

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

	)	
GOLDEN BETHUNE-HILL, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	Civil Action No. 3:14-cv-852
VIRGINIA STATE BOARD OF	)	
ELECTIONS, <i>et al.</i> ,	)	
	)	
Defendants,	)	
	)	
	)	

**INTERESTED PARTY VIRGINIA STATE CONFERENCE OF NAACP BRANCHES  
RESPONSE TO COURT’S NOVEMBER 15, 2018 ORDER**

Pursuant to this Court’s Order of November 15, 2018, ECF 298, requiring Interested Party Virginia State Conference of NAACP Branches (“the Virginia NAACP”) to submit a new block equivalency file for its proposed remedy plan that is formatted as a simple text file instead of an excel spreadsheet, the Virginia NAACP respectfully notifies the Court that it has, today, via overnight FedEx, sent a hard copy CD-ROM containing the Shapefiles and text file Block Equivalency files to the Court, the parties, and the Department of Legislative Services. That file is in a folder labeled “Files Requested by Court on November 15 2018.”

In addition to amended file requested by the Court on November 15, 2018, the Virginia NAACP also submitted, on that same hard copy CD-ROM, an adjusted remedial plan for the Court’s consideration that uses the corrected census block data. As the Virginia NAACP stated in its Notice to Court on Friday, November 16, 2018, ECF 303, counsel for the Virginia NAACP

discovered an error relating to the data for two census blocks (Block 51710 0038.001000 and Block 51710 0009.02 1044) located in the Norfolk area in Districts 79 and 89. The Virginia NAACP was able to correct this technical Census Bureau error in the Virginia NAACP's proposed remedial plan by making minor adjustments to only those two districts. These limited corrections are provided to the Court in a second folder on the same hard copy CD-ROM, labeled "NAACP Plan with Census Block Issue Corrected." Maps and statistical information about these two corrected districts are attached as Exhibits A, B, and C. Exhibit D contains a notice from the Census Bureau acknowledging the census block assignment error.<sup>1</sup>

The Virginia NAACP respectfully requests that the Court consider the Virginia NAACP's amended districts in the Norfolk area, designed to address the corrections issued by the Census Bureau. In the alternative, should the Court not accept this amended plan, the Virginia NAACP respectfully requests that the Court and special master consider the rest of the proposed remedial plan timely submitted by the Virginia NAACP on November 2, 2018, ECF 286.

Submitted this 19th day of November, 2018.

/s/ David O. Prince

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<sup>1</sup> This notice is also available at [https://www.census.gov/rdo/pdf/VA\\_errata.pdf](https://www.census.gov/rdo/pdf/VA_errata.pdf).

*Counsel for the Virginia NAACP*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of November, 2018, I have electronically filed the foregoing document with the Clerk of Court using the United States District Court, Eastern District of Virginia, Richmond Division, CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record, including Plaintiffs, Defendants, and Defendant-Intervenors.

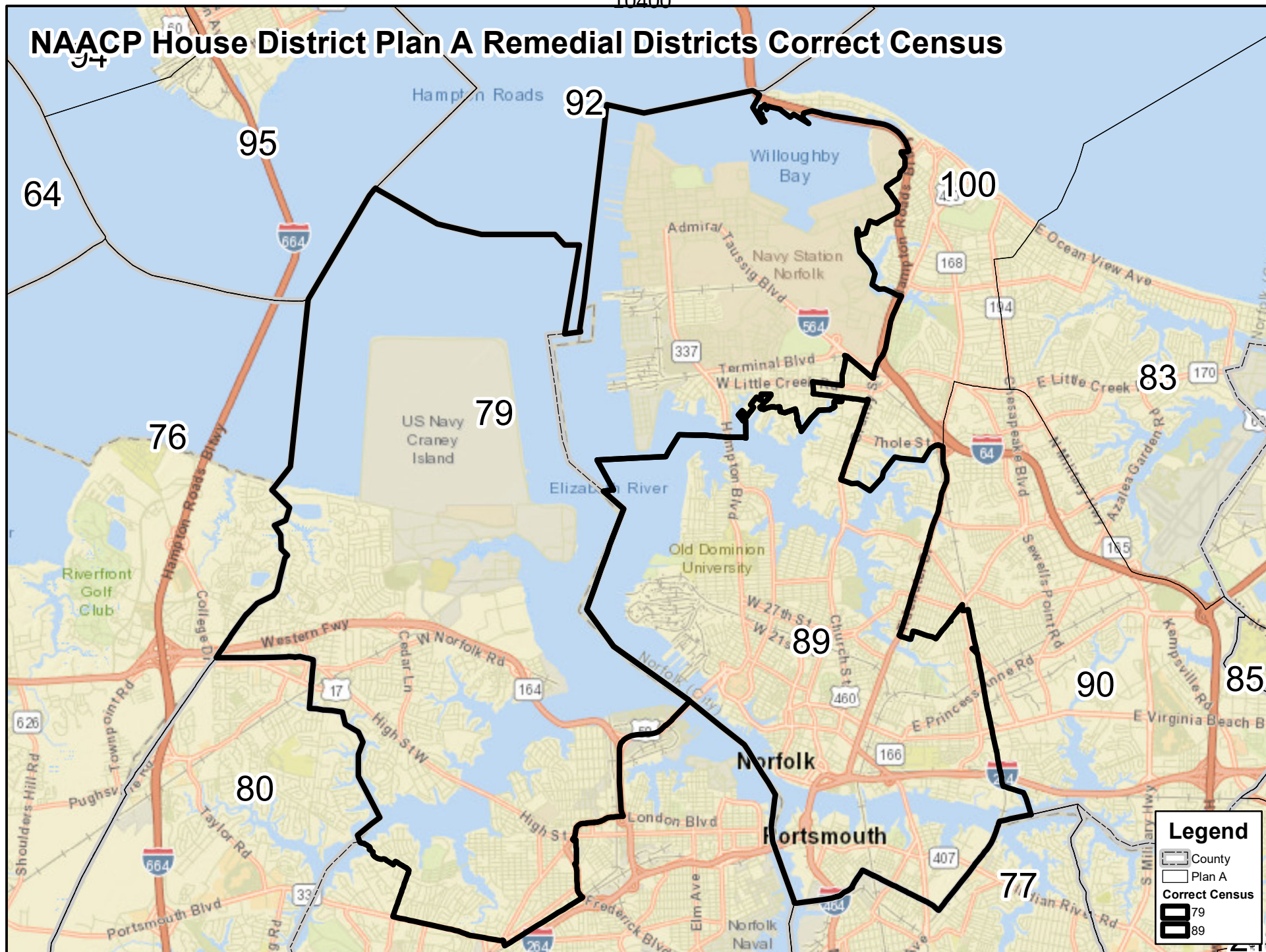
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# APPENDIX A

District	Population	18+_Pop	% Deviation	% NH18+_Wht	% NH18+_Blk	% H18+_Pop	% NH18+_Asn
27	79,287	58,901	-0.90%	63.13%	24.84%	7.28%	2.95%
62	79,248	60,326	-0.95%	49.99%	43.12%	3.46%	0.89%
63	79,229	62,309	-0.98%	35.92%	57.49%	3.82%	0.89%
69	79,224	61,953	-0.98%	34.63%	49.46%	11.83%	2.20%
70	79,557	59,794	-0.57%	41.45%	45.66%	8.14%	2.70%
71	79,237	65,398	-0.97%	42.70%	49.12%	2.36%	3.52%
74	80,604	61,065	0.74%	47.35%	41.79%	2.96%	6.16%
76	79,379	58,373	-0.79%	52.35%	41.97%	2.45%	1.69%
77	80,541	58,924	0.66%	44.86%	46.65%	4.57%	1.82%
80	80,762	60,992	0.94%	44.60%	49.02%	2.65%	1.76%
85	80,099	60,552	0.11%	55.75%	28.12%	6.72%	6.49%
<b>89</b>	<b>80,808</b>	<b>62,908</b>	<b>1.00%</b>	<b>42.41%</b>	<b>52.12%</b>	<b>3.02%</b>	<b>3.09%</b>
90	80,414	61,317	0.50%	43.00%	44.91%	5.31%	4.24%
92	79,344	61,999	-0.83%	35.16%	56.16%	3.92%	1.93%
94	79,738	60,994	-0.34%	59.59%	28.13%	6.22%	3.15%
95	79,762	60,435	-0.31%	40.37%	49.45%	5.63%	2.01%

# APPENDIX B

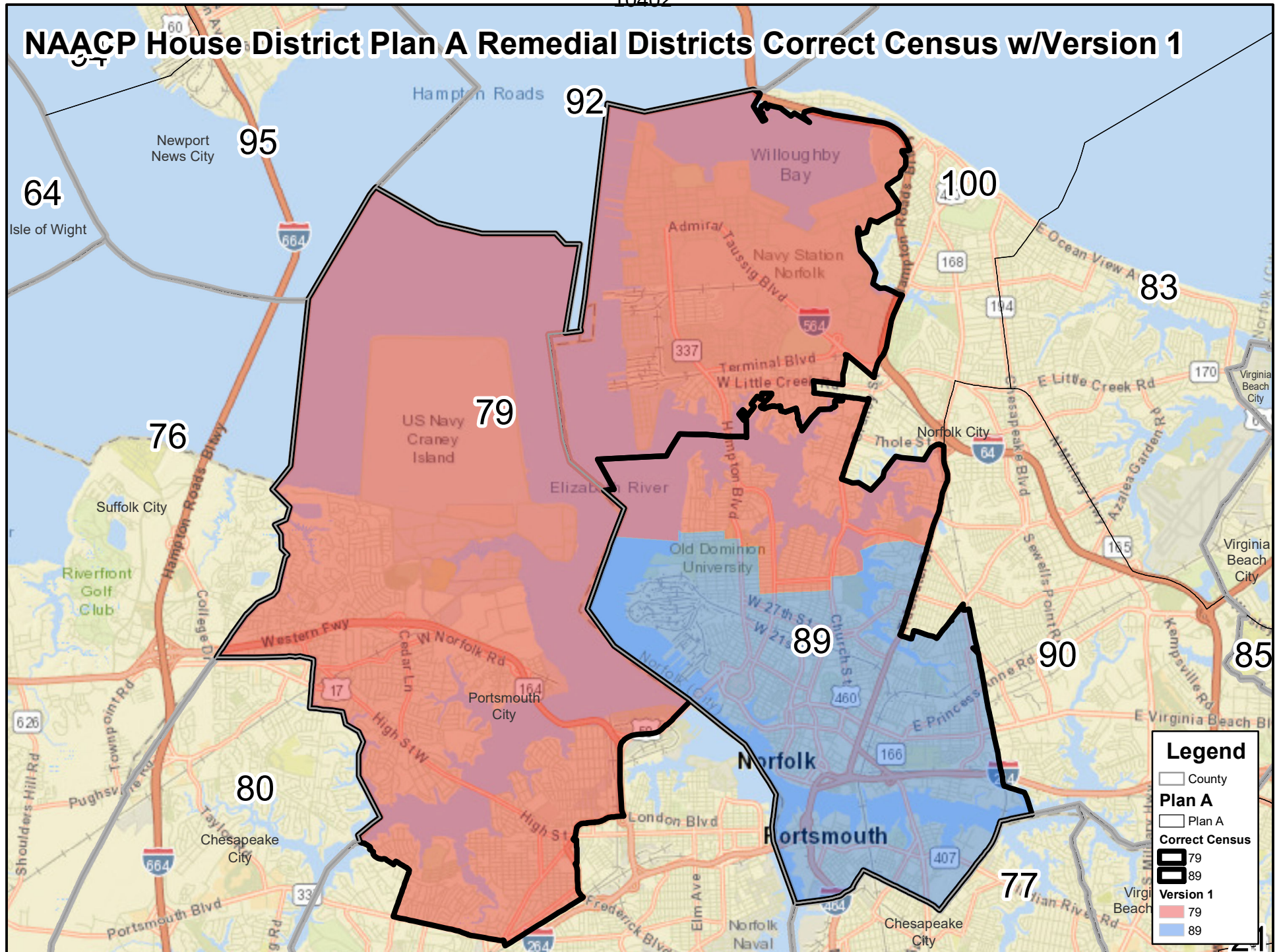
# NAACP House District Plan A Remedial Districts Correct Census





# APPENDIX C

# NAACP House District Plan A Remedial Districts Correct Census w/Version 1



# APPENDIX D

**NOTE: Change to the Virginia 2010 P.L. 94-171 Summary File data as delivered**

We were recently alerted to an error with the census block level population counts in the Norfolk area following the release of the Public Law (P.L.) 94-171 data for the Commonwealth of Virginia.

State and municipal officials discovered this error when they began analyzing the data for the Norfolk area and noticed that a census block, which should have contained a large portion of the Norfolk Naval Station, was showing a population of approximately 20,000 fewer people than projected. Moreover, a nearby census block contained a much higher population than anticipated.

The U.S. Census Bureau determined that this error was the result of a geocoding discrepancy. Such discrepancies can occur when a living quarter, such as a house, apartment, or military vessel, is placed in an incorrect location. In this instance, ships ported at the Norfolk Naval Station were incorrectly located in Block 51710 0038.001000. These ships correctly belong in Block 51710 0009.02 1044, approximately three miles to the north of the incorrect block.

The Census Bureau has provided new population counts that enable data users to correct the census populations for these two blocks. The enclosed errata table shows the updated population counts for the two blocks affected by this error. We are also transmitting this updated block information by mail to the Virginia General Assembly. We will post errata notices on both our Redistricting Data Program Web site and the American FactFinder, the 2010 Census dissemination Web site.

This new information should allow the City of Norfolk, the General Assembly, and other data users to correct for the error in the P.L. 94-171 data, as well as subsequent data products. Based on discussions with representatives from the General Assembly, we are confident that this solution will enable the General Assembly to proceed with redistricting on schedule.

Norfolk Errata

	Corrected Block 51710 0038.00 1000	Corrected Block 51710 0009.02 1044	Original (PL) Block 51710 0038.00 1000	Original (PL) Block 51710 0009.02 1044
<b>RACE</b>				
Universe: Total population				
Total	73	19,279	19,352	0
White alone	37	11,702	11,739	0
Black or African American alone	20	5119	5,139	0
American Indian and Alaska Native alone	0	202	202	0
Asian alone	11	679	690	0
Native Hawaiian and Other Pacific Islander alone	1	73	74	0
Some Other Race alone	3	784	787	0
Population of Two or More Races	1	720	721	0
<b>HISPANIC OR LATINO, AND NOT HISPANIC OR LATINO</b>				
Universe: Total population				
Total	73	19,279	19,352	0
Hispanic or Latino	6	2,584	2,590	0
Not Hispanic or Latino	67	16,695	16,762	0
<b>RACE FOR THE POPULATION 18 YEARS AND OVER</b>				
Universe: Total population 18 years and over				
Total	69	19,278	19,347	0
White alone	33	11,702	11,735	0
Black or African American alone	20	5118	5,138	0
American Indian and Alaska Native alone	0	202	202	0
Asian alone	11	679	690	0
Native Hawaiian and Other Pacific Islander alone	1	73	74	0
Some Other Race alone	3	784	787	0
Population of Two or More Races	1	720	721	0
<b>HISPANIC OR LATINO, AND NOT HISPANIC OR LATINO BY FOR THE POPULATION 18 YEARS AND OVER</b>				
Universe: Total population 18 years and over				
Total	69	19,278	19,347	0
Hispanic or Latino	6	2,584	2,590	0
Not Hispanic or Latino	63	16,694	16,757	0
<b>OCCUPANCY STATUS</b>				
Universe: Housing units				
Total:	5	0	5	0
Occupied	5	0	5	0
Vacant	0	0	0	0