

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
(SOUTHERN DIVISION)**

BOBBY SINGLETON, *et al.*,

Plaintiffs,

v.

WES ALLEN, in his official capacity as
Alabama Secretary of State, et al.,

Defendants.

Civil Action No. 2:21-cv-1291-AMM

THREE-JUDGE COURT

EVAN MILLIGAN, *et al.*,

Plaintiffs,

v.

WES ALLEN, in his official capacity as
Alabama Secretary of State, et al.,

Defendants.

Civil Action No. 2:21-cv-01530-AMM

THREE-JUDGE COURT

MARCUS CASTER, *et al.*,

Plaintiffs,

v.

WES ALLEN, in his official capacity as
Alabama Secretary of State, et al.,

Defendants.

Civil Action No. 2:21-cv-01536-AMM

EXPERT REPORT OF DR. WILFRED REILLY

I. Credentials and Qualifications

I am an Associate Professor of Political Science at Kentucky State University, a historically Black institution. I hold a PhD from Southern Illinois University (awarded 2015) and a law degree from the University of Illinois (2005): my focus fields, per the PhD and in my current teaching, are Public Law, International Relations, and Political Theory. At “KYSU,” I regularly teach in the areas of Constitutional law, criminal law, statistical methodology, and research methodology. I am also, perhaps unsurprisingly, expected to write, and am the author of the books *Hate Crime Hoax* (2019) and *Taboo* (2020) – along with two other books.

A focus of my research, as a statistician, is examining the effect of multivariate regression analyses which incorporate large-N datasets on the outcome gaps between American racial groups which are often used to argue for the continuing or unchanged existence of “systemic racism¹” – or even for the genetic inferiority of certain races by the bizarre alt-right.² I very often find that such gaps are reduced quite significantly, or even are eliminated entirely, when other relevant variables are (1) actually taken into account and (2) properly adjusted for.

I have published fairly extensively, on this topic and others. During the past 365-day year, I have been – in addition to an accepted (popular press) solo book manuscript³ – a contributor to a major article recently published in *The Proceedings of the National Academy of*

¹ See, for example: Kendi, Ibram. 2023 (ed.). *How to Be and Anti-Racist*. New York: One World Press - <https://www.amazon.com/dp/0525509305/>.

² For a good early overview of this movement, see: Swain, Carol. 2004. *The New White Nationalism in America: It's Challenge to Integration*. Cambridge (UK): Cambridge University Press - <https://www.amazon.com/New-White-Nationalism-America-Integration/dp/0521545587>.

³ Reilly, Wilfred. 2024. *Lies My Liberal Teacher Told Me*. New York: Bombardier/Harper Collins - https://www.amazon.com/Lies-My-Liberal-Teacher-Told/dp/0063265974/ref=sr_1_1?crid=4N9X9XDQGDD6&keywords=lies+my+liberal+teacher+told+me&qid=1703200620&srefix=lies+my+libe%2Caps%2C126&sr=8-1.

the Sciences (PNAS),⁴ an author on a quantitative piece in *Administration and Society*,⁵ and the author of an article in *Middle West Review*.⁶ More broadly, my writing has appeared during the past several years in *Commentary*, *Quillette*, *Academic Questions*, *Newsweek*, *National Review*, *Tablet*, and a range of other journals and periodicals.

I am being compensated for my work related to this case at the rate of \$500 (U.S.) dollars per hour. This rate is in no way dependent on my findings, which I reserve the full and complete right to adjust. My full curriculum vitae is attached to this report.

II. Introduction

An argument made by the plaintiffs in *Milligan v. Allen*, *Caster v. Allen*, and *Singleton v. Allen* is that a second majority-Black Congressional district is needed in the state of Alabama, and that various commonalities between the city of Mobile and the counties of the Alabama “Black Belt” – generally given as: Barbour, Bullock, Butler, Choctaw, Crenshaw, Dallas, Greene, Hale, Lowndes, Macon, Marengo, Montgomery, Perry, Pickens, Pike, Russell, Sumter, and Wilcox⁷ – create a “community of interest” which makes their combination into a single unified district logical. Several reports by plaintiffs’ experts, most notably the Moorer report, argue specifically that the city of Mobile shares more characteristics with rural Black Belt counties that with Mobile County itself and with closely neighboring and long-aligned Baldwin County.

⁴ Clark, Cory J., Lee Jussim, Komey Frey... (Wilfred Reilly), Von Hippel et al. 2023. “Pro-Social Motives Underlie Scientific Censorship by Scientists: a Perspective and Research Agenda.” *Proceedings of the National Academy of Sciences (PNAS)*. 120 (48): <https://www.pnas.org/doi/10.1073/pnas.2301642120>.

⁵ Maranto, R., Reilly, W., & Wolf, P. J. (2024). Which Police Departments Make Black Lives Matter? *Administration & Society*, 56(3), 282-303. <https://doi.org/10.1177/00953997241226892>.

⁶ Reilly, Wilfred. 2023. “Imagining Supremacy.” *Middle West Review*. 9 (2): 157-163 - <https://muse.jhu.edu/issue/49320>.

⁷ https://www.uaced.ua.edu/uploads/1/9/0/4/19045691/about_the_black_belt.pdf; [https://en.wikipedia.org/wiki/Black_Belt_\(region_of_Alabama\)](https://en.wikipedia.org/wiki/Black_Belt_(region_of_Alabama))

However, this is at very best highly debatable. Comparing recent-year (2021) “work/live” patterns in both directions indicates far more connectivity between Mobile, Mobile County, and Baldwin County than between Mobile County and any of the Black Belt counties.⁸ More sophisticated analysis across the commonly used metrics of population, population density, per capita income, and homicide/serious violent crime also indicates that far more similarities exist between Mobile, Mobile County, and Baldwin County than between Mobile and the Black Belt counties – with the sometime exception of Montgomery County. Further analysis of historical migration patterns and the structure of the current Alabama Workforce Regions continues to support the same point.

A final point to make here is that those disparities in performance or behavior that currently exist between Black and white Alabamians, and which were pointed out by plaintiffs’ experts such as Dr. Burch, cannot simply be attributed to the single variable of unique in-state bias in Alabama, and thus used *res ipsa* to establish the existence of a COI among Black Alabama residents who happen to live somewhat near one another. Racial gaps in, for example, educational attainment and crime rate exist almost literally everywhere in the United States – see, among other authors, (McWhorter 2000; Ogbu 2003; Thernstrom & Thernstrom 2003; Fryer and Levitt 2004; O’Neill 2005; Sowell 2020; Reilly 2020) for a discussion of the Black/white test score gap – and these gaps are often very very difficult to plausibly attribute to racism.

Re the two disparities just noted, Asian Americans and Black Africans often score ahead of whites on standardized board tests like the SAT,⁹ and “B/W” gaps in incarceration are often

⁸ <https://www2.labor.alabama.gov/workforcedev/CountyProfiles/Mobile%20County.pdf>

⁹ <https://reports.collegeboard.org/sat-suite-program-results>, <https://www.bestcolleges.com/research/average-sat-score-full-statistics/>

smallest in poor Southern states with a history of slavery.¹⁰ The mere existence of a performance gap does not suffice to demonstrate contemporary bias, or even a still-lingering effect of past bias, as versus the operation of any of dozens of other factors: a short list of which might include cultural variables such as fatherlessness and family structure, structural-level variables such as Great Society welfare policy,¹¹ and (to “swing left” for a bit) the plain out-sourcing of millions of American jobs in the not-too-distant past.¹²

All in all, while no one denies the troubled history of the state of Alabama or the genuine desire of some Black voters for another majority-minority district, it is difficult to argue that an increasingly sophisticated city of 200,000 has more in common with a series of small agrarian counties hundreds of miles away – which have another city located at their core – than with the large urban/suburban counties immediately adjacent to it. It is also illogical to claim that cultural or historic patterns visible for Black Americans across the entire United States indicate something unique which creates commonality within Alabama or a voting sub-region of Alabama. A cynic might say that the proposed majority-minority district likely to result from re-districting makes little sense in the context of any goal but securing more votes for the Democratic Party.

III. Scope and Outline of Report.

In my expert role, I was asked to examine and respond to the following questions:

¹⁰ Nellis, Ashley. 2021. “The Color of Justice: Racial and Ethnic Disparity in State Prisons.” The Sentencing Project. October release - <https://www.sentencingproject.org/app/uploads/2022/08/The-Color-of-Justice-Racial-and-Ethnic-Disparity-in-State-Prisons.pdf>.

¹¹ <https://www.cato.org/cato-journal/winter-2018/case-targeted-criticism-welfare-state>

¹² William Julius Wilson’s *When Work Disappears* (1997) remains a social science classic and unflinchingly addresses this point - <https://www.amazon.com/When-Work-Disappears-World-Urban/dp/0679724176>.

- 1) Are there many “shared commonalities” between Mobile (AL) and the Black Belt counties of Alabama, and are these characteristics that Mobile does not share with Mobile County and with neighboring Baldwin County?
- 2) How strong are historical ties between Mobile and the Black Belt – i.e., are many or most Mobile city residents former residents of the Black Belt?
- 3) Are disparities in rates of voter registration and voter turnout – and in variables alleged to cause or contribute to differences in voter registration and voter turnout – between black and white Alabamians best explained as a result of past or present racial discrimination, or do other factors and variables better explain such disparities?

My answers appear below.

IV. Comparing and Contrasting the Counties

One of my first observations was that residency and commuting patterns clearly link the city of Mobile, Mobile County, and Baldwin County more closely than they link this area to any other counties in the state of Alabama, including Black Belt counties. According to the 2021 Mobile County Profile issued by the Alabama Department of Labor, 71% of all commuting employees – a total of 115, 929 persons – who work in Mobile County live in the county, significantly including the city of Mobile.¹³ The next-largest bloc of regular workers within Mobile come from Baldwin County, whose residents made up 12.8% (20,888) of all employees in the city. The third largest group of workers in Mobile (2,520: 1.5% of the total) came from Jackson, Mississippi, rather than anywhere in Alabama: no generally recognized Black Belt County other than Montgomery County (903, .6%) even makes the list of the top ten contributors to the Mobile-area workforce.

¹³ <https://www2.labor.alabama.gov/workforcedev/CountyProfiles/Mobile%20County.pdf>

The same is true in several reverse directions. Where do people who LIVE in Mobile city and Mobile County work? Well, mostly in Mobile County. According to the same report, 78.2% of County residents have jobs in their home area code. Again, the next-largest group of sojourners can be found in immediately neighboring Baldwin County: 11,877 Mobile County residents, and 8% of the neighboring county's total labor force, work there. And, again, almost no one from metro Mobile travels to the economically struggling Black Belt to find work: Montgomery County is the only Black Belt county to be found among the top ten labor destinations for Mobile and Mobile County residents. There simply is not, literally speaking, much of a working relationship between the two regions.¹⁴

Figure One: Residence of Mobile County Workers

County of Residence	Number	Percentage
Mobile County, AL	115,929	71.00%
Baldwin County, AL	20,888	12.80%
Jackson County, AL	2,520	1.50%
Jefferson County, AL	2,143	1.30%
Washington County, AL	1,769	1.10%
Clarke County, AL	1,410	0.90%
Escambia County, FL	1,201	0.70%
Escambia County, AL	1,175	0.70%
Montgomery County, AL	903	0.60%
Monroe County, AL	821	0.50%
All Other Locations	14,488	8.90%
Total All Jobs (2021)	163,247	100.00%
Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics		

¹⁴ There certainly exists such a relationship, in the opposite direction, between Baldwin and Mobile Counties. Per the Baldwin County version of the report I have been citing so far, 16.6% of all persons who work in Baldwin County live in Mobile County, and fully 24.8% of all people who LIVE in BALDWIN County work in Mobile County: <https://www2.labor.alabama.gov/workforcedev/CountyProfiles/Baldwin%20County.pdf>.

The city of Mobile, Mobile County, and Baldwin County also differ from the counties of the Black Belt – with the sometime exception of Montgomery County – across a range of metrics commonly used in analysis in the social sciences, including population, “pop-density,” per capita income, and the prevalence of crime.¹⁵ At the most basic level of analysis, the first three regions are all large and densely populated urban – or at least suburban/exurban – areas. Mobile (AL) is a modern city of 183,289,¹⁶ while Mobile County is a still larger entity of 411,640 which comprises the Greater Mobile metropolitan area.¹⁷

Baldwin County is itself a “sizable populated place” of 253,507 people, which comprises the Daphne-Fairhope-Foley metropolitan area: in long-term combination with Mobile County, the two “together make up the Mobile-Daphne-Fairhope combined statistical area, with a population in 2020 of 661,964.” This entire region is densely populated: the population density of Mobile itself is 1,341 persons per square mile, that of Mobile County is 337 persons per square mile, and that of even more rural Baldwin County is 146 persons/square mile.¹⁸

In contrast, the counties of the Black Belt are by and large small and agrarian, often proudly so.¹⁹ Per the most recent data available at the time of my access, Barbour County has a total population of 24,706 and a population density of just 28.5 people per square mile. Bullock County comes in at 10,202 and 16.6, Butler County at 18,650 and 24.5, Choctaw County at 12,439 and 13.9, Crenshaw County at 13,025 and 21.7, Dallas County at 36,767 and 39.3, Greene

¹⁵ All of these metrics are used constantly in social-scientific data analysis, and appear in resources such as the Central Intelligence Agency’s World Fact-Book to facilitate comparisons between quite literally every country on Earth...<https://www.cia.gov/the-world-factbook/countries/>

¹⁶ All data in this and the immediately subsequent paragraphs is broken down in some detail in Figure Three.

¹⁷ https://en.wikipedia.org/wiki/Mobile_metropolitan_area

¹⁸ All data points outlined across the next 3-4 pages and in Figure Three come from the Census data navigator tool – [https://www.census.gov/quickfacts/facts/table\(s\)](https://www.census.gov/quickfacts/facts/table(s)). This tool was accessed between May 22 and June 10, 2024. Content visible there for each county-level and state-level area can and will change, as more 2023 and 2024 data goes up-line.

¹⁹ <https://alabamane.wscenter.com/2021/01/05/feed-your-taste-buds-need-for-adventure-in-the-alabama-black-belt/>

County at 7,422 and 11.9, Hale County at 14,595 and 23.0, Lowndes County at 9,777 and 14.4, Macon County at 18,516 and 32.1, Marengo County at 18,745 and 19.8, Perry County at 8,035 and 11.8, Pickens County at 18,697 and 21.7, Pike County at 33,014 and 49.1, Russell County (a relative giant) at 58,555 and 92.3, Sumter County at 11,853 and 13.7, and Wilcox County at 10,059 and 11.9.

Figure Two: Work Destination of Mobile County Residents

County of Employment	Number	Percentage
Mobile County, AL	115,929	78.20%
Baldwin County, AL	11,877	8.00%
Jefferson County, AL	3,639	2.50%
Montgomery County, AL	2,393	1.60%
Shelby County, AL	1,110	0.70%
Madison County, AL	1,021	0.70%
Tuscaloosa County, AL	990	0.70%
Escambia County, FL	662	0.40%
Washington County, AL	644	0.40%
Houston County, AL	536	0.40%
All Other Locations	9,411	6.30%
Total All Jobs (2021)	148,212	100.00%
Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics		

The one Black Belt county somewhat comparable with Mobile and Baldwin against these metrics is, obviously, Montgomery County (home of Montgomery, Alabama). However, even this county – with a current population of 226,361 persons – is smaller than Baldwin County and much smaller than Mobile County. Further, there is relatively little *apolitical* reason to remove

Mobile from her own metropolitan statistical area (“MSA”) and CSA in an attempt to unify her with the previously unchallenged core city of a very different geographic region. Overall, with Montgomery County removed from the mix, the average population of a Black Belt county is 19,119 and the mean density of population per square mile is 26.25 persons. With Montgomery County fully added in, the same figures are 30,632 and 40.98 – as versus averages of 332,574 and 315 for Mobile and Baldwin Counties. Major differences obviously remain.

Without going line-by-line down a hypothetical spread-sheet of variables, the Alabama Black Belt also differs from Mobile city (\$31,328), Mobile County (\$30,482), and still better-off Baldwin County (\$38,907) in terms of per-capita income. The average of all Black Belt counties against this metric was \$23,954 with Montgomery County left out of the data set and \$24,433 with Montgomery County included: two counties in the region had per capita annual incomes falling under \$20,000 (Perry County at \$16,581, Sumter County at \$19,720).

Urban issues such as crime at scale proved to be another differentiator between the Mobile-centered CSA and most of the Black Belt. While several Black Belt counties “boasted” high overall crime rates on a per capita basis, and some of the figures about to be listed may be due to limited reporting into the FBI’s new UCR/NIBRS system from poor counties,²⁰ homicide totals for 2022 were: 0 for Barbour County, 0 for Bullock County, 0 for Butler County, two for Choctaw County, 0 for Crenshaw County, three for Dallas County, 0 for Greene County, 0 for Hale County, one for Lowndes County, one for Macon County, one for Marengo County, 0 for

²⁰ Data here were obtained by a research associate from <https://cde.ucr.cjis.gov/LATEST/webapp/#/pages/explorer/crime/crime-trend> for county or city. Issues with “NIBRS” reporting have been discussed widely in academic and ‘highbrow’ popular media, and are tackled here by a police journal - <https://policerecordsmanagement.com/the-problem-with-nibrs/>.

Montgomery County,²¹ 0 for Perry County, 0 for Pickens County, 0 for Pike County, 0 for sizable Russell County, one for Sumter County, 0 for Wilcox County, nine for Mobile County, and 37 for Mobile city.

Figure Three: Mobile/Baldwin CSA Counties vs. Black Belt Counties, Various Metrics

Location	Population	Population Density	Per Capita Income	Homicide
Mobile, AL	183,289	1,341	\$31,328	37
Mobile County	411,640	337	\$30,482	9
Baldwin County	253,507	145.8	\$38,907	20
Barbour County, AL	24,706	28.5	\$23,378	0
Bullock County, AL	10,202	16.6	\$22.12	0
Butler County, AL	18,650	24.5	\$26,334	0
Choctaw County, AL	12,439	13.9	\$26,343	2
Crenshaw County, AL	13,025	21.7	\$32,396	0
Dallas County, AL	36,767	39.3	\$22,798	3
Greene County, AL	7,422	11.9	\$20,862	0
Hale County, AL	14,595	23	\$23,690	0
Lowndes County, AL	9,777	14.4	\$23,415	1
Macon County, AL	18,516	32.1	\$22,449	1
Marengo County, AL	18,745	19.8	\$27,210	1
Montgomery County, AL	226,361	291.5	\$32,769	0
Perry County, AL	8,035	11.8	\$16,581	0
Pickens County, AL	18,697	21.7	\$26,912	0
Pike County, AL	33,014	49.1	\$26,685	0
Russell County, AL	58,555	92.3	\$25,855	0
Sumter County, AL	11,853	13.7	\$19,720	1
Wilcox County, AL	10,059	11.9	\$20,442	0
Clarke County, AL	22,515	18.6	\$29,310	0
Conecuh County, AL	11,206	13.6	\$24,426	0
Escambia County, AL	36,666	38.9	\$21,758	0
Lamar County, AL	13,705	23.1	\$24,794	0
Monroe County, AL	19,404	19.3	\$23,090	2
Washington County, AL	15,122	14.2	\$29,210	0

²¹ This is almost certainly due to non-reporting or mistake, to be fair. There were more than ten homicides in Montgomery proper in the same year.

Baldwin County apparently did not report homicide data to the FBI, but there were at least 20 homicides in that county, as well, during the most recent year on record.²² And, homicide rates are obviously one of the best statistical indicators of the overall rate of most-serious crime – it is rather difficult to ignore or disguise a corpse lying in the road.²³ Simply put, running an urban or even suburban county that is part of a significant combined statistical area brings with it different challenges than steering a rural agrarian region forward.

In addition to there being multiple obvious connections between the city of Mobile, Mobile County, and Baldwin County – for example the CSA shared by all three entities, the MSA shared by the first two, patterns of residency and commuting – and more similarities between these three regions than between Mobile and the Alabama Black Belt in terms of population, density and urban structure, it is also the case that many of the connections drawn between Mobile and the Black Belt in the reports of the plaintiffs’ experts logically seem to be extremely tenuous.

For example, Dr. Moorero opines that “the employment needs and interests of Mobile and...the Black Belt residents are closely aligned,” and that Mobile County has traditionally been included in what is presented as a Black Belt-slanted Alabama Workforce Region Seven by the Alabama Department of Labor – a zone which “includes the southwestern counties of Alabama, such as Mobile, Baldwin, Escambia, Monroe, Clarke, Washington, and Conecuh counties.”²⁴ True enough, but only two of the counties in that Workforce Region – Wilcox and

²² <https://gulfcoastmedia.com/stories/homicide-overdose-deaths-rise-in-2023-in-baldwin-county,196139>

²³ <https://link.springer.com/article/10.1007/s43576-023-00086-1>

²⁴ The full Department of Labor State Workforce Regions map can be found here: <https://www2.labor.alabama.gov/Information/WorkforceRegionsMap.pdf>.

Choctaw, which Dr. Moorer for some reason does not mention – are generally considered to be Black Belt counties.

Per an online encyclopedic source,²⁵ which takes nearly its entire list of Black Belt counties from the well-regarded Alabama Black Belt Heritage Area Project,²⁶ counties adjacent to the Black Belt but not part of the core list of 18 provided earlier – like “Clarke, Conecuh, Escambia, Monroe, and Washington” – are rarely included in the region and are more often considered “part of Alabama’s Southern coastal plain.” These counties, along with Mobile County’s true soul-mate of Baldwin County, make up most of AL Workforce Region Seven. By my count, five true Black Belt counties in fact fall in Region Three, seven in Region Five, and four in Region Six. Once again, automatic cross-regional kinship between Mobile or Mobile County and the Belt is here hard to see.

The jobs most prevalent for workers IN Mobile and Mobile County also seem to be very different from those worked in the Black Belt. Dr. Moorer notes very specific connections between the two areas like the shipment of timber from Black-owned farm enterprises – but forestlands in the Black Belt seem to make up just 3-4% of all the Yellowhammer State’s timbering lands.²⁷ More broadly, per the previously discussed Mobile County profile and using unemployment and “Help Wanted” data, the ten most common jobs in metro Mobile currently appear to be: customer service representative, claims adjuster and investigator, cashier, stocker and order filler, truck driver (heavy and tractor trailer), nursing assistant, retail salesperson, laborer and mover, waiter/waitress, and general and operations manager.²⁸

²⁵ [https://en.wikipedia.org/wiki/Black_Belt_\(region_of_Alabama\)](https://en.wikipedia.org/wiki/Black_Belt_(region_of_Alabama))

²⁶ <https://www.alblackbeltheritage.com/>

²⁷ <https://www.scirp.org/reference/referencespapers?referenceid=494246>

²⁸ <https://www2.labor.alabama.gov/workforcedev/CountyProfiles/Mobile%20County.pdf>

As re these positions, overlap was near-total with neighboring Baldwin County, except that the latter unsurprisingly leaned more white-collar: seven of the ten most common jobs (and nine of the top twelve) were identical. The Baldwin out-of-work list ran,²⁹ in order: waiter/waitress, customer service “rep,” general and operations manager, cashier, retail salesperson, claims adjuster, stocker and order filler, sales manager, maids and housekeepers, cooks. In contrast, there was very little overlap between Mobile County jobs and those most typical in the very first Black Belt County selected, Barbour County (population 24,706).³⁰ Just three of the top ten positions held/lost there – helpers and production workers, team assemblers, janitors, customer service reps, production workers (“other”), stockers, packagers and filling machine operators, cashiers, heavy truck drivers, and teaching assistants – over-lapped at all with those in more cosmopolitan Mobile.

²⁹ <https://www2.labor.alabama.gov/workforcedev/CountyProfiles/Baldwin%20County.pdf>

³⁰ <https://www2.labor.alabama.gov/workforcedev/CountyProfiles/Barbour%20County.pdf>

Figure Four: Great Migration Effects on Black Population – Selected Cities

	1910-1940	1940-1970
	Percentage Change in Black Population	Percentage Change in Black Population
Huntsville, AL	-7.4	-24
Mobile, AL	-7.3	-1.5
Montgomery, AL	-6.4	-10.8
Birmingham, AL	1.3	1.3
Chicago, IL	6.2	24.6
Cleveland, OH	8.1	28.7
Detroit, MI	8	34.5
Jackson, MS	-10.6	0.6
Lexington, KY	-5.2	-9.2
New York, NY	4.2	15
Newark, NJ	7.9	43.6
Philadelphia, PA	7.5	20.6
St. Louis, MO	6.9	27.5
Washington, DC	-0.3	42.8
https://www.census.gov/dataviz/visualizations/020/508.php		

Although this is not the focus of this report, even the idea that Mobile has a natural link to the Black Belt region of Alabama because she was populated largely by African American refugees from that region – or, at very least, those fleeing shared abuse historically – seems at least debatable. While some in-state migration obviously took place, a recent project from the U.S. Census looks empirically at the effects of the Great Migration, by tracking changes in the size of the Black population of different American cities between 1910 and 1970. This work finds that Southern cities, likely seen as little better than smaller communities in the same area,

often saw small increases or even decreases in Black population size – as most rural Southern migrants and indeed some few residents of those larger towns moved *North*.³¹

Looking at the hard data, the Black population of Mobile in fact decreased by 1.5 percentage points between 1910 and 1940, and by a remarkable 7.3 points between 1940 and 1970. Similarly, the Black population of Montgomery (AL) shrunk by 10.8 percentage points during the first period and 6.4 points during the second. Huntsville’s Black community declined by an amazing 24 points from ’10 to 1940, and by another 7.4 from 1940-41 until 1970 – as Black Belters and similar migrants almost entirely bypassed the city to strike out North, and more than a few locals followed the same sparkling path to Bigger Thomas’ “promised land.”³² Birmingham did ‘the best’ of any Alabama city, growing her Black population 1.3 points during the first era of analysis and an identical 1.3 points during the second.

The same pattern, in fact, was evident across most of the South during the Great Migration. Jackson, Mississippi, a fairly obvious peer/comparator city for several of the Alabama cities, lost 10.6 percentage points worth of Black population from ’40-70, after growing that community by just .6% during the first wave of Migration. Lexington, Kentucky, near my home, consistently lost Black population – 9.2 percentage points during the first wave of the exodus and 5.2 points during the second. The true “winners” of the Great Migration, in population-gain terms, tended to be almost exclusively large Northern cities perceived as anti-racist: for example, the Black community of Chicago grew (from almost nothing) by 24.6pp. from 1910-40, and by another 6.2 points from then until 1970 – while Detroit’s jumped 34.5 percentage points.

³¹ <https://www.census.gov/dataviz/visualizations/020/508.php>

³² This is obviously a reference to (Brown 1937), the famous *Manchild in the Promised Land* Black male coming of age story.

In context, given that Mobile overall grew from a population of 51,521 in 1910 to a population of 78,720 in 1940, and then to a population of more than 190,000 in the modern era³³ – despite relative and sometimes absolute Black population loss linked TO the Great Migration, and during a period when the South and West were generally the fastest growing regions of the USA –³⁴ it is a bit bizarre to attribute the character of the city primarily to the Alabama Black Belt. Overall, the Black Belt region seems to already have a core city, and to be far less connected to the city of Mobile, across most metrics, than neighboring counties are.

V. Group Gaps, and the “Disparities Equal Discrimination” Myth

Another idea to appear across several of the plaintiffs’ experts’ reports, most notably Dr. Burch’s, is the idea that some unique Alabama-specific vice – presumably that familiar devil, racism – is responsible for a series of group gaps in behavior and performance that we see between Black and white Alabamians. In her report, Dr. Burch notes state-wide gaps in voter turnout and a number of things which correlate with it, including educational attainment and achievement, incarceration, median income, rates of poverty, and unemployment rates.

She attempts to link these, often quite explicitly, to past bias or alleged current bias. For example, following a discussion of NAEP test scoring during which she notes that only 9% of Black Alabama 8th graders are currently proficient in reading, Dr. Burch points out that “Alabama public education remained segregated until the 1960s, even though several years had passed since the decision in *Brown v. Board of Education* in 1954. By 1965, less than 1% of

³³ <https://www.census.gov/population/www/documentation/twps0027/twps0027.html>

³⁴ My latest book discusses some of the reasons for the explosive recent-past growth of the Southern and Western USA (https://www.amazon.com/Lies-My-Liberal-Teacher-Told/dp/0063265974/ref=sr_1_1?crid=4N9X9XDQGDD6&keywords=lies+my+liberal+teacher+told+me&qid=1703200620&srefix=lies+my+libe%2Caps%2C126&sr=8-1), a largely undisputed phenomenon tracked by decade in graphic form by Brookings here: <https://www.brookings.edu/articles/population-growth-in-metro-america-since-1980-putting-the-volatile-2000s-in-perspective/>.

Black Alabama K-12 students were enrolled in integrated schools.” Even today, at least one study claims to find that “lower test scores between Black and White students in Alabama result from a lack of qualified math and science teachers and diminished access to broadband Internet for students in the Black Belt.³⁵” And so on: “segregated proms” are discussed in one lengthy passage, and similar analyses are conducted re several other variables.

There is just one problem with this argument, which I have noted before. The basic patterns which are being attributed to very specific variables in the context of this case – something we often see in the social sciences and the world of consulting – in fact almost certainly have complex cultural and historical causes and *are visible almost everywhere in the country*.

The pattern that Dr. Burch points out re the National Center for Education Statistics’ NAEP test – with all students doing badly (only 30% of *white* kids could read, when I double-checked in Alabama) and Black children doing even worse than their class-mates – is replicated in literally every single state in the USA and does not appear to track with historical racism at all. Per NCES-NAEP’s useful “Annual Report Card,” only 16% of Black students nationally tested as Proficient in 2022, 15% did so in 2019, and 9% did so in the mid-1990s.³⁶ The national Black/white gap in proficiency, 27 points in 2019, is six points larger than the Alabama-specific, reading-specific gap discussed in Dr. Burch’s report.

The awkward reality is that white students perform better educationally than Black students (and worse than East Asian) students in every single state of the USA – i.e., Alabama is in no way an outlier here – and ethnic conflict seems to have very little to do with this. Even

³⁵ <https://ir-api.ua.edu/api/core/bitstreams/f817a3bf-aeca-4c7c-8030-7d20c8dff0c3/content>

³⁶ <https://www.nationsreportcard.gov/reading/nation/achievement/?grade=8>

moving beyond the single NAEP test, the size of contemporary group gaps in SAT scoring and college attendance again correlates only slightly with any sensible measure which might be used to document historical racism.³⁷

Per a nationwide summary of Scholastic Aptitude Test (SAT) scores produced by the U.S. Department of Education after the typical year of 2019, which can be accessed in this report as Figure Five, the mean-average score for whites was 1114, while the averages for bi-racial students, Hispanics, Pacific Islanders, Blacks, and Native Americans were respectively 1095, 978, 964, 933, and 912. Notably, East and South Asians, who experience such significant racism in the United States that we recently saw the launch of a national movement titled Stop Asian Hate,³⁸ outperformed whites by more than 100 points, bringing home average board scores of 1223.

³⁷ An interesting note here is that racial-group SAT and IQ gaps tend to be *smaller* in the Old South, because – for a variety of reasons which this report will engage, including athletic culture and hours of daily study (see Ogbu 2003) white scores in the region are lower. The business-statistics website Zippia currently has the tested Alabama IQ at 95.7 (<https://www.zippia.com/advice/average-iq-by-state/>), and Alabama Caucasians do not score significantly higher than that – last-place Mississippi currently posts just a 94.2.

³⁸ <https://stopaapihate.org/>

Figure Five: SAT Scoring Averages by Race and Section, USA (2019)**SAT Mean Scores of High School Seniors Taking the SAT, by Sex and Race/Ethnicity: 2019**

Sex and Race/Ethnicity	Mean Score (1)		
	Total SAT Score	Evidence-Based Reading and Writing (ERW)	Math
All Students	1059	531	528
Sex			
Male	1066	529	537
Female	1053	534	519
Race/Ethnicity			
White	1114	562	553
Black	933	476	457
Hispanic	978	495	483
Asian	1223	586	637
Pacific Islander	964	487	478
Native American/Alaska Native	912	461	451
Two or More Races	1095	554	540
No Response	959	472	487

(1) Possible scores on each SAT section range from 200 to 800, for a total possible score of 400 to 1600.

SOURCE: U.S. Department of Education, National Center for Education Statistics.
https://nces.ed.gov/programs/digest/d19/tables/dt19_226.10.asp

These score gaps are fairly-to-very consistent across year, region, and the type of school in which learners are enrolled. When I took a look at the same national SAT-means data for the year 2017,³⁹ for my published book *Taboo*,⁴⁰ the large-group averages broke down as: 1181 for

³⁹ “New SAT, Old Gaps on Race” - <https://www.insidehighered.com/news/2017/09/27/scores-new-sat-show-large-gaps-race-and-ethnicity>.

⁴⁰ (Reilly 2020) – available here, with the option to read through the 1st 20 or so pages: https://www.amazon.com/Taboo-Facts-Cant-Talk-About/dp/162157928X/ref=sr_1_2?crid=1HO8YXWV1NHQT&keywords=wilfred+reilly&qid=1700859357&spreix=wilfred+%2Caps%2C135&sr=8-2.

Asian-Americans, 1118 for whites/Caucasians, 987 for Hispanics of all races, 986 for Pacific Islanders, 963 for Native Americans, and 941 for African Americans.

When I evaluated the performances of public vs charter school students in 2021 for the center-right America's Majority Foundation, I obtained a public school average SAT score of 1,109 for all pupils, a charter school average SAT score of 1,021 for all pupils, a public school SAT score of 966 for Black pupils, and a charter school SAT score of 970 for Black pupils. As a direct result, the public school and charter school graduation rates for all pupils were respectively 85% and 78%, while those for Black pupils alone were 78% and 73%.

The same trends continued on into the college admissions process. 63% of all public school pupils (albeit only 53% of all charter school pupils), vs just 54% of Black public schoolers and 55% of Black charter schoolers, proceeded on to do any collegiate study. These data can all be seen in Figure Six. Alabama's 'unique' problem with Black/white gaps is in fact a major and well-known national issue.⁴¹

⁴¹ It seems fair to say that the Black/white test-scoring and collegiate attendance gap, and it's omnipresence across all U.S. states and major municipalities, is one of the best-known American civic issues. In addition to a great deal of serious scholarly work, an online encyclopedia article which prints out to 55 single-spaced sheets of paper tackles the topic (https://en.wikipedia.org/wiki/Racial_achievement_gap_in_the_United_States), and there exist hundred-comment Quora (<https://www.quora.com/Why-is-there-an-achievement-gap-between-black-and-white-students-in-the-U-S>) and Reddit forums devoted to the issue.

Figure Six: Public and Charter School Performance by Six Metrics

School Category	Graduation Rate	Black Graduation Rate	SAT Mean Score	Black SAT Mean Score	College Attendance %	Black College Attendance %
All public schools (State Averages)	85%	78%	1,109	966	63%	54%
All charter schools (State Averages)	78%	73%	1,021	970	53%	55%
Publics: States with Public + Charter data	85%	78%	1,137	964	63%	55%
Charters: States with Public + Charter data	78%	73%	1,020	970	54%	56%

Racial gaps in test scores (and fairly small gaps in high school graduation rates) hardly stand alone as an example of a universal phenomenon frequently attributed to one-variable local causes like “racism” by scholars and attorneys. The same can be said of state-by-state racial gaps in incarceration, something specifically brought up by Dr. Burch and others in the context of Alabama. For a matrix of complex reasons, including more than a dozen other factor variables besides racism, starting with plain crime rate,⁴² Black Americans are over-represented relative to white Americans in every state prison system in the country – as well as within the federal Bureau of Prisons (BOP). Indeed, should we take state-by-state levels of over-representation as a

⁴² According to one of the two most recent Bureau of Justice Statistics National Crime Victimization Survey (BJS-NCVS) reports, Black Americans make up roughly 12% of the national population but commit 25.4% of serious violent crimes – a figure unlikely to be influenced by any police ‘gaming’ of data, as the BJS comes entirely from victim reports made to a Census-style agency: <https://bjs.ojp.gov/document/cv22.pdf>

res ipsa loquitor proxy for oppression, then Alabama is one of the least oppressive places in the country.

This is no exaggeration. Per a well-known 2004 publication from The Sentencing Project, which rests on unchallenged Bureau of Justice Statistics data,⁴³ the per capita ratio of Black incarceration to white incarceration in Alabama – i.e., the ratio representing the number of Black inmates per 100,000 Black state citizens relative to the number of white inmates per 100,000 state citizens – is 4.50. This may, somewhat justifiably, seem high. However, it is in fact the *eighth-lowest ratio on the chart*. The only states to incarcerate fewer African-Americans per capita than Alabama, at least relative to the white population, were the island of Hawaii (1.34), Idaho (2.85), Alaska (4.02), Mississippi (4.12), Georgia (4.14), Nevada (4.29), and Arkansas – with the last of these almost tied with (AL) at a 4.48 B:W ratio.

Figure Seven: Incarceration Rates – By Race, Per 100,000, 2001

STATE	WHITE	BLACK	RATIO
Alabama	417	1,877	4.50
Alaska	464	1,864	4.02
Arizona	544	2,849	5.24
Arkansas	393	1,759	4.48
California	470	2,757	5.87
Colorado	394	2,751	6.98
Connecticut	190	2,427	12.77
Delaware	427	2,799	6.56
Florida	536	2,591	4.83
Georgia	519	2,149	4.14
Hawaii	455	609	1.34
Idaho	551	1,573	2.85
Illinois	251	1,889	7.53
Indiana	391	2,236	5.72
Iowa	284	3,302	11.63
Kansas	345	2,469	7.16
Kentucky	429	2,392	5.58
Louisiana	379	2,251	5.94

⁴³ The Sentencing Project. “State Rates of Incarceration by Race.” Available online here - <https://static.prisonpolicy.org/scans/sp/racialdisparity.pdf>.

Maine	201	926	4.61
Maryland	248	1,686	6.80
Massachusetts	206	1,562	7.58
Michigan	369	2,247	6.09
Minnesota	139	1,755	12.63
Mississippi	399	1,645	4.12
Missouri	430	2,160	5.02
Montana	417	2,118	5.08
Nebraska	229	1,973	8.62
Nevada	646	2,769	4.29
New Hampshire	286	2,649	9.26
New Jersey	161	2,117	13.15
New Mexico	344	2,666	7.75
New York	173	1,638	9.47
North Carolina	265	1,612	6.08
North Dakota	189	1,321	6.99
Ohio	324	2,279	7.03
Oklahoma	644	2,980	4.63
Oregon	458	2,763	6.03
Pennsylvania	244	2,570	10.53
Rhode Island	198	1,672	8.44
South Carolina	349	1,740	4.99
South Dakota	385	2,022	5.25
Tennessee	392	1,991	5.08
Texas	640	3,287	5.14
Utah	372	2,341	6.29
Vermont	218	1,794	8.23
Virginia	361	2,268	6.28
Washington	374	2,141	5.72
West Virginia	294	1,708	5.81
Wisconsin	350	4,058	11.59
Wyoming	443	2,477	5.59
DC	52	1,504	28.92

Data from: <https://static.prisonpolicy.org/scans/sp/racialdisparity.pdf>

Their source: Bureau of Justice Statistics, *Prison and Jail Inmates at Midyear, 2001*, April 2002.

Notably, almost all of the states ‘boasting’ the largest ratios in terms of Black:white incarceration were Northern “blue” or purple states of the kind oft-fond of mocking the Alabamas of the world. Washington, D.C. took pole position with a remarkable ratio of 28.92 to 1, followed by New Jersey (13.15), Connecticut (12.77), Minnesota (12.63), Iowa (11.63),

Wisconsin (11.59), Pennsylvania (10.53), New York (9.47), New Hampshire (9.26), Nebraska (8.62),⁴⁴ Rhode Island (8.44), and Vermont (8.23). In contrast, the bottom/least “oppressive” ten states included Mississippi, Georgia, Arkansas, and Alabama – while Florida came in at 11th (4.83), South Carolina at 12th (4.99), Missouri at 13th (5.02), and Tennessee at 14th (5.08). The average B:W ratio across all U.S. states was 6.63.

Figure Seven: Incarceration Rates – By Race, Per 100,000, Present

STATE	WHITE	BLACK	RATIO
Alabama	421	1,132	2.69
Alaska	417	1,987	4.76
Arizona	428	2,105	4.92
Arkansas	450	1,597	3.55
California	175	1,623	9.27
Colorado	236	1,603	6.79
Connecticut	156	1,512	9.69
Delaware	324	1,654	5.10
Florida	340	1,411	4.15
Georgia	361	1,006	2.79
Hawaii	410	947	2.31
Idaho	502	2,387	4.75
Illinois	156	1,166	7.47
Indiana	320	1,443	4.51
Iowa	225	2,084	9.26
Kansas	265	1,661	6.27
Kentucky	466	1,370	2.94
Louisiana	381	1,411	3.70
Maine	143	1,331	9.31
Maryland	141	746	5.29
Massachusetts	63	466	7.40
Michigan	230	1,479	6.43
Minnesota	105	1,023	9.74
Mississippi	398	1,107	2.78
Missouri	336	1,297	3.86
Montana	371	2,272	6.12
Nebraska	195	1,733	8.89
Nevada	379	1,543	4.07
New Hampshire	269	742	2.76
New Jersey	81	1,009	12.46
New Mexico	216	1,229	5.69

⁴⁴ Admittedly, a bit of an outlier on this list.

New York	96	754	7.85
North Carolina	209	810	3.88
North Dakota	172	848	4.93
Ohio	273	1,530	5.60
Oklahoma	511	2,395	4.69
Oregon	344	1,932	5.62
Pennsylvania	206	1,523	7.39
Rhode Island	131	821	6.27
South Carolina	217	821	3.78
South Dakota	280	1,660	5.93
Tennessee	296	989	3.34
Texas	452	1,547	3.42
Utah	167	1,383	8.28
Vermont	239	1,737	7.27
Virginia	287	1,246	4.34
Washington	222	1,195	5.38
West Virginia	348	1,337	3.84
Wisconsin	230	2,742	11.92
Wyoming	381	1,337	3.51

Data from: <https://www.sentencingproject.org/app/uploads/2022/08/The-Color-of-Justice-Racial-and-Ethnic-Disparity-in-State-Prisons.pdf>

Their source: Carson, E.A. (2021). Prisoners in 2019. Bureau of Justice Statistics; U.S. Census Bureau (n.d.).

At any rate, simply pointing to a B:W disparity in Alabama incarceration rates does not establish the existence of contemporary prejudice or a corrupt system in that specific state: there is no state in which such a disparity could not be found. And, the relatively solid performance of (AL) versus her competitors is almost exactly the same today as it was in the recent past. For this report, I opted to double-check the Project’s 2004 numbers by accessing a 2021 paper (“The Color of Justice: Racial and Ethnic Disparity in State Prisons”) from the same organization.⁴⁵ Little has changed, except that Alabama’s B:W incarceration ratio has actually improved, now standing at 2.69 and ranking as the second lowest ratio observed in the data-set. Virtually the

⁴⁵ Nellis, Ashley. 2021. “The Color of Justice: Racial and Ethnic Disparity in State Prisons.” The Sentencing Project. October release - <https://www.sentencingproject.org/app/uploads/2022/08/The-Color-of-Justice-Racial-and-Ethnic-Disparity-in-State-Prisons.pdf>.

same group of hardly-Dixieland states bring up the national rear and thus presumably “display the most racism:” New Jersey (12.46), Wisconsin (11.92), Minnesota (9.74), Connecticut (9.69), Maine (9.31), California (9.27), Nebraska (8.89), new contender Utah (8.28), and old friend New York (7.85).

Interestingly, racial gaps in voter behavior in Alabama are themselves very small, whether matched up against some external state comparators or any logical definition of what a “large gap” might be. Voter registration in Alabama currently seems to be 89% for non-Hispanic whites, versus 84% for African Americans. In 2020, the equivalent figures were 96.1% (W) and 93.9% (B). In 2018, the registration gap was *less than one percent*, with Blacks at 88% and whites reaching 88.4%.

As Dr. Burch herself points out and Alabama Secretary of State voter data makes clear,⁴⁶ Black Alabamians voted at rates higher than or equal to their white peers in at least six of the <25 counties at issue in this matter: Greene (66% to 55%), Hale (58% to 57%), Mobile (44% to 44%), Perry (66% to 48%!), Russell (37% to 35%), and Sumter (55% to 52%). Overall rates of turnout were 48% for whites (again with Hispanics removed) and 46% for Blacks/African Americans. Remarkably, the very small disparities in voter behavior at issue in Alabama – the smallest recorded gap in turnout, not registration, across the elections analyzed by Dr.s Burch and Liu appears to be ~9 points – persists despite the fact that almost 15% of Black Alabama residents *are duly convicted felons and cannot vote*.⁴⁷

⁴⁶ <https://www.sos.alabama.gov/alabama-votes/voter/election-data>

⁴⁷ Uggen, Christopher, Ryan Larson, Sarah Shannon, and Robert Stewart. 2022. “Locked Out 2022: Estimates of People Denied Voting Rights Due to a Felony Conviction.” Sentencing Project Papers. 25 October - <https://www.sentencingproject.org/reports/locked-out-2022-estimates-of-people-denied-voting-rights/>.

At some point, it becomes remarkably obvious that racism does not singularly, or primarily, explain much of this. There is no logical framework within which “the manner by which white supremacy operates on Asians and Nigerians⁴⁸” explains scholars from those groups destroying white – not ADOS Black – students in the classroom. Looking at any quantitative attempt to map racial prejudice,⁴⁹ it is not a serious claim that California or Utah or Connecticut is simply more conventionally racist than Alabama and thus is more likely per capita to jail Black people.

In reality, many things play into the outcomes we see around us in the world. As re test score gaps, almost literally every scholar to analyze this question empirically from the political center-on-right (e.g. Fordham and Ogbu 1986; McWhorter 2000; Ogbu 2003; Thernstrom and Thernstrom 2003; Sowell 2005; Chua 2011; Reilly 2020; Sowell 2020) has pointed out that American white students tend to study and prep for school more than American Black students – who often see doing this as “acting white⁵⁰” – but less than East Asian and other immigrant students. Standardized test scores follow the same pattern.⁵¹

In the context of crime, the Black “Index” crime rate is predictably and annually about 2.4-2.5x the white crime rate⁵² – a figure which tracks almost exactly with disparities in arrest rates and police shootings.⁵³ It is true that, as Dr. Burch points out, simple racial discrepancy in rates of arrest does not explain all of the racial variance in rates of incarceration. However, this

⁴⁸ <https://www.spiked-online.com/2021/02/25/asians-are-doing-well-lets-re-label-them-as-white/>

⁴⁹ I.e., this one - <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0122963#pone.0122963.ref001>.

⁵⁰ This has been observed for decades, and was likely first stated here - <https://link.springer.com/article/10.1007/BF01112192>. Forty-two years later, major articles discuss the same allegation, within and beyond the context of academic performance: <https://www.sciencedirect.com/science/article/abs/pii/S0027968416301377>.

⁵¹ <https://www.insidehighered.com/news/2017/09/27/scores-new-sat-show-large-gaps-race-and-ethnicity>

⁵² The 2018 (<https://bjs.ojp.gov/content/pub/pdf/cv18.pdf>) and 2022 (<https://bjs.ojp.gov/document/cv22.pdf>) BJS-NCVS are both almost totally typical here.

⁵³ <https://www.washingtonpost.com/graphics/investigations/police-shootings-database/>.

one variable DOES explain about 60% of it. And, further, people of different races are arrested for different crimes, which carry with them different sentences.

Nationally and in Alabama, more than twice as many whites as Blacks commit crimes every year. However, Black Americans generally commit the actual numerical majority of murders – being responsible for 4,078 known suspect/known victim killings in 2019, per the FBI’s famous Homicide Table 43, as versus “just” 3,650 for Caucasians.⁵⁴ Because the sentence handed down for murder is often life or close, murderers make up the largest single bloc of inmates across the USA’s federal and state prisons,⁵⁵ and realities like this largely explain racial disparities in long-term incarceration rates.

Many more variables impact statistical chances. When it comes to propensity to vote, the average age for a Black American – at least at the mode – is 27. The average age for a white American is 58. When we attempt to explain anything from household income differences to the root causes of that B/W crime gap, it might be relevant that the out-of-wedlock birth rate – what a colder and more forthright society called the “illegitimacy rate” – is currently 69% for Black Americans and 17% for Asian Americans.⁵⁶ All in all, life is complicated and odd, and the simple existence of group gaps does not prove racism – just as the simple existence of shared race or political orientation does not demonstrate genuine shared interest.

⁵⁴ <https://ucr.fbi.gov/crime-in-the-u.s/2019/crime-in-the-u.s.-2019/topic-pages/tables/table-43>.

⁵⁵ <https://felonvoting.procon.org/incarcerated-felon-population-by-type-of-crime-committed/> - sourced from: Jennifer Bronson and E. Ann Carson, “Prisoners in 2017,” bjs.ojp.gov, Apr. 2019.

⁵⁶ <https://www.cdc.gov/nchs/data/hus/2017/004.pdf>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Wilfred Reilly (Approved Electronic Signature)

06/28/2024

Wilfred Reilly 06/28/20/24

Appendix A: Curriculum Vitae

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Dissertation

Title: *Measuring Up – The Effect of Minority Status and Other Core Characteristics On Collective Self Esteem: a Quantitative Test of Divergent Theories of Identity Valuation*

Abstract: Many scholars have argued that membership in a minority or “low status” group causes individuals to devalue identities like race, class, gender, and orientation (Hacker 1992; Harris 1993; Tatum 1997; McIntyre 2002). For example, Hacker famously contends that African-Americans devalue Black racial identity while Caucasians value white identity highly, and argues for affirmative action as a partial solution to this problem (Hacker 1995). However, this thesis has never actually been tested using contemporary methodological techniques in the modern American context. I use a large-N List Experiment (Sniderman & Carmines 1997) and ordinal survey techniques to determine whether membership in four minority in-groups (racial minorities, women, LGBT Americans, and members of religious minority groups) correlates significantly

with devaluation of minority in-group identities. Results indicate that minority identity, with the sole and significant exception of bi- or homosexual identification, is not significantly and consistently correlated with identity devaluation.

Books

Reilly, Wilfred. 2023. *NEW Lies Your Teacher Tells You: an Empirical Current Look at History and Its Presentation*.⁵⁷
New York: Harper Collins.

Reilly, Wilfred. 2020. *Taboo: Ten Facts You Can't Talk About*.
Boston: Regnery Publishing.

Reilly, Wilfred. 2019. *Hate Crime Hoax: the Selling of a Fake Race War*.
Boston: Regnery Publishing (SMG).

Reilly, Wilfred. 2016. *The \$50,000,000 Question: An Empirical Examination of the Relationship between Privilege and Pride*. New York: Scholar's Press (Scriptum).

Book Chapters

Reilly, Wilfred. 2022. "The Wages of Immigration: (a) Dissenting Point of View."
In *The Black Boom*, by and ed., Jason Riley.
West Conshohocken, PA: Templeton Press.

Reilly, Wilfred. 2021. "A Positive Vision: the Agenda of 1776."
In *Red, White, and Black*, ed., Robert L. Woodson Sr. New York: Emancipation Press, 3-11.

Reilly, Wilfred. 2021. "Slavery Does Not Define the Black American Experience."
In *Red, White, and Black*, ed., Robert L. Woodson Sr.
New York: Emancipation Press, 37-42.

Reilly, Wilfred. 2021. "Rioting Over a Narrative." In *The Year the World Went Mad*, ed., Tom Slater. London (UK): Spiked Press, 97-102.

Academic Research Publications⁵⁸

Maranto, Robert, Wilfred Reilly, and Patrick Wolf. 2024. "Which Police Departments Make Black Lives Matter?" *Administration and Society*.
0 (0)⁵⁹: <https://journals.sagepub.com/doi/10.1177/00953997241226892>.

⁵⁷ This book is fully accepted by the publisher, but final publication is pending.

⁵⁸ "Think tank" publications are included in this section.

⁵⁹ This is a label representing online-first publication.

- Reilly, Wilfred. 2023. "Imagining Supremacy." *Middle West Review*. Volume 9 (2): 157-163.
- Clark, Corey, Lee Jussim, Komey Frey... Wilfred Reilly et al. 2023. "Pro-Social Motives Underlie Scientific Censorship by Scientists: a Perspective and Research Agenda." *Proceedings of the National Academy of Sciences (PNAS)*. 120 (48): <https://www.pnas.org/doi/10.1073/pnas.2301642120>.
- Maranto, Robert, Wilfred Reilly, Patrick Wolf, and Mattie Harris. 2022. "Which Police Departments Make Black Lives Matter, Which Don't...and Why Don't Most Social Scientists Care?"
Currently Housed: <https://scholarworks.uark.edu/edrepub/136/>.
- Reilly, Wilfred. 2022. "A Path Out: the Potential Effects of Charter Schooling, And Improved Overall Schooling, on African-American Individual and Household Income." *America's Majority Foundation Occasional Publication*: 1-36.
- Reilly, Wilfred. 2021. "Testing the Tests for Racism: What Do Audit Studies Say about Systemic Racism?" *Academic Questions*: 34 (3): 17-27.
- Reilly, Wilfred. 2020. "An Ignored Cost: Effects of Yes/No Lockdown Strategy and Other Variables on April-August Unemployment Across U.S. States." *America's Majority Foundation Occasional Publication*: 1-15.
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⁶⁰ This is an edited list. To save space, primarily-print and primarily online “public intellectual” journals are cited in the same fashion, and hyper-links are not provided.

⁶¹ Online, some print copies.

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⁶² This essay also appeared on the 1776 Unites website (1776unites.com), and when expanded will constitute a chapter in an upcoming 2021 release from Bombardier Books.

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Steinmetz, Peter, and Wilfred Reilly. "State Behavior or Personal Choice (?): an Empirical Analysis of the Effects of COVID-19 Lockdowns with Google Mobility Data Taken Into Account." To be submitted to *The Journal of the American Medical Association*.⁶⁴

Reilly, Wilfred. "One Privilege, or Many Privileges? Testing the Effect of Whiteness and Other Social Variables on a 100-Point Metric." To be submitted to *The Journal of Behavioral and Social Sciences*.⁶⁵

Reilly, Will. "Winning at the First Stage: An Empirical Examination of Defendant Success in Five Midwestern Trial Courts." To be submitted to *Law and Society Review*.

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Reilly, Will. "Upper-Class Kids; Lower-Class Jobs: Using a Set of Quantifiable Economic Variables to Predict Identification with the 'Hipster' and Post-Occupy Movements." Currently being written and edited.

Reilly, Will. "Word on the Street: The Effect of Race, Gender, Political Identification, and Other Factors on the Performance of Paid Canvassers." Currently being written and edited.

Conference Presentations and Other Presented Work

"Predictors of Plague: a Quantitative Analysis of Determinants of National Success vs. COVID-19." Paper presented at Kentucky Political Science Association Conference. Owensboro, KY (March 2024).

⁶³ For website and print publication release, as I understand.

⁶⁴ And, after rejection there, who knows?!

⁶⁵ Official data gathering for this project has not yet begun, however all introductory portions of the article (i.e. Literature) have been written and the methodological model designed.

“Charter Cities Ideology: An Alternative Narrative to Africa’s Migration Conundrum.” Paper co-presented at Kentucky Political Science Association Conference. Owensboro, KY (March 2024).

“The De-Transition Time Bomb: an Empirical Analysis.” Paper presented at Genspect: the Bigger Picture Annual Conference. Denver, CO (December 2023).

“Black Conservatism – the Past, Present, and Future.” Paper/data presented at University of Wisconsin-Madison Free Speech Week. Madison, WI (October 2023).

“Foundation against Intolerance and Racism Speaks: Data as the Corrective to Irrational Fear.” Paper presented/long-form speech given at Pancakes for Providence elite prep school event. Plymouth, MN (February 2023).

“The Numbers Keep Changing: How Information Manipulation Contributes to the Culture of Fear.” Paper presented at Politics, Policy and Panic: Governing In Times of Crisis Conference. Latrobe, PA (April 2022).

“Why the Narrative Always Collapses.” Paper presented/long-form speech given at bi-partisan Center for the American Experiment Annual Meeting. Minneapolis, MN (February 2022).

“Data, Hard Facts, and the Business of Leadership.” Presentation/Requested Speech given at Key-Note Session: Leadership Program of the Rockies. Denver, CO (July 2020).

“Diversity, Security, and Conflict: a Specifically African Analysis.” Paper Accepted for presentation at Midwest Political Science Association Conference. Chicago, IL (April 2020).⁶⁶

“Boundaries of Terrorism: Who Is a Terror Fighter, and Who Is Not?” Presentation/Requested Speech given at KYSU Bluegrass Intelligence Consortium Event. Frankfort, KY (March 2018).

“Can Diverse States Be Secure? The Effect of Tribal and Racial Diversity on Homicide Rate, Civil Conflict, and Chances of International War-Fighting.” Paper presented at Midwest Political Science Association Conference. Chicago, IL (April 2017).

⁶⁶ I list an “accepted” paper here because the conference was canceled – like virtually all big-city events during April of 2020.

“An App for the Culture of Fear? An Empirical Examination of the Effect of Social Media Content on Racial and Political Distrust.” Paper presented at Midwest Political Science Association Conference. Chicago, IL (April 2016). Paper accepted for presentation at American Association of Behavioral and Social Sciences Conference. Las Vegas, NV (February 2016).

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“Fare Ball: An Analysis of Why Some University Athletic Departments Make Money (While Others Do Not).” Paper presented at Midwest Political Science Association Conference. Chicago, IL (April 2010).

“Predictors of Criminal Court Victory: A Five County Analysis of Defendant Success Rates.” Paper presented at Midwest Political Science Association Conference. Chicago, IL (April 2009).

“Altered Perceptions: A Quantitative Test of Whether the American Beauty Standard Is Changing to reflect Increased National Diversity.” Paper presented at Midwest Political Science Association Conference. Chicago, IL (April 2009).

“The Coefficients of Victory: Variables Predicting Trial Wins among Criminal Defendants.” Paper presented at Midwest Political Science Association Conference. Chicago, IL (April 2008).

“Variance in Court: An Analysis of Courtroom Success among Distinct Groups of Criminal Defendants.” Poster presented at Department of Political Science Graduate Student Exposition. Carbondale, IL (December 2007).

“The Coefficients of Victory: Variables Predicting Trial Wins among Criminal Defendants.” Paper presented at DFI All Fellows Conference. Chicago, IL (November 2007).

“Ball Fair? Using the NCAA Tournament to Test the Actual Frequency of Fair Play Games.” Paper presented at DFI All Fellows Conference. Chicago, IL (November 2007).

“Justice or Just-Us: A Quantitative Examination of Prosecutorial Victory Rates Across Groups.” Paper presented at Black Graduate Students Association Conference. Evanston, IL (April 2007).

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<https://podcasts.apple.com/gb/podcast/4-rejecting-racial-nationalism-with-wilfred-reilly/id1527944755?i=1000495402455>.

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Reilly, Wilfred. Debater/Panel Participant. "Systemic Racism and the Data:

Wilfred Reilly and Roderick Graham with John Wood, Jr."

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The Unregistered University Podcast. 13 July 2020.

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<https://www.youtube.com/watch?v=MIGyfaQ7qY8>.

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National and Major Regional Television Appearances

Reilly, Wilfred. 2022. Interview/Panel w Greg Gutfeld. *Gutfeld*. Fox News Channel. 27 October.

https://archive.org/details/FOXNEWSW_20221028_030000_Gutfeld.

Reilly, Wilfred. 2020. Interview by Paul Rudy. *Good Morning San Diego*. KUSI TV California. 28 August.
<https://www.youtube.com/watch?v=WZ3Ps8LMweo>.

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<https://video.foxnews.com/v/6163734686001#sp=show-clips>.

Reilly, Wilfred. 2020. Interview by Tucker Carlson. *Tucker Carlson Tonight*. Fox News Channel. 6 June.
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Reilly, Wilfred. 2020. Interview by Laura Ingraham. *The Ingraham Angle*. Fox News Channel. 5 June.
<https://www.msn.com/en-us/health/fitness/push-to-dismantle-us-police-based-on-lies-and-false-data/vi-BB156cEB>.

Reilly, Wilfred. 2019. Interview by Sky News Team. *The Outsiders Program*. Sky News Australia. 14 July.
<https://twitter.com/skynewsaustr/status/1150235309105270785?lang=en>.

Reilly, Wilfred. 2019. Interview by Tucker Carlson. *Tucker Carlson Tonight*. Fox News Channel. 20 February.
<https://video.foxnews.com/v/6004289765001#sp=show-clips>.

Teaching Experience⁶⁸

⁶⁷ I shared this interview with Raz Simone, alleged “warlord” of CHAZ in Seattle. We weren’t on at the exact same time, but apparently fielded similar questions.

⁶⁸ As a note: from late 2009 through 2014, I worked primarily in non-academic positions focused on affecting real-world political discourse, with the Fund for the Public Interest/Human Rights Campaign and M. Evans Global, before returning to the classroom as my PhD completion date approached. References from these positions are excellent and available.

Political Science, Kentucky State University (Fall 2018-Present)
Associate Professor
Political Science, Kentucky State University (Fall 2015-Fall 2018)
Assistant Professor
Political Science, City Colleges of Chicago (2013)
Adjunct Professor
Activist Instruction, Fund for the Public Interest (2009-2012)
Community Organizer
United States Government, Aurora University (Spring 2009)
Adjunct Professor
Law and Society, Southern Illinois University (Fall 2008)
Instructor
Criminal Justice/Court Management, Southern Illinois University (Spring 2008)
Instructor
Law and Society, Southern Illinois University (Fall 2007)
Instructor
Civil Rights and Liberties, Southern Illinois University (Spring 2007)
Teaching Assistant
Civil Rights and Liberties, Southern Illinois University (Fall 2006)
Teaching Assistant
Law and Society, Southern Illinois University (Fall 2006)
Teaching Assistant

Job Relevant Curriculum

University of Illinois

- ◆ Law 609: Legal Writing and Research
- ◆ Law 656: International Law and Governance
- ◆ Law 657: International Human Rights
- ◆ Law 689: Law and Economics
- ◆ Law 697: Competitive Moot Court

Southern Illinois University

- ◆ POLS 500A-C: Quantitative Methods in Research
- ◆ POLS 504: Pro-Seminar in Classical Theory
- ◆ POLS 505: Pro-Seminar in Post-Modern Theory
- ◆ POLS 538: Pro-Seminar in Public Law
- ◆ POLS 575: Pro-Seminar in International Relations

Kentucky State University

- ◆ POS 101: American Government
- ◆ POS 211: Introduction to Political Science
- ◆ POS 301: Research Methodology
- ◆ POS 431: Constitutional Law
- ◆ POS 499: Senior Capstone/Writing & Research
- ◆ PSY 522: Law and Social Science

Service to the Campus Community

Member: Kentucky State Coronavirus Task Force, Fall 2020-Fall 2021
Faculty Ombudsman: Kentucky State University, Spring 2018-Fall 2021
Parliamentarian: KYSU Faculty Senate, Fall 2017-Fall 2019
Chair (Professional Concerns Committee): Faculty Senate, Fall 2017-Fall 2019
Member: KYSU International Studies Committee, Fall 2016-Present
Advisor: KYSU LGBT Center, Fall 2015-Spring 2018
Sitting Member: KYSU All-University Court, Fall 2015-Present⁶⁹

Honors and Awards

Finalist: Woodrow Wilson National Fellowship (2017)
Top Paper Award, Northwestern B.G.S.A. Conference (2007)
Diversifying the Faculty of Illinois (D.F.I.) Fellowship Recipient (2005-Present)
John Marshall (C.L.E.O.) Legal Fellowship Recipient (2002-2005)
Illinois Lincoln Scholar, Southern Illinois University (2002)

Professional Associations

American Political Science Association, 2019-Present
Midwest Political Science Association, 2007-Present
American Bar Association, 2004-2012
American Association of Trial Lawyers, 2004-2008

⁶⁹ So far as I know, re this one. Some of these dates may be approximate.

Appendix B – More Tables: Diverse Group Gaps Across Multiple States, from Research

		AL	CA	MI	MN	NJ	NY	WA
White alone	Total Population	3,229,609	14,896,256	7,293,902	4,330,763	4,920,179	10,604,385	5,045,523
	Below Poverty	374,176	1,461,810	784,809	317,577	329,814	1,083,094	438,750
	Percentage Below Poverty	11.6	9.8	10.8	7.3	6.7	10.2	8.7
Black alone	Total Population	1,243,592	2,033,498	1,278,921	386,438	1,132,709	2,730,828	298,945
	Below Poverty	332,711	391,403	346,648	95,573	184,569	609,101	50,744
	Percentage Below Poverty	26.8	19.2	27.1	24.7	16.3	22.3	17
American Indian/Native American alone	Total Population	23,864	494,381	43,903	50,898	43,157	121,142	95,563
	Below Poverty	4,331	76,130	9,663	15,316	7,134	25,292	16,077
	Percentage Below Poverty	18.1	15.4	22	30.1	16.5	20.9	16.8
Asian alone	Total Population	75,575	5,955,412	328,543	288,343	922,728	1,738,256	751,665
	Below Poverty	7,394	586,299	32,202	34,044	57,117	245,252	58,300
	Percentage Below Poverty	9.8	9.8	9.8	11.8	6.2	14.1	7.8
Native Hawaiian & Other Pacific Islander alone	Total Population	NA	156,558	NA	NA	NA	7,652	53,393
	Below Poverty	NA	20,577	NA	NA	NA	2,133	9,019
	Percentage Below Poverty	NA	13.1	NA	NA	NA	27.9	16.9
Some other race alone	Total Population	100,371	7,467,785	183,131	165,783	968,132	2,035,773	444,280
	Below Poverty	27,144	1,210,896	31,105	29,546	168,152	442,258	79,887
	Percentage Below Poverty	27	16.2	17	17.8	17.4	21.7	18
Two or more races	Total Population	252,186	7,303,828	697,664	375,085	1,114,494	1,947,053	962,602
	Below Poverty	52,925	923,209	110,993	47,838	134,977	327,689	110,692
	Percentage Below Poverty	21	12.6	15.9	12.8	12.1	16.8	11.5
Hispanic or Latino origin (of any race)	Total Population	238,512	15,468,911	558,250	327,079	2,000,038	3,784,698	1,070,519
	Below Poverty	65,787	2,300,778	101,908	54,862	307,968	788,943	158,876
	Percentage Below Poverty	27.6	14.9	18.3	16.8	15.4	20.8	14.8
White alone, not Hispanic or Latino	Total Population	3,180,344	12,927,328	7,165,227	4,273,862	4,685,603	10,160,602	4,864,419
	Below Poverty	360,294	1,183,941	756,468	309,255	301,937	996,627	415,896
	Percentage Below Poverty	11.3	9.2	10.6	7.2	6.4	9.8	8.5

		AL	CA	MI	MN	NJ	NY	WA
White alone	Total Population	1,348,083	6,425,859	3,170,077	1,921,272	2,096,860	4,718,882	2,235,768
	Percent Distribution	66.9	47.4	77.5	82.7	59.6	60.7	72.6
	Median Income (Dollars)	68,168	100,917	71,609	85,697	105,428	89,408	91,916
Black alone	Total Population	529,221	814,524	520,437	133,989	439,953	1,071,357	110,968
	Percent Distribution	26.2	6	12.7	5.8	12.5	13.8	3.6
	Median Income (Dollars)	40,774	63,268	42,056	51,320	65,850	57,898	68,202
American Indian/Native American alone	Total Population	7,826	157,658	16,920	17,598	14,252	41,365	30,164
	Percent Distribution	0.4	1.2	0.4	0.8	0.4	0.5	1
	Median Income (Dollars)	62,000	76,752	54,651	45,227	74,433	63,208	71,255
Asian alone	Total Population	27,422	2,064,774	116,531	92,892	325,863	614,981	284,950
	Percent Distribution	1.4	15.2	2.8	4	9.3	7.9	9.3
	Median Income (Dollars)	83,281	119,861	101,652	93,773	144,878	89,947	125,692
Native Hawaiian & Other Pacific Islander alone	Total Population	NA	46,769	NA	NA	NA	NA	16,973
	Percent Distribution	NA	0.3	NA	NA	NA	NA	0.6
	Median Income (Dollars)	NA	95,670	NA	NA	NA	NA	81,623
Some other race alone	Total Population	26,597	2,010,558	59,665	48,983	296,000	672,681	123,569
	Percent Distribution	1.3	14.8	1.5	2.1	8.4	8.7	4
	Median Income (Dollars)	49,889	71,383	61,183	65,473	67,237	56,210	69,545
Two or more races	Total Population	76,071	2,030,444	205,529	106,425	343,094	652,151	277,561
	Percent Distribution	3.8	15	5	4.6	9.8	8.4	9
	Median Income (Dollars)	62,694	83,153	63,251	74,586	84,272	73,557	84,303
Hispanic or Latino origin (of any race)	Total Population	64,508	4,220,481	168,471	96,376	633,191	1,278,925	293,836
	Percent Distribution	3.2	31.1	4.1	4.2	18	16.5	9.5
	Median Income (Dollars)	54,891	75,698	62,497	63,399	72,170	60,468	74,770
White alone, not Hispanic or Latino	Total Population	1,333,728	5,840,157	3,124,790	1,901,531	2,016,031	4,550,566	2,179,808
	Percent Distribution	66.1	43.1	76.4	81.9	57.3	58.5	70.8
	Median Income (Dollars)	68,212	103,065	71,829	85,844	106,209	90,104	92,277

		AL	CA	MI	MN	NJ	NY	WA
White alone								
Population	Total	2,362,687	11,402,797	5,372,861	3,202,951	3,704,829	8,005,145	3,813,713
Population	Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Male	1,143,616	5,676,097	2,648,509	1,590,349	1,801,051	3,901,984	1,912,446
Population	Male Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Female	1,219,071	5,726,700	2,724,352	1,612,602	1,903,778	4,103,161	1,919,267
Population	Female Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
High school graduate or higher	Total	2,137,696	10,710,883	5,021,447	3,095,368	3,528,940	7,520,693	3,650,370
High school graduate or higher	Percent	90.5	93.9	93.5	96.6	95.3	93.9	95.3
High school graduate or higher	Male	1,020,398	5,308,597	2,459,760	1,527,305	1,710,888	3,642,649	1,809,252
High school graduate or higher	Male Percent	89.2	93.5	92.9	96	95	93.4	94.6
High school graduate or higher	Female	1,117,298	5,402,286	2,561,687	1,568,063	1,818,052	3,878,044	1,841,118
High school graduate or higher	Female Percent	91.7	94.3	94	97.2	95.5	94.5	95.9
Bachelor's degree or higher	Total	746,519	5,180,337	1,798,748	1,300,134	1,776,468	3,699,093	1,547,697
Bachelor's degree or higher	Percent	31.6	45.4	33.5	40.6	48	46.2	40.4
Bachelor's degree or higher	Male	358,126	2,579,210	865,686	612,635	861,763	1,748,215	761,436
Bachelor's degree or higher	Male Percent	31.3	45.4	32.7	38.5	47.8	44.8	39.8
Bachelor's degree or higher	Female	388,393	2,601,127	933,062	687,499	914,705	1,950,878	786,261
Bachelor's degree or higher	Female Percent	31.9	45.4	34.2	42.6	48	47.5	41
Black alone								
Population	Total	858,405	1,486,377	863,795	220,608	793,807	19,539,156	207,097
Population	Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Male	382,782	740,315	398,035	113,243	364,395	890,694	118,467
Population	Male Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Female	475,623	746,062	465,760	107,365	429,412	1,063,221	88,630
Population	Female Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
High school graduate or higher	Total	745,172	1,352,400	754,824	183,029	716,043	1,658,912	183,527
High school graduate or higher	Percent	86.8	91	87.4	83	90.2	84.9	88.6
High school graduate or higher	Male	323,090	666,493	340,116	98,581	328,648	744,472	104,879
High school graduate or higher	Male Percent	84.4	90	85.4	87.1	90.2	83.6	88.5
High school graduate or higher	Female	422,082	685,907	414,708	84,448	387,395	914,440	78,648
High school graduate or higher	Female Percent	88.7	91.9	89	78.7	90.2	86	88.7
Bachelor's degree or higher	Total	179,862	449,911	161,307	58,151	229,642	535,540	57,122
Bachelor's degree or higher	Percent	21	30.3	18.7	26.4	28.9	27.4	27.6
Bachelor's degree or higher	Male	63,147	203,734	60,460	31,831	93,869	212,080	31,749
Bachelor's degree or higher	Male Percent	16.5	27.5	15.2	28.1	25.8	23.8	26.8
Bachelor's degree or higher	Female	116,715	246,177	100,847	26,320	135,773	323,460	25,373
Bachelor's degree or higher	Female Percent	24.5	33	21.7	24.5	31.6	30.4	28.6
American Indian/Native American alone								
Population	Total	15,599	335,623	31,622	31,867	29,170	81,470	61,648
Population	Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Male	7,222	172,577	15,658	16,520	15,245	42,266	30,516
Population	Male Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Female	8,377	163,046	15,964	15,347	13,925	39,204	31,132
Population	Female Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)

High school graduate or higher	Total	11,678	245,437	25,357	25,758	19,849	57,706	50,815
High school graduate or higher	Percent	74.9	73.1	80.2	80.8	68	70.8	82.4
High school graduate or higher	Male	5,564	125,153	11,770	13,758	10,084	27,961	24,782
High school graduate or higher	Male Percent	77	72.5	75.2	83.3	66.1	66.2	81.2
High school graduate or higher	Female	6,114	120,284	13,587	12,000	9,765	29,745	26,033
High school graduate or higher	Female Percent	73	73.8	85.1	78.2	70.1	75.9	83.6
Bachelor's degree or higher	Total	3,018	60,350	4,144	4,494	6,444	16,952	9,918
Bachelor's degree or higher	Percent	19.3	18	13.1	14.1	22.1	20.8	16.1
Bachelor's degree or higher	Male	1,165	26,628	1,266	2,041	3,031	7,579	3,958
Bachelor's degree or higher	Male Percent	16.1	15.4	8.1	12.4	19.9	17.9	13
Bachelor's degree or higher	Female	1,853	33,722	2,878	2,453	3,413	9,373	5,960
Bachelor's degree or higher	Female Percent	22.1	20.7	18	16	24.5	23.9	19.1
Asian alone								
Population	Total	55,304	4,492,618	229,618	188,143	668,162	1,288,318	566,954
Population	Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Male	23,720	2,095,241	111,246	91,548	325,039	604,196	262,328
Population	Male Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Female	31,584	2,397,377	118,372	96,595	343,123	684,122	304,626
Population	Female Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
High school graduate or higher	Total	48,383	3,998,178	205,452	153,814	617,177	1,033,899	513,845
High school graduate or higher	Percent	87.5	89	89.5	81.8	92.4	80.3	90.6
High school graduate or higher	Male	20,736	1,895,950	102,023	77,825	303,022	491,963	243,597
High school graduate or higher	Male Percent	87.4	90.5	91.7	85	93.2	81.4	92.9
High school graduate or higher	Female	27,647	2,102,228	103,429	75,989	314,155	541,936	270,248
High school graduate or higher	Female Percent	87.5	87.7	87.4	78.7	91.6	79.2	88.7
Bachelor's degree or higher	Total	29,403	2,526,242	146,363	87,052	482,162	627,831	338,081
Bachelor's degree or higher	Percent	53.2	56.2	63.7	46.3	72.2	48.7	59.6
Bachelor's degree or higher	Male	13,835	1,195,699	76,555	42,119	241,059	297,292	164,370
Bachelor's degree or higher	Male Percent	58.3	57.1	68.8	46	74.2	49.2	62.7
Bachelor's degree or higher	Female	15,568	1,330,543	69,808	44,933	241,103	330,539	173,711
Bachelor's degree or higher	Female Percent	49.3	55.5	59	46.5	70.3	48.3	57
Native Hawaiian & Other Pacific Islander alone								
Population	Total	NA	109,670	NA	2,170	NA	4,578	57
Population	Percent	NA	(X)	NA	(X)	NA	(X)	(X)
Population	Male	NA	54,588	NA	1,384	NA	2,652	16,800
Population	Male Percent	NA	(X)	NA	(X)	NA	(X)	(X)
Population	Female	NA	55,082	NA	786	NA	1,926	18,617
Population	Female Percent	NA	(X)	NA	(X)	NA	(X)	(X)
High school graduate or higher	Total	NA	96,600	NA	1,989	NA	3,870	30,786
High school graduate or higher	Percent	NA	88.1	NA	91.7	NA	84.5	86.9
High school graduate or higher	Male	NA	48,404	NA	1,350	NA	2,056	14,753
High school graduate or higher	Male Percent	NA	88.7	NA	97.5	NA	77.5	87.8
High school graduate or higher	Female	NA	48,196	NA	639	NA	1,814	16,033
High school graduate or higher	Female Percent	NA	87.5	NA	81.3	NA	94.2	86.1
Bachelor's degree or higher	Total	NA	25,885	NA	294	NA	1,317	4,776
Bachelor's degree or higher	Percent	NA	23.6	NA	13.5	NA	28.8	13.5

Bachelor's degree or higher	Male	NA	12,467	NA	47	NA	561	3,341
Bachelor's degree or higher	Male Percent	NA	22.8	NA	3.4	NA	21.2	19.9
Bachelor's degree or higher	Female	NA	13,418	NA	247	NA	756	1,435
Bachelor's degree or higher	Female Percent	NA	24.4	NA	31.4	NA	39.3	7.7
Some other race alone								
Population	Total	51,099	4,735,909	113,722	92,962	608,360	1,348,607	255,114
Population	Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Male	28,396	2,411,740	60,128	49,854	307,032	659,567	135,209
Population	Male Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Female	22,703	2,324,169	53,594	43,108	301,328	689,040	119,905
Population	Female Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
High school graduate or higher	Total	33,966	3,056,617	84,788	64,335	428,733	938,349	163,474
High school graduate or higher	Percent	66.5	64.5	74.6	69.2	70.5	69.6	64.1
High school graduate or higher	Male	18,018	1,525,530	44,740	33,921	209,835	446,966	84,180
High school graduate or higher	Male Percent	63.5	63.3	74.4	68	68.3	67.8	62.3
High school graduate or higher	Female	15,948	1,531,087	40,048	30,414	218,898	491,383	79,294
High school graduate or higher	Female Percent	70.2	65.9	74.7	70.6	72.6	71.3	66.1
Bachelor's degree or higher	Total	8,108	612,213	26,953	18,060	112,337	253,987	41,207
Bachelor's degree or higher	Percent	15.9	12.9	23.7	19.4	18.5	18.8	16.2
Bachelor's degree or higher	Male	3,655	275,384	14,294	8,932	50,960	108,833	20,983
Bachelor's degree or higher	Male Percent	12.9	11.4	23.8	17.9	16.6	16.5	15.5
Bachelor's degree or higher	Female	4,453	336,829	12,659	9,128	61,377	145,154	20,224
Bachelor's degree or higher	Female Percent	19.6	14.5	23.6	21.2	20.4	21.1	16.9
Two or more races								
Population	Total	129,510	4,303,779	365,585	179,864	676,276	1,210,208	512,266
Population	Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Male	61,936	2,152,213	179,924	87,102	331,015	580,156	258,612
Population	Male Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Female	67,574	2,151,566	185,661	92,762	345,261	630,052	253,654
Population	Female Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
High school graduate or higher	Total	107,384	3,290,975	315,656	160,391	568,458	997,599	448,897
High school graduate or higher	Percent	82.9	76.5	86.3	89.2	84.1	82.4	87.6
High school graduate or higher	Male	50,444	1,624,295	153,663	77,464	275,686	475,340	221,422
High school graduate or higher	Male Percent	81.4	75.5	85.4	88.9	83.3	81.9	85.6
High school graduate or higher	Female	56,940	1,666,680	161,993	82,927	292,772	522,259	227,475
High school graduate or higher	Female Percent	84.3	77.5	87.3	89.4	84.4	92.9	89.7
Bachelor's degree or higher	Total	33,444	1,081,003	103,591	65,526	214,042	421,841	160,882
Bachelor's degree or higher	Percent	25.8	25.1	28.3	36.4	31.7	34.9	31.4
Bachelor's degree or higher	Male	16,101	506,772	45,792	28,172	97,622	186,803	74,070
Bachelor's degree or higher	Male Percent	26	23.5	25.5	32.3	29.5	32.2	28.6
Bachelor's degree or higher	Female	17,343	574,231	57,799	37,354	116,420	235,038	86,812
Bachelor's degree or higher	Female Percent	25.7	26.7	31.1	40.3	33.7	37.3	34.2
Hispanic or Latino origin (of any race)								
Population	Total	119,827	9,476,755	308,705	171,826	1,247,833	2,459,638	572,985
Population	Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Male	60,757	4,765,324	158,492	89,338	622,272	1,197,570	298,954

Population	Male Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Female	59,070	4,711,431	150,213	82,488	625,561	1,262,068	274,031
Population	Female Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
High school graduate or higher	Total	82,613	6,517,423	238,816	125,873	945,030	1,800,287	412,642
High school graduate or higher	Percent	68.9	68.8	77.4	73.3	75.7	73.2	72
High school graduate or higher	Male	40,456	3,212,204	120,757	63,485	460,751	858,809	207,592
High school graduate or higher	Male Percent	66.6	67.4	76.2	71.1	74	71.7	69.4
High school graduate or higher	Female	42,157	3,305,219	118,059	62,388	484,279	941,478	205,050
High school graduate or higher	Female Percent	71.4	70.2	78.6	75.6	77.4	74.6	74.8
Bachelor's degree or higher	Total	22,829	1,562,020	72,376	39,836	288,241	574,606	113,154
Bachelor's degree or higher	Percent	19.1	16.5	23.4	23.2	23.1	23.4	19.7
Bachelor's degree or higher	Male	11,146	700,030	34,107	18,442	128,765	246,448	54,545
Bachelor's degree or higher	Male Percent	18.3	14.7	21.5	20.6	20.7	20.6	18.2
Bachelor's degree or higher	Female	11,683	861,990	38,269	21,394	159,476	328,158	58,609
Bachelor's degree or higher	Female Percent	19.8	18.3	25.5	25.9	25.5	26	21.4
White alone, not Hispanic or Latino								
Population	Total	2,337,965	10,260,717	5,307,355	3,175,365	3,566,363	7,730,437	3,738,215
Population	Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Male	1,131,744	5,129,230	2,616,925	1,576,513	1,734,071	3,770,108	1,865,723
Population	Male Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
Population	Female	1,206,221	5,131,487	2,690,430	1,598,852	1,832,292	3,960,329	1,872,492
Population	Female Percent	(X)	(X)	(X)	(X)	(X)	(X)	(X)
High school graduate or higher	Total	2,118,843	9,809,588	4,966,652	3,073,157	3,411,190	7,294,881	3,573,047
High school graduate or higher	Percent	90.6	95.6	93.6	96.8	95.6	94.4	95.6
High school graduate or higher	Male	1,011,376	4,887,099	2,433,796	1,516,585	1,655,412	3,535,421	1,771,606
High school graduate or higher	Male Percent	89.4	95.3	93	96.2	95.5	93.8	95
High school graduate or higher	Female	1,107,467	4,922,489	2,532,856	1,556,572	1,755,778	3,759,460	1,801,441
High school graduate or higher	Female Percent	91.8	95.9	94.1	97.4	95.8	94.9	96.2
Bachelor's degree or higher	Total	740,940	4,915,611	1,782,286	1,291,584	1,731,196	3,610,304	1,524,116
Bachelor's degree or higher	Percent	31.7	47.9	33.6	40.7	48.5	46.7	40.8
Bachelor's degree or higher	Male	355,147	2,464,970	858,278	609,125	840,925	1,708,254	750,020
Bachelor's degree or higher	Male Percent	31.4	48.1	32.8	38.6	48.5	45.3	40.2
Bachelor's degree or higher	Female	385,793	2,450,641	924,008	682,459	890,271	1,902,050	774,096
Bachelor's degree or higher	Female Percent	32	47.8	34.3	42.7	48.6	48	41.3