

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

DAVID TANGIPA, *et al.*,

Plaintiffs,

v.

GAVIN NEWSOM, in his official capacity as the Governor of California; SHIRLEY WEBER, in her official capacity as California Secretary of State, et al.,

Defendants.

2:25-cv-10616-JLS-WLH-KKL
Three-Judge Court

EXPERT REPORT OF SEAN P. TRENDE, Ph.D

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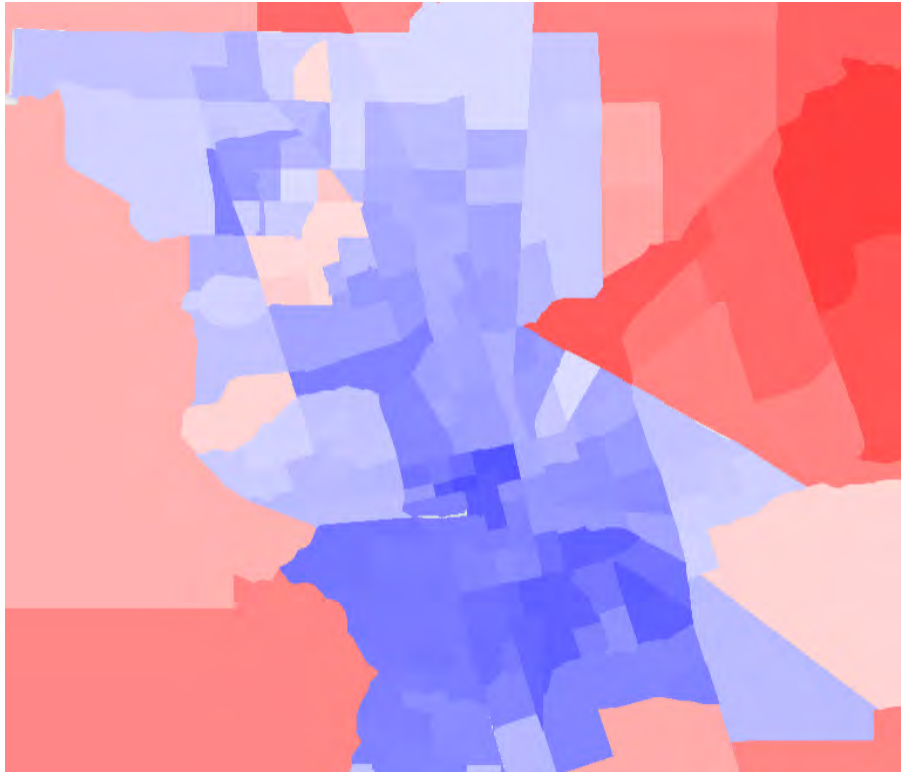
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My name is Sean Trende and I am at least 18 years of age. I have been asked to respond to points made, where appropriate in the Declaration of Dr. Bernard Grofman Supporting Defendants’ Opposition to Plaintiffs’ and Plaintiff-Intervenors’ Motions for Preliminary Injunction, dated December 3, 2025 (“Grofman Report”), Expert Report of Dr. Jonathan Rodden in Support of DCCC’s Response in Opposition to Plaintiffs’ and the United States’ Motions for a Preliminary Injunction, dated December 3, 2025 (“Rodden Report”), and the Response Report of Anthony E. Fairfax On The 2025 California Congressional District Plan, dated December 3, 2025 (“Fairfax Report”). Collectively, I’ll refer to these reports as the “Opposing Reports,” and the collective authors as the “Opposing Experts.” I will also refer to the map in effect for the 2022 and 2024 elections the “Commission Map,” while I will refer to the map passed in the referendum as the “Assembly Map.” For the reasons below, nothing in these reports causes me to reassess my conclusion.

1 Introduction

Suppose that someone were to show you the following map of election results, and tell you that you are to draw a political gerrymander, entering the area from the south, and ask what areas you would most heavily prioritize for inclusion:

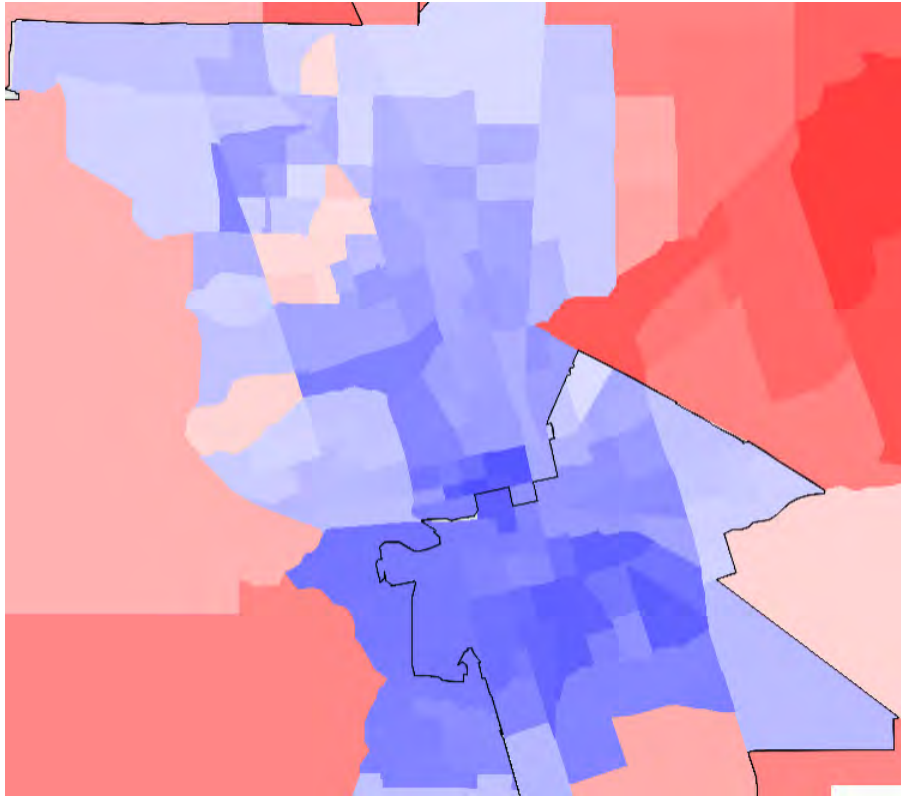
Figure 1: Stockton Area Block Groups, by 2024 Presidential Election Result



Perhaps reasonable minds can disagree, but I suspect the response would be that you would want to get most of the area in the south and central portion of the map.

But that is not what the Assembly Map does. In fact, it avoids much of this area, heading instead into politically marginal territory to the east.

Figure 2: Stockton Area Block Groups, by 2024 Presidential Election Result, with Assembly Map boundaries superimposed



Now suppose that, instead, I show you the following map, and tell you that your job is to draw a racial gerrymander. I again ask what areas you would want to be sure and include.

Figure 3: Stockton Area Block Groups, by estimated HCVAP



My guess is that you would want to include the triangle in central-eastern portion of the map, and the square to the southwest of it. This is *exactly* what the Assembly Map does, with near-surgical precision, in the process creating a district feature that is shaped vaguely like Scotland, only rotated 45 degrees clockwise.

Figure 4: Stockton Area Block Groups, by estimated HCVAP, with Assembly Map boundaries superimposed



Figure 5: Stockton Area Block Groups, by estimated HCVAP, with Assembly Map boundaries superimposed



Over the course of almost 100 pages of expert reports, the Opposing Experts attempt to distract from the obvious conclusion from the above: That the mapmaker prioritized racial results over partisan results. This is bolstered by a point made by plaintiff's own expert, Dr. Rodden. The map removes a substantial Hispanic population from the Southern portion of the map, which would lower the HCVAP. That removal, however, is countered by the addition of population in San Joaquin County that almost perfectly balances the HCVAP of the population removed to the South. By so doing, the district's HCVAP lands in a narrow band that characterizes the majority-Hispanic districts in the map overall. Again, this is accomplished by surgically carving out the Hispanic block groups from the other block groups in Stockton.

This is bolstered by three maps that demonstrate that this was not necessary to accomplish the mapmaker's partisan goals. A more straightforward partisan gerrymander

of the area, that does not reach across Stockton into two separate Census Designated Places, two of which include Democratic areas in the southern portion of the district that the Assembly Map also bypasses, produce similar or somewhat better partisan outcomes. This comes at the cost of a lower HCVAP, but that is the point; the only real reason to include these portions of the district is to include that Hispanic population.

No one really seems to dispute any of this. Instead, they bicker about data choices, suggest that the partisan and racial makeup of the districts doesn't really change all that much, and question some of the choices in the demonstration maps. Much of it is wrong; most of it is irrelevant. The bottom line remains that, as a part of a five-way split of San Joaquin County, these maps carefully cut up the Stockton area almost perfectly along racial lines, rather than political lines. That doesn't mean that there was no preference for politics; I have never taken that stance. What it does mean, though, is that when push came to shove, it was race, rather than politics, that got priority.

2 Overview and Background Assumptions

The Opposing Experts and I in many ways seem to be having a vicious agreement. In many instances the Opposing Reports cite to my report as proof of their claims. This not because of slip-ups or misunderstandings on my part. To the extent that we disagree, it would be about the *upshot* of these findings. In other words, we don't really disagree about the facts, we simply disagree about the relevance of those facts.

This is, of course, something for lawyers ultimately to argue about and lawyers to decide, but to summarize, my task was straightforward: To identify the best example of subverting traditional principles to racial goals, to explain it, and to draw maps that would achieve the partisan goals while meeting the other "non-racial" goals. That was found in District 13, particularly in the "peninsula" jutting into Stockton. I focused here particularly because, in my understanding, the Supreme Court has drawn attention to tentacles, appendages and the like as signs of a gerrymander. To be clear, these sorts of features can arise in both political and racial gerrymanders. The reason I think you can

distinguish between the two here is because the legislature bypassed an area of heavily Democratic non-Hispanics in favor of less-heavily Democratic Hispanics, distorting the district boundaries to do so. The alternative maps confirm that it would have been possible for the mapmaker to draw more heavily Democratic districts without sacrificing other goals, except perhaps the racial ones.

The areas of disagreement between myself and the Opposing Reports can probably be clarified and perhaps narrowed by setting forth some of my understandings of law. This isn't to tell the Court how it should rule on these issues—that's plainly for lawyers to argue about and judges to decide—but experts nevertheless are often required to operate under legal assumptions or understandings in order to carry out their examination. These are some legal assumptions or understandings under which I operated. Indeed, it seems like much of the disagreement between myself and the other three experts comes down to whether these assumptions are correct:

- A map can be a political gerrymander overall, but the 14th Amendment racial gerrymandering inquiry is district-specific. That is to say, it's possible for a map to have 51 districts that are drawn entirely with respect to politics and still have one district struck down because race predominated.
- A district can have parts that are drawn without respect to race, and parts that are, and still have race as a predominate interest. That is to say, if an otherwise-circular district has an odd-shaped appendage that reaches out to carve out a minority population, the district is drawn with racial intent, and that is a district in which race predominated.
- A district can have both partisan motives and racial motives. Given that race and partisanship often correlate, that might often appear to be the case. The question then becomes "which predominates?" That question can be answered by examining whether, when forced to choose, the mapmaker privileges the partisan outcome or the racial outcome. That's the focus of this report.

3 Response to Grofman Report

I begin with Dr. Grofman's report because it succinctly states the most relevant claims made in other reports. The opening theme of Dr. Grofman's report is that, taken as a whole, the Assembly map operates as a partisan gerrymander. Grofman Report ¶¶1-7. I certainly agree that the map achieves certain partisan goals. I don't think Modoc County was paired with Marin County for any reason other than partisanship. To the extent we have any disagreement, it is on the impact of that shared conclusion on particular districts.

Dr. Grofman claims that I am "nitpicking or cherry-picking the data." Grofman Report ¶12. I certainly disagree that I cherry-pick data. As for nitpicking, because racial gerrymandering is illegal, it wouldn't be surprising to see a capable map drawer produce a map where the devil is found in the details.

Next, Dr. Grofman offers an argument that is echoed across the other reports: "The Hispanic CVAP share of CD 13 actually goes down from the CRC map to the Prop 50 map, while in contrast, the Democratic share goes up by 3 percentage points in the Prop 50 map compared to the CRC map, using 2023 CVAP data." Grofman Report ¶12. His report, using 2023 data, describes the HCVAP of the district as 54% under the Commission lines, versus 53.8% under the Assembly Lines.

We actually don't know that the HCVAP is lower. The CVAP data are based upon the ACS. The ACS is a survey, rather than an actual enumeration like the decennial census. Like all surveys, it comes complete with error margins. At the congressional district level, the error margins are typically small—less than a percentage points—but the difference observed here is small as well. Regardless, the fact that the district is radically altered but the HCVAP remains the same, combined other facts in the report, buttresses the idea that this is a racial gerrymander, rather than working against it.

Dr. Grofman notes that there are places where "there were areas where Hispanic population could have been added but was not added." Grofman Report ¶12. In Madera,

the legislature does appear to exclude areas that are both Hispanic and Republican while including areas that are both Hispanic and Democrat. In other words, as between Hispanic Republicans and Hispanic Democrats, the legislature preferred the Democrats here. This is fully consistent with my overall opinion though. As among Hispanics, the preference was for Democrats – that choice doesn't impact race since we are talking about Hispanics either way. The problem comes when the choice is between similarly situated non-Hispanic Democrats and voters who are Hispanic-but-less-Democrat (or Republican). Someone drawing race-blind with partisan intent should select the latter at the expense of the former, especially if the former are less readily available.

In fact, Dr. Grofman's report illustrates an interesting effect. In Table 2A, it is noticeable that of the 16 majority-Hispanic districts reported, all but two fall in a narrow band between 51% and 55% HCVAP. In its submission to the commission, HOPE noted that "If these districts were between 52% and 54% Latino CVAP, for instance, they would still be very likely to elect Latino candidates of choice. The Commission may want to consider the optimal allocation of Latino CVAP in L.A. County so as to create one additional very-high Latino CVAP-majority or plurality districts in this area while retaining these four Latino-CVAP-majority districts." (Ex.A). Recall that this is the same group Mr. Mitchell was speaking to, cited in my initial report, where he emphasized that he had bolstered the VRA seats to make them most effective.

Dr. Grofman observes "Dr. Trende acknowledges that the Assembly map increased the Democratic vote share in the district compared to the CRC map." Grofman Report ¶12. This is true. It also, in my view, misses the point. Elsewhere in his report, Dr. Grofman distinguishes between an "efficient" gerrymander and a "fully efficient" gerrymander, with the latter occurring if the map is "drawn in such a fashion that its effects are likely to be durable." Grofman Report at 7. In other words, it is preferable to draw districts where the partisan advantage is likely to survive.

Dr. Grofman relies on the Cook Political Report's race ratings in describing the map. Grofman Report n.11. It shows that indeed, a number of California districts are

Figure 6: Cook Political Change in Race Ratings, Following Passage of Assembly Map

New California Race Ratings Changes

District	Current Member	Old Rating	New Rating	Direction
CA-01	Doug LaMalfa (R)	Solid Republican	Solid Democrat	←
CA-03	Kevin Kiley (R)	Likely Republican	Solid Democrat	←
CA-09	Josh Harder (D)	Lean Democrat	Solid Democrat	←
CA-22	David Valadao (R)	Lean Republican	Toss Up	←
CA-27	George T. Whitesides (D)	Lean Democrat	Solid Democrat	←
CA-40	Young Kim (R)	Lean Republican	Solid Republican	→
CA-41	Ken Calvert (R)	Lean Republican	Solid Democrat	←
CA-45	Derek Tran (D)	Toss Up	Lean Democrat	←
CA-47	Dave Min (D)	Lean Democrat	Likely Democrat	←
CA-48	Darrell Issa (R)	Solid Republican	Toss Up	←
CA-49	Mike Levin (D)	Likely Democrat	Solid Democrat	←

made safely Democratic. See <https://www.cookpolitical.com/ratings/house-race-ratings>. What is missing from the analysis is that Cook rates *District 13* as a “tossup.” This is confirmed in Dr. Grofman’s Table 1B, which shows that then-Vice President Kamala Harris won the district by just 0.5%. That’s an improvement over the Commission Map, but it would not seem to be “fully efficient” or necessarily even “efficient.” Driving the point home further, from an article to which Dr. Grofman cites: Cook Political made 11 race rating changes in response to the new map. These did not include District 13. Erin Covey, “California’s Newly Passed Map Spurs 11 Ratings Changes,” (Nov. 4, 2025), available at <https://www.cookpolitical.com/analysis/house/redistricting/californias-newly-passed-map-spurs-11-ratings-changes>. To be clear, it is more difficult for Republicans to win, but in the big picture, the district was considered a tossup before the redraw, and it is considered a tossup today. This might not be interesting if this were the best the map drawer could do, but it is not.

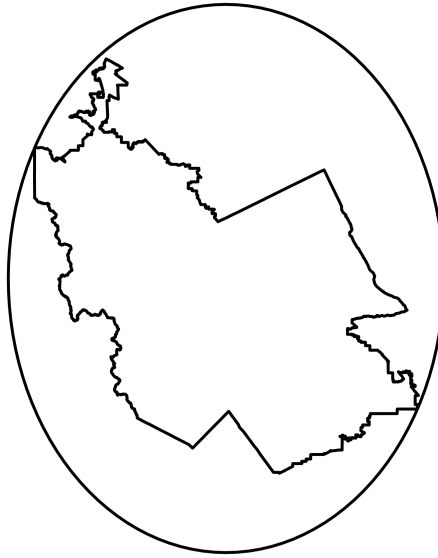
Dr. Grofman states that “Dr. Trende also asserts that it would have been possible to draw a more compact District 13 with fewer Hispanic voters,” before showing that some of the compactness numbers for the Demonstration Maps are higher and some are lower than the Assembly Map. Grofman Report ¶13. Respectfully (in a genuine sense, not

the passive aggressive way that term is often used), Dr. Grofman misstates my claim. After all, the compactness numbers are set forth in my report; there was no attempt to hide or elide this ball. The claim is that it is possible “to draw a district with a more regular configuration that does not target race.” Trende Report at 22. To understand this requires understanding two other things. In a footnote, Dr. Grofman writes “I am aware of no requirement to create the most compact district possible.” Grofman Report n.41. I concur. As I understand it, the purpose of such “Alexander” maps is to show that a mapmaker could have drawn a map without the racial features provided while also achieving other goals. Thus, I understood my task to be to provide a map with similar compactness scores, municipal splits, and political outcomes without the odd “reach” into northeastern Stockton, Garden Acres, and August that characterize the Assembly Map.

Second, to understand why I didn’t weight the lower Reock score heavily, we should understand what Reock scores measure. To calculate a Reock score, we draw the smallest circle around the district that we can that will not slice it. We call this the Minimum Bounding Circle. We calculate the area of that circle. We then calculate the area of the district. The Reock score is then the percentage of that circle that the district would fill. As a district becomes more elongated, the area of that circle that a district fills will generally fall.

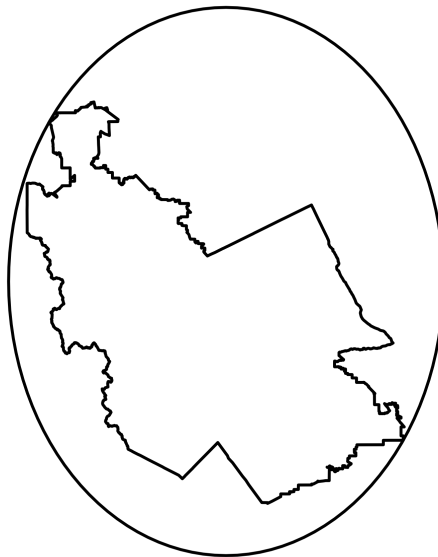
Reock scores are useful, but they have very real limitations. Consider the Assembly Map District 13, provided below with the Minimum Bounding Circle drawn around it (it appears as an oval here because of the curvature of the Earth. As you can see, the peninsula does not touch the Minimum Bounding Circle, and thus is irrelevant to its area.

Figure 7: Assembly District 13, with Minimum Bounding Circle



Now consider Map A:

Figure 8: Demonstration Map A, with Minimum Bounding Circle



There is no question, to my eye, that the northern boundary of this map is more

regularly configured. But because the peninsula touches the Minimum Bounding Circle slightly, it actually increases the area of that circle. However, the area of the district does not change much: The area of the Assembly Bill District is 3,853.3 square miles while that of Map A is 3,934 square miles. Thus, Map A technically does fill less of the district. Directly comparing the maps, however, it is plain to me which is more regularly shaped, but that is for the Court ultimately decide.

Map B illustrates another shortcoming of the Reock score. Here, the Minimum Bounding Circle once again increases a bit, because the district is brought out more consistently to the San Joaquin/Alameda county line. The area is roughly the same however, taking up 3,854.7 square miles. This, then, is the problem with Reock. One could remove the eastern “bulge” from Merced County and turn it into a meandering, snakelike series of precincts. As long as that appendage does not expand the minimum bounding circle or decrease the area of the district, the score will be unchanged. In fact, if the area of the district increases (by using larger, less densely populated precincts) it would improve the score.

Figure 9: Demonstration Map B, with Minimum Bounding Circle



That's why its important to consider a variety of scores, and why "eyeball tests," while imprecise, can be of use as well.

Dr. Grofman notes that things such as incumbent addresses place limitations on districts that can be drawn and that there is an incumbent who lives in Tracy. Grofman Report ¶14. That is the point of having multiple alternative maps, which show that there are configurations available that do not involve the City of Tracy. Note that neither Dr. Grofman nor any of the other experts ever state that I place the incumbent in question in District 13; it is left as a suggestion. I do not want to give out the name or the home address of an incumbent in closely watched, heavily charged litigation in our current environment for reasons that I think should be obvious. I will note that the incumbent's FEC filings list Manteca as his address. Regardless, I do not believe the relevant incumbent is ever placed in District 13 in any of the maps. To the extent the incumbent's residence in the City of Tracy is the relevant one, it is not placed in District 13.

Dr. Grofman suggests that I erred in calling Ceres "Republican territory." Grofman Report ¶15. He points to the 2024 Senate election, where the Democrat won 51.8% of the vote, and the 2018 governor's race, where he won 60%. But Adam Schiff won over 58% of the vote in 2024, while Gavin Newsom won over 61% of the vote in 2018. In all of these elections, Ceres was to the right of the Democrat. But, if Dr. Grofman would prefer to call it "swing" territory I could be persuaded to go along. Moreover, this is unhelpful without reference to any changes in vote share for other places in this area. In other words, the area might be more Democratic, depending upon which election one references, but this is irrelevant if the other areas in question are also even more Democratic.

He also suggests that the mapmaker might have looked at Adam Gray's historical performance in Ceres in his seven elections to the General Assembly. Dr. Grofman provides no citation for these results. I count five such elections, from 2012-2020, but regardless, I am not sure that the results are as compelling as he suggests. In 2018, his

opponent was a Libertarian. <https://elections.cdn.sos.ca.gov/sov/2018-general/sov/68-state-assemblymember.pdf>. By 2016 we are getting into decade-old election data, but in 2016, he obliterated a nominal Republican opponent by almost 40 points, suggesting a poor datapoint for forecasting a potentially competitive House district. That leaves 2012, 2014 and 2020 as years which were more competitive, with 2020 probably providing the only still-relevant data.

Dr. Grofman suggests that CD 9 and CD 5 are also part of the Democrats' political gerrymander. Grofman Report ¶¶16-18. The point of the alternative maps is that the mapmaker left areas on the table for District 5 that could have been useful in further shoring up CD 13, and appears to have done so primarily for racial reasons. As to District 9, it is true that redistricting is an exercise in robbing Peter to pay Paul, and that any move that makes District 13 more Democratic via San Joaquin County will necessarily make District 9 more Republican. The problem is that District 9 is made substantially more Democratic, largely on account of the appendage into overwhelmingly Democratic cities in Contra Costa County. Cook Political now rates it as "Solid Democrat." In other words, District 9 doesn't need the heavily Democratic White areas in Stockton to perform well or to be a part of a "fully efficient" gerrymander. But they would help District 13. In all of the three Demonstration maps, District 9 remains more Democratic than it was in the Commission Map, it remains more Democratic than District 13 was in the Commission Map, and it remains more Democratic than District 13 is in the Assembly Map.

4 Response to Mr. Fairfax

As noted above, many of the claims in the other two reports echo those made by Dr. Grofman. I will not repeat all of them here. Mr. Fairfax notes that District 13 in the Assembly Map is both more Democratic and less Hispanic than in the Commission Map. Fairfax Report, at 10-11. As explained above, that does not affect any of my conclusions.

With respect to Madera, Mr. Fairfax claims I "never state[] that region reflects

racial gerrymandering.” Fairfax Report at 11. In fact, I state the opposite. The point here is that these are not non-falsifiable analyses; there are examinations one can conduct with this approach that would not suggest a racial gerrymander.

Mr. Fairfax states that “the 13-color thematic map Dr. Trende uses has too many colors that blend together to be effective or comprehensible.” Fairfax Report, at 12. These type of choices are ultimately in the eye of the beholder, and all data visualizations have tradeoffs. Make the bands too broad, and you lose important granularity. Note that his map includes bands as wide as 20 points, with others as narrow as 10. More importantly, Mr. Fairfax misses the point of my maps. The color gradations run on a continuous scale, with the legend simply marking the color at certain points along the spectrum. This is important as well. One problem with Mr. Fairfax’s approach is that someone might look at a 49% HCVAP block group and a 51% HCVAP block group and conclude that they are radically different, when in fact their impact on a 700,000 person congressional district may be minimal. My approach keeps those block groups shaded roughly the same color; even if one can’t identify them with precision, one can certainly identify them as “close.” Mr. Fairfax’s approach, however, would treat this two point gradation the same as a 20-point gradation (40% versus 60%). There’s no “right” or “wrong” way to do this and both views can be useful; neither changes my conclusions.

Mr. Fairfax states that “His intent, I believe, is to show that the boundaries of CD 13 do not fully align with the region’s partisan divisions.” Fairfax Report at 14-15. What I meant was what I said: “Here, we can see the district boundaries much more neatly capturing the Democratic areas, although the area is overall politically marginal.” In other words, the district does carve out Democratic areas, capturing heavily Democratic areas while excluding Republican areas. I simply observe that overall, the area is marginal, which I think is true.

Mr. Fairfax faults me for not comparing the Legislative Map to the Commission Map around Ceres and Modesto. He claims that there was a similar bulge in the Commission Map. This missed the point. The Commission makes no claim that it relied

on politics, and I did not explore whether the Commission relied improperly upon race in drawing its district boundaries. Regardless, the Commission was operating under an entirely different set of constraints than the legislature, which makes for a poor comparator. Mr. Fairfax notes that I split Modesto and split both Ceres and Modesto in Map C. Again, this misunderstands my report. The concern is not that the Assembly map splits Ceres or Modesto as such, it is how they split those jurisdictions.

Mr Fairfax suggests that the reason that the Assembly map is split the way it is split is because it follows the boundaries of certain landmark areas in Modesto. As I understand it, to the extent “landmarks” area a mapmaker’s goal, the goal is typically to keep landmark areas together rather than to use them as a boundary to follow. I’m also unsure that they have ever been a part of the criteria for California map drawing. Regardless, this is all an exercise in robbing Peter to pay Paul. The legislative map follows certain Landmark boundaries, but so too did the Commission plan. Moreover, my understanding is that everyone agrees that the Assembly Map is a gerrymander; the only disagreement is as to what kind of gerrymander this is. One presumes that Landmarks, however defined, were not something likely to stand in the way between the mapmaker and his goals.

Mr. Fairfax then turns to Stockton. Mr. Fairfax hypothesizes that “a straightforward answer to Dr. Trende’s question about leaving Democrats out of CD 13 is that the legislature did not seek to lower Democratic performance in CD 9, the adjacent district.” This might be credible if CD 9 were also a tossup district, or would become a tossup district if these voters were included in CD 13. But no one provides any evidence that this might be the case, because there is no such evidence. CD 9 is safely Democratic, regardless of whether or not these voters are included within its boundaries.

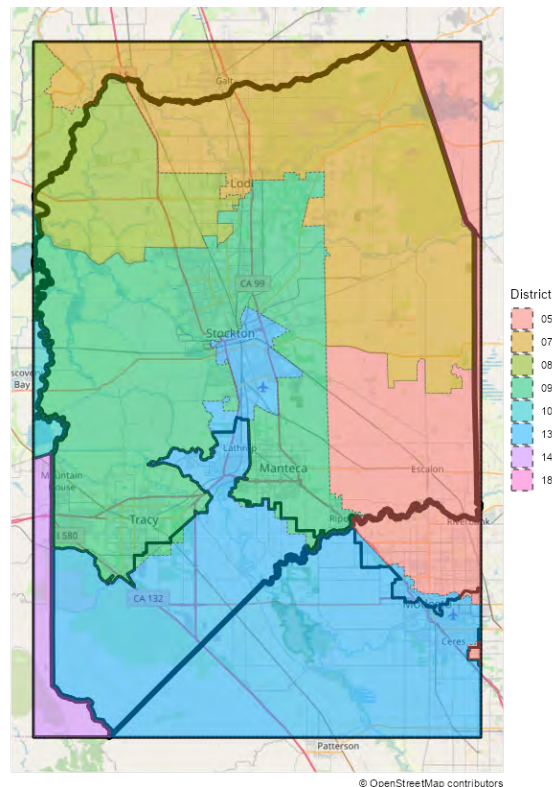
Mr. Fairfax dismisses the claim that the plume into San Joaquin County is of any interest because the Commission Map extended into San Joaquin. Fairfax Report, at 20. This misconstrues what I actually said: “But the northern split, near Stockton, is one of the more egregious examples. The large plume off the top of the district might

make sense as a Democratic gerrymander at first blush.” *Trende Report*, at 16 (emphasis supplied). In other words, I wasn’t focusing on San Joaquin being split, I was focusing on its odd-shaped extension into Stockton.

Mr. Fairfax claims that “[t]he 2025 Plan merely extends the district further into San Joaquin. This is important because the extension was not first created in the 2025 Plan. It had already started in the 2021 Plan.” But the extension, such as it was, in the Commission Plan was simply adding the entire city of Lathrop to the district. Not one doubts that following city boundaries can result in ungainly district lines. But nothing in the inclusion of Lathrop demanded that the district later be stretched into Stockton. More importantly, nothing demanded that the district bypass the first heavily Democratic areas one encounters when heading northbound to grab other areas.

Finally, to my eye at least, examining a map of San Joaquin County in the Commission Map, versus in the Assembly Map is sufficient to reject a claim that the Assembly Map merely reflects an extension or alteration to the Commission Map. In the map below, the colored districts demarcated by dotted lines reflect the Assembly Map 5-way split of San Joaquin. The solid line reflects the Commission Map split. This is something ultimately for the Court to decide, but to my eye, the “plume” into Stockton is meaningfully different in the Commission Map.

Figure 10: Five-Way Division of San Joaquin County, Assembly Map, Compared to Two-Way Division in the Commission Map



Mr. Fairfax complains that I don't show municipalities or communities of interest, such as census-designated places or socioeconomic data. First, that's not entirely true, since I note that the Demonstration maps all split as few or fewer boundaries than the Legislative Map, which splits French Camp, Stockton, Garden Acres and August. Mr. Fairfax claims that the split of August is to conform with a census tract boundary, but it also seems notable that the area that the map excludes has an estimated 32% HCVAP, the only area in August where Hispanics are not reported as a majority. But this is the type of analysis in which one typically engages when trying to determine whether a map is a "good government" map, or *whether* it is a gerrymander. Here, no one seems to dispute that this is a gerrymander. The only dispute is over what type of gerrymander it represents.

Again, the explanation that continues to be lacking is why one would bypass a

heavy cluster of voters just to the west of the interstate, just as one enters Stockton from the south, in favor of a less heavily Democratic group of voters across town and in other towns. After all, the point is that the areas in Stockton to the west of I-5 and south of the Ort Lofthus Expressway have about 26,000 residents and went for Kamala Harris by around 30 points. Garden Acres and August have about 20,000 residents, but went for her by 6. It makes no sense from a political gerrymandering perspective to include the latter but exclude the former. If, however, you want to hit a racial target, including the roughly 70% estimated HCVAP area in the latter versus the roughly 35% estimated HCVAP area in the former makes much more sense. Again, the entire point of the Illustrative Maps is that one can achieve better political performance in District 13 by making exactly these types of obvious decisions; it just results in a lower HCVAP.

Mr. Fairfax then provides a map of census tract level geographies shaded by degree of high school education. There are three problems with this. First, it's obvious that the Assembly Map does not, in fact, adhere to the socioeconomic boundaries Mr. Fairfax describes. Second, along these lines, there's no real evidence that the mapmaker considered this factor and (more seriously) that if they did, they would be particularly motivated by the difference between a tract with, say, 71% high school education and 74% high school education. Mr. Fairfax is careful to avoid this claim. Third, and most importantly, if these were, in fact, important communities of interest, rather than an attempted post-hoc rationalization, one assumes that they would be included in the map drawn by an independent body laboring under a demand that communities of interest be kept together, and not knitted together via legislation that suspended that requirement as a part of an express attempt to counteract Republican political gerrymandering in Texas. No one, to my knowledge, claims that this is a good government map, and I conducted my analysis accordingly.

Mr. Fairfax continues with the type of "standard" analysis when "analyzing allegations of racial gerrymandering." But again, no one claims that this map reflects anything but a political gerrymander, and it makes no sense to analyze it under traditional re-

districting criteria that were suspended. Moreover, some of the criteria that he includes are obvious for any map: That the map meets one-person-one-vote requirements and is contiguous is not the type of thing a map should be rewarded for.

Mr. Fairfax concludes by examining my districts, and claims that they include non-contiguous areas and fail to meet one-person-one-vote requirements. Fairfax Report at 30. I honestly do not know what he is referring to. I created the maps in Dave's Redistricting, a commonly used software package that is routinely employed to draw congressional and state legislative maps. To doublecheck myself, I re-loaded my copy of Map A to see if the files had somehow become corrupted. As the following screenshots show, there is no evidence of population deviations or non-contiguous districts.

Figure 11: Contiguity Report for Dave's Redistricting. The gray entries suggest no unassigned areas or non-contiguous districts

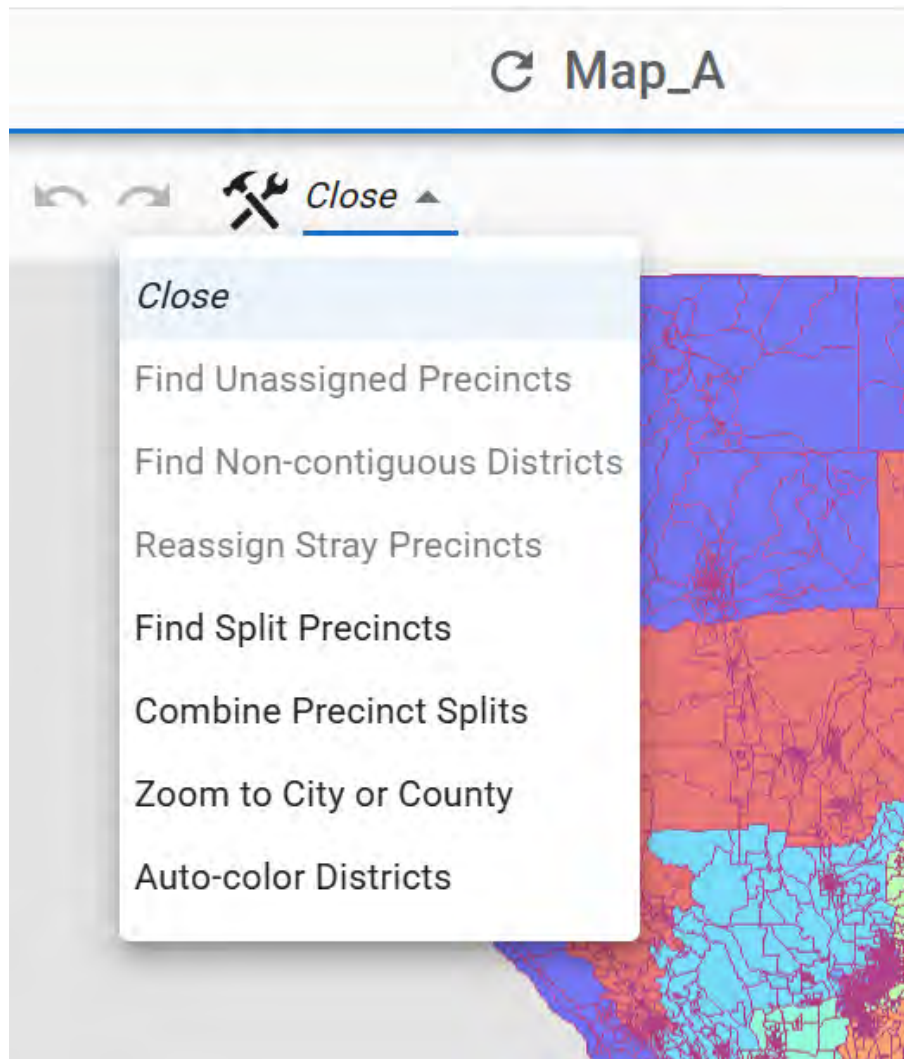





Figure 12: Population Deviations, from Dave's Redistricting

	District		Population	Deviation
	Un		0	0
	1		760,065	-1
	2		760,065	-1
	3		760,067	1
	4		760,065	-1
	5		760,066	0
	6		760,067	1
	7		760,065	-1
	8		760,066	0
	9		760,066	0
	10		760,066	0
	11		760,067	1
	12		760,065	-1
	13		760,066	0
	14		760,065	-1
	15		760,066	0
	16		760,066	0
	17		760,067	1
	18		760,066	0
	19		760,067	1
	20		760,065	-1

What makes this more bizarre is that Mr. Fairfax finds the supposed non-contiguous areas in places like the district 1-2 boundary, along the California/Arizona state line, or in the Channel Islands; none seem to occur in the actual districts I examine. The natural conclusion from something like this would seemingly be an error.

But to be absolutely clear, I never changed these district lines, did not have occasion to look at these district lines when drawing the demonstration maps, and these district lines are not changed even when I re-load the map into my redistricting software. The only thing I altered in any way was the district boundaries between district 5, 9 and 13. I genuinely have no explanation for Mr. Fairfax's findings.

In the interest of disclosure, I *did* find three stray census blocks in Map C across District 13 and District 5. But these are all zero population and would not affect the calculations were they assigned to the correct district.

Beyond this, Mr. Fairfax writes "All of Dr. Trende's demonstrative plans have the same boundaries for the Madera area as the 2025 Plan (see Appendix E). It is curious why he chose to follow the exact boundaries that he included in his analysis report on race predominance." Fairfax Report, p. 35. There is nothing curious about this. I expressly state politics predominated over racial considerations here. I also do not change the western boundary of the district, which obviously follows a county boundary. The point of an "Alexander map," as I understand it, is simply to show that the same goals of the mapmaker could have been achieved without the racial considerations.

He next writes "[f]or the Modesto/Ceres area for CD 13, Dr. Trende's Plan A's CD 13 contains the exact boundaries as the 2025 Plan (see Appendix E). Once again, it is curious why he chose to follow the same boundaries he questioned as evidencing race predominating. Dr. Trende's Plans B and C show changes from the 2025 Plan in the Modesto region: in both, the boundaries are drawn in a less compact manner than the 2025 Plan, and Plan C splits Ceres." As to the compactness, see my discussion under Dr. Grofman's claims. The reasons I kept the Modesto lines intact in Map A are twofold. First, there's no guarantee the Court will agree with me about Modesto, so I wanted

a map that left that area intact to show that the goals could be met without changing Modesto. Plan C does split Ceres but that should not be a problem, as Mr. Fairfax elsewhere ignores slight changes in splits for the Assembly Map vis-à-vis the Commission Map.

Mr. Fairfax complains that I include a large block group in Map A that is Republican-leaning. I do so because some of the area falls within the Stockton boundaries. I could have split it, but it helps with compactness, and it cast only 204 votes in the 2024 election; it does not measurably upset the partisan goals of the map. He also notes that I include some of the “plume” into Stockton. But of course the point is to illustrate what an effective partisan gerrymander would look like, if it were not subordinated to racial concerns. It is not to draw a good government map.

Mr. Fairfax observes that I avoid a Democratic area in French Camp and Democratic areas to the east of Tracy. Herein lies the danger of reporting data in “bins” rather than on a continuous scale. The “high-Democratic area in yellow with a square notch carved out in the north (to include French Camp CDP),” does, in fact, serve to keep French Camp intact, which Mr. Fairfax has elsewhere described as a reasonable consideration. More importantly, the area to which he refers voted for Harris 49% to 48.7%. This is not a “high-Democratic” area and including it would actually weaken Democratic performance in the district. He’s correct that it probably would have been a marginally better gerrymander if I had included the block at the northern tip of the district that went 161-84 for Harris. The difference is that there’s no evidence that this was done in pursuit of a racial target. Mr. Fairfax also notes the non-compact exclusion of the areas to the east of Tracy. This is plainly done for political purposes. One of the two areas in the southern portion of San Joaquin to the east of Tracy gave Harris 75 votes to Trump’s 75, while the other one went 199 for Trump to 112 for Harris. Using the 2020-2024 composite from Dave’s Redistricting, the former is 53.2% Republican to 46% Democrat, while the latter is 63.1% Republican to 36.6% Democrat. Neither would help the map’s Democratic performance; in a subsequent iteration I included them to smooth

out the district boundary.

Finally, Mr. Fairfax observes that “Plans A, B, and C do not present any appreciable increase in the Democratic performance of CD 13 over the 2025 Plan.” Fairfax Report at 38. This, again, misses the point of the exercise. The point is that one does not need to extend into heavily Hispanic areas of Stockton in order to hit a political target. In fact, it makes better sense not to do so. The only reason to do so is for a racial target. Mr. Fairfax can dismiss the improvements in Democratic performance as “not appreciable,” but this is an area that has routinely been marked by races decided by a few hundred votes. The idea that even a slight improvement in performance is not meaningful is belied by history here.

5 Response to Dr. Rodden

It simply isn’t possible to respond to every word in Dr. Rodden’s 31-page, single spaced report here (I say that with a touch of admiration for the volume of analysis produced, not to be snarky). Fortunately, much of it has been responded to in the earlier portions of this report. In the big picture, Dr. Rodden finds fault with the fact that I failed to discuss the previous iteration of the map. Rodden Report at 3, 4. But that endeavor assumes that the previous map can meaningfully be said to have provided the basis for the current map. As he observes, the previous map was altered substantially, and I’m unsure of the utility of comparing the current map to a map that was drawn under an entirely different set of constraints.

One quick clarification is useful, however: I focused my analysis on recent elections. I did so for two reasons. First, as a map drawer and elections analyst, the most recent data are generally the most helpful, all other things being equal. This is especially true where large numbers Hispanic voters are involved, since they have (somewhat famously) trended toward the GOP in recent years. In the absence of statements from the map drawer that older data were relied upon, or a legislative command to use older data (as is the case in Ohio, with which Dr. Rodden and I are both familiar), I would have a strong

preference for the newer data. The maps which I provided use 2024 presidential results. If this was not adequately clear from my maps, it should have been clear from the code that I provided.

Regardless, Dr. Rodden shows that the rural area removed from the southern area of the Commission's District 13 had an HVAP of 72% and an estimated HCVAP of 60%. He then shows that the portion added to the District from San Joaquin County had an HVAP of 68% and an estimated HCVAP of 62%. The area added to the district, however, was more heavily Democratic. The net effect was little change in the overall composition of the district.

I'm not sure this shows what Dr. Rodden suggests that it shows; if anything this seems to help the claim plaintiffs are making. Dr. Rodden seems to suggest that 100,000 residents were removed from the southern end of the district, while another 100,000 were added, with a completely different socio-economic and political profile, and yet the HVAP and HCVAP, without any racial cues, remained unchanged. Moreover, the ultimate HCVAP fell directly within the range that an interest group to which the map drawer speaks regularly had suggested, along with 13 other districts in the same map. I'm not sure what the chances of this occurring randomly are, but they seem low. What combined with the evidence above about how the Modesto and Stockton areas were drawn, the conclusion seems to be that race played an overwhelming role in configuring the district.

In other words, this evidence Dr. Rodden describes would provide a firmer foundation for what the Trende Report finds. The way this balance is achieved is by driving the extension into Stockton past less heavily Hispanic (but more Democratic) territory in the city, through the City of Stockton, and into August and Garden Acres. Without that move, the district doesn't maintain the racial balance Dr. Rodden describes. This is what the Demonstration Maps actually demonstrate.

Dr. Rodden suggests that without evidence of "a racial asymmetry between the areas moved into and out of the challenged district . . . it is difficult to see how

one might suggest race or ethnicity was the predominant driver in the reconfiguration of the district.” Rodden Report, at 8. The answer would be the same as it is with any other racial gerrymandering claim: By demonstrating that absent racial considerations, the racial makeup would have been different, and that there are areas where race seemed to predominate over other considerations. Indeed, if a racial target is involved that the previous iteration of the district met, this is exactly what we would expect to happen.

Indeed, I have been involved in cases where district courts have raised their eyebrows at “too neat” outcomes. One of them, to which Dr. Rodden cites (*Alexander v. S.C. Conf. of the NAACP*, 602 U.S. 1 (2024)) involved precisely the finding that Dr. Rodden describes (it was too unlikely that the racial makeup of a district would remain unchanged). While this case (and the recent Texas case) were rejected by the Supreme Court, it was largely because plaintiffs in those maps, unlike the ones here, did not offer demonstration districts that show other configurations were available that achieve the non-racial goals of the map – here, mostly, partisan outcome – while avoiding the racialized line-drawing aspects of the line drawing. Again, the more natural way to draw the map, even when gerrymandering politically, is to avoid those reaches. Unless, of course, the non-negotiable concern is that one wants to keep the HCVAP in the district from falling.

Dr. Rodden describes the difficulty in translating precinct shares to census block and other census levels in California. While I’m not familiar with every in-and-out of California’s system of election administration, I do know that the relationship between California’s precincts and census geographies is at best complex, and that precinct boundaries sometimes don’t always line up neatly with census blocks. This is part of why I reproduce maps from Dave’s Redistricting, rather than drawing my own maps, as Dr. Rodden knows is my typical approach. Because of the disaggregation issues, I thought it was best to employ a neutral source upon which multiple experts rely than to attempt my own allocation of population data from split blocks and precincts.

With that said, to my understanding *everyone* suffers from this blurring issue,

at least to some extent, both from political data and from population data. A 14th Amendment claim focuses on intent. By reflecting the data as a map drawer might encounter it, we can probe intent. Note too that Dr. Rodden refers to vote share data with precision throughout his report, notwithstanding any “blurring” issues that might be present.

Dr. Rodden uses dot density maps as an alternative approach to the choropleth maps that I offer. I, too, employ dot density maps from time-to-time. They can be useful but also have substantial shortcomings. For one thing, the heavy rounding employed can give an illusions of “empty” space, when in fact an area has a fair number of residents. This is particularly true in some of Dr. Rodden’s maps where a single dot might represent 100 residents. To wit: in his dot density map of Modesto and Ceres, the block group to the southeast of Ceres looks practically empty. In fact, it has 830 residents (curiously, it appears to have nine dots). The block group to its east has 833 residents. Second, because of something called “overplotting,” densely populated areas can be misleading. One dot layer has to be placed on top of the other; this can distort the ratio between groups. Third, I am unaware of anyone drawing maps primarily with dot density maps in front of them. Most mapping programs provide choropleth maps. This is because a dot density map is unhelpful for this purpose. An area with a large number of Republican votes – say 40 red dots in a relatively small area – may look tempting. But it might just be a heavily populated area with 60 blue dots. Unless the eye can distinguish between a 40-60 split of tiny red dots and, say, a 50-50 split, the mapmaker would be led astray. This is why I’ve traditionally used choropleth maps to illustrate intent, while I utilize dot density maps to illustrate the compactness of different groups.

Dr. Rodden claims that the appendage follows the city boundaries of August and Garden Acres. Rodden Report at 17. As discussed above, this is untrue. In fact, the one area of August that is excluded has a reasonable population (around 600) and involves an area that has a low Hispanic CVAP. The split of Garden Acres is smaller (two residents) but nevertheless present.

Dr. Rodden explains that the areas outside the Garden Acres/August boundary become Republican and rural quickly. But the question is not “why doesn’t the district stretch beyond Garden Acres or August?” It is “why does it stretch that far at all?” As explained above, Garden Acres and August have been politically marginal territory in recent years. They do, however, have very high HCVAPs. What’s more interesting is that the map stretches here while passing by the densely packed, more readily accessible cluster of blue dots to the west of the district boundary, as illustrated by Dr. Rodden’s map on page 18.

Dr. Rodden later claims that this district calls to mind the 2000 district lines, and that this map merely “bring[s] back this configuration.” Rodden Report at 21. This is interesting speculation, but I’m unsure what a rough similarity to district lines drawn almost a quarter century ago, when California had almost 6 million fewer residents (at a time when political gerrymandering was legal), tells us about today. To the extent that a discussion of this map is useful, note that the western edge includes much of western Stockton that is excluded today.

Dr. Rodden observes that “it cannot always be possible for a party-motivated district-drawer to grab every conceivable partisan due to” a variety of considerations. Rodden Report at 23. That is the purpose of illustrative maps. Dr. Rodden, like other experts, posits that the need to make District 9 more Democratic acted as a constraint. But once again, the data rich report is suddenly barren of actual data here. That is because District 9 remains strongly Democratic in all of the Demonstration Maps. Moreover, here it is Dr. Rodden who offers only a partial look at the district. District 9 becomes more Democratic not due to changes here, but by adding 214,000 voters in Contra Costa County, who gave Kamala Harris a 30-point win. As he notes, “the Democratic vote share of District 13 increased by around 3 percentage points, [but] the Democratic vote share of District 9 increased by more than 6 percentage points.” Rodden Report at 23. But District 9 was less in need of “help” than was District 13; District 9 was the more Democratic of the two districts to start. Yet it receives the larger increase in Democratic

vote share. Regardless, in Map A, Harris won District 9 by 11 points; in maps B and C, Harris won it by 12 points. Keeping District 9 safely Democratic was not a constraining factor.

Dr. Rodden claims that I “made efforts” to further reduce the Hispanic voting-age population share of District 13. In fact, what I did was to try to draw a Democratic district without further distorting the overall district boundary. That required little effort. That’s just the point: Extending into August and Garden Acres isn’t a natural choice unless one has a racial target to hit.

Dr. Rodden claims that I maintain boundaries that I claim provide evidence of racial gerrymandering. Rodden Report at 26. As noted above, I didn’t change Modesto because the Court might disagree about the Modesto line drawing and I wanted a map that reflected that possibility. I kept the eastern boundary of the district because going to the east would either introduce a split in Manteca – where the FEC claims an incumbent lives – or extend the boundary of the district even further. But the problem isn’t that the district doesn’t go far east enough, it is that it goes needlessly east, ignoring a trove of Democratic-but-not-Hispanic voters in the southwest of the district (where my demonstration maps do go). Incidentally, the map on page 27 shows the problem with dot density maps; Manteca, to my eye, appears overwhelmingly Republican, while it has, in fact, been politically marginal territory for years (Trump won it by six points in 2024, after losing it by single digits in 2016 and 2020).

In a footnote, Dr. Rodden observes that, using 2022 and 2024 elections, the district becomes slightly more Democratic. As the tables in my initial report make clear, and for the reasons explained above, these are the elections upon which I relied. Rodden Report, nn.12-14.

6 Conclusion

Nothing in the Opposing Experts’ Reports changes any of my conclusions. Race predominated in the drawing of District 13. It balances the removal of Hispanic voters

to the South almost perfectly by carving up the district along racial lines in the Stockton and Modesto areas. This is the forest, and it shouldn't be obscured by the trees to which the Opposing Experts attempt to point.

I declare under penalty of perjury under the laws of the State of Ohio that the foregoing is true and correct to the best of my knowledge and belief. Executed on December 10th, 2025 in Delaware, Ohio.

Sean P Trende

Sean P. Trende

7 Exhibit 1 – Sean Trende C.V.

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EDUCATION

Ph.D., The Ohio State University, Political Science, 2023. Dissertation titled *Application of Spatial Analysis to Contemporary Problems in Political Science*, September 2023.

M.A.S. (Master of Applied Statistics), The Ohio State University, 2019.

J.D., Duke University School of Law, *cum laude*, 2001; Duke Law Journal, Research Editor.

M.A., Duke University, *cum laude*, Political Science, 2001. Thesis titled *The Making of an Ideological Court: Application of Non-parametric Scaling Techniques to Explain Supreme Court Voting Patterns from 1900-1941*, June 2001.

B.A., Yale University, with distinction, History and Political Science, 1995.

PROFESSIONAL EXPERIENCE

Law Clerk, Hon. Deanell R. Tacha, U.S. Court of Appeals for the Tenth Circuit, 2001-02.

Associate, Kirkland & Ellis, LLP, Washington, DC, 2002-05.

Associate, Hunton & Williams, LLP, Richmond, Virginia, 2005-09.

Associate, David, Kamp & Frank, P.C., Newport News, Virginia, 2009-10.

Senior Elections Analyst, RealClearPolitics, 2010-present.

Columnist, Center for Politics Crystal Ball, 2014-17.

Visiting Scholar, American Enterprise Institute, 2018-present.

BOOKS AND BOOK CHAPTERS

Larry J. Sabato, ed., *The Red Ripple*, Ch. 15 (2023).

Larry J. Sabato, ed., *A Return to Normalcy?: The 2020 Election that (Almost) Broke America* Ch. 13 (2021).

Larry J. Sabato, ed., *The Blue Wave*, Ch. 14 (2019).

Larry J. Sabato, ed., *Trumped: The 2016 Election that Broke all the Rules* (2017).

Larry J. Sabato, ed., *The Surge: 2014's Big GOP Win and What It Means for the Next Presidential Election*, Ch. 12 (2015).

Larry J. Sabato, ed., *Barack Obama and the New America*, Ch. 12 (2013).

Barone, Kraushaar, McCutcheon & Trende, *The Almanac of American Politics* 2014 (2013).

The Lost Majority: Why the Future of Government is up for Grabs – And Who Will Take It (2012).

PREVIOUS EXPERT TESTIMONY AND/OR DEPOSITIONS

Dickson v. Rucho, No. 11-CVS-16896 (N.C. Super. Ct., Wake County) (racial gerrymandering).

Covington v. North Carolina, No. 1:15-CV-00399 (M.D.N.C.) (racial gerrymandering).

NAACP v. McCrory, No. 1:13CV658 (M.D.N.C.) (early voting).

NAACP v. Husted, No. 2:14-cv-404 (S.D. Ohio) (early voting).

Ohio Democratic Party v. Husted, Case 15-cv-01802 (S.D. Ohio) (early voting).

Lee v. Virginia Bd. of Elections, No. 3:15-cv-357 (E.D. Va.) (early voting).

Feldman v. Arizona, No. CV-16-1065-PHX-DLR (D. Ariz.) (absentee voting).

A. Philip Randolph Institute v. Smith, No. 1:18-cv-00357-TSB (S.D. Ohio) (political gerrymandering).

Whitford v. Nichol, No. 15-cv-421-bbc (W.D. Wisc.) (political gerrymandering).

Common Cause v. Rucho, No. 1:16-CV-1026-WO-JEP (M.D.N.C.) (political gerrymandering).

Mecinas v. Hobbs, No. CV-19-05547-PHX-DJH (D. Ariz.) (ballot order effect).

Fair Fight Action v. Raffensperger, No. 1:18-cv-05391-SCJ (N.D. Ga.) (statistical analysis).

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Montana Democratic Party v. Jacobsen, DV-56-2021-451 (Mont. Dist. Ct.) (early voting; ballot collection).

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Moore et al., v. Lee, et al., (Tenn. 20th Dist.) (state constitutional compliance).

Milligan v. Allen, Case No. 2:21-cv-01530-AMM (N.D. Ala.) (VRA).

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Robinson v. Ardoin, NO. 22-211-SDD-SDJ (M.D. La.) (VRA).

Republican Party v. Oliver, No. D-506-CV-2022-00041 (N.M. Cir. Ct. (Lea County)) (political gerrymandering).

Palmer v. Hobbs, Case No. 3:22-CV-5035-RSL (W.D. Wash) (VRA; remedial phase only).

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Stone v. Allen, No. 2:21-cv-1531-AMM (N.D. Ala.) (VRA).

Milligan v. Allen, No. 2:21-cv-01530-AMM (S.D. Ala.) (VRA).

Agee et al. v. Benson, et al., (W.D. Mich.) (racial gerrymandering/VRA).

Faatz, et al. v. Ashcroft, et al., (Cir. Ct. Mo.) (state constitutional compliance).

Coca, et al. v. City of Dodge City, et al., Case No. 6:22-cv-01274-EFM-RES (D. Kan.) (VRA).

Pierce v. NC State Board of Elections, Case No. 4:23-cv-193 (E.D.N.C.) (VRA).

Williams v. Hall, Civil Action No. 23 CV 1057 (M.D.N.C.) (VRA, Racial Gerrymandering).

Hodges v. Passidomo, Case No. 8:24-cv-879-CEH-TPB-ALB (M.D. Fla.) (Racial Gerrymandering).

Cubanos Pa'Lante v. Florida House of Representatives, Case No. 24-cv-21983-JB (S.D. Fla.) (Racial Gerrymandering).

Coads v. Nassau County, Index No. 611872/2023 (N.Y. Sup. Ct., Nassau County) (political gerrymandering, racial gerrymandering, NYVRA).

Harris v. DeSoto County, Civil No. 3:24-CV-00289-GHD-RP (N.D. Miss.) (VRA).

League of Women Voters v. Utah State Legislature, Case No. 22090712 (Utah Dist. Ct.) (Partisan Gerrymandering).

COURT APPOINTMENTS

Appointed as Voting Rights Act expert by Arizona Independent Redistricting Commission (2020)

Appointed Special Master by the Supreme Court of Virginia to redraw maps for the Virginia House of Delegates, the Senate of Virginia, and for Virginia's delegation to the United States Congress for the 2022 election cycle.

Appointed redistricting expert by the Supreme Court of Belize in *Smith v. Perrera*, No. 55 of 2019 (one-person-one-vote).

INTERNATIONAL PRESENTATIONS AND EXPERIENCE

Panel Discussion, European External Action Service, Brussels, Belgium, Likely Outcomes of 2012 American Elections.

Selected by U.S. Embassies in Sweden, Spain, and Italy to discuss 2016 and 2018 elections to think tanks and universities in area (declined Italy due to teaching responsibilities).

Selected by EEAS to discuss 2018 elections in private session with European Ambassadors.

TEACHING

Introduction to the Policy Process, Spring 2025.

American Democracy and Mass Media, Ohio Wesleyan University, Spring 2018.

Introduction to American Politics, The Ohio State University, Autumns 2018, 2019, 2020, Spring 2018.

Political Participation and Voting Behavior, Springs 2020, 2021, 2022, 2023.

Survey Methodology, Fall 2022, Spring 2024.

PUBLICATIONS

James G. Gimpel, Andrew Reeves, & Sean Trende, “Reconsidering Bellwether Locations in U.S. Presidential Elections,” *Pres. Stud. Q.* (2022) (forthcoming, available online at <http://doi.org/10.1111/psq.12793>).

REAL CLEAR POLITICS COLUMNS

Full archives available at http://www.realclearpolitics.com/authors/sean_trende/