

Domingo Garcia

LULAC National President

January 20, 2022

Hearing: Voter Suppression and Continuing Threats to Democracy.

LULAC Plaintiffs assert that the redistricting plans enacted by the 87th Texas Legislature for the Texas House of Representatives (“Texas House”), Texas Senate, Texas State Board of Education (“SBOE”) and Congress violate the United States Constitution and the Voting Rights Act of 1965.

Regarding the newly enacted Texas House plan, LULAC Plaintiffs contend that Defendants failed to create an additional Latino citizen voting age majority district in (1) Harris County, (2) the geographic area including portions of Caldwell, Hays and Travis counties and (3) the geographic area including portions of Ector and Midland counties. LULAC Plaintiffs also assert that Defendants purposefully manipulated district boundaries to weaken Latino voting strength, such that Latinos lack the ability to elect their preferred candidates in House Districts 31, 37 and 118. Additionally, LULAC Plaintiffs allege that Defendants systematically and deliberately malapportioned districts in West Texas to favor voters of certain regions at the expense of voters in other regions, and to favor Anglo voters at the expense of Latino voters.

Regarding the newly enacted Texas Senate plan, LULAC Plaintiffs contend that Defendants failed to create additional Latino citizen voting age majority districts in (1) the geographic area including portions of Dallas and Tarrant counties and (2) the geographic area including portions of Bexar, Hays, Caldwell, Guadalupe, Comal and Travis counties. LULAC Plaintiffs also assert that Defendants manipulated district boundaries in Senate District 27 with the purpose of reducing Latino voting strength and making it more difficult for Latinos to elect their preferred candidates.

Regarding the newly enacted Texas SBOE plan, LULAC Plaintiffs contend that Defendants failed to create an additional Latino citizen voting age majority district in Harris County. LULAC Plaintiffs also assert that Defendants manipulated the district boundaries of

SBOE District 3 with the purpose of reducing Latino voting strength and making it more difficult for Latinos to elect their preferred candidates. Additionally, LULAC Plaintiffs allege that Defendants manipulated district boundaries in South Texas to limit Latino electoral opportunity in SBOE Districts 2 and 3.

Regarding the newly enacted congressional plan, LULAC Plaintiffs contend that Defendants failed to create additional Latino citizen voting age majority districts in (1) the geographic area including portions of Dallas and Tarrant counties, (2) Harris County, (3) south/central Texas, including portions of Nueces, San Patricio, Bee, Goliad, Karnes, Gonzales, Caldwell, Bastrop and Travis counties and (4) the geographic area of enacted Congressional District 35. LULAC Plaintiffs also assert that Defendants purposefully manipulated district boundaries to weaken Latino voting strength in Congressional District 23, such that Latinos lack the ability to elect their preferred candidates. Finally, LULAC Plaintiffs allege that Defendants manipulated district boundaries in Congressional District 15 with the purpose of reducing Latino voting strength and making it more difficult for Latinos to elect their preferred candidates.