

[REDACTED]

Date: 2025-08-08

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Affirm public info: I agree

Regarding: Congressional

Message:

Dear Chair King, Vice Chair Creighton, and Committee Members:

The Legal Defense Fund, Delta Sigma Theta Sorority, Incorporated, the Barbara Jordan Leadership Institute, the Houston Area Urban League, Black Voters Matter, and Friendship-West Baptist Church submit the attached supplemental public testimony regarding the mid-decade congressional redistricting that is being considered during the special legislative session of the 89th Texas Legislature, which was also shared via email with the Committee this morning.

As our supplemental testimony details, we oppose this mid-decade congressional redistricting for four reasons. First, this Committee has not presented any clear justification to conduct mid-decade congressional redistricting under the current circumstances. Second, we reiterate our concern that the current consideration of whether to conduct mid-decade congressional redistricting lacks transparency and meaningful opportunities for public input. Third, the overwhelming majority of public testimony—submitted only through videoconference and written testimony—opposed any mid-decade congressional redistricting under the current circumstances. Fourth, despite these concerns and warnings, S.B.4, which like the companion bill H.B. 4, further weakens Black and Hispanic Texan voters' electoral opportunities in potential violation of the U.S. Constitution and Voting Rights Act.

We request that a Committee member or staff member confirm receipt of this public testimony submission.

Sincerely,

Leah

[REDACTED]



Houston Area
Urban League



August 8, 2025

Sent via email

Senate Special Committee on Congressional Redistricting
Texas Senate



Austin, Texas

**Re: Supplemental Testimony Strongly Opposing Mid-Decade
Congressional Redistricting Under the Current Circumstances**

Dear Chair King, Vice Chair Creighton, and Committee Members:

The Legal Defense Fund (“LDF”), Barbara Jordan Leadership Institute, Houston Area Urban League, Delta Sigma Theta Sorority, Incorporated, Black Voters Matter, and Friendship-West Baptist Church write to supplement our July 24 testimony.¹ This supplemental testimony reflects some of our current thinking based on the four regional public hearings on congressional redistricting that the Senate Special Select Committee on Congressional Redistricting held on July 25, July 26, July 28, and July 29—*before* the Texas Legislature introduced *any* congressional maps. Our views are also based on the first of three additional hearings this Committee initially scheduled for this week. To be sure, the views expressed herein are not the sum of our many concerns with this mid-decade congressional redistricting process and related to the maps that are being considered.

The Senate’s first additional hearing was held on August 6 wherein this Committee considered only invited testimony on a map titled C2308.² C2308 was introduced as House Bill 4 (“H.B. 4”) on July 30, less than 48 hours after the House Select Committee on Congressional Redistricting (“House Redistricting Committee”) held the last and only hearing on it on August 1.³ The Committee sent invitations to testify with less than 36 hours before the August 6 hearing and with no additional information except that it would

¹ *Opposition to Mid-Decade Congressional Redistricting That Further Harms Black and Other Voters of Color*, NAACP Legal Def. Fund (July 24, 2025), https://www.naacpldf.org/wp-content/uploads/2025.07.24-TX-Congressional-Redistricting-Letter_Senate-final.pdf [hereinafter LDF, et al. July 24 Testimony].

On July 24, the Legal Defense Fund, Barbara Jordan Leadership Institute, Houston Area Urban League, and Delta Sigma Theta Sorority, Incorporated submitted testimony similar in substance to the House Select Committee on Congressional Redistricting. *Id.*
² *Notice of Public Hearing*, Tex. Senate Special Comm. on Cong. Redistricting (Aug. 4, 2025), <https://capitol.texas.gov/tlodocs/89R/schedules/pdf/C6602025080614001.PDF>.

³ *Schedule, Minutes, Witness List and Bills Referred to Committee*, Tex. Senate (Aug. 6, 2025), <https://capitol.texas.gov/Committees/MeetingsByCmte.aspx?Leg=89&Chamber=S&CmteCode=C660>; *Notice of Public Hearing*, Tex. Senate Special Comm. on Cong. Redistricting (Aug. 2025), <https://capitol.texas.gov/tlodocs/89R/schedules/pdf/C6602025080614001.PDF>.

take testimony on C2308. The second hearing was scheduled for the next day August 7, during which the Committee considered public testimony on Senate Bill 4 (“S.B. 4”).⁴ S.B. 4 mirrors the map that was introduced in the House as H.B. 4 on July 30, and voted out of the House Redistricting Committee on August 2.⁵ The third hearing was scheduled for August 8, but the Committee cancelled it at some point on August 7.⁶

Based on our review of these public hearings and our initial review of the recently proposed map, C2308, that is reflected in S.B. 4, which we continue to analyze, we remain strongly opposed to the Governor’s call to conduct mid-decade congressional redistricting under the current circumstances for at least four reasons.

First, this Committee has not presented any clear justification to conduct mid-decade congressional redistricting under the current circumstances. On the one hand, Chair King characterized the initial four regional hearings—in which no legislatively proposed map was available for the public’s consideration—as the “information-gathering” stage because “the Governor added the subject of congressional redistricting on the special session called.”⁷ As our July 24 letter quoted, the Governor’s call to take up congressional redistricting was based expressly on “*constitutional concerns raised by the U.S. Department of Justice*.”⁸ On the other hand, Chair King stated that he disagreed with the Department’s allegations that the current 2021 congressional map is discriminatory,⁹ explaining that he previously voted for a “legal map” and that recent trial testimony, including from Senator Huffman, confirms it as such.¹⁰ Chair King’s statements echo those of Representative Todd Hunter, the sponsor of H.B. 4 and now the companion bill of S.B. 4. When introducing H.B.

⁴ *Id.*

⁵ H.B. 4, Tex. House of Representatives (Aug. 6, 2025), <https://capitol.texas.gov/BillLookup/History.aspx?LegSess=891&Bill=HB00004>.

⁶ *Notice of Public Hearing*, Tex. Senate Special Comm. on Cong. Redistricting (August 2025), <https://capitol.texas.gov/tlodocs/89R/schedules/pdf/C6602025080809001.PDF>.

⁷ Hearing on Congressional Redistricting Before the Senate Special Committee on Congressional Redistricting, 89th Leg. (Tex. July 25, 2025) (statement of Chair King, at 8:26), <https://senate.texas.gov/videooplayer.php?vid=22395&lang=en> [hereinafter July 25 Senate Redistricting Committee Hearing]; Hearing on Congressional Redistricting Before the Senate Special Committee on Congressional Redistricting, 89th Leg. (Tex. July 26, 2025) (statement of Chair King, at 5:12), <https://senate.texas.gov/videooplayer.php?vid=22396&lang=en>.

⁸ See LDF, et al. July 24 Testimony, *supra* note 1, at 2, n.5 (emphasis added); see Letter from Harmeet Dhillon, Assistant Att’y Gen., U.S. DOJ C.R. Div., to Greg Abbott, Governor of Tex. and Ken Paxton, Att’y Gen. of Tex. (July 7, 2025) (notifying Texas officials of “serious concerns regarding the legality of four of Texas’s congressional districts”), available at <https://electionlawblog.org/wp-content/uploads/7-7-2025-DOJ-Letter-re-Unconstitutional-Race-Based-Congressional-Distric.pdf> [hereinafter DOJ July 7 Letter].

⁹ DOJ July 7 Letter, *supra* note 8.

¹⁰ Hearing on Congressional Redistricting Before the Senate Special Committee on Congressional Redistricting, 89th Leg. (Tex. July 29, 2025) (statement of Chair King, at 33:40), <https://senate.texas.gov/videooplayer.php?vid=22414&lang=en> [hereinafter July 29 Senate Redistricting Committee Hearing].

4 to the House Redistricting Committee, Representative Hunter disclaimed that H.B. 4 was developed because of the constitutional issues raised by the Department.¹¹

In our July 24 letter, we explained that the Texas Legislature should not rely on the Department's flawed legal theories to conduct mid-decade congressional redistricting.¹² In particular, the Department flagged four districts, Congressional Districts 9, 18, 29, and 33—all of which are districts comprised of a majority of racial minority voters and represented by Black or Hispanic representatives—as illegal racial gerrymanders. Notably, the same proposed map in H.B. 4 and S.B. 4 make drastic changes to Congressional Districts 9, 18, 29, and 33, among many other districts.¹³ Given the public record as of the date of this letter, the *only*—or at minimum predominant—basis the Department has raised for changing those districts is their racial makeup.¹⁴

Second, we reiterate our concern that the current consideration of whether to conduct mid-decade congressional redistricting lacks transparency and meaningful opportunities for public input. The public has nearly uniformly raised such concerns during the hearings. The public continues to lack basic information about the complete redistricting criteria that is being used by this Committee to guide any mid-decade congressional redistricting and the configuration of specific districts. Nor does the public know how proposed maps, including the more than 100 proposed congressional maps submitted by the public, are being considered and assessed, if at all.¹⁵

¹¹ See, e.g., Hearing on Congressional Redistricting Before the House Select Committee on Congressional Redistricting, 89th Leg. (Tex. Aug. 2nd, 2025) (statement by Rep. Hunter, at 1:26:00) [hereinafter August 2 House Redistricting Committee Meeting].

Indeed, if the Texas Legislature believed there were any legal defects with the current 2021 congressional plan, they could have addressed those in the current litigation or during previous legislative sessions. See Ailsa Chang, Jason Fuller & John Ketchum, *A Texas Republican State Lawmaker on the Fight for Redistricting*, NPR (Aug. 6, 2025).

¹² LDF, et al. July 24 Testimony, *supra* note 1.

¹³ Compare District Viewer, Current Districts(1), Tex. House of Representatives (Aug. 6, 2025), <https://dvr.capitol.texas.gov/Congress/2/PLANC2193>, with *id.* <https://dvr.capitol.texas.gov/Congress/73/PLANC2308>.

¹⁴ Compare DOJ July 7 Letter, *supra* note 8, with, see generally Congressional Redistricting, Select, Tex. House of Representatives (July 24, 2025), <https://house.texas.gov/videos/22388>, Video/Audio -- Archives, Tex. Senate Special Comm. on Cong. Redistricting (August 6, 2025), <https://senate.texas.gov/cmte.php?c=660#publiccomment> (providing links to the videos of the July 25, July 26, July 28, and July 29 regional hearings).

¹⁵ District Viewer, Plans Submitted by Public, 89(1), Tex. House of Representatives (Aug. 7, 2025), <https://dvr.capitol.texas.gov/Congress/72>; House of Representatives Compilation of Public Comments, Submitted to the House on Congressional Redistricting, Tex. House of Representatives (July 28, 2025), <https://capitol.texas.gov/tlodocs/89R/publiccomments/Meetings/C0552025072817001/InputItems/94d732d0-fdaa-4e29-86e4-da7dbbc4fda4.pdf#navpanes=0>.

The public still also lacks knowledge about how legislatively introduced maps are being developed, who takes part in developing them,¹⁶ what demographic, electoral, or other any information is being considered in their development,¹⁷ and other such information that illuminates basic and reasonable guideposts about new congressional maps and specific district formations. As this Committee is aware, H.B. 4 was provided to the public with less than 48 hours before the House Redistricting Committee held its only public hearing on it. That one hearing took place from 10:00 a.m. on Friday, August 1, to about 1:00 a.m. on Saturday, August 2. To be clear, the public had less than two days to consider that map and when it was heard, it was done over 10 hours, overlapping with “normal” workday hours, in a rushed and non-transparent marathon of a hearing running into the early morning on a Saturday.

Just seven hours later, the House Redistricting Committee voted H.B. 4 out of committee shortly after commencing a new meeting at 9:00 a.m. on August 2. In introducing his bill, Representative Hunter invoked various privileges, refusing to publicly disclose what he asked the law firm hired to develop the map to do, what criteria the firm considered, what analyses the firm conducted, and what data was used to sort voters among redrawn districts, among many other basic questions.¹⁸ Consequently, neither Representative Hunter, let alone anyone who actually developed the map, has been able to explain the map and the districts within them to the public beyond providing general responses. In cloning S.B. 4 after H.B. 4 and without introducing any further explanation for S.B. 4’s development, including from legislator-bill sponsors or those working with them, this Committee thus far appears to similarly lack basic background information about who developed the map and what considerations went into it.

Third, on the Senate side, the overwhelming majority of public testimony—submitted *only* through videoconference and written testimony—opposed any mid-decade congressional redistricting under the current circumstances. Consistent with that public testimony, if the Texas Legislature wants to meaningfully address claims of racial discrimination, as we relayed it should be compelled to do in our July 24 testimony, the Legislature should convene a separate legislative session to address the harms documented with evidence in the consolidated case in the ongoing federal litigation challenging the 2021 congressional plan.¹⁹ It should not be doing what is occurring in this special session—ramming a map through the special 30-day legislative session with little to no knowledge about the who, what, when, where, why, and how it was developed. It also should not be

¹⁶ Representative Hunter disclosed that the law firm of Butler Snow developed C2308 and shared it with Representative Hunter to sponsor it. August 2 House Redistricting Committee Meeting, *supra* note 11 (statements by Rep. Hunter, at 1:29:50). In response to a question about what data and other information went into the development of C2308, as approximately 150 pages of data and other information accompanied H.B. 4, for example, Representative Hunter said that he “do[esn’t] have the specifics.” *Id.* (statement by Rep. Hunter, at 1:32:30).

¹⁷ Representative Hunter did not know who the law firm Butler Snow may have worked with in developing C2308, either in whole or in part. *Id.* (statement by Rep. Hunter, at 1:48:30).

¹⁸ *Id.* (statements by Rep. Hunter, 1:48:00 and 1:51:45).

¹⁹ *League of United Latin Am. Citizens v. Abbott*, Dkt. No. 3:21-cv-00259-DCG-JES-JVB (W.D. Tex. 2022).

doing so while people are working, recovering from disasters, and left with little to no time to absorb and understand how a map of such significance will impact their lives. Indeed, as our July 24 testimony warned, any revised congressional map must comply with the U.S. Constitution and the Voting Rights Act and avoid further restricting access to electoral opportunity and representation for Black, Hispanic, and other racial minority voters.²⁰

Fourth, despite these concerns and warnings, S.B.4, like the companion bill H.B. 4, further weakens Black and Hispanic Texan voters' electoral opportunities. Consistent with other members of the public, our July 24 testimony detailed that the Legislature had no factual or legal basis to use this mid-decade redistricting to significantly alter districts in any way that denies Black and Hispanic voters their electoral opportunities.²¹ We and other members of the public, for example, warned this Committee not to disturb Congressional Districts 9 and 18 in Harris County in any way that disturbs how those districts have each been functioning for Black voters to elect their preferred Black representatives in elections.²² Other public testimony also warned this Committee about the need for Hispanic voters also to have access to representation in Harris County and the Dallas Fort-Worth area, among other areas, based on the current demographics and electoral patterns.²³ These concerns and warnings were repeatedly reiterated during oral testimony presented to this Committee during the four regional hearings.²⁴ Testimony, for example, reflected a recognition that it is possible to maintain electoral opportunity each for Black and Latino voters in Harris and Dallas-Fort Worth, while also establishing new opportunities for racial minority voters in Harris and Dallas County.

Ours and other public testimony also stressed that the only basis offered, at least initially, to consider altering districts like 9, 18, 29, and 33—all currently serving racial minority Texan voters and electing Black or Hispanic representatives—was the Department's criticism of their racial makeup.²⁵ To date, neither this Committee nor the Department has publicly pointed to any credible legal or factual analysis justifying such

²⁰ LDF, et al. July 24 Testimony, *supra* note 1.

²¹ LDF, et al. July 24 Testimony, *supra* note 1; Congressional Redistricting, Select, Tex. House of Representatives (July 24, 2025), <https://house.texas.gov/videos/22388>; Video/Audio -- Archives, Tex. Senate Special Committee on Congressional Redistricting (August 6, 2025), <https://senate.texas.gov/cmte.php?c=660#publiccomment> (providing links to the videos of the July 25, July 26, July 28, and July 29 regional hearings and public comments submitted to the Committee) [hereinafter Public Comments and Testimony Submitted to the Committee]

²² See, e.g., July 24 LDF et al. Testimony, *supra* note 1; see generally Hearing on Congressional Redistricting Before the Senate Special Committee on Congressional Redistricting, 89th Leg. (Tex. July 28, 2025), <https://senate.texas.gov/videoplayer.php?vid=22397&lang=en> (statement by Judson Robinson on behalf of the Houston Area Urban League, at 1:28:20).

²³ See, e.g., Hearing on Congressional Redistricting Before the Senate Special Committee on Congressional Redistricting, 89th Leg. (Tex. July 25, 2025) (statement of Rep. Sylvia Garcia, at 53:20), <https://senate.texas.gov/videoplayer.php?vid=22395&lang=en>.

²⁴ Public Comments and Testimony Submitted to the Committee, *supra* note 21.

²⁵ LDF et al. July 24 Testimony, *supra* note 1; see also Public Comments and Testimony Submitted to the Committee, *supra* note 21.

significant disruptions to those district configurations.²⁶ In fact, as noted above, Chair King publicly stated he disagreed with the Department's allegations about specific districts like 9, 18, 29, and 33, maintaining that the current 2021 congressional map is a legal map.²⁷

As just one example of our concerns, S.B. 4 packs Black voters in Congressional District 18 at levels that are unnecessary to provide them with electoral opportunity,²⁸ while eliminating another effective opportunity for Black voters in Congressional District 9.²⁹ In so doing, the Committees that have considered H.B. 4 and S.B. 4 admit that it is possible to develop a reasonably configured, majority Black citizen voting-age population (or another such form of an opportunity) district in Harris County in Congressional District 18. Similarly, the proposed map increases the Black citizen voting-age population to just above 50% in Congressional District 30 in the Dallas Forth-Worth area, despite that that district has been performing for Black voters in recent elections.³⁰ But nothing in the Voting Rights Act or other federal case law interpreting that statute requires that an illustrative district that must meet the 50% plus one requirement for a single-racial group also must be the operative district.³¹ To be clear, while Congressional District 18 in Harris County and

²⁶ DOJ July 7 Letter, *supra* note 8; *see also* Public Comments and Testimony Submitted to the Committee, *supra* note 21.

²⁷ July 29 Senate Redistricting Committee Hearing, *supra* note 10, (statement of Chair King, at 33:54); *see also* August 2 House Redistricting Committee Meeting, *supra* note 11 (statement by Rep. Hunter, at 1:44:30) (stating he was told by the law firm Butler Snow that he worked with to develop the 2021 congressional map that it is legally compliant).

²⁸ Compare American Community Survey Special Tabulation Using Census and American Community Survey Data, Congressional Districts – Plan C2193, Tex. Legislative Council (Feb. 19, 2025), https://data.capitol.texas.gov/dataset/b806b39a-4bab-4103-a66a-9c99bcaba490/resource/351077a4-ed22-4c33-bea5-8057e996622e/download/planc2193_r116_acs1923.pdf (reflecting that the BCVP in Congressional District 18 in the 2021 existing map is 34.4%) [hereinafter 2021 Plan CVAPs by Congressional Districts], with American Community Survey Special Tabulation Using Census and American Community Survey Data, Congressional Districts _Plan C2308 (July 30, 2025), <https://data.capitol.texas.gov/dataset/6c8aed8d-c0e7-4520-b917-b10dcee44f67/resource/3c370c70-8d44-445c-9d6d-e0933f2198c5/download/planc2308r116.pdf> (reflecting that the BCVP in the proposed map is 50.8%) [hereinafter H.B. 4 CVAPs by Congressional Districts].

²⁹ Compare 2021 Plan CVAPs by Congressional Districts, *supra* note 29 (reflecting that the BCVP in Congressional District 9 in the 2021 existing map is 38.6%), with H.B. 4 CVAPs by Congressional Districts, *supra* note 29 (reflecting that the BCVP in Congressional District 9 in the proposed map is 12.1%).

³⁰ *See, e.g., Cooper v. Harris*, 581 U.S. 285, 302-04 (2017); *see also infra* note 32.

³¹ Compare *Thornburg v. Gingles*, 478 U.S. 30, 42-43 (1986) (identifying what is required to show Section 2 liability under prong one of a discriminatory results vote dilution analysis), with *Bartlett v. Strickland*, 556 U.S. 1, 24 (2009) (holding that while Section 2 does not *require* the creation of districts that are less than 50 percent minority voting-age population, it observed such districts are not *prohibited* by Section 2); *see also id.* at 24 (“States that wish to draw crossover districts are free to do so where no other prohibition exists.”). Indeed, “[t]he option to draw such [crossover] districts gives legislatures a choice that can lead to less racial isolation, not more.” *Id.* at 23. To be sure, “§ 2 allows States to choose their own method of complying with the Voting Rights Act, and we have said that may include drawing crossover districts.” *Id.*; *see also Cooper*, 581 U.S. at 302-04.

Congressional District 30 in the Dallas-Fort Worth area each may be a district in which Black voters can comprise a majority of Black voters, recent elections show that neither Congressional Districts 18 nor 30 need be a majority-Black district to provide voters within those districts each with electoral opportunity, as the Voting Rights Act and U.S. Constitution require.³²

As we stated in our July 24 testimony, Texas is home to the largest number of Black registered voters among all 50 states.³³ Many of those Black voters live in Houston and Dallas-Fort Worth.³⁴ The proposed plan does not reflect the electoral opportunities for racial minority voters in those areas.

We urge the Legislature to not adopt this map that runs afoul of fair processes, as well as the U.S. Constitution and Voting Rights Act in several ways. To reiterate, the public has a right to know the who, what, when, where, why, and how any legislatively proposed map is developed. They have a right to the necessary time to understand the implications of a map for their lives in a meaningful and transparent process. Additionally, as explained above, among other harms, S.B. 4 eliminates effective opportunities for Black voters in Harris County because of their racial makeup. As our July 24 letter referenced, the Supreme Court explained in *Bartlett v. Strickland*, 556 U.S. 1, 24 (2009), “if there were a showing that a State intentionally drew district lines in order to destroy otherwise effective crossover districts, that would raise serious questions under both the Fourteenth and Fifteenth Amendments” to the U.S. Constitution. S.B. 4 also strains the promises of the Voting Rights Act. It does so, as one example, by needlessly packing Black voters in districts in which they comprise the majority in Harris and Dallas-Fort Worth areas, where it has been shown to be unnecessary for Black voters to participate in elections effectively. *Id.* at 23-24. And, in light of recent testimony and the significant changes proposed for congressional districts serving racial minority voters, S.B. 4 appears to harm Black voters as a means to increase political advantage, which is also prohibited by the U.S. Constitution.³⁵

³² A rigid rule or interpretation of the Voting Rights Act requiring the creation of a majority-minority district whenever a Section 2 violation exists could violate *Shaw*’s directive that Section 2 remedies should be “narrowly tailored.” *Shaw v. Hunt*, 517 U.S. 899, 908 (1996). As the Supreme Court cautioned in *Bartlett*, Section 2 “should not be interpreted to entrench majority-minority districts by statutory command, for that ... could pose constitutional concerns,” 556 U.S. at 23-24, by increasing, rather than reducing, the degree of race-based decision-making involved in redistricting determinations; see also *Cooper*, 581 U.S. at 302-04.

³³ LDF, et al. July 24 Testimony, *supra* note 1, at 5.

³⁴ *Black History Month: African Americans in Texas*, Tex. Demographic Ctr. (2022), https://demographics.texas.gov/Visualizations/2022/BlackHistoryMonth/2022_BlackHistoryMonthGraphic.pdf; Bethany Blankley, *Census: Texas, Harris County Have Largest Black Population in U.S.*, The Center Square (June 28, 2023), https://www.thecentersquare.com/texas/article_e9a1ce44-15ac-11ee-8ff3-3f10caf1ff51.html.

³⁵ *Alexander v. South Carolina State Conference of the NAACP*, 602 U.S. 1, 8, n.1 (2024); *League of United Latin Am. Citizens v. Perry*, 548 U.S. 399, 440 (2006) (stating that taking away a political opportunity just as minority voters were about to exercise it “bears the mark of intentional



Houston Area
Urban League

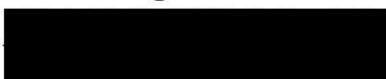


As we continue to stress, at issue is the right to be a part of our shared democratic processes, including the right to urge representatives to act in service of all the rights that flow from political participation like funding for schools, environmental disaster relief, healthcare, and jobs that pay living wages.³⁶

For all these reasons, following the conclusion of this Committee's public hearings, we continue to urge Texas' Legislature to refrain from conducting mid-decade congressional redistricting under these circumstances. We further reiterate that the Legislature must not line draw in any way that further harms Black Texan voters and other voters of color and risks further damage to those communities.

Sincerely,

Demetria McCain (TX Bar No.
24060927)
Louis Bedford (TX Bar. No. 24109630)
NAACP Legal Defense Fund



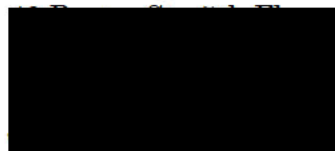
Khanay Turner, Executive Director
Barbara Jordan Leadership Institute



Judson Robinson, President & CEO
Houston Area Urban League

Cliff Albright, Co-founder
April England-Albright, National Legal
Director
Black Voters Matter

Leah C. Aden
John S. Cusick
NAACP Legal Defense Fund



Cheryl W. Turner
International President & Chair, Board of
Directors
Delta Sigma Theta Sorority, Incorporated

Dr. Frederick D. Haynes, III, Senior
Pastor
Friendship-West Baptist Church

cc: The Honorable Greg Abbott
c/o Trevor Ezell and Robert Black

discrimination"); *Hunter v Underwood*, 471 U.S. 222, 233 (1985) (finding intentional discrimination where a state enacted a law to harm Black and poor white voters for partisan purposes); *Bartlett*, 556 U.S. at 24.

³⁶ Cf. *Yick Wo v. Hopkins*, 118 U.S. 356, 370 (1886).



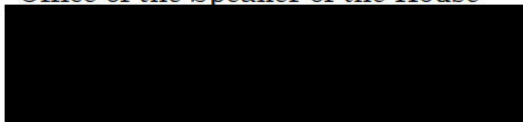
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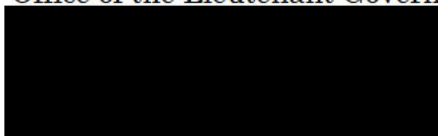
Office of the Governor



The Honorable Dustin Borrows
c/o Sarah Harrington
Office of the Speaker of the House



The Honorable Dan Patrick
Office of the Lieutenant Governor



The Honorable Ken Paxton
c/o Austin Kinghorn and Ryan Walters
Office of the Attorney General



NAACP Legal Defense and Educational Fund, Inc. ("LDF")

Since its founding in 1940, LDF has used litigation, policy advocacy, public education, and community organizing strategies to achieve racial justice and equity in education, economic justice, political participation, and criminal justice. Throughout its history, LDF has worked to enforce and promote laws and policies that increase access to the electoral process and prohibit voter discrimination, intimidation, and suppression. LDF has been fully separate from the NAACP since 1957, though LDF was originally founded by the NAACP and shared its commitment to equal rights.

Barbara Jordan Leadership Institute

As a nonpartisan organization founded and led by Black women driven by our lived experiences, The Barbara Jordan Leadership Institute (BJLI) provides a comprehensive approach to community based leadership in action through voter education, advocacy, and leadership development. BJLI mission is to increase the diversity of leadership by training, mentoring, supporting, and uplifting Black communities throughout Texas.



Houston Area
Urban League



Houston Area Urban League

The Houston Area Urban League (“HAUL”) is a nonpartisan, nonprofit organization with its principal office in Houston. HAUL’s mission is to enable Black people and other marginalized communities to secure economic self-reliance, parity, power, and civil rights.

Delta Sigma Theta Sorority, Incorporated

Delta Sigma Theta Sorority, Incorporated was founded on January 13, 1913, on the campus of Howard University to promote academic excellence; to provide scholarships; to provide support to the underserved; educate and stimulate participation in the establishment of positive public policy; and to highlight issues and provide solutions for problems in their communities. Since its founding, more than 350,000 women have joined the organization, making it one of the largest predominantly Black women’s organizations in the country. Delta Sigma Theta Sorority, Incorporated has over 1,000 collegiate and alumnae chapters worldwide, continuing to uplift Black communities globally through its unwavering mission and strategic action.

The Sorority’s tradition of activism on the frontlines dates back to just weeks after its inception, when its Founders boldly marched in the 1913 Women’s Suffrage Parade—the only Black women’s organization to do so. In keeping with this tradition, members of Delta Sigma Theta conduct voter registration drives and host voter education programs on many topics, including redistricting. Delta Sigma Theta has 75 chapters, alumnae and collegiate, and approximately 20,445 members in Texas, most of whom are registered voters in Texas.

Black Voters Matter

Black Voters Matter is a fund that supports local organizations and leaders working for social justice and civic engagement in predominantly Black communities. BVM’s goal is to increase power in marginalized, predominantly Black communities. BVM achieves this goal through voter registration/get-out-the-vote activities, policy advocacy, development and training, and electoral communications.

Friendship-West Baptist Church

Friendship-West Baptist Church’s vision is to live into becoming a game-changing Christian movement, connecting people to Jesus Christ and fighting for justice, while creating the beloved community.