IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WASHINGTON

BERTHA ARANDA GLATT Plaintiff,

Case No. 4:16-CV-05108-LRS

v.

CITY OF PASCO, et al. Defendants.

DECLARATION OF WILLIAM S. COOPER

WILLIAM S. COOPER, acting in accordance with 28 U.S.C. §1746 and Rules 702 and 703 of the Federal Rules of Evidence, does hereby declare and say:

1. My name is William S. Cooper. I serve as a demographic and redistricting expert for the Plaintiffs in this matter. I am compensated at a rate of \$100 per hour for my work in this case.

Redistricting Experience

2. I have testified at trial as an expert witness on redistricting and demographics in federal courts in about 36 voting rights cases since the late 1980s. Three of these lawsuits resulted in changes to statewide legislative boundaries: Rural West Tennessee African-American Affairs v. McWherter, Old Person v. Cooney, and Bone Shirt v. Hazeltine. Approximately 25 of the cases led to changes in local election district plans.

- 3. Since the release of the 2010 Census, I have developed several statewide legislative plans (Alabama, Georgia, Kentucky, Florida, South Carolina, and Virginia) and about 150 local redistricting plans, primarily for groups working to protect minority voting rights.
- 4. During the 2010 redistricting cycle, four plans that I developed for local government clients Bolivar County, Mississippi; Claiborne County, Mississippi; the City of Grenada, Mississippi; and Sussex County, Virginia were adopted. In addition, I served as a redistricting consultant to the Miami-Dade County Commission and Board of Education.
- 5. In March 2014, I was retained by the City of Decatur, Alabama as a redistricting consultant in *Voketz v. City of Decatur*.
- 6. In December 2015, I was retained as a redistricting consultant by the City of Wenatchee, Washington with the charge to prepare a district-based plan which would replace the current at-large system. In June 2016, the Wenatchee Redistricting Committee presented a seven single-member district plan that I developed to the City Council, with a recommendation that the City switch to districts as soon as practicable.
- 7. Four federal courts have recently granted summary judgment on the first prerequisite (*Gingles 1*) of a Section 2 claim pursuant to *Thornburg v. Gingles*, 478 U.S. 30 (1986), based in part on my testimony: *Montes v. City of Yakima*, *Washington* (E.D. Wash. Aug. 22, 2014); *Pope v. Albany County, New York*

(N.D.N.Y. Jan. 28, 2014; N.D.N.Y. Mar. 24, 2015); Navajo Nation v. San Juan County, Utah (C.D. Utah. February 19, 2016); and NAACP v. Ferguson-Florissant School District, Missouri (E. D. Mo. August 22, 2016).

- 8. In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Section 2 violation, a seven single-member district plan that I developed for the plaintiffs. In *Pope v. Albany County*, the Court adopted a plan developed by the County defendants that was favored by the plaintiffs. The remedy phases in *Navajo Nation v. San Juan County* and *NAACP v. Ferguson-Florissant School District* are ongoing.
- 9. In 2016, two redistricting plans that I developed on behalf of the plaintiffs for consent decrees in Section 2 lawsuits were adopted (*NAACP v. Fayette County Georgia* and *NAACP v. Emanuel County, Georgia* (pending court approval)).
- 10. For additional historical information on my testimony as an expert witness and experience preparing and assessing proposed redistricting maps for Section 2 litigation and other efforts to promote compliance with the Voting Rights Act, see a summary of my redistricting work attached as **Exhibit A**.

I. INTRODUCTION

11. The attorneys for the Plaintiff in this matter asked me to develop a remedial seven single-member district plan, with three districts containing Latino citizen voting age (LCVAP) majorities. They also asked me to provide citywide demographics based on the decennial Census, as well as the American Community

Survey produced by the U.S. Census Bureau.

II. DEMOGRAPHIC PROFILE OF PASCO

12. The table in **Figure 1** summarizes key demographic data for Pasco from 2000 through 2015. The 2010 to 2015 period is discussed in detail in $\P13-22$ *infra*.

Figure 1

Pasco – 2000 to 2015 Population, Voting Age, and Citizen Distribution

	2000 Census	Percent	2010 Census	Percent	2010 Census adjusted for annexations	Percent	2015 Census Estimate	2010- 14 ACS*	2010-14 ACS adjusted for annexations*	2015 ACS*
Total Population	32,066	1009/	59,781	100%	62,452	1000/	69,451	*	*	*
Total Latinos				55.73%					*	*
Total NH White				38.72%					*	*
		<u> </u>				151111				
VAP Population	20,673	100.0%	38,576	100.0%	40,558	100%	NA	*	*	*
VAP Latinos	9,997			49.06%		47.30%	NA	*	*	*
VAP NH White	9,190			45.08%		46.90%	NA	*	*	*
Under 18 Population	11393	100.00	21,205	100.0%	21,894	100%	NA	*	*	*
Under 18 Latino				67.86%			NA	*	*	*
Under 18 NH White	2675	23.48%	5,761	27.17%	6,235	28.48%	NA	*	*	*
% Latino Citizen		NC		NA		NA	NA	46.0%	45.02.%	49.7%
% NH White Citizen		NC		NA		NA	NA	47.6%	NC	NA
% Latino Citizen VAP		NC		NA		NA	NA	32.9%	32.02%	38.5%
% NH White Citizen VAP		NC		NA		NA	NA	60.4%	NC	NA
% Latino Citizen Under 18		NC		NA		NA	NA	65.8%	64.86%	66.6%
% NH White Citizen Under 18		NC		NA		NA	NA	28.4%	NC	NA

NC=Not Calculated

NA=Not Available

^{*}Population estimates by race and ethnicity are reported in the ACS, but the Census Bureau suggests that the ACS tabulations should not be used in lieu of the separate Annual Population Estimate released by the Census Bureau.

2010 Census Demographics

- 13. Based on the 2010 Census, with the city limits adjusted for post-2010 annexations, Pasco has a total population of 62,452 and a Latino population of 33,735 (54.02%). The 2010 non-Hispanic White population is 25,257 (40.44%). The remainder minority population in Pasco (i.e., all persons who are not Latino or non-Hispanic White) is 3,460 (5.54%).
- 14. In Pasco, Latinos constitute a smaller percentage of the voting-age population than the total population, while the reverse is true for non-Hispanic Whites. Based on the 2010 Census with adjustments for annexations, Pasco has a voting-age population (VAP) of 40,558, of whom 19.183 (47.3%) are Latino. The 2010 non-Hispanic White VAP is 19,022 (46.9%).
- 15. In Pasco, Latinos comprise a larger percentage of the under-18 population (U18) than the total population. Based on the 2010 Census with adjustments for annexations, Pasco has a U18 population of 21,894, of whom 14,552 (66.47%) are Latino. The 2010 non-Hispanic White U18 population is 6,235 (28.48.0%).
- 16. Thus, according to the 2010 Census, Latinos in Pasco represent a majority of the total population, a plurality of the voting age population, and a

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¹ In this declaration, the terms "Latino" or "Hispanic" are used interchangeably. Unless otherwise noted. "White" refers to single race non-Hispanic White.

majority of the under-18 population.

Post-2010 Population Estimates

- 17. The U.S. Census Bureau's annual population estimate for Pasco (as of July 1, 2015) is 69,451, which represents an increase of 6,999 persons (11.21%) since 2010, after adjusting for annexations. The U.S. Census Bureau does not publish annual population estimates by race or voting age.
- 18. According to the annual population estimate published by the State of Washington Office of Financial Management (OFM), the April 1, 2016 population of Pasco is 70,560, which represents an increase of 8,108 persons (12.98%) since 2010. The OFM does not publish annual population estimates by race or voting age.

Citizen Population by Age Estimates

19. According to the 5-year 2010-2014 American Community Survey (ACS)², which does not take into account the 2014 and 2015 annexations, Latinos represent 46% of the citizen population in Pasco and 32.9% of the citizen voting age population (CVAP). By comparison, non-Hispanic Whites comprise 47.6% of the citizen population and 60.4% of the CVAP. Latinos constitute 65.8% of the U18 citizen population and non-Hispanic Whites represent 28.4% of the U18 citizen population.

² The midpoint of the 2010-2014 ACS period is July 1, 2012. Thus, estimates reported in the 5-year ACS are, on average, about four years behind current 2016 citizenship rates. A survey midpoint of July 1, 2016 will be reported in the 2014-2018 ACS, which will be released in December 2019.

- 20. Thus, according to the 2010-2014 ACS, Latinos in Pasco are a minority of the citizen population and CVAP, but a majority of the under-18 citizen population.
- 21. After adjusting the 2010-2014 ACS citizenship estimates for annexations in 2014 and 2015, the citywide Latino citizen population is 45.02%, the LCVAP is 32.02%, and the U18 citizen Latino population is 64.86%.
- 22. According to the 1-year 2015 ACS (released by the U.S. Census Bureau in September 2016), Latinos are 49.7% of the citizen population, 38.5% of the CVAP, and 66.6% of the U18 citizen population. Comparable figures for the non-Hispanic White population are not available. It should be noted that the 1-year ACS estimates have a high margin of error for cities with populations as small as Pasco. Pasco is just above the 65,000 population cut-off point, below which the Census Bureau releases only 5-year ACS reports.

Socio-Economic Comparison – Latinos vis-à-vis Whites

23. I am also submitting with this declaration a set of charts and tables I have prepared from the 3-year 2011-2013 ACS. (See Exhibit B.) This document shows that non-Hispanic Whites in Pasco outpace Latinos across a broad range of socio-economic measures.

Impact of Post-2010 Annexations

24. As shown in **Figure 1** and reproduced with a red font highlight in **Figure 2**, based on the 2010 Census, annexations since 2010 have reduced the

Latino population percentage in Pasco from 55.73% to 54.02%. By the same token, the annexations have resulted in an increase in the non-Hispanic White population from 45.08% to 46.90%.

Figure 2

Impact of Post-2010 Annexations and Potential Annexations

	2010 Census	Percent	2010 Census adjusted for annexations	Percent	2010 Census adjusted for potential annexations of remaining "doughnut holes"	Percent	2010-14 ACS*	2010-14 ACS adjusted for annexations	2010-14 ACS adjusted for annexations of remaining "donut holes
Total Population	59,781	100%	62,452	100%	63,660	100%	*	*	*
Total Latinos	33,314		33,735	54.02%		53.50%		*	*
Total NH White	23.150			40.44%				*	*
VAP Population	38,576	100.0%	40,558	100%	41,428	100%	*	*	*
VAP Latinos	18,924	49.06%	19,183	47.30%.	19,357	46.72%	*	*	*
VAP NH White	17,389	45.08%	19,022	46.90%	19,691	47.53%	60.4%	NC	NA
% Latino CVAP		NA		NA		NA	32.9%	32.02%	31.29%

25. Anticipated annexations of the remaining "donut holes" (unincorporated areas of Franklin County surrounded by west Pasco) will further reduce the Latino population to 53.50% and Latino VAP to 46.72%, based on the 2010 Census. The LCVAP would drop from 32.02%, based on the 2010-2014 ACS , to 31.29%.

II. REDISTRICTING

Methodology and Sources

- 26. I use a geographic information system software package called *Maptitude for Redistricting*, developed by the Caliper Corporation. This software is deployed by many local and state governing bodies across the country for redistricting and other types of demographic analysis.
- 27. The Census 2010 geographic boundary files that I used with *Maptitude* are created from the U.S. Census 2010 TIGER (Topologically Integrated Geographic Encoding and Referencing) files. The population data is from the 2010 PL 94-171 data file. This dataset is published in electronic format and is the complete count population file designed by the U.S. Census Bureau for use in legislative redistricting.³ The file contains basic race and ethnicity data on the population and voting age population found in units of census geography such as states, counties, municipalities, townships, reservations, school districts, census tracts, census block groups, and census blocks.
- 28. The Maptitude for Redistricting software processes the TIGER files to produce a map for display on a computer screen. The software also merges demographic data from the PL94-171 file to match the 2010 Census geography.

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³ I also used the U.S. Census 2000 TIGER file and the 2000 PL 94-171 data file to analyze population trends in Pasco over the 2000 to 2010 period.

- 29. In addition, I obtained electronic geographic shapefiles from the Franklin County GIS Department website, which delineate the current precinct boundaries for Pasco and Franklin County, the current Pasco City boundaries (including the July 2015 annexation), and the five single-member district election plan adopted by the City of Pasco in 2015.⁴
- 30. I also relied on a block-level geographic shapefile provided by the Defendants to the Plaintiff's attorneys, which identifies all census blocks within the current city boundaries.
- 31. I created the *Plaintiff's Remedial Plan* at the census block level from the 2010 Census using *Maptitude for Redistricting* and the Defendants' block-level shapefile. A census block is the smallest geographic tabulation area from the decennial census. A block may be as small as a regular city block bounded by four streets, or as large as several square miles in a rural area. Generally, a census block is bounded on all sides by visible features such as streets, rivers, and railroad tracks.
- 32. The ACLU of Washington also gave me a Microsoft *Excel* file that lists all registered voters in Pasco as of November 30, 2015. I understand that this file was prepared by the Franklin County Elections Department.

⁴ Available for download at: http://gis.co.franklin.wa.us/download.asp

- 33. In order to determine Latino registered voters, I relied on a Microsoft *Excel* file that lists over 12,000 Spanish surnames. This file was prepared by the U.S. Department of Justice (DOJ) in order to identify Latino voters. I used the Spanish surname file to identify Latino voters in the November 2015 registered voter list.
- 34. I matched the November 2015 registered voter list to the Spanish surname list using a Microsoft *Access* routine. In short, I parsed the surname for all registered voters and then marked all persons with a matching Spanish surname. This match includes a few persons with surnames that only in part match Spanish surnames on the DOJ list. (For example, the compound surname "Vega de la Fuente" would be marked as a Spanish surname because both "Vega" and "Fuente" are Spanish surnames on the DOJ list.)
- 35. I used *Maptitude* to geocode the November 2015 City of Pasco registered voter list. Geocoding is a technical process available in GIS software that locates voters by street number and address and converts those locations to points on a computer map. The points can then be tallied to calculate the number of registered voters and Latino registered voters by district.
- 36. I developed block-level estimates of the citizen voting age population (Hispanic and non-Hispanic) from the block group estimates in the 2010-2014 American Community Survey 5-year Estimates dataset prepared by the U.S. Census

Bureau.⁵ I allocated the estimated Hispanic and non-Hispanic block group citizen voting age population to census blocks based on the complete count block-level voting age Hispanic and non-Hispanic population, according to the 2010 Census. Census block estimates of the citizen voting age population are not available from the American Community Survey or any other Census Bureau publication.

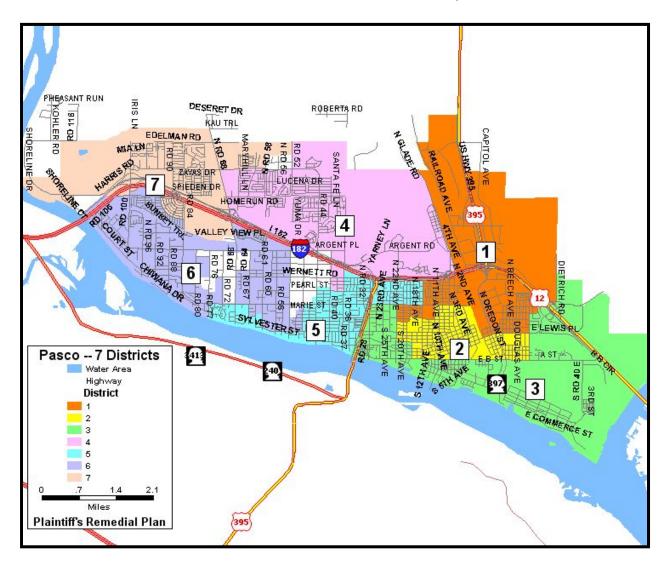
Plaintiff's Remedial Plan

- 37. I developed the *Plaintiff's' Remedial Plan* depicted in **Figure 3** on the next page. The plan has seven single-member districts. Three of the districts (Districts 1, 2, and 3) are majority-LCVAP. **Exhibit C-1** contains a similar map with additional street detail.
- 38. For comparison, the map in **Exhibit C-2** overlays the color-coded *Plaintiff's Remedial Plan* with the current 5-district hybrid residency at-large plan (depicted with thick blue lines).

⁵ This special file is released on an annual basis at the block group-level. I relied on the most recent dataset, which was released in February 2016 and is available for download at:

Figure 3

Plaintiff's Remedial Plan – 7 Districts – Pasco City Council



39. The table in **Figure 4** on the next page summarizes population statistics by district for *Plaintiff's Remedial Plan*. **Exhibit C-2** contains detailed population statistics.

Figure 4

Plaintiff's Remedial Plan – Population Summary

District	Population	% Dev	% Latino	18+ Pop	% 18+ Latino	% 18+ NH White	% Latino CVAP	% Latino of Registered Voters
1	8724	-2.22%	83.59%	5165	78.64%	16.63%	54.78%	65.76%
2	8865	-0.64%	82.22%	5596	76.86%	18.10%	56.29%	65.33%
3	8587	-3.75%	83.39%	5187	77.71%	19.18%	54.08%	61.73%
4	9026	1.17%	27.64%	6090	23.04%	70.90%	27.37%	19.25%
5	8980	0.65%	52.31%	6108	43.57%	50.61%	28.98%	27.25%
6	9102	2.02%	23.90%	6365	19.51%	73.89%	14.24%	15.45%
7	9168	2.76%	28.64%	6047	24.52%	66.86%	24.04%	20.36%

40. A description of the *Plaintiff's Remedial Plan* as it relates to traditional redistricting principles and additional redistricting factors follows.

One-person, One-vote

41. The *Plaintiff's Remedial Plan* is drawn at the census block level, based on population counts from the 2010 Census. The *Plaintiff's Remedial Plan* complies with one-person one-vote, with an overall deviation of 6.51% from the ideal population size of 8,922. (62,452 divided by 7).

Non-dilution of Minority Vote

- 42. The three majority-LCVAP districts range from 54.08% LCVAP in District 3 to 56.29% LCVAP in District 2. The percentage of registered voters who are Latino range from 61.73% in District 3 to 65.76% in District 1.
- 43. In addition, the *Plaintiff's Remedial Plan* features an "influence district" District 5 (52.31% Latino, 43.57% Latino VAP, 28.98% LCVAP, and

- 27.25% Latino registered voters) that roughly corresponds to citywide demographics (54.02% Latino, 47.3% Latino VAP, 30.02% LCVAP, and 29.81% Latino registered voters).
- 44. An influence district is one in which Latinos (or other minorities) are not a majority of all voters, but have sufficient voting strength to occasionally affect the outcome of the election in coalition with other voters. For example, in the 2014 elections in the City of Yakima, voters in District 3 (25.2% LCVAP) elected a Latina candidate.⁶
- 45. Under the 2000 Census, Plaintiff's District 5 was 34.4% Latino, with a Latino VAP of 28.5%, which was significantly lower than the corresponding 2010 Census percentages (52.31% Latino and 43.57% Latino VAP).
- 46. Thus, over the 2000 to 2010 period, Plaintiff's District 5 transitioned from an area with a Census 2000 Latino population percentage (34.4%) that was significantly less than the citywide Census 2000 Latino population percentage (56.02%) to one that mirrors the 2010 citywide demographics.
- 47. Given the 2000 to 2010 trend, Plaintiff's District 5 is likely to maintain or exceed the citywide Latino percentage over the next decade, and thereby remain a viable influence district.

⁶ See Mike Faulk, *New Yakima City Council Finalized with Mendez Win*, Yakima Herald (Nov. 5, 2015), http://www.yakimaherald.com/news/elections/new-yakima-city-council-finalized-with-mendez-win/article_4c4b3dc2-8452-11e5-a5bd-9b2fd02199ca.html

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Contiguity

48. All districts in the *Plaintiff's Remedial Plan* are contiguous. With respect to redistricting plans, "contiguity" signifies that all parts (i.e., census blocks) of each component election district are connected and there are no geographically disparate areas.

Compactness

- 49. A visual assessment confirms that the *Plaintiff's Remedial Plan* is compact. The plan is regularly shaped to the extent possible because it is drawn using 2010 census blocks. Census blocks often take on irregular shapes in order to follow jurisdictional lines such as city limits or clearly observable boundaries such as streams or roads.
- 50. In my opinion, the *Plaintiff's Remedial Plan* is also compact according to standard measures of compactness, as computed using *Maptitude for Redistricting*.⁷
- 51. The table in **Figure 5** on the next page presents compactness scores for the *Plaintiff's Remedial Plan*, according to the Reock test⁸ and the Polsby-Popper

⁷ There is no bright-line rule on what constitutes a "passing grade" in terms of compactness scores. For a detailed discussion of compactness scores see *Bethune-Hill v. Virginia State Board of Elections* – 141 F.Supp.3d 505, 515, 535-546,(D. Va. 2015); cert granted 2016 WL 3128979 (U.S. 2016) – pp. 62-66 with a district-by-district compactness analysis in the pages that follow.

test⁹.

Figure 5

Plaintiff's Remedial Plan – Compactness Scores

District	Reock	Palsy-Popper
1	0.41	0.31
2	0.32	0.43
3	0.34	0.31
4	0.4	0.49
5	0.23	0.27
6	0.32	0.18
7	0.24	0.29
Mean Average	0.32	0.33

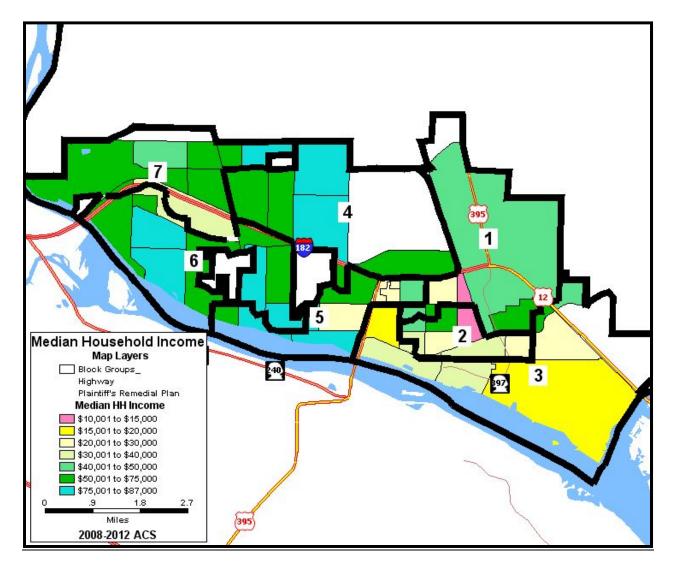
Communities of Interest

52. The *Plaintiff's Remedial Plan* is drawn to respect communities of interest reflected in socio-economic disparities between east Pasco and west Pasco as shown in **Figure 6** on the next page.

⁸ The Reock test is an area-based measure that compares each district to a circle, which is considered to be the most compact shape possible. For each district, the Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district. The measure is always between 0 and 1, with 1 being the most compact. The Reock test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan." (Source: *Maptitude For Redistricting* documentation.)

⁹ The Polsby-Popper test computes the ratio of the district area to the area of a circle with the same perimeter. The measure is always between 0 and 1, with 1 being the most compact. The Polsby-Popper test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan. (Source: *Maptitude For Redistricting* documentation.)

Figure 6
Median Household Income by Block Group



53. The *Plaintiff's Remedial Plan* is depicted with thick black lines in **Figure 6** and overlays block group-level median household income estimates from the 2008 to 2012 ACS. Three LCVAP-majority districts are anchored in lower income east Pasco and three White-majority districts are in higher income west Pasco. District 5 – the seventh district – extends into both east and west Pasco,

encompassing neighborhoods that are transitioning into more ethnically diverse populations.

<u>Precincts</u>

54. *Plaintiff's Remedial Plan* generally follows 2015 precinct boundaries. (See **Exhibit C-3**.) Populated areas of 7 of the 67 precincts entirely within the city limits of Pasco are split by *Plaintiff's Remedial Plan* district boundaries, with a few additional splits where the affected precincts are split by the current City boundary. Alterations to existing precinct lines have little practical relevance to voters and candidates in Pasco, because all ballots are cast by mail, and voters therefore no longer need go to a precinct-specific polling place to vote. No census blocks are split by district boundaries under *Plaintiff's Remedial Plan*.

<u>Incumbent Assignments</u>

55. *Plaintiff's Remedial Plan* minimizes incumbent conflicts. Of the six current council members, two incumbents who live in the same neighborhood (Rebecca Francik and Tom Larsen) are assigned to District 5. LCVAP-majority District 2 is without a resident incumbent. District 7—encompassing northwest Pasco — does not have an incumbent. However, at least nine of the candidates who filed to fill the vacancy in current District 4 reside in Plaintiff's District 7. ¹⁰ (I

¹⁰ Source: *Tri-City Herald*, "11 file to be Pasco City Council's newest member" http://www.tri-cityherald.com/news/local/article105799716.html

am unable to identify the resident addresses for two of the candidates.) The chart in **Figure 7** details incumbent assignments by district under *Plaintiff's Remedial Plan*.

Figure 7

Plaintiff's Remedial Plan Incumbent Assignments by District

Incumbent	District
Yenney	1
Hoffmann	2
Martinez	4
Larsen	5
Francik	5
Watkins	6

IV. CONCLUSION

- 56. The *Plaintiff's Remedial Plan* respects traditional redistricting criteria, including one-person one-vote, compactness, contiguity, respect for communities of interest, and the non-dilution of minority voting strength.
- 57. The *Plaintiff's Remedial Plan* will afford Latinos an opportunity to elect their candidate of choice in three districts, with a reasonable opportunity to have a meaningful influence on the vote for the council member elected from District 5.
- 58. As part of my work on this matter, I have reviewed several plans under consideration by the Defendants with six single-member districts and one at-large

member. In my opinion, a plan with an at-large member would not be a full and complete remedy.

- 59. There are at least two factors which militate against at-large voting as a fair remedy in this lawsuit. First, there is no guarantee that dilutive annexations will not occur in the future (beyond closing the "donut holes" in west Pasco), putting further downward pressure on the citywide LCVAP and Latino registered voter percentage. Second, there is a sharp socio-economic divide between predominantly Latino east Pasco and predominantly White west Pasco as shown in the median household income map in **Figure** 6 *supra* and in the ACS charts and tables in **Exhibit B**.
- 60. This geographic and socio-economic divide would disadvantage campaign funding and get-out-the vote efforts for Latino candidates in an at-large election compared to an election in a geographically smaller and less populous single-member district.
- 61. Therefore, the Plaintiff's seven single-member district plan with a geographically small "influence district" (District 5) that mirrors citywide demographics would be the optimal remedial solution.
- 62. The ideal population size under a 6-district plan is about 17% larger than the ideal population size under a 7-district plan. For example, based on the 2010 Census, the ideal population size in Pasco under a 7-district plan is 8,922. Under a 6-district plan, the ideal population size is 10,409. All other things equal,

campaign funding and get-out the vote efforts will be less costly under a 7-district plan than under a 6-district plan.

63. In my opinion, even at the district level, the Plaintiff's 7-district plan is a superior Section 2 remedy compared to the 6-district/ 1at-large plans considered by the Defendants.

Executed on: October 15, 2016

WILLIAM S. COOPER

Exhibit A

William S. Cooper P.O. Box 16066 Bristol, VA 24209 276-669-8567 bcooper@msn.com

Summary of Redistricting Work

I have a B.A. in Economics from Davidson College in Davidson, North Carolina.

Since 1986, I have prepared proposed redistricting maps of approximately 700 jurisdictions for Section 2 litigation, Section 5 comment letters, and for use in other efforts to promote compliance with the Voting Rights Act of 1965. I have analyzed and prepared election plans in over 100 of these jurisdictions for two or more of the decennial censuses – either as part of concurrent legislative reapportionments or, retrospectively, in relation to litigation involving many of the cases listed below.

Since the release of the 2010 Census in February 2011, I have developed statewide legislative plans on behalf of clients in seven states (Alabama, Florida, Georgia, Kentucky, South Carolina, Texas, and Virginia), as well as over 150 local redistricting plans in approximately 30 states – primarily for groups working to protect minority voting rights.

In March 2011, I was retained by the Sussex County, Virginia Board of Supervisors and the Bolivar County, Mississippi Board of Supervisors to draft new district plans based on the 2010 Census. In the summer of 2011, both counties received Section 5 preclearance from the Department of Justice.

Also in 2011, I was retained by way of a subcontract with Olmedillo X5 LLC to assist with redistricting for the Miami-Dade County, Florida Board of Commissioners and the Miami-Dade, Florida School Board. Final plans were adopted in late 2011 following public hearings.

In the fall of 2011, I was retained by the City of Grenada, Mississippi to provide redistricting services. The ward plan I developed received preclearance in March 2012.

In 2012 and 2013, I served as a redistricting consultant to the Tunica County, Mississippi Board of Supervisors and the Claiborne County, Mississippi Board of Supervisors.

I currently serve as a redistricting consultant to the City of Decatur, Ala. (in *Voketz* v. *City of Decatur*).

I am currently a consultant and expert for the plaintiffs in Alabama Legislative Black Caucus et al. v. Alabama; Navajo Nation v. San Juan County, Utah; Fairley et al. v. Hattiesburg, Mississippi; Terrebonne Parish Branch NAACP et al. v. Jindal et al.; Davidson v. City of Cranston, Rhode Island; Missouri State Conference NAACP et al. v. Ferguson-Florissant School District; NAACP v. Emanuel County, Georgia and NAACP v. Gwinnett County.

In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Voting Rights Act Section 2 violation, a seven single-member district plan that I developed for the Latino plaintiffs. In *Pope v. Albany County* (N.D.N.Y. Mar. 24, 2015), the court approved, as a remedy for the Section 2 violation, a plan drawn by the defendants, creating a new Black-majority district. The plaintiffs consented to that plan, and the plan was be implemented for elections in 2015.

On January 14, 2016, in *NAACP v. Fayette County*, the Fayette County, Georgia Commission and Board of Education adopted a settlement plan that I developed for the plaintiffs under a court-ordered mediation. The plan was signed into law by Governor Deal in March 2016.

Since 2011, I have served as a redistricting and demographic consultant to the

Massachusetts-based Prison Policy Initiative and to Demos for a nationwide project to end prison-based gerrymandering. I have analyzed proposed and adopted election plans in about 25 states as part of my work with these two organizations.

During the 2000s, I analyzed census data and prepared draft election plans involving about 300 local-level jurisdictions in 25 states. I produced these plans at the request of local citizens' groups, national organizations such as the NAACP and, in a few instances, by contract with local governments. Election plans I developed for two counties – Sussex County, Virginia and Webster County, Mississippi – were adopted and precleared in 2002 by the U.S. Department of Justice. A ward plan I prepared for the City of Grenada, Mississippi was precleared in August 2005. A county council plan I developed for Native American plaintiffs in a Section 2 lawsuit (*Blackmoon v. Charles Mix County*) was adopted by Charles Mix County, South Dakota in November 2005. A county supervisors' plan I produced for Bolivar County, Mississippi was precleared in January 2006. A plan I drafted for Latino plaintiffs in Bethlehem, Pennsylvania (*Pennsylvania Statewide Latino Coalition v. Bethlehem Area School District*) was adopted in March 2009. Plans I developed for minority plaintiffs in Columbus County, North Carolina and Cortez-Montezuma School District in Colorado were adopted in 2009.

In addition, during the post-2000 reapportionment process, I drafted proposed statewide legislative plans on behalf of clients in eight states – Florida, Montana, New Mexico, North Dakota, South Dakota, Tennessee, Virginia, and Wyoming. In August 2005, a federal court ordered the State of South Dakota to remedy a Section 2 voting rights violation and adopt a state legislative plan I developed (*Bone Shirt v. Hazeltine*).

From 1986 to 2016, I have prepared election plans for Section 2 litigation in Alabama, Connecticut, Florida, Georgia, Louisiana, Maryland, Mississippi, Missouri,

Montana, Nebraska, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee, Utah, Virginia, Washington, and Wyoming.

I have testified at trial as an expert witness on redistricting and demographics in federal courts in the following voting rights cases (approximate most recent testimony dates are in parentheses). I filed declarations and was deposed in most of these cases.

Alabama

Alabama Legislative Black Caucus et al. v. Alabama et al. (2013)

Colorado

Cuthair v. Montezuma-Cortez School Board (1997)

Georgia

Cofield v. City of LaGrange (1996) Love v. Deal (1995) Askew v. City of Rome (1995) Woodard v. Lumber City (1989)

Louisiana

Knight v. McKeithen (1994) Reno v. Bossier Parish (1995) Wilson v. Town of St. Francisville (1997)

Maryland

Cane v. Worcester County (1994)

Mississippi

Addy v Newton County (1995)
Boddie v. Cleveland (2003)
Boddie v. Cleveland School District (2010)
Ewing v. Monroe County(1995)
Fairley v. Hattiesburg (2014)
Fairley v. Hattiesburg (2008)
Jamison v. City of Tupelo (2006)
Gunn v. Chickasaw County (1995)
NAACP v. Fordice (1999)
Nichols v. Okolona (1995)
Smith v. Clark (1995)

Montana

Old Person v. Cooney (1998) Old Person v. Brown (on remand) (2001)

Missouri

Missouri NAACP v. Ferguson-Florissant School District (2016)

Nebraska

Stabler v. Thurston County (1995)

New York

Arbor Hills Concerned Citizens v. Albany County (2003) Pope v. County of Albany (2015)

South Carolina

Smith v. Beasley (1996)

South Dakota

Bone Shirt v. Hazeltine (2004) Cottier v. City of Martin (2004)

Tennessee

Cousins v. McWherter (1994) Rural West Tennessee African American Affairs Council v. McWherter (1993)

Virginia

Henderson v. Richmond County (1988) McDaniel v. Mehfoud (1988) White v. Daniel (1989) Smith v. Brunswick County (1991)

Wyoming

Large v. Fremont County (2007)

In addition, I have filed declarations or been deposed in these cases:

Alabama

Voketz v. City of Decatur (2014)

Florida

Calvin v. Jefferson County (2016) Thompson v. Glades County (2001) Johnson v. DeSoto County (1999) Burton v. City of Belle Glade (1997)

Georgia

Georgia State Conference NAACP, et al. v. Fayette County (2015) Knighton v. Dougherty County (2002) Johnson v. Miller (1998) Jones v. Cook County (1993)

Kentucky

Herbert v. Kentucky State Board of Elections (2013)

Louisiana

Terrebonne Parish NAACP v. Jindal, et al. (2016) NAACP v. St. Landry Parish Council (2005) Rodney v. McKeithen (1993) Prejean v. Foster (1998)

Maryland

Fletcher v. Lamone (2011)

Mississippi

Partee v. Coahoma County (2015)
Figgs v. Quitman County (2015)
West v. Natchez (2015)
Williams v. Bolivar County (2005)
Clark v. Calhoun County (on remand)(1993)
Houston v. Lafayette County (2002)
Wilson v. Clarksdale (1992)
Stanfield v. Lee County(1991)
Teague v. Attala County (on remand)(1993)

Montana

Alden v. Rosebud County (2000)

North Carolina

Lewis v. Alamance County (1991) Gause v. Brunswick County (1992) Webster v. Person County (1992)

Rhode Island

Davidson v. City of Cranston (2015)

South Carolina

Vander Linden v. Campbell (1996)

South Dakota

Emery v. Hunt (1999) Kirkie v. Buffalo County (2004

Tennessee

NAACP v. Frost, et al. (2003)

Utah

Navajo Nation v. San Juan County (2016)

Virginia

Moon v. Beyer (1990)

Washington

Montes v. City of Yakima (2014)

###

Exhibit B

Selected Socio-Economic Data

Pasco city, Washington

Latino and White, Not Hispanic

Data Set: 2011-2013 American Community Survey 3-Year Estimates

www.fairvote2020.org

www.fairdata2000.com

30-Apr-16

C02003. RACE - Universe: TOTAL POPULATION

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Pasc	Pasco city, Washington		
	Population	Margin of Error (+/-)	% of Total	
Total:	66,289	49	100.0%	
Population of one race:	64,381	580	97.1%	
White	41,222	2,052	62.2%	
Black or African American	1,244	472	1.9%	
American Indian and Alaska Native	308	203	0.5%	
Asian alone	1,379	300	2.1%	
Native Hawaiian and Other Pacific Islander	23	39	0.0%	
Some other race	20,205	2,056	30.5%	
Population of two or more races:	1,908	577	2.9%	
Two races including Some other race	677	411	1.0%	
Two races excluding Some other race, and three or more races	1,231	429	1.9%	
Population of two races:	1,898	575	2.9%	
White; Black or African American	646	384	1.0%	
White; American Indian and Alaska Native	273	165	0.4%	
White; Asian	287	199	0.4%	
Black or African American; American Indian and Alaska Native	0	113	0.0%	
All other two race combinations	692	413	1.0%	
Population of three races	10	17	0.0%	
Population of four or more races	0	113	0.0%	

Note: Hispanics may be of any race. See Table C03002 and chart.

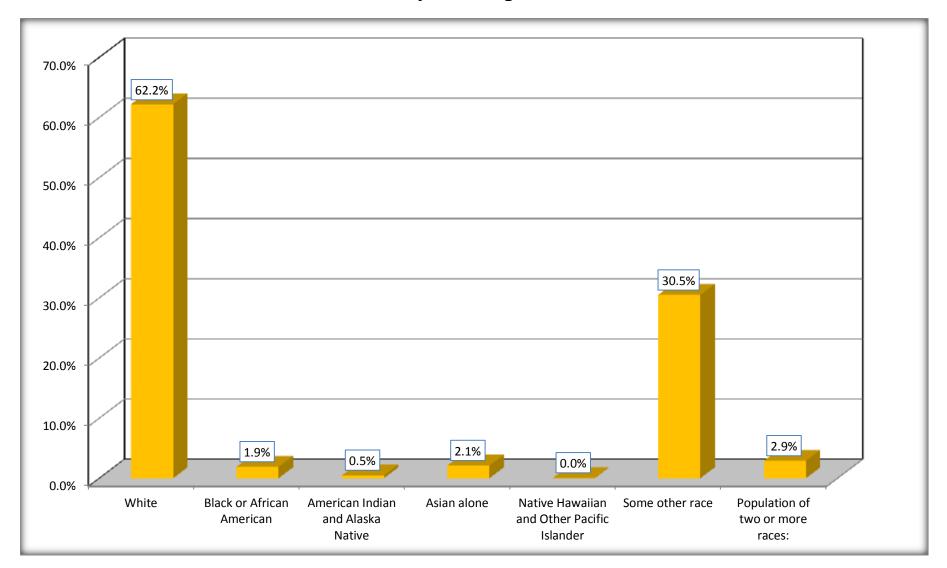
Source: U.S. Census Bureau, 2011-2013 American Community Survey

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology. http://www.census.gov/acs/www/UseData/index.htm

Population by Race

Pasco city, Washington



Source: C02003. RACE - Universe: TOTAL POPULATION

Data Set: 2011-2013 American Community Survey 3-Year Estimates

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C03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Paso	Pasco city, Washington			
	Population	Margin of Error (+/-)	% of Total		
Total:	66,289	49	100.0%		
Not Hispanic or Latino:	29,664	841	44.7%		
White alone	25,886	872	39.1%		
Black or African American alone	975	355	1.5%		
American Indian and Alaska Native alone	308	203	0.5%		
Asian alone	1,318	309	2.0%		
Native Hawaiian and Other Pacific Islander alone	0	113	0.0%		
Some other race alone	23	38	0.0%		
Two or more races:	1,154	477	1.7%		
Two races including Some other race	129	207	0.2%		
Two races excluding Some other race, and three or more races	1,025	432	1.5%		
Hispanic or Latino	36,625	846	55.3%		

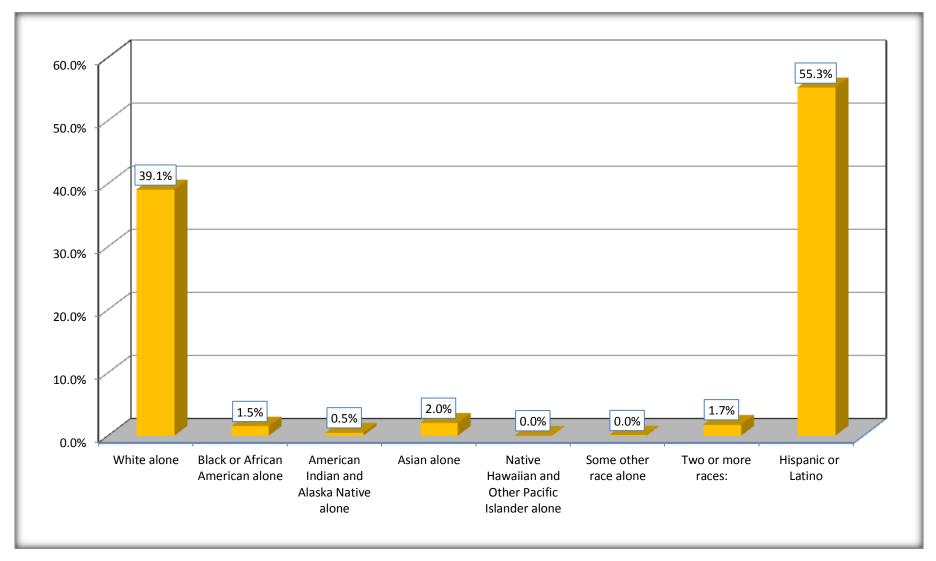
Source: U.S. Census Bureau, 2011-2013 American Community Survey

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology. http://www.census.gov/acs/www/UseData/index.htm

Non-Hispanic by Race and Hispanic Population

Pasco city, Washington



Source: C03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION

Data Set: 2011-2013 American Community Survey 3-Year Estimates

B03002. HISPANIC OR LATINO ORIGIN BY RACE

Data Set: 2011-2013 American Community Survey 3-Year Estimates

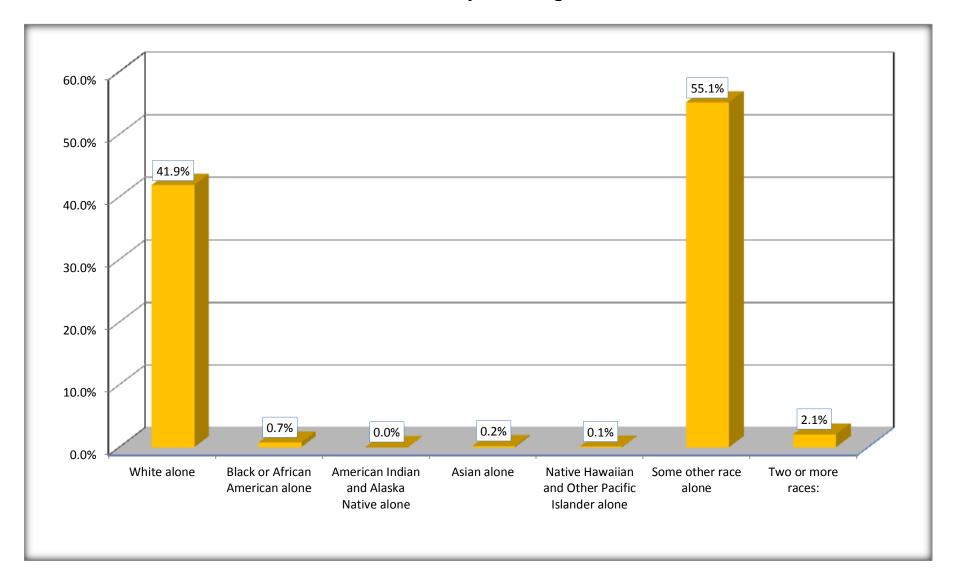
	Pasc	Pasco city, Washington				
	Population Margin of Error (+/-)					
Hispanic or Latino:	36,625	846	100.0%			
White alone	15,336	2,182	41.9%			
Black or African American alone	269	260	0.7%			
American Indian and Alaska Native alone	0	113	0.0%			
Asian alone	61	61	0.2%			
Native Hawaiian and Other Pacific Islander alone	23	39	0.1%			
Some other race alone	20,182	2,056	55.1%			
Two or more races:	754	409	2.1%			
Two races including Some other race	548	376	1.5%			
Two races excluding Some other race, and three or more races	206	120	0.6%			

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Hispanic or Latino Origin by Race

Pasco city, Washington



Source: B03002. HISPANIC OR LATINO ORIGIN BY RACE

C01001. SEX BY AGE

Data Set: 2011-2013 American Community Survey 3-Year Estimates

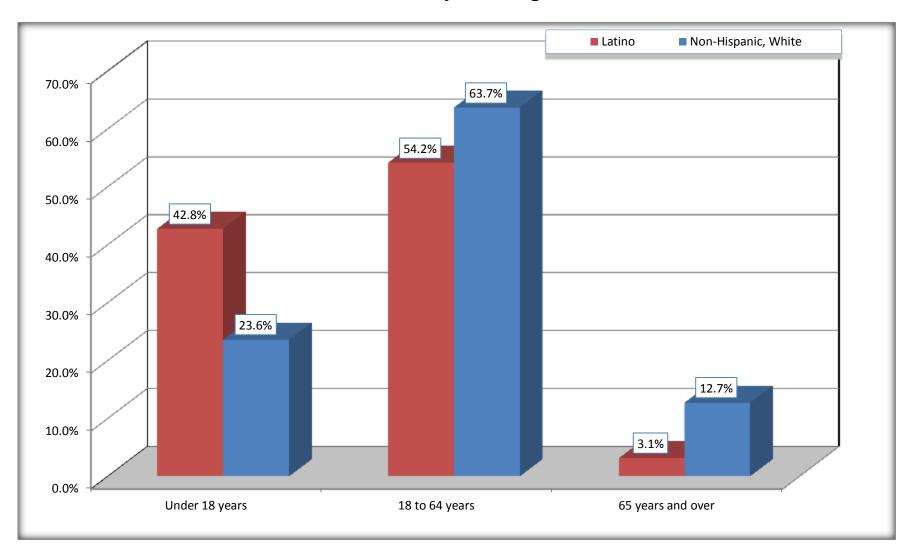
			Pasco city,	Washington		
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	36,625	846	100.0%	25,886	872	100.0%
Under 18 years	15,659	NC	42.8%	6,108	NC	23.6%
18 to 64 years	19,834	NC	54.2%	16,492	NC	63.7%
65 years and over	1,132	NC	3.1%	3,286	NC	12.7%
Male:	18,843	633	51.4%	12,974	530	50.1%
Under 18 years	7,945	403	21.7%	3,080	321	11.9%
18 to 64 years	10,310	497	28.2%	8,371	399	32.3%
65 years and over	588	307	1.6%	1,523	164	5.9%
Female:	17,782	513	48.6%	12,912	508	49.9%
Under 18 years	7,714	424	21.1%	3,028	283	11.7%
18 to 64 years	9,524	305	26.0%	8,121	352	
65 years and over	544	67	1.5%	1,763	144	6.8%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Population by Age

Pasco city, Washington



Source: C01001. SEX BY AGE

B05003. SEX BY AGE BY CITIZENSHIP STATUS

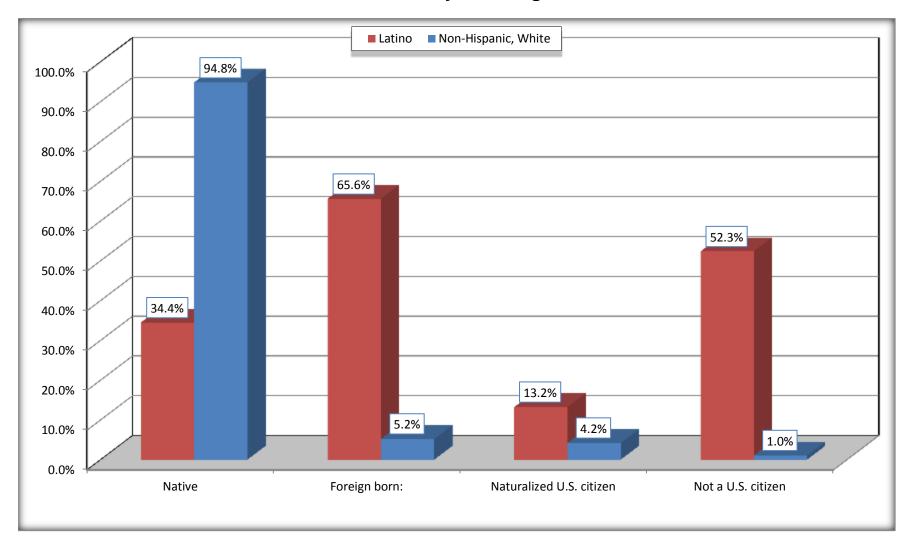
			Pasco city, \	Washington		
	Latino	Margin of Error (+/-)	% of Latino Total by Age	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total by Age
Total:	36,625	846	100.0%	25,886	872	100.0%
Under 18 years:	15,659	NC	100.0%	6,108	NC	100.0%
Native	14,214	NC	90.8%	6,108	NC	100.0%
Foreign born:	1,445	NC	9.2%	0	NC	0.0%
Naturalized U.S. citizen	19	NC	0.1%	0	NC	0.0%
Not a U.S. citizen	1,426	NC	9.1%	0	NC	0.0%
18 years and over:	20,966	NC	100.0%	19,778	NC	100.0%
Native	7,222	NC	34.4%	18,751	NC	94.8%
Foreign born:	13,744	NC	65.6%	1,027	NC	5.2%
Naturalized U.S. citizen	2,769	NC	13.2%	824	NC	4.2%
Not a U.S. citizen	10,975	NC	52.3%	203	NC	1.0%
Male:	18,843	633	51.4%	12,974	530	50.1%
Under 18 years:	7945	403	100.0%	3080	321	100.0%
Native	7,337	541	92.3%	3,080	321	100.0%
Foreign born:	608	394	7.7%	0	113	0.0%
Naturalized U.S. citizen	19	34	0.2%	0	113	0.0%
Not a U.S. citizen	589	401	7.4%	0	113	0.0%
18 years and over:	10,898	444	100.0%	9,894	421	100.0%
Native	3,412	713	31.3%	9,346	567	94.5%
Foreign born:	7,486	698	68.7%	548	495	5.5%
Naturalized U.S. citizen	1,454	489	13.3%	448	495	4.5%
Not a U.S. citizen	6,032	781	55.3%	100	90	1.0%

			Pasco city,	Washington		
	Latino	Margin of Error (+/-)	% of Latino Total by Age	White, Not Hispanic	Margin of Error (+/-)	% of NHW by Age
Female:	17,782	513	48.6%	12,912	508	49.9%
Under 18 years:	7,714	424	100.0%	3,028	283	100.0%
Native	6,877	546	89.1%	3,028	283	100.0%
Foreign born:	837	454	10.9%	0	113	0.0%
Naturalized U.S. citizen	0	113	0.0%	0	113	0.0%
Not a U.S. citizen	837	454	10.9%	0	113	0.0%
18 years and over:	10,068	319	100.0%	9,884	382	100.0%
Native	3,810	577	37.8%	9,405	399	95.2%
Foreign born:	6,258	602	62.2%	479	253	4.8%
Naturalized U.S. citizen	1,315	404	13.1%	376	236	3.8%
Not a U.S. citizen	4,943	566	49.1%	103	74	1.0%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Citizenship Status of Voting Age Population (18 and Over)

Pasco city, Washington



Source: B05003. SEX BY AGE BY CITIZENSHIP STATUS

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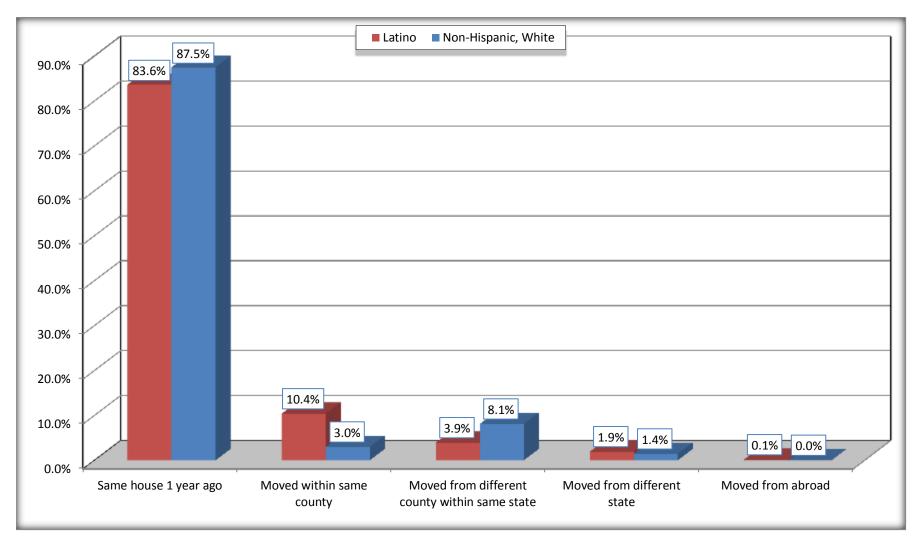
B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe: POPULATION 1 YEAR AND OVER

Data Set: 2011-2013 American Community Survey 3-Year Estimates

			Pasco city, \	Washington		
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	35,759	893	100.0%	25,510	884	100.0%
Same house 1 year ago	29,912	1,748	83.6%	22,325	1,094	87.5%
Moved within same county	3,710	1,321	10.4%	757	508	3.0%
Moved from different county within same state	1,403	681	3.9%	2,067	706	8.1%
Moved from different state	690	598	1.9%	361	233	1.4%
Moved from abroad	44	69	0.1%	0	113	0.0%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Geographical Mobility in the Past Year (Population 1 Year and Over) Pasco city, Washington



Source: B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe: POPULATION 1 YEAR AND OVER

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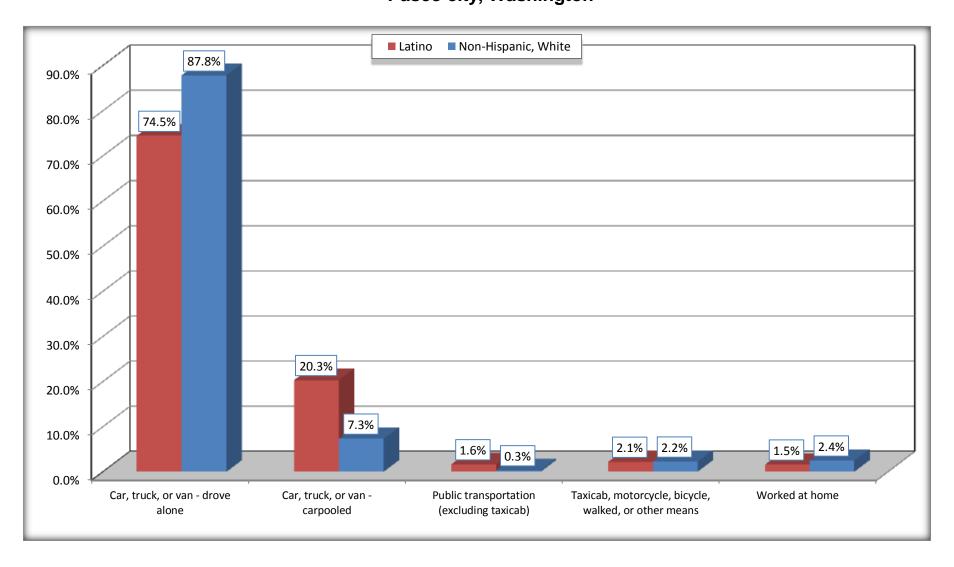
C08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER

Data Set: 2011-2013 American Community Survey 3-Year Estimates

			Pasco city,	Washington			
	Latino	Margin of % of Latino White, Not Error (+/-) Total Hispanic		White, Not Hispanic	Margin of Error (+/-)	% of NHW Total	
Total:	14159	929	100.0%	12359	806	100.0%	
Car, truck, or van - drove alone	10542	954	74.5%	10856	849	87.8%	
Car, truck, or van - carpooled	2871	692	20.3%	900	298	7.3%	
Public transportation (excluding taxicab)	225	177	1.6%	32	51	0.3%	
Taxicab, motorcycle, bicycle, walked, or other means	304	188	2.1%	271	167	2.2%	
Worked at home	217	173	1.5%	300	171	2.4%	

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Means of Transportation to Work (Workers 16 Years and Over) Pasco city, Washington



Source: C08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER

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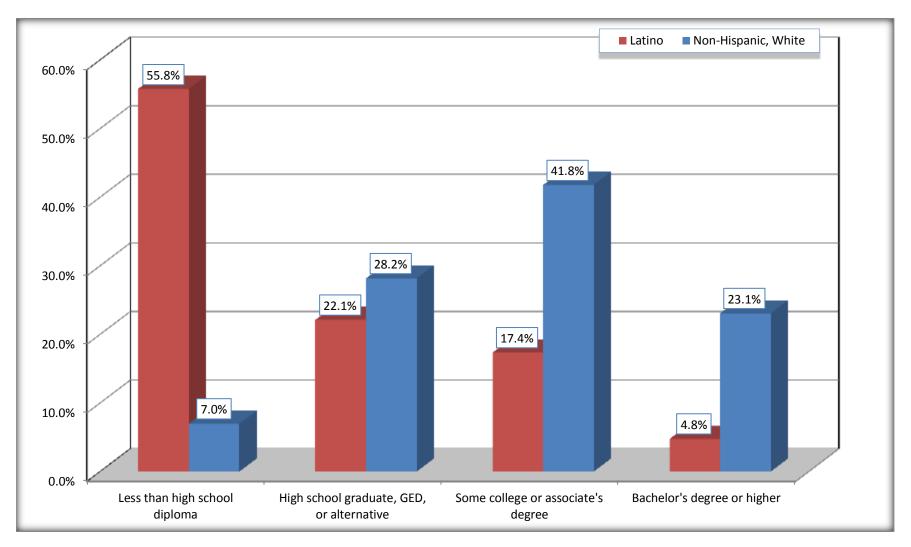
C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER

Data Set: 2011-2013 American Community Survey 3-Year Estimates

			Pasco city,	Washington		
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	16,645	496	100.0%	17,742	584	100.0%
Less than high school diploma	9,285	NC	55.8%	1,234	NC	7.0%
High school graduate, GED, or alternative	3,681	NC	22.1%	4,999	NC	28.2%
Some college or associate's degree	2,888	NC	17.4%	7,414	NC	41.8%
Bachelor's degree or higher	791	NC	4.8%	4,095	NC	23.1%
Male:	8,572	344	51.5%	8,886	410	50.1%
Less than high school diploma	5,227	562	31.4%	698	258	3.9%
High school graduate, GED, or alternative	1,611	499	9.7%	2,514	464	14.2%
Some college or associate's degree	1,273	388	7.6%	3,645	486	20.5%
Bachelor's degree or higher	461	226	2.8%	2,029	433	11.4%
Female:	8,073	292	48.5%	8,856	320	49.9%
Less than high school diploma	4,058	565	24.4%	536	240	3.0%
High school graduate, GED, or alternative	2,070	472	12.4%	2,485	449	14.0%
Some college or associate's degree	1,615	459	9.7%	3,769	522	21.2%
Bachelor's degree or higher	330	177	2.0%	2,066	376	11.6%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Educational Attainment for the Population 25 Years and Older Pasco city, Washington



Source: C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER

B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

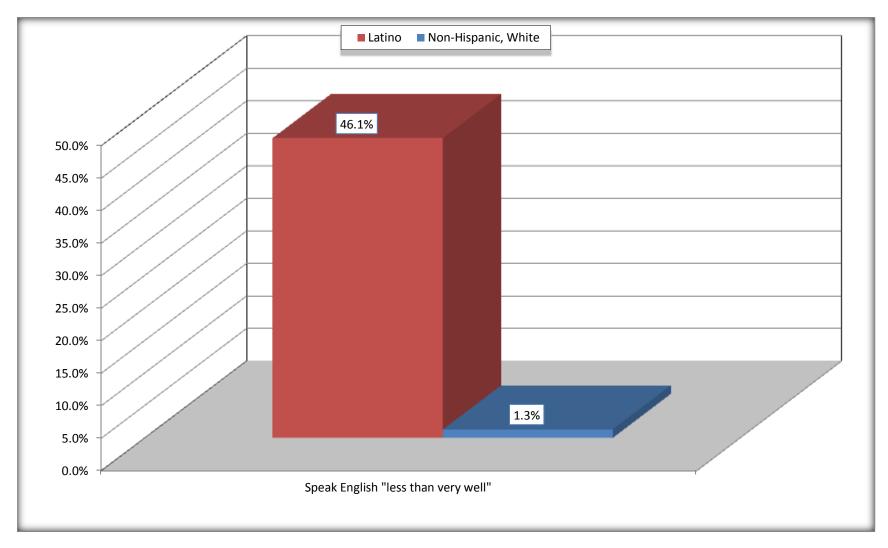
Data Set: 2011-2013 American Community Survey 3-Year Estimates

			Pasco city,	Washington		
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	31,940	746	100.0%	23,793	819	100.0%
Speak only English	3,543	NC	11.1%	22,309	NC	93.8%
Speak another language	28,397	NC	88.9%	1,484	NC	6.2%
Speak English "very well"	13,658	NC	42.8%	1,186	NC	5.0%
Speak English "less than very well"	14,739	NC	46.1%	298	NC	1.3%
Native:	16,800	1,307	52.6%	22,766	945	95.7%
Speak only English	2,985	721	9.3%	22,013	976	92.5%
Speak another language	13,815	1,370	43.3%	753	305	3.2%
Speak English "very well"	9,942	1,224	31.1%	607	288	2.6%
Speak English "less than very well"	3,873	930	12.1%	146	98	0.6%
Foreign born:	15,140	1,305	47.4%	1,027	683	4.3%
Speak only English	558	291	1.7%	296	155	1.2%
Speak another language	14,582	1,328	45.7%	731	623	3.1%
Speak English "very well"	3,716	894	11.6%	579	625	2.4%
Speak English "less than very well"	10,866	1,086	34.0%	152	124	0.6%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology. http://www.census.gov/acs/www/UseData/index.htm

Speak English "Less than Very Well" (Population 5 Years and Over) Pasco city, Washington



Source: B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER Data Set: 2011-2013 American Community Survey 3-Year Estimates

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C17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

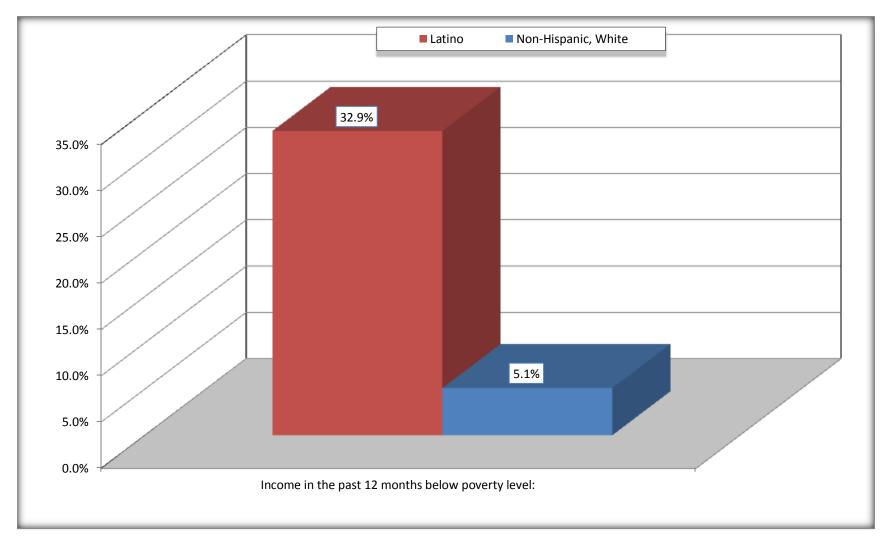
Data Set: 2011-2013 American Community Survey 3-Year Estimates

			Pasco city, \	Washington		
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	6,547	429	100.0%	6,849	495	100.0%
Income in the past 12 months below poverty level:	2,155	435	32.9%	351	170	5.1%
Married-couple family:	1,013	376	15.5%	195	135	2.8%
With related children under 18 years	882	368	13.5%	39	66	0.6%
Other family:	1,142	313	17.4%	156	98	2.3%
Male householder, no wife present	200	145	3.1%	37	48	0.5%
With related children under 18 years	200	145	3.1%	25	44	0.4%
Female householder, no husband present	942	284	14.4%	119	78	1.7%
With related children under 18 years	897	287	13.7%	119	78	1.7%
Income in the past 12 months at or above poverty level:	4,392	559	67.1%	6,498	493	94.9%
Married-couple family:	3,116	477	47.6%	5,065	518	74.0%
With related children under 18 years	2,308	503	35.3%	2,312	372	33.8%
Other family:	1,276	348	19.5%	1,433	354	20.9%
Male householder, no wife present	482	193	7.4%	555	267	8.1%
With related children under 18 years	413	193	6.3%	308	188	4.5%
Female householder, no husband present	794	293	12.1%	878	286	12.8%
With related children under 18 years	703	274	10.7%	395	222	5.8%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology. http://www.census.gov/acs/www/UseData/index.htm

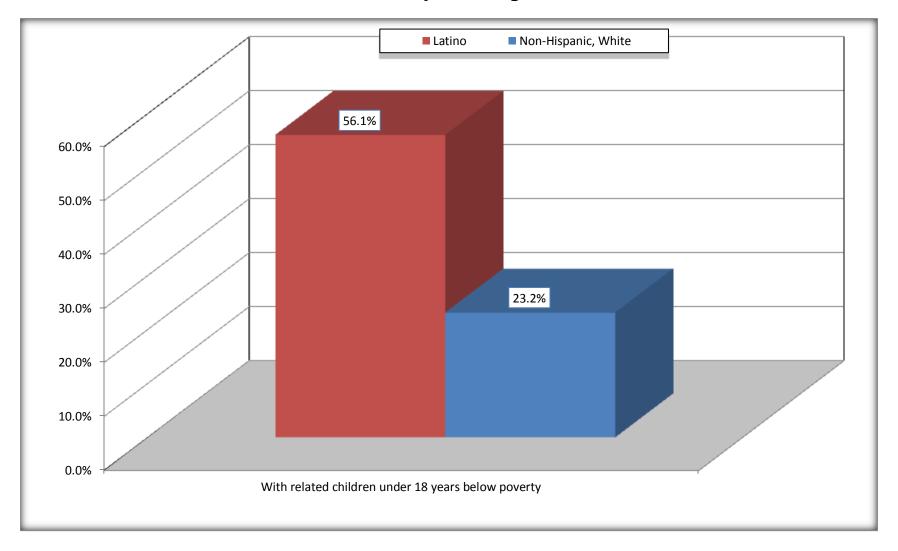
Family Households Below Poverty in the Past 12 Months Pasco city, Washington



Source: C17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18

YEARS

Female-headed Households with Related Children Below Poverty in the Past 12 Months Pasco city, Washington



Source: C17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18

YEARS

B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM POVERTY STATUS IS DETERMINED

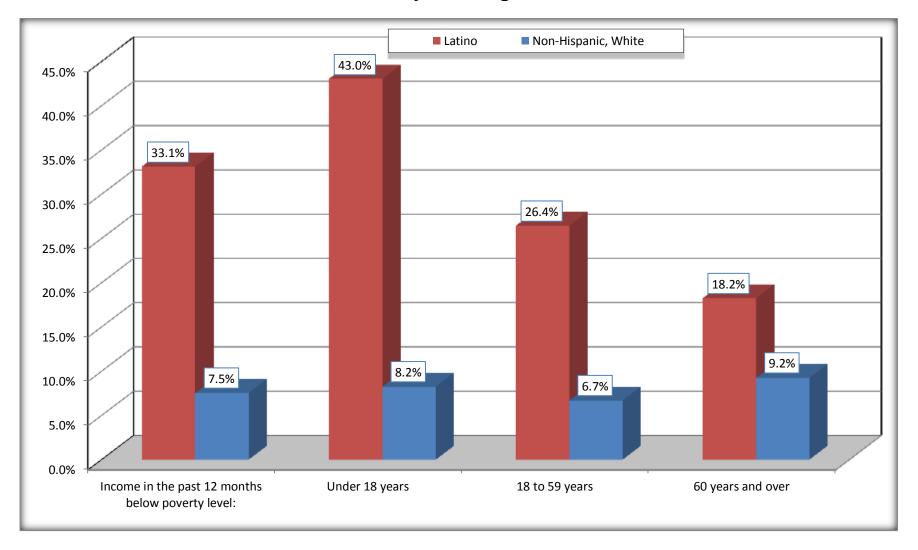
Data Set: 2011-2013 American Community Survey 3-Year Estimates

			Pasco city,	Washington		
	Latino	Margin of Error (+/-)	% of Latino By Age	White, Not Hispanic	Margin of Error (+/-)	% of NHW By Age
Total:	36,391	841	100.0%	25,441	839	100.0%
Income in the past 12 months below poverty level:	12,049	2,153	33.1%	1,914	589	7.5%
Under 18 years	6,660	NC	43.0%	488	NC	8.2%
18 to 59 years	5,082	1,014	26.4%	983	329	6.7%
60 years and over	307	NC	18.2%	443	NC	9.2%
Income in the past 12 months at or above poverty level:	24,342	2,668	66.9%	23,527	962	92.5%
Under 18 years	8,821	1,534	57.0%	5,433	NC	91.8%
18 to 59 years	14,144	1,227	73.6%	13,742	682	93.3%
60 years and over	1,377	NC	81.8%	4,352	NC	90.8%

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Population Below Poverty in the Past 12 Months

Pasco city, Washington



Source: B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM POVERTY STATUS IS DETERMINED Data Set: 2011-2013 American Community Survey 3-Year Estimates

B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)

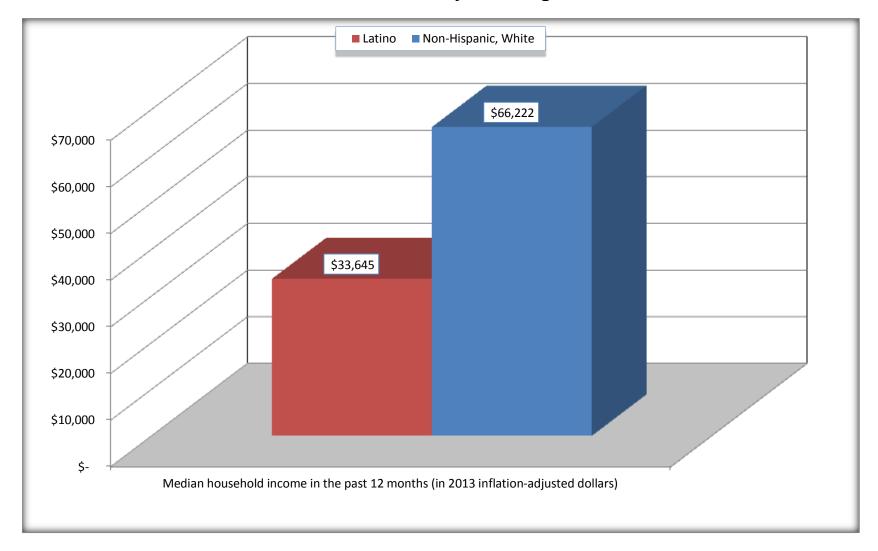
Data Set: 2011-2013 American Community Survey 3-Year Estimates

		Pasco city, Washington						
	L	_atino	•	gin of (+/-)		e, Not panic	Margin of Error (+/-)	
Median household income in the past 12 months (in 2013 inflation-adjusted dollars)	\$	33,645	\$	5,319	\$	66,222	\$	3,614

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Median Household Income in the Past 12 Months

Pasco city, Washington



Source: B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS) Data Set: 2011-2013 American Community Survey 3-Year Estimates

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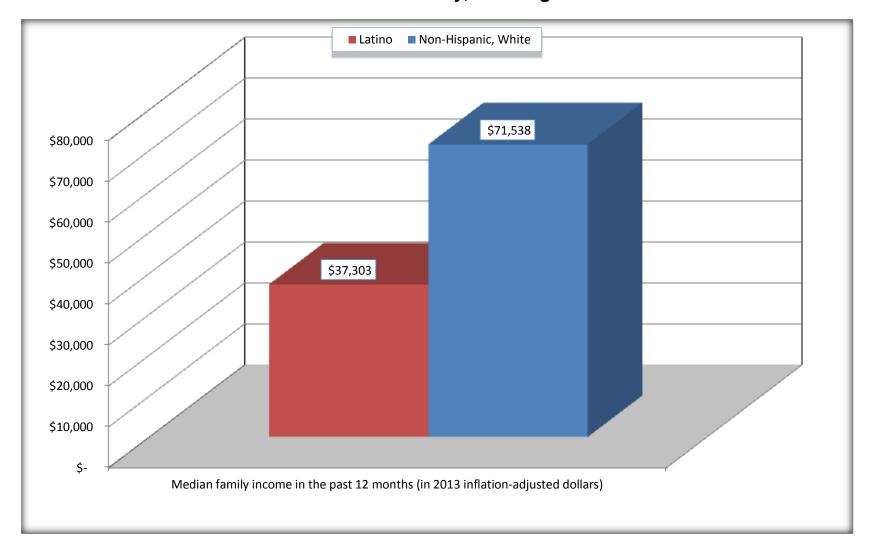
B19113. MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)

Data Set: 2011-2013 American Community Survey 3-Year Estimates

		Pasco city, Washington							
	L	Latino		Margin of Error (+/-)		White, Not Hispanic		Margin of Error (+/-)	
Median family income in the past 12 months (in 2013 inflation-adjusted dollars)	\$	37,303	\$	5,413	\$	71,538	\$	6,592	

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Median Family Income in the Past 12 Months Pasco city, Washington



Source: B19113. MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)

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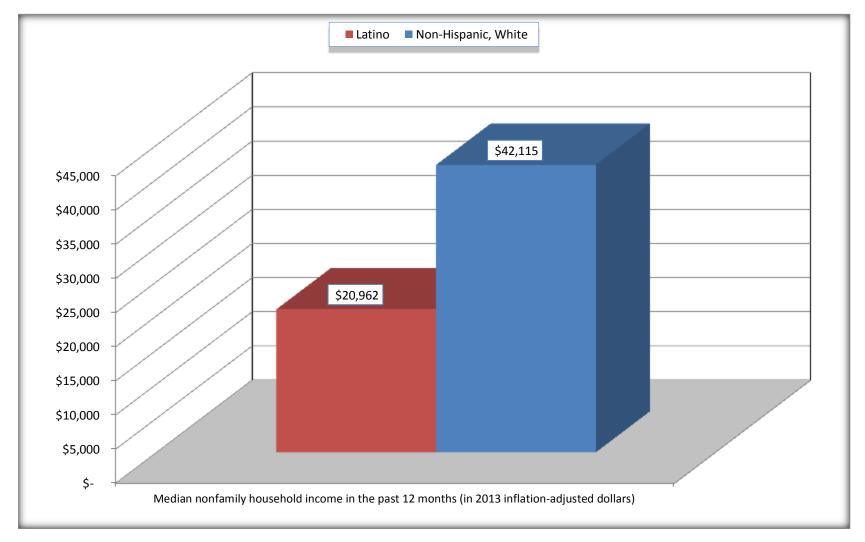
B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS) Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Pasco city, Washington							
	Latino Margin of White, Not Error (+/-) Hispanic				Margin of Error (+/-)			
Median nonfamily household income in the past 12 months (in 2013								
inflation-adjusted dollars)	\$	20,962	\$	5,913	\$	42,115	\$	18,829

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Median Non-Family Income in the Past 12 Months

Pasco city, Washington



Source: B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS) Data Set: 2011-2013 American Community Survey 3-Year Estimates

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B19301. PER CAPITA INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)

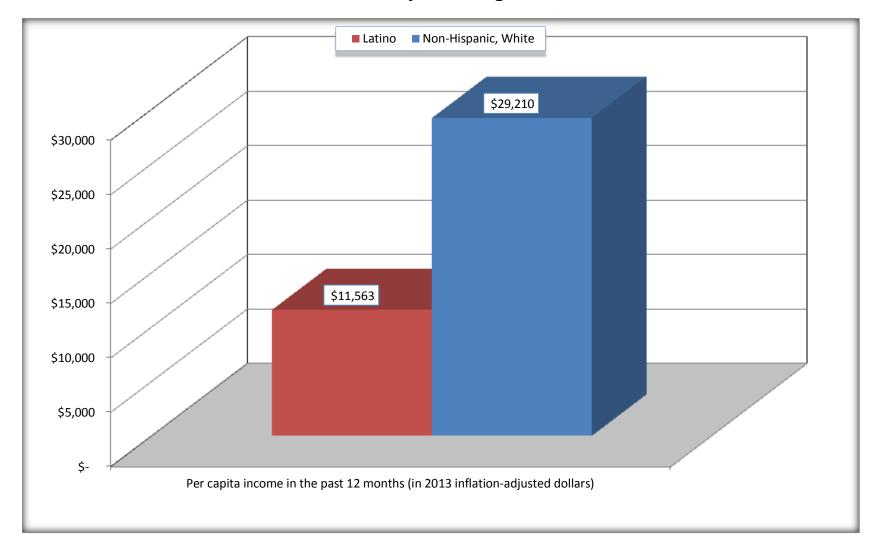
Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Pasco city, Washington						
	Latino	Marg Error			nite, Not spanic		gin of r (+/-)
Per capita income in the past 12 months (in 2013 inflation-adjusted dollars)	\$ 11,56	3 \$	950	\$	29,210	\$	1,574

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Per capita Income in the Past 12 Months

Pasco city, Washington



Source: B19301. PER CAPITA INCOME IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS)

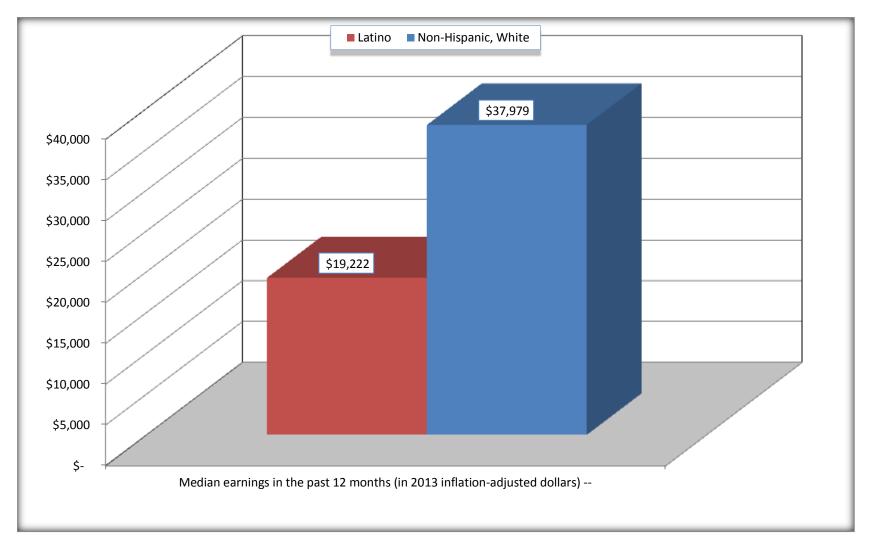
B20017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS FOR THE POPULATION 16 YEARS AND OVER WITH EARNINGS IN THE PAST 12 MONTHS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

		Pasco city, Washington								
	l	_atino		rgin of or (+/-)		nite, Not ispanic		argin of or (+/-)		
Median earnings in the past 12 months (in 2013 inflation-adjusted dollars)										
Total:	\$	19,222	\$	1,361	\$	37,979	\$	3,369		
Male										
Total	\$	21,030	\$	1,652	\$	50,969	\$	2,167		
Worked full-time, year-round in the past 12 months	\$	27,997	\$	2,018	\$	57,090	\$	5,434		
Other	\$	11,804	\$	1,631	\$	11,985	\$	5,351		
Female										
Total	\$	16,006	\$	1,770	\$	29,487	\$	3,832		
Worked full-time, year-round in the past 12 months	\$	22,236	\$	2,686	\$	38,608	\$	3,396		
Other	\$	9,430	\$	2,546	\$	12,279	\$	2,464		

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Median earnings in the Past 12 Months (16 Years and Over with Earnings) Pasco city, Washington



Source: B20017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2013 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS FOR THE POPULATION 16 YEARS AND OVER WITH EARNINGS IN THE PAST 12 MONTHS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

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C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS AND OVER

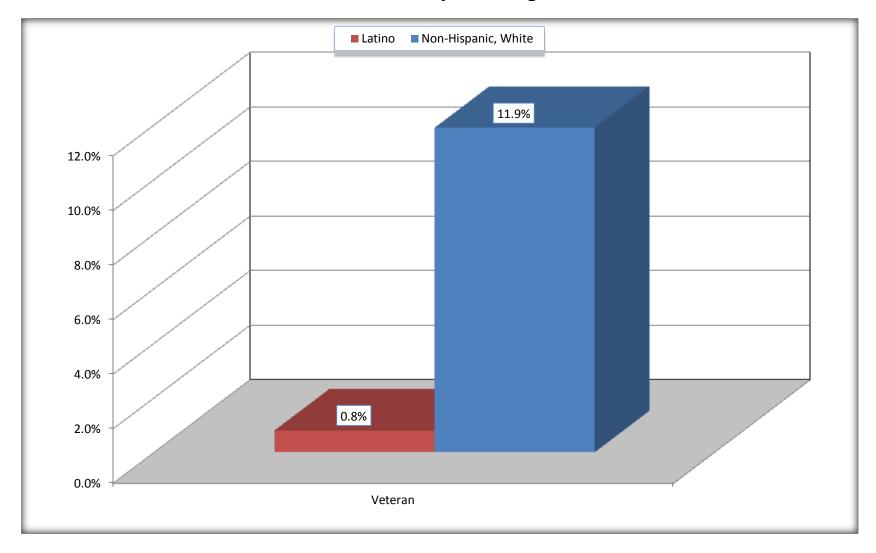
Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Pasco city, Washington									
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total				
Total:	20,936	602	100.0%	19,739	631	100.0%				
Veteran	160	NC	0.8%	2,346	NC	11.9%				
Nonveteran	20,776	NC	99.2%	17,393	NC	88.1%				
Male:	10,868	446	51.9%	9,855	427	49.9%				
18 to 64 years:	10,280	504	49.1%	8,332	404	42.2%				
Veteran	160	132	0.8%	1,218	291	6.2%				
Nonveteran	10,120	497	48.3%	7,114	479	36.0%				
65 years and over:	588	307	2.8%	1,523	164	7.7%				
Veteran	0	113	0.0%	881	165	4.5%				
Nonveteran	588	307	2.8%	642	192	3.3%				
Female:	10,068	319	48.1%	9,884	382	50.1%				
18 to 64 years:	9,524	305	45.5%	8,121	352	41.1%				
Veteran	0	113	0.0%	208	181	1.1%				
Nonveteran	9,524	305	45.5%	7,913	397	40.1%				
65 years and over:	544	67	2.6%	1,763	144	8.9%				
Veteran	0	113	0.0%	39	37	0.2%				
Nonveteran	544	67	2.6%	1,724	144	8.7%				

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Veterans in the Civilian Population 18 Years and Over

Pasco city, Washington



Source: C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS AND OVER

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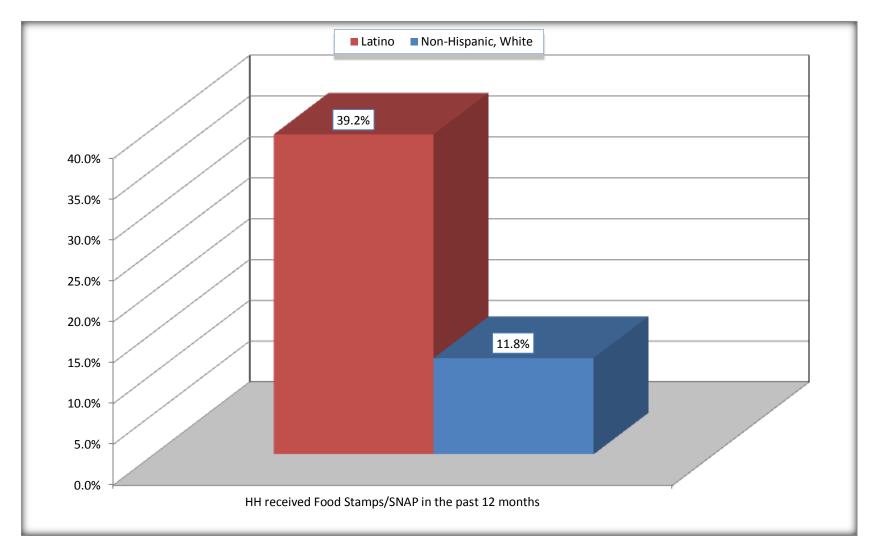
B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER

Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Pasco city, Washington									
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total				
Total:	8,258	437	100.0%	9,751	485	100.0%				
HH received Food Stamps/SNAP in the past 12 months	3,238	562	39.2%	1,151	339	11.8%				
HH did not receive Food Stamps/SNAP in the past 12 months	5,020	523	60.8%	8,600	521	88.2%				

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Receipt of Food Stamps/SNAP in the Past 12 Months by Household Pasco city, Washington



Source: B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER

C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER

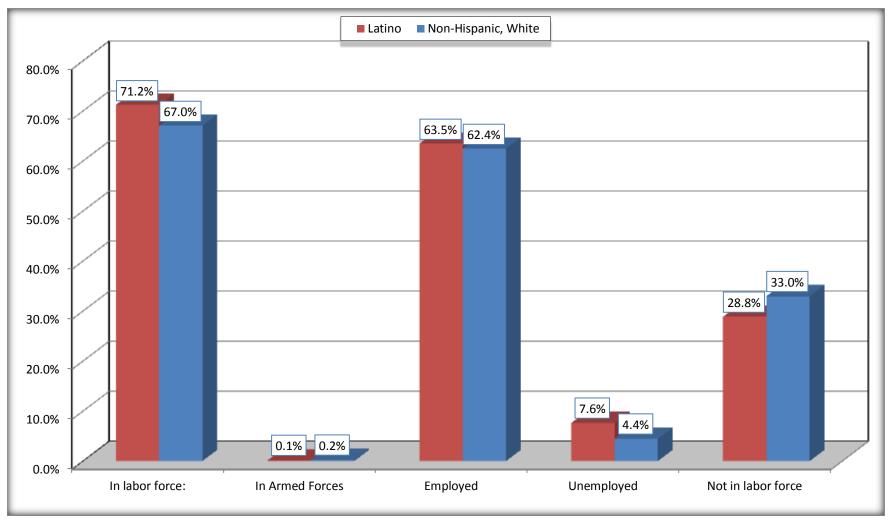
		Pasco city, Washington									
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total					
Total:	22,521	661	100.0%	20,116	665	100.0%					
In labor force:	16,030	NC	71.2%	13,487	NC	67.0%					
In Armed Forces	30	NC	0.1%	39	NC	0.2%					
Civilian:	15,725	NC	69.8%	13,125	NC	65.2%					
Employed	14,290	NC	63.5%	12,560	NC	62.4%					
Unemployed	1,710	NC	7.6%	888	NC	4.4%					
Not in labor force	6,491	NC	28.8%	6,629	NC	33.0%					
Male:	11,584	483	51.4%	10,075	449	50.1%					
16 to 64 years:	10,996	548	48.8%	8,552	420	42.5%					
In labor force:	8,906	656	39.5%	7,239	474	36.0%					
In Armed Forces	30	49	0.1%	39	47	0.2%					
Civilian:	8,876	656	39.4%	7,200	479	35.8%					
Employed	8113	664	36.0%	6773	481	33.7%					
Unemployed	763	273	3.4%	427	213	2.1%					
Not in labor force	2,090	518	9.3%	1,313	385	6.5%					
65 years and over:	588	307	2.6%	1,523	164	7.6%					
In labor force:	135	159	0.6%	172	74	0.9%					
Employed	135	159	0.6%	172	74	0.9%					
Unemployed	0	113	0.0%	0	113	0.0%					
Not in labor force	453	316	2.0%	1,351	165	6.7%					

	Pasco city, Washington									
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total				
Female:	10,937	378	48.6%	10,041	415	49.9%				
16 to 64 years:	10,393	369	46.1%	8,278	386	41.2%				
In labor force:	6,849	581	30.4%	5,925	513	29.5%				
In Armed Forces	0	113	0.0%	0	113	0.0%				
Civilian:	6,849	581	30.4%	5,925	513	29.5%				
Employed	5,902	657	26.2%	5,464	556	27.2%				
Unemployed	947	362	4.2%	461	265	2.3%				
Not in labor force	3,544	574	15.7%	2,353	413	11.7%				
65 years and over:	544	67	2.4%	1,763	144	8.8%				
In labor force:	140	134	0.6%	151	107	0.8%				
Employed	140	134	0.6%	151	107	0.8%				
Unemployed	0	113	0.0%	0	113	0.0%				
Not in labor force	404	151	1.8%	1,612	145	8.0%				

Source: U.S. Census Bureau, 2011-2013 American Community Survey

Employment Status for the Population 16 years and over

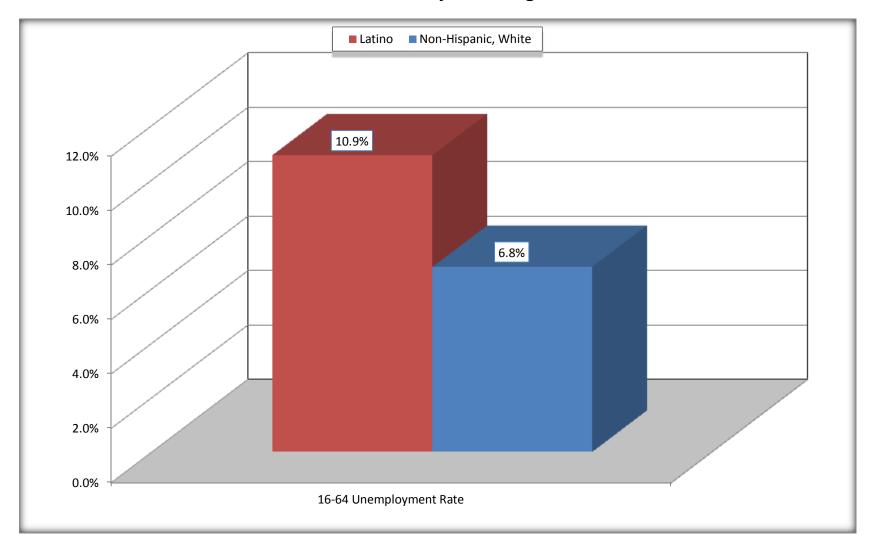
Pasco city, Washington



Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER

Unemployment of Working Age Population (Ages 16 to 64) (As a Percent of 16-64 Civilian Labor Force)

Pasco city, Washington



Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER Data Set: 2011-2013 American Community Survey 3-Year Estimates

C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER

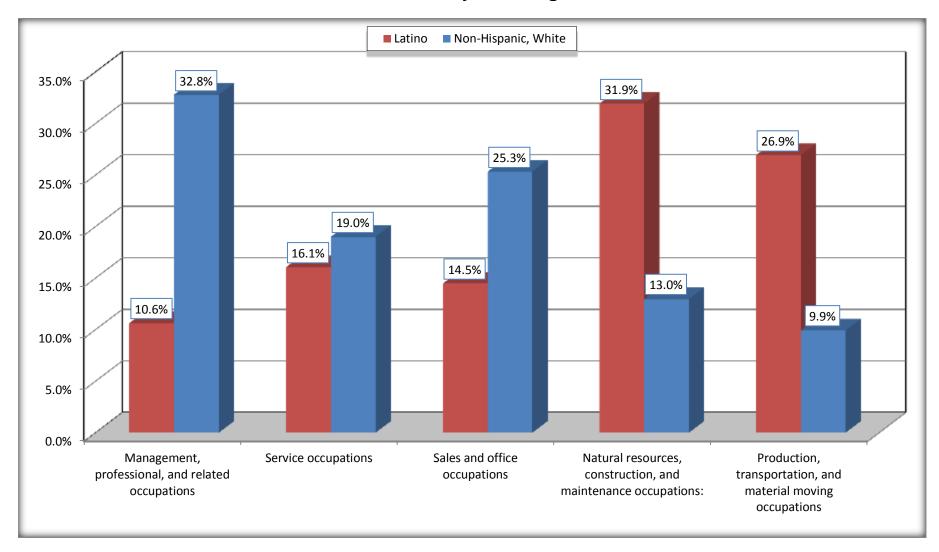
Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Pasco city, Washington							
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total		
Total:	14,290	948	100.0%	12,560	783	100.0%		
Management, professional, and related occupations	1,518	NC	10.6%	4,118	NC	32.8%		
Service occupations	2,294	NC	16.1%	2,386	NC	19.0%		
Sales and office occupations	2,067	NC	14.5%	3,181	NC	25.3%		
Natural resources, construction, and maintenance occupations:	4,563	NC	31.9%	1,629	NC	13.0%		
Production, transportation, and material moving occupations	3,848	NC	26.9%	1,246	NC	9.9%		
Male:	8,248	644	57.7%	6,945	493	55.3%		
Management, business, science, and arts occupations:	547	272	3.8%	2,095	376	16.7%		
Service occupations	913	366	6.4%	827	342	6.6%		
Sales and office occupations	932	369	6.5%	1,312	334	10.4%		
Natural resources, construction, and maintenance occupations:	3,236	735	22.6%	1,555	363	12.4%		
Production, transportation, and material moving occupations	2,620	556	18.3%	1,156	406	9.2%		
Female:	6,042	675	42.3%	5,615	562	44.7%		
Management, professional, and related occupations	971	276	6.8%	2,023	376	16.1%		
Service occupations	1,381	424	9.7%	1,559	407	12.4%		
Sales and office occupations	1,135	352	7.9%	1,869	465	14.9%		
Natural resources, construction, and maintenance occupations:	1,327	321	9.3%	74	79	0.6%		
Production, transportation, and material moving occupations	1,228	408	8.6%	90	69	0.7%		

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology. http://www.census.gov/acs/www/UseData/index.htm

Occupation for the Civilian Employed 16 Years and Over Population Pasco city, Washington



Source: C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER

B25003. TENURE - Universe: OCCUPIED HOUSING UNITS

Data Set: 2011-2013 American Community Survey 3-Year Estimates

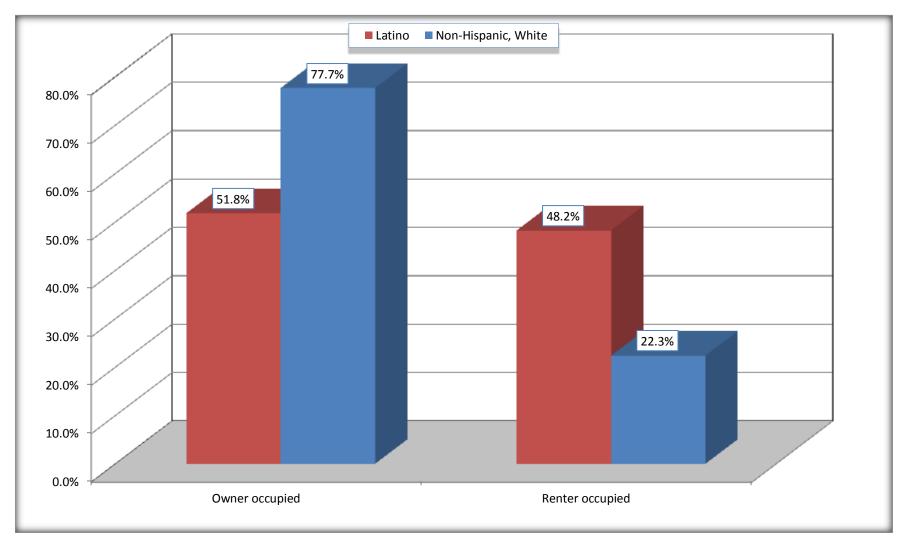
	Pasco city, Washington									
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total				
Total:	8,258	437	100.0%	9,751	485	100.0%				
Owner occupied	4,276	415	51.8%	7,572	522	77.7%				
Renter occupied	3,982	593	48.2%	2,179	390	22.3%				

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology. http://www.census.gov/acs/www/UseData/index.h

Home Owners and Renters by Household

Pasco city, Washington



Source: B25003. TENURE - Universe: OCCUPIED HOUSING UNITS Data Set: 2011-2013 American Community Survey 3-Year Estimates

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B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS

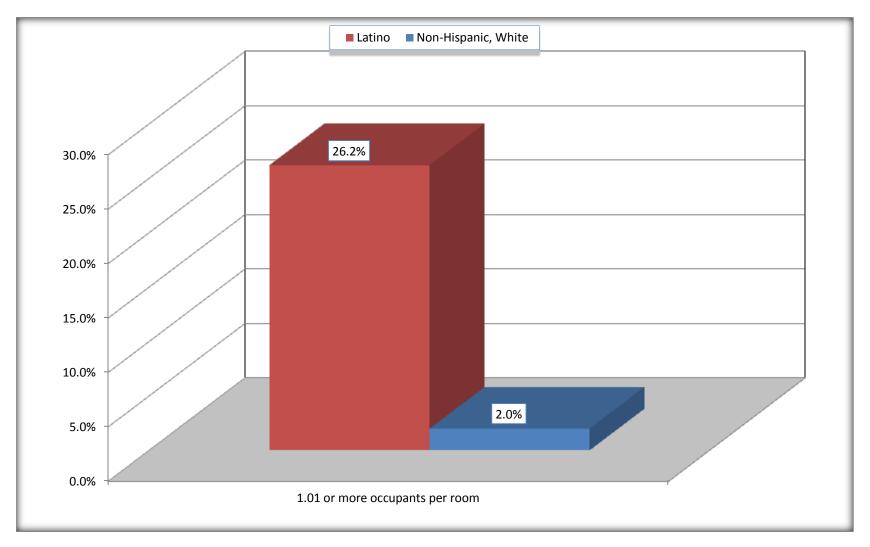
Data Set: 2011-2013 American Community Survey 3-Year Estimates

	Pasco city, Washington									
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total				
Total:	8,258	437	100.0%	9,751	485	100.0%				
1.00 or less occupants per room	6,097	601	73.8%	9,558	488	98.0%				
1.01 or more occupants per room	2,161	447	26.2%	193	112	2.0%				

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology. http://www.census.gov/acs/www/UseData/index.ht

More than One Person per Room (Crowding) by Household Pasco city, Washington



Source: B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS

B18101: AGE BY DISABILITY STATUS ECF No. 24 filed 10/15/16 PageID.313 Page 81 of 93

Data Set: 2011-2013 American Community Survey 3-Year Estimates

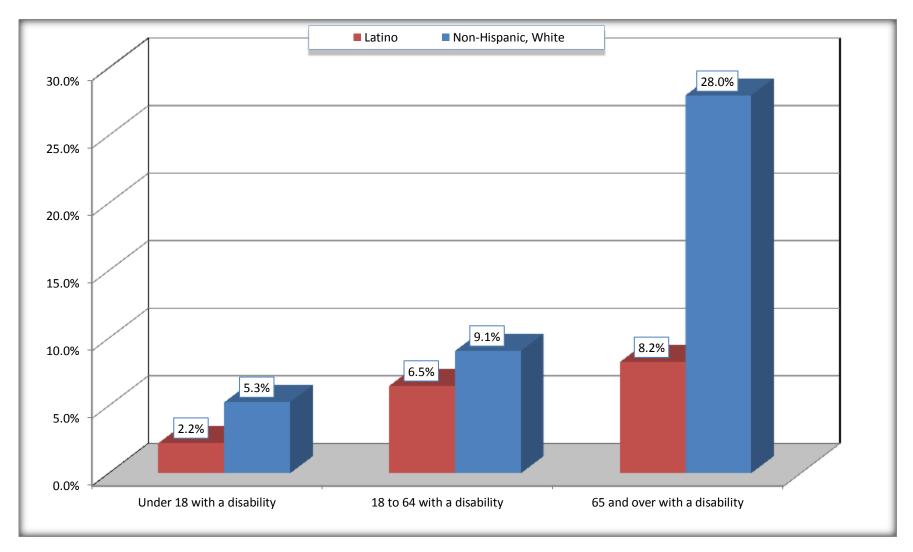
	Pasco city, Washington								
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total			
Total:	36,539	843	100.0%	25,589	869	100.0%			
Under 18 years:	15,659	530	42.9%	6,108	468	23.9%			
With a disability	348	229	1.0%	321	191	1.3%			
No disability	15,311	587	41.9%	5,787	495	22.6%			
18 to 64 years:	19,748	662	54.0%	16,288	574	63.7%			
With a disability	1,276	383	3.5%	1,475	332	5.8%			
No disability	18,472	744	50.6%	14,813	611	57.9%			
65 years and over:	1,132	337	3.1%	3,193	228	12.5%			
With a disability	93	95	0.3%	893	223	3.5%			
No disability	1,039	382	2.8%	2,300	232	9.0%			

Source: U.S. Census Bureau, 2011-2013 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology. http://www.census.gov/acs/www/UseData/index.htm

Disability by Age

Pasco city, Washington



Source: B18101: AGE BY DISABILITY STATUS

C27001: HEALTH INSURANCE COVERAGE STATUS BY AGE No. 24 filed 10/15/16 PageID.315 Page 83 of 93

Data Set: 2011-2013 American Community Survey 3-Year Estimates

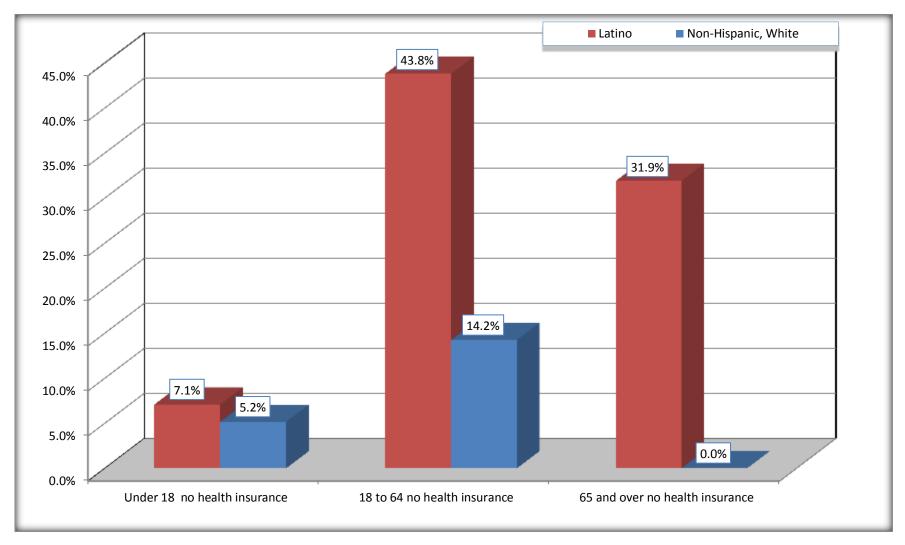
		Pasco city, Washington								
	Latino	Margin of Error (+/-)	% of Latino Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total				
Total:	36,539	843	100.0%	25,589	869	100.0%				
Under 18 years:	15,659	530	42.9%	6,108	468	23.9%				
With health insurance coverage	14,551	787	39.8%	5,793	467	22.6%				
No health insurance coverage	1,108	597	3.0%	315	301	1.2%				
18 to 64 years:	19,748	662	54.0%	16,288	574	63.7%				
With health insurance coverage	11,100	1,080	30.4%	13,968	690	54.6%				
No health insurance coverage	8,648	1,044	23.7%	2,320	556	9.1%				
65 years and over:	1,132	337	3.1%	3,193	228	12.5%				
With health insurance coverage	771	360	2.1%	3,193	228	12.5%				
No health insurance coverage	361	289	1.0%	0	113	0.0%				

Source: U.S. Census Bureau, 2011-2013 American Community Survey

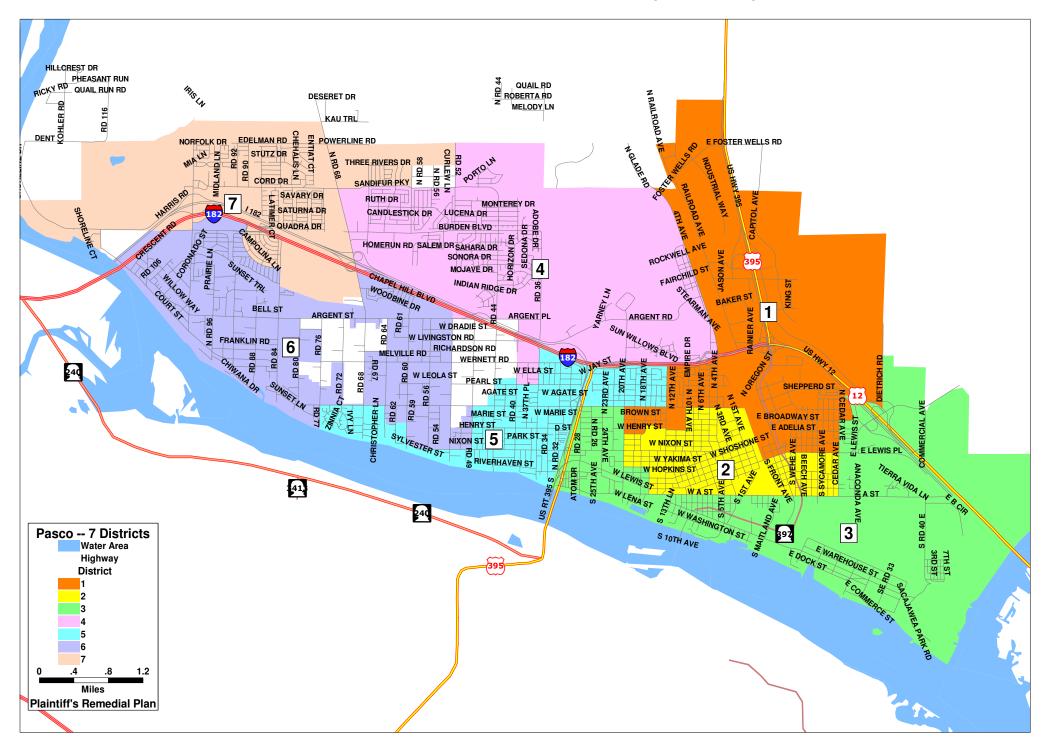
For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology. http://www.census.gov/acs/www/UseData/index.htm

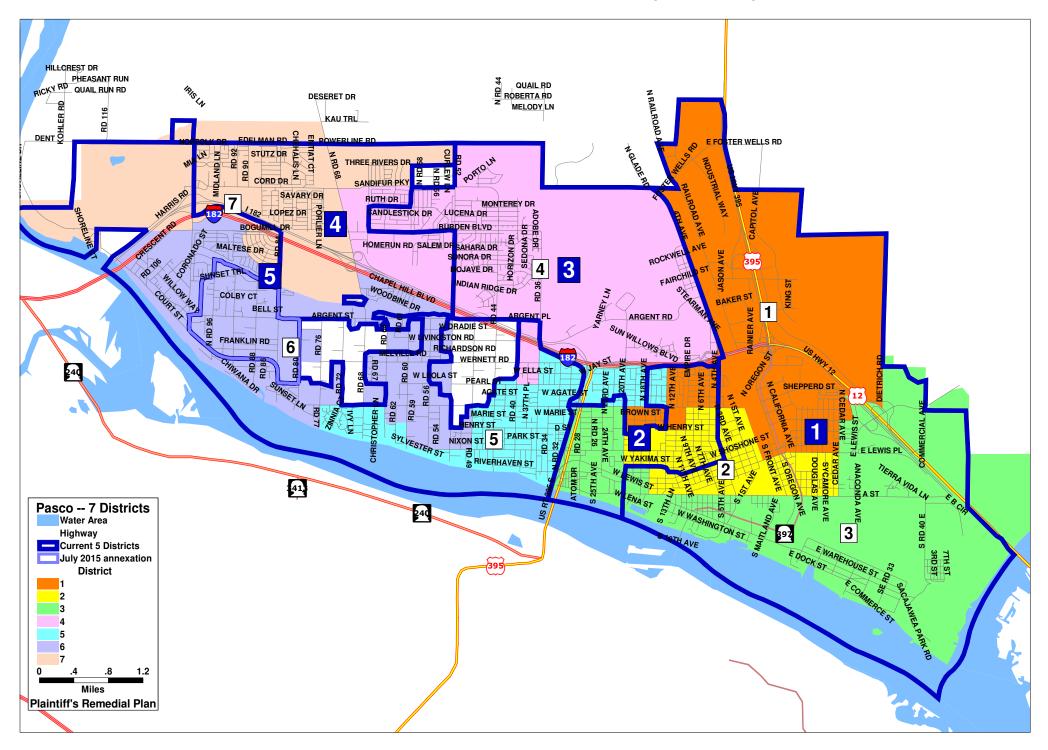
Lack of Health Insurance Coverage by Age

Pasco city, Washington



Source: C27001: HEALTH INSURANCE COVERAGE STATUS BY AGE Data Set: 2011-2013 American Community Survey 3-Year Estimates





Population Summary Report

Pasco City Council -- Plaintiff's Remedial Plan -- 7 districts

District	Population	Deviation	% Deviation	Latino	% Latino	NH White	% NH White	% Latino of all citizens
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1	8724	-198	-2.22%	7292	83.59%	1074	12.31%	74.86%
2	8865	-57	-0.64%	7289	82.22%	1214	13.69%	72.78%
3	8587	-335	-3.75%	7161	83.39%	1195	13.92%	69.99%
4	9026	104	1.17%	2495	27.64%	5936	65.77%	30.88%
5	8980	58	0.65%	4697	52.31%	3816	42.49%	46.11%
6	9102	180	2.02%	2175	23.90%	6291	69.12%	19.85%
7	9168	246	2.76%	2626	28.64%	5731	62.51%	31.05%
Total	62452	<u>!</u>		33735	54.02%	25257	40.44%	45.02%

Ideal district size = 8,922

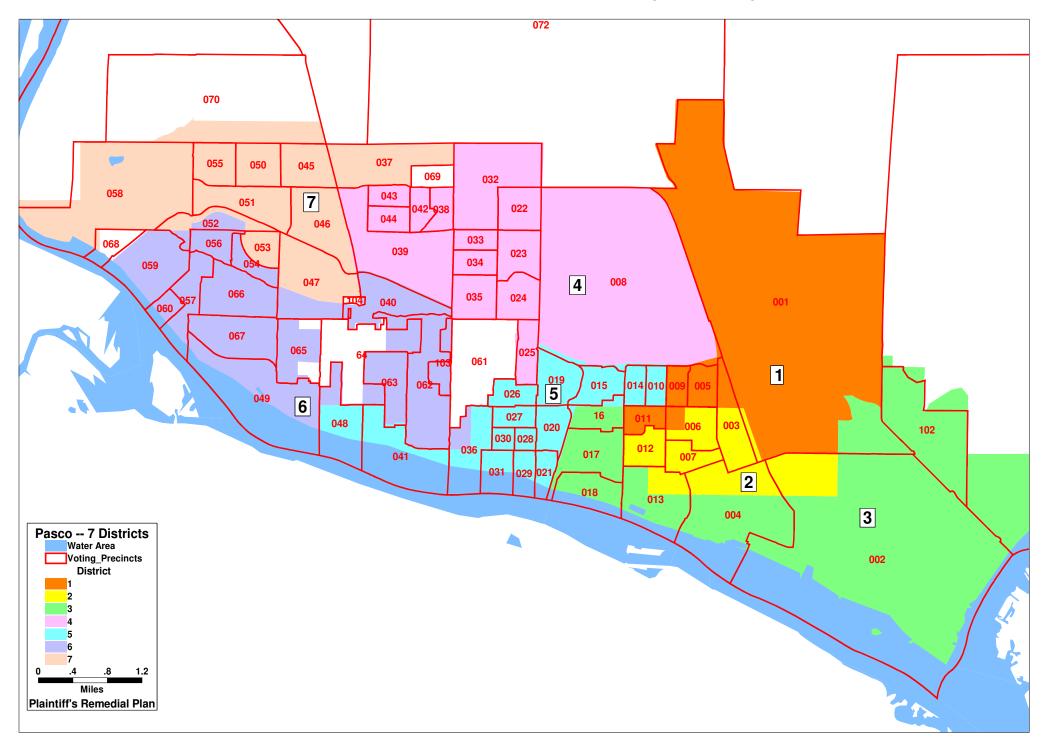
Total Deviation 6.51%

District	18+_Pop	18+ Latino	% 18+ Latino 18	+ NH White	% 18+ NH White	% Latino CVAP	% Latino of Registered Voters
1	5165	4062	78.64%	859	16.63%	54.78%	65.76%
2	5596	4301	76.86%	1013	18.10%	56.29%	65.33%
3	5187	4031	77.71%	995	19.18%	54.08%	61.73%
4	6090	1403	23.04%	4318	70.90%	27.37%	19.25%
5	6108	2661	43.57%	3091	50.61%	28.98%	27.25%
6	6365	1242	19.51%	4703	73.89%	14.24%	15.45%
7	6047	1483	24.52%	4043	66.86%	24.04%	20.36%
Total	40558	19183	47.30%	19022	46.90%	32.02%	29.81%

Note:

^{(1)%} LCVAP calculated by disaggregating 2010-2014 ACS block group estimates for 18+ citizen Hispanics and Non-Hispanics to 2010 census blocks.

⁽³⁾ Surname match of registered voters as of Nov. 30, 2015



CERTIFICATE OF SERVICE 1 I hereby certify that on October 15, 2016, I caused the foregoing document to be: 2 Xelectronically filed with the Clerk of the Court using the CM/ECF system 3 which will send notification of such filing to the following: 4 **Emily Chiang** echiang@aclu-wa.org brendan.monahan@stokeslaw.com Brendan V. Monahan 5 caragon@yarmuth.com Cristin Kent Aragon **Gregory Landis** glandis@yarmuth.com 6 Leland Barrett Kerr Īkerr@kerrlawgroup.net John A. Safarli jsafarli@floyd-ringer.com 7 8 /s/La Rond Baker La Rond Baker, WSBA No. 43610 9 lbaker@aclu-wa.org 10 AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON FOUNDATION 11 901 Fifth Avenue, Suite 630 Seattle, Washington 98164 12 Telephone: (206) 624-2184 13 14 15 16 17 18 19 20 21 22 23

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