

13 A. The county's main website. They have all the
14 maps there. They have everything.

15 Q. Is there a link to that on this website?

16 A. Can you show me the URL?

17 Q. Then keep scrolling down maybe.

18 A. Yeah. You just remove the -- from the slash
19 County judge redistricting on, that will get you to -- I
20 think that gets you to the map section of engineering.

21 Q. Were there any instructions on this website
22 about how to do that?

23 A. I don't see any.

24 Q. Okay. So what about an explanation of US
25 Census data results for Galveston? Is there any

1 explanation of census data results on this web page?

2 A. I don't see any.

3 Q. So if somebody wanted to see, you know, what
4 had changed since the 2010 census or even just what the
5 numbers were, what would they have to do?

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

8 THE WITNESS: I assume go to the Census
9 Bureau's website.

10 Q. (BY MS. KLEIN) They couldn't get that from the
11 county, right?

12 A. I do not know if ever we put that on our
13 website, but it was on the Census Bureau's website.

14 Q. And there's no breakdown for each of these
15 maps of -- can you scroll back up. There's no breakdown
16 of the deviations or, you know, how many people are in
17 each of these precincts on these maps, right?

18 A. I don't see that.

19 Q. There's no racial demographic breakdown of
20 these maps?

21 A. I don't see it.

22 Q. And there's no partisan information?

23 A. I think there's some.

24 Q. Okay. Any other analytics on this website
25 about these maps other than the pictures?

1 A. Doesn't look like it.

2 Q. So let's go back to the specific criteria that
3 you were actually -- if any that you were using when you
4 were deciding which map to -- which maps should be
5 drawn.

6 So you mentioned this coastal precinct
7 equalizing populations, I've understood, and then a
8 general, like, legally compliant, right? Were there any
9 other specific criteria that you were thinking about
10 when you were giving input on what the proposed map
11 should look like?

12 A. No.

13 Q. What about the other commissioners, do you know
14 what criteria they might have had in mind when they were
15 providing feedback about what the proposed map should
16 look like?

17 A. No. Other than like I said, Commissioner Apfel
18 had asked that a street he moved over for a house that
19 either he owned or was buying or something like that.
20 Other than that, I would not have known any other
21 commissioners' requests, if they even had any.

22 Q. All right. I would like to go to another
23 exhibit. But actually, if you would like to take a
24 break, this is an okay time to stop.

25 A. I'm fine.

1 to have been true for the other commissioners?

2 A. Do not know.

3 Q. And then the goal was to have -- the last
4 sentence says, (Reading:) There was a sense that the
5 prior map looked gerrymandered.

6 Do you agree with that statement?

7 A. I do.

8 Q. What does "gerrymandered" mean to you?

9 A. Moving lines in a -- in not necessarily in a
10 sensible manner in order to achieve a specific goal.

11 Q. And which part of the prior map looked
12 gerrymandered?

13 A. Precinct 3. And I understand it had to be
14 so...

15 Q. What do you mean it had to be?

16 A. My understanding from the 2011 redistricting is
17 we had to make every effort to keep a majority/minority
18 precinct. And the only way we could achieve that was to
19 have the precinct look like it did.

20 Q. So you knew that by changing things the way you
21 did in Map Proposal 2 you were getting rid of that
22 majority/minority precinct, right?

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

25 THE WITNESS: And what I know would have

1 really affect me.

2 Q. Was preserving the prior district lines
3 considered among potential criteria among this list at
4 any point?

5 A. I didn't see it in there.

6 Q. Do you know if it was ever considered?

7 A. No, I do not.

8 Q. Okay. So we see your signature at the end of
9 this. Do you know if the other commissioners reviewed
10 this before it was submitted?

11 A. I do not know.

12 Q. Did you talk to them about it to make sure this
13 was accurate to them before you signed it?

14 A. Can't do that.

15 Q. Even one on one?

16 A. One on one but only one commissioner. The next
17 time I talk to another commissioner, I'm in violation of
18 the state law.

19 Q. Did you have your staff confirm with them?

20 A. No.

21 Q. Okay. So just you signed this and you didn't
22 ever talk about it with another commissioner in any way?

23 A. I did not.

24 Q. So how do you know -- so going back up to the
25 top, the way -- if we could go back up to the top of

1 Interrogatory 1. It says -- sorry, the Interrogatory
2 No. -- the Supplemental Response.

3 MS. KLEIN: Sorry, Alexa, just a little bit
4 further down. Thank you.

5 Q. (BY MS. KLEIN) (Reading:) Defendants state
6 that the Galveston County Commissioners Court considered
7 the following factors in adopting the 2021 redistricting
8 plan.

9 If you never talked about this with the
10 other commissioners, how do you know that that statement
11 is true and accurate?

12 A. That would be a question that I think that the
13 lawyers would have posed to other commissioners.

14 Q. But you -- when you signed this document, you
15 didn't know whether that was true, right?

16 A. Whether what is true, that if the lawyers
17 talked to them?

18 Q. No. That the Galveston County Commissioner's
19 Court considered these factors.

20 MR. RUSSO: Counsel, are you taking issue
21 with the lawyers preparing the response on behalf of the
22 County?

23 MS. KLEIN: No. I'm --

24 MR. RUSSO: -- because that's what
25 happened.

1 MS. KLEIN: I'm asking how he knew it was
2 true that the Commissioner's Court considered these
3 criteria if he never was able to confirm that.

4 MR. RUSSO: You know that he's got to rely
5 on counsel's discussions with other folks. There's
6 one -- he's one person that's verifying the responses.
7 This is a ridiculous line of questioning.

8 Q. (BY MS. KLEIN) I'm just -- I'm going to go
9 through and X out things that we've already covered if
10 you'll give me a little bit -- a moment.

11 A. Yeah, sure.

12 Q. So fair to say you never discussed these six
13 listed criteria with the other commissioners directly?

14 A. I may have discussed them with one. But
15 certainly not more than one.

16 Q. Did you apply these criteria when you were
17 providing input on draft maps as they're stated here?

18 A. The first one, absolutely, and then after that
19 the coastal precinct was the only other factor that I
20 would have said.

21 Q. Let's -- I'm going to follow up on that voting
22 precinct issue and then we'll move on.

23 MS. KLEIN: Alexa, could you -- can you
24 scroll down to Interrogatory No. 2, please? Try to be
25 quick about this.

1 A. Based on only the 2022 general election
2 results, 34 percent.

3 Q. How many -- so did you view, you know, partisan
4 breakdown by new Map 2 districts, commissioners'
5 districts before you chose Map 2?

6 A. I'm sure the commissioners did, but I don't
7 think I did.

8 Q. So you -- you didn't look at data related to
9 this before you voted on the map?

10 A. If I did, I don't remember it. And again,
11 that's a commissioner -- far more important to the
12 commissioner than it is to me.

13 Q. And when you say that Map 2 reflects the
14 partisan composition of Galveston County, you said that
15 makes sense to you, and why does that make sense to you?

16 A. I don't think that I said Map -- well, I guess
17 it does say Map 2. If you've got a 66 percent
18 Republican county, it's going to be very hard to draw a
19 map that doesn't have four Republican precinct
20 commissioners.

21 Q. So you believe that Map Proposal 2 has all four
22 Republican commissioner precincts, right?

23 A. Not at the moment but I suspect it will get
24 there eventually.

25 Q. What do you mean by "eventually"?

1 A. Well, if it's -- if it -- if it stays the way
2 it is, it would appear that would elect four Republican
3 commissioners, yes.

4 Q. So if Map -- just so I understand you
5 correctly. If the enacted map from 2021 stays in place,
6 it will elect all four Republican commissioners, right?

7 A. I believe so, yes.

8 Q. And so that, you know, 30 percent of Democrats,
9 they're not going to have a Democratic commissioner on
10 the commission anymore, right?

11 A. Well, they would be dispersed county-wide.
12 They would not be in any one location.

13 Q. So no?

14 A. No.

15 Q. Going back to your -- just thinking, going back
16 to your slogan, you know, "Keep Galveston County Red," I
17 mean, is that one of the reasons that you like this map,
18 it would help keep Galveston County red?

19 A. No. I already had that with three
20 commissioners.

21 Q. And you didn't think, you know, sealing the
22 deal would further that objective of keep Galveston
23 County red?

24 MR. RUSSO: Objection, vague and ambiguous.

25 THE WITNESS: It's not necessary. It's

1 A. Do I remember doing that specifically, no. But
2 my belief is I probably would have done that. That's
3 something I would have done.

4 Q. And where would you have done that? You
5 mentioned Facebook and we saw that Facebook post
6 earlier. Is there anywhere else?

7 A. We have a Twitter feed that I have never even
8 seen before. Facebook, Twitter is probably going to be
9 the primary possibilities.

10 Q. To your knowledge, was there any instruction to
11 the public about when they had to post a public comment
12 by for it to be read by the Commissioner's Court?

13 A. I don't remember. If it's not on here, I don't
14 remember.

15 Q. And any public comments that came in, what
16 happened to them after they were submitted?

17 A. They were collected, compiled, and sorted by
18 probably Jed at that time.

19 Q. Did you review the comments that were
20 submitted?

21 A. I reviewed a few. But they -- they were --
22 they were significant. There were a lot of them. And
23 then I got the final tally at the end.

24 Q. When you say "a few," can you estimate about
25 how many?

1 A. Less than a dozen.

2 Q. How did you choose which ones you were going to
3 review?

4 A. Honestly, it's when I sat down at that time,
5 whatever the next ones to come flowing in, that's how.

6 Q. And they were sent to your email directly or
7 somebody compiled them and sent them to you?

8 A. They would have been forwarded on.

9 Q. From -- by whom?

10 A. It may have been automatic. But if not, it
11 would have been either Jed or Zach.

12 Q. Do you know how many comments your office had
13 received by the time you had issued notice of the
14 November 12, 2021 special meeting?

15 A. I knew at the time. It seems like it was 500
16 or 515, in that ballpark.

17 Q. What about -- strike that.

18 You -- so you mentioned you received an
19 overall breakdown. And do you recall that you shared
20 that breakdown during the November 12, 2021 hearing?

21 A. I did.

22 Q. Do you remember the breakdown?

23 A. Exactly, no. As I recall, it was about two to
24 one favoring Map 2.

25 Q. And you -- do you remember saying in a hearing

1 that there were people that did not choose a map
2 preference; they just called you names? Do you remember
3 that?

4 A. Yes, that happens.

5 Q. What were you referring to -- and I'm so sorry
6 about that.

7 A. That's --

8 Q. What were you referring to when you said that?

9 A. There are people who don't really care which
10 map it is. They just want to take shots. And that's
11 what they do and that's fine. That's -- that's part of
12 the job.

13 Q. How did you -- were those within, like, the
14 dozen or so that you read?

15 A. Yeah.

16 Q. How did you know that they --

17 A. My staff would have told me. The ones that I
18 have read were actually somewhat relevant.

19 Q. Well, tell me about the ones you read.

20 A. I just remember them saying we like the coastal
21 county or we, you know, like Map 1 or you know -- but
22 they were generally, you know, related to the maps.

23 Q. Did any of them -- the ones that you actually
24 read, did they change any of your opinions on how you
25 would vote on the map?

1 Q. (BY MS. KLEIN) So the top email here is -- it
2 looks -- you know, the from is a little convoluted here,
3 but it says Liechty.

4 A. Linda Liechty.

5 Q. And then two, Dianna Martinez and Veronica Van
6 Horn. This is your staff, right?

7 A. Correct.

8 Q. And it says, (Reading:) JH and Tyler talked
9 this morning. Need to schedule a special meeting on
10 Tuesday, November 9th. It's the only day Commissioner
11 Clark is available. Judge McCumber's courtroom is
12 available all day, but JH prefers we do it in the
13 morning. It's about the meeting -- it's about meeting
14 that 11/13 deadline.

15 JH, is that Judge Henry?

16 A. Yes, ma'am.

17 Q. And can you tell me about the context of this
18 email being sent?

19 A. Okay. I was off by a few days. So apparently,
20 it was on November 3rd they called and said you have to
21 have it to us by the 13th. So on the 3rd we would have
22 jumped on trying to get this wrapped up.

23 So apparently, we made an attempt to get it
24 done on November 9th, and for reasons I'm guessing, you
25 know, but I can't remember, we had to switch it to the

1 12th.

2 Q. I actually don't know. Do you remember why?

3 A. No, I don't. I don't know what day of the week
4 the 9th was. Was that a -- if the 12th was a Friday.
5 It would have been a Tuesday. It might be that we
6 couldn't get a forum. There's nothing that tells me we
7 couldn't do it on the 9th. We clearly wanted to and
8 tried to get the 9th.

9 Q. What was the date you were planning on having
10 the vote before you were informed that it had to be done
11 by the 13th?

12 A. I don't think we had a specific date in mind
13 yet. We were -- I mean, we still had it out for input.

14 Q. So in early November you didn't have a date for
15 legislative action that you wanted to get done before
16 mid to late November; is that correct?

17 A. By mid to late November, yes,

18 Q. You knew -- you know, going back to our
19 conversation at the beginning of the day, because that
20 regular session is usually the first Monday of the
21 month, you knew all the time that it would have to be a
22 special meeting, right, for this vote to happen?

23 A. Not necessarily. It could have happened during
24 a regular session. But the regular session would have
25 likely been the 1st, 2nd, 3rd, 4th, 5th, in that

1 THE WITNESS: The notice from the state
2 saying you must have your files to us by the 13th.

3 Q. (BY MS. KLEIN) What was your understanding of
4 the deadline before that?

5 A. I don't know if I had an understanding of a
6 deadline before that other than my preference that it be
7 before candidate filing period opening.

8 Q. And what was -- and your preference for
9 candidate filing, what preference -- what preferred date
10 was that?

11 MR. RUSSO: Objection, asked and answered.

12 THE WITNESS: We -- whatever the date the
13 opening of the filing period was. I don't recall what
14 it was.

15 Q. (BY MS. KLEIN) So had you planned ahead you
16 were going to have more than one meeting before that
17 preferred deadline?

18 A. No way of knowing. If we could have gotten it
19 done in one meeting, there's no reason to have
20 additional meetings necessarily.

21 Q. So come November -- come October 29th, when you
22 posted on that website the proposed maps, you had no
23 plans for when you were going to hold the hearing or how
24 many hearings there would be. Is that your testimony?

25 A. Say it again.

1 Q. When you posted the maps on October 29th on the
2 website, you had no understanding of when you would have
3 a hearing on it or whether there would be more than one
4 hearing. Is that your testimony?

5 A. We had no idea that the deadline would get
6 moved to the 13th. That is correct. So, therefore, we
7 did not feel like we were in a time-sensitive situation
8 at that time.

9 Q. Even though the candidate deadline filing
10 starts mid to late -- your understanding was it started
11 mid to late November?

12 A. Which is three weeks away.

13 Q. So at that time you had no plans for how many
14 meetings you've had or when they -- those meetings would
15 occur?

16 MR. RUSSO: Objection, asked and answered.

17 THE WITNESS: And again, if we schedule a
18 meeting in three days, that's all it takes.

19 Q. (BY MS. KLEIN) Okay. Do you remember how many
20 people commented during the November 12th hearing?

21 A. I do not.

22 Q. Do you remember the people who commented how
23 many opposed Map 2?

24 A. I do not.

25 Q. Did anything -- any of the comments you heard

1 THE WITNESS: Yes, because as I've
2 mentioned, commissioners have specific peculiar lines
3 they want in certain places and I'm county-wide so I
4 don't have those same concerns.

5 Q. (BY MS. RICHARDSON) You testified earlier that
6 you already knew that you were voting for Map 2 before
7 the November 12th meeting. Do I recall that testimony
8 correctly?

9 A. I would have probably said something along the
10 lines of since that got my coastal precinct that I had
11 requested, all other things being equal and being
12 compliant, that would be my preference, yes.

13 Q. Was there any consideration of Map 1 before
14 the -- did you personally consider Map 1 as a viable
15 option?

16 A. Sure, I looked at it. Absolutely.

17 Q. When did you decide that --

18 MR. RUSSO: Finish your question, counsel.

19 THE WITNESS: Sorry, counsel.

20 MS. RICHARDSON: That's fine. I basically
21 finished. He answered it.

22 Q. (BY MS. RICHARDSON) When did you decide that
23 you preferred Map 2 over Map 1?

24 A. Again, because of the coastal precinct and if I
25 had seen that everything else was in balance and the

EXHIBIT 13

*Galveston County's Pre-Clearance
Submission Letter to the U.S.
Department of Justice Chief, Voting
Rights Section, dated October 14, 2011*

BEIRNE, MAYNARD & PARSONS, L.L.P.

401 W. 15TH STREET
SUITE 845
AUSTIN, TEXAS 78701

JAMES E. "TREY" TRAINOR, III

(512) 623-6700
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DIRECT DIAL (512) 8623-6753
EMAIL: TTRAINOR@BMPLLP.COM

October 14, 2011

Chief, Voting Section
Civil Rights Division
Room 7254-NWB
U.S. Department of Justice
950 Pennsylvania Ave., NW
Washington, D.C. 20530

Re: Submission under Section 5, Voting Rights Act of 2011 redistricting of commissioner precincts for Galveston County, Texas and request for expedited consideration

Dear Voting Section:

On behalf of Galveston County, Texas (hereinafter, "County"), I hereby submit the following changes affecting voting for consideration pursuant to 42 U.S.C. §1973(c).

Galveston County seeks preclearance of its August 30, 2011 Order adopting changes to the boundaries of its commissioner precincts.¹

The changes to the commissioner precincts were a result of population changes identified in the 2010 Census.

Galveston County respectfully requests expedited consideration of this submission pursuant to 28 C.F.R. §51.34 for preclearance by November 12, 2011, the first date on which candidates may apply for a place on a Republican or Democrat primary ballot. December 12, 2011 will conclude the period within which candidates may file an application for a place on the primary ballot.

In compliance with 28 C.F.R. Part 51, I am supplying the following information, or reference to the relevant attachment where the information is located, on behalf of the County:

¹ Not to be confused with a voting precinct, a district used for electing a commissioner, justice of the peace and constable is called a "precinct" in Texas.

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Section 51.27

- (a) **A copy of any ordinance, enactment, order or regulation embodying a change affecting voting.**

A copy of the Galveston County Commissioners Court Order adopting the boundary changes for its commissioner precincts is attached to this submission as Exhibit "A."

- (b) **A copy of any ordinance, enactment, order, or regulation embodying the vote practice that is proposed to be repealed, amended, or otherwise changed.**

A copy of the Galveston County Commissioners Court Order adopting the existing commissioner precincts is attached to this submission as Exhibit "B."

- (c) **If the change affecting voting is not readily apparent on the face of the documents provided under paragraph (a) and (b) of this section or is not embodied in a document, a clear statement of the change explaining the difference between the submitted change and the prior law or practice, or explanatory materials adequate to disclose to the Attorney General the difference between the prior and proposed situation with respect to voting.**

The change alters the boundaries of the commissioner precincts. The Plan makes changes to the boundaries of all four County Commissioner districts. The difference in population and demographics between the newly adopted and current precincts is shown in the following charts.

A map showing the new precincts is attached as Exhibit "C," and a map of the prior precincts is attached as Exhibit "D." The Plan makes changes to the boundaries of all four County Commissioner districts. Additionally, both maps are submitted in .dbf format on the enclosed disk.

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Existing Districts Total Population

District	Persons	Deviation	Hispanic % of Total Population	Non-Hispanic Anglo % of Total Population	Non-Hispanic Black % of Total Population	Non-Hispanic Asian % of Total Population	Non-Hispanic Other % of Total Population
1	61,152	-16.03%	28.70	55.80	10.76	2.72	0.14
2	76,684	5.30%	20.05	67.51	7.83	2.69	0.09
3	63,534	-12.76%	29.51	32.56	35.27	0.87	0.19
4	89,939	23.50%	15.12	73.46	4.72	4.71	0.18
Totals	291,309						

2011 Adopted Districts Total Population

District	Persons	Deviation	Hispanic % of Total Population	Non-Hispanic Anglo % of Total Population	Non-Hispanic Black % of Total Population	Non-Hispanic Asian % of Total Population	Non-Hispanic Other % of Total Population
1	71,814	-1.39%	23.02	63.42	9.13	2.62	0.15
2	72,956	0.18%	17.62	70.21	7.41	2.80	0.09
3	74,679	2.54%	31.53	33.54	31.36	1.67	0.15
4	71,860	-1.33%	17.17	70.74	5.35	4.66	0.19
Totals	291,309						

Existing Districts Voting Age Population

District	Total VAP	Hispanic % of Total VAP	Non-Hispanic Anglo % of Total VAP	Non-Hispanic Black % of Total VAP	Non-Hispanic Asian % of Total VAP	Non-Hispanic Other % of Total VAP
1	47,404	24.93	60.09	10.34	2.85	0.14
2	57,818	17.62	70.90	7.28	2.69	0.08
3	46,487	25.68	36.95	35.01	0.94	0.15
4	65,433	13.31	75.81	4.64	4.71	0.16
Totals	217,142					

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2011 Adopted Districts Voting Age Population

District	Total VAP	Hispanic % of Total VAP	Non- Hispanic Anglo % of Total VAP	Non- Hispanic Black % of Total VAP	Non- Hispanic Asian % of Total VAP	Non- Hispanic Other % of Total VAP
1	53,365	19.72	67.48	8.61	2.68	0.13
2	55,108	15.38	73.52	6.76	2.78	0.08
3	56,976	27.78	38.18	30.60	1.87	0.14
4	51,693	15.14	73.46	5.16	4.64	0.17
Totals	217,142					

- (d) **The name, title, address and telephone number of the person making the submission.**

The person making the submission is Mr. James E. "Trey" Trainor, III at the law firm of Beirne, Maynard & Parsons, L.L.P., 401 W. 15th Street, Suite 845, Austin, Texas 78701, phone (512) 623-6700 and fax (512) 623-6701

- (e) **The name of the submitting authority and the name of the jurisdiction responsible for the change, if different.**

The name of the submitting authority is Galveston County, Texas

- (f) **If the submission is not from a State or county, the name of the county and State in which the submitting authority is located.**

Not applicable

- (g) **Identification of the person or body responsible for making the change and the mode of decision (e.g., act of State legislature, ordinance of city council, administrative decision by registrar).**

The changes to the commissioner precincts were adopted by the Galveston County Commissioners Court by Order dated August 30, 2011.

- (h) **A statement identifying the statutory or other authority under which the jurisdiction undertakes the change and a description of the procedures the jurisdiction was required to follow in deciding to undertake the change.**

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The proposed changes to the commissioner precincts boundaries are made pursuant to Texas Constitution Article 5, §18(b). Each county is divided into four commissioners precincts, in each of which are elected, by the qualified voters of the county, one county commissioner who holds office for four years. The commissioners court exercises certain powers and jurisdiction over county business under the Texas Constitution and various state laws.

A county commissioners court, which is assigned certain tasks that would normally be considered legislative in nature, and which performs certain executive or administrative functions for the county that affect all citizens of the county, is a unit of local government subject to restriction against substantial variation from equal population. *Avery v. Midland County, Texas*, 390 US 474 (1968).

(i) The date of adoption of the change affecting voting.

The changes to commissioner precincts were adopted by the Commissioners Court of Galveston County, Texas by Order dated August 30, 2011.

(j) The date on which the change is to take effect.

The order is effective on the later of January 1, 2012 or when preclearance is obtained.

(k) A statement that the change has not yet been enforced or administered, or an explanation of why such statement cannot be made.

The change has not yet been enforced or administered.

(l) Where the change will affect less than the entire jurisdiction, an explanation of the scope of the change.

The change affects the entire jurisdiction of Galveston County, Texas.

(m) A statement of the reasons for the change.

The proposed changes in county commissioner precincts were necessitated by population shifts disclosed by the 2010 Census. Based on the County's population of 291,309, commissioner precincts with perfectly equalized population would each contain 72,827 people (one would necessarily contain 72,828 due to the odd number of total people).

Due to the population changes over the past decade, the existing commissioner precincts now have a total maximum deviation (i.e., as between the most populous and least populous precincts, measured in reference to the ideal precinct size) of 39.53%. This

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meant the existing plan was subject to challenge under the one person-one vote principle, because of a maximum deviation exceeding ten percent, which the courts have recognized as *prima facie* constitutional. Under the proposed plan the total maximum deviation is reduced to 3.93%.

(n) A statement of the anticipated effect of the change on members of racial or language minority groups.

The proposed changes in county commissioner precincts are in compliance with all applicable federal laws and neither has 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. The proposed change does not retrogress racial or language minorities' ability to effectively exercise their electoral franchise.

As noted in the above chart for total population for the existing districts, the majority of the population growth in Galveston County, according to the 2010 Census, occurred in current commissioner precinct four. In fact, that precinct is 17,112 people over the ideal district population causing the overall deviation to be 39.53%. Moreover, commissioner precincts four and two will continue to be the predominant growth areas for Galveston County because of the spillover of population from Harris County.

Leaving commissioner precinct four with a high deviation in population would appear to violate the principles announced by the court in *Larios v. Cox*, 300 F. Supp. 1320 (N.D. GA 2004), and affirmed by the U.S. Supreme Court in *Cox v. Larios*, 542 U.S. 947 (2004). Therefore, the high growth district could not be substantially over populated vis a vis the low growth districts. Therefore the commissioners court attempted to equalize districts as much as possible without creating a significant retrogression.

Similarly, in order to maintain the continuity of districts and limit the amount of voter confusion, the court attempted to maintain the core of the current districts and minimize the changes to the districts to the extent necessary to rectify the population deviations. Care was taken, consistent with these policies, to maintain the coalition of minority voting strength in precinct three close to the current voting strength without making radical changes to the existing districts so that a commissioner of the minority community's choice would still largely represent the same population within the current district.

Given the unique geography of Galveston County, which has two dramatically isolated geographic components – Galveston Island and Bolivar Peninsula – the proposed plan did not dramatically reshape the current configuration of districts. However, public comment did call for the joining of Bolivar Peninsula and Galveston Island into a commissioner precinct. The proposed plan accomplished the joining of those these two geographic

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areas, without appreciably increasing the Anglo vote in precinct three, following the same transportation structure that physically links them – the ferry route.

- (o) **A statement identifying any past or pending litigation concerning the change or related voting practices.**

There is currently no litigation involving the County's newly enacted redistricting plan.

- (p) **A statement that the prior practice has been precleared (with the date) or is not subject to the preclearance requirement and a statement that the procedure for the adoption of the change has been precleared (with the date) or is not subject to the preclearance requirement, or an explanation of why such statement cannot be made.**

The prior redistricting plan was precleared on February 5, 2002. A copy of the prior preclearance letter is attached hereto as Exhibit "E."

Section 51.28

- (a) **Demographic information**

- (1) **Total and voting age population of the affected area before and after the change, by race and language group.**

See charts above in response to Section 51.27(c).

- (2) **The number of registered voters for the affected area by voting precinct before and after the change, by race and language group.**

Data on registration by race is not collected or reported in Texas, although it is possible to determine the approximate number of persons who are registered voters who have Spanish surnames. This information, reported by the Texas Secretary of State, is attached as Exhibit "F."

- (3) **Any estimates of population, by race and language group, made in connection with the adoption of the change.**

It was not necessary to make any estimates in connection with the adoption of the change.

- (b) **Maps**

- (1) **The prior and new boundaries of the voting unit or units.**

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Maps depicting the newly adopted and the current commissioner precincts are attached hereto as Exhibits "C" and "D," respectively. Additionally, the maps are included on the disk included with this submission.

(2) The prior and new boundaries of voting precincts.

The change does not affect voting precincts.

(3) The location of racial and language minority groups.

The maps are included on the disk included with this submission.

(4) Any natural boundaries or geographical features that influenced the selection of the prior or new units.

All adjustments to the boundaries of the territories constituting the four county commissioner precincts are based on 2010 Census Geography as depicted on the latest TIGER files available from the Census Bureau. The precise boundaries of the census blocks used to build the commissioner precincts, in many instances, follow highways, county roads, city streets, and other geographic features, all as depicted in the 2010 TIGER files and as further depicted in the attached map of the proposed commissioner precincts as Exhibit "C."

(5) The location of prior and new polling places.

The change does not affect polling places.

(6) The location of prior and new voter registration sites.

The change does not affect voter registration.

(c) Annexations

Not applicable.

(d) Election Returns

Election returns for the past ten (10) years are being provided on magnetic media. Additionally, election returns from 2007 to 2010 may also be accessed on the County's website at <http://www.galvestonvotes.org/Resources/PastElectionReturns.html>.

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(e) **Language usage**

Not applicable.

(f) **Publicity and participation**

From the outset of the redistricting process, the Galveston County Commissioners Court took steps to ensure the full participation of all interested persons and groups. Specifically, the County conducted five (5) public hearings in addition to two regularly scheduled Commissioners Court meetings to take public input on redistricting.

At a Commissioners Court meeting held on August 2, 2011, the County's redistricting consultants presented a preliminary demographic report showing the results of the 2010 Census as they related to the existing commissioner precincts. This presentation highlighted the need to redistrict resulting from population imbalances among precincts that exceeded the ten percent maximum deviation acceptable under the one person-one vote requirement of the United States Constitution. At this meeting, the Court was also presented with two preliminary redistricting proposals for commissioner precincts and accepted public comment.

The Commissioners Court then conducted five (5) public hearings at various locations throughout the County to receive public comment on redistricting of county commissioner and justice of the peace precincts. The following is a list of the dates, times and locations of those meetings:

Date	Time	Location	Address
08/15/11	7:00 p.m.	Calder Road Annex	174 Calder Road League City, TX 77573
08/16/11	6:00 p.m.	West County Annex	11730 State Hwy. 6 Santa Fe, TX 77510
08/17/11	6:00 p.m.	Crystal Beach Annex	946 Noble Carl Road Crystal Beach, TX 77650
08/22/11	7:00 p.m.	Nessler Center	2010 Fifth Avenue North Texas City, TX 77590
08/23/11	7:00 p.m.	Galveston County Courthouse	722 Moody Galveston, TX 77550

The Commissioner Court met again on August 30, 2011, and received comment from the County's redistricting consultants and were presented with a new proposal that incorporated changes based upon public comment. Namely, the Bolivar Peninsula portion of Galveston County was included in the same commissioner precinct as a

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portion of Galveston Island as requested by the residents of Bolivar Peninsula. This proposal was adopted by the Commissioner Court by a vote of three to two.

(1) Copies of newspaper articles discussing the proposed change.

Copies of newspaper articles discussing the proposed changes are attached as Exhibit "G."

(2) Copies of public notices that describe the proposed change and invite public comment or participation in hearings and statements regarding where such public notices appeared (e.g., newspaper, radio, or television, posted in public buildings, sent to identified individuals or groups).

A copy of the notices of the public hearings and agendas of the Commissioners Court meetings at which the redistricting plans were discussed and/or adopted are attached as Exhibit "H."

(3) Minutes or accounts of public hearings concerning the proposed change.

Minutes of the Commissioners Court Meetings at which the proposed redistricting plans were discussed and adopted are attached as Exhibit "I." The meetings were tape recorded, and a transcript will be provided upon request.

(4) Statements, speeches, and other public communications concerning the proposed change.

Statements and public communications are reflected in the newspaper articles and minutes of the Commissioner Court meetings.

(5) Copies of comments from the general public.

Comments from the general public are reflected in the newspaper articles and minutes of the Commissioners Court meetings.

(6) Excerpts from legislative journals containing discussion of a submitted enactment, or other material revealing its legislative purpose.

Not applicable.

(g) Availability of the submission

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Attached as Exhibit "J" is a copy of the public notice which will be posted at the Galveston County Courthouse stating the availability of the preclearance submission for public inspection.

A complete duplicate copy of the submission is available for public inspection during normal business hours at the Galveston County Courthouse, Galveston, Texas.

(h) Minority group contacts

The following individuals reside in Galveston County, Texas, and are familiar with the proposed change, and were active in the political process by which the Plan was adopted:

The Honorable Stephen Holmes
Commissioner, Precinct 3
2516 Texas Avenue, Room 121
Texas City, TX 77590
(409) 770-5806

Dr. Dotti Jones
College of the Mainland
1200 Amburn Road
Texas City, TX 77591
(409) 938-1211

Rev. James Daniels
2327 Texas Avenue
Texas City, TX 77590

Henry Gomez
P.O. Box 3785
Galveston, TX 77552

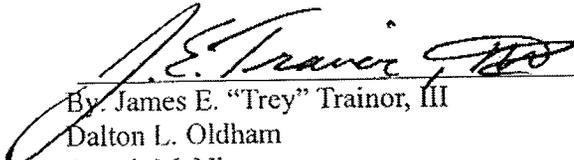
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It has been the purpose of this submission to provide available relevant information that will be helpful to the Department without unduly burdening the record. Please let me know if there is any underlying data or other information that the Department would find helpful when reviewing this submission.

Thank you for your assistance and expedited consideration.

Respectfully submitted,

BEIRNE MAYNARD & PARSONS L.L.P.
401 W. 15th Street, Suite 845
Austin, Texas 78701
(512) 623-6700
(512) 623-6701 fax


By: James E. "Trey" Trainor, III
Dalton L. Oldham
Joseph M. Nixon

ATTORNEYS FOR GALVESTON COUNTY, TEXAS

Exhibit

A

On this the 30th day of August, 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 No. 1;
Kevin O'Brien, Commissioner, Precinct No. 2;
Stephen D. Holmes, Commissioner, Precinct No. 3; and
Kenneth Clark, Commissioner, Precinct No. 4.

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

<p style="text-align: center;">An Order Establishing the Boundaries of the Commissioner Precincts in Galveston County</p>
--

Whereas, the Texas State Constitution provides that each county of the state shall be divided into four commissioners precincts in each of which there shall be elected by the qualified voters thereof one County Commissioner, who shall hold his office for four years and until his successor shall be elected and qualified; and

Whereas, an analysis of the 2010 decennial federal census disclosed that existing County commissioner precincts in Galveston County, Texas are substantially unequal in population; and

Whereas, due to the rapid expansion of population in portions of the County, the needs and convenience of the people, the one man – one vote principal established by the United States Supreme Court, the requirements of the Voting Rights Act of 1965, and the communities of interest, it would be advantageous and in the best interest of Galveston County to change and establish county commissioners precinct lines by changing the boundary lines of County Commissioners Precincts 1, 2, 3 and 4; and

Whereas, through a series of public hearings and meetings, the Commissioners Court of Galveston County received and considered oral testimony and various illustrative and proposed plans regarding the appropriate configuration of those commissioner precinct boundaries to balance the population of the respective precincts; and

It is Therefore Ordered by the Commissioners' Court of Galveston County, Texas, pursuant to the United States Constitution, the Texas Constitution, applicable Texas Statutes and the requirements of the Voting Rights Act of 1965, as amended, that effective on January 1, 2012, Galveston County, Texas shall be divided into four (4)

County commissioner precincts as depicted in Exhibit A to this Order, and which accurately depicts the boundaries and territories of the respective commissioner precincts.

Upon Motion of Commissioner Kenneth Clark and Seconded by Commissioner Kevin O'Brien the above Redistricting plan passed with 3 votes in favor thereof and 2 votes against.

Passed and Approved this 30th day of August, 2011.

County of Galveston

By: Mark Henry
Mark Henry, County Judge

Attest:
Dwight A. Sullivan
Dwight Sullivan
County Clerk

The seal of the County of Galveston is circular and features a five-pointed star in the center. The words "COUNTY OF GALVESTON" are inscribed around the perimeter of the seal.

Exhibit B

On this the 8th day of October, 2001, the Commissioners Court of Galveston County, Texas convened in a regularly scheduled meeting with the following members thereof present:

James D. Yarbrough, County Judge;
Eddie Barr, Commissioner, Precinct No. 1;
Eddie Janek, Commissioner, Precinct No. 2;
Stephen D. Holmes, Commissioner, Precinct No. 3;
Kenneth Clark, Commissioner, Precinct No. 4; and
Patricia Ritchie, County Clerk

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

<p style="text-align: center;">An Order Establishing the Boundaries of the Commissioner Precincts in Galveston County</p>
--

Whereas, the Texas State Constitution provides that each county of the state shall be divided into four commissioners precincts in each of which there shall be elected by the qualified voters thereof one County Commissioner, who shall hold his office for four years and until his successor shall be elected and qualified; and

Whereas, an analysis of the 2000 decennial federal census disclosed that existing County commissioner precincts in Galveston County, Texas are substantially unequal in population; and

Whereas, due to the rapid expansion of population in portions of the County, the needs and convenience of the people, the one man – one vote principal established by the United States Supreme Court, the requirements of the Voting Rights Act of 1965, and the communities of interest, it would be advantageous and in the best interest of Galveston County to change and establish county commissioners precinct lines by changing the boundary lines of County Commissioners Precincts 1, 2, 3 and 4; and

Whereas, the Commissioners Court of Galveston County established criteria to provide the County with a means by which to evaluate and measure proposed plans and established guidelines for public participation in the redistricting process; and

Whereas, through a series of public hearings and meetings, the Commissioners Court of Galveston County received and considered oral testimony, written evidence and various illustrative and proposed plans regarding the appropriate configuration of those commissioner precinct boundaries to balance the population of the respective precincts; and

It is Therefore Ordered by the Commissioners' Court of Galveston County, Texas, pursuant to the United States Constitution, the Texas Constitution, applicable Texas Statutes and the requirements of the Voting Rights Act of 1965, as amended, that effective on January 1, 2002, Galveston County, Texas shall be divided into four (4) County commissioner precincts as depicted in Exhibit A to this Order, which is a map denoted "Galveston County Commissioner Court Precincts Illustrative Plan 1F Revised" accurately depicting the boundaries and territories of the respective County commissioner precincts as redrawn, and which map is incorporated by reference into and made a part of this Order; and as documented in Exhibit B to this Order, which is a list of 2000 Census blocks assigned to each respective commissioner precinct; and in Exhibit C to this Order, which is a written description of County Commissioners Precincts 1, 2, 3, and 4, all of which are incorporated by reference into and made a part of this Order.

The rest of this page has intentionally been left blank.

Upon Motion of County Judge James D. Yarbrough and Seconded by Commissioner Eddie Janek the above Order passed with 4 votes in favor thereof and 1 vote against.

Passed and Approved this 8th day of October, 2001.

County of Galveston

By: _____
James D. Yarbrough, County Judge

Eddie Barr, Comm., Pct. #1

Eddie Janek, Comm., Pct. #2

Stephen D. Holmes, Comm., Pct. #3

Against
Kenneth Clark, Comm., Pct. #4

Attest:

Patricia Ritchie
County Clerk

Exhibit C

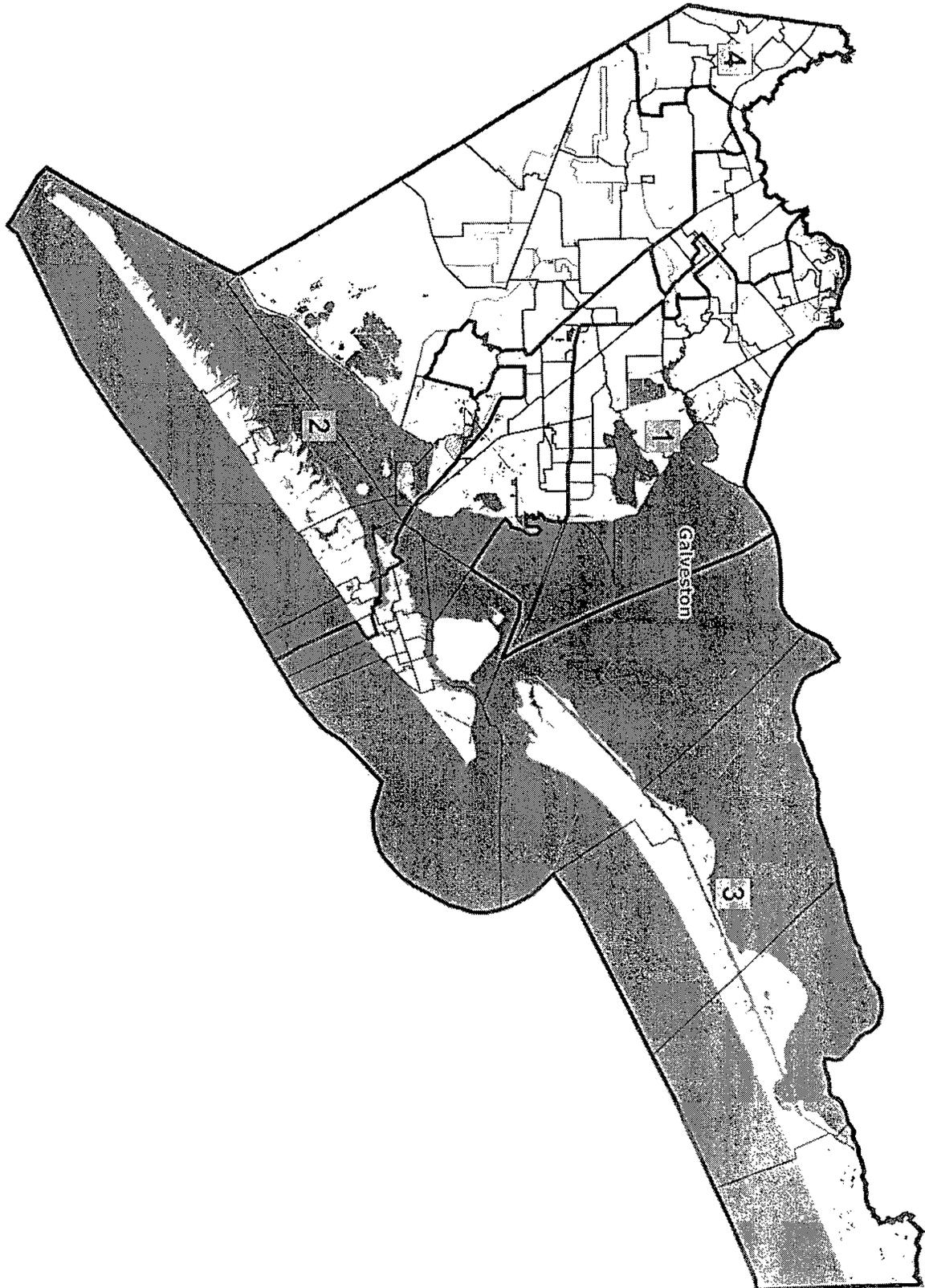
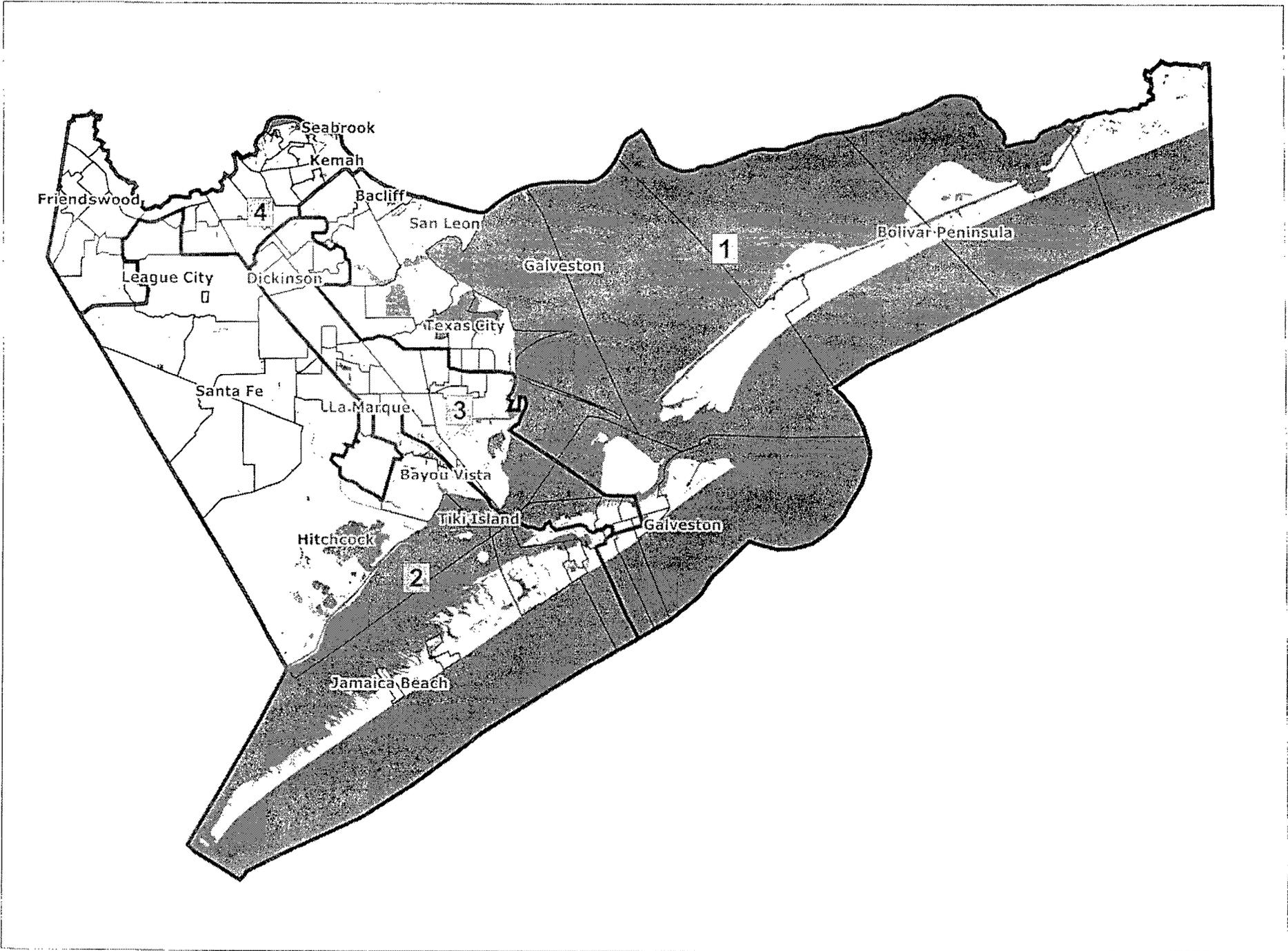


Exhibit D



Exhibit

E

300-31-1368

No Objection Letter from United States Department of Justice on the 2001 redistricting plan for the Commissioners' Court and reduction in the number of Justices of the Peace and Constables from nine to eight, received and filed on motion of Commissioner Barr, seconded by Commissioner Janek, and carried

Feb-05-02 01:06P

FROM COMM DIVISION

HARRY P. 02 P 02/02

7



Civil Rights Division



JDR:CKD-ALP jdh
DJ 166-012-3
2001-3923

Voting Section - NWS
930 Pennsylvania Avenue, N.W.
Washington, DC 20530

February 5, 2002

Sydney W. Falk, Jr., Esq
Bickerstaff, Heath, Smiley,
Dollan, Keever & McDaniel
816 Congress Avenue, Suite 1700
Austin, Texas 78701-2443

Dear Mr Falk

This refers to the 2001 redistricting plan for the commissioners court, the reduction in the number of justices of the peace and constables from nine to eight, and two 2001 redistricting plans for the justice of the peace and constable districts for Galveston County, Texas, submitted to the Attorney General pursuant to Section 5 of the Voting Rights Act, 42 U.S.C. 1973c. We received your submission on December 7, 2001; supplemental information was received through January 31, 2002.

The Attorney General does not interpose any objection to the specified changes. However, we note that Section 5 expressly provides that the failure of the Attorney General to object does not bar subsequent litigation to enjoin the enforcement of the changes. See the Procedures for the Administration of Section 5 (28 C.F.R. 51.41)

Sincerely,

Joseph D. Rich
Chief, Voting Section

TOTAL P.02

013

Exhibit F

County Election Analysis by Precinct
2010 General Election 11/2/2010

Texas Legislative Council
Tread - D

Galveston County

Precinct	VR	TO	TO%	SSVR%	Perry	%	White	%	Governor Class	%	Shatto	%	Barron	%
0101	313	148	47.3	4.5	73	49.3	72	48.6	2	1.4	1	0.7	0	0.0
0102	249	37	14.9	1.6	23	62.2	12	32.4	2	5.4	0	0.0	0	0.0
0103	1,131	333	29.4	3.4	182	54.7	136	40.8	13	3.9	2	0.6	0	0.0
0104	709	207	29.2	6.6	124	59.9	81	39.1	2	1.0	0	0.0	0	0.0
0105	1,972	592	30.0	11.8	248	41.9	336	56.8	6	1.0	2	0.3	0	0.0
0106	2,830	850	30.0	18.1	288	33.9	538	63.3	19	2.2	5	0.6	0	0.0
0107	1,771	549	31.0	18.2	120	21.9	413	75.2	8	1.5	8	1.5	0	0.0
0108	2,337	748	32.0	20.7	165	22.1	566	75.7	13	1.7	4	0.5	0	0.0
0115	2,893	942	32.6	27.4	234	24.8	683	72.5	20	2.1	5	0.5	0	0.0
0118	2,403	870	36.2	25.4	345	39.7	507	58.3	13	1.5	5	0.6	0	0.0
0146	2,695	1,054	39.1	18.8	533	50.6	490	46.5	22	2.1	9	0.9	0	0.0
0148	2,034	667	32.8	20.6	308	46.2	340	51.0	15	2.2	4	0.6	0	0.0
0149	2,255	983	43.6	17.7	541	55.0	420	42.7	16	1.6	6	0.6	0	0.0
0151	2,439	971	39.8	21.5	472	48.6	481	49.5	15	1.5	3	0.3	0	0.0
0159	2,936	1,067	36.3	8.8	719	67.4	317	29.7	25	2.3	6	0.6	0	0.0
0165	2,385	824	34.5	13.2	485	58.9	308	37.4	26	3.2	5	0.6	0	0.0
0168	1,484	690	46.5	7.3	473	68.6	204	29.6	12	1.7	1	0.1	0	0.0
0172	0	0	0.0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
0173	265	148	55.8	5.7	102	69.4	43	29.3	1	0.7	1	0.7	0	0.0
0194	175	85	48.6	25.1	41	48.2	41	48.2	2	2.4	1	1.2	0	0.0
0195	1,414	445	31.5	16.5	265	59.6	167	37.5	10	2.2	3	0.7	0	0.0
0196	68	24	35.3	8.8	16	69.6	7	30.4	0	0.0	0	0.0	0	0.0
0197	981	323	32.9	14.3	196	61.1	117	36.4	7	2.2	1	0.3	0	0.0
0199	184	78	42.4	8.2	46	60.5	25	32.9	5	6.6	0	0.0	0	0.0
0216	1,543	510	33.1	21.5	250	49.0	246	48.2	12	2.4	2	0.4	0	0.0
0217	2,716	783	28.8	34.0	253	32.3	515	65.8	14	1.8	1	0.1	0	0.0
0219	1,027	385	37.5	23.7	132	34.3	238	61.8	12	3.1	3	0.8	0	0.0
0220	784	358	45.7	13.6	160	45.2	188	53.1	4	1.1	2	0.6	0	0.0
0221	5,618	2,378	42.3	13.4	1,457	61.3	862	36.2	51	2.1	8	0.3	0	0.0
0222	1,845	857	46.4	5.7	508	59.3	326	38.0	19	2.2	4	0.5	0	0.0
0223	1,625	367	22.6	24.1	141	38.5	215	58.7	8	2.2	2	0.5	0	0.0
0224	2,249	757	33.7	20.9	324	42.8	419	55.4	12	1.6	2	0.3	0	0.0
0225*	2,086	864	41.4	11.4	406	47.0	443	51.3	12	1.4	3	0.3	0	0.0
0226*	2,720	1,461	53.7	10.0	997	68.2	434	29.7	23	1.6	7	0.5	0	0.0
0227	2,801	1,099	39.2	14.1	554	50.4	506	46.0	34	3.1	4	0.4	1	0.1
0227	3,019	1,310	43.4	10.6	870	66.4	409	31.2	25	1.9	4	0.3	2	0.2

*Voter registration for consolidated precincts is not reflected on this report.

CNTY provides a county total when precinct-level returns are not available.

0228	2,975	1,437	48.3	7.2	1,028	71.5	373	26.0	33	2.3	3	0.2	0.0
0201	66	35	53.0	7.6	25	71.4	10	28.6	0	0.0	0	0.0	0.0
0232	2,436	1,070	43.9	13.1	503	47.0	543	50.7	21	2.0	3	0.3	0.0
0258	2,307	944	40.9	10.4	632	66.9	276	29.2	30	3.2	6	0.6	0.0
0263	4,408	2,185	49.6	10.4	1,582	72.4	564	25.8	39	1.8	0	0.0	0.0
0274	808	352	43.6	5.8	227	64.5	115	32.7	9	2.6	0	0.0	0.3
0275	314	180	57.3	4.5	121	67.2	54	30.0	5	2.8	0	0.0	0.0
0276	1,771	700	39.5	12.8	333	47.6	355	50.7	11	1.6	1	0.1	0.0
0277	2,520	1,058	42.0	10.6	709	67.0	321	30.3	23	2.2	5	0.5	0.0
0278	2,636	1,122	42.6	10.1	744	66.3	333	29.7	36	3.2	9	0.8	0.0
0279	1,114	463	41.6	9.2	319	69.0	129	27.9	14	3.0	0	0.0	0.0
0280	102	62	60.8	14.7	45	73.8	12	19.7	3	4.9	1	1.6	0.0
0281	212	100	47.2	15.1	69	69.0	29	29.0	2	2.0	0	0.0	0.0
0286	1,448	725	50.1	10.2	516	71.2	193	26.6	15	2.1	1	0.1	0.0
0309	130	31	23.8	38.5	4	12.9	27	87.1	0	0.0	0	0.0	0.0
0310	664	148	22.3	11.6	21	14.2	124	83.8	1	0.7	2	1.4	0.0
0311	809	133	16.4	15.6	8	6.3	119	93.0	0	0.0	1	0.8	0.0
0312	0	0	0.0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0.0
0313	757	243	32.1	7.5	29	12.0	208	86.0	4	1.7	1	0.4	0.0
0314	1,831	615	33.6	18.1	62	10.1	550	89.4	3	0.5	0	0.0	0.0
0329*	1,197	375	31.3	18.9	115	30.9	245	65.9	8	2.2	4	1.1	0.0
0330	1,956	630	32.2	15.7	164	26.0	449	71.3	14	2.2	3	0.5	0.0
0331	1,935	786	40.6	7.0	111	14.1	671	85.4	4	0.5	0	0.0	0.0
0333	1,054	472	44.8	13.4	143	30.3	320	67.8	8	1.7	1	0.2	0.0
0334*	1,346	480	35.7	6.8	30	6.3	444	92.5	3	0.6	3	0.6	0.0
0340	891	315	35.4	13.5	72	22.9	239	76.1	3	1.0	0	0.0	0.0
0341	2,142	665	31.0	24.4	370	55.6	274	41.2	19	2.9	1	0.2	0.0
0345	1,476	365	24.7	15.2	34	9.4	322	89.4	4	1.1	0	0.0	0.0
0343	2,007	489	24.4	31.8	147	30.1	331	67.7	9	1.8	2	0.4	0.0
0344	1,660	647	39.0	14.0	426	66.0	201	31.2	15	2.3	3	0.5	0.0
0335	1,301	490	37.7	15.0	199	40.7	281	57.5	8	1.6	1	0.2	0.0
0336	2,686	1,159	43.1	2.0	20	1.7	1,133	97.9	1	0.1	3	0.3	0.0
0337	1,044	410	39.3	7.9	63	15.5	342	84.2	0	0.0	1	0.2	0.0
0338	2,520	1,029	40.8	10.8	248	24.1	765	74.5	9	0.9	4	0.4	0.1
0339*	2,543	1,064	41.8	13.2	664	62.4	379	35.6	17	1.6	4	0.4	0.0
0347	1,988	607	30.5	19.6	164	27.0	436	71.8	6	1.0	0	0.0	0.2
0301	829	285	34.4	14.6	117	41.1	164	57.5	4	1.4	0	0.0	0.0
0302	2	1	50.0	0.0	0	0.0	1	100.0	0	0.0	0	0.0	0.0
0369	104	23	22.1	35.6	8	34.8	15	65.2	0	0.0	0	0.0	0.0
0389	1,998	962	48.1	8.4	527	54.8	415	43.1	19	2.0	1	0.1	0.0
0398	984	319	32.4	26.6	179	56.1	138	43.3	2	0.6	0	0.0	0.0
0452	2,167	1,204	55.6	5.4	880	73.1	313	26.0	9	0.7	1	0.1	0.1
0453	3,231	1,321	40.9	18.3	838	63.4	450	34.1	28	2.1	5	0.4	0.0
0454	3,541	1,541	43.5	12.9	971	63.0	542	35.2	22	1.4	5	0.3	0.1
0455	2,209	884	40.0	14.3	545	61.7	311	35.2	25	2.8	1	0.1	0.2
0456	3,063	1,739	56.8	5.0	1,313	75.5	400	23.0	23	1.3	3	0.2	0.0
0457	2,073	1,034	49.9	9.6	776	75.0	236	22.8	17	1.6	4	0.4	0.1
0460	2,435	1,320	54.2	4.1	969	73.4	321	24.3	25	1.9	5	0.4	0.0
0461	1,526	826	54.1	6.9	653	79.1	158	19.1	9	1.1	6	0.7	0.0
0462	2,836	1,640	57.8	6.0	1,254	76.5	355	21.6	27	1.6	4	0.2	0.0
0464	2,780	1,397	50.3	8.7	977	69.9	389	27.8	28	2.0	3	0.2	0.0
0466	2,748	1,234	44.9	7.3	808	65.5	393	31.8	25	2.0	8	0.6	0.0

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CNTY provides a county total when precinct-level returns are not available.

0467	2,885	1,297	45.0	6.0	907	69.9	359	27.7	25	1.9	6	0.5	0	0.0
0470	2,811	1,309	46.6	8.1	915	69.9	364	27.8	24	1.8	5	0.4	1	0.1
0471	1,322	692	52.3	13.4	437	63.2	244	35.3	10	1.4	1	0.1	0	0.0
0482	75	41	54.7	17.3	28	68.3	11	26.8	2	4.9	0	0.0	0	0.0
0483	1,895	982	51.8	9.2	719	73.2	237	24.1	23	2.3	1	0.1	2	0.2
0484	2,388	1,306	54.7	6.5	999	76.5	281	21.5	26	2.0	0	0.0	0	0.0
0485	2,677	1,545	57.7	5.9	1,197	77.5	334	21.6	12	0.8	2	0.1	0	0.0
0487	3,554	1,682	47.3	11.9	1,048	62.3	598	35.6	36	2.1	0	0.0	0	0.0
0488	2,406	1,019	42.4	13.8	680	66.7	323	31.7	15	1.5	1	0.1	0	0.0
0490	3,272	1,520	46.5	9.5	1,052	69.2	436	28.7	28	1.8	3	0.2	1	0.1
0491	2,453	1,238	50.5	7.1	841	67.9	371	30.0	20	1.6	5	0.4	1	0.1
0492	2,091	928	44.4	7.0	624	67.2	289	31.1	12	1.3	3	0.3	0	0.0
0493	1,798	938	52.2	9.0	661	70.5	258	27.5	15	1.6	4	0.4	0	0.0
0401	0	0	0.0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
0402	2	3	150.0	0.0	2	66.7	1	33.3	0	0.0	0	0.0	0	0.0
0342	1,282	331	25.8	34.3	117	35.3	199	60.1	10	3.0	5	1.5	0	0.0

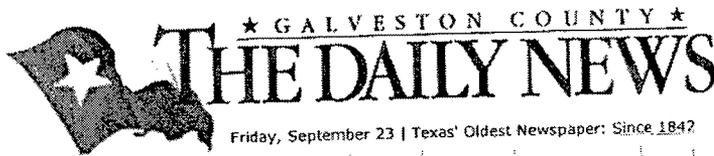
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CNTY provides a county total when precinct-level returns are not available.

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CNTY provides a county total when precinct-level returns are not available.

Exhibit G

Redistricting could change political landscape



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Redistricting could change political landscape

By **T.J. Aulds**
The Daily News

Published August 1, 2011

The political landscape is about to be redrawn, and Tuesday the proposed maps of the change will be made public. County commissioners are scheduled to review redistricting maps, which are expected to change the shape of the commissioners' and justices of the peace and constable precincts.

A firm hired in the spring by the county has been working on the redistricting process and is scheduled to present to commissioners three maps that will be the guides for reshaping the precincts.

Two of the maps are proposed changes to the county commissioners precincts, while the third is a change to the justices of the peace and constable precincts, County Judge Mark Henry said.

Once they are unveiled, commissioners will take public comments. The plan is to have a series of public hearings and workshops in each precinct to get voter input, Henry said.

While Henry hadn't seen the proposed maps, he said information from the firm hired to redraw the precincts indicated that county commissioner lines will for the most part stay as they are with few adjustments, Henry said. In particular, Precinct 4 — the largest precinct in the county — will lose some population to Precinct 1.

Henry said he asked those creating the maps to start with the existing precinct lines as a baseline and make adjustments from there.

"Those lines were good enough in 2001, so I am hoping they should be OK this time around," Henry said. "I am hoping (the firm) didn't start from scratch."

But, even the slightest adjustment involving Pct. 1 is likely to set off a political battle. Commissioner Patrick Doyle, a Democrat, is the Pct. 1 commissioner.

His seat is one of two seats on the court held by Democrats on the Republican controlled commissioners court.

Any shift of the Republican friendly north county precincts now in Precinct 4 to Doyle's precinct makes it more favorable for a Republican to win that seat in next year's election.

Precinct 3, held by Commissioner Stephen Holmes, is the one minority-majority precinct and is expected to remain Democrat friendly.

It's because of the likely shift that would change the political base of Precinct 1 that Galveston County Democratic Party Chairman Lloyd Criss has pledged to file a lawsuit over redistricting.

It wouldn't be the first time a political party filed a lawsuit over the redrawing of commissioner precincts. Republicans did the same in an unsuccessful legal claim 10 years ago.

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Redistricting could change political landscape

But what may set up an even bigger fight will be proposed changes to the justices of the peace and constable precincts. Galveston County has nine justices of the peace and eight constables.

The Precinct 8 justice of the peace district is divided in two with one constable.

Henry has pushed for reducing the number of precincts in the county, pointing to the lack of casework in many of the courts.

While not certain what the proposed maps will reveal, Henry said information from the county's firm indicates that the justice of the peace and constable precincts are proposed to be reduced to six or possibly five.

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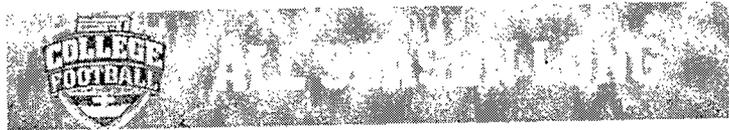
WHAT: County Commissioners meeting

WHEN: 1 p.m. Tuesday

WHERE: Galveston County Courthouse, 722 Moody, in Galveston

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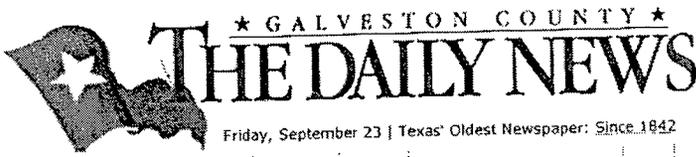
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INDIANA vs NORTH TEXAS
SATURDAY 6:00PM CT

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Redistricting: How will commissioners vote?

By T.J. Aulds
The Daily News

Published August 29, 2011

Predictions abound as to how the votes will go Tuesday when county commissioners take up the issue of redistricting. But don't be surprised if none of the maps proposed by either the county's consultants or county commissioners gets a 3-2 vote.

The redistricting process has been more nuanced than critics and proponents of the proposed maps have expressed in public hearings. For County Judge Mark Henry, that was comments from Bolivar Peninsula residents who insist that the four unincorporated communities on the peninsula have more in common with residents on Galveston Island, and that any map should keep the island and Bolivar in the same precinct.

"I discounted anything that was partisan," Henry said of the five public hearings held. "We had folks coming up saying they were for map 1 or 2, but gave no reason."

Others contended maps 1 or 2 were unfair but for reasons that Henry said he didn't consider to meet the standards of the law for redistricting. That included comments from members of the Texas City-La Marque Chamber of Commerce and representatives from Texas City's industry base who urged Henry that any precinct maps should give a better chance for someone from Texas City to be elected to the court.

The county's legal consultants told the judge the changes could be made without having to draw up a new map and go through another public comment period since the changes he plans to propose are from the public comments, Henry said.

Clark Spent 10 Years On Process

Precinct 4 Commissioner Ken Clark, who has been the most involved in the process, said if he had drawn a map for consideration, it would have all of Galveston — including the West End — and the Bolivar Peninsula within one precinct that might have included Tiki Island and maybe parts of Hitchcock. That concept is similar to a map Clark drew up 10 years ago and suggested to the commissioners court during the last redistricting process.

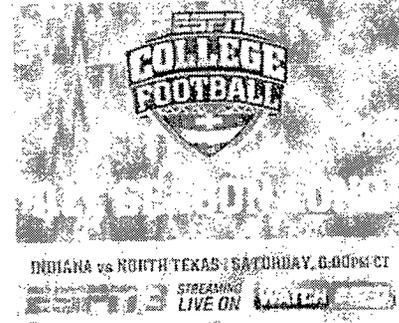
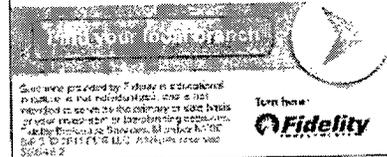
"With the state and federal laws, that somewhat binds us on what we can and can't do," Clark said.

But it appears that Clark, who said he would support versions of the two maps drawn up by the county's consultants, did indeed draw up maps suggesting the new political boundaries. Those maps have not been made public.

Within hundreds of records obtained by The Daily News through an open records request, a June 16 email to County Judge Mark Henry's office from Joe Nixon, who works for the firm hired as the county's consultant, indicates Clark provided guide maps for the consultants to follow.

"Commissioner Clark has sent us several maps to review," Nixon wrote. "We are

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Redistricting: How will commissioners vote?

in the process of doing a review of each of those maps. It's our intent to sit down with each commissioner in the next two weeks to hear from each of them how they would like the maps to look and to have choices then to begin narrowing down."

Clark wasn't shy in acknowledging his active role in meeting with the consultants and the county's redistricting process in general.

"I probably started working on this redistricting as soon as the last one ended," Clark said.

That's because the commissioner felt that the last process 10 years ago packed his precinct in an unfair manner, especially politically.

The commissioner said most of his work with the consultants was done verbally and few items were in writing. But the maps Nixon referenced were not included in the documents Clark's office turned over to The Daily News, despite the newspaper's request for all correspondence related to redistricting.

O'Brien Offers Mixed Messages

Where Precinct 2 Commissioner Kevin O'Brien stands depends on whether you read his column published in Thursday's edition of The Daily News or his comments to the newspaper after he had submitted the column.

In his column, O'Brien said he would support either maps 1 or 2 and discounted a map drawn up by Precinct 3 Commissioner Stephen Holmes, stating it "would repeat the injustice of 2001 by packing fast growing North County area into the largest precincts."

But on the day before his guest column was published, O'Brien said he was keeping an open mind and would review the issue further while on a county-related trip to Austin last week.

He insisted he had not made up his mind nor discounted any of the proposed maps even saying that he wouldn't make a decision until "the fat lady sings."

"I've got to go back to the one person, one vote (concept)," O'Brien said in his interview. "We are not going to make everyone happy, but I am trying to do the right thing."

That right thing, the commissioner said was to keep an open mind to all he heard and reviewed.

O'Brien said he was also keeping an open mind on the justices of the peace and constable maps, even though he proposed a map that would reduce the number of precincts to four. He said he drew that map because he had heard from voters who questioned why the court wasn't considering four precincts.

Henry said he supports the five-precinct map, while Clark didn't express support for any particular justice of the peace map.

+++

Editor's note: This is the first part of a two-part series on county commissioners' views on the redistricting process because the court votes Tuesday. Today, the Republican majority on the court expresses its views, while the Democrats will be featured in Tuesday's edition.

+++

WHAT: County Commissioners Court

WHEN: 1 p.m. Tuesday

WHERE: County Courthouse, 722 Moody in Galveston

ON AGENDA: Redistricting vote and county fiscal year budget

Related Items

- Poll: Which County Commissioner map do you support?
- Poll: Which JP/Constable map do you support?

- [Commissioners approve precinct boundaries](#)
- [Two more redistricting map proposals offered](#)
- [Redistricting: What do Democrats say on issue?](#)

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INDIANA vs NORTH TEXAS
SATURDAY 6:00PM CT

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Two more redistricting map proposals offered

By **T.J. Aulds**
The Daily News

Published August 30, 2011

On the eve of Galveston County Commissioners' vote on new precinct lines, two new maps were introduced.

The maps, one for county commissioners and the other for justices of the peace and constable precincts, adjusted lines based on a request from the county judge.

There is very little difference between what is now being called Map 1A and the original map the law firm Beirne, Maynard & Parsons drew up for justices of the peace and constable precincts that would reduce the number of justices of the peace from nine to five and constables from eight to five. The main parts of the county still are divided in four with Bolivar Peninsula still getting its own justice of the peace and constable.

The more significant change comes in how the county commissioner boundaries are drawn.

At County Judge Mark Henry's request, the firm revised the lines to ensure that the peninsula would remain in the same commissioner's precinct as Galveston.

Beirne, Maynard & Parsons attorney Trey Trainor, in an email to Henry and county commissioners, said the new 1A commissioners map is a combination of the first two maps his firm drew up for commissioners.

It would shift Galveston's east end and the peninsula out of Precinct 1 — currently held by Patrick Doyle — and shift those communities into Precinct 3, which is represented by Commissioner Stephen Holmes. The new precinct 3 also drifts a bit more north based on a rough map Henry provided to The Daily News on Monday afternoon.

With the late introduction of the maps, Holmes called for a delay in the vote on redistricting, which is scheduled for today.

Holmes reiterated his earlier call for the final vote on the maps to come Sept. 13, two days before a deadline set by the county's consultants to submit the approved maps to the U.S. Department of Justice for review.

"My original suggestion was to have a two week lag after the public hearings just so any adjustments made would have time for input," Holmes said. "We got two new maps and the public did not get a chance to make comment on (them)."

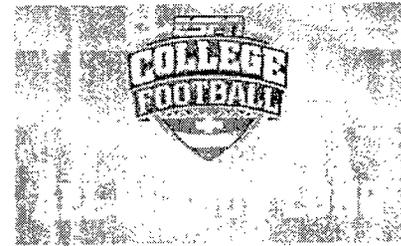
The commissioner has a county commissioner and constable map he proposed that are technically under consideration, although its expected his maps won't have enough votes to get commissioners court approval.

Don't count on any delay.

"After having been criticized for delays, I'm planning on passing one of the (the commissioner and justice of the peace/constable) maps," Henry said. "The new



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More meetings planned for maps

GOVERNMENT: Peninsula residents not quite on board

By T.J. AULDS
The Daily News

The county has added a fifth public hearing to its list of public meetings on

the proposed redistricting of county commissioners, justices of the peace and constables precincts.

The series of meetings start Monday in League

City and will now include a session next week in Crystal Beach on the Bolivar Peninsula.

See MAPS/B4

GALVESTON COUNTY, TEXAS

MAPS

Continued from Page B1

The meeting will be at 6 p.m. Wednesday in the Justice of the Peace Precinct 6 courtroom at 946 Noble Carl Road in Crystal Beach. The first meeting will be at 7 p.m. Monday at the county's Calder Road Annex, 174 Calder Road, in League City.

A meeting at 6 p.m. Tuesday will be at the West County Annex, 11730 state Highway 6, in Santa Fe. There will be a meeting at 7 p.m. Aug. 22 at the Nessler Center, 2010 Fifth Ave. N., in Texas City, and at 7 p.m. Aug. 23, the hearing will be at the Galveston County Courthouse, 722 Moody, in Galveston.

Under the proposed justices of the peace redistricting plan, the Bolivar Peninsula will retain its own justice of the peace and constable.

Under two plans for the commissioners redistricting, the peninsula remains in Precinct 1; however, another one of the maps suggests moving the Bolivar communities of Port Bolivar, Crystal Beach, Gilchrist and High Island into Precinct 3.

Some residents on the peninsula have complained to county commissioners that a county commissioner who represents League City and other parts of the mainland would not focus enough on the peninsula's needs, which is the largest unincorporated

County revises schedule on redistricting hearings

GOVERNMENT: Public hearing for maps Friday, vote will be Aug. 30

By T.J. AULDS
The Daily News

A day after county commissioners approved a schedule of public hearings and vote on a redistricting plan for the county commissioner, justices of the peace and constable precincts, the schedule changed.

A public hearing scheduled for Friday in Santa Fe was moved to Tuesday, while the date of the final vote on the plan will be Aug. 30 instead of Sept. 6, County Judge Mark Henry said.

A conflict with state open meetings law requirements for post-

See MAPS/A7

At a glance

Revised county redistricting hearings schedule

7 p.m. Monday
Calder Road Annex, 174 Calder Road in League City

6 p.m. Tuesday
West County Annex, 11730 state Highway 6, in Santa Fe

7 p.m. Aug. 22
Nessler Center, 2010 Fifth Ave. N., in Texas City

7 p.m. Aug. 23
Galveston County Courthouse, 722 Moody, in Galveston

Final vote on redistricting maps
1 p.m. Aug. 30
Galveston County Courthouse, 722 Moody in Galveston

FIND THE MAPS: Maps are on display at the county courthouse and each of the county annex buildings. Free black and white copies of maps also are available. Color plot maps are available for \$3 at the county engineer office, 722 Moody in Galveston. Maps also are available online at galvnews.com.

PUBLIC COMMENT: Residents wanting to sound off on the proposed maps can do so through their county commissioner's office, county judges' office or public comment boxes at the county annex buildings.

MAPS

Continued from Page A1

ing a public meeting 72 hours in advance forced the change in the meeting scheduled for the West County Building.

Henry said Commissioner Pat Doyle's request for the change in the day of the final vote prompted Henry to move the vote date to Aug. 30. Doyle will be out of the country Sept. 6.

County Commissioner Stephen Holmes, who had pressed for the final vote to be Sept. 13 to give the public more time to comment on the maps, was surprised by the judge's decision to move the meeting up.

"I assumed we would have done that as a stand-alone item on Sept. 8," Holmes said, noting Doyle's email indicated the commissioner would

be back on Sept. 7. "I wasn't under the impression moving it up would be an option. I do agree all the commissioners need to be there and cast their votes, but we could have called a special meeting a couple of days later."

The county commissioners are considering three maps for commissioners precincts and one map that significantly changes the justices of the peace and constables precincts.

Map No. 1 proposes changing Precinct 1, represented by Doyle, to include the eastern portion of League City, including South Shore Harbour as well as Clear Lake Shores and Kemah. In addition to shifting population from the county's most populated precinct to its least, it also turns that precinct into a Republican-favored precinct.

Doyle is a Democrat.

Holmes, who represents Precinct 3, proposed his own map that instead shifts the western portion of Precinct 4, represented by County Commissioner Ken Clark, into Precinct 2, represented by Kevin O'Brien. It also would remove some of Galveston's voting precincts from Precinct 2 and move them into Precinct 3.

Clark and O'Brien are Republicans.

The justices of the peace and constables map proposed reducing the number of precincts from eight to five and eliminating four elected

justices of the peace and three elected constables.

Mainland Editor T.J. Aulds can be reached at 409-663-533 or tjaulds@galvnews.com.

GALVESTON COUNTY, TEXAS

MONDAY, AUGU

Public hearings on redistricting set this week

GOVERNMENT: Commissioners will vote on maps next week

By T.J. AULDS
The Daily News

There are two more public hearings on the county's redistricting proposals for the county commissioners, justices of the peace and constable precincts before commissioners vote on the final maps next week.

The fourth of five hearings will be tonight at the

At a glance

Redistricting meetings
WHEN: 7 p.m. today
WHERE: Nessler Center
2010 Fifth Ave. N. in
Texas City

WHEN: 7 p.m. Tuesday
WHERE: County court-
house, 722 Moody in
Galveston

Nessler Center in Texas City, while the final session will be Tuesday at the Galveston County Courthouse in Galveston. County commissioners are scheduled to vote on

the final map Aug. 30.

There are three proposed county commissioner precinct maps. Two were proposed by the county's redistricting consultant, while the third was drawn by Precinct 3 County Commissioner Stephen Holmes.

There also are three proposed justices of the peace/constables maps. One was drawn up by the county consultants and calls for the county to drop four justice of the peace and three county constable precincts via merging precincts.

The county has nine

justices of the peace in eight precincts and eight constable precincts.

A map drawn by Holmes keeps precincts as they are while a map submitted by Precinct 2 County Commissioner Kevin O'Brien proposes only four justices of the peace and constable precincts.

The maps will have to be submitted to the U.S. Department of Justice for approval.

The plans must meet the criteria of the federal Voters Right laws.

Mainland Editor T.J. Aulds can be reached at 409-683-5334 or tjaulds@galvnews.com.

Proposed map cuts four JPs, three constables

GOVERNMENT: Redistricting proposals under review; details to be made available to public

By T.J. AULDS
The Daily News

The proposed redistricting map county commissioners will review Monday suggests the county have

only five justice of the peace and constable precincts. If approved, it would eliminate seven elected offices — three constables and four justices of the peace — from county government while merging

several precincts. County commissioners will review the proposed redistricting maps today, including two maps outlining possible changes to the county commissioners precincts.

County Judge Mark Henry showed rough versions of the maps to The Daily News on Monday. Detailed maps are expected

See REDISTRICTING/A7

GAVIATION COUNTY TEXAS

RESTRICTING ON THE WEB

... The ... of the ...

County commissioner offers own redistricting map plan

GOVERNMENT
Holmes says his plan stands better chance with Justice Dept.

By LA. ARDS
in Jackson

As county commissioners get out in the field to survey public meetings to get input on proposed redistricting maps, Precinct 2

County Commissioner Stephen Holmes introduced a map he says will be put to the voters. Each year, commissioners meet to review precinct boundaries. This year, they met and a third map that proposed redistricting the number of precincts in the county and establishing precincts to use from the year 2000.

Under the Holmes redistricting plan, much of the unincorporated Precinct 2, including some areas in the north and west, would be shifted to Precinct 1. The Holmes plan, Precinct 2 is proposed by Commissioner Holmes and would take some of the most heavily populated areas in the county, which is represented by Rep. Clark. Precinct 1, the District 1, would split Holmes' old Precinct 2 into two parts.

able redistricting plan. Holmes said he would like to see more of the county's population in Precinct 1. Holmes said he would like to see more of the county's population in Precinct 1. Holmes said he would like to see more of the county's population in Precinct 1.

By MPP/22

MAP

(Continued from Page 4)

precinct matter with the U.S. Department of Justice. Holmes said he will be in any plan adopted by the county to ensure it meets with Justice Dept. officials in the U.S. Justice Dept.

A loose breakdown of the Holmes plan, which the commissioner said was drafted after the county's redistricting board the three proposed maps under Precinct 2 and Precinct 1.

• Precinct 1: Adding precincts 222, 223 and 224 to Precinct 1. Also adding part of Precinct 221 to Precinct 1.

• Precinct 2: Adding precincts 450, 471, 472 and 485 to Precinct 2. Also adding Precinct 216, 217, 222, 223 and 224 to Precinct 2.

• Precinct 3: Adding precincts 211 and 217 to Precinct 3.

At a glance

- Precinct 1: Adding precincts 222, 223 and 224 to Precinct 1. Also adding part of Precinct 221 to Precinct 1.
- Precinct 2: Adding precincts 450, 471, 472 and 485 to Precinct 2. Also adding Precinct 216, 217, 222, 223 and 224 to Precinct 2.
- Precinct 3: Adding precincts 211 and 217 to Precinct 3.

ing precinct 222 in La. Morgan. Also a portion of precinct 221 in La. Morgan and about 100 people in the southern portion of Precinct 221.

• Precinct 4: Adding precincts 473, 474, 475 and 486 to Precinct 4.

"I want a map that will withstand justice department review," Holmes said, noting that the two proposed maps — which he called the Ken Clark map — would fly with the state department.

Clark, a Democrat, said he would like to see more of the county's population in Precinct 1. Holmes said he would like to see more of the county's population in Precinct 1.

Holmes, who with Clark is a Democrat, said he would like to see more of the county's population in Precinct 1. Holmes said he would like to see more of the county's population in Precinct 1.

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Clark, Obama and Count Judge Mark Holmes are making up the Republican team in the state. Holmes said he would like to see more of the county's population in Precinct 1.

Clark, Obama and Count Judge Mark Holmes are making up the Republican team in the state. Holmes said he would like to see more of the county's population in Precinct 1.

"We hope it's a fair process," Holmes said. "I'm not sure that will be the case. I don't know if voters should put their cards on the table, too the other side?"

Clark said he is the better horse to bet on the process than Democratic strategists.

"I talked with the attorney a number of times and he said what I thought would be a good idea, but I don't know if you should take a Council opinion. This did not go to the Commission. I am fairly sure the redistricting is good and will be a good thing for the state."

"I am somewhat of a pessimist," Clark said. Holmes called the map "Obama's map."

"What you have here is a map that will be a good thing for the state. I don't know if you should take a Council opinion. This did not go to the Commission. I am fairly sure the redistricting is good and will be a good thing for the state."

Redistricting: What do Democrats say on issue?

GOVERNMENT: New maps added to mix; Dems say Justice Dept. won't approve any of them

Editor's note: This is the second part of a two-part series on county commissioners' views on the redistricting process because the court cut a deal. Today, the Democratic minority on the court expresses its views, while the Republicans is featured in Monday's edition.

By J.J. AULDS
The Daily News

Outside of County Commissioners Ken Clark, the most involved county commit-

tee during the redistricting process has been Stephen Holmes, the Democrat who represents Precinct 2. Holmes and Clark are the only commissioners on the court

who were part of the last redistricting process.

Reports obtained by The Daily News through an open

See REDISTRICTING/33

Two more redistricting map proposals make the scene

GOVERNMENT:
JONES REQUITS
 Jones quit his job as county judge to run for state office. He is running for the 11th district seat in the 2012 election.

11th JUDGES
 The 11th district judges are: ...

... of the public health ...

At a glance
 ...

Y, AUGUST 17, 2011

GALVESTON COUNTY, TEXAS

PLANS

Continued from Page A1

Proponent of the consolidation point to cost savings that would result in fewer judges and staff.

County Judge Mark Henry did a cost analysis that estimates as much as a \$172 million annual savings.

Others, including conservative activist and blogger Todd Kinsey of League City, said many of the courts have light case loads and do not generate as much revenue as other courts.

Justice of the Peace Precinct 2 Judge Percy Pope, a Democrat, heard 446 cases in 2009, June 20 of this year, he had managed 226 cases.

By comparison, Justice of the Peace Precinct 7 Mark Foster, a Republican, managed 6,848 cases in 2009, 6,016 cases in 2010 and through June of this year had handled 3,222.

Foster said he believes a court should be judged on issues other than case load and money. "I don't get elected 13 years ago to make the county money," he said. "I got elected to bring a level playing field to the court system ... (Judges are not) up there to collect money. We are there to serve justice."

Like all success Precinct 1 Justice of the Peace Jim Schweitzer, a Democrat, said combining offices would create a burden on those who lack transportation.

"Whether you have a JP office here on the island or over in La Marque ... there really is no public transportation," Schweitzer said.

He said people feeling to pay or dispute traffic citation fines or to have their side heard in eviction proceedings or small claims lawsuits would have less access to a court.

"You take evictions (cases) from Galveston Island -- the people get rides of ten times from the apartment complexes because they don't have a car," he said.

Henry shot back that any consolidation plan likely would include having the judges have dual offices in communities within the precinct to make access easier. Adiffel said, since JP courts handle the bulk of

price cases, the consolidation of precincts would put a strain on officers to keep students in school.

Hopkins v. Hanna But the biggest hurdle for uniting the precincts might be the federal government.

The county drew up the plan in 1992 after being sued over the districts the county had that plaintiffs claimed diluted their voting strength. The lawsuit, Hopkins v. Hanna, resulted in the creation of Precincts 2 and 3 through an agreed order.

Attempts by the commissioners to trim just one precinct in 2001 met with strong opposition from both political parties, and eventually a federal court judge ordered the county to keep the precincts.

Eventually, the Hopkins v. Hanna case was made part of the resolution for the county's 2001 redistricting effort. Pope declined to comment on the latest redistricting battle, while Precinct 3 Justice of the Peace Sandy James said he'd be reached for comment.

Precinct 3 County Commissioner Stephen Hansen, who introduced his own map for justices of the peace and courts that keeps the status quo, said the county needs to look hard at the federal agreement before tinkering with the precinct lines again.

"We don't want to draw lines that the (U.S.) Department of Justice will kick out," he said. "That's why we need to play with what we have because we know that's what has already met the standards of federal law."

After public hearings Monday and Tuesday in League City and Suisun, there are three public hearings remaining on the proposed redistricting map, including one tonight in Crystal Beach and next week in Texas City and Galveston.

Mailbox Editor T.J. Aids can be reached at 409-693-8334 or tjaidso@galveston.com.

Exhibit H

THE GALVESTON COUNTY COMMISSIONERS COURT
WILL CONDUCT PUBLIC HEARINGS ON THE
2011 REDISTRICTING PROCESS OF
COUNTY COMMISSIONER AND JUSTICE OF THE PEACE
PRECINCTS
AS FOLLOWS:

MONDAY	AUGUST 15, 2011 7:00 p.m.	CALDER ROAD ANNEX 174 Calder Road League City, Texas 77573
TUESDAY	AUGUST 16, 2011 6:00 p.m.	WEST COUNTY ANNEX 11730 State Hwy. 6 Santa Fe, Texas 77510
MONDAY	AUGUST 22, 2011 7:00 p.m.	NESSLER CENTER 2010 Fifth Avenue North Texas City, Texas 77590
TUESDAY	AUGUST 23, 2011 7:00 p.m.	GALVESTON COUNTY COURTHOUSE 722 Moody Galveston, Texas 77550

THE GALVESTON COUNTY COMMISSIONERS COURT
WILL CONDUCT PUBLIC HEARINGS ON THE
2011 REDISTRICTING PROCESS OF
COUNTY COMMISSIONER AND JUSTICE OF THE PEACE
PRECINCTS

AS FOLLOWS:

WEDNESDAY

AUGUST 17, 2011
6:00 p.m.

CRYSTAL BEACH ANNEX
JP Court, Precinct 6
946 Noble Carl Road
Crystal Beach, Texas 77650

**GALVESTON COUNTY COMMISSIONERS COURT
GALVESTON COUNTY COURTHOUSE
722 MOODY (FIRST FLOOR) - GALVESTON
AUGUST 2, 2011 – 1:00 P.M.**

CONSENT AGENDA: ALL ITEMS MARKED WITH A SINGLE ASTERISK (*) ARE PART OF THE CONSENT AGENDA AND REQUIRE NO DELIBERATION BY THE COMMISSIONERS COURT. ANY COMMISSIONERS' COURT MEMBER MAY REMOVE AN ITEM FROM THIS AGENDA TO BE CONSIDERED SEPARATELY. *APPEARANCES:* SHOULD ANYONE WISH TO ADDRESS THE COMMISSIONERS COURT ON A SPECIFIC ITEM, PLEASE ARRIVE PRIOR TO THE MEETING AND SIGN IN WITH THE COUNTY CLERK. COMMENTS ARE LIMITED TO 5 MINUTES.

REGULARLY SCHEDULED MEETING –AGENDA- 1:00 P.M.

Pledge of Allegiance and Invocation

***1. Submitted by County Auditor's Office:**

- a. Approval of Accounts Payable checks dated 8/2/11.
- b. Orders for supplemental payroll period ending 7/20/11 Bi-weekly #15.
- c. District Clerk's Conversion Review as of March 14, 2011.

*2. Consideration of Resolution *Petitioning the Secretary of State for Galveston County's participation in the Countywide Polling Place Program* in November 2011, pursuant to §43.007 of the Texas Election Code submitted by County Clerk.

*3. Receive and file *Juror Donation Plan – Selection of Participants*, submitted by Justice Administration.

*4. Receive and File *Letter of Engagement from Null-Lairson, P.C.*.

*5. Receive and File *Galveston County Emergency Communication District FY 2010 Annual Audit and Report*.

*6. Receive and File *Galveston County Health District's Compliance Audit for the Jail Health Contract*.

*7. Consideration of *Road and Alley Abandonments - Old Algoa Townsite* submitted by Right of Way.

*8. Consideration of *Trade Agreement on Ginger Street, L'Hommedieu Survey* submitted by Right of Way.

*9. Consideration of *Resolution of Congratulations to the Galveston County 4-H State Beef Quiz Bowl Champions* submitted by Commissioner Ken Clark.

10. Consideration of request for waiver or refund of Tax Penalty and Interest of the following submitted by Assessor and Collector of Taxes:

- a. Account No.: 3204-0000-0607-000 Emerald Galveston Holdings, LLC
- b. Account No.: 3267-0000-0261-000 Harbour Classic Builders, LLC

c. Account No.: 4939-0000-0225-000 Maravilla Owners Association

11. Discuss and consider approval of a preliminary plan for County Commissioners, Justices of the Peace and the Constables Precinct Boundaries for the purpose of redistricting related to the 2010 Census submitted by County Judge.

12. Consideration of change order no. 1 to the R.W. Lucas Construction, LLC contract for the Galveston County Road Extensions for Various Roads in the Bacliff and San Leon projects submitted by the County Engineer.

13. Consideration of an agreement with Union Pacific Railroad Company to fund modifications to the rail crossing for the Deats Road project submitted by the County Engineer.

14. Consideration of additional services authorization for Jacobs Engineering on the Mid-County Annex submitted by the County Architect.

15. Consideration of authorization for additional services on the design phase of the Senior Center by Jacobs Engineering and the termination of their contract upon completion of that phase submitted by the County Architect.

16. Consideration of permission to finish Senior Center project in house with Contract Services of Architect, Mike Steffey, submitted by the County Architect

17. Consider recommending awarding contracts on the following Bids submitted by the Purchasing Agent.

- a. Bid #B111037 Hughes Road Reconstruction
- b. Bid #B111047 City of Bayou Vista, Ling Street Rehabilitation

18. Consideration to cancel and authorize the Purchasing Agent to re-bid the following bid submitted by the Purchasing Agent.

- a. Bid #B112024 Sale of Recyclable Products

19. Consider recommending awarding a contract on the following RFP submitted by the Purchasing Agent.

- a. RFP #B112019 Lockbox Services for Galveston County

20. Consideration of Budget Amendments submitted by the Budget Officer.

Fiscal Year	Amendment #	Description
2011	11-112-0802-A	Juvenile Justice – Budget request for three exemptions to the hiring freeze – Juvenile Justice

Officers – Positions #2561180044, #2561190023
and #2561190034.

- | | | |
|------|---------------|--|
| 2011 | 11-113-0802-B | Unlimited Tax Road Bonds, Series 2009A – Request to budget Change Order No. 1 – R.W. Lucas – transfer funds from Caroline to roads – Precinct #1. |
| 2011 | 11-114-0802-C | Constable Precinct #7 – Budget request for an exemption to the hiring freeze – Deputy Constable – Position - #2237000002. |

21. Consideration of Appointment of a Deputy as submitted by Constable, Precinct Number 7.
22. Consideration of authorizing the County Judge to execute Memorandum of Understanding with the U.S. Coast Guard regarding augmentation of the Galveston County Emergency Operations Center during emergencies submitted by the Emergency Management Coordinator.
23. Consideration of Hurricane Ike items:
 - a. Consideration of authorizing execution of Amended Contracts for Sale under the Hazard Mitigation Grant Program submitted by the Emergency Management Coordinator.
 - b. Update on Housing Program submitted by Director of Housing.

**WORKSHOP WILL BEGIN IMMEDIATELY AFTER COMMISSIONERS
COURT ADJOURNS**

WORKSHOP AGENDA

1. Discuss Bond Refinance presented by Louis E. Pauls and associates.

Exhibit I

MINUTES

BE IT REMEMBERED, That on this 2nd day of August, 2011, Commissioners Court of Galveston County, Texas, met at a regular meeting with the following present:

MARK HENRY	COUNTY JUDGE
PATRICK F. DOYLE	COMMISSIONER PRECINCT 1
KEVID D. O'BRIEN	COMMISSIONER PRECINCT 2
STEPHEN D. HOLMES	COMMISSIONER PRECINCT 3
KENNETH D. CLARK	COMMISSIONER PRECINCT 4
DWIGHT D. SULLIVAN	COUNTY CLERK
By Brandy Chapman, Chief Deputy	

Attendees Present: County Auditor Cliff Billingsley; Attorney for the Court Harvey Bazaman.

CALL TO ORDER

Call to Order by Judge Henry at 1:03 P.M. at the Galveston County Courthouse.

PLEDGE OF ALLEGIANCE

Commissioner Doyle led the Court in the Pledge of Allegiance.

INVOCATION

The Invocation was given by Commissioner Holmes.

CONSENT AGENDA IEMS 1-9

*1. Submitted by County Auditor's Office:

- a. Approval of Accounts Payable checks dated 8/2/11.
- b. Orders for supplemental payroll period ending 7/20/11 Bi-weekly #15.
- c. District Clerk's Conversion Review as of March 14, 2011.

*2. Consideration of Resolution *Petitioning the Secretary of State for Galveston County's participation in the Countywide Polling Place Program* in November 2011, pursuant to §43.007 of the Texas Election Code submitted by County Clerk.

*3. Receive and file Juror Donation Plan – *Selection of Participants*, submitted by Justice Administration.

*4. Receive and File *Letter of Engagement from Null-Lairson, P.C.*

*5. Receive and File *Galveston County Emergency Communication District FY 2010 Annual Audit and Report.*

*6. Receive and File *Galveston County Health District's Compliance Audit for the Jail Health Contract.*

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to approve consent agenda item 6.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

*7. Consideration of *Road and Alley Abandonments – Old Algoa Townsite* submitted by Right of Way.

*8. Consideration of *Trade Agreement on Ginger Street, L'Hommedieu Survey* submitted by Right of Way.

*9. Consideration of *Resolution of Congratulations to the Galveston County 4-H State Beef Quiz Bowl Champions* submitted by Commissioner Ken Clark.

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to approve consent agenda items 1-2, 4, 5, 7-9. Agenda item 3 pulled. Agenda item 6 voted separately.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

10. Consideration of request for waiver of refund of Tax Penalty and Interest of the following submitted by Assessor and Collector of Taxes:

a. Account No.: 3204-0000-0607-000 Emerald Galveston Holdings, LLC

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and carried (4-1), it is ordered to approve request by Emerald Galveston Holdings, LLC to waive/refund penalty, interest, and attorney fees for Account No. 3204-0000-0607-000.

Judge Henry	Yes
Commissioner Doyle	No
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

Motion to reconsider by Commissioner Holmes, seconded by County Judge Henry

Duly put and unanimously carried (5-0), it is ordered to reconsider request by Emerald Galveston Holdings, LLC to waive/refund penalty, interest, and attorney fees for Account No. 3204-0000-0607-000.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

Motion by County Judge Henry, seconded by Commissioner Holmes

Duly put and unanimously carried (5-0), it is ordered to deny request by Emerald Galveston Holdings, LLC to waive/refund penalty, interest, and attorney fees for Account No. 3204-0000-0607-000.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

b. Account No.: 3267-0000-0261-000 Harbour Classic Builders, LLC

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to deny request by Harbour Classic Builders, LLC to refund penalty and interest for Account No. 3267-0000-0261-000.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

c. Account No.: 4939-0000-0225-000 Maravilla Owners Association

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to approve request by Maravilla Owners Association to waive penalty and interest for Account No. 4939-0000-0225-000.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

11. Discuss and consider approval of a preliminary plan for County Commissioners, Justices of the Peace and the Constables Precinct Boundaries for the purpose of redistricting related to the 2010 Census submitted by County Judge.

No action taken.

12. Consideration of change order no. 1 to the R.W. Lucas Construction, LLC contract for the Galveston County Road Extensions for Various Roads in the Bacliff and San Leon projects submitted by the County Engineer.

Motion by Commissioner O'Brien, seconded by County Judge Henry

Duly put and unanimously carried (5-0), it is ordered to approve change order no. 1 to the R.W. Lucas Construction, LLC contract for the Galveston County Road Extensions for Various Roads in the Bacliff and San Leon projects.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

13. Consideration of an agreement with Union Pacific Railroad Company to fund modifications to the rail crossing for the Deats Road project submitted by the County Engineer.

Motion by Commissioner Holmes, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to approve an agreement with Union Pacific Railroad Company to fund modifications to the rail crossing for the Deats Road project.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

14. Consideration of additional services authorization for Jacobs Engineering on the Mid-County Annex submitted by the County Architect.

Motion by Commissioner Holmes, seconded by Commissioner Doyle

Duly put and unanimously carried (5-0), it is ordered to approve additional services authorization for Jacobs Engineering on the Mid-County Annex.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

15. Consideration of authorization for additional services on the design phase of the Senior Center by Jacobs Engineering and the termination of their contract upon completion of that phase submitted by the County Architect.

Motion by County Judge Henry, seconded by Commissioner Clark

Duly put and unanimously carried (5-0), it is ordered to defer item 15.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

16. Consideration of permission to finish Senior Center project in house with Contract Services of Architect, Mike Steffey, submitted by the County Architect.

Motion by County Judge Henry, seconded by Commissioner Clark

Duly put and unanimously carried (5-0), it is ordered to defer item 16.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

17. Consider recommending awarding contracts on the following Bids submitted by the Purchasing Agent.

a. Bid #B111037 Hughes Road Reconstruction

Motion by Commissioner Holmes, seconded by Commissioner Doyle

Duly put and unanimously carried (5-0), it is ordered to approve the award of contract for Bid #B111037 for Hughes Road Reconstruction to R. W. Lucas Construction, LLC, as recommended.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

b. Bid #B111047 City of Bayou Vista, Ling Street Rehabilitation

Motion by Commissioner O'Brien, seconded by County Judge Henry

Duly put and unanimously carried (5-0), it is ordered to approve award of contract for Bid #B111047 for City of Bayou Vista, Ling Street Rehabilitation to Mullen Asphalt Paving Company, Inc., as recommended.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

18. Consideration to cancel and authorize the Purchasing Agent to re-bid the following bid submitted by the Purchasing Agent.

a. Bid #B112024 Sale of Recyclable Products

Motion by Commissioner O'Brien, seconded by County Judge Henry

Duly put and unanimously carried (5-0), it is ordered to cancel Bid #B112024 for Sale of Recyclable Products and the Purchasing Agent is authorized to re-bid.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

19. Consider recommending awarding a contract on the following RFP submitted by the Purchasing Agent.

a. RFP #B112019 Lockbox Services for Galveston County of Galveston

Motion by County Judge Henry to defer item 19a.

20. Consideration of Budget Amendments submitted by the Budget Officer.

Fiscal Year	Amendment #	Description
2011	11-112-0802-A	Juvenile Justice – Budget request for three exemptions to the hiring freeze – Juvenile Justice Officers – Positions #2561180044, #2561190023 and #2561190034.

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to approve the Budget Amendment for Juvenile Justice for three Exemptions to the hiring freeze for Juvenile Justice Officers, Positions #2561180044, #2561190023 and #2561190034.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

2011	11-113-0802-B	Unlimited Tax Road Bonds, Series 2009A – Request to budget Change Order No. 1 – R.W. Lucas – transfer funds from Caroline to roads – Precinct #1.
------	---------------	---

Motion by Commissioner Holmes, seconded by County Judge Henry

Duly put and unanimously carried (5-0), it is ordered to approve the Budget Amendment for Unlimited Tax Road Bonds, Series 2009A to budget Change Order No. 1 for R.W. Lucas to transfer funds from Caroline to roads in Precinct #1.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

2011 11-114-0802-C Constable Precinct #7 – Budget request for an exemption to the hiring freeze -- Deputy Constable – Position - #2237000002.

Motion by Commissioner Doyle, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to approve the Budget Amendment for Constable Precinct #7 for an exemption to the hiring freeze for Deputy Constable, Position #2237000002.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

21. Consideration of Appointment of a Deputy as submitted by Constable, Precinct Number 7.

Motion by County Judge Henry to defer item 21.

22. Consideration of authorizing the County Judge to execute Memorandum of Understanding with the U.S. Coast Guard regarding augmentation of the Galveston County Emergency Operations Center during emergencies submitted by the Emergency Management Coordinator.

Motion by Commissioner O'Brien, seconded by County Judge Henry

Duly put and unanimously carried (5-0), it is ordered to authorize the County Judge to execute a Memorandum of Understanding with the U.S. Coast Guard regarding augmentation of the Galveston County Emergency Operations Center during emergencies.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

23. Consideration of Hurricane Ike items:

- a. Consideration of authorizing execution of Amended Contracts for Sale under the Hazard Mitigation Grant Program submitted by the Emergency Management Coordinator.

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and carried (4-0-1), it is ordered to authorize execution of Amended Contracts for Sale under the Hazard Mitigation Grant Program.

Judge Henry	Yes
Commissioner Doyle	Abstain
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

- b. Update on Housing Program submitted by Director of Housing.

No action taken.

Commissioners Court adjourned at 2:35 p.m. on Tuesday, August 2, 2011.

WORKSHOP WILL BEGIN IMMEDIATELY AFTER COMMISSIONERS COURT ADJOURNS

WORKSHOP AGENDA

- I. Discuss Bond Refinance presented by Louis E. Pauls and associates.

SPEAK

MEETING DATE 8/15/11

SIGNATURE

PRINTED NAME

Jim Woltz

Jim Woltz ✓✓

Trish Hanks

TRISH HANKS ✓✓

Bill C. Provenzano

BILL PROVENZANO ✓✓

Diana B. Bork

Diana Bork ✓✓

Richard Meinecke

Richard Meinecke ✓✓

David Brown

David Brown ✓✓

Rusty Cates

Rusty Cates ✓✓

Tommy Frankovich

Tommy Frankovich ✓✓

Barbara Meeks

Barbara Meeks ✓✓

Neil Baron

Neil BARON ✓✓

Louis Decker

Speaking

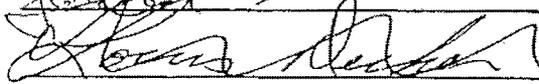
MEETING DATE 8/16/11

SIGNATURE

PRINTED NAME



Gerhard Meinertke



Ken Decker



Rusty Cates

Mike Burkhardt

JP5 - Darrell Apffel

Derrick Rose, Constable Pct 3

Don Cherry, Constable Pct 1

Johnny Hollowell

Jimmy Fullen, Constable Pct 4

David Floyd

Louis Deaker

JP4 - Mike Nelson

Terry Petteway, Constable Pct 2

Neil Baron

Speaking

MEETING DATE 8/17/11

SIGNATURE	PRINTED NAME
CYNTHIA SRADER ✓	
Anne Willis ✓ ✓	
Judge Pat Vondra ✓ ✓	
PAULA DISERELLE ✓	Margo Johnson
PAULA ✓	Jacqueline Cook
Jim Vondra ✓ ✓	
LARRY FLANAGAN ✓ ✓	
DONNY BOUSE ✓ ✓	
DONALD MAUET ✓ ✓	
CHRIS PIERCE ✓	
GEORGE STRONG ✓	
STAN SCHUBERT ✓	
KAREN SCHUBERT ✓	
CYNTHIA SRADER ✓	
LORI LYKOS ✓	
MICHAEL LYKOS ✓	
PAULA MASSARELLI ✓	
RUB NESS ✓	Deanna ?
CHARIOTE VISE ✓	EDWIN SMITH ✓
BUD ATWOOD ✓	RANDY RAPP ✓
BRUCE FARRARD ✓	WAT PRODANOV ✓
DONNY BOUSE ✓	Brad Kratis ✓
	Conetaha Comeaux ✓

Speaking

0

MEETING DATE 9/22/11

SIGNATURE	PRINTED NAME
<u>Janis Lowe</u>	<u>Janis Lowe</u> ✓ ✓
<u>Barbara Meeks</u>	<u>Barbara Meeks</u> ✓ ✓
<u>Sarah Von Draw</u>	<u>SARAH VON DRAW</u> ✓ ✓
<u>Chris Kinard</u>	<u>Chris Kinard</u> ✓ ✓
<u>Malinda Garcia</u>	<u>Malinda Garcia</u> ✓ ✓
<u>Alex Garcia</u>	<u>Alex Garcia</u> ✓ ✓
<u>Barbara White</u>	<u>Barbara White</u> ✓ ✓
<u>Stanna Trochost</u>	<u>Stanna Trochost</u> ✓ ✓
<u>Kathy Rogers</u>	<u>Kathy Rogers</u> ✓ ✓
<u>Phil Roberts</u>	<u>Phil Roberts</u> ✓ ✓
<u>Gerhard Heiser</u>	<u>Gerhard Heiser</u> ✓ ✓
<u>Paula Smith</u>	<u>Paula Smith</u> ✓ ✓
<u>Mike Smith</u>	<u>Mike Smith</u> ✓ ✓
<u>Jannic Kranz</u>	<u>Jannic Kranz</u> ✓ ✓
<u>Bruce Woodcock</u>	<u>BRUCE WOODCOCK</u> ✓ ✓
<u>Monica Millican</u>	<u>Monica Millican</u> ✓ ✓
Barbara Meeks	BARBARA MECKS ✓ ✓
<u>Todd Kinsey</u>	<u>TODD KINSEY</u> ✓ ✓

(2)

MEETING DATE 8/22/11

SIGNATURE	PRINTED NAME
<i>DOREEN Hughes</i>	DOREEN HUGHES ✓
<i>Susan Myers</i>	Susan Myers ✓
<i>Richard Batie</i>	Richard Batie ✓
<i>Darrell A. Appfel</i>	DARRELL A. APFFEL ✓
<i>Shawn Batie</i>	Shawn Batie ✓
<i>Jack CROSS</i>	JACK CRUGS ✓
<i>K.C. Broyles</i>	Keuneth C Broyles ✓
<i>CAELOS GAZZIA</i>	CAELOS GAZZIA ✓
<i>[Signature]</i>	MATT DOYLE ✓
<i>Charles E. Doyle</i>	Charles E. Doyle ✓
<i>Heidi Thress</i>	Heidi Thress ✓
<i>Dee Ann Honey</i>	Dee Ann Honey ✓
<i>LARRY SCHUMACHER</i>	LARRY SCHUMACHER ✓
<i>Bob Senter</i>	BOB SENTER ✓
<i>Jenny Senter</i>	JENNY SENTER ✓
<i>GERI Bentley</i>	GERI BENTLEY ✓
<i>Carole Alexander</i>	Carole Alexander ✓
<i>Carol Dean</i>	Carol Dean ✓

(3)

MEETING DATE 8/22/11

SIGNATURE	PRINTED NAME		
	Patricia V. Grady	✓	✓
	Brenda Guerrero	✓	✓
	Roxann Lewis	✓	✓
	JOEL J. CALDWELL	✓	✓
	DAN KRIEGER	✓	✓
	Rusty Cates	✓	✓
	Randy Ryan Dennard	✓	✓
	Diane Y. Merchant	✓	✓
	Geraldine Sam	✓	✓
	Lupu Cantu	✓	✓
	STANLEY E. BROWN	✓	✓
	JAMES HORGOOD	✓	✓
	Derick D. Johnson		
	Robert Hutchins	✓	✓
DERICK JOHNSON		✓	✓
	BECKY LITTLE	✓	✓
	Chris Stevens	✓	✓
	Leon Phillip	✓	✓

①

Speaking

MEETING DATE 8/23/11

SIGNATURE	PRINTED NAME		
<u>Carol Dean</u>	<u>Carol Dean</u>	✓	✓
<u>Casey FARRIS</u>	<u>Casey Farris</u>	✓	✓
<u>HENRY GOMER</u>	<u>Henry Gomer</u>	✓	✓
<u>Linda Tuttle</u>	<u>SANDRA TETLEY</u>	✓	✓
<u>Alison Putman</u>	<u>Alison Putman</u>	✓	✓
<u>Barbara Meeks</u>	<u>BARBARA MEERS</u>	✓	✓
<u>Richard Batie</u>	<u>Richard Batie</u>	✓	✓
<u>K. Pe</u>	<u>Karen Lewis</u>	✓	✓
<u>Mike</u>	<u>MIKE SMITH</u>	✓	✓
<u>G. Heineckov</u>	<u>G. Heineckov</u>	✓	✓
<u>Karla Smith</u>	<u>Karla Smith</u>	✓	✓
<u>Carolyn Sunseri</u>	<u>Carolyn Sunseri</u>	✓	✓
<u>Joe Compian</u>	<u>JOE COMPIAN</u>	✓	✓
<u>James Horgan</u>	<u>JAMES HORGAN</u>	✓	✓
<u>LINDA Burton</u>	<u>Linda Burton</u>	✓	✓
<u>RON DAILY</u>	<u>Ron Daily</u>	✓	✓
<u>Lloyd Criss</u>	<u>Lloyd Criss</u>	✓	✓
<u>Penny L. Pope</u>	<u>Penny L. Pope</u>	✓	✓

(4)

MEETING DATE 8/23/11

SIGNATURE

PRINTED NAME

Rev. James Daniels

Rev. James Daniels ✓

Chris Stevens

Chris Stevens ✓

Joseph Joe Saworski

Joseph Joe Saworski ✓

John Gay

John Gay ✓

Leon Phillips II

Leon Phillips II ✓

(1)

Blank lined area for additional signatures and names.

MINUTES

BE IT REMEMBERED, That on this 30th day of August, 2011, Commissioners Court of Galveston County, Texas, met at a regular meeting with the following present:

MARK HENRY	COUNTY JUDGE
PATRICK F. DOYLE	COMMISSIONER PRECINCT 1
KEVID D. O'BRIEN	COMMISSIONER PRECINCT 2
STEPHEN D. HOLMES	COMMISSIONER PRECINCT 3
KENNETH D. CLARK	COMMISSIONER PRECINCT 4
DWIGHT D. SULLIVAN	COUNTY CLERK

Attendees Present: County Auditor Cliff Billingsley; Attorney for the Court Harvey Bazaman.

CALL TO ORDER

Call to Order by Judge Henry at 1:02 P.M. at the Galveston County Courthouse.

PLEDGE OF ALLEGIANCE

Commissioner O'Brien led the Court in the Pledge of Allegiance.

INVOCATION

The Invocation was given by Commissioner Holmes.

CONSENT AGENDA ITEMS 1-13

- *1. Submitted by County Auditor's Office:
 - a. Approval of Accounts Payable checks dated 8/30/11.
 - b. Orders for payroll period ending 8/17/11 Bi-weekly #17.
 - c. GASB 54 fund balance policy.

- *2. Approval of Summary of *Bi-Weekly Personnel Movements* processed during pay period 17; August 4 thru August 17, 2011 as submitted by Human Resources.

- *3. Consideration of authorizing the *County Judge to sign a Resale Deed on a Tax Foreclosed Property* submitted by Right of Way.

- *4. Receive and file *TCEQ Scrap Tire Facility Registration packet*.
- *5. Receive and file *Notice of Change in Contract Administration for the Community Development Block Grant Disaster Recovery Program* submitted by the Grants Manager.
- *6. Receive and file *Notice of Recovery for Damages to County Vehicle* in the amount of \$1,428.80 submitted by County Legal.
- *7. Receive and file *Notice of Payment Receipt and Approval of Release of Lien; 964 Clara, Crystal Beach, Texas* submitted by County Legal.
- *8. Consideration of *Approval of Proposed Settlement of Property Damage Claim* made by Larry Kraft submitted by County Legal.
- *9. Consideration of *Adoption of Annually Determined Contribution Rate for TCDRS at its Current Rate for Calendar Year 2012* submitted by County Legal.
- *10. Consideration of *Authorization for the Department of Social Services to make Reimbursement to the Accounts of Certain Wards in the County Guardianship Program* in accordance with the requirements of the Social Security Administration submitted by the County Legal.
- *11. Consideration of extension of the existing lease for record storage with Ross Novelli, Jr. for a period of one year beginning 8/15/2011 through 8/14/2012 submitted by County Legal.
- *12. Consideration of assessment of improper wages and penalties under Texas Gov't Ch. 2258 submitted by Wage Compliance Officer.
 - a. AV Adek – Galveston County Animal Shelter
 - b. Total Cabinets – Galveston County Animal Shelter

*13. Consideration and Consent of *Refunds in Excess of \$2,500* submitted by Assessor and Collector of Taxes:

Account Number	Amount	Reason
1505-0000-0009-000	\$ 6,041.62	Overpayment
3015-0042-0000-005	\$ 4,783.34	Overpayment
5287-0000-0426-000	\$ 2,863.09	Overpayment
5742-0000-0001-000	\$ 4,845.69	Overpayment
4918-0002-0020-000	\$ 3,000.00	Overpayment
5305-0001-0002-000	\$ 3,386.71	Overpayment
1435-0000-0001-000	\$ 4,734.00	Overpayment
2445-0001-0015-000	\$ 4,877.24	Overpayment
2845-0002-0006-000	\$ 3,972.12	Overpayment
6391-0000-0028-000	\$ 7,967.26	Overpayment

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to approve consent agenda items 1-13.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

14. Consideration of request for waiver or refund of penalty and interest of the following accounts submitted by Assessor and Collector of Taxes:

- | | |
|---|--------------|
| a. Account No.: 6240-0110-0015-000 (2010) | Karen Mendez |
| b. Account No.: 6240-0110-0015-000 (2009) | Karen Mendez |
| c. Account No.: 6240-0110-0015-000 (2008) | Karen Mendez |
| d. Account No.: 6240-0110-0015-000 (2007) | Karen Mendez |
| e. Account No.: 6240-0110-0015-000 (2006) | Karen Mendez |

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to deny request by Karen Mendez to refund penalty and interest for Account No. 6240-0110-0015-000.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

- f. Account No.: 4483-0002-0020-000 C. Wrenn Downey
- g. Account No.: 7206-0000-0289-011 C. Wrenn Downey
- h. Account No.: 7206-0000-0289-012 C. Wrenn Downey
- i. Account No.: 6868-0002-0064-000 C. Wrenn Downey
- j. Account No.: 2775-0010-2213-001 C. Wrenn Downey
- k. Account No.: 8600-0404-8533-001 C. Wrenn Downey
- l. Account No.: 8600-0441-8739-000 C. Wrenn Downey
- m. Account No.: 3405-0000-0012-001 C. Wrenn Downey

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to deny request by C. Wrenn Downey to refund penalty and interest for the above account numbers.

- Judge Henry Yes
- Commissioner Doyle Yes
- Commissioner O'Brien Yes
- Commissioner Holmes Yes
- Commissioner Clark Yes

- n. Account No.: 4880-0003-0009-000 (2006) Scanlon 1998 Family Trust
- o. Account No.: 4880-0003-0009-000 (2007) Scanlon 1998 Family Trust

Motion by County Judge Henry to defer item 14n and 14o.

- p. Account No.: 6391-0000-0091-001 Thomas C. Collins

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to deny request by Thomas C. Collins to waive penalty and interest for Account No. 6391-0000-0091-001.

- Judge Henry Yes
- Commissioner Doyle Yes
- Commissioner O'Brien Yes
- Commissioner Holmes Yes
- Commissioner Clark Yes

q. Account No.: 5911-0003-0018-000 (2010) Dang Peter & Phuc Nguyen
 r. Account No.: 5911-0003-0018-000 (2009) Dang Peter & Phuc Nguyen

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to deny request by Dang Peter and Phuc Nguyen to waive penalty and interest for Account No. 5911-0003-0018-000.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

15. Consideration of Budget Amendment as submitted by the Budget Officer:

Fiscal Year	Amendment #	Description
2011	11-129-0830-B	Juvenile Justice – Budget request for one exemption to the hiring freeze and an exemption to the four pay period vacancy requirement– Juvenile Justice Officer – 2561190040.

Motion by Commissioner Holmes, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to approve the Budget Amendment for Juvenile Justice for one exemption to the hiring freeze and an exemption to the four pay period vacancy requirement for Juvenile Justice Officer, 2561190040.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

Motion by Commissioner Holmes, seconded by Commissioner Doyle to take items 23-26 out of order.

Duly put and unanimously carried (5-0), it is ordered to move to item 23.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

16. Public Hearing on Proposed FY 2012 County Budget.

Public Hearing was opened at 2:26 P.M.
Public hearing held.
No public comments.
Public Hearing was closed at 2:26 P.M.
No Action Taken.

17. Adoption of the FY 2012 County Budget and establishment of budget reserves submitted by the Budget Officer.

Motion by County Judge Henry, seconded by Commissioner O'Brien to adopt the budget.

Amended motion by Commissioner Doyle, seconded by Commissioner Holmes to amend budget to reduce the tax rate, which can be confirmed by the Budget Officer, by 4 1/2¢ that will deplete the indigent health care fund and bring us back to a revenue generated to expenses generated, as we have been in the past and should be, and let those funds go back to the taxpayers as we promised two years ago.

Amended motion failed (2-3) to amend budget to reduce the tax rate, which can be confirmed by the Budget Officer, by 4 1/2¢ that will deplete the indigent health care fund and bring us back to a revenue generated to expenses generated, as we have been in the past and should be, and let those funds go back to the taxpayers as we promised two years ago.

Judge Henry	No
Commissioner Doyle	Yes
Commissioner O'Brien	No
Commissioner Holmes	Yes
Commissioner Clark	No

Amended motion by Commissioner Doyle, seconded by Commissioner Holmes to amend budget to cut all auto allowances for the Commissioners and cut all elected official's salaries by 5%.

Amended motion failed (2-3) to amend budget to cut all auto allowances for Commissioners and cut all elected official's salaries by 5%.

Judge Henry	No
Commissioner Doyle	Yes
Commissioner O'Brien	No
Commissioner Holmes	Yes
Commissioner Clark	No

Amended motion by Commissioner Doyle, seconded by Commissioner Holmes to amend budget to cut all auto allowances for Commissioners and 5% pay cut to all County Commissioners and County Judge.

Duly put and carried (4-1), it is ordered to amend budget to cut all auto allowances for Commissioners and 5% pay cut to all County Commissioners and County Judge.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	No
Commissioner Holmes	Yes
Commissioner Clark	Yes

Motion by County Judge Henry, seconded by Commissioner O'Brien to approve budget as amended.

Motion failed (2-3), to approve the budget with amendments.

Judge Henry	Yes
Commissioner Doyle	No
Commissioner O'Brien	No
Commissioner Holmes	No
Commissioner Clark	Yes

Motion by Commissioner Clark, seconded by Commissioner O'Brien to reconsider the previous motion to approve budget as presented.

Duly put and unanimously carried (5-0), it is ordered to reconsider the previous motion to approve budget as presented.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

Motion by Commissioner Doyle to approve the budget with sole amendment for a 5% pay cut for County Judge and Commissioners and cut all auto allowances for Commissioners and County Judge.

Motion withdrawn by Commissioner Doyle.

Motion by Commissioner Clark, seconded by Commissioner Doyle to approve budget with an across the board salary cut of 5% for all elected officials with the 5% for District Judges coming from the county portion of their salary and eliminate all Commissioners and County Judge's auto allowance.

Amendment to motion by Commissioner Clark, seconded by Commissioner O'Brien to cut positions 2 and 3 from the Road and Bridge Department.

Duly put and carried (3-2), it is ordered to approve amendment to motion to cut positions 2 and 3 from the Road and Bridge Department.

Judge Henry	Yes
Commissioner Doyle	No
Commissioner O'Brien	Yes
Commissioner Holmes	No
Commissioner Clark	Yes

Motion by Commissioner Clark, seconded by Commissioner Doyle to approve budget with an across the board salary cut of 5% for all elected officials with the 5% for District Judges coming from the county portion of their salary and eliminate all Commissioners and County Judge's auto allowance and cut positions 2 and 3 from the Road and Bridge Department.

Motion failed (0-5) to approve budget with an across the board salary cut of 5% for all elected officials with the 5% for District Judges coming from the county portion of their salary and eliminate all Commissioners and County Judge's auto allowance and cut positions 2 and 3 from the Road and Bridge Department.

Judge Henry	No
Commissioner Doyle	No
Commissioner O'Brien	No
Commissioner Holmes	No
Commissioner Clark	No

Motion by Commissioner Doyle, seconded by Commissioner Holmes

Motion failed (2-3) to amend the budget for a one-time 3¢ tax rate reduction.

Judge Henry	No
Commissioner Doyle	Yes
Commissioner O'Brien	No
Commissioner Holmes	Yes
Commissioner Clark	No

Motion by County Judge Henry, seconded by Commissioner O'Brien to approve budget as presented.

Amended motion by Commissioner Doyle, seconded by County Judge Henry for a 5% pay reduction of County Judge and Commissioners salaries and cut County Judge and Commissioners auto allowances.

Duly put and unanimously carried (5-0), it is ordered to approve the budget with amendment for a 5% reduction of County Judge and Commissioners salaries and cut County Judge and Commissioners auto allowances.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

18. Public Hearing on the County Clerk's Proposed Records Archive Fee Established Under §118.025 and §118.011(f) of the Texas Local Government Code.

Public Hearing was opened.
Public hearing held.
No public comments.
Public Hearing was closed.
No Action Taken.

19. Consideration of Adoption of the County Clerk's proposed Records Archive Fee Established Under §118.025 and §118.011(f) of the Texas Local Government Code.

Motion by County Judge Henry, seconded by Commissioner O'Brien

Duly put and unanimously carried (5-0), it is ordered to adopt the County Clerk's proposed Records Archive Fee Established Under §118.025 and §118.011(f) of the Texas Local Government Code.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O'Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

20. Public Hearing on the District Clerk’s Proposed Records Archive Fee Established Under §51.305 of the Texas Government Code.

Public Hearing was opened.
Public hearing held.
No public comments.
Public Hearing was closed.
No Action Taken.

21. Consideration of Adoption of the District Clerk’s Proposed Records Archive Fee Established Under §51.305 of the Texas Government Code.

Motion by County Judge Henry, seconded by Commissioner O’Brien

Duly put and unanimously carried (5-0), it is ordered to adopt the District Clerk’s Proposed Records Archive Fee Established Under §51.305 of the Texas Government Code.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O’Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

22. Adoption of 2012 County Tax Rate.

Motion by County Judge Henry, seconded by Commissioner Clark

Duly put and unanimously carried (5-0), it is ordered to adopt the 2012 County Tax Rate.

Judge Henry	Yes
Commissioner Doyle	Yes
Commissioner O’Brien	Yes
Commissioner Holmes	Yes
Commissioner Clark	Yes

23. Introduce and discuss a preliminary plan for Justices of the Peace and Constables for the purpose of redistricting related to the 2010 Census submitted by County Commissioner, Pct. 2.

No Action Taken.

24. Public Comment on Commissioner and JP/Constable Redistricting Maps Proposed as a result of the 2010 Census.

Public Comments: (See DVD of hearing for comments)

Jeanie Turk addressed the Court supporting Commissioner Plan 3.

Dr. Dotti L. Jones addressed the Court supporting Commissioner Plan 3 and Constable/JP Plan 2.

Jack Cross addressed the Court supporting Commissioner Plan 3 and Constable/JP Plan 2.

Leon Phillips addressed the Court supporting Commissioner Plan 3.

Maryanne Rogers addressed the Court asking to keep the Justice of the Peace in Bolivar.

Henry Gomez addressed the Court supporting Commissioner Plan 3 and keeping all Constables/JP's.

Tim Paulissen, Mayor of League City, addressed the Court presenting City of League Resolution supporting consolidation of Constable/JP's in Plan 1 or 2.

Rev. James Daniels addressed the Court.

Dean Benford addressed the Court supporting not to reduce Constables/JP's.

David Miller, President for NAACP in Galveston, addressed the Court supporting Commissioner Plan 3.

No Action Taken.

25. Adoption of a County Commissioner Precincts redistricting map as a result of the 2010 census.

Motion by Commissioner Holmes, seconded by Commissioner Doyle

Motion failed (2-3) to adopt County Commissioner Precincts redistricting map Plan No. 3.

Judge Henry	No
Commissioner Doyle	Yes
Commissioner O'Brien	No
Commissioner Holmes	Yes
Commissioner Clark	No

Motion by Commissioner Clark, seconded by Commissioner O'Brien

Duly put and carried (3-2), it is ordered to adopt County Commissioner Precincts redistricting map Plan No. 1A and authorize the attorneys to through the approval process for D.O.J. Preclearance.

Judge Henry	Yes
Commissioner Doyle	No
Commissioner O'Brien	Yes
Commissioner Holmes	No
Commissioner Clark	Yes

26. Adoption of a Justice of the Peace/Constable Precincts redistricting map as a result of the 2010 census.

Motion by Commissioner Holmes, seconded by Commissioner Doyle

Motion failed (2-3) to adopt Justice of the Peace/Constable Precincts redistricting map Plan 2.

Judge Henry	No
Commissioner Doyle	Yes
Commissioner O'Brien	No
Commissioner Holmes	Yes
Commissioner Clark	No

Motion by County Judge Henry, seconded by Commissioner Clark

Duly put and carried (3-2), it is ordered to adopt Justice of the Peace/Constable Precincts redistricting map Plan 1.

Judge Henry	Yes
Commissioner Doyle	No
Commissioner O'Brien	Yes
Commissioner Holmes	No
Commissioner Clark	Yes

Amended motion by County Judge Henry, seconded by Commissioner Clark

Duly put and carried (3-2), it is ordered to adopt Justice of the Peace/Constable Precincts redistricting map Plan 1A and authorize the attorneys to through the approval process for D.O.J. Preclearance.

Judge Henry	No
Commissioner Doyle	Yes
Commissioner O'Brien	No
Commissioner Holmes	Yes
Commissioner Clark	No

Commissioners Court adjourned at 3:17 P.M. on Tuesday, August 30, 2011.

Exhibit

J

NOTICE OF SUBMISSION OF REDISTRICTING PLAN
TO THE DEPARTMENT OF JUSTICE

Galveston County has submitted its redistricting plan for Commissioner Precincts to the United States Department of Justice for its review under Section 5 of the Voting Rights Act, 42, USC § 1973c. A complete duplicate copy of the submission is available for public review in the Galveston County Courthouse, 722 Moody Avenue, Galveston, TX 77550. Any comments regarding the submission may be sent to:

CHIEF, VOTING SECTION
CIVIL RIGHTS DIVISION
ROOM 7254-NWB
DEPARTMENT OF JUSTICE
950 PENNSYLVANIA AVE., NW
WASHINGTON, DC 20530

Honorable Mark Henry
County Judge
Galveston County

EXHIBIT 14

November 12, 2021 Hearing Transcript Excerpt

Galveston County, Texas

COMMISSIONERS COURT SPECIAL SESSION

November 12, 2021

Available at:

<https://livestream.com/accounts/21068106/events/6315620/videos/227296657>

AUDIO TRANSCRIPTION

LENGTH OF AUDIO FILE: 1:36:31

MAGNA LEGAL SERVICES

320 West 37th Street, 12th Floor

New York, New York 10018

(866) 624-6221

Reported by: Marissa Mignano

Job Number: 876364



1 Proceedings

2 MS. MCGREW: Good evening,
3 Commissioners.

4 I stand before you as a
5 representative of the Galveston County
6 Gulf Coast Black Nurses Association. As
7 a minority, we feel that these maps are
8 very unfair and not a good
9 representation of the community as a
10 whole; therefore, we recommend that
11 neither map be accepted. And that we go
12 back to the drawing board, and that we
13 continue with the map that included
14 Commissioner Holmes.

15 Commissioner Holmes has been a
16 very good steward of the Black community
17 and all of the community, not just
18 blacks, but all of his events have been
19 well attended by everyone. They have
20 all been very inclusive of everyone, so
21 we want you all to continue to remember
22 that we are the community, all of us.
23 Black, White, yellow, green, Democrats,
24 Republicans, we all make up the
25 community. And so therefore we

1 Proceedings

2 encourage you to redraw those maps to
3 make sure that they are very inclusive
4 of the community as a whole.

5 UNKNOWN SPEAKER: Barbara Anders.

6 MS. ANDERS: Hello, I'm Barbara
7 Anders, Mainland Branch NAACP. And I
8 want to just speak to all the people
9 that came out today.

10 And, for the commissioners court,
11 we have some issues with both of these
12 maps. First of all, Map Number 1, in
13 2011, Mainland Branch NAACP went to
14 court about that map, and the problem
15 with the first map is that it includes
16 Bolivar Peninsula. Well, when the
17 Justice Department looked at that in
18 2011, they thought that wasn't a good
19 idea.

20 So what I want to know is why we
21 came back with the same map that we had
22 from 2011 and use the same company that
23 drew that map again, so we have some
24 concerns about how that map was fitting
25 with the inclusion of Bolivar Peninsula

1 Proceedings

2 again.

3 The second map that we have, that
4 is taking out some our districts, it's
5 cutting 336 in three parts, so if we're
6 going to cut our precincts in three
7 different parts, that doesn't give fair
8 representation for the people that live
9 there and we don't want our districts
10 chopped up because that's an unfair
11 advantage, and we won't have the correct
12 voting power that we had before, and so
13 we need to have these maps relooked at.

14 We also are concerned that when
15 this process was done, we don't feel
16 like the process was inclusive, that you
17 could have had some meetings set up to
18 say we got to be holding, redistricting
19 and we can come in and make input on it.
20 But that wasn't done, so the citizens of
21 my area are concerned that they wasn't
22 even involved in the process, that we
23 got maps and nobody asked about input
24 about the maps.

25 And so I don't know how you all

1 Proceedings

2 think that's fair because you could've
3 hold different meetings so everybody in
4 the county can come out and have input
5 on what the maps were. And so we can
6 see the new data from the census that
7 you were using to draw the maps or
8 whatever the legal team was using to
9 draw the map. We need numbers and stuff
10 to see that these maps are fair, and we
11 didn't have any of that.

12 So what we're suggesting is that
13 you guys start over, show us the
14 numbers, show us the lines that you
15 have, and let the people of Galveston
16 County decide whether some of these maps
17 are fair because we don't think they
18 are. We just think they're something to
19 dilute the voting power of the people in
20 our community.

21 COUNTY JUDGE HENRY: Thank you.

22 UNKNOWN SPEAKER: Dr. Annette
23 Jenkins.

24 DR. JENKINS: Good afternoon. I
25 thought that's very important for us to

1 Proceedings

2 It's like playing football, 100 yards to
3 the goal post there. What
4 gerrymandering is is that when your
5 favorite team decides to play, you move
6 the goal post and take ten more yards
7 off of it. That's what you're trying to
8 do.

9 Commissioner Holmes has been a
10 help, not only to this precinct, but all
11 over. During storms, during -- anything
12 freezes, he's fed folks. Everybody has
13 come. He has a strong representation,
14 not only in this district. But you know
15 what? You're not going to treat me the
16 way he treats me. You're not going to
17 look out for me the way he looks out for
18 me. And so I want you to know this from
19 a minister's point, one day we're all
20 going to have to lay down and die.
21 We're going to have to answer to God for
22 what we do.

23 UNKNOWN SPEAKER: Mr. Henry Gomez?

24 MR. GOMEZ: Excuse me.

25 Commissioners, my name is Henry Gomez.

1 Proceedings

2 I live in Texas City, Texas.

3 I don't agree with the Map 1 or
4 Map 2. The thing is that you're
5 separating not only African Americans,
6 you're separating the Hispanic
7 community. We have worked with Mr.
8 Apffel also, and Mr. Holmes also too.
9 But the thing is, this is (inaudible).
10 I don't want to echo everything that
11 everybody says, but I believe it's
12 gerrymandering.

13 I believe we need to go back to
14 the drawing room and draw new lines and
15 have the meetings open to the public.
16 And the most important thing is: Have
17 them open to the public and let these
18 people see the numbers and see how we're
19 going to work out new maps to satisfy
20 not only the African Americans, but the
21 Hispanics also too. I thank you for
22 your time.

23 UNKNOWN SPEAKER: Wendy Langham.

24 COUNTY JUDGE HENRY: If I could
25 address one recurring theme. We don't

1 Proceedings
2 have time. We must adopt a map by
3 tomorrow according to Secretary of
4 State. That's not our requirement.
5 That's the State of Texas requirements.

6 UNKNOWN SPEAKER: Wendy? Wendy?
7 She's right here.

8 Hey, please be respectful of the
9 person who has time.

10 MS. LANGHAM: Good afternoon. My
11 name is Wendy Langham.

12 After hearing you say that, why do
13 you even have us here? You had no
14 intention of changing the map -- of even
15 getting our input. I hadn't thought
16 that this is what I was going to say to
17 you, but it seems so dishonest. It's
18 like you're placating us. We don't
19 matter to you.

20 Juneteenth is something that's
21 come up in the paper here recently. It
22 involves Galveston and Galveston County.
23 That involves us, us as Black people.
24 You're telling me that I don't matter.
25 I don't like that. My parents raised me

1 Proceedings
2 to believe in myself and to treat people
3 like I want to be that I would want to
4 be treated. You're not doing that.
5 Now, the three of you sitting up there
6 can you say you know anything about my
7 life and the way I live? You can't.

8 This man does. He's lived it. He
9 lives with us. He helps us. Y'all are
10 doing this. Y'all are picking who you
11 want to vote for you, so that you get in
12 the office. I want to pick who I want
13 to vote for. And I'm telling you right
14 now, it's not you. But you're telling
15 me now that this meeting doesn't matter.
16 We're here talking for no reason.
17 You're going to turn in your maps, and
18 we don't like it.

19 UNKNOWN SPEAKER: Nakisha Paul?

20 MS. PAUL: Good afternoon. My
21 name is Nakisha Paul, and I reside in
22 the community of interest where
23 preserving our precinct brings about all
24 of our awareness. I want to first
25 acknowledge that if all of you as public

1 Proceedings
2 by Map 2. Also, I would like to thank
3 Commissioner Apffel for his support of
4 Bolivar Peninsula of the last few years.
5 We may be small, but, you know, we're
6 getting big enough that we do have a lot
7 of problems. Thank y'all very much.

8 COUNTY JUDGE HENRY: Okay. That's
9 all we have for --

10 UNKNOWN SPEAKER: Did you sign up
11 as well?

12 Okay. That's all we have for
13 public comment.

14 COUNTY JUDGE HENRY: Before we get
15 to the next part, I would like to let
16 everyone know we did online questions
17 and people responded. 430 440 total
18 responses as of about 12:30 this
19 afternoon. These are open to reporters,
20 open records request, of course. If you
21 want to call, just make sure that, you
22 know, this is as of 12:30, if any had
23 come in since then I wouldn't know about
24 them.

25 Of the 440 that came in, 168 did

1 Proceedings
2 not discuss a particular map, they just
3 called me names, mostly. Of the people
4 who did choose a map preference, Map 1
5 was -- received 64 responses. Map 2
6 received 208 responses. So of those
7 responding to a particular map, 76.4,
8 Map 2. 23.5, Map 1.

9 With that, I'm going to make the
10 motion to approve Map 2.

11 COMMISSIONER APFFEL: I second the
12 motion.

13 COUNTY JUDGE HENRY: I have a
14 second.

15 There's discussion.

16 Commissioner Holmes, I believe you
17 have something to --

18 COMMISSIONER HOLMES: Yeah, I have
19 something to say.

20 First of all, let me say -- first
21 of all, thank you, everybody for coming.
22 I didn't personally call anybody or ask
23 anybody to come down here, but certainly
24 for your comments -- I'm certainly
25 overwhelmed at the number of people that

EXHIBIT 15

*Excerpts of January 5, 2023 Deposition
of Commissioner Darrell Apffel*

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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.

A P P E A R A N C E S

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20
21 ALSO PRESENT:
Ray Burchette, Videographer

22
23
24
25

1 follow-up questions about your general statement
2 that you had ties to the community, other than
3 those.

4 So, were you affiliated with any local
5 organizations?

6 A. Affiliated as in a member of the NAACP? Or
7 what do you mean by that, affiliated? I don't know
8 what that means.

9 Q. More generally, were you affiliated --
10 or were you a member of any other local
11 organizations?

12 A. No.

13 Q. Any --

14 A. I'm not a very social person.

15 Q. No social clubs, no political organizations?

16 A. Not that I'm -- not that I recall, no.

17 Q. What church did you attend?

18 A. I was born and raised a Catholic, and went
19 to St. Patrick's Elementary School. And graduated
20 from the Catholic high school.

21 So I went to Catholic churches, until I
22 married my wife in June of 1986. And we then
23 started attending non-denominational church.

24 And I've been to several. But most
25 recently, we are members of The Fellowship in

1 Texas City.

2 Q. In your role as Justice of the Peace, did
3 you interact with the commissioners in their
4 official capacity?

5 MR. RUSSO: Did you what? Sorry?

6 THE WITNESS: Interact.

7 Q. (BY MS. VALL-LLOBERA) Did you interact?

8 MR. RUSSO: Interact, sorry.

9 A. I mean, I'm going to say no.

10 Q. (BY MS. VALL-LLOBERA) Do you recall who the
11 commissioners were around that time frame?

12 A. Eddie Janek, Eddie Barr, Stephen Holmes, and
13 Judge Jim Yarbrough.

14 And then I was -- oh, and I -- that's only
15 four. So, I'm missing one. Anyway, there's one
16 missing.

17 Q. What about Ken Clark?

18 A. Ah, Mr. Clark, yes.

19 Q. So, thinking about, let's say, 2009 or 2010,
20 were there Democrats on the Commissioners Court?

21 A. 2009, yes. 2010, no.

22 Q. What changed between 2009 and 2010?

23 A. The population. That was the big swing in
24 the Galveston County.

25 Q. I see. So, in 2008 or 2009, then, how many

1 Democrats were on the Commissioners Court?

2 A. The judge and three commissioners.

3 Q. Okay. And in 2011, how many Democrats were
4 there?

5 A. It was just the opposite. It was one
6 Democrat, and three commissioners, Republican.

7 Q. In 2008, when you identified as a Democrat,
8 did you work closely with the Democratic -- the
9 Democrat commissioners?

10 A. You know, I may have misspoke, because it --
11 because those terms are -- are staggered. So
12 they're -- while the Republican judge took office
13 in 2010, there might have still been two Democratic
14 commissioners until their term in '12.

15 Q. Maybe we can rephrase a little more
16 generally.

17 Was there a shift in the Commissioners Court
18 from more Democratic to more Republican, between
19 2005 and 2012?

20 A. Yes.

21 Q. Okay. Between that time period, did you
22 work closely with any of the commissioners that --
23 or the judge that identified a Democrat?

24 A. Patrick Doyle was my law partner.

25 Q. Did you share policy positions with him?

1 A. I would say most.

2 Q. I want to talk about a couple of specific
3 votes.

4 The Commissioners Court decided in 2020 not
5 to remove the Confederate monument in front of
6 Galveston County courthouse.

7 Do you recall that?

8 A. I do.

9 Q. And this was despite attempts by Black
10 residents and Commissioner Holmes to have it
11 removed, correct?

12 A. Yes.

13 Q. During the special session about this,
14 various people spoke out against the statue.

15 Do you recall that?

16 A. I do.

17 Q. In fact, 16 people spoke out against the
18 statue.

19 Does that sound right?

20 A. I -- if you -- if you say so. I don't
21 remember. But, okay.

22 Q. Did you support removal?

23 A. No. I voted against removal.

24 Q. Why didn't you support the removal?

25 A. Be -- because they've been there as long as

1 they've been there. The history -- they certainly
2 didn't affect my children. And I believe that
3 history is an important part for our children to
4 understand and learn.

5 Q. What did you -- what did you understand was
6 the reason Commissioner Holmes and others wanted to
7 remove the statue?

8 MR. RUSSO: Object as vague.

9 A. Yeah, I don't know. I never understood it.

10 Q. (BY MS. VALL-LLOBERA) Earlier, you said
11 that you -- it certainly didn't affect your
12 children, regarding the Confederate statue.

13 What did you mean by that?

14 A. Meaning that history is important for -- for
15 our children to understand and know.

16 Q. Did you think the statue affected other
17 people's children?

18 A. No.

19 Q. What did you understand was the argument
20 against the statue?

21 A. I don't -- I don't really know it.

22 Q. Did you listen to the people who supported
23 removing the statue?

24 A. Absolutely.

25 Q. Did you understand their concerns?

1 A. Obviously, at that time, I did, yes, of
2 course. But I don't recall what they were.

3 Q. I think earlier you said you didn't
4 understand what the argument was, for removing
5 the --

6 A. And I don't now. You're saying -- you're
7 asking me did I listen to them, and I'm saying
8 sure. And I absorbed what they said, and I voted
9 accordingly.

10 Q. In July 2021, you wanted to vote to approve
11 Judge Henry's disaster declaration and approve the
12 emergency spending for, quote, border security
13 issues, quote.

14 Do you recall that?

15 A. I did. I do.

16 Q. But you weren't able to -- to approve that
17 declaration because of Zoom issues.

18 Is that correct? Does that ring any bells?

19 A. I -- that -- I remember right as a vote was
20 happening, I was on Zoom -- I was in a Zoom meeting
21 and I got disconnected. But I don't recall -- and
22 it was about a vote, but -- and maybe it was that
23 one. So, yes, maybe so.

24 Q. Why did you think this was a good use of
25 county resources?

1 everything.

2 I think that we all expect, as fellow
3 commissioners, to filter out, and -- and if we --
4 but certainly, everyone has the right to present
5 anything they want.

6 Q. (BY MS. VALL-LLOBERA) The 2020 census data
7 came out in August 2021, correct?

8 A. Did you give me a month there? I'm sorry.

9 Q. August 2021.

10 A. I don't recall that. But I know that we
11 were waiting -- we had approved the contract, and
12 we were waiting for census data.

13 Q. What actions did you take with regards to
14 redistricting, between the approval of that
15 contract with Mr. Oldham, and when the census data
16 came out?

17 A. Nothing.

18 Q. What awareness did you have of Mr. Oldham
19 working on redistricting?

20 A. None.

21 Q. Did you have any conversations with
22 Mr. Oldham regarding that -- excuse me.

23 Did you have any conversations with
24 Mr. Oldham after the contract was signed, before
25 the census data came out?

1 A. No, not that I recall.

2 Q. Did you have -- did you have any
3 conversations with the other commissioners about
4 redistricting during this time?

5 A. No.

6 Q. Why didn't you do any work before the census
7 data came out?

8 MR. RUSSO: Objection speculation.

9 A. I was a -- somewhat of a freshman on the
10 Court, and I had not experienced any of the
11 redistricting. And so, I did not know what to
12 expect or how -- how to proceed.

13 Wait. That was -- that was...

14 Q. (BY MS. VALL-LLOBERA) Did you -- did you
15 seek out any information regarding the
16 redistricting process?

17 A. No.

18 Q. What steps did you take to -- to fill in
19 this knowledge gap of yours, regarding the
20 redistricting process?

21 A. I asked Judge Henry -- typically, in the
22 past, I believe that Ken Clark was the one
23 commissioner that assisted with the redistricting.

24 And so I asked Judge Henry, hey, when
25 redistricting kicks off, if it kicks off, would you

1 include me?

2 Because I wanted to be included.

3 Q. What did Judge Henry say?

4 A. Absolutely. We need to schedule a meeting
5 with Dale Oldham. And when that happens, I'll let
6 you know.

7 Q. Did that meeting take place?

8 A. It did.

9 Q. When did that meeting take place?

10 A. I don't remember -- I'm -- I'm guessing at
11 or about -- after the census data came out, a phone
12 conference was set up between me and Dale Oldham,
13 and our other attorney, Paul Ready, and Mark Henry
14 and Tyler Drummond.

15 And I participated in that call.

16 Q. So did this meeting occur at your request?

17 A. No.

18 Q. So they were including you in a meeting,
19 at --

20 A. At my request.

21 Q. All right.

22 A. The way I understood it was, okay -- at some
23 point, I had said, I would like to be in
24 redistricting with you, Judge Henry, if -- as
25 things move along.

1 A. Yes.

2 Q. Do you recall receiving the e-mail from
3 Ms. Liechty about scheduling this meeting with Dale
4 Oldham?

5 A. No, but it -- I don't doubt that this is
6 what caused us to have that meeting I referenced.

7 Q. Am I pronouncing her name correctly? Is
8 that Liechty?

9 A. Liechty.

10 Q. Liechty, thank you.

11 Do you recall reading the forwarded e-mail
12 below, from Paul Ready?

13 A. Yes.

14 Q. Have you received any communication from
15 Ready about redistricting in any other format
16 previously?

17 A. No. This was our kickoff.

18 Q. Returning to the second page of this
19 exhibit, I want to read a line from Mr. Ready's
20 initial e-mail: Our first step needs to be an
21 online meeting or conference call with you, me,
22 Judge Henry and Commissioner Apffel.

23 Do you see that?

24 A. Yes.

25 Q. And the you refers to Mr. Oldham, correct?

1 A. I guess.

2 Q. Who -- who is the recipient of this e-mail?

3 A. Yeah, Dale Oldham.

4 Q. Why was this -- why was meeting with you the
5 first step?

6 A. Because they had received the census data,
7 and it would -- we had approved the contract with
8 the -- him and his firms, much earlier. And it was
9 time to begin discussing redistricting.

10 Q. But only with Judge Henry and you, from the
11 Commissioners Court?

12 A. Yeah. Because as I told you, it's the
13 judge's duty and responsibility to handle
14 redistricting, in my opinion.

15 And more than two people would be a quorum.
16 And so, on many occasions, the judge will invite a
17 commissioner to a meeting for informational
18 purposes.

19 And -- and -- and he had done that, I knew,
20 with Ken Clark, in redistricting before. And I
21 asked that I be that one.

22 Q. Did you know that Mr. Ready and Mr. Oldham
23 were setting up similar online meetings or
24 conference calls with the other commissioners, to
25 discuss redistricting?

1 our position, but I don't -- you know, it's
2 deposition procedure. I just need to make sure I
3 maintain my -- and preserve the objections for the
4 record.

5 Q. (BY MS. VALL-LLOBERA) Did -- without
6 revealing the substance of any conversations with
7 counsel, as we sit here today, what is your
8 understanding of traditional redistricting
9 criteria?

10 A. The county grows by people. The precincts
11 become imbalanced by people. And we are required
12 to continually balance the representation of the
13 people.

14 Q. Specifically, how do you have to rebalance
15 the populations?

16 A. In my simple little way --

17 MR. RUSSO: Let me object -- just
18 let me interpose -- interpose the objection on
19 attorney-client privilege grounds. And you've
20 heard the basis before.

21 So don't reveal conversations or
22 information you've learned from Dale, related to
23 the redistricting effort.

24 A. Well, my simple understanding is to -- to
25 redraw the lines to balance the population, to be

1 within compliance with the law.

2 Q. (BY MS. VALL-LLOBERA) Is the only criteria
3 for redistricting that the numbers line up?

4 A. I don't know.

5 Q. You've stated that the imbalances needed to
6 be corrected, based on population shifts.

7 What -- do you need to consider anything
8 other than population numbers, in redrawing maps?

9 A. I don't --

10 MR. RUSSO: Same objection on
11 attorney-client privilege grounds.

12 To the extent you can answer without
13 revealing conversations between the county, you,
14 and any of your counsel, you can answer.

15 MS. VALL-LLOBERA: And we
16 preserve --

17 A. I trust that the people we hired to do the
18 job, do it in compliance with the law.

19 Q. (BY MS. VALL-LLOBERA) Are there any other
20 factors considered in drawing the maps?

21 A. I don't know.

22 Q. Earlier, you stated that you were looking
23 to -- to cut Bolivar.

24 Was that a factor that you were considering
25 in redrawing the maps?

1 any other meetings about redistricting?

2 A. To my knowledge, no.

3 Q. So they didn't meet with Mr. Oldham, to your
4 knowledge?

5 A. Oh, I thought you meant other than, to my
6 knowledge. To my knowledge --

7 Q. I can rephrase --

8 A. Okay.

9 Q. -- so it's clearer.

10 To your -- to your knowledge, did any of the
11 other commissioners or Judge Henry, or their
12 staffs, have other meetings or conversations about
13 redistricting with Mr. Oldham, or his staff?

14 A. After -- at or about the time we had -- that
15 I had mine?

16 Q. Correct.

17 A. My understanding -- I didn't witness it.
18 But my understanding was, he was there to -- for
19 two days, to meet with me, Mr. Clark,
20 Commissioner Holmes, Commissioner Giusti, and
21 Judge Henry.

22 Q. Okay. And to your knowledge, did the
23 commissioners or did Judge Henry's other staff have
24 other meetings or conversations about
25 redistricting, other than those meetings with

1 A. Other than those I've just described, and
2 what I believe -- I don't know what a public -- if
3 there's a definition of public hearing, that I
4 don't know of. But...

5 Q. So you reviewed --

6 A. Social media, in 2021 -- excuse me, in --
7 was -- is far more public than it was in 2011. So,
8 I felt like it was sufficient, as public notice and
9 comment period.

10 Q. So -- excuse me.

11 Did anyone report to you how many comments
12 were coming in favor of Map 1 or in favor of Map 2,
13 or against both of the maps?

14 A. I don't remember. But I seem to recollect
15 that they -- the majority were for Map 2.

16 Q. And you said you reviewed some comments that
17 came in through the portal, correct?

18 A. Yeah. But -- but I can't tell what they
19 were, or what -- I mean, it was not like for a
20 specific reason. I was just looking at --

21 Q. But --

22 A. -- to see what some of the comments were
23 like.

24 Q. So you would just grab a -- a random stack
25 to get a sense of what was going on?

1 A. That's it.

2 Q. What was the purpose of this public comments
3 portal, if not for the commissioners to personally
4 review the public comments?

5 A. I believe that's what it was for, was for --

6 Q. But you didn't review them?

7 A. I -- I -- other than what I have described
8 it, yes, I did.

9 Q. Did Judge Henry, or other members of his
10 staff, expect -- express -- express a preference
11 for either map before the special session?

12 A. Yes.

13 Q. Which map did they prefer?

14 A. Judge Henry. And I mean, he -- when he
15 posted them -- he posted them, and then I think he
16 went on his Facebook page and per -- what's the
17 word; not promoted it, what's the word -- stated it
18 was the map of his choice.

19 He -- he went -- the paper -- the paper
20 published an article. And it stated, in -- in the
21 Galveston Daily News article, that he was -- he was
22 going to support Map 2.

23 Q. Did he tell you why he -- excuse me.

24 Did he state why he supported Map 2?

25 A. At the meeting, at the adoption, after all

1 precinct seat?

2 A. Safety?

3 Q. Were you concerned, at all, about your
4 precinct becoming less Republican?

5 A. No, I did not worry about that.

6 Q. Was that a fact -- was the partisanship a
7 factor in your evaluation of these maps?

8 A. Not at all.

9 Q. Did you visit Bolivar to promote the
10 proposed maps, or to discuss the proposed maps?

11 A. I did not. No. I'm just trying to think
12 back to the chamber. The chamber -- I believe the
13 Bolivar chamber posted them on their website. But
14 there was no opinions of mine, or anyone else's, as
15 to which -- which map.

16 MS. VALL-LLOBERA: Let's introduce
17 Tab 24, to refresh Mr. Apffel's -- excuse me,
18 Mr. Apffel's memory.

19 MR. RUSSO: Objection to sidebar.
20 I'm kidding. I saw your fingers off
21 the thing.

22 MS. VALL-LLOBERA: This is going to
23 be Apffel Exhibit 19.

24 (Exhibit 19 is marked.)

25 Q. (BY MS. VALL-LLOBERA) So,

1 And it's dated November 10th.

2 A. Correct.

3 Q. Have you seen this before?

4 A. Yes. And that's how I knew I had seen the
5 League of Women Voters letter because I thought it
6 was interesting that she was taking the exact same
7 letter, updating it, and changing the signature.

8 And so, it appeared to be -- then it really
9 made me think, okay, this is a setup.

10 Q. What do you mean by a setup?

11 A. As if the -- these -- someone didn't like
12 the way that we were doing it and was going to put
13 self-serving documents out there to later come back
14 and use.

15 Q. What do you mean by, self-serving documents?

16 A. Well, back to what I told you. Your opinion
17 is that all of these things needed to be done. My
18 opinion is that we hired the people to do the -- do
19 it within -- within the bounds of law, and -- and
20 in the spirit of the law. And so, we did that.

21 And so, this is one opinion of how it should
22 be done, versus the way that we did it.

23 Q. Would you --

24 A. But I don't know Leslie Clift.

25 Q. What do you think the spirit of the law is?

1 A. For the tenth time, respectfully, equalizing
2 the population within a 10 percent margin
3 differential, and -- and redrawing the lines
4 accordingly.

5 Q. And you said you didn't know who Leslie
6 Clift is, correct?

7 A. I may. But at this moment, I can't place
8 her. And I didn't recall her then, either.

9 MS. VALL-LLOBERA: I would like to
10 introduce the next exhibit, which is Tab 28. This
11 is Apffel Exhibit 23.

12 (Exhibit 23 is marked.)

13 MS. VALL-LLOBERA: Here.

14 MR. RUSSO: Thank you.

15 Q. (BY MS. VALL-LLOBERA) This is your response
16 to Leslie Clift, copying --

17 A. Yes.

18 Q. -- the judge and commissioners.

19 You write to her, quote, Thank you. I think
20 you're a bit confused. I would be happy to discuss
21 with you on phone.

22 Did I read that correctly?

23 A. Correct. I respond to everybody. I do not
24 let any e-mail go unresponded. Except, I think did
25 on this one.

1 Q. Now, you mentioned earlier that you recall
2 that Commissioner Holmes had brought some maps
3 during the November 12, 2021, special hearing.

4 Is that correct?

5 A. Correct.

6 Q. Did you, by chance, get a chance to look at
7 those maps?

8 A. Yeah. I had forgotten about them until she
9 reminded me. And so, yes. But I -- I still have a
10 vague recollection, but I -- if he presented them,
11 I looked at them and made a decision based on all
12 of the maps that were presented.

13 Q. So, in looking at those maps, did you -- can
14 you recall if Commissioner Holmes --
15 Commissioner Holmes' district was preserved, in
16 terms of demographics?

17 A. No.

18 Q. Do you have any reason to believe that
19 Commissioner Holmes would present maps that would
20 not preserve his district?

21 A. I -- I don't remember if they were
22 gerrymandered like before or not.

23 Q. How do you define gerrymandered?

24 A. Lines drawn for -- up -- crazy, to circle a
25 certain population.

1 Q. Are you -- are you saying that the maps then
2 had, I guess, what you call crazy lines drawn?

3 A. Which maps?

4 Q. Commissioner Holmes'.

5 A. I -- that's -- no. I said unless. I
6 don't -- I don't remember. You asked me did I
7 know -- yeah.

8 Q. Okay. So you -- you can (unintelligible)?

9 THE REPORTER: I couldn't hear that.

10 Q. (BY MS. REYES) You cannot recall.

11 Is that correct?

12 A. His maps, no.

13 Q. What -- when you mentioned gerrymandered
14 like before, what do you -- what are you referring
15 to?

16 A. Like -- like I just said, drawing lines and
17 making districts that just encompass and circle a
18 certain type of people.

19 Q. What do you mean, certain type of people?

20 A. Well, you're the one referring to, for
21 example, people of color, or minorities.

22 Q. Oh, so that's -- that's what you meant?

23 A. Yeah.

24 Q. So when you said gerrymandered like before,
25 were you not -- were you referring to any prior

1 maps?

2 A. Yeah. I think the map that Stephen Holmes
3 was under, the previous map, was a gerrymandered
4 map.

5 Q. And what makes you think that?

6 A. Have you seen it? The people he represented
7 lived down south and he lived up north. And it was
8 this long skinny, to go up and catch his house --
9 he didn't even live among the people. I don't have
10 a current -- the current photo of the old map.

11 Q. Okay. Now, I am going to move on.

12 Do you know -- I'm sorry. Going back to
13 that, do you know why his -- his district was drawn
14 that way?

15 A. I do not.

16 Q. Now, I am going to go to an exhibit. I may
17 have accidentally lost.

18 (Voices en sotto.)

19 Q. (BY MS. REYES) I think it should be showing
20 up as Exhibit 31.

21 (Exhibit 31 is marked.)

22 Q. (BY MS. REYES) So are you familiar with
23 this document?

24 A. No.

25 Q. Earlier in the -- in the -- in the

1 Q. (Unintelligible).

2 THE REPORTER: I didn't get that.

3 Q. (BY MR. NEWKIRK) Do you believe Hurricane
4 Ike affected minority communities more so than
5 other communities?

6 A. No.

7 Q. Okay. Based on your long-time residence in
8 the county, and based on your experience as a
9 commissioner, are there any economic differences
10 between Bolivar Peninsula and the rest of the
11 county?

12 A. I would say there's no -- or very little
13 socioeconomic folks that live there.

14 Q. Apologies. I -- I didn't quite catch that.
15 You said there was very little --

16 A. There's -- I would say there's very few, you
17 know, poverty -- poverty or low income people that
18 live there.

19 Q. What are some economic differences between
20 Bolivar Peninsula and the rest of the county,
21 besides the affluent -- relative affluency you just
22 identified?

23 MR. RUSSO: This is nuts.

24 THE REPORTER: Can I read that back
25 to you, please?

EXHIBIT 16

*Excerpts of January 6, 2023 Deposition
of Commissioner Joseph Giusti*

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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.

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1 important that the record is clear, and I think that's
2 everybody's goal here. So if the record becomes
3 unclear, I think it's everybody here are all of our
4 goals to make sure that it's not vague, not
5 speculative, and not unclear. So let's get -- let's
6 get going.

7 Q. (By Mr. Gear) So let me just start over. Do
8 you believe that the core of your voter support in
9 Precinct 2 was Caucasian voters?

10 A. Yes.

11 Q. So when you campaigned for county commissioner
12 in 2014, how did you go about campaigning?

13 A. Attending community events, literature that
14 was sent out, you know, mailers, things like that.

15 Q. And what events -- if you can recall, what
16 events did you attend?

17 A. Gosh, I don't recall.

18 Q. So let's move forward to the 2022 election
19 campaign. What events did you attend then?

20 A. Very few. I was unopposed.

21 Q. So also in 2022 would you have considered the
22 core of your voter support in Precinct 2 Caucasian
23 voters?

24 A. Yes.

25 Q. And when you said very few events, did you say

1 board member for Chamber of Commerce in Hitchcock?

2 A. 2015 to '19 maybe.

3 Q. And I think you also said Galveston.

4 A. I'm not on the board of Galveston. Just a
5 member.

6 Q. Okay. And when did you join as a member for
7 the Galveston Chamber of Commerce?

8 A. Probably five years ago.

9 Q. And you're currently a member now?

10 A. Yes.

11 Q. You indicated materials that you distributed
12 during your election campaign.

13 A. Yes.

14 Q. Were those materials in any other language
15 other than English?

16 A. No.

17 Q. Did you have an election campaign staff to
18 assist you during your campaign in 2022?

19 A. Yes.

20 Q. And can you identify by name the staff that
21 you had assisting you?

22 A. Jeff Yates, Sarah Lauer, L-a-u-e-r I believe,
23 Barry Kaplan.

24 Q. Anyone else?

25 A. Tyler Drummond.

1 A. I don't recall, sir.

2 Q. Based on your understanding, was there a
3 decision made to establish redistricting criteria?

4 A. I don't recall that either.

5 Q. So, again, was there redistricting criteria
6 that was established, adopted, during the 2021
7 redistricting process?

8 MS. OLALDE: Objection; asked and
9 answered.

10 THE WITNESS: I don't recall.

11 Q. (By Mr. Gear) Is there any redistricting
12 criteria that you would have considered important
13 during the 2021 redistricting process?

14 A. Yes, sir. I think the important things would
15 have been leveling out the populations, also trying to
16 draw lines that the public understood as far as knowing
17 who their commissioners are. The old lines were kind
18 of confusing at times as to where precincts started and
19 where they ended.

20 Q. Anything else?

21 A. That's the majority. That's it.

22 Q. And so you mentioned Mr. Oldham, the
23 redistricting consultant. Did the county's post-2020
24 census redistricting processes begin at the April 5th,
25 2021, commissioners court?

1 A. Those came in, yes, sir.

2 Q. Okay. So -- and you turned those 40 comments
3 over to your attorney during the course of this
4 litigation?

5 A. Yes, sir. They were there, and he was aware
6 that they were there.

7 Q. Okay. The comments that came into the
8 county's portal --

9 A. Yes.

10 Q. -- can you tell me approximately how many of
11 the -- how many comments were received to that portal?

12 A. I really don't know. I wish I could tell you.
13 I can't.

14 Q. Okay. But I believe you said you had access
15 to that portal.

16 A. Yes.

17 Q. And did you access that portal during the
18 redistricting process to review those comments?

19 A. I did at one point and looked at a few. They
20 were not necessarily in support of one map or the
21 other, but there were a lot of supportive on changing.
22 And I guess, you know, in retrospect several were for
23 Map 2, I guess it was. There were some for Map 1, some
24 for Map 2, several against, of course. So it was a
25 pretty good mix, I think, if I remember right. And I

1 checked -- I looked at it early on before there were
2 many comments there.

3 Q. Do you have an idea of how many comments
4 ultimately were received by that portal?

5 A. I do not know.

6 Q. When you said you reviewed a few, do you have
7 a general idea how many of the comments you actually
8 reviewed?

9 A. Probably 15.

10 Q. So of those 15 comments, can you tell me how
11 many expressed support for Map 1?

12 A. Out of 15, just in my head, no, because I
13 would be guessing.

14 Q. Okay. Out of those 15 comments, can you
15 testify how many opposed Map 2?

16 A. I want to say they were pretty evenly split
17 as, you know, in favor of and against as a total.

18 Q. So at some point you -- you said there were
19 many comments, so at some point you stopped looking at
20 the portal?

21 A. Yes, sir.

22 Q. And why did you stop looking at the portal?

23 A. They were repetitive of what was being said.
24 Like I said, it seemed to be going pretty evenly split.

25 Q. So I believe -- and correct me if I'm wrong,

1 please. I believe you indicated that the emails that
2 you received, the 40 comments, there were no changes
3 made to Maps 1 or 2 as a result of those comments. Do
4 you recall that testimony?

5 A. Yes, sir.

6 Q. So for the comments that went into the county
7 portal, based on your knowledge, were there any changes
8 made to Map 1 or Map 2 as a result of reviewing those
9 comments? And I'm talking about the commissioner court
10 reviewing those comments.

11 A. No, sir.

12 Q. We also talked prior to the break about a
13 coastal precinct. Do you know, based on your personal
14 knowledge, where the idea of the creation of a coastal
15 precinct came from?

16 A. I am not positive of that, where it came from.

17 Q. Of the four maps that you reviewed, do you
18 recall which of those you thought were the best maps
19 for the commissioners court plan?

20 A. The only thing I remember is the two that we
21 ultimately decided between. I don't remember what the
22 other two really were, didn't look at them long enough
23 or hard enough, I guess.

24 Q. And did you favor either Map 1 or Map 2 over
25 the other?

1 Q. Did you ever hear any concerns expressed by
2 your constituents that the residents of Galveston
3 Island were not being adequately represented by their
4 commissioner?

5 A. No, sir.

6 Q. And so prior to the break you talked about the
7 goals for redistricting as you saw them, and I believe
8 you indicated that keeping your parents in your
9 district, keeping yourself in your district in part was
10 part of those goals. Do you recall that testimony?

11 A. Yes, sir.

12 Q. And I just want to be clear for the record,
13 and forgive me if I left anything out. I'm not
14 intending to do that. Can you completely state what
15 your goals were during the 2021 redistricting process?

16 MS. OLALDE: Objection; asked and
17 answered.

18 Go ahead.

19 THE WITNESS: Basically as I stated, to
20 level the populations amongst the precincts, to have
21 lines that were easier -- precinct lines, commissioner
22 precinct lines that were easier for the public to know
23 which precincts they were in. One goal was for me to
24 still live in my precinct, and another was I wanted to
25 keep my mom and dad in my precinct.

1 Q. (By Mr. Gear) Did you speak with any other
2 commissioners during the 2021 redistricting process
3 regarding continuing to live in their precinct under
4 the adopted plan?

5 A. No, sir.

6 Q. Do you have any personal knowledge if other
7 commissioners shared the same concern about being able
8 to continue to live in their precinct under the adopted
9 plan?

10 A. No, sir.

11 Q. Have you ever talked to Commissioner Holmes
12 about the needs of his constituents in Precinct 3?

13 MS. OLALDE: Objection; form, overbroad,
14 just wondering about period of time.

15 Q. (By Mr. Gear) Let me -- let me narrow the
16 time down. During the 2021 redistricting process.

17 A. No, sir.

18 Q. And then let me expand that time. From any
19 time period that you were elected as a commissioner to
20 the adoption of the commissioners court plan in 2021,
21 did you ever discuss with Commissioner Holmes the --
22 any issues related to the needs of his constituents in
23 Precinct 3, Commissioners Court Precinct 3?

24 A. No, sir, not that I recall.

25 Q. Are you familiar with the socioeconomic

1 A. I wasn't going to run this time.

2 Q. How was your -- how would you say your
3 constituency has changed under the new map?

4 A. More rural, more unincorporated. I
5 wouldn't -- I shouldn't say more rural because Bolivar
6 is not really that rural anymore. It's really more of
7 what used to be a sleepy fishing village that is now a
8 pretty thriving beach community. So it's changed by
9 adding more workload to what I've got with the added
10 responsibility of more beaches, more roads, more -- I
11 went from about a hundred miles -- a little over a
12 hundred miles of unincorporated roadway to probably 200
13 miles of unincorporated roadway.

14 Q. Would you say the -- how would you describe
15 how the racial makeup has changed?

16 A. Honestly I don't think it's changed that much.
17 I think I've -- and I'm not sure exactly where. I
18 don't know if I could put my finger on it other than
19 portions of Galveston where I picked up some minority.

20 Q. So would you say it's more or less republican?

21 A. Probably less republican.

22 Q. And how do you communicate with constituents
23 about their needs? Do you host events?

24 A. On occasion we'll do some stuff, but not --
25 not very often, to be honest. We'll do -- we just

1 recently did a citizens appreciation where we hosted a
2 big party and sent it out to everybody on Facebook, on
3 different platforms, do up fliers around the county
4 saying, "Y'all come visit with us. Come ask questions.
5 Come sit down and visit with us."

6 Q. Is that how you typically promote your events?

7 A. Pretty much. It's the cheapest way.

8 Q. And what organizations do you generally work
9 with when you host these events?

10 A. Occasionally I'll work with Lighthouse Charity
11 Team as far as cooking skills and that sort of stuff,
12 but normally we just do them on our own.

13 Q. Do you generally address constituent concerns
14 at events or office hours?

15 A. Both.

16 Q. Earlier in your testimony you noted that
17 Commissioner Apffel was holding your hand as you
18 transitioned to representing Bolivar Peninsula; is that
19 correct?

20 A. Correct.

21 Q. Can you provide examples of how he's
22 supporting you?

23 A. Yes. The one article about -- that was in the
24 Crystal Beach bulletin, taking me over, hosting a
25 meeting with the Chamber of Commerce, introducing me to

1 the players, if you would, in Bolivar, who is who that
2 can ask you the questions that's very involved in that
3 community.

4 Q. Have you had any similar events with
5 Commissioner Holmes absorbing some of his constituents?

6 A. No. I don't think I've absorbed really that
7 many of his constituents, though, with the way my lines
8 hit.

9 Q. Have you reached out to Commissioner Holmes
10 about the transition of some of his constituents to
11 your precinct?

12 A. I have not.

13 Q. Why -- why haven't you reached out to him?

14 A. I was kind of waiting for him to give me a
15 call.

16 Q. Have you done any outreach specific to the new
17 areas within your precinct other than the one you
18 just --

19 A. Other than Bolivar, no, which is the -- really
20 the lion's share of it other than Galveston Island,
21 which Galveston I'm in every day. I didn't go through
22 the precinct every day. I know a lot of people in
23 Galveston being from there, being born and raised
24 there, and so I do -- I have reached out to the city
25 council and just let them know, "I'm here if you need

1 anything."

2 Q. Have you reached out to Galveston NAACP?

3 A. I have not.

4 Q. How about LULAC?

5 A. I have not.

6 Q. So --

7 A. I do have the LULAC president, though, on my
8 Facebook. And, in fact, she supported a Cinco de Mayo
9 festival that they do every year. I don't know if that
10 counts for nothing, but --

11 Q. Sounds fun.

12 A. It is.

13 Q. Earlier in your testimony you mentioned being
14 a member of two Masonic lodges?

15 A. Masonic, yes, sir.

16 Q. What kind of activities do those organizations
17 do?

18 A. The -- I haven't been real active in them, to
19 be honest. I need to get active again. You've heard
20 of the Shriners?

21 Q. I have not.

22 A. You haven't heard of the Shriners, the Shrine
23 Temple, the Shriners Burns Hospital down the road here?
24 Shriners are a part of that. You have to be a Mason
25 before you can be a Shriner, before you can join the

EXHIBIT 17

Excerpts of DEFS00036212

(Native version can be provided, upon request.)

GEOID20	cnt_202	acs_pp_	acs_cv_	ac_WNH	ac_BNH	ac_ONH	a_HISP	PL_Totl	PL_T_WN	PL_T_BN	PL_T_AS	PL_T_ON	PL_T_HI	PL_Tt18	PL_T18_W
481677227004000	48167	1,172	1,072	122	788	15	147	910	120	627	8	28	135	698	91
481677240002033	48167	1,925	1,767	809	651	7	300	1,854	1,215	590	8	8	41	1,854	1,215
481677227001010	48167	1,028	606	6	420	159	21	464	21	388	0	0	55	367	21
481677230002000	48167	502	446	58	359	17	12	591	96	362	1	9	124	479	86
481677226001000	48167	650	454	141	210	18	86	669	218	304	4	8	139	551	192
481677258003008	48167	553	374	59	198	17	100	517	87	311	14	19	100	363	72
481677212042000	48167	1,137	787	439	179	69	100	869	438	165	22	30	236	642	352
481677227001009	48167	458	270	38	178	47	7	155	33	113	0	3	6	138	29
481677237001004	48167	641	392	121	169	14	89	637	162	376	0	13	86	428	118
481677246001031	48167	422	225	53	165	0	7	491	66	360	0	3	62	279	34
481677227004010	48167	188	172	1	164	2	5	192	6	156	0	6	24	151	6
481677231003003	48167	401	378	125	155	8	90	30	4	11	3	9	6	22	4
481677219023009	48167	686	501	262	145	2	93	449	231	100	3	3	115	448	231
481677230001013	48167	191	164	6	140	0	18	165	27	106	0	5	27	128	24
481677212073001	48167	959	723	407	134	14	168	179	76	41	0	23	39	144	65
481677258003002	48167	626	423	184	131	23	86	1,331	559	394	32	68	310	1,046	476
481677237003006	48167	241	182	32	129	0	21	206	22	131	0	11	42	162	22
481677226001011	48167	303	212	54	128	1	29	268	62	136	0	3	67	224	58
481677237003004	48167	190	144	0	126	0	17	145	10	102	0	0	33	115	6
481677226001021	48167	203	142	10	121	1	10	177	5	151	0	0	21	135	5
481677258001005	48167	368	284	127	117	8	33	391	216	97	14	17	61	304	178
481677237001007	48167	236	144	15	115	0	15	219	5	195	0	0	19	106	3
481677212081001	48167	1,240	935	531	115	205	84	739	489	33	58	92	125	528	342
481677230003002	48167	304	206	62	113	0	31	195	64	95	0	4	32	163	55
481677220013026	48167	299	256	22	108	6	120	608	233	169	8	36	170	474	194
481677207022003	48167	662	420	166	108	81	65	348	147	76	9	23	102	278	121
481677231001003	48167	449	313	123	103	18	68	575	166	223	2	5	181	441	133
481677223005002	48167	272	196	28	101	50	18	21	0	5	0	0	16	11	0
481677220022002	48167	191	147	26	97	10	14	169	50	63	0	8	48	121	45
481677256002011	48167	253	203	74	92	9	28	394	187	100	15	26	81	362	175
481677227004004	48167	153	140	24	91	2	24	145	4	108	0	4	29	106	4
481677206012006	48167	304	224	94	90	38	2	138	61	46	14	19	12	109	49
481677206012000	48167	835	610	388	90	58	75	840	467	92	66	84	197	614	353
481677211022003	48167	689	394	248	88	20	38	462	269	65	0	17	111	356	223
481677215013004	48167	898	729	393	88	31	217	557	431	23	43	55	48	448	340
481677258001007	48167	183	141	38	88	1	15	132	35	47	0	5	45	108	28
481677219021025	48167	426	216	83	86	0	46	337	125	140	0	12	60	322	122
481677219021027	48167	422	214	64	86	0	64	268	52	138	0	3	75	196	47
481677212031000	48167	938	649	461	85	55	49	471	286	64	36	46	75	419	264
481677231002005	48167	469	344	170	83	5	87	144	65	45	2	4	30	124	57
481677226001019	48167	147	103	6	82	1	13	108	15	66	1	2	25	86	15
481677209001001	48167	144	90	5	82	0	2	323	22	183	0	12	106	158	13
481677227004013	48167	103	94	6	81	0	7	80	9	53	6	11	7	64	8
481677219023072	48167	143	105	10	80	2	13	167	31	96	0	9	31	99	25
481677229002016	48167	283	200	59	80	3	59	240	115	47	5	8	70	196	104
481677230003013	48167	164	111	20	79	0	11	107	18	62	0	2	25	80	10

GEOID20	PL_T18_B	PL_T18_A	PL_T18_O	PL_T18_H	HU_Tot	HU_Occ	HU_Vac	HHPop	GQ	GalvDist	Map 1	Map 2	VTDID20	% Cornyn	Est R
481677227004000	497	8	22	88	370	350	20	910	0	3	3	4	481670336	12%	85
481677240002033	590	8	8	41	0	0	0	0	1,854	3	3	2	481670311	21%	386
481677227001010	308	0	0	38	190	181	9	464	0	3	3	4	481670336	12%	45
481677230002000	292	1	9	92	272	243	29	591	0	3	3	4	481670331	21%	98
481677226001000	237	4	8	114	433	409	24	669	0	3	3	1	481670347	28%	153
481677258003008	211	14	19	61	268	248	20	517	0	2	2	2	481670223	47%	172
481677212042000	112	18	19	159	400	382	18	869	0	4	1	3	481670490	65%	420
481677227001009	100	0	3	6	91	67	24	155	0	3	3	4	481670336	12%	17
481677237001004	248	0	5	57	283	257	26	637	0	3	3	4	481670334	23%	99
481677246001031	204	0	3	38	194	184	10	491	0	3	3	2	481670311	21%	58
481677227004010	120	0	2	23	80	80	0	192	0	3	3	4	481670336	12%	18
481677231003003	11	0	4	3	6	6	0	30	0	3	3	4	481670338	38%	8
481677219023009	100	3	3	114	1	1	0	1	448	1	1	1	481670172	75%	334
481677230001013	87	0	0	17	99	86	13	165	0	3	3	4	481670331	21%	26
481677212073001	40	0	11	28	101	101	0	179	0	1	1	1	481670193	66%	95
481677258003002	286	24	54	230	753	660	93	1,331	0	2	2	2	481670223	47%	495
481677237003006	105	0	5	30	87	78	9	206	0	3	3	4	481670334	23%	37
481677226001011	111	0	2	53	119	112	7	268	0	3	3	1	481670336	12%	27
481677237003004	85	0	0	24	61	61	0	145	0	3	3	4	481670334	23%	27
481677226001021	120	0	0	10	83	70	13	177	0	3	3	1	481670336	12%	16
481677258001005	58	14	17	51	220	203	17	391	0	2	2	2	481670223	47%	144
481677237001007	91	0	0	12	87	81	6	219	0	3	3	4	481670334	23%	24
481677212081001	26	48	73	87	254	254	0	739	0	1	1	1	481670166	68%	357
481677230003002	74	0	2	32	88	88	0	195	0	3	3	4	481670331	21%	33
481677220013026	120	7	33	127	387	320	67	608	0	1	1	1	481670150	60%	287
481677207022003	66	9	14	77	196	183	13	348	0	4	4	3	481670454	61%	169
481677231001003	166	1	3	139	238	217	21	534	41	3	3	4	481670338	38%	170
481677223005002	0	0	0	11	2	2	0	21	0	3	3	1	481670343	43%	5
481677220022002	44	0	5	27	65	64	1	169	0	1	1	1	481670142	54%	65
481677256002011	94	14	22	71	300	287	13	394	0	2	2	2	481670224	50%	181
481677227004004	78	0	4	20	47	47	0	145	0	3	3	4	481670336	12%	13
481677206012006	38	10	14	8	43	43	0	138	0	2	2	4	481670220	62%	68
481677206012000	70	50	64	127	286	272	14	840	0	2	2	4	481670220	62%	381
481677211022003	51	0	10	72	209	209	0	462	0	1	1	1	481670197	68%	242
481677215013004	22	39	51	35	217	211	6	557	0	1	1	1	481670167	70%	315
481677258001007	42	0	5	33	62	62	0	132	0	2	2	2	481670223	47%	51
481677219021025	131	0	10	59	245	245	0	337	0	3	3	1	481670347	28%	89
481677219021027	94	0	0	55	148	148	0	268	0	3	3	1	481670347	28%	54
481677212031000	55	29	33	67	302	263	39	471	0	4	4	3	481670453	64%	267
481677231002005	42	2	4	21	92	90	2	144	0	3	3	4	481670338	38%	48
481677226001019	54	1	2	15	47	47	0	108	0	3	3	1	481670336	12%	10
481677209001001	91	0	0	54	104	104	0	323	0	3	3	3	481670340	14%	22
481677227004013	40	6	9	7	34	22	12	80	0	3	3	4	481670336	12%	8
481677219023072	61	0	3	10	60	56	4	167	0	3	3	4	481670338	38%	38
481677229002016	33	5	8	51	107	91	16	240	0	2	3	4	481670232	50%	98
481677230003013	50	0	2	18	49	49	0	107	0	3	3	4	481670331	21%	16

GEOID20	cnt_202	acs_pp_	acs_cv_	ac_WNH	ac_BNH	ac_ONH	a_HISP	PL_Totl	PL_T_WN	PL_T_BN	PL_T_AS	PL_T_ON	PL_T_HI	PL_Tt18	PL_T18_W
481677207021009	48167	693	493	279	79	20	115	721	455	50	19	40	176	555	364
481677219023071	48167	151	111	21	76	2	12	189	17	135	0	12	25	122	17
481677219012019	48167	497	363	233	74	12	44	375	130	131	8	29	85	296	108
481677226001002	48167	205	143	42	74	4	23	30	10	2	0	5	13	17	4
481677238001007	48167	264	207	66	73	0	68	212	58	125	0	1	28	155	51
481677219022017	48167	282	195	62	73	7	52	208	59	108	5	8	33	157	56
481677227004012	48167	79	73	0	73	0	0	53	0	36	0	2	15	46	0
481677222001026	48167	219	173	24	72	1	77	190	20	86	0	3	81	137	20
481677228001017	48167	126	91	15	70	3	3	124	42	52	0	5	25	105	40
481677228001031	48167	142	103	29	70	1	3	112	50	34	0	0	28	95	46
481677256004005	48167	562	351	137	70	14	131	342	141	81	13	28	92	303	130
481677209004006	48167	474	327	158	69	0	100	342	133	45	0	7	157	233	103
481677219012017	48167	520	380	234	68	33	45	69	15	27	6	10	17	43	15
481677232001008	48167	268	180	74	67	16	22	429	130	149	16	24	126	331	108
481677227001012	48167	116	69	0	66	0	2	40	0	32	0	1	7	34	0
481677219023074	48167	112	82	17	64	0	1	118	8	88	0	0	22	82	8
481677233005000	48167	259	177	61	63	14	39	65	42	7	3	5	11	54	37
481677219012011	48167	352	257	99	62	32	64	466	122	177	27	31	136	338	94
481677223004029	48167	176	106	36	62	0	8	148	72	20	0	1	55	120	60
481677219022018	48167	259	178	73	61	5	39	201	44	115	1	2	40	147	34
481677233002032	48167	173	118	26	61	15	16	123	54	21	4	10	38	83	40
481677242003003	48167	315	242	90	60	39	53	385	160	52	31	43	130	303	133
481677207024008	48167	363	258	138	59	22	39	419	234	46	64	72	67	296	154
481677215022001	48167	939	797	653	59	52	34	945	781	30	17	37	97	861	724
481677246001058	48167	121	63	5	58	0	0	65	4	50	0	3	8	45	2
481677222003025	48167	117	109	41	58	0	10	94	49	25	0	1	19	94	49
481677256001006	48167	296	250	70	57	1	121	154	83	18	6	7	46	125	71
481677212072008	48167	200	139	44	56	0	39	185	141	9	12	18	17	129	94
481677230003012	48167	159	108	33	56	0	19	93	21	39	0	0	33	89	21
481677220011013	48167	454	389	276	56	14	43	414	267	22	2	10	115	350	238
481677227004009	48167	66	61	0	55	3	2	61	1	40	0	8	12	46	0
481677227001015	48167	97	57	0	55	0	2	55	2	42	0	1	10	42	2
481677206032000	48167	664	481	318	55	37	71	1,110	564	182	50	88	276	837	470
481677244003024	48167	233	172	85	55	0	33	204	64	108	0	2	30	203	64
481677207023000	48167	335	238	127	54	21	36	610	325	59	39	97	129	515	273
481677227002009	48167	54	54	0	54	0	0	117	9	96	0	2	10	81	8
481677219021036	48167	348	176	41	54	0	81	203	93	39	0	2	69	145	62
481677227001014	48167	91	54	0	54	0	0	45	1	27	0	4	13	34	1
481677226001025	48167	126	88	22	54	0	12	76	4	54	0	3	15	53	4
481677230001016	48167	125	107	28	53	0	26	117	47	36	4	5	29	97	45
481677223004042	48167	213	127	18	53	0	57	69	27	19	0	1	22	58	21
481677230001015	48167	88	75	9	52	0	15	111	19	65	0	2	25	86	17
481677231002004	48167	112	82	24	52	0	7	115	33	52	0	3	27	92	29
481677219023073	48167	87	64	5	52	2	5	85	12	61	0	3	9	53	3
481677219012015	48167	265	193	72	51	26	45	189	57	60	8	11	61	148	45
481677237003015	48167	74	56	2	51	0	3	56	14	28	0	0	14	43	11

GEOID20	PL_T18_B	PL_T18_A	PL_T18_O	PL_T18_H	HU_Tot	HU_Occ	HU_Vac	HHPop	GQ	GalvDist	Map 1	Map 2	VTDID20	% Cornyn	Est R
481677207021009	45	17	34	112	326	315	11	721	0	4	4	3	481670454	61%	338
481677219023071	84	0	9	12	66	57	9	189	0	3	3	4	481670338	38%	47
481677219012019	94	8	24	70	210	181	29	375	0	3	3	4	481670301	43%	126
481677226001002	2	0	3	8	9	8	1	30	0	3	3	1	481670347	28%	5
481677238001007	81	0	0	23	119	88	31	212	0	3	3	2	481670330	35%	54
481677219022017	75	4	5	21	120	113	7	208	0	3	3	1	481670347	28%	44
481677227004012	35	0	1	10	27	22	5	53	0	3	3	4	481670336	12%	6
481677222001026	54	0	3	60	86	86	0	190	0	3	3	2	481670345	17%	23
481677228001017	42	0	5	18	68	68	0	124	0	3	3	2	481670330	35%	37
481677228001031	23	0	0	26	59	59	0	112	0	3	3	2	481670330	35%	33
481677256004005	73	13	16	84	239	220	19	342	0	2	2	2	481670224	50%	152
481677209004006	34	0	2	94	369	137	232	342	0	4	4	4	481670439	67%	156
481677219012017	20	3	3	5	21	21	0	69	0	3	3	4	481670301	43%	18
481677232001008	114	15	20	89	169	169	0	429	0	2	2	4	481670219	53%	175
481677227001012	32	0	1	1	16	13	3	40	0	3	3	4	481670336	12%	4
481677219023074	60	0	0	14	47	36	11	118	0	3	3	4	481670338	38%	32
481677233005000	7	3	3	7	28	24	4	65	0	2	2	4	481670219	53%	28
481677219012011	129	21	25	90	142	138	4	466	0	3	3	4	481670301	43%	144
481677223004029	16	0	1	43	55	54	1	148	0	1	1	1	481670142	54%	65
481677219022018	81	1	2	30	119	105	14	201	0	3	3	1	481670347	28%	41
481677233002032	16	3	8	19	43	43	0	123	0	2	2	4	481670219	53%	44
481677242003003	43	26	38	89	202	176	26	385	0	3	3	2	481670306	39%	120
481677207024008	33	58	65	44	125	125	0	419	0	4	4	3	481670454	61%	180
481677215022001	30	17	32	75	601	512	89	945	0	1	1	1	481670167	70%	605
481677246001058	37	0	3	3	30	30	0	65	0	3	3	2	481670311	21%	9
481677222003025	25	0	1	19	1	1	0	0	94	1	1	1	481670146	61%	57
481677256001006	15	6	7	32	159	68	91	154	0	2	2	2	481670224	50%	63
481677212072008	9	11	16	10	60	55	5	185	0	1	1	3	481670170	68%	88
481677230003012	39	0	0	29	41	41	0	93	0	3	3	4	481670331	21%	18
481677220011013	20	1	5	87	176	169	7	414	0	1	1	1	481670150	60%	212
481677227004009	37	0	6	3	17	17	0	61	0	3	3	4	481670336	12%	6
481677227001015	35	0	1	4	18	18	0	55	0	3	3	4	481670336	12%	5
481677206032000	122	37	57	188	602	540	62	1,110	0	2	2	4	481670220	62%	519
481677244003024	107	0	2	30	198	194	4	204	0	3	3	2	481670314	28%	57
481677207023000	50	32	85	107	353	345	8	610	0	4	4	3	481670454	61%	314
481677227002009	68	0	2	3	46	44	2	117	0	3	3	4	481670336	12%	10
481677219021036	37	0	0	46	106	98	8	203	0	3	3	1	481670347	28%	40
481677227001014	27	0	1	5	17	16	1	45	0	3	3	4	481670336	12%	4
481677226001025	37	0	1	11	32	32	0	76	0	3	3	1	481670336	12%	6
481677230001016	26	4	4	22	66	58	8	117	0	3	3	4	481670331	21%	20
481677223004042	19	0	0	18	87	40	47	69	0	3	3	1	481670343	43%	25
481677230001015	49	0	2	18	50	43	7	111	0	3	3	4	481670331	21%	18
481677231002004	41	0	2	20	42	34	8	115	0	3	3	4	481670338	38%	35
481677219023073	41	0	2	7	35	35	0	85	0	3	3	4	481670338	38%	20
481677219012015	48	7	9	46	80	80	0	189	0	3	3	4	481670301	43%	63
481677237003015	24	0	0	8	34	34	0	56	0	3	3	4	481670334	23%	10

GEOID20	cnt_202	acs_pp_	acs_cv_	ac_WNH	ac_BNH	ac_ONH	a_HISP	PL_Totl	PL_T_WN	PL_T_BN	PL_T_AS	PL_T_ON	PL_T_HI	PL_Tt18	PL_T18_W
481677233002028	48167	170	116	33	49	8	25	520	277	76	26	47	120	350	180
481677232001013	48167	369	248	128	49	7	63	978	373	291	20	40	274	694	279
481677230001012	48167	60	51	1	49	0	1	86	0	74	0	2	10	63	0
481677226001030	48167	144	101	28	49	1	23	84	27	27	0	2	28	78	23
481677227004002	48167	88	81	9	49	0	23	83	3	55	0	2	23	53	3
481677230003014	48167	92	62	6	48	0	8	79	11	51	0	1	16	59	11
481677232001033	48167	192	129	53	48	11	16	637	248	199	26	34	156	459	185
481677219023069	48167	130	95	24	48	2	21	14	4	1	0	3	6	10	4
481677231003000	48167	152	143	68	48	2	26	159	53	64	1	15	27	130	48
481677230001011	48167	56	48	1	47	0	0	82	9	62	0	7	4	62	9
481677206032003	48167	223	162	66	47	9	40	320	144	55	9	21	100	218	94
481677219021019	48167	357	181	78	46	0	56	193	85	64	8	8	36	168	81
481677256004000	48167	249	156	68	46	6	36	216	58	30	9	13	115	161	50
481677242002006	48167	223	132	40	46	8	37	232	78	38	37	42	74	190	70
481677227001011	48167	89	52	0	46	0	6	42	3	32	0	4	3	37	3
481677221002011	48167	75	66	13	46	0	8	72	26	12	0	0	34	52	18
481677206011006	48167	223	162	60	46	11	45	190	45	68	6	16	61	137	35
481677230002008	48167	56	50	3	45	0	2	96	4	70	0	2	20	74	4
481677236002045	48167	96	64	15	45	0	4	97	21	48	0	0	28	86	21
481677222001036	48167	108	85	10	45	1	30	50	9	34	0	0	7	40	6
481677227002008	48167	44	44	0	44	0	0	84	10	65	0	3	6	68	9
481677232002023	48167	306	220	71	44	16	88	171	85	42	0	8	36	133	79
481677211012004	48167	220	126	47	44	11	24	116	6	13	2	2	95	74	3
481677242003007	48167	310	238	52	44	102	40	263	78	63	69	73	49	234	72
481677247002036	48167	83	68	15	44	0	9	54	14	21	0	1	18	46	14
481677219021026	48167	186	94	33	43	0	18	183	36	62	0	7	78	136	35
481677207021000	48167	304	216	117	43	13	43	397	282	9	8	26	80	295	213
481677227002002	48167	43	43	0	43	0	0	62	2	53	0	1	6	34	2
481677219021018	48167	156	79	6	42	0	31	81	4	35	5	6	36	57	3
481677219021028	48167	270	137	57	42	0	38	176	60	50	0	1	65	141	55
481677256003002	48167	982	623	404	42	40	137	782	492	74	60	85	131	705	454
481677217031005	48167	248	190	97	41	6	45	204	90	38	17	22	54	161	79
481677230002005	48167	47	42	0	41	0	0	65	3	40	2	2	20	57	3
481677207024000	48167	295	209	113	41	13	42	399	232	54	55	67	46	268	162
481677212072007	48167	143	99	40	41	0	18	155	108	8	1	14	25	125	91
481677214031000	48167	1,820	1,143	863	41	95	144	961	638	50	29	63	210	776	525
481677231002013	48167	185	136	77	41	0	18	132	70	32	0	9	21	123	69
481677206021000	48167	1,069	774	574	41	59	100	918	547	126	40	56	189	696	432
481677228001020	48167	62	45	3	41	1	0	67	12	52	0	0	3	46	12
481677231002009	48167	132	97	45	40	1	11	100	40	41	0	3	16	75	35
481677227004011	48167	43	40	0	40	0	0	43	0	29	0	4	10	30	0
481677206032005	48167	197	143	58	39	24	22	26	5	3	0	13	5	15	5
481677220022000	48167	165	128	36	39	20	33	134	80	19	1	1	34	123	72
481677212071000	48167	875	542	411	39	7	85	856	441	125	52	84	206	612	326
481677221002007	48167	91	80	33	39	0	9	84	58	8	1	3	15	57	40
481677207012000	48167	240	171	91	39	15	26	136	97	11	0	2	26	97	69

GEOID20	PL_T18_B	PL_T18_A	PL_T18_O	PL_T18_H	HU_Tot	HU_Occ	HU_Vac	HHPop	GQ	GalvDist	Map 1	Map 2	VTDID20	% Cornyn	Est R
481677233002028	47	23	41	82	160	160	0	520	0	2	2	4	481670219	53%	185
481677232001013	195	20	39	181	345	345	0	978	0	2	2	4	481670219	53%	366
481677230001012	51	0	2	10	34	34	0	86	0	3	3	4	481670331	21%	13
481677226001030	27	0	2	26	42	31	11	84	0	3	3	1	481670336	12%	9
481677227004002	36	0	2	12	28	25	3	83	0	3	3	4	481670336	12%	6
481677230003014	34	0	1	13	35	27	8	79	0	3	3	4	481670331	21%	12
481677232001033	135	24	28	111	215	210	5	637	0	2	2	4	481670219	53%	242
481677219023069	0	0	3	3	1	1	0	14	0	3	3	4	481670301	43%	4
481677231003000	48	1	15	19	72	61	11	159	0	3	3	4	481670338	38%	50
481677230001011	44	0	5	4	35	21	14	82	0	3	3	4	481670331	21%	13
481677206032003	33	9	19	72	193	117	76	320	0	2	2	4	481670220	62%	135
481677219021019	54	5	5	28	143	130	13	193	0	3	3	1	481670347	28%	47
481677256004000	26	7	10	75	102	95	7	216	0	2	2	2	481670224	50%	81
481677242002006	31	27	31	58	170	134	36	232	0	3	3	2	481670306	39%	75
481677227001011	28	0	3	3	17	10	7	42	0	3	3	4	481670336	12%	5
481677221002011	11	0	0	23	22	22	0	72	0	1	1	1	481670146	61%	32
481677206011006	49	6	10	43	96	95	1	190	0	2	2	4	481670283	62%	84
481677230002008	57	0	1	12	34	34	0	96	0	3	3	4	481670331	21%	15
481677236002045	40	0	0	25	42	37	5	97	0	3	3	4	481670334	23%	20
481677222001036	29	0	0	5	39	38	1	50	0	3	3	2	481670345	17%	7
481677227002008	50	0	3	6	42	42	0	84	0	3	3	4	481670336	12%	8
481677232002023	30	0	8	16	133	69	64	171	0	2	2	2	481670226	70%	93
481677211012004	12	2	2	57	30	29	1	116	0	3	3	3	481670398	42%	31
481677242003007	53	57	61	48	166	148	18	263	0	3	3	2	481670306	39%	92
481677247002036	18	0	1	13	36	26	10	54	0	3	3	2	481670314	28%	13
481677219021026	41	0	7	53	89	86	3	183	0	3	3	1	481670347	28%	38
481677207021000	5	8	18	59	144	134	10	397	0	4	4	3	481670454	61%	180
481677227002002	32	0	0	0	27	27	0	62	0	3	3	4	481670336	12%	4
481677219021018	28	5	6	20	32	31	1	81	0	3	3	1	481670347	28%	16
481677219021028	34	0	0	52	110	90	20	176	0	3	3	1	481670347	28%	39
481677256003002	64	57	77	110	575	503	72	782	0	2	2	2	481670224	50%	353
481677217031005	29	17	22	31	74	70	4	204	0	1	1	1	481670159	64%	103
481677230002005	40	2	2	12	27	27	0	65	0	3	3	4	481670331	21%	12
481677207024000	35	38	41	30	115	115	0	399	0	4	4	3	481670454	61%	163
481677212072007	6	0	8	20	45	45	0	155	0	1	1	3	481670170	68%	85
481677214031000	48	20	46	157	509	487	22	961	0	1	1	1	481670152	68%	524
481677231002013	32	0	6	16	23	15	8	52	80	3	3	4	481670338	38%	47
481677206021000	86	40	53	125	385	385	0	918	0	2	2	4	481670283	62%	428
481677228001020	34	0	0	0	28	28	0	67	0	3	3	2	481670330	35%	16
481677231002009	28	0	2	10	43	42	1	100	0	3	3	4	481670338	38%	29
481677227004011	23	0	4	3	18	3	15	43	0	3	3	4	481670336	12%	4
481677206032005	3	0	7	0	2	0	2	26	0	2	2	4	481670220	62%	9
481677220022000	18	1	1	32	108	93	15	134	0	1	1	1	481670142	54%	66
481677212071000	89	40	55	142	386	366	20	856	0	1	1	1	481670193	66%	406
481677221002007	8	1	3	6	35	35	0	84	0	1	1	1	481670148	61%	35
481677207012000	7	0	2	19	47	47	0	136	0	4	4	3	481670454	61%	59

GEOID20	cnt_202	acs_pp_	acs_cv_	ac_WNH	ac_BNH	ac_ONH	a_HISP	PL_Totl	PL_T_WN	PL_T_BN	PL_T_AS	PL_T_ON	PL_T_HI	PL_Tt18	PL_T18_W
481677231003001	48167	111	105	39	39	1	27	482	122	247	11	33	80	405	117
481677223004000	48167	126	76	12	39	0	25	111	26	24	0	6	55	80	20
481677231002003	48167	104	76	21	38	0	16	97	28	48	0	6	15	67	24
481677230003020	48167	101	69	26	38	0	5	73	18	30	0	2	23	63	16
481677227004007	48167	71	65	14	38	0	13	208	28	136	0	3	41	159	18
481677219011000	48167	102	74	18	38	1	17	227	41	114	0	7	65	175	35
481677205014000	48167	782	577	417	38	35	87	1,065	657	84	114	135	189	753	476
481677219011009	48167	334	244	133	37	15	58	2,122	806	575	47	132	609	1,513	623
481677227002011	48167	37	37	0	37	0	0	68	5	57	0	3	3	56	5
481677242002007	48167	146	87	26	37	6	18	120	51	38	9	16	15	120	51
481677211021018	48167	284	141	82	37	1	21	169	72	16	1	5	76	131	65
481677221002005	48167	81	71	27	37	0	7	73	27	10	0	8	28	55	24
481677229002000	48167	86	61	9	37	0	15	73	12	28	0	2	31	57	10
481677219011014	48167	191	139	69	37	5	30	151	49	46	3	6	50	103	33
481677230002010	48167	62	55	15	37	0	3	81	20	29	4	4	28	66	20
481677227001004	48167	184	109	54	36	0	19	140	66	55	3	7	12	132	64
481677231002015	48167	75	55	5	36	1	14	76	13	35	0	8	20	65	13
481677217031008	48167	145	111	61	36	4	10	126	59	35	5	10	22	103	52
481677223004035	48167	109	65	20	36	0	10	99	44	9	0	0	46	75	34
481677220013025	48167	309	264	111	36	11	106	305	139	33	7	9	124	228	113
481677242002008	48167	187	111	37	36	4	34	234	81	63	26	42	48	195	77
481677205061006	48167	471	301	229	35	17	20	553	334	39	46	79	101	397	247
481677230003010	48167	126	85	40	35	0	11	251	65	139	2	4	43	240	60
481677212072009	48167	156	108	43	35	0	30	137	100	4	9	16	17	100	72
481677227004003	48167	55	50	0	35	1	14	49	3	39	0	1	6	32	2
481677211022009	48167	316	181	125	35	9	12	168	125	14	0	12	17	118	93
481677232002012	48167	168	121	44	35	1	40	176	56	70	0	1	49	139	51
481677251003010	48167	51	38	1	35	0	2	50	3	34	0	3	10	23	3
481677223004001	48167	185	111	58	34	0	18	123	70	8	0	2	43	100	58
481677206033000	48167	499	361	261	34	24	42	449	263	51	9	17	118	342	202
481677211012007	48167	101	57	4	34	3	16	139	28	25	10	11	75	107	21
481677231002001	48167	63	47	5	34	0	7	90	9	58	3	9	14	54	5
481677237003002	48167	83	63	27	34	0	2	56	4	44	0	0	8	39	4
481677220013028	48167	57	49	2	34	0	13	81	21	19	7	8	33	51	16
481677222004008	48167	69	61	14	34	0	13	86	18	56	0	3	9	75	18
481677233005002	48167	389	266	144	33	27	61	281	214	11	0	3	53	240	181
481677205122000	48167	444	301	170	33	44	54	298	180	20	39	56	42	219	128
481677211023000	48167	225	146	90	33	0	24	499	137	64	1	8	290	321	100
481677212102001	48167	683	426	329	32	17	48	262	196	15	5	18	33	205	154
481677236003000	48167	208	174	115	32	0	26	157	136	0	0	3	18	136	119
481677212032007	48167	355	246	175	32	21	18	297	177	47	14	24	49	271	160
481677212113004	48167	492	307	210	32	43	22	234	157	33	19	23	21	174	114
481677219023075	48167	124	90	45	32	5	9	125	30	60	0	8	27	68	13
481677221002009	48167	54	48	11	32	0	5	45	22	9	1	6	8	36	21
481677231002006	48167	162	119	66	32	1	20	390	147	148	5	11	84	341	137
481677219011011	48167	174	127	66	32	0	30	144	54	36	5	12	42	101	38

GEOID20	PL_T18_B	PL_T18_A	PL_T18_O	PL_T18_H	HU_Tot	HU_Occ	HU_Vac	HHPop	GQ	GalvDist	Map 1	Map 2	VTDID20	% Cornyn	Est R
481677231003001	200	11	32	56	296	288	8	482	0	3	3	4	481670338	38%	156
481677223004000	20	0	3	37	46	45	1	111	0	3	3	1	481670343	43%	34
481677231002003	35	0	1	7	42	42	0	97	0	3	3	4	481670338	38%	26
481677230003020	28	0	2	17	30	30	0	73	0	3	3	4	481670331	21%	13
481677227004007	104	0	3	34	83	83	0	208	0	3	3	4	481670336	12%	19
481677219011000	89	0	5	46	80	80	0	227	0	3	3	4	481670301	43%	74
481677205014000	59	83	97	121	341	341	0	1,065	0	4	4	3	481670464	68%	509
481677219011009	390	38	103	397	851	764	87	2,122	0	3	3	4	481670338	38%	582
481677227002011	47	0	1	3	42	27	15	68	0	3	3	4	481670336	12%	7
481677242002007	38	9	16	15	122	114	8	120	0	3	3	2	481670306	39%	47
481677211021018	13	0	2	51	72	68	4	169	0	1	3	3	481670192	62%	81
481677221002005	4	0	7	20	27	15	12	73	0	1	1	1	481670148	61%	34
481677229002000	21	0	2	24	30	30	0	73	0	2	3	4	481670232	50%	29
481677219011014	28	3	5	37	59	53	6	151	0	3	3	4	481670338	38%	40
481677230002010	23	4	4	19	35	35	0	81	0	3	3	4	481670331	21%	14
481677227001004	54	3	6	8	1	0	1	21	119	3	3	4	481670336	12%	16
481677231002015	29	0	7	16	25	25	0	76	0	3	3	4	481670338	38%	25
481677217031008	25	5	7	19	42	39	3	126	0	1	1	1	481670159	64%	66
481677223004035	9	0	0	32	35	35	0	99	0	1	1	1	481670142	54%	40
481677220013025	26	7	9	80	124	116	8	305	0	1	1	1	481670150	60%	138
481677242002008	45	25	41	32	161	120	41	210	24	3	3	2	481670306	39%	77
481677205061006	34	38	51	65	179	179	0	553	0	4	4	3	481670488	65%	258
481677230003010	138	2	3	39	172	172	0	251	0	3	3	4	481670331	21%	49
481677212072009	4	9	13	11	51	51	0	137	0	1	1	3	481670170	68%	68
481677227004003	25	0	1	4	20	20	0	49	0	3	3	4	481670336	12%	4
481677211022009	9	0	4	12	81	78	3	168	0	1	1	1	481670197	68%	80
481677232002012	51	0	1	36	81	81	0	176	0	2	2	2	481670226	70%	97
481677251003010	16	0	0	4	18	18	0	50	0	3	3	2	481670314	28%	6
481677223004001	8	0	2	32	50	44	6	123	0	1	1	1	481670142	54%	54
481677206033000	43	9	17	80	171	164	7	449	0	2	2	4	481670220	62%	212
481677211012007	24	10	11	51	45	45	0	139	0	3	3	3	481670398	42%	45
481677231002001	30	3	9	10	21	16	5	90	0	3	3	4	481670338	38%	21
481677237003002	34	0	0	1	30	22	8	56	0	3	3	4	481670334	23%	9
481677220013028	10	7	8	17	32	28	4	81	0	1	1	1	481670150	60%	31
481677222004008	47	0	3	7	68	62	6	86	0	3	3	2	481670345	17%	13
481677233005002	11	0	3	45	119	119	0	281	0	2	2	4	481670219	53%	127
481677205122000	19	35	39	33	95	95	0	298	0	4	4	3	481670487	67%	146
481677211023000	41	1	1	179	203	176	27	499	0	3	3	3	481670341	51%	164
481677212102001	15	5	18	18	119	97	22	262	0	1	1	1	481670165	69%	142
481677236003000	0	0	1	16	94	84	10	157	0	2	2	2	481670226	70%	95
481677212032007	39	14	24	48	224	213	11	297	0	4	4	3	481670453	64%	173
481677212113004	33	11	12	15	76	74	2	234	0	1	1	1	481670165	69%	121
481677219023075	38	0	2	15	42	30	12	125	0	3	3	4	481670338	38%	26
481677221002009	9	0	0	6	22	22	0	45	0	1	1	1	481670146	61%	22
481677231002006	125	5	11	68	266	248	18	390	0	3	3	4	481670338	38%	131
481677219011011	24	0	5	34	48	48	0	144	0	3	3	4	481670338	38%	39

GEOID20	cnt_202	acs_pp_	acs_cv_	ac_WNH	ac_BNH	ac_ONH	a_HISP	PL_Totl	PL_T_WN	PL_T_BN	PL_T_AS	PL_T_ON	PL_T_HI	PL_Tt18	PL_T18_W
481677258003006	48167	249	168	96	32	1	40	198	111	10	2	3	74	165	106
481677230001005	48167	39	33	2	32	0	0	63	4	49	0	2	8	43	1
481677230003018	48167	91	62	22	32	0	8	61	10	29	0	1	21	51	10
481677205082002	48167	208	140	71	31	13	25	372	217	48	32	39	68	263	145
481677242003000	48167	197	152	52	31	32	36	353	133	57	82	96	67	311	116
481677212053009	48167	150	104	48	31	0	25	135	112	1	0	1	21	103	85
481677220021008	48167	162	133	68	31	5	29	231	51	104	2	4	72	188	48
481677231001001	48167	132	92	35	31	7	18	145	45	50	1	4	46	133	40
481677230002006	48167	64	57	19	31	0	7	85	10	24	3	7	44	59	10
481677205013000	48167	857	632	470	31	35	96	469	350	15	24	43	61	387	294
481677228001026	48167	56	41	9	31	0	1	63	11	36	0	0	16	41	9
481677251003024	48167	87	65	18	31	0	17	78	7	41	0	2	28	51	3
481677215012001	48167	356	289	172	31	12	75	674	429	93	22	41	111	556	378
481677223004038	48167	106	63	17	31	0	16	79	14	6	0	0	59	64	14
481677256001003	48167	477	402	283	31	35	54	211	174	17	1	6	14	206	174
481677207033000	48167	824	528	342	30	103	53	733	383	122	43	69	159	666	360
481677220022006	48167	139	107	52	30	0	24	133	72	9	0	8	44	112	66
481677220023015	48167	99	61	21	30	0	10	71	28	24	0	0	19	59	25
481677223004030	48167	90	54	15	30	0	9	41	17	10	1	1	13	36	17
481677247002031	48167	92	75	26	30	15	3	82	43	23	0	4	12	76	40
481677227002016	48167	40	40	10	30	0	0	98	10	66	0	2	20	79	9
481677223004013	48167	104	62	17	30	0	15	58	25	17	1	1	15	42	19
481677211012009	48167	150	86	32	30	8	17	174	67	30	2	4	73	151	63
481677226001029	48167	122	85	40	30	1	15	117	31	30	0	5	51	87	25
481677237003005	48167	51	39	7	30	0	2	58	20	32	0	0	6	31	4
481677211022012	48167	432	247	70	30	3	144	346	62	16	0	2	266	209	40
481677231002007	48167	104	76	34	30	0	12	91	22	37	3	8	24	75	17
481677211021006	48167	185	92	49	29	3	11	142	43	21	0	2	76	92	28
481677219011020	48167	112	82	40	29	4	8	160	43	66	8	11	40	126	42
481677212072006	48167	84	58	14	29	0	15	70	43	8	0	9	10	52	34
481677230001017	48167	42	36	2	29	0	5	55	4	40	0	2	9	46	4
481677227004006	48167	79	73	26	29	2	16	56	22	32	0	0	2	39	16
481677230002009	48167	53	47	7	29	9	2	52	10	22	3	3	17	46	10
481677212053008	48167	341	225	94	29	3	100	283	199	11	14	28	45	217	151
481677242001004	48167	392	330	231	28	36	35	356	271	1	36	47	37	327	245
481677231002014	48167	59	44	9	28	0	7	61	12	17	3	6	26	52	12
481677206051000	48167	650	478	340	28	50	59	227	167	4	0	9	47	188	141
481677205063002	48167	339	216	162	28	3	24	262	186	6	5	8	62	203	143
481677222004005	48167	54	48	15	28	0	5	53	18	29	0	3	3	47	18
481677240001019	48167	559	510	297	28	30	156	6	0	3	1	1	2	6	0
481677211012011	48167	98	56	10	27	3	15	64	13	9	0	4	38	44	10
481677220023000	48167	69	42	13	27	0	2	56	24	8	0	0	24	53	24
481677236002012	48167	54	36	6	27	0	3	47	7	20	0	2	18	36	3
481677212091019	48167	162	101	9	27	3	62	77	12	17	2	5	43	62	12
481677219011013	48167	140	102	43	27	9	23	124	50	24	2	6	44	88	44
481677206051034	48167	338	249	202	27	9	11	153	134	8	1	2	9	126	110

GEOID20	PL_T18_B	PL_T18_A	PL_T18_O	PL_T18_H	HU_Tot	HU_Occ	HU_Vac	HHPop	GQ	GalvDist	Map 1	Map 2	VTDID20	% Cornyn	Est R
481677258003006	10	2	2	47	90	88	2	198	0	2	2	2	481670223	47%	78
481677230001005	39	0	2	1	31	23	8	63	0	3	3	4	481670331	21%	9
481677230003018	23	0	1	17	24	24	0	61	0	3	3	4	481670331	21%	10
481677205082002	42	20	27	49	123	123	0	372	0	4	4	3	481670488	65%	171
481677242003000	41	81	93	61	170	85	85	171	182	3	3	2	481670306	39%	123
481677212053009	1	0	1	16	49	49	0	135	0	1	1	3	481670170	68%	70
481677220021008	80	2	4	56	141	141	0	231	0	1	1	1	481670142	54%	101
481677231001001	50	1	1	42	58	57	1	145	0	3	3	4	481670338	38%	51
481677230002006	18	2	5	26	32	32	0	85	0	3	3	4	481670331	21%	12
481677205013000	15	21	29	49	189	183	6	469	0	4	4	3	481670464	68%	262
481677228001026	24	0	0	8	30	16	14	63	0	3	3	2	481670330	35%	14
481677251003024	32	0	2	14	36	36	0	78	0	3	3	2	481670315	35%	18
481677215012001	60	20	36	82	392	355	37	674	0	1	1	1	481670167	70%	390
481677223004038	6	0	0	44	33	33	0	79	0	3	3	1	481670343	43%	27
481677256001003	13	1	6	13	254	148	106	211	0	2	2	2	481670224	50%	103
481677207033000	108	40	57	141	487	444	43	733	0	4	4	3	481670471	59%	391
481677220022006	9	0	5	32	49	49	0	133	0	1	1	1	481670142	54%	60
481677220023015	20	0	0	14	35	35	0	71	0	1	1	1	481670148	61%	36
481677223004030	8	1	1	10	27	27	0	41	0	3	3	1	481670343	43%	15
481677247002031	21	0	4	11	54	48	6	82	0	3	3	2	481670314	28%	21
481677227002016	59	0	2	9	38	27	11	98	0	3	3	4	481670336	12%	10
481677223004013	11	1	1	11	29	29	0	58	0	1	1	1	481670142	54%	23
481677211012009	28	2	4	56	81	81	0	174	0	3	3	3	481670398	42%	63
481677226001029	26	0	4	32	45	45	0	117	0	3	3	1	481670336	12%	11
481677237003005	27	0	0	0	16	15	1	58	0	3	3	4	481670334	23%	7
481677211022012	12	0	2	155	107	107	0	346	0	3	3	3	481670341	51%	107
481677231002007	32	2	7	19	40	38	2	91	0	3	3	4	481670338	38%	29
481677211021006	16	0	2	46	54	54	0	142	0	1	3	3	481670192	62%	57
481677219011020	49	8	8	27	78	78	0	160	0	3	3	4	481670338	38%	48
481677212072006	8	0	4	6	26	26	0	70	0	1	1	3	481670170	68%	35
481677230001017	33	0	0	9	20	19	1	55	0	3	3	4	481670331	21%	9
481677227004006	22	0	0	1	25	23	2	56	0	3	3	4	481670336	12%	5
481677230002009	21	3	3	12	28	28	0	52	0	3	3	4	481670331	21%	9
481677212053008	11	13	20	35	96	83	13	283	0	1	1	3	481670170	68%	148
481677242001004	1	36	47	34	292	239	53	356	0	1	3	2	481671051	48%	157
481677231002014	17	3	3	20	17	17	0	61	0	3	3	4	481670338	38%	20
481677206051000	4	0	9	34	97	92	5	227	0	2	2	4	481670220	62%	117
481677205063002	6	5	8	46	92	92	0	262	0	2	4	3	481670263	67%	137
481677222004005	23	0	3	3	50	48	2	53	0	3	3	2	481670345	17%	8
481677240001019	3	1	1	2	1	1	0	6	0	1	3	2	481670105	51%	3
481677211012011	6	0	2	26	19	19	0	64	0	3	3	3	481670398	42%	18
481677220023000	8	0	0	21	23	23	0	56	0	1	1	1	481670148	61%	32
481677236002012	20	0	2	11	25	25	0	47	0	3	3	4	481670334	23%	8
481677212091019	17	2	3	30	31	31	0	77	0	3	3	3	481670399	50%	31
481677219011013	17	2	3	24	44	44	0	124	0	3	3	4	481670338	38%	34
481677206051034	8	1	2	6	68	66	2	153	0	2	2	4	481670220	62%	78

	1519	2020	2020	2020	2020			
Original	CVAP Total	PL Total	PL VAP Total	PL VAP BNH	PL VAP HISP			
Row Labels	Sum of acs_cv_	Sum of PL_Totl	Sum of PL_Tt18	Sum of PL_T18_B	Sum of PL_T18_H	% BNH VAP	% HISP VAP	% Min VAP
1	60,982	85,433	65,769	4,324	14,944	7%	23%	29%
2	62,872	95,596	73,739	5,748	14,634	8%	20%	28%
3	53,445	79,906	61,257	18,556	18,731	30%	31%	61%
4	57,047	89,747	66,617	3,661	11,850	5%	18%	23%
Grand Total	234,346	350,682	267,382	32,289	60,159	12%	22%	35%
Low	-8.8%	-8.9%	-8.4%					
Average	58,586	87,671	66,846					
High	7.3%	9.0%	10.3%					
	1519	2020	2020	2020	2020			
Map 1	CVAP Total	PL Total	PL VAP Total	PL VAP BNH	PL VAP HISP			
Row Labels	Sum of acs_cv_	Sum of PL_Totl	Sum of PL_Tt18	Sum of PL_T18_B	Sum of PL_T18_H	% BNH VAP	% HISP VAP	% Min VAP
1	61,610	87,659	66,625	4,589	15,017	7%	23%	29%
2	57,445	86,431	67,003	5,018	13,159	7%	20%	27%
3	59,945	88,633	68,547	19,235	20,371	28%	30%	58%
4	55,345	87,959	65,207	3,447	11,612	5%	18%	23%
Grand Total	234,346	350,682	267,382	32,289	60,159	12%	22%	35%
Low	-5.5%	-1.4%	-2.5%					
Average	58,586	87,671	66,846					
High	5.2%	1.1%	2.5%					
	1519	2020	2020	2020	2020			
Map2	CVAP Total	PL Total	PL VAP Total	PL VAP BNH	PL VAP HISP			
Row Labels	Sum of acs_cv_	Sum of PL_Totl	Sum of PL_Tt18	Sum of PL_T18_B	Sum of PL_T18_H	% BNH VAP	% HISP VAP	% Min VAP
1	61,215	87,689	66,641	6,332	16,404	10%	25%	34%
2	63,746	87,368	71,169	9,104	16,395	13%	23%	36%
3	55,319	88,111	64,704	4,716	14,908	7%	23%	30%
4	54,067	87,514	64,868	12,137	12,452	19%	19%	38%
Grand Total	234,346	350,682	267,382	32,289	60,159	12%	22%	35%
	-7.7%	-0.3%	-3.2%					
	58,586	87,671	66,846					
	8.8%	0.5%	6.5%					

Original				
Row Labels	Sum of PL_Tt18	Sum of Est R	Disaggregated %R	Precinct % R
1	65,769	43,607	66%	67%
2	73,739	48,456	66%	67%
3	61,257	19,833	32%	32%
4	66,617	45,283	68%	69%
Grand Total	267,382	157,180	59%	61%
Low	-8.4%			
Average	66,846			
High	10.3%			
Map 1				
Row Labels	Sum of PL_Tt18	Sum of Est R	Disaggregated %R	Precinct % R
1	66,625	44,022	66%	67%
2	67,003	44,363	66%	67%
3	68,547	24,354	36%	37%
4	65,207	44,442	68%	69%
Grand Total	267,382	157,180	59%	61%
Low	-2.5%			
Average	66,846			
High	2.5%			
Map2				
Row Labels	Sum of PL_Tt18	Sum of Est R	Disaggregated %R	Precinct % R
1	66,641	41,445	62%	64%
2	71,169	37,119	52%	56%
3	64,704	41,082	63%	65%
4	64,868	37,535	58%	60%
Grand Total	267,382	157,180	59%	61%
	-3.2%			
	66,846			
	6.5%			

VTDID20	REP	DEM	LBT	GRE	WF	PER_REP	DBIDEN	RTRUMP	PER_REP_1	GCollins	RCornyn	DHegar	LMcKennon	USSen20_PR	GALV_DIST	Map 1	Map 2	VTDID20
481670103	863	145	0	0	0	86%	158	860	84%	4	829	164	15	83%	1	3	2	481670103
481670104	629	118	0	0	0	84%	137	620	82%	1	613	126	12	83%	1	3	2	481670104
481670105	87	68	0	0	0	56%	78	83	52%	4	86	68	12	56%	1	3	2	481670105
481670142	892	677	0	0	0	57%	711	868	55%	13	852	688	30	55%	1	3	1	481670142
481670144	1162	481	41	0	0	71%	539	1,196	69%	13	1,172	510	31	70%	1	1	1	481670144
481670146	1302	759	0	0	0	63%	786	1,294	62%	21	1,269	753	39	63%	1	1	1	481670146
481670148	1570	925	0	0	0	63%	966	1,534	61%	12	1,534	921	49	62%	1	1	1	481670148
481670150	1004	585	0	0	0	63%	621	985	61%	12	969	588	33	62%	1	1	1	481670150
481670151	1743	513	0	0	0	77%	574	1,724	75%	20	1,678	532	53	76%	1	1	1	481670151
481670152	2512	1034	103	0	0	71%	1,241	2,437	66%	14	2,509	1,125	68	69%	1	1	1	481670152
481670159	1802	890	0	0	0	67%	948	1,809	66%	18	1,754	919	41	66%	1	1	1	481670159
481670165	2956	1171	0	0	0	72%	1,323	2,868	68%	17	2,919	1,194	84	71%	1	1	1	481670165
481670166	1512	616	84	0	0	71%	705	1,529	68%	10	1,526	646	78	70%	1	1	1	481670166
481670167	3065	1119	105	0	0	73%	1,326	3,009	69%	25	3,070	1,187	90	72%	1	1	1	481670167
481670168	2	0	0	0	0	100%	0	2	100%	0	2	0	0	100%	1	1	1	481670168
481670169	1	0	0	0	0	100%	0	1	100%	0	1	0	0	100%	3	1	1	481670169
481670170	1515	613	57	0	0	71%	726	1,486	67%	15	1,519	644	56	70%	1	1	3	481670170
481670172	291	80	0	0	0	78%	90	282	76%	2	279	89	4	76%	1	1	1	481670172
481670192	291	153	13	0	0	66%	173	295	63%	2	284	165	10	63%	1	1	3	481670192
481670193	1348	587	63	0	0	70%	693	1,324	66%	14	1,354	625	50	68%	1	1	1	481670193
481670197	419	184	0	0	0	69%	193	411	68%	4	418	179	15	70%	1	1	1	481670197
481670218	1098	1180	0	0	0	48%	1,243	1,049	46%	9	1,072	1,175	48	48%	2	2	2	481670218
481670219	1117	898	0	0	0	55%	934	1,097	54%	22	1,075	901	41	54%	2	2	4	481670219
481670220	2852	1580	138	0	0	64%	1,767	2,879	62%	25	2,897	1,652	98	64%	2	2	4	481670220
481670221	1225	478	0	0	0	72%	520	1,211	70%	6	1,229	476	19	72%	2	2	2	481670221
481670223	1082	1089	0	0	0	50%	1,150	1,047	48%	26	1,036	1,079	46	49%	2	2	2	481670223
481670224	1161	1133	0	0	0	51%	1,194	1,152	49%	21	1,171	1,111	36	51%	2	2	2	481670224
481670225	1878	450	44	0	0	81%	514	1,886	79%	12	1,897	476	30	80%	2	2	2	481670225
481670226	1274	486	30	0	0	72%	540	1,296	71%	5	1,284	512	30	71%	2	2	2	481670226
481670227	1879	363	53	0	0	84%	404	1,939	83%	7	1,887	389	49	83%	2	2	2	481670227
481670228	2079	340	44	0	0	86%	382	2,098	85%	12	2,087	354	41	85%	2	2	4	481670228
481670232	695	626	0	0	0	53%	643	698	52%	10	671	627	33	52%	2	3	4	481670232
481670258	1458	240	35	0	0	86%	276	1,488	84%	6	1,452	263	31	85%	2	2	4	481670258
481670263	4169	1739	171	0	0	71%	2,057	4,074	66%	26	4,175	1,872	122	69%	2	2	3	481670263

VTID20	REP	DEM	LBT	GRE	WF	PER_REP	DBIDEN	RTRUMP	PER_REP_1	GCollins	RCornyn	DHegar	LMcKennon	USSen20_PR	GALV_DIST	Map 1	Map 2	VTID20
481670274	471	153	0	0	0	75%	167	458	73%	2	466	151	10	76%	2	2	2	481670274
481670275	205	84	0	0	0	71%	97	195	67%	4	199	84	5	70%	2	2	2	481670275
481670276	1012	700	0	0	0	59%	766	972	56%	8	990	716	33	58%	2	2	2	481670276
481670277	1555	266	36	0	0	85%	291	1,596	85%	10	1,573	278	30	85%	2	2	2	481670277
481670278	1750	303	28	0	0	85%	332	1,780	84%	10	1,750	310	34	85%	2	2	2	481670278
481670279	762	136	18	0	0	85%	152	784	84%	4	766	147	15	84%	2	2	4	481670279
481670280	520	394	13	0	0	57%	426	537	56%	3	547	393	15	58%	2	2	4	481670280
481670281	104	38	2	0	0	73%	38	107	74%	0	108	37	1	74%	2	2	4	481670281
481670283	1567	860	62	0	0	65%	981	1,563	61%	18	1,570	915	48	63%	2	2	4	481670283
481670301	409	502	0	0	0	45%	520	397	43%	7	388	492	25	44%	3	3	4	481670301
481670306	1408	1911	0	0	0	42%	2,039	1,316	39%	52	1,338	1,916	84	41%	3	3	2	481670306
481670309	55	27	0	0	0	67%	27	54	67%	1	53	26	2	67%	3	3	2	481670309
481670311	138	484	0	0	0	22%	502	145	22%	14	133	475	17	22%	3	3	2	481670311
481670312	1	6	0	0	0	14%	6	1	14%	0	1	6	0	14%	3	3	4	481670312
481670314	687	1697	0	0	0	29%	1,778	666	27%	35	676	1,672	39	29%	3	3	2	481670314
481670315	889	1569	0	0	0	36%	1,615	866	35%	39	869	1,535	56	36%	3	3	2	481670315
481670316A	517	902	0	0	0	36%	926	534	37%	17	513	882	37	37%	3	3	2	481670316A
481670316B	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0%	3	3	2	481670316B
481670330	565	990	0	0	0	36%	1,018	569	36%	8	549	990	31	36%	3	3	2	481670330
481670331	331	1206	0	0	0	22%	1,236	336	21%	16	319	1,190	30	21%	3	3	4	481670331
481670334	189	623	13	0	0	23%	639	203	24%	12	194	629	6	24%	3	3	4	481670334
481670336	369	2355	0	0	0	14%	2,400	346	13%	20	333	2,356	29	12%	3	3	4	481670336
481670338	971	1464	0	0	0	40%	1,499	952	39%	15	951	1,457	48	39%	3	3	4	481670338
481670340	53	321	7	0	0	14%	332	53	14%	5	53	319	10	14%	3	3	3	481670340
481670341	443	377	24	0	0	54%	386	474	55%	9	444	392	23	53%	3	3	3	481670341
481670343	551	646	0	0	0	46%	672	550	45%	14	518	653	31	44%	3	3	1	481670343
481670345	90	391	0	0	0	19%	408	83	17%	7	81	394	4	17%	3	3	2	481670345
481670347	257	614	0	0	0	30%	632	253	29%	6	243	604	22	29%	3	3	1	481670347
481670389	154	252	6	0	0	38%	284	150	35%	2	152	265	8	36%	3	3	3	481670389
481670391	42	46	3	0	0	48%	49	48	49%	2	44	46	2	49%	3	3	3	481670391
481670394	7	11	0	0	0	39%	11	8	42%	0	7	11	0	39%	1	3	3	481670394
481670398	126	159	6	0	0	44%	174	131	43%	6	124	160	8	44%	3	3	3	481670398
481670399	82	82	2	0	0	50%	91	86	49%	0	84	82	3	51%	3	3	3	481670399
481670401	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0%	4	4	4	481670401

VTDID20	REP	DEM	LBT	GRE	WF	PER_REP	DBIDEN	RTRUMP	PER_REP_1	GCollins	RCornyn	DHegar	LMcKennon	USSen20_PR	GALV_DIST	Map 1	Map 2	VTDID20
481670439	1653	731	68	0	0	69%	821	1,670	67%	14	1,664	768	45	68%	4	4	4	481670439
481670453	2465	1239	104	0	0	67%	1,393	2,457	64%	20	2,474	1,299	88	66%	4	4	3	481670453
481670454	2041	1136	88	0	0	64%	1,305	1,977	60%	18	2,025	1,207	74	63%	4	4	3	481670454
481670455	909	475	37	0	0	66%	547	904	62%	9	893	519	28	63%	4	4	3	481670455
481670456	2111	559	53	0	0	79%	735	2,038	73%	13	2,105	612	43	77%	4	4	3	481670456
481670457	2644	811	100	0	0	77%	999	2,568	72%	14	2,631	894	65	75%	4	4	3	481670457
481670460	3127	775	91	0	0	80%	977	3,033	76%	13	3,097	863	76	78%	4	4	4	481670460
481670461	2286	629	63	0	0	78%	741	2,227	75%	14	2,246	699	54	76%	4	4	4	481670461
481670462	3206	943	98	0	0	77%	1,166	3,082	73%	15	3,211	1,024	55	76%	4	4	4	481670462
481670464	1636	646	67	0	0	72%	745	1,608	68%	8	1,610	707	56	69%	4	4	3	481670464
481670471	1111	697	60	0	0	61%	799	1,099	58%	8	1,125	740	42	60%	4	4	3	481670471
481670482	131	19	0	0	0	87%	22	129	85%	0	132	18	1	88%	4	4	4	481670482
481670487	3434	1502	137	0	0	70%	1,715	3,408	67%	16	3,450	1,591	103	68%	4	4	3	481670487
481670488	2040	923	82	0	0	69%	1,085	1,967	64%	16	2,011	989	77	67%	4	4	3	481670488
481670490	2408	1099	107	0	0	69%	1,248	2,382	66%	24	2,402	1,163	83	67%	4	1	3	481670490
481671051	227	225	0	0	0	50%	247	207	46%	11	225	227	5	50%	1	3	2	481671051
481671651	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0%	1	1	1	481671651
481672321	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0%	2	2	2	481672321
481672322	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0%	3	3	4	481672322
481672323	284	52	0	0	0	85%	54	287	84%	1	284	53	4	84%	2	2	2	481672323
481672801	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0%	3	3	4	481672801
481673061	0	0	0	0	0	0%	0	0	0%	0	0	0	0	0%	3	3	2	481673061
481673301	2	1	0	0	0	67%	1	2	67%	0	2	1	0	67%	3	3	2	481673301
481673311	114	124	0	0	0	48%	130	109	46%	1	110	122	3	47%	3	3	4	481673311
481674391	15	5	0	0	0	75%	6	13	68%	0	14	5	1	74%	3	3	4	481674391

Count of VTDID20	Column Labels																				
Row Labels	1	2	3	4	Grand Total																
481670103		207			207																
481670104		156			156																
481670105		22			22																
481670142	55				55																
481670144	57				57	Split VTD															
481670146	127				127																
481670148	197				197																
481670150	67				67																
481670151	221				221																
481670152	41				41																
481670159	220				220																
481670165	79				79																
481670166	139				139																
481670167	98				98																
481670168	27				27																
481670169	16				16																
481670170	2		34		36																
481670172	32				32																
481670192			26		26	Split VTD															
481670193	27				27																
481670197	37				37																
481670218		220			220																
481670219		1		64	65																
481670220				84	84																
481670221		185			185																
481670223		80			80	Sliver block - center is in VTD 223, mass is in D3															
481670224		64			64																
481670225		122			122																
481670226		154			154																
481670227		89			89																
481670228				75	75																
481670232				53	53																
481670258		34		41	75																
481670263			77	18	95	Split VTD															
481670274		22			22																
481670275		31			31																
481670276		88			88																
481670277		59			59																
481670278		59			59																
481670279				75	75																
481670280				20	20																
481670281				2	2																
481670283				65	65																
481670301				20	20	Sliver block - center is in VTD 301, mass is in D1															
481670306		383			383																
481670309		19			19																
481670311		203			203																
481670312				12	12																
481670314		305			305																
481670315		296			296																
481670316A		200			200																
481670316B		1			1																
481670330		180		4	184																

481670331			59	59	
481670334		2	72	74	Sliver block - center is in VTD 334, mass is in D2
481670336	32		61	93	
481670338			76	76	
481670340		52		52	
481670341		101		101	
481670343	239			239	
481670345		192		192	
481670347	72			72	
481670389		63		63	
481670391		11		11	
481670394		2		2	
481670398		17		17	
481670399		38		38	
481670401			1	1	
481670439			110	110	
481670453		125		125	
481670454		108		108	
481670455		40		40	
481670456		56		56	
481670457		55		55	
481670460			85	85	
481670461			59	59	
481670462			67	67	
481670464		40		40	
481670471		62		62	
481670482			23	23	
481670487		100		100	
481670488		48		48	
481670490	11	46		57	
481671051		29		29	
481671651	1			1	
481672321		3	1	4	Block 481677238001042 is in small hook that was rounded for compactness
481672322			4	4	
481672323		20		20	
481672801			1	1	
481673061		3		3	
481673301		8		8	
481673311			11	11	
481674391			4	4	
Grand Total	1,797	3,437	1,101	1,167	7,502

Count of VTDID20	Column Labels				Grand Total	
Row Labels	1	2	3	4	Grand Total	
481670103		207			207	
481670104		156			156	
481670105		22			22	
481670142	55				55	
481670144	57				57	
481670146	127				127	
481670148	197				197	
481670150	67				67	
481670151	221				221	
481670152	41				41	
481670159	220				220	
481670165	79				79	
481670166	139				139	
481670167	98				98	
481670168	27				27	
481670169	16				16	
481670170	2		34		36	Two slicer blocks on border with 1
481670172	32				32	
481670192			26		26	
481670193	27				27	
481670197	37				37	
481670218		220			220	
481670219		1		64	65	One block split off
481670220				84	84	
481670221		185			185	
481670223		80			80	
481670224		64			64	
481670225		122			122	
481670226		154			154	
481670227		89			89	
481670228				75	75	
481670232				53	53	
481670258		34		41	75	Split VTD
481670263			77	18	95	Split VTD
481670274		22			22	
481670275		31			31	
481670276		88			88	
481670277		59			59	
481670278		59			59	
481670279				75	75	
481670280				20	20	
481670281				2	2	
481670283				65	65	
481670301				20	20	
481670306		383			383	
481670309		19			19	
481670311		203			203	

Count of VTDID20	Column Labels				
Row Labels	1	2	3	4	Grand Total
481670312				12	12
481670314		305			305
481670315		296			296
481670316A		200			200
481670316B		1			1
481670330		180		4	184
481670331				59	59
481670334		2		72	74
481670336	32			61	93
481670338				76	76
481670340			52		52
481670341			101		101
481670343	239				239
481670345		192			192
481670347	72				72
481670389			63		63
481670391			11		11
481670394			2		2
481670398			17		17
481670399			38		38
481670401				1	1
481670439				110	110
481670453			125		125
481670454			108		108
481670455			40		40
481670456			56		56
481670457			55		55
481670460				85	85
481670461				59	59
481670462				67	67
481670464			40		40
481670471			62		62
481670482				23	23
481670487			100		100
481670488			48		48
481670490	11		46		57
481671051		29			29
481671651	1				1
481672321		3		1	4
481672322				4	4
481672323		20			20
481672801				1	1
481673061		3			3
481673301		8			8
481673311				11	11
481674391				4	4
Grand Total	1,797	3,437	1,101	1,167	7,502

Blocks split off for compactness

Sliver block - center is in VTD 334, mass is in D2

Split VTD

Block 481677238001042 is in small hook that was rounded for compactness

Cornyn							Trump					
Original							Original					
Row Labels	Sum of RCornyn	Sum of DHegar	Sum of LMckennon	Sum of GCollins	Total	% R	Row Labels	Sum of RTRUMP	Sum of DBIDEN	Total	% R	
1	24,868	11,361	775	232	37,236	67%	1	24,831	12,246	37,077	67%	
2	30,186	13,971	819	247	45,223	67%	2	30,193	14,928	45,121	67%	
3	8,187	16,669	519	288	25,663	32%	3	8,338	17,370	25,708	32%	
4	31,076	13,093	890	202	45,261	69%	4	30,549	14,298	44,847	68%	
Grand Total	94,317	55,094	3,003	969	153,383	61%	Grand Total	93,911	58,842	152,753	61%	
Map 1							Map 1					
Row Labels	Sum of RCornyn	Sum of DHegar	Sum of LMckennon	Sum of GCollins	Total	% R	Row Labels	Sum of RTRUMP	Sum of DBIDEN	Total	% R	
1	24,659	11,240	784	223	36,906	67%	1	24,568	12,152	36,720	67%	
2	29,515	13,344	786	237	43,882	67%	2	29,495	14,285	43,780	67%	
3	11,469	18,580	626	331	31,006	37%	3	11,681	19,355	31,036	38%	
4	28,674	11,930	807	178	41,589	69%	4	28,167	13,050	41,217	68%	
Grand Total	94,317	55,094	3,003	969	153,383	61%	Grand Total	93,911	58,842	152,753	61%	
Map 2							Map 2					
Row Labels	Sum of RCornyn	Sum of DHegar	Sum of LMckennon	Sum of GCollins	Total	% R	Row Labels	Sum of RTRUMP	Sum of DBIDEN	Total	% R	
1	22,067	11,213	718	215	34,213	64%	1	22,076	12,020	34,096	65%	obably lower
2	20,805	15,286	688	314	37,093	56%	2	20,873	16,206	37,079	56%	
3	27,612	13,677	901	213	42,403	65%	3	27,213	14,854	42,067	65%	
4	23,833	14,918	696	227	39,674	60%	4	23,749	15,762	39,511	60%	obably higher
Grand Total	94,317	55,094	3,003	969	153,383	61%	Grand Total	93,911	58,842	152,753	61%	

EXHIBIT 18

*September 14, 2021 Email from A.
Kincaid to D. Oldham re Galveston
report*

From: Adam Kincaid <adam@thenrrt.org>
To: "dloesq@aol.com" <dloesq@aol.com>
Subject: Galveston report
Sent: Tue 9/14/2021 5:07:53 PM (UTC)

[TX_GalvestonCountyCommission-DemoShifts-2021.pdf](#)



Adam Kincaid
President & Executive Director
National Republican Redistricting Trust

Web www.theNRRT.org Email adam@theNRRT.org
2308 Mount Vernon Ave. #725
Alexandria, VA 22301



Galveston County Commission

District	Year	Total Population								Voting-Age Population							
		Total	Hispanic	AIAN	Asian	Black	NHPI	White	Two Or More	Total	Hispanic	AIAN	Asian	Black	NHPI	White	Two Or More
1	2010	72,473	15,850 21.9%	286 0.4%	1,974 2.7%	4,640 6.4%	24 0.0%	48,678 67.2%	908 1.3%	54,788	10,167 18.6%	247 0.5%	1,514 2.8%	3,357 6.1%	21 0.0%	38,902 71.0%	509 0.9%
	2020	85,408	22,280 26.1%	302 0.4%	2,568 3.0%	5,834 6.8%	39 0.0%	50,769 59.4%	3,303 3.9%	65,748	14,934 22.7%	248 0.4%	2,109 3.2%	4,323 6.6%	32 0.0%	41,774 63.5%	2,096 3.2%
	+/-	+12,935 17.8%	+6,430 40.6%	+16 5.6%	+594 30.1%	+1,194 25.7%	+15 62.5%	+2,091 4.3%	+2,395 263.6%	+10,960 20.0%	+4,767 46.9%	+1 0.4%	+595 39.3%	+966 28.8%	+11 52.4%	+2,872 7.4%	+1,587 311.4%
2	2010	73,151	13,673 18.7%	289 0.4%	1,876 2.6%	5,103 7.0%	33 0.0%	51,058 69.8%	1,056 1.4%	55,691	9,103 16.3%	222 0.4%	1,428 2.6%	3,592 6.4%	26 0.0%	40,698 73.1%	581 1.0%
	2020	95,596	21,319 22.3%	264 0.3%	3,206 3.4%	7,984 8.4%	71 0.1%	58,916 61.6%	3,463 3.6%	73,739	14,634 19.8%	229 0.3%	2,572 3.5%	5,748 7.8%	50 0.1%	47,895 65.0%	2,365 3.2%
	+/-	+22,445 30.7%	+7,646 55.9%	-25 -8.7%	+1,330 70.9%	+2,881 56.5%	+38 114.0%	+7,858 15.4%	+2,407 228.0%	+18,048 32.4%	+5,531 60.8%	+7 3.1%	+1,144 80.1%	+2,156 60.0%	+24 91.8%	+7,197 17.7%	+1,784 307.0%
3	2010	72,186	23,661 32.8%	278 0.4%	1,114 1.5%	25,574 35.4%	34 0.0%	20,490 28.4%	924 1.3%	53,895	15,741 29.2%	222 0.4%	944 1.8%	18,769 34.8%	29 0.1%	17,615 32.7%	496 0.9%
	2020	79,931	27,129 33.9%	261 0.3%	1,325 1.7%	24,436 30.6%	57 0.1%	24,010 30.0%	2,400 3.0%	61,278	18,741 30.6%	234 0.4%	1,127 1.8%	18,557 30.3%	51 0.1%	20,755 33.9%	1,600 2.6%
	+/-	+7,745 10.7%	+3,468 14.7%	-17 -6.1%	+211 19.0%	-1,138 -4.5%	+23 67.5%	+3,520 17.2%	+1,476 159.7%	+7,383 13.7%	+3,000 19.1%	+12 5.4%	+183 19.4%	-212 -1.1%	+22 75.7%	+3,140 17.8%	+1,104 222.5%
4	2010	73,500	12,086 16.4%	199 0.3%	3,551 4.8%	3,912 5.3%	37 0.1%	52,426 71.3%	1,149 1.6%	52,768	7,638 14.5%	151 0.3%	2,541 4.8%	2,705 5.1%	27 0.1%	39,045 74.0%	571 1.1%
	2020	89,747	17,908 20.0%	209 0.2%	5,103 5.7%	4,866 5.4%	56 0.1%	57,663 64.3%	3,486 3.9%	66,617	11,850 17.8%	157 0.2%	3,899 5.9%	3,661 5.5%	49 0.1%	44,596 66.9%	2,073 3.1%
	+/-	+16,247 22.1%	+5,822 48.2%	+10 5.0%	+1,552 43.7%	+954 24.4%	+19 52.2%	+5,237 10.0%	+2,337 203.4%	+13,849 26.2%	+4,212 55.1%	+6 4.0%	+1,358 53.4%	+956 35.3%	+22 82.2%	+5,551 14.2%	+1,502 262.9%

Unless otherwise noted, all demographic categories are single-race, non-Hispanic | AIAN: American Indian/Alaska Native | NHPI: Native Hawaiian/Other Pacific Islander

EXHIBIT 19

*Excerpts of April 21, 2023 Deposition of William
Cooper*

WILLIAM COOPER

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UNITED STATES DISTRICT COURT
SOUTHER DISTRICT OF TEXAS
GALVESTON DIVISION

TERRY PETTEWAY, et al., : CIVIL ACTION NO.
: 3:22-CV-00057
PLAINTIFFS, : (Consolidated)
:
vs. :
:
GALVESTON COUNTY, TEXAS, :
et al., :
:
DEFENDANTS. :

----- : -----
UNITED STATES OF : CIVIL ACTION NO.
AMERICA, : 3:22-CV-00093
:
PLAINTIFFS, :
:
vs. :
:
GALVESTON COUNTY, TEXAS, :
et al., :
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DEFENDANTS. :

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DICKINSON BAY AREA : CIVIL ACTION NO.
BRANCH NAACP, et al., : 3:22-CV-00117
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PLAINTIFFS, :
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vs. :
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GALVESTON COUNTY, TEXAS, :
et al., :
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DEFENDANTS. :

WILLIAM COOPER

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Friday, April 21, 2023

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Video recorded deposition taken
remotely, via Zoom, of William Cooper,
beginning at 11:14 a.m., before Beau Dillard,
RPR, a Notary Public in and for the
Commonwealth of Pennsylvania and Certified
Registered Professional Reporter.

- - -

VERITEXT NATIONAL COURT REPORTING COMPANY
MID-ATLANTIC REGION

1801 Market Street - Suite 1800
Philadelphia, Pennsylvania 19103

WILLIAM COOPER

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1 reasonable given -- given that in the
2 background, one tries to ensure the components
3 are not fair.

4 And the complex geography and
5 the fact that you have to use a very narrow
6 corridor to get on the Bolivar Peninsula if
7 you're splitting the Bolivar Peninsula two ways
8 instead of -- instead of just one.

9 Q. We just went through split
10 counts in your report. Do you really have a
11 problem with the enacted plan's voter
12 tabulation -- do you really -- do you have a
13 problem with the enacted plan's split counts?

14 A. No. I think both the plans I
15 developed excluding Illustrative Plan 2, have
16 similar numbers of split VTDs. Although, I
17 think -- didn't just look at one, what was
18 that, Illustrative Plan 3. One of them just
19 had one VTD split, populate VTD split.

20 But in general, I don't have a
21 problem with that. It's -- it's -- the problem
22 I have is the blatant, brazen destruction of an
23 existing majority, minority district when it
24 was entirely unnecessary to eliminate it.

25 I mean, I could see how under

WILLIAM COOPER

Page 85

1 certain circumstances with major demographic
2 change, they would have no choice, but here, it
3 was just plain as day obvious that it was not
4 necessary to eliminate that precinct. I do not
5 understand that rational. Maybe you do.

6 Q. Well, let's see.

7 A. Let the record note that he did
8 not respond to that question.

9 Q. Well, let me tell you,
10 Mr. Cooper, this is my examination and I'm
11 examining you today and not the other way
12 around.

13 A. I understand. I'm being half
14 facetious because you really have no answer.

15 Q. Well, we'll find our answers
16 before then.

17 A. I shouldn't be so combative. I
18 apologize. You have to represent the interests
19 of your Defendant.

20 Q. And as an Virginian to
21 Virginian, no need to apologize.

22 A. That's okay.

23 Q. I want to start a new section,
24 Mr. Cooper, but quite frankly I'm starting to
25 get pretty hungry, so do you mind if we take a

WILLIAM COOPER

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1 2020 even for part of 2021.

2 BY MS. KLEIN:

3 Q. I want to ask you one more line
4 of questioning. You talked about with my
5 colleague earlier and that was you were asked
6 about your use of U.S. Census Data in drawing
7 your illustrative plans. I'd just like to
8 clarify that testimony a bit because there
9 wasn't a lot of follow-up on it.

10 When using census data, did you
11 need to subordinate any traditional
12 redistricting criteria in drawing your
13 illustrative plans in order to create a
14 district or districts in your illustrative
15 plans that were majority, minority Black and
16 Latino CVAP?

17 MR. SHEEHY: Objection to form.
18 Objection to form.

19 A. Should I answer?

20 MR. SHEEHY: Yes.

21 MS. KLEIN: Yes.

22 A. No. I did not have to
23 subordinate any traditional redistricting
24 principles. It is incredibly easy to draw
25 majority, minority citizen voting age

WILLIAM COOPER

Page 101

1 population district or precinct in -- in
2 Galveston County and any consultant who would
3 have been working for the County back in 2021
4 or 2022, would have been aware of that.

5 In fact, Illustrative Plan 1 --
6 not illustrative plan, but the County proposed
7 Map 1 and that was just that. So the Board was
8 aware that a district could be created, a
9 precinct could be created that was majority,
10 minority CVAP and failed to adopt it.

11 Q. Did you use anything like racial
12 shading on the screen when you were drawing
13 those illustrative plans?

14 A. No. I don't use -- I don't use
15 shading like that. No.

16 Q. And my last question, does your
17 expert report accurately describe the
18 traditional redistricting criteria you applied
19 in creating each of those illustrative plans?

20 MR. SHEEHY: Objection to form.

21 A. That's -- that's -- that would
22 be my explanation for any Section 2 lawsuit.
23 Normally, I'm trying to demonstrate that a new
24 district can be created where one has never
25 existed. This is unique in that it's a place

WILLIAM COOPER

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C E R T I F I C A T E .

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF PHILADELPHIA:

I, Beau Dillard, RPR, a Notary Public within and for the County and State aforesaid, do hereby certify that the foregoing deposition of WILLIAM COOPER was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.

WITNESS my hand and official seal this 24th day of April, 2023.



Beau Dillard, RPR
Notary Public

WILLIAM COOPER

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INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

WILLIAM COOPER

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E R R A T A
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PAGE LINE CHANGE
__ 20 __ 3 change "shake filees" to "shape files" _ _ _ _ _

Reason for
Change : Transcription error

__ 27 __ 20 change "vetting plan" to "voting plan" _ _ _ _ _

Reason for
Change : Transcription error

__ 28 __ 6 change "additional" to "traditional" _ _ _ _ _

Reason for
Change : Transcription error

__ 28 __ 8 change "voting space" to "voting strength" _ _ _ _ _

Reason for Change :
Transcription error

__ 28 __ 25 change "revision plan" to "redistricting plan" _ _ _ _ _

Reason for Change :
Transcription error

__ 66 __ 1 change "parent" to "pairing" _ _ _ _ _

Reason for Change :
Transcription error

WILLIAM COOPER

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PAGE LINE CHANGE

68 23 change "traditionally -- of principles" to "traditionally one of the principles"

Reason for

Change : Possible transcription error / clarity

72 24 change "made change of the minority, majority" to "maintained the minority-majority"

Reason for

Change : Transcription error

75 9 change "slip bridge" to "foot bridge"

Reason for

Change : Transcription error

75 13-14 change "Generalist 2 or Generalist 3" to "Gingles 2 or Gingles 3"

Reason for Change :

Transcription error

76 1 change "within the form" to "within the norm"

Reason for Change :

Transcription error

82 17 change "Warrington" to "Warenton"

Reason for Change :

Transcription error

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WILLIAM COOPER

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PAGE LINE CHANGE
_ _ 84 _ _ 2-3 change "components are not fair" to "incumbents are not paired"

Reason for
Change : Transcription error

_ _ 88 _ _ 9 change "restated plan" to "least-change plan" _ _ _ _

Reason for
Change : Transcription error

_ _ 89 _ _ 12-13 change "lease change plan" to "least-change plan" _ _ _ _

Reason for
Change : Transcription error

_ _ 94 _ _ 23 change "-- city" to "League City" _ _ _ _ _ _ _ _

Reason for Change :
Transcription error

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WILLIAM COOPER

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ACKNOWLEDGMENT OF DEPONENT

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I, _____, do hereby
certify that I have read the foregoing pages ___
to ___ and that the same is a correct
transcription of the answers given by me to the
questions therein propounded, except for the
corrections or changes in form or substance, if
any, noted in the attached Errata Sheet.

May 16, 2023 William L. Cooper
DATE SIGNATURE

Subscribed and sworn to before
me this 18th day of May,
2023.

My commission expires:

08/31/2025

[Signature]

Notary Public

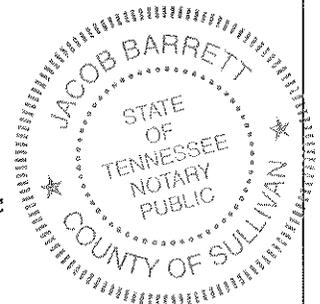


EXHIBIT 20

*October 17, 2021 Email from T. Bryan
to D. Oldham et al. re Galveston*

From: tom@bryangedemo.com
Sent: Sunday, October 17, 2021 5:05 PM CDT
To: Jason Torchinsky; Phil Gordon; Dale Oldham
Subject: Re: Galveston
Attachments: Galveston_Analysis 10_17_21.xlsx, Galveston Min Change Plan.pdf, Galveston Optimal D Plan.pdf, Galveston Original Plan.pdf

Galveston TX, for discussion

On Saturday, October 16, 2021, 07:08:37 PM EDT, Phil Gordon <pgordon@holtzmanvogel.com> wrote:

Talked to Dale. Let's do 11am eastern. Tom, circulate a zoom and I can get it to Dale.
Thanks,
Phil

Sent from my iPhone

On Oct 16, 2021, at 5:46 PM, Jason Torchinsky <jtorchinsky@holtzmanvogel.com> wrote:

Phil and I are tracking him down
Jason Torchinsky
Holtzman Vogel Josefiak Torchinsky PLLC
Sent from my phone. Please excuse any typos.
From: Thomas Bryan <tom@bryangedemo.com>
Sent: Saturday, October 16, 2021 6:45:53 PM
To: Phil Gordon <pgordon@HoltzmanVogel.com>
Cc: Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>
Subject: Re: Galveston

Cool - would you please ask him what time works for him and that we are proposing a 12?

[Sent from Smallbiz Yahoo Mail for iPhone](#)

On Saturday, October 16, 2021, 6:44 PM, Phil Gordon <pgordon@HoltzmanVogel.com> wrote:

Dale Oldham, he's a lawyer. We can discuss in more detail tomorrow.
Phil

Sent from my iPhone

On Oct 16, 2021, at 5:43 PM, Thomas Bryan <tom@bryangedemo.com> wrote:

Can you please share Dale's full name, contact info and role? I'm happy to drive coordinating the meeting. It makes no matter to me 11 or 12, so if you have any interest in being there it is no problem to do 12 instead. I will also defer to Dales schedule.

[Sent from Smallbiz Yahoo Mail for iPhone](#)

On Saturday, October 16, 2021, 6:41 PM, Jason Torchinsky <jtorchinsky@HoltzmanVogel.com> wrote:

Dales availability needs to drive this discussion
Jason Torchinsky
Holtzman Vogel Josefiak Torchinsky PLLC
Sent from my phone. Please excuse any typos.
From: Thomas Bryan <tom@bryangeodemo.com>
Sent: Saturday, October 16, 2021 6:40:03 PM
To: Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Phil Gordon <pgordon@HoltzmanVogel.com>
Subject: Re: Galveston

Would noon serve you better Jason?

[Sent from Smallbiz Yahoo Mail for iPhone](#)

On Saturday, October 16, 2021, 6:37 PM, Jason Torchinsky <jtorchinsky@HoltzmanVogel.com> wrote:

I will be at church. Dale needs to join. He knows what the clients want....
Jason Torchinsky
Holtzman Vogel Josefiak Torchinsky PLLC
Sent from my phone. Please excuse any typos.
From: Thomas Bryan <tom@bryangeodemo.com>
Sent: Saturday, October 16, 2021 6:34:15 PM
To: Phil Gordon <pgordon@HoltzmanVogel.com>
Cc: Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>
Subject: Re: Galveston

You bet I'll take care of it. Maybe 11 eastern?

[Sent from Smallbiz Yahoo Mail for iPhone](#)

On Saturday, October 16, 2021, 6:33 PM, Phil Gordon <pgordon@HoltzmanVogel.com> wrote:

Tom,
I am available to talk tomorrow AM. Someone else might be joining us. Ryer is not involved.
Do you have a zoom link you can circulate?
Phil

Sent from my iPhone

On Oct 16, 2021, at 5:25 PM, Thomas Bryan <tom@bryangedemo.com> wrote:

Phil and Jason,
Would you like a call on Galveston in the morning - maybe 10? I assume Jeff Ryer is in on this too - please confirm I should be looping him in. Teaser - sure looks like I can balance pop with minimal disruptions (no precinct splits) and get 4 strong Rs with a bit more elbow grease (also no precinct splits).

[Sent from Smallbiz Yahoo Mail for iPhone](#)

On Saturday, October 16, 2021, 1:55 AM, Thomas Bryan <tom@bryangedemo.com> wrote:

Jason and Phil,
I just got a draft plan ready with one minimum change scenario and one 4R scenario. Please lmk when you'd like to discuss.
Tb

[Sent from Smallbiz Yahoo Mail for iPhone](#)

EXHIBIT 21

*Excerpts of April 27, 2023 Deposition of Dr. John R.
Alford*

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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.)
GALVESTON COUNTY, et al.,)
Defendants.)

CASE NO. 3:22-cv-00057

ORAL, VIDEOTAPED AND VIDEOCONFERENCED
DEPOSITION OF
JOHN R. ALFORD, PhD
April 27, 2023
VOLUME 1
(Reported remotely in Denton County, Texas)

ORAL, VIDEOTAPED AND VIDEOCONFERENCED DEPOSITION OF
JOHN R. ALFORD, PhD, produced as a witness at the
instance of the Petteway Plaintiffs, was taken in the
above-styled and numbered cause on April 27, 2023, from
9:13 a.m. to 12:08 p.m., before Jamie K. Israelow,
Certified Shorthand Reporter in and for the State of
Texas, Registered Merit Reporter and Certified Realtime
Reporter, reported by machine shorthand, with the
witness appearing remotely in the City of League City,
County of Galveston and State of Texas, and the
provisions stated on the record or attached hereto; that
the deposition shall be read and signed before any
notary public.

1 REMOTE APPEARANCES

2 FOR THE PETTEWAY PLAINTIFFS:

3 Simone Leeper, Esq.
4 CAMPAIGN LEGAL CENTER
5 1101 14th Street NE, Suite 400
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9 -- and --
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aolalde@greerherz.com

5 -- and --
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6 Jordan Raschke Elton, Esq.
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Galveston, TX 77550
8 409.797.3200
jrusso@greerherz.com
9 jraschkeelton@greerherz.com

10 ALSO PRESENT:

11 Brent Kirby, Videographer
12 Sarah Chen, Esq.
Hilary Klein, Esq.
13 Mateo Forero, Esq.
14 Toby Moore

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1 Not surprisingly, there's -- you know,
2 you've got three different experts doing generals that
3 all come up with the same thing. We came up with the
4 same thing, so we're confident that we're -- both in the
5 reasonableness of what the results are producing, right?
6 So we see the raw data. We know what a rough scatter
7 plot looks like. We know what would be an unexpected
8 result. And then we have a benchmark of someone else's
9 analysis who we're confident is using the same
10 technique, and that allows us to benchmark that.

11 Q. Okay. And I think I caught that you said that
12 the -- your running of this code was consistent with the
13 plaintiffs' experts in this case; is that correct?

14 A. Yes, that's correct.

15 Q. Okay. So you didn't have any disagreements
16 with the numerical results of Dr. Barreto and Mr. Rios;
17 is that right?

18 A. That's correct.

19 Q. And --

20 A. I'm sorry, but I just -- I want to make sure
21 I'm clear here. We have had no opportunity to replicate
22 the most recent BISG analysis. I -- it's completely
23 novel. It's complex. We have no R code for it. We
24 have no intermediate data sets for it. We have no
25 output data set. So at this stage, we're -- when -- I

1 can't say that we've replicated or confirmed anything in
2 the BISG analysis and are awaiting the materials that
3 would make that possible.

4 Q. Okay. But you don't have any disagreements
5 with the numerical results of Dr. Barreto and Mr. Rios'
6 original expert report, correct?

7 A. Correct.

8 Q. Okay. And you don't have any disagreements
9 with the numerical results of Dr. Oskooii's report, as
10 well?

11 A. Correct.

12 Q. Okay. So in your report, you propose a 75%
13 cohesion level as the threshold for Gingles cohesion; is
14 that right?

15 A. I -- I explain why it -- it might be a
16 nonarbitrary threshold for cohesion. I'm not advocating
17 that as a -- as a court standard or as a -- a standard
18 for any particular application. I'm just pointing out
19 that -- that if you want to pick a -- if you want a
20 nonarbitrary number, that's the only nonarbitrary point
21 on the cohesion scale from 50 to 100.

22 Q. Okay. So you're not saying that you
23 necessarily need 75% to show cohesion; is that right,
24 then?

25 A. Again, I think it's -- it's a nonarbitrary

1 to go ahead -- could we take just a quick 10-minute
2 break. And, again, I assure you, I'm not going to be
3 doing this every 30 minutes for the next seven hours.
4 It shouldn't be too long today.

5 MS. LEEPER: Does that work for everyone?

6 MS. OLALDE: Sure.

7 MS. LEEPER: Great.

8 THE VIDEOGRAPHER: We are off the record
9 at 9:31.

10 (A recess was taken from
11 9:31 a.m. to 9:49 a.m.)

12 THE VIDEOGRAPHER: This is Segment
13 Number 2. We're back on the record, 9:49 a.m.

14 Q. (By Ms. Leeper) Dr. Alford, do you recall
15 using the terms "racial polarization" and "partisan
16 polarization" in your report?

17 A. Yes.

18 Q. When you talk about "racial polarization"
19 versus "partisan polarization," the differentiation
20 you're making is about the motivation underlying
21 polarized voting, correct?

22 A. I think, ultimately, you can think of that as
23 the motivational, though we're not actually determining
24 people's motivation, right? We don't have data for
25 that. So I -- I think of it as -- in terms of the data

1 we actually have, it's related to the patterns, the
2 regularities that we see in the data.

3 Q. Okay. But -- so what you said, you didn't
4 conduct any of your own analysis to ascertain the
5 motivation of Galveston's voters; is that right?

6 A. Nobody has done -- in this case, has done -- I
7 mean, I'm a defense expert, so much of my work is
8 responsive to the work of -- of plaintiffs, with
9 additions where I think it's useful or doable, and there
10 is no analysis here of the motivations of voters.

11 Q. Okay. And you didn't conduct your own analysis
12 of the motivations of voters?

13 A. No.

14 Q. You didn't conduct any analysis of whether
15 Galveston County's Democrats are voting for their party
16 because of their party affiliation or because of their
17 race?

18 A. We all conducted that analysis.

19 Q. Sorry. I just want to clarify there. That
20 seems to be an analysis of motivation, right, as to
21 whether they're casting their votes because of their
22 race or because of their partisan affiliation, right?

23 A. Right. And we're not doing anything at the
24 individual level to establish which of those might be
25 the case, but we are doing an aggregate-level analysis

1 that -- that provides information about the question
2 about how voters cast votes when they're given signals
3 about both of those things. So we are given a partisan
4 signal on the ballot. Then they have racial or ethnic
5 signals from the candidates themselves. We know then
6 about the patterns that produces then in voting
7 behavior. We don't necessarily know what motivates that
8 pattern, but we do have information about that pattern.

9 Q. Okay. So you're just looking at the pattern of
10 voting itself, not the motivation underlying any pattern
11 of voting?

12 A. That's correct.

13 Q. So on your CV, you list several other times
14 that you've served as an RPV expert witness. In any of
15 those instances, have you found there to be racial
16 polarization and not just partisan polarization?

17 A. Yes.

18 Q. And in which instances were those?

19 A. There would not be any instances in which I was
20 a testifying expert for the defense, because if I'm
21 brought in as a consulting expert and I find that
22 there's racially polarized voting, given that that's my
23 piece of the case, for the most part, these days, the --
24 I explain that to the lawyers. Then we -- then we
25 typically part ways. They -- you know, I leave them

1 THE WITNESS: All right.

2 A. Could you repeat the question?

3 Q. (By Ms. Jayaraman) Sure.

4 I'm not asking about what you discussed
5 during prep. I'm asking if you conducted any analyses
6 concerning this matter that you did not include in your
7 report, not related to your prep session.

8 A. So the only thing that I recall is, again, we
9 would -- we did a --

10 MS. OLALDE: Okay. Sir, I'm going to ask
11 you not to discuss anything that we talked about during
12 preparation.

13 I apologize. Maybe -- would you try your
14 question one more time?

15 MS. JAYARAMAN: Sure.

16 Q. (By Ms. Jayaraman) I'm just wondering if there
17 were any analyses that you conducted prior to writing
18 your report that you did not end up including in your
19 report, not related to any prep sessions at all.

20 A. Okay. So, as I indicated earlier, I'm pretty
21 sure that we would have run a couple of election --
22 general elections through our EI program to be sure that
23 we were getting results comparable to the results from
24 the other experts.

25 My specific recollection is that -- that

1 we did that on -- or compared that to a couple of
2 general election results from Dr. Oskooii's report, so
3 we were confident -- or I was confident in Dr. Oskooii's
4 methodology and the, sort of, clarity with which he had
5 produced both the results in the disclosures. So I
6 think we ran, again, a couple of general elections. We
7 got the results -- results that essentially matched
8 those of Dr. Oskooii, and that satisfied us that we
9 were -- that, technically, we were doing something
10 comparable to what Dr. Oskooii was doing.

11 And we then proceeded to replicate
12 Dr. Oskooii's Democratic primary analysis, as indicated
13 in my report. We replicated it because he didn't
14 provide, either in the report or disclosure, what the
15 estimates were for Anglos, and I wanted to include that
16 in the report. So that analysis -- the analysis of the
17 primaries ended up in the report, but the -- the, sort
18 of, briefer preliminary analysis of a general election
19 was for the purpose of -- of just making sure that we
20 were doing the same thing Dr. Oskooii was doing, and so
21 we could proceed, assuming that we would get results
22 that would be comparable when we moved into areas where
23 we didn't have his results.

24 Again, I'm not -- my report is not
25 challenging anybody's general election results, so the

1 analysis was not comprehensive, wasn't across all the
2 experts, and it wasn't for the purpose of assessing
3 independently what was going on in general elections.
4 It's just a technical procedure we use to ensure that --
5 that we're not comparing apples and oranges when we
6 compare our numbers to someone else's numbers in an
7 internal table, as we did for Dr. Oskooii.

8 Q. Got it.

9 So aside from the analyses that you
10 conducted to make sure that you were comparing apples to
11 apples, were there any other analyses during this matter
12 that you conducted that you did not include in your
13 report?

14 A. I don't recall any other analysis that isn't
15 reflected in the report.

16 Q. And does your report contain a full scope of
17 opinions that you intend to offer in this case?

18 A. As of the time I wrote the report?
19 Everything's in the report that -- at that time, that I
20 had to say about what was in the reports of the other
21 experts. But I recognize that, obviously, reports are
22 continuing to come in, so nothing in my report reflects
23 my feelings about any of the rebuttal reports or
24 whatever Dr. Barreto's most recent BISG is. I'm not
25 sure how you would characterize that. It seems to me to

1 mid-Eastern Seaboard, and then there's also some
2 information from an Australian twin study.

3 Q. Okay. So twins in, sort of, the Atlantic
4 region and some in Australia?

5 A. Yeah. My recollection is -- I could be wrong;
6 it's been a few years -- but that it's actually the
7 Mid-Atlantic Twin Registry that the sample is drawn
8 from.

9 Q. All right. And in the paper, though, you're
10 drawing general insights about the heritability of
11 political attitudes for everybody, not just twins in the
12 Mid-Atlantic Region; is that right?

13 A. That's correct.

14 Q. And is it standard within political science to
15 rely on representative samples to make observations
16 about groups?

17 A. Yes.

18 Q. All right. I'm going to go down to Page 160
19 here. And I'll give you just a moment to look at
20 Table 2, just to sort of refresh your memory about
21 contents.

22 A. Yes.

23 Q. And then going further down, you say: Party
24 affiliation is the most clearly political of the items
25 in the broader questionnaire, and it is useful here on

1 its own, as well as in contrast to the attitudinal
2 items. Party identification is distinct among U.S.
3 political attitudes both in our conception of it as an
4 identification and hence as something at least
5 potentially distinct from simple item evaluation, and in
6 its establish tendency to correlate well between parent
7 and child.

8 Did I read that right?

9 A. Correct.

10 Q. And in looking up here at the table, you
11 distinguish -- this 28-item mean is political issue
12 attitudes, and that's distinguished from party
13 affiliation; is that right?

14 A. That's correct.

15 Q. And so you would agree that there is a relevant
16 distinction between political issue attitudes and
17 partisan identity; is that right?

18 A. That's correct.

19 Q. So, in other words, somebody might not have
20 conservative-issue attitudes, but they still identify
21 with the Republican party; is that right?

22 A. That's correct.

23 Q. And somebody might have conservative attitudes,
24 but they identify with the Democratic party, right?

25 A. That's correct.

1 Q. And I'll go back up to the table.

2 At least speaking based on the results of
3 this study, it's fair to say that political attitudes
4 are not perfectly correlated with party identification;
5 is that correct?

6 A. I think you could assume that, given that they
7 show substantially different heritability, but the study
8 doesn't actually look at the correlation between
9 attitudes and party affiliation.

10 Q. Okay. But I guess -- and we can look here,
11 down at this last sentence of the paragraph: Clearly,
12 party identification is, at least for the United States,
13 a different sort of beast than reactions to issue items.

14 Did I read that right?

15 A. Yes, that's exactly correct. It is somewhat
16 uniquely in the United States, an identification, so
17 it's measured differently in the United States than it's
18 measured, for example, in Europe. You wouldn't ask
19 somebody if they generally consider themselves to be a
20 member of a particular party in Europe, as we do in the
21 U.S. Actually, we don't ask if you're a member of a
22 particular party; we ask: Do you consider yourself to
23 be a Democrat, a Republican, or what?

24 So that is the form of question that is a
25 psychological identification. It's the equivalent -- or

1 A. That was not a yes/no answer.

2 Q. It was not, but that's all right. We'll get
3 back to it.

4 I wanted to ask you a little bit about
5 electoral performance. Have you seen how people
6 sometimes characterize a district as being competitive
7 versus leaning Republican or Democrat or solid
8 Republican or Democrat?

9 A. Yes.

10 Q. Would you characterize a district where the
11 average margin of victory over the last several
12 contested elections is 1% as a competitive district?

13 A. Yes.

14 Q. Would you say that a district where the average
15 margin of victory is 5% over the last several elections
16 is competitive?

17 A. Yes.

18 Q. What about 10%?

19 A. Yes.

20 Q. If the average margin of victory was 40%, do
21 you agree that would not be considered a competitive
22 district?

23 A. Yes.

24 Q. Turning to your report briefly -- I don't think
25 we actually need to pull it up -- but in your report,

1 you do not opine that gender is more correlated with
2 partisan voting behavior in Galveston County than race
3 is, do you?

4 A. I don't think I have any opinion about gender
5 in the report at all.

6 Q. And you don't opine that socioeconomic status
7 is more correlated with partisan voting behavior in
8 Galveston than race; is that right?

9 A. That's correct.

10 Q. And you don't opine that political issue
11 attitudes are more correlated with partisan voting
12 behavior in Galveston than race; is that right?

13 A. That's correct.

14 Q. And, in fact, you don't opine as to whether
15 there's any variable about voters that is more
16 correlated with partisan voting behavior in Galveston
17 than race; is that right?

18 A. I don't think I'm opining about the correlation
19 between race and voting -- or between anything and
20 the -- and the voting pattern.

21 Q. Okay. In your report, you use the terms
22 "partisan polarization" and "racial polarization." And
23 when you're using these terms, the word "polarization"
24 is referring to polarization in the electorate; is that
25 right?

1 Hispanic or Black. Ted Cruz is Hispanic. Mr. West, the
2 former chairman of the Republican party, identifies
3 Black. So for the -- for most of the major offices,
4 those are -- are disclosed personal identifications, as
5 well as ones that can be estimated other ways.

6 THE REPORTER: I'm sorry. Estimated on
7 the --

8 THE WITNESS: Other ways.

9 THE REPORTER: Oh, other ways.

10 THE WITNESS: In other ways.

11 Q. (By Mr. Gonzalez) You're a Texas voter, right?

12 A. I am.

13 Q. And in Texas, you can only vote in one of the
14 party primaries in each election; is that right?

15 A. Legally, that is correct.

16 Q. And when you go to vote, you have to tell the
17 election workers whether you want a Democratic or
18 Republican ballot; is that right?

19 A. That's correct.

20 Q. And you don't provide an opinion or analysis as
21 to what percentage of Anglo voters in Galveston County
22 participate in Democratic primaries; is that right?

23 A. I don't think there's a -- I provide a specific
24 number for that. I think -- I think it's reflected in
25 my report and other reports, it's clear that Anglos --

1 the majority of Anglos that participate in primaries in
2 Galveston County participate in the Republican primary,
3 not the Democratic primary.

4 Q. All right. Earlier, you mentioned discussing
5 with your attorney a topic that was the subject of
6 testimony today. Did you change the way you answered
7 questions in this deposition based on your discussion
8 with your attorney?

9 A. I -- I certainly don't think so. I -- I mean,
10 obviously, the attorneys -- you know, there are things
11 like: Try to be clear --

12 MS. OLALDE: I'm going to ask you not to
13 discuss anything that we talked about, please.

14 Q. (By Mr. Gonzalez) I'd just like to point you
15 to FRCP 30, which says that depositions are conducted as
16 they would be at trial, and you certainly couldn't
17 confer with your client about the subject of the
18 testimony during a trial, right?

19 MS. OLALDE: I have an issue with that.
20 We can take it up with the Court.

21 At this time, I think your question to the
22 witness was a yes-or-no question.

23 A. I'll say I -- I don't believe that any of my
24 responses in this deposition are any different than
25 they've been in the dozens of other depositions that

EXHIBIT 22

*Expert Declaration and Report of Dr.
LaFleur Stephens-Dougan, dated
January 13, 2023*

Report of Dr. LaFleur Stephens-Dougan

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

DICKINSON BAY AREA BRANCH	§	
NAACP, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Civil Action No. 3:22-cv-117- JVB
	§	
GALVESTON COUNTY, TEXAS, et al.,	§	
	§	
<i>Defendants.</i>	§	

TERRY PETTEWAY, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Civil Action No. 3:22-cv-57-JVB
	§	[Lead Consolidated Case]
	§	
GALVESTON COUNTY, TEXAS, et al.	§	
	§	
<i>Defendants.</i>	§	

UNITED STATES OF AMERICA,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Civil Action No. 3:22-cv-93-JVB
	§	
GALVESTON COUNTY, TEXAS, et al.	§	
	§	
<i>Defendants.</i>	§	

EXPERT DECLARATION AND REPORT OF DR. LAFLEUR STEPHENS-DOUGAN

January 13, 2023

Report of Dr. LaFleur Stephens-Dougan

Executive Summary

1. I am an Associate Professor of Politics and the Associate Director of Graduate Studies in the Politics Department at Princeton University. Counsel for Plaintiffs, the Dickinson Bay Area Branch NAACP, Galveston Branch NAACP, Mainland Branch NAACP, Galveston LULAC Council 151, Edna Courville, Joe A. Compian, and Leon Phillips (collectively, “Plaintiffs”) retained me in this matter to provide an overview of the academic research regarding the intersection of race, racial attitudes, and partisanship. I was also retained to opine on the interplay between racial attitudes and political behavior in America, with a particular look at the American South and Galveston County, Texas.
2. I begin by tracing the historical realignment of partisan voting behavior in the American South based on race, beginning with the civil rights movement of the 1960s and continuing into the Twenty-First Century. I also look at how the role of race in politics shifted as expressing explicit, biological racism became socially less acceptable in the latter part of the 20th Century.
3. Next, I review the contemporary research regarding a phenomenon referred to as “racial priming.” Racial priming is when politicians highlight issues associated with racial and ethnic minorities, such as crime or welfare (Gilens 1999; Gilliam & Iyengar 2000; Mendelberg 2001, 2008; Valentino 1999; Hutchings and Jardina 2009), instead of employing direct references to racial and ethnic minorities. Subsequently, negative racial attitudes about those racial and ethnic minorities are activated or “primed” such that those attitudes become a salient factor in Americans’ political evaluations. Partisan politicians are aware, and have been for many years, of the central role that race plays in social group formation, and hence in political behavior; thus, they have developed strategies to appeal to certain constituencies based on the underlying racial attitudes of those constituencies. These strategies not only play off of pre-existing racial attitudes in society, but they in turn further entrench those attitudes and polarize voters along a simultaneous racial and partisan divide.
4. Lastly, I consider sources of information on salient political and racial issues in Galveston County, Texas to determine whether the jurisdiction fits the well-accepted academic model of racial and partisan alignment described in the preceding sections.
5. Based on the analysis I conducted for this Report and the knowledge gained throughout my academic career focusing on these issues, I can conclude that race and politics are deeply intertwined in most of the American South and that Galveston County fits squarely within that paradigm. In a jurisdiction such as Galveston County, the political polarization between white voters and voters of color is not just an arbitrary statistical fluke, rather it is a reflection of the fact that partisanship and political behavior in such jurisdictions are themselves largely the outgrowth of a long history of racial division and racial attitudes.
6. I know of the facts set forth in this declaration of my own personal knowledge and research, and could and would competently testify to those facts if asked to do so.
7. All of the data and facts relied upon in forming my opinion, as well as assumptions I made in forming my opinions, are included in this Report and its Exhibits.

Report of Dr. LaFleur Stephens-Dougan

8. I reserve the right to amend and to supplement the opinions expressed in this Report in light of additional facts, testimony, and or/materials brought to my attention concerning this matter.

Background and Qualifications

9. I am an Associate Professor of Politics and the Associate Director of Graduate Studies in the Politics Department at Princeton University, where I worked as a postdoctoral research associate for one year before becoming a faculty member in 2014. Prior to that, in 2013, I completed my predoctoral fellowship in the Department of Political Science at the Massachusetts Institute of Technology. From September 2017 to May 2018, I was a Sheila Biddle Ford Foundation Fellow at Harvard University's Hutchins Center for African and African American Research. My current Curriculum Vitae is appended to this declaration as Exhibit A.
10. My areas of expertise include racial attitudes; public opinion; Black politics; race, ethnicity, and politics; political communication; and experimental methods.
11. I have taught undergraduate courses on Race and Politics in the United States; Race and Politics in the Age of Obama; Black Politics in the Post-Civil Rights Era; and a Junior Paper Workshop on Race and Ethnic Politics. I have also taught a graduate course titled Introduction to American Politics: Political Behavior.
12. In 2013, I received my Ph.D. in Political Science and Public Policy from the University of Michigan in Ann Arbor, Michigan. In 2002, I received my Bachelor of Arts in Political Science with departmental honors at the University of Rochester in Rochester, NY.
13. In 2014, the Race and Ethnic Politics section of the American Political Science Association awarded me the Best Dissertation Award.
14. My research focuses on the role of race in electoral politics: racial attitudes, Black politics, and public opinion.
15. I have published, and plan to publish, several peer-reviewed articles in academic journals, including the *Journal of Politics*, the *American Political Science Review*, *Electoral Studies*, the *Annual Review of Political Science*, and the *Journal of Race, Ethnicity, and Politics*. These articles focus on race and electoral politics, Black politics, and inequality. A full list of my peer-reviewed publications is contained in my C.V., which is appended to this declaration as Exhibit A.
16. In 2019, I also published an analysis in the Washington Post titled "Joe Biden's 'civility' comment told biased whites that he won't upset the racial order."
17. In 2020, I authored a book of particular relevance to this Report titled *Race to the Bottom: How Racial Appeals Work in American Politics*. Relying on a series of survey experiments and cases of politicians, I argued that political candidates across the racial and political spectrum appeal to negative racial stereotypes for political advantage. My research shows

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that this incentive to engage in racialized communications undermines racial progress and harms nonwhite communities.

18. I am being compensated at a rate of \$300 per hour for work in this matter. My compensation is not in any way contingent on the content of my opinions or the outcome of this matter.

A Note About Methodology

A number of survey items over the years have been used to measure racial attitudes, some of which I will discuss in this section. It is worth taking the time to explain how racial attitudes are measured and what the different metrics capture, because these racial attitudes are referenced throughout the Report.

Racial Resentment

As explained in the body of this Report, overt biological racism – that is, openly opining about the biological superiority or inferiority of a race – became socially less acceptable in the last half of the Twentieth Century. Racial attitudes became more values-aligned. Kinder and Sanders (1996) effectively standardized the measurement of modern racism with their racial resentment scale. The scale is routinely captured in political surveys, including the American National Election Studies (ANES), which has been asking the racial resentment battery for the last 30 years.

The questions are presented as assertions, and respondents are asked to indicate whether they agree or disagree with the statement, and how strongly they agree or disagree. The assertions are as follows:

- Irish, Italian, Jewish and many other minorities overcame prejudice and worked their way up. Blacks should do the same without any special favors.
- Generations of slavery and discrimination have created conditions that make it difficult for Blacks to work their way out of the lower class.
- Over the past few years, Blacks have gotten less than they deserve.
- It's really a matter of some people not trying hard enough; if Blacks would only try harder, they could be just as well off as whites.

The racial resentment scale is constructed from these statements by coding the five potential responses to each assertion from 0 to 1 in intervals of .25, with 0 being the most racially liberal response and 1 being the most racially conservative. Answers are then summed and divided by the number of items to provide an easily interpretable 0 to 1 scale.

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The scale was designed to distinguish between racially sympathetic Americans who attribute racial inequity to structural causes and racially resentful Americans who attribute racial inequality to purported cultural deficiencies among African Americans.¹

By this standard, a score of .50 marks the neutral point. Individuals scoring below .50 are classified as “racial liberals,” whereas those individuals with scores above the midpoint are more racially resentful. According to this standard, the United States is a racially conservative country. The average racial-resentment score for whites is consistently around .65 on this 0 to 1 measure. However, in 2020 (the last time the survey was fielded) the average racial-resentment score for whites was .48, which may have been an anomaly because of the widespread racial justice protests of 2020. More relevant to this Report, however, are the mean and median racial resentment scores for whites living in the American South (whom I will refer to as Southern whites). In 2020 the mean racial resentment score for Southern whites was .55, which means that on average Southern whites are racially resentful. Moreover, the median racial resentment score for Southern whites was .56, which means that 50 percent of Southern whites had racial resentment scores higher than .56, squarely placing them on the racially resentful side of the spectrum.

Negative Racial Stereotypes

Because there has been considerable debate about how to measure racial prejudice in contemporary America, another metric that is commonly used measures racial stereotypes. This measure asks respondents to rate how hardworking, intelligent, and non-violent racial and ethnic groups are on seven-point scales, ranging from 1 (lazy/unintelligent/violent) to 7 (hardworking/intelligent/non-violent). Subsequently, the scores respondents give a racial or ethnic minority group are subtracted from the scores respondents give white people to calculate how a given respondent rates the racial or ethnic minority group *relative* to white people. Endorsing the stereotype that people of color are lazier, less intelligent, or more violent than white people is an unambiguous measure of prejudice because respondents are expressing a preconceived notion about an entire group of people based on their racial or ethnic group.

A non-trivial fraction of whites consistently rates their own group as more hardworking and intelligent than African Americans. In the most recent American National Election Study (2020), 38 percent of white Southerners rated African Americans as less hardworking than whites. In the same survey 25 percent of Southern whites rate Latinos as more violent than whites. If anything, these statistics might underestimate the extent of prejudice because of social desirability bias, or the tendency to underreport socially undesirable attitudes.

Survey Experiments

¹ While the racial resentment scale was created with African Americans in mind, it is worth noting that evidence indicates the racial resentment scale is associated with generalized outgroup prejudice and correlated with anti-Latino attitudes (Kalkan et al. 2009; Kinder and Kam 2010). Research also indicates that racial resentment is highly correlated with immigrant resentment, immigration policy attitudes, and sentiment towards immigrants and Latinos (Reny et al. 2020).

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Much of the research cited throughout the Report relies on survey experiments. A survey experiment is an experiment conducted within a survey. These surveys are typically conducted online. In an experiment, a researcher randomly assigns participants to at least two experimental conditions. The researcher then treats each condition differently. Due to random assignment, the researcher can assume that the only difference between conditions is the difference in treatment. For example, a survey experiment may learn about the effect of a campaign advertisement by creating two experimental conditions and exposing participants in only one condition to the campaign advertisement (the treatment). This is the gold standard of research because experiments can establish causality.

Random assignment ensures that the version of the “treatment” (message or cue) is not based on respondents’ previous answers or any other personal characteristics. This way, we can generally be confident that any differences in answers across groups of respondents are not based on each group’s particular attributes. Since the only thing that differs between the two groups is the treatment, we can be confident that the “treatment” is responsible for the difference in opinion.

Section 1: The Relationship Between Race and Partisanship in the U.S. South*Introduction*

Race has been a dominant element in Southern politics from the beginning of this nation’s history, leading to significant sectional conflicts at several pivotal moments, including the writing of the Declaration of Independence and the Constitution, the events triggering the Civil War, and the abandonment of Jim Crow (Valentino and Sears 2005). In each of these instances, the white South’s formal system of racial inequality confronted substantial, though hardly unanimous, opposition elsewhere in the country. Thus, from very early on, regional differences in the United States regarding race and racial attitudes were evident. In fact, V.O. Key, in his seminal work *Southern Politics in State and Nation* (1949) went as far as to say, “In its grand outlines the politics of the South revolves around the position of the Negro” (5). In other words, he contended that race had been and continued to be the fundamental structuring force of Southern politics. Although decades old, Key’s observations continue to be relevant today.

Today in the South, as well as nationally, the two major parties are split quite decisively along racial lines. Republicans are almost all white and African Americans are the dominant core of the Southern Democratic party (Black and Black 2002; White and Laird 2020). In the South, 9 of 10 Black people often vote Democratic, while most whites support Republicans. And in the case of Latinos, although, their support for the Democratic party is weaker than that of African Americans, Latinos in the South routinely support the Democratic party at or above twice the rate they support the Republican party. The expert Report of Dr. Kassra Oskoi in this Matter, which uses accepted political science methods for assessing voting patterns and was provided to me by Plaintiffs’ counsel, indicates that, in general, over 80 percent of African Americans and Latinos in Galveston County vote for Democratic candidates while over 80 percent of white voters support Republicans in the County. Race and party are deeply intertwined.

Take, for example, the 116th Congress. In the 116th Congress, Republicans held 85 percent of the congressional seats in the South in districts that were 20 percent to 29 percent Black, compared

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to 62.5 percent of congressional seats in Southern districts that were 30-39 percent Black (Bullock and Rozell 2021). Democrats represent all of the districts in the South that are at least 40 percent Black (Bullock and Rozell 2021). Furthermore, in the South, the districts with small concentrations of African Americans not held by Republicans were at least two-thirds Latino.² These statistics suggest that the lower the concentration of Blacks and Latinos in a district, the less likely it becomes that those districts will elect a Democratic politician. In short, differences in partisanship and partisan voting behavior are deeply related to racial group membership in the South, thus giving each party advantages in distinctive types of constituencies. A partisan advantage in the South is in effect a racial advantage, and, for reasons explained in this Report, the two concepts cannot simply be disentangled and considered as separate, independent phenomena when considering politics in a jurisdiction such as Galveston County, Texas.

Why are Race and Partisanship in the South so Closely Intertwined?

A longstanding finding in political science is that most Americans do not think of politics in coherent, ideological ways (Converse, 1964; Kinder & Kalmoe, 2017). Rather than a politics informed by ideology, research indicates that people tend to think about parties in terms of groups (Campbell et al., 1960; Converse, 2006; Green et al., 2002; Lazarsfeld et al., 1954). As explained by Green, Palmquist, and Schickler (2002), individuals first identify with primary social groups such as race, class, and religion. Subsequently, these attachments lead individuals to associate with the party they see as closest to those groups, and which actively distances itself from outgroups they dislike. People's feelings toward the groups that constitute the parties drive their feelings toward the parties, and ultimately their partisanship (Green et al. 2002; Hetherington and Weiler 2009; Kane, Mason and Wronski 2021).

Green et al. (2002) describe the process by which people come to identify with a party as starting with the question: “What kinds of social groups come to mind as I think about Democrats, Republicans, and Independents? Which assemblage of groups (if any) best describes me?” (p. 8), instead of: “Which party best represents my political positions?” In short, social identities are at the heart of party identification, more so than the parties' positions on the issues, their performance in office, or their ideology. The prominent role of social identities in partisan identification means that party identification is both a political and, arguably, racial concept because race has historically been the most salient divide in American politics (Mangum 2013; Westwood and Peterson 2020; Zhirkov and Valentino 2022). A reference to partisanship in the South is also a reference to race.

Racial Realignment

Significant, long-term change in the voting behavior and party identification of the electorate is what scholars refer to as a “realignment.” By their very nature, realignments are rare events. The scholarly consensus is that the last realignment in the United States occurred in the American South during the latter half of the 20th century.

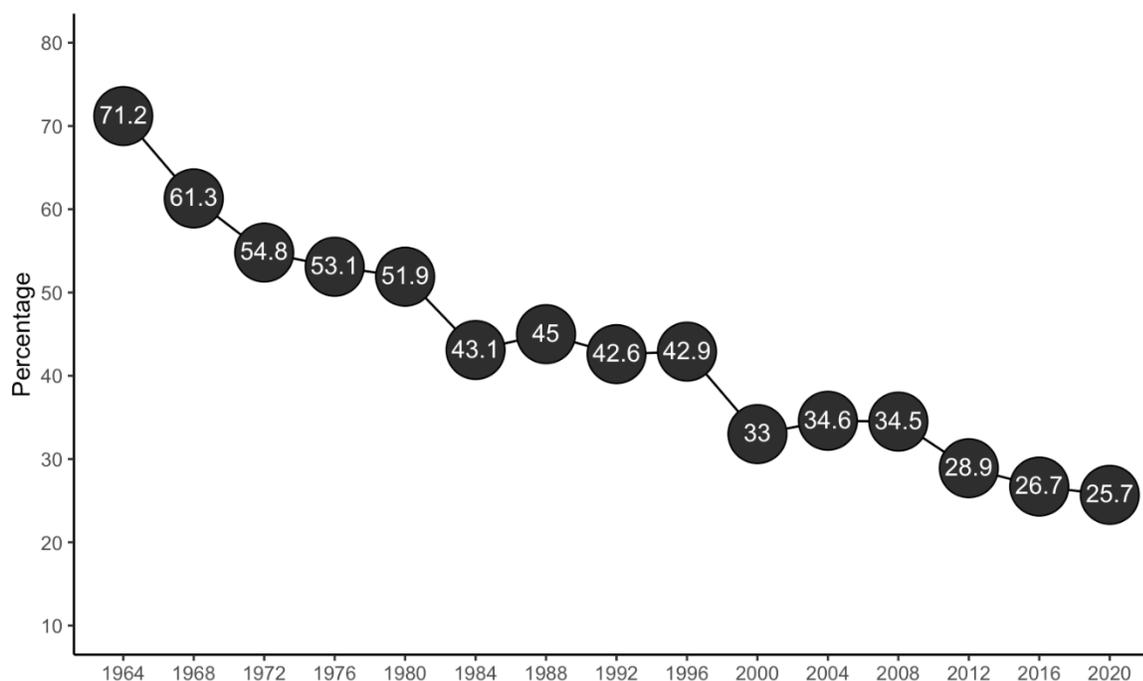
From the end of Reconstruction to the middle of the 20th century, Democratic candidates in the “Solid South” reliably won elections, with white Southerners overwhelmingly supporting the

² Except for Florida-7 and Virginia-10.

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Democratic party. However, a major shift occurred during the latter half of the 20th century, among white Southerners from the Democratic party to the Republican party. This shift, or realignment, was driven by the battle over civil rights, which transformed the American South from the “Solid South,” to a two-party system. As illustrated by Figure 1, Democratic party identification among whites in the South has dramatically declined since 1964.

Figure 1: Percent Party Identification as Democrat, Among Whites Who Live in the South, 1964 – 2020 (weighted) [Created from ANES]



Source: American National Election Study Time Series Cumulative Data File (1948 – 2016) available at <https://electionstudies.org>.

The Democratic hold on the South weakened considerably in the 1960s at the federal level and was nearly complete at the local level by the early 1990s (Bullock et al. 2005; Black and Black 1992; Black and Black 2002). In the 2000 presidential election, which was one of the most narrowly divided elections in history, the regional shift was complete, when Al Gore lost every Southern state including his own.

Many older whites who may have initially voted for the Democratic party, and who came from families where it was common to support Democrats, changed parties beginning in the 1960s (Beck 1977). This change to voting Republican was most pronounced in presidential elections, as many of these former Democrats continued to vote for Democrats at the local level, well into the 1980s. Conversely, most young, white, native-born Southerners in the post-civil rights era start out as Republicans because they have been politically socialized by parents and grandparents who despite being former Democrats, were solidly in the Republican camp by the

time the post-civil rights generation came of age.³ In short, the growth of the Republican party in the South during the latter half of the 20th century can largely be attributed to white Americans who changed from the Democratic party to the Republican party.

What Caused Racial Realignment in the South?

Realignments generally depend on two factors. First is a change among party elites (i.e., elected officials and party leadership). The second factor is the mass public's attitudes (Valentino and Sears 2005).⁴ The first factor—the change among party elites— can be traced to the end of Eisenhower's term. In the congressional elections of 1958, liberal Democrats defeated several prominent liberal Republicans, and the reputation of both national parties began to change considerably (Carmines & Stimson, 1989) (Layman and Carsey 2002). For example, by 1960, one-third of Mississippi voters cast their ballots for “unpledged electors” when the choice stood between a Republican and the pro-civil rights Kennedy (Maxwell and Shields 2019). The implication of this is that these longstanding supporters of the Democratic party did not feel comfortable voting for the relatively pro-civil rights Kennedy, but they were not yet comfortable supporting the Republican party. However, this reluctance to support the Republican party among white, Southern Democrats would soon change. This change in support for the Republican party among the mass public is the second factor that contributed to racial realignment in the South.

Analyzing mass public opinion data from the American National Election Study, renowned political scientist Philip Converse wrote in 1963 that in the South, the race issue came closest to having “those characteristics necessary if a political issue is to form the springboard for a large-scale political realignment” (Davidson 1990, p. 226). Up to that point, however, as Converse observed, “The Republicans have [not] come forth to champion the Southern white. Instead, their gestures toward the Southern Negro have come close to matching those of the Northern Democrats. If we doubt that partisan realignment is to occur, it is to say that we expect no dramatic change in this state of affairs” (Davidson 1990, p. 226). In other words, if partisan realignment was to occur, Converse said that it would occur because of Republican efforts to court the Southern white vote using the race issue. Converse's comments were extremely prescient.

By the 1964 presidential election, there was a dramatic change in the state of affairs, in which white Southerners no longer felt reluctant to support the Republican party. Many white Southerners felt comfortable supporting the GOP, with Barry Goldwater as the GOP nominee. Despite a moderately progressive record on Black equality, Goldwater largely based his presidential campaign on opposition to the Civil Rights Act of 1964, enacted in July 1964. Goldwater reportedly said, “We’re not going to get the Negro vote as a bloc in 1964 or 1968, so

³ Republican migration to the South has contributed to the shift toward the Republican party, but it is not a dominant factor (Black and Black 1992; Carmines and Stanley 1990; Miller and Shanks 1996; Petrocik 1987; Stanley 1988).

⁴ For an exception, see Schickler 2016. Schickler (2016) argues that top party leaders were actually among the last to move, and that their choices were dictated by changes that had already occurred among the mass public. Regardless of whether realignment was driven by party leadership or by the mass public, there is a near universal consensus that the realignment of the last half of the 20th century was driven by racial attitudes and racial issues.

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we ought to go hunting where the ducks are” (Johnson 1968).⁵ In other words, Goldwater was suggesting that the Republican party should abandon efforts to court Black voters in the North, instead focus on white Southerners. To do so, the Goldwater campaign appealed to racism against African Americans. This strategy was referred to as “Operation Dixie” and it highlighted the party’s opposition to civil rights as a means of courting the white Southern vote. Operation Dixie was the first iteration of what later became known as the “Southern Strategy” (Maxwell and Shields 2019).

Ultimately, Goldwater only carried five deep Southern states in the 1964 election (and his home state of Arizona). His victory in the few states that he won was largely driven by segregationists rallying to the Republican party, in what was otherwise an overwhelming defeat for Goldwater. Most notably, Dixiecrat, Senator Strom Thurmond (SC) left the Democratic party to join the Republican party and campaign on behalf of Goldwater (Maxwell and Shields 2019). Notably, Goldwater’s greatest margins of victory came from the counties with the highest population of African American residents (Phillips 1969), which suggests that the whites who were most threatened by the potential of Black enfranchisement, were the most fervent supporters of the Republican party and less likely to support those candidates who sought to increase Black enfranchisement through civil rights legislation. In short, Goldwater was most successful in the deep South, which was uniquely racially polarized, as the term, “Southern Strategy” aptly indicates.

Despite the fact that Goldwater was soundly defeated in the 1964 presidential election, the Goldwater/Thurmond moment was transformative in how white Southerners understood the two parties on civil rights. Prior to 1964, the Democrats were largely seen as the party of economic liberalism, and the GOP, the party of economic conservatism. As late as 1962, polls asking which political party was “more likely to see to it that Negroes get fair treatment in jobs and housing” showed that Americans saw virtually no difference between Democrats and Republicans (Edsall and Edsall 1992). By 1964, when asked the same question, however, 60 percent of Americans said Democrats were more in favor of fair housing and jobs for African Americans, while just seven percent said Republicans. In a similar vein, when asked which party was more likely to support integration in 1964, 56 percent of Americans said Democrats, whereas only seven percent said Republicans (Edsall and Edsall 1992).

The perception of the Democratic party as more in favor of integration and fair housing and jobs for African Americans can largely be attributed to Presidents Kennedy (1961-63) and Johnson (1963-69). Kennedy and Johnson placed the Democratic Party firmly on the side of the civil rights movement and against segregation, resulting in the Civil Rights Act of 1964 and the Voting Rights Act of 1965, both of which President Johnson signed into law. Thus, Kennedy and Johnson stood in sharp contrast to Goldwater, whose opposition to the 1964 Civil Rights Act was a cornerstone of his campaign. This series of events led the two parties to become distinguishable on matters of race, which contributes to the racial polarization of the two major parties that we see today. In fact, since the passage of the Civil Rights Act, no Democratic presidential candidate has won the majority of the white vote nationally (Frey 2020). Moreover,

⁵ African Americans who were recently enfranchised started voting in large numbers for Democrats after the passage of the New Deal and also as a result of machine style politics in the North. The national Democratic party’s relatively pro-civil rights stance helped to solidify this allegiance.

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since the Civil Rights Act became law, the only Democratic presidential candidate to have won the South (and Texas) is “son of the South,” President Jimmy Carter (Montgomery 2020). Carter may have been a more palatable Democratic politician to many Southern whites because he was a Southerner, and thus, not as closely aligned with the racial liberalism of the national Democratic party.

As noted earlier, however, Republican gains in the South were initially limited to presidential elections. For much of the 1970s and 1980s, white Southerners voted heavily for Republican presidential candidates, but sent large numbers of Democrats to Congress and state legislatures. However, the Republican party was slowly able to make inroads with Southern whites at the local level, largely through the use of the Southern Strategy. In fact, liberal national Republicans, as early as 1961, warned that such a strategy, “built on the backs of the Negro” would lead to a “lily-white” GOP (Reinhard 1983). And that is precisely what happened.

Southern Strategy in Texas and Beyond

In Texas, one issue that was successfully used to court the white vote as a part of the Southern Strategy was school desegregation. After the U.S. Supreme Court’s 1954 decision in *Brown v. Board of Education*, opposition to school desegregation quickly became a cause within the state Republican party. For example, as early as 1958, the State Republican Party platform came out strongly against federal enforcement of desegregation laws. The 1958 platform indicated that “the gradual solution for problems relating to desegregation in Texas be left to the people, the school boards, and the courts, within this state” (Davidson 1990, p. 224). This support of “states’ rights” was tantamount to continuing segregation indefinitely, given the popular mood at the time.

By 1960, school desegregation, and the civil rights movement more broadly, had created a serious rift in the national Republican party. The liberal wing of the party, led by New York Governor Nelson Rockefeller, was instrumental in getting presidential candidate Richard Nixon to agree to a major revision of the civil rights plank of the platform, with stronger language in support of civil rights. For example, the revised language included a commitment to “aggressive action to remove remaining vestiges of segregation or discrimination in all areas of national life” (Davidson 1990, p. 225).

In response, Texans on the right threatened to bolt to Goldwater and lead a floor fight against the platform at the national convention. This threat to align with Goldwater resulted in the removal of any language from the platform indicating “aggressive action” in support of civil rights. In fact, John Tower, who would go on to represent Texas in the United State Senate, was credited with keeping the platform committee from writing all of Rockefeller’s civil rights proposals into the platform. This behavior earned Tower a standing ovation from the Texas delegation to the convention (Davidson 1990). Tower was also able to use his opposition to desegregation to bolster his popularity within the state party in other ways. For example, Tower sponsored a proposed constitutional amendment barring “forced busing,” successfully using the issue in his 1972 senatorial campaign to defeat his Democratic opponent (Davidson 1990).

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Busing was successfully used to mobilize voters on the right in Texas. As late as 1976, the state Republican party added a referendum on “forced busing” to its primary, which was opposed by 90 percent of voters (Davidson 1990). Conversely, the state Democratic party refused to put the issue on their primary ballot, which only further contributed to the racial polarization of the two parties at the state level.

Thus, by the 1980s the state parties were largely sorted on race, with the Republican conventions being overwhelmingly white. For example, just one percent of the Texas delegates to the 1984 national Republican convention were Black and 9 percent were Latino, compared to 24 and 20 percent, respectively of Democratic delegates (Davidson 1990). A study of the Texas Republican gubernatorial primary electorate in 1978 revealed that African Americans and Mexican Americans made up less than one percent of the voters. Ten years later, African Americans constituted one percent of the Republican presidential primary electorate and slightly more than one half of one percent of the state Republican convention. Conversely, the minority proportion of the Democratic primary electorate in the 1980s may sometimes have exceeded 35 percent (Davidson 1990).

Similar racial patterns emerged among elected officials. By the mid-1980s, the overwhelming majority of Black and Latino officeholders at lower levels in Texas were Democrats. In the state legislature, for example, none of the 58 Republicans in 1985 was Chicano, and only one was African American. Among the 123 Democrats, 22 were Chicano and 13 were Black, for a total of 28 percent of the party's legislative strength. In the Texas delegation to the U.S. House of Representatives elected in 1986, none of the 10 Republicans belonged to a minority group; of the 17 Democrats, four were Latino and one was Black, for a total of 29 percent (Davidson 1990).

The racial patterns that emerged in Texas among the two major parties were mirrored throughout the South, and nationally as well. By 1994, white support for Republican candidates throughout the South surged to record levels, enabling the GOP to achieve majority status in the region's U.S. Senate and House delegations and make substantial gains in Southern state legislatures as well (Black and Black 2002).

Republican dominance in the South continues today. Of the 11 states of the former Confederacy, only two are currently represented by Democratic governors (Louisiana and North Carolina), while in the U.S. Senate, Georgia and Virginia are the only Southern states to be represented by Democrats.⁶ In Texas, a Democrat has not won a statewide election since 1994 (Montgomery 2020). The scholarly consensus is that the Democratic party's association with African American voters and racial liberalism (Carmines & Stimson, 1989) has cost them the support of white Southerners.

Racial Backlash to the Voting Rights Act

To date, much of the scholarship about the effects of the Voting Rights Act (VRA) has focused on the positive outcomes of the VRA, specifically the expansion of the franchise for African Americans. The scholarship has also paid close attention to how the VRA enabled racial and ethnic minorities to elect political representatives of their choice. For example, when the Act

⁶ Author's calculations

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was passed in 1965, there were only five African Americans in the U.S. House and Senate combined. Today there are 60 African Americans. In a similar vein, until 1980, Latinos seldom held more than five seats at the federal level. That figure has since increased more than tenfold. In the 118th Congress, there are 54 Latinos.⁷

Yet, despite the gains associated with the VRA, the response to the VRA has not been entirely positive. The evidence indicates for example, that there has been a racial backlash to the VRA, whereby jurisdictions that were covered by Section 5 incarcerated African Americans at a higher rate than those jurisdictions that were not covered by Section 5. Specifically, Eubank and Fresh (2022) compiled archival statistical reports and prison intake data to create a new dataset on admissions to state prisons by race in the decades before and after the 1965 Voting Rights Act (~1940-1985). Subsequently, they used those data in a series of difference-in-differences designs leveraging variation in state and local coverage by Section 5 of the VRA.⁸

The results of Eubank and Fresh (2022) indicate that Black prison admissions rates as well as the difference between Black and white admissions rates increased *more* after 1965 relative to those jurisdictions that remained uncovered. Specifically, Black prison admissions rates in covered states increased by more than one-third of the average incarceration rate in non-covered states. Moreover, the difference between Black and white admissions rates in covered states increased by more than 50 percent of the average incarceration rate difference in uncovered states. Also of note, is that the increase in Black prison admission rates, as well as the increase in the difference between Black and white prison admission rates, was not driven by a demand for more incarceration among the newly enfranchised Black population. If anything, counties with more Black elected officials had less of an increase in racially differentiated incarceration rates relative to counties with fewer Black elected officials.⁹ Black incarceration rates were also lower in counties with Black elected officials relative to counties that did not have any Black elected officials (Eubank and Fresh 2022).

Thus, Eubank and Fresh (2022) provide important empirical evidence of a racialized response to the enfranchisement of people of color after the passage of the VRA. These results indicate that racialized backlash to the VRA is not limited to the *electoral* context. In other words, while a long line of research argues that electoral policies, such as racial gerrymandering, switching from district to multimember election systems, changing public offices from elective to appointive, or increasing the qualifications for candidacy were adopted as a racial backlash to the VRA (Parker

⁷ Author's calculations

⁸ Section 5 required "preclearance," whereby jurisdictions with a history of discrimination had to submit changes to their voting and election rules to federal officials for approval. While the Voting Rights Act applied everywhere, only some jurisdictions were subject to preclearance, which means that they were effectively "treated" with greater scrutiny than jurisdictions not covered by Section 5 of the Voting Rights Act. During the 1975 renewal of the VRA, Congress also expanded preclearance to jurisdictions with large language minority groups that had English-only voting materials and low registration or turnout.

⁹ The analysis assessing the effect of Black elected officials at the county level relies on data from Alabama, Georgia, and Tennessee because county-level data by race and by year was not available for all states. However, these states are "typical" cases (Seawright and Gerring 2008).

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1990), Eubank and Fresh (2022) indicate that the racial backlash to the VRA went far beyond electoral policies to include issues such as the mass incarceration of Black people.

Electoral Environment Post-Shelby County v. Holder

In 2013, the Supreme Court in a 5-4 decision ruled that the VRA formula used to determine which states and localities were subject to preclearance was outdated and was therefore unconstitutional. Thus, preclearance was made unenforceable. The aftermath of the ruling has seen Republican lawmakers nationwide passing legislation that places more conditions on voting (e.g. strict voter ID requirements, limiting absentee voting, etc).

A 2022 study from the nonpartisan Brennan Center for Justice found that racially diverse states governed by Republicans are more likely to implement restrictive voting policies. However, states with overwhelmingly white populations are unlikely to restrict voting policies, regardless of which party controls the legislature. “The recent trend of restrictive voting laws lies at the intersection of race and partisanship,” the report states. “We are not seeing these bills introduced and passed everywhere that Republicans have control. Rather, they are most prevalent in states where they have control and where there are significant non-white populations” (Morris 2022).

In order to assess the impact of race on voting laws, the researchers calculated the racial composition of both the districts represented by sponsors of voting restriction bills as well as their home states. They also calculated the racial resentment scores of the respective legislative districts, using data from the 2020 Cooperative Election Study. The results of the analysis indicate that lawmakers from the whitest districts in the most racially diverse states were the most likely to sponsor restrictive voting legislation. It also found that districts with high levels of racial resentment were more likely to be represented by lawmakers who support measures to restrict voting. Specifically, districts with the highest racial resentment scores were 50 percent more likely to have a lawmaker who sponsored restrictive voting legislation relative to districts with the lowest racial resentment scores. These results held true even after controlling for other factors that might be related to the sponsorship of voting legislation, including the median age of the district, Trump vote share in the district (a measure of partisanship), and education levels in the district (Morris 2022). According to the report, the results are “consistent with the theory that ‘racial backlash’—a theory describing how white Americans respond to a perceived erosion of power and status by undermining the political opportunities of minorities—is driving this surge of restrictive legislation” (Morris 2022).

In short, in the post-*Shelby v. Holder* era, more restrictive voting legislation has been sponsored and passed. The sponsorship of this legislation is strongly correlated with racial attitudes, even after accounting for partisanship.

Section 2: The Relationship Between Racial Attitudes and Partisan Affiliation

Racial “Dog Whistles”

As far back as Reconstruction and the early Jim Crow era, white politicians have routinely engaged in race-baiting, or appealing to racial animus in the electorate, to generate political

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support (Mendelberg, 2001; Williams, 2010). Since the middle of the 20th century, however, surveys that measure the public's racial attitudes have documented a steep decline in overtly racist views (Schuman et al., 1997), such as biological racism as defined below. For much of the post-civil rights era, this decline in overtly racist views has been accompanied by a similar decline in political appeals that are overtly racial in nature.

In the late 20th century, whites' racial attitudes underwent a transformation, which some scholars note as beginning in the 1970s. This transformation was marked by a shift from biological racism to modern racism or racial resentment. Biological racism is the belief that African Americans are genetically and/or socially inferior to whites, whereas racial resentment is “a moral feeling that blacks violate such traditional values as individualism and self-reliance, the work ethic, obedience, and discipline” (Kinder and Sears 1981, 416). Similar claims have also been made about Latinos. As such, racial appeals or racial messages have also experienced a similar transformation. That is to say that racial appeals no longer explicitly make claims about Black or Latino genetic inferiority, but today, racial appeals include messaging that plays to negative stereotypes about African Americans' and Latinos' work ethic, discipline, self-reliance, and purported propensity for violence.

Research indicates that these stereotypes are deeply ingrained such that a non-trivial fraction of whites routinely rate African Americans and Latinos as less hardworking or more violent than whites. For example, in the most recent American National Election Study (2020), 34 percent of whites rated Black people as less hardworking than whites. The endorsement of this stereotype was slightly higher in the South, with 38 percent of Southern whites rating Black people as less hardworking than white people. 46 percent of Southern whites rate Black people as more violent than whites and 25 percent rate Latinos as more violent than whites. It is worth noting that when using less obtrusive measures of bias, such as the Implicit Association Test, bias against Blacks and Latinos appears to be even higher (Banaji and Greenwald 2013). The association of people of color with negative stereotypes, while socially undesirable in some circles, is deeply ingrained and is more likely to manifest when these biases are measured less obtrusively (i.e., in ways that do not require respondents to consciously make explicit racial statements).

The conventional wisdom is that in the post-civil rights era, most Americans have a commitment to the “norm of racial equality” (Mendelberg 2001). Mendelberg defines the norm of racial equality as “the prohibition against making racist statements in public” (2001, 17), personal repudiation of “the sentiments that have come to be most closely associated with the ideology of white supremacy—the immutable inferiority of Blacks, the desirability of segregation, and the just nature of segregation in favor of whites” (19), and commitment to “basic racial equality [and] in particular to equal opportunity” (18).

In other words, a social prohibition exists against espousing ideas that may indicate belief in the biological or inherent inferiority of Blacks, Latinos, or racial and ethnic minorities more broadly. This means that in the post-civil rights era, politicians may continue to appeal to negative predispositions about Blacks and Latinos, but rather than being critiqued for their inherent inferiority, people of color are criticized, sometimes implicitly, for their lack of work ethic and unwillingness to adhere to American values. Thus, the conventional wisdom is that politicians who want to activate some white Americans' negative racial predispositions opt instead to use

racially coded language, often called “dog whistles,” that could be plausibly perceived as unrelated to race but will nonetheless attract support for themselves or diminish support for their opponents among voters with racial attitudes.

If the message is explicit, with direct references to race or racial groups, the theory of racial priming, as developed by Mendelberg (2001), posits that voters will become aware of the racial content and reject the appeal. According to the theory, once voters are aware of the racial content of an appeal, they will dismiss it because they will perceive it as violating shared norms of racial equality or the prohibition against racist speech—in other words, they do not want to think of themselves as a racist or to be outwardly perceived by others as being racist.

This prohibition against explicitly racist speech is best summed up by Republican campaign strategist, Lee Atwater, in what he thought was an anonymous interview, “You start out in 1954 by saying, ‘Nigger, nigger, nigger.’ By 1968 you can’t say ‘nigger’—that hurts you. Backfires. So you stay stuff like forced busing, states’ rights and all of that stuff” (Perlstein 2012). In other words, Atwater was suggesting that in the post-civil rights era, explicit racism was not socially acceptable, but that discussing “forced busing” and “states’ rights” could replace explicit racial appeals.

What Constitutes a Racial Dog Whistle?

There is a robust literature that demonstrates the power of racially coded language to activate or prime voters’ racial predispositions. Racially coded language includes terms that invoke racial themes without ever explicitly mentioning race. In American society, well-researched examples include, “law and order,” “tough on crime,” “inner-city,” and “illegal immigration.” (Stephens-Dougan 2021). Research also indicates that, in addition to racially coded language, negative stereotypical imagery also has the power to prime voters’ racial predispositions. Negative stereotypical imagery that might activate voters’ negative racial attitudes includes depictions of African Americans or Latinos as criminals or welfare recipients.

Research indicates that stereotypical images and racially coded language are connected to bundles of associations about race called racial schemas. In the American context, racial schemas typically include beliefs about fairness and personal responsibility and a sense of zero-sum group competition¹⁰, (Winter 2008). According to the theory of racial priming, racial schemas become relevant to how people vote when racial schemas are activated by racially coded language or negative racial imagery depicting people of color. Thus, racial codewords and stereotypical imagery are relevant in many public policy discussions. Policies that have become racialized include welfare, crime, affordable housing, the death penalty, and Medicaid (Winter 2008; Hurwitz and Peffley 2007). Race, therefore, still plays a significant role in politics, even when it is not explicitly discussed.¹¹

Welfare

¹⁰ The sense that a gain for an outgroup, is automatically a loss for one’s own ingroup.

¹¹ In the section that follows, I will be discussing the use of racial appeals in various policy areas. Much of this research relies on survey experiments and the use of various metrics of racial attitudes, namely the racial resentment scale and the negative stereotypes scale. For a more detailed discussion of these metrics and methodology, please see the Appendix.

Many white Americans think African Americans are lacking in personal responsibility, work ethic, and willingness to “play by the rules” (Kinder and Sanders 1996). Therefore, appeals that tie racialized policies such as welfare to themes of fairness and personal responsibility have been shown to activate racial attitudes (Bobo and Kluegel 1993, Gilens 1999, Sears et al. 2000). For example, Gilens (1999) convincingly demonstrates that the reason that welfare has traditionally been an unpopular policy among white Americans is because media framings have made it such that many white Americans associate welfare with African Americans.

In his study, Gilens (1999) found that while African Americans made up about 30 percent of the poor, about 60 percent of the poor people shown on network television news and depicted in the major newsweeklies between 1988 and 1992 were Black. Similarly, the media portray low-income African Americans in a disproportionately negative light. Every single picture in newsweekly stories about the “underclass” between 1950 and 1992 showed African Americans. In sharp contrast, in more sympathetic stories about poverty, only one-fourth of the people pictured were African American. Admittedly, the Gilens study is now several decades old, but the point is that there is a long-term association of African Americans with welfare in the American psyche that is still relevant today. Therefore, when politicians invoke the issue of welfare, many whites’ negative attitudes about African Americans are activated, and white voters subsequently become less supportive of the policy.

More recently, during the Obama era, there were numerous examples of how welfare was used in racialized attacks. For example, during the 2012 presidential campaign former House leader and Republican presidential candidate, Newt Gingrich routinely referred to President Obama as the “most successful food stamp president in American history,” on the campaign trail. Gingrich also noted that if the NAACP invited him to their annual convention he would attend and “talk about why the African American community should demand paychecks and not be satisfied with food stamps.”¹² Previous research demonstrates that the food stamp program has become identified as a “Black” social welfare program over time, such that the mere mention of “food stamps” or “welfare” activates many white Americans’ negative attitudes about African Americans (Gilens 1999; Williams 2010; Winter 2008). By associating Obama with food stamps, Gingrich was likely making negative racial attitudes toward Black people more salient in the decision calculus of many white voters (Stephens-Dougan 2020).

Former Republican senator from Pennsylvania and presidential hopeful Rick Santorum also utilized racial dog whistles related to welfare against Obama during his presidential bid. During a campaign stop in Iowa, Santorum told a mostly white audience that he did not want to, “make Black people’s lives better by giving them someone else’s money; I want to go out and give

¹² Gingrich doubled down on his use of the term “food-stamp president” during a Republican primary debate in Myrtle Beach, South Carolina. One of the panelists was Juan Williams, an African American conservative commentator, who suggested that some people might find Gingrich’s comments about the “food-stamp president” offensive. Gingrich’s widely publicized response in which he derided “political correctness” was reported to have been met with the only standing ovation of the night. Gingrich also went on to use the exchange with Williams in a television ad that aired in South Carolina.

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them the opportunity to earn the money.”¹³ Santorum later denied that his comments were about Black people, and claimed that he said “blah people.” However, Santorum’s comments could be interpreted as implying that Obama, who was president at the time, was trying to make Black people’s lives better by giving them someone else’s (white people’s) money, rather than giving them the opportunity to go out and earn the money (Stephens-Dougan 2020).

In a similar vein, in September 2012, the Republican presidential nominee Mitt Romney told an audience of donors that “47 percent” of the country was comprised of “takers” who would inevitably vote for Obama and “his entitlement society” (Klein 2012; Corn 2012). According to Romney, Obama’s supporters were people who “are dependent on government, who believe that they are victims, who believe the government has a responsibility to care for them, who believe they are entitled to healthcare, to food, to housing, to you-name-it.” The implication is that Obama supporters, and by extension, Obama, want to depend on government assistance rather than adhering to the American value of hard work. And of course, given the widely known racial voting patterns present throughout the country, the “47 percent” of the country that would inevitably vote for Obama automatically calls to mind a group that is largely comprised of people of color.

Romney also used racial dog whistles related to welfare in his televised campaign advertisements against Obama, including “The Right Choice,” which aired the summer before the 2012 presidential election. The ad falsely accused Obama of doing away with the work requirements that accompany welfare benefits. “Under Obama’s plan you wouldn’t have to work, and you wouldn’t have to train for a job. They just send you your welfare check.”¹⁴ The language in the ad was juxtaposed with images of exclusively “hardworking” white Americans or at the very least white Americans engaged in what appears to be blue-collar factory work, wiping away sweat from their brows. The message was clear—welfare recipients, whom many white Americans falsely perceive as predominantly Black, would just receive a check in the mail, at the expense of hardworking whites.

Of course, this is not an exhaustive list, but the aforementioned examples highlight how the issue of welfare can be used in a racialized manner.

Crime

Crime is another issue that research indicates has become tightly linked to attitudes about Black people (Hurwitz and Peffley 1997). Evidence indicates that Black people are overrepresented as perpetrators of crime in the local news compared to whites and compared to real-crime statistics (Dixon and Linz 2000). Therefore, such an information environment may prompt viewers to associate African Americans with criminal behavior. In the short term, exposure to such stories has been shown to exacerbate negative racial attitudes and boost white support for punitive crime policies (Gilliam & Iyengar, 2000) and white support for those politicians who campaign on punitive crime policies (Valentino 1999).

¹³ Rick Santorum, “Campaign Stop,” Sioux City, IA, January 1, 2012, <https://www.npr.org/sections/itsallpolitics/2012/01/03/144613385/santorum-explains-his-comments-about-black-people-and-entitlements>.

¹⁴ PolitiFact and FactChecker.org gave the ad their most dishonest rating.

Moreover, since crime has become so racialized, even exposure to crime-related news stories devoid of Black criminals can prime racial attitudes, enhancing their impact on political decision-making (Valentino 1999). Therefore, strategic politicians can bring up the issue of crime, or air advertisements about crime, that ultimately activate negative attitudes about Black people without ever mentioning race.

Perhaps, the most infamous example of the use of crime to activate whites' negative racial predispositions is in the 1988 presidential election. At that time, an ostensibly independent group aired a negative advertisement depicting the Democrat nominee, Michael Dukakis as weak on crime. The ad, called, "Weekend Passes," featured a mugshot of an African American prisoner in Massachusetts named William Horton, who, while released on a furlough program, raped a white Maryland woman, and bound and stabbed her boyfriend. Research indicates that pairing the photograph of the Black William Horton with the issue of crime in the 1988 presidential campaign powerfully primed racial considerations in candidate evaluations (Mendelberg 2001). This research shows that racial considerations can be brought to bear on candidate evaluations even when both candidates are white.

Presidential candidates including Barry Goldwater, Richard Nixon, Ronald Reagan, and George H.W. Bush used crime in their campaigns with talk of being "tough on crime" and/or supporting a "war on drugs" in the "inner cities." Critics have also argued that part of Bill Clinton's electoral success, especially among white Americans, can be attributed to his decision to be even tougher on crime than conservative Republicans (Lopez 2014; Murakawa 2014).

More recently, former President Trump emphasized a "law and order" theme in both his 2016 and 2020 presidential campaigns by portraying crime as out-of-control. When he officially accepted the Republican nomination in 2016, he said, "An attack on law enforcement is an attack on all Americans. I have a message to every person threatening the peace on our streets and the safety of our police: When I take the oath of office next year, I will restore law and order to our country" (quoted in Bacon, 2016, para.2). Research indicates that Trump's support for police effectively functioned as a dog-whistle among whites with high racial resentment. A 2020 study (Drakulich et al. 2020) found that support for the police was only associated with vote choice among those whites with high racial resentment. In other words, regardless of whether some broader spectrum of voters might in theory support law enforcement as a general principle, political appeals to law-and-order only actually directly affected the electoral decision making of whites who indicated high levels of racial resentment.

Immigration

Research indicates that many Americans associate Latinos with immigration, even at a time when most of the Latino population growth in the United States comes from native-born Latinos. The growth and dispersion of Latino populations has been shown to trigger feelings of racial and cultural threat among whites (Craig et al. 2018; Enos 2014, Hopkins 2010; Ostfeld 2018), increase conservative sentiment and Republican party support (Craig and Richeson 2014; Newman et al. 2018; Reny et al. 2018), and expand support for punitive anti-immigrant policy (Abrajano & Hajnal 2015). Pluralities or majorities of white Americans view Latino immigrants

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as welfare recipients, less educated than other Americans, and as refusing to learn English, taking jobs from other Americans, and having too many children (Bobo, 2001; Masuoka and Junn, 2013; Reny and Manzano, 2016).

Abrajano and Hajnal (2015) for example, find that white Americans' concerns about Latinos and immigration have led to support for less generous and more punitive policies that conflict with the preferences of much of the immigrant population. Specifically, their results indicate that living in a state with a relatively high population of Latinos is associated with a 10% decline in white Americans' willingness to reduce income inequality. They also find that whites living in states with larger Latino populations are less willing to invest in public education and more eager to punish criminals. In short, their results show a consistent relationship between the size of the local Latino population, which arguably functions as a racial cue, and white support for state policies across a variety of areas, including, notably the already-racialized issue of crime.

In the case of Latino candidates, research indicates that, rather than solely engaging in explicit negative considerations about Latinos as an ethnicity, which can violate the norm of racial equality, white Americans are also influenced directly through anti-immigrant and partisan attitudes regardless of the actual political ideology of the candidate. Thus, Latino candidates are penalized through the activation of anti-immigrant attitudes and partisanship (McConaughy et al. 2010). In a clever survey experiment, the researchers cue that a candidate is Latino by using the surname "Martinez." In one experimental condition, respondents are exposed to a website featuring a candidate named John Morgan running against a candidate name Frank Barry. In the second experimental condition, the website features the exact same photos and candidate information, but "John Morgan" was now named "Juan Martinez." That is, the only difference across the two conditions is the presence of Spanish surname to cue the Latino identity of one of the candidates.

The results of the survey experiment indicate that white Americans brought their sentiments on immigration directly to bear on their choice to vote for a Latino candidate. A Spanish surname on the ballot also cued partisanship, such that white Americans in the study assumed that the Latino candidate is a Democrat (McConaughy et al. 2010).

The downstream effect of activating partisanship and anti-immigrant sentiments is that some white voters are less likely to support Latino candidates when partisanship and anti-immigrant sentiment are activated. For example, for Republicans in the study with the highest level of anti-immigrant sentiment, the predicted likelihood of supporting candidate Morgan was .82, but dropped to .19 in the Martinez condition. Recall, Morgan and Martinez were *identical* candidates, save for the fact that Martinez had a Spanish surname. In short, group-based considerations such as nativism may be the more socially acceptable conduit for some white Americans to discriminate against Latino candidates as opposed to explicitly anti-Latino sentiments.

Racial Dog-Whistles During the Obama and Trump Eras

As previously noted, race plays a significant role in American politics, even when a Black candidate is not on the ballot. Moreover, a long line of research indicates that when a Black

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candidate is on the ballot, they frequently encounter difficulty winning elections outside of majority-minority districts. Much of this research suggests that a large swath of racially resentful voters are unlikely to support a Black candidate (Highton 2004; Williams 1990; Sigelman et al. 1995). Thus, it was not surprising that racial attitudes would play a prominent role during the historic presidential campaign of the nation's first Black president, Barack Obama. The historic nature of Obama's campaign made racial attitudes what Tesler and Sears (2010) refer to as "chronically accessible." Chronic accessibility means that a particular predisposition is almost inevitably and ubiquitously activated among voters because there is an especially strong connection between the attitude and the political evaluation in question. In other words, voters could not help but think about race when it came to the 2008 presidential election, since it was not lost on anyone that, if elected, Obama would be the nation's first Black president. Obama's very presence on the ballot was in and of itself a racial cue.¹⁵ Similarly for other racial and ethnic minority candidates, their very presence on the ballot is likely to activate fellow Americans' racial attitudes, and for many white Americans, those racial attitudes are negative.

The chronic accessibility of race both hurt and helped Obama during his 2008 presidential campaign, a phenomenon referred to as "the two sides of racialization." On the one hand, Obama generated tremendous support among racial liberals or those Americans who attribute racial inequality to structural factors. On the other hand, Obama generated immense opposition among those Americans who have negative beliefs about African Americans. The tremendous support among the least racially resentful voters, however, outweighed the opposition that his campaign generated among more racially resentful voters to allow him to win election (Sears and Tesler 2010).

Obama's victory, however, should not be taken as evidence that negative racial attitudes in the electorate did not hurt his campaign. Research indicates that Obama underperformed relative to similarly situated Democratic candidates and that this underperformance was because of some voters' negative attitudes about African Americans. In Galveston County in 2008, for example, Obama appears to have underperformed compared to the other Democrats running for statewide positions by between two to five percentage points.¹⁶ For example, Piston (2010) finds that negative stereotypes about African Americans eroded support for Obama in the 2008 presidential election. Specifically, whites who thought that African Americans are on average less hardworking and less intelligent than whites were less likely to vote for Obama.

Furthermore, this was not a case of people who have negative stereotypes of African Americans, just being less likely to vote Democratic candidates in general. The impact of these negative racial stereotypes was unique to Obama. Various statistical analyses demonstrate that belief in these negative racial stereotypes did not impact previous white Democratic presidential nominees in the same way they impacted Obama (Piston 2010). Similarly, other studies find that Obama underperformed in certain electorates relative to previous Democratic presidential

¹⁵ In a similar vein, when other Black and Latino candidates are on the ballot, it is likely that their very presence is a racial cue, especially when there is the potential for them to be "historic firsts." The vast majority of states have never had a Black or Latino politician hold statewide office, for example.

¹⁶ Texas Secretary of State Election Data. https://elections.sos.state.tx.us/elchist141_county84.htm.

nominees because of negative racial attitudes (Tesler and Sears 2010; Kinder and Dale-Riddle 2012).

In addition to Obama's very presence helping to make race salient, Obama was subjected to "racial dog whistles" that also helped make race salient during his presidential campaigns and two terms as president. For example, during the 2008 campaign, there were unsubstantiated claims that Obama was a Muslim, which was arguably an attempt to activate anti-Muslim attitudes. Research indicates that white voters with anti-Muslim attitudes were far less likely to vote for Obama in 2008 and 2012 than white voters who did not hold those attitudes. For example, Jardina and Stephens-Dougan 2021 find that a one-unit change on the anti-Muslim affect measure (how cold or warm they felt toward Muslims) resulted in a 22-point less favorable evaluation of Obama in both 2008 and 2012 (on a 100-point scale).¹⁷ There were also questions surrounding whether Obama was born in the United States, and thus, eligible to serve as president. Arguably, these were attempts to activate nativism and anti-Black attitudes. Previous research indicates that for many Americans, being American is implicitly synonymous with being white (Devos and Banaji 2005). Thus, candidates of color, including Obama are more susceptible to these attacks of being un-American.

Another example of how American citizenship is conflated with whiteness is evidenced in comments from Senate Minority Leader, Mitch McConnell. Prior to Republicans blocking a federal voting rights bill, at a conference on January 22, 2022, McConnell said, "The concern [about voter suppression] is misplaced because if you look at the statistics, African American voters are voting in just as high a percentage as Americans."¹⁸ The implications of these comments is that African Americans and Americans are two distinct groups. Research also indicates that Latinos are similarly stereotyped as unAmerican (Devos and Banaji 2005).

Racialization of Policy During the Obama Era

For many white Americans, Obama's ascent to the presidency posed a threat to white dominance in American politics (Parker & Barreto 2013), which led to Obama presiding over one of the most racially polarized eras in American politics (Tesler 2016). Racial attitudes spilled over into just about everything. Party identification, vote choices for Congress, public policy positions, and evaluations of prominent politicians, including Hillary Clinton, were all more divided by racial attitudes after Obama's eight years in the White House than they had been in the pre-Obama era.

Obama's position as the country's first African American president was associated with race permeating almost every political issue during his two terms in office, even prompting some racially resentful, non-college-educated whites to flee the Democratic party (Tesler 2016).

¹⁷ The most consistently available measure on the ANES is one that captures affect toward Muslims via a "feeling thermometer"—a standard affective measure in public opinion research, in which survey respondents are asked to rate a target group on a scale ranging from 0 to 100 in which values below 50 represent "cold" or negative attitudes toward the target and values above 50 indicate "warm" or positive feelings.

¹⁸ Bump, Phillip, "McConnell waves off voting concerns since Black people turn out as heavily as 'Americans,'" *Washington Post*, January 20, 2022. <https://www.washingtonpost.com/politics/2022/01/20/mcconnell-waves-off-voting-concerns-since-black-people-turn-out-heavily-americans/>

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Some scholars also argue that Obama's ascent to the presidency helped to contribute to the further racialization of party identification whereby racially conservative Americans are increasingly aligned with the Republican party and racially liberal Americans are aligned with the Democratic party (Parker & Barreto 2013, Tesler 2016).

For example, Tesler (2016) finds that party identification was more polarized by race during the Obama era than it was shortly prior to his ascendancy. During Obama's tenure, white racial liberals became increasingly Democratic, while racial conservatives became increasingly Republican. The most racially liberal whites moved nine points more Democratic in the 2008-12 ANES study than they had in 2000-2004, whereas the most racially conservative whites became about three points more Republican. Because partisanship is consistently one of the most influential predictors of political behavior, the growing racialization of partisanship is equivalent to the growing racialization of American politics more broadly, because race and partisanship are very intertwined in American politics. Moreover, when a core dividing line in a nation (partisanship) becomes so closely aligned with race and ethnicity, it suggests that many of our political disagreements are no longer dispassionate arguments about policies and ideals.

Obama's association with various public policies meant that many Americans linked their opinion of those policies with their attitudes about African Americans (Tesler 2016). Even public opinion on issues that were historically unrelated to race, such as healthcare, became closely linked to people's attitudes about race once Obama had taken a visible position on those issues (Tesler 2012). Tesler (2012) shows that whites' healthcare policy preferences were associated with racial resentment when healthcare reform was framed as Obama's plan but not when it was framed as Bill Clinton's plan. For example, when the plan was attributed to Clinton, the difference in support for healthcare between the least racially resentful respondents and most racially resentful respondents was 23 percent. However, when the identical health care plan was attributed to Obama, the difference in support between the least racially resentful respondents and most racially resentful respondents almost doubled to 40 percent (Tesler 2016). This difference is both substantively and statistically significant.

Racial Dog Whistles During the Trump Era

Racial and ethnocentric attitudes were deeply implicated in Donald Trump's ascent to the White House. Racial resentment, attitudes toward Muslims, and white identity were all much stronger predictors of support for Trump in the 2016 primaries than they were for prior Republican nominees. How could racial attitudes have become more influential in 2016 than they were in electing and reelecting the country's first African American president? The heightened salience of race during Obama's presidency almost guaranteed a prominent role for racial attitudes in the 2016 election, even without Obama on the ballot.

As noted earlier, Obama presided over the most racially polarized electorate that we have witnessed in modern times. Racially resentful whites are far more likely to identify as Republicans, and racially liberal whites are more likely to identify as Democrats (Tesler 2016; Engelhardt 2021). However, prior to the Obama era, racial attitudes and partisanship were not so tightly intertwined. For example, in the 1980s, there were "Reagan Democrats" who had high racial resentment, but still identified as Democrats.

Since 2008, however, many racially resentful whites have outright fled the Democratic party. Using survey data from the American National Election Studies, scholars contend that the eight years of Obama as the head of the Democratic party helped non-college educated whites “learn” about the racial liberalism of the Democratic party. According to this line of reasoning, college-educated whites were already aware of the racial differences of the two major parties, and thus had already sorted accordingly. But for non-college-educated whites, who had historically benefitted from the Democratic party’s pro-labor and other policies targeted at the working class, Obama helped them associate the Democratic party with greater racial liberalism (Tesler 2016; Sides et al. 2016).

Second, racial attitudes were more influential in 2016 than they were in 2008 or 2012, precisely because of Donald Trump. Obama polarized public opinion by racial attitudes because of who he was, and not because of what he said or did. As noted later in this Report, Obama arguably went to great lengths to avoid discussions of race. Conversely, Trump literally launched his campaign by injecting race:

On June 16, 2015, Donald J. Trump announced his campaign for president. Almost immediately, the businessman-turned-politician began a tirade in which he stated, “When Mexico sends its people, they’re not sending their best. They’re not sending you.....They’re sending people that have lots of problems, and they’re bringing those problems with us [*sic*]. They’re bringing drugs. They’re bringing crime. They’re rapists. And some, I assume, are good people” (Stephens-Dougan 2021).

Trump discussed race more explicitly than perhaps any politician in the modern era. His victory in 2016 is evidence that while racial codewords are in fact effective, a non-trivial fraction of the population is comfortable voting for a politician who uses messages that *openly* play to negative stereotypes of racial and ethnic minorities. In fact, research suggests that Trump’s 2016 presidential campaign had an emboldening effect, such that some voters felt more comfortable expressing prejudicial attitudes because of Trump’s normalization of racist rhetoric (Crandall et al. 2018, Newman et al. 2020).

How Candidates of Color Might Achieve Some Success Even Among Racially Resentful Whites

A long line of research finds that whites who are racially resentful, or who believe that African Americans do not uphold traditional American values like work ethic, are less likely to vote for Black candidates (Terkildsen 1993; Reeves 1997; Tesler and Sears 2010). Research also indicates that Black and Latino politicians are more likely to be stereotyped as liberal relative to identical white politicians (Sigelman et al. 1995; Jones 2014). Thus, white opponents of candidates of color in electoral contests have effectively invoked negative stereotypes of candidates of color, as a means of undermining their electoral success. These attacks may include the depiction of Black and Latino candidates as “too liberal,” especially on racialized policies such as welfare and crime.

Moreover, research also indicates that Black politicians have less latitude to call attention to the racial nature of attacks from their opponents. In other words, when an opponent invokes race in

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an electoral contest against a Black candidate, by raising racialized issues such as welfare or crime, Black candidates who “call out” the racial nature of the attack are largely penalized by white voters. Similarly situated white candidates, however, are not penalized (Tokeshi and Mendelberg 2015).

Candidates of color are well aware that they are likely to face attacks that play to negative stereotypes of their group, and thus may try to overcome these attacks through various strategies. One strategy that candidates of color might use is called “deracialization.” The originator of the term deracialization, political scientist Charles Hamilton (1977), initially intended the concept as a strategy by which the Democrats could regain some of the ground they had lost to the Republicans during the 1972 presidential election. Central to the theory of deracialization is the idea that white voters will not support a candidate of color who does not deemphasize her racial identity. The conventional wisdom is that if candidates of color can avoid associations with their racial identity, then they can minimize the salience of race in the campaign and assemble a broad, multiracial coalition.

Building upon the work of Hamilton (1977), McCormick and Jones (1993, 76) define deracialization as “conducting a campaign in a stylistic fashion that defuses the polarizing effect of race by avoiding explicit reference to race-specific issues, while at the same time emphasizing those issues that are perceived as racially transcendent, thus mobilizing a broad segment of the electorate for purposes of capturing or maintaining public office.” They also suggest that deracialization entails Black candidates presenting an image that is “reassuring to the white electorate” (76). This strategy is not without controversy because, at its core, it suggests that Black politicians cannot be too closely aligned with their African American community if they want substantial electoral support from white voters. Qualitative evidence suggests that this strategy has been successful (Gillespie 2009), but it is difficult to estimate the counterfactual (i.e. would deracialized candidates have won if they did not run deracialized campaigns?). To my knowledge, to date, no research employs an experiment to compare the effectiveness of a deracialization strategy relative to a racialized strategy.¹⁹ Furthermore, real-world candidates, who are risk-averse are unlikely to run a pro-minority campaign when running in a majority-white jurisdiction.

It is worth noting that although the vast majority of deracialization research has focused on Black candidates, research indicates that Latino candidates running for office in majority-white jurisdictions are also incentivized to run deracialized campaigns (Juenke and Sampaio 2010). Juenke and Sampaio (2010) conducted a study of Ken and John Salazar’s successful campaigns in 2004 and find that conservative whites responded positively to Ken Salazar’s deracialized campaign to represent Colorado in the U.S. Senate.²⁰ Relying on exit poll data from Ken Salazar’s 2004 campaign for the U.S. Senate, Juenke and Sampaio (2010) find that racially polarized voting was virtually non-existent in the parts of Colorado, where the Salazar campaign emphasized a deracialized approach. Instead, Salazar was able to attract both white and

¹⁹ For an exception, see Stephens-Dougan 2020, discussed later in the Report. However, this study compares to deracialization to a racialized strategy that invokes *negative* stereotypes of African Americans. We do not know how a deracialized strategy compares to a racialized strategy that is pro-African American.

²⁰ John Salazar also ran successfully to represent Colorado’s third congressional district in the U.S. House of Representatives.

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Republican crossover votes at significantly higher levels than in the rest of the state (Juenke and Sampaio 2010).

Also, of note, both John and Ken Salazar packaged themselves and their policy platforms to appeal to Republicans and independents, highlighting the interests of rural Colorado without invoking unwarranted racial attention on issues such as immigration. In fact, websites for both Ken and John Salazar's campaigns were available in English only. They opted to not provide Spanish translations of their websites. This is of particular interest when one considers that both the Democratic and Republican national parties provided Spanish translations of their websites, as did Ken Salazar's Republican opponent, Pete Coors. Moreover, both Salazar brothers were subjected to overt attempts by their Republican opponents to racialize their campaigns, with print and television ads emphasizing their support for policies such as driver's licenses for undocumented immigrants, comprehensive immigration reform, in-state tuition for undocumented immigrant students, and a new guest worker program. These ads used of dark lighting, grainy photographs of the brothers, and the racial trope of immigrants streaming over a fence. The Salazar brothers never called out the racialized nature of these attacks (Juenke and Sampaio 2010).

In addition to deracialization, another strategy that politicians of color might employ as a means of obtaining significant electoral support from white voters is a strategy called "racial distancing." This strategy is characterized by politicians distancing themselves rhetorically, visually, and even substantively from racial and ethnic minorities, often through rhetoric that invokes negative stereotypes about people of color (Stephens-Dougan 2020). Racial distancing is distinct from deracialization because it entails taking a stance on racial matters, albeit in a manner that indicates the politician will not be beholden to their constituents of color. Again, this strategy suggests that candidates of color who are perceived as too closely aligned with other people of color are not palatable to white voters.

Racial distancing theory posits that when trying to win elections in majority-white jurisdictions, candidates who signal that they will maintain the racial status quo, which is characterized by white dominance in political, social, and economic institutions, will fare better than candidates who make no such indication. Since politics is largely about which politician can deliver resources to a voter's group, even candidates of color can gain electoral support from white Americans who have animus toward racial and ethnic minorities, as long as they signal that they will maintain the racial status quo.

While deracialization and racial distancing are both approaches by which candidates can "enhance effectively the likelihood of white electoral support," Black and Latino candidates in particular might prefer to engage in racial distancing above and beyond a strategy of deracialization. Black and Latino candidates are more likely to be perceived as liberal and preoccupied with minority rights (Jones 2014). Therefore, racial distancing may be more effective in helping dispel some of the negative stereotypes that are associated with Black and Latino candidates relative to a strategy of deracialization, which simply avoids the topic of race altogether.

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For example, in a 2016 study of a nationally representative sample of 500 whites, Republicans in the sample were on average 15 to 20 percentage points more likely to vote for a Black Democrat whose message emphasized negative stereotypes of “Black people needing to get off of the couch,” relative to a deracialized message that emphasized, “working together” (Stephens-Dougan 2020). Similar results were found when looking at whites who score high on the racial resentment scale, or at whites who endorsed the negative stereotype of Blacks as less hardworking than whites. Thus, messages that invoke negative stereotypes of people of color appear to be an effective means of garnering support from a non-trivial fraction of white voters.

When candidates of color discuss racial matters through a strategy of racial distancing, they are providing information that helps disrupt the stereotype of the candidate as racially liberal. Counter-stereotypical behavior provides individuating information and inhibits reliance on negative stereotypes (Hurwitz and Peffley 1998; Bobo and Kluegel 1993). A racial distancing strategy provides white voters with more information, relative to deracialization, and consequently helps disrupt the stereotype of Black and Latino candidates as liberal on racial matters and preoccupied with matters of race.

Cues like Republican partisanship and individualist messages are counter-stereotypical (Fields 2016). For precisely that reason, they fulfill the implicit expectations of racially resentful voters about the causes and remedies for racial disparities, thus prompting those voters to exceptionalize Black Republicans or Black politicians with individualist messages, and subsequently, change their voting behavior toward these particular minority candidates.

For example, Karpowitz et al. (2021) examine the effects of racial resentment in all 2010, 2012, and 2014 congressional races in which a Black candidate faced a white opponent. In races in which the Black candidate ran as a Democrat, the effect of racial resentment is negative and steep. Moving from the 10th percentile to the 90th percentile of racial resentment reduces the predicted probability of voting for the Black candidate from 68 percent to a mere 25 percent. In other words, racial resentment has a negative effect on support for Black Democratic candidates.

However, when the Black candidate is a Republican, Karpowitz et al. (2021) find that the effect runs in the opposite direction, increasing the predicted probability of voting for the Black candidate from about 9 percent to over 86 percent, moving from the 10th to the 90th percentile of racial resentment. The candidate’s political party thus reverses the effect of racial resentment on vote choice. The marginal effect of racial resentment is negative and strongly significant when the Black candidate is a Democrat but positive and strongly significant when the candidate is a Republican. In short, the partisan cue of “Republican,” helps make Black candidates attractive to racially resentful whites. Black Republicans fare quite well with racially resentful whites.

Yet, another strategy that Black or Latino candidates might employ to overcome racism in the electorate is “whitewashing.” Whitewashing entails highlighting the candidate’s commonality with and support from whites rather than merely avoiding issues associated with race (Hutchings et al. 2020). Hutchings et al. (2020) demonstrate that the 2008 Obama campaign whitewashed Obama’s image by drawing attention to his biracial ancestry and highlighting visual associations with white Americans to curry favor with some whites.

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Using a survey experiment, Hutchings et al. (2020) test whether white voters were less likely to believe rumors about Obama's citizenship and religion when they were exposed to a whitewashed version of a televised campaign advertisement relative to a race-neutral baseline condition. The results indicate that when an Obama campaign advertisement visually associated the candidate with whites and emphasized his biracial ancestry, Republicans in particular were less likely to believe rumors about Obama's citizenship and religion. Specifically, among Republicans who viewed the race neutral version of the ad, the likelihood of believing that Obama was "definitely" or "probably" born outside of the United States was 52 percentage points. However, the likelihood of believing that Obama was "definitely" or "probably" born outside of the United States was only 14 percentage points in the "whitewashed" version of the advertisement. It is worth noting that the whitewashed version of the advertisement was the advertisement that the Obama campaign actually ran. Moreover, these results suggest that race neutrality may not be sufficient for candidates of color to overcome racialized attacks.

Other scholarship has found that visual associations with racial and ethnic minorities can be detrimental to Democratic politicians. Stephens-Dougan (2016) finds that racially resentful voters were less likely to vote for white Democrats who included African Americans in their campaign mailers. Similarly, Ostfeld (2019) finds that as white Democratic voters learn about the Democratic party's outreach to Latino voters, they become less supportive of the Democratic party. Finally, Berinsky et al. (2020) find a backlash effect of up to eight percentage points in reported vote intention among white voters for a candidate whose campaign mailer includes exclusively Black images.

Taken together, these results indicate that being perceived as too closely aligned with racial and ethnic minorities harms candidates, which might explain why in his first term, Obama spoke about race less than any of his Democratic predecessors (Gillion, 2016).

In an attempt to overcome the negative stereotypes, candidates may engage in various strategies—deracialization, racial distancing, and whitewashing. These strategies all share a common thread—Black and Latino politicians do not necessarily have to cede the vote of racially resentful whites if they understand, and in some instances capitalize on, white racial resentment.

Racially resentful whites can actually be quite receptive to Black politicians—namely, when Black politicians behave in a manner that is counter-stereotypical to white voters' image of Black politicians as racially liberal (Hajnal 2007; Stephens-Dougan 2020; Karpowitz et al. 2021).

There are numerous examples of Black candidates, often Black Republicans who are able to win elections in majority-white, often racially conservative districts. For example, Mia Love, the first Black person to represent Utah in Congress won several Congressional elections in a district that was less than five percent Black. She publicly criticized the Congressional Black Caucus, saying, "They sit there and ignite emotions and ignite racism where there isn't" (Romboy 2012). Also, featured prominently on Love's website was a video referencing one of her father's favorite statements to her: "Mia, your mother and I never took a handout. You will not be a burden to society. You will give back." This statement from Love's father dispelled the

stereotype of an African American politician who would advocate for the expansion of the welfare state (Stephens-Dougan 2020).

Similar examples can be found from other prominent Black Republicans including Senator Tim Scott and former Secretary of Housing and Urban Development, Ben Carson. Scott, who delivered the Republican rebuttal to President Biden’s State of the Union address in 2021, vehemently stated that, “America is not a racist country,” which is a view that is more closely aligned with that of racially resentful whites than it is with people of color. Furthermore, both Scott and Carson have also made claims that they have experienced racism from the Left, but not from the Right, which may also be a means of distancing themselves from people of color and aligning themselves with racially resentful whites (Cobb 2015; Wootson and DeBonis 2021).

Section 3: Racialized Politics in Galveston County, Texas

While the primary purpose of this Report is to provide an account of the academic consensus on the relationship between race and partisan politics in America, particularly in the American South, rather than a comprehensive study of Galveston County specifically, nevertheless there are readily available examples showing that the intertwined racial and political phenomena discussed in the preceding sections exist within Galveston County.

Immigration and Crime

Immigration has played an unusual role in Galveston County politics given the distance of the County from the border and the general lack of role for county-level government in immigration policy. Despite the seeming lack of connection, Galveston County issued an emergency immigration disaster declaration in 2021 in order to send federal Covid-relief money to support immigration policing at the distant Texas border.²¹ This decision is notable because it took money intended for Covid-19 relief – an issue which research has been shown to have its own racialized dimensions (Stephens-Dougan 2022) – and redistributed that money to an issue that is of particular salience for racially resentful white voters (see Section 2 above).

Relying on a nationally representative sample of approximately 600 whites, Stephens-Dougan (2022) found that when whites who endorsed negative stereotypes of African Americans as less hardworking or less intelligent than whites were exposed to factual information about the disparate impact of Covid-19 on African Americans, those whites were less supportive of efforts to limit the spread of Covid-19. This decrease in support included decreased willingness to wear a facemask, a key preventative measure in slowing the spread of Covid-19.²² Therefore, the

²¹ Nick Natario, “Galveston County To Send COVID-19 Relief Money To fund the Border Wall and Security.” June 30, 2021. <https://abc13.com/texas-border-wall-counties-using-money-from-covid-relief-helping-fund-news/10844833>.

²² For example, Stephens-Dougan (2022) finds that the probability of indicating that it was “not at all important” or “not very important” to wear a face mask was 46% among whites who endorsed the stereotype, but who were exposed to race-neutral factual information about Covid-19. However, among white respondents who endorsed the negative stereotypes of Black people and were exposed to factual information about the disparate impact of Covid-19 on African Americans, the likelihood of indicating that mask-wearing was “not at all important” or “not very important,” was 75% ($p < 0.05$ for a one-tailed test). These results indicate that a critical preventative measure in

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decision to use Covid-19 funds toward immigration policing – an issue that is highly racialized – was in effect a signal to the electorate that the politicians pushing this issue were prioritizing the policy preferences of whites who endorse negative stereotypes of immigrants and minorities over the health and well-being of Blacks and Latinos who have been disparately impacted by Covid-19.

Policing and crime have also been salient topics in Galveston County, along with of course the national spotlight on them in recent years. Galveston County became a center of national attention in 2019 when a Black man in handcuffs was led down the street by a rope held by white police officers on horseback.²³ This viral image elicited comparisons to the antebellum period in which slave patrols captured enslaved people who unsuccessfully attempted to escape and made an example of them by parading them through town for all to see. Police shootings involving Black residents have led to local activism.²⁴ And diversity in the police force has been a publicized issue for multiple localities within the county.²⁵ Research finds that diversity in law enforcement can lead to improvements in how police treat people of color. A 2021 study found that Black officers made far fewer stops and arrests and used force less often on Black civilians than white officers facing common circumstances: differences equal to 29%, 21% and 32% of average white officer behavior respectively. Hispanic & female officers showed reduced activity too, by smaller margins (Ba et al. 2021).

Against the local and national backdrops of immigration and policing, anti-immigrant and tough-on-crime messages with strongly suggestive racial appeals have surfaced in recent years in Galveston electoral contests. For example, a campaign advertisement from County Judge Mark Henry centers on denouncing, without defining, the concept of defunding the police by splicing together footage of post-George Floyd-shooting Black Lives Matter protesters, one of the most salient racial issues in recent years.²⁶ The advertisement also references a “crime surge in Democratic led cities,” which is an overt attempt to tie Democratic politicians to the racially salient issue of crime. In reality, most cities, regardless of crime rates, have Democratic mayors because of the correlation between partisanship and urbanicity. For example, as of January 2022, 17 of the 20 largest cities in the United States have Democratic mayors.²⁷ The ad also prominently depicts a female Black organizer saying “we don’t want no mo’ police” as well as Representatives Alexandra Ocasio-Cortez and Cori Bush talking about the issue, both women of

fighting the coronavirus was perceived as less important when racially prejudiced whites were exposed to COVID-19 racial disparities information.

²³ Harmeet Kaur and Melissa Alonso, “A Black man who was led through Galveston, Texas, by police officers on horseback is suing the city for \$1 million.” CNN, October 12, 2020. <https://www.cnn.com/2020/10/12/us/galveston-horseback-arrest-lawsuit-trnd/index.html>

²⁴ James LaCombe, “Marchers call for action after police shooting in La Marque.” Galveston County Daily News, December 12, 2020. https://www.galvnews.com/news/marchers-call-for-action-after-police-shooting-in-la-marque/article_7522734e-dbbb-5195-b2c6-54a2f0d6971e.html

²⁵ Matt Degrood, “Galveston County law enforcement works on diversity.” Galveston County Daily News, July 17, 2020. https://www.galvnews.com/news/police/free/article_036c2431-b464-5eee-aad4-5164645122ae.html

²⁶ <https://twitter.com/JudgeMarkHenry/status/1575916835811139584?cxt=HHwWgICloeeA5N4rAAAA>

²⁷ Author’s calculations. https://ballotpedia.org/Party_affiliation_of_the_mayors_of_the_100_largest_cities

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color and representatives from the Democratic Party. The message ends by saying “vote Republican all the way down the ballot and keep Galveston safe.”

A copy of a political social media message, provided to me by Plaintiffs’ counsel, from County Commissioner Darrell Apffel exemplifies the practice of juxtaposing political appeals with negative stereotypical imagery to elicit racial attitudes without explicitly using racial language. It calls to mind the famous Michael Dukakis incident referenced on Page 19 of this Report.



In 2020, the Republican primary race for Tax Assessor-Collector, in which Jackie Peden challenged the incumbent Cheryl Johnson, featured a classic case of racialized political imagery and racial codewords. A campaign advertisement sponsored by the Peden campaign featured a photograph of an MS-13 gang member accompanied by language about illegal immigration: “Texans can thank Cheryl Johnson for having illegal immigrants vote in this November’s election!”²⁸ The man in the photograph is Latino, bare-chested, with tattoos on his torso, arms, and face.

It is also instructive to look at an advertisement from Commissioner Robin Armstrong when he was running for a Texas State Senate seat in 2022. In an advertisement, “Stand Up,” he pledges

²⁸ John Wayne Ferguson, “Johnson: Peden ad ‘racist,’ ‘discriminatory,’ and a ‘lie.’” Galveston County Daily News, February 22, 2020. https://www.galvnews.com/news/free/article_1f26ee77-55ca-5723-a493-28fdd78f15c5.html

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to “stand up” for voters by “fighting crime,” “fighting critical race theory,” and “securing our border.”²⁹ As noted earlier in the Report, crime and immigration are highly racialized, and can be used by strategic politicians to make racial resentment more consequential in white voters’ decision calculus. Research indicates that Armstrong, who is African American, might be especially advantaged with racially resentful white voters because as explained previously, some Black candidates, most notably Republicans, can benefit electorally from higher levels of racial resentment in the electorate by presenting themselves counter-stereotypically (Karpowitz et al 2021; Stephens-Dougan 2020). Mentioning opposition to critical race theory as well is an example of the racial distancing phenomenon discussed in Section 2.

These advertisements are a prototypical example of how strategic campaigns can use negative, stereotypical imagery of racial and ethnic minorities and racialized issues to activate negative racial attitudes. A long line of research (as discussed earlier in this document) indicates that stereotypical imagery, such as imagery that links racial and ethnic minorities with crime, activates stereotypical thinking. Similarly, just mentioning racialized issues such as immigration and crime can also activate stereotypical thinking. Once that stereotypical thinking is activated, it has been shown to reduce support, particularly from racially resentful white voters, for those candidates who are portrayed as being “soft on crime” (Reny et al 2020). In a majority white district, such strategies would logically be employed to help win a greater share of the white vote.

Public Housing

Proposals to build public housing in Galveston have been met with opposition and appear to have been a central, animating issue for the community after Hurricane Ike destroyed an existing stock of public housing.³⁰ Research finds that fear of crime is often tied to opposition to public housing, and as noted earlier, crime attitudes are closely bound up with race (Duke 2010).

Relatedly, Enos (2014) leverages the exogenous demolition of 12 large public housing developments in Chicago to test whether proximity to public housing has a conservatizing effect among whites. Due to the notorious hypersegregation of Chicago, the demolition of these housing developments removed 25,000 African Americans from the area, many of whom had lived in relatively close proximity to whites. He finds that voter turnout dropped by more than 10 percentage points for white voters living nearest to the public housing. This result can be considered evidence that whites living in close proximity to public housing experienced racial threat, but once their African American neighbors were removed, their sense of racial threat diminished considerably.

The change in turnout also varied by the size of the population that had been removed. The turnout of African Americans living nearby did not change. This result was maintained even when a number of alternative tests were considered. Furthermore, the results indicate that whites

²⁹ Dr. Robin Armstrong, “Stand Up.” <https://www.youtube.com/watch?v=StikJDXxAkM>.

³⁰ Edgar Walters, “It’s our form of apartheid”: How Galveston stalled public housing reconstruction in the 10 years after Ike.” Texas Tribune, April 16, 2018. <https://www.texastribune.org/2018/04/16/galveston-public-affordable-housing-hurricane-ike>. Forrest Wilder, “Galveston’s Nasty Public Housing Fight.” Texas Observer. April 5, 2012. <https://www.texasobserver.org/galvestons-nasty-public-housing-fight>.

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living near the public housing had voted more conservatively than whites living farther away and that this difference disappeared after the removal of their African American neighbors (Enos 2014).

Although Enos' 2014 study focused on Chicago, opposition to public housing can be bound up with race and racial threat in other locales, including, based on the explicit references to race in the media sources cited above, Galveston County .

Confederate Statues

In the aftermath of the “Unite the Right Rally” in Charlottesville in 2017, the removal of Confederate monuments has received great attention. Galveston County has been on jurisdiction where this issue became prominent. For example, Galveston County Judge Mark Henry said he would not support the removal of the Confederate soldiers monument in front of the Galveston County courthouse on 21st Street. “I would not support removing it.” “Where does this end? Today they’re offended by these statues. Tomorrow they’re offended by something else. Where’s the end of this?”³¹ Ultimately Judge Henry and the three County Commissioners representing majority white districts voted against removing confederate statues while the lone commissioner representing a majority non-white district voted to remove the statues.³²

For some, including Galveston County Judge Mark Henry, Confederate symbols could be described as innocuous tributes to Southern history and heritage. However, research indicates that Confederate symbols are correlated with racial animus among whites (Strother et al. 2017). In fact, Confederate symbols largely disappeared after the Civil War and were only reintroduced by white Southerners as a means of resisting the Civil Rights movement.

Strother et al. (2017) find in two separate surveys (one of white Georgians in 2004 and one of white South Carolinians in 2014), that racial resentment was strongly associated with support for the Confederate flag. In the South Carolina study, at the low end of the racial resentment scale, the predicted probability of reporting the respondent strongly feels the flag should be flown is 0.23, but at the high end of the racial resentment scale, that probability more than doubled to 0.63. This effect was statistically significant, even after controlling for partisanship, education, and other sociodemographic factors that could be potentially related to support for the Confederate flag.

Finally, also of note is that in the Georgia study, knowledge of Southern history was actually negatively related to support for the Confederate flag.³³ In other words, the results suggest that

³¹ Brooke A. Lewis, “Confederate statue in Galveston County will stay put — for now.” Houston Chronicle. Aug. 24, 2020), <https://www.houstonchronicle.com/news/houston-texas/houston/article/Confederate-statue-in-Galveston-County-will-stay-15511484.php>

³²John Wayne Ferguson,” Political Buzz: Henry says ‘no’ to removing Galveston’s Confederate statute.” Galveston County Daily News. Aug. 16, 2017, https://www.galvnews.com/news/article_4dd6245b-6917-5b86-b756-5f3b38e8f2b7.html

³³ Questions about the knowledge of Southern history were only available on the 2004 Georgia survey.

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support for the Confederate flag was more closely tied to animus rather than heritage (Strother et al. 2017). Similar results were found in a 2014 study by Hutchings et al. where they found in a representative sample of Georgians, white men became *more* supportive of the Confederate flag when they were told that it was endorsed by the Ku Klux Klan. These results suggest a political climate in which resistance to removing Confederate symbols is bound up with racial animus.

Racist Remarks

Thus far, much of the discussion about the racialized political climate in Galveston County has focused on policies, such as immigration, crime, and public housing, which are policies that have become racialized over time. These policies are by definition not about race but have become associated with race. The implicit role of race in politics was my primary focus for this Report. However, the Report's focus on implicit racial policies should not be interpreted as suggesting an absence of evidence of *explicit* racism in Galveston County.

There have been several publicized occurrences in recent years in which politicians have been recorded making disparaging remarks about people of color in Galveston County. These remarks are indicative of a hostile racial environment. Many of the allegations of racist remarks surfaced when the Combined Law Enforcement Associations of Texas turned over sworn affidavits and audio recordings from former La Marque council candidate Deanna Bethea and her husband, James Bethea, to the U.S. Attorney.

The recordings include people making a joke about the Ku Klux Klan and discussing policy on zoning requests. LaMarque Councilwoman, Connie Trube is heard on a 2014 recording talking about La Marque school board member Annie Burton, saying: "I hate to say this, but she really turned Black." She also says that Burton helped "gang up" with others on the school board: She got on the school board with the rest of the Blacks and they all just ganged up and that's why the school system has gone to hell."³⁴ These statements imply that Councilwoman Trube equates Blackness with decline.

Trube acknowledged making the remarks. Responding to reporter Joel Eisenbaum, who asked whether she had made the statement, Trube responded, "Yes they [the words] are and all you have to do is see the condition the school district is in right now," Trube said. "Is that a black-white issue?" Eisenbaum said. "I think so," Trube said.³⁵

In another instance, Trube is alleged to have suggested in 2012 to close the city library because "only Blacks use it."³⁶ Trube was eventually censured by the council.³⁷ At the council meeting

³⁴ Christopher Smith Gonzalez and T.J. Aulds. "LM police group calls for investigation after alleged racist remarks." Galveston County Daily News. May 30, 2014. https://www.galvnews.com/news/free/article_077059c8-e83e-11e3-8b66-001a4bcf6878.html

³⁵ Joel Eisenbaum. "Member of La Marque city council recorded making racist remarks." <https://www.click2houston.com/news/2014/06/04/member-of-la-marque-city-council-recorded-making-racist-remarks/>

³⁶ Harvey Rice. "La Marque councilwoman faces recall vote." Houston Chronicle. August 12, 2014. <https://www.chron.com/neighborhood/bayarea/news/article/La-Marque-councilwoman-faces-recall-5684601.php>

³⁷ Harvey Rice. "La Marque councilwoman faces recall vote." Houston Chronicle. August 12, 2014. <https://www.chron.com/neighborhood/bayarea/news/article/La-Marque-councilwoman-faces-recall-5684601.php>

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where Trube was censured, the council also voted to remove the Planning and Zoning Board Chairman, Chris Colombo, for using a racial slur about Councilman Chris Lane, who is African American.

Another incident in Galveston County that is indicative of a hostile racial environment involves a text from chairwoman for Galveston County's Republican party, Yolanda Waters. The text was a part of a months-long text message exchange in which Waters complained to another person about her local State Republican Executive Committee member — J.T. Edwards, who is Black. In the texts, she referred to him as a "Typical Nig." Waters claimed that she made an "unfortunate typo."³⁸

In an era where it is generally not acceptable to make explicitly racist remarks, the fact that such incidents still occur in Galveston County is indicative of a political environment where race permeates the landscape.

Conclusion

In this Report, I traced the historical realignment of partisan voting behavior in the American South based on race, beginning with the civil rights movement of the 1960s and continuing into the Twenty-First Century. I also reviewed the robust literature on racial priming that explores how strategic politicians can inject race into politics by raising ostensibly non-racial issues. The impact of racial priming is that voters often rely on negative racial stereotypes in their political decision calculus when they otherwise would not have done so. Lastly, I considered publicly available information on salient political and racial issues in Galveston County, Texas to determine whether the jurisdiction fits the well-accepted academic model of racial and partisan alignment.

The Report has three key takeaways: 1) Race and partisanship are deeply intertwined in the American South, such that it is virtually impossible to disentangle the two. 2) The injection of ostensibly non-racial issues such as crime and immigration into campaign content is likely to activate negative racial attitudes among a non-trivial fraction of whites, such that they bring those attitudes to bear on their political decisions, thus further entangling racial attitudes and partisan voting behavior. 3) Galveston County, Texas fits the well-accepted academic model of racial and partisan alignment.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct according to the best of my knowledge, information and belief.

Executed on: January 13, 2023


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³⁸ Patrick Svitek. "Top Texas Republicans pressure a county chair to resign over racist text." Texas Tribune. December 7, 2019. <https://www.texastribune.org/2019/12/07/texas-republicans-racist-text-resign>.

Report of Dr. LaFleur Stephens-Dougan

References

- Abrajano, M. and Hajnal, Z.L., 2015. *White Backlash*. Princeton: Princeton University Press.
- American National Election Studies. 2022. *ANES Time Series Cumulative Data File* [dataset and documentation]. September 16, 2022 version. www.electionstudies.org
- Ba, B.A., Knox, D., Mummolo, J. and Rivera, R., 2021. The role of officer race and gender in police-civilian interactions in Chicago. *Science*, 371(6530), pp.696-702.
- Bacon Jr, P., 2016. Trump and other conservatives embrace ‘Blue Lives Matter’ movement. *NBC News*.
- Ballotpedia. “Party affiliation of the mayors of the 100 largest cities”.
https://ballotpedia.org/Party_affiliation_of_the_mayors_of_the_100_largest_cities
- Banaji, M.R. and Greenwald, A.G., 2013. *Blindspot: Hidden biases of good people*. Bantam.
- Beck, P.A., 1977. Partisan dealignment in the postwar South. *American Political Science Review*, 71(2), pp.477-496.
- Berinsky, A.J., de Benedictis-Kessner, J., Goldberg, M.E. and Margolis, M.F., 2020. The effect of associative racial cues in elections. *Political Communication*, 37(4), pp.512-529.
- Berelson, B.R., Lazarsfeld, P.F. and McPhee, W.N., 1986. *Voting: A study of opinion formation in a presidential campaign*. Chicago: University of Chicago Press.
- Black, E. and Black, M., 1992. *The Vital South*. Cambridge: Harvard University Press.
- Black, E., Black, M. and Black, E., 2002. *The Rise of Southern Republicans*. Cambridge: Harvard University Press.
- Bobo, L. and Kluegel, J.R., 1993. Opposition to race-targeting: self-interest, stratification ideology, or racial attitudes?. *American Sociological Review*, pp.443-464.
- Bobo, L., 2001. Racial attitudes and relations at the close of the twentieth century. *America becoming: Racial trends and their consequences*, 1, pp.264-301.
- Bullhorn Communications. 2022. *Dr. Robin Armstrong “Stand Up.”*
<https://www.youtube.com/watch?v=StikJDXxAkM>.
- Bullock III, C.S., MacManus, S.A., Mayer, J.D. and Rozell, M.J., 2022. *African American Statewide Candidates in the New South*. Oxford: Oxford University Press.
- Bullock III, C.S. and Rozell, M. eds., 2021. *The new politics of the old South: An introduction to Southern politics*. Rowman & Littlefield.
- Bullock III, C.S., Hoffman, D.R. and Gaddie, R.K., 2005. The consolidation of the white southern congressional vote. *Political Research Quarterly*, 58(2), pp.231-243.

Report of Dr. LaFleur Stephens-Dougan

Bump, Phillip, “McConnell waves off voting concerns since Black people turn out as heavily as ‘Americans,’” *Washington Post*, January 20, 2022.

Campbell, Angus, Philip E. Converse, Warren E. Miller, and Donald Stokes. 1960. *The American Voter*. Chicago: University of Chicago Press.

Carmines, E.G. and Stimson, J.A., 1989. *Issue evolution: Race and the transformation of American politics*. Princeton: Princeton University Press.

Carmines, E.G. and Stanley, H.W., 1990. Ideological Realignment in the Contemporary South: Where Have All the Conservatives Gone?. *The Disappearing South? Studies in Regional Change and Continuity*, pp.21-33.

Cobb, Jelani. 2015. “Ben Carson’s Exonerating Racism” *The New Yorker*. September 22, 2015

Converse, Philip E. 1964. “The Nature of Belief Systems in Mass Publics.” *Critical Review* 18 (January): 1–74.

Corn, David. 2012. “Romney Tells Millionaire Donors What He REALLY Thinks of Obama Voters.” *Mother Jones*. September 17, 2012.

Craig, M.A. and Richeson, J.A., 2014. On the precipice of a “majority-minority” America: Perceived status threat from the racial demographic shift affects White Americans’ political ideology. *Psychological science*, 25(6), pp.1189-1197.

Craig, M.A., Rucker, J.M. and Richeson, J.A., 2018. Racial and political dynamics of an approaching “majority-minority” United States. *The ANNALS of the American Academy of Political and Social Science*, 677(1), pp.204-214.

Crandall, C.S., Miller, J.M. and White, M.H., 2018. Changing norms following the 2016 US presidential election: The Trump effect on prejudice. *Social Psychological and Personality Science*, 9(2), pp.186-192.

Davidson, C., 1990. *Race and class in Texas politics*. Princeton: Princeton University Press.

Degrood, Matt. 2020. “Galveston County law enforcement works on diversity.” *Galveston County Daily News*, July 17, 2020. [html](#)

Devos, T. and Banaji, M.R., 2005. American= white?. *Journal of personality and social psychology*, 88(3), p.447.

Dixon, T.L. and Linz, D., 2000. Overrepresentation and underrepresentation of African Americans and Latinos as lawbreakers on television news. *Journal of communication*, 50(2), pp.131-154.

Drakulich, K., Wozniak, K.H., Hagan, J. and Johnson, D., 2020. Race and policing in the 2016 presidential election: Black lives matter, the police, and dog whistle politics. *Criminology*, 58(2), pp.370-402.

Report of Dr. LaFleur Stephens-Dougan

Duke, J., 2010. Exploring homeowner opposition to public housing developments. *J. Soc. & Soc. Welfare*, 37, p.49.

Edsall, T.B. and Edsall, M.D., 1992. *Chain reaction: The impact of race, rights, and taxes on American politics*. WW Norton & Company.

Eisenbaum, Joel. 2014. "Member of La Marque City Council Recorded Making Racist Remarks." KPRC. June 4, 2014.

Engelhardt, A.M., 2021. Racial attitudes through a partisan lens. *British Journal of Political Science*, 51(3), pp.1062-1079.

Enos, R.D., 2014. Causal effect of intergroup contact on exclusionary attitudes. *Proceedings of the National Academy of Sciences*, 111(10), pp.3699-3704.

Eubank, N. and Fresh, A., 2022. Enfranchisement and Incarceration after the 1965 Voting Rights Act. *American Political Science Review*, pp.1-16.

Fields, Corey D. 2016. *Black Elephants in the Room: The Unexpected Politics of African American Republicans*. Oakland: University of California Press.

Ferguson, John Wayne. "Johnson: Peden ad 'racist,' 'discriminatory,' and a 'lie.'" *Galveston County Daily News*, February 22, 2020.

Ferguson, John Wayne. 2017. "Political Buzz: Henry says 'no' to removing Galveston's Confederate statute." *Galveston County Daily News*. Aug. 16, 2017.

Frey, W.H., 2020. Exit polls show both familiar and new voting blocs sealed Biden's win. *Brookings Institution*, 11, pp.12-20.

Gilens, M., 1999. *Why Americans Hate Welfare: Race, Media, and the Politics of Antipoverty policy*. Chicago: University of Chicago Press.

Gillespie, A. ed., 2009. *Whose Black Politics?* Taylor & Francis.

Gilliam Jr, F.D. and Iyengar, S., 2000. Prime suspects: The influence of local television news on the viewing public. *American Journal of Political Science*, pp.560-573.

Gillion, Daniel Q. 2016. *Governing With Words*. Cambridge, UK: Cambridge University Press.

Goldman, Seth K., and Diana C. Mutz. 2014. *The Obama Effect: How the 2008 Campaign Changed White Racial Attitudes*. New York: Russell Sage Foundation.

Gonzalez Smith, C. and T.J. Aulds 2023. "LM Police Group Calls for Investigation after Alleged Racist Remarks." *The Daily News*.

Green, D.P., Palmquist, B. and Schickler, E., 2002. *Partisan hearts and minds: Political parties and the social identities of voters*. Yale University Press.

Johnson, Thomas A. 1968. "Alienating the Negro Vote" *.The New York Times*

Report of Dr. LaFleur Stephens-Dougan

- Juenke, Gonzalez E. and Sampaio, A.C., 2010. Deracialization and latino politics: The case of the Salazar Brothers in Colorado. *Political Research Quarterly*, 63(1), pp.43-54.
- Hajnal, Z.L., 2007. *Changing white attitudes toward black political leadership*. New York: Cambridge University Press.
- Hamilton, Charles. 1977. "Deracialization: Examination of a Political Strategy. *First World*, March/April 1977: 3-5
- Hetherington, M.J. and Weiler, J.D., 2009. *Authoritarianism and Polarization in American politics*. New York: Cambridge University Press.
- Highton, B., 2004. White voters and African American candidates for congress. *Political Behavior*, 26(1), pp.1-25.
- Hopkins, D.J., 2010. Politicized places: Explaining where and when immigrants provoke local opposition. *American Political Science Review*, 104(1), pp.40-60
- Hurwitz, Jon, and Mark Peffley. 1998. *Perception and Prejudice*. New Haven: Yale University Press.
- Hutchings, V.L., Cruz Nichols, V., Gause, L. and Piston, S., 2021. Whitewashing: How Obama Used Implicit Racial Cues as a Defense Against Political Rumors. *Political Behavior*, 43(3), pp.1337-1360.
- Hutchings, V.L. and Jardina, A.E., 2009. Experiments on racial priming in political campaigns. *Annual Review of Political Science*, 12, pp.397-402.
- Hutchings, V.L., Walton Jr, H. and Benjamin, A., 2010. The impact of explicit racial cues on gender differences in support for confederate symbols and partisanship. *The Journal of Politics*, 72(4), pp.1175-1188.
- Jardina, A. and Stephens-Dougan, L., 2021. The electoral consequences of anti-Muslim prejudice. *Electoral Studies*, 72, p.102364.
- Jones, P.E., 2014. Revisiting stereotypes of non-white politicians' ideological and partisan orientations. *American Politics Research*, 42(2), pp.283-310.
- Kalkan, K.O., Layman, G.C. and Uslaner, E.M., 2009. "Bands of others"? Attitudes toward Muslims in contemporary American society. *The Journal of Politics*, 71(3), pp.847-862.
- Kane, J.V., Mason, L. and Wronski, J., 2021. Who's at the party? Group sentiments, knowledge, and partisan identity. *The Journal of Politics*, 83(4), pp.1783-1799.
- Karpowitz, C.F., King-Meadows, T., Monson, J.Q. and Pope, J.C., 2021. What leads racially resentful voters to choose black candidates?. *The Journal of Politics*, 83(1), pp.103-121.
- Kaur, Harmeet and Melissa Alonso, "A Black man who was led through Galveston, Texas, by police officers on horseback is suing the city for \$1 million." CNN, October 12, 2020.

Report of Dr. LaFleur Stephens-Dougan

Key VO Jr. 1949. *Southern Politics in State and Nation*. New York: Knopf

Kinder, D.R., Sanders, L.M. and Sanders, L.M., 1996. *Divided by color: Racial Politics and Democratic ideals*. University of Chicago Press.

Kinder, D.R. and Kam, C.D., 2010. *Us Against Them: Ethnocentric foundations of American opinion*. Chicago: University of Chicago Press.

Kinder, D.R. and Sears, D.O., 1981. Prejudice and politics: Symbolic racism versus racial threats to the good life. *Journal of personality and social psychology*, 40(3), p.414.

Kinder, D.R. and Dale-Riddle, A., 2012. *The End of Race?*. Yale University Press.

Kinder, D.R. and Kalmoe, N.P., 2017. *Neither Liberal nor Conservative*. University of Chicago Press.

Klein, E., 2012. Romney's theory of the 'taker class,' and why it matters. *Washington Post*, 17.

LaCombe, James "Marchers call for action after police shooting in La Marque." Galveston County Daily News, December 12, 2020.

Layman, G.C. and Carsey, T.M., 2002. Party polarization and "conflict extension" in the American electorate. *American Journal of Political Science*, pp.786-802.

Lopez, Ian Haney. 2014. *Dog Whistle Politics: How Coded Racial Appeals Have Reinvented Racism and Wrecked the Middle Class*. Oxford: Oxford University Press.

Lewis, Brooke A. 2020. "Confederate statue in Galveston County will stay put — for now." Houston Chronicle.

Mangum, M., 2013. The racial underpinnings of party identification and political ideology. *Social Science Quarterly*, 94(5), pp.1222-1244.

Masuoka, N. and Junn, J., 2013. *The Politics of Belonging: Race, public opinion, and immigration*. University of Chicago Press.

Maxwell, A. and Shields, T., 2019. *The Long Southern Strategy: How Chasing White Voters in the South Changed American Politics*. Oxford University Press, USA.

McCormick, J. and Jones, C.E., 1993. The conceptualization of deracialization: Thinking through the dilemma. *Dilemmas of Black politics: Issues of leadership and strategy*.

McConaughy, C.M., White, I.K., Leal, D.L. and Casellas, J.P., 2010. A Latino on the ballot: Explaining coethnic voting among Latinos and the response of White Americans. *The Journal of Politics*, 72(4), pp.1199-1211.

Mendelberg, T., 2001. *The Race Card*. Princeton University Press.

Mendelberg, T., 2008. Racial priming revived. *Perspectives on Politics*, 6(1), pp.109-123.

Report of Dr. LaFleur Stephens-Dougan

- Miller, W.E., Shanks, J.M. and Shapiro, R.Y., 1996. *The New American Voter* (pp. 140-46). Cambridge, MA: Harvard University Press.
- Montgomery, David. 2020. "The last Democratic presidential candidate to win Texas, Jimmy Carter, seeks to 'turn Texas blue.'" *New York Times*. October 30, 2020
- Morris, K., 2022. "Patterns in the Introduction and Passage of Restrictive Voting Bills are Best Explained by Race." Brennan Center for Justice.
- Murakawa, N., 2014. *The First Civil Right: How Liberals Built Prison America*. Oxford University Press.
- Newman, B.J., Shah, S. and Collingwood, L., 2018. Race, place, and building a base: Latino population growth and the nascent Trump campaign for president. *Public Opinion Quarterly*, 82(1), pp.122-134.
- Newman, B., Merolla, J.L., Shah, S., Lemi, D.C., Collingwood, L. and Ramakrishnan, S.K., 2021. The Trump effect: An experimental investigation of the emboldening effect of racially inflammatory elite communication. *British Journal of Political Science*, 51(3), pp.1138-1159.
- Ostfeld, M.C., 2019. The new White flight?: The effects of political appeals to Latinos on White democrats. *Political Behavior*, 41(3), pp.561-582.
- Parker, F.R., 1990. *Black Votes Count: Political Empowerment in Mississippi after 1965*. Chapel Hill: Univ of North Carolina Press.
- Parker, C.S. and Barreto, M.A., 2014. Change They Can't Believe In. In *Change They Can't Believe In*. Princeton: Princeton University Press.
- Peffley, M. and Hurwitz, J., 2007. Persuasion and resistance: Race and the death penalty in America. *American Journal of Political Science*, 51(4), pp.996-1012.
- Perlstein, R., 2012. Exclusive: Lee Atwater's infamous 1981 interview on the southern strategy. *The Nation*, 13.
- Petrocik, J.R., 1987. Realignment: New party coalitions and the nationalization of the South. *The Journal of Politics*, 49(2), pp.347-375.
- Piston, S., 2010. How explicit racial prejudice hurt Obama in the 2008 election. *Political Behavior*, 32(4), pp.431-451.
- Phillips, K.P., 1969. *The Emerging Republican Majority*. Princeton: Princeton University Press.
- Reeves, Keith. *Voting Hopes or Fears?: White voters, Black candidates and Racial politics in America*. Oxford University Press, 1997.
- Reinhard, D.W., 1983. *The Republican Right since 1945*. Lexington: University Press of Kentucky.

Report of Dr. LaFleur Stephens-Dougan

Reny, T. and Manzano, S., 2016. The negative effects of mass media stereotypes of Latinos and immigrants. *Media and minorities*, 4, pp.195-212.

Reny, T., Wilcox-Archuleta, B. and Nichols, V.C., 2018, December. Threat, mobilization, and Latino voting in the 2018 election. In *The Forum* (Vol. 16, No. 4, pp. 573-599).

Reny, T.T., Valenzuela, A.A. and Collingwood, L., 2020. “No, you're playing the race card”: Testing the effects of anti-black, anti-Latino, and anti-immigrant appeals in the post-Obama era. *Political Psychology*, 41(2), pp.283-302.

Rice, Harvey. 2014. “La Marque Councilwoman Faces Recall Vote.” Chron. August 12, 2014.

Romboy, D., 2012. Love Would ‘Take Apart ‘Congressional Black Caucus If Elected in Utah’s 4th Congressional District. *Deseret News*.

Schaffner, Brian; Ansolabehere, Stephen; Luks, Sam, 2021, “Cooperative Election Study Common Content, 2020”, <https://doi.org/10.7910/DVN/E9N6PH>, Harvard Dataverse, V4.

Schickler, E., 2016. *Racial Realignment*. Princeton: Princeton University Press.

Schuman, H., Steeh, C., Bobo, L. and Krysan, M., 1997. *Racial Attitudes in America: Trends and interpretations*. Cambridge: Harvard University Press.

Sears, D.O., Hetts, J.J., Sidanius, J. and Bobo, L., 2000. Race in American politics: Framing the debates. *Racialized Politics: The debate about racism in America*, pp.1-43.

Seawright, J. and Gerring, J., 2008. Case selection techniques in case study research: A menu of qualitative and quantitative options. *Political research quarterly*, 61(2), pp.294-308.

Sides, J., Tesler, M. and Vavreck, L., 2019. Identity crisis. In *Identity Crisis*. Princeton University Press.

Sigelman, C.K., Sigelman, L., Walkosz, B.J. and Nitz, M., 1995. Black candidates, white voters: Understanding racial bias in political perceptions. *American Journal of Political Science*, pp.243-265.

Stivek, Patrick. 2009. “Top Texas Republicans pressure a county chair to resign over racist text”. The Texas Tribune. December 7, 2019.

Strother, L., Piston, S. and Ogorzalek, T., 2017. Pride or prejudice?: Racial prejudice, southern heritage, and white support for the confederate battle flag. *Du Bois Review: Social Science Research on Race*, 14(1), pp.295-323.

Stanley, H.W., 1988. Southern partisan changes: Dealignment, realignment or both?. *The Journal of Politics*, 50(1), pp.64-88.

Stephens-Dougan, L., 2016. Priming racial resentment without stereotypic cues. *The Journal of Politics*, 78(3), pp.687-704

Report of Dr. LaFleur Stephens-Dougan

Stephens-Dougan, L., 2020. *Race to the bottom: How racial appeals work in American politics*. University of Chicago Press.

Stephens-Dougan, L., 2021. The persistence of racial cues and appeals in American elections. *Annual Review of Political Science*, 24, pp.301-320.

Stephens-Dougan, L., 2022. White Americans' Reactions to Racial Disparities in COVID-19. *American Political Science Review*, pp.1-8.

Svitek, Patrick. 2019. "Top Texas Republicans Pressure a County Chair to Resign over Racist Text." *The Texas Tribune*. December 8, 2019.

Terkildsen, N., 1993. When white voters evaluate black candidates: The processing implications of candidate skin color, prejudice, and self-monitoring. *American Journal of Political Science*, pp.1032-1053.

Tesler, M. and Sears, D.O., 2010. *Obama's race: The 2008 election and the dream of a post-racial America*. University of Chicago Press.

Tesler, M., 2016. Post-racial or Most-racial?. In *Post-Racial or Most-Racial?*. University of Chicago Press.

Tesler, M., 2012. The spillover of racialization into health care: How President Obama polarized public opinion by racial attitudes and race. *American Journal of Political Science*, 56(3), pp.690-704.

Tokeshi, M. and Mendelberg, T., 2015. Countering implicit appeals: Which strategies work?. *Political Communication*, 32(4), pp.648-672.

Valentino, N.A., 1999. Crime news and the priming of racial attitudes during evaluations of the president. *Public opinion quarterly*, pp.293-320.

Valentino, N.A. and Sears, D.O., 2005. Old times there are not forgotten: Race and partisan realignment in the contemporary South. *American Journal of Political Science*, 49(3), pp.672-688.

Westwood, S.J. and Peterson, E., 2020. The Inseparability of Race and Partisanship in the United States. *Political Behavior*, pp.1-23.

White, I.K. and Laird, C.N., 2020. *Steadfast Democrats*. Princeton University Press.

Williams, L.F., 2010. *Constraint of Race: Legacies of White Skin Privilege in America*. Penn State Press.

Williams, L.F., 2017. White/Black perceptions of the electability of Black political candidates. In *Black Electoral politics* (pp. 45-64). Routledge.

Winter, Nicholas J. G. 2008. *Dangerous Frames: How Ideas about Race and Gender Shape Public Opinion*. Chicago: University of Chicago Press

Report of Dr. LaFleur Stephens-Dougan

Wootson, Cleve R. J. and Mike DeBonis Sen. Tim Scott's comments on race ignite a fiery debate" April 29, 2021. The Washington Post.

Zhirkov, K. and Valentino, N.A., 2022. The Origins and Consequences of Racialized Schemas about US Parties. *Journal of Race, Ethnicity, and Politics*, pp.1-21.

Exhibit A

STEPHENS-DOUGAN EXHIBIT A

LAFLEUR STEPHENS-DOUGAN

214 Fisher Hall • Princeton NJ 08544 •
lafleurs@princeton.edu • 609-258-5376 (phone) • 609-258-1110 (fax)
lafleurstephensdougan.com

ACADEMIC APPOINTMENTS

Princeton University

Associate Professor of Politics July 2022-present
Assistant Professor of Politics July 2014-June 2022
Postdoctoral Research Associate, July 2013 –July 2014

Harvard University

Sheila Biddle Ford Foundation Fellow, Hutchins Center for African and African American Research, September 2017-May 2018

Massachusetts Institute of Technology

Pre-Doctoral Fellowship, Department of Political Science, July 2012- June 2013

EDUCATION

University of Michigan, Ann Arbor, MI

Ph.D. in Political Science and Public Policy, May 2013

University of Rochester, Rochester, NY

B.A., Political Science (Departmental Honors), May 2002

BOOKS

Stephens-Dougan, LaFleur. *The Color of Health: How Racial Attitudes Shape Public Health* (manuscript in preparation)

Very few studies have explored the relationship between racial attitudes and public opinion on health policy. Furthermore, the few studies in this area have primarily focused on public opinion on Obamacare. Therefore, we still know very little about how racial attitudes influence opinion about health policy outside the context of the nation's first Black president. *The Color of Health* argues that some diseases have become racialized, similar to other policy areas like welfare and crime. As a result, racial attitudes help drive public opinion on policies related to these diseases. I argue that we should expect to see racial attitudes matter for diseases such as Ebola, Zika, and of course, COVID-19 because of either the origin or the disparate impact of these diseases on people of color. Alternatively, racial attitudes should matter far less for certain types of cancers and other conditions that are not racialized because the "face" of those diseases are White Americans (i.e., breast cancer, ALS, etc.).

STEPHENS-DOUGAN EXHIBIT A

I rely on a mix of survey experiments and cross-sectional survey data to test my theory. For example, in a survey experiment funded by the National Science Foundation's Time-Sharing Experiments in the Social Sciences, I find that racially prejudiced White Americans are more resistant to COVID-19 restrictions when treated with information about the disease's disparate impact on African Americans. In addition, analysis of cross-sectional survey data from the 2020 American National Election Study indicates that in many instances, racial attitudes such as racial resentment and the perception that Black people have too much influence in politics matter as much, if not more, than partisanship for White Americans' attitudes about COVID-19. Thus, while it has been widely documented that the pandemic has unfolded mainly along partisan lines, these results indicate that racial attitudes are also a driver of opinion on COVID-19.

Stephens-Dougan, LaFleur. 2020. *Race to the Bottom: How Racial Appeals Work in American Politics*. Chicago: University of Chicago Press.

- 2021 Winner of the American Political Science Association Ralph J. Bunche Award (given to “the best scholarly work in political science that explores the phenomenon of ethnic and cultural pluralism.”)
- 2021 Winner of the International Society of Political Psychology David Sears Best Book Award (given to “the best book published in the field of the political psychology of mass politics.”)
- Reviewed in *Perspectives on Politics*, *The Forum*, and *The National Review of Political Science*.

ARTICLES

Stephens-Dougan, LaFleur. (2022). White Americans' Reactions to Racial Disparities in COVID-19. *American Political Science Review*, 1-8.

Fenton, J., & Stephens-Dougan, LaFleur. (2021). Are Black state legislators more responsive to emails associated with the NAACP versus BLM? A field experiment on Black intragroup politics. *The Journal of Race, Ethnicity, and Politics*, 7(2), 203-218.

Jardina, Ashley, & Stephens-Dougan, LaFleur (2021). "The electoral consequences of anti-Muslim prejudice." *Electoral Studies* 72: 102364.

Stephens-Dougan, LaFleur (2021). “The Persistence of Racial Cues and Appeals in American Elections.” *The Annual Review of Political Science*. 24: 301-320.

Stephens-Dougan, LaFleur (2016). "Priming Racial Resentment without Stereotypic Cues." *Journal of Politics* 78.3 (2016): 687-704. <https://doi.org/10.1086/685087>

BOOK CHAPTERS

Hutchings, Vincent and LaFleur Stephens. “The Role of Blacks in the Presidential Nomination Process” in William Mayer (ed), *In Pursuit of the White House 2008: How We Choose Our Presidents*. (2007). Chatham, NJ, Chatham House.

STEPHENS-DOUGAN EXHIBIT A

NON-PEER REVIEWED ARTICLES

Book Review of Davenport, Lauren. *Politics Beyond Black and White: Biracial Identity and Attitudes in America* (Cambridge University Press). (2019) *Perspectives on Politics*.

Book Review of Tesler, Michael. *Post Racial or Most-Racial?: Race and Politics in the Obama Era* (University of Chicago Press). *Political Research Quarterly* (2017) 132.2: 351-353.

WORKING PAPERS

“Moving Beyond Linked Fate: Toward a New Measure of Politicized Racial Identity” (with Kaiyla Banks, Jeron Fenton, Jasante Howard, Isaiah Johnson, Ismail White)

“Does Shared Disadvantage Foster Black and Latino Cooperation?” (with Davin Phoenix and Sonya Chen)

“The Influence of the Terms We Use on Racial Attitudes” (with Ashley Jardina)

“Racial Appeals and the Differential Role of Individualism Among Blacks and Whites” (with Ashley Jardina)

“I Get So Emotional: Race, Gender, and Candidate Evaluations” (with Andrea Benjamin and Davin Phoenix)

“The Role of Racial Attitudes and Identity in Affective Polarization (with Andrew Engelhardt)

OTHER WRITING

Joe Biden’s ‘Civility’ Comment Told Biased Whites What We Won’t Upset the Racial Order.” *Washington Post/Monkey Cage*. July 2, 2019.

FELLOWSHIPS, GRANTS, AND AWARDS

2020 National Science Foundation’s Time-Sharing Experiments for the Social Sciences Program Grant, “Racial Backlash Effect? White Americans’ Reactions to Racial Disparities in COVID-19.”

2020 National Science Foundation’s Time-Sharing Experiments for the Social Sciences Program Grant, “The Influence of the Terms We Use on Racial Attitudes.” (with Ashley Jardina)

2020 Russell Sage Foundation Pipeline Grant: “Shared Disadvantage, Shared Identity: Explaining When and Why White Americans Support Affirmative Action,” \$30,000

STEPHENS-DOUGAN EXHIBIT A

2020 Princeton University Dean of Faculty Addressing Racism Grant \$10,000

2020 Mamdouha S. Bobst Center Faculty Research Grant, \$25,000

2019 University Committee on Research in the Humanities and Social Sciences, Princeton University, \$6000

2019 Social Sciences Research Council Anxieties of Democracy Grant \$4,737

2019 Woodrow Wilson Foundation Nancy Weiss Malkiel Award, finalist

2016 University Committee on Research in the Humanities and Social Sciences, Princeton University Anonymous Undergraduate Research Grant \$2,016

2015 Princeton University Center for Human Values Faculty Grant \$30,000 (with Ashley Jardina)

2014 University Committee on Research in the Humanities and Social Sciences, Princeton University Research Grant \$10,000

2014 Princeton 250th Anniversary Fund for Innovation in Undergraduate Education Grant, \$55,500 (with Ali Valenzuela and Omar Wasow)

2014 Best Dissertation in Race and Ethnic Politics, American Political Science Association

2013 Fund for Experimental Social Science, Princeton University \$8000

2013-2015 Robert Wood Johnson Foundation Scholars in Health Policy Research Program, University of California at Berkeley (Declined)

CONFERENCE PRESENTATIONS & POSTERS

American Political Science Association Annual Meeting: 2022, 2018, 2013, 2012, 2011

Midwest Political Science Association Annual Meeting: 2019, 2014, 2013, 2012, 2009

National Conference of Black Political Scientists Annual Meeting: 2019, 2014, 2013, 2012, 2010

Social Science Research Council: Anxieties of Democracy Research Workshop, February 2019

INVITED TALKS

November 2022, More Than Every Four Years: When “Vote Harder” Won’t Get Us Free, Yale University (panelist)

STEPHENS-DOUGAN EXHIBIT A

November 2022, Book Manuscript Conference for Assistant Professor Leah Christiani, University of Tennessee, at Knoxville (discussant)

September 2022, Moving Beyond Linked Fate: Moving Toward a New Measure of Politicized Racial Identity, Symposium on the Politics of Immigration, Race, and Ethnicity, Emory University

University of Wisconsin-Madison, April 2022

University of California at Santa Barbara, February 2022

University College of London, December 2021

University of Essex, November 2021

Minority Politics Online Seminar Series, June 2021

UC Berkeley Book Salon for *Race to the Bottom*, May 2021

UCLA, Race, Ethnicity, and Politics Workshop, April 2021

Rutgers University, American Politics Workshop, April 2021

Columbia University, Identity Politics Research Group (rescheduled due to COVID-19)

Yale University American Politics and Public Policy Workshop, December 2020

University of Maryland Department of Political Science American Politics Workshop, December 2020

Princeton University Office of the Dean of Undergraduate Students, November 2020

Harvard University Hutchins Center for African and African American Studies, November 2020

American Political Science Association Roundtable on Examining the Role of Emotions in Black Politics, September 2020

International Society of Political Psychology Presidential Symposium on the Intersection of Black Politics and Political Psychology, July 2020

Chicago Area Political Behavior Workshop, Northwestern University, July 2020

American Political Science Association, Political Psychology Pre-Conference

Northwestern University, Department of Political Science, March 2019

STEPHENS-DOUGAN EXHIBIT A

University of Pennsylvania, Department of Political Science, February 2019

Cornell University, Department of Political Science, May 2018

University of California at Berkeley, Department of Political Science, April 2017

Columbia University, Department of Political Science, February 2017

Black Power at 50 Conference, Columbia University, October 2016

Rutgers University, Emerging Trends in Political Science, March 2014

University of California at Berkeley, Institute for Governmental Studies' Race, Immigration, and Ethnicity Colloquium, March 2014

TEACHING

Princeton University

Race and Politics in the United States (undergraduate), Spring 2018, Spring 2019, Spring 2020, Fall 2021

Race and Politics in the Age of Obama (undergraduate), Spring 2016

Introduction to American Politics: Political Behavior (graduate), Fall 2018, Fall 2015

Black Politics in the Post-Civil Rights Era (undergraduate), Spring 2015

Junior Paper Workshop on Race and Ethnic Politics (undergraduate), Fall 2014, Fall 2018, Fall 2019

ADVISING

Dissertation Committees

Sonya Chen

Chaya Crowder, Co-Chair (Assistant Professor, Loyola Marymount University)

Kabir Khanna

Alexander Kustov

J. Baxter Oliphant

STEPHENS-DOUGAN EXHIBIT A

Derek Wakefield

SERVICE TO THE DEPARTMENT AND PROFESSION

Reviewer for *American Political Science Review*, *American Journal of Political Science*, *DuBois Review*, *Journal of Politics*, *Journal of Race, Ethnicity, and Politics*, *Political Communication*, *Political Psychology*, *Political Behavior*, *Politics, Groups and Identities*, *Public Opinion Quarterly*.

International Society of Political Psychology Section Chair for Race, Gender, Ethnicity, and Religion (2021)

American Political Science Association Political Psychology Section Co-Chair (2021)

American Political Science Association Elections, Public Opinion, and Voting Behavior Section, Graduate Student Travel Award Committee (2019)

American Political Science Association REP Section Best Dissertation Award Committee (2019)

National Conference of Black Political Scientists, Section Chair on Identity Politics (2019)

Symposium on the Politics of Immigration, Race and Ethnicity, Co-Organizer (With Bernard Fraga, Daniel Gillion, Sophia Jordan Wallace) (2015-present)

Princeton University, Politics Department Undergraduate Advisor for the Track in Race and Identity (2021)

Princeton University, Co-Organizer of the Politics Research in Experimental Social Science (2013-present)

Princeton University, Senior Thesis Prize Committee (2015, 2016, 2019, 2020)

Princeton University, Aesthetics Committee (2019)

Princeton University, Faculty Advisor, Department of Politics Political Behavior Working Group (2015-2016)

EXHIBIT 23

*2014 General Election Results from the
Galveston County Website*

*[[https://www.galvestonvotes.org/home/
showpublisheddocument/7305/637595458881430000](https://www.galvestonvotes.org/home/showpublisheddocument/7305/637595458881430000)]*

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Straight Party

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Republican	DEM Democrat	LIB Libertarian	GRN Green	Totals
103 BS 39	14	151	83	248	0	00.00%	97	40	1	0	138
103 BS 76	9	59	58	126	0	00.00%	46	18	2	0	66
104 BS 39	10	164	113	287	0	00.00%	120	31	2	0	153
105 BS 39	3	19	13	35	0	00.00%	15	3	2	0	20
105-1 BS 50	22	79	79	180	0	00.00%	51	28	0	0	79
142 BS 38	63	411	277	751	0	00.00%	250	208	6	1	465
144 BS 57	79	465	273	817	0	00.00%	376	142	5	1	524
146 BS 38	65	461	331	857	0	00.00%	304	200	5	2	511
148 BS 38	132	641	444	1217	0	00.00%	430	230	1	2	663
150 BS 38	50	419	267	736	0	00.00%	271	168	0	1	440
151 BS 38	54	542	413	1009	0	00.00%	500	128	7	3	638
152 BS 47	149	1196	665	2010	0	00.00%	912	204	6	2	1124
159 BS 38	58	571	421	1050	0	00.00%	489	169	5	2	665
165 BS 41	43	420	384	847	0	00.00%	396	116	4	2	518
166 BS 47	2	2	1	5	0	00.00%	3	1	0	0	4
167 BS 47	170	953	514	1637	0	00.00%	783	165	9	1	958
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	492	113	12	2	619
172 BS 38	14	111	69	194	0	00.00%	101	36	0	0	137
192 BS 19	13	99	68	180	0	00.00%	89	33	0	0	122
193 BS 47	63	417	364	844	0	00.00%	401	86	3	1	491
197 BS 38	18	111	85	214	0	00.00%	105	36	3	1	145
218 BS 33	137	675	402	1214	0	00.00%	295	256	3	0	554
219 BS 42	6	115	91	212	0	00.00%	70	41	1	0	112
220 BS 34	9	83	46	138	0	00.00%	92	4	0	0	96
221 BS 33	87	368	318	773	0	00.00%	338	89	1	1	429
223 BS 33	98	460	357	915	0	00.00%	255	171	0	2	428
224 BS 33	119	564	415	1098	0	00.00%	281	280	4	3	568
225 BS 35	66	697	429	1192	0	00.00%	609	121	3	1	734
226 BS 35	58	348	281	687	0	00.00%	227	151	4	2	384
227 BS 34	82	608	329	1019	0	00.00%	375	82	8	2	467
228 BS 34	69	747	417	1233	0	00.00%	519	107	3	4	633
232 BS 33	1	0	0	1	0	00.00%	0	0	0	0	0
232-3 BS 37	10	122	53	185	0	00.00%	103	10	0	0	113
258 BS 34	43	410	304	757	0	00.00%	311	69	3	1	384
263 BS 58	93	1140	770	2003	0	00.00%	996	238	9	5	1248
274 BS 33	22	106	198	326	0	00.00%	156	38	1	2	197
275 BS 33	27	61	55	143	0	00.00%	81	19	0	1	101
276 BS 33	70	381	313	764	0	00.00%	242	122	3	2	369
277 BS 34	44	533	262	839	0	00.00%	325	67	5	1	398

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Straight Party

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Republican	DEM Democrat	LIB Libertarian	GRN Green	Totals
278 BS 34	64	549	329	942	0	00.00%	325	87	3	2	417
279 BS 34	21	201	148	370	0	00.00%	175	25	4	0	204
280 BS 35	0	32	16	48	0	00.00%	17	9	0	0	26
281 BS 35	2	48	34	84	0	00.00%	48	11	0	0	59
283 BS 34	10	75	32	117	0	00.00%	53	13	0	0	66
301 BS 50	9	163	125	297	0	00.00%	74	114	0	2	190
306 BS 50	130	724	519	1373	0	00.00%	305	392	8	2	707
309 BS 39	11	18	10	39	0	00.00%	9	4	1	0	14
311 BS 39	21	109	98	228	0	00.00%	20	149	2	0	171
314 BS 39	157	566	484	1207	0	00.00%	136	610	6	3	755
315 BS 50	139	547	425	1111	0	00.00%	171	414	3	7	595
316 BS 39	71	235	235	541	0	00.00%	88	252	2	1	343
330 BS 48	48	260	157	465	0	00.00%	86	225	1	2	314
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	32	45	0	0	77
334 BS 63	37	188	121	346	0	00.00%	28	259	0	0	287
336 BS 39	218	763	510	1491	0	00.00%	73	1141	2	3	1219
338 BS 50	102	562	368	1032	0	00.00%	238	451	4	1	694
340 BS 19	21	94	45	160	0	00.00%	11	115	1	1	128
341 BS 19	23	157	143	323	0	00.00%	104	88	4	0	196
343 BS 38	30	213	195	438	0	00.00%	117	178	5	0	300
345 BS 39	24	113	98	235	0	00.00%	18	181	2	0	201
347 BS 38	44	167	118	329	0	00.00%	53	189	4	1	247
389 BS 19	13	108	54	175	0	00.00%	47	90	0	1	138
391 BS 19	3	10	11	24	0	00.00%	10	7	0	0	17
394 BS 38	0	6	8	14	0	00.00%	7	3	0	0	10
398 BS 19	3	67	40	110	0	00.00%	34	37	0	0	71
399 BS 19	0	0	1	1	0	00.00%	0	0	0	0	0
439 BS 46	137	862	427	1426	0	00.00%	672	201	4	2	879
439-1 BS 52	0	14	1	15	0	00.00%	11	1	0	0	12
453 BS 72	140	643	483	1266	0	00.00%	571	146	10	4	731
454 BS 66	109	835	498	1442	0	00.00%	577	195	6	6	784
455 BS 55	0	6	5	11	0	00.00%	6	2	0	0	8
456 BS 46	155	937	459	1551	0	00.00%	911	113	8	1	1033
457 BS 46	159	1059	613	1831	0	00.00%	1103	131	9	0	1243
460 BS 46	143	1424	679	2246	0	00.00%	1281	181	7	1	1470
461 BS 46	60	840	539	1439	0	00.00%	825	126	7	1	959
462 BS 46	66	884	496	1446	0	00.00%	834	123	9	1	967
464 BS 55	125	654	388	1167	0	00.00%	550	112	5	4	671

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Straight Party

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Republican	DEM Democrat	LIB Libertarian	GRN Green	Totals
471 BS 46	3	49	14	66	0	00.00%	35	12	0	0	47
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	769	231	9	0	1009
488 BS 55	38	314	244	596	0	00.00%	305	67	2	1	375
490 BS 69	68	504	389	961	0	00.00%	465	114	5	0	584
166 BS 57	83	527	423	1033	0	00.00%	516	126	7	1	650
167 BS 57	0	3	0	3	0	00.00%	2	0	0	0	2
167 BS 77	28	185	90	303	0	00.00%	133	45	1	0	179
219 BS 43	10	51	57	118	0	00.00%	18	57	2	0	77
219 BS 44	1	8	8	17	0	00.00%	5	3	0	0	8
219 BS 45	10	58	48	116	0	00.00%	25	40	0	0	65
220 BS 35	12	124	95	231	0	00.00%	91	40	0	0	131
220 BS 53	43	435	402	880	0	00.00%	358	166	4	0	528
220 BS 54	0	0	2	2	0	00.00%	0	2	0	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	0	2
232 BS 37	17	94	86	197	0	00.00%	54	69	0	1	124
232 BS 67	7	22	11	40	0	00.00%	9	14	0	0	23
232 BS 68	38	240	143	421	0	00.00%	101	136	3	0	240
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	144	55	0	1	200
283 BS 53	20	297	315	632	0	00.00%	236	123	5	0	364
330 BS 49	24	161	127	312	0	00.00%	70	145	2	0	217
331 BS 48	8	27	18	53	0	00.00%	13	25	0	0	38
331 BS 49	6	7	4	17	0	00.00%	1	5	0	0	6
331 BS 65	83	394	232	709	0	00.00%	67	437	0	1	505
331 BS 64	0	13	7	20	0	00.00%	7	5	0	0	12
399 BS 28	2	10	6	18	0	00.00%	6	7	1	0	14
399 BS 31	3	22	14	39	0	00.00%	10	20	0	0	30
453 BS 73	1	19	7	27	0	00.00%	14	5	1	0	20
454 BS 72	1	4	4	9	0	00.00%	3	1	0	0	4
455 BS 56	102	356	234	692	0	00.00%	289	105	6	1	401
471 BS 66	21	402	266	689	0	00.00%	300	89	2	2	393
482 BS 61	2	9	3	14	0	00.00%	7	1	0	0	8
482 BS 62	6	16	6	28	0	00.00%	17	4	0	0	21
487 BS 66	1	12	7	20	0	00.00%	10	2	0	0	12
488 BS 56	43	439	298	780	0	00.00%	358	110	3	3	474
490 BS 70	42	222	193	457	0	00.00%	206	62	3	1	272
226 BS 34	3	64	21	88	0	00.00%	51	5	2	1	59
Totals	5221	35771	23958	64950	0		25823	12768	296	107	38994

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

United States Senator

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John Cornyn	DEM David M. Alameel	LIB Rebecca Paddock	GRN Emily "Spicybrown" Sanchez	Mohammed Tahiro	Totals
103 BS 39	14	151	83	248	0	00.00%	170	65	6	2	0	243
103 BS 76	9	59	58	126	0	00.00%	86	26	5	2	0	119
104 BS 39	10	164	113	287	0	00.00%	204	61	11	5	0	281
105 BS 39	3	19	13	35	0	00.00%	23	6	4	2	0	35
105-1 BS 50	22	79	79	180	0	00.00%	100	64	6	4	0	174
142 BS 38	63	411	277	751	0	00.00%	422	285	12	10	0	729
144 BS 57	79	465	273	817	0	00.00%	547	212	28	6	0	793
146 BS 38	65	461	331	857	0	00.00%	522	290	18	12	0	842
148 BS 38	132	641	444	1217	0	00.00%	768	370	37	16	0	1191
150 BS 38	50	419	267	736	0	00.00%	431	257	20	8	0	716
151 BS 38	54	542	413	1009	0	00.00%	727	206	35	11	0	979
152 BS 47	149	1196	665	2010	0	00.00%	1517	383	59	14	0	1973
159 BS 38	58	571	421	1050	0	00.00%	686	276	49	16	0	1027
165 BS 41	43	420	384	847	0	00.00%	610	180	38	7	0	835
166 BS 47	2	2	1	5	0	00.00%	3	2	0	0	0	5
167 BS 47	170	953	514	1637	0	00.00%	1255	303	46	9	0	1613
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	807	210	52	12	0	1081
172 BS 38	14	111	69	194	0	00.00%	136	52	3	1	0	192
192 BS 19	13	99	68	180	0	00.00%	122	50	4	0	0	176
193 BS 47	63	417	364	844	0	00.00%	591	182	41	5	0	819
197 BS 38	18	111	85	214	0	00.00%	149	50	6	2	0	207
218 BS 33	137	675	402	1214	0	00.00%	639	470	31	25	0	1165
219 BS 42	6	115	91	212	0	00.00%	132	64	5	3	0	204
220 BS 34	9	83	46	138	0	00.00%	121	14	1	0	0	136
221 BS 33	87	368	318	773	0	00.00%	561	167	22	9	0	759
223 BS 33	98	460	357	915	0	00.00%	511	331	18	21	0	881
224 BS 33	119	564	415	1098	0	00.00%	566	451	36	16	0	1069
225 BS 35	66	697	429	1192	0	00.00%	921	206	33	10	0	1170
226 BS 35	58	348	281	687	0	00.00%	421	211	22	11	0	665
227 BS 34	82	608	329	1019	0	00.00%	768	170	34	9	0	981
228 BS 34	69	747	417	1233	0	00.00%	943	207	35	13	0	1198
232 BS 33	1	0	0	1	0	00.00%	1	0	0	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	153	22	5	3	0	183
258 BS 34	43	410	304	757	0	00.00%	571	124	28	7	0	730
263 BS 58	93	1140	770	2003	0	00.00%	1494	413	59	19	0	1985
274 BS 33	22	106	198	326	0	00.00%	234	62	18	4	0	318
275 BS 33	27	61	55	143	0	00.00%	108	28	3	0	0	139
276 BS 33	70	381	313	764	0	00.00%	445	255	25	16	0	741
277 BS 34	44	533	262	839	0	00.00%	626	147	27	8	0	808

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

United States Senator

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John Cornyn	DEM David M. Alameel	LIB Rebecca Paddock	GRN Emily "Spicybrown" Sanchez	Mohammed Tahiro	Totals
278 BS 34	64	549	329	942	0	00.00%	689	163	39	9	0	900
279 BS 34	21	201	148	370	0	00.00%	296	48	11	6	0	361
280 BS 35	0	32	16	48	0	00.00%	32	14	1	0	0	47
281 BS 35	2	48	34	84	0	00.00%	65	17	1	1	0	84
283 BS 34	10	75	32	117	0	00.00%	82	29	5	1	0	117
301 BS 50	9	163	125	297	0	00.00%	113	166	6	3	0	288
306 BS 50	130	724	519	1373	0	00.00%	556	696	54	28	0	1334
309 BS 39	11	18	10	39	0	00.00%	26	8	4	0	0	38
311 BS 39	21	109	98	228	0	00.00%	35	176	4	7	0	222
314 BS 39	157	566	484	1207	0	00.00%	248	847	44	20	0	1159
315 BS 50	139	547	425	1111	0	00.00%	361	649	37	36	0	1083
316 BS 39	71	235	235	541	0	00.00%	161	330	12	15	0	518
330 BS 48	48	260	157	465	0	00.00%	143	290	7	13	0	453
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	48	63	3	1	0	115
334 BS 63	37	188	121	346	0	00.00%	43	292	4	1	0	340
336 BS 39	218	763	510	1491	0	00.00%	127	1318	9	13	0	1467
338 BS 50	102	562	368	1032	0	00.00%	390	587	21	9	0	1007
340 BS 19	21	94	45	160	0	00.00%	13	139	2	1	0	155
341 BS 19	23	157	143	323	0	00.00%	173	121	11	7	0	312
343 BS 38	30	213	195	438	0	00.00%	168	232	16	11	0	427
345 BS 39	24	113	98	235	0	00.00%	23	204	2	1	0	230
347 BS 38	44	167	118	329	0	00.00%	82	225	7	5	0	319
389 BS 19	13	108	54	175	0	00.00%	58	110	3	1	0	172
391 BS 19	3	10	11	24	0	00.00%	12	8	1	0	0	21
394 BS 38	0	6	8	14	0	00.00%	7	6	1	0	0	14
398 BS 19	3	67	40	110	0	00.00%	50	50	6	0	0	106
399 BS 19	0	0	1	1	0	00.00%	1	0	0	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	1007	325	49	13	0	1394
439-1 BS 52	0	14	1	15	0	00.00%	11	2	2	0	0	15
453 BS 72	140	643	483	1266	0	00.00%	894	287	44	12	0	1237
454 BS 66	109	835	498	1442	0	00.00%	948	378	58	27	0	1411
455 BS 55	0	6	5	11	0	00.00%	7	3	1	0	0	11
456 BS 46	155	937	459	1551	0	00.00%	1257	220	51	10	0	1538
457 BS 46	159	1059	613	1831	0	00.00%	1500	245	46	6	0	1797
460 BS 46	143	1424	679	2246	0	00.00%	1822	326	68	12	0	2228
461 BS 46	60	840	539	1439	0	00.00%	1147	222	42	9	0	1420
462 BS 46	66	884	496	1446	0	00.00%	1173	205	44	10	0	1432
464 BS 55	125	654	388	1167	0	00.00%	879	216	45	14	0	1154

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

United States Senator

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John Cornyn	DEM David M. Alameel	LIB Rebecca Paddock	GRN Emily "Spicybrown" Sanchez	Mohammed Tahiro	Totals
471 BS 46	3	49	14	66	0	00.00%	45	19	0	0	0	64
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1203	406	67	21	0	1697
488 BS 55	38	314	244	596	0	00.00%	443	117	24	3	0	587
490 BS 69	68	504	389	961	0	00.00%	702	208	27	10	0	947
166 BS 57	83	527	423	1033	0	00.00%	740	223	40	11	0	1014
167 BS 57	0	3	0	3	0	00.00%	2	1	0	0	0	3
167 BS 77	28	185	90	303	0	00.00%	214	70	12	5	0	301
219 BS 43	10	51	57	118	0	00.00%	33	77	2	2	0	114
219 BS 44	1	8	8	17	0	00.00%	8	8	0	0	0	16
219 BS 45	10	58	48	116	0	00.00%	57	53	1	2	0	113
220 BS 35	12	124	95	231	0	00.00%	146	71	10	2	0	229
220 BS 53	43	435	402	880	0	00.00%	560	264	29	12	0	865
220 BS 54	0	0	2	2	0	00.00%	0	2	0	0	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	0	0	2
232 BS 37	17	94	86	197	0	00.00%	94	93	4	2	0	193
232 BS 67	7	22	11	40	0	00.00%	17	23	0	0	0	40
232 BS 68	38	240	143	421	0	00.00%	196	197	11	8	0	412
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	223	90	9	4	0	326
283 BS 53	20	297	315	632	0	00.00%	395	189	23	16	0	623
330 BS 49	24	161	127	312	0	00.00%	114	180	10	0	0	304
331 BS 48	8	27	18	53	0	00.00%	18	33	1	0	0	52
331 BS 49	6	7	4	17	0	00.00%	10	5	0	1	0	16
331 BS 65	83	394	232	709	0	00.00%	125	546	8	10	0	689
331 BS 64	0	13	7	20	0	00.00%	11	9	0	0	0	20
399 BS 28	2	10	6	18	0	00.00%	8	7	2	1	0	18
399 BS 31	3	22	14	39	0	00.00%	11	26	0	0	0	37
453 BS 73	1	19	7	27	0	00.00%	17	6	2	1	0	26
454 BS 72	1	4	4	9	0	00.00%	4	3	0	1	0	8
455 BS 56	102	356	234	692	0	00.00%	465	178	18	11	0	672
471 BS 66	21	402	266	689	0	00.00%	476	179	20	5	0	680
482 BS 61	2	9	3	14	0	00.00%	12	2	0	0	0	14
482 BS 62	6	16	6	28	0	00.00%	21	4	3	0	0	28
487 BS 66	1	12	7	20	0	00.00%	14	4	2	0	0	20
488 BS 56	43	439	298	780	0	00.00%	549	179	29	8	0	765
490 BS 70	42	222	193	457	0	00.00%	335	92	19	3	0	449
226 BS 34	3	64	21	88	0	00.00%	74	6	4	1	0	85
Totals	5221	35771	23958	64950	0		41082	19659	2020	760	0	63521

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

United States Representative, District 14

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Randy Weber	DEM Donald G. Brown	LIB John Wieder	Totals
103 BS 39	14	151	83	248	0	00.00%	168	65	9	242
103 BS 76	9	59	58	126	0	00.00%	85	28	6	119
104 BS 39	10	164	113	287	0	00.00%	197	71	11	279
105 BS 39	3	19	13	35	0	00.00%	24	8	3	35
105-1 BS 50	22	79	79	180	0	00.00%	95	75	3	173
142 BS 38	63	411	277	751	0	00.00%	411	303	19	733
144 BS 57	79	465	273	817	0	00.00%	560	223	18	801
146 BS 38	65	461	331	857	0	00.00%	525	302	16	843
148 BS 38	132	641	444	1217	0	00.00%	772	398	26	1196
150 BS 38	50	419	267	736	0	00.00%	450	259	11	720
151 BS 38	54	542	413	1009	0	00.00%	734	223	28	985
152 BS 47	149	1196	665	2010	0	00.00%	1502	403	61	1966
159 BS 38	58	571	421	1050	0	00.00%	700	287	41	1028
165 BS 41	43	420	384	847	0	00.00%	616	196	21	833
166 BS 47	2	2	1	5	0	00.00%	3	2	0	5
167 BS 47	170	953	514	1637	0	00.00%	1233	328	46	1607
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	814	219	42	1075
172 BS 38	14	111	69	194	0	00.00%	136	51	0	187
192 BS 19	13	99	68	180	0	00.00%	122	50	4	176
193 BS 47	63	417	364	844	0	00.00%	607	198	29	834
197 BS 38	18	111	85	214	0	00.00%	152	53	4	209
218 BS 33	137	675	402	1214	0	00.00%	622	513	36	1171
219 BS 42	6	115	91	212	0	00.00%	135	68	4	207
220 BS 34	9	83	46	138	0	00.00%	122	12	1	135
221 BS 33	87	368	318	773	0	00.00%	558	188	18	764
223 BS 33	98	460	357	915	0	00.00%	505	345	26	876
224 BS 33	119	564	415	1098	0	00.00%	551	484	28	1063
225 BS 35	66	697	429	1192	0	00.00%	912	228	26	1166
226 BS 35	58	348	281	687	0	00.00%	430	226	13	669
227 BS 34	82	608	329	1019	0	00.00%	756	182	36	974
228 BS 34	69	747	417	1233	0	00.00%	967	212	25	1204
232 BS 33	1	0	0	1	0	00.00%	0	0	0	0
232-3 BS 37	10	122	53	185	0	00.00%	153	27	3	183
258 BS 34	43	410	304	757	0	00.00%	581	134	20	735
263 BS 58	93	1140	770	2003	0	00.00%	1507	433	41	1981
274 BS 33	22	106	198	326	0	00.00%	237	71	12	320
275 BS 33	27	61	55	143	0	00.00%	112	27	2	141
276 BS 33	70	381	313	764	0	00.00%	445	270	22	737
277 BS 34	44	533	262	839	0	00.00%	643	152	19	814

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

United States Representative, District 14

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Randy Weber	DEM Donald G. Brown	LIB John Wieder	Totals
278 BS 34	64	549	329	942	0	00.00%	702	177	31	910
279 BS 34	21	201	148	370	0	00.00%	296	48	18	362
280 BS 35	0	32	16	48	0	00.00%	33	14	0	47
281 BS 35	2	48	34	84	0	00.00%	62	20	2	84
283 BS 34	10	75	32	117	0	00.00%	78	33	4	115
301 BS 50	9	163	125	297	0	00.00%	116	168	4	288
306 BS 50	130	724	519	1373	0	00.00%	553	718	58	1329
309 BS 39	11	18	10	39	0	00.00%	26	7	3	36
311 BS 39	21	109	98	228	0	00.00%	32	184	4	220
314 BS 39	157	566	484	1207	0	00.00%	238	878	41	1157
315 BS 50	139	547	425	1111	0	00.00%	356	692	37	1085
316 BS 39	71	235	235	541	0	00.00%	153	351	13	517
330 BS 48	48	260	157	465	0	00.00%	152	296	7	455
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	48	67	1	116
334 BS 63	37	188	121	346	0	00.00%	40	297	4	341
336 BS 39	218	763	510	1491	0	00.00%	116	1336	11	1463
338 BS 50	102	562	368	1032	0	00.00%	396	604	17	1017
340 BS 19	21	94	45	160	0	00.00%	15	138	1	154
341 BS 19	23	157	143	323	0	00.00%	166	130	16	312
343 BS 38	30	213	195	438	0	00.00%	165	244	15	424
345 BS 39	24	113	98	235	0	00.00%	23	206	3	232
347 BS 38	44	167	118	329	0	00.00%	77	229	8	314
389 BS 19	13	108	54	175	0	00.00%	59	110	1	170
391 BS 19	3	10	11	24	0	00.00%	13	9	0	22
394 BS 38	0	6	8	14	0	00.00%	7	6	1	14
398 BS 19	3	67	40	110	0	00.00%	52	53	1	106
399 BS 19	0	0	1	1	0	00.00%	1	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	1003	354	40	1397
439-1 BS 52	0	14	1	15	0	00.00%	13	2	0	15
453 BS 72	140	643	483	1266	0	00.00%	898	299	40	1237
454 BS 66	109	835	498	1442	0	00.00%	961	405	46	1412
455 BS 55	0	6	5	11	0	00.00%	8	3	0	11
456 BS 46	155	937	459	1551	0	00.00%	1245	245	33	1523
457 BS 46	159	1059	613	1831	0	00.00%	1495	278	33	1806
460 BS 46	143	1424	679	2246	0	00.00%	1828	344	53	2225
461 BS 46	60	840	539	1439	0	00.00%	1153	236	38	1427
462 BS 46	66	884	496	1446	0	00.00%	1179	232	28	1439
464 BS 55	125	654	388	1167	0	00.00%	882	230	40	1152

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

United States Representative, District 14

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Randy Weber	DEM Donald G. Brown	LIB John Wieder	Totals
471 BS 46	3	49	14	66	0	00.00%	47	17	0	64
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1221	433	50	1704
488 BS 55	38	314	244	596	0	00.00%	453	121	13	587
490 BS 69	68	504	389	961	0	00.00%	703	224	22	949
166 BS 57	83	527	423	1033	0	00.00%	738	238	42	1018
167 BS 57	0	3	0	3	0	00.00%	2	1	0	3
167 BS 77	28	185	90	303	0	00.00%	216	78	7	301
219 BS 43	10	51	57	118	0	00.00%	32	77	3	112
219 BS 44	1	8	8	17	0	00.00%	9	8	0	17
219 BS 45	10	58	48	116	0	00.00%	57	54	1	112
220 BS 35	12	124	95	231	0	00.00%	149	74	5	228
220 BS 53	43	435	402	880	0	00.00%	567	285	16	868
220 BS 54	0	0	2	2	0	00.00%	0	2	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	2
232 BS 37	17	94	86	197	0	00.00%	100	90	4	194
232 BS 67	7	22	11	40	0	00.00%	16	24	0	40
232 BS 68	38	240	143	421	0	00.00%	198	204	10	412
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	224	98	7	329
283 BS 53	20	297	315	632	0	00.00%	397	207	19	623
330 BS 49	24	161	127	312	0	00.00%	114	181	11	306
331 BS 48	8	27	18	53	0	00.00%	18	34	0	52
331 BS 49	6	7	4	17	0	00.00%	9	7	0	16
331 BS 65	83	394	232	709	0	00.00%	119	565	5	689
331 BS 64	0	13	7	20	0	00.00%	11	8	0	19
399 BS 28	2	10	6	18	0	00.00%	8	7	3	18
399 BS 31	3	22	14	39	0	00.00%	10	25	0	35
453 BS 73	1	19	7	27	0	00.00%	17	5	3	25
454 BS 72	1	4	4	9	0	00.00%	4	4	0	8
455 BS 56	102	356	234	692	0	00.00%	464	185	25	674
471 BS 66	21	402	266	689	0	00.00%	475	190	14	679
482 BS 61	2	9	3	14	0	00.00%	12	2	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	28
487 BS 66	1	12	7	20	0	00.00%	15	3	1	19
488 BS 56	43	439	298	780	0	00.00%	559	183	24	766
490 BS 70	42	222	193	457	0	00.00%	340	98	13	451
226 BS 34	3	64	21	88	0	00.00%	77	5	3	85
Totals	5221	35771	23958	64950	0		41189	20698	1683	63570

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Governor

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Greg Abbott	DEM Wendy R. Davis	LIB Kathie Glass	GRN Brandon Parmer	Sarah M. Pavitt	Totals
103 BS 39	14	151	83	248	0	00.00%	160	83	2	1	0	246
103 BS 76	9	59	58	126	0	00.00%	80	34	6	0	0	120
104 BS 39	10	164	113	287	0	00.00%	192	80	9	2	0	283
105 BS 39	3	19	13	35	0	00.00%	22	11	2	0	0	35
105-1 BS 50	22	79	79	180	0	00.00%	88	86	2	2	0	178
142 BS 38	63	411	277	751	0	00.00%	400	324	14	5	0	743
144 BS 57	79	465	273	817	0	00.00%	558	231	14	6	0	809
146 BS 38	65	461	331	857	0	00.00%	504	330	9	3	0	846
148 BS 38	132	641	444	1217	0	00.00%	753	435	17	4	0	1209
150 BS 38	50	419	267	736	0	00.00%	429	291	4	3	0	727
151 BS 38	54	542	413	1009	0	00.00%	725	246	19	8	0	998
152 BS 47	149	1196	665	2010	0	00.00%	1472	481	34	7	0	1994
159 BS 38	58	571	421	1050	0	00.00%	676	321	36	3	0	1036
165 BS 41	43	420	384	847	0	00.00%	596	228	16	3	0	843
166 BS 47	2	2	1	5	0	00.00%	3	2	0	0	0	5
167 BS 47	170	953	514	1637	0	00.00%	1214	386	19	4	0	1623
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	794	262	22	9	0	1087
172 BS 38	14	111	69	194	0	00.00%	133	58	0	0	0	191
192 BS 19	13	99	68	180	0	00.00%	121	53	4	0	0	178
193 BS 47	63	417	364	844	0	00.00%	597	221	16	1	0	835
197 BS 38	18	111	85	214	0	00.00%	146	59	4	2	0	211
218 BS 33	137	675	402	1214	0	00.00%	582	596	12	7	0	1197
219 BS 42	6	115	91	212	0	00.00%	134	73	2	0	0	209
220 BS 34	9	83	46	138	0	00.00%	122	14	0	1	0	137
221 BS 33	87	368	318	773	0	00.00%	528	224	11	0	0	763
223 BS 33	98	460	357	915	0	00.00%	479	412	9	3	0	903
224 BS 33	119	564	415	1098	0	00.00%	518	559	12	3	0	1092
225 BS 35	66	697	429	1192	0	00.00%	908	254	19	1	0	1182
226 BS 35	58	348	281	687	0	00.00%	417	245	12	4	0	678
227 BS 34	82	608	329	1019	0	00.00%	759	210	19	4	0	992
228 BS 34	69	747	417	1233	0	00.00%	939	258	19	6	0	1222
232 BS 33	1	0	0	1	0	00.00%	0	1	0	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	149	31	3	1	0	184
258 BS 34	43	410	304	757	0	00.00%	573	149	11	9	0	742
263 BS 58	93	1140	770	2003	0	00.00%	1494	476	23	3	0	1996
274 BS 33	22	106	198	326	0	00.00%	227	89	3	3	0	322
275 BS 33	27	61	55	143	0	00.00%	109	30	3	0	0	142
276 BS 33	70	381	313	764	0	00.00%	426	313	13	2	0	754
277 BS 34	44	533	262	839	0	00.00%	628	175	14	6	0	823

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Governor

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Greg Abbott	DEM Wendy R. Davis	LIB Kathie Glass	GRN Brandon Parmer	Sarah M. Pavitt	Totals
278 BS 34	64	549	329	942	0	00.00%	686	217	24	5	0	932
279 BS 34	21	201	148	370	0	00.00%	294	62	9	1	0	366
280 BS 35	0	32	16	48	0	00.00%	34	14	0	0	0	48
281 BS 35	2	48	34	84	0	00.00%	63	20	1	0	0	84
283 BS 34	10	75	32	117	0	00.00%	79	34	4	0	0	117
301 BS 50	9	163	125	297	0	00.00%	117	178	0	0	0	295
306 BS 50	130	724	519	1373	0	00.00%	514	804	26	6	0	1350
309 BS 39	11	18	10	39	0	00.00%	25	12	2	0	0	39
311 BS 39	21	109	98	228	0	00.00%	29	190	3	1	0	223
314 BS 39	157	566	484	1207	0	00.00%	230	938	17	4	0	1189
315 BS 50	139	547	425	1111	0	00.00%	322	739	24	10	0	1095
316 BS 39	71	235	235	541	0	00.00%	153	373	4	2	0	532
330 BS 48	48	260	157	465	0	00.00%	136	315	7	6	0	464
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	48	67	1	0	0	116
334 BS 63	37	188	121	346	0	00.00%	44	300	1	1	0	346
336 BS 39	218	763	510	1491	0	00.00%	112	1355	6	4	0	1477
338 BS 50	102	562	368	1032	0	00.00%	373	633	9	5	0	1020
340 BS 19	21	94	45	160	0	00.00%	13	140	2	0	0	155
341 BS 19	23	157	143	323	0	00.00%	172	133	11	4	0	320
343 BS 38	30	213	195	438	0	00.00%	163	251	18	0	0	432
345 BS 39	24	113	98	235	0	00.00%	22	207	2	0	0	231
347 BS 38	44	167	118	329	0	00.00%	79	237	7	0	0	323
389 BS 19	13	108	54	175	0	00.00%	59	116	0	0	0	175
391 BS 19	3	10	11	24	0	00.00%	13	9	1	0	0	23
394 BS 38	0	6	8	14	0	00.00%	7	7	0	0	0	14
398 BS 19	3	67	40	110	0	00.00%	50	57	0	1	0	108
399 BS 19	0	0	1	1	0	00.00%	1	0	0	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	975	405	18	6	0	1404
439-1 BS 52	0	14	1	15	0	00.00%	12	2	1	0	0	15
453 BS 72	140	643	483	1266	0	00.00%	869	349	23	4	0	1245
454 BS 66	109	835	498	1442	0	00.00%	943	450	26	12	0	1431
455 BS 55	0	6	5	11	0	00.00%	7	4	0	0	0	11
456 BS 46	155	937	459	1551	0	00.00%	1216	308	20	3	0	1547
457 BS 46	159	1059	613	1831	0	00.00%	1482	310	21	4	0	1817
460 BS 46	143	1424	679	2246	0	00.00%	1781	420	30	5	0	2236
461 BS 46	60	840	539	1439	0	00.00%	1133	268	28	1	0	1430
462 BS 46	66	884	496	1446	0	00.00%	1157	263	17	1	0	1438
464 BS 55	125	654	388	1167	0	00.00%	847	279	28	6	0	1160

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Governor

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Greg Abbott	DEM Wendy R. Davis	LIB Kathie Glass	GRN Brandon Parmer	Sarah M. Pavitt	Totals
471 BS 46	3	49	14	66	0	00.00%	46	20	0	0	0	66
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1196	500	23	3	0	1722
488 BS 55	38	314	244	596	0	00.00%	444	138	8	2	0	592
490 BS 69	68	504	389	961	0	00.00%	695	246	12	4	0	957
166 BS 57	83	527	423	1033	0	00.00%	716	294	15	2	0	1027
167 BS 57	0	3	0	3	0	00.00%	2	1	0	0	0	3
167 BS 77	28	185	90	303	0	00.00%	205	91	5	1	0	302
219 BS 43	10	51	57	118	0	00.00%	29	84	3	0	0	116
219 BS 44	1	8	8	17	0	00.00%	8	7	1	0	0	16
219 BS 45	10	58	48	116	0	00.00%	52	63	0	0	0	115
220 BS 35	12	124	95	231	0	00.00%	144	81	4	0	0	229
220 BS 53	43	435	402	880	0	00.00%	560	301	9	2	0	872
220 BS 54	0	0	2	2	0	00.00%	0	2	0	0	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	0	0	2
232 BS 37	17	94	86	197	0	00.00%	98	93	3	1	0	195
232 BS 67	7	22	11	40	0	00.00%	16	24	0	0	0	40
232 BS 68	38	240	143	421	0	00.00%	177	234	6	2	0	419
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	217	108	3	0	0	328
283 BS 53	20	297	315	632	0	00.00%	380	237	10	1	0	628
330 BS 49	24	161	127	312	0	00.00%	114	190	4	1	0	309
331 BS 48	8	27	18	53	0	00.00%	18	34	1	0	0	53
331 BS 49	6	7	4	17	0	00.00%	9	7	0	0	0	16
331 BS 65	83	394	232	709	0	00.00%	125	566	3	2	0	696
331 BS 64	0	13	7	20	0	00.00%	9	11	0	0	0	20
399 BS 28	2	10	6	18	0	00.00%	8	8	2	0	0	18
399 BS 31	3	22	14	39	0	00.00%	12	25	0	0	0	37
453 BS 73	1	19	7	27	0	00.00%	18	7	2	0	0	27
454 BS 72	1	4	4	9	0	00.00%	5	4	0	0	0	9
455 BS 56	102	356	234	692	0	00.00%	464	207	13	3	0	687
471 BS 66	21	402	266	689	0	00.00%	457	216	8	1	0	682
482 BS 61	2	9	3	14	0	00.00%	11	2	0	1	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	0	0	28
487 BS 66	1	12	7	20	0	00.00%	14	5	1	0	0	20
488 BS 56	43	439	298	780	0	00.00%	535	219	19	3	0	776
490 BS 70	42	222	193	457	0	00.00%	335	114	3	2	0	454
226 BS 34	3	64	21	88	0	00.00%	77	7	2	1	0	87
Totals	5221	35771	23958	64950	0		40137	22947	985	240	0	64309

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Lieutenant Governor

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Dan Patrick	DEM Leticia Van de Putte	LIB Robert D. Butler	GRN Chandrantha Courtney	Totals
103 BS 39	14	151	83	248	0	00.00%	164	74	8	1	247
103 BS 76	9	59	58	126	0	00.00%	82	32	5	1	120
104 BS 39	10	164	113	287	0	00.00%	188	74	18	3	283
105 BS 39	3	19	13	35	0	00.00%	21	9	5	0	35
105-1 BS 50	22	79	79	180	0	00.00%	90	81	5	1	177
142 BS 38	63	411	277	751	0	00.00%	399	327	16	2	744
144 BS 57	79	465	273	817	0	00.00%	547	236	20	4	807
146 BS 38	65	461	331	857	0	00.00%	505	325	16	3	849
148 BS 38	132	641	444	1217	0	00.00%	732	436	33	6	1207
150 BS 38	50	419	267	736	0	00.00%	426	276	22	2	726
151 BS 38	54	542	413	1009	0	00.00%	713	240	33	10	996
152 BS 47	149	1196	665	2010	0	00.00%	1429	489	56	13	1987
159 BS 38	58	571	421	1050	0	00.00%	677	305	44	10	1036
165 BS 41	43	420	384	847	0	00.00%	592	213	33	5	843
166 BS 47	2	2	1	5	0	00.00%	3	2	0	0	5
167 BS 47	170	953	514	1637	0	00.00%	1185	381	45	11	1622
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	790	253	35	5	1083
172 BS 38	14	111	69	194	0	00.00%	134	53	4	1	192
192 BS 19	13	99	68	180	0	00.00%	121	49	7	0	177
193 BS 47	63	417	364	844	0	00.00%	589	218	28	4	839
197 BS 38	18	111	85	214	0	00.00%	143	57	8	3	211
218 BS 33	137	675	402	1214	0	00.00%	573	573	29	6	1181
219 BS 42	6	115	91	212	0	00.00%	125	76	6	1	208
220 BS 34	9	83	46	138	0	00.00%	119	16	2	0	137
221 BS 33	87	368	318	773	0	00.00%	521	215	21	7	764
223 BS 33	98	460	357	915	0	00.00%	461	401	27	6	895
224 BS 33	119	564	415	1098	0	00.00%	516	537	23	7	1083
225 BS 35	66	697	429	1192	0	00.00%	894	251	30	3	1178
226 BS 35	58	348	281	687	0	00.00%	417	239	19	0	675
227 BS 34	82	608	329	1019	0	00.00%	748	196	34	6	984
228 BS 34	69	747	417	1233	0	00.00%	939	234	34	8	1215
232 BS 33	1	0	0	1	0	00.00%	1	0	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	152	29	4	0	185
258 BS 34	43	410	304	757	0	00.00%	579	137	20	2	738
263 BS 58	93	1140	770	2003	0	00.00%	1463	470	47	10	1990
274 BS 33	22	106	198	326	0	00.00%	229	82	9	5	325
275 BS 33	27	61	55	143	0	00.00%	108	30	5	0	143
276 BS 33	70	381	313	764	0	00.00%	422	300	19	5	746
277 BS 34	44	533	262	839	0	00.00%	639	165	13	4	821

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Lieutenant Governor

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Dan Patrick	DEM Leticia Van de Putte	LIB Robert D. Butler	GRN Chandrantha Courtney	Totals
278 BS 34	64	549	329	942	0	00.00%	680	210	30	5	925
279 BS 34	21	201	148	370	0	00.00%	289	60	16	0	365
280 BS 35	0	32	16	48	0	00.00%	33	15	0	0	48
281 BS 35	2	48	34	84	0	00.00%	61	18	3	0	82
283 BS 34	10	75	32	117	0	00.00%	74	36	6	1	117
301 BS 50	9	163	125	297	0	00.00%	114	170	7	0	291
306 BS 50	130	724	519	1373	0	00.00%	498	789	41	16	1344
309 BS 39	11	18	10	39	0	00.00%	24	8	5	0	37
311 BS 39	21	109	98	228	0	00.00%	30	192	4	0	226
314 BS 39	157	566	484	1207	0	00.00%	235	905	30	9	1179
315 BS 50	139	547	425	1111	0	00.00%	324	718	33	12	1087
316 BS 39	71	235	235	541	0	00.00%	149	367	10	2	528
330 BS 48	48	260	157	465	0	00.00%	145	301	12	3	461
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	46	66	3	2	117
334 BS 63	37	188	121	346	0	00.00%	43	296	4	2	345
336 BS 39	218	763	510	1491	0	00.00%	118	1348	9	1	1476
338 BS 50	102	562	368	1032	0	00.00%	379	616	18	6	1019
340 BS 19	21	94	45	160	0	00.00%	12	143	1	0	156
341 BS 19	23	157	143	323	0	00.00%	165	131	18	2	316
343 BS 38	30	213	195	438	0	00.00%	168	245	16	0	429
345 BS 39	24	113	98	235	0	00.00%	23	208	2	0	233
347 BS 38	44	167	118	329	0	00.00%	84	228	9	1	322
389 BS 19	13	108	54	175	0	00.00%	59	115	0	1	175
391 BS 19	3	10	11	24	0	00.00%	13	9	1	0	23
394 BS 38	0	6	8	14	0	00.00%	7	7	0	0	14
398 BS 19	3	67	40	110	0	00.00%	50	56	2	1	109
399 BS 19	0	0	1	1	0	00.00%	1	0	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	969	397	33	9	1408
439-1 BS 52	0	14	1	15	0	00.00%	12	2	1	0	15
453 BS 72	140	643	483	1266	0	00.00%	859	327	45	8	1239
454 BS 66	109	835	498	1442	0	00.00%	904	452	51	21	1428
455 BS 55	0	6	5	11	0	00.00%	8	2	1	0	11
456 BS 46	155	937	459	1551	0	00.00%	1197	302	31	7	1537
457 BS 46	159	1059	613	1831	0	00.00%	1446	316	41	3	1806
460 BS 46	143	1424	679	2246	0	00.00%	1704	442	72	6	2224
461 BS 46	60	840	539	1439	0	00.00%	1116	265	33	10	1424
462 BS 46	66	884	496	1446	0	00.00%	1109	270	47	3	1429
464 BS 55	125	654	388	1167	0	00.00%	831	273	41	12	1157

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Lieutenant Governor

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Dan Patrick	DEM Leticia Van de Putte	LIB Robert D. Butler	GRN Chandrantha Courtney	Totals
471 BS 46	3	49	14	66	0	00.00%	48	16	0	1	65
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1174	482	54	7	1717
488 BS 55	38	314	244	596	0	00.00%	442	133	12	4	591
490 BS 69	68	504	389	961	0	00.00%	678	233	37	5	953
166 BS 57	83	527	423	1033	0	00.00%	700	277	40	4	1021
167 BS 57	0	3	0	3	0	00.00%	2	1	0	0	3
167 BS 77	28	185	90	303	0	00.00%	206	83	11	2	302
219 BS 43	10	51	57	118	0	00.00%	31	79	4	1	115
219 BS 44	1	8	8	17	0	00.00%	8	9	0	0	17
219 BS 45	10	58	48	116	0	00.00%	59	56	0	0	115
220 BS 35	12	124	95	231	0	00.00%	140	77	13	0	230
220 BS 53	43	435	402	880	0	00.00%	553	286	22	7	868
220 BS 54	0	0	2	2	0	00.00%	0	2	0	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	0	2
232 BS 37	17	94	86	197	0	00.00%	96	86	9	1	192
232 BS 67	7	22	11	40	0	00.00%	18	22	0	0	40
232 BS 68	38	240	143	421	0	00.00%	186	216	12	0	414
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	217	101	4	4	326
283 BS 53	20	297	315	632	0	00.00%	378	217	23	7	625
330 BS 49	24	161	127	312	0	00.00%	120	185	6	0	311
331 BS 48	8	27	18	53	0	00.00%	19	34	0	0	53
331 BS 49	6	7	4	17	0	00.00%	8	8	0	1	17
331 BS 65	83	394	232	709	0	00.00%	122	554	9	8	693
331 BS 64	0	13	7	20	0	00.00%	10	10	0	0	20
399 BS 28	2	10	6	18	0	00.00%	7	9	2	0	18
399 BS 31	3	22	14	39	0	00.00%	12	25	0	0	37
453 BS 73	1	19	7	27	0	00.00%	18	6	3	0	27
454 BS 72	1	4	4	9	0	00.00%	4	5	0	0	9
455 BS 56	102	356	234	692	0	00.00%	447	207	23	6	683
471 BS 66	21	402	266	689	0	00.00%	452	209	15	5	681
482 BS 61	2	9	3	14	0	00.00%	11	3	0	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	0	28
487 BS 66	1	12	7	20	0	00.00%	16	4	0	0	20
488 BS 56	43	439	298	780	0	00.00%	535	202	26	8	771
490 BS 70	42	222	193	457	0	00.00%	327	107	17	5	456
226 BS 34	3	64	21	88	0	00.00%	75	8	3	0	86
Totals	5221	35771	23958	64950	0		39560	22342	1804	374	64080

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Attorney General

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Ken Paxton	DEM Sam Houston	LIB Jamie Balagia	GRN Jamar Osborne	Totals
103 BS 39	14	151	83	248	0	00.00%	159	79	4	2	244
103 BS 76	9	59	58	126	0	00.00%	77	37	3	1	118
104 BS 39	10	164	113	287	0	00.00%	183	76	14	2	275
105 BS 39	3	19	13	35	0	00.00%	23	7	4	1	35
105-1 BS 50	22	79	79	180	0	00.00%	94	74	3	2	173
142 BS 38	63	411	277	751	0	00.00%	396	330	11	2	739
144 BS 57	79	465	273	817	0	00.00%	556	228	18	2	804
146 BS 38	65	461	331	857	0	00.00%	501	322	15	7	845
148 BS 38	132	641	444	1217	0	00.00%	738	434	23	4	1199
150 BS 38	50	419	267	736	0	00.00%	436	271	11	5	723
151 BS 38	54	542	413	1009	0	00.00%	724	239	25	9	997
152 BS 47	149	1196	665	2010	0	00.00%	1483	435	46	9	1973
159 BS 38	58	571	421	1050	0	00.00%	682	313	31	8	1034
165 BS 41	43	420	384	847	0	00.00%	601	204	29	4	838
166 BS 47	2	2	1	5	0	00.00%	3	2	0	0	5
167 BS 47	170	953	514	1637	0	00.00%	1212	356	37	3	1608
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	807	244	28	5	1084
172 BS 38	14	111	69	194	0	00.00%	132	55	0	3	190
192 BS 19	13	99	68	180	0	00.00%	126	51	1	0	178
193 BS 47	63	417	364	844	0	00.00%	602	211	23	2	838
197 BS 38	18	111	85	214	0	00.00%	149	55	4	2	210
218 BS 33	137	675	402	1214	0	00.00%	580	554	31	9	1174
219 BS 42	6	115	91	212	0	00.00%	126	72	9	0	207
220 BS 34	9	83	46	138	0	00.00%	120	14	1	0	135
221 BS 33	87	368	318	773	0	00.00%	544	198	15	8	765
223 BS 33	98	460	357	915	0	00.00%	472	376	21	8	877
224 BS 33	119	564	415	1098	0	00.00%	514	520	29	4	1067
225 BS 35	66	697	429	1192	0	00.00%	897	245	22	5	1169
226 BS 35	58	348	281	687	0	00.00%	396	257	14	1	668
227 BS 34	82	608	329	1019	0	00.00%	742	200	27	2	971
228 BS 34	69	747	417	1233	0	00.00%	949	241	22	5	1217
232 BS 33	1	0	0	1	0	00.00%	0	1	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	154	29	1	0	184
258 BS 34	43	410	304	757	0	00.00%	580	141	9	5	735
263 BS 58	93	1140	770	2003	0	00.00%	1481	443	51	9	1984
274 BS 33	22	106	198	326	0	00.00%	237	72	7	4	320
275 BS 33	27	61	55	143	0	00.00%	108	30	5	0	143
276 BS 33	70	381	313	764	0	00.00%	419	288	22	7	736
277 BS 34	44	533	262	839	0	00.00%	622	179	13	2	816

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Attorney General

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Ken Paxton	DEM Sam Houston	LIB Jamie Balagia	GRN Jamar Osborne	Totals
278 BS 34	64	549	329	942	0	00.00%	682	197	26	7	912
279 BS 34	21	201	148	370	0	00.00%	290	61	11	2	364
280 BS 35	0	32	16	48	0	00.00%	31	14	1	0	46
281 BS 35	2	48	34	84	0	00.00%	63	18	3	0	84
283 BS 34	10	75	32	117	0	00.00%	77	33	5	1	116
301 BS 50	9	163	125	297	0	00.00%	111	172	6	1	290
306 BS 50	130	724	519	1373	0	00.00%	507	749	53	15	1324
309 BS 39	11	18	10	39	0	00.00%	25	10	3	0	38
311 BS 39	21	109	98	228	0	00.00%	30	187	4	1	222
314 BS 39	157	566	484	1207	0	00.00%	235	900	25	11	1171
315 BS 50	139	547	425	1111	0	00.00%	325	713	27	17	1082
316 BS 39	71	235	235	541	0	00.00%	138	369	18	3	528
330 BS 48	48	260	157	465	0	00.00%	137	307	9	6	459
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	47	68	1	1	117
334 BS 63	37	188	121	346	0	00.00%	44	298	1	1	344
336 BS 39	218	763	510	1491	0	00.00%	107	1350	9	7	1473
338 BS 50	102	562	368	1032	0	00.00%	377	628	14	2	1021
340 BS 19	21	94	45	160	0	00.00%	12	141	1	0	154
341 BS 19	23	157	143	323	0	00.00%	167	129	12	3	311
343 BS 38	30	213	195	438	0	00.00%	160	252	12	3	427
345 BS 39	24	113	98	235	0	00.00%	22	209	2	1	234
347 BS 38	44	167	118	329	0	00.00%	81	230	6	4	321
389 BS 19	13	108	54	175	0	00.00%	58	115	0	1	174
391 BS 19	3	10	11	24	0	00.00%	12	10	0	0	22
394 BS 38	0	6	8	14	0	00.00%	7	7	0	0	14
398 BS 19	3	67	40	110	0	00.00%	50	57	2	0	109
399 BS 19	0	0	1	1	0	00.00%	1	0	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	983	383	22	11	1399
439-1 BS 52	0	14	1	15	0	00.00%	13	2	0	0	15
453 BS 72	140	643	483	1266	0	00.00%	868	325	32	12	1237
454 BS 66	109	835	498	1442	0	00.00%	938	420	45	14	1417
455 BS 55	0	6	5	11	0	00.00%	8	2	1	0	11
456 BS 46	155	937	459	1551	0	00.00%	1222	282	24	5	1533
457 BS 46	159	1059	613	1831	0	00.00%	1482	294	29	1	1806
460 BS 46	143	1424	679	2246	0	00.00%	1792	391	41	5	2229
461 BS 46	60	840	539	1439	0	00.00%	1130	251	33	6	1420
462 BS 46	66	884	496	1446	0	00.00%	1166	243	28	2	1439
464 BS 55	125	654	388	1167	0	00.00%	856	260	26	9	1151

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Attorney General

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Ken Paxton	DEM Sam Houston	LIB Jamie Balagia	GRN Jamar Osborne	Totals
471 BS 46	3	49	14	66	0	00.00%	48	16	1	1	66
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1203	457	40	10	1710
488 BS 55	38	314	244	596	0	00.00%	448	126	12	2	588
490 BS 69	68	504	389	961	0	00.00%	690	234	23	4	951
166 BS 57	83	527	423	1033	0	00.00%	716	265	26	11	1018
167 BS 57	0	3	0	3	0	00.00%	2	1	0	0	3
167 BS 77	28	185	90	303	0	00.00%	212	83	5	1	301
219 BS 43	10	51	57	118	0	00.00%	32	79	3	0	114
219 BS 44	1	8	8	17	0	00.00%	9	8	0	0	17
219 BS 45	10	58	48	116	0	00.00%	57	56	1	0	114
220 BS 35	12	124	95	231	0	00.00%	145	78	7	0	230
220 BS 53	43	435	402	880	0	00.00%	558	285	17	5	865
220 BS 54	0	0	2	2	0	00.00%	0	2	0	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	0	2
232 BS 37	17	94	86	197	0	00.00%	92	97	1	2	192
232 BS 67	7	22	11	40	0	00.00%	16	23	1	0	40
232 BS 68	38	240	143	421	0	00.00%	188	216	9	1	414
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	218	99	7	3	327
283 BS 53	20	297	315	632	0	00.00%	399	210	16	3	628
330 BS 49	24	161	127	312	0	00.00%	114	191	6	0	311
331 BS 48	8	27	18	53	0	00.00%	18	35	0	0	53
331 BS 49	6	7	4	17	0	00.00%	10	6	1	0	17
331 BS 65	83	394	232	709	0	00.00%	119	566	6	3	694
331 BS 64	0	13	7	20	0	00.00%	10	9	0	0	19
399 BS 28	2	10	6	18	0	00.00%	9	7	2	0	18
399 BS 31	3	22	14	39	0	00.00%	12	26	0	0	38
453 BS 73	1	19	7	27	0	00.00%	19	6	2	0	27
454 BS 72	1	4	4	9	0	00.00%	4	4	0	0	8
455 BS 56	102	356	234	692	0	00.00%	454	196	20	6	676
471 BS 66	21	402	266	689	0	00.00%	465	201	10	5	681
482 BS 61	2	9	3	14	0	00.00%	13	1	0	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	0	28
487 BS 66	1	12	7	20	0	00.00%	16	4	0	0	20
488 BS 56	43	439	298	780	0	00.00%	546	200	18	3	767
490 BS 70	42	222	193	457	0	00.00%	336	104	10	4	454
226 BS 34	3	64	21	88	0	00.00%	75	9	2	0	86
Totals	5221	35771	23958	64950	0		40158	21864	1407	358	63787

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Comptroller of Public Accounts

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Glenn Hegar	DEM Mike Collier	LIB Ben Sanders	GRN Deb Shaffo	Totals
103 BS 39	14	151	83	248	0	00.00%	157	81	5	1	244
103 BS 76	9	59	58	126	0	00.00%	80	32	4	2	118
104 BS 39	10	164	113	287	0	00.00%	185	79	13	3	280
105 BS 39	3	19	13	35	0	00.00%	22	8	5	0	35
105-1 BS 50	22	79	79	180	0	00.00%	94	73	2	3	172
142 BS 38	63	411	277	751	0	00.00%	373	340	16	6	735
144 BS 57	79	465	273	817	0	00.00%	545	224	26	3	798
146 BS 38	65	461	331	857	0	00.00%	498	313	19	9	839
148 BS 38	132	641	444	1217	0	00.00%	696	451	30	9	1186
150 BS 38	50	419	267	736	0	00.00%	406	294	13	6	719
151 BS 38	54	542	413	1009	0	00.00%	717	229	31	18	995
152 BS 47	149	1196	665	2010	0	00.00%	1439	446	61	16	1962
159 BS 38	58	571	421	1050	0	00.00%	674	302	39	15	1030
165 BS 41	43	420	384	847	0	00.00%	593	201	28	13	835
166 BS 47	2	2	1	5	0	00.00%	3	2	0	0	5
167 BS 47	170	953	514	1637	0	00.00%	1183	360	47	16	1606
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	789	239	45	9	1082
172 BS 38	14	111	69	194	0	00.00%	127	57	2	1	187
192 BS 19	13	99	68	180	0	00.00%	115	57	2	1	175
193 BS 47	63	417	364	844	0	00.00%	590	203	32	6	831
197 BS 38	18	111	85	214	0	00.00%	145	54	7	4	210
218 BS 33	137	675	402	1214	0	00.00%	560	554	33	19	1166
219 BS 42	6	115	91	212	0	00.00%	123	75	6	2	206
220 BS 34	9	83	46	138	0	00.00%	118	15	1	1	135
221 BS 33	87	368	318	773	0	00.00%	521	209	22	10	762
223 BS 33	98	460	357	915	0	00.00%	461	369	31	13	874
224 BS 33	119	564	415	1098	0	00.00%	500	518	32	15	1065
225 BS 35	66	697	429	1192	0	00.00%	879	253	21	11	1164
226 BS 35	58	348	281	687	0	00.00%	397	247	16	8	668
227 BS 34	82	608	329	1019	0	00.00%	719	206	35	8	968
228 BS 34	69	747	417	1233	0	00.00%	912	245	30	13	1200
232 BS 33	1	0	0	1	0	00.00%	1	0	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	150	28	4	1	183
258 BS 34	43	410	304	757	0	00.00%	559	144	23	5	731
263 BS 58	93	1140	770	2003	0	00.00%	1464	453	47	15	1979
274 BS 33	22	106	198	326	0	00.00%	224	78	10	6	318
275 BS 33	27	61	55	143	0	00.00%	110	27	5	1	143
276 BS 33	70	381	313	764	0	00.00%	406	295	21	11	733
277 BS 34	44	533	262	839	0	00.00%	602	177	21	6	806

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Comptroller of Public Accounts

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Glenn Hegar	DEM Mike Collier	LIB Ben Sanders	GRN Deb Shaffo	Totals
278 BS 34	64	549	329	942	0	00.00%	649	202	44	9	904
279 BS 34	21	201	148	370	0	00.00%	286	63	14	1	364
280 BS 35	0	32	16	48	0	00.00%	30	15	1	0	46
281 BS 35	2	48	34	84	0	00.00%	59	18	3	0	80
283 BS 34	10	75	32	117	0	00.00%	78	31	3	3	115
301 BS 50	9	163	125	297	0	00.00%	109	174	4	2	289
306 BS 50	130	724	519	1373	0	00.00%	504	736	50	24	1314
309 BS 39	11	18	10	39	0	00.00%	27	8	3	0	38
311 BS 39	21	109	98	228	0	00.00%	29	188	3	2	222
314 BS 39	157	566	484	1207	0	00.00%	225	887	31	20	1163
315 BS 50	139	547	425	1111	0	00.00%	320	692	38	28	1078
316 BS 39	71	235	235	541	0	00.00%	136	373	11	5	525
330 BS 48	48	260	157	465	0	00.00%	138	309	7	6	460
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	45	68	1	2	116
334 BS 63	37	188	121	346	0	00.00%	39	303	2	1	345
336 BS 39	218	763	510	1491	0	00.00%	108	1349	7	9	1473
338 BS 50	102	562	368	1032	0	00.00%	361	628	23	7	1019
340 BS 19	21	94	45	160	0	00.00%	14	140	1	0	155
341 BS 19	23	157	143	323	0	00.00%	160	135	11	7	313
343 BS 38	30	213	195	438	0	00.00%	152	250	20	9	431
345 BS 39	24	113	98	235	0	00.00%	21	209	3	0	233
347 BS 38	44	167	118	329	0	00.00%	75	235	11	1	322
389 BS 19	13	108	54	175	0	00.00%	58	114	1	1	174
391 BS 19	3	10	11	24	0	00.00%	12	8	0	2	22
394 BS 38	0	6	8	14	0	00.00%	7	5	1	1	14
398 BS 19	3	67	40	110	0	00.00%	48	54	2	4	108
399 BS 19	0	0	1	1	0	00.00%	1	0	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	960	388	35	12	1395
439-1 BS 52	0	14	1	15	0	00.00%	13	2	0	0	15
453 BS 72	140	643	483	1266	0	00.00%	856	312	46	15	1229
454 BS 66	109	835	498	1442	0	00.00%	913	420	44	30	1407
455 BS 55	0	6	5	11	0	00.00%	8	3	0	0	11
456 BS 46	155	937	459	1551	0	00.00%	1211	271	36	13	1531
457 BS 46	159	1059	613	1831	0	00.00%	1464	290	41	5	1800
460 BS 46	143	1424	679	2246	0	00.00%	1761	395	52	11	2219
461 BS 46	60	840	539	1439	0	00.00%	1123	246	42	7	1418
462 BS 46	66	884	496	1446	0	00.00%	1146	247	34	6	1433
464 BS 55	125	654	388	1167	0	00.00%	835	259	35	22	1151

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Comptroller of Public Accounts

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Glenn Hegar	DEM Mike Collier	LIB Ben Sanders	GRN Deb Shaffo	Totals
471 BS 46	3	49	14	66	0	00.00%	43	21	1	1	66
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1192	449	51	10	1702
488 BS 55	38	314	244	596	0	00.00%	435	129	19	2	585
490 BS 69	68	504	389	961	0	00.00%	672	238	28	8	946
166 BS 57	83	527	423	1033	0	00.00%	701	261	40	11	1013
167 BS 57	0	3	0	3	0	00.00%	2	1	0	0	3
167 BS 77	28	185	90	303	0	00.00%	206	90	4	0	300
219 BS 43	10	51	57	118	0	00.00%	28	82	3	0	113
219 BS 44	1	8	8	17	0	00.00%	8	8	1	0	17
219 BS 45	10	58	48	116	0	00.00%	53	57	1	0	111
220 BS 35	12	124	95	231	0	00.00%	141	78	6	1	226
220 BS 53	43	435	402	880	0	00.00%	549	289	17	7	862
220 BS 54	0	0	2	2	0	00.00%	0	2	0	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	0	2
232 BS 37	17	94	86	197	0	00.00%	87	97	7	1	192
232 BS 67	7	22	11	40	0	00.00%	14	25	1	0	40
232 BS 68	38	240	143	421	0	00.00%	179	217	12	2	410
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	211	103	5	3	322
283 BS 53	20	297	315	632	0	00.00%	375	218	31	4	628
330 BS 49	24	161	127	312	0	00.00%	113	185	8	0	306
331 BS 48	8	27	18	53	0	00.00%	17	34	1	0	52
331 BS 49	6	7	4	17	0	00.00%	10	7	0	0	17
331 BS 65	83	394	232	709	0	00.00%	111	573	7	4	695
331 BS 64	0	13	7	20	0	00.00%	10	10	0	0	20
399 BS 28	2	10	6	18	0	00.00%	7	6	3	0	16
399 BS 31	3	22	14	39	0	00.00%	11	26	0	0	37
453 BS 73	1	19	7	27	0	00.00%	18	6	3	0	27
454 BS 72	1	4	4	9	0	00.00%	4	3	0	1	8
455 BS 56	102	356	234	692	0	00.00%	453	193	23	5	674
471 BS 66	21	402	266	689	0	00.00%	456	195	17	8	676
482 BS 61	2	9	3	14	0	00.00%	12	2	0	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	0	28
487 BS 66	1	12	7	20	0	00.00%	15	3	1	0	19
488 BS 56	43	439	298	780	0	00.00%	536	199	27	5	767
490 BS 70	42	222	193	457	0	00.00%	320	112	16	5	453
226 BS 34	3	64	21	88	0	00.00%	73	10	3	0	86
Totals	5221	35771	23958	64950	0		39206	21898	1781	629	63514

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Commissioner of the General Land Office

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP George P. Bush	DEM John Cook	LIB Justin Knight	GRN Valerie Alessi	Totals
103 BS 39	14	151	83	248	0	00.00%	164	73	5	2	244
103 BS 76	9	59	58	126	0	00.00%	81	32	6	2	121
104 BS 39	10	164	113	287	0	00.00%	197	62	14	8	281
105 BS 39	3	19	13	35	0	00.00%	24	8	2	1	35
105-1 BS 50	22	79	79	180	0	00.00%	100	64	7	2	173
142 BS 38	63	411	277	751	0	00.00%	405	319	12	5	741
144 BS 57	79	465	273	817	0	00.00%	543	224	30	5	802
146 BS 38	65	461	331	857	0	00.00%	518	295	21	6	840
148 BS 38	132	641	444	1217	0	00.00%	759	387	31	17	1194
150 BS 38	50	419	267	736	0	00.00%	435	269	16	5	725
151 BS 38	54	542	413	1009	0	00.00%	732	219	35	13	999
152 BS 47	149	1196	665	2010	0	00.00%	1515	387	53	19	1974
159 BS 38	58	571	421	1050	0	00.00%	685	289	43	16	1033
165 BS 41	43	420	384	847	0	00.00%	608	192	32	9	841
166 BS 47	2	2	1	5	0	00.00%	3	2	0	0	5
167 BS 47	170	953	514	1637	0	00.00%	1243	302	42	25	1612
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	803	218	48	12	1081
172 BS 38	14	111	69	194	0	00.00%	133	55	3	0	191
192 BS 19	13	99	68	180	0	00.00%	118	50	7	0	175
193 BS 47	63	417	364	844	0	00.00%	605	190	26	5	826
197 BS 38	18	111	85	214	0	00.00%	151	51	6	3	211
218 BS 33	137	675	402	1214	0	00.00%	627	495	28	24	1174
219 BS 42	6	115	91	212	0	00.00%	129	67	5	2	203
220 BS 34	9	83	46	138	0	00.00%	125	11	0	0	136
221 BS 33	87	368	318	773	0	00.00%	552	192	13	10	767
223 BS 33	98	460	357	915	0	00.00%	515	340	21	15	891
224 BS 33	119	564	415	1098	0	00.00%	563	462	23	22	1070
225 BS 35	66	697	429	1192	0	00.00%	919	213	21	14	1167
226 BS 35	58	348	281	687	0	00.00%	408	233	18	8	667
227 BS 34	82	608	329	1019	0	00.00%	748	188	32	15	983
228 BS 34	69	747	417	1233	0	00.00%	949	227	26	8	1210
232 BS 33	1	0	0	1	0	00.00%	0	1	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	160	21	1	0	182
258 BS 34	43	410	304	757	0	00.00%	576	138	16	9	739
263 BS 58	93	1140	770	2003	0	00.00%	1495	420	49	19	1983
274 BS 33	22	106	198	326	0	00.00%	236	70	8	8	322
275 BS 33	27	61	55	143	0	00.00%	109	26	4	3	142
276 BS 33	70	381	313	764	0	00.00%	443	257	19	23	742
277 BS 34	44	533	262	839	0	00.00%	625	155	32	3	815

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Commissioner of the General Land Office

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP George P. Bush	DEM John Cook	LIB Justin Knight	GRN Valerie Alessi	Totals
278 BS 34	64	549	329	942	0	00.00%	692	181	33	10	916
279 BS 34	21	201	148	370	0	00.00%	291	52	16	5	364
280 BS 35	0	32	16	48	0	00.00%	34	14	0	0	48
281 BS 35	2	48	34	84	0	00.00%	62	18	2	0	82
283 BS 34	10	75	32	117	0	00.00%	76	32	5	2	115
301 BS 50	9	163	125	297	0	00.00%	108	169	6	8	291
306 BS 50	130	724	519	1373	0	00.00%	553	710	39	30	1332
309 BS 39	11	18	10	39	0	00.00%	26	8	3	0	37
311 BS 39	21	109	98	228	0	00.00%	31	185	4	2	222
314 BS 39	157	566	484	1207	0	00.00%	264	865	19	22	1170
315 BS 50	139	547	425	1111	0	00.00%	346	689	26	25	1086
316 BS 39	71	235	235	541	0	00.00%	154	347	18	7	526
330 BS 48	48	260	157	465	0	00.00%	139	303	11	7	460
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	45	68	1	2	116
334 BS 63	37	188	121	346	0	00.00%	40	302	2	0	344
336 BS 39	218	763	510	1491	0	00.00%	114	1344	6	9	1473
338 BS 50	102	562	368	1032	0	00.00%	377	609	21	10	1017
340 BS 19	21	94	45	160	0	00.00%	12	141	1	1	155
341 BS 19	23	157	143	323	0	00.00%	162	132	12	5	311
343 BS 38	30	213	195	438	0	00.00%	168	237	17	6	428
345 BS 39	24	113	98	235	0	00.00%	20	211	4	0	235
347 BS 38	44	167	118	329	0	00.00%	80	227	10	4	321
389 BS 19	13	108	54	175	0	00.00%	59	110	1	2	172
391 BS 19	3	10	11	24	0	00.00%	12	9	1	0	22
394 BS 38	0	6	8	14	0	00.00%	8	5	1	0	14
398 BS 19	3	67	40	110	0	00.00%	53	52	2	3	110
399 BS 19	0	0	1	1	0	00.00%	1	0	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	989	345	46	17	1397
439-1 BS 52	0	14	1	15	0	00.00%	13	2	0	0	15
453 BS 72	140	643	483	1266	0	00.00%	881	285	50	19	1235
454 BS 66	109	835	498	1442	0	00.00%	949	391	46	30	1416
455 BS 55	0	6	5	11	0	00.00%	7	2	2	0	11
456 BS 46	155	937	459	1551	0	00.00%	1260	229	30	12	1531
457 BS 46	159	1059	613	1831	0	00.00%	1500	258	41	7	1806
460 BS 46	143	1424	679	2246	0	00.00%	1827	320	63	18	2228
461 BS 46	60	840	539	1439	0	00.00%	1136	219	44	19	1418
462 BS 46	66	884	496	1446	0	00.00%	1176	219	37	5	1437
464 BS 55	125	654	388	1167	0	00.00%	875	218	35	25	1153

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Commissioner of the General Land Office

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP George P. Bush	DEM John Cook	LIB Justin Knight	GRN Valerie Alessi	Totals
471 BS 46	3	49	14	66	0	00.00%	46	18	2	0	66
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1198	428	62	13	1701
488 BS 55	38	314	244	596	0	00.00%	439	116	19	7	581
490 BS 69	68	504	389	961	0	00.00%	688	215	33	9	945
166 BS 57	83	527	423	1033	0	00.00%	738	226	35	13	1012
167 BS 57	0	3	0	3	0	00.00%	2	1	0	0	3
167 BS 77	28	185	90	303	0	00.00%	215	70	10	4	299
219 BS 43	10	51	57	118	0	00.00%	29	81	3	1	114
219 BS 44	1	8	8	17	0	00.00%	9	7	0	1	17
219 BS 45	10	58	48	116	0	00.00%	57	54	3	1	115
220 BS 35	12	124	95	231	0	00.00%	151	69	7	2	229
220 BS 53	43	435	402	880	0	00.00%	557	268	26	11	862
220 BS 54	0	0	2	2	0	00.00%	0	2	0	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	0	2
232 BS 37	17	94	86	197	0	00.00%	94	92	3	4	193
232 BS 67	7	22	11	40	0	00.00%	16	23	1	0	40
232 BS 68	38	240	143	421	0	00.00%	192	208	9	5	414
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	226	92	6	3	327
283 BS 53	20	297	315	632	0	00.00%	385	202	28	9	624
330 BS 49	24	161	127	312	0	00.00%	122	180	8	1	311
331 BS 48	8	27	18	53	0	00.00%	20	32	1	0	53
331 BS 49	6	7	4	17	0	00.00%	9	8	0	0	17
331 BS 65	83	394	232	709	0	00.00%	121	559	7	6	693
331 BS 64	0	13	7	20	0	00.00%	11	9	0	0	20
399 BS 28	2	10	6	18	0	00.00%	9	7	1	0	17
399 BS 31	3	22	14	39	0	00.00%	11	26	0	0	37
453 BS 73	1	19	7	27	0	00.00%	18	6	2	1	27
454 BS 72	1	4	4	9	0	00.00%	5	3	0	1	9
455 BS 56	102	356	234	692	0	00.00%	468	181	15	11	675
471 BS 66	21	402	266	689	0	00.00%	479	172	17	10	678
482 BS 61	2	9	3	14	0	00.00%	12	2	0	0	14
482 BS 62	6	16	6	28	0	00.00%	23	4	1	0	28
487 BS 66	1	12	7	20	0	00.00%	16	3	0	0	19
488 BS 56	43	439	298	780	0	00.00%	550	182	24	6	762
490 BS 70	42	222	193	457	0	00.00%	325	101	20	4	450
226 BS 34	3	64	21	88	0	00.00%	74	7	5	0	86
Totals	5221	35771	23958	64950	0		40858	20366	1758	773	63755

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Commissioner of Agriculture

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Sid Miller	DEM Jim Hogan	LIB David (Rocky) Palmquist	GRN Kenneth Kendrick	Totals
103 BS 39	14	151	83	248	0	00.00%	166	64	7	5	242
103 BS 76	9	59	58	126	0	00.00%	75	37	7	1	120
104 BS 39	10	164	113	287	0	00.00%	187	72	13	5	277
105 BS 39	3	19	13	35	0	00.00%	21	9	4	1	35
105-1 BS 50	22	79	79	180	0	00.00%	87	72	4	2	165
142 BS 38	63	411	277	751	0	00.00%	377	331	12	10	730
144 BS 57	79	465	273	817	0	00.00%	539	221	20	11	791
146 BS 38	65	461	331	857	0	00.00%	480	308	23	16	827
148 BS 38	132	641	444	1217	0	00.00%	710	429	25	11	1175
150 BS 38	50	419	267	736	0	00.00%	419	276	15	8	718
151 BS 38	54	542	413	1009	0	00.00%	717	221	33	21	992
152 BS 47	149	1196	665	2010	0	00.00%	1451	408	68	17	1944
159 BS 38	58	571	421	1050	0	00.00%	668	303	41	19	1031
165 BS 41	43	420	384	847	0	00.00%	590	192	29	17	828
166 BS 47	2	2	1	5	0	00.00%	3	2	0	0	5
167 BS 47	170	953	514	1637	0	00.00%	1201	323	51	24	1599
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	774	233	46	21	1074
172 BS 38	14	111	69	194	0	00.00%	127	57	4	1	189
192 BS 19	13	99	68	180	0	00.00%	116	53	3	2	174
193 BS 47	63	417	364	844	0	00.00%	585	189	35	9	818
197 BS 38	18	111	85	214	0	00.00%	145	53	4	5	207
218 BS 33	137	675	402	1214	0	00.00%	542	551	37	21	1151
219 BS 42	6	115	91	212	0	00.00%	124	65	10	2	201
220 BS 34	9	83	46	138	0	00.00%	118	15	1	1	135
221 BS 33	87	368	318	773	0	00.00%	518	192	21	22	753
223 BS 33	98	460	357	915	0	00.00%	451	362	29	19	861
224 BS 33	119	564	415	1098	0	00.00%	499	497	35	16	1047
225 BS 35	66	697	429	1192	0	00.00%	881	233	21	19	1154
226 BS 35	58	348	281	687	0	00.00%	390	250	18	6	664
227 BS 34	82	608	329	1019	0	00.00%	704	206	32	14	956
228 BS 34	69	747	417	1233	0	00.00%	906	237	32	12	1187
232 BS 33	1	0	0	1	0	00.00%	1	0	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	149	29	5	0	183
258 BS 34	43	410	304	757	0	00.00%	548	156	20	8	732
263 BS 58	93	1140	770	2003	0	00.00%	1474	417	53	29	1973
274 BS 33	22	106	198	326	0	00.00%	232	71	9	8	320
275 BS 33	27	61	55	143	0	00.00%	108	30	4	1	143
276 BS 33	70	381	313	764	0	00.00%	403	272	26	18	719
277 BS 34	44	533	262	839	0	00.00%	601	181	21	5	808

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Commissioner of Agriculture

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Sid Miller	DEM Jim Hogan	LIB David (Rocky) Palmquist	GRN Kenneth Kendrick	Totals
278 BS 34	64	549	329	942	0	00.00%	656	203	34	12	905
279 BS 34	21	201	148	370	0	00.00%	286	55	16	4	361
280 BS 35	0	32	16	48	0	00.00%	31	15	0	0	46
281 BS 35	2	48	34	84	0	00.00%	60	18	4	0	82
283 BS 34	10	75	32	117	0	00.00%	77	34	1	2	114
301 BS 50	9	163	125	297	0	00.00%	107	175	5	4	291
306 BS 50	130	724	519	1373	0	00.00%	501	723	54	37	1315
309 BS 39	11	18	10	39	0	00.00%	23	10	3	1	37
311 BS 39	21	109	98	228	0	00.00%	30	188	2	2	222
314 BS 39	157	566	484	1207	0	00.00%	225	885	29	23	1162
315 BS 50	139	547	425	1111	0	00.00%	308	697	30	40	1075
316 BS 39	71	235	235	541	0	00.00%	135	366	13	6	520
330 BS 48	48	260	157	465	0	00.00%	133	305	10	9	457
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	46	66	3	1	116
334 BS 63	37	188	121	346	0	00.00%	38	303	2	0	343
336 BS 39	218	763	510	1491	0	00.00%	99	1354	6	11	1470
338 BS 50	102	562	368	1032	0	00.00%	356	618	21	13	1008
340 BS 19	21	94	45	160	0	00.00%	11	140	2	1	154
341 BS 19	23	157	143	323	0	00.00%	156	133	13	10	312
343 BS 38	30	213	195	438	0	00.00%	152	246	21	6	425
345 BS 39	24	113	98	235	0	00.00%	21	210	2	2	235
347 BS 38	44	167	118	329	0	00.00%	75	233	11	3	322
389 BS 19	13	108	54	175	0	00.00%	57	112	1	2	172
391 BS 19	3	10	11	24	0	00.00%	11	9	2	0	22
394 BS 38	0	6	8	14	0	00.00%	7	7	0	0	14
398 BS 19	3	67	40	110	0	00.00%	49	54	4	1	108
399 BS 19	0	0	1	1	0	00.00%	1	0	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	960	358	35	32	1385
439-1 BS 52	0	14	1	15	0	00.00%	12	2	1	0	15
453 BS 72	140	643	483	1266	0	00.00%	844	306	43	32	1225
454 BS 66	109	835	498	1442	0	00.00%	909	412	44	34	1399
455 BS 55	0	6	5	11	0	00.00%	7	3	1	0	11
456 BS 46	155	937	459	1551	0	00.00%	1238	229	33	17	1517
457 BS 46	159	1059	613	1831	0	00.00%	1478	259	39	12	1788
460 BS 46	143	1424	679	2246	0	00.00%	1784	349	59	16	2208
461 BS 46	60	840	539	1439	0	00.00%	1136	212	40	24	1412
462 BS 46	66	884	496	1446	0	00.00%	1172	213	32	10	1427
464 BS 55	125	654	388	1167	0	00.00%	847	239	40	20	1146

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Commissioner of Agriculture

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Sid Miller	DEM Jim Hogan	LIB David (Rocky) Palmquist	GRN Kenneth Kendrick	Totals
471 BS 46	3	49	14	66	0	00.00%	46	20	0	0	66
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1170	440	58	24	1692
488 BS 55	38	314	244	596	0	00.00%	437	123	12	10	582
490 BS 69	68	504	389	961	0	00.00%	674	218	29	15	936
166 BS 57	83	527	423	1033	0	00.00%	704	245	41	15	1005
167 BS 57	0	3	0	3	0	00.00%	2	1	0	0	3
167 BS 77	28	185	90	303	0	00.00%	205	79	7	6	297
219 BS 43	10	51	57	118	0	00.00%	26	81	5	1	113
219 BS 44	1	8	8	17	0	00.00%	8	8	1	0	17
219 BS 45	10	58	48	116	0	00.00%	56	54	3	1	114
220 BS 35	12	124	95	231	0	00.00%	144	74	6	4	228
220 BS 53	43	435	402	880	0	00.00%	543	283	21	9	856
220 BS 54	0	0	2	2	0	00.00%	0	2	0	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	0	2
232 BS 37	17	94	86	197	0	00.00%	89	98	3	2	192
232 BS 67	7	22	11	40	0	00.00%	13	23	3	1	40
232 BS 68	38	240	143	421	0	00.00%	176	214	11	8	409
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	217	93	7	3	320
283 BS 53	20	297	315	632	0	00.00%	373	205	24	16	618
330 BS 49	24	161	127	312	0	00.00%	111	187	8	0	306
331 BS 48	8	27	18	53	0	00.00%	19	32	0	1	52
331 BS 49	6	7	4	17	0	00.00%	9	8	0	0	17
331 BS 65	83	394	232	709	0	00.00%	108	572	7	5	692
331 BS 64	0	13	7	20	0	00.00%	9	9	1	0	19
399 BS 28	2	10	6	18	0	00.00%	8	6	2	1	17
399 BS 31	3	22	14	39	0	00.00%	11	26	0	0	37
453 BS 73	1	19	7	27	0	00.00%	19	6	2	0	27
454 BS 72	1	4	4	9	0	00.00%	4	3	0	1	8
455 BS 56	102	356	234	692	0	00.00%	445	195	18	11	669
471 BS 66	21	402	266	689	0	00.00%	463	182	17	10	672
482 BS 61	2	9	3	14	0	00.00%	12	2	0	0	14
482 BS 62	6	16	6	28	0	00.00%	23	4	1	0	28
487 BS 66	1	12	7	20	0	00.00%	13	3	2	1	19
488 BS 56	43	439	298	780	0	00.00%	543	187	24	11	765
490 BS 70	42	222	193	457	0	00.00%	317	105	17	9	448
226 BS 34	3	64	21	88	0	00.00%	72	8	4	1	85
Totals	5221	35771	23958	64950	0		39196	21154	1808	960	63118

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Railroad Commissioner

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Ryan Sitton	DEM Steve Brown	LIB Mark A. Miller	GRN Martina Salinas	Totals
103 BS 39	14	151	83	248	0	00.00%	157	73	9	3	242
103 BS 76	9	59	58	126	0	00.00%	75	34	7	1	117
104 BS 39	10	164	113	287	0	00.00%	188	66	16	7	277
105 BS 39	3	19	13	35	0	00.00%	22	9	4	0	35
105-1 BS 50	22	79	79	180	0	00.00%	87	73	4	2	166
142 BS 38	63	411	277	751	0	00.00%	380	319	17	13	729
144 BS 57	79	465	273	817	0	00.00%	543	215	24	8	790
146 BS 38	65	461	331	857	0	00.00%	487	306	19	17	829
148 BS 38	132	641	444	1217	0	00.00%	712	414	39	17	1182
150 BS 38	50	419	267	736	0	00.00%	424	268	17	7	716
151 BS 38	54	542	413	1009	0	00.00%	714	230	31	15	990
152 BS 47	149	1196	665	2010	0	00.00%	1475	398	57	22	1952
159 BS 38	58	571	421	1050	0	00.00%	669	296	41	23	1029
165 BS 41	43	420	384	847	0	00.00%	590	187	45	5	827
166 BS 47	2	2	1	5	0	00.00%	3	2	0	0	5
167 BS 47	170	953	514	1637	0	00.00%	1214	322	45	19	1600
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	797	229	40	14	1080
172 BS 38	14	111	69	194	0	00.00%	129	55	4	1	189
192 BS 19	13	99	68	180	0	00.00%	114	52	6	3	175
193 BS 47	63	417	364	844	0	00.00%	601	186	24	7	818
197 BS 38	18	111	85	214	0	00.00%	146	51	5	6	208
218 BS 33	137	675	402	1214	0	00.00%	544	543	39	27	1153
219 BS 42	6	115	91	212	0	00.00%	127	67	6	4	204
220 BS 34	9	83	46	138	0	00.00%	118	15	2	0	135
221 BS 33	87	368	318	773	0	00.00%	523	190	24	20	757
223 BS 33	98	460	357	915	0	00.00%	449	359	30	24	862
224 BS 33	119	564	415	1098	0	00.00%	507	486	32	27	1052
225 BS 35	66	697	429	1192	0	00.00%	897	224	26	16	1163
226 BS 35	58	348	281	687	0	00.00%	396	247	21	3	667
227 BS 34	82	608	329	1019	0	00.00%	717	192	35	11	955
228 BS 34	69	747	417	1233	0	00.00%	927	226	30	13	1196
232 BS 33	1	0	0	1	0	00.00%	1	0	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	156	23	2	1	182
258 BS 34	43	410	304	757	0	00.00%	552	149	22	7	730
263 BS 58	93	1140	770	2003	0	00.00%	1477	420	51	28	1976
274 BS 33	22	106	198	326	0	00.00%	224	70	16	8	318
275 BS 33	27	61	55	143	0	00.00%	108	27	4	3	142
276 BS 33	70	381	313	764	0	00.00%	402	277	26	19	724
277 BS 34	44	533	262	839	0	00.00%	607	169	25	6	807

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Railroad Commissioner

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Ryan Sitton	DEM Steve Brown	LIB Mark A. Miller	GRN Martina Salinas	Totals
278 BS 34	64	549	329	942	0	00.00%	671	191	31	15	908
279 BS 34	21	201	148	370	0	00.00%	287	55	18	3	363
280 BS 35	0	32	16	48	0	00.00%	32	15	0	0	47
281 BS 35	2	48	34	84	0	00.00%	58	17	5	1	81
283 BS 34	10	75	32	117	0	00.00%	77	31	3	4	115
301 BS 50	9	163	125	297	0	00.00%	103	173	7	7	290
306 BS 50	130	724	519	1373	0	00.00%	499	723	46	42	1310
309 BS 39	11	18	10	39	0	00.00%	24	10	2	1	37
311 BS 39	21	109	98	228	0	00.00%	29	187	4	4	224
314 BS 39	157	566	484	1207	0	00.00%	225	879	35	22	1161
315 BS 50	139	547	425	1111	0	00.00%	307	689	37	39	1072
316 BS 39	71	235	235	541	0	00.00%	127	365	13	20	525
330 BS 48	48	260	157	465	0	00.00%	125	314	11	9	459
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	46	66	2	2	116
334 BS 63	37	188	121	346	0	00.00%	39	301	3	1	344
336 BS 39	218	763	510	1491	0	00.00%	102	1350	6	15	1473
338 BS 50	102	562	368	1032	0	00.00%	360	618	20	13	1011
340 BS 19	21	94	45	160	0	00.00%	11	143	1	1	156
341 BS 19	23	157	143	323	0	00.00%	157	129	17	9	312
343 BS 38	30	213	195	438	0	00.00%	151	236	25	13	425
345 BS 39	24	113	98	235	0	00.00%	20	209	3	3	235
347 BS 38	44	167	118	329	0	00.00%	74	232	8	7	321
389 BS 19	13	108	54	175	0	00.00%	59	113	0	1	173
391 BS 19	3	10	11	24	0	00.00%	14	8	0	1	23
394 BS 38	0	6	8	14	0	00.00%	7	5	2	0	14
398 BS 19	3	67	40	110	0	00.00%	48	55	5	2	110
399 BS 19	0	0	1	1	0	00.00%	1	0	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	969	362	40	18	1389
439-1 BS 52	0	14	1	15	0	00.00%	13	2	0	0	15
453 BS 72	140	643	483	1266	0	00.00%	864	289	46	25	1224
454 BS 66	109	835	498	1442	0	00.00%	917	404	47	36	1404
455 BS 55	0	6	5	11	0	00.00%	8	2	1	0	11
456 BS 46	155	937	459	1551	0	00.00%	1237	230	44	14	1525
457 BS 46	159	1059	613	1831	0	00.00%	1484	259	42	12	1797
460 BS 46	143	1424	679	2246	0	00.00%	1808	335	54	18	2215
461 BS 46	60	840	539	1439	0	00.00%	1134	219	44	13	1410
462 BS 46	66	884	496	1446	0	00.00%	1165	219	38	8	1430
464 BS 55	125	654	388	1167	0	00.00%	849	232	45	21	1147

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Railroad Commissioner

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Ryan Sitton	DEM Steve Brown	LIB Mark A. Miller	GRN Martina Salinas	Totals
471 BS 46	3	49	14	66	0	00.00%	47	18	1	0	66
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1176	433	61	24	1694
488 BS 55	38	314	244	596	0	00.00%	442	123	12	6	583
490 BS 69	68	504	389	961	0	00.00%	679	227	28	6	940
166 BS 57	83	527	423	1033	0	00.00%	710	241	40	22	1013
167 BS 57	0	3	0	3	0	00.00%	2	1	0	0	3
167 BS 77	28	185	90	303	0	00.00%	204	84	6	3	297
219 BS 43	10	51	57	118	0	00.00%	27	83	3	1	114
219 BS 44	1	8	8	17	0	00.00%	8	7	1	1	17
219 BS 45	10	58	48	116	0	00.00%	53	58	0	2	113
220 BS 35	12	124	95	231	0	00.00%	147	72	5	3	227
220 BS 53	43	435	402	880	0	00.00%	546	273	24	10	853
220 BS 54	0	0	2	2	0	00.00%	0	2	0	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	0	2
232 BS 37	17	94	86	197	0	00.00%	90	96	5	1	192
232 BS 67	7	22	11	40	0	00.00%	14	24	2	0	40
232 BS 68	38	240	143	421	0	00.00%	181	212	11	6	410
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	213	95	6	5	319
283 BS 53	20	297	315	632	0	00.00%	376	211	25	9	621
330 BS 49	24	161	127	312	0	00.00%	115	183	11	1	310
331 BS 48	8	27	18	53	0	00.00%	17	34	1	0	52
331 BS 49	6	7	4	17	0	00.00%	8	7	1	1	17
331 BS 65	83	394	232	709	0	00.00%	109	567	7	9	692
331 BS 64	0	13	7	20	0	00.00%	10	10	0	0	20
399 BS 28	2	10	6	18	0	00.00%	7	6	2	2	17
399 BS 31	3	22	14	39	0	00.00%	11	26	0	0	37
453 BS 73	1	19	7	27	0	00.00%	19	6	2	0	27
454 BS 72	1	4	4	9	0	00.00%	4	3	0	1	8
455 BS 56	102	356	234	692	0	00.00%	451	186	19	14	670
471 BS 66	21	402	266	689	0	00.00%	461	189	18	7	675
482 BS 61	2	9	3	14	0	00.00%	12	2	0	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	0	28
487 BS 66	1	12	7	20	0	00.00%	15	3	1	0	19
488 BS 56	43	439	298	780	0	00.00%	539	189	25	10	763
490 BS 70	42	222	193	457	0	00.00%	329	91	24	8	452
226 BS 34	3	64	21	88	0	00.00%	73	7	4	1	85
Totals	5221	35771	23958	64950	0		39481	20909	1895	960	63245

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Chief Justice, Supreme Court

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Nathan Hecht	DEM William Moody	LIB Tom Oxford	Totals
103 BS 39	14	151	83	248	0	00.00%	159	73	8	240
103 BS 76	9	59	58	126	0	00.00%	78	35	4	117
104 BS 39	10	164	113	287	0	00.00%	180	80	16	276
105 BS 39	3	19	13	35	0	00.00%	20	10	4	34
105-1 BS 50	22	79	79	180	0	00.00%	95	73	2	170
142 BS 38	63	411	277	751	0	00.00%	380	334	13	727
144 BS 57	79	465	273	817	0	00.00%	538	230	25	793
146 BS 38	65	461	331	857	0	00.00%	500	308	21	829
148 BS 38	132	641	444	1217	0	00.00%	714	440	29	1183
150 BS 38	50	419	267	736	0	00.00%	431	270	18	719
151 BS 38	54	542	413	1009	0	00.00%	718	238	33	989
152 BS 47	149	1196	665	2010	0	00.00%	1479	408	68	1955
159 BS 38	58	571	421	1050	0	00.00%	680	306	43	1029
165 BS 41	43	420	384	847	0	00.00%	597	200	37	834
166 BS 47	2	2	1	5	0	00.00%	3	2	0	5
167 BS 47	170	953	514	1637	0	00.00%	1213	340	53	1606
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	798	237	42	1077
172 BS 38	14	111	69	194	0	00.00%	128	59	2	189
192 BS 19	13	99	68	180	0	00.00%	117	54	3	174
193 BS 47	63	417	364	844	0	00.00%	591	199	29	819
197 BS 38	18	111	85	214	0	00.00%	145	55	6	206
218 BS 33	137	675	402	1214	0	00.00%	566	563	33	1162
219 BS 42	6	115	91	212	0	00.00%	124	72	7	203
220 BS 34	9	83	46	138	0	00.00%	121	12	2	135
221 BS 33	87	368	318	773	0	00.00%	518	214	22	754
223 BS 33	98	460	357	915	0	00.00%	450	385	28	863
224 BS 33	119	564	415	1098	0	00.00%	510	519	29	1058
225 BS 35	66	697	429	1192	0	00.00%	891	244	32	1167
226 BS 35	58	348	281	687	0	00.00%	396	258	13	667
227 BS 34	82	608	329	1019	0	00.00%	717	201	37	955
228 BS 34	69	747	417	1233	0	00.00%	908	253	33	1194
232 BS 33	1	0	0	1	0	00.00%	1	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	151	29	3	183
258 BS 34	43	410	304	757	0	00.00%	552	157	18	727
263 BS 58	93	1140	770	2003	0	00.00%	1480	441	60	1981
274 BS 33	22	106	198	326	0	00.00%	231	74	12	317
275 BS 33	27	61	55	143	0	00.00%	105	31	5	141
276 BS 33	70	381	313	764	0	00.00%	406	293	26	725
277 BS 34	44	533	262	839	0	00.00%	609	181	21	811

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Chief Justice, Supreme Court

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Nathan Hecht	DEM William Moody	LIB Tom Oxford	Totals
278 BS 34	64	549	329	942	0	00.00%	654	210	35	899
279 BS 34	21	201	148	370	0	00.00%	290	56	17	363
280 BS 35	0	32	16	48	0	00.00%	31	15	0	46
281 BS 35	2	48	34	84	0	00.00%	62	17	3	82
283 BS 34	10	75	32	117	0	00.00%	73	36	4	113
301 BS 50	9	163	125	297	0	00.00%	109	177	5	291
306 BS 50	130	724	519	1373	0	00.00%	510	756	61	1327
309 BS 39	11	18	10	39	0	00.00%	22	12	3	37
311 BS 39	21	109	98	228	0	00.00%	31	186	3	220
314 BS 39	157	566	484	1207	0	00.00%	222	908	38	1168
315 BS 50	139	547	425	1111	0	00.00%	303	723	45	1071
316 BS 39	71	235	235	541	0	00.00%	136	378	10	524
330 BS 48	48	260	157	465	0	00.00%	139	307	11	457
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	47	68	1	116
334 BS 63	37	188	121	346	0	00.00%	41	300	3	344
336 BS 39	218	763	510	1491	0	00.00%	104	1354	10	1468
338 BS 50	102	562	368	1032	0	00.00%	365	632	15	1012
340 BS 19	21	94	45	160	0	00.00%	11	143	1	155
341 BS 19	23	157	143	323	0	00.00%	160	133	16	309
343 BS 38	30	213	195	438	0	00.00%	160	246	20	426
345 BS 39	24	113	98	235	0	00.00%	20	213	2	235
347 BS 38	44	167	118	329	0	00.00%	76	234	10	320
389 BS 19	13	108	54	175	0	00.00%	58	114	2	174
391 BS 19	3	10	11	24	0	00.00%	13	9	0	22
394 BS 38	0	6	8	14	0	00.00%	8	5	1	14
398 BS 19	3	67	40	110	0	00.00%	53	55	1	109
399 BS 19	0	0	1	1	0	00.00%	1	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	974	368	42	1384
439-1 BS 52	0	14	1	15	0	00.00%	13	2	0	15
453 BS 72	140	643	483	1266	0	00.00%	868	312	44	1224
454 BS 66	109	835	498	1442	0	00.00%	926	427	52	1405
455 BS 55	0	6	5	11	0	00.00%	8	2	1	11
456 BS 46	155	937	459	1551	0	00.00%	1245	243	39	1527
457 BS 46	159	1059	613	1831	0	00.00%	1479	270	46	1795
460 BS 46	143	1424	679	2246	0	00.00%	1793	369	52	2214
461 BS 46	60	840	539	1439	0	00.00%	1133	233	47	1413
462 BS 46	66	884	496	1446	0	00.00%	1168	231	31	1430
464 BS 55	125	654	388	1167	0	00.00%	852	243	45	1140

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Chief Justice, Supreme Court

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Nathan Hecht	DEM William Moody	LIB Tom Oxford	Totals
471 BS 46	3	49	14	66	0	00.00%	44	19	1	64
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1177	464	59	1700
488 BS 55	38	314	244	596	0	00.00%	446	122	17	585
490 BS 69	68	504	389	961	0	00.00%	668	240	35	943
166 BS 57	83	527	423	1033	0	00.00%	715	247	44	1006
167 BS 57	0	3	0	3	0	00.00%	2	1	0	3
167 BS 77	28	185	90	303	0	00.00%	209	80	8	297
219 BS 43	10	51	57	118	0	00.00%	28	82	3	113
219 BS 44	1	8	8	17	0	00.00%	9	7	1	17
219 BS 45	10	58	48	116	0	00.00%	53	58	2	113
220 BS 35	12	124	95	231	0	00.00%	149	75	3	227
220 BS 53	43	435	402	880	0	00.00%	553	283	22	858
220 BS 54	0	0	2	2	0	00.00%	0	2	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	2
232 BS 37	17	94	86	197	0	00.00%	92	94	4	190
232 BS 67	7	22	11	40	0	00.00%	16	23	1	40
232 BS 68	38	240	143	421	0	00.00%	182	214	14	410
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	218	93	10	321
283 BS 53	20	297	315	632	0	00.00%	381	216	24	621
330 BS 49	24	161	127	312	0	00.00%	114	187	7	308
331 BS 48	8	27	18	53	0	00.00%	19	33	0	52
331 BS 49	6	7	4	17	0	00.00%	10	7	0	17
331 BS 65	83	394	232	709	0	00.00%	111	574	6	691
331 BS 64	0	13	7	20	0	00.00%	9	10	0	19
399 BS 28	2	10	6	18	0	00.00%	7	7	4	18
399 BS 31	3	22	14	39	0	00.00%	11	26	0	37
453 BS 73	1	19	7	27	0	00.00%	19	6	2	27
454 BS 72	1	4	4	9	0	00.00%	5	3	0	8
455 BS 56	102	356	234	692	0	00.00%	449	193	27	669
471 BS 66	21	402	266	689	0	00.00%	468	190	19	677
482 BS 61	2	9	3	14	0	00.00%	12	2	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	28
487 BS 66	1	12	7	20	0	00.00%	14	3	2	19
488 BS 56	43	439	298	780	0	00.00%	543	193	26	762
490 BS 70	42	222	193	457	0	00.00%	326	104	21	451
226 BS 34	3	64	21	88	0	00.00%	72	10	3	85
Totals	5221	35771	23958	64950	0		39615	21737	1918	63270

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, Supreme Court, Place 6, Unexpired Term

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jeff Brown	DEM Lawrence Edward Meyers	LIB Mark Ash	Totals
103 BS 39	14	151	83	248	0	00.00%	159	74	5	238
103 BS 76	9	59	58	126	0	00.00%	82	30	6	118
104 BS 39	10	164	113	287	0	00.00%	191	70	16	277
105 BS 39	3	19	13	35	0	00.00%	21	11	3	35
105-1 BS 50	22	79	79	180	0	00.00%	93	70	5	168
142 BS 38	63	411	277	751	0	00.00%	399	310	21	730
144 BS 57	79	465	273	817	0	00.00%	550	219	26	795
146 BS 38	65	461	331	857	0	00.00%	496	311	21	828
148 BS 38	132	641	444	1217	0	00.00%	742	403	32	1177
150 BS 38	50	419	267	736	0	00.00%	431	270	18	719
151 BS 38	54	542	413	1009	0	00.00%	724	225	39	988
152 BS 47	149	1196	665	2010	0	00.00%	1485	393	74	1952
159 BS 38	58	571	421	1050	0	00.00%	698	284	47	1029
165 BS 41	43	420	384	847	0	00.00%	604	196	33	833
166 BS 47	2	2	1	5	0	00.00%	3	2	0	5
167 BS 47	170	953	514	1637	0	00.00%	1219	327	50	1596
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	806	224	48	1078
172 BS 38	14	111	69	194	0	00.00%	131	57	0	188
192 BS 19	13	99	68	180	0	00.00%	119	50	5	174
193 BS 47	63	417	364	844	0	00.00%	594	189	36	819
197 BS 38	18	111	85	214	0	00.00%	146	54	7	207
218 BS 33	137	675	402	1214	0	00.00%	600	521	31	1152
219 BS 42	6	115	91	212	0	00.00%	125	72	6	203
220 BS 34	9	83	46	138	0	00.00%	121	13	1	135
221 BS 33	87	368	318	773	0	00.00%	537	187	29	753
223 BS 33	98	460	357	915	0	00.00%	472	352	34	858
224 BS 33	119	564	415	1098	0	00.00%	526	483	37	1046
225 BS 35	66	697	429	1192	0	00.00%	904	229	29	1162
226 BS 35	58	348	281	687	0	00.00%	407	236	17	660
227 BS 34	82	608	329	1019	0	00.00%	729	186	38	953
228 BS 34	69	747	417	1233	0	00.00%	933	223	37	1193
232 BS 33	1	0	0	1	0	00.00%	1	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	153	25	3	181
258 BS 34	43	410	304	757	0	00.00%	562	141	25	728
263 BS 58	93	1140	770	2003	0	00.00%	1489	427	61	1977
274 BS 33	22	106	198	326	0	00.00%	234	71	12	317
275 BS 33	27	61	55	143	0	00.00%	109	27	4	140
276 BS 33	70	381	313	764	0	00.00%	418	270	30	718
277 BS 34	44	533	262	839	0	00.00%	623	163	20	806

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, Supreme Court, Place 6, Unexpired Term

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jeff Brown	DEM Lawrence Edward Meyers	LIB Mark Ash	Totals
278 BS 34	64	549	329	942	0	00.00%	677	182	40	899
279 BS 34	21	201	148	370	0	00.00%	291	53	18	362
280 BS 35	0	32	16	48	0	00.00%	32	14	0	46
281 BS 35	2	48	34	84	0	00.00%	58	18	3	79
283 BS 34	10	75	32	117	0	00.00%	75	34	3	112
301 BS 50	9	163	125	297	0	00.00%	116	172	4	292
306 BS 50	130	724	519	1373	0	00.00%	528	731	58	1317
309 BS 39	11	18	10	39	0	00.00%	24	10	4	38
311 BS 39	21	109	98	228	0	00.00%	31	188	4	223
314 BS 39	157	566	484	1207	0	00.00%	231	896	39	1166
315 BS 50	139	547	425	1111	0	00.00%	330	700	44	1074
316 BS 39	71	235	235	541	0	00.00%	151	360	11	522
330 BS 48	48	260	157	465	0	00.00%	140	301	16	457
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	49	63	5	117
334 BS 63	37	188	121	346	0	00.00%	41	299	4	344
336 BS 39	218	763	510	1491	0	00.00%	112	1349	9	1470
338 BS 50	102	562	368	1032	0	00.00%	369	615	25	1009
340 BS 19	21	94	45	160	0	00.00%	12	143	1	156
341 BS 19	23	157	143	323	0	00.00%	165	128	18	311
343 BS 38	30	213	195	438	0	00.00%	165	240	22	427
345 BS 39	24	113	98	235	0	00.00%	21	211	3	235
347 BS 38	44	167	118	329	0	00.00%	78	233	9	320
389 BS 19	13	108	54	175	0	00.00%	60	113	1	174
391 BS 19	3	10	11	24	0	00.00%	13	8	1	22
394 BS 38	0	6	8	14	0	00.00%	8	4	2	14
398 BS 19	3	67	40	110	0	00.00%	53	54	2	109
399 BS 19	0	0	1	1	0	00.00%	1	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	982	358	44	1384
439-1 BS 52	0	14	1	15	0	00.00%	13	2	0	15
453 BS 72	140	643	483	1266	0	00.00%	874	299	49	1222
454 BS 66	109	835	498	1442	0	00.00%	945	405	55	1405
455 BS 55	0	6	5	11	0	00.00%	8	2	1	11
456 BS 46	155	937	459	1551	0	00.00%	1255	234	33	1522
457 BS 46	159	1059	613	1831	0	00.00%	1491	261	40	1792
460 BS 46	143	1424	679	2246	0	00.00%	1806	345	59	2210
461 BS 46	60	840	539	1439	0	00.00%	1140	230	42	1412
462 BS 46	66	884	496	1446	0	00.00%	1179	219	32	1430
464 BS 55	125	654	388	1167	0	00.00%	857	232	52	1141

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, Supreme Court, Place 6, Unexpired Term

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jeff Brown	DEM Lawrence Edward Meyers	LIB Mark Ash	Totals
471 BS 46	3	49	14	66	0	00.00%	44	19	1	64
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1208	433	53	1694
488 BS 55	38	314	244	596	0	00.00%	452	114	17	583
490 BS 69	68	504	389	961	0	00.00%	686	227	28	941
166 BS 57	83	527	423	1033	0	00.00%	719	246	39	1004
167 BS 57	0	3	0	3	0	00.00%	2	1	0	3
167 BS 77	28	185	90	303	0	00.00%	208	78	9	295
219 BS 43	10	51	57	118	0	00.00%	29	81	4	114
219 BS 44	1	8	8	17	0	00.00%	9	7	1	17
219 BS 45	10	58	48	116	0	00.00%	55	57	2	114
220 BS 35	12	124	95	231	0	00.00%	148	71	7	226
220 BS 53	43	435	402	880	0	00.00%	561	278	18	857
220 BS 54	0	0	2	2	0	00.00%	0	2	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	2
232 BS 37	17	94	86	197	0	00.00%	93	92	6	191
232 BS 67	7	22	11	40	0	00.00%	15	23	2	40
232 BS 68	38	240	143	421	0	00.00%	187	206	18	411
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	220	92	9	321
283 BS 53	20	297	315	632	0	00.00%	389	206	24	619
330 BS 49	24	161	127	312	0	00.00%	116	185	7	308
331 BS 48	8	27	18	53	0	00.00%	19	32	1	52
331 BS 49	6	7	4	17	0	00.00%	11	6	0	17
331 BS 65	83	394	232	709	0	00.00%	112	573	8	693
331 BS 64	0	13	7	20	0	00.00%	9	10	0	19
399 BS 28	2	10	6	18	0	00.00%	8	7	2	17
399 BS 31	3	22	14	39	0	00.00%	12	25	1	38
453 BS 73	1	19	7	27	0	00.00%	19	6	2	27
454 BS 72	1	4	4	9	0	00.00%	4	4	0	8
455 BS 56	102	356	234	692	0	00.00%	461	181	26	668
471 BS 66	21	402	266	689	0	00.00%	475	182	19	676
482 BS 61	2	9	3	14	0	00.00%	13	1	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	28
487 BS 66	1	12	7	20	0	00.00%	15	3	1	19
488 BS 56	43	439	298	780	0	00.00%	550	185	27	762
490 BS 70	42	222	193	457	0	00.00%	329	100	23	452
226 BS 34	3	64	21	88	0	00.00%	74	8	3	85
Totals	5221	35771	23958	64950	0		40295	20846	2017	63158

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, Supreme Court, Place 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jeff Boyd	DEM Gina Benavides	LIB Don Fulton	GRN Charles E. Waterbury	Totals
103 BS 39	14	151	83	248	0	00.00%	156	73	6	4	239
103 BS 76	9	59	58	126	0	00.00%	83	30	5	0	118
104 BS 39	10	164	113	287	0	00.00%	189	71	12	2	274
105 BS 39	3	19	13	35	0	00.00%	22	10	3	0	35
105-1 BS 50	22	79	79	180	0	00.00%	89	69	5	1	164
142 BS 38	63	411	277	751	0	00.00%	388	322	14	8	732
144 BS 57	79	465	273	817	0	00.00%	541	226	20	4	791
146 BS 38	65	461	331	857	0	00.00%	493	309	20	6	828
148 BS 38	132	641	444	1217	0	00.00%	723	420	30	5	1178
150 BS 38	50	419	267	736	0	00.00%	424	271	13	7	715
151 BS 38	54	542	413	1009	0	00.00%	711	230	29	12	982
152 BS 47	149	1196	665	2010	0	00.00%	1451	427	60	8	1946
159 BS 38	58	571	421	1050	0	00.00%	674	292	43	19	1028
165 BS 41	43	420	384	847	0	00.00%	590	201	31	4	826
166 BS 47	2	2	1	5	0	00.00%	3	2	0	0	5
167 BS 47	170	953	514	1637	0	00.00%	1190	341	46	12	1589
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	782	240	45	8	1075
172 BS 38	14	111	69	194	0	00.00%	129	56	3	0	188
192 BS 19	13	99	68	180	0	00.00%	116	55	4	0	175
193 BS 47	63	417	364	844	0	00.00%	575	204	35	4	818
197 BS 38	18	111	85	214	0	00.00%	142	55	6	2	205
218 BS 33	137	675	402	1214	0	00.00%	568	543	30	12	1153
219 BS 42	6	115	91	212	0	00.00%	123	74	7	0	204
220 BS 34	9	83	46	138	0	00.00%	122	14	0	0	136
221 BS 33	87	368	318	773	0	00.00%	523	194	21	10	748
223 BS 33	98	460	357	915	0	00.00%	449	364	31	9	853
224 BS 33	119	564	415	1098	0	00.00%	507	511	24	5	1047
225 BS 35	66	697	429	1192	0	00.00%	890	238	21	8	1157
226 BS 35	58	348	281	687	0	00.00%	395	245	20	5	665
227 BS 34	82	608	329	1019	0	00.00%	716	191	43	2	952
228 BS 34	69	747	417	1233	0	00.00%	919	227	36	9	1191
232 BS 33	1	0	0	1	0	00.00%	1	0	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	153	26	2	0	181
258 BS 34	43	410	304	757	0	00.00%	559	139	19	7	724
263 BS 58	93	1140	770	2003	0	00.00%	1467	447	47	12	1973
274 BS 33	22	106	198	326	0	00.00%	230	72	10	4	316
275 BS 33	27	61	55	143	0	00.00%	104	29	5	1	139
276 BS 33	70	381	313	764	0	00.00%	400	280	24	7	711
277 BS 34	44	533	262	839	0	00.00%	614	153	30	3	800

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, Supreme Court, Place 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jeff Boyd	DEM Gina Benavides	LIB Don Fulton	GRN Charles E. Waterbury	Totals
278 BS 34	64	549	329	942	0	00.00%	660	190	35	6	891
279 BS 34	21	201	148	370	0	00.00%	288	53	14	4	359
280 BS 35	0	32	16	48	0	00.00%	31	14	0	0	45
281 BS 35	2	48	34	84	0	00.00%	58	18	2	1	79
283 BS 34	10	75	32	117	0	00.00%	74	35	3	0	112
301 BS 50	9	163	125	297	0	00.00%	111	174	2	2	289
306 BS 50	130	724	519	1373	0	00.00%	506	742	50	15	1313
309 BS 39	11	18	10	39	0	00.00%	23	9	3	1	36
311 BS 39	21	109	98	228	0	00.00%	30	185	5	2	222
314 BS 39	157	566	484	1207	0	00.00%	224	892	32	11	1159
315 BS 50	139	547	425	1111	0	00.00%	312	708	35	15	1070
316 BS 39	71	235	235	541	0	00.00%	141	368	11	1	521
330 BS 48	48	260	157	465	0	00.00%	138	307	10	4	459
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	45	65	3	2	115
334 BS 63	37	188	121	346	0	00.00%	40	301	1	2	344
336 BS 39	218	763	510	1491	0	00.00%	105	1354	9	5	1473
338 BS 50	102	562	368	1032	0	00.00%	365	624	15	2	1006
340 BS 19	21	94	45	160	0	00.00%	11	142	1	2	156
341 BS 19	23	157	143	323	0	00.00%	158	129	13	8	308
343 BS 38	30	213	195	438	0	00.00%	159	246	19	4	428
345 BS 39	24	113	98	235	0	00.00%	22	209	3	0	234
347 BS 38	44	167	118	329	0	00.00%	76	235	8	1	320
389 BS 19	13	108	54	175	0	00.00%	57	113	1	1	172
391 BS 19	3	10	11	24	0	00.00%	13	10	0	0	23
394 BS 38	0	6	8	14	0	00.00%	8	5	1	0	14
398 BS 19	3	67	40	110	0	00.00%	49	54	2	3	108
399 BS 19	0	0	1	1	0	00.00%	1	0	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	968	359	43	14	1384
439-1 BS 52	0	14	1	15	0	00.00%	12	2	1	0	15
453 BS 72	140	643	483	1266	0	00.00%	851	311	41	11	1214
454 BS 66	109	835	498	1442	0	00.00%	909	425	49	17	1400
455 BS 55	0	6	5	11	0	00.00%	8	2	1	0	11
456 BS 46	155	937	459	1551	0	00.00%	1218	255	38	7	1518
457 BS 46	159	1059	613	1831	0	00.00%	1468	269	46	3	1786
460 BS 46	143	1424	679	2246	0	00.00%	1795	363	48	7	2213
461 BS 46	60	840	539	1439	0	00.00%	1114	248	43	9	1414
462 BS 46	66	884	496	1446	0	00.00%	1161	232	32	2	1427
464 BS 55	125	654	388	1167	0	00.00%	834	258	39	11	1142

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, Supreme Court, Place 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jeff Boyd	DEM Gina Benavides	LIB Don Fulton	GRN Charles E. Waterbury	Totals
471 BS 46	3	49	14	66	0	00.00%	42	21	1	0	64
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1191	442	52	9	1694
488 BS 55	38	314	244	596	0	00.00%	441	130	11	3	585
490 BS 69	68	504	389	961	0	00.00%	668	234	29	7	938
166 BS 57	83	527	423	1033	0	00.00%	708	244	37	8	997
167 BS 57	0	3	0	3	0	00.00%	2	1	0	0	3
167 BS 77	28	185	90	303	0	00.00%	203	85	5	3	296
219 BS 43	10	51	57	118	0	00.00%	29	80	4	0	113
219 BS 44	1	8	8	17	0	00.00%	8	7	1	1	17
219 BS 45	10	58	48	116	0	00.00%	54	57	2	0	113
220 BS 35	12	124	95	231	0	00.00%	145	74	7	0	226
220 BS 53	43	435	402	880	0	00.00%	541	286	19	8	854
220 BS 54	0	0	2	2	0	00.00%	0	2	0	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	0	2
232 BS 37	17	94	86	197	0	00.00%	92	94	5	1	192
232 BS 67	7	22	11	40	0	00.00%	17	22	1	0	40
232 BS 68	38	240	143	421	0	00.00%	181	212	12	2	407
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	214	101	5	1	321
283 BS 53	20	297	315	632	0	00.00%	377	212	25	5	619
330 BS 49	24	161	127	312	0	00.00%	109	190	8	0	307
331 BS 48	8	27	18	53	0	00.00%	19	32	1	0	52
331 BS 49	6	7	4	17	0	00.00%	10	7	0	0	17
331 BS 65	83	394	232	709	0	00.00%	113	560	11	4	688
331 BS 64	0	13	7	20	0	00.00%	9	10	0	0	19
399 BS 28	2	10	6	18	0	00.00%	6	8	3	0	17
399 BS 31	3	22	14	39	0	00.00%	11	26	0	0	37
453 BS 73	1	19	7	27	0	00.00%	19	6	2	0	27
454 BS 72	1	4	4	9	0	00.00%	4	3	0	1	8
455 BS 56	102	356	234	692	0	00.00%	449	188	22	8	667
471 BS 66	21	402	266	689	0	00.00%	468	187	10	8	673
482 BS 61	2	9	3	14	0	00.00%	12	2	0	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	0	28
487 BS 66	1	12	7	20	0	00.00%	15	3	1	0	19
488 BS 56	43	439	298	780	0	00.00%	539	195	20	6	760
490 BS 70	42	222	193	457	0	00.00%	327	96	21	6	450
226 BS 34	3	64	21	88	0	00.00%	72	8	3	2	85
Totals	5221	35771	23958	64950	0		39375	21386	1777	456	62994

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, Supreme Court, Place 8

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Phil Johnson	LIB RS Roberto Koelsch	GRN Jim Chisolm	Totals
103 BS 39	14	151	83	248	0	00.00%	169	17	17	203
103 BS 76	9	59	58	126	0	00.00%	83	13	7	103
104 BS 39	10	164	113	287	0	00.00%	202	27	17	246
105 BS 39	3	19	13	35	0	00.00%	23	7	2	32
105-1 BS 50	22	79	79	180	0	00.00%	98	14	27	139
142 BS 38	63	411	277	751	0	00.00%	428	57	55	540
144 BS 57	79	465	273	817	0	00.00%	577	45	42	664
146 BS 38	65	461	331	857	0	00.00%	532	77	55	664
148 BS 38	132	641	444	1217	0	00.00%	776	101	86	963
150 BS 38	50	419	267	736	0	00.00%	458	61	44	563
151 BS 38	54	542	413	1009	0	00.00%	751	71	59	881
152 BS 47	149	1196	665	2010	0	00.00%	1548	134	106	1788
159 BS 38	58	571	421	1050	0	00.00%	712	104	80	896
165 BS 41	43	420	384	847	0	00.00%	618	80	47	745
166 BS 47	2	2	1	5	0	00.00%	3	1	1	5
167 BS 47	170	953	514	1637	0	00.00%	1255	118	98	1471
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	823	90	73	986
172 BS 38	14	111	69	194	0	00.00%	138	7	12	157
192 BS 19	13	99	68	180	0	00.00%	124	12	8	144
193 BS 47	63	417	364	844	0	00.00%	614	79	47	740
197 BS 38	18	111	85	214	0	00.00%	152	13	13	178
218 BS 33	137	675	402	1214	0	00.00%	654	129	121	904
219 BS 42	6	115	91	212	0	00.00%	133	18	15	166
220 BS 34	9	83	46	138	0	00.00%	123	6	2	131
221 BS 33	87	368	318	773	0	00.00%	560	54	62	676
223 BS 33	98	460	357	915	0	00.00%	501	109	84	694
224 BS 33	119	564	415	1098	0	00.00%	582	122	105	809
225 BS 35	66	697	429	1192	0	00.00%	924	68	63	1055
226 BS 35	58	348	281	687	0	00.00%	426	57	33	516
227 BS 34	82	608	329	1019	0	00.00%	748	87	32	867
228 BS 34	69	747	417	1233	0	00.00%	968	70	46	1084
232 BS 33	1	0	0	1	0	00.00%	1	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	159	8	4	171
258 BS 34	43	410	304	757	0	00.00%	580	45	41	666
263 BS 58	93	1140	770	2003	0	00.00%	1536	173	109	1818
274 BS 33	22	106	198	326	0	00.00%	238	25	21	284
275 BS 33	27	61	55	143	0	00.00%	109	7	7	123
276 BS 33	70	381	313	764	0	00.00%	448	85	88	621
277 BS 34	44	533	262	839	0	00.00%	650	58	30	738

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, Supreme Court, Place 8

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Phil Johnson	LIB RS Roberto Koelsch	GRN Jim Chisolm	Totals
278 BS 34	64	549	329	942	0	00.00%	693	74	41	808
279 BS 34	21	201	148	370	0	00.00%	301	19	14	334
280 BS 35	0	32	16	48	0	00.00%	31	1	6	38
281 BS 35	2	48	34	84	0	00.00%	62	5	6	73
283 BS 34	10	75	32	117	0	00.00%	80	13	10	103
301 BS 50	9	163	125	297	0	00.00%	125	33	28	186
306 BS 50	130	724	519	1373	0	00.00%	566	202	207	975
309 BS 39	11	18	10	39	0	00.00%	23	5	4	32
311 BS 39	21	109	98	228	0	00.00%	39	20	20	79
314 BS 39	157	566	484	1207	0	00.00%	263	162	143	568
315 BS 50	139	547	425	1111	0	00.00%	376	148	157	681
316 BS 39	71	235	235	541	0	00.00%	177	57	42	276
330 BS 48	48	260	157	465	0	00.00%	153	50	44	247
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	51	13	8	72
334 BS 63	37	188	121	346	0	00.00%	44	29	30	103
336 BS 39	218	763	510	1491	0	00.00%	144	143	104	391
338 BS 50	102	562	368	1032	0	00.00%	409	102	62	573
340 BS 19	21	94	45	160	0	00.00%	15	18	10	43
341 BS 19	23	157	143	323	0	00.00%	173	34	30	237
343 BS 38	30	213	195	438	0	00.00%	177	56	39	272
345 BS 39	24	113	98	235	0	00.00%	25	20	15	60
347 BS 38	44	167	118	329	0	00.00%	90	33	29	152
389 BS 19	13	108	54	175	0	00.00%	61	16	11	88
391 BS 19	3	10	11	24	0	00.00%	14	1	0	15
394 BS 38	0	6	8	14	0	00.00%	8	1	2	11
398 BS 19	3	67	40	110	0	00.00%	57	8	7	72
399 BS 19	0	0	1	1	0	00.00%	1	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	1015	101	90	1206
439-1 BS 52	0	14	1	15	0	00.00%	13	1	1	15
453 BS 72	140	643	483	1266	0	00.00%	928	85	95	1108
454 BS 66	109	835	498	1442	0	00.00%	982	132	135	1249
455 BS 55	0	6	5	11	0	00.00%	8	2	0	10
456 BS 46	155	937	459	1551	0	00.00%	1275	80	74	1429
457 BS 46	159	1059	613	1831	0	00.00%	1516	99	66	1681
460 BS 46	143	1424	679	2246	0	00.00%	1844	116	100	2060
461 BS 46	60	840	539	1439	0	00.00%	1164	90	66	1320
462 BS 46	66	884	496	1446	0	00.00%	1199	84	59	1342
464 BS 55	125	654	388	1167	0	00.00%	892	78	84	1054

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, Supreme Court, Place 8

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Phil Johnson	LIB RS Roberto Koelsch	GRN Jim Chisolm	Totals
471 BS 46	3	49	14	66	0	00.00%	49	2	2	53
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1257	159	125	1541
488 BS 55	38	314	244	596	0	00.00%	459	44	35	538
490 BS 69	68	504	389	961	0	00.00%	712	94	59	865
166 BS 57	83	527	423	1033	0	00.00%	732	93	76	901
167 BS 57	0	3	0	3	0	00.00%	3	0	0	3
167 BS 77	28	185	90	303	0	00.00%	213	23	27	263
219 BS 43	10	51	57	118	0	00.00%	33	16	13	62
219 BS 44	1	8	8	17	0	00.00%	8	2	3	13
219 BS 45	10	58	48	116	0	00.00%	63	9	13	85
220 BS 35	12	124	95	231	0	00.00%	159	18	15	192
220 BS 53	43	435	402	880	0	00.00%	569	81	68	718
220 BS 54	0	0	2	2	0	00.00%	0	1	0	1
228 BS 35	0	2	0	2	0	00.00%	2	0	0	2
232 BS 37	17	94	86	197	0	00.00%	103	22	12	137
232 BS 67	7	22	11	40	0	00.00%	17	4	7	28
232 BS 68	38	240	143	421	0	00.00%	201	41	40	282
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	233	24	20	277
283 BS 53	20	297	315	632	0	00.00%	402	69	58	529
330 BS 49	24	161	127	312	0	00.00%	125	35	16	176
331 BS 48	8	27	18	53	0	00.00%	18	11	4	33
331 BS 49	6	7	4	17	0	00.00%	11	0	1	12
331 BS 65	83	394	232	709	0	00.00%	139	86	52	277
331 BS 64	0	13	7	20	0	00.00%	9	1	1	11
399 BS 28	2	10	6	18	0	00.00%	7	7	0	14
399 BS 31	3	22	14	39	0	00.00%	15	2	4	21
453 BS 73	1	19	7	27	0	00.00%	19	3	2	24
454 BS 72	1	4	4	9	0	00.00%	4	1	2	7
455 BS 56	102	356	234	692	0	00.00%	476	60	48	584
471 BS 66	21	402	266	689	0	00.00%	490	58	51	599
482 BS 61	2	9	3	14	0	00.00%	13	0	0	13
482 BS 62	6	16	6	28	0	00.00%	24	0	1	25
487 BS 66	1	12	7	20	0	00.00%	15	2	1	18
488 BS 56	43	439	298	780	0	00.00%	573	61	39	673
490 BS 70	42	222	193	457	0	00.00%	338	30	37	405
226 BS 34	3	64	21	88	0	00.00%	74	6	2	82
Totals	5221	35771	23958	64950	0		41983	5445	4432	51860

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, Court of Criminal Appeals, Place 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Bert Richardson	DEM John Granberg	LIB Mark W. Bennett	Totals
103 BS 39	14	151	83	248	0	00.00%	157	70	12	239
103 BS 76	9	59	58	126	0	00.00%	77	34	7	118
104 BS 39	10	164	113	287	0	00.00%	185	66	21	272
105 BS 39	3	19	13	35	0	00.00%	23	10	2	35
105-1 BS 50	22	79	79	180	0	00.00%	93	67	3	163
142 BS 38	63	411	277	751	0	00.00%	388	322	18	728
144 BS 57	79	465	273	817	0	00.00%	546	216	26	788
146 BS 38	65	461	331	857	0	00.00%	483	310	30	823
148 BS 38	132	641	444	1217	0	00.00%	721	410	39	1170
150 BS 38	50	419	267	736	0	00.00%	427	268	19	714
151 BS 38	54	542	413	1009	0	00.00%	705	231	46	982
152 BS 47	149	1196	665	2010	0	00.00%	1478	398	59	1935
159 BS 38	58	571	421	1050	0	00.00%	685	291	51	1027
165 BS 41	43	420	384	847	0	00.00%	595	194	34	823
166 BS 47	2	2	1	5	0	00.00%	3	2	0	5
167 BS 47	170	953	514	1637	0	00.00%	1200	319	66	1585
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	787	228	56	1071
172 BS 38	14	111	69	194	0	00.00%	132	56	0	188
192 BS 19	13	99	68	180	0	00.00%	117	50	6	173
193 BS 47	63	417	364	844	0	00.00%	582	188	44	814
197 BS 38	18	111	85	214	0	00.00%	145	53	7	205
218 BS 33	137	675	402	1214	0	00.00%	575	525	42	1142
219 BS 42	6	115	91	212	0	00.00%	128	66	7	201
220 BS 34	9	83	46	138	0	00.00%	119	16	1	136
221 BS 33	87	368	318	773	0	00.00%	529	190	25	744
223 BS 33	98	460	357	915	0	00.00%	454	353	35	842
224 BS 33	119	564	415	1098	0	00.00%	511	489	38	1038
225 BS 35	66	697	429	1192	0	00.00%	885	234	34	1153
226 BS 35	58	348	281	687	0	00.00%	403	239	16	658
227 BS 34	82	608	329	1019	0	00.00%	715	191	43	949
228 BS 34	69	747	417	1233	0	00.00%	929	220	38	1187
232 BS 33	1	0	0	1	0	00.00%	1	0	0	1
232-3 BS 37	10	122	53	185	0	00.00%	150	25	6	181
258 BS 34	43	410	304	757	0	00.00%	552	141	29	722
263 BS 58	93	1140	770	2003	0	00.00%	1474	421	71	1966
274 BS 33	22	106	198	326	0	00.00%	233	66	17	316
275 BS 33	27	61	55	143	0	00.00%	105	29	5	139
276 BS 33	70	381	313	764	0	00.00%	407	267	35	709
277 BS 34	44	533	262	839	0	00.00%	607	166	28	801

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, Court of Criminal Appeals, Place 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Bert Richardson	DEM John Granberg	LIB Mark W. Bennett	Totals
278 BS 34	64	549	329	942	0	00.00%	662	184	46	892
279 BS 34	21	201	148	370	0	00.00%	288	54	17	359
280 BS 35	0	32	16	48	0	00.00%	31	14	0	45
281 BS 35	2	48	34	84	0	00.00%	57	20	3	80
283 BS 34	10	75	32	117	0	00.00%	76	34	3	113
301 BS 50	9	163	125	297	0	00.00%	108	170	11	289
306 BS 50	130	724	519	1373	0	00.00%	524	725	59	1308
309 BS 39	11	18	10	39	0	00.00%	23	10	3	36
311 BS 39	21	109	98	228	0	00.00%	30	187	4	221
314 BS 39	157	566	484	1207	0	00.00%	228	883	41	1152
315 BS 50	139	547	425	1111	0	00.00%	314	699	49	1062
316 BS 39	71	235	235	541	0	00.00%	139	365	14	518
330 BS 48	48	260	157	465	0	00.00%	141	300	15	456
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	45	70	1	116
334 BS 63	37	188	121	346	0	00.00%	39	302	3	344
336 BS 39	218	763	510	1491	0	00.00%	107	1353	11	1471
338 BS 50	102	562	368	1032	0	00.00%	369	615	23	1007
340 BS 19	21	94	45	160	0	00.00%	11	142	1	154
341 BS 19	23	157	143	323	0	00.00%	154	130	23	307
343 BS 38	30	213	195	438	0	00.00%	162	244	19	425
345 BS 39	24	113	98	235	0	00.00%	20	210	4	234
347 BS 38	44	167	118	329	0	00.00%	77	234	10	321
389 BS 19	13	108	54	175	0	00.00%	59	110	2	171
391 BS 19	3	10	11	24	0	00.00%	12	9	1	22
394 BS 38	0	6	8	14	0	00.00%	7	6	1	14
398 BS 19	3	67	40	110	0	00.00%	52	52	4	108
399 BS 19	0	0	1	1	0	00.00%	1	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	976	361	43	1380
439-1 BS 52	0	14	1	15	0	00.00%	13	2	0	15
453 BS 72	140	643	483	1266	0	00.00%	853	304	59	1216
454 BS 66	109	835	498	1442	0	00.00%	928	399	62	1389
455 BS 55	0	6	5	11	0	00.00%	7	3	1	11
456 BS 46	155	937	459	1551	0	00.00%	1238	228	46	1512
457 BS 46	159	1059	613	1831	0	00.00%	1473	262	48	1783
460 BS 46	143	1424	679	2246	0	00.00%	1781	355	62	2198
461 BS 46	60	840	539	1439	0	00.00%	1134	227	46	1407
462 BS 46	66	884	496	1446	0	00.00%	1168	217	35	1420
464 BS 55	125	654	388	1167	0	00.00%	848	230	59	1137

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, Court of Criminal Appeals, Place 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Bert Richardson	DEM John Granberg	LIB Mark W. Bennett	Totals
471 BS 46	3	49	14	66	0	00.00%	41	19	3	63
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1186	429	71	1686
488 BS 55	38	314	244	596	0	00.00%	441	127	17	585
490 BS 69	68	504	389	961	0	00.00%	675	225	35	935
166 BS 57	83	527	423	1033	0	00.00%	705	240	47	992
167 BS 57	0	3	0	3	0	00.00%	2	1	0	3
167 BS 77	28	185	90	303	0	00.00%	203	78	13	294
219 BS 43	10	51	57	118	0	00.00%	28	83	3	114
219 BS 44	1	8	8	17	0	00.00%	9	7	1	17
219 BS 45	10	58	48	116	0	00.00%	54	57	3	114
220 BS 35	12	124	95	231	0	00.00%	146	73	7	226
220 BS 53	43	435	402	880	0	00.00%	547	275	28	850
220 BS 54	0	0	2	2	0	00.00%	0	2	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	2
232 BS 37	17	94	86	197	0	00.00%	94	92	5	191
232 BS 67	7	22	11	40	0	00.00%	14	24	2	40
232 BS 68	38	240	143	421	0	00.00%	185	207	17	409
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	220	91	8	319
283 BS 53	20	297	315	632	0	00.00%	374	204	37	615
330 BS 49	24	161	127	312	0	00.00%	114	183	9	306
331 BS 48	8	27	18	53	0	00.00%	18	33	1	52
331 BS 49	6	7	4	17	0	00.00%	10	7	0	17
331 BS 65	83	394	232	709	0	00.00%	111	567	9	687
331 BS 64	0	13	7	20	0	00.00%	9	10	0	19
399 BS 28	2	10	6	18	0	00.00%	7	8	2	17
399 BS 31	3	22	14	39	0	00.00%	12	26	0	38
453 BS 73	1	19	7	27	0	00.00%	19	6	2	27
454 BS 72	1	4	4	9	0	00.00%	4	4	0	8
455 BS 56	102	356	234	692	0	00.00%	452	184	28	664
471 BS 66	21	402	266	689	0	00.00%	461	186	25	672
482 BS 61	2	9	3	14	0	00.00%	13	1	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	28
487 BS 66	1	12	7	20	0	00.00%	15	3	0	18
488 BS 56	43	439	298	780	0	00.00%	539	190	28	757
490 BS 70	42	222	193	457	0	00.00%	327	94	28	449
226 BS 34	3	64	21	88	0	00.00%	74	7	3	84
Totals	5221	35771	23958	64950	0		39596	20878	2277	62751

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, Court of Criminal Appeals, Place 4

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kevin Patrick Yeary	LIB Quanah Parker	GRN Judith Sanders-Castro	Totals
103 BS 39	14	151	83	248	0	00.00%	169	22	13	204
103 BS 76	9	59	58	126	0	00.00%	87	13	5	105
104 BS 39	10	164	113	287	0	00.00%	195	33	21	249
105 BS 39	3	19	13	35	0	00.00%	23	6	4	33
105-1 BS 50	22	79	79	180	0	00.00%	99	14	28	141
142 BS 38	63	411	277	751	0	00.00%	425	62	57	544
144 BS 57	79	465	273	817	0	00.00%	560	61	43	664
146 BS 38	65	461	331	857	0	00.00%	522	86	59	667
148 BS 38	132	641	444	1217	0	00.00%	764	115	86	965
150 BS 38	50	419	267	736	0	00.00%	454	56	54	564
151 BS 38	54	542	413	1009	0	00.00%	748	71	60	879
152 BS 47	149	1196	665	2010	0	00.00%	1536	139	116	1791
159 BS 38	58	571	421	1050	0	00.00%	713	102	82	897
165 BS 41	43	420	384	847	0	00.00%	626	64	57	747
166 BS 47	2	2	1	5	0	00.00%	3	1	1	5
167 BS 47	170	953	514	1637	0	00.00%	1257	119	101	1477
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	826	85	74	985
172 BS 38	14	111	69	194	0	00.00%	138	9	11	158
192 BS 19	13	99	68	180	0	00.00%	123	13	10	146
193 BS 47	63	417	364	844	0	00.00%	620	65	54	739
197 BS 38	18	111	85	214	0	00.00%	147	17	13	177
218 BS 33	137	675	402	1214	0	00.00%	629	142	132	903
219 BS 42	6	115	91	212	0	00.00%	131	23	12	166
220 BS 34	9	83	46	138	0	00.00%	123	6	2	131
221 BS 33	87	368	318	773	0	00.00%	553	62	63	678
223 BS 33	98	460	357	915	0	00.00%	487	103	99	689
224 BS 33	119	564	415	1098	0	00.00%	568	121	120	809
225 BS 35	66	697	429	1192	0	00.00%	916	76	69	1061
226 BS 35	58	348	281	687	0	00.00%	423	57	41	521
227 BS 34	82	608	329	1019	0	00.00%	733	93	35	861
228 BS 34	69	747	417	1233	0	00.00%	959	76	49	1084
232 BS 33	1	0	0	1	0	00.00%	0	0	0	0
232-3 BS 37	10	122	53	185	0	00.00%	154	10	7	171
258 BS 34	43	410	304	757	0	00.00%	580	48	41	669
263 BS 58	93	1140	770	2003	0	00.00%	1540	151	135	1826
274 BS 33	22	106	198	326	0	00.00%	238	34	15	287
275 BS 33	27	61	55	143	0	00.00%	107	9	7	123
276 BS 33	70	381	313	764	0	00.00%	439	94	87	620
277 BS 34	44	533	262	839	0	00.00%	640	51	47	738

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, Court of Criminal Appeals, Place 4

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kevin Patrick Yeary	LIB Quanah Parker	GRN Judith Sanders-Castro	Totals
278 BS 34	64	549	329	942	0	00.00%	695	71	43	809
279 BS 34	21	201	148	370	0	00.00%	294	26	14	334
280 BS 35	0	32	16	48	0	00.00%	31	1	6	38
281 BS 35	2	48	34	84	0	00.00%	63	8	4	75
283 BS 34	10	75	32	117	0	00.00%	80	9	13	102
301 BS 50	9	163	125	297	0	00.00%	120	33	34	187
306 BS 50	130	724	519	1373	0	00.00%	549	220	218	987
309 BS 39	11	18	10	39	0	00.00%	22	6	4	32
311 BS 39	21	109	98	228	0	00.00%	35	18	23	76
314 BS 39	157	566	484	1207	0	00.00%	262	163	159	584
315 BS 50	139	547	425	1111	0	00.00%	363	148	174	685
316 BS 39	71	235	235	541	0	00.00%	170	52	61	283
330 BS 48	48	260	157	465	0	00.00%	153	52	45	250
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	51	13	10	74
334 BS 63	37	188	121	346	0	00.00%	42	35	28	105
336 BS 39	218	763	510	1491	0	00.00%	137	162	108	407
338 BS 50	102	562	368	1032	0	00.00%	409	109	71	589
340 BS 19	21	94	45	160	0	00.00%	14	19	11	44
341 BS 19	23	157	143	323	0	00.00%	172	36	30	238
343 BS 38	30	213	195	438	0	00.00%	173	54	47	274
345 BS 39	24	113	98	235	0	00.00%	25	21	14	60
347 BS 38	44	167	118	329	0	00.00%	88	30	35	153
389 BS 19	13	108	54	175	0	00.00%	60	22	6	88
391 BS 19	3	10	11	24	0	00.00%	13	0	0	13
394 BS 38	0	6	8	14	0	00.00%	7	2	2	11
398 BS 19	3	67	40	110	0	00.00%	57	8	7	72
399 BS 19	0	0	1	1	0	00.00%	1	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	1013	104	100	1217
439-1 BS 52	0	14	1	15	0	00.00%	13	1	1	15
453 BS 72	140	643	483	1266	0	00.00%	907	95	103	1105
454 BS 66	109	835	498	1442	0	00.00%	967	146	140	1253
455 BS 55	0	6	5	11	0	00.00%	8	2	0	10
456 BS 46	155	937	459	1551	0	00.00%	1273	76	80	1429
457 BS 46	159	1059	613	1831	0	00.00%	1509	102	68	1679
460 BS 46	143	1424	679	2246	0	00.00%	1843	122	98	2063
461 BS 46	60	840	539	1439	0	00.00%	1156	92	75	1323
462 BS 46	66	884	496	1446	0	00.00%	1193	66	81	1340
464 BS 55	125	654	388	1167	0	00.00%	876	101	76	1053

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, Court of Criminal Appeals, Place 4

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kevin Patrick Yeary	LIB Quanah Parker	GRN Judith Sanders-Castro	Totals
471 BS 46	3	49	14	66	0	00.00%	47	2	2	51
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1256	141	147	1544
488 BS 55	38	314	244	596	0	00.00%	464	34	41	539
490 BS 69	68	504	389	961	0	00.00%	709	91	65	865
166 BS 57	83	527	423	1033	0	00.00%	728	82	95	905
167 BS 57	0	3	0	3	0	00.00%	2	0	1	3
167 BS 77	28	185	90	303	0	00.00%	213	27	23	263
219 BS 43	10	51	57	118	0	00.00%	31	22	11	64
219 BS 44	1	8	8	17	0	00.00%	8	4	1	13
219 BS 45	10	58	48	116	0	00.00%	65	7	16	88
220 BS 35	12	124	95	231	0	00.00%	157	15	21	193
220 BS 53	43	435	402	880	0	00.00%	566	79	74	719
220 BS 54	0	0	2	2	0	00.00%	0	1	0	1
228 BS 35	0	2	0	2	0	00.00%	2	0	0	2
232 BS 37	17	94	86	197	0	00.00%	100	24	12	136
232 BS 67	7	22	11	40	0	00.00%	18	4	6	28
232 BS 68	38	240	143	421	0	00.00%	199	47	45	291
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	224	29	22	275
283 BS 53	20	297	315	632	0	00.00%	407	69	62	538
330 BS 49	24	161	127	312	0	00.00%	121	39	17	177
331 BS 48	8	27	18	53	0	00.00%	19	11	3	33
331 BS 49	6	7	4	17	0	00.00%	10	1	1	12
331 BS 65	83	394	232	709	0	00.00%	136	87	58	281
331 BS 64	0	13	7	20	0	00.00%	9	0	2	11
399 BS 28	2	10	6	18	0	00.00%	7	6	2	15
399 BS 31	3	22	14	39	0	00.00%	13	3	4	20
453 BS 73	1	19	7	27	0	00.00%	19	3	2	24
454 BS 72	1	4	4	9	0	00.00%	4	0	3	7
455 BS 56	102	356	234	692	0	00.00%	474	48	60	582
471 BS 66	21	402	266	689	0	00.00%	492	57	55	604
482 BS 61	2	9	3	14	0	00.00%	14	0	0	14
482 BS 62	6	16	6	28	0	00.00%	24	0	1	25
487 BS 66	1	12	7	20	0	00.00%	15	1	3	19
488 BS 56	43	439	298	780	0	00.00%	569	59	47	675
490 BS 70	42	222	193	457	0	00.00%	338	38	33	409
226 BS 34	3	64	21	88	0	00.00%	75	5	2	82
Totals	5221	35771	23958	64950	0		41634	5570	4836	52040

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, Court of Criminal Appeals, Place 9

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP David Newell	LIB William Bryan Strange, III	GRN George Joseph Altgelt	Totals
103 BS 39	14	151	83	248	0	00.00%	169	24	9	202
103 BS 76	9	59	58	126	0	00.00%	88	14	3	105
104 BS 39	10	164	113	287	0	00.00%	200	34	12	246
105 BS 39	3	19	13	35	0	00.00%	22	7	3	32
105-1 BS 50	22	79	79	180	0	00.00%	96	20	24	140
142 BS 38	63	411	277	751	0	00.00%	431	65	48	544
144 BS 57	79	465	273	817	0	00.00%	570	61	37	668
146 BS 38	65	461	331	857	0	00.00%	531	93	45	669
148 BS 38	132	641	444	1217	0	00.00%	776	114	71	961
150 BS 38	50	419	267	736	0	00.00%	459	67	39	565
151 BS 38	54	542	413	1009	0	00.00%	748	74	55	877
152 BS 47	149	1196	665	2010	0	00.00%	1532	147	104	1783
159 BS 38	58	571	421	1050	0	00.00%	727	97	69	893
165 BS 41	43	420	384	847	0	00.00%	624	79	44	747
166 BS 47	2	2	1	5	0	00.00%	3	1	1	5
167 BS 47	170	953	514	1637	0	00.00%	1261	123	90	1474
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	834	94	59	987
172 BS 38	14	111	69	194	0	00.00%	139	9	8	156
192 BS 19	13	99	68	180	0	00.00%	125	15	6	146
193 BS 47	63	417	364	844	0	00.00%	616	71	47	734
197 BS 38	18	111	85	214	0	00.00%	149	16	11	176
218 BS 33	137	675	402	1214	0	00.00%	639	144	114	897
219 BS 42	6	115	91	212	0	00.00%	130	20	14	164
220 BS 34	9	83	46	138	0	00.00%	123	6	2	131
221 BS 33	87	368	318	773	0	00.00%	558	65	53	676
223 BS 33	98	460	357	915	0	00.00%	496	105	77	678
224 BS 33	119	564	415	1098	0	00.00%	579	125	103	807
225 BS 35	66	697	429	1192	0	00.00%	928	67	61	1056
226 BS 35	58	348	281	687	0	00.00%	426	65	26	517
227 BS 34	82	608	329	1019	0	00.00%	742	91	25	858
228 BS 34	69	747	417	1233	0	00.00%	965	75	43	1083
232 BS 33	1	0	0	1	0	00.00%	0	0	0	0
232-3 BS 37	10	122	53	185	0	00.00%	157	7	7	171
258 BS 34	43	410	304	757	0	00.00%	576	55	37	668
263 BS 58	93	1140	770	2003	0	00.00%	1538	165	112	1815
274 BS 33	22	106	198	326	0	00.00%	240	28	17	285
275 BS 33	27	61	55	143	0	00.00%	109	6	8	123
276 BS 33	70	381	313	764	0	00.00%	436	103	73	612
277 BS 34	44	533	262	839	0	00.00%	648	65	26	739

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, Court of Criminal Appeals, Place 9

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP David Newell	LIB William Bryan Strange, III	GRN George Joseph Altgelt	Totals
278 BS 34	64	549	329	942	0	00.00%	697	78	33	808
279 BS 34	21	201	148	370	0	00.00%	296	25	13	334
280 BS 35	0	32	16	48	0	00.00%	31	1	6	38
281 BS 35	2	48	34	84	0	00.00%	62	9	4	75
283 BS 34	10	75	32	117	0	00.00%	82	10	10	102
301 BS 50	9	163	125	297	0	00.00%	121	39	25	185
306 BS 50	130	724	519	1373	0	00.00%	568	223	189	980
309 BS 39	11	18	10	39	0	00.00%	23	5	4	32
311 BS 39	21	109	98	228	0	00.00%	35	23	20	78
314 BS 39	157	566	484	1207	0	00.00%	271	167	141	579
315 BS 50	139	547	425	1111	0	00.00%	381	149	147	677
316 BS 39	71	235	235	541	0	00.00%	175	62	44	281
330 BS 48	48	260	157	465	0	00.00%	161	61	29	251
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	52	13	9	74
334 BS 63	37	188	121	346	0	00.00%	45	39	21	105
336 BS 39	218	763	510	1491	0	00.00%	138	174	93	405
338 BS 50	102	562	368	1032	0	00.00%	406	116	58	580
340 BS 19	21	94	45	160	0	00.00%	13	21	9	43
341 BS 19	23	157	143	323	0	00.00%	172	37	28	237
343 BS 38	30	213	195	438	0	00.00%	177	56	40	273
345 BS 39	24	113	98	235	0	00.00%	24	25	11	60
347 BS 38	44	167	118	329	0	00.00%	91	32	28	151
389 BS 19	13	108	54	175	0	00.00%	61	20	6	87
391 BS 19	3	10	11	24	0	00.00%	13	1	0	14
394 BS 38	0	6	8	14	0	00.00%	8	2	1	11
398 BS 19	3	67	40	110	0	00.00%	61	6	4	71
399 BS 19	0	0	1	1	0	00.00%	1	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	1007	113	90	1210
439-1 BS 52	0	14	1	15	0	00.00%	13	1	1	15
453 BS 72	140	643	483	1266	0	00.00%	906	92	104	1102
454 BS 66	109	835	498	1442	0	00.00%	975	153	122	1250
455 BS 55	0	6	5	11	0	00.00%	8	2	0	10
456 BS 46	155	937	459	1551	0	00.00%	1271	84	71	1426
457 BS 46	159	1059	613	1831	0	00.00%	1510	99	66	1675
460 BS 46	143	1424	679	2246	0	00.00%	1844	123	89	2056
461 BS 46	60	840	539	1439	0	00.00%	1164	91	66	1321
462 BS 46	66	884	496	1446	0	00.00%	1203	77	58	1338
464 BS 55	125	654	388	1167	0	00.00%	881	98	72	1051

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, Court of Criminal Appeals, Place 9

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP David Newell	LIB William Bryan Strange, III	GRN George Joseph Altgelt	Totals
471 BS 46	3	49	14	66	0	00.00%	45	3	2	50
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1258	167	116	1541
488 BS 55	38	314	244	596	0	00.00%	473	41	26	540
490 BS 69	68	504	389	961	0	00.00%	715	90	57	862
166 BS 57	83	527	423	1033	0	00.00%	730	86	86	902
167 BS 57	0	3	0	3	0	00.00%	2	0	1	3
167 BS 77	28	185	90	303	0	00.00%	216	21	26	263
219 BS 43	10	51	57	118	0	00.00%	33	19	11	63
219 BS 44	1	8	8	17	0	00.00%	8	4	1	13
219 BS 45	10	58	48	116	0	00.00%	63	16	9	88
220 BS 35	12	124	95	231	0	00.00%	156	21	14	191
220 BS 53	43	435	402	880	0	00.00%	563	81	73	717
220 BS 54	0	0	2	2	0	00.00%	0	1	0	1
228 BS 35	0	2	0	2	0	00.00%	2	0	0	2
232 BS 37	17	94	86	197	0	00.00%	100	21	12	133
232 BS 67	7	22	11	40	0	00.00%	17	7	3	27
232 BS 68	38	240	143	421	0	00.00%	199	51	37	287
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	234	23	19	276
283 BS 53	20	297	315	632	0	00.00%	403	78	54	535
330 BS 49	24	161	127	312	0	00.00%	120	36	15	171
331 BS 48	8	27	18	53	0	00.00%	19	12	2	33
331 BS 49	6	7	4	17	0	00.00%	11	0	1	12
331 BS 65	83	394	232	709	0	00.00%	138	98	39	275
331 BS 64	0	13	7	20	0	00.00%	9	2	0	11
399 BS 28	2	10	6	18	0	00.00%	9	5	0	14
399 BS 31	3	22	14	39	0	00.00%	13	3	3	19
453 BS 73	1	19	7	27	0	00.00%	19	3	2	24
454 BS 72	1	4	4	9	0	00.00%	5	0	2	7
455 BS 56	102	356	234	692	0	00.00%	479	55	44	578
471 BS 66	21	402	266	689	0	00.00%	491	72	39	602
482 BS 61	2	9	3	14	0	00.00%	14	0	0	14
482 BS 62	6	16	6	28	0	00.00%	24	0	1	25
487 BS 66	1	12	7	20	0	00.00%	15	3	1	19
488 BS 56	43	439	298	780	0	00.00%	568	67	38	673
490 BS 70	42	222	193	457	0	00.00%	342	37	30	409
226 BS 34	3	64	21	88	0	00.00%	74	6	2	82
Totals	5221	35771	23958	64950	0		41904	5873	4061	51838

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Member, State Board of Education, District 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP David Bradley	DEM Kathy King	LIB Megan DaGata	Totals
103 BS 39	14	151	83	248	0	00.00%	156	76	9	241
103 BS 76	9	59	58	126	0	00.00%	78	38	6	122
104 BS 39	10	164	113	287	0	00.00%	185	77	15	277
105 BS 39	3	19	13	35	0	00.00%	22	8	5	35
105-1 BS 50	22	79	79	180	0	00.00%	93	71	4	168
142 BS 38	63	411	277	751	0	00.00%	391	328	14	733
144 BS 57	79	465	273	817	0	00.00%	540	235	20	795
146 BS 38	65	461	331	857	0	00.00%	486	324	20	830
148 BS 38	132	641	444	1217	0	00.00%	710	440	28	1178
150 BS 38	50	419	267	736	0	00.00%	428	276	12	716
151 BS 38	54	542	413	1009	0	00.00%	710	239	30	979
152 BS 47	149	1196	665	2010	0	00.00%	1436	438	67	1941
159 BS 38	58	571	421	1050	0	00.00%	676	312	39	1027
165 BS 41	43	420	384	847	0	00.00%	585	215	27	827
166 BS 47	2	2	1	5	0	00.00%	3	2	0	5
167 BS 47	170	953	514	1637	0	00.00%	1184	358	50	1592
168 BS 39	0	0	0	0	0	00.00%	0	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	781	250	43	1074
172 BS 38	14	111	69	194	0	00.00%	130	57	1	188
192 BS 19	13	99	68	180	0	00.00%	117	54	2	173
193 BS 47	63	417	364	844	0	00.00%	581	204	34	819
197 BS 38	18	111	85	214	0	00.00%	143	55	8	206
218 BS 33	137	675	402	1214	0	00.00%	555	567	28	1150
219 BS 42	6	115	91	212	0	00.00%	119	76	8	203
220 BS 34	9	83	46	138	0	00.00%	120	15	1	136
221 BS 33	87	368	318	773	0	00.00%	514	216	18	748
223 BS 33	98	460	357	915	0	00.00%	451	372	26	849
224 BS 33	119	564	415	1098	0	00.00%	500	512	36	1048
225 BS 35	66	697	429	1192	0	00.00%	875	251	32	1158
226 BS 35	58	348	281	687	0	00.00%	389	262	14	665
227 BS 34	82	608	329	1019	0	00.00%	707	207	36	950
228 BS 34	69	747	417	1233	0	00.00%	917	244	30	1191
232 BS 33	1	0	0	1	0	00.00%	0	0	0	0
232-3 BS 37	10	122	53	185	0	00.00%	152	27	2	181
258 BS 34	43	410	304	757	0	00.00%	554	153	18	725
263 BS 58	93	1140	770	2003	0	00.00%	1465	461	47	1973
274 BS 33	22	106	198	326	0	00.00%	231	80	9	320
275 BS 33	27	61	55	143	0	00.00%	105	30	4	139
276 BS 33	70	381	313	764	0	00.00%	402	292	25	719
277 BS 34	44	533	262	839	0	00.00%	607	179	18	804

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Member, State Board of Education, District 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP David Bradley	DEM Kathy King	LIB Megan DaGata	Totals
278 BS 34	64	549	329	942	0	00.00%	662	207	27	896
279 BS 34	21	201	148	370	0	00.00%	284	61	15	360
280 BS 35	0	32	16	48	0	00.00%	31	15	0	46
281 BS 35	2	48	34	84	0	00.00%	58	19	4	81
283 BS 34	10	75	32	117	0	00.00%	73	35	4	112
301 BS 50	9	163	125	297	0	00.00%	113	173	4	290
306 BS 50	130	724	519	1373	0	00.00%	493	774	47	1314
309 BS 39	11	18	10	39	0	00.00%	24	10	2	36
311 BS 39	21	109	98	228	0	00.00%	31	188	3	222
314 BS 39	157	566	484	1207	0	00.00%	221	905	37	1163
315 BS 50	139	547	425	1111	0	00.00%	317	717	40	1074
316 BS 39	71	235	235	541	0	00.00%	143	368	12	523
330 BS 48	48	260	157	465	0	00.00%	136	312	8	456
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	46	69	1	116
334 BS 63	37	188	121	346	0	00.00%	39	298	4	341
336 BS 39	218	763	510	1491	0	00.00%	109	1358	9	1476
338 BS 50	102	562	368	1032	0	00.00%	370	625	17	1012
340 BS 19	21	94	45	160	0	00.00%	11	143	1	155
341 BS 19	23	157	143	323	0	00.00%	161	133	17	311
343 BS 38	30	213	195	438	0	00.00%	157	255	17	429
345 BS 39	24	113	98	235	0	00.00%	22	209	2	233
347 BS 38	44	167	118	329	0	00.00%	75	237	9	321
389 BS 19	13	108	54	175	0	00.00%	57	113	2	172
391 BS 19	3	10	11	24	0	00.00%	11	10	1	22
394 BS 38	0	6	8	14	0	00.00%	7	6	1	14
398 BS 19	3	67	40	110	0	00.00%	49	58	2	109
399 BS 19	0	0	1	1	0	00.00%	1	0	0	1
439 BS 46	137	862	427	1426	0	00.00%	948	396	38	1382
439-1 BS 52	0	14	1	15	0	00.00%	12	2	1	15
453 BS 72	140	643	483	1266	0	00.00%	862	329	35	1226
454 BS 66	109	835	498	1442	0	00.00%	908	446	45	1399
455 BS 55	0	6	5	11	0	00.00%	8	2	1	11
456 BS 46	155	937	459	1551	0	00.00%	1195	285	38	1518
457 BS 46	159	1059	613	1831	0	00.00%	1465	297	34	1796
460 BS 46	143	1424	679	2246	0	00.00%	1760	395	50	2205
461 BS 46	60	840	539	1439	0	00.00%	1110	256	46	1412
462 BS 46	66	884	496	1446	0	00.00%	1142	248	34	1424
464 BS 55	125	654	388	1167	0	00.00%	824	280	38	1142

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Member, State Board of Education, District 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP David Bradley	DEM Kathy King	LIB Megan DaGata	Totals
471 BS 46	3	49	14	66	0	00.00%	42	19	2	63
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1174	470	53	1697
488 BS 55	38	314	244	596	0	00.00%	441	128	13	582
490 BS 69	68	504	389	961	0	00.00%	671	242	24	937
166 BS 57	83	527	423	1033	0	00.00%	701	264	34	999
167 BS 57	0	3	0	3	0	00.00%	2	1	0	3
167 BS 77	28	185	90	303	0	00.00%	203	86	5	294
219 BS 43	10	51	57	118	0	00.00%	29	81	4	114
219 BS 44	1	8	8	17	0	00.00%	9	8	0	17
219 BS 45	10	58	48	116	0	00.00%	53	58	3	114
220 BS 35	12	124	95	231	0	00.00%	146	78	3	227
220 BS 53	43	435	402	880	0	00.00%	548	288	20	856
220 BS 54	0	0	2	2	0	00.00%	0	2	0	2
228 BS 35	0	2	0	2	0	00.00%	2	0	0	2
232 BS 37	17	94	86	197	0	00.00%	90	93	7	190
232 BS 67	7	22	11	40	0	00.00%	15	23	1	39
232 BS 68	38	240	143	421	0	00.00%	177	221	15	413
277 BS 35	0	0	0	0	0	00.00%	0	0	0	0
283 BS 35	26	203	104	333	0	00.00%	207	104	9	320
283 BS 53	20	297	315	632	0	00.00%	380	220	21	621
330 BS 49	24	161	127	312	0	00.00%	110	188	7	305
331 BS 48	8	27	18	53	0	00.00%	16	36	0	52
331 BS 49	6	7	4	17	0	00.00%	10	7	0	17
331 BS 65	83	394	232	709	0	00.00%	107	580	5	692
331 BS 64	0	13	7	20	0	00.00%	9	10	0	19
399 BS 28	2	10	6	18	0	00.00%	7	8	2	17
399 BS 31	3	22	14	39	0	00.00%	12	25	1	38
453 BS 73	1	19	7	27	0	00.00%	19	6	2	27
454 BS 72	1	4	4	9	0	00.00%	4	4	0	8
455 BS 56	102	356	234	692	0	00.00%	452	201	14	667
471 BS 66	21	402	266	689	0	00.00%	457	200	17	674
482 BS 61	2	9	3	14	0	00.00%	12	2	0	14
482 BS 62	6	16	6	28	0	00.00%	24	4	0	28
487 BS 66	1	12	7	20	0	00.00%	15	3	1	19
488 BS 56	43	439	298	780	0	00.00%	532	207	23	762
490 BS 70	42	222	193	457	0	00.00%	329	103	20	452
226 BS 34	3	64	21	88	0	00.00%	72	9	4	85
Totals	5221	35771	23958	64950	0		39110	22214	1742	63066

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

State Representative, District 23

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Wayne Faircloth	DEM Susan Criss	Totals
103 BS 39	14	151	83	248	0	00.00%	154	90	244
103 BS 76	9	59	58	126	0	00.00%	72	46	118
104 BS 39	10	164	113	287	0	00.00%	185	97	282
105 BS 39	3	19	13	35	0	00.00%	24	11	35
105-1 BS 50	22	79	79	180	0	00.00%	97	79	176
142 BS 38	63	411	277	751	0	00.00%	377	362	739
146 BS 38	65	461	331	857	0	00.00%	487	362	849
148 BS 38	132	641	444	1217	0	00.00%	710	494	1204
150 BS 38	50	419	267	736	0	00.00%	410	317	727
151 BS 38	54	542	413	1009	0	00.00%	748	246	994
159 BS 38	58	571	421	1050	0	00.00%	700	331	1031
165 BS 41	43	420	384	847	0	00.00%	605	229	834
168 BS 39	0	0	0	0	0	00.00%	0	0	0
172 BS 38	14	111	69	194	0	00.00%	125	66	191
197 BS 38	18	111	85	214	0	00.00%	146	63	209
218 BS 33	137	675	402	1214	0	00.00%	545	647	1192
219 BS 42	6	115	91	212	0	00.00%	125	82	207
221 BS 33	87	368	318	773	0	00.00%	523	238	761
223 BS 33	98	460	357	915	0	00.00%	447	455	902
224 BS 33	119	564	415	1098	0	00.00%	498	585	1083
232 BS 33	1	0	0	1	0	00.00%	0	0	0
232-3 BS 37	10	122	53	185	0	00.00%	153	30	183
274 BS 33	22	106	198	326	0	00.00%	227	94	321
275 BS 33	27	61	55	143	0	00.00%	109	33	142
276 BS 33	70	381	313	764	0	00.00%	415	335	750
301 BS 50	9	163	125	297	0	00.00%	111	182	293
306 BS 50	130	724	519	1373	0	00.00%	503	843	1346
309 BS 39	11	18	10	39	0	00.00%	22	17	39
311 BS 39	21	109	98	228	0	00.00%	29	194	223
314 BS 39	157	566	484	1207	0	00.00%	225	957	1182
315 BS 50	139	547	425	1111	0	00.00%	328	759	1087
316 BS 39	71	235	235	541	0	00.00%	133	398	531
330 BS 48	48	260	157	465	0	00.00%	136	323	459
331 BS 39	0	0	0	0	0	00.00%	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	48	69	117
336 BS 39	218	763	510	1491	0	00.00%	109	1367	1476
338 BS 50	102	562	368	1032	0	00.00%	353	666	1019
343 BS 38	30	213	195	438	0	00.00%	171	258	429
345 BS 39	24	113	98	235	0	00.00%	24	209	233
347 BS 38	44	167	118	329	0	00.00%	72	254	326

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

State Representative, District 23

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Wayne Faircloth	DEM Susan Criss	Totals
394 BS 38	0	6	8	14	0	00.00%	8	6	14
219 BS 43	10	51	57	118	0	00.00%	30	83	113
219 BS 44	1	8	8	17	0	00.00%	7	10	17
219 BS 45	10	58	48	116	0	00.00%	54	60	114
232 BS 37	17	94	86	197	0	00.00%	90	102	192
232 BS 67	7	22	11	40	0	00.00%	17	23	40
232 BS 68	38	240	143	421	0	00.00%	176	243	419
330 BS 49	24	161	127	312	0	00.00%	108	202	310
331 BS 48	8	27	18	53	0	00.00%	20	33	53
331 BS 49	6	7	4	17	0	00.00%	6	11	17
331 BS 65	83	394	232	709	0	00.00%	101	593	694
331 BS 64	0	13	7	20	0	00.00%	10	10	20
Totals	2347	12605	9369	24321	0		10773	13164	23937

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

State Representative, District 24

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Greg Bonnen	Totals
144 BS 57	79	465	273	817	0	00.00%	596	596
152 BS 47	149	1196	665	2010	0	00.00%	1611	1611
166 BS 47	2	2	1	5	0	00.00%	5	5
167 BS 47	170	953	514	1637	0	00.00%	1322	1322
170 BS 47	41	618	433	1092	0	00.00%	869	869
192 BS 19	13	99	68	180	0	00.00%	126	126
193 BS 47	63	417	364	844	0	00.00%	662	662
220 BS 34	9	83	46	138	0	00.00%	123	123
225 BS 35	66	697	429	1192	0	00.00%	951	951
226 BS 35	58	348	281	687	0	00.00%	451	451
227 BS 34	82	608	329	1019	0	00.00%	793	793
228 BS 34	69	747	417	1233	0	00.00%	993	993
258 BS 34	43	410	304	757	0	00.00%	612	612
263 BS 58	93	1140	770	2003	0	00.00%	1603	1603
277 BS 34	44	533	262	839	0	00.00%	669	669
278 BS 34	64	549	329	942	0	00.00%	733	733
279 BS 34	21	201	148	370	0	00.00%	313	313
280 BS 35	0	32	16	48	0	00.00%	30	30
281 BS 35	2	48	34	84	0	00.00%	64	64
283 BS 34	10	75	32	117	0	00.00%	84	84
330-1 BS 63	0	0	0	0	0	00.00%	0	0
334 BS 63	37	188	121	346	0	00.00%	62	62
340 BS 19	21	94	45	160	0	00.00%	16	16
341 BS 19	23	157	143	323	0	00.00%	189	189
389 BS 19	13	108	54	175	0	00.00%	64	64
391 BS 19	3	10	11	24	0	00.00%	15	15
398 BS 19	3	67	40	110	0	00.00%	64	64
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1046	1046
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	957	957
454 BS 66	109	835	498	1442	0	00.00%	1051	1051
455 BS 55	0	6	5	11	0	00.00%	7	7
456 BS 46	155	937	459	1551	0	00.00%	1309	1309
457 BS 46	159	1059	613	1831	0	00.00%	1575	1575
460 BS 46	143	1424	679	2246	0	00.00%	1909	1909
461 BS 46	60	840	539	1439	0	00.00%	1208	1208
462 BS 46	66	884	496	1446	0	00.00%	1245	1245
464 BS 55	125	654	388	1167	0	00.00%	940	940
471 BS 46	3	49	14	66	0	00.00%	48	48

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

State Representative, District 24

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Greg Bonnen	Totals
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1341	1341
488 BS 55	38	314	244	596	0	00.00%	484	484
490 BS 69	68	504	389	961	0	00.00%	768	768
166 BS 57	83	527	423	1033	0	00.00%	775	775
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	226	226
220 BS 35	12	124	95	231	0	00.00%	166	166
220 BS 53	43	435	402	880	0	00.00%	622	622
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	240	240
283 BS 53	20	297	315	632	0	00.00%	457	457
399 BS 28	2	10	6	18	0	00.00%	10	10
399 BS 31	3	22	14	39	0	00.00%	12	12
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	6	6
455 BS 56	102	356	234	692	0	00.00%	497	497
471 BS 66	21	402	266	689	0	00.00%	514	514
482 BS 61	2	9	3	14	0	00.00%	12	12
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	17	17
488 BS 56	43	439	298	780	0	00.00%	593	593
490 BS 70	42	222	193	457	0	00.00%	364	364
226 BS 34	3	64	21	88	0	00.00%	80	80
Totals	2874	23166	14589	40629	0		31561	31561

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Chief Justice, 14th Court of Appeals District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kem Thompson Frost	DEM Kyle Carter	Totals
103 BS 39	14	151	83	248	0	00.00%	165	74	239
103 BS 76	9	59	58	126	0	00.00%	79	38	117
104 BS 39	10	164	113	287	0	00.00%	189	82	271
105 BS 39	3	19	13	35	0	00.00%	24	11	35
105-1 BS 50	22	79	79	180	0	00.00%	97	73	170
142 BS 38	63	411	277	751	0	00.00%	395	335	730
144 BS 57	79	465	273	817	0	00.00%	555	229	784
146 BS 38	65	461	331	857	0	00.00%	502	319	821
148 BS 38	132	641	444	1217	0	00.00%	733	440	1173
150 BS 38	50	419	267	736	0	00.00%	431	289	720
151 BS 38	54	542	413	1009	0	00.00%	728	244	972
152 BS 47	149	1196	665	2010	0	00.00%	1507	424	1931
159 BS 38	58	571	421	1050	0	00.00%	716	307	1023
165 BS 41	43	420	384	847	0	00.00%	611	212	823
166 BS 47	2	2	1	5	0	00.00%	3	2	5
167 BS 47	170	953	514	1637	0	00.00%	1231	348	1579
168 BS 39	0	0	0	0	0	00.00%	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	802	260	1062
172 BS 38	14	111	69	194	0	00.00%	131	57	188
192 BS 19	13	99	68	180	0	00.00%	123	50	173
193 BS 47	63	417	364	844	0	00.00%	610	204	814
197 BS 38	18	111	85	214	0	00.00%	150	56	206
218 BS 33	137	675	402	1214	0	00.00%	585	553	1138
219 BS 42	6	115	91	212	0	00.00%	131	71	202
220 BS 34	9	83	46	138	0	00.00%	120	15	135
221 BS 33	87	368	318	773	0	00.00%	541	209	750
223 BS 33	98	460	357	915	0	00.00%	469	376	845
224 BS 33	119	564	415	1098	0	00.00%	520	512	1032
225 BS 35	66	697	429	1192	0	00.00%	901	238	1139
226 BS 35	58	348	281	687	0	00.00%	398	254	652
227 BS 34	82	608	329	1019	0	00.00%	731	208	939
228 BS 34	69	747	417	1233	0	00.00%	931	246	1177
232 BS 33	1	0	0	1	0	00.00%	1	0	1
232-3 BS 37	10	122	53	185	0	00.00%	155	25	180
258 BS 34	43	410	304	757	0	00.00%	561	154	715
263 BS 58	93	1140	770	2003	0	00.00%	1507	450	1957
274 BS 33	22	106	198	326	0	00.00%	240	76	316
275 BS 33	27	61	55	143	0	00.00%	107	29	136
276 BS 33	70	381	313	764	0	00.00%	417	287	704
277 BS 34	44	533	262	839	0	00.00%	616	178	794

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Chief Justice, 14th Court of Appeals District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kem Thompson Frost	DEM Kyle Carter	Totals
278 BS 34	64	549	329	942	0	00.00%	677	204	881
279 BS 34	21	201	148	370	0	00.00%	296	61	357
280 BS 35	0	32	16	48	0	00.00%	31	14	45
281 BS 35	2	48	34	84	0	00.00%	60	19	79
283 BS 34	10	75	32	117	0	00.00%	77	34	111
301 BS 50	9	163	125	297	0	00.00%	114	178	292
306 BS 50	130	724	519	1373	0	00.00%	535	758	1293
309 BS 39	11	18	10	39	0	00.00%	23	14	37
311 BS 39	21	109	98	228	0	00.00%	33	188	221
314 BS 39	157	566	484	1207	0	00.00%	239	911	1150
315 BS 50	139	547	425	1111	0	00.00%	343	719	1062
316 BS 39	71	235	235	541	0	00.00%	145	376	521
330 BS 48	48	260	157	465	0	00.00%	143	312	455
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	48	69	117
334 BS 63	37	188	121	346	0	00.00%	40	301	341
336 BS 39	218	763	510	1491	0	00.00%	114	1357	1471
338 BS 50	102	562	368	1032	0	00.00%	379	630	1009
340 BS 19	21	94	45	160	0	00.00%	11	144	155
341 BS 19	23	157	143	323	0	00.00%	168	136	304
343 BS 38	30	213	195	438	0	00.00%	172	247	419
345 BS 39	24	113	98	235	0	00.00%	23	210	233
347 BS 38	44	167	118	329	0	00.00%	78	242	320
389 BS 19	13	108	54	175	0	00.00%	58	114	172
391 BS 19	3	10	11	24	0	00.00%	15	8	23
394 BS 38	0	6	8	14	0	00.00%	7	7	14
398 BS 19	3	67	40	110	0	00.00%	53	56	109
399 BS 19	0	0	1	1	0	00.00%	1	0	1
439 BS 46	137	862	427	1426	0	00.00%	987	387	1374
439-1 BS 52	0	14	1	15	0	00.00%	13	2	15
453 BS 72	140	643	483	1266	0	00.00%	884	326	1210
454 BS 66	109	835	498	1442	0	00.00%	943	442	1385
455 BS 55	0	6	5	11	0	00.00%	8	3	11
456 BS 46	155	937	459	1551	0	00.00%	1252	245	1497
457 BS 46	159	1059	613	1831	0	00.00%	1508	268	1776
460 BS 46	143	1424	679	2246	0	00.00%	1814	373	2187
461 BS 46	60	840	539	1439	0	00.00%	1157	240	1397
462 BS 46	66	884	496	1446	0	00.00%	1190	225	1415
464 BS 55	125	654	388	1167	0	00.00%	870	262	1132

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Chief Justice, 14th Court of Appeals District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kem Thompson Frost	DEM Kyle Carter	Totals
471 BS 46	3	49	14	66	0	00.00%	43	20	63
482 BS 60	0	0	0	0	0	00.00%	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1214	463	1677
488 BS 55	38	314	244	596	0	00.00%	446	135	581
490 BS 69	68	504	389	961	0	00.00%	694	236	930
166 BS 57	83	527	423	1033	0	00.00%	723	265	988
167 BS 57	0	3	0	3	0	00.00%	2	1	3
167 BS 77	28	185	90	303	0	00.00%	215	79	294
219 BS 43	10	51	57	118	0	00.00%	32	82	114
219 BS 44	1	8	8	17	0	00.00%	9	8	17
219 BS 45	10	58	48	116	0	00.00%	55	59	114
220 BS 35	12	124	95	231	0	00.00%	154	72	226
220 BS 53	43	435	402	880	0	00.00%	567	286	853
220 BS 54	0	0	2	2	0	00.00%	0	2	2
228 BS 35	0	2	0	2	0	00.00%	2	0	2
232 BS 37	17	94	86	197	0	00.00%	88	100	188
232 BS 67	7	22	11	40	0	00.00%	17	23	40
232 BS 68	38	240	143	421	0	00.00%	185	223	408
277 BS 35	0	0	0	0	0	00.00%	0	0	0
283 BS 35	26	203	104	333	0	00.00%	219	96	315
283 BS 53	20	297	315	632	0	00.00%	396	217	613
330 BS 49	24	161	127	312	0	00.00%	112	192	304
331 BS 48	8	27	18	53	0	00.00%	19	33	52
331 BS 49	6	7	4	17	0	00.00%	10	7	17
331 BS 65	83	394	232	709	0	00.00%	116	572	688
331 BS 64	0	13	7	20	0	00.00%	9	10	19
399 BS 28	2	10	6	18	0	00.00%	10	7	17
399 BS 31	3	22	14	39	0	00.00%	11	26	37
453 BS 73	1	19	7	27	0	00.00%	20	7	27
454 BS 72	1	4	4	9	0	00.00%	4	4	8
455 BS 56	102	356	234	692	0	00.00%	460	200	660
471 BS 66	21	402	266	689	0	00.00%	477	191	668
482 BS 61	2	9	3	14	0	00.00%	12	2	14
482 BS 62	6	16	6	28	0	00.00%	24	4	28
487 BS 66	1	12	7	20	0	00.00%	14	3	17
488 BS 56	43	439	298	780	0	00.00%	555	194	749
490 BS 70	42	222	193	457	0	00.00%	339	110	449
226 BS 34	3	64	21	88	0	00.00%	76	9	85
Totals	5221	35771	23958	64950	0		40551	21955	62506

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 1st Court of Appeals District, Place 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Russell Lloyd	DEM Jim Sharp	Totals
103 BS 39	14	151	83	248	0	00.00%	161	78	239
103 BS 76	9	59	58	126	0	00.00%	75	42	117
104 BS 39	10	164	113	287	0	00.00%	190	83	273
105 BS 39	3	19	13	35	0	00.00%	23	12	35
105-1 BS 50	22	79	79	180	0	00.00%	95	73	168
142 BS 38	63	411	277	751	0	00.00%	382	348	730
144 BS 57	79	465	273	817	0	00.00%	549	239	788
146 BS 38	65	461	331	857	0	00.00%	492	337	829
148 BS 38	132	641	444	1217	0	00.00%	716	461	1177
150 BS 38	50	419	267	736	0	00.00%	422	296	718
151 BS 38	54	542	413	1009	0	00.00%	731	242	973
152 BS 47	149	1196	665	2010	0	00.00%	1487	451	1938
159 BS 38	58	571	421	1050	0	00.00%	699	329	1028
165 BS 41	43	420	384	847	0	00.00%	616	207	823
166 BS 47	2	2	1	5	0	00.00%	3	2	5
167 BS 47	170	953	514	1637	0	00.00%	1214	368	1582
168 BS 39	0	0	0	0	0	00.00%	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	796	267	1063
172 BS 38	14	111	69	194	0	00.00%	128	59	187
192 BS 19	13	99	68	180	0	00.00%	120	53	173
193 BS 47	63	417	364	844	0	00.00%	606	207	813
197 BS 38	18	111	85	214	0	00.00%	146	60	206
218 BS 33	137	675	402	1214	0	00.00%	564	585	1149
219 BS 42	6	115	91	212	0	00.00%	131	71	202
220 BS 34	9	83	46	138	0	00.00%	119	17	136
221 BS 33	87	368	318	773	0	00.00%	539	210	749
223 BS 33	98	460	357	915	0	00.00%	439	408	847
224 BS 33	119	564	415	1098	0	00.00%	491	556	1047
225 BS 35	66	697	429	1192	0	00.00%	900	247	1147
226 BS 35	58	348	281	687	0	00.00%	390	269	659
227 BS 34	82	608	329	1019	0	00.00%	713	228	941
228 BS 34	69	747	417	1233	0	00.00%	928	254	1182
232 BS 33	1	0	0	1	0	00.00%	1	0	1
232-3 BS 37	10	122	53	185	0	00.00%	156	25	181
258 BS 34	43	410	304	757	0	00.00%	559	165	724
263 BS 58	93	1140	770	2003	0	00.00%	1495	462	1957
274 BS 33	22	106	198	326	0	00.00%	238	78	316
275 BS 33	27	61	55	143	0	00.00%	105	32	137
276 BS 33	70	381	313	764	0	00.00%	405	305	710
277 BS 34	44	533	262	839	0	00.00%	604	191	795

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 1st Court of Appeals District, Place 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Russell Lloyd	DEM Jim Sharp	Totals
278 BS 34	64	549	329	942	0	00.00%	664	229	893
279 BS 34	21	201	148	370	0	00.00%	288	67	355
280 BS 35	0	32	16	48	0	00.00%	31	14	45
281 BS 35	2	48	34	84	0	00.00%	59	20	79
283 BS 34	10	75	32	117	0	00.00%	78	34	112
301 BS 50	9	163	125	297	0	00.00%	111	177	288
306 BS 50	130	724	519	1373	0	00.00%	527	775	1302
309 BS 39	11	18	10	39	0	00.00%	23	15	38
311 BS 39	21	109	98	228	0	00.00%	29	190	219
314 BS 39	157	566	484	1207	0	00.00%	232	920	1152
315 BS 50	139	547	425	1111	0	00.00%	320	741	1061
316 BS 39	71	235	235	541	0	00.00%	138	384	522
330 BS 48	48	260	157	465	0	00.00%	146	308	454
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	47	70	117
334 BS 63	37	188	121	346	0	00.00%	40	303	343
336 BS 39	218	763	510	1491	0	00.00%	111	1357	1468
338 BS 50	102	562	368	1032	0	00.00%	372	639	1011
340 BS 19	21	94	45	160	0	00.00%	11	144	155
341 BS 19	23	157	143	323	0	00.00%	161	145	306
343 BS 38	30	213	195	438	0	00.00%	169	251	420
345 BS 39	24	113	98	235	0	00.00%	23	211	234
347 BS 38	44	167	118	329	0	00.00%	80	241	321
389 BS 19	13	108	54	175	0	00.00%	59	113	172
391 BS 19	3	10	11	24	0	00.00%	16	7	23
394 BS 38	0	6	8	14	0	00.00%	7	7	14
398 BS 19	3	67	40	110	0	00.00%	52	56	108
399 BS 19	0	0	1	1	0	00.00%	1	0	1
439 BS 46	137	862	427	1426	0	00.00%	982	395	1377
439-1 BS 52	0	14	1	15	0	00.00%	13	2	15
453 BS 72	140	643	483	1266	0	00.00%	880	331	1211
454 BS 66	109	835	498	1442	0	00.00%	951	435	1386
455 BS 55	0	6	5	11	0	00.00%	8	3	11
456 BS 46	155	937	459	1551	0	00.00%	1238	260	1498
457 BS 46	159	1059	613	1831	0	00.00%	1498	287	1785
460 BS 46	143	1424	679	2246	0	00.00%	1801	389	2190
461 BS 46	60	840	539	1439	0	00.00%	1150	253	1403
462 BS 46	66	884	496	1446	0	00.00%	1178	238	1416
464 BS 55	125	654	388	1167	0	00.00%	854	280	1134

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 1st Court of Appeals District, Place 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Russell Lloyd	DEM Jim Sharp	Totals
471 BS 46	3	49	14	66	0	00.00%	46	18	64
482 BS 60	0	0	0	0	0	00.00%	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1196	478	1674
488 BS 55	38	314	244	596	0	00.00%	444	136	580
490 BS 69	68	504	389	961	0	00.00%	691	243	934
166 BS 57	83	527	423	1033	0	00.00%	716	274	990
167 BS 57	0	3	0	3	0	00.00%	2	1	3
167 BS 77	28	185	90	303	0	00.00%	209	85	294
219 BS 43	10	51	57	118	0	00.00%	31	83	114
219 BS 44	1	8	8	17	0	00.00%	9	8	17
219 BS 45	10	58	48	116	0	00.00%	56	58	114
220 BS 35	12	124	95	231	0	00.00%	147	80	227
220 BS 53	43	435	402	880	0	00.00%	557	294	851
220 BS 54	0	0	2	2	0	00.00%	0	2	2
228 BS 35	0	2	0	2	0	00.00%	2	0	2
232 BS 37	17	94	86	197	0	00.00%	88	99	187
232 BS 67	7	22	11	40	0	00.00%	15	24	39
232 BS 68	38	240	143	421	0	00.00%	184	228	412
277 BS 35	0	0	0	0	0	00.00%	0	0	0
283 BS 35	26	203	104	333	0	00.00%	214	102	316
283 BS 53	20	297	315	632	0	00.00%	391	223	614
330 BS 49	24	161	127	312	0	00.00%	113	190	303
331 BS 48	8	27	18	53	0	00.00%	17	35	52
331 BS 49	6	7	4	17	0	00.00%	9	8	17
331 BS 65	83	394	232	709	0	00.00%	114	575	689
331 BS 64	0	13	7	20	0	00.00%	9	10	19
399 BS 28	2	10	6	18	0	00.00%	9	7	16
399 BS 31	3	22	14	39	0	00.00%	11	26	37
453 BS 73	1	19	7	27	0	00.00%	19	8	27
454 BS 72	1	4	4	9	0	00.00%	4	4	8
455 BS 56	102	356	234	692	0	00.00%	457	205	662
471 BS 66	21	402	266	689	0	00.00%	470	197	667
482 BS 61	2	9	3	14	0	00.00%	11	3	14
482 BS 62	6	16	6	28	0	00.00%	24	4	28
487 BS 66	1	12	7	20	0	00.00%	15	3	18
488 BS 56	43	439	298	780	0	00.00%	552	201	753
490 BS 70	42	222	193	457	0	00.00%	330	118	448
226 BS 34	3	64	21	88	0	00.00%	73	11	84
Totals	5221	35771	23958	64950	0		40011	22649	62660

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 1st Court of Appeals District, Place 5

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Laura Carter Higley	Totals
103 BS 39	14	151	83	248	0	00.00%	179	179
103 BS 76	9	59	58	126	0	00.00%	93	93
104 BS 39	10	164	113	287	0	00.00%	213	213
105 BS 39	3	19	13	35	0	00.00%	29	29
105-1 BS 50	22	79	79	180	0	00.00%	105	105
142 BS 38	63	411	277	751	0	00.00%	450	450
144 BS 57	79	465	273	817	0	00.00%	599	599
146 BS 38	65	461	331	857	0	00.00%	569	569
148 BS 38	132	641	444	1217	0	00.00%	802	802
150 BS 38	50	419	267	736	0	00.00%	472	472
151 BS 38	54	542	413	1009	0	00.00%	782	782
152 BS 47	149	1196	665	2010	0	00.00%	1604	1604
159 BS 38	58	571	421	1050	0	00.00%	762	762
165 BS 41	43	420	384	847	0	00.00%	661	661
166 BS 47	2	2	1	5	0	00.00%	5	5
167 BS 47	170	953	514	1637	0	00.00%	1310	1310
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	871	871
172 BS 38	14	111	69	194	0	00.00%	138	138
192 BS 19	13	99	68	180	0	00.00%	130	130
193 BS 47	63	417	364	844	0	00.00%	657	657
197 BS 38	18	111	85	214	0	00.00%	163	163
218 BS 33	137	675	402	1214	0	00.00%	692	692
219 BS 42	6	115	91	212	0	00.00%	140	140
220 BS 34	9	83	46	138	0	00.00%	124	124
221 BS 33	87	368	318	773	0	00.00%	579	579
223 BS 33	98	460	357	915	0	00.00%	525	525
224 BS 33	119	564	415	1098	0	00.00%	613	613
225 BS 35	66	697	429	1192	0	00.00%	944	944
226 BS 35	58	348	281	687	0	00.00%	447	447
227 BS 34	82	608	329	1019	0	00.00%	772	772
228 BS 34	69	747	417	1233	0	00.00%	987	987
232 BS 33	1	0	0	1	0	00.00%	1	1
232-3 BS 37	10	122	53	185	0	00.00%	158	158
258 BS 34	43	410	304	757	0	00.00%	601	601
263 BS 58	93	1140	770	2003	0	00.00%	1602	1602
274 BS 33	22	106	198	326	0	00.00%	249	249
275 BS 33	27	61	55	143	0	00.00%	110	110
276 BS 33	70	381	313	764	0	00.00%	478	478
277 BS 34	44	533	262	839	0	00.00%	659	659

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 1st Court of Appeals District, Place 5

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Laura Carter Higley	Totals
278 BS 34	64	549	329	942	0	00.00%	730	730
279 BS 34	21	201	148	370	0	00.00%	311	311
280 BS 35	0	32	16	48	0	00.00%	29	29
281 BS 35	2	48	34	84	0	00.00%	62	62
283 BS 34	10	75	32	117	0	00.00%	84	84
301 BS 50	9	163	125	297	0	00.00%	140	140
306 BS 50	130	724	519	1373	0	00.00%	661	661
309 BS 39	11	18	10	39	0	00.00%	22	22
311 BS 39	21	109	98	228	0	00.00%	44	44
314 BS 39	157	566	484	1207	0	00.00%	325	325
315 BS 50	139	547	425	1111	0	00.00%	434	434
316 BS 39	71	235	235	541	0	00.00%	200	200
330 BS 48	48	260	157	465	0	00.00%	174	174
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	56	56
334 BS 63	37	188	121	346	0	00.00%	63	63
336 BS 39	218	763	510	1491	0	00.00%	187	187
338 BS 50	102	562	368	1032	0	00.00%	444	444
340 BS 19	21	94	45	160	0	00.00%	17	17
341 BS 19	23	157	143	323	0	00.00%	190	190
343 BS 38	30	213	195	438	0	00.00%	202	202
345 BS 39	24	113	98	235	0	00.00%	34	34
347 BS 38	44	167	118	329	0	00.00%	103	103
389 BS 19	13	108	54	175	0	00.00%	64	64
391 BS 19	3	10	11	24	0	00.00%	16	16
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	64	64
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1035	1035
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	959	959
454 BS 66	109	835	498	1442	0	00.00%	1045	1045
455 BS 55	0	6	5	11	0	00.00%	8	8
456 BS 46	155	937	459	1551	0	00.00%	1291	1291
457 BS 46	159	1059	613	1831	0	00.00%	1572	1572
460 BS 46	143	1424	679	2246	0	00.00%	1884	1884
461 BS 46	60	840	539	1439	0	00.00%	1202	1202
462 BS 46	66	884	496	1446	0	00.00%	1231	1231
464 BS 55	125	654	388	1167	0	00.00%	924	924

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 1st Court of Appeals District, Place 5

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Laura Carter Higley	Totals
471 BS 46	3	49	14	66	0	00.00%	48	48
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1318	1318
488 BS 55	38	314	244	596	0	00.00%	486	486
490 BS 69	68	504	389	961	0	00.00%	765	765
166 BS 57	83	527	423	1033	0	00.00%	765	765
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	224	224
219 BS 43	10	51	57	118	0	00.00%	36	36
219 BS 44	1	8	8	17	0	00.00%	10	10
219 BS 45	10	58	48	116	0	00.00%	63	63
220 BS 35	12	124	95	231	0	00.00%	170	170
220 BS 53	43	435	402	880	0	00.00%	610	610
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	103	103
232 BS 67	7	22	11	40	0	00.00%	21	21
232 BS 68	38	240	143	421	0	00.00%	209	209
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	236	236
283 BS 53	20	297	315	632	0	00.00%	452	452
330 BS 49	24	161	127	312	0	00.00%	131	131
331 BS 48	8	27	18	53	0	00.00%	23	23
331 BS 49	6	7	4	17	0	00.00%	10	10
331 BS 65	83	394	232	709	0	00.00%	172	172
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	11	11
399 BS 31	3	22	14	39	0	00.00%	12	12
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	6	6
455 BS 56	102	356	234	692	0	00.00%	493	493
471 BS 66	21	402	266	689	0	00.00%	509	509
482 BS 61	2	9	3	14	0	00.00%	12	12
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	594	594
490 BS 70	42	222	193	457	0	00.00%	361	361
226 BS 34	3	64	21	88	0	00.00%	78	78
Totals	5221	35771	23958	64950	0		44107	44107

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 14th Court of Appeals District, Place 4-Unexpired Term

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Marc Brown	Totals
103 BS 39	14	151	83	248	0	00.00%	178	178
103 BS 76	9	59	58	126	0	00.00%	93	93
104 BS 39	10	164	113	287	0	00.00%	207	207
105 BS 39	3	19	13	35	0	00.00%	28	28
105-1 BS 50	22	79	79	180	0	00.00%	104	104
142 BS 38	63	411	277	751	0	00.00%	448	448
144 BS 57	79	465	273	817	0	00.00%	597	597
146 BS 38	65	461	331	857	0	00.00%	562	562
148 BS 38	132	641	444	1217	0	00.00%	802	802
150 BS 38	50	419	267	736	0	00.00%	471	471
151 BS 38	54	542	413	1009	0	00.00%	783	783
152 BS 47	149	1196	665	2010	0	00.00%	1602	1602
159 BS 38	58	571	421	1050	0	00.00%	760	760
165 BS 41	43	420	384	847	0	00.00%	654	654
166 BS 47	2	2	1	5	0	00.00%	5	5
167 BS 47	170	953	514	1637	0	00.00%	1311	1311
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	864	864
172 BS 38	14	111	69	194	0	00.00%	137	137
192 BS 19	13	99	68	180	0	00.00%	128	128
193 BS 47	63	417	364	844	0	00.00%	657	657
197 BS 38	18	111	85	214	0	00.00%	162	162
218 BS 33	137	675	402	1214	0	00.00%	693	693
219 BS 42	6	115	91	212	0	00.00%	137	137
220 BS 34	9	83	46	138	0	00.00%	124	124
221 BS 33	87	368	318	773	0	00.00%	576	576
223 BS 33	98	460	357	915	0	00.00%	523	523
224 BS 33	119	564	415	1098	0	00.00%	606	606
225 BS 35	66	697	429	1192	0	00.00%	939	939
226 BS 35	58	348	281	687	0	00.00%	447	447
227 BS 34	82	608	329	1019	0	00.00%	771	771
228 BS 34	69	747	417	1233	0	00.00%	982	982
232 BS 33	1	0	0	1	0	00.00%	1	1
232-3 BS 37	10	122	53	185	0	00.00%	157	157
258 BS 34	43	410	304	757	0	00.00%	591	591
263 BS 58	93	1140	770	2003	0	00.00%	1604	1604
274 BS 33	22	106	198	326	0	00.00%	249	249
275 BS 33	27	61	55	143	0	00.00%	108	108
276 BS 33	70	381	313	764	0	00.00%	478	478
277 BS 34	44	533	262	839	0	00.00%	659	659

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 14th Court of Appeals District, Place 4-Unexpired Term

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Marc Brown	Totals
278 BS 34	64	549	329	942	0	00.00%	725	725
279 BS 34	21	201	148	370	0	00.00%	308	308
280 BS 35	0	32	16	48	0	00.00%	29	29
281 BS 35	2	48	34	84	0	00.00%	62	62
283 BS 34	10	75	32	117	0	00.00%	83	83
301 BS 50	9	163	125	297	0	00.00%	141	141
306 BS 50	130	724	519	1373	0	00.00%	658	658
309 BS 39	11	18	10	39	0	00.00%	22	22
311 BS 39	21	109	98	228	0	00.00%	45	45
314 BS 39	157	566	484	1207	0	00.00%	319	319
315 BS 50	139	547	425	1111	0	00.00%	429	429
316 BS 39	71	235	235	541	0	00.00%	196	196
330 BS 48	48	260	157	465	0	00.00%	173	173
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	56	56
334 BS 63	37	188	121	346	0	00.00%	64	64
336 BS 39	218	763	510	1491	0	00.00%	186	186
338 BS 50	102	562	368	1032	0	00.00%	442	442
340 BS 19	21	94	45	160	0	00.00%	16	16
341 BS 19	23	157	143	323	0	00.00%	191	191
343 BS 38	30	213	195	438	0	00.00%	201	201
345 BS 39	24	113	98	235	0	00.00%	35	35
347 BS 38	44	167	118	329	0	00.00%	101	101
389 BS 19	13	108	54	175	0	00.00%	63	63
391 BS 19	3	10	11	24	0	00.00%	15	15
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	65	65
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1041	1041
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	956	956
454 BS 66	109	835	498	1442	0	00.00%	1044	1044
455 BS 55	0	6	5	11	0	00.00%	7	7
456 BS 46	155	937	459	1551	0	00.00%	1298	1298
457 BS 46	159	1059	613	1831	0	00.00%	1563	1563
460 BS 46	143	1424	679	2246	0	00.00%	1882	1882
461 BS 46	60	840	539	1439	0	00.00%	1202	1202
462 BS 46	66	884	496	1446	0	00.00%	1230	1230
464 BS 55	125	654	388	1167	0	00.00%	920	920

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 14th Court of Appeals District, Place 4-Unexpired Term

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Marc Brown	Totals
471 BS 46	3	49	14	66	0	00.00%	49	49
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1317	1317
488 BS 55	38	314	244	596	0	00.00%	485	485
490 BS 69	68	504	389	961	0	00.00%	763	763
166 BS 57	83	527	423	1033	0	00.00%	761	761
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	225	225
219 BS 43	10	51	57	118	0	00.00%	35	35
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	62	62
220 BS 35	12	124	95	231	0	00.00%	168	168
220 BS 53	43	435	402	880	0	00.00%	609	609
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	103	103
232 BS 67	7	22	11	40	0	00.00%	21	21
232 BS 68	38	240	143	421	0	00.00%	213	213
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	237	237
283 BS 53	20	297	315	632	0	00.00%	446	446
330 BS 49	24	161	127	312	0	00.00%	130	130
331 BS 48	8	27	18	53	0	00.00%	22	22
331 BS 49	6	7	4	17	0	00.00%	10	10
331 BS 65	83	394	232	709	0	00.00%	169	169
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	10	10
399 BS 31	3	22	14	39	0	00.00%	12	12
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	6	6
455 BS 56	102	356	234	692	0	00.00%	495	495
471 BS 66	21	402	266	689	0	00.00%	508	508
482 BS 61	2	9	3	14	0	00.00%	13	13
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	592	592
490 BS 70	42	222	193	457	0	00.00%	361	361
226 BS 34	3	64	21	88	0	00.00%	78	78
Totals	5221	35771	23958	64950	0		43974	43974

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 14th Court of Appeals District, Place 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Ken Wise	DEM Gordon Goodman	Totals
103 BS 39	14	151	83	248	0	00.00%	165	71	236
103 BS 76	9	59	58	126	0	00.00%	81	35	116
104 BS 39	10	164	113	287	0	00.00%	190	78	268
105 BS 39	3	19	13	35	0	00.00%	25	10	35
105-1 BS 50	22	79	79	180	0	00.00%	98	66	164
142 BS 38	63	411	277	751	0	00.00%	402	325	727
144 BS 57	79	465	273	817	0	00.00%	563	226	789
146 BS 38	65	461	331	857	0	00.00%	492	324	816
148 BS 38	132	641	444	1217	0	00.00%	743	425	1168
150 BS 38	50	419	267	736	0	00.00%	436	279	715
151 BS 38	54	542	413	1009	0	00.00%	729	240	969
152 BS 47	149	1196	665	2010	0	00.00%	1512	413	1925
159 BS 38	58	571	421	1050	0	00.00%	716	306	1022
165 BS 41	43	420	384	847	0	00.00%	623	200	823
166 BS 47	2	2	1	5	0	00.00%	3	2	5
167 BS 47	170	953	514	1637	0	00.00%	1242	337	1579
168 BS 39	0	0	0	0	0	00.00%	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	812	248	1060
172 BS 38	14	111	69	194	0	00.00%	131	56	187
192 BS 19	13	99	68	180	0	00.00%	122	50	172
193 BS 47	63	417	364	844	0	00.00%	612	192	804
197 BS 38	18	111	85	214	0	00.00%	150	57	207
218 BS 33	137	675	402	1214	0	00.00%	601	533	1134
219 BS 42	6	115	91	212	0	00.00%	133	69	202
220 BS 34	9	83	46	138	0	00.00%	121	15	136
221 BS 33	87	368	318	773	0	00.00%	547	197	744
223 BS 33	98	460	357	915	0	00.00%	469	367	836
224 BS 33	119	564	415	1098	0	00.00%	534	495	1029
225 BS 35	66	697	429	1192	0	00.00%	913	225	1138
226 BS 35	58	348	281	687	0	00.00%	414	241	655
227 BS 34	82	608	329	1019	0	00.00%	739	198	937
228 BS 34	69	747	417	1233	0	00.00%	943	230	1173
232 BS 33	1	0	0	1	0	00.00%	1	0	1
232-3 BS 37	10	122	53	185	0	00.00%	153	25	178
258 BS 34	43	410	304	757	0	00.00%	578	145	723
263 BS 58	93	1140	770	2003	0	00.00%	1506	452	1958
274 BS 33	22	106	198	326	0	00.00%	241	76	317
275 BS 33	27	61	55	143	0	00.00%	108	29	137
276 BS 33	70	381	313	764	0	00.00%	429	276	705
277 BS 34	44	533	262	839	0	00.00%	631	164	795

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 14th Court of Appeals District, Place 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Ken Wise	DEM Gordon Goodman	Totals
278 BS 34	64	549	329	942	0	00.00%	688	194	882
279 BS 34	21	201	148	370	0	00.00%	299	58	357
280 BS 35	0	32	16	48	0	00.00%	31	14	45
281 BS 35	2	48	34	84	0	00.00%	63	18	81
283 BS 34	10	75	32	117	0	00.00%	80	33	113
301 BS 50	9	163	125	297	0	00.00%	115	172	287
306 BS 50	130	724	519	1373	0	00.00%	543	744	1287
309 BS 39	11	18	10	39	0	00.00%	23	12	35
311 BS 39	21	109	98	228	0	00.00%	30	189	219
314 BS 39	157	566	484	1207	0	00.00%	247	900	1147
315 BS 50	139	547	425	1111	0	00.00%	348	711	1059
316 BS 39	71	235	235	541	0	00.00%	143	375	518
330 BS 48	48	260	157	465	0	00.00%	147	309	456
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	49	68	117
334 BS 63	37	188	121	346	0	00.00%	41	300	341
336 BS 39	218	763	510	1491	0	00.00%	110	1354	1464
338 BS 50	102	562	368	1032	0	00.00%	380	626	1006
340 BS 19	21	94	45	160	0	00.00%	11	145	156
341 BS 19	23	157	143	323	0	00.00%	167	138	305
343 BS 38	30	213	195	438	0	00.00%	173	245	418
345 BS 39	24	113	98	235	0	00.00%	24	209	233
347 BS 38	44	167	118	329	0	00.00%	78	241	319
389 BS 19	13	108	54	175	0	00.00%	61	111	172
391 BS 19	3	10	11	24	0	00.00%	15	8	23
394 BS 38	0	6	8	14	0	00.00%	7	7	14
398 BS 19	3	67	40	110	0	00.00%	53	56	109
399 BS 19	0	0	1	1	0	00.00%	1	0	1
439 BS 46	137	862	427	1426	0	00.00%	997	375	1372
439-1 BS 52	0	14	1	15	0	00.00%	13	2	15
453 BS 72	140	643	483	1266	0	00.00%	895	318	1213
454 BS 66	109	835	498	1442	0	00.00%	958	417	1375
455 BS 55	0	6	5	11	0	00.00%	8	3	11
456 BS 46	155	937	459	1551	0	00.00%	1253	242	1495
457 BS 46	159	1059	613	1831	0	00.00%	1514	263	1777
460 BS 46	143	1424	679	2246	0	00.00%	1834	355	2189
461 BS 46	60	840	539	1439	0	00.00%	1163	235	1398
462 BS 46	66	884	496	1446	0	00.00%	1190	218	1408
464 BS 55	125	654	388	1167	0	00.00%	876	256	1132

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice, 14th Court of Appeals District, Place 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Ken Wise	DEM Gordon Goodman	Totals
471 BS 46	3	49	14	66	0	00.00%	44	19	63
482 BS 60	0	0	0	0	0	00.00%	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1226	444	1670
488 BS 55	38	314	244	596	0	00.00%	451	128	579
490 BS 69	68	504	389	961	0	00.00%	696	237	933
166 BS 57	83	527	423	1033	0	00.00%	725	264	989
167 BS 57	0	3	0	3	0	00.00%	2	1	3
167 BS 77	28	185	90	303	0	00.00%	210	83	293
219 BS 43	10	51	57	118	0	00.00%	31	83	114
219 BS 44	1	8	8	17	0	00.00%	9	8	17
219 BS 45	10	58	48	116	0	00.00%	57	56	113
220 BS 35	12	124	95	231	0	00.00%	153	74	227
220 BS 53	43	435	402	880	0	00.00%	565	283	848
220 BS 54	0	0	2	2	0	00.00%	0	2	2
228 BS 35	0	2	0	2	0	00.00%	2	0	2
232 BS 37	17	94	86	197	0	00.00%	87	99	186
232 BS 67	7	22	11	40	0	00.00%	17	23	40
232 BS 68	38	240	143	421	0	00.00%	196	210	406
277 BS 35	0	0	0	0	0	00.00%	0	0	0
283 BS 35	26	203	104	333	0	00.00%	223	91	314
283 BS 53	20	297	315	632	0	00.00%	397	215	612
330 BS 49	24	161	127	312	0	00.00%	119	184	303
331 BS 48	8	27	18	53	0	00.00%	19	33	52
331 BS 49	6	7	4	17	0	00.00%	9	8	17
331 BS 65	83	394	232	709	0	00.00%	118	571	689
331 BS 64	0	13	7	20	0	00.00%	10	9	19
399 BS 28	2	10	6	18	0	00.00%	9	7	16
399 BS 31	3	22	14	39	0	00.00%	12	25	37
453 BS 73	1	19	7	27	0	00.00%	19	7	26
454 BS 72	1	4	4	9	0	00.00%	4	4	8
455 BS 56	102	356	234	692	0	00.00%	466	195	661
471 BS 66	21	402	266	689	0	00.00%	487	179	666
482 BS 61	2	9	3	14	0	00.00%	12	2	14
482 BS 62	6	16	6	28	0	00.00%	23	4	27
487 BS 66	1	12	7	20	0	00.00%	15	3	18
488 BS 56	43	439	298	780	0	00.00%	559	194	753
490 BS 70	42	222	193	457	0	00.00%	343	106	449
226 BS 34	3	64	21	88	0	00.00%	76	8	84
Totals	5221	35771	23958	64950	0		40927	21457	62384

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Judge, 122nd Judicial District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John Ellisor	Totals
103 BS 39	14	151	83	248	0	00.00%	181	181
103 BS 76	9	59	58	126	0	00.00%	92	92
104 BS 39	10	164	113	287	0	00.00%	208	208
105 BS 39	3	19	13	35	0	00.00%	29	29
105-1 BS 50	22	79	79	180	0	00.00%	112	112
142 BS 38	63	411	277	751	0	00.00%	450	450
144 BS 57	79	465	273	817	0	00.00%	597	597
146 BS 38	65	461	331	857	0	00.00%	576	576
148 BS 38	132	641	444	1217	0	00.00%	832	832
150 BS 38	50	419	267	736	0	00.00%	492	492
151 BS 38	54	542	413	1009	0	00.00%	788	788
152 BS 47	149	1196	665	2010	0	00.00%	1608	1608
159 BS 38	58	571	421	1050	0	00.00%	767	767
165 BS 41	43	420	384	847	0	00.00%	665	665
166 BS 47	2	2	1	5	0	00.00%	4	4
167 BS 47	170	953	514	1637	0	00.00%	1315	1315
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	868	868
172 BS 38	14	111	69	194	0	00.00%	141	141
192 BS 19	13	99	68	180	0	00.00%	129	129
193 BS 47	63	417	364	844	0	00.00%	653	653
197 BS 38	18	111	85	214	0	00.00%	164	164
218 BS 33	137	675	402	1214	0	00.00%	736	736
219 BS 42	6	115	91	212	0	00.00%	143	143
220 BS 34	9	83	46	138	0	00.00%	127	127
221 BS 33	87	368	318	773	0	00.00%	587	587
223 BS 33	98	460	357	915	0	00.00%	570	570
224 BS 33	119	564	415	1098	0	00.00%	666	666
225 BS 35	66	697	429	1192	0	00.00%	955	955
226 BS 35	58	348	281	687	0	00.00%	456	456
227 BS 34	82	608	329	1019	0	00.00%	791	791
228 BS 34	69	747	417	1233	0	00.00%	1003	1003
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	159	159
258 BS 34	43	410	304	757	0	00.00%	606	606
263 BS 58	93	1140	770	2003	0	00.00%	1609	1609
274 BS 33	22	106	198	326	0	00.00%	252	252
275 BS 33	27	61	55	143	0	00.00%	107	107
276 BS 33	70	381	313	764	0	00.00%	503	503
277 BS 34	44	533	262	839	0	00.00%	666	666

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Judge, 122nd Judicial District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John Ellisor	Totals
278 BS 34	64	549	329	942	0	00.00%	740	740
279 BS 34	21	201	148	370	0	00.00%	316	316
280 BS 35	0	32	16	48	0	00.00%	30	30
281 BS 35	2	48	34	84	0	00.00%	63	63
283 BS 34	10	75	32	117	0	00.00%	83	83
301 BS 50	9	163	125	297	0	00.00%	141	141
306 BS 50	130	724	519	1373	0	00.00%	686	686
309 BS 39	11	18	10	39	0	00.00%	28	28
311 BS 39	21	109	98	228	0	00.00%	46	46
314 BS 39	157	566	484	1207	0	00.00%	351	351
315 BS 50	139	547	425	1111	0	00.00%	444	444
316 BS 39	71	235	235	541	0	00.00%	213	213
330 BS 48	48	260	157	465	0	00.00%	176	176
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	61	61
334 BS 63	37	188	121	346	0	00.00%	67	67
336 BS 39	218	763	510	1491	0	00.00%	194	194
338 BS 50	102	562	368	1032	0	00.00%	460	460
340 BS 19	21	94	45	160	0	00.00%	16	16
341 BS 19	23	157	143	323	0	00.00%	196	196
343 BS 38	30	213	195	438	0	00.00%	208	208
345 BS 39	24	113	98	235	0	00.00%	35	35
347 BS 38	44	167	118	329	0	00.00%	107	107
389 BS 19	13	108	54	175	0	00.00%	64	64
391 BS 19	3	10	11	24	0	00.00%	15	15
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	64	64
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1044	1044
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	968	968
454 BS 66	109	835	498	1442	0	00.00%	1048	1048
455 BS 55	0	6	5	11	0	00.00%	7	7
456 BS 46	155	937	459	1551	0	00.00%	1309	1309
457 BS 46	159	1059	613	1831	0	00.00%	1567	1567
460 BS 46	143	1424	679	2246	0	00.00%	1911	1911
461 BS 46	60	840	539	1439	0	00.00%	1212	1212
462 BS 46	66	884	496	1446	0	00.00%	1242	1242
464 BS 55	125	654	388	1167	0	00.00%	939	939

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Judge, 122nd Judicial District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John Ellisor	Totals
471 BS 46	3	49	14	66	0	00.00%	48	48
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1325	1325
488 BS 55	38	314	244	596	0	00.00%	487	487
490 BS 69	68	504	389	961	0	00.00%	764	764
166 BS 57	83	527	423	1033	0	00.00%	766	766
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	226	226
219 BS 43	10	51	57	118	0	00.00%	38	38
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	65	65
220 BS 35	12	124	95	231	0	00.00%	169	169
220 BS 53	43	435	402	880	0	00.00%	617	617
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	105	105
232 BS 67	7	22	11	40	0	00.00%	20	20
232 BS 68	38	240	143	421	0	00.00%	216	216
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	238	238
283 BS 53	20	297	315	632	0	00.00%	449	449
330 BS 49	24	161	127	312	0	00.00%	137	137
331 BS 48	8	27	18	53	0	00.00%	21	21
331 BS 49	6	7	4	17	0	00.00%	10	10
331 BS 65	83	394	232	709	0	00.00%	186	186
331 BS 64	0	13	7	20	0	00.00%	10	10
399 BS 28	2	10	6	18	0	00.00%	11	11
399 BS 31	3	22	14	39	0	00.00%	12	12
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	5	5
455 BS 56	102	356	234	692	0	00.00%	499	499
471 BS 66	21	402	266	689	0	00.00%	507	507
482 BS 61	2	9	3	14	0	00.00%	13	13
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	595	595
490 BS 70	42	222	193	457	0	00.00%	361	361
226 BS 34	3	64	21	88	0	00.00%	78	78
Totals	5221	35771	23958	64950	0		44733	44733

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Judge, 212th Judicial District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Patricia Grady	Totals
103 BS 39	14	151	83	248	0	00.00%	180	180
103 BS 76	9	59	58	126	0	00.00%	91	91
104 BS 39	10	164	113	287	0	00.00%	218	218
105 BS 39	3	19	13	35	0	00.00%	30	30
105-1 BS 50	22	79	79	180	0	00.00%	108	108
142 BS 38	63	411	277	751	0	00.00%	451	451
144 BS 57	79	465	273	817	0	00.00%	591	591
146 BS 38	65	461	331	857	0	00.00%	578	578
148 BS 38	132	641	444	1217	0	00.00%	825	825
150 BS 38	50	419	267	736	0	00.00%	484	484
151 BS 38	54	542	413	1009	0	00.00%	789	789
152 BS 47	149	1196	665	2010	0	00.00%	1611	1611
159 BS 38	58	571	421	1050	0	00.00%	765	765
165 BS 41	43	420	384	847	0	00.00%	664	664
166 BS 47	2	2	1	5	0	00.00%	5	5
167 BS 47	170	953	514	1637	0	00.00%	1310	1310
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	870	870
172 BS 38	14	111	69	194	0	00.00%	141	141
192 BS 19	13	99	68	180	0	00.00%	128	128
193 BS 47	63	417	364	844	0	00.00%	657	657
197 BS 38	18	111	85	214	0	00.00%	162	162
218 BS 33	137	675	402	1214	0	00.00%	734	734
219 BS 42	6	115	91	212	0	00.00%	145	145
220 BS 34	9	83	46	138	0	00.00%	123	123
221 BS 33	87	368	318	773	0	00.00%	583	583
223 BS 33	98	460	357	915	0	00.00%	560	560
224 BS 33	119	564	415	1098	0	00.00%	654	654
225 BS 35	66	697	429	1192	0	00.00%	957	957
226 BS 35	58	348	281	687	0	00.00%	460	460
227 BS 34	82	608	329	1019	0	00.00%	794	794
228 BS 34	69	747	417	1233	0	00.00%	991	991
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	159	159
258 BS 34	43	410	304	757	0	00.00%	608	608
263 BS 58	93	1140	770	2003	0	00.00%	1607	1607
274 BS 33	22	106	198	326	0	00.00%	255	255
275 BS 33	27	61	55	143	0	00.00%	108	108
276 BS 33	70	381	313	764	0	00.00%	500	500
277 BS 34	44	533	262	839	0	00.00%	662	662

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Judge, 212th Judicial District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Patricia Grady	Totals
278 BS 34	64	549	329	942	0	00.00%	736	736
279 BS 34	21	201	148	370	0	00.00%	310	310
280 BS 35	0	32	16	48	0	00.00%	30	30
281 BS 35	2	48	34	84	0	00.00%	64	64
283 BS 34	10	75	32	117	0	00.00%	86	86
301 BS 50	9	163	125	297	0	00.00%	143	143
306 BS 50	130	724	519	1373	0	00.00%	688	688
309 BS 39	11	18	10	39	0	00.00%	23	23
311 BS 39	21	109	98	228	0	00.00%	46	46
314 BS 39	157	566	484	1207	0	00.00%	333	333
315 BS 50	139	547	425	1111	0	00.00%	446	446
316 BS 39	71	235	235	541	0	00.00%	213	213
330 BS 48	48	260	157	465	0	00.00%	176	176
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	61	61
334 BS 63	37	188	121	346	0	00.00%	68	68
336 BS 39	218	763	510	1491	0	00.00%	198	198
338 BS 50	102	562	368	1032	0	00.00%	453	453
340 BS 19	21	94	45	160	0	00.00%	18	18
341 BS 19	23	157	143	323	0	00.00%	192	192
343 BS 38	30	213	195	438	0	00.00%	206	206
345 BS 39	24	113	98	235	0	00.00%	37	37
347 BS 38	44	167	118	329	0	00.00%	107	107
389 BS 19	13	108	54	175	0	00.00%	64	64
391 BS 19	3	10	11	24	0	00.00%	14	14
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	62	62
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1042	1042
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	973	973
454 BS 66	109	835	498	1442	0	00.00%	1044	1044
455 BS 55	0	6	5	11	0	00.00%	7	7
456 BS 46	155	937	459	1551	0	00.00%	1302	1302
457 BS 46	159	1059	613	1831	0	00.00%	1563	1563
460 BS 46	143	1424	679	2246	0	00.00%	1893	1893
461 BS 46	60	840	539	1439	0	00.00%	1201	1201
462 BS 46	66	884	496	1446	0	00.00%	1229	1229
464 BS 55	125	654	388	1167	0	00.00%	937	937

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Judge, 212th Judicial District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Patricia Grady	Totals
471 BS 46	3	49	14	66	0	00.00%	46	46
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1323	1323
488 BS 55	38	314	244	596	0	00.00%	489	489
490 BS 69	68	504	389	961	0	00.00%	762	762
166 BS 57	83	527	423	1033	0	00.00%	768	768
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	225	225
219 BS 43	10	51	57	118	0	00.00%	36	36
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	65	65
220 BS 35	12	124	95	231	0	00.00%	169	169
220 BS 53	43	435	402	880	0	00.00%	618	618
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	108	108
232 BS 67	7	22	11	40	0	00.00%	22	22
232 BS 68	38	240	143	421	0	00.00%	223	223
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	239	239
283 BS 53	20	297	315	632	0	00.00%	451	451
330 BS 49	24	161	127	312	0	00.00%	133	133
331 BS 48	8	27	18	53	0	00.00%	20	20
331 BS 49	6	7	4	17	0	00.00%	9	9
331 BS 65	83	394	232	709	0	00.00%	181	181
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	10	10
399 BS 31	3	22	14	39	0	00.00%	12	12
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	6	6
455 BS 56	102	356	234	692	0	00.00%	494	494
471 BS 66	21	402	266	689	0	00.00%	514	514
482 BS 61	2	9	3	14	0	00.00%	13	13
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	598	598
490 BS 70	42	222	193	457	0	00.00%	364	364
226 BS 34	3	64	21	88	0	00.00%	78	78
Totals	5221	35771	23958	64950	0		44607	44607

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Family District Judge, 306th Judicial District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Anne B. Darring	Totals
103 BS 39	14	151	83	248	0	00.00%	184	184
103 BS 76	9	59	58	126	0	00.00%	93	93
104 BS 39	10	164	113	287	0	00.00%	217	217
105 BS 39	3	19	13	35	0	00.00%	30	30
105-1 BS 50	22	79	79	180	0	00.00%	110	110
142 BS 38	63	411	277	751	0	00.00%	456	456
144 BS 57	79	465	273	817	0	00.00%	596	596
146 BS 38	65	461	331	857	0	00.00%	580	580
148 BS 38	132	641	444	1217	0	00.00%	842	842
150 BS 38	50	419	267	736	0	00.00%	497	497
151 BS 38	54	542	413	1009	0	00.00%	785	785
152 BS 47	149	1196	665	2010	0	00.00%	1616	1616
159 BS 38	58	571	421	1050	0	00.00%	767	767
165 BS 41	43	420	384	847	0	00.00%	669	669
166 BS 47	2	2	1	5	0	00.00%	4	4
167 BS 47	170	953	514	1637	0	00.00%	1306	1306
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	876	876
172 BS 38	14	111	69	194	0	00.00%	138	138
192 BS 19	13	99	68	180	0	00.00%	127	127
193 BS 47	63	417	364	844	0	00.00%	658	658
197 BS 38	18	111	85	214	0	00.00%	164	164
218 BS 33	137	675	402	1214	0	00.00%	720	720
219 BS 42	6	115	91	212	0	00.00%	142	142
220 BS 34	9	83	46	138	0	00.00%	124	124
221 BS 33	87	368	318	773	0	00.00%	583	583
223 BS 33	98	460	357	915	0	00.00%	553	553
224 BS 33	119	564	415	1098	0	00.00%	645	645
225 BS 35	66	697	429	1192	0	00.00%	949	949
226 BS 35	58	348	281	687	0	00.00%	456	456
227 BS 34	82	608	329	1019	0	00.00%	790	790
228 BS 34	69	747	417	1233	0	00.00%	998	998
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	159	159
258 BS 34	43	410	304	757	0	00.00%	611	611
263 BS 58	93	1140	770	2003	0	00.00%	1613	1613
274 BS 33	22	106	198	326	0	00.00%	250	250
275 BS 33	27	61	55	143	0	00.00%	109	109
276 BS 33	70	381	313	764	0	00.00%	493	493
277 BS 34	44	533	262	839	0	00.00%	664	664

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Family District Judge, 306th Judicial District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Anne B. Darring	Totals
278 BS 34	64	549	329	942	0	00.00%	739	739
279 BS 34	21	201	148	370	0	00.00%	310	310
280 BS 35	0	32	16	48	0	00.00%	31	31
281 BS 35	2	48	34	84	0	00.00%	63	63
283 BS 34	10	75	32	117	0	00.00%	86	86
301 BS 50	9	163	125	297	0	00.00%	143	143
306 BS 50	130	724	519	1373	0	00.00%	678	678
309 BS 39	11	18	10	39	0	00.00%	25	25
311 BS 39	21	109	98	228	0	00.00%	46	46
314 BS 39	157	566	484	1207	0	00.00%	332	332
315 BS 50	139	547	425	1111	0	00.00%	438	438
316 BS 39	71	235	235	541	0	00.00%	207	207
330 BS 48	48	260	157	465	0	00.00%	175	175
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	61	61
334 BS 63	37	188	121	346	0	00.00%	66	66
336 BS 39	218	763	510	1491	0	00.00%	195	195
338 BS 50	102	562	368	1032	0	00.00%	461	461
340 BS 19	21	94	45	160	0	00.00%	18	18
341 BS 19	23	157	143	323	0	00.00%	192	192
343 BS 38	30	213	195	438	0	00.00%	205	205
345 BS 39	24	113	98	235	0	00.00%	37	37
347 BS 38	44	167	118	329	0	00.00%	105	105
389 BS 19	13	108	54	175	0	00.00%	64	64
391 BS 19	3	10	11	24	0	00.00%	15	15
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	65	65
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1038	1038
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	971	971
454 BS 66	109	835	498	1442	0	00.00%	1041	1041
455 BS 55	0	6	5	11	0	00.00%	7	7
456 BS 46	155	937	459	1551	0	00.00%	1303	1303
457 BS 46	159	1059	613	1831	0	00.00%	1567	1567
460 BS 46	143	1424	679	2246	0	00.00%	1890	1890
461 BS 46	60	840	539	1439	0	00.00%	1203	1203
462 BS 46	66	884	496	1446	0	00.00%	1233	1233
464 BS 55	125	654	388	1167	0	00.00%	941	941

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Family District Judge, 306th Judicial District

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Anne B. Darring	Totals
471 BS 46	3	49	14	66	0	00.00%	47	47
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1326	1326
488 BS 55	38	314	244	596	0	00.00%	486	486
490 BS 69	68	504	389	961	0	00.00%	762	762
166 BS 57	83	527	423	1033	0	00.00%	773	773
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	224	224
219 BS 43	10	51	57	118	0	00.00%	36	36
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	64	64
220 BS 35	12	124	95	231	0	00.00%	168	168
220 BS 53	43	435	402	880	0	00.00%	623	623
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	110	110
232 BS 67	7	22	11	40	0	00.00%	20	20
232 BS 68	38	240	143	421	0	00.00%	221	221
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	240	240
283 BS 53	20	297	315	632	0	00.00%	448	448
330 BS 49	24	161	127	312	0	00.00%	137	137
331 BS 48	8	27	18	53	0	00.00%	21	21
331 BS 49	6	7	4	17	0	00.00%	9	9
331 BS 65	83	394	232	709	0	00.00%	186	186
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	11	11
399 BS 31	3	22	14	39	0	00.00%	12	12
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	6	6
455 BS 56	102	356	234	692	0	00.00%	493	493
471 BS 66	21	402	266	689	0	00.00%	518	518
482 BS 61	2	9	3	14	0	00.00%	13	13
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	596	596
490 BS 70	42	222	193	457	0	00.00%	362	362
226 BS 34	3	64	21	88	0	00.00%	78	78
Totals	5221	35771	23958	64950	0		44623	44623

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Attorney

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jack Roady	Totals
103 BS 39	14	151	83	248	0	00.00%	177	177
103 BS 76	9	59	58	126	0	00.00%	94	94
104 BS 39	10	164	113	287	0	00.00%	209	209
105 BS 39	3	19	13	35	0	00.00%	28	28
105-1 BS 50	22	79	79	180	0	00.00%	106	106
142 BS 38	63	411	277	751	0	00.00%	456	456
144 BS 57	79	465	273	817	0	00.00%	597	597
146 BS 38	65	461	331	857	0	00.00%	571	571
148 BS 38	132	641	444	1217	0	00.00%	825	825
150 BS 38	50	419	267	736	0	00.00%	476	476
151 BS 38	54	542	413	1009	0	00.00%	785	785
152 BS 47	149	1196	665	2010	0	00.00%	1613	1613
159 BS 38	58	571	421	1050	0	00.00%	766	766
165 BS 41	43	420	384	847	0	00.00%	659	659
166 BS 47	2	2	1	5	0	00.00%	4	4
167 BS 47	170	953	514	1637	0	00.00%	1312	1312
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	874	874
172 BS 38	14	111	69	194	0	00.00%	140	140
192 BS 19	13	99	68	180	0	00.00%	127	127
193 BS 47	63	417	364	844	0	00.00%	658	658
197 BS 38	18	111	85	214	0	00.00%	164	164
218 BS 33	137	675	402	1214	0	00.00%	707	707
219 BS 42	6	115	91	212	0	00.00%	141	141
220 BS 34	9	83	46	138	0	00.00%	126	126
221 BS 33	87	368	318	773	0	00.00%	581	581
223 BS 33	98	460	357	915	0	00.00%	547	547
224 BS 33	119	564	415	1098	0	00.00%	637	637
225 BS 35	66	697	429	1192	0	00.00%	950	950
226 BS 35	58	348	281	687	0	00.00%	470	470
227 BS 34	82	608	329	1019	0	00.00%	797	797
228 BS 34	69	747	417	1233	0	00.00%	1003	1003
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	160	160
258 BS 34	43	410	304	757	0	00.00%	610	610
263 BS 58	93	1140	770	2003	0	00.00%	1613	1613
274 BS 33	22	106	198	326	0	00.00%	249	249
275 BS 33	27	61	55	143	0	00.00%	109	109
276 BS 33	70	381	313	764	0	00.00%	487	487
277 BS 34	44	533	262	839	0	00.00%	676	676

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Attorney

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jack Roady	Totals
278 BS 34	64	549	329	942	0	00.00%	754	754
279 BS 34	21	201	148	370	0	00.00%	317	317
280 BS 35	0	32	16	48	0	00.00%	30	30
281 BS 35	2	48	34	84	0	00.00%	64	64
283 BS 34	10	75	32	117	0	00.00%	84	84
301 BS 50	9	163	125	297	0	00.00%	138	138
306 BS 50	130	724	519	1373	0	00.00%	665	665
309 BS 39	11	18	10	39	0	00.00%	27	27
311 BS 39	21	109	98	228	0	00.00%	43	43
314 BS 39	157	566	484	1207	0	00.00%	336	336
315 BS 50	139	547	425	1111	0	00.00%	437	437
316 BS 39	71	235	235	541	0	00.00%	194	194
330 BS 48	48	260	157	465	0	00.00%	174	174
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	58	58
334 BS 63	37	188	121	346	0	00.00%	66	66
336 BS 39	218	763	510	1491	0	00.00%	190	190
338 BS 50	102	562	368	1032	0	00.00%	446	446
340 BS 19	21	94	45	160	0	00.00%	19	19
341 BS 19	23	157	143	323	0	00.00%	189	189
343 BS 38	30	213	195	438	0	00.00%	201	201
345 BS 39	24	113	98	235	0	00.00%	34	34
347 BS 38	44	167	118	329	0	00.00%	102	102
389 BS 19	13	108	54	175	0	00.00%	64	64
391 BS 19	3	10	11	24	0	00.00%	15	15
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	66	66
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1043	1043
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	973	973
454 BS 66	109	835	498	1442	0	00.00%	1048	1048
455 BS 55	0	6	5	11	0	00.00%	8	8
456 BS 46	155	937	459	1551	0	00.00%	1302	1302
457 BS 46	159	1059	613	1831	0	00.00%	1563	1563
460 BS 46	143	1424	679	2246	0	00.00%	1895	1895
461 BS 46	60	840	539	1439	0	00.00%	1205	1205
462 BS 46	66	884	496	1446	0	00.00%	1227	1227
464 BS 55	125	654	388	1167	0	00.00%	938	938

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Attorney

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jack Roady	Totals
471 BS 46	3	49	14	66	0	00.00%	48	48
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1325	1325
488 BS 55	38	314	244	596	0	00.00%	489	489
490 BS 69	68	504	389	961	0	00.00%	758	758
166 BS 57	83	527	423	1033	0	00.00%	765	765
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	229	229
219 BS 43	10	51	57	118	0	00.00%	38	38
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	64	64
220 BS 35	12	124	95	231	0	00.00%	172	172
220 BS 53	43	435	402	880	0	00.00%	628	628
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	107	107
232 BS 67	7	22	11	40	0	00.00%	20	20
232 BS 68	38	240	143	421	0	00.00%	212	212
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	238	238
283 BS 53	20	297	315	632	0	00.00%	454	454
330 BS 49	24	161	127	312	0	00.00%	130	130
331 BS 48	8	27	18	53	0	00.00%	23	23
331 BS 49	6	7	4	17	0	00.00%	11	11
331 BS 65	83	394	232	709	0	00.00%	170	170
331 BS 64	0	13	7	20	0	00.00%	10	10
399 BS 28	2	10	6	18	0	00.00%	10	10
399 BS 31	3	22	14	39	0	00.00%	14	14
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	6	6
455 BS 56	102	356	234	692	0	00.00%	501	501
471 BS 66	21	402	266	689	0	00.00%	509	509
482 BS 61	2	9	3	14	0	00.00%	12	12
482 BS 62	6	16	6	28	0	00.00%	22	22
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	601	601
490 BS 70	42	222	193	457	0	00.00%	364	364
226 BS 34	3	64	21	88	0	00.00%	77	77
Totals	5221	35771	23958	64950	0		44500	44500

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Judge

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Mark Henry	IND William F. (Bill) Young	Totals
103 BS 39	14	151	83	248	0	00.00%	130	82	212
103 BS 76	9	59	58	126	0	00.00%	65	38	103
104 BS 39	10	164	113	287	0	00.00%	164	97	261
105 BS 39	3	19	13	35	0	00.00%	23	8	31
105-1 BS 50	22	79	79	180	0	00.00%	87	64	151
142 BS 38	63	411	277	751	0	00.00%	377	170	547
144 BS 57	79	465	273	817	0	00.00%	518	165	683
146 BS 38	65	461	331	857	0	00.00%	475	218	693
148 BS 38	132	641	444	1217	0	00.00%	678	332	1010
150 BS 38	50	419	267	736	0	00.00%	397	192	589
151 BS 38	54	542	413	1009	0	00.00%	684	209	893
152 BS 47	149	1196	665	2010	0	00.00%	1408	403	1811
159 BS 38	58	571	421	1050	0	00.00%	654	242	896
165 BS 41	43	420	384	847	0	00.00%	579	177	756
166 BS 47	2	2	1	5	0	00.00%	3	1	4
167 BS 47	170	953	514	1637	0	00.00%	1193	291	1484
168 BS 39	0	0	0	0	0	00.00%	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	741	240	981
172 BS 38	14	111	69	194	0	00.00%	131	30	161
192 BS 19	13	99	68	180	0	00.00%	118	34	152
193 BS 47	63	417	364	844	0	00.00%	576	183	759
197 BS 38	18	111	85	214	0	00.00%	142	42	184
218 BS 33	137	675	402	1214	0	00.00%	530	423	953
219 BS 42	6	115	91	212	0	00.00%	123	47	170
220 BS 34	9	83	46	138	0	00.00%	112	20	132
221 BS 33	87	368	318	773	0	00.00%	506	198	704
223 BS 33	98	460	357	915	0	00.00%	433	305	738
224 BS 33	119	564	415	1098	0	00.00%	461	379	840
225 BS 35	66	697	429	1192	0	00.00%	859	215	1074
226 BS 35	58	348	281	687	0	00.00%	375	165	540
227 BS 34	82	608	329	1019	0	00.00%	655	256	911
228 BS 34	69	747	417	1233	0	00.00%	857	259	1116
232 BS 33	1	0	0	1	0	00.00%	0	0	0
232-3 BS 37	10	122	53	185	0	00.00%	137	36	173
258 BS 34	43	410	304	757	0	00.00%	520	159	679
263 BS 58	93	1140	770	2003	0	00.00%	1422	425	1847
274 BS 33	22	106	198	326	0	00.00%	220	69	289
275 BS 33	27	61	55	143	0	00.00%	104	20	124
276 BS 33	70	381	313	764	0	00.00%	400	246	646
277 BS 34	44	533	262	839	0	00.00%	553	202	755

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Judge

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Mark Henry	IND William F. (Bill) Young	Totals
278 BS 34	64	549	329	942	0	00.00%	602	240	842
279 BS 34	21	201	148	370	0	00.00%	269	66	335
280 BS 35	0	32	16	48	0	00.00%	26	15	41
281 BS 35	2	48	34	84	0	00.00%	58	17	75
283 BS 34	10	75	32	117	0	00.00%	75	33	108
301 BS 50	9	163	125	297	0	00.00%	110	83	193
306 BS 50	130	724	519	1373	0	00.00%	505	508	1013
309 BS 39	11	18	10	39	0	00.00%	18	14	32
311 BS 39	21	109	98	228	0	00.00%	29	54	83
314 BS 39	157	566	484	1207	0	00.00%	241	363	604
315 BS 50	139	547	425	1111	0	00.00%	326	383	709
316 BS 39	71	235	235	541	0	00.00%	138	162	300
330 BS 48	48	260	157	465	0	00.00%	135	121	256
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	46	26	72
334 BS 63	37	188	121	346	0	00.00%	44	64	108
336 BS 39	218	763	510	1491	0	00.00%	126	491	617
338 BS 50	102	562	368	1032	0	00.00%	364	293	657
340 BS 19	21	94	45	160	0	00.00%	13	56	69
341 BS 19	23	157	143	323	0	00.00%	156	94	250
343 BS 38	30	213	195	438	0	00.00%	164	123	287
345 BS 39	24	113	98	235	0	00.00%	26	50	76
347 BS 38	44	167	118	329	0	00.00%	81	85	166
389 BS 19	13	108	54	175	0	00.00%	57	40	97
391 BS 19	3	10	11	24	0	00.00%	12	4	16
394 BS 38	0	6	8	14	0	00.00%	7	4	11
398 BS 19	3	67	40	110	0	00.00%	46	36	82
399 BS 19	0	0	1	1	0	00.00%	1	0	1
439 BS 46	137	862	427	1426	0	00.00%	927	314	1241
439-1 BS 52	0	14	1	15	0	00.00%	11	4	15
453 BS 72	140	643	483	1266	0	00.00%	800	316	1116
454 BS 66	109	835	498	1442	0	00.00%	857	404	1261
455 BS 55	0	6	5	11	0	00.00%	7	3	10
456 BS 46	155	937	459	1551	0	00.00%	1202	232	1434
457 BS 46	159	1059	613	1831	0	00.00%	1442	254	1696
460 BS 46	143	1424	679	2246	0	00.00%	1754	300	2054
461 BS 46	60	840	539	1439	0	00.00%	1096	219	1315
462 BS 46	66	884	496	1446	0	00.00%	1126	211	1337
464 BS 55	125	654	388	1167	0	00.00%	810	259	1069

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Judge

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Mark Henry	IND William F. (Bill) Young	Totals
471 BS 46	3	49	14	66	0	00.00%	41	12	53
482 BS 60	0	0	0	0	0	00.00%	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1114	449	1563
488 BS 55	38	314	244	596	0	00.00%	426	110	536
490 BS 69	68	504	389	961	0	00.00%	652	218	870
166 BS 57	83	527	423	1033	0	00.00%	713	213	926
167 BS 57	0	3	0	3	0	00.00%	2	1	3
167 BS 77	28	185	90	303	0	00.00%	191	78	269
219 BS 43	10	51	57	118	0	00.00%	32	28	60
219 BS 44	1	8	8	17	0	00.00%	8	6	14
219 BS 45	10	58	48	116	0	00.00%	51	40	91
220 BS 35	12	124	95	231	0	00.00%	136	58	194
220 BS 53	43	435	402	880	0	00.00%	525	210	735
220 BS 54	0	0	2	2	0	00.00%	0	1	1
228 BS 35	0	2	0	2	0	00.00%	2	0	2
232 BS 37	17	94	86	197	0	00.00%	88	50	138
232 BS 67	7	22	11	40	0	00.00%	17	13	30
232 BS 68	38	240	143	421	0	00.00%	174	122	296
277 BS 35	0	0	0	0	0	00.00%	0	0	0
283 BS 35	26	203	104	333	0	00.00%	204	73	277
283 BS 53	20	297	315	632	0	00.00%	364	176	540
330 BS 49	24	161	127	312	0	00.00%	111	76	187
331 BS 48	8	27	18	53	0	00.00%	18	18	36
331 BS 49	6	7	4	17	0	00.00%	7	5	12
331 BS 65	83	394	232	709	0	00.00%	121	197	318
331 BS 64	0	13	7	20	0	00.00%	9	3	12
399 BS 28	2	10	6	18	0	00.00%	8	4	12
399 BS 31	3	22	14	39	0	00.00%	10	7	17
453 BS 73	1	19	7	27	0	00.00%	19	4	23
454 BS 72	1	4	4	9	0	00.00%	4	4	8
455 BS 56	102	356	234	692	0	00.00%	421	173	594
471 BS 66	21	402	266	689	0	00.00%	427	181	608
482 BS 61	2	9	3	14	0	00.00%	11	2	13
482 BS 62	6	16	6	28	0	00.00%	22	3	25
487 BS 66	1	12	7	20	0	00.00%	14	4	18
488 BS 56	43	439	298	780	0	00.00%	510	176	686
490 BS 70	42	222	193	457	0	00.00%	313	99	412
226 BS 34	3	64	21	88	0	00.00%	67	14	81
Totals	5221	35771	23958	64950	0		37949	15411	53360

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Court At Law No. 1

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John Grady	Totals
103 BS 39	14	151	83	248	0	00.00%	177	177
103 BS 76	9	59	58	126	0	00.00%	93	93
104 BS 39	10	164	113	287	0	00.00%	207	207
105 BS 39	3	19	13	35	0	00.00%	28	28
105-1 BS 50	22	79	79	180	0	00.00%	108	108
142 BS 38	63	411	277	751	0	00.00%	451	451
144 BS 57	79	465	273	817	0	00.00%	588	588
146 BS 38	65	461	331	857	0	00.00%	571	571
148 BS 38	132	641	444	1217	0	00.00%	814	814
150 BS 38	50	419	267	736	0	00.00%	485	485
151 BS 38	54	542	413	1009	0	00.00%	781	781
152 BS 47	149	1196	665	2010	0	00.00%	1602	1602
159 BS 38	58	571	421	1050	0	00.00%	761	761
165 BS 41	43	420	384	847	0	00.00%	659	659
166 BS 47	2	2	1	5	0	00.00%	4	4
167 BS 47	170	953	514	1637	0	00.00%	1307	1307
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	862	862
172 BS 38	14	111	69	194	0	00.00%	138	138
192 BS 19	13	99	68	180	0	00.00%	129	129
193 BS 47	63	417	364	844	0	00.00%	655	655
197 BS 38	18	111	85	214	0	00.00%	162	162
218 BS 33	137	675	402	1214	0	00.00%	698	698
219 BS 42	6	115	91	212	0	00.00%	141	141
220 BS 34	9	83	46	138	0	00.00%	124	124
221 BS 33	87	368	318	773	0	00.00%	580	580
223 BS 33	98	460	357	915	0	00.00%	546	546
224 BS 33	119	564	415	1098	0	00.00%	632	632
225 BS 35	66	697	429	1192	0	00.00%	941	941
226 BS 35	58	348	281	687	0	00.00%	451	451
227 BS 34	82	608	329	1019	0	00.00%	785	785
228 BS 34	69	747	417	1233	0	00.00%	990	990
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	161	161
258 BS 34	43	410	304	757	0	00.00%	600	600
263 BS 58	93	1140	770	2003	0	00.00%	1601	1601
274 BS 33	22	106	198	326	0	00.00%	252	252
275 BS 33	27	61	55	143	0	00.00%	109	109
276 BS 33	70	381	313	764	0	00.00%	491	491
277 BS 34	44	533	262	839	0	00.00%	658	658

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Court At Law No. 1

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John Grady	Totals
278 BS 34	64	549	329	942	0	00.00%	738	738
279 BS 34	21	201	148	370	0	00.00%	308	308
280 BS 35	0	32	16	48	0	00.00%	30	30
281 BS 35	2	48	34	84	0	00.00%	62	62
283 BS 34	10	75	32	117	0	00.00%	84	84
301 BS 50	9	163	125	297	0	00.00%	139	139
306 BS 50	130	724	519	1373	0	00.00%	664	664
309 BS 39	11	18	10	39	0	00.00%	25	25
311 BS 39	21	109	98	228	0	00.00%	44	44
314 BS 39	157	566	484	1207	0	00.00%	323	323
315 BS 50	139	547	425	1111	0	00.00%	424	424
316 BS 39	71	235	235	541	0	00.00%	204	204
330 BS 48	48	260	157	465	0	00.00%	177	177
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	60	60
334 BS 63	37	188	121	346	0	00.00%	64	64
336 BS 39	218	763	510	1491	0	00.00%	178	178
338 BS 50	102	562	368	1032	0	00.00%	448	448
340 BS 19	21	94	45	160	0	00.00%	18	18
341 BS 19	23	157	143	323	0	00.00%	192	192
343 BS 38	30	213	195	438	0	00.00%	205	205
345 BS 39	24	113	98	235	0	00.00%	35	35
347 BS 38	44	167	118	329	0	00.00%	99	99
389 BS 19	13	108	54	175	0	00.00%	65	65
391 BS 19	3	10	11	24	0	00.00%	15	15
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	64	64
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1037	1037
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	956	956
454 BS 66	109	835	498	1442	0	00.00%	1040	1040
455 BS 55	0	6	5	11	0	00.00%	8	8
456 BS 46	155	937	459	1551	0	00.00%	1294	1294
457 BS 46	159	1059	613	1831	0	00.00%	1551	1551
460 BS 46	143	1424	679	2246	0	00.00%	1878	1878
461 BS 46	60	840	539	1439	0	00.00%	1198	1198
462 BS 46	66	884	496	1446	0	00.00%	1224	1224
464 BS 55	125	654	388	1167	0	00.00%	927	927

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Court At Law No. 1

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John Grady	Totals
471 BS 46	3	49	14	66	0	00.00%	45	45
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1315	1315
488 BS 55	38	314	244	596	0	00.00%	489	489
490 BS 69	68	504	389	961	0	00.00%	755	755
166 BS 57	83	527	423	1033	0	00.00%	767	767
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	224	224
219 BS 43	10	51	57	118	0	00.00%	35	35
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	64	64
220 BS 35	12	124	95	231	0	00.00%	168	168
220 BS 53	43	435	402	880	0	00.00%	613	613
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	106	106
232 BS 67	7	22	11	40	0	00.00%	21	21
232 BS 68	38	240	143	421	0	00.00%	212	212
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	236	236
283 BS 53	20	297	315	632	0	00.00%	445	445
330 BS 49	24	161	127	312	0	00.00%	131	131
331 BS 48	8	27	18	53	0	00.00%	23	23
331 BS 49	6	7	4	17	0	00.00%	10	10
331 BS 65	83	394	232	709	0	00.00%	167	167
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	10	10
399 BS 31	3	22	14	39	0	00.00%	13	13
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	6	6
455 BS 56	102	356	234	692	0	00.00%	491	491
471 BS 66	21	402	266	689	0	00.00%	505	505
482 BS 61	2	9	3	14	0	00.00%	12	12
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	595	595
490 BS 70	42	222	193	457	0	00.00%	366	366
226 BS 34	3	64	21	88	0	00.00%	78	78
Totals	5221	35771	23958	64950	0		44130	44130

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Court At Law No. 2

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Barbara E. Roberts	Totals
103 BS 39	14	151	83	248	0	00.00%	175	175
103 BS 76	9	59	58	126	0	00.00%	94	94
104 BS 39	10	164	113	287	0	00.00%	210	210
105 BS 39	3	19	13	35	0	00.00%	28	28
105-1 BS 50	22	79	79	180	0	00.00%	107	107
142 BS 38	63	411	277	751	0	00.00%	456	456
144 BS 57	79	465	273	817	0	00.00%	595	595
146 BS 38	65	461	331	857	0	00.00%	574	574
148 BS 38	132	641	444	1217	0	00.00%	821	821
150 BS 38	50	419	267	736	0	00.00%	482	482
151 BS 38	54	542	413	1009	0	00.00%	779	779
152 BS 47	149	1196	665	2010	0	00.00%	1611	1611
159 BS 38	58	571	421	1050	0	00.00%	756	756
165 BS 41	43	420	384	847	0	00.00%	657	657
166 BS 47	2	2	1	5	0	00.00%	4	4
167 BS 47	170	953	514	1637	0	00.00%	1303	1303
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	865	865
172 BS 38	14	111	69	194	0	00.00%	138	138
192 BS 19	13	99	68	180	0	00.00%	130	130
193 BS 47	63	417	364	844	0	00.00%	663	663
197 BS 38	18	111	85	214	0	00.00%	161	161
218 BS 33	137	675	402	1214	0	00.00%	730	730
219 BS 42	6	115	91	212	0	00.00%	141	141
220 BS 34	9	83	46	138	0	00.00%	124	124
221 BS 33	87	368	318	773	0	00.00%	582	582
223 BS 33	98	460	357	915	0	00.00%	567	567
224 BS 33	119	564	415	1098	0	00.00%	655	655
225 BS 35	66	697	429	1192	0	00.00%	939	939
226 BS 35	58	348	281	687	0	00.00%	449	449
227 BS 34	82	608	329	1019	0	00.00%	790	790
228 BS 34	69	747	417	1233	0	00.00%	984	984
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	160	160
258 BS 34	43	410	304	757	0	00.00%	600	600
263 BS 58	93	1140	770	2003	0	00.00%	1606	1606
274 BS 33	22	106	198	326	0	00.00%	251	251
275 BS 33	27	61	55	143	0	00.00%	108	108
276 BS 33	70	381	313	764	0	00.00%	495	495
277 BS 34	44	533	262	839	0	00.00%	652	652

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Court At Law No. 2

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Barbara E. Roberts	Totals
278 BS 34	64	549	329	942	0	00.00%	731	731
279 BS 34	21	201	148	370	0	00.00%	306	306
280 BS 35	0	32	16	48	0	00.00%	30	30
281 BS 35	2	48	34	84	0	00.00%	64	64
283 BS 34	10	75	32	117	0	00.00%	86	86
301 BS 50	9	163	125	297	0	00.00%	140	140
306 BS 50	130	724	519	1373	0	00.00%	683	683
309 BS 39	11	18	10	39	0	00.00%	23	23
311 BS 39	21	109	98	228	0	00.00%	46	46
314 BS 39	157	566	484	1207	0	00.00%	339	339
315 BS 50	139	547	425	1111	0	00.00%	445	445
316 BS 39	71	235	235	541	0	00.00%	210	210
330 BS 48	48	260	157	465	0	00.00%	173	173
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	60	60
334 BS 63	37	188	121	346	0	00.00%	64	64
336 BS 39	218	763	510	1491	0	00.00%	185	185
338 BS 50	102	562	368	1032	0	00.00%	448	448
340 BS 19	21	94	45	160	0	00.00%	18	18
341 BS 19	23	157	143	323	0	00.00%	193	193
343 BS 38	30	213	195	438	0	00.00%	206	206
345 BS 39	24	113	98	235	0	00.00%	35	35
347 BS 38	44	167	118	329	0	00.00%	99	99
389 BS 19	13	108	54	175	0	00.00%	65	65
391 BS 19	3	10	11	24	0	00.00%	15	15
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	62	62
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1030	1030
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	962	962
454 BS 66	109	835	498	1442	0	00.00%	1051	1051
455 BS 55	0	6	5	11	0	00.00%	8	8
456 BS 46	155	937	459	1551	0	00.00%	1291	1291
457 BS 46	159	1059	613	1831	0	00.00%	1554	1554
460 BS 46	143	1424	679	2246	0	00.00%	1880	1880
461 BS 46	60	840	539	1439	0	00.00%	1195	1195
462 BS 46	66	884	496	1446	0	00.00%	1227	1227
464 BS 55	125	654	388	1167	0	00.00%	933	933

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Court At Law No. 2

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Barbara E. Roberts	Totals
471 BS 46	3	49	14	66	0	00.00%	46	46
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1316	1316
488 BS 55	38	314	244	596	0	00.00%	488	488
490 BS 69	68	504	389	961	0	00.00%	757	757
166 BS 57	83	527	423	1033	0	00.00%	763	763
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	225	225
219 BS 43	10	51	57	118	0	00.00%	36	36
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	64	64
220 BS 35	12	124	95	231	0	00.00%	171	171
220 BS 53	43	435	402	880	0	00.00%	618	618
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	104	104
232 BS 67	7	22	11	40	0	00.00%	21	21
232 BS 68	38	240	143	421	0	00.00%	215	215
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	237	237
283 BS 53	20	297	315	632	0	00.00%	447	447
330 BS 49	24	161	127	312	0	00.00%	131	131
331 BS 48	8	27	18	53	0	00.00%	22	22
331 BS 49	6	7	4	17	0	00.00%	9	9
331 BS 65	83	394	232	709	0	00.00%	171	171
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	10	10
399 BS 31	3	22	14	39	0	00.00%	12	12
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	7	7
455 BS 56	102	356	234	692	0	00.00%	495	495
471 BS 66	21	402	266	689	0	00.00%	508	508
482 BS 61	2	9	3	14	0	00.00%	12	12
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	595	595
490 BS 70	42	222	193	457	0	00.00%	364	364
226 BS 34	3	64	21	88	0	00.00%	77	77
Totals	5221	35771	23958	64950	0		44328	44328

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Court At Law No. 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jack Ewing	Totals
103 BS 39	14	151	83	248	0	00.00%	176	176
103 BS 76	9	59	58	126	0	00.00%	94	94
104 BS 39	10	164	113	287	0	00.00%	212	212
105 BS 39	3	19	13	35	0	00.00%	28	28
105-1 BS 50	22	79	79	180	0	00.00%	105	105
142 BS 38	63	411	277	751	0	00.00%	458	458
144 BS 57	79	465	273	817	0	00.00%	588	588
146 BS 38	65	461	331	857	0	00.00%	574	574
148 BS 38	132	641	444	1217	0	00.00%	824	824
150 BS 38	50	419	267	736	0	00.00%	486	486
151 BS 38	54	542	413	1009	0	00.00%	777	777
152 BS 47	149	1196	665	2010	0	00.00%	1605	1605
159 BS 38	58	571	421	1050	0	00.00%	759	759
165 BS 41	43	420	384	847	0	00.00%	656	656
166 BS 47	2	2	1	5	0	00.00%	4	4
167 BS 47	170	953	514	1637	0	00.00%	1313	1313
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	864	864
172 BS 38	14	111	69	194	0	00.00%	142	142
192 BS 19	13	99	68	180	0	00.00%	130	130
193 BS 47	63	417	364	844	0	00.00%	651	651
197 BS 38	18	111	85	214	0	00.00%	161	161
218 BS 33	137	675	402	1214	0	00.00%	698	698
219 BS 42	6	115	91	212	0	00.00%	142	142
220 BS 34	9	83	46	138	0	00.00%	124	124
221 BS 33	87	368	318	773	0	00.00%	576	576
223 BS 33	98	460	357	915	0	00.00%	547	547
224 BS 33	119	564	415	1098	0	00.00%	629	629
225 BS 35	66	697	429	1192	0	00.00%	948	948
226 BS 35	58	348	281	687	0	00.00%	452	452
227 BS 34	82	608	329	1019	0	00.00%	792	792
228 BS 34	69	747	417	1233	0	00.00%	992	992
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	161	161
258 BS 34	43	410	304	757	0	00.00%	607	607
263 BS 58	93	1140	770	2003	0	00.00%	1599	1599
274 BS 33	22	106	198	326	0	00.00%	248	248
275 BS 33	27	61	55	143	0	00.00%	108	108
276 BS 33	70	381	313	764	0	00.00%	492	492
277 BS 34	44	533	262	839	0	00.00%	665	665

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Court At Law No. 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jack Ewing	Totals
278 BS 34	64	549	329	942	0	00.00%	736	736
279 BS 34	21	201	148	370	0	00.00%	309	309
280 BS 35	0	32	16	48	0	00.00%	31	31
281 BS 35	2	48	34	84	0	00.00%	64	64
283 BS 34	10	75	32	117	0	00.00%	84	84
301 BS 50	9	163	125	297	0	00.00%	140	140
306 BS 50	130	724	519	1373	0	00.00%	653	653
309 BS 39	11	18	10	39	0	00.00%	25	25
311 BS 39	21	109	98	228	0	00.00%	45	45
314 BS 39	157	566	484	1207	0	00.00%	323	323
315 BS 50	139	547	425	1111	0	00.00%	421	421
316 BS 39	71	235	235	541	0	00.00%	202	202
330 BS 48	48	260	157	465	0	00.00%	178	178
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	62	62
334 BS 63	37	188	121	346	0	00.00%	67	67
336 BS 39	218	763	510	1491	0	00.00%	193	193
338 BS 50	102	562	368	1032	0	00.00%	454	454
340 BS 19	21	94	45	160	0	00.00%	17	17
341 BS 19	23	157	143	323	0	00.00%	194	194
343 BS 38	30	213	195	438	0	00.00%	207	207
345 BS 39	24	113	98	235	0	00.00%	36	36
347 BS 38	44	167	118	329	0	00.00%	99	99
389 BS 19	13	108	54	175	0	00.00%	66	66
391 BS 19	3	10	11	24	0	00.00%	15	15
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	62	62
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1033	1033
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	956	956
454 BS 66	109	835	498	1442	0	00.00%	1044	1044
455 BS 55	0	6	5	11	0	00.00%	8	8
456 BS 46	155	937	459	1551	0	00.00%	1294	1294
457 BS 46	159	1059	613	1831	0	00.00%	1552	1552
460 BS 46	143	1424	679	2246	0	00.00%	1878	1878
461 BS 46	60	840	539	1439	0	00.00%	1196	1196
462 BS 46	66	884	496	1446	0	00.00%	1215	1215
464 BS 55	125	654	388	1167	0	00.00%	927	927

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Court At Law No. 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jack Ewing	Totals
471 BS 46	3	49	14	66	0	00.00%	45	45
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1311	1311
488 BS 55	38	314	244	596	0	00.00%	486	486
490 BS 69	68	504	389	961	0	00.00%	753	753
166 BS 57	83	527	423	1033	0	00.00%	769	769
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	224	224
219 BS 43	10	51	57	118	0	00.00%	37	37
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	65	65
220 BS 35	12	124	95	231	0	00.00%	172	172
220 BS 53	43	435	402	880	0	00.00%	613	613
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	107	107
232 BS 67	7	22	11	40	0	00.00%	21	21
232 BS 68	38	240	143	421	0	00.00%	218	218
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	237	237
283 BS 53	20	297	315	632	0	00.00%	443	443
330 BS 49	24	161	127	312	0	00.00%	138	138
331 BS 48	8	27	18	53	0	00.00%	20	20
331 BS 49	6	7	4	17	0	00.00%	9	9
331 BS 65	83	394	232	709	0	00.00%	179	179
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	10	10
399 BS 31	3	22	14	39	0	00.00%	13	13
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	6	6
455 BS 56	102	356	234	692	0	00.00%	496	496
471 BS 66	21	402	266	689	0	00.00%	501	501
482 BS 61	2	9	3	14	0	00.00%	12	12
482 BS 62	6	16	6	28	0	00.00%	22	22
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	593	593
490 BS 70	42	222	193	457	0	00.00%	363	363
226 BS 34	3	64	21	88	0	00.00%	77	77
Totals	5221	35771	23958	64950	0		44198	44198

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Probate Court

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kim Sullivan	Totals
103 BS 39	14	151	83	248	0	00.00%	177	177
103 BS 76	9	59	58	126	0	00.00%	94	94
104 BS 39	10	164	113	287	0	00.00%	214	214
105 BS 39	3	19	13	35	0	00.00%	28	28
105-1 BS 50	22	79	79	180	0	00.00%	106	106
142 BS 38	63	411	277	751	0	00.00%	454	454
144 BS 57	79	465	273	817	0	00.00%	586	586
146 BS 38	65	461	331	857	0	00.00%	573	573
148 BS 38	132	641	444	1217	0	00.00%	827	827
150 BS 38	50	419	267	736	0	00.00%	489	489
151 BS 38	54	542	413	1009	0	00.00%	787	787
152 BS 47	149	1196	665	2010	0	00.00%	1608	1608
159 BS 38	58	571	421	1050	0	00.00%	757	757
165 BS 41	43	420	384	847	0	00.00%	661	661
166 BS 47	2	2	1	5	0	00.00%	4	4
167 BS 47	170	953	514	1637	0	00.00%	1305	1305
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	867	867
172 BS 38	14	111	69	194	0	00.00%	138	138
192 BS 19	13	99	68	180	0	00.00%	132	132
193 BS 47	63	417	364	844	0	00.00%	657	657
197 BS 38	18	111	85	214	0	00.00%	163	163
218 BS 33	137	675	402	1214	0	00.00%	709	709
219 BS 42	6	115	91	212	0	00.00%	140	140
220 BS 34	9	83	46	138	0	00.00%	125	125
221 BS 33	87	368	318	773	0	00.00%	580	580
223 BS 33	98	460	357	915	0	00.00%	560	560
224 BS 33	119	564	415	1098	0	00.00%	639	639
225 BS 35	66	697	429	1192	0	00.00%	947	947
226 BS 35	58	348	281	687	0	00.00%	456	456
227 BS 34	82	608	329	1019	0	00.00%	789	789
228 BS 34	69	747	417	1233	0	00.00%	990	990
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	160	160
258 BS 34	43	410	304	757	0	00.00%	602	602
263 BS 58	93	1140	770	2003	0	00.00%	1607	1607
274 BS 33	22	106	198	326	0	00.00%	247	247
275 BS 33	27	61	55	143	0	00.00%	108	108
276 BS 33	70	381	313	764	0	00.00%	498	498
277 BS 34	44	533	262	839	0	00.00%	657	657

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Probate Court

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kim Sullivan	Totals
278 BS 34	64	549	329	942	0	00.00%	741	741
279 BS 34	21	201	148	370	0	00.00%	307	307
280 BS 35	0	32	16	48	0	00.00%	30	30
281 BS 35	2	48	34	84	0	00.00%	63	63
283 BS 34	10	75	32	117	0	00.00%	85	85
301 BS 50	9	163	125	297	0	00.00%	140	140
306 BS 50	130	724	519	1373	0	00.00%	667	667
309 BS 39	11	18	10	39	0	00.00%	25	25
311 BS 39	21	109	98	228	0	00.00%	47	47
314 BS 39	157	566	484	1207	0	00.00%	332	332
315 BS 50	139	547	425	1111	0	00.00%	426	426
316 BS 39	71	235	235	541	0	00.00%	207	207
330 BS 48	48	260	157	465	0	00.00%	175	175
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	60	60
334 BS 63	37	188	121	346	0	00.00%	66	66
336 BS 39	218	763	510	1491	0	00.00%	184	184
338 BS 50	102	562	368	1032	0	00.00%	455	455
340 BS 19	21	94	45	160	0	00.00%	18	18
341 BS 19	23	157	143	323	0	00.00%	196	196
343 BS 38	30	213	195	438	0	00.00%	206	206
345 BS 39	24	113	98	235	0	00.00%	35	35
347 BS 38	44	167	118	329	0	00.00%	95	95
389 BS 19	13	108	54	175	0	00.00%	64	64
391 BS 19	3	10	11	24	0	00.00%	15	15
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	65	65
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1036	1036
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	963	963
454 BS 66	109	835	498	1442	0	00.00%	1055	1055
455 BS 55	0	6	5	11	0	00.00%	8	8
456 BS 46	155	937	459	1551	0	00.00%	1293	1293
457 BS 46	159	1059	613	1831	0	00.00%	1555	1555
460 BS 46	143	1424	679	2246	0	00.00%	1881	1881
461 BS 46	60	840	539	1439	0	00.00%	1195	1195
462 BS 46	66	884	496	1446	0	00.00%	1227	1227
464 BS 55	125	654	388	1167	0	00.00%	931	931

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Judge, County Probate Court

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kim Sullivan	Totals
471 BS 46	3	49	14	66	0	00.00%	46	46
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1317	1317
488 BS 55	38	314	244	596	0	00.00%	488	488
490 BS 69	68	504	389	961	0	00.00%	755	755
166 BS 57	83	527	423	1033	0	00.00%	765	765
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	222	222
219 BS 43	10	51	57	118	0	00.00%	36	36
219 BS 44	1	8	8	17	0	00.00%	12	12
219 BS 45	10	58	48	116	0	00.00%	66	66
220 BS 35	12	124	95	231	0	00.00%	170	170
220 BS 53	43	435	402	880	0	00.00%	617	617
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	105	105
232 BS 67	7	22	11	40	0	00.00%	21	21
232 BS 68	38	240	143	421	0	00.00%	215	215
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	239	239
283 BS 53	20	297	315	632	0	00.00%	446	446
330 BS 49	24	161	127	312	0	00.00%	136	136
331 BS 48	8	27	18	53	0	00.00%	23	23
331 BS 49	6	7	4	17	0	00.00%	9	9
331 BS 65	83	394	232	709	0	00.00%	175	175
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	11	11
399 BS 31	3	22	14	39	0	00.00%	13	13
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	6	6
455 BS 56	102	356	234	692	0	00.00%	494	494
471 BS 66	21	402	266	689	0	00.00%	506	506
482 BS 61	2	9	3	14	0	00.00%	12	12
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	590	590
490 BS 70	42	222	193	457	0	00.00%	363	363
226 BS 34	3	64	21	88	0	00.00%	78	78
Totals	5221	35771	23958	64950	0		44322	44322

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Clerk

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John D. Kinard	Totals
103 BS 39	14	151	83	248	0	00.00%	180	180
103 BS 76	9	59	58	126	0	00.00%	94	94
104 BS 39	10	164	113	287	0	00.00%	212	212
105 BS 39	3	19	13	35	0	00.00%	28	28
105-1 BS 50	22	79	79	180	0	00.00%	103	103
142 BS 38	63	411	277	751	0	00.00%	451	451
144 BS 57	79	465	273	817	0	00.00%	591	591
146 BS 38	65	461	331	857	0	00.00%	570	570
148 BS 38	132	641	444	1217	0	00.00%	822	822
150 BS 38	50	419	267	736	0	00.00%	482	482
151 BS 38	54	542	413	1009	0	00.00%	782	782
152 BS 47	149	1196	665	2010	0	00.00%	1605	1605
159 BS 38	58	571	421	1050	0	00.00%	764	764
165 BS 41	43	420	384	847	0	00.00%	654	654
166 BS 47	2	2	1	5	0	00.00%	5	5
167 BS 47	170	953	514	1637	0	00.00%	1312	1312
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	860	860
172 BS 38	14	111	69	194	0	00.00%	139	139
192 BS 19	13	99	68	180	0	00.00%	130	130
193 BS 47	63	417	364	844	0	00.00%	655	655
197 BS 38	18	111	85	214	0	00.00%	163	163
218 BS 33	137	675	402	1214	0	00.00%	708	708
219 BS 42	6	115	91	212	0	00.00%	142	142
220 BS 34	9	83	46	138	0	00.00%	121	121
221 BS 33	87	368	318	773	0	00.00%	577	577
223 BS 33	98	460	357	915	0	00.00%	542	542
224 BS 33	119	564	415	1098	0	00.00%	627	627
225 BS 35	66	697	429	1192	0	00.00%	935	935
226 BS 35	58	348	281	687	0	00.00%	450	450
227 BS 34	82	608	329	1019	0	00.00%	781	781
228 BS 34	69	747	417	1233	0	00.00%	988	988
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	160	160
258 BS 34	43	410	304	757	0	00.00%	601	601
263 BS 58	93	1140	770	2003	0	00.00%	1602	1602
274 BS 33	22	106	198	326	0	00.00%	248	248
275 BS 33	27	61	55	143	0	00.00%	109	109
276 BS 33	70	381	313	764	0	00.00%	497	497
277 BS 34	44	533	262	839	0	00.00%	654	654

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Clerk

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John D. Kinard	Totals
278 BS 34	64	549	329	942	0	00.00%	730	730
279 BS 34	21	201	148	370	0	00.00%	307	307
280 BS 35	0	32	16	48	0	00.00%	30	30
281 BS 35	2	48	34	84	0	00.00%	64	64
283 BS 34	10	75	32	117	0	00.00%	85	85
301 BS 50	9	163	125	297	0	00.00%	139	139
306 BS 50	130	724	519	1373	0	00.00%	660	660
309 BS 39	11	18	10	39	0	00.00%	26	26
311 BS 39	21	109	98	228	0	00.00%	43	43
314 BS 39	157	566	484	1207	0	00.00%	325	325
315 BS 50	139	547	425	1111	0	00.00%	429	429
316 BS 39	71	235	235	541	0	00.00%	197	197
330 BS 48	48	260	157	465	0	00.00%	175	175
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	60	60
334 BS 63	37	188	121	346	0	00.00%	65	65
336 BS 39	218	763	510	1491	0	00.00%	185	185
338 BS 50	102	562	368	1032	0	00.00%	444	444
340 BS 19	21	94	45	160	0	00.00%	17	17
341 BS 19	23	157	143	323	0	00.00%	193	193
343 BS 38	30	213	195	438	0	00.00%	204	204
345 BS 39	24	113	98	235	0	00.00%	36	36
347 BS 38	44	167	118	329	0	00.00%	96	96
389 BS 19	13	108	54	175	0	00.00%	64	64
391 BS 19	3	10	11	24	0	00.00%	15	15
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	65	65
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1042	1042
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	965	965
454 BS 66	109	835	498	1442	0	00.00%	1040	1040
455 BS 55	0	6	5	11	0	00.00%	8	8
456 BS 46	155	937	459	1551	0	00.00%	1292	1292
457 BS 46	159	1059	613	1831	0	00.00%	1551	1551
460 BS 46	143	1424	679	2246	0	00.00%	1881	1881
461 BS 46	60	840	539	1439	0	00.00%	1195	1195
462 BS 46	66	884	496	1446	0	00.00%	1221	1221
464 BS 55	125	654	388	1167	0	00.00%	925	925

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

District Clerk

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP John D. Kinard	Totals
471 BS 46	3	49	14	66	0	00.00%	46	46
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1313	1313
488 BS 55	38	314	244	596	0	00.00%	487	487
490 BS 69	68	504	389	961	0	00.00%	754	754
166 BS 57	83	527	423	1033	0	00.00%	769	769
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	226	226
219 BS 43	10	51	57	118	0	00.00%	35	35
219 BS 44	1	8	8	17	0	00.00%	12	12
219 BS 45	10	58	48	116	0	00.00%	65	65
220 BS 35	12	124	95	231	0	00.00%	169	169
220 BS 53	43	435	402	880	0	00.00%	613	613
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	105	105
232 BS 67	7	22	11	40	0	00.00%	21	21
232 BS 68	38	240	143	421	0	00.00%	212	212
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	237	237
283 BS 53	20	297	315	632	0	00.00%	447	447
330 BS 49	24	161	127	312	0	00.00%	133	133
331 BS 48	8	27	18	53	0	00.00%	22	22
331 BS 49	6	7	4	17	0	00.00%	9	9
331 BS 65	83	394	232	709	0	00.00%	167	167
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	10	10
399 BS 31	3	22	14	39	0	00.00%	13	13
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	7	7
455 BS 56	102	356	234	692	0	00.00%	491	491
471 BS 66	21	402	266	689	0	00.00%	508	508
482 BS 61	2	9	3	14	0	00.00%	12	12
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	591	591
490 BS 70	42	222	193	457	0	00.00%	363	363
226 BS 34	3	64	21	88	0	00.00%	78	78
Totals	5221	35771	23958	64950	0		44130	44130

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Clerk

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Dwight D. Sullivan	Totals
103 BS 39	14	151	83	248	0	00.00%	178	178
103 BS 76	9	59	58	126	0	00.00%	97	97
104 BS 39	10	164	113	287	0	00.00%	214	214
105 BS 39	3	19	13	35	0	00.00%	28	28
105-1 BS 50	22	79	79	180	0	00.00%	105	105
142 BS 38	63	411	277	751	0	00.00%	451	451
144 BS 57	79	465	273	817	0	00.00%	589	589
146 BS 38	65	461	331	857	0	00.00%	568	568
148 BS 38	132	641	444	1217	0	00.00%	827	827
150 BS 38	50	419	267	736	0	00.00%	484	484
151 BS 38	54	542	413	1009	0	00.00%	782	782
152 BS 47	149	1196	665	2010	0	00.00%	1603	1603
159 BS 38	58	571	421	1050	0	00.00%	761	761
165 BS 41	43	420	384	847	0	00.00%	657	657
166 BS 47	2	2	1	5	0	00.00%	4	4
167 BS 47	170	953	514	1637	0	00.00%	1314	1314
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	862	862
172 BS 38	14	111	69	194	0	00.00%	139	139
192 BS 19	13	99	68	180	0	00.00%	130	130
193 BS 47	63	417	364	844	0	00.00%	654	654
197 BS 38	18	111	85	214	0	00.00%	164	164
218 BS 33	137	675	402	1214	0	00.00%	705	705
219 BS 42	6	115	91	212	0	00.00%	141	141
220 BS 34	9	83	46	138	0	00.00%	123	123
221 BS 33	87	368	318	773	0	00.00%	579	579
223 BS 33	98	460	357	915	0	00.00%	551	551
224 BS 33	119	564	415	1098	0	00.00%	638	638
225 BS 35	66	697	429	1192	0	00.00%	939	939
226 BS 35	58	348	281	687	0	00.00%	453	453
227 BS 34	82	608	329	1019	0	00.00%	786	786
228 BS 34	69	747	417	1233	0	00.00%	990	990
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	159	159
258 BS 34	43	410	304	757	0	00.00%	604	604
263 BS 58	93	1140	770	2003	0	00.00%	1607	1607
274 BS 33	22	106	198	326	0	00.00%	249	249
275 BS 33	27	61	55	143	0	00.00%	109	109
276 BS 33	70	381	313	764	0	00.00%	498	498
277 BS 34	44	533	262	839	0	00.00%	655	655

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Clerk

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Dwight D. Sullivan	Totals
278 BS 34	64	549	329	942	0	00.00%	740	740
279 BS 34	21	201	148	370	0	00.00%	308	308
280 BS 35	0	32	16	48	0	00.00%	30	30
281 BS 35	2	48	34	84	0	00.00%	63	63
283 BS 34	10	75	32	117	0	00.00%	86	86
301 BS 50	9	163	125	297	0	00.00%	141	141
306 BS 50	130	724	519	1373	0	00.00%	660	660
309 BS 39	11	18	10	39	0	00.00%	26	26
311 BS 39	21	109	98	228	0	00.00%	46	46
314 BS 39	157	566	484	1207	0	00.00%	332	332
315 BS 50	139	547	425	1111	0	00.00%	433	433
316 BS 39	71	235	235	541	0	00.00%	205	205
330 BS 48	48	260	157	465	0	00.00%	173	173
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	59	59
334 BS 63	37	188	121	346	0	00.00%	66	66
336 BS 39	218	763	510	1491	0	00.00%	193	193
338 BS 50	102	562	368	1032	0	00.00%	451	451
340 BS 19	21	94	45	160	0	00.00%	18	18
341 BS 19	23	157	143	323	0	00.00%	196	196
343 BS 38	30	213	195	438	0	00.00%	208	208
345 BS 39	24	113	98	235	0	00.00%	36	36
347 BS 38	44	167	118	329	0	00.00%	100	100
389 BS 19	13	108	54	175	0	00.00%	65	65
391 BS 19	3	10	11	24	0	00.00%	16	16
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	64	64
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1041	1041
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	964	964
454 BS 66	109	835	498	1442	0	00.00%	1048	1048
455 BS 55	0	6	5	11	0	00.00%	8	8
456 BS 46	155	937	459	1551	0	00.00%	1286	1286
457 BS 46	159	1059	613	1831	0	00.00%	1554	1554
460 BS 46	143	1424	679	2246	0	00.00%	1877	1877
461 BS 46	60	840	539	1439	0	00.00%	1191	1191
462 BS 46	66	884	496	1446	0	00.00%	1219	1219
464 BS 55	125	654	388	1167	0	00.00%	927	927

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Clerk

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Dwight D. Sullivan	Totals
471 BS 46	3	49	14	66	0	00.00%	47	47
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1315	1315
488 BS 55	38	314	244	596	0	00.00%	488	488
490 BS 69	68	504	389	961	0	00.00%	761	761
166 BS 57	83	527	423	1033	0	00.00%	771	771
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	225	225
219 BS 43	10	51	57	118	0	00.00%	37	37
219 BS 44	1	8	8	17	0	00.00%	12	12
219 BS 45	10	58	48	116	0	00.00%	66	66
220 BS 35	12	124	95	231	0	00.00%	168	168
220 BS 53	43	435	402	880	0	00.00%	617	617
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	106	106
232 BS 67	7	22	11	40	0	00.00%	22	22
232 BS 68	38	240	143	421	0	00.00%	217	217
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	240	240
283 BS 53	20	297	315	632	0	00.00%	447	447
330 BS 49	24	161	127	312	0	00.00%	132	132
331 BS 48	8	27	18	53	0	00.00%	21	21
331 BS 49	6	7	4	17	0	00.00%	9	9
331 BS 65	83	394	232	709	0	00.00%	169	169
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	10	10
399 BS 31	3	22	14	39	0	00.00%	12	12
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	8	8
455 BS 56	102	356	234	692	0	00.00%	495	495
471 BS 66	21	402	266	689	0	00.00%	502	502
482 BS 61	2	9	3	14	0	00.00%	12	12
482 BS 62	6	16	6	28	0	00.00%	24	24
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	593	593
490 BS 70	42	222	193	457	0	00.00%	362	362
226 BS 34	3	64	21	88	0	00.00%	80	80
Totals	5221	35771	23958	64950	0		44269	44269

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Treasurer

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kevin C. Walsh	Totals
103 BS 39	14	151	83	248	0	00.00%	179	179
103 BS 76	9	59	58	126	0	00.00%	94	94
104 BS 39	10	164	113	287	0	00.00%	211	211
105 BS 39	3	19	13	35	0	00.00%	28	28
105-1 BS 50	22	79	79	180	0	00.00%	107	107
142 BS 38	63	411	277	751	0	00.00%	448	448
144 BS 57	79	465	273	817	0	00.00%	585	585
146 BS 38	65	461	331	857	0	00.00%	567	567
148 BS 38	132	641	444	1217	0	00.00%	805	805
150 BS 38	50	419	267	736	0	00.00%	476	476
151 BS 38	54	542	413	1009	0	00.00%	776	776
152 BS 47	149	1196	665	2010	0	00.00%	1599	1599
159 BS 38	58	571	421	1050	0	00.00%	759	759
165 BS 41	43	420	384	847	0	00.00%	652	652
166 BS 47	2	2	1	5	0	00.00%	5	5
167 BS 47	170	953	514	1637	0	00.00%	1313	1313
168 BS 39	0	0	0	0	0	00.00%	0	0
170 BS 47	41	618	433	1092	0	00.00%	861	861
172 BS 38	14	111	69	194	0	00.00%	138	138
192 BS 19	13	99	68	180	0	00.00%	129	129
193 BS 47	63	417	364	844	0	00.00%	652	652
197 BS 38	18	111	85	214	0	00.00%	163	163
218 BS 33	137	675	402	1214	0	00.00%	697	697
219 BS 42	6	115	91	212	0	00.00%	139	139
220 BS 34	9	83	46	138	0	00.00%	121	121
221 BS 33	87	368	318	773	0	00.00%	571	571
223 BS 33	98	460	357	915	0	00.00%	537	537
224 BS 33	119	564	415	1098	0	00.00%	630	630
225 BS 35	66	697	429	1192	0	00.00%	934	934
226 BS 35	58	348	281	687	0	00.00%	449	449
227 BS 34	82	608	329	1019	0	00.00%	783	783
228 BS 34	69	747	417	1233	0	00.00%	986	986
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	158	158
258 BS 34	43	410	304	757	0	00.00%	602	602
263 BS 58	93	1140	770	2003	0	00.00%	1604	1604
274 BS 33	22	106	198	326	0	00.00%	250	250
275 BS 33	27	61	55	143	0	00.00%	109	109
276 BS 33	70	381	313	764	0	00.00%	491	491
277 BS 34	44	533	262	839	0	00.00%	655	655

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Treasurer

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kevin C. Walsh	Totals
278 BS 34	64	549	329	942	0	00.00%	732	732
279 BS 34	21	201	148	370	0	00.00%	306	306
280 BS 35	0	32	16	48	0	00.00%	31	31
281 BS 35	2	48	34	84	0	00.00%	63	63
283 BS 34	10	75	32	117	0	00.00%	84	84
301 BS 50	9	163	125	297	0	00.00%	140	140
306 BS 50	130	724	519	1373	0	00.00%	665	665
309 BS 39	11	18	10	39	0	00.00%	21	21
311 BS 39	21	109	98	228	0	00.00%	45	45
314 BS 39	157	566	484	1207	0	00.00%	315	315
315 BS 50	139	547	425	1111	0	00.00%	420	420
316 BS 39	71	235	235	541	0	00.00%	200	200
330 BS 48	48	260	157	465	0	00.00%	174	174
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
331-1 BS 51	7	73	39	119	0	00.00%	59	59
334 BS 63	37	188	121	346	0	00.00%	64	64
336 BS 39	218	763	510	1491	0	00.00%	186	186
338 BS 50	102	562	368	1032	0	00.00%	443	443
340 BS 19	21	94	45	160	0	00.00%	18	18
341 BS 19	23	157	143	323	0	00.00%	190	190
343 BS 38	30	213	195	438	0	00.00%	206	206
345 BS 39	24	113	98	235	0	00.00%	36	36
347 BS 38	44	167	118	329	0	00.00%	99	99
389 BS 19	13	108	54	175	0	00.00%	63	63
391 BS 19	3	10	11	24	0	00.00%	16	16
394 BS 38	0	6	8	14	0	00.00%	8	8
398 BS 19	3	67	40	110	0	00.00%	63	63
399 BS 19	0	0	1	1	0	00.00%	1	1
439 BS 46	137	862	427	1426	0	00.00%	1036	1036
439-1 BS 52	0	14	1	15	0	00.00%	13	13
453 BS 72	140	643	483	1266	0	00.00%	956	956
454 BS 66	109	835	498	1442	0	00.00%	1033	1033
455 BS 55	0	6	5	11	0	00.00%	8	8
456 BS 46	155	937	459	1551	0	00.00%	1289	1289
457 BS 46	159	1059	613	1831	0	00.00%	1548	1548
460 BS 46	143	1424	679	2246	0	00.00%	1878	1878
461 BS 46	60	840	539	1439	0	00.00%	1194	1194
462 BS 46	66	884	496	1446	0	00.00%	1219	1219
464 BS 55	125	654	388	1167	0	00.00%	920	920

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Treasurer

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Kevin C. Walsh	Totals
471 BS 46	3	49	14	66	0	00.00%	46	46
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1306	1306
488 BS 55	38	314	244	596	0	00.00%	487	487
490 BS 69	68	504	389	961	0	00.00%	753	753
166 BS 57	83	527	423	1033	0	00.00%	769	769
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	224	224
219 BS 43	10	51	57	118	0	00.00%	36	36
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	65	65
220 BS 35	12	124	95	231	0	00.00%	170	170
220 BS 53	43	435	402	880	0	00.00%	609	609
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	105	105
232 BS 67	7	22	11	40	0	00.00%	21	21
232 BS 68	38	240	143	421	0	00.00%	215	215
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	237	237
283 BS 53	20	297	315	632	0	00.00%	443	443
330 BS 49	24	161	127	312	0	00.00%	132	132
331 BS 48	8	27	18	53	0	00.00%	22	22
331 BS 49	6	7	4	17	0	00.00%	9	9
331 BS 65	83	394	232	709	0	00.00%	166	166
331 BS 64	0	13	7	20	0	00.00%	11	11
399 BS 28	2	10	6	18	0	00.00%	11	11
399 BS 31	3	22	14	39	0	00.00%	13	13
453 BS 73	1	19	7	27	0	00.00%	20	20
454 BS 72	1	4	4	9	0	00.00%	7	7
455 BS 56	102	356	234	692	0	00.00%	492	492
471 BS 66	21	402	266	689	0	00.00%	500	500
482 BS 61	2	9	3	14	0	00.00%	12	12
482 BS 62	6	16	6	28	0	00.00%	23	23
487 BS 66	1	12	7	20	0	00.00%	16	16
488 BS 56	43	439	298	780	0	00.00%	588	588
490 BS 70	42	222	193	457	0	00.00%	361	361
226 BS 34	3	64	21	88	0	00.00%	79	79
Totals	5221	35771	23958	64950	0		43969	43969

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Commissioner, Precinct No. 2

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Joe Giusti	Totals
218 BS 33	137	675	402	1214	0	00.00%	748	748
219 BS 42	6	115	91	212	0	00.00%	141	141
220 BS 34	9	83	46	138	0	00.00%	122	122
221 BS 33	87	368	318	773	0	00.00%	580	580
223 BS 33	98	460	357	915	0	00.00%	573	573
224 BS 33	119	564	415	1098	0	00.00%	660	660
225 BS 35	66	697	429	1192	0	00.00%	948	948
226 BS 35	58	348	281	687	0	00.00%	463	463
227 BS 34	82	608	329	1019	0	00.00%	803	803
228 BS 34	69	747	417	1233	0	00.00%	1006	1006
232 BS 33	1	0	0	1	0	00.00%	0	0
232-3 BS 37	10	122	53	185	0	00.00%	159	159
258 BS 34	43	410	304	757	0	00.00%	612	612
263 BS 58	93	1140	770	2003	0	00.00%	1601	1601
274 BS 33	22	106	198	326	0	00.00%	250	250
275 BS 33	27	61	55	143	0	00.00%	111	111
276 BS 33	70	381	313	764	0	00.00%	501	501
277 BS 34	44	533	262	839	0	00.00%	671	671
278 BS 34	64	549	329	942	0	00.00%	744	744
279 BS 34	21	201	148	370	0	00.00%	306	306
280 BS 35	0	32	16	48	0	00.00%	32	32
281 BS 35	2	48	34	84	0	00.00%	64	64
283 BS 34	10	75	32	117	0	00.00%	87	87
219 BS 43	10	51	57	118	0	00.00%	38	38
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	67	67
220 BS 35	12	124	95	231	0	00.00%	171	171
220 BS 53	43	435	402	880	0	00.00%	617	617
220 BS 54	0	0	2	2	0	00.00%	0	0
228 BS 35	0	2	0	2	0	00.00%	2	2
232 BS 37	17	94	86	197	0	00.00%	105	105
232 BS 67	7	22	11	40	0	00.00%	23	23
232 BS 68	38	240	143	421	0	00.00%	220	220
277 BS 35	0	0	0	0	0	00.00%	0	0
283 BS 35	26	203	104	333	0	00.00%	239	239
283 BS 53	20	297	315	632	0	00.00%	447	447
226 BS 34	3	64	21	88	0	00.00%	77	77
Totals	1325	9921	6891	18137	0		13199	13199

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

County Commissioner, Precinct No. 4

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Ken Clark	DEM Robert Hutchins	Totals
439 BS 46	137	862	427	1426	0	00.00%	965	421	1386
439-1 BS 52	0	14	1	15	0	00.00%	13	2	15
453 BS 72	140	643	483	1266	0	00.00%	868	351	1219
454 BS 66	109	835	498	1442	0	00.00%	943	447	1390
455 BS 55	0	6	5	11	0	00.00%	8	3	11
456 BS 46	155	937	459	1551	0	00.00%	1229	258	1487
457 BS 46	159	1059	613	1831	0	00.00%	1494	288	1782
460 BS 46	143	1424	679	2246	0	00.00%	1792	397	2189
461 BS 46	60	840	539	1439	0	00.00%	1145	254	1399
462 BS 46	66	884	496	1446	0	00.00%	1160	250	1410
464 BS 55	125	654	388	1167	0	00.00%	847	291	1138
471 BS 46	3	49	14	66	0	00.00%	41	21	62
482 BS 60	0	0	0	0	0	00.00%	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1194	484	1678
488 BS 55	38	314	244	596	0	00.00%	438	141	579
490 BS 69	68	504	389	961	0	00.00%	694	237	931
453 BS 73	1	19	7	27	0	00.00%	19	7	26
454 BS 72	1	4	4	9	0	00.00%	5	3	8
455 BS 56	102	356	234	692	0	00.00%	450	219	669
471 BS 66	21	402	266	689	0	00.00%	458	209	667
482 BS 61	2	9	3	14	0	00.00%	13	1	14
482 BS 62	6	16	6	28	0	00.00%	23	5	28
487 BS 66	1	12	7	20	0	00.00%	15	3	18
488 BS 56	43	439	298	780	0	00.00%	551	203	754
490 BS 70	42	222	193	457	0	00.00%	337	114	451
Totals	1476	11449	6987	19912	0		14702	4609	19311

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice of the Peace, Precinct No. 1

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Alison Cox	Totals
142 BS 38	63	411	277	751	0	00.00%	450	450
144 BS 57	79	465	273	817	0	00.00%	594	594
146 BS 38	65	461	331	857	0	00.00%	573	573
148 BS 38	132	641	444	1217	0	00.00%	825	825
150 BS 38	50	419	267	736	0	00.00%	486	486
151 BS 38	54	542	413	1009	0	00.00%	782	782
152 BS 47	149	1196	665	2010	0	00.00%	1598	1598
159 BS 38	58	571	421	1050	0	00.00%	752	752
165 BS 41	43	420	384	847	0	00.00%	664	664
166 BS 47	2	2	1	5	0	00.00%	4	4
167 BS 47	170	953	514	1637	0	00.00%	1291	1291
170 BS 47	41	618	433	1092	0	00.00%	863	863
172 BS 38	14	111	69	194	0	00.00%	141	141
193 BS 47	63	417	364	844	0	00.00%	656	656
197 BS 38	18	111	85	214	0	00.00%	166	166
343 BS 38	30	213	195	438	0	00.00%	207	207
347 BS 38	44	167	118	329	0	00.00%	102	102
394 BS 38	0	6	8	14	0	00.00%	8	8
490 BS 69	68	504	389	961	0	00.00%	755	755
166 BS 57	83	527	423	1033	0	00.00%	766	766
167 BS 57	0	3	0	3	0	00.00%	3	3
167 BS 77	28	185	90	303	0	00.00%	223	223
490 BS 70	42	222	193	457	0	00.00%	364	364
Totals	1296	9165	6357	16818	0		12273	12273

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice of the Peace, Precinct No. 2

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jim Schweitzer	DEM M. W. "Mike" Nelson	Totals
105-1 BS 50	22	79	79	180	0	00.00%	113	58	171
218 BS 33	137	675	402	1214	0	00.00%	791	396	1187
220 BS 34	9	83	46	138	0	00.00%	109	29	138
221 BS 33	87	368	318	773	0	00.00%	591	166	757
223 BS 33	98	460	357	915	0	00.00%	622	267	889
224 BS 33	119	564	415	1098	0	00.00%	654	420	1074
225 BS 35	66	697	429	1192	0	00.00%	839	321	1160
226 BS 35	58	348	281	687	0	00.00%	299	376	675
227 BS 34	82	608	329	1019	0	00.00%	520	474	994
228 BS 34	69	747	417	1233	0	00.00%	650	562	1212
232 BS 33	1	0	0	1	0	00.00%	0	0	0
232-3 BS 37	10	122	53	185	0	00.00%	150	33	183
258 BS 34	43	410	304	757	0	00.00%	388	359	747
274 BS 33	22	106	198	326	0	00.00%	246	73	319
275 BS 33	27	61	55	143	0	00.00%	111	30	141
276 BS 33	70	381	313	764	0	00.00%	485	251	736
277 BS 34	44	533	262	839	0	00.00%	377	448	825
278 BS 34	64	549	329	942	0	00.00%	414	513	927
279 BS 34	21	201	148	370	0	00.00%	225	135	360
280 BS 35	0	32	16	48	0	00.00%	26	21	47
281 BS 35	2	48	34	84	0	00.00%	57	23	80
283 BS 34	10	75	32	117	0	00.00%	77	35	112
301 BS 50	9	163	125	297	0	00.00%	118	170	288
306 BS 50	130	724	519	1373	0	00.00%	647	665	1312
315 BS 50	139	547	425	1111	0	00.00%	441	628	1069
331-1 BS 51	7	73	39	119	0	00.00%	44	73	117
338 BS 50	102	562	368	1032	0	00.00%	351	655	1006
439-1 BS 52	0	14	1	15	0	00.00%	13	2	15
482 BS 60	0	0	0	0	0	00.00%	0	0	0
220 BS 35	12	124	95	231	0	00.00%	148	79	227
220 BS 53	43	435	402	880	0	00.00%	550	301	851
220 BS 54	0	0	2	2	0	00.00%	0	2	2
228 BS 35	0	2	0	2	0	00.00%	2	0	2
232 BS 37	17	94	86	197	0	00.00%	84	106	190
232 BS 67	7	22	11	40	0	00.00%	19	21	40
232 BS 68	38	240	143	421	0	00.00%	180	230	410
277 BS 35	0	0	0	0	0	00.00%	0	0	0
283 BS 35	26	203	104	333	0	00.00%	209	108	317
283 BS 53	20	297	315	632	0	00.00%	391	223	614
482 BS 61	2	9	3	14	0	00.00%	12	2	14

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice of the Peace, Precinct No. 2

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	REP Jim Schweitzer	DEM M. W. "Mike" Nelson	Totals
482 BS 62	6	16	6	28	0	00.00%	22	6	28
226 BS 34	3	64	21	88	0	00.00%	59	26	85
Totals	1622	10736	7482	19840	0		11034	8287	19321

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Justice of the Peace, Precinct No. 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	DEM Penny L. Pope	Totals
103 BS 39	14	151	83	248	0	00.00%	111	111
103 BS 76	9	59	58	126	0	00.00%	69	69
104 BS 39	10	164	113	287	0	00.00%	118	118
105 BS 39	3	19	13	35	0	00.00%	16	16
168 BS 39	0	0	0	0	0	00.00%	0	0
219 BS 42	6	115	91	212	0	00.00%	103	103
309 BS 39	11	18	10	39	0	00.00%	18	18
311 BS 39	21	109	98	228	0	00.00%	193	193
314 BS 39	157	566	484	1207	0	00.00%	957	957
316 BS 39	71	235	235	541	0	00.00%	417	417
330 BS 48	48	260	157	465	0	00.00%	346	346
330-1 BS 63	0	0	0	0	0	00.00%	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0
334 BS 63	37	188	121	346	0	00.00%	307	307
336 BS 39	218	763	510	1491	0	00.00%	1379	1379
345 BS 39	24	113	98	235	0	00.00%	213	213
219 BS 43	10	51	57	118	0	00.00%	85	85
219 BS 44	1	8	8	17	0	00.00%	11	11
219 BS 45	10	58	48	116	0	00.00%	74	74
330 BS 49	24	161	127	312	0	00.00%	213	213
331 BS 48	8	27	18	53	0	00.00%	40	40
331 BS 49	6	7	4	17	0	00.00%	12	12
331 BS 65	83	394	232	709	0	00.00%	610	610
331 BS 64	0	13	7	20	0	00.00%	13	13
Totals	771	3479	2572	6822	0		5305	5305

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

No. 1

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	For	Against	Totals
103 BS 39	14	151	83	248	0	00.00%	156	36	192
103 BS 76	9	59	58	126	0	00.00%	84	18	102
104 BS 39	10	164	113	287	0	00.00%	180	40	220
105 BS 39	3	19	13	35	0	00.00%	23	8	31
105-1 BS 50	22	79	79	180	0	00.00%	132	19	151
142 BS 38	63	411	277	751	0	00.00%	419	111	530
144 BS 57	79	465	273	817	0	00.00%	500	124	624
146 BS 38	65	461	331	857	0	00.00%	535	129	664
148 BS 38	132	641	444	1217	0	00.00%	782	185	967
150 BS 38	50	419	267	736	0	00.00%	429	117	546
151 BS 38	54	542	413	1009	0	00.00%	596	181	777
152 BS 47	149	1196	665	2010	0	00.00%	1386	329	1715
159 BS 38	58	571	421	1050	0	00.00%	641	175	816
165 BS 41	43	420	384	847	0	00.00%	554	149	703
166 BS 47	2	2	1	5	0	00.00%	2	2	4
167 BS 47	170	953	514	1637	0	00.00%	1089	253	1342
168 BS 39	0	0	0	0	0	00.00%	0	0	0
170 BS 47	41	618	433	1092	0	00.00%	757	180	937
172 BS 38	14	111	69	194	0	00.00%	114	35	149
192 BS 19	13	99	68	180	0	00.00%	122	28	150
193 BS 47	63	417	364	844	0	00.00%	584	145	729
197 BS 38	18	111	85	214	0	00.00%	133	29	162
218 BS 33	137	675	402	1214	0	00.00%	857	154	1011
219 BS 42	6	115	91	212	0	00.00%	135	37	172
220 BS 34	9	83	46	138	0	00.00%	87	19	106
221 BS 33	87	368	318	773	0	00.00%	540	106	646
223 BS 33	98	460	357	915	0	00.00%	625	140	765
224 BS 33	119	564	415	1098	0	00.00%	794	122	916
225 BS 35	66	697	429	1192	0	00.00%	762	183	945
226 BS 35	58	348	281	687	0	00.00%	421	82	503
227 BS 34	82	608	329	1019	0	00.00%	627	187	814
228 BS 34	69	747	417	1233	0	00.00%	767	207	974
232 BS 33	1	0	0	1	0	00.00%	1	0	1
232-3 BS 37	10	122	53	185	0	00.00%	117	36	153
258 BS 34	43	410	304	757	0	00.00%	440	163	603
263 BS 58	93	1140	770	2003	0	00.00%	1366	328	1694
274 BS 33	22	106	198	326	0	00.00%	217	50	267
275 BS 33	27	61	55	143	0	00.00%	100	19	119
276 BS 33	70	381	313	764	0	00.00%	565	95	660
277 BS 34	44	533	262	839	0	00.00%	495	165	660

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

No. 1

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	For	Against	Totals
278 BS 34	64	549	329	942	0	00.00%	586	189	775
279 BS 34	21	201	148	370	0	00.00%	196	85	281
280 BS 35	0	32	16	48	0	00.00%	30	11	41
281 BS 35	2	48	34	84	0	00.00%	43	14	57
283 BS 34	10	75	32	117	0	00.00%	77	25	102
301 BS 50	9	163	125	297	0	00.00%	176	50	226
306 BS 50	130	724	519	1373	0	00.00%	909	157	1066
309 BS 39	11	18	10	39	0	00.00%	27	9	36
311 BS 39	21	109	98	228	0	00.00%	110	27	137
314 BS 39	157	566	484	1207	0	00.00%	666	151	817
315 BS 50	139	547	425	1111	0	00.00%	691	150	841
316 BS 39	71	235	235	541	0	00.00%	305	60	365
330 BS 48	48	260	157	465	0	00.00%	245	62	307
330-1 BS 63	0	0	0	0	0	00.00%	0	0	0
331 BS 39	0	0	0	0	0	00.00%	0	0	0
331-1 BS 51	7	73	39	119	0	00.00%	70	14	84
334 BS 63	37	188	121	346	0	00.00%	144	50	194
336 BS 39	218	763	510	1491	0	00.00%	749	173	922
338 BS 50	102	562	368	1032	0	00.00%	587	139	726
340 BS 19	21	94	45	160	0	00.00%	80	18	98
341 BS 19	23	157	143	323	0	00.00%	195	54	249
343 BS 38	30	213	195	438	0	00.00%	237	75	312
345 BS 39	24	113	98	235	0	00.00%	117	21	138
347 BS 38	44	167	118	329	0	00.00%	156	53	209
389 BS 19	13	108	54	175	0	00.00%	103	20	123
391 BS 19	3	10	11	24	0	00.00%	13	2	15
394 BS 38	0	6	8	14	0	00.00%	5	1	6
398 BS 19	3	67	40	110	0	00.00%	57	22	79
399 BS 19	0	0	1	1	0	00.00%	1	0	1
439 BS 46	137	862	427	1426	0	00.00%	911	204	1115
439-1 BS 52	0	14	1	15	0	00.00%	8	3	11
453 BS 72	140	643	483	1266	0	00.00%	860	200	1060
454 BS 66	109	835	498	1442	0	00.00%	1002	233	1235
455 BS 55	0	6	5	11	0	00.00%	8	1	9
456 BS 46	155	937	459	1551	0	00.00%	1023	223	1246
457 BS 46	159	1059	613	1831	0	00.00%	1171	258	1429
460 BS 46	143	1424	679	2246	0	00.00%	1510	342	1852
461 BS 46	60	840	539	1439	0	00.00%	935	228	1163
462 BS 46	66	884	496	1446	0	00.00%	982	187	1169
464 BS 55	125	654	388	1167	0	00.00%	849	165	1014

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

No. 1

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	For	Against	Totals
471 BS 46	3	49	14	66	0	00.00%	39	13	52
482 BS 60	0	0	0	0	0	00.00%	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1206	269	1475
488 BS 55	38	314	244	596	0	00.00%	423	85	508
490 BS 69	68	504	389	961	0	00.00%	686	136	822
166 BS 57	83	527	423	1033	0	00.00%	664	176	840
167 BS 57	0	3	0	3	0	00.00%	0	1	1
167 BS 77	28	185	90	303	0	00.00%	198	54	252
219 BS 43	10	51	57	118	0	00.00%	68	20	88
219 BS 44	1	8	8	17	0	00.00%	13	3	16
219 BS 45	10	58	48	116	0	00.00%	80	18	98
220 BS 35	12	124	95	231	0	00.00%	162	30	192
220 BS 53	43	435	402	880	0	00.00%	592	132	724
220 BS 54	0	0	2	2	0	00.00%	2	0	2
228 BS 35	0	2	0	2	0	00.00%	1	1	2
232 BS 37	17	94	86	197	0	00.00%	127	30	157
232 BS 67	7	22	11	40	0	00.00%	25	5	30
232 BS 68	38	240	143	421	0	00.00%	277	61	338
277 BS 35	0	0	0	0	0	00.00%	0	0	0
283 BS 35	26	203	104	333	0	00.00%	214	54	268
283 BS 53	20	297	315	632	0	00.00%	426	108	534
330 BS 49	24	161	127	312	0	00.00%	163	43	206
331 BS 48	8	27	18	53	0	00.00%	29	12	41
331 BS 49	6	7	4	17	0	00.00%	12	1	13
331 BS 65	83	394	232	709	0	00.00%	323	109	432
331 BS 64	0	13	7	20	0	00.00%	11	2	13
399 BS 28	2	10	6	18	0	00.00%	12	2	14
399 BS 31	3	22	14	39	0	00.00%	21	5	26
453 BS 73	1	19	7	27	0	00.00%	14	3	17
454 BS 72	1	4	4	9	0	00.00%	5	1	6
455 BS 56	102	356	234	692	0	00.00%	488	93	581
471 BS 66	21	402	266	689	0	00.00%	473	114	587
482 BS 61	2	9	3	14	0	00.00%	10	3	13
482 BS 62	6	16	6	28	0	00.00%	18	9	27
487 BS 66	1	12	7	20	0	00.00%	18	0	18
488 BS 56	43	439	298	780	0	00.00%	520	127	647
490 BS 70	42	222	193	457	0	00.00%	330	75	405
226 BS 34	3	64	21	88	0	00.00%	58	10	68
Totals	5221	35771	23958	64950	0		41676	9867	51543

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Proposition 1

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Yes	No	Totals
219 BS 42	6	115	91	212	0	00.00%	94	59	153
232-3 BS 37	10	122	53	185	0	00.00%	94	53	147
330 BS 48	48	260	157	465	0	00.00%	222	77	299
331-1 BS 51	7	73	39	119	0	00.00%	67	21	88
219 BS 43	10	51	57	118	0	00.00%	66	19	85
219 BS 45	10	58	48	116	0	00.00%	68	30	98
232 BS 37	17	94	86	197	0	00.00%	110	41	151
232 BS 67	7	22	11	40	0	00.00%	23	6	29
232 BS 68	38	240	143	421	0	00.00%	253	75	328
330 BS 49	24	161	127	312	0	00.00%	148	43	191
331 BS 48	8	27	18	53	0	00.00%	29	7	36
331 BS 49	6	7	4	17	0	00.00%	11	2	13
331 BS 65	83	394	232	709	0	00.00%	314	122	436
331 BS 64	0	13	7	20	0	00.00%	8	4	12
Totals	274	1637	1073	2984	0		1507	559	2066

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Proposition 2

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Yes	No	Totals
219 BS 42	6	115	91	212	0	00.00%	78	73	151
232-3 BS 37	10	122	53	185	0	00.00%	67	80	147
330 BS 48	48	260	157	465	0	00.00%	184	115	299
331-1 BS 51	7	73	39	119	0	00.00%	52	32	84
219 BS 43	10	51	57	118	0	00.00%	51	34	85
219 BS 45	10	58	48	116	0	00.00%	50	48	98
232 BS 37	17	94	86	197	0	00.00%	87	65	152
232 BS 67	7	22	11	40	0	00.00%	19	11	30
232 BS 68	38	240	143	421	0	00.00%	206	118	324
330 BS 49	24	161	127	312	0	00.00%	117	75	192
331 BS 48	8	27	18	53	0	00.00%	24	12	36
331 BS 49	6	7	4	17	0	00.00%	12	2	14
331 BS 65	83	394	232	709	0	00.00%	267	168	435
331 BS 64	0	13	7	20	0	00.00%	8	4	12
Totals	274	1637	1073	2984	0		1222	837	2059

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Proposition 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Yes	No	Totals
219 BS 42	6	115	91	212	0	00.00%	84	68	152
232-3 BS 37	10	122	53	185	0	00.00%	77	72	149
330 BS 48	48	260	157	465	0	00.00%	181	122	303
331-1 BS 51	7	73	39	119	0	00.00%	46	39	85
219 BS 43	10	51	57	118	0	00.00%	46	35	81
219 BS 45	10	58	48	116	0	00.00%	50	48	98
232 BS 37	17	94	86	197	0	00.00%	91	62	153
232 BS 67	7	22	11	40	0	00.00%	17	11	28
232 BS 68	38	240	143	421	0	00.00%	208	117	325
330 BS 49	24	161	127	312	0	00.00%	113	76	189
331 BS 48	8	27	18	53	0	00.00%	23	13	36
331 BS 49	6	7	4	17	0	00.00%	11	2	13
331 BS 65	83	394	232	709	0	00.00%	233	200	433
331 BS 64	0	13	7	20	0	00.00%	8	4	12
Totals	274	1637	1073	2984	0		1188	869	2057

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Proposition 4

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Yes	No	Totals
219 BS 42	6	115	91	212	0	00.00%	112	39	151
232-3 BS 37	10	122	53	185	0	00.00%	93	55	148
330 BS 48	48	260	157	465	0	00.00%	231	75	306
331-1 BS 51	7	73	39	119	0	00.00%	60	26	86
219 BS 43	10	51	57	118	0	00.00%	69	11	80
232 BS 37	17	94	86	197	0	00.00%	119	37	156
232 BS 67	7	22	11	40	0	00.00%	27	2	29
232 BS 68	38	240	143	421	0	00.00%	235	82	317
330 BS 49	24	161	127	312	0	00.00%	144	54	198
331 BS 48	8	27	18	53	0	00.00%	31	6	37
331 BS 49	6	7	4	17	0	00.00%	11	3	14
331 BS 65	83	394	232	709	0	00.00%	327	112	439
331 BS 64	0	13	7	20	0	00.00%	10	3	13
Totals	264	1579	1025	2868	0		1469	505	1974

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Proposition 5

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Yes	No	Totals
219 BS 42	6	115	91	212	0	00.00%	86	68	154
232-3 BS 37	10	122	53	185	0	00.00%	87	62	149
330 BS 48	48	260	157	465	0	00.00%	202	112	314
331-1 BS 51	7	73	39	119	0	00.00%	55	30	85
219 BS 43	10	51	57	118	0	00.00%	55	25	80
219 BS 45	10	58	48	116	0	00.00%	57	41	98
232 BS 37	17	94	86	197	0	00.00%	105	50	155
232 BS 67	7	22	11	40	0	00.00%	16	13	29
232 BS 68	38	240	143	421	0	00.00%	202	115	317
330 BS 49	24	161	127	312	0	00.00%	132	68	200
331 BS 48	8	27	18	53	0	00.00%	26	11	37
331 BS 49	6	7	4	17	0	00.00%	11	3	14
331 BS 65	83	394	232	709	0	00.00%	300	144	444
331 BS 64	0	13	7	20	0	00.00%	10	4	14
Totals	274	1637	1073	2984	0		1344	746	2090

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Proposition 6

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Yes	No	Totals
219 BS 42	6	115	91	212	0	00.00%	123	31	154
232-3 BS 37	10	122	53	185	0	00.00%	121	26	147
330 BS 48	48	260	157	465	0	00.00%	261	47	308
331-1 BS 51	7	73	39	119	0	00.00%	75	10	85
219 BS 43	10	51	57	118	0	00.00%	64	15	79
219 BS 45	10	58	48	116	0	00.00%	73	26	99
232 BS 37	17	94	86	197	0	00.00%	132	20	152
232 BS 67	7	22	11	40	0	00.00%	26	3	29
232 BS 68	38	240	143	421	0	00.00%	266	49	315
330 BS 49	24	161	127	312	0	00.00%	166	37	203
331 BS 48	8	27	18	53	0	00.00%	30	6	36
331 BS 49	6	7	4	17	0	00.00%	12	1	13
331 BS 65	83	394	232	709	0	00.00%	343	99	442
331 BS 64	0	13	7	20	0	00.00%	12	2	14
Totals	274	1637	1073	2984	0		1704	372	2076

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Proposition 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Yes	No	Totals
219 BS 42	6	115	91	212	0	00.00%	110	41	151
232-3 BS 37	10	122	53	185	0	00.00%	102	43	145
330 BS 48	48	260	157	465	0	00.00%	219	81	300
331-1 BS 51	7	73	39	119	0	00.00%	64	20	84
219 BS 43	10	51	57	118	0	00.00%	59	19	78
219 BS 45	10	58	48	116	0	00.00%	62	34	96
232 BS 37	17	94	86	197	0	00.00%	120	31	151
232 BS 67	7	22	11	40	0	00.00%	22	6	28
232 BS 68	38	240	143	421	0	00.00%	241	72	313
330 BS 49	24	161	127	312	0	00.00%	143	48	191
331 BS 48	8	27	18	53	0	00.00%	31	6	37
331 BS 49	6	7	4	17	0	00.00%	12	2	14
331 BS 65	83	394	232	709	0	00.00%	308	119	427
331 BS 64	0	13	7	20	0	00.00%	10	3	13
Totals	274	1637	1073	2984	0		1503	525	2028

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Proposition 8

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Yes	No	Totals
219 BS 42	6	115	91	212	0	00.00%	117	32	149
232-3 BS 37	10	122	53	185	0	00.00%	117	31	148
330 BS 48	48	260	157	465	0	00.00%	253	50	303
331-1 BS 51	7	73	39	119	0	00.00%	70	15	85
219 BS 43	10	51	57	118	0	00.00%	68	15	83
219 BS 45	10	58	48	116	0	00.00%	80	16	96
232 BS 37	17	94	86	197	0	00.00%	137	18	155
232 BS 67	7	22	11	40	0	00.00%	25	4	29
232 BS 68	38	240	143	421	0	00.00%	266	51	317
330 BS 49	24	161	127	312	0	00.00%	159	36	195
331 BS 48	8	27	18	53	0	00.00%	31	5	36
331 BS 49	6	7	4	17	0	00.00%	13	1	14
331 BS 65	83	394	232	709	0	00.00%	339	91	430
331 BS 64	0	13	7	20	0	00.00%	10	3	13
Totals	274	1637	1073	2984	0		1685	368	2053

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Proposition 9

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Yes	No	Totals
219 BS 42	6	115	91	212	0	00.00%	125	26	151
232-3 BS 37	10	122	53	185	0	00.00%	123	25	148
330 BS 48	48	260	157	465	0	00.00%	252	53	305
331-1 BS 51	7	73	39	119	0	00.00%	73	12	85
219 BS 43	10	51	57	118	0	00.00%	71	12	83
219 BS 45	10	58	48	116	0	00.00%	81	15	96
232 BS 37	17	94	86	197	0	00.00%	131	27	158
232 BS 67	7	22	11	40	0	00.00%	20	9	29
232 BS 68	38	240	143	421	0	00.00%	278	45	323
330 BS 49	24	161	127	312	0	00.00%	167	33	200
331 BS 48	8	27	18	53	0	00.00%	32	6	38
331 BS 49	6	7	4	17	0	00.00%	12	2	14
331 BS 65	83	394	232	709	0	00.00%	365	75	440
331 BS 64	0	13	7	20	0	00.00%	11	3	14
Totals	274	1637	1073	2984	0		1741	343	2084

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Proposition 10

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Yes	No	Totals
219 BS 42	6	115	91	212	0	00.00%	109	40	149
232-3 BS 37	10	122	53	185	0	00.00%	111	34	145
330 BS 48	48	260	157	465	0	00.00%	242	71	313
331-1 BS 51	7	73	39	119	0	00.00%	62	23	85
219 BS 43	10	51	57	118	0	00.00%	70	10	80
219 BS 45	10	58	48	116	0	00.00%	78	19	97
232 BS 37	17	94	86	197	0	00.00%	117	36	153
232 BS 67	7	22	11	40	0	00.00%	24	5	29
232 BS 68	38	240	143	421	0	00.00%	250	70	320
330 BS 49	24	161	127	312	0	00.00%	161	44	205
331 BS 48	8	27	18	53	0	00.00%	33	5	38
331 BS 49	6	7	4	17	0	00.00%	11	2	13
331 BS 65	83	394	232	709	0	00.00%	336	122	458
331 BS 64	0	13	7	20	0	00.00%	12	3	15
Totals	274	1637	1073	2984	0		1616	484	2100

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Mayor

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Tim Paulissen	Totals
152 BS 47	149	1196	665	2010	0	00.00%	1402	1402
165 BS 41	43	420	384	847	0	00.00%	565	565
166 BS 47	2	2	1	5	0	00.00%	3	3
167 BS 47	170	953	514	1637	0	00.00%	1101	1101
170 BS 47	41	618	433	1092	0	00.00%	792	792
193 BS 47	63	417	364	844	0	00.00%	612	612
263 BS 58	93	1140	770	2003	0	00.00%	1454	1454
453 BS 72	140	643	483	1266	0	00.00%	838	838
454 BS 66	109	835	498	1442	0	00.00%	1007	1007
455 BS 55	0	6	5	11	0	00.00%	6	6
464 BS 55	125	654	388	1167	0	00.00%	803	803
482 BS 60	0	0	0	0	0	00.00%	0	0
487 BS 55	54	945	734	1733	0	00.00%	1205	1205
488 BS 55	38	314	244	596	0	00.00%	419	419
490 BS 69	68	504	389	961	0	00.00%	692	692
167 BS 77	28	185	90	303	0	00.00%	199	199
220 BS 53	43	435	402	880	0	00.00%	581	581
220 BS 54	0	0	2	2	0	00.00%	0	0
283 BS 53	20	297	315	632	0	00.00%	406	406
399 BS 28	2	10	6	18	0	00.00%	10	10
399 BS 31	3	22	14	39	0	00.00%	16	16
453 BS 73	1	19	7	27	0	00.00%	15	15
454 BS 72	1	4	4	9	0	00.00%	6	6
455 BS 56	102	356	234	692	0	00.00%	456	456
471 BS 66	21	402	266	689	0	00.00%	455	455
482 BS 61	2	9	3	14	0	00.00%	7	7
487 BS 66	1	12	7	20	0	00.00%	14	14
488 BS 56	43	439	298	780	0	00.00%	523	523
490 BS 70	42	222	193	457	0	00.00%	344	344
Totals	1404	11059	7713	20176	0		13931	13931

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Council Position #1

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Dan Becker	N Jay Ewend	Totals
152 BS 47	149	1196	665	2010	0	00.00%	924	540	1464
165 BS 41	43	420	384	847	0	00.00%	383	167	550
166 BS 47	2	2	1	5	0	00.00%	2	1	3
167 BS 47	170	953	514	1637	0	00.00%	672	469	1141
170 BS 47	41	618	433	1092	0	00.00%	529	248	777
193 BS 47	63	417	364	844	0	00.00%	391	186	577
263 BS 58	93	1140	770	2003	0	00.00%	973	389	1362
453 BS 72	140	643	483	1266	0	00.00%	524	391	915
454 BS 66	109	835	498	1442	0	00.00%	696	358	1054
455 BS 55	0	6	5	11	0	00.00%	5	1	6
464 BS 55	125	654	388	1167	0	00.00%	520	285	805
482 BS 60	0	0	0	0	0	00.00%	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	835	365	1200
488 BS 55	38	314	244	596	0	00.00%	280	117	397
490 BS 69	68	504	389	961	0	00.00%	446	225	671
167 BS 77	28	185	90	303	0	00.00%	150	64	214
220 BS 53	43	435	402	880	0	00.00%	387	163	550
220 BS 54	0	0	2	2	0	00.00%	0	1	1
283 BS 53	20	297	315	632	0	00.00%	289	106	395
399 BS 28	2	10	6	18	0	00.00%	6	5	11
399 BS 31	3	22	14	39	0	00.00%	16	3	19
453 BS 73	1	19	7	27	0	00.00%	10	4	14
454 BS 72	1	4	4	9	0	00.00%	3	4	7
455 BS 56	102	356	234	692	0	00.00%	342	136	478
471 BS 66	21	402	266	689	0	00.00%	340	144	484
482 BS 61	2	9	3	14	0	00.00%	7	1	8
487 BS 66	1	12	7	20	0	00.00%	10	4	14
488 BS 56	43	439	298	780	0	00.00%	379	139	518
490 BS 70	42	222	193	457	0	00.00%	249	88	337
Totals	1404	11059	7713	20176	0		9368	4604	13972

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Council Position #2

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Tommy Cones N	Phillip W. Morris N	Totals
152 BS 47	149	1196	665	2010	0	00.00%	920	565	1485
165 BS 41	43	420	384	847	0	00.00%	298	262	560
166 BS 47	2	2	1	5	0	00.00%	2	1	3
167 BS 47	170	953	514	1637	0	00.00%	551	622	1173
170 BS 47	41	618	433	1092	0	00.00%	464	329	793
193 BS 47	63	417	364	844	0	00.00%	302	281	583
263 BS 58	93	1140	770	2003	0	00.00%	726	680	1406
453 BS 72	140	643	483	1266	0	00.00%	505	440	945
454 BS 66	109	835	498	1442	0	00.00%	626	488	1114
455 BS 55	0	6	5	11	0	00.00%	4	3	7
464 BS 55	125	654	388	1167	0	00.00%	448	424	872
482 BS 60	0	0	0	0	0	00.00%	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	651	627	1278
488 BS 55	38	314	244	596	0	00.00%	225	185	410
490 BS 69	68	504	389	961	0	00.00%	381	308	689
167 BS 77	28	185	90	303	0	00.00%	147	76	223
220 BS 53	43	435	402	880	0	00.00%	279	286	565
220 BS 54	0	0	2	2	0	00.00%	1	0	1
283 BS 53	20	297	315	632	0	00.00%	191	217	408
399 BS 28	2	10	6	18	0	00.00%	6	6	12
399 BS 31	3	22	14	39	0	00.00%	7	11	18
453 BS 73	1	19	7	27	0	00.00%	13	3	16
454 BS 72	1	4	4	9	0	00.00%	2	5	7
455 BS 56	102	356	234	692	0	00.00%	300	205	505
471 BS 66	21	402	266	689	0	00.00%	240	261	501
482 BS 61	2	9	3	14	0	00.00%	7	2	9
487 BS 66	1	12	7	20	0	00.00%	10	3	13
488 BS 56	43	439	298	780	0	00.00%	266	267	533
490 BS 70	42	222	193	457	0	00.00%	209	133	342
Totals	1404	11059	7713	20176	0		7781	6690	14471

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Council Position #6

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Keith A. Gross	N Jason Long	N Joanna Sharp Dawson	Totals
152 BS 47	149	1196	665	2010	0	00.00%	656	467	381	1504
165 BS 41	43	420	384	847	0	00.00%	201	190	165	556
166 BS 47	2	2	1	5	0	00.00%	0	2	1	3
167 BS 47	170	953	514	1637	0	00.00%	441	339	391	1171
170 BS 47	41	618	433	1092	0	00.00%	274	320	205	799
193 BS 47	63	417	364	844	0	00.00%	176	243	174	593
263 BS 58	93	1140	770	2003	0	00.00%	410	695	348	1453
453 BS 72	140	643	483	1266	0	00.00%	271	323	357	951
454 BS 66	109	835	498	1442	0	00.00%	334	385	383	1102
455 BS 55	0	6	5	11	0	00.00%	3	2	1	6
464 BS 55	125	654	388	1167	0	00.00%	225	391	257	873
482 BS 60	0	0	0	0	0	00.00%	0	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	366	571	360	1297
488 BS 55	38	314	244	596	0	00.00%	126	206	92	424
490 BS 69	68	504	389	961	0	00.00%	222	292	184	698
167 BS 77	28	185	90	303	0	00.00%	76	89	57	222
220 BS 53	43	435	402	880	0	00.00%	161	226	183	570
220 BS 54	0	0	2	2	0	00.00%	0	0	1	1
283 BS 53	20	297	315	632	0	00.00%	105	174	133	412
399 BS 28	2	10	6	18	0	00.00%	2	5	4	11
399 BS 31	3	22	14	39	0	00.00%	4	9	4	17
453 BS 73	1	19	7	27	0	00.00%	9	6	1	16
454 BS 72	1	4	4	9	0	00.00%	2	0	5	7
455 BS 56	102	356	234	692	0	00.00%	158	190	164	512
471 BS 66	21	402	266	689	0	00.00%	161	186	145	492
482 BS 61	2	9	3	14	0	00.00%	3	4	2	9
487 BS 66	1	12	7	20	0	00.00%	4	5	7	16
488 BS 56	43	439	298	780	0	00.00%	184	237	131	552
490 BS 70	42	222	193	457	0	00.00%	127	131	87	345
Totals	1404	11059	7713	20176	0		4701	5688	4223	14612

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Council Position #7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	Nick Long	Abdul Alsaahii	Totals
152 BS 47	149	1196	665	2010	0	00.00%	1362	269	1631
165 BS 41	43	420	384	847	0	00.00%	507	108	615
166 BS 47	2	2	1	5	0	00.00%	4	0	4
167 BS 47	170	953	514	1637	0	00.00%	1087	170	1257
170 BS 47	41	618	433	1092	0	00.00%	735	135	870
193 BS 47	63	417	364	844	0	00.00%	517	122	639
263 BS 58	93	1140	770	2003	0	00.00%	1275	268	1543
453 BS 72	140	643	483	1266	0	00.00%	807	204	1011
454 BS 66	109	835	498	1442	0	00.00%	912	288	1200
455 BS 55	0	6	5	11	0	00.00%	6	0	6
464 BS 55	125	654	388	1167	0	00.00%	777	142	919
482 BS 60	0	0	0	0	0	00.00%	0	0	0
487 BS 55	54	945	734	1733	0	00.00%	1101	269	1370
488 BS 55	38	314	244	596	0	00.00%	380	70	450
490 BS 69	68	504	389	961	0	00.00%	611	140	751
167 BS 77	28	185	90	303	0	00.00%	194	51	245
220 BS 53	43	435	402	880	0	00.00%	503	109	612
220 BS 54	0	0	2	2	0	00.00%	0	2	2
283 BS 53	20	297	315	632	0	00.00%	344	87	431
399 BS 28	2	10	6	18	0	00.00%	7	6	13
399 BS 31	3	22	14	39	0	00.00%	14	4	18
453 BS 73	1	19	7	27	0	00.00%	17	2	19
454 BS 72	1	4	4	9	0	00.00%	3	4	7
455 BS 56	102	356	234	692	0	00.00%	465	79	544
471 BS 66	21	402	266	689	0	00.00%	396	130	526
482 BS 61	2	9	3	14	0	00.00%	9	2	11
487 BS 66	1	12	7	20	0	00.00%	14	2	16
488 BS 56	43	439	298	780	0	00.00%	490	92	582
490 BS 70	42	222	193	457	0	00.00%	329	43	372
Totals	1404	11059	7713	20176	0		12866	2798	15664

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Trustee Position 3

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Wayne Logan	N Theresa A. Herzog	Totals
219 BS 42	6	115	91	212	0	00.00%	51	67	118
220 BS 34	9	83	46	138	0	00.00%	38	38	76
227 BS 34	82	608	329	1019	0	00.00%	304	431	735
228 BS 34	69	747	417	1233	0	00.00%	357	497	854
258 BS 34	43	410	304	757	0	00.00%	245	283	528
277 BS 34	44	533	262	839	0	00.00%	245	341	586
278 BS 34	64	549	329	942	0	00.00%	306	375	681
279 BS 34	21	201	148	370	0	00.00%	126	111	237
283 BS 34	10	75	32	117	0	00.00%	34	37	71
220 BS 54	0	0	2	2	0	00.00%	0	1	1
482 BS 61	2	9	3	14	0	00.00%	5	3	8
482 BS 62	6	16	6	28	0	00.00%	10	6	16
226 BS 34	3	64	21	88	0	00.00%	36	20	56
Totals	359	3410	1990	5759	0		1757	2210	3967

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Trustee Position 4

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	John Rothermel	Totals
219 BS 42	6	115	91	212	0	00.00%	98	98
220 BS 34	9	83	46	138	0	00.00%	67	67
227 BS 34	82	608	329	1019	0	00.00%	642	642
228 BS 34	69	747	417	1233	0	00.00%	739	739
258 BS 34	43	410	304	757	0	00.00%	463	463
277 BS 34	44	533	262	839	0	00.00%	540	540
278 BS 34	64	549	329	942	0	00.00%	582	582
279 BS 34	21	201	148	370	0	00.00%	207	207
283 BS 34	10	75	32	117	0	00.00%	60	60
220 BS 54	0	0	2	2	0	00.00%	0	0
482 BS 61	2	9	3	14	0	00.00%	6	6
482 BS 62	6	16	6	28	0	00.00%	16	16
226 BS 34	3	64	21	88	0	00.00%	49	49
Totals	359	3410	1990	5759	0		3469	3469

Galveston County — General and Special Election — November 04, 2014

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11/19/2014 08:45 AM

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Trustee Position 5

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Sheryl Skufca	Totals
219 BS 42	6	115	91	212	0	00.00%	101	101
220 BS 34	9	83	46	138	0	00.00%	66	66
227 BS 34	82	608	329	1019	0	00.00%	650	650
228 BS 34	69	747	417	1233	0	00.00%	743	743
258 BS 34	43	410	304	757	0	00.00%	463	463
277 BS 34	44	533	262	839	0	00.00%	516	516
278 BS 34	64	549	329	942	0	00.00%	583	583
279 BS 34	21	201	148	370	0	00.00%	203	203
283 BS 34	10	75	32	117	0	00.00%	63	63
220 BS 54	0	0	2	2	0	00.00%	1	1
482 BS 61	2	9	3	14	0	00.00%	6	6
482 BS 62	6	16	6	28	0	00.00%	16	16
226 BS 34	3	64	21	88	0	00.00%	51	51
Totals	359	3410	1990	5759	0		3462	3462

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Trustee Position 6

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Rusty Norman	Totals
219 BS 42	6	115	91	212	0	00.00%	96	96
220 BS 34	9	83	46	138	0	00.00%	69	69
227 BS 34	82	608	329	1019	0	00.00%	645	645
228 BS 34	69	747	417	1233	0	00.00%	736	736
258 BS 34	43	410	304	757	0	00.00%	452	452
277 BS 34	44	533	262	839	0	00.00%	516	516
278 BS 34	64	549	329	942	0	00.00%	570	570
279 BS 34	21	201	148	370	0	00.00%	201	201
283 BS 34	10	75	32	117	0	00.00%	56	56
220 BS 54	0	0	2	2	0	00.00%	0	0
482 BS 61	2	9	3	14	0	00.00%	6	6
482 BS 62	6	16	6	28	0	00.00%	16	16
226 BS 34	3	64	21	88	0	00.00%	50	50
Totals	359	3410	1990	5759	0		3413	3413

Galveston County — General and Special Election — November 04, 2014

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Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Trustee Position 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Jason O'Brien	N Christopher McCarvell	Totals
219 BS 42	6	115	91	212	0	00.00%	75	36	111
220 BS 34	9	83	46	138	0	00.00%	56	19	75
227 BS 34	82	608	329	1019	0	00.00%	417	307	724
228 BS 34	69	747	417	1233	0	00.00%	514	330	844
258 BS 34	43	410	304	757	0	00.00%	306	215	521
277 BS 34	44	533	262	839	0	00.00%	375	194	569
278 BS 34	64	549	329	942	0	00.00%	369	286	655
279 BS 34	21	201	148	370	0	00.00%	145	87	232
283 BS 34	10	75	32	117	0	00.00%	47	20	67
220 BS 54	0	0	2	2	0	00.00%	0	1	1
482 BS 61	2	9	3	14	0	00.00%	7	1	8
482 BS 62	6	16	6	28	0	00.00%	12	4	16
226 BS 34	3	64	21	88	0	00.00%	32	24	56
Totals	359	3410	1990	5759	0		2355	1524	3879

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Position 1

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Bennie Barrow	Totals
103 BS 76	9	59	58	126	0	00.00%	79	79
Totals	9	59	58	126	0		79	79

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Position 2

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Tony Perea	Totals
103 BS 76	9	59	58	126	0	00.00%	75	75
Totals	9	59	58	126	0		75	75

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Position 5

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Roger George	Totals
103 BS 76	9	59	58	126	0	00.00%	77	77
Totals	9	59	58	126	0		77	77

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Position 6

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Karen Faggard	Totals
103 BS 76	9	59	58	126	0	00.00%	83	83
Totals	9	59	58	126	0		83	83

Galveston County — General and Special Election — November 04, 2014

Total Number of Voters : 64,950 of 0 = 0.00%

Precincts Reporting 118 of 118 = 100.00%

Position 7

Precinct	Absentee Ballots Cast	Early Ballots Cast	Election Ballots Cast	Total Ballots Cast	Registered Voters	Percent Turnout	N Jo E. Ball	N Buffy Diebel	Totals
103 BS 76	9	59	58	126	0	00.00%	33	71	104
Totals	9	59	58	126	0		33	71	104

EXHIBIT 24

*Excerpts of February 28, 2023
Deposition of Cheryl Johnson*

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

HONORABLE TERRY PETTEWAY, §
et al., §
Plaintiffs, §
§
§ CIVIL ACTION
VS. § NO. 3:22-cv-00057
§
GALVESTON COUNTY, et al. §
Defendants. §

ORAL AND VIDEOTAPED DEPOSITION OF
CHERYL JOHNSON
FEBRUARY 28, 2023

ORAL AND VIDEOTAPED DEPOSITION of CHERYL JOHNSON,
produced as a witness at the instance of the Plaintiff(s)
and duly sworn, was taken in the above-styled and
numbered cause on February 28, 2023, from 9:10 a.m. to
5:28 p.m., before Molly Carter, Certified Shorthand
Reporter in and for the State of Texas, reported by
machine shorthand, with all attendees appearing remotely,
pursuant to the Federal Rules of Civil Procedure.

1 A P P E A R A N C E S

2
3 FOR THE NAACP PLAINTIFF(S):

4 Ms. Kathryn Carr Garrett

5 Ms. Molly Linda Zhu

6 Mr. Andrew Silberstein

7 Mr. Richard Mancino

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9 787 Seventh Avenue

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12 kgarrett@willkie.com

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16 Ms. Diana C. Vall-Llobera

17 WILLKIE FARR & GALLAGHER LLP

18 1875 K Street, N.W.

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20 (202) 303-1157

21 dvall-llobera@willkie.com

22 Ms. Sarah Xiyi Chen

23 TEXAS CIVIL RIGHTS PROJECT

24 1405 Montopolis Drive

25 Austin, Texas 78741

(512) 474-5073

schen@texascivilrightsproject.org

FOR THE PETTEWAY PLAINTIFF(S):

Ms. Alexandra Copper

Ms. Valencia Richardson

Mr. DaWuan Norwood

CAMPAIGN LEGAL CENTER

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14

15 FOR THE DEFENDANT(S) GALVESTON COUNTY, TEXAS:

16 Ms. Angela Olalde
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17 League City, Texas 77573
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18 Ms. Jordan Raschke Elton
Mr. Joseph R. Russo, Jr.
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21 jraschke@greerherz.com
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Mr. Mateo Forero
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2300 North Street NW, Suite 643
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mforero@holtzmanvogel.com

ALSO PRESENT:

Mr. Christopher Archie, Videographer
Mr. Thomas Munk, Concierge Tech
Ms. Samantha Perlman, Legal Intern

1 A That's what the ad -- that's what the article
2 states, yes.

3 Q And the article also states in the paragraph
4 right below that this image is one of the first pictures
5 that shows up on a Google search for the gang MS-13. Is
6 that accurate?

7 A Yes.

8 Q Now, looking at Page 4 of the article, the
9 second paragraph, you are quoted as saying that the ad
10 was "despicable, it is vile, and it's a lie," and that
11 you were "offended by it." Is that accurate?

12 A Yes, ma'am.

13 Q Can you tell me, why were you offended by this
14 ad?

15 A It suggests that noncitizens are heavily
16 tattooed gang members and it makes it appear that every
17 Hispanic male or somebody with tattoos is a noncitizen.
18 I think that that's very -- I think that is despicable
19 and vile and as well as being a lie. I know a lot of
20 people with tattoos --

21 Q And --

22 A -- and they're not Hispanic males or gang
23 members or noncitizens.

24 Q And in your -- and in your experience, not
25 every Hispanic person is an illegal immigrant either; is

1 that right?

2 A That's right.

3 Q And referring to your February 21st tweet, you
4 also described this ad as racist. Is that accurate?

5 A As I recall, yes.

6 Q Do you believe today that this ad is racist?

7 A Yes, I do.

8 Q So I know we've discussed the facts that the
9 man identified -- the man pictured is not identified as
10 Hispanic, but that appears to be what is implied; is that
11 correct?

12 A Yes --

13 MS. OLALDE: Objection, calls for speculation,
14 also asked and answered.

15 A Yes. And according to the article -- actually,
16 he's from El Salvador.

17 Q (By Ms. Copper) So not from Galveston County at
18 all?

19 A Correct.

20 Q Have you been the subject of other attacks
21 during any of your campaigns that have invoked fears of
22 illegal immigration or called on racial stereotypes?

23 A I don't recall, although Ms. Peden could have
24 stated that I refused to remove noncitizens from the
25 voter roll. I don't recall any other advertisement that

EXHIBIT 25

*Excerpts of March 30, 2023 Deposition
of Leon Phillips*

Leon Phillips
March 30, 2023

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

TERRY PETTEWAY, THE HONORABLE)	
DERRECK ROSE, MICHAEL MONTEZ,)	
SONNY JAMES and PENNY POPE,)	
)	
Plaintiffs,)	Civil Action
)	No. 3:22-CV-57
vs.))
)	
GALVESTON COUNTY, TEXAS, and)	
HONORABLE MARK HENRY, in his)	
official capacity as Galveston)	
County Judge,)	
)	
Defendants.)	

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Civil Action
vs.)	No. 3:22-CV-93
)	
GALVESTON COUNTY, TEXAS,)	
GALVESTON COUNTY)	
COMMISSIONERS COURT, and)	
HONORABLE MARK HENRY, in his)	
official capacity as Galveston)	
County Judge,)	
)	
Defendants.)	

DICKINSON BAY AREA BRANCH)	
NAACP, GALVESTON BRANCH)	
NAACP, MAINLAND BRANCH)	
NAACP, GALVESTON LULAC)	
COUNCIL 151, EDNA COURVILLE,)	
JOE A. COMPIAN, and LEON)	
PHILLIPS,)	Civil Action

Leon Phillips
March 30, 2023

1) No. 3:22-CV-117
)
 2 Plaintiffs,)
)
 3 vs.)
)
 4 GALVESTON COUNTY, TEXAS,)
 HONORABLE MARK HENRY, in his)
 5 official capacity as Galveston)
 County Judge, and DWIGHT D.)
 6 SULLIVAN, in his official)
 capacity as Galveston County)
 7 Clerk,)
)
 8 Defendants.)

9

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11

ORAL/VIDEOTAPED DEPOSITION OF

12

LEON PHILLIPS

13

MARCH 30, 2023

14

15

16

ORAL/VIDEOTAPED DEPOSITION OF LEON PHILLIPS,

17

produced as a witness at the instance of the

18

Defendants, and duly sworn, was taken in the above-

19

styled and numbered cause on March 30, 2023, from

20

9:00 p.m. to 1:30 p.m., Nilda Codina, Notary in and for

21

the State of Texas, recorded by machine shorthand, from

22

Greer Herz & Adams, L.L.P. 1 Moody Avenue, Galveston,

23

Texas 77550, County of Galveston, pursuant to the

24

Federal Rules of Civil Procedure, and the provisions

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stated on the record or attached hereto.

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A-P-P-E-A-R-A-N-C-E-S

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Fax: (866)422-4352
jraschkeelton@greerherz.com

ALSO PRESENT: Bill Hartley, Videographer
PRESENT REMOTELY: Helen Klein, Esq.; Bruce Geer, Esq.

1 Q. Members who are beyond those boundaries?

2 A. I couldn't tell you for sure.

3 Q. Sure. Okay. You said you are also a member
4 of the Nia Cultural Center; is that correct?

5 A. Correct.

6 Q. And how long have you been a member of that
7 organization?

8 A. Since 1999.

9 Q. Okay. Is that when it was formed --

10 A. No.

11 Q. -- or was it already in place?

12 A. It was in place a little earlier.

13 Q. Okay. And have you ever served as an officer
14 of this organization?

15 A. No, just a board member.

16 Q. Okay. And how long have you served as a
17 board member?

18 A. Since '99.

19 Q. Okay. And what is the -- the mission, the
20 purpose of the Nia Cultural Center?

21 A. It's a boys' and girls' rites of passage
22 organization. We help parents navigate raising kids.
23 Whatever it takes to make a family whole, that's our
24 mission is to help facilitate that.

25 Q. And just like with my prior question with Old

1 Central Carver Park, is there a certain area that this
2 -- the cultural center services?

3 A. No.

4 Q. Who do you typically help?

5 A. No, it's anybody from anywheres.

6 Q. Is it fair to say that typically the people
7 that the Nia Cultural Central helps are from Galveston?

8 A. Correct.

9 Q. Okay. And are there regular meetings for
10 this center?

11 A. Yes, once a month.

12 Q. Okay. Now the Galveston Coalition For
13 Justice, did you found that organization?

14 A. The Galveston Coalition For Justice, yes.

15 Q. Okay. And when was that?

16 A. What year is this?

17 Q. '23.

18 A. Probably in I want to say 2015.

19 Q. Okay. Do you know what the mission statement
20 is for the Galveston Coalition of Justice?

21 A. I couldn't tell you right off the top of my
22 head.

23 Q. How about the -- the purpose, can you
24 describe the purpose of this coalition?

25 A. Basically it's almost the same as the Nia

1 Cultural Center; the only thing we deal with more
2 strategic things. Police department, housing, helping
3 people navigate through the system, things of -- things
4 of that nature.

5 Q. Okay. Would you describe it as a political
6 organization?

7 A. No.

8 Q. Okay. And would you describe the Old Central
9 Carver Park Neighborhood Association or the Nia
10 Cultural Center as political organizations?

11 A. No.

12 Q. Okay. And who else is a member of the
13 Galveston Coalition of Justice?

14 A. I can't give you people's names.

15 Q. How many members do you have?

16 A. I can't give you how many members we have.

17 Q. Okay. Can you give me an estimate, more than
18 --

19 A. No.

20 Q. -- more than ten?

21 A. I can't give you an estimate. At all.

22 Q. More than --

23 A. They don't know whether it's one or it's a
24 thousand, and that's the way I'll leave it.

25 Q. Sure. Now I understand that. Can you tell

1 Chicago did you attend regular meetings?

2 A. No, because I was traveling.

3 Q. Yeah. Do you attend the NAACP Galveston

4 branch meetings regularly now?

5 A. When I can.

6 Q. Okay. Is that once a month as well?

7 A. Yes, they meet once a month.

8 Q. About how often are you able to attend?

9 A. It's according to work.

10 Q. And when you say it's according to work,
11 that's your position as an owner of Fat Cat; is that
12 correct?

13 A. Correct.

14 Q. Okay. About how much time does that take up
15 out of your schedule, the -- your responsibilities for
16 Fat Cat?

17 A. When you say how much time does it take, it's
18 -- it's 24/7, it's a job, you know. You call, need
19 something done, I take care of it.

20 Q. Okay.

21 A. Out of -- out of being in business since 1983
22 that's what I'm pretty good at, resolving problems.

23 Q. Is it fair to say that you use those skills
24 with all of the organizations that you serve?

25 A. Yes.

1 Q. And you use those skills within the community
2 as well, correct?

3 A. Correct.

4 Q. All right. Is it fair to -- to say that you
5 are a community activist?

6 A. I don't like the term activist. I like the
7 term actionist.

8 Q. Okay. Why don't you like the term -- or why
9 do you prefer the term actionist?

10 A. Because I take action at a problem. An
11 activist goes into battle. I'm -- I'm not there to
12 battle anything; I'm there to resolve the problem.

13 Q. You're there looking for solutions, right?

14 A. Correct.

15 Q. Okay. You had mentioned that you've attended
16 LULAC meetings in Galveston. Do you remember -- have
17 you attended any in the last couple of years?

18 A. No.

19 Q. Okay. Do you remember when you've attended
20 or what the -- the circumstances were that you've
21 attended?

22 A. We were on a battle dealing with rebuilding
23 public housing. We -- two individuals here in
24 Galveston, Steve McIntyre and Joe Campion helped us to
25 create a collaborative group, and that consisted of

1 LULAC, NAACP, North Side Task Force, Galveston
2 Coalition For Justice, and Gulf Coast Interfaith; and
3 that is when we attended each other's meetings.

4 Q. Are you a member of Gulf Coast Interfaith?

5 A. No.

6 Q. Okay. And when you worked with -- with LULAC
7 and these other organizations, is it fair to say that
8 there were people of all races and backgrounds who were
9 participating?

10 A. Everybody.

11 Q. Okay. You currently live in Galveston County
12 Commissioner Precinct No. 2; is that correct?

13 A. Steven Holmes' precinct.

14 Q. Okay. So you're currently in -- well, you
15 live on the Island though, correct?

16 A. Correct.

17 Q. Okay. So before the -- the 2021 map for the
18 commissioners was enacted in Galveston County, you were
19 in Steven Holmes's district, correct?

20 A. Correct.

21 Q. Do you know who your current county
22 commissioner is?

23 A. I didn't even know we had had an election.

24 Q. Okay. Just -- do you know Joe Giusti,
25 Commissioner Joe Giusti?

1 A. No.

2 Q. Okay. You've never met him before?

3 A. No.

4 Q. Is it fair to say that Commissioner Holmes
5 was your candidate of choice for commissioner -- county
6 commissioner?

7 A. Yes.

8 Q. Why is that?

9 A. You want people that you -- that represent
10 you for you to be able to have some kind of contact
11 with them, and I've -- I've never seen or interacted
12 with any of the others.

13 Q. Okay. How would you typically see or
14 interact with Commissioner Holmes?

15 A. All over the place.

16 Q. Can you give me some examples?

17 A. We attend things at Saint Vincent's. He does
18 a barbecue every year; we attend that. Pick up
19 telephone and call him every now and then just to see
20 how you doing. He does the same with me, so just like
21 that.

22 Q. Okay. In his role as county commissioner,
23 did you ever reach out to Commissioner Holmes and ask
24 for assistance on a county issue?

25 A. Not so much on a county issue. Well, I guess

1 it was on a county issue. After Ike there's a -- what
2 was a senior citizens' building, and in the next block
3 the county owned a building and it was utilized as --
4 as a place where the housing authority -- I don't know
5 whether the housing authority was renting the building
6 or what, but it was used for senior citizens'
7 activities. Arts and crafts, dance, bingo, and it was
8 right across the street. After Ike the building has
9 never been reopened, and we've been trying to figure
10 out how to strategize to get the building reopened
11 again for seniors.

12 Q. And how -- how has Commissioner Holmes helped
13 with that -- with that project?

14 A. Well, he -- he kind of keeps it on the table
15 at the commissioners' meetings.

16 Q. Anything else?

17 A. No, not that I know of.

18 Q. Have you -- that's incredibly fair. Have you
19 reached out to any of the other commissioners about
20 this project?

21 A. No.

22 Q. Okay. Is it your understanding that that
23 would be Commissioner Holmes's part of the project, is
24 to talk with other --

25 A. Correct, correct.

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

TERRY PETTEWAY, THE
HONORABLE DERRECK ROSE,
MICHAEL MONTEZ, SONNY
JAMES and PENNY POPE,

Plaintiffs,

v.

GALVESTON COUNTY, TEXAS,
and HONORABLE MARK HENRY,
in his official capacity as Galveston
County Judge,

Defendants.

Civil Action No. 3:22-cv-57

UNITED STATES OF AMERICA,

Plaintiff,

v.

GALVESTON COUNTY, TEXAS,
GALVESTON COUNTY
COMMISSIONERS COURT, and
HONORABLE MARK HENRY, in
his official capacity as Galveston
County Judge,

Defendants.

Civil Action No. 3:22-cv-93

DICKINSON BAY AREA BRANCH
NAACP, GALVESTON BRANCH
NAACP, MAINLAND BRANCH
NAACP, GALVESTON LULAC
COUNCIL 151, EDNA COURVILLE,
JOE A. COMPIAN, and LEON
PHILLIPS,

Civil Action No. 3:22-cv-117

Plaintiffs,

v.

GALVESTON COUNTY, TEXAS,
HONORABLE MARK HENRY, in
his official capacity as Galveston
County Judge, and DWIGHT D.
SULLIVAN, in his official capacity as
Galveston County Clerk

Defendants.

§
§
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§

CERTIFICATE OF DEPONENT

May 16, 2023

Leon Phillips
March 30, 2023

127

1 I, LEON PHILLIPS, have read the foregoing
2 deposition and hereby affix my signature that same is
3 true and correct, except as noted above.

Leon Phillips
LEON PHILLIPS

6 STATE OF TEXAS)
7 COUNTY OF Galveston)

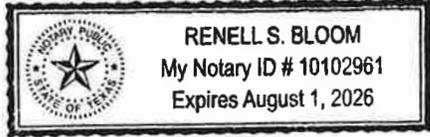
8 Before me, MAY 16th 2023, on this day
9 personally appeared LEON PHILLIPS, known to me (or
10 proved to me under oath through _____) to be the
11 person whose name is subscribed to the foregoing
12 instrument and acknowledged to me that they executed
13 the same for the purposes and consideration therein
14 expressed.

15 GIVEN UNDER MY HAND AND SEAL OF OFFICE, on this,
16 16th day of MAY, 2023.

Renell S. Bloom

Notary Public, State of Texas

19 My Commission Expires: August 1, 2026



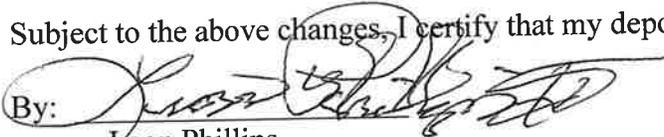
25

DEPOSITION ERRATA SHEET FOR LEON PHILLIPS (MARCH 30, 2023)

Page	Line	Change	Reason
5	9	Fix Ex. 21-A reference to Ex. 11	Transcription Error
5	10	Fix Ex. 27 reference to Ex. 12	Transcription Error
5	11	Fix Ex. 2 reference to Ex. 13	Transcription Error
5	12	Fix Ex. 4 reference to Ex. 14	Transcription Error
5	13	Fix Ex. 12 reference to Ex. 15	Transcription Error
5	14	Fix Ex. 19-B reference to Ex. 16	Transcription Error
11	12	"I can't call names" to "I can't recall names"	Transcription error
12	20	"and" to "And"	Typographical error
13	7	"I couldn't be for sure" to "I couldn't be sure."	Transcription error
22	21	"what are you responsibilities" to "what are your responsibilities"	Transcription error
23	4	"And what's it's -- what's it's mission? What's it's purpose?" to "And what's its -- what's its mission? What's its purpose?"	Typographical error
23	13	"we give them directions on your lights are out" to "we give them directions if your lights are out"	Transcription error
25	5	"from anywheres" to "from anywhere"	Transcription error
31	24	"Joe Campion" to "Joe Compian"	Transcription error
33	18-19	"pick up telephone" to "pick up the telephone"	Transcription error
47	22	"Commissioners court" to "Commissioners Court"	Typographical error
48	9	"commissioners court" to "Commissioners Court"	Typographical error
49	7	"was it part one of the organizations" to "was it part of the organizations"	Transcription error
54	20	"whether Marie Rob won election" to "whether Marie Rob won the election"	Transcription error
62	23	"once that's article's" to "once that article's"	Transcription error
66	14	"you had answer in" to "you had the answer in"	Transcription error
70	14	"would have any reason to" to "what you have any reason to"	Transcription error
79	19	"fools with the statute" to "fools with the statue"	Transcription error
79	24	"take down the statute" to "take down the statue"	Transcription error
95	21-22	Fix Ex. 21-A reference to Ex. 11	Transcription Error

98	12-13	Fix Ex. 27 reference to Ex. 12	Transcription Error
110	14-18	Fix Ex. 2 reference to Ex. 13	Transcription Error
114	6-7	Fix Ex. 4 reference to Ex. 14	Transcription Error
114	23	“Chris Shall Pelley” to “Crishelle Palay”	Transcription Error
116	21-23	Fix Ex. 12 reference to Ex. 15	Transcription Error
118	12-13	Fix Ex. 19-B reference to Ex. 16	Transcription Error

Subject to the above changes, I certify that my deposition transcript is true and accurate.

By: 
Leon Phillips

Dated: 5/16/23

EXHIBIT 26

Expert William Cooper's Magnitude Reports

User:

Plan Name: 2021 Enacted_Plan Galveston

Plan Type: Local

Contiguity Report

Sunday, December 18, 2022

3:11 PM

District	Number of Distinct Areas
1	1
2	1
3	1
4	1

User:

Plan Name: 2021 Enacted_Plan Galveston

Plan Type: Local

Communities of Interest (Condensed)

Sunday, December 18, 2022

3:15 PM

Whole Town/City : 9

Town/City Splits: 17

Zero Population Town/City Splits: 1

District	Town/City	Population	% Pop	District	Town/City	Population	% Pop
1	Bacliff	9,677	100.00%				
1	Clear Lake Shores	1,258	100.00%				
1	Dickinson	4,149	19.90%				
1	Kemah	1,807	100.00%				
1	League City	30,575	27.33%				
1	San Leon	6,135	100.00%				
1	Seabrook	0	0.00%				
1	Texas City	31,421	60.54%				
2	Bayou Vista	1,763	100.00%				
2	Bolivar Peninsula	2,769	100.00%				
2	Galveston	53,695	100.00%				
2	Hitchcock	4,707	64.47%				
2	Jamaica Beach	1,078	100.00%				
2	La Marque	5,864	32.52%				
2	Santa Fe	8,105	63.64%				
2	Texas City	1,906	3.67%				
2	Tiki Island	1,106	100.00%				
3	Dickinson	7,034	33.74%				
3	Friendswood	11,004	36.08%				
3	League City	66,414	59.37%				
4	Dickinson	9,664	46.36%				
4	Friendswood	19,491	63.92%				
4	Hitchcock	2,594	35.53%				
4	La Marque	12,166	67.48%				
4	League City	14,876	13.30%				
4	Santa Fe	4,630	36.36%				
4	Texas City	18,571	35.78%				

User:

Plan Name: 2021 Enacted_Plan Galveston

Plan Type: Local

Political Subdivison Splits Between Districts

Sunday, December 18, 2022

3:13 PM

Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	1	County	0
Voting District	7	Voting District	3

Number of times a subdivision is split into multiple districts:

County	3
Voting District	7

County	Voting District	District	Population
<i>Split Counties:</i>			
Galveston TX		1	87,689
Galveston TX		2	87,697
Galveston TX		3	88,111
Galveston TX		4	87,185
<i>Split VTDs:</i>			
Galveston TX	000227	2	5,227
Galveston TX	000227	4	0
Galveston TX	000258	2	1,387
Galveston TX	000258	4	2,247
Galveston TX	000263	3	10,220
Galveston TX	000263	4	2,311
Galveston TX	000336	1	1,494
Galveston TX	000336	4	4,588
Galveston TX	000341	3	4,544
Galveston TX	000341	4	0
Galveston TX	000471	3	4,599
Galveston TX	000471	4	0
Galveston TX	000490	1	1,618
Galveston TX	000490	3	6,074

COOPER EXHIBIT F-3D

User:

Plan Name: 2021 Enacted_Plan Galveston

Plan Type: Local

Measures of Compactness Report

Sunday, December 18, 2022

3:12 PM

	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
Mean	0.27	0.21	0.65	
Min	0.23	0.12	0.47	
Max	0.30	0.28	0.76	
Std. Dev.	0.04	0.07	0.13	
Sum				395.40

Higher Number is Better

Lower Number is Better

District	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
1	0.30	0.28	0.76	70.74
2	0.24	0.21	0.71	194.27
3	0.23	0.12	0.47	57.27
4	0.29	0.22	0.67	73.12

Measures of Compactness Report

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.
Perimeter	The Perimeter test computes one number for the whole plan. If you are comparing several plans, the plan with the smallest total perimeter is the most compact.

User:

Plan Name: Galveston_Proposed_Plan 1

Plan Type: Local

Contiguity Report

Sunday, December 18, 2022

2:42 PM

District	Number of Distinct Areas
1	1
2	1
3	1
4	1

User:

Plan Name: Galveston_Proposed_Plan 1

Plan Type: Local

Communities of Interest (Condensed)

Sunday, December 18, 2022

2:46 PM

Whole Town/City : 10

Town/City Splits: 19

Zero Population Town/City Splits: 3

District	Town/City	Population	% Pop	District	Town/City	Population	% Pop
1	Bacliff	9,677	100.00%				
1	Clear Lake Shores	1,258	100.00%				
1	Dickinson	3,954	18.97%				
1	Galveston	0	0.00%				
1	Kemah	1,807	100.00%				
1	League City	40,520	36.22%				
1	San Leon	6,135	100.00%				
1	Seabrook	0	0.00%				
1	Texas City	20,940	40.35%				
2	Bayou Vista	1,763	100.00%				
2	Dickinson	4,022	19.29%				
2	Galveston	22,192	41.33%				
2	Hitchcock	4,707	64.47%				
2	Jamaica Beach	1,078	100.00%				
2	La Marque	5,281	29.29%				
2	League City	18,984	16.97%				
2	Santa Fe	12,735	100.00%				
2	Texas City	2,882	5.55%				
2	Tiki Island	1,106	100.00%				
3	Bolivar Peninsula	2,769	100.00%				
3	Dickinson	7,259	34.82%				
3	Galveston	31,503	58.67%				
3	Hitchcock	2,594	35.53%				
3	La Marque	12,749	70.71%				
3	League City	750	0.67%				
3	Texas City	28,076	54.10%				
4	Dickinson	5,612	26.92%				
4	Friendswood	30,495	100.00%				
4	League City	51,611	46.14%				
4	Texas City	0	0.00%				

User:

Plan Name: Galveston_Proposed_Plan 1

Plan Type: Local

Political Subdivison Splits Between Districts

Sunday, December 18, 2022

2:43 PM

Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	1	County	0
Voting District	8	Voting District	5

Number of times a subdivision is split into multiple districts:

County	3
Voting District	8

County	Voting District	District	Population
<i>Split Counties:</i>			
Galveston TX		1	87,659
Galveston TX		2	86,431
Galveston TX		3	88,633
Galveston TX		4	87,959
<i>Split VTDs:</i>			
Galveston TX	000105	1	0
Galveston TX	000105	3	687
Galveston TX	000144	1	3,954
Galveston TX	000144	3	195
Galveston TX	000192	1	701
Galveston TX	000192	3	965
Galveston TX	000225	2	3,715
Galveston TX	000225	3	0
Galveston TX	000263	2	6,597
Galveston TX	000263	4	5,934
Galveston TX	000301	1	0
Galveston TX	000301	3	2,024
Galveston TX	000334	2	0
Galveston TX	000334	3	2,594
Galveston TX	000453	1	0
Galveston TX	000453	4	9,217

COOPER EXHIBIT H-3D

User:

Plan Name: Galveston_Proposed_Plan 1

Plan Type: Local

Measures of Compactness Report

Sunday, December 18, 2022

2:45 PM

	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
Mean	0.33	0.22	0.67	
Min	0.28	0.14	0.56	
Max	0.39	0.30	0.77	
Std. Dev.	0.05	0.09	0.09	
Sum				429.80

Higher Number is Better

Lower Number is Better

District	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
1	0.30	0.29	0.77	69.35
2	0.39	0.30	0.71	112.75
3	0.28	0.15	0.63	184.70
4	0.34	0.14	0.56	63.00

Measures of Compactness Report

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.
Perimeter	The Perimeter test computes one number for the whole plan. If you are comparing several plans, the plan with the smallest total perimeter is the most compact.

User:

Plan Name: Illustrative_Plan_1_Galveston

Plan Type: Local

Contiguity Report

Sunday, December 18, 2022

4:02 PM

District	Number of Distinct Areas
1	1
2	1
3	1
4	1

User:

Plan Name: Illustrative_Plan_1_Galveston

Plan Type: Local

Communities of Interest (Condensed)

Sunday, December 18, 2022

4:03 PM

Whole Town/City : 11

Town/City Splits: 17

Zero Population Town/City Splits: 2

District	Town/City	Population	% Pop	District	Town/City	Population	% Pop
1	Bacliff	9,677	100.00%				
1	Bolivar	2,769	100.00%				
	Peninsula						
1	Clear Lake	1,258	100.00%				
	Shores						
1	Dickinson	4,149	19.90%				
1	Galveston	1,511	2.81%				
1	Kemah	1,807	100.00%				
1	League City	36,422	32.56%				
1	San Leon	6,135	100.00%				
1	Seabrook	0	0.00%				
1	Texas City	20,940	40.35%				
2	Bayou Vista	1,763	100.00%				
2	Dickinson	4,022	19.29%				
2	Galveston	22,192	41.33%				
2	Hitchcock	4,707	64.47%				
2	Jamaica	1,078	100.00%				
	Beach						
2	League City	24,918	22.28%				
2	Santa Fe	12,735	100.00%				
2	Texas City	2,823	5.44%				
2	Tiki Island	1,106	100.00%				
3	Dickinson	6,241	29.94%				
3	Galveston	29,992	55.86%				
3	Hitchcock	2,594	35.53%				
3	La Marque	18,030	100.00%				
3	League City	750	0.67%				
3	Texas City	28,135	54.21%				
4	Dickinson	6,435	30.87%				
4	Friendswood	30,495	100.00%				
4	League City	49,775	44.50%				
4	Texas City	0	0.00%				

User:

Plan Name: Illustrative_Plan_1_Galveston

Plan Type: Local

Political Subdivision Splits Between Districts

Sunday, December 18, 2022

3:48 PM

Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	1	County	0
Voting District	12	Voting District	12

Number of times a subdivision is split into multiple districts:

County	3
Voting District	13

County	Voting District	District	Population
<i>Split Counties:</i>			
Galveston TX		1	87,336
Galveston TX		2	87,025
Galveston TX		3	88,502
Galveston TX		4	87,819
<i>Split VTDs:</i>			
Galveston TX	000225	2	3,715
Galveston TX	000225	3	0
Galveston TX	000276	2	3,095
Galveston TX	000276	3	0
Galveston TX	000311	1	0
Galveston TX	000311	3	4,883
Galveston TX	000334	2	0
Galveston TX	000334	3	2,594
Galveston TX	000338	1	0
Galveston TX	000338	3	9,063
Galveston TX	000399	3	733
Galveston TX	000399	4	0
Galveston TX	000453	1	0
Galveston TX	000453	3	0
Galveston TX	000453	4	9,217
Galveston TX	000454	3	0
Galveston TX	000454	4	7,221
Galveston TX	000482	2	0
Galveston TX	000482	4	407
Galveston TX	000488	2	0
Galveston TX	000488	4	6,205
Galveston TX	000490	1	3,594
Galveston TX	000490	4	4,098
Galveston TX	001051	1	824
Galveston TX	001051	3	0

COOPER EXHIBIT I-3D

User:

Plan Name: Illustrative_Plan_1_Galveston

Plan Type: Local

Measures of Compactness Report

Sunday, December 18, 2022

4:04 PM

	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
Sum	N/A	N/A	N/A	447.94
Min	0.17	0.11	0.51	N/A
Max	0.37	0.29	0.69	N/A
Mean	0.29	0.19	0.61	N/A
Std. Dev.	0.09	0.09	0.09	N/A

District	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
1	0.28	0.24	0.69	147.82
2	0.37	0.29	0.69	113.68
3	0.17	0.11	0.51	116.97
4	0.34	0.12	0.55	69.47

Measures of Compactness Report

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.
Perimeter	The Perimeter test computes one number for the whole plan. If you are comparing several plans, the plan with the smallest total perimeter is the most compact.

User:

Plan Name: Illustrative_Plan_2_Galveston

Plan Type: Local

Contiguity Report

Sunday, December 18, 2022

4:16 PM

District	Number of Distinct Areas
1	1
2	1
3	1
4	1

User:

Plan Name: Illustrative_Plan_2_Galveston

Plan Type: Local

Communities of Interest (Condensed)

Sunday, December 18, 2022

4:12 PM

Whole Town/City : 10

Town/City Splits: 17

Zero Population Town/City Splits: 2

District	Town/City	Population	% Pop	District	Town/City	Population	% Pop
1	Bacliff	9,677	100.00%				
1	Clear Lake Shores	1,258	100.00%				
1	Dickinson	2,927	14.04%				
1	Kemah	1,807	100.00%				
1	League City	41,757	37.33%				
1	San Leon	6,135	100.00%				
1	Seabrook	0	0.00%				
1	Texas City	20,614	39.72%				
2	Bayou Vista	1,763	100.00%				
2	Bolivar Peninsula	2,769	100.00%				
2	Dickinson	9,634	46.21%				
2	Galveston	26,211	48.81%				
2	Hitchcock	4,707	64.47%				
2	Jamaica Beach	1,078	100.00%				
2	La Marque	507	2.81%				
2	League City	12,387	11.07%				
2	Santa Fe	12,735	100.00%				
2	Texas City	2,823	5.44%				
2	Tiki Island	1,106	100.00%				
3	Dickinson	8,286	39.75%				
3	Galveston	27,484	51.19%				
3	Hitchcock	2,594	35.53%				
3	La Marque	17,523	97.19%				
3	League City	750	0.67%				
3	Texas City	28,461	54.84%				
4	Dickinson	0	0.00%				
4	Friendswood	30,495	100.00%				
4	League City	56,971	50.93%				

User:

Plan Name: **Illustrative_Plan_2_Galveston**

Plan Type: **Local**

Political Subdivision Splits Between Districts

Sunday, December 18, 2022

4:18 PM

Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	1	County	0
Voting District	9	Voting District	0

Number of times a subdivision is split into multiple districts:

County	3
Voting District	9

County	Voting District	District	Population
<i>Split Counties:</i>			
Galveston TX		1	87,674
Galveston TX		2	87,402
Galveston TX		3	87,899
Galveston TX		4	87,707
<i>Split VTDs:</i>			
Galveston TX	000144	1	2,927
Galveston TX	000144	3	1,222
Galveston TX	000172	1	743
Galveston TX	000172	3	326
Galveston TX	000192	1	832
Galveston TX	000192	3	834
Galveston TX	000218	2	2,439
Galveston TX	000218	3	2,189
Galveston TX	000306	2	2,479
Galveston TX	000306	3	5,539
Galveston TX	000311	2	11
Galveston TX	000311	3	4,872
Galveston TX	000314	2	797
Galveston TX	000314	3	5,407
Galveston TX	000315	2	1,381
Galveston TX	000315	3	4,470
Galveston TX	000453	1	1,237
Galveston TX	000453	4	7,980

COOPER EXHIBIT J-3D

User:

Plan Name: Illustrative_Plan_2_Galveston

Plan Type: Local

Measures of Compactness Report

Sunday, December 18, 2022

4:17 PM

	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
Mean	0.28	0.18	0.65	
Min	0.20	0.11	0.60	
Max	0.39	0.24	0.74	
Std. Dev.	0.08	0.06	0.06	
Sum				449.87

Higher Number is Better

Lower Number is Better

District	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
1	0.27	0.24	0.74	73.14
2	0.25	0.15	0.64	229.65
3	0.20	0.11	0.60	95.76
4	0.39	0.20	0.62	51.32

Measures of Compactness Report

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.
Perimeter	The Perimeter test computes one number for the whole plan. If you are comparing several plans, the plan with the smallest total perimeter is the most compact.

User:

Plan Name: Illustrative_Plan_3_Galveston

Plan Type: Local

Contiguity Report

Sunday, December 18, 2022

4:20 PM

District	Number of Distinct Areas
1	1
2	1
3	1
4	1

User:

Plan Name: Illustrative_Plan_3_Galveston

Plan Type: Local

Communities of Interest (Condensed)

Wednesday, January 4, 2023

3:21 PM

Whole Town/City : 9

Town/City Splits: 19

Zero Population Town/City Splits: 3

District	Town/City	Population	% Pop	District	Town/City	Population	% Pop
1	Bacliff	5,265	54.41%				
1	Bolivar	2,769	100.00%				
	Peninsula						
1	Dickinson	4,149	19.90%				
1	Galveston	53,695	100.00%				
1	Hitchcock	0	0.00%				
1	Jamaica	1,078	100.00%				
	Beach						
1	League City	5,477	4.90%				
1	San Leon	6,135	100.00%				
1	Texas City	7,841	15.11%				
2	Bayou Vista	1,763	100.00%				
2	Dickinson	1,675	8.03%				
2	Friendswood	18,190	59.65%				
2	Hitchcock	4,707	64.47%				
2	La Marque	507	2.81%				
2	League City	36,585	32.70%				
2	Santa Fe	12,735	100.00%				
2	Tiki Island	1,106	100.00%				
3	Dickinson	15,023	72.06%				
3	Hitchcock	2,594	35.53%				
3	La Marque	17,523	97.19%				
3	League City	4,378	3.91%				
3	Texas City	44,057	84.89%				
4	Bacliff	4,412	45.59%				
4	Clear Lake	1,258	100.00%				
	Shores						
4	Friendswood	12,305	40.35%				
4	Kemah	1,807	100.00%				
4	League City	65,425	58.49%				
4	Seabrook	0	0.00%				
4	Texas City	0	0.00%				

User:

Plan Name: Illustrative_Plan_3_Galveston

Plan Type: Local

Political Subdivision Splits Between Districts

Wednesday, January 4, 2023

3:17 PM

Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	1	County	0
Voting District	5	Voting District	2

Number of times a subdivision is split into multiple districts:

County	3
Voting District	5

County	Voting District	District	Population
<i>Split Counties:</i>			
Galveston TX		1	88,189
Galveston TX		2	89,190
Galveston TX		3	87,208
Galveston TX		4	86,095
<i>Split VTDs:</i>			
Galveston TX	000159	1	5,271
Galveston TX	000159	4	4,412
Galveston TX	000165	1	3,866
Galveston TX	000165	4	5,390
Galveston TX	000225	1	0
Galveston TX	000225	2	3,715
Galveston TX	000330	2	0
Galveston TX	000330	3	5,357
Galveston TX	000490	1	1,618
Galveston TX	000490	4	6,074

COOPER EXHIBIT K-3D

User:

Plan Name: Illustrative_Plan_3_Galveston

Plan Type: Local

Measures of Compactness Report

Wednesday, January 4, 2023

3:24 PM

	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
Mean	0.27	0.20	0.64	
Min	0.21	0.13	0.52	
Max	0.35	0.24	0.74	
Std. Dev.	0.06	0.05	0.10	
Sum				393.22

Higher Number is Better

Lower Number is Better

District	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
1	0.23	0.24	0.68	179.68
2	0.29	0.23	0.74	97.29
3	0.35	0.18	0.60	62.63
4	0.21	0.13	0.52	53.62

Measures of Compactness Report

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.
Perimeter	The Perimeter test computes one number for the whole plan. If you are comparing several plans, the plan with the smallest total perimeter is the most compact.

Cooper Rebuttal Exhibit E-3A

User:

Plan Name: Illustrative_Plan_3A

Plan Type: Local

Contiguity Report

Sunday, March 26, 2023

11:43 AM

District	Number of Distinct Areas
1	1
2	1
3	1
4	1

Cooper Rebuttal Exhibit E-3B

User:

Plan Name: Illustrative_Plan_3A

Plan Type: Local

Communities of Interest (Condensed)

Sunday, March 26, 2023

11:33 AM

Whole Town/City : 9

Town/City Splits: 18

Zero Population Town/City Splits: 3

District	Town/City	Population	% Pop	District	Town/City	Population	% Pop
1	Bacliff	5,265	54.41%				
1	Bolivar	2,769	100.00%				
	Peninsula						
1	Galveston	53,695	100.00%				
1	Hitchcock	0	0.00%				
1	Jamaica	1,078	100.00%				
	Beach						
1	League City	5,477	4.90%				
1	San Leon	6,135	100.00%				
1	Texas City	11,940	23.01%				
2	Bayou Vista	1,763	100.00%				
2	Dickinson	1,675	8.03%				
2	Friendswood	18,190	59.65%				
2	Hitchcock	4,707	64.47%				
2	La Marque	507	2.81%				
2	League City	36,585	32.70%				
2	Santa Fe	12,735	100.00%				
2	Tiki Island	1,106	100.00%				
3	Dickinson	19,172	91.97%				
3	Hitchcock	2,594	35.53%				
3	La Marque	17,523	97.19%				
3	League City	4,378	3.91%				
3	Texas City	39,958	76.99%				
4	Bacliff	4,412	45.59%				
4	Clear Lake	1,258	100.00%				
	Shores						
4	Friendswood	12,305	40.35%				
4	Kemah	1,807	100.00%				
4	League City	65,425	58.49%				
4	Seabrook	0	0.00%				
4	Texas City	0	0.00%				

Cooper Rebuttal Exhibit E-3C

User:

Plan Name: Illustrative_Plan_3A

Plan Type: Local

Political Subdivison Splits Between Districts

Sunday, March 26, 2023

11:47 AM

Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	1	County	0
Voting District	5	Voting District	2

Number of times a subdivision is split into multiple districts:

County	3
Voting District	5

County	Voting District	District	Population
<i>Split Counties:</i>			
Galveston TX		1	88,139
Galveston TX		2	89,190
Galveston TX		3	87,258
Galveston TX		4	86,095
<i>Split VTDs:</i>			
Galveston TX	000159	1	5,271
Galveston TX	000159	4	4,412
Galveston TX	000165	1	3,866
Galveston TX	000165	4	5,390
Galveston TX	000225	1	0
Galveston TX	000225	2	3,715
Galveston TX	000330	2	0
Galveston TX	000330	3	5,357
Galveston TX	000490	1	1,618
Galveston TX	000490	4	6,074

Cooper Rebuttal Exhibit E-3D

User:

Plan Name: Illustrative_Plan_3A

Plan Type: Local

Measures of Compactness Report

Sunday, March 26, 2023

11:54 AM

	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
Sum	N/A	N/A	N/A	393.22
Min	0.21	0.13	0.52	N/A
Max	0.36	0.24	0.74	N/A
Mean	0.27	0.20	0.64	N/A
Std. Dev.	0.07	0.05	0.09	N/A
District	Reock	Polsby-Popper	Area/Convex Hull	Perimeter
1	0.23	0.24	0.68	179.68
2	0.29	0.23	0.74	97.29
3	0.36	0.19	0.62	62.63
4	0.21	0.13	0.52	53.62

Measures of Compactness Report

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.
Perimeter	The Perimeter test computes one number for the whole plan. If you are comparing several plans, the plan with the smallest total perimeter is the most compact.

Cooper Rebuttal Exhibit E-3E

User:

Plan Name: Illustrative_Plan_3A

Plan Type: Local

Travel Contiguity

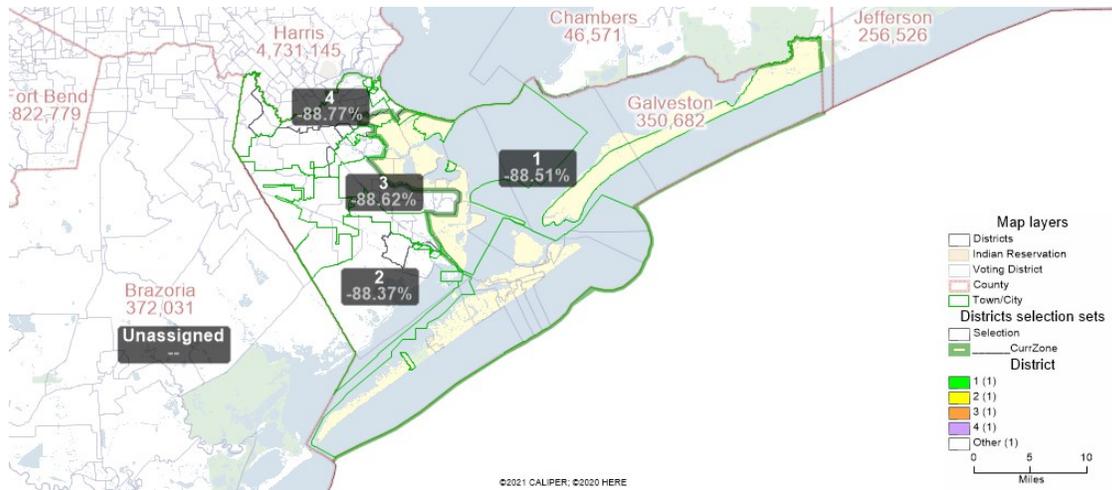
Sunday, March 26, 2023

11:58 AM

Name	Combined %	Drive %	Walk %	Max Drive Distance	Max Drive Time	Max Walk Distance
1		91.7%		66.71	113.87	
2		60.1%		36.84	92.69	
3		92.2%		18.13	34.45	
4		90.0%		19.31	40.96	

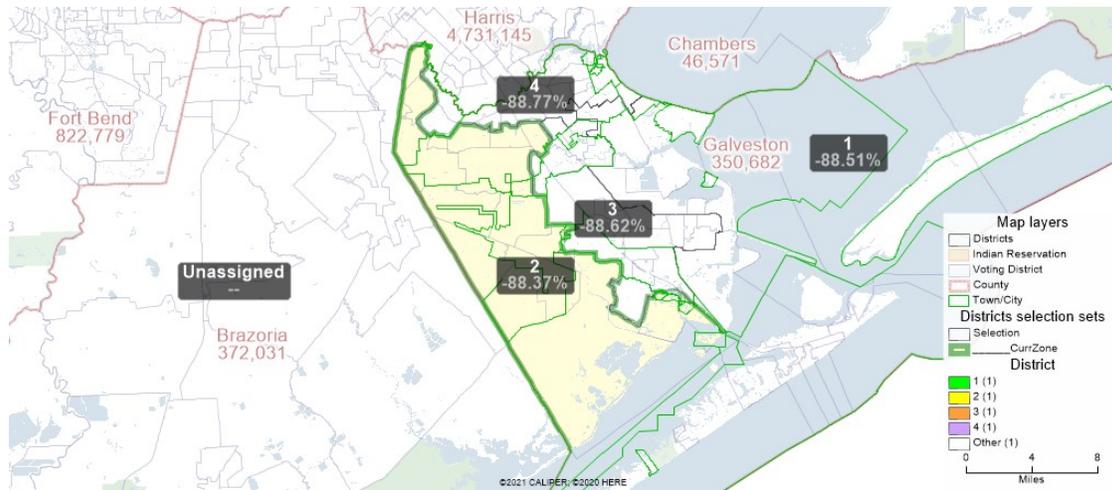
Travel Contiguity

Name	1
Combined %	.0%
Drive %	91.7%
Walk %	.0%
Max Drive Distance	66.71
Max Drive Time	113.87
Max Walk Distance	.00



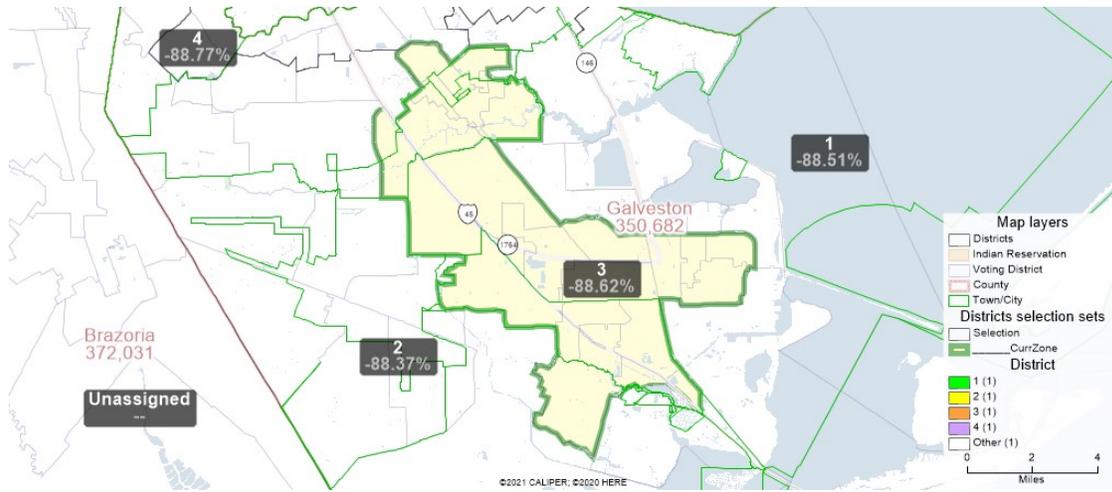
Travel Contiguity

Name	2
Combined %	.0%
Drive %	60.1%
Walk %	.0%
Max Drive Distance	36.84
Max Drive Time	92.69
Max Walk Distance	.00



Travel Contiguity

Name	3
Combined %	.0%
Drive %	92.2%
Walk %	.0%
Max Drive Distance	18.13
Max Drive Time	34.45
Max Walk Distance	.00



Travel Contiguity

Name	4
Combined %	.0%
Drive %	90.0%
Walk %	.0%
Max Drive Distance	19.31
Max Drive Time	40.96
Max Walk Distance	.00

