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By: *[Signature]*  
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ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FILED IN CLERK'S OFFICE  
U.S.D.C. - Atlanta

AUG 6 2003

LUTHER O. GRIFFIN, Clerk  
By: *[Signature]*  
Deputy Clerk

SARA LARIOS, WHIT AYRES, §  
VIRGINIA A. BALFOUR, §  
GEORGIA BENTON, PAM §  
BOHANNON, MERRI BRANTLEY, §  
JOEY BRUSH, CRAIG BURNS, §  
ASHLENE CORR, DONALD CORR, §  
ROBERT F. DALLAS, RETA DODD, §  
P. MARTIN ELLARD, SETH HARP, §  
DAVID MARKEY, FELIX MORING, §  
ROBERT H. OWEN, SR., LINDA §  
PARKER, CHARLES PAYNE, JR., §  
ROY ROBERTS, NANCY §  
SCHAEFER, AUSTIN SCOTT, §  
BOB TANGO, DEBBIE TANGO, §  
CHARLIE TANKSLEY, DON §  
THOMAS, MARC TYSON, JACK §  
WILLIAMSON and DAVID YOUNG; §  
PLAINTIFFS, §

v. §

GEORGE E. "SONNY" PERDUE, in §  
his official capacity as Governor §  
of Georgia; TERRY COLEMAN, in his §  
official capacity as Speaker of the House §  
of Representatives of Georgia; ERIC B. §  
JOHNSON, in his official capacity as §  
President Pro Tem of the Georgia State §  
Senate; and CATHY COX, §  
in her official capacities as Secretary of §  
State of Georgia and Chair of the State §  
Election Board, §  
DEFENDANTS. §

CIVIL ACTION FILE

NO. 1:03-CV-0693 (CAP)

54

PLAINTIFS' FIRST AMENDED COMPLAINT FOR DECLARATORY,  
INJUNCTIVE AND OTHER RELIEF

COME NOW SARA LARIOS, WHIT AYRES, VIRGINIA A. BALFOUR, GEORGIA BENTON, PAM BOHANNON, MERRI BRANTLEY, JOEY BRUSH, CRAIG BURNSED, ASHLENE CORR, DONALD CORR, ROBERT F. DALLAS, RETA DODD, P. MARTIN ELLARD, SETH HARP, DAVID MARKEY, FELIX MORING, ROBERT H. OWEN, SR., LINDA PARKER, CHARLES PAYNE, JR., ROY ROBERTS, NANCY SCHAEFER, AUSTIN SCOTT, BOB TANGO, DEBBIE TANGO, CHARLIE TANKSLEY, DON THOMAS, MARC TYSON, JACK WILLIAMSON AND DAVID YOUNG, all Plaintiffs in the above-styled action (“Plaintiffs”), and, for their First Amended Complaint for Declaratory, Injunctive and other Relief, show this Court as follows:

NATURE OF THE CASE

1.

This is an action challenging the validity, under both the United States Constitution and federal statutes, of Georgia’s Congressional Representative districts (“the current Congressional redistricting plan”) and the constitutionality of the current electoral representational plans for the Georgia Senate and the Georgia House of Representatives (collectively, “the current state legislative redistricting

Republican voters and Representatives solely because of their party affiliation and political beliefs; and (4) the continued use of the districts in the current Congressional and state legislative redistricting plans cannot be justified as furthering any legitimate state interest and is therefore unconstitutional. Upon such declarations, Plaintiffs request injunctive relief, prohibiting further qualifications or elections from being conducted under the current Congressional and state legislative redistricting plans. Plaintiffs further request that, in the event that constitutional plans are not enacted and precleared under 42 U.S.C. § 1973c in sufficient time for 2004 candidate qualifying period and elections to proceed according to the statutory schedule, the Court formulate and implement redistricting plans for Georgia's Congressional and state legislative districts that comport with constitutional and statutory requirements. Finally, Plaintiffs seek their costs and attorney's fees pursuant to 42 U.S.C. §1988.

#### STATEMENT OF JURISDICTION

2.

This action arises under Article I, § 2 and Article IV, §2 of the United States Constitution, the First and Fourteenth Amendments to the United States Constitution, 2 U.S.C. §§ 2a, 2b and 2c and 28 U.S.C. §§2201 and 2202. This action is brought under 42 U.S.C. §§ 1983 and 1988.

3.

This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331, 1343(a)(3) and (4), 1983, 2201, 2202 and 2284.

4.

Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) and Local Rule 3.1B(1).

5.

A three-judge court is required pursuant to 28 U.S.C. § 2284(a) because this action challenges the constitutionality of the apportionment of Georgia's Congressional and state legislative districts. In this Complaint and by separate pleading, Plaintiffs request the appointment of a three-judge court.

6.

Plaintiffs have complied with the provisions of O.C.G.A. § 21-2-32(g) by providing a copy of this action to the Chair of the Georgia State Election Board via certified mail, in addition to personal service. A copy has also been served upon the Georgia Attorney General by certified mail.

PARTIES

7.

Plaintiff Sara Larios is a Republican, a registered voter of the State of Georgia and resides in the Eighth Congressional District, Georgia Senate District 17 and Georgia House of Representatives District 48. Georgia Senate District 17 has a population deviation of 4.97% and Georgia House of Representatives District 48 is a multimember district with a population deviation of -.27%. Plaintiff Larios desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Larios is white.

8.

Plaintiff Whit Ayres is a registered voter of the State of Georgia and resides in the Sixth Congressional District, Georgia Senate District 56 and Georgia House of Representatives District 40. Georgia Senate District 56 has a population deviation of 4.97% and Georgia House of Representatives District 40 is a single member district with a population deviation of 4.17%. Plaintiff Ayres desires to participate in the electoral and political processes of the State on the basis of

equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Ayres is white.

9.

Plaintiff Virginia Ann Balfour is a registered voter of the State of Georgia and resides in the Seventh Congressional District, Georgia Senate District 09 and Georgia House of Representatives District 70. Georgia Senate District 09 has a population deviation of 4.98% and Georgia House of Representatives District 70 is a multimember district with a population deviation of 3.05%. Plaintiff Balfour desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Balfour is white.

10.

Plaintiff Georgia Benton is a registered voter of the State of Georgia and resides in the Twelfth Congressional District, Georgia Senate District 2 and Georgia House of Representatives District 123. The Twelfth Congressional District is overpopulated by 8 people; Georgia House of Representatives District

Plaintiff Merri Brantley is a Republican, a registered voter of the State of Georgia and resides in the Seventh Congressional District, Georgia Senate District 48 and Georgia House of Representatives District 64. Georgia Senate District 48 has a population deviation of 4.79% and Georgia House of Representatives District is a single member district with a population deviation of 4.79%. Plaintiff Brantley desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Brantley is white.

13.

Plaintiff Joey Brush is a Republican, a registered voter of the State of Georgia and resides in the Ninth Congressional District, Georgia Senate District 24 and Georgia House of Representatives District 79. Plaintiff Brush is the State Senator for Senate District 24. The Ninth Congressional District is overpopulated by 35 people; Georgia Senate District 24 has a population deviation of 4.25% and Georgia House of Representatives District 79 is a single member district with a population deviation of -1.56%. Plaintiff Brush desires to participate in the electoral and political processes of the State on the basis of equality with other

citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Brush is white.

14.

Plaintiff Craig Burnsed is a registered voter of the State of Georgia and resides in the Seventh Congressional District, Georgia Senate District 30 and Georgia House of Representative District 26. Georgia Senate District 30 has a population deviation of 4.91% and Georgia House of Representatives District 26 is a single member district with a population deviation of 4.79%. Plaintiff Burnsed desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Burnsed is white.

15.

Plaintiff Bob Clarke is a Republican, a registered voter of the State of Georgia and resides in the Tenth Congressional District, Georgia Senate District 53 and Georgia House of Representatives District 01. Georgia Senate District 53 has a population deviation of 4.97% and Georgia House of Representatives District 01

24.

Plaintiff Robert H. Owen, Sr. is a Republican, a registered voter of the State of Georgia and resides in the Sixth Congressional District, Georgia Senate District 56 and Georgia House of Representatives District 41. Georgia Senate District 56 has a population deviation of 4.97% and Georgia House of Representatives District 41 is a single member district with a population deviation of 4.94%. Plaintiff Owen desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Owen is white.

25.

Plaintiff Linda Parker is a Republican, a registered voter of the State of Georgia and resides in the Seventh Congressional District, Georgia Senate District 21 and Georgia House of Representatives District 15. Georgia Senate District 21 has a population deviation of 4.98% and Georgia House of Representatives District 15 is a single member district with a population deviation of 3.89%. Plaintiff Parker desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting

strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Parker is white.

26.

Plaintiff Charles Payne, Jr. is a registered voter of the State of Georgia and resides in the Tenth Congressional District, Georgia Senate District 54 and Georgia House of Representatives District 04. Georgia Senate District 54 has a population deviation of 4.68% and Georgia House of Representatives District 04 is a single member district with a population deviation of 4.92%. Plaintiff Payne desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Payne is white.

27.

Plaintiff Roy Roberts is a registered voter of the State of Georgia and resides in the Ninth Congressional District, Georgia Senate District 45 and Georgia House of Representatives District 71. The Ninth Congressional District is overpopulated by 35 people; Georgia Senate District 45 has a population deviation of 4.97% and Georgia House of Representatives District 71 is a multimember district with a

population deviation of 1.82%. Plaintiff Roberts desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having his voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Roberts is white.

28.

Plaintiff Nancy Schaefer is a Republican, a registered voter of the State of Georgia and resides in the Ninth Congressional District, Georgia Senate District 51 and Georgia House of Representatives District 07. The Ninth Congressional District is overpopulated by 35 people; Georgia Senate District 51 has a population deviation of 4.99% and Georgia House of Representatives District 07 is a single member district with a population deviation of 4.15%. Plaintiff Schaefer desires to participate in the electoral and political processes of the State on the basis of equality with other citizens of the State without having her voting strength diluted or debased through use of the current redistricting plans for Georgia's Congressional, state Senate and House of Representatives Districts. Schaefer is white.

duty of signing into law redistricting plans for Georgia's Congressional and state legislative districts which comport with federal constitutional and statutory requirements.

38.

Defendant Terry Coleman is a resident of the State of Georgia and is sued in his representative capacity as the Speaker of the Georgia House of Representatives, one of the bodies of the Georgia General Assembly charged with redistricting Georgia's Congressional and state legislative districts in a manner consistent with federal constitutional and statutory requirements. The Georgia House of Representatives passed the current redistricting plans.

39.

Defendant Eric B. Johnson is a resident of Georgia and is sued in his representative capacity as the President Pro Tem of the Georgia Senate and the highest officer elected by that body. The state Senate is one of the bodies of the General Assembly charged with redistricting Georgia's state legislative and Congressional Representative Districts in a manner consistent with federal constitutional and statutory requirements. The Georgia Senate passed the current redistricting plans.

40.

Defendant Cathy Cox is a resident of Georgia, resides in this District and is Georgia's Secretary of State and Chair of the State Elections Board. She is sued in her representative capacity as the Constitutional officer of the State charged with the duty of conducting elections in Georgia in a manner consistent with federal constitutional and statutory requirements.

41.

While all of the above-named Defendants are sued in their official capacities and all Defendants act in their official capacities under color of state law, because the current redistricting plans violate federal constitutional and statutory mandates, Defendants' actions with respect to the conduct of elections under the current redistricting plans are outside the scope of their authority in those capacities.

### BACKGROUND FACTS

#### **The Congressional Plan**

42.

Prior to enactment of the current Congressional redistricting plan, the State of Georgia was divided into 11 Congressional Representative districts.

}

<u>District Number</u>	<u>Total Deviation (by person)</u>
01	34
02	8
03	21
04	-37
05	0
06	-2
07	-21
08	-27
09	35
10	-25
11	-29
12	8
13	5
Overall deviation	72

51.

Based on the above deviations, the voting strength of citizens in Georgia's purported Congressional Districts 1, 2, 3, 9, 12 and 13, including that of Plaintiffs Bohannon, Scott, Moring, Brush, Roberts, Schaefer, Benton, Williamson and Dodd, is severely diluted, as citizens in other purported districts have disproportionately greater voting strength.

52.

Furthermore, 2 U.S.C. § 2c provides that a state's Congressional representatives are to be elected from single member districts.

overpopulating the northern Georgia districts, i.e., the dilution of the votes of Plaintiffs and other citizens of those districts, was well-known to the Democratic leadership of the 2001-2002 General Assembly and to then-Governor Roy E. Barnes.

62.

During the General Assembly's special redistricting session in 2002, the third redistricting session of 2001-2002, the General Assembly passed and then-Governor Barnes signed into law the current Senate redistricting plan. The current redistricting plan for the state Senate is accurately represented by Exhibit "B" attached hereto.

63.

The ideal size of each of the fifty-six state Senate districts in Georgia is 146,187. The current redistricting plan for the state Senate has an overall range of population deviation of 9.98%. Of the 56 districts, 29 districts are centered in the northern part of the state, 11 districts are centered in the area of Fulton and DeKalb counties and 16 districts are centered in southern Georgia.

member districts have, through their representative, only one vote on any given matter, voters in multimember districts have two, three or even four votes on the same matter.

70.

Based on the above deviations and the imposition of multi-member districts, the voting strength of citizens in state House Districts 4, 26, 28, 35, 41, 67, 87, 101, 117 and 123, including that of the Plaintiffs listed in the immediately preceding paragraph, is severely diluted, as citizens in other districts have disproportionately greater voting strength. Furthermore, citizens living in single member districts, including the above-listed Plaintiffs, are afforded less representation than residents of multimember districts.

71.

Furthermore, the particular combination of multimember and single member districts in the House redistricting plan were used solely to preserve Democratic incumbents' seats in areas in which the 2000 census numbers warranted a reduction in the number of those seats.

72.

The technology and statistics available to the state of Georgia in the state legislative redistricting process allowed the drawing of districts with minimal population deviations, without the inclusion of discriminatory multimember districts.

73.

In fact, alternative state legislative redistricting plans were available to the General Assembly which proved that lower population deviations were not only possible but easily attained and were therefore practicable. In addition, these alternative plans distributed state legislative seats geographically according to population figures.

74.

However, the Democrat leadership in the 2001-2002 General Assembly and then-Governor Roy E. Barnes systematically and intentionally used their knowledge of past and anticipated future growth to identify fast-growing state legislative districts and slow or no growth districts, then overpopulated the fast-growth districts and underpopulated the slow-growth districts.

75.

The systematic and intentional overpopulating of the state legislative districts in northern Georgia and underpopulating of the districts in urban Fulton County, DeKalb County and southern Georgia, constitutes intentional and invidious discrimination against the voters of northern Georgia in that their votes are diluted vis-a-vis the voters in the underpopulated districts. Because of growth patterns, this dilution will be exacerbated throughout the decade, a fact known to the Democrat leadership of the 2001-2002 General Assembly and then-Governor Barnes.

76.

Although the basic principle of representative government is that the weight of a citizen's vote cannot be made to depend on where that citizen lives in a state, the intent and effect of the Georgia redistricting plans was and is to make the value of citizens' votes dependent on where they live. The Democratic-controlled General Assembly and then-Governor Barnes systematically and intentionally created state legislative districts with very substantial disparities in voting age population, citizens of voting age, registered voters and individuals actually casting votes, thereby giving differing voting power to voters in different parts of the state.

77.

The Democrat leadership of the 2001-2002 General Assembly and then-Governor Barnes systematically and intentionally underpopulated Senate districts designated as majority-minority districts and those with minority incumbent members. Individuals', including Plaintiffs', right to vote is unconstitutionally impaired when it is diluted in this manner in comparison with the votes of citizens living in majority-minority districts or those with minority incumbent members.

78.

In addition, the Democrat leadership of the 2001-2002 General Assembly and then-Governor Barnes systematically and intentionally overpopulated districts of Republican incumbents or districts which were identified as likely to elect a Republican and intentionally created multimember districts designed to maintain Democratic incumbents, decrease Republican incumbents and allow the same number or more Democratic seats to exist in areas which should have lost seats.

79.

By systematically packing voters perceived to be Republicans into overpopulated high growth districts and combining multimember districts with

82.

The current state legislative redistricting plans are so irrational on their face that the natural result will be to deprive citizens of the benefit of the principle of one person, one vote and their representational rights. There are no legitimate state policies, consistently applied, which can explain or justify the population deviations in the current state legislative redistricting plans.

83.

Unless state legislative districts of equal population are established, members of Georgia's General Assembly will be elected from malapportioned plans in violation of the federal constitutional and statutory law set forth above. Furthermore, unless multimember districts are abolished, citizens living in those districts will be afforded greater representation to the detriment of voters residing in single member districts, including some Plaintiffs.

84.

A genuine controversy exists between Plaintiffs and Defendants as to the matters asserted herein. Plaintiffs have no adequate remedy at law and no other way to guarantee their rights in connection with future elections other than through the relief sought in this lawsuit. Plaintiffs will suffer irreparable harm if elections are allowed to proceed under the current Congressional and state legislative

redistricting plans, and the injury will continue until those redistricting plans are declared to be unlawful, their use enjoined by this Court and districts which comport with the principle of one person, one vote are adopted.

COUNT ONE

**VIOLATION OF RIGHT TO EQUAL PROTECTION OF THE LAWS**

85.

Plaintiffs incorporate by reference the allegations contained in paragraphs 1-84 of this Complaint as if set forth herein.

86.

Article 4, Section 2 of the United States Constitution provides: "The citizens of each state shall be entitled to all privileges and immunities of citizens in the several states." Pursuant to this and other provisions of the United States Constitution, the right to vote is a fundamental right guaranteed to U.S. citizens.

87.

Section 1 of the Fourteenth Amendment to the United States Constitution provides: "No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the united States; nor shall any state deprive

any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.”

88.

Under the Fourteenth Amendment, it is unlawful for a state to create electoral districts for public office with an imbalance in population unless a legitimate governmental interest requires the same. Furthermore, the equal protection clause of the 14<sup>th</sup> Amendment to the United States Constitution requires racial neutrality in governmental decisionmaking, regardless of the races of those benefited or burdened by a particular racial classification.

89.

The current version of 42 U.S.C. § 1983 provides, in relevant part:

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory of the District of Columbia, subjects, or causes to be subjected any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress . . .

90.

Defendants are “person[s]” and Plaintiffs are all “citizen[s] of the United States” within the scope of 42 U.S.C. § 1983. The current redistricting plans were

enacted by the 2001-2002 General Assembly and then-Governor Barnes, all acting under color of state law. The continued use of the current redistricting plans by Defendants is action taken under color of state law.

91.

Plaintiffs intend and desire to participate in the electoral and political processes of the State of Georgia on the basis of equality with other citizens of the State.

92.

Plaintiffs' constitutional right to such equality in voting strength has been diluted and debased through the enactment and continued use of the current redistricting plans by which members of the Georgia General Assembly and Georgia's Congressional Representatives are to be elected. The dilution and debasement occurs through the overpopulation of districts, partisan gerrymandering, the particular use of multimember districts in the state House (which results in both overpopulation of single-member districts in which Plaintiffs reside and an illegal partisan gerrymandering) and, in the state Senate plan, the use of race as a predominant factor in the creation of the plan.

state subordinated all traditional neutral districting principles, specifically the principal redistricting criteria of population equality, to race, thereby intentionally and systematically creating majority-minority Senate districts with total populations significantly less than non majority-minority districts.

96.

There is no consistently applied legitimate state policy which can justify the population deviations in the current state legislative redistricting plans. Instead, the population deviations are designed to maximize the electoral effectiveness of Democrat political supporters and to minimize or dissipate the voting strength of Republican supporters. Furthermore, the use of racial classification in the Senate redistricting plan was not narrowly tailored to achieve any compelling state interest. Compliance with the Voting Rights Act does not require the creation of under populated majority-minority districts in comparison to either non majority-minority districts or ideal district population. Thus, the current state legislative redistricting plans intentionally and invidiously discriminate against the Republican Party, its members and other citizens who it may support as candidates, in violation of the United States Constitutional guarantees of the Fourteenth Amendment.

97.

The current Congressional and state legislative redistricting plans are gross partisan gerrymanders, which violate the United States Constitution's Fourteenth Amendment equal protection guarantee by fragmenting cohesive communities of interest and political subdivisions between purported districts in support of no legitimate or rational state interest. No legitimate public policy or governmental purpose is supported or furthered by these plans' needless division of these communities. This wanton fragmentation of cultural, ethnic, geographic economic and political communities results in a diminution of dilution of their voting rights, political power and influence. Leaving the current redistricting plans in place will cause a continued violate Plaintiffs' constitutional rights to equal protection.

98.

There is no adequate remedy at law for the irreparable harm Plaintiffs suffer and continue to suffer through continued use of the current Congressional and state legislative redistricting plans. The use of those plans, which unconstitutionally abridges the voting rights of Plaintiffs to elect and be represented by members of the United States House of Representatives and the General Assembly, should be declared unconstitutional and enjoined. In the event that the Georgia General Assembly is unable to pass constitutional redistricting plans in time for the 2004

elections, this Court should draw such plans for use until such time as the Georgia General Assembly enacts Congressional and state legislative redistricting plans that comport with constitutional and statutory law.

COUNT TWO

**VIOLATION OF FIRST AMENDMENT RIGHTS**

99.

Plaintiffs incorporate by reference the allegations contained in paragraphs 1-98 of this Complaint as if set forth herein.

100.

The First Amendment to the United States Constitution provides the right of freedom of speech and of association. The current state legislative redistricting plans impinge upon the freedom of association rights guaranteed by the First Amendment of the United States Constitution by packing Republican-leaning districts, thereby penalizing Republican voters and representatives solely because of their party affiliation and political beliefs. Public debates on issues of public importance are also chilled in violation of the First Amendment.

101.

There is no consistently applied legitimate state policy which can justify the population deviations in these Republican-leaning districts in the current state legislative redistricting plans.

102.

There is no adequate remedy at law for the irreparable harm Plaintiffs suffer and continue to suffer through continued use of the current state legislative redistricting plans. The use of those plans, which unconstitutionally abridges the voting rights of Plaintiffs to elect and be represented by members of the General Assembly on an equal basis with all other citizens, should be declared unconstitutional and enjoined. In the event that the Georgia General Assembly is unable to pass constitutional state legislative redistricting plans in time for the 2004 elections, this Court should draw such plans for use until such time as the Georgia General Assembly enacts plans that comport with constitutional and statutory law.

COUNT THREE

**VIOLATION OF ARTICLE I, § 2 OF THE UNITED STATES CONSTITUTION**

103.

Plaintiffs incorporate by reference the allegations contained in paragraphs 1-102 of this Complaint as if set forth herein.

104.

Article I, § 2 of the United States Constitution requires that congressional representative districts within a state have an equal number of people. The current Georgia Congressional redistricting plan violates this one person, one vote requirement.

105.

In addition, Article I of the United States Constitution vests the legislative power of the United States in two chambers: (1) the Senate, which was intended to represent the state; and, (2) the House of Representatives, which was intended to represent the people. Members of the House of Representatives are to be chosen by “the people of the several states.” U.S. Constitution, Article I, § 2.

106.

Under the Article I framework, the right to choose congressional representatives belongs not to the states, but to the people. Article I strictly

constrains the political party that controls a state legislature during a particular redistricting period from dictating the composition of the state's congressional delegations at the expense of the rights of the people to choose their members of the United States House of Representatives. Article I, § 4, the Election Clause, specifically limits the state of Georgia's authority in congressional elections to prescribing the times, places and manner of holding elections for senators and representatives.

107.

The current Georgia Congressional redistricting plan exceeds the state's authority to regulate the times, places and manner of congressional elections and violates Article I, § 2 of the United States Constitution because it dictates election outcomes. The outcomes of Georgia congressional elections are substantially preordained by a carefully crafted gerrymander, which gives Georgia voters little more power than to ratify the results engineered by the authors of the Georgia Congressional plan. The existing Congressional plan frustrates the majority's will by drawing districts that jettison all neutral districting criteria to maximize Democratic advantage in congressional elections.

108.

There is no adequate remedy at law for the irreparable harm Plaintiffs will suffer through continued use of the purported Georgia Congressional redistricting plan. The use of that plan, which unconstitutionally abridges the voting rights of Plaintiffs to elect and be represented by members of the United States House of Representatives should be declared unconstitutional under Article I, § 2 of the United States Constitution and enjoined. In the event that the Georgia General Assembly is unable to pass constitutional Congressional redistricting plans in time for the 2004 elections, this Court should draw such plans for use until such time as the Georgia General Assembly enacts a Congressional plan that comports with constitutional law.

COUNT FOUR

**VIOLATION OF 2 U.S.C. § 2c**

109.

Plaintiffs incorporate by reference the allegations contained in paragraphs 1-108 of this Complaint as if set forth herein.

110.

2 U.S.C. § 2c requires that any state entitled to more than one Representative in the United States Congress establish single member districts for the election of

such Representatives. The Georgia Congressional Representative Plan violates 2 U.S.C. § 2c because Georgia has failed to create such congressional districts. Although the Georgia Congressional Plan purportedly contains congressional Representative districts, these districts are amalgamations of census geography or blocs bearing no identifiable relationship to any geographic entity. These purported districts are neither compact nor contiguous. They were created solely for partisan political purposes, and fail to have the minimum rational geographic or representational basis to constitute a single member district as contemplated. They are not Congressional Representative districts as contemplated and required by federal statute.

111.

There is no adequate remedy at law for the irreparable harm Plaintiffs will suffer through continued use of the purported Georgia Congressional redistricting plan. Until Georgia is redistricted in the manner provided by Federal law, the Representatives from Georgia must be elected in the manner provided for in 2 U.S.C. § 2a (c). Accordingly, Plaintiffs are entitled to injunctive and declaratory relief declaring Georgia's current Congressional redistricting plan unconstitutional, and enjoining all future election of Georgia's Congressional delegation until those

districts are created in a manner that does not violate the United States Constitution and federal statutes.

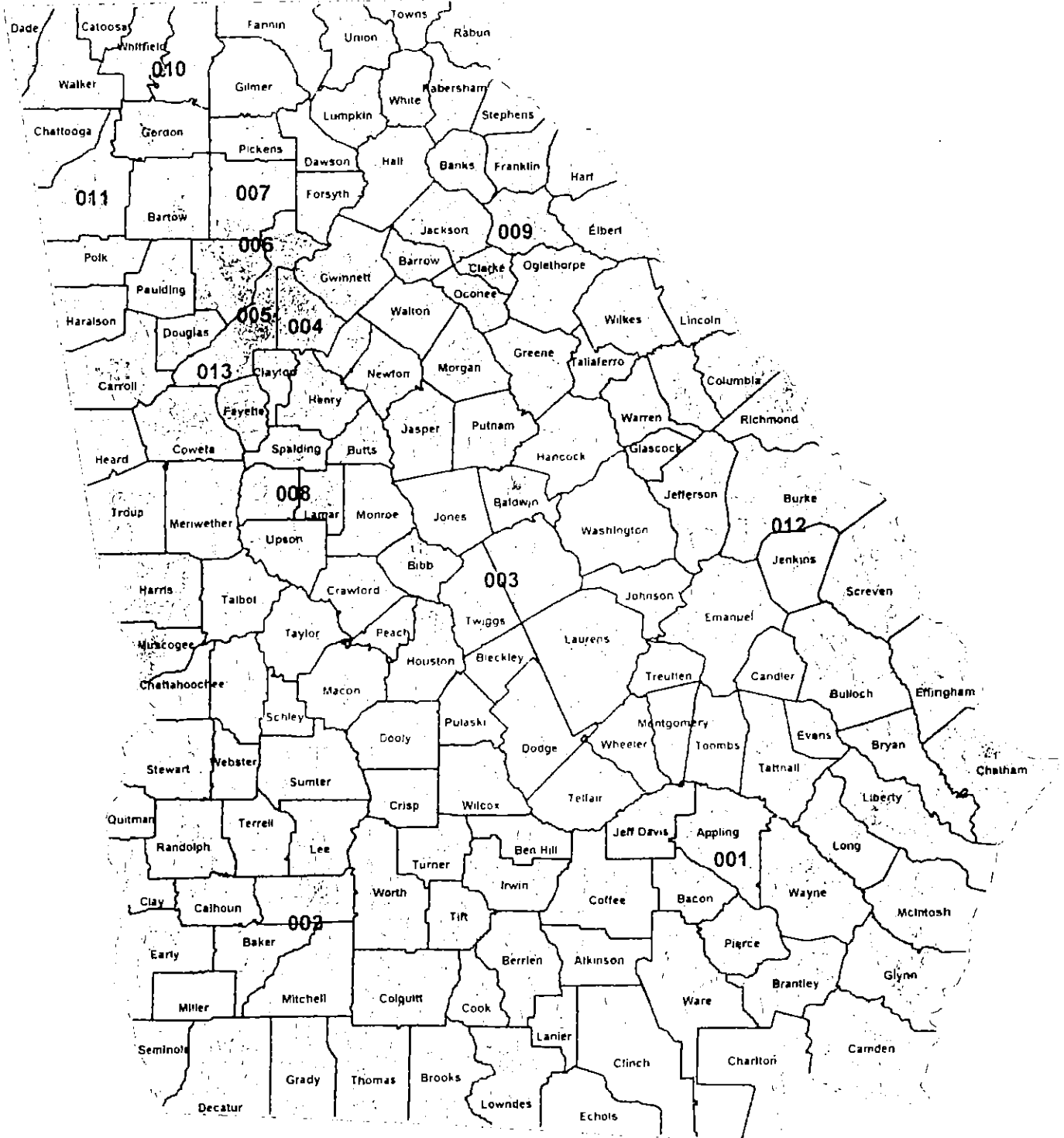
WHEREFORE, Plaintiff respectfully prays that this Court grant the following relief:

- A) Assume jurisdiction of this case;
- B) Make application to the Chief Judge of the Circuit to appoint a three-judge court to hear and decide this case in accordance with 28 U.S.C. § 2284, as this action involves statewide redistricting plans;
- C) Enter a declaratory judgment that the present apportionment of the current Congressional, Georgia Senate and Georgia House of Representatives districts violates the Fourteenth Amendment to the United States Constitution and 42 U.S.C. § 1983 in that the districts violate the equal protection clause;
- D) Enter a declaratory judgment that the continued use of the current redistricting plans for Georgia's state legislative and Congressional districts violates the Article IV, §2 of the United States Constitution, the First and the Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983;

- E) Enter a declaratory judgment that the continued use of the current Congressional redistricting plan violates Article I, §§ 2 and 4 of the United States Constitution, the First and Fourteenth Amendments of the United States Constitution, 2 U.S.C. 2a, 2b, 2c and 42 U.S.C. § 1983.
- F) After entering the declaratory judgments as described above, enjoin all future elections of members of Georgia's General Assembly and Georgia's Congressional representatives until those plans are districted in a manner that does not violate federal statutes, the United States Constitution or the Georgia Constitution;
- G) In the event that new redistricting plans are not enacted and precleared under Section 5 of the Voting Rights Act of 1965, 42 U.S.C. § 1973c in time for such plans to be used in the 2004 elections, enter an order that creates Georgia's state legislative and Congressional districts in a manner consistent with the United States Constitution and federal statutes;
- H) Award Plaintiffs their costs and attorney's fees of this action, pursuant to 42 U.S.C. § 1988 or as otherwise authorized by law; and

# State of Georgia Congressional Districts

Client: Congress  
Plan: Cong02  
Type: Congress



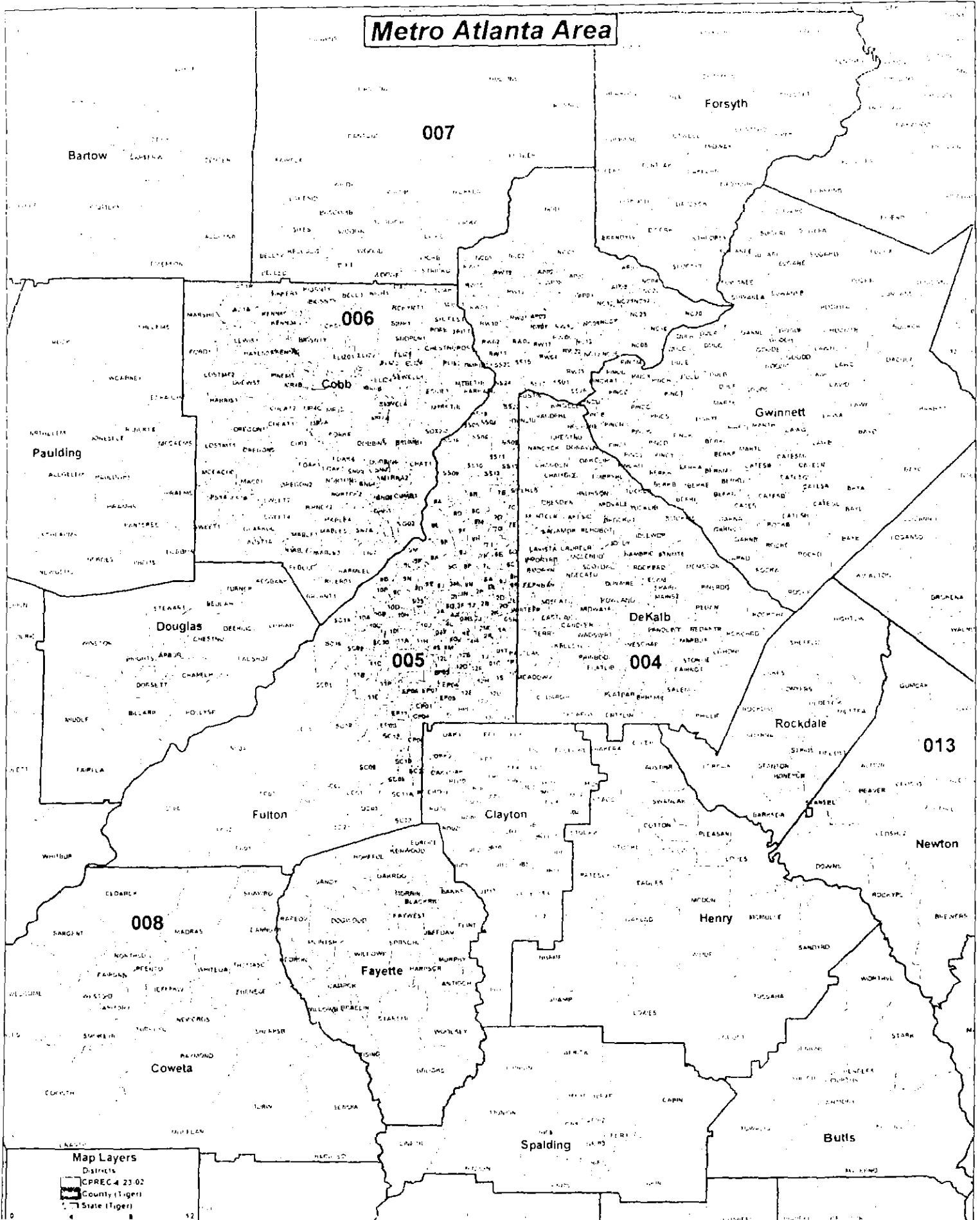
### Map Layers

- Districts
- CPREC 4 23-02
- County (Tiger)
- State (Tiger)

0 20 40 60

# State of Georgia Congressional Districts

Client: Congress  
Plan: Cong02  
Type: Congress



**Metro Atlanta Area**

Bartow

007

Forsyth

006

Cobb

Gwinnett

Paulding

Douglas

005

DeKalb

004

Rockdale

013

Fulton

Clayton

Newton

008

Fayette

Henry

Coweta

Spalding

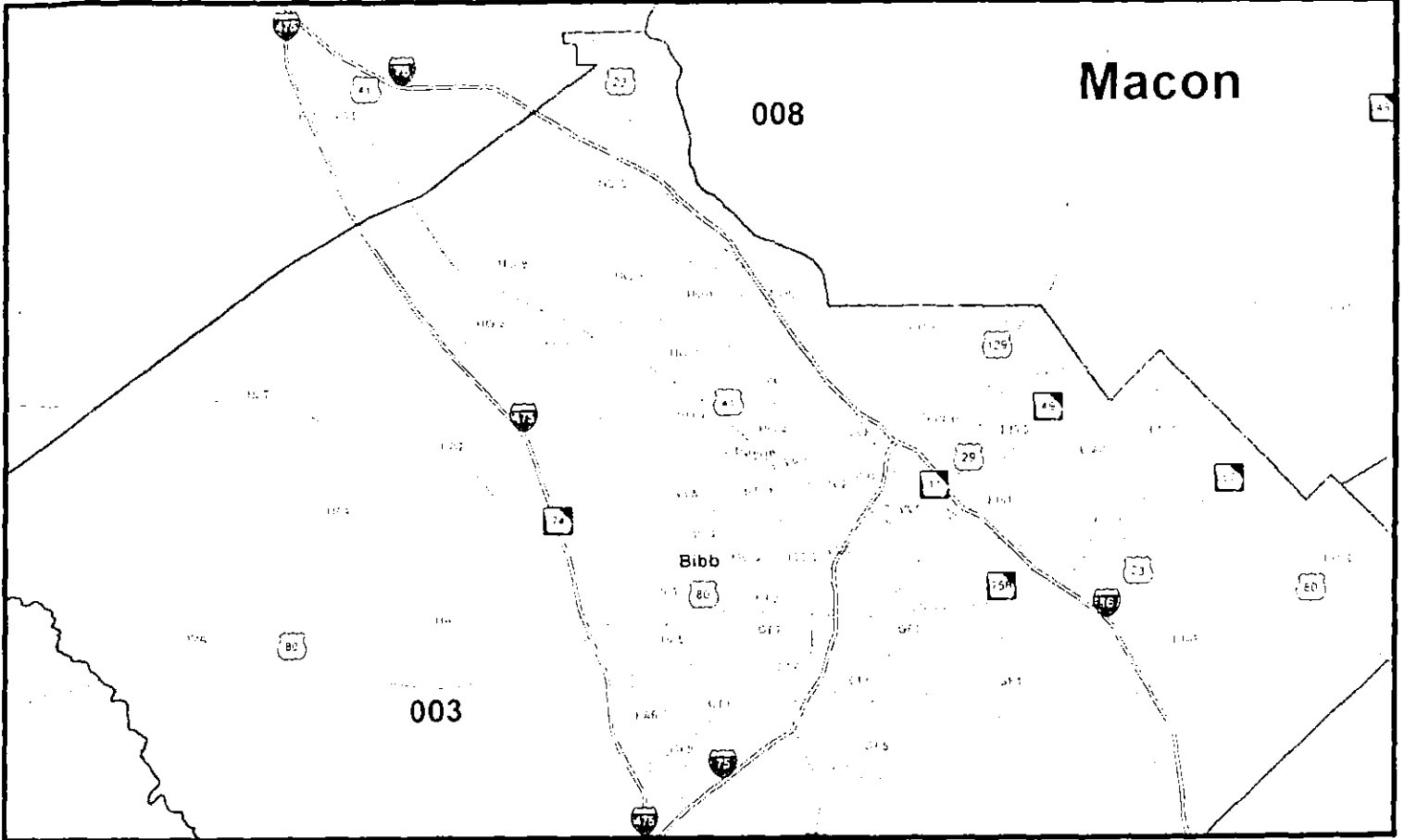
Butts

Map Layers

- Districts
- CPREC 4 23 02
- County (Tiger)
- State (Tiger)

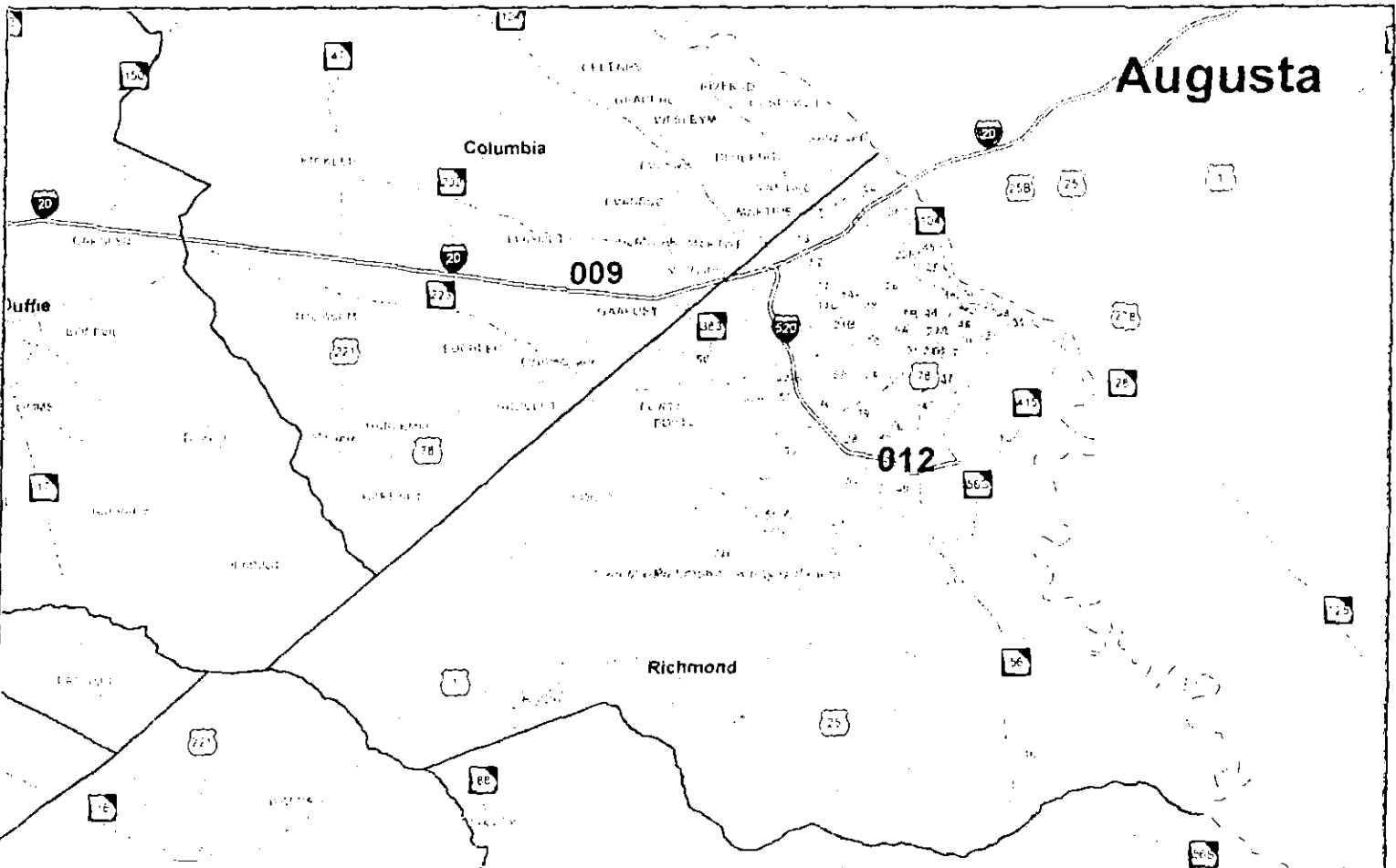
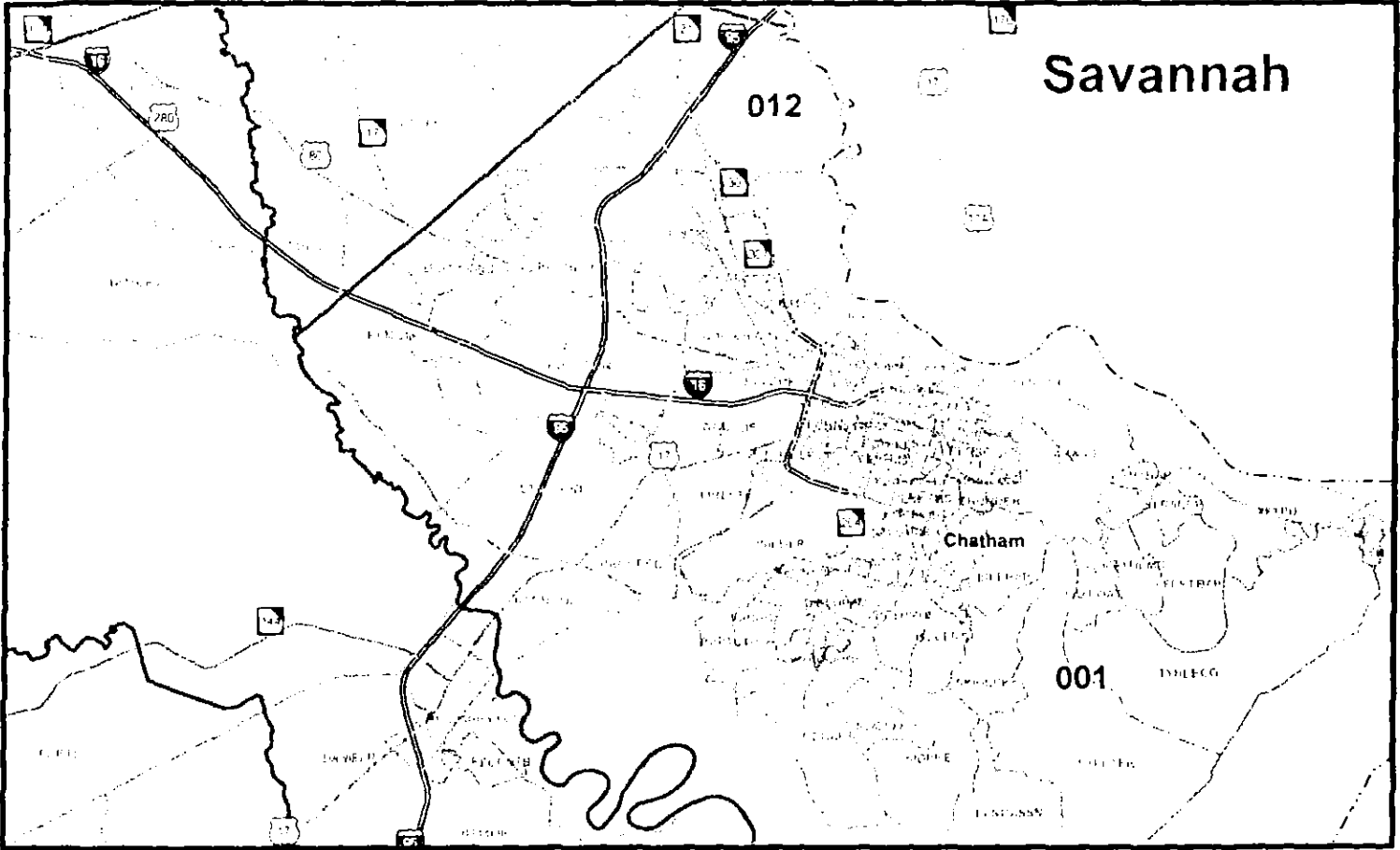
# State of Georgia Congressional Districts

Client: State  
Plan: Cong02  
Type: Congress



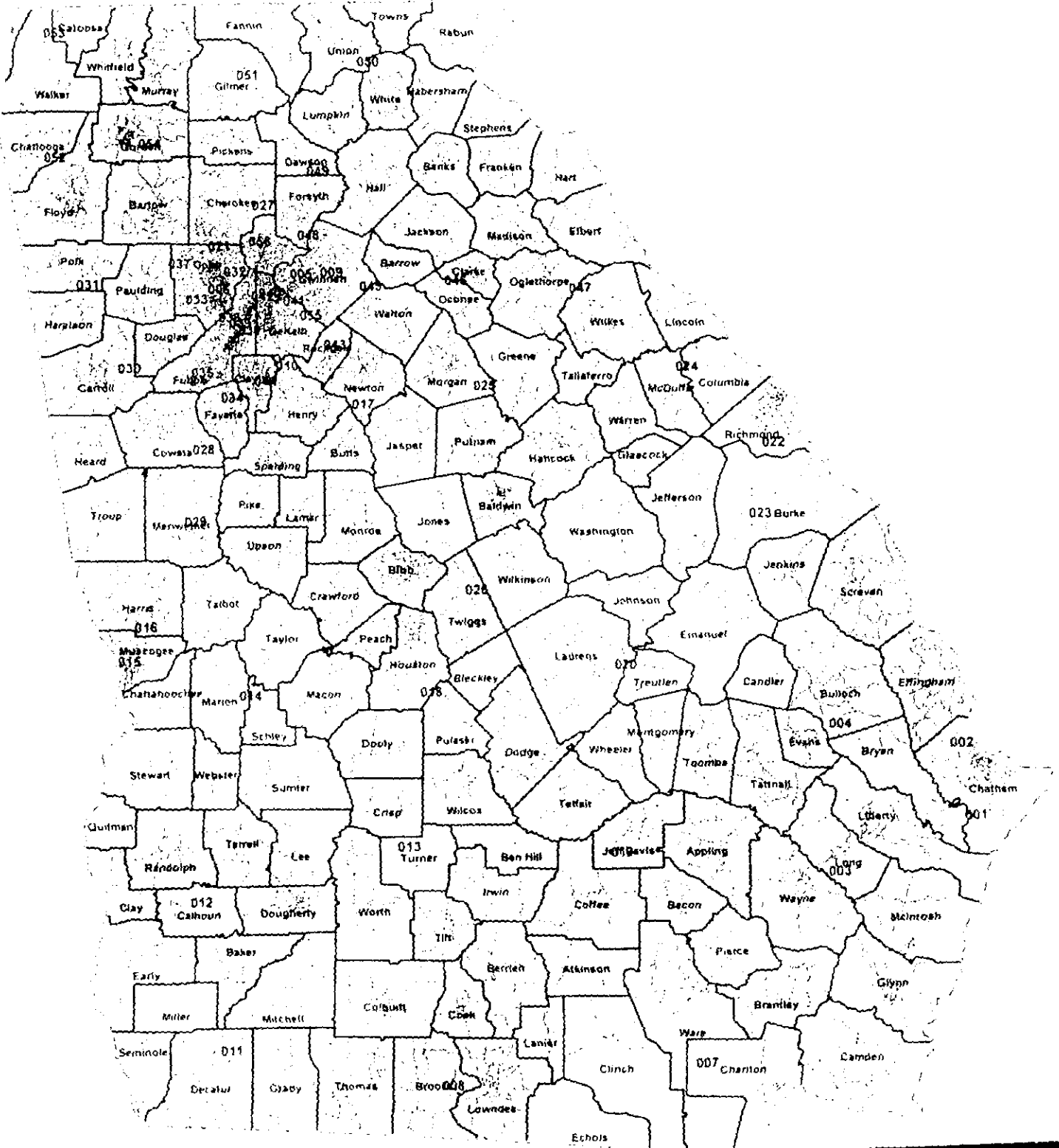
# State of Georgia Congressional Districts

Client: State  
Plan: Cong02  
Type: Congress



# State of Georgia Senate Districts

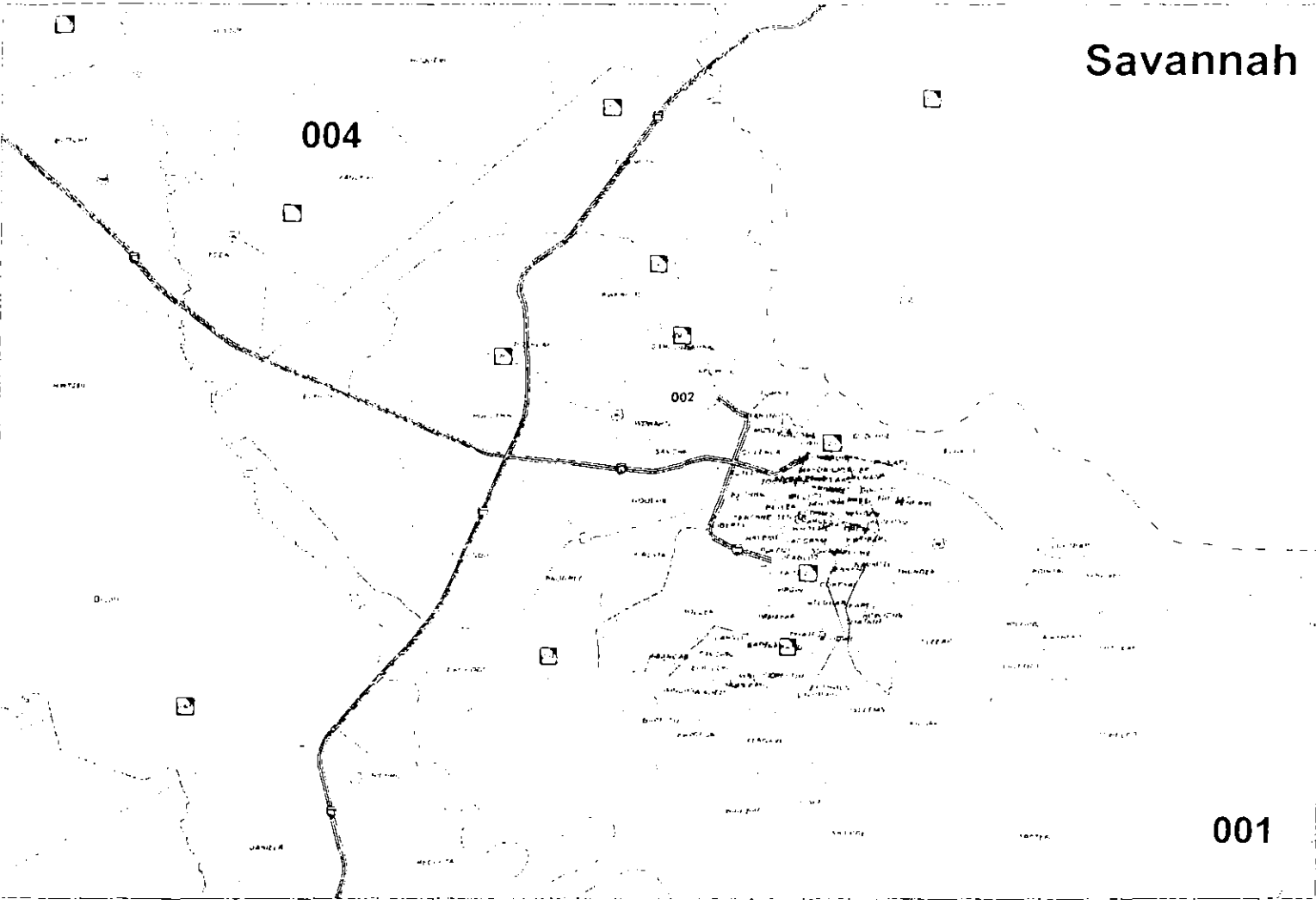
Chart: State  
Plan: Senate02  
Type: Senate



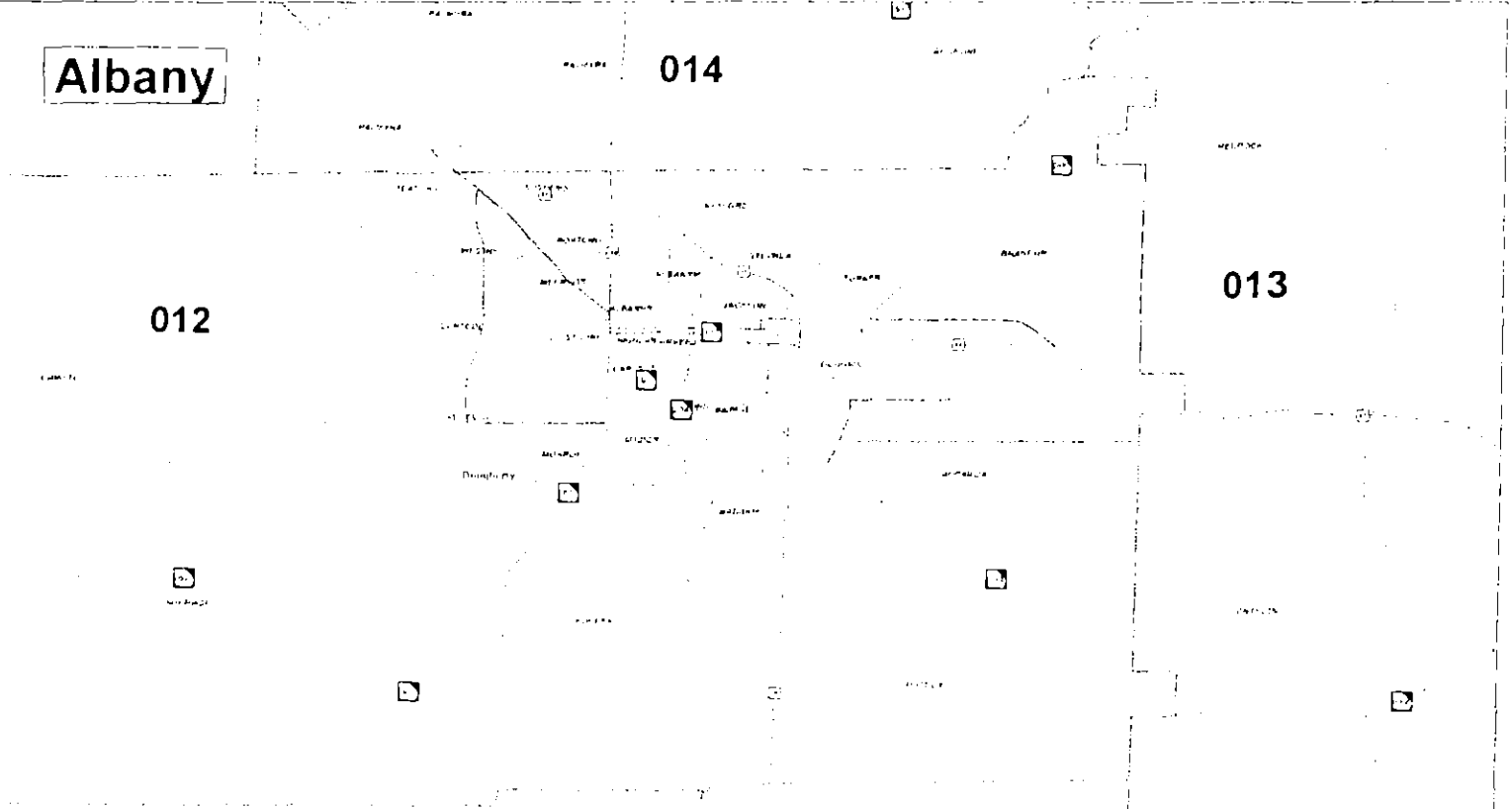
# State of Georgia Senate Districts

Client: State  
Plan: Senate02  
Type: Senate

## Savannah

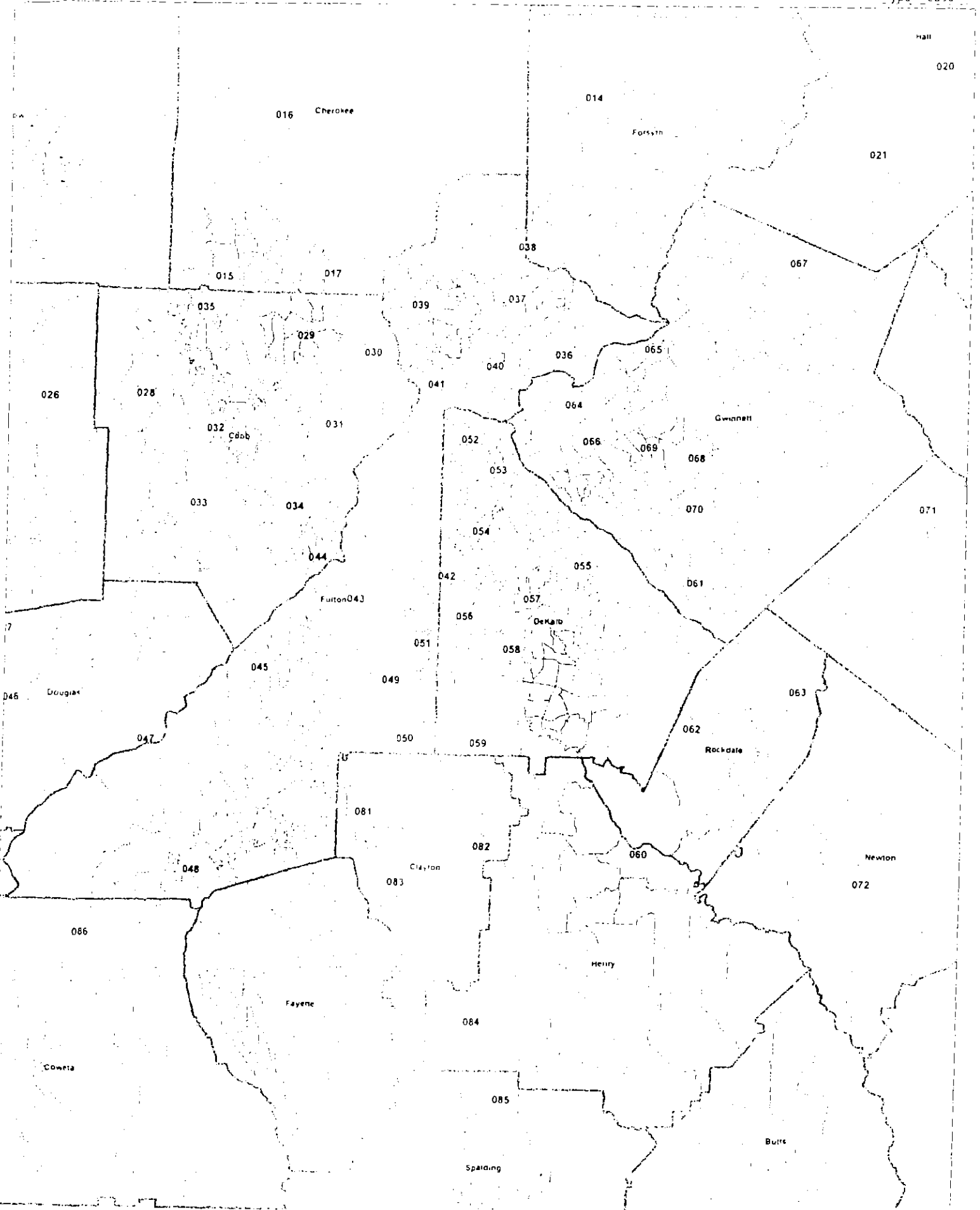


## Albany



# State of Georgia House Districts

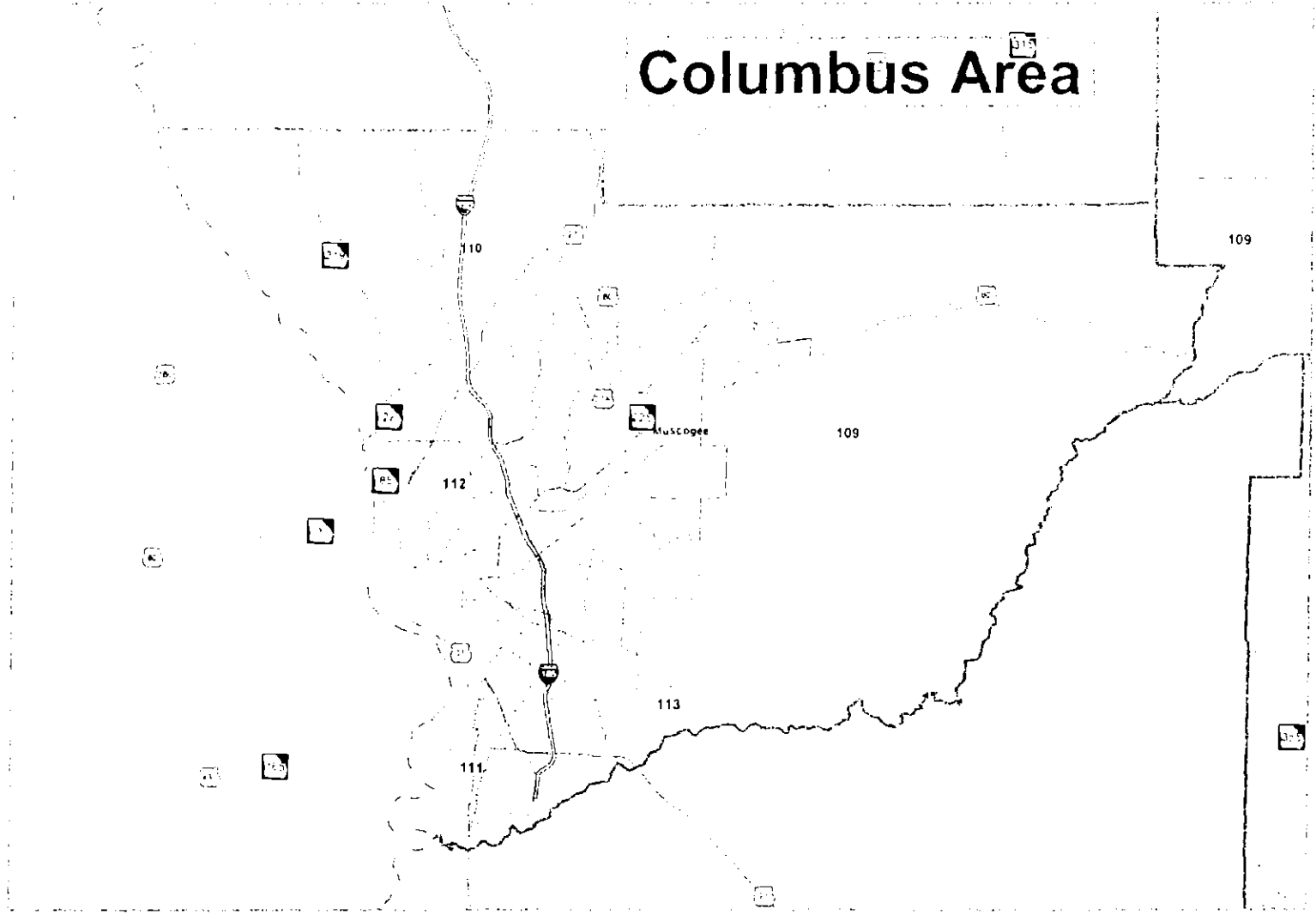
Client State  
Plan House02  
Type House



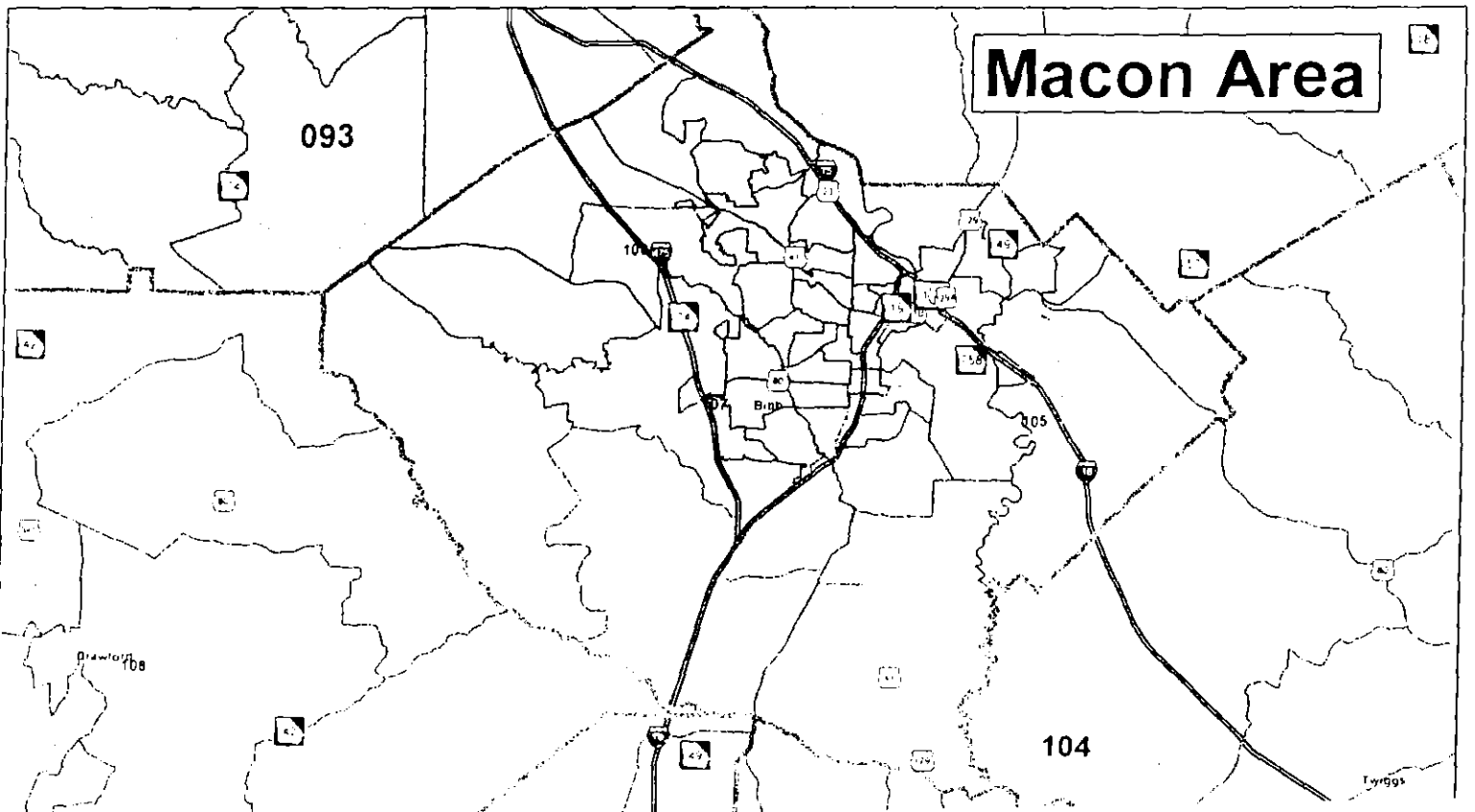
# State of Georgia House Districts

Client State  
Plan House02  
Type House

## Columbus Area



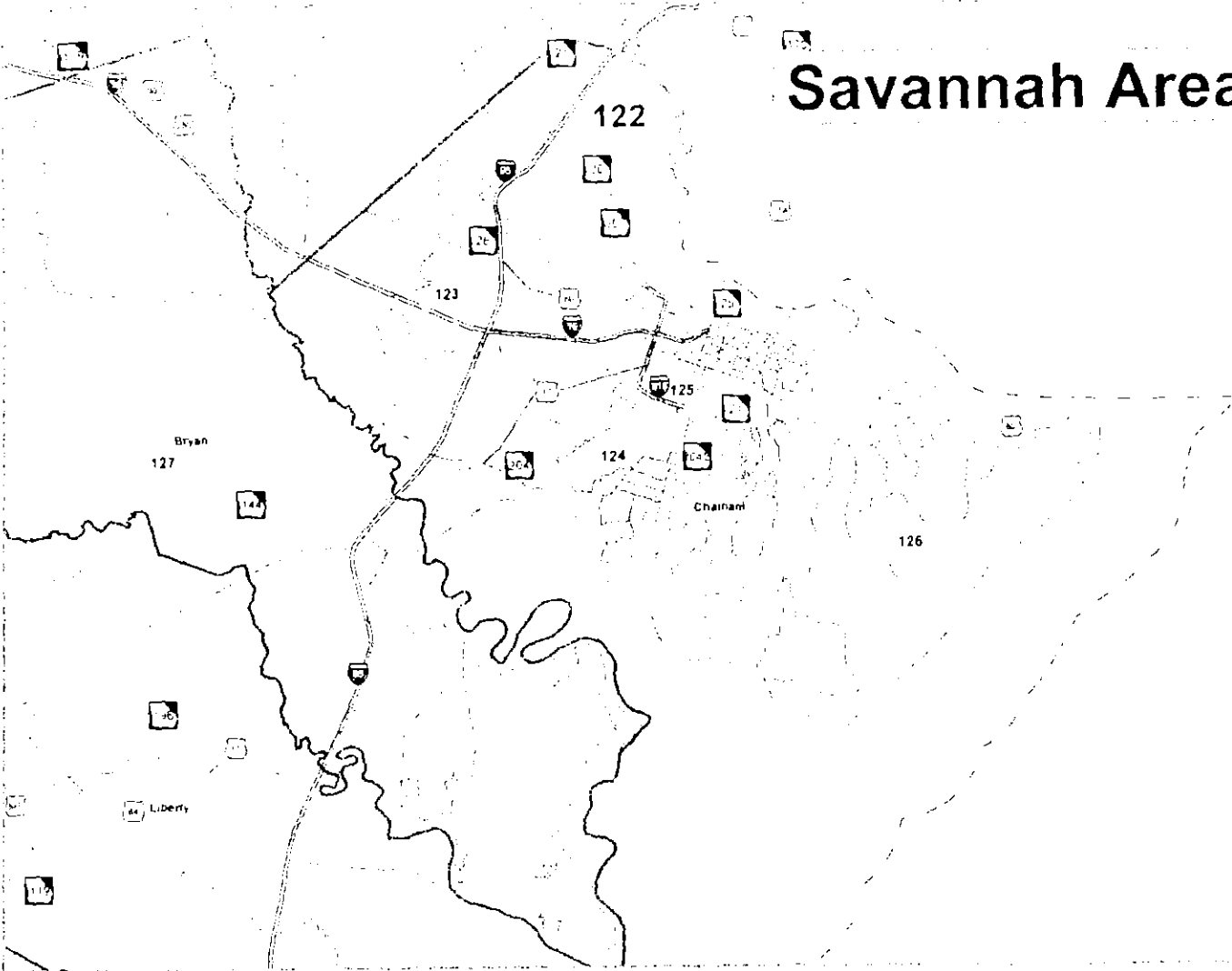
## Macon Area



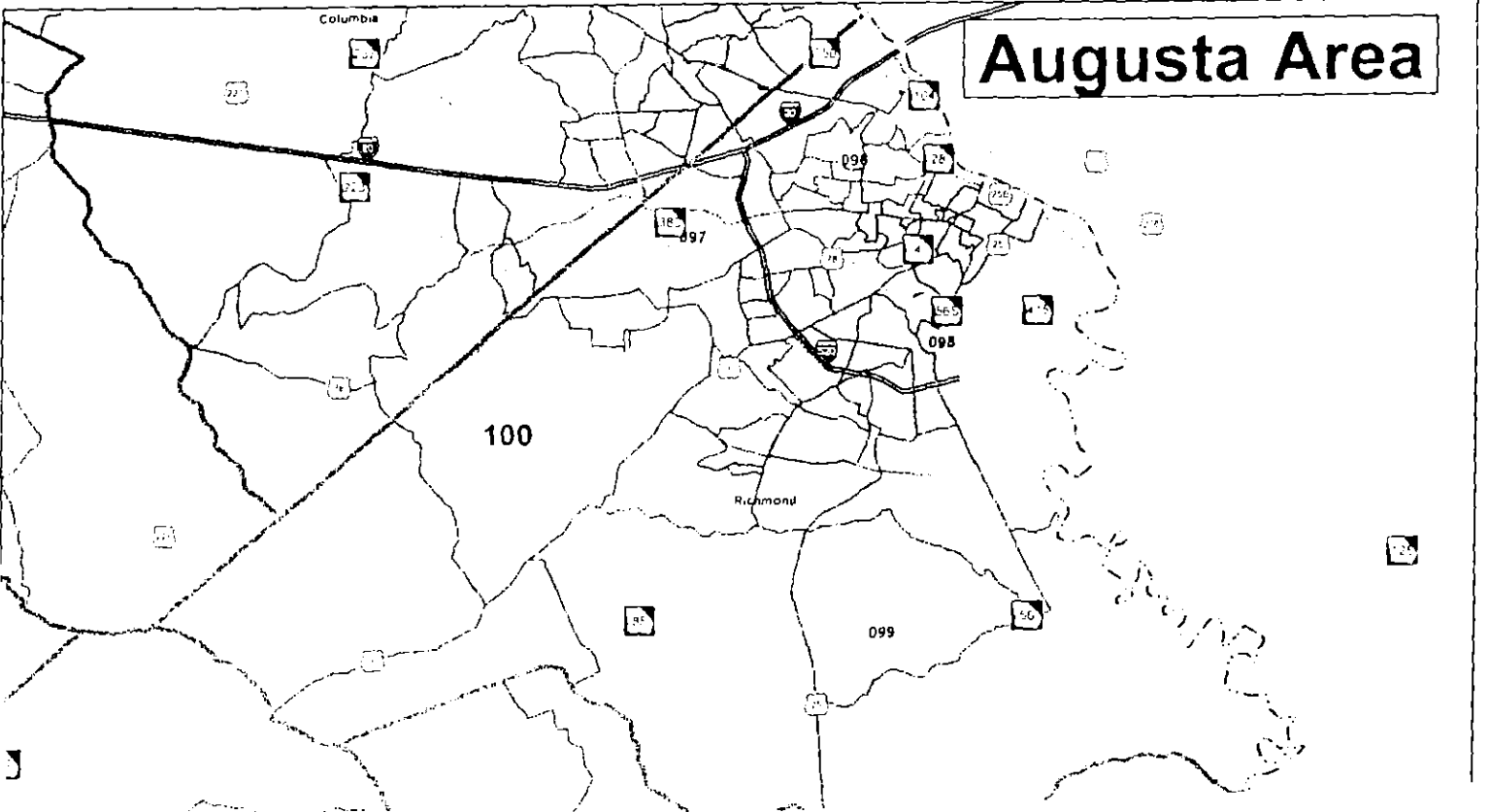
# State of Georgia House Districts

Client State  
Plan House02  
Type House

## Savannah Area



## Augusta Area



DISTRICT	POPULATION	DEVIATION	DEVIATION	%	BLACK	BLACK	%	BLACK	COMBO	BLACK	TOTAL	%TOTAL	BLACK	LATINO	%HISP.
001	43,994	-1,456	-3.27%	1,969	4.48%	1,422	4.28%	14	114	2,683	4.73%	1,440	4.34%	389	0.88%
002	46,960	1,480	3.25%	534	1.14%	381	1.07%	61	13	595	1.27%	394	1.11%	478	1.02%
003	95,270	4,310	4.74%	1,119	1.17%	756	1.02%	29	146	1,265	1.33%	785	1.11%	2,875	3.02%
004	47,717	2,237	4.92%	1,473	3.09%	1,009	2.88%	162	162	1,635	3.43%	1,058	3.02%	6,525	18.61%
005	46,350	850	1.87%	1,485	3.21%	1,069	3.23%	47	149	1,634	3.53%	1,116	3.37%	8,875	19.16%
006	47,209	1,729	3.80%	355	0.75%	249	0.69%	39	39	394	0.83%	262	0.72%	810	2.24%
007	47,366	1,886	4.15%	1,058	2.23%	804	2.23%	108	108	1,166	2.46%	848	2.35%	2,807	5.93%
008	45,685	205	0.45%	353	0.77%	265	0.72%	46	46	399	0.87%	251	0.72%	951	2.08%
009	47,698	2,218	4.88%	1,914	4.01%	2,017	4.23%	103	103	2,177	4.23%	1,484	4.18%	3,858	8.09%
010	44,104	-1,376	-3.03%	1,527	3.46%	1,077	3.36%	27	196	1,635	3.70%	1,104	3.39%	3,268	7.41%
011	45,402	-78	-0.17%	3,602	7.97%	2,831	8.18%	30	138	3,740	8.24%	2,861	8.27%	1,148	2.53%
012	47,360	1,880	4.13%	2,680	5.66%	1,856	5.43%	125	125	2,865	5.92%	1,882	5.51%	1,070	2.26%
013	94,588	3,628	3.99%	14,505	15.65%	10,990	14.26%	85	350	15,155	16.02%	10,175	14.39%	5,772	6.10%
014	95,034	4,074	4.48%	527	0.55%	369	0.53%	77	35	604	0.64%	404	0.58%	4,384	4.61%
015	47,248	1,768	3.89%	1,422	3.01%	919	2.80%	137	137	1,559	3.30%	964	2.94%	2,732	5.78%
016	47,654	2,174	4.78%	1,105	2.32%	757	2.18%	93	93	1,198	2.51%	787	2.27%	3,213	6.74%
017	47,674	2,194	4.82%	1,561	3.27%	1,071	3.17%	123	123	1,684	3.53%	1,121	3.32%	1,859	3.90%
018	43,482	-1,988	-4.39%	2,196	5.05%	1,523	4.29%	161	161	2,297	5.28%	1,555	4.89%	382	0.88%
019	43,307	-2,173	-4.78%	5,396	12.46%	3,700	11.62%	134	134	5,530	12.77%	3,736	11.73%	2,980	6.81%
019	31,849							36	36	3,736	11.73%			1,888	5.93%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP.
020	47,642	2,162	4.55%	6,886	160	7,046	14.79%	17,414	36.55%
VAP	34,893			4,804	78	4,882	13.99%	11,220	32.16%
021	47,412	1,932	4.25%	1,946	110	2,056	4.34%	6,094	12.85%
VAP	35,105			1,352	36	1,388	3.95%	3,850	10.97%
022	43,324	-2,156	-4.74%	3,743	115	3,858	8.90%	787	1.82%
VAP	32,785			2,619	30	2,649	8.08%	504	1.54%
023	44,230	-1,250	-2.75%	6,094	106	6,200	14.02%	417	0.94%
VAP	33,632			4,261	26	4,307	12.81%	281	0.84%
024	44,498	-982	-2.16%	2,159	120	2,279	5.12%	1,498	3.37%
VAP	31,917			1,475	33	1,508	4.72%	987	3.09%
025	43,235	-2,245	-4.94%	5,558	194	5,752	13.30%	1,211	2.80%
VAP	31,620			3,989	41	4,030	12.75%	767	2.43%
026	47,741	2,261	4.97%	3,288	129	3,417	7.16%	1,002	2.10%
VAP	33,180			2,128	40	2,168	6.53%	630	1.90%
027	46,907	1,427	3.14%	7,840	335	8,175	17.43%	1,215	2.59%
VAP	32,621			5,016	82	5,098	15.63%	717	2.20%
028	47,745	2,265	4.98%	2,431	107	2,538	5.32%	1,015	2.13%
VAP	31,985			1,558	41	1,599	5.00%	621	1.94%
029	47,615	2,135	4.69%	3,407	235	3,642	7.65%	2,018	4.24%
VAP	34,125			2,248	103	2,351	6.89%	1,320	3.87%
030	47,858	2,078	4.57%	1,618	119	1,737	3.65%	1,069	2.25%
VAP	33,756			1,138	51	1,189	3.52%	702	2.08%
031	47,458	1,978	4.35%	2,938	172	3,110	6.55%	1,493	3.15%
VAP	36,173			2,074	80	2,154	5.95%	1,081	2.99%
032	47,646	2,166	4.76%	5,201	198	5,399	11.33%	3,077	6.46%
VAP	35,872			3,622	109	3,731	10.40%	2,232	6.22%
033	136,143	-297	-0.22%	43,369	1,279	44,648	32.70%	17,679	12.99%
VAP	100,365			28,508	550	29,058	28.95%	11,979	11.94%
034	130,408	-6,032	-4.42%	42,713	1,400	44,113	33.83%	16,814	12.89%
VAP	102,768			30,009	784	30,793	29.96%	11,919	11.60%
035	47,747	2,267	4.98%	5,471	298	5,769	12.08%	2,368	4.95%
VAP	33,664			3,610	125	3,735	11.09%	1,544	4.59%
036	46,854	1,374	3.02%	2,831	218	3,049	6.51%	1,562	3.33%
VAP	31,285			1,865	92	1,957	6.26%	1,029	3.29%
037	47,471	1,991	4.38%	3,557	231	3,788	7.98%	5,017	10.57%
VAP	34,343			2,548	120	2,668	7.77%	3,772	10.95%
038	47,447	1,967	4.32%	886	55	941	1.98%	1,985	4.18%
VAP	32,977			626	26	652	1.98%	1,356	4.11%
039	47,549	2,069	4.55%	2,608	164	2,772	5.83%	2,695	5.67%
VAP	35,495			1,816	80	1,896	5.34%	1,951	5.50%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	% BLACK	BLACK COMBO	TOTAL BLACK	% TOTAL BLACK	HISP. OR LATINO	% HISP.
040	47,378	1,598	4.17%	4,231	278	4,509	9.52%	4,183	8.83%
VAP	35,439			2,952	154	3,106	8.76%	3,114	8.79%
041	47,326	2,246	4.94%	7,075	346	7,421	15.58%	2,962	6.21%
VAP	38,556			5,418	225	5,643	14.52%	2,214	5.76%
042	175,212	-6,708	-3.69%	20,058	898	20,956	11.96%	17,634	10.66%
VAP	153,771			17,101	680	17,781	11.56%	14,041	9.13%
043	95,322	4,362	4.80%	63,574	634	64,208	67.36%	2,465	2.59%
VAP	72,978			47,135	435	47,570	65.18%	1,822	2.50%
044	45,173	-307	-0.68%	28,953	233	29,186	64.61%	1,990	4.41%
VAP	33,002			19,375	155	19,530	59.18%	1,507	4.57%
045	46,102	622	1.37%	29,793	287	30,080	65.25%	903	1.96%
VAP	34,199			21,909	166	22,075	64.55%	579	1.69%
046	47,407	1,927	4.24%	6,410	218	6,628	13.98%	1,111	2.34%
VAP	34,123			4,074	80	4,154	12.17%	724	2.12%
047	46,491	1,011	2.32%	27,936	322	28,258	60.78%	975	2.10%
VAP	33,511			19,954	192	20,146	60.12%	641	1.91%
048	176,939	-4,981	-2.74%	111,511	1,492	113,003	64.04%	8,095	4.58%
VAP	126,761			76,659	833	77,492	61.13%	5,293	4.18%
049	43,209	-2,271	-4.99%	35,649	406	36,055	83.44%	2,136	4.94%
VAP	31,599			25,306	251	25,557	80.88%	1,643	5.20%
050	43,211	-2,269	-4.99%	30,085	346	30,431	70.42%	4,354	10.08%
VAP	28,469			18,450	164	18,614	65.38%	3,015	10.59%
051	43,675	-1,805	-3.97%	24,806	356	25,162	57.61%	3,196	7.32%
VAP	34,793			17,862	256	18,118	52.07%	2,428	6.98%
052	46,391	911	2.00%	3,776	191	3,967	8.55%	1,571	3.39%
VAP	37,698			2,592	144	2,736	7.07%	1,230	3.27%
053	45,658	178	0.39%	9,682	419	10,101	22.12%	12,014	26.31%
VAP	36,985			7,210	243	7,453	20.15%	8,982	24.29%
054	45,406	174	0.16%	7,221	481	7,702	16.96%	18,737	41.27%
VAP	36,076			5,590	339	5,929	16.43%	14,244	39.48%
055	43,458	-2,022	-4.45%	25,458	634	26,092	60.01%	2,259	5.20%
VAP	31,590			19,341	340	19,681	62.30%	1,586	5.02%
056	86,447	-4,513	-4.96%	11,729	494	12,223	14.14%	4,434	5.13%
VAP	71,669			8,458	259	8,717	12.16%	3,381	4.72%
057	43,253	-2,227	-4.90%	25,992	1,518	27,510	63.60%	1,704	3.94%
VAP	31,029			17,589	900	18,489	59.59%	1,181	3.81%
058	43,458	-2,022	-4.45%	35,179	406	35,585	81.88%	1,023	2.35%
VAP	31,254			24,355	235	24,590	78.65%	699	2.24%
059	130,785	-5,655	-4.14%	82,123	927	83,050	63.50%	2,984	2.28%
VAP	93,169			57,141	492	57,633	61.86%	2,024	2.17%

DISTRICT	POPULATION	DEVIATION	%	BLACK	BLACK	%	COMBO	BLACK	TOTAL	TOTAL	%TOTAL	HISPOR	LATINO	%HISP.
000	130,855	-6,355	-4.06%	78,534	60,376%	1.033	79,567	61.17%	2,398	1.84%	1,599	1.74%	2,398	1.84%
001	155,426	-1,014	-0.74%	81,597	60.25%	1,557	83,154	61.40%	4,159	3.09%	2,761	2.94%	4,159	3.09%
002	47,594	2,114	4.65%	26,174	54.99%	453	26,627	55.95%	3,694	7.76%	2,026	4.27%	3,694	7.76%
003	46,032	552	1.21%	6,475	14.07%	180	6,655	14.46%	1,084	2.35%	747	1.62%	1,084	2.35%
004	46,804	1,324	2.91%	4,837	10.33%	269	5,106	10.91%	4,090	8.74%	2,901	6.22%	4,090	8.74%
005	45,135	-345	-0.76%	3,464	7.67%	181	3,645	8.08%	1,985	4.40%	1,343	2.97%	1,985	4.40%
006	45,846	366	0.80%	11,655	25.42%	484	12,139	26.48%	13,843	30.19%	10,059	22.05%	13,843	30.19%
007	95,464	4,504	4.95%	6,607	6.92%	302	6,909	7.24%	5,882	6.16%	3,848	4.03%	5,882	6.16%
008	43,338	-2,142	-4.91%	7,028	16.22%	344	7,372	17.01%	5,448	12.57%	3,567	8.12%	5,448	12.57%
009	88,495	-2,465	-2.71%	22,611	25.55%	947	23,558	26.62%	21,511	24.31%	14,954	16.91%	21,511	24.31%
010	140,596	4,156	3.05%	12,018	8.55%	601	12,619	8.98%	7,379	5.25%	4,844	3.43%	7,379	5.25%
011	92,618	1,658	1.82%	4,224	5.19%	235	4,959	5.35%	3,157	3.41%	2,047	2.21%	3,157	3.41%
012	43,406	-2,074	-4.56%	16,131	37.16%	184	16,315	37.59%	858	1.98%	581	1.36%	858	1.98%
013	45,550	70	0.15%	5,377	11.80%	146	5,523	12.13%	767	1.68%	453	1.37%	767	1.68%
014	47,617	2,137	4.70%	7,206	16.15%	180	7,886	16.56%	1,633	3.43%	1,208	2.95%	1,633	3.43%
015	44,796	-684	-1.50%	15,047	41.63%	295	18,942	42.29%	4,500	10.05%	3,111	8.78%	4,500	10.05%
016	44,818	-662	-1.46%	4,291	9.57%	91	4,382	9.78%	1,394	3.11%	895	2.70%	1,394	3.11%
017	47,673	2,193	4.82%	16,943	35.54%	188	17,131	35.93%	1,044	2.19%	690	1.93%	1,044	2.19%
018	47,204	1,724	3.79%	14,498	30.71%	101	14,599	30.92%	888	1.88%	654	1.85%	888	1.88%
019	44,772	-708	-1.56%	6,300	14.07%	215	6,515	14.55%	1,344	3.00%	868	2.76%	1,344	3.00%

DISTRICT	POPULATION	DEVIATION	DEVIATION	DEVIATION	BLACK	BLACK	BLACK	COMBO	BLACK	TOTAL	TOTAL	HSROR	HSROR	
		%	%	%	%	%	%	%	%	%	%	%	%	
080	44,516	-0.64	-2.12%	3,711	8.34%	149	3.60	2,517	5.81%	3,660	8.21%	969	2.14%	
081	44,302	-1.118	-2.46%	33,912	76.44%	627	34,539	77.86%	23,526	53.11%	1,436	4.81%	2,134	4.81%
082	43,458	-2.022	-4.45%	18,382	42.30%	441	18,823	43.31%	11,855	27.28%	1,412	4.59%	2,219	5.11%
083	44,520	-0.60	-2.11%	26,417	59.40%	549	26,966	60.64%	16,517	37.09%	1,795	6.05%	2,845	6.40%
084	93,506	2.546	2.80%	34,034	36.40%	552	34,886	37.31%	22,014	23.54%	5,597	8.41%	8,131	8.70%
085	94,869	3.909	4.30%	61,82	65.2%	159	63,71	67.2%	4,228	6.25%	1,575	1.98%	1,234	1.82%
086	42,681	2.201	4.84%	3,712	7.9%	146	3,858	8.09%	2,480	7.46%	1,247	2.62%	1,247	2.62%
087	47,120	2,240	4.93%	5,947	12.46%	133	6,080	12.94%	3,977	11.46%	917	1.92%	633	1.82%
088	85,153	-2,807	-3.09%	20,523	23.28%	421	20,944	23.76%	14,069	21.67%	2,012	3.11%	2,707	3.07%
089	45,107	-373	-0.82%	7,974	17.68%	109	8,083	17.92%	5,411	16.47%	1,073	2.88%	815	2.48%
090	43,477	-2,003	-4.40%	21,284	48.95%	142	21,426	49.28%	14,176	48.41%	678	1.86%	486	1.56%
091	45,597	117	0.26%	9,954	21.83%	89	10,043	22.03%	7,116	20.96%	362	1.07%	543	1.99%
092	42,387	-2,093	-4.60%	19,064	43.94%	236	19,290	44.46%	12,891	40.82%	821	1.89%	565	1.79%
093	44,343	-1,137	-2.50%	15,627	35.35%	125	15,802	35.64%	11,132	34.31%	427	1.32%	623	1.40%
094	43,527	-1,953	-4.29%	18,361	42.18%	162	18,523	42.56%	13,649	40.04%	609	1.40%	430	1.26%
095	44,590	-890	-1.96%	21,491	48.20%	141	21,632	48.51%	14,979	45.10%	250	0.75%	197	0.89%
096	46,835	1,355	2.98%	18,105	38.66%	381	18,486	39.47%	12,630	35.20%	1,155	2.47%	807	2.25%
097	43,531	-1,949	-4.29%	24,834	57.05%	401	25,235	57.97%	16,994	53.24%	1,198	2.75%	806	2.33%
098	44,196	-1,284	-2.82%	27,107	61.33%	395	27,502	62.23%	19,044	57.63%	751	1.70%	524	1.59%
099	43,263	-2,217	-4.87%	16,887	39.03%	413	17,300	39.99%	10,896	36.50%	1,210	2.80%	749	2.51%

DISTRICT	POPULATION	DEVIATION	%	BLACK	BLACK	COMBO	TOTAL	TOTAL	HISPOR	LATINO	%HISP.
100	44,193	-1,287	-2.83%	23,801	15,217	425	24,226	54.82%	1,847	3,598	3.50%
101	47,223	2,253	4.75%	18,346	38,436	179	18,525	38.81%	715	1,506	1.50%
102	46,812	1,332	2.83%	16,445	35,136	88	16,533	35.32%	1,462	3,126	3.12%
103	43,813	-1,667	-3.67%	22,148	50,556	116	22,264	50.82%	509	1,166	1.16%
104	45,337	57	0.13%	13,620	29,916	125	13,745	30.19%	468	1,036	1.03%
105	47,008	1,528	3.30%	29,625	20,214	108	29,836	63.47%	473	1,016	1.01%
106	47,513	2,033	4.47%	9,172	19,306	126	9,298	19.52%	657	1,456	1.45%
107	47,542	2,062	4.52%	32,507	68,386	222	32,729	68.84%	668	1,416	1.41%
108	46,736	1,256	2.76%	14,123	30,226	207	14,390	30.79%	1,178	3,166	3.16%
109	44,376	-1,104	-2.43%	14,617	32,946	261	14,878	33.53%	1,354	3,056	3.05%
110	45,737	257	0.57%	6,726	14,716	119	6,845	14.92%	772	1,696	1.69%
111	43,443	-2,037	-4.48%	25,509	58,726	523	26,032	59.92%	2,175	5,206	5.20%
112	43,553	-1,627	-3.58%	18,751	42,766	209	18,980	43.28%	1,210	3,606	3.60%
113	43,506	-1,674	-3.68%	25,213	57,566	630	25,843	58.99%	2,440	5,576	5.57%
114	44,733	-707	-1.55%	24,556	54,556	138	24,694	55.15%	1,455	3,256	3.25%
115	44,331	-1,129	-2.48%	13,344	30,096	221	13,565	30.59%	1,332	3,006	3.00%
116	44,110	-1,370	-3.01%	19,888	13,167	62	13,169	41.48%	1,393	3,166	3.16%
117	47,750	2,270	4.99%	7,312	15,316	231	7,547	15.80%	1,419	2,976	2.97%
118	43,713	-1,767	-3.89%	13,287	30,406	87	13,374	30.60%	620	1,426	1.42%
119	43,904	-1,576	-3.47%	15,269	34,786	121	15,390	35.05%	509	1,166	1.16%



DISTRICT	POPULATION	DEVIATION	% DEVIATION	% BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP OR LATINO	%HISP.
120	46,731	1,251	2.75%	12,721	27.22%	115	12,836	27.47%	3,047	6.52%
VAP	33,993			8,505	25.02%	55	8,560	25.15%	1,856	5.55%
121	94,840	3,580	4.27%	26,758	28.25%	501	27,259	28.77%	6,400	6.84%
VAP	69,119			18,501	26.77%	152	18,653	27.03%	4,276	6.19%
122	46,286	806	1.77%	15,559	33.55%	244	15,774	34.08%	1,143	2.47%
VAP	33,195			10,409	31.36%	116	10,525	31.71%	809	2.41%
123	47,747	2,267	4.98%	6,765	14.17%	222	6,987	14.63%	1,302	2.73%
VAP	34,582			4,354	12.68%	73	4,457	12.89%	855	2.47%
124	86,779	-4,181	-4.60%	51,044	58.82%	556	51,600	59.46%	2,099	2.42%
VAP	64,295			34,531	53.71%	280	34,811	54.14%	1,514	2.35%
125	44,644	-836	-1.84%	22,198	49.72%	275	22,473	50.34%	775	1.74%
VAP	33,869			15,260	45.06%	138	15,398	45.46%	559	1.65%
126	47,657	2,177	4.79%	3,842	8.06%	111	3,953	8.29%	705	1.48%
VAP	36,771			2,636	7.17%	49	2,685	7.30%	465	1.26%
127	47,662	2,182	4.80%	10,692	22.43%	422	11,114	23.32%	1,933	4.66%
VAP	33,755			6,892	20.42%	133	7,025	20.81%	1,222	3.62%
128	44,652	-828	-1.82%	22,297	49.94%	493	22,790	51.04%	1,880	4.21%
VAP	31,303			14,677	46.89%	175	14,852	47.45%	1,222	3.90%
129	95,060	4,100	4.51%	21,966	23.11%	439	22,405	23.57%	3,608	3.80%
VAP	65,111			14,366	21.09%	145	14,511	21.30%	2,360	3.46%
130	45,022	-458	-1.01%	11,176	24.82%	136	11,312	25.13%	3,840	8.53%
VAP	32,132			7,478	23.27%	46	7,524	23.42%	2,359	7.34%
131	46,341	861	1.89%	12,243	26.42%	108	12,351	26.65%	1,531	3.30%
VAP	34,227			8,255	24.12%	45	8,300	24.25%	1,037	3.03%
132	43,304	-2,176	-4.78%	15,992	36.93%	130	16,122	37.23%	803	1.85%
VAP	31,817			10,684	33.58%	63	10,747	33.78%	535	1.68%
133	43,375	-2,105	-4.63%	19,705	45.43%	334	20,039	46.20%	2,072	4.75%
VAP	31,561			13,719	43.47%	158	13,877	43.97%	1,403	4.45%
134	43,239	-2,241	-4.93%	20,234	46.80%	110	20,344	47.05%	534	1.23%
VAP	31,533			13,357	42.36%	54	13,411	42.53%	314	1.00%
135	43,390	-2,090	-4.60%	28,384	65.42%	205	28,589	65.89%	684	1.55%
VAP	31,050			18,803	60.56%	94	18,897	60.86%	456	1.47%
136	43,351	-2,129	-4.68%	28,364	65.43%	163	28,527	65.80%	495	1.14%
VAP	31,163			19,118	61.35%	86	19,204	61.62%	326	1.05%
137	47,504	2,024	4.45%	6,975	14.68%	111	7,086	14.92%	2,367	4.98%
VAP	34,376			4,687	13.63%	49	4,736	13.78%	1,497	4.35%
138	46,891	1,411	3.10%	16,703	35.62%	98	16,801	35.83%	3,480	7.42%
VAP	33,248			10,756	32.25%	33	10,789	32.35%	2,428	7.28%
139	44,064	-1,416	-3.11%	8,908	20.22%	123	9,031	20.50%	1,786	4.05%
VAP	32,035			5,589	17.45%	43	5,632	17.58%	1,100	3.43%

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP.OR LATINO	%HISP.
140	43,309	-2,171	-4.77%	18,790	43.39%	142	18,932	43.71%	1,813	4.19%
VAP	31,243			12,468	39.91%	58	12,526	40.09%	1,134	3.65%
141	86,466	-4,494	-4.94%	31,697	36.66%	263	31,960	36.96%	2,797	3.23%
VAP	62,666			20,873	33.31%	132	21,005	33.52%	1,848	2.95%
142	43,318	-2,162	-4.75%	17,235	39.79%	208	17,443	40.27%	899	2.08%
VAP	32,483			11,409	35.12%	110	11,519	35.46%	623	1.92%
143	43,255	-2,225	-4.89%	13,435	31.06%	229	13,664	31.59%	1,135	2.62%
VAP	31,454			9,275	29.49%	85	9,360	29.76%	775	2.46%
144	46,486	1,006	2.21%	14,379	30.93%	148	14,527	31.25%	1,950	4.19%
VAP	33,820			9,721	28.74%	78	9,799	28.97%	1,304	3.86%
145	43,725	-1,755	-3.86%	11,375	26.01%	129	11,504	26.31%	742	1.70%
VAP	32,752			7,992	24.40%	56	8,048	24.57%	475	1.45%
146	47,668	2,188	4.81%	3,661	7.68%	102	3,763	7.89%	1,148	2.41%
VAP	35,929			2,511	6.99%	38	2,549	7.09%	773	2.15%
147	43,664	-1,816	-3.99%	8,783	20.11%	294	9,077	20.79%	1,585	3.63%
VAP	29,832			5,566	18.66%	89	5,655	18.96%	975	3.27%

Total Population 8,186,453

Ideal Value 45,480

Summary Statistics

Population Range 43,209 to 176,939

Absolute Range -6,708 to 4,504

Absolute Overall Range -11,212

Relative Range -14.75% to 9.90%

Relative Overall Range -24.65%