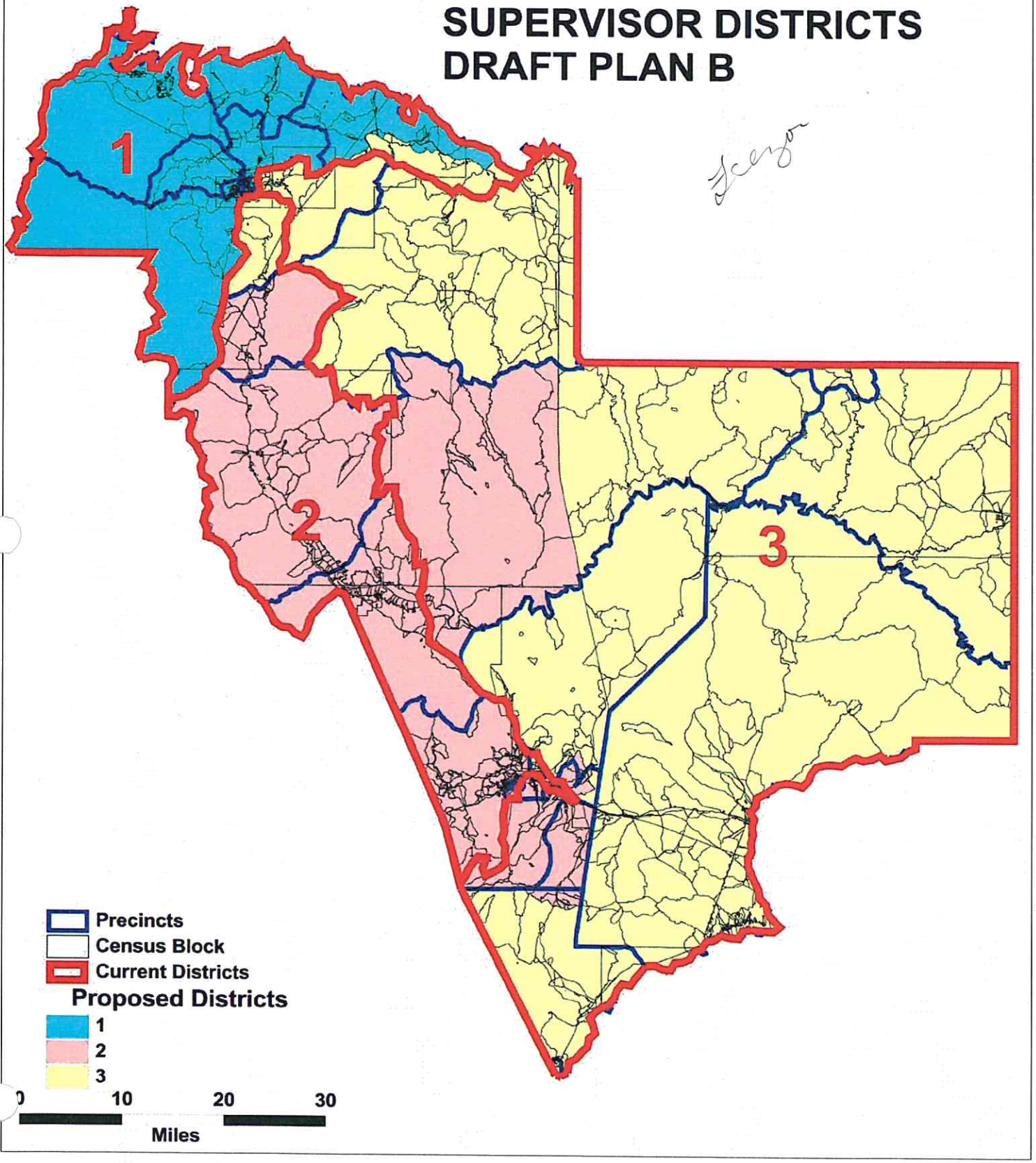
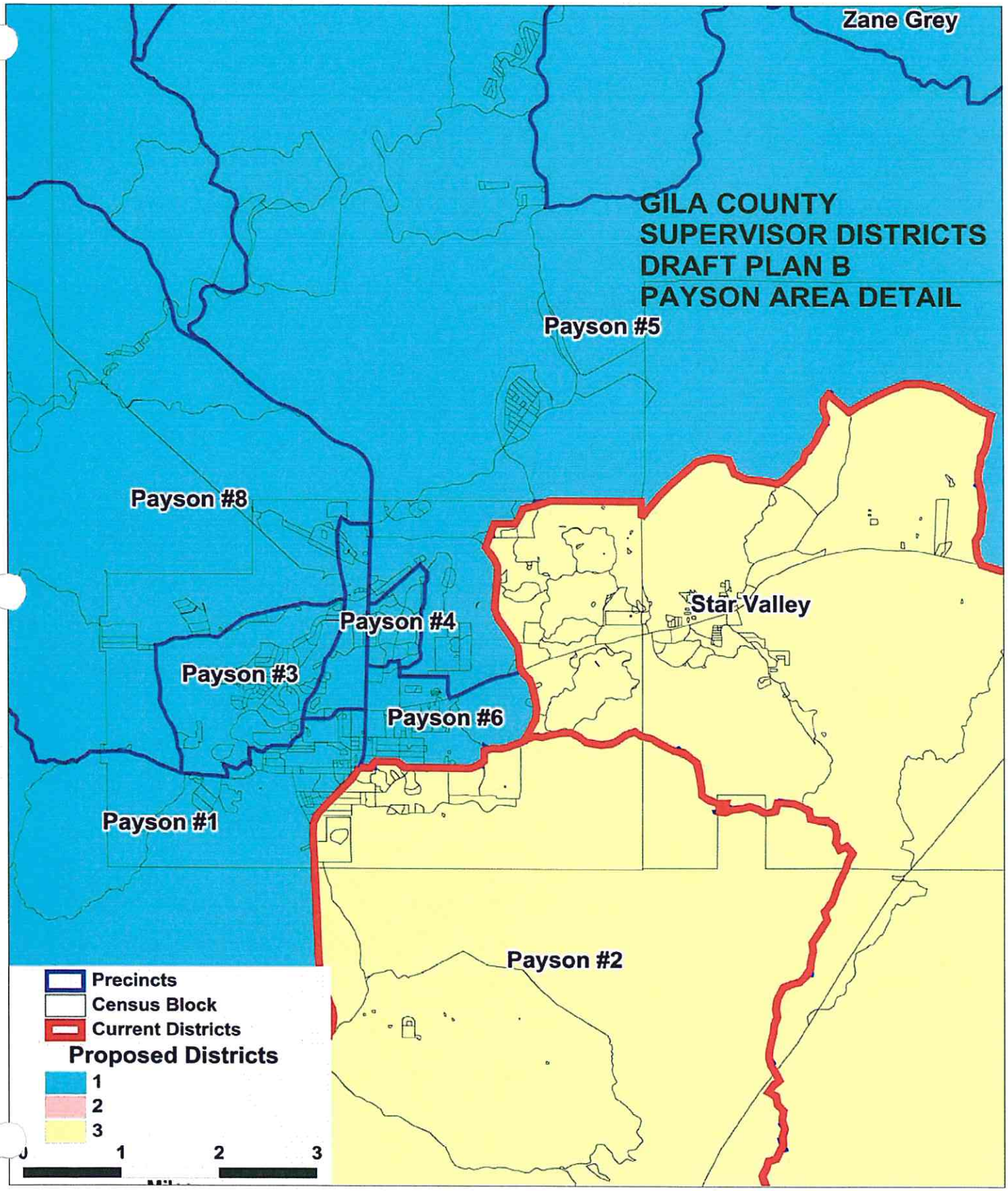
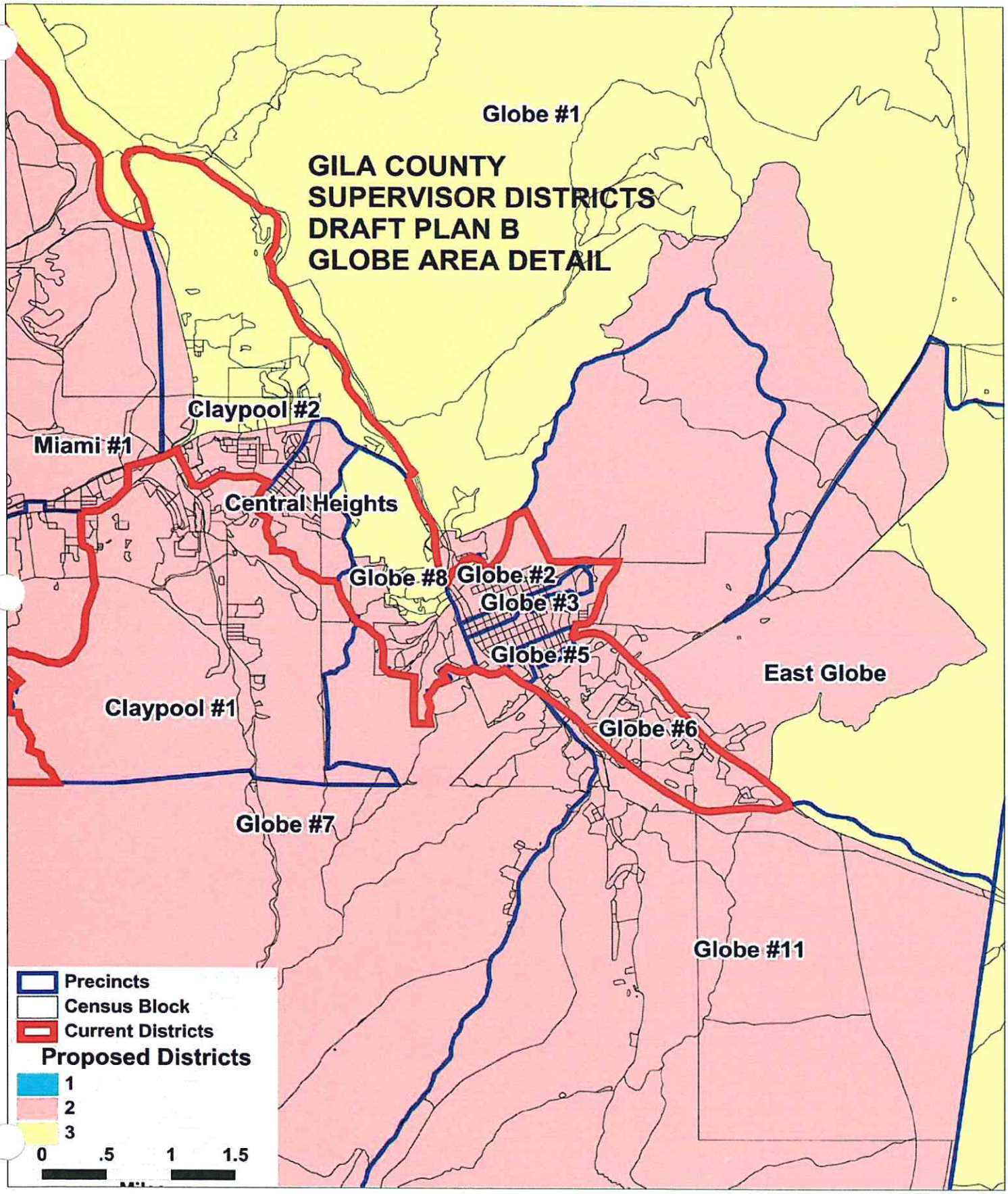
GILA COUNTY
SUPERVISOR DISTRICTS
DRAFT PLAN B




Zane Grey
GILA COUNTY
SUPERVISOR DISTRICTS
DRAFT PLAN B
PAYSON AREA DETAIL
Payson #5
Payson #8
Payson #4
Payson #3
Payson #6
Payson #1
Star Valley
Payson #2
Precincts
Census Block
Current Districts
Proposed Districts
1
2
3
0
1
2
3


GILA COUNTY
SUPERVISOR DISTRICTS
DRAFT PLAN B
GLOBE AREA DETAIL
Globe #1
Claypool #2
Miami #1
Central Heights
Globe #8
Globe #2
Globe #3
Globe #5
East Globe
Claypool #1
Globe #6
Globe #7
Globe #11
Precincts
Census Block
Current Districts
Proposed Districts
1
2
3
0
.5
1
1.5

GILA COUNTY SUPERVISORIAL DISTRICTS
TOTAL POPULATION BY RACE AND HISPANIC ORIGIN
DRAFT PLAN B

Number:	District 1	District 2	District 3	Total, All Districts
Hispanic, of any race	1,465	5,257	2,866	***9,588***
Non-Hispanic White	15,891	11,751	7,656	***35,298***
Non-Hispanic Black	85	98	65	***248***
Non-Hispanic American Indian	356	677	6,942	***7,975***
Non-Hispanic Asian	114	126	81	***321***
Non-Hispanic Hawaiian	22	5	12	***39***
Non-Hispanic other race	20	24	22	***66***
Non-Hispanic two or more races	13	23	26	***62***
Total Population	***17,966***	***17,961***	***17,670***	***53,597***
Percent:				
Hispanic, of any race	8.15%	29.27%	16.22%	***17.89%***
Non-Hispanic White	88.45%	65.43%	43.33%	***65.86%***
Non-Hispanic Black	0.47%	0.55%	0.37%	***0.46%***
Non-Hispanic American Indian	1.98%	3.77%	39.29%	***14.88%***
Non-Hispanic Asian	0.63%	0.70%	0.46%	***0.60%***
Non-Hispanic Hawaiian	0.12%	0.03%	0.07%	***0.07%***
Non-Hispanic other race	0.11%	0.13%	0.12%	***0.12%***
Non-Hispanic two or more races	0.07%	0.13%	0.15%	***0.12%***
Total Percent	***100.00%***	***100.00%***	***100.00%***	***100.00%***
Ideal Population	17,866	17,866	17,866	***Total***
Total Population	17,966	17,961	17,670	***deviation:***
Numeric deviation from Ideal Value	100	95	-196	***296***
Percent deviation from Ideal Value	0.56%	0.53%	-1.10%	***1.66%***

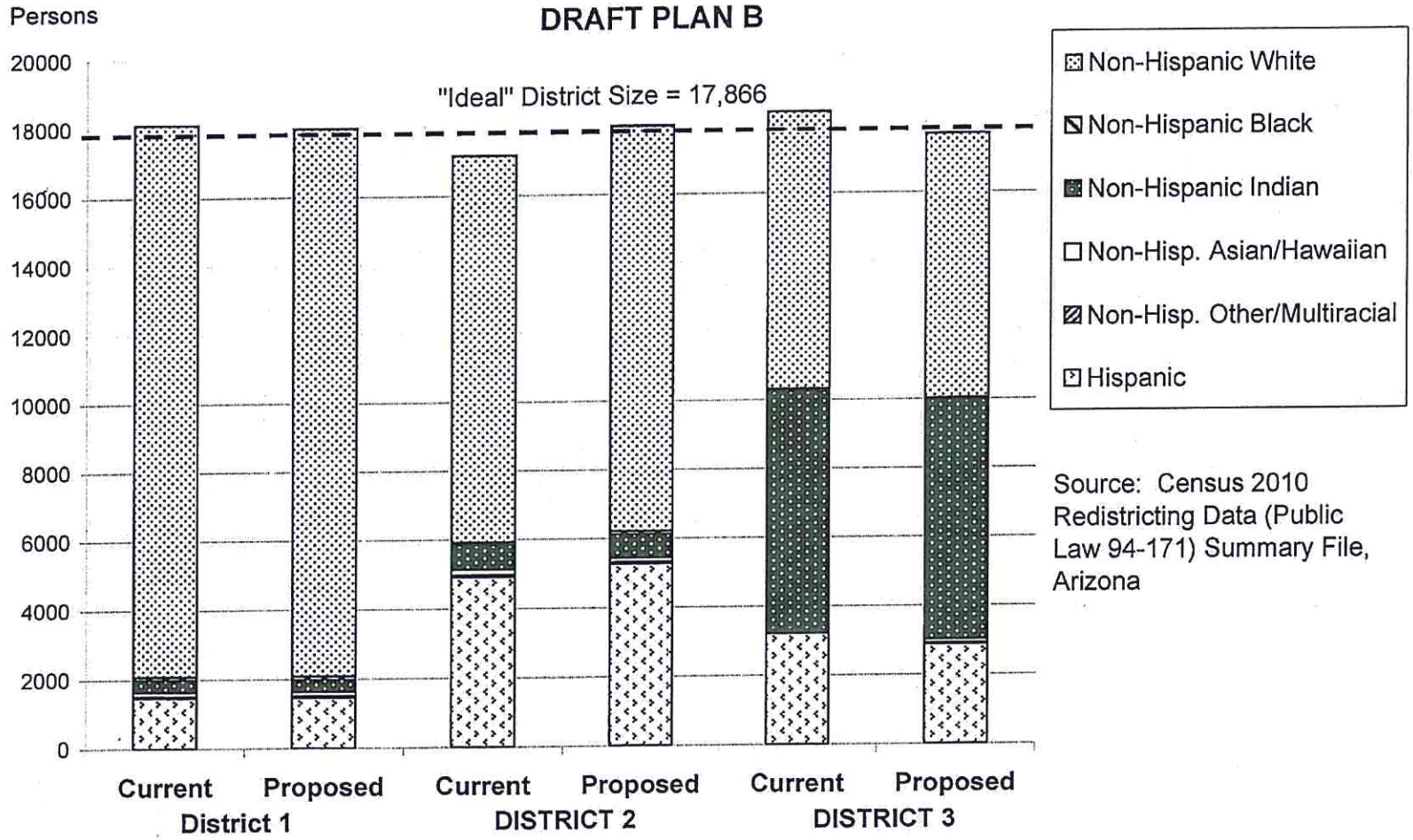
Source: Census 2010 Redistricting Data (Public Law 94-171) Summary file, Arizona
Tabulation: Research Advisory Services, Inc., Phoenix AZ (602) 230-9580

GILA COUNTY SUPERVISORIAL DISTRICTS
VOTING-AGE POPULATION BY RACE AND HISPANIC ORIGIN
DRAFT PLAN B

Voting-Age Number:	District 1	District 2	District 3	Total, All Districts
Hispanic, of any race	945	3,629	1,945	***6,519***
Non-Hispanic White	13,682	9,792	6,448	***29,922***
Non-Hispanic Black	47	76	48	***171***
Non-Hispanic American Indian	265	457	4,423	***5,145***
Non-Hispanic Asian	90	97	65	***252***
Non-Hispanic Hawaiian	17	3	10	***30***
Non-Hispanic other race	9	16	19	***44***
Non-Hispanic two or more races	11	16	16	***43***
Voting-Age Population	***15,066***	***14,086***	***12,974***	***42,126***
Voting-Age Percent:				
Hispanic, of any race	6.27%	25.76%	14.99%	***15.48%***
Non-Hispanic White	90.81%	69.52%	49.70%	***71.03%***
Non-Hispanic Black	0.31%	0.54%	0.37%	***0.41%***
Non-Hispanic American Indian	1.76%	3.24%	34.09%	***12.21%***
Non-Hispanic Asian	0.60%	0.69%	0.50%	***0.60%***
Non-Hispanic Hawaiian	0.11%	0.02%	0.08%	***0.07%***
Non-Hispanic other race	0.06%	0.11%	0.15%	***0.10%***
Non-Hispanic two or more races	0.07%	0.11%	0.12%	***0.10%***
Voting-Age Percent	***100.00%***	***100.00%***	***100.00%***	***100.00%***

Source: Census 2010 Redistricting Data (Public Law 94-171) Summary file, Arizona
Tabulation: Research Advisory Services, Inc., Phoenix AZ (602) 230-9580

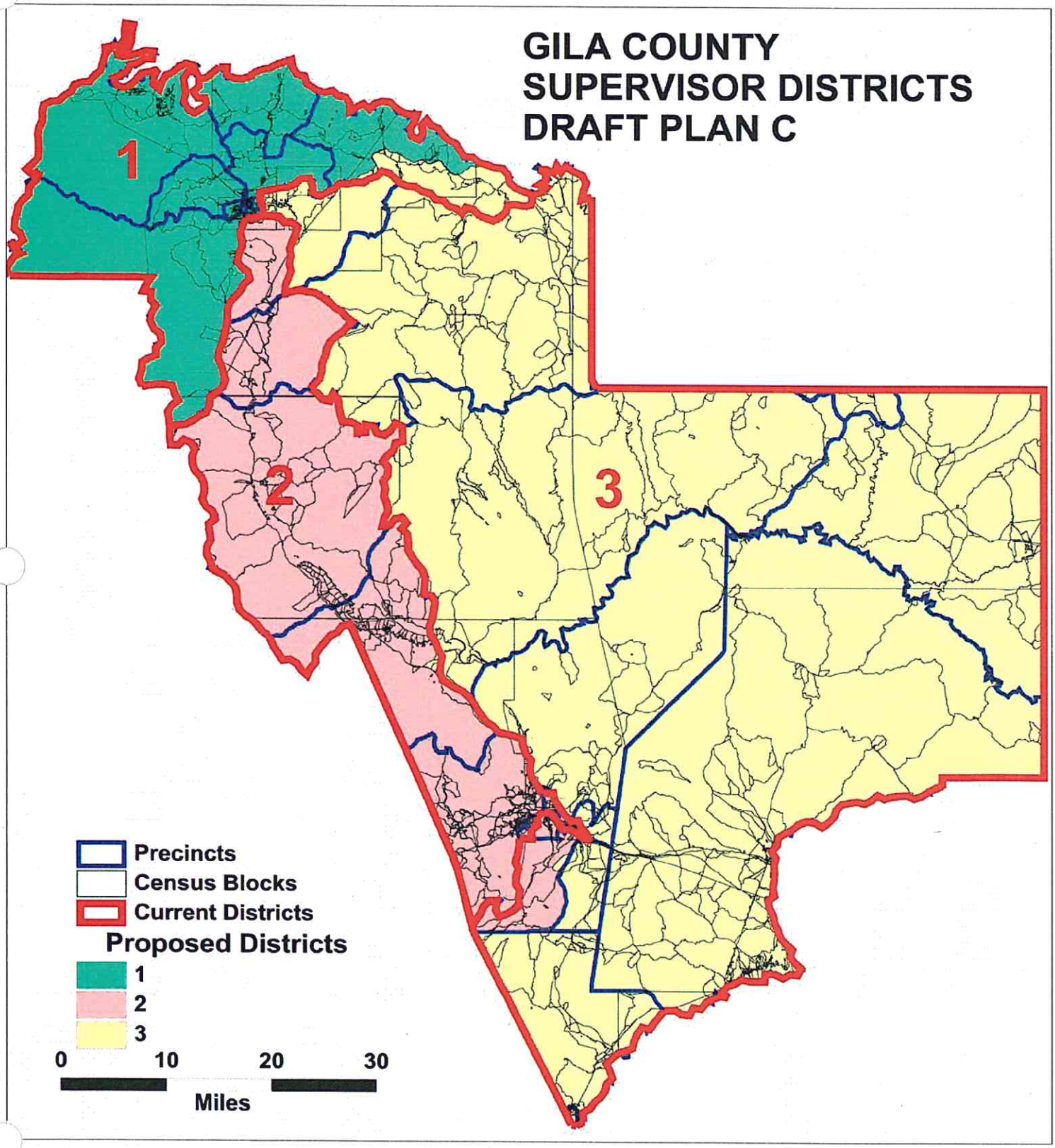
Race and Origin Composition of Current and Proposed Gila County Supervisorial Districts
DRAFT PLAN B

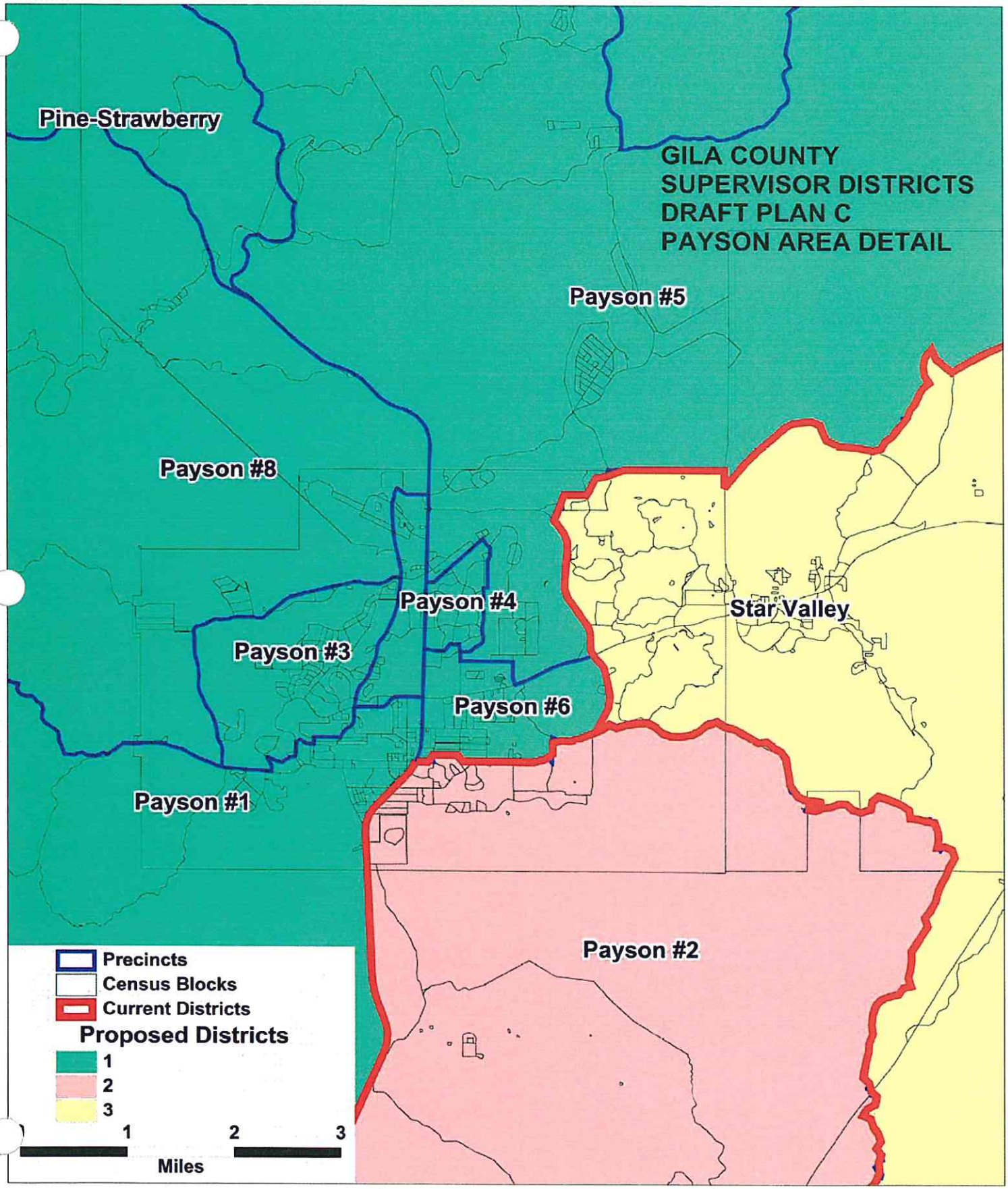


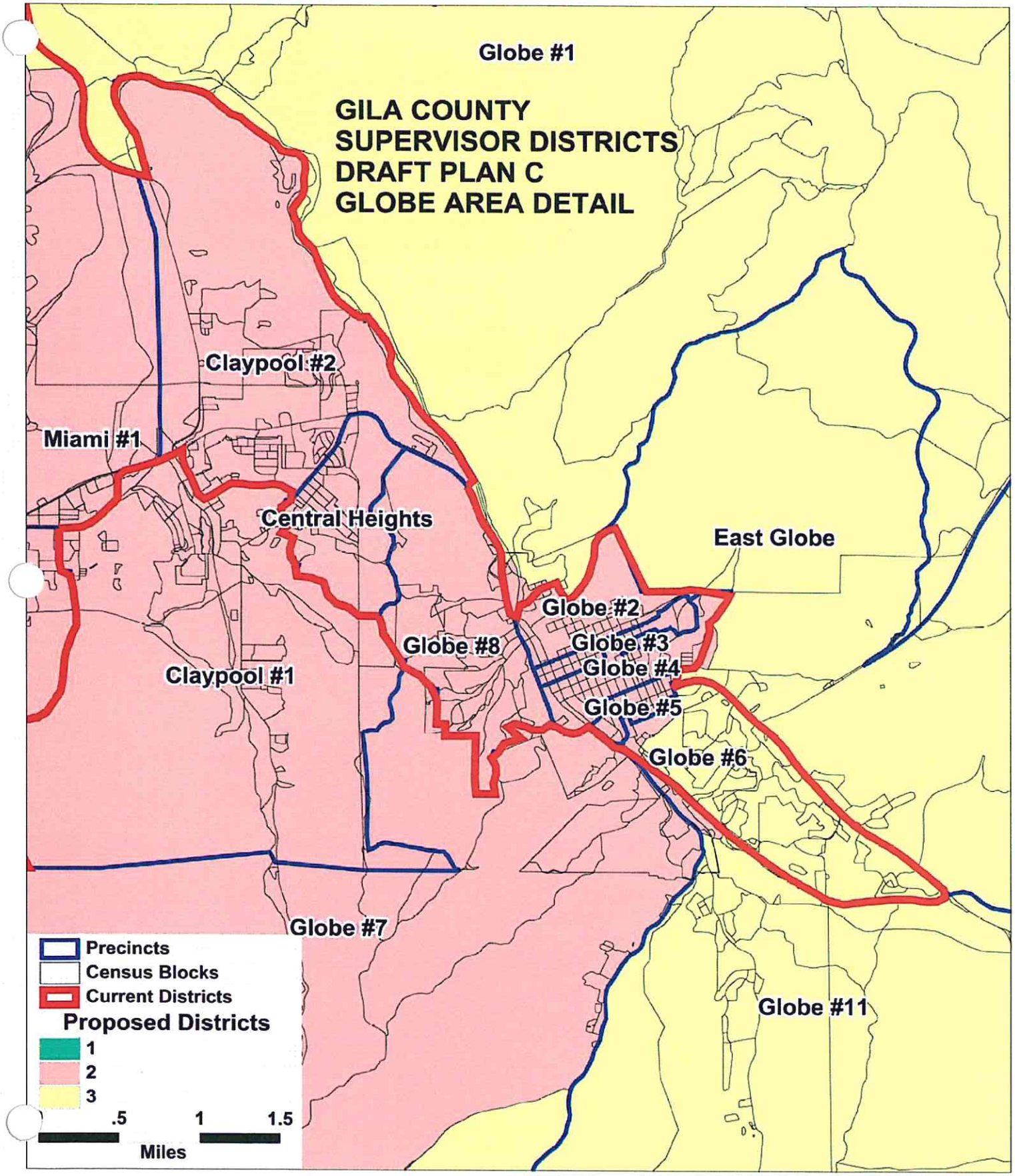
Source: Census 2010 Redistricting Data (Public Law 94-171) Summary File, Arizona

GILA COUNTY SUPERVISORIAL DISTRICTS
DRAFT PLAN B

	Current	Proposed Plan	Change
Population, District 1	18,105	17,966	-139
Population, District 2	17,151	17,961	810
Population, District 3	18,341	17,670	-671
Population deviation, District 1	239	100	
Population deviation, District 2	-715	95	
Population deviation, District 3	475	-196	
Percent deviation, District 1	1.34%	0.56%	
Percent deviation, District 2	-4.00%	0.53%	
Percent deviation, District 3	2.66%	-1.10%	
Total plan deviation, number	1,190	296	
Total plan deviation, percent	6.66%	1.66%	
Percent voting-age Hispanic, District 1	6.23%	6.27%	0.04%
Percent voting-age Hispanic, District 2	24.88%	25.76%	0.88%
Percent voting-age Hispanic, District 3	16.45%	14.99%	-1.46%
Percent V-A Non-Hispanic Native American, District 1	1.75%	1.76%	0.01%
Percent V-A Non-Hispanic Native American, District 2	3.63%	3.24%	-0.39%
Percent V-A Non-Hispanic Native American, District 3	32.77%	34.09%	1.32%
Percent V-A Non-Hispanic Black, District 1	0.31%	0.31%	0.00%
Percent V-A Non-Hispanic Black, District 2	0.46%	0.54%	0.08%
Percent V-A Non-Hispanic Black, District 3	0.46%	0.37%	-0.09%
Percent voting-age total minority residents, District 1	9.13%	9.19%	0.06%
Percent voting-age total minority residents, District 2	30.16%	30.48%	0.32%
Percent voting-age total minority residents, District 3	50.28%	50.30%	0.02%


GILA COUNTY
SUPERVISOR DISTRICTS
DRAFT PLAN C
1
2
3
Precincts
Census Blocks
Current Districts
Proposed Districts
1
2
3
0
10
20
30
Miles


Pine-Strawberry
GILA COUNTY
SUPERVISOR DISTRICTS
DRAFT PLAN C
PAYSON AREA DETAIL
Payson #5
Payson #8
Payson #4
Star Valley
Payson #3
Payson #6
Payson #1
Payson #2
Precincts
Census Blocks
Current Districts
Proposed Districts
1
2
3
1
2
3
Miles


Globe #1
GILA COUNTY
SUPERVISOR DISTRICTS
DRAFT PLAN C
GLOBE AREA DETAIL
Claypool #2
Miami #1
Central Heights
East Globe
Globe #2
Globe #3
Globe #4
Globe #5
Globe #6
Globe #8
Claypool #1
Globe #7
Globe #11
Precincts
Census Blocks
Current Districts
Proposed Districts
1
2
3
.5
1
1.5
Miles

GILA COUNTY SUPERVISORIAL DISTRICTS
TOTAL POPULATION BY RACE AND HISPANIC ORIGIN
DRAFT PLAN C

Number:	District 1	District 2	District 3	Total, All Districts
Hispanic, of any race	1,463	5,178	2,947	***9,588***
Non-Hispanic White	15,799	11,807	7,692	***35,298***
Non-Hispanic Black	83	93	72	***248***
Non-Hispanic American Indian	356	686	6,933	***7,975***
Non-Hispanic Asian	114	128	79	***321***
Non-Hispanic Hawaiian	22	11	6	***39***
Non-Hispanic other race	20	31	15	***66***
Non-Hispanic two or more races	13	21	28	***62***
Total Population	***17,870***	***17,955***	***17,772***	***53,597***
Percent:				
Hispanic, of any race	8.19%	28.84%	16.58%	***17.89%***
Non-Hispanic White	88.41%	65.76%	43.28%	***65.86%***
Non-Hispanic Black	0.46%	0.52%	0.41%	***0.46%***
Non-Hispanic American Indian	1.99%	3.82%	39.01%	***14.88%***
Non-Hispanic Asian	0.64%	0.71%	0.44%	***0.60%***
Non-Hispanic Hawaiian	0.12%	0.06%	0.03%	***0.07%***
Non-Hispanic other race	0.11%	0.17%	0.08%	***0.12%***
Non-Hispanic two or more races	0.07%	0.12%	0.16%	***0.12%***
Total Percent	***100.00%***	***100.00%***	***100.00%***	***100.00%***
Ideal Population	17,866	17,866	17,866	***Total***
Total Population	17,870	17,955	17,772	***deviation:***
Numeric deviation from Ideal Value	4	89	-94	***183***
Percent deviation from Ideal Value	0.02%	0.50%	-0.52%	***1.02%***

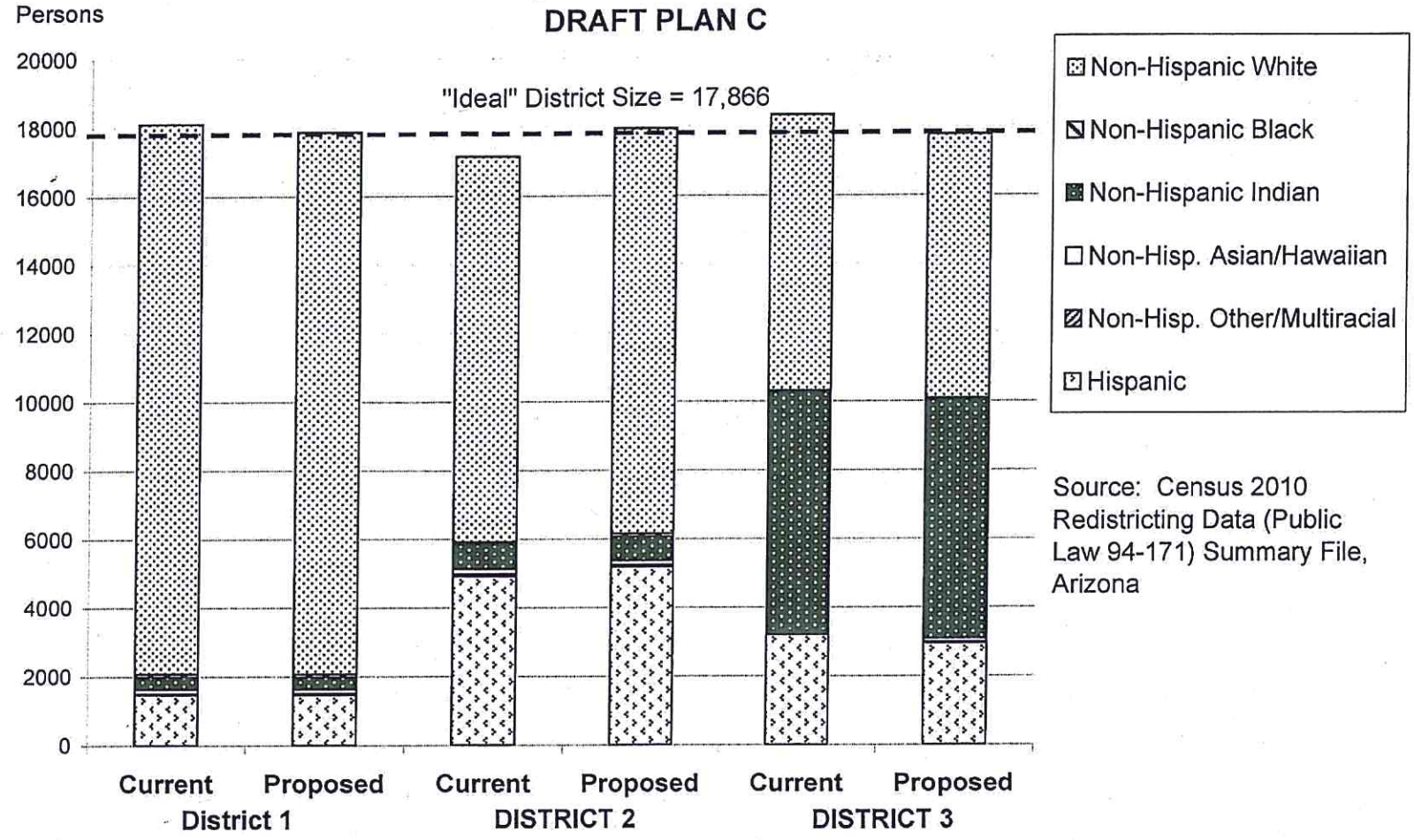
Source: Census 2010 Redistricting Data (Public Law 94-171) Summary file, Arizona
Tabulation: Research Advisory Services, Inc., Phoenix AZ (602) 230-9580

GILA COUNTY SUPERVISORIAL DISTRICTS
VOTING-AGE POPULATION BY RACE AND HISPANIC ORIGIN
DRAFT PLAN C

Voting-Age Number:	District 1	District 2	District 3	Total, All Districts
Hispanic, of any race	943	3,544	2,032	***6,519***
Non-Hispanic White	13,601	9,794	6,527	***29,922***
Non-Hispanic Black	46	69	56	***171***
Non-Hispanic American Indian	265	463	4,417	***5,145***
Non-Hispanic Asian	90	98	64	***252***
Non-Hispanic Hawaiian	17	8	5	***30***
Non-Hispanic other race	9	23	12	***44***
Non-Hispanic two or more races	11	15	17	***43***
Voting-Age Population	***14,982***	***14,014***	***13,130***	***42,126***
Voting-Age Percent:				
Hispanic, of any race	6.29%	25.29%	15.48%	***15.48%***
Non-Hispanic White	90.78%	69.89%	49.71%	***71.03%***
Non-Hispanic Black	0.31%	0.49%	0.43%	***0.41%***
Non-Hispanic American Indian	1.77%	3.30%	33.64%	***12.21%***
Non-Hispanic Asian	0.60%	0.70%	0.49%	***0.60%***
Non-Hispanic Hawaiian	0.11%	0.06%	0.04%	***0.07%***
Non-Hispanic other race	0.06%	0.16%	0.09%	***0.10%***
Non-Hispanic two or more races	0.07%	0.11%	0.13%	***0.10%***
Voting-Age Percent	***100.00%***	***100.00%***	***100.00%***	***100.00%***

Source: Census 2010 Redistricting Data (Public Law 94-171) Summary file, Arizona
Tabulation: Research Advisory Services, Inc., Phoenix AZ (602) 230-9580

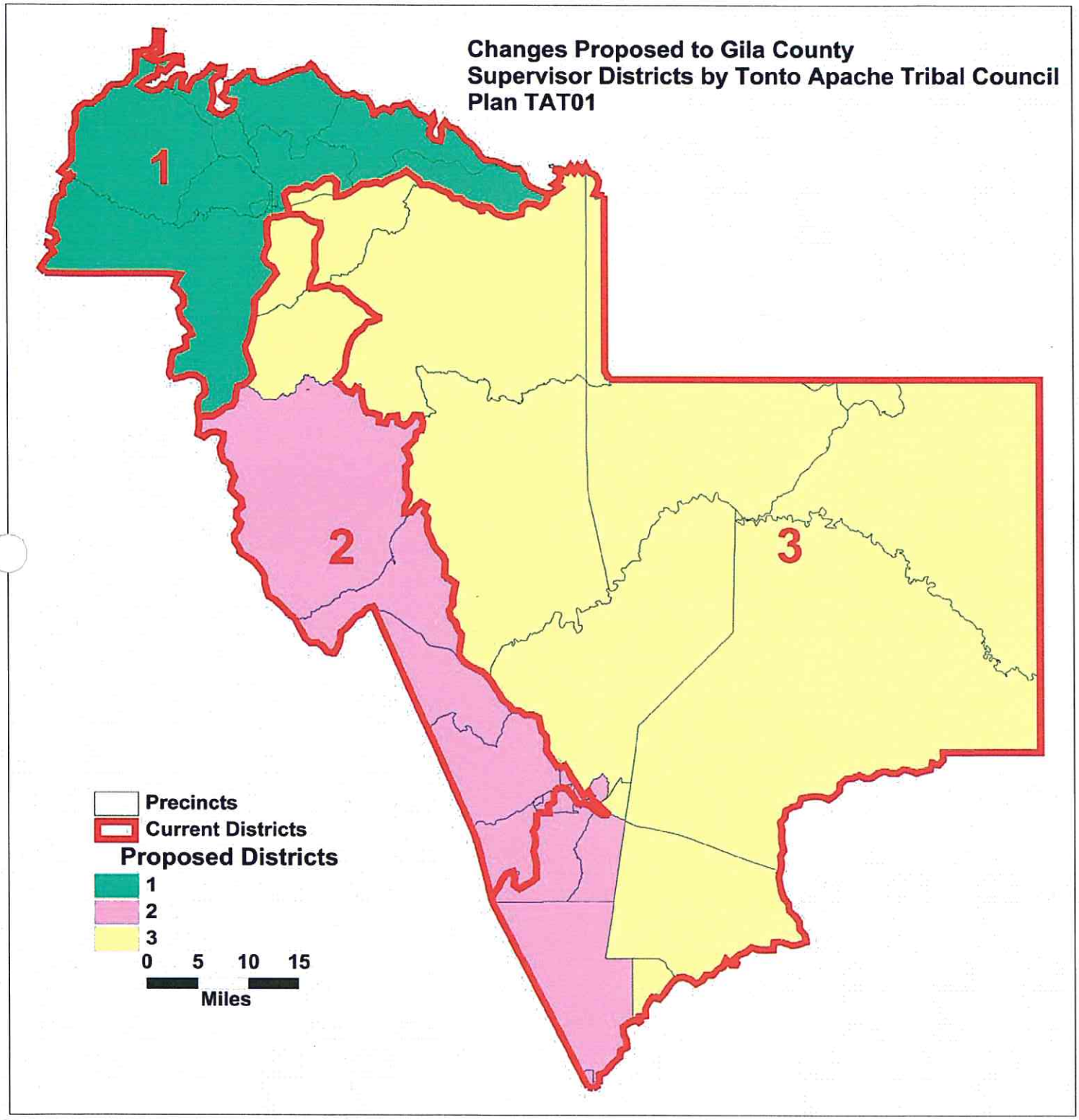
Race and Origin Composition of Current and Proposed Gila County Supervisorial Districts
DRAFT PLAN C



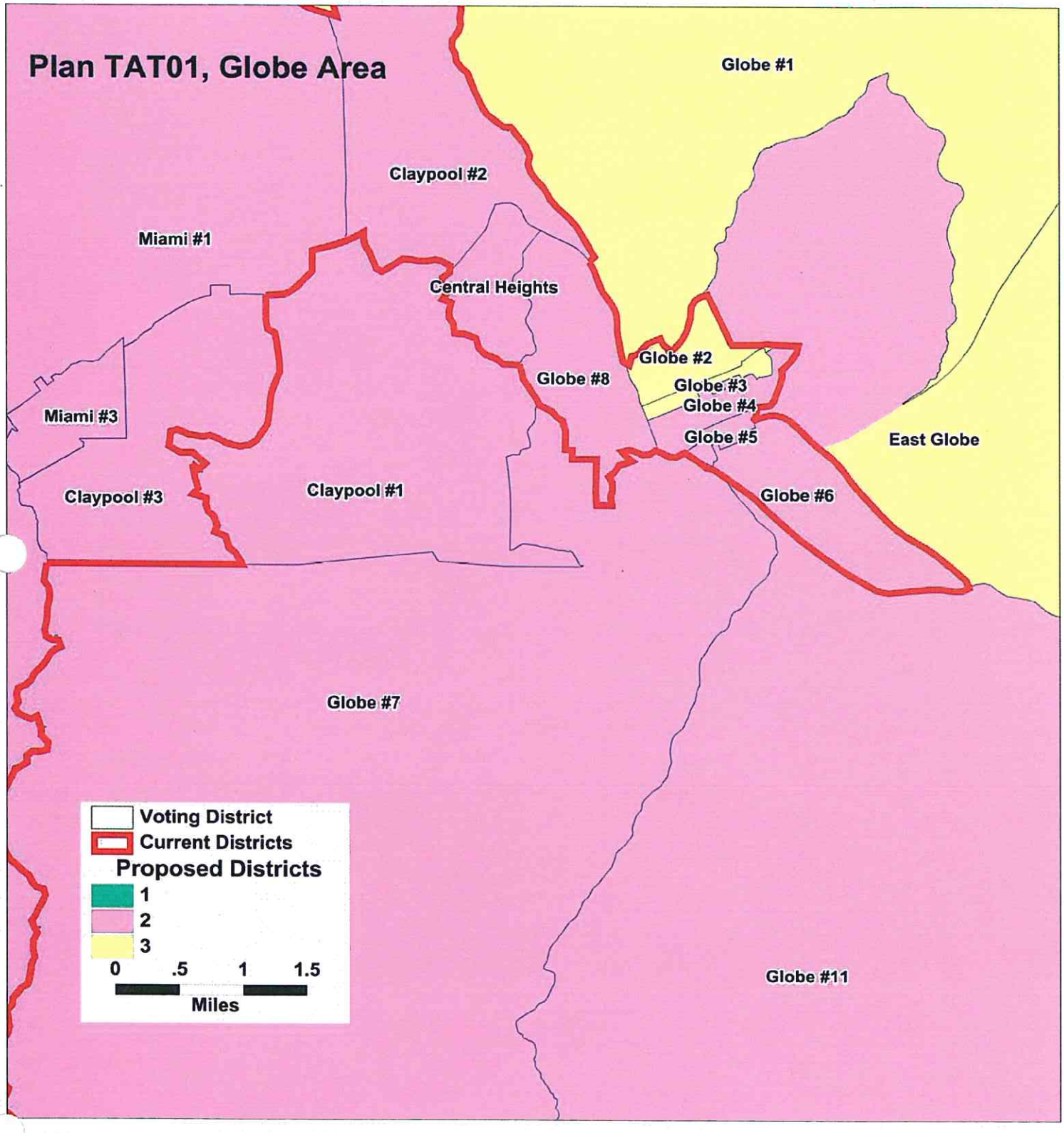
Source: Census 2010 Redistricting Data (Public Law 94-171) Summary File, Arizona

GILA COUNTY SUPERVISORIAL DISTRICTS
DRAFT PLAN C

	Current	Proposed Plan	Change
Population, District 1	18,105	17,870	-235
Population, District 2	17,151	17,955	804
Population, District 3	18,341	17,772	-569
Population deviation, District 1	239	4	
Population deviation, District 2	-715	89	
Population deviation, District 3	475	-94	
Percent deviation, District 1	1.34%	0.02%	
Percent deviation, District 2	-4.00%	0.50%	
Percent deviation, District 3	2.66%	-0.52%	
Total plan deviation, number	1,190	183	
Total plan deviation, percent	6.66%	1.02%	
Percent voting-age Hispanic, District 1	6.23%	6.29%	0.06%
Percent voting-age Hispanic, District 2	24.88%	25.29%	0.41%
Percent voting-age Hispanic, District 3	16.45%	15.48%	-0.97%
Percent V-A Non-Hispanic Native American, District 1	1.75%	1.77%	0.02%
Percent V-A Non-Hispanic Native American, District 2	3.63%	3.30%	-0.33%
Percent V-A Non-Hispanic Native American, District 3	32.77%	33.64%	0.87%
Percent V-A Non-Hispanic Black, District 1	0.31%	0.31%	0.00%
Percent V-A Non-Hispanic Black, District 2	0.46%	0.49%	0.03%
Percent V-A Non-Hispanic Black, District 3	0.46%	0.43%	-0.03%
Percent voting-age total minority residents, District 1	9.13%	9.22%	0.09%
Percent voting-age total minority residents, District 2	30.16%	30.11%	-0.05%
Percent voting-age total minority residents, District 3	50.28%	50.29%	0.01%


Changes Proposed to Gila County
Supervisor Districts by Tonto Apache Tribal Council
Plan TAT01
1
2
3
Precincts
Current Districts
Proposed Districts
1
2
3
0 5 10 15
Miles


Plan TAT01, Payson Area
Zane Grey
Pine-Strawberry
Payson #5
Payson #8
Payson #4
Payson #3
Payson #6
Star Valley
Payson #1
Payson #2
Young
Voting District
Current Districts
Proposed Districts
1
2
3
0
1
2
3
Miles


Plan TAT01, Globe Area
Globe #1
Claypool #2
Miami #1
Central Heights
Globe #2
Globe #8
Globe #3
Globe #4
Miami #3
Globe #5
East Globe
Claypool #3
Claypool #1
Globe #6
Globe #7
Globe #11
Voting District
Current Districts
Proposed Districts
1
2
3
0
.5
1
1.5
Miles

GILA COUNTY SUPERVISORIAL DISTRICTS
TOTAL POPULATION BY RACE AND HISPANIC ORIGIN
PLAN SUBMITTED BY: Tonto Apache Tribal Council, Plan TAT01

Number:	District 1	District 2	District 3	Total, All Districts
Hispanic, of any race	1,467	6,226	1,895	***9,588***
Non-Hispanic White	16,025	10,424	8,849	***35,298***
Non-Hispanic Black	87	96	65	***248***
Non-Hispanic American Indian	357	629	6,989	***7,975***
Non-Hispanic Asian	114	127	80	***321***
Non-Hispanic Hawaiian	22	11	6	***39***
Non-Hispanic other race	20	25	21	***66***
Non-Hispanic two or more races	13	24	25	***62***
Total Population	***18,105***	***17,562***	***17,930***	***53,597***
Percent:				
Hispanic, of any race	8.10%	35.45%	10.57%	***17.89%***
Non-Hispanic White	88.51%	59.36%	49.35%	***65.86%***
Non-Hispanic Black	0.48%	0.55%	0.36%	***0.46%***
Non-Hispanic American Indian	1.97%	3.58%	38.98%	***14.88%***
Non-Hispanic Asian	0.63%	0.72%	0.45%	***0.60%***
Non-Hispanic Hawaiian	0.12%	0.06%	0.03%	***0.07%***
Non-Hispanic other race	0.11%	0.14%	0.12%	***0.12%***
Non-Hispanic two or more races	0.07%	0.14%	0.14%	***0.12%***
Total Percent	***100.00%***	***100.00%***	***100.00%***	***100.00%***
Ideal Population	17,866	17,866	17,866	***Total***
Total Population	18,105	17,562	17,930	***deviation:***
Numeric deviation from Ideal Value	239	-304	64	***543***
Percent deviation from Ideal Value	1.34%	-1.70%	0.36%	***3.04%***

Source: Census 2010 Redistricting Data (Public Law 94-171) Summary file, Arizona
Tabulation: Research Advisory Services, Inc., Phoenix AZ (602) 230-9580

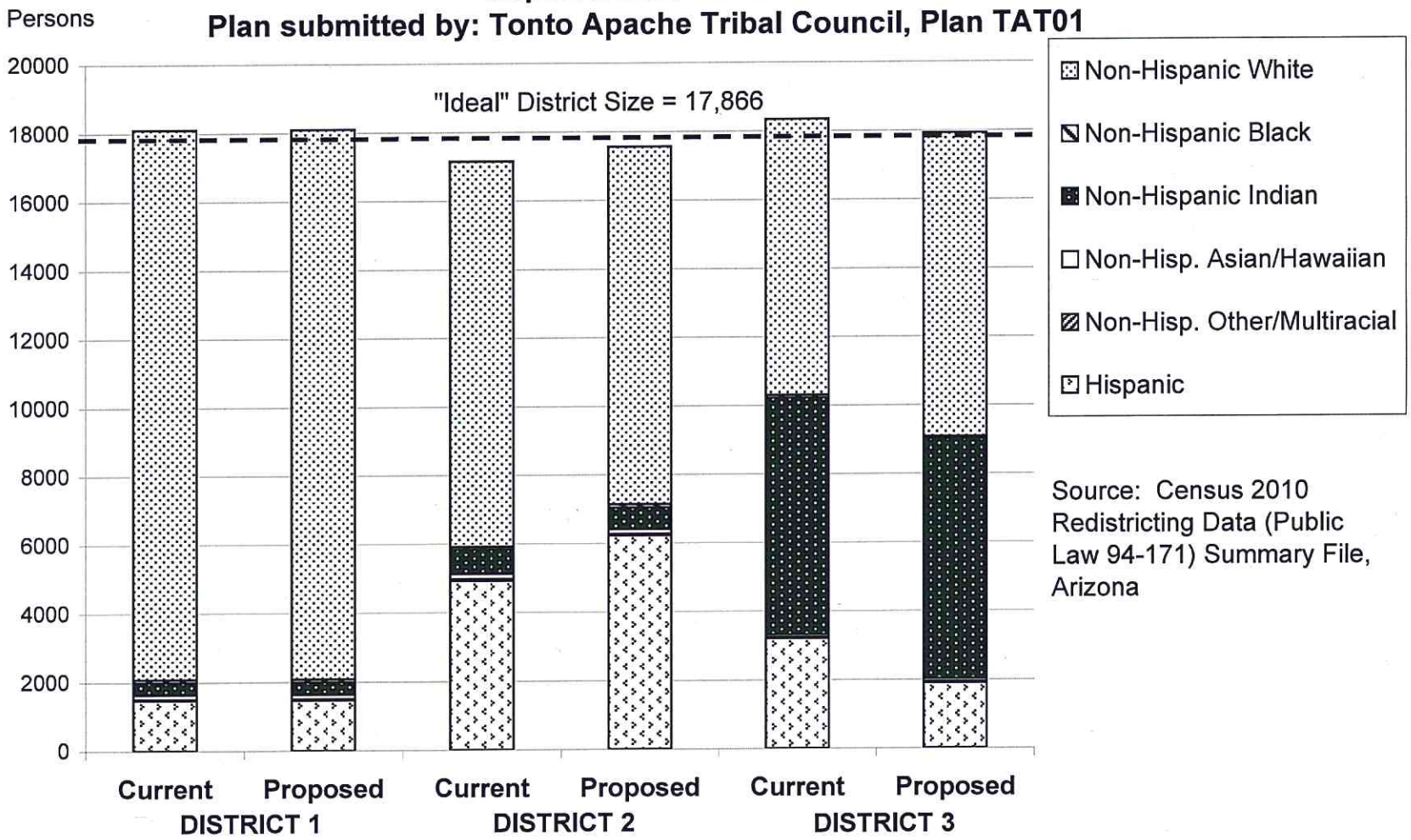
GILA COUNTY SUPERVISORIAL DISTRICTS
VOTING-AGE POPULATION BY RACE AND HISPANIC ORIGIN
PLAN SUBMITTED BY: Tonto Apache Tribal Council, Plan TAT01

Voting-Age Number:	District 1	District 2	District 3	Total, All Districts
Hispanic, of any race	947	4,331	1,241	***6,519***
Non-Hispanic White	13,806	8,643	7,473	***29,922***
Non-Hispanic Black	47	69	55	***171***
Non-Hispanic American Indian	266	422	4,457	***5,145***
Non-Hispanic Asian	90	103	59	***252***
Non-Hispanic Hawaiian	17	8	5	***30***
Non-Hispanic other race	9	18	17	***44***
Non-Hispanic two or more races	11	16	16	***43***
Voting-Age Population	***15,193***	***13,610***	***13,323***	***42,126***
Voting-Age Percent:				
Hispanic, of any race	6.23%	31.82%	9.31%	***15.48%***
Non-Hispanic White	90.87%	63.50%	56.09%	***71.03%***
Non-Hispanic Black	0.31%	0.51%	0.41%	***0.41%***
Non-Hispanic American Indian	1.75%	3.10%	33.45%	***12.21%***
Non-Hispanic Asian	0.59%	0.76%	0.44%	***0.60%***
Non-Hispanic Hawaiian	0.11%	0.06%	0.04%	***0.07%***
Non-Hispanic other race	0.06%	0.13%	0.13%	***0.10%***
Non-Hispanic two or more races	0.07%	0.12%	0.12%	***0.10%***
Voting-Age Percent	***100.00%***	***100.00%***	***100.00%***	***100.00%***

Source: Census 2010 Redistricting Data (Public Law 94-171) Summary file, Arizona
Tabulation: Research Advisory Services, Inc., Phoenix AZ (602) 230-9580

Race and Origin Composition of Current and Proposed Gila County Supervisorial Districts

Plan submitted by: Tonto Apache Tribal Council, Plan TAT01



Source: Census 2010 Redistricting Data (Public Law 94-171) Summary File, Arizona

GILA COUNTY SUPERVISORIAL DISTRICTS
PLAN SUBMITTED BY: Tonto Apache Tribal Council, Plan TAT01

	Current	Proposed Plan	Change
Population, District 1	18,105	18,105	0
Population, District 2	17,151	17,562	411
Population, District 3	18,341	17,930	-411
Population deviation, District 1	239	239	
Population deviation, District 2	-715	-304	
Population deviation, District 3	475	64	
Percent deviation, District 1	1.34%	1.34%	
Percent deviation, District 2	-4.00%	-1.70%	
Percent deviation, District 3	2.66%	0.36%	
Total plan deviation, number	1,190	543	
Total plan deviation, percent	6.66%	3.04%	
Percent voting-age Hispanic, District 1	6.23%	6.23%	0.00%
Percent voting-age Hispanic, District 2	24.88%	31.82%	6.94%
Percent voting-age Hispanic, District 3	16.45%	9.31%	-7.14%
Percent V-A Non-Hispanic Native American, District 1	1.75%	1.75%	0.00%
Percent V-A Non-Hispanic Native American, District 2	3.63%	3.10%	-0.53%
Percent V-A Non-Hispanic Native American, District 3	32.77%	33.45%	0.68%
Percent V-A Non-Hispanic Black, District 1	0.31%	0.31%	0.00%
Percent V-A Non-Hispanic Black, District 2	0.46%	0.51%	0.05%
Percent V-A Non-Hispanic Black, District 3	0.46%	0.41%	-0.05%
Percent voting-age total minority residents, District 1	9.13%	9.13%	0.00%
Percent voting-age total minority residents, District 2	30.16%	36.50%	6.34%
Percent voting-age total minority residents, District 3	50.28%	43.91%	-6.37%

Consultant's Review Comments:

This plan reduces the total population deviation by more than half, bringing the total deviation to just over 3%.

The 6 percentage point increase in voting-age minority proportion in District 2 bolsters that district's demonstrated ability to elect candidates favored by minority voters. Under this plan, the voting-age Native American proportion in District 3 also rises, but further analysis will be needed to determine whether District 3's minority populations will continue to be able to elect candidates of their choice. This plan has a lot of potential; a good starting point.

Eastlick, Linda

From: Bruce Adelson [badelson1@comcast.net]
Sent: Thursday, September 01, 2011 8:52 PM
To: Eastlick, Linda
Cc: tsissons@researchadvisoryservices.com
Subject: BOS Maps and Data
Attachments: DraftPlan_A_Maps.pdf; DraftPlan_A_Report.pdf; DraftPlan_B_Maps.pdf; DraftPlan_B_Report.pdf; DraftPlan_C_Maps.pdf; DraftPlan_C_Report.pdf

Linda:

We have attached the three draft plans for BOS redistricting, labeled A,B, and C. Plan A is the revised Tonto Apache Plan.

In choosing among these plans, it is important to understand the Section 5 prohibition of retrogression, which is the weakening or diminishing of minority voters opportunity/ability to elect candidates of their choice. AS DOJ acknowledges, "That ability to elect either exists or it does not in any particular circumstance." See: Department of Justice, Guidance Concerning Redistricting Under Section 5 of the Voting Rights Act, Federal Register Vol. 76, No., 27, at 7471, February 9, 2011.

As you know, we have determined that BOS District 2 and 3 minority voters have demonstrated the ability to elect candidates of their choice. Pursuant to federal law, that ability, once determined to exist, cannot be diminished or weakened.

In its Section 5 analysis, DOJ will examine the benchmark BOS plan, the one DOJ precleared during the previous Census, and compare it to the one proposed. Under the benchmark plan, one Gila County BOS district is a majority-minority district, District 3. To avoid legally prohibited retrogression, one BOS district MUST remain majority-minority, as BOS District 3 does in all proposed plans. In its Section 5 analysis, DOJ will determine whether the proposed redistricting plan is retrogressive in purpose or effect. The presence of ANY amount of retrogression will result in DOJ denying Gila County preclearance of its redistricting plan.

See: above and 28 C.F.R. 51.54 a-d :

Discriminatory effect. A change affecting voting is considered to have a discriminatory effect under section 5 if it will lead to a retrogression in the position of members of a racial or language minority group (*i.e.,* will make members of such a group worse off than they had been before the change) with respect to their effective exercise of the electoral franchise. *Beer* v. *United States,* 425 U.S. 130, 140–42 (1976) and *Protection of the ability to elect.* Any change affecting voting that has the purpose of or will have the effect of diminishing the ability of any citizens of the United States on account of race, color, or membership in a language minority group to elect their preferred candidates of choice denies or abridges the right to vote within the meaning of section 5. 42 U.S.C. 1973c.
See: 28 C.F.R. 51.54 d.

The retrogression standard also has an intent, or purpose, element:

§ 51.54 Discriminatory purpose and effect. (a) *Discriminatory purpose.* A change affecting voting is considered to have a discriminatory purpose under section 5 if it is enacted or sought to be administered with any purpose of denying or abridging the right to vote on account of race, color, or membership in a language minority group. The term ''purpose'' in section 5 includes any discriminatory purpose. See: 28 C.F.R. 51.54 a.

As directed by the BOS, we have revised the Tonto Apache plan and restored Latino voting strength to BOS District 3. This restoration is necessary to avoid retrogression to the ability of District 3 voters to elect their candidates of choice. District 3 is a coalition district, where no single minority group is an absolute numerical majority. In coalition districts,

the ability of minority voters to elect candidates of choice depends upon their coalescing with one or more groups of voters to support many of the same winning candidates, as most District 3 Latino and Native American voters have done. District 2 is also a coalition district. The same factors apply to District 2 as they do for District 3.

Minority voters' ability to elect candidates of choice is arguably more fragile in a coalition district, where their ability to elect candidates of choice depends upon two or more groups or coalitions of voters, than this ability would be in districts with absolute majorities of one minority group. Therefore, to prevent retrogression to District 3 minority voters' federally protected rights, we have restored Latino population to this district.

Tony has not altered Draft Plans B and C from what was presented to the BOS by the Redistricting Advisory Committee.

We appreciate that these maps are not final products. It is important to understand, however, that changes to the plans may be needed before DOJ submission. In addition, changes may be proposed by the BOS or by County residents after the proposed plans are made available for public comment.

Minority voters (mostly Latinos) in District 2, with a lower minority population than in District 3, have a more tenuous ability to elect candidates of choice than their District 3 counterparts. Over the next decade, Gila County and District 2 may suffer continuing economic uncertainty, which could impact future voting behavior, voter turnout, and voter registration. DOJ takes these additional factors into account in its Section 5 retrogression analysis.

Although comparison of the census population of districts in the benchmark and proposed plans is the important starting point of any Section 5 analysis, additional demographic and election data in the submission is often helpful in making the requisite Section 5 determination. 28 CFR 51.28(a). For example, census population data may not reflect significant differences in group voting behavior. Therefore, election history and voting patterns within the jurisdiction, voter registration and turnout information, and other similar information are very important to an assessment of the actual effect of a redistricting plan. See: Department of Justice, Guidance Concerning Redistricting nder Section 5 of the Voting Rights Act, Federal Register Vol. 76, No., 27, at 7471, February 9, 2011.

Over the next few years, if District 2's Latino voting age population declines, even slightly, retrogression may well occur. Therefore, it is important, if possible without violating the Constitution's one person, one standard, the Voting Rights Act, and other non-competing redistricting principles, for the County to consider raising District 2's Latino voting age population by more (e.g., 2 %) than the proposed plans provide. I recommend that the BOS consider this issue before choosing a BOS redistricting plan for final adoption.

Sincerely,

Bruce L. Adelson, Esq.
Federal Compliance Consulting LLC
11808 Becket Street
Potomac, MD 20854
301-762-5272
240-536-9192 fax