

348-367889-25

Case No. \_\_\_\_\_

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|--|---|---------------------------------|
| <b>LEAGUE OF UNITED LATIN</b>            | § | <b>IN THE DISTRICT COURT OF</b> |
| <b>AMERICAN CITIZENS OF FORT</b>         | § |                                 |
| <b>WORTH, COUNCIL 4568, and</b>          | § | <b>TARRANT COUNTY, TEXAS</b>    |
| <b>LEAGUE OF WOMEN VOTERS OF</b>         | § |                                 |
| <b>TARRANT COUNTY,</b>                   | § | <b>__ JUDICIAL DISTRICT</b>     |
| <i>Plaintiffs,</i>                       | § |                                 |
|  | § |                                 |
| <b>v.</b>                                | § |                                 |
|  | § |                                 |
| <b>TARRANT COUNTY, TARRANT</b>           | § |                                 |
| <b>COUNTY COMMISSIONERS</b>              | § |                                 |
| <b>COURT, and COUNTY JUDGE TIM</b>       | § |                                 |
| <b>O’HARE, in his official capacity,</b> | § |                                 |
| <i>Defendants.</i>                       | § |                                 |

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**PLAINTIFFS’ ORIGINAL VERIFIED PETITION**

Plaintiffs League of United Latin American Citizens of Fort Worth, Council 4568 and League of Women Voters of Tarrant County (collectively, “Plaintiffs”) bring this action against Tarrant County, the Tarrant County Commissioners Court (the “Commissioners Court”), and Tarrant County Judge Tim O’Hare, in his official capacity, (collectively, “Defendants”) seeking declaratory and injunctive relief under the Texas Open Meetings Act; Article V, Section 18 of the Texas Constitution; Section 106.001 of the Texas Civil Practice and Remedies Code; and Article I, Sections 3 and 3a of the Texas Constitution. In support of such relief, Plaintiffs respectfully show the Court the following:

1. On June 3, 2025, in a contentious 3–2 vote, the Commissioners Court adopted an electoral map that eliminated one of the two existing majority-minority commissioner precincts and destroyed the ability for minority communities to elect the candidates of their choice. The map also disproportionately disenfranchised over 45,000 Black residents of voting age and over 44,000 Latino residents of voting age in Tarrant County who would otherwise have been able to vote for

a commissioner candidate in the November 2026 election by moving them to a precinct with commissioner elections not scheduled until 2028.

2. The June 3 vote represented the culmination of a series of events orchestrated by Defendant O’Hare and the Commissioners Court to impose an unfair, arbitrary, and discriminatory commissioners precinct redistricting plan. This unprecedented, mid-decade plan had no reasonable basis in fact or law and was enacted through a process that deviated significantly from the more transparent, participatory redistricting procedures used by the Commissioners Court in 2011 and 2021.

3. For example, in 2021, the Commissioners Court conducted a full redistricting review of its commissioner precincts based on explicitly adopted criteria.<sup>1</sup> The County’s massive population growth was evenly distributed, with less than two percent deviation in population among all four commissioner precincts. The majority-Republican and majority-non-Hispanic white (“Anglo”) Commissioners Court thus voted to retain the existing electoral map until the 2030 Census (“the Original Map”).

4. Despite that, on April 2, 2025, the current Commissioners Court, led by Defendant O’Hare, voted 3–2 to engage in a redistricting of the County’s commissioner precincts. In doing so, they ignored the 2021 public redistricting criteria, including contiguity and compactness,

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<sup>1</sup> The 2021 criteria required any new map to:

- (1) follow “easily identifiable geographic boundaries”;
- (2) maintain “communities of interest” in a single commissioner precinct and “avoid splitting neighborhoods”;
- (3) avoid the splitting of voting precincts in a way that creates practical election administration issues, as well as avoid splitting census blocks;
- (4) base any new map on “existing commissioner precincts”;
- (5) have an overall population deviation that does not exceed 10 percent;
- (6) have compact and contiguous precincts, both functionally and geographically;
- (7) give consideration to preserving “incumbent-constituency relations”;
- (8) “avoid racial gerrymandering”; and
- (9) not “fragment[ing] a geographically compact minority community or pack[ing] minority voters in the presence of polarized voting or otherwise discriminat[ing] against protected groups so as to create liability under the Voting Rights Act.”

Order Adopting Criteria For Use in 2021 Redistricting Process (Sep. 28, 2021).

adherence to geographical boundaries, preservation of communities and minority populations, and fidelity to state and federal law.

5. There was no new census data or apparent triggering event to justify this abrupt decision. While the announced rationales for the redistricting included the desire to address purported precinct population deviations and to entrench partisan control, there is neither evidence for large population deviations nor a logical reason to require 0 percent deviation based on 2020 Census data, and partisan motivation alone cannot result in legal redistricting, especially given evidence of intentional racial discrimination.

6. That same day, and to aid in executing this redistricting plan, the Commissioners Court voted to retain a firm hand-selected by Defendant O'Hare: the Public Interest Legal Foundation ("PILF"). PILF is a Virginia-based firm currently defending Galveston County in an ongoing redistricting lawsuit over minority vote dilution and racial gerrymandering. Its services to the Commissioners Court included providing legal advice and drawing potential maps.<sup>2</sup>

7. With PILF's aid, the redistricting process proceeded rapidly and behind closed doors. It deviated starkly from the 2021 review process by not providing publicly adopted redistricting criteria or public drawing sessions.

8. Only one month later, on May 2, PILF submitted five proposed maps to the Commissioners Court, which were then released to the public. These maps largely fractured minority communities in the County and turned the two majority-minority precincts in the south of the County into contorted jigsaw puzzle pieces, while making less dramatic changes to the northern part of the County.

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<sup>2</sup> Public Interest Legal Foundation Legal Services Agreement With Tarrant County (Apr. 2, 2025).

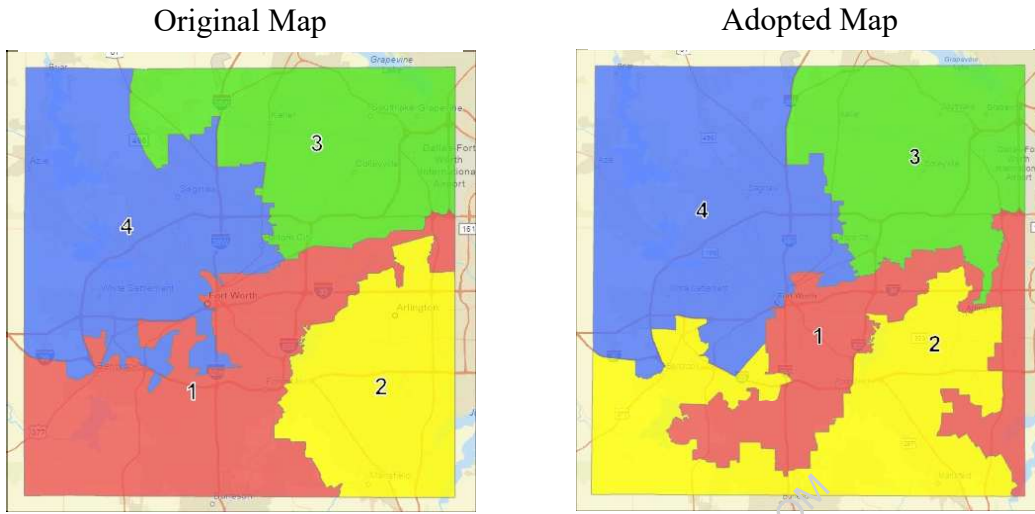
9. Public outcry was swift, with hundreds of County residents expressing their outrage at the apparent discrimination against Black and Latino voters. In several public hearings, County residents questioned the rushed timeline, the lack of voted-on public criteria, the lack of consideration for community-created maps, and the discriminatory motivation and impact of the proposed maps.

10. Despite those community hearings, on May 29 and May 30, PILF and the Commissioners Court released a sixth and seventh proposed map, only days before the June 3 final vote. These eleventh-hour maps were not responsive to the concerns those in majority-minority Precincts 1 and 2 raised during the community hearings—suggesting an attempt to deny residents, particularly Black and Latino voters, a voice in the process. Even so, residents quickly mobilized and showed up in force on the day of the June 3 vote to voice their profuse opposition to the redistricting.

11. Nonetheless, and over overwhelmingly negative feedback from the most impacted communities and the objections of its two Black Commissioners from Precincts 1 and 2, the Commissioners Court adopted the seventh proposed map (“the Adopted Map” or “the Adopted Map 7”) in a 3–2 vote on June 3, 2025. Among its many changes, the Adopted Map eliminated Precinct 2 as a majority-minority precinct.

12. Image 1 below shows the Original Map compared to the Adopted Map 7 created by PILF, as posted on the Tarrant County website.

*Image 1: Comparison of Original Map to Adopted Map*



13. Prior to the vote, Precinct 2 Commissioner Alica Simmons, who is Black, warned the community her colleagues were “engaging in intentional discrimination against minority voters.”

14. Defendant O’Hare’s own statements indicate intent to discriminate against Black and Latino voters. He has a history of racially discriminatory public statements and official actions, including statements and official actions targeting his Black and Latino constituents, and opposing initiatives important to the Black and Latino communities of Tarrant County. That history includes his explicit statement on the day of the June 3 vote, when Defendant O’Hare said that “[t]he policies of Democrats continue to fail Black people over and over and over, but many of them keep voting them in. It’s time for people of all races to understand the Democrats are a lost party, they are a radical party, it’s time for them to get on board with us and we’ll welcome them with open arms.” This overt statement lays bare Defendant O’Hare’s intent to burden Black voters’ ability to vote for the candidate of their choice.

15. Defendants failed to take into account traditional redistricting criteria, the convenience of County residents, or input from communities of color, resulting in a contorted map

that intentionally discriminates against and results in disproportionate disenfranchisement of the County's Black and Latino voters.

16. This unrepresentative, unfair map will result in real-world impacts to Black and Latino residents of Tarrant County, particularly in determining budget allocations in this booming county.

17. Plaintiffs are civil rights organizations whose members testified against the redistricting process and who tirelessly advocate for equal access to the ballot for all people. In response to Defendants' blatantly discriminatory action, undertaken without regard for the people, Plaintiffs now bring this action for declaratory and injunctive relief under Texas law and the Texas Constitution.

### **I. DISCOVERY CONTROL PLAN**

18. Plaintiffs intend to conduct discovery under Level 3 in accordance with Texas Rule of Civil Procedure 190.4. This case is not subject to the restrictions of expedited discovery under Texas Rule of Civil Procedure 169 because the relief sought does not include monetary relief, only non-monetary injunctive and declaratory relief.

### **II. JURISDICTION AND AUTHORITY**

19. Plaintiffs' request for declaratory and injunctive relief is within the Court's subject-matter jurisdiction under Article V, Section 8 of the Texas Constitution and Texas Government Code sections 24.007, 24.008, and 24.011.

20. Venue is proper in Tarrant County under Section 15.002(a)(1) of the Texas Civil Practices and Remedies Code because a substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in Tarrant County.

### III. PARTIES

21. Plaintiff League of United Latin American Citizens of Fort Worth, Council 4568 (“LULAC Council 4568”) brings this lawsuit on behalf of its members. LULAC Council 4568 is a subsidiary organization of the League of United Latin American Citizens (“LULAC”), a national non-profit, non-partisan organization. Founded in 1929, LULAC has over 535 local councils across the nation and is powered by more than 325,000 members. LULAC and its local councils share the same mission: to advance the economic condition, educational attainment, political influence, housing, health and civil rights of the Hispanic population of the United States.

22. LULAC Council 4568 is based in Fort Worth. Black and Latino members of LULAC Council 4568 live across Tarrant County, including in the Original Map’s Precincts 1 and 2. The Adopted Map deprives Black and Latino members of LULAC Council 4568 from having an equal ability to participate in the political process and elect candidates of their choice. All of LULAC Council 4568’s members who reside in Tarrant County have been harmed by the lack of transparency and failure to consider the voters’ convenience in this redistricting.

23. LULAC Council 4568 regularly organizes voter registration events, hosts scholarships and charity fundraisers benefiting the Latino community, and participates in community-wide charity events with other organizations serving the Latino community in the County. As a representative of LULAC Council 4568, its president also publishes a Spanish-language publication helping to educate the Latino community in Tarrant County on civic issues.

24. Gayland Taylor is an African-American resident of Tarrant County. He is a member of LULAC Council 4568. He resides in Mansfield, in the Original Map’s majority-minority Commissioner Precinct 2. Under the Adopted Map 7, he still resides in Commissioner Precinct 2, but Precinct 2 is no longer majority-minority. Mr. Taylor is a registered voter who regularly voted

for Commissioner Alisa Simmons and other Black and Latino candidates-of-choice in the past. He intends to vote in the Precinct 2 Commissioners Court election in the future. Under the Adopted Map, Mr. Taylor no longer has an equal opportunity to elect his candidate of choice for Commissioners Court.

25. Plaintiff League of Women Voters of Tarrant County (“LWV Tarrant County” or “the League”) brings this lawsuit on behalf of its members. LWV Tarrant County is the Tarrant County affiliate of the League of Women Voters of Texas (“LWVTX”), which are both affiliates of the national League of Women Voters (“LWV”), a non-profit, non-partisan, grassroots organization working to protect and expand voting rights and ensure everyone is represented in our democracy. Founded in 1920, LWV has over 750 local Leagues in every state and the District of Columbia and more than a million members and supporters. LWV’s mission is to empower voters and defend democracy, and all Leagues—local, state, and national—share this mission and regularly engage in efforts to register and encourage individuals, including Black and Latino individuals, to take part in the political process.

26. LWV Tarrant County currently has over 147 members both in the County and in the vicinity of the County, including Black and Latino members located in the Original Map’s Precincts 1 and 2. Like members of LULAC Council 4568, the League’s members have been “cracked” and “packed” under the Adopted Map, which eliminates one of two majority-minority precincts and deprives them of an equal ability to participate in the political process and elect candidates of their choice. Some of these members also face the immediate injury of disenfranchisement because they were entitled to vote for a commissioner candidate in the November 2026 election, but have been moved into a precinct that must wait until 2028 for a commissioner election. All of LWV Tarrant County’s members who reside in Tarrant County have



been harmed by the lack of transparency and failure to consider the voters' convenience in this redistricting.

27. As part of carrying out its mission, LWV Tarrant County regularly organizes voter registration events, such as National Voter Registration Week and Get Out the Vote events. Those efforts help to register voters across the County, including at local high schools and college campuses in the County. LWV Tarrant County also works to combat discrimination and make voting more accessible to all people, including the Black and Latino communities, through efforts like translating its voter guides into Spanish and collaborating on voter registration with Black and Latino organizations. LWV Tarrant County's members further this mission by attending local coalition meetings, including LULAC meetings, as representatives of LWV Tarrant County.

28. Deborah Spell is a Black resident of Tarrant County. She is a member of LWV Tarrant County. She resides in Arlington, which sat in Commissioner Precinct 2 under the Original Map's commissioners precinct boundaries. Under the Adopted Map 7, she still resides in Commissioner Precinct 2, but Precinct 2 is no longer majority-minority. Ms. Spell is a registered voter who regularly voted for Commissioner Alisa Simmons and other Black and Latino candidates-of-choice in the past. She intends to vote in the Precinct 2 Commissioners Court election in the future. Under the Adopted Map, Ms. Spell no longer has an equal opportunity to elect her candidate of choice for Commissioners Court.

29. Defendant Tarrant County, Texas is a political and geographical subdivision of the State of Texas. Defendant Tarrant County may be served with process by serving the County Judge, Tim O'Hare, at 100 East Weatherford Street, Suite 501, Fort Worth, Texas 76196, under the authority of Texas Civil Practice and Remedies Code Section 17.024(a).

30. Defendant Tarrant County Commissioners Court is the governing body of Tarrant County, consisting of four commissioners elected from single-member precincts and a County Judge elected countywide. This District Court has supervisory jurisdiction over the Tarrant County Commissioners Court. Tex. Const. art. 5, § 8. The current members are Defendant County Judge Tim O'Hare; Precinct 1 Commissioner Roderick Miles Jr.; Precinct 2 Commissioner Alisa Simmons; Precinct 3 Commissioner Matt Krause; and Precinct 4 Commissioner Manny Ramirez.

31. Defendant County Judge Tim O'Hare is the elected, presiding officer of the Tarrant County Commissioners Court. On information and belief, Defendant O'Hare resides in Tarrant County, Texas. Defendant O'Hare is sued in his official capacity.

#### **IV. PURPOSE OF SUIT**

32. The purpose of this suit is to temporarily and permanently enjoin Defendants from enforcing the commissioners precinct boundaries adopted and effective as of June 3, 2025.

#### **V. BACKGROUND**

##### **A. Tarrant County and its Commissioners Court**

33. Tarrant County is the fourteenth-largest county in the United States by population and the third-largest in Texas. It is home to significant racial diversity, with a majority-minority population and a larger proportion of Black residents than Texas as a whole.

34. According to the 2020 U.S. Census, 42.2 percent of Tarrant County's population identify as Anglo, while 49.8 percent identify as Black, Hispanic, or Latino. More specifically, 30.5 percent of individuals identify as Hispanic or Latino and 19.3 percent of individuals identify as Black. Eight percent identify as Asian, American Indian or Alaska Native, Native Hawaiian or Pacific Islander, or two or more races.

35. The County has a 46.9 percent Anglo voting age population ("VAP"), a 26.3 percent Hispanic VAP, and a 16.4 percent Black VAP.

36. Tarrant County has experienced significant growth in recent decades, with the population growing by 17 percent between the 2010 census and the 2020 census, and projected to reach 2.5 million residents by 2030.<sup>3</sup>

37. From 2010 to 2020, the population of Black and Latino individuals in the County increased more than the Anglo population in the County. The Latino population increased by over 137,000 individuals, while the Black population increased by over 97,000 individuals. By contrast, as in many other counties in Texas, the proportion of residents identifying as Anglo shrank in the last decade by 13 percent.<sup>4</sup>

38. Tarrant County is governed by a County Commissioners Court comprising four Commissioners and one County Judge. Each County Commissioner represents their respective commissioner precinct, is elected by its residents in staggered four-year terms, and has countywide responsibilities as well as responsibilities specific to his or her precinct. The County Judge is elected countywide for a four-year term, is presiding officer of the Commissioners Court, and has countywide duties.

39. The Commissioners Court is the governmental body responsible for drawing and enacting the boundaries of the four commissioner precincts. Tex. Const. art. V, § 18(a)–(b).

40. Commissioner precincts must abide by state law and the one-person one-vote requirement of the U.S. Constitution, as well as other provisions of the U.S. Constitution and the Voting Rights Act. Generally, commissioner precincts must be redistricted the year following a

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<sup>3</sup> N. Tex. Comm'n, *Demographic Trends in Texas and the DFW Area*, 6, 36, TEX. DEMOGRAPHIC CTR. (Jul. 28, 2022) [https://demographics.texas.gov/Resources/TDC/Presentations/ecb1e70e-e078-4158-ad5b-a9b61959c121/20220729\\_DemographicTrendsTexasAndTheDfwArea.pdf](https://demographics.texas.gov/Resources/TDC/Presentations/ecb1e70e-e078-4158-ad5b-a9b61959c121/20220729_DemographicTrendsTexasAndTheDfwArea.pdf).

<sup>4</sup> See Gordon Dickson *Tarrant County Makes Big Gains In Black, Hispanic, Asian Residents, Census Data Shows*, FORT WORTH STAR-TELEGRAM (Aug. 12, 2021) <https://www.star-telegram.com/news/business/growth/article253448809.html>.

decennial U.S. Census if the Census data shows a population deviation of 10 percent or greater between the largest and smallest precincts.

41. Between the 2010 and the 2020 U.S. Census, Tarrant County's population grew evenly across all four commissioners precincts, suggesting the fairness and balance of the map in place from 2011 until June 3, 2025 (i.e., the Original Map). When the Original Map was initially adopted in 2011, after the 2010 Census, three of the precincts—Precincts 2, 3, and 4—were majority Anglo. In 2011, Precinct 1 was the sole majority-minority district, as it had been for several decades, and consistently elected the candidate of minority voters' choice.

#### **B. The Prevalence of Racially Polarized Voting in Tarrant County**

42. By the 2020 Census, demographic changes meant that the Original Map's Precincts 1 and 2 had become majority-minority.

43. According to a publicly available statistical analysis of past elections performed by data scientist Michael Rios at the University of California Los Angeles ("UCLA"), Black and Latino voters in Tarrant County are politically cohesive and overwhelmingly support the same candidates countywide and in the Original Map's Precincts 1 and 2.<sup>5</sup> Professor Rios's data also found that Anglo voters are politically cohesive and vote for different candidates than those supported by minority voters.<sup>6</sup>

44. According to Professor Rios's analysis, a significant and large majority of Black and Latino voters in the Original Map's Precincts 1 and 2 favored the same candidates in recent county and statewide elections.

45. Since the adoption of the Original Map in 2011, the Original Map's majority-minority Precinct 1 has elected a Black Commissioner.

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<sup>5</sup> UCLA Voting Rights Project, Tarrant Cnty. Analysis, 2 (June 2, 2025).

<sup>6</sup> *Id.*

46. Although the Original Map's Precinct 2 was initially majority Anglo, by 2018 the growing minority population in the Original Map's Precinct 2 was able to elect their candidate of choice, Black Democrat Devan Allen. In 2022, the majority-minority population was again able to elect their candidate of choice, current Commissioner Simmons. In doing so it rejected the Anglo-preferred candidate, former Commissioner Andy Nguyen, who once stated at a rally, "If being called racist is the price I have to pay to save our country, then I'll pay it."

47. This political cohesion among minority voters in Precincts 1 and 2 is also apparent in countywide elections. In the 2020 elections, both majority-minority Precincts 1 and 2 voted to elect the minority candidates of choice in the presidential race (Democrat Joe Biden) and the County Sheriff's race (Black Democrat Vance Keyes). In the 2022 elections, both majority-minority Precincts 1 and 2 voted to elect the minority candidates of choice in the county judge race (Democrat Deborah Peoples, over Anglo-preferred candidate and now-County Judge Defendant O'Hare) and the county district attorney's race (Black Democrat Tiffany Burks). This same cohesive voting pattern for minority voters is present countywide, including results from other elections.

48. The UCLA analysis also shows that Anglo voters in Tarrant County—including the Adopted Map 7's Precinct 2—overwhelmingly vote for the same candidates and vote sufficiently as a bloc to defeat the Black- and Latino-preferred candidates in the Adopted Map 7's Precinct 2. These high rates of Anglo bloc voting—rejecting the minority-preferred candidates—exist countywide and in the Adopted Map 7's Precinct 2.

49. These analyses indicate that the Adopted Map 7 has only one precinct in which Black and Latino voters will be able to elect the candidate of their choice.

**C. Policy Impact of a Commissioners Court Unresponsive to Black and Latino Voters**

50. This 4–1 entrenchment will have serious ramifications, including on Black and Latino communities’ ability to have a say in County budget and taxation. The Texas Local Government Code requires commissioners courts to have at least four members present to hold a vote on the levying of a county tax. Tex. Loc. Gov’t Code § 81.006. Under the Original Map with two minority-majority precincts, the Commissioners Court needed the presence of at least one minority-preferred Commissioner in order to hold a vote on levying a county tax. Because the Adopted Map 7 entrenches a 4–1 Anglo-preferred candidate split, the Commissioners Court can hold a vote on levying a county tax without the presence of a single minority-preferred Commissioner, meaning that Black and Latino communities’ voices are effectively silenced on issues of County taxation.

51. This issue of taxation is exacerbated by the fact that Black and Latino voters have expressed policy preferences that do not align with those of the Anglo-preferred members of the Commissioners Court, who have been clearly less responsive to the needs of Black and Latino communities in their precincts than have the minority-preferred Commissioners.

52. For example, the two Black Democratic commissioners, Commissioners Simmons and Miles, are fixtures in the Black and Latino communities throughout Tarrant County. Both Commissioner Simmons and Commissioner Miles and their staffs attend the community and neighborhood events put on by Plaintiff organizations and other Black and Latino community organizations.

53. Commissioner Simmons is an advocate for Black and Latino community organizations and individual residents in the County. For example, she has held over a dozen town halls to provide community members an opportunity to learn about County government and express concerns.

54. Commissioner Miles has supported other Black candidates for public office, such as local Black candidates for city council.

55. In addition to the specific issues detailed in this Petition, Commissioners Simmons and Miles are often the only members of the Commissioners Court to vote in line with or advocate for the policy preferences of a majority of the Black and Latino communities.

56. For example, in March 2025, the Commissioners Court voted on a proclamation brought by Commissioner Simmons recognizing National Social Work Month. The language originally recognized social workers' advocacy "for this nation to live out its true values of equal rights for all people no matter race, sexual identity, gender, gender expression, culture or religion." But County Judge O'Hare and Commissioners Ramirez and Krause demanded deletion of the recognition of equality of race, sexual identity, gender, gender expression, and religion—over the opposition of Commissioners Simmons and Miles

57. Similarly, the past majority-preferred Commissioners from Precinct 1 and 2 were often the only members of the Commissioners Court to vote in line with the policy preferences of a majority of the Black and Latino communities in the County.

58. In February 2023, former Precinct 1 Commissioner Roy Brooks and Commissioner Simmons were the only two votes supporting mandatory training on harassment and unconscious bias for Tarrant County employees. County Judge O'Hare opposed the mandatory training.

59. In February 2024, former Commissioner Brooks and Commissioner Simmons were the only two votes opposing a proposal to end a county-subsidized program providing free rides to the polls on Election Day. Former Commissioner Brooks made clear that he supported the program in part because of the long history of disenfranchisement of Black communities, while County Judge O'Hare wanted to end the program because, as he stated at the Commissioners Court

meeting, “I don’t think that taxpayers across the entire county want to pay for a small segment of the population to get on a bus to vote.”

60. In 2024, Defendant O’Hare proposed an agenda item removing Cesar Chavez Day as a paid county holiday, a status it has enjoyed since 2001. The Latino community organized significant opposition, including in-person protests and sending over 1,000 letters in nine days. Nevertheless, in 2025, Defendant O’Hare and Commissioner Krause voted against a proclamation put forward by Commissioner Simmons to honor the Cesar Chavez and Dolores Huerta Committee of Tarrant County, which works to preserve the legacies of the two civil rights leaders.

61. As County Judge, Defendant O’Hare has also spearheaded other attempts to curtail access to voting, including closing early voting sites convenient to students and minority citizens. Targeted sites included one at the University of Texas at Arlington, one of the most ethnically diverse college campuses in the country, and another in a zip code that is 83 percent Hispanic and Black. O’Hare scheduled the vote for this discriminatory measure for a day when the only two Black Commissioners were scheduled to be in D.C. for the Congressional Black Caucus Foundation’s annual conference—travel that had been planned and approved months earlier.

62. Black and Latino community members have also criticized Defendant O’Hare’s handling of issues involving the County jail. More than 70 individuals have died in Tarrant County jails since 2017. Twenty-five of those deaths were not independently investigated as required by a Texas law named for Sandra Bland, a Black Texan woman who died in police custody. Black and Latino community members have pointed to the disproportionate impact of incarceration on their communities. Commissioner Simmons has spoken in favor of jail reforms; by contrast, during public hearings, County Judge O’Hare removed multiple family members of deceased individuals who asked for greater investigation into the deaths.



**D. The Tarrant County Commissioners Court’s 2021 Bipartisan Decision to Retain the Original Map**

63. Despite the above-described events, before this year, redistricting decisions have been made on a bipartisan basis.

64. After the 2020 U.S. Census data was released on August 16, 2021, the Commissioners Court conducted a full redistricting review to determine whether changes to commissioner precinct boundaries were necessary.

65. The Commissioners Court voted to retain the same legal counsel it had used in 2011 redistricting, the Austin-based law firm Bickerstaff Heath Delgado Acosta LLP (“Bickerstaff”), after open discussion regarding the firm’s written deliverables and public mapping services.

66. The Commissioners Court also issued an order establishing nine redistricting criteria, which followed traditional redistricting criteria used in jurisdictions across the country:

- (1) following “easily identifiable geographic boundaries”;
- (2) maintaining “communities of interest” in a single commissioner precinct and “avoid splitting neighborhoods”;
- (3) avoiding the splitting of voting precincts in a way that creates practical election administration issues, as well as avoiding splitting census blocks;
- (4) basing any new map on “existing commissioner precincts”;
- (5) having an overall population deviation that does not exceed 10 percent;
- (6) having compact and contiguous precincts, both functionally and geographically;
- (7) giving consideration to preserving incumbent-constituency relations;
- (8) “avoid[ing] racial gerrymandering”; and
- (9) not “fragment[ing] a geographically compact minority community or pack[ing] minority voters in the presence of polarized voting or

otherwise discriminat[ing] against protected groups so as to create liability under the Voting Rights Act.”<sup>7</sup>

67. The County additionally issued clear guidelines for citizen-drawn maps, including the requirement that any submitted map provide the total population and VAP for racial and ethnic groups. This was because, as the County’s guidelines explained, “as a matter of federal law, the Court will be required to consider the effect of any proposal on multiple racial and ethnic groups.”<sup>8</sup> Without that population breakdown, the Court would lack sufficient information to give any map full consideration.

68. Once retained, Bickerstaff analyzed population growth, demographic trends, and obligations under the U.S. Constitution, the federal Voting Rights Act, and state law. The firm’s analysis concluded that the County’s population growth was evenly distributed across all four commissioner precincts, with less than a 2 percent deviation between the most and least populated precincts. Redistricting was thus not necessary under federal or state law.

69. The adoption of this 2021 map took place through an extensive process over several weeks and included six public input hearings.

70. As part of its review, the Commissioners Court held two public drawing sessions, on October 12, 2021 and October 26, 2021, in which the commissioners were given the opportunity to propose specific changes to the maps and have a map-maker analyze the implications on each precinct’s population and demographics. All five members of the Commissioners Court engaged in these public drawing sessions.

71. During one session, the Commissioners Court seriously considered an alternative map submitted by a citizens’ group. The Commissioners Court publicly discussed the alternative

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<sup>7</sup> Order Adopting Criteria For Use in 2021 Redistricting Process (Sep. 28, 2021).

<sup>8</sup> Guidelines for Persons Submitting Specific Redistricting Proposals and Providing Comments (Sep. 28, 2021).

map and publicly asked an attorney from Bickerstaff to provide perspective.

72. On November 2, 2021, after Bickerstaff’s review, the Commissioners Court’s deliberation, and public input, the Commissioners Court voted 4–1 on a bipartisan basis to retain the Original Map until the 2030 Census. As the Commissioners Court explained, “the results of the 2020 federal Census have been considered and indicate that the County’s current commissioner precincts are sufficiently population-balanced that they do not require redistricting,” and “the Commissioners Court finds that taking no action to redistrict Tarrant County’s commissioner precincts at this time is in the best interest of the citizens of the County and is believed to comply with all state and federal requirements.”<sup>9</sup>

73. The following table (“Table 1”) provides the approximate demographics of each commissioner precinct in the Original Map, based on the 2020 U.S. Census data for total population and the mapping files provided on the Tarrant County Commissioners’ Court website, including an estimation of VAP and Citizen Voting Age Population (“CVAP”) by race.

***Table 1: Analysis of Original Map***

|                       | <b>Precinct 1</b> | <b>Precinct 2</b> | <b>Precinct 3</b> | <b>Precinct 4</b> |
|-----------------------|-------------------|-------------------|-------------------|-------------------|
| Anglo VAP             | 34.4%             | 40.1%             | 64.3%             | 48.8%             |
| Hispanic VAP          | 30.1%             | 25.3%             | 15.7%             | 34.2%             |
| Black VAP             | 29.7%             | 23.9%             | 8.6%              | 9.4%              |
| Hispanic + Black VAP  | 59.8%             | 49.2%             | 24.3%             | 43.5%             |
| Anglo CVAP            | 39.5%             | 45.7%             | 69.9%             | 56.1%             |
| Hispanic CVAP         | 24.9%             | 20.7%             | 13.2%             | 28.0%             |
| Black CVAP            | 31.0%             | 25.2%             | 9.3%              | 10.1%             |
| Hispanic + Black CVAP | 55.9%             | 45.8%             | 22.5%             | 38.1%             |

<sup>9</sup> Order Determining Not to Redistrict Tarrant County’s Commissioner Precincts (Nov. 2, 2021).

74. Under the Original Map, both Precinct 1 and Precinct 2 are majority-minority districts, with minority residents (Black, Hispanic, and other non-Anglo populations) making up over 50 percent of the precincts' VAP and CVAP.

75. The Original Map thus reflects the fact that Tarrant County has a majority-minority population.

**E. The 2025 Commissioners Court's Retention of PILF and Closed-Door Redistricting Process**

76. As of 2025, the five members of the Court are: Defendant County Judge Tim O'Hare; Precinct 1 Commissioner Roderick Miles Jr.; Precinct 2 Commissioner Alisa Simmons; Precinct 3 Commissioner Matt Krause; and Precinct 4 Commissioner Manny Ramirez. Similar to the Court's composition in 2021, it comprises three Republicans and two Democrats.

77. Commissioner Miles and Commissioner Simmons are the only Black and Democratic members of the Commissioners Court. Under the Original Map, they represented the two majority-minority precincts in the County as the candidates of choice for those minority voters.

78. Three of the five seats on the Commissioners Court are up for election in 2026: the County Judge, Precinct 2 Commissioner, and Precinct 4 Commissioner. The Precinct 1 Commissioner and Precinct 3 Commissioner are up for election in 2028.

79. As mentioned, the County has never undertaken a mid-decade redistricting process prior to 2025.

80. In a surprise move with no obvious triggering event, Defendant O'Hare placed on the April 2, 2025 Commissioners Court agenda an item seeking to retain the Public Interest Legal Foundation ("PILF") to oversee a mid-decade redistricting of the commissioners precincts. The action requested by Defendant O'Hare was for services including "providing legal advice, drawing

potential maps, and appearing in Court to discuss the potential adoption of a new map.”<sup>10</sup> The agenda item was placed under the “County Judge” section of the agenda.

81. PILF is a Virginia-based firm defending Galveston County in an ongoing redistricting lawsuit over minority vote dilution and racial gerrymandering. PILF has also engaged in voting-related litigation around the country that has been described as “meritless” and “conspiratorial.”<sup>11</sup>

82. During the April 2, 2025 Commissioners Court meeting, Defendant O’Hare stated, “Staff did not choose the firm” and that he “researched and found [PILF] myself.”

83. Commissioners Simmons and Miles opposed the retention of PILF and the proposed mid-decade redistricting process. In her opposition to retaining PILF, Commissioner Simmons stated, “majority-minority precincts formed through years of community organizing and coalition-building are essential for ensuring that communities of color have a meaningful voice in our elections. To dismantle these precincts is to silence their voices, to deny them their rightful representation.” She also stated that PILF “exists solely in order to undermine the voting strength of minority voters” and that by voting to retain PILF, her colleagues were “engaging in intentional discrimination against minority voters, putting this county at risk of more litigation.”

84. When Commissioner Simmons raised concerns regarding PILF’s past work, Defendant O’Hare responded, “I don’t answer to you.” He also threatened to have a member of the public removed for applauding in support of a speaker testifying against redistricting.

85. At the April 2 meeting, Commissioners Court members who favored the redistricting process relied publicly on only two rationales. The first was alleged population

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<sup>10</sup> Public Interest Legal Foundation Legal Services Agreement With Tarrant County (Apr. 2, 2025).

<sup>11</sup> Peter Stone, *Trump Allies Spending Millions to Dissuade Voters in Key States From Polls*, GUARDIAN (Oct. 21, 2024) <https://www.theguardian.com/us-news/2024/oct/21/trump-maga-swing-states-voters>.

deviation. Commissioner Ramirez stated that “[o]ur current precincts are not balanced by population” and he wanted to “explor[e] a population-balanced, politically responsible, redistricting plan.” Despite this argument, Commissioner Ramirez later admitted that he did not have current data to show that the precincts were uneven.

86. The Commissioner Court members in favor also relied on an explicitly partisan argument for the redistricting. For example, Commissioner Ramirez stated in a press statement he wanted “to ensure that our county continues to enjoy responsible conservative leadership.”

87. On April 2, 2025, the Commissioners Court voted 3–2, over the objection of the two Black Commissioners, to retain PILF for a mid-decade redistricting process. It did so even though PILF did not provide a public presentation or promise detailed written deliverables, as Bickerstaff had in 2021. As part of this agreement, Tarrant County agreed to pay PILF \$450 per hour for the initial stage of redistricting.<sup>12</sup>

88. PILF moved quickly, meeting with individual Commissioners on April 30, 2025, ostensibly to gather their input on designing maps. Within 48 hours of these meetings, PILF submitted five proposed maps to the Commissioners Court. Those maps were released to the public on Friday, May 2.

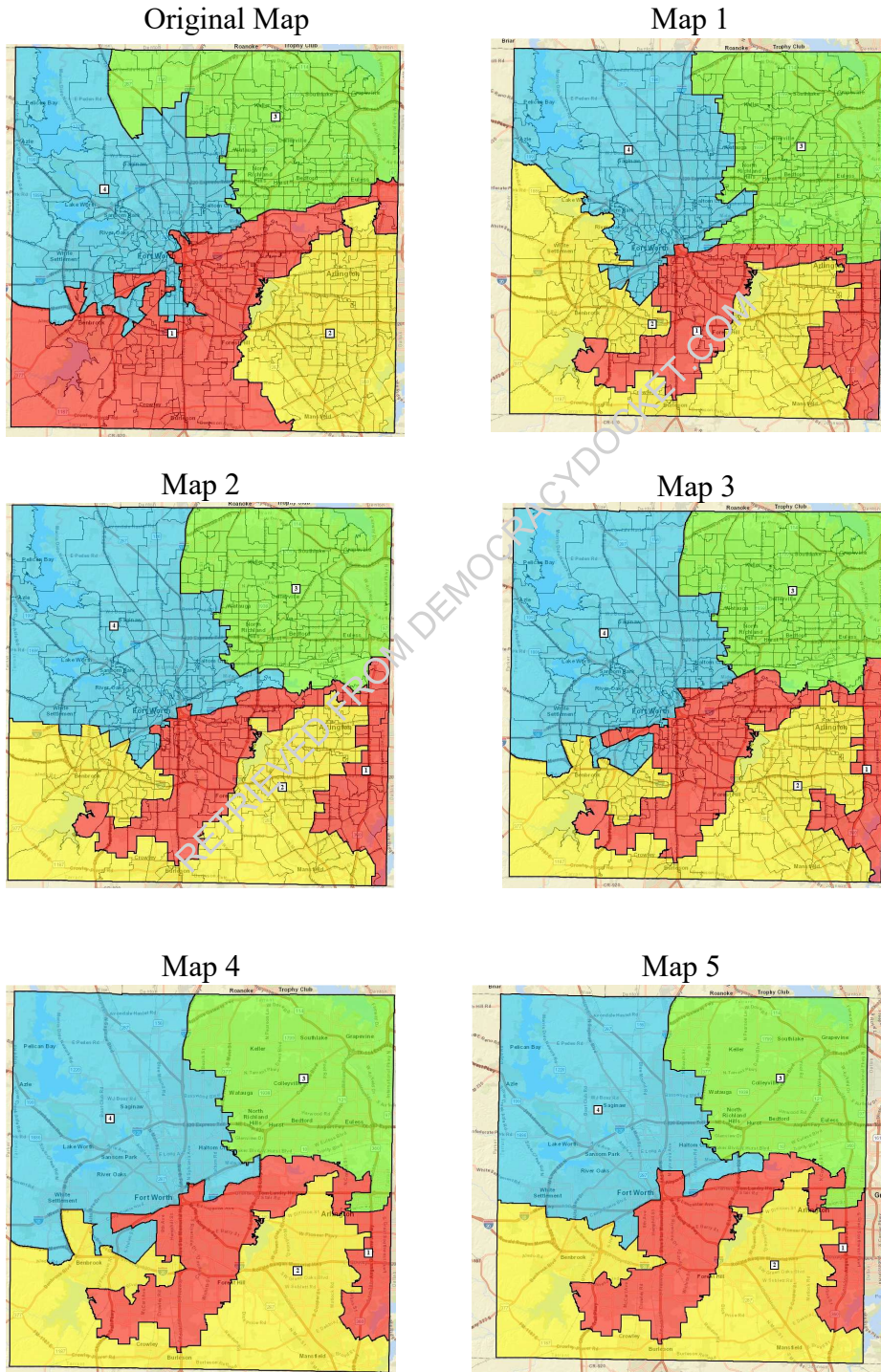
89. Although Arlington was previously left intact in the Original Map’s Precinct 2, the five proposed maps split Arlington across Precincts 1, 2, and 3. The proposed maps turned Precincts 1 and 2 into jigsaw puzzle pieces across the south of the County. These changes clearly fractured minority communities of interest in Precinct 2.

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<sup>12</sup> Public Interest Legal Foundation Legal Services Agreement With Tarrant County (Apr. 2, 2025).

90. The following image (“Image 2”) shows the Original Map (top left), compared to the first five maps proposed by PILF, as posted on the Tarrant County Commissioners’ website.

***Image 2: Comparison of Original Map and First Five Map Proposals (Maps 1–5)***



91. Commissioner Simmons and members of the public objected to the rushed timeline and questioned what criteria and principles PILF used to draw the maps so quickly.

92. PILF and the Commissioners Court failed to provide information about the racial and ethnic populations, VAP, or CVAP. PILF and the Commissioners Court also failed to provide a breakdown of the number of people moved from one district to another, or an analysis of the effect on city boundaries, election precincts, or other communities of interest. The maps were accompanied only by summary data on the partisan balance of each precinct.

93. This lack of information departed from the Commissioners Court's 2021 process, in which they released and discussed racial and ethnic demographic data for each proposed map.

94. Commissioner Simmons submitted a written request for population and demographic details and specifically asked to speak or otherwise communicate with the map drawer. She repeated the request to Defendant O'Hare and PILF representative Joe Nixon. Neither Defendant O'Hare nor PILF responded to her requests.

95. PILF and the Commissioners Court failed to list any criteria or principles they had used to draw the maps, besides comments by Defendant O'Hare, Commissioner Krause, and Commissioner Ramirez relating to population growth and partisanship unsupported by any statistical evidence. This failure to clearly establish mapping principles and criteria was a stark departure from the 2011 and 2021 processes, when the Commissioners Court voted to adopt public criteria for redistricting. Indeed, all the proposed maps, including the later-ratified Adopted Map 7, violated several of the 2021 criteria.

96. The Commissioners Court also departed from its 2021 process by failing to hold any public map-drawing session. Unlike other local jurisdictions that sought public input on



redistricting, the Commissioners Court did not provide any mapping tool for the public to produce its own maps. Nevertheless, the members of the public submitted nine maps for consideration.

97. The Commissioners Court further departed from its 2021 process by failing to publicly review any of the nine alternative, citizen-created maps that were submitted. Commissioner Miles stated that he was never given the citizen maps to view before the final vote, while Commissioners Krause and Ramirez stated that they had viewed the citizen maps. When asked about the citizen maps by reporters at the Commissioners Court meeting, Defendant O'Hare told them to "buzz off."

98. At the May 6, 2025 Commissioners Court meeting, public commentators unanimously opposed the redistricting decision, with many objecting to the rushed process and its shortcomings compared to the 2021 process. Commissioner Simmons pointed out that both she and Commissioner Miles had opposed new maps, and asked why five proposed maps were drawn when only three other members of the Commissioners Court had been in favor of redistricting.

99. Between May 13 and May 21, the Commissioners Court held four community hearings on redistricting, with one hearing in each precinct. PILF refused to participate in these hearings, despite commissioners' requests. Hundreds of people attended the hearings, with most criticizing the redistricting as racially motivated.

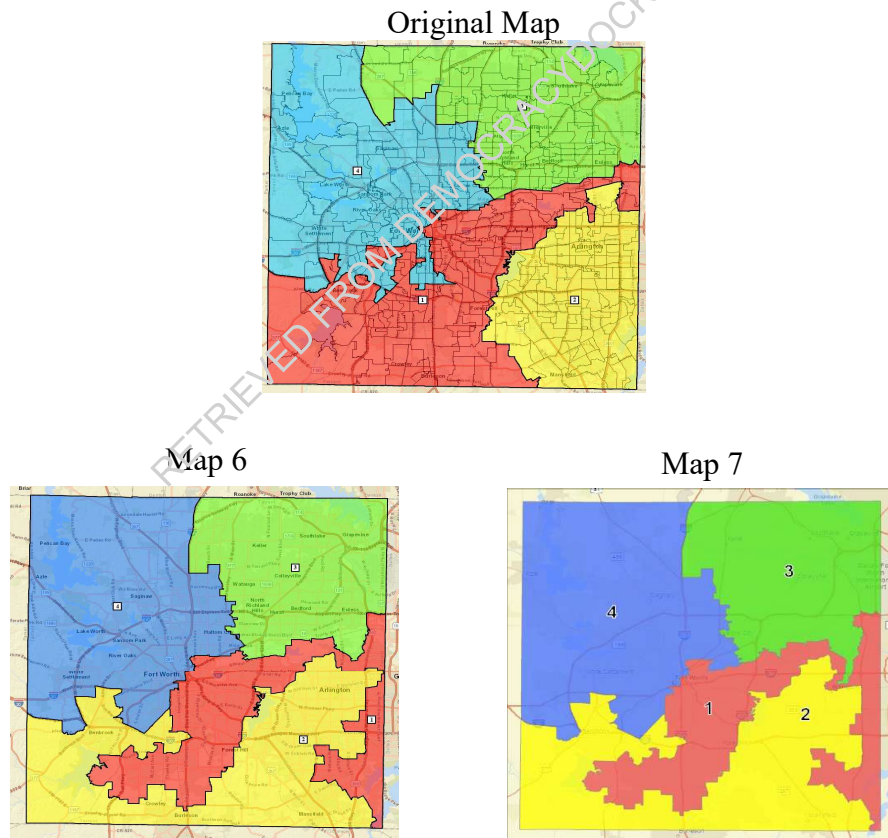
100. On May 27, nearly a week after the final community hearing on the proposed five maps, PILF representative Joe Nixon emailed a sixth map ("Map 6") to members of the Commissioners Court. Commissioner Ramirez's chief of staff told reporters that she was "not certain why the sixth map was drawn." Map 6 was not released to the public until May 29.

101. On May 30, 2025—a Friday, and only one business day before the Commissioners Court was set to vote on the maps—the Court released a seventh map to the public (“Map 7”). The public has never been informed of why Map 7 was created, or what factors went into its creation.

102. As with the first five proposed maps, the Commissioners Court published Maps 6 and 7 online without any demographic data, thus obscuring their effect on the racial and ethnic representation in each precinct.

103. The following image (“Image 3”) shows the Original Map (top left), compared to Maps 6 and 7 proposed by PILF, as posted on the Tarrant County Commissioners’ website.

***Image 3: Comparison of Original Map and Proposed Maps 6 and 7***



104. Because Maps 6 and 7 were released after the four community hearings in each precinct, members of the public were only able to comment on those maps at the June 3, 2025 Commissioners Court meeting. The following table (“Table 2”) lays out the timeline heading into the June 3, 2025 vote on Map 7.

**Table 2: Timeline of 2025 Redistricting Process**

|               |   |
|---------------|---|
| April 2, 2025 | 3–2 Commissioners Court vote to retain Virginia-based Public Interest Legal Foundation (“PILF”) for a redistricting process. The contract states that PILF will “provide consultation in the process of adopting a new districting map.” Defendant O’Hare put this item on the agenda and stated that he “researched and found” PILF. |
| April 30      | PILF meets with the five Commissioners.   |
| May 2         | PILF submits Maps 1–5 to the Commissioners Court.   |
| May 6         | Commissioners Court meeting where members of the public <i>all</i> testify in opposition to the redistricting process.  |
| May 13–21     | Four community hearings are held to discuss the maps, one in each precinct. PILF refuses to speak at any of the hearings or answer questions.   |
| May 27        | Joe Nixon of PILF emails Map 6 to the Commissioners Court.  |
| May 28        | Map 6 is released to the public.  |
| May 30        | Map 7 is released to the public, only one full business day before the vote.  |

105. This timeline shows how a redistricting process that frequently takes half a year or more became compressed into just two months, from announcing the intention to redistrict to adopting a map. This rushed process reflects the Commissioners Court’s intent to exclude community input and to avoid addressing the concerns of Black and Latino voters and considering the convenience of the people.

106. The following table (“Table 3”) compares the 2021 redistricting process with the 2025 redistricting process.

**Table 3: Comparison of the 2021 and Challenged 2025 Redistricting Process**

| <b>2021 Redistricting</b>  | <b>2025 Redistricting</b>   |
|--|---|
| Immediately following federal Census   | Mid-decade redistricting, <b>five years prior</b> to next Census  |
| Austin-based firm Bickerstaff Heath Delgado Acosta LLP                                   | <b>Virginia</b> -based firm Public Interest Legal Foundation  |
| Bickerstaff provided deliverables to the Commissioners Court ahead of vote to retain     | PILF did <b>not</b> provide deliverables to the Commissioners Court ahead of vote to retain   |
| Publicly adopted mapping criteria  | <b>No</b> publicly adopted mapping criteria   |
| Guidelines requiring data on racial/ethnic demographics                                  | <b>No</b> release of data on racial/ethnic demographics   |
| Two public map-drawing sessions  | <b>No</b> public map-drawing session  |
| Citizen-submitted map discussed in Commissioners Court meeting                           | Nine citizen-submitted maps <b>never</b> discussed or reviewed  |
| Commissioners Court publicly asked Bickerstaff attorney to analyze citizen-submitted map | Commissioners Court did <b>not</b> publicly ask PILF to analyze citizen-submitted maps; citizen-submitted maps <b>never</b> discussed |
| Final map adhered to publicly adopted mapping criteria                                   | <b>No</b> publicly adopted mapping criteria available; final map <b>violated</b> previously adopted 2021 criteria                     |

107. This chart demonstrates the stark deviation from the 2021 redistricting process to the 2025 process. This intentional departure from prior established criteria further reflects the Commissioners Court’s intent to exclude community input and to avoid addressing the concerns of Black and Latino voters.

**F. The Racially Discriminatory Proposed Maps and Adopted Map 7**

108. In the leadup to the vote on June 3, 2025, prominent Republican voices explicitly tied the County’s redistricting efforts to racial reasoning. On May 10, 2025, the Tarrant County GOP’s weekly newsletter argued that redistricting is necessary in part because “[t]he black population increased by nearly 100,000, and the Hispanic population increased by almost 150,000, while the white population decreased” since the last redistricting.<sup>13</sup> The newsletter went on to state, “Considering that the ethnic makeup and the overall size of the population have changed so

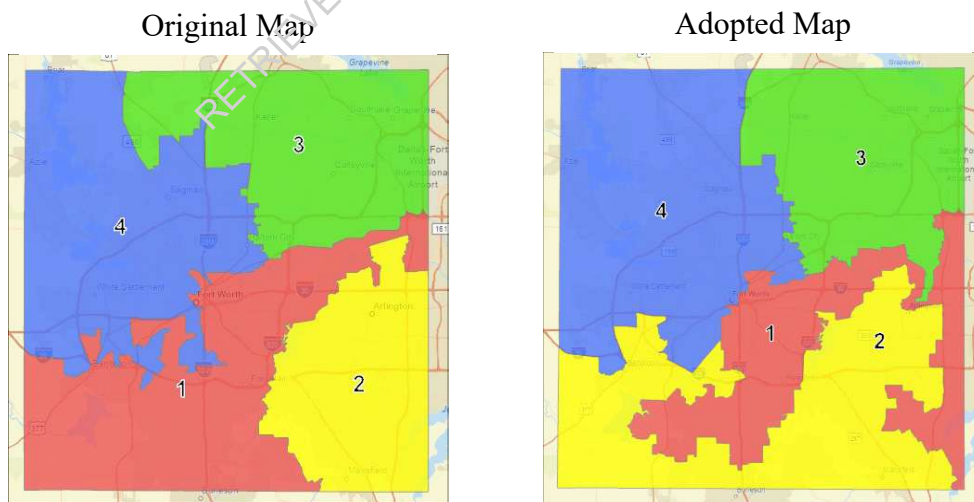
<sup>13</sup> GOP Roundup, Tarrant County GOP (May 10, 2025).

dramatically since the 2010 census, it only makes sense that we redistrict to better serve the population.”<sup>14</sup> This official party statement essentially asserts that a reason to redistrict was to account for estimated increases in Black and Latino populations, although the redistricting would be based on 2020–21 data. Defendant O’Hare and Commissioners Krause and Ramirez are all members of the Republican Party.

109. On May 27, 2025, former Tarrant County Judge and Republican Glen Whitley, Jr., who led the Commissioners Court during the 2011 and 2021 redistricting discussions, said, “I believe they should pump the brakes [on the redistricting effort]. You know, from what I can see of this, it is very racially motivated.”

110. These observations are bolstered by the Adopted Map 7’s failure to satisfy traditional redistricting criteria. As seen in Image 4 below, the Adopted Map 7’s contorted shape does not conform to the stated public criteria used in the 2021 redistricting, including the requirement that it have “compact and contiguous precincts.”

***Image 4: Comparison of Original Map to Adopted Map***



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<sup>14</sup> *Id.*

111. All seven proposed maps make significant changes to the Original Map’s majority-minority Precincts 1 and 2 (represented by the only two Black Commissioners) while making minimal changes to Precincts 3 and 4. These changes have serious ramifications for the minority voters in Tarrant County’s ability to elect a candidate of their choice.

112. Under the Original Map, both Precinct 1 and Precinct 2 were majority-minority districts, with Black and Hispanic, Asian, and Native residents making up over 50 percent of the district populations. In addition, Black and Hispanic residents in particular formed a significant portion of those precincts’ populations. Black and Hispanic residents made up 59.8 percent of VAP and 55.9 percent of CVAP in the Original Map’s Precinct 1, and 49.2 percent of VAP and 45.8 percent of CVAP in the Original Map’s Precinct 2.<sup>15</sup>

113. Adopted Map 7 significantly altered these proportions. The following table (“Table 4”) provides the approximate demographics of each commissioner’s precinct in the Adopted Map 7, based on the 2020 U.S. Census data for total population and the mapping files provided on the Tarrant County Commissioners’ Court website, including an estimation of VAP and CVAP by race. The parentheticals show the percentage change from the Original Map.

**Table 4: Analysis of Adopted Map 7**

|                      | <b>Precinct 1</b> | <b>Precinct 2</b> | <b>Precinct 3</b> | <b>Precinct 4</b> |
|----------------------|-------------------|-------------------|-------------------|-------------------|
| Anglo VAP            | 22.4% (-12.0%)    | 50.4% (+10.3%)    | 62.6% (-1.7%)     | 51.0% (+2.2%)     |
| Hispanic VAP         | 34.3% (+4.2%)     | 25.0% (-0.3%)     | 15.6% (+0.2%)     | 30.6% (-3.6%)     |
| Black VAP            | 36.2% (+6.5%)     | 16.1% (-7.8%)     | 9.6% (+1.0%)      | 10.4% (+1.1%)     |
| Hispanic + Black VAP | 70.5% (+10.7%)    | 41.2% (-8.2%)     | 25.1% (+1.2%)     | 41.1% (-2.5%)     |
| Anglo CVAP           | 28.0% (-11.6%)    | 55.1% (+9.4%)     | 67.6% (-2.3%)     | 58.5% (+2.4%)     |

<sup>15</sup> See Table 1, *supra* at ¶ 73.

|                       |                |               |               |               |
|-----------------------|----------------|---------------|---------------|---------------|
| Hispanic CVAP         | 27.6% (+2.7%)  | 20.9% (+0.2%) | 13.5% (+0.3%) | 25.2% (-2.8%) |
| Black CVAP            | 38.3% (+7.3%)  | 17.7% (-7.5%) | 10.6% (+1.2%) | 10.7% (+0.6%) |
| Hispanic + Black CVAP | 65.9% (+10.0%) | 38.6% (-7.3%) | 24.1% (+1.5%) | 35.9% (-2.2%) |

114. Map 7 altered the Original Map to create only one majority-minority VAP and CVAP precinct, despite the fact that Tarrant County has remained overall majority-minority. To achieve this discriminatory voter suppression, Map 7 significantly decreased the proportion of Black voters from Precinct 2, with Black CVAP decreasing from 25 percent to 18 percent (over 7 percent loss). Map 7 packs most of these Black voters into the existing majority-minority Precinct 1, where Black CVAP increased significantly from 31 percent to 38 percent (over 7 percent increase). Map 7 disperses the remainder of these Black voters into the heavily-Anglo Precinct 3, thereby diluting their vote.

115. By contrast, Map 7 significantly decreases the proportion of Anglo voters in Precinct 1, with Anglo CVAP decreasing from 40 percent to 28 percent (a nearly 12 percent loss), while significantly increasing the proportion of Anglo voters in Precinct 2, with Anglo CVAP increasing from 46 percent to 55 percent (over 9 percent gain).

116. Under the Original Map, 74 percent of Black voters and 52 percent of Latino voters lived in a majority-minority precinct. Under Map 7, those percentages substantially decrease: only 47 percent of Black voters and 30 percent of Hispanic voters now live in a majority-minority precinct. By contrast, the proportion of Anglo voters in Tarrant County who live in a majority Anglo precinct increased from 61 percent to 89 percent. That statistic clearly illustrates how Black and Hispanic voters were “packed” into Precinct 1.

117. Under the Adopted Map 7, Black and Hispanic voters were significantly more likely to be temporally disenfranchised—i.e., moved from precincts with an upcoming 2026

commissioners election to precincts with a much-later 2028 commissioners election. 24,000 more Black residents of voting age and 11,000 more Hispanic residents of voting age were moved to a precinct with a later 2028 election than were moved to a precinct with an imminent 2026 election.

118. By contrast, nearly 50,000 more Anglo voters were moved to a precinct with an imminent 2026 election than were moved to a precinct with a later 2028 election. In other words, Anglo voters were significantly more likely than Black and Hispanic voters to be moved to precincts with a more imminent 2026 election. Thus, Black and Hispanic voters were disproportionately deprived of the opportunity to vote for their county representative every four years, as they would have expected under the Original Map. Instead, those voters must wait another two years to vote.

119. These changes were not necessary to resolve population deviation. According to the UCLA report, alternative plans can be drawn that bring the population deviation down to zero percent, while keeping two majority-minority precincts where Black and Latino voters can elect a candidate of their choice.

120. The proposed maps, including the Adopted Map 7, had other negative impacts on the Original Map's majority-minority Precincts 1 and 2. All seven maps break the City of Arlington up across three precincts, while the Original Map kept Arlington mostly in Precinct 2. As a result, Map 7 violates the stated public criteria used in the 2021 redistricting, including the requirement that any map "adher[e] to identifiable geographic boundaries" and maintain "[c]ommunities of interest" and "avoid splitting neighborhoods."

121. Map 7 also removed historically Black neighborhoods such as Lake Como and downtown Fort Worth from Precinct 1. Again, this change violates the stated public criteria used in the 2021 redistricting.



122. The Adopted Map also shifted over a hundred miles of serviced and maintained County roads from the majority-minority Precinct 1 into the newly-majority-Anglo Precinct 2, leaving Precinct 1 with only 4.5 miles of unincorporated roads. Because each Commissioner is responsible for roads in their precinct, this shift has the effect of weakening and reducing the scope of the majority-minority Precinct 1. In addition, due to Precinct 2's gerrymandered and sprawling shape, precinct employees will need to travel across the length of the County to reach all the roads in the precinct—stretching County services thin and inconveniencing County residents who rely on those services.

123. Map 7 also contorts itself into a boot-like shape to surgically remove the sports stadiums AT&T Stadium and Globe Life Field from the formerly majority-minority Precinct 1 and into the Anglo-majority Precinct 3.

124. Due to the immediate implementation of the Adopted Map's sprawling, contorted boundaries and the lack of publicly available information, Plaintiffs like LWV Tarrant County report that their members and other County residents are already confused about the effect of the redistricting and do not know in what precinct they now reside or which commissioner represents them.

125. The following table ("Table 5") compares the redistricting criteria adopted by the bipartisan Commissioners Court in 2021 with Map 7.

**Table 5: Comparison of Publicly-Adopted 2021 Redistricting Criteria and Map 7**

| <b>Publicly-Adopted 2021 Redistricting Criteria</b>  | <b>Analysis of Map 7</b>   |
|--|--|
| Follow “easily identifiable geographic boundaries.”  | Fails; breaks up large cities.                                   |
| Maintain communities of interest in a single commissioner precinct and avoid splitting neighborhoods.  | Fails; breaks up large cities, splits up historic neighborhoods. |
| Avoid splitting of voting precincts in a way that creates practical election administration issues.  | Fails; splits 15 voting precincts.                               |
| Avoid splitting census blocks.   | Satisfies, as did Original Map.                                  |
| Base any new map on the existing commissioner precincts.   | Fails; destroys existing Precincts 1 and 2.                      |
| Have an overall population deviation that does not exceed 10 percent.  | Satisfies, as did Original Map.                                  |
| Have compact and contiguous precincts, both functionally and geographically.   | Fails.   |
| Give consideration to preserving incumbent-constituency relations.   | Fails.   |
| Avoid racial gerrymandering.   | Fails.   |
| Avoid “fragment[ing] a geographically compact minority community or pack[ing] minority voters in the presence of polarized voting or otherwise discriminat[ing] against protected groups.” | Fails.   |

**G. The June 3, 2025 Adoption of Map 7**

126. On June 3, 2025, the Commissioners Court held a meeting to vote on the redistricting. That morning, more than 80 protestors gathered to oppose the maps. Public speakers opposing the redistricting included mayors of cities located in Precinct 2, including Mansfield Mayor Michael Evan and Arlington Mayor Jim Ross. Over 200 members of the public signed up to voice their opinions on the proposed maps. The public commentators filled the courtroom, two overflow rooms, and stood in a long line outside the courtroom. Public comment lasted over five hours.

127. Commenters were given one minute to speak on the redistricting plans. Many spoke out against the maps’ racially discriminatory effects, including members of LULAC and LWV. In

addition, both Plaintiff LWV Tarrant County and LULAC Council 4568 sent letters to the Commissioners opposing the redistricting before the vote.

128. Other speakers denounced Defendant O'Hare and called him, and/or the proposed maps, racist; Defendant O'Hare had all, or nearly all, of those individuals ejected from the room.

129. Defendant O'Hare also stated on the record that PILF would be available to answer legal questions. However, PILF refused multiple requests from Commissioner Simmons to come to the podium to answer her questions. PILF never appeared before the Commissioners Court during the meeting.

130. Commissioner Simmons opposed the adoption of a new map. She noted that Map 7 had not been available to the public during the four community hearings. She also asked whether the Commissioners Court had considered the nine maps created by the public.

131. Commissioner Miles also opposed the adoption of a new map and made two motions attempting to keep the Original Map or postpone the vote. Both motions failed.

132. Although Commissioner Ramirez supported the adoption of Map 7, he admitted that "the process, it had flaws. It could have been a lot more comprehensive."

133. The motion to adopt Map 7 passed 3–2, over the objections of the two Black Commissioners. There was no discussion between the Commissioners of adopting any of the other proposed maps.

134. According to the resulting order, Map 7 went into effect immediately after the vote.

135. Defendant O'Hare claimed to reporters that the Commissioners Court "didn't look at race." He also stated that he "asked for" "a map that guarantees three Republican commissioners seats." Similarly, at a prior community hearing on the maps, Commissioner Krause stated that his "entire goal" was to create a 4–1 partisan split on the Commissioners Court.

136. The day after the vote, residents of Tarrant County sued the County, Commissioners Court, and Defendant O’Hare in federal court.<sup>16</sup> A few weeks later, the Commissioners Court voted 3–2 to pay PILF up to \$250,000 to represent Tarrant County in the federal lawsuit. Commissioners Miles and Simmons opposed retaining PILF.<sup>17</sup>

#### **H. County Judge O’Hare’s History of Statements Demonstrating Intentional Discrimination**

137. The apparent instigator of this unprecedented mid-decade redistricting, Defendant O’Hare, has a history of making racially discriminatory statements and taking divisive actions against Black and Latino citizens in his jurisdictions.

138. Years earlier, in 2021, while running for Tarrant County Judge, Defendant O’Hare said on a podcast, “If you’re a Republican officeholder and you haven’t been called a racist, then you probably haven’t done a thing.”

139. As County Judge, Defendant O’Hare held a closed-door meeting in 2023 to discuss the County’s visiting Justice of the Peace policy—but excluded the only three minority Justices of the Peace. The three minority Justices of the Peace issued a statement objecting to Defendant O’Hare’s “racially insensitive” action, stating, “According to census data, Tarrant County is now a majority-minority county, yet decisions are being made without input from or in regard to communities of color.”

140. As City Councilman and Mayor of the City of Farmers Branch, in Dallas County, Defendant O’Hare enacted or championed aggressive policies which targeted immigrants and Latino or Spanish-speaking residents. For example, Defendant O’Hare attempted to make English the official language of the city, to stop the publishing of city paperwork and forms in Spanish,

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<sup>16</sup> Complaint, Dkt. No. 1, *Jackson et al. v. Tarrant County et al.*, No. 4:25-cv-00587 (N.D. Tex. June 4, 2025).

<sup>17</sup> Contract for Legal Services between PILF and Tarrant County (June 16, 2025).

and to criminalize renting or leasing residences to undocumented immigrants—despite prior warning of the discriminatory effect and unconstitutionality of these policies. Defendant O’Hare’s support resulted in the passage of three versions of the ordinance prohibiting renting to undocumented immigrants, but each version was enjoined by a court for unconstitutionality. One injunction was affirmed by the United States Court of Appeals for the Fifth Circuit.<sup>18</sup>

141. Defendant O’Hare’s dogged pursuit of discriminatory ordinances, despite being warned of lawsuits against similar ordinances in other cities, resulted in significant fiscal consequences for the small City of Farmers Branch, including over \$6 million in legal fees. To afford its legal bills, Farmers Branch was forced to dip into its reserves, cut nearly two dozen city employees, and outsource services at the library. *The Dallas Morning News* stated that Defendant O’Hare’s tenure had resulted in an “untold amount [of] damage to [Farmers Branch’s] reputation and good will” and that under Defendant O’Hare, the city had become known for being “hostile to Latino immigrants.”

142. Defendant O’Hare has frequently made anti-immigrant statements. For example, Defendant O’Hare blamed immigrants for a surge in crime and declines in school quality, claims that have been disproven by evidence. He once stated that when retailers cater to Spanish-speaking customers, it leaves “no place for people with a good income to shop” and encouraged residents to oppose the opening of a grocery store catering to Hispanic customers.

143. Others have questioned Defendant O’Hare’s commitment to fairness, particularly related to elections. In April 2023, the longstanding Tarrant County Elections Administrator, Heider Garcia, was forced to resign after meeting with the newly-elected County Judge O’Hare. In his resignation letter, Garcia stated that his nonpartisan mission to ensure a “quality, transparent

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<sup>18</sup> *Villas at Parkside Partners v. City of Farmers Branch*, 726 F.3d 524 (5th Cir. 2013).

election” was incompatible with Defendant O’Hare’s leadership. Former Republican Secretary of State John Scott had previously praised Garcia’s tenure, stating, “If you were building a prototype for an election administrator, you would just copy Heider Garcia.”

144. Garcia’s resignation prompted six elected officials to send a letter to the Department of Justice, requesting an investigation into Defendant O’Hare’s attempts to undermine the “racial fairness of our elections.”

145. Defendant O’Hare maintains close ties to the True Texas Project, an extremist organization that has been identified as an anti-government hate group by the Southern Christian Leadership Conference. He has spoken at True Texas Project meetings and sessions on election strategy, and served on its advisory board. He also hosted its Christmas party in 2019. And, in July 2024, he appeared onstage at a True Texas Project conference, which included events such as “The War on White America.” Multiple Republican speakers pulled out due to concerns over the conference’s racism. Travis County Republican Party Chair Matt Mackowiak urged that “[e]very good and [decent] and honorable person associated with this event should back out. Right now. This moment.” Nevertheless, O’Hare still appeared at the conference.

146. O’Hare remains close with two True Texas Project executives, who made comments justifying the mass shooting of 23 Hispanic victims at a Walmart in El Paso.

147. Commissioner Krause has also spoken at True Texas Project meetings and touted receiving its endorsement.

148. Defendant O’Hare’s discriminatory stances and statements extend to his brusque treatment of Commissioner Simmons, the only Black woman Commissioner. When presiding as County Judge on April 16, 2024, Defendant O’Hare asked Commissioner Simmons a question; less than ten seconds after asking, he interrupted Commissioner Simmons’s response, saying, “I’m

the one talking now so you'll sit there and be quiet and listen while I talk." Defendant O'Hare later told Commissioner Simmons, "Have a semblance of class. That's all you have to do. Just a semblance." On January 28, 2025, Defendant O'Hare told Commissioner Simmons, "You are simply the most classless person we've ever had sitting on this dais." Black members of the community, including the local NAACP, have spoken out against Defendant O'Hare's treatment of Commissioner Simmons, which many view as racially motivated. For example, one community member said, "This is not about political party or affiliation. . . . This is about a judge who chooses to disrespect, repeatedly, a colleague who happens to be African-American and a woman."

149. Against this backdrop of hostility to Latino and Black residents and their concerns, Defendant O'Hare's claim that partisanship alone motivated Defendants' unprecedented mid-decade redistricting decision rings hollow. Instead, it is a mere smokescreen for racial discrimination.

## **VI. CAUSES OF ACTION**

### **Count One:**

#### **Secret Walking Quorum Meetings in Violation of the Texas Open Meetings Act**

150. Plaintiffs incorporate and adopt by reference the allegations in each and every preceding paragraph of this petition.

151. Governmental immunity does not apply to this claim because the Texas Open Meetings Act ("TOMA"), as codified at Chapter 551 of the Texas Government Code, unambiguously waives governmental immunity from suits seeking injunctive and mandamus relief. *Town of Shady Shores v. Swanson*, 590 S.W.3d 544, 554 (Tex. 2019).

152. TOMA requires that meetings of every "governmental body" be "open to the public," including commissioners court meetings. Tex. Gov't Code §§ 551.001(3), 551.002.

153. TOMA prohibits “walking violations,” which occur when a member of the governing body

(1) “knowingly engages in at least one communication among a series of communications that each occur outside of a meeting authorized by this chapter and that concern an issue within the jurisdiction of the governmental body in which the members engaging in the individual communications constitute fewer than a quorum of members but the members engaging in the series of communications constitute a quorum of members”; and

(2) “knew at the time . . . that the series of communications:

(A) involved or would involve a quorum; and

(B) would constitute a deliberation once a quorum of members engaged in the series of communications.”

Tex. Gov’t Code § 551.143. In this context, a “deliberation” is “a verbal or written exchange between a quorum of a government body,” or “between a quorum of a governmental body and another person, concerning an issue within the jurisdiction of the government body.” *Id.* § 551.001(2).

154. A TOMA “walking quorum” violation can be established in part through evidence of “rubber stamping,” suggesting “*pro forma* public approval . . . by the governing body of matters already determined in closed meetings.” See *Willmann v. City of San Antonio*, 123 S.W.3d 469, 480 (Tex. App.—San Antonio 2003, pet. denied).

155. On information and belief, and with the intention of enacting a racially discriminatory map, Defendants violated the TOMA “walking quorum” prohibition in adopting Map 7 by engaging in a series of closed meetings, constituting a quorum, in which they voiced their various redistricting priorities, discussed the various map proposals, and secretly coalesced around Map 7, leading up to the *pro forma* public approval of Map 7 despite no prior public discussion on the merits of Map 7 as opposed to the other proposed maps. Defendants’ TOMA



violation unlawfully shut out residents of Tarrant County from participating in the redistricting and effectively disregarded the voices of Black and Latino voters, including Plaintiffs' members.

**Count Two:  
Redistricting in Violation of Article V, Section 18 of the Texas Constitution**

156. Plaintiffs incorporate and adopt by reference the allegations in each and every preceding paragraph of this petition.

157. Governmental immunity does not apply to this claim, as Defendants do not possess immunity for violations of the Texas constitution. *See, e.g., City of Fort Worth v. Jacobs*, 382 S.W.3d 597, 598 (Tex. App.—Fort Worth 2012, pet. dismissed) (citing *City of Beaumont v. Bouillion*, 896 S.W.2d 143, 148–49 (Tex. 1995); *City of Elsa v. M.A.L.*, 226 S.W.3d 390, 391–92 (Tex. 2007)).

158. Article V, Section 18 of the Texas Constitution lays out the process for dividing commissioners precincts in Texas, including the requirement that every county “according to the most recent federal census, from time to time, for the convenience of the people, shall be divided into” precincts. Tex. Const. art. V, § 18(a) (emphasis added).

159. Accordingly, “the commissioners court was given some discretion to meet the ‘changing needs of the people’ but such must be ‘exercised in good faith and without fraud, not arbitrarily, nor in gross abuse of discretion.’” *Avery v. Midland County*, 406 S.W.2d 422, 427 (Tex. 1966), *vacated on other grounds*, 390 U.S. 474 (1968).

160. Thus, redistricting of commissioners precincts must be performed “in a reasonably fair and just manner” and “with due regard to the convenience of the people.” *Hatter v. Worst*, 390 S.W.2d 293, 296–97 (Tex. App.—Amarillo 1965, writ refused n.r.e.).

161. The redistricting via adoption of Map 7 was not done “in a reasonably fair and just manner” because Defendants failed entirely to consider the convenience of Tarrant County voters.

The redistricting and adoption of Map 7 was instead undertaken for the purpose of racial discrimination and weakening the voting strength of Tarrant County minority voters, including Plaintiffs' members.

162. Even if the Court accepts Defendants' publicly stated rationale for redistricting, total population equality and partisan advantage—both of which are evidently belied by the facts—the redistricting was still undertaken without due regard to the convenience of the people as the process was completely divorced from traditional redistricting principles and factors traditionally related to “the convenience of the people.”

163. Defendants also abused their discretion as prohibited by this Section because they acted in violation of TOMA and other laws. *See, e.g., Medina Cnty. Com'rs Court v. Integrity Group, Inc.*, 21 S.W.3d 307, 309 (Tex. App.—San Antonio 1999, pet. denied) (“If the commissioners court acts illegally, unreasonably, or arbitrarily, a district court may find an abuse of discretion.”)

**Count Three:  
Racial Discrimination in Violation of  
Section 106.001 of the Texas Civil Practice and Remedies Code**

164. Plaintiffs incorporate and adopt by reference the allegations in each and every preceding paragraph of this petition.

165. Governmental immunity does not apply to this claim, as Section 106.002(a) of the Texas Civil Practice and Remedies Code specifically waives that immunity.

166. Section 106.001 provides: “An officer or employee of . . . a political subdivision of the state who is acting or purporting to act in an official capacity may not, because of a person's race, religion, color, sex, or national origin . . . impose an unreasonable burden on the person.” Tex. Civ. Prac. Rem. Code § 106.001(a)(6).

167. The Adopted Map 7 imposes an unreasonable burden on many Black and Latino voters, including Plaintiffs' members, disproportionately impacting them by eliminating one of two precincts in which they were able to elect their preferred candidate because of racially polarized voting, and causing adverse effects due to the loss of a commissioner that adequately represents their interests.

168. The Adopted Map 7 imposes an unreasonable burden on many Black and Latino voters, including Plaintiffs' members, disproportionately shifting them from a precinct with a 2026 election to a precinct with a 2028 election, causing adverse effects due to a denied opportunity to participate in the political process.

**Count Four:  
Intentional Racial Discrimination in Violation of  
Article I, Sections 3 and 3a of the Texas Constitution**

169. Plaintiffs incorporate and adopt by reference the allegations in each and every preceding paragraph of this petition.

170. Governmental immunity does not apply to this claim, as Defendants do not possess immunity for violations of the Texas constitution. *See, e.g., Jacobs*, 382 S.W.3d at 598 (citing *Bouillion*, 896 S.W.2d at 148–49; *M.A.L.*, 226 S.W.3d at 391–92).

171. Article I, Section 3 of the Texas Constitution provides that “no man, or set of men, is entitled to exclusive separate public emoluments, or privileges” and guarantees a free and equal vote in Texas elections. *See Burroughs v. Lyles*, 42 Tex. 704, 712 (Tex. 1944) (stating that “Article I, Section 3, of the Constitution guarantees to all persons equality of rights” which “also applies to political rights”); *Del Valle Indep. Sch. Dist. v. Lopez*, 863 S.W.2d 507, 515 (Tex. App. — Austin, 1993, writ denied) (allowing voting-rights claims under Article I, Sections 3 and 3a).

172. Article I, Section 3a prohibits the state from denying or abridging the right to “equality under the law” on the basis of “sex, race, color, creed, or national origin.”

173. Map 7 was adopted by the Commissioners Court with the intent to discriminate on the basis of race and national origin, and has a discriminatory effect on that basis, by the intentional dismantling of Precinct 2 as a performing majority-minority precinct through the cracking of Black and Latino voting blocs and the packing of Black and Latino voters, including Plaintiffs' members, into other precincts in which they will have no opportunity to elect their preferred candidate because of racially polarized voting.

**Count Five:  
Temporary Disenfranchisement in Violation of  
Article I, Sections 3 and 3a of the Texas Constitution**

174. Plaintiffs incorporate and adopt by reference the allegations in each and every preceding paragraph of this petition.

175. As stated above, governmental immunity does not apply to this claim, as Defendants do not possess immunity for violations of the Texas constitution. *See, e.g., Jacobs*, 382 S.W.3d at 598 (citing *Bouillion*, 896 S.W.2d at 148–49); *M.A.L.*, 226 S.W.3d at 391–92.

176. Article I, Section 3 of the Texas Constitution provides that “no man, or set of men, is entitled to exclusive separate public emoluments, or privileges” and guarantees a free and equal vote in Texas elections. *See Burroughs*, 42 Tex. at 712; *Del Valle Indep. Sch. Dist.*, 863 S.W.2d at 515.

177. Article I, Section 3a prohibits the state from denying or abridging the right to “equality under the law” on the basis of “sex, race, color, creed, or national origin.”

178. Map 7 was adopted by the Commissioners Court with the intent to discriminate on the basis of race and national origin, and has a discriminatory effect on that basis, through the disproportionate temporary disenfranchisement of Black and Latino voters who were shifted from a precinct with a 2026 election into a precinct with a 2028 election, which includes Plaintiffs' members.

## VII. CONDITIONS PRECEDENT

179. All conditions precedent to Plaintiffs' claims for relief have been performed or have occurred.

## VIII. REQUEST FOR DISCLOSURE

180. Plaintiffs request that Defendants disclose, within 50 days of the service of this request, the information or material described in Texas Rules of Civil Procedure 194.2.

## IX. PRAYER

WHEREFORE, considering the law and facts alleged in this Petition, Plaintiffs pray this Court grant the following relief:

- A. Temporarily and permanently enjoin Defendants from implementing the Adopted Map;
- B. Temporarily and permanently enjoin Defendants from calling, holding, supervising, or certifying any elections under the Adopted Map;
- C. Reinstate the Tarrant County commissioner precinct boundary map upheld in 2021 based on the most recent Census (the Original Map);
- D. Award Plaintiffs their reasonable attorneys' fees and costs pursuant to statute; and
- E. Grant any additional or alternative relief to which Plaintiffs may be entitled.

Respectfully submitted this 14th day of August, 2025.

/s/ Nina L.M. Oishi

Nina L.M. Oishi

### TEXAS CIVIL RIGHTS PROJECT

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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I certify that on August 14, 2025, a true and correct copy of the foregoing document was served on the following Defendants pursuant to the Texas Rules of Civil Procedure:

DEFENDANT TARRANT COUNTY, TEXAS  
County Judge Tim O'Hare  
100 East Weatherford Street, Suite 501  
Fort Worth, Texas 76196

DEFENDANT TARRANT COUNTY COMMISSIONERS COURT  
County Judge Tim O'Hare  
100 East Weatherford Street, Suite 501  
Fort Worth, Texas 76196

DEFENDANT COUNTY JUDGE TIM O'HARE  
100 East Weatherford Street, Suite 501  
Fort Worth, Texas 76196

TARRANT COUNTY DISTRICT ATTORNEY PHIL SORRELLS  
Tim Curry Criminal Justice Center  
401 West Belknap  
Fort Worth, TX 76196  
ATTORNEY FOR DEFENDANTS

*/s/ Nina L.M. Oishi*  
Nina L.M. Oishi

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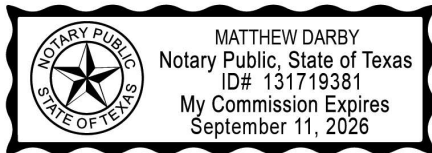


**Notary Verification**

STATE OF TEXAS           §  
COUNTY OF DALLAS      §

Alberto Govea personally appeared before me, and being first duly sworn declared that he signed this declaration in the capacity designated, if any, and further states that he has read the attached Original Verified Petition and the statements contained in the paragraphs designated herein are true.

Sworn and subscribed before me on August 13, 2025. This notarial act was an online notarization with electronic signatures.



*Matthew Darby*

\_\_\_\_\_  
Notary Public, State of Texas

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Cause No. \_\_\_\_\_

|  |   |                                 |
|--|---|---------------------------------|
| <b>LEAGUE OF UNITED LATIN</b>            | § | <b>IN THE DISTRICT COURT OF</b> |
| <b>AMERICAN CITIZENS OF FORT</b>         | § |                                 |
| <b>WORTH, COUNCIL 4568, and</b>          | § | <b>TARRANT COUNTY, TEXAS</b>    |
| <b>LEAGUE OF WOMEN VOTERS OF</b>         | § |                                 |
| <b>TARRANT COUNTY,</b>                   | § | <b>__ JUDICIAL DISTRICT</b>     |
| <b><i>Plaintiffs,</i></b>                | § |                                 |
|  | § |                                 |
| <b>v.</b>                                | § |                                 |
|  | § |                                 |
| <b>TARRANT COUNTY, TARRANT</b>           | § |                                 |
| <b>COUNTY COMMISSIONERS</b>              | § |                                 |
| <b>COURT, and COUNTY JUDGE TIM</b>       | § |                                 |
| <b>O'HARE, in his official capacity,</b> | § |                                 |
| <b><i>Defendants.</i></b>                | § |                                 |


---

**Declaration of Janet Mattern**

Pursuant to Texas Rule of Civil Procedure 682, I, Janet Mattern, declare that:

My name is Janet Mattern. I am over eighteen years of age, am of sound mind, and am capable of making this declaration. I am President of the League of Women Voters of Tarrant County.

I have read the above Original Verified Petition. I verify that the facts stated set forth in paragraphs 25-28, 124, and 127 are within my personal knowledge and are true and correct.

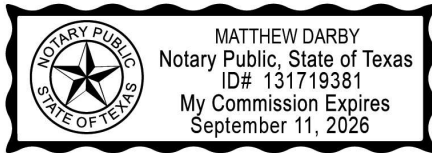
  
\_\_\_\_\_  
Janet Mattern,  
President of the League of Women  
Voters of Tarrant County

**Notary Verification**

STATE OF TEXAS           §  
COUNTY OF DALLAS       §

Janet Mattern personally appeared before me, and being first duly sworn declared that she signed this declaration in the capacity designated, if any, and further states that she has read the attached Original Verified Petition and the statements contained in the paragraphs designated herein are true.

Sworn and subscribed before me on August 13, 2025. This notarial act was an online notarization with electronic signatures.



*Matthew Darby*

\_\_\_\_\_  
Notary Public, State of Texas

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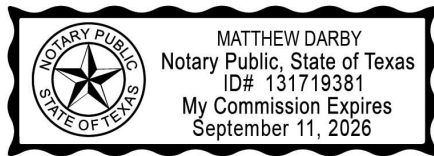


**Notary Verification**

STATE OF TEXAS           §  
COUNTY OF DALLAS      §

Mark P. Jones personally appeared before me, and being first duly sworn declared that he signed this declaration in the capacity designated, if any, and further states that he has read the attached Original Verified Petition and the statements contained in the paragraphs designated herein are true.

Sworn and subscribed before me on August 13, 2025. This notarial act was an online notarization with electronic signatures.



*Matthew Darby*

\_\_\_\_\_  
Notary Public, State of Texas

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## Automated Certificate of eService

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Renetta Parham on behalf of Nina Oishi  
Bar No. 24142250  
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Envelope ID: 104366857  
Filing Code Description: Petition  
Filing Description: Plaintiffs' Original Verified Petition  
Status as of 8/14/2025 12:42 PM CST

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| Sara Chen        |           | schen@texascivilrightsproject.org      | 8/14/2025 10:14:39 AM | SENT   |
| Sara Chen        |           | schen@texascivilrightsproject.org      | 8/14/2025 10:14:39 AM | SENT   |