

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS,
MARSHALL DIVISION**

LEAGUE OF UNITED LATIN	§	
AMERICAN CITIZENS, ET AL.	§	
vs.	§	CIVIL NO. 2:03-CV-354
	§	CONSOLIDATED
RICK PERRY, GOVERNOR OF TEXAS,	§	
ET AL.	§	

**MEMORANDUM OF INTERVENORS
BONILLA AND SMITH REGARDING
AMENDED BIPARTISAN COMPROMISE PLAN**

Congressmen Henry Bonilla and Lamar Smith, Intervenors herein, state the following regarding Plan 1425C, the Amended Bipartisan Congressional Compromise Plan that was posted on RedAppl last week:

I.

Intervenors Bonilla and Smith submitted Plan 1422C, the original Bipartisan Congressional Compromise Plan, to this Court on July 14, 2006. Thereafter, the drawers of that plan realized that, in the process of bringing its population deviation to zero, they had unintentionally changed certain lines in Sutton County, thus moving a few people out District 11. They also found they erroneously had moved fewer than ten census blocks from District 20 into District 23.

II.

The Amended Bipartisan Congressional Compromise Plan, Plan 1425C, corrects these errors. It was made available on RedAppl and RedViewer shortly after the original filing was made with this Court. It does not affect Congressional District 11 or Congressional District 20. Instead, they retain their existing configurations. The Amended Bipartisan Congressional Plan thus affects only five congressional districts, which was the intent of the map drawers all along.

III.

Because the changes involved small areas, measured at the census tract level, the differences between Plan 1422C and Plan 1425C are very slight. To illustrate that fact, copies of portions of the two plans showing the affected areas are attached as Exhibits A, B, C, and D. Exhibits A (a portion of Plan 1422C) and B (a portion of Plan 1425C) show the change in the line between the 11th and 23rd Congressional Districts. Exhibits C and D depict the configurations of the 20th Congressional District in, respectively, Plan 1422C and Plan 1425C.

IV.

Attached hereto as Exhibit E is a copy of the statistical reports pertaining to Plan 1425C, which were taken from the RedViewer web site.

V.

The Jackson Plaintiffs have suggested in their briefing that Plan 1425C should not be considered because it was not filed by the Court's deadline. Since Plan 1425C corrects errors in the originally submitted Bipartisan Congressional Compromise plan and changes very little therein, Intervenors Bonilla and Smith ask the Court to consider the Amended Bipartisan Congressional Compromise in the remedial phase of this matter.

Respectfully submitted,




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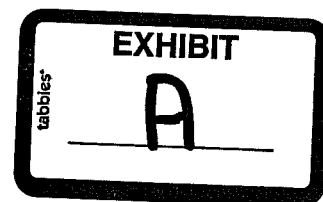
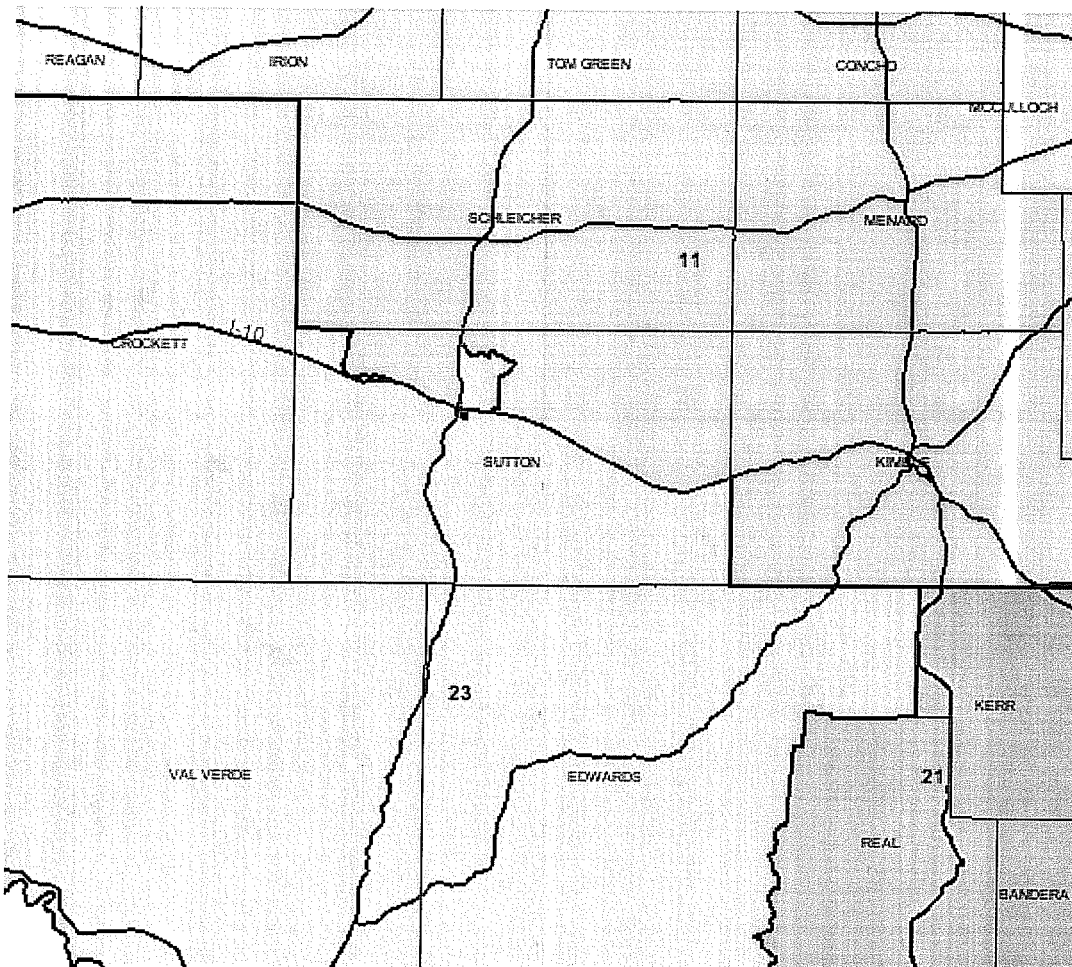
ATTORNEYS FOR INTERVENORS

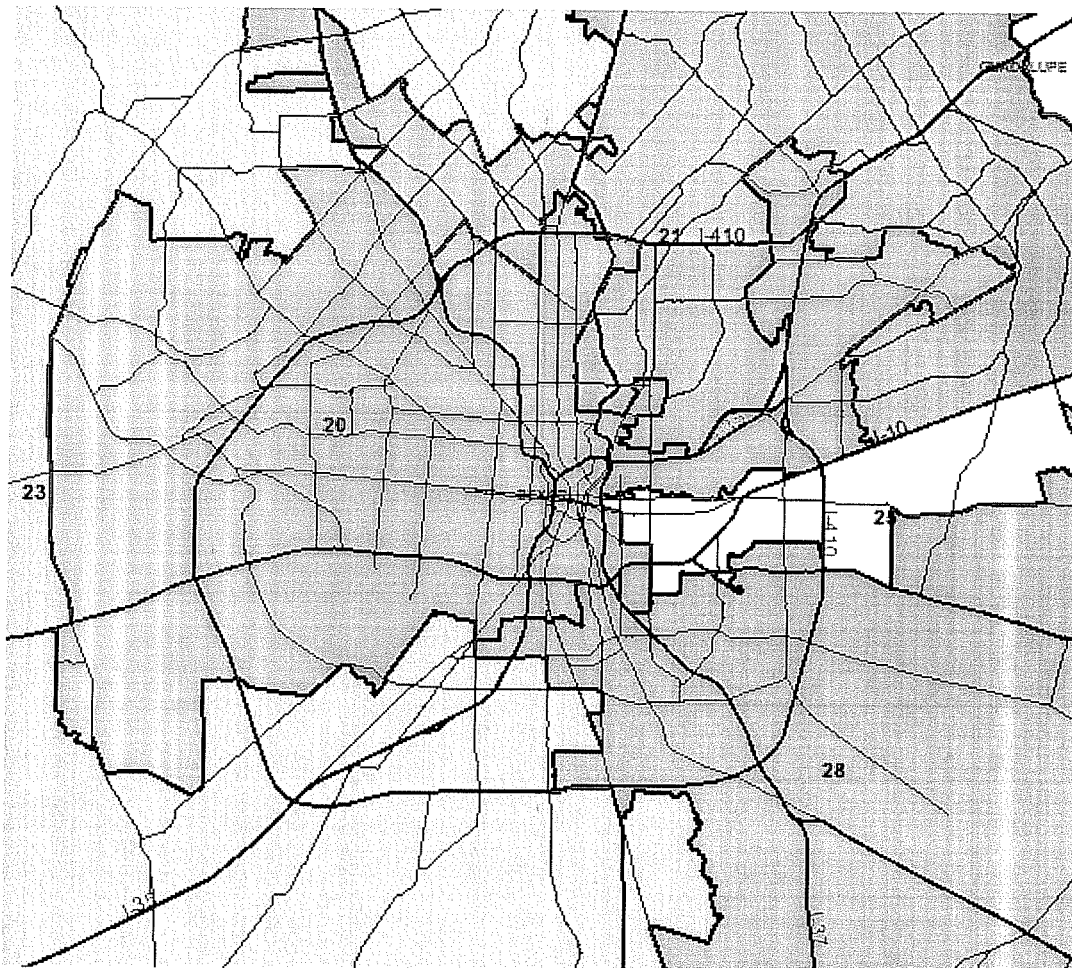
CERTIFICATE OF SERVICE

This is to certify that on the 25th day of July, 2006, a true and correct copy of the foregoing document was served on the following counsel of record via electronic mail:

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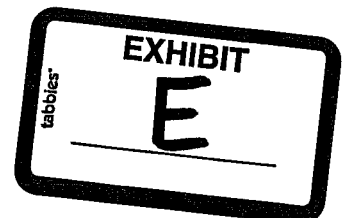


-----2000 CENSUS POPULATION-----

Total State Population			20,851,820	
Total Districts Required			32	
Ideal District Population			651,619	
Unassigned Population			17,593,723	
Districts in Plan			5	

	---Population---	-----Deviation-----	
		Total	Percent
Plan Overall Range		1	0.00%
Smallest District (15)	651,619	0	0.00%
Largest District (23)	651,620	1	0.00%
Average (mean)	651,619	0	0.00%

PLAN 01425C



POPULATION ANALYSIS WITH COUNTY SUBTOTALS
CONGRESSIONAL DISTRICTS - PLAN 01425C

		-----2000 CENSUS POPULATION-----											
	DEVIATION	TOTAL	ANGLO	BLACK	HISP	B+H	OTHER	%A	%B	%H	%BH	%O	
DIST 15	0	Total:	651,619	122,624	10,934	512,796	522,139	6,856	18.8	1.7	78.7	80.1	1.1
	(0.00%)	VAP:	442,003	100,490	8,423	329,004	336,616	4,897	22.7	1.9	74.4	76.2	1.1
Bee (100%)			32,359	11,352	3,263	17,450	20,622	385	35.1	10.1	53.9	63.7	1.2
Brooks (100%)			7,976	633	24	7,304	7,309	34	7.9	0.3	91.6	91.6	0.4
Cameron (26%)			87,317	20,888	799	64,871	65,403	1,026	23.9	0.9	74.3	74.9	1.2
De Witt (100%)			20,013	12,168	2,265	5,452	7,647	198	60.8	11.3	27.2	38.2	1.0
Goliad (100%)			6,928	4,115	349	2,439	2,764	49	59.4	5.0	35.2	39.9	0.7
Hidalgo (74%)			420,753	52,716	2,863	361,648	363,593	4,444	12.5	0.7	86.0	86.4	1.1
Jim Wells (100%)			39,326	9,001	280	29,772	29,962	363	22.9	0.7	75.7	76.2	0.9
Refugio (100%)			7,828	3,703	545	3,490	4,024	101	47.3	7.0	44.6	51.4	1.3
San Patricio (43%)			29,119	8,048	546	20,370	20,815	256	27.6	1.9	70.0	71.5	0.9
DIST 21	0	Total:	651,619	470,854	31,000	124,706	153,945	26,820	72.3	4.8	19.1	23.6	4.1
	(0.00%)	VAP:	489,333	365,897	20,310	83,841	103,331	20,105	74.8	4.2	17.1	21.1	4.1
Bandera (100%)			17,645	14,833	81	2,384	2,449	363	84.1	0.5	13.5	13.9	2.1
Bexar (22%)			303,037	184,078	26,176	81,889	106,627	12,332	60.7	8.6	27.0	35.2	4.1
Blanco (100%)			8,418	6,912	74	1,290	1,361	145	82.1	0.9	15.3	16.2	1.7
Comal (82%)			63,971	52,727	636	9,618	10,188	1,056	82.4	1.0	15.0	15.9	1.7
Hays (41%)			40,464	34,731	392	4,594	4,956	777	85.8	1.0	11.4	12.2	1.9
Kendall (100%)			23,743	19,104	113	4,248	4,331	308	80.5	0.5	17.9	18.2	1.3
Kerr (100%)			43,653	33,802	850	8,353	9,138	713	77.4	1.9	19.1	20.9	1.6
Real (100%)			3,047	2,306	10	688	695	46	75.7	0.3	22.6	22.8	1.5
Travis (18%)			147,641	122,361	2,668	11,642	14,200	11,080	82.9	1.8	7.9	9.6	7.5
DIST 23	1	Total:	651,620	200,655	12,838	427,592	438,692	12,273	30.8	2.0	65.6	67.3	1.9
	(0.00%)	VAP:	444,906	152,621	8,976	275,439	283,611	8,674	34.3	2.0	61.9	63.7	1.9
Bexar (20%)			277,527	123,933	7,782	138,737	145,744	7,850	44.7	2.8	50.0	52.5	2.8
Brewster (100%)			8,866	4,710	138	3,867	3,967	189	53.1	1.6	43.6	44.7	2.1
Crockett (100%)			4,099	1,792	36	2,242	2,266	41	43.7	0.9	54.7	55.3	1.0
Culberson (100%)			2,975	733	22	2,149	2,168	74	24.6	0.7	72.2	72.9	2.5
Dimmit (100%)			10,248	1,350	114	8,708	8,784	114	13.2	1.1	85.0	85.7	1.1
Edwards (100%)			2,162	1,161	30	974	977	24	53.7	1.4	45.1	45.2	1.1
El Paso (4%)			28,003	2,257	184	25,512	25,612	134	8.1	0.7	91.1	91.5	0.5
Frio (100%)			16,252	3,344	815	11,987	12,766	142	20.6	5.0	73.8	78.6	0.9
Hudspeth (100%)			3,344	770	12	2,509	2,516	58	23.0	0.4	75.0	75.2	1.7
Jeff Davis (100%)			2,207	1,376	26	783	801	30	62.3	1.2	35.5	36.3	1.4
Kinney (100%)			3,379	1,587	67	1,707	1,754	38	47.0	2.0	50.5	51.9	1.1
Maverick (100%)			47,297	1,610	193	44,938	44,997	690	3.4	0.4	95.0	95.1	1.5
Medina (100%)			39,304	19,919	947	17,873	18,723	662	50.7	2.4	45.5	47.6	1.7
Pecos (100%)			16,809	5,607	756	10,262	10,969	233	33.4	4.5	61.1	65.3	1.4
Presidio (100%)			7,304	1,079	27	6,162	6,177	48	14.8	0.4	84.4	84.6	0.7
Reeves (100%)			13,137	3,131	295	9,640	9,893	113	23.8	2.2	73.4	75.3	0.9
Sutton (69%)			2,816	1,067	11	1,722	1,729	20	37.9	0.4	61.2	61.4	0.7
Terrell (100%)			1,081	529	0	525	525	27	48.9	0.0	48.6	48.6	2.5
Uvalde (100%)			25,926	8,471	140	17,089	17,182	273	32.7	0.5	65.9	66.3	1.1
Val Verde (100%)			44,856	9,734	779	33,849	34,511	611	21.7	1.7	75.5	76.9	1.4
Webb (43%)			82,428	5,571	400	75,775	76,003	854	6.8	0.5	91.9	92.2	1.0
Zavala (100%)			11,600	924	64	10,582	10,628	48	8.0	0.6	91.2	91.6	0.4
DIST 25	1	Total:	651,620	299,014	80,156	253,794	330,656	21,950	45.9	12.3	38.9	50.7	3.4
	(0.00%)	VAP:	486,275	245,920	56,156	167,771	222,282	18,073	50.6	11.5	34.5	45.7	3.7
Bastrop (65%)			37,342	25,437	3,505	7,814	11,200	705	68.1	9.4	20.9	30.0	1.9
Bexar (3%)			38,248	5,228	15,311	17,653	32,616	404	13.7	40.0	46.2	85.3	1.1
Caldwell (100%)			32,194	15,929	2,877	13,018	15,787	478	49.5	8.9	40.4	49.0	1.5
Comal (18%)			14,050	5,618	273	7,991	8,225	207	40.0	1.9	56.9	58.5	1.5
Guadalupe (100%)			89,023	52,858	4,825	29,561	34,142	2,023	59.4	5.4	33.2	38.4	2.3
Hays (59%)			57,125	28,214	3,555	24,265	27,585	1,326	49.4	6.2	42.5	48.3	2.3
Travis (47%)			383,638	165,730	49,810	153,492	201,101	16,807	43.2	13.0	40.0	52.4	4.4

		-----2000 CENSUS POPULATION-----											
	DEVIATION	TOTAL	ANGLO	BLACK	HISP	B+H	OTHER	%A	%B	%H	%BH	%O	
DIST 28	0	Total:	651,619	151,716	21,365	475,779	495,231	4,672	23.3	3.3	73.0	76.0	0.7
	(0.00%)	VAP:	434,356	119,216	15,001	297,780	311,806	3,334	27.4	3.5	68.6	71.8	0.8
Atascosa (100%)			38,628	15,284	286	22,620	22,828	516	39.6	0.7	58.6	59.1	1.3
Bexar (9%)			122,500	30,549	9,499	81,489	90,464	1,487	24.9	7.8	66.5	73.8	1.2
Colorado (100%)			20,390	13,165	3,075	4,024	7,033	192	64.6	15.1	19.7	34.5	0.9
Duval (100%)			13,120	1,452	81	11,544	11,603	65	11.1	0.6	88.0	88.4	0.5
Fayette (100%)			21,804	17,271	1,562	2,786	4,312	221	79.2	7.2	12.8	19.8	1.0
Gonzales (100%)			18,628	9,539	1,641	7,381	8,920	169	51.2	8.8	39.6	47.9	0.9
Hidalgo (26%)			148,710	6,707	464	141,452	141,592	411	4.5	0.3	95.1	95.2	0.3
Jim Hogg (100%)			5,281	474	28	4,752	4,777	30	9.0	0.5	90.0	90.5	0.6
Karnes (100%)			15,446	6,309	1,717	7,324	8,953	184	40.8	11.1	47.4	58.0	1.2
La Salle (100%)			5,866	1,114	211	4,524	4,718	34	19.0	3.6	77.1	80.4	0.6
Lavaca (100%)			19,210	15,579	1,357	2,183	3,502	129	81.1	7.1	11.4	18.2	0.7
Live Oak (100%)			12,309	7,199	306	4,683	4,966	144	58.5	2.5	38.0	40.3	1.2
McMullen (100%)			851	556	10	282	292	3	65.3	1.2	33.1	34.3	0.4
Starr (100%)			53,597	1,082	102	52,278	52,285	230	2.0	0.2	97.5	97.6	0.4
Webb (57%)			110,689	3,937	513	106,295	106,398	354	3.6	0.5	96.0	96.1	0.3
Wilson (100%)			32,408	19,728	454	11,834	12,238	442	60.9	1.4	36.5	37.8	1.4
Zapata (100%)			12,182	1,771	59	10,328	10,350	61	14.5	0.5	84.8	85.0	0.5

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 Data: 2000 Census
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POPULATION AND GENERAL ELECTION HISTORY
 CONGRESSIONAL DISTRICTS - PLAN 01425C

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PLAN 01425C DIST	2000 CENSUS										GENERAL ELECTION HISTORY*				STATEWIDES**				
	DEVIATION	TOTAL	ANGLO	BLACK	HISP	B+H	OTHER	%A	%B	%H	%B+H	%O	-YEAR-	-VOTER REG-	TURNOUT	TOTAL	TO/VR	%DEM	%REP
15	0 (0.00%)	651,619	122,624	10,934	512,796	522,139	6,856	18.8	1.7	78.7	80.1	1.1	2004	311,170	160,410	51.6%	54.6	44.1	55.9
		442,003	100,490	8,423	329,004	336,616	4,897	22.7	1.9	74.4	76.2	1.1	2002	299,804	106,026	35.4%	61.8	33.9	66.1
21	0 (0.00%)	651,619	470,854	31,000	124,706	153,945	26,820	72.3	4.8	19.1	23.6	4.1	2004	443,606	341,658	77.0%	34.2	65.8	34.2
		489,333	365,897	20,310	83,841	103,331	20,105	74.8	4.2	17.1	21.1	4.1	2002	401,714	210,890	52.5%	30.9	69.1	30.9
23	+1 (+0.00%)	651,620	200,655	12,838	427,592	438,692	12,273	30.8	2.0	65.6	67.3	1.9	2004	377,759	230,552	61.0%	43.5	56.5	43.5
		444,906	152,621	8,976	275,439	283,611	8,674	34.3	2.0	61.9	63.7	1.9	2002	349,155	148,008	42.4%	50.4	49.6	50.4
25	+1 (+0.00%)	651,620	299,014	80,156	253,794	330,656	21,950	45.9	12.3	38.9	50.7	3.4	2004	351,059	242,634	69.1%	58.6	41.4	58.6
		486,275	245,920	56,156	167,771	222,282	18,073	50.6	11.5	34.5	45.7	3.7	2002	316,011	140,675	44.5%	57.3	42.7	57.3
28	0 (0.00%)	651,619	151,716	21,365	475,779	495,231	4,672	23.3	3.3	73.0	76.0	0.7	2004	310,548	163,569	52.7%	54.2	45.8	54.2
		434,356	119,216	15,001	297,780	311,806	3,334	27.4	3.5	68.6	71.8	0.8	2002	299,416	115,649	38.6%	62.1	37.9	62.1

* Texas Legislative Council reports generally do not include results from third party, independent, or write-in candidates. Complete official results are maintained by the office of the secretary of state.
 ** "Statewides" is a weighted average of the results of all general election statewide contested contests.