

STATE OF NEW YORK
SUPREME COURT COUNTY OF ONONDAGA

CHRISTOPHER RYAN; DUSTIN CZARNY;
CHARLES GARLAND; WILLIAM KINNE; MARY
KUHN; LINDA ERVIN; PEGGY CHASE; HELEN
HUDSON; MICHAEL GREENE; MARK F. MATT;
MAX RUCKDESCHEL; MARCIA FERGUSON; and
CHRISTOPHER J. SHEPHERD

Plaintiffs,

vs.

RYAN MCMAHON; COUNTY OF ONONDAGA;
ONONDAGA COUNTY LEGISLATURE; and
ONONDAGA COUNTY BOARD OF ELECTIONS,

Defendants.

**AFFIDAVIT OF
CHARLES GARLAND**

Charles Garland, being duly sworn, says under penalty of perjury as follows:

1. I am a Plaintiff in the above-captioned action and a citizen of the State of New York, residing in the City of Syracuse, County of Onondaga.
2. I make this affidavit based on my personal knowledge, and if called upon to testify, I could and would testify to the following facts.
3. I am registered to vote in the County of Onondaga, State of New York.
4. I reside in that portion of the City of Syracuse which will be part of the 16th Onondaga County Legislative District as part of the 2021 Redistricting Maps that have been passed into law by the Republican Majority of the County Legislature.
5. Additionally, I serve as a Democratic Legislator for the 16th District in the Onondaga County Legislature.
6. I submit this Affidavit in opposition to the Redistricting Maps that have been offered by the Onondaga County Legislature.

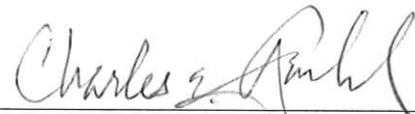
7. The 16th Legislative District was, prior to the 2021 Redistricting Plan, a District that spanned most of Syracuse's South Side.
8. The South Side of Syracuse is a mostly African American community and Syracuse has the highest rate of poverty for African Americans and Hispanics of any of the nation's 100 largest metropolitan areas,
9. Greater than 60% of all the African American citizens who live in Onondaga County live in the South side of Syracuse in what has been identified as a high poverty area.
10. The reason why Syracuse's African American Community is so geographically concentrated has long historical antecedents that date back to at least 1919 when the then City of Syracuse Engineer, Henry C. Allen, prepared a map of the city in which portions of the city were designated the "NEGRO" section.
11. As early as 1934 the fact of redlining Syracuse's South Side as "Definitely Declining" and "Hazardous" was documented in the "Homeowners Loan Corporation Maps" which prescribed where homes would be sold in Syracuse to White and African American families.
12. These uncomfortable facts resulted in a high concentration of African American families in the City of Syracuse's South Side.
13. An unintended byproduct of that designed concentration of poverty and community of same colors is that where people who share common grievances reside, comes common purpose, and is the very definition of a community of interest.
14. The community of African American Syracusans has developed into a political reality in which the South Side community had become a voting block in which African American

candidates, such as myself, could be elected to office and become the voice of the African American community in the Onondaga County Legislature.

15. In response to that concentration of African American voting power the Republican majority of the County Legislature passed into law Redistricting Maps that politically divide the African American community and robbed the African American community of the single political benefit of redlining.
16. The African American community of Syracuse has been the victim of maps drawn by the white power structure in Syracuse since at least 1919 and remains the victim of maps today with the Redistricting Maps prepared by the Republican majority of the Onondaga County Legislature.
17. In short, the African American community is now politically divided by the new maps.
18. In the past, the African American community was created by those who used maps to isolate the African American community.
19. What happened a hundred years ago is happening again with these new maps.
20. It was for that reason, I and others spoke out about the disservice those maps did to the African American community.
21. In response to our complaints, on December 3, 2021, at the request of the Onondaga County Executive, J. Ryan McMahon, and I attended a meeting in the Onondaga County Civic Center.
22. The meeting was held on the 14th Floor, interior conference room.
23. The purpose of the meeting was to discuss the newly created Onondaga County 16th District map.

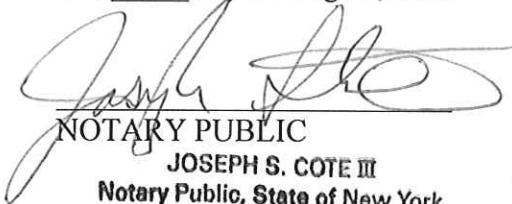
24. At the time, I complained the proposed redistricting map as it related to the 16th OCL resulted in what I considered to be Racial Gerrymandering and an unnecessary fracturing of the prior 16th district
25. In attendance were, Onondaga County Executive J. Ryan McMahon, II, me, David Rufus, Charlene Tarver, Lori Torolli, Susan Stanzyk, Travis Glazier and County legislators, Linda Ervin, Christopher Ryan and David Knapp.
26. During this meeting, in response to my concerns of racial gerrymandering Travis Glazier, made statements which revealed he was the person who had created the Republican Maps.
27. Mr. Glazier also revealed the fact that he was tasked with creating a “minority” district for the County Legislature in place of the existing African American majority district.
28. He also admitted that he thus redrew the 16th District in which other minority communities were added into the 16th District as portions of the African American community was removed from the 16th District.
29. In making these admissions, Mr. Glazier showed me maps on his laptop and spreadsheets spread out before him, said directly to me, he was sorry for dividing Syracuse’s African American community, saying “When I was given the task of making the maps, I was not told that all minorities are not the same”
30. This admission revealed he did not understand the African American community that had existed in the prior 16th Legislative District was a community of interest assuming all minority groups are part of the same community of interest.
31. This admission reveals a fundamental misunderstanding of what constitutes a community of interest and a misunderstanding of how race, ethnicity, and economic status combine to

create communities of interest that should not be divided when performing the task of creating legislative districts as part of a logical, nonpartisan process of redistricting.



CHARLES GARLAND

Sworn before me on
this 16th day of August, 2022



NOTARY PUBLIC

JOSEPH S. COTE III

Notary Public, State of New York

Qualified in Onondaga Co. No. 4942588

Commission Expires

5/26/2023