

IN THE
Supreme Court of the United States

GREG ABBOTT, *et al.*,

Applicants,

v.

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, *et al.*,

Respondents.

ON EMERGENCY APPLICATION FOR STAY TO THE
UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS

**LULAC RESPONDENTS' OPPOSITION TO
EMERGENCY APPLICATION FOR STAY PENDING
RESOLUTION OF DIRECT APPEAL TO THIS COURT**

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TABLE OF CONTENTS

RULE 29.6 DISCLOSURE STATEMENT..... i

TABLE OF CONTENTS..... iii

TABLE OF AUTHORITIES iv

INTRODUCTION1

A. The current redistricting map in Texas is the 2021 congressional map.....1

B. Defendants are not entitled to a stay because they cannot show “a fair prospect that a majority of the Court will conclude that the decision below was erroneous[.]”3

COUNTERSTATEMENT OF THE CASE.....7

 The Legislature Used Racial Targets11

 The Legislature Relied on Racial Stereotypes16

ARGUMENT17

I. Defendants Have Not Demonstrated a fair prospect that a majority of the Court will conclude that the decision below was erroneous18

 1. Texas Purposefully Established 50% Plus Racial Targets for CDs 9, 18, 30 and 35 that Lack Justification18

 2. Plaintiffs’ Direct Evidence of the Predominant Use of Race is More Than Sufficient to Warrant Preliminary Injunctive Relief21

 A. Legislators’ Statements21

 B. Adam Kincaid Cannot Supply the Congressional Map’s Intent22

 1. Adam Kincaid did not work for Texas legislators22

 2. Adam Kincaid’s testimony was post hoc and not credible24

 3. Although Plaintiffs were not Required to Provide an Alternative map to Obtain Preliminary Injunctive Relief, Plaintiffs Demonstrated that the State Could Meet its Partisan Goals with Alternative District Configurations26

II. Defendants have not Demonstrated a Likelihood that Irreparable Harm Will Result From the Denial of a Stay and the Public Interest Weighs in Favor of Plaintiffs.....27

CONCLUSION.....29

TABLE OF AUTHORITIES

Cases

Abbott v. Perez,
585 U.S. 579 (2018).....11

Alexander v. S.C. State Conf. of the NAACP,
602 U.S. 1 (2024).....18, 19, 26

Allen v. Milligan,
143 S. Ct. 1487 (2023).....19

Am. Encore v. Fontes,
152 F.4th 1097 (9th Cir. 2025)28

Anderson v. Bessemer City,
470 U.S. 564 (1985).....20

Bethune-Hill v. Virginia State Bd. of Elections,
580 U.S. 178 (2017).....25

Book People, Inc. v. Wong,
91 F.4th 318 (5th Cir. 2024)27

Bush v. Vera,
517 U.S. 952 (1996).....19

Conkright v. Frommert,
556 U.S. 1401 (2009).....3, 17

Cooper v. Harris,
581 U.S. 285 (2017).....19, 20

Easley v. Cromartie,
532 U.S. 234 (2001).....20

Hunt v. Cromartie,
526 U.S. 541 (1999).....21

Indiana State Police Pension Tr. v. Chrysler LLC,
556 U.S. 960 (2009).....3, 18

Louisiana v. Biden,
55 F.4th 1017 (5th Cir. 2022)27

Miller v. Johnson,
515 U.S. 900 (1995).....19, 20

Nken v. Holder,
556 U.S. 418 (2009).....17, 27

North Carolina v. Covington,
585 U.S. 969 (2018).....19

<i>Petteway v. Galveston County</i> , 111 F.4th 596 (5th Cir. 2024)	4-10, 18, 21
<i>Prejean v. Foster</i> , 227 F.3d 504 (5th Cir. 2000)	21, 23
<i>Purcell v. Gonzalez</i> , 549 U.S. 1 (2006).....	2, 18, 28
<i>Rostker v. Goldberg</i> , 448 U.S. 1306 (1980).....	3
<i>Shaw v. Hunt</i> , 517 U.S. 899 (1996).....	20
<i>Whalen v. Roe</i> , 423 U.S. 1313 (1975).....	17
<i>Williams v. Zbaraz</i> , 442 U.S. 1309 (1979).....	17
<i>Winston–Salem/Forsyth Cnty. Bd. of Educ. v. Scott</i> , 404 U.S. 1221 (1971).....	17
Constitutional Provisions	
U.S. Const. amend. XIV	9
Voting Rights Act	6, 8, 11, 13, 15, 20
Other Authorities	
Gabby Birenbaum, <i>Abbott sets Jan. 31 runoff for special election to replace U.S. Rep. Sylvester Turner</i> , Texas Tribune (Nov. 17, 2025), https://www.texastribune.org/2025/11/ 17/texas-18th-congressional-district-special-election-runoff-date-jan-31-houston/	1
Kayla Guo, <i>Abbott sets Jan. 31 special election runoff for North Texas Senate Seat</i> , Texas Tribune (Nov. 17, 2025), https://www.texastribune.org/2025/11/17/texas- senate-district-9-special-election-runoff-date-jan-31/	3

**TO THE HONORABLE SAMUEL ALITO, ASSOCIATE JUSTICE OF THE
SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE FOR
THE FIFTH CIRCUIT:**

INTRODUCTION

A. The current redistricting map in Texas is the 2021 congressional map. That is the map under which, along with the local voter registration and election day precincts that are based on it, Texas’s 254 counties conducted statewide elections earlier this month.

The 2025 redistricting plan will require local election officials to re-assign 10,448,258 Texans (36% of the State’s population) to new congressional districts. The 2025 map splits 156 cities and towns and 444 election precincts across the state, requiring counties to realign their election precinct boundaries, which are currently based on the 2021 map.

Defendants’ witness from the Texas Secretary of State’s office testified that although county election administrators are “looking at maps,” they are not redrawing local precinct boundaries to conform to the 2025 map. LULAC App. at 155-156. The State’s witness also testified unequivocally that the lines under which Texas voters most recently voted are the lines from the 2021 map, and the effect of an injunction of the 2025 map on Texas voters would be to maintain the same precinct boundaries and district boundaries for Congress under which voters last voted. LULAC App. 158-159.

Harris County, the third largest county in the United States and home to over 2.5 million registered voters, must continue to use the 2021 map through January 31, 2026 for the special election runoff for Congressional District 18.¹ The State’s witness testified that Harris County

¹ Gabby Birenbaum, *Abbott sets Jan. 31 runoff for special election to replace U.S. Rep. Sylvester Turner*, Texas Tribune (Nov. 17, 2025), <https://www.texastribune.org/2025/11/17/texas-18th-congressional-district-special-election-runoff-date-jan-31-houston/>.

“would not be modifying” district boundaries or voter precinct boundaries until after that runoff election has concluded. LULAC App. 157.

Defendants’ argument that a denial of a stay would result in “chaos” (Stay Br. at 2) has it backwards. The district court, after properly concluding that Plaintiffs are entitled to a preliminary injunction, maintained the State’s *current* map under which Texas administered its recent election.² Texas counties, according to the State’s witness, have the 2021 precinct boundaries in their current systems and can “maintain both sets of information” for precinct boundaries (2021 and 2025). LULAC App. 160; *see also* LULAC App. 161-162 (“So there’s -- there are ways to maintain both sets of information.”).

Purcell considerations weigh strongly against a stay. Defendants concede that the 2025 congressional map “changes all but one of Texas’s 38 congressional districts, in many cases changing them dramatically.” Stay Br. at 13. A stay will force over ten million Texans into new congressional districts, and require counties to “dramatically” alter their existing precinct geography and voter registration records. Stay Br. at 13. Preserving the status quo, which is the 2021 map that is in the county election officials’ systems and under which Texas voters cast their ballots earlier this month, prevents “voter confusion and consequent incentive to remain away from the polls.” *Purcell v. Gonzalez*, 549 U.S. 1, 4–5 (2006). In addition, incumbent members of Congress will campaign for re-election in the same districts in which they were elected in 2024. All candidates for Congress will run in the districts they thought they were running in until 13 weeks ago when the Texas Legislature enacted a new map.

² Defendants’ claim that “candidates had already gathered signatures . . . to appear on the ballot under the 2025 map” mischaracterizes the record. Stay Br. at 2, 15. There is no evidence that candidates have gathered signatures under the 2025 map, only that the Texas Secretary of State’s office has received questions regarding the petition process. Stay Br. 2.

Texas Governor Abbott is not concerned about upcoming candidate filing deadlines. *See* LULAC App. 90-91 (“And even if we get to and beyond the filing deadline, we are still going to redraw these maps. Before we’ve done this, what we can do again, and that is have two different elections, one for all the other candidates on the ballot, one for members of Congress. And that’s exactly what we’ll do this time.”). Only last week Governor Abbott announced the special runoff elections for both Harris County and Tarrant County (home to Fort Worth and one of the state’s largest counties) for January 31, 2026.³ The late January runoff elections require both Harris County and Tarrant County to maintain the 2021 election precincts; the Governor’s calling of these elections belies Defendants’ predictions of catastrophe. Stay Br. at 17.

B. Defendants are not entitled to a stay because they cannot show “a fair prospect that a majority of the Court will conclude that the decision below was erroneous[.]” *Rostker v. Goldberg*, 448 U.S. 1306, 1308 (1980); *see also Indiana State Police Pension Tr. v. Chrysler LLC*, 556 U.S. 960, 960 (2009) (citing *Conkright v. Frommert*, 556 U.S. 1401, 1402 (2009)).

The district court properly found, based on abundant direct evidence, that the Texas Legislature racially gerrymandered the 2025 congressional map. First, the Legislature targeted and revised multi-racial districts because of their racial composition and in response to a demand by the U.S. Department of Justice (“DOJ”) that Texas “rectify” “unconstitutional ‘coalition districts’[.]” Second, the Legislature purposefully sorted a significant number of voters, on the basis of race, into districts to meet 50% plus citizen voting age population (“CVAP”) racial targets. Third, the Legislature made use of racial stereotypes by creating districts that legislators claimed would fulfill the political desires of Hispanic voters, but without any information about how the Hispanic voters in those districts vote.

³ *See* Kayla Guo, *Abbott sets Jan. 31 special election runoff for North Texas Senate Seat*, Texas Tribune (Nov. 17, 2025), <https://www.texastribune.org/2025/11/17/texas-senate-district-9-special-election-runoff-date-jan-31/>.

The now-infamous DOJ letter, sent on July 7, 2025 by the head of the Civil Rights Division to the Governor and Attorney General of Texas, kicked off Texas re-redistricting.⁴ The letter stated that “[i]t is the position of this Department that several Texas Congressional Districts constitute unconstitutional racial gerrymanders, under the logic and reasoning of *Petteway* [*v. Galveston County*, 111 F.4th 596 (5th Cir. 2024) (en banc)].” LULAC App. 2. The letter explained that “Congressional Districts TX-09, TX-18, TX-29 and TX-33 currently constitute unconstitutional ‘coalition districts’” and threatened that DOJ would sue “[i]f the State of Texas fails to rectify the racial gerrymandering of TX-09, TX-18, TX-29 and TX 33[.]” LULAC App. at 1-2.

Two days later, Governor Abbott directed the Texas Legislature to consider, in a special session, “[l]egislation that provides a revised congressional redistricting plan *in light of constitutional concerns raised by the U.S. Department of Justice*.” LULAC App. 5 (emphasis added). Governor Abbott steadfastly denied that his call to redistrict was motivated by President Trump’s pressure to create more Republican districts, and asserted instead that Texas “wanted to remove those coalition districts” from the congressional map and was spurred to action by “a federal court decision that came out last year.” LULAC App. 105-107.

Lawmakers, including the redistricting plan bill author, declared that coalition districts must be redrawn because “minority vote dilution coalitions are impermissible.” LULAC App. at 17. Legislators then changed the boundaries of districts specifically to alter their racial composition. App. 35-50 Mem. Op. & Order (describing the reconfiguration of multi-racial Congressional Districts (“CD”) 9, 18, 22, 27, 30, 32, and 35 to single-race majority districts). The Speaker of the Texas House marked passage of the map in that chamber by announcing that

⁴ See LULAC App. 83 (Harmeet Dhillon’s statement that the DOJ Letter “is what triggered the Texas legislature and the Texas governor to call the legislature into session to put new maps together”).

the House had just “delivered legislation to redistrict certain congressional districts *to address concerns raised by the Department of Justice* and ensure fairness and accuracy in Texans’ representation in Congress.” LULAC App. 12 (emphasis added).

The Legislature employed purposeful racial targets for the “new” districts that it created in the redistricting plan. CD 9, for instance, was previously a multi-racial district with approximately 25.6% Hispanic CVAP and 45.0% Black CVAP. LULAC App, at 92. The new map redrew the district to have a Hispanic-majority CVAP of 50.3%. LULAC App. 94. Similarly, the new map increased CD 18’s Black CVAP from 38.8% to 50.5%. LULAC App. 92; LULAC App. 94. The map increased CD 30’s Black CVAP from 46.0% to 50.2%, and increased CD 35’s Hispanic CVAP from 46.0% to 51.6%. LULAC App. 92-93; LULAC App. 94-95.

The redistricting bill’s author, Representative Todd Hunter, confirmed that the map purposefully created districts with single-race CVAP over 50%. LULAC App. 40-41.(REP. TURNER: [So] with CD 9 is to -- just to close the loop on that. It was also purposely changed so that the Hispanic CVAP would be over 50 percent now. REP. HUNTER: 50.41 percent. Correct.).

During his bill layout for the new congressional map, Rep. Hunter explained that the new map’s CD 9 was above 50% Hispanic CVAP “because of *Petteway*.” LULAC App. 39. During the floor debate, Representative David Spiller, a member of the House Redistricting Committee and a joint author of the bill, referred to CD 9 as “a coalition district and the district that was addressed in the *Petteway* case” and asked Rep. Hunter to confirm that “now, under your HB 4, it changed from a coalition district to a majority Hispanic CVAP district. Is that correct?” Rep. Hunter agreed. *See* LULAC App. 57.

Rep. Hunter described the increase of Black CVAP in CD 18 from 38.8% to 50.8% as “much more improving” and emphasized that under his map “you have two that are majority Black CVAP districts in Texas.” LULAC App. 61-62.

Representative Spiller questioned Rep. Hunter in committee “about District 18 in Harris County, what is referred to as the Barbara Jordan district.” Rep. Hunter responded “under this plan, that *it becomes a real performing Black CVAP district.*” LULAC App. 18 (emphasis added). They continued their exchange:

REP. SPILLER: Right. And I would submit to you that it is currently a coalition district; under HB 4, it would not be. Coalition districts are the type that are addressed in the Petteway case; and so I would submit to you that it goes from a coalition district to a majority Black CVAP district, being 58.1 percent Black.

REP. HUNTER: That is correct.

LULAC App. 18-19.

Representatives Hunter and Katrina Pierson, a fellow member of the House Select Committee on Congressional Redistricting and bill co-author, discussed in committee that CD 35 “is one of the coalition districts that is one of the new majority Hispanic CVAP districts[.]” LULAC App. 25.

Legislators offered no information or analysis to support the use of 50% CVAP racial targets to comply with the Voting Rights Act or any other legal requirement:

REP. TURNER: Is there any evidence or data you have that would suggest that Black voters in CD 18 or CD 30 are unable to elect the candidate of their choice --

REP. HUNTER: I -- I don't have any evidence.

REP. TURNER: -- in current configuration?

REP. HUNTER: I don't have -- you said, “do I have evidence?” I don't. I don't have any evidence.

LULAC App. 41-42; *see also id.* (Rep. Hunter stating “I don’t have any data or any evidence” showing that Latino voters in the current CD 35 are unable to elect the candidates of their choice.)

Instead, legislators claimed broadly that the “new” Hispanic majority districts increased minority representation because Hispanic voters prefer Republicans. LULAC App. 34-35. (REP. PIERSON: President Trump did win the majority of the Hispanic votes in the state; in fact, he flipped, I believe it was, ten counties in the state. So don’t you think that is reflective of this map, this proposed map, that the minorities who are here with the new majority minority districts that have been created, it is reflective?)

Rep. Hunter also referred to the four “new” Hispanic majority districts in his bill as “trend[ing] Republican in political performance” and “Hispanic performing” without explaining whether the Hispanic CVAP majorities in the new districts would be able to elect their preferred candidates. LULAC App. 14, 59-60.

In addition to Defendants’ inability to show “a fair prospect that a majority of the Court will conclude that the decision below was erroneous[,]” Plaintiffs and the public interest will suffer if the preliminary injunction is stayed. This harm far outweighs any interest of state officials, whose only purported injury will be to employ a congressional redistricting plan they have been using for the past four years instead of a plan that did not exist 13 weeks ago.

COUNTERSTATEMENT OF THE CASE

Talk of re-drawing the Texas congressional map started in the Texas Legislature in early spring of 2025, specifically as a response to *Petteway*, according to Representative Tom Oliverson, a member of the Texas House redistricting committee and Chair of the Texas House

Republican Caucus. LULAC App. 85-86 (“[T]he first conversations that I heard about and had myself regarding redistricting began before the legislative session began in January as a result of a court case where a federal appeals court basically rejected the idea of the coalition districts as being consistent with the Voting Rights Act.”). In March, 2025, a Texas member of the Republican National Committee contacted Adam Kincaid and told him that *Petteway* gave Texas the opportunity to redraw its congressional map. LULAC App. 123-125. According to Kincaid, “he referred to [*Petteway*] as a big win, and it gave them the opportunity to redraw.” LULAC App. 125.

Representative Hunter, the author of the 2025 redistricting bill, explained during the legislative debates that “it had been discussed since April that congressional redistricting could be an issue, especially with the new case law and the new population trends, and I made the decision that I would file this Bill.” LULAC App. 52.

Several weeks after President Trump began calling publicly for Texas to redraw its congressional map, Texas Governor Greg Abbott announced his intent to call a special legislative session. However, the Governor did not put redistricting on the special session agenda. LULAC App. 10-11. Instead, Governor Abbott spoke by phone with DOJ officials about a letter that DOJ could send to Texas about redistricting. App. 98 (citing ECF No. 1342, at 51–52, 54–55).

A week later, DOJ sent its letter. Citing *Petteway v. Galveston County*, 111 F.4th 596 (5th Cir. 2024) (en banc), the letter claimed that four Texas congressional districts were “unconstitutional” because they were majority-non-White districts in which no single racial group constituted a 50% majority. *See generally* LULAC App. 1-2; *see also id.* (“It is well-established that so-called ‘coalition districts’ run afoul the [sic] Voting Rights Act and the

Fourteenth Amendment It is the position of this Department that several Texas Congressional Districts constitute unconstitutional racial gerrymanders, under the logic and reasoning of *Petteway*.”). Although the letter purported to identify four “unconstitutional ‘coalition districts’” one of those four districts (CD 29) is in fact a majority Hispanic CVAP district. *See* App. 12 (citing ECF No. 1326-5, at 1 (“By CVAP, the 2021 configuration of CD 29 was 63.5% Hispanic”)).

The DOJ letter threatened to sue if Texas did not “rectify these race-based considerations from these specific districts.” LULAC App. 1-2. The letter made no mention of partisanship or Democratic congressional districts in Texas that are majority White. *Id.* *See generally* LULAC App. 1-2.

Two days after receiving the DOJ letter, Governor Abbott, the only official who can call the Texas Legislature into a special session, and the only official who can add items to the special session agenda, directed the Legislature to redraw the congressional map “in light of constitutional concerns raised by the U.S. Department of Justice.” LULAC App. 3-5; *see also* LULAC App. 90 (“What I do have control over, Jake, is what we’re dealing with right now. And that is I called a special session. I put items on the agenda.”).

Governor Abbott stated publicly that he called the Legislature into a special session to redistrict because of *Petteway* and to remove coalition districts from the map. LULAC App. 88 (stating that “one thing that spurred all of this is a federal court decision that came out last year . . . [that] said that Texas is no longer required to have coalition districts” and that Texas “wanted to remove those coalition districts[.]”).

Indeed, when asked whether his redistricting push was in response to President Trump’s desire to create additional Republican districts, the Governor rejected the idea. LULAC App. 89 (TAPPER: “[Y]ou’re doing this to give Trump and the Republicans in the House of Representatives five additional seats, right? I mean, that’s the motivation is to stave off any midterm election losses.” ABBOTT: “Again, to be clear, Jake, the reason why we’re doing this *is because of that court decision.*”) (emphasis added).⁵

In the Texas Legislature, the 2025 redistricting plan’s bill author, Rep. Hunter, took up the Governor’s baton.

During his bill layout of the new congressional plan, Rep. Hunter agreed that the new map “is in compliance with the Petteway case[.]” LULAC App. 22-23. Rep. Hunter also stated on the House floor that *Petteway* was a reason for the redistricting:

REP. SPILLER: Okay. So, now, in Texas, one of the reasons that we’re doing this now is that, we feel compelled to because of the Petteway case and the ruling in the Petteway case as it related -- as it relates to these coalition districts, correct?

REP. HUNTER: Well, I think it’s a combination, Mr. Spiller. I think you have a U.S. Supreme Court, *Rucho*. You have a 5th Circuit, *Petteway*. The combination of both of those cases are involved in this map.

LULAC App. 56.

The Legislature’s new redistricting plan followed the DOJ’s letter’s instruction to “rectify” coalition districts by reducing their number throughout the state. In Houston, the new redistricting plan collapsed two congressional districts (CDs 9 and 18) that had previously elected Black members of Congress into each other, leaving one district, CD 18, with a Black

⁵ Although Defendants now criticize the DOJ letter, *see, e.g.*, Stay Br. at 3, whether or not the letter was legally correct is irrelevant. The letter called for Texas to “rectify” and “correct[.]” districts because of their racial composition and the Governor and the Legislature responded by redrawing the congressional map as directed. *See* LULAC App. 1-2.

CVAP majority. Also in Houston was Hispanic-majority CD 29, which the DOJ letter had confusingly characterized as an unconstitutional coalition district. In response, the new map “rectif[ied] these race-based considerations” by dismantling CD 9’s Hispanic majority and reducing the Hispanic CVAP from 63.5% to 43.3%. *Compare* LULAC App. 92 (CD 29’s CVAP statistics under the 2021 Map), *with* LULAC App. 94 (CD 29’s CVAP statistics under the 2025 Map).

In Central Texas, the new map dismantled CD 35, a district which, in 2018, this Court held that Texas “had ‘good reasons’ to believe . . . was a viable Latino opportunity district that satisfied the *Gingles* factors” under Section 2 of the Voting Rights Act. *See Abbott v. Perez*, 585 U.S. 579, 616 (2018). In Dallas, the new map increased the Black CVAP of CD 30 to just over 50% by pulling in Black population from the adjacent multi-racial CD 33.

The Legislature Used Racial Targets

Legislators created districts with single-race bare CVAP majorities:

- (1) CD 9 (Hispanic CVAP 50.3%);
- (2) CD 18 (Black CVAP 50.5%);
- (3) CD 30 (Black CVAP 50.2%).
- (4) CD 35 (Hispanic CVAP 51.6%).

App. at 49, 97.

In addition to confirming that CD 9 was purposefully changed to be just over 50% Hispanic CVAP (LULAC App. 40-41), Rep. Hunter also stated that increasing the Black CVAP above 50% was a purpose in the drawing of CD 18:

REP. TURNER: All right. So, for example, CD 18 was purposely altered so to be a Black CVAP majority district rather than a 38.8 percent Black CVAP district, right?

REP. HUNTER: CD 18 was drawn to be a 50.81 percent CVAP, which is 11.82 change plus.

REP. TURNER: Okay. So, that was -- that was the purpose of that change?

REP. HUNTER: I don't know if that's the only purpose, but that's the effect.

LULAC App. 37.

Rep. Hunter similarly explained that increasing the Hispanic CVAP of CD 35 above 50% was one of the purposes of drawing that district:

REP. TURNER: Okay. And -- and similarly, the proposed CD 35 was purposely changed to increase its Hispanic CVAP to be above 50 percent, correct? Yeah. I think that's one of the ones you alluded to.

REP. HUNTER: 51.57 percent.

REP. TURNER: Uh-huh.

REP. HUNTER: And it *also* has political performance involved --

REP. TURNER: Right.

REP. HUNTER: -- in all of this.

LULAC App. 37-38 (emphasis added); *see also id.* (Rep. Hunter responded to a question about the purposeful increase of Black CVAP of CD 30 above 50% by describing the increase from 46% to 50.41%).

The increased Hispanic CVAP majorities in CD 9 and CD 35 were particularly important to Rep. Hunter as he discussed the five additional Republican-leaning districts in the plan:

The five new districts we have, CD 9, 50.15 percent what we call Hispanic citizen voting age population. That's HCVAP. . . CD 35, 51.57 percent, HCVAP. . . In the proposed plan, there are two majority Black CVAP districts. CD 18, 50.71 percent, Black CVAP, compared to 38.99 percent in 2021. CD 30, 50.41 percent, Black CVAP. 46 percent in 2021.

LULAC App. 50.

Rep. Hunter repeatedly reviewed the Hispanic CVAP of the four new Republican-leaning districts in committee and on the House floor:

So there are five new districts: 9, which is Houston area; 28, which is the Valley, South, Rio Grande Valley; 32, Dallas area; 34, Coastal and South; and 35, San Antonio area. Congressional District 9, the new district, has a 50.5-percent Hispanic CVAP. CD 28 -- that's the Valley South -- has an 86.70-percent Hispanic CVAP. CD 32 is a -- and remains a non-minority direct; CD 34, 71.9 percent, is now a Hispanic CVAP. And CD 35, which is San Antonio, is now a 51.6-percent Hispanic CVAP.

LULAC App. 15-16; *see id.* at 16 (“In the 2021 plan, there were 7 Hispanic citizen voting age districts; and under this plan, there are 8.”).

Rep. Hunter described new district demographics in the same breath as partisan performance, weaving the two together:

The primary changes, though, are focused on five districts for partisan purposes. *It is important to note that four of the five new districts are majority minority Hispanic CVAP districts, Citizen Voting Age Population, four of the five new districts.* Each of these newly-drawn districts now trend Republican in political performance.

LULAC App. 14 (emphasis added).

In response to one question about whether the federal Voting Rights Act requires the creation of any Latino majority congressional district in Texas, Rep. Hunter responded by referring to the map's new Republican districts and said “[f]our of the five are Hispanic majority.” LULAC App. 55. Rep. Hunter also engaged in a colloquy with Rep. Pierson about increasing the Hispanic CVAP in CDs 9 and 35 above 50%: “REP. PIERSON: Okay. The plan also creates two new Hispanic CVAP districts, that would be District 9 and 35. Is that correct? REP. HUNTER: Those are HCVAPs. Yes --[.]” LULAC App. 36.

Rep. Hunter also reviewed with Rep. Pierson the map's increase of Black CVAP in CD 18 and CD30 above 50%:

REP. PIERSON: Yes. Well, this current map that you have submitted actually shows where there's not just one but two majority Black CVAP districts drawn on this map; is that true?

REP. HUNTER: That is correct. And let me give everybody details. CD 18 is now 50.8 percent Black CVAP; in 2021 it was only 38.8 percent. CD 30 is now 50.2 percent Black CVAP; in 2021 it was 46 percent.

LULAC App. 169.

After pointing out that the new map would take the number of Black majority districts from zero to two, Rep. Pierson concluded: "So it would be fair to say that your proposed map . . . would, in fact, strengthen minority representation in our state. Would you agree?" Rep. Hunter responded: "So I do want everybody to know: 'Yes,' we have done those things; and we've done the partisanship." LULAC App. 169-170.

Rep. Hunter compared the new congressional districts to the existing 2021 plan to highlight the increase in single-race majority districts:

Now, let me give you some information, data points, in comparison to the 2021 plan. . . In the 2021 plan, there were 7 Hispanic citizen voting age districts; and under this plan, there are 8. There were no majority Black CVAP, Citizen Voting Age Population, districts under the 2021 plan. In the proposed plan today, there are 2 majority CVAP districts. CD 18 is now 50.8 percent Black CVAP; in 2021 it was 38.8. CD 30 is now 50.2 percent Black CVAP; in 2021 it was 46 percent.

LULAC App. 16.

The Legislature maintained the 50% single-race majorities in the map after making significant revisions to the Harris County area districts on August 18, 2025. *Compare* LULAC App. 96-98 *with* LULAC App. 99-101 (Showing that the Hispanic CVAP of CD9 changed from 50.5% to 50.3%, and the Black CVAP of CD18 changed from 50.8% to 50.5%). Despite changes that the State's expert characterized as a "complex chain of events involving almost

700,000 residents in 12 districts, 667,000 of whom lived in the Houston area[,]” the Hispanic CVAP of CD 9 changed by only 0.2 percentage points. LULAC App. 164-165.

Despite their heavy focus on the creation of new districts with majority Black or Hispanic CVAP, legislators never offered a legal justification, under the Voting Rights Act or otherwise, for increasing the CVAP in those districts.

Rep. Hunter admitted he had no evidence that Latino voters in CD 35, or Black voters in CD 18 and CD 30, were unable to elect the candidate of their choice in the 2021 versions of those districts. LULAC App. 40-43.

Rep. Hunter also said he did not conduct a racial polarization analysis and he did not ask his law firm to conduct such an analysis. *See* LULAC App. 52-53 (Hunter: “Well, I don’t know what you mean by ‘racial polarization analysis.’ I know about data that was done by HCVAP, HVAP, Black CVAP, Black VAP which is a little bit different. That’s what I’m relying on.”); *see also* LULAC App. 43-44 (REP. TURNER: “Yeah. Has -- has Butler Snow conducted a racially polarized voting analysis within the new CD 9 to ascertain who the candidates of choice are between Hispanic voter -- with Hispanic voters and also with Anglo voters?” REP. HUNTER: “I don’t know” REP. TURNER: “You haven’t asked them to?” REP. HUNTER: “No. I haven’t asked anybody on that.”).

In the Texas Senate, the bill sponsor stated that he was unaware of whether anyone had performed a racial polarization (“RPV”) analysis of the new map. *See* LULAC App. 66, 69 (SENATOR ZAFFIRINI: “No. Have the map drawers or anyone else including your legal counsel done an RPV analysis of the mapping proposal?” SENATOR KING: “I don’t have any personal knowledge of that.”).

The Legislature Relied on Racial Stereotypes

Governor Abbott spoke of a second reason to re-draw the congressional map, in addition to “rectify[ing]” districts that contained multi-racial majorities. He said he wanted the new redistricting plan to create Hispanic majority districts that would elect Republicans. *See* LULAC App. 89 (“One thing that’s happened in the state of Texas is the Hispanic community, a lot of it, have [sic] decided they are no longer with the Democrats . . . And they instead align with Republicans. What we want to do is to draw districts that give those Hispanics and African Americans in the state of Texas the ability to elect their candidate of choice.”).

Although legislators claimed that the creation of Republican-leaning districts in Houston and San Antonio would expand Hispanic electoral opportunity, they relied on broad generalizations that Latinos preferred Republican candidates, and did not examine the candidate preferences of the specific Hispanic populations they placed into the “new” CD 35 and CD 9.

Rep. Hunter relied on the Hispanic CVAP majorities in the new Republican districts to argue the map expanded Hispanic electoral opportunity. LULAC App. 55 (REP. GARVIN HAWKINS: “So, you don’t believe, or do you believe, that this redistricting plan eliminates any minority opportunity districts? Does this plan do that?” REP. HUNTER: “No. I think we created four out of five new seats of Hispanic majority. I would say that’s great.”).

On the House floor, Rep. Hunter shared his belief that Hispanic “performance and trend is going that direction, to support Republicans. Absolutely.” LULAC App. 52-53.

Rep. Pierson, when explaining her vote in support of the new map, explained that the new map would increase minority representation. *See* LULAC App. 64 (“Increasing minority

representation is the right thing to do, and it more accurately reflects the values of Texans. This is long overdue, and we owe it to the people of Texas. Thank you, Mr. Speaker.”).

Nevertheless, legislators conducted no analysis of Hispanic voter preferences in CDs 9 and 35, in a racially polarized voting study or otherwise, and thus had only assumption, not information, to support their claim that creating these new districts would “give those Hispanics and African Americans in the state of Texas the ability to elect their candidate of choice.” LULAC App. 89. *See also* LULAC App. 40-42.

ARGUMENT

A stay pending appeal is “extraordinary relief,” and requires the stay applicant to satisfy a “heavy burden.” *Winston–Salem/Forsyth Cnty. Bd. of Educ. v. Scott*, 404 U.S. 1221, 1231 (1971) (Burger, C.J., in chambers). “[T]he applicant must meet a heavy burden of showing not only that the judgment of the lower court was erroneous on the merits, but also that the applicant will suffer irreparable injury if the judgment is not stayed pending his appeal.” *Williams v. Zbaraz*, 442 U.S. 1309, 1311 (1979) (quoting *Whalen v. Roe*, 423 U.S. 1313, 1316 (1975) (Marshall, J., in chambers)).

To obtain a stay pending appeal, an applicant must demonstrate: “(1) a reasonable probability that four Justices will consider the issue sufficiently meritorious to grant certiorari or to note probable jurisdiction; (2) a fair prospect that a majority of the Court will conclude that the decision below was erroneous; and (3) a likelihood that irreparable harm will result from the denial of a stay.” *Conkright v. Frommert*, 556 U.S. at 1402 (GINSBURG, J., in chambers) (cleaned up). “A stay is not a matter of right, even if irreparable injury might otherwise result.” *Nken v. Holder*, 556 U.S. 418, 433 (2009) (internal quotation marks omitted). “It is instead an

exercise of judicial discretion, and the ‘party requesting a stay bears the burden of showing that the circumstances justify an exercise of that discretion.’” *Indiana State Police Pension Tr. v. Chrysler LLC*, 556 U.S. at 961.

Defendants have not met their heavy burden; they cannot show a fair prospect that they are likely to prevail on the merits, and their application should be denied for this reason alone. Additionally, the factors under *Purcell* weigh heavily in favor of Plaintiffs. Furthermore, Plaintiffs and the public interest will suffer if the preliminary injunction is stayed and they are compelled to cast ballots under a last-minute, racially gerrymandered redistricting plan.

I. Defendants Have Not Demonstrated a fair prospect that a majority of the Court will conclude that the decision below was erroneous

Defendants do not seriously engage with the facts of the case or with the district court’s careful weighing of the evidence and witness credibility determinations. Instead, Defendants ask the Court to turn a blind eye to the frank statements of Texas legislators that reveal legislative intent, and focus instead on the testimony of a map-drawer whom legislators refused to acknowledge and whom the district court found not credible. Defendants further urge the Court to apply the good faith presumption afforded to legislatures under *Alexander v. S.C. State Conf. of the NAACP*, 602 U.S. 1 (2024) to cancel out even direct evidence of the predominant use of race, despite *Alexander*’s recognition that direct evidence can overcome the presumption.

1. Texas purposefully established 50% plus racial targets for CDs 9, 18, 30 and 35 that lack justification

In response to the DOJ letter, Texas legislators repeatedly stated that they had to respond to DOJ’s constitutional concerns and “compl[y]” with *Petteway*. LULAC App. 22-23.

Legislators did this by using race for its own sake and creating single-race majority districts.

Rep. Hunter, the redistricting bill author, conceded that the new majority districts were purposefully created to exceed 50% Black or Hispanic CVAP. *See e.g.* LULAC App. 40-41 (“REP. TURNER: [So] with CD 9 is to -- just to close the loop on that. It was also purposely changed so that the Hispanic CVAP would be over 50 percent now. REP. HUNTER: 50.41 percent. Correct.”). *See Bush v. Vera*, 517 U.S. 952, 1000 (1996) (THOMAS, J., concurring in judgment) (a State’s “concession that it intentionally created majority-minority districts [i]s sufficient to show that race was a predominant, motivating factor in its redistricting”).

The legislators’ statements provide conclusive “[d]irect evidence . . . in the form of a relevant state actor’s express acknowledgment that race played a role in the drawing of district lines.” *Alexander* 602 U.S. at 8; *see also North Carolina v. Covington*, 585 U.S. 969, 977 (2018) (“a plaintiff can rely upon either ‘circumstantial evidence of a district’s shape and demographics or more direct evidence going to legislative purpose’ in proving a racial gerrymandering claim.”) (quoting *Miller v. Johnson*, 515 U.S. 900, 916 (1995)).

Defendants’ explanation for the new single-race majorities in CDs 9, 18, 30 and 35 is that they are coincidental. The district court properly rejected this contention as not credible. App. 98 (“Mr. Kincaid would also have us believe that it’s just a coincidence that the 2025 Map achieves three of the four explicit racial directives outlined in the DOJ Letter[.]”).

The district court’s conclusion that race predominated in drawing these new single-race majority districts “warrants significant deference[.]” *Cooper v. Harris*, 581 U.S. 285, 293 (2017); *see also id.* (“[T]he court’s findings of fact—most notably, as to whether racial considerations predominated in drawing district lines—are subject to review only for clear error.”); *see also Allen v. Milligan*, 143 S. Ct. 1487, 1506 (2023). This Court affirms if the racial-predominance

finding “is plausible in light of the full record,” and even if it would have decided differently ab initio. *Cooper*, 581 U.S. at 293 (quoting *Anderson v. Bessemer City*, 470 U.S. 564, 573-74 (1985)).

“[A] State may draw distinctions among its citizens based on race only when it “is pursuing a compelling state interest” and has chosen “narrowly tailored” means to accomplish that interest. *Shaw v. Hunt*, 517 U.S. 899, 908 (1996) (internal quotation marks omitted). The new Black and Hispanic majority districts in the 2025 congressional map cannot survive strict scrutiny because legislators offered no information or analysis, under the Voting Rights Act or otherwise, to demonstrate a compelling state interest.

Even if done for partisan ends, using race as the predominant means to sort voters is unconstitutional. *Cooper*, 581 U.S. at 308 n.7. And even if the Texas Legislature sought to create single-race majority districts as a selling point for the redistricting plan, or to ward off allegations of race discrimination, “their action still triggers strict scrutiny.” *Cooper*, 581 U.S. at 308 n.7; *see also Shaw*, 517 U.S. at 907 (“partisan politicking” can be “actively at work in the districting process” while “race [remains] the legislature’s predominant consideration”); *Easley v. Cromartie*, 532 U.S. 234, 266 (2001) (Thomas, J., dissenting) (“[T]he District Court was assigned the task of determining whether, not why, race predominated.”); *Miller*, 515 U.S. at 914.

Similarly, although legislators praised the creation of Republican-leaning districts with Hispanic CVAP majorities as consistent with the idea that Hispanic voters support President Trump, the legislators’ race-based assumptions are insufficient when they did not analyze the voting preferences of the Latinos moved into those new districts. *See Miller*, 515 U.S. at 914.

(the “use of race as a proxy” for “political interest[s]” is “prohibit[ed]”).

2. Plaintiffs’ Direct Evidence of the Predominant Use of Race is More Than Sufficient to Warrant Preliminary Injunctive Relief.

A. Legislators’ Statements

Defendants do not dispute that Texas legislators and other state officials made their statements about the DOJ letter, *Petteway*, and the creation of single-race majority districts. Instead, Texas urges the Court to rely instead on explanations by legislators who were peripheral to the mapping process and testimony by the 2025 map-drawer. *See* Stay Br. at 5-7, 9 (citing hearing testimony from Senator King, Representative Vasut, and Mr. Kincaid).

The district court properly gave this evidence less weight because it was inconsistent, after-the-fact or both. *See, e.g.*, App. 87, 90, 96 (not crediting the testimony of Sen. King in part because of “the number of inconsistencies regarding potentially critical exchanges” with Adam Kincaid).⁶

“Legislative motivation or intent is a paradigmatic fact question.” *Prejean v. Foster*, 227 F.3d 504, 509 (5th Cir. 2000) (citing *Hunt v. Cromartie*, 526 U.S. 541, 549 (1999)). And although Defendants argue in their application that the Court did not make a presumption of legislative good faith (*see* Stay Br. at 38), the district court did apply the presumption and concluded that it was overcome by the strong direct evidence of the predominant use of race and the State’s failure to provide a compelling interest for its use of race. App. 57-58, 71-72, 76,

⁶ Despite the State’s suggestion to the contrary, *see* Stay Br. at 28, there is no evidence that Rep. Hunter’s many statements about race were an attempt to seem non-discriminatory after having received criticism in 2021. Rep. Hunter did not testify at the preliminary injunction hearing, and there is no “more plausible explanation” of his motives than the direct evidence he provided during the redistricting committee hearings and floor debates and that is in the record. *Id.*

134-37. Defendants ask the Court to stretch the good faith presumption beyond recognition and bless the 2025 map despite the many statements by legislators indicating their predominant use of race.

B. Adam Kincaid Cannot Supply the Congressional Map’s Intent

1. Adam Kincaid did not work for Texas legislators

The district court properly observed “Mr. Kincaid is not a member of the Legislature. The record contains no indication that the Legislature ever told Mr. Kincaid to draw the 2025 Map race-blind[.]” App. 100. In fact, Legislators who sponsored the redistricting bill consistently asserted that they did not know the identity of the map-drawer, did not work with him on drawing the map, and did not know if Adam Kincaid was drawing the new map.⁷

The 2025 congressional map originated in the Texas House. Rep. Hunter, the redistricting bill author, explained that he did not know where his firm got the map but “I’ve sat down them [the firm] with data, like I’ve done in the past.” LULAC App. 32.

During the redistricting bill layout in committee on August 1, 2025, Rep. Hunter repeatedly denied knowing anything about Adam Kincaid drawing the new map. Rep. Hunter said “I have no idea” whether Adam Kincaid sent the map to Rep. Hunter’s law firm to give to him, and he emphasized (in the third person) that “Todd Hunter has no knowledge of Adam Kincaid involved in this.” LULAC App. 31-32. Rep. Hunter stated that Adam Kincaid did not help him draw the map, and also said “if the individual Adam Kincaid was involved on this side [the Texas House], I have no knowledge, absolutely none.” LULAC App. 31-32.

⁷ Mr. Kincaid testified that he did not work at the direction of any state legislator. App. 100; *see also* LULAC App. 123-125, 132.

On July 21, 2025, Senator King, the Chair of the Senate Special Committee on Redistricting, stated, in response to a question about who was drawing the congressional map, “I’m not drawing a map. I don’t know of anyone here today. They may be -- others may be trying to draw a map. I’m not aware of that.” LULAC App. 113.

On August 22, 2025, during the last Senate debate on the redistricting bill and the day before its final passage, Sen. King, stated “I don’t really have any personal knowledge of the inner workings that went into who participated in drawing the maps” and “I’m assuming it was a product of the House author and their counsel.” LULAC App. 70-71.

Sen. King also stated “I haven’t inquired as to who physically drew the maps. I haven’t inquired as to the process, who all was involved in that.” LULAC App. 74-75. Although Sen. King admitted during the Senate floor debate that he knew Adam Kincaid was “involved in that process” of Texas redistricting, Sen. King explained that when he saw Mr. Kincaid recently at a conference, “I specifically told him, ‘Don’t tell me anything you’re doing with regard to map drawing. Don’t tell me about the details of any map if you’re involved in it.’” LULAC App. 76-78.

Even at the preliminary injunction hearing in this case, Sen. King maintained that he did not think of the map as related to Adam Kincaid. LULAC App. 111-112 (“I’m sorry. I just never thought of [the map] in those terms. I thought of it as being the House Map that was filed by the -- by Senator Hunter [sic].”).

In any event, and regardless of his intent, the map Mr. Kincaid created and that was used by legislators satisfied their objectives to target multi-racial districts on the basis of race, and create single-race majority districts that met 50% plus population targets. *See Prejean*, 227 F.3d

at 510 (even if the mapdrawer claimed that his map was based on political and not racial considerations, when the legislature was under pressure from DOJ to create a majority Black district, a “plausible inference is that the legislature was ready to adopt whatever proposal would satisfy its objective of creating a black subdistrict.”).

2. Adam Kincaid’s testimony was post hoc and not credible

Although Adam Kincaid testified at length in the preliminary injunction hearing, his testimony focused largely on geographic areas and districts not challenged in the preliminary injunction motions. *See, e.g.*, LULAC App. 119 (“I started work on the DFW area in actually the Panhandle.”); LULAC App. 120 (By examining counsel: “So in our efforts to understand how you drew DFW, we’re now in far northeast Texas. Can you bring us back to DFW and tell us what happened next in that area as the map drawer?”).

The district court, with the opportunity to evaluate Mr. Kincaid’s testimony and demeanor, and assess his credibility, properly did not credit his testimony. Mr. Kincaid offered shifting criteria. For example, although he testified that his goal was to draw CD 30 to be the most Democratic district of the CD 30 and CD 33 pair, he admitted that he did not shift territory from CD 33 that was more Democratic into CD 30, because he decided to use the footprint of CD 30 as it then existed. *See* LULAC App. 130-131.

Similarly, although Defendants claim now that Mr. Kincaid’s configuration of CD 29 was a “vote sink” on the north side of Houston, Mr. Kincaid did not call CD 29 a “vote sink” in his testimony and Defendants still cannot explain why, if CD 29 was supposed to be “[t]he most Democrat seat I could draw in the area” it is not more Democratic than its neighbor CD 18. *Compare* App. 503 *with* LULAC App. 103.

In the preliminary injunction hearing, Mr. Kincaid presented a series of demonstrative maps that purported to illustrate how he redistricted using partisan shading, but he conceded that he made the demonstratives for the court hearing and did not keep screenshots of his actual work. LULAC App. 138-139. Mr. Kincaid used an inconsistent color scheme in each of his after-the-fact demonstratives – a color scheme that he chose to best fit the boundaries of each district after he drew it, as opposed to reflecting the data he looked at while mapping. LULAC App. 140-146 (presenting color schemes based on support for President Trump of, variously, 20, 29.1%, 30%, 31%, 35%, 38.7%, 40%, 42.9, 44% and 50%). *See Bethune-Hill v. Virginia State Bd. of Elections*, 580 U.S. 178, 189–90 (2017) (“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.”).

Mr. Kincaid testified that he was aware of the racial composition of the population he was mapping, even as he claimed not to see racial data while he mapped. Mr. Kincaid conceded that when drawing CD 9 and CD 18 in Houston, he “knew it was a heavily African American area” and that CD 29 was a majority Hispanic district that was able to elect the Latino candidate of choice. LULAC App. 149-150. Mr. Kincaid had drawn a Hispanic majority version of CD 29 in 2021 for the Texas Republican congressional delegation, knew the district had elected Congresswoman Sylvia Garcia, and knew in 2025 that he was assigning geography from CD 29 to the new Republican-leaning CD 9. *See* LULAC App. 135, 136, 148.

Mr. Kincaid conceded that because of the data in his computer system, he could turn on and view the real-time impact of his changes on the racial makeup of districts as he made them, if he chose to do so, even if he was otherwise shading based on political performance. LULAC

App. 147. He also acknowledged that, when he finishes a map, he is able to produce a report that says what is the Hispanic CVAP of a particular district. LULAC App. 133.

Ultimately, the district court concluded that Mr. Kincaid was not credible when he testified that he drew districts race-blind but somehow achieved the results demanded by the DOJ letter and with margins of between 50 and 51% single-race CVAP in the districts named by DOJ. App. 96-99.

3. Although Plaintiffs were not Required to Provide an Alternative map to Obtain Preliminary Injunctive Relief, Plaintiffs Demonstrated that the State Could Meet its Partisan Goals with Alternative District Configurations

The 3-judge panel properly concluded that, in light of their direct evidence, Plaintiffs need not produce an alternative map. App. 132 ([T]he Plaintiff Groups here have produced *substantial direct evidence* indicating that race was the predominant driver in the 2025 redistricting process [and] this case is not the sort of ‘circumstantial-evidence-only case’ in which *Alexander*’s adverse inference is typically dispositive.”) (emphasis added).

Even if Plaintiffs were required to provide map alternative evidence (and they are not), Plaintiffs did demonstrate that the State could meet its partisan goals with alternative configurations that did not make predominant use of race. For example, LULAC Plaintiffs’ expert Dave Ely, who has decades of experience drawing redistricting plans in litigation and for jurisdictions, testified that he could have maintained CD29 as a Hispanic CVAP majority district while creating a majority Republican CD9. LULAC App. 109 (“[Y]ou would be able to maintain this CD9 as a Republican district and leave 29 as -- as an effective majority Latino district, and not disrupt the partisan balance of the other Republican districts.”).

Mr. Kincaid conceded that he could have created a CD 9 that met his 60% President Trump 2024 target for Republican incumbents, but that by swapping precincts back and forth with CD 36 to improve the Republican performance of CD 9, it was “certainly possible” that CD 9’s Hispanic CVAP would have dropped below 50 percent. LULAC App. 137. Finally, the Court noted that Dr. Duchin “generated tens of thousands of pro-Republican maps that obey traditional redistricting principles without producing the enacted map’s exaggerated racial features[.]” App. 134.

II. Defendants have not demonstrated a likelihood that irreparable harm will result from the denial of a stay and the Public Interest Weighs in Favor of Plaintiffs.

Defendants have not shown that the balance of harms tips in their favor or that the stay will not “substantially injure the other parties” or the public interest. *Nken*, 556 U.S. at 434. Although “[w]hen a statute is enjoined, the State necessarily suffers the irreparable harm of denying the public interest in the enforcement of its laws. . . neither [the State] nor the public has any interest in enforcing a regulation that violates federal law.” *Book People, Inc. v. Wong*, 91 F.4th 318, 341 (5th Cir. 2024) (cleaned up).

Any harm to the State in using the current 2021 enacted redistricting plan, which, until August 2025, was the State’s only redistricting plan, “pales in comparison and importance to the harms” threatened to LULAC Plaintiffs’ members if they are forced to cast their ballots in unconstitutionally racially gerrymandered districts. *Louisiana v. Biden*, 55 F.4th 1017, 1035 (5th Cir. 2022).

Furthermore, because the *status quo* congressional redistricting plan is the plan under which Texas voters cast ballots only a few weeks ago, maintaining the 2021 plan creates the least confusion for voters because it does not involve changes in either district or precinct boundaries.

See Am. Encore v. Fontes, 152 F.4th 1097, 1121 (9th Cir. 2025) (“Only “under certain circumstances, such as where an impending election is imminent and a State’s election machinery is already in progress” is *Purcell* implicated.”). The *Purcell* doctrine protects voters, first and foremost.

The 2021 congressional redistricting plan is correctly apportioned and the product of what Defendants maintain was a race-blind mapping process by the Texas Legislature. *See* LULAC App. 7-8 (July 11, 2025 Letter from Texas Attorney General Paxton to Assistant Attorney General Dhillon) (“However, my office has just completed a four-week trial against various plaintiff groups concerning the constitutionality of Texas’s congressional districts The evidence at that trial was clear and unequivocal: the Texas legislature did not pass race-based electoral districts for any of those three political maps.”).

Texas election administrators have the district and precinct boundaries for the 2021 plan in their county systems, and continued use of the 2021 plan imposes no additional costs on the election infrastructure of Texas.

The candidate filing period for Congress does not close until December 8, 2025. LULAC App. 152-153. The district court’s injunction preserves the *status quo* for voters and affords candidates time to make a final decision about the districts in which they plan to run for office.

Governor Abbott’s decision to call special election runoffs in two of Texas’s largest counties at the end of January 2026 only reinforces the fact that the status quo is the 2021 redistricting plan, and the public interest is best served by denying a stay.

CONCLUSION

For the foregoing reasons, as well as those set forth in the briefing of the other Respondents, which are incorporated herein by reference, LULAC Respondents respectfully request that the Court deny the Emergency Application for Stay and Administrative Stay Pending Appeal.

Respectfully submitted,

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APPENDIX

INDEX

	<u>Page</u>
July 7, 2025 Dep't of Justice Letter	LULAC App. 1
Governor's Proclamation (July 9, 2025).....	LULAC App. 3
July 11, 2025 Letter from Texas Attorney General	LULAC App. 6
June 23, 2025 Press Release Announcing Special Session	LULAC App. 10
Dustin Burrow's August 20, 2025 X Post	LULAC App. 12
Special Legislative Session Transcript Excerpts.....	LULAC App. 13
Media Interview Transcript Excerpts.....	LULAC App. 80
Texas Legislative Council Report Excerpts	LULAC App. 92
Preliminary Injunction Hearing Transcript Excerpts	LULAC App. 104
Special Legislative Session Transcript Excerpts (Cont.)	LULAC App. 168



U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

Washington, D.C. 20530

July 7, 2025

The Honorable Gregory Abbott
Office of the Governor
Texas Capitol
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Austin, Texas 78701

[REDACTED]

The Honorable Ken Paxton
Office of the Attorney General of Texas
Attention: Austin Kinghorn/Ryan Walters
Post Office Box 12548
Austin Texas 78711-2548

Re: Unconstitutional Race-Based Congressional Districts
TX-09, TX-18, TX-29 and TX-33

Dear Governor Abbott and Attorney General Paxton,

This letter will serve as formal notice by the Department of Justice to the State of Texas of serious concerns regarding the legality of four of Texas's congressional districts. As stated below, Congressional Districts TX-09, TX-18, TX-29 and TX-33 currently constitute unconstitutional "coalition districts" and we urge the State of Texas to rectify these race-based considerations from these specific districts.

In *Allen v. Milligan*, 599 U.S. 1, 45 (2023), Justice Kavanaugh noted that "even if Congress in 1982 could constitutionally authorize race-based redistricting under § 2 for some period of time, the authority to conduct race-based redistricting cannot extend indefinitely into the future." 599 U.S. 1, (Kavanaugh, J., concurring). In *SFFA v. Harvard*, the Supreme Court reiterated that "deviation from the norm of equal treatment" on account of race "must be a temporary matter." 600 U.S. 181, 228 (2023). When race is the predominant factor above other traditional redistricting considerations including compactness, contiguity, and respect for political subdivision lines, the State of Texas must demonstrate a compelling state interest to survive strict scrutiny.

It is well established that so-called “coalition districts” run afoul the Voting Rights Act and the Fourteenth Amendment. In *Petteway v. Galveston County*, No. 23-40582 (5th Cir. 2024), the en banc Fifth Circuit Court of Appeals made it abundantly clear that “coalition districts” are not protected by the Voting Rights Act. This was a reversal of its previous decision in *Campos v. City of Baytown*, 840 F.2d 1240 (5th Cir. 1988). In *Petteway*, the Fifth Circuit aligned itself with the Supreme Court’s decision in

Bartlett v. Strickland, 556 U.S. 1 (2009), and determined that a minority group must be geographically compact enough to constitute more than 50% of the voting population in a single-member district to be protected under the Voting Rights Act. See also *Thornburg v. Gingles*, 478 U.S. 30 (1986). Opportunity and coalition districts are premised on either the combining of two minority groups or a minority group with white crossover voting to meet the 50% threshold. Neither meets the first *Gingle*’s precondition. Thus, the racial gerrymandering of congressional districts is unconstitutional and must be rectified immediately by state legislatures.

It is the position of this Department that several Texas Congressional Districts constitute unconstitutional racial gerrymanders, under the logic and reasoning of *Petteway*. Specifically, the record indicates that TX-09 and TX-18 sort Houston voters along strict racial lines to create two coalition seats, while creating TX 29, a majority Hispanic district. Additionally, TX-33 is another racially-based coalition district that resulted from a federal court order years ago, yet the Texas Legislature drew TX-33 on the same lines in the 2021 redistricting. Therefore, TX-33 remains as a coalition district.

Although the State’s interest when configuring these districts was to comply with Fifth Circuit precedent prior to the 2024 *Petteway* decision, that interest no longer exists. Post-*Petteway*, the Congressional Districts at issue are nothing more than vestiges of an unconstitutional racially based gerrymandering past, which must be abandoned, and must now be corrected by Texas.

Please respond to this letter by July 7, 2025, and advise me of the State’s intention to bring its current redistricting plans into compliance with the U.S. Constitution. If the State of Texas fails to rectify the racial gerrymandering of TX-09, TX-18, TX-29 and TX 33, the Attorney General reserves the right to seek legal action against the State, including without limitation under the 14th Amendment.

Respectfully,



HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

MICHAEL E. GATES
Deputy Assistant Attorney General
Civil Rights Division



GOVERNOR GREG ABBOTT

July 9, 2025

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FILED IN THE OFFICE OF THE
TEXAS SECRETARY OF STATE
3:00 pm O'CLOCK

JUL 09 2025
ANBA
Secretary of State

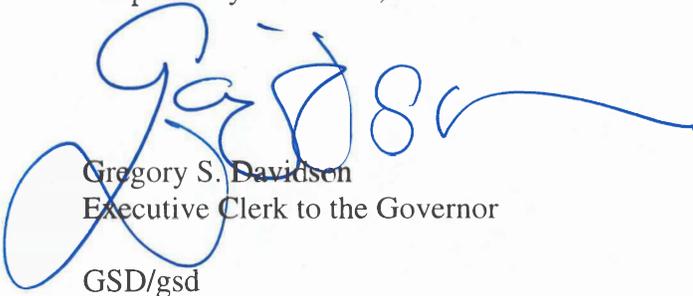
Dear Mr. Bitter:

Pursuant to his powers as Governor of the State of Texas, Greg Abbott has issued the following:

A proclamation calling an extraordinary session of the 89th Legislature, to convene in the City of Austin, at noon on Monday, July 21, 2025.

The original proclamation is attached to this letter of transmittal.

Respectfully submitted,


Gregory S. Davidson
Executive Clerk to the Governor
GSD/gsd

Attachment



PROCLAMATION
BY THE
Governor of the State of Texas

TO ALL TO WHOM THESE PRESENTS SHALL COME:

I, GREG ABBOTT, Governor of the State of Texas, by the authority vested in me by Article III, Sections 5(a) and 40, and Article IV, Section 8(a) of the Texas Constitution, do hereby call a Special Session of the 89th Legislature, to convene in the City of Austin, commencing at 12:00 p.m. on Monday, July 21, 2025, to consider and act upon the following:

Legislation to improve early warning systems and other preparedness infrastructure in flood-prone areas throughout Texas.

Legislation to strengthen emergency communications and other response infrastructure in flood-prone areas throughout Texas.

Legislation to provide relief funding for response to and recovery from the storms which began in early July 2025, including local match funding for jurisdictions eligible for FEMA public assistance.

Legislation to evaluate and streamline rules and regulations to speed preparedness for and recovery from natural disasters.

Legislation to eliminate the STAAR test and replace it with effective tools to assess student progress and ensure school district accountability.

Legislation reducing the property tax burden on Texans and legislation imposing spending limits on entities authorized to impose property taxes.

Legislation making it a crime to provide hemp-derived products to children under 21 years of age.

Legislation to comprehensively regulate hemp-derived products, including limiting potency, restricting synthetically modified compounds, and establishing enforcement mechanisms, all without banning a lawful agricultural commodity.

Legislation further protecting unborn children and their mothers from the harm of abortion.

Legislation prohibiting taxpayer-funded lobbying, including the use of tax dollars to hire lobbyists and payment of tax dollars to associations that lobby the Legislature.

Legislation, similar to Senate Bill No. 1278 from the 89th Legislature, Regular Session, that protects victims of human trafficking from criminal liability for non-violent acts closely tied to their own victimization.

Legislation that protects law enforcement officers from public disclosure of unsubstantiated complaints in personnel files.

Legislation protecting women's privacy in sex-segregated spaces.

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JUL 09 2025

Governor Greg Abbott
July 9, 2025

Proclamation
Page 2

Legislation proposing a constitutional amendment allowing the Attorney General to prosecute state election crimes.

Legislation that provides a revised congressional redistricting plan in light of constitutional concerns raised by the U.S. Department of Justice.

Legislation, similar to Senate Bill No. 648 from the 89th Legislature, Regular Session, that provides strengthened protections against title theft and deed fraud.

Legislation, similar to Senate Bill No. 1253 from the 89th Legislature, Regular Session, that authorizes political subdivisions to reduce impact fees for builders who include water conservation and efficiency measures.

Legislation, similar to Senate Bill No. 2878 from the 89th Legislature, Regular Session, relating to the operation and administration of the Judicial Department of state government.

The Secretary of State will take notice of this action and will notify the members of the legislature of my action.



IN TESTIMONY WHEREOF, I have hereunto signed my name and have officially caused the Seal of State to be affixed at my office in the City of Austin, Texas, this the 9th day of July, 2025.


GREG ABBOTT
Governor

Attested by:


ADAM BITTER
General Counsel
Secretary of State

FILED IN THE OFFICE OF THE
SECRETARY OF STATE
3:00 PM O'CLOCK

JUL 09 2025

**State Defendants' Response to Plaintiff-Intervenors'
and TXNAACP Motion for Preliminary Injunction**

Exhibit AF

Attorney General Letter responding to DOJ



KEN PAXTON
ATTORNEY GENERAL OF TEXAS

July 11, 2025

The Honorable Harmeet K. Dhillon
Assistant Attorney General
U.S. Department of Justice, Civil Rights Division
950 Pennsylvania Ave., NW
Washington, DC 20530
Harmeet.Dhillon@usdoj.gov

Dear Assistant Attorney General Dhillon,

I am in receipt of your July 7, 2025, letter concerning Texas congressional districts and welcome a discussion both of the constitutionality of those districts, and how they can best serve Texans. I fully support Governor Abbott calling a special session for the Texas Legislature to conduct congressional redistricting to take advantage of recent changes to the legal and political landscape.

As you know, I have stood shoulder to shoulder with President Trump in fighting for the constitutional rights of Texans, and of all Americans. My office filed 107 lawsuits against the unconstitutional policies of the Biden-Harris Administration, setting the constitutional framework for opposing the liberal agenda including DEI, open borders, anti-gun hysteria, and transgender procedures forced on children. I also filed the landmark *Texas v. Pennsylvania* lawsuit and have vigorously defended one of the most comprehensive election integrity bills anywhere in the country. Nothing is more important to me or the office I am proud to lead than upholding the Constitution and combatting the left-wing assault on American values.

We agree that the time for race-based decisions in government is over. As Chief Justice Roberts wrote in *SFFA v. Harvard*, "Eliminating racial discrimination means eliminating all of it." 600 U.S. 181, 206 (2023). We also agree that Justice Kavanaugh has acknowledged temporal constraints on race-based decisions required under Section 2 of the Voting Rights Act. *Allen v. Milligan*, 599 U.S. 1, 45 (2023) (Kavanaugh, J., concurring).

I am also keenly aware of the Fifth Circuit's decision in *Petteway v. Galveston County*, 111 F.4th 596 (5th Cir. 2024) (*en banc*). My office successfully briefed that case's implications for Texas

congressional districts earlier this year. *See* First Amended Motion for Partial Judgment, *LULAC v. Abbott*, No. 3:21-cv-00259 (W.D. Tex. Feb. 15, 2025), ECF 848; *see also* Defendants' Brief Addressing the Effect of *Petteway*, *id.*, ECF 815. Indeed, a coalition claim under the Voting Rights Act brought against Texas Congressional District 18 has been dismissed under *Petteway*. *See* Order Granting Motion to Dismiss, *id.*, ECF 972; *see also* Response to Order Requiring Additional Briefing, *id.*, ECF 917. Around the same time—which is to say, after the *Petteway* decision—your office dismissed all of its claims against Texas election districts. I agreed with your decision in that regard, and still do. I applaud your leadership and legal acumen in recognizing the futility of the claims brought against Texas under the Biden-Harris administration.

We also agree that, had the Texas legislature felt compelled under pre-*Petteway* strictures to create coalition districts, the basis for such decisions—as you say—“no longer exists.” However, my office has just completed a four-week trial against various plaintiff groups concerning the constitutionality of Texas’s congressional districts, as well as its State House and State Senate maps. The evidence at that trial was clear and unequivocal: **the Texas legislature did not pass race-based electoral districts for any of those three political maps**. Texas State Senator Joan Huffman, who chaired the Senate Redistricting Committee, testified under oath that she drew Texas districts blind to race, and sought to maximize Republican political advantage balanced against traditional redistricting criteria. *See, e.g.*, Tr. Jun. 7, 2025, PM Session at 33; Tr. Jun 9, 2025, AM Session at 54. Dr. Sean Trende, renowned redistricting expert, testified on behalf of Texas that its electoral maps correlate more closely with partisan advantage than any racial consideration. *See* Tr. Jun. 9, 2025, AM Session at 67–177, *id.*

Finally, we agree that there have been substantial changes in the law since Texas drew its congressional districts in 2021. In the four short years since then, the Supreme Court has issued *Milligan*, *SFFA*, and *Alexander v. South Carolina State Conference of the NAACP*, 602 U.S. 1 (2024). At the same time, voting patterns in the state have undergone tremendous change, including—as you are certainly aware—Texas’s historic support for President Trump in the 2024 Presidential Election.

The Texas Legislature has led the Nation in rejecting race-based decision-making in its redistricting process—it has drawn its current maps in conformance with traditional, non-racial redistricting criteria to ensure Texas continues to adopt policies that will truly Make America Great Again. As permitted by federal law, the congressional maps in 2021 were drawn on a partisan basis. *See Rucho v. Common Cause*, 588 U.S. 684 (2019).

For these reasons, I welcome continued dialogue about how Texas's electoral districts can best serve Texas voters without regard to outdated and unconstitutional racial considerations. My office stands ready to support President Trump, Governor Abbott, and the Texas Legislature in their redistricting goals and will defend any new maps passed from challenges by the radical Left.

Respectfully,

A handwritten signature in black ink that reads "Ken Paxton". The signature is written in a cursive, flowing style.

Governor Abbott Announces Special Session Date, Initial Agenda

 gov.texas.gov/news/post/governor-abbott-announces-special-session-date-initial-agenda

June 23, 2025 | Austin, Texas | [Press Release](#)

Signs 1,155 Bills, Vetoes 28 Bills For 89th Regular Legislative Session

Governor Greg Abbott today announced the final list of 1,155 bills [signed](#) into law and 28 bills [vetoed](#) from the 89th Regular Legislative Session. Governor Abbott's veto statements may be viewed [here](#) and [here](#). The Governor also announced he will call a Special Session to begin on Monday, July 21, along with an initial list of agenda items. “Working with the Texas Legislature, we delivered results that will benefit Texans for generations to come,” said Governor Abbott. “Lieutenant Governor Dan Patrick, Speaker Dustin Burrows, and the Texas House and Senate worked hard to send critical legislation to my desk. This session has seen monumental success, but there is more we can do.” All seven of Governor Abbott’s emergency items passed the Texas Legislature and were signed into law:

- [Property Tax Relief](#)
- [Generational Investment in Water](#)
- [Raise Teacher Pay](#)
- [Expand Career Training](#)
- [School Choice](#)
- [Bail Reform](#)
- [Creation of the Texas Cyber Command](#)

Additionally, Governor Abbott:

- [Signed](#) 1,155 bills
- [Vetoed](#) 28 bills
- Signed the 2026-2027 [General Appropriations Act](#) and the [Supplemental Budget](#)

At this time, the Governor has identified several bills that were vetoed or filed without signature that will be placed on the upcoming Special Session agenda for further consideration:

- [Senate Bill 3](#): Relating to the regulation of products derived from hemp, including consumable hemp products and the hemp-derived cannabinoids contained in those products.

- [Senate Bill 648](#): Relating to recording requirements for certain instruments concerning real property.
- [Senate Bill 1253](#): Relating to impact and production fees for certain water projects and to the regulation of certain wells; authorizing a fee.
- [Senate Bill 1278](#): Relating to an affirmative defense to prosecution for victims of trafficking of persons or compelling prostitution.
- [Senate Bill 1758](#): Relating to the operation of a cement kiln and the production of aggregates near a semiconductor wafer manufacturing facility.
- [Senate Bill 2878](#): Relating to the operation and administration of and practices and procedures related to proceedings in the judicial branch of state government.



Dustin Burrows ✓

@Burrows4TX



Speaker Dustin Burrows Praises Texas House Passage of Congressional Redistricting Bill

#txlege

FOR IMMEDIATE RELEASE

August 20, 2025

CONTACT

Kimberly.Carmichael@speaker.texas.gov

Speaker Dustin Burrows Praises Texas House Passage of Congressional Redistricting Bill

AUSTIN, Texas – Speaker of the Texas House Dustin Burrows today issued the following statement praising final passage of House Bill 4, the House’s congressional redistricting bill answering Governor Abbott’s special session call:

“The Texas House today delivered legislation to redistrict certain congressional districts to address concerns raised by the Department of Justice and ensure fairness and accuracy in Texans’ representation in Congress. I want to thank Representative Todd Hunter for carrying this bill and for his tireless efforts ensuring the new map is not only constitutional, but secures Republican representation in Congress. Led by Chairman Cody Vasut, members of the House Select Committee on Congressional Redistricting traveled across the state to hold hearings and gather input from Texans. This work has helped us deliver the legal, remedied maps Texas voters deserve. These past few weeks have not been easy, but the House members who showed up for work every day have shown a dedication to their constituents that will not be forgotten. Today’s passage of the congressional map has ushered in a new chapter of Republican unity, and I am proud to have led my colleagues in this important achievement. The other items on the special session call require the House to move past our differences, and I expect us to work together to deliver relief to Texans and implement critical safeguards to keep our children and communities safe from future disasters.”

6:59 PM · Aug 20, 2025 · **19.5K** Views

241

59

231

6



BROOKS PLAINTIFFS' EXHIBIT

282

TRANSCRIPTION OF VIDEOTAPE
TEXAS HOUSE OF REPRESENTATIVES
COMMITTEE ON CONGRESSIONAL REDISTRICTING
Friday, August 1, 2025



1 Another important law that we
2 have to follow -- and you've heard in the
3 hearings, Members -- is the voting rights act
4 of 1965. And although race cannot be a
5 predominant factor is drawing maps, Section 2
6 prohibits enactment of any plan that restricts
7 minority citizens from having an opportunity to
8 elect their preferred candidate of choice if
9 certain circumstances exist.

10 Now, this plan includes
11 political considerations, the public testimony
12 from the hearings, population growth, which has
13 occurred, and recent changes in voter trends.
14 The proposed plan redraws -- and I want
15 everybody to know this -- 37 of the 38
16 congressional districts to some degree.

17 The primary changes, though, are
18 focused on five districts for partisan
19 purposes. It is important to note that four of
20 the five new districts are majority minority
21 Hispanic CVAP districts, Citizen Voting Age
22 Population, four of the five new districts.

23 Each of these newly-drawn
24 districts now trend Republican in political
25 performance. It doesn't guarantee electoral

1 Now, Representative Turner, what
2 I will do, to accommodate your request, given
3 what you've flagged for me, I will extend
4 witness registration to 11:15; and we will
5 revisit this if we have to.

6 Witness registration will be
7 extended to 11:15 a.m. If we have to revisit
8 it, we will.

9 Thank you, Mr. Turner.

10 Anything else, Mr. Turner?

11 REP. TURNER: No.

12 CHAIRPERSON VASUT: Thank you.

13 The Chair will recognize
14 Mr. Hunter to continue his layout.

15 REP. HUNTER: So there are five
16 new districts: 9, which is Houston area; 28,
17 which is the Valley, South, Rio Grande Valley;
18 32, Dallas area; 34, Coastal and South; and 35,
19 San Antonio area.

20 Congressional District 9, the
21 new district, has a 50.5-percent Hispanic CVAP.
22 CD 28 -- that's the Valley South -- has an
23 86.70-percent Hispanic CVAP. CD 32 is a -- and
24 remains a non-minority direct; CD 34, 71.9
25 percent, is now a Hispanic CVAP. And CD 35,

1 which is San Antonio, is now a 51.6-percent
2 Hispanic CVAP.

3 Now, let me give you some
4 information, data points, in comparison to the
5 2021 plan. The law has changed since 2021.
6 Population has changed since 2021. Voting
7 trends have changed since 2021.

8 In the 2021 plan, there were 9
9 -- that's 9 -- Hispanic majority voting age
10 districts. In this plan there are 10 Hispanic
11 majority voting age districts. In the 2021
12 plan, there were 7 Hispanic citizen voting age
13 districts; and under this plan, there are 8.

14 There were no majority Black
15 CVAP, Citizen Voting Age Population, districts
16 under the 2021 plan. In the proposed plan
17 today, there are 2 majority CVAP districts.
18 CD 18 is now 50.8 percent Black CVAP; in 2021
19 it was 38.8.

20 CD 30 is now 50.2 percent Black
21 CVAP; in 2021 it was 46 percent.

22 Now, overall, these are the
23 changes. There are primarily five. It does
24 affect congressional districts in, I think my
25 memory is, pretty much everybody but one in the

1 REP. HUNTER: Correct.

2 REP. SPILLER: All right. And
3 so, in fact, the opinion in the Petteway case
4 said several times that minority vote dilution
5 coalitions are impermissible. So, you know, it
6 overruled; and, specifically, is it your
7 recollection that the Petteway case overruled
8 that Campos case that previously --

9 REP. HUNTER: That is --
10 (Simultaneous speakers.)

11 REP. SPILLER: -- from 1988?

12 REP. HUNTER: That is correct.

13 REP. SPILLER: Okay. So the law
14 changed; and, to your knowledge, in simple
15 terms, the Petteway case, to your knowledge,
16 was it ever appealed to the U.S. Supreme Court?

17 REP. HUNTER: In connection to
18 where it is in the process, I don't know. I
19 know the Fifth Circuit ruled, but I do not know
20 the legal process on where it stands today.

21 REP. SPILLER: To your
22 knowledge, as far as you know, the Supreme
23 Court has not considered --

24 REP. HUNTER: Right now the
25 Fifth Circuit case is what we're acting under.

1 a couple of terms. In redistricting, in that
2 process, you're familiar with that term CVAP,
3 which my understanding is stand for Citizen
4 Voting Age Population; is that correct?

5 REP. HUNTER: That's correct.

6 REP. SPILLER: All right. And
7 you look to that; and, also, we sometimes hear
8 the word VAP, which is referring to Voting Age
9 Population, similar?

10 REP. HUNTER: That's correct.

11 REP. SPILLER: All right. So
12 let's talk about District 18 in Harris County,
13 what is referred to as the Barbara Jordan
14 district. Is it your understanding that
15 District 18 was or it currently is a coalition
16 district?

17 REP. HUNTER: Let me pull up
18 some of the information that I have so I can
19 give you what I have.

20 I am not going to be able to
21 tell you that I personally know it's a
22 coalition-type district --

23 REP. SPILLER: Okay.

24 REP. HUNTER: -- but I can tell
25 you that, under this plan, that it becomes a

1 real performing Black CVAP district.

2 REP. SPILLER: Right. And I
3 would submit to you that it is currently a
4 coalition district; under HB 4, it would not
5 be. Coalition districts are the type that are
6 addressed in the Petteway case; and so I would
7 submit to you that it goes from a coalition
8 district to a majority Black CVAP district,
9 being 58.1 percent Black.

10 REP. HUNTER: That is correct.

11 REP. SPILLER: Okay. And,
12 previously -- it's kind of redundant -- but
13 Blacks did not have a majority in that
14 district. And now, they do, under your plan;
15 is that correct?

16 REP. HUNTER: Again, previously,
17 I can't recall; but the 50.81 percent is the
18 data given to me, that CD 18 is now a Black
19 CVAP, Citizen Voting Age Population, district.

20 REP. SPILLER: Okay. And is it
21 also fair to say that we heard testimony about
22 being compact and how some of these districts
23 looked -- we talked about gerrymanders, how
24 they looked like a salamander, how they looked
25 bizarre and they wrapped around. And was there

1 certainly, you think District 18, under HB 4
2 meets that criteria and attempts to do that?

3 REP. HUNTER: It does and 18
4 does have a history and that does have
5 different patterns throughout history. If you
6 look at the original, I think in the '70s, to
7 this, it's kind of changed back to the history;
8 but it is probably a bit more compact and the
9 percentage for Black CVAP is better.

10 REP. SPILLER: All right. Let's
11 talk about District 9. My understanding is
12 District 9 was also a coalition district; and
13 under HB 4, it changes from a coalition
14 district to a majority Hispanic CVAP district.
15 Do you know whether that's correct or not?

16 REP. HUNTER: Well, what we're
17 doing, it moves -- District 9 is basically --
18 in 2021 the Hispanic CVAP was 25.73. The Black
19 CVAP was 45.06. In this proposal the Hispanic
20 CVAP is 50.41.

21 REP. SPILLER: Okay. All right.
22 So, previously, Hispanics did not hold a
23 majority in that district; and under this
24 scenario, under HB 4, they now do, correct?

25 REP. HUNTER: Well, according to

1 the CVAP.

2 REP. SPILLER: Right.

3 REP. HUNTER: According to the
4 CVAP.

5 REP. SPILLER: All right. Let's
6 talk about District 29. Under HB 4 I think it
7 went from a majority Hispanic CVAP to a
8 majority Hispanic VAP district. I don't know
9 if you know if that's correct. I would purport
10 to you that it is now a 55-percent Hispanic
11 district and should overwhelmingly perform
12 Democrat. Is that a fair statement?

13 REP. HUNTER: In connection with
14 29, if, under this plan, it becomes more
15 heavily Democrat -- I think the calculation is
16 plus 70 percent -- it moves from a Hispanic
17 majority CVAP district to what they call a
18 non-Hispanic majority CVAP district.

19 For example, in 29, the Black
20 CVAP goes from 18.31 percent in 2021 to 32.79
21 percent under this proposal.

22 REP. SPILLER: All right. Let
23 me -- lastly, I want to talk about District 7.
24 We heard some testimony in two different places
25 about -- at least two, if not three -- talking

1 REP. SPILLER: All right. And
2 isn't it true, if you know, that 25 -- the
3 current Republican seats that are 25, that the
4 average partisan loss on those remaining, on
5 all those seats, is only about a 1.5-percent
6 difference, or less, Republican than they
7 currently are now? Are you aware of that?

8 REP. HUNTER: I'm not aware.

9 REP. SPILLER: Okay so you
10 wouldn't know that of the other two, the two
11 lowest performing -- were 55 percent and 57
12 percent -- but all the other 23 range anywhere
13 from 61 percent to 78 percent, which still
14 provides a strong Republican performing strict.

15 REP. HUNTER: And that makes
16 sense.

17 REP. SPILLER: And, again,
18 there's nothing wrong with that?

19 REP. HUNTER: Correct, under the
20 cases that you've --

21 REP. SPILLER: Correct.

22 So, in summary, is it your
23 testimony here today that you believe that the
24 map created under HB 4 is in compliance with
25 the Petteway case and in compliance with

1 existing federal law?

2 REP. HUNTER: Yes.

3 REP. SPILLER: All right. And
4 do you believe that HB 4 is a congressional map
5 that the majority of Texans would approve and
6 desire?

7 REP. HUNTER: I think they will
8 approve, yes.

9 REP. SPILLER: Okay. And do you
10 believe that HB 4 is a Congressional map that
11 support the majority of Texans that voted for
12 President Trump's agenda for Texas and our
13 nation.

14 REP. HUNTER: Now, that, I don't
15 know because I'd have to go ask everybody; but
16 I think the political trend, the answer would
17 be, "Yes."

18 REP. SPILLER: And I would agree
19 with you.

20 I just want to -- in closing,
21 I just want to say I want to thank you for
22 the work that you've done, the study and the
23 expertise that you bring to this process.
24 And I think the State of Texas owes you,
25 Chair Vasut, and Speaker Burrows a debt of

1 REP. THOMPSON: Okay. And did
2 he help you draw this map?

3 REP. HUNTER: Adam Kincaid?

4 REP. THOMPSON: Yeah.

5 REP. HUNTER: No.

6 REP. THOMPSON: Okay. So this
7 is a result of your work only?

8 REP. HUNTER: No.

9 REP. THOMPSON: Well, whose --
10 who is it the result of? It's not this
11 committee because I haven't had a thing, no
12 input except this --

13 REP. HUNTER: You're right. I
14 worked on the map with the law firm of Butler
15 Snow, like I did in 2021, and they provided me
16 the information and we gave it to the chairman
17 of this committee for me to file.

18 REP. THOMPSON: So I'm assuming
19 that they had experts also working with them.

20 REP. HUNTER: I'm presuming they
21 did.

22 REP. THOMPSON: Do you know who
23 they were.

24 REP. HUNTER: No.

25 REP. THOMPSON: Okay then. And

1 REP. HUNTER: Yes.

2 REP. PIERSON: So in the
3 proposed map that you've introduced, this
4 district is now also more compact with those
5 less-intrusive boundaries and actually keeps
6 counties whole; is that accurate?

7 A. To the best of my knowledge, correct.

8 REP. PIERSON: And this is one
9 of the coalition districts that is one of the
10 new majority Hispanic CVAP districts; is that
11 correct?

12 REP. HUNTER: Well, again --
13 [SEVERAL SECONDS OF BLANK VIDEO.]

14 REP. HUNTER: -- is 51.57
15 percent. It's an increase of 5.71 change.

16 REP. PIERSON: So given the
17 testimony that we did hear in the field
18 hearings from the citizens in San Antonio, the
19 way that you've drawn this district today gives
20 San Antonio its own district reconciling those
21 concerns; is that accurate?

22 REP. HUNTER: Correct.

23 REP. PIERSON: So since you've
24 established that the lines were drawn through
25 performance and compactness, I want to go back

[THIS PAGE INTENTIONALLY LEFT BLANK]

1 the 2021 litigation.

2 REP. MANUEL: Okay.

3 REP. HUNTER: So I think we're
4 all presuming that there's been a decision by
5 the federal court, but 2021 maps are what
6 you're in right now.

7 REP. MANUEL: Correct.

8 REP. HUNTER: And that has not
9 been determined to be wrong and there was a
10 letter, but I don't -- my view is I'm going to
11 2025. And they can then review the map, if
12 passed, to tell me if it's okay or not.

13 REP. MANUEL: Okay. So -- and I
14 also just want to get something on the record.
15 So Congressional Districts 9, 18, 30, and 35
16 are each between 50 and 52 percent for Hispanic
17 and Black voting age, depending on different --
18 for their data. So that's just coincidence
19 that that happened if we're not, or was that
20 done intentionally?

21 REP. HUNTER: Which ones --

22 REP. MANUEL: The reason I'm
23 asking is because --

24 REP. HUNTER: -- are you asking,
25 9, 18?

1 REP. MANUEL: 9, 18, 30, and 35.
2 They -- okay. I don't -- I'm not going to say
3 "packed" or "cracked." What I'm going to say
4 is Congressional Districts 9, 18, 30, and 35,
5 they're --

6 REP. HUNTER: We've increased
7 the CVAP is what you're saying?

8 REP. MANUEL: Yes, it's between
9 50 and 52 percent.

10 So is that just a coincidence
11 that we're not supposed to be looking at race;
12 but now, they've been all increased in either
13 Hispanic Voting Age Population or Black Voting
14 Age Population? If we're not supposed to be
15 looking at race, it's -- I'm just -- I know
16 some people say there are no coincidences; but
17 we have four districts that now are -- have
18 been increased with Black population; and I was
19 wondering if that was taken into consideration
20 when we added those to these current maps for
21 2025.

22 REP. HUNTER: No, some of those
23 you mentioned were not Black increased; they
24 were Hispanic.

25 REP. MANUEL: Or -- right

1 because it's separate, but I was saying: Is it
2 a coincidence that that --

3 REP. HUNTER: Nothing's a
4 coincidence. It was increased, and probably
5 part of the reason it was increased was to
6 follow the compactness contiguous. And some of
7 the districts were historic, and so there's
8 been a growth; and you bring them back to the
9 configuration, they're going to go back to the
10 increase. Most of the ones that you have
11 referenced were maybe what Representative
12 Pierson said on the compact and the
13 configuration.

14 REP. MANUEL: Okay. Do we know
15 who at the law firm was the one whose hand was
16 on the mouse, making the maps? And if this was
17 answered already, I apologize.

18 REP. HUNTER: No, no, I'm glad
19 you asked it. I've been asked this for as long
20 as I've been in the legislature. Let me just
21 be honest with everybody.

22 REP. MANUEL: Uh-huh.

23 REP. HUNTER: You've got more
24 lawyers working for everybody in this building
25 today. I know which groups are working for

1 who, and that's why everybody are going to law
2 firms. You are on the ones you want to
3 challenge, yes, you are because I know the
4 groups that are doing it; and you've done it
5 historically.

6 There is nothing wrong with any
7 member, any group, to go to a law firm and get
8 a bill prepared; and that is done regularly by
9 Democrats, Republicans, and anybody else.

10 So do I know who was the
11 specific person in the law firm --

12 REP. MANUEL: Yes, sir.

13 REP. HUNTER: -- who drew it?

14 No. Do I believe that it was a group inside a
15 law firm with probably some consultants?

16 Absolutely.

17 REP. MANUEL: Okay. Completely
18 understand that and everything else you said.

19 I guess -- and, please, again,
20 forgive my naivete if I'm not as intelligent, I
21 guess, as I should be --

22 REP. HUNTER: But you're the
23 sharpest dresser in the room.

24 (Laughter.)

25 REP. HUNTER: That's what you

1 CHAIRPERSON VASUT: Yeah,
2 absolutely, one question.

3 Repetitive Turner recognized to
4 question the author.

5 REP. TURNER: Thank you,
6 Mr. Chairman.

7 Chairman Hunter, you had said
8 in response to Dean Thompson that Adam Kincaid
9 was not involved. I want to make sure I
10 understood your question clearly. Was that
11 your statement, that Adam Kincaid was not
12 involved with the drawing of this--

13 REP. HUNTER: Todd Hunter has no
14 knowledge of Adam Kincaid involved in this.

15 REP. TURNER: Because, the
16 reason I ask is in the Senate hearing earlier
17 this week, Chairman Phil King said clearly on
18 the record, "Unequivocally, Adam Kincaid is
19 drawing a map."

20 REP. Hunter: And just so you
21 know, sir, the first time I talked to Phil King
22 was yesterday; and he was just asking a
23 procedural. So I haven't even talked to him
24 prior to yesterday; and if the individual Adam
25 Kincaid was involved on this side, I have no

1 knowledge, absolutely none.

2 REP. TURNER: So you have no
3 knowledge. Is it possible then, that, as you
4 were working with Butler Snow, that Adam
5 Kincaid actually sent the map to Butler Snow to
6 give to you? Is that what happened?

7 REP. HUNTER: I have no idea on
8 that. I do not know.

9 REP. TURNER: Okay. So you
10 didn't ask Butler Snow where they got the map?

11 REP. HUNTER: No. No, I've sat
12 down them with data, like I've done in the
13 past.

14 REP. TURNER: I'm sorry. Say
15 that again.

16 REP. HUNTER: I've sat down them
17 with data, like I've done in the past, and gone
18 into that. I generally do not go into the
19 specific -- [SEVERAL SECONDS OF BLANK VIDEO.]

20 CHAIRPERSON VASUT: Here for our
21 court reporter. What I'd like to do is stand
22 at ease for five minutes, and then you take a
23 little break.

24 Dean Thompson wanted me to
25 remind all of you to hydrate.

TRANSCRIPTION OF VIDEOTAPE
TEXAS HOUSE OF REPRESENTATIVES
COMMITTEE ON CONGRESSIONAL REDISTRICTING
Friday, August 1, 2025

**Defendants'
Exhibits**

1289

1 legislature has said, "Oh, well, we'll add
2 these minorities over here," well, again, when
3 you start shifting people around, they found,
4 historically -- I want to say it was the 20 --
5 around the 2010 redistricting, that what Texas
6 did is they decided to add basically low-
7 propensity Latinos in one of the districts so
8 that, again, that district would not be Latinos
9 being able to elect their representation
10 because they took people that they knew had a
11 low propensity to show up.

12 REP. PIERSON: And so on that
13 note, with these new lines, political
14 performance was taken into consideration.

15 JASMINE CROCKETT: That is what
16 we've heard from the bill author, yes.

17 REP. PIERSON: And in previous
18 hearings, I mentioned specifically that in the
19 state of Texas President Trump did win the
20 majority of the Hispanic voters in the state;
21 and, just to broaden that even further -- I
22 mean, those are the numbers. President Trump
23 did win the majority of the Hispanic votes in
24 the state; in fact, he flipped, I believe it
25 was, ten counties in the state.

1 So don't you think that is
2 reflective of this map, this proposed map, that
3 the minorities who are here with the new
4 majority minority districts that have been
5 created, it is reflective?

6 JASMINE CROCKETT: No,
7 Representative, I don't.

8 REP. PIERSON: Okay.

9 JASMINE CROCKETT: Again, it's
10 just based upon -- I mean, this is just pure
11 math. Like, I'm not trying to pick who is
12 going to vote for who because, as it was stated
13 earlier, the idea that anybody is a monolith is
14 wild, anyway, right --

15 REP. PIERSON: Right.

16 JASMINE CROCKETT: -- because,
17 first of all, Latinos down at the border, they
18 are not the same as Latinos, say, in the DFW or
19 in Harris County. So I don't want to pretend
20 as if any minority group is a monolith, which
21 is one of the reasons that we talk about
22 communities of common interests, because we
23 work together and we function together and we
24 do things a little differently.

25 I mean, I'm sure there are even

1 Chair recognizes, Representative
2 Pierson to question the bill author.

3 REP. PIERSON: Thank you,
4 Chairman.

5 Chairman Hunter, it has been a
6 long night. So, I -- I am going to try to just
7 be brief. We've heard a lot of testimony,
8 particularly philosophy, opinions, and a lot of
9 projections. So, I just wanna run through a
10 few of the facts on this proposed map with you.

11 Chairman, this plan creates two
12 new Black CVAP districts, District 18 and
13 District 30. Is that correct?

14 REP. HUNTER: Yes.

15 REP. PIERSON: And in both 18
16 and 30, they perform solidly for Democrats. Is
17 that correct?

18 REP. HUNTER: It's my
19 understanding you're correct.

20 REP. PIERSON: Okay. The plan
21 also creates two new Hispanic CVAP districts,
22 that would be District 9 and 35. Is that
23 correct?

24 REP. HUNTER: Those are HCVAPs.
25 Yes --

1 they didn't use your terminology. Your
2 terminology is not, to me, the same thing he
3 was saying. You're trying to -- to use the
4 word "coalition districts" and all that. We
5 talked about specific districts.

6 REP. TURNER: Okay. It was an
7 HVAP.

8 REP. HUNTER: It was -- so,
9 let's talk about specific districts. All
10 right.

11 REP. TURNER: All right. So,
12 for example, CD 18 was purposely altered so to
13 be a Black CVAP majority district rather than a
14 38.8 percent Black CVAP district, right?

15 REP. HUNTER: CD 18 was drawn to
16 be a 50.81 percent CVAP, which is 11.82 change
17 plus.

18 REP. TURNER: Okay. So, that
19 was -- that was the purpose of that change?

20 REP. HUNTER: I don't know if
21 that's the only purpose, but that's the effect.

22 REP. TURNER: Okay. And -- and
23 similarly, the proposed CD 35 was purposely
24 changed to increase its Hispanic CVAP to be
25 above 50 percent, correct? Yeah. I think

1 that's one of the ones you alluded to.

2 REP. HUNTER: 51.57 percent.

3 REP. TURNER: Uh-huh.

4 REP. HUNTER: And it also has
5 political performance involved --

6 REP. TURNER: Right.

7 REP. HUNTER: -- in all of this.

8 REP. TURNER: But it -- but the
9 Hispanic CVAP did -- did increase to over 50
10 percent?

11 REP. HUNTER: 51.57.

12 REP. TURNER: All right. And
13 so, then in the CD 30, the Black CVAP was also
14 purposely increased to be over 50 percent,
15 correct?

16 REP. HUNTER: CD 30, the HCVAP
17 is --

18 REP. TURNER: That just...

19 REP. HUNTER: -- 24...

20 REP. TURNER: Black CVAP. Black
21 CVAP.

22 REP. HUNTER: Oh, I'm sorry.
23 Well, let's just do both, just so everybody
24 knows. HCVAP was 24.93 percent. Black CVAP is
25 50.41 percent.

1 REP. TURNER: Right.

2 REP. HUNTER: And, in 2021, the
3 Black CVAP was 46 percent. And, in 2021, the
4 HCVAP was 24.4 percent. So, it went up in
5 both.

6 REP. TURNER: Okay. And CD 9
7 was likely purposely changed. So, likewise,
8 purposely changed. So, it'll be slightly above
9 50 percent Hispanic CVAP, instead of being a
10 coalition district. Is that right?

11 REP. HUNTER: Again, because of
12 Petteway. I'm hesitant to just generally use
13 the words "coalition district" since we just
14 talked about how we use Petteway and our
15 Supreme Court case. But --

16 REP. TURNER: But that's the
17 whole reason we're here.

18 REP. HUNTER: -- the proposed
19 Hispanic...

20 REP. TURNER: Well, the DOJ said
21 that we gotta go dismantle the coalition
22 district.

23 REP. HUNTER: Mr. Turner, you
24 and I have already talked. You keep saying,
25 "we're here because of DOJ." I'm not saying

1 constitutional concerns because they alleged
2 that there are coalition districts that were
3 drawn according to race, despite...

4 REP. HUNTER: That's what the
5 DOJ put in the letter?

6 REP. TURNER: Yes.

7 REP. HUNTER: Great.

8 REP. TURNER: And I'm -- and
9 I'm...

10 REP. HUNTER: But what does
11 the...

12 REP. TURNER: And I'm sure
13 you've read the letter, Mr. Hunter.

14 REP. HUNTER: No. You and I
15 don't agree. You're trying to tie it, and I'm
16 saying, "that's general." I'm not going to tie
17 the Governor to your question. We don't agree.

18 REP. TURNER: All right.

19 REP. HUNTER: It is exactly --
20 the Democrats are looking one way and the
21 Republicans are shaking their head the other
22 way. That's why we disagree on this Bill.

23 REP. TURNER: All right. Well,
24 I'm going to go back to my -- my question. So
25 -- so just to -- just to -- we -- we got a

1 little off track, but with CD 9 is to -- just
2 to close the loop on that. It was also
3 purposely changed so that the Hispanic CVAP
4 would be over 50 percent now.

5 REP. HUNTER: 50.41 percent.

6 Correct.

7 REP. TURNER: All right. Thank
8 you.

9 So, is there any evidence or
10 analysis, that under the curve map -- because
11 you -- because you've really leaned into this
12 argument of "we've increased the HCVAP in these
13 districts and we've increased the Black CVAP in
14 these two districts," and that that's a -- a
15 good thing about this map, based on what I
16 heard of your explanation earlier today in your
17 conversation with Mr. Wilson just now.

18 Is there any evidence or
19 analysis that shows, under the current map,
20 that Black voters in CD 18 or CD 30 are unable
21 to elect the candidate of their choice under
22 --under the current map.

23 REP. HUNTER: You're -- and the
24 question was what?

25 REP. TURNER: Is there any

1 evidence or data you have that would suggest
2 that Black voters in CD 18 or CD 30 are unable
3 to elect the candidate of their choice --

4 REP. HUNTER: I -- I don't have
5 any evidence.

6 REP. TURNER: -- in current
7 configuration?

8 REP. HUNTER: I don't have --
9 you said, "do I have evidence?" I don't. I
10 don't have any evidence.

11 REP. TURNER: Okay. All right.
12 Similarly, is there any evidence, or data, that
13 shows the Latino voters in the existing CD 35
14 are unable to elect the candidates of their
15 choice?

16 REP. HUNTER: As I told you, I
17 don't have any data or any evidence. But to
18 me, at the very beginning, even though we talk
19 about HVAP and even though we talk about BVAP,
20 and even though we have created five new
21 districts -- yes, political performances isn't
22 all in them -- but also, I believe anybody can
23 win these districts, and I've said that from
24 the beginning.

25 It's not a guarantee for

1 anybody, and that's where I think we all have a
2 disagreement among folks here.

3 REP. TURNER: Yeah. Has -- has
4 Butler Snow conducted a racially polarized
5 voting analysis within the new CD 9 to
6 ascertain who the candidates of choice are
7 between Hispanic voter -- with Hispanic voters
8 and also with Anglo voters?

9 REP. HUNTER: I don't know.

10 REP. TURNER: You don't know.
11 Okay. So, we learned in the El Paso federal
12 redistricting trial, or -- or in at least in
13 discovery to depositions leading up to the
14 trial -- that the Attorney General's office,
15 said they create a software program back in
16 2021 to do their own racially polarized voting
17 analysis of any redistricting plans, and that
18 all the plans offered in 2021 were run through
19 that software, including the plans you
20 authored.

21 So, have -- has the Attorney
22 General's office analyzed this plan with that
23 software for racially polarized voting
24 analysis.

25 REP. HUNTER: I do not know if

1 they have.

2 REP. TURNER: You haven't asked
3 them to?

4 REP. HUNTER: No. I haven't
5 asked anybody on that.

6 REP. TURNER: Okay. What's the
7 basis and evidence for purposely changing the
8 racial makeup of districts to change them so
9 that a single racial group constitutes the
10 majority of the district's population?

11 REP. HUNTER: I -- I don't
12 understand your question.

13 REP. TURNER: Well, okay. And
14 you -- you -- you mentioned this in your
15 layout, this morning, that there's going to be
16 now eight districts with majority Hispanic
17 CVAP, two districts with --

18 REP. HUNTER: Okay. Got it.

19 REP. TURNER: -- a majority
20 Black CVAP. You just discussed that --

21 REP. HUNTER: Yes. We just did
22 that.

23 REP. TURNER: -- with Mr.
24 Wilson. So, what is the basis and evidence for
25 purposefully doing that?

TRANSCRIPTION OF VIDEOTAPE

SENATE SPECIAL COMMITTEE ON REDISTRICTING

Sunday, August 17, 2025

**Defendants'
Exhibits**

1314

1 SENATOR MILES: -- Mr. Chairman. Chairman King, you're
2 going to stand by your statement that race was not a factor for
3 you in the map that you filed, that you did not draw, that you
4 filed that was drawn as you admittedly said by the National
5 Republican Redistricting Committee? You're going to stand by
6 that?

7 CHAIRMAN KING: Yes, and the reason I do because I know
8 that -- and I guess maybe you think there are not, but I think
9 there are large numbers of Hispanic and Black Republicans. I
10 think there's large numbers of Asian Republicans.

11 I haven't looked at the numbers, but I believe in the
12 policies. Now you -- there's been a lot of media estimates that
13 you probably read articles too suggesting that the map may elect
14 more Hispanics or Republicans.

15 I don't know. All I care about is I believe that there
16 will be more Republican leaning districts after this map becomes
17 the Texas map.

18 SENATOR MILES: Thank you, Mr. Chairman.

19 VICE CHAIR CREIGHTON: Thank you, Senator Miles.
20 Members, appreciate your commentary and questions. At this time,
21 we'll call for a vote on Senate Bill Four. Senator Parker moves
22 that Senate Bill Four be reported favorably to the full Senate
23 with the recommendation that it do pass and be ordered not
24 printed. The Clerk will call the roll.

25 THE CLERK: Senator Alvarado.

TRANSCRIPTION OF VIDEOTAPE

HOUSE SELECT COMMITTEE ON CONGRESSIONAL REDISTRICTING

RE: HB 4

MONDAY, AUGUST 18, 2025



1 tell me the changes you made in CD-9?

2 REPRESENTATIVE HUNTER: CD-9, the -- we increased
3 in the CD-9 area, the particular detail and the lines, it
4 includes now all of Liberty County.

5 And we made sure that that particular
6 congressional district has an increase to almost 60 percent
7 Republican.

8 REPRESENTATIVE THOMPSON: May I ask you an
9 additional question, please?

10 CHAIRMAN VASUT: Yes.

11 REPRESENTATIVE THOMPSON: So you -- when you move
12 to include all the Liberty County, you eliminated what part?
13 Because you moved it eastwardly.

14 REPRESENTATIVE HUNTER: Well, all I can --

15 REPRESENTATIVE THOMPSON: -- if you --

16 REPRESENTATIVE HUNTER: -- show you is if you take
17 nine, all of Liberty is in it. And you can pull up your
18 district viewer and it will show you where the lines now are
19 with nine in the other county.

20 REPRESENTATIVE THOMPSON: On -- let me ask you a
21 question on 18. What did you say you did in 18?

22 REPRESENTATIVE HUNTER: In 18, it remains a
23 majority/minority Black CVAP. The compactness stays the
24 same overall.

25 CD-18 decreases Black CVAP slightly from

TRANSCRIPTION OF VIDEOTAPE
EIGHTY-NINTH LEGISLATURE
SECOND CALLED SESSION
Wednesday, August 20, 2025



1 there's no guarantee of an electorate success,
2 Republicans will now have an opportunity to potentially
3 win these districts. The five new districts we have, CD
4 9, 50.15 percent what we call Hispanic citizen voting
5 age population. That's HCVAP.

6 CD 28, which is approximately 86.72
7 percent, HCVAP. CD 32 remains a nonminority district.

8 CD 34, 71.93 percent, HCVAP. CD 35,
9 51.57 percent, HCVAP.

10 This also improves political performance
11 for Republicans in District CD 2, 8, 9, 17, 22, 38.

12 Some data points in comparison to 2021:
13 In 2021, there were nine Hispanic majority age
14 districts. In this plan, there are 10 Hispanic majority
15 age districts.

16 In the 2021 plan, there were seven
17 Hispanic citizen voting age districts, and under this
18 plan, there are eight. There are no Black CVAP
19 districts under the 2021 plan. In the proposed plan,
20 there are two majority Black CVAP districts.

21 CD 18, 50.71 percent, Black CVAP,
22 compared to 38.99 percent in 2021.

23 CD 30, 50.41 percent, Black CVAP. 46
24 percent in 2021.

25 In the Harris County/Houston area, there

1 gentleman yield?

2 THE SPEAKER: Does the gentleman yield
3 for questions?

4 REP. HUNTER: Yes.

5 THE SPEAKER: Gentleman yields for
6 questions.

7 REP. THOMPSON: Mr. Chairman, who
8 decided that these should be changes made from the
9 introduction version of this Bill?

10 REP. HUNTER: Who decided the plan?

11 REP. THOMPSON: Who decided that there
12 should be changes made from the introduction version of
13 the Bill?

14 REP. HUNTER: I do not know who decided,
15 but it had been discussed since April that congressional
16 redistricting could be an issue, especially with the new
17 case law and the new population trends, and I made the
18 decision that I would file this Bill.

19 REP. THOMPSON: Mr. Chairman, when the
20 first called session, special session, the committee
21 produced a Bill that -- where they had indicated there
22 would be five new congressional districts, for
23 Republicans.

24 Subsequently thereto, a special -- a
25 second special session was called. Upon meeting, of the

1 REP. THOMPSON: Well, the substitute.

2 REP. HUNTER: Okay.

3 REP. THOMPSON: Yeah.

4 REP. HUNTER: Yes.

5 REP. THOMPSON: And I think the number
6 was 2333?

7 REP. HUNTER: I think that's the map
8 number, it is Plan C2333.

9 REP. THOMPSON: Yeah. That's the one we
10 all -- that's what I'm talking about. And you indicated
11 today that you all reconfigured that to be a Hispanic
12 majority district, correct?

13 REP. HUNTER: We said that Hispanic
14 CVAP, under the committee substitute, would be 50.15
15 percent.

16 REP. THOMPSON: And you have said in
17 your brief that the Latino population in Texas support
18 Republicans.

19 REP. HUNTER: That I said that...?

20 REP. THOMPSON: In your brief.

21 REP. HUNTER: In my brief?

22 REP. THOMPSON: Then you -- then you
23 said it -- I heard you say that the Latinos seem to tend
24 to support Republicans?

25 REP. HUNTER: Well, not me, but I

1 certainly welcome all of them, being a South Texan, and
2 I do think political performance and trend is going that
3 direction, to support Republicans. Absolutely.

4 REP. THOMPSON: Well...

5 REP. HUNTER: But I don't know what you
6 mean. I -- I don't think I said somebody preferred.

7 I think there is a political performance
8 that's showing preference to certain Republicans in
9 different regions of the State based on everybody.

10 REP. THOMPSON: And are you talking
11 about the racial polarization analysis?

12 REP. HUNTER: Well, I don't know what
13 you mean by "racial polarization analysis." I know
14 about data that was done by HCVAP, HVAP, Black CVAP,
15 Black VAP which is a little bit different. That's what
16 I'm relying on.

17 REP. THOMPSON: Well, this is -- this is
18 a dowser that that is normally utilized when they're
19 drawing to see what is the performance of different
20 races. They are looking at dilution and inclusions and
21 things of this nature. And they show that in CD 9, the
22 person that you pull in have more of a tendency to vote
23 democratic than republican.

24 And pulling in that percentage of
25 Latinos in Congressional District 9, and new

1 confederated District 9, it will show that if they are a
2 part of that congressional district, that their voting
3 power may be diluted. Are you aware of that?

4 REP. HUNTER: I'm not real clear on
5 that. Are you -- I don't think there's a dilution.
6 Political performance is what this.

7 CD 9, the Hispanic CVAP, is 50.15
8 percent. It's a new Hispanic CVAP. Liberty County is
9 now in CD 9. There does show, in this CD, Republican
10 partisan performance.

11 Previously, though, CD 9 was not a
12 majority of a single group. So, now, they are.

13 THE SPEAKER: (Strikes gavel). The
14 gentleman's time has expired.

15 REP. THOMPSON: Mr. Speaker.

16 THE SPEAKER: Ms. Thompson, for what
17 purpose?

18 REP. THOMPSON: I move that the time be
19 extended.

20 THE SPEAKER: Members, you heard the
21 motion. Is there objection? Chair, hears none, so...

22 (Indicating.)

23 THE SPEAKER: There is objection.
24 Members, that will require a record vote. Clerk, ring
25 the bells.

1 polarized voting?

2 REP. HUNTER: Do I have personal
3 knowledge? The answer is "no." Do I believe that they
4 every box, checked every law? The answer is "yes." I
5 have huge respect for the lawyers.

6 REP. ROMERO: Mr. Chairman, does the
7 Federal Voting Rights Act require the creation of any
8 Latino majority congressional district in Texas?

9 REP. HUNTER: I do know that when you
10 talk about coalition districts, which...

11 REP. ROMERO: That's not my question,
12 Mr. Chairman, with all due respect.

13 REP. HUNTER: Yes. It is. Disrespect.
14 You're not letting me answer. I don't agree with your
15 question. You set a mandate on Hispanic. That does
16 impact coalition districts. It does impact the issue of
17 majority/majority. And the 5th Circuit in Petteway says
18 you're wrong.

19 Now, number two, is there a specific
20 requirement? Four out of the five brand new
21 congressional are Hispanic? Four of the five are
22 Hispanic majority.

23 REP. ROMERO: Mr. Chairman, does the
24 voting...

25 REP. HUNTER: But if there is a

1 REP. HUNTER: That is correct --

2 REP. SPILLER: All right.

3 REP. HUNTER: -- in 2020.

4 REP. SPILLER: And then, in fact, that
5 -- that law that was in place when these districts, when
6 these districts were created under 21, was the Campos v.
7 City of Baytown case, which is a 37 year-old case, but
8 it was the law -- not necessarily throughout the
9 country -- but it was the law in the State of Texas
10 because it was the law in the 5th Circuit. That was the
11 precedent. Is that correct?

12 REP. HUNTER: In Petteway, they
13 referenced it, and that's what they said.

14 REP. SPILLER: Okay. So, now, in Texas,
15 one of the reasons that we're doing this now is that, we
16 feel compelled to because of the Petteway case and the
17 ruling in the Petteway case as it related -- as it
18 relates to these coalition districts, correct?

19 REP. HUNTER: Well, I think it's a
20 combination, Mr. Spiller. I think you have a U.S.
21 Supreme Court, Rucho. You have a 5th Circuit, Petteway.
22 The combination of both of those cases are involved in
23 this map.

24 REP. SPILLER: Right. And you mentioned
25 also in the Rucho case that -- that is a U.S. Supreme

1 what you've done generally with HB 4, but specifically
2 in Harris County as well, dealt with that issue of
3 compactness. Can you touch on that?

4 REP. HUNTER: Yes. You know, even
5 though public hearings may have opposition or support,
6 we heard from public in those hearings about the
7 compactness issues. And one of the issues was the
8 Austin to San Antonio District and why they felt that
9 should be looked at. Same thing in Houston. They
10 looked at 18 to the original, rather than how it has
11 spread out over the years. So, yes, compactness has
12 been involved.

13 REP. SPILLER: Okay. And also in,
14 relative to Harris County, we talked about District 9,
15 which was also -- second one in Harris County -- a
16 coalition district and the district that was addressed
17 in the Petteway case.

18 And now, under your HB 4, it changed
19 from a coalition district to a majority Hispanic CVAP
20 district. Is that correct?

21 REP. HUNTER: Yes. For the record, the
22 Hispanic CVAP of Congressional District 9 under this
23 plan, the Hispanic CVAP is 50.15 percent. In 2021, it
24 was 25.73 percent.

25 REP. SPILLER: All right. And I'm

1 Section 2 violations." And it also says there's not a
2 requirement that you have to use coalition.

3 So, what's happened since 2021, you have
4 maps that people ran that were using old terminology,
5 old law, and now you have a brand new set of law that
6 came in.

7 And, as Mr. Spiller said, it overturned
8 the Campos case, which basically was the law being used.
9 So, today, this map is taking those in factor.

10 REP. GARVIN HAWKINS: So, you don't
11 believe, or do you believe, that this redistricting plan
12 eliminates any minority opportunity districts? Does
13 this plan do that?

14 REP. HUNTER: No. I think we created
15 four out of five new seats of Hispanic majority. I
16 would say that's great. That doesn't ensure that a
17 political party wins them, but the Hispanic -- four out
18 of five Hispanic majority out of those new districts --
19 that's a pretty strong message, and it's good.

20 REP. GARVIN HAWKINS: Representative,
21 would you answer my question? Was there any --

22 REP. HUNTER: I thought I did.

23 REP. GARVIN HAWKINS: It's "yes" or
24 "no," right?

25 REP. HUNTER: What is "yes" or "no?"

1 REP. REYNOLDS: Okay. And based on your
2 new map in the paring in the Congressman Al Green's
3 address, he would now be in the 18th Congressional
4 District, correct?

5 REP. HUNTER: According to what was said
6 in the hearing.

7 REP. REYNOLDS: According to his
8 testimony, correct?

9 REP. HUNTER: Yeah.

10 REP. REYNOLDS: Okay. So, wouldn't you
11 agree then that, basically, it would be a collision
12 course with congressman Al Green and the congressman of
13 the 18th Congressional District?

14 REP. HUNTER: Well, I don't know about
15 collision courses, and both individuals, I knew and know
16 for a long time.

17 But what I'm telling you, we have five
18 new congressions --

19 REP. REYNOLDS: How many new?

20 REP. HUNTER: -- four are Hispanic
21 performing districts.

22 REP. REYNOLDS: That's not the question.

23 REP. HUNTER: And you...

24 REP. REYNOLDS: That's not the question.

25 REP. HUNTER: You haven't let me finish.

1 REP. REYNOLDS: You go ahead and finish.

2 REP. HUNTER: And they are based on the
3 U.S. Supreme Court political performing. And so, I am
4 adopting this map. I think this is the map we should do
5 that I proposed --

6 REP. REYNOLDS: No.

7 REP. HUNTER: -- and it's the right
8 thing --

9 REP. REYNOLDS: I understand your
10 position.

11 REP. HUNTER: -- and it's been adopted by
12 all law.

13 REP. REYNOLDS: I understand your
14 position, but --

15 REP. HUNTER: Good.

16 REP. REYNOLDS: -- you know, you
17 understand the way this process works. At the backbite,
18 I get a chance to ask the questions, and you get a
19 chance to answer them.

20 REP. HUNTER: Well, no. You need to let
21 me answer.

22 REP. REYNOLDS: I am letting you answer.

23 REP. HUNTER: You're breaking up...

24 (Voices overlapping.)

25 REP. REYNOLDS: But you're...

1 REP. HUNTER: ... and not letting me
2 talk. Yeah. Why don't you finish?

3 REP. REYNOLDS: It's only a
4 hypothetical.

5 REP. HUNTER: No. I haven't --

6 REP. REYNOLDS: Here's the question.

7 REP. HUNTER: -- finished.

8 REP. REYNOLDS: Here's the question
9 then: Based on this proposed map in House Bill 4, how
10 many African American opportunity districts are there in
11 Houston?

12 REP. HUNTER: In the Houston --

13 REP. REYNOLDS: Yes.

14 REP. HUNTER: -- area? On mine, or are
15 you talking about...

16 REP. REYNOLDS: Well, on yours.

17 REP. HUNTER: Which amendment are you...

18 REP. REYNOLDS: I'm talking about...

19 (Voices overlapping.)

20 REP. HUNTER: I thought we were talking
21 about the amendment.

22 REP. REYNOLDS: On your -- on your...

23 REP. HUNTER: So, now you're going back
24 to my Bill.

25 REP. REYNOLDS: So...

1 REP. HUNTER: All right. I'm going to
2 go ahead and answer your questions, even though you're
3 not staying on the amendment.

4 First of all, CD 18 now becomes a 50.8
5 percent Black CVAP. In 2021, you're advocating for a
6 38.8 percent CVAP. I think my map is much more
7 improving.

8 CD 30 is now a 50.2 percent Black CVAP.
9 In 2021, which you've been defending, it's only 46
10 percent. So, you have two that are majority Black CVAP
11 districts in Texas.

12 REP. REYNOLDS: As opposed to four,
13 correct?

14 REP. HUNTER: I don't know where you're
15 coming up with...

16 REP. REYNOLDS: Well, currently, we have
17 four. You have -- you have CD 9, CD 18, CD 30, and CD
18 33, and now you have two, based on your map. You -- you
19 reduced it by 50 percent?

20 REP. HUNTER: CD 9 becomes a majority
21 Hispanic district.

22 REP. REYNOLDS: Correct. I said...

23 (Voices overlapping.)

24 REP. HUNTER: So, you oppose that?

25 REP. REYNOLDS: No. No.

1 Another fact, in 2024, Democrats lost.
2 President Trump won big. So, you're upset, and I get
3 it. You're losing at the ballot box, but you will not
4 silence the majority in the State of Texas. You can
5 throw your tantrum, you can leave, you can run, and you
6 can ignore the will of the rest of the voters, but it's
7 honestly time to pick a new narrative.

8 The racist rhetoric is old. It is
9 seriously stale and long overplayed. Newsflash:
10 Democrats do not own minorities in Texas. The South
11 lost. There are Black and Hispanic and Asian
12 Republicans right here in this chamber who were all
13 elected, just like you. Republicans are the majority.

14 So, it's not the people of Texas who are
15 racist, it is you. All of these speeches on
16 victimization and this toxic white guilt that I've had
17 to suffer through my entire life, I'm sick of it. The
18 people of Texas have spoken. We have the majority.
19 President Trump flipped 11 out of 18 counties on the
20 Texas-Mexico border. The people of Texas are sick of
21 the rhetoric as well.

22 He doubled his support from 2020. So,
23 political performance is the driver. You lost. Get
24 over it. I urge my colleagues to vote in favor of HB 4.
25 Removing gerrymandering is the right thing to do.

1 Increasing minority representation is the right thing to
2 do, and it more accurately reflects the values of
3 Texans. This is long overdue, and we owe it to the
4 people of Texas. Thank you, Mr. Speaker.

5 (Applause.)

6 THE SPEAKER: Chair recognizes
7 Mr. Jones.

8 REP. JONES: Thank you, Mr. Speaker.
9 Members, I stand in opposition of HB 4. I have written
10 remarks, but these remarks come straight from my heart.
11 The question I want to ask, as we prepare for a final
12 vote on this Bill is that: Is it worth it? Is it worth
13 it to once again ignore the will of countless Texans
14 saying, "no." "We don't want this."

15 "Let's focus on flood relief." "Let's
16 increase access to health care." "Let's provide funding
17 for our public schools."

18 There are still bodies being recovered
19 from the flooding, but we are here focusing on maps, not
20 flood relief, not returning the bodies to loved ones,
21 but racist maps, not Texans.

22 During the first called special session,
23 we had two weeks to focus on providing flood relief in
24 which we had no bills on the floor regarding this topic.
25 Not until Democrats broke quorum did a Bill magically

TRANSCRIPTION OF AUDIO

SENATE CHAMBERS

Friday, August 22, 2025 (PART I)



1 you have as well, and we have an ongoing trial in El Paso and
2 it's just a complex, very robust area of law.

3 SENATOR MENENDEZ: Would any of those be the
4 Voting Rights Act?

5 SENATOR KING: Voting Rights Act is always a
6 consideration.

7 SENATOR MENENDEZ: Very good. Does it concern you
8 then that Chairman Hunter has focused so closely on the race
9 data in his discussions of this very bill, House Bill 4?

10 SENATOR KING: I am only concerned with what's
11 before the Senate and in my authorship of or sponsorship of
12 the bill.

13 SENATOR MENENDEZ: So, knowing that the Voting
14 Rights Act can be in your terms, your words, problematic, why
15 does it not concern you that Chairman Hunter has been
16 bringing up race when he's describing these districts?

17 SENATOR KING: I'm not aware whether he has or
18 not, but from my perspective, why would I use racial data?
19 Voting history is just much more accurate and is well
20 established as a legal way to draw maps, a legal process upon
21 which to base maps.

22 SENATOR MENENDEZ: Okay. So, you mentioned that
23 you didn't draw this map or these maps. Is that correct?

24 SENATOR KING: That's correct.

25 SENATOR MENENDEZ: Okay. So, then, whoever drew

1 these maps, do we know if they used any racial shading on the
2 computer at any point? Do you -- are you aware of that?

3 SENATOR KING: So, again, I don't know. I don't
4 have any personal knowledge as to who drew the changes
5 between HB 4 as it was entered as it was introduced in this special
6 session, and HB 4 as it was passed out of the House because
7 there were some changes.

8 SENATOR MENENDEZ: Correct. And I guess what I'm
9 trying to find out is what analysis was made during the map
10 drawing process to determine voter preferences, as you've
11 mentioned, the -- you've mentioned the partisan preferences,
12 but also by racial group. That's what I'm trying to figure
13 out what analysis was made.

14 SENATOR KING: All I can tell you is that I very
15 specifically ask our legal counsel to run Gingles and the
16 other analyses that are used to determine if a map complies
17 with the VRA constitutional and other requirements, and I
18 have been well assured that this map complies with the VRA in
19 all respects as well as all other applicable law.

20 SENATOR MENENDEZ: So, I appreciate that. So,
21 you're telling me that the legal counsel that did know who
22 drew these maps, that you asked them to run an analysis
23 through the Voter Rights Act, through Gingles, and tell me
24 that they're legal. Did they tell you which districts race
25 was taken into account to make sure that they're legal?

1 District 35 in this new map are to be Hispanic majority
2 districts. Is that your understanding?

3 SENATOR KING: I have no personal knowledge of
4 that.

5 SENATOR ZAFFIRINI: Thank you. And you have said
6 it is your belief that the Hispanic population in Texas
7 supports Republicans. Is that correct?

8 SENATOR KING: I think that -- I'm sorry. I'm not
9 sure how you're phrasing that. Are you asking me if do I
10 believe that Hispanic citizens will vote for the --

11 SENATOR ZAFFIRINI: That you have said --

12 SENATOR KING: -- Republicans? Yes, I do.

13 SENATOR ZAFFIRINI: That you've said that. Yes.
14 Thank you. Are you aware that data scientists can calculate
15 the preferred candidates for racial groups in precise areas
16 and this is called a racially polarized voting or RPV
17 analysis?

18 SENATOR KING: I'm generally familiar with that
19 concept.

20 SENATOR ZAFFIRINI: Thank you. You said in
21 committee that you were unaware if anyone had performed a
22 racial polarization analysis of your map. Is that correct?

23 SENATOR KING: That is correct.

24 SENATOR ZAFFIRINI: Do you know if the map drawers
25 were provided the reams of RPV analysis offered in the El

1 SENATOR ZAFFIRINI: Have the map drawers or anyone
2 else, as far as you know, done an RPV analysis of any mapping
3 proposal filed during these two special sessions? Not during
4 the trial, but during these two special sessions.

5 SENATOR KING: Has my legal counsel?

6 SENATOR ZAFFIRINI: No. Have the map drawers or
7 anyone else including your legal counsel done an RPV analysis
8 of the mapping proposal?

9 SENATOR KING: I don't have any personal knowledge
10 of that.

11 SENATOR ZAFFIRINI: Thank you. Are you aware that
12 a majority of the Hispanic population that your map includes
13 in CD 9 and CD 35 prefers Democrats in elections?

14 SENATOR KING: Again, I haven't looked at any
15 racial data, but I can tell you the way the districts are
16 drawn specifically CD 9. It should perform competitively for
17 Republicans.

18 SENATOR ZAFFIRINI: Thank you. Have you seen the
19 data analysis performed by some data scientists at UCLA on
20 your map? My staff provided yours with a copy of it.

21 SENATOR KING: No, I haven't.

22 SENATOR ZAFFIRINI: Thank you. For example, in
23 your new CD 9, 61.99 percent of the Hispanic population voted
24 for Harris for president. Were you aware of that?

25 SENATOR KING: No.

1 taken into consideration.

2 SENATOR HINOJOSA: There are three white Democrats
3 in Texas congressional delegation and 10 minority Democrats.
4 Yet, four out of the five incumbents targeted for elimination
5 in this map, House Bill 4, are minorities. Why does this map
6 only seek to eliminate seats held by minority Democrat
7 members?

8 SENATOR KING: Again, I haven't looked at any
9 racial data. I have no idea who might run for office as a
10 candidate, and I have no idea who may be elected. These are
11 in fact -- frankly, these are going to be very competitive.
12 These five districts are going to be very competitive.

13 SENATOR HINOJOSA: So, do you think -- well, did
14 you -- you said you didn't draw the map, correct?

15 SENATOR KING: That's correct. I did not
16 physically draw the map.

17 SENATOR HINOJOSA: So, you just pick up a map,
18 draw it -- from somebody.

19 SENATOR KING: The map was drawn by somebody.
20 That's correct.

21 SENATOR HINOJOSA: And that somebody could have
22 taken racial data into consideration in drawing House Bill 4.

23 SENATOR KING: All I can tell you is that I don't
24 really have any personal knowledge of the inner workings that
25 went into who participated in drawing the maps. I mean, I

1 map?

2 SENATOR KING: I'm assuming it was a product of
3 the House author and their counsel.

4 SENATOR COOK: But you haven't actually had a
5 conversation with him about that, or you have?

6 SENATOR KING: I haven't talked to him about that.

7 SENATOR COOK: Okay. So -- yeah. So, you can't
8 name people who like gave instructions for crafting
9 boundaries or any lines specifically?

10 SENATOR KING: No.

11 SENATOR COOK: Okay. So, when did you first see
12 this draft map?

13 SENATOR KING: I guess, it was Monday when it was
14 laid out in the House committee if I have my days right.

15 SENATOR COOK: But you saw it the same time
16 everybody else in committee saw it and it was when the
17 messenger handed it to you in committee?

18 SENATOR KING: Yes.

19 SENATOR COOK: Did you or anyone on your staff or
20 anything see it before then?

21 SENATOR KING: They saw it the same time I did.

22 SENATOR COOK: Then, how did your legal counsel
23 get it to scrub it?

24 SENATOR KING: We notified them to go online, take
25 it off the web, pull it down from the website and look at it.

1 SENATOR COOK: And how did you know what the
2 number was and all of that?

3 SENATOR KING: Well, actually, I want to correct
4 that. That's not correct. We found out about it because the
5 House Counsel called our counsel and said there's a new map
6 coming out and then they contacted my chief of staff and that
7 was Monday.

8 SENATOR COOK: Okay. So, House Counsel reaches
9 out to your counsel, says go pull the map and -- but you guys
10 never even knew what the map number was until it landed on
11 your desk in committee hearing?

12 SENATOR KING: No.

13 SENATOR COOK: Okay. Nobody that's paid by you?

14 SENATOR KING: No.

15 SENATOR COOK: Okay. It's kind of wild to me,
16 I'll be honest. I didn't know that's how it works. And I
17 think you've said multiple times, like, this is -- you're
18 trying -- you're establishing, right, the DOJ letter did not
19 impact you in any way?

20 SENATOR KING: No, none at all.

21 SENATOR COOK: Okay. And are you aware, like, had
22 your legal counsel seen the DOJ letter?

23 SENATOR KING: Yes.

24 SENATOR COOK: Have y'all had any conversations
25 about it or anything that --

TRANSCRIPTION OF AUDIO

SENATE CHAMBERS

Friday, August 22, 2025 (PART II)



1 barely Hispanic, just over the 50 percent mark. CD-18, a
2 coalition district in the current plan, in your opinion?

3 SENATOR KING: Again, to determine if something is
4 a coalition district, you have to look at racial data, and I
5 have not looked at racial data.

6 SENATOR GUTIERREZ: Is CD-22 a coalition district?

7 SENATOR KING: I would have to give the same
8 answer to that to any district you ask me about, of the 38.

9 SENATOR GUTIERREZ: So you didn't look at race, we
10 can go on and on and on, and you're going to say -- give me
11 the same answer that you didn't look at race as a
12 consideration or make any of these maps because you didn't
13 actually make the maps, correct?

14 SENATOR KING: That's correct.

15 SENATOR GUTIERREZ: Other people made the maps.

16 SENATOR KING: That is correct.

17 SENATOR GUTIERREZ: And you don't know whether
18 those people looked at race in creating these maps, do you?

19 SENATOR KING: What I -- No. All I can tell you
20 is -- and I haven't inquired as to who physically drew the
21 maps. I haven't inquired as to the process, who all was
22 involved in that. All I can tell you is that I am confident
23 that the map does not violate the VRA or any other applicable
24 law, and that it also will make at least five districts
25 perform better for a Republican candidate.

1 SENATOR GUTIERREZ: I'm going to try to keep my
2 temperature down at this level because I think it's
3 important, but I find it interesting that you keep going back
4 to this notion that you don't know. You were told, you know.
5 You didn't make the maps. You didn't call the people that
6 make the maps. They didn't communicate with you. You don't
7 know who they are. You never saw them. What kind of level
8 of preparedness is that on this very important matter?
9 You're supposed to believe some person that you don't even
10 know who made these?

11 SENATOR KING: As I've said before, House Bill 4
12 meets all legal criteria, and it will promote the election of
13 more Republican Congressional Members.

14 SENATOR GUTIERREZ: Okay. That's great, but
15 that's not what the United States Justice Department said.
16 They said that these race-based considerations from these
17 special districts were created, making them unconstitutional
18 coalition districts. So they had to, if you take the inverse
19 of this, they had to have used race in making their
20 assessments. They had to take race into consideration.
21 Correct? That's what they say in this letter.

22 SENATOR KING: As far as I know, they haven't
23 written any letter in regard to HB-4. If you're speaking of
24 the existing 2021 map, that letter states those conclusions,
25 but I have not seen, nor do I know of anyone who's seen, any

1 Kincaid? Tell us about what that conversation was like.

2 SENATOR KING: I've talked to Adam Kincaid three
3 times in the last probably couple of months --

4 SENATOR GUTIERREZ: The what? I don't mean to
5 interrupt. The last time I asked you this, you said you did
6 not speak to Adam Kincaid, so now you did.

7 SENATOR KING: No. No.

8 SENATOR GUTIERREZ: Yeah, you did.

9 SENATOR KING: No. No. No. No. We haven't talked
10 about this map in detail. What I -- I spoke to Adam Kincaid
11 when all the rumors first started. Again, I'm trying to
12 remember correctly, but as I recall - to the best of my
13 recollection -- the first time I talked to Adam Kincaid, and
14 I had known him years ago, is we'd spoken on a panel or two
15 together. When the media first started discussing
16 redistricting, I had called him and asked him if he was
17 involved in that process, and he said he was.

18 SENATOR GUTIERREZ: When was that conversation?

19 SENATOR KING: It was before this committee was
20 appointed.

21 SENATOR GUTIERREZ: Two months ago?

22 SENATOR KING: Yeah. Probably. Whenever it all
23 started first coming out on TV. Then -- and we were all
24 trying to figure out if there was going to be a special
25 session and all that, and if it was really for real something

1 going on.

2 SENATOR GUTIERREZ: Who is we? You and him?

3 SENATOR KING: Yeah. I just called him. I was
4 kind of surprised I had his mobile number, actually, but I
5 did. I ran into him at ALEC.

6 SENATOR GUTIERREZ: Time out. I apologize. You
7 have his mobile number. Do you guys text?

8 SENATOR KING: Not that I recall.

9 SENATOR GUTIERREZ: Okay. I was just asking.
10 Sorry, go ahead. So the second time you ran --

11 SENATOR KING: I ran into him at the ALEC Annual
12 Conference this summer.

13 SENATOR GUTIERREZ: How'd that go?

14 SENATOR KING: We visited a few minutes. I
15 specifically told him, "Don't tell me anything you're doing
16 with regard to map drawing. Don't tell me about the details
17 of any map if you're involved in it."

18 SENATOR GUTIERREZ: Okay. So, so, so you knew
19 that he was doing the map drawing.

20 SENATOR KING: Yes.

21 SENATOR GUTIERREZ: But earlier, you said you
22 didn't know the map drawers.

23 SENATOR KING: I knew that he was involved in the
24 redistricting process, and I called him that first time and
25 said, "Hey, are you involved in all of this? Is this for

1 real? That they're pushing for redistricting?" Something to
2 that effect.

3 He said, "Yeah. How are you doing? Haven't
4 talked to you in years. See you later.

5 SENATOR GUTIERREZ: All right.

6 SENATOR KING: Then we talked at ALEC, and we sat
7 down for a few minutes, and I specifically told him, "Don't
8 tell me anything about the maps you're drawing. I don't want
9 to discuss that."

10 SENATOR GUTIERREZ: I'll give you the benefit of
11 the doubt. Earlier, when you said you didn't know the map
12 drawers, that was just, you now remembered that you spoke --

13 SENATOR KING: Yeah.

14 SENATOR GUTIERREZ: Okay. So Adam is a map
15 drawer. Okay. We got that now.

16 SENATOR KING: Yeah. He's CEO or President or
17 something of the --

18 SENATOR GUTIERREZ: Republican Redistricting
19 Trust.

20 SENATOR KING: Yeah. You came up with the correct
21 name for it the other day, or Miles did -- National
22 Republican Redistricting Trust.

23 SENATOR GUTIERREZ: There you go.

24 SENATOR KING: It's been around a long time.

25 SENATOR GUTIERREZ: Third conversation, which one

1 whole, was an overriding requirement for creating a legal
2 map.

3 SENATOR ECKHARDT: What was the specific purpose
4 in creating a CD-35 with a Hispanic citizen voting age
5 population of 51.6 percent?

6 SENATOR KING: I haven't looked at that racial
7 data, so I can't answer that.

8 SENATOR ECKHARDT: Sure, you can. What was the
9 purpose of a Hispanic district at 51.6 percent?

10 SENATOR KING: I've already answered that.

11 SENATOR ECKHARDT: Is your answer that you don't
12 know?

13 SENATOR KING: Yes.

14 SENATOR ECKHARDT: So you don't know why the
15 population, the Hispanic population, in that district, which
16 is currently at higher than 51.6 percent, went down to 51.6?

17 SENATOR KING: No. I haven't looked at any racial
18 data.

19 SENATOR ECKHARDT: But your law firm and whoever
20 draw -- drew the map did, correct?

21 SENATOR KING: They did whatever was appropriate
22 to determine if the map complied with the VRA and other
23 applicable law.

24 SENATOR ECKHARDT: So your testimony is it would
25 not be appropriate for you to look at race, but it was

Transcript of
July 22, 2025 Fox 4
Steven Dial Interview with Greg Abbott



impose coalition districts while at the very same time ensuring that we will maximize the ability of Texans to be able to vote for the candidate of their choice.

Steven Dial

Republicans defended this map for years.

Gov. Greg Abbott

Sure. And as they rightly should have, because the map that was drawn was drawn before this recent court decision that said coalition districts were not required. And the map, I believe, as drawn, could be upheld. That said, we're no longer compelled to have coalition districts. And as a result, we can draw maps, not have coalition districts, and through that process, maximizing the ability of Texans to be able to vote for their candidate of choice. And listen, one thing about this also, and that is this is a national-based issue. Don't think that Texas is the only state that's doing this. Texas is the first in line because our primaries are earlier. Our filing deadline is a few months away here in December. There are other states that are Democrat states across the country where their election process begins much later who have been talking about doing this very same thing. So this is a national-based issue as well.

Steven Dial

You mentioned national. There's been criticism of you saying you're letting President Trump call the shots.

Gov. Greg Abbott

Listen, people are always going to lodge criticisms. I'm not worried about

Transcript of
August 6, 2025 Just the News
John Solomon Interview with Harmeet Dhillon



1 And this is too complex, too weird, and too inconsistent with equal
2 protection. And so we wrote to Texas telling them that even though that law
3 had been struck down a couple of years ago, their districts are now not in
4 compliance with the federal voting rights laws, and so they needed to take
5 action to fix them.

6 That is what triggered the Texas legislature and the Texas governor to
7 call the legislature into session to put new maps together, and that is what
8 caused all these Democrats to spitefully flee the jurisdiction to avoid there
9 being a quorum.
10

11 And so I think this is very interesting. You can see that from the
12 extreme reaction of certain people that they are very concerned. And you've
13 seen members of Congress come out and you've seen Governor Gavin
14 Newsom from my former state of California come out and troll governors of
15 other states over this, that this is an existential threat to the seats that have
16 been gerrymandered for minority congressional candidates who get in there
17 and then keep them for years.
18

19 And some of these districts stretch 200 miles and they go around
20 multiple counties and they cross bodies of water and they violate concepts in
21 the voting rights laws that have to do with compactness of districts,
22 contiguity of districts and respect for political subdivisions. For example, the
23 types of lines that are drawn for state legislative districts, these
24 congressional monster districts They look like snakes and they, I mean,
25 they're really quite ridiculous. And so the Supreme Court is actually going to
26

Transcript of
August 6, 2025 NPR Redistricting Video



1 **Ailsa Chang:** The fight over redistricting in Texas drags on as Democrats
2 continue to deny state Republicans a quorum for a vote. Texas Governor Greg
3 Abbott has called for the arrest of Democrats who fled the state this week,
4 and he is asking the state Supreme Court to remove Gene Wu, the chair of
5 the state's Democratic caucus.
6

7 Meanwhile, Democrats have vowed to stay out of the state of Texas
8 until late August when the special session ends. So, what is next in this
9 redistricting standoff, and how might Republicans in the state move forward?
10

11 Well, for more on that, we're joined now by Representative Tom
12 Oliverson, Chair of the Texas House Republican Caucus. Welcome.

13 **Rep. Tom Oliverson:** Thank you, Ailsa. It's a pleasure to be with you.
14

15 **Ailsa Chang:** It's a pleasure to have you. So this congressional map. It's
16 being redrawn after your party already drew it in 2021. And one of the main
17 objections to what you all are doing is that Texas Republicans are doing this
18 only because President Trump asked you to do so.
19

20 Let me just ask you directly. Is that true? Are you redoing this map
21 now specifically because of the president's request?
22

23 **Rep. Tom Oliverson:** No, we are not. And in fact, the first conversations
24 that I heard about and had myself regarding redistricting began before the
25 legislative session began in January as a result of a court case where a
26 federal appeals court basically rejected the idea of the coalition districts as

1 being consistent with the Voting Rights Act.

2 **Ailsa Chang:** That said, President Trump does say that Republicans are,
3 “entitled to five more seats in Texas.” Do you agree with that, you are entitled
4 to five more seats?
5

6 **Rep. Tom Oliverson:** So I am on the main redistricting committee also, but
7 I'm not on the special select committee that's reviewing these particular
8 maps.
9

10 **Ailsa Chang:** Okay, so you're just not sure how you're entitled to or what's
11 the hesitation there?

12 **Rep. Tom Oliverson:** I think what I would say is that I know that we
13 certainly have the right to look at the maps and make changes. I think the
14 courts have consistently held that redistricting for purposes of political
15 performance by either party is acceptable.
16

17 Much has been said about the state of Illinois, where a lot of my
18 Democrat colleagues have taken refuge as being, you know, essentially a
19 state that overperforms for the Democrat Party by more than 30 points.
20

21 **Ailsa Chang:** Do you believe that Republicans are entitled to more seats?
22 You just don't know quite what the number is.
23

24 **Rep. Tom Oliverson:** I have been told, from a high-level perspective, is that
25 the majority of the redistricting work has centered around with these
26 particular seats that the majority of them are more compact than what they

Transcript of
August 11, 2025 CNN Jake Tapper
Greg Abbott Interview

1 Texans, as the minority party, uh, with a very small minority, they argue
2 that their only way to stop this redistricting effort is to deny Republicans in
3 the statehouse a quorum. So that's why they do, that's why they're doing
4 what they're doing, just to provide their explanation.

5
6 The Texas Tribune reports that in June, you told Texas Republican
7 delegation in Congress that you were reluctant to add redistricting to the
8 legislative agenda in Austin.

9
10 The Tribune says that President Trump then called you to discuss
11 redistricting, and you agreed to put it on the special session agenda. Would
12 you have gone forward with redistricting if President Trump had not
13 personally gotten involved and asked you to do this?

14 **Gov. Greg Abbott:** To be clear, Jake, this is something that I've been
15 interested in for a long time. First of all, I've been involved in redistricting
16 litigation for more than 20 years now.

17
18 Second, one thing that spurred all of this is a federal court decision that
19 came out last year. By the way, a case that was filed by Democrats, the
20 federal court decision that came out last year said that Texas is no longer
21 required to have coalition districts in it. And as a result, we had drawn maps
22 with coalition districts in it.

23
24 Now we wanted to remove those coalition districts and draw them in
25 ways that in fact turned out to provide more seats for Hispanics. For
26

1 example, four of the districts are predominantly Hispanic. It just coincides--
2 it's going to be Hispanic Republicans elected to those seats.

3 One thing that's happened in the state of Texas is the Hispanic
4 community, a lot of it, have decided they're no longer with the Democrats who
5 believe in open border policies, who believe in going against our law
6 enforcement who believe that men should play in women's sports and they
7 instead align with the Republicans. What we want to do is to draw districts
8 that give those Hispanics and African-Americans in the state of Texas the
9 ability to elect their candidate of choice.
10

11 **Jake Tapper:** That's not really, I mean, you're doing this to give Trump and
12 Republicans in the House of Representatives five additional seats, right? I
13 mean, that's the motivation is to stave off any midterm election losses.
14

15 **Gov. Greg Abbott:** Again, to be clear, Jake, the reason why we're doing this
16 is because of that court decision. Texas is now authorized under law that
17 changed that was different than in 2021 when we last did redistricting, under
18 new law as well as new facts that surface in the aftermath of the Trump
19 election, showing that many regions of the state that historically had voted
20 Democrat that were highly Hispanic now chose to vote Republican and vote
21 for Trump as well as other Republican candidates. Districts where the
22 electorate voted heavily for Trump, they were trapped in a Democrat
23 congressional district that have every right to vote for a member of Congress
24 who's a Republican, we will give them that ability.
25
26

1 second year in office, in her final term, she and her family just checked her
2 into a dementia center in Texas, and nobody represented that congressional
3 district for like 6 to 8 months or something. And I don't recall you saying
4 anything then.

5
6 **Gov. Greg Abbott:** I have the authority to apply the Texas Constitution to
7 these members of the Texas House of Representatives. With regard to
8 members of Congress, that's going to be up to the congressional delegation
9 and to the federal laws of which the state would have no control over.

10
11 What I do have control over, Jake, is what we're dealing with right
12 now. And that is I called a special session. I put items on the agenda. And by
13 Texas law, those runaway Democrats are required to act on that agenda.
14 They're failing to do their duty. So there's a violation of state law that allows
15 me to seek the removal of those who've abdicated their responsibility.

16
17 Let's play this out. If they do not get removed by this court, this process
18 is going to continue. I'm going to call special session after special session after
19 special session. They could remain in hiding for literally years, tying the
20 hands of the state of Texas from performing essential government needs.
21 That cannot be allowed. And that's exactly why I should prevail in my
22 lawsuit to have this Democrat removed from office because they are denying
23 Texas the ability to conduct business.

24
25 **Jake Tapper:** I mean, not entirely, though, right? Because, I mean, there
26 are filing deadlines for candidates in September and November, and then in

1 March, of course, would be the primaries in Texas. So they really, I mean, I'm
2 not, I'm not advocating this, but they really only need to wait you out until
3 the fall.

4 **Gov. Greg Abbott:** Yeah. Sorry, Jake, that's not the case, because I can call
5 a special session at any time to have these districts redrawn. And even if we
6 get to and beyond the filing deadline, we are still going to redraw these maps.
7

8 Before we've done this, what we can do again, and that is have two
9 different elections, one for all the other candidates on the ballot, one for
10 members of Congress. And that's exactly what we'll do this time.
11

12 If they think all they have to do is wait it out until November,
13 December, they're wrong. I'm going to do this for the next two years and
14 they're going to have to basically take up residency in Illinois, they might as
15 well start voting in Illinois.
16

17 **Jake Tapper:** Well, let me ask you just this final question, sir, as a bigger
18 picture item, which is what's unusual about this is that you're attempting to
19 do it in 2025 as opposed to waiting till the end of the decade is normally is
20 when the redistricting takes place.
21

22 You've explained the Supreme Court decision that led you to do this.
23 But what's going on, obviously, is not happening in Texas. It's not happening
24 in a vacuum. We have Democrats in California and New York and other
25 states saying, well, if Governor Abbott does this in Texas, we're going to add
26 five Democratic seats. Are you not worried at all about a redistricting,

District	2020 Census			Special Tabulation of Citizen Voting Age Population (CVAP) from the 2019-2023 American Community Survey with Margins of Error													
	Total	VAP	CVAP	Hispanic CVAP		Citizen Voting Age Population (CVAP)						Not Hispanic or Latino					
				% Hispanic	% Black + American Indian	% Black Alone	% Black + White	% White Alone	% Asian Indian Alone	% Asian Alone	% Native Hawaiian Alone	% American Indian + White	% Asian + White	% Remainder 2 or More Other			
1	766,987	585,265	554,725 (±7,698)	10.3 (±0.5)	18.3 (±0.6)	0.5 (±0.1)	0.1 (±0.1)	68.2 (±0.6)	0.2 (±0.1)	0.8 (±0.1)	0.1 (±0.1)	1.1 (±0.1)	0.2 (±0.1)	0.2 (±0.1)			
2	766,987	557,917	493,575 (±9,637)	22.6 (±0.9)	12.7 (±0.8)	0.6 (±0.2)	0.1 (±0.1)	58.8 (±0.9)	0.1 (±0.1)	3.5 (±0.3)	0.1 (±0.1)	0.6 (±0.1)	0.5 (±0.1)	0.3 (±0.1)			
3	766,987	559,329	538,025 (±8,768)	12.6 (±0.6)	10.6 (±0.7)	0.5 (±0.2)	0.1 (±0.1)	64.8 (±0.7)	0.2 (±0.1)	9.5 (±0.5)	0.1 (±0.1)	0.6 (±0.1)	0.7 (±0.1)	0.3 (±0.1)			
4	766,987	577,526	537,345 (±7,517)	10.6 (±0.5)	9.5 (±0.5)	0.6 (±0.1)	0.1 (±0.1)	70.1 (±0.6)	0.3 (±0.1)	7.0 (±0.4)	0.1 (±0.1)	1.0 (±0.1)	0.4 (±0.1)	0.3 (±0.1)			
5	766,987	573,597	515,100 (±8,293)	19.2 (±0.7)	15.5 (±0.8)	0.7 (±0.2)	0.2 (±0.1)	58.5 (±0.6)	0.2 (±0.1)	4.2 (±0.4)	0.0 (±0.1)	0.8 (±0.1)	0.4 (±0.1)	0.4 (±0.1)			
6	766,987	572,594	492,065 (±7,459)	23.0 (±0.7)	15.0 (±0.6)	0.6 (±0.1)	0.2 (±0.1)	56.8 (±0.7)	0.2 (±0.1)	2.8 (±0.3)	0.1 (±0.1)	0.8 (±0.1)	0.3 (±0.1)	0.2 (±0.1)			
7	766,987	594,919	470,615 (±9,010)	21.2 (±0.9)	21.6 (±1.0)	0.5 (±0.1)	0.2 (±0.1)	36.6 (±0.7)	0.2 (±0.1)	18.3 (±0.8)	0.0 (±0.1)	0.3 (±0.1)	0.7 (±0.1)	0.4 (±0.1)			
8	766,987	565,897	518,730 (±10,288)	23.6 (±1.0)	12.7 (±0.7)	0.7 (±0.2)	0.1 (±0.1)	55.9 (±0.8)	0.2 (±0.1)	5.4 (±0.6)	0.1 (±0.1)	0.7 (±0.1)	0.3 (±0.1)	0.2 (±0.1)			
9	766,987	565,956	448,920 (±8,617)	25.6 (±0.9)	45.0 (±1.1)	0.7 (±0.2)	0.3 (±0.1)	18.1 (±0.7)	0.2 (±0.1)	9.3 (±0.6)	0.0 (±0.1)	0.2 (±0.1)	0.3 (±0.1)	0.4 (±0.1)			
10	766,987	591,007	553,495 (±8,113)	18.3 (±0.6)	10.9 (±0.6)	0.4 (±0.1)	0.1 (±0.1)	64.7 (±0.6)	0.1 (±0.1)	3.7 (±0.3)	0.1 (±0.1)	0.8 (±0.1)	0.5 (±0.1)	0.3 (±0.1)			
11	766,987	567,819	521,930 (±8,102)	33.1 (±0.9)	11.3 (±0.6)	0.8 (±0.2)	0.1 (±0.1)	51.3 (±0.7)	0.2 (±0.1)	1.5 (±0.2)	0.2 (±0.1)	0.7 (±0.1)	0.4 (±0.1)	0.3 (±0.1)			
12	766,987	580,455	556,389 (±9,298)	18.9 (±0.8)	11.4 (±0.6)	0.5 (±0.1)	0.1 (±0.1)	64.3 (±0.7)	0.2 (±0.1)	3.1 (±0.3)	0.1 (±0.1)	0.7 (±0.1)	0.4 (±0.1)	0.2 (±0.1)			
13	766,987	585,231	541,205 (±7,128)	21.6 (±0.6)	6.6 (±0.4)	0.6 (±0.1)	0.1 (±0.1)	67.3 (±0.5)	0.4 (±0.1)	1.5 (±0.2)	0.1 (±0.1)	1.1 (±0.1)	0.5 (±0.1)	0.2 (±0.1)			
14	766,987	585,292	549,730 (±8,162)	19.6 (±0.6)	16.2 (±0.6)	0.7 (±0.1)	0.1 (±0.1)	59.9 (±0.7)	0.2 (±0.1)	2.4 (±0.2)	0.0 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.1 (±0.1)			
15	766,987	551,585	443,875 (±7,843)	74.5 (±0.9)	1.6 (±0.2)	0.2 (±0.1)	0.0 (±0.1)	21.8 (±0.6)	0.1 (±0.1)	1.2 (±0.2)	0.1 (±0.1)	0.3 (±0.1)	0.2 (±0.1)	0.1 (±0.1)			
16	766,987	573,880	495,475 (±8,769)	79.2 (±0.9)	3.5 (±0.3)	0.3 (±0.1)	0.1 (±0.1)	14.7 (±0.5)	0.3 (±0.1)	1.1 (±0.2)	0.1 (±0.1)	0.2 (±0.1)	0.3 (±0.1)	0.3 (±0.1)			
17	766,987	589,524	553,495 (±8,140)	18.9 (±0.7)	15.0 (±0.6)	0.6 (±0.1)	0.1 (±0.1)	61.9 (±0.7)	0.2 (±0.1)	1.6 (±0.2)	0.0 (±0.1)	1.1 (±0.2)	0.4 (±0.1)	0.2 (±0.1)			
18	766,987	576,291	472,190 (±6,861)	30.4 (±0.9)	38.8 (±1.0)	0.7 (±0.2)	0.2 (±0.1)	23.4 (±0.6)	0.2 (±0.1)	5.3 (±0.4)	0.1 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.4 (±0.2)			
19	766,987	578,679	543,075 (±6,969)	33.3 (±0.7)	6.0 (±0.3)	0.5 (±0.1)	0.1 (±0.1)	57.6 (±0.6)	0.2 (±0.1)	1.1 (±0.1)	0.1 (±0.1)	0.8 (±0.1)	0.2 (±0.1)	0.2 (±0.1)			
20	766,987	574,548	514,540 (±9,237)	68.1 (±1.0)	6.1 (±0.5)	0.7 (±0.2)	0.1 (±0.1)	21.5 (±0.6)	0.2 (±0.1)	2.2 (±0.2)	0.1 (±0.1)	0.3 (±0.1)	0.5 (±0.1)	0.3 (±0.1)			
21	766,987	604,056	590,435 (±8,492)	26.7 (±0.8)	3.7 (±0.4)	0.5 (±0.1)	0.0 (±0.1)	65.5 (±0.6)	0.1 (±0.1)	1.8 (±0.2)	0.1 (±0.1)	0.7 (±0.1)	0.5 (±0.1)	0.4 (±0.1)			
22	766,987	557,229	506,535 (±9,544)	24.6 (±0.9)	12.7 (±0.8)	0.7 (±0.2)	0.1 (±0.1)	49.2 (±0.8)	0.2 (±0.1)	11.3 (±0.7)	0.0 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.2 (±0.1)			
23	766,987	568,074	508,090 (±8,400)	57.4 (±0.9)	4.2 (±0.4)	0.6 (±0.1)	0.1 (±0.1)	34.1 (±0.7)	0.3 (±0.1)	2.0 (±0.3)	0.1 (±0.1)	0.4 (±0.1)	0.4 (±0.1)	0.3 (±0.1)			
24	766,987	581,738	522,250 (±7,844)	13.1 (±0.5)	7.4 (±0.5)	0.7 (±0.3)	0.1 (±0.1)	70.3 (±0.6)	0.2 (±0.1)	6.3 (±0.4)	0.2 (±0.1)	0.7 (±0.1)	0.6 (±0.1)	0.3 (±0.1)			
25	766,987	586,313	556,530 (±8,214)	16.7 (±0.6)	11.8 (±0.6)	0.5 (±0.1)	0.1 (±0.1)	66.7 (±0.6)	0.2 (±0.1)	2.5 (±0.2)	0.2 (±0.1)	0.8 (±0.1)	0.3 (±0.1)	0.3 (±0.1)			
26	766,987	569,880	555,245 (±8,214)	14.4 (±0.6)	9.5 (±0.5)	0.6 (±0.1)	0.2 (±0.1)	63.3 (±0.7)	0.2 (±0.1)	7.0 (±0.4)	0.1 (±0.1)	0.7 (±0.1)	0.7 (±0.1)	0.3 (±0.1)			
27	766,987	585,427	549,475 (±7,861)	48.6 (±0.9)	4.5 (±0.3)	0.3 (±0.1)	0.1 (±0.1)	44.1 (±0.6)	0.2 (±0.1)	1.2 (±0.2)	0.0 (±0.1)	0.6 (±0.1)	0.2 (±0.1)	0.1 (±0.1)			
28	766,987	552,637	472,680 (±7,997)	68.7 (±0.9)	5.2 (±0.4)	0.3 (±0.1)	0.1 (±0.1)	23.8 (±0.7)	0.1 (±0.1)	1.1 (±0.2)	0.0 (±0.1)	0.3 (±0.1)	0.2 (±0.1)	0.2 (±0.1)			
29	766,987	547,845	391,410 (±8,182)	63.5 (±1.1)	18.4 (±0.9)	0.4 (±0.2)	0.1 (±0.1)	13.7 (±0.6)	0.2 (±0.1)	3.2 (±0.4)	0.1 (±0.1)	0.2 (±0.1)	0.1 (±0.1)	0.1 (±0.1)			
30	766,987	577,974	501,160 (±8,750)	24.5 (±0.8)	46.0 (±1.1)	0.9 (±0.2)	0.3 (±0.1)	24.0 (±0.6)	0.2 (±0.1)	3.2 (±0.3)	0.0 (±0.1)	0.4 (±0.1)	0.3 (±0.1)	0.3 (±0.1)			
31	766,987	574,120	569,810 (±7,834)	18.9 (±0.6)	7.9 (±0.5)	0.8 (±0.1)	0.1 (±0.1)	66.5 (±0.6)	0.2 (±0.1)	3.3 (±0.3)	0.2 (±0.1)	1.0 (±0.1)	0.6 (±0.1)	0.5 (±0.1)			
32	766,987	593,970	470,465 (±7,872)	22.9 (±0.8)	23.4 (±1.0)	0.9 (±0.2)	0.2 (±0.1)	43.9 (±0.7)	0.2 (±0.1)	6.9 (±0.4)	0.1 (±0.1)	0.5 (±0.1)	0.7 (±0.1)	0.4 (±0.1)			
33	766,987	555,227	396,125 (±7,247)	43.6 (±1.0)	25.2 (±0.9)	0.7 (±0.2)	0.2 (±0.1)	23.4 (±0.7)	0.3 (±0.1)	5.7 (±0.4)	0.1 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.3 (±0.1)			
34	766,987	542,730	436,275 (±8,007)	86.6 (±0.8)	0.7 (±0.2)	0.1 (±0.1)	0.0 (±0.1)	11.7 (±0.5)	0.2 (±0.1)	0.4 (±0.1)	0.0 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.0 (±0.1)			

The American Community Survey provided estimated citizen voting age population (CVAP) data at the block group level in a Special Tabulation. Because the MOE can only be calculated using whole block groups, all block groups with more than 50% of the population in a district are included in the analysis. The Red-118 report provides a summary of the block groups used in the analysis.
 The percent for each CVAP population category is that group's CVAP divided by the CVAP total.
 Numbers in parentheses are margins of error at 90% confidence level.



Case 3:21-cv-00259-DCG-JES-JVB Document 1326-5 Filed 10/01/25 Page 2 of 2
 American Community Survey Special Tabulation
 Using Census and American Community Survey Data
 CONGRESSIONAL DISTRICTS - PLANC2193

2020 Census		Special Tabulation of Citizen Voting Age Population (CVAP) from the 2019-2023 American Community Survey with Margins of Error													
District	Total	VAP	Hispanic CVAP		Not Hispanic or Latino Citizen Voting Age Population (CVAP)										
			CVAP	% Hispanic	% Black Alone	% Black + White	% Black + American Indian	% White Alone	% American Indian Alone	% Asian Alone	% Native Hawaiian Alone	% American Indian + White	% Asian + White	% Remainder 2 or More Other	
35	766,987	583,808	536,330 (±9,198)	46.0 (±1.0)	13.0 (±0.7)	0.7 (±0.1)	0.2 (±0.1)	35.7 (±0.8)	0.1 (±0.1)	2.7 (±0.3)	0.1 (±0.1)	0.1 (±0.1)	0.5 (±0.1)	0.6 (±0.1)	0.4 (±0.1)
36	766,987	578,116	523,274 (±8,338)	22.8 (±0.8)	12.5 (±0.6)	0.7 (±0.2)	0.1 (±0.1)	59.1 (±0.7)	0.1 (±0.1)	3.4 (±0.3)	0.0 (±0.1)	0.6 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
37	766,987	622,654	563,535 (±8,534)	22.9 (±0.8)	7.0 (±0.5)	0.6 (±0.1)	0.1 (±0.1)	60.7 (±0.6)	0.1 (±0.1)	6.4 (±0.4)	0.1 (±0.1)	0.6 (±0.1)	0.6 (±0.1)	1.1 (±0.2)	0.5 (±0.2)
38	766,987	577,591	506,000 (±9,377)	19.7 (±0.8)	11.0 (±0.8)	0.6 (±0.1)	0.1 (±0.1)	58.2 (±0.8)	0.1 (±0.1)	8.6 (±0.6)	0.0 (±0.1)	0.5 (±0.1)	0.5 (±0.1)	0.7 (±0.2)	0.3 (±0.1)

The American Community Survey provided estimated citizen voting age population (CVAP) data at the block group level in a Special Tabulation. Because the MOE can only be calculated using whole block groups, all block groups with more than 50% of the population in a district are included in the analysis. The Red-118 report provides a summary of the block groups used in the analysis.
 The percent for each CVAP population category is that group's CVAP divided by the CVAP total.
 Numbers in parentheses are margins of error at 90% confidence level.

2020 Census		Special Tabulation of Citizen Voting Age Population (CVAP) from the 2019-2023 American Community Survey with Margins of Error													
District	Total	VAP	Hispanic CVAP		Not Hispanic or Latino Citizen Voting Age Population (CVAP)										
			CVAP	% Hispanic	% Black Alone	% Black + White	% Black + American Indian	% White Alone	% American Indian Alone	% Asian Alone	% Native Hawaiian Alone	% American Indian + White	% Asian + White	% Remainder 2 or More Other	
35	766,987	571,449	538,785 (±8,668)	51.6 (±0.9)	7.5 (±0.5)	0.5 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	37.2 (±0.6)	0.1 (±0.1)	1.6 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	0.3 (±0.1)
36	766,987	577,079	523,834 (±8,258)	19.5 (±0.7)	18.1 (±0.7)	0.7 (±0.2)	0.1 (±0.1)	0.2 (±0.1)	54.1 (±0.7)	0.2 (±0.1)	5.9 (±0.4)	0.0 (±0.1)	0.8 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
37	766,987	621,812	554,685 (±8,509)	28.6 (±0.9)	9.3 (±0.5)	0.6 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	54.0 (±0.6)	0.2 (±0.1)	4.9 (±0.3)	0.1 (±0.1)	0.6 (±0.1)	1.1 (±0.2)	0.5 (±0.2)
38	766,986	570,722	501,765 (±9,590)	20.5 (±0.9)	11.4 (±0.8)	0.6 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	56.5 (±0.7)	0.1 (±0.1)	9.2 (±0.6)	0.0 (±0.1)	0.5 (±0.1)	0.7 (±0.2)	0.3 (±0.1)

The American Community Survey provided estimated citizen voting age population (CVAP) data at the block group level in a Special Tabulation. Because the MOE can only be calculated using whole block groups, all block groups with more than 50% of the population in a district are included in the analysis. The Red-118 report provides a summary of the block groups used in the analysis.
 The percent for each CVAP population category is that group's CVAP divided by the CVAP total.
 Numbers in parentheses are margins of error at 90% confidence level.



District	Total	VAP	Special Tabulation of Citizen Voting Age Population (CVAP) from the 2015-2019 American Community Survey with Margins of Error		Citizen Voting Age Population (CVAP)									
			Hispanic CVAP		Not Hispanic or Latino					Not Hispanic or Latino				
			CVAP	% Hispanic	% Black Alone	% Black + White	% Black + American Indian	% White Alone	% American Indian Alone	% Asian Alone	% Native Hawaiian Alone	% American Indian + White	% Asian + White	% Remainder 2 or More Other
1	766,987	585,465	544,770 (±6,670)	8.3 (±0.4)	19.9 (±0.6)	0.3 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	0.8 (±0.1)	0.1 (±0.1)	0.5 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.1 (±0.1)
2	766,987	564,561	487,270 (±7,397)	19.2 (±0.7)	12.0 (±0.6)	0.3 (±0.1)	0.0 (±0.0)	0.3 (±0.1)	4.7 (±0.3)	0.1 (±0.1)	0.5 (±0.1)	0.4 (±0.1)	0.4 (±0.1)	0.3 (±0.1)
3	766,987	559,537	449,505 (±5,679)	11.6 (±0.5)	11.0 (±0.6)	0.3 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	6.2 (±0.4)	0.0 (±0.1)	0.4 (±0.1)	0.4 (±0.1)	0.4 (±0.1)	0.2 (±0.1)
4	766,987	576,718	482,805 (±5,280)	7.7 (±0.4)	9.1 (±0.4)	0.4 (±0.1)	0.1 (±0.1)	0.6 (±0.1)	7.9 (±0.4)	0.1 (±0.1)	0.8 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
5	766,987	575,347	472,865 (±5,879)	16.1 (±0.6)	16.8 (±0.6)	0.4 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	2.2 (±0.2)	0.0 (±0.1)	0.5 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
6	766,987	576,737	461,760 (±5,609)	19.7 (±0.6)	11.9 (±0.5)	0.4 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	2.9 (±0.2)	0.2 (±0.1)	0.5 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
7	766,987	591,030	412,860 (±5,929)	22.2 (±0.8)	18.2 (±0.8)	0.3 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	15.1 (±0.6)	0.0 (±0.1)	0.2 (±0.1)	0.7 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
8	766,986	571,646	443,135 (±7,128)	22.1 (±0.9)	17.5 (±0.8)	0.2 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	7.3 (±0.4)	0.1 (±0.1)	0.4 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
9	766,987	554,230	412,850 (±5,954)	48.5 (±0.9)	11.8 (±0.6)	0.3 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	1.6 (±0.2)	0.0 (±0.1)	0.4 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.1 (±0.1)
10	766,987	607,084	522,005 (±6,184)	14.1 (±0.5)	9.8 (±0.4)	0.3 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	3.4 (±0.2)	0.1 (±0.1)	0.5 (±0.1)	0.5 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
11	766,987	573,499	494,915 (±6,704)	32.2 (±0.8)	6.0 (±0.4)	0.2 (±0.1)	0.0 (±0.1)	0.3 (±0.1)	2.2 (±0.2)	0.0 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
12	766,987	574,244	468,665 (±6,181)	22.3 (±0.7)	8.4 (±0.5)	0.3 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	2.2 (±0.2)	0.0 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
13	766,987	585,859	533,215 (±5,594)	19.6 (±0.5)	6.6 (±0.3)	0.3 (±0.1)	0.1 (±0.1)	0.6 (±0.1)	1.5 (±0.2)	0.1 (±0.1)	0.7 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
14	766,987	579,779	517,605 (±6,824)	18.1 (±0.6)	16.4 (±0.6)	0.2 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	3.1 (±0.3)	0.0 (±0.1)	0.5 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
15	766,987	548,298	426,140 (±6,567)	73.9 (±0.9)	2.0 (±0.2)	0.1 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	0.6 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	0.0 (±0.1)	0.0 (±0.1)	0.0 (±0.1)
16	766,987	575,747	464,335 (±6,298)	77.7 (±0.7)	3.9 (±0.3)	0.2 (±0.1)	0.0 (±0.1)	0.4 (±0.1)	1.1 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
17	766,987	578,048	505,330 (±5,838)	18.2 (±0.6)	11.4 (±0.5)	0.3 (±0.1)	0.0 (±0.1)	0.3 (±0.1)	2.6 (±0.2)	0.1 (±0.1)	0.5 (±0.1)	0.5 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
18	766,987	585,317	467,745 (±7,546)	20.3 (±0.7)	53.9 (±0.9)	0.4 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	6.1 (±0.3)	0.1 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
19	766,987	578,679	532,905 (±5,922)	32.2 (±0.6)	6.1 (±0.3)	0.3 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	0.9 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.1 (±0.1)
20	766,987	577,537	508,760 (±6,922)	66.8 (±0.8)	9.6 (±0.5)	0.3 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	1.5 (±0.2)	0.1 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
21	766,987	612,155	550,360 (±6,605)	30.6 (±0.7)	3.7 (±0.3)	0.3 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	1.8 (±0.2)	0.1 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
22	766,987	560,011	455,350 (±6,473)	21.7 (±0.8)	10.5 (±0.6)	0.2 (±0.1)	0.0 (±0.1)	0.4 (±0.2)	10.7 (±0.5)	0.0 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.4 (±0.1)	0.2 (±0.1)
23	766,987	563,720	445,305 (±6,154)	54.6 (±0.9)	4.1 (±0.3)	0.2 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	1.9 (±0.2)	0.1 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
24	766,987	585,881	513,520 (±5,917)	12.5 (±0.5)	6.0 (±0.4)	0.3 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	5.9 (±0.4)	0.2 (±0.1)	0.6 (±0.1)	0.5 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
25	766,987	576,023	498,430 (±6,189)	16.4 (±0.6)	20.2 (±0.7)	0.3 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	2.2 (±0.2)	0.1 (±0.1)	0.4 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
26	766,987	573,937	484,310 (±5,548)	12.8 (±0.5)	9.2 (±0.5)	0.4 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	5.6 (±0.3)	0.1 (±0.1)	0.6 (±0.1)	0.5 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
27	766,987	575,420	498,920 (±6,567)	35.6 (±0.8)	7.7 (±0.4)	0.2 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	1.0 (±0.1)	0.0 (±0.1)	0.5 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.1 (±0.1)
28	766,987	542,258	399,555 (±6,302)	86.7 (±0.6)	0.4 (±0.1)	0.0 (±0.1)	0.0 (±0.1)	0.1 (±0.1)	3.8 (±0.2)	0.0 (±0.1)	0.2 (±0.1)	0.0 (±0.1)	0.0 (±0.1)	0.0 (±0.1)
29	766,987	547,297	390,975 (±6,295)	42.1 (±0.9)	33.8 (±0.9)	0.3 (±0.1)	0.3 (±0.1)	0.2 (±0.1)	0.8 (±0.3)	0.1 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
30	766,987	555,763	463,570 (±6,890)	21.4 (±0.7)	52.9 (±0.9)	0.5 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	4.0 (±0.4)	0.1 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.3 (±0.1)
31	766,987	571,338	493,770 (±6,239)	18.2 (±0.6)	13.8 (±0.6)	0.6 (±0.1)	0.2 (±0.1)	0.3 (±0.1)	2.4 (±0.2)	0.4 (±0.1)	0.9 (±0.1)	0.5 (±0.1)	0.5 (±0.2)	0.5 (±0.2)
32	766,987	592,618	488,680 (±6,053)	14.3 (±0.6)	12.9 (±0.6)	0.4 (±0.1)	0.2 (±0.1)	0.4 (±0.1)	7.1 (±0.4)	0.0 (±0.1)	0.8 (±0.1)	0.8 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
33	766,987	580,868	413,640 (±5,624)	34.7 (±0.8)	20.5 (±0.7)	0.3 (±0.1)	0.2 (±0.1)	0.3 (±0.1)	3.9 (±0.3)	0.0 (±0.1)	0.3 (±0.1)	0.4 (±0.1)	0.4 (±0.1)	0.2 (±0.1)
34	766,987	565,686	476,405 (±6,464)	71.8 (±0.8)	1.8 (±0.2)	0.1 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	1.1 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.0 (±0.1)

The American Community Survey provided estimated citizen voting age population (CVAP) data at the block group level in a Special Tabulation. Because the MOE can only be calculated using whole block groups, all block groups with more than 50% of the population in a district are included in the analysis. The Red-118 report provides a summary of the block groups used in the analysis. The percent for each CVAP population category is that group's CVAP divided by the CVAP total. Numbers in parentheses are margins of error at 90% confidence level.

District	2020 Census			Special Tabulation of Citizen Voting Age Population (CVAP) from the 2019-2023 American Community Survey with Margins of Error													
	Total	VAP	CVAP	Hispanic CVAP		Citizen Voting Age Population (CVAP)						Not Hispanic or Latino					
				% Hispanic	% Hispanic	% Black Alone	% Black + White	% Black + American Indian	% White Alone	% American Indian Alone	% Asian Alone	% Native Hawaiian Alone	% American Indian + White	% Asian + White	% Remainder 2 or More Other		
1	766,987	585,465	554,540 (±7,781)	10.4 (±0.5)	18.9 (±0.6)	0.5 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	67.7 (±0.7)	0.2 (±0.1)	0.8 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
2	766,987	564,561	506,620 (±9,782)	23.2 (±0.9)	13.3 (±0.8)	0.5 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	56.1 (±0.9)	0.1 (±0.1)	5.2 (±0.4)	0.1 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.6 (±0.1)	0.5 (±0.1)	0.3 (±0.1)
3	766,987	559,537	528,035 (±8,446)	13.8 (±0.6)	11.6 (±0.7)	0.6 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	64.5 (±0.7)	0.3 (±0.1)	7.6 (±0.5)	0.1 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.7 (±0.1)	0.5 (±0.1)	0.3 (±0.1)
4	766,987	576,718	530,930 (±7,778)	9.5 (±0.5)	9.6 (±0.5)	0.6 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	68.0 (±0.6)	0.3 (±0.1)	9.9 (±0.5)	0.1 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	1.0 (±0.1)	0.6 (±0.1)	0.4 (±0.1)
5	766,987	575,347	511,975 (±8,041)	19.4 (±0.7)	17.0 (±0.8)	0.7 (±0.2)	0.2 (±0.1)	0.2 (±0.1)	58.1 (±0.7)	0.3 (±0.1)	2.6 (±0.3)	0.1 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.9 (±0.1)	0.4 (±0.1)	0.3 (±0.1)
6	766,987	576,737	505,010 (±7,973)	21.6 (±0.7)	13.7 (±0.6)	0.6 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	58.8 (±0.7)	0.2 (±0.1)	3.5 (±0.3)	0.2 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.7 (±0.1)	0.4 (±0.1)	0.2 (±0.1)
7	766,987	591,030	450,995 (±8,491)	22.7 (±0.8)	19.5 (±1.0)	0.5 (±0.2)	0.2 (±0.1)	0.2 (±0.1)	39.1 (±0.8)	0.1 (±0.1)	16.5 (±0.8)	0.0 (±0.1)	0.0 (±0.1)	0.3 (±0.1)	0.7 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
8	766,986	571,646	505,895 (±9,909)	25.4 (±1.0)	17.4 (±0.9)	0.7 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	47.7 (±0.8)	0.2 (±0.1)	7.2 (±0.6)	0.1 (±0.1)	0.1 (±0.1)	0.6 (±0.1)	0.4 (±0.1)	0.4 (±0.1)	0.2 (±0.1)
9	766,987	554,230	427,065 (±8,105)	50.5 (±1.0)	12.1 (±0.7)	0.5 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	34.0 (±0.8)	0.2 (±0.1)	1.9 (±0.3)	0.0 (±0.1)	0.0 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.1 (±0.1)	0.1 (±0.1)
10	766,987	607,084	570,815 (±8,313)	16.1 (±0.6)	9.2 (±0.4)	0.4 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	68.5 (±0.6)	0.2 (±0.1)	3.7 (±0.3)	0.1 (±0.1)	0.1 (±0.1)	1.0 (±0.1)	0.5 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
11	766,987	573,499	519,535 (±8,556)	33.5 (±0.9)	6.6 (±0.5)	0.4 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	55.2 (±0.7)	0.2 (±0.1)	2.7 (±0.2)	0.0 (±0.1)	0.0 (±0.1)	0.7 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
12	766,987	574,244	525,099 (±8,783)	23.7 (±0.8)	9.4 (±0.5)	0.5 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	61.9 (±0.7)	0.2 (±0.1)	2.7 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	0.8 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
13	766,987	585,859	544,645 (±7,183)	21.7 (±0.6)	6.9 (±0.4)	0.6 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	67.1 (±0.5)	0.4 (±0.1)	1.5 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	1.0 (±0.1)	0.5 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
14	766,987	579,779	541,535 (±8,103)	20.3 (±0.7)	16.4 (±0.6)	0.6 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	57.9 (±0.7)	0.2 (±0.1)	3.4 (±0.3)	0.0 (±0.1)	0.0 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
15	766,987	548,298	452,505 (±8,107)	74.5 (±1.0)	2.0 (±0.2)	0.2 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	21.7 (±0.5)	0.2 (±0.1)	0.9 (±0.2)	0.0 (±0.1)	0.0 (±0.1)	0.4 (±0.1)	0.1 (±0.1)	0.0 (±0.1)	0.0 (±0.1)
16	766,987	575,747	495,415 (±8,693)	79.2 (±0.9)	3.5 (±0.3)	0.3 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	14.6 (±0.5)	0.3 (±0.1)	1.1 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
17	766,987	578,048	543,690 (±7,650)	19.4 (±0.6)	10.9 (±0.5)	0.8 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	63.7 (±0.6)	0.2 (±0.1)	3.2 (±0.3)	0.1 (±0.1)	0.0 (±0.1)	0.6 (±0.1)	0.7 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
18	766,987	585,317	491,620 (±8,739)	22.2 (±0.8)	50.8 (±1.0)	0.7 (±0.2)	0.2 (±0.1)	0.2 (±0.1)	17.9 (±0.6)	0.2 (±0.1)	6.9 (±0.5)	0.0 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.3 (±0.1)	0.4 (±0.1)
19	766,987	578,679	543,075 (±6,969)	33.3 (±0.7)	6.0 (±0.3)	0.5 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	57.6 (±0.6)	0.2 (±0.1)	1.1 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.8 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
20	766,987	577,537	511,990 (±8,975)	65.5 (±0.9)	10.4 (±0.6)	0.6 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	20.5 (±0.7)	0.2 (±0.1)	1.6 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	0.4 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
21	766,987	612,155	599,760 (±8,662)	30.9 (±0.8)	3.9 (±0.4)	0.6 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	60.8 (±0.6)	0.1 (±0.1)	2.0 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	0.7 (±0.1)	0.5 (±0.1)	0.4 (±0.1)	0.4 (±0.1)
22	766,987	560,011	509,120 (±9,982)	23.2 (±0.9)	11.6 (±0.8)	0.8 (±0.3)	0.2 (±0.1)	0.2 (±0.1)	51.1 (±0.9)	0.1 (±0.1)	11.9 (±0.7)	0.0 (±0.1)	0.0 (±0.1)	0.4 (±0.1)	0.5 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
23	766,987	563,720	510,330 (±8,844)	54.9 (±1.0)	4.3 (±0.4)	0.7 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	36.1 (±0.7)	0.2 (±0.1)	2.3 (±0.3)	0.1 (±0.1)	0.1 (±0.1)	0.5 (±0.1)	0.5 (±0.1)	0.4 (±0.1)	0.4 (±0.1)
24	766,987	585,881	524,470 (±7,944)	13.7 (±0.6)	7.7 (±0.5)	0.7 (±0.3)	0.1 (±0.1)	0.1 (±0.1)	69.2 (±0.7)	0.2 (±0.1)	6.6 (±0.4)	0.2 (±0.1)	0.1 (±0.1)	0.7 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
25	766,987	576,023	529,660 (±8,092)	20.1 (±0.7)	19.8 (±0.8)	0.5 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	55.6 (±0.6)	0.2 (±0.1)	2.3 (±0.3)	0.1 (±0.1)	0.1 (±0.1)	0.7 (±0.1)	0.2 (±0.1)	0.4 (±0.1)	0.4 (±0.1)
26	766,987	573,937	553,205 (±8,107)	14.9 (±0.6)	10.3 (±0.6)	0.6 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	65.3 (±0.7)	0.2 (±0.1)	6.7 (±0.4)	0.1 (±0.1)	0.1 (±0.1)	0.7 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
27	766,987	575,420	542,955 (±8,091)	36.8 (±0.9)	7.3 (±0.4)	0.4 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	52.8 (±0.6)	0.1 (±0.1)	1.3 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	0.7 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
28	766,987	542,258	412,510 (±7,450)	86.7 (±0.7)	0.7 (±0.2)	0.1 (±0.1)	0.0 (±0.1)	0.0 (±0.1)	11.5 (±0.5)	0.2 (±0.1)	0.5 (±0.1)	0.0 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	0.1 (±0.1)	0.0 (±0.1)	0.0 (±0.1)
29	766,987	547,297	420,955 (±8,890)	43.0 (±1.1)	32.7 (±1.1)	0.6 (±0.2)	0.3 (±0.1)	0.3 (±0.1)	18.2 (±0.7)	0.2 (±0.1)	4.1 (±0.5)	0.1 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.4 (±0.2)	0.4 (±0.2)
30	766,987	555,763	479,355 (±9,026)	25.0 (±0.9)	50.2 (±1.1)	0.8 (±0.2)	0.4 (±0.1)	0.4 (±0.1)	18.6 (±0.7)	0.2 (±0.1)	3.9 (±0.4)	0.1 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	0.2 (±0.1)	0.4 (±0.1)	0.4 (±0.1)
31	766,987	571,338	568,625 (±7,977)	19.3 (±0.6)	13.7 (±0.6)	1.0 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	60.3 (±0.6)	0.1 (±0.1)	2.9 (±0.3)	0.4 (±0.1)	0.1 (±0.1)	0.9 (±0.1)	0.6 (±0.1)	0.4 (±0.1)	0.4 (±0.1)
32	766,987	592,618	520,325 (±7,958)	16.0 (±0.6)	14.9 (±0.8)	0.7 (±0.2)	0.2 (±0.1)	0.2 (±0.1)	58.7 (±0.6)	0.2 (±0.1)	7.4 (±0.4)	0.1 (±0.1)	0.1 (±0.1)	0.7 (±0.1)	0.7 (±0.1)	0.4 (±0.1)	0.4 (±0.1)
33	766,987	580,868	427,065 (±7,363)	38.2 (±1.0)	19.6 (±0.8)	0.7 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	35.5 (±0.7)	0.3 (±0.1)	4.4 (±0.3)	0.0 (±0.1)	0.0 (±0.1)	0.5 (±0.1)	0.5 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
34	766,987	565,686	493,330 (±7,994)	71.9 (±0.9)	1.9 (±0.2)	0.2 (±0.1)	0.0 (±0.1)	0.0 (±0.1)	24.2 (±0.6)	0.2 (±0.1)	1.2 (±0.2)	0.0 (±0.1)	0.0 (±0.1)	0.3 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	0.1 (±0.1)

The American Community Survey provided estimated citizen voting age population (CVAP) data at the block group level in a Special Tabulation. Because the MOE can only be calculated using whole block groups, all block groups with more than 50% of the population in a district are included in the analysis. The Red-118 report provides a summary of the block groups used in the analysis.
 The percent for each CVAP population category is that group's CVAP divided by the CVAP total.
 Numbers in parentheses are margins of error at 90% confidence level.

2020 Census		Special Tabulation of Citizen Voting Age Population (CVAP) from the 2019-2023 American Community Survey with Margins of Error													
District	Total	VAP	Hispanic CVAP		Not Hispanic or Latino Citizen Voting Age Population (CVAP)										
			CVAP	% Hispanic	% Black Alone	% Black + White	% Black + American Indian	% White Alone	% American Indian Alone	% Asian Alone	% Native Hawaiian Alone	% American Indian + White	% Asian + White	% Remainder 2 or More Other	
35	766,987	571,449	538,785 (±8,668)	51.6 (±0.9)	7.5 (±0.5)	0.5 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	37.2 (±0.6)	0.1 (±0.1)	1.6 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	0.3 (±0.1)
36	766,987	578,616	521,239 (±8,189)	19.8 (±0.7)	16.2 (±0.6)	0.7 (±0.2)	0.1 (±0.1)	0.2 (±0.1)	57.5 (±0.7)	0.2 (±0.1)	4.1 (±0.3)	0.0 (±0.1)	0.9 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
37	766,987	621,812	554,685 (±8,509)	28.6 (±0.9)	9.3 (±0.5)	0.6 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	54.0 (±0.6)	0.2 (±0.1)	4.9 (±0.3)	0.1 (±0.1)	0.6 (±0.1)	1.1 (±0.2)	0.5 (±0.2)
38	766,987	572,486	502,760 (±9,533)	20.7 (±0.9)	11.5 (±0.8)	0.6 (±0.2)	0.1 (±0.1)	0.1 (±0.1)	56.4 (±0.8)	0.1 (±0.1)	9.1 (±0.6)	0.0 (±0.1)	0.5 (±0.1)	0.7 (±0.2)	0.4 (±0.1)

The American Community Survey provided estimated citizen voting age population (CVAP) data at the block group level in a Special Tabulation. Because the MOE can only be calculated using whole block groups, all block groups with more than 50% of the population in a district are included in the analysis. The Red-118 report provides a summary of the block groups used in the analysis.
 The percent for each CVAP population category is that group's CVAP divided by the CVAP total.
 Numbers in parentheses are margins of error at 90% confidence level.



District	2020 Census			Special Tabulation of Citizen Voting Age Population (CVAP) from the 2015-2019 American Community Survey with Margins of Error											
	Total	VAP	CVAP	Hispanic CVAP		Not Hispanic or Latino Citizen Voting Age Population (CVAP)									
				% Hispanic	% Black + White	% Black + American Indian	% White Alone	% Asian Alone	% Hawaiian Alone	% Native American + White	% Asian + White	% Remainder 2 or More			
1	766,987	585,465	544,770 (±6,670)	8.3 (±0.4)	19.9 (±0.6)	0.3 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	69.6 (±0.5)	0.4 (±0.1)	0.8 (±0.1)	0.1 (±0.1)	0.5 (±0.1)	0.1 (±0.1)	0.1 (±0.1)
2	766,987	565,217	490,525 (±7,345)	18.6 (±0.7)	11.4 (±0.6)	0.3 (±0.1)	0.0 (±0.0)	0.2 (±0.1)	63.7 (±0.7)	0.2 (±0.1)	4.5 (±0.3)	0.1 (±0.1)	0.5 (±0.1)	0.4 (±0.1)	0.3 (±0.1)
3	766,987	559,537	449,505 (±5,679)	11.6 (±0.5)	11.0 (±0.6)	0.3 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	69.4 (±0.6)	0.4 (±0.1)	6.2 (±0.4)	0.0 (±0.1)	0.4 (±0.1)	0.4 (±0.1)	0.2 (±0.1)
4	766,987	576,718	482,805 (±5,280)	7.7 (±0.4)	9.1 (±0.4)	0.4 (±0.1)	0.1 (±0.1)	0.6 (±0.1)	72.7 (±0.5)	0.6 (±0.1)	7.9 (±0.4)	0.1 (±0.1)	0.8 (±0.1)	0.4 (±0.1)	0.2 (±0.1)
5	766,987	575,347	472,865 (±5,879)	16.1 (±0.6)	16.8 (±0.6)	0.4 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	63.0 (±0.5)	0.4 (±0.1)	2.2 (±0.2)	0.0 (±0.1)	0.5 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
6	766,987	576,920	461,730 (±5,595)	19.7 (±0.6)	12.2 (±0.5)	0.4 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	63.0 (±0.5)	0.3 (±0.1)	2.9 (±0.2)	0.2 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
7	766,987	592,451	417,755 (±5,962)	22.3 (±0.8)	17.2 (±0.8)	0.2 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	43.1 (±0.7)	0.2 (±0.1)	15.8 (±0.6)	0.0 (±0.1)	0.3 (±0.1)	0.6 (±0.1)	0.2 (±0.1)
8	766,987	572,866	442,565 (±7,100)	21.5 (±0.8)	17.5 (±0.8)	0.3 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	53.3 (±0.7)	0.3 (±0.1)	6.0 (±0.4)	0.1 (±0.1)	0.4 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
9	766,987	555,835	416,985 (±6,084)	47.7 (±0.9)	11.9 (±0.6)	0.3 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	37.8 (±0.6)	0.3 (±0.1)	1.3 (±0.2)	0.0 (±0.1)	0.4 (±0.1)	0.1 (±0.1)	0.1 (±0.1)
10	766,987	607,084	522,005 (±6,184)	14.1 (±0.5)	9.8 (±0.4)	0.3 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	70.8 (±0.5)	0.3 (±0.1)	3.4 (±0.2)	0.1 (±0.1)	0.5 (±0.1)	0.5 (±0.1)	0.2 (±0.1)
11	766,987	573,499	494,915 (±6,704)	32.2 (±0.8)	6.0 (±0.4)	0.2 (±0.1)	0.0 (±0.1)	0.3 (±0.1)	58.0 (±0.6)	0.3 (±0.1)	2.2 (±0.2)	0.0 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
12	766,987	574,244	468,665 (±6,181)	22.3 (±0.7)	8.4 (±0.5)	0.3 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	65.0 (±0.6)	0.4 (±0.1)	2.2 (±0.2)	0.0 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
13	766,987	585,859	533,215 (±5,594)	19.6 (±0.5)	6.6 (±0.3)	0.3 (±0.1)	0.1 (±0.1)	0.6 (±0.1)	70.0 (±0.4)	0.6 (±0.1)	1.5 (±0.2)	0.1 (±0.1)	0.7 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
14	766,987	576,965	504,410 (±6,733)	16.7 (±0.6)	17.0 (±0.6)	0.2 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	60.5 (±0.6)	0.3 (±0.1)	4.3 (±0.3)	0.0 (±0.1)	0.5 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
15	766,987	548,298	426,140 (±6,567)	73.9 (±0.9)	2.0 (±0.2)	0.1 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	22.9 (±0.5)	0.2 (±0.1)	0.6 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	0.0 (±0.1)	0.0 (±0.1)
16	766,987	575,747	464,335 (±6,298)	77.7 (±0.7)	3.9 (±0.3)	0.2 (±0.1)	0.0 (±0.1)	0.4 (±0.1)	16.1 (±0.5)	0.4 (±0.1)	1.1 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
17	766,987	577,865	505,360 (±5,851)	18.2 (±0.6)	11.1 (±0.5)	0.3 (±0.1)	0.0 (±0.1)	0.3 (±0.1)	66.3 (±0.4)	0.3 (±0.1)	2.6 (±0.2)	0.1 (±0.1)	0.5 (±0.1)	0.5 (±0.1)	0.2 (±0.1)
18	766,987	584,155	472,135 (±7,457)	21.8 (±0.7)	53.7 (±0.9)	0.4 (±0.1)	0.1 (±0.1)	0.1 (±0.1)	18.1 (±0.5)	0.1 (±0.1)	5.2 (±0.3)	0.1 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
19	766,987	578,679	532,905 (±5,922)	32.2 (±0.6)	6.1 (±0.3)	0.3 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	59.1 (±0.5)	0.4 (±0.1)	0.9 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.1 (±0.1)
20	766,987	577,537	508,760 (±6,922)	66.8 (±0.8)	9.6 (±0.5)	0.3 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	20.6 (±0.5)	0.2 (±0.1)	1.5 (±0.2)	0.1 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
21	766,987	612,155	550,360 (±6,605)	30.6 (±0.7)	3.7 (±0.3)	0.3 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	62.1 (±0.5)	0.2 (±0.1)	1.8 (±0.2)	0.1 (±0.1)	0.6 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
22	766,987	561,423	448,490 (±6,528)	23.6 (±0.8)	9.8 (±0.6)	0.3 (±0.1)	0.0 (±0.1)	0.4 (±0.2)	55.8 (±0.6)	0.4 (±0.2)	9.3 (±0.5)	0.0 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
23	766,987	563,720	445,305 (±6,154)	54.6 (±0.9)	4.1 (±0.3)	0.2 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	37.8 (±0.5)	0.3 (±0.1)	1.9 (±0.2)	0.1 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	0.3 (±0.1)
24	766,987	585,881	513,520 (±5,917)	12.5 (±0.5)	6.0 (±0.4)	0.3 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	73.2 (±0.4)	0.4 (±0.1)	5.9 (±0.4)	0.2 (±0.1)	0.6 (±0.1)	0.5 (±0.1)	0.3 (±0.1)
25	766,987	576,023	498,430 (±6,189)	16.4 (±0.6)	20.2 (±0.7)	0.3 (±0.1)	0.1 (±0.1)	0.3 (±0.1)	59.6 (±0.5)	0.3 (±0.1)	2.2 (±0.2)	0.1 (±0.1)	0.4 (±0.1)	0.2 (±0.1)	0.2 (±0.1)
26	766,987	573,937	484,310 (±5,548)	12.8 (±0.5)	9.2 (±0.5)	0.4 (±0.1)	0.1 (±0.1)	0.4 (±0.1)	70.2 (±0.5)	0.4 (±0.1)	5.6 (±0.3)	0.1 (±0.1)	0.6 (±0.1)	0.5 (±0.1)	0.2 (±0.1)
27	766,987	575,420	498,920 (±6,567)	35.6 (±0.8)	7.7 (±0.4)	0.2 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	54.4 (±0.6)	0.2 (±0.1)	1.0 (±0.1)	0.0 (±0.1)	0.5 (±0.1)	0.1 (±0.1)	0.1 (±0.1)
28	766,987	542,258	399,555 (±6,302)	86.7 (±0.6)	0.4 (±0.1)	0.0 (±0.1)	0.0 (±0.1)	0.1 (±0.1)	11.8 (±0.5)	0.1 (±0.1)	0.8 (±0.2)	0.0 (±0.1)	0.2 (±0.1)	0.0 (±0.1)	0.0 (±0.1)
29	766,987	548,260	390,580 (±6,276)	42.1 (±0.9)	33.6 (±0.9)	0.3 (±0.1)	0.3 (±0.1)	0.3 (±0.1)	18.9 (±0.5)	0.2 (±0.1)	4.0 (±0.3)	0.1 (±0.1)	0.2 (±0.1)	0.1 (±0.1)	0.2 (±0.1)
30	766,987	555,763	463,570 (±6,890)	21.4 (±0.7)	52.9 (±0.9)	0.5 (±0.1)	0.1 (±0.1)	0.2 (±0.1)	20.0 (±0.5)	0.2 (±0.1)	4.0 (±0.4)	0.1 (±0.1)	0.2 (±0.1)	0.2 (±0.1)	0.3 (±0.1)
31	766,987	571,338	493,770 (±6,239)	18.2 (±0.6)	13.8 (±0.6)	0.6 (±0.1)	0.2 (±0.1)	0.3 (±0.1)	62.2 (±0.5)	0.3 (±0.1)	2.4 (±0.2)	0.4 (±0.1)	0.9 (±0.1)	0.5 (±0.1)	0.5 (±0.2)
32	766,987	592,618	488,680 (±6,053)	14.3 (±0.6)	12.9 (±0.6)	0.4 (±0.1)	0.2 (±0.1)	0.4 (±0.1)	63.1 (±0.5)	0.4 (±0.1)	7.1 (±0.4)	0.0 (±0.1)	0.8 (±0.1)	0.4 (±0.1)	0.3 (±0.1)
33	766,987	580,868	413,640 (±5,624)	34.7 (±0.8)	20.5 (±0.7)	0.3 (±0.1)	0.2 (±0.1)	0.3 (±0.1)	39.2 (±0.6)	0.3 (±0.1)	3.9 (±0.3)	0.0 (±0.1)	0.3 (±0.1)	0.4 (±0.1)	0.2 (±0.1)
34	766,987	565,686	476,405 (±6,464)	71.8 (±0.8)	1.8 (±0.2)	0.1 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	24.6 (±0.5)	0.2 (±0.1)	1.1 (±0.1)	0.0 (±0.1)	0.2 (±0.1)	0.1 (±0.1)	0.0 (±0.1)

The American Community Survey provided estimated citizen voting age population (CVAP) data at the block group level in a Special Tabulation. Because the MOE can only be calculated using whole block groups, all block groups with more than 50% of the population in a district are included in the analysis. The Red-118 report provides a summary of the block groups used in the analysis.
 The percent for each CVAP population category is that group's CVAP divided by the CVAP total.
 Numbers in parentheses are margins of error at 90% confidence level.

Using Census and American Community Survey Data
CONGRESSIONAL DISTRICTS - PLANC2333

District	2020 Census			Special Tabulation of Citizen Voting Age Population (CVAP) from the 2019-2023 American Community Survey with Margins of Error														
	Total	VAP	CVAP	Hispanic CVAP		Not Hispanic or Latino Citizen Voting Age Population (CVAP)												
				% Hispanic	% Hispanic	% Black Alone	% Black + White	% Black + American Indian	% White Alone	% American Indian Alone	% Asian Alone	% Native Hawaiian Alone	% American Indian + White	% Asian + White	% Remainder 2 or More Other			
1	766,987	585,465	554,540	10.4	10.4	18.9	0.5	0.1	67.7	0.2	0.8	0.1	0.1	0.1	0.1	0.1	0.2	0.2
2	766,987	565,217	504,460	22.1	22.1	12.8	0.6	0.1	57.7	0.1	5.1	0.1	0.1	0.1	0.1	0.1	0.5	0.3
3	766,987	559,537	528,035	13.8	13.8	11.6	0.7	0.6	64.5	0.3	7.6	0.1	0.1	0.1	0.1	0.7	0.5	0.3
4	766,987	576,718	530,930	9.5	9.5	9.6	0.5	0.1	68.0	0.3	9.9	0.1	0.1	0.1	0.1	1.0	0.6	0.4
5	766,987	575,347	511,975	19.4	19.4	17.0	0.8	0.7	58.1	0.3	2.6	0.1	0.1	0.1	0.1	0.9	0.4	0.3
6	766,987	576,920	502,070	21.8	21.8	14.0	0.7	0.6	58.3	0.2	3.5	0.2	0.1	0.1	0.1	0.7	0.4	0.2
7	766,987	592,451	453,310	23.0	23.0	18.2	1.0	0.5	39.6	0.1	17.1	0.0	0.1	0.1	0.1	0.3	0.7	0.3
8	766,987	572,866	508,405	24.9	24.9	18.0	0.9	0.7	49.3	0.2	5.5	0.1	0.1	0.1	0.1	0.7	0.4	0.3
9	766,987	555,835	427,745	50.3	50.3	11.5	0.7	0.5	35.1	0.1	1.7	0.0	0.1	0.1	0.1	0.4	0.1	0.1
10	766,987	607,084	570,815	16.1	16.1	9.2	0.4	0.4	68.5	0.2	3.7	0.1	0.1	0.1	0.1	1.0	0.5	0.3
11	766,987	573,499	519,535	33.5	33.5	6.6	0.5	0.4	55.2	0.2	2.7	0.0	0.1	0.1	0.1	0.7	0.4	0.2
12	766,987	574,244	525,099	23.7	23.7	9.4	0.5	0.5	61.9	0.2	2.7	0.0	0.1	0.1	0.1	0.8	0.4	0.2
13	766,987	585,859	544,645	21.7	21.7	6.9	0.4	0.6	67.1	0.4	1.5	0.1	0.1	0.1	0.1	1.0	0.5	0.2
14	766,987	576,965	539,165	18.9	18.9	17.3	0.7	0.6	57.1	0.2	4.7	0.0	0.1	0.1	0.1	0.6	0.3	0.1
15	766,987	548,298	452,505	74.5	74.5	2.0	0.2	0.2	21.7	0.2	0.9	0.0	0.1	0.1	0.1	0.4	0.1	0.0
16	766,987	575,747	495,415	79.2	79.2	3.5	0.3	0.3	14.6	0.3	1.1	0.1	0.1	0.1	0.1	0.2	0.3	0.1
17	766,987	577,865	546,630	19.3	19.3	10.7	0.5	0.8	64.1	0.2	3.2	0.2	0.1	0.1	0.1	0.6	0.7	0.3
18	766,987	584,155	484,820	23.7	23.7	50.5	1.1	0.7	17.8	0.2	5.8	0.0	0.1	0.1	0.1	0.2	0.3	0.4
19	766,987	578,679	543,075	33.3	33.3	6.0	0.3	0.5	57.6	0.2	1.1	0.1	0.1	0.1	0.1	0.8	0.2	0.1
20	766,987	577,537	511,990	65.5	65.5	10.4	0.6	0.6	20.5	0.2	1.6	0.1	0.1	0.1	0.1	0.3	0.4	0.1
21	766,987	612,155	599,760	30.9	30.9	3.9	0.4	0.6	60.8	0.1	2.0	0.0	0.1	0.1	0.1	0.7	0.5	0.4
22	766,987	561,423	513,440	24.9	24.9	11.2	0.7	0.8	50.8	0.2	11.0	0.0	0.1	0.1	0.1	0.4	0.4	0.1
23	766,987	563,720	510,330	54.9	54.9	4.3	0.4	0.7	36.1	0.2	2.3	0.0	0.1	0.1	0.1	0.5	0.5	0.4
24	766,987	585,881	524,470	13.7	13.7	7.7	0.5	0.7	69.2	0.2	6.6	0.2	0.1	0.1	0.1	0.7	0.6	0.3
25	766,987	576,023	529,660	20.1	20.1	19.8	0.8	0.5	55.6	0.2	2.3	0.0	0.1	0.1	0.1	0.7	0.2	0.1
26	766,987	573,937	553,205	14.9	14.9	10.3	0.6	0.6	65.3	0.2	6.7	0.1	0.1	0.1	0.1	0.7	0.6	0.4
27	766,987	575,420	542,955	36.8	36.8	7.3	0.4	0.4	52.8	0.1	1.3	0.0	0.1	0.1	0.1	0.7	0.2	0.1
28	766,987	542,258	412,510	86.7	86.7	0.7	0.2	0.1	11.5	0.0	0.5	0.0	0.1	0.1	0.1	0.2	0.0	0.0
29	766,987	548,260	420,860	43.3	43.3	32.7	1.1	0.6	17.8	0.2	4.2	0.0	0.1	0.1	0.1	0.2	0.2	0.4
30	766,987	555,763	479,355	25.0	25.0	50.2	1.1	0.8	18.6	0.2	3.9	0.0	0.1	0.1	0.1	0.3	0.2	0.4
31	766,987	571,338	568,625	19.3	19.3	13.7	0.6	1.0	60.3	0.1	2.9	0.0	0.1	0.1	0.1	0.9	0.6	0.1
32	766,987	592,618	520,325	16.0	16.0	14.9	0.8	0.7	58.7	0.2	7.4	0.1	0.1	0.1	0.1	0.7	0.7	0.4
33	766,987	580,868	427,065	38.2	38.2	19.6	0.8	0.7	35.5	0.3	4.4	0.0	0.1	0.1	0.1	0.5	0.7	0.3
34	766,987	565,686	493,330	71.9	71.9	1.9	0.2	0.2	24.2	0.2	1.2	0.0	0.1	0.1	0.1	0.3	0.1	0.1

The American Community Survey provided estimated citizen voting age population (CVAP) data at the block group level in a Special Tabulation. Because the MOE can only be calculated using whole block groups, all block groups with more than 50% of the population in a district are included in the analysis. The Red-118 report provides a summary of the block groups used in the analysis. The percent for each CVAP population category is that group's CVAP divided by the CVAP total. Numbers in parentheses are margins of error at 90% confidence level.

		Special Tabulation of Citizen Voting Age Population (CVAP) from the 2019-2023 American Community Survey with Margins of Error											
		Hispanic CVAP		Not Hispanic or Latino Citizen Voting Age Population (CVAP)									
District	Total	VAP	% Hispanic	% Black Alone	% Black + White	% Black + American Indian	% White Alone	% American Indian Alone	% Asian Alone	% Native Hawaiian Alone	% American Indian + White	% Asian + White	% Remainder 2 or More Other
35	766,987	571,449	51.6 (±0.9)	7.5 (±0.5)	0.5 (±0.1)	0.1 (±0.1)	37.2 (±0.6)	0.1 (±0.1)	1.6 (±0.2)	0.1 (±0.1)	0.5 (±0.1)	0.4 (±0.1)	0.3 (±0.1)
36	766,987	577,079	19.5 (±0.7)	18.1 (±0.7)	0.7 (±0.2)	0.1 (±0.1)	54.1 (±0.7)	0.2 (±0.1)	5.9 (±0.4)	0.0 (±0.1)	0.8 (±0.1)	0.3 (±0.1)	0.2 (±0.1)
37	766,987	621,812	28.6 (±0.9)	9.3 (±0.5)	0.6 (±0.1)	0.1 (±0.1)	54.0 (±0.6)	0.2 (±0.1)	4.9 (±0.3)	0.1 (±0.1)	0.6 (±0.1)	1.1 (±0.2)	0.5 (±0.2)
38	766,986	570,722	20.5 (±0.9)	11.4 (±0.8)	0.6 (±0.2)	0.1 (±0.1)	56.5 (±0.7)	0.1 (±0.1)	9.2 (±0.6)	0.0 (±0.1)	0.5 (±0.1)	0.7 (±0.2)	0.3 (±0.1)

The American Community Survey provided estimated citizen voting age population (CVAP) data at the block group level in a Special Tabulation. Because the MOE can only be calculated using whole block groups, all block groups with more than 50% of the population in a district are included in the analysis. The Red-118 report provides a summary of the block groups used in the analysis.
 The percent for each CVAP population category is that group's CVAP divided by the CVAP total.
 Numbers in parentheses are margins of error at 90% confidence level.

Election Analysis

CONGRESSIONAL DISTRICTS - PLAN2333
2024 Democratic Primary Election

District	Total Voter Registration		Turnout	
	Total	SSVR-T	Total	TO/VR
STATE	17,908,587	24.6%	1,047,553	5.8%
1	501,925	7.0%	15,122	3.0%
2	502,908	16.2%	20,624	4.1%
3	519,550	9.6%	21,817	4.2%
4	516,105	6.0%	21,471	4.2%
5	453,273	14.8%	22,823	5.0%
6	465,777	16.1%	21,194	4.6%
7	410,961	16.6%	41,360	10.1%
8	469,398	17.8%	17,034	3.6%
9	367,281	43.4%	14,984	4.1%
10	509,758	9.9%	28,596	5.6%
11	461,165	25.2%	15,581	3.4%
12	475,792	18.5%	18,721	3.9%
13	470,819	16.0%	11,231	2.4%
14	498,894	14.0%	24,259	4.9%
15	414,327	68.5%	30,675	7.4%
16	453,163	67.4%	34,565	7.6%
17	479,796	13.7%	20,380	4.2%
18	437,637	18.6%	54,603	12.5%
19	447,088	27.5%	8,990	2.0%
20	426,325	56.3%	30,160	7.1%
21	574,594	22.5%	32,807	5.7%
22	489,822	17.6%	23,502	4.8%
23	508,403	45.6%	33,554	6.6%
24	521,404	9.4%	29,349	5.6%
25	475,726	13.4%	23,188	4.9%
26	542,039	9.9%	21,616	4.0%
27	490,301	27.9%	25,996	5.3%
28	408,402	80.5%	53,730	13.2%
29	353,590	36.0%	25,185	7.1%
30	432,453	18.6%	46,225	10.7%
31	527,017	12.8%	22,643	4.3%

For technical reasons, election results in Texas Legislative Council reports may vary slightly from the official election results. Complete official results for all elections are maintained by the Office of the Texas Secretary of State.
SSVR-T = Total Spanish surname voter registration



**CONGRESSIONAL DISTRICTS - PLAN2333
2024 General Election**

District	PRESIDENT										U.S. SEN									
	Harris-D	Oliver-L	Stein-G	Trump-R	Write-In-W	Allred-D	Andrus-W	Brown-L	Cruz-R	Roche-W	Harris-D	Oliver-L	Stein-G	Trump-R	Write-In-W	Allred-D	Andrus-W	Brown-L	Cruz-R	Roche-W
STATE	4,835,134	42.4%	68,563	0.6%	82,698	0.7%	6,393,403	56.1%	24,730	0.2%	5,031,142	44.6%	534	0.0%	266,944	2.4%	5,990,637	53.1%	976	0.0%
1	80,849	24.8%	1,483	0.5%	887	0.3%	241,937	74.3%	568	0.2%	82,927	25.6%	75	0.0%	5,794	1.8%	234,531	72.5%	37	0.0%
2	127,894	37.9%	2,186	0.6%	2,037	0.6%	204,879	60.8%	196	0.1%	133,454	39.7%	16	0.0%	7,669	2.3%	195,069	58.0%	53	0.0%
3	137,002	37.0%	2,397	0.6%	6,106	1.6%	223,499	60.3%	1,426	0.4%	146,476	40.0%	3	0.0%	8,282	2.3%	211,061	57.7%	11	0.0%
4	134,688	36.6%	2,126	0.6%	4,385	1.2%	225,173	61.2%	1,316	0.4%	142,661	39.2%	4	0.0%	6,825	1.9%	214,757	59.0%	18	0.0%
5	113,284	38.6%	1,630	0.6%	1,338	0.5%	176,445	60.1%	954	0.3%	119,428	41.1%	2	0.0%	5,823	2.0%	165,289	56.9%	5	0.0%
6	116,842	37.7%	1,909	0.6%	2,650	0.9%	187,707	60.6%	807	0.3%	123,598	40.2%	18	0.0%	7,260	2.4%	176,324	57.4%	32	0.0%
7	153,161	60.3%	1,812	0.7%	5,154	2.0%	93,647	36.8%	403	0.2%	158,844	63.1%	9	0.0%	7,039	2.8%	85,733	34.1%	23	0.0%
8	109,409	35.5%	1,510	0.5%	2,372	0.8%	194,542	63.2%	155	0.1%	114,939	37.5%	23	0.0%	7,027	2.3%	184,232	60.2%	39	0.0%
9	78,602	39.6%	884	0.4%	862	0.4%	118,059	59.5%	79	0.0%	83,994	42.8%	10	0.0%	5,364	2.7%	106,833	54.4%	34	0.0%
10	134,115	37.9%	2,536	0.7%	1,932	0.5%	214,016	60.5%	1,125	0.3%	138,068	39.3%	11	0.0%	7,967	2.3%	205,559	58.5%	23	0.0%
11	94,185	32.2%	1,837	0.6%	1,436	0.5%	194,566	66.5%	709	0.2%	97,833	33.7%	2	0.0%	6,690	2.3%	185,473	64.0%	5	0.0%
12	117,722	37.5%	2,030	0.6%	1,482	0.5%	192,704	61.3%	231	0.1%	124,201	39.6%	16	0.0%	7,626	2.4%	181,525	57.9%	59	0.0%
13	80,160	26.4%	1,761	0.6%	1,253	0.4%	220,451	72.5%	290	0.1%	83,426	27.6%	45	0.0%	6,331	2.1%	212,424	70.3%	87	0.0%
14	124,905	37.3%	1,809	0.5%	1,954	0.6%	206,313	61.5%	333	0.1%	130,033	39.1%	14	0.0%	7,473	2.2%	195,100	58.7%	27	0.0%
15	92,594	40.6%	879	0.4%	987	0.4%	133,260	58.5%	92	0.0%	98,313	44.1%	10	0.0%	5,154	2.3%	119,192	53.5%	14	0.0%
16	131,977	57.4%	1,329	0.6%	1,514	0.7%	94,337	41.1%	598	0.3%	130,415	58.4%	0	0.0%	9,212	4.1%	83,752	37.5%	0	0.0%
17	123,153	38.4%	2,255	0.7%	1,965	0.6%	192,397	60.0%	951	0.3%	127,734	40.1%	19	0.0%	7,570	2.4%	183,240	57.5%	52	0.0%
18	186,774	76.7%	1,223	0.5%	2,035	0.8%	53,113	21.8%	330	0.1%	189,202	78.5%	13	0.0%	5,699	2.4%	46,179	19.2%	26	0.0%
19	66,862	23.7%	1,655	0.6%	923	0.3%	212,708	75.3%	186	0.1%	69,100	24.6%	17	0.0%	6,622	2.4%	204,554	73.0%	36	0.0%
20	144,234	63.5%	1,224	0.5%	1,504	0.7%	79,607	35.0%	682	0.3%	147,207	66.6%	12	0.0%	5,952	2.7%	67,920	30.7%	0	0.0%
21	159,559	38.5%	2,735	0.7%	1,832	0.4%	249,973	60.2%	798	0.2%	165,018	40.1%	37	0.0%	9,216	2.2%	237,615	57.7%	22	0.0%
22	126,853	37.8%	2,046	0.6%	4,740	1.4%	201,204	59.9%	871	0.3%	133,919	40.4%	1	0.0%	8,778	2.6%	188,771	56.9%	13	0.0%
23	133,958	42.0%	1,680	0.5%	1,440	0.5%	181,139	56.8%	819	0.3%	139,780	44.7%	41	0.0%	7,456	2.4%	165,607	52.9%	29	0.0%
24	153,049	41.0%	2,829	0.8%	2,879	0.8%	213,062	57.1%	1,211	0.3%	161,074	43.2%	12	0.0%	7,897	2.1%	203,511	54.6%	54	0.0%
25	115,586	37.4%	1,755	0.6%	1,571	0.5%	189,974	61.4%	318	0.1%	121,251	39.4%	19	0.0%	6,749	2.2%	179,671	58.4%	48	0.0%
26	144,933	37.4%	2,576	0.7%	2,477	0.6%	237,076	61.2%	329	0.1%	152,638	39.5%	32	0.0%	8,168	2.1%	225,803	58.4%	61	0.0%
27	125,431	38.7%	1,968	0.6%	1,432	0.4%	194,210	60.0%	675	0.2%	129,727	40.4%	7	0.0%	7,650	2.4%	183,509	57.2%	17	0.0%
28	88,386	44.4%	636	0.3%	779	0.4%	109,011	54.8%	144	0.1%	92,823	48.6%	4	0.0%	4,973	2.6%	93,047	48.8%	6	0.0%
29	115,956	64.5%	984	0.5%	1,337	0.7%	61,282	34.1%	118	0.1%	120,271	67.6%	13	0.0%	5,173	2.9%	52,446	29.5%	18	0.0%
30	177,375	72.7%	1,442	0.6%	1,802	0.7%	62,616	25.7%	700	0.3%	181,319	75.2%	3	0.0%	5,528	2.3%	54,404	22.5%	15	0.0%
31	134,798	38.3%	2,486	0.7%	1,735	0.5%	211,460	60.1%	1,137	0.3%	138,543	39.8%	6	0.0%	9,100	2.6%	200,303	57.6%	6	0.0%
32	129,733	40.0%	2,208	0.7%	3,633	1.1%	187,134	57.7%	1,396	0.4%	137,124	42.7%	2	0.0%	6,811	2.1%	177,008	55.2%	11	0.0%

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SSVR-T = Total Spanish surname voter registration

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN § 3:21-CV-00259-DCG-JES-JVB
AMERICAN CITIZENS, ET AL §
§
V. § 9:02 A.M. TO 1:04 P.M.
§
GREG ABBOTT, IN HIS §
OFFICIAL CAPACITY AS §
GOVERNOR OF THE STATE OF §
TEXAS, ET AL § OCTOBER 1, 2024

PRELIMINARY INJUNCTION HEARING
BEFORE THE HONORABLE DAVID C. GUADERRAMA,
HONORABLE JERRY E. SMITH
AND HONORABLE JEFFREY V. BROWN
DAY 1 (MORNING SESSION) OF 9 DAYS

APPEARANCES:

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Laura Wells, RPR, RMR, CRR, RDR

1 **A.** Difficult? Absolutely.

2 **Q.** Maybe doesn't always bring out the best in folks?

3 **A.** Possibly.

4 **Q.** Well, I wanted to call your attention now to

09:17:30

5 this -- well, one last thing on your background, if you
6 don't mind.

7 Could you identify your race or ethnicity for our
8 record?

9 **A.** Latina.

09:17:39

10 **Q.** And transitioning to this, to what occurred this
11 summer, in late spring, early summer, I want to start off
12 and show you something that's been admitted as Brooks
13 Exhibit 335.

14 (Video played.)

09:17:54

15 **MR. TAPPER:** The Texas Tribune reports that in
16 June you told Texas Republicans delegation of Congress
17 that you were reluctant to add redistricting to the
18 legislative agenda in Austin. The Tribune says that
19 President Trump then called you to discuss redistricting,
20 and you agreed to put it on the special session agenda.

09:18:11

21 Would you have gone forward with redistricting if
22 President Trump had not personally got involved and asked
23 you to do this?

24 **GOVERNOR ABBOTT:** To be clear, Jake, this is

09:18:26

25 something that I have been interested in for a long time.

1 First of all, I have been involved in redistricting
2 litigation for more than 20 years now.

09:18:38

3 Second, one thing that spurred all this is a federal
4 court decision that came out last year, by the way, a case
5 that was filed by Democrats. The federal court decision
6 that came out last year said that Texas is no longer
7 required to have coalition districts. And as a result, we
8 had drawn maps with coalition districts in it. Now we
9 wanted to remove those coalition districts and draw them
10 in ways that, in fact, turned out to provide more seats
11 for Hispanics. For example, four of the districts are
12 predominantly Hispanic. It just coincides it's going to
13 be Hispanic Republicans elected to those seats.

09:18:56

14 One thing that's happened in the state of Texas is the
15 Hispanic community, a lot of it, have decided they are no
16 longer with the Democrats who believe in open border
17 policies, who believe in going against our law
18 enforcement, who believe that men should play in women's
19 sports. And they instead align with Republicans.

09:19:14

09:19:28

20 What we want to do is to draw districts that give
21 those Hispanics and African Americans in the state of
22 Texas the ability to elect their candidate of choice.

09:19:42

23 MR. TAPPER: But that's not really -- I mean, you
24 are doing this to give Trump and Republicans in the House
25 of Representatives five additional seats, right? I mean,

1 that's the motivation, is to stave off any midterm
2 election losses.

09:19:55

3 GOVERNOR ABBOTT: Again, to be clear, Jake, the
4 reason why we are doing this is because of that court
5 decision, Texas is now authorized under law that changed
6 that was different than in 2021 when we last did
7 redistricting. Under new law, as well as new facts that
8 served us in the aftermath of the Trump election, showing
9 that many regions of the state that historically had voted
10 Democrat that were highly Hispanic now chose to vote
11 Republican and vote for Trump as well as other Republican
12 candidates. Districts where the electorate voted heavily
13 for Trump, they were trapped in a Democrat congressional
14 district that have every right to vote for a member of
15 congress who is a Republican. We will give them that
16 ability.

09:20:30

17 (Video concluded.)

18 MR. DUNN: For the record, that was 3 minutes and
19 2 seconds to 5 minutes and 41 seconds.

09:20:39

20 BY MR. DUNN:

21 **Q.** Senator, what does the governor say is the reason,
22 quote, he is doing this, referring to redistricting?

23 **A.** Well, he is saying that he had been thinking of this
24 for a time and that he was doing it to create more

09:20:57

25 Republican seats.

Laura Wells, RPR, RMR, CRR, RDR

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**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, et al.,
Plaintiffs,**

3:21-CV-00259-DCG-JES-JVB

v.

2:20 p.m. to 6:01 p.m.

**GREG ABBOTT, IN HIS OFFICIAL
CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS, et al.,
Defendants.**

OCTOBER 2, 2025

**INJUNCTION HEARING
BEFORE THE HONORABLE DAVID C. GUADERRAMA
HONORABLE JERRY E. SMITH
AND HONORABLE JEFFREY V. BROWN
AFTERNOON SESSION, DAY 2 OF 9 DAYS**

APPEARANCES:

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17:46 1 record of defeating candidates of choice.

2 Q. If you didn't -- if you were drawing this map and you did
3 not have a goal of hitting a 50-percent Hispanic CVAP target in
4 CD9, but I told you you should still draw a Republican CD9 and
5 preserve 29, could you do it?

6 A. Yes, I believe that it would be possible. Basically, if
7 you were to restore the western portion of CD9 with CD9 to
8 District 29 and then wrap around the northern part of it, you
9 would be able to maintain this CD9 as a Republican district and
10 leave 29 as -- as an effective majority Latino district, and
11 not disrupt the partisan balance of the other Republican
12 districts.

13 Q. Thank you, Mr. Ely.

14 MS. PERALES: I pass the witness.

15 JUDGE GUADERRAMA: Mr. Thompson?

16 Oh, anyone else from Plaintiffs' side?

17 Mr. Thompson?

18 MR. THOMPSON: Thank you, Your Honor. May it please
19 the Court, Will Thompson for the State.

20 **CROSS-EXAMINATION**

21 **BY MR. THOMPSON:**

22 Q. Good to meet you, Mr. Ely. Am I pronouncing that
23 correctly?

24 A. Yes, you are.

25 Q. Great. You spoke on direct at some length about your work

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**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, et al.,
Plaintiffs,**

3:21-CV-00259-DCG-JES-JVB

v.

1:53 p.m. to 6:02 p.m.

**GREG ABBOTT, IN HIS OFFICIAL
CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS, et al.,
Defendants.**

OCTOBER 6, 2025

**INJUNCTION HEARING
BEFORE THE HONORABLE DAVID C. GUADERRAMA
THE HONORABLE JERRY E. SMITH
AND THE HONORABLE JEFFREY V. BROWN
AFTERNOON SESSION, DAY 5 OF 9 DAYS**

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17:31 1 Q. He didn't identify which districts might be changed?

2 A. No.

3 Q. And you, as the chair of the committee, were uninterested
4 in learning that at that point?

5 A. Well, understand there's -- there's often a number of maps
6 presented to a committee for consideration. And I had no idea
7 whether his map would be the map or one map of many.

8 Q. All right. I see. So at this point, you don't know
9 whether Adam Kincaid's map will end up being the one that
10 passes the Legislature. Do I have that right?

11 A. That's correct.

12 Q. When is it that you find that out?

13 A. I'm still not sure I can frame it as being Adam Kincaid's
14 map, so could you rephrase that?

15 Q. Sure. Well, let's just -- and that's, you know, perhaps my
16 own misunderstanding. So as we sit here today, on October the
17 6th, in federal court, in front of three federal judges, you're
18 the Senate sponsor of this legislation, and you can't tell us
19 under oath today who drew the map?

20 A. I know that Adam Kincaid had a major role in drawing the
21 map. But I also presume that many other people participated in
22 that process as well, particularly since it was amended in the
23 House.

24 Q. Well, whether Adam Kincaid drew some or all of the map,
25 when is it that you learned that an Adam Kincaid-related map

17:32 1 would be the one you would shepherd through the Senate?

2 A. I'm sorry. I just never thought of it in those terms. I
3 thought of it as being the House Map that was filed by the --
4 by Senator Hunter.

5 Q. Well, do you know that the House Map was an Adam
6 Kincaid-related map?

7 A. I -- I knew that Adam Kincaid had been heavily involved in
8 the drafting of a map.

9 Q. And that includes the House Map that you accepted --

10 A. That would include the House Map, HB4.

11 Q. Who is it that informed you that you would be moving
12 forward with an Adam Kincaid-related map?

13 A. Nobody ever directed me.

14 Q. So it's your testimony that you saw the map filed in the
15 House, you suspected it was Adam Kincaid-related, you liked it,
16 you had your lawyers analyze it, you filed it. Do I have that
17 right?

18 A. No. And it depends on whether you're talking about the
19 first or the second called session. The Lieutenant Governor,
20 as I mentioned earlier, had told me that they -- he had talked
21 to the Speaker and that they had decided -- they divided up all
22 the -- as they always do, they divided up all the major issues
23 between the House and the Senate. In this case I think there
24 were 17 on the call, on the Governor's call.

25 He informed me that the House would take the lead if

17:45 1 SENATOR KING: -- detailed issues.

2 SENATOR ALVARADO: Have a map?

3 SENATOR KING: I do not have a map.

4 SENATOR ALVARADO: Who is drawing the map?

5 SENATOR KING: I'm not drawing a map. I don't know of
6 anyone here today. They may be -- others may be trying to draw
7 a map. I'm not aware of that.

8 (Video concluded.)

9 Q. (BY MR. DUNN) You're not aware of someone else drawing a
10 map. Is that what you said on the Senate floor?

11 A. I said I was not aware of anyone else on the Senate floor
12 that was drawing a map.

13 Q. "I don't know of anyone here today. There may be others,
14 may be trying to draw a map. I'm not aware of that."

15 All right. So you're saying that only meant people on
16 the Senate floor.

17 Continuing at 19, line 16.

18 (Video played.)

19 SENATOR KING: But I -- traditionally, the way it's
20 happened in the past is, the Congressional Republican Caucus
21 has presented a map. But I haven't seen anything to date. But
22 I'm very confident at some point I will.

23 SENATOR ALVARADO: Do you know when you'll have a map?

24 SENATOR KING: I do not. I would not even plan on
25 looking at a map myself until after we got through the

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN § 3:21-CV-00259-DCG-JES-JVB
AMERICAN CITIZENS, ET AL §
§
V. § 9:00 A.M. TO 12:58 P.M.
§
GREG ABBOTT, IN HIS §
OFFICIAL CAPACITY AS §
GOVERNOR OF THE STATE OF §
TEXAS, ET AL § OCTOBER 7, 2025

PRELIMINARY INJUNCTION HEARING
BEFORE THE HONORABLE DAVID C. GUADERRAMA,
HONORABLE JERRY E. SMITH
AND HONORABLE JEFFREY V. BROWN
DAY 6 (MORNING SESSION) OF 9 DAYS

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1 district and then gone back and made changes to that
2 district based on that racial understanding?

3 **A.** No.

10:04:01

4 **Q.** I want to turn your attention now to how you came to
5 draw the maps in Texas in 2025 or the map.

6 We've heard evidence about a *New York Times* article in
7 June of 2025 that said something to the effect of
8 President Trump having conversations with Texas Republican
9 officials about mid-cycle redistricting.

10:04:18

10 **A.** Uh-huh.

11 **Q.** When, if ever, did you first become aware that the
12 White House was having conversations about redistricting?

10:04:36

13 **A.** It would have been earlier in 2025. I think I
14 was -- I was aware that people were meeting with White
15 House officials on redistricting probably February or
16 March.

17 **Q.** When you first learned about those meetings, did you
18 know at that point whether Texas would redistrict in 2025?

19 **A.** No.

10:04:51

20 **Q.** You have testified -- you testified that you wound up
21 drawing most of the map that passed in 2025 in Texas. How
22 did it happen that you got involved in that process?

23 **A.** Yeah. So running the National Republican
24 Redistricting Trust, typically when redistricting comes up
25 in conversation, you know, people suggest that they talk

10:05:11

1 to me about it.

2 So I was -- in early 2025, during these conversations
3 there was somebody going around Washington, D.C. talking
4 about redrawing the Texas congressional map; and they were
10:05:30 5 directed repeatedly to me. And eventually they got my
6 contact information.

7 **Q.** Don't be coy, Mr. Kincaid. Who was it?

8 **A.** It was the national committeeman for Texas, Robin
9 Armstrong.

10:05:42 10 **Q.** What does "national committeeman" mean?

11 **A.** He is one of the three members of the Republican
12 National Committee from Texas.

13 MR. KERCHER: Richard, could you please bring up
14 the demonstratives of Mr. Armstrong.

10:06:04 15 BY MR. KERCHER:

16 **Q.** Is this him?

17 **A.** Yes.

18 **Q.** Do you recall when you first began speaking with
19 Mr. Armstrong about redistricting in Texas?

10:06:12 20 MR. KERCHER: Thank you, Richard. You can take
21 it down.

22 **A.** I believe it was in March was when I first had a
23 conversation with Robin about this.

24 BY MR. KERCHER:

10:06:25 25 **Q.** Did you ever get hired by anybody as a part of

1 **A.** The Partisan Voting Index is technically called the
2 Cook Partisan Voting Index. It's produced by a group
3 called the Cook Political Report. And it's really just a
4 way of indexing all the districts in the country from the
5 most Republican and the most Democrat, comparing them to
6 the last two presidential elections.

10:14:27

7 **Q.** When you said a moment ago that you were not allowed
8 to make certain changes based on how districts had
9 previously performed --

10:14:43

10 **A.** Sure.

11 **Q.** -- by whom?

12 **A.** By the delegation.

13 **Q.** Okay. So you had talked about looking at incumbent
14 districts and what you wanted to do with those concerning
15 their past performance and how they would look in the new
16 map?

10:14:56

17 **A.** Right.

18 **Q.** What other criteria, if any, did you use when you drew
19 the map?

10:15:03

20 **A.** I wanted to improve the overall compactness of the
21 map. That was another criteria. So there was the
22 2193 map, the 2021 map. I just wanted to take those
23 districts and make them cleaner, more compact, more
24 city-based, more county-based, where I could than the
25 previous one. That's more of a personal preference more

10:15:22

Laura Wells, RPR, RMR, CRR, RDR

1 than anything else. I like, when I can, to draw clean
2 districts. And so that was one thing.

3 Another one was the five pickup opportunities. The
4 criteria for those -- should I just go on or do you want
5 to ask?

10:15:38

6 **Q.** Wait a minute.

7 **A.** Okay.

8 **Q.** You mentioned five pickup opportunities.

9 **A.** That's right.

10:15:42

10 **Q.** Can you tell the Court whether you had criteria for
11 drawing those -- well, wait a minute.

12 Let me ask you this: What do you mean by pickup
13 opportunities?

14 **A.** The five districts that Republicans could gain that we
15 currently did not hold in the 2026 midterms.

10:15:53

16 **Q.** Can you tell the Court whether you had criteria for
17 what those potential pickup districts would look like?

18 **A.** I did.

19 **Q.** What were they?

10:16:03

20 **A.** Yes. So all five of those new seats, the new pickup
21 opportunities -- I really shouldn't say "new," because two
22 of them already existed. So the three new pickup
23 opportunities plus the other two, so the five, at a
24 minimum, every single one of them had to be a district

10:16:21

25 that President Trump carried by ten points or more at a

1 process.

2 Generally, is that something you did when you drew the
3 Texas maps?

4 **A.** Yes. I equalized the populations when drawing the
5 maps, yes.

10:25:22

6 **Q.** All right. Since we're zoomed in to the Dallas-Fort
7 Worth area, let's start there in terms of how you drew it.

8 **A.** Yeah.

9 **Q.** Can you tell the Court where did you -- when you sat
10 down to draw the map or when you sat down to draw the
11 Dallas-Fort Worth area, did you start with District 30 or
12 33 or 32? How did you do that?

10:25:52

13 **A.** So --

14 MR. McCAFFITY: Objection, Your Honor, to the
15 extent it calls for expert testimony.

10:26:06

16 JUDGE GUADERRAMA: Yes, sir.

17 **A.** I started work on the DFW area in actually the
18 Panhandle.

19 BY MR. KERCHER:

10:26:14

20 **Q.** Did you say the Panhandle?

21 **A.** Yeah. Texas 13. That's right.

22 **Q.** Okay.

23 MR. KERCHER: Richard, can you zoom out -- and
24 let's turn off cities so the map looks a little cleaner.

10:26:23

25 And I guess we need to see the Panhandle.

1 a little bit further to the east -- in -- yeah, in Bowie
2 County. So I made sure that that -- that little carveout
3 there is the military installation. So I made sure that
4 was whole still in the 4th District.

10:36:14

5 **Q.** Okay. So in our efforts to understand how you drew
6 DFW, we're now in far northeast Texas. Can you bring us
7 back to DFW and tell us what happened next in that area as
8 the map drawer?

10:36:29

9 **A.** Sure. So the 3rd District was the next thing I had to
10 tackle. It had picked up a lot more Democrats in the
11 Plano area than it had had before. And so what I did is I
12 moved that east to pick up more Republican strength in the
13 more rural East Texas counties. And then from there
14 you'll note again, as I was doing throughout the area, the
15 border between 4, 3, and 32 is the city boundary of
16 Richardson.

10:36:45

17 MR. McCAFFITY: Objection. Move to strike based
18 on it's expert testimony.

19 JUDGE GUADERRAMA: Yes, sir.

10:36:59

20 **A.** Richardson is the purple that spans the border.

21 BY MR. KERCHER:

22 **Q.** So if we're looking at the southern border of Collin
23 County, we see the city of Richardson is in purple. And
24 we see a boundary then kind of pop up across that southern
25 Collin County border.

10:37:12

1 **Q.** Okay. Tell me how you -- tell me what you did next
2 with 15, sir.

3 **A.** Well, that's 15. What I wanted to -- what is helpful
4 to talk through is, again, you remember I start at
5 corners, right?

12:16:07

6 **Q.** Okay.

7 **A.** And so the next one would have been Texas 16, which is
8 the El Paso seat.

9 **Q.** So I'm sorry. I asked you about 35.

12:16:16

10 **A.** I know.

11 **Q.** And you took me down to Brownsville.

12 **A.** I did.

13 **Q.** And now you are taking me out to beautiful El Paso?

14 **A.** I am.

12:16:23

15 **Q.** Okay. I'm not the judge here, but you better get
16 there fast, sir.

17 **A.** Yeah.

18 **Q.** All right. Tell me about how drawing 16 in El Paso
19 wound up influencing how you drew 35.

12:16:34

20 **A.** Sure. So the 23rd District extends from El Paso all
21 the way to Bexar County. And so the 23rd District is held
22 by a Republican incumbent. And so what I needed to make
23 sure I did with the 23rd District is see that it would
24 stay at R plus seven or greater during the draw. So I had

12:16:54

25 to make sure that I was able to do that.

Laura Wells, RPR, RMR, CRR, RDR

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**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, et al.,
Plaintiffs,**

3:21-CV-00259-DCG-JES-JVB

v.

1:40 p.m. to 6:03 p.m.

**GREG ABBOTT, IN HIS OFFICIAL
CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS, et al.,
Defendants.**

OCTOBER 7, 2025

**INJUNCTION HEARING
BEFORE THE HONORABLE DAVID C. GUADERRAMA
THE HONORABLE JERRY E. SMITH
AND THE HONORABLE JEFFREY V. BROWN
AFTERNOON SESSION, DAY 6 OF 9 DAYS**

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14:16 1 Q. Go ahead.

2 A. Nothing.

3 Q. If you have anything else on Missouri, I'd love to hear it.

4 Now, how did you come to testify here today? Was that
5 voluntary? Are you here by subpoena? How did you get here?

6 A. Voluntary. Voluntary.

7 Q. And whose -- at whose request?

8 A. Um, I guess, Ryan and I talked about it a few weeks ago,
9 Ryan Kercher, and so -- yeah. Just kept -- part of an ongoing
10 conversation.

11 Q. Have you reached out to Mr. Kercher or had he reached out
12 to you?

13 A. I -- I don't remember that.

14 Q. It's possible that you reached out to him?

15 A. My attorneys might have. They were in touch with him,
16 so...

17 Q. Was it your idea that you would want to testify here in
18 court?

19 A. It wasn't my idea, but I was willing to do it.

20 Q. To your recollection, had the State reached out to you
21 first, or did you, through your attorney, reach out to
22 Mr. Kercher first?

23 A. I really don't recall how that got going.

24 Q. Now, you said in your direct that maybe back in, I think,
25 February or March, White House -- you were aware that people

14:18 1 were meeting with White House officials about Texas
2 redistricting. Is that right?

3 A. That's correct.

4 Q. Who -- which people were meeting with White House officials
5 that you were aware of?

6 A. Robin Armstrong.

7 Q. Anyone else?

8 A. Not that I'm aware of.

9 Q. Okay. And you mentioned that Robin Armstrong was going
10 around DC and asking about redistricting, and that each time he
11 would do that, he would be sent to you. Is that right?

12 A. That -- yes.

13 Q. About how many times did you have conversations with
14 Mr. Armstrong to that effect?

15 A. I had one primary conversation with Mr. Armstrong.

16 Q. And when was that?

17 A. I don't recall the exact date. I think it was in March.

18 Q. And when did you become aware that he was talking to folks
19 at the White House about Texas redistricting?

20 A. When he reached out to me.

21 Q. How long was that conversation?

22 A. Not very long.

23 Q. And how did you have that conversation? By phone, Zoom,
24 something else?

25 A. I believe he called me.

14:19 1 Q. And what did he say?

2 A. He said that he was -- no, he believed it was possible to
3 redraw the Texas Congressional Map to pick up more seats, and
4 that he had been talking to people in DC about it, and that he
5 kept being told to talk to me.

6 Q. Did he give any justification for why it was appropriate to
7 do mid-decade redistricting in Texas at that time?

8 A. I don't recall that specifically.

9 Q. He's the county commissioner in the Galveston County
10 Commissioners Court. Is that right?

11 A. That's correct.

12 Q. And did you know that about him prior to your conversation?

13 A. Yeah, yeah.

14 Q. And did you and he talk about the *Petteway* case in that
15 conversation?

16 A. I don't remember talking to him about *Petteway* in that
17 conversation, no.

18 Q. Okay. Have you talked to him about *Petteway* before?

19 A. It came up in a separate -- second conversation, yes, but
20 not the first one.

21 Q. All right. And what did he say about the *Petteway* case?

22 A. He -- he referred to it as a big win, and it gave them the
23 opportunity to redraw.

24 Q. Gave them the opportunity to --

25 A. Republicans the opportunity to redraw.

15:16 1 A. I had to fix Chip Roy's house, which now was fruitless, but
2 I had to do that.

3 Q. Anything else?

4 A. That's all I recall.

5 Q. And you said that was to Butler Snow?

6 A. Yep.

7 MR. GABER: Okay. If I could have Brooks Exhibit 253
8 pulled up, please, Mr. Dunn.

9 Q. (BY MR. GABER) Mr. Kincaid, I'm showing you what's been
10 admitted as Brooks Exhibit 253. Do you recognize this
11 document?

12 A. I do.

13 Q. And what is it?

14 A. It's a letter from the Department of Justice to
15 Governor Abbott.

16 Q. When did you first see this letter?

17 A. I don't recall that.

18 Q. Did you see a draft of the letter before it was released?

19 A. I did.

20 Q. When did you see that draft?

21 A. Probably the week before it was released.

22 Q. Who sent it to you?

23 A. It wasn't sent to me.

24 Q. How did you obtain it?

25 A. I didn't obtain it.

15:17 1 Q. How did you see it?

2 A. I was in the West Wing.

3 Q. Who showed it to you?

4 A. James Blair had it.

5 Q. And did you guys have a conversation about the contents of
6 the letter?

7 MR. STRACH: Objection, Your Honor, the same privilege
8 as to the DOJ that applies to the White House. It's executive
9 privilege.

10 JUDGE GUADERRAMA: All right. In relation to that, I
11 would say we looked at the case you cited. Didn't see that it
12 was entirely on point, and my clerk sent me this case, *United*
13 *States v. Reynolds*, saying the Supreme Court held, Executive
14 privilege belongs to the Government and must be asserted by the
15 head of the department involved, the White House. It can either
16 be claimed or waived by a private party.

17 That's *Halperin v. Kissinger*. It's 401 F. Supp. 272,
18 page 274. I think it's out of the DC, District Court, or
19 something out of 1975. So we're gonna look at that, and we can
20 continue the debate till we figure out what the law is.

21 MR. STRACH: Yeah. Our reading, Your Honor, of the
22 *Cheney* case is that the -- the privilege holder, like, i.e, the
23 President, DOJ, need not actually appear to invoke the
24 privilege -- and that it's a very broad privilege, particularly
25 in civil litigation. That's our view of it. We -- the Court may

15:21 1 you asking him to lodge an objection for you?

2 A. I'm asking him to lodge a -- it's still the same objection,
3 again.

4 MR. STRACH: Yeah. I'm good with him saying that he
5 spoke with me about it, but I'll object going any further than
6 that.

7 MR. GABER: Okay. So I just want to make sure I'm
8 clear.

9 JUDGE BROWN: I think the question, "Did you speak with
10 anyone else about the DOJ letter before it was released
11 publicly?" is a fair question.

12 Q. (BY MR. GABER) And so that was my question. And I don't
13 think you meant that you spoke with Mr. Strach, right?

14 A. No. I said "yes" to that, but then --

15 Q. Okay.

16 A. -- any follow-up questions, I was --

17 Q. Who did you speak to about the DOJ letter, aside from the
18 meeting that you had at the White House?

19 A. I -- I mean, there's -- let's see here.

20 I spoke to the Department of Justice about it.

21 Q. Who at the Department of Justice?

22 A. Um, Michael Gates.

23 Q. And he's one of the signatories to the letter. Is that
24 right?

25 A. He is.

15:22 1 Q. Did you speak to Ms. Harmeet Dhillon?

2 A. No.

3 Q. Anyone else at DOJ?

4 A. Maureen Reardon.

5 Q. And she's with the Voting Rights Section, right?

6 A. The voting section, yeah.

7 Q. Anyone else at DOJ that you spoke to about the letter?

8 A. No.

9 Q. Anyone other than people at DOJ did you speak to about the
10 letter?

11 A. Yes.

12 Q. Who else?

13 A. I'm not sure I can go into that.

14 Q. The identity of the person, I think --

15 A. So Governor Abbott.

16 Q. Anyone else?

17 A. Again, James Blair.

18 Q. And these are all before the letter was released, correct?

19 A. That's correct, yeah.

20 Q. Anyone else that you can think of?

21 A. Um, no, I think that's probably it. Might be others I'm
22 not remembering right now.

23 Q. What is your view of the DOJ letter?

24 A. My -- very complicated question. My view of the DOJ letter
25 is that it was not necessary.

15:44 1 it west in order to adhere to the footprint of the existing 30
2 and also make it the most Democrats seat.

3 Q. Now, my recollection was that you did not have any care for
4 core retention with respect to Democratic districts. Do I have
5 that right?

6 A. I said that -- well, if I said that, what I should have
7 said is I had less concern for that than I did in the
8 Republican seats. But, you know, 30 was a district that ran
9 from South Dallas County over to Tarrant, so I continued to
10 draw it south -- from South Dallas County over to Tarrant.

11 Q. Okay. Well, you would agree with me, right, that if your
12 goal was, as you said, to create CD30 as the most Democratic
13 district of the two, that there is -- where I have my mouse,
14 there's territory to the northeast that is in CD33 --

15 A. Uh-huh.

16 Q. -- that is, you know, apparently more Democratic than the
17 territory over in Tarrant County. Is that right?

18 A. It -- yes, it looks like it. But, again, I was using the
19 footprint of 30 as it currently existed.

20 Q. That wasn't part of your testimony with Mr. Kercher, right?

21 A. It should have been. I thought I said something like that,
22 that I took 30 along the southern border and into Tarrant
23 County. If I was less precise, then I will be more precise
24 now, that I kept 30 in its existing footprint and -- which I
25 think I did say -- and then what I'm pretty sure I said earlier

15:46 1 today was that I took the heavily-Democrat areas south of
2 downtown, put them all in the district, and then moved west
3 along the footprint of the existing Texas 30 into Tarrant
4 County.

5 Q. Well, let's do a little bit of experiment with the original
6 goals, which were to make the district the most Democratic.
7 And I'm going to delete -- I've unlocked CD30 and CD33. And so
8 I'm going to take out the Tarrant County portion of CD30.

9 Do you see that on the screen?

10 A. Yeah.

11 Q. And then do you also see that in southwestern Dallas
12 County, there are a number of VTD's that are significantly less
13 blue in their intensity of shading than the areas to the --

14 A. Sure, yes.

15 Q. So if we just delete some of these, and I'm going to turn
16 this on, so we can see the districts being deleted. And then
17 if we were to add the more Democratic area -- and I've now got
18 a substantially overpopulated district.

19 Do you agree with that?

20 A. I -- I assume so. I mean, I'm not accustomed to Dave's, so
21 let me look.

22 MR. GABER: Well, I guess, first, I need to put the
23 Tarrant County into 33. And continuing to give 30 the less --
24 sorry, the more Democratic areas -- I am using my cell phone as
25 the Internet source because I can't use the attorney Wi-Fi and

17:03 1 Q. (BY MR. McCAFFITY) Does it include -- does your -- when
2 you drew the map, you did not use race, according to your
3 testimony, on direct, right?

4 A. That's correct.

5 Q. But you acknowledge that the map was drawn as a political
6 process, start to finish, right?

7 A. That's correct.

8 Q. And you heard the chair of the Redistricting Committee on
9 the floor, Mr. Representative Hunter, talking about touting the
10 racial characteristics of four new districts that were
11 minority/majority?

12 A. I heard that, yes.

13 Q. Does that -- is it possible for your -- the use of race as
14 a political pretext to inform your decisions when you were
15 drawing partisanship to hit certain racial targets so they
16 could have that political talking point?

17 A. I wasn't using race to hit racial targets.

18 Q. How do we know you weren't using race?

19 A. Because I've said so multiple times.

20 Q. Who retained you again? The Republican National Committee?

21 A. That's correct.

22 Q. And you were paid for your map drawing services?

23 A. I -- it's a general retainer. It's not specific --

24 Q. How much?

25 A. I'm sorry?

17:51 1 Q. Okay. Now, I understand that vote returns are different
2 from demographic data, and I believe your testimony shows you
3 know that too.

4 You have demographic data in your system. Isn't that
5 right?

6 A. Let's be clear on what system you're asking about first.

7 Q. When you finish a map, you're able to produce a report, for
8 example, that says what is the Hispanic Citizen Voting-Age
9 Population of a particular district, correct?

10 A. That's correct, yeah.

11 Q. And that's because, somewhere in your system, you have ACS,
12 American Community Survey, Citizen Voting-Age Population
13 estimates by race and ethnicity pushed down to the block level.
14 Is that correct?

15 A. That's correct.

16 Q. And because you have the Texas voter file in your database,
17 you also have the Spanish surname flags on the individual
18 voters. Isn't that correct?

19 A. We don't use the SSVR data.

20 Q. No. I understand that you don't use it. I'm asking you
21 whether, because you have the voter file, you have the Spanish
22 surname flags that come with the voter file?

23 A. I would have to look. We get the voter file, like I said,
24 via list exchange agreement. That voter file is -- so I would
25 have to look. I've never used it. I've never looked at it.

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN § 3:21-CV-00259-DCG-JES-JVB
AMERICAN CITIZENS, ET AL §
§
V. § 9:01 A.M. TO 1:04 P.M.
§
GREG ABBOTT, IN HIS §
OFFICIAL CAPACITY AS §
GOVERNOR OF THE STATE OF §
TEXAS, ET AL § OCTOBER 8, 2025

PRELIMINARY INJUNCTION HEARING
BEFORE THE HONORABLE DAVID C. GUADERRAMA,
HONORABLE JERRY E. SMITH
AND HONORABLE JEFFREY V. BROWN
DAY 7 (MORNING SESSION) OF 9 DAYS

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1 Democratic district; is that right?

2 **A.** Yes.

3 **Q.** And then after that, some of it goes into District 18.

4 About 8 percent of the district is put in 18; is that

09:28:55

5 right?

6 **A.** Yes. I see that.

7 **Q.** And then the remainder goes into District 36; is that

8 right?

9 **A.** Yes. I see that.

09:29:03

10 **Q.** If we can go back to Exhibit 1381, comparing the two.

11 I'd like to ask, when you were drawing the new CD 9

12 you were aware, weren't you, that you were assigning

13 geography from 29 into 9, correct?

14 **A.** Yes.

09:29:32

15 **Q.** I'd like to go to Exhibit 1283, please.

16 MR. DUNN: I think Ms. Waknin can connect now, so

17 she has you.

18 MS. PERALES: If that is Exhibit 1283, if we

19 could go to page 8, please. If we can go back one page so

09:30:19

20 we can see information about CD 9. There we go.

21 BY MS. PERALES:

22 **Q.** So now, Mr. Kincaid, you'll recognize with me that the

23 left-hand column is for the districts in 2333.

24 Do you see that?

09:30:32

25 **A.** I do.

1 BY MS. PERALES:

2 **Q.** Now, Mr. Kincaid, we also see that the new 9 is made
3 up -- as we covered before, about 2.9, 3 percent of the
4 new 9 is made up of the old 9, correct?

09:34:00 5 **A.** Yes. That's correct.

6 **Q.** And that's about 85 percent Hispanic in that
7 population, correct?

8 **A.** That's what it says, yes.

9 **Q.** And now that it's bigger, we can actually see the
10 total population. It's fair to say then that the new 9 is
11 made up of, from District 29, 335,238 people, 80 percent
12 of whom are Hispanic, correct?

13 **A.** Yes. I see that.

14 **Q.** And then the new 9 is made up of a part of the old 9,
15 about 22,442 people who are 84.7 percent Hispanic,
16 correct?

17 **A.** Yes. I see that, too.

18 **Q.** When you were drawing the 2025 map, you knew that
19 Congressional District 29 was and is represented by Sylvia
20 Garcia; is that correct?

21 **A.** Yes.

22 **Q.** Now, during your direct examination you went over with
23 my friend Mr. Kercher some maps that were shaded in
24 different colors by precinct.

09:35:18 25 Do you remember that?

1 drew C2333 is adjacent to Congressional 36?

2 **A.** That's correct.

3 MS. PERALES: And if we zoom in to CD 14.

4 BY MS. PERALES:

09:46:10 5 **Q.** Is it fair to say that you drew CD 14 at Trump '24
6 general, 61.5 percent?

7 **A.** That's correct.

8 **Q.** I'd like to go now to Exhibit 1401, LULAC.

9 And I'll just ask you, Mr. Kincaid. You could have
09:46:40 10 created CD 9 at over 60 percent Trump, right, by swapping
11 precincts with CD 36?

12 **A.** I could have, yes.

13 MS. PERALES: We can take that exhibit down.

14 BY MS. PERALES:

09:46:56 15 **Q.** Isn't it also true, though, that if you had swapped
16 those precincts back and forth to make CD 9 60 percent
17 Trump, that your Hispanic CVAP would have dropped below
18 50 percent?

19 **A.** I don't know that. That's certainly possible. But I
09:47:11 20 wasn't targeting the Hispanic CVAP numbers.

21 **Q.** Let's go to Exhibit 1143 LULAC.

22 MS. PERALES: And if we could scroll down to the
23 ACS year ending 2023. We can look at the -- just the --
24 if we can zoom in to the top so Mr. Kincaid knows what
09:47:42 25 we're looking at here.

1 month, if I recall, yes?

2 **A.** I believe that's what I said, yes.

3 **Q.** And just so the Court understands, when you are

4 sitting at your computer and you are drawing a

09:57:46

5 redistricting map, you can set a color shading theme, as

6 we call it, to shade at, for example, the precinct level

7 or the block level for political results, correct?

8 **A.** That's correct.

9 **Q.** Now, when you, Adam Kincaid, are sitting there and you

09:58:11

10 set your color shading theme, are you using a single

11 contest, let's say Trump versus Harris '24; or are you

12 using an index?

13 **A.** One race.

14 **Q.** One contest. Okay.

09:58:26

15 So you, Adam Kincaid, are sitting in front of your

16 computer. You have got a shading on for this one contest.

17 And you are looking at the geography. And it's colored.

18 And then from there, you are selecting -- using your

19 mouse, you're selecting a geography. It could be a block.

09:58:49

20 It could be something else. And then you are assigning it

21 to a particular district number; is that correct?

22 **A.** Yes.

23 **Q.** Okay. So that's what you have in front of you.

24 I'd like to look at the maps that the State has marked

09:59:04

25 as exhibits. But before we do that, by way of

1 introduction to the maps that the State marked as
2 exhibits, you created these exhibits after you finished
3 drawing the map, correct?

4 **A.** I did, yes.

09:59:25 5 **Q.** All right. And you created them for the State, yes?

6 **A.** Yeah. I guess so.

7 **Q.** For the State defendants. I should be more clear.

8 **A.** Sure.

09:59:43 9 **Q.** These exhibits that we're about to look at, they are
10 not screenshots of what you were looking at that you took
11 while you were mapping; is that correct?

12 **A.** That's correct. I'm not in the habit of taking
13 screenshots while I'm drawing maps.

09:59:58 14 **Q.** There are probably teachers in the past who used to
15 say show your work, but that's not what we're about to
16 look at, correct?

17 **A.** I actually would love to live stream my drawing. It
18 would make a lot of this all much easier, so...

10:00:10 19 **Q.** You could create an entire community of people who are
20 really into redistricting who would want to watch that.
21 Perhaps some of my friends over there as well.

22 **A.** I can think of a few.

23 **Q.** Okay. So let's go ahead and start then looking at
24 these maps. Let's show State 1530.

10:00:39 25 Now, Mr. Kincaid, these exhibits as we received them

1 BY MS. PERALES:

2 Q. Mr. Kincaid, we have the benefit of seeing the file
3 name for the exhibits that I'm about to show you.

4 A. Okay.

10:02:39 5 Q. And luckily for us, in the file name of the exhibit is
6 the numerical cut number --

7 A. Oh, great. Okay.

8 Q. -- that you used. So although it's not on the
9 exhibit, it is in the file name. And I will put them here

10:02:58 10 on the whiteboard --

11 A. Great.

12 Q. -- for you as we walk through.

13 A. Okay.

14 Q. So for State Exhibit 1530, the cut number is

10:03:10 15 29.1 percent.

16 A. Okay.

17 Q. Does that seem familiar to you?

18 A. I'll take your word for it.

19 Q. And now if we could show LULAC 1384. This is not a

10:03:33 20 State exhibit. This is just one of ours. We decided to

21 use the same overlay, but use a different cut, which is
22 50 percent.

23 A. 50 percent. Okay.

24 Q. Yes.

10:03:43 25 And so if we're looking at 1384, I'll represent to you

1 that instead of white lines, the district boundaries are
2 black lines.

3 **A.** Got it.

4 **Q.** Do you see that there?

10:04:00

5 **A.** I do.

6 **Q.** Okay. Now let's go to State 1531. This is in Bexar
7 County.

8 MR. KERCHER: (Turning screen.)

9 MS. PERALES: Mr. Kercher, you are a lifesaver.

10:04:23

10 BY MS. PERALES:

11 **Q.** So we see here this is your -- this is the shading
12 that you prepared for State defendants. The file name
13 says 30 percent.

14 Does that seem familiar to you on that cut?

10:04:33

15 **A.** Yes. I think that's what I said yesterday, too.

16 **Q.** Thank you.

17 And now we're going to go to LULAC Exhibit 1385.

18 Again, we're always going to use the 50 percent cut

19 number. And, again, the district boundaries are black

10:04:59

20 lines here. So then this would be Bexar County showing
21 the precincts that were either majority for candidate
22 Trump or majority for candidate Harris.

23 Do you see that there?

24 **A.** I do.

10:05:10

25 **Q.** Okay. Let's go now to State 1532. This is Dallas and

1 Tarrant County. The following says the cut number here is
2 40 percent.

3 Does that sound familiar?

4 **A.** Yeah. That looks right for this map.

10:05:44

5 **Q.** Now, Mr. Kercher is telepathically making my
6 handwriting very bad after I criticized his Texas. So I
7 apologize for the funky-looking numbers there.

8 Let's go to LULAC 1386. Again, this is the same area,
9 Dallas; and the numerical threshold is at 50 percent.

10:06:15

10 Do you see that there?

11 **A.** I -- yes. I see that. I don't see where it says
12 50 percent, but I see that that's the same area, yes.

13 **Q.** Thank you.

10:06:34

14 Let's go to State 1533. This is another part of
15 Harris County. This time the file name says the cut is at
16 35 percent.

17 Do you happen to remember that?

18 **A.** Yes. That makes sense.

10:06:51

19 **Q.** This is our second Harris County map. This one I
20 believe was named East Harris.

21 **A.** Yeah. It's eastern Harris. Yes.

22 **Q.** And just so we can observe, I notice with the cut that
23 you selected for this one, 35 percent, there is kind of a
24 nice following of the boundary of CD 9 along the edge of
25 CD 18.

10:07:19

1 That lines up pretty well, doesn't it?

2 **A.** It does, yes.

3 **Q.** It does. Okay.

4 Let's go to LULAC 1387. Again, using a 50 percent
5 cut.

10:07:33

6 Now we see that the boundary between 9 and 18 is
7 carving through majority Harris precincts; is that
8 correct?

9 **A.** Yes.

10:07:46

10 **Q.** Let's go next to State 1534. This is El Paso. And
11 you chose a 50 percent in the file name.

12 **A.** That's easy for everybody. This is El Paso.

13 **Q.** We didn't do another map for El Paso because the
14 50 percent would have looked exactly the same, just the
15 boundaries would have been not white but black.

10:08:10

16 Okay. Moving on. Let's look at State 1535. This is
17 the file name of Fort Bend and southwest Harris County.
18 The cut in the file name here is at 44 percent.

19 Do you recall that?

10:08:38

20 **A.** Yes.

21 **Q.** And then if we go to LULAC 1388, we see the district
22 boundaries now superimposed over a 50 percent threshold.

23 Do you see that?

24 **A.** Yes.

10:09:03

25 **Q.** Next is State 1536, north Dallas County. The cut

1 threshold in the file name that you chose for this one is
2 40 percent.

3 Do you remember that?

4 **A.** Yeah. This looks like 40 percent, yes.

10:09:32

5 **Q.** And then if we could look at LULAC 1389, this is the
6 same area, with a 50 percent cut.

7 Do you see that there?

8 **A.** I see that.

10:10:01

9 **Q.** Let's go to State 1537. This is going to be -- this
10 was labeled North Houston 42.9 percent.

11 Do you recall setting a 42.9 percent threshold?

12 **A.** For this map, yes.

13 **Q.** Thank you.

10:10:37

14 And then LULAC 1390, this is the 50 percent threshold
15 here. Do you see now that the line, especially between 29
16 and 18 here, cuts through majority Harris precincts in
17 this map?

18 **A.** Sure. Yeah.

10:11:13

19 **Q.** Let's go to State 1538. And this is Nueces County,
20 Corpus Christi. The file name says you chose the cut
21 threshold at 38.7.

22 Do you remember that?

23 **A.** Yes.

10:11:38

24 **Q.** And we see that the line boundary here on the district
25 lines up pretty well with a 38.7 threshold. That's right?

1 **A.** It does.

2 **Q.** And now let's go to LULAC 1391. That's using a
3 50 percent threshold.

10:11:58

4 Would you agree with me that in this map, which is
5 LULAC 1391, the boundary of -- this is actually District
6 27 dipping into 34, that that boundary is dividing
7 majority Harris precincts from each other?

8 **A.** Yes.

10:12:26

9 **Q.** Let's go to State Exhibit 1539. The file name we have
10 for this one is South Dallas 20 percent.

11 Do you remember using a 20 percent threshold for this?

12 **A.** Yes.

13 **Q.** And now if we go to LULAC 1392, this is using a
14 50 percent threshold.

10:12:53

15 Do we see the boundary here that shows in black
16 cutting largely through Democratic precincts?

17 **A.** Yes. I see that.

18 **Q.** There is only three more, Mr. Kincaid.

19 **A.** That's all right.

10:13:12

20 **Q.** State Exhibit 1540. This is also marked South Dallas
21 County in the file name, but the cut here is 40 percent.

22 Do you recall using a 40 percent cut in this map?

23 **A.** Yes.

10:13:46

24 **Q.** Same geographic area, though, as the previous map,
25 correct?

1 **A.** Yeah. I'm not sure why it's using that.

2 **Q.** And then if we could show LULAC 1393.

3 Again, I believe the observation would be the same as
4 the last map.

10:14:01 5 **A.** Yes.

6 **Q.** The boundary here is cutting through Democrat -- it's
7 dividing Democrat precincts from Democrat precincts for
8 this contest, Kamala Harris, yes?

9 **A.** Sure. Yes.

10:14:13 10 **Q.** If we could go to State 1541. This file name is
11 Travis County 30 percent.

12 Do you recall using a 30 percent threshold for this
13 map?

14 **A.** Yes.

10:14:32 15 **Q.** And then if we can go to LULAC 1394. It looks here,
16 if you would agree with me, that the boundary line using a
17 50 percent threshold, meaning majority Trump or majority
18 Harris, that the boundary here cuts through district -- or
19 precincts that are majority Harris; is that right?

10:15:04 20 **A.** Yes. This definitely looks like the Austin area.

21 **Q.** It does look like Austin, doesn't it?

22 Okay. Last map. State 1543. This file name is also
23 Harris, but it's -- the cut is at 31 percent.

24 Do you recall using a 31 percent threshold for this?

10:15:26 25 **A.** Yes.

1 **A.** That's correct.

2 **Q.** And then as you are assigning geography into and out
3 of the district, with each change you are able to see the
4 change that it has, not just on total population but also
10:19:26 5 on percent returns for Mr. Trump, Mr. Cruz, and
6 Mr. Abbott, correct?

7 **A.** Yes.

8 **Q.** You had something like that going on when you were
9 mapping?

10:19:33 10 **A.** I did.

11 **Q.** Okay. And then finally, if you had citizen voting age
12 population by race on your platform --

13 **A.** Uh-huh.

14 **Q.** -- you could also set it up in that box so that every
10:19:47 15 time you moved geography into and out of the district,
16 even if you are using shading on political performance,
17 you could watch those numbers changing as you are adding
18 or taking out geography with respect to, for example,
19 Hispanic citizen voting age population?

10:20:04 20 **A.** You could do that, yes.

21 **Q.** One more question about your mapping.

22 You said in response to a question from Mr. Gaber that
23 you got your election results from the Texas Legislative
24 Council; is that correct?

10:20:23 25 **A.** Yes.

1 Let's talk about the unified map that you drew in
2 Harris County.

3 **A.** Yeah.

10:22:57

4 **Q.** If we could show LULAC 1396. And just to be clear,
5 we're talking about the unified map in Harris County.

6 **A.** Okay.

7 **Q.** If you just look at the blue boundary outlines, does
8 this look like the unified map to you?

9 **A.** It does.

10:23:19

10 **Q.** I'll represent to you that those are the boundaries
11 overlaid on top of C2333.

12 Do you recognize that?

13 **A.** Yes.

10:23:37

14 **Q.** I just wanted to make sure I got my oranges
15 straightened out before I said that to you.

16 So in the unified map, we see a configuration of CD 29
17 that has a piece in the north side of Houston and then it
18 has another piece that's to the south and to the east.

19 Do you see that?

10:24:02

20 **A.** I see that, yes.

21 **Q.** I know that when we work with maps, sometimes we make
22 up names for the different shapes. I always thought of
23 your version of 29 here as a lady walking with a candle.
24 She is walking to the west. She is holding a candle in
10:24:20 25 her arms. And she has a long dress flowing behind her.

1 said you disagreed with the classification of all those
2 districts; is that correct?

3 **A.** I believe what I said was that I agreed that Texas 9,
4 18, and 33 were coalition seats and disagreed that
5 Texas 29 was a coalition seat. I believe that's what I
6 said.

7 **Q.** Okay. And you said Texas 29 was a Latino majority
8 seat?

9 **A.** I didn't say that. Ms. Perales did. But yes.

10 **Q.** What did you say? You said something yesterday. I
11 thought you --

12 **A.** I think I agreed -- actually, I think I agreed with
13 Mr. Gaber when he said it was a majority Hispanic seat.
14 Something like that. But yes. I agreed that Texas 18 --
15 29 is a majority Hispanic seat under the last map.

16 **Q.** And 29 was a district where Latinos were able to elect
17 their candidate of choice, correct?

18 **A.** It was a majority Hispanic district, yes.

19 **Q.** I know majority Hispanic. Not all majority Hispanic
20 districts do that.

21 So my question is, it was able to elect the Latino
22 candidate of choice, correct?

23 **A.** Sure. Yes.

24 **Q.** Okay. So let's talk about the four districts here.

25 So we're talking about Congressional District 9 to begin

1 50 percent Black CVAP. Is that what you are saying?

2 **Q.** Right.

3 **A.** I want to clarify what you said before.

4 **Q.** You changed it to over 50 percent BCVAP.

11:36:51

5 **A.** Well, it was a 50. It is a majority Black CVAP seat,
6 yes, as drawn.

7 **Q.** All right. But it still will function the same,
8 correct, electing an African American candidate of choice?

9 **A.** It will, yes.

11:37:03

10 **Q.** And you knew at the time you made the changes that if
11 you look at the combined populations for 9 and 18, they
12 were predominantly African American and Latino; is that
13 correct?

14 **A.** I did not look at the demographics of the district
15 while I was drawing them, no.

11:37:17

16 **Q.** But you knew them, right? You didn't have to look at
17 the demographics because you knew it.

18 **A.** I knew it was a heavily African American area, yes.

19 **Q.** So now if we go to Congressional District 29 here that
20 you just talked about and you've indicated that Latinos
21 elected their candidate of choice, what you are saying is
22 you took no measure to protect this district in your
23 configurations of the methodology you used in redrawing
24 the district; is that right?

11:37:33

25 **A.** That's correct. I reconfigured the four Democrat

11:37:45

1 **A.** Yes.

2 MR. FOX: Thank you very much. No further
3 questions.

4 JUDGE GUADERRAMA: Plaintiff? Anyone else?

12:38:11

5 (No response.)

6 JUDGE GUADERRAMA: All right. Mr. Kercher.

7 MR. KERCHER: The Court knows how truculent I
8 like to be. Nevertheless, no redirect.

9 May this witness be excused?

12:38:25

10 JUDGE BROWN: I think I have a few. I know he is
11 trying to get out of here, but just real quick. And I
12 think most of this is just going to be a little bit of
13 clarification for me.

14 When you drew the 2025 map, did you know that CDs 9,
15 18, 29, and 33 under the 2021 map were considered minority
16 opportunity districts, in that they provided minorities an
17 opportunity to elect candidates of their choice?

12:38:39

18 THE WITNESS: I did.

19 JUDGE BROWN: And in 2020 and 2024, in at least
20 some parts of the state, President Trump did better among
21 Hispanic voters than Republicans typically do. Aside from
22 those instances, are you aware that Hispanics -- that a
23 comfortable majority of Hispanics in Texas vote in favor
24 of Democrat candidates, though not as cohesively and
25 overwhelmingly as Black voters?

12:38:59

12:39:19

1 **A.** Yes, I have.

2 **Q.** What is it?

3 **A.** This document was created by our office, the Secretary
4 of State's office. We provide a list typically on a
5 two-year cycle of all of the upcoming important dates
6 related to upcoming elections. We do that prior to
7 issuing a more detailed calendar for each election.

12:56:27

8 MS. THORBURN: Okay. Richard, if you could,
9 maybe -- we need to look at this page and the next page.

12:56:52

10 Great.

11 BY MS. THORBURN:

12 **Q.** Ms. Adkins, just on a high level, running through each
13 of these dates, could you just explain to the Court the
14 process going from precinct chair filing to the primary
15 election?

12:57:02

16 **A.** So our primary election is scheduled for March 3rd of
17 2026 this next year. Prior to the primary election taking
18 place, there is a number of very relevant dates and
19 deadlines that pertain specifically to candidacy.

12:57:16

20 The first date that you have -- on the list that you
21 provided here, Tuesday, September 9th, 2025, that is the
22 first day of the filing period for individuals that are
23 applying for a party office. And that's the office of
24 precinct chair.

12:57:31

25 The next date that's listed on this calendar is

1 Saturday, November 8th, 2025. That is the first day of
2 the filing period for candidates that are primarily
3 seeking public office. That's the big filing period start
4 date. That filing period takes place for about 30 days.

12:57:48

5 And the final date for which a person can submit an
6 application for seeking the nomination in the primary
7 election process, if we're speaking about primaries
8 specifically, is Monday, November -- I'm sorry -- Monday,
9 December 8th, 2025.

12:58:03

10 **Q.** So am I correct that Tuesday, September 9th, was about
11 a month ago?

12 **A.** That's correct.

13 **Q.** And the November 8th date, would that apply to
14 congressional candidates?

12:58:15

15 **A.** Yes. That's correct.

16 **Q.** How do the deadlines that you just described interact
17 with each other?

18 **A.** So we have deadlines in the election code that are
19 keyed off of our election date, where we count backwards
20 from our election date.

12:58:30

21 And then we've got a number of deadlines, and I think
22 these are a good example of those, that are set by
23 statute. And they are set not keyed off of the election
24 date itself but are defined in Texas law.

12:58:43

25 These -- the deadlines for an election kind of all

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**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, et al.,
Plaintiffs,**

3:21-CV-00259-DCG-JES-JVB

v.

1:38 p.m. to 6:02 p.m.

**GREG ABBOTT, IN HIS OFFICIAL
CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS, et al.,
Defendants.**

OCTOBER 8, 2025

**INJUNCTION HEARING
BEFORE THE HONORABLE DAVID C. GUADERRAMA
THE HONORABLE JERRY E. SMITH
AND THE HONORABLE JEFFREY V. BROWN
AFTERNOON SESSION, DAY 7 OF 9 DAYS**

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14:36 1 Q. What is the deadline? When is the last time that they can
2 file?

3 A. The last date that they can file? The final date for
4 precinct chair applications aligns with the public filing
5 period, and that is in December, December 8th.

6 Q. December 8th?

7 A. Mm-hmm.

8 Q. So, in fact, although the period is open now, precinct
9 chairs have until December 8th to decide which precinct they
10 would like to sign up to run in. Is that right?

11 A. That's correct.

12 Q. All right. You mentioned -- I think I heard you say
13 counties are already getting ready to implement new district
14 boundaries. Is that what you said?

15 A. Yes, ma'am, that's correct.

16 Q. But the counties are using the same precinct boundaries
17 that they have now for the upcoming November 4th election.
18 Aren't they?

19 A. That's correct. That -- I mean, it's the same way it
20 worked in 2021. There are a number of activities that counties
21 will do to prepare for final implementation of their voter
22 registration precincts. They're looking at maps now. They're
23 doing the overlay of different districts. And they're already
24 making determinations on how to adjust their voter registration
25 precincts.

14:37 1 Q. But they're not adjusting their voter registration
2 precincts yet. Are they? Because they have an upcoming
3 November 4th election. Isn't that right?

4 A. That's correct. That information will be, I think,
5 formally entered into their systems immediately following that
6 November election.

7 Q. Well, following the November election, perhaps, is a more
8 accurate way to put it.

9 Let's look here at the Governor's April 7 proclamation
10 of a special election in Congressional District 18. Do you see
11 that?

12 A. I do.

13 Q. And then here is the proclamation, its -- what is the
14 biggest county in Texas?

15 A. That would be Harris County.

16 Q. And this special election for Congress is running in Harris
17 County. Isn't that right?

18 A. Yes, ma'am, that's correct.

19 Q. And that's going to be under the 2021 map. Isn't that
20 right?

21 A. Yes, ma'am, that's correct.

22 Q. Do you know how many candidates have filed to run for
23 Congressional District 18?

24 A. I think it's about 16 candidates.

25 Q. That's the number I have as well. You have some experience

14:38 1 with elections in your years at the Secretary of State's
2 office. What is your estimate on the likelihood that we're
3 going to have a runoff in that election?

4 A. I would think that there's a pretty high degree of
5 certainty that we will have a runoff in that election. Not --
6 it's not a guarantee. I've seen strange things happen before,
7 but with a candidate pool that large, it is very possible we're
8 going to have a runoff.

9 Q. I don't disagree with you there.

10 So what that means, technically, is that Harris County
11 is going to have to keep its voter precinct boundaries under
12 the current plan. Not just its district boundaries, but its
13 voter precinct boundaries, the same, according to the 2021 plan
14 until that process comes to a conclusion, including any runoff
15 election. Is that right?

16 A. That's correct. They would not be modifying those
17 districts formally in their system until after that election
18 has concluded.

19 Q. Okay. You mentioned with my friend, Ms. Thorburn, that the
20 effect of an injunction on the voters -- and I just wanted to
21 make clear with you, the lines that we have today are from the
22 map passed in 2021, correct?

23 A. That's correct.

24 Q. So what the voters know in terms of their district
25 boundaries comes from the 2021 map, correct?

14:40 1 A. Well, I think it would depend on the voter.

2 Q. Perhaps.

3 A. I think some voters -- you know, if they're looking at
4 older information or looking at past elections -- are probably
5 familiar with those previous lines. But individuals that might
6 be following this process along may be aware that new lines
7 have been adopted, particularly as they interact with
8 candidates.

9 Q. That's a good point. But in terms of the lines under which
10 they most recently voted, those are the lines from the 2021
11 map. Is that right?

12 A. That's correct.

13 Q. Okay. So would you agree with me, then, that the, quote,
14 unquote, Effect of an injunction on the voters would be to
15 maintain the same district boundaries and precinct boundaries
16 under which they last voted?

17 A. I would say the effect on the voter, as far as process and
18 procedure, you know, where they are -- what their voter
19 registration precinct actually is, that's -- well, let me
20 rephrase that.

21 I think there's different effects on voters.

22 Q. I am asking you specifically about this effect. Would you
23 agree with me that the effect of an injunction on the voters
24 would be to maintain the same precinct boundaries and district
25 boundaries for Congress under which they last voted?

14:41 1 A. I understand what you're asking now, yes. But I would also
2 add that that could still be the same precinct under the new
3 lines as well.

4 Q. Might be. And if candidates were really smart in
5 collecting signatures, they would collect signatures in the
6 overlap area between the two districts. Wouldn't they?

7 A. That's possible.

8 Q. Okay. I'm not a math person. I'm not gonna talk about
9 Venn diagrams, but I think there's something in there about
10 that.

11 The last thing I wanted to talk with you about was
12 something you started your testimony with, which has to do with
13 the Spanish-surname flags in the Secretary of State's voter
14 file.

15 You mentioned -- and I just want to make it clear for
16 the Court so they are not misled. There -- would you agree
17 with me that in the Texas voter file, there is either a flag or
18 not a flag next to someone's name under this column for
19 Spanish-surname?

20 A. Well, I'm not sure what you mean by a flag, per se. But I
21 think that there's a way to generate a report that identifies
22 those surnames as identified, you know, under the previous
23 census -- or rather using that name from the census.

24 But I don't know if I would call it a flag.

25 Q. And we don't have to call it a flag. We can just call it

14:57 1

CROSS-EXAMINATION2 **BY MR. BLEDSOE:**

3 Q. Good to see you again.

4 A. Yes, sir.

5 Q. Thank you for your hospitality when I went to visit with
6 you guys.

7 A. Yes, sir.

8 Q. I have a couple questions here. First of all, I'd like to
9 ask if it's true, is it not, that, in terms of the current map,
10 C2193, the system is all set to move forward in terms of the
11 precinct boundaries?

12 They don't need to be changed, correct?

13 A. You're talking about with the -- these 2025 maps, or are
14 you talking about the previous --

15 Q. 2021.

16 A. 2021. That's correct. Those changes were made to conform
17 to those maps after the end of 2021.18 Q. Okay. And, in fact, when you change boundaries for
19 Congress, this impacts boundaries for other offices. Is that
20 correct?21 A. If you change the maps, the boundaries for congressional
22 offices, it can affect the boundaries for voter registration
23 precincts.

24 Q. Okay. Well -- yes. But what I'm asking you is this.

25 Let's say -- I think state law requires that for any office,

15:13 1 Q. Okay. I'm so looking forward to using this phrase. We
2 used it in the SB1 case. "Let's talk about the big boys."

3 A. Okay.

4 Q. Those are -- that is the colloquial term used for our
5 bigger counties. Is that right?

6 A. Yes, sure.

7 Q. And the big boys would include Dallas and Tarrant, correct?

8 A. Among others, Dallas, Tarrant, Harris. Depends on how we
9 define these extra-large counties.

10 Q. Travis, Bexar, El Paso?

11 A. Potentially, yes. Uh-huh.

12 Q. And some of our big suburban counties, Williamson,
13 Montgomery as well. Is that right?

14 A. They could be in that category.

15 Q. Would it be fair to say that for most of the big boys, they
16 are using computers to enter the new precinct boundaries and
17 district boundaries so that they can get their voters into the
18 right precincts?

19 A. I think there -- it's possible. I mean, when I spoke to
20 Harris County last week about this, they did indicate that they
21 were using GIS and that they'd already -- they'd already made
22 most of those determinations.

23 Q. But they can't put people -- they cannot use their computer
24 to put people into new precincts or districts until not only
25 after the November 4 election, but after any potential runoff.

15:14 1 Is that correct?

2 A. I don't know that I agree with that, because, in thinking
3 about this race -- the Representative Vela race that we did in
4 2022, we worked with those counties to find a way to enter that
5 into kind of -- I think we were using a test environment in our
6 system so that they could implement changes to move forward
7 with redistricting requirements. But they were able to still
8 process and run that election on old lines.

9 So I think, depending on the system, there is a way to
10 have those precincts implemented in a way you can utilize that
11 information effectively. It just depends on the circumstances
12 of that county and the need for it. And --

13 Q. So what you're describing in that situation was that the
14 county was able to toggle between the two sets of lines. Is
15 that right?

16 A. I wouldn't call it a toggle, but we were able to work with
17 them because they utilized our system, those counties. We were
18 able to provide a way for them to generate the list based off
19 of their older lines when they were doing that special
20 election. So there's -- there are ways to maintain both sets
21 of information.

22 Q. Understood. And have you had a conversation specifically
23 with Harris about its ability to have, in its computer system,
24 the current lines, which it needs for November 4, and any
25 potential runoff, and then being able to essentially have

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**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, et al.,
Plaintiffs,**

3:21-CV-00259-DCG-JES-JVB

v.

1:38 p.m. to 6:22 p.m.

**GREG ABBOTT, IN HIS OFFICIAL
CAPACITY AS GOVERNOR OF THE
STATE OF TEXAS, et al.,
Defendants.**

OCTOBER 10, 2025

**INJUNCTION HEARING
BEFORE THE HONORABLE DAVID C. GUADERRAMA
THE HONORABLE JERRY E. SMITH
AND THE HONORABLE JEFFREY V. BROWN
AFTERNOON SESSION, DAY 9 OF 9 DAYS**

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14:37 1 Session?

2 A. I will accept your representation on that.

3 MS. PERALES: Let's go to Exhibit 1410, please.

4 Q. (BY MS. PERALES) And, Dr. Trende, I'll represent to you
5 that this is a similar approach to adopting your color shading.
6 And if we go into that same area, as you described, to the left
7 of the epiglottis, would you notice with me that there are a
8 few precincts that are 30 to 40 percent for candidate Trump
9 that now fall on the non-CD9 side of the boundary between CD9
10 and CD18?

11 A. Yeah, it looks that way.

12 Q. Okay. And do you understand Plan C2333 to be the final
13 adopted map?

14 A. Yes.

15 Q. Let's go to page 27 of your report. And I'll read you --
16 wow. Okay. I'm gonna read you the -- the sentence and see if
17 you can find it on the page. It's a part of a sentence, I
18 think.

19 A. I'm sorry, did you say 27?

20 Q. Yes.

21 MS. WAKNINS: Oh. Apologies, Ms. Perales.

22 MS. PERALES: My apologies.

23 Q. (BY MS. PERALES) So, Dr. Trende, you have your report. If
24 you could go to page 27, and if you could find the language for
25 me --

14:39 1 MS. PERALES: And then maybe Ms. Waknin could zoom in.
2 Q. (BY MS. PERALES) "The transformation from C2331 to C2333
3 grew into a complex chain of events involving almost 700,000
4 residents in 12 districts, 667,000 of whom lived in the Houston
5 area."

6 Do you see that language there?

7 A. Yes.

8 Q. And, in your report, you present your ideas about the steps
9 in modifying these districts, from C2331 to C2333. That's on
10 page 28, including what you describe as population swaps
11 between Districts 9, 14, 22, and 36. The addition of Liberty
12 County to CD29. Smoothing district edges. And removing a
13 county split, among others. Is that right?

14 A. Yes.

15 Q. And then you say, "This chain of events continues for quite
16 some time." Is that right?

17 A. Yes.

18 Q. And you will agree with me that through all of these steps
19 and the chain of events, as you describe it, the Hispanic
20 Citizen Voting-Age Population of CD9 remains very similar,
21 changing only from 50.5 percent in 2331 to 50.3 percent in
22 2333. Isn't that right?

23 A. That's the chain, yeah.

24 Q. And so with all of these changes in the drawing process,
25 from 2331 to 2333, moving geography, smoothing edges, adding

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TRANSCRIPTION OF VIDEOTAPE
TEXAS HOUSE OF REPRESENTATIVES
COMMITTEE ON CONGRESSIONAL REDISTRICTING
Friday, August 1, 2025



1 stakeholders who testified during the field
2 hearings testified that the population of Black
3 voters in the state did not have proportionate
4 representation.

5 REP. HUNTER: Oh, throughout the
6 state, yes.

7 REP. PIERSON: Yes.

8 Well, this current map that you
9 have submitted actually shows where there's not
10 just one but two majority Black CVAP districts
11 drawn on this map; is that true?

12 REP. HUNTER: That is correct.

13 And let me give everybody details. CD 18 is
14 now 50.8 percent Black CVAP; in 2021 it was
15 only 38.8 percent. CD 30 is now 50.2 percent
16 Black CVAP; in 2021 it was 46 percent.

17 REP. PIERSON: So that's two
18 Black CVAP districts. How many Black districts
19 are there on the current map?

20 REP. HUNTER: I don't have all
21 the counts on that.

22 REP. PIERSON: The answer is
23 zero. So, overall, Black voters in the state
24 of Texas go from zero to two majority Black
25 CVAP seats out of the 38 seats in Texas; is

1 that accurate?

2 REP. HUNTER: It's accurate, but
3 I want to add: Whether you're Republican or a
4 Democrat, under this plan, you can win. And
5 whether you're Asian, African/American, Anglo,
6 Latino, Latina, Hispanic, anybody can run and
7 win; but you're correct on the calculation.

8 REP. PIERSON: Okay. So it
9 would be fair to say that your proposed map
10 directly resolves many of the concerns that
11 were expressed during those field hearings in
12 your proposed map and would, in fact,
13 strengthen minority representation in our
14 state. Would you agree?

15 REP. HUNTER: The answer is,
16 "Yes." But let me add, for the members and
17 those listening, the answer is, "Yes." But we
18 did create five new districts that lean
19 partisan Republican. So I do want everybody to
20 know: "Yes," we have done those things; and
21 we've done the partisanship.

22 REP. PIERSON: Thank you,
23 Chairman.

24 CHAIRPERSON VASUT: I think we
25 had -- Representative Manuel, for what purpose?