No. 25A839

IN THE

Supreme Court of the United States

DAVID TANGIPA, *et al.*,

Applicants,

v.

GAVIN NEWSOM, *in his official capacity as the Governor of California, et al.*,

Respondents.

APPENDIX TO DCCC'S RESPONSE IN OPPOSITION TO APPLICANTS' EMERGENCY APPLICATION FOR AN INJUNCTION PENDING APPEAL

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Preliminary Injunction Hearing Transcript Excerpts

09:06:08 UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

HONORABLE JOSEPHINE L. STATON, U.S. DISTRICT JUDGE

HONORABLE WESLEY L. HSU, U.S. DISTRICT JUDGE

HONORABLE KENNETH KIYUL LEE, U.S. CIRCUIT JUDGE

DAVID TANGIPA, et al., Plaintiffs, vs. GAVIN NEWSOM, et al., Defendants.	2:25-CV-10616-JLS-WLH-KKL

REPORTER'S TRANSCRIPT OF HEARING

AM Session

Los Angeles, California

Monday, December 15, 2025

AMY DIAZ, RPR, CRR, FCRR
Federal Official Reporter
350 West 1st Street, #4455
Los Angeles, CA 90012

Please order court transcripts here: www.amydiazfedreporter.com

09:54:53 use dot density maps to actually draw a map. When you go
09:54:58 into Maptitude, which is what I used in *Belize*, or you go
09:55:02 into Dave's Redistricting, you have a choropleth map in front
09:55:05 of you that is shaded by race or by politics.
09:55:08 So if you are going to try to figure out what the
09:55:09 mapmaker is doing, I think it's better to depict the data in
09:55:13 terms of what the mapmaker sees.
09:55:15 There is some other problems with dot density maps
09:55:19 that are in the report, but that is the gist of it.
09:55:21 Q. Dr. Rodden also says that you failed to look at the
09:55:24 voters removed from the district versus the voters put back
09:55:28 into the district. Is this a valid critique?
09:55:31 A. Well, it can be. And so it's something that actually in
09:55:35 retrospect I wish I had looked more carefully at the first
09:55:39 time around. Because it actually rather proves, I think, the
09:55:42 plaintiffs' point.
09:55:43 Because what happens in the southern boundary is a
09:55:47 hundred thousand residents get taken out with the given
09:55:55 HCVAP, and then the 100,000 residents who get put back in at
09:55:59 the opposite end of the district have almost the exact same
09:56:04 HCVAP as the voters that are taken out. It's exactly what
09:56:07 you would do if you were trying to maintain a certain level
09:56:09 of Hispanic citizen voting age population in the district.
09:56:14 And so when you do this full district analysis that
09:56:16 Dr. Rodden points to, you actually get important context for

09:56:20 why that district, when it's going up through Stockton,
09:56:24 passes by this nice area of highly Democratic voters that
09:56:28 have low Hispanic citizens voting age population, to grab
09:56:34 this area of voters, and different Census designated places
09:56:38 that doesn't perform as well. It's to balance out that
09:56:41 racial target to keep the district's HCVAP from falling. And
09:56:47 we see this in the illustrative maps, as well.
09:56:47 Q. So just to ask a couple questions. The former
09:56:49 Congressional District 13 that was drawn by the Commission,
09:56:54 what was the Hispanic percentage of population in that
09:57:02 district?
09:57:02 A. I believe it was -- the HCVAP was 54 percent. The
09:57:07 particular number is in the report.
09:57:08 Q. Okay. And after Paul Mitchell drew the Prop 50 map for
09:57:14 Congressional District 13, what was the percentage?
09:57:18 A. 53.8.
09:57:19 Q. So it had a slight change?
09:57:22 A. HC -- the map has a pretty significant change, it's a
09:57:26 hundred thousand people, but the HCVAP barely budges.
09:57:31 Q. So the HCVAP personal changed only slightly?
09:57:34 A. That's right.
09:57:35 Q. And what significance does that have in your analysis
09:57:39 that the mapmaker Paul Mitchell was using race in drawing
09:57:44 Congressional District 13?
09:57:45 A. Well again, I think it gives important context to what we

09:57:51 have been talking about earlier in the report, about the way
09:57:52 that the map is drawn when it extends into the Stockton area.
09:57:57 That this is why it bypasses those low HCVAP, heavily
09:58:03 Democratic areas, to get less Democratic, heavily Hispanic
09:58:07 areas. It's the racial -- it's the racial motivation with a
09:58:11 motive now.
09:58:12 Q. So you believe that there was a target that Paul Mitchell
09:58:15 was shooting for?
09:58:16 A. I think that is the upshot of what Dr. Rodden identifies
09:58:20 with the voters who are actually taken out of the district at
09:58:24 the southern end.
09:58:26 Q. As a result of Dr. Rodden's critique on examining the
09:58:32 voters removed and put back in, what did you do next?
09:58:36 A. Well, I had recalled a document that -- from HOPE
09:58:42 suggesting that districts should be drawn in a range from 52
09:58:46 to 54 percent. I recall that doctor -- that Mr. Mitchell had
09:58:52 presented to HOPE and talked about the performance in the
09:58:54 district.
09:58:55 So I wanted to see, okay, that is interesting. Now
09:58:57 we have a district that stays within that 52 to 54 percent
09:59:02 range, and kind of an odd way to get that to happen, are
09:59:07 there other districts where this happens.
09:59:09 MR. MEUSER: And for the Court, the HOPE letter that
09:59:11 the plaintiff -- or the witness just testified to, that is
09:59:15 Exhibit 12 in your binders.

11:38:30 A. Yeah. I don't even know -- I don't know if it's
11:38:32 possible.
11:38:38 Q. You also said that you received -- or you found a
11:38:46 statement that Paul Mitchell made in a presentation to an
11:38:50 organization, is that right?
11:38:51 A. Correct.
11:38:52 Q. Your counsel gave you that statement, right?
11:38:54 A. Gave me the document, yeah.
11:38:59 Q. And you didn't review any other statements Mr. Mitchell
11:39:04 made about what he was doing in Prop 50, right?
11:39:07 A. I think I looked at the whole document, but I didn't --
11:39:11 don't remember anything else.
11:39:12 Q. Outside of that presentation, you didn't look at any
11:39:15 other statements from Mr. Mitchell, right?
11:39:16 A. I think there was a -- I think there was a podcast, as
11:39:22 well, but I'm not sure.
11:39:25 Q. Okay. At most, outside of those two instances, you
11:39:29 didn't look at any other statements Mr. Mitchell might have
11:39:31 made about what he was trying to do in Prop 50?
11:39:33 A. Correct.
11:39:36 Q. And you are aware that in the transcript that you cited,
11:39:40 Mr. Mitchell also said he was drawing a map to push back on
11:39:44 what Texas was doing, an opportunity for Democrats to pick up
11:39:50 five seats and to counterbalance the five Republican seats in
11:39:53 Texas, right?

11:39:53 A. Correct.
11:39:57 Q. You also said there was a letter where that same
11:40:03 organization, HOPE, had suggested some sort of range for
11:40:09 HCVAP districts between 52 and 54 percent rate?
11:40:13 A. Correct.
11:40:14 Q. And that letter didn't suggest any general range for
11:40:20 majority HCVAP districts, right? They were talking about two
11:40:23 districts in LA?
11:40:24 A. Correct.
11:40:26 Q. And the 14 districts you reference, they don't actually
11:40:29 all fall within that 52 to 54 percent range, right?
11:40:33 A. Correct.
11:40:34 Q. And there were other majority minority districts in Prop
11:40:38 50 that fall far outside of that range, correct?
11:40:39 A. There are two, right.
11:40:41 Q. You are not offering an opinion that CD13 was drawn with
11:40:44 a racial target in mind, right?
11:40:47 A. Right.
11:40:49 Q. You are not offering an opinion that any district in Prop
11:40:52 50 was drawn with a racial target in mind, right?
11:40:55 A. Correct.
11:40:57 Q. Okay. Getting close to wrap up here, Dr. Trende. Thank
11:41:10 you for your time.
11:41:13 You served as an expert in the redistricting
11:41:16 litigation in Texas, right?

11:41:17 A. Correct.
11:41:17 Q. And in your opinion, Texas is -- sorry. You also served
11:41:24 as an expert in Texas following the mid-decade redraw of its
11:41:29 congressional map this summer, right?
11:41:31 A. Correct.
11:41:32 Q. In your opinion the Texas -- the new map in Texas is
11:41:39 partisan gerrymander, not a racial gerrymander, correct?
11:41:39 A. Correct.
11:41:39 Q. Let's pull up Exhibit 429. I believe you discussed this
11:41:57 case, a case that is called *Sanchez v. Weber* with your
11:42:04 counsel?
11:42:05 A. Correct.
11:42:06 Q. That was a case that was filed in the California Supreme
11:42:11 Court in August, I believe?
11:42:12 A. That sounds right.
11:42:14 Q. And it was another case that challenged the Prop 50 map,
11:42:18 right?
11:42:18 A. Correct.
11:42:19 Q. It was filed shortly after Prop 50 was enacted?
11:42:22 A. Correct.
11:42:23 Q. And you served as an expert in that case?
11:42:25 A. Yes.
11:42:25 Q. Okay. Let's turn to page 3, paragraph 15.
11:42:44 Here, you wrote, "I was first" -- I guess I should
11:42:48 ask, you recognize this document, right?

Q Thank you.

In what district do you plan on running?

A If -- it depends on the outcome of this lawsuit. But I think right now with the new map, I'm in district 31. That's now my intention.

Q Why does it depend on the outcome of this lawsuit?

A Because last week when I visited the -- I contacted County of L.A. Registrar's office, they can't even give me a definitive map. So I'm waiting -- you know, I make appointment to see them this Thursday. But I wanted to make sure that I know exactly what the boundary is.

Q As someone who has run for federal office twice and intends to run in the future, what is your understanding of your requirements to file for federal offices as a congressional candidate?

A Well, I think it's important that I know the boundary and also I need to collect signatures. I have to file appropriate federal papers, as well as file appropriate papers with the county.

Q As you understand it, is there a filing fee associated?

A Yes.

Q What options if any exist to avoid paying that filing fee?

A Getting as many signatures as possible.
Q And when you say "signatures," you're referring to the petitions that you previously mentioned?
A Correct.
Q Is there a particular date on which you were able to begin collecting those signatures?
A I believe it is December 19th, which is coming Thursday.
Q As a candidate, what do you plan to do on December 19th?
A First thing is I made appointment to go to the county office. And I will pull the papers and I will start collecting signatures.
Q Have you or your campaign made plans to collect signatures at this time?
A Yes.
Q Could you describe those plans a little bit?
A Yes. I will gather volunteers and then start, pass out the signature papers and try to collect as many as possible.
Q So to ensure that I understand your testimony, on December 19th you will collect paperwork and your campaign will immediately begin collecting signatures?
A That's the plan. Correct.
MR. AULISI: Nothing further at this time.

MR. OSETE: For the record, the United States has no questions for this witness. Thank you. Jesus Osete.

CROSS-EXAMINATION

BY MS. KHANNA:

Q Good afternoon, Mr. Ching.

A Good afternoon.

Q Abha Khanna on behalf of the intervenor defendant DCCC. It's nice to see you in person. We met this weekend at your deposition; correct?

A Likewise.

Q It is your understanding that the democrats wanted to redraw the congressional map in order to have more congressional seats for democrats; is that correct?

A Correct.

Q And when it comes to your district in particular, district 31 in the Prop 50 map, you believe the district was drawn to give your opponent more of an electoral advantage; correct?

A Not necessarily.

Q You did not testify in your deposition that you believe district 31 was drawn to give your opponent more of an electoral advantage?

A Well, based on my deposition and then what I learned, also in the deposition I learned that with the new district I may even gain 3 percent as a republican. So I

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

HONORABLE JOSEPHINE L. STATON, U.S. DISTRICT JUDGE

HONORABLE WESLEY L. HSU, U.S. DISTRICT JUDGE

HONORABLE KENNETH KIYUL LEE, U.S. CIRCUIT JUDGE

DAVID TANGIPA, et al.,	)	
	)	
PLAINTIFFS,	)	**CASE NO.**
	)	
vs.	)	**2:25-CV-10616-JLS-WLH-KKL**
	)	
GAVIN NEWSOM, et al.,	)	
	)	**PAGES 473 TO 586**
DEFENDANTS.	)	
	)	

REPORTER'S TRANSCRIPT OF
PRELIMINARY INJUNCTION HEARING
WEDNESDAY, DECEMBER 17, 2025
A.M. SESSION
LOS ANGELES, CALIFORNIA

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he did was not an incumbent preference gerrymander.

So recap. We have direct evidence of an express racial purpose. The leader of the senate stated that the map expands Voting Rights Act districts that empower Latino voters. Mr. Mitchell himself said the first thing that he did when drawing the Proposition 50 map was to add a Latino district, reversing a prior decision to eliminate it by the commission.

And what do we have -- and to this, we have our expert analysis and other circumstantial evidence that I've just reviewed. And what do we have on the other side of the scale? We have no explanation from either the legislative leaders or Mr. Mitchell. They were given every opportunity to come and present their testimony and evidence to this Court, and they did not.

For that reason, the plaintiffs feel that we have met our burden of at least establishing that race predominated in the drawing of the challenged districts and that this is sufficient to -- this does not end the analysis. This does not mean we won the case. But it is enough to move our case into the second phase in which the defendants have the burden of establishing that they satisfied strict scrutiny.

I don't know if you'd like to add anything.

THE HONORABLE JUDGE HSU: Well, that's ten minutes, so I'm going to start asking questions.

MR. COLUMBO: Go for it.

THE HONORABLE JUDGE HSU: Mr. Columbo, you started by saying that your theory was that there was a racial target in mind. Where in your moving papers does that theory appear?

MR. COLUMBO: Well, obviously as the case has evolved --

THE HONORABLE JUDGE HSU: It didn't appear in your moving papers; isn't that correct?

MR. COLUMBO: It is in our reply.

THE HONORABLE JUDGE HSU: Yes. But you can't bring up a new argument for the first time in reply; isn't that correct?

MR. COLUMBO: Well, all of the evidence that we have referred to was indicated in our complaint --

THE HONORABLE JUDGE HSU: But you did not make that argument -- neither you nor the United States made that argument in their moving papers; is that correct?

MR. COLUMBO: The evidence that we pointed to that was available at the time --

THE HONORABLE JUDGE HSU: No. You're not answering my question. Neither you or the United States made that argument in your moving papers; is that correct?

MR. COLUMBO: No. Not as such.

THE HONORABLE JUDGE HSU: Okay. Thank you.

The next question that I have for you is both you

and Mr. Meuser have made an interesting use of the English language. Both you just now and Mr. Meuser pointedly on the first day referred to a predominant reason for the gerrymander. There is not a predominant reason for the gerrymander, there is the predominant reason for the gerrymander.

Do you agree with that? There's only one.

MR. COLUMBO: Well, the analysis has to be -- I mean, it -- there is some nuance to it in that the analysis has to be on a district-by-district basis, so it is entirely --

THE HONORABLE JUDGE HSU: Yes. But -- but -- yes. I agree with you. But -- but the predominant consideration in any district, to succeed you have to show that the predominant interest was racial gerrymandering; isn't that correct?

MR. COLUMBO: Yes. And that is -- so you can have an overall statewide purpose but -- and yet, within the state, have a set of districts which were predominantly drawn on the basis of race.

THE HONORABLE JUDGE HSU: I understand that. But I want to make sure that you agree with me. You are not saying that there can be more than one predominant interest in a district.

MR. COLUMBO: I agree. And if I may correct, on your last question. Page 13 of our opening brief, that's ECF 16-1 at 20, there is -- there is a statement in reference

to *Cooper* about racial targets. We cited *Cooper* for the proposition that racial targets are evidence of a race predominating.

THE HONORABLE JUDGE STATON: So just to follow on that, though, your expert, Mr. Trende, did not opine that CD-13 was drawn with a racial target in mind; correct? I'm just reading from the transcript on cross-examination.

"You are not offering an opinion that CD-13 was drawn with a racial target in mind; right?

"Answer: Right.

"Question: You are not offering an opinion that any district in Prop 50 was drawn with a racial target in mind; right?

"Answer: Correct."

MR. COLUMBO: Yes. His analysis was focused on the -- the kind of circumstantial analysis of evaluating the map as it is, not based on --

THE HONORABLE JUDGE STATON: So nothing in his analysis of the maps itself reflect a racial target.

MR. COLUMBO: Except for the comment -- let me just go back to what I quoted a minute ago. Except for the idea that it would be improbable to have -- to hit the same number of districts in the same range without a racial target.

THE HONORABLE JUDGE STATON: Well, he hit the same range, did he not, with CD-13, the demonstration map A?

MR. COLUMBO: Yes. But --

THE HONORABLE JUDGE STATON: And he did not have any racial target in mind and that's how it came out.

MR. COLUMBO: Yes. But he was also looking at one small region in isolation and moving lines slightly around the edges of that map.

THE HONORABLE JUDGE STATON: He drew a map for CD-13.

MR. COLUMBO: Yeah.

THE HONORABLE JUDGE STATON: He said it wasn't -- it wasn't racially motivated. That was my question to him. That was why. Because it also falls within the target that he says is somehow suspect.

MR. COLUMBO: Yes.

THE HONORABLE JUDGE HSU: Actually all three. He drew three maps.

MR. COLUMBO: But his adjustment of lines within a small area does not preclude that there was an overall -- that there was a purpose to have a set number of districts that were majority-minority or that there was a set --

THE HONORABLE JUDGE STATON: Does it prove that it was?

MR. COLUMBO: No. But it doesn't prove that it wasn't either.

THE HONORABLE JUDGE STATON: Okay. So who has

the burden of proof here? Am I missing that? That's you.

MR. COLUMBO: Well, I have summarized evidence that we have of racial target. It's not coming from Dr. Trende.

THE HONORABLE JUDGE STATON: So I'm going to move to an area where I have the most interest. And that is there's one thing you haven't talked about yet at all and that's the voters. Okay. We're -- this is California. The systems in other states have the legislatures enacting these. You know, presumably in Texas it was the legislature that enacted the map.

You would agree that here the legislature was impotent essentially in terms of putting this map in place, of enacting this map in a way that caused it to take effect. It was the voters; right?

MR. COLUMBO: Well, I think the question that we're trying to answer is why were --

THE HONORABLE JUDGE STATON: Okay. Let me just make sure that my question is asked because you said the question we're trying to answer. The question we're trying to go answer is my question right now, which is, absent a vote yes on Prop 50, absent the voters voting yes on Prop 50, this map doesn't go into effect.

MR. COLUMBO: That is true.

THE HONORABLE JUDGE STATON: Okay. So they have

the final say, the voters.

MR. COLUMBO: They have the final say.

THE HONORABLE JUDGE STATON: And you've said nothing about the voters in this case; right? The voters' intent in any way.

MR. COLUMBO: The question -- the legal question that we are answering is why were the lines drawn the way they were drawn?

THE HONORABLE JUDGE HSU: Is that a no?

THE HONORABLE JUDGE STATON: You've said nothing in the case about the voters' intent; right? You've talked about the mapmaker. And you've talked about even -- you've hinted that maybe the legislature knew what the mapmaker was doing. But you've not talked about the voters at all.

MR. COLUMBO: Correct. The voters -- perhaps the voters' views, if they could be ascertained, could be an element of the analysis. However, in terms of why individual lines are drawn the way they were drawn, whether race predominated or not, very strong evidence would be the person who actually drew those lines, what he was trying to do.

THE HONORABLE JUDGE STATON: But why is that person relevant? So let me pose a hypothetical. Let's just say that the governor says in response to what Texas has done in response to the president's request for five more votes or whatever it was, I don't even remember, in Texas, we are going

to change our maps. It's going to be a partisan gerrymander. We're going to get more democratic seats.

Then there's a map that's drawn that provides more democratic seats. Your experts say you can't just look at the map and see that it's racially drawn. It's not like the one in South Carolina or wherever where you can just see exactly -- or *Alabama* where you can see that it's a racial gerrymander. Nobody tells the voters that it's any kind of racial gerrymander in any way.

So the voters are told repeatedly we are engaging in a partisan gerrymander. We're going to get five more seats. The map that's drawn gets them that. The no on Prop 50 folks say, this is partisan, this is a democratic power grab. The folks on the other side say, yes, it is, but we need to do it. The voters say, yeah, we agree, we need to do it. We need to have -- they voted on it.

Why would we not just be looking at their intent? Why would we not look at that?

The Supreme Court has told us that when it comes to the legislature, when the legislature is making the decision, you don't use the Cat's Paw Theory. You don't look at what somebody else might have thought. You look at the intent of the legislature. They're independent actors. They make the decision. They're not dupes. They're not the dupe of the mapmaker.

Why don't we give the same respect to the voters? They're not the dupes of some mapmaker. They independently decided they wanted a partisan gerrymander.

MR. COLUMBO: Well, just to clarify, the public record -- the public statements by the legislature do include the statements that I reviewed in my opening. So the public -- the public record of what the legislature was saying or the government was saying is mixed. It did include statements that there were racial aspects to what they were doing.

THE HONORABLE JUDGE HSU: But the voters' guide in the preamble made no mention of that; correct?

MR. COLUMBO: Correct.

THE HONORABLE JUDGE HSU: And what -- if there were any commercials that referred to the race-based gerrymandering, I never saw them. Are there any in the record?

MR. COLUMBO: No.

THE HONORABLE JUDGE HSU: Okay. So basically, I mean, sure, I guess in theory someone from the public could go and look at the transcript of what was said in the legislature at some period of time. But basically what was in the voter guide that every voter got and what was on the airwaves was all about partisan gerrymandering and responding directly to what Texas did, which was add five seats.

There was a lot of discussion in this case about, oh, the goal -- in fact, Dr. Trende said his goal was to make

D-13 stronger for the democrats. And he said that -- he applied that same goal in doing his analysis.

That was not the goal. The goal -- the stated goal was to negate what Texas had done, which was create exactly five democratic seats to respond to the five republican seats.

So this argument about, well, they could have made nine, isn't that more evidence that what they were doing was responding directly to Texas?

MR. COLUMBO: Well, the record that we've reviewed includes statements about a racial motive as well. And I grant that the campaign advocacy that was chosen, the strategy that was employed focused on partisan gerrymandering. That's probably a smart strategy if you want the voters to approve the measure.

THE HONORABLE JUDGE HSU: You would say a similar strategy that would be employed, say, to tell HOPE that they should support Proposition 50 because it supports their goals? Like when you're speaking to them to try and get them to vote; right? That's a strategy?

MR. COLUMBO: Well, I think he was being candid that he was delivering what they wanted, yes.

THE HONORABLE JUDGE STATON: So if you're saying it's a smart strategy to say it was partisan, it would have been if you're on the other side a smart strategy to say this

is racial; right?

MR. COLUMBO: We tried to ask him about that and he --

THE HONORABLE JUDGE STATON: No. No. On the no on Prop 50 side. It would have been, then you're saying, a smart strategy to say it was racial. This isn't partisan. This is racial.

MR. COLUMBO: I don't know that that would have been a --

THE HONORABLE JUDGE STATON: Well, okay. But I'm just saying the flip side of what you just said. I'm only playing off of what you just said.

MR. COLUMBO: I -- I --

THE HONORABLE JUDGE STATON: But no -- my point is nobody said that on the no on Prop 50 side; right?

MR. COLUMBO: When -- and when Scott -- when the executive director of the California Republican Party was asked about the statements -- the messages they chose, he did say they were: A, focusing on messages that would turn out republican voters; and, B -- so there was strategy in terms of what messages to focus upon.

THE HONORABLE JUDGE STATON: But it wasn't race.

MR. COLUMBO: And the --

THE HONORABLE JUDGE STATON: No one said race.

MR. COLUMBO: Their conclusion was not to use

race or they did not use race.

THE HONORABLE JUDGE STATON: And you don't have any e-mails back and forth saying this really is race during the time that the Prop 50 campaign was going on or I think you would have shown us those; right?

MR. COLUMBO: Right.

THE HONORABLE JUDGE STATON: Okay. So it's not that you just didn't put that forth to the public. Even internally nobody was saying that.

MR. COLUMBO: There's some stray references in the deposition transcripts. But overall I think you're correct.

THE HONORABLE JUDGE STATON: So let me ask another question in a slightly different area but related. Assemblyman Tangipa, plaintiff in this case, now, he represents rural areas; correct?

MR. COLUMBO: Yes.

THE HONORABLE JUDGE STATON: And communities of interest for him are folks in agricultural and rural areas; is that correct?

MR. COLUMBO: I believe so.

THE HONORABLE JUDGE STATON: Okay. So if he went out during the campaign and said Prop 50 is not good for my community of interest for rural folks, it doesn't -- it doesn't help, it doesn't do what you want, partly -- maybe because of

partisanship or maybe something else. It's not good for you. Would that be okay for him to do? Is there anything inappropriate about that?

MR. COLUMBO: No.

THE HONORABLE JUDGE STATON: Okay. So if you have legislators who are in the black caucus or who have a heavily Latino, black, or Asian community of interest in their -- in their district, and they go out and they say on the flip side, Prop 50 is good for my community of interest, Prop 50 is good for you as a black and brown community, maybe because of partisanship, maybe for other reasons, is that -- is that evidence of racial predominance?

In other words, you can speak to your community of interest if your community of interest isn't an ethnic community or a racial community. But you can't if it is, because then we're going to label that as racial predominance.

MR. COLUMBO: Those statements were offered for this purpose. Number one, to establish that when Proposition 50 -- that Proposition 50 was -- the impetus for Proposition 50 was to react to redistricting elsewhere. The goal of Proposition 50 was to compensate for the impacts of redistricting elsewhere. And the statements show that the perception of redistricting elsewhere was that it had a racial gerrymandering motive. That Proposition 50 is, in addition to being a partisan gerrymander in some respects to compensate for

the expected loss of seats elsewhere, it was additionally compensation for racially gerrymandered --

THE HONORABLE JUDGE STATON: So what you're saying is that by saying Texas was engaged in racist redistricting, by saying that, the implication that we should take from that is so we're going to engage in racist redistricting as a countermeasure.

MR. COLUMBO: And the quotes that I just highlighted say that California, through Proposition 50, is pushing back against racist gerrymandering elsewhere. Proposition 50 --

THE HONORABLE JUDGE HSU: It also says partisan gerrymandering.

MR. COLUMBO: Correct. And they're not mutually exclusive.

THE HONORABLE JUDGE HSU: Right. And so which one predominates?

MR. COLUMBO: As to the challenged district, race. You can say that as an overall project we want to have additional democrat seats. But when you set aside a number of districts within the project and say for those districts we will sacrifice partisan advantage in order to preserve --

THE HONORABLE JUDGE HSU: That wasn't -- their goal wasn't to get partisan advantage in district by district. Dr. Trende made the same I think what I view as error. That

specifically state, Your Honors, which specifically note, thank you, if we look at Exhibit 528, Mr. Mitchell's court-ordered document production is a PowerPoint. He specifically says -- you'll see a lot of colors here. Not only does he have the language that my colleague pointed out, but he has maps. And I know this Court has seen lots of maps and lots of colors. But the maps that Paul Mitchell provides are in red and they're in blue.

The next slide.

This is a document that Paul Mitchell provided pursuant to plaintiffs' request on Exhibit 523. Your Honor asked if there's any documents from Paul Mitchell saying what the goal was? This is Paul Mitchell drawing a red box around these republican leaning seats. And this is Paul Mitchell's statement in his presentation. The goal was flipping five seats -- five of these districts.

THE HONORABLE JUDGE LEE: We can't have, again, a map -- a larger goal the map, which I think everyone agrees, the map was to get five democratic seats to counter Texas. You can have on the big meta map level. But for racial gerrymandering, we don't look at the entire map of the state. We have to look at it by district.

So I'm not sure if this is particularly relevant. I think everyone agrees they wanted five seats, five more democratic seats. But then we have to look at it district by

district. So we have to focus here.

And the only evidence the plaintiffs have provided really is one CD-13. So then we really have to focus on CD-13. And then I see the statement here in the HOPE presentation where it says, "The Prop 50 maps I think will be great for the Latino community in two critical ways: One is that they ensure that the Latino districts that are the VRA seats are bolstered in order to make them most effective, particularly in the Central Valley."

And the second one is about the Ken Calvert seat that you referenced.

So when I look at that statement and when he says "bolster them to make them most effective particularly in Central Valley," I mean, that just seems like an admission.

Again, if Paul Mitchell were here and he could explain all of this, great. But he's not here. He asserted privilege or legislature asserted privilege so we have to accept what he says. And it's pretty plain and clear when someone admits to this.

MS. KHANNA: Your Honor, with all -- I actually think that that's the only statement we have from Paul Mitchell. We have a lot of Paul Mitchell statements in this record, including in this very slide which, if we can look, the specific districts that he's looking at include CD-13. And these are the districts that he says -- for CD-13,

he blocks it out in red -- one of the goal -- his goal is to flip one of the five of these districts.

We cannot just look in isolation at that one quote when -- particularly when plaintiffs are here telling us that we have to look at the entirety.

And I wanted to address your concern, Your Honor, about the legislative privilege here. I just wanted to clarify a couple of things.

In Texas the map drawer did testify on the state's behest about things he wanted to testify. And when there were comments and discussions where they did not want to waive the legislative privilege, including with lawmakers and at the lawmaker's behest, Texas invoked the legislative privilege and that was never pierced.

In North Carolina --

THE HONORABLE JUDGE LEE: He at least explained what factors he did consider. Here, it was a complete blanket. I mean, again, literally did you draw the Prop 50 maps drew an objection -- assertion of legislative privilege and his attorney told him not to answer that question.

That is absurd. This is like saying, you know, is he your attorney? And you say objection, attorney-client privilege. It's absurd. And this went on and on and on. Not a single detail. I mean, I've never seen anything like that.

MS. KHANNA: Your Honor, and, again, I'm not

Ex. 1

STATE OF CALIFORNIA
LEGISLATIVE COUNSEL BUREAU
AUTHENTICATED
ELECTRONIC LEGAL MATERIAL

Assembly Constitutional Amendment No. 8

RESOLUTION CHAPTER 156

Assembly Constitutional Amendment No. 8—A resolution to propose to the people of the State of California an amendment to the Constitution of the State, by adding Section 4 to Article XXI thereof, relating to redistricting.

[Filed with Secretary of State August 21, 2025.]

LEGISLATIVE COUNSEL'S DIGEST

ACA 8, Rivas. Congressional redistricting.

The California Constitution establishes the Citizens Redistricting Commission, which is required to adjust the boundary lines of congressional, Senate, Assembly, and State Board of Equalization districts in the year following the year in which the national census is taken at the beginning of each decade.

This measure, which would include a legislative finding that it is in response to redistricting in Texas in 2025, would, notwithstanding the authority of the Citizens Redistricting Commission, require the state to temporarily use the congressional districts reflected in AB 604 of the 2025–26 Regular Session for every congressional election until the new congressional boundary lines are drawn by the commission in 2031.

Resolved by the Assembly, the Senate concurring, That the Legislature of the State of California at its 2025–26 Regular Session, commencing on the second day of December 2024, two-thirds of the membership of each house concurring, hereby proposes to the people of the State of California that the Constitution of the State be amended as follows:

First—This measure shall be known, and may be cited, as the "Election Rigging Response Act."

Second—The people of the State of California find and declare all of the following:

(a) President Donald Trump has called on Republican-led states to undertake an unprecedented mid-decade redistricting of congressional seats to rig the 2026 United States midterm elections before voting begins.

(b) The State of Texas has convened a special session of its Legislature to redraw congressional district maps to unfairly advantage Republicans.

(c) The Legislature of the State of Florida has established a select committee to advance an extraordinary mid-decade redistricting to unfairly advantage Republicans.

(d) Republicans have urged the State of Ohio to conduct its mid-decade redistricting to unfairly produce more Republican seats in Congress.

(e) Republican officials in the States of Indiana, Missouri, New Hampshire, Nebraska, and South Carolina are also considering President

EXHIBIT
1

Trump's call for the mid-decade redistricting of congressional seats to unfairly advantage Republicans.

(f) President Trump and Republicans are attempting to gain enough seats through redistricting to rig the outcome of the 2026 United States midterm elections regardless of how the people vote.

(g) President Trump's election-rigging scheme is an emergency for our democracy.

(h) The 2026 United States midterm elections are voters' only chance to provide an essential check and balance against President Trump's dangerous agenda.

(i) California has long stood as a national leader for fair, independent, and nonpartisan redistricting.

(j) California calls on all other states to commit to fair and impartial drawing of maps.

(k) California has a duty to defend democracy.

(*l*) The 2026 United States midterm elections for Congress must be conducted on a level playing field without an extreme and unfair advantage for Republicans.

(m) The people of California, not politicians, should have the power to approve temporary congressional district maps in response to President Trump's election-rigging scheme.

(n) It is the intent of the people that California's temporary maps be designed to neutralize the partisan gerrymandering being threatened by Republican-led states without eroding fair representation for all communities.

Third—That Section 4 is added to Article XXI thereof, to read:

SEC. 4. (a) It is the policy of the State of California to support the use of fair, independent, and nonpartisan redistricting commissions nationwide. The people of the State of California call on the Congress of the United States to pass federal legislation and propose an amendment of the United States Constitution to require the use of fair, independent, and nonpartisan redistricting commissions nationwide.

(b) In response to the congressional redistricting in Texas in 2025, and notwithstanding any other provision of this Constitution or existing law, the single-member districts for Congress reflected in Assembly Bill 604 of the 2025–26 Regular Session pursuant to the requirements of Chapter 5 (commencing with Section 21400) of Division 21 of the Elections Code shall temporarily be used for every congressional election for a term of office commencing on or after the date this subdivision becomes operative and before the certification of new congressional boundary lines drawn by the Citizens Redistricting Commission pursuant to subdivision (d).

(c) (1) The Attorney General has the sole legal standing to defend any action regarding a congressional district map adopted pursuant to subdivision (b).

(2) The California Supreme Court has original and exclusive jurisdiction in all proceedings in which a congressional district map adopted pursuant to subdivision (b) is challenged.

(d) The Citizens Redistricting Commission established pursuant to Section 1 shall continue to adjust the boundary lines of the congressional, State Senatorial, Assembly, and Board of Equalization districts in conformance with the standards and process set forth in Section 2 in 2031, and every 10 years thereafter as provided in Section 1.

Fourth—The provisions of this measure are severable. If any portion, section, subdivision, paragraph, clause, sentence, phrase, word, or application of this measure is for any reason held to be invalid by a decision of any court of competent jurisdiction, that decision shall not affect the validity of the remaining portions of this measure. The Legislature hereby declares that it would have proposed, and the voters hereby declare that they would have adopted, this measure and every portion, section, subdivision, paragraph, clause, sentence, phrase, word, and application not declared invalid or unconstitutional without regard to whether any portion of this measure or application of this measure would be subsequently declared invalid.

O

Ex. 10

CAPITOL WEEKLY PODCAST

AUGUST 15, 2025

TRANSCRIBED BY: MARY ANN SCANLAN, CSR

SCANLAN STONE REPORTERS

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EXHIBIT 10

Because, you know, we're already seeing the opposition people come out. You know, Schwarzenegger has voiced his disapproval.

Charles Munger has promised to throw like a hundred million dollars -- or excuse me, $30 million at this.

Kevin McCarthy's come out of whatever hidey hole he's been in saying he's going to, you know, raise a hundred million dollars to defeat this.

And all of it, of course, is being framed as, you know, this is super, super partisan. Which, as you noted, all of this has sparked from very partisan stuff that's happening in Texas, possibly to what's happening here in California, and maybe somewhere else.

But from everything that you just said, you know, you're putting the kind of thought and care into this to try to make it sort of what the Governor and the Democratic party are after here without going so far over the edge that it's -- I don't know the right word is -- absurd.

MR. MITCHELL: Yeah. Extreme.

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MR. EHISEN: Help me out here. Because I don't know that I'm --

MR. MITCHELL: No. And actually, I --

MR. EHISEN: -- (inaudible).

MR. MITCHELL: When this first started, I have to admit, there were people in the Democratic eco stream, you know, this kind of like whirlwind of people that were like calling me because I'm the only redistricting person they know, and trying to talk about what could happen.

So many of them were like, if Texas is going to throw away the VRA, then we can throw away the VRA. Can't we create more districts? Can't we create six or seven or eight Democratic pick-ups? Can we do a 52/0 map?

And I basically had to calmly show them that -- and it wasn't everybody, but just these particular voices that were pushing this stuff. I had to calmly show them, look, we can create a five district pick-up map and follow the Voting Rights Act, keep communities of interest together.

We actually in our map split fewer cities than the State Commission's plan. As of right now, we're kind of finalizing everything. I think we're going to be two or three cities fewer than the existing lines in terms of how many

cities get split in the redistricting. So, you know, we took this care.

When we're drawing these districts, we were considering communities of interest. And, you know, the fact that we can do these things in terms of like drawing a map that is -- you know, it's not touching nine entire congressional districts.

In Texas they don't touch one congressional district. Like everything's changed in Texas except one district.

In ours, we don't touch nine, and another 20 districts are touched less than 10 percent. So it's kind of like trying to reduce how much we have to depart from the Commission's work. And we respect the Commission's work and we think the Commission's work is, you know, the gold standard.

But we do have something we're trying to achieve with these to push back on Texas. We can achieve them while still having a good defensible map.

And part of this, you see like at this press conference, Sara Sadhwani came out, and she is a former Commissioner, and spoke at the rally.

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Now, I don't want to put words into Sara Sadhwani's mouth, but when I first talked to her, I think that the fact that she knew that we were doing this, that we were considering all this stuff, that we had hired a staff person who used to work at the Commission, you know, we were going to do it right. It wasn't going to be hacked up.

I don't think she'd stand up on that stage and say, I support this, if what we're going to get was districts that decimated all the communities, you know, throughout LA, like some of the public map -- or some of the map proposals we've seen. So --

MR. FOSTER: I think that was a really interesting -- when I saw her there, I thought that was really interesting that she was part of this.

MR. MITCHELL: She's not the only one. I got a text this morning from a Commissioner from the 2011 Commission saying, hey, when can we talk? I want to -- we're going to talk this afternoon. And she's -- this is one of four Commissioners that we've talked to that are interested in supporting this because they see

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Ex. 11

HISPANAS ORGANIZED FOR POLITICAL EQUALITY

(HOPE)

PRESENTATION ON ZOOM

OCTOBER 17, 2025

TRANSCRIBED BY: MARY ANN SCANLAN, CSR

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EXHIBIT 11

might use PDI.

But my other hat is that I'm the owner of Redistricting Partners. We're a redistricting firm that's done over a hundred local redistrictings, all nonpartisan. We've done nonpartisan redistricting with a number of commissions, from Los Angeles to New York City to New York state's redistricting, where we've worked twice in New York state.

We've even helped stand up independent redistricting commissions, like where we advised the Ethics Commission in New Mexico on the creation of their first Independent Redistricting Commission. So I've been very tied to nonpartisan and commission-based redistricting, a real fan of it for a long time.

And when this first -- when I was first approached about this, it wasn't even at first like, well, how would I draw the maps? My first reaction was like, there's no way that we can do this. Voters love the Commission. And I support the Commission's work. And why would voters give the Legislature the authority to redraw lines?

And so a lot changed after Texas did what they did to, you know, redo their maps responding

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to President Trump. And the idea of this as being a counterbalance to what Texas was doing became a core kind of idea of this project. And then a commitment that it goes back to the Commission afterwards. That all of this is temporary. So even before I started looking at potential maps, that was what I was thinking about.

Now, when I was first talked to by folks, I won't call out any names of elected officials, but I did have some elected officials call me and say, well, if Texas is going to throw away the VRA, we should just throw away the VRA. You should just draw anything you can. Don't worry about the VRA.

And I would be like, okay, thanks for calling. But there was no way that I was going to do that. Folks who work with me understand that. And also, I just felt like that was going to be the wrong strategy.

So the first real thing I took at -- to answer your question, how did we start approaching drawing maps, it was by utilizing the State Fair Maps Act criteria and the Redistricting Commission's criteria and the

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Redistricting Commission's actual maps.

So one of my first rules of the process was that we would follow the Commission process and have a lot of respect for the Commission work product.

We would also preserve communities of interest. And I have worked, like I said, in so many parts of this state, and my staff, that all kind of came back on a volunteer basis to work on this, had all worked in so many places that we knew where those communities of interest were. We've been active in the state redistricting process.

And following the Voting Rights Act was very important. Even though, as of today, there's a Supreme Court hearing to potentially dismantle it, we still were holding to it.

Now, when we really knew that this was real, I sent a text to my little chat of all my Redistricting Partners staff. And I said, guys, this might happen. Who can get on -- we call it the box. Who can get on the box and start drawing? And this is what I want to draw.

And I started listing out this concept of drawing a replacement Latino majority/minority

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district in the middle of Los Angeles. That was the number one thing that I first started thinking about because it was something that I worked with HOPE on in the last redistricting process.

I'm going to read for a second -- I hate doing this on a presentation, but I'm going to read from a HOPE letter from November 24th, 2021, where it said, HOPE is concerned about the elimination of a majority/minority Latino district within the area of Los Angeles gateway cities.

The seat, which is called by the LA Times the most Latino district in the country, disappeared off the map despite the growing Latino population throughout the state.

And that letter on page 2 illustrated what HOPE wanted to see done in a coalition with a lot of other partners in Los Angeles. And it said, number one, create a gateway cities district centered around Downey, as described in the analysis, allowing for the creation of five Latino majority/minority districts in an area where there are currently four.

Secondly, take the district that was

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called LB North, which is now the Robert Garcia district, take that district to the south through Seal Beach into Huntington Beach, making a Latino-influenced district at 35 percent Latino by voting age population.

That two bullet points was the first thing we did in drawing the new map. We essentially reversed the Redistricting Commission's decision to eliminate a Latino district from LA, the old Ed Roybal district, Lucille Roybal-Allard district, the first Latino majority/minority district in the country, the first Latino member of Congress in the country.

We put that district back. Eliminated the -- basically moving the 41st over there and eliminating the Ken Calvert district in Riverside, and then moving the districts around in order to fill in.

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Now, did that just come up in our head like, hey, it's 2025, let's draw this? No. We went back to maps the Commission was considering. We went back to proposals from HOPE, Equality California, a number of groups that were trying to advocate for these changes in the end of the last redistricting process.

So what we did, which you could only do in California, was we took the Commission map. We kept about 80 percent of it the same, but in certain areas we made small, modest changes in order to create a push back to what Texas was doing, an opportunity for Democrats to pick up five seats, and to counterbalance the five Republican seats in Texas.

And in doing so, we were able to keep a large number of communities of interest together. We were able to reduce the numbers of cities that were split. We were able to protect the Voting Rights Act.

The Voting Rights Act analysis that we got back said -- and, again, I'll read -- while both the Commission map and the draft map are compliant with Section 2, the empirical evidence shows that the public submission map, which is the Prop. 50 map, improves the opportunity for Latino voters to elect candidates of choice in two more districts than the existing plan.

And then PPIC just put out an analysis last week that said that our plan maintained the status quo in terms of the Voting Rights Act and added one more Latino-influenced district.

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So there's a good story to tell about what these maps have done, and that how we did it really was building off of the Commission work product, keeping the same values that the Commission and Californians have, doing modest changes, and, you know, doing the minimum we had to in order to achieve the political goal while protecting communities of interest.

MS. TORRES: Thank you, Paul.

It's always good to hear my words being read back to me --

MR. MITCHELL: Sorry.

MS. TORRES: -- from the flood of ideas that --

MR. MITCHELL: I didn't warn you I was doing that, so anybody knows that was not planned.

MS. TORRES: That's okay.

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MR. MITCHELL: She did not know I was going to do that.

MS. TORRES: But I think you made your point that the crafting of these maps, Prop. 50 maps, it wasn't just, you know, you and a couple bad scientists coming together. It's really truly individuals that are -- and building on the

current maps that are out there.

And, you know, there is no denying it. You mentioned that two great sources, especially PPIC, that, you know, is calling out that this will potentially create a Latino -- an additional Latino seat, or replace -- or bring back the Latino seat that we lost in the past.

With that, and trying as much as we can to keep it nonpartisan, from your perspective, what should Latino voters pay the most attention to when it comes to this -- to these Prop. 50 maps?

MR. MITCHELL: Well, I think that when we get into 2026 election cycle, and presuming these maps pass, I think it's about organizing. There will be different districts in LA in particular. So every district -- because there's this replacement of the Roybal-Allard district in the middle of the gateway cities portion of LA, that essentially moved a bunch of districts going through San Gabriel Valley, through the Inland Empire, where those members of Congress had to look at a map and say, wait, that's not my district. My district got changed significantly.

So you're going to have a lot of members of Congress that are going to be running in new

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areas. And then in particularly the Robert Garcia district that's going to now be Long Beach, goes down into Huntington Beach, which has been pretty antagonistic towards Democrats, somewhat antagonistic towards minority groups, and vehemently antagonistic against the LGBTQ community.

And so you've got some places where he needs to get support and get engaged folks to support and do turnout there for Latinos to protect a Latino member of Congress in a district that is still a Latino-influenced district, but is no longer a majority/minority district because his district, most Latino portions go into the replacement Roybal-Allard district. So that's one big thing.

The other big things are the big things we always talk about, which is trying to get Latinos to vote earlier so that they're not scrambling to try to get them out to the polls on election day.

Looking right now just at the Prop. 21 [sic] vote, Latinos are 28 percent of the registered voters, but only about 13 percent of the votes that have come in so far. So getting Latinos to vote earlier.

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Getting Latinos to, you know, make best use of all the methods of voting, whether it's by mail, drop box, or in person at a vote center, and just really kind of focusing on that engagement.

The Prop. 50 maps I think will be great for the Latino community in two critical ways. One is that they ensure that the Latino districts that are the VRA seats are bolstered in order to make them most effective, particularly in the Central Valley.

And then, secondly, have to hazard a guess, and I don't want to be too political or partisan here, but I have to hazard a guess that whoever gets elected in that gateway cities district in Los Angeles, it's a majority/minority district, is going to be a better representative for the community than the representative being elected from the Ken Calvert seat.

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So I think there are opportunities throughout the map where you might get somebody better representing San Diego/Palm Springs area in a new seat that is drawn under Prop. 50 than you would under the existing Darrell Issa district.

So I think there are opportunities there in the substance of the maps and the outcomes of the maps, and I think there's a lot of opportunities in terms of kind of those VRA concerns as well.

MS. TORRES: So, Paul, you know, I know I only have a couple more minutes with you, but I wanted to come back to just clarify.

You mentioned Prop. 21, but I think you were mentioning -- did you mean to mention Prop. 50 and what the voting count looks like now? Because you're tracking that, right, how much voters --

MR. MITCHELL: Oh, I'm sorry. Yeah. I don't know.

MS. TORRES: Yeah.

MR. MITCHELL: Maybe I misspoke. Yeah. So the Prop. 50 tracker, we have it up now, so we're processing ballots that are -- the counties are processing the ballots that are coming in. And right now Latinos are 28 percent of the votes that have been cast for Prop. 50. And, you know, they're 28 percent of registered voters, and only about 13 percent of the votes that have been cast so far.

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Ex. 14

Paul Mitchell
@paulmitche11

If you're keeping track at home....

👏 "proposed Proposition 50 map will further increase Latino voting power over the current Commission map"Cal Poly Pomona / CalTech cpp.edu/class/politica...

👏 "proposed map likely will increase Asian American voting power" UCLA AAPI Policy Initiative aasc.ucla.edu/resources/poli...

👏 "the proposed plan matches the current one almost exactly: it adds one more Latino influence district but otherwise replicates the status quo." PPIC ppic.org/blog/how-would...

12:45 PM · Oct 23, 2025 · **3,062** Views

3 13 35 2

EXHIBIT 14

Ex. 18

Speaker Rivas Joins California, Texas Democrats to Fight Back Against Trump's Redistricting Power Grab

The Speaker said California voters will see the maps and make the ultimate decision — the most transparent process in the country

FOR IMMEDIATE RELEASE:

Saturday, August 9, 2025

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SACRAMENTO — As Donald Trump pushes to rig the rules of our democracy so Republicans can cling to power in Congress, Assembly Speaker Robert Rivas joined Speaker Emerita Nancy Pelosi, Governor Gavin Newsom, Congresswoman Zoe Lofgren, Senate President pro Tempore Mike McGuire, and Texas and California Democratic lawmakers to fight back against the unprecedented power grab.

"California Democrats will not allow Trump's Republican Party to rig the system and take permanent control of the U.S. House of Representatives," said **Speaker Robert Rivas (D-Salinas)**, "We are prepared and we will fight fire with fire. We will do whatever it takes to defend our democracy. We will do whatever it takes to protect the voices, the votes and the rights of every American."

Trump's attempt to cheat his way to Republican control of the House isn't just another redistricting fight — it's a brazen attack on representative government, and a threat to the people who lawmakers are sworn to protect.

Texas Democrats, who are taking action to block Republican efforts in their state, joined California leaders and lawmakers in downtown Sacramento and stood united in defending and empowering voters to resist and defend California.

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"The President has paved over the Rose Garden, he has paved over freedom of speech, he has paved over freedom of education — the list goes on and on. Independent judiciary, rule of law—paved over. But we will not let him pave over free and fair elections in our country," **House Speaker Emerita Nancy Pelosi** said during Friday's press conference.

"Donald Trump is tipping the scales of justice toward injustice for us all — he realizes his agenda is so unpopular that he'd rather rig the next election and prevent voters from holding him accountable and provide a check on his deeply unpopular policies. California stands ready to flex its muscle to ensure the integrity of our democracy nationwide," **Governor Gavin Newsom** said.

"Today, we are at a flash point set in play by Donald Trump and Texas Republicans who see the writing on the wall that they'll lose the midterms — and they're trying to cheat to win," **Senate President pro Tempore Mike McGuire** said. "President Trump's cynical ploy to redraw congressional maps in Texas is rotten to its core. It is our sacred responsibility to defend our democracy and the people of the Golden State, so if Texas moves forward, we need to be prepared to do the same."

Members of the Assembly Democratic Caucus who attended Friday's event also echoed the Speaker's commitment to protecting California, democracy and working families, emphasizing the urgent need to confront Trump head-on.

"It's troubling that some people, including the president and national Republicans, think it's fine to mess with the system for political gain with mid-decade redistricting. Why? Because they know people don't support their agenda of gutting health care, killing programs that working people and the poor depend upon, separating immigrant families, and hurting American small businesses and consumers with reckless tariffs," said **Assembly Majority Leader Cecilia Aguiar-Curry (D-Winters).** "Here in California, we believe in fair play and transparency, which is why we have independent redistricting to protect democracy. But, we can't roll over while Trump cheats."

"California will always defend the right to vote—and the will of the people. Voters made it clear: they want independent redistricting, not partisan power grabs. Unlike Texas, we won't silence that voice. We'll send this issue to the ballot box—where it belongs," **Assemblymember Anamarie Ávila Farías (D-Concord)** said.

"When an unprecedented power grab by the Trump administration threatens to destabilize the foundations of our Democracy, we can and must do everything necessary to stand in the way and fight for what is right. That is who we are in California," **Assemblymember Isaac Bryan (D-Los Angeles**) said.

"Redistricting should be about making sure every voice counts. President Trump and Texas Republicans are using it to drown out the voices they do not want to hear, especially communities of color and working families. Their manipulation of our democracy is wrong and we will not sit on the sidelines. We will call out the injustice, protect representation, and make sure our democracy reflects communities like mine," **Assemblymember Avelino Valencia (D-Anaheim)** said.

Speaker Rivas reinforced a commitment to California voters seeing all the maps and casting the ultimate decisions — the most transparent process in the country. Members also insisted on sustaining the independent commission.

The stakes could not be higher. This is an emergency. And California must fight back.

###

For more information, follow Speaker Robert Rivas at the following social media channels:

Instagram: **@CaSpeakerRivas**

Facebook: **www.facebook.com/CASpeakerRivas/**

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Ex. 21

Mike McGuire
CALIFORNIA STATE SENATOR | DISTRICT 02

Empowering Voters To Protect California

AUGUST 19, 2025

SACRAMENTO—Today, Democrats in the California State Legislature announced new legislation to call a special election in November, empowering voters to protect our state's economy and democracy, and fighting back against reckless attacks by Trump and Republicans.

The legislation includes a state constitutional amendment to set a special election on November 4. It also makes public, for all voters to see and review, new proposed Congressional maps for California.

Voters will have the final say on the maps when they cast their ballots.

The proposed maps are now publicly available on the **Senate and Assembly Elections Committee websites.**

Californians also can provide input on the map **via a public portal** on the same website, which already has received more than 3,000 public comments since its launch on Wednesday.

Our Democratic Approach Empowers Voters, Protects People and Communities, and Promotes Transparency

Republican redistricting efforts in Texas and other states are dividing communities, undermining voter freedom — and their maps are drawn in secret without letting the people decide.

In California, lawmakers in the Assembly and Senate pushed for key provisions in the legislation to ensure fidelity to independent commissions, protections for the Voting Rights Act, and preservation of California cities and communities:

- **California will keep the Independent Citizens Redistricting Commission**. The Legislature's plan makes sure the Commission maintains its full scope of work and authority after the 2030 Census and beyond, redrawing California's Congressional, state legislative and Board of Equalization lines every 10 years.

EXHIBIT 21

Mike McGuire
CALIFORNIA STATE SENATOR | DISTRICT 02

controlled states, most notably Texas, are considering gerrymanders aimed to benefit their party. Unlike California, none are submitting those plans for voter approval.

- **Every state in the country should have independent redistricting**. The bills include provisions to express California's policy to support nonpartisan, independent redistricting nationwide and would call on Congress to initiate a federal constitutional amendment to require nonpartisan, independent redistricting nationwide.
- **Protecting communities of color and historically marginalized voters**. The new map makes no changes to historic Black districts in Oakland and the Los Angeles area, and retains and expands Voting Rights Act districts that empower Latino voters to elect their candidates of choices.
- **Keeping cities and communities together.** The proposed Congressional map keeps more cities whole within a single district than the most recent map enacted by the commission.

What Senate President Pro Tem Mike McGuire Says

"This is about more than drawing lines on a map, it's about drawing a line in the sand to stop Texas and Trump from rigging the election. This is about protecting the people of the Golden State, our Democracy, and making sure voters have a say. Access to health care matters. Reproductive rights and Planned Parenthood matters. Making life more affordable matters. So does keeping tariffs from killing California jobs. These are the stakes, this is what we will be voting on this week in the Legislature, and what the people of California will vote on in November."

What Assembly Speaker Robert Rivas Says

"Trump sparked this national crisis when he called Texas to rig the election. California is fighting back. Democrats are empowering voters to protect working families and our democracy — with the most transparent process in the nation. Voters will see the maps and have the final say. The stakes couldn't be higher, but I'm confident we'll defeat this assault on our democracy and end Trump's attacks on California."

Mike McGuire
CALIFORNIA STATE SENATOR | DISTRICT 02

- A constitutional amendment which authorizes the replacement of the existing Congressional map
- A statute which contains the new proposed Congressional map for voter approval
- A statute to call the special election, appropriate funding for election administration, and make conforming changes to election calendars.

How Trump and Republicans Continue to Harm California's Families, Workers and Businesses

- Trump's tariffs are making family essentials and basic household items more expensive.
- Trump's budget slashes billions of dollars in funding for social services, threatening access to health care and food for millions of Californians.
- Trump's immigration raids are damaging California's economy as they terrorize our communities.
- Trump is arbitrarily and capriciously cutting off grant funding for California's research universities, along with K-12 funds, punishing California students and stalling resources for afterschool programs and teacher training.
- Trump and the federal government are playing politics with California's requests for relief following the devastating January fires in Los Angeles.

Timeline of Anticipated Legislative Action

Monday, August 18: Legislation into print in Assembly and Senate

Tuesday, August 19: Assembly and Senate Elections Committees hear legislation

Wednesday, August 20: Assembly Appropriations Committees hears legislation

Thursday, August 21: Anticipated floor votes in both Assembly and Senate

Mike McGuire
CALIFORNIA STATE SENATOR | DISTRICT 02

Mike McGuire is President pro Tempore of the California Senate. He represents the North Coast of California, which stretches from the Golden Gate Bridge to the Oregon border, including Del Norte, Trinity, Humboldt, Lake, Mendocino, Sonoma, and Marin Counties. Website of Senate Leader McGuire: ***https://sd02.senate.ca.gov/***

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Latino Voters and the November 2025 Special Election: Redistricting and Representation

Dr. Raquel Centeno (Caltech Linde Center for Science, Society, and Policy)[1]

Dr. Jarred Cuellar (California State Polytechnic University, Pomona)[2]

Executive summary: This nonpartisan and educational report analyzes the impact of the proposed Proposition 50 map on Latino representation across California, with a focus on how the proposed map would alter Latino-majority and Latino-influence congressional districts if it is adopted by voters. Our analysis finds that the proposed map will likely not negatively impact Latino voting power. The proposed map instead diffuses and enhances that power across more districts, and in many ways reflects the changing demographics of communities within the state. While the current map increased Latino voting power over the previous map, we also find that the proposed Proposition 50 map will further increase Latino voting power over the current Commission map. The proposed map will likely *increase* Latino voting power, given its creation of two new Latino community influence districts and the expansion of the Latino electorate in other districts.

Key findings of this report:

• The current map has 16 Latino-majority districts, and the proposed Proposition 50 map maintains 16 Latino-majority districts. From our review of the maps, both the current map passed by the Commission and the Proposition 50 map being presented to voters enhance Latino voting strength and Latino communities of interest over their predecessor maps.

• The current map has 14 Latino-majority districts that frequently elect candidates preferred by Latino voters, and the proposed map is likely to improve Latino representation by creating 16 Latino-majority districts that frequently elect Latino voters' preferred candidates.

• The current map has 6 Latino-influence districts, and the Proposition 50 map will increase the number of Latino-influence districts to 8.

• The proposed Proposition 50 map will likely increase Latino descriptive representation—the election of Latino representatives—via the creation of a new Latino-majority District 41 in southeastern Los Angeles County, as well as the likely reelection of the Latino representative in neighboring District 42. New Latino-influence districts in the proposed map may also provide new opportunities for Latino candidate emergence.

• Latino voters are the largest minority group in California and are increasingly flexing voting power. Both the current map passed by the Commission and the Proposition 50 map reflect this

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Latino voting power in the state, though differential turnout between Latino voters and non-Latino voters in California plays a critical role in who gets elected and who is represented.

I. Introduction & Context

Purpose of the Report

This nonpartisan and educational report examines the potential effects of California's Proposition 50 on Latino voters, who constitute nearly forty percent of the state's population and 32% of the citizen voting-age population, and play a central role in shaping the state's political future. Although redistricting has implications for all Californians, the Latino electorate merits focused analysis because of its size, regional distribution, and internal diversity. Latino communities are not a uniform constituency; they differ significantly across urban, suburban, and rural regions in terms of socioeconomic status, citizenship rates, linguistic backgrounds, and political participation. These variations influence both how district boundaries translate into political representation and how redistricting changes may amplify or diminish Latino influence in congressional elections.

By isolating the specific effects of Proposition 50 on Latino voters, this report aims to identify where the proposed temporary redistricting process may alter opportunities for representation. Specifically, we examine and compare the current congressional map and the new map that would be put in place temporarily if Prop 50 passes. Understanding these differences is essential to determining whether Proposition 50 strengthens or weakens pathways to equitable representation for California's Latino population.

Background on Proposition 50 and Redistricting

Proposition 50, officially titled the *Election Rigging Response Act*, proposes a temporary transfer of congressional redistricting authority in California from the California Independent Citizens Redistricting Commission to the state Legislature for the 2026, 2028, and 2030 election cycles. The measure would allow voters to put into place a new congressional map put on the ballot by the Legislature that complies with federal requirements such as equal population and contiguity. After the 2030 Census, redistricting authority would revert to the Citizens Redistricting Commission under the standard decennial process.

California's independent redistricting framework was established through voter initiatives in 2008 and 2010 to reduce partisan influence and enhance public accountability. The Citizens Redistricting Commission has since been regarded as a model for transparent and nonpartisan mapmaking. Proposition 50 would temporarily alter this structure, introducing new maps that voters will consider in 2025. Understanding this institutional shift provides essential context for evaluating its potential implications for Latino political representation and the broader distribution of congressional influence across the state.

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How Redistricting Has Historically Shaped Latino Representation in California

Redistricting has played a decisive role in shaping Latino political representation in California. Major gains in Latino representation have occurred in response to redistricting, such as historic local changes made through *Garza v. County of Los Angeles* and other significant redraws. Across successive census cycles, boundary changes have expanded and constrained Latino electoral influence, affecting the creation and preservation of majority-Latino and Latino-opportunity districts under the Voting Rights Act—and preserving and enhancing Latino communities of interest. The establishment of the Citizens Redistricting Commission in 2010 marked a significant institutional shift toward greater transparency and reduced partisan manipulation, and commission-drawn maps have generally corresponded with increases in Latino-majority districts and officeholders.

Nevertheless, disparities persist between Latino population size and political representation, reflecting not only the enduring sensitivity of redistricting to Latino voting power but also broader structural factors such as turnout, citizenship, and candidate recruitment. As such, redistricting remains a central mechanism through which Latino inclusion and influence in California's democratic process continue to be negotiated.

II. Demographic Overview

Latino Population Trends in California

Latinos comprise roughly 40 percent of California's total population, making them the state's largest demographic group (NALEO 2024). Their political influence continues to expand within the *Citizen Voting-Age Population* (CVAP)—the segment of residents aged 18 and older who are U.S. citizens and therefore eligible to vote—which serves as a key metric in voting-rights and redistricting analyses (U.S. Census Bureau 2025). As of the most recent 2019–2023 CVAP tabulation, Latinos constitute approximately 32.4 percent of California's total CVAP, underscoring their growing weight within the state's eligible electorate (NALEO 2024 & Redistricting Data Hub 2025).

From 2012 to 2022, the Latino CVAP expanded from 6.4 million to 8.5 million—an increase of 32.5 percent that accounted for more than 90 percent of the state's overall growth in eligible voters during that period (NALEO 2024). This sustained expansion positions Latino voters as an increasingly central constituency in California's political landscape and a focal point for assessing electoral equity under any proposed redistricting changes.

Spatially, Latino populations are most concentrated in Los Angeles County, which remains the single largest Latino population center in the United States. The Inland Empire (Riverside and

San Bernardino Counties) is now majority Latino—about 52 percent of residents identify as Latino (OCPSC 2025)—and the Central Valley also hosts numerous majority-Latino counties. Significant concentrations extend across the Central Coast, San Diego, Imperial, and inner Bay Area regions as well (UCLA Latino Policy & Politics Institute 2021; U.S. Census 2020). At least 11 of California's 58 counties now have Latino majorities.

While the overall state population has stabilized, Latino growth within the electorate has continued due to natural increase, naturalization, and aging into voting eligibility. Recent *CVAP* data from the 2019–2023 American Community Survey confirm that Latinos are steadily increasing their share of California's eligible-voter base (U.S. Census 2025).

These demographic and geographic patterns are directly relevant to redistricting. Latino population concentration—particularly in the Inland Empire and the Central Valley—creates opportunities for drawing districts where Latino voters can flex electoral power and elect candidates of their choice. Conversely, uneven growth or dispersed settlement in suburban regions raises the risk that new district lines could divide cohesive Latino communities, diluting their collective influence. As Proposition 50 proposes temporary changes to congressional map-drawing authority, these evolving demographic realities underscore the importance of evaluating how any interim maps will reflect, or potentially distort, California's Latino electorate.

Political Participation in Congressional Elections

Latino engagement in California is increasingly consequential in congressional contests, though participation remains uneven and sensitive to electoral context. Registration among Latinos has grown, but gaps persist relative to their share of the citizen voting-age population. According to NALEO's 2024 portrait, Latino registered voters make up about 30% of California's total registered voters—while Latinos account for roughly 36% of the state's eligible electorate (i.e., citizen voting-age population). This disparity suggests that a nontrivial share of eligible Latinos have not yet registered, limiting their potential influence in all elections, including those for the U.S. House.

When it comes to turnout in congressional and midterm cycles, Latino participation tends to fluctuate with electoral competitiveness. Historical data from the California Voter Turnout Project show that, in general elections, Latino voters are under-mobilized in off-year cycles compared to presidential years. Given that congressional elections typically occur in these lower-turnout contexts, the consistency of Latino engagement is especially critical to representation and policy responsiveness. Further, while Latino voters often prefer Democrats in California, cohesion levels can vary within the diverse Latino voter populace.[3]

[3] Jarred R. Cuellar. 2025. "*Fe y Politicas*: Latino Evangelical Vote Choice in the 2020 Presidential Election." *Religions* 16(6):708. Also see Matt Barreto. 2010. *Ethnic Cues: The Role of Shared Ethnicity in Latino Political Participation.*

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Examples of Districts in Current Map Where Latino Participation Was Key in 2022 and 2024

In several recent House races, Latino turnout—and the success or underperformance of Latino-preferred candidates—was pivotal:

- **CA-13 (Central Valley)**: A majority-Latino district (50.2% Latino CVAP) where Democrat Adam Gray defeated Republican John Duarte by just 187 votes in 2024, following Duarte's 564-vote win in 2022. Latino voters supported Gray both cycles, and minor shifts in turnout likely determined the outcome.[4] While the Latino-preferred candidate won narrowly in 2024, the opposite occurred in 2022.

- **CA-22 (Kings, Tulare, and Kern Counties)**: A 59% Latino CVAP district where Rep. David Valadao (R), who is of Portuguese descent, has not been the Latino-preferred candidate. Most Latino voters supported Democrat Rudy Salas, yet Valadao's victories in 2022 and 2024 were sustained by lower Latino turnout and stronger participation among non-Latino voters. This pattern highlights how turnout gaps—rather than a simple focus purely on the Latino CVAP—can dilute Latino electoral power.
- **CA-27 (Northern Los Angeles County)**: Roughly 33% Latino CVAP, this district defeated the incumbent in 2024 after several close contests, reflecting the influence and mobilization among younger and suburban Latino voters in a competitive district.
- **CA-41 (Inland Empire)**: At 29.7% Latino CVAP, this district remained competitive across 2022 and 2024, with margins narrow enough that Latino turnout increases could materially affect future results if this district is not changed. This district did not elect candidates in 2022 and 2024 preferred by Latino voters, but was electorally competitive.

In sum, Latino political participation in congressional elections reflects a dynamic interplay of voter registration levels, turnout volatility, Latino voter cohesion, and generational renewal. Because U.S. House outcomes in California can hinge on narrow margins, mobilizing Latino voters—especially in competitive and Latino-majority districts—can directly shape representation. Proposition 50's temporary redistricting framework must therefore be assessed not only in terms of population balance, but also in how new district boundaries either strengthen or weaken the ability of Latino-preferred candidates to translate community support into electoral success.

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[4] These data on voting preferences are taken from analysis of individual-level survey data and additional analysis of homogenous precincts. For survey data, please see the California Elections and Policy Poll of 2024 California congressional districts. In California, survey data shows that a majority of Latino voters prefer Democratic candidates of choice.

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III. Latino Representation in Current vs. Proposed Maps

Current Map: 16 Latino-majority Districts and 6 Latino-influence Districts

The maps created by the California Citizens Redistricting Commission during the 2020 redistricting cycle resulted in a noteworthy 16 Latino-majority districts and 6 Latino-influence districts. *Latino-majority districts* are districts in which Latinos make up a majority of the citizen voting age population, meaning campaigns in these districts are incentivized to campaign for and mobilize Latino voters. We define *Latino-influence districts* as those in which Latinos are a significantly sized minority, meaning they are at or above 30.0% of the district's CVAP but below 50.0% Latino CVAP. In these districts, Latinos are a large enough portion of the voting population to play an influential role in election outcomes.

The current map was drawn to comply with the Voting Rights Act, ensuring that Latino voters have fair opportunities to elect candidates of their choice in districts where they form a sufficiently large and cohesive community.[5] Many of these districts are concentrated in the Central Valley and interior communities including San Bernardino, Riverside, and Imperial Counties. Table 1 lists all Latino-majority districts under the current map, and Table 2 lists the Latino-influence districts in the current map. The districts are listed in order of highest to lowest Latino CVAP.

Table 1: Latino-Majority Congressional Districts Under Current Map

District	Representative	% Latino CVAP in Commission map
22	Valadao	59.4%
35	Torres	57.4%
34	Gomez	56.1%
38	Sánchez	55.6%
31	Cisneros	54.7%
29	Rivas	54.2%
21	Costa	53.3%
25	Ruiz	52.5%
33	Aguilar	52.5%
42	Garcia	52.4%
39	Takano	51.2%
52	Vargas	51.1%
44	Barragán	51.0%
18	Lofgren	50.5%
46	Correa	50.5%
13	Gray	50.2%

[5] Christian R. Grose and Lucien LaScala. 2023 "The Supreme Court Supports Voting Rights - with massive implications for congressional redistricting." *3Streams Blog/Medium.*

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Source: https://wedrawthelines.ca.gov/final-maps/. Percentages rounded to nearest tenth, based on 2020 Census for each district as reported by the Citizens Redistricting Commission.

Table 2: Latino Community Influence Districts Under Current Map

District	Representative	% Latino CVAP in Commission map
43	Waters	44.0%
37	Kamlager-Dove	38.7%
27	Whitesides	33.3%
23	Obernolte	32.8%
26	Brownley	31.6%
9	Harder	31.0%

Source: https://wedrawthelines.ca.gov/final-maps/. Percentages rounded to nearest tenth, based on 2020 Census for each district as reported by the CA Citizens Redistricting Commission.

With Latino-majority districts totaling approximately 30% of California's 52 congressional districts, it is clear why Latinos are an important group within the electorate. When including the six Latino-influence districts in the current map, Latinos are a sizable portion of the electorate in over 40% of the state's districts. Latino-majority districts are spread throughout the state, generally found in places with historically large concentrations of Latinos. Of the five districts with the highest Latino CVAP, one is in the Central Valley (CD 22); three are in the greater Los Angeles region (CDs 31, 34, and 38); and one is in the Inland Empire (CD 35). Most of these districts are concentrated in the Central Valley or further south.

However, just because Latinos are the majority (or even a large minority) of a district does not mean it is a guarantee that a Latino candidate of choice will be elected. Racial turnout gaps and fluctuations in electoral competitiveness sometimes result in lower than expected levels of support for Latino candidates of choice, even within Latino-majority districts. For example, in the rural and agricultural communities of CD 22, lower Latino turnout in part led to the Latino candidate of choice losing the 2024 election. Increases in the size of the Latino electorate even in already Latino-majority districts in the proposed map could result in meaningful differences in election outcomes. These changes could be especially palpable in districts like CD 22 where the Latino electorate tends to be lower in socioeconomic status and younger, making mobilizing lower-propensity voters especially challenging. Similarly in the current Commission-drawn CD 13, the Latino candidate of choice has not always won in this district.

Taking into account how frequently Latino candidates of choice are elected in these districts, the current map has 14 districts that are effectively providing an opportunity to elect Latino voters' preferred candidates in every election since the map was put into place. However, two of the 16 Latino CVAP-majority districts in the current map passed by the commission—CD 13 and CD 22—are not effectively providing Latino voters' preferred candidates the opportunity to win. In

2022, the Latino-preferred candidate lost in both CD 13 and CD 22; and in 2024, Latino voters' preferred candidate lost in CD 22.[6]

Proposed Map: 16 Latino-majority Districts and 8 Latino-influence Districts

The new map maintains the same number of Latino-majority districts as the current map, and it increases the number of districts that will provide effective opportunities for Latino voters to elect candidates of choice. Even with changes to district boundaries, the proposed Proposition 50 map will result in 16 Latino-majority congressional districts. Table 4 shows the percentage of the Latino CVAP in each of the majority-Latino districts in the proposed map. In general, most of the Latino-majority districts under the current map remain a Latino-majority district in the proposed map. The Prop 50 map maintains the same number of Latino-majority districts as the current map.

In fact, a number of Latino-majority districts in the proposed Proposition 50 map change very little relative to the current map. For instance, the Latino-majority District 18 and the Latino-majority District 34 had only minimal changes over the current map. District 18 was created by the Commission in 2020 to provide an additional Latino-opportunity district representing Salinas Valley communities of interest. This district faces minimal changes in the proposed Proposition 50 map and thus maintains Latino voting strength in this region. District 34 is a historically Latino district that has existed over many redistricting cycles and includes eastern sections of the city of Los Angeles, and this district is maintained with significant Latino voting strength.

There is one new Latino-majority district created in the Proposition 50 map that was a non-Hispanic white-majority district in the current map (CD 41, bolded in Table 4). This white-majority CD 41 is represented by Ken Calvert in the current map. The proposed map shifts CD 41 to the west to create a new Latino-majority district centered in the Gateway cities area of southeastern Los Angeles County. This shift of CD 41 into a new Latino-majority district caused one district (CD 42) to have a meaningful decrease in Latino CVAP. It appears that this change occurred because CD 42 was altered to create CD 41 around the Gateway cities community of interest area and to increase the Latino CVAP of CD 41. Public testimony during the 2020 Commission process frequently identified the northern Gateway cities as a community of interest and the city of Long Beach as a separate community of interest, and this significant level of testimony may have factored into the newly proposed CD 41 in the Proposition 50 map.

Where CD 41 is not a Latino-influence district in the current map, in the proposed map it has the third highest Latino CVAP proportion in the state. The current map's CD 42 is Latino-majority,

[6] We examined individual-level survey data in these districts, as well as conducted an analysis of homogenous precincts to draw these empirical conclusions. For instance, surveys we have conducted of congressional districts showed that the Latino-preferred candidates lost in both CD 13 and CD 22 in 2022, and in CD 22 in 2024. Thus, while these districts are majority-Latino CVAP, the districts are not effectively electing the candidates that a majority of Latino voters voted for.

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and in the new map it is centered in Long Beach and coastal Orange County. The proposed CD 42 is a racially and ethnically diverse district with slightly less than half of the district's CVAP being voters of color. CD 42 will likely continue to elect the Latino representative who currently represents Long Beach in the current map if Proposition 50 passes and if voters of color vote in coalition for this Latino representative, even though it is no longer Latino-CVAP majority.

Table 4: Majority Latino Congressional Districts in Prop 50 Proposed Map

District	Representative	% Latino CVAP	Change from 2020 Commission Map
22	Valadao	65.4%	+6.0%
44	Barragán	62.3%	+11.3%
41	Calvert	55.0%	+25.3%
34	Gomez	54.9%	-1.2%
33	Aguilar	54.5%	+2.0%
21	Costa	54.4%	+1.1%
39	Takano	54.3%	+3.1
13	Gray	53.8%	+3.6%
29	Rivas	53.6%	-0.6%
35	Torres	53.1%	-4.3%
18	Lofgren	53.0%	+2.5%
46	Correa	52.7%	+2.2%
38	Sánchez	52.6%	-3.0%
31	Cisneros	52.2%	-2.5%
25	Ruiz	52.1%	-0.4%
52	Vargas	51.8%	+0.7%

Source: https://aelc.assembly.ca.gov/proposed-congressional-map. Percentages rounded to nearest tenth, based on 2020 Census for each district as reported by the CA State Assembly.

While the number of Latino-majority districts remains the same, the proposed map does shift the share of Latino voting power across districts. There is an increase in the Latino CVAP of ten districts, and in eight of those districts, the Latino CVAP would be at least two percentage points higher than in the current map. Such a change is noteworthy because even a two percentage point increase in Latino CVAP can make a meaningful difference for Latino candidates of choice, and two districts see even greater jumps in their Latino CVAP. If Proposition 50 is passed, CD 22 in the Central Valley would have a 6 percentage point higher Latino CVAP and CD 41 in southern California would have a 25 percentage point higher Latino CVAP than in the current map.

Not all districts in the proposed map would increase the size of their Latino electorate. The Latino CVAP would decrease in six Latino-majority districts. However, these decreases would generally be small, hovering around one percentage point or less. Of the Latino-majority districts in the Proposition 50 map, CD 35 and CD 38 are the two districts that would see the largest decreases in their Latino electorate, with about a 4%-point drop to 53.1% and a 3.0%-point drop

to 52.6%, respectively. However, given that these districts still have high enough Latino CVAPs to not even fall to the bottom of the list in Table 4, there is reason to believe the proposed map would not significantly dilute the Latino voting power in these districts.

To summarize, the Latino CVAP increased in a number of proposed districts where Latino voters have not had meaningful voting strength, and the percentage point increases are relatively significant. In districts where Latino CVAP declined, most of these declines are relatively small and in districts where Latino voters' preferred candidates are winning in the current Commission map and will likely continue winning in the Proposition 50 map. Only in CD 42 was there a significant decrease in Latino CVAP in the proposed map, though it was offset by the significant increase in Latino CVAP in CD 41.

Table 5: Latino Community Influence Congressional Districts in Prop 50 Proposed Map

District	Representative	% Latino CVAP	Change from 2020 Commission Map
43	Waters	46.5%	+2.5%
37	Kamlager-Dove	39.8%	+1.1%
27	Whitesides	39.5%	+6.2%
23	Obernolte	37.0%	+4.2%
26	Brownley	33.9%	+2.3%
48	Issa	32.0%	+10.6%
20	Fong	31.8%	+6.4%
9	Harder	31.0%	+0.0%

Source: https://aelc.assembly.ca.gov/proposed-congressional-map. Percentages rounded to nearest tenth, based on 2020 Census for each district as reported by the CA State Assembly.

Table 5 shows the congressional districts that are not Latino CVAP majority but would meet the over 30% Latino CVAP threshold to be considered a Latino community influence district. **While the current map includes a noteworthy six Latino-influence districts, the proposed map would increase the number of Latino-influence districts to eight.** None of these districts would face decreases in their Latino CVAP under the new map boundaries. Many would see significant increases in the Latino portions of their electorate, strengthening the relative power of the Latino vote in those communities. The one district with little change in Latino CVAP under the new map would be CD 9, in which Latinos would remain the same 31% of the CVAP as the current map.

Of particular noteworthiness are the two new Latino influence districts, CD 20 and CD 48 (bolded in Table 5). Neither district has a sufficiently large enough Latino CVAP under the current map to be classified as a Latino influence district (25.4% and 21.4% respectively). With the proposed map, however, CD 20 would have a Latino CVAP of nearly 32% and CD 48 would also have a Latino CVAP of 32%. These are significant shifts in districts that under the current map have much larger non-Hispanic white majorities. While the current map has a notable number of Latino-influence districts, the proposed map creates a heightened Latino electoral

advantage through the creation of two new Latino-influence districts and generally larger Latino CVAPs than in pre-existing influence districts in the current map.

In addition, at least two of these proposed Latino-influence districts have majority-minority CVAPs, providing additional opportunities for Latino voters to flex strength if voting cohesively and in concert with other minority groups. Voters of color are more than 60% of the CVAP in Proposition 50's CD 9, while voters of color were about 55% of the district's CVAP in the Commission map. Latino voters may be able to elect preferred candidates if there is a multiracial coalition in this district. In both the current and proposed maps, District 27 has a majority-minority CVAP. Latino voters are the largest minority group in District 27 in the Proposition 50 map, and this district could provide electoral strength to Latino voters who vote in coalition with other voters of color or with crossover white voters.

To summarize, the Proposition 50 map increases the number of Latino-influence districts, defined as districts with Latino CVAP of 30% to 50%, relative to the current map. Both the current map and the proposed map provide meaningful influence for Latino voters in influence districts (6 influence districts in the current map and 8 influence districts in the proposed map).

IV. Key Districts of Interests for Latinos

The table below summarizes several of the largest net gains and net losses in Latino CVAP in the Proposition 50 map relative to the current map. As can be seen, several districts in southern California (CA-41, CA-44, CA-48) and the Central Valley (CA-20, CA-22) have gains in Latino CVAP in the proposed Proposition 50 map. Several other districts, all in southern California (CA-29, CA-31, CA-35, CA-38, CA-42), have reductions in Latino CVAP in the proposed Proposition 50 map relative to the current map.

Table 6: Proposed Districts with Largest Net Gains and Losses in Latino Eligible Voters

District	Representative	Net Change Latino CVAP (in Percentage Points)
41	Calvert	+25.3
44	Barragán	+11.3
48	Issa	+10.6
20	Fong	+6.4
22	Valadao	+6.0
42	Garcia	-27.8
35	Torres	-4.3
31	Cisneros	-2.5
38	Sánchez	-3.0
29	Rivas	-0.6

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Source: https://aelc.assembly.ca.gov/proposed-congressional-map, https://wedrawthelines.ca.gov/final-maps/. Percentages rounded to nearest tenth, based on 2020 Census for each district as reported by the CA State Assembly.

Regional Breakdown of Latino Representation Shifts in the Proposed Map

Los Angeles County / San Gabriel Valley

Latino-majority representation in Los Angeles County remains robust under the proposed map but becomes more geographically balanced. The greater Los Angeles region trades one concentrated Latino-majority district for broader, multi-district Latino influence. This change will likely promote continued competitiveness and representation for Latino voters in the region.

- **CA-35 (Norma Torres, D)** and **CA-38 (Linda Sánchez, D)** record small declines (−4.3 percentage points in CA-35, and −3 percentage points in CA-38) but remain safely majority-Latino.
- **CA-42 (Robert Garcia, D)** shows the largest Latino CVAP decline statewide, falling from 52 % → 25 % (about a −27 percentage point change). Southeast L.A. County's Latino population is redistributed into nearby districts—especially CA-41 and CA-44—broadening, rather than eliminating, Latino voting power, while CA-42 continues to have Long Beach as its anchor population and making the former mayor of Long Beach, Garcia, likely to win in the new district.
- **CA-44 (Nanette Barragán, D)** gains +11 percentage points, rising to 62% Latino CVAP. This change consolidates South L.A. County and Harbor communities into a stronger Latino majority seat.

Central Valley (Fresno, Kern, Stanislaus, Tulare)

The Central Valley continues to be a cornerstone of Latino political power. Overall, the map deepens Latino representation in agriculture-based counties while extending influence into previously lower-representation areas.

- **CA-13 (Adam Gray, D)** increases from 50.2 % Latino CVAP to about 54% Latino CVAP (approximately a +4 percentage point increase), allowing greater opportunity for Latino voters to choose the winning candidate.
- **CA-20 (Vince Fong, R)** increases from 25.4 % Latino CVAP → 31.8 % Latino CVAP (+6.4 percentage point increase), becoming a new Latino-influence seat.
- **CA-21 (Jim Costa, D)** in the Fresno area has a slight increase in Latino CVAP between the current map and the proposed map, and is a district in which Latino voters' preferred candidates are likely to win in either the current map or the proposed map.

- **CA-22 (David Valadao, R)** climbs from 59.4 % Latino CVAP → 65.4 % Latino CVAP (+6 percentage point change), strengthening its ability for Latino voters to affect the outcome of the election.

Inland Empire (Riverside, San Bernardino, Ontario, Corona)

The Inland Empire emerges as California's new hub of Latino electoral growth. Latino voters are consolidated across Riverside County and the broader area, shifting the region's political center of gravity toward Latino-majority representation.

- **CA-25**, **CA-33**, **CA-35**, **CA-39** are all majority-Latino districts in the Inland Empire region in the current map and in the Proposition 50 map.
- **CA-41 (Ken Calvert, R)** posts the largest statewide gain in the Proposition 50 map—**+25.3 percentage points**, from 29.7% to 55.0% Latino CVAP—transforming into a new majority-Latino district (and moving the district to L.A. County in the Proposition 50 map).

Orange County / San Diego

Latino representation grows markedly in northern Orange County and remains strong along the border. Overall, Orange County's Latino communities, once split among multiple suburban districts prior to this decade now form a more cohesive district in CA-46 in both the current and the proposed map, while San Diego's Latino influence increases in the proposed map in CA-48.

- **CA-46 (Lou Correa, D)** and **CA-52 (Juan Vargas, D)** remain securely majority-Latino in both the current and the proposed maps. In the proposed maps, these two districts are both at or near 53% Latino CVAP, and in the current map both are Latino CVAP majority. CA-46 is centered in Santa Ana and inland Orange County and CA-52 is centered in San Diego and suburban San Diego County communities near the Mexico border.
- **CA-48 (Darrell Issa, R)** rises from 21.4 % → 32.0 % (+10.6 percentage points) in the Proposition 50 map, creating a new Latino-influence district centered on the transportation corridor connecting San Diego County to Temecula and Palm Springs in Riverside County.

Bay Area & Northern California

Latino representation remains smaller in number but steady in influence. Overall, the Bay Area sees continuity rather than major change, maintaining current levels of Latino political presence within multi-ethnic urban districts.

- **CA-18 (Zoe Lofgren, D)** gains modestly (+2.5 percentage points → 53.0 % Latino CVAP) and remains majority-Latino. This was a new Salinas Valley-based Latino

CVAP-majority district created by the Commission in 2020, and it continues with greater Latino CVAP strength in the proposed Proposition 50 map.

- Other Bay Area districts (e.g., CA-12) maintain coalition and crossover-based representation where Latino, Asian-American, and Black voters have the potential to collectively shape outcomes in both the current map and in the proposed map.

Statewide Takeaway

Adopting the proposed Proposition 50 map would largely redistribute—not diminish—Latino voting strength. Latino influence would expand across fast-growing inland and suburban regions while preserving or enhancing long-standing majority-Latino representation in Los Angeles and the Central Valley.

Rather than concentrating Latino voters into a limited number of extremely safe seats, the proposed map broadens their reach into more districts, creating more opportunity for Latino communities to have a decisive and influential voice in a greater share of California's 52 congressional races. This geographic rebalancing reflects the state's ongoing demographic evolution—where Latino population growth in suburban and inland corridors now reshapes the political landscape—making equitable representation increasingly dependent on sustained engagement and turnout among Latino voters statewide.

V. Conclusion

Having examined the data under the current map and the proposed Proposition 50 map, we find that there is no change in the number of Latino-majority CVAP districts across both maps. Each map has 16 Latino-majority districts, meaning there is significant opportunity for Latino representation. We also conclude that—when considering Latino voting patterns in each district—Proposition 50's map increases the number of districts wherein Latino voters are likely to end up on the winning side, electing preferred candidates. In the current map, 14 Latino-majority districts regularly observe candidates preferred by Latino voters winning. In the Proposition 50 map, our data analysis suggests this will likely increase to 16 Latino-majority districts where Latino voters are able to regularly elect their preferred candidates. Because of changes to CD 13 and CD 22, in particular, Proposition 50's map enhances the opportunity for Latino voters' preferred candidates to win, without significantly altering Latino voters' decisive role in the other 14 Latino-majority districts. However, while our analysis suggests that Proposition 50's map is more likely to allow for Latino voters' preferred candidates to win in all 16 Latino-majority districts, we conclude that both the current Commission map and the proposed Proposition 50 map provide significant opportunities for Latino voters.

In terms of Latino-influence districts, the proposed map includes more influence districts than the current map. This increase of two districts could provide opportunities for greater Latino

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representation. Our analysis also suggests that the number of Latino descriptive representatives will likely increase in 2026 if the Proposition 50 map passes, but this does not diminish the fact that Latino descriptive representation was significantly improved by the current map over its predecessor map.

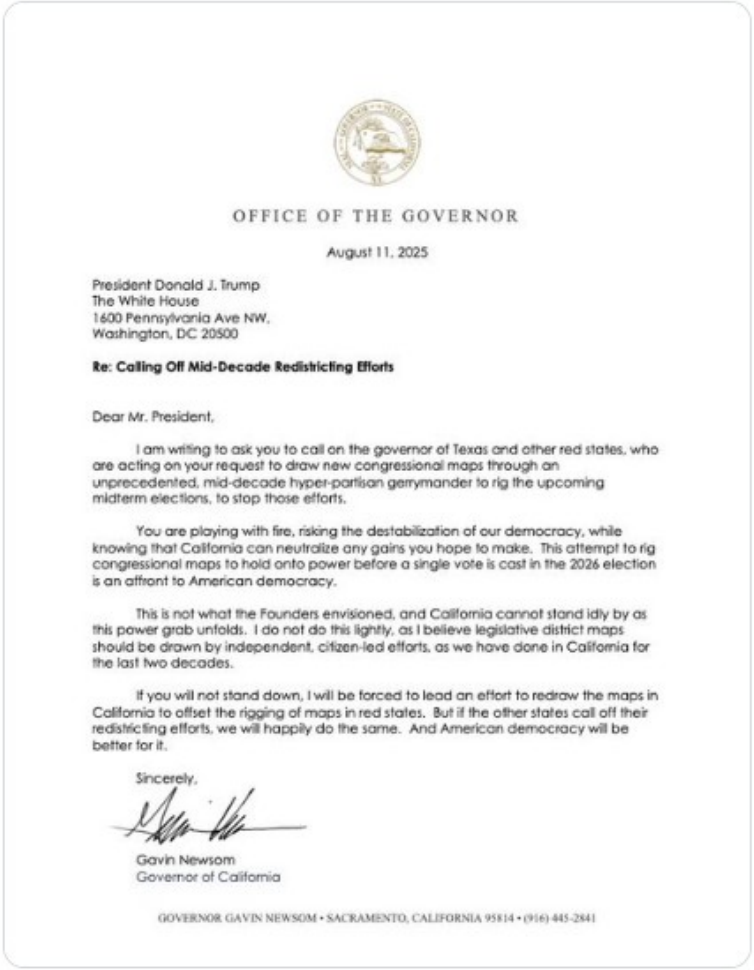
We present this nonpartisan and educational analysis in order to understand how the current and proposed maps would affect Latino voters in California. We also want to emphasize that more research is needed on the effects of redistricting maps on Latino voters and Latino representation. Attempts to increase Latino representation in California have historically occurred via the courts and redistricting. Voters now face a choice at the ballot box that will have implications for the future of Latino representation in California.

Ex. 93

Governor Gavin Newsom
@CAgovernor

.@realDonaldTrump, if you will not stand down, California will be forced to lead an effort to redraw our maps to offset the rigging of maps in red states.

If the other states call off their redistricting efforts, we will do the same. And American democracy will be better for it.



OFFICE OF THE GOVERNOR

August 11, 2025

President Donald J. Trump
The White House
1600 Pennsylvania Ave NW,
Washington, DC 20500

Re: Calling Off Mid-Decade Redistricting Efforts

Dear Mr. President,

I am writing to ask you to call on the governor of Texas and other red states, who are acting on your request to draw new congressional maps through an unprecedented, mid-decade hyper-partisan gerrymander to rig the upcoming midterm elections, to stop those efforts.

You are playing with fire, risking the destabilization of our democracy, while knowing that California can neutralize any gains you hope to make. This attempt to rig congressional maps to hold onto power before a single vote is cast in the 2026 election is an affront to American democracy.

This is not what the Founders envisioned, and California cannot stand idly by as this power grab unfolds. I do not do this lightly, as I believe legislative district maps should be drawn by independent, citizen-led efforts, as we have done in California for the last two decades.

If you will not stand down, I will be forced to lead an effort to redraw the maps in California to offset the rigging of maps in red states. But if the other states call off their redistricting efforts, we will happily do the same. And American democracy will be better for it.

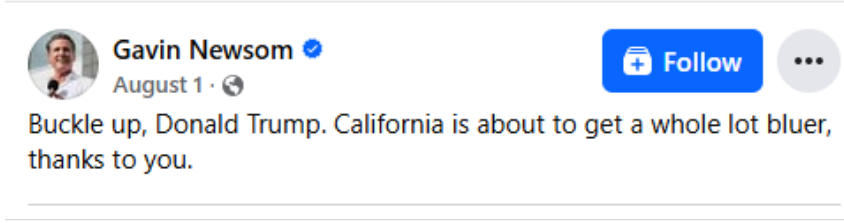
Sincerely,

Gavin Newsom
Governor of California

GOVERNOR GAVIN NEWSOM • SACRAMENTO, CALIFORNIA 95814 • (916) 445-2841

7:07 AM · Aug 11, 2025 · **971.7K** Views

Ex. 101


Gavin Newsom
August 1 ·
Follow
Buckle up, Donald Trump. California is about to get a whole lot bluer, thanks to you.

Ex. 129

Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically RECEIVED on 8/25/2025 10:37:11 AM

Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically FILED on 8/25/2025 by M. Chang, Deputy Clerk

S292592

Case No.

IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA

ASSEMBLYWOMAN KATHRYN SANCHEZ; ASSEMBLYMAN TRI TA; SENATOR SUZETTE VALLADARES; SENATOR TONY STRICKLAND; ERIC CHING; MIKE WARD; ANDREW PANDOL; and ROGER HOLLAND,
Petitioners,

v.

SHIRLEY N. WEBER,
California Secretary of State, In Her Official Capacity,
Respondent,
and
LEGISLATURE OF THE STATE OF CALIFORNIA,
Real Party in Interest.

EMERGENCY PETITION FOR WRIT OF MANDATE OR OTHER EXTRAORDINARY OR IMMEDIATE RELIEF; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATIONS OF MICHAEL A. COLUMBO; SEAN TRENDE; ANDREW PANDOL; AND TONY STRICKLAND

LEGISLATIVE ACTION IN VIOLATION OF CALIFORNIA CONSTITUTION ARTICLE XXI, §§ 1, 2, ARTICLE IV, § 8(a), AND ARTICLE XVIII, § 1

IMMEDIATE RELIEF REQUESTED –
NO LATER THAN SEPTEMBER 08, 2025

MICHAEL A. COLUMBO (SBN: 271283)
MARK P. MEUSER (SBN: 231335)
JESSE FRANKLIN-MURDOCK (SBN: 339034)
DHILLON LAW GROUP INC.
177 Post Street, Suite 700
San Francisco, California 94108
Telephone: (415) 433-1700
Attorneys for Petitioners

DECLARATION OF SEAN P. TRENDE

I, Sean Patrick Trende, declare:

1. I am over the age of eighteen and am competent to testify as to the matters herein. The following is based upon personal knowledge and, if I were called to testify, I would and could competently and accurately testify to the same.

BACKGROUND AND EXPERIENCE

2. I am currently the Senior Elections Analyst at RealClearPolitics. I joined Real Clear Politics in January of 2009 and assumed a fulltime position in March of 2010. Real Clear Politics is a company of approximately 50 employees, with its main offices in Washington D.C. It produces one of the most heavily trafficked political websites in the world, which serves as a one-stop shop for political analysis from all sides of the political spectrum and is recognized as a pioneer in the field of poll aggregation. Real Clear Politics produces original content, including both data analysis and traditional reporting.

3. My main responsibilities with Real Clear Politics consist of tracking, analyzing, and writing about elections. I collaborate in rating the competitiveness of Presidential, Senate, House, and gubernatorial races. As a part of carrying out these responsibilities, I have studied and written extensively about demographic trends in the country, exit poll data at the state and federal level, public opinion polling, and voter turnout and voting behavior. In particular, understanding the way that districts are drawn and how geography and demographics interact is crucial to predicting United States House of Representatives races, so much of my time is dedicated to that task.

4. I am currently a Visiting Scholar at the American Enterprise Institute, where my publications focus on the demographic and coalitional aspects of American politics.

5. I am also a Lecturer at The Ohio State University.

6. I am the author of the 2012 book *The Lost Majority: Why the Future of Government is up For Grabs and Who Will Take It*. In this book, I explore realignment theory. It argues that realignments are a poor concept that should be abandoned. As part of this analysis, I conducted a thorough analysis of demographic and political trends beginning in the 1920s and continuing through modern times, noting the fluidity and fragility of the coalitions built by the major political parties and their candidates.

7. I also co-authored the 2014 *Almanac of American Politics*. The Almanac is considered the foundational text for understanding congressional districts and the representatives of those districts, as well as the dynamics in play behind the elections. My focus was researching the history of and writing descriptions for many of the 2012 districts, including tracing the history of how and why they were drawn the way that they were drawn. I have also authored a chapter in Dr. Larry Sabato's post-election compendium after every election dating back to 2012.

8. I received my Ph.D. in political science at The Ohio State University in 2023. I passed comprehensive examinations in both Methodology and American Politics. The first chapter of my dissertation involves voting patterns on the Supreme Court from 1900 to 1945; the second chapter involves the application of integrated nested LaPlace approximations to enable the incorporation of spatial statistical analysis in the study of United States elections. The third chapter of the dissertation involves the use of communities of interest in redistricting simulations. In pursuit of this degree, I also earned a Master's Degree in Applied Statistics. My coursework for my Ph.D. and M.A.S. included, among other things, classes on G.I.S. systems, spatial statistics, issues in contemporary redistricting, machine learning, non-parametric hypothesis tests and probability theory. I also earned a B.A. from Yale University in history and political science in 1995, a Juris Doctor from Duke University in 2001, and a Master's Degree in political science from Duke University in 2001.

9. In the winter of 2018, I taught American Politics and the Mass Media at Ohio Wesleyan University. I taught Introduction to American Politics at The Ohio State University for three semesters from Fall of 2018 to Fall of 2019, and again in Fall of 2021. In the Spring semesters of 2020, 2021, 2022 and 2023, I taught Political Participation and Voting Behavior at The Ohio State University. This course spent several weeks covering all facets of redistricting: how maps are drawn, debates over what constitutes a fair map, measures of redistricting quality, and similar topics. It also covers the Voting Rights Act and racial gerrymandering claims. I also taught survey methodology in Fall of 2022 and Spring of 2024. In Spring of 2025 I taught Introduction to the Policy Process.

10. A full copy of all cases in which I have testified or been deposed is included on my C.V., attached as Exhibit 1. In 2021, I served as one of two special masters appointed by the Supreme Court of Virginia to redraw the districts that will elect the Commonwealth's representatives to the House of Delegates, state Senate, and U.S. Congress in the following

decade. The Supreme Court of Virginia accepted those maps, which were praised by observers from across the political spectrum. *See, e.g.*, *New Voting Maps, and a New Day, for Virginia*, The Washington Post (Jan. 2, 2022), \ *available at* https://www.washingtonpost.com/opinions/2022/01/02/virginia-redistricting-voting-maps-gerrymander.

11. In 2019, I was appointed as the court's expert by the Supreme Court of Belize. In that case I was asked to identify international standards of democracy as they relate to malapportionment claims, to determine whether Belize's electoral divisions (similar to our congressional districts) conformed with those standards, and to draw alternative maps that would remedy any existing malapportionment.

12. I served as a Voting Rights Act expert to counsel for the Arizona Independent Redistricting Commission in 2021 and 2022.

SCOPE OF WORK

13. I was retained by Petitioners in the above-captioned case, who asked me to compare (1) the Congressional map approved by the California Citizens Redistricting Commission in 2021 for use in the 2022 election ("Commission Map") with (2) the map the legislature created, reflected in Assembly Bill 604 ("Proposed Map").

14. Specifically, I analyzed the contiguity of the two maps as well as the degree to which they separate communities of interest; metrics required by the California Constitution and which demographers commonly employ to analyze maps. I was also asked to examine the two maps using partisan fairness metrics, which are commonly used by demographers and elections analysts when examining legislative maps.

OPINIONS

15. I was asked first to analyze the partisan fairness of the Proposed Map, to determine whether the Districts were "drawn for the purpose of favoring or discriminating against an incumbent, political candidate, or political party." First, it seems obvious that the purpose of this map is to favor one party or the other, as leaders in the state have not been particularly shy that the purpose of the map is to "neutralize" a Republican gerrymander in Texas. *See* Lauren Gambino, "California: Newsom Signs Proposal for New Voting Map Favoring Democrats," *The Guardian* (Aug. 21, 2025), *available at* https://www.theguardian.com/us-

news/2025/aug/21/california-legislature-redistricting-plan. Regardless, there are multiple ways to examine this. Here, I was asked to examine partisan fairness metrics, which examine election outcomes and determine whether there is a bias in favor of one party or the other.

16. As a simple test, I was asked to analyze the competitiveness of districts, which assesses how many swing seats exist. For purposes of this, I was asked to consider a swing seat to be a district where both parties' vote share is between 45% and 55%. Using data from the last four elections, I calculated that 6.5 of 52 seats would be considered swing seats.

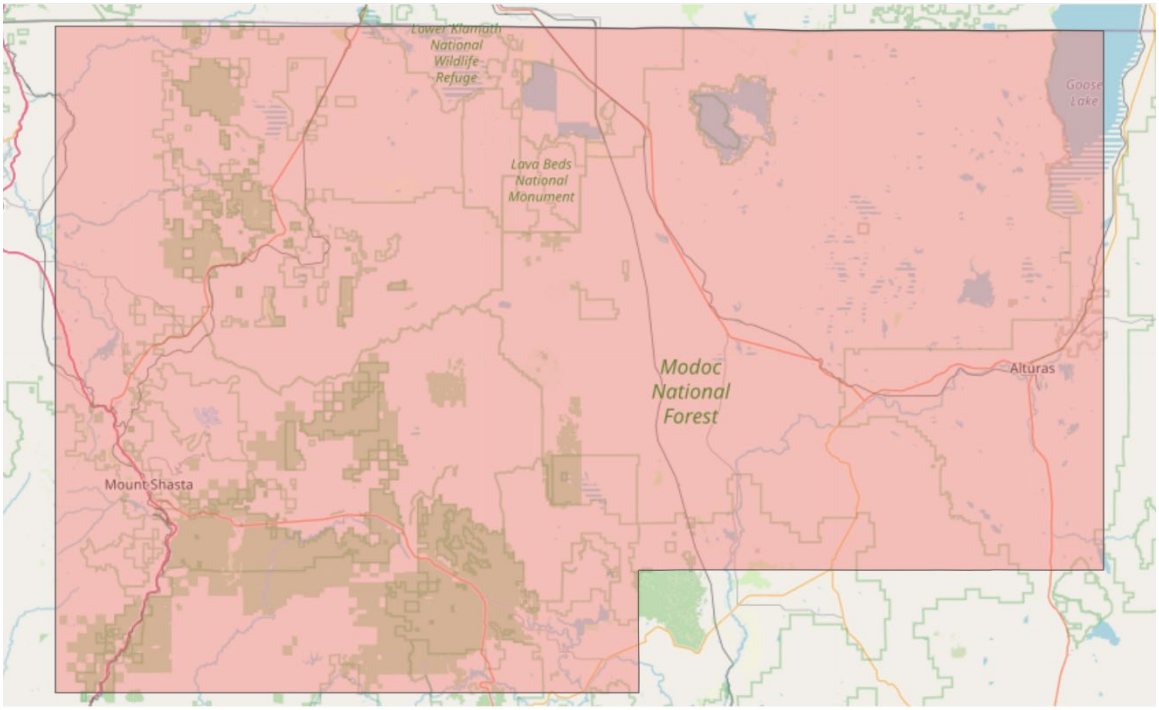
17. I also employed a uniform swing test, which tests the "responsiveness" of a map. That is to say, it examines the effect of a shift of the vote share on the number of seats each party would win under various vote shares. I examined the effect of 5% swings in the electorate in favor of both Democrats and Republicans, and calculated a Uniform Swing Test value of 19.75, suggesting that Democrats would hold nearly 40% of the seats in the state regardless of swings in the electorate.

18. One can also simply analyze shifts in vote share. For example, President Trump, despite winning almost 40% of the two-party vote in the state, would have carried four seats under the Proposed Map. Gov. Gavin Newsom would have lost six seats under this map; under the Commission Map he lost 14. In 2020, President Trump would have won four districts under the Proposed Map; under the Commission Map he won seven.

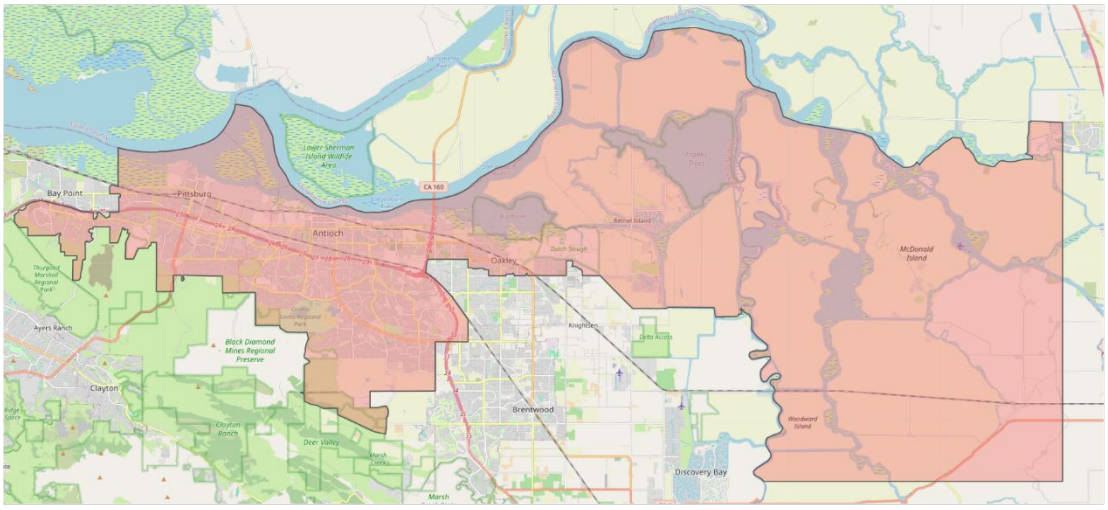
19. Next, I analyzed the districts for contiguity. Although California law is unclear precisely what type of contiguity is required, there are two types of contiguity that are typically considered: "Census" contiguity and "functional" contiguity. Census contiguity simply asks whether all of the blocks in a precinct touch another block in the precinct. Functional contiguity, by contrast, asks whether you can travel through a district without leaving the district.

20. At a minimum, the Proposed Map creates more non-functionally contiguous districts than the Commission Map. In particular, Districts 2, 9, 30, 40 and 47 are no longer functionally contiguous.

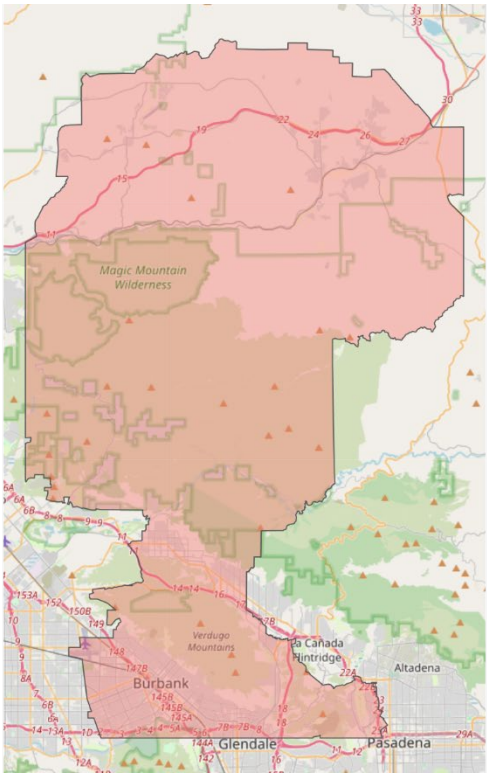
21. In CA-02, a resident cannot travel from Alturas to Weed (to the North of Mt. Shasta) without leaving the district.



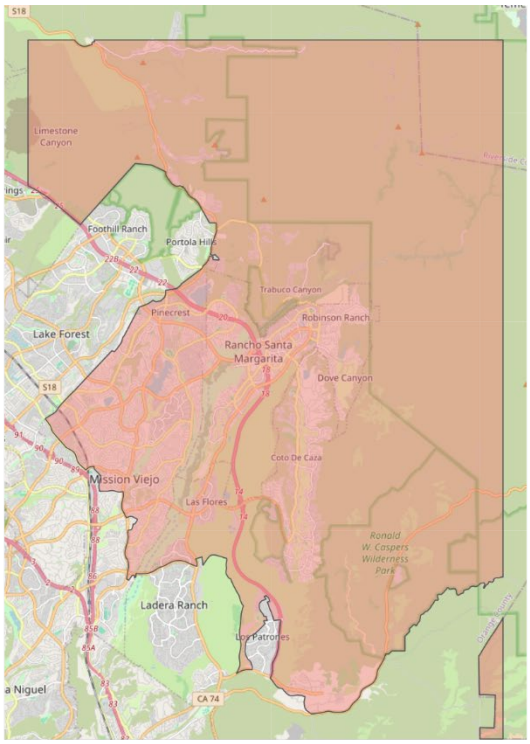
22. In CA-09, a resident cannot travel from Oakley to San Joaquin County without leaving the district; the entire western end of the district is cut off from the remainder of the district; the only bridge across the Old River is well south of the district's boundary.



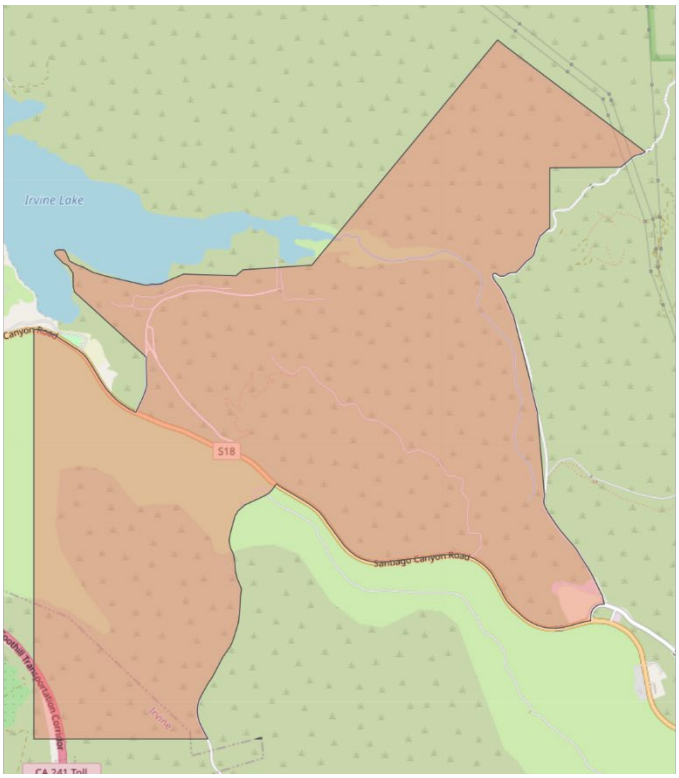
23. In CA-30, a resident cannot travel from the Agua Dulce area north of to Burbank without leaving the district.



24. In CA-40, a resident cannot travel from Rancho Santa Margarita to Murrieta without leaving the district; it is separated from the rest of the district by the Santa Ana Mountains.



25. In CA-47, the area north of Santiago Creek is not functionally contiguous with the rest of the district. The road which could hypothetically connect it to the rest of the district leaves the district near Baker Canyon Rd.



26. Finally, I examined how the Legislature's Map disrupted various communities. For example:

a. The Commission's Map grouped the communities in Walnut, Diamond Bar, and Rowland Heights in a single District. The Proposed Map removes Walnut. Chino Hills remains in another separate district.

b. The Commission's Map groups communities like El Monte, Baldwin Park, Covina, West Covina, and La Puente in the same district. The Proposed Map splits them into two districts.

c. The Proposed Map divides the county seat of San Joaquin County, Stockton, into two districts. San Joaquin County is split into five separate districts.

d. The Commission's Map places Richmond, Pittsburgh, Bay Point, and Antioch in a single district. The Proposed Map splits Bay Point off. The Map also splits Oakley into two districts.

e. The Commission Map only splits two federal recognized Indian Reservations: Agua Caliente and Hopland Rancheria. The Proposed Map splits Agua

Caliente and an additional ten reservations: Campo, La Posta, Mesa Grande, Morongo, Rincon, Round Valley, San Manuel, San Pasqual, Santa Rosa, and Sycuan.

27. Based on my review of the Proposed Map and Commission Map, using quantitative and qualitative measures regularly employed by demographers and political scientists, I conclude that the Proposed Map reduces the contiguity of districts and separates communities of interest in comparison to the Commission Map. I also conclude that the Commission Map was drawn with partisan objectives in mind; in particular it was drawn to improve Democratic prospects in congressional elections in the state and to increase the share of seats that they would expect to win in an election.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on August 25, 2025.

Sean P Trende

Sean P. Trende

EXHIBIT 1

SEAN P. TRENDE
1146 Elderberry Loop
Delaware, OH 43015
strende@realclearpolitics.com

EDUCATION

Ph.D., The Ohio State University, Political Science, 2023. Dissertation titled *Application of Spatial Analysis to Contemporary Problems in Political Science*, September 2023.

M.A.S. (Master of Applied Statistics), The Ohio State University, 2019.

J.D., Duke University School of Law, *cum laude*, 2001; Duke Law Journal, Research Editor.

M.A., Duke University, *cum laude*, Political Science, 2001. Thesis titled *The Making of an Ideological Court: Application of Non-parametric Scaling Techniques to Explain Supreme Court Voting Patterns from 1900-1941*, June 2001.

B.A., Yale University, with distinction, History and Political Science, 1995.

PROFESSIONAL EXPERIENCE

Law Clerk, Hon. Deanell R. Tacha, U.S. Court of Appeals for the Tenth Circuit, 2001-02.

Associate, Kirkland & Ellis, LLP, Washington, DC, 2002-05.

Associate, Hunton & Williams, LLP, Richmond, Virginia, 2005-09.

Associate, David, Kamp & Frank, P.C., Newport News, Virginia, 2009-10.

Senior Elections Analyst, RealClearPolitics, 2010-present.

Columnist, Center for Politics Crystal Ball, 2014-17.

Visiting Scholar, American Enterprise Institute, 2018-present.

BOOKS AND BOOK CHAPTERS

Larry J. Sabato, ed., *The Red Ripple*, Ch. 15 (2023).

Larry J. Sabato, ed., *A Return to Normalcy?: The 2020 Election that (Almost) Broke America* Ch. 13 (2021).

Larry J. Sabato, ed., *The Blue Wave*, Ch. 14 (2019).

Larry J. Sabato, ed., *Trumped: The 2016 Election that Broke all the Rules* (2017).

Larry J. Sabato, ed., *The Surge:2014's Big GOP Win and What It Means for the Next Presidential Election*, Ch. 12 (2015).

Larry J. Sabato, ed., *Barack Obama and the New America*, Ch. 12 (2013).

Barone, Kraushaar, McCutcheon & Trende, *The Almanac of American Politics* 2014 (2013).

The Lost Majority: Why the Future of Government is up for Grabs – And Who Will Take It (2012).

PREVIOUS EXPERT TESTIMONY AND/OR DEPOSITIONS

Dickson v. Rucho, No. 11-CVS-16896 (N.C. Super. Ct., Wake County) (racial gerrymandering).

Covington v. North Carolina, No. 1:15-CV-00399 (M.D.N.C.) (racial gerrymandering).

NAACP v. McCrory, No. 1:13CV658 (M.D.N.C.) (early voting).

NAACP v. Husted, No. 2:14-cv-404 (S.D. Ohio) (early voting).

Ohio Democratic Party v. Husted, Case 15-cv-01802 (S.D. Ohio) (early voting).

Lee v. Virginia Bd. of Elections, No. 3:15-cv-357 (E.D. Va.) (early voting).

Feldman v. Arizona, No. CV-16-1065-PHX-DLR (D. Ariz.) (absentee voting).

A. Philip Randolph Institute v. Smith, No. 1:18-cv-00357-TSB (S.D. Ohio) (political gerrymandering).

Whitford v. Nichol, No. 15-cv-421-bbc (W.D. Wisc.) (political gerrymandering).

Common Cause v. Rucho, No. 1:16-CV-1026-WO-JEP (M.D.N.C.) (political gerrymandering).

Mecinas v. Hobbs, No. CV-19-05547-PHX-DJH (D. Ariz.) (ballot order effect).

Fair Fight Action v. Raffensperger, No. 1:18-cv-05391-SCJ (N.D. Ga.) (statistical analysis).

Pascua Yaqui Tribe v. Rodriguez, No. 4:20-CV-00432-TUC-JAS (D. Ariz.) (early voting).

Ohio Organizing Collaborative, et al v. Ohio Redistricting Commission, et al, No. 2021-1210 (Ohio) (political gerrymandering).

NCLCV v. Hall, No. 21-CVS-15426 (N.C. Sup. Ct.) (political gerrymandering).

Szeliga v. Lamone, Case No. C-02-CV-21-001816 (Md. Cir. Ct.) (political gerrymandering).

In the Matter of 2022 Legislative Districting of the State , Misc. No. 25 (Md. Ct. App.) (political gerrymandering)

Montana Democratic Party v. Jacobsen, DV-56-2021-451 (Mont. Dist. Ct.) (early voting; ballot collection).

Carter v. Chapman, No. 464 M.D. 2021 (Pa.) (map drawing; amicus).

NAACP v. McMaster, No. 3:21-cv-03302 (D.S.C.) (racial gerrymandering).

Alexander v. NAACP, Case No. 3:21-cv-03302-MBS-TJH-RMG (D.S.C.) (racial gerrymandering).

Graham v. Adams, No. 22-CI-00047 (Ky. Cir. Ct.) (political gerrymandering).

Harkenrider v. Hochul, No. E2022-0116CV (N.Y. Sup. Ct.) (political gerrymandering).

LULAC v. Abbott, Case No. 3:21-cv-00259 (W.D. Tex.) (racial/political gerrymandering/VRA).

Moore et al., v. Lee, et al., (Tenn. 20th Dist.) (state constitutional compliance).

Milligan v. Allen, Case No. 2:21-cv-01530-AMM (N.D. Ala.) (VRA).

Nairne v. Ardoin, NO. 22-178-SDD-SDJ (M.D. La.) (VRA).

Robinson v. Ardoin, NO. 22-211-SDD-SDJ (M.D. La.) (VRA).

Republican Party v. Oliver, No. D-506-CV-2022-00041 (N.M. Cir. Ct. (Lea County)) (political gerrymandering).

Palmer v. Hobbs, Case No. 3:22-CV-5035-RSL (W.D. Wash) (VRA; remedial phase only).

Clarke v. Evers, No. 2023AP001399-OA (Wisc.) (Political gerrymandering; remedial phase only).

Stone v. Allen, No. 2:21-cv-1531-AMM (N.D. Ala.) (VRA).

Milligan v. Allen, No. 2:21-cv-01530-AMM (S.D. Ala.) (VRA).

Agee et al. v. Benson, et al., (W.D. Mich.) (racial gerrymandering/VRA).

Faatz, et al. v. Ashcroft, et al., (Cir. Ct. Mo.) (state constitutional compliance).

Coca, et al. v. City of Dodge City, et al., Case No. 6:22-cv-01274-EFM-RES (D. Kan.) (VRA).

Pierce v. NC State Board of Elections, Case No. 4:23-cv-193 (E.D.N.C.) (VRA).

Williams v. Hall, Civil Action No. 23 CV 1057 (M.D.N.C.) (VRA, Racial Gerrymandering).

Hodges v. Passidomo, Case No. 8:24-cv-879-CEH-TPB-ALB (M.D. Fla.) (Racial Gerrymandering).

Cubanos Pa'Lante v. Florida House of Representatives, Case No. 24-cv-21983-JB (S.D. Fla.) (Racial Gerrymandering).

Coads v. Nassau County, Index No. 611872/2023 (N.Y. Sup. Ct., Nassau County) (political gerrymandering, racial gerrymandering, NYVRA).

Harris v. DeSoto County, Civil No. 3:24-CV-00289-GHD-RP (N.D. Miss.) (VRA).

COURT APPOINTMENTS

Appointed as Voting Rights Act expert by Arizona Independent Redistricting Commission (2020)

Appointed Special Master by the Supreme Court of Virginia to redraw maps for the Virginia House of Delegates, the Senate of Virginia, and for Virginia's delegation to the United States Congress for the 2022 election cycle.

Appointed redistricting expert by the Supreme Court of Belize in Smith v. Perrera, No. 55 of 2019 (one-person-one-vote).

INTERNATIONAL PRESENTATIONS AND EXPERIENCE

Panel Discussion, European External Action Service, Brussels, Belgium, Likely Outcomes of 2012 American Elections.

Selected by U.S. Embassies in Sweden, Spain, and Italy to discuss 2016 and 2018 elections to think tanks and universities in area (declined Italy due to teaching responsibilities).

Selected by EEAS to discuss 2018 elections in private session with European Ambassadors.

TEACHING

Introduction to the Policy Process, Spring 2025.

American Democracy and Mass Media, Ohio Wesleyan University, Spring 2018.

Introduction to American Politics, The Ohio State University, Autumns 2018, 2019, 2020, Spring 2018.

Political Participation and Voting Behavior, Springs 2020, 2021, 2022, 2023.

Survey Methodology, Fall 2022, Spring 2024.

PUBLICATIONS

James G. Gimpel, Andrew Reeves, & Sean Trende, "Reconsidering Bellwether Locations in U.S. Presidential Elections," Pres. Stud. Q. (2022) (forthcoming, available online at http://doi.org/10.1111/psq.12793).

REAL CLEAR POLITICS COLUMNS

Full archives available at `http://www.realclearpolitics.com/authors/sean_trende/`

Ex. 131

Attorney General Pamela Bondi
@AGPamBondi

Today @TheJusticeDept sued @CAgovernor over his brazen Proposition 50 redistricting power grab.

Newsom should be concerned about keeping Californians safe and shutting down Antifa violence, not rigging his state for political gain.

From apnews.com

11:00 AM · Nov 13, 2025 · **4.1M** Views

Ex. 143

Vote NO on Prop 50

We Cannot Save Democracy by Burning it Down in California

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NEW
READ THE REPORT

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Accept Decline

Ex. 143

A Threat to California's Landmark Election Reform

For decades, Sacramento politicians drew their own district boundaries behind closed doors with no public oversight — guaranteeing their reelection, denying voters a real choice, and shutting out many women and people of color from elected office.

In 2010, California voters overwhelmingly approved the Voters FIRST Act for Congress — entrusting the independent Citizens Redistricting Commission to draw fair congressional districts.

Now, career politicians want to abolish citizen-drawn maps and put themselves back in charge of redistricting.

Prop 50 creates one of the most extreme partisan gerrymanders in modern American history — creating politician-drawn maps that experts

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Ex. 143

Gerrymandering is wrong in all 50 states

– when political parties subvert the will of the electorate for their own political advantage,

it weakens democracy everywhere.

Join us to help protect democracy.

Vote NO on Gerrymandering and Join the Coalition to Protect the Voters FIRST Act!

VOTE NO ON PROP 50

Protect independent redistricting

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Ex. 143

TAKE ACTION NOW

Who is Charles Munger, Jr.?

Paid for by No on Prop 50 – Protect Voters First, sponsored by Hold Politicians Accountable. Committee's top funder: Charles Munger, Jr.

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Ex. 143

Ex. 157

Date of Hearing: August 19, 2025

ASSEMBLY COMMITTEE ON ELECTIONS
Gail Pellerin, Chair
ACA 8 (Rivas and McGuire) – As Amended August 18, 2025

SUBJECT: Congressional redistricting.

SUMMARY: Provides for the use of new congressional district maps for elections held through 2030 if Texas, Florida, or other states voluntarily put a new congressional map into effect, as specified, and if voters approve this measure. Specifically, **this measure**:

1) Provides that this measure shall be known and may be cited as "The Election Rigging Response Act."

2) Makes various findings and declarations, including the following:

   a) President Donald Trump has called on Republican-led states to undertake an unprecedented mid-decade redistricting of congressional seats to rig the 2026 election before voting begins.

   b) President Trump and Republicans are attempting to gain enough seats through redistricting to rig the 2026 election outcome regardless of how the people vote.

   c) California has long stood as a national leader for fair independent, nonpartisan redistricting.

   d) California calls on all other states to commit to fair and impartial drawing of maps.

   e) The 2026 midterm elections for Congress must be conducted on a level playing field without an extreme and unfair advantage for Republicans.

   f) The people of California, not politicians, should have the power to approve temporary congressional district maps in response to President Trump's election-rigging scheme.

   g) It is the intent of the people that California's temporary maps be designed to neutralize the partisan gerrymandering being threatened by Republican-led states without eroding fair representation for all communities.

3) States the policy of the State of California to support the use of fair, independent, and nonpartisan redistricting commissions nationwide, and declares that the people of California call on Congress to pass federal legislation and propose an amendment to the United States Constitution to require the use of fair, independent, and nonpartisan redistricting commissions nationwide.

4) Requires the single-member districts for Congress reflected in AB 604 (Aguiar-Curry and Lena Gonzalez) to temporarily be used for every congressional election for a term of office commencing after this measure becomes operative, and prior to the operative date of new congressional boundary lines drawn by the Citizens Redistricting Commission (CRC) pursuant to the state constitution. Provides that this provision becomes operative only if

Texas, Florida, or another state adopts a new congressional district map that takes effect after August 1, 2025, and before January 1, 2031, and such redistricting is not required by a federal court order. Provides that this provision becomes operative if Ohio adopts a new congressional district map only if that map is not approved with bipartisan support, as specified.

5) Gives the Attorney General the sole legal standing to defend any action, and gives the California Supreme Court original and exclusive jurisdiction in all proceedings, related to a congressional map adopted pursuant to this measure.

6) Specifies that the CRC shall continue to adjust the boundary lines of the congressional, State Senatorial, Assembly, and Board of Equalization (BOE) districts in conformance with the standards and process set forth in the California Constitution in 2031 and every 10 years thereafter.

7) Contains a severability clause.

EXISTING LAW:

1) Establishes the CRC, and requires it to adjust the boundary lines of the congressional, State Senatorial, Assembly, and BOE districts in the year following the year in which the national census is taken under the direction of Congress at the beginning of each decade, as specified. (California Constitution, Article XXI, §§1 & 2)

2) Provides that the California Supreme Court has original and exclusive jurisdiction in all proceedings in which a CRC-drawn map is challenged. (California Constitution, Article XXI, §3)

3) Permits the Legislature to propose an amendment or revision of the Constitution by a two-thirds vote of each house of the Legislature. Provides that a proposed amendment or revision shall be submitted to the electors and takes effect if approved by a majority of votes cast thereon, as specified. (California Constitution, Article XVIII, §§1 & 4)

FISCAL EFFECT: Unknown.

COMMENTS:

1) **Purpose of the Measure**: According to the author:

> President Trump and Republicans in Texas and other states are attempting to redraw congressional districts mid-decade in an effort to rig the upcoming election to keep their own party in power in Washington. Californians deserve better and demand a response to this undemocratic and un-American power grab. ACA 8 is that response.
>
> ACA 8, also known as the Election Rigging Response Act, would allow for the temporary use of voter-approved congressional district boundaries through the 2030 congressional term if—and only if—Texas or another state chooses to partisanly gerrymander its congressional districts before the 2030 census. With the next census, ACA 8 would return all congressional district line drawing

powers back to the Citizens Redistricting Commission. Importantly, ACA 8 would empower the voters to decide whether to use these temporary congressional district lines if another state decides to redraw its congressional map mid-decade. Additionally, through ACA 8, the voters would call on Congress to pass federal legislation and an amendment to the U.S. Constitution to require fair, nonpartisan, and independent redistricting nationwide.

The Election Rigging Response Act sends a strong message to other states that they cannot play by different rules when it comes to redistricting. It upholds California's values by neutralizing partisan gerrymandering by other states, all while giving voters the final say on the matter.

2) **Redistricting Overview**: "Redistricting" is the process by which the boundaries of districts of a governmental body are adjusted. Redistricting generally occurs at the beginning of each decade following the decennial federal census, when new district lines are adopted based on the census data so that the populations of each district of a governmental body are roughly equal. Over the course of the decade, districts can become significantly unequal in population due to differential growth rates in various locations of a jurisdiction. Redistricting is the way this inequality is corrected.

3) **California Redistricting and the Citizens Redistricting Commission**: The California Legislature last redrew the boundary lines of the congressional, State Senatorial, Assembly, and BOE districts in 2001 based on the results of the 2000 census. Those district lines were finalized and approved in September 2001.

   In 2008, California voters approved Proposition 11, which created the CRC, and gave it the responsibility for drawing district lines for the state Senate, Assembly, and the BOE. It also changed the criteria used when drawing those lines. In 2010, voters approved Proposition 20, which expanded the CRC's duties to include drawing California's congressional districts, and made additional changes to the procedures and criteria to be used by the CRC. The passage of Propositions 11 and 20 meant that the California Legislature did not play a direct role in adopting district boundaries for congressional, legislative, and BOE districts following the 2010 and 2020 federal censuses.

   Under current law, the districts drawn by the CRC after the 2020 census are scheduled to remain in place until the CRC adopts new maps following the 2030 census. Those new districts would take effect for regularly-scheduled elections in 2032 and beyond.

   If this ACA is approved by voters, California could use different districts for its congressional elections as soon as the 2026 statewide elections. Those districts, which are provided for in AB 604 (Aguiar-Curry and Lena Gonzalez) of the current legislative session, would only go into effect if one or more other states also voluntarily conducted mid-decade congressional redistricting. States required to redraw districts because of a federal court order would not trigger California's new congressional district maps. (Ohio must redraw its congressional district maps this year under its state constitution. Ohio's action would trigger the use of California's AB 604 maps only if Ohio adopts its new district maps without bipartisan support, as provided in a specific provision of the Ohio Constitution.)

4) **Mid-Decade Redistricting Efforts in Other States**: As noted above, redistricting normally takes place once a decade, following the federal census. After new maps are adopted, they may be challenged in court. These lawsuits can take years to resolve, and result in revised maps or entirely new plans. Aside from these court-ordered redistricting efforts, it has historically been rare for jurisdictions to undertake major redistricting before the next decennial census.

   On July 9, 2025, Texas Governor Greg Abbott called a special session of the Texas Legislature to begin on July 21. One of the topics for that session was "[l]egislation that provides a revised congressional redistricting plan." Press reports indicate that this topic was added after aides to President Donald Trump urged Texas to redraw its congressional map, following allegations from the United States Justice Department that the existing map could be illegal. President Trump was later quoted as saying that Republicans were "entitled to five more seats" in Texas.[1]

   The Texas Constitution (Article III, Section 40), limits special sessions to 30 days, meaning that the session that began on July 21 could not extend beyond this week. According to news reports, dozens of Democratic legislators left the state to deny the Texas House a quorum, stalling the redistricting effort. The special session was adjourned sine die on August 15 without a new congressional map being adopted, but Governor Abbott immediately called a second special session to begin later the same day. Earlier in the week, Governor Abbott announced that if the special session ended without a quorum, he would "continue to call special session after special session" until the agenda for the special session is enacted.[2]

   Following Texas' push for mid-decade redistricting, press reports suggest that leaders in several other states are considering mid-decade congressional redistricting in time for the 2026 elections, including California, Florida, Illinois, Indiana, Maryland, Missouri, Nebraska, and South Carolina.

5) **Support and Opposition**: At the time this analysis was prepared, the committee had not received position letters specifically addressing this measure. However, the committee has received significant public input through a Redistricting Public Comment portal that was made available on the Committee's website on August 13, 2025. As of 8:00 AM on August 18, 2025, the committee has received more than 13,100 comments through the portal. Many of these submissions cannot be clearly categorized as either supportive of or opposed to the effort to provide new congressional district maps for elections if this measure is approved by voters and other states voluntarily put a new congressional map into effect.

   The arguments summarized below reflect public comments that generally expressed support for, or opposition to, the proposal for California to use new congressional district maps for elections through 2030 if Texas, Florida, or other states voluntarily implement new congressional maps. The positions of organizations and individuals to that proposal generally, however, may not necessarily be the same as their positions on this specific measure, or on other related legislation identified below. For that reason, this analysis refers

[1] https://www.politico.com/news/2025/08/05/trump-texas-redistricting-00493624, visited 8/13/25.
[2] https://gov.texas.gov/news/post/governor-abbott-statement-on-texas-legislature-plan-to-sine-die, visited 8/13/25.

to those perspectives as arguments for or against the broader "Congressional Redistricting Proposal."

a) **Arguments in Support of Congressional Redistricting Proposal**: Organizations and individuals that have submitted public comment in support argue that it is a necessary response to efforts by President Trump, Texas Republicans, and other Republican-led states to redraw congressional maps mid-decade for partisan advantage. They contend that these moves are designed to rig the outcome of the 2026 midterm elections, regardless of how people actually vote, and pose an existential threat to American democracy.

   Backers also emphasize that California voters—not politicians—would ultimately decide whether to approve the proposed new congressional districts. Furthermore, those maps would take effect only if one or more other states voluntarily engages in mid-decade redistricting.

   Finally, many supporters stress their strong commitment to the CRC and to expanding independent redistricting commissions nationwide. They view this proposal as a temporary safeguard, and support it because it preserves the CRC's role in future redistricting efforts.

   The following organizations have submitted public comment in support of the congressional redistricting proposal: AAPI Equity Alliance, Alliance for a Better Community, Altadena Chamber of Commerce, Arab Resource & Organizing Center Action, California Donor Table, Democracy Strategy Partners, Democratic Party of Orange County, Democratic Party of San Fernando Valley, Little Manila Rising, Los Angeles County Young Democrats, Outdoor Outreach, Planned Parenthood Affiliates of California, San Francisco Democratic Party, SEIU California, The Unity Council, TruEvolution, Voices for Progress, and WDN Action.

   Based on submissions that have been reviewed and categorized by committee staff, thousands of public comments have been submitted by individuals in support of the congressional redistricting proposal.

b) **Arguments in Opposition to Congressional Redistricting Proposal**: Organizations and individuals that have submitted public comment in opposition warn that overriding the work of the CRC would set a dangerous precedent and weaken California's commitment to independent redistricting. They stress that political gerrymandering erodes democracy, even when done in response to partisan moves in other states.

   Opponents also raise concerns about the financial burden of a special election, arguing it would strain an already challenged state budget. Many argue that Republicans are already underrepresented in California's congressional delegation compared to the Party's share of the statewide vote. Others indicate that they feel disenfranchised and unrepresented under our current system, and believe that this proposal would exacerbate those issues.

   Finally, critics point out that the proposed maps were released only recently, leaving little time for meaningful public review, analysis, or input on the new district lines before consideration by the Legislature.

The League of Women Voters of California submitted public comment in opposition to the proposal to provide new congressional district maps for elections. Additionally, in late July, prior to the announcement of more details about the congressional redistricting proposal, the following organizations submitted a letter in opposition to an effort that would "dismantle California's Independent Citizens Redistricting Commission and return control over congressional maps to elected officials": California Business Roundtable, California Consumer Advocates for Affordability and Safety, California Hispanic Chamber of Commerce, California Manufacturers and Technology Association, Govern for California, Greater San Fernando Valley Chamber of Commerce, Independent Voter Education, Independent Voter Project, NFIB, Protect the Voters FIRST Act, Simi Valley Chamber of Commerce, The Two Hundred for Homeownership, and United Latinos Action.

Based on submissions that have been reviewed and categorized by committee staff, thousands of public comments have been submitted by individuals in opposition to the congressional redistricting proposal.

6) **Related Legislation**: SB 280 (Cervantes and Pellerin), which is also being heard in this committee today, calls a special statewide election to be held on November 4, 2025, provides for the administration of that election, and provides for this constitutional amendment to be submitted to voters at that election, among other provisions.

   AB 604 (Aguiar-Curry and Lena Gonzalez), which is pending in the Senate Elections & Constitutional Amendments Committee, and which this committee is discussing as an informational item at today's hearing, specifies the boundaries for California's congressional districts that will take effect if the voters approve this measure and if another state voluntary engages in mid-decade congressional redistricting, as specified.

7) **Approval by Voters**: As a constitutional amendment, this measure requires the approval of the voters to take effect.

REGISTERED SUPPORT / OPPOSITION:

See comment #5 above for an explanation about support for and opposition to this measure.

Analysis Prepared by: Ethan Jones / ELECTIONS / (916) 319-2094

Ex. 160

SENATE COMMITTEE ON ELECTIONS AND CONSTITUTIONAL AMENDMENTS

Senator Sabrina Cervantes, Chair
2025 - 2026 Regular

Bill No:	ACA 8	**Hearing Date:**	8/19/25
Author:	Rivas and McGuire		
Version:	8/18/25		
Urgency:		**Fiscal:**	Yes
Consultant:	Carrie Cornwell		

Subject: Congressional redistricting.

DIGEST

This proposed constitutional amendment would, if approved by the voters, implement new congressional districts pursuant to AB 604 (Aguiar-Curry and Gonzalez) that could take effect as soon as the 2026 elections, if Texas or another state redistricts its congressional seats absent a court order to do so. These districts would remain in force until the 2032 election.

ANALYSIS

1) Requires that in the year following the year in which a national census is taken under the direction of Congress at the start of a decade, the Citizens Redistricting Commission (CRC) adjusts the lines of congressional, State Senatorial, Assembly and Board of Equalization districts, pursuant to specified standards and procedures.

2) Creates the CRC in each year ending in the number zero to consist of 14 members, five who are registered with the largest political party in the state; five who are registered with the second largest political party in the state; four who are not registered to either of those parties.

3) Specifies that the CRC shall create single-member districts that comply with the U.S. Constitution and the federal Voting Rights Act, among other requirements.

4) Requires the CRC to issue both map of districts and a report explaining how the maps comply with the constitutional requirements for districts.

5) Places original and exclusive jurisdiction for legal challenges to a map with the California Supreme Court.

This measure asks the people of the State of California to amend Article XXI of the California Constitution to:

1) State the policy of the State of California to support the use of fair, nonpartisan redistricting commissions nationwide and also calls on the Congress of the United States to pass federal legislation and to propose an amendment of the United States Constitution to require the use of fair, nonpartisan, and independent redistricting commissions nationwide.

2) Adopt the maps for congressional districts described in AB 604 (Aguiar-Curry and Gonzalez) to temporarily be used for every congressional election for a term of office commencing on or after the date this measure becomes operative and prior to the operative date of new congressional boundary lines drawn by the CRC following the 2030 national census.

3) Make this provision on the constitution operative only if Texas, Florida, or another state adopts a new congressional district map after August 1, 2025, and prior to January 1, 2031, and such redistricting is not required by a federal court order. A mid-decade congressional redistricting in the State of Ohio will only trigger this measure to take effect if that redistricting creates new congressional districts pursuant to a specified partisan process prescribed in the Ohio State Constitution.

4) Give the California Attorney General sole legal standing to defend any action regarding a congressional district map adopted pursuant to its provisions.

5) Retain with the California Supreme Court original and exclusive jurisdiction for all proceedings in which a congressional map adopted under this measure is challenged.

6) Make clear that the CRC shall continue to adjust the boundary lines of the congressional, State Senatorial, Assembly, and Board of Equalization districts pursuant to its existing standards and processes in 2031, for first use in the 2032 election, and every 10 years thereafter.

7) Make the provisions of this measure severable.

BACKGROUND

Prior to 2011, Article XXI of the California Constitution gave the California Legislature the power to establish district maps for congressional and state offices once every ten years following a U.S. Census.

In November 2008, the voters passed Proposition 11, which amended Article XXI to the California Constitution to create an independent redistricting commission, the CRC, to redistrict State Senatorial, Assembly, and Board of Equalization districts every ten years following a U.S. Census. In November 2010, Proposition 20 passed and added establishing congressional district maps to the duties of the CRC.

The CRC created congressional, State Senatorial, Assembly, and Board of Equalization districts for the first time in 2011 and then again in 2021.

COMMENTS

1) Author's Statement. President Trump and Republicans in Texas and other states are attempting to redraw congressional districts mid-decade in an effort to rig the upcoming election to keep their own party in power in Washington. Californians deserve better and demand a response to this undemocratic and un-American power grab. This measure is that response.

This measure, also known as the Election Rigging Response Act, would allow for the temporary use of voter-approved congressional district boundaries through the 2030 congressional term if—and only if—Texas or another state chooses to gerrymander its congressional districts before the 2030 census. With the next census, this measure would return all congressional district line drawing powers back to the Citizens Redistricting Commission. Importantly, this measure would empower the voters to decide whether to use these temporary congressional district lines if another state decides to redraw its congressional map mid-decade. Additionally, through this proposed constitutional amendment, the voters would call on Congress to pass federal legislation and an amendment to the U.S. Constitution to require fair, nonpartisan, and independent redistricting nationwide.

The Election Rigging Response Act sends a strong message to other states that they cannot play by different rules when it comes to redistricting. It upholds California's values by neutralizing partisan gerrymandering by other states, all while giving voters the final say on the matter.

2) Effective Date. This proposed constitutional amendment would appear on the ballot as Proposition 50 at a special election called by SB 280 (Cervantes and Pellerin) for November 4, 2025. Should this measure pass at that election, the new maps for congressional districts contained in AB 604 would only be used if another state puts into use its own new congressional districts that are not required by a court order or a specific partisan process in Ohio. Thus, California's new congressional district maps could be triggered any time between now and the 2030 election.

3) Support and Opposition. Communications of support and opposition received relate to mid-decade redistricting in general, and not to a specific measure within this legislative package. Supporters in general assert that this legislation is a needed response to the actions others states, specifically Texas, are taking at the urging of President Trump. They also point out that this legislation asks the voters of the state to decide on whether to approve new congressional districts, rather than politicians making the decision. Supporters further note that the legislation reaffirms California's support of independent redistricting commissions both here and nationwide.

Opponents' concerns center on the financial burden of the special election, the short timeframe for public comment on this legislative package, and that California's congressional delegation already includes relatively few Republican members. The League of Women Voters of California (LWV) notes that it stands "entirely apart from political parties on mid-cycle redistricting and squarely in the fight against President Trump's authoritarian and dangerous policies that threaten the civil rights and liberties of all Americans." The LWV here and in other states, however, opposes all attempts to gerrymander congressional lines on a partisan basis.

RELATED/PRIOR LEGISLATION

AB 604 (Aguiar-Curry and Gonzalez) contains the legal descriptions of California congressional districts that would be adopted pursuant to this proposed constitutional amendment.

SB 280 (Cervantes and Pellerin) calls a special election for November 4, 2025, requires the Secretary of State to submit ACA 8 to the voters at that election as Proposition 50, and provides for the conduct of that election.

POSITIONS

Please see comment #3 for more details about support and opposition.

Support: AAPI Equity Alliance
AFSCME California
Alliance for a Better Community
Altadena Chamber of Commerce
Arab Resource & Organizing Center Action
Asian American Drug Abuse Program
Battleground California
CA Church IMPACT
CAUSE Action Fund
California Donor Table
California Federation of Labor Unions, AFL-CIO
California Professional Firefighters
California Teachers Association
Central Valley Immigrant Integration Collaborative
Climate Action Campaign
Democracy Strategy Partners
Democratic Party of Orange County
Democratic Party of San Fernando Valley
Indivisible California: StateStrong (CASS)
Little Manila Rising
Los Angeles County Young Democrats
Outdoor Outreach
Planned Parenthood Affiliates of California
Reproductive Freedom for All California
San Francisco Democratic Party
SEIU California
TruEvolution
UDW/AFSCME Local 3930
United Way Santa Cruz County
The Unity Council
Voices for Progress
WDN Action
Women's March Foundation
Thousands of individuals

Oppose: California Business Roundtable
California Consumer Advocates for Affordability and Safety
California Hispanic Chamber of Commerce
California Manufacturers and Technology Association
Govern for California
Greater San Fernando Valley Chamber of Commerce
Independent Voter Education
Independent Voter Project
NFIB
Protect the Voters FIRST Act
Simi Valley Chamber of Commerce
The Two Hundred for Homeownership
United Latinos Action
Unity Party of California
Thousands of individuals

-- END --

Ex. 172

CADOJ Ex. 172 Video of Hearing, Assembly Elections Committee (August 19, 2025), entire hearing, available at https://www.assembly.ca.gov/media/assembly-elections-committee-20250819

Ex. 184

ROB BONTA
Attorney General of California
ANYA M. BINSACCA
Supervising Deputy Attorney General
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IN THE UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

DAVID TANGIPA, *et al.*,

Plaintiffs,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor

v.

GAVIN NEWSOM, in his official capacity as the Governor of California, *et al.*,

Defendants,

and

DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE,

Defendant-Intervenor.

2:25-cv-10616-JLS-WLH-KKL

DECLARATION OF DR. BERNARD GROFMAN SUPPORTING DEFENDANTS' OPPOSITION TO PLAINTIFFS' AND PLAINTIFF-INTERVENORS' MOTIONS FOR PRELIMINARY INJUNCTION

Judge: Hon. Josephine L. Staton, Hon. Kenneth K. Lee, and Hon. Wesley L. Hsu
Trial Date: None Designated
Action Filed: 11/05/2025

DECLARATION OF BERNARD GROFMAN

I, Dr. Bernard Grofman, declare under penalty of perjury under the laws of the United States of America that the statements in the report attached as Exhibit A to this declaration, and appendices attached to the report, are true and correct to the best of my knowledge.

Executed on December 3, 2025 in Irvine, California.

Bernard Grofman

Dr. Bernard Grofman

EXHIBIT A

TO DECLARATION OF GROFMAN

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INITIAL EXPERT WITNESS REPORT OF BERNARD GROFMAN

I. INTRODUCTION AND EXECUTIVE SUMMARY

I, Bernard Grofman, have prepared this report at the request of the California Department of Justice, Office of the Attorney General in *Tangipa et al. v. Newsom, et al*., No. 2:25-cv-10616 (C.D. Cal. 2025). Attached as Appendix A to this Report are tables that include data informing my analysis in this Report. Attached as Appendix B to this Report is a copy of my curriculum vitae.

As a result of conducting a fact-based evaluation of the Prop 50 map, I conclude that partisanship was the predominant motive in drawing the Prop 50 map, and the map was a fully efficient partisan gerrymander. I further concluded that there was no credible expert witness evidence that race was a predominant motive.

II. BACKGROUND AND QUALIFICATIONS

I am a Distinguished Professor of Political Science Emeritus at the University of California, Irvine. For over a decade I served as the Jack W. Peltason Endowed Chair of Democracy Studies and Distinguished Professor of Political Science at the University of California, Irvine. My research deals primarily with issues of representation, including minority voting rights and party competition.

I am a Fellow of the American Academy of Arts and Sciences. I have an honorary Ph.D. from the University of Copenhagen for my work on the cross-national study of elections and voting rules. I am the recipient of a lifetime achievement award from the American Political Science Association for my work on elections and voting rights. I am co-author of six books with major university presses (Cambridge (4), Oxford (1), Yale (1)) and am the sole author of a book with a commercial press on statistical sampling theory as applied to elections, published in 2025. I am co-editor of 26 other books, (including books with Oxford (3), U. Michigan (4), and Princeton (1)). I have co-authored and single-authored over 300 research articles and book chapters.

I have served as an expert witness in cases involving voting rights in nearly a dozen states for a variety of entities, including the United States Department of Justice, the National Association for the Advancement of Colored People, the Mexican American Legal Defense and Educational Fund, non-partisan redistricting authorities, and the Democratic and Republican parties. Beginning in 2015 I have served as a special master or senior mapping consultant to draw or review remedial maps for six different federal courts, including redrawing a Virginia congressional district and eleven districts in the Virginia House of Delegates, redrawing Virginia congressional and legislative districts again in a subsequent decade, reviewing state legislative districts in Michigan, and redrawing or reviewing districts in local elections in Georgia, Virginia, and Utah. I have also worked as the senior mapping consultant to the special masters appointed by the North Carolina State Supreme Court in a case involving partisan gerrymandering as defined under state law. My work (or work in volumes I have edited) has been cited in about a dozen different United States Supreme Court cases, perhaps most notably in *Thornburg v. Gingles*, 478 U.S. 30 (1986), and in various state and federal court cases.

In early November of 2025, I was asked by the Office of the California Attorney General to prepare an expert report in *Tangipa v. Newsom*, a case concerning a congressional district map that, according to unofficial results, a majority of voters voted in favor of adopting in the referendum conducted on November 4, 2025. I am being compensated at a rate of $700 per hour. All opinions in this report are strictly my own, and my compensation is not contingent on my opinions in this case, nor is my compensation contingent on the outcome of this case.

My extensive familiarity both with cases involving allegations of racial preponderance, *see. e.g.*, *Bethune-Hill v. Viginia Board of Elections*, Civil Action No. 3:14cv852 (2020), and cases involving Section 2, *see, e.g.*, *Thornburg v. Gingles*, 478 U.S. 30 (1986) (especially footnotes 21 and 27), along with my knowledge of the tools used to effectuate gerrymandering,[1] allowed me to prepare an expert witness report within the tight deadlines at this stage of the case.

III. MATERIALS CONSULTED AND METHOD OF ANALYSIS

In reaching conclusions for my evaluations of Plaintiffs' and Plaintiff-Intervenors' allegations of a racially predominant motive and Section 2 non-compliance, I reviewed the following materials: Plaintiffs' complaint (filed November 5, 2025); Plaintiffs' motion for a preliminary injunction and supporting materials (filed November 5, 2025); Plaintiff-Intervenor's complaint in intervention and supporting materials (filed November 13, 2025); Plaintiff-Intervenor's motion for a preliminary injunction and supporting materials (filed November 13, 2025); the reports of Dr. Thomas Brunell and of Dr. Sean Trende, filed by Plaintiffs; replication data for the Brunell and Trende reports; a report titled "Latino Voters and the November 2025 Special Election: Redistricting and Representation" by Dr. Raquel Centeno and Dr. Jarred Cuellar;[2] press releases and media reports to which I cite in the text of this Report, including a NALEO (National Association of Latino Elected and Appointed Officials) Report titled "California's Fast-Growing Latino Electorate: An Election 2024 Portrait;"[3] and I accessed publicly accessible elections data on the California Secretary of State website,[4] and publicly accessible data from the 2020 U.S. Census.

Using Dave's Redistricting App (DRA),[5] I reviewed basic demographic facts and geography, including data on citizen voting age population (CVAP)[6] for the 2021 congressional district map

[1] *See e.g.*, Owen, Guillermo, and Bernard Grofman. 1988. Optimal partisan gerrymandering. Political Geography Quarterly, 7(1):5-22.

[2] Available at https://www.cpp.edu/class/political-science/docs/media/proposition-50.pdf.

[3] Available at https://naleo.org/COMMS/PRA/2024/CA_Latino_Eligible_Electorate_Portrait_-_Final.pdf.

[4] For example, https://elections.cdn.sos.ca.gov/sov/2024-general/ssov/pres-by-political-districts.pdf.

[5] Dave's Redistricting App, or the DRA, is widely used software program that is publicly available at no cost to users. It provides demographic and political data on congressional and legislative maps and allows users to create maps of their own.

[6] Citizen voting age population (CVAP) refers to United Sates population that are both citizens

that was prepared by the California Citizens Redistricting Commission (CRC) and used for elections in 2022 and 2024 (the CRC map), the map submitted by the Democratic Congressional Campaign Committee to the California legislature, and the map offered by the legislature on the Prop 50 Referendum held on November 4, 2025 (Prop 50 map).[7] I reviewed adjusted CVAP data from the California Statewide Database.[8]

IV. WHAT IS A PARTISAN GERRYMANDER?

A *partisan gerrymander* is one that seeks to achieve three goals:

- It can be expected to reduce the number of seats held by the other party.
- It can be expected to preserve and protect the safe seats of its own party.
- It can be expected to shore up the seats of its most if not all of its vulnerable incumbents.

A partisan gerrymander can be thought of as "efficient" if it is likely to achieve these three goals, and as "fully efficient" if it is also drawn in such a fashion that its effects are likely to be durable. Overall, partisan gerrymanders are concerned with efficient distribution of partisan voting strength across districts.

There are four basic tools used to achieve a partisan gerrymander:

a. *cracking* geographic blocs of strength of the opposite party by splitting them across two or more districts, or more generally, redrawing districts by removing some of the voters who support the other party;

b. *reinforcing*, i.e., redrawing districts by adding voters to the district who primarily favor the party in charge of the redistricting (or have special ties to its candidate) to "shore up" vulnerable incumbents of the line-drawing party, or to reduce the election chances of the opposite party in districts presently held by the opposition party;

c. *kidnapping*, i.e., relocating incumbents of the opposite party in a district that deprives them of some or many of their previous voters/supporters and/or effectively forces them

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and of voting age. CVAP data is generated by the Census's American Community Survey (ACS) based on a yearly survey of around 3.5 million addresses, aggregated for greater precision into five-year blocs. In the text and tables, I report CVAP data for the five-year period ending in 2023 from the legislature's current website, and I supplemented that recent data with ACS data on CVAP for the five-year period ending in 2019. While, like the Census, the ACS is conducted by the Census Bureau, the methodologies are different: ACS is a sample survey; the Census is an enumeration. Because it is a sample, ACS data is generally considered reliable only when applied to relatively large geographic areas. No data on citizenship was collected in the 2020 Census.

[7] The data underlying the maps is available at https://aelc.assembly.ca.gov/proposed-congressional-map.

[8] Available at https://statewidedatabase.org/d20/2025_cvap.html and https://statewidedatabase.org/d10/2021_cvap.html.

to compete against a candidate of their own party (*pairing*) if they wish to remain in office; and

d. *packing*, i.e., creating some districts in which the opposite party's electoral support is wasted because those districts are being won overwhelmingly by candidates of the opposite party, and these wasted votes are unavailable to help that party win other districts.

My emphasis in this report is on a fact-based evaluation of the evidence for partisanship as the predominant motive in the map as compared to the evidence for race as the predominant motive in the map. I show that the four basic tools of partisan gerrymandering identified have been used in the Prop 50 map to create an *efficient partisan gerrymander*. Because that partisan gerrymander is expected to be durable, I characterize the map as a *fully efficient partisan* gerrymander.

V. OPINION

In this Report, I first discuss evidence showing that the Prop 50 map had partisan gain as its predominant motivation both overall and in specific districts. I focus on tools that are used to achieve a partisan gerrymander and show that all were skillfully used to create a "fully efficient" partisan gerrymander. I then turn to show that the claims that race is the predominant motive for the Prop 50 map as a whole or for particular districts such as CD 13 are misleading or false. Finally, I include a brief discussion on evidence of motivation. The data supporting the conclusions stated below are provided in the form of Tables 1A-3B in **Appendix A** to this Report, or in material that is cited.[9]

A. Partisanship is the Predominant Motive Underlying the Prop 50 Map, as Judged by its Effects

(1) In potentially competitive districts held by Republican incumbents, on net, Democratic leaning voters were added for partisan purposes, turning five of the nine Republican districts into ones where Democrats have a reasonable chance of success in future congressional elections using the Prop 50 map.[10] In three of these five districts with Republican incumbents (CD 1, CD 3, CD 41), the Cook Political Report[11] forecasts a Democratic victory in 2026, while the

[9] Note that results in most of the tables in Appendix A are reported in terms of percentages of the total vote, not percentage of the two-party vote. Two-party vote shares can be calculated from the data in the tables. Also note that, for simplicity, the labeling of districts is consistent as to number, e.g., CD 1 in the Prop 50 map is being compared to CD 1 in the CRC map, etc. The boundaries of districts with the same number do not match perfectly given the nature of the redraw needed to achieve a partisan gerrymander.

[10] *See* Appendix A, Table 1A.

[11] The Cook Report provides evaluations of the likely outcomes in United States House and Senate Districts and state governorships in both primaries and general elections. These evaluations are regarded as of high credibility based on a long track record. I have cited to two different Cook Reports. *Compare 2026 CPR House Race Ratings*, Cook Political Report with Amy Walter (Nov. 4, 2025), https://www.cookpolitical.com/ratings/house-race-ratings/557146,

Republican-held CD 22 (rated "lean Republican" in 2024), and CD 48 (rated "solid Republican" in 2024) are now labeled as "tossups" under the Prop 50 map.[12]

(2) In several of these Republican held districts, especially the five where the Prop 50 map make it more likely that a Democrat would win in the 2026 election, the lines were substantially redrawn for partisan purposes. CD 41, with the Republican incumbent having his district kidnapped out from under him, is the extreme case. In CD 41, the Democrats were able to generate a result that led to a pairing of Republican incumbents, thus eliminating at least one Republican incumbent using one of the classic tools of partisan gerrymandering identified above.[13]

(3) In three districts where the electoral geography did not readily permit adding Democrats, or where Republican voting strength made it highly unlikely that the district could be turned into a Democratic seat (CD 5, CD 20 and CD 23), either the district was left essentially unchanged, or some Republicans were added to the district. This preserved or reinforced the "packing" of these three districts with Republican voters, thus "wasting" some Republican votes for partisan purposes. Republican votes were also added to CD 40 under the Prop 50 map, converting it from a competitive Republican seat into a seat with excess Republican strength, thus further wasting Republican votes for partisan purposes.[14] Perhaps more importantly, the removal of Republicans into CD 40 helped allow for the creation of CD 41 as a clearly Democratic open seat.[15]

(4) Turning now to the Democratic side of the gerrymandering equation, I find that all eight seats with Democratic incumbents that were competitive seats in terms of 2024 Democratic Presidential vote share had their Democratic vote share raised to improve Democratic chances in these competitive seats.[16] Using Cook Report ratings, I find that five of the eight districts registered an improvement in their chances of success in electing a Democrat in 2026 under the Prop 50 map, as compared to under the CRC map, while the election chances in the three others remain essentially unchanged across the two maps.[17]

(5) The 35 remaining seats with Democratic incumbents averaged a 64.9% Democratic share

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with 2026 CPR House Race Ratings, Cook Political Report with Amy Walter (Nov. 4, 2025), https://www.cookpolitical.com/ratings/house-race-ratings/558166; *see also*, Erin Covey, *California's Newly Passed Map Spurs 11 Ratings Changes*, Cook Political Report with Amy Walter (Nov. 4, 2025), https://www.cookpolitical.com/analysis/house/redistricting/californias-newly-passed-map-spurs-11-ratings-changes (describing changes in the Cook Political Report's ratings—"all but one shifting in Democrats' direction"—in the wake of California Voters approving Prop 50).

[12] *See* Appendix A, Table 3A.

[13] Tom Coulter *After Prop 50 passage, GOP Rep. Ken Calvert will run in new district*, Palm Springs Desert Sun, https://www.desertsun.com/story/news/politics/elections/2025/11/05/prop-50-results-ken-calvert-will-run-in-new-district/87109804007/ (last visited Nov. 27, 2025).

[10] *See* Appendix A, Tables 1A, 3A.

[15] *See* Appendix A, Table1A.

[16] *See* Appendix A, Table 1B.

[17] *See* Appendix A, Table 3B.

of the 2024 Presidential election in the CRC map. These districts were characterized as solid Democratic vis-à-vis the election of 2026 by the Cook Report just prior to the passage of Prop 50.[18] The average Democratic vote share in the 2024 Presidential election in these districts was reduced to 63.1% in the Prop 50.[19] These 35 districts classified by the Cook Report as "solid prior to the passage of Prop 50 under the CRC map , remained solid Democratic seats under the Prop 50 map according to the Cook Report.[20]

(6) The reduction in Democratic strength in districts that were already solid Democratic seats and were kept that way, helped the Democratic gerrymander find enough Democratic votes both to shore up its vulnerable incumbents, and also to expect to pick up a substantial portion of the previously Republican-held districts under the Prop 50 map by increasing the expected Democratic vote share in those districts.[21]

(7) The redistribution of partisan voting strength in this partisan gerrymander made five of the nine Republican-held seats more likely to elect a Democrat, increased (at least slightly) the reelection chances of potentially vulnerable Democrats, while making sure that none of the previously solid Democratic-held seats was going to be anything other than "solid Democratic" in 2026.[22] This combination of different types of benefits for the party doing the gerrymandering effects is the defining hallmark of a successful partisan gerrymander. In sum, the Prop 50 map was a skillfully crafted *efficient* partisan gerrymander in its effects. And given the safety level for a Democratic candidate of almost all the seats, it is a durable partisan gerrymander for the Democrats.[23] In sum, the data in Table 1B and the evaluations of the Prop 50 map in the Cook Political Report shown in Table 3B lead me to characterize the Prop 50 map as a durable partisan gerrymander, as well as an efficient one. Thus, using the terminology introduced above, the Prop

[18] *See* Appendix A, Table 1B, Table 3B and *See* earlier discussion of the Cook Report data.

[19] *See* Appendix A, Table 1B

[20] *See* Appendix A, Table 3B

[21] *See* Appendix A, Tables 1A, 1B, 3A, 3B.

[22] In creating a partisan gerrymander, there is always the danger of the gerrymander backfiring on the party that created it. In a bad election year for the party, some of its own incumbents may be defeated because the margins of support for potentially vulnerable members of their own party were cut too thin in the desire to move party supporters into other districts to turn those districts into ones which the party could win. I have coined the phrase "dummymander" to capture the case where a gerrymander ostensibly drawn to favor one party ends up benefiting the other party (Grofman, Bernard and Thomas Brunell. 2005. "The Art of the Dummymander: The Impact of Recent Redistrictings on the Partisan Makeup of Southern House Seats." In Galderisi, Peter (Ed.) Redistricting in the New Millennium, New York: Lexington Books, pp. 183-199). Because the Prop 50 map protected potentially vulnerable Democratic incumbents, as well as previously safe Democrats, while still registering substantial expected seat gains for the Democrats, it is my assessment that the Prop 50 map is not a dummymander.

[23] See the data in Appendix A, Table 1B and the evaluations of the Prop 50 map in the Cook Political Report shown in Appendix A, Table 3B.

50 map should be labeled a "fully efficient partisan gerrymander" for the Democrats.[24]

B. Evidence that Race was a Predominant Factor in Drawing the Prop 50 Map is Either Flawed or Nonexistent

(8) Based on the 2023 adjusted CVAP data available from the California Statewide Database[25] and used by the legislature in creating the Prop 50 map,[26] there were sixteen Hispanic-majority[27] seats in the CRC map and sixteen in the Prop 50 map.[28] The assertion that there were only 14 in the CRC map, leading to the claim that two new majority Hispanic CVAP seats have been added in the Prop 50 map, is wrong. It conflates Hispanic CVAP majority districts with districts that elect a person who is himself or herself of Hispanic heritage, who is also a Hispanic community's candidate of choice.[29] This is an "apples to oranges" comparison fallacy.

(9) A consistent CVAP metric must be used to compare the CRC map with the Prop 50 map. Failing to do so is an "apples and oranges" comparison, the results of which are statistically meaningless. Such a comparison would occur, for example, if one set of data is used to establish the Hispanic CVAP in the CRC map, while a different set of data is used to establish the Hispanic CVAP in the Prop 50 map, and those two different sets of data were used to compare the change in Hispanic CVAP between the two maps, neglecting the fact that there were changes in Hispanic CVAP over two different time periods.

(10) Since the map under challenge is the Prop 50 map, I largely reference the 2023 CVAP data posted on the legislature's website throughout this Report, because it is the most recent available CVAP data.[30] Using 2023 CVAP data, there are 16 Hispanic majority CVAP districts in both the CRC map and the Prop 50 map. As an alternative metric, in Table 2B in Appendix A to this Report, I also created a consistent measure of Hispanic majority CVAP districts using 2019 CVAP data that was available to the CRC, projecting that metric forward to the Prop 50

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[24] The evaluations of the Prop 50 map in the Cook Political Report are shown in Appendix A, Tables 3A and 3B.

[25] Available at https://statewidedatabase.org/d20/2025_cvap.html.

[26] Available at https://aelc.assembly.ca.gov/proposed-congressional-map.

[27] In this Report, the term "Hispanic" is used to refer to the Hispanic and Latino population. *See* U.S. Census Bureau, *About the Hispanic Population and its Origin*, https://www.census.gov/topics/population/hispanic-origin/about.html (last visited Nov. 29, 2025).

[28] See Table 2A (cf. Table 2B).

[29] A candidate who is himself or herself Hispanic may or may not be elected in a majority Hispanic CVAP, because the Hispanic community's candidate of choice need not be a member of the Hispanic community, or because turnout levels or cohesion levels among Hispanic voters lead to an outcome that is not the preferred outcome of the Hispanic community. On the other hand, even districts that are not majority Hispanic in CVAP may elect candidates who are the candidates of choice of the Hispanic community..

[30] California Senate Elections and Constitutional Amendments Committee, *Proposed Congressional Map*, https://selc.senate.ca.gov/proposed-congressional-map (last visited Nov. 28, 2025).

map. By projecting 2019 CVAP data forward into the Prop 50 map, the results show 16 Hispanic majority CVAP districts in the CRC map using the CRC's CVAP numbers, but only 13 Hispanic majority CVAP districts in the Prop 50 map. The districts that were majority Hispanic CVAP in the CRC map that are no longer majority Hispanic CVAP under the Prop 50 map using 2019 CVAP data are CD 13, CD 25, and CD 46. Two of these were just barely above 50% Hispanic CVAP in the CRC map. In this alternative calculation, there is again no evidence that race was being used in those districts in a predominant fashion in the Prop 50 map since, using this alternative metric, there are now fewer Hispanic majority CVAP districts in the Prop 50 map than in the CRC map.[31]

(11) More generally, looking at all 16 of the Hispanic majority CVAP districts in the Prop 50 map, I find that 10 districts went down in Hispanic CVAP relative to the districts with the same number in the CRC map and only 5 went up, with one district, CD 34, remaining completely unchanged in Hispanic CVAP.

1. Dr. Sean Trende's Report

(12) **CD 13.** The assertion by Dr. Trende that CD 13 exhibits a racially predominant motive is wrong. This claim is based on nitpicking or cherry-picking the data. The configuration of CD 13 in the Prop 50 map is very much politically motivated, namely, to make CD 13 more likely to elect a Democrat in future election. Most importantly, the political effects are not achieved by race conscious means. The Hispanic CVAP share of CD 13 actually goes down from the CRC map to the Prop 50 map, while in contrast, the Democratic share goes up by 3 percentage points in the Prop 50 map compared to the CRC map, using 2023 CVAP data.[32] Moreover, while Dr. Trende highlights in his report a handful of areas where it might have been possible to add to CD 13 White population that was heavily Democratic rather than Hispanic population that was heavily Democratic, he also observes that there were areas where Hispanic population could have been added but was not added.[33] Because we can look at the overall change in Hispanic vote share between the CRC map and the Prop map in CD 13, we can see that the areas highlighted by Dr. Trende are unrepresentative of the overall results, which involve a decline in Hispanic CVAP percentage in the Prop 50 CD 13 as compared to the CRC CD 13.[34] Moreover, in his Report, Dr. Trende acknowledges that the Prop 50 map increased the Democratic vote share in the district compared to the CRC map.[35]

(13) **CD 13 (continued).** Dr. Trende also asserts that it would have been possible to draw a more compact District 13 with fewer Hispanic voters. But of the two standard compactness measures (Reock and Polsby-Popper),[36] Dr. Trende's own data shows the Prop 50 CD 13

[31] *See* Table 2A in Appendix A to this Report for calculations based on 2023 CVAP data. See also Table 2B in Appendix A for calculations based on 2019 CVAP data.

[32] *See* Table 1A in Appendix A to this Report.

[33] Report of Sean Trende at 13, 19.

[34] *See* Table 1B in Appendix A.

[35] Report of Sean Trende at 6.

[36] The Reock and Polsby-Popper scores are the two most commonly used compactness metrics.

superior on one of the two compactness measures, namely the Reock measure. According to Dr. Trende, "The Enacted Map's District 13 has a Reock compactness score of 0.417 and a Polsby-Popper compactness score of 0.205.[37] Dr. Trende's Demonstration District A has a Reock compactness score of 0.412 and a Polsby-Popper score of 0.223.[38] Dr. Trende's Demonstration District B has scores of 0.408 and 0.230, respectively.[39] Dr. Trende's Demonstration District C has scores of 0.411 and 0.242, respectively.[40] Thus the two compactness measures actually point in opposite directions in the compactness comparison between the Prop 50 CD 13 and Dr. Trende's comparison maps. Moreover, the differences in compactness shown above are trivial. And Dr. Trende's attempt to dismiss the compactness of Prop 50 CD 13 completely misses the fact that CD 13 is one of the most compact districts in the Prop 50 map.[41] The Prop 50 CD 13's Reock score puts the Prop 50 version of CD 13 among the top ten most compact districts in that map, out of the 52 districts.[42] The Polsby-Popper score puts the Prop 50 CD 13 among the top 15 districts in compactness in the Prop 50 map.[43]

(14) **CD 13 (continued).** To understand the configuration of CD 13, we must recognize that it touches other districts, which put constraints on how it could be configured. For example, directly north of CD 13 is a Democratic incumbent in the City of Tracy in CD 9. That puts limits on drawing a compact district to the north of Prop 50 CD 13.

(15) **CD 13 (continued).** Dr. Trende's discussion of CD 13 also misses another potentially important point about the relevant politics. Dr. Trende calls attention to the inclusion of the city of Ceres in the Prop 50 map's CD 13—a city which he correctly notes has a high Hispanic CVAP. Dr. Trende uses the 2024 Presidential election results to characterize the city as "Republican territory." But in the other two elections used in his analysis, the 2024 U.S. Senate

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See Richard G. Niemi, Bernard Grofman, Carl Carlucci & Thomas Hofeller, *Measuring compactness and the role of a compactness standard in a test for partisan and racial gerrymandering*, 52 J. Pol. 1155 (1991). The Reock score compares the area of a district to the area of a circle that has the same perimeter as that district, providing a numerical value between 0 and 1. A score closer to 1 indicates a more compact shape, while a lower score suggests irregular or elongated shapes that suggest the map was drawn for political gain. The Polsby-Popper score is calculated as the ratio of the area of a district to the area of a circle whose circumference matches the district's perimeter. This score also ranges from 0 to 1, with 1 indicating a perfectly round district and 0 representing the least compact shape possible.

[37] Report of Sean P. Trende, Ph.D. Section on Demonstration Maps, pp. 38-42.

[38] *Id.*

[39] *Id.*

[40] *Id.*

[41] And, in any case, whatever the Prop 50 CD13's compactness score, I am aware of no requirement to create the most compact district possible. Compactness is not listed as a requirement in the present California State Constitution, nor is it a federal statutory requirement for congressional districts.

[42] Compactness data is taken from Dave's Redistricting App, a mapping program also used by Dr. Trende.

[43] Compactness data is taken from Dave's Redistricting App.

election and the 2018 gubernatorial election,[44] Democratic candidates won the city with 51.8% and 60.0% of the vote, respectively. The city had also consistently voted for Adam Gray in all seven general elections in which he had appeared on the ballot as a member of the General Assembly from District 21. A partisan map drawer could consider the city's historic Democratic lean as well as Gray's history of receiving strong support from the voters in the city and conclude that it would be to the Democrats' partisan advantage to keep Ceres in CD 13.

(16) **CD 9, CD 5, CD 13.** Dr. Trende links the configuration of CD 13 to that of CD 9 and CD 5 (districts to which CD 13 is contiguous) in his argument that CD 13 has been drawn with a race preponderant motive [45] But actually, like CD 13, CD 5 and CD 9, as judged by effects, are both drawn with partisanship as the preponderant motive. Both are part of the Democrats' partisan gerrymandering efforts. CD 9 is a competitive seat that is "shored up" in terms of Democratic vote; CD 5 is a Republican district which was further "packed" with Republican votes, thus wasting those Republican votes.

(17) **CD 9.** CD 9 reflects one of the central goals of an efficient partisan gerrymander, namely a desire to strengthen Democratic incumbents in competitive districts. The Democratic incumbent in CD 9, Representative Josh Harder, won his 2024 election with only 51.8% of the vote, while President Donald Trump carried his district with 49.4% to Kamala Harris's 47.6%. CD 9 is listed as among the vulnerable Democratic seats in Appendix A, Table 1B.

(18) **CD 5.** CD 5 reflects another key aspect of an effective partisan gerrymandering. Based on effects, CD5 in the Prop 50 map makes use of one of the key tools of partisan gerrymandering, namely "packing." Republicans are added to a district that is already safe for Republicans. It is not drawn with race as a preponderant motive. Using 2023 CVAP data, the Hispanic CVAP share of CD 9 actually goes down from the CRC map to the Prop 50 map, while in contrast, the Democratic share goes up by 6 percentage points in the Prop 50 map's CD 9, compared to the CRC map.[46]

2. The Centeno and Cuellar Report

(19) While the Centeno and Cuellar Report contains a number of observations about Hispanic demographics and election preferences in California that are well known to students of Hispanic politics in the state, and which I reference in my observations below, it at no point endorses the claim that race was the preponderant motive in the Prop 50 map.

(20) I wish to call attention to two methodological issues involving the Centeno and Cuellar Report.

(21) First, Table 4 of their report calculates a change in Hispanic CVAP using two different sets of CVAP data, rather than one. The third column in Table 4 of that report provides CVAP for 2023, and the fourth column purports to show the change in Hispanic CVAP between the

[44] Expert Report of Sean P. Trende, Ph.D. Section on Demonstration Maps, pp. 38-42.

[45] *Id.*

[46] See Table 1A in Appendix A.

CRC map and the Prop 50 map.[47] But the calculation in column 4 of Table 4 is not based on a consistent CVAP metric and is thus misleading. The comparison Centeno and Cuellar make in column 4 is based on the 2023 Hispanic CVAP used by the legislature for its Prop 50 calculations, and the 2019 Hispanic CVAP values used by the CRC for the map used in 2022. But, as Centeno and Cuellar themselves note, there continue to have been increases in Hispanic population since the CRC map was drawn.[48] Using these two different sets of data, their Table 4 shows the CVAP in CD 13 increasing by 3.6 percentage points between the CRC and Prop 50 maps. But the result of performing a comparison using only the 2023 CVAP values for both maps yields essentially no change and, indeed, a slight reduction of Hispanic CVAP in CD 13 from 54.0% in the CRC map to 53.8% in the Prop 50 map.[49] Similarly, if both maps are compared using only 2019 CVAP values, the result is that CD 13 has gone down in Hispanic CVAP from 50.2% in the CRC map to 49.5% in the Prop 50 map.[50] Accordingly, the data shown in Table 4 of their report are quite misleading.

(22) A second methodological issue with the Centeno and Cuellar report is how they define "influence districts."[51] The concept of "influence" is a very murky one. From a political science standpoint, it is simply not true that any district below a majority minority population but above, say, a 30% CVAP for a given minority, should be characterized as giving that minority "political influence." At minimum, we would need to know if the incumbent represented the views of a given group, in addition to the overall racial and partisan composition of the district in racial and partisan terms and the partisanship of the incumbents. The present world is hyper-polarized along party lines, and one must carefully evaluate the potential nature of the political influence a given minority group has with a particular incumbent.[52]

3. Brief Discussion of Hispanic Demographics and Electoral Politics in California

(23) There are a number of key demographic and political facts about the Hispanic population in California that help explain how substantial changes in district lines are very likely to involve changes in the Hispanic population in the changed districts.[53] First, Hispanics are the largest single racial or ethnic group in California in terms of population (roughly 40%, according to the 2021 Census), and population is the basis of redistricting. Moreover, Hispanics are a very

[47] Centeno and Cuellar, *Latino Voters and the November 2025 Special Election: Redistricting and Representation* ("Centeno and Cuellar Report"), https://www.cpp.edu/class/political-science/docs/media/proposition-50.pdf 9 (last visited Dec. 1, 2025).

[48] *Id*. at 4.

[49] *See* Table 2A in Appendix A to this Report.

[50] *See* Table 2B in Appendix A to this Report.

[51] *See* Centeno and Cuellar Report at 6.

[52] *See e.g.*, Merrill, Samuel, Bernard Grofman, and Thomas Brunell. 2023. *How Polarization Begets Polarization: Ideological Extremism in the U.S. Congress.* Oxford University Press.

[53] Centeno and Cuellar Report at 9.

substantial portion (nearly 30%) of the state's registered voters.[54] Second, Hispanic voters are solidly Democratic in registration and voting patterns.[55] Third, the Hispanic population and electorate is growing while the overall population of the state is relatively stagnant.[56] Fourth, there are areas of the state which are highly Democratic, but not Hispanic majority, where Hispanic and White and possibly other minor communities will be commingled. In general, Republican areas will have a lower proportion of Hispanics than Democratic areas, because Hispanics are less likely to be Republican than Whites. Thus, seeking to add Democrats to a district, especially in conjunction with removing Republicans from a district, may well increase the Hispanic proportion in the district as an incidental effect of seeking partisan gain.

4. Brief Discussion Regarding Evidence of Intent of Partisan Gerrymandering

(24) The Prop 50 map will have effects that may determine which political party will control the U.S. House of Representatives in 2026, and thus the incentives for partisan gerrymandering in the Prop 50 map were extraordinarily high.

(25) The votes for placing the referendum on the ballots and for the adoption of the map were basically straight party-line voting. The roll call vote on the map adoption in the legislature divided almost purely on party lines. Fifty-six of 60 Democrats in the Assembly voted "yes," in contrast to all 19 Republicans in the Assembly voting "no."[57] Even more strikingly, all 30 Democrats in the State Senate voted "yes" on placing the referendum on the ballot, in contrast to none of the 10 Republicans in the State Senate voting "yes."[58]

(26) Because this case involves a vote to place a redistricting referendum on the ballot, there is also evidence relevant to the underlying motivation for the map that would not ordinarily be found in other cases where there is a claim for a racially predominant motivation to the map drawing. If we look at the amount of money spent on campaigning on Prop 50 by groups favoring a "yes" vote, for example, virtually all of it comes from political groups affiliated with the Democratic party. The largest contributors were committees affiliated with the Democratic

[54] Nearly one of every three (29.6%) California registered voters are Latino. NALEO Report at 17.

[55] In California, 53.5% of Latinos affiliate with the Democratic Party and only one of every six Latino registered voters (16.7%) is registered as Republican, with roughly 30% unaffiliated with either party. NALEO, *California's Fast-Growing Latino Electorate: An Election 2024 Portrait* ("NALEO Report"), https://naleo.org/COMMS/PRA/2024/CA_Latino_Eligible_Electorate_Portrait_-_Final.pdf (last visited Dec. 1, 2025). NALEO is the National Association of Latino Elected and Appointed Officials

[56] "Between 2012 and 2022, California's electorate grew from 23.8 million to 26.1 million. The increase in the Latino eligible electorate—from 6.4 million to 8.5 million—accounted for 92.3% of the state's electorate growth." NALEO Report at 7.

[57] *AB-604 Redistricting: congressional districts (2025-2026): Votes,* Cal. Legis. Info., https://leginfo.legislature.ca.gov/faces/billVotesClient.xhtml?bill_id=202520260AB604 (last visited Dec. 3, 2025).

[58] *Id.*

Party or Democratic officials, labor unions and a handful of individuals.[59] Almost none of the campaign spending on Prop 50 came from groups that directly lobby for or provide legal services to racial or ethnic groups.[60] On the other side, the leader of the No on Prop 50 movement was directly identified with the Republican party.[61]

(27) Public messaging to voters was that the referendum was partisan in nature. For example, the ballot label described the referendum as a "response to Texas's partisan redistricting,"[62] In contrast, there are no statements referring to race or ethnicity in the "Official Voter Information Guide" for the Prop 50 referendum. That guide is distributed to all California voters. The Legislative Analyst's Office's analysis of the ballot measure also described the referendum as a "response to Texas's partisan redistricting." And it also contained no references as to race or ethnicity.[63]

C. Plaintiff-Intervenors' Voting Rights Act § 2 Claim

(28) My Report does not include analysis on this topic because Plaintiff-Intervenors' filings include no relevant facts.

[59] *See* Ballotopedia, *California Proposition 50, Use of Legislative Congressional Redistricting Map Amendment (2025)*, https://ballotpedia.org/California_Proposition_50,_Use_of_Legislative_Congressional_Redistricting_Map_Amendment_(2025) (last visited Dec. 1, 2025).

[60] *Id*.

[61] Jessica Millan Patterson, former chairperson of the California Republican Party, was listed as the principal officer of No on Prop 50 - Stop Sacramento's Power Grab. *Id*.

[62] California Secretary of State, *Proposition 50 Ballot Label*, https://elections.cdn.sos.ca.gov/statewide-elections/public-display/prop-50-ballot-label.pdf (last visited Dec. 3, 2025).

[63] Legislative Analyst's Office, *Proposition 50*, https://lao.ca.gov/BallotAnalysis/Proposition?number=50&year=2025 (last visited Dec. 3, 2025). The Ballot Label in the California Voter Information Guide and the Legislative Analyst's Office characterization of the Prop 50 ballot are identical.

APPENDIX A

Table 1A. Changes in 2023 Adjusted Hispanic CVAP and 2024 Presidential Vote Share in Republican-Held Congressional Districts

CD	**2023 Hispanic CVAP - in CRC Districts**	**2023 Hispanic CVAP - in Prop 50 Districts**	**Major Party Vote Share in 2024 Presidential Election in CRC Districts**		**Major Party Vote Share in 2024 Presidential Election in Prop 50 Districts**	
			Dem	Rep	Dem	Rep
1	16.6%	18.4%	36.1%	61.1%	54.5%	42.3%
3	11.6%	14.5%	46.5%	50.3%	53.4%	43.2%
5	21.0%	23.7%	39.9%	57.6%	38.4%	59.1%
20	28.7%	31.8%	33.7%	64.0%	32.8%	65.0%
22	64.3%	65.4%	45.8%	51.6%	47.8%	49.6%
23	36.1%	37.0%	40.3%	57.1%	39.0%	58.4%
40	20.4%	28.0%	47.2%	49.5%	42.4%	54.6%
41	33.3%	55.0%	45.7%	51.6%	55.5%	41.4%
48	23.9%	32.0%	41.1%	56.4%	50.4%	47.0%

Table 1B. Changes in 2023 Adjusted Hispanic CVAP and 2024 Presidential Vote Share in Democrat-Held Congressional Districts

CD	**2023 Hispanic CVAP - in CRC Districts**	**2023 Hispanic CVAP - in Prop 50 Districts**	**Major Party Vote Share in 2024 Presidential Election in CRC Districts**		**Major Party Vote Share in 2024 Presidential Election in Prop 50 Districts**	
			Dem	Rep	Dem	Rep
9	33.3%	31.0%	47.6%	49.4%	54.1%	42.7%
13	54.0%	53.8%	46.0%	51.3%	48.9%	48.4%
21	56.1%	54.4%	50.6%	46.8%	51.7%	45.7%
25	56.5%	52.1%	50.1%	47.6%	51.8%	46.0%
27	37.0%	39.5%	50.5%	46.6%	53.4%	43.6%
45	24.6%	28.3%	49.3%	47.8%	50.5%	46.6%
47	14.7%	15.3%	50.3%	46.2%	53.2%	43.1%
49	21.7%	18.4%	52.5%	44.7%	54.6%	42.5%
All Other Dem-Held Districts (n=35) (avg)	33.3%	31.9%	64.9%	31.7%	63.1%	33.5%

Table 2A. 2023 Adjusted Hispanic CVAP and 2024 Presidential Vote share in Hispanic CVAP Districts

CD	2023 Hispanic CVAP - in CRC Districts	2023 Hispanic CVAP - in Prop 50 Districts	Major Party Vote Shares in 2024 Presidential Election in CRC Districts		Major Party Vote Shares in 2024 Presidential Election in Prop 50 Districts	
			Dem	Rep	Dem	Rep
13	54.0%	53.8%	46.0%	51.3%	48.9%	48.4%
18	52.8%	53.0%	63.2%	33.7%	62.7%	34.2%
21	56.1%	54.4%	50.6%	46.8%	51.7%	45.7%
22	64.3%	65.4%	45.8%	51.6%	47.8%	49.6%
25	56.5%	52.1%	50.1%	47.6%	51.8%	46.0%
29	55.4%	53.6%	65.8%	31.0%	65.3%	31.6%
31	55.3%	52.2%	56.9%	40.0%	54.6%	42.4%
33	55.8%	54.5%	52.9%	44.2%	53.5%	43.6%
34	54.9%	54.9%	73.1%	22.4%	73.1%	22.4%
35	58.7%	53.1%	53.7%	43.4%	52.4%	44.6%
38	56.5%	52.6%	56.5%	40.4%	54.5%	42.2%
39	54.2%	54.3%	53.3%	43.6%	53.2%	43.7%
41	33.3%	55.0%	45.7%	51.6%	55.5%	41.4%
42	55.1%	24.6%	64.5%	32.0%	55.0%	41.9%
44	52.7%	62.4%	52.7%	31.5%	66.0%	30.8%
46	54.3%	52.7%	57.3%	39.6%	56.5%	40.3%
52	52.1%	51.8%	59.3%	38.1%	57.5%	39.9%

Table 2B. 2019 Adjusted Hispanic CVAP and 2024 Presidential Vote share in Hispanic CVAP Districts

CD	2019 Hispanic CVAP - in CRC Districts	2019 Hispanic CVAP - in Prop 50 Districts	Major Party Vote Shares in 2024 Presidential Election in CRC Districts		Major Party Vote Shares in 2024 Presidential Election in 2024 Districts	
			Dem	Rep	Dem	Rep
13	50.2%	49.5%	46.0%	51.3%	48.9%	48.4%
18	50.5%	50.4%	63.2%	33.7%	62.7%	34.2%
21	53.3%	51.5%	50.6%	46.8%	51.7%	45.7%
22	59.4%	60.7%	45.8%	51.6%	47.8%	49.6%
25	52.5%	48.3%	50.1%	47.6%	51.8%	46.0%
29	54.2%	52.6%	65.8%	31.0%	65.3%	31.6%
31	54.7%	50.2%	56.9%	40.0%	54.6%	42.4%
33	52.5%	51.4%	52.9%	44.2%	53.5%	43.6%
34	56.1%	56.1%	73.1%	22.4%	73.1%	22.4%
35	57.4%	51.6%	53.7%	43.4%	52.4%	44.6%
38	55.6%	52.9%	56.5%	40.4%	54.5%	42.2%
39	51.2%	51.1%	53.3%	43.6%	53.2%	43.7%
41	29.7%	52.9%	45.7%	51.6%	55.5%	41.4%
42	52.3%	22.3%	64.5%	32.0%	55.0%	41.9%
44	51.0%	60.8%	52.7%	31.5%	66.0%	30.8%
46	50.5%	48.8%	57.3%	39.6%	56.5%	40.3%
52	51.1%	51.3%	59.3%	38.1%	57.5%	39.9%

Table 3A. November 2025 Cook Political Report House Ratings of CRC Map and of Prop 50 Map in Republican-Held Congressional Districts[1]

CD	Nov. 2, 2025, Rating of CRC Districts	Nov. 4, 2025, Rating of Prop 50 Districts
1	Solid R	Solid D
3	Likely R	Solid D
5	Solid R	Solid R
20	Solid R	Solid R
22	Lean R	Toss Up
23	Solid R	Solid R
40	Lean R	Solid R
41	Lean R	Solid D
48	Solid R	Toss Up

[1] *Compare 2026 CPR House Race Ratings*, Cook Political Report with Amy Walter (Nov. 4, 2025), https://www.cookpolitical.com/ratings/house-race-ratings/557146, with *2026 CPR House Race Ratings*, Cook Political Report with Amy Walter (Nov. 4, 2025), https://www.cookpolitical.com/ratings/house-race-ratings/558166; *see also*, Erin Covey, *California's Newly Passed Map Spurs 11 Ratings Changes*, Cook Political Report with Amy Walter (Nov. 4, 2025), https://www.cookpolitical.com/analysis/house/redistricting/californias-newly-passed-map-spurs-11-ratings-changes (describing changes in the Cook Political Report's ratings—"all but one shifting in Democrats' direction"—in the wake of California Voters approving Prop 50).

Table 3B. November 2025 Cook Political Report House Ratings of CRC Map and of Prop 50 Map in Democrat-Held Congressional Districts[2]

CD	**Nov. 2, 2025, Rating of 2022 Districts**	**Nov. 4, 2025, Rating of Prop 50 Districts**
9	Lean D	Solid D
13	Toss Up	Toss Up
21	Likely D	Likely D
25	Likely D	Likely D
27	Lean D	Solid D
45	Toss Up	Lean D
47	Lean D	Likely D
49	Likely D	Solid D
All other Dem-held districts	Solid Dem	Solid Dem

[2] *Compare 2026 CPR House Race Ratings*, Cook Political Report with Amy Walter (Nov. 4, 2025), https://www.cookpolitical.com/ratings/house-race-ratings/557146, with *2026 CPR House Race Ratings*, Cook Political Report with Amy Walter (Nov. 4, 2025), https://www.cookpolitical.com/ratings/house-race-ratings/558166; *see also*, Erin Covey, *California's Newly Passed Map Spurs 11 Ratings Changes*, Cook Political Report with Amy Walter (Nov. 4, 2025), https://www.cookpolitical.com/analysis/house/redistricting/californias-newly-passed-map-spurs-11-ratings-changes (describing changes in the Cook Political Report's ratings—"all but one shifting in Democrats' direction"—in the wake of California Voters approving Prop 50).

APPENDIX B

BERNARD NORMAN GROFMAN

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VITA

BERNARD N. GROFMAN, Distinguished Research Professor (Emeritus), University of California, Irvine

EDUCATION

B.S.	University of Chicago, Mathematics (1966)
M.A.	University of Chicago, Political Science (1968)
Ph.D.	University of Chicago, Political Science (1972)

HONORARY DEGREES

2010	Honorary Doctorate in Political Science (*Doctor scientarium politicarum honoris causa)*, University of Copenhagen

MOST RECENT ACADEMIC POSITIONS HELD

2015- 22	Distinguished Professor of Political Science, University of California, Irvine
2008-22	Jack W. Peltason (Bren Foundation) Endowed Chair, University of California, Irvine
2001-22	Adjunct Professor of Economics, University of California, Irvine
2023-	Distinguished Research (Emeritus) Professor of Political Science, University of California, Irvine

FORMER ACADEMIC POSITIONS

1970-71	Instructor, Political Science, SUNY at Stony Brook.
1971-76	Assistant Professor, Political Science, SUNY at Stony Brook
1976-80	Associate Professor of Political Science and Social Psychology, University of California, Irvine
1980-	Professor of Political Science and Social Psychology, University of California, Irvine.
2008-12	Director, Center for the Study of Democracy, UCI Interdisciplinary Organized Research Unit

PROFESSIONAL AFFILIATIONS

American Political Science Association
Public Choice Society
Law and Society Association
American Institute of Parliamentarians

VISITING POSITIONS AND FELLOWSHIPS

1973	Visiting Lecturer (Gastdozent), Department of Political Science (Lehrstuhl für Politische Wissenschaft), University of Mannheim (Summer Semester).
1975	Adjunct Assistant Professor, Applied Mathematics, SUNY at Stony Brook (Spring Semester).
1975-76	Visiting Assistant Professor, School of Social Sciences, University of California, Irvine (Winter and Spring Quarters).
1984	Guest Scholar (Sabbatical), Governmental Studies Program, Brookings Institution (Winter Quarter).
1985	College Visiting Professor, Department of Political Science, University of Washington, Seattle (Spring Quarter).
1985-86	Fellow, Center for Advanced Study in the Behavioral Sciences, Stanford
1989	Visiting Professor, Department of Political Science, University of Michigan (Fall Semester).
1990	Scholar-in-Residence, Institute for Legal Studies, Kansai University, Osaka, Japan (June-July)
1992	Landsdowne Visiting Scholar, Department of Political Science, University of Victoria, Canada (one week)
2001	Fellow, University Institute of Advanced Study and Scholar-in-Residence, University of Bologna, Italy (May-June)
2002	Scholar-in-Residence, Berlin Science Center (Wissenschaft Zentrum) Germany (July)
2003	Gaspar de Portola Scholar-in-Residence, Department of Economics, Pompeu Fabra University, Barcelona (May-June)
2006	Scholar-in-Residence, New York University School of Law (Sept.-Dec.)
2007	Scholar-in-Residence, Institute for Research on Government and Economic Institutions (IRGEI), University of Paris II (Pantheon), France (April-June)
2008	Scholar-in-Residence, Institute for Research on Government and Economic Institutions (IRGEI), University of Paris II (Pantheon), France (April-May)
2008	Official Politics Visitor, Scholar-in Residence, Nuffield College, Oxford University (June)
2009	Scholar-in-Residence, Institute for Research on Government and Economic Institutions (IRGEI), University of Paris II (Pantheon), France (June-July)
2010	Scholar-in-Residence, New York University School of Law (Sept.-Dec.)

VISITING POSITIONS AND FELLOWSHIPS (cont.)

2012-13	Straus Research Fellow, Straus Institute for the Advanced Study of Law and Justice, New York University School of Law (academic year 2012-13)
2013	Official Politics Visitor, Scholar in Residence, Nuffield College, Oxford University (September)
2014	Visiting Collaborative Scholar, Dept. of Economics, Complutense University, Madrid (one week, April)
2014	Visiting Professor, Dept. of Economics, University of Caen, France (May)
2015	Visiting Scholar, Dept. of Political Science, Institute for Advanced Study, Vienna (two weeks, April)
2015	Visiting Scholar, Dept. of Political Science, University of Konstanz, Germany (two weeks, June)
2016	Visiting Scholar, Dept. of Political Science, Central European University, Budapest, Hungary (two weeks, April)
2016	Official Politics Visitor, Scholar-in-Residence, Nuffield College, Oxford University (June -September)
2017	Visiting Scholar, Juan March Institute, University of Carlos III, Madrid (one week, March)
2018	Visiting Scholar-in-Residence, Nuffield College, Oxford University (two weeks, September)
2019	Official Politics Visitor, Scholar-in-Residence, Nuffield College, Oxford University (two weeks, September)
2024	Scholar-in-Residence, University of Auckland, New Zealand (one week, February)
2024	Scholar-in-Residence, Australian National University, Canberra (one week, March)
2024	Scholar-in-Residence, Victoria University, Wellington, New Zealand (one week, March)

BOOKS AND EDITED BOOKS

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(P1) Grofman, Bernard, Lisa Handley and Richard Niemi. Minority Representation and the Quest for Voting Equality. New York: Cambridge University Press, 1992.

(P2) Merrill, Samuel III and Bernard Grofman. A Unified Theory of Voting: Directional and Proximity Spatial Models. New York: Cambridge University Press, 1999.

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(E2) Lijphart, Arend and Bernard Grofman (Eds.), Choosing an Electoral System. New York: Praeger, 1984. (2001 co-recipient of the George Hallett Prize of the Representation and Electoral Systems Section of the American Political Science Association for books with a lasting contribution to the study of electoral systems.

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(E6) Grofman, Bernard N. (Ed.), Political Gerrymandering and the Courts. New York: Agathon Press, 1990.

(E7) Grofman, Bernard and Chandler Davidson (Eds.), Controversies in Minority Voting: The Voting Rights Act in Perspective. Washington D.C.: The Brookings Institution, 1992. (Designated by the Gustavus Myers Center for the Study of Human Rights in North America as one of the outstanding books published in 1992 on intolerance.)

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EDITED JOURNAL SYMPOSIA and MINISYMPOSIA

(J1) 1981. Minisymposium on Voter Turnout. American Politics Quarterly, 9(2).

(J2) 1993. Minisymposium on the 2500th Anniversary of Democracy. PS: Political Science, (September).

(J3) 2005. Symposium on Elections under the French Double Ballot System, co-edited with Michael Lewis-Beck. French Politics 3

(J4) 2005. Symposium on Political Culture, Representation and Electoral Systems in the Pacific Islands, co-edited with Jon Fraenkel, Journal of Commonwealth and Comparative Studies 43.

(J5) 2008. Minisymposium on Runoff Methods, co-edited with Andre Blais and Shaun Bowler. Electoral Studies 27.

(J6) 2012. Minisymposium (in French) on The Legacy of Maurice Duverger, co-edited with Bernard Dolez and Annie Laurent. Revue Internationale de Politique Compareé,

MAJOR RESEARCH GRANTS

2011-12	Monitoring the Nature and Impact of Public Input into the Legislative and Congressional Redistricting Process (Sloan Foundation, $119,756, PI).
2007-09	Political Competition. Social Science and Humanities Research Council of Canada, (SSHRCC #410-2007-2153, $87,290: Associate Investigator: co-PIs, Stanley Winer and J. Stephen Ferris).
1998-01	Collaborative Research on Probabilistic Models of Social Choice. National Science Foundation Program in Methodology Measurement and Statistics, (NSF# SBR-97-30578, $213,000 with Anthony Marley, Co-PI).
1994-95	Electoral Laws, Electoral Lists and Campaigning in the First Non-Racial South African General Election, National Science Foundation, National Science Foundation (NSF# SBR-93- 21864, $39,512, co-PI with Arend Lijphart).
1991-93	The Impact of Redistricting on the Representation of Racial and Ethnic Minorities, The Ford Foundation (#446740-47007, $166,000).
1988-92	Collaborative Research on the Voting Rights Act: Implementation, Effects, and Implications for Law and Society. National Science Foundation Law and Social Sciences Program (NSF SES #88-09392, $231,000, co-PI with Chandler Davidson); Supplementary Grant for Collaborative Research on the Voting Rights Act: The Effects of Changing Electoral Systems on the Election of Women. National Science Foundation Law and Social Sciences Program (NSF SES 88-09392, $8,500, with Chandler Davidson and Susan Welch).

MAJOR RESEARCH GRANTS (cont.)

1987	Ethnic Voting Patterns in Metropolitan Toronto (Social Sciences Humanities Research Council of Canada, $14,480, with Janet Landa and Michael Copeland.
1985-87	The Dynamics of Spatial Voting Games and Games on Graphs, National Science Foundation, Decision and Management Sciences Program (NSF SES #85-06376, $99,300, with Guillermo Owen).
1985-86	The Impact of Laws Relating to Elections and Representation, National Science Foundation, Political Science Program (NSF SES #85-15468, $23,200).
1983-84	Analysis of the Multnomah Jury Archive, National Science Foundation, Law and Social Sciences Program (NSF SES #82-18588, $35,000).
1981-83	Reapportionment and Representation. National Science Foundation, Political Science Program (NSF #SES 81-07554, $49,970 with Guillermo Owen)
1980-82	Applications of Game Theory to the Study of Political Institutions. National Science Foundation, Political Science Program (NSF #SES 80-07915, $31,300 with Guillermo Owen)
1978-79	Modeling Jury Decision Processes: The Multnomah Jury Archive, National Science Foundation, Law and Social Sciences Program (NSF SOC 77-24702, $73,800). $8,000 funding provided by the American Bar Association).
1978-79	Electoral System: What Difference Does it Make? National Science Foundation, Political Science Program (NSF SOC 77-24474, $35,800, with Howard Scarrow).
1976-77	Modeling Jury Decision Processes, National Science Foundation, Law and Social Sciences Program (NSF SOC 75-l409l, $68,200).

PROFESSIONAL HONORS AND AWARDS

2017	Recipient, Charles Merriam Award of the American Political Science Association for lifetime achievement in the field of applied public Policy (awarded biennially)
2001-	Fellow, American Academy of Arts and Sciences
2000-02	President, Public Choice Society
1991-93	Chair, Section on Representation and Electoral Systems, American Political Science Association.
1982-85	Co-Chair, Conference Group on Representation and Electoral Systems, American Political Science Association.

UNIVERSITY OF CALIFORNIA RESEARCH AND TEACHING HONORS AND AWARDS

2005 University of California, Irvine Academic Senate Distinguished Faculty Award for Research
2001 Lauds and Laurels Award for Faculty Achievement, UCI Alumni Association.
1997 The campus-wide winner, Award for Teaching Innovation and Excellence: UCI Dean for Undergraduate Education.
1996 The School of Social Sciences winner, Award for Teaching Innovation and Excellence: UCI Dean for Undergraduate Education.
1995 Lauds and Laurels Award for Professional Achievement, UCI Alumni Asssociation

CONFERENCE PAPER AWARDS

2003 Co-recipient (with Timothy Brazill) of the Duncan Black Prize of the Public Choice Society for best paper published in Public Choice in 2002, ("Identifying the Median Justice on the Supreme Court through Multi-Dimensional Scaling: Analysis of the 'Natural Courts" 1953-1991")
1985 Co-recipient (with Philip Straffin) of the Carl B. Allendoerfer Award, Mathematical Association of America, for exposition in mathematical Writing for undergraduates (Best paper, Mathematics Magazine).
1979 Pi Sigma Alpha Award, Best Paper, Annual Meeting of the Midwest Political Science Association.

LISTINGS

Who's Who in the World. Providence, NJ: Marquis, various yearly editions beginning in 1998.

American Political Scientists: A Dictionary. Glenn H. Utter and Charles Lockhart (Eds.) Westport, CT: Greenwood Press, 2002, pp. 138-140.

Directory of American Scholars, 10th ed. Gale Group, 2002.

Rowley, Charles K. and Friedrich Schneider. Encyclopedia of Public Choice. Vol. 1. 2004. Kluwer Academic Publishers, Dordrecht/Boston/London. Grofman Biography, pp. 355-356

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(1) Grofman, Bernard N., and Edward Muller. 1973. The strange case of relative gratification and potential for political violence: The V-curve. American Political Science Review, 67:5l4-539.

(2) Grofman, Bernard N., and Gerald Hyman. 1973. Probability and logic in belief systems. Theory and Decision, 4:l79-l95.

(3) Grofman, Bernard N. 1974. Helping behavior and group size, some exploratory stochastic models. Behavioral Science, l9:2l9-224.

(4) Grofman, Bernard N., and Gerald Hyman. 1974. The logical foundations of ideology. Behavioral Science, l9:225-237.

(5) Grofman, Bernard N. 1975. The prisoner's dilemma game: Paradox reconsidered. In Gordon Tullock (Ed.), Frontiers of Economics, 1:101-119.

(6) Mackelprang, A. J., Bernard N. Grofman, and N. Keith Thomas. Electoral change and stability: Some new perspectives. 1975. American Politics Quarterly, 3(3):3l5-339.

(7) Grofman, Bernard N. 1975. A review of macro-election systems. In Rudolph Wildenmann (Ed.), German Political Yearbook (Sozialwissenschaftliches Jahrbuch fur Politik), Vol. 4, Munich Germany: Gunter Olzog Verlag, 303-352.

(8) Grofman, Bernard N., and Jonathan Pool. 1975. Bayesian models for iterated prisoner's dilemma games. General Systems, 20:l85-l94.

(9) Grofman, Bernard N. 1976. Not necessarily twelve and not necessarily unanimous: Evaluating the impact of Williams v. Florida and Johnson v. Louisiana. In Gordon Bermant, Charlan Nemeth and Neil Vidmar (Eds.), Psychology and the Law: Research Frontiers. Lexington, MA: D.C. Heath, l49-l68.

(10) Grofman, Bernard N. 1977. Jury decision-making models. In Stuart Nagel (Ed.), Modeling the Criminal Justice System, Sage Criminal Justice Systems Annuals, Vol. 7, Beverly Hills: Sage Publications, l9l-203.

(11) Grofman, Bernard N., and Jonathan Pool. 1977. How to make cooperation the optimizing strategy in a two-person game. Journal of Mathematical Sociology, 5(2):l73-l86.

(12) Grofman, Bernard N. 1978. Judgmental competence of individuals and groups in a dichotomous choice situation. Journal of Mathematical Sociology, 6(1):47-60.

PROFESSIONAL ARTICLES (in print) (cont.)

(13) Grofman, Bernard N., and Howard Scarrow. 1979. *Iannucci* and its aftermath: The application of the Banzhaf Criterion to weighted voting in the State of New York. In Steven Brams, Andrew Schotter and Gerhard Schwodiauer (Eds.), Applied Game Theory. Vienna: Physica-Verlag, 168-183.

(14) Grofman, Bernard N. 1980. A preliminary model of jury decision making. In Gordon Tullock (Ed.), Frontiers of Economics, Vol. 3, 98-110.

(15) Grofman, Bernard N. 1980. Jury decision-making models and the Supreme Court: The jury cases from Williams v. Florida to Ballew v. Georgia. Policy Studies Journal, 8(5):749-772.

(16) Grofman, Bernard N. 1980. The slippery slope: Jury size and jury verdict requirements--legal and social science approaches. Law and Politics Quarterly, 2(3):285-304.

(17) Grofman, Bernard N., and Howard Scarrow. 1980. Mathematics, social science and the law. In Michael J. Saks and Charles H. Baron (Eds.), The Use/Nonuse/Misuse of Applied Social Research in the Courts. Cambridge, MA: Abt Associates, 117-127.

(18) Grofman, Bernard N. 1981. Mathematical models of juror and jury decision making: the state of the art. In Bruce D. Sales (Ed.), Perspectives in Law and Psychology, Volume II: The Trial Processes. NY: Plenum, 305-351.

(19) Grofman, Bernard N. 1981. The theory of committees and elections: The legacy of Duncan Black. In Gordon Tullock (Ed.), Toward a Science of Politics: Essays in Honor of Duncan Black. Blacksburg, VA: Public Choice Center, Virginia Polytechnic Institute and State University, 11-57.

(20) Weisberg, Herbert and Bernard N. Grofman. 1981. Candidate evaluations and turnout. American Politics Quarterly, 9(2):197-219.

(21) Grofman, Bernard N. and Howard Scarrow. 1981. Weighted voting in New York. Legislative Studies Quarterly, 6(2):287-304.

(22) Grofman, Bernard N. 1981. Alternatives to single-member plurality districts: Legal and empirical issues. Policy Studies Journal, 9(3): 875-898. (Reprinted in Bernard Grofman, Arend Lijphart, Robert McKay and Howard Scarrow (Eds.), Representation and Redistricting Issues. Lexington, MA: Lexington Books, 1982, 107-128.

(23) Taagepera, Rein and Bernard N. Grofman. 1981. Effective size and number of components. Sociological Methods and Research, 10:63-81.

PROFESSIONAL ARTICLES (in print) (cont.)

(24) Landa, Janet, and Bernard N. Grofman. 1981. Games of breach and the role of contract law in protecting the expectation interest. Research in Law and Economics Annual, 3:67-90.

(25) Grofman, Bernard N. 1982. A dynamic model of protocoalition formation in ideological n-space. Behavioral Science, 27:77-90.

(26) Grofman, Bernard N., Scott L. Feld, and Guillermo Owen. 1982. Evaluating the competence of experts, pooling individual judgements into a collective choice, and delegating decision responsibility to subgroups. In Felix Geyer and Hans van der Zouwen (Eds.), Dependence and Inequality. NY: Pergamon Press, 221-238.

(27) Grofman, Bernard N. 1982. Reformers, politicians and the courts: A preliminary look at U.S. redistricting in the 1980s. Political Geography Quarterly, 1(4):303-316.

(28) Grofman, Bernard N. and Howard Scarrow. 1982. Current issues in reapportionment. Law and Policy Quarterly, 4(4): 435-474.

(29) Grofman, Bernard N. and Guillermo Owen. 1982. A game theoretic approach to measuring degree of centrality in social networks. Social Networks, 4:213-224.

(30) Grofman, Bernard N., Guillermo Owen and Scott L. Feld. 1983. Thirteen theorems in search of the truth. Theory and Decision, 15:261-278.

(31) Grofman, Bernard N. 1983. Measures of bias and proportionality in seats-votes relationships. Political Methodology, 9:295-327.

(32) Grofman, Bernard N. and Janet Landa. 1983. The development of trading networks among spatially separated traders as a process of proto-coalition formation: the Kula trade. Social Networks, 5:347-365.

(33) Owen, Guillermo and Bernard N. Grofman. 1984. Coalitions and power in political situations. In Manfred Holler (Ed.), Coalitions and Collective Action. Wuerzburg: Physica-Verlag, 137-143.

(34) Grofman, Bernard N. 1984. The general irrelevance of the zero sum assumption in the legislative context. In Manfred Holler (Ed.), Coalitions and Collective Action. Wuerzburg: Physica-Verlag, 100-112.

(35) Glazer, Amihai, Deborah Glazer, and Bernard N. Grofman. 1984. Voting in corporate elections: Introducing strategy into the equations. South Carolina Law Review, 35(2):295-309.

PROFESSIONAL ARTICLES (in print) (cont.)

(36) Feld, Scott L. and Bernard N. Grofman. 1984. The accuracy of group majority decisions in groups with added members. Public Choice, 42: 273-285.

(37) Owen, Guillermo and Bernard N. Grofman. 1984. To vote or not to vote: The paradox of nonvoting. Public Choice, 42:311-325.

(38) Shapley, Lloyd S. and Bernard N. Grofman. 1984. Optimizing group judgmental accuracy in the presence of interdependencies. Public Choice, 43(3):329-343.

(39) Grofman, Bernard N., Michael Migalski, and Nicholas Noviello. 1985. The `totality of circumstances' test in Section 2 of the 1982 extension of the Voting Rights Act: A social science perspective. Law and Policy, 7(2):209-223.

(40) Grofman, Bernard N. Criteria for districting: A social science perspective. 1985. UCLA Law Review, 33(1):77-184.

(41) Grofman, Bernard and Carole Uhlaner. 1985. Metapreferences and reasons for stability in social choice: Thoughts on broadening and clarifying the debate. Theory and Decision, 19:31-50.

(42) Taagepera, Rein and Bernard Grofman. 1985. Rethinking Duverger's Law: Predicting the effective number of parties in plurality and PR systems--parties minus issues equals one. European Journal of Political Research, 13:341-352. (Reprinted in J. Paul Johnston and Harvey E. Pasis (Eds.). Representation and Electoral Systems: Canadian Perspectives. Englewood City, N.J.: Prentice Hall, 1988.)

(43) Niemi, Richard, Jeffrey Hill and Bernard Grofman. 1985. The impact of multimember districts on party representation in U.S. state legislatures. Legislative Studies Quarterly, 10(4):441-455.

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(47) Grofman, Bernard, Guillermo Owen, Nicholas Noviello and Amihai Glazer. 1987. Stability and centrality of legislative choice in the spatial context. American Political Science Review, 81(2):539-553.

(48) Grofman, Bernard N. Models of voting. 1987. In Samuel Long (Ed.), Micropolitics Annual, Greenwich, CT: JAI Press, 31-61.

(49) Glazer, Amihai, Bernard Grofman and Marc Robbins. 1987. Partisan and incumbency effects of 1970s congressional redistricting. American Journal of Political Science, 30(3):680-701. (Reprinted in Susan A. McManus (Ed.), Reapportionment and Representation in Florida, Lake Geneva, Wisconsin: Paladin House, 1991.)

(50) Feld, Scott L., Bernard Grofman, Richard Hartley, Mark O. Kilgour and Nicholas Miller. 1987. The uncovered set in spatial voting games. Theory and Decision, 23:129-156.

(51) Feld, Scott L. and Bernard Grofman. 1987. Necessary and sufficient conditions for a majority winner in n-dimensional spatial voting games: An intuitive geometric approach. American Journal of Political Science, 32(4):709-728.

(52) Owen, Guillermo and Bernard Grofman. 1988. Optimal partisan gerrymandering. Political Geography Quarterly, 7(1):5-22.

(53) Schofield, Norman, Bernard Grofman and Scott L. Feld. 1988. The core and the stability of group choice in spatial voting games. American Political Science Review, 82)(1):195-211.

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(55) Brace, Kimball, Bernard Grofman, Lisa Handley, and Richard Niemi. 1988. Minority voting equality: The 65 percent rule in theory and practice. Law and Policy, 10(1):43-62.

(56) Feld, Scott L. and Bernard Grofman. 1988. Ideological consistency as a collective phenomenon. American Political Science Review, 82(3):64-75.

PROFESSIONAL ARTICLES (in print) (cont.)

(57) Grofman, Bernard and Michael Migalski. 1988. Estimating the extent of racially polarized voting in multicandidate elections. Sociological Methods and Research, 16(4):427-454.

(58) Grofman, Bernard, Scott L. Feld and Guillermo Owen. 1989. Finagle's law and the Finagle point, a new solution concept for two-candidate competition in spatial voting games. American Journal of Political Science, 33(2):348-375.

(59) Grofman, Bernard and Lisa Handley. 1989. Black representation: Making sense of electoral geography at different levels of government. Legislative Studies Quarterly, 14(2):265-279.

(60) Feld, Scott L., Bernard Grofman and Nicholas Miller. 1989. Limits on agenda control in spatial voting games. Mathematical and Computer Modelling, 12(4/5):405-416. (Reprinted in Paul E. Johnson (Ed.), Mathematical Modelling in Political Science. Oxford: Pergamon Press, 1989.)

(61) Erfle, Stephen, Henry McMillan and Bernard Grofman. 1989. Testing the regulatory threat hypothesis: Media coverage of the energy crisis and petroleum pricing in the late 1970s. American Politics Quarterly, 17(2):132-152.

(62) Miller, Nicholas, Bernard Grofman and Scott L. Feld. 1989. The geometry of majority rule. Journal of Theoretical Politics, 1(4):379-406.

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(64) Grofman, Bernard N. 1990. Toward a coherent theory of gerrymandering: Bandemer and Thornburg. In Bernard Grofman (Ed.), Political Gerrymandering and the Courts. New York: Agathon Press, 29-63.

(65) Erfle, Stephen, Henry McMillan and Bernard Grofman. 1990. Regulation via threats: politics, media coverage and oil pricing decisions. Public Opinion Quarterly, 54(1):48-63.

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(67) Feld, Scott L. and Bernard Grofman. 1990. Collectivities as actors. Rationality and Society, 2(4):429-448.

PROFESSIONAL ARTICLES (in print) (cont.)

(68) Hall, Richard L. and Bernard Grofman. 1990. The committee assignment process and the conditional nature of committee bias. American Political Science Review, 84(4):1149-1166.

(69) Grofman, Bernard, and Lisa Handley. 1991. The impact of the Voting Rights Act on black representation in southern state legislatures. Legislative Studies Quarterly, 16(1):111-127.

(70) Feld, Scott L. and Bernard Grofman. 1991. Incumbency advantage, voter loyalty and the benefit of the doubt. Journal of Theoretical Politics, 3(2):115-137.

(71) Grofman, Bernard. 1991. Statistics without substance: A critique of Freedman et al. and Clark and Morrison. Evaluation Review, 15(6): 746-769.

(72) Grofman, Bernard and Lisa Handley. 1992. Identifying and remedying racial gerrymandering. Journal of Law and Politics, 8(2):345-404.

(73) Grofman, Bernard and Scott L. Feld. 1992. Group decision making over multidimensional objects of choice, Organizational Behavior and Human Performance, 52:39-63.

(74) Grofman, Bernard. 1992. Expert witness testimony and the evolution of voting right case law. In Bernard Grofman and Chandler Davidson (Eds.), Controversies in Minority Voting: The Voting Rights Act in Perspective. Washington, D.C.: The Brookings Institution, 197-229.

(75) Grofman, Bernard. 1992. What happens after one person-one vote: Implications of the U.S. experience for Canada" in John Courtney and David Smith (Eds.), Drawing Boundaries, Saskatoon, Saskatchewan: Fifth House Publishers, 156-178; translated into French, Que se passe-t-il après “une personne, une voix”? L’expérience Américaine, for Chief Electoral Officer of Canada, Elections Canada.. (An earlier and shorter version appeared as “An expert witness perspective on continuing and emerging voting rights controversies: From one person, one vote to political gerrymandering.” Stetson University Law Review, 1992, 21(3):783-818.)

(76) Grofman, Bernard. 1993. Would Vince Lombardi have been right if he had said, `When it comes to redistricting, race isn't everything, it's the only thing'? Cardozo Law Review, 14(5):1237-1276.

(77) Grofman, Bernard. 1993. Toward an institution rich theory of political competition, with a supply-side component. In Bernard Grofman (Ed.), Information, Participation, and Choice: An Economic Theory of Democracy' in Perspective. Ann Arbor, Michigan: University of Michigan Press, 179-193.

PROFESSIONAL ARTICLES (in print) (cont.)

(78) Grofman, Bernard. 1993. The use of ecological regression to estimate racial bloc voting. University of San Francisco Law Review, 27(3): 593-625.

(79) Grofman, Bernard. 1993. Public choice, civic republicanism, and American politics: Perspectives of a `reasonable choice' modeler. Texas Law Review, 71(7):1541-1587. **(**A portion of this [pp. 1541, 1553-66] is reprinted in Tushnet, Mark and Lisa Heinzerling, The Regulatory and Administrative State. Oxford University Press, 2006.)

(80) Brischetto, Robert, David R. Richards, Chandler Davidson, and Bernard Grofman. 1994. Texas. In Davidson, Chandler and Bernard Grofman (Eds.), Quiet Revolution in the South: The Impact of the Voting Rights Act, 1965-1990. Princeton, NJ: Princeton University Press, 233-257.

(81) Grofman, Bernard and Chandler Davidson. 1994. The effect of municipal election structure on black representation in eight Southern states. In Davidson, Chandler and Bernard Grofman (Eds.), Quiet Revolution in the South: The Impact of the Voting Rights Act, 1965-1990. Princeton, NJ: Princeton University Press, 301-334.

(82) Handley, Lisa and Bernard Grofman. 1994. The Impact of the Voting Rights Act on Minority Representation: Black Officeholding in Southern State Legislatures and Congressional Delegations. In Davidson, Chandler and Bernard Grofman (Eds.), Quiet Revolution in the South: The Impact of the Voting Rights Act, 1965-1990. Princeton, NJ: Princeton University Press, 335-350.

(83) Glazer, Amihai, Robert Griffin, Bernard Grofman and Martin Wattenberg. 1995. Strategic vote delay in the U.S. House of Representatives. Legislative Studies Quarterly, 20(1):37-45.

(84) Skaperdas, Stergios and Bernard Grofman. 1995. Modeling negative campaigning. American Political Science Review, 89(1):49-61.

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(86) Grofman, Bernard and Peter van Roozendaal. 1995. Toward a theoretical explanation of premature cabinet termination: With application to post-war cabinets in the Netherlands. European Journal of Political Research, 26:155-170.

(87) Landa, Janet, Michael Copeland and Bernard Grofman. 1995. Ethnic voting patterns: a case study of metropolitan Toronto. Political Geography, 14(5):435-449.

PROFESSIONAL ARTICLES (in print) (cont.)

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(89) Grofman, Bernard. 1996. Extending a dynamic model of protocoalition formation. In Norman Schofield (Ed.), Collective Decision Making: Social Choice and Political Economy. Boston: Kluwer-Nijhoff, 265-280.

(90) Grofman, Bernard, Phillip Straffin and Nicholas Noviello. 1996. The sequential dynamics of cabinet formation, stochastic error, and a test of competing models. In Norman Schofield (Ed.) Collective Decision Making: Choice and Political Economy. Boston: Kluwer-Nijhoff, 281-293.

(91) Grofman, Bernard. 1996. Political Economy: Downsian Perspectives. In Robert Goodin and Hans-Dieter Klingemann (Eds.) New Handbook of Political Science. New York and London: Oxford University Press, 691-701.

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(96) Merrill III, Samuel and Bernard Grofman. 1997. Modeling large electorates with Fourier series: With applications to Nash equilibria in proximity and directional models of spatial competition. Social Choice and Welfare. 14(4):545-562.

(97) Falmagne, Jean-Claude, Michel Regenwetter and Bernard Grofman. 1997. A stochastic model for the evolution of preferences. In Anthony J. Marley (ed.) Decision and Measurement: Essays in Honor of R. Duncan Luce. New Jersey: Lawrence Erlbaum, 111-129.

(98) Owen, Guillermo and Bernard Grofman. 1997. Estimating the likelihood of fallacious ecological inference: Linear ecological regression in the presence of context effects. Political Geography. 16(8):657-690.

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(100) Grofman, Bernard, William Koetzle, Thomas Brunell. 1997. An integrated perspective on the three potential sources of partisan bias: Malapportionment, turnout differences, and the geographic distribution of party vote shares. Electoral Studies, 16(4):457-470

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(102) Regenwetter, Michel and Bernard Grofman. 1998. Approval voting, Borda winners and Condorcet winners: Evidence from seven elections. Management Science, 44(4):520-533.

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(109) Brians, Craig L. and Bernard Grofman. 1999. When registration barriers fall, who votes? An empirical test of a rational choice model. Public Choice, 99:161-176.

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PHOTO-OFFSET CONFERENCE PROCEEDINGS

(T1) Mathematics and politics: Mathematical reasoning and optimal jury decision processes. Plus, Reply. In Max Black (Ed.), *Problems of Choice and Decision: Proceedings of a Colloquium Held in Aspen, Colorado, June 24-July 6, l974*. Cornell University Program on Science, Technology, and Society and Aspen Institute for Humanistic Studies: Photo-offset, l975, 33l-337; 544-547.

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(T3) Grofman, Bernard, Scott L. Feld and Guillermo Owen. Synopsis: A Bayesian approach to optimal decision making. In J. L. Elohim (Ed.), *Proceedings of the Fifth International Congress of Systems and Cybernetics, Mexico City, August 13-17, 1981*, photo-offset, 1981.

PREPARED TESTIMONY

(T4) Comment on H.R. 2349, a bill on standards for congressional redistricting. Prepared for the staff of the Wednesday Study Group, U.S. House of Representatives, April 1981.

(T5) Report on the constitutionality of Hawaii Reapportionment Commission's proposed state legislative redistricting. Prepared testimony in *Travis v. King*, U.S. District Court for the State of Hawaii, March 23-24, 1982, photo-offset.

(T6) Report to the Special Master on methodology used to insure compliance with standards of the Voting Rights Act of 1965, *Flateau v. Anderson*. U.S. District Court, Southern District of New York, June 7, 1982, photo-offset.

(T7) The disadvantageous effects of at-large elections on the success of minority candidates for the Charlotte and Raleigh City Councils. Prepared testimony in *Gingles v. Edmisten*. U.S. District Court for the State of North Carolina, August 1983, photo-offset.

(T8) Effects of multimember districts in state legislative elections in eight North Carolina counties, 1978-1982. Prepared testimony in *Gingles v. Edmisten*, U.S. District Court for the State of North Carolina, August 1983, photo-offset. (Also see R22.)

(T9) Report on prima facie evidence of political gerrymandering in the 1983 California Congressional redistricting plan, plus Rejoinder. Prepared testimony in *Badham v. Eu*, U.S. District Court for the State of California, December 1983, photo-offset.

(T10) Report on the effects of the proposed redistricting plan for the South Carolina Senate. Prepared testimony in *South Carolina v. U.S.*, U. S. District Court for the District of Columbia, photo-offset, July 1984.

PREPARED TESTIMONY (cont.)

(T11) Affidavits in *Haskins v. Wilson County*, U.S. District Court for the State of North Carolina, photo-offset, 1985-86.

(T12) Affidavit in *Jackson v. Nash County*, U.S. District Court for the State of North Carolina, April 1986.

(T13) Affidavits in *U.S. v. City Council of Los Angeles*, U.S. District Court for the State of California, July 1986.

(T14) Declarations in *Gomez v. City of Watsonville*, U.S. District Court for the State of California, August and October 1986.

(T15) Declarations in *McGhee et al. v. Granville County of North Carolina*, U.S. District Court for the State of North Carolina, 1987.

(T16) Declarations in *Badillo et al. v. City of Stockton*, U.S. District Court for the State of California, December 1987 and February 1988.

(T17) Affidavits in *Republican National Committee of North Carolina v. James G. Martin*, U.S. District Court for the State of North Carolina, July, August 1988.

(T18) Report in *Chisom v. Roemer*, Civil Action No. 86-4075 in the Eastern District of Louisiana, October 1988, revised March 1989.

(T19) Affidavits regarding minority representation in the 1988 Republican National Convention, August 5, 1988, and August 8, 1988.

(T20) Report in *Garza v. Los Angeles County Board of Supervisors*. U.S. District Court for the State of California, April 1989; Declaration, October 26, 1989.

(T21) Report for the Alaska Districting Commission on racially polarized voting in elections to the Alaska legislature, May 1991.

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(T24) Declaration in *Prosser v. State of Wisconsin Board of Elections*, U.S. District Court for the State of Wisconsin, April 1992.

(T25) Reports for State of Alaska on the 1992 legislative districts, November 1993, January 1994.

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(T27) Expert witness declaration in *Bush. v Vera*, U.S. District Court, Texas, July 18, 1996.

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(T30) Expert witness reports in *Arrington et al. v. Elections Bd.* 173 F. Supp. 2d 856 U.S. District Court, Eastern Division, Wisconsin, January, February and March, 2002.

(T31) Expert witness affidavit in *Rodriguez et al. v. Pataki, et al.*, Case No. 02 Civ. 618, 01 Civ. 3843, U.S. District Court, Southern District of New York, May 11, 2002.

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(T39B) Grofman, Supplement I to the Report of the Special Master in *Personhuballah v.* Alcorn. U.S. District Court for the Eastern District of Virginia, December 9, 2015 (Civ No. 3:13:cv678).

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(S19) Bernard Grofman and German Feierherd. The U.S. could be free of gerrymandering. Here's how other countries do redistricting *Monkey Cage*, *Washington Post*, August 7, 2017 (on-line) https://www.washingtonpost.com/news/monkey-cage/wp/2017/08/07/the-supreme-court-will-soon-consider-gerrymandering-heres-how-changes-in-redistricting-could-reduce-it/?utm_term=.bf54690edf73

(S20) Grofman, Bernard and Jonathan Cervas. Pennsylvania has to draw new congressional districts, but getting rid of gerrymandering will be harder than you think. *Monkey Cage*, *Washington Post*, February 9, 2018 (on-line) https://www.washingtonpost.com/news/monkey-cage/wp/2018/02/09/now-pennsylvania-has-to-draw-new-house-districts-but-getting-rid-of-gerrymandering-is-harder-than-you-think/?utm_term=.2b64e8d8d1ad

(S21) Grofman, Bernard. This Might be the Way to Prove Partisan Gerrymandering according to the New Supreme Court Standard.
Monkey Cage, *Washington Post*, July 9, 2018 (on-line)
https://www.washingtonpost.com/news/monkey-cage/wp/2018/07/09/this-might-be-the-way-to-prove-partisan-gerrymandering-according-to-the-new-supreme-court-standard/?utm_term=.4a1d509a5732

(S22) Grofman, Bernard. What Joe Biden can learn from Harry Truman -WP Monkey Cage October 1, 2021. https://www.washingtonpost.com/politics/2021/10/01/democrats-skirmish-over-their-omnibus-bill-heres-what-they-can-learn-harry-truman/

OTHER PUBLICATIONS

(Ol) Chicago. In David Glazier (Ed.), Student Travel in America. New York: Pyramid Publication, l968. (Under pseudonym.)

(O2) Chicago: Hyde Park and the University of Chicago, the Loop and Near-North. In Where the Fun is: East of the Mississippi. NY: Simon and Schuster, l969. (Under pseudonym.)

SOCIAL SCIENCES WORKING PAPERS AND RESEARCH REPORTS

(WP1) Note: Confessions of a mad modeler, Research Report R6, School of Social Sciences, University of California, June 1978.

(WP2) Note: The paradox of voting in a faculty appointment decision (with Steven Brown). Research Report R6, School of Social Sciences, University of California, Irvine, June 1978.

WEBSITE POSTINGS

(W4) Communication: Omitted Candidate Bias. Annals of In-Comparable Studies (on-line journal), April 1, 2016. http://www.incomparablestudies.com

(W5) Communication: A Brief Comment on the U.S. Supreme Court Decision in Evenwel v. Abbott . April 4, 2016. https://casetext.com/posts/a-brief-comment-on-evenwel-v-abbott

(W6) Communication: Two Modest Proposals for the Wall with Mexico. Annals of In-Comparable Studies (annual on-line satirical journal), April 1, 2017. http://www.incomparablestudies.com

(W7) Communication: Great White Whale Milk Company. Annals of In-Comparable Studies (annual on-line satirical journal), April 1, 2018. http://www.incomparablestudies.com

(W8) Communication: Good Fences Make Good Neighbors (with Fritz Tailor). Annals of In-Comparable Studies (annual on-line satirical journal), April 1, 2019. http://www.incomparablestudies.com

(W9) Communication: How Likely is Trump to Lose the Popular Vote but Win the Electoral College? August 2020 3streamsblog@gmail.com

(W10) Communication: Does Donald Trump Really Believe He Won the 2020 Election? *Election Law Blog*, November 27, 2020. https://electionlawblog.org/?p=119100

WEBSITE POSTINGS (cont.)

(W11) Communication: Traffic Fatalities as an Objective Indicator of Level of Democracy. Annals of In-Comparable Studies (annual on-line satirical journal). April 1, 2021. http://www.incomparablestudies.com

(W12) Communication: 2006 Poem on the Renewal of the Voting Rights Act. (political satire) Election Law Blog, November 27, 2020. Guest Post/Poem from A Wuffle (footnotes by Bernie Grofman): Countdown to (VRA) Renewal | Election Law Blog

(W13) Communication: Bernard Grofman and Jonathan Cervas. 2022 forthcoming. "The 2024 WWE Grudge Match of the Century" (political satire). IPS, TBA

(W14) Bernie Grofman. Communication:_ "Can Partisan Fairness Be Melded with Good Government Criteria"_ John Nagle's Intriguing Solution" *Election Law Blog*, August 14, 2021. https://electionlawblog.org/?p=124078

(W15) Bernie Grofman. Communication: "How Best to do Prisoner Data Reallocation, i.e., How Best to Mitigate Prison Gerrymandering?" *Election Law Blog*_ August 16, 2021. https://electionlawblog.org/?p=124127

(W16) Bernie Grofman. Communication: "Cognizability as the Neglected Fourth C of Good Government Redistricting Criteria" *Election Law Blog*, August 23, 2021. https://electionlawblog.org/?p=124127 https://electionlawblog.org/?p=124223 https://electionlawblog.org/wp-content/uploads/GROFMAN-Cognizability.docx

(W17) Jonathan Cervas and Bernie Grofman . Communication: "Fracking: A Contiguity Related Redistricting Criterion" Election Law Blog, August 31, 2021. https://electionlawblog.org/?p=124127 https://electionlawblog.org/?p=124386

(W18) Bernard Grofman, Lisa Handley , and David Lublin. "Can Social Science Evidence Be Trusted in Voting Rights Litigation." (abstract plus SSRN link to full paper posted). *Election Law Blog*, September 9, 2021. https://electionlawblog.org/?p=124127

(W19) Bernard Grofman and Jonathan Cervas. Communication: "New Approaches to Compactness" *Election Law Blog*, September 13, 2021. https://electionlawblog.org/?p=124127 https://electionlawblog.org/?p=124386

(W20) Bernard Grofman and Haotian Chen. 2022 forthcoming. "Bellwether Counties are Mostly a Matter of Chance and are now Poor Predictors of Presidential Election Results." *London School of Economics Political Science Blog*.

(W21) Bernard Grofman 2022. "Stupid Politics 101." *London School of Economics Political Science Blog*

CURRENT RESEARCH

My two main (but very much overlapping) research areas could be characterized as (1) comparative politics in which the U.S. is considered but one case among many, with a focus on representation, e.g., electoral rules and constitutional design; redistricting and voting rights; voter choice and political party competition, and the structure of governing coalitions, and (2) behavioral social choice, linking mathematical models of group and individual decision making and information processing to empirical evidence. And I have interests in political persuasion and political propaganda, including political cartooning and satire; as well as a strong interest in citizen statistical literacy to help ordinary voters make sense of the increasing use of numbers and graphs in the media and in political communications and to help them understand statistical fallacies. Since the range of my interests spans most political science subfields, I now tend to describe myself as a methodologist, though I also see myself as a student of empirical democratic theory. Moreover, my interests are interdisciplinary, e.g.., involving work at the intersection of political science and economics, and political science and law.

CONFERENCE RELATED FUNDING

2018 CSD Conference on Money and Politics, Part II (co-organized with Desmond King, with $5,000 funding from the Peltason Center for the Study of Democracy and supplemental funding from the Peltason Chair of Democracy Studies) Newport Beach, March 3-4.

2017 Conference on Money and Politics, Part I (co-organized with Desmond King, with approximately $8,000 funding from Nuffield College, Oxford University, and supplemental funding from the Peltason Chair, and with $1,000 additional funding from the Peltason Center for the Study of Democracy; held at Oxford University, September 15-16.

2016 CSD Conference on Duverger's Law in Historical Perspective (Peltason Chair, with $1,000 supplemental funding from the Peltason Center for the Study of Democracy; co-organized with Annie Laurent, University of Lille, II and Bernard Dolez, University of Paris, I; held in Frejus, France, May 26-28).

2016 CSD Conference on New Developments in the Study of Cabinet Coalition Formation Processes. (Peltason Chair, with $1,000 supplemental funding From the Peltason Center for the Study of Democracy, and supplemental support from the Belgian Academy of Sciences in the form of conference facilities April 28-30 at their Rome Center in the Borghese Gardens; co-organized with Patrick Dumont, University of Luxembourg).

2016 CSD Conference on New Developments in the Study of Political Persuasion (Peltason Chair, with $10,000 supplemental funding from the Peltason Center for the Study of Democracy; held in Laguna Beach, January 8-10).

2011-12 Collaborative Workshop on Ethnic Politics and Electoral Democracy (held in Zurich in June, 2012, with principal support from NCCR Democracy, University of Zurich, $30,000, and supplemental funding from the Peltason Chair And the UCI Center for the Study of Democracy; with Daniel Bochsler, ETH Zurich)

2008 CSD Conference on Long Term Consequences of Electoral Rules Change: Comparing Italy and Japan. Bologna Italy, November 28-29, 2008. (Peltason Chair, with supplemental funding of $7,500 from the UCI Center for the Study of Democracy).

2006 CSD Conference on Plurality and Runoff Methods in Canada, the United States and the United Kingdom (Canadian Embassy, $5,000, UCI Center for the Study of Democracy, $5,000; with Shaun Bowler), February 17-20.

2005 IMBS Conference on Spatial Social Choice, December 9-11 (UCI Institute for Mathematical Behavioral Sciences and the UCI Center for the Study of Democracy; with Donald Saari.)

CONFERENCE RELATED FUNDING (cont.)

2004 CSD Conference on Pluralitarian/Majoritarian Electoral Systems (Borchard Foundation, $25,000, with $2,500 supplemental funding from the UCI Center for the Study of Democracy, held in Missilac, France, June; with James Adams and Shaun Bowler).

2000-01 CSD Conference on Comparative Redistricting (NSF Program in Political Science, $22,000, with $5,000 supplemental funding from CSD, the UCI Office of the Vice Chancellor for Research, and the School of Social Sciences; with Lisa Handley).

1998 CSD Conference on Mixed Electoral Systems that Emulate the German Model (UC Center for the German and European Studies, $10,000, and $5,000 supplemental funding from the UCI Center for the Study of Democracy, with Matthew Shugart and Martin Wattenberg)

1997 CSD Conference on Electoral and Party Systems in Scandinavia: Origins and Evolution (UCI Center for the Study of Democracy, $11,000, with Arend Lijphart).

1996 CSD Conference on Elections in Australia, Ireland and Malta under the Single Transferable Vote (UCI Center for the Study of Democracy, $11,000, with Shaun Bowler).

1994-95 Conference on the Civil Rights Act of 1964 in Thirty Year Perspective. (Joyce Foundation #446740-49317, $18,500, with additional funding by the Federal Judicial Center).

1991-92 CSD Conference on Japanese, Korean and U.S. Election Practices in Comparative Perspective (UC Pacific Rim Research Program, $14,700,with additional funding from the UCI Center for the Study of Democracy; with Sung Chull Lee, Rein Taagepera and Brian Woodall).

1991-92 Workshops on Politics and the Democratization Process, (National Science Foundation, Political Science Program SES# 91-13984 ($42,000, with Russell Dalton and Harry Eckstein).

1989-90 A Conference on the Voting Rights Act: A Twenty-five Year Perspective (Rockefeller Foundation, $50,000, with Thomas Mann and Chandler Davidson, under the auspices of The Brookings Institution).

1988 A Conference on 'The Calculus of Consent': A Twenty-five Year Perspective (Liberty Fund; with Donald Wittman)

1982 A Conference on Information Pooling. National Science Foundation, Political Science Program (NSF #SES 82-09109, $26,300, with Guillermo Owen and Scott L. Feld).

CONFERENCE RELATED FUNDING (cont.)

1980 A Conference on Representation and Apportionment Issues in the 1980s. National Science Foundation, Political Science Program (NSF #SES 79-26813, $20,200, with Arend Lijphart, Robert McKay, and Howard Scarrow; additional $8,000 funding provided by the American Bar Association)

1979 A Conference on Voter Turnout. National Science Foundation, Political Science Program (NSF SOC 78-19433, $14,400, with Richard Brody and Herbert Weisberg)

CONFERENCE PAPERS 1999-2024 (unpublished)

(C59) Commisso, Ellen and Bernard Grofman. Liberty, equality, fraternity: Tripolarity, cycles and the dynamics of party competition in post-socialist Eastern Europe. Presented at the 1999 Annual Meeting of the American Political Science Association, Atlanta, Georgia.

(C67) Gray, Mark and Bernard Grofman. "Several (likely to be contentious) claims about the nature and prerequisites of democracy." Prepared for delivery at the Second London School of Economics Workshop on "Freedom and Democracy," London, June 15, 2001.

(C72) Grofman, Bernard and Samuel Merrill. "What does it mean to offer a "solution" to the problem of ecological inference?" Paper presented at the Conference on New Advances in Ecological Inference, June 17-18, 2002, Cambridge MA.

(C82) Grofman, Bernard. "Statistics and Social Choice: Connections Between Sports and Politics." Paper presented at the University of California, Irvine Institute for Mathematical Sciences Conference on Decisions, Sports, and Statistics" December 4, 2004.

(C88) Wayman, Frank, Bernard Grofman and Matt Barreto. "Party ID in the US in Longitudinal Perspective." Presented at the European Consortium for Political Research Conference, Nicosia Cyprus, April 27, 2006.

(C94) Gray, Mark, Paul Perl and Bernard Grofman. "More Than an Ocean Apart: The Americas and the College of Cardinals 1903-2005." Prepared for delivery at the Society for the Scientific Study of Religion conference, Portland, Oregon. October 19-22, 2006.

(C96) Grofman, Bernard, James Fowler, Natalie Masuoka and Scott Feld. "Social Choice Approaches to Social Exchange Networks." Presented at a Colloquium of the Netherlands Group in Social Choice, Tilburg University, April 5, 2007. Also presented as a colloquium at the University of Paris, I, June 5, 2007.

(C98) Schneider, Carsten Q. and Bernard Grofman. "Visual Presentation of Fuzzy QCA Data." Paper presented at panel on "Political Methodology," European Consortium for Political Research, Pisa, Italy, September 6-8, 2007. An earlier version of this paper was presented at the International Conference on Comparative Social Sciences, Sophia University, Tokyo, Japan, July 15-16, 2006, under the title "It Might Look Like a Regression Equation…but It Is Not! An Intuitive Approach to the Presentation of QCA and fs/QCA Results."

(C104) Grofman, Bernard. "Voting as Habit." Presented at the Annual Meeting of the Public Choice Society, Monterey, California, March, 2010.

CONFERENCE PAPERS (unpublished) (cont.)

(C105) Feld, Scott L. and Bernard Grofman. "Creating and Maintaining a Scale-Free Core-Periphery Fractal Network" Annual Meeting of the International Society for Social Networks. Riva del Garda, Italy, June 30-July 4, 2010.

(C107) Grofman, Bernard. "Voting Rights and Minority Representation in the United States and England in Comparative Perspective." Presented at a Conference on the Impact of Electoral Institutions and Political Parties, University of Manchester, Manchester England, September 20, 2010.

(C114) Garcia, Jennifer, Sierra Powell, and Bernard Grofman. "Making It Easier or Harder for Ex-Felons to Vote: Political and Rhetorical Perspectives." Presented at the Annual Meeting of the Western Political Science Association, Los Angeles, March, 2013.

(C116) Grofman, Bernard, Yogesh Uppal and Malte Pehl. "Duverger's Law in India." Prepared for delivery at the Annual Meeting of the Public Choice Society, Charleston, S.C., March 7-9, 2014.

(C117) Grofman, Bernard and Joseph Godfrey "Aspiration Models of Committee Voting." Prepared for delivery at the conference on "Public Choice and Social Choice," Condorcet Center, University of Rennes, May 22-23, 2014.

(C118) Grofman, Bernard and Stanley Winer. "Comparing Economic and Political Competition." Prepared for delivery at the Conference on the Free Market, University of Tampere, Tampere, Finland, June 9-15, 2014.

(C119) Grofman, Bernard. "Reflections on Electoral Competition." Presented at the International Conference on Electoral Competition, Laguna Beach, California, December 14-15, 2014.

(C121) Tan, Netina and Bernard Grofman. "Multiseat Plurality Bloc Voting in Electoral Authoritarian Regimes: Comparing Singapore, Cameroon, Djibouti, and Chad." Prepared for delivery at the Annual Meeting of the Asian Studies Association, Singapore, July 17-19, 2014; also presented, under the title "Electoral Rules that Dictators Love," at the Conference on Comparative Elections, Belgian Academy of Sciences, Rome, September 16-18, 2015; also presented, under the title "Electoral Engineering and Electoral Manipulation," at the 7th Annual Conference on Mathematics and the Social Sciences, University of Auckland, New Zealand, February 18, 2016.

(C122) Lublin, David, Thomas Brunell, Bernard Grofman and Lisa Handley. "The Election of African-Americans and Latinos to State Legislatures and the U.S. Congress in 2015." Presented at the Workshop on the Representation of Women and Minorities, McGill University and Université de Montréal, August 23-24, 2015.

CONFERENCE PAPERS (unpublished) (cont.)

(C124) Bernard Grofman. "Duverger's Law and Beyond." Paper presented at the Conference on the 65th Anniversary of Duverger's Law." Frejus, France, May 26-27, 2016.

(C128) Grofman, Bernard. "Steering between Scylla and Charybdis: *Thornburg v. Gingles* and *Shaw v. Reno.*" Presented at the Conference on Legislatures, Courts and Voting Rights: Developments since the 2013 *Shelby County v. Holder* Decision. University of Pittsburgh Law School, April 10, 2017.

(C129) Grofman, Bernard. "Electoral Rules and Ethnic and Gender Representation in Global Perspective." Prepared for delivery at the Conference on Democracy and Inclusion, University of Zurich, June 14-16, 2017.

(C131) Grofman, Bernard and Scott L. Feld. "Graph Theory Perspectives on Collective Representation and the Potential for Computational Social Choice." Prepared for delivery at the Conference on Voting Rules to Select Multiple Winners, Schloss Dagstuhl, Germany, June 25-29, 2017.

(C132) Saari, Donald and Bernard Grofman. "A Problem for Computational Social Choice: Reconciling Quota and House Monotonicity in Proportional Methods for Apportionment." Prepared for delivery at the Conference on Voting Rules to Select Multiple Winners, Schloss Dagstuhl, Germany, June 25-29, 2017.

(C133). Grofman, Bernard. "Laws of Redistricting." Presented at the National Conference of State Legislatures Legislative Forum, Panel on Redistricting and Elections, Coronado, California, December 10-13, 2017.

(C134) Grofman, Bernard. "Democratic Systems and Political Representation: Nature and Effects of Electoral Rules." Keynote Address at the Conference on Mathematics and Politics: Democratic Decision Making. Royal Palace of Herrenhausen, Hannover, Germany. May 28-30, 2018. A revised version prepared as an invited special session address at the 20th Annual International Academic Conference on Economic and Social Development, Moscow, April 8-12, 2019.

(C135) Grofman, Bernard. "A Public Choice Perspective on Redistricting." Prepared for the Academy Forums Workshop, University of California, Irvine, February 27, 2019;a revised version presented as a Plenary Address at the Annual Conference of the Public Choice Society, Louisville, Kentucky. March 14-16, 2019.

(C137) Grofman, Bernard. "Paradoxes of Representation in Spatial Voting Models." Prepared for delivery at the Conference on "Spatial Models of Party Competition: Recent Developments." Mannheim, Germany, Mannheim Center for European Social Research (MZES), University of Mannheim, July 26-27, 2019.

RECENT CONFERENCE PAPERS (unpublished) (cont .)

(C139) Grofman, Bernard. A Public Choice Perspective on the Voting Rights Act.. Prepared for delivery at the Annual Meeting of the Public Choice Society, Newport Beach, California, March 12-14, 2020 (conference cancelled).

(C140) Grofman, Bernard. Can Social Science Evidence in Voting Rights Litigation be Trusted? . Prepared for delivery at the Annual Meeting of the Public Choice Society, Nashville, Tennessee March 10-12, 2022.

(C141) Grofman, Bernard. Institutional Failures in Redistricting. Prepared for delivery at the Annual Meeting of the Public Choice Society, Nashville, Tennessee March 10-12, 2022.

(C142) Grofman, Bernard. and Mark Wilson. Uniform Swing versus Proportional Swing: Predicting What Happens Between Elections. Prepared for Presentation at the Public Choice Society, Seattle, Washington, March 16-18, 2023.

OTHER CONFERENCE PARTICIPATION 2008-2024

Chair, Panel on "Formal and Empirical Models of Voting and Elections." Annual Meeting of the Public Choice Society, San Antonio, March 7-8. 2008.

Invited roundtable participant, The Voting Rights Act and the Deconstruction of the Republic." Annual Meeting of the American Political Science Association, Boston, August 27-31, 2008.

Chair, Panel on Re-Examining Strategic Voting. Annual Meeting of the American Political Science Association, Boston, August 27-31, 2008.

Discussant, Annual Meeting of the American Political Science Association. Panel on "Electoral Engineering and Political Representation in Ethnically Divided Societies" Washington, D.C., August, 2008.

Discussant, Annual Meeting of the Public Choice Society, Las Vegas, March 10-12. 2009.

Discussant, Annual Meeting of the Public Choice Society, Monterey, California, March 12-14, 2010.

Invited discussant, Conference on "The World Values Survey," Center for the Study of Democracy, UCI, March 11, 2011.

Co-organizer (with Michael Alvarez), Conference on "Election Administration in the U.S.: Ten Years After *Bush v. Gore*." Laguna Beach, CA, April 16-17, 2011.

Co-organizer (with Mark Franklin and Alex Trechsel), Conference on "Internet, Voting and Democracy in Global Perspective." Laguna Beach, CA, May 14-15, 2011.

Invited discussant, "Franco-Italian Workshop on "Two Bloc Politics in France and Italy." Department of Political Science, University of Bologna, September 16-17, 2011.

Invited discussant, Conference on New Perspectives on Public Debt, European Center for the Study of Public Choice. Sapienza University of Rome, September 26-28, 2011. Panel on "Legislative Voting on Budgetary Issues."

Invited discussant, Conference on "Revisiting Party Identification: American and European Perspectives." CISE (Center for Italian Electoral Studies), Department of Government, LUISS University, Rome, October 4-5, 2011.

Invited discussant, Final Overview Panel, Conference on "Constitutional Design and Conflict Management in Africa," Climate Change and African Political Stability Program, Robert S. Strauss Center for International Security and Law, University of Texas, Austin, November 14-15, 2011

OTHER CONFERENCE PARTICIPATION (cont.)

Discussant, Panel on "Bio-Economics," World Congress of the Public Choice Societies, Miami, March 8-12, 2012.

Co-organizer (with Andre Blais, Nina Wiesehomeier, Ignacio Lago and Pedro Magalhaes), Conference on "Effects of District Magnitude." University of Lisbon. Lisbon, Portugal, May 28-30, 2012.

Co-organizer (with Daniel Bochsler), Conference on "Ethnic Parties and Ethnic Conflict." University of Zurich, Zurich, Switzerland, June 14-16, 2012.

Co-organizer (with Bernhard Wessels), Conference on "New Developments in Spatial Modeling of Political Party Competition." Wissenschaft Zentrum, Berlin, Germany, July 14-15, 2012.

Invited discussant at a theme panel discussing the draft report of Bingham Powell's Presidential Task Force on Electoral Rules and Democratic Governance, cancelled Annual Meeting of the American Political Science Association, New Orleans, August 28-September 2, 2012.

Co-organizer (with Samuel Issacharoff, Richard Pildes, and Daniel Bochsler), Conference on "Constitutional Design and Ethnic Conflict." New York University Law School, November 17, 2012.

Panel Chair, "Social Choice Theory." Annual Meeting of the Public Choice Society, New Orleans, March 6-9, 2013.

Invited discussant. International Conference on "Gender Quotas." McMaster University, Hamilton, Canada, October 3-5, 2013.

Participant, "Roundtable on Andranik Tangian's *Mathematical Theory of Democracy*." Annual Meeting of the Public Choice Society, Charleston, South Carolina, March 6-9, 2014.

Invited discussant, Conference on "Electoral Reform in the United States." Center on Democracy, Development, and the Rule of Law (CDDRL), Stanford University, March 14-15, 2014.

Invited discussant, Conference on "Public Choice and Democracy." Department of Economics, University of Rennes, France, May 23, 2014.

Rapporteur and Discussant, UCI Institute for Mathematical and Behavioral Sciences ORU Conference on "Validation. What Is It?" February 13-14, 2015.

Introductory Remarks, UCI Institute for Mathematical and Behavioral Sciences ORU Conference on "Behavioral Social Choice: Bernie Grofman 70th Birthday Tribute." March 6-7, 2015.

OTHER CONFERENCE PARTICIPATION (cont.)

Participant Roundtable on McLean and Urken (eds.) *Classics of Social Choice*." Annual Meeting of the Public Choice Society, San Antonio, Texas, March 12-15, 2015.

Chair, "Roundtable on the Voting Rights Act." Annual Meeting of the American Political Science Association, San Francisco, September 3-6, 2015.

Chair, "Roundtable on Party Nomination Processes." Annual Meeting of the American Political Science Association, San Francisco, September 3-6, 2015.

Organizer, Center for the Study of Democracy Conference on "New Developments in Political Persuasion." Laguna Beach California, April 9-10, 2016

Co-organizer (with Patrick Dumont), and discussant, Conference on "New Developments in Coalition Theory." Belgian Academy in Rome, April 28-30, 2016.

Co-organizer (with Annie Laurent and Bernard Dolez), and discussant, Conference on "Duverger's Law in Sixty Five Year Perspective." Frejus, France, May 26-27, 2016.

Invited discussant, Conference on Democracy and Inclusion, University of Zurich, June 14-16, 2017.

Co-organizer (with Susumu Shikano), and discussant, Conference on "New Developments in Spatial Models of Party Competition, II." Konstanz, Germany, July 15-16, 2017.

Plenary speaker, European Consortium for Political Research, "Graduate Workshop on Models and Methods." Budapest, Hungary, August 6, 2017.

Co-organizer (with Desmond King), and discussant, Conference on "Money and Politics." Oxford, UK, Nuffield College, September 15-16, 2017.

Chair and discussant, Annual Meeting of the Midwest Political Science Association, panel on "Redistricting" Chicago, March 5-7, 2018.

Chair, Panel on Donald Trump and the Past (and Future) of the Republican Party. Annual Meeting of the Public Choice Society, Newport Beach, California, March 10-12, 2020 (conference cancelled).

Presenter, Redistricting Data Hub Redistricting and Data Convening Conference, Stanford University, Palo Alto California, September 17, 2022.

Chair and Discussant, Panel on Modeling Social Choice Rules and Their Effects Public Choice Society, Seattle, Washington, March 16-18, 2023.

INVITED COLLOQUIA 2023-

April 5 , 2023	Colloquium, “Redistricting in Comparative Perspective” Luiss University Rome, Italy
April 25 , 2023	Colloquium, “Redistricting in Comparative Perspective” European University Institute , Florence (Fiesole), Italy

INVITED COLLOQUIA (2006-2022)

May 29, 2019 — Colloquium, "Aspiration Models to Explain Experimental Spatial Voting Game Outcomes." Department of Economics University of Bayreuth, Germany.

May 16, 2019 — Colloquium, "Explaining the Success of Ethnic Political Parties." Department of Political Science, University of Siena, Italy.

April 13, 2019 — Colloquium, "Explaining the Success of Ethnic Political Parties." Department of Economics Nizhny Novgorod School of Higher Economics, Nizhny Novgorod, Russia.

June 20, 2018 — Colloquium, "A Reasonable Choice Approach to Turnout." V-DEM Institute, University of Gothenburg.

March 22, 2018 — Colloquium, "A Reasonable Choice Approach to Turnout." Department of Economics, University of Malaga

March 27-31, 2017 — Seminar Presentations "Formal Models of Politics." Juan March Institute, Carlos III University, Madrid.

May 19, 2016 — Colloquium "Aspiration Models of Committee Voting," Department of Economics, St. Etienne University, France.

April 18-22, 2016 — Seminar Presentations "Spatial Models of Politics." Department of Political Science, Central European University, Budapest.

June 14-26, 2015 — Seminar Presentations, "Empirical Public Choice." Program in Decision Sciences, University of Konstanz.

May 11, 2015 — Colloquium, "Experimental Committee Games." Center for Mathematics and Philosophy, University of Munich, Germany.

April 23, 2015 — Colloquium, "Electoral Rules that Dictators Love." Department of Economics, University of Linz, Austria.

April 20-24 2015 — Seminar Presentations, "Spatial Models of Voting." Department of Political Science, Institute for Advanced Studies, Vienna, Austria.

April 23, 2015 — Colloquium, "Electoral Rules that Dictators Love." Department of Political Science, Institute for Advanced Studies, Vienna.

INVITED COLLOQUIA (cont.)

May 12-20, 2014 Seminar Presentations, "Behavioral Social Choice." Department of Economics, University of Caen, France.

April 29, 2014 Colloquium, "Evaluating the Effects of Electoral Rules on Party Competition." Juan March Institute, Juan Carlos III University, Madrid.

April 7, 2014 Colloquium, "Electoral Engineering." Department of Economics, University of Malaga, Spain.

April 10, 2013 Seminar Presentation, "The Nature and Impact of Public Comment on Congressional Redistricting in 2011-12." Straus Institute for Advanced Study in the Law, New York University Law School.

March 5, 2013 Seminar Presentation, "Voting Rights," Brennan Center for Social Justice, New York University Law School.

October 17, 2012 Bernard Grofman and Jennifer Garcia. Using Spanish Surname to Estimate Hispanic Voting Population in Voting Rights Litigation: A Bayesian Model of Context Effects. Seminar on Law, Economics and Politics, New York University Law School.

October 10, 2012 Colloquium, "Electoral Engineering." Departments of Economics and Political Science, Carleton University, Ottawa, Canada.

July 4, 2012 Colloquium, "Is Turnout the Paradox that Killed Rational Choice.Theory?" Center for the Study of Democracy. Leuphana University, Lűneburg, Germany.

July 3, 2012 Annual Hans-Dieter Klingemann Invited Lecture, "Electoral Engineering." Center for the Study of Democracy, Leuphana University, Lűneburg , Germany.

June 18, 2012 Colloquium, "Is Turnout the Paradox that Killed Rational Choice Theory?" Department of Political Science, University of Zurich, Switzerland.

June 28, 2011 Colloquium. "French Two Round Electoral Politics: Is There a Model with Bite?" CERAPS, University of Lille, II.

November 19 2010 Colloquium. "Confessions of an Eclectic, Puzzle Loving, Reasonable Choice Modeler and Occasional Popcorn Machine." Department of Political Science, University of Copenhagen, Denmark.

November 28, 2009 Colloquium, "Models of Turnout" Institute for Governance and Economic Institutions (IRGEI), University of Paris, II

INVITED COLLOQUIA (cont.)

May, 2008. Series of talks on electoral systems and models of party competition for Economics Ph.D students associated with the Institute for Globalization and Economic Institutions (IRGEI), University of Paris, II.

Feb. 5, 2008 Colloquium, "Electoral Systems and the Promotion of Effective Power-Sharing." Sawyer Seminar Series: Power-Sharing in Deeply Divided Places, Solomon Asch Center for the Study of Ethnic Conflict, University of Pennsylvania.

May-June 2007 Series of talks on electoral systems and models of party competition for Economics Ph.D. students associated with the Institute for Globalization and Economic Research (IREGEI), University of Paris, II.

June 4, 2007 Colloquium, "Models of Committee Voting." Center for Analysis Group in Economic Theory (GATE), University of Lyon, II.

April 6, 2006 Joint colloquium, CSDP (Center for the Study of Democratic Politics) and LAPA (Law and Public Affairs), Princeton University

GRANTS FOR INSTRUCTIONAL DEVELOPMENT, COMPUTER LABS, AND GRADUATE FELLOWSHIP SUPPORT

1992-93	Grant from UCI Committee on Instructional Development to develop a new course: "Introduction to Computer Use in the Social Sciences" ($15,500)
1992	Small grant from the National Endowment for the Humanities to attend the NEH Summer Institute on "Athenian Democracy." ($3,250)
1992-94	Grant for graduate student support in Public Choice (Sarah Scaife Foundation, $50,000, with Amihai Glazer)
1993	Grant from the UC Center for German and European Studies, University of California, to develop a new course to be co-taught with Professor Pertti Pesonen (Finnish Academy) on comparative political participation ($10,000)
1994	Grant from the National Science Foundation to develop a computer lab for the technology enhanced teaching of under-graduate statistics ($55,497, with Judith Treas).
1995-99	Grant from the UC President's Office (IAPIF) to develop a long-distance learning course "The United States in Comparative Perspective." ($17,174, with Arend Lijphart.
1997	Grant from Instructional Improvement Fund (UCI Division of Undergraduate Education) to develop “Computer-Based Tutorials, and Self-Grading Homework Assignments for SS10A, Introduction to Statistics” ($5,000)
1999-00	Seed grant from UC Center for German and European Studies for graduate research support ($3,000)
2000	Grant from UCI Division of Undergraduate Education (Hewlett Foundation) for Problem-Based Learning materials for Economics 10C statistics course ($4,500)
2000-01	Seed grant from the UC Center for German and European Studies, University of California, for graduate research support ($3,000)
2004-5	Grant from Institute of European Studies to co-teach a graduate seminar with Prof. Giorgio Freddi (University of Bologna) ($12,000
2004-5	Grant from University of California, MEXUS Program to supervise doctoral research ($12,000 to Matthew Barreto)
2014-15	Grant from Koch Foundation ($5,000) to fund a one week visit to UCI by the senior Public Choice scholar, Professor Geoffrey Brennan, Australian National University.
2015-15	Grant from Koch Foundation ($5,000) to fund a one week visit to UCI by the senior Public Choice scholar, Professor Roger Congleton, West Virginia University.
2016-17	Grant from Koch Foundation ($5,000) to fund a one week visit to UCI by the senior Public Choice scholar, Professor Mark Crain
2019-20	Grant from Koch Foundation ($5,000) to fund a one week visit to UCI by the senior Public Choice scholar, Professor Iain Mclean, Oxford University.

CURRICULAR MATERIALS (in print and forthcoming)

(CM1) Grofman, Bernard N. 1979. Note: Mo Fiorina's advice to children and other subordinates. Mathematics Magazine 52(5): 292-297.

(CM2) Grofman, Bernard N. 1982. Modeling jury verdicts. University Modules in Applied Mathematics.

(CM3) Grofman, Bernard N. 1982. The pure theory of elevators. Mathematics Magazine, 55(1): 30-37.

(CM4) Straffin, Philip and Bernard Grofman. 1984. Parliamentary coalitions: A tour of models. Mathematics Magazine 57(5): 259-274.

(CM5) Grofman, Bernard. 1990. Pig and proletariat: Animal Farm as history, San Jose Studies, 16: 5-39.

(CM6) Grofman, Bernard and Craig Brians. 1998. Class notes and exercises: computer-based research methods for the social sciences. New York: Longmans.

(CM7) Grofman, Bernard. 2000. A primer on racial bloc voting analysis. In Nathaniel Persily (ed.) The Real Y2K Problem: Census 2000 Data and Redistricting Technology. New York: The Brennan Center for Justice, New York University School of Law.

(CM8) Adams, James, Bernard Grofman, and Samuel Merrill, III. Spatial Models of Politics, I: Basic Introduction. 2024 forthcoming. In Maurice Salles, Dan Felsenthal, Rudy Fara, and Nick Miller (eds.) *VoteDemocracy Project*. New York: Springer contract offered.

COURSES TAUGHT

Elections and Voter Choice
Computer-Based Research Methods in the Social Sciences (SS3A)
Introduction to Public Choice, I and II
The United States in Comparative Perspective
Representation and Redistricting
Law and Social Science
Models of Collective Decision Making
Introduction to Decision Analysis
Introduction to Research Design
Game Theory Applications in the Social Sciences
Small Group Behavior
Introduction to Mathematical Models in the Social Sciences
Coalition Theory
Political Propaganda and Satire
Elementary Statistics (PS10A)
Statistics for Public Policy Analysis (PS10B)
Statistics for Citizen Literacy (PS10C)
The Federalist Papers and the Art of Constitutional Design
Comparative Public Policy
Advanced Quantitative Methods in Political Science I
Introductory Graduate Statistics for Political Science, I and II
Spatial Models of Politics

EDITORIAL BOARDS

1972-82 Manuscript Review Board: Behavioral Science.
1980-83 American Journal of Political Science
1983-85 Law and Society Review
1986-88 Society for Orwellian Studies
1987-89 American Politics Quarterly
1989-91 Political Analysis
1991- Public Choice
1996-06 Electoral Studies
1997-01 Journal of Politics
1999-01 Advisory Board, Encyclopedia of Public Choice
2001- Election Law Journal
2001-12 Advisory Board, Rivista Italiana di Politiche Pubbliche (University of Bologna)
2006-09 Canadian Journal of Political Science
2008-10 Political Analysis
2015-17 Annals of In-Comparable Studies (on-line annual review)
2016-19 Homo Oeconomicus

OTHER REFEREEING/REVIEWING

1975- Occasional referee: American Journal of Political Science; Theory and Decision; Public Choice.
1976- Occasional referee: Political Methodology; National Science Foundation, Political Science Program.
1977- Occasional referee; Journal of the American Statistical Association; Social Science Research.
1978- Occasional referee: Psychological Review; National Science Foundation, Law and Social Sciences Program; Journal of Personality and Social Psychology; European Journal of Social Psychology; Journal of Mathematical Sociology.
1979- Occasional referee: Social Networks; National Science Foundation, Applied Mathematics Program.
1980- Occasional referee: Law and Policy Quarterly; National Institute of Mental Health; American Political Science Review, National Science Foundation, Sociology Program; National Science Foundation, Economics Program; Journal of Conflict Resolution; Legislative Studies Quarterly.
1981- Occasional referee: American Mathematical Monthly, Decision Sciences, Economic Inquiry.
1982- Occasional referee: Social Science Quarterly;Sociological Methods and Research; Western Political Quarterly (now Political Research Quarterly), Guggenheim Foundation; U.S.National Science Foundation, Developmental and Social Psychology Program; U.S. National Science Foundation, Decision, Risk and Management Science Program
1983- Occasional referee: Journal of Politics, Political Geography Quarterly (now Political Geography).
1984- Occasional referee: U.S. National Science Foundation, Information Systems Program; National Science Foundation, Program in Social Measurement and Analysis.
1986- Occasional referee: Review of Economic Studies.
1987- Occasional referee: British Journal of Political Science, Journal of Political Economy, Comparative Political Studies.
1988- Occasional referee: Social Choice and Welfare, Political Analysis, Polity.
1989- Occasional referee: National Science Foundation, Program in History and Philosophy of Science; Program in Political Science
1991- Occasional referee: Demography.
1992- Occasional referee: European Journal of Political Research.
1993- Occasional referee: Electoral Studies
1994- Occasional referee: Comparative Politics; Cambridge University Press
1994- Occasional referee: Urban Affairs Quarterly
1996- Occasional referee: Canadian Journal of Political Science
1997- Occasional referee: U.S. National Science Foundation, Program in Geography
1998- Occasional referee: Southeastern Political Review, Social Science History
1999- Occasional referee: European Journal of Political Economy

OTHER REFEREEING (cont.)

2003- Occasional referee, Society for Industrial and Applied Mathematics (SIAM)
2004- Occasional referee, Law and Society
2005- Occasional referee, European Union Politics, Scandinavian Political Studies Journal of Law, Economics & Organization
2008- Occasional referee, Austrian National Science Foundation
2009- Occasional referee, Econometrica
2013- Occasional referee, Political Science (New Zealand)
2016- Occasional referee, Swiss National Science Foundation
2017- Occasional referee, University of Pennsylvania Press
2019 Occasional Referee, Complexity
2021 Occasional Referee, Proceedings of the National Academy of Science

OTHER PROFESSIONAL SERVICE

Chair, 1982-83, Lippincott Prize Committee for book-length work in political theory, American Political Science Association.
Section Program Organizer, Panels on "Positive Theory," Annual Meeting of the American Political Science Association, Washington, D.C., August 1984.
Member, 1985-86, Working Group on Collective Choice Institutions, appointed by the Committee on Basic Research in the Behavioral and Social Sciences, National Research Council.
Member, Executive Committee, 1986-89, Section on Representation and Electoral Systems, American Political Science Association.
Chair, 1988-92, George Hallett Book Prize Award Committee, Section on Representation and Electoral Systems, American Political Science Association.
Section Program Co-organizer, Panels on "Political Organizations," Annual Meeting of the American Political Science Association, Sept. 1990.
Member, 1990-91, Lasswell Prize Committee, International Society of Political Psychology.
Member, 1995-96, Carey McWilliam Award for Journalists Committee, American Political Science Association.
Chair, 1995-96, Richard Fenno Prize Committee, Legislative Studies Section, American Political Science Association.
Member, 1998, Luebbert Book Award Committee, Comparative Politics Section, American Political Science Association.
Member, 2000-2001, Advisory Board, UCLA Center for Governance.
Member, 2001-2002, Comparative Politics Prize Committee, Sage Award for best paper in comparative politics at the American Political Science Association Annual Meeting.
Member, 2002, International Political Science Association Longley Prize Committee, Longley Award for best article published on Representation and Electoral Systems.
External Reviewer, Ten-year review, Department of Political Science, University of Bologna, November 27-29, 2003.
Member, 2007 Program Committee, First World Congress of Public Choice, Amsterdam, March 29-April 1.
Member, 2007 APSA Section on Representation and Electoral Systems, Weaver Award Committee for best paper in Representation and Electoral Systems section.
Member, 2007 APSA Heinz Eulau Award Committee for best paper in Perspectives on Politics
External Reviewer, Ph.D. Thesis of Annelise de Ridder, School of Business, University of Nijmegen, Netherland, May 2007.
External Reviewer, Ph.D. Thesis of Honorine Lescieux-Katir, Department of Economics, University of Paris, II, May 2010.
Member, 2008-11, International Advisory Committee, Centre for Voting and Parties, University of Copenhagen
Member, 2010-11 George Hallett Book Prize Award Committee, Section on Representation and Electoral Systems, American Political Science Association.
Member, 2012 Award Committee, Burdette Prize for Best Paper at the APSA Annual Meeting, American Political Science Association.
External Reviewer, Ph.D. Thesis of Michele Khouri-Hagot, Department of Economics, University of Paris, II, June 2012.

OTHER PROFESSIONAL SERVICE (cont.)

Member, International Advisory Board for the European Parliament 2014 Election Voting Advice Application (VAA) Project, European Union Democracy Observatory, European University Institute (Directed by Alex Trechsel).
Member, 2013-15, International Advisory Board, Internet Voting in Canada Project, University of Toronto, Canada (Directed by Nicole Goodman)
Member, 2014-15 Philip Converse Book Prize Award Committee, Section on Elections, Public Opinion & Voting Behavior, American Political Science Association.
Consultant, 2020-21 Princeton Gerrymandering Project

UNIVERSITY SERVICE, SYSTEMWIDE

2010-15 Member, Administrative Advisory Board, University of California Center, Sacramento

UNIVERSITY SERVICE, UCI

1977-79	Member, University Committee on Lectures
1977-79	Faculty Advisor, UCI Chapter, Student Model United Nations
1983-84	Member, University Library Committee
1987-89	Member, University Privilege and Tenure Committee Hearing Panel
1988-89	Member, Tierney Chair Search Committee
1988-91	Member, University Committee on Rules and Jurisdictions
1991-92	Acting Chair, Focused Research Program in Public Choice
1994-96	Member, University Committee on Rules and Jurisdictions
1995-96	Member, Chancellor's Taskforce on Use of Educational Technology
2000-01	Reviewer, UC System-wide Multi-campus Research Incentive Fund (MRIF)
2001-02	Member, UCI Search Committee for new Dean of Social Sciences

SERVICE TO THE SCHOOL OF SOCIAL SCIENCES, UCI

1980-81	Special Schoolwide Selection Committee: Distinguished Student Scholars Program.
1981-82	Chair, School of Social Sciences Faculty.
1991-92	Chair, Committee for the Interdisciplinary Graduate Concentration in Public Choice.
1992-	Member, Committee for the Interdisciplinary Ph.D Concentration in Public Choice
1996-02	Member, Executive Committee, UCI Center for the Study of Democracy
1999-01	Member, School of Social Sciences Executive Committee
1999-00	Co-Coordinator, Institute of Mathematical Behavioral Sciences, Colloquia
1999-05	Member, Executive Committee, Institute of Mathematical Behavioral Sciences ORU
2001-06	Member, Executive Committee, Center for the Study of Democracy
2001-06	Member, UCI Center for the Study of Democracy Leadership Council
2008-12	Director, Center for the Study of Democracy
2011-12	Member, Steering Committee, Experimental Social Sciences Laboratory
2014	Member, School External Search Committee for Chair of the Department of Political Science

SERVICE TO THE DEPARTMENT OF POLITICAL SCIENCE, UCI

1978-79	Chair, Program in Politics and Society.
1979-89	Organizer, Program in Politics and Society Colloquium Series (one quarter per year).
1997-98	Coordinator, Political Science Graduate Admissions1982-83 Acting Co-Chair, Program in Politics and Society (Spring Quarter).
1983-84	Political Science Graduate Student Adviser.
1988-89	Political Science Graduate Student Advise
1988-89	Chair, Recruitment Committee in Mathematical Political Science.
1988-91	Member, Recruitment Committee in Public Law.
1991-93	Member, Joint Recruitment Committee in African-American Studies and Political Science
1992-98	Member, Political Science Graduate Committee
1996-97	Chair, Recruitment Committee for Pacific Rim FTE in Political Science
1998-99	Member, Easton Prize Committee, Department of Political Science
1998-00	Member, Colloquium Committee, Institute for Mathematical Behavioral Science
1998-00	Member, Interdisciplinary Search Committee for positions in Mathematical Behavioral Sciences
1999-01	Member, Interdisciplinary Search Committee for joint position in Chicano/Latino Studies and Political Science
1999-00	Coordinator, Political Science Graduate Admissions
2001-02	Member, Interdisciplinary Search Committee for positions in Democratization and Democratic Transitions

SERVICE TO THE DEPARTMENT OF POLITICAL SCIENCE, UCI (cont.)

2001-02	Member, Interdisciplinary Search Committee for positions in Mathematical Behavioral Science
2002-03	Coordinator, Political Science Graduate Admissions
2002-04	Chair, Interdisciplinary Search Committee for position in Democratization and Democratic Transitions
2005-07	Graduate Director, Fellows Program, Center for the Study of Democracy
2005-06	Chair, Search Committee for position in Public Law/Judicial Behavior
2015-16	Chair, Search Committee for position in Political Methodology,
2017-18	Chair, M&P review committee for Department Chair
2020-21	Member, Merit review committee for Professor Marek Kaminski
2020-21	Member, Merit review committee for Professor Jeffrey Kopstein
2021-22	Member, Merit review committee for Professor C. Anthony Smith

RECENT GRADUATE STUDENT SUPERVISION

Completed Ph.D.s

2010	Chair, Reuben Kline (now Associate Professor of Political Science, State University of New York, Stony Brook, formerly Max Weber Post-Doctoral Research Fellow, European University Institute)
2011	Member, Honorine Lescieux-Katir, Department of Economics, University of Paris, II
2012	Chair, Fatima Rahman (now Assistant Professor of Political Science, Lake Forest College, Illinois)
2012	External Member, Ph. D. Prospectus Defense, Lorien Jasny (now Lecturer, University of Exeter, formerly Post-Doctoral Fellow, University of California, Davis, Department of Environmental Policy and Behavior).
2012	Member, Michele Khoury-Agot, Department of Economics, University of Paris, II
2013	Chair, Peter Miller (formerly Fulbright Fellow, University of Tampere, Finland; formerly Post-Doctoral Research Fellow, Program in Philosophy, Politics and Economics, University of Pennsylvania, policy analyst, Brennan Center for Law and Justice)
2013	Member, Neilan Chaturvedi, (now Assistant Professor of Political Science Seattle University)
2014	Member, Ryan Shirah (now Research Analyst, University of Tennessee)
2014	Member, Moon-Young Choi
2015	Chair, John Cuffe (now Research Analyst, U.S. Bureau of the Census)
2016	Member, Jenny Garcia (now Asst. Professor, Oberlin College)
2016	Member, Heather (Cox) Wickramachi (now International Economist analyst at the U.S. International Trade Commission)
2017	Co-Chair, Eric Mosinger (Asst. Professor, Santa Clara University; formerly Post-Doctoral Fellow, Carleton University; formerly visiting Assistant

Professor at Macalester College, St. Paul, Minnesota)
2019 Member, Ph.D committee and research supervision, Hannah Kim (now assistant Professor, University of Nebraska)
2019 Member, Ph.D committee , Maneesh Arora (now Assistant Professor at Wellesley)
2020 Chair, Ph.D. committee and research supervision, Jonathan Cervas (now in third year as Post-Doctoral Fellow at the Institute for Politics and Strategy, Carnegie Mellon University (also 2021-22 Mapping Consultant, Pennsylvania Reapportionment Commission; 2022 Special Master, New York congressional and State Senate redistricting) .
2021 Member, Ph.D. committee, Brian Kaiser
2024 Member, Ph.D. committee, Ugurcan Evci

OTHER RECENT GRADUATE SUPERVISION

2015 Member, Qualifying Paper review committee, Cristopher Stoughton
2017-18 Faculty Advisor, Nathan Chan
2017-18 Research advice, Shauna Gillooly
2018 research supervision, Nathan Cisneros
2018-19 Ph.D. supervision, Matteo Caruso, visiting CSD Fellow, University of Lucca, Italy
2019 member, Ph.D. advancement committee, Mark Bloxsom (Dept. of Economics)
2020 member, Ph.D. advancement committee, Sargis Karavardanyan
2022 research supervision, Haotian Chen, Marcelo Maciel, Zora Mihaley,, Morgan Spencer.

RECENT POST-DOCTORAL SUPERVISION
2017-18 Peter Miller (Peltason Chair Post-Doctoral Fellow)

Major Redistricting Cases in which Bernard Grofman Has
Participated as an Expert Witness or Court-Appointed Consultant

Consultant to	Case Name	Type
Republican Party of Colorado	Carstens v. Lamm, 543 F. Supp. 68 (D. Colorado, 1982)	Congress: failure of the legislature to act
Special Master, U.S. District Court, Southern District of New York	Flateau v. Anderson, 537 F. Supp. 257 (S.D. New York, 1982)	Congress and both houses of state legislatures: failure of legislature to act; minority voting rights.
Republican Party of Hawaii	Travis v. King, 552 F. Supp. 554; 552 F. Supp. 1200 (D. Hawaii, 1982)	State legislature: equal population
Democratic Party of Rhode Island and subsequently State of Rhode Island	Holmes v. Burns (Super. Ct., R.I. 1982) aff'd, No. 83-149 (R.I. S. Ct, April 10, 1984)	State house: minority vote dilution, compactness, communities of interest
Republican National Committee	Badham v. Eu, 721 F. 2d 1170 (D. Calif. 1983), dismissed for want of a federal claim, *cert*. denied	Congress: partisan gerrymandering
NAACP Legal Defense Fund	Gingles v. Edmisten, consol. with Pugh v. Brock, 590 F. Supp. 345 (E.D. North Carolina, 1984) heard *sub nom*. Thornburg v. Gingles, 106 S. Ct. 2752, 478 U.S. 30 (1986)	Multimember districts in the state legislature; Section 2 of the Voting Rights Act
U.S. Department of Justice	South Carolina v. U.S. (D.D.C., 1984) settled out of court by preclearance of a new plan for South Carolina Senate	State Senate: Section 5 of the Voting Rights Act preclearance denial
Consultant to	Case Name	Type

State of Indiana	Bandemer v. Davis 603 F. Supp. 1479 (1984), (S.D. Indiana, 1983), reversed *sub nom* Davis v. Bandemer, 106 S. Ct. 2797, 106 U.S. 2797 (1986); initially consol. with Indiana Branches of the NAACP v. Orr 603 F. Supp. 1479 (1984) (S.D. Indiana, 1983)	State legislature: partisan gerrymandering, minority vote dilution
City of Boston	Latino Political Action Committee v. City of Boston, 609 F. Supp. 739 (D. Mass. 1985)	Boston City council: minority vote dilution
U.S. Department of Justice	Ketchum v. Byrne II (D. Illinois 1985), settled by consent decree	Chicago City Council: minority vote dilution
Mexican American Legal Defense and Education Fund	Gomez v. City of Watsonville (D. Calif., 1986), 863 F. 2nd 1407 (9th cir. 1988) *cert.* denied, 109 S.Ct. 1534 (1989)	Watsonville City Council: Section 2 of the Voting Rights Act
U.S. Department of Justice	U.S. v. City of Los Angeles (D. Calif., 1986), settled out of court by adoption of a new plan for L.A. City Council with an additional majority Hispanic seat	Los Angeles City Council: Section 2 of the Voting Rights Act
NAACP Legal Defense Fund	McGhee v. Granville County, No. 87-29-CIV-5) (E.D. North Carolina 2/5/88); 860 F. 2nd 110 (4th circuit 1988)	Granville County Board of Supervisors: Section 2 of the Voting Rights Act
U.S. Department of Justice	Garza v. County of Los Angeles Board of Supervisors 918 F. 2d 763 (9th cir. 1990); new plan adopted by the court	County Board: Section 2 of the Voting Rights Act

Consultant to	Case Name	Type
Republican National Committee	Pope et al. v. Blue et al. 809 F. Supp. 392 (D. N.C, Western District, Charlotte Division, 1992)	Congressional redistricting in North Carolina: 14th Amendment
Republican Party of Wisconsin	Prosser et al. v. Election Board of State of Wisconsin 793 F. Supp. 859 (D.Wisc., 1992)	Wisconsin state legislative redistricting: Section 2 of the Voting Rights Act
State of North Carolina	Republican Party v. Martin 980 F2d 943 (4th Cir. 1992)	State-wide judicial elections in the State of North Carolina; partisan gerrymandering
Minority plaintiffs	Garcia v. City of Los Angeles, (D. Los Angeles, 1996)	City of Los Angeles Charter Commission: Section 2 of the Voting Rights Act
Republican Party of Wisconsin	Arrington et al. v. Elections Bd. of State of Wisconsin 173 F. Supp. 2d 856 U.S. (D. Wisconsin, 2002)	Wisconsin State legislative districting, Section 2 of the Voting Rights Act
Special Master, U.S. District Court, Southern District of New York	Rodriguez et al. v. Pataki et al., (S.D. N. Y., 2002) ; legislature chooses to draw new plan	Congress; failure of legislature to act; minority voting rights.
Special Master, US District Court, Georgia	Larios v. Cox 305 F Supp. 2d 1355 (N.D. GA 2004)	Georgia legislative districts; one person, one vote.
Government Accountability Board of Wisconsin	Baldus et al. v. Members of the Government Accountability Board of Wisconsin, Federal District Court, Case No. 11-CV-562 JPS-DPW-RMD. March 22, 2012	Wisconsin legislative districts
Three judge federal panel, 4th Circuit	Perhsonhuballah v. Alcorn, Case 3:13-cv-00678, District Court, Eastern District of Virginia 2015; 155 F. Supp. 3d 552 (2016)	Service to the Court as Special Master to redraw Virginia's 3rd congressional district after a previous finding that it was racially motivated

Consultant to	Case Name	Type
single judge Federal District Court	Navajo Nation v. San Juan County, Utah, 2017 No. 18-4005 (10th Cir. 2019)	Service to the Court as Special Master to redraw County Commission and School Board districts after a previous finding that these were racially motivated
Three judge federal panel, 4th Circuit	Golden-Bethune Hill v. VA Board of Elections, Case 3:14cv-852, District Court, Eastern District of Virginia, opinion filed February 13, 2019; *Virginia House of Delegates v. Bethune-Hill*, 587 U.S. ___ (2019).	Service to the Court as Special Master to redraw 11 House of Delegate districts in Virginia after a previous finding that they were racially motivated
Single judge federal district court	Wright v. Sumter County Gorgia, Case No.: 1:14-CV-42 (WLS), 2020; No. 15-13628 (11TH Circuit), October 27, 2020)	Service to the Court as Special Master to redraw 7 School Board districts after a previous finding that they violated Section 2 of the Voting Rights Act
Single judge federal district court	*Holloway v. City of Virginia Beach* CIV 2:18-cv-0069 (E.D. Virginia, Norfolk Division), September 26, 2021.	Service to the Court as Special Master to redraw City Council districts after a previous finding that they violated Section 2 of the Voting Rights Act
Virginia State Supreme Court	*In re Virginia Legislative and Congressional* Redistricting, December 28, 2021 (Report co-authored by Sean Trende) https://www.vacourts.gov/courts/scv/districting/2021_virginia_redistricting_memo.pdf	Service to the Court as co-Special Master to redraw legislative and congressional districts in Virginia after the legislature failed to enact a plan in a timely fashion
North Carolina State Supreme Court	*Harper v. Hall* 2022-NCSC-17 No. 413PA21 February 14, 2022	Mapping consultant to the three Special Masters appointed by the Court
Ohio Attorney General	*League of Women Voters of Ohio v. Ohio Redistricting Comm.*, Slip Opinion No. 2022-Ohio-342.	Mapping consultant for legislative redistricting

Consultant to	Case Name	Type
Wisconsin State Supreme Court	*Clarke*	Mapping consultant (with Jonathan Cervas) for legislative redistricting
U.S, District Court, Western District of Michigan	*Agee v. Benson* No. 1:22-cv-272	Reviewing Special Master for legislative redistricting

Ex. 201

State Ballot Measure - Statewide Results

Unofficial Election Results

Results will be certified by December 12, 2025.

(18,399 of 18,399) precincts ***partially*** *(http://vote.sos.ca.gov/frequently-asked-questions#faq-reporting)* reporting as of December 3, 2025, 7:30 a.m. (http://vote.sos.ca.gov/frequently-asked-questions#faq-reporting)

Visit the **County Reporting Status** (http://vote.sos.ca.gov/returns/status) page to determine when a county has submitted its latest report.

Vote-by-mail, provisional, and other ballots will continue to be processed and counted after Election Night.

Election results will change throughout the ballot counting canvass period as vote-by-mail ballots, provisional ballots (including conditional voter registration provisional ballots), and other ballots are tallied.

County Results

Other Links
Statewide Map
(http://vote.sos.ca.gov/contests/maps/ballot-measures)

		Proposition Title	Yes Votes	%	No Votes	%
Yes	**50**	**Congressional Redistricting**	7,452,270	64.4%	4,116,495	35.6%

Related Links

- **Official Voter Information Guide: Quick Reference Guide** (https://voterguide.sos.ca.gov/quick-reference-guide/index.htm)
- **Official Voter Information Guide: Proposition 50** (https://voterguide.sos.ca.gov/proposition/50/)

County Results

- **Statewide** (http://vote.sos.ca.gov/returns/ballot-measures)
- **Alameda** (http://vote.sos.ca.gov/returns/ballot-measures/county/alameda)
- **Alpine** (http://vote.sos.ca.gov/returns/ballot-measures/county/alpine)
- **Amador** (http://vote.sos.ca.gov/returns/ballot-measures/county/amador)

Butte (http://vote.sos.ca.gov/returns/ballot-measures/county/butte)

Calaveras (http://vote.sos.ca.gov/returns/ballot-measures/county/calaveras)

Colusa (http://vote.sos.ca.gov/returns/ballot-measures/county/colusa)

Contra Costa (http://vote.sos.ca.gov/returns/ballot-measures/county/contra-costa)

Del Norte (http://vote.sos.ca.gov/returns/ballot-measures/county/del-norte)

El Dorado (http://vote.sos.ca.gov/returns/ballot-measures/county/el-dorado)

Fresno (http://vote.sos.ca.gov/returns/ballot-measures/county/fresno)

Glenn (http://vote.sos.ca.gov/returns/ballot-measures/county/glenn)

Humboldt (http://vote.sos.ca.gov/returns/ballot-measures/county/humboldt)

Imperial (http://vote.sos.ca.gov/returns/ballot-measures/county/imperial)

Inyo (http://vote.sos.ca.gov/returns/ballot-measures/county/inyo)

Kern (http://vote.sos.ca.gov/returns/ballot-measures/county/kern)

Kings (http://vote.sos.ca.gov/returns/ballot-measures/county/kings)

Lake (http://vote.sos.ca.gov/returns/ballot-measures/county/lake)

Lassen (http://vote.sos.ca.gov/returns/ballot-measures/county/lassen)

Los Angeles (http://vote.sos.ca.gov/returns/ballot-measures/county/los-angeles)

Madera (http://vote.sos.ca.gov/returns/ballot-measures/county/madera)

Marin (http://vote.sos.ca.gov/returns/ballot-measures/county/marin)

Mariposa (http://vote.sos.ca.gov/returns/ballot-measures/county/mariposa)

Mendocino (http://vote.sos.ca.gov/returns/ballot-measures/county/mendocino)

Merced (http://vote.sos.ca.gov/returns/ballot-measures/county/merced)

Modoc (http://vote.sos.ca.gov/returns/ballot-measures/county/modoc)

Mono (http://vote.sos.ca.gov/returns/ballot-measures/county/mono)

Monterey (http://vote.sos.ca.gov/returns/ballot-measures/county/monterey)

Napa (http://vote.sos.ca.gov/returns/ballot-measures/county/napa)

Nevada (http://vote.sos.ca.gov/returns/ballot-measures/county/nevada)

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Sonoma (http://vote.sos.ca.gov/returns/ballot-measures/county/sonoma)

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Trinity (http://vote.sos.ca.gov/returns/ballot-measures/county/trinity)

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Maps (http://vote.sos.ca.gov/maps)

Close Contests (http://vote.sos.ca.gov/returns/close-contests)

My Voter Status (https://voterstatus.sos.ca.gov)

Ex. 210

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

DAVID TANGIPA, *et al.*,

Plaintiffs,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

v.

GAVIN NEWSOM, in his official capacity as the Governor of California, *et al.*,

Defendants,

DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE, *et al.*,

Defendant-Intervenors.

No: 2:25-cv-10616-JLS-WLH-KKL

DECLARATION OF WILLIAM VAN NUYS III IN SUPPORT OF DCCC'S RESPONSE IN OPPOSITION TO PLAINTIFFS' AND THE UNITED STATES'S MOTIONS FOR PRELIMINARY INJUNCTION

Hearing Date: December 15, 2025

Time: 9:00 a.m.

Courtroom: One

Pursuant to 28 U.S.C. § 1746, I, William Van Nuys III, declare as follows:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts and information set forth in this declaration.

2. I am the Deputy Executive Director of DCCC, a position I have held since January 2025. In that capacity, I help to oversee DCCC's strategy and operations, including its political strategy in California and across the country. Prior to my current role, I served as DCCC's National Political Director during the 2024 election cycle. I also served as DCCC's Western Regional Political Director and oversaw DCCC's strategy in California during the 2022 midterm election cycle.

3. DCCC, sometimes called the Democratic Congressional Campaign Committee, is the national congressional campaign committee for the Democratic Party. DCCC's mission is to elect Democratic candidates to the U.S. House of Representatives. As part of that mission, DCCC works to recruit Democratic candidates, raise funds, and help Democratic candidates win races in congressional districts throughout the country, including in California's 52 congressional districts.

4. As the national party committee dedicated to electing Democrats to the House of Representatives, and ultimately obtaining a Democratic majority in the House, DCCC has a strong interest in increasing the likelihood that Democratic congressional candidates win elections. DCCC therefore cares deeply about redistricting around the country, because redistricting significantly affects the electoral prospects of Democratic congressional candidates and the rights of Democratic voters.

5. This past summer, Texas Republicans announced a plan to re-draw congressional districts in Texas to disadvantage Democratic congressional candidates. Specifically, based on news coverage I reviewed, I understand that Texas Republicans eliminated districts currently held by Democratic House members in Houston, Dallas, Austin, and South Texas. I further understand that other states controlled by the Republican Party have undertaken similar efforts or are contemplating doing so. Finally, I understand that President Trump has exerted and continues to exert significant pressure

on states around the country to redraw their maps in a way that is maximally beneficial to Republican candidates, to the detriment of Democratic Party candidates supported by DCCC.

6. I understand that, in response to these efforts, elected leaders in California began considering whether to re-draw the congressional districts in their own state to advantage Democratic candidates.

7. During the summer of 2025, I learned that Paul Mitchell and Redistricting Partners had been working on a potential revision to California's congressional map.

8. On August 3, 2025, I, along with another DCCC staff member, first saw a draft of the proposed map that Redistricting Partners prepared ("Draft Map"). We reviewed the map exclusively for partisan performance, and we were pleased with the map because, if enacted, it would substantially increase partisan advantage for Democratic candidates as compared to California's existing map. Specifically, the Draft Map likely improved Democratic performance in Districts 1, 3, 9, 13, 22, 27, 41, 45, 47, and 48.

9. Hoping that an even more Democratically-favorable proposal would be presented to the California Legislature, DCCC supported certain revisions to the Draft Map to further improve Democratic performance, including in San Diego and the Central Valley. Redistricting Partners adopted at least some of those revisions to the Draft Map, including to improve Democratic performance in the Central Valley.

10. At no point did DCCC analyze racial data for the Draft Map, and none of the revisions we supported were based on a consideration of race or the Voting Rights Act. DCCC's interest in the Draft Map and its particulars was always focused on partisan performance. The revisions to the Draft Map that DCCC supported exclusively concerned improving the partisan performance for Democratic candidates

11. On August 14, 2025, the California State Assembly Committee on Elections and the Senate Elections and Constitutional Amendments Committee ("Committees") opened a public portal for proposals and comments regarding redistricting.

12. That same day, DCCC decided to purchase from Redistricting Partners a revised version of the Draft Map.

13. Redistricting Partners provided DCCC with the map file on August 15, 2025. On the same day, DCCC submitted the map it received, along with an accompanying cover letter, to the Legislature.

14. The map that ultimately was adopted by the state Legislature and put forward to California voters appears likely to achieve similar partisan outcomes to the map DCCC submitted on August 15, 2025.

15. That map then appeared on the California special election ballot in the November 4, 2025 election. In the months leading up to election day, Democrats and Republicans fought a fierce political campaign over Proposition 50. Republican groups opposed the measure because the map favored Democrats, and Democrats supported the measure because the map favored Democrats. DCCC was actively tracking ads and campaign materials on both sides. DCCC is not aware of any Republican campaign materials that objected to the map on the grounds that racial considerations motivated the map.

16. California voters overwhelmingly approved Proposition 50, by a nearly two-to-one margin.

17. The next day, DCCC Chair Representative Suzan DelBene released a statement concerning Proposition 50. The statement read, in relevant part: "We applaud California's leaders for giving voters the opportunity to elect a Congress next year that will work for the people, not the wealthiest few, and level the playing field in the face of corrupt Republican gerrymandering efforts across the country. The path to the Democratic majority includes flipping critical seats throughout California, and Democrats are on offense to hold newly vulnerable Republicans accountable."[1]

---

[1] DCCC, "DCCC Chair Statement on Passage of Proposition 50 in California," (November 5, 2025), https://dccc.org/dccc-chair-statement-on-passage-of-proposition-50-in-california/.

18. I have reviewed the Complaint filed in this case. I understand that Plaintiffs have alleged that DCCC "paid Redistricting Partners to draw the map" set out in Proposition 50.[2] That is not correct. DCCC learned of a map after it was initially prepared and saw it for the first time on August 3, 2025. DCCC then supported some proposed changes to that version of the map for the sole purpose of increasing the partisan performance of the map.

19. I understand that Plaintiffs seek a court order declaring that the map set out in Proposition 50 is unlawful and an injunction enjoining implementation of the new map for the now-imminent 2026 election cycle.[3]

20. Such an injunction would severely harm DCCC because Democratic congressional candidates in California would be less likely to be elected in the November 2026 midterm election if the map is enjoined.

21. An injunction would also undermine the ability of the Democratic Party to counteract the effects of redistricting efforts that other Republican-led states have undertaken or will soon undertake at the President's command.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of December, 2025, in Washington, D.C.

William Van Nuys III

William F. Van Nuys III
Deputy Executive Director, DCCC

[2] Compl. ¶¶ 51-52.

[3] *Id.* at 24.

Ex. 213

Trump on Texas redistricting: ‘We are entitled to 5 more seats’

politico.com/news/2025/08/05/trump-texas-redistricting-00493624

Giselle Ruhiyyih Ewing

August 5, 2025

Democrats are trying to block the redraw in the state by denying the state legislature a quorum.

President Donald Trump had remained quiet on the state’s redrawn map since it was introduced, despite brewing commotion over the Republican partisan gerrymander. | Tasos Katopodis/Getty Images

President Donald Trump on Tuesday said Republicans were “entitled to five more seats” in Texas, in one of his first public comments on the state’s new proposed congressional map.

Tangipa v. Newsom
DX213
2:25-cv-10616-JLSWLH-KKL

Trump had remained quiet on the state's redrawn map since it was introduced, despite brewing commotion over the Republican partisan gerrymander that prompted dozens of state Democratic lawmakers to flee the state in a last-ditch attempt to block the map's passage over the weekend.

The map could net Republicans as many as five seats in the state. It has triggered an arms race across the country, with Democratic-controlled states — most notably California — pledging to gerrymander their own maps in response.

"We have an opportunity in Texas to pick up five seats. We have a really good governor, and we have good people in Texas. And I won Texas," Trump told CNBC's Squawk Box. "I got the highest vote in the history of Texas, as you probably know, and we are entitled to five more seats."

Texas Republicans last week unveiled a new congressional map of the state that, if passed by the state's legislature, would boost the party's chances of maintaining control of the House in the 2026 midterms. It came after pressure from the Trump aides to redraw the map, along with the Department of Justice alleging that the previous map could be illegal, even as Trump makes it clear the redraw is predominantly driven by politics.

Scores of Democratic state lawmakers left the state in an attempt to stop Republicans from implementing the map by denying the legislature a quorum. Texas Gov. Greg Abbott has repeatedly vowed to expel the absent Democrats from the legislature if they fail to return to the state for its ongoing special session.

Trump on Tuesday bashed the departed Democrats, some of whom fled to Illinois on Sunday, calling the situation "terrible."

Andrew Howard contributed to this report.

Filed Under:

- White House
- Donald Trump
- Texas

- Redistricting
- Politics
- Greg Abbott

Ex. 220

Multimedia exhibit available at
https://app.box.com/s/lmpsnbcg027ijtqizn0nvlluymigvsdc

Ex. 223

NO50

Protect Citizen Maps | The Threat | Voices For Democracy | In the News | Take Action

A Threat to California's Landmark Election Reform

For decades, Sacramento politicians drew their own district boundaries behind closed doors with no public oversight — guaranteeing their reelection, denying voters a real choice, and shutting out many women and people of color from elected office.

In 2010, California voters overwhelmingly approved the Voters FIRST Act for Congress — entrusting the independent Citizens Redistricting Commission to draw fair congressional districts.

Now, career politicians want to abolish citizen-drawn maps and put themselves back in charge of redistricting.

Prop 50 creates one of the most extreme partisan gerrymanders in modern American history — creating politician-drawn maps that experts call **"one of the two worst gerrymanders of the last 50 years."**

Gerrymandering is wrong in all 50 states

– when political parties subvert the will of the electorate for their own political advantage,

it weakens democracy everywhere.

Join us to help protect democracy.

Vote NO on Gerrymandering and Join the Coalition to Protect the Voters FIRST Act!

NO VOTE NO ON PROP 50
Protect independent redistricting
TAKE ACTION NOW

Tangipa v. Newsom
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2:25-cv-10616-JLSWLH-KKL

Who is Charles Munger, Jr.?

Paid for by No on Prop 50 – Protect Voters First, sponsored by Hold Politicians Accountable. Committee's top funder: Charles Munger, Jr.

Privacy Policy

Ex. 234

Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically RECEIVED on 8/25/2025 10:37:11 AM

Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically FILED on 8/25/2025 by M. Chang, Deputy Clerk

S292592

Case No.

IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA

ASSEMBLYWOMAN KATHRYN SANCHEZ; ASSEMBLYMAN TRI TA; SENATOR SUZETTE VALLADARES; SENATOR TONY STRICKLAND; ERIC CHING; MIKE WARD; ANDREW PANDOL; and ROGER HOLLAND,
Petitioners,

v.

SHIRLEY N. WEBER,
California Secretary of State, In Her Official Capacity,
Respondent,
and
LEGISLATURE OF THE STATE OF CALIFORNIA,
Real Party in Interest.

EMERGENCY PETITION FOR WRIT OF MANDATE OR OTHER EXTRAORDINARY OR IMMEDIATE RELIEF; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATIONS OF MICHAEL A. COLUMBO; SEAN TRENDE; ANDREW PANDOL; AND TONY STRICKLAND

LEGISLATIVE ACTION IN VIOLATION OF CALIFORNIA CONSTITUTION ARTICLE XXI, §§ 1, 2, ARTICLE IV, § 8(a), AND ARTICLE XVIII, § 1

IMMEDIATE RELIEF REQUESTED –
NO LATER THAN SEPTEMBER 08, 2025

MICHAEL A. COLUMBO (SBN: 271283)
MARK P. MEUSER (SBN: 231335)
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Tangipa v. Newsom
DX234
2:25-cv-10616-JLSWLH-KKL

IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA

CERTIFICATE OF INTERESTED ENTITIES OR PERSONS

California Rules of Court, rules 8.208, 8.490(i), 8.494(c), 8.496(c), or 8.498(d)

Supreme Court Case Caption:

ASSEMBLYWOMAN KATHRYN SANCHEZ; ASSEMBLYMAN TRI TA; SENATOR SUZETTE VALLADARES; SENATOR TONY STRICKLAND; ERIC CHING; MIKE WARD; ANDREW PANDOL; and ROGER HOLLAND,
Petitioners,

v.

SHIRLEY N. WEBER,
California Secretary of State, In Her Official Capacity,
Respondent,
and
LEGISLATURE OF THE STATE OF CALIFORNIA,
Real Party in Interest.

Please check here if applicable:

☒ There are no interested entities or persons to list in this Certificate as defined in the California Rules of Court.

Date: August 25, 2025

/s/*Michael A. Columbo*
MICHAEL A. COLUMBO (SBN: 271283)
DHILLON LAW GROUP INC.
177 Post Street, Suite 700
San Francisco, California 94108
Party Represented: *Petitioners*

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EMERGENCY PETITION FOR WRIT OF MANDATE OR OTHER EXTRAORDINARY OR IMMEDIATE RELIEF

To the Honorable Patricia Guerrero, Chief Justice of the Supreme Court of California, and to the Honorable Associate Justices of the Supreme Court of California:

I. INTRODUCTION

Redistricting as regulated by the California Constitution is not just a take-it-or-leave-it decision over a proposed map. Long before a map is proposed for a final decision or certified, regardless of who draws it, redistricting is a laborious *process* that requires extensive technical analysis and careful balancing of complex constitutional and statutory mandates. Because it is among the most consequential acts of government—with the potential, if not the goal, of determining who will win an election before it is even held, it is inherently a tumultuous and contentious process. At its core, notwithstanding one-person-one-vote and the equal protection of the laws, the outcome of the redistricting process determines which voters indeed will likely choose our representatives in Congress and who likely will not. In a vast state like California, with nearly 40 million people and, at 52 representatives, by far the largest congressional delegation of any state, the work required and the public tumult the redistricting process causes is also commensurately vast.

Considering the stakes, the disruption, and the public's distaste for a history of self-serving partisan gerrymandering, the people of California enshrined in their constitution fundamental rules by which they would have the redistricting process undertaken in this state: (1) The work of redistricting and as well as the power that goes with it were intentionally taken away from the partisan California Legislature and given to an independent citizens redistricting commission; (2) barring a court order, the inherent tumult of the redistricting process could only occur once per decade; (3) to protect their

rights the redistricting process would involve extensive public engagement; and (4) the people expressly prohibited partisan gerrymandering.

On August 18, 2025, the State Assembly and State Senate introduced three interrelated measures: Assembly Bill 604 ("AB 604"), Assembly Constitutional Amendment 8 ("ACA 8"), and Senate Bill 280 ("SB 280"). Respectively, these measures redraw the boundaries of California's congressional districts, propose effectively transferring the power to do so from the Commission to the Legislature, and call for a statewide special election on November 4, 2025, for the purpose of approving that transfer of power.

Not only does Respondent's redistricting gambit violate every one of these core constitutional restrictions, but they also rammed this complex scheme comprising hundreds of pages of data through the Legislature in just 4 days, in violation of the Constitution's Article IV, § 8(a) requirement for 30 days' public notice of new legislation.

Finally, even if the entire litany of unconstitutional actions of the Legislature to ram their scheme through the legislature and onto the ballot are set aside, the measure that will be presented to the voters violates the single-subject rule by illegally calling for voters to approve two separate questions on two separate subjects based on two different legal authorities and representing conflicting policy choices. Specifically, the measure calls for voters to approve both a provision calling for California to petition Congress to promote independent citizens commissions, which the state has the power to do based on the U.S. Constitution, as well as calling for voter approval of provisions to amend the California Constitution to strip redistricting power from California's independent redistricting commission, void the maps the Commission created, and implement maps concocted in secret by unknown operatives.

Allowing this unconstitutional measure onto the ballot would impose needless costs and uncertainty on both election officials and the public. Counties must engage in substantial labor to prepare for and administer an election, including the time necessary to recalibrate voting systems, prepare polling places, re-educate voters, prepare and mail ballots, and collect, verify, and count ballots. (To say nothing of the hundreds of millions of private dollars that will be wasted on advocacy campaigns for and against this measure instead of being put to more worthy causes.)

This Court has long recognized that the Constitution places limits on both the People and the Legislature in matters of redistricting. The proposed measures exceed those limits, representing an unlawful attempt in several respects to exercise authority that the Legislature does not possess. Thus, judicial intervention now—before public resources are wasted on an election that cannot produce a valid law—is both proper and necessary.

This Writ thus seeks extraordinary relief to prevent such circumstances from occurring. Specifically, by this petition, Petitioners ask this Court to enforce our Constitution's clear and direct requirements by directing the Secretary of State to refrain from placing ACA 8 on the November 4, 2025, ballot.

PETITIONER RESPECTFULLY REQUESTS IMMEDIATE RELIEF, NOT LATER THAN SEPTEMBER 08, 2025

II. QUESTIONS PRESENTED

The question presented here is whether the Legislature may lawfully place on the November 4, 2025 ballot a measure that both: (A) proposes petitioning Congress to institute independent citizens redistricting commissions nationwide to draw voting district maps; and (B) proposes discarding maps created by California's independent citizen's redistricting commission to implement legislation and maps developed in secret by unknown members of the Legislature even though (1) one ballot measure cannot lawfully pose a question on two separate subjects; (2) the state Constitution currently vests exclusive authority to engage in the redistricting process in the Citizens Redistricting Commission after taking that power away from the Legislature and imposes other requirements the Legislature ignored; (3) the state Constitution limits redistricting to once per decade; and (4) the state Constitution prohibits action on legislation unless it has been published for 30 days.

III. PARTIES

1. Petitioners, Assemblywoman Kathryn Sanchez, Assemblyman Tri Ta, Senator Suzette Valladares, and Senator Tony Strickland, are members of the California Legislature and residents of the State of California.

2. Petitioner Eric Ching is a resident of Walnut, California, a registered California voter, and a former and future candidate for U.S. Congressman from the 38th Congressional District in California.

3. Petitioner Mike Ward is a resident of Anaheim, California, and was one of the original members of California's Citizens Redistricting Commission in 2008.

4. Petitioner Andrew Pandol is a resident of Bakersfield, California, and a registered California voter.

5. Petitioner Roger Holland is a resident of San Clemente, California, and a registered California voter.

6. Respondent Secretary of State Shirley N. Weber is the Secretary of State of the State of California. The Secretary of State is the Chief Election Official in the State of California and is responsible for overseeing the Elections Division, which facilitates all statewide elections in California.

7. Real Party in Interest is the Legislature of the State of California, which passed ACA 8 pursuant to California Constitution, Article XVIII, § 1.

IV. JURISDICTION

8. This Court has original jurisdiction to decide this matter pursuant to Article VI, § 10 of the California Constitution, Code of Civil Procedure §§ 1085 and 1086, and Rule 8.486 of the California Rules of Court. As the Court held in *Clean Air Constituency v. California State Air Resources Board* (1974) 11 Cal.3d 801, 808:

> The Supreme Court has original jurisdiction in mandamus pursuant to article VI, section 10, of the California Constitution, and will exercise that jurisdiction in appropriate cases when 'the issues presented are of great public importance and must be resolved promptly.' [Citations.] If these criteria are satisfied, the existence of an alternative appellate remedy will not preclude this court's original jurisdiction.

This case involves fundamental questions of the Legislature's authority to place on the California ballot an initiative that contains two different subjects with conflicting positions, and where the legislation proposing the initiative violated numerous provisions of the California Constitution. Absent immediate intervention, Respondent will mail a

November 4, 2025, election ballot that will include the unlawful dual-subject measure that the Legislature has unlawfully promulgated.

V. FACTS AND LAW

9. California Constitution, Article XVIII, § 1 provides that the Legislature shall prepare each proposed constitutional amendment such that "[e]ach amendment . . . can be voted on separately."

10. California Constitution, Article XXI, § 1 states:

> In the year following the year in which the national census is taken under the direction of Congress at the beginning of each decade, the Citizens Redistricting Commission described in Section 2 shall adjust the boundary lines of the congressional … districts (also known as "redistricting") in conformance with the standards and process set forth in Section 2.

11. California Constitution, Article XXI, § 2 provides that the process for adjusting the boundaries of congressional districts must, *inter alia*: be "an open and transparent process enabling full public consideration of and comment on the drawing of district lines"; maintain the "geographic integrity of any city, county, city and county, local neighborhood, or local community of interest . . . in a manner that minimized their division to the extent possible" without violating federal law or geographic continuity; not consider "[t]he place of residence of any incumbent or political candidate"; and refrain from drawing districts "for the purpose of favoring or discriminating against an incumbent, political candidate, or political party."

12. California Constitution, Article IV, § 8(a) states:

> At regular sessions no bill other than the budget bill may be heard or acted on by committee or either house until the 31st day after the bill is introduced unless the house dispenses with this requirement by rollcall vote entered in the journal, three fourths of the membership concurring.

13. On February 5, 2025, Senator Sabrina Cervantes introduced SB 280, entitled "An act to amend Section 84309 of the Government Code, relating to the Political Reform Act of 1974." A true and correct copy of SB 280, as introduced, is attached hereto as Exhibit 1. SB 280 was passed by a vote of 39–0 in the Senate on May 29, 2025, and ordered to the Assembly, where until August 18, 2025, it had been read on the floor of the Assembly twice, with no additional progress.

14. On February 13, 2025, Assemblymember Marc Berman introduced AB 604, entitled "An act to repeal Section 2226 of the Elections Code, relating to elections." A true and correct copy of AB 604, as introduced, is attached hereto as Exhibit 2. AB 604 was passed by a vote of 75–1 in the Assembly on April 4, 2025, and ordered to the Senate, where, until August 18, 2025, it had been read on the floor of the Senate once and referred to the Senate Committee on Elections and Constitutional Amendments, with no additional progress.

15. On August 14, 2025, Governor Gavin Newsom, alongside state and legislative leaders, announced plans to introduce a new legislative package during the week of August 18, 2025, for a state constitutional amendment that would permit the Legislature to redraw the boundaries of California's congressional districts, discarding the work of the California Citizens Redistricting Commission in 2021 before the decennial federal census in 2030.

16. It has been reported and acknowledged by legislative leaders that, in fact, a group under the leadership of certain members of Congress from California with funding from national political committees had already spent the prior month beginning the process of redistricting and gave the fruits of their efforts to the Legislature just days before the Legislative session had begun, and long before any measure approved by the voters in a future special

election would have authorized them or the Legislature to engage in the redistricting process.

17. Under California Constitution, Article IV, § 8(a), any such new legislation transferring the power to redistrict from the Commission to the Legislature or anyone else could not be heard or acted upon by any committee or either house until September 18, 2025—31 days after the introduction of the new legislation on August 18, 2025—at the earliest.

18. On August 18, 2025, the State Senate, over the objections of several Senators, sought to circumvent Article IV, § 8(a) by an amendment of AB 604 that deleted its previous text and replaced it with text describing new congressional boundaries that would replace those drawn by the independent citizens commission and remain in effect until the Commission certified a new map of congressional districts in 2031. A true and correct copy of AB 604, as amended on August 18, is attached hereto as Exhibit 3.

19. That same day, the State Assembly amended ACA 8, a proposed amendment previously concerning the procedures incumbent judges must follow when seeking successive terms, to provide instead for the voters' approval of an advisory measure to the U.S. Congress, requesting that it propose an amendment to the U.S. Constitution to require the use of independent redistricting commissions nationwide, and the voter's ratification of the Legislature's secretly drawn congressional district map described in AB 604. A true and correct copy of ACA 8, as amended on August 18, 2025, is attached hereto as Exhibit 4.

20. There are at least some registered California voters who desire to vote one way on the advisory measure in ACA 8, and a different way on the substantive change ACA 8 makes to the California constitution.

21. The Assembly also amended SB 280, over the objections of several legislators, to call for a special election on November 4, 2025, at which the

people of California would decide ACA 8. A true and correct copy of SB 280, as amended on August 18, is attached hereto as Exhibit 5.

22. On August 21, 2025, the State Assembly amended ACA 8 again and removed language that had previously conditioned the operability of AB 604 on Texas, Florida, or any other State adopting a new congressional map before January 1, 2031. A true and correct copy of ACA 8, as amended on August 21, 2025, is attached hereto as Exhibit 6.

23. The congressional districts reflected in AB 604 were drawn without public notice, hearings, or input, and for an express partisan purpose.

24. AB 604's proposed maps would carve up counties 114 times and cities 141 times, more and differently than current maps; dissect the historically Chinese- and Asian-American contiguous communities of Walnut, Diamond Bar, Rowland Heights, and Chino Hills into three different districts; cleave the Hispanic enclaves of Baldwin Park, El Monte, Pico Rivera, and part of Stockton from their existing districts; and shatter San Joaquin County into five separate districts, slicing Stockton's southern Hispanic core from the district containing the rest of Stockton.

25. At no time was a vote taken on either AB 604 or SB 280 to dispense with the State Constitution's requirement that the Legislature refrain from acting upon new legislation until the 31st day following its introduction.

26. On August 21, 2025, AB 604 and SB 280 were passed by floor votes in their houses of origin.

27. On August 22, 2025, Governor Gavin Newsom signed AB 604 and SB 280 into law.

VI. TIMELINESS OF PETITION AND REQUESTED RELIEF

28. This Petition is filed within four days of AB 604 and SB 280 being signed into law by Governor Newsom and ACA 8 being proposed to Californians for approval on November 4, 2025. The urgency of resolving

this issue expeditiously is demonstrated by the fact that, without action by this Court, Respondent will direct county registrars across the State to begin preparing for an election on November 4, 2025. Californians will also be required to begin preparing for the election. This includes what is expected to be a campaign on which hundreds of millions of dollars will be spent. Therefore, any delay in granting the relief Petitioners seek runs the risk of forcing counties and Californian voters to incur significant and ultimately meaningless costs to hold and participate in an election on an unconstitutional ballot measure.

29. "[P]reelection review here is essential to further the underlying principle which is being invoked." (*Legislature v. Deukmejian* (1983) 34 Cal.3d 658, 667.) Redistricting subjects the body politic to inevitable "turmoil and disruption." (See *ibid.*) That is precisely why the State Constitution limits redistricting to a decennial basis. (*Ibid.*) The Legislature and others have, in violation of the California Constitution, secretly engaged in the redistricting process for weeks and have already triggered the extreme "turmoil and disruption" this Court feared. If the Court defers judicial review until after the November 4, 2025 special election, its ruling would come too late to avoid the turmoil and disruption of redistricting ("part of the reason for the existence of the [once-per-decade] rule would already have been frustrated by default." [*Ibid.*]) and the expenditure of hundreds of millions of dollars in taxpayer and private funds.

30. This Court may grant the interim relief requested pending review of the writ, whether it requests oral argument or not. This case is best suited for resolution by this Court, rather than a superior court or the Court of Appeals, because this matter presents issues of statewide public importance and constitutional interpretation that require speedy and final resolution. This Court has recognized its responsibility to exercise original jurisdiction in cases of great urgency and constitutional importance. (*California*

Redevelopment Ass'n v. Matosantos (2011) 53 Cal.4th 231, 253) (assuming original jurisdiction to resolve matters of "sufficiently great importance" that require "immediate resolution")). Like *Matosantos*, this case involves a time-sensitive constitutional question with statewide implications that must be resolved immediately to avoid irreparable harm. If Petitioners were first to file a writ in a superior court or the Court of Appeals, the non-prevailing parties could then seek review in this Court, with additional opportunities for delay at each stage. Such a prolonged process would preclude the timely resolution of a fundamental constitutional question.

VII. IRREPARABLE INJURY/NECESSITY FOR RELIEF

31. Petitioners have no plain, speedy, and adequate remedy at law, other than the relief sought in this request.

32. As California residents, Petitioners would be harmed in that they would be subjected to extensive tumult as a result of redistricting, only for the maps approved by Californians to be invalidated in a later proceeding. (See *Am. Fed'n of Lab. v. Eu* (1984) 36 Cal.3d 687, 697 ["The presence of an invalid measure on the ballot steals attention, time and money from the numerous valid propositions on the same ballot. It will confuse some voters and frustrate others, and an ultimate decision that the measure is invalid, coming after the voters have voted in favor of the measure, tends to denigrate the legitimate use of the initiative procedure."].)

33. Petitioners would also be harmed if ACA 8 is allowed onto the November 4, 2025, ballot because they would be required to express a singular view as to multiple provisions with conflicting subjects and purposes. It is a fundamental principle in California that the Legislature may not engage in redistricting in the first instance, and its secret redistricting and legislative blitz has already begun inflicting on the people of California the cost, turmoil, and disruption of redistricting. Even if it could, AB 604 is an untimely and procedurally improper exercise of that authority. Furthermore,

this Court has already recognized that under the California Constitution, redistricting can only occur once every decade.

VIII. PRAYER FOR RELIEF

WHEREFORE, Petitioners pray that this Court:

(a) Grant the Petitioners' Petition for Writ of Mandate without a hearing, requiring Respondent and all persons acting pursuant to her direction, including all county registrars of voters, to refrain from taking any steps to place ACA 8 on any statewide election ballot or submitting ACA 8 to the voters for approval.

(b) Alternatively, issue an order to show cause why Petitioners' Petition for Writ of Mandate—which requires Respondent and all persons acting pursuant to her direction, including all county registrars of voters, to refrain from taking any steps to place ACA 8 on any statewide election ballot or submitting ACA 8 to the voters for approval—should not be granted; issue the interim stay relief requested herein requiring Respondents to refrain from taking any steps to place ACA 8 on any statewide election ballot or submitting Assembly Constitutional Amendment 8 to the voters for approval pending the Court's determination on the merits; and hold a hearing and decide the matter not later than September 08, 2025; or,

Respectfully submitted,

Dated: August 25, 2025

Dhillon Law Group Inc.

By: /s/*Michael A. Columbo*

Michael A. Columbo
Mark P. Meuser
Jesse Franklin-Murdock

Attorneys for Petitioners

MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF EMERGENCY PETITION FOR WRIT OF MANDATE OR OTHER EXTRAORDINARY OR IMMEDIATE RELIEF

Petitioners hereby respectfully bring this Emergency Petition for Writ of Mandate or Other Extraordinary or Immediate Relief under Article VI, § 10 of the California Constitution, Code of Civil Procedure §§ 1085 and 1086, Rule 8.486 of the California Rules of Court, and *Clean Air Constituency v. California State Air Resources Board* (1974) 11 Cal.3d 801, 808.

I. INTRODUCTION

Petitioners seek this Writ of Mandate pursuant to Article VI, § 10 of the California Constitution, Code of Civil Procedure §§ 1085 and 1086, and Rule 8.486 of the California Rules of Court, contending that ACA 8 is an unconstitutional exercise of legislative authority, because it violates Article XVIII, § 1 in that it fails to follow the separate vote requirement (the "single subject rule"). The Legislature's redistricting, which ACA 8 seeks voters' retroactive approval of, also violates Article XXI, §§ 1, and 2 of the California Constitution, which specifically confer redistricting authority upon the Commission and limits the exercise of such authority to once per decade and regulates how redistricting must be done. ACA 8's existence is dependent upon AB 604 which violated the requirement in Article IV, § 8(a) that any measure enacted be introduced at least 30 days before heard or acted upon by the Legislature.

This case presents the straightforward but urgent question of whether the Legislature may, in the middle of the decade, usurp the Citizens Redistricting Commission (the "Commission") and impose new congressional district lines with criteria that differ from the state Constitution's requirements for a redistricting process. Our State Constitution is clear that it may not. It entrusts redistricting exclusively to the Commission and permits redistricting to occur only once per decade, in the

year following the federal census, and it regulates how redistricting must be done. Those limits exist for a reason. Redistricting is disruptive, contentious, and prone to abuse by its very nature. The people of California have specified in the Constitution how they wish redistricting to be conducted and by whom. Thus, any redistricting process in violation of their terms is unconstitutional.

Nevertheless, the Legislature has enacted Assembly Bill 604 ("AB 604") and placed Assembly Constitutional Amendment 8 ("ACA 8") on the November 4, 2025, ballot to make AB 604 operative. These measures ask the People to retroactively approve completed actions by the Legislature that the Constitution forbids. This Court has consistently exercised its authority to prevent unconstitutional measures from reaching the ballot, especially when the harm lies not only in the substance of the proposal but in the instability caused by submitting an invalid choice to voters. The harm here is unmistakable. If allowed to proceed, ACA 8 would sow confusion among the State's electorate and force counties and other localities to expend millions of dollars to hold a rushed election, all in service of an unlawful redistricting plan concocted in secret by someone other than the sole authority the Constitution authorizes for redistricting and in violation of the Constitution's requirements for redistricting.

Immediate judicial intervention is, therefore, necessary. The Constitution's guardrails on redistricting are essential to ensuring that Californians are spared from the political influence and inherent turbulence of perpetual map-drawing in the hands of the Legislature. ACA 8 violates those guardrails by rendering an unconstitutional bill operative and, thus, must be removed from the ballot immediately. This petition seeks such relief.

II. ARGUMENT

A. This Court Has Jurisdiction to Remove Unconstitutional Measures from the Ballot Before the Election

It is well settled that this Court has a responsibility to safeguard constitutional guarantees by striking from ballots those proposals that would produce constitutionally invalid results. (See *Legislature v. Weber* (2024) 16 Cal.5th 237, 252 ["[P]reelection review is proper for challenges that go 'to the power of the electorate to adopt the proposal in the first instance.'" [quoting *Legislature v. Deukmejian* (1983) 34 Cal.3d 658, 667]]; see also *Am. Fed'n of Lab. v. Eu* (1984) 36 Cal.3d 687, 715–716 [issuing writ of mandate prohibiting the inclusion of a Balanced Budget Initiative on the ballot]; *Senate v. Jones* (1999) 21 Cal.4th 1142, 1168–1169 [issuing a writ of mandate as to a ballot measure that would violate the single subject rule before its inclusion on the ballot]; *Costa v. Superior Ct. (Sacramento)* (2006) 37 Cal.4th 986, 1006 [collecting cases in which preelection review was appropriate where the proposed initiative measure failed to comply with the essential procedural requirements necessary to qualify an initiative measure for the ballot].)

As discussed below, Petitioner's challenge here meets the requirements for preelection review because it "goes to the power of the electorate to adopt the proposal in the first instance." (*Weber*, *supra*, 16 Cal.5th at p. 252.) The legislative authority of the People does not exceed that of the Legislature. (See *Deukmejian*, *supra*, 34 Cal.3d at p. 675.) Thus, the People may not enact a statute that the Legislature itself has no authority to enact. (*Bldg Indus. Ass'n v. City of Camarillo* (1986) 41 Cal.3d 810, 821.) Whether a statute subject to voter approval receives sufficient public support is inconsequential: "[V]oter consent cannot convert an unconstitutional [statute] into a constitutional one." (*Silicon Valley Taxpayers' Ass'n v. Santa Clara Cnty. Open Space Auth.* (2008) 44 Cal.4th 431, 449; see *In re*

Marriage Cases (App. 2006) 49 Cal.Rptr.3d 675, 724, revd. on other grounds (2008) 43 Cal.4th 757 ["Of course, the mere fact that a majority wishes it so cannot save an otherwise unconstitutional law."].)

Therefore, this Court may issue a writ requiring Respondent to remove ACA 8 from the ballot on the basis that the statute that ACA 8 would authorize—AB 604—is unconstitutional.

B. ACA 8 Violates the California Constitution's Separate Vote Requirement

Article XVIII, § 1 of our State Constitution provides:

> The Legislature by rollcall vote entered in the journal, two-thirds of the membership of each house concurring, may propose an amendment or revision of the Constitution and in the same manner may amend or withdraw its proposal. **Each amendment shall be so prepared and submitted that it can be voted on separately**.

(emphasis added).

This Court has interpreted this requirement (the "separate vote requirement") as precluding the Legislature from, within any single amendment, proposing "two changes to the state Constitution that are not germane to a common theme, purpose, or subject." (*Californians for an Open Primary v. McPherson* (2006) 38 Cal.4th 735, 738.) In this way, the separate vote requirement mirrors the limitations imposed on the People's initiative power under Article II, § 8(d) of our State Constitution (*id.* at p. 776), which requires that the various provisions of every initiative measure be "reasonably related to a common theme or purpose" (the "single subject rule"). (*Legislature v. Eu* (1991) 54 Cal.3d 492, 512; accord *Senate v. Jones* (1999) 21 Cal.4th 1142, 1157 [An initiative measure conforms to the single-subject rule if "all of its parts are reasonably germane to each other, and to the general purpose or object of the initiative." [cleaned up].)

The purpose of the separate vote requirement is clear: "[T]he provision is designed to limit legislative power by barring submissions that otherwise might cause voter confusion or constitute 'logrolling'—that is, the practice of combining two or more unrelated provisions in one measure, thereby forcing a single take-it-or-leave-it vote on matters that properly should be voted upon separately." (*McPherson*, *supra*, 38 Cal.4th at p. 749; accord *id.* at p. 765) The consistent interpretation of "essentially identical" provisions adopted by at least a dozen other states illustrates this intention. (*Id.* at pp. 749–750 [citing cases].)

ACA 8 violates the separate vote provision because it plainly joins two provisions that are unrelated to a "common theme or purpose." (*Eu*, *supra*, 54 Cal.3d at p. 512.) Section 4(a) of the proposed amendment states:

> It is the policy of the State of California to support the use of fair, independent, and nonpartisan redistricting commissions nationwide. The people of the State of California call on the Congress of the United States to pass federal legislation and propose an amendment of the United States Constitution to require the use of fair, independent, and nonpartisan redistricting commissions nationwide.

(Exhibit 6, at 2.) This is an advisory measure that calls upon Congress to adopt a nationwide requirement that independent commissions draw congressional districts.

Section 4(b) of ACA 8, by contrast and in relevant part, requires that "the single-member districts for Congress reflected in Assembly Bill 604 . . . be used for every congressional election . . . commencing on or after [November 4, 2025] and before [the certification of the Commission's congressional map in 2031]." This is a substantive amendment that immediately alters California's redistricting process by making AB 604's Legislature-drawn districts operable until 2031.

The first provision—Section 4(a)—does not change California's constitutionally mandated redistricting system at all. It is a precatory measure, intended to communicate the People's wishes to Congress that independent commissions become the exclusive means of redistricting across the nation. The second provision—Section 4(b)—by contrast, revokes the exclusive constitutional authority to redistrict from California's own redistricting commission, discards the current maps in place that the Commission adopted in compliance with the state Constitution's requirements, and asks the voters to retroactively adopt maps proposed by the Legislature before given the power to do so and pursuant to a redistricting process that violates the Constitution's requirements for such processes.

These two provisions are not "germane to a common theme, purpose, or subject." (*McPherson*, *supra*, 38 Cal.4th at p. 738.) Section 4(a) seeks to influence federal constitutional standards while Section 4(b) directly reshapes California's governance. More importantly, however, by appearing as part of a single measure—upon which voters are only permitted to vote in the affirmative or negative, as to its entirety—Californians are forced into the very "take-it-or-leave-it" circumstances the separate vote requirement was designed to prevent. (*Id.* at p. 749.)

If a voter wishes to express support for nationwide independent redistricting, they must nonetheless accept California's abandonment of its own independent redistricting system in favor of legislative control. Likewise, if a voter wishes to reject legislative redistricting in California because they believe independent redistricting should first be universally implemented, they must also reject the opportunity to call upon Congress to seek the adoption of a nationwide policy that conforms to their beliefs. On the other side of the issue, if a voter believes that states should refrain from using independent commissions and, therefore, supports the use of the districts reflected in AB 604, they must, under ACA 8, endorse a call to

enshrine the use of independent commissions in the federal constitution. At least two of the Petitioners here will be faced with this Hobson's choice should ACA 8 appear on the November ballot. (See Declaration of Andrew Pandol at ¶¶ 3–4; Declaration of Tony Strickland at ¶¶ 3–4.)

This is precisely the kind of compelled trade-off the separate vote provision forbids. If ACA 8 appears on the November ballot as written, Californians will be unable to evaluate the merits of the advisory proposal and the substantive alteration of California's redistricting scheme separately. Therefore, ACA 8 fails to adhere to this constitutional requirement.

"The normal remedy for violation of the separate-vote provision [is] either (1) a preelection order barring submission of the measure to the voters in a single package, or (2) postelection invalidation of a measure that improperly was submitted to the voters in a single package." (*McPherson*, *supra*, 38 Cal.4th at p. 780.) The Court should not, however, permit both measures to appear on the ballot in a bifurcated fashion under normal circumstances. (*Id.* at p. 781 ["Nothing in the language or history of article XVIII generally, or of the separate-vote provision in particular, suggests that a violation of the provision should be remedied by bifurcation of proposed amendments and the presentation of those matters to the electorate in separate measures."].)

Because Petitioners are filing this petition before the November 4, 2025, special election, the proper remedy in light of this violation is for this Court to remove ACA 8 from the ballot entirely.

C. AB 604 as an Unconstitutional Exercise of Legislative Authority Subject to Judicial Review

When the Legislature takes actions that conflict with the constitutionally defined limits of its authority, this Court is empowered to intervene and declare such actions unconstitutional. (*City of Sacramento v. Legislature* (1986) 187 Cal.App.3d 393, 397 ["It is within the legitimate

power of the judiciary to declare the action of the Legislature unconstitutional, where that action exceeds the limits of the supreme law." [emphasis omitted]]; *Campaign for Quality Educ. v. State* (2016) 246 Cal.App.4th 896, 905 [same]; *California Ass'n for Safety Educ. v. Brown* (1994) 30 Cal.App.4th 1264, 1284 [same]; *California Sch. Bds. Ass'n v. State* (2018) 19 Cal.App.5th 566, 585, as modified on denial of reh'g (Feb. 7, 2018), aff'd, (2019) 8 Cal.5th 713 [quoting *Lockard v. City of Los Angeles* (1949) 33 Cal.2d 453, 461–462].)

It is well established that where our State Constitution "specifically confers power" upon a government entity, "the Legislature cannot directly or indirectly remove that power from the [entity's] control." (See *Carmel Valley Fire Protection Dist. v. State* (2001) 25 Cal.4th 287, 304 [citing *State Bd. of Educ. v. Levit* (1959) 52 Cal.2d 441, 461–462]; cf. *Howard Jarvis Taxpayers Ass'n v. Bowen* (2011) 192 Cal.App.4th 110, 127 [Legislature may not interfere with duties specifically assigned to the Attorney General].) Even if the Legislature will, at some point in the future, gain authority presently committed to another arm of the government, it still may not act as if it presently has such authority. (See *Howard Jarvis Taxpayers Ass'n*, *supra*, 192 Cal.App.4th at p. 127 ["The Legislature can take over [preparing the ballot label, title, and official ballot summary of a measure] only if it obtains the approval of the electorate to do so prior to placement of the measure on the ballot."].)

Extensive as the Legislature's powers may be, they "must share space with the powers reserved to" other government bodies or officials. (See *Howard Jarvis Taxpayers Ass'n v. Padilla* (2016) 62 Cal.4th 486, 499.) This principle applies regardless of whether the entity is another branch of government (see *ibid.*) or a body expressly created by the Constitution (*Levit*, *supra*, 52 Cal.2d at pp. 461–462 [citing cases]). The dispositive question is, thus, whether the Legislature's action "defeats or materially impairs" the

ability of any such entity to exercise its constitutionally prescribed authority or intrudes upon a "core zone" of its functions. (See *Marine Forests Soc'y v. California Coast Comm'n* (2005) 36 Cal.4th 1, 15.)

Therefore, when the Legislature seeks to act in a manner that limits the authority of a constitutional body to engage its core constitutional functions, this Court may intervene and assert the impermissibility of such conduct.

Recognizing the significant power that the Constitution granted to the Legislature in this area and how the Legislature historically exercised it, the people of California amended the Constitution in 2008 and 2010 to vest redistricting authority exclusively in the Commission. (See Prop. 11, § 3.2 (2008); Prop. 20, § 3.1 (2010).) As amended, California Constitution Article XXI, § 1 provides:

> In the year following the year in which the national census is taken under the direction of Congress at the beginning of each decade, the Citizens Redistricting Commission described in Section 2 shall adjust the boundary lines of the congressional . . . districts (also known as "redistricting") in conformance with the standards and process set forth in Section 2.

The People's decision to amend the State Constitution to confer the duty of redistricting upon the Commission, and take it away from the Legislature, reflects a significant structural and political judgment. Being a fundamentally partisan body, the Legislature could not, according to the People, be trusted to exercise the redistricting power. Accordingly, that power to engage in the redistricting process was removed from the Legislature and placed in the hands of the Commission, which was, in turn, expressly designed to be "independent from legislative influence." (Cal. Const. art. XXI, § 2(c)(1).)

In addition to transferring the power to engage in the redistricting process to the Commission, the People specified that the boundaries of the State's congressional districts must be deliberated and developed in an "open and transparent" manner. (Cal. Const. art. XXI, § 2(b)(1).) Further, in addition to adhering to federal requirements (Cal. Const. art. XXI, § 2(d)(1)–(2)), maps must be drawn in a "geographically contiguous manner" (*id.* § 2(d)(3)) and "[t]he geographic integrity of any city, county, city and county, local neighborhood, or local community of interest shall be respected in a manner that minimizes their division to the extent possible" (*id.* § 2(d)(4)). Importantly, redistricting cannot consider "[t]he place or residence of any incumbent or political candidate" and maps cannot be drawn **"for the purpose of favoring or discriminating against an incumbent, political candidate, or political party."** (*Id.* § 2(e) [emphasis added].) Together, the Constitution's provisions mandate a redistricting process "that excludes career politicians, reflects citizen participation at every level, and is expected to rise above partisanship." (*Vandermost v. Bowen* (2012) 53 Cal.4th 421, 443.)

For example, during the penultimate period of redistricting,[1] the redistricting process included "more than 70 business meetings and 34 public hearings in 32 cities throughout the state." (*Vandermost*, *supra*, 53 Cal.4th at p. 445.) These hearings were scheduled in a manner that made it convenient for "average citizens" to participate, and the public was "regularly allowed" to provide "input and comment." (*Ibid.* [citation omitted].) Educational materials were distributed in seven different languages, and the redistricting process included the consideration "in addition to oral testimony, more than

[1] The Commission's redistricting efforts in 2021 were impacted by the delayed timing of the federal census that occurred because of the global COVID-19 pandemic in 2020. (See *Legislature v. Padilla* (2020) 9 Cal.5th 867, 873.)

2,000 written submissions" and "written comments, input and suggestions from more than 20,000 individuals and groups." (*Id.* at pp. 445–446.) Before draft maps were issued, the redistricting process included twenty-three "public input hearings," and after draft maps were released there was a five-day review period followed by an additional eleven hearings "to collect reactions to and comments concerning those draft maps." (*Ibid.*) "[P]ublic meetings were live-streamed, captured on video, and placed on the Commission's Web site for public viewing." (*Ibid.* [internal quotation marks omitted].) Every document created in the redistricting process was posted on the internet. (*Ibid*.)

The redistricting process reflected in AB 604, by contrast, was conducted in secret, by unknown persons, and without any public notice, input, submissions, or hearings, in violation of the constitutional requirements the People enacted in 2008 and 2010.

The primary purpose of transferring power to the Commission was the avoidance of self-interested and partisan considerations, which characterize the redistricting process when controlled by the Legislature. (Prop. 11, § 2(b) ["Politicians draw districts that serve their interests, not those of our communities."]; Prop. 20, § 2(a) ["Allowing politicians to draw [Congressional] districts, to make them safe for incumbents, or to tailor the districts for the election of themselves or their friends, or to bar the districts to the election of their adversaries, is a serious abuse that harms voters."].)

The Legislature thus violated the clear text and purpose of Article XXI, §§ 1, 2 when it engaged in the redistricting process, and did so without complying with the Constitution's redistricting requirements, including secretly developing new congressional district maps without public input and redistricting solely for one party's advantage. Indeed, the redistricting proponents have been unequivocal in proclaiming that the express purpose of their redistricting effort has been to redraw congressional boundaries to

benefit Democrats over Republicans (see Maya C. Miller & Jeanne Kuang, *California Lawmakers Are Voting on Gavin Newsom's Gerrymandering Plan. Here's the Latest*, CalMatters, (Aug. 21, 2025) [available at: https://calmatters.org/politics/2025/08/california-redistricting-vote/]), and, reportedly, the effort to use the redistricting process to increase the number of congressmembers from the Democratic Party was led by California's Democratic Party congressional delegation. (Melanie Mason, *et al.*, *How California Bluffed Its Way into a Redistricting War with Trump,* Politico (Aug. 23, 2025) [available at https://www.msn.com/en-us/news/politics/how-california-bluffed-its-way-into-a-redistricting-war-with-trump/ar-AA1L5cL2?ocid=BingNewsSerp].)

Further, the district boundaries defined in AB 604 do not maintain the geographic integrity of areas across the State, in violation of Article XXI, sec. 2(d)(4). (See Decl. of Trende at ¶ 20). Sean Trende's expert opinion is that Congressional Districts 2, 9, 30, 40, and 47 are no longer functionally contiguous. He also highlights numerous occasions where the new maps disrupted various communities of interest that had been preserved in the prior independent citizens redistricting commission's maps. (See Decl. of Trende at ¶ 26).

AB 604 is thus invalid because when the Legislature engaged in its redistricting process, as now, the text of the Constitution still limited the authority to engage in the redistricting process to the Commission and it imposed requirements for that process that the Legislature flagrantly violated, rendering the Commissions redistricting, and AB 604, unconstitutional. (See *Carmel Valley Fire Protection Dist.*, *supra*, 25 Cal.4th 287 at p. 304.) The most egregious violation of those requirements by AB 604 and the maps it creates is their flouting of Article XXI, § 2 of our State Constitution by "discriminat[ing] against a political party." (See Decl. of Trende at ¶ 15-18). Thus, even if the Legislature had possessed the authority

to engage in a redistricting process, the measure must be enjoined because the Legislature's maps were developed pursuant to a redistricting process that violated key constitutional requirements for redistricting.

D. The Boundaries of California's Congressional Maps May Only Be Drawn Once Per Decade

Even if the Legislature or the voters have or are given the authority to engage in a map-drawing process, a power that the Commission currently holds, the ballot measure is unconstitutional for a separate and independent reason: Our State Constitution unambiguously permits redistricting only once per decade. Redistricting is an inherently destabilizing event that results in substantial political and social upheaval, as well as costs. This ballot measure is expected to trigger hundreds of millions of dollars in costs. To combat this, the Constitution guarantees that redistricting will only occur once per decade. The Legislature's present attempt to redraw congressional districts in 2025 defies that guarantee and must be enjoined for that reason.

Article XXI, § 1 provides, in relevant part, that redistricting shall only occur "[i]n the year following the year in which the national census is taken under the direction of Congress at the beginning of each decade[.]" This constitutional mandate is clear: Redistricting occurs once, in the year following the federal census, and the resulting districts remain in place until the next decennial cycle.

This Court confirmed the force of the once-per-decade rule in *Legislature v. Deukmejian* over four decades ago. There, the Court "determine[d] the constitutionality of an attempt—novel in the history of this state—to readjust state legislative and congressional district boundaries through the statutory initiative process" between decennial redistricting. (34 Cal.3d at 663.) Proponents of the initiative at issue in that case sought "to create an exception to **the constitutionally mandated and long-established rule** that redistricting may occur only once within the 10-year period

following a federal census." (*Ibid.* [emphasis added].) Note that this long-established rule predated the creation of the Commission and is independent from who engages in redistricting. This Court declined to create such an exception to decennial redistricting for ballot measures, ruling that the special election called for the purpose of mid-decade redistricting by initiative was unconstitutional. (*See id.* at p. 681.)

This Court based its ruling on a determination that the appropriate interpretation of Article XXI, § 1 of the State Constitution rendered impermissible the proponents' efforts to engage in a process of redistricting at any time other than "[i]n the year following the year in which the national census is taken under the direction of Congress at the beginning of each decade[.]" (*Deukmejian*, *supra*, 34 Cal.3d at p. 672 [quoting Cal. Const. art. XXI, § 1].) Ultimately, this Court concluded that "[a] statutory initiative is subject to the same state and federal constitutional limitations as are the Legislature . . . " (*id.* at p. 674 [citing cases]), and "Article XXI . . . is absolute in its prohibitory aspect," with respect to the once-a-decade rule (*ibid.*).

In the years since this Court's decision in *Deukmejian*, California Courts have routinely reiterated its central holding. (See *California Cannabis Coal. v. City of Upland* (2017) 3 Cal.5th 924, 942 [discussing *Deukmejian*'s determination that the Constitution prohibits the Legislature from redistricting more than once per decade and affirming that this principle precludes initiatives that circumvent that legislative limitation]; *California Sch. Bds. Ass'n v. State* (2009) 171 Cal.App.4th 1183, 1207–1208 [same].)

It is abundantly clear from this Court's precedents that Article XXI, § 1 has consistently been interpreted as restricting the use of the redistricting power to a decennial basis. While that Section has been amended in the years since *Deukmejian*, the amendments have done nothing to alter that guarantee, which has been an essential element of redistricting since the California Constitution was adopted in 1879. (Cal. Const. art IV, § 6 (1879) ["The

census taken under the direction of the Congress of the United States . . . shall be the basis of fixing and adjusting the legislative districts, and the Legislature shall, at its first sessions after each census, adjust such districts and re-apportion the representation . . . ."].)

The 2008 amendments created the Commission and provided that the Legislature was to coordinate with the Commission when drawing congressional districts. (See Cal. Const art. XXI, §§ 1(d), 2 (2008). And the 2010 amendments wholly "transferr[ed] the redistricting task to [the Commission]." (*Vandermost*, *supra*, 53 Cal.4th at p. 443.) But neither of these amendments affected the longstanding temporal limits imposed by the State Constitution on the redistricting power, and every substantive provision in force in 1983 remains in force today, except the provision specifying which arm of the government holds the authority to redistrict. (Compare Cal. Const. art. XXI, § 1(a)–(e) (1983), with Cal. Const. art. XXI, §§ 2(d), (d)(1), (d)(3), (f), (d)(4).) In short, who redistricts is a separate issue from when redistricting may occur.

Consequently, this Court should interpret Article XXI, § 1 as imposing the same constraints today as it did in 1983. (See *Glaviano v. Sacramento City Unified Sch. Dist.* (2018) 22 Cal.App.5th 744, 753 ["When legislation has been judicially construed and subsequent statutes on a similar subject use identical or substantially similar language, the usual presumption is that the Legislature intended the same construction, unless a contrary intent clearly appears." [quoting *Ketchum v. Moses* (2001) 24 Cal.4th 1122, 1135]]; *In re Marriage of Amezquita & Archuleta* (2002) 101 Cal.App.4th 1415, 1421 [same]; *People v. Smith* (2022) 75 Cal.App.5th 332, 343 [citing *Moran v. Murtaugh Miller Meyer & Nelson, LLP* (2007) 40 Cal.4th 780, 785 for the same proposition]; *People v. Superior Ct. (San Francisco)* (1946) 168 P.2d 177, 179 ["The statute having been reenacted since 1893 **in substantially the same terms** the construction placed on it prior to its reenactment

continues." [emphasis added], vacated on other grounds, (1947) 29 Cal.2d 754; see also *People v. Nelson* (2011) 200 Cal.App.4th 1083, 1099 ["[I]t is 'ordinarily presumed' that statutory language, once judicially construed, will be given a like interpretation in a latter statute on the same or analogous subject." [quoting *Yeroushalmi v. Miramar Sheraton* (2001) 88 Cal.App.4th 738, 748–749].)

The Legislature cannot take action that contravenes a constitutional provision. (*Consulting Eng'rs & Land Surveyors of Cal., Inc. v. Pro. Eng'rs in Cal. Gov't* (2007) 42 Cal.4th 578, 587 [citing *Cnty. of Fresno v. State* (1991) 53 Cal.3d 482, 493].) The Legislature's enactment of AB 604, even if combined with the approval of the measure by the state's voters, would unconstitutionally inflict a prohibited mid-decade redistricting. Because AB 604 disregards the guarantee of decennial finality enshrined in our State Constitution, AB 604 should be invalidated by this Court and Respondent enjoined from placing ACA 8 on the ballot.

E. AB 604 Is Unconstitutional Because the Legislature Failed to Adhere to the Constitutionally Mandated Waiting Period for New Legislation

i. The Legislature's Failure to Wait 30 Days Before Acting Upon AB 604 Does Not Conform to Our Constitution's Defined Procedures

Irrespective of whether AB 604 violates other constitutional mandates, the Legislature's passage of AB 604 only 4 days after its contents were first introduced renders AB 604 unconstitutional and, consequently, requires that ACA 8 be removed from the November ballot.

California Constitution, Article IV, § 8(a) imposes an unambiguous requirement:

> At regular sessions no bill other than the budget bill may be heard or acted upon by committee or either house until the 31st day after the bill is introduced unless the house dispenses with

this requirement by rollcall vote entered in the journal, three fourths of the membership concurring.

Constitutional provisions are to be construed like statutes. (See *Silicon Valley Taxpayers' Ass'n*, *supra*, 44 Cal.4th at p. 448; *Bowens v. Superior Ct. (Alameda)* (1991) 1 Cal.4th 36, 46; *Lungren v. Deukmejian* (1988) 45 Cal.3d 727, 735 [citing *Stanton v. Panish* (1980) 28 Cal.3d 107, 115]; *Bd. of Supervisors v. Lonergan* (1980) 27 Cal.3d 855, 863; *Amador Valley Joint Union High Sch. Dist. v. State Bd. of Equalization* (1978) 22 Cal.3d 208, 244–245.) Thus, when interpreting constitutional provisions, "[w]ell-established rules require [this Court] to . . . ascertain the intent of the enacting legislative body so that [it] may adopt the construction that best effectuates the purpose of the law." (*Hassan v. Mercy Am. River Hosp.* (2003) 31 Cal.4th 709, 715 [citing *Esberg v. Union Oil Co.* (2002) 28 Cal.4th 262, 268]; *Klein v. United States* (2010) 50 Cal.4th 68, 77 [citing *Hassan*]; *Chavez v. City of Los Angeles* (2010) 47 Cal.4th 970, 986 [same].) Although this Court must first begin with the text of a provision (*Hassan*, *supra*, 31 Cal.4th at p. 715), "[l]iteral construction [of the provision] should not prevail if it is contrary to the legislative intent apparent in the statute" (*Lungren*, *supra*, 45 Cal.3d at p. 735), and this Court should avoid "judicial construction that renders part of [a provision] 'meaningless or inoperative.' " (*Hassan*, *supra*, 31 Cal.4th at pp. 715–716 [quoting *Mfrs. Life Ins. Co. v. Superior Ct. (San Francisco)* (1995) 10 Cal.4th 257, 274].)

The plain language of Article IV, § 8(a) mandates that neither house of the Legislature may hear or act upon a "bill" until the 31st day after its introduction. This waiting period serves two distinct purposes.

First, the period exists to "giv[e] the interested public time to review the [legislative] proposal." (*Mission Hosp. Reg. Med. Ctr. v. Shewry* (2008) 168 Cal.App.4th 460, 492.) Were either house to introduce and act upon a measure on the same day or within just a few days, members of the public

would be deprived of any meaningful time to review the measure's contents, contact their representatives, and voice their approval or disagreement. That is why, in 1962, a proposal to shorten this period from 30 days to 20 days was rejected. Members of the public indicated that the full 30 days was required to provide them with sufficient time to "review legislation" and, in the case of public-facing organizations, notify their members "of the pendency of measures in which they are interested." (Cal. Const. Rev. Comm'n, Constitution Revision History & Perspective 29 (1996) [available at: https://www.californiacityfinance.com/CCRChistory.pdf].)

Second, the provision serves the practical purpose that legislators themselves must have adequate time to review a proposed measure before they are called upon to speak intelligently about its contents and implications, as well as vote on it.

Thus, Article IV, § 8(a) affords the public and legislators sufficient time to evaluate proposed legislation, and any legislation passed without permitting such a period of public review is unconstitutional.

Several of the Petitioners previously challenged the Legislature's action on AB 604 on the grounds that the Legislature's introduction and referral of the redistricting scheme on August 18, 2025, violated this provision. (Emergency Pet. for Writ of Mandate or Other Extraordinary or Immediate Relief to Stay Legislative Action with Respect to AB 604 and SB 280, as Amended on August 18, 2025, S292490 (Cal. Aug. 18, 2025).) This Court denied that petition, concluding that those Petitioners had "failed to meet their burden of establishing a basis for relief **at this time** under California Constitution article IV, section 8." (Disposition, S292490 (Cal. Aug. 29, 2025) [emphasis added].)

For the purposes of this challenge, there are only two potential time periods to consider: the time period after legislation is introduced, when it is prematurely acted upon by the Legislature but has not yet been

signed/enrolled—which is the time period this Court held was premature, and the time period after legislation has been introduced, prematurely acted upon, and signed—which is the time in which this Petition has been filed. Accordingly, this challenge must now be ripe for the Court's consideration.

The Legislature's decision to refer the new legislation in AB 604 to committee and to debate it and pass it before the expiration of the Constitutionally required 30-day public review period constitutes a direct violation of the prohibition in Article IV, § 8(a).

Although AB 604 was formally introduced on February 13, 2025 (see Exhibit 2), amending AB 604 on August 18, 2025, by removing all of its text and replacing that language *in toto* with provisions that define a new constitutional map constitutes the introduction of new legislation subject to the 30-day rule in Article IV, § 8(a). California Courts have not addressed whether this tactic, known as "gut and amend," satisfies Article IV, § 8(a). Other states have been clear that the state legislature may not employ such a strategy to avoid constitutional obligations. (*League of Women Voters of Honolulu v. Hawaii* (Haw. 2021) 499 P.2d 382, 406; *Washington v. Dep't of Pub. Welfare* (Pa. 2018) 188 A.3d 1135, 1151–1152; see *Bevin v. Kentucky ex rel. Beshear* (Ky. 2018) 563 S.W.3d 74, 92–94.) But more importantly, to condone this tactic would mean interpreting Article IV, § 8(a)'s 30-day waiting period as absurdly limiting the People's right to know a mere bill number exists, rendering the 30-day requirement meaningless and insignificant. Such an interpretation thwarting the purpose of the provision is belied by the Constitution only allowing the Legislature to bypass the rule if fully three quarters of the Legislators vote to make an exception. Such an interpretation is squarely foreclosed by this Court's precedent. (See *Hassan*, *supra*, 31 Cal.4th at pp. 715–716.)

Another weak argument easily dispatched is that the Legislature need only comply with the 72-hour rule in Article IV, § 8(b)(2) of our State

Constitution. The 30-day rule focuses on the beginning of the legislative process and protects the public and legislators by permitting them a period of time to review the original draft of proposed legislation and consider their positions before it can be debated and amended. The 72-hour rule, by contrast, focuses on the end of the legislative process and requires that the final text of a bill be disclosed at least 72 hours before it is passed, ensuring legislators have time to see the text they will be voting upon. (Cal. Const. art. IV, § 8(b)(2) ["No bill may be passed or ultimately become a statute unless the bill with any amendments has been printed, distributed to the members, and published on the Internet, **in its final form**, for at least 72 hours before the vote . . . ." [emphasis added]].) There is no basis in the text of the Constitution, the canons of interpretation, the precedent of this Court, or logic to interpret the 72-hour rule as somehow superseding or making redundant the 30-day rule. They are prescribed in separate provisions and in every respect apply to different documents (original versus final proposed legislation) for different purposes.

Article IV, § 8(a), appropriately construed, would have required the Legislature to wait until September 18, 2025, before taking any action with respect to AB 604. Because the Legislature passed AB 604 on August 21, 2025, well before that date, AB 604 was enacted in conflict with Article IV, § 8(a). As such, the act itself is unconstitutional. (See *Hotel Emps. & Restaurant Emps. Int'l Union v. Davis* (1999) 21 Cal.4th 585, 602 ["A statute inconsistent with the California Constitution is, of course, void."]; *People v. Navarro* (1972) 7 Cal.3d 248, 260 ["Wherever statutes conflict with constitutional provisions, the latter must prevail."].)

ii. The Enrolled Bill Rule Should Not Preclude Judicial Review of AB 604

Nearly a century ago, this Court articulated its view that "a statute, properly enrolled and authenticated, conclusively establishes, not only the

contents of the law, but the due performance of all steps requisite to its passage by the Legislature." (*Taylor v. Cole* (1927) 201 Cal. 327, 332.) But this principle is not absolute. Traditionally, the Enrolled Bill Rule may preclude judicial review of enrolled legislation, but it may only do so only "when an act of the Legislature is valid on its face . . . ." (*People ex rel. Levin v. Cnty. of Santa Clara* (1951) 37 Cal.2d 335, 337.) Thus, this Court has held that if it appears from the face of an enrolled bill that the act was adopted in violation of a constitutional mandate, this Court is permitted to invalidate the act on the basis of that violation. (See *People ex rel. Conklin v. City of San Buenaventura* (1931) 213 Cal. 637, 642, overruled on other grounds by *Costa*, *supra*, 37 Cal.4th at p. 1014, fn. 20 [Where it "appears on the face of [an] Assembly concurrent resolution . . . that one of the essential steps required by the Constitution . . . was not taken . . . we are compelled to hold that the [act], not having been legally adopted, its purported approval by the Legislature amounts to nothing."]; *Santa Clara Cnty. v. Superior Ct. (Santa Clara)* (1949) 33 Cal.2d 552, 558 [approving of this Court's holding in *City of San Buenaventura* that the constitutional sufficiency of a legislative act "may be tested by some appropriate proceeding"].)

AB 604 was first introduced on February 13, 2025, and functioned to repeal an "obsolete" provision that required "county elections officials to update a voter's registration record if change-of-address information indicates the voter has moved to a new residence address in California." (Exhibit 2, at 1.) On August 18, 2025, the original text of AB 604 was deleted and replaced with the wholly different text and subject of AB 604 that is at issue here, regarding the boundaries of congressional districts through 2030 (See generally Exhibit 3), and on August 21, 2025, the bill was passed by the Legislature.

As discussed above, well-settled principles of constitutional construction establish that this practice violated Article IV, § 8(a) and

deprived the people of California of their constitutional right to 30 days' notice of new legislation. Those principles would require that this Court interpret § 8(a) as requiring that legislation be considered a newly introduced "bill" when a prior bill is wholly amended to address an entirely different subject, and deem the date of that legislation's introduction to be the day of the "gut and amend" amendment. None of the requisite facts demonstrating a violation of Article IV, § 8(a) are subject to dispute or inconsistent with the Legislature's own official records.

This Court's application of the Enrolled Bill Rule under these circumstances to preclude review of the Legislature's aggressive violation of Article IV, § 8(a) raises the question as to whether Article IV, § 8(a) is effectively a dead letter. No bill gutted and amended like AB 604 would ever be subject to review for compliance with Article IV, § 8(a). (This Court also concluded in an order issued on August 20, 2025, that a writ challenging AB 604 for this same reason before enrollment was premature.)

The Enrolled Bill Rule, holding that the enrollment of legislation creates presumption that legislative procedures were followed, is a judicial doctrine with English roots that predates the U.S. and California constitutions that has been invoked to avoid litigation disputing whether a legislature followed its procedures to enact legislation, such as whether it published the correct statutory text or miscounted its votes. (*United States v. Thomas* (7th Cir. 1986) 788 F.2d 1250, 1253, cert. denied, (1986) 479 U.S. 853 [citing *Field v. Clark* (1892) 143 U.S. 649 ["If a legislative document is authenticated in regular form by the appropriate officials, the court treats that document as properly adopted."]]; *United States v. Farmer* (2d Cir. 2009) 583 F.3d 131, 151–152 [enrollment as a conclusive record of a statute]. The longstanding rule in California, as well as less than half the states, is that this presumption is conclusive. (See *Taylor v. Legislature* (1927) 201 Cal. 327, 332*;* I C. Sands, Sutherland Statutory Construction § 15.03 et seq. (4th ed.

1972); 82 C.J.S. Statutes § 83 (1953); 72 Am.Jur.2d Statutes § 90 (1974); and 4 A.L.R.2d 978 (1949)); Chris M. Micheli, *Challenging the Enrolled Bill Rule: A Proposed Middle Ground for California,* National Law Review (Jan. 12, 2022) [available at: https://natlawreview.com/article/challenging-enrolled-bill-rule-proposed-middle-ground-california].) However, other courts, including those in Pennsylvania and Kentucky, have held that the presumption is rebuttable. (See *Consumer Party of Pa. v. Pennsylvania,* 507 A.2d 323 (Pa. 1986); *D&W Auto Supply v. Dep't of Revenue* (Ky. 1980) 602 S.W.2d 420.)

There are sound grounds for distinguishing the application of the rule in this case from the general rule. While, under the separation of powers doctrine (Cal. Const. Art. III, § 3), this Court is rightly reluctant to interfere in matters of the Legislature's compliance with its *internal* rules and compliance with mere procedure after a bill is enrolled, the Court also has the authority if not the duty to protect the rights of the people by enforcing rules in the Constitution that, like Article IV, § 8(a), limit the power of the Legislature to protect the people. That is, in a situation where the Constitution itself protects the people by imposing a limit on the Legislature's power, as in the 30-day publication requirement in Article IV, § 8(a), the Court is not unduly interfering in the Legislature's *internal* affairs. Particularly where, as here, the Legislature's violation of the state Constitution is evident from its own official published records, an alleged violation is justiciable without infringing upon the prerogatives of the Legislature.

Accordingly, we urge this Court to expand the exception to the Enrolled Bill Rule for constitutional violations on the face of a bill to the circumstances presented here, where the Legislature's own undisputed records—showing the wholesale gutting and amending of a prior bill to introduce significant new legislation just days before passage and enrollment

establish the Legislature's clear violation of Article IV, § 8(a) in derogation of the people's rights under the California Constitution to 30 days' notice of new legislation.

* * * *

Because the Legislature took action on a bill within 30 days of its introduction, AB 604 was enacted in violation of Article IV, § 8(a) and is invalid. The Court should therefore enjoin the Secretary from placing ACA 8 on the ballot.

III. CONCLUSION

A ballot measure that would give effect to an unconstitutional statute is itself unconstitutional and may not be submitted to the voters. (*See Weber*, *supra*, 16 Cal.5th at p. 252.) Allowing ACA 8 onto the ballot would not only pose to the voters an illegal dual-subject question; it would condone an unlawful redistricting effort by the Legislature. The Legislature has engaged in a redistricting process before the voters have transferred redistricting power back to it and, while doing so, violated several fundamental constitutional restrictions on redistricting efforts. By engaging in this unlawful effort in the middle of the decade, the Legislature is also unlawfully subjecting Californians to precisely the burden, tumult, and disruption that the Constitution was amended to prohibit more than once every ten years.

For the reasons stated above, a writ of mandate requiring Respondent to refrain from taking any steps to place ACA 8 on the November 4, 2025, ballot should issue as prayed for, together with such other and further relief this Court deems just and proper.

Dated: August 25, 2025

Respectfully submitted,

Dhillon Law Group Inc.

By: /s/*Michael A. Columbo*

Michael A. Columbo
Mark P. Meuser
Jesse Franklin-Murdock
Attorneys for Petitioners

Ex. 238A

← **Post**

Assemblyman David Tangipa
@AsmTangipa

Me: "Were these maps made with protections for CA Voters?"

Democrats: "It's a partisan gerrymander."

11:23 PM · Aug 19, 2025 · **11.4K** Views

19 84 263 17

Tangipa v. Newsom
DX238A
2:25-cv-10616-JLSWLH-KKL
DX238A-0001

Ex. 240B

Multimedia exhibit available at
https://app.box.com/s/lmpsnbcg027ijtqizn0nvlluymigvsdc

Ex. 242

davidjtangipa Follow
California

davidjtangipa 12w
🚨 One of the map's OWN authors admitted: "this is partisan gerrymandering." They don't care about communities of interest—only power.

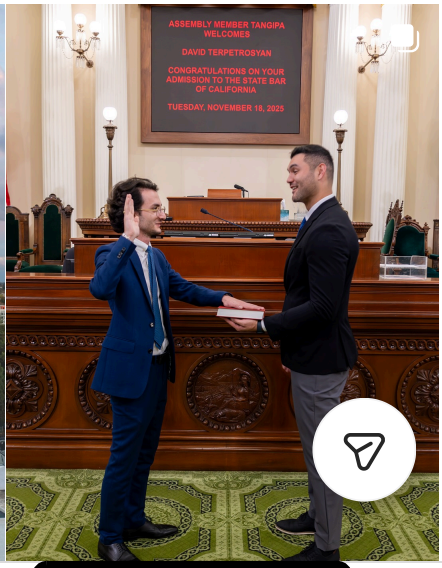
We can stop it, but only if YOU step up. Volunteer today & help us with the NO on Prop 50.

👉 Sign up below ⬇️
See translation

399 likes
August 28

Add a comment...

More posts from davidjtangipa



Tangipa v. Newsom
DX242
2:25-cv-10616-JLSWLH-KKL

Ex. 243B

Multimedia exhibit available at
https://app.box.com/s/lmpsnbcg027ijtqizn0nvlluymigvsdc

Ex. 244

VOTE NO ON PROP 50 DONATE MAKE A PLAN TO VOTE VOLUNTEER PRIVACY POLICY CONTACT

HELP ASSEMBLYMAN DAVID TANGIPA

DEFEAT PROP 50

VOTE NO
PROP 50
NO TO NEWSOM
NO TO RIGGED ELECTIONS

HOW WE GOT HERE

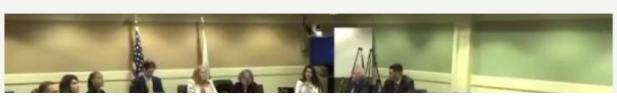
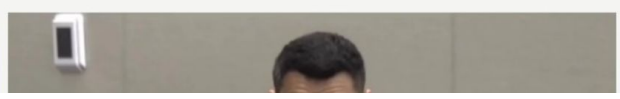
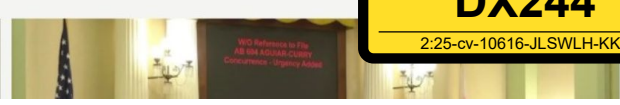
For years, Sacramento Democrats, led by Governor Gavin Newsom, have prioritized **political power** over the will of the people.

In August, they rammed through the biggest **power grab** yet. **Prop 50**. A unilateral decision to redraw Congressional maps, eliminate five Republican districts, & strengthen Democrat held seats.

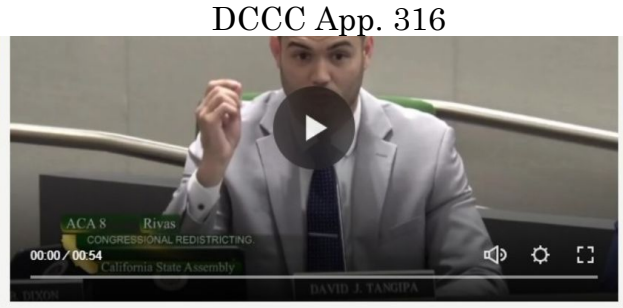
Under Newsom's watch, the Democratic supermajority rammed through this mid-decade redistricting scheme in a matter of days, bypassing meaningful public input and ignoring the independent redistricting process that Californians fought to establish.

In the Elections Committee, I was shouted down, laughed at, and ultimately silenced by the Chair. Why? Simply for asking these basic questions:

- Who drew the maps?
- How much will this cost taxpayers?
- How does this help Valley families?

Tangipa v. Newsom
DX244
2:25-cv-10616-JLSWLH-KKL



WHATS AT STAKE FOR THE VALLEY?

PROP 50 IS A POWER GRAB. PUT SIMPLY, IF THIS INITIATIVE PASSES ON NOVEMBER 4TH, WE RISK LOSING CONGRESSMAN VALADAO AND NOT BEING ABLE TO RETAKE CD-13 OR CD-21; TWO OF THE BEST PICKUP OPTIONS FOR REPUBLICANS IN THE COUNTRY.

LET'S LOOK AT THE NUMBERS.

CD-22:

CD-22	OLD	NEW
REGISTRATION	D+11	D+16
TRUMP/HARRIS	TRUMP+6	TRUMP+1
DAHLE/NEWSOM	DAHLE+4	NEWSOM+1
RECALL	PASS+1	FAIL+5
TRUMP/BIDEN:	BIDEN+13	BIDEN+18

CD-21

CD-21	OLD	NEW
REGISTRATION	D+13	D+14
TRUMP/HARRIS	HARRIS +3	HARRIS+6
DAHLE/NEWSOM	NEWSOM+1	NEWSOM+3
RECALL	FAIL+9	FAIL+11
TRUMP/BIDEN:	BIDEN+20	BIDEN+21

CD-13

CD-13	OLD	NEW
REGISTRATION	D+10	D+16
TRUMP/HARRIS	TRUMP+5	HARRIS+1
DAHLE/NEWSOM	DAHLE+8	EVEN
RECALL	PASS+2	FAIL+5
TRUMP/BIDEN:	BIDEN+11	BIDEN+18

IT WON'T END HERE

HISTORY'S OLDEST LESSON IS WHEN POWER IS TAKEN BY THE GOVERNMENT, IT IS **NEVER RETURNED.** POWER CORRUPTS. AND ABSOLUTE POWER CORRUPTS ABSOLUTELY.

MARK MY WORDS. IF PROP 50 PASSES AND CONTROL OF REDISTRICTING IS HELD BY THE LEGISLATURE, DEMOCRATS WILL COME BACK FOR THE REMAINING REPUBLICANS IN CONGRESS AND WILL THEN SET THEIR SIGHTS ON ELIMINATING THE COMMISSION'S AUTHORITY OVER LEGISLATIVE MAPS.

GOVERNOR NEWSOM AND THE LEGISLATURE WANT ABSOLUTE CONTROL AND A PERMANENT SUPER-MAJORITY.

WHAT CAN WE DO?

I'm calling on **every Californian** who cares about fair elections, balanced representation, and a check against Sacramento Democrats & Governor Newsom to sign up today to **defeat Prop 50.**

Its gameday. Here's how you can do your part. Every bit counts.

KNOCK 50 DOORS

CALL 50 VOTERS

GIVE $50

PUT A SIGN IN YOUR YARD

POST TO SOCIAL MEDIA

GET INVOLVED

KNOCK 50 DOORS

GIVE $50

CALL 50 VOTERS

Ex. 255

To Whom It May Concern,

We are pleased to submit this proposed congressional map to the California legislature for their consideration. We strongly believe that this map serves the best interest of California voters, while also attempting to push back against the corrupt scheme occurring in Texas and other Republican-majority states where Republicans – doing the bidding of their DC party bosses – are considering adopting a clearly racially gerrymandered, partisan map at the expense of their voters.

Our proposed map was created using traditional redistricting criteria, consistent with guidelines laid out by the California's Citizen Redistricting Commission. It allows for more compact districts than in the current Commission-drawn map, keeps more communities and neighborhoods together, splits fewer cities, and makes minimal disruptions to the Commission-drawn map so as to impact as few residents as possible. This is a striking contrast from Texas' proposed gerrymander which redrew all but one of their 38 congressional districts to minimize the state's growing minority voting strength.

Democrats cannot sit idly by while Texas Republicans and their DC party bosses attempt to steal congressional seats and rig the election in their favor, well before any votes have been cast. Unlike what Texas Republicans are attempting to do in letting politicians choose their own voters, we believe that voters should be able to decide who represents them.

Sincerely,

Julie Merz
Executive Director, DCCC

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Ex. 296

Tangipa v. Newsom
DX296
2:25-cv-10616-JLSWLH-KKL

DX296-0001

Ex. 306B

Multimedia exhibit available at
https://app.box.com/s/lmpsnbcg027ijtqizn0nvlluymigvsdc

Ex. 366

Home
Explore
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Premium
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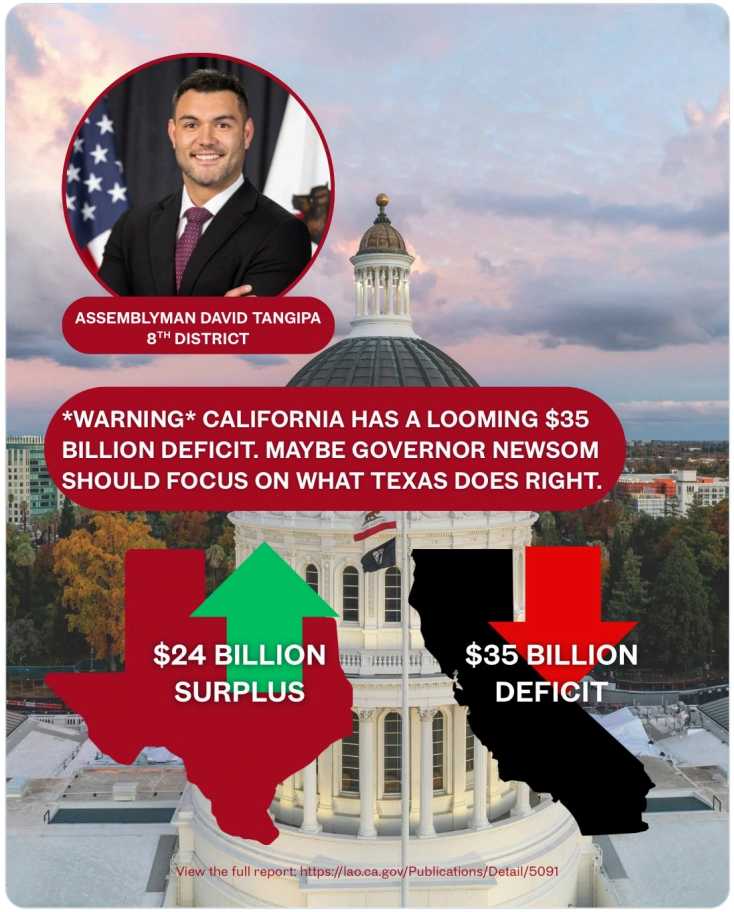
More
Post

David Tangipa
@DavidTangipa

Prop 50 cost $300M, I warned we didn't have the money, & they cut my mic. Partisan gain mattered more than Californians, & now we'll pay the price

Post Reply

When d[illegible]ome, remember: "what about Texas" mattered m[illegible]n[illegible] you. Other states have surpluses. California has deficits.



7:06 PM · Nov 19, 2025 · **17.7K** Views

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Tangipa v. Newsom
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2:25-cv-10616-JLSWLH-KKL

Ex. 367

← **Post**

David Tangipa
@DavidTangipa

🚨BREAKING: The DOJ has joined our lawsuit against Gov. Newsom!

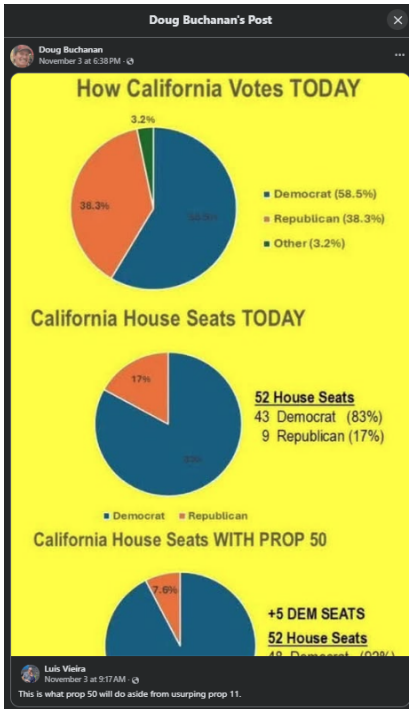
We promised to fight this partisan gerrymandering every step of the way and now the DOJ is standing with us to stop this power grab.

From kcra.com

12:07 PM · Nov 13, 2025 · **26.7K** Views

Tangipa v. Newsom
DX367
2:25-cv-10616-JLSWLH-KKL

Ex. 399



Tangipa v. Newsom
DX399
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Ex. 401A

Planet Depos
We Make It Happen™

Transcript of David Tangipa

Date: December 5, 2025
Case: Tangipa, et al. -v- Newsom, et al.

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Phone: 888.433.3767
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Tangipa v. Newsom
DX401A
2:25-cv-10616-JLSWLH-KKL

WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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A Yeah. I was referring to a poll that they had talked about.
Q Which mentioned partisan gerrymandering?
A Yes.
Q Did you bring up race on this podcast?
A On the podcast, I believe I did. I believe we talked about it.
Q In what context?
A That is something -- it's been a little bit since that one, but I do believe we talked about however the whole process went on.
ATTORNEY DODGE: Can we bring up Tab 9?
(Reporter clarification.)
THE AV TECHNICIAN: And just to be clear, before we bring up Tab 9, would you like the video marked as Tab 8, marked as Exhibit 8?
ATTORNEY DODGE: I think that would be best.
THE AV TECHNICIAN: Okay.
ATTORNEY DODGE: Thank you for asking.
(Tangipa Deposition Exhibit 8 marked for identification and attached to the transcript.)
ATTORNEY DODGE: And when -- when you're done with that, if you could bring up Tab 9 and label it Exhibit 9? Thank you.
(Tangipa Deposition Exhibit 9 marked for

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identification and attached to the transcript.)
BY ATTORNEY DODGE:
Q Do you recognize this?
A Yes. I believe so.
Q Well, let me -- let me ask it a slightly different way: Do you recall doing an interview with AgNet West Radio Network in September of this year?
A I -- I might have done a couple in September, but I -- I do believe, I might have done maybe a couple with them.
Q It looks like this one is September 1st.
Does that generally sound like when you might have done an interview with them?
A Yes.
Q And do you remember being asked during the interview to describe Proposition 50?
A Slightly, yes.
ATTORNEY DODGE: All right. Can we play Tab 10, and label that Exhibit 10, starting at the 8:28 mark, and ending around the 9:20 mark?
(Tangipa Deposition Exhibit 10 marked for identification and attached to the transcript.)
ATTORNEY DODGE: I, at least, am not hearing the audio. Oh, it looks to be off.

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Can we pause, and go back to the 8:20 mark or so, and then play it through the 9:20 mark?
(Exhibit 10 audio played.)
ATTORNEY DODGE: That's -- that's good right there.
BY ATTORNEY DODGE:
Q So this part of this interview starts with the host asking you to explain to everybody what Proposition 50 is; yes?
A Yes.
Q And you respond first by saying Proposition 50 is Governor Newsom's gerrymandered maps that are going to be on the ballot, that they are asking people to approve so they can strip away the Central Valley votes and some of the other votes, and that way we can get areas like Redding, now in with Northern San Francisco, so they can get rid of the congressmen in the area that's conservative.
Did I more or less get that right?
A Yes.
Q And in that portion, you say: Get rid of the congressmen in that area that's conservative; yes?
A Yes.
Q And who are you referring to there?

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A I believe I'm referring to Congressman Doug LaMalfa.
Q And he's a Republican; yes?
A Yes.
Q And so your answer to explain to everybody what Proposition 50 is, in part involved telling them that it would get rid of Congressman LaMalfa; yes?
A Yes. It had to deal with about stripping the voices away of rural California, and it utilized their -- they utilized their means --
Q You've -- you've answered my -- you've answered my question.
And you also said that Proposition 50 would get rid of Congressman Kevin Kiley; yes?
A Yes.
Q And Congressman Kiley is a Republican too; yes?
A Yes.
Q And you brought back up Senator Gonzalez's statement that Proposition 50 was a partisan gerrymander; yes?
A Yes.
Q Why did you bring up her statement again?
A So that way people could see how their voices

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were being stripped through the games that were being played.

Q And then later on you say they want to send more of their representatives back to Washington. Did I get that right?

A I believe so. I don't know if we listened to that part, but probably.

Q Well, I'll represent to you that it's in the audio file in that exhibit, and it sounds like you agree with me that you would have said that; yes?

A Yeah.

Q And they want to send more of their representatives back to Washington. The "they" there is California Democrats, right?

A Yes.

Q So moving on from that interview, I want to ask: During the campaign season for Proposition 50, did you ever make any social media posts that said Proposition 50 benefitted Latinos?

A Did I make any social media post that specifically said that?

Q Yes.

A I don't believe I made any social media posts that specifically said that.

Q Did you make any social media posts during

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the campaign about Proposition 50 that used the term Voting Rights Act or VRA?

A I'm not sure. I don't -- I don't think I did. But I actually have quite a few posts out there about the Voter Rights Act.

Q During the campaign?

A I'm not sure. I just know that there were some that I had referred to.

Q Well, let me ask you this: Did you make social media posts after the filing of this lawsuit that said Proposition 50 was about race?

A I had made some, yes.

Q Did you make social media posts before this lawsuit that said Proposition 50 was about race?

A Well, I was -- the questions that I had asked about protecting communities of interest, that was a social media post about race. Yes.

Q What's your understanding of the term community of interest?

A As defined under the -- it's in the legislation, communities of interest having to deal with race, sex, geographical lines.

And not only that, I often talk about how -- in a lot of those posts, how I'm the first Polynesian ever elected to the Legislature, and

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how -- why my District, which is a very white district, voted the most minority in the State of California. I had talked about that often, in both the radio, on the dais.

Actually, while questioning one of the Independent Redistricting Commissioners, I even told her that it is an honor to be the first Polynesian ever elected in a district that is: One, very white, but also, to be a part of the process when it came to the Redistricting Committee -- or, Commission, when they were drawing the lines prior.

Q You mentioned earlier that you would go to the Independent Redistricting Commission hearings, right?

A I would call in.

Q You would listen to their proceedings?

A Yes.

Q Did you gain familiarity with redistricting terms and principles while doing that?

A Yes, somewhat.

Q Would there be -- sorry. Finish your answer.

A Well, I was going to say, as we talked about in the beginning, acronyms like, LULAC. They had CVAPs, all that stuff. So, yes. I'm familiar.

Q But you know the term CVAP, for example?

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A Yes. But I couldn't tell you what CVAP stands for. But I understand what it means.

Q Would they ever talk about gerrymandering during those hearings?

A On the Independent Redistricting Commission?

Q Yes.

A I think maybe people who called in, sometimes the terms, but I'm not -- I'm not too familiar.

Q So going back to your social media posts, you agreed with me that since the filing of this lawsuit you've made social media posts that use the word race or racial; yes?

A During the entire process, I had talked about race.

Q Well, let me -- let me step back, and I'm going to ask very specific questions.

Since the filing of this lawsuit, you have made social media posts that use the words race or racial; yes?

A I believe so. I do -- actually, I post a lot, so I believe so. I do believe I've used that term, VRA. A couple others.

Q Do you recall tweeting yesterday the following, in response to a tweet from Governor Newsom Press Office, quote: You used race to

Ex. 438

Transcript of Scott Winn

Date: December 12, 2025
Case: Tangipa, et al. -v- Newsom, et al.

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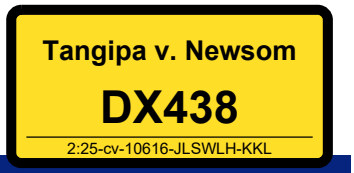

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A. Uh-huh.
Q. What is your understanding of who she is referring to when she says "they" or "their?"
A. The governor and the legislature.
Q. And what is it they are not hiding?
A. That they are trying to redistrict to eliminate five Republican congressional seats.
Q. All right.
ATTORNEY DODGE: Could we pull up tab three and label it Winn 4, please?
TECHNICIAN: Stand by.
(Exhibit 4 marked for identification)
ATTORNEY DODGE: And this is a video. And we'll watch the whole thing.
TECHNICIAN: Playing now.
[Video played.]
BY ATTORNEY DODGE:
Q. This advertisement was sponsored by the California Republican Party. Right?
A. I'm sorry, Chris. I couldn't hear what you said. Can you --
Q. No worries. I said this advertisement was sponsored by the -- can you all hear me? Let's go off the record briefly.
A. Okay. That's -- I can hear you now.

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Q. Strike that. No need to go off the record. Great. Okay. I'll ask it again.
Were you able to hear the advertisement?
A. Yes.
Q. That advertisement was sponsored by the California Republican Party. Right?
A. Yes.
Q. And that advertisement was consistent with how the California Republican Party was trying to persuade voters -- or at least Republican voters, to vote against Prop 50. Right?
A. Yes.
Q. The first line of the video says something to the effect of, California has a plan. Redraw the map. Rig the rules. Paint California -- you know, I don't actually think it did say California. Strike that.
The beginning of the video says that there is a map to redraw the map; rig the rules; paint California blue. Did I more or less get that right?
A. Yes.
Q. And blue there is in reference to the Democratic Party. Right?
A. Yes.
Q. And what did the California Republican

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Party mean to convey by saying that Governor Newsom was trying to paint California blue?
A. That he was trying to eliminate five congressional districts of the nine.
Q. And when you say "of the nine," you are referring to the nine congressional seats presently held by the Republican Party in California. Right?
A. Yes.
Q. And the ad was meant to highlight that if enacted, Proposition 50 would likely lead to the loss of five of those seats?
A. Yes.
Q. And the ad subsequently says:
"Prop 50 gives Gavin Newsom the power to rig the elections in California, giving democrats more seats in Congress."
Did I get that about right?
A. Yes.
Q. And that was consistent with what the California Republican Party understood Proposition 50 to be -- Proposition 50 to be driving towards?
A. Yes.
Q. Did the California Republican Party sponsor any television or radio advertisements that

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called Proposition 50 a racial gerrymander?
A. We did not.
ATTORNEY DODGE: Can we call up tab 11 and label it Winn 5, I think? Correct me if I'm wrong on that.
TECHNICIAN: That's correct, counsel. And yes. Stand by.
(Exhibit 5 marked for identification)
TECHNICIAN: Exhibit 5 is on the screen.
BY ATTORNEY DODGE:
Q. Mr. Winn, I will represent to you that this is a compilation of documents produced by the California Republican Party in this litigation, in response to a discovery request. If we could scroll down to the first page, or the next page?
Are you familiar with this image?
A. Yes.
Q. Can you tell me, sort of generally what it is?
A. It was a MMS text message, essentially sent to Republican voters, asking them to vote no on Prop 50.
Q. And it says "Stop Newsom's Power Grab." Right?
A. Uh-huh.

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Q. And the power grab also is referring to the elimination of five Republican held seats and the increase of five seats for democrats. Fair?
A. Yes.
Q. Okay. So this is referring to the -- a political power grab. Fair?
A. Yes.
Q. And there is some text underneath the image. That would have been sent to recipients in the text?
A. I'm sorry. Say that again?
Q. Yeah. This text below the image would have appeared in the text message to Republican voters. Right?
A. Yes.
Q. And it says:
"Gavin Newsom's Prop 50 political power grab is a scheme to gerrymander more congressional seats for democrats so they can take control of Congress, impeach President Trump, and derail the America First agenda."
Did I get that right?
A. Yes.
Q. Okay.
And the California Republican Party

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believed that to be true when it sent this text message to its supporters. Right?
A. Yes.
Q. Can we go to the next page? Are you familiar with this image at all?
A. Yes.
Q. And this is sort of in keeping with the vein of Governor Newsom painting California blue. Is that right?
A. Yes.
Q. And in the text below, it says that:
"Prop 50 is a pure political power grab that puts Gavin Newsom first and Californians last."
Did I get that right?
A. Yes.
Q. And the California Republican Party believed that to be a true statement when it sent it?
A. Yes.
Q. So there is no disagreement here that Proposition 50 is a pure political power grab for Gavin Newsom?
A. Yes.
ATTORNEY DODGE: Sir, could you -- could the tech actually please give Mr. Winn control

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of the document for a moment?
TECHNICIAN: Absolutely.
Mr. Winn, if you click on the document, you will have access and be able to scroll.
THE WITNESS: Okay.
BY ATTORNEY DODGE:
Q. Mr. Winn, I'm just asking you to, you know, take a few moments to maybe scroll through some of these images. And while doing that, my question is, do any of these text messages from the California Republican Party to its supporters mention race or ethnicity?
[Witness reviewed document.]
Q. If you can probably go to the next one and stop?
ATTORNEY COLUMBO: Just for the sake of the record, could we just note where he stopped? Is that Plaintiff 007? The eighth page of the exhibit?
ATTORNEY DODGE: That's fair. I'll represent that Plaintiff's one through seven reflects each MMS text produced in this litigation.
BY ATTORNEY DODGE:
Q. And just because you took a moment to

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review those images, Sir, I'll ask my question again. Which is, based on your review and based on your familiarity with the California Republican Party's campaign against Proposition 50, are you aware, here or in general, of any text messages that the Republican Party sent to its supporters about Proposition 50, that mentioned race or ethnicity?
A. I'm sorry. It seems like a different question from what you asked before.
Q. Yeah. That's fair. Let's unpack it a bit. So based on the images you just reviewed, do any of them mention race or ethnicity?
A. No.
Q. More generally, with respect to all of the California Republican Party's communications with its supporters during Proposition 50 -- meaning specifically blast messages and the like -- did any of those mention race or ethnicity?
A. Not that --
ATTORNEY COLUMBO: Objection.
THE WITNESS: Not that I recall. I'm sorry.
BY ATTORNEY DODGE:
Q. In looking at this image here -- if we could actually just scroll up a little bit? That's

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good.
So it says in the text underneath this image:
"This is a red alert. Election day is today, Tuesday, November 4th."
Do you see that?
A. Yes.
Q. So fair to say, this text was sent on election day as sort of a final reminder to voters?
A. Yes.
Q. And this text also says, quote:
"This is a pure power grab to help democrats take control of Congress, impeach Trump, and derail his agenda."
Do you see that?
A. Yes.
Q. And so, I think this is consistent with what you were saying earlier, Sir. Which is that the California Republican Party's message throughout the campaign was pretty consistent, up to and through election day. Right?
A. Yes.
Q. And that message was Proposition 50 is a pure power grab to help democrats take control of Congress?

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A. Yes.
ATTORNEY DODGE: Could you pull up tab four and label it Winn 6?
TECHNICIAN: Absolutely. Please stand by.
(Exhibit 6 marked for identification)
TECHNICIAN: Exhibit 6 is on the screen.
BY ATTORNEY DODGE:
Q. I will represent to you that this is a email that was produced by the California Republican Party in this litigation. Any reason to doubt that, Sir?
A. No.
Q. And do you recognize this specific email? Or sort of recognize what kind of email it is?
A. Not specific. But kind, yes.
Q. And this was one of presumably many emails sent out to supporters to encourage them to vote against Proposition 50. Right?
A. I might have to read it real quick.
[Witness reviewed document.]
A. Yes.
Q. And in the bolded paragraph, it says:
"If democrats succeed in passing their new congressional map, it would guarantee the end of our GOP House majority."

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Did I get that right?
A. Yes.
Q. And so, that was also an important message for the California Republican Party to convey to voters about Proposition 50. Yes?
A. Yes.
Q. And further down, it also says:
"We cannot risk giving democrats even an inch in this battle."
Do you see that?
A. Yes.
Q. Based on your experience with the California Republican Party, is it your understanding that the voting patterns on Proposition 50 typically broke down on partisan lines?
A. Give me --
Q. Is it fair to say --
A. -- that question again.
Q. Is it fair to say that most Republicans in California oppose Proposition 50?
A. Yeah. I don't have specific -- specific information on that. That was my assumption. Yes.
Q. And would it also then be your understanding that democrats in California usually

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tended to support Proposition 50?
A. It's my -- that would be my assumption.
Q. And so, was it the California Republican Party's view that the campaign and public debate over Proposition 50 was, itself, sort of a partisan dispute?
ATTORNEY COLUMBO: Objection.
BY ATTORNEY DODGE:
Q. You can answer, Sir.
A. Yes.
ATTORNEY DODGE: Can we pull up tab five and call it Winn 7, please?
TECHNICIAN: Absolutely. Please stand by.
(Exhibit 7 marked for identification)
TECHNICIAN: Exhibit 7 is on the screen.
BY ATTORNEY DODGE:
Q. Does this document generally look familiar to you, Sir?
A. Yes.
Q. And the bolded paragraph, the first one says:
"If democrats succeed in passing this new map, we can say goodbye to a GOP House majority and hello to the end of President Trump's presidency."
Did I get that right?

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A. Yes.
Q. And what did the California Republican Party mean when it said "the end of President Trump's presidency?"
A. That if Prop 50 passed, it would eliminate five Republican districts. Which would eliminate the House majority. Which would then affect President Trump's majority in both the House and the Senate, to pass legislation.
Q. And the Republican Party presently has a very narrow majority in the House of Representatives. Fair to say?
A. Yes.
Q. So there was concern that if Proposition 50 passed, it would harm the president's ability to pursue his agenda, and the agenda of the Republican Party?
A. Yes. In the -- yes.
Q. So, we mentioned -- we talked about the California Republican Party's efforts over, you know, the two-and-a-half months of the campaign season. We also spoke about the California Republican Party's efforts when the legislation was in front of the Assembly.
I want to go back to that part about the

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Assembly briefly, just so you have that in mind.
A. Okay.
Q. It was your testimony that the California Republican Party's efforts at that time typically involved, you know, social media posts and the like, broadcasting information about Proposition 50 to voters.
Is that all fair to say?
A. Yes.
Q. Were the social media posts made by the California Republican Party, at that time, generally in keeping with the kinds of advertisements we have looked at here today?
ATTORNEY COLUMBO: Objection.
If you have a question about a post, you should show it to him.
ATTORNEY DODGE: Well, let me restate the question, because I don't actually like it that much.
BY ATTORNEY DODGE:
Q. Were the social media posts that the California Republican Party made in that period, when Proposition 50 was before the legislature, generally in the same vein as the kinds of social media posts it made during the campaign over

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Proposition 50?
ATTORNEY COLUMBO: Objection. Same.
BY ATTORNEY DODGE:
Q. You can answer, Sir.
A. I believe the social media posts at the time were specific to the legislative process, and specific to protecting the Redistricting Commission.
Q. Did the California Republican Party make social media posts and advertisements about the independent redistricting commission and sort of the process by which the bill was enacted, during the campaign as well?
A. I don't recall.
Q. The focus shifted more to the partisan consequences of Proposition 50. Is that fair to say?
A. Yes.
Q. And it's also fair to say that neither when the bills were before the legislature, or during the campaign season, did the California Republican Party make race or ethnicity a key theme when talking about Proposition 50. Fair?
A. Yes.
Q. And just so I'm clear on it, it was your testimony earlier that the California Republican

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Party, as an entity, did not discuss the Proposition 50 legislation with Republican lawmakers while it was pending in the legislature?
ATTORNEY COLUMBO: Objection as to which lawmakers you are referring to.
ATTORNEY DODGE: State --
ATTORNEY COLUMBO: You mean Congress?
ATTORNEY DODGE: State lawmakers in Sacramento.
ATTORNEY COLUMBO: Got you.
THE WITNESS: Can you ask the question again?
ATTORNEY DODGE: Sure.
BY ATTORNEY DODGE:
Q. I just want to understand, is it your testimony that the California Republican Party, as an entity, did not speak with state Republican lawmakers about Proposition 50, while its constituent bills were pending in the state legislature?
A. I don't recall saying that.
Q. Sorry. Maybe you can help me out, then. Did the California Republican Party, as an entity, speak with Republican state lawmakers about Proposition 50 while it was being debated and

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considered by the legislature?
A. I believe we had conversations with them. I don't recall specifics. So...
Q. Those conversations -- can you give me a sense of what those conversations were generally about?
A. I don't -- I can't.
Q. Were they about defeating Proposition 50 in the legislature?
A. Yes.
ATTORNEY COLUMBO: Objection. Chris, are you -- are you guys now -- like can you still hear me?
ATTORNEY DODGE: I can.
ATTORNEY COLUMBO: Okay. Are you guys now taking the position that conversations with legislators are not privileged?
ATTORNEY DODGE: No. That's not what I was doing. I was asking about the general categories of conversations without asking as to the substance. And that's the only question I've asked, and that's the only one I intend to ask.
Could we go ahead and --
ATTORNEY RIVERA: This is Thomas Rivera.

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Just for the record as well, to my knowledge, the party who is asserting kind of privilege is a non-party to this case. Paul Mitchell. Not the defense parties.
ATTORNEY DODGE: That is a worthy thing to point out.
Could we pull up -- well, actually, I don't think I included it. I was going to ask to pull up the complaint.
Why don't we take a five-minute break so I can look at my notes and confer with my colleagues? I might have a handful of more questions, but not many.
And I do think that Mr. Kirn and Mr. Rivera might just have a small handful of questions, but I think we can wrap up fairly efficiently.
Can we go with a five-minute break?
ATTORNEY RIVERA: Absolutely.
ATTORNEY THOMPSON: Thank you.
ATTORNEY DODGE: Okay. If we could go off the record?
COURT REPORTER: Okay. We are off the record.
(Short break.)

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COURT REPORTER: Okay. We are back on the record.
ATTORNEY DODGE: Great.
Could we please pull up the complaint and label it Winn 7? Eight?
TECHNICIAN: Eight is up next, counsel. And please stand by.
(Exhibit 8 marked for identification)
TECHNICIAN: Exhibit 8 is on the screen.
ATTORNEY DODGE: Can you maybe zoom in at the middle, so that Mr. Winn can see it a little better?
BY ATTORNEY DODGE:
Q. Do you recognize this document, Mr. Winn?
A. I do.
Q. Can you tell me what it is?
A. It's the complaint that we filed.
Q. And had you reviewed this document before preparing for your deposition today?
A. I'm sorry, Chris. You broke up for a little bit.
Q. When was the first time you reviewed this document?
A. I believe it was early November.
Q. So around the time the lawsuit was filed?

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A. Yes.
Q. And do you believe the allegations made in this complaint to be true?
A. Yes.
Q. And you, or someone else on behalf of the California Republican Party, authorized this lawsuit to be filed in the California Republican Party's name?
A. I did.
Q. Okay.
ATTORNEY DODGE: Can we go to the next page? Can we zoom in on paragraph one?
BY ATTORNEY DODGE:
Q. So this paragraph in the complaint says:
"This lawsuit challenges the constitutionality of California's congressional district maps that will be implemented following the passage of Proposition 50.
Specifically, the California legislature violated the Fourteenth and Fifteenth Amendments to the Constitution when it drew new congressional district lines, based on race. Specifically to favor Hispanic voters without cause or evidence to justify it."
Did I read that correctly?

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A. Yes.
Q. Okay.
Prior to the filing of this lawsuit, had the California Republican Party ever stated publicly that Proposition 50 was meant to favor Hispanic voters?
A. I believe so.
Q. And when was that?
A. I believe in some social media posts. And I believe the chairwoman had, in an interview.
Q. Do you know if those social media posts -- let me ask it a different way.
Were you asked to collect those social media posts as part of this litigation?
A. Yeah. Yes, we were. And I believe that our coms director did provide that information.
Q. And do you know if they were ultimately produced in this litigation?
A. I don't know.
Q. And based on your recollection, can you tell me, at a general level, what those social media post said?
A. I believe it was how they would affect certain populations of African American communities. Asian communities. I believe that was the case.

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ATTORNEY COLUMBO: Hey, Chris, could we go off the record for one sec?
ATTORNEY DODGE: Sure.
(Off the record.)
COURT REPORTER: Okay. We are back on.
BY ATTORNEY DODGE:
Q. So it's your testimony that there were Republican Party social media posts that expressly made reference to certain race and ethnic groups --
A. I believe so.
Q. -- during the campaign?
A. I believe so.
Q. Okay.
And to the best of your knowledge, the California Republican Party collected those posts and produced them in this litigation?
A. I believe so.
Q. Going back to my original question, it was a bit more specific than what you mentioned. My question specifically was, prior to the filing of this lawsuit, did the California Republican Party ever publicly state that Proposition 50 was meant to favor Hispanic voters?
A. I don't recall, for sure. You asked specifically about race, and that's all I can say.

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Q. So, sitting here today, you do not recall the California Republican Party ever publicly stating, prior to this lawsuit, that Proposition 50 would specifically favor Hispanic voters?
A. I do not recall.
Q. Prior to this lawsuit, did the California Republican Party ever publicly state that Proposition 50 violated the Fourteenth and Fifteenth Amendments to the U.S. Constitution?
A. I do not recall.
Q. So to put it another way, sitting here today, you do not recall the California Republican Party ever publicly stating that Proposition 50 violated the Fourteenth and Fifteenth Amendments, prior to the filing of this lawsuit. Fair?
A. That is correct.
Q. Do you -- does the California Republican Party believe that a ballot measure being unconstitutional would be a good reason to vote against it?
A. I'm sorry. Can you --
ATTORNEY COLUMBO: Objection.
ATTORNEY DODGE: It's been a long week.
My questions are -- let me restate the question, Sir.

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BY ATTORNEY DODGE:
Q. Would a ballot measure being unconstitutional be a good reason to vote against it?
A. Sure.
Q. Would the California Republican Party ordinarily want to point out to voters that a proposed law was unconstitutional, in encouraging them to vote against it?
A. Yes.
Q. Is there a reason the California Republican Party did not tell voters, during the campaign, that Proposition 50 would specifically favor Hispanic voters?
A. We focused on what we felt would motivate Republican voters, which were our targeted group we were -- our role as the California Republican Party was to turn out Republican voters. And we chose what we felt would motivate those voters to actually turn out.
And, yes. We talked about the unconstitutionality with regard to the Redistricting Commission, and other things. But that is what we focused on.
So we focused on things that would turn

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out Republican voters. This --
Q. So to --
A. Yeah.
Q. I didn't mean to cut you off.
A. No. That's okay.
Q. So do you not think that Proposition 50 -- strike that.
It's your view that Proposition 50 being a racial gerrymander would not have motivated Republican voters to turn out against it?
A. No. It may have motivated some voters, but it -- the other arguments we made; the theme that we had adopted was what we felt would motivate Republican voters. That was what we focused on.
Q. So you focused on what would resonate most with voters?
A. Yes. Our targeted voters. Yes. Which was Republicans.
Q. My last question for you, are there any questions I should have asked you today?
A. Not that I can think of.
Q. Great.
ATTORNEY DODGE: Thank you very much for your time. I appreciate it.
I will pass the witness to either Mr. Kirn

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or Mr. Rivera, if they still have questions.
ATTORNEY KIRN: State doesn't have any questions for you, Mr. Winn, at this time. We appreciate you being here.
THE WITNESS: Okay.
ATTORNEY RIVERA: Likewise, LULAC has no questions at this time either, Mr. Winn. Thank you for your time.
ATTORNEY DODGE: Great. Then I think we can -- sorry. I didn't mean to cut someone off.
ATTORNEY COLUMBO: No. I just said thanks. We are all set as well.
ATTORNEY DODGE: Great. We can go off the record, then.
COURT REPORTER: Okay. Thank you. We are off the record.
Can I get the orders for the transcript, please?
ATTORNEY DODGE: DCCC will take one.
ATTORNEY RIVERA: No order --
ATTORNEY COLUMBO: Likewise for plaintiffs.
COURT REPORTER: I'm not sure who said that.

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ATTORNEY COLUMBO: It's Columbo, on behalf of the plaintiffs. Yes. I'll take one.
COURT REPORTER: Thank you.
ATTORNEY KIRN: State defendants as well. And then, just what I mentioned with the invoice at the beginning of the call. We appreciate it. As soon as we can get that.
COURT REPORTER: Okay.
ATTORNEY RIVERA: And no transcript order for defendant, LULAC, Ms. Mitchell. We are good for now. Thank you.
COURT REPORTER: Okay. Thank you.
(Whereupon, the deposition adjourned at 5:31 p.m. Pacific Time)

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REPORTER'S CERTIFICATE

I, GISELLE MITCHELL-MARGERUM, the undersigned, a Registered Professional Reporter, Certified Reporting Instructor, Licensed Court Reporter, and Certified Court Reporter, do hereby certify:

That the witness, SCOTT WINN, before examination was remotely duly sworn to testify to the truth, the whole truth, and nothing but the truth.

That the foregoing deposition was taken remotely stenographically by me on Friday, December 12, 2025, and thereafter was transcribed by me, and that the deposition is a full, true, and complete transcript of the testimony, including questions and answers, and objections, motions and exceptions made by counsel.

That reading and signing was not requested; and that I am neither attorney nor counsel for, nor related to or employed by, any of the parties to the action in which this deposition was taken; and that I have no interest, financial or otherwise, in this case.

IN WITNESS WHEREOF, I have hereunto set my hand this 14th day of December, 2025.

GISELLE MITCHELL-MARGERUM, RPR, CRI, CCR, LCR, ACCR, CSR
CALIFORNIA CSR 14424

Ex. 444

Statewide Special Election

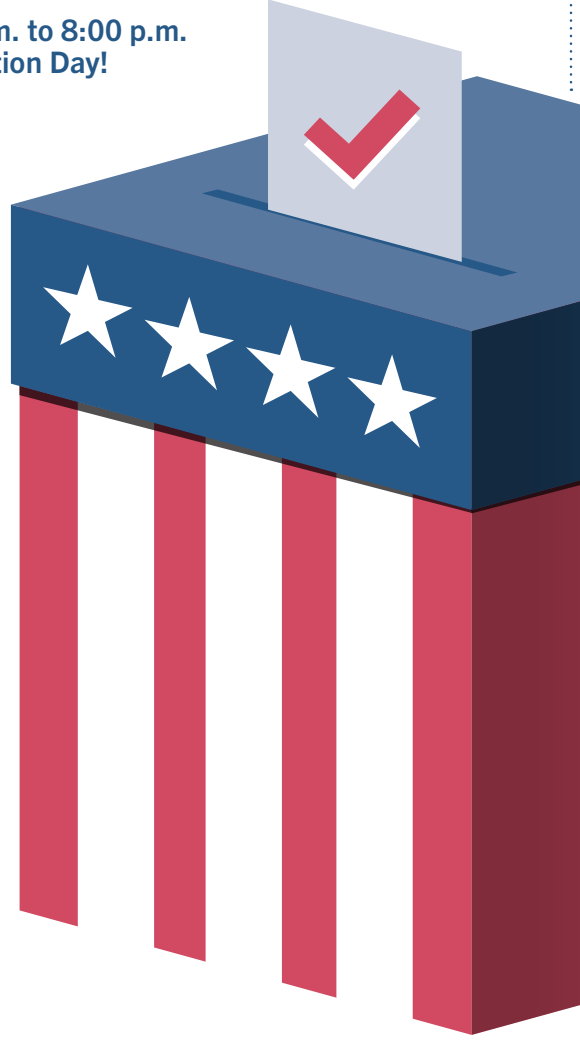
Tuesday, November 4, 2025

Official Voter Information Guide

Don't Delay, Vote Today!

Early vote-by-mail ballot voting period is from October 6 through November 4, 2025.

Polls are open from 7:00 a.m. to 8:00 p.m. on November 4, 2025, Election Day!



CALIFORNIA TRUSTED INFO

Every registered voter in California will receive a vote-by-mail ballot.

Vote-by-mail ballots are mailed on or before October 6.

Vote-by-mail ballots can be voted and returned as soon as they are received.

Vote-by-mail drop boxes open October 7.

In-person voting options will be available in all counties.

Mobile-Friendly
SCAN ME

Certificate of Correctness

I, Shirley N. Weber, Secretary of State of the State of California, do hereby certify that the information included herein will be submitted to the electors of the State of California at the Statewide Special Election to be held throughout the State on November 4, 2025, and that this guide has been correctly prepared in accordance with the law. Witness my hand and the Great Seal of the State in Sacramento, California, this 17th day of September, 2025.

Shirley N. Weber, Ph.D.
Secretary of State

VOTER BILL OF RIGHTS

YOU HAVE THE FOLLOWING RIGHTS:

1. **The right to vote if you are a registered voter.** You are eligible to vote if you are:
   - a U.S. citizen living in California
   - at least 18 years old
   - registered where you currently live
   - not currently serving a state or federal prison term for the conviction of a felony, and
   - not currently found mentally incompetent to vote by a court

2. **The right to vote if you are a registered voter even if your name is not on the list.** You will vote using a provisional ballot. Your vote will be counted if elections officials determine that you are eligible to vote.

3. **The right to vote if you are still in line when the polls close.**

4. **The right to cast a secret ballot** without anyone bothering you or telling you how to vote.

5. **The right to get a new ballot if you have made a mistake,** if you have not already cast your ballot. You can:

   Ask an elections official at a polling place for a new ballot,
   Exchange your vote-by-mail ballot for a new one at an elections office, or at your polling place, or
   Vote using a provisional ballot.

6. **The right to get help casting your ballot** from anyone you choose, except from your employer or union representative.

7. **The right to drop off your completed vote-by-mail ballot at any polling place** in California.

8. **The right to get election materials in a language other than English** if enough people in your voting precinct speak that language.

9. **The right to ask questions to elections officials about election procedures** and watch the election process. If the person you ask cannot answer your questions, they must send you to the right person for an answer. If you are disruptive, they can stop answering you.

10. **The right to report any illegal or fraudulent election activity** to an elections official or the Secretary of State's office.

    On the web at **www.sos.ca.gov**
    By phone at **(800) 345-VOTE (8683)**
    By email at **elections@sos.ca.gov**

IF YOU BELIEVE YOU HAVE BEEN DENIED ANY OF THESE RIGHTS, CALL THE SECRETARY OF STATE'S CONFIDENTIAL TOLL-FREE VOTER HOTLINE AT **(800) 345-VOTE (8683).**

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Top Contributors to State Candidates and Ballot Measures

When a committee (a person or group of people who receive or spend money for the purpose of influencing voters to support or oppose candidates or ballot measures) raises at least $1 million, it must report its top 10 contributors to the California Fair Political Practices Commission (FPPC). The committee must update the list when there is any change.

These lists are available on the FPPC website at:
fppc.ca.gov/transparency/top-contributors.html

To research campaign contributions for candidates or ballot measures, visit the Secretary of State's website at *powersearch.sos.ca.gov*.

Visit the Secretary of State's Website to:

- Research campaign contributions and lobbying activity *cal-access.sos.ca.gov* OR *powersearch.sos.ca.gov*
- View this voter guide in other languages *voterguide.sos.ca.gov*
- Check your registration status and registration information *voterstatus.sos.ca.gov*
- Find your polling place or a vote center on Election Day *sos.ca.gov/elections/polling-place* OR *voterstatus.sos.ca.gov*
- Get vote-by-mail ballot information *sos.ca.gov/elections/voter-registration/vote-mail*
- Read helpful information for first-time voters *sos.ca.gov/elections/voting-resources/voting-california*
- Watch live election results after polls close on Election Day *electionresults.sos.ca.gov*

Message from the Secretary of State

Dear California Voter,

Your participation in every election is vital to ensuring democracy thrives. As a California voter, you will have an opportunity to vote in the upcoming November 4, 2025, **Statewide Special Election**. This election will ask you to **approve or reject** a ballot proposition.

You have a number of ways to participate as California continues to protect and expand your right to vote. We uphold universal vote-by-mail ballots, multiple in-person voting approaches, same-day voter registration, and provisional voting, all designed to make voting accessible and secure.

This Voter Information Guide is designed to help you make an informed decision on Proposition 50. Inside, you will find key details about when, where, and how to cast your ballot, as well as an impartial summary and analysis of the measure. The guide presents official arguments both in favor of and against Proposition 50, along with rebuttals, so you can consider multiple perspectives before making your choice.

Your Guide Includes:

- A neutral summary of Proposition 50, with arguments for and against, including contact information for supporters and opponents. (PAGE 5)
- Clear instructions on how to vote—by mail, in person, or via secure drop box. Plus, reminders to sign and seal your ballot. (PAGE 7)
- Information on **Where's My Ballot** alerts at *WheresMyBallot.sos.ca.gov*.
- Details on extended voting days and vote centers in Voter's Choice Act counties, where you can register and vote on the same day. (PAGE 6)

Participating in elections is vital to having a say in decisions that affect our lives and how our community operates. I encourage you to take the time to learn about the issue and the implications of this election, then make your choice. Voting means your voice will be heard and you have a say in the future.

Thank you for keeping our democracy strong!

QUICK-REFERENCE GUIDE

PROP 50 AUTHORIZES TEMPORARY CHANGES TO CONGRESSIONAL DISTRICT MAPS IN RESPONSE TO TEXAS' PARTISAN REDISTRICTING. LEGISLATIVE CONSTITUTIONAL AMENDMENT.

SUMMARY *Put on the Ballot by the Legislature*

Requires temporary use of new congressional district maps through 2030. Directs independent Citizens Redistricting Commission to resume enacting congressional district maps in 2031. Establishes policy supporting nonpartisan redistricting commissions nationwide. **Fiscal Impact:** One-time costs to counties of up to a few million dollars statewide to update election materials to reflect new congressional district maps.

WHAT YOUR VOTE MEANS

YES A YES vote on this measure means: The state would use new, legislatively drawn congressional district maps starting in 2026. California's new maps would be used until the California Citizens Redistricting Commission draws new maps following the 2030 U.S. Census.

NO A NO vote on this measure means: Current congressional district maps drawn by the California Citizens Redistricting Commission (Commission) would continue to be used in California until the Commission draws new maps following the 2030 U.S. Census.

ARGUMENTS

PRO Proposition 50—The Election Rigging Response Act—approves temporary, emergency congressional district maps to counter Donald Trump's scheme to rig next year's congressional election and reaffirms California's commitment to independent, nonpartisan redistricting after the next census. Vote Yes on 50 for democracy in all 50 states. Learn more at *StopElectionRigging.com*.

CON Prop. 50 was written by politicians, for politicians—dismantling safeguards that keep elections fair, removes requirements to keep local communities together, and eliminates voter protections that ban maps designed to favor political parties. Vote NO to protect fair elections and keep citizens—not politicians—in charge of redistricting.

FOR ADDITIONAL INFORMATION

FOR

Governor Gavin Newsom
Yes on 50, The Election Rigging Response Act, Governor Newsom's Ballot Measure Committee
555 Capitol Mall, Suite 400
Sacramento, CA 95814
info@stopelectionrigging.com
StopElectionRigging.com

AGAINST

No on Prop. 50—Protect Voters First, Sponsored by Hold Politicians Accountable
2350 Kerner Blvd., Suite 250
San Rafael, CA 94901
(916) 446-6572
info@votersfirstact.org
VotersFirstAct.org

Election Day Information

Polling locations are open from 7:00 a.m. to 8:00 p.m. on Tuesday, November 4, 2025. If you are in line before 8:00 p.m., you can still vote.

Find Your Polling Place or a Vote Center

Polling places and vote centers are established by county elections officials. Look for your polling place address or vote center locations in the county Voter Information Guide that you receive in the mail a few weeks before Election Day.

You may also visit the Secretary of State's website at *vote.ca.gov* or call our toll-free Voter Hotline at (800) 345-VOTE (8683).

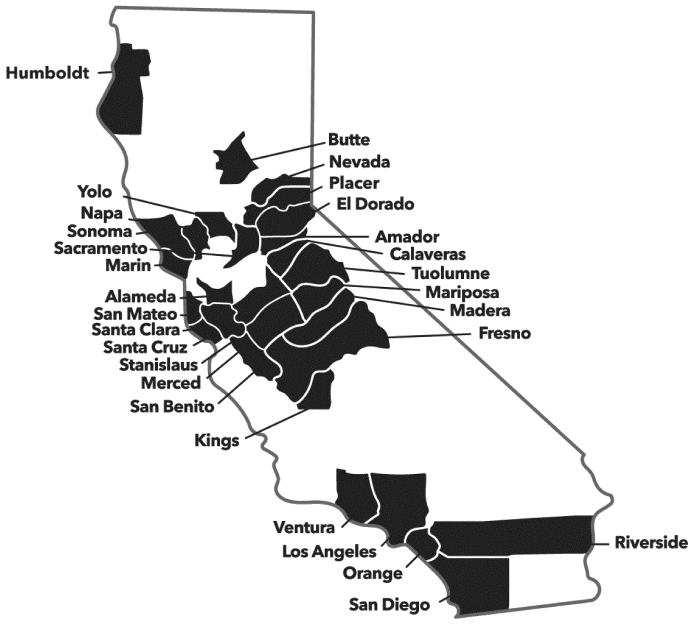
Election results for the November 4, 2025, Statewide Special Election are available after the polls close at 8:00 p.m. on the California Secretary of State's Election Results website at *electionresults.sos.ca.gov*.

Results will begin to be posted at 8:00 p.m. and will be updated throughout Election Night. In the days afterwards, the results will be updated at 5:00 p.m. each day throughout the canvass as counties count the remaining ballots.

The official certified results of the election will be posted by December 12, 2025, at *sos.ca.gov/elections*.

More Days, More Ways to Vote

with the California Voter's Choice Act



Vote in person up to 10 days prior to Election Day

- Alameda
- Amador
- Butte
- Calaveras
- El Dorado
- Fresno
- Humboldt
- Kings
- Los Angeles
- Madera
- Marin
- Mariposa
- Merced
- Napa
- Nevada
- Orange
- Placer
- Riverside
- Sacramento
- San Benito
- San Diego
- San Mateo
- Santa Clara
- Santa Cruz
- Sonoma
- Stanislaus
- Tuolumne
- Ventura
- Yolo

In California, every active registered voter will automatically receive a ballot in the mail before every election. Check your voter registration status to ensure you receive your ballot.

Use a drop box:

Return your ballot to a secure drop off location in any county **up to 28 days before the election**

Vote center:

- Vote in person anywhere in the county **up to 10 days before the election**
- Register to vote and vote same day
- Drop off your ballot

Vote by mail:

Return your ballot by mail **as soon as you receive it**

Visit RegisterToVote.ca.gov or call (800) 345-VOTE (8683) to learn more.

CALIFORNIA VOTER'S CHOICE ACT

VCA.SOS.CA.GOV

Want to skip the line and vote early? **Scan the QR Code to learn more!**

Don't Delay, Vote Today!

All California voters will be sent a vote-by-mail ballot with a prepaid postage return envelope for the November 4, 2025, Statewide Special Election. County elections officials will begin sending vote-by-mail ballots no later than October 6, 2025.

The vote-by-mail ballot voting period begins as soon as ballots are in the mail. Make your voice heard early! Return your vote-by-mail ballot during the voting period of October 6 through the close of polls on November 4.

Voting by Mail is EASY.

Democracy is counting on you! Follow these five easy steps to exercise your right to vote:

☑ **Complete it.**

Mark your choices on your vote-by-mail ballot.

☑ **Seal it.**

Secure your ballot inside the vote-by-mail ballot return envelope you received from your county elections office.

☑ **Sign it.**

Sign the outside of your vote-by-mail ballot return envelope.

Make sure your signature matches the one on your CA driver's license/state ID, or the one you provided when registering to vote. Your county elections office will compare them before they count your ballot.

☑ **Return it.**

By drop box—Drop off your completed vote-by-mail ballot at a secure official drop box in your county at any time between October 7 through the close of polls on November 4.

In person—Drop your completed vote-by-mail ballot off at a secure drop box, polling place, vote center, or county elections office by 8:00 p.m. on November 4. Voting locations will be available in all counties before Election Day. Voting locations offer voter registration, replacement ballots, accessible voting machines, and language assistance.

By mail—Return your ballot by mail as soon as you receive it. Make sure your vote-by-mail ballot return envelope is postmarked no later than November 4.

☑ **Track it.**

Sign up at *wheresmyballot.sos.ca.gov* to receive updates on the status of your vote-by-mail ballot by text message (SMS), email, or voice call.

All voters can get critical updates on their ballots through California's official "Where's My Ballot?" tracking tool. **Signing up takes less than three minutes!**

What you'll be able to track:

You can select to receive notifications on the status of your vote-by-mail ballot by text (SMS), email, or voice call, including alerts if there are any issues with your ballot and instructions for how to correct them to make sure your vote is counted.

Don't miss out on the opportunity to track your ballot every step of the way!

You can also copy this URL into your browser: ***wheresmyballot.sos.ca.gov***

PROPOSITION 50 AUTHORIZES TEMPORARY CHANGES TO CONGRESSIONAL DISTRICT MAPS IN RESPONSE TO TEXAS' PARTISAN REDISTRICTING. LEGISLATIVE CONSTITUTIONAL AMENDMENT.

OFFICIAL TITLE AND SUMMARY

PREPARED BY THE ATTORNEY GENERAL

The text of this measure can be found on page 18 and the Secretary of State's website at *voterguide.sos.ca.gov.*

- In response to Texas' mid-decade partisan congressional redistricting, this measure temporarily requires new congressional district maps, as passed by the Legislature in August 2025, to be used in California's congressional elections through 2030.
- Retains California's independent Citizens Redistricting Commission and directs the Commission to resume enacting congressional district maps in 2031 after the 2030 census and every ten years thereafter.
- Establishes state policy supporting use of fair, independent, and nonpartisan redistricting commissions nationwide.

SUMMARY OF LEGISLATIVE ANALYST'S ESTIMATE OF NET STATE AND LOCAL GOVERNMENT FISCAL IMPACT:

- One-time costs to counties of up to a few million dollars statewide. County costs would be to update election materials to reflect new congressional district maps.

FINAL VOTES CAST BY THE LEGISLATURE ON ACA 8 (PROPOSITION 50)
(RESOLUTION CHAPTER 156, STATUTES OF 2025)

Senate:	Ayes 30	Noes 8
Assembly:	Ayes 57	Noes 20

ANALYSIS BY THE LEGISLATIVE ANALYST

BACKGROUND

U.S. CONGRESS

U.S. Congress. The U.S. Congress is the part of the federal government that makes laws. Congress has two parts: the U.S. Senate and the U.S. House of Representatives (House). Each of the 50 states is represented by 2 senators, with 100 senators in total. The House has 435 members. The number of representatives in the House for each state depends on how many people live in that state. Each member in the House represents an area of the state called a congressional district. California currently has 52 congressional districts. Voters who live in each congressional district elect one member of the House every two years to represent them. The next election for all 435 representatives will be in 2026.

U.S. Census Counts States' Populations Every Ten Years. The number of people living in an area goes up and down over time. Every ten years, the U.S. Census counts the number of people who live in the U.S. The last census was in 2020, and the next census is in 2030. This count is used to determine how many people live in each state and how many representatives in the House each state gets for the next ten years.

CONGRESSIONAL REDISTRICTING

Each State Draws Congressional District Maps Following the U.S. Census. Every ten years, after the U.S. Census is completed, states draw new congressional district maps to reflect their number of House representatives and where people live. This process is called "redistricting." Each state decides what process to use to draw its new district maps. When drawing new maps, each state must follow federal laws. For example, each congressional district in the state must represent about the same number of people.

States Typically Do Not Redistrict Sooner Than Every Ten Years. States typically only draw congressional district maps every ten years, unless a court orders changes to comply with the law. In August 2025, however, the Texas Legislature passed a bill to adopt new maps for the 2026 elections without a court order. Several other states also are considering changes to their maps before the 2026 elections.

ANALYSIS BY THE LEGISLATIVE ANALYST

CONTINUED

Congressional Redistricting in California. State legislatures draw congressional district maps in most states, but some states use commissions to do this job. Before 2010, the California Legislature drew the state's congressional district maps. In 2010, California voters gave this job to an independent commission known as the California Citizens Redistricting Commission (Commission). The Commission includes 14 members: 5 Democratic members, 5 Republican members, and 4 members who are not registered with either of those political parties. When the Commission draws new congressional district maps, it must follow federal and state laws. For example, state law requires, among other things, the Commission to avoid splitting up neighborhoods or local communities of interest to the extent possible. State law also prohibits the Commission from considering political parties, current office holders, or people running for office when it draws the maps.

Current California Congressional Districts. The Commission drew the current maps for California's 52 congressional districts. These maps were based on the 2020 U.S. Census and have been used since the 2022 congressional elections.

PROPOSAL

CALIFORNIA'S CONGRESSIONAL DISTRICT MAPS

Use Legislatively Drawn Congressional District Maps Until After the Next Census. Proposition 50 replaces California's current congressional district maps with new, legislatively drawn maps. (The total number of districts would not change.) Proposition 50's maps must follow federal law, but they are not required to follow the state requirements placed on the Commission. The state would use Proposition 50's maps for congressional elections starting in 2026. The state would use these maps until the Commission draws new district maps, following the 2030 U.S. Census.

NATIONAL CONGRESSIONAL REDISTRICTING

Call for Change in Federal Law. Proposition 50 asks the U.S. Congress to change federal law and propose an amendment to the U.S. Constitution to require redistricting be done by "fair, independent, and nonpartisan redistricting commissions nationwide." Proposition 50 expresses voter support for this idea, but does not change federal law or require any particular action of Congress or the California Legislature.

FISCAL EFFECTS

Minor One-Time Costs to County and State Elections Officials. Counties run elections, and the state oversees them. Because most congressional districts in California would change at least some under the new maps, county and state elections officials would need to update election materials. This would result in one-time costs to counties of **up to a few million dollars** statewide and one-time costs to the state of **roughly $200,000**. The state amount is much less than one-tenth of 1 percent (0.1 percent) of the state's roughly $220 billion General Fund budget. (The General Fund is the account the state uses to pay for most public services, including education, health care, and prisons.)

CURRENT AND PROPOSED CONGRESSIONAL DISTRICT MAPS

This section shows maps of the current and proposed congressional districts (1) statewide, as shown in Figures 1 and 2; (2) in the northern part of the state, as shown in Figures 3 and 4; and (3) in the southern part of the state, as shown in Figures 5 and 6. A description of the census blocks represented by each district in the proposed maps can be found at the following website: *https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB604*

Visit *sos.ca.gov/campaign-lobbying/cal-access-resources/measure-contributions/2025-ballot-measure-contribution-totals* for a list of committees primarily formed to support or oppose this measure.

Visit *fppc.ca.gov/transparency/top-contributors.html* to access the committee's top 10 contributors.

For the full text of Proposition 50, see page 18.

ANALYSIS BY THE LEGISLATIVE ANALYST

CONTINUED

Figure 1

Current Congressional Districts

Note: See northern and southern congressional district maps for district numbers for the Bay Area and Los Angeles regions. Map reflects data posted to the California Citizens Redistricting Commission website.

ANALYSIS BY THE LEGISLATIVE ANALYST

CONTINUED

Figure 2

Proposed Congressional Districts

Note: See northern and southern congressional district maps for district numbers for the Bay Area and Los Angeles regions. Map reflects data posted to the California Legislature elections committees' (Assembly Elections Committee and Senate Elections and Constitutional Amendments Committee) websites.

For the full text of Proposition 50, see page 18.

ANALYSIS BY THE LEGISLATIVE ANALYST

CONTINUED

Figure 3

Current Northern Congressional Districts

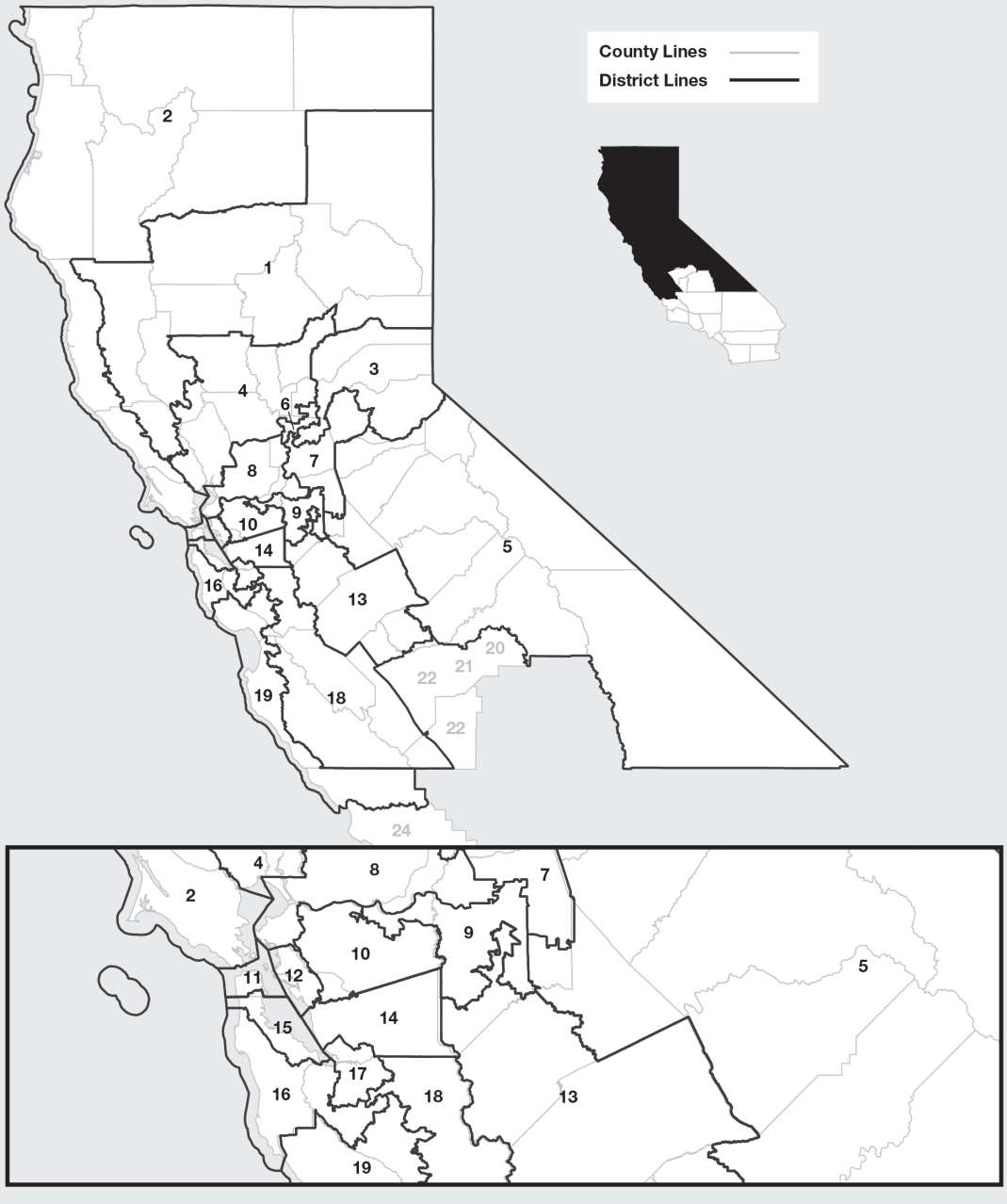
Note: Map reflects data posted to the California Citizens Redistricting Commission website.

ANALYSIS BY THE LEGISLATIVE ANALYST

CONTINUED

Figure 4

Proposed Northern Congressional Districts



Note: Map reflects data posted to the California Legislature elections committees' (Assembly Elections Committee and Senate Elections and Constitutional Amendments Committee) websites.

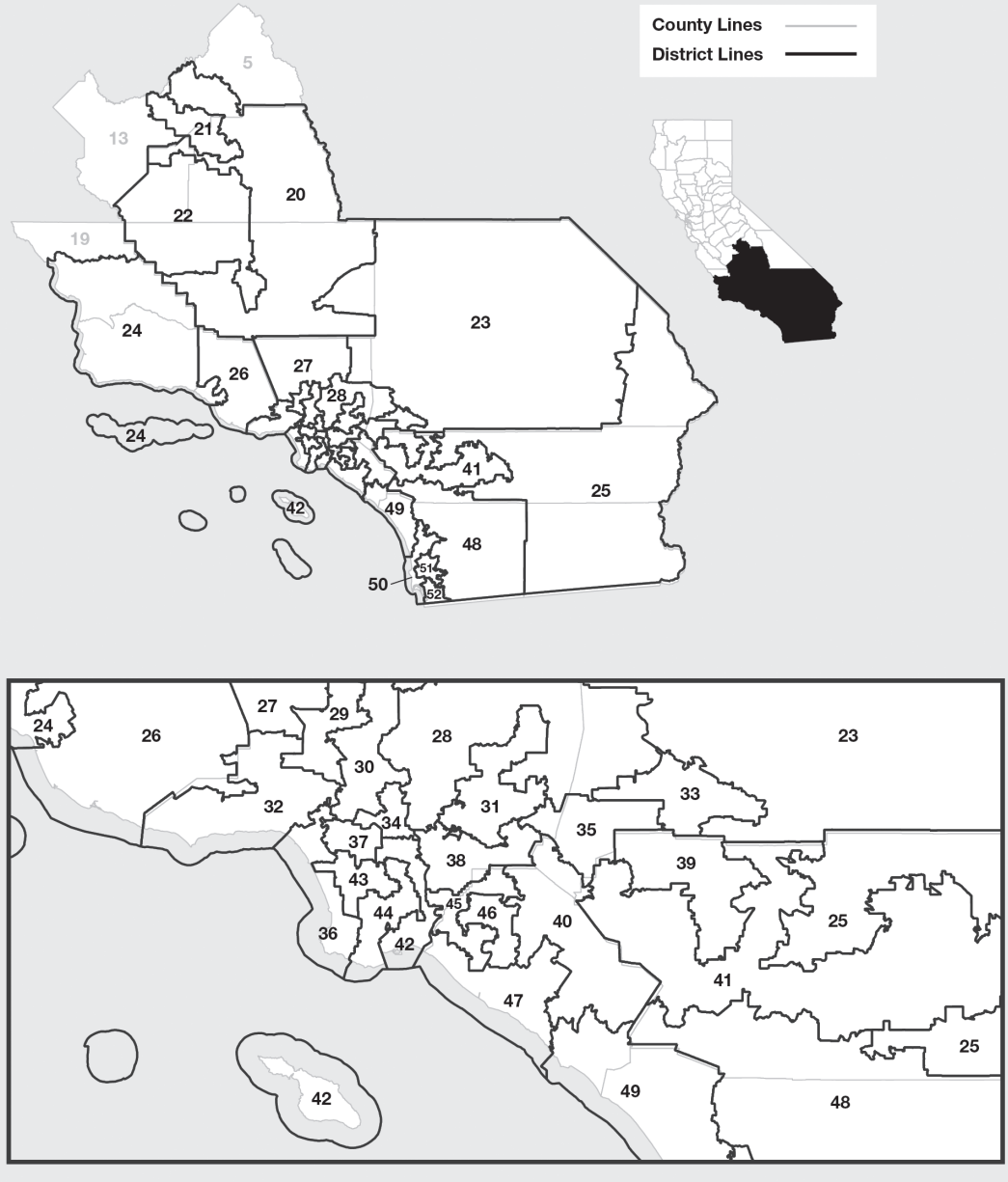
For the full text of Proposition 50, see page 18.

ANALYSIS BY THE LEGISLATIVE ANALYST

CONTINUED

Figure 5

Current Southern Congressional Districts



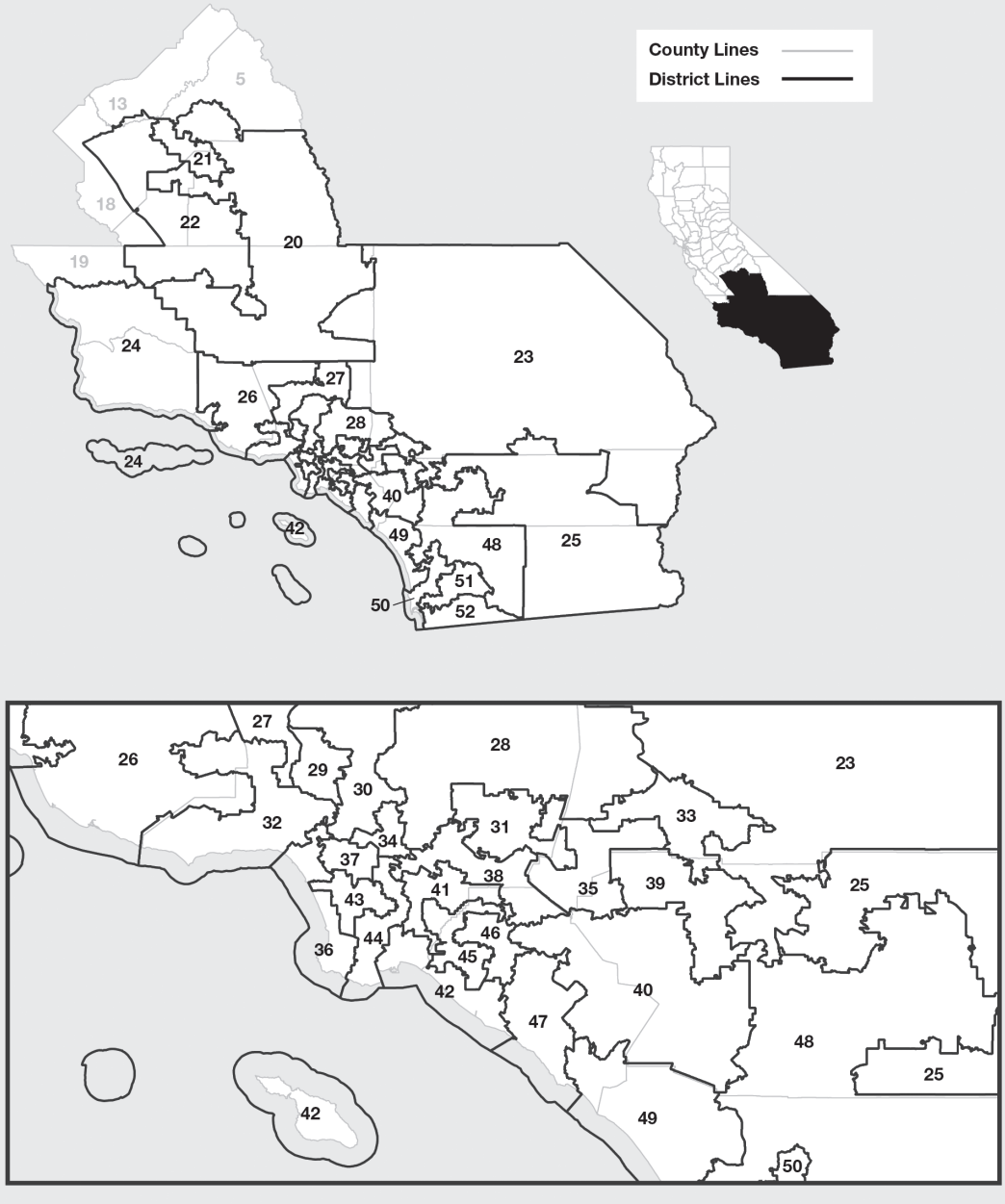
Note: Map reflects data posted to the California Citizens Redistricting Commission website.

ANALYSIS BY THE LEGISLATIVE ANALYST

CONTINUED

Figure 6

Proposed Southern Congressional Districts



Note: Map reflects data posted to the California Legislature elections committees' (Assembly Elections Committee and Senate Elections and Constitutional Amendments Committee) websites.

For the full text of Proposition 50, see page 18.

PROPOSITION **50** AUTHORIZES TEMPORARY CHANGES TO CONGRESSIONAL DISTRICT MAPS IN RESPONSE TO TEXAS' PARTISAN REDISTRICTING. LEGISLATIVE CONSTITUTIONAL AMENDMENT.

★ ARGUMENT IN FAVOR OF PROPOSITION 50 ★

STOP TRUMP FROM RIGGING THE 2026 ELECTION

Donald Trump and Texas Republicans are making an unprecedented power grab to steal congressional seats and rig the 2026 election before voting even begins.

Other Republican states are following suit. They want to steal enough seats to control Congress even if voters overwhelmingly reject their agenda.

This isn't politics as usual. It's an emergency for our democracy.

ENSURE FAIR REPRESENTATION IN CONGRESS

We have already seen how Trump has recklessly imposed tariffs and hurt California families, denied disaster assistance to fire victims, and ordered mass arrests without warrants. The 2026 election for Congress represents our only chance to provide an essential check and balance on Trump's dangerous agenda.

If Californians don't act now, Donald Trump will seize total power for two more years. Proposition 50, the Election Rigging Response Act, will put a stop to their anti-democratic scheme. Here's what it does.

- *LEVELS THE PLAYING FIELD.* Prop. 50 makes sure the 2026 mid-term elections are conducted on a level playing field without an unfair advantage for Republicans.
- *COMMITS TO FAIR REDISTRICTING.* Prop. 50 reaffirms California's commitment to independent redistricting and calls for a nationwide commitment to fair and impartial maps.
- *GIVES VOTERS THE POWER.* Prop. 50 puts the power in the hands of the People of California, not backroom politicians, to approve emergency congressional district maps in response to Trump's election rigging scheme.
- *IS FAIR AND PROPORTIONAL.* Prop. 50 provides emergency maps only because Republicans moved forward with their power grab.
- *IS TEMPORARY.* These maps expire in 2030. Prop. 50 preserves California's award-winning redistricting reforms and reaffirms the California Citizens Redistricting Commission's authority to draw congressional districts after the next census.

The stakes couldn't be higher. If Republicans rig the election and steal control of Congress next year, they'll continue to eliminate healthcare for millions of Americans, slash funding for schools, and cut essential services for veterans to pay for tax breaks for billionaires and big corporations.

PROTECT DEMOCRACY IN ALL 50 STATES

California has a duty to defend democracy. To do that, we can't unilaterally disarm or fight with both hands tied behind our backs. When Trump tries to rig elections, we must fight back with every tool available.

Prop. 50 draws fair maps that represent California's diverse communities and ensure our voices aren't silenced by partisan gerrymandering in other states.

California leads the nation in protecting voting rights and fair elections. When other states try to silence our voices and rig the system, we must respond decisively.

Join President Barack Obama, Governor Gavin Newsom, Senator Alex Padilla, Senator Adam Schiff, Speaker Emerita Nancy Pelosi, election experts, independent redistricting commissioners, Planned Parenthood, the NAACP, California veterans, teachers, and nurses.

Vote YES on Prop. 50 to stop Trump's election rigging scheme.

Vote YES for checks and balances.

Vote YES to protect democracy in all 50 states.

Governor Gavin Newsom

U.S. Senator Alex Padilla

U.S. Speaker Emerita Nancy Pelosi

★ REBUTTAL TO ARGUMENT IN FAVOR OF PROPOSITION 50 ★

THE WRONG PATH—NO ON PROP. 50

We know American democracy is on fire, but accelerating gerrymandering only adds fuel! Politicians are seizing this crisis to justify a power grab.

PROP. 50 DOES NOT DEFEND OUR DEMOCRACY

Prop. 50 is not a magic pill to cure the nation's ills. It claims to protect democracy, yet diminishes our communities' voices and is ineffective against any overreach of presidential power. Vote NO.

California gerrymandering allowed the Legislature to draw partisan seats without transparency or citizen input, solely to protect incumbents. By 2001, the government was gridlocked, with legislators held hostage to the extremes of their parties.

Voters rose up and handed line-drawing over to citizens, resulting in:

- *Competitive Districts:* Previously safe seats now must be earned.
- *Better Representation:* Women in the Legislature doubled, Asian representation tripled, Black representation nearly doubled, and Latino seats grew by 8%.
- *Government for the People:* With more moderate representatives, the Legislature passed bipartisan legislation, working for the interests of all Californians.

WE THE PEOPLE

Districts do not belong to either party; they belong to the People. But, party bosses want to call the shots—again. NO to a "pay-to-play" system.

Prop. 50 says this is "temporary," yet the Legislature will bypass the independent Citizens Redistricting Commission again in 2028, 2030—and perhaps beyond. Don't be fooled.

Legislators drew this map behind closed doors for you to rubber-stamp. It is not your choice.

Vote NO on partisan gerrymandering. Vote NO on Prop. 50.

Cynthia Dai, Rotating Chair
First Citizens Redistricting Commission

Jeanne Raya, Rotating Chair
First Citizens Redistricting Commission

Jodie Filkins Webber, Rotating Chair
First Citizens Redistricting Commission

Arguments printed on this page are the opinions of the authors and have not been checked for accuracy by any official agency.

★ ARGUMENT AGAINST PROPOSITION 50 ★

PROPOSITION 50: A POWER GRAB BY POLITICIANS

Prop. 50 was written by politicians, for politicians. Prop. 50 dismantles constitutional safeguards that keep election maps fair. It removes requirements to keep cities, counties, and local communities together, and eliminates voter protections that ban maps designed to favor incumbents or political parties—putting politicians back in charge of drawing their own districts, or those of their friends.

A "NO" vote protects fair elections and keeps the people of California—not politicians—in charge of redistricting.

NO ON PROP. 50: IT REPEALS LANDMARK VOTER-APPROVED ELECTION REFORMS

For decades, Sacramento politicians drew their own district boundaries behind closed doors with no public oversight—guaranteeing their reelection, denying voters a real choice, and shutting out many women and people of color from elected office.

In 2008, California voters approved historic election reform—creating the independent California Citizens Redistricting Commission. Voters decided district lines should be drawn by a balanced panel of everyday citizens—not by politicians who stood to benefit.

Prop. 50 throws out citizen-drawn congressional maps created through a transparent public process with input from over 35,000 Californians. Instead, politicians secretly drew maps—leaving voters with NO real say.

NO ON PROP. 50: ANOTHER SCHEME TO PERMANENTLY END INDEPENDENT REDISTRICTING

In 2008 and 2010, the Democratic Party and special interests spent millions of dollars to stop citizen redistricting. Later, the California Republican Party even sued to overturn citizen-drawn maps—and lost. Now, Sacramento politicians are scheming to regain control with Prop. 50.

Make no mistake: Prop. 50 is not temporary. For over half a decade, politicians get to impose their gerrymandered maps. Worse, it sets a dangerous precedent—opening the door for Sacramento to keep drawing election maps beyond 2031—giving politicians permanent power to shield themselves and their allies from accountability for California's high cost of living, skyrocketing housing costs, and rising energy bills.

NO ON PROP. 50: DON'T BE MISLED BY POLITICAL SPIN

The same politicians who opposed independent redistricting from the start now claim Prop. 50 will "save democracy." In truth, Prop. 50 weakens fair representation by shutting the public out and bringing gerrymandering back to California.

Prop. 50 is not democratic; it gives voters a take-it-or-leave-it decision on the most partisan maps in California's history—a product of politicians' secretive backroom deals with ZERO meaningful public engagement.

Prop. 50 divides communities to benefit politicians, splitting counties 114 times and cities 141 times—far more than the citizen-drawn maps.

"When politicians gerrymander, they divide our neighborhoods and weaken the voice of communities of color. Whatever happens in Texas, we cannot save democracy by destroying it in California. Vote NO on Prop. 50."—Reverend Mac Shorty, Civil Rights Leader

NO ON PROP. 50: A MASSIVE WASTE OF TAXPAYER MONEY

The Legislature has called a special election just to pass this politician-protecting constitutional change—costing taxpayers $200,000,000.

With a massive budget deficit, Sacramento politicians are making painful cuts to health care, housing, education, and public safety. Instead of protecting important programs, they're spending it on a political power grab.

Vote NO on Prop. 50.

VotersFIRSTAct.org

Roberto Moncada, Board Member
United Latinos Action

Faith Bautista Tamashiro, President
National Diversity Coalition

Taylor Shorty, Board Member
Community RePower Movement

★ REBUTTAL TO ARGUMENT AGAINST PROPOSITION 50 ★

WARNING: NO ON 50 IS BACKED BY TRUMP EXTREMISTS

Who's spending millions against Prop. 50?

An anti-choice mega-millionaire named Charles Munger Jr. who wants to help Donald Trump and Red State Republicans rig the 2026 elections and hand Trump unchecked power for two more years.

Independent redistricting commissioners, election experts, and leading civil rights organizations—from the NAACP to the National Democratic Redistricting Committee—urge you to reject the lies spread by NO on 50's phony front groups.

Lie #1: "Prop. 50 repeals landmark voter-approved election reforms." This is plainly false. Prop. 50 calls on all states to end partisan gerrymandering and reaffirms the power of the California Citizens Redistricting Commission to draw the lines after the next census.

Lie #2: "Prop. 50 removes requirements to keep cities, counties, and local communities together." Prop. 50 does the opposite, keeping MORE cities and counties combined, and communities together than California's existing maps.

Lie #3: "Prop. 50 puts politicians back in charge of drawing their own districts." Untrue. Prop. 50 puts power to approve emergency maps in the hands of voters, not politicians.

Lie #4: "Prop. 50 permanently ends independent redistricting." Also untrue. Prop. 50 is a temporary and proportional response to Trump's election-rigging scheme and expires in 2030.

Californians cannot allow Donald Trump and Texas Republicans to rig the 2026 election and silence our voices.

Vote YES on Prop. 50.

Protect democracy, preserve nonpartisan redistricting and ensure a fair election in all 50 states.

Sara Sadhwani, Commissioner
2020 California Citizens Redistricting Commission

Jodi Hicks, President
Planned Parenthood Affiliates of California

Nikki Davis Milevsky, President
Sacramento City Teachers Association

50

PROPOSITION 50

This amendment proposed by Assembly Constitutional Amendment 8 of the 2025–2026 Regular Session (Resolution Chapter 156, Statutes of 2025) expressly amends the California Constitution by adding a section thereto; therefore, new provisions proposed to be added are printed in *italic type* to indicate that they are new.

PROPOSED AMENDMENT TO ARTICLE XXI

First—This measure shall be known, and may be cited, as the "Election Rigging Response Act."

Second—The people of the State of California find and declare all of the following:

(a) President Donald Trump has called on Republican-led states to undertake an unprecedented mid-decade redistricting of congressional seats to rig the 2026 United States midterm elections before voting begins.

(b) The State of Texas has convened a special session of its Legislature to redraw congressional district maps to unfairly advantage Republicans.

(c) The Legislature of the State of Florida has established a select committee to advance an extraordinary mid-decade redistricting to unfairly advantage Republicans.

(d) Republicans have urged the State of Ohio to conduct its mid-decade redistricting to unfairly produce more Republican seats in Congress.

(e) Republican officials in the States of Indiana, Missouri, New Hampshire, Nebraska, and South Carolina are also considering President Trump's call for the mid-decade redistricting of congressional seats to unfairly advantage Republicans.

(f) President Trump and Republicans are attempting to gain enough seats through redistricting to rig the outcome of the 2026 United States midterm elections regardless of how the people vote.

(g) President Trump's election-rigging scheme is an emergency for our democracy.

(h) The 2026 United States midterm elections are voters' only chance to provide an essential check and balance against President Trump's dangerous agenda.

(i) California has long stood as a national leader for fair, independent, and nonpartisan redistricting.

(j) California calls on all other states to commit to fair and impartial drawing of maps.

(k) California has a duty to defend democracy.

(*l*) The 2026 United States midterm elections for Congress must be conducted on a level playing field without an extreme and unfair advantage for Republicans.

(m) The people of California, not politicians, should have the power to approve temporary congressional district maps in response to President Trump's election-rigging scheme.

(n) It is the intent of the people that California's temporary maps be designed to neutralize the partisan gerrymandering being threatened by Republican-led states without eroding fair representation for all communities.

Third—That Section 4 is added to Article XXI thereof, to read:

SEC. 4. (a) It is the policy of the State of California to support the use of fair, independent, and nonpartisan redistricting commissions nationwide. The people of the State of California call on the Congress of the United States to pass federal legislation and propose an amendment of the United States Constitution to require the use of fair, independent, and nonpartisan redistricting commissions nationwide.

(b) In response to the congressional redistricting in Texas in 2025, and notwithstanding any other provision of this Constitution or existing law, the single-member districts for Congress reflected in Assembly Bill 604 of the 2025–26 Regular Session pursuant to the requirements of Chapter 5 (commencing with Section 21400) of Division 21 of the Elections Code shall temporarily be used for every congressional election for a term of office commencing on or after the date this subdivision becomes operative and before the certification of new congressional boundary lines drawn by the Citizens Redistricting Commission pursuant to subdivision (d).

(c) (1) The Attorney General has the sole legal standing to defend any action regarding a congressional district map adopted pursuant to subdivision (b).

(2) The California Supreme Court has original and exclusive jurisdiction in all proceedings in which a congressional district map adopted pursuant to subdivision (b) is challenged.

(d) The Citizens Redistricting Commission established pursuant to Section 1 shall continue to adjust the boundary lines of the congressional, State Senatorial, Assembly, and Board of Equalization districts in conformance with the standards and process set forth in Section 2 in 2031, and every 10 years thereafter as provided in Section 1.

Fourth—The provisions of this measure are severable. If any portion, section, subdivision, paragraph, clause, sentence, phrase, word, or application of this measure is for any reason held to be invalid by a decision of any court of competent jurisdiction, that decision shall not affect the validity of the remaining portions of this measure. The Legislature hereby declares that it would have proposed, and the voters hereby declare that they would have adopted, this measure and every portion, section, subdivision, paragraph, clause, sentence, phrase, word, and application not declared invalid or unconstitutional without regard to whether any portion of this measure or application of this measure would be subsequently declared invalid.

Tips for California's Military and Overseas Voters

Taking part in elections is more convenient than ever for Californians serving in the military or living outside the United States. It begins when you register to vote as a military or overseas voter and receive election materials by mail, fax, or email. Be prepared!

- **Start early**. California's county elections officials must send ballots to military and overseas voters no later than 45 days before Election Day. Fill out a voter registration application early at *registertovote.ca.gov* to ensure that you receive your voting materials in time and can return your voted ballot by Election Day.
- **Know your options**. When registering to vote as a military or overseas voter, you can choose to have your ballot mailed, faxed, or emailed to you. Additionally, you may visit your county elections official's website for information about how to download your ballot and election materials. You may return your voted ballot to your county elections official by mail or, in certain circumstances, by fax. If you meet the requirements to return your ballot by fax, you must also fax the Oath of Voter form (available from your county elections official) waiving your right to a confidential ballot.

  Alert! The Federal Voting Assistance Program (FVAP) has discontinued their service of faxing military and overseas voters' election materials to county elections officials.

  What this means: you can no longer send your voted ballot to *fax@fvap.gov*.

  If you wish to return your voted ballot by fax, you must send it directly to your county elections official.

- **Stay in touch**. Once you register as a military or overseas voter, you will continue to receive a ballot and election materials from your county elections official before each statewide election. However, you will need to update your voter registration if you change your address, your name, or your political party preference. Visit *sos.ca.gov/elections/voter-registration/military-overseas-voters/* for more election resources designed especially for you.

Dates to remember:

October 20, 2025: Last day for military and overseas voters to register to vote for the Statewide Special Election.

October 21—November 4, 2025: Same Day Registration is available. You may "conditionally" register to vote and vote a provisional ballot during this time. Contact your county elections official for more information.

November 4, 2025: Election Day. Return your ballot by mail as soon as you receive it. Mailed ballots must be postmarked no later than Election Day **and** received by your county elections office no later than November 12, 2025. Faxed ballots must be delivered to your county elections office by close of polls, no later than 8:00 p.m. Pacific Standard Time on Election Day.

For more information contact:

California Secretary of State

(800) 345-VOTE (8683)

sos.ca.gov/elections/voter-registration/military-overseas-voters/

Federal Voting Assistance Program

(800) 438-VOTE (8683)

www.fvap.gov

WARNING: ELECTIONEERING PROHIBITED!

Violations can lead to fines and/or imprisonment.

WHERE:

- Within the immediate vicinity of a person in line to cast their ballot or within 100 feet of the entrance of a polling place, curbside voting, or drop box, the following activities are prohibited.

WHAT ACTIVITIES ARE PROHIBITED:

- **DO NOT** ask a person to vote for or against any candidate or ballot measure.
- **DO NOT** display a candidate's name, image, or logo.
- **DO NOT** block access to or loiter near any ballot drop boxes.
- **DO NOT** provide any material or audible information for or against any candidate or ballot measure near any polling place, vote center, or ballot drop box.
- **DO NOT** circulate any petitions, including for initiatives, referenda, recalls, or candidate nominations.
- **DO NOT** distribute, display, or wear any clothing (hats, shirts, signs, buttons, stickers) that include a candidate's name, image, logo, and/or support or oppose any candidate or ballot measure.
- **DO NOT** display information or speak to a voter about the voter's eligibility to vote.

The electioneering prohibitions summarized above are set forth in Article 7 of Chapter 4 of Division 18 of the California Elections Code.

WARNING: CORRUPTING THE VOTING PROCESS IS PROHIBITED!

Violations subject to fine and/or imprisonment.

WHAT ACTIVITIES ARE PROHIBITED:

- **DO NOT** commit or attempt to commit election fraud.
- **DO NOT** provide any sort of compensation or bribery to, in any fashion or by any means induce or attempt to induce, a person to vote or refrain from voting.
- **DO NOT** illegally vote.
- **DO NOT** attempt to vote or aid another to vote when not entitled to vote.
- **DO NOT** engage in electioneering; photograph or record a voter entering or exiting a polling place; or obstruct ingress, egress, or parking.
- **DO NOT** challenge a person's right to vote or prevent voters from voting; delay the process of voting; or fraudulently advise any person that he or she is not eligible to vote or is not registered to vote.
- **DO NOT** attempt to ascertain how a voter voted their ballot.
- **DO NOT** possess or arrange for someone to possess a firearm in the immediate vicinity of a polling place, with some exceptions.
- **DO NOT** appear or arrange for someone to appear in the uniform of a peace officer, guard, or security personnel in the immediate vicinity of a polling place, with some exceptions.
- **DO NOT** tamper or interfere with any component of a voting system.
- **DO NOT** forge, counterfeit, or tamper with the returns of an election.
- **DO NOT** alter the returns of an election.
- **DO NOT** tamper with, destroy, or alter any polling list, official ballot, or ballot container.
- **DO NOT** display any unofficial ballot collection container that may deceive a voter into believing it is an official collection box.
- **DO NOT** tamper or interfere with copy of the results of votes cast.
- **DO NOT** coerce or deceive a person who cannot read or an elder into voting for or against a candidate or measure contrary to their intent.
- **DO NOT** act as an election officer when you are not one.

EMPLOYERS cannot require or ask their employee to bring their vote-by-mail ballot to work or ask their employee to vote their ballot at work. At the time of payment of salary or wages, employers cannot enclose materials that attempt to influence the political opinions or actions of their employee.

PRECINCT BOARD MEMBERS cannot attempt to determine how a voter voted their ballot or, if that information is discovered, disclose how a voter voted their ballot.

The prohibitions on activity related to corruption of the voting process summarized above are set forth in Chapter 6 of Division 18 of the California Elections Code.

Look for Trusted Sources of Election Information

The Secretary of State is committed to ensuring elections are free, fair, safe, secure, accurate, and accessible. Misinformation, intentional or otherwise, continues to confuse voters and create distrust in the electoral process. California has one of the most extensive voting system testing and certification programs in the nation.

Our best defense against rumors and misinformation is you! False election information is more common than you think. If a claim seems outrageous or designed to upset you, it may not be true.

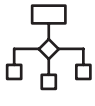
The best sources for trusted election information are your local and state elections officials. To find out more about election facts or common rumors being spread, visit *catrustedinformation.sos.ca.gov*.

Report misinformation to *votesure@sos.ca.gov*.

California Election Security Safeguards

Secure Technology

- County voting systems are not connected to the internet
- Strong security techniques are practiced regularly
- Routine threat monitoring and vulnerability scanning in collaboration with our state and federal partners
- Rigorous voting system testing and certification performed by the California Secretary of State
- Only authorized elections staff have access to systems relevant to their role



Secure Processes

- VoteCal is a centralized statewide voter registration database. VoteCal checks against official records and is regularly updated
- Ballots and election technology must adhere to strict chain-of-custody procedures
- Paper ballots for all registered voters are available
- Post-election audits are performed by elections officials
- Signatures are verified on all vote-by-mail ballot envelopes
- Emergency planning for fire, flood, cyber incidents, and more

Secure Facilities and People

- Physical access control and security of locations
- Security and accessibility assessments completed for all locations
- Ballot drop boxes are secured and monitored
- Election processes open to observation during specific hours of operation
- Phishing and cybersecurity training provided for all staff

California Voter ID & Registration Requirements

Who Can Register to Vote in California?

To register, you must be:

- A United States citizen and a California resident
- 18 years or older on Election Day (or 16 or 17 years old to pre-register)
- Not currently serving a state or federal prison term for a felony
- Not currently found mentally incompetent to vote by a court

Do I Need to Show ID to Vote in California?

In most cases, NO. California does not generally require voters to show identification at the polls.

When MIGHT You Be Asked for ID?

You may need to show ID only if ALL the following apply:

- You're voting for the first time in a federal election
- You registered by mail or online, AND
- You did not provide your CA ID or SSN when registering

You'll be notified in advance if this applies to you.

Poll workers may only request an ID if the voter list clearly indicates it's required.

For more information, visit *vote.ca.gov* or call our Voter Hotline at (800) 345-VOTE (8683).

What Forms of ID Are Acceptable (if required)?

You can show a photo or non-photo ID, including:

- California Driver's License or State ID card
- U.S. Passport
- Student or Military ID
- Official mail from a government agency
- Paycheck or government check
- Utility bill or bank statement

For a complete list, see: *www.sos.ca.gov/elections/hava-id-standards*

Photo ID is not required, it's just one of many valid options. ID does not need to show your address or be government-issued.

Don't Have ID When Voting?

You can still cast a provisional ballot. Your ballot will be counted after elections officials have confirmed you are registered to vote in that county, and you did not already vote in that election.

Check Your Voter Status Online

Visit the Secretary of State's My Voter Status page at *voterstatus.sos.ca.gov* to check your voter status, find your polling place or a vote center, and much more.

To check your voter status, you will need to enter your first name, last name, date of birth, and your California driver's license or California identification card number, or the last four digits of your social security number.

Visit *voterstatus.sos.ca.gov* for important voter details.

Voting Rights Restored for Persons with a Prior Felony Conviction

You can register and vote if you are:

- A U.S. citizen and a resident of California
- 18 years old or older on Election Day
- Not currently found mentally incompetent to vote by a court
- Not currently serving a state or federal prison term for the conviction of a felony

If you meet these requirements, you can vote even if you:

- Have a misdemeanor conviction (a misdemeanor will never prevent you from voting)
- Are on parole supervision or probation
- Are on post-release community supervision (PRCS)

For more information, please visit *votingrightsrestored.sos.ca.gov*.

Register or re-register to vote today!

If you were registered to vote and convicted of a felony, your previous registration may have been canceled.

Register or re-register to vote today online at *registertovote.ca.gov*. You can also request a paper voter registration card by calling the Secretary of State's Voter Hotline at (800) 345-VOTE (8683).

Democracy Needs You! Serve as a Poll Worker

Help your community members exercise their right to vote by signing up to be a poll worker. As a poll worker, you can make sure voters can easily and safely cast their vote. Gain hands-on experience and take part in the single most important right in our democracy—Voting! Complete your form today at *pollworker.sos.ca.gov*.

For more information about being a poll worker, contact your county elections office or call the California Secretary of State at (800) 345-VOTE (8683), or visit *vote.ca.gov*.

New to voting? Get started with 3 easy steps!

1. Register!

- Register to vote by **October 20, 2025**. Register online at *registertovote.ca.gov* or have a voter registration form mailed to you by calling the Secretary of State's toll-free Voter Hotline at (800) 345-VOTE (8683). Voter registration forms are also available at your county elections office, local post office, or library.
- Same Day Voter Registration, known as Conditional Voter Registration in state law, is a safety net for Californians who miss the voter registration deadline of October 20, 2025. Visit *vote.ca.gov* or see page 29 of this guide for more information.
- You are eligible to register to vote and vote if you are a United States citizen and a resident of California, 18 years old or older on Election Day, not currently serving a state or federal prison term for the conviction of a felony, and not currently found mentally incompetent to vote by a court.

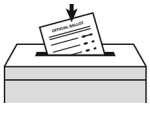
2. Get informed!

- As a registered voter you will receive two information resources in the mail:
  - This Voter Information Guide, which contains information about the statewide ballot measure, the election process, and how to vote. To receive your guide in a different language, call (800) 345-VOTE (8683) or visit *voterguide.sos.ca.gov*.
  - A county Voter Information Guide, which contains a sample ballot, your polling place or vote center location, and other helpful information.
- State campaign expenditure and contribution information related to candidates or ballot measure committees is available at *sos.ca.gov/campaign-lobbying*.

3. Vote!

- You can return your ballot:

By drop box: Every active, registered voter in California will be mailed a ballot for the November 4, 2025, Statewide Special Election. You may personally deliver your ballot to any polling or ballot drop-off location in California by 8:00 p.m. on Election Day.



In person: Polling locations are established by county elections officials and are open from **7:00 a.m. to 8:00 p.m. on Election Day, Tuesday, November 4, 2025**. To find a location to vote early before Election Day, visit *caearlyvoting.sos.ca.gov*.

By mail: Return your ballot by mail as soon as you receive it. Vote-by-mail ballots must be postmarked no later than Election Day and received no later than November 12, 2025.

Option for voters with disabilities: Counties offer an accessible voting option called remote accessible vote-by-mail (RAVBM). RAVBM allows voters with disabilities to receive their ballots at home and mark them independently and privately before sending them back to elections officials.

California Motor Voter

The California Motor Voter program is making registering to vote at the California Department of Motor Vehicles (DMV) more convenient and secure. All eligible individuals completing driver's license, ID card, or change of address transactions online, by mail, or in person at the DMV will be automatically registered to vote unless they choose to "opt out" of automatic voter registration.

The California Motor Voter program applies to Californians who are 18 years or older and meet all the following criteria:

- A United States citizen.
- A resident of California.
- Not currently serving a state or federal prison term for the conviction of a felony.
- Not currently found mentally incompetent to vote by a court.

Voter pre-registration is available for those 16 and 17 years of age. Their voter registration will become active automatically when they turn 18.

For more information, visit *motorvoter.sos.ca.gov*.

To register to vote online, visit *registertovote.ca.gov*.

Voter Registration Privacy Information

Safe at Home Confidential Voter Registration Program: Certain voters facing life-threatening situations may qualify for confidential voter status if they are active members of the Safe at Home program. This includes victims and survivors of domestic violence, stalking, sexual assault, human trafficking, child abduction, and elder/dependent adult abuse, as well as public entity employees/contractors in fear for their safety because of their work for a public entity, and reproductive health care providers, employees, volunteers, and patients in fear for their safety because of their affiliation with a reproductive health care facility. For more information, contact the Secretary of State's Safe at Home program toll-free at (877) 322-5227 or visit *sos.ca.gov/safeathome*.

Voter Information Privacy: Information on your voter registration affidavit will be used by elections officials to send you official information on the voting process, such as the location of your polling place, and the measures and candidates that will appear on the ballot. Commercial use of voter registration information is prohibited by law and is a misdemeanor. Voter information may be provided to a candidate for office, a ballot measure committee, or other person for election, scholarly, journalistic, political, or governmental purposes, as determined by the Secretary of State. Driver's license and social security numbers, or your signature as shown on your voter registration card, cannot be released for these purposes. If you have any questions about the use of voter information or wish to report suspected misuse of such information, please call the Secretary of State's toll-free Voter Hotline at (800) 345-VOTE (8683).

Assistance for Voters with Disabilities

California is committed to ensuring every voter is able to cast their ballot privately and independently.

For more detailed information about what assistance your county offers to voters with disabilities, please check out your county Voter Information Guide or contact your county elections official. County contact information is available at *sos.ca.gov/elections/voting-resources/county-elections-offices*.

Voting at a Polling Place or Vote Center

If you need help marking your ballot, you may choose up to two people to help you. This person cannot be:

- Your employer or anyone who works for your employer
- Your labor union leader or anyone who works for your labor union

Curbside voting allows you to park as close as possible to the voting area. Elections officials will bring you a roster to sign, a ballot, and any other voting materials you may need, whether you are actually at a curb or in a car.

All polling places and vote centers are required to be accessible to voters with disabilities and will have accessible voting machines.

Voting at Home

Remote accessible vote-by-mail (RAVBM) systems provide an accessible option for voters with disabilities to receive their ballots at home and mark them independently and privately before sending them back to elections officials. Contact your county elections official for more information.

Audio and Large Print Voter Information Guides

This guide is available in audio and large print versions as well in English, Chinese, Hindi, Japanese, Khmer, Korean, Spanish, Tagalog, Thai, and Vietnamese at no cost.

To order:

Visit *vote.ca.gov*

Call the Secretary of State's toll-free voter hotline at (800) 345-VOTE (8683)

Download an audio MP3 version at *voterguide.sos.ca.gov/en/audio*

County Elections Offices

Alameda County
(800) 834-6454
www.acvote.org

Alpine County
(530) 694-2281
www.alpinecountyca.gov/

Amador County
(209) 223-6465
www.amadorgov.org/government/elections

Butte County
(530) 552-3400 or (800) 894-7761
(Within Butte County)
www.buttevotes.net

Calaveras County
(209) 754-6376 or (833) 536-8683
www.calaverasgov.us/

Colusa County
(530) 458-0500 or (877) 458-0501
www.countyofcolusa.org/elections

Contra Costa County
(925) 335-7800
www.contracostavote.gov/elections/

Del Norte County
(707) 464-7216
www.co.del-norte.ca.us/departments/Elections

El Dorado County
(530) 621-7480
www.edcgov.us/Government/Elections

Fresno County
(559) 600-8683
www.fresnovote.com

Glenn County
(530) 934-6414
www.countyofglenn.net/dept/elections

Humboldt County
(707) 445-7481
www.humboldtgov.org/Elections

Imperial County
(442) 265-1060
www.elections.imperialcounty.org

Inyo County
(760) 878-0224
elections.inyocounty.us/

Kern County
(661) 868-3590 or (800) 452-8683
www.kernvote.com

Kings County
(559) 852-4401 or
(800) 289-9981 ext. 4401
www.votekingscounty.com

Lake County
(707) 263-2372 or (888) 235-6730
www.lakecountyca.gov/818/Registrar-of-Voters

Lassen County
(530) 251-8217
www.lassencounty.org/dept/county-clerk-recorder/elections

Los Angeles County
(800) 815-2666
www.lavote.gov/home/voting-elections

Madera County
(559) 675-7720 or (800) 435-0509
www.votemadera.com

Marin County
(415) 473-6456
www.marinvotes.org

Mariposa County
(209) 966-2007
www.mariposacounty.org/87/Elections

Mendocino County
(707) 234-6819
www.mendocinocounty.gov/government/assessor-county-clerk-recorder-elections/elections

Merced County
(209) 385-7541 or (800) 561-0619
www.mercedelections.org

Modoc County
(530) 233-6200
www.co.modoc.ca.us/departments/elections/

Mono County
(760) 932-5537 or (760) 932-5530
monocounty.ca.gov/elections

Monterey County
(831) 796-1499 or (866) 887-9274
www.montereycountyelections.us/

Napa County
(707) 253-4321
www.countyofnapa.org/396/elections

Nevada County
(530) 265-1298 or (888) 395-1298
www.nevadacountyca.gov/1847/Elections-Voting

Orange County
(714) 567-7600 or (888) 628-6837
www.ocvote.com

Placer County
(530) 886-5650 or (800) 824-8683
www.placercountyelections.gov

Plumas County
(530) 283-6256 or (844) 676-VOTE
www.plumascounty.us/142/Elections-Division-Home

Riverside County
(951) 486-7200
www.voteinfo.net

Sacramento County
(916) 875-6451 or (800) 762-8019
www.elections.saccounty.gov

San Benito County
(831) 636-4016
www.sanbenitocounty-ca-cre.gov/elections

San Bernardino County
(909) 387-8300
www.sbcountyelections.com

San Diego County
(858) 565-5800 or (800) 696-0136
www.sdvote.com/

San Francisco County
(415) 554-4375
sfelections.sfgov.org

San Joaquin County
(209) 468-2890 or (209) 468-8683
www.sjcrov.org

San Luis Obispo County
(800) 834-4636
www.slovote.com

San Mateo County
(650) 312-5222
www.smcacre.org

Santa Barbara County
(805) 568-2200 or (800) 722-8683
www.sbcvote.com

Santa Clara County
(408) 299-8683 or (866) 430-8683
www.sccvote.org

Santa Cruz County
(831) 454-2060 or (866) 282-5900
www.votescount.com

Shasta County
(530) 225-5730
www.elections.shastacounty.gov

Sierra County
(530) 289-3295
www.sierracounty.ca.gov/214/Elections

Siskiyou County
(530) 842-8084
www.co.siskiyou.ca.us/elections

Solano County
(707) 784-6675 or (888) 933-8683
www.solanocounty.com/elections

Sonoma County
(707) 565-6800 or (800) 750-8683
vote.sonoma-county.org

Stanislaus County
(209) 525-5200 or (833) 772-2260
www.stanvote.com

Sutter County
(530) 822-7122
www.suttercounty.org/elections

Tehama County
(530) 527-8190
www.co.tehama.ca.us/government/departments/elections/

Trinity County
(530) 623-1220
www.trinitycounty.org/214/Elections

Tulare County
(559) 839-2100
tularecoelections.org/elections/

Tuolumne County
(209) 533-5570
www.co.tuolumne.ca.us/elections

Ventura County
(805) 654-2664
www.venturavote.org

Yolo County
(530) 666-8133
www.yoloelections.org

Yuba County
(530) 749-7855
www.yubaelections.org

Check Your Voter Status Online

Visit the Secretary of State's My Voter Status page at *voterstatus.sos.ca.gov* to check your voter status, find your polling place or a vote center, and much more.

To check your voter status, you will need to enter your first name, last name, date of birth, and your California driver's license or California identification card number, or the last four digits of your social security number.

Visit *voterstatus.sos.ca.gov* for important voter details.

What if I forgot to register to vote or update my registration?

No problem! If you missed the October 20, 2025, voter registration deadline, California law allows you to register to vote and vote until 8:00 p.m. on Election Day at your county elections office or at any voting location in your county. This process is called Conditional Voter Registration (CVR) and is commonly referred to as Same Day Voter Registration.

Provisional Voting

Name not on the voter list at the polling place or the vote center?

You still have the right to vote with a provisional ballot.

What is a provisional ballot?

A provisional ballot is a regular ballot placed in a special envelope prior to being put in the ballot box. Provisional ballots are ballots cast by voters who believe they are registered to vote even though their names are not on the official voter registration list at the polling place or vote center.

A voter may need to cast a provisional ballot if they want to vote in person at a polling place or vote center but did not receive their vote-by-mail ballot or if they do not have their vote-by-mail ballot with them to surrender prior to voting in person.

Will my provisional ballot be counted?

Yes, your provisional ballot will be counted after elections officials have confirmed that you are registered to vote in that county, and you did not already vote in that election.

A provisional ballot may be used at any polling place or vote center in the county in which you are registered to vote. Only the election contests you are eligible to vote for will be counted.

How can you check the status of your provisional ballot?

Anyone who casts a provisional ballot has the right to find out from their county elections official if the ballot was counted and, if not, the reason why it was not counted.

You can check the status of your provisional ballot at *voterstatus.sos.ca.gov*.

How to Fix a Missing or Noncomparable Signature on Your Vote-by-Mail Ballot Return Envelope

☑ Possible Issues With Vote-by-Mail or Provisional Ballot Return Envelopes

- **Missing Signature:** You forgot to sign your vote-by-mail ballot return envelope.
- **Signature Doesn't Compare:** Your signature doesn't compare with the one on file with the elections official.

☑ What Happens Next?

- **Notification:** If there's an issue with your ballot, your county elections office will notify you by mail, phone, email, or from the Secretary of State's ***Where's My Ballot?*** tool.
- **How to Fix It:** You can access a form on your county elections official's website to provide your signature and confirm that you voted your ballot.
  - Check your mail or email for instructions from your county elections office
  - Fill out the form and follow instructions on how to return the form
  - Your options to return the form may vary by county
  - Failure to follow instructions may result in your ballot not being counted

☑ Stay Informed With *Where's My Ballot?*

- **Track Your Vote-by-Mail Ballot:** Get automatic updates on your ballot's status by signing up for ***Where's My Ballot?***
- Receive notifications via **text, email, or phone** about:
  - When your ballot is mailed
  - When it is received
  - If it has been counted
  - If there are issues that need to be fixed
- **Sign up today at:** ***wheresmyballot.sos.ca.gov***

☑ Important Deadlines for the November 4, 2025, Statewide Special Election:

- **Mail ballots:** Return your ballot by mail as soon as you receive it. Must be postmarked no later than **November 4, 2025**, and received no later than **November 12, 2025**.
- **Deadline:** The deadline to fix your missing or noncomparable signature is 5:00 p.m. on November 30, 2025, two days prior to the day your county certifies the election.

For more information, visit *vote.ca.gov* or call our Voter Hotline at (800) 345-VOTE (8683).

DATES TO REMEMBER!

Don't Delay, Vote Today!

Early vote-by-mail ballot voting period is from October 6 through November 4, 2025.

Polls are open from 7:00 a.m. to 8:00 p.m. on November 4, 2025, Election Day!

OCTOBER

S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

October 6
County elections officials will begin mailing vote-by-mail ballots on or before this date.

October 6—November 4
Voting period to return vote-by-mail ballot.

October 7
Vote-by-mail secure drop boxes open.

October 20
Last day to register to vote. Same day voter registration is available at your county elections office or voting location after the voter registration deadline, up to and including Election Day.

October 25
First day vote centers open in Voter's Choice Act counties for early in-person voting.

NOVEMBER

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

Tuesday, November 4, 2025
Last day to vote in-person or return a vote-by-mail ballot by 8:00 p.m.

Polls are open from 7:00 a.m. to 8:00 p.m.

Return your ballot by mail as soon as you receive it. Vote-by-mail ballots must be postmarked no later than November 4.

California Secretary of State
Elections Division
1500 11th Street
Sacramento, CA 95814

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OF STATE

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Authorized by the U.S. Postal Service

NOVEMBER 4, 2025

STATEWIDE SPECIAL ELECTION

DATES TO REMEMBER

October 6
County elections officials will begin mailing vote-by-mail ballots on or before this date.

October 6 – November 4
Voting period to return vote-by-mail ballot.

October 7
Vote-by-mail secure drop boxes open.

October 20
Last day to register to vote. Same day voter registration is available at your county elections office or voting location after the voter registration deadline, up to and including Election Day.

October 25
First day vote centers open in Voter's Choice Act counties for early in-person voting.

Tuesday, November 4, 2025
Last day to vote in-person or return a vote-by-mail ballot by 8:00 p.m. Polls are open from 7:00 a.m. to 8:00 p.m. Return your ballot by mail as soon as you receive it. Vote-by-mail ballots must be postmarked no later than November 4.

For additional copies of the Voter Information Guide in any of the following languages, please call:

English: (800) 345-VOTE (8683)
Español/Spanish: (800) 232-VOTA (8682)
中文/Chinese: (800) 339-2857
हिन्दी/Hindi: (888) 345-2692
★ **日本語/Japanese:** (800) 339-2865
ខ្មែរ/Khmer: (888) 345-4917
한국어/Korean: (866) 575-1558
Tagalog: (800) 339-2957
ภาษาไทย/Thai: (855) 345-3933
Việt ngữ/Vietnamese: (800) 339-8163
TTY/TDD: 711

Mobile-Friendly SCAN ME

Are you registered to vote? Check here: *voterstatus.sos.ca.gov*

★ In an effort to reduce election costs, the State Legislature has authorized the State and counties to mail only one guide to each voting household. You may request additional copies by contacting your county elections official or by calling (800) 345-VOTE (8683). ★

OSP 25 160202

Ex. 452

IN RE CA ASSEMBLY FLOOR SESSION

TAPE TRANSCRIPTION OF AUDIO RECORDING

August 21, 2025

CERTIFIED COPY

TAPE TRANSCRIPTION
IN THE MATTER OF:
CA ASSEMBLY FLOOR SESSION
August 21, 2025.
Sacramento, California.
10:18 a.m.
REPORTED BY:
CHARLES GOLDING,
Certified Shorthand Reporter

CERTIFIED COPY

EXHIBIT 452.003

weakness that we have right now in our republic is that legislators are not standing up to executives of their own party. Thank you, Leader Gallagher. And that's what we need to do. Thank you, Leader Gallagher. Assemblymember Carrillo, you are recognized.

MEMBER CARRILLO: Thank you, Mr. Speaker and members. I rise in support of ACA 8. This is a rough position that our country and our democracy is in these days. Leaders in D.C. and across the country have time and time again proven that they are willing to bend, stretch, and outright break the law if it means they are gaining more power. They are unashamedly trying to change the rules in the middle of the game, undermine our institutions. And chess flat cheat because they know that is what it will take for them to have a chance to win. I urge you to support this measure to give our constituents and our state a chance to fight with even odds. If at halftime one team decides they're going to play the second half with 15 players instead of 11, we can disagree and cry foul all we want, but we will Play the second half by the same old rules. With 11 players, we put our team and the people we're playing for at a huge disadvantage. And for

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what? Pride? Principle? No members. There is far too much at stake. They have made that painfully clear. Obviously, all of us on this floor would rather not be spending our time on this issue. There is certainly no shortage of pressing issues our constituents need us to address. But the unfortunate reality is that this president has manufactured this issue. And I would argue that there is no issue more pressing than ensuring Californians get the opportunity to play by the same rules as the rest of the country, even if we don't like what those rules are. Members, I urge you. I vote on AC8A. Thank you. Thank you, Assembly member Carrillo. Assembly member Mark Gonzalez, you are recognized.

MEMBER GONZALEZ: Thank you. Mr. Speaker and members, I rise today in strong support of ACA 8, the map that leads to you. Because this is not just about redistricting. It is about the survival of our democracy. I was born in McAllen, Texas, where voter suppression wasn't theory, it was reality. I saw neighbors turned away at the polls. I saw families silenced. I saw entire communities erased from the map. As a Latino, I know exactly what it looks like when

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politicians draw racist maps to hold power. When they decide some voices count and others do not. That memory never leaves you. And now I see Trump and his allies running the same playbook across Texas, across Florida, across this country. They cannot win on ideas. They cannot win on compassion. They cannot win on the merits. So what do they do? They change the rules. They rig the lines. And as our Texas Democratic colleagues said yesterday, they shield their racism with their party line. That is not patriotism. That is oppression with a ballot in its hand. This is an emergency. Trump has already shown us the length he will go. He sent ICE agents to the schools where our children learn, the churches we pray, the fields where we work to intimidate, to divide, and to silence dissent. He weaponized fear against immigrant families because he knows cruelty is cheaper than compassion. He tore families apart not to keep our country safe, but to score political points. California protects families. We do not divide them. And look at health care. Trump's big, ugly bill ripped $900 billion out of Medicaid just to line the pockets of the wealthy few. That is not reform. That is robbery. It

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threatens coverage for 3 million Californians, puts our seniors at risk, and sends rural hospitals to to their graves. Seniors, children, working families left with nothing. That's not policy. That is punishment. This is life and death. And yet, while they strip our people of health care while they weaponize immigration raids, while they tilt the scales of democracy. What they fear most is not us. What they fear most is the people. This is why ACA matters. This measure does not force maps on anyone. It gives California a choice. It lets the people hold the pen and draw their future. So I ask, why are Republicans so afraid of the people? Why are they so afraid of democracy itself? Every state in America should have independent redistricting. Every voter should have a choice. But until they do, California cannot and will not play the by rigged rules. If Texas wants to carve up districts to keep their wannabe dictator in power, we will not bow. If Florida wants to silence voters of color, we will not sit quietly. Because when democracy is attacked, silence is surrender. And California has never been and will never be a state that surrenders. California will fight back. Because this is not

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just about the maps. This is about dignity. This is about whether a Latino child in Texas, a black family in Florida, or an immigrant community in California has a voice in their own democracy members. History is watching. Our communities are watching. And they will remember not just what we said in this chamber, but whether we had the courage to act. ACA 8 is that act. It's not just a bill, it's shield. A shield against racist maps, a shield against voter suppression, A shield for democracy itself. It's not just a policy. It's a promise. A promise that democracy in California will not be dictated by the hand of tyranny, but written by the will of the people. I did not come to this floor, like many of you, with the polite request. I came with a call. A call to conscience, a call to courage and a call to history. Democrats fight to survive. Republicans fight to dominate. And when you fight to dominate, you stop at nothing. You cheat, you rig. You kill democracy in the process. Because democracy may bend, but here in California, it will not break. Not on our watch. Not on this floor, not in this state. Sisas Pueda, I respectfully ask for your. I vote. Thank you, Assemblymember Mark Gonzalez.

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Assemblymember Banta, you are recognized.

MEMBER BANTA: Thank you. Mr. Speaker and members, I rise today on behalf of the Beautiful people of 8018 of Oakland, Alameda and Emeryville, and as a proud co author of AC88, which would allow each and every Californian the opportunity to weigh in on our very future. The President and the Congressional majority have been so focused on implementing the deeply unpopular policies of Project 2025 that they forgot about the will and needs of the people that they serve. Since the policies of the federal administration and that majority are so incredibly unpopular, they decided they needed to rewrite the rules to win. From Texas to Florida to Indiana, this administration is pressuring governors to create new red districts to silence Americans nationwide. ACA 8 is a direct response to the life threatening policies that Trump and this majority Congress have taken. And this AC8 is our opportunity, the people's opportunity to empower Californians to neutralize that threat. Californians are witnessing for the firsthand the very devastating effects of this presidency. That's why we must treat this like

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Ex. 453

STATE OF CALIFORNIA ASSEMBLY

ELECTIONS COMMITTEE MEETING

AUGUST 19, 2025

TRANSCRIBED BY: MARY ANN SCANLAN, CSR

SCANLAN STONE REPORTERS

Certified Shorthand Reporters

P.O. Box 330366, San Francisco, CA 94133

o / 415.834.1114 f / 415.399.9266

e / info@scanlanstone.com w / scanlanstone.com

CHAIR PELLERIN: Yeah. Anything you could do to help Texas and Florida, let them know that that position would be greatly appreciated.

ASSEMBLY MEMBER TANGIPA: And I will say that time and time again. I've gone to advocate. But I also understand my position as a Legislator in the State of California is to the California people, and we can't react to what other states do, what everybody else does.

Because the way I think about it, seven months ago, there's a different person in the federal administration and in the White House. Cost of living was still $825,000 in the state. 25 percent of residents, 20 percent of residents still couldn't afford it.

So if we created our policies, which it feels like here in this legislative body is reacting to everybody else, we're doing a disservice to the people of California. That's why it's important.

So, yes, I agree with you and everybody else here. I wish we would continue to be the model to the rest of the nation that they should adopt ours.

But instead, it seems like we've forgotten the statement that was made by Michelle Obama that when they go low, we go high. But instead, now we've -- this -- the leadership here in the state says when they go low, we'll go lower. When they go authoritarian, we'll be more authoritarian.

CHAIR PELLERIN: And did you have more questions about the merits of the bill?

ASSEMBLY MEMBER TANGIPA: Yes, ma'am, I -- yes. I do.

CHAIR PELLERIN: Please go ahead and ask those.

ASSEMBLY MEMBER TANGIPA: You know, there are just so many empirical studies that are done on this. When we're looking at the maps, how did we take into consideration communities of interest?

You know, were they done to protect race, religion, all the ideologies that we have right now to make sure that we're protecting the voters of California? Was that done in that consideration?

SENATOR GONZALEZ: It's a partisan gerrymander. That's what we're talking about

here. This is partisan politics is what we're talking about here.

If Texas wants to -- again, if Trump gives them a call and says, literally, as he did with Governor Abbott, find me five seats, well, we're not going to sit back and just say, well, it's okay, find the five seats. And you know what? Six million people will be taken off of Medicare in California.

We are not going to stand by for that. So, no, this is completely partisan politics here. Obviously, that is happening. And we're doing so with the intent of supporting and bringing forward the quality of life issues that have been so affected by Californians, regardless of what your party affiliation, regardless of where you live in the state.

ASSEMBLY MEMBER TANGIPA: Do you know if the maps were made sure -- to make sure that we were protecting communities of interest?

Because it's stated in the bill. It states that these maps --

MR. BRENNAND: Yes.

ASSEMBLY MEMBER TANGIPA: -- were created to protect communities of interest, and it defines that, too.

MR. WILLIS: Yeah, I'll just go back to what has been said several times, which is this map -- the main architecture of this map is from the Redistricting Commission.

And the Redistricting Commission issued a voluminous report and maps all about how they followed that, or how they followed the Voting Rights Act, how they followed communities of interest --

ASSEMBLY MEMBER TANGIPA: When you say --

MR. WILLIS: -- how they followed geographic integrity.

ASSEMBLY MEMBER TANGIPA: Just for clarity for me, you mean the Redistricting Commission --

MR. WILLIS: Right.

ASSEMBLY MEMBER TANGIPA: -- on the independent -- and you [illegible]

MR. WILLIS: That's correct. That's right.

Ex. 513

In the Matter Of:

DAVID TANGIPA

vs

GAVIN NEWSOM

PAUL H. MITCHELL

December 10, 2025

CERTIFIED COPY

UNITED STATES DISTRICT COURT

FOR THE

CENTRAL DISTRICT OF CALIFORNIA

--o0o--

DAVID TANGIPA, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 2:25-cv-10616-JLS-WLH-KKL
	)	
GAVIN NEWSOM, in his official capacity as the Governor of California, et al.,	)	
	)	
Defendants.	)	
	)	

CERTIFIED COPY

--o0o--

Videoconferencing Videotaped Deposition of

PAUL H. MITCHELL

Wednesday, December 10, 2025

--o0o--

ARRAY - JOB NO. 103797

Certified Shorthand Reporters

Reported by: LINDA J. HART, CSR License 4357, RMR/CRR

question and he'll answer.

THE WITNESS: Yes. Sorry. Yes, she was.

MS. HAMILL Q: So Liz Stitt was in

DAVID TANGIPA vs GAVIN NEWSOM
Paul H. Mitchell on 12/10/2025

communication with you regarding this project?

A Yes.

Q Which means the Proposition 50 maps?

A Yes.

Q Are there any other members of the Redistricting Partners team?

MR. MANOLIUS: Of any kind?

MS. HAMILL: Let's say from July 2025 to the present.

MR. MANOLIUS: Okay.

THE WITNESS: Can I ask you a clarification.

MS. HAMILL: Yes, you may.

A Okay. So the fact is Liz -- Redistricting Partners has no employees. Liz Stitt was the last employee so when you say Redistricting Partners' team can you clarify what you mean by that?

Q Have you heard of Evan McLaughlin?

A Yes.

Q And Joe Armenta?

A Yes.

Q And Jacob Thomas Fisher?

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A Thompson.

Q Thompson-Fisher? 10:23:57

A Yes. 10:23:59

Q Stacey Reardon? 10:23:59

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A Yes. 10:24:00

Q And those people worked with you to help you draw maps? 10:24:01 10:24:02

MR. MANOLIUS: Objection, compound. You can answer. 10:24:04 10:24:06

MR. WOODS: Vague. 10:24:07

THE WITNESS: Do you want to split out the people a little bit? The first three do but Stacey Reardon didn't help draw any maps. 10:24:07 10:24:09 10:24:15

MS. HAMILL Q: And did you direct their work? 10:24:21

A Yes. 10:24:23

Q So is it fair to say that you drew the Prop 50 maps? 10:24:25 10:24:30

MR. MANOLIUS: Objection, calls for information that's privileged under legislative privilege. I instruct you not to answer. 10:24:30 10:24:32 10:24:34

MS. HAMILL Q: And in asserting that legislative privilege I need to understand the circumstances under which you're asserting it. So were you under contract with the California Legislature to draw the Proposition 50 maps? 10:24:36 10:24:38 10:24:43 10:24:47 10:24:50

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MR. MANOLIUS: Objection, vague as to time. 10:24:52

MS. HAMILL: Ever, at any time. 10:24:55

A No. 10:24:58

MS. HAMILL Q: Were you under contract with 10:24:58

DAVID TANGIPA vs GAVIN NEWSOM
Paul H. Mitchell on 12/10/2025

any particular legislator to draw the Proposition 50 10:25:00

maps? 10:25:04

MR. MANOLIUS: Objection, vague as to under 10:25:04

contract. You mean in a paid capacity, is that what 10:25:06

you're asking? 10:25:08

MS. HAMILL: Under any contract, paid or 10:25:09

unpaid. 10:25:11

MR. WOODS: Objection, calls for a legal 10:25:14

conclusion. You can answer if you can. 10:25:16

MR. MANOLIUS: And vague. 10:25:17

A I don't know what an unpaid contract means, so 10:25:18

if you're saying was I -- I was not paid by anybody in 10:25:23

the legislature to draw the map. 10:25:30

MS. HAMILL Q: Did you have an agreement with 10:25:32

someone in the legislature to draw the Proposition 50 10:25:33

maps? 10:25:37

MR. MANOLIUS: Objection, vague as to the term 10:25:37

agreement. 10:25:38

A If you can define that. 10:25:39

MS. HAMILL Q: You want me to define 10:25:41

agreement? 10:25:42

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A Well, I mean, is agreement a direction or is 10:25:43

agreement a passive you're the one doing it. 10:25:47

Q Did anyone in the Legislature ask you to draw the Proposition 50 maps? 10:25:51 10:25:54

DAVID TANGIPA vs GAVIN NEWSOM
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MR. MANOLIUS: Objection, calls for information that's protected under the legislative privilege. Don't answer. 10:25:58 10:25:59 10:26:02

MS. HAMILL Q: Can you please explain to me on what grounds Mr. Mitchell is invoking this privilege? He is not a member of the Legislature so I am very confused as to how this applies to his work. 10:26:04 10:26:06 10:26:11 10:26:14

MR. MANOLIUS: I've read the cases so no, I am not going to explain it here or we've made our objection. 10:26:17 10:26:23 10:26:28

MS. HAMILL: There's -- we are entitled to a factual explanation of how this privilege would even remotely apply to this work. We don't have any understanding that Mr. Mitchell was working for the Legislature, is a legislator or would be in any way entitled to invoke this privilege. 10:26:29 10:26:31 10:26:34 10:26:37 10:26:39 10:26:44

MR. MANOLIUS: We disagree with you. He is -- his, his work went to the Legislature and so in that regard the provide earrings of that work and of any comments to him are, their comments are protected under the Legislature under the legislature. 10:26:46 10:26:53 10:27:04 10:27:09 10:27:14

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MS. HAMILL: The comments. When did your work 10:27:18

conversation reflected in this transcript?

MR. MANOLIUS: Objection, vague, compound, overbroad. Quite a number of pages. You can look through them too.

THE WITNESS: Yes, I recognize them.

MS. HAMILL: I am going to ask counsel to please stop with the speaking objections.

MR. MANOLIUS: I'll make my objections. Thanks.

MS. HAMILL: You're welcome.

Q So the Zoom, the video from from this Zoom discussion is no longer publicly available. Do you have any idea why that is?

MR. MANOLIUS: Objection, lacks foundation. You can answer.

THE WITNESS: I didn't know that it was publicly available, so I don't have any response. I don't have any interaction with -- no.

MS. HAMILL Q: At any time did you personally take any action to get the video taken off of the public domain?

A No.

Q Do you recall telling HOPE that Prop 50 would increase Latino voting power?

A No.

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Q I'm going to turn your attention to page 23, line 24 through page 24 line one. 01:31:19 01:31:53

A Uh-huh. 01:32:33

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Q Can you read that out loud for me, please, starting at line 24 on page 23? 01:32:34 01:32:37

A I'll trust that this is the right transcript, but -- and I started listing out this concept of drawing a replacement majority/minority Latino in the middle of Los Angeles, that was the number one thing that I first started thinking about because of something that I worked with HOPE on in the last redistricting process. 01:32:40 01:32:44 01:32:46 01:32:50 01:32:55 01:32:57

Q Do you remember saying that? 01:33:00

A I recall speaking to it. I don't remember saying those exact words. 01:33:01 01:33:05

Q Were you being truthful when you said that? 01:33:06

A I was being -- 01:33:09

MR. MANOLIUS: Objection. Calls for legal conclusion, argumentative. You can answer. 01:33:10 01:33:14

THE WITNESS: I was being truthful in that when we first started working on this this was a map that was already drawn. 01:33:17 01:33:22 01:33:24

MS. HAMILL Q: When you say this, are you referring to the Proposition 50 map? 01:33:27 01:33:28

A This map that's this map, this map, I mean a map that puts -- when I say I first started thinking 01:33:30 01:33:35

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about it because of something that I worked with HOPE on in the last redistricting process, there was a map associated with that work in 2021, so I knew that that map existed and I knew that that map creates an additional democratic seat in the middle of Los Angeles.

Q Are you saying you drew a map with HOPE in 2021?

A No, I just knew there was one that existed.

Q Okay.

A And that had been advocated by Equality California, environmental protection groups and HOPE, so I knew that there was already a map on the shelf.

And so on the first thing I can think of is, hey, I know one thing that's easy to do, that's why I was expressing to them there was a, hey, I know something that will pick up a democratic seat.

Q Did you work with HOPE at all in 2021 on that map?

A I don't recall. I know it existed.

Q How often has HOPE sent you map proposals?

A Never any. Potentially, I mean, I don't want to, I don't want to say -- let me para -- let me rephrase that.

I don't recall them ever sending me a map proposal. That isn't the core of what they do as an

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organization.

Q So how does your relationship work? Would they express a desire for something and you would provide them with a draft map --

MR. MANOLIUS: Objection.

THE WITNESS: In 2021?

MR. MANOLIUS: Wait. Objection, vague as to time. I am not sure during what process you mean.

MS. HAMILL: At any time.

THE WITNESS: So in 2021?

MR. MANOLIUS: At any time except, excuse me -- objection -- the Prop 50 map drawing process, which I instruct you not to answer about.

THE WITNESS: Yes. Very readily available to anybody who wanted to look is in 2021. HOPE and a number of groups were advocating for a map that would not remove a district from Los Angeles, because that's what the commission chose to do in 2021.

They went from 53 to 52 districts and they had a question, how are we going to do this? Are we going to do this by starting from a scratch map and just letting everything fall where it is or are we going to just take a map out of L.A. where they're the slower growing portion of the state and it makes our job easier just to take a district out of L.A.

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Q -- is that correct? 01:46:24

A Yeah. 01:46:24

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Q Is that a fair thing to say? 01:46:25

A Yeah. 01:46:26

Q Okay. Now we're going back to the transcript, page 24, line 25. You say, "Secondly, take the district that was called LB north, which is now the Robert Garcia district, take that district to the south through Seal Beach into Huntington Beach, making a Latino-influenced district at 35 percent Latino by voting age population." 01:46:26 01:46:30 01:46:36 01:46:40 01:46:44 01:46:47

Do you remember saying that? 01:46:51

A I remember saying something like that. 01:46:53

Q And that doesn't perfectly reflect point two on the second page of the letter that's marked as Exhibit 10, does it? 01:46:55 01:46:57 01:47:00

MR. MANOLIUS: Objection, lacks foundation, vague. You can answer. 01:47:02 01:47:05

THE WITNESS: It is off by a few words here and there. 01:47:08 01:47:11

MS. HAMILL Q: Do you think perhaps when you were speaking at this HOPE presentation you were ad-libbing a bit from the letter? 01:47:12 01:47:13 01:47:16

A Potentially. 01:47:18

MR. MANOLIUS: Objection, calls for speculation. 01:47:19 01:47:20

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THE WITNESS: Potentially. I was reading as I'm talking and so there was a little bit, and that might be why there was two words in the first bullet point. I don't know. 01:47:22 01:47:23 01:47:30 01:47:33

MS. HAMILL Q: Okay. And so that was your starting point what we just went over you've testified, that that was the start point that you had for Proposition 50; correct? 01:47:34 01:47:44 01:47:47 01:47:50

MR. MANOLIUS: Objection, don't answer it. Calls for information protected by the legislative privilege. 01:47:51 01:47:53 01:47:55

MS. HAMILL Q: That's what you told HOPE, at least? 01:47:57 01:48:00

MR. MANOLIUS: Um, objection. Misstates the testimony, vague. You can answer. 01:48:02 01:48:05

MR. WOODS: Join. 01:48:07

THE WITNESS: What I told HOPE was that the off the shelf, the first thing available to us in trying to create an additional democratic seat was to utilize a map that had already been drawn that was being advocated for them before the commission, that's what I articulate here. 01:48:09 01:48:14 01:48:16 01:48:20 01:48:23 01:48:26

MS. HAMILL Q: Did you tell HOPE that this creating a Latino majority district and putting back in this district was the starting point, because you were 01:48:27 01:48:29 01:48:33

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trying to convince them to vote for Proposition 50? 01:48:35

MR. MANOLIUS: Objection. I instruct you not 01:48:39

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to answer, to the extent that it implicates your Prop 50 01:48:41

work, legislative privilege, so I instruct you not to 01:48:45

answer. 01:48:48

MS. HAMILL Q: Did you tell HOPE that this 01:48:48

letter we've marked as Exhibit 10 was your starting 01:48:58

point, because that was the truth and that's how you 01:49:01

started drawing the Proposition 50 map? 01:49:03

MR. MANOLIUS: Same objection. Legislative 01:49:06

privilege. 01:49:08

MS. HAMILL Q: Going back to the transcript, 01:49:09

which is marked as Exhibit 9, page 25, line six, you 01:49:10

say, "That two bullet points was the first thing we did 01:49:16

in drawing the new map. We essentially reversed the 01:49:19

Redistricting Commission's decision to eliminate the 01:49:23

Latino district from L.A., the old Ed Roybal district, 01:49:26

Lucille Roybal-Allard district, the first Latino 01:49:32

majority/minority district in the country, the first 01:49:36

Latino member of Congress in the country." 01:49:39

Do you remember saying that? 01:49:43

A I remember saying something like that, yeah. 01:49:44

Q Is it true? 01:49:46

MR. MANOLIUS: Objection. To the extent it 01:49:47

calls for legislative privilege and information, I 01:49:49

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privilege?

A Yes, upon advice of my counsel.

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MS. HAMILL: Thank you.

MR. MEUSER: Okay. I'll switch places with you.

MR. WOODS: If you want to.

THE REPORTER: 33 minutes left.

MR. WOODS: I'll be very very quick.

EXAMINATION

By: S. CLINTON WOODS, Attorney at Law, counsel on behalf of the Defendants:

Q Good evening, Mr. Mitchell. I may have introduced myself off the record. I am not sure if I have.

My name is Clinton Woods. I am a Deputy Attorney General from the State of California representing the State defendants in this matter.

I just have a few questions and I want to be very clear that in my questions I am not asking about your work on Prop 50. I am focusing on after you submitted the maps or Redistricting Partners submitted the maps.

I am not asking for any conversations or communications or anything that you would have learned from your work with Prop 50, but as an individual

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citizen, a California citizen. 06:24:52

Would it be fair to say that you wanted Prop 06:24:56

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50 to pass? 06:25:01

A Yes. 06:25:02

Q Okay. Did you agree with the partisan aims of 06:25:03

Prop 50? 06:25:08

A Yes. 06:25:09

MR. MANOLIUS: Objection, vague as to the term 06:25:10

"partisan aims," but I think he understood the question 06:25:12

so -- 06:25:14

THE WITNESS: I agreed to do it only because 06:25:15

of what Texas did. Normally, I wouldn't agree to 06:25:16

partisan redistricting because in this case, because of 06:25:19

the circumstances, I did agree to it. 06:25:21

MR. WOODS Q: Understood. Are you a register 06:25:24

democrat? 06:25:26

A Yes. 06:25:28

Q Do you consider more democrats in Congress to 06:25:28

be a good thing? 06:25:31

A Yes, particularly right now. 06:25:32

Q Okay. Did you vote for Prop 50? 06:25:35

A I did. 06:25:37

Q Okay. Would it be fair to say that after you 06:25:38

submitted the map that the public interviews that you 06:25:41

did that counsel has been talking about, whatever other 06:25:45

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public interviews or statements you might have made were done with the aim of convincing people to vote for Prop 50?

A Clearly that would have been one of the aims, absolutely.

Q Okay. Because you agreed with the partisan aims of Prop 50; right?

A Yes.

Q After you submitted the maps, I am a California citizen, I am guessing based on your testimony so far, and please correct me if I'm wrong, that you paid attention to the Prop 50 campaign?

A Quite a bit, yes.

Q Okay. Did you see any political advertisements about Prop 50?

A Quite a lot, yes.

Q Okay. Where did you see them?

A Mostly on social media. I didn't see the YouTube ads because I paid for the one where I don't have to see the ads.

Q Okay. So did you see any ads on television?

A I did see some ads on television.

Q Okay. I am a sports fan so I saw a lot of ads both for and against Prop 50 on every Warriors game that I watched. Did you see

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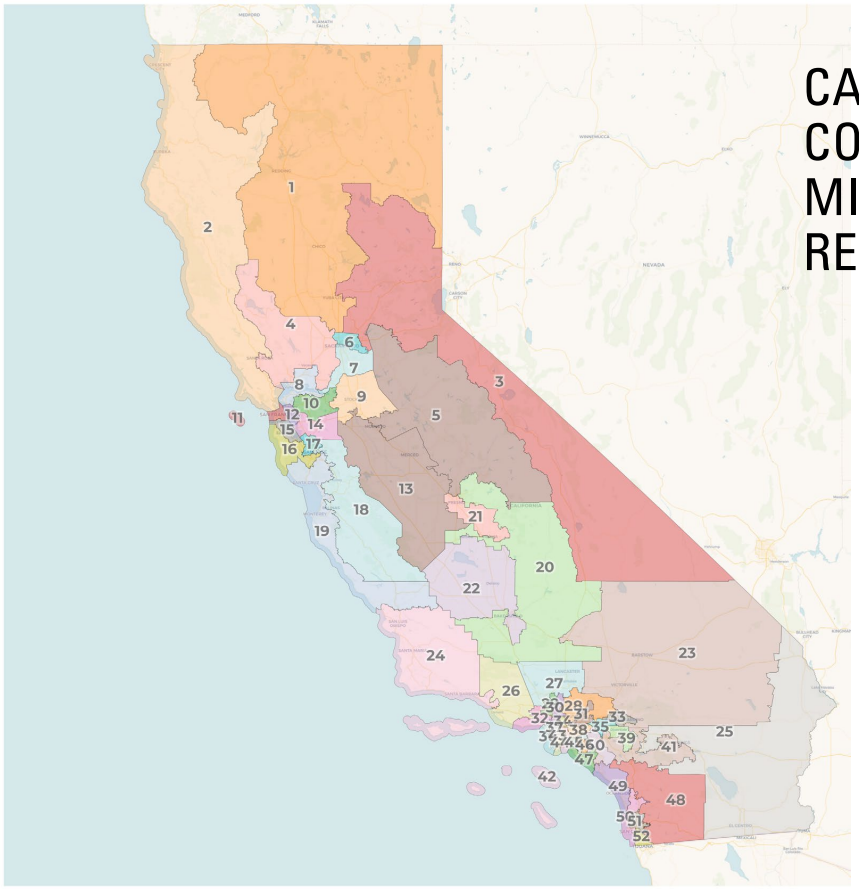
Ex. 523

California Congressional
Adopted 2021 - 2025 Data

REDISTRICTING PARTNERS



CALIFORNIA CONGRESSIONAL MID-DECADE REDISTRICTING

REDISTRICTING PARTNERS

CA MID-DECADE REDISTRICTING

The effort undertaken do adjust the Congressional District Boundaries adopted by the California Citizens Redistricting Commission keeps fidelity with the 2021 Process

- **US Constitutional / Federal Law** – Equal Population / VRA
- **Contiguity** – literal and functional criteria
- **Communities of Interest** - Must preserve identified communities of interest when possible.
- **Cities and Counties** - Respect city and county boundaries
- **Compactness** - Districts should not bypass nearby populations to grab distant ones.

REDISTRICTING PARTNERS

CA MID-DECADE REDISTRICTING

Adjustments to the California Congressional Districts are built from multiple sources.

- Actual 2021 CRC Commissioner testimony on draft maps or instructions for mapping options given to staff
- Public maps presented to the commission
- Public testimony to the commission
- Draft or completed 2021 or 2011 Commission maps.

REDISTRICTING PARTNERS

STRONG METRICS

This map is a reflection of state and federal requirements and California values. This is not a twitter map or an over-reach.

- This plan currently splits only 57 cities, which is fewer than the commission drawn plan.

- Using Polsby Popper as a metric for compactness, the minimum and maximum values are better in the public submission than the current commission plan. In other metrics, including Reock, Schwarzberg and Alternate Schwarzberg, the plan's least-compact districts are more compact than the commission plan.

REDISTRICTING PARTNERS

MINIMIZE DISRUPTION

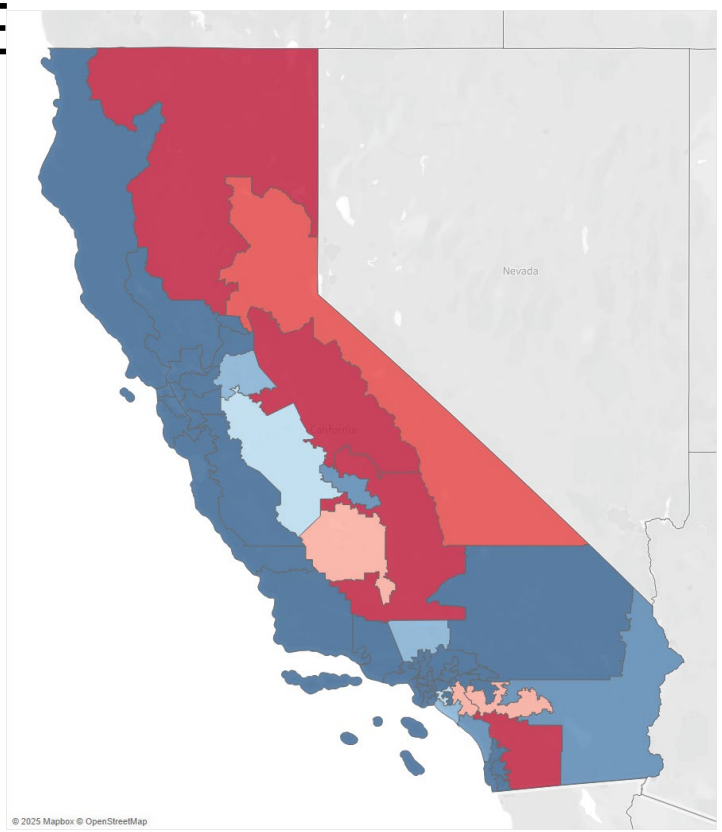
These maps are an ADJUSTMENT of the existing Citizens Redistricting Commission drawn maps.

- 8 districts are not touched at all, another 20 have less than 10% change.
- No changes were made to the map that were not consistent with the goals set forward by the delegation – pushing back on the mid-decade redistricting plans from Texas and other states.

REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

- The old map had several swing, likely and lean Democratic contests, with seven seats that Democrats won in 2018 and have fought to hold and/or win back in subsequent elections.

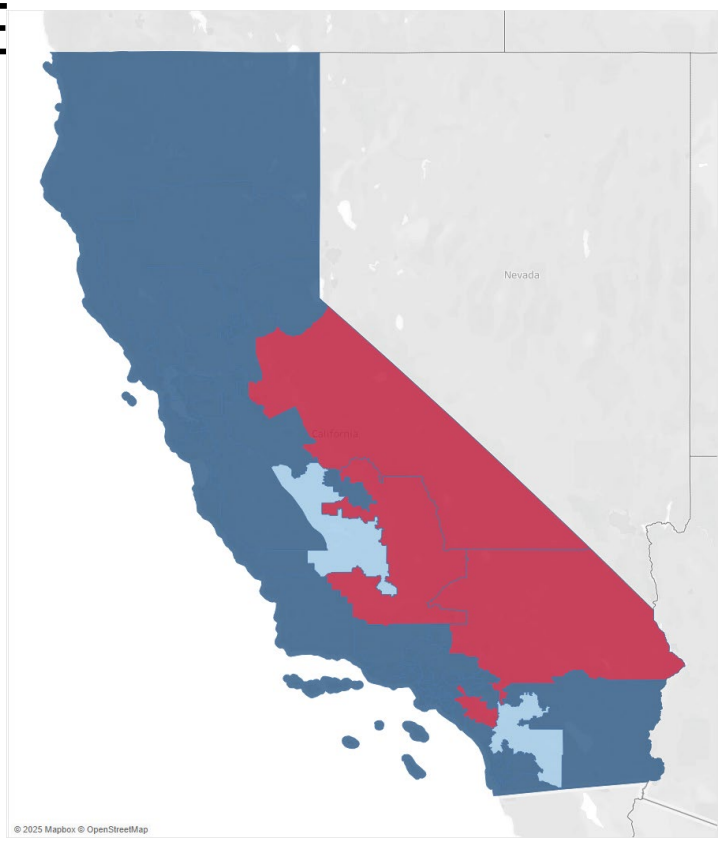


REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

- The old map had several swing, likely and lean Democratic contests, with seven seats that Democrats won in 2018 and have fought to hold and/or win back in subsequent elections.

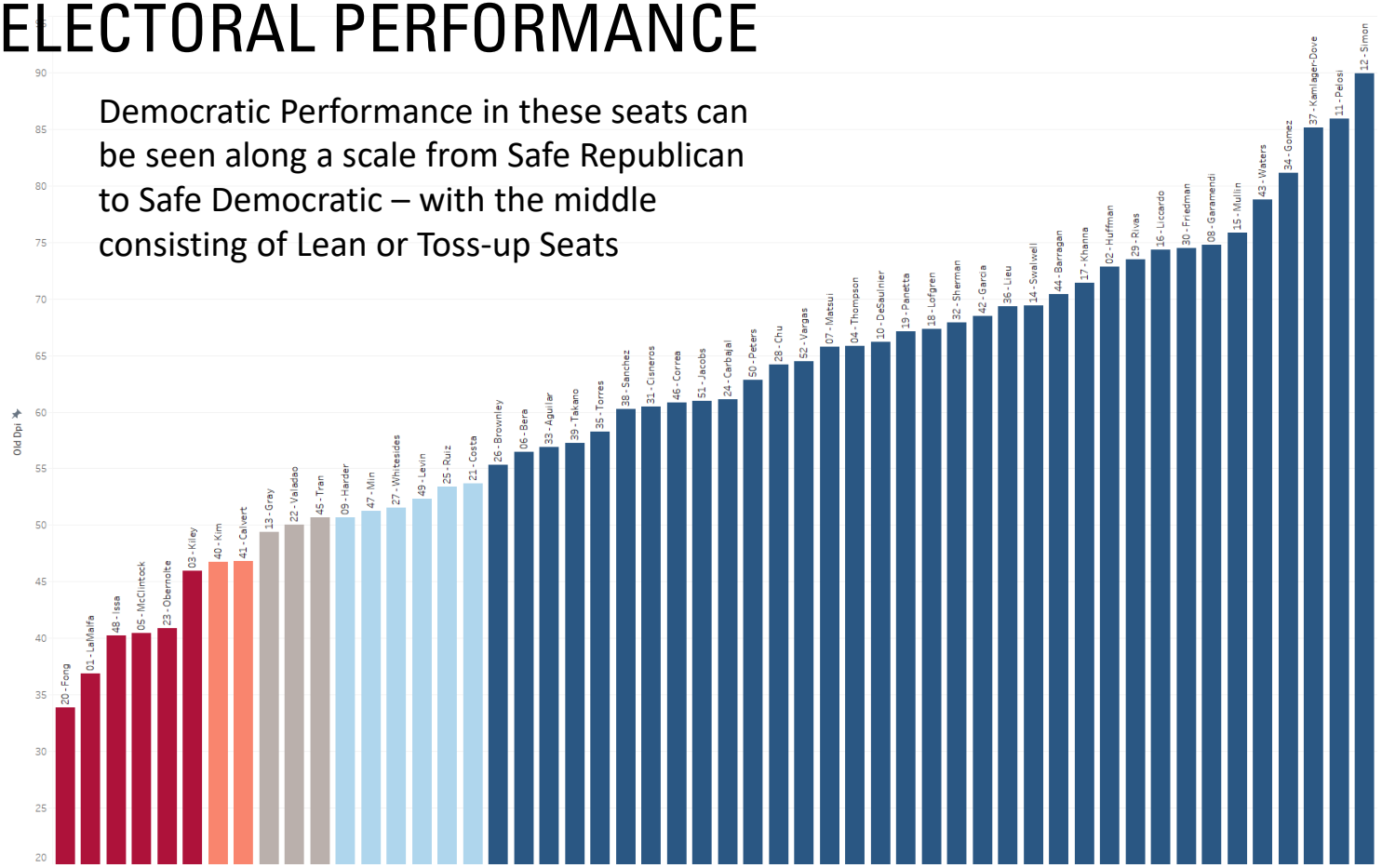
- The new map puts California on track to win 48 Democratic seats in 2026



REDISTRICTING PARTNERS

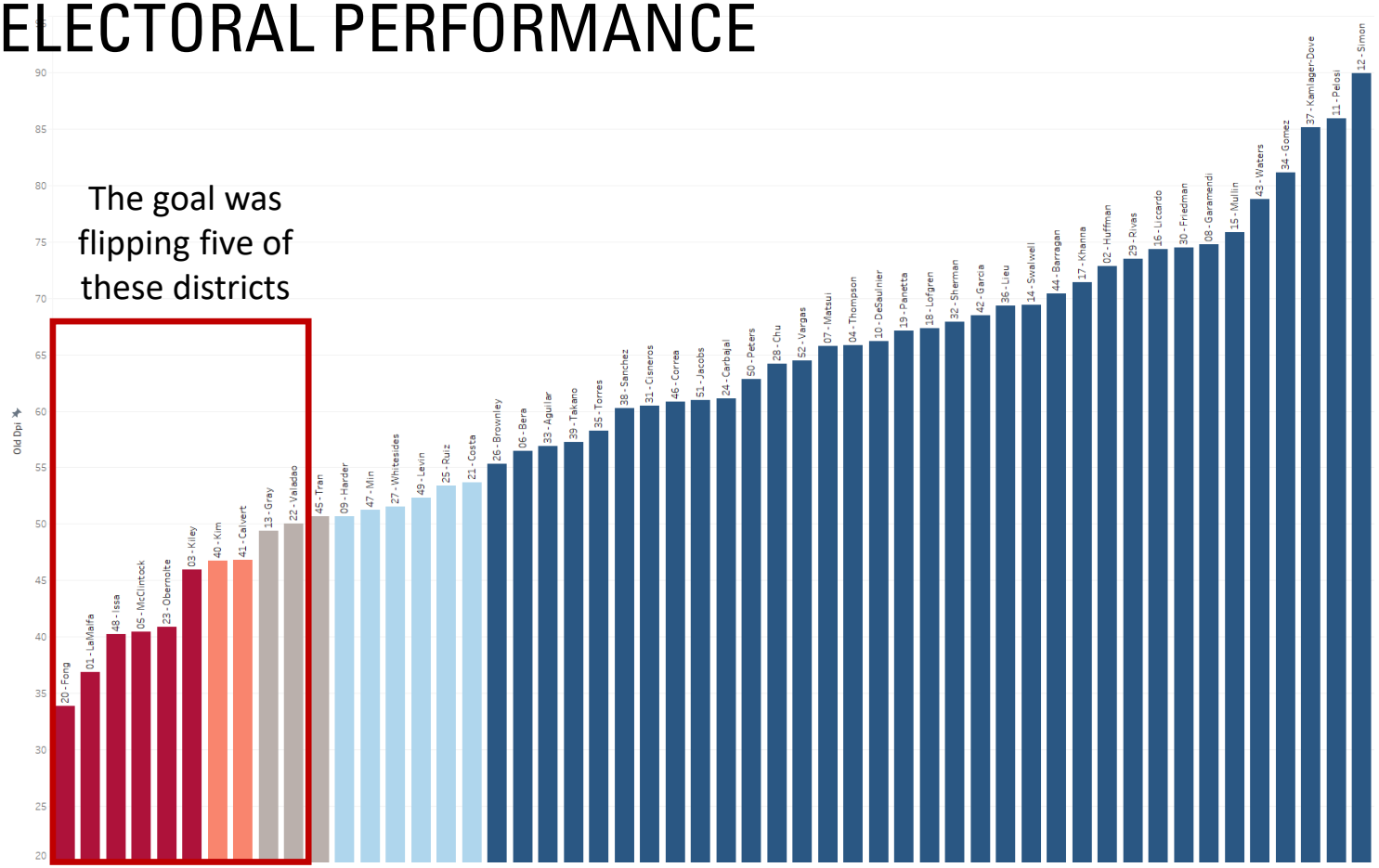
ELECTORAL PERFORMANCE

Democratic Performance in these seats can be seen along a scale from Safe Republican to Safe Democratic – with the middle consisting of Lean or Toss-up Seats



REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE



REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

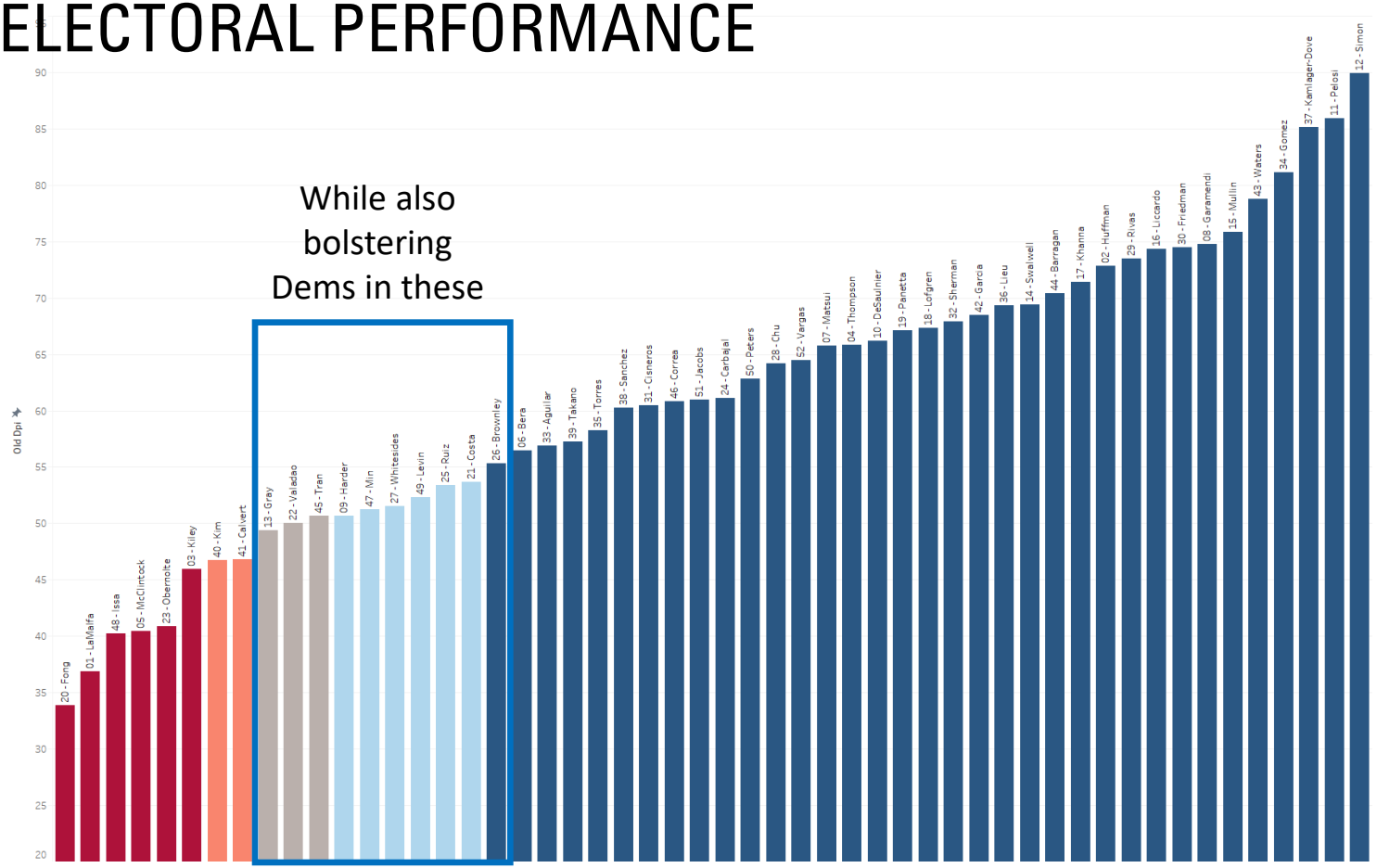
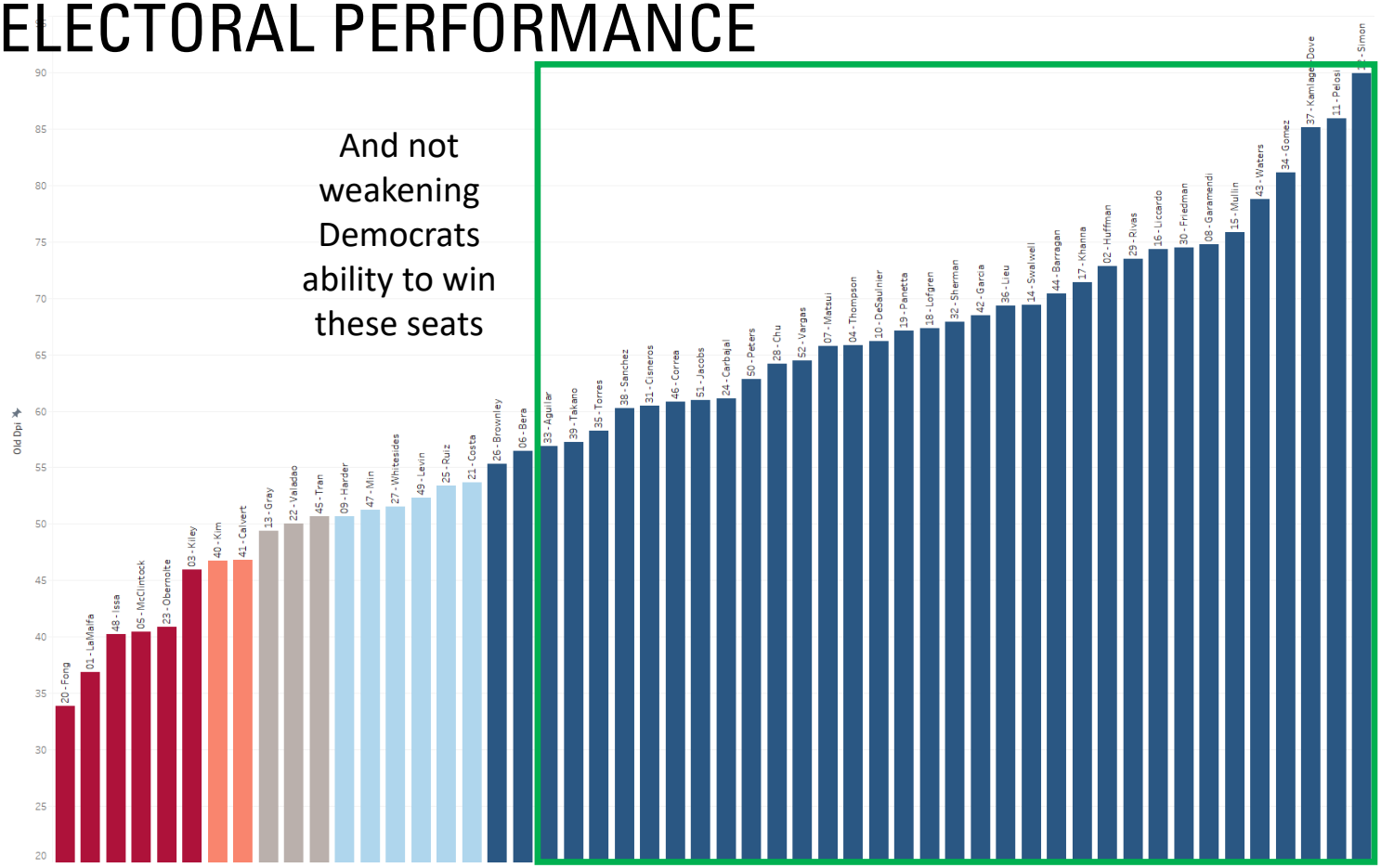


Exhibit 523 - 10

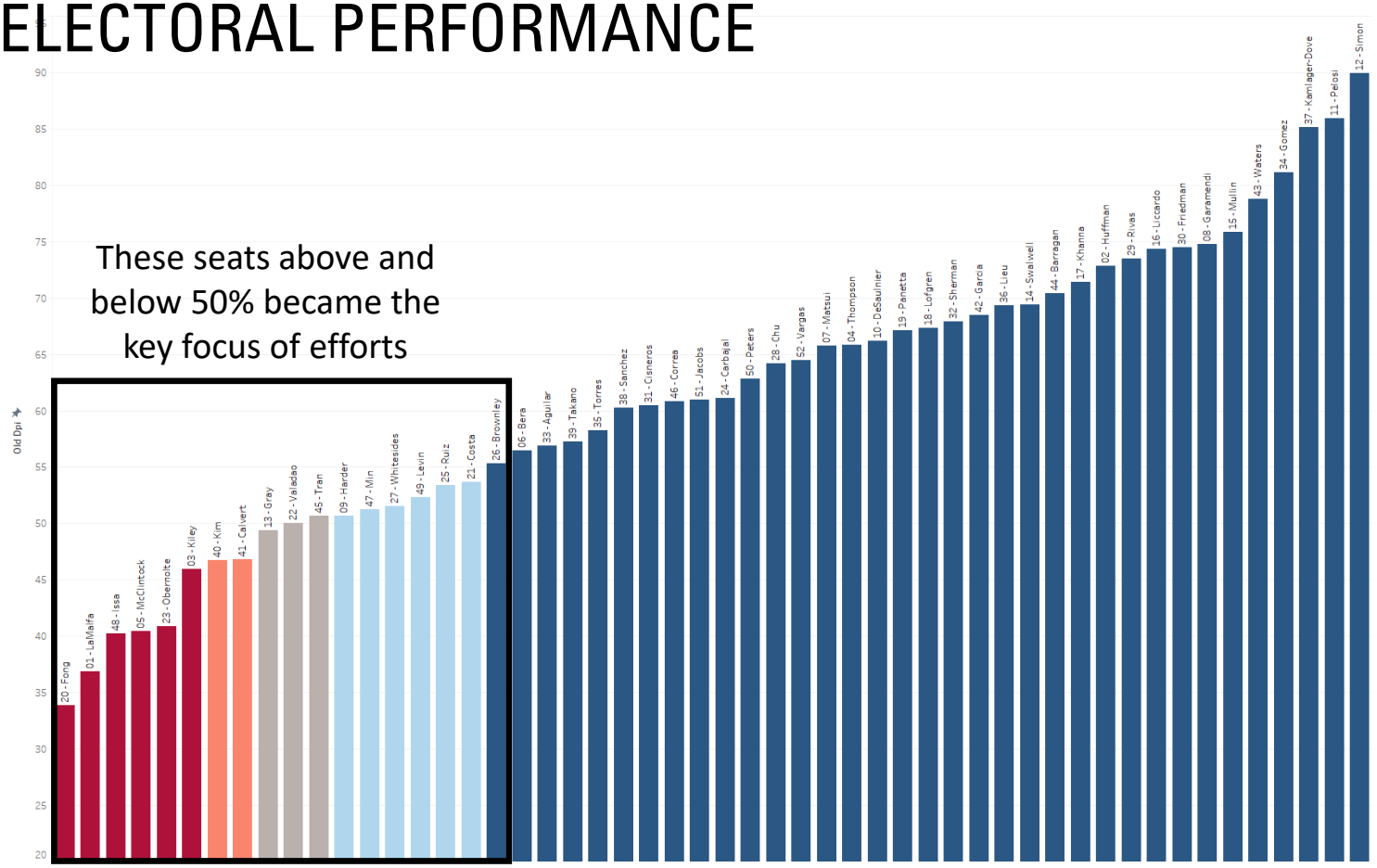
REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE



REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

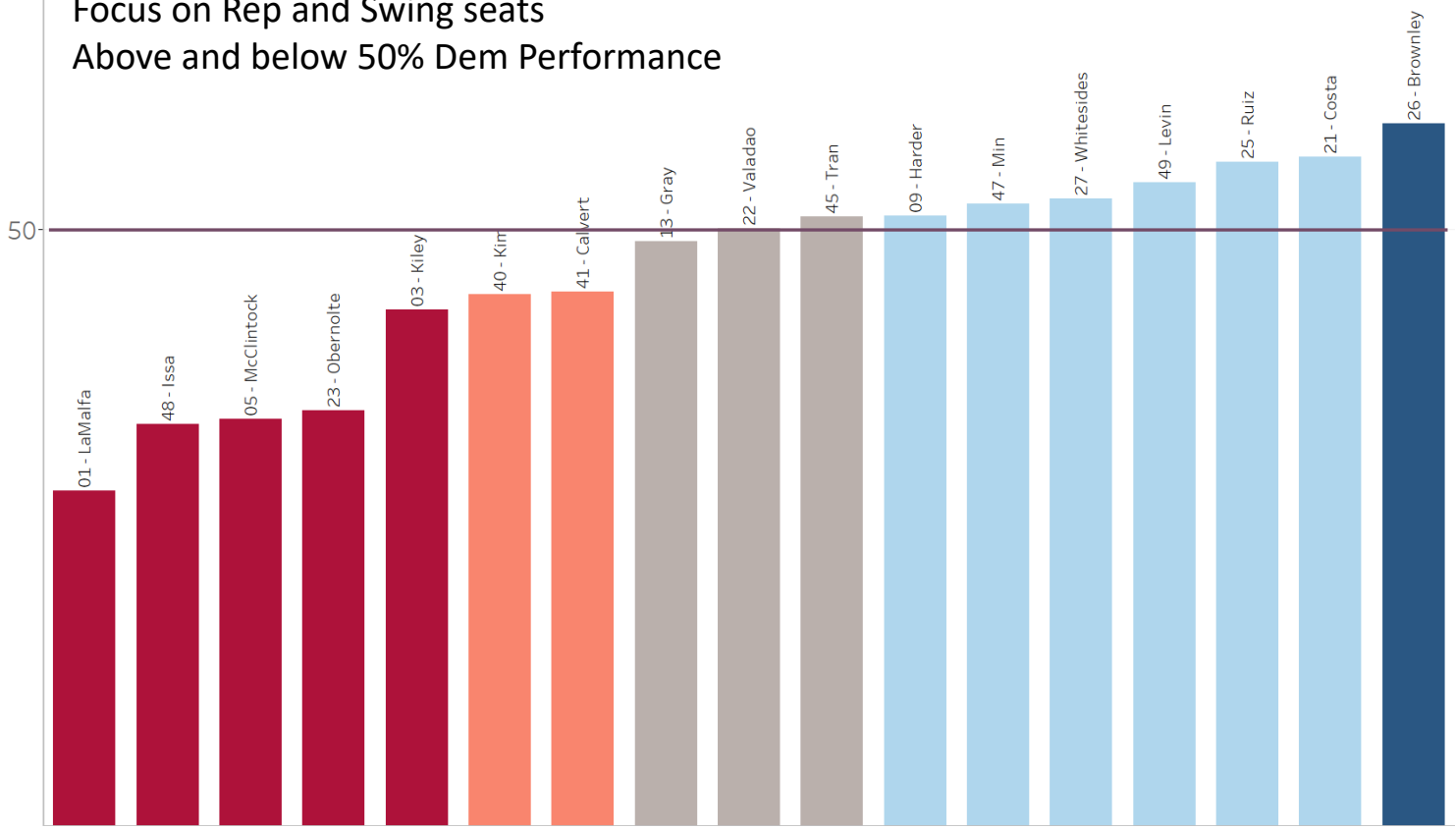


REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

Focus on Rep and Swing seats

Above and below 50% Dem Performance



REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

Focus on Rep and Swing seats

Above and below 50% Dem Performance

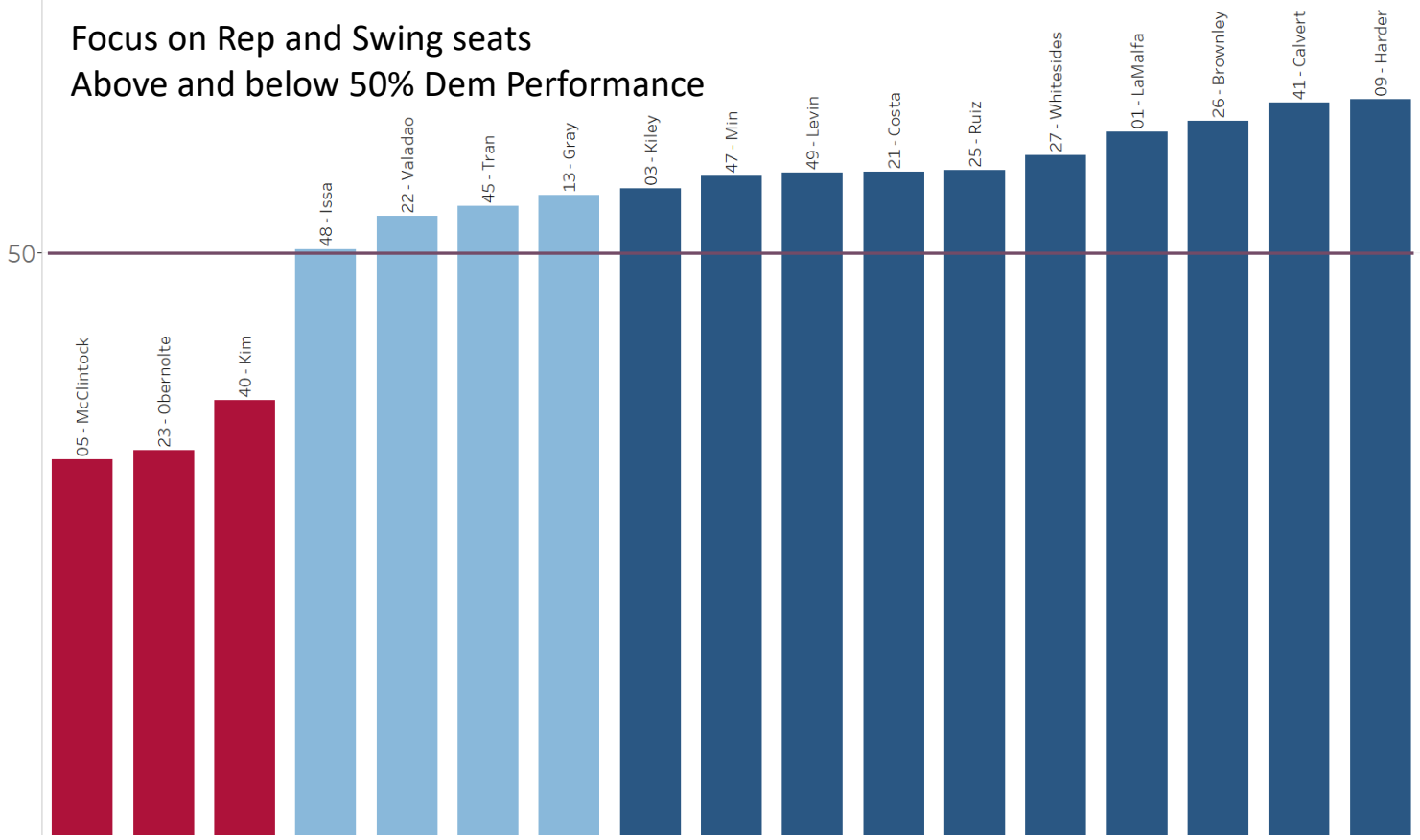


Exhibit 523 - 14

California Congressional
2021 Adopted Plan

REDISTRICTING PARTNERS

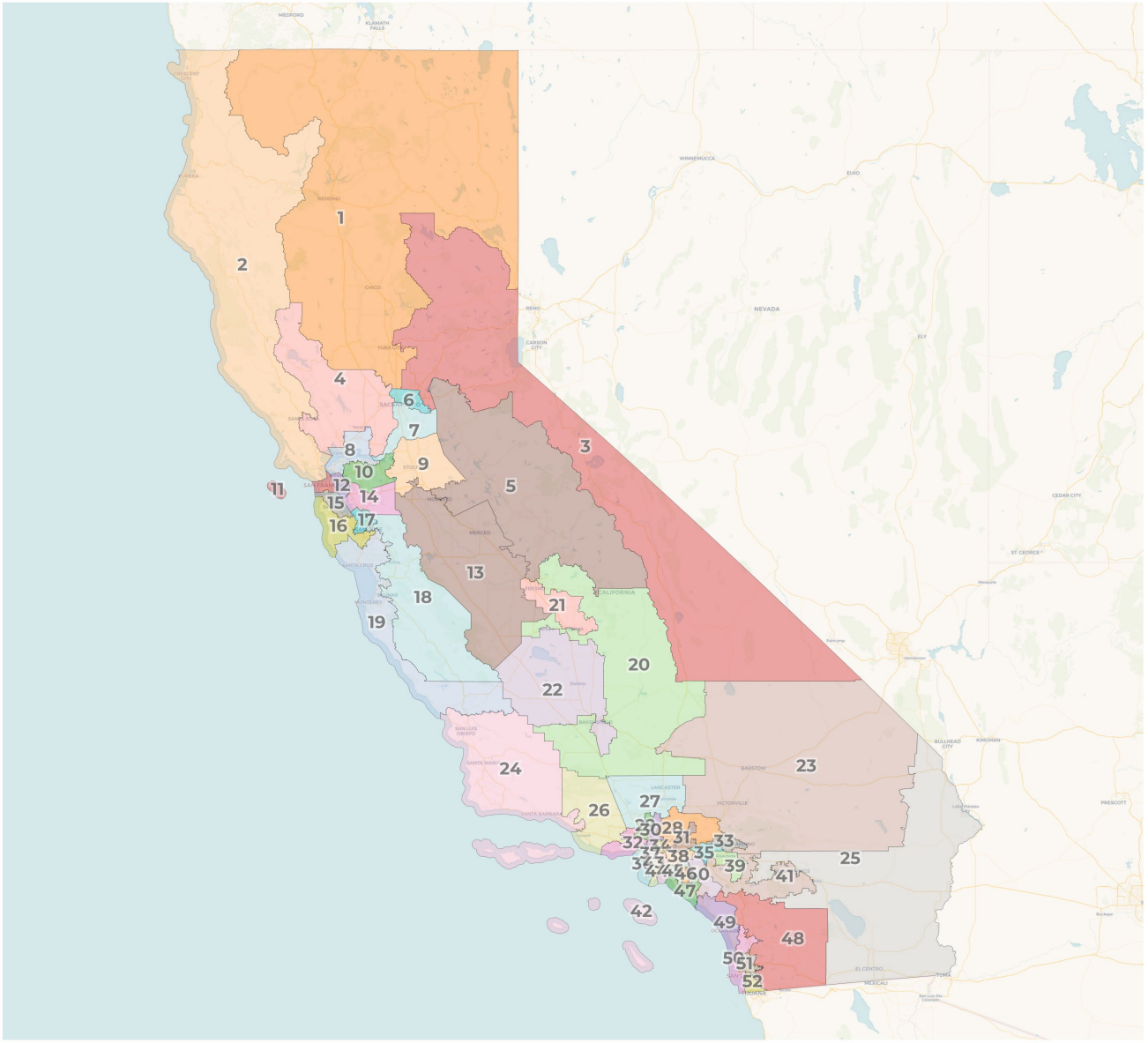


Exhibit 523 - 15

California Congressional
Public Submission

REDISTRICTING PARTNERS

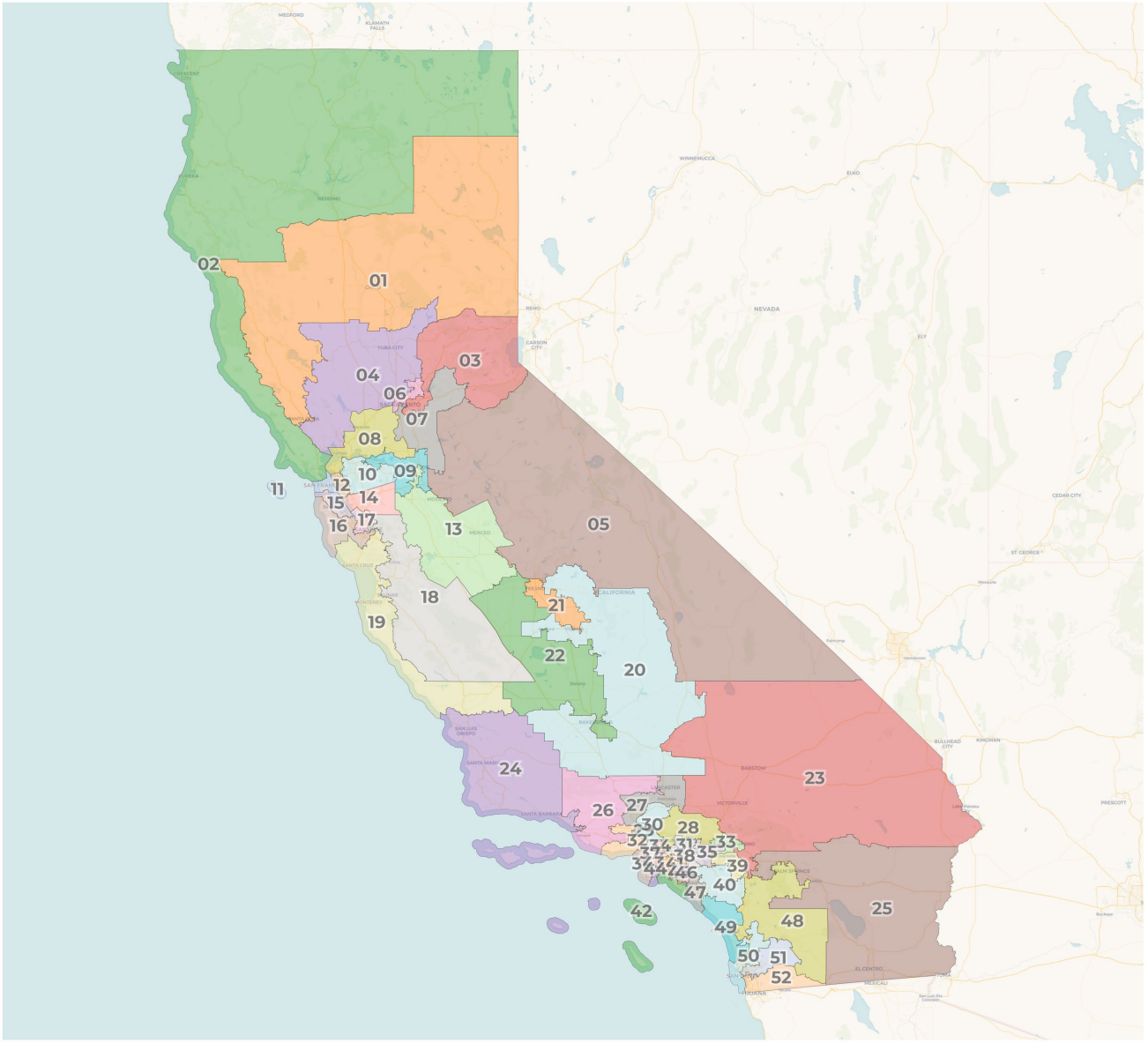


Exhibit 523 - 16

REDISTRICTING PARTNERS

CA Congressional

2021 CRC Lines - Northern California

Exhibit 523 - 17

REDISTRICTING PARTNERS

CA Congressional
Draft Plan H4 - NorCal

Exhibit 523 - 18

CA Congressional
2021 CRC Lines - Sa

REDISTRICTING PARTNERS

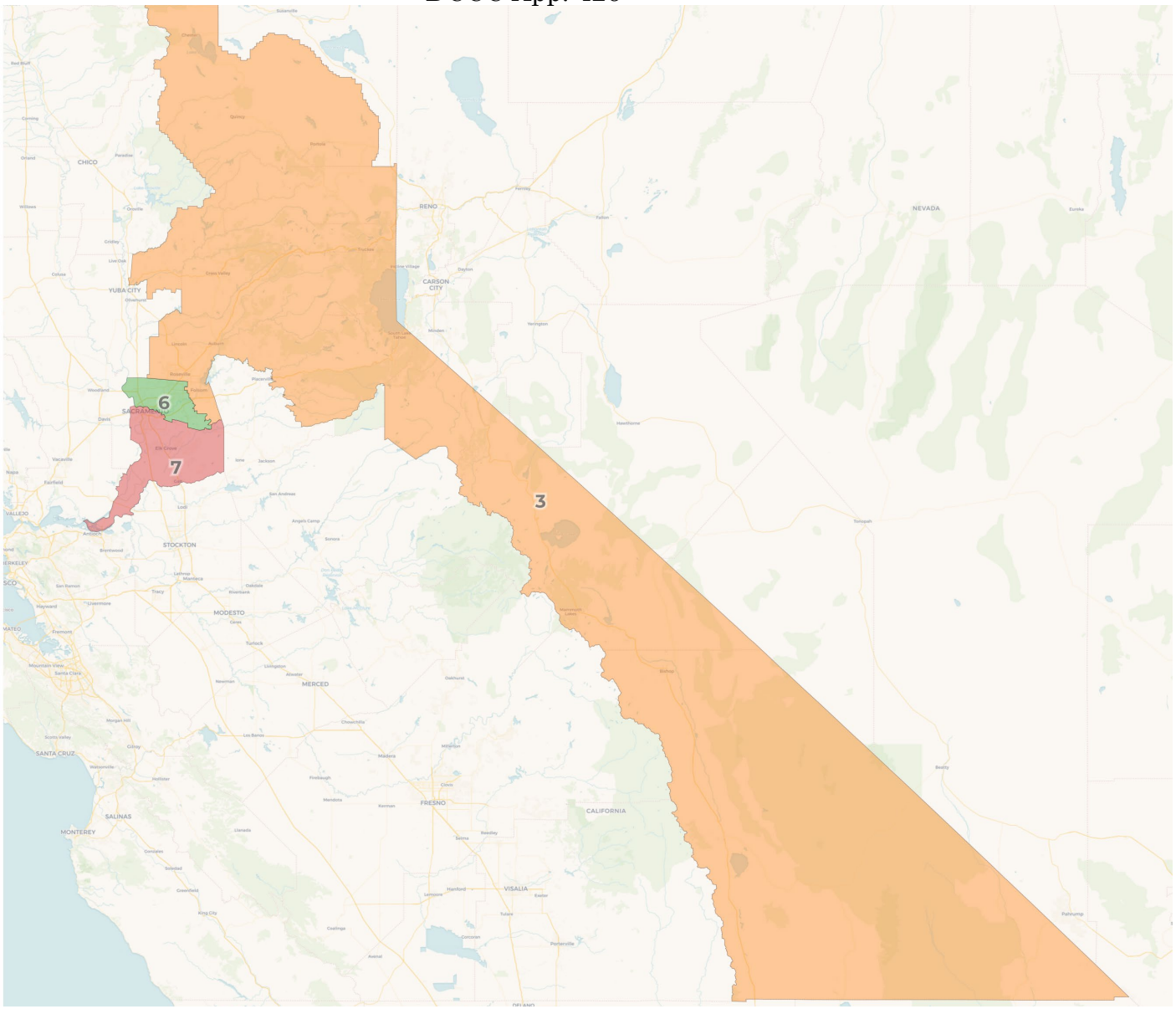


Exhibit 523 - 19

CA Congressional
Draft Plan H4 - Sac Metro

REDISTRICTING PARTNERS

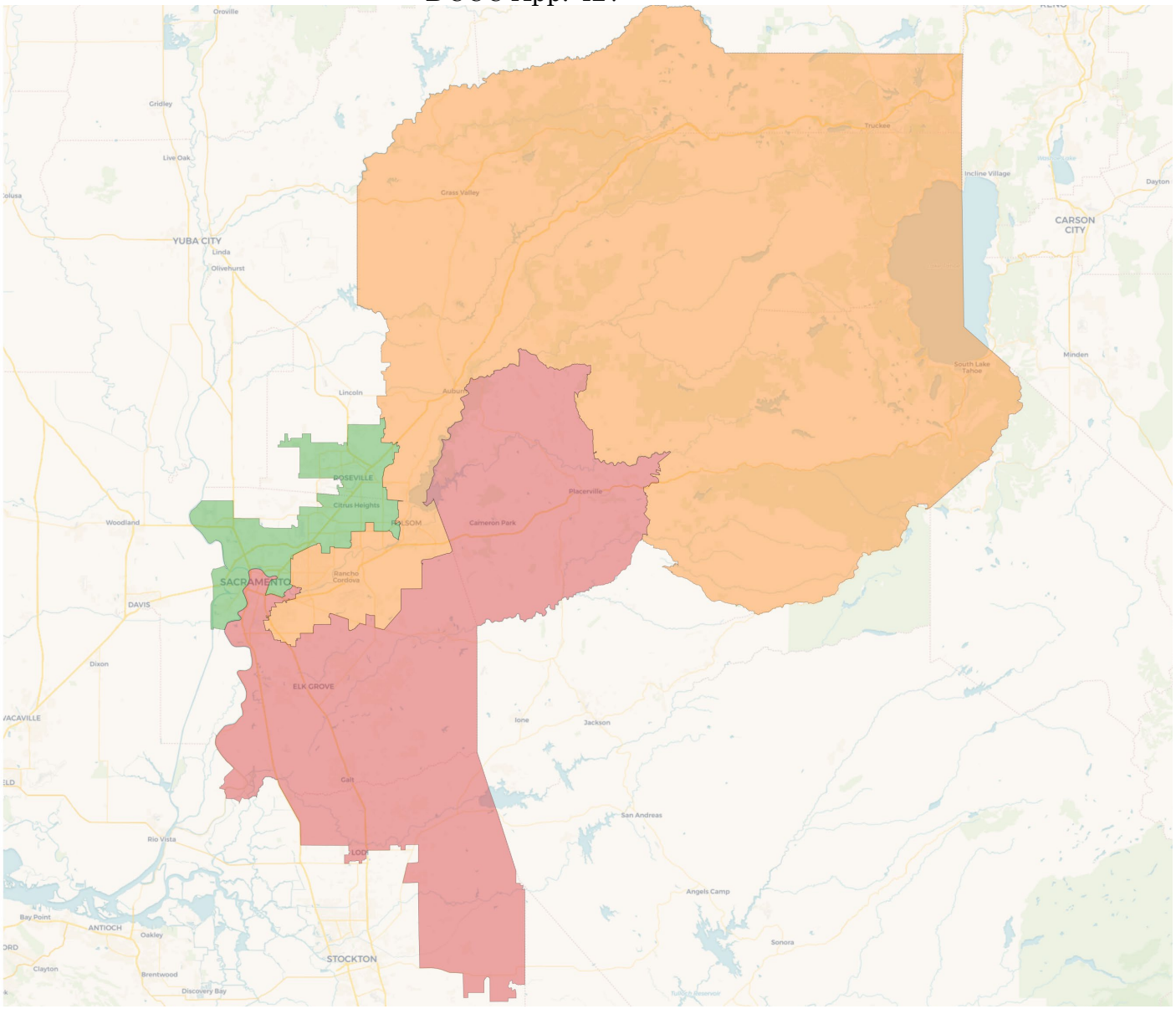


Exhibit 523 - 20

REDISTRICTING PARTNERS

CA Congressional
2021 CRC Lines - Central Valley

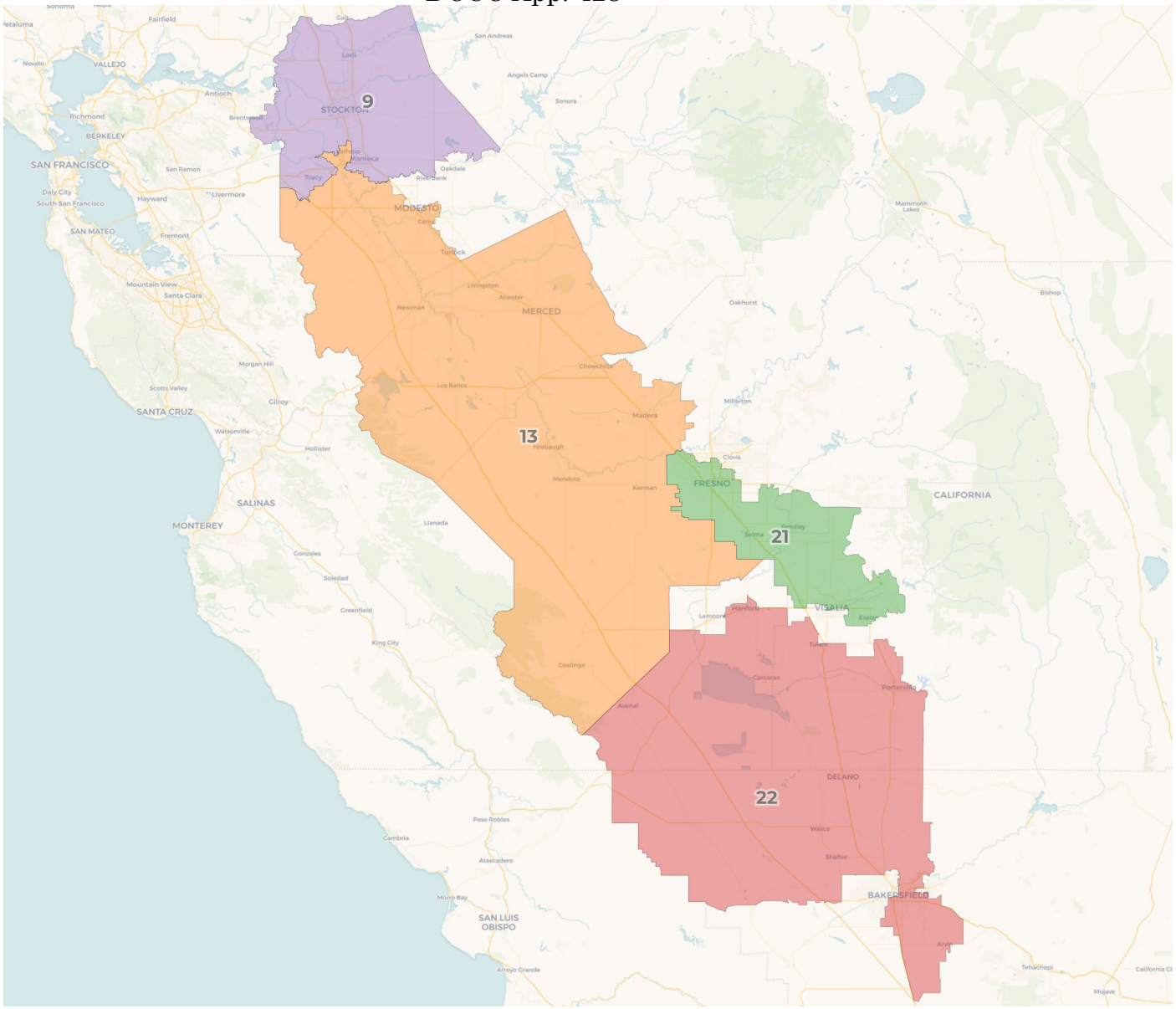


Exhibit 523 - 21

California Congressional
Public Submission - Central Valley

REDISTRICTING PARTNERS

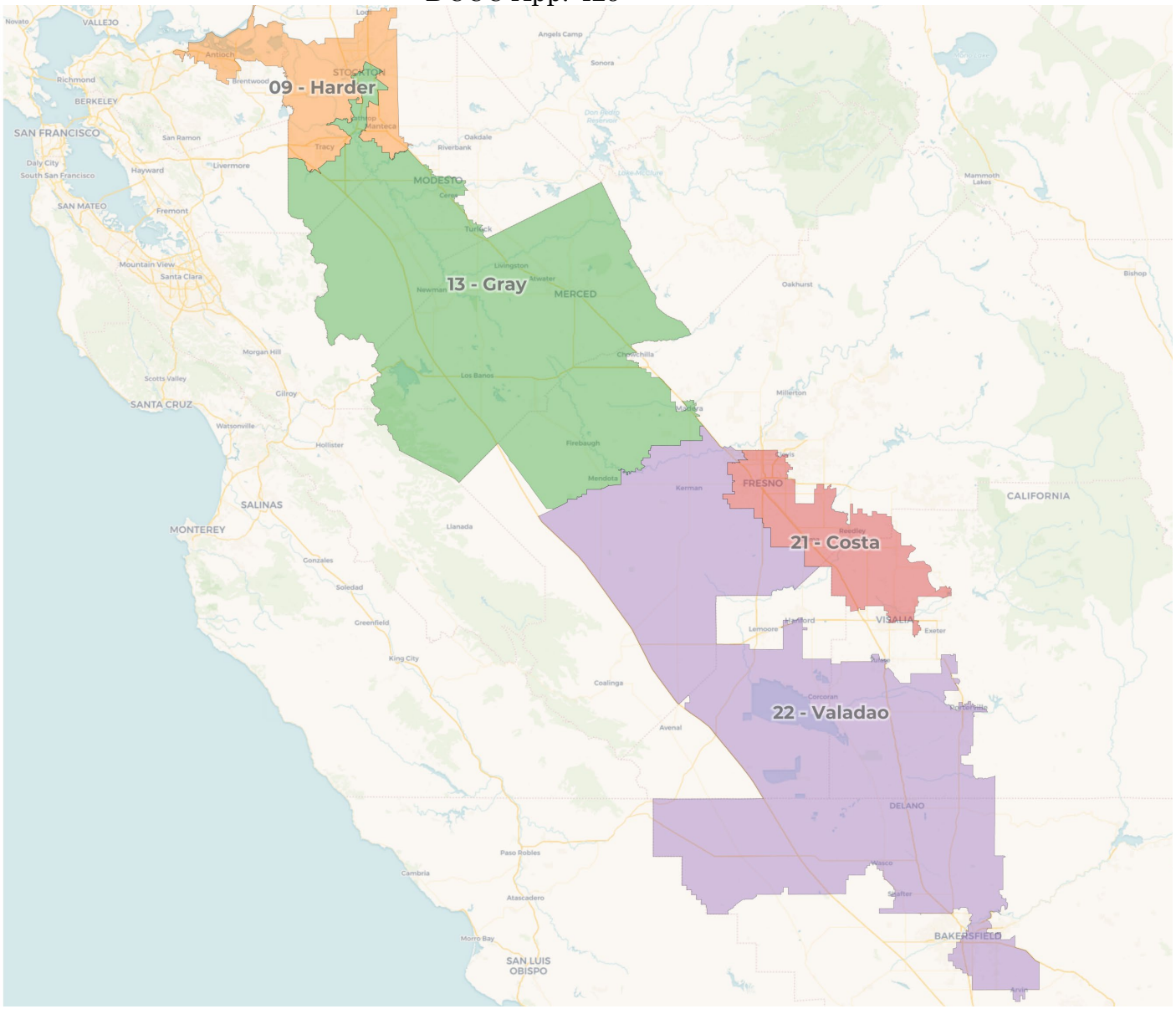


Exhibit 523 - 22

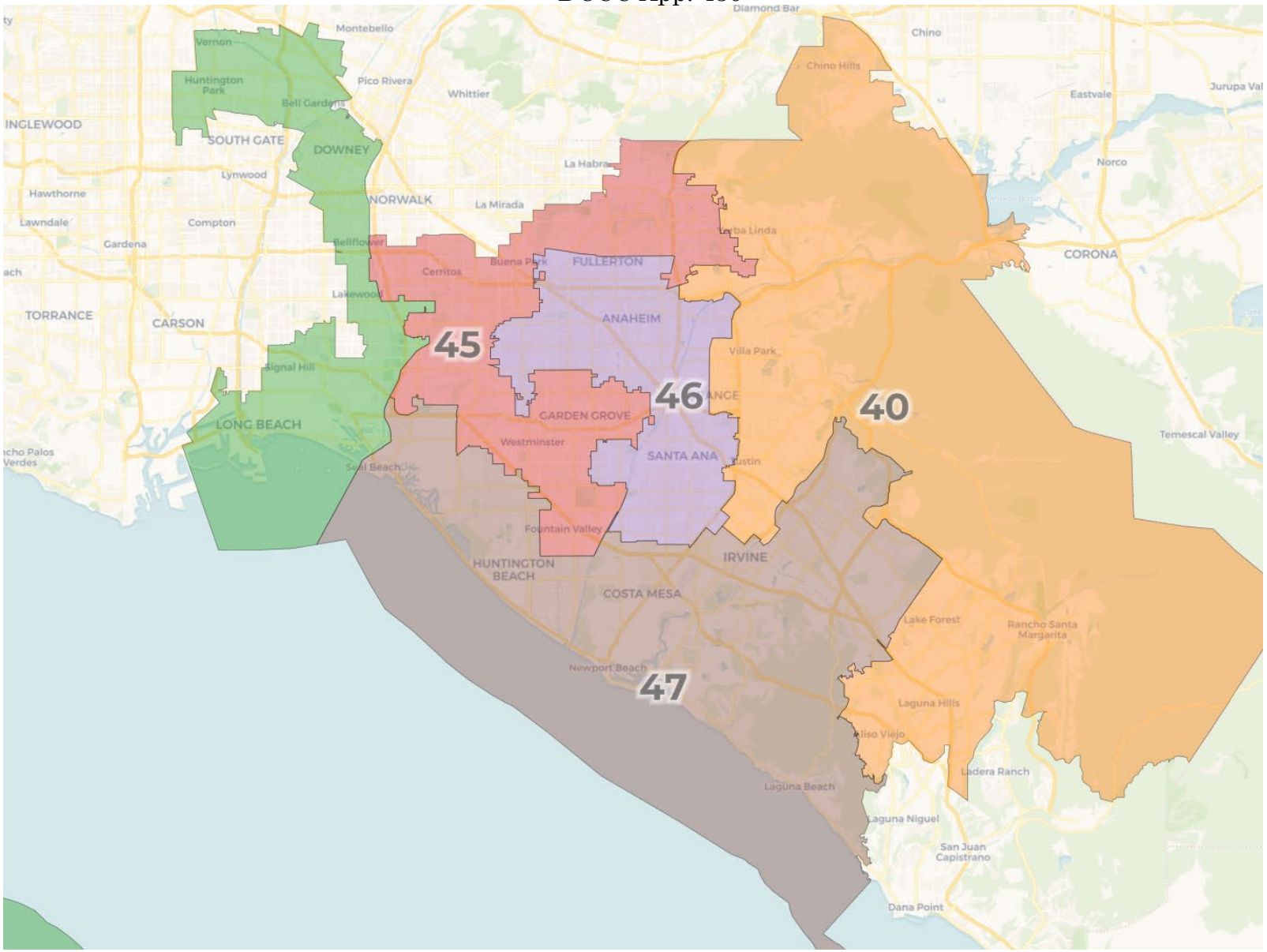


Exhibit 523 - 23

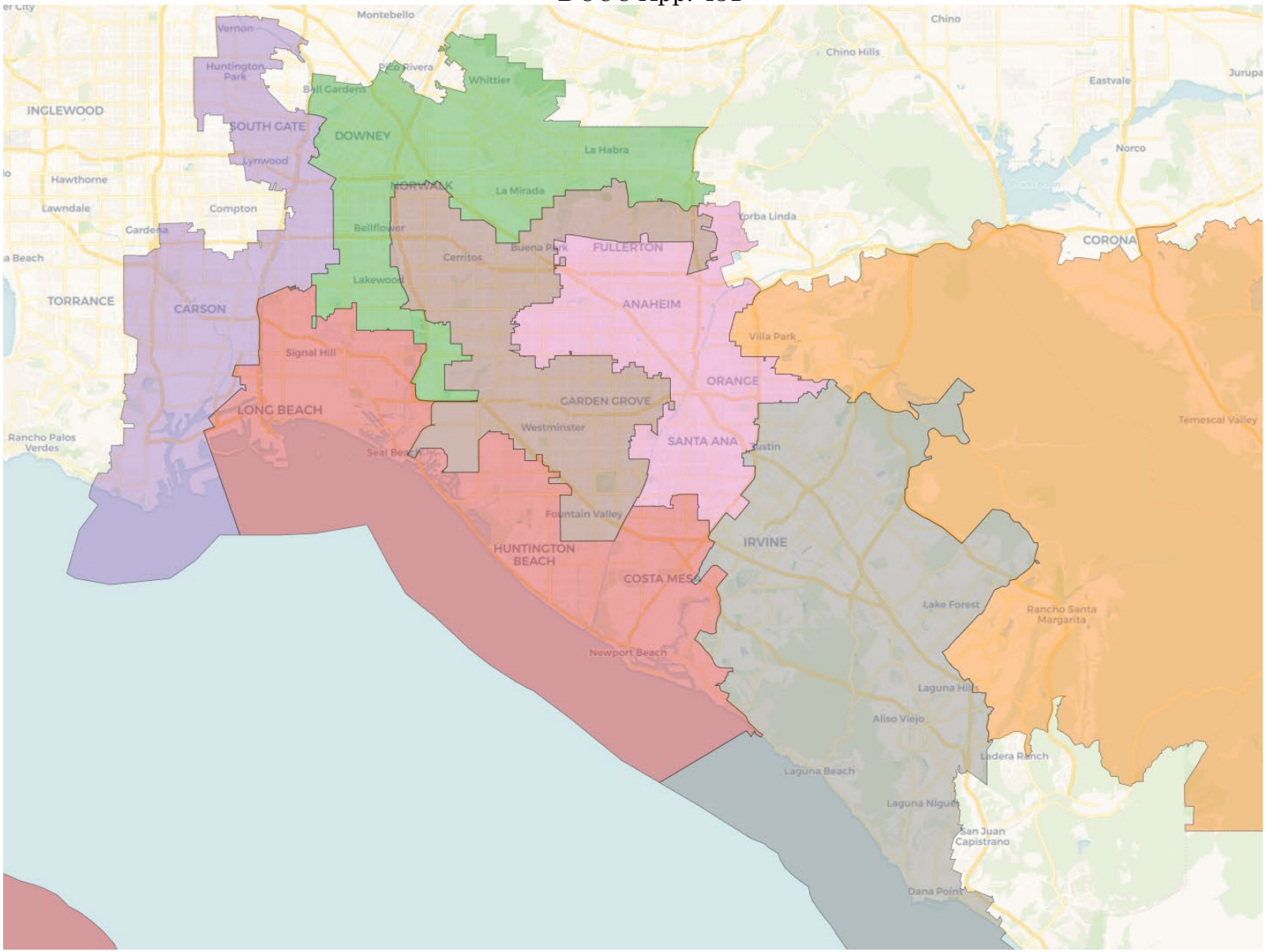


Exhibit 523 - 24

REDISTRICTING PARTNERS

CA Congressional

2021 CRC Lines - San Diego/Riverside

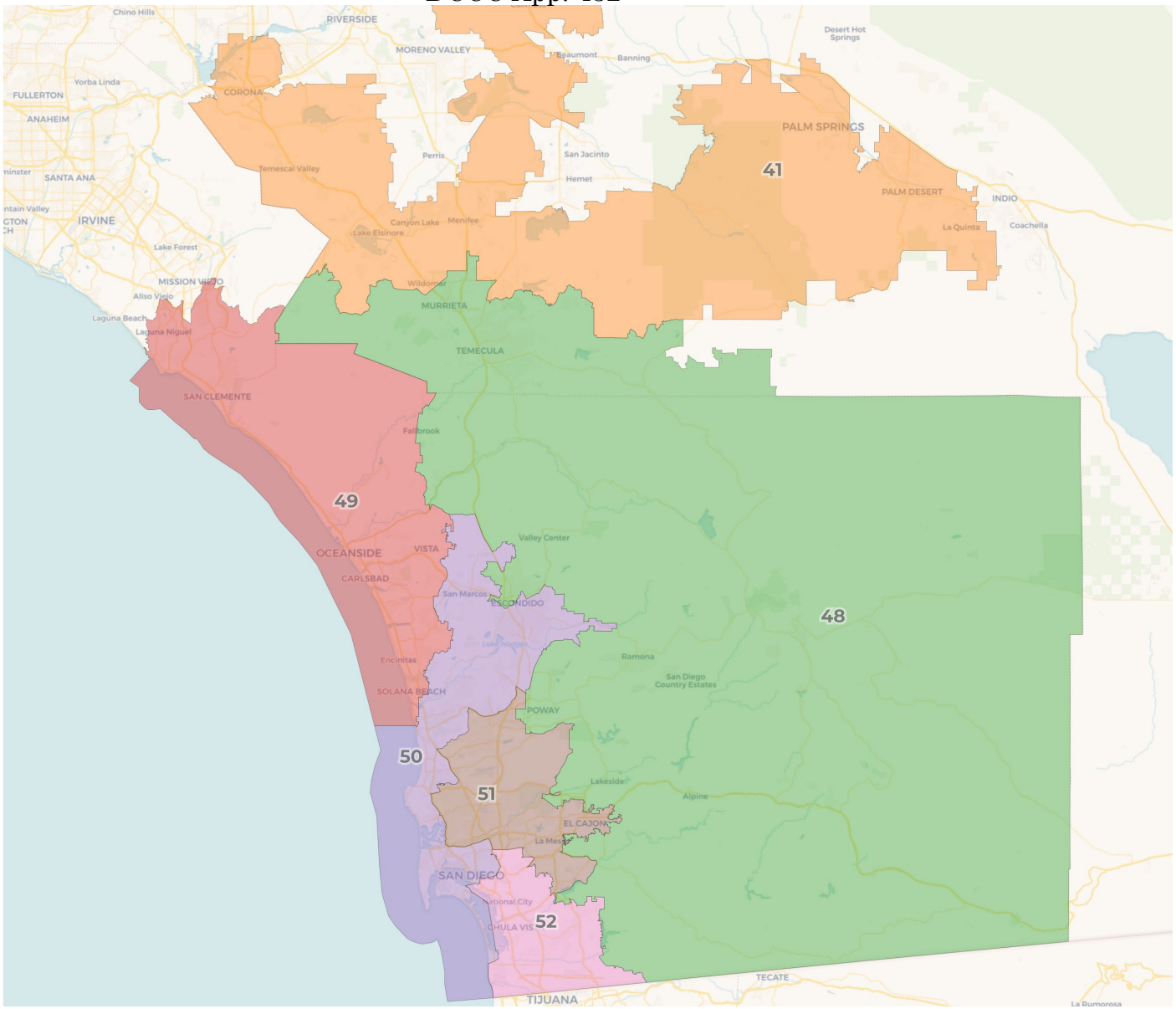


Exhibit 523 - 25

REDISTRICTING PARTNERS

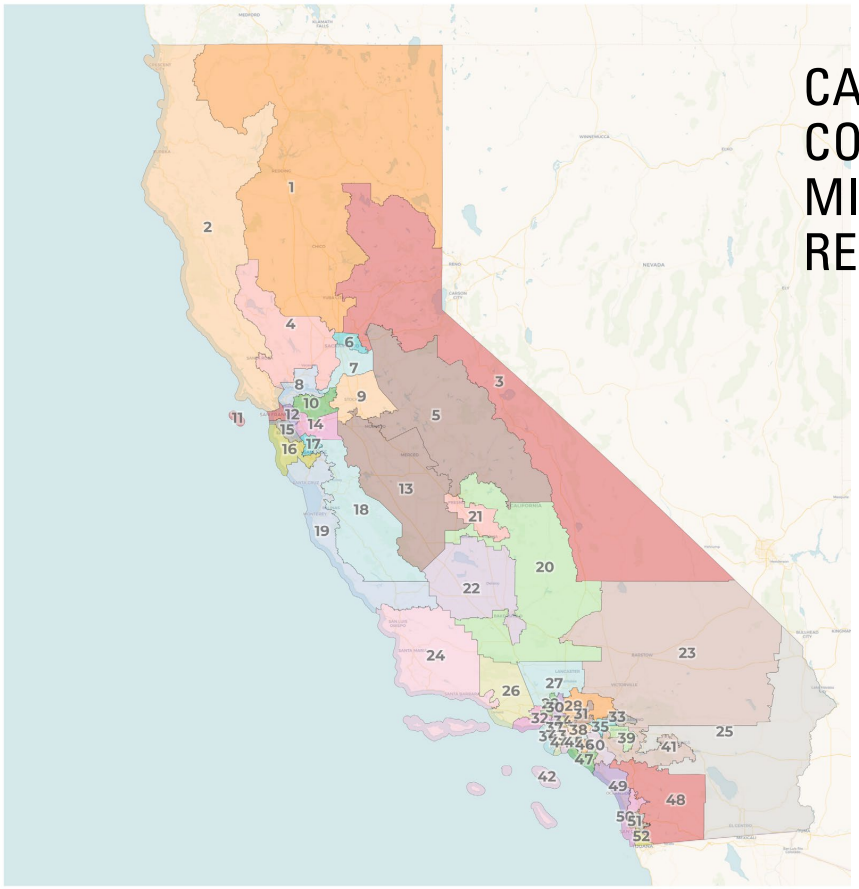
CA Congressional

Draft Plan H4 - SD Riverside

Exhibit 523 - 26

California Congressional
Adopted 2021 - 2025 Data

REDISTRICTING PARTNERS

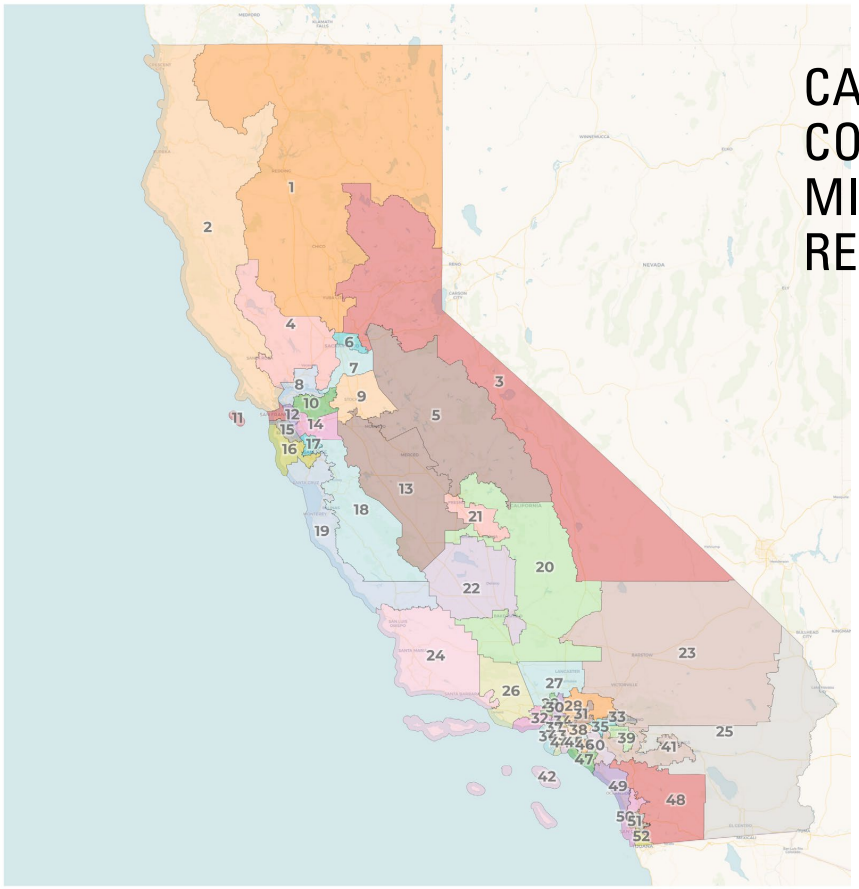


CALIFORNIA CONGRESSIONAL MID-DECADE REDISTRICTING

Ex. 525

California Congressional
Adopted 2021 - 2025 Data

REDISTRICTING PARTNERS

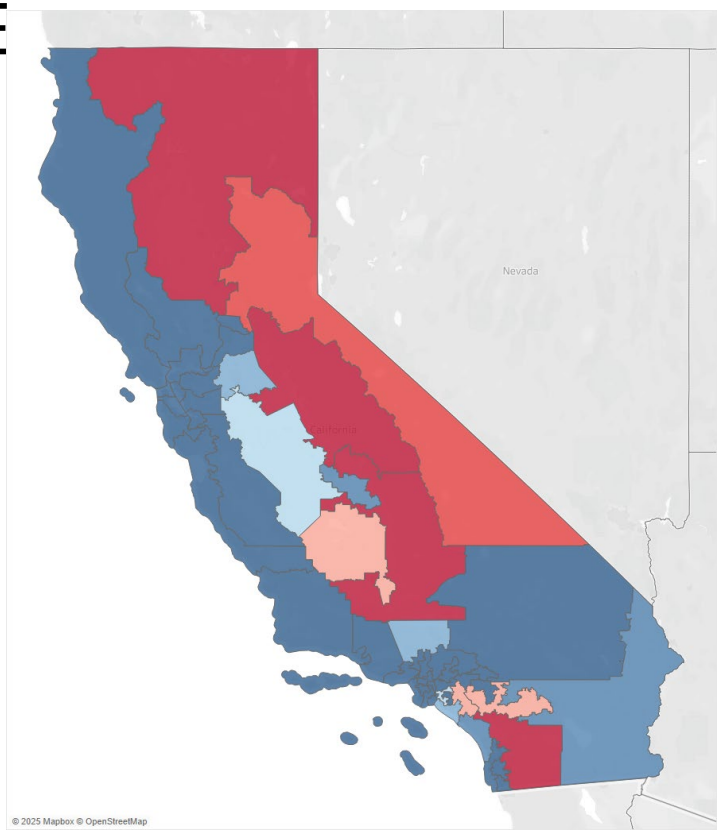


CALIFORNIA CONGRESSIONAL MID-DECADE REDISTRICTING

REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

- The old map had several swing, likely and lean Democratic contests, with seven seats that Democrats won in 2018 and have fought to hold and/or win back in subsequent elections.

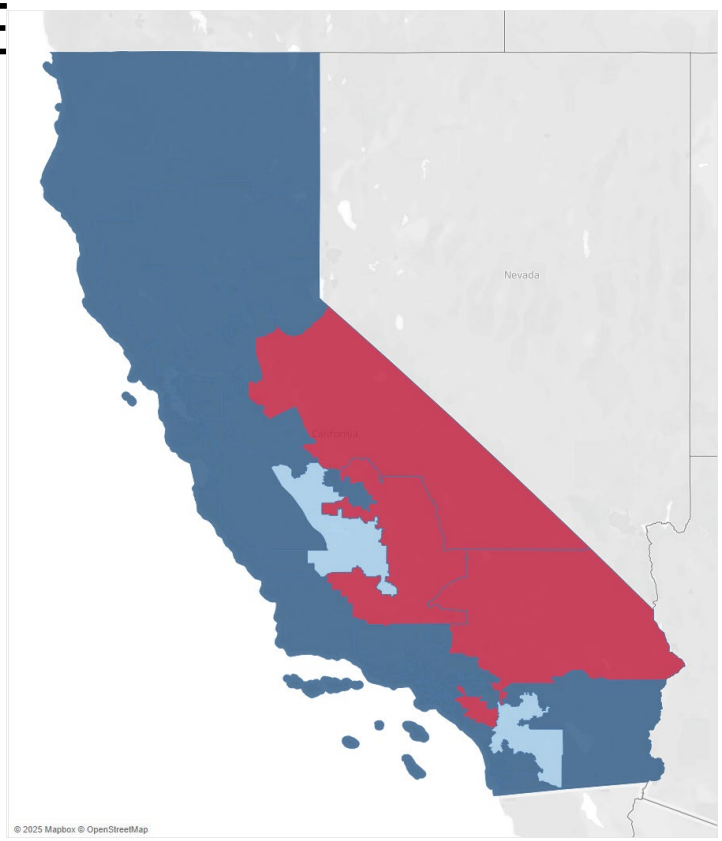


REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

- The old map had several swing, likely and lean Democratic contests, with seven seats that Democrats won in 2018 and have fought to hold and/or win back in subsequent elections.

- The new map puts California on track to win 48 Democratic seats in 2026



REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

Democratic Performance in these seats can be seen along a scale from Safe Republican to Safe Democratic – with the middle consisting of Lean or Toss-up Seats

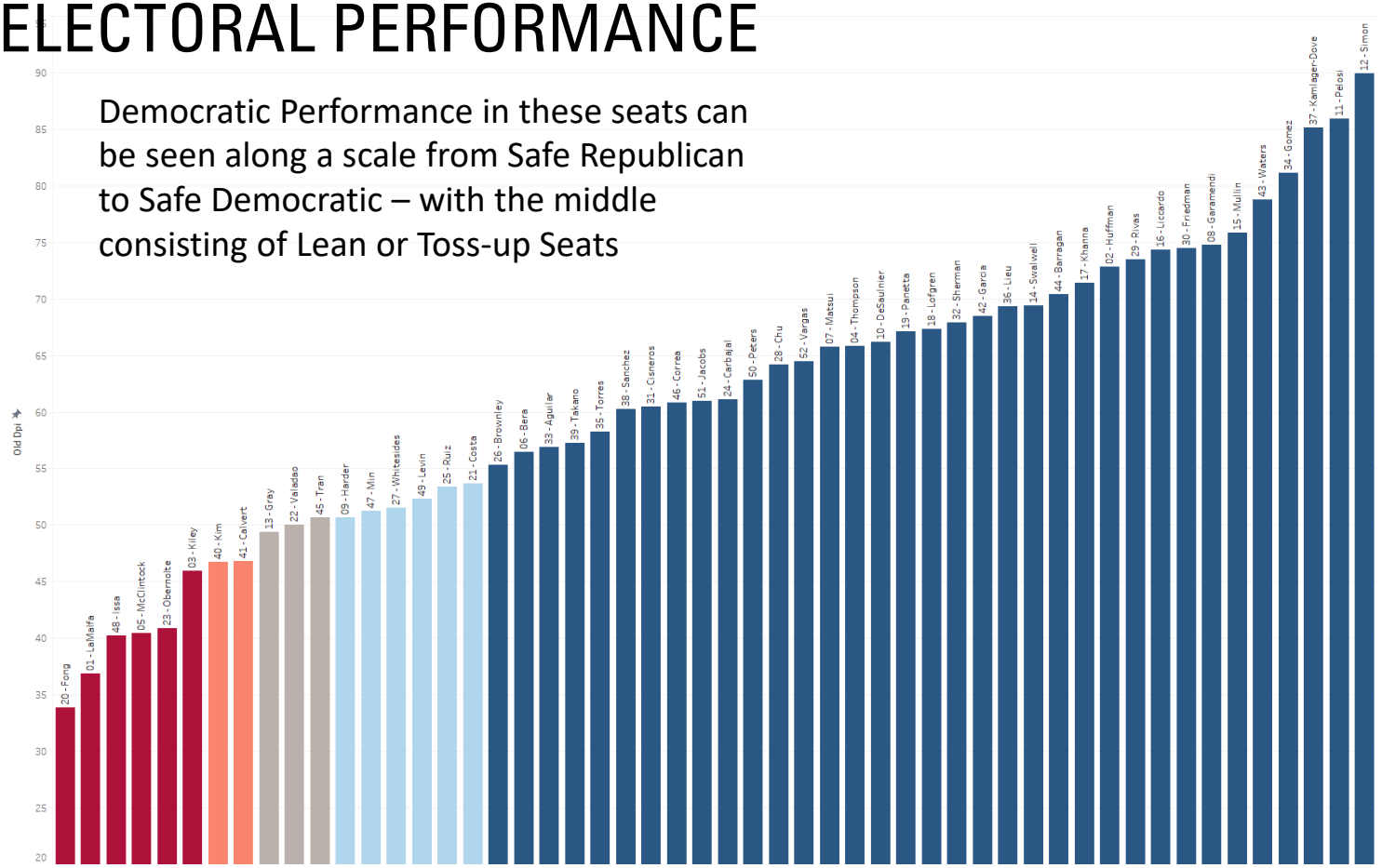
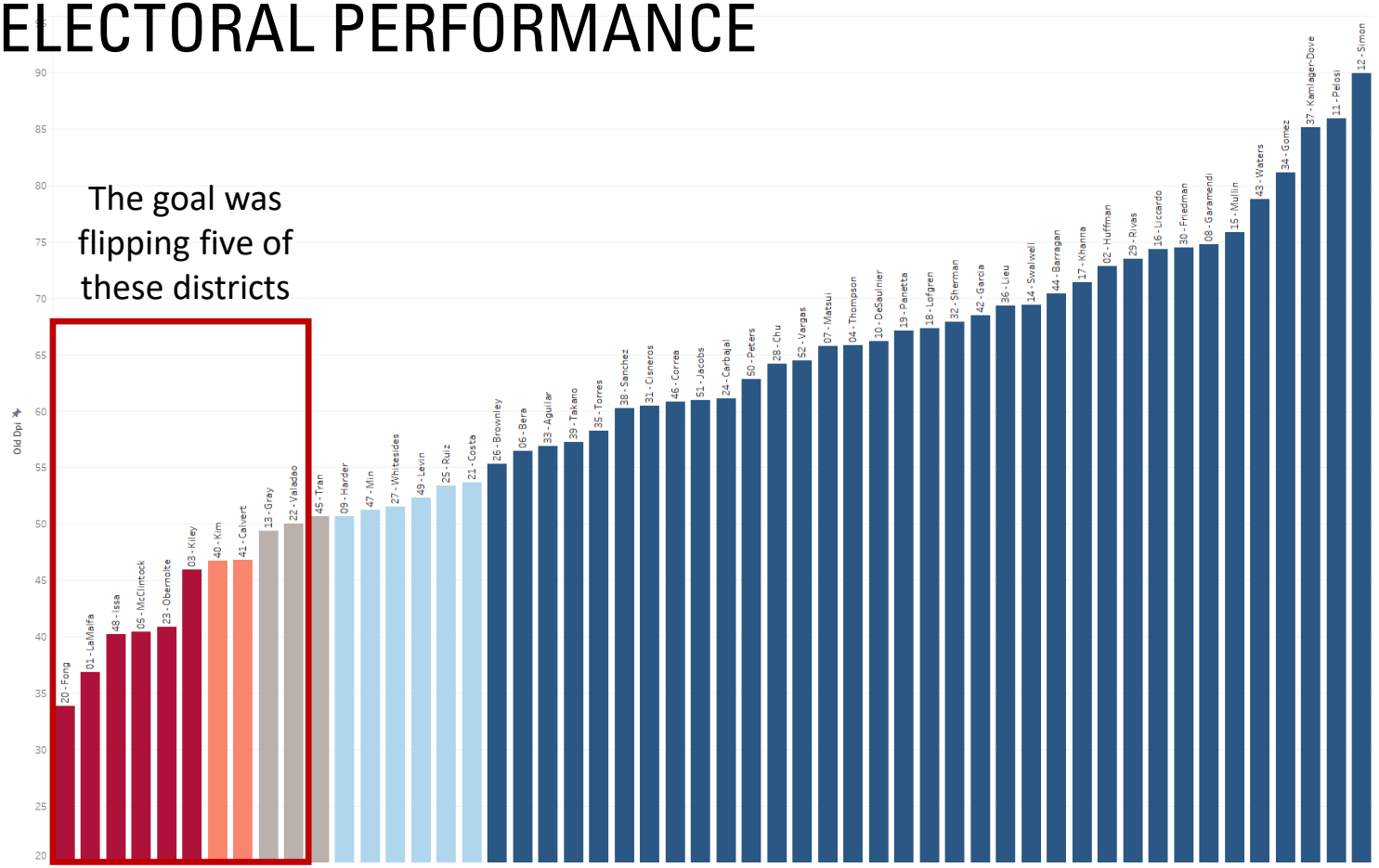


Exhibit 525 - 4

REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE



REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

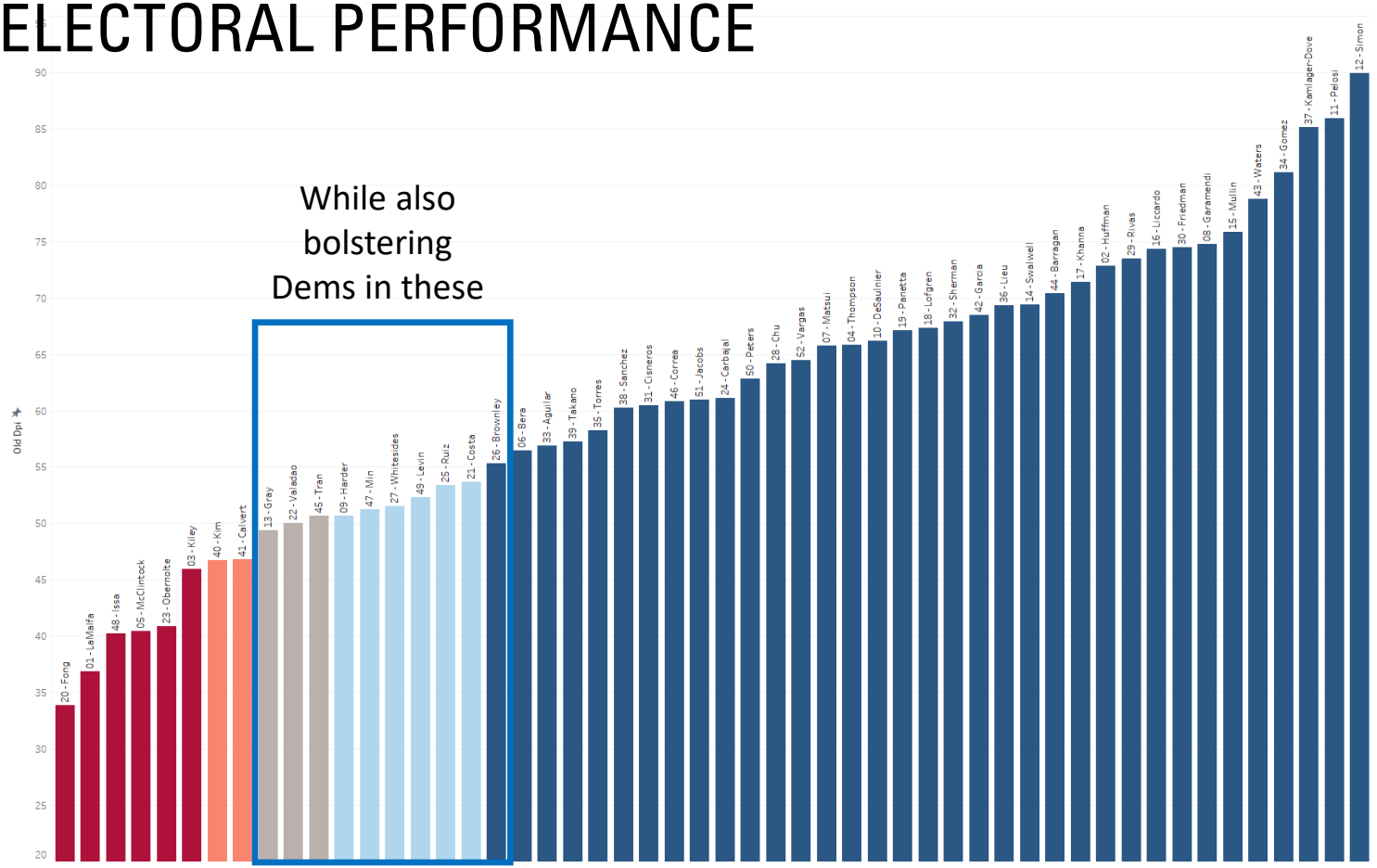
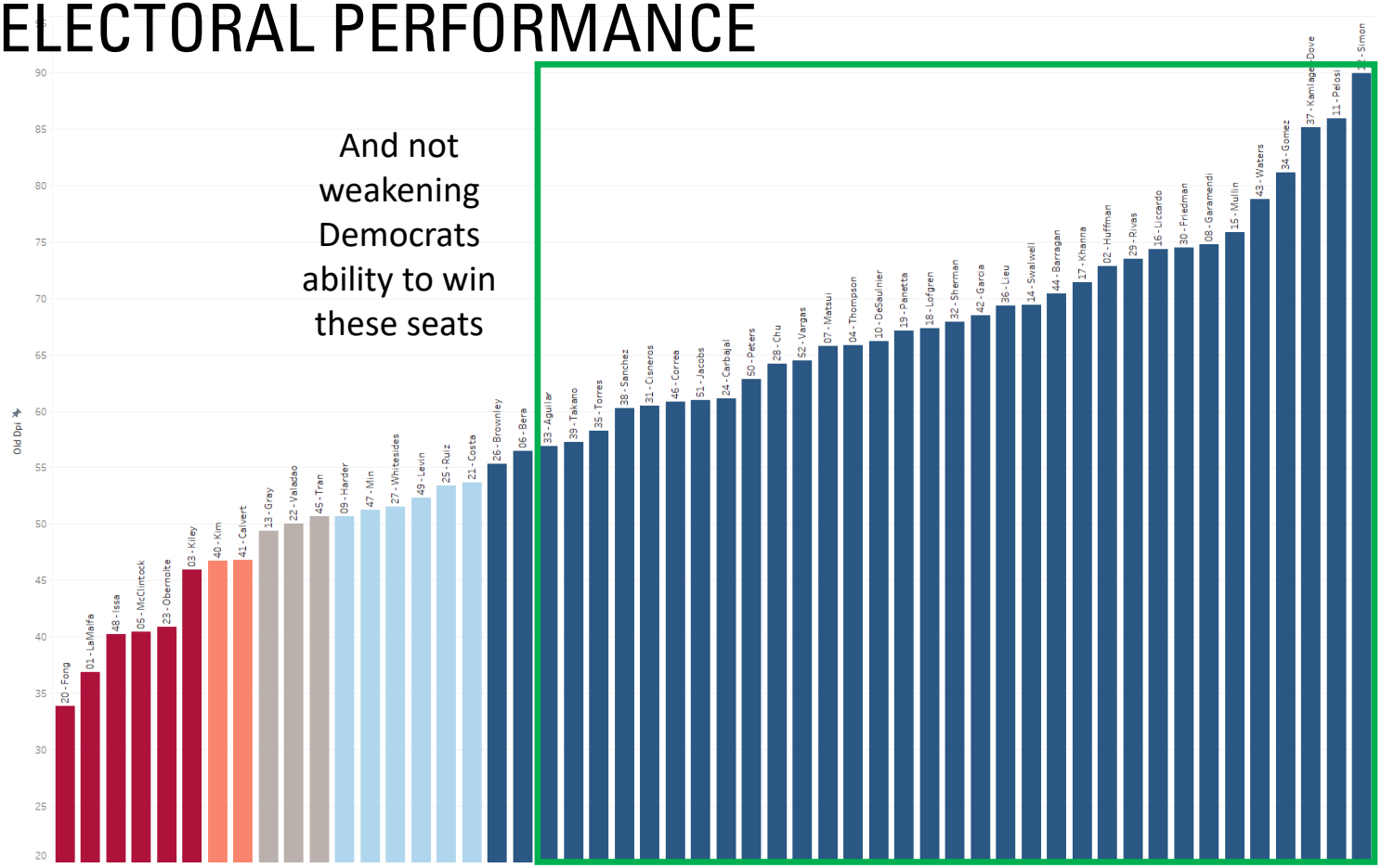


Exhibit 525 - 6

REDISTRICTING PARTNERS

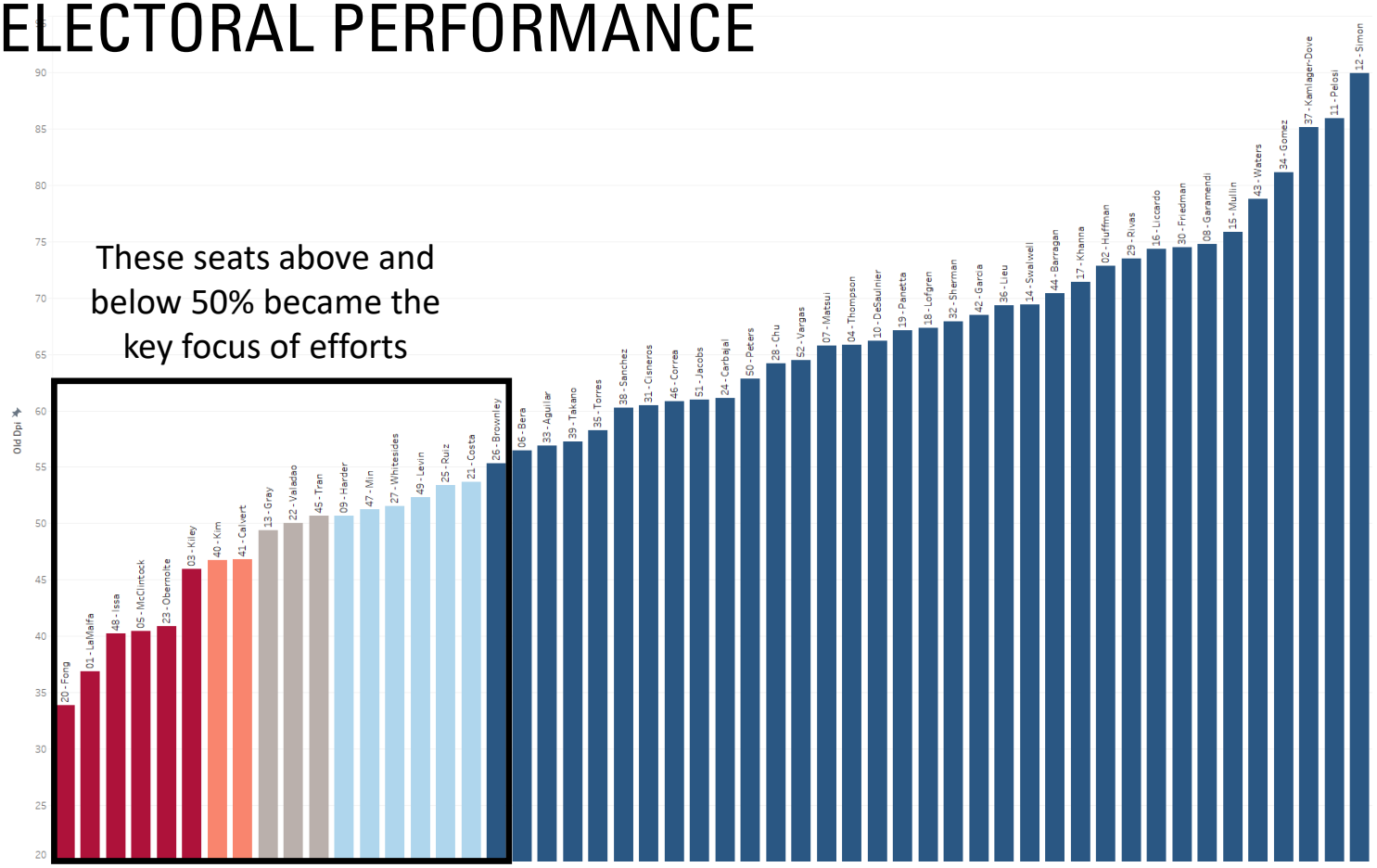
ELECTORAL PERFORMANCE



And not weakening Democrats ability to win these seats

REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE



REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

Focus on Rep and Swing seats

Above and below 50% Dem Performance

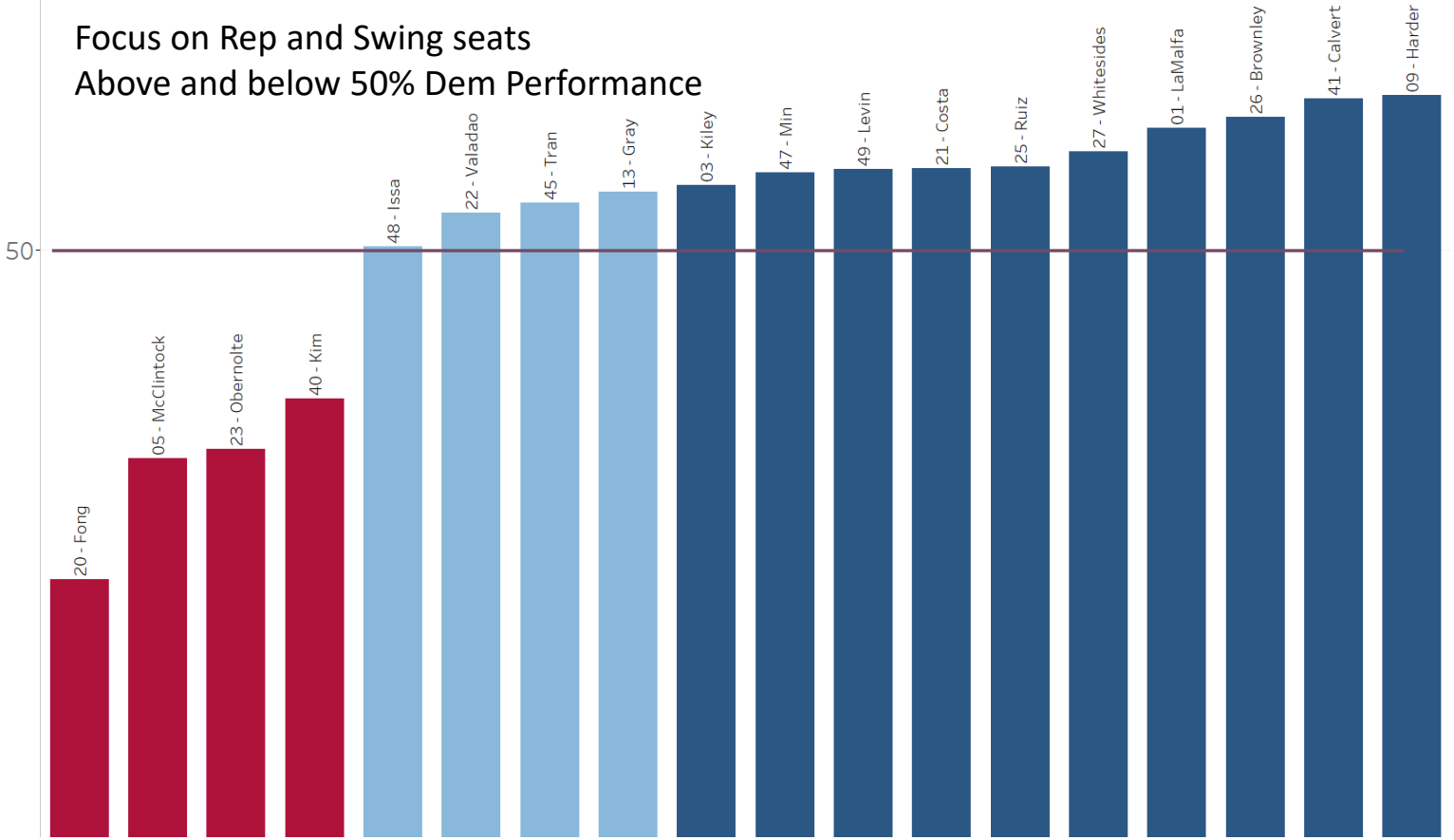


Exhibit 525 - 9

California Congressional
2021 Adopted Plan

REDISTRICTING PARTNERS

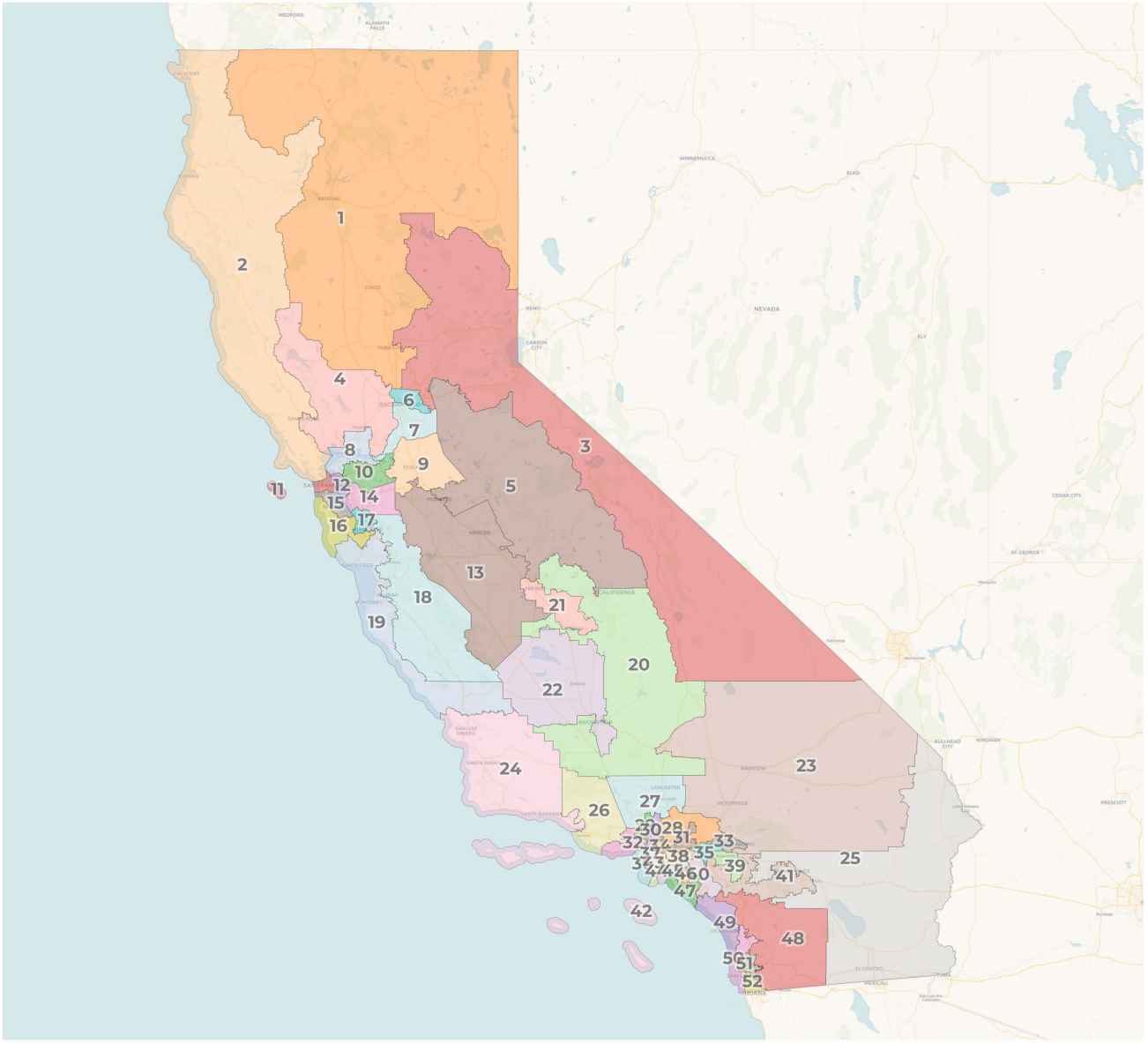


Exhibit 525 - 10

California Congressional
Public Submission

REDISTRICTING PARTNERS

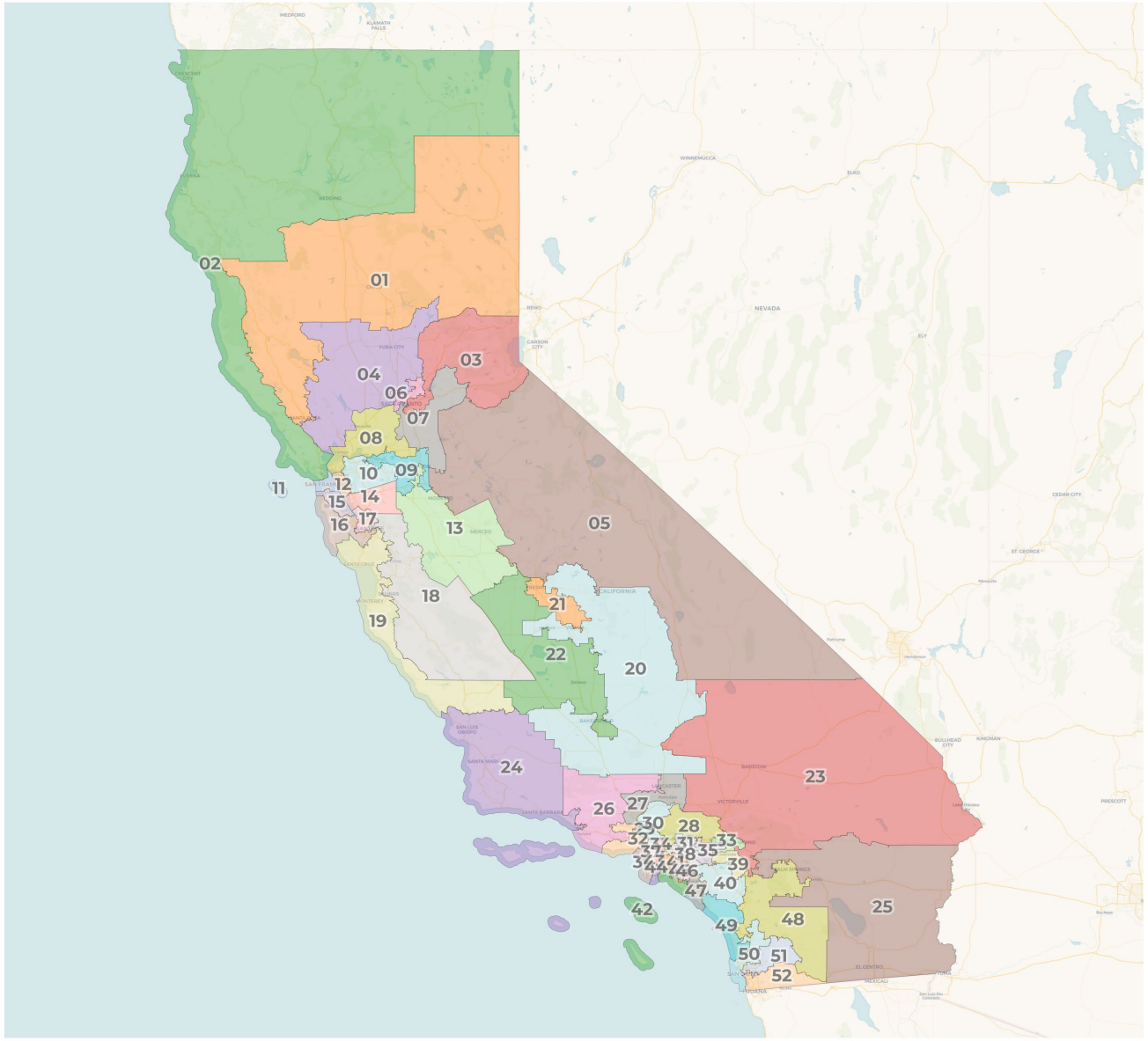


Exhibit 525 - 11

REDISTRICTING PARTNERS

CA Congressional

2021 CRC Lines - Northern California

Exhibit 525 - 12

REDISTRICTING PARTNERS

CA Congressional
Draft Plan H4 - NorCal

Exhibit 525 - 13

CA Congressional
2021 CRC Lines - Sa

REDISTRICTING PARTNERS

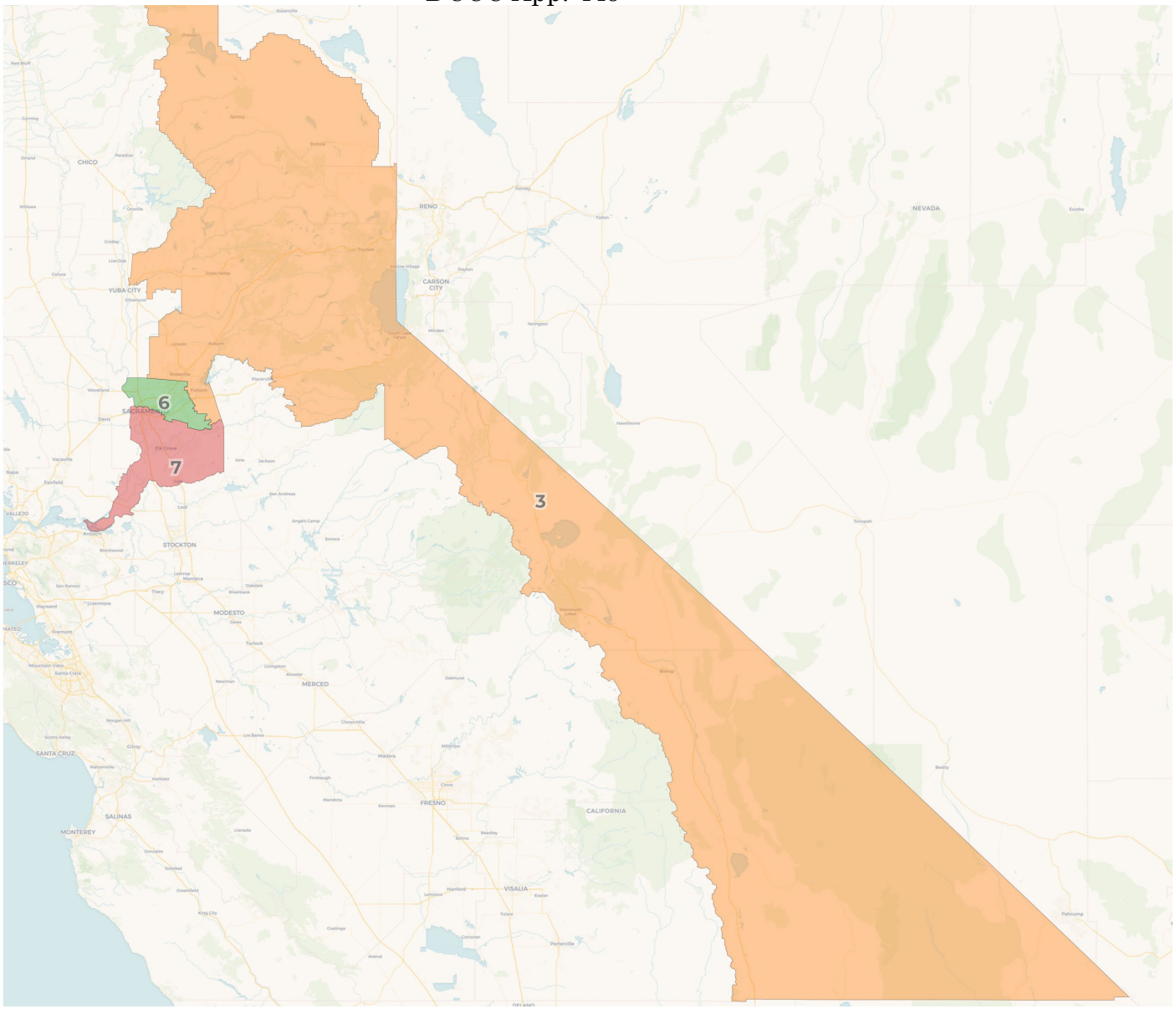


Exhibit 525 - 14

CA Congressional
Draft Plan H4 - Sac Metro

REDISTRICTING PARTNERS

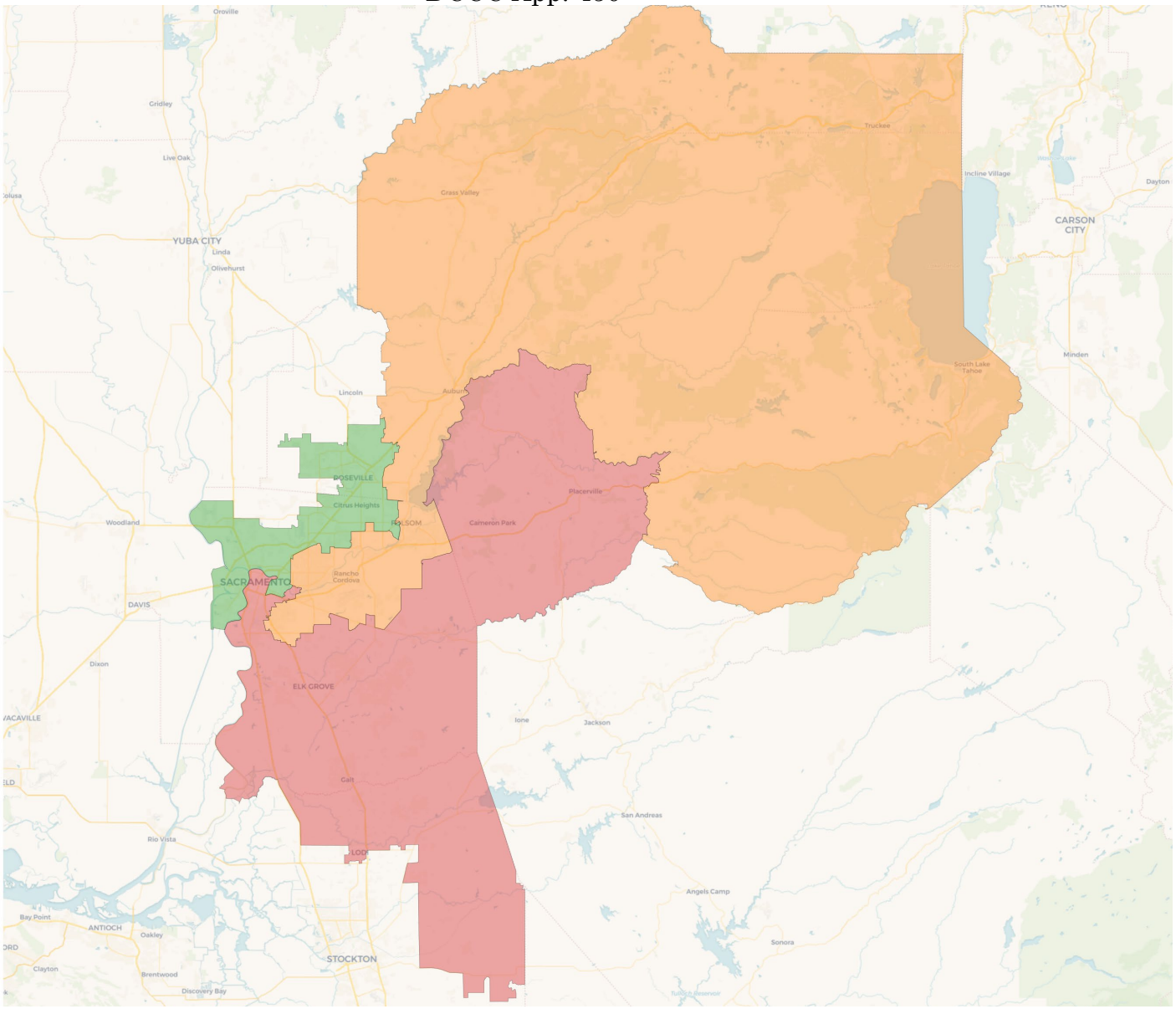


Exhibit 525 - 15

REDISTRICTING PARTNERS

CA Congressional
2021 CRC Lines - Central Valley

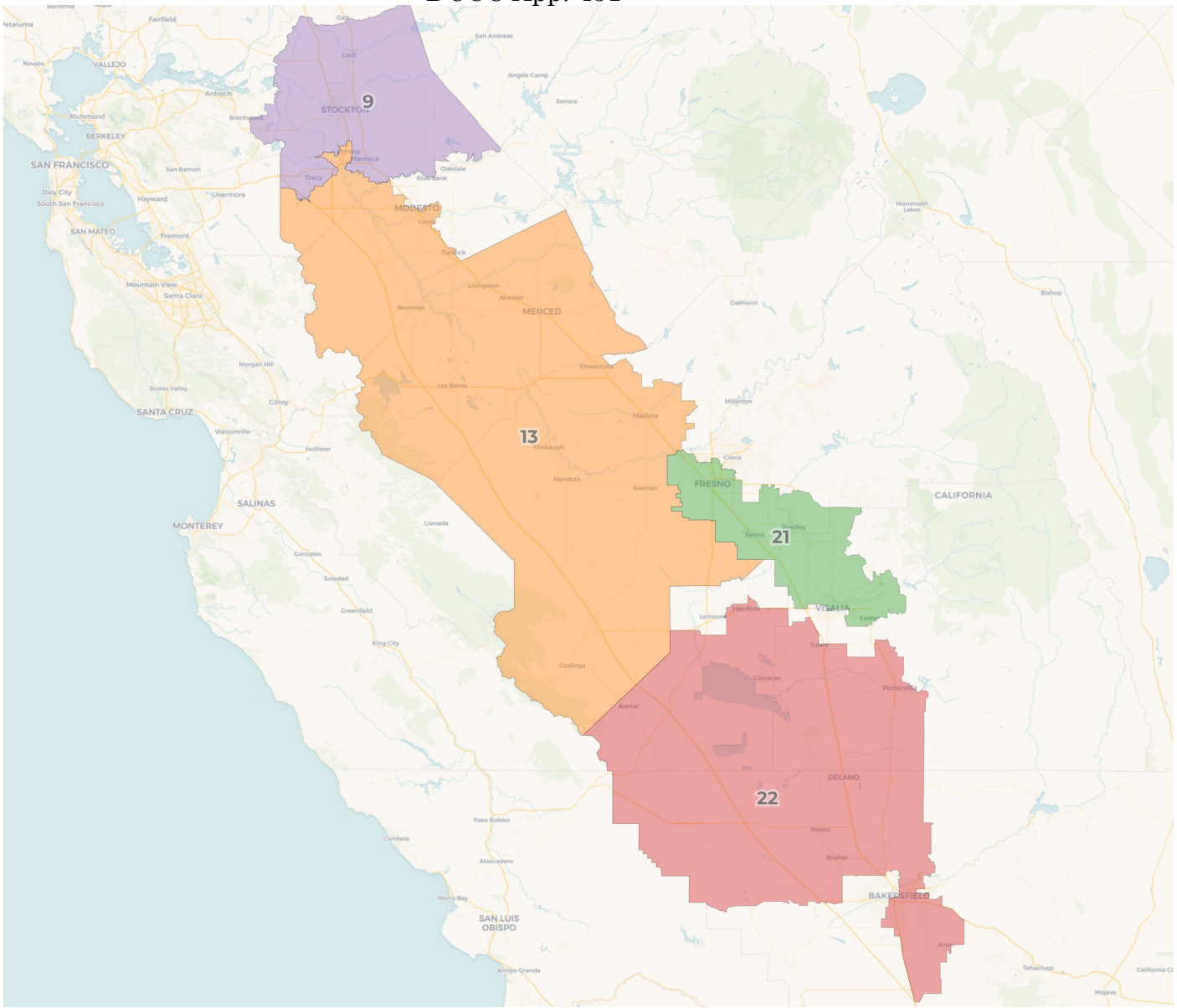


Exhibit 525 - 16

California Congressional
Public Submission - Central Valley

REDISTRICTING PARTNERS

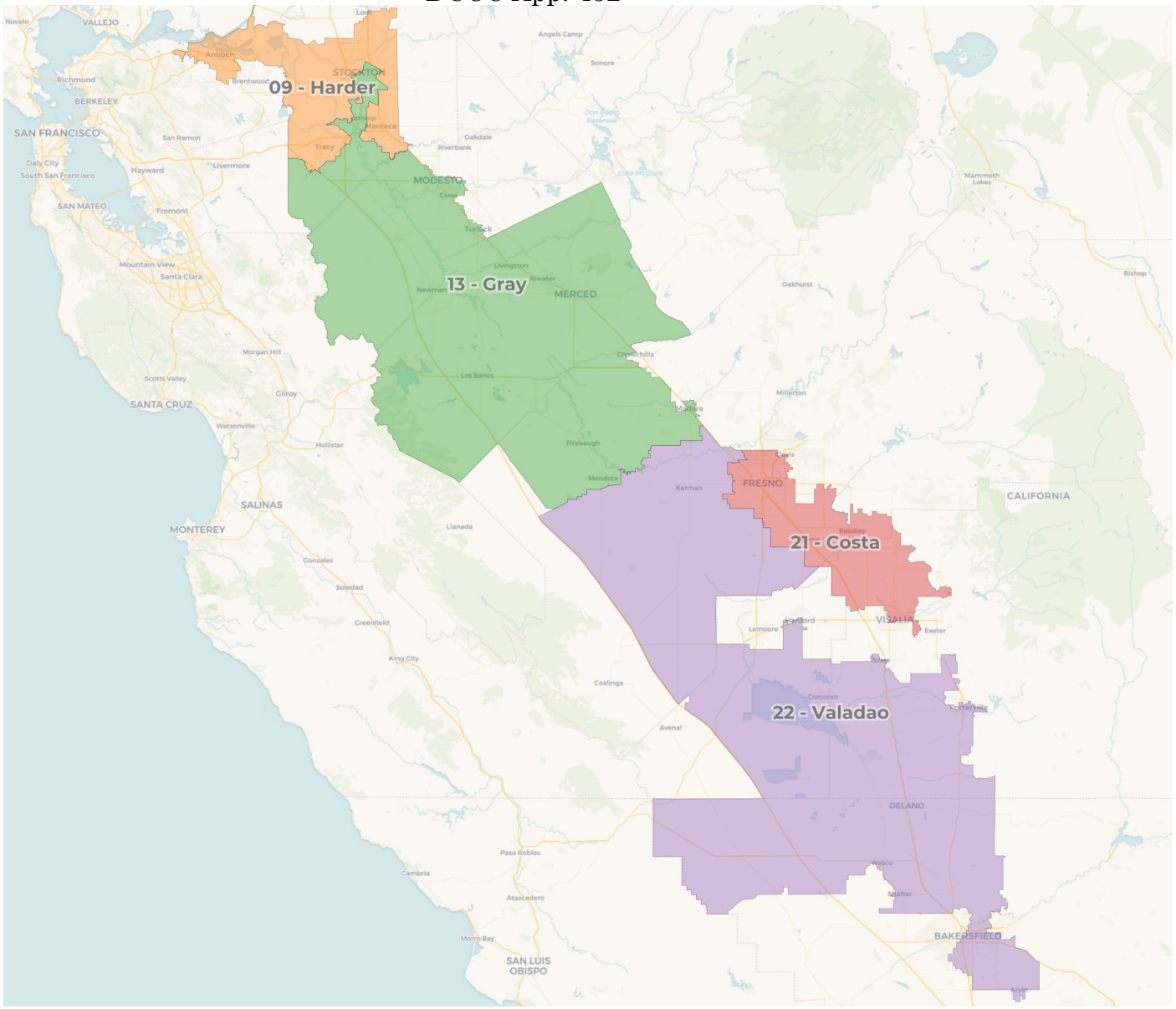


Exhibit 525 - 17

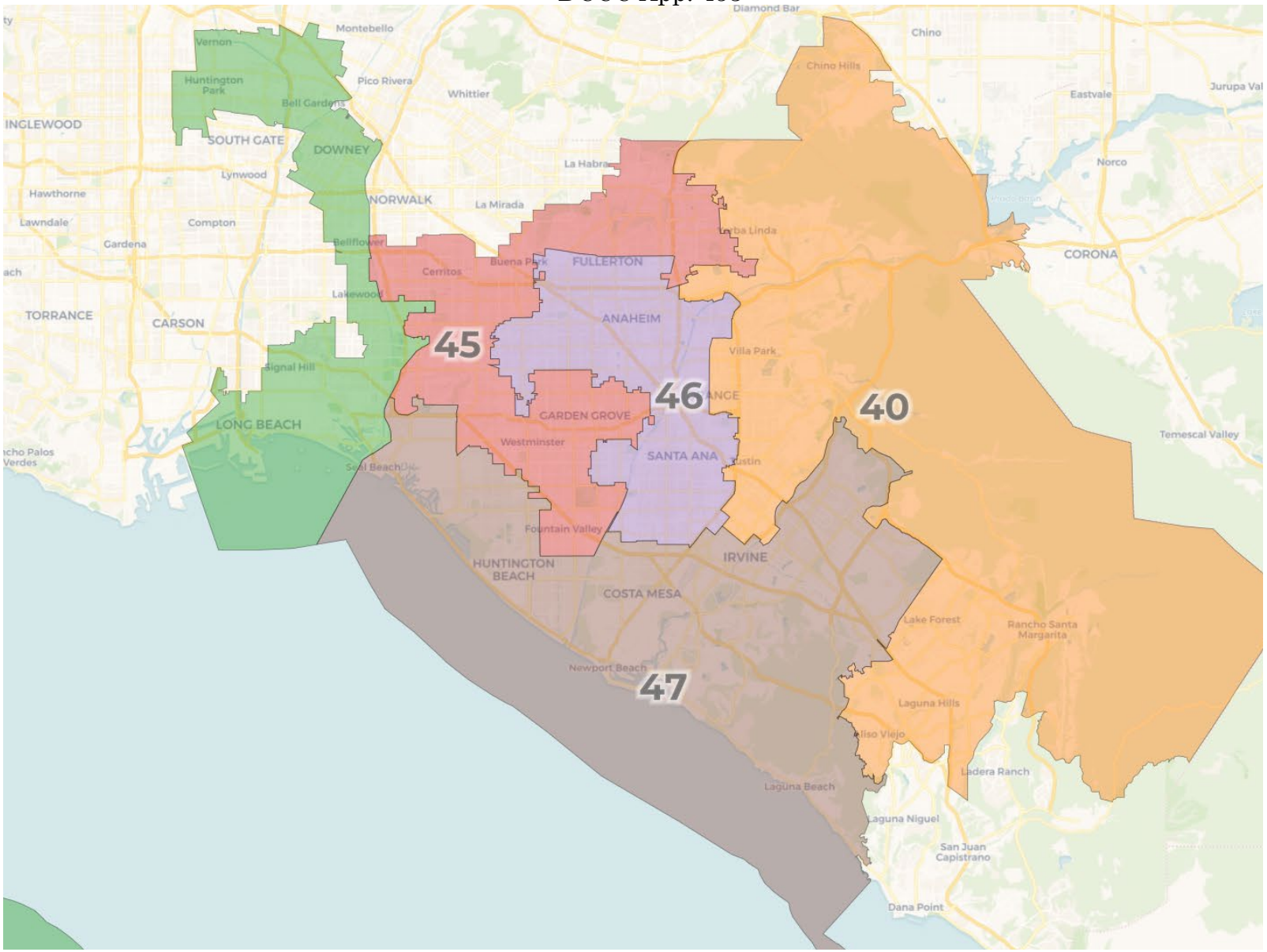


Exhibit 525 - 18

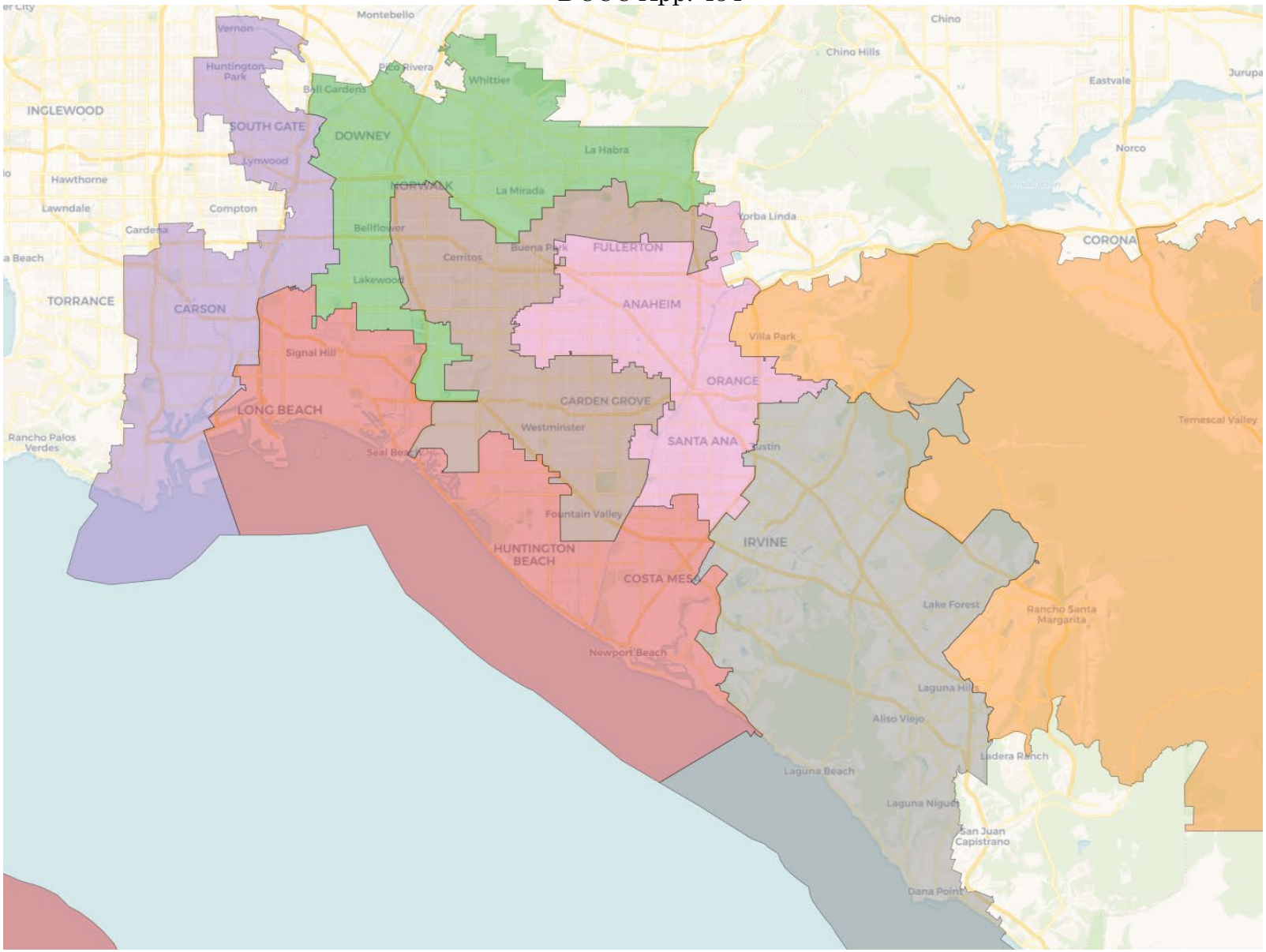


Exhibit 525 - 19

REDISTRICTING PARTNERS

CA Congressional

2021 CRC Lines - San Diego/Riverside

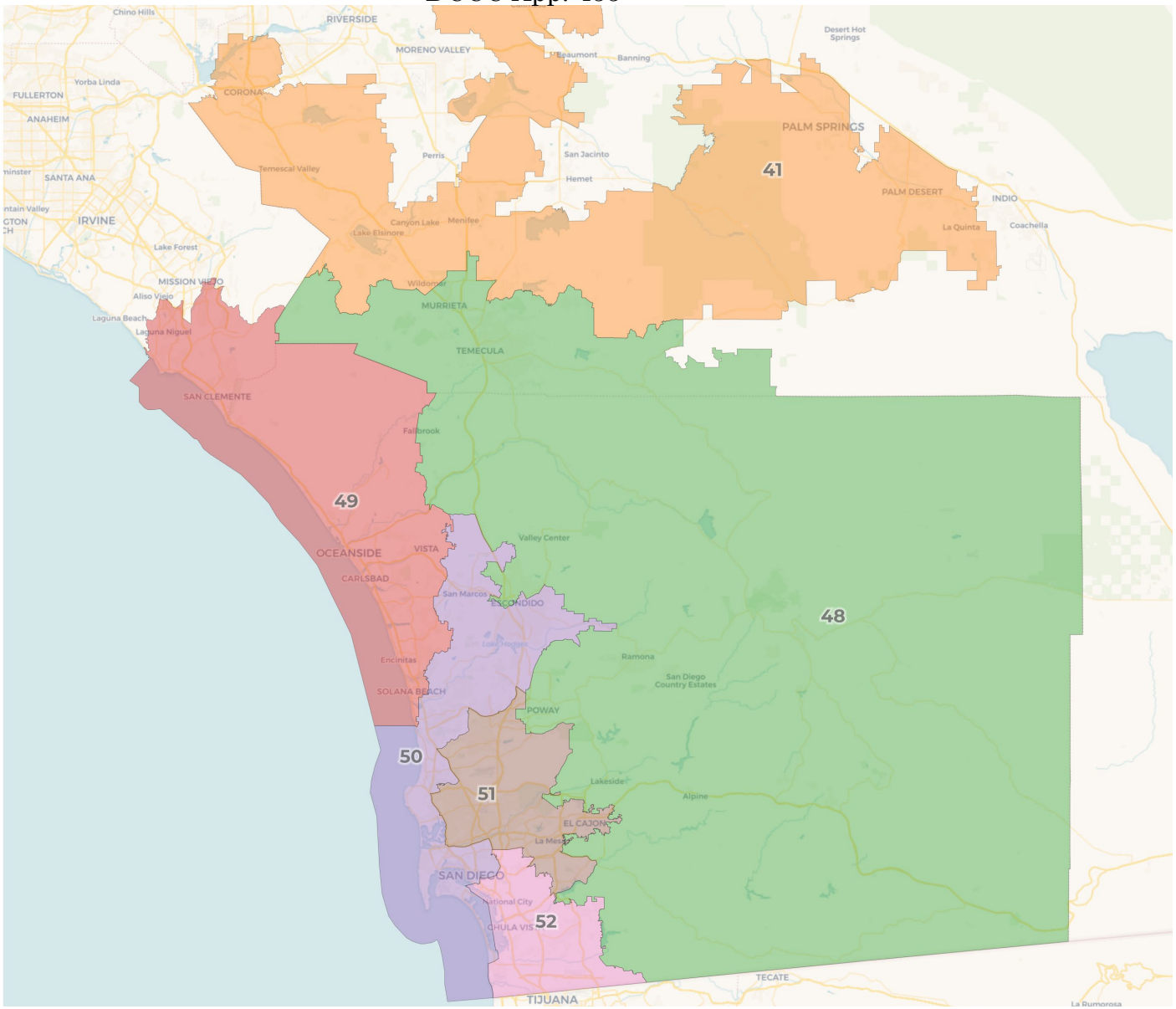


Exhibit 525 - 20

REDISTRICTING PARTNERS

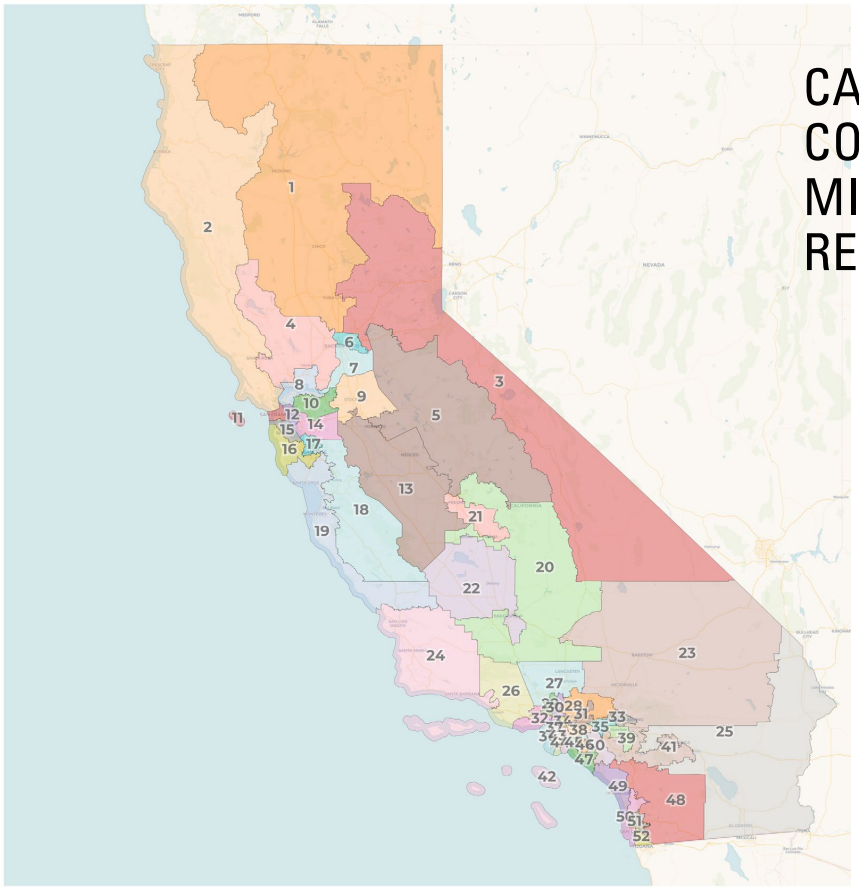
CA Congressional

Draft Plan H4 - SD Riverside

Exhibit 525 - 21

California Congressional
Adopted 2021 - 2025 Data

REDISTRICTING PARTNERS



CALIFORNIA CONGRESSIONAL MID-DECADE REDISTRICTING

Ex. 526

REDISTRICTING PARTNERS

EXECUTIVE SUMMARY

In June of this year, President Donald Trump called Texas Governor Greg Abbott and told him he wanted five more Republican districts. This started a mid-decade redistricting arms race that has the potential to give Republicans enough new seats to decide control of Congress after the 2026 election.

A month later, Governor Gavin Newsom told Jon Favreau and Tommy Vietor of Pod Save America that while he supported independent redistricting, he also knew he needed to fight back – to fight fire with fire. This started a movement in California that has led to today's submission of a potential redistricting map to the State of California Assembly Speaker and Senate Pro Tempore, for their consideration.

The attached public submission meets Texas seat-for-seat. If they are going to perform a mid-decade redistricting to put five Democratically held seats into the Republican column, we can target five Republican seats in return.

At the same time, we have the ability to do something that Texas does not – we can create partisan improvements for current Democratic officeholders, protecting these seats for 2026 and future elections.

Texas has already done a partisan gerrymander in 2021 when their plan received an "F" grade for fairness from the nonpartisan Gerrymandering Project. So, they have already pushed for partisan gain, and they are now attempting to squeeze out more Republican seats. At some point, this strategy will fail as they weaken their current Republican office holders in order to flip Democratic seats.

The last time California did a partisan redistricting was in 1991. As a result, using a partisanship criteria, we have many more opportunities to bolster the Democratic share of the vote in current Democratically held seats in addition to flipping Republican-held seats. As this plan will show, California can match or improve over Texas and can do it following the highest standards in redistricting criteria.

While this map is a response to Texas and other states that are doing some of the most egregious gerrymandering in the country, this map is reflective of how California does redistricting – with values – protecting the Voting Rights Act, preserving county, city and neighborhood boundaries, protecting communities of interest, and creating shapes that are compact.

This plan splits fewer cities than Texas' plan, and even fewer cities than the Citizen's Redistricting Commission (CRC) plan it replaces. It also is more compact than either the Texas plan or the 2021 CRC Plan.

While the compactness criteria used in California is

Who Drew the Lines

Our firm, California-based Redistricting Partners, has been active in redistricting in California, and nationwide. The Redistricting Partners staff that put together this submission, have done over 100 non-partisan redistrictings in California, including 14 Counties, 38 Cities, and dozens of other school, community college and other special district boards. We have also served as staff to the New York State and New York City independent redistricting commissions and have consulted on redistricting in 14 other states. We advised the New Mexico Ethics Commission and foundations on that state's inaugural redistricting commission. In addition to municipal and state redistricting, we have worked for non-profit and community-based organizations, including Common Cause, the American Civil Liberties Union, Advancement Project, Irvine Foundation, and other foundations exploring redistricting, voting rights and elections issues.

The final map has benefited from over 20 years of experience working worked on redistricting and election data in counties ranging from Humboldt County in the North to Imperial County in the south, within the state's most urban core to most rural regions, in some of the highest and lowest income communities, and within diverse Black, Asian and Latino populations,

The Criteria Used

From the beginning of this process, all involved in were committed to the values of Californians expressed through their legislature when they passed the state's FAIRMAPS Act for municipalities, voters when they implemented the Citizens Redistricting Commission (CRC) in 2008, and an even stronger vote for extending these responsibilities to congress in 2010.

The required criteria includes the following:

- Equal Population
- Federal Voting Rights Act.

- Contiguity
- Preserving Communities of Interest
- Geographic Integrity, reducing city and county splits
- Compactness

For **equal population** we stayed with the traditional one-person deviation common in congressional redistricting. This was based on the whole person count of the 2020 US Census as adjusted by the state for prison population.

The Voting Rights Act was utilized in a manner consistent with Citizen's Redistricting Commission, with experts involved from the beginning of the process.

Contiguity was central to the creation of these districts, and we considered both the actual contiguity – areas that were touching, and functional contiguity, as, for example, where the Commission sought to draw Catalina Island with CA42 because it includes the points of departure for ferries that take residents and visitors to the island.

In state law a **Community of Interest** is defined as "a contiguous population which shares common social and economic interests that should be included within a single district for purposes of its effective and fair representation."

We focus on communities of interest in all our local municipal redistricting, and we have conducted this work in nearly every county of the state, and in every region. And, as such, we bring to our short process a long history of working at the local level and hearing the concerns of residents as they approach the redistricting process.

In the CRC's final report they state:

> *"Public input is critical to respecting the geographic integrity of communities of interest, so the Commission launched the innovative public engagement tool, described above, that allowed Californians to tell the Commission about their communities, draw them on a map, and submit their comments directly to the Commission."*

This means that the commissioners had access to information that was provided by an online portal to help guide their line drawing. This online portal is still available and was a valuable resource in our line drawing.

Throughout this process, we utilized actual commission testimony, public submissions, and resources from the CRC website at https://wedrawthelines.ca.gov/data-dashboard. In addition, we had members of the team who had spent hundreds of hours watching commission meetings over the past two redistricting cycles – giving them an expertise in

the communities throughout the state who have been involved in the process. The document that follows this summary outlines the communities of interest within each district that we changed and quotes actual 2021 public testimony that supports the changes we made.

The commission's **Geographic Integrity** criteria is important, and it is an easily understood metric. The law states that:

> *"The geographic integrity of any city, county, city and county, local neighborhood, or local community of interest shall be respected in a manner that minimizes their division to the extent possible without violating the requirements of any of the preceding subdivisions."*

Our plan has 59 split cities, two fewer than the CRC in 2021. Some of these splits are zero-population but caused by so-called "islands" where a city may have a non-contiguous portion that is sometime miles away from the city core itself. There were some areas where we could fix a city split but didn't because we were not making any changes in that district, and to make one small adjustment could be an undue burden for a local registrar who is otherwise not having any changes in their county.

Within cities, we sought to preserve neighborhoods. So, splits in San Jose, Sacramento, Los Angeles – all cities that were split by the commission, we followed neighborhood boundaries and/or city council district lines to ensure as much geographic integrity and protection of communities of interest in the map.

For **compactness** we considered the criteria utilized by the redistricting commission:

> *"districts shall be drawn to encourage geographical compactness such that nearby areas of population are not bypassed for more distant population."*

This is the lowest ranked commission criteria, and so, appropriately, it was not a priority focus in our efforts. If there was a justification in any of the other criteria for a non-compact shape, we allowed ourselves to consider it, but when all choices were even, we would seek to adopt the most compact option.

While the state requirement is to have compactness based on a qualitative criterion, many who engage in redistricting may evaluate these maps based on quantitative metrics which are predominantly used around the country. And on these metrics the public submission performs well,

[TABLE]

In addition to these criteria, we used **partisanship** to achieve the stated goals of this redistricting. In measuring partisanship we utilized three main datasets, the election results from the recent 2024 Presidential General Election, the 2022 Gubernatorial General, and Party registration in public voter files. These data points allowed us to determine the potential effectiveness of new seats as we considered different options.

Oftentimes, the process was to use the partisanship criteria as a rationale for a single shift of lines, but then in all the subsequent shifts we would utilize the traditional criteria. And we also refused to make some versions of districts that could improve partisan performance if to do so caused a major encroachment of the traditional criteria.

Respect for the 2021 Lines

The CRC is the gold standard for redistricting nationally. Over two successive decades the commission has utilized months of hearings, tens of thousands of public comments, and a fully transparent process to develop plans that were extremely effective in reflecting the population of the state. Maps passed by the commission have been successful in fending off multiple legal challenges and the 2021 plan was passed on a unanimous vote by five Democrats, five Republicans and four non-partisan commissioners.

In trying to combat the mid-decade redistricting in Republican states, including Texas and others, we sought to adjust the lines created by the CRC. This was not a complete redraw of the state. We retained the general structure of the plan passed by the commission in 2021, leaving most districts completely untouched or adjusted less than 10%.

Throughout the process we utilized commission testimony, community of interest submissions and draft maps created by the commission to justify changes. As will be seen in the following district-by-district summary, for all districts we changed, we identified public comments which support the changes.

Measuring Democratic Performance

We utilized multiple measures to determine Democratic performance in these districts. The three main factors we looked at were partisan registration, the most recent presidential election between Donald Trump (R) and Kamala Harris (D), the 2022 gubernatorial contest between Gavin Newsom (D) and Brian Dahle (R) and voter registration files that identified partisanship.

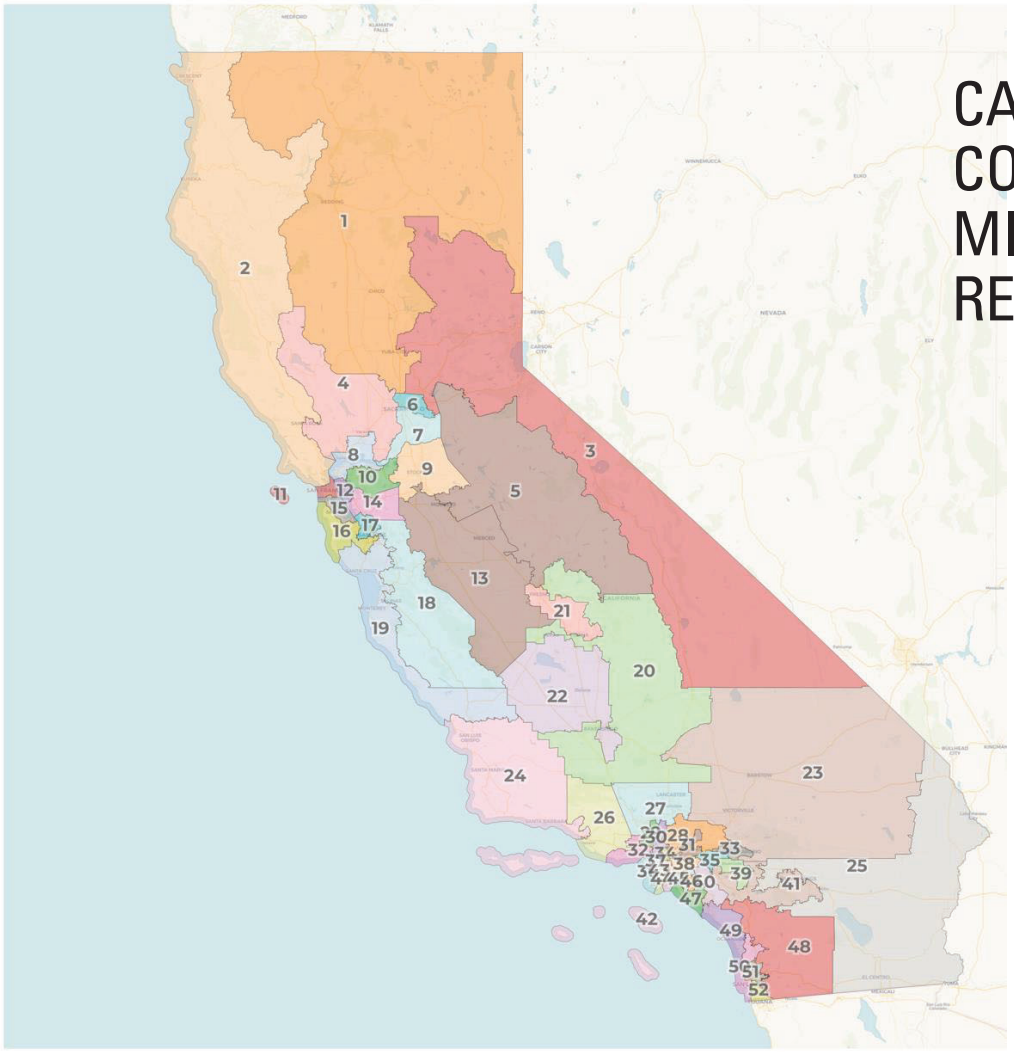
Using these metrics we determined that the commission plan had eight solid Republican seats with current Republican office holders, one Republican-leaning seat with a current Democratic office holder, five lean-Democratic seats with four Democrats and one Republican officeholder, and 39 solid Democratic seats. In the public submission map we find four solid Republican seats, two lean-Democratic seats, and 46 safe Democratic seats. The plan significantly increases opportunities for Democratic candidates going into the 2026 mid-term elections.

	Commission Lines	Public Submission		Commission Lines	Public Submission
1	Safe Republican	Safe Democratic	27	Lean Democratic	Safe Democratic
2	Safe Democratic	Safe Democratic	28	Safe Democratic	Safe Democratic
3	Safe Republican	Safe Democratic	29	Safe Democratic	Safe Democratic
4	Safe Democratic	Safe Democratic	30	Safe Democratic	Safe Democratic
5	Safe Republican	Safe Republican	31	Safe Democratic	Safe Democratic
6	Safe Democratic	Safe Democratic	32	Safe Democratic	Safe Democratic
7	Safe Democratic	Safe Democratic	33	Safe Democratic	Safe Democratic
8	Safe Democratic	Safe Democratic	34	Safe Democratic	Safe Democratic
9	Lean Democratic	Safe Democratic	35	Safe Democratic	Safe Democratic
10	Safe Democratic	Safe Democratic	36	Safe Democratic	Safe Democratic
11	Safe Democratic	Safe Democratic	37	Safe Democratic	Safe Democratic
12	Safe Democratic	Safe Democratic	38	Safe Democratic	Safe Democratic
13	Lean Republican	Safe Democratic	39	Safe Democratic	Safe Democratic
14	Safe Democratic	Safe Democratic	40	Safe Republican	Safe Republican
15	Safe Democratic	Safe Democratic	41	Safe Republican	Safe Democratic
16	Safe Democratic	Safe Democratic	42	Safe Democratic	Safe Democratic
17	Safe Democratic	Safe Democratic	43	Safe Democratic	Safe Democratic
18	Safe Democratic	Safe Democratic	44	Safe Democratic	Safe Democratic
19	Safe Democratic	Safe Democratic	45	Lean Democratic	Safe Democratic
20	Safe Republican	Safe Republican	46	Safe Democratic	Safe Democratic
21	Safe Democratic	Safe Democratic	47	Lean Democratic	Safe Democratic
22	Lean Democratic	Lean Democratic	48	Safe Republican	Lean Democratic
23	Safe Republican	Safe Republican	49	Safe Democratic	Safe Democratic
24	Safe Democratic	Safe Democratic	50	Safe Democratic	Safe Democratic
25	Safe Democratic	Safe Democratic	51	Safe Democratic	Safe Democratic
26	Safe Democratic	Safe Democratic	52	Safe Democratic	Safe Democratic

Ex. 528

California Congressional
Adopted 2021 - 2025 Data

REDISTRICTING PARTNERS



CALIFORNIA CONGRESSIONAL MID-DECADE REDISTRICTING

REDISTRICTING PARTNERS

CA MID-DECADE REDISTRICTING

The effort undertaken do adjust the Congressional District Boundaries adopted by the California Citizens Redistricting Commission keeps fidelity with the 2021 Process

- **US Constitutional / Federal Law** – Equal Population / VRA
- **Contiguity** – literal and functional criteria
- **Communities of Interest** - Must preserve identified communities of interest when possible.
- **Cities and Counties** - Respect city and county boundaries
- **Compactness** - Districts should not bypass nearby populations to grab distant ones.

REDISTRICTING PARTNERS

CA MID-DECADE REDISTRICTING

Adjustments to the California Congressional Districts will be supported by multiple types of evidence:

- Actual 2021 CRC Commissioner testimony on draft maps or instructions for mapping options given to staff
- Public maps presented to the commission
- Public testimony to the commission
- Draft or completed 2021 or 2011 Commission maps.

REDISTRICTING PARTNERS

MINIMIZE DISRUPTION

These maps are an ADJUSTMENT of the existing Citizens Redistricting Commission drawn maps.

- 10 districts are not touched at all, another 12 have less than 5% change.
- There are no changes to any of the historic black districts in Los Angeles or Oakland.
- No changes were made to the map that were not consistent with the goals set forward by the delegation – pushing back on the mid-decade redistricting plans from Texas and other states.

REDISTRICTING PARTNERS

MINIMIZE DISRUPTION

These maps are an ADJUSTMENT of the existing Citizens Redistricting Commission drawn maps.

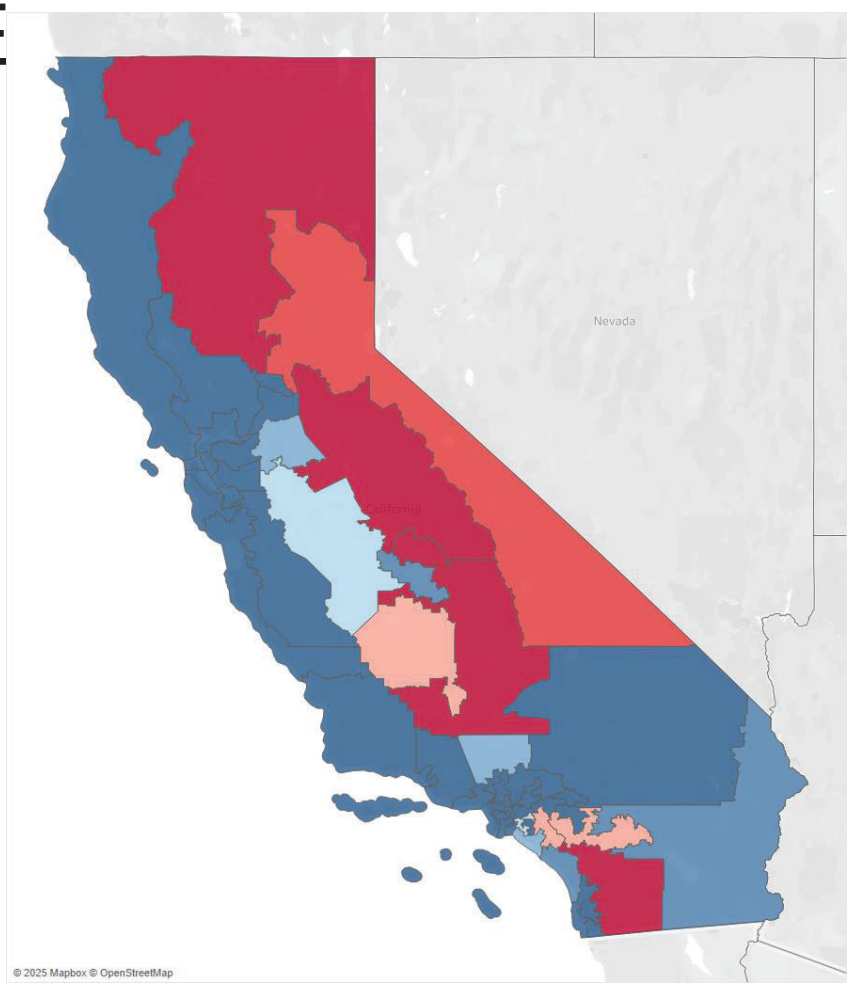
- The three districts with highest Asian CVAP are preserved and work was done in CA45 to improve that community of interest, we have received data from the Asian Law Caucus to assist in these efforts.

- For purposes partisan impact we considered performance of Latinos in Democratic seats and used Harris/Trump in concert with other metrics to make sure there was not a new Latino voter trend that could be masked by using older data.

REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

- The current map has several swing, likely and lean Democratic contests, with seven seats that Democrats won in 2018 and have fought to hold and/or win back in subsequent elections.

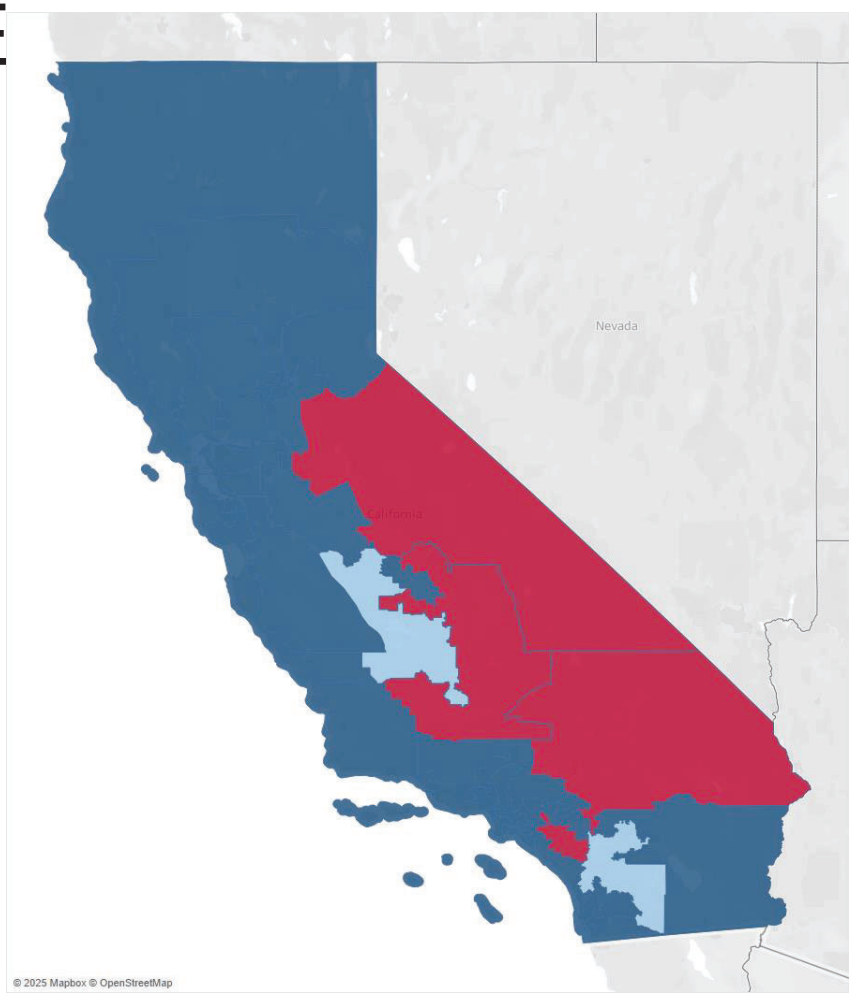


REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

- The existing map had five seats needing significant resources to defend, with real vulnerability for frontliners and only one or two chances for a pickup in 2026

- Into one that puts California on track to win 48 Democratic seats in 2026

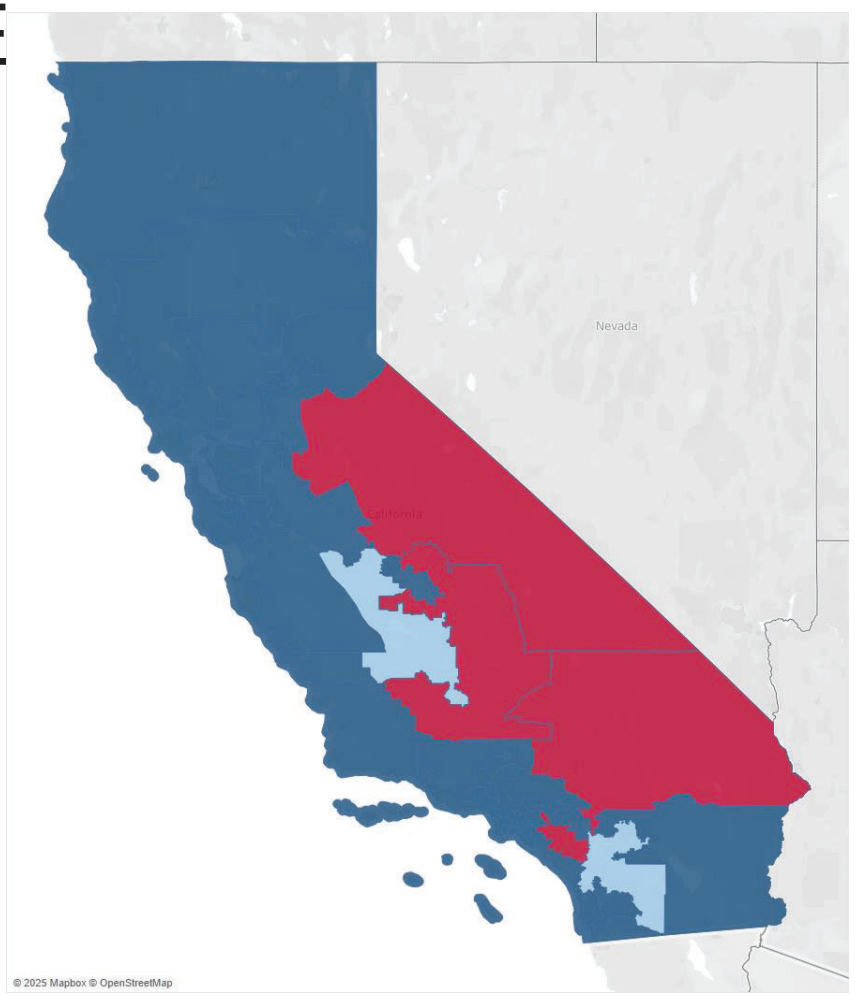


REDISTRICTING PARTNERS

ELECTORAL PERFORMANCE

- The new map creates FIVE new Democratic pickup opportunities, including one district that is moved entirely from conservative Riverside County to the most Latino communities in Los Angeles (Calvert)

- This new map can also bolster frontline Democrats, moving five seats in a stronger position going into 2026, moving two seats that Trump won into Harris Victories.

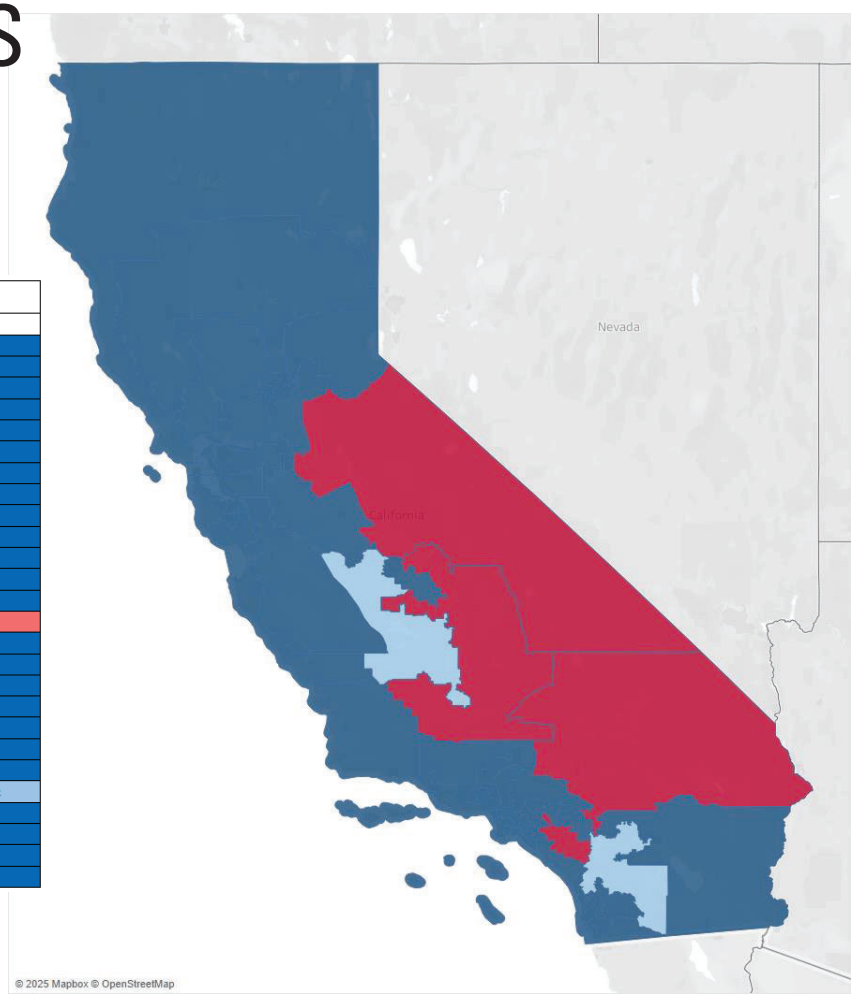


REDISTRICTING PARTNERS

PARTISAN IMPROVEMENTS

Statewide Partisan Lean		
District	Current	Submission
1	Safe Republican	Safe Democratic
2	Safe Democratic	Safe Democratic
3	Safe Republican	Safe Democratic
4	Safe Democratic	Safe Democratic
5	Safe Republican	Safe Republican
6	Safe Democratic	Safe Democratic
7	Safe Democratic	Safe Democratic
8	Safe Democratic	Safe Democratic
9	Lean Democratic	Safe Democratic
10	Safe Democratic	Safe Democratic
11	Safe Democratic	Safe Democratic
12	Safe Democratic	Safe Democratic
13	Lean Republican	Safe Democratic
14	Safe Democratic	Safe Democratic
15	Safe Democratic	Safe Democratic
16	Safe Democratic	Safe Democratic
17	Safe Democratic	Safe Democratic
18	Safe Democratic	Safe Democratic
19	Safe Democratic	Safe Democratic
20	Safe Republican	Safe Republican
21	Safe Democratic	Safe Democratic
22	Lean Democratic	Lean Democratic
23	Safe Republican	Safe Republican
24	Safe Democratic	Safe Democratic
25	Safe Democratic	Safe Democratic
26	Safe Democratic	Safe Democratic

Statewide Partisan Lean		
District	Current	Submission
27	Lean Democratic	Safe Democratic
28	Safe Democratic	Safe Democratic
29	Safe Democratic	Safe Democratic
30	Safe Democratic	Safe Democratic
31	Safe Democratic	Safe Democratic
32	Safe Democratic	Safe Democratic
33	Safe Democratic	Safe Democratic
34	Safe Democratic	Safe Democratic
35	Safe Democratic	Safe Democratic
36	Safe Democratic	Safe Democratic
37	Safe Democratic	Safe Democratic
38	Safe Democratic	Safe Democratic
39	Safe Democratic	Safe Democratic
40	Safe Republican	Safe Republican
41	Safe Republican	Safe Democratic
42	Safe Democratic	Safe Democratic
43	Safe Democratic	Safe Democratic
44	Safe Democratic	Safe Democratic
45	Lean Democratic	Safe Democratic
46	Safe Democratic	Safe Democratic
47	Lean Democratic	Safe Democratic
48	Safe Republican	Lean Democratic
49	Safe Democratic	Safe Democratic
50	Safe Democratic	Safe Democratic
51	Safe Democratic	Safe Democratic
52	Safe Democratic	Safe Democratic



REDISTRICTING PARTNERS

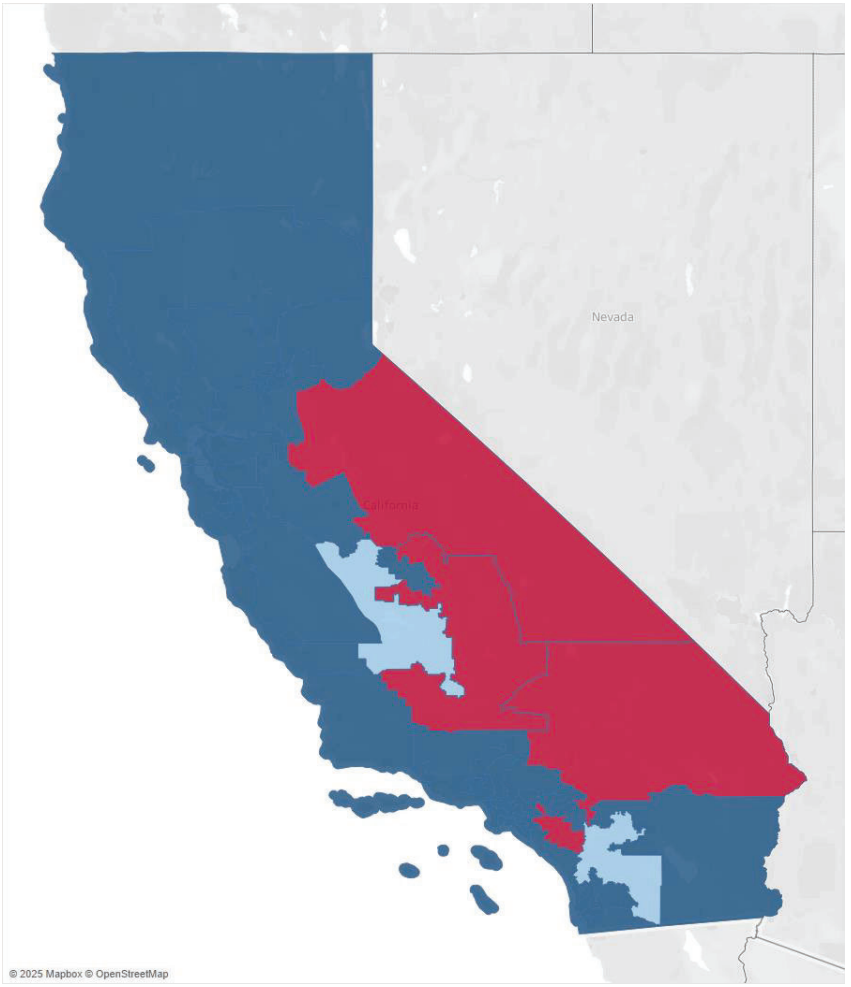
Statewide Partisan Lean		
District	Current	Submission
1	Safe Republican	Safe Democratic
2	Safe Democratic	Safe Democratic
3	Safe Republican	Safe Democratic
4	Safe Democratic	Safe Democratic
5	Safe Republican	Safe Republican
6	Safe Democratic	Safe Democratic
7	Safe Democratic	Safe Democratic
8	Safe Democratic	Safe Democratic
9	Lean Democratic	Safe Democratic
10	Safe Democratic	Safe Democratic
11	Safe Democratic	Safe Democratic
12	Safe Democratic	Safe Democratic
13	Lean Republican	Safe Democratic
14	Safe Democratic	Safe Democratic
15	Safe Democratic	Safe Democratic
16	Safe Democratic	Safe Democratic
17	Safe Democratic	Safe Democratic
18	Safe Democratic	Safe Democratic
19	Safe Democratic	Safe Democratic
20	Safe Republican	Safe Republican
21	Safe Democratic	Safe Democratic
22	Lean Democratic	Lean Democratic
23	Safe Republican	Safe Republican
24	Safe Democratic	Safe Democratic
25	Safe Democratic	Safe Democratic
26	Safe Democratic	Safe Democratic

Statewide Partisan Lean		
District	Current	Submission
27	Lean Democratic	Safe Democratic
28	Safe Democratic	Safe Democratic
29	Safe Democratic	Safe Democratic
30	Safe Democratic	Safe Democratic
31	Safe Democratic	Safe Democratic
32	Safe Democratic	Safe Democratic
33	Safe Democratic	Safe Democratic
34	Safe Democratic	Safe Democratic
35	Safe Democratic	Safe Democratic
36	Safe Democratic	Safe Democratic
37	Safe Democratic	Safe Democratic
38	Safe Democratic	Safe Democratic
39	Safe Democratic	Safe Democratic
40	Safe Republican	Safe Republican
41	Safe Republican	Safe Democratic
42	Safe Democratic	Safe Democratic
43	Safe Democratic	Safe Democratic
44	Safe Democratic	Safe Democratic
45	Lean Democratic	Safe Democratic
46	Safe Democratic	Safe Democratic
47	Lean Democratic	Safe Democratic
48	Safe Republican	Lean Democratic
49	Safe Democratic	Safe Democratic
50	Safe Democratic	Safe Democratic
51	Safe Democratic	Safe Democratic
52	Safe Democratic	Safe Democratic

REDISTRICTING PARTNERS

TEAM EFFORT

- No current member of Congress is being placed at risk as a result of this redistricting effort, as that would not support goals. But this is <u>not</u> an incumbent preference gerrymander.
- A number of districts made significant changes with over 40% of their current voter population used to support this effort.
- Several members were moved out of their “Home Base” and will be learning new communities.

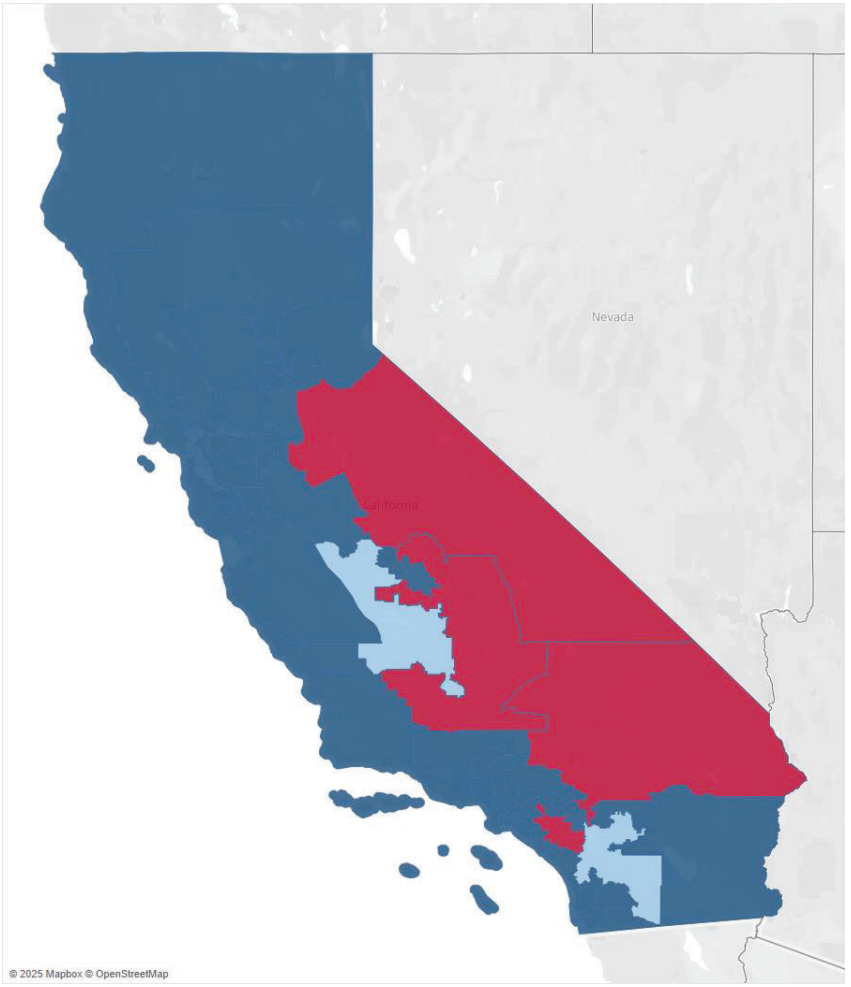


REDISTRICTING PARTNERS

KEY REGIONS

For the purposes of achieving the partisan goals, we focused on specific parts of the state that create opportunities.

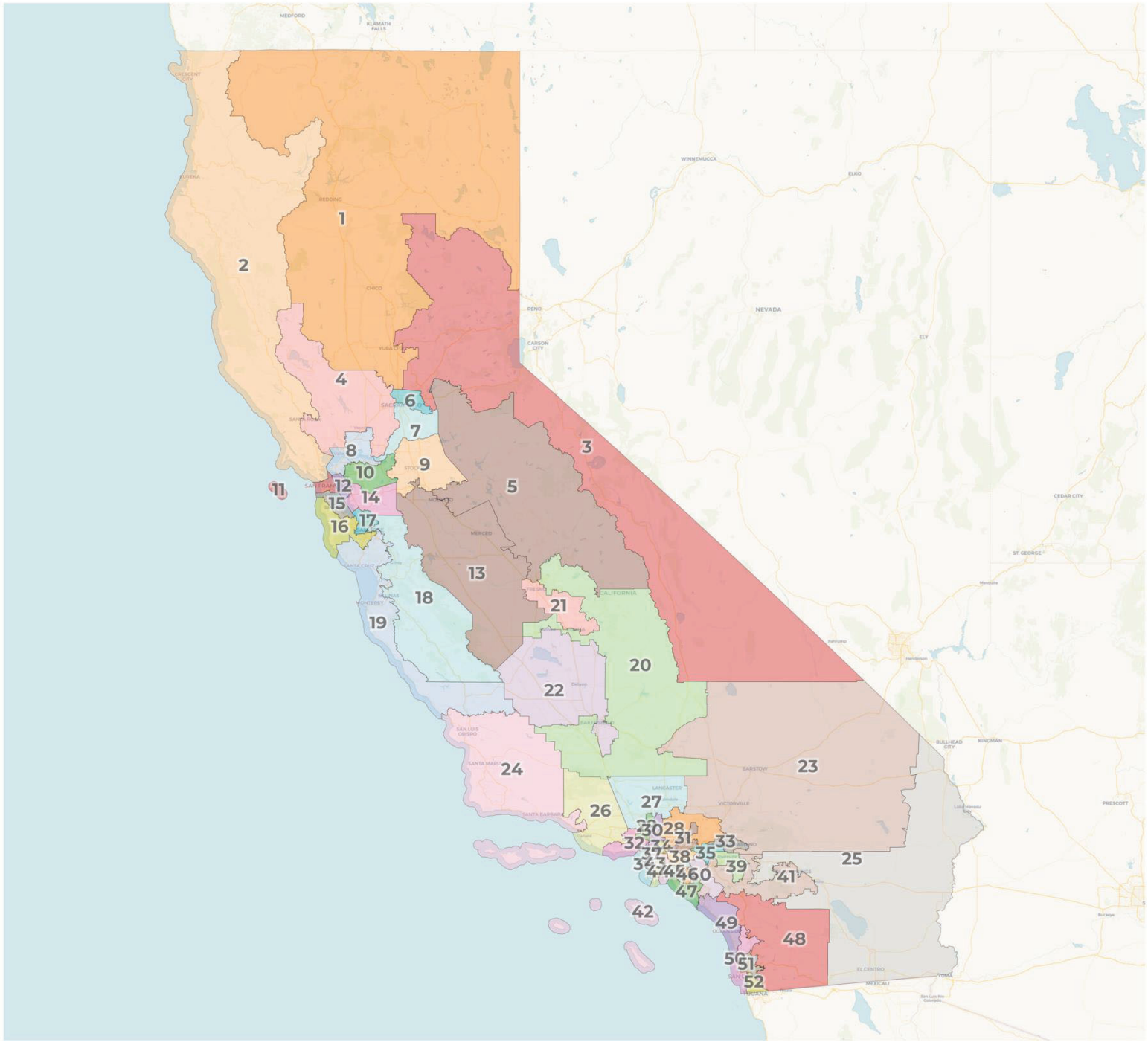
- Northern California
- Sacramento Region
- Central Valley
- Los Angeles
- Orange County
- Inland Empire
- San Diego



REDISTRICTING PARTNERS

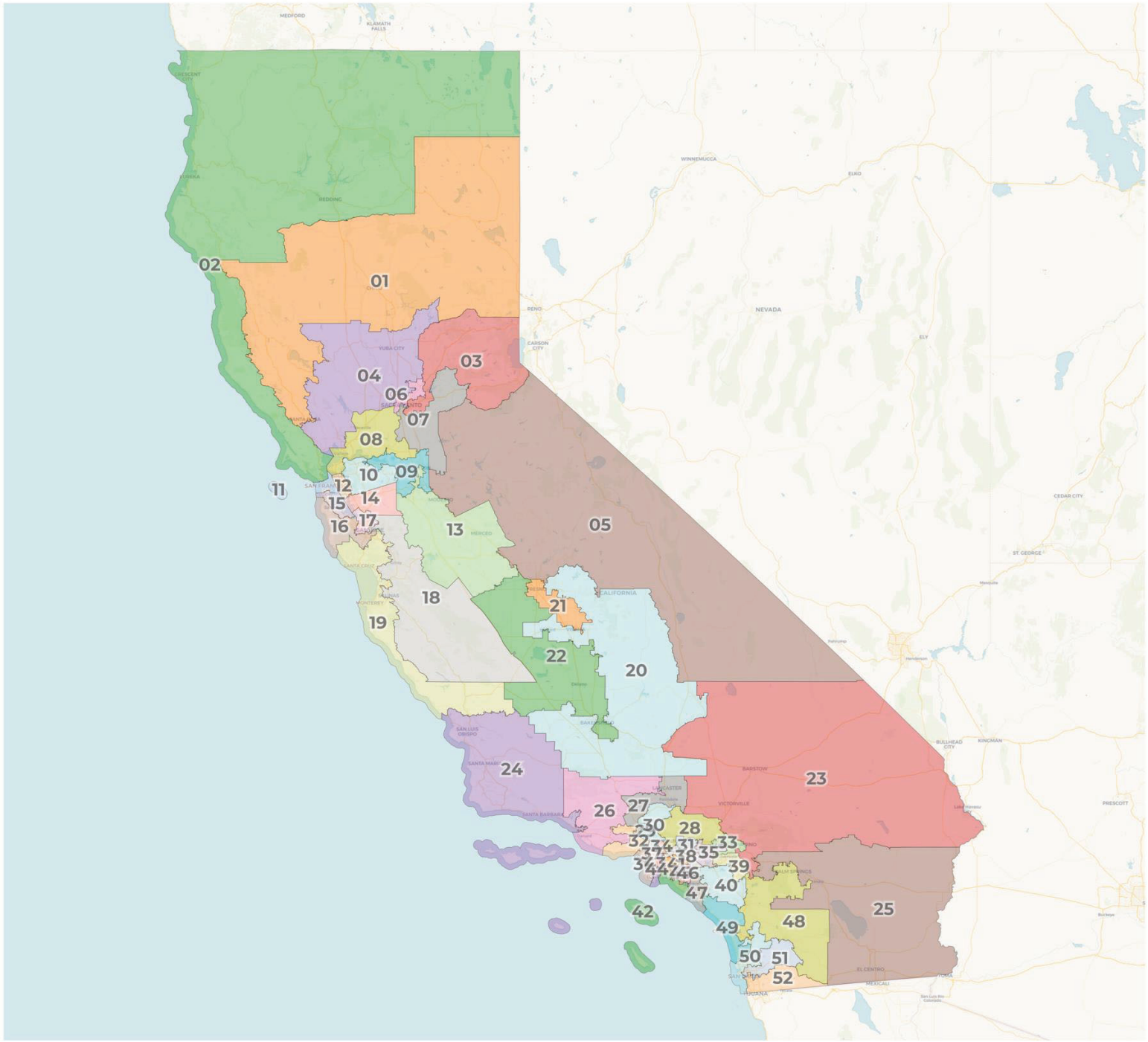
California Congressional

2021 Adopted Plan



REDISTRICTING PARTNERS

California Congressional
Public Submission



REDISTRICTING PARTNERS

CA Congressional

2021 CRC Lines - Northern California

REDISTRICTING PARTNERS

CA Congressional

Draft Plan H4 - NorCal

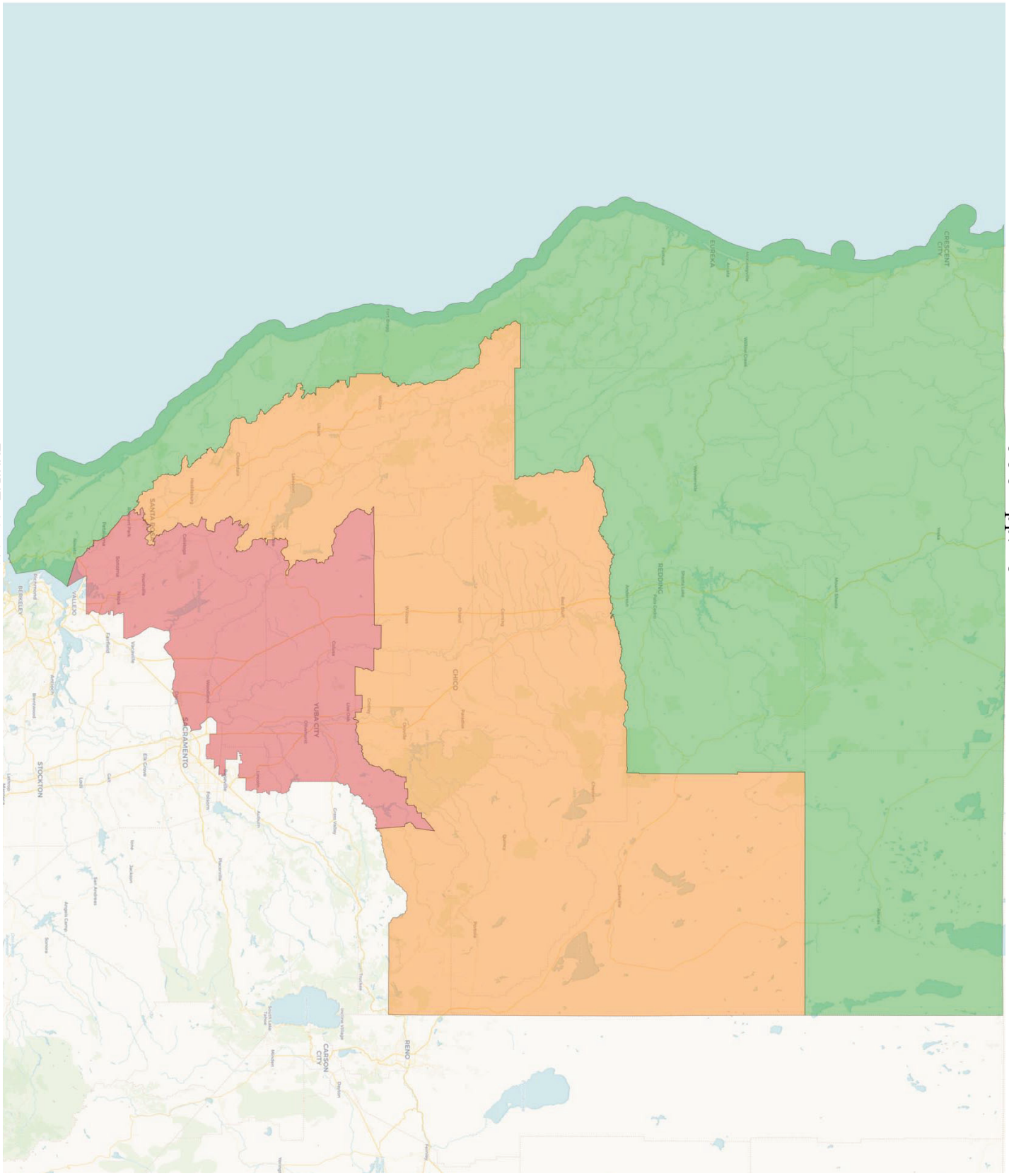


EXHIBIT 528 - 016

DCCC App. 481

REDISTRICTING PARTNERS

CA Congressional

2021 CRC Lines - Sa

REDISTRICTING PARTNERS

CA Congressional

Draft Plan H4 - Sac Metro

REDISTRICTING PARTNERS

CA Congressional

2021 CRC Lines - Tri Valley

REDISTRICTING PARTNERS

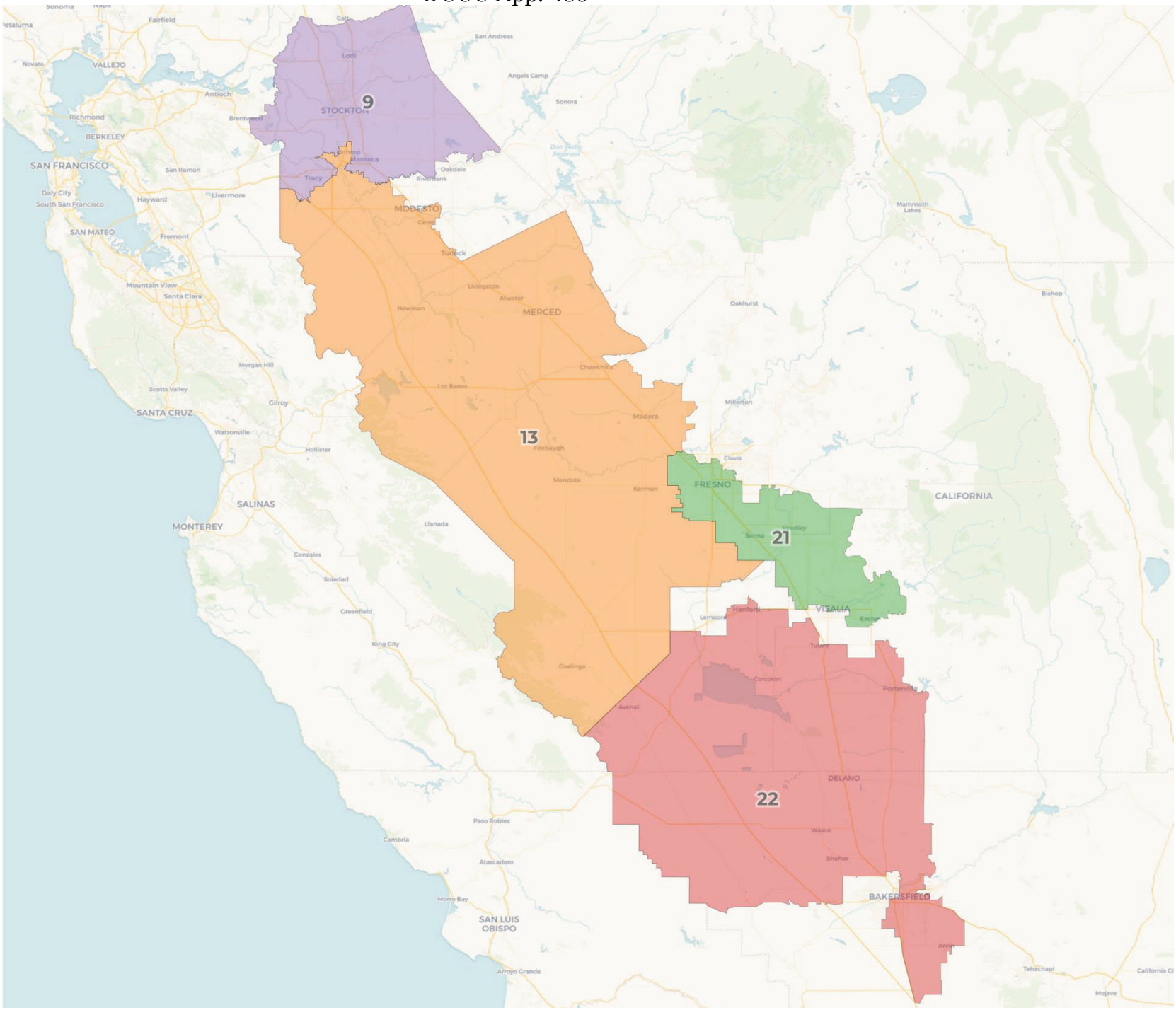
CA Congressional

Draft Plan H4 - Tri Valley

REDISTRICTING PARTNERS

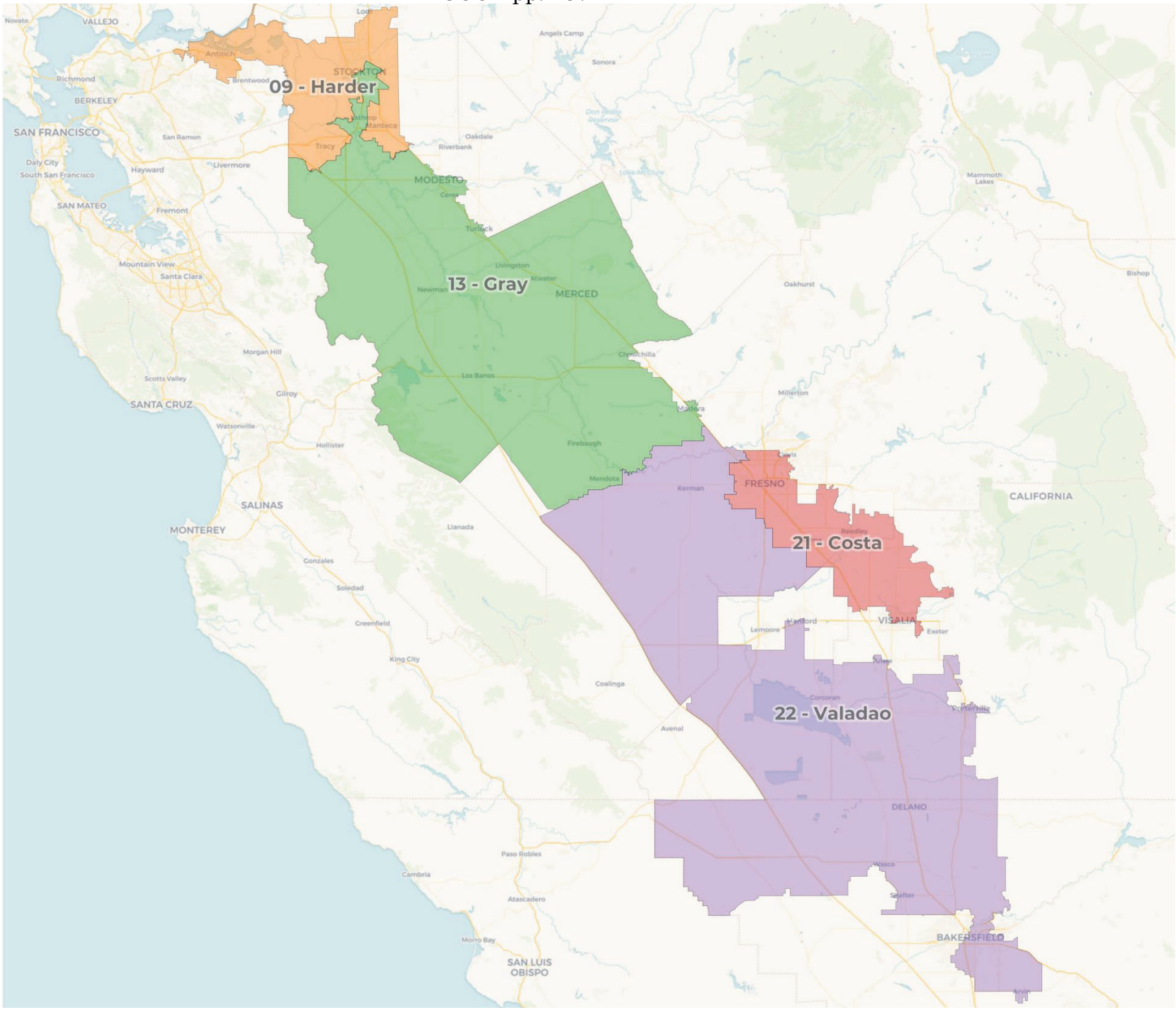
CA Congressional

2021 CRC Lines - Central Valley



REDISTRICTING PARTNERS

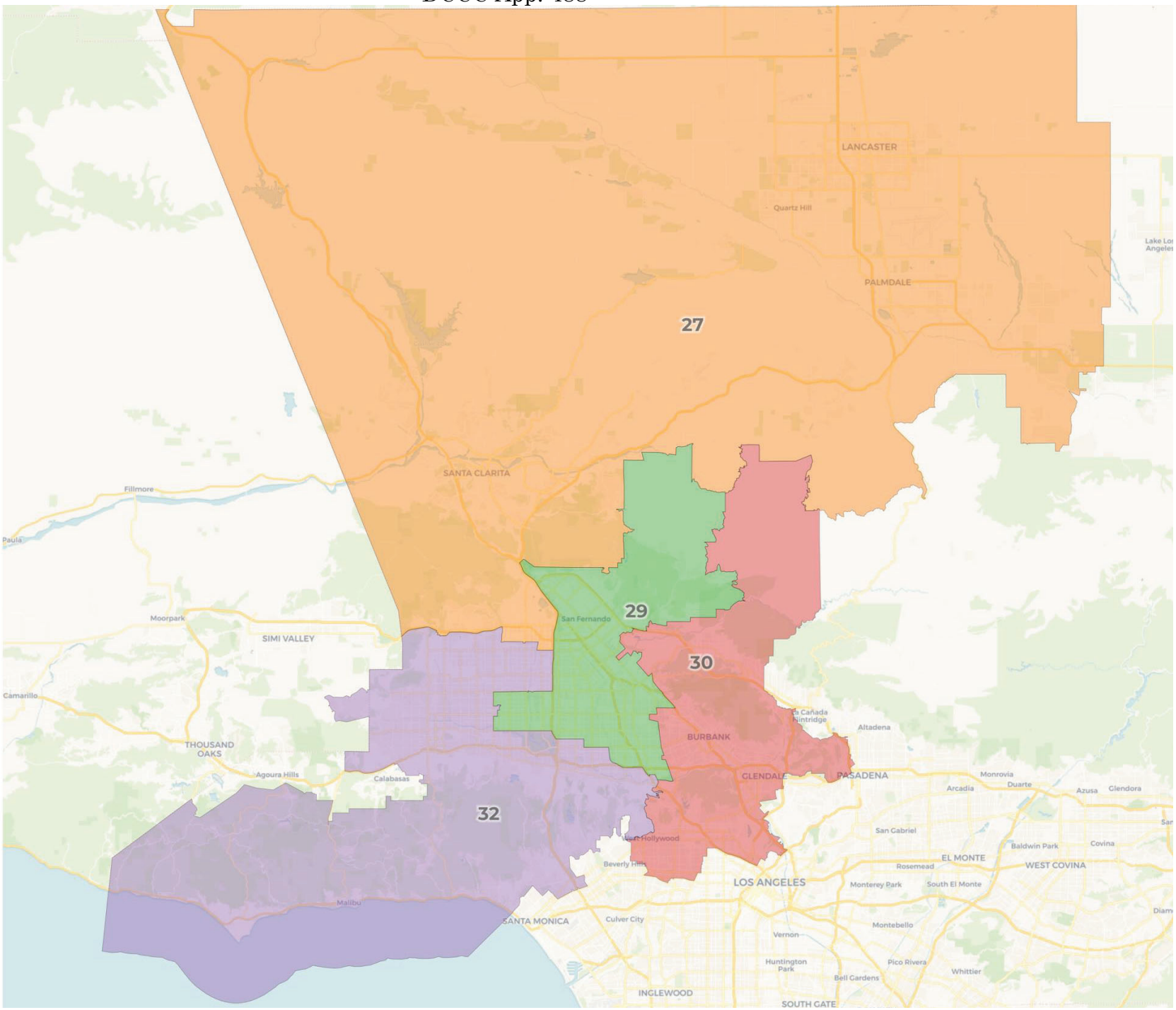
California Congressional
Public Submission - Central Valley



REDISTRICTING PARTNERS

CA Congressional

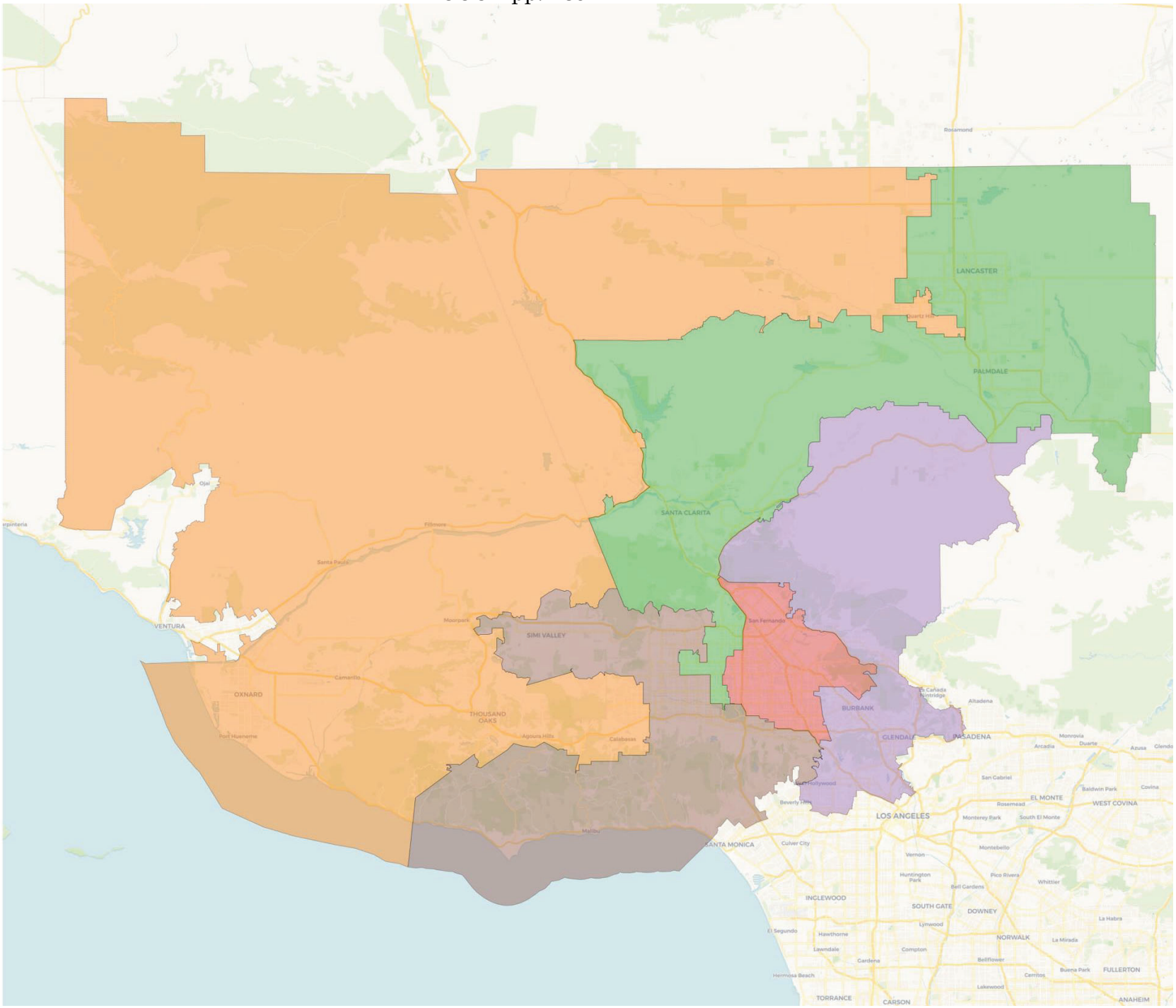
2021 CRC Lines - San Fernando Valley



REDISTRICTING PARTNERS

CA Congressional

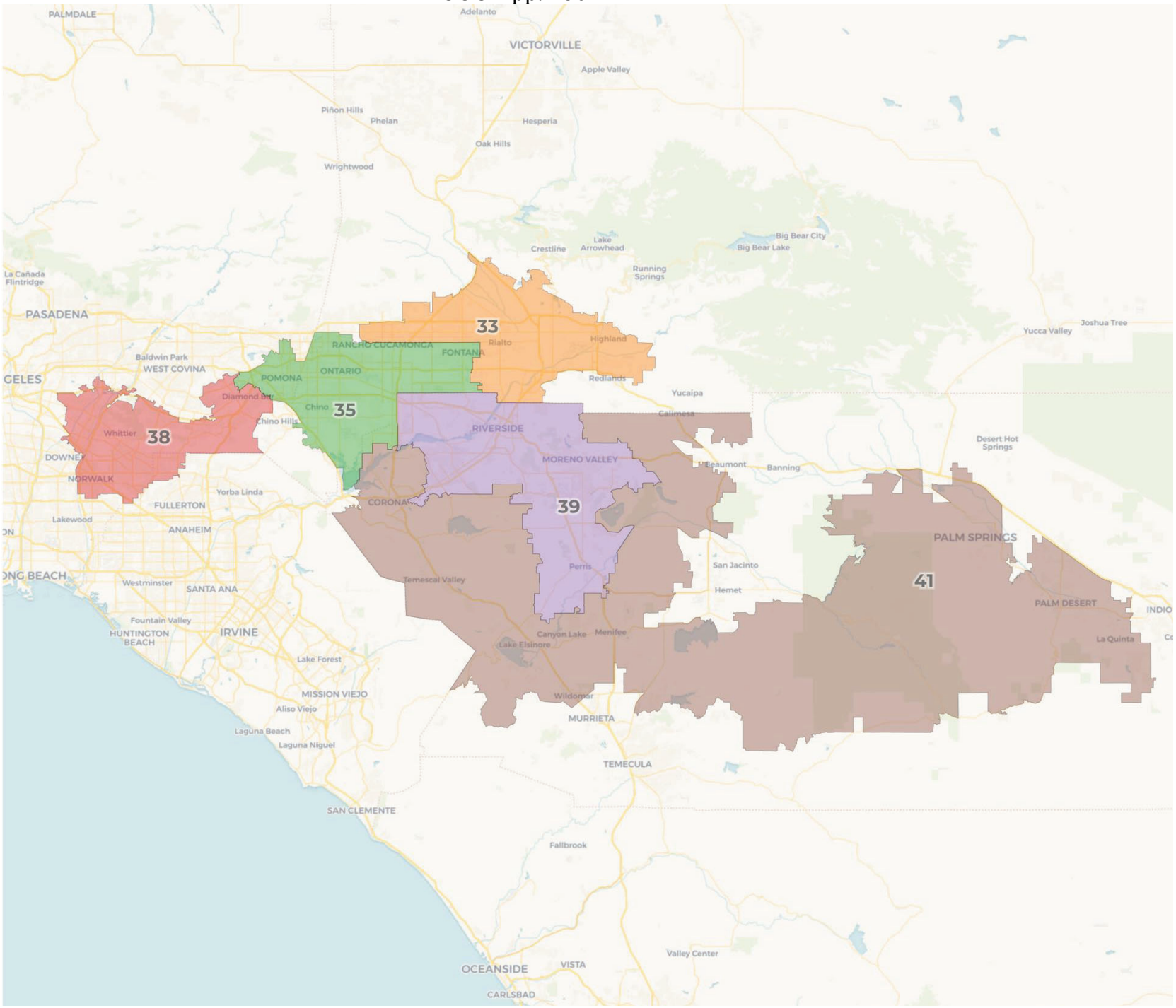
Draft Plan H4 - SFV



REDISTRICTING PARTNERS

CA Congressional

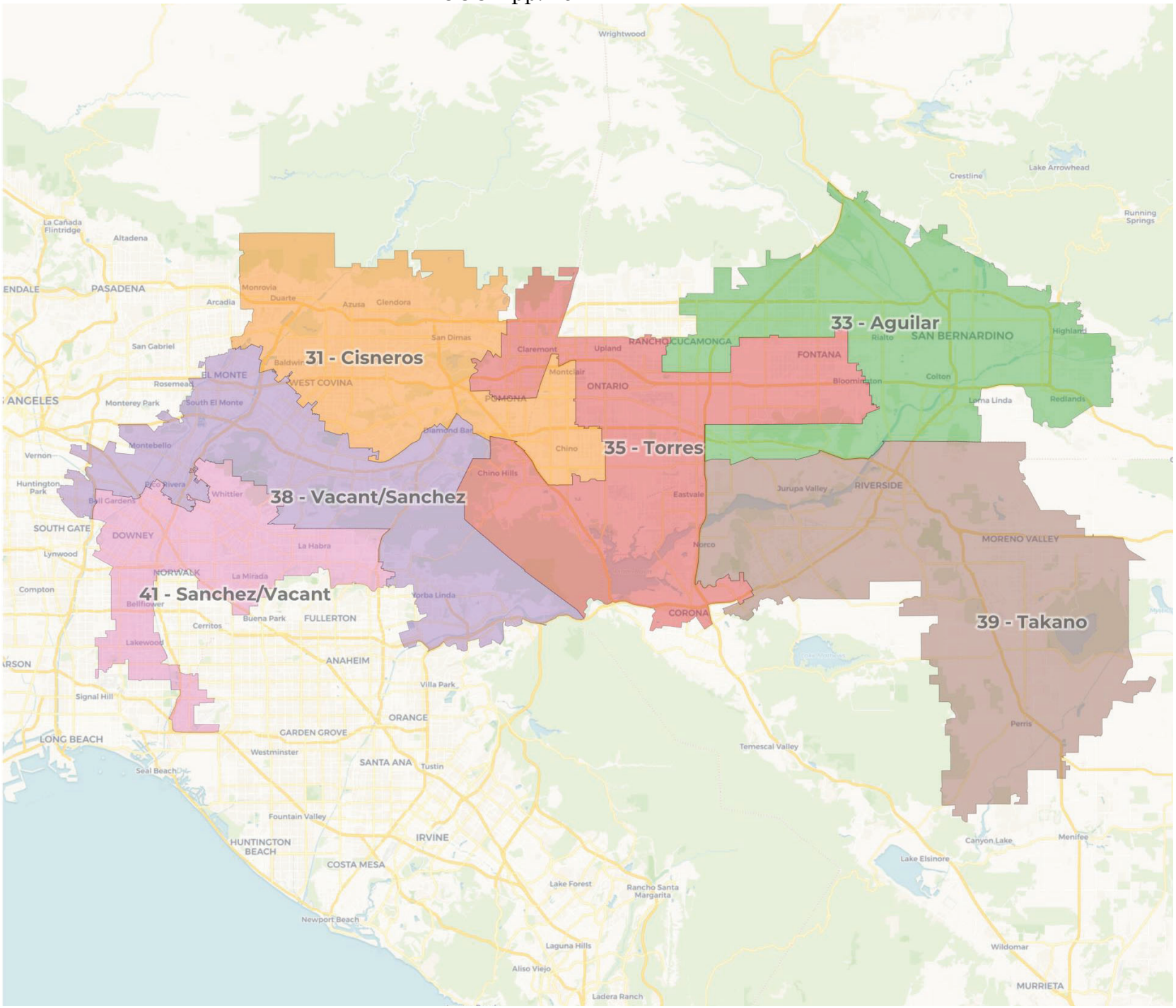
2021 CRC Lines - Inland Empire/Los Angeles



California Congressional

Public Submission - LA / IE

REDISTRICTING PARTNERS



REDISTRICTING PARTNERS

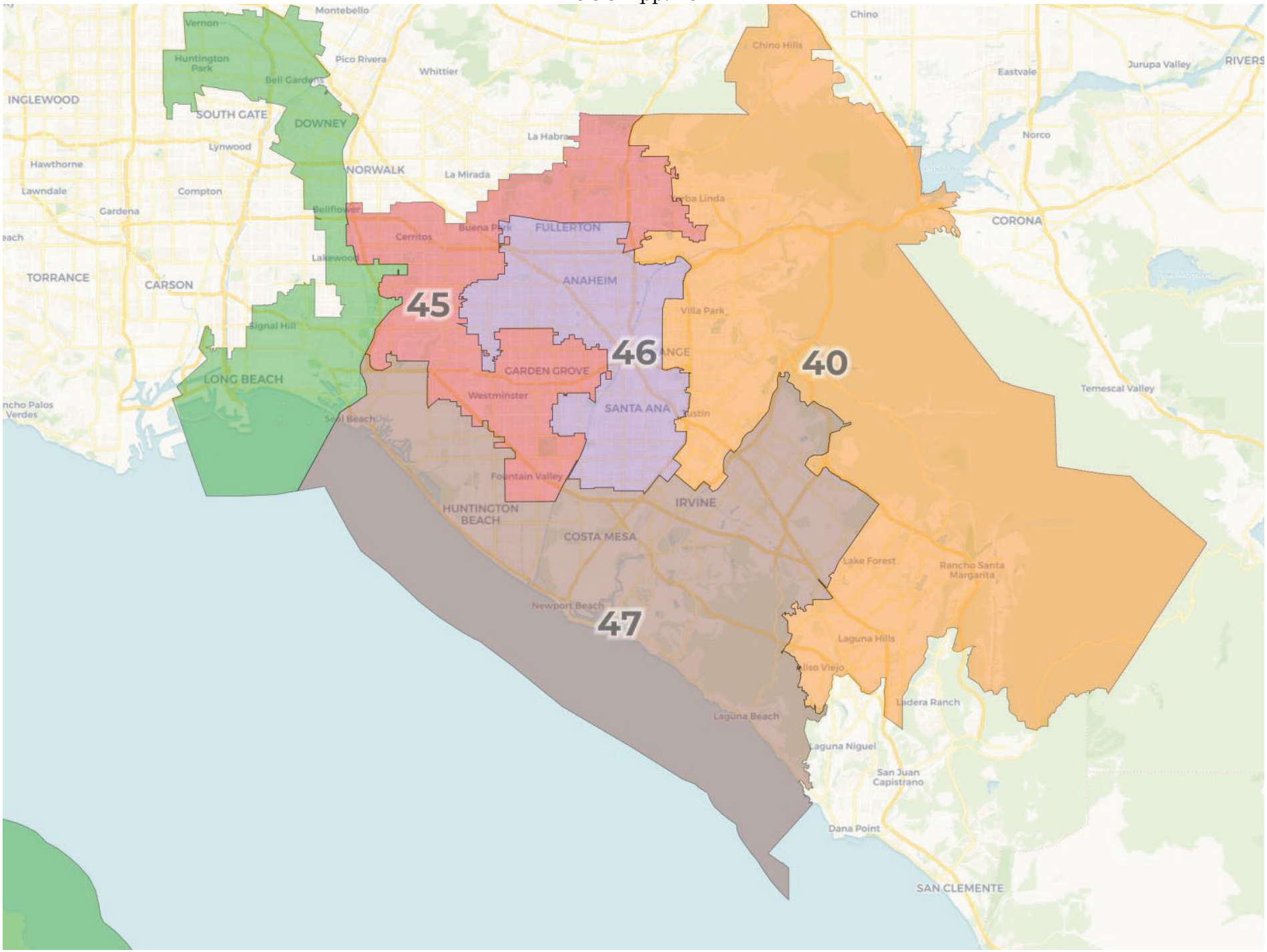
CA Congressional

2021 CRC Lines - Orange County/LBC

REDISTRICTING PARTNERS

CA Congressional

2021 CRC Lines - Orange County/LBC


45
46
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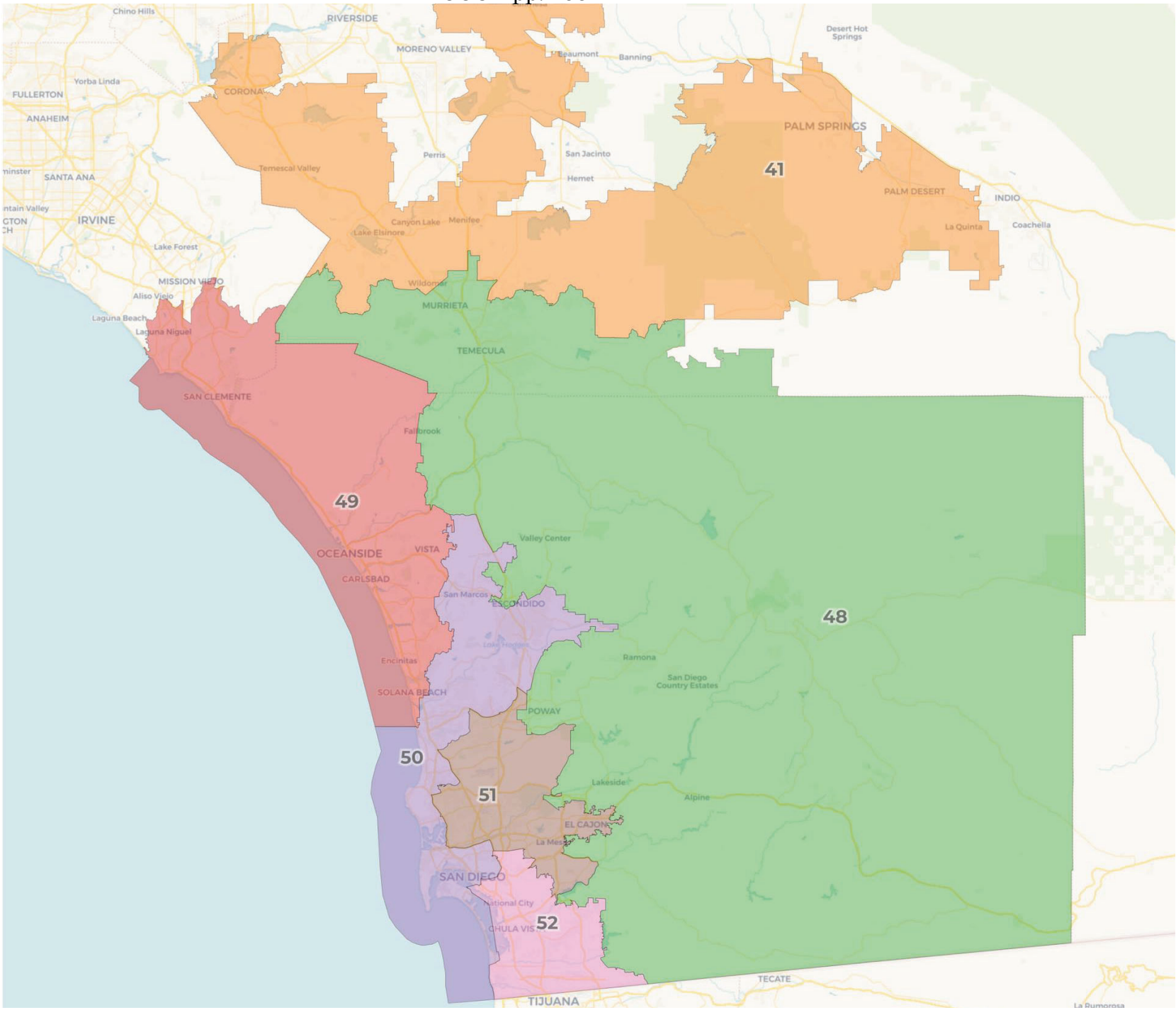
Montebello
Vernon
Huntington Park
Pico Rivera
Whittier
Chino
Chino Hills
Eastvale
Jurupa Valley
RIVERS
INGLEWOOD
SOUTH GATE
Bell Gardens
DOWNEY
Lynwood
La Habra
Norco
Hawthorne
NORWALK
La Mirada
Lawndale
Compton
Gardena
Bellflower
Buena Park
FULLERTON
Cerritos
CORONA
Lakewood
TORRANCE
CARSON
ANAHEIM
Villa Park
Signal Hill
LONG BEACH
GARDEN GROVE
Westminster
SANTA ANA
Temescal Valley
Seal Beach
Fountain Valley
IRVINE
HUNTINGTON BEACH
COSTA MESA
Lake Forest
Rancho Santa Margarita
Newport Beach
Laguna Hills
Laguna Beach
Ladera Ranch
Laguna Niguel
San Juan Capistrano
Dana Point
SAN CLEMENTE

REDISTRICTING PARTNERS

CA Congressional

2021 CRC Lines - San Diego/Riverside



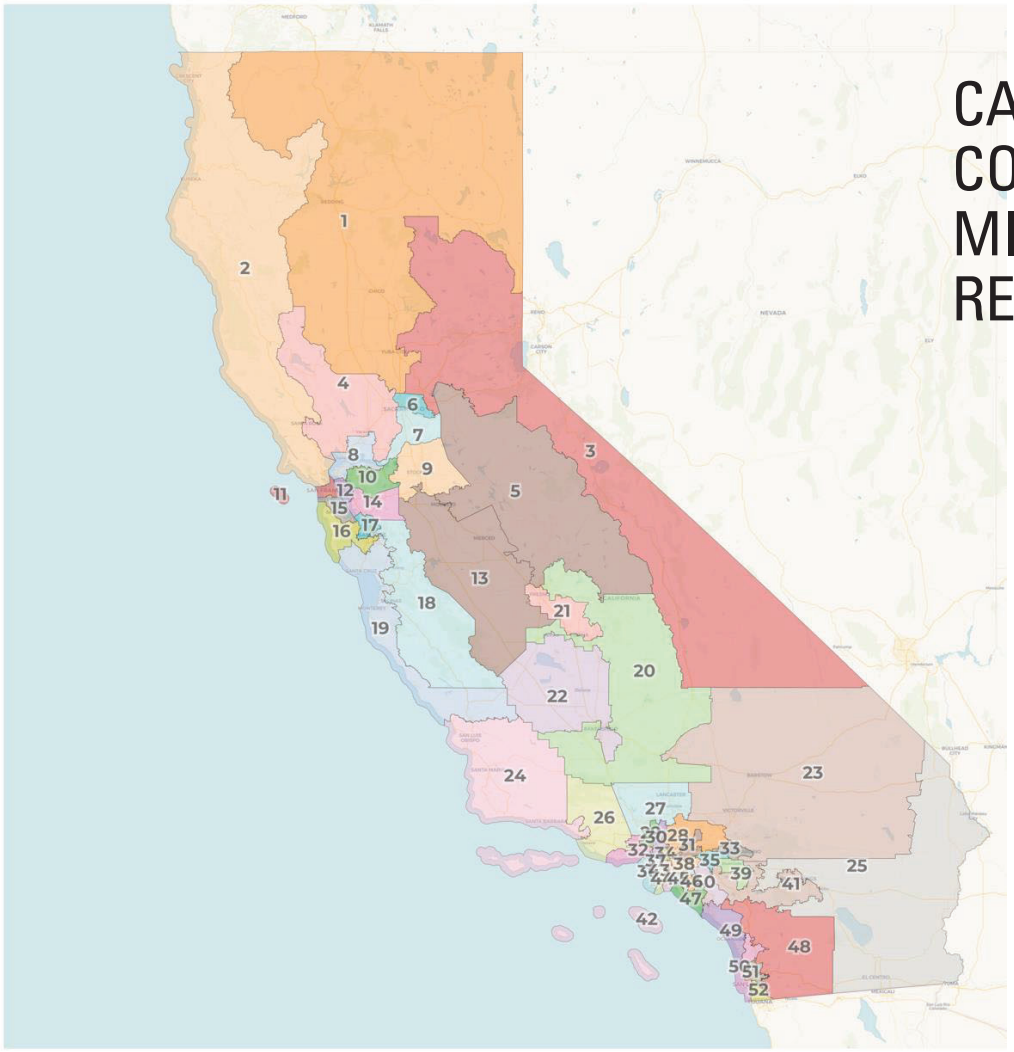
REDISTRICTING PARTNERS

CA Congressional

Draft Plan H4 - SD Riverside

California Congressional
Adopted 2021 - 2025 Data

REDISTRICTING PARTNERS



CALIFORNIA CONGRESSIONAL MID-DECADE REDISTRICTING