

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

GEORGIA STATE CONFERENCE OF ) No.  
NAACP, et al., ) 1:21-CV-5338-ELB-SCJ-  
 ) SDG  
Plaintiff, )  
 )  
vs. )  
 )  
STATE OF GEORGIA, et al., )  
 )  
Defendant. )  
\_\_\_\_\_)

VIDEOTAPED 30(b)(6) and 30(b)(1) DEPOSITION OF  
LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE  
(MS. GINA WRIGHT)  
January 26, 2023  
9:17 a.m.  
18 Capitol Square SW  
Atlanta, Georgia

Reported by: Marcella Daughtry, RPR, RMR  
CA CSR 14315  
GA No. 6595-1471-3597-5424



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1 VIDEOTAPED DEPOSITION OF GINA WRIGHT  
2 was taken on January 26, 2023 at the Coverdell  
3 Legislative Office Building, 18 Capitol Square SW,  
4 Atlanta, Georgia, commencing at the hour of 9:17 a.m.  
5 before Marcella Daughtry, a Registered Professional  
6 Reporter and Registered Merit Reporter, in and for the  
7 State of Georgia and State of California.

8  
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21 Also Present:

22 Shawn Marie Story, Deputy Legislative Counsel

23 Eric Lucas, videographer

24 Jason Enos



1 THE VIDEOGRAPHER: Today's date is  
2 January 26th, 2023, and the time is approximately 9:17  
3 a.m. This will be the videotaped deposition of Gina  
4 Wright.

5 Would counsel present and on the Zoom please  
6 identify themselves for the record.

7 MR. CANTER: Jacob Canter representing the  
8 plaintiffs.

9 MR. DAVIS: Alex Davis, Lawyers' Committee for  
10 Civil Rights, representing the Georgia NAACP plaintiffs.

11 MS. HORSTMAN: Raija Horstman from Crowell  
12 Moring, also for the Georgia NAACP plaintiffs.

13 MR. TYSON: Bryan Tyson, and Diana LaRoss will  
14 be joining me on behalf of the defendants.

15 MR. JAUGSTETTER: I am Patrick Jaugstetter, and  
16 I am here on behalf of the witness, Gina Wright.

17 THE VIDEOGRAPHER: Counsel on Zoom, please  
18 identify themselves for the record.

19 MS. HOUK: Good morning. Julie Houk with the  
20 Lawyers' Committee for Civil Rights Under Law  
21 representing the Georgia NAACP plaintiff group.

22 MS. LOVE: Good morning. Cassandra Love from  
23 Dechert representing the common cause plaintiffs.

24 MR. ROLLINS-BOYD: Marlin David Rollins-Boyd  
25 representing the Georgia NAACP plaintiffs for the



1 Lawyers' Committee Under Civil Rights Under Law.

2 MR. ENOS: Jason Enos, Lawyers' Committee for  
3 Civil Rights Under Law, observing only, not making an  
4 appearance.

5 THE VIDEOGRAPHER: Would the court reporter  
6 please swear in the witness.

7 MR. STEINER: This is Neil Steiner from  
8 Dechert, also on behalf of the common cause.

9 THE REPORTER: Say your name again.

10 MR. STEINER: Neil Steiner.

11 THE REPORTER: Thank you.

12 THE VIDEOGRAPHER: Would the court reporter  
13 please swear in the witness. Thank you.

14  
15 GINA WRIGHT,  
16 called as a witness herein, having been first duly sworn  
17 by the shorthand reporter to speak the truth and nothing  
18 but the truth, was examined and testified as follows:

19  
20 EXAMINATION

21 BY MR. CANTER:

22 Q Good morning, Director Wright.

23 A Good morning.

24 Q What was your role in drawing the Congressional  
25 map which Governor Kemp signed into law?



1           A    I'm the person who drew it, worked with the  
2           technology to draw the map.

3           Q    Who at your office did you work with in drawing  
4           the Congressional map?

5           A    Like staff of the office; is that what you  
6           mean?

7           Q    Yes, ma'am.

8           A    No one else.

9           Q    Did Brian Knight help you draw the map?

10          A    No.

11          Q    Did Dan O'Connor help you draw the map?

12          A    No.

13          Q    Rob Strangia?

14          A    No.

15          Q    Bryan Tyson?

16          A    He's not staff at my office.

17          Q    That's fair.

18                But did Bryan Tyson help you draw the map?

19          A    Bryan Tyson consulted as the attorney that was  
20          counsel on that.

21          Q    Did Brian Knight help you with the map drawing  
22          for the Congressional map in any way?

23          A    No.

24          Q    Did you speak with him about the map?

25          A    Not to my recollection.



1 Q Did he see the map ever?

2 A After it was made public.

3 Q How about before it was made public?

4 A I don't recollect him seeing that before then.

5 Q Did you -- did Dan O'Connor work on the  
6 Congressional map in any way with you?

7 A No.

8 Q Did Dan O'Connor see the map prior to it being  
9 enacted?

10 A No.

11 Q How about prior to it being made public?

12 A No.

13 Q Did you speak with Mr. O'Connor about the map  
14 prior to it being made public?

15 A No.

16 Q Outside of your office, did you speak with  
17 anyone about the Congressional map?

18 A Yes.

19 Q Who?

20 A Chairmans Kennedy and Chairman Rich, Bryan  
21 Tyson, and there may have been others. I don't recall  
22 right now.

23 Q Okay. If you don't mind, we're going to walk  
24 through these.

25 So you said that you spoke with Chairman



1 Kennedy about the Congressional map?

2 A Yes.

3 Q And this was before it was made public?

4 A Yes.

5 Q Do you recall when you spoke with him?

6 A I'm sure numerous times.

7 Q Approximately how many times?

8 A I couldn't say. I don't know.

9 Q Do you remember the time period?

10 A During the time we worked on the map, after the  
11 Census data was out, before the maps were made public.

12 Q Did you ever show him draft maps?

13 A Yes.

14 Q Were you in the room together when you showed  
15 him draft maps?

16 A Yes.

17 Q Did he see draft maps on a screen?

18 A Yes.

19 Q When you showed him the draft maps, did you  
20 have the ability to make changes to the lines?

21 A Yes.

22 Q Did he ask you to make changes?

23 A I don't recall specifically.

24 Q In general, did he ever ask you to make changes  
25 to the lines, not necessarily when you were together?



1           A    Yes.  We worked on, you know, how to create the  
2   map, how to lay the map out, so yes.  Maybe not in that  
3   particular wording.

4           Q    Sure.  When you say "worked on," can you  
5   describe for me a little bit more what you mean by that.

6           A    Discussed the shapes of the districts, where  
7   they were, how the map -- how they wanted the map to  
8   appear.

9           Q    When you say "how they wanted the map to  
10  appear," who is the "they" that you are referring to?

11          A    Both chairs of the committee, the House and the  
12  Senate, leadership, whoever was giving input into how  
13  they wanted to draw that map.

14          Q    Did Chairman Kennedy ever tell you who was  
15  providing the input to him about how they wanted the map  
16  to be drawn?

17          A    I don't know that he told me who he talked  
18  with, no.

19          Q    So -- and I know you've mentioned other people,  
20  but just to Chairman Kennedy --

21          A    Uh-huh.

22          Q    -- is it -- is it my understanding that you are  
23  saying he provided you with direction on how to draw the  
24  map, and you don't know where his direction came from?

25          A    Correct.  He could have had multiple



1 conversations that then came to me through him. I don't  
2 know to what extent or to whom he had conversations with.

3 Q Did you ever ask?

4 A No.

5 Q Did he ever offer information like that?

6 A I don't recall.

7 Q But he did provide you direction on how to draw  
8 the map?

9 A Yes.

10 Q Did you make changes to the lines in the  
11 Congressional map based off of his direction?

12 A I'm sure at some point I did.

13 Q Can you recall some points when he did?

14 A Not specifically.

15 Q Is that because you can't recall a specific  
16 change you made or you can't recall a specific direction  
17 that he provided to you?

18 A Can you say that again, please?

19 Q Sure. Can you recall specific directions that  
20 Chairman Kennedy provided you about changes to the map,  
21 the Congressional map?

22 A We had numerous conversations during that time  
23 period, so I don't recall a specific instruction of how  
24 to do a specific thing on the map, between he and I, no.

25 Q Do you recall making specific changes to the



1 map based off some type of instruction from Chairman  
2 Kennedy?

3 A Specifically, no, but the map did take -- there  
4 were multiple draft versions, I'm sure you've seen, that  
5 were provided during the discovery. So at some point  
6 there was feedback from both chairmen on how to make  
7 adjustments or to try different things. Specifically, I  
8 don't recall what those were or when they said that or  
9 what they said, but with multiple drafts, there was  
10 definitely input from them on making adjustments.

11 Q You've been talking about Chairman Kennedy.

12 A Uh-huh.

13 Q Would your answer be the same with Chairman  
14 Rich?

15 A Yes.

16 Q Was your relationship with regard to Chairman  
17 Rich in the development of the Congressional map any  
18 different than your relationship with regard to Chairman  
19 Kennedy?

20 A No.

21 Q Did you ever meet with both chairmen together?

22 A I think I did, at least once.

23 Q By that, do you -- does that mean that you  
24 mostly met with them separately?

25 A It's hard for me to recall. We met so many



1 times during that time period, so specifically to recall  
2 a certain meeting that I had with either of them or  
3 together, it's very hard for me --

4 Q Sure.

5 A -- to recall specifics on that.

6 Q Sure. "So many times," can you give me a  
7 ballpark of what that means?

8 A I don't know.

9 Q Would it be -- well, how about this -- 100  
10 times?

11 A No, probably not 100 times.

12 Q 50 times?

13 A Maybe.

14 Q Okay.

15 A But that would include conversations other than  
16 meeting in person as well.

17 Q How else would you converse other than meeting  
18 in person?

19 A Perhaps on the phone.

20 Q Ever over Zoom?

21 A Yes.

22 Q Did you ever show a map over Zoom?

23 A Yes.

24 Q The video was on when you were on Zoom?

25 A What do you mean the video was on?



1 Q Sometimes you can be on Zoom but the video is  
2 off so you can't see the other person.

3 A Yes, I think the video was on.

4 Q Okay, yeah.

5 Did you discuss prior maps -- I'll back up.  
6 Excuse me.

7 On the LCRO website there is a September 27th  
8 Duncan-Kennedy Congressional map, as well as the enacted  
9 map, right?

10 A Correct.

11 (Court reporter clarification.)

12 Q BY MR. CANTER: Did you discuss the  
13 Duncan-Kennedy map with the chairman as well?

14 A Yes.

15 Q And you also discovered the ultimately enacted  
16 map?

17 A Yes.

18 Q And did you discuss drafts between the  
19 Duncan-Kennedy map and the enacted map?

20 A I'm sorry, can you say that again, please?

21 Q Sure.

22 Did you discuss different drafts of the map  
23 between the Duncan-Kennedy map and the enacted map?

24 A I believe so, probably.

25 Q And these discussions were sometimes in person,



1 sometimes over Zoom, and sometimes over telephone?

2 A Yes.

3 Q Any other ways you communicated?

4 A I don't think so.

5 Q Did you ever speak with anyone on Chairman  
6 Kennedy's staff?

7 A Yes.

8 Q Whom?

9 A Are you -- in specific or just ever spoke to?  
10 Because yes, I spoke with Ali Farmer.

11 Q That's --

12 A But not related to the content of the map.

13 Q That's fair. Thank you. I will rephrase the  
14 question.

15 A Okay.

16 Q In relation to the content of the Congressional  
17 map, did you ever speak with someone in Chairman  
18 Kennedy's staff?

19 A I received an e-mail from someone on his staff.  
20 I can't recall her name because I didn't speak with her  
21 much related to the map you referred to a moment ago, the  
22 first proposed Congressional map.

23 Q But mostly you were speaking with Chairman  
24 Kennedy?

25 A Correct.



1 Q The vast majority?

2 A The vast majority.

3 Q The same question about Chairman Rich. Did you  
4 speak with anyone on Chairman Rich's staff about  
5 developing the Congressional map?

6 A No.

7 Q You only spoke with Chairman Rich?

8 A Correct.

9 Q Did Chairman Kennedy and Chairman Rich provide  
10 final approval on the maps before they were made --  
11 sorry.

12 Did Chairman Kennedy and Chairman Rich provide  
13 final approval on the Congressional map before that one  
14 was made public?

15 A When you say "final approval," what do you  
16 mean?

17 Q Right before it was made public.

18 A But what kind of -- what do you mean by "final  
19 approval?" Just saying okay or something beyond that?

20 Q At this point just meaning they accepted it,  
21 and you needed their acceptance before it was made  
22 public?

23 A Yes.

24 Q Do you remember when that was?

25 A I don't remember the specific date.



1           Q    Do you remember if that -- I'm going to call it  
2   final approval, but I hope you understand what I mean  
3   there. Do you remember if that final approval was in  
4   person or in some other -- over some other means?

5           A    I don't recall specifically when that was  
6   given.

7           Q    Did you ever e-mail with Chairman Kennedy about  
8   the Congressional map?

9           A    It's possible that I did. I don't recall  
10   anything specific.

11          Q    Primarily you were conversing in the ways we  
12   talked about before?

13          A    Yes.

14          Q    Is it the same with Chairman Rich?

15          A    Yes.

16          Q    E-mail is pretty common. Why didn't you  
17   e-mail?

18          A    I just prefer to discuss things in person with  
19   him.

20          Q    Can you elaborate on why you prefer that?

21          A    Well, I also know that you don't want to e-mail  
22   a lot of documents and have things in e-mail as well. So  
23   it's much --

24          Q    And why --

25          A    -- easier.



1 Q I'm sorry.

2 A You create along a record when you do that, so  
3 it's much better to have that conversation in person.

4 Q I understand.

5 Approximately when did you first begin speaking  
6 with Chairman Kennedy and Chairman Rich about the  
7 Congressional map?

8 A Which Congressional map? The final version?

9 Q The final Congressional map.

10 A I'm not sure of the date that we began talking  
11 about that.

12 Q How about, when did you first begin speaking  
13 with Chairman Kennedy and Chairman Rich about any draft  
14 of the Congressional map?

15 A Chairman Kennedy and I spoke, I think it was  
16 in -- Chairman Kennedy and I spoke, I believe in  
17 September at some point, regarding the initial  
18 Congressional District map draft that was the one that  
19 you referred to on our website. I don't recall  
20 specifically when a Congressional map discussion came up.  
21 The initial focus was to start with the -- the House and  
22 Senate, so --

23 Q Yeah.

24 A -- I don't recall when in that process we began  
25 to talk about congressional.



1 Q We will get to the House and Senate  
2 momentarily.

3 A Yeah.

4 (Court reporter clarification.)

5 Q BY MR. CANTER: You said a moment ago that you  
6 spoke with Chairman Kennedy about the September map at  
7 some point in September.

8 A Uh-huh.

9 Q Did he draw the September map?

10 A No.

11 Q Why is it called the Duncan-Kennedy map? Does  
12 the "Kennedy" refer to Chairman Kennedy?

13 A Yes.

14 Q Then why is it called the Kennedy map?

15 A I didn't call it that. It has a plan name, so  
16 I don't know who calls it that.

17 Q Got it.

18 A I think they released a press release, so that  
19 may be why they started calling it that way. I'm not  
20 sure why --

21 Q Okay. Fair enough.

22 A -- they refer to that. But maps that are from  
23 our office have to have legislative sponsorship, so they  
24 do have to come through a member of the General Assembly  
25 in order to draw one, so...



1 Q Sure. Okay. That makes sense.

2 Did Chairman Kennedy have any opinions about  
3 the September map?

4 A Opinions in what way?

5 Q About the composition of the districts in the  
6 September map.

7 A Before its creation or after?

8 Q Before its creation.

9 A Yes.

10 Q Do you remember those?

11 A Not well enough to tell you what they were, but  
12 did he have them, yes.

13 Q Do you think that if we look at documents for  
14 specific districts later, you would be able to recall  
15 some of them?

16 A Possibly, because I know there was a document.  
17 Like I said, the staff person e-mailed me related to  
18 that.

19 Q Just so I understand, a staff member on -- one  
20 of Chairman Kennedy's staff members e-mailed you about an  
21 early draft of the Congressional map?

22 A Yes.

23 Q And maybe looking at that document would  
24 refresh your recollection on what he --

25 A Yes.



1 Q The same with Chairman Rich. Did you speak  
2 with Chairman Rich about the early drafts of the  
3 Congressional map?

4 A Are you referring to the --

5 Q September version.

6 A No, I did not.

7 Q Did you speak with Chairman Rich about any  
8 other drafts of the Congressional map?

9 A The versions that came later on, yes.

10 Q And did she have opinions about them?

11 A I'm sure that she did. I don't recall what  
12 they were.

13 Q Do you think looking at documents for specific  
14 districts would help refresh your recollection?

15 A Possibly so.

16 Q You mentioned that you also spoke with  
17 Mr. Tyson about the Congressional map --

18 A Yes.

19 Q -- is that correct?

20 What did you guys discuss?

21 MR. JAUGSTETTER: I'm going to assert an  
22 objection. Mr. Tyson served as counsel to Ms. Wright,  
23 and I am -- I'm going to instruct her that she can answer  
24 as to topics but not the substance of those  
25 conversations.



1 THE WITNESS: Can you repeat that?

2 Q BY MR. CANTER: Yeah. What did you and  
3 Mr. Tyson discuss about the Congressional map, keeping in  
4 mind your counsel's instruction?

5 A I don't recall specific conversations with the  
6 content of those conversations, but he did advise from a  
7 legal capacity on the composition of the map, what would  
8 be in it.

9 Q When did these conversations occur?

10 A During the same time period as all of this.

11 Q Did you ever speak with Mr. Tyson while also  
12 speaking with Chairman Kennedy?

13 A In a group meeting, yes.

14 Q How about, did you ever speak with Mr. Tyson  
15 while also speaking with Chairman Rich?

16 A Yes.

17 Q Did you ever speak with all four of them at the  
18 same time?

19 A Yes.

20 Q In person?

21 A All three of them? Four?

22 Q Well, four including you. You're right. That  
23 was a little funny there.

24 A I was wondering who else was there.

25 Q Yeah, that's right. I apologize.



1           Let me rephrase. Did you ever speak with the  
2 three of them at the same time?

3           A Yes.

4           Q And were those conversations ever in person?

5           A I can't say specifically. Possibly so. There  
6 was a lot of in and out and meetings in the office, so  
7 it's possible that there was one in person.

8           Q Were you looking at maps when you were speaking  
9 together?

10          A Yes.

11          Q And that's all of those that --

12          A Pretty much what I do.

13          Q All right. Yeah.

14                Is there anyone else that -- let me back up.  
15 You said you drew the Congressional map?

16          A Yes.

17          Q And you drew it with Maptitude?

18          A Yes.

19          Q And you've mentioned speaking with Chairmans  
20 Kennedy and Rich and Mr. Tyson about drawing the  
21 Congressional map?

22          A Yes.

23          Q Is there anyone else that you spoke with?

24          A So in terms of the group meeting-type thing,  
25 there was a meeting that involved the Speaker of the



1 House at the time, Speaker Ralston, and Lieutenant  
2 Governor Duncan, and some of their staff.

3 Q Including group conversations, is there anyone  
4 else that you spoke with about the Congressional map in  
5 addition to Speaker Ralston, Lieutenant Governor Duncan,  
6 and their respective staff?

7 A With a specific memory of having that  
8 conversation, no, I don't clearly recall having a  
9 conversation. That's not to say -- there were a lot of  
10 conversations happening, so...

11 Q Were there any -- let me know if this question  
12 doesn't make sense, but were there any persons that were  
13 representing an organization or an entity that you spoke  
14 with? So maybe you weren't speaking with them in their  
15 personal capacity, but you were speaking with an entity  
16 and they were speaking on the entity's behalf.

17 So if I was speaking with you on behalf of the  
18 law firm I work at, is it possible -- and you maybe  
19 weren't considering you were talking to me in my  
20 individual capacity, but you were talking to me in my  
21 sort of capacity representing the entity.

22 A Are you talking about in the formation of that  
23 map specifically?

24 Q Regarding the formation of the Congressional  
25 map.



1           A    No. We would typically defer someone to a  
2 legislator to do that if they wanted to bring something  
3 to us regarding drawing a map.

4           Q    So just to be clear, you never spoke with  
5 anyone in that sort of representative capacity?

6           A    I don't recall that.

7           Q    Anyone in your office?

8           A    I couldn't speak to that. I don't recall that  
9 they did either. They know that most map drawing that we  
10 do comes through a member. We might provide information  
11 to some of their staff. I know we did provide  
12 information to some of the Democratic Caucus staff  
13 members from time to time. But as far as going into the  
14 formation of that map, I don't recall any conversations  
15 with staff members.

16                   (Court reporter clarification.)

17           Q    BY MR. CANTER: You mentioned speaking with  
18 Speaker Ralston about in relation to drawing the  
19 Congressional map?

20           A    Yes.

21           Q    Do you recall those discussions?

22           A    It was a group discussion, so it was a -- a  
23 Zoom call meeting.

24           Q    When did it occur?

25           A    I do not know the date.



1 Q In September?

2 A No.

3 Q In October?

4 A Possibly. October sounds -- maybe.

5 Q Late October?

6 A It had to be in that time window because it's a  
7 narrow time window, so maybe October.

8 Q Late October?

9 A I couldn't say specifically.

10 Q Do you recall if it was closer to when the  
11 September 27th map was made public or was it closer to  
12 when the ultimately enacted map was made public?

13 A I don't think it was close to the  
14 September time frame, but I don't know exactly the date.

15 Q Do you remember, what did you guys talk about?

16 A The Congressional map.

17 Q Who was at the meeting?

18 A The -- the names I gave you previously.

19 Q So just to be clear, you had a meeting with --  
20 about the Congressional map at some time closer to the  
21 enacted map's publication with Chairmans Kennedy, Rich,  
22 Mr. Tyson, Speaker Ralston, Lieutenant Governor Duncan,  
23 and staff of the Speaker and Lieutenant Governor?

24 A That's correct.

25 Q Do you remember how many staff?



1           A    No. I was in my office on a Zoom call and I  
2   was not in the actual room with them, so I don't know who  
3   all was in the room.

4           Q    Was everyone -- maybe you don't know this, but  
5   was everyone else in a single room and you were on the  
6   video?

7           A    I can't say that everyone. Most of them were  
8   in a single room. I don't recall there being someone  
9   else on the Zoom call, but...

10          Q    Was -- was a map projected when that was taking  
11   place?

12          A    Yes.

13          Q    Did you have the ability to change the map's  
14   composition when that occurred?

15          A    Yes.

16          Q    Did anyone on that call ask you to make changes  
17   to the lines at that time?

18          A    Yes. We worked on adjusting the map during  
19   that call.

20          Q    It was a working session?

21          A    Yes.

22          Q    And changes were made?

23          A    Yes.

24          Q    At the direction of Chairman Ralston?

25          A    Speaker Ralston?



1           Q    I apologize.  Excuse me.  At the direction of  
2   Speaker Ralston?

3           A    Yes.  I think there was a group discussion  
4   about things.  I don't know that it was a single person  
5   who said do this, but...

6           Q    Somebody on the other side of the Zoom --

7           A    Uh-huh.

8           Q    -- gave you an instruction about how the  
9   composition lines would look and you followed it?

10          A    Yes.  We would try different scenarios.

11          Q    I just want to understand what you are saying.  
12   So would it be fair to say that it was difficult to  
13   discern who was in charge of that instruction, but it was  
14   someone on the other side of the call?

15          A    It's not difficult to discern, but there was  
16   discussion happening.

17          Q    I see.

18          A    So as listening to the discussion, I would then  
19   attempt to try and create a sample of what it was that  
20   they were looking to see.

21          Q    So it was a collaborative process amongst the  
22   people on that Zoom call?

23          A    Yes.

24          Q    Are you aware of how the individuals on the  
25   Zoom call obtained -- you know, built their opinions



1 about how the map should look?

2 A Can you say that one more time?

3 Q Yeah. So the people on the other side of the  
4 Zoom call had opinions about how the Congressional map  
5 should look; is that right?

6 A Yeah. Yes.

7 Q Do you know how they developed those opinions?

8 A They did not tell me how they --

9 Q Okay.

10 A -- developed their opinions.

11 Q You just drew the map?

12 A Do the technical work, yes.

13 Q They instructed you on how to do it?

14 A Yes.

15 Q Was there a invitation for this Zoom call? You  
16 know how you -- I have Outlook, and sometimes I will get  
17 Outlook invi- -- Zoom Outlook invitations.

18 A I can't recall if there was one sent to me or  
19 if I created the meeting. I don't remember how that was  
20 set up.

21 Q But there is some invitation somewhere?

22 A I would -- yes, somewhere.

23 Q Okay. This might be a tough one, but do you  
24 remember what the meeting was called in the invitation?

25 A No, I do not.



1 Q That's fair. I get that.

2 And this meeting, was it just about the  
3 Congressional map?

4 A Yes.

5 Q Were there any other meetings like this working  
6 session?

7 A Where I was in a room and I was on a Zoom with  
8 other people, no, I don't think so.

9 Q Were there any other working sessions about how  
10 to draw the lines in the Congressional map?

11 A I don't recall a specific meeting. There were  
12 other meetings about drawing the Congressional map, not  
13 at the -- not in the same way this one was and not with  
14 the same people involved. Maybe smaller scale.

15 Q When you say there were other meetings about  
16 drawing the Congressional map, are you referring to the  
17 meetings that we talked about before with --

18 A Yes.

19 Q -- the chairmen?

20 A Yes, Chairman Rich, Chairman Kennedy.

21 Q Is this working session the only time you spoke  
22 with Speaker Ralston and Lieutenant Governor Duncan about  
23 the Congressional map?

24 A To my recollection, it is.

25 Q Is it possible there's another occasion?



1           A    I don't think so; not regarding the  
2 Congressional map.

3           Q    Sure.

4                   Director Wright, what was your role in drawing  
5 the State Senate map which Governor Kemp signed into law?

6           A    I drew that map.

7           Q    Did anyone in your office work on drawing the  
8 State Senate map with you?

9           A    No.

10          Q    Did Brian Knight help you draw the map?

11          A    No.

12          Q    Did you speak with Brian Knight about the map?

13          A    No.

14          Q    Sorry, let me make sure the question is clear.

15                   Did you speak with Brian Knight about drawing  
16 the State Senate map?

17          A    No.

18          Q    Are you aware of whether Mr. Knight had any  
19 communications that were ultimately conveyed to you about  
20 drawing the State Senate map?

21          A    Can you clarify what you mean?

22          Q    Mr. Knight talked to someone. He then talked  
23 to someone else. That ultimately -- that direction  
24 ultimately got to you?

25          A    No, I don't believe so.



1 Q Did you talk to Mr. Dan O'Connor about drawing  
2 the State Senate map?

3 A No.

4 Q Did he help you in any way with drawing the  
5 State Senate map?

6 A No.

7 Q Was he involved in any way in drawing the State  
8 Senate map?

9 A No.

10 Q The same question with Mr. Knight. Was he  
11 involved in any way with drawing the State Senate map?

12 A No.

13 Q How about Mr. Rob Strangia?

14 A No.

15 Q He wasn't involved in any way with drawing the  
16 State Senate map?

17 A No.

18 Q Mr. Strangia is the GIS specialist in your  
19 office?

20 A He is the GIS manager, yes.

21 Q And did you use Maptitude to draw the State  
22 Senate map?

23 A Yes.

24 Q So if he's the GIS manager -- does Maptitude  
25 use GIS technology?



1 A Yes.

2 Q So help me out how Mr. Strangia wasn't involved  
3 in drawing the State Senate map if the map was drawn with  
4 Maptitude and he's the GIS manager.

5 A So we could probably all have GIS  
6 qualifications if we were to do that, because it is all  
7 of us who use it. His role is more to oversee  
8 downloading software updates.

9 That was -- I don't know what that was.  
10 Something popped up.

11 Q Updates and then that sound comes on, yeah.

12 A Yeah.

13 He does a lot of the building some of the like  
14 layers that we use. He does work with the GIS program to  
15 build, say, the precinct layer and other things like  
16 that, but he doesn't actually draw maps at any time.

17 Q Are you drawing a distinction between using the  
18 data and the layers to draw the map and preparing the  
19 data and the layers for drawing the map?

20 A Yes.

21 Q And Mr. Strangia provided the latter for  
22 preparations?

23 A Yes. He works more on that end of -- of our  
24 office.

25 Q Did Mr. Knight help Mr. Strangia with that --



1 I'm going to call it the preliminary step of preparing  
2 the layers and data?

3 A No, I don't think so.

4 Q Did Mr. O'Connor?

5 A No.

6 Q If I were to ask about the Congressional map  
7 and -- sorry, I'm going to rephrase that.

8 Regarding the Congressional map, and keeping in  
9 mind this broader notion of preparation of the data and  
10 layers and also drawing, were Mr. Knight and Mr. O'Connor  
11 involved at all?

12 A Can you say that one more time? I sort of got  
13 lost.

14 Q Yeah, sure. Is it also the case that data and  
15 layers had to be prepared for drawing the Congressional  
16 map?

17 A We use the same layers for all of the maps we  
18 draw.

19 Q And Mr. Strangia did that work?

20 A He works on, yes, the GIS building, primarily  
21 of our precinct layer and other -- bringing in stuff from  
22 the software company, installing, and that kind of thing.

23 Q And that's relevant to the Congressional map?

24 A It's relevant to all the maps.

25 Q Did Mr. Knight and Mr. O'Connor help with that



1 step as well?

2 A No.

3 Q And that's the same for the State Senate map?

4 A Yes.

5 Q Did you -- what role did Mr. Tyson have in  
6 drawing the State Senate map?

7 A Mr. Tyson's role was as counsel for the  
8 redistricting process, so for all maps it would be the  
9 same consulting position.

10 Q You mentioned that you spoke with Chairman  
11 Kennedy and Rich and Mr. Tyson and Speaker Ralston and  
12 Lieutenant Governor Duncan and the staff about the  
13 Congressional map?

14 A Yes.

15 Q And there was no one else you spoke with about  
16 the Congressional map?

17 A Unless whoever staff was in that meeting.  
18 Specifically, I don't recall speaking with anyone else.

19 Q Is that the same group of people that you spoke  
20 with about the State Senate map?

21 A No.

22 Q Who did you speak with about the State Senate  
23 map?

24 A Well, the Senate would have been drawn by  
25 Chairman Kennedy, and that would be more specific to



1 people on the Senate side of drawing the map. So yes,  
2 Bryan Tyson. I'm quite sure Loree Anne Paradise was --  
3 was also acting as counsel during that time, too. At one  
4 point I believe Senator Gooch was in a meeting that I was  
5 in. And there may have been other senators. I don't  
6 recall specifically at this point.

7 Q Just to make sure I understand, you just said  
8 that you spoke with Chairman Kennedy?

9 A Uh-huh.

10 Q Mr. Tyson, Ms. Paradise, Senator Gooch, and  
11 maybe some other senators about drawing the State Senate  
12 map?

13 A There were a lot of legislators in and out of  
14 our office at that time, so there may have been other  
15 senators who came in to look at a part of the map or to  
16 offer up what they would like to see in the map.  
17 Specifically, I don't recall who that would have been at  
18 this point. I would have to --

19 Q Sure.

20 A I don't recall.

21 Q Sure. So the map was drawn in your office?

22 A Yes.

23 Q And senators would come into the office to look  
24 at the map?

25 A No. Senator Kennedy was involved in



1 determining when he wanted to discuss that map with other  
2 people, show that map to other people, work on it. It  
3 was not shown in the work process. I don't know that he  
4 gave that to everyone while it was being developed.

5 Q Did -- so Senator -- Chairman Kennedy did see  
6 the State Senate map while it was being developed?

7 A Yes.

8 Q But you are not sure whether Chairman Kennedy  
9 showed it to any other senators?

10 A I don't know what Chairman Kennedy did during  
11 that time. There were not -- I think he would have tried  
12 to come to our office. I don't think that there were  
13 copies that I know of that were given out, so I think  
14 that during the work process it would have been a -- he  
15 would have had to come to me, which is why I don't  
16 remember there being other folks.

17 Q You held onto the map in your office?

18 A Yes.

19 Q And you didn't publish it until it was --

20 A Until it was ready to be published.

21 Q Is that the same with the Congressional map?

22 A Yes.

23 Q And the same with the House map?

24 A Yes.

25 Q And you know that Chairman Kennedy saw the map



1 because you were there when he saw it?

2 A Yes.

3 Q But you didn't -- you are not aware of any  
4 other senators seeing the map?

5 A Like I said, I know that Senator Gooch came in  
6 for a meeting. I recall that one. I'm trying to think  
7 through all the different --

8 Q Yeah.

9 A -- interactions that I had. I think Senator  
10 Walker came in at one point. This was near the -- before  
11 they made the map public.

12 Q Are you drawing a distinction between coming  
13 into your office to discuss the map and coming into your  
14 office to see the map?

15 A Kind of both things happened at the same time.

16 Q Okay. So when Senator Gooch came into your  
17 office --

18 A Uh-huh.

19 Q -- did he see the map?

20 A Yes.

21 Q And you guys talked about it?

22 A Yes.

23 Q The same with Senator Walker?

24 A Yes.

25 Q And the same with potentially these other



1 senators --

2 A Right.

3 Q -- who came to your office?

4 A And then Senator Cowser, I think came at one  
5 point, too. I'm trying -- they are all --

6 Q Yeah.

7 A -- triggering memories.

8 Q Totally get it.

9 A Yeah.

10 Q And these senators came into your office after  
11 being provided permission from Senator Kennedy?

12 A Senator Kennedy would have been with them.

13 Q The senators only came into your office to look  
14 at the maps if Chairman Kennedy was there as well?

15 A If he was there or had given permission, yes.  
16 I would not have shown that -- we don't show any map that  
17 a legislator draws without explicit permission from them  
18 or them being present to show that to whoever they  
19 choose. That's with any kind of map.

20 Q And who is the "them" you are referring to  
21 here?

22 A Back me up.

23 Q Yeah, yeah. So you said -- I understand you  
24 said that you don't show maps to any particular  
25 senators --



1 A Right.

2 Q -- unless they give you permission to show maps  
3 to those particular senators?

4 A Right. A map would have an author. A map  
5 would have -- it would be their -- their map. So if --  
6 to contrast that, when Aleda Butler submitted a map to  
7 our office and we worked with her on fine-tuning that, we  
8 didn't show that to any other senators unless she had  
9 said, you may show this to Senator Parent or some other  
10 senator.

11 We wouldn't do that with any map that any  
12 member works on, unless they either give explicit  
13 permission to do that or they're there with us and say,  
14 show them this map.

15 Q Got it. Thank you. That's helpful.

16 And when senators were looking at the map, was  
17 that in your office?

18 A Yes.

19 Q On a computer screen?

20 A Yes.

21 Q And did you have the ability to change map  
22 lines when you were doing that?

23 A Yes.

24 Q Did you ever change map lines when you were  
25 doing that?



1 A Yes.

2 Q With regards to the Senate map, how many times  
3 did you meet with Chairman Kennedy?

4 A I do not know.

5 Q Over 20?

6 A I don't know.

7 Q Over a hundred?

8 A I don't think it was over a hundred, but a  
9 significant number.

10 Q Around 50?

11 A I can't say specifically.

12 Q Okay. But we're pretty sure between 20 and a  
13 hundred?

14 A It was a lot.

15 Q Okay. Do you remember when you met with him?

16 A During the time period we were drawing these  
17 maps.

18 Q When was the earliest occasion that you met  
19 with Chairman Kennedy about the State Senate map?

20 A I could not -- I don't know.

21 Q August?

22 A We didn't have data until August the 12th, so  
23 any preliminary discussion before that would have been  
24 not helpful because we wouldn't know where the population  
25 growth, what the map is gonna look like, where -- where



1 we needed to make adjustments.

2 So it would be after we got Census data. I am  
3 sure I had spoken with him before that, of course, as our  
4 chairman; but regarding the map specifically, we would  
5 have had to have Census data to discuss the map.

6 Q When was the latest date that you spoke with  
7 Chairman Kennedy about the Senate map that was ultimately  
8 enacted by Governor Kemp?

9 (Court reporter clarification.)

10 THE WITNESS: I don't remember a specific date.

11 Q BY MR. CANTER: Was it pretty close to the date  
12 that the map was published?

13 A I spoke with both chairmen so frequently during  
14 that time period, I can't say for sure.

15 Q Almost every day?

16 A A good bit.

17 Q Yeah, yeah.

18 When you were speaking with Chairman Kennedy  
19 about the State Senate map, was it also mostly over in  
20 person, phone or Zoom?

21 A Yes.

22 Q Any other ways?

23 A No.

24 Q Did you ever e-mail with him?

25 A I may have e-mailed him something at some



1 point, but I don't recall a specific e-mail with him.

2 Q The same reasons why you didn't really e-mail  
3 the Congressional map?

4 A Yes.

5 Q Okay. Do you -- did -- I think you told me  
6 that Chairman Kennedy provided you with specific  
7 instructions about how the lines of the map should be  
8 drawn?

9 A Say that one more time. I'm sorry.

10 Q Sure.

11 Did Chairman Kennedy provide you with specific  
12 instructions about how the lines of the State Senate map  
13 should be drawn?

14 A No.

15 Q Did you receive any specific instructions about  
16 how the lines of the State Senate map should be drawn?

17 A Initially, no.

18 Q How did you make a determination about how to  
19 draw the lines for the State Senate map?

20 A That was a -- basically a -- call it a blind  
21 map, but it was a map, just a starting point map to  
22 address the population changes in the state and make  
23 adjustments to the districts as they were, to try and  
24 have a starting point, a discussion map to -- to start  
25 with.



1 Q So just so I understand, population data  
2 becomes available via the Census?

3 A Uh-huh.

4 Q You look at the population data?

5 A Uh-huh.

6 Q And then you create a blind map?

7 A Uh-huh.

8 Q Do you remember when you created the blind map?

9 A I do not.

10 Q August or September?

11 A It may have been October.

12 Q Okay.

13 A I'm not sure.

14 Q That's kind of late.

15 A It is.

16 Q Do you know why it was so late?

17 A I don't.

18 Q Were you instructed not to work on the map  
19 until October?

20 A I was not instructed.

21 Q You were not instructed to work on the map?

22 A I was not given any instruction at that point.

23 Q I see.

24 A I'm not heard.

25 Q You only work on maps when people tell you to



1 work on maps?

2 A Correct. We work for the legislature, so we do  
3 these things at their request.

4 Q Is the LCRO part of the legislature?

5 A We are a joint office of the General Assembly,  
6 so we serve the House and the Senate as the staff office.

7 Sorry. I will slow down.

8 Q And the LCRO only draws maps when instructed to  
9 do so by a member of the General Assembly?

10 A Correct, a member or at the sponsorship of a  
11 member if it's something for a -- a local jurisdiction or  
12 something.

13 Q And you received no instruction to draw a State  
14 Senate map until maybe even October?

15 A Correct.

16 Q Do you know why?

17 A I do not.

18 Q Who was the person that ultimately instructed  
19 you to start drawing the State Senate map?

20 A It would have been Chairman Kennedy.

21 Q Was it in person?

22 A I don't recall.

23 Q If I'm understanding you, you started the  
24 Congressional map before starting the State Senate map?

25 A I drew the initial Congressional map you



1 referred to earlier, the --

2 Q Duncan-Kennedy?

3 A That was drawn, yes, before the House or Senate  
4 draft was drawn.

5 Q Was the first draft of the House map also drawn  
6 around the same time as the first draft of the Senate  
7 map?

8 A Yes.

9 Q So you are instructed to draw a Senate map  
10 sometime around October, and was your instruction to draw  
11 a -- what you called blind map?

12 A Yes, it was a -- basically, to use the  
13 population data and draw a balanced map that would  
14 balance the population in the district so they would have  
15 a place to start with discussion.

16 Q Were you instructed to comply with any  
17 guidelines or principles when drawing the blind map?

18 A Yes.

19 Q What were they?

20 A The committee guidelines that they had for both  
21 committees spelled out the specifics of what the  
22 committee would use, so those were the things taken into  
23 account.

24 Q Did you take them into account?

25 A Yes.



1 Q Why did Chairman Kennedy want a blind map to  
2 start off with?

3 A It's a place to begin looking at the changes in  
4 the map. Where districts have grown, you need to lose  
5 population and then figure out from there what -- what  
6 would be places to reflect the changes that were  
7 necessary, where -- where did -- for instance, in south  
8 Georgia there was a loss in population, so there was a  
9 notion that there was going to be a district from south  
10 Georgia that would not be there; we'd have to move it.  
11 So taking something like that to visually show what that  
12 would look like.

13 Q Do you believe that your blind map complied  
14 with the guidelines and the principles that we were just  
15 talking about?

16 A Yes, but we do submit any of those things to  
17 the counsel that was reviewing that for legal analysis,  
18 the maps that were considered.

19 Q Just you did submit the blind map to legal  
20 counsel for analysis?

21 A Yes. They had access to view it.

22 Q Did -- I might get an instruction here. Did  
23 counsel direct you -- inform you whether the blind map  
24 complied with the Voting Rights Act in the U.S.  
25 Constitution?



1 MR. JAUGSTETTER: I'm going to object on the  
2 basis of attorney-client privilege and instruct the  
3 witness not to answer that question.

4 Q BY MR. CANTER: But you did complete an  
5 analysis of whether the blind map complied with  
6 guidelines, and I'll call them traditional districting  
7 principles?

8 A When you say "complete an analysis," what do  
9 you mean by that?

10 Q When you were drawing the blind map, did you  
11 keep the guidelines and traditional districting  
12 principles in mind?

13 A Yes.

14 Q Do you believe that your blind map effectively  
15 balances changes in population, the guidelines, and the  
16 traditional districting principles?

17 A Yes.

18 Q Was the blind map ever made public?

19 A No.

20 Q The blind map was a starting point?

21 A Yes.

22 Q And then Chairman Kennedy saw it, and what --  
23 and you said that he didn't direct you to make changes to  
24 it?

25 A I don't know that I said that.



1 Q Maybe I misunderstood you.

2 So you made the blind map to start, and then  
3 you showed it to Chairman Kennedy?

4 A Uh-huh.

5 Q And what happened?

6 A I'm not sure who he discussed that map with,  
7 but as there were things to change in the map based on  
8 his conversations, then we would look at making  
9 adjustments to particular areas someone, you know,  
10 represented or wanted to continue to represent things to  
11 try and input into the map at that point.

12 Q Did Chairman Kennedy receive a copy of the  
13 blind map that -- you know, over e-mail or something?  
14 I'm trying to get at how he might have talked about the  
15 blind map with others but in specific ways without you  
16 being in the room.

17 A I don't recall printing anything or creating  
18 any PDFs of it. He may have just -- there I don't  
19 recall. He may have looked at it, known which -- who to  
20 talk to and -- I don't know.

21 Q Did he take notes about the blind map?

22 A I don't recall.

23 Q Do you recall if any of his staff took notes  
24 about the blind map?

25 A I don't recall his staff ever being in the



1 room.

2 Q You only recall Chairman Kennedy ever seeing  
3 the blind map?

4 A I think it's possible Bryan Tyson saw the blind  
5 map.

6 Q In his role as counsel?

7 A Yes.

8 Q In any other role?

9 A That was his role.

10 Q Okay. But Mr. Tyson had no other role with  
11 regards to drawing any of the maps?

12 A I'm not sure what you mean. He was serving as  
13 counsel.

14 Q People can serve as counsel and also do things,  
15 have opinions that aren't relevant to their service as  
16 counsel.

17 A To my knowledge, his role was as counsel, so  
18 that's what he served as.

19 Q I understand that that was his role, but did he  
20 take any action that wasn't related to his role and  
21 service as counsel?

22 A Not that I know of.

23 Q What kind of actions did Mr. Tyson take?

24 A You can ask him what kind of actions he took.

25 MR. JAUGSTETTER: I'm gonna -- I'm gonna assert



1 an objection based on attorney-client privilege.

2 MR. CANTER: Okay.

3 MR. JAUGSTETTER: And I know it's a -- I'm not  
4 really sure of the question you are asking, but I will  
5 instruct the witness not to disclose the contents of any  
6 discussions you had with Mr. Tyson relating to the maps.

7 But if it's possible for her to answer  
8 otherwise, she is free to.

9 Q BY MR. CANTER: Who did Mr. Tyson represent in  
10 relation to being counsel in the drawing of the maps?

11 A I was not involved in his hiring or what his  
12 contract looked like, so as far as my understanding was,  
13 it was he was counsel specific to redistricting for the  
14 General Assembly.

15 Q Who told you that?

16 A The chairman.

17 Q Chairman Kennedy?

18 A Yes.

19 Q Did Chairman Rich tell you that?

20 A I don't recall having a conversation with her  
21 at that point.

22 Q But Mr. Tyson also was part of the process for  
23 drawing the House Bill?

24 A He served as counsel in all -- for all three.

25 Q For all three. But Chairman Kennedy instructed



1 you about Mr. Tyson's role?

2 A I believe so.

3 Q So Mr. Kennedy -- pardon me. Chairman Kennedy  
4 sees the blind map, and then what happens? Does he  
5 direct you to make changes to it?

6 A That being a starting point map, then yes, we  
7 began to work within it to make adjustments for whatever  
8 requests people wanted to try and modify the map, however  
9 he wanted to try to best accommodate requests and things  
10 that were brought to him.

11 Q And you had a lot of conversations with him?

12 A Yes.

13 Q A lot of conversations about modifying the  
14 blind map?

15 A We did have conversations about modifying it,  
16 yes.

17 Q Were those conversations ever in person?

18 A Yes.

19 Q Were they mostly in person?

20 A Yes.

21 Q When you had those conversations, was the map  
22 projected onto a screen?

23 A Not necessarily.

24 Q But sometimes?

25 A Sometimes.



1 Q When you had the conversations when the map was  
2 projected onto the screen, was it within Maptitude?

3 A If I'm looking at the map, it would have been  
4 in Maptitude.

5 Q Okay. And you know how to use Maptitude?

6 A Yes.

7 Q Was data projected onto the screen?

8 A Sometimes it may have been. Not all the time.

9 Q Why would you look at a map without any data  
10 related to it?

11 A You are just reviewing the geography. You  
12 wouldn't necessarily be looking at the data. You are  
13 looking at the composition of districts, the counties,  
14 precincts and things.

15 Q When data was projected onto the screen, what  
16 type of data was it?

17 A Typically, our data would include the total  
18 population, the deviation, the percent deviation, voting  
19 age population. Most of the fields that you see on our  
20 population summary reports would be also included on  
21 there, as well as political data.

22 Q I recall that there's data related to the race  
23 of the population on those summary reports.

24 A Correct.

25 Q Was data related to the race of the populations



1 projected onto the screen?

2 A It could have been sometimes.

3 Q Most of the time?

4 A Most of the time. We usually projected all the  
5 race data that we would use on the reports, as well as  
6 the political data that they were reviewing. So both  
7 together.

8 Q Was that data relevant to you making -- I'll  
9 rephrase.

10 Did Chairman Kennedy consider that data when  
11 making instructions about how to draw the lines?

12 A I would assume he did. I don't know what  
13 Chairman Kennedy considered.

14 Q Was it sort of a collaborative conversation or  
15 was it really just Chairman Kennedy giving you  
16 instructions and you following them?

17 A Can you explain what you mean by that?

18 Q Yeah. I can imagine that Chairman Kennedy told  
19 you you need to move this line in southeast Georgia and  
20 then you did it. Or Chairman Kennedy could say, what  
21 would happen if I moved -- you moved this line in  
22 southeast Georgia? You could say, well, Chairman, this  
23 or that.

24 A I'd say it's more like the second scenario.

25 Q Okay. What type of questions did he ask you?



1 A I don't specifically recall.

2 Q Generally, what type of questions?

3 A Like what you said, what if we moved this here  
4 or if this particular senator has -- you know, has a  
5 long-standing relationship with this county and would  
6 like to maintain that in their district, could we put  
7 that back, and if we do that, what would we -- how would  
8 we accommodate. Those types of things.

9 Q Do you recall if he ever asked questions about  
10 how changes in the lines would affect the racial  
11 composition of members of the districts?

12 A I don't recall specific conversations about  
13 that, but again, he would have taken that to counsel if  
14 he had discussions about whether or not what the  
15 percentage of those in the districts were.

16 Q When other senators came to speak about the  
17 blind map --

18 A Uh-huh.

19 Q -- would they see the blind map projected onto  
20 a screen, too?

21 A Yes.

22 Q But sometimes there had already been changes  
23 made?

24 A I can't say. The process is fluid.

25 Q Sure. At what point was there a determination



1 that the blind map was complete and ready for  
2 publication?

3 A I don't recall a specific date.

4 Q Yeah. You know what, and that was not -- that  
5 was not properly stated.

6 You were making changes to the blind map?

7 A Right. The initial draft, yes.

8 Q When did you stop making changes to the initial  
9 draft?

10 A When they determined that the map was where  
11 they wanted it to be to go forward. I don't remember the  
12 date.

13 Q And was the completion of that map the first  
14 map -- first Senate map published on your website?

15 A Yes.

16 Q So it wasn't the ultimately -- that map wasn't  
17 the ultimately enacted map?

18 A Correct. There was a draft that came out.  
19 Then they made some additional adjustments, and then the  
20 final version came out, I believe.

21 Q Did you make the changes and the adjustments?

22 A Yes.

23 Q When those changes and adjustments were made,  
24 was it also at the -- you know, at the direction of the  
25 same people we're talking about right now, Chairman



1 Kennedy, Mr. Tyson and Ms. Paradise and other senators?

2 A The changes, I think, came at the request of  
3 the senator, and then Chairman Kennedy authorized to try  
4 and see if we could do what he had requested.

5 Q At the request of the senator, what senator are  
6 you referring to?

7 A Senator Rhett.

8 Q So there was the map that was published first?

9 A Uh-huh.

10 Q And then Senator Rhett requested changes?

11 A Uh-huh.

12 Q And as a consequence of that, you made changes?

13 A Yes.

14 Q And then another map was published?

15 A Yes.

16 Q Were there any other changes requested?

17 A I cannot recall. That one stands out. I  
18 remember doing that one. I don't recall if there were  
19 others in that draft.

20 Q Why does it stand out?

21 A I have drawn a lot of maps, so...

22 Q Yeah. So why does that one stand out?

23 A Because in committee, I remember there was  
24 discussion over the change, that that was in the  
25 committee meeting, so that one sticks out. That may have



1     been the only one that went into that final version  
2     because other -- other changes might have gone into the  
3     other version, the first presented version before we got  
4     to that, but there were members, you know, putting  
5     changes in.

6             That one just jumps out at me. That may have  
7     been the only one that went into that last version.

8             Q     Did you speak with anyone else in addition to  
9     the people you referred to for any reason about the State  
10    Senate map?

11            A     I probably spoke with a lot of senators  
12    regarding that map.

13            Q     Right. Right. Okay.

14            A     So I don't want to list all 56 of the  
15    members --

16            Q     Yeah.

17            A     -- that were here then, but I spoke with a lot  
18    of members at that point, from the time -- especially  
19    when the map was made public, those that requested  
20    things.

21            Q     Did you speak with anyone in the House about  
22    drawing the State Senate map?

23            A     I don't think so.

24            Q     Did you speak with anyone outside of the  
25    General Assembly about drawing the State Senate map?



1           A    Other than counsel that -- I don't know if you  
2   consider that part of the General Assembly or not.  I  
3   don't recall.

4           Q    You don't recall or you didn't?

5           A    I don't believe that I did.

6           Q    Okay.  And that includes not speaking with  
7   anyone that's representing an organization or an entity?

8           A    Right.

9           Q    Yeah.  I'm just trying to draw a distinction  
10   between speaking with persons and I spoke with this  
11   group.

12          A    Well, we do get a lot of requests for  
13   information, so it's -- it's kind of hard to say.  As far  
14   as what we were working on in the map during the process  
15   of drawing the map is a little different, because that  
16   was all after the public hearings, so we had already  
17   taken feedback through the public hearings.  The comment  
18   portal was available during that time.  So there was  
19   information that was there.  I wouldn't have time to  
20   spend a lot of time reading them, but I did do it  
21   sometimes, and so you're trying to incorporate a lot of  
22   input.  So I didn't speak with those people but heard  
23   from a lot of groups and people.

24          Q    You got a lot of input on what the  
25   Congressional State Senate and State House maps should



1 look like?

2 A There was a lot of input everywhere.

3 Q And it was hard to look at all of it?

4 A Yes.

5 Q Right. You weren't able to look at all of it?

6 A I looked at a lot of it but not all of it.

7 Q Yeah. There was a lot you didn't look at?

8 A I don't know that I'd say there was a lot I  
9 didn't look at.

10 Q Okay.

11 A But I did watch or attend every public hearing.

12 Q Okay. We have just been talking about the  
13 State Senate map, and you described a blind -- I'm going  
14 to call it a blind map process. Does that make sense if  
15 I said it that way?

16 A Sure.

17 Q Yeah. I should back up. What was your role in  
18 drawing the State House map which Governor Kemp signed  
19 into law?

20 A It was the same as the House, or as the Senate  
21 and Congressional.

22 Q Okay. And did you use the same blind map  
23 process to draw the State House map?

24 A Yes.

25 Q Was Brian Knight involved at all in drawing the



1 State House map?

2 A He did meet with some members, yes.

3 Q Was Mr. O'Connor involved at all in drawing the  
4 State House map?

5 A No.

6 Q Did you ever communicate with him about drawing  
7 the State House map?

8 A No.

9 Q Did he ever reflect any opinions to you about  
10 drawing the State House map?

11 A No.

12 Q Are you aware of him ever talking to anyone  
13 about the State House map?

14 A I'm sure he talked to people after it was made  
15 public, but...

16 Q How about before it was made public?

17 A No.

18 Q I understand that Mr. Strangia was involved in  
19 the preparation of the data and the layers for the State  
20 House map.

21 A For all of them.

22 Q Right. Was he involved in the drawing of the  
23 State House map at all?

24 A No.

25 Q Was Mr. Tyson's role the same with regards to



1 the State House map as the other maps?

2 A Yes.

3 Q Was Ms. Paradise involved -- was Ms. Paradise  
4 also counsel?

5 A Yes.

6 Q With regards to drawing the State House map,  
7 right?

8 A Yes.

9 Q Did you speak with anyone in the General  
10 Assembly about drawing the State House map?

11 A Yes.

12 Q Whom in the General Assembly?

13 A In the House, you mean?

14 Q Yeah, I'm sorry. Whom in the House did you  
15 speak about --

16 A Yes.

17 Q -- drawing the State House map? Thank you.

18 A Chairman Rich. We did have a meeting with  
19 Speaker Ralston regarding the House map, and there were  
20 House members, House leadership in that meeting.

21 Q Do you remember -- oh, I'm sorry. I didn't  
22 mean to interrupt.

23 A Go ahead. I'm still...

24 Q Yeah. Do you remember what House leadership  
25 was involved in that meeting?



1           A     Yes. The Speaker Pro-Tem Jones was in that  
2     meeting. I'm trying to think. Representative Hatchett,  
3     I think was in there. Representative Burns, who is now  
4     Speaker Burns. And I can't remember. Mr. Tyson was in  
5     that meeting.

6           Q     Are you referring -- you've mentioned  
7     Representative Rich, Speaker Ralston, House leadership,  
8     Representatives Hatchett and Burns, Speaker Pro-Tem,  
9     Mr. Tyson. Was there a single meeting that you had with  
10    them about the State House map?

11          A     I remember a single meeting. I don't  
12    remember -- there were not multiple meetings.

13          Q     Okay. Was it another working session, similar  
14    to the working session you had regarding the State Senate  
15    map?

16          A     I don't know that it was a working session in  
17    the same capacity. That was -- it was not -- I was not  
18    over Zoom during that meeting, so it was a little  
19    different. I was on a laptop, so it was a little bit --  
20    it wasn't quite the same scenario, but just to review the  
21    map and look at particular areas.

22          Q     Was -- when you say you were on a laptop, does  
23    that mean you were there in person with them?

24          A     Yes.

25          Q     And you had a laptop?



1 A Yes.

2 Q Could the other members of this meeting see the  
3 map?

4 A Somewhat. Not easily, but some.

5 Q Did they have to look over your shoulder to  
6 look at the laptop?

7 A They did not look over my shoulder. They more  
8 asked questions and I could answer questions.

9 Q So during this meeting, they only asked you  
10 questions and you answered them about the composition of  
11 the map?

12 (Court reporter clarification.)

13 THE WITNESS: Yes. That's my recollection of  
14 the map.

15 Q BY MR. CANTER: Was that meeting in this  
16 building?

17 A No.

18 Q Where did the meeting -- where was that meeting  
19 held?

20 A In the Capitol.

21 Q Do you remember when that meeting occurred?

22 A I do not. That same time frame.

23 Q Late, late -- around October?

24 A Probably October.

25 Q Yeah. But the blind House map was drawn in



1 early October?

2 A I don't remember the dates that it was drawn.  
3 It would have been in October.

4 Q And this meeting occurred after the blind map  
5 was drawn?

6 A Yes.

7 Q Because it was a different type of word  
8 session, but it was a discussion --

9 A A discussion.

10 Q -- about the lines after there had been more  
11 drafts prepared?

12 A I don't recall when it fell in the making  
13 changes to the draft, or if that was before we made  
14 changes or if it was after. I would assume it was closer  
15 to being after, but I don't recall.

16 Q How long was this meeting?

17 A Not very long.

18 Q An hour?

19 A Maybe an hour.

20 Q How long was the working session with the --  
21 regarding the State Senate map?

22 A There wasn't quite the same type of a meeting  
23 for the State Senate map, so I don't --

24 Q So --

25 A I don't know what meeting to --



1 Q Well, so -- sure. Let me rephrase.

2 You referred to having a working session with  
3 Chairman Kennedy, Mr. Tyson, Ms. Paradise about the State  
4 Senate map. Am I recalling that?

5 A Right. Well, we would have had several  
6 meetings where we discussed the map. There wasn't one  
7 session where we had other multiple senators involved at  
8 the same time that I recall. So the Senate was a little  
9 different in that respect.

10 Q You met with Chairman Rich regarding the State  
11 Senate map?

12 A Yes.

13 Q Was it the same type of process that you had  
14 with Senator Kennedy, where you had a blind map and then  
15 you reviewed it with her?

16 A Yes.

17 Q And then she, as the sponsor of the map, would  
18 either direct you to make changes or bring in other  
19 members of the House who would make directions for  
20 changes?

21 A Yes. It was my understanding both chairmen  
22 were meeting with members and had opened up office time  
23 and meeting time to take input from the members about the  
24 map and their districts. And I don't know how many  
25 members each of them met with, but they did have those



1 meetings and that frame of reference. So that when we  
2 met together, they could use those meetings and the input  
3 they received from members to make adjustments if the --  
4 if the draft didn't look -- if they felt like this member  
5 had requested this and we weren't -- if we could  
6 accommodate things, we would try to accommodate those  
7 things.

8 Q But you weren't involved in those meetings?

9 A I was not.

10 Q Was anyone in your office involved in those  
11 meetings?

12 A No.

13 Q You just knew they existed?

14 A Right.

15 Q Would Chairman Rich mention them to you?

16 A Yes.

17 Q Sometimes specific meetings?

18 A Maybe.

19 Q Yeah.

20 We've been going about an hour, I think. Would  
21 this be a good time to maybe take a 15-minute break?

22 A I'm -- whatever.

23 THE WITNESS: Patrick?

24 MR. JAUGSTETTER: Sure.

25 MR. CANTER: Thank you.



1 THE VIDEOGRAPHER: The time is 10:20, and we  
2 are going off the video record.

3 (The deposition was at recess from 10:20 a.m.  
4 to 10:38 a.m.)

5 THE VIDEOGRAPHER: The time is 10:38. We are  
6 back on the video record.

7 Q BY MR. CANTER: Hi, Director Wright.

8 A Hi.

9 Q During the break, did you discuss the content  
10 of your deposition testimony with your counsel?

11 A No.

12 Q With anyone else?

13 A No.

14 Q You mentioned earlier that Mr. Knight and  
15 Mr. O'Connor did not help draw the maps, were not  
16 involved in drawing the maps in any way; is that correct?

17 A Yes.

18 Q Did Mr. Knight provide you with any -- did you  
19 talk about any data -- I'll start over.

20 Did you talk about any data related to the maps  
21 with Mr. Knight?

22 A No.

23 Q Did you talk about any numbers or guidelines  
24 with Mr. Knight related to the map?

25 A No.



1 Q And then I should be clear. When I asked that  
2 question of Mr. Knight, it's for all three maps.

3 A Right. No.

4 Q The same question with Mr. O'Connor. Did you  
5 talk about any data or information related to any of the  
6 maps?

7 A No.

8 Q Would it be fair to say that Mr. Knight and  
9 Mr. O'Connor were not involved in any way at all with the  
10 three maps?

11 A Mr. Knight met with some members on the House  
12 map, is the only one that he worked with some folks on  
13 after the draft I think had come out or during the work  
14 development of it, but that's the only time that any --  
15 either of them had any working with it.

16 Q You said that Mr. Strangia in your office  
17 provided the layers for the map?

18 A In part. He works on some of that, yes.

19 Q And so he was in part involved with drawing --

20 A No.

21 Q -- the three maps?

22 You would not consider that --

23 A Not at all.

24 Q All right. Fair enough.

25 Was there anyone else in your office who was



1 involved in any way with drawing any of the three maps?

2 A No.

3 Q It was really just you?

4 A It was just me.

5 Q Okay. That's a lot of work.

6 A You are telling me.

7 Q So what was Mr. Knight and Mr. O'Connor doing  
8 during that period?

9 A We also were working a local redistricting that  
10 was beginning at the same time for counties, cities,  
11 things like that. Mr. Knight is our local redistricting  
12 coordinator, so that is part of his responsibility to  
13 oversee. We had two new staff members that were also  
14 working on that that he was helping train and teach.

15 Mr. O'Connor was dealing with members who  
16 requested information, maps. He does map requests, so he  
17 would provide from the current stuff and from the new  
18 Census data, information to people who requested it.

19 Q You mentioned that Mr. O'Connor was -- would  
20 you say communicating with members about map information?

21 A Sure, from the current maps that we were on at  
22 the time and the new Census data as it applied to those.

23 Q I see. So just so I understand --

24 A Uh-huh.

25 Q -- you had the benchmark maps. Is it all right



1 if I call the maps from 2010 the benchmark maps?

2 A Sure.

3 Q You had the benchmark maps, and then Census  
4 data came out?

5 A Uh-huh.

6 Q And members of the General Assembly, both the  
7 House and the Senate, had questions about how the Census  
8 data impacted their districts?

9 A Sure.

10 Q And Mr. O'Connor would answer those questions?

11 A If he was the person that they met when they  
12 came in. It could have been any of the staff.

13 Q But he wasn't assigned that role specifically?

14 A Not specifically.

15 Q Did any of those conversations when members  
16 would come in impact your decisions when drawing the  
17 maps?

18 A No.

19 Q Was there a decision at any time for you to be  
20 the sole and only person to work on the three statewide  
21 maps?

22 A A decision by who?

23 Q By you.

24 A Yes.

25 Q When?



1 A When it started.

2 Q Before the Census data came out?

3 A I -- I feel as though I was planning to do that  
4 if I was able to, dependent upon -- of course, Mr. Knight  
5 had to help with part of that map, the meeting with some  
6 members, because I was in a meeting on the Senate side at  
7 the same time. So it was my intent to try and do all of  
8 it to my abilities, within my abilities.

9 Q And why did you make that choice?

10 A Because I'm the director of the office. I have  
11 the most experience and that is my job.

12 Q Mr. Knight and Mr. O'Connor have worked at the  
13 office for some time, right?

14 A Yes.

15 Q And they have drawn maps before as well?

16 A Mr. Knight has.

17 Q Mr. O'Connor has never drawn a map?

18 A He does not do map drawing. That's not his  
19 work.

20 Q What is Mr. O'Connor's role within the office?

21 A He is a data -- redistricting data specialist.

22 (Court reporter clarification.)

23 Q BY MR. CANTER: And what does that mean?

24 A He likes looking at numbers and reports and  
25 historical trends and population figures, and he provides



1 that information as requested.

2 Q Why would someone request that information?

3 A There are a lot of people who request that  
4 information and like to look at the population, the  
5 growth, the changes, past electoral trends, things like  
6 that.

7 Q Did -- has Mr. -- did Mr. O'Connor provide any  
8 of the redistricting data information to any members  
9 about the draft maps that you prepared?

10 A He did not see the draft maps until after they  
11 were made public, so no, he was not able to do that.

12 Q So he could have provided about the published  
13 draft maps?

14 A Once the maps were made public, he could have,  
15 yes.

16 Q Right. Are you aware of that at all?

17 A No.

18 Q If Mr. O'Connor provided data to members about  
19 any of the published maps, whether they are the draft or  
20 the final, you wouldn't be aware of that?

21 A I would not.

22 Q Okay. Did anyone tell you that he provided  
23 data analysis about the maps?

24 A No.

25 Q Okay. You mentioned that Mr. Knight does draw



1 maps?

2 A Yes.

3 Q What is his role within the office?

4 A I just mentioned he's the local redistricting  
5 coordinator, so he oversees most of the local  
6 redistricting for all of our 159 counties and a whole lot  
7 of cities, and --

8 Q Yeah.

9 A -- right.

10 Q And he was not involved in any way in drawing  
11 the statewide maps?

12 A Just the one meeting I mentioned with the  
13 House.

14 Q Did you tell Mr. Knight and Mr. O'Connor this  
15 at some point?

16 A I don't know that that was ever verbally  
17 explained that that's how it was going to be. I think  
18 there was the expectation that has always been my role,  
19 and so it wasn't anything new for me to do that this  
20 time.

21 Q There was just a -- an understanding, given the  
22 roles and responsibilities within the office, that you  
23 would be the sole person working on the statewide maps?

24 A Yes.

25 Q You mentioned that you were able to -- you



1 received directions from -- sorry, I'll rephrase.

2           You mentioned earlier that with regards to the  
3 Senate map, you received directions on how to draw the  
4 lines from -- either directly from Chairman Kennedy or  
5 through Chairman Kennedy from other senators. Is that  
6 basically right?

7           A    Yes.

8           Q    And it was the same process with the State  
9 House map but with Chairman Rich, not Chairman Kennedy?

10          A    Yes.

11          Q    What was your process for receiving directions  
12 on how to change the lines with regards to the  
13 Congressional map?

14          A    Well, I think we talked about the meeting,  
15 jointly meeting with them, so same type of thing. Input  
16 from whatever they had, conversations or whatnot. There  
17 were also considerations, of course, from things we had  
18 heard from public hearings and other things to try and  
19 incorporate into those maps, so those decisions were made  
20 in coordination with all of that together.

21          Q    Did you use a blind map for the Congressional  
22 map -- sorry, let me rephrase.

23          A    Yeah.

24          Q    You mentioned -- that's fair.

25                You had mentioned creating a blind Senate map



1 and a blind State House map --

2 A Right.

3 Q -- as a starting point?

4 A Right.

5 Q Did you create a blind Congressional map?

6 A I don't recall if I used the first map that I  
7 had already drawn as a baseline draft or if I drew a new  
8 draft to start from. I don't remember which one I did  
9 for that.

10 Q So it's possible that the -- what I called the  
11 Duncan-Kennedy map was your blind map?

12 A It is possible. I don't --

13 Q Okay.

14 A I don't recall clearly whether I started from  
15 that one or if I started from a new one.

16 Q I had previously asked about whether  
17 Mr. O'Connor was involved with some -- providing any data  
18 or information to you related to the maps in any way,  
19 right?

20 A You're asking if you asked me that?

21 Q Yeah.

22 A I think you've asked that.

23 Q Yeah, I wanted to confirm.

24 Did Mr. Knight provide you with any data or  
25 information about the maps in any way?



1 A No.

2 Q And are you aware of whether anyone asked  
3 Mr. Knight about data or information on the maps and he  
4 answered that once they were published?

5 A I have -- do not know what he has worked on.

6 Q Yeah. Yeah. You mentioned that you've had  
7 some conversations about the maps over Zoom?

8 A Yes.

9 Q You could do chat in Zoom, you know that?

10 A Yes.

11 Q Were any chats written down, communications  
12 completed during the Zoom calls?

13 A I don't recall using the chat during those  
14 meetings.

15 Q Okay. You don't recall using them at all?

16 A No.

17 Q All right. Was there any other sort of  
18 electronic communications, other than e-mail which we  
19 talked about, that you used to discuss or convey  
20 information about the maps?

21 A No.

22 Q It was -- okay.

23 We talked about drawing the maps and sort of  
24 providing information related to the maps with Mr. Knight  
25 and Mr. O'Connor. Is it the same answer with everyone



1 else in your office?

2 A Yes.

3 Q What about their presence at any of these  
4 meetings regarding any of the statewide maps? Were they  
5 present at any of the meetings you had with the  
6 legislators discussing it?

7 A No, they were not.

8 Q Are you aware that you are being deposed today  
9 in your personal capacity and also in a representative  
10 capacity for the LCRO?

11 A Yes.

12 Q Did you do anything to prepare for today's  
13 deposition?

14 A Yes.

15 Q What did you do?

16 A Reviewed current maps, documents, reports and  
17 things that are on our website. Reviewed the documents  
18 that were provided. I don't know what the method they  
19 were provided, but the large amount of documents that  
20 were sent.

21 Q Yeah.

22 A I did speak with counsel. Prayed.

23 Q Did you speak with any individuals other than  
24 counsel?

25 A No.



1 Q How many times did you speak with counsel?

2 A Two or three.

3 Q Recently?

4 A Yes.

5 Q How recently?

6 A Yesterday.

7 Q Okay. Unless, like I was just doing in the  
8 last segment, I specifically asked you to answer in your  
9 personal capacity, will you understand that moving  
10 forward, all of my questions are addressed to you in your  
11 representative capacity? Does that make sense?

12 A Yes, I understand that.

13 Q Yeah.

14 A But I also know that I operate in a staff of  
15 six other individuals that I don't have, you know,  
16 intricate knowledge of what each of them did and said on  
17 any given day, so...

18 Q Your knowledge is limited to your preparation?

19 A Okay.

20 Q Is that fair? Is that what I am understanding  
21 you to say?

22 A Preparation of for today?

23 Q Yeah. So I'll back up. As part of the  
24 subpoena that we sent related to deposing you in your  
25 representational capacity, there was a list of topics.



1 Are you aware of that?

2 A Yes.

3 Q Right.

4 A I think I saw that document.

5 Q So did you prepare for today's deposition in  
6 reference to being able to provide responses regarding  
7 those topics?

8 A Not specifically, no.

9 Q Okay. Okay. I guess I don't know how I'm  
10 going to literally mark this, but I would like to mark  
11 this document as Exhibit 1.

12 MR. CANTER: Patrick, would you like one?

13 MR. JAUGSTETTER: Yes, please.

14 MR. CANTER: And Bryan, would you like one?

15 MR. TYSON: Please. Yes.

16 MR. DAVIS: And I'm putting it on Exhibit Share  
17 as well.

18 MR. CANTER: Yeah, and it should be available  
19 over Exhibit Share as well. Yeah.

20 (Deposition Exhibit 1 was marked for  
21 identification.)

22 Q BY MR. CANTER: This is your declaration from  
23 the preliminary injunction hearing in different but  
24 related case involving the Georgia Congressional maps; is  
25 that correct?



1 A Yes.

2 Q All right. Did you write this?

3 A I've worked -- worked on it, yes.

4 Q Do you agree with everything that's stated in  
5 here?

6 A I think there were some typographical errors  
7 that I don't think were in my final version of it, and  
8 I'm not sure how that --

9 Q Fair enough.

10 A -- went across, but there were some things like  
11 that in it.

12 Q Okay. But the substance of this document you  
13 agree with?

14 A Yes.

15 Q This document reflects the responsibilities and  
16 activities of the LCRO, correct?

17 A Can you clarify what you mean by that?

18 Q Yeah. Page 1, paragraph 2, you have a  
19 description of the Legislative and Congressional  
20 Reapportionment Office?

21 A Yes.

22 Q And page 2, paragraph 3, you have a description  
23 of your role as the executive director?

24 A Correct.

25 Q Are these accurate?



1 A Yes.

2 Q At a high level, does the LCRO do anything  
3 which this document does not reflect?

4 A When you say "at a high level"?

5 Q I'm not asking you to go into the specifics,  
6 like 9 to 5.

7 A This is an overview of what we do, yes.

8 Q You mentioned that the LCRO is a joint  
9 committee -- I don't remember your exact words -- for the  
10 General Assembly?

11 A The joint office of the General Assembly, staff  
12 office.

13 Q Do you have a boss? And if so, who would be  
14 your boss?

15 A So the Legislative Services Committee makes  
16 decisions regarding the -- the joint office staffs.

17 Q I see.

18 A I -- that's typically who makes, like they have  
19 to -- certain approvals and things like that go through  
20 them.

21 Q So it's a committee within the legislature?

22 A Yes.

23 Q I see. And that's a joint committee?

24 A I think it's a joint committee, bipartisan  
25 committee, leadership.



1 Q Okay. This document that I have marked as  
2 Exhibit 1 was introduced as your expert report at the PI  
3 hearing, right?

4 A Yes.

5 Q And you were proffered at the hearing as an  
6 expert on the topics of redistricting in Georgia and the  
7 analysis of demographic data in Georgia; is that right?

8 A I don't know what that's coming from, but I  
9 guess so, yes.

10 Q I will tell you that that was a quote from the  
11 transcript that Mr. Tyson said in regards to seeking to  
12 proffer you as an expert.

13 A Okay.

14 Q Do you have any reason to doubt that that's  
15 correct?

16 A I don't have any reason to doubt that.

17 Q Did the court qualify you as an expert in  
18 relation to the PI hearing?

19 A Yes, it's my understanding.

20 Q During the PI hearing, was Mr. Tyson your  
21 counsel?

22 A I don't believe he was my counsel in that  
23 hearing.

24 Q Do you know who he was counsel for?

25 A I don't exactly.



1           Q   Stepping back for one second then, do you know  
2   if Mr. Tyson was counsel for the LCRO in relation to  
3   drawing the three statewide maps?

4           A   I don't know that the office had counsel that  
5   was hired specifically for the office.

6           Q   So the LCRO had no counsel in relation to  
7   drawing the three statewide maps?

8           A   So the -- we work on behalf of our chairman and  
9   the chairman under who we report to in those particular  
10   instances, or the members, any member who wants to work  
11   with us. My understanding was Mr. Tyson was hired on as  
12   counsel for that redistricting process through the  
13   General Assembly, so therefore, those members would have  
14   had him as their counsel. And indirectly through that  
15   relationship, then we would have also had access.

16                   Does that make sense?

17           Q   It does, yeah.

18                   Do you -- and do you have any more specific  
19   details about, you know, who went through the process of  
20   retaining Mr. Tyson?

21           A   I do not know anything about that process.

22           Q   The LCRO completed a technical review of the  
23   three statewide maps, right?

24           A   We don't technically review maps. We draw  
25   ourselves.



1 Q Okay.

2 A In the process by which we do other technical  
3 reviews, if that makes sense.

4 Q Okay. How about this, when you were drawing  
5 the three statewide maps --

6 A Uh-huh.

7 Q -- did you consider whether there were precinct  
8 splits present?

9 A Yes.

10 Q And by "precinct splits," do you mean state  
11 precincts as opposed to VTDs released by the Census  
12 Bureau?

13 A So to clarify, the VTDs that are released by  
14 the Census Bureau in Georgia do match our precinct layer.  
15 That layer is built based on our 20 -- and this current  
16 one is built off our 2018 precinct layer, so it does  
17 correspond to the same.

18 Voting precincts know we had a 2020 precinct  
19 layer that we had compiled following the 2020 election,  
20 but that was not completed in time to submit to the  
21 Census Bureau to be used as a VTD layer. So we kind of  
22 had both layers to use. In most cases -- a lot of the  
23 cases they were the same in certain counties, unless  
24 there had been a change in their precincts from 2018 to  
25 2020.



1           Q    So when you say you determined whether there  
2   were precinct splits, you mean both state precinct splits  
3   and VTD splits?

4           A    So it would really be irrelevant with the VTD  
5   splits, because those precincts were two years old. So  
6   in counties where precincts are the same, then that would  
7   be relevant. In counties that have made changes to their  
8   precincts, complying with the newer precinct layer would  
9   be the more logical choice because that's the current  
10  precincts that they were operating under.

11          Q    What was more important -- so I understand,  
12  what was more important to you was whether there were  
13  splits in the state precincts?

14          A    Yes, but I did look at both, obviously.  
15  Reports that Maptitude runs are gonna base off the VTD,  
16  so...

17          Q    But given the -- given that the VTDs might not  
18  have been up to date, the state precincts were more  
19  important in your sort of overall determination?

20          A    Yes.

21          Q    Okay.

22          A    But they were not also on the 2020 geography  
23  because they were drawn before we had the new data from  
24  the Census. So it was also another issue where we  
25  couldn't -- sometimes there was overlap in the geography.



1 This is a GIS situation, so it makes it a little bit more  
2 challenging then to have that built off of an older  
3 geographic file.

4 Q Even given the challenges, were you able to  
5 make assessments of whether there were state precinct  
6 splits?

7 A Yes.

8 Q Did you make assessments?

9 A Yes. We worked with both files.

10 Q Did you analyze whether there were city splits?

11 A I don't know that I did too much analysis on  
12 that, but I did keep that in mind as working on -- on the  
13 plans.

14 Q More important was the question of precinct  
15 splits than city splits?

16 A Yes.

17 Q How about municipality splits?

18 A A city and a municipality are the same thing.

19 Q Sometimes in California they are a little  
20 different.

21 A Not here.

22 Q Fair enough.

23 How about county splits?

24 A Yes.

25 Q And would county splits have been more



1 important than city splits?

2 A Yes.

3 Q How about comparing county splits and state  
4 precinct splits?

5 A County splits is most important.

6 Q Did your analysis include whether the districts  
7 were contiguous?

8 A Yes.

9 Q Did it include whether the districts were  
10 compact?

11 A I didn't run any kind of analysis on whether  
12 they are compact, but compactness I feel like is in the  
13 eye of the beholder, and that kind of is the  
14 consideration we take all along as we draw the maps.

15 Q You looked at the districts to see whether they  
16 were compact?

17 A Yes.

18 Q But you didn't, for example, use a Reock  
19 measure --

20 A No.

21 Q -- to determine whether they were compact?  
22 And you didn't use a Polsby-Popper measure?

23 A No.

24 THE REPORTER: Use a what?

25 MR. CANTER: Polsby-Popper measure. I know.



1 It's two words. Two last names.

2 THE WITNESS: No, I did not.

3 Q BY MR. CANTER: Okay. Did you analyze or  
4 assess as part of your drawing of the statewide maps  
5 whether the new districts would preserve or split  
6 communities of interest?

7 A So we did not have a community of interest  
8 layer. We don't have that type of geography, so it's  
9 very hard to determine that. We rely upon feedback from  
10 the public hearings, people that mentioned their  
11 community specifically, but to do that kind of analysis  
12 is a lot more difficult without something to compare that  
13 to.

14 Q Sure. Was it just information from the public  
15 hearings that you relied on to make a communities of  
16 interest assessment or was there anything else?

17 A Well, of course, we would expect members to  
18 know their communities, so hopefully, if they feel  
19 there's a concern from their community being divided,  
20 they would bring that to the attention of the chairman.

21 Q Did you analyze whether new districts would be  
22 difficult for election administrators to administer?

23 A That goes along with the split of the county  
24 and the precincts.

25 Q Okay. You'd say that's part of one and the



1 same thing?

2 A Right. The fewer the splits, the easier it  
3 would be for them to assign voters, especially under a  
4 compressed time frame.

5 Q Got it. I understand that's especially the  
6 case with precinct splits?

7 A Yes.

8 Q As part of your analysis of the maps, what did  
9 you do to confirm that they were in compliance with the  
10 Voting Rights Act?

11 A So compliance with the Voting Rights Act is a  
12 legal opinion, so my work on drawing the map would  
13 create -- try and maintain districts that we had  
14 previously had that were districts that had been  
15 majority-minority population districts. We try not to  
16 reduce the number that we had before, and I would try to  
17 make sure that what we were drawing, to the best of my  
18 ability, continued that, if possible, but then I would  
19 also ask them to have those reviewed by counsel for that  
20 compliance.

21 Q So would it be fair to say that as a nonlawyer,  
22 you tried your best to ensure compliance, but ultimately  
23 that wasn't a determination you were making?

24 A True.

25 Q Okay. And the way you tried your best was to



1 preserve existing majority-minority districts?

2 A Yes. If I happen to know of an area that there  
3 was, for instance, Hispanic population growth in  
4 particular areas, and I was able to create a district  
5 there, then that would be something we would try to do in  
6 those areas. Of course, again, counsel would need to  
7 say, yes, that's a good thing to do; go ahead and do  
8 that.

9 I think that's kind of the premise of how -- I  
10 do know a lot about state geography and whatnot, so using  
11 that knowledge and seeing the -- the change in the  
12 population data, of course, considering all of that,  
13 where those districts can be drawn. And that's along  
14 with all the other criteria that we're considering, we're  
15 trying to also do that as well.

16 Q You mentioned that your knowledge of state  
17 geography contributed to your sort of nonfinal but  
18 relative determination of compliance with the VRA?

19 A Uh-huh.

20 Q Was there anything else that you considered?

21 A I think you've covered a lot of the things that  
22 we considered.

23 Q I'm sorry, considered in reference to  
24 compliance with the VRA. So, for example, did you look  
25 at any Census data?



1           A     That's pretty much all we look at is Census  
2     data.

3           Q     Okay. So was -- I'll try one more time.

4                 Was your -- as part of your sort of assessment  
5     of compliance with the VRA, did you look at the Census  
6     data and say, oh, there is -- this reflects changes in X,  
7     Y, and Z, and, thus, compliance to the VRA might require  
8     A, B, C?

9           A     I don't know that I did it quite like that.

10          Q     Yeah.

11          A     But, yes, if we know that there is changes in  
12     certain areas, then we might know that that's going to  
13     result in -- you know, I think we did increase the number  
14     of districts that we had that were majority-minority from  
15     before and also created a lot of minority opportunity  
16     districts. So, yes, we consider a lot of those things,  
17     the Census data and trends and whatnot that were in those  
18     areas.

19          Q     You just used the term "minority opportunity  
20     districts"; is that right?

21          A     Yes.

22          Q     What does that mean?

23          A     Districts where they may not have the majority  
24     of the -- or over 50 percent of the population in that  
25     district, but they have a strong influence in the



1 district in terms of the amount of population there.

2 Q So you -- that was helpful. Thank you.

3 You also just used the term "strong influence."  
4 What does that mean?

5 A I think that's pretty self-explanatory. If you  
6 have a large population in a district, then that -- that  
7 population can strongly influence the outcome of that  
8 election and would have a strong influence on whoever is  
9 elected.

10 Q So if there was 49 percent minority population  
11 in a district, would that be a strong influence?

12 A I think it would be, wouldn't you?

13 Q Yeah. How about 45?

14 A Pretty strong.

15 Q 30?

16 A I don't know that there's a particular number.  
17 We didn't have a target number to say this is and this  
18 isn't. I think that's just, take all of it into account  
19 together.

20 Q But you tried to keep in mind that you could  
21 draw districts where minority population had a strong  
22 influence?

23 A Yes, and we did.

24 Q Okay. But would you say you had an objective  
25 measure in mind for what strong influence means?



1 A No.

2 Q It was a factor that you tried to keep in mind?

3 A Yes. And that would be not the primary factor  
4 as to maintaining the number of majority-minority  
5 districts that we had before and increasing those where  
6 we could. That would take precedence over whether there  
7 were the creation of an additional or an influence  
8 district or opportunity district would be a lesser  
9 objective.

10 Q You just referred to an "influence district" or  
11 an "opportunity district." Does that mean something  
12 different to you?

13 A I don't necessarily believe they are that  
14 different, in my interpretation.

15 Q Okay. I just want to understand.

16 A Right.

17 Q Yeah, okay. So those are the same in your  
18 understanding?

19 A Right.

20 Q Yeah, okay. Great.

21 As part of your review of the statewide maps  
22 that you drew, what did you do to ensure compliance with  
23 the U.S. Constitution?

24 A So the U.S. Constitution speaks to the  
25 congressional districts, I think, and equal population



1 specifically, so in terms of making sure those districts  
2 are equal in population, complying with the U.S.  
3 Constitution.

4 Q What about in terms of compliance with the 14th  
5 Amendment of the U.S. Constitution?

6 A So those are legal questions that I would allow  
7 counsel to weigh in on, if they felt like the maps were  
8 in compliance with those.

9 Q Is there anything else that you did when  
10 completing a map as part of your sort of assessment of  
11 its -- well, assessment of the map?

12 A Yes.

13 Q What else did you do?

14 A I would run certain report checks for  
15 unassigned, since it's plot geography, non-contiguous  
16 piece geography. You could run a process through the  
17 software to check the plan for that. We looked at -- we  
18 did look at incumbent addresses when we were looking at  
19 the maps.

20 That's what -- that's all I can think of at the  
21 moment.

22 Q How did you get the incumbent addresses?

23 A So we reached out -- we had the chairman reach  
24 out to the leadership in all of the -- I'll say the four  
25 caucuses, two in the House, two in the Senate, but -- and



1 both sides, and let the caucuses compile those addresses  
2 from their members and provide that to us.

3 Q It was private information?

4 A Yes.

5 Q Did you know whether a member was intending to  
6 run again?

7 A No.

8 Q Did -- so nobody informed you whether -- nobody  
9 informed you whether they were intending to retire?

10 A No.

11 Q You just received the information you received?

12 A Yes.

13 Q You didn't ask my questions about it?

14 A Unless we couldn't locate an address or there  
15 was an error in an address, the zip code or something,  
16 then we would question those things, but no.

17 Q The report checks that you mentioned --

18 A Uh-huh.

19 Q -- it was for determining whether there was any  
20 unassigned districts or noncontiguous districts?

21 A Unassigned Census blocks.

22 Q Unassigned Census blocks. Thank you. Excuse  
23 me.

24 A Like a piece that might have gotten missed.

25 Q Yeah. So in drawing the map, there was a piece



1 that just for whatever reason wasn't picked up or one of  
2 the --

3 A Right.

4 Q -- districts was noncontiguous?

5 A Right.

6 Q Okay.

7 A Oh, I just thought. We also run a verify plan,  
8 which is just a step in Maptitude, and that can catch if  
9 there's calculation errors or anything weird --

10 Q Got it.

11 A -- like that.

12 Q Got it.

13 A That, too.

14 Q Thank you.

15 Did you do this sort of assessment after  
16 completing the blind maps? And let me be clear. When I  
17 refer to the "blind maps," I'm referring to the first  
18 State Senate map you created and the first State House  
19 map you created.

20 A Yes. I usually run, especially the unassigned  
21 block and noncontiguous check most times on most plans,  
22 especially before I want to show that to someone.

23 Q And did you run -- do this assessment,  
24 including sort of -- actually, let me be clear to get the  
25 answer correctly before.



1           The assessment you did regarding the State  
2     House, the first State House and State Senate maps, was  
3     it the report checks and everything else we've talked  
4     about in terms of splits and compactness and communities  
5     of interest, compliance?

6           A     So a lot of the factors you are asking about --

7           Q     Yeah.

8           A     -- before the last little list are things we  
9     consider as I work through a map.

10          Q     Yeah.

11          A     So I don't necessarily finish it and then go  
12     back and look at those things. I'm looking at that as I  
13     go.

14          Q     Okay.

15          A     The other things are more things you would do  
16     at the end to look for unassigned pieces.

17          Q     I see.

18          A     To look for noncontiguous pieces, things like  
19     that.

20          Q     You are considering these through the whole  
21     process?

22          A     Yes.

23          Q     Did any -- did you communicate any of these  
24     factors to Chairman Kennedy or Chairman Rich?

25          A     Which factors?



1 Q Did you ever speak with Chairman Kennedy or  
2 Rich about split precincts?

3 A Yes.

4 Q About the compactness of districts?

5 A I'm sure we may have discussed that.

6 Q Yeah.

7 A I don't have a specific recollection. All of  
8 those were factors they adopted in their committee  
9 guidelines, so they knew that this was a part of what we  
10 were going to be considering when we worked through the  
11 maps as we drew them.

12 Q Did they ever mention these factors as a  
13 priority?

14 A They were all considered a priority. I don't  
15 think we discussed them in detail beyond the fact that  
16 this was what we were going to consider.

17 Q Did anyone ever mention that one of these  
18 factors was more important than another?

19 A I do not recall that being ever said.

20 Q Do you have an opinion if one of the factors  
21 were more important than another?

22 A I think you have to take all of those into  
23 account when you draw a map.

24 Q Okay. Are you aware that since the 2010  
25 Census, the Georgia population has increased by around 1



1 million people?

2 A Yes.

3 Q And this increase is reflected in the 2020  
4 Georgia Census results?

5 A Yes.

6 Q And the Census results include data broken down  
7 by race?

8 A Yes.

9 Q If I used the term "non-Hispanic white  
10 population" in reference to the Census, would you know  
11 what that means?

12 A Yes.

13 Q What does that mean?

14 A It means someone who filled out their Census  
15 form and marked their race as white and put that they  
16 were not Hispanic.

17 Q Are you aware that the non-Hispanic white  
18 population reflected in the 2020 Georgia Census has  
19 declined since the 2010 Census was published?

20 A Yes.

21 Q Are you aware that Georgia's population growth  
22 since the 2010 Census is due to an increase in people of  
23 color?

24 A Can you say that again? I'm sorry.

25 Q Sure. I'm sorry.



1 Are you aware that Georgia's population growth  
2 since it was reflected in the 2010 Census is due to an  
3 increase in people of color?

4 A I know that there is an increase of people of  
5 color, so yes.

6 MR. CANTER: I am going to mark this as Exhibit  
7 2.

8 (Deposition Exhibit 2 was marked for  
9 identification.)

10 Q BY MR. CANTER: Director Wright, do you know  
11 what this is?

12 A Yes.

13 Q What is it?

14 A This is our district map packet from the  
15 Congressional map.

16 Q Is this the map that was ultimately signed into  
17 law by Governor Kemp?

18 A Yes.

19 Q Okay. And the LCRO generated this packet?

20 A Yes.

21 Q Do you see District 6 on this, on the first  
22 page?

23 A Yes.

24 Q Do you recall drawing District 6?

25 A Yes.



1 Q Do you recall the composition of District 6 in  
2 the benchmark congressional plan?

3 A Yes.

4 Q I'm going to introduce -- or sorry, I'm just  
5 going to hand you another document marked as -- well, it  
6 was marked as Exhibit 10 in Senator Dugan's deposition,  
7 but I am going to mark it as Exhibit 3.

8 (Deposition Exhibit 3 was marked for  
9 identification.)

10 Q BY MR. CANTER: This document reflects on the  
11 left the prior -- the boundaries for Congressional  
12 District 6 under the benchmark plan; and on the right,  
13 the boundaries for Congressional District 6 under the  
14 enacted plan.

15 Does that look right to you?

16 A Yes.

17 Q Would you agree that the prior Congressional  
18 District 6 allowed minority voters to have an influence  
19 over who would become elected?

20 A You are asking about the prior District 6?

21 Q Yes.

22 A I don't know. I don't recall the demographic  
23 breakdown of District 6 before.

24 Q Okay. So would your answer be the same if I  
25 asked about whether the prior District 6 was performing



1 for black voters?

2 A I don't know that because I don't know the  
3 demographics of what it was before.

4 Q Just to complete it, would your answer be the  
5 same if I asked about whether prior, the benchmark in  
6 Congressional District 6 was performing for Latino  
7 voters?

8 A I don't know the performance of the district  
9 before.

10 Q Just to make sure we're on the same page, if I  
11 use the word "performing," would that mean the same thing  
12 to you as an influence or opportunity district?

13 A I'm not sure. It depends on the context of  
14 what you are saying.

15 Q Right. How about this. When I use the word  
16 "performing," all I mean is what we were talking about  
17 before as an influence or an opportunity district.

18 A Okay.

19 Q All right. We were talking about what it  
20 means. Is that fair?

21 A Sure.

22 Q Would you agree that the new Congressional  
23 District 6 is not performing for black and Latino voters?

24 A Well, I have to look at the demographics of  
25 this in the packet that you handed me, but I think that



1 it is a different compilation than what it was before.

2 Q If it would be -- feel free to look at the -- I  
3 think it might be on one, two, three -- page 4 that you  
4 can see --

5 A Yes.

6 Q -- population statistics, and page 5.

7 A So you're -- you're asking me?

8 Q So yeah. After you take a look at the  
9 population --

10 A Right.

11 Q -- statistics about Congressional District 6 --

12 A Right.

13 Q -- do you think that it's a performing district  
14 for black voters?

15 A Well, so it's not a majority or even an  
16 influence district, so if that's what you are saying is  
17 performing.

18 Q Yeah, that's what I mean. Yeah.

19 A Then no, it would probably not be.

20 Q And what makes -- how do you make that  
21 assessment? What is your conclusion? How do you -- I'll  
22 rephrase.

23 On what basis have you drawn that conclusion?

24 A Well, you've got the district is 63.7 white  
25 population, so that's one single race category that has



1 63 percent of the district.

2 Q Why does that information alone inform you that  
3 the district is not performing for black voters?

4 A Well, according to this, the black voters or  
5 black population, not necessarily voters -- we don't know  
6 what the voter numbers are on here -- is 8.58 percent of  
7 the district.

8 Q Why does that mean to you that it's not  
9 performing for the black -- for the black population?

10 A That's a very small number.

11 Q And because it's a very small number, they are  
12 unlikely to be able to elect candidates of their choice?

13 A I would think in that district it would -- they  
14 would still be able to vote for the candidate of their  
15 choice, but it would probably be harder to elect them if  
16 they were voting solely based upon their race.

17 Q Understood.

18 Have you ever done an analysis to determine  
19 whether there is preferences for minority voters that are  
20 consistent across the block of minority voters?

21 A I have not done that kind of analysis.

22 Q You have never done a racially polarized voting  
23 analysis?

24 A No.

25 Q Okay. Do you think the new Congressional



1 District 6 is a performing district for the Hispanic  
2 population?

3 A Along the same line that the Hispanic  
4 population in that district is 10.23 percent, it's very  
5 similar to the same number of population for the  
6 non-Hispanic black population. So same -- it's the same  
7 kind of question as the previous.

8 Q Not performing?

9 A Not performing.

10 Q What if we put the black and Hispanic  
11 population together? I think -- sorry about the math,  
12 but I think that number comes to a little under 20  
13 percent. Would this district be performing for a  
14 coalition of black and Hispanic voters?

15 A So 20 percent is still -- is less than,  
16 obviously, half; is still a relatively small portion. So  
17 if we said 63.7 white population, that means the  
18 difference is nonwhite population. So if you are looking  
19 at the demographics in that way, that's the breakdown of  
20 the population. Whether that -- performance doesn't  
21 necessarily relate necessarily to race, I don't think  
22 always in every case, so...

23 Q Well, let's -- let's say that there is a  
24 population that has less than 20 -- there is a population  
25 that votes as a block --



1 A Uh-huh.

2 Q -- that has less than 20 percent of -- that  
3 is -- represents less than 20 percent of the district.  
4 Do you think that that population has an opportunity to  
5 elect candidates of their choice?

6 A You are saying if they vote as a block?

7 Q Correct.

8 A It would be hard.

9 Q Okay. I'd like to talk about the composition  
10 of CD 6 for a little while, if that's okay. Who told you  
11 to add Forsyth and Dawson counties to CD 6?

12 A I think on the draft map, initially Forsyth  
13 County had already been added into District 6.

14 Q Just to make sure I understand, by "the draft  
15 map," do you mean the Duncan-Kennedy map?

16 A I think it was on that. I'd have to go back  
17 and look.

18 Q Would -- and would that mean you put Forsyth  
19 into CD 6 as part of your blind redrawing?

20 A The initial map that we talked about for  
21 Congressional I had been given a list of possible places  
22 to try and adjust for population, and that may have been  
23 a part of that. On that first Congressional map that  
24 came out, the -- the Kennedy map --

25 Q I know what you're talking about.



1 A -- that.

2 Q Would it be helpful if we called that the blind  
3 Congressional map or --

4 A The September map might be better.

5 Q Then let's do the September map.

6 A I know when that one was.

7 Q Cool. Okay.

8 A Yeah.

9 Q So, you know, we can find that out. No reason  
10 to wonder.

11 MR. CANTER: Let's mark as Exhibit 4 the  
12 September map.

13 (Deposition Exhibit 4 was marked for  
14 identification.)

15 Q BY MR. CANTER: Director Wright, is this the  
16 September map? This is the September Congressional map?

17 A Yes.

18 Q Okay. And so looking at the  
19 September Congressional map, it looks like Forsyth was  
20 added, right?

21 A (No oral response.)

22 Q So did -- I'm sorry for rephrasing, just to  
23 make sure I remember, did you decide to add Forsyth on  
24 your own?

25 A I think it was on the e-mail list as



1 recommended to add to 6 on that.

2 Q What do you mean by "e-mail list"?

3 A We talked about that. I had an e-mail from his  
4 staff.

5 Q Oh, I see.

6 A It was in the documents somewhere.

7 Q I understand. So there was an e-mail from the  
8 staff of Chairman Kennedy?

9 A Chairman Kennedy, uh-huh, on his behalf.

10 Q And the e-mail -- and I know I'm partly  
11 paraphrasing here -- but roughly said, hey, here are some  
12 things we would like you to do for your blind map?

13 A Right. Well, they didn't call that a blind  
14 map, but here's some things we'd like to try on a  
15 Congressional map.

16 Q Do you know why Senator Kennedy's staff wanted  
17 to try adding Forsyth into CD 6?

18 A The desire for district -- or for congressional  
19 District 6 was to make it a more politically electable  
20 district.

21 Q Politically electable for whom?

22 A For the party of the people who were drawing  
23 the map.

24 Q How was that information conveyed to you?

25 A It is obvious to me, but, I mean, I don't -- I



1 don't -- that discussion I think was had at some point.

2 Q Sorry. Sorry.

3 A I don't --

4 Q That question --

5 A -- have a specific --

6 Q Yeah.

7 A -- moment.

8 Q What makes it -- what makes it obvious to you?

9 A Forsyth County tends to vote Republican. It  
10 was a political decision.

11 Q If you are gonna add Forsyth County, you are  
12 going to have to take away something else. Is that  
13 right?

14 A Right. So as the map from the bottom -- of  
15 course, we have mentioned south Georgia's loss of  
16 population, those three congressional districts across  
17 the bottom, and I think even District 12 had a loss of  
18 population or were below in population. They had to  
19 reach upward. It sort of pushed the entire map. It did  
20 this on all three. The effects of that on all three maps  
21 pushed things northward.

22 So some districts around the middle and in the  
23 upper parts in the Metro area were gonna get shifted  
24 further up to where the population was. So the growth in  
25 population there added into District 6 also gave -- met



1     their political goal for District 6, so that would be the  
2     decision they made to push that district into Forsyth.

3           Q     Are you aware that the benchmark Congressional  
4     District 6 -- I'm pretty sure I'm right about this one --  
5     was within 600 persons of the ideal population size for a  
6     Congressional map?

7           A     Yes. I think some of them were closer to the  
8     target size than others, depending upon the pace of  
9     growth. But in any redistricting map, we always say that  
10    doesn't mean you can leave one district in a vacuum. The  
11    effects of other districts, the desires of, you know,  
12    what they want to see in the map impact the shape of the  
13    district, so...

14          Q     It seems like adding Forsyth was one of the  
15    first proposals, though; is that right?

16          A     It was on that initial draft.

17          Q     The initial list --

18          A     Uh-huh.

19          Q     -- requesting information, right?

20                 Are you aware of any other reasons why Forsyth  
21    was added to -- just we'll start with the September map?

22          A     Other than political reasons?

23          Q     Other than the direction from the e-mail from  
24    Senator Kennedy's -- Chairman Kennedy's staff.

25          A     Well, as I said, I think that was the political



1 goal for District 6, so...

2 Q Ultimately in the passed map, Dawson was added  
3 as well?

4 A I'm sorry, can you say that again?

5 Q It looks like, when I look at the passed map,  
6 Dawson County was added on top of Forsyth.

7 A You mean passed, approved. I was wondering --

8 Q Oh, no, I didn't --

9 A -- when you said passed, and I was like --

10 Q I'm sorry.

11 A I was like, what, what?

12 Q I was told I need to stop that. Enacted?

13 A Enacted.

14 Q Yeah.

15 A Yes.

16 Q I'll --

17 A Yes.

18 Q -- rephrase.

19 Yeah. Ultimately the enacted map includes --

20 A Dawson.

21 Q -- Dawson County as well?

22 A That's correct.

23 Q Yeah. What was -- how did you get the  
24 direction to add Dawson County to the enacted map?

25 A That was discussed in the meeting we talked



1 about earlier that I was on Zoom, and we worked on the  
2 map, the Congressional map, and that --

3 Q So --

4 A -- was discussed in that meeting to increase --  
5 (Zoom interruption.)

6 THE WITNESS: Okay. I don't know --

7 MR. JAUGSTETTER: Keep going.

8 THE WITNESS: Okay. What was I saying? The  
9 meeting. Yes, that was discussed in the meeting, to add  
10 that into District 6 to further -- to further increase  
11 the Republican percentage in that district.

12 Q BY MR. CANTER: I believe that meeting included  
13 Chairmans Kennedy and Rich, Mr. Tyson, Speaker Ralston,  
14 Lieutenant Governor Duncan, and some of the Speaker and  
15 other Governor staff, right?

16 A Yes, that's correct.

17 Q Do you remember who directed you to add Dawson?

18 A If I recall correctly, I think it was Speaker  
19 Ralston.

20 Q Did he provide a reason?

21 A As mentioned, the discussion was about the  
22 Republican percentage of the way the district would vote,  
23 so that was what was being looked at and discussed as it  
24 was -- as we were trying that out.

25 Q I believe you said that a map was up on the



1 screen during this conversation?

2 A Yes.

3 Q Was demo -- demographic data reflected on the  
4 screen as well?

5 A Yes. There would have been demographic, as  
6 well as political. I'm not sure how clearly they could  
7 see that from where they were and the way that it was  
8 projected, because I wasn't there with them, but it would  
9 have been on the screen for -- while we were doing it.

10 Q Do you know if there was data reflecting the  
11 race of citizens in the different districts on the  
12 screen? Was it racial data --

13 A What do you mean?

14 Q Yeah, was it racial data reflected on the  
15 screen?

16 A Yes.

17 Q Yeah, it doesn't mean you had demographic,  
18 yeah.

19 A Racial data, as well as political data.

20 Q I'm sorry. I might have misheard you.

21 A Yes.

22 Q Thank you for that confirmation.

23 Did you literally make the change to Dawson  
24 during that meeting?

25 A Yes.



1 Q And did the data change on the screen when you  
2 made it?

3 A The data would change when you --

4 Q Yeah, yeah.

5 A -- change the map, yes.

6 Q So the -- the members -- the participants in  
7 the meeting on the other side of the Zoom at least could  
8 have seen the changes in the numbers?

9 A They could have. The pending change box that  
10 shows up, I don't know if you are familiar with  
11 Maptitude, but it will only show the changing number  
12 while you have the selection highlighted.

13 Once you click that into the district or make  
14 that change, then it switches to the new. You then can't  
15 see the previous. You are not seeing both at the same  
16 time.

17 Q Yeah, no, I know what you mean.

18 A Yeah.

19 Q So when you were about to change -- when you  
20 were about to add Dawson to CD 6, you could see the  
21 racial composition of Dawson under the September map next  
22 to the racial compo- -- I'm sorry, the racial composition  
23 of CD 6 on the September map next to the racial  
24 composition of CD 6, or would it change --

25 A No.



1 Q Okay.

2 A It's going to show the two districts. So  
3 whichever district you are moving it out of and the  
4 district you are pushing it into, it's going to show the  
5 new number for what that would be if you moved -- if  
6 you --

7 Q Okay.

8 A -- clicked that, made that change.

9 Q So right before making -- right before adding  
10 Dawson into CD 6, they are able to see what the new  
11 racial composition of CD 6 would be?

12 A Right. They would see the new number. They  
13 wouldn't see the previous --

14 Q Right.

15 A -- at that point.

16 Q Yeah. But before adding that, you would have  
17 seen the previous --

18 A Right.

19 Q -- composition? Okay.

20 A You could have, yes.

21 Q Yeah, yeah, if they looked.

22 A If you are looking, yeah.

23 Q Yeah, right. And then you click it, and it's  
24 added?

25 A It switches.



1 Q Yeah.

2 Was the discussion just, let's add Dawson, or  
3 was there anything more specific about that? It looks  
4 like the entirety of Dawson County was added.

5 A Yes. We moved -- both those two counties were  
6 in -- added in whole. Of course, trying to divide  
7 counties was not -- as we talked about earlier, it poses  
8 problems with elections and whatnot, so trying to limit  
9 the splitting of counties.

10 I think there was discussion about the fact  
11 that Georgia 400 runs up through that district, so there  
12 is a common road traveling through there, as far as those  
13 areas being together, but the -- there was a lot of  
14 discussion going on. Again, I wasn't in the room, so  
15 it's...

16 Q Could you hear what was in the room?

17 A I could, but again, I'm looking at other things  
18 while they are discussing --

19 Q I see.

20 A -- what they are doing.

21 Q So based on your knowledge -- I understand you  
22 couldn't necessarily hear everything, but based on your  
23 knowledge, was there any other factors that were  
24 considered in the room when deciding to add Dawson County  
25 to CD 6?



1           A    To my recollection, adding Dawson to CD 6 had  
2           to do with the political numbers of the district. That  
3           was the only thing.

4           Q    Okay. You just mentioned that you try hard to  
5           not cut counties. Is that right?

6           A    Correct.

7           Q    I see the new CD 6 cuts right through Cherokee.  
8           Is that right?

9           A    Yes.

10          Q    Did I pronounce it correct?

11          A    Cherokee.

12          Q    Yeah. When was the decision made to add this  
13          portion of Cherokee County to CD 6?

14          A    I think that was a part of that meeting as  
15          well. We were working on the shape of District 6 --

16          Q    Okay.

17          A    -- and the political performance of District 6.

18          Q    Who asked that this portion of Cherokee be  
19          added to CD 6?

20          A    I don't recall.

21          Q    But it was someone that was in the room?

22          A    Right. As we were making adjustments in that  
23          area to District 11 and District 6, that I think we were  
24          able to put Bartow County back together, it previously  
25          had been split before, but then population-wise required



1 that splitting in Cherokee. There was a lot of movement  
2 in making adjustments in those two districts in that area  
3 during that meeting.

4 Q Yeah. Can you help me out? Can we go to the  
5 September map for a second, just -- oh, I see. Bartow  
6 County was split in CD 11 in the September map?

7 A Right.

8 Q But when you added Cherokee to CD 6, you were  
9 able to keep Bartow County whole --

10 A Yes.

11 Q -- in the passed map?

12 A Right.

13 Q Okay. The -- the line that cuts through  
14 Cherokee --

15 A Uh-huh.

16 Q -- right, it's kind of jagged?

17 A Uh-huh.

18 Q Right?

19 A It's a river.

20 Q It's a river. Okay. So it follows the river?

21 A That's -- yes. The precinct lines there follow  
22 the river, and so, therefore, it's following the  
23 precincts, which is, I think, follows the river.

24 Q Great. Thank you for that.

25 A Uh-huh.



1           Q    It looks like a portion of Cobb County was  
2    taken out of CD 6.  Let me rephrase the question.

3                   I'm looking at the side-by-side map right now.

4           A    Okay.

5           Q    I think it's helpful right now.  And I see in  
6    the benchmark CD 6, there is more Cobb County than in the  
7    enacted CD 6?

8           A    Uh-huh.

9           Q    Do you recall taking a portion of Cobb County  
10   out of CD 6?

11          A    Specifically, no.  As I said, we were doing a  
12   lot of movement in that area on the map.  And again, the  
13   push of population does impact what -- where those lines  
14   are drawn.  I don't specifically recall --

15          Q    Okay.

16          A    -- what we did, you know.

17          Q    Do you think that you made that change  
18   regarding Cobb County and CD 6 during the working session  
19   that we've been discussing?

20          A    Cobb County was divided on both of the versions  
21   from September.  In CD 6 it had been -- even before that,  
22   I think it was split.  So that area had always been a  
23   portion of District 6; it had always been divided.  So  
24   it's a similar line on all three versions.  I mean, if  
25   you look at -- I'm trying to remember which.  This is the



1 prior.

2 Q Yes.

3 A So this would have been the benchmark.

4 Q Yeah.

5 A And then this is the September. All three,  
6 that same East Cobb area is in District 6. So to give  
7 you the specifics of how many people moved one or the  
8 other in that area, I don't know.

9 Q Got it.

10 Some portion of CD 6 -- well, let me back up.

11 You added a portion of Cherokee, all of  
12 Forsyth, all of Dawson into CD 6 for, ultimately, the  
13 enacted plan?

14 A Uh-huh.

15 Q Adding more people, you've got to take some  
16 people out. Was there any discussion about where you  
17 were going to take people out?

18 A So I think that had been done on the  
19 September map when we moved District 6 out of North  
20 DeKalb.

21 Q I see. So was the decision to move -- remove a  
22 portion of DeKalb from CD 6 made in the e-mail provided  
23 to you from Chairman Kennedy's staff?

24 A I believe that it did say to shift 6 out of  
25 DeKalb and up into Forsyth, so yes.



1 Q Do you recall any other directions from  
2 Chairman Kennedy's staff about the composition of CD 6?

3 A Not specifically, no.

4 Q Do you remember any other discussions about  
5 CD 6 during -- about the composition of CD 6 during the  
6 working session that we've been talking about?

7 A Yes. There was discussion about a proposed --  
8 or a candidate, a potential candidate in District 6 that  
9 where that person lives and something about that person.

10 Q Do you remember the potential candidate?

11 A I'm trying to remember his name.

12 Q It was a he?

13 A It was a he.

14 Q McCormick?

15 A No.

16 Q But it was a potential candidate that you  
17 wanted to keep in CD 6?

18 A That they wanted to not have in CD 6. But, of  
19 course, candidates for Congress don't have to live in the  
20 district anyway, so...

21 Q Did you talk to anyone who either is in  
22 Congress or who -- actually, I won't make -- break it  
23 down. Did you talk to anyone in Congress about the  
24 composition of CD 6?

25 A Did I talk to anyone in -- say that one more



1 time.

2 Q Yeah. Did you talk to any congressional  
3 representatives about the composition of CD 6?

4 A About 6, specifically 6, no.

5 Q Okay. But you talked to congressional  
6 representatives about some other portions of the map?

7 A I did speak with a member of Congress about the  
8 maps, and this was at the beginning before there were  
9 proposed maps produced, yes.

10 Q Which member?

11 A Sanford Bishop.

12 Q Is there anything else about -- did you receive  
13 any other directions than what we discussed about the  
14 composition of CD 6?

15 A I think that the portion that went into  
16 Gwinnett was something requested from Chairman Rich on  
17 the final version.

18 Q Oh, oh, I see, the portion in the north part of  
19 Gwinnett?

20 A Yes.

21 Q Do you know why Chairman Rich asked to have  
22 that portion?

23 A I think she has connections to that area, so I  
24 assume that's why, but she didn't specifically tell me  
25 that.



1 Q Was that decision also made during the working  
2 session?

3 A Yes.

4 Q And just so that we're clear, the same data was  
5 reflected on the image -- on the screen for the people in  
6 the room to see, for all the changes made to the map?

7 A So the pending change box --

8 Q Yeah.

9 A -- only shows one district at a time --

10 Q Right.

11 A -- if you select it, and then it will show a  
12 second district as you start to move it. That's  
13 typically what was left on the screen, not a full data  
14 view.

15 Q I got it. So that's -- that's a fair point.

16 But is it -- is it true that whenever you were  
17 focused on a district there was data reflected on the --  
18 on the image as well?

19 A Most of the time, yes. There could be a time  
20 I've hidden the window for a reason if I'm doing  
21 something else, but...

22 Q But unless there is some specific reason, you  
23 were always keeping data reflected on the image on the  
24 screen so that they -- the worker -- the people that are  
25 working on the maps with you can see the data



1 composition?

2 A Right. They would see the pending box, not  
3 the -- the full data view. That takes up a lot of space  
4 on the screen. So the pending box would have been there.

5 Q They would see how changes you have made to the  
6 map impact the data composition?

7 A It's much more difficult to look at the pending  
8 change box and then know. Because, as you know, looking  
9 at this, you look at one map and then you have to look  
10 back because you don't remember what you just saw. So  
11 it's a lot harder to do that. It doesn't show all of  
12 that data at one time for you to be able to say, it was  
13 this and now it's this.

14 Q Yeah.

15 A Does that make sense?

16 Q Yeah.

17 A So it's after the fact is easier to go back, if  
18 you want to do that sort of analysis and look at numbers  
19 in a population summary report or in a data view, in  
20 another method. It's much harder to do that while you're  
21 watching it on the screen.

22 Q After the working session, did you provide  
23 printouts or data reflecting the -- comparing the new --  
24 the composition for the plan that you had just prepared  
25 versus the prior version?



1           A    I don't recall providing that in that  
2   particular way, and I don't recall if there was any  
3   changes made to the map after the working session or if  
4   that was the very final one.  I -- I don't want to say  
5   and speculate if there was anything else added or changed  
6   after that.

7           Q    So it's -- it's possible that there are more  
8   changes made to the enacted Congressional map after the  
9   working session?

10          A    It's possible.

11          Q    But you think it probably isn't the case?

12          A    I can't recall.

13          Q    Okay.  The vast majority of the changes were  
14   made during the working session?

15          A    I think the vast majority of the work on that  
16   map was complete during that session.

17          Q    And to be clear, I mean the vast majority of  
18   the work changing from the September map to an ultimately  
19   enacted occurred during the working session?

20          A    Right.  I believe there were several options,  
21   which you would have gotten in discovery, of draft maps  
22   in between the two, that we looked at different possible  
23   adjustments.  Those should have been provided, I'm sure  
24   with all of that, but that was all the same base map to  
25   this map.  It may have overlapped in terms of what was



1 included, different things, trying different things.

2 Most of the time I wouldn't zero out a map when  
3 I finalize it until we've settled on -- because it's a  
4 very tedious process, until they've mostly settled on  
5 what they want the map to look like.

6 Q Do you know who was the representative for the  
7 benchmark CD 6?

8 A Yes.

9 Q Whom?

10 A Representative Lucy McBath.

11 (Court reporter clarification.)

12 Q BY MR. CANTER: Do you know Representative  
13 McBath personally?

14 A No.

15 Q Do you know that she's a black woman?

16 A Yes.

17 MR. CANTER: How long have we been going?

18 THE VIDEOGRAPHER: Over an hour.

19 THE WITNESS: Seven hours.

20 MR. CANTER: I think that this might be a good  
21 time to take another break.

22 MR. JAUGSTETTER: It's a quarter to 12:00,  
23 Jacob. What's your anticipation for lunch, because I  
24 don't want to take a break now and then take another  
25 break for lunch?



1 MR. CANTER: We can go off the record.

2 THE VIDEOGRAPHER: The time is 11:44 a.m. We  
3 are going off the video record.

4 (The deposition was at recess from 11:44 a.m.  
5 to 12:56 p.m.)

6 THE VIDEOGRAPHER: 12:56, we are back on the  
7 video record.

8 Q BY MR. CANTER: Hello, Director Wright.

9 A Hello.

10 Q During the break, did you speak with your  
11 counsel about the subject or the contents of this  
12 deposition?

13 A No.

14 Q Did you speak with anyone else about the  
15 subject or contents of this deposition?

16 A No.

17 Q If you recall before the break, we were  
18 discussing the enacted CD 4; is that right?

19 A 6.

20 Q The enacted CD 6, excuse me.

21 A Yes.

22 Q Yes. Dawson County was added to CD 6. Do you  
23 know the racial composition of Dawson County?

24 A No, I don't, not specifically.

25 Q Do you know the racial composition of Forsyth



1 County?

2 A Not specifically, no.

3 Q Would you agree that Dawson County is majority  
4 white?

5 A I believe that to be true.

6 Q Would you -- would you agree that the vast  
7 majority of Dawson County is white?

8 A How would you measure vast?

9 Q More than 70.

10 A That very well could be true. I don't --  
11 again, I don't know the demographics.

12 Q Sure. But based off your experience as a  
13 demographer, you're pretty sure it's more than 70?

14 A I would think it's around that at least.

15 Q Would you agree that Forsyth County is majority  
16 white?

17 A I believe that to be true, but I'm not sure of  
18 the numbers again on that one either.

19 Q Still pretty high?

20 A Probably pretty high.

21 Q Would you agree that Cherokee County is  
22 majority white?

23 A I believe that's true.

24 Q Do you know whether the portion of Cherokee  
25 County that was added into CD 6 is majority white?



1 A I don't know the demographics specifically.

2 Q Would you agree that the portion of Cobb County  
3 that was taken out of CD 6 is majority people of color?

4 A Again, I'd have to look closely. The areas are  
5 very similar, so you are looking at a few precincts, and  
6 I don't know the demographics of those precincts  
7 specifically.

8 Q The last one is, would you agree that the  
9 portion of DeKalb County taken out of CD 6 is majority  
10 people of color?

11 A I don't know that to be true either.

12 Q Okay.

13 A DeKalb.

14 Q DeKalb, thank you. DeKalb County.

15 A Sure.

16 Q Now, looking at those changes to CD 6 in  
17 totality, adding in Dawson and Forsyth counties, taking  
18 out Cobb and DeKalb counties, would you agree that  
19 this -- these changes make CD 6 more white?

20 A I would have to look at the data to verify  
21 that. I'm not 100 percent sure that they do.

22 Q Do you have a sense right now?

23 A I have no reason to think that you're wrong  
24 based on the demographics of the counties that were added  
25 in, so that's probably true.



1 Q Okay. Okay. Do you know if Lucy McBath was  
2 the candidate of choice for voters of color?

3 A Voter -- I don't know where. I don't know. In  
4 what --

5 Q Sure.

6 A -- election?

7 Q Do you recall that Representative Lucy McBath  
8 represented CD 6 from 2020 to 2022?

9 A Yes.

10 Q Do you know that in the -- whether in the 2020  
11 election Representative McBath was the candidate of  
12 choice for people of color?

13 A I don't know. She was elected from the voters  
14 in District 6. I don't know the demographics of what  
15 that district was at that time, so I can't speak to  
16 whether that was voters of color or just the voters of  
17 the district.

18 Q Can you go back to, I think it was Exhibit 2,  
19 which is the enacted Congressional map. And you see that  
20 CD 4 is next to CD 10?

21 A Yes.

22 Q All right. And if you go to page 2, you have a  
23 blowup of CD 4 next to CD 10, right?

24 A Yes.

25 Q Did you draw the lines that separated CD 4 from



1 CD 10?

2 A Yes.

3 Q Do you remember drawing those lines?

4 A Specifically, no.

5 Q Okay. Okay. Do you see Oxford is right at the  
6 edge between CD 4 and CD 10?

7 A Yes.

8 Q I'd like to pull up an exhibit on Exhibit  
9 Share, so it should pop up on your computer.

10 (Deposition Exhibit 5 was marked for  
11 identification.)

12 MR. DAVIS: I'm going to share my screen, so  
13 you should be able to see it on your screen in a second  
14 here.

15 MR. CANTER: He's loading it.

16 MR. DAVIS: Okay. Can you see something on  
17 your screen? I'm going to make it bigger for you.

18 THE WITNESS: Yeah, I see something.

19 MR. DAVIS: I will make it bigger. There we  
20 go. Is that -- can you see anything?

21 THE WITNESS: I can see red outlines with blue,  
22 red, gray.

23 MR. DAVIS: Great. We can zoom in. If you  
24 want us to zoom in at any point, just let us know,  
25 please.



1 THE WITNESS: Okay.

2 Q BY MR. CANTER: So I'm going to describe the  
3 image on the screen right now.

4 A Okay.

5 Q The blue line represents the congressional  
6 district line.

7 A Okay.

8 Q Below is CD 4. Above is CD 10.

9 A Okay.

10 Q Does that make sense?

11 A Yes.

12 Q The gray box is the city of Oxford.

13 A Okay.

14 Q So if you recall from Exhibit 2 we just looked  
15 at, it's right around where I was pointing to.

16 A Uh-huh.

17 Q Right? The red lines are the state precincts.

18 A Okay.

19 Q Does that make sense?

20 A Yes.

21 Q Okay. Have you ever -- have you ever looked --  
22 when you -- how about this. When you are drawing maps,  
23 do you ever look at the map this zoomed in on an area in  
24 the state of Georgia?

25 A Yes.



1 Q And why do you do that?

2 A There could be a lot of reasons why you would  
3 zoom in.

4 Q Sure. Can you describe some of the reasons why  
5 you would zoom in?

6 A Oh, well --

7 Q Yeah.

8 A -- I mean, on a Congressional map, we try to  
9 use whole precincts where we can, but because you have to  
10 draw them to as a population, or we draw them to a  
11 population of zero deviation, you are going to have to  
12 zoom in down to block level to get the correct numbers of  
13 population so that you can have that deviation to that --  
14 that tight range.

15 Q Okay. So you testified earlier that an  
16 important goal for drawing is to not cut state precincts?

17 A Right.

18 Q And one of the reasons you provided was that  
19 it's administratively difficult --

20 A Uh-huh.

21 Q -- for the election administrators?

22 A Yes.

23 Q Can you describe why it's administratively  
24 difficult?

25 A So when an elections official assigns voters a



1 ballot in a split precinct, they have to create a combo  
2 for the unique district combinations in that precinct,  
3 unless they change their precinct lines, meaning the  
4 voters that are in one district have one combo that  
5 reflects that in the other district assignments that they  
6 are in; and voters that are in that same precinct that  
7 have a different district assignment would require a  
8 different combo, so that they receive the correct ballot  
9 when they go to vote.

10 Q Okay. Now, if we look back at this image and  
11 we look at how the blue line cuts through the city of  
12 Oxford --

13 A Uh-huh.

14 Q -- it looks to me like that line is cutting  
15 through the state precinct; is that correct?

16 A That looks to be, yes.

17 Q How would, on a sort of technical level, you  
18 accomplish drawing a line that cuts through a state  
19 precinct?

20 A What do you mean how would I accomplish it?

21 Q So you drew -- you drew this line so that CD 4  
22 and CD 10 have this composition, right?

23 A Right. So drawing is clicking with a mouse,  
24 not drawing.

25 Q Yeah, yeah. Fair enough.



1           A     Okay.

2           Q     So when you are clicking with a mouse to create  
3     the line between -- I'm going to say it's between CD 4  
4     and 10, because that's what we are looking at. What do  
5     you need to do to draw -- to create a line that cuts  
6     through a precinct? Is it a different process than  
7     creating a line that goes along a precinct?

8           A     So you'd select which type level of geography  
9     you are using for what you are clicking on.

10          Q     Sure.

11          A     You can click on the larger geography. You can  
12     click on counties. You can click on precincts or voting  
13     districts. You can click on Census blocks. When you get  
14     down to this level, you would be clicking on Census  
15     blocks.

16          Q     Please go on.

17          A     At that level. And that's the level you would  
18     be at so that you would know, because you are trying to  
19     reach that perfect ideal district size, finding the right  
20     combination of the population in the Census blocks to  
21     achieve that.

22          Q     You would -- and just so I understand, you  
23     would have to be at the Census block level in order to  
24     draw a line that cuts through a state precinct?

25          A     Say that one more time.



1 Q Would you have to be at the Census block level  
2 layer in Maptitude in order to draw a line that cuts  
3 through a state precinct?

4 A So if the next level of geography we would use  
5 would be the block, so between the precinct, the block,  
6 there's not an in between level. So if you are going  
7 from precinct down to the block to a smaller level, then  
8 block is what you would use --

9 Q Yeah, okay.

10 A -- I think is what you are asking.

11 Q Yeah, that's all I'm asking. That you were --  
12 in order to draw a line that splits a precinct --

13 A Uh-huh.

14 Q -- you have to be at the block level to do  
15 that?

16 A Right.

17 Q Right. Okay. And that means you have  
18 demographic data at the block level?

19 A The blocks contain all of the different levels.  
20 The geography contain the data, so yes.

21 Q Right. Can you describe the block level data?

22 A It's the same data that's in all of the  
23 different levels of geography. It has all of the Census  
24 fields in it, the Census block fields, breakdown of the  
25 demographics and whatnot.



1 Q So is there racial data at the block level?

2 A Yes.

3 Q All right. Is there any other type of demo --  
4 data at the block level?

5 A So when we build our precinct layer, we do  
6 allocate the election data to the block level, so we have  
7 that political data at that level. It's estimating,  
8 based on the demographics in there, based on registered  
9 voter demographics kind of corresponds the two and  
10 allocates down to that level. So we do have estimate  
11 political data at the block level when we do this.

12 Q When you are drawing a map and you are looking  
13 at the block level --

14 A Uh-huh.

15 Q -- is data reflected on the screen?

16 A Yes.

17 Q And is the estimated election data on the  
18 screen with the other data?

19 A Yes.

20 Q You agree that the line we're looking at here  
21 splits through the precinct, right?

22 A At the time, Newton County was considering  
23 precinct changes. We were working with several -- their  
24 elections office, and we had a draft precinct layer that  
25 they were considering, so it's possible that I referred



1 to that at that time. I think I was able to get them --  
2 well, we did have a meeting in order for me to explain  
3 the midst of -- being in the middle of changing districts  
4 would be a very challenging time to change their  
5 precincts, but it's possible that I did look at their  
6 pending precinct layer that they chose not to adopt at  
7 that time.

8 Q There's a college in Oxford, right?

9 A I don't know.

10 Q Okay. Would splitting a college be splitting a  
11 community of interest?

12 A It could be defined as such.

13 Q Okay.

14 A We don't have information on college campuses,  
15 though, in our system to show us where those defined  
16 boundaries are. And we did bump into that at a public  
17 hearing from another college, who questioned the same  
18 thing. And in their case it had to do with the precincts  
19 dividing the campus. We were holding the precincts and,  
20 therefore, it split the campus. But without being given  
21 that information to define those communities, it's very  
22 hard to know where that would be defined -- what that  
23 would be defined as.

24 Q You mentioned earlier that sometimes you need  
25 to split precincts in order to meet deviation



1 requirements?

2 A Yes.

3 Q Do you recall why you split this precinct?

4 A I do not. Population -- I'm sure it would have  
5 been population based.

6 Q Do you know the racial composition of the  
7 precinct that is split on this image?

8 A No, I do not.

9 Q When you were discussing drawing the  
10 Congressional map, did anyone ever ask you to split a  
11 precinct?

12 A In specific terms, no; but knowing that to get  
13 the deviations to zero, I think that was known that that  
14 would be the way that you would achieve that.

15 Q There was an understanding that as a  
16 consequence of some of the requests, precincts would need  
17 to be split?

18 A No, not as a -- not as a consequence of the  
19 request, but as a consequence of getting the deviation to  
20 a perfect zero deviation, it would be virtually  
21 impossible to go through the map -- and I haven't tried  
22 it -- but to try and draw a zero deviation map without  
23 splitting a precinct.

24 Q Okay. Do you remember talking -- do you  
25 remember the working session we were talking about



1 earlier today?

2 A Yes.

3 Q About the Congressional map?

4 A Yes.

5 Q Do you remember talking about the line that  
6 separated CD 4 and 10 during that working session?

7 A No, I do not.

8 Q At any other time, do you recall communications  
9 or requests related to drawing the line between CD 4 and  
10 10?

11 A I don't remember conversation about the line.  
12 In that area, there was a question about an address at  
13 one point. I don't remember where it fell and whose it  
14 was, but that's the only thing I remember about that  
15 area.

16 Q When you say a question about an address, would  
17 that be an incumbent address?

18 A I don't know whose it was.

19 Q Okay. Just a question.

20 How often were you looking at the block level  
21 when drawing maps?

22 A I don't have an answer for that. It varies.

23 Q Would it be fair -- would it be fair to say  
24 that you looked at the block level a lot?

25 A When you get to the point of where you are



1     trying to finalize a map is when you're -- the  
2     Congressional map, is when you are going to look closely  
3     at the block level to try and balance that population.  
4     It's very difficult to zero out a map.

5             Prior to that on a Congressional map you  
6     probably would not -- I would not have been looking at  
7     the block specifically that much.

8             Q     You look at the block level more often on the  
9     State Senate and State House maps?

10            A     The smaller the district size is, the more  
11     likely you are to look at the block layer, because you  
12     are trying to achieve a smaller-sized district, so more  
13     with the Senate map.

14            I think if you look across county splits and  
15     precinct splits, you will see that the -- you have less  
16     of them as you get into the bigger districts, because you  
17     select by larger geography, so...

18            Q     What is the -- would you -- so what is the  
19     geography that you looked at most often when drawing the  
20     Congressional map?

21            A     It would depend on the part of the state that  
22     you are in.

23            Q     How about the part of the state where CD 6,  
24     CD 10, and CD 4, around that is located?

25            A     What was the original question?



1 Q What is the block level -- I'm sorry, what is  
2 the layer that you look most often at when drawing in  
3 that area?

4 A Probably the precinct layer, precincts VTDs,  
5 those two.

6 Q When I say that's one up, does that make sense,  
7 from the block layer?

8 A Right, it's a step larger.

9 Q Yeah, right. And it's a single step larger?

10 A Yes.

11 Q Did you also have all of the Census data  
12 available to determine the effects of changes at the  
13 precinct level?

14 A You mean the pending change --

15 Q Yeah.

16 A -- box? Yes.

17 Q And was all the demographic information related  
18 to that Census data reflected on the screen?

19 A Yes. I typically kept the same data on the  
20 pending change box when I worked on these maps, which  
21 would include the -- the demographics, as well as the  
22 political.

23 Q Was the same estimated election data available  
24 at the precinct level?

25 A At the precinct level, it's not estimate. At



1 the precinct level, it's accurate because that is the  
2 format in which we receive that data.

3 Q And can you remind me where that election data  
4 came from?

5 A It comes from the Secretary of State's Office.

6 Q Does it come from the reapportionment report?

7 A I don't know the name of the report that it  
8 comes from.

9 Q Okay. But you receive it from the Secretary of  
10 State's Office?

11 A Yes.

12 Q Is there a process for receiving that material?

13 A Yes.

14 Q What is the process?

15 A We usually wait until after the general  
16 election in any given year is passed. What we want to do  
17 is make sure that the precinct boundaries that were used  
18 for the election are the final boundaries. Counties do  
19 have flexibility to change those lines somewhat close to  
20 an election, so we want to make sure what is used is what  
21 we have in our system, the correct boundaries.

22 And then after that, we request the information  
23 from the Secretary of State's Office in the format that  
24 we need to import into our system.

25 Q Would Rob -- I'm sorry, Rob Strangia?



1 A Strangia.

2 Q Strangia be the one obtaining this information?

3 A Yes.

4 Q And is it a regular process after every  
5 general?

6 A Yes.

7 Q And you used the data from the Secretary of  
8 State's Office to get election results at the precinct  
9 level and to prepare estimated election results at the  
10 block layer?

11 A Yes. I mean, all of it is built into our  
12 precinct layer, so it's --

13 Q Right.

14 A -- part of one file.

15 Q What is one layer up from the precinct layer?

16 A The county.

17 Q You also have Census data at the county layer?

18 A Yes.

19 Q You also have the same racial demographic data?

20 A Yes.

21 Q What is your performance data at the county  
22 layer?

23 A It's the same file that we would obtain.

24 Q Okay. But now aggregated?

25 A Right, to -- to the county.



1 Q What is one layer up from the county layer?

2 A There is not one layer up from the county  
3 layer.

4 Q That's it?

5 A Multiple counties --

6 Q Okay.

7 A -- in the state.

8 Q Do you -- fair enough. How about this, do you  
9 have a layer that is larger than the county layer?

10 A Just the state.

11 Q The state?

12 A Uh-huh.

13 Q So when you are drawing a map, there is four  
14 layers. There's the state, the county, the precinct, and  
15 the block?

16 A Well, there's a lot more layers than that,  
17 but --

18 Q Okay.

19 A -- those are four of the layers.

20 Q What -- high level, can you describe some of  
21 the other layers?

22 A It would be city limit layer, street layer,  
23 power line, pipeline, water areas, highways and  
24 interstates. I'm trying to think of other geographic.  
25 There is other geographic features, but that's probably



1 most of them.

2 Q Okay.

3 A Historical precinct layers, we would have those  
4 that come into the file. Other things that are part of  
5 the Census within our system, the TIGER files that come  
6 in. All the different TIGER files that come with the  
7 Census geography.

8 Q You mentioned earlier that you don't have a way  
9 to quantify communities of interest?

10 A Correct.

11 Q So none of these layers you mentioned would, in  
12 your understanding, reflect communities of interest?

13 A Correct.

14 Q Just so I understand, what's a TIGER file?

15 A That's the name for the -- it's a Topographic  
16 Integrated Geographic, something around there. That's  
17 what the Census Bureau geography files are called. I'd  
18 have to look up what the letters stand for.

19 Q Sure. That's fine. You don't need to.

20 When you were looking at the Congressional map  
21 with the working session, would you reflect different  
22 layers of the map?

23 A Reflect in what way?

24 Q I'll ask a different question.

25 When you are at the working session, did the



1 people on the screen ever see the block level, the block  
2 layer -- block level layer, how about that?

3 A It's possible.

4 Q All right. Did they ever see the precinct  
5 level layer?

6 A Yes, I'm sure.

7 Q Did they ever see the county level layer?

8 A They're usually all turned on, other than the  
9 blocks until you zoom in.

10 Q They're all -- so at the working session, you  
11 recall that the county and precinct level layers were  
12 turned on?

13 A I'm sure that they would be. I wouldn't have  
14 been working at -- at that level if we were zoomed in, as  
15 you questioned about District 6. We would have been  
16 working with, most likely, precincts in that area. I  
17 don't remember what I have turned on at any given time,  
18 and when you zoom in the map, you do alter, you know, the  
19 layers that are on so that there's clear visibility for  
20 what you are looking at.

21 Q I recall you saying that there was a decision  
22 to move -- sorry -- Dawson into CD 6 during the working  
23 session?

24 A Yes.

25 Q So when they decided -- when the data showed up



1 about Dawson moving into CD 6, they would see data  
2 related to the precinct layer and to the county layer?

3 A It would depend if I had that turned on. But  
4 it wouldn't show a breakdown of the precincts, if that's  
5 what you are asking.

6 Q Yeah, that's what I am asking.

7 A It would not show that.

8 Q Okay. You would have to -- how would that  
9 be -- how would they do that? You would have to be  
10 zoomed in more to show?

11 A Well, the data -- the data is not going to show  
12 up like on the map when you are looking at it, unless  
13 you've got all of that turned on, which is usually too  
14 busy --

15 Q Yeah.

16 A -- for anybody to look at. So any questions  
17 about that would have to be something that would be  
18 manually produced --

19 Q Okay. Okay.

20 A -- through the software.

21 Q So when you are looking -- when they are asking  
22 for changes -- when they ask for you to add Dawson into  
23 CD 6 --

24 A Uh-huh.

25 Q -- they are looking at county level data?



1 A Yes.

2 Q And they probably weren't looking at precinct  
3 level data?

4 A Probably not.

5 Q Okay. Can you go back to Exhibit 2, and you  
6 can stay on the second page. And do you see that CD 14  
7 shows up on the second page?

8 A Yes.

9 Q Did you draw the lines for CD 14?

10 A Yes.

11 MR. CANTER: I'm going to hand to the court  
12 reporter what I'd like to mark as Exhibit 5 (sic), I  
13 believe.

14 (Deposition Exhibit 6 was marked for  
15 identification.)

16 Q BY MR. CANTER: Director Wright, this is  
17 another document which reflects on the left the benchmark  
18 CD 14?

19 A Uh-huh.

20 Q And on the right the enacted plan CD 14. Does  
21 that make sense?

22 A Yes.

23 Q Do you -- and I think you can also see this in  
24 Exhibit 2, but do you see the enacted CD 14 adds a little  
25 piece on the bottom southeast?



1 A I'm sorry, where?

2 Q On the bottom southeast.

3 A Yes.

4 Q And this bottom southeast addition includes the  
5 cities of Austell and Powder Springs?

6 A Yes.

7 Q Do you know that Austell and Powder Springs are  
8 both majority people of color cities?

9 A I do not know the specific demographics of  
10 those cities, but...

11 Q Would it -- does that make sense to you, I  
12 mean, based on your understanding of the demographics of  
13 that area?

14 A Sure.

15 Q Okay.

16 A But the cities themselves are not in their  
17 entirety the area that was taken in. They are just a  
18 portion of it.

19 Q There are -- I just want to understand what you  
20 said. There are other portions of this addition to CD 14  
21 that are not Powder Springs and Austell?

22 A Correct.

23 Q The majority of the addition, though, are those  
24 two cities?

25 A I don't know what the population of the two



1 cities are in relation to the population of that entire  
2 area, but...

3 Q Okay. But at least --

4 A They are -- they are included in the area that  
5 was added into CD 14.

6 Q Right. They are certainly part of it. Okay.

7 Would you say that -- I'm going to call this  
8 just the addition, the southeast addition. Does that  
9 work?

10 A Sure.

11 Q Would you say that the southeast addition can  
12 be justified based off of compactness principles?

13 A Based off compactness principles, I don't think  
14 it makes a huge change in the shape of the district.

15 Q Okay.

16 A It's a small area.

17 Q Would you say that adding the southeast  
18 addition can be justified based off of respect for  
19 preserving communities of interest?

20 A In terms of keeping two cities wholly within  
21 that district, they were maintained and not divided into  
22 any other districts, so if you consider that a community,  
23 they were maintained in one district.

24 Q What about adding an urban community into a  
25 district that is primarily rural?



1           A    I'm sure there are places on the map where that  
2 happens, but this decision to draw this in this area was  
3 above my -- my level.

4           Q    Okay. Let's talk about that then.

5           A    Go right ahead.

6           Q    Why did this piece of CD 14, why did the  
7 southeast addition get added to CD 14?

8           A    Sure. So the push from the south part, as  
9 we've talked about population wise, impacted the other  
10 districts that border up against it. So we already had  
11 removed Haralson County out of 14, and Pickens County  
12 also, as you know, had requested quite vocally to be  
13 wholly within one district and not be divided. So the  
14 decision was made then to push Pickens into a different  
15 district and keep it wholly together.

16                   And there was still a need for District 14 then  
17 to have population. Because the size of District 13 is  
18 what -- it was not modified very much at all. It did  
19 lose part of Douglas County and a little bit of Cobb.  
20 That population needed to go elsewhere. And politically  
21 putting that area into District 11 was not beneficial to  
22 the performance, as you talked about, for District 11, so  
23 it was decided that it would go into 14. That area  
24 voted, I think around 60 percent democratic, so that was  
25 the reason that it was chosen to be pushed into 14.



1 Q That was a lot of information.

2 A There you go.

3 Q When was that -- when was the direction  
4 conveyed to you?

5 A That was part of that working session.

6 Q All right. Do you remember who conveyed that  
7 direction to you?

8 A I do not specifically. It was discussed.

9 Q And were all of those factors that you just  
10 brought up discussed?

11 A Yes. I think that was part of what led to --  
12 to that idea.

13 Q I see. And I know you just said you don't  
14 recall who specifically made the direction, right?

15 A Right.

16 Q But did you have any sort of opinion about  
17 making this change?

18 A Well, I mean, I understood their justification  
19 for their -- that was the political goal that they had,  
20 and I work for them, so, you know, my opinions are not...

21 Q I -- okay. Though it seems like you might, in  
22 fact, have an opinion.

23 A Well, counties are -- larger counties are going  
24 to be split on these maps. We know that. And it is  
25 always better if you are going to split, split within a



1 larger county than to go and split another smaller  
2 county. So putting Pickens back together was definitely  
3 a decision I felt like was a good choice. They requested  
4 that. Let's do that. It made sense to the map, and  
5 it -- it fit into where everything else laid out.

6 This particular area, that was not my decision.  
7 They made that decision, and I do what I am told.

8 Q Okay. So you said that it made sense to keep  
9 Pickens whole?

10 A Yes.

11 Q Would it be fair to say that you didn't think  
12 it made sense to take this piece of Cobb?

13 A Well, no. I will say that it is -- when you  
14 are splitting and dividing between districts, larger  
15 counties are going to already be split. So rather than  
16 cause a county that is much smaller to have to have two  
17 different combinations, two different congressional  
18 districts, especially when they requested specifically to  
19 have that reversed from how it had been, putting that  
20 county back together was a more logical choice than  
21 including an additional split in another county that's  
22 already split.

23 Q You -- I think you just said that putting  
24 Pickens back together so that it's not split --

25 A Uh-huh.



1           Q    -- was a logical choice if the consequence  
2 would be to split Cobb, which already was split?

3           A    Correct.

4           Q    So it was a good idea in this circumstance to  
5 split Cobb into four?

6           A    There were the political justifications for why  
7 they chose to do that. That's the reasoning behind that  
8 split, why that was put into the 14th District.

9                   Had they chosen a different route, that  
10 particular area, as I said, was a strongly democratic  
11 voting area, and putting that into the 11th District  
12 would have reduced the Republican numbers in the 11th  
13 District. The 14th District was a stronger Republican  
14 district, so therefore, adding that democratic area into  
15 a more Republican performing district was not going to  
16 make as big of an impact on the 14th as it would on the  
17 11th.

18          Q    And those were political considerations that  
19 you were -- that were conveyed to you?

20          A    Well, yes, that was what the -- you can look at  
21 the numbers in the data and see.

22          Q    But you're -- you're a demographer, right? Or  
23 you draw maps a lot, right?

24          A    I've been called that, yes.

25          Q    Yeah, yeah. Yeah, you draw maps a lot.



1           As someone who draws maps a lot -- I think two  
2       decades, right, at least -- do you think it was a good  
3       idea to split Cobb into four pieces?

4           A     Cobb is a large county. Splitting Cobb  
5       multiple ways is not an unforeseen situation. Other  
6       Metro Atlanta counties have been split. Fulton is split  
7       four ways, and it's -- it's doable at their level and  
8       easier for them to handle that sort of a change than it  
9       is in a smaller county.

10          Q     Do you think, as someone with experience in map  
11       drawing in the state of Georgia, it was a good idea to  
12       add this southeast addition to the primarily rural CD 14?

13          A     I always try to minimize the splits where I  
14       can. So if that was something that was an option, I  
15       would have preferred to always reduce those splits of  
16       counties, but I also work for the legislature, so...

17          Q     In fact, if we go back to your September map,  
18       which I think is Exhibit 4, this southeast addition is  
19       not in CD 14. It's in CD 13?

20          A     Correct.

21          Q     Or I guess maybe it's a little in CD 11, too?

22          A     Maybe a little both.

23          Q     Yeah. So when you first drew the map --

24          A     Uh-huh.

25          Q     -- you thought the best approach would be to



1 not add Austell and Powder Springs, this area that  
2 included Austell and Powder Springs, into CD 14?

3 A I think if you look at the -- the benchmark  
4 plan, that area was previously in 13, so the change that  
5 was requested when I drew the original map, to my  
6 recollection, was to split -- I think it was to split  
7 Douglas. So the split there was in Douglas, and it's a  
8 deeper split between 3 and 13, than what ended up being  
9 in the Douglas split on the final version. And 13 is --  
10 has less of the Cobb area because of changes in the other  
11 parts of the map.

12 Q Just so I understand, when you say your  
13 original decision, was that your decision or did that  
14 come from the chairman's e-mail?

15 A I could not verify that for sure. I don't  
16 recall whether that was in the e-mail or whether I chose  
17 to do that to try and make the numbers fit, but I don't  
18 remember. I almost do think that that document said to  
19 split Douglas, but I can't remember for sure.

20 Q And so apologies if I'm not reading this right,  
21 but it looks like Douglas is split almost exactly the  
22 same in the September and --

23 A It's -- it's definitely -- if you look at where  
24 the Paulding County line is and comes down and runs north  
25 to south, you can see that on the first draft that -- I



1 call it orange. Yellow/orange is almost all to the east  
2 side of that. If you look at the map that was adopted,  
3 you see there is a significant strip on the west side of  
4 where that line intersects. So there's differences there  
5 between the two. There's -- it's still -- of course, it  
6 is split, but it's a different split.

7 Q You think the -- it's -- it's the addition of  
8 Douglasville into CD 3. Is that about right?

9 I'm looking at page 2 where you can get a  
10 little closer --

11 A Right.

12 Q -- to 3.

13 A I'm not a hundred percent sure how that  
14 originated.

15 Q Yeah, yeah. All right. Because it looks to  
16 me, when comparing the September enacted, that the --

17 A Right.

18 Q -- difference is that Douglasville or around  
19 Douglasville --

20 A This is --

21 Q -- has been added. Does that sound right to  
22 you?

23 A That looks to be about right.

24 Q Okay. Do you know the racial composition of  
25 Douglasville?



1 A I do not specifically.

2 Q Okay. There were a lot of reactions to  
3 including the southeast addition into CD 14. Do you --  
4 is that right?

5 A I'm not sure.

6 Q You're not sure.

7 Do you know that Representative Taylor Greene  
8 of CD 14 commented about adding this addition to CD 14?

9 A No, I'm not aware of that.

10 Q Are you aware that there was a lot of comments  
11 after the map was published from individuals who live in  
12 Austell and Powder Springs about adding Austell --

13 A The only --

14 Q -- and Powder Springs to CD 14?

15 A The only comments I heard were those who spoke  
16 at the committee. So if they came and spoke to the  
17 committee hearings on the bills, that's when I would have  
18 heard any feedback, and there may have been someone who  
19 spoke about that or some people. I don't recall.

20 Q But right now you don't recall any comments  
21 about adding Austell and Powder Springs to CD 14?

22 A I don't. Not specifically.

23 Q Okay. Anything about the composition of CD 14  
24 on the final map?

25 A What do you mean "anything"?



1 Q You heard some comments, right?

2 A Right. If the people that spoke at -- at the  
3 committee meetings would have said, there were those who  
4 spoke about that.

5 Q Do you recall any of those comments that were  
6 at the committee meetings to be about CD 14?

7 A That's what I am saying. If I had heard  
8 anything, it would have been -- it would have been in  
9 those comments, were the only ones that I heard.

10 Q And what were those comments?

11 A That the people in that area did not want to be  
12 in the 14th District.

13 Q Okay. So you have heard that?

14 A I heard that in those meetings, yes.

15 Q Okay. After you heard those comments, did you  
16 have any discussions with the people who were present at  
17 the working group, over the Zoom, about changing the map  
18 to take Austell and Powder Springs out of CD 14?

19 A I don't recall a discussion after that about  
20 that area.

21 Q Were there any discussions about changing  
22 Congressional map after the final map was published?

23 A I don't recall there being discussion about  
24 making changes once that version of it had dropped.

25 Q Okay. So there were committee meetings where



1     there was public hearings about the map, but no changes  
2     were made to the map after those hearings took place?

3           A     So there was an original version, and then  
4     because there was a Congress prop, I think that was  
5     dropped. I can't remember the specifics, but they did, I  
6     think, make some adjustments. It's all kind of a blur to  
7     me now. I don't remember exactly the steps or when it  
8     happened.

9           Q     But the primary amount of the work occurred  
10    before those committee hearings where people talked about  
11    CD 14?

12          A     Right. They happened after the public  
13    hearings, but then after the --

14          Q     There's additional meetings?

15          A     Right.

16          Q     Did you use the information that was included?  
17    Did you -- what did you do with that information that you  
18    heard at the meeting that occurred after it was  
19    published?

20          A     That information, they are speaking to the  
21    members of the committee, and so I -- I work at the  
22    leisure of the members of the committee. So had the  
23    members of the committee requested that I do something  
24    with that information, then I would have.

25          Q     It doesn't seem like they requested anything?



1 A (No oral response.)

2 THE REPORTER: Did you answer?

3 THE WITNESS: Oh, sorry. No.

4 MR. CANTER: Yeah, I'm sorry. I need to do  
5 better about asking you to say yes or no and not say  
6 uh-huh.

7 So I apologize for that, Marcie.

8 Q BY MR. CANTER: Would you agree that the  
9 residents of Austell and Powder Springs did not have an  
10 opportunity to elect candidates of choice -- of their  
11 choice when added to CD 14?

12 A Can you say that one more time?

13 Q Yeah. Would you agree that the residents of  
14 Austell and Powder Springs did not have an opportunity to  
15 elect candidates of their choice after their cities were  
16 added to CD 14?

17 A They would have been able to vote for a  
18 candidate of their choice when they vote. That --  
19 that --

20 Q Sure.

21 A -- is hard to --

22 Q Sure.

23 So would you agree that the residents of  
24 Austell and Powder Springs did not have a likely chance  
25 to elect candidates of their choice once their cities



1 were added to CD 14?

2 A Considering that that area voted 60 percent or  
3 thereabouts for Democratic candidates and then being  
4 drawn into a Republican district, I would agree that it  
5 is more difficult for them to elect a Democratic  
6 Congressperson out of a district that is majority  
7 Republican.

8 Q Do you know that Austell is majority-minority?

9 A I do not know the demographics of the city. It  
10 was my understanding that the entire area that was pushed  
11 in -- that what did you call it, the southeastern?

12 Q The southeast edition, yes.

13 A Right, the southeast edition, that that area  
14 was a diverse area where no -- there was not a single  
15 majority race group, or at least in the voter  
16 registration numbers they were all a diverse area. So I  
17 don't know that it was comprised of one majority race in  
18 that area.

19 Q But you knew when you were at the working  
20 session, that the Southeast addition was a diverse area?

21 A I knew that it was a diverse area, yes.

22 Q Did the other members of the working group know  
23 that it was a diverse area?

24 A I don't know what the other members of the --

25 Q Right.



1 A -- working group knew.

2 Q All right. Did you talk about the composition  
3 of Austell and Powder Springs at all?

4 A I don't specifically remember a conversation  
5 about those two cities.

6 Q Did you talk about the geographic area which  
7 we've been calling the southeast addition at all during  
8 that meeting?

9 A Yes. Definitely the interest was in the  
10 politics of that area and the way they voted.

11 Q Are you aware of whether the residents of the  
12 rural portion of CD 14 said anything about adding Austell  
13 and Powder Springs?

14 A Can you say that one more time?

15 Q Yeah. Are you aware of whether the residents  
16 of the rural portions of CD 14, closer to the  
17 northwestern edge, had any comments about adding Austell  
18 and Powder Springs into CD 14?

19 A I'm not aware.

20 MR. CANTER: The -- how long have we been on  
21 the record?

22 THE VIDEOGRAPHER: 44 minutes, this section.

23 MR. CANTER: Can we do 10 minutes?

24 MR. JAUGSTETTER: Okay.

25 THE VIDEOGRAPHER: The time is 1:40. We are



1 going off the video record.

2 (The deposition was at recess from 1:40 p.m. to  
3 1:56 p.m.)

4 THE VIDEOGRAPHER: The time is 1:56. We are  
5 back on the video record.

6 MR. CANTER: I want to clarify for the record  
7 the exhibit numbers for the documents that I just showed  
8 during the last session.

9 Exhibit 5 will be the zoomed-in map of the area  
10 of Oxford, and Exhibit 6 will be the prior and enacted  
11 Congressional District 14 boundaries.

12 Q BY MR. CANTER: Director Wright, did you speak  
13 with your counsel about the contents of this deposition  
14 during the break?

15 A No.

16 Q Did you speak with anyone else about the  
17 contents of the deposition during the break?

18 A No.

19 Q Can you please go to the enacted Congressional  
20 map. It was Exhibit 2.

21 A 2.

22 Q And can you take a look at CD 13? We spoke a  
23 little bit about CD 13 before because you pointed out  
24 that an area around Douglasville had previously been in  
25 CD 3 and was added to CD 13. Is that correct?



1           A     I think Douglas County had been wholly within  
2     13.

3           Q     Ah. So in the benchmark plan, Douglas County  
4     was wholly in 13?

5           A     Correct.

6           Q     In the September plan, a portion of it that  
7     didn't include Douglasville was added to 13; and then for  
8     the enacted, that portion that now includes Douglasville  
9     was added?

10          A     That sounds correct. Yeah, it changed.

11               MR. CANTER: Okay. I'd like the court reporter  
12     to mark as Exhibit 7 another comparison of two districts.  
13     This time on the left we have the benchmark Congressional  
14     District 13, and on the right we have the enacted  
15     Congressional District 13.

16          Q     BY MR. CANTER: Does that sound right to you,  
17     Director Wright?

18          A     Yes. I haven't looked at it yet, but...

19               (Deposition Exhibit 7 was marked for  
20     identification.)

21          Q     BY MR. CANTER: So yeah, take a second. Does  
22     that look right?

23          A     That looks right.

24          Q     Okay. Now, can you go to the population  
25     summary tables in Exhibit 2 and look at the data



1 reflecting the black population in CD 13.

2 Do you see where I'm looking?

3 A Yes.

4 Q It says that the black population is just  
5 under -- or just over 64 percent of CD 13; is that right?

6 A Yes.

7 Q Do you consider that CD 13 a packed district?

8 A No.

9 Q Why not?

10 A Packing usually is a higher percentage, in my  
11 mind, than 64 percent.

12 Q Okay. So am I understanding that the reason  
13 you think CD 13 isn't packed is because 64 percent black  
14 population isn't enough to constitute a pack?

15 A I don't know that I'd say isn't enough. But  
16 typically, when I have looked at things to question  
17 whether or not that was something that was packed, these  
18 numbers were significantly higher than 64 percent. We  
19 have a lot of districts on our House and Senate maps that  
20 are comparable to that number and note those are not --  
21 we would not consider those to be packed districts  
22 either, so I would not consider that to be a packed.

23 Q If we can go back to the summary table. Right  
24 next to it is the Hispanic population for CD 13.

25 A Uh-huh.



1 Q And that's just over 12 percent.

2 A Yes.

3 Q Now, if you were to combine the black and  
4 Hispanic populations into a single minority coalition,  
5 that would equal about 76 percent Hispanic/black  
6 population in CD 13, right?

7 A Yes.

8 Q Would you consider 76 percent of a -- of a  
9 coalition population to be packing that coalition into  
10 the district?

11 A I have not usually combined race categories  
12 together to consider it a packing or not packing. From  
13 my experience, it's typically been one single race  
14 category.

15 Q Okay. Let's say it was one single race  
16 category.

17 A Uh-huh.

18 Q Would 76 percent of that group be considered a  
19 pack to you?

20 A It would be a high number. It might depend on  
21 what the circumstances were in the area surrounding that  
22 same area. I know that we have had some of our State  
23 House districts that have been around 70 percent of a  
24 single race category, which is high, but they are also  
25 surrounded by other districts that are equally as high.



1           So in order to -- there's not an easy way  
2     without trying to locate population that is not of that  
3     single race category to bring that number down even  
4     lower. So it does depend on other factors.

5           Q     So though it can depend on other factors, would  
6     you say that over 70 percent often reflects a packed  
7     district?

8           A     I think it just depends on the circumstances.

9           Q     In the majority of the time, all else equal?

10          A     I don't know that you could say that, and it  
11     just really does depend on the circumstances.

12          Q     Right. What kind of circumstances would have  
13     to be in place for over 70 percent to constitute a packed  
14     district?

15          A     Well, I just explained to you, if you are in an  
16     area where there are a lot of the same demographic --

17          Q     Yeah.

18          A     -- same single race category, it's very  
19     difficult to find population that is not of a single,  
20     that particular race category, then it's likely that you  
21     are going to see districts that are of that -- of that  
22     level in one race percentage.

23          Q     Yeah.

24          A     And that could be whether it's, you know, 77  
25     percent white population all in one area, or you've got,



1     you know, 72 percent black population, because it's where  
2     they live in one area.

3           Q     So would you say that the diversity of the  
4     geographic space can impact whether a district at 70  
5     percent of a black population is packed?

6           A     Say that one more time. I was following you  
7     and then I --

8           Q     Yeah, sure.

9                     So would you say that the diversity of the  
10    geographic space where you are drawing the district can  
11    impact whether a district that has a 70 percent black  
12    population is packed?

13          A     It could, yes.

14          Q     All right. Would you say that most of the time  
15    under those circumstances, 70 percent constitutes a  
16    packed district?

17          A     Again, I'm not -- I'm not gonna say that  
18    there's a particular number that constitutes a packed  
19    district. It depends on the circumstances.

20          Q     But would 70 percent be pretty high?

21          A     70 percent of one race would usually be a high  
22    number to look at, but that would cause you to want to  
23    look at the other surrounding numbers.

24          Q     Yeah. Unless -- unless you have the  
25    circumstance you described of -- of very high density of



1 a certain race in the geographic area, would you say that  
2 70 percent often looks like a pretty high number?

3 A I said 70 percent can look like a high number  
4 but would cause you to want to look at other  
5 circumstances as to why that district is that high.

6 Q Yeah, sure. Okay.

7 So 70 percent might be -- might be a red flag?

8 A May be.

9 Q It could be a red flag?

10 A Could be.

11 Q All right. What other things could be red  
12 flags that could make you think, oh, this might be a  
13 packed district?

14 A Well, as I've mentioned, you are looking at the  
15 geographic, the area -- the demographics of the area that  
16 surrounds that particular district. In communities, you  
17 are talking about communities that are of interest or  
18 that share common resources, common areas or whatnot, a  
19 lot of times do have the same demographic, you know,  
20 makeup. So it's hard to say, well, should you divide up  
21 a community that people share resources, share schools,  
22 share whatever in the sake of making that number lower.

23 Q Those are some of the factors?

24 A That's some of the things you would consider.

25 Q Any others?



1           A    I have to think about it, but that's definitely  
2 one of the things --

3           Q    Yeah.

4           A    -- to look for and to look at.

5           Q    Okay. Do you remember drawing -- do you  
6 remember drawing CD 13? I know we talked about a portion  
7 of drawing CD 13. Do you remember drawing CD 13?

8           A    Not specifically in detail.

9           Q    Were there any discussions during the working  
10 session about CD 13 in particular?

11          A    I don't recall any.

12          Q    Okay. You can put the document -- those  
13 documents to the side.

14               MR. CANTER: I'm going to hand to the court  
15 reporter what should be marked as Exhibit 8.

16               (Deposition Exhibit 8 was marked for  
17 identification.)

18          Q    BY MR. CANTER: And Director Wright, this is  
19 the enacted Senate map, if you want to take a second to  
20 look at it.

21               Does this look right to you?

22          A    Yes.

23          Q    And we've already talked about this, but do you  
24 remember -- you drew this map?

25          A    Yes.



1 Q All right. And just to make sure I'm  
2 recalling, the process was you drew a blind map, and then  
3 based off directions primarily from Chairman Kennedy but  
4 also from other senators who Chairman Kennedy allowed to  
5 provide directions, you made changes?

6 A Yes, I don't know that I'd say "allowed," but  
7 he spoke with senators and incorporated their feedback.

8 Q Okay. So this is helpful, because my  
9 understanding from your prior testimony was that because  
10 Chairman Kennedy was the author of the bill, he had to  
11 provide permission to anyone who was going to give you  
12 additional directions on how to make changes to the lines  
13 of the map?

14 A Correct.

15 Q Okay. So where am I -- why are you getting a  
16 problem with the "allow"?

17 A Well, he, as I mentioned, later on when it came  
18 back to me, that he met with senators and they opened up.  
19 So any feedback -- because you had asked about how would  
20 he know --

21 Q Yeah.

22 A -- what to do. He had -- he was meeting with  
23 senators away from my office --

24 Q Right.

25 A -- on his own and having conversations, and



1       their feedback, then he could bring to me through --

2           Q     I understand the distinction.

3           A     -- through him.  Yes.

4           Q     Thank you.  Thank you.

5                 Do you see Senate District 17 on this map?

6           A     Yes.

7           Q     All right.  Do you know who is the senator in  
8     SD 17?

9           A     Yes.

10          Q     Who is it?

11          A     Brian Strickland.

12          Q     Do you know Senator Strickland?

13          A     Yes.

14          Q     Do you remember drawing SD 17?

15          A     Yes.

16          Q     Do you remember if anyone provided you  
17     direction about SD 17?

18          A     There was discussion about that particular  
19     district, yes.

20          Q     Can you describe the discussion?

21          A     Yes.  So Senator Strickland is a Republican who  
22     lives in McDonough, in downtown McDonough, and to try and  
23     create a district that he could continue to win, because  
24     he's the chair of judiciary and an incumbent senator.

25          Q     Who did you have these discussions with?



1 A Who did I have these discussions --

2 Q Yes.

3 A -- with?

4 That would have been with Chairman Kennedy.

5 Q So did Chairman Kennedy convey Senator  
6 Strickland's position about SD 17 to you?

7 A I don't know that he conveyed a position about  
8 it.

9 Q Okay.

10 A I think the idea was to draw a district that  
11 would be a Republican district.

12 Q So Chairman Kennedy told you to draw a district  
13 that would allow Strickland to win?

14 A I don't know that it's -- it's hard to bring  
15 out explicit details of conversations because I don't  
16 know that he said that word for word --

17 Q Yeah, I understand.

18 A -- verbatim, but that was the understanding. I  
19 think for all the senators there was, you know, drawing a  
20 district that would allow any incumbent senator to  
21 continue to be reelected was something that they  
22 considered.

23 Q Was there any direction about how Chairman  
24 Kennedy wanted you to draw SD 17?

25 A I don't know if -- if I recall specific



1 guidance from him or if it was one of those collaborative  
2 things that you've mentioned before, working through  
3 the -- the area there, the other counties in that  
4 district that surround it.

5 Q Was SD 17 discussed during the large working  
6 session where you were there in person regarding the  
7 Senate map?

8 A I'm trying to remember if there was a large  
9 working -- I don't think there was a -- not the same kind  
10 of thing.

11 Q Yeah. You mentioned earlier that you met in  
12 person with a number of senators.

13 A Uh-huh.

14 Q That you had your computer up, and that you  
15 were making changes to the map during that discussion.

16 A That was the House.

17 Q That was the House?

18 A Yes.

19 Q So when -- okay. So when you are meeting with  
20 the Senate, you were talking with them, but you weren't  
21 actually making changes?

22 A There might have been times where we did work  
23 and make changes. There might have been other times we  
24 just discussed.

25 Q And what kind of discussions were you having?



1           A    Well, changes -- potential changes to make to  
2   the map.

3           Q    So it was a discussion about how to change the  
4   map, but you weren't at that moment making the changes?

5           A    Could be. I mean, there was many discussions,  
6   many meetings, many work sessions -- I don't know how you  
7   want to define those -- during that time period. I can't  
8   recall one specific instance where we defined how to draw  
9   that particular district.

10          Q    Did you talk about SD 17 more than once?

11          A    Maybe. I don't know.

12          Q    So you are not sure if it was more than three  
13   times?

14          A    I don't know how many times I talked about any  
15   given district. They are all a part of a whole, so when  
16   you work on one district, you are going to impact others,  
17   which is gonna have a chain reaction to others. So it's  
18   hard to say we talked about it X number of times.

19          Q    Yeah. Though, in terms of Representative  
20   Strickland's request to ensure that there would be a  
21   district drawn that he would win, how many times was that  
22   discussed?

23          A    I'm not aware that he made that request,  
24   Senator Strickland.

25          Q    I'm sorry, Senator Strickland.



1           A     But I -- I don't know that he specifically said  
2     that's what he wanted. I don't know if that was  
3     something that the Caucus wanted to do or, of course, it  
4     is a Republican seat, that they would want to maintain.

5           So I don't know exactly where the details of  
6     all of that came to be, but could there be -- could we  
7     draw a district that he could continue to win, and the  
8     map reflects that.

9           Q     It was just -- the information was just  
10    conveyed to you that a map should be drawn that  
11    Strickland -- District 17 should be drawn that Strickland  
12    can win. You don't know exactly where it --

13          A     Right.

14          Q     -- came from?

15          A     I think considering incumbency was something  
16    they were looking at as a whole for all the senators, so  
17    I don't think that was a particular thing to target,  
18    well, we are going -- to target -- to use as him as an  
19    example. They were trying to accommodate all of the  
20    senators, to my knowledge.

21               MR. CANTER: I'm going to project Exhibit 8  
22    through Exhibit Share. So this will be marked as Exhibit  
23    9. Yeah, excuse me, I said Exhibit 8 inaccurately  
24    before. It's Exhibit 9 now.

25               (Deposition Exhibit 9 was marked for



1 identification.)

2 Q BY MR. CANTER: So let me describe this  
3 document to you. This represents the enacted SD 17 and  
4 also the benchmark SD 17. The blue lines reflect the  
5 benchmark SD 17.

6 A Okay.

7 Q The red lines reflect the enacted SD 17.

8 A Okay.

9 Q Does that make sense?

10 A Yes.

11 Q All right. And you will notice that there is  
12 some overlap.

13 A Yes.

14 Q Right?

15 There is also a number of dots in there, right?

16 A Okay. Those are dots.

17 Q Yeah, yeah, they are dots, yeah. And the dots  
18 are color coordinated based off of racial population  
19 statistics.

20 Does that make sense?

21 A Yes.

22 Q So, for example, the blue dots that are in  
23 the -- within the red district but not within the blue  
24 district is new white citizens added into SD 17.

25 Does that make sense?



1 A Yes.

2 Q All right. It looks to me like a lot of white  
3 citizens were added into SD 17. Do you agree?

4 A It's color dots on a map, so I can't tell you  
5 the number of people, but yes, it looks --

6 Q Right. All right. I understand that you are  
7 having to trust that this is an accurate representation,  
8 correct?

9 A That's what -- right.

10 Q So but accepting that, looking at this image,  
11 would you agree that a large number of white citizens  
12 were added into SD 17?

13 A It's hard to tell the density and all, but it  
14 appears that that is the case.

15 Q Okay. If you can take a look at the bottom  
16 left, I'll call it southwest portion of this image, which  
17 reflects the blue lines for the benchmark plan but  
18 doesn't include any of the red map, the enacted plan.

19 Does that make sense?

20 A Say that one more time.

21 Q Yeah. The southwest portion, where its  
22 geographic area that was in the benchmark plan --

23 A Uh-huh.

24 Q -- but not in the enacted plan, right?

25 A Okay.



1 Q Are you looking at the same thing?

2 A I think so.

3 Q It looks to me like this population includes a  
4 lot of Latino voters.

5 A I can't clearly distinguish the coloring  
6 between the green and the orange on the screen, so I  
7 actually didn't realize that that was orange until you  
8 said that.

9 Q Okay. Okay. So you do see -- do you see that  
10 there is a difference between the green dots and the  
11 orange/yellow dots?

12 A Somewhat.

13 Q Okay.

14 A They seem to be blurring together a little bit,  
15 but that helps.

16 Q Is that helpful?

17 A Yeah, that helps.

18 Q Yeah, maybe if you -- I will try to -- oh,  
19 Jesus, I'm sorry.

20 MR. DAVIS: You are good. You can have  
21 control.

22 Q BY MR. CANTER: So do you see the image right  
23 now?

24 A That's better, yes.

25 Q Yeah. So this is the southwest portion we were



1 just talking about. And the yellow dots are Latino  
2 citizens, the green dots are black citizens, and the blue  
3 dots are white citizens.

4 Do you agree that a lot of Latino citizens have  
5 been taken out of SD 17?

6 A It looks to me that there is a broad spectrum  
7 of population. There's a large area of blue. There's an  
8 area of orange mixed with green. There's an area here --  
9 I mean, I wouldn't know exactly what that represented  
10 other than a variety of those different colors.

11 Q Okay. If we can just zoom out again.

12 So a lot of white citizens were added in the  
13 top right portion, and it was a mix of citizens that were  
14 taken out in the bottom left portion. So does it accord  
15 with your understanding of changes to SD 17 that the  
16 district has gotten whiter?

17 A I couldn't speak to the exact demographic  
18 breakdown of what it was to what it is. This was a -- as  
19 I mentioned, this district was about political  
20 improvement, and that is what the number -- that's the  
21 numbers that I was looking at for this particular  
22 district.

23 Q Specifics aside, does it generally accord with  
24 your understanding about changes to the composition of  
25 SD 17, that it's gotten whiter?



1 A That is what it appears to be on here.

2 Q If you can go to the population summary page on  
3 the -- this Senate district map. I don't remember what  
4 exhibit number this is.

5 A 8.

6 Q 8. Exhibit 8. Thank you.

7 And do you see that SD 17 has almost 57 percent  
8 white population?

9 A Yes.

10 Q Do you think that's a lot?

11 A 57?

12 Q Yeah.

13 A I don't know that that's sufficiently a lot.

14 Q Do you think that's enough to ensure that  
15 Senator Strickland can win an election?

16 A That wouldn't have been what I based that on.  
17 I would have looked at the political data to determine  
18 whether or not I thought it was a district that would win  
19 reelection for him.

20 Q What political data?

21 A The same political data we've looked at for  
22 all -- that we pull into the precincts, election data,  
23 election returns.

24 THE REPORTER: Wait. Say that again. Just  
25 start over.



1 THE WITNESS: The same political data that we  
2 have discussed that we brought in from the Secretary of  
3 State's Office that are election returns.

4 Q BY MR. CANTER: Do you recall whether you  
5 looked at data at the county level when determining how  
6 to draw the lines for SD 17?

7 A Can you say that one more time? I'm sorry.

8 Q Yeah. So do you recall whether you looked at  
9 data at the county level when deciding how to draw the  
10 lines for SD 17?

11 A Possibly. I know there is one whole county in  
12 the district, so we probably would have looked at county  
13 data there. The others we would have looked at probably  
14 precinct data because it's divided amongst different  
15 precincts.

16 Q Any other layers?

17 A What do you mean "other"?

18 Q Did you look at block level data?

19 A Possibly, if we had to look at splitting a  
20 precinct. I don't know if he has any split precincts in  
21 this district or not.

22 Q Okay. But you at least looked at precinct  
23 level data?

24 A Yes.

25 Q If you go back to Exhibit 8, do you see a bit



1 above SD 17, there is SD 48?

2 A Yes.

3 Q Did you draw SD 48?

4 A Yes.

5 Q Do you recall drawing SD 48?

6 A As a part of the map as a whole, yes.

7 Specifically, no.

8 Q Do you remember having any discussions about SD  
9 48?

10 A Not -- there were some, yes, but...

11 Q What were the discussions?

12 A So Senate District 48, there was a discussion  
13 about whether that district could be flipped from a  
14 Democratic seat to a Republican seat.

15 Q Do you know who had those discussions with you?

16 A Again, these discussions kind of happened in  
17 a -- not necessarily one on one. There might be a group  
18 discussion or things that had been discussed that are  
19 then brought to me. I don't have a specific conversation  
20 that I can recall.

21 Q Do you recall whether Senator Kennedy, Chairman  
22 Kennedy was part of any discussion about how to change  
23 the composition of SD 48?

24 A Yes.

25 Q Do you know who was the senator in SD 48 prior



1 to the 2022 election?

2 A Yes.

3 Q Who?

4 A Senator Michelle Au.

5 Q Do you know whether Senator Au is a person of  
6 color?

7 A Yes.

8 Q Is she?

9 A She is. I don't know -- she's Asian. I don't  
10 know more specifically.

11 Q Do you think Chairman Kennedy was aware that  
12 Senator Au was elected for SD 48 at the time that the  
13 redistricting was taking place?

14 A Can you say that one more time? I'm sorry.

15 Q Yeah. Senator -- Chairman Kennedy knew that  
16 Senator Au had the seat for SD 48 at that time, right?

17 A Yes.

18 Q And he wanted to get Senator Au out of SD 48?

19 A I don't know that that was exactly the way that  
20 would have been put. It's a difference between wanting  
21 to make a district more Republican versus Democratic than  
22 to say, I want to get rid of someone. I don't think that  
23 was ever terminology I heard.

24 Q That's fair.

25 MR. CANTER: I am going to show on Exhibit



1 Share another document, once it's ready. And this is  
2 going to be Exhibit 10 for the marking.

3 (Deposition Exhibit 10 was marked for  
4 identification.)

5 Q BY MR. CANTER: Just let me know when you see  
6 it, Director.

7 A I can see it.

8 Q Oh, great.

9 A It's far back.

10 Q So Director Wright, this is another map, like  
11 the last one. So the blue lines represent SD 48 in the  
12 benchmark plan, and the red lines represent SD 48 in the  
13 enacted plan.

14 Does that make sense?

15 A Yes.

16 Q All right. And it's the same description on  
17 the bottom where the dots represent the race of different  
18 citizens within the district.

19 Does that make sense?

20 A Yes.

21 Q Would you agree that a lot of white voters were  
22 added to SD 48?

23 A Yes.

24 Q Would you agree that a lot of Latino voters  
25 were taken out of SD 48?



1           A     Yes. It would be helpful if there had been an  
2     overlay of the new Senate District 7, because most of  
3     that area is the new Senate District 7. So it actually  
4     created a new district, that portion. As everything  
5     again shifted upward, that's where the new district was  
6     placed. And it was -- if you look at Exhibit 8, you will  
7     see that on there, but it would have been helpful to have  
8     seen that overlay there as well.

9           Q     Yeah. Yeah, I guess on page 2 -- it's a good  
10    point -- on page 2 of Exhibit 8, you can actually see a  
11    blowup of 48 and 7 --

12          A     7.

13          Q     -- right under it?

14          A     Yes.

15          Q     So --

16          A     So most of that area you are asking me about  
17    that is below the red line, and in that area where there  
18    is a large population of Latino and some Asian -- I can't  
19    see. I think there's green in there. I can't make it  
20    all out -- was part of the population that was used to  
21    create the new District 7 there. That is mostly -- that  
22    is all within Gwinnett, and there's an extremely diverse  
23    district there, as that other district pushes 48  
24    northward.

25          Q     Were you aware -- or, actually, let me ask



1 this. Was Chairman Kennedy aware that adding white  
2 voters to District 48 would cause Senator Au to lose?

3 A I don't believe we discussed adding white  
4 voters in an effort to cause her to lose. We discussed  
5 adding Republican voters in an effort to make that seat  
6 competitive.

7 Q Okay. And how did you seek to accomplish that?

8 A I'm sorry, can you --

9 Q Yeah, sure.

10 A -- rephrase that?

11 Q Yeah. How as the map drawer did you make  
12 changes to Senate District 48 to reflect the goal that  
13 Senator -- that Chairman Kennedy wanted?

14 A Right. So I think in the creation of  
15 District 7 first, once we were able to draw that district  
16 there, which we did, of course, take some of the  
17 population away from District 48 to fit that new district  
18 in Gwinnett, which is a very rapidly growing county, very  
19 diverse county, we created that new seat there, pushing  
20 48 upward.

21 So that then caused us to make decisions about  
22 where do we push District 48, now that it will need to  
23 pick up population, and also to make it a more  
24 competitive political district. That we would have to go  
25 northward, and going northward into Forsyth County and



1 into that area, in the Sugar Hill area, those were some  
2 Republican voting areas that would create -- that make --  
3 make District 48 a more competitive district.

4 Q It looks to me from Exhibit 10 like those are  
5 also -- on the screen, excuse me.

6 A Sorry.

7 Q No, no.

8 It looks to me like on Exhibit 10, that the  
9 northern areas added to Senate District 48 are also --  
10 have a very large white population?

11 A Well, I don't create race density maps like  
12 this, and this is something I have not seen, so this is  
13 your analysis of it. That is not something we use or  
14 look at when we do this, so this is new to me to look at  
15 it like this.

16 Q Okay. Did you draw Senate District 48 while  
17 looking at the precinct level layer?

18 A Yes.

19 Q Did you also look at the block layer while  
20 drawing Senate District 48?

21 A I don't know that I would have looked at  
22 blocks. If I was able to draw that with whole precincts,  
23 I wouldn't have zoomed into the block layer. It's  
24 possible that I did in some of the Sugar Hill area. It  
25 looks like I followed the interstate there, so it's



1 possible I might have used that as a line, as a good  
2 boundary line, but I don't recall specifically using the  
3 blocks.

4 Q Do you recall whether any of -- during any of  
5 the collaborative discussions with more than one senator,  
6 where you and them were talking about how to draw maps  
7 together, do you recall senators from 48 ever coming up?

8 A Do I recall the senator from the 48th at the  
9 time we drew the map?

10 Q Do you recall -- sorry, let me rephrase.

11 You've mentioned that you had a lot of  
12 collaborative discussions about drawing the map, not just  
13 with Senator Kennedy, but with multiple people.

14 A Uh-huh.

15 Q In any of those discussions, did the  
16 composition of 48 come up?

17 A It would have come up at some point, yes.

18 Q Do you remember when it came up?

19 A No, not specifically.

20 Q Do you remember who brought it up?

21 A No.

22 Q Do you remember the context of the discussion?

23 A I think I've already kind of framed that in  
24 terms of we added the new seat into Gwinnett --

25 Q Yeah, okay.



1 A -- which caused then the effect of moving.

2 Q Okay. Do you think new Senate District 48 is  
3 compact?

4 A Yes.

5 Q Going back to the Senate District 17, which you  
6 can see on page 1 of Exhibit 8, do you think Senate  
7 District 17 is compact?

8 A It is not as compact as some districts would  
9 be. Some of that may be in part due to the shapes of the  
10 county lines there that cause it to have a bit of a  
11 jagged appearance, but it is not as compact as other  
12 districts might be.

13 Q Do you recall why Newton County is split  
14 between Senate District 17 and 48?

15 A It had previously been split between them.

16 Q Right. Did you talk about trying to make that  
17 county whole as part of the enacted plan?

18 A I don't recollect a conversation about trying  
19 to make Newton County whole. And both of the senators  
20 who represent it do a lot of work in that county, so  
21 they -- neither of them mentioned trying to give it up.

22 MR. CANTER: How long have we been going?

23 THE VIDEOGRAPHER: 36 minutes.

24 MR. CANTER: I'm going to provide to the court  
25 reporter Exhibit -- what should be marked as Exhibit 11.



1                   (Deposition Exhibit 11 was marked for  
2                   identification.)

3           Q     BY MR. CANTER: Director Wright, this is the  
4           enacted House map. Do you agree?

5           A     Yes.

6           Q     You drew this map?

7           A     Yes.

8           Q     I just want to make sure I remember. Did you  
9           earlier testify that the way you drew this map was that  
10          you drew a blank map, or was that what you called it?

11          A     Blind.

12          Q     Blind map. Excuse me, a blind map.

13          A     I mean, to clarify, meaning there wasn't input  
14          on specifics about the way the map would look.

15          Q     Yeah, I understand.

16          A     Okay.

17          Q     It was all you?

18          A     Well, don't say that. It was using the -- what  
19          the data that we had, the existing map and the numbers in  
20          the population, and referring to that in trying to  
21          shape --

22          Q     Okay.

23          A     -- using all of the redistricting principles.

24          Q     Right. Which we discussed earlier?

25          A     Yes.



1 Q Yeah. Okay.

2 And then Chairman Rich came and provided  
3 direction, either directly to you, or Chairman Rich spoke  
4 to other members of the House and they provided direction  
5 to you through Chairman Rich?

6 A Yes.

7 Q Am I missing anything about people who provided  
8 direction to you about how to draw this House district?

9 A I'm not sure what you mean.

10 Q Are there other people that directed you on how  
11 to draw the House plan that I haven't mentioned already?

12 A Counsel was involved in consulting on -- on the  
13 drawing of the maps as well.

14 Q Anyone else other than your counsel or those  
15 that I've mentioned?

16 A Not that I can recall.

17 Q When you are drawing at the House level, are  
18 you more often looking at the block layer?

19 A It would depend on which part of the state you  
20 were in. In the more rural parts of the state, as you  
21 can see on the map, the districts are larger --

22 Q Sure.

23 A -- and made up of whole counties. So in those  
24 cases, it's probably more county and precinct based in  
25 terms of what you use.



1           As you get into more populated and smaller  
2       areas and much smaller districts, then you would  
3       sometimes -- even then I try to stick to precincts as  
4       much as possible. But only in need of population  
5       balance, when you are trying to close up the deviation  
6       range, would you look at blocks.

7           Q     Why do you try to stay in precincts most often?

8           A     Precincts, it's most helpful to your county  
9       election official. That's how they assign their voters.  
10      So they are -- all voters are assigned a precinct that  
11      they vote at, so when they go in to make changes to  
12      district assignments for their ballot combos, it's pretty  
13      much all of the voters in one precinct. They can give  
14      them all one assignment. It's a much easier process than  
15      having to sort a combo out and determine streets on one  
16      side of a split or another.

17          Q     So all else equal, you don't want to make  
18      changes at the block level?

19          A     We try to avoid that, yes.

20          Q     Yeah. But you have data that could reflect  
21      that, the changes if you need to?

22          A     If we have to do that, yes, we can go block  
23      level.

24          Q     Okay.

25          A     Even at that point, I always try to stick with



1 major features to split a district. It makes it easier.  
2 Street -- major interstate or a street or something.

3 Q Do you recall drawing House District 49?

4 A I recall working on House District 49.

5 Q What do you recall about it?

6 A There was discussion and work in that area of  
7 how to draw those districts there. I think we did draw a  
8 new district that's just below that, the 53rd.

9 Q The 53rd? I see that, yes.

10 A Uh-huh. That was an open seat, so trying to  
11 configure adding an open seat in that area between the  
12 other districts there, and also trying to make them  
13 politically competitive in that area.

14 Q Who was the elected official for House -- the  
15 area where House District 49 is before -- you know, under  
16 the benchmark plan?

17 A I believe that's Representative Chuck Martin.

18 Q Okay. Did you speak with Representative Martin  
19 about the composition of the new House District 49?

20 A I believe I did speak with him at some point.

21 Q What did he say?

22 A I don't remember specifically what he said.

23 Q Generally?

24 A I mean, of course, drawing a district that --  
25 you know, and any member when you are at this level, you



1 are talking about the precinct level, they have precincts  
2 that they have connections to, whether it's family lives  
3 there, a school they went to, they have good support  
4 there, whatnot. So when you discuss those precincts,  
5 they want to make sure those precincts are in their  
6 district if possible.

7 Q Did you discuss with Chairman Rich the  
8 composition of HD 49?

9 A I would expect that she would have been present  
10 with conversations that were had in that area.

11 Q Why?

12 A She was usually present when we met with other  
13 members discussing the districts in certain regions.

14 Q Did the racial composition of HD 49 ever come  
15 up in discussions?

16 A I don't recall that coming up in discussions.

17 MR. CANTER: I'd like to -- I'd like to offer  
18 for marked Exhibit 12 another document on Exhibit Share.

19 (Deposition Exhibit 12 was marked for  
20 identification.)

21 Q BY MR. CANTER: So this is the same type of  
22 image, once you see it on the screen.

23 MR. DAVIS: Can you guys -- is it showing?

24 THE WITNESS: Yeah, I can see it. It's kind of  
25 far back, but if you zoom in, it might cut off.



1 MR. DAVIS: You want me to zoom in?

2 THE WITNESS: It may cut some -- okay. Yeah,  
3 that's good. That's good.

4 Q BY MR. CANTER: So the principles for this  
5 document are the same as the two that we see before. The  
6 blue lines reflect the benchmark of House District 49,  
7 and the red lines reflect the enacted House District 49.

8 Does that make sense?

9 A Remind me one more time. The blue is the old  
10 and the red is the new?

11 Q Yeah. Blue before. That's how I remember it.

12 A Blue before, there you go. Okay.

13 Q Do you agree that a lot of white people were  
14 added into HD 49?

15 A It does look to be that from your image.

16 Q Was a goal of Chairman Rich when drawing the  
17 districts in the House map to retain the core of a prior  
18 district?

19 A I think that was something that was considered.  
20 I don't know that that was something that was focused  
21 heavily upon. Sometimes that's easier in some areas than  
22 others, but it was not the -- not a top priority but  
23 something that was considered.

24 Q When you say it was considered, do you mean  
25 that it was considered as a factor to bake into the



1 drawing or as a factor not to bake into the drawing?

2 A So in a lot of the districts, it's easier to  
3 look at cores of districts where a previous district had  
4 been. From things we've heard, a lot of the people in  
5 the public hearings, you know, wanted to maintain  
6 consistent representation with the -- the representative  
7 or senator that they had had before, so we do try to  
8 consider, if we can try and draw a district in a similar  
9 way, to maintain as much of that as we could, but also  
10 knowing we have to make changes due to growth and  
11 population.

12 In this particular area, in the Metro area, we  
13 know there's been a ton of population growth, so that's  
14 going to involve, of course, in this case, adding a  
15 totally new district that had not been there before. I  
16 think we actually did that in Gwinnett as well. So in  
17 that same region, when you are adding new districts,  
18 there were open seats that -- yeah, well, that one I  
19 think didn't run again. But it does make a difference in  
20 trying to maintain, because the districts don't  
21 necessarily look the same anymore as they move due to  
22 that shifts in population. You can't just always keep  
23 them just as they were.

24 Q Do you think the new HD 49 retains the core of  
25 the benchmark HD 49?



1           A    It retains some of its core.  I mean, there's  
2   obviously overlap in this map.  I don't know particulars  
3   on the value of how much that population is that was  
4   there before.  Obviously, it's -- there's some, but it  
5   did shift.

6           Q    Would you say -- when you said it retained some  
7   of the core, do you think -- would you say that it  
8   retains more than half or less than half of the core?

9           A    That's speculation.  I have no idea.

10          Q    Okay.  When drawing this district, do you  
11   recall whether you looked at precinct level data?

12          A    Yes.  I would most likely have been working  
13   with precincts.

14          Q    Do you recall whether you also looked at block  
15   level data?

16          A    I do not recall specifically looking at the  
17   block level.  They do have some precinct boundaries that  
18   are a little unusual sometimes.

19          Q    Yeah.

20          A    So sometimes you do have to look at that, if  
21   they have non -- they have some noncontiguous pieces --

22          Q    Yeah.

23          A    -- of precincts up there, so you do have to  
24   look at it sometimes.

25          Q    Yeah, if you don't mind, I'm going to try to



1 zoom in on a portion in the enacted, a little -- where it  
2 sort of looks like there's like a person pointing in the  
3 left direction --

4 A Uh-huh.

5 Q -- that's not part of the district. Do you see  
6 that?

7 A Yes.

8 Q Right.

9 Is that one of these areas that you mentioned  
10 that might be a little -- I think you said maybe a little  
11 noncontiguous, is how you put it?

12 A I don't know if that one is noncontiguous.

13 Q Yeah.

14 A That might be part of a city boundary there.

15 Q Okay.

16 A There's a little city of Mountain Park there.  
17 It could be a portion of that. It could be a city limit  
18 from one of the other cities. They do tend to follow the  
19 city limit boundaries for their precincts in that area,  
20 which tends to make them look a little more unusual.

21 Q Okay. Right now you're not sure whether  
22 that's -- that somewhat odd shape reflects a split county  
23 or a split precinct?

24 A I would expect that is a precinct boundary,  
25 because I wouldn't have drawn a split precinct that



1 looked like that.

2 Q Okay. Looking at this document -- and we can  
3 zoom out if that's helpful -- do you see anywhere that  
4 looks like a split precinct?

5 A Without the precincts, it's hard for me to  
6 tell. They're on the exhibit, but it's hard to see  
7 because it's not zoomed in very well either. So I can't  
8 say for sure without having that.

9 Q We can put the Exhibit Share document away.  
10 And if you can go to the Georgia House  
11 District, which I think was marked as --

12 A 11.

13 Q -- 11, thank you. And again, on page 2, you  
14 can see House District 104.

15 Do you see that?

16 A 104?

17 Q Yes, ma'am.

18 A Yes.

19 Q Do you remember drawing House District 104?

20 A Yes.

21 Q Who was the representative of that district?

22 A That would be Representative Chuck Efstration.

23 (Court reporter clarification.)

24 Q BY MR. CANTER: What did you and the  
25 representative discuss -- did you discuss with the



1 representative about HD 104?

2 A I don't recall discussing it with him prior  
3 to -- well, I don't know when I discussed it with him.  
4 There was a time that I spoke with him. I don't recall  
5 if that was before or after the map was in a format that  
6 was presented. I don't remember when it was.

7 Q Did you speak with Chairman Rich about HD 104?

8 A Yes, I believe she would have been involved in  
9 those conversations.

10 Q Were there any conversations with Chairman Rich  
11 that didn't include Representative Efstration?

12 A Efstration. I couldn't say. I'm not sure.

13 Q What did you talk about in terms of the  
14 composition in drawing a new HD 104?

15 A I think that if -- in some capacity, I was told  
16 that 104, of course, they want to ensure that it  
17 maintains as -- oh, it got dark -- a Republican district,  
18 that an electable district for him, and that to draw that  
19 district into Barrow County would be the direction for  
20 that one to move, to pick up population. That would  
21 continue to maintain that district as a Republican  
22 district.

23 Q Just so I understand, were you directed to add  
24 Barrow County into HD 104?

25 A Again, you know, we've talked about this being



1 a collaborative thing. At some point in conversation I  
2 think that was mentioned. I don't remember being, you  
3 know, directly told do this and that was how it happened,  
4 but the discussion was there that taking it into Barrow  
5 County. And I think all of these districts kind of  
6 pushing out a little bit from where they had been because  
7 of the growth in the Metro area, especially in Gwinnett,  
8 them pushing outward is not -- that was sort of the side  
9 effect of the growth in the -- in the area anyway, that  
10 they were going to push out to some degree in some areas.  
11 And so that one pushing into Barrow to pick up Republican  
12 population that votes Republican to ensure that district  
13 to maintain.

14 Q Do you know the racial composition of sort of  
15 the middle of Barrow County?

16 A No, I do not.

17 Q And I appreciate you bringing this up.  
18 You've -- I agree we talked about it and you mentioned  
19 that sometimes you had conversations about how the  
20 composition of lines should be drawn.

21 Ultimately, did you always follow the  
22 directions of Chairman Rich or another member of the  
23 House when drawing the House lines?

24 A So making changes to the map would usually have  
25 been prompted by a discussion with Chairman Rich or



1 counsel on behalf of members or Chairman Rich. It  
2 doesn't necessarily mean that there's a specific  
3 directive on what to do, but it might be an objective, or  
4 try and adjust this here or there, something along that  
5 nature, so that I can then go in as the technician and  
6 look at how to make this fit. Can I --

7 Q Right.

8 A Can it be done, what they are asking, and how  
9 do we -- how do we fit this piece together. So it's not  
10 always so specific to the detail of doing it, but maybe a  
11 framework that they would like to try and see, if that's  
12 possible.

13 Q You were the technician, and if you could  
14 accomplish their request, you would?

15 A Yes.

16 MR. CANTER: I'd like to put up Exhibit 13 on  
17 Exhibit Share.

18 (Deposition Exhibit 13 was marked for  
19 identification.)

20 MR. DAVIS: I'm just going to pull it up.

21 Q BY MR. CANTER: Are you good?

22 A Yes. Thank you.

23 Q This is another one of the -- I think it's  
24 called dot density maps. Have you heard of that term?

25 A Yes.



1 Q Yeah, yeah, okay.

2 Where the blue lines are the benchmark plan --

3 A Uh-huh.

4 Q -- and the red lines are the enacted plan.

5 Would you agree that the new HD 104 adds in a lot of  
6 white persons?

7 A Yes.

8 Q Would you agree that the new 104 has taken out  
9 a lot of Latino persons?

10 A It's hard to see the color things in here, but  
11 can you zoom in?

12 Q Yeah, I'm specifically thinking of the bottom  
13 left quadrant.

14 A There does seem to be a large area of Latino  
15 population in that -- in that area you are circling.

16 Q And just to make sure we're on the same page,  
17 the green dots represent black persons.

18 A Uh-huh.

19 Q Would you agree that HD 104 has taken out a  
20 large population of black persons?

21 A I don't see as much of that green dot on here  
22 as the -- what appears to be the orange. There is area  
23 that it has picked up also that is dense like that, but  
24 again, it's hard to speculate on how many people we're  
25 talking about when I can't -- I don't know the density of



1       that area or how many people that is.

2           Q     Is the inclusion of a large white population  
3       into 104 and the exclusion of a large Latino population  
4       out of 104 consistent with your understanding of how the  
5       new 104 was, in fact, drawn?

6           A     Can you repeat that one more time?

7           Q     Yeah. Is the inclusion of a large white  
8       population into 104 and the exclusion of a large Latino  
9       population out of 104 consistent with your understanding  
10      of how the new 104 was drawn?

11          A     I don't recall having discussions about adding  
12      white population or removing Latino population. I think  
13      the political goal of this district was what the  
14      objective was, to push it into Barrow County.

15                I also know we added some new seats in Gwinnett  
16      that would have pushed that Latino population into  
17      districts where they would have been, you know, a large  
18      portion of those districts in that area as this district  
19      shifted outward. So the political objective, combined  
20      with new districts being drawn, I think that's the  
21      effect, and that's why this district is shaped like it  
22      is.

23          Q     When you drew this district, were you looking  
24      at the precinct layer?

25          A     Yes.



1 Q Do you recall ever looking at the county layer  
2 when drawing this district?

3 A Most of these layers are on at the same time,  
4 so --

5 Q I see.

6 A And when I say I look at the layer, I'm not  
7 necessarily looking at what's in that precinct. I'm  
8 looking at an outline of a precinct or the outline of the  
9 county.

10 Q Right.

11 A I'm not looking at this is the demographics of  
12 a precinct or -- or the way that it votes or any of those  
13 things. I'm just looking at the outlines.

14 Q You are looking at the outline of, say, a  
15 precinct -- a precinct?

16 A Yes.

17 Q Which is how it's manifest on the precinct  
18 layer?

19 A Right.

20 Q And then when you click on that precinct, you  
21 are going to see pop up the demographic data --

22 A No.

23 Q -- related to that?

24 No?

25 A No.



1 Q Okay.

2 A No. With any labeling was on during this, it  
3 might have been the total population in the precinct, so  
4 that I would know whether I needed to gain, you know,  
5 5,000 people or I needed to add 20,000 people to this  
6 district, then I might look at the total of the  
7 population. But when you select that in the pending  
8 change box, it's affecting the entire demographics of  
9 that district, so it doesn't pop up just one --

10 Q I see.

11 A -- precinct at a time. Or even with blocks, it  
12 doesn't pop up and tell me, oh, this block has this  
13 breakdown in it. It doesn't do that. It adds it to the  
14 whole.

15 Q To the whole district?

16 A To the whole, yes.

17 Q Thank you.

18 A So I'm looking at it as a whole.

19 Q Okay. So okay. Yep.

20 Do you recall whether the -- whether you looked  
21 at the block level? Well, I should rephrase.

22 Do you recall whether you made any block level  
23 changes when drawing HD 104?

24 A I don't specifically recall.

25 Q Okay. Do you generally recall whether you made



1 any block level changes when drawing HD 104?

2 A No, I don't recall whether I made any block  
3 level changes probably on a lot of these.

4 Q Okay.

5 A It's a lot.

6 Q You do know that you made some block level  
7 changes?

8 A I'm sure that I did in some places. Like I  
9 mentioned, you know, if there were block precincts that  
10 are noncontiguous, you are going to have block splits  
11 between those two, because you have to.

12 Cobb County is gonna have a lot of block level  
13 work because they have a lot of precinct split,  
14 noncontiguous pieces in islands in their precincts, so  
15 it's -- it's going to happen in certain places that I  
16 have to look at the blocks. But that is, again, I  
17 usually try to work with the precincts to avoid blocks  
18 and let that level of work, if I can avoid that.

19 Q Can you please take a look on page 2 of the  
20 House district document we are looking at right now of HD  
21 48?

22 A Yes.

23 Q Do you recall drawing HD 48?

24 A Yes.

25 Q Who was the representative of HD 48?



1           A    I -- I think that it was representative Mary  
2 Robichaux.

3           Q    Did you ever speak with Representative  
4 Robichaux about the new composition of HD 48?

5           A    No, I did not.

6           Q    Did you ever speak with Representative Rich  
7 about HD 48 -- Chairman Rich, excuse me?

8           A    Yes. I think this area was worked on all  
9 together. So we've talked about 49 and this whole area,  
10 so that would have been as a whole.

11          Q    I believe when we talked about 49, you  
12 mentioned 53. What --

13          A    Yes.

14          Q    Can you elaborate on what you talked about with  
15 48?

16          A    I'm sorry, so 50 --

17          Q    You talked -- when I asked about HD 49, I  
18 recall you talking about HD 53.

19          A    Correct.

20          Q    But now you are saying that you also, as part  
21 of the discussion, were looking at HD 48?

22          A    So we don't draw districts in isolation one at  
23 a time. You are looking at, sometimes it's a county  
24 delegation as a whole. They all -- you kind of have to  
25 work as a group because when you make a change to one,



1 you are going to move another district. So when you  
2 reshape, push one district this way, you are going to  
3 have to fix that here. So you kind of work with all of  
4 them at the same time.

5 So this particular region would have been  
6 something that was looked at as a group, not one district  
7 at a time.

8 Q Were you directed to draw HD 48 in some way?

9 A No, I don't recall being told to draw 48 any  
10 particular way. I actually think that in working on some  
11 of the surrounding districts and then looking at the  
12 political breakdown afterwards, we -- I realized that it  
13 had then become a competitive district. That wasn't  
14 really the goal. It was the effect of working on the  
15 other area.

16 Q Can you take a look at HD 44, on page -- on the  
17 same page?

18 A I see it. It took me a minute, yes.

19 Q Yeah. Do you remember drawing HD 44?

20 A Yes.

21 Q Who was the representative of HD 44?

22 A I'm not certain.

23 Q Okay. That's fine.

24 A I think I know, but I don't want to misspeak,  
25 so I'm not gonna say.



1           Q    I promise I won't get upset if you misspeak.  
2   Who do you think?

3           A    There's a lot of members. We have 236, so I  
4   feel like I'm on the spot when you are asking me who is  
5   in every one of them.

6                   Is that -- is that Don Parsons? Don Parsons.

7           Q    I think that's right. I think that's right.

8                   Did you speak with Representative Parsons about  
9   HD 44?

10          A    I do not recall speaking with him, no.

11          Q    Did you speak with Chairman Rich about HD 44?

12          A    This would have been, again, part of an area  
13   discussion, the districts in that vicinity. So  
14   specifically that one district, I don't recall a  
15   conversation.

16          Q    What were the -- in that area, what were your  
17   priorities? What were you directed to do about drawing  
18   the map?

19          A    There is fairly large growth in that area  
20   around House District 35, and that's the college area.  
21   There's a school there, so there's a lot of growth in  
22   population. That school has really hugely grown in the  
23   last few years, so they've had a lot of change in the  
24   area there.

25                   So in terms of -- that actually, I think, is a



1 change to the districts there, which push some of that  
2 population up into Cherokee as that district there was  
3 formed, 35. And talking about 35, 44, 22, 20, in that  
4 whole area.

5 MR. CANTER: I'd like to put up on Exhibit  
6 Share Exhibit 14.

7 Q BY MR. CANTER: And Director Wright, please let  
8 me know when you see it.

9 (Deposition Exhibit 14 was marked for  
10 identification.)

11 MR. DAVIS: It should be up there now.

12 THE WITNESS: It is. If you can zoom in some  
13 more.

14 Q BY MR. CANTER: You recall from before, this is  
15 another one of these maps where blue is before and red is  
16 after?

17 A Yes.

18 Q Does that sound good?

19 A Yes.

20 Q All right. And the dots -- the colors of the  
21 dots represents the same racial composition of the  
22 benchmark in enacted districts.

23 It looks -- would you agree that a large number  
24 of white voters -- white persons, excuse me, were added  
25 into HD 44?



1           A    This one is hard to see. It looks to be a  
2   pretty disperse spread of different population in there,  
3   because there seems to be a fairly good bit of -- I think  
4   that's Hispanic population in there as well. It's kind  
5   of dispersed between.

6           Q    Okay. Do you think that the new HD 44 retains  
7   the core of the old HD 44?

8           A    As we said before, it retained some of the  
9   core.

10          Q    Okay.

11          A    I don't know how much. I'd have to, you know,  
12   do further digging to tell you how much of the core that  
13   it retains. It does have some. But again, this is  
14   another one of those everything expanding and pushing  
15   outward. This pushed into Cherokee County, and  
16   everything below is pushing the districts that way. So  
17   it did change. It does retain some of the core.

18          Q    Did you ever have a discussion about a  
19   threshold of core retention that would be sort of  
20   satisfactory for the legislators or for anyone else?

21          A    No.

22          Q    So there is no notion of enough core retention?

23          A    Not to my knowledge.

24               MR. CANTER: What time are we at?

25               THE VIDEOGRAPHER: We have been going one hour



1 and seven minutes on this segment.

2 MR. CANTER: Okay. Take 15 minutes; is that  
3 all right?

4 THE WITNESS: Sounds good.

5 THE VIDEOGRAPHER: The time is 3:03. We are  
6 going off the video record.

7 (The deposition was at recess from 3:03 p.m. to  
8 3:25 p.m.)

9 THE VIDEOGRAPHER: 3:25, we are back on the  
10 video record.

11 Q BY MR. CANTER: Hello, Director Wright.

12 A Hello.

13 Q We were talking earlier today about the data  
14 you have for the block layer, and that some of the data  
15 you have is estimates of election results; is that  
16 correct?

17 A Yes.

18 Q Who created that data?

19 A So when we bring that data into our -- it's a  
20 part of our precinct creation. When we make the new  
21 precinct layer -- we do every two years -- we bring that  
22 in. So Rob Strangia in my office is the one who brings  
23 the data in and then allocates it to the Maptitude  
24 software program with the blocks and the precincts.

25 Q And how does he allocate the precinct level



1 data to the blocks?

2 A I'll give you my understanding of it. He  
3 has -- there's formulas he uses to use the registration  
4 data to correspond to what is in the Census block data.  
5 For instance, if you had a precinct that has a hundred  
6 people in it, if you said of those hundred people, 40 of  
7 those people were Asian, and in the Census block  
8 geography you have different Census blocks, and over here  
9 there is no Asian population; over here you see that  
10 there is Asian population, the formula would allocate  
11 those -- the data that goes with those -- that geography  
12 proportionally to the blocks that have the population  
13 based on the registration data that's in that -- in that  
14 file. It's --

15 Q Okay.

16 A He understands it.

17 Q So to make sure I understand.

18 A Yes.

19 Q You use precinct level demographic data, and  
20 with formulas estimate how the political data will appear  
21 on the block level?

22 A Yes. So the voter registration information  
23 that's included in that file helps the matching of the --  
24 or the connection of the data demographically. Political  
25 data is proportional to, you know, the numbers of the



1 blocks. For instance, you might have an industrial area  
2 that's in a precinct. You wouldn't allocate election  
3 returns to the blocks where there is no population. So  
4 they would allocate to the blocks where there is  
5 population. So if you clicked on those blocks, that's  
6 gonna give you -- that's going to be where that is, as  
7 opposed to not --

8 Q Okay.

9 A -- somewhere where there is no population. It  
10 wouldn't make sense for there to be votes there.

11 Q Who made the formula that Rob used?

12 A I don't know.

13 Q Okay. Do you think Rob knows?

14 A I would assume Rob knows. Rob works with it.  
15 He may have been the one who came up with the formulas.  
16 I don't know how that's done.

17 Q It's possible that Rob came up with the  
18 formulas before someone else did?

19 A As far as I know, Rob has done this since I  
20 have been aware of it. So it's probably that Rob came up  
21 with it, but I don't know for sure. He'd have to explain  
22 that process.

23 I actually think he's testified to that before  
24 in other -- in a deposition before, so I don't know if  
25 you have access to find that out, but it's the same



1 process that was used there.

2 Q Okay. The process hasn't changed --

3 A No.

4 Q -- since the last time?

5 A No, it's the same.

6 Q During the period of time after you received  
7 the Census data and before you published all three of the  
8 statewide plans, which just for our purposes right now,  
9 I'm going to call like the redistricting period. Is that  
10 fair?

11 A Sure.

12 Q Yeah. During the redistricting period, did you  
13 get any requests for block equivalency data?

14 A Before maps were produced?

15 Q From the moment that you received the Census  
16 data through the time that the three statewide maps were  
17 published.

18 A I personally don't recall requests for block  
19 equivalency files before maps were produced.

20 Q It was all after the public data -- the public  
21 maps were produced?

22 A Well, yes, during that time period, because, of  
23 course, there were several different drafts.

24 Q Right. So let me -- what I mean by the  
25 redistricting period is the time when you received the



1 Census data until the time when all three of the final  
2 maps were published, so the maps that ultimately were  
3 passed by Governor Kemp became public. So this is after  
4 you --

5 A Can I ask you to clarify what you mean by a  
6 "block equivalency file" to make sure we're on the same  
7 page?

8 Q Yeah. So it's a spreadsheet that request --  
9 that reflects block data.

10 A Like block with a district assignment?

11 Q Correct.

12 A Okay. Just making sure we're talking about the  
13 same thing.

14 So during the process of the draft maps coming  
15 out and being made available, yes, I did receive requests  
16 for block equivalency files.

17 Q From whom?

18 A I know that Shalamar Parham asked for them.  
19 And there -- I don't know if there were other people who  
20 did, but those -- I know she communicated directly with  
21 me. So I don't know if there were others. There may  
22 have been, but I know she did.

23 Q Do you know why?

24 A Do I know why she wanted them?

25 Q Yeah.



1           A    I figured she was going to re-create those in  
2   her software or their office. She worked for the House  
3   Democratic Caucus, so I figured that's what they would be  
4   using them for.

5           Q    Did anyone else ask for block equivalency  
6   files?

7           A    I don't recollect anyone else, but that could  
8   have gone to other staff as well.

9           Q    Other staff you mean in the LCRO?

10          A    Yes.

11          Q    So Mr. Knight?

12          A    It could have -- any requests would come  
13   through our office manager, and then she would hand them  
14   or give them to staff --

15          Q    Okay.

16          A    -- to handle.

17          Q    So it could have gone to Mr. Knight?

18          A    Could have.

19          Q    Could have gone to Mr. O'Connor?

20          A    Could have. I would think if it was an  
21   e-mailed request, it would have been provided already in  
22   the documents.

23          Q    What do you mean by that? Sorry.

24          A    The way the -- all the information that was  
25   discovery, all those documents, if there was a request



1 for that, it would have been in that.

2 Q I see what you mean. We would have received  
3 those?

4 A Yes.

5 Q Okay. But do you know whether or not  
6 Mr. Knight or Mr. O'Connor were asked for block  
7 equivalency data?

8 A I do not know.

9 Q Were you asked for demographic data at any  
10 point during this period?

11 A Beyond what's been made available, or  
12 specifically what do you mean?

13 Q Yeah, beyond -- not including the demographic  
14 data that is associated with a map when it's published,  
15 other bespoke requests for data -- demographic data?

16 A It's possible. I don't have a specific  
17 recollection of any one individual asking for that.  
18 There could have been a request for that, but I don't  
19 know for sure.

20 Q Do you know if Mr. Knight was asked for  
21 demographic data?

22 A I don't know.

23 Q Do you know if Mr. O'Connor was asked for  
24 demographic data?

25 A I don't know that either.



1 Q And when you answer that, is that just within  
2 the redistricting period or is that even after the maps  
3 were published?

4 A Even after. I mean, requests don't come to me  
5 and then to them, so they -- like I said, they come  
6 through our office manager. If someone asks for some  
7 information, it could have been fielded out to anyone in  
8 our office to provide the answer to that.

9 Q You mentioned that Ms. Shalamar?

10 A Shalamar Parham.

11 Q Yeah, Ms. Shalamar asked for block equivalency  
12 data?

13 A Yes.

14 Q Did you give it to her?

15 A Yes.

16 Q Did she have any follow-up questions?

17 A No.

18 Q Can you recall providing block equivalency data  
19 to anyone else?

20 A She's the only particular individual I recall  
21 providing that or asking for that file.

22 Q So generally, do you recall other people asking  
23 for block equivalency data?

24 A What is the distinction in the question?

25 Q Because you said particularly, and so I'm



1     trying to see if you don't have a particular memory of  
2     someone asking it but you remember providing it via  
3     e-mail or via --

4           A     Okay.

5           Q     -- some other form.

6           A     No, I don't remember providing it to anyone  
7     other than her.

8           Q     Okay. Do you have any sort of general  
9     recollection of anyone else in your office, even if you  
10    don't know exactly or remember whom, providing block  
11    equivalency data to anyone else?

12          A     I'm not aware of that.

13          Q     How about demographic data?

14          A     Not aware of that either.

15          Q     No informal requests or anything like that to  
16    your staff for block equivalency data?

17          A     So a block equivalency file is going to be a  
18    digital file, so it would have been in an e-mail. So you  
19    would've seen that in the documents we provided. I  
20    don't -- I don't know if there were any other ones.

21          Q     When you are focusing on the documents that we  
22    were provided, is the point you are making that you've  
23    reviewed those documents, so you know whether it's there  
24    or not, or are you making a different point?

25          A     I'm saying, I have reviewed some of those



1 documents. I don't know that I went through all of them  
2 thoroughly enough. I do not specifically recall anything  
3 I saw, other than I did see the ones where I provided  
4 those to Ms. Parham.

5 I don't know if there is others. I would  
6 assume that you have reviewed them, and if they were  
7 there, you would have seen them.

8 Q Okay. Does Mr. Knight write reports for  
9 legislators?

10 A Can you clarify what you mean?

11 Q You know, as part of his duties at the LCRO,  
12 does he ever write reports related to his duties?

13 A Not that I'm aware of.

14 Q Does he ever provide commentary on sort of  
15 historical data or trends in data for legislators?

16 A Not that I know of.

17 Q He's never done anything like that?

18 A I think he's done white papers before for  
19 members about local redistricting things. As I  
20 mentioned --

21 Q Yeah.

22 A -- that's his area of focus. I don't recall  
23 anything like what you are talking about with historical  
24 trends or things like that.

25 Q And the white papers were on local



1     redistricting?

2           A     Correct. They could have been related to like  
3     city creation, where we've done -- the General Assembly  
4     has taken up some new city legislation. It could have  
5     been about a local redistricting process or something  
6     along that nature.

7           Q     Has Mr. O'Connor ever written reports related  
8     to his work within the office for legislators?

9           A     Can you be more specific on what you mean?

10          Q     Remind me what his role is within the LCRO.

11          A     He's a redistricting data specialist.

12          Q     Right. Okay.

13          A     So he looks at numbers.

14          Q     So as part of his role as the redistricting  
15     data specialist, does he ever respond to inquiries about  
16     historical trends in the demographics?

17          A     It's possible that he has, yes.

18          Q     Does he ever prepare reports on the data and  
19     the demographic information?

20          A     Not in an official capacity. He could be  
21     responding to a request for information, where he might  
22     compile something together and produce that as a part of  
23     a request for something. But an official role, no.

24          Q     Can you think of a report or other sort of  
25     paper that he's prepared even if not in an official



1 capacity?

2 A I think there was some information he gave to  
3 some -- to a reporter at one point, Census information, I  
4 think it was, in a particular format; and then when the  
5 reporter returned to ask for the same thing, I think it  
6 might have been he gave it for the House and he wanted it  
7 for the Senate, and Dan was not there that day, so I took  
8 it and realized that he's compiled something different  
9 than our standard report. And then I just created to him  
10 the standard report to comply with that. It's something  
11 that I -- I don't have -- do just what Dan did, but --  
12 but that kind of thing. He puts -- he's put numbers  
13 together like that for people.

14 Q So Dan put together numbers inconsistent with  
15 sort of the general protocol for the LCRO?

16 A Yes.

17 Q Yeah. When was this?

18 A I couldn't tell you for sure.

19 Q Was it during -- was it soon after the Census  
20 data was published?

21 A I honestly don't remember exactly when it was.

22 Q Okay. In 2021?

23 A I can't even say that.

24 Q Okay. I think you talked about data trend  
25 earlier; is that right?



1 A Uh-huh.

2 Q What did you mean by that?

3 A Growth change in different areas, population  
4 spread in different areas, those kinds of things.

5 Q What do you mean by "growth change"?

6 A So when an area has a massive amount of growth,  
7 population numbers go up, double, sometimes more than  
8 that. You see a significant boom in population in  
9 certain areas. Certain counties might see that. In our  
10 state we've had several counties that have had some rapid  
11 growth over the past 20 years. Those kinds of things.

12 Q Do you know if Mr. O'Connor has ever prepared  
13 materials about trends in the racial composition of the  
14 state of Georgia?

15 A He may have done that in the past. I'm not a  
16 hundred percent sure of what -- what all reports he's  
17 done for people like that, of that nature.

18 Q Do you recall whether he did it during what I  
19 have called the redistricting period?

20 A No. To my knowledge, he did not.

21 Q Did you direct him not to?

22 A Not specifically, no.

23 Q Okay. What makes you say to your knowledge he  
24 did not?

25 A Well, he oftentimes will copy me on requests



1 and reports and things he sends out that are custom, if  
2 they are custom, to see, you know, if -- there are times  
3 I have told him that we try to stick with our standard  
4 reports and not to do custom reports. So depending upon  
5 what the request was for, he might run that through me  
6 beforehand. And so, to my knowledge, he has not done  
7 anything like that.

8 Q You said that he will oftentimes copy you on  
9 requests and reports, so does that mean it happened often  
10 in 2021?

11 A I don't remember it happening often in 2021.

12 Q Do you remember it happening at all?

13 A It -- in my e-mail in 2021, no, I don't  
14 remember him copying me on a data report creation during  
15 2021.

16 Q How about the -- maybe -- maybe softer than  
17 report creation, but did he -- are you aware of anytime  
18 in 2021 Mr. O'Connor accumulating data and providing it  
19 to someone else in a way that, you know, wasn't  
20 necessarily consistent with how your office generally  
21 provides reports?

22 A You're -- 2021 is an entire year. I can't tell  
23 you exactly what Dan did on every project or request he  
24 created during that time period. So no, nothing jumps  
25 out at me --



1 Q Yeah.

2 A -- specifically that he did during that time  
3 period. I don't know.

4 Q Do you -- do you have a recollection of at  
5 least -- and I'm not asking just in 2021, but do you have  
6 a recollection of at least one instance where  
7 Mr. O'Connor generated data outside of the sort of normal  
8 protocols for your office and provided it to someone?

9 A Yes.

10 Q Can you describe that instance to me?

11 A I think you just described it pretty well.

12 Q Okay. Do you know who he provided it to?

13 A I don't even remember who he provided it to  
14 now. That's been quite a few years ago.

15 Q Okay. Do you recall if it was for the  
16 mid-decade redistricting?

17 A I do not recall exactly when that happened,  
18 when it was.

19 Q It could have been after?

20 A After?

21 Q The mid-decade redistricting.

22 A You are talking about 2015?

23 Q Around that, yeah.

24 A It could have been after that, yes.

25 Q Okay. We've talked a lot about Mr. Knight,



1 Mr. O'Connor, and Mr. Strangia in your office.

2 A Uh-huh.

3 Q Am I missing anyone in your office?

4 A Yes.

5 Q Whom?

6 A So we have an office manager, Tonya Cooper. We  
7 have two new staff members that work on local  
8 redistricting, Maggie Wigton -- that's W-i-g-t-o-n -- and  
9 Gabe Mesriah, M-e-s-r-i-a-h. And that's all.

10 Q You've testified that Mr. Knight and  
11 Mr. O'Connor and Mr. Strangia were not involved in  
12 drawing the statewide maps. Is it also the case that  
13 Ms. Cooper, Ms. Wigton, and Mr. Mesriah were not involved  
14 in drawing the three statewide maps?

15 A Correct, they were not involved in it.

16 Q Would you say that in any way were they  
17 involved in drawing the maps? Let me rephrase. Sorry.

18 Was there anything different about how  
19 Ms. Cooper sort of was involved with the statewide map  
20 drawing process than how Mr. Knight and Mr. O'Connor  
21 were?

22 A None of my staff were involved in the statewide  
23 map drawing process.

24 Q So you didn't benefit from the roles and  
25 opportunities of your office manager in preparing the



1 statewide maps? You did it all yourself?

2 A When you say "preparing," I mean, she answers  
3 the phones and --

4 Q Yeah.

5 A -- greets people who come in the office.

6 Q Sure. Sure.

7 A So yeah, that's -- her doing that was helpful  
8 for me.

9 Q Okay. Okay. It's not like she wasn't involved  
10 in that process?

11 A Right. She was involved in greeting people who  
12 came to the office.

13 Q Still people came to your office and they'd  
14 say, oh, hi, Ms. Cooper?

15 A Right.

16 Q I see. Did she have any other type of  
17 involvement other than that?

18 A No.

19 Q Did Ms. Wigton or Mr. Mesriah have any type of  
20 involvement at all?

21 A Ms. Wigton met with a legislator at least once  
22 that I couldn't meet with because I had another  
23 commitment, to look at the maps after they came out, so  
24 that she could let him look closely in, zoom in on the  
25 district as it was proposed for them. I know there was



1 one instance of that.

2 They all -- they could have -- there could have  
3 been other instances of something like that where a  
4 member just wanted to look up close at their map once the  
5 maps came out. That wasn't really in -- much in changing  
6 the map but just looking at the map.

7 Q Do you remember which map it was?

8 A It was the one that was made public, yeah, the  
9 final version.

10 Q Of the Congressional, State Senate, or State  
11 House map?

12 A House, I believe.

13 Q Okay. Do you remember who the representative  
14 was?

15 A Yes.

16 Q Who was it?

17 A Representative LaRiccia.

18 Q Do you remember the district number?

19 A I want to say 169, maybe. Does that sound  
20 right?

21 Q Okay.

22 A Do I get bonus points for all these things I  
23 remember? I think that's the right number.

24 Q Is there anyone else who we haven't discussed  
25 that -- in the broad sense of -- even the broad sense of



1 Ms. Cooper helping, you know, greet people at the table,  
2 in the broad sense you would say sort of participated in  
3 the map drawing process?

4 A I think everyone we've mentioned so far that  
5 you've asked about. Counsel we've talked about. That's  
6 all.

7 Q Yeah. And this is in -- and I'm really trying  
8 not to exclude anything at this point, if that makes  
9 sense, right?

10 A So when you are talking about the map drawing  
11 process --

12 Q Yeah.

13 A -- versus the making the maps public and all  
14 those sorts of things --

15 Q Yeah.

16 A -- I mean, there were, of course, staff that  
17 worked for the IT and other things, that did other things  
18 as far as getting things posted online, and the committee  
19 aides who might have put maps on a wall or, you know.

20 Q Yeah, right. I hear you.

21 A But unless you want all of those people's  
22 names.

23 Q Yeah, understood.

24 You mentioned that you attended the hearings,  
25 the public hearings?



1 A Yes. I --

2 Q (Inaudible.)

3 A -- attended some, yes.

4 Q Excuse me. I didn't mean to interrupt you.

5 A No, go ahead.

6 Q You attended some of the public hearings but  
7 not all of them?

8 A I watched the ones I didn't attend.

9 Q When you attended the hearings, did you ever  
10 participate in them?

11 A We made a video that would have been shown at  
12 the beginning of every public hearing, kind of a  
13 redistricting information video. So if that counts as  
14 participating, I was in the video, then I'll say yes.

15 Q After the maps were published, you mentioned  
16 there was a hearing -- or a committee meeting?

17 A Committee meeting.

18 Q Would that be a better way to explain it?

19 A It's part of the legislative process, yes.

20 Q Okay. So let me -- I'll ask the question  
21 again.

22 After you published the statewide maps, there  
23 was a committee meeting to discuss those maps, or was  
24 there multiple committee meetings?

25 A It's part of the legislative process that those



1 maps are adopted through a bill, and the bill travels  
2 through the legislative process like any other bill, so  
3 it does go to both committees in the House and the  
4 Senate, so...

5 Q I see. Was there a single committee meeting to  
6 discuss all three maps or were they discussed at separate  
7 meetings?

8 A They were discussed at separate meetings.

9 Q Were these meetings public?

10 A Yes.

11 Q Do you recall all the meetings?

12 A Specifically in detail, no. Yet, I know that  
13 they happened and I went to most of them. I'm trying to  
14 think if there was a conflict at one point, maybe, that I  
15 couldn't have been at them, but I was usually at those  
16 meetings. But yes.

17 Q Did you participate in these meetings?

18 A Other than moving maps or pointing out  
19 districts, no.

20 Q Okay. Well, let's talk about -- what do you  
21 mean by "moving maps"?

22 A So they would also want printed copies  
23 sometimes on an easel to have on display, so we would  
24 move those. That's something my office provides. That's  
25 moving maps.



1 Q Okay. And pointing out districts, what does  
2 that mean?

3 A As the chairman would talk through the map and  
4 describe the changes to the districts, literally pointing  
5 the district number.

6 Q Okay.

7 A Where it was on the map.

8 Q Do you ever remember Chairman Kennedy doing  
9 that while he would describe the districts while you  
10 pointed to them?

11 A Yes.

12 Q Do you remember pointing to Senate District 17?

13 A I think I pointed to all 56, so yes.

14 Q All right. Do you know that when you pointed  
15 to Senate District 17, Chairman Kennedy said it was drawn  
16 to retain its core?

17 A I don't specifically recall that.

18 Q Okay. We can pull it up again if you'd like,  
19 but do you think Senate District 17 retained its core?

20 A I think it retained some of it, yes. It had  
21 its parts in Henry and Newton.

22 Q Okay. Changing gears a little bit, do you know  
23 how E-Net operates?

24 THE REPORTER: E-Net?

25 Q BY MR. CANTER: E-Net.



1 A I was about to say, what?

2 Q E, Election-Net.

3 A Do I know how it operates?

4 Q Yeah.

5 A Specifically, no. In general, to some degree.

6 Q Okay. Do you understand that the lines are --  
7 or, I'm sorry, the lines are changed within E-Net by the  
8 local officials?

9 A Yes.

10 Q All right. And you understand that's a process  
11 that they go through to change it?

12 A Yes.

13 Q All right. I understand from the declaration  
14 of Ms. Lynn Bailey at the PI hearing, that part of that  
15 process within E-Net is manual. Do you understand that?

16 A I have never worked with E-Net, so I don't have  
17 any experience --

18 Q Okay.

19 A -- on that.

20 Q Okay. Have you -- do you know what Jarvis is?

21 A No.

22 Q Okay. Do you know that Georgia is trying to  
23 implement a new voter registration system?

24 A Yes.

25 Q Okay. Have you talked about that with anyone?



1 A No.

2 MR. CANTER: I think we can take five. We will  
3 take five.

4 THE VIDEOGRAPHER: The time is 3:51. We are  
5 going off the video record.

6 (The deposition was at recess from 3:51 p.m. to  
7 4:02 p.m.)

8 THE VIDEOGRAPHER: 4:02 p.m., we are back on  
9 the video record.

10 Q BY MR. CANTER: Hello, Director Wright.

11 A Hello.

12 Q During this most recent break, did you speak  
13 with your counsel about the content of the deposition?

14 A Just the timing.

15 Q Did you speak with anyone else about the  
16 content of the deposition?

17 A No.

18 Q Did you speak with Bryan Tyson in preparation  
19 for this deposition?

20 A No.

21 Q Did you speak with Brian Knight in preparation  
22 for this deposition?

23 A No.

24 Q Did you speak with Dan O'Connor in preparation  
25 for this deposition?



1 A No.

2 Q Did you speak with Rob Strangia in preparation  
3 for this deposition?

4 A No.

5 Q I'm forgetting his first name, but did you  
6 speak with Mr. Mesriah in your office in preparation for  
7 this deposition?

8 A No.

9 Q Did you speak with Ms. Maggie Wigton in your  
10 office in preparation for this deposition?

11 A No.

12 Q Did you speak with Ms. Cooper in your office in  
13 preparation for this deposition?

14 A No, I did not.

15 Q Thank you, Director Wright. I have no further  
16 questions.

17 A Thank you.

18 MR. TYSON: Does anyone on Zoom?

19 MR. JAUGSTETTER: Is there anyone on Zoom that  
20 has any questions for Ms. Wright?

21 MR. JONES: This is Mike Jones for the  
22 Pendergrass and Grant plaintiffs. I have just a few.

23 MR. JAUGSTETTER: Okay.

24 >>>

25 >>>



EXAMINATION

BY MR. JONES:

Q All right. Good afternoon, Director Wright.

A Good afternoon.

Q I know it's been a long day, so I will not -- I will not contribute to keeping you here too much longer.

A Thank you.

Q Of course.

Director Wright, have you had the chance to view the illustrative maps that the Pendergrass and Grant plaintiffs served on the defendants in those cases during the discovery phase of those lawsuits?

A I've reviewed some plans. I'm not sure which plans are which cases by name or what they belong to, but I know that I've looked over some that were a part. I'm not sure which -- which ones they were.

Q Okay. And -- and would those have been maps that you viewed in connection with the preliminary injunction proceedings around this time last year?

A Yes.

Q Okay. Have you viewed additional maps generated by plaintiffs in various suits over the last two months?

A Could you clarify if you mean new or different maps from those?



1 Q Yes, ma'am.

2 A No, I have not.

3 Q Okay. Do you have any reason to believe that  
4 you will be called to testify at trial as to your opinion  
5 on the maps submitted by any of the plaintiffs in the  
6 redistricting cases?

7 A Could you state that one more time?

8 Q Sure. Do you have any reason to believe that  
9 you will be called to testify at trial as to your opinion  
10 on the maps generated by any of the plaintiffs in the  
11 redistricting cases?

12 A I'm not sure what I'll be called to do moving  
13 forward.

14 Q Okay. Or do you have any reason to believe  
15 that you will be called to testify at trial on these  
16 maps?

17 A I really don't know.

18 Q So no one has given you -- obviously excluding  
19 any conversations that you've had with your attorney, but  
20 no one has affirmatively provided you with any indication  
21 that they plan to call you to testify as to those maps?

22 A I don't know.

23 Q So you don't know whether anyone has had that  
24 conversation with you?

25 A Oh, I don't know if that is what will happen.



1 No one has had that conversation with me.

2 Q Okay. Has anyone, again excluding any  
3 conversations that you've had with your attorney, has  
4 anyone indicated to you that you will be called to  
5 testify at trial in these redistricting cases regarding  
6 any other matter?

7 A I haven't had any conversations about what I  
8 might be called to do in the future.

9 Q Okay. Thank you very much. I appreciate your  
10 time.

11 A Thank you.

12 MR. JAUGSTETTER: So does anyone else have any  
13 questions for Ms. Wright?

14 MR. SAVITZKY: Hi. This is Ari Savitzky on  
15 behalf of the Alpha Phi Alpha plaintiffs.

16 MR. JAUGSTETTER: Okay.

17

18 EXAMINATION

19 BY MR. SAVITZKY:

20 Q I just -- I will -- I will try to take even  
21 less time than Mr. Jones did, if you don't mind me asking  
22 a question or two, Ms. Wright?

23 A Sure. Go ahead.

24 Q And I will apologize for my voice. I have two  
25 young children at home. The colds are coming in



1 sequence, so...

2 A I understand.

3 Q Yes. I just wanted to ask, you spoke at one  
4 point about communities of interest and how you -- about  
5 how you implement that as a map drawer. And just a  
6 couple of follow-up questions about that.

7 Could a city or town or sort of geographic  
8 community be a community of interest?

9 A It could be if they defined themselves or felt  
10 that they were a community of interest.

11 Q And let me back up for a second. Would it be  
12 fair to say that a community of interest is a community  
13 of some shared interest that's capable of representation?

14 A Are you -- you're saying to define a community  
15 of interest?

16 Q Yeah.

17 A Yes. I think that that's more or less what it  
18 would be, something that has a shared resource or a  
19 shared interest of some sort.

20 Q It could be a shared economic or commercial  
21 interest?

22 A Yes.

23 Q It could be -- I think you mentioned this  
24 earlier, but it could be a connection to a certain, you  
25 know, road or transportation infrastructure?



1           A    Transportation sometimes, but I think more  
2   often than not, communities of interest are sharing  
3   something more, yeah, a little bit more connecting, I  
4   think.

5           Q    It could be a shared interest in a school  
6   system?

7           A    Yes.

8           Q    It could be shared characteristics of people in  
9   a community, folks that work in the same place or have  
10  similar needs?

11          A    Sure. There are a lot of ways to define it, I  
12  think.

13          Q    Would you consider metropolitan or micropolitan  
14  statistical areas, those areas that are defined by the  
15  Census, as potential communities of interest?

16          A    Not really. Those are a little larger than  
17  what I would think of as a community of interest.

18          Q    Okay. And is it possible when you are thinking  
19  about communities of interest, to take into account all  
20  of the different communities of interest that might  
21  possibly exist in an area?

22          A    Could you say that one more time?

23          Q    Is it possible to take into account all the  
24  different communities of interest that you might find or  
25  that might exist in an area or --



1 A Yeah, I think --

2 Q -- on a map?

3 A I'm not sure I'm clearly understanding the  
4 question, but I think there are possible ways where  
5 communities of interest might overlap in certain areas.  
6 It could be because they're different -- there are  
7 different shared interests in a similar area, so it's  
8 very hard to gauge exactly what one might and define as a  
9 community of interest. Because in one case they might  
10 define themselves as that here, and then other people in  
11 that same community might not define themselves as a  
12 community.

13 Q Okay. I don't -- I don't think I have --  
14 actually have any other questions, but thank you so much,  
15 Ms. Wright.

16 A Thank you. Hope you feel better.

17 MR. SAVITZKY: Thanks.

18 MR. JAUGSTETTER: Okay. Anybody else on Zoom?

19 Okay. Anybody else in the room?

20 MR. TYSON: I have some questions. If I can  
21 just grab your microphone.

22

23 EXAMINATION

24 BY MR. TYSON:

25 Q All right, Ms. Wright. Good afternoon.



1 A Good afternoon.

2 Q I don't have quite as few questions as the  
3 folks on Zoom. I do have some questions for you  
4 generally about the process.

5 A Okay.

6 Q And I know it's been, as we said, a long day so  
7 far.

8 Just to get a little bit of background, when  
9 did you first start drawing redistricting maps?

10 A December of 2000.

11 Q So you've been drawing maps over 20 years?

12 A Yes, 22.

13 Q And are those maps all Georgia maps?

14 A Yes. They would be -- I began learning to draw  
15 maps with local redistricting, so mostly for counties and  
16 cities; and then working as that redistricting cycle,  
17 began in some different legislative districts and things  
18 like that.

19 Q How long have you been using Maptitude to draw  
20 maps?

21 A Maptitude is the program we have used the  
22 entire time I have worked in the office.

23 Q Do you have a guess on approximately how many  
24 redistricting plans you have drawn?

25 A I don't have a guess. A lot.



1 Q Okay. And you've -- have you ever served as a  
2 special master for a federal court in map drawing?

3 A I don't know if I've been a special master, but  
4 I've been a technical expert for fed -- for several  
5 federal courts.

6 Q Okay. So I wanted to talk a little bit about  
7 the different redistricting cycles, and I wanted to start  
8 with the 2011 cycle. Were you involved in the 2011  
9 redistricting process?

10 A Yes.

11 Q And do you recall, were there public hearings  
12 held in the 2011 redistricting cycle?

13 A Yes, there were.

14 Q And were those public hearings held before maps  
15 were released to the public?

16 A Yes, they were.

17 Q Okay. And then in the 2011 cycle, were there  
18 public committee meetings?

19 A I think most legislative committee meetings are  
20 public, so yes.

21 Q And there -- there was public comment taken at  
22 those committee meetings?

23 A Yes.

24 Q And do you recall any major differences between  
25 the town hall and committee process from 2011 to 2021?



1           A     Well, as I mentioned earlier, the inclusion of  
2     an educational video, that was actually my idea. I  
3     wanted to provide the people who cared enough to come out  
4     to the public hearings the opportunity to learn a little  
5     bit about the process, rather than just come up and talk  
6     about things without knowing some of the detail or the  
7     reasons why we do this. So that video was a new feature  
8     to add.

9           I also -- I don't know if related to the  
10    hearings, per se, the Zoom platform is new. We didn't  
11    have that before. We have two public hearings on Zoom at  
12    this time. That was definitely not something we did ten  
13    years before. To allow people to not just watch but also  
14    participate from -- from that platform.

15          I think all of the public hearings were  
16    streamed at this time, and I don't know that they were in  
17    2011. They may have been recorded, but I don't know that  
18    they were streamed to be able to watch it live as it was  
19    taking place. So that was new this time.

20          And the comment portal we had on the website  
21    was also a new feature at this time, to allow people to  
22    submit comments, and those comments are actually posted  
23    so that they were viewable throughout the whole process.  
24    I think the comment portal was left up until through the  
25    end of the year, even following the adoption of the maps.



1 And it actually might still be there now. I'm not even a  
2 hundred percent sure if it's still active, but it might  
3 be still active now, not to submit, but to at least  
4 review comments.

5 So all of those things were new in 2021 that we  
6 did not do or have the ability to do in 2011.

7 Q Do you recall if the special session timeline  
8 was similar in 2011 to 2021, the actual time in special  
9 session?

10 A 2011, the special session was in the summer.  
11 It was August, I believe. It was around maybe two, two  
12 and a half weeks. It was a relatively short time period.  
13 I mean, it was, like I said, in the summer. So 2021, we  
14 were in session. Maybe -- I don't know if it was exact.  
15 Maybe a little longer than that or around that time  
16 period, but it was in November as opposed to August, so  
17 much later in the year.

18 Q Okay. What was generally your role in the  
19 redistricting process in 2011?

20 A Similar to what it was this time. I worked on  
21 drawing those maps, worked with the legislators to draw  
22 the -- the statewide maps for the Senate and  
23 Congressional and a large portion of the House map in  
24 2011.

25 Q Did you follow a similar process in drawing the



1 House, Senate, and Congressional plans in 2011 as you  
2 followed and you described in 2021?

3 A Yes, I would say it's a similar process.

4 Q And you were also present in the 2001  
5 redistricting cycle, right?

6 A Yes.

7 Q And do you recall if there were public hearings  
8 in the 2001 redistricting cycle?

9 A Yes, there were.

10 Q Okay. And there were public committee meetings  
11 as well?

12 A Yes.

13 Q Okay. Do you recall that a number of  
14 legislators were paired in the same district during the  
15 2021 redistricting cycle?

16 A Yes.

17 Q And do you recall, were those primarily  
18 Republican members?

19 A There were a significant number of Republican  
20 members that were paired on those maps. The House map  
21 was a multi-member map, so it had districts that  
22 encompassed more than one incumbent in them, and  
23 sometimes more incumbents than even needed to fit in  
24 them. But we only had, I think, 147 districts instead of  
25 180 because of that.



1           Q    So coming forward into -- back into 2021 cycle,  
2   can you just explain briefly about what happens on the  
3   legislative plan -- let me ask this. Do districts move  
4   from one part of the state to another part of the state,  
5   for example, on the Senate plan when you are drawing a  
6   new redistricting plan?

7           A    Yes, they -- they do. Sometimes it's referred  
8   to as collapsing a district. Sometimes I've heard that  
9   terminology. But if there's not enough population to  
10  keep a district in a certain location, then sometimes the  
11  districts surrounding it will take parts of that  
12  district. Then it's relocated and drawn in an area where  
13  there is a lot more population growth on the map. It is  
14  the way -- the way the Senate has bizarre numbering and  
15  doesn't seem to follow a pattern, that's the reason.

16          Q    That's what I was going to ask about. You  
17  mentioned Senate District 7 in your discussion with  
18  Mr. Canter earlier. Where was Senate District 7 before  
19  the 2021 map was drawn?

20          A    Senate District 7 was in south Georgia, kind of  
21  south central Georgia, a little bit close to the Waycross  
22  area and kind of up, and now it's in Gwinnett County.

23          Q    And is a district moving from south Georgia to  
24  north Georgia like that a function of the population  
25  shifts that happen?



1 A Yes.

2 Q So you mentioned it was the -- the districts  
3 moving was the cause of the crazy Senate numbering. What  
4 are you referring to with that?

5 A So traditionally, the Senate districts were  
6 numbered, and starting in the Savannah area where --  
7 that's where our state began and grew from that Savannah  
8 area -- area outward. So the numbers, that's why 1 and 2  
9 are still in Chatham County, and they numbered across the  
10 bottom and then worked their way up.

11 As the state grew, then we weren't able to  
12 maintain those same districts across the southern part of  
13 the state, so the numbers that you see in the Metro  
14 Atlanta area, as we said, they collapsed those districts.  
15 They moved them up into that part of the state, and the  
16 numbering is a little more scattered.

17 We still have -- you know, there is the 50s up  
18 at the top left corner, and the low numbers starting at  
19 the very bottom, but there are a lot of scattered numbers  
20 in between, especially in Metro Atlanta as a result of  
21 that.

22 Q Is the numbering system different for the House  
23 plans?

24 A Yes, it is.

25 Q And how is it different from the Senate?



1           A     Traditionally, we renumber the House plan  
2     following finalizing a map. And it follows a pattern  
3     from the top left, moving towards the bottom right,  
4     trying to, number one, if I can maintain the same  
5     district numbers that were there previously, that does  
6     help with a lot of things in the counties for the  
7     elections, and also for the members. But I renumber to  
8     try and keep delegations in similar numbering patterns  
9     and things like that as it moves through. It's not a  
10    perfect science, but that is traditionally what we do in  
11    the House.

12           Q     So is it unusual for House District numbers to  
13    change for Georgia voters following a Census and a redraw  
14    of the maps?

15           A     No, that's not unusual.

16           Q     You talked to Mr. Canter a little bit about the  
17    political data that you had available and the process of,  
18    I guess, disaggregating or imputing that data to blocks.

19                   Do you recall that?

20           A     Yes.

21           Q     And so is it correct then that if you were  
22    looking at Census block data, each Census block has  
23    political data in it even though it's an estimate, right?

24           A     Right. As you move blocks, you would see a  
25    change in not just demographic data but also in political



1 data as you move those blocks.

2 Q And when drawing the maps, you talked about  
3 different meetings with groups. Let's start with the --  
4 the Senate groups that you met with. Was the political  
5 data for each district an important consideration for the  
6 members when they were drawing the maps?

7 A Yes.

8 Q And for the House maps, was that also -- was  
9 political data also an important consideration?

10 A Yes.

11 Q And for the congressional maps in that  
12 leadership meeting, was political data an important  
13 consideration?

14 A Yes.

15 Q Mr. Canter talked with you about the -- the  
16 different factors of redistricting that the committee  
17 adopted.

18 Do you recall that?

19 A Yes.

20 Q Can you just describe briefly, as a map drawer,  
21 how do you go about trying to balance -- because I'm  
22 assuming there is a competing interest between a lot of  
23 those different factors. How do you go about approaching  
24 balancing those different factors?

25 A It's very difficult, and in certain situations



1 you may have to give on one factor to accommodate another  
2 factor. For instance, maybe population requires that I  
3 have to divide a county because I can't fit this entire  
4 county into this district as it is, and the -- and the  
5 district nearby needs additional population. So although  
6 I would prefer to keep that county whole and intact, I  
7 might have to divide it so that the population is  
8 balanced between the two.

9 But it is a give and take. There is not a  
10 specific method or rhyme or reason as to how you choose  
11 what takes precedence in any given situation. And  
12 sometimes that's driven by what the legislator is asking  
13 for.

14 Q And so it becomes, at some level, a policy  
15 decision of which one the legislator wants to prioritize  
16 in that situation?

17 A Yes, it can.

18 Q Mr. Canter talked with you about using the  
19 different racial data available to you, and Maptitude  
20 will allow you to color a district by the racial makeup  
21 of the population; is that right?

22 A Can you say that one more time?

23 Q Yeah. Let me ask it this way.

24 Does Maptitude allow you to color different  
25 parts of the district by the racial makeup of the



1 population in that area?

2 A You could create a theme that would do that, I  
3 think using the data, whatever field you selected, and --  
4 and setting a theme that way, yes, you could.

5 Q In drawing the House, Senate, and Congressional  
6 plans, did you ever use a theme of racial coloring on a  
7 map?

8 A No, I did not.

9 Q We talked a little bit, too, about discussions  
10 with the House Democratic Caucus. Did you meet with  
11 members of the Democratic party and work on redistricting  
12 maps for members of the Democratic party in the 2021  
13 cycle?

14 A Yes.

15 Q And so those legislators had equal access to  
16 your office if they wanted to come in and draw a map?

17 A Yes.

18 Q And do you recall ever receiving a request from  
19 the House or Senate Democratic Caucus that your office  
20 was not -- did not respond to and provide information in  
21 response to?

22 A Are you asking -- can you say that one more  
23 time?

24 Q Sure. So you mentioned Shalamar -- and I'm  
25 forgetting her last name.



1 A Parham.

2 Q Ms. Parham with the House Democratic Caucus  
3 requesting data. Do you recall ever receiving a request  
4 from Ms. Parham for data that your office did not provide  
5 the data to her?

6 A No, I do not.

7 Q You mentioned as well that you had listened to  
8 all the public comment at hearings, which I know was a  
9 lot.

10 A Yes.

11 Q Did you include items that you heard in public  
12 comment when you were working on the blind maps in the  
13 early drafts of the drawing process?

14 A Yes.

15 Q And what are some examples of those, if you  
16 remember any?

17 A Well, we talked about Pickens County  
18 specifically already. That's definitely something that  
19 was considered.

20 Another example, Montgomery and Toombs County  
21 spoke. There were quite a few people who came to the  
22 hearing there in Macon to talk about keeping those two  
23 counties together. They share a lot of common resources,  
24 and I think one of their cities straddles the county  
25 line, and they requested that they be kept together.



1 I don't know how many examples you want. I can  
2 probably go on. There is quite a few. Even individuals  
3 that had requested certain things, you know, about where  
4 they live or not having their precinct put into a  
5 district that didn't have someone representing it from  
6 their county because they felt like they wanted that  
7 local representation, I was able to accommodate that as  
8 well.

9 Other communities that had goals and things  
10 that they requested, where I could, I would try to  
11 incorporate those into the maps. It's not a perfect art,  
12 but we do try to listen, and I do try to include and  
13 incorporate those things.

14 Q In your 20 years or over 20 years of  
15 redistricting experience, have you ever seen a statewide  
16 map that everybody -- that every voter was happy with?

17 A No.

18 Q I wanted to ask you, you mentioned that  
19 Congressman Bishop had called you as well. Did you  
20 provide any information to Congressman Bishop he  
21 requested or was he just calling to check in?

22 A He actually came to the office, and I met with  
23 him at the office and gave him some information. This  
24 was -- I believe it was before the Census data came out  
25 or right after that but before any maps had been



1 produced, but we did give him some maps of his district  
2 and information.

3 Q Okay. Do you recall any organizations  
4 releasing what were called the "unity maps" during the  
5 course of the special session?

6 A I do recognize that.

7 Q Do you know if the unity maps were ever  
8 introduced by any legislator for consideration by the  
9 legislature?

10 A They would have had to come through my office  
11 to be created into a format to be entered into a bill,  
12 and that would require a legislator to do so. So no, I  
13 never had a legislator bring that file in a format -- in  
14 the format that the committee guidelines spelled out  
15 to -- to create for a bill.

16 Q Ms. Wright, that's all the questions I have for  
17 you. Thank you so much.

18 A Uh-huh.

19 MR. JAUGSTETTER: Okay. If there's nothing  
20 else?

21 MR. DAVIS: Give us two seconds.

22 MR. JAUGSTETTER: Two seconds. Okay.

23 MR. DAVIS: No, nothing else. Not from us, at  
24 least.

25 MR. CANTER: We are good.



1 MR. JAUGSTETTER: All right.

2 THE VIDEOGRAPHER: This concludes the  
3 deposition. The time is 4:26. We are going off the  
4 video record.

5 THE REPORTER: Does anybody on Zoom need a copy  
6 of the transcript?

7 MR. SAVITZKY: Yes, we would like one.

8 THE REPORTER: Did you need a rough draft?

9 MR. JAUGSTETTER: Yeah, please.

10 (The deposition concluded at 4:26 p.m.)  
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1 The following reporter and firm disclosures  
2 were presented at this proceeding for review by counsel:

3 REPORTER DISCLOSURES

4 The following representations and disclosures  
5 are made in compliance with Georgia Law,  
6 more specifically:

7 Article 10(B) of the Rules and Regulations of the Board  
8 of Court Reporting (disclosure forms)

9 OCGA 9-11-28(c) (disqualification of reporter for  
10 financial interest)

11 OCGA 15-14-37(a) and (b) (prohibitions against contracts  
12 except on a case-by-case basis).

13 - I am a certified reporter in the State of Georgia.

14 - I am a subcontractor for Veritext Legal Solutions.

15 - I have been assigned to make a complete and accurate  
16 record of these proceedings.

17 - I have no relationship of interest in the matter on  
18 which I am about to report which would disqualify me from  
19 making a verbatim record or maintaining my obligation of  
20 impartiality in compliance with the Code of Professional  
21 Ethics.

22 - I have no direct contract with any party in this action  
23 and my compensation is determined solely by the terms of  
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15 - Veritext Legal Solutions was contacted to provide  
16 reporting services by the noticing or taking attorney in  
17 this matter.

18 - There is no agreement in place that is prohibited by  
19 OCG 15-14-37(a) and (b). Any case-specific discounts are  
20 automatically applied to all parties, at such time as any  
21 party receives a discount.

22 - Transcripts: The transcript of this proceeding as  
23 produced will be a true, correct, and complete record of  
24 the colloquies, questions, and answers as submitted by  
25 the certified court reporter.

- Exhibits: No changes will be made to the exhibits as  
submitted by the reporter, attorneys, or witnesses.

- Password-Protected Access: Transcripts and exhibits  
relating to this proceeding will be uploaded to a  
password-protected repository, to which all ordering  
parties will have access.



STATE OF GEORGIA                   )  
                                       )       ss:  
COUNTY OF DEKALB               )

I FURTHER CERTIFY that I am in no way related to, nor employed by any of the parties hereto, nor am I in any way interested in the outcome.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

MARCELLA L. DAUGHTRY, RPR, RMR

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1 To: Mr. Patrick Jaugstetter, Esq.

Re: Signature of Deponent GINA WRIGHT

2 Date Errata due back to our offices: 30 days

3 Greetings:

4 This deposition has been requested for read and sign by  
the deponent. It is the deponent's responsibility to  
review the transcript, noting any changes or corrections  
5 on the attached PDF Errata. The deponent may fill out  
the Errata electronically or print and fill out manually.

6  
7 Once the Errata is signed by the deponent and notarized,  
please mail it to the offices of Veritext (below).

8 When the signed Errata is returned to us, we will seal  
and forward to the taking attorney to file with the  
9 original transcript. We will also send copies of the  
Errata to all ordering parties.

10  
11 If the signed Errata is not returned within the time  
above, the original transcript may be filed with the  
court without the signature of the deponent.

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ERRATA for Assignment #5667915

I, the undersigned, do hereby certify that I have read  
the transcript of my testimony, and that

There are no changes noted.

The following changes are noted:

Pursuant to Rule 30(7)(e) of the Federal Rules of Civil  
Procedure and/or OCGA 9-11-30(e), any changes in form or  
substance which you desire to make to your testimony  
shall be entered upon the deposition with a statement of  
the reasons given for making them. To assist you in  
effecting corrections, please use the form below. If  
additional pages are necessary, please furnish same and  
attach.

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14 \_\_\_\_\_Reason\_\_\_\_\_

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16

17

18 DEPONENT'S SIGNATURE

19 Sworn to and subscribed before me, this\_\_\_\_\_day of

20 \_\_\_\_\_, 20\_\_\_\_\_.

21

22

23 Notary Public

24 My commission expires:

25

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**[congressional - coordinator]**

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**[interest - kennedy]**

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.



VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY  
INC., *et al.*,

*Plaintiffs,*

v.

BRAD RAFFENSPERGER,

*Defendant.*

CIVIL ACTION

FILE NO. 1:21-CV-05337-SCJ

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COAKLEY PENDERGRASS, *et al.*,

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:21-CV-05339-SCJ

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ANNIE LOIS GRANT, *et al.*,

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:22-CV-00122-SCJ

**DECLARATION OF GINA WRIGHT**

EXHIBIT

1



Pursuant to 28 U.S.C. § 1746 and F.R.E. 702 and 703, I, GINA WRIGHT, make the following declaration:

1.

My name is Gina Wright. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.

2.

I am the Executive Director of the Legislative and Congressional Reapportionment Office (LCRO), a joint office of the Georgia General Assembly. The LCRO is responsible for providing redistricting services to legislators using data obtained from the United States Census Bureau. The LCRO assists the General Assembly in drawing the districts of the State Senate and State House of Representatives, the Public Service Commission, as well as the fourteen (14) United States Congressional districts. Through sponsorship from a legislator, the LCRO also assists local County Commissions, Boards of Education, and City Councils in adjusting their districts. Finally, the LCRO also provides an array of maps and data reports to both legislators and the public at large.



3.

As Executive Director, I oversee and direct a staff of six (6) in providing redistricting and other mapping services to the Georgia General Assembly. These services may include drawing maps for statewide legislative districts, local redistricting plans, city creation boundaries, annexations and de-annexations, as well as precinct boundary changes. All local redistricting bills through the House Committee on Intragovernmental Coordination require my signature following a technical review of the bill. I am the official state liaison for Georgia for the 2020 Census Redistricting Data Program. I oversee the creation of our statewide voting precinct mapping layer through my work with all county election officials throughout the state. I assist the Office of the Attorney General in candidate qualification challenges related to issues regarding a candidate's residency.

4.

I regularly assist federal courts as an expert or technical advisor in redistricting matters. I participate in the Redistricting and Elections Standing Committee of the National Conference of State Legislatures and contribute to their databases and publications. Finally, I participate as a presenter in statewide forums such as the The Georgia Association of Voter Registrars and Elections Officials Association, the



Georgia Municipal Association (the “GMA”), the Association of County Commissioners in Georgia (the “ACCG”) and the Georgia Legislative CLE class.

5.

I began work with the LCRO in December of 2000 as a Redistricting Services Specialist. I became Executive Director of the LCRO in June 2012. I am a 2000 summa cum laude graduate from Georgia State University. I have a Bachelor of Arts degree in Political Science and a minor in Spanish.

6.

I have been appointed as an expert or technical advisor for redistricting by federal courts in the following cases:

- *Ga. State Conf of the NAACP v. Fayette County Bd. of Comm’rs*, 996 F. Supp. 2d 1353, 1359 (N.D. Ga. 2014) (appointed as the Court’s “independent technical advisor.”); *see also Ga. State Conf of the NAACP v. Fayette County Bd of Comm’rs*, 118 F. Supp. 3d 1338, 1340 (N.D. Ga. 2015) (“Court-appointed expert or technical advisor.”)
- *Crumly v. Cobb County Bd. of Elections & Voter Registration*, 892 F. Supp. 2d 1333, 1344 (N.D. Ga 2012) (appointed as the “Court’s technical advisor and consultant.”)



- *Martin v. Augusta-Richmond County*, 2012 U.S. Dist. LEXIS 85113, \*2-3 (S.D. Ga 2012) (appointed by Court as “advisor and consultant.”)
- *Walker v. Cunningham*, 2012 U.S. Dist. LEXIS 178337, \*5 (S.D. Ga. 2012) (appointed by Court “as its independent technical advisor.”) (3 judge panel).
- *Bird v. Sumter County Board of Educ.*, CA No. 1:12cv76-WLS (M.D. Ga. 2013) ECF 70 p. 5 (appointing Gina Wright as the Court's “independent technical advisor.”)
- *Adamson v. Clayton County Elections and Reg. Bd.*, CA No. 1:12cv1665-CAP (N.D. Ga. 2012), ECF 23 p. 2 (appointing Gina Wright as the Court’s “independent technical advisor.”)

In the past several years I have testified, either at trial or by deposition, in:

- *NAACP v. Kemp*, CA No. 1:17cv1427 (N.D. Ga.) (3 judge court) (consolidated with *Thompson v. Kemp*).
- *Ga. State Conf. of the NAACP v. Fayette County Bd. Of Comm’rs*.

7.

I am not being compensated separately for my work in this matter.

8.

In preparing my analysis, I considered the following facts and data: block equivalency files of five redistricting plans: one state Senate plan by William Cooper



in Alpha Phi Alpha called ILLUSTRATIVE\_PLAN\_2\_BEF\_Senate; one state House plan by William Cooper called ILLUSTRATIVE\_PLAN\_2\_BEF\_HOUSE; one Congressional plan by William Cooper called Pendergrass v. Raffensperger Illustrative\_Plan Modified\_Districts Block Equivalency; one state Senate plan by Blakeman Esselstyn called Grant v. Raffensperger Illustrative Plans Shapefile; and one state House plan by Blakeman Esselstyn called Grant v. Raffensperger Illustrative Plans Shapefile. I also relied on the 2020 PL-94-171 Census Data and Geography files for the state of Georgia; past state House, state Senate, and congressional district maps for the state of Georgia maintained by my office; the 2020 enacted plans for state House, state Senate, and Congress; precinct data from our office on voter registration; and my personal knowledge of the facts regarding redistricting in Georgia. In preparation for rendering my opinions, I reviewed the entire plans.

## 9.

Based on my analysis, the districts discussed below in the remedial plans do not comply with traditional redistricting principles, in some districts unite disparate communities in Georgia solely on the basis of race, and would cause significant changes from the 2020 enacted plans if used as remedial plans by a court. My



analysis is explained below and I reserve the right to add to this analysis if called on to testify further.

### **Cooper State Senate Plan**

10.

The Cooper State Senate plan adds majority-Black districts using the any-part Black voting age population Census metric when compared to the adopted House plan. Six of the new districts created in the Cooper State Senate have Black voter registration of less than 50%.

11.

The proposed District 23 unites disparate communities apparently based on race. The district barely crosses 50% any-part Black voting age population and only achieves that number by connecting Black voters in Augusta with Black voters in Milledgeville and Warner Robins. District 23 as drawn is below 50% on Black voter registration. There is no basis to connect Augusta with Warner Robins in a Senate district if not for the race of the individuals in the districts. The proposed District also adds minority population to District 22 and takes it far outside its traditional boundaries in Richmond County.

12.



The proposed District 28 splits multiple counties with the goals of achieving majority black status. It unites areas of Jonesboro with areas south of Griffin, apparently for the purpose of including the Black population in Griffin. This split Spalding County into two districts, where it is currently not split. Further, creating District 28 results in connecting Jonesboro to the eastern side of Spalding in District 44. This also bears no connection to any type of a community. Coweta County was previously, the new district configuration will result in the division of Coweta County into three districts (16, 35 and 29) which are apparently based on race. I cannot identify a reason for drawing District 28 aside from a purely racial goal. District 28 also has a Black voter registration of less than 50%.

13.

The proposed District 17 connects the black population in Stonecrest to the Ola and Lake Dow communities in Henry County. Stonecrest shares few if any characteristics with the Ola and Lake Dow communities in Henry County and I cannot identify any community of interest that supports the creation of this district. It also splits a large neighborhood in Lake Haven with no apparent reason for doing so.



14.

In short, the additional districts this plan proposes appear to be drawn based on race.

### **Cooper State House Plan**

15.

The Cooper state House plan adds a number of majority-Black districts, including Districts 73, 110 and 144, using the any-part Black voting age population Census metric when compared to the adopted House plan.

16.

The proposed District 73 uses Black population in south Clayton and combines those with Black population in Griffin to create a district. It creates significant changes to surrounding Districts like 78 and 109 by connecting communities that share little to no common interests. Clayton County's boundary was respected in both the adopted House plan and the Democratic House proposal. This new District 73 and its surrounding districts break county boundaries in apparent service of a racial goal.

17.

Nearby District 110 barely goes over a majority district by combining Black population in Griffin with parts of Locust Grove in Henry County. Spalding County



has traditionally only had two House districts but this configuration would result in four districts within the county boundaries (73, 110, 129 and 130). As a result of creating District 110, the Cooper Plan revises District 111 in a way that that splits a number voting precincts with no apparent goal other than to create a majority black district. Similarly, the configuration of District 129 is spread among five counties. I have not separately analyzed incumbents, but am aware of a number of incumbents in this area who could be affected.

18.

District 144 unites disparate communities in a single district. It uses Black population in the cities of Eatonton and Milledgeville and the counties of Hancock and Wilkinson to achieve a district that is barely over 50% any part Black voting age population. District 144 further divides Twiggs and Wilkinson counties into different districts; they have historically been in the same district as they constitute a single community of interest. The districts drawn in the adopted House plan in the same area respect county boundaries and communities of interest and avoid the unnecessary division of counties for racial purposes as Cooper's District 144 does.

19.

Southwest Georgia was a significant challenge because it was the area of the state with the most underpopulated districts. The Cooper plan's reconfiguration of



the area, specifically District 138, results in multiple split counties and connecting areas that have nothing in common, like Columbus, Americus and Junction City or Thomasville and Albany. I cannot identify a community of interest or purpose for configuring southwest Georgia as this plan does; it also appears to pair additional incumbents. Further, the plan does not address some public comments like reducing the number of splits in Tift County.

### **Esselstyn State Senate Plan**

20.

The Esselstyn Senate plan also adds majority-Black districts above the adopted Senate plan when using the any-part Black voting age population Census metric.

21.

District 23 divides Baldwin County, Greene County, and Wilkes County, and still only achieves 50.43% AP Black VAP. It is below 50% Black voter registration. It shifts the district significantly west instead of keeping it an east Georgia District. Given the low Black VAP, the specificity of the splits, and the shape of the district, it appears to be drawn with a racial goal in mind.



22.

District 28 is made up of parts of four counties, Fulton, Coweta, Fayette and Clayton and includes parts of Riverdale in Clayton County and Newnan in Coweta County. Riverdale and Newnan have little in common and do constitute a community of interest.. This configuration splits Clayton County into four districts in a manner that make no geographic sense apart from a racial goal. Clayton County has traditionally been split into two districts; this plan would split the County into four districts.

23.

District 25 is at least more compact, but strategically connects pieces of south Clayton with Henry apparently in service of a racial goal. The side effect of making a compact District 25 impacts nearby Districts, including District 10 not being a community of interest, reaching all the way up to Stonecrest in the north and down to the Butts-Monroe County line in the south. I cannot imagine a non-racial purpose in creating this district.

### **Esselstyn State House Plan**

24.

The Esselstyn House plan adds majority-Black districts above the adopted House plan when using the any-part Black voting age population Census metric.



25.

District 149 splits Baldwin County three ways, and barely reaches 50%-- crossing that threshold by two-hundredths of a point. The three-way division of Baldwin makes no sense and is not at all compact. Further, connecting a small portion of Milledgeville with Macon in a single House district lacks any coherent community.

26.

District 145 is relatively compact, but a side effect of this configuration requires significant changes to the configuration of north Macon, placing parts of Macon together that encompass separate communities. This configuration of Bibb County significantly divides the minority population in the central part of the county and goes directly against the public testimony that was provided during the Macon Town Hall meeting conducted to receive public comment regarding the General Assembly's redistricting efforts.

27.

Districts 74 and 117 suffer from the same problems I outlined above regarding Cooper House District 73 and 110. Districts 74 and 117 are both below 50% Black on voter registration. It is also unusual that District 116 follows the interstate except



to take a single precinct across the interstate that likely has racial implications for District 117.

28.

District 64 only achieves minority status by connecting communities in Fulton County with communities in Paulding County. It is below 50% Black on voter registration and pulls District 66 below 50% Black on voter registration. The configuration of District 61 also runs an extremely long distance connecting East Point and parts west of Douglasville, which would not be a community of interest.

### **Cooper Congressional Plan**

29.

I cannot explain the decision to take District 6 into Fayette County. The district is below 50% Black on voter registration and only barely over the 50% threshold on any part Black. District 6 specifically grabs Black voters near Acworth and Kennesaw State University to connect them with other Black voters in South Cobb, Douglas, and Fulton Counties. Likewise, District 13 reaches into Newton County in an unusual way that cannot be explained by normal redistricting principles. The divisions of Cobb, Fayette, and Newton Counties do not make sense as part of normal redistricting principles and I can only conclude that the drawing of this district in service of some kind of specific goal.



30.

I reserve the right to continue to supplement this report in consideration of additional facts, testimony, or materials that may be produced.

[Signature on next page]

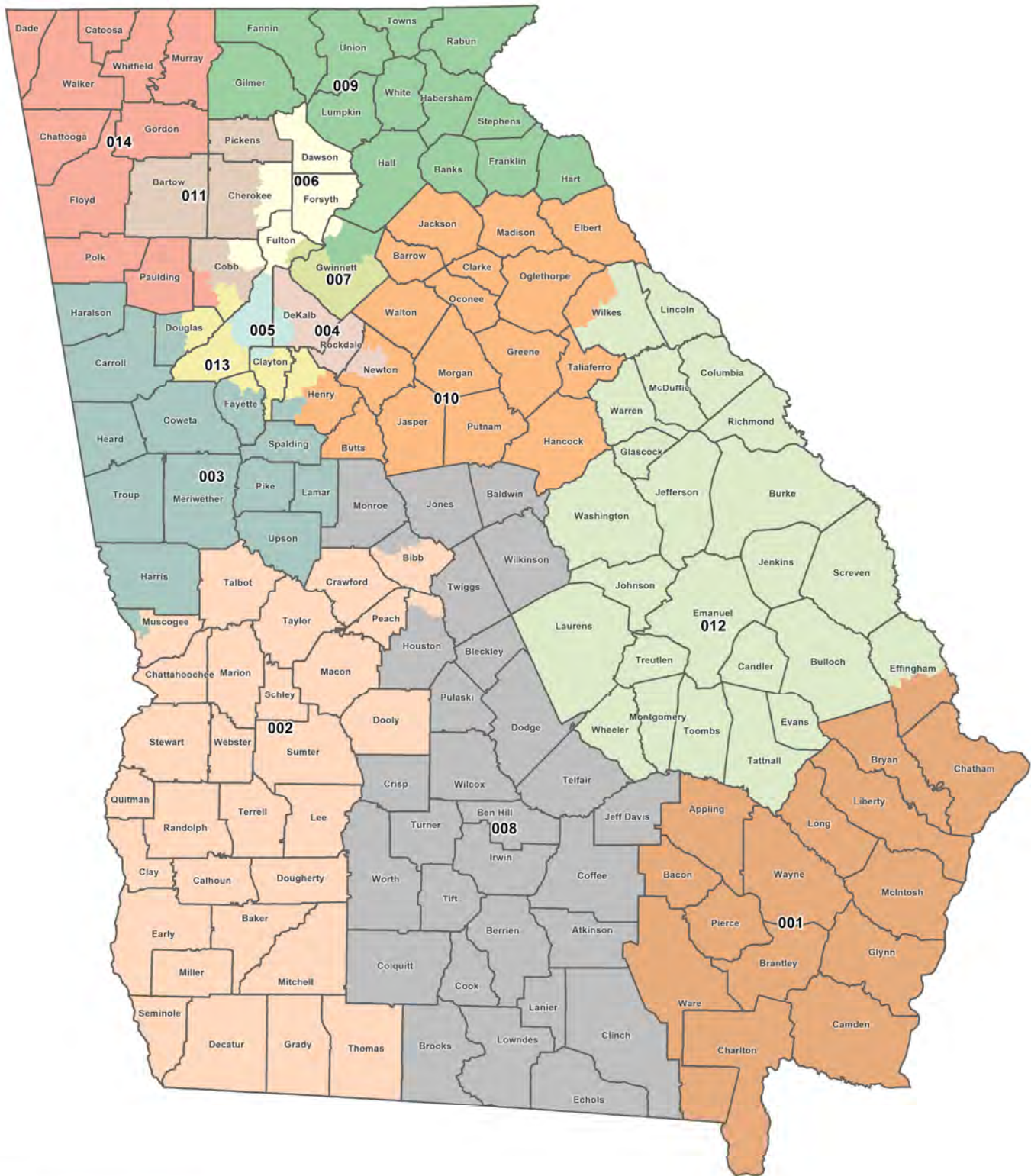


I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of February, 2022.

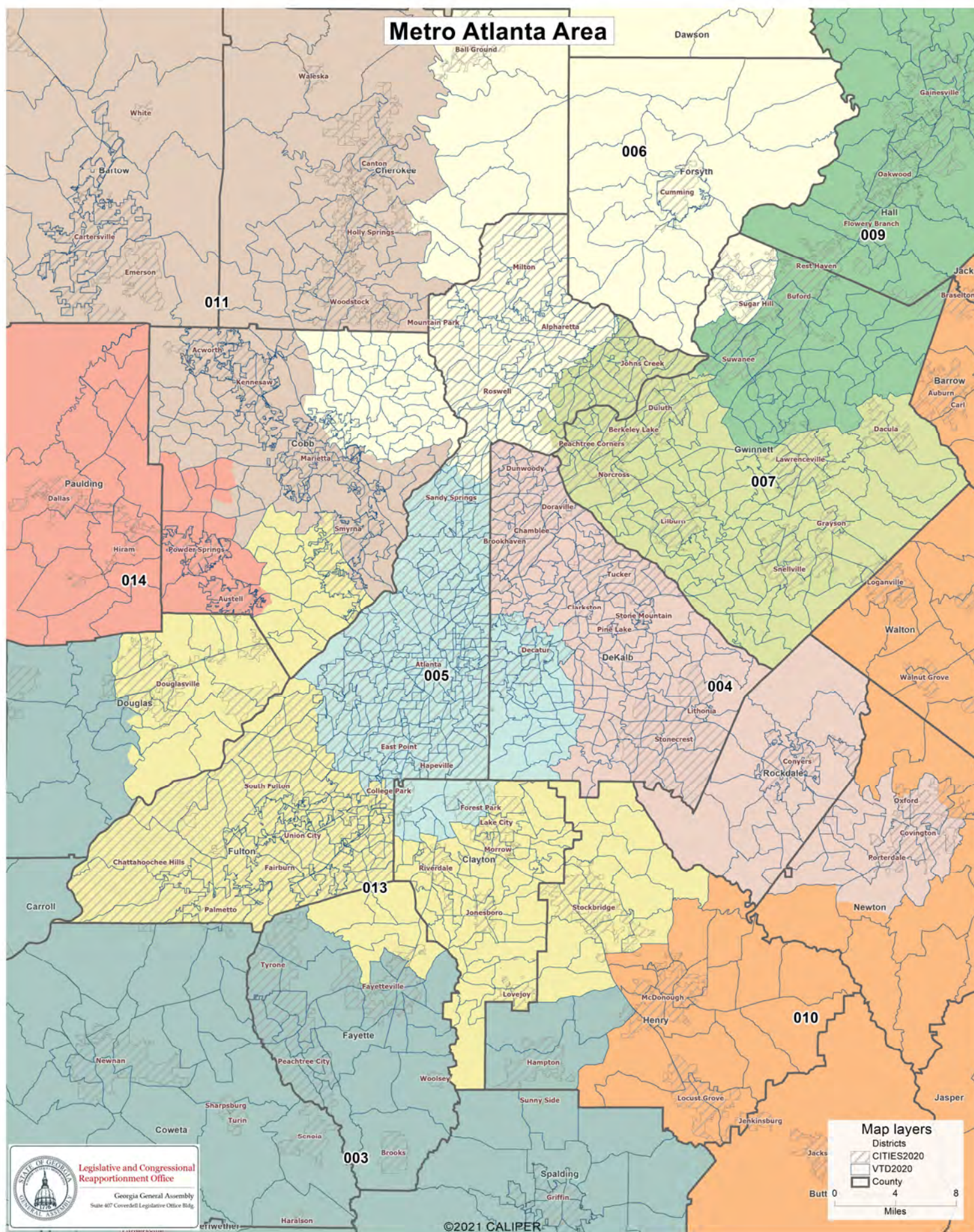
  
GINA WRIGHT



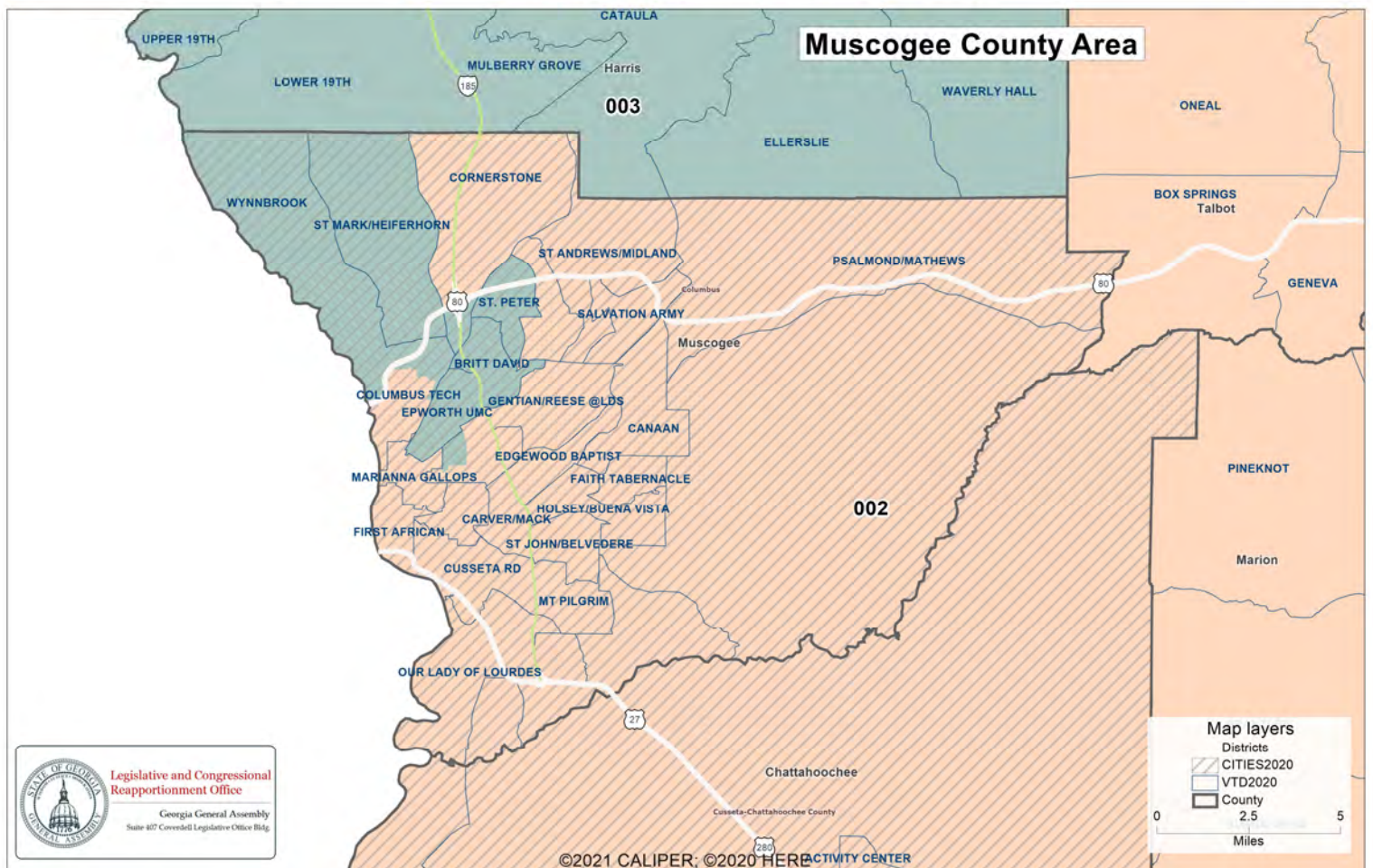
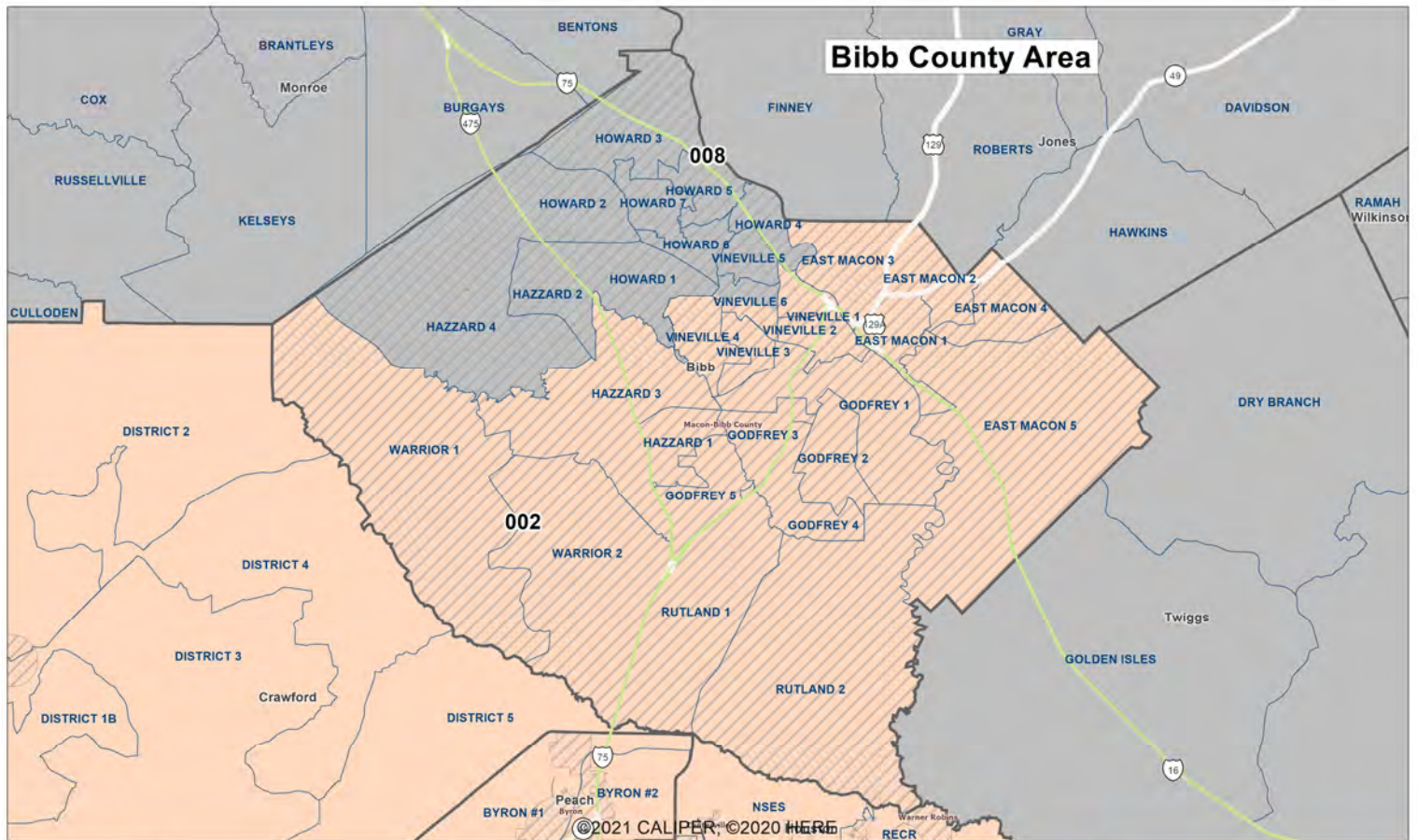
**Congressional Districts of Georgia- 2022**



## Metro Atlanta Area





**Congressional Districts of Georgia- 2022**

Legislative and Congressional  
Reapportionment Office  
Georgia General Assembly  
Suite 407 Corbett Legislative Office Bldg.



User: State

Plan Name: Congress-prop1-2021

Plan Type: Congress

## Population Summary

### Summary Statistics:

Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.71
Relative Mean Deviation:	0.00%
Standard Deviation:	0.80

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	765,137	1	0.00%	589,266	77.01%	57.59%	27.54%	7.75%	2.19%	0.24%	0.16%	0.44%	4.1%
002	765,137	1	0.00%	587,555	76.79%	39.94%	49.03%	5.95%	1.34%	0.21%	0.1%	0.34%	3.09%
003	765,136	0	0.00%	586,319	76.63%	64.37%	22.61%	6.31%	2.09%	0.21%	0.04%	0.47%	3.91%
004	765,135	-1	0.00%	589,470	77.04%	25.82%	52.19%	11.63%	6.13%	0.16%	0.04%	0.65%	3.39%
005	765,137	1	0.00%	621,515	81.23%	35.79%	48.53%	7.38%	4.09%	0.16%	0.04%	0.52%	3.49%
006	765,136	0	0.00%	574,797	75.12%	63.7%	8.58%	10.23%	12.4%	0.16%	0.04%	0.69%	4.21%
007	765,137	1	0.00%	566,934	74.1%	29.52%	28.11%	23.77%	14.26%	0.16%	0.04%	0.69%	3.45%
008	765,136	0	0.00%	585,857	76.57%	57.91%	29.72%	7.17%	1.56%	0.19%	0.05%	0.31%	3.09%
009	765,137	1	0.00%	592,520	77.44%	64.7%	9.72%	15.39%	5.95%	0.2%	0.04%	0.42%	3.59%
010	765,135	-1	0.00%	588,874	76.96%	63.58%	22.12%	7.66%	2.26%	0.17%	0.04%	0.53%	3.63%
011	765,137	1	0.00%	595,201	77.79%	61.33%	16.33%	13.04%	3.76%	0.19%	0.04%	0.82%	4.49%
012	765,136	0	0.00%	588,119	76.86%	52.13%	36.12%	5.63%	1.83%	0.21%	0.11%	0.36%	3.61%
013	765,137	1	0.00%	574,789	75.12%	16.35%	64.26%	12.23%	3.17%	0.18%	0.05%	0.66%	3.1%
014	765,135	-1	0.00%	579,058	75.68%	68.07%	13.58%	12.69%	1.14%	0.22%	0.05%	0.4%	3.85%

**Total:** 10,711,908

**Ideal District:** 765,136



User: State

Plan Name: Congress-prop1-2021

Plan Type: Congress

## Population Summary

### Summary Statistics:

Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.71
Relative Mean Deviation:	0.00%
Standard Deviation:	0.80

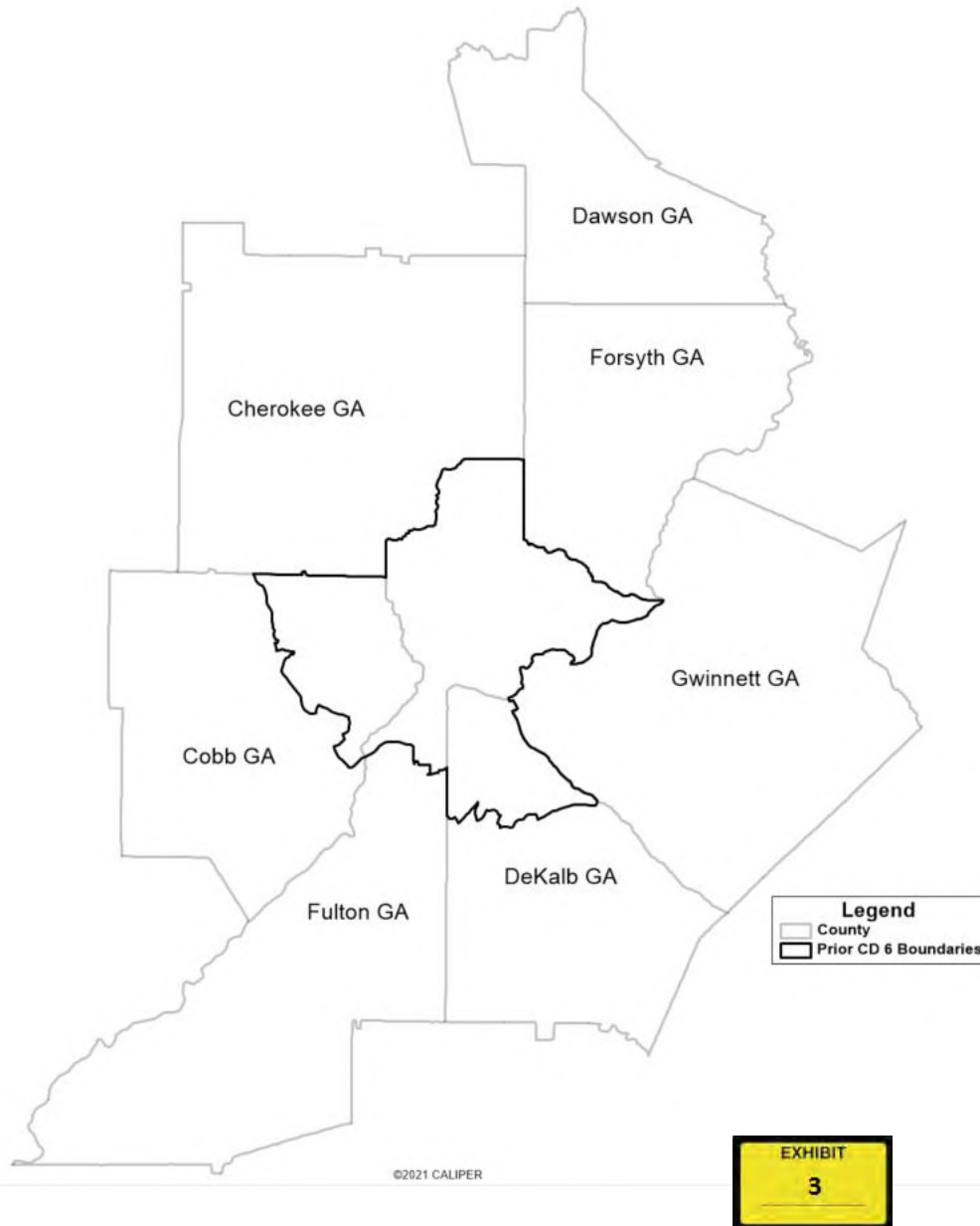
District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	765,137	1	0.00%	589,266	77.01%	60.41%	26.44%	6.78%	2.36%	0.26%	0.14%	0.37%	3.24%
002	765,137	1	0.00%	587,555	76.79%	42.73%	47.62%	5.12%	1.41%	0.23%	0.09%	0.28%	2.53%
003	765,136	0	0.00%	586,319	76.63%	66.83%	22%	5.33%	2.08%	0.22%	0.04%	0.38%	3.11%
004	765,135	-1	0.00%	589,470	77.04%	28.25%	51.79%	10.12%	6.09%	0.16%	0.04%	0.58%	2.96%
005	765,137	1	0.00%	621,515	81.23%	37.92%	47.14%	6.67%	4.53%	0.16%	0.04%	0.48%	3.07%
006	765,136	0	0.00%	574,797	75.12%	66.63%	8.61%	9.11%	11.44%	0.14%	0.04%	0.63%	3.41%
007	765,137	1	0.00%	566,934	74.1%	32.78%	27.35%	21.27%	14.97%	0.16%	0.04%	0.59%	2.85%
008	765,136	0	0.00%	585,857	76.57%	60.52%	28.84%	6.1%	1.6%	0.2%	0.05%	0.25%	2.43%
009	765,137	1	0.00%	592,520	77.44%	68.29%	9.37%	12.89%	5.94%	0.21%	0.03%	0.34%	2.92%
010	765,135	-1	0.00%	588,874	76.96%	66.2%	21.34%	6.51%	2.3%	0.19%	0.03%	0.46%	2.98%
011	765,137	1	0.00%	595,201	77.79%	63.99%	16.25%	11.22%	3.82%	0.2%	0.04%	0.75%	3.73%
012	765,136	0	0.00%	588,119	76.86%	54.65%	35.06%	4.87%	1.95%	0.22%	0.1%	0.3%	2.86%
013	765,137	1	0.00%	574,789	75.12%	18.82%	63.75%	10.52%	3.38%	0.19%	0.05%	0.61%	2.68%
014	765,135	-1	0.00%	579,058	75.68%	71.33%	13.14%	10.58%	1.17%	0.23%	0.04%	0.32%	3.2%

**Total:** 10,711,908

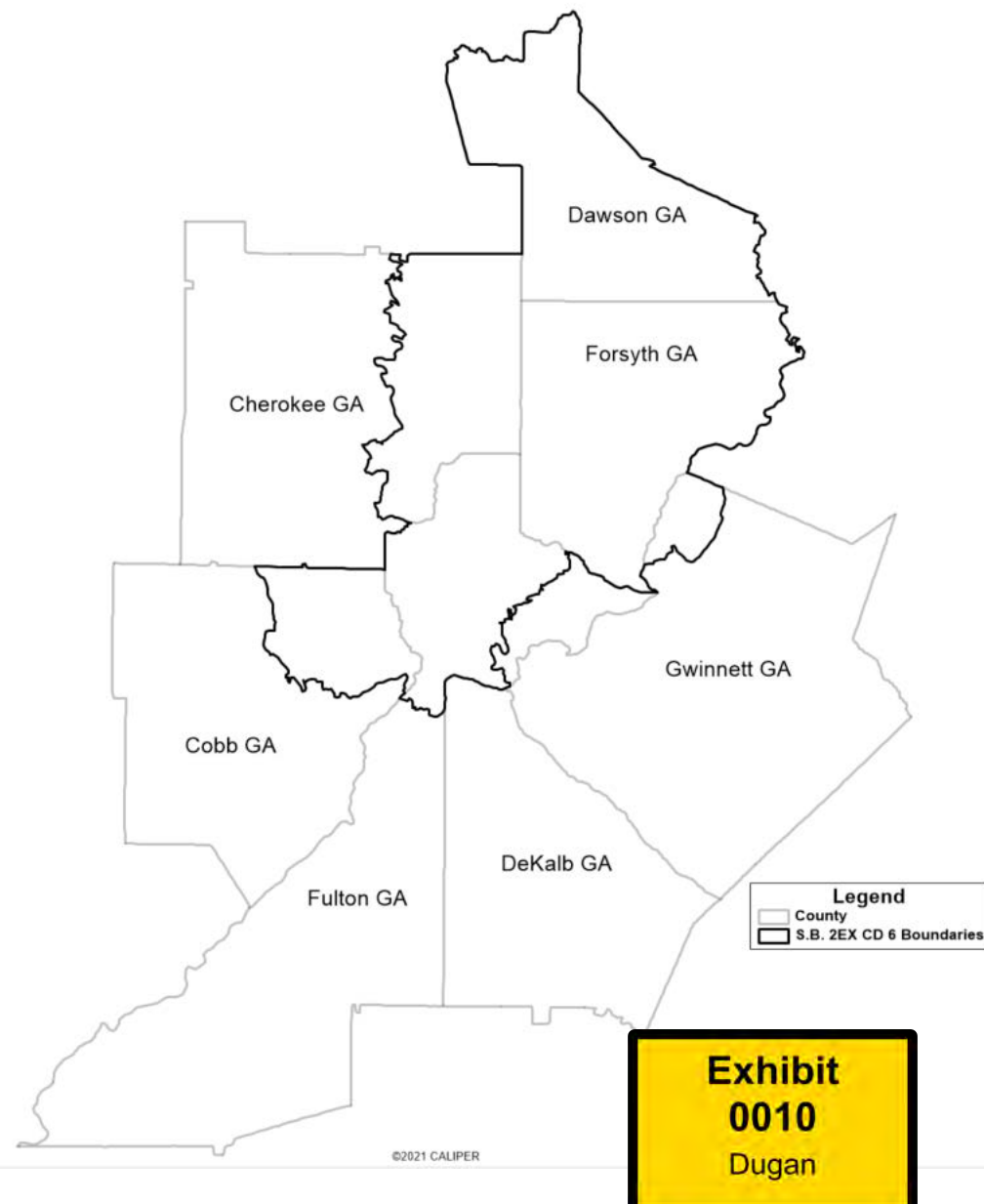
**Ideal District:** 765,136



## Prior Congressional District 6 Boundaries



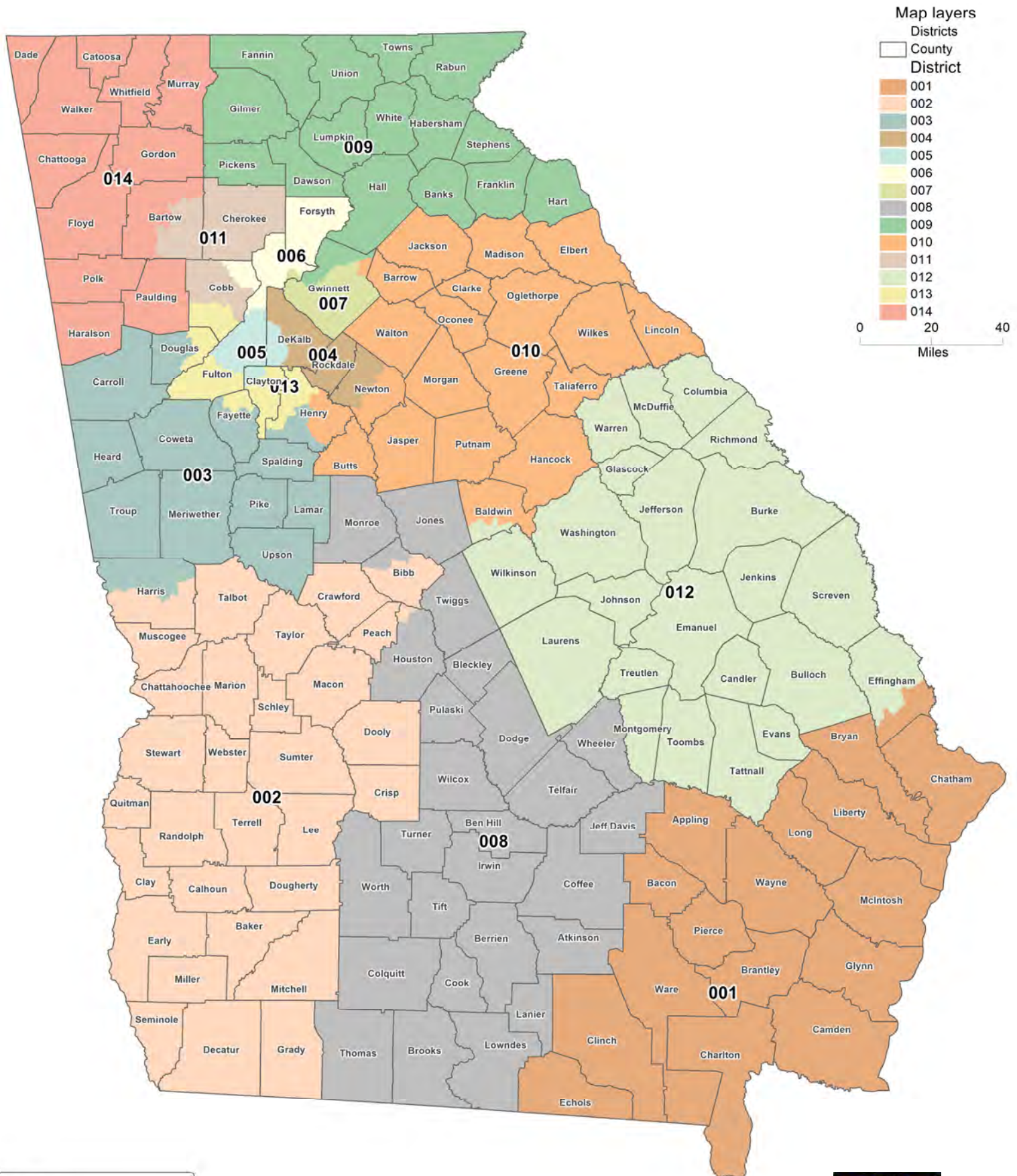
## S.B. 2EX Congressional District 6 Boundaries



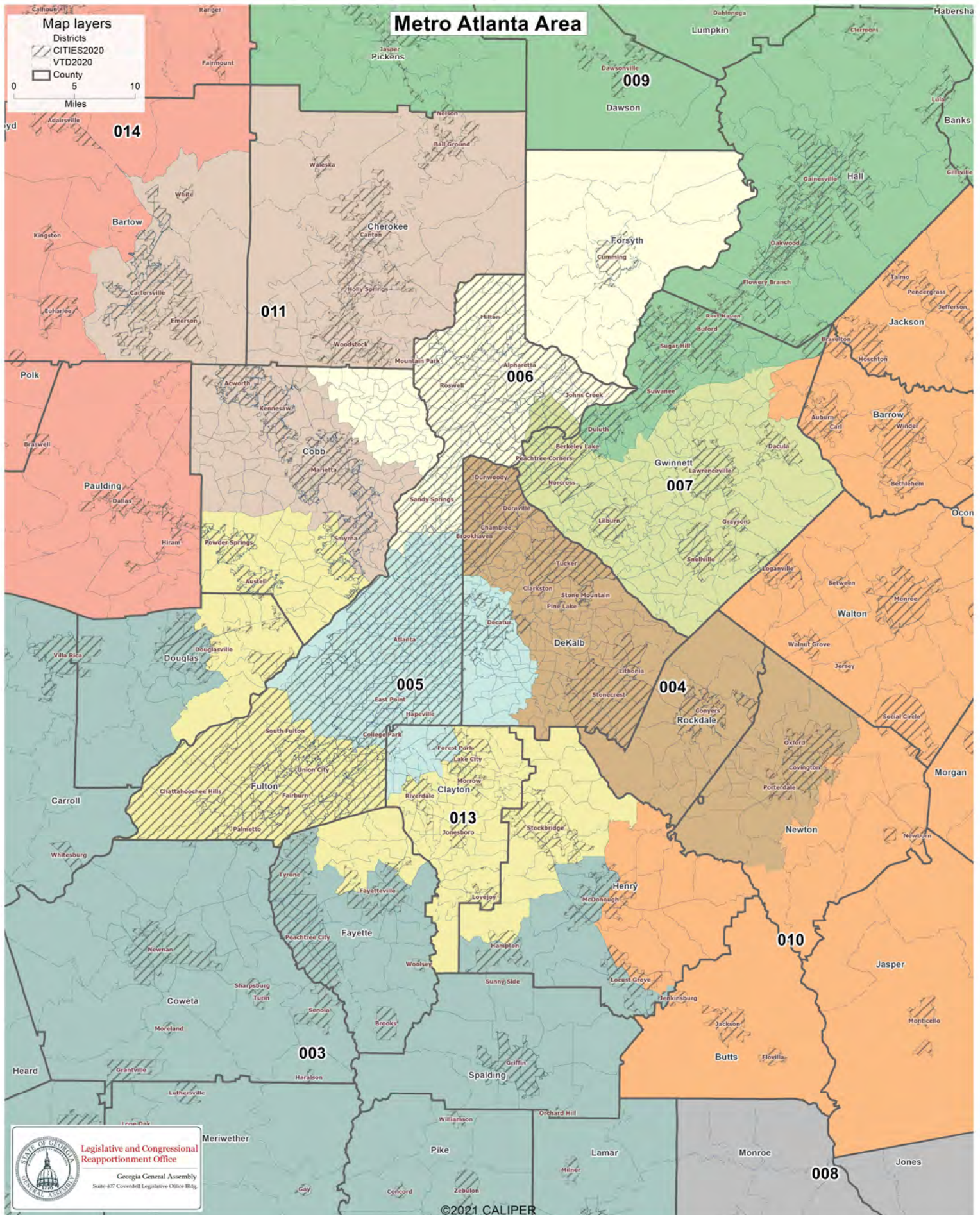


# Draft- Georgia Congressional Districts

Client: S018  
Plan: cong-s18-p1  
Type: Congress





**Draft- Georgia Congressional Districts**



User: S018

Plan Name: cong-s18-p1

Plan Type: Congress

## Population Summary

Tuesday, September 28, 2021

8:48 AM

### Summary Statistics:

Population Range: 765,135 to 765,138  
 Ratio Range: 0.00  
 Absolute Range: -1 to 2  
 Absolute Overall Range: 3  
 Relative Range: 0.00% to 0.00%  
 Relative Overall Range: 0.00%  
 Absolute Mean Deviation: 0.86  
 Relative Mean Deviation: 0.00%  
 Standard Deviation: 1.03

District	Population	Deviation	% Devn.	[18+ _Pop]	[% 18+ _Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	765,138	2	0.00%	589,477	77.04%	57.36%	27.69%	7.86%	2.19%	0.24%	0.16%	0.44%	4.07%
002	765,135	-1	0.00%	589,333	77.02%	41.68%	47.12%	5.9%	1.5%	0.2%	0.11%	0.35%	3.15%
003	765,135	-1	0.00%	583,333	76.24%	58.57%	27.89%	6.79%	2.1%	0.21%	0.04%	0.52%	3.89%
004	765,135	-1	0.00%	587,972	76.85%	25.85%	52.51%	11.52%	5.88%	0.16%	0.04%	0.64%	3.4%
005	765,137	1	0.00%	621,562	81.24%	32.66%	52.8%	6.5%	3.85%	0.16%	0.04%	0.53%	3.47%
006	765,136	0	0.00%	575,220	75.18%	60.96%	8.97%	10.26%	14.83%	0.14%	0.03%	0.69%	4.12%
007	765,135	-1	0.00%	567,113	74.12%	29.31%	29.42%	25.07%	11.87%	0.16%	0.04%	0.69%	3.43%
008	765,136	0	0.00%	583,009	76.2%	57.3%	30.05%	7.4%	1.52%	0.2%	0.04%	0.31%	3.18%
009	765,136	0	0.00%	595,476	77.83%	68.18%	7.45%	14.11%	6.06%	0.21%	0.03%	0.38%	3.58%
010	765,137	1	0.00%	591,955	77.37%	65.41%	20.66%	7.37%	2.33%	0.18%	0.03%	0.51%	3.51%
011	765,136	0	0.00%	594,934	77.76%	60.24%	16.93%	13.26%	3.96%	0.18%	0.04%	0.87%	4.53%
012	765,138	2	0.00%	586,770	76.69%	52.49%	35.68%	5.65%	1.83%	0.22%	0.11%	0.37%	3.65%
013	765,137	1	0.00%	574,626	75.1%	17.83%	61.68%	13.2%	3.24%	0.18%	0.04%	0.67%	3.15%
014	765,137	1	0.00%	579,494	75.74%	72.97%	9.58%	11.94%	1.02%	0.22%	0.04%	0.37%	3.85%

**Total: 10,711,908****Ideal District: 765,136**



User: S018

Plan Name: cong-s18-p1

Plan Type: Congress

**Population Summary**

Tuesday, September 28, 2021

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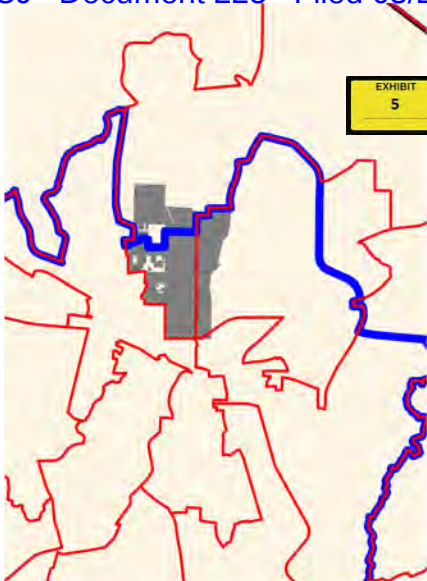
**Summary Statistics:**

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 Absolute Overall Range: 3  
 Relative Range: 0.00% to 0.00%  
 Relative Overall Range: 0.00%  
 Absolute Mean Deviation: 0.86  
 Relative Mean Deviation: 0.00%  
 Standard Deviation: 1.03

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	765,138	2	0.00%	589,477	77.04%	60.22%	26.57%	6.86%	2.36%	0.26%	0.15%	0.37%	3.22%
002	765,135	-1	0.00%	589,333	77.02%	44.42%	45.77%	5.08%	1.56%	0.22%	0.1%	0.29%	2.57%
003	765,135	-1	0.00%	583,333	76.24%	61.37%	26.97%	5.78%	2.11%	0.22%	0.04%	0.42%	3.1%
004	765,135	-1	0.00%	587,972	76.85%	28.24%	52.19%	10.02%	5.82%	0.16%	0.04%	0.58%	2.96%
005	765,137	1	0.00%	621,562	81.24%	34.84%	51.18%	5.97%	4.27%	0.16%	0.04%	0.48%	3.05%
006	765,136	0	0.00%	575,220	75.18%	63.79%	9.11%	9.15%	13.82%	0.13%	0.04%	0.62%	3.35%
007	765,135	-1	0.00%	567,113	74.12%	32.6%	28.65%	22.49%	12.65%	0.16%	0.04%	0.59%	2.82%
008	765,136	0	0.00%	583,009	76.2%	59.93%	29.17%	6.3%	1.58%	0.21%	0.04%	0.24%	2.53%
009	765,136	0	0.00%	595,476	77.83%	71.64%	7.16%	11.67%	6%	0.22%	0.03%	0.31%	2.96%
010	765,137	1	0.00%	591,955	77.37%	67.84%	20.06%	6.22%	2.35%	0.19%	0.03%	0.44%	2.87%
011	765,136	0	0.00%	594,934	77.76%	62.95%	16.79%	11.46%	4.04%	0.18%	0.04%	0.79%	3.74%
012	765,138	2	0.00%	586,770	76.69%	55.01%	34.63%	4.89%	1.95%	0.22%	0.1%	0.3%	2.89%
013	765,137	1	0.00%	574,626	75.1%	20.54%	61.07%	11.35%	3.46%	0.19%	0.04%	0.61%	2.73%
014	765,137	1	0.00%	579,494	75.74%	75.96%	9.3%	9.92%	1.05%	0.24%	0.04%	0.29%	3.21%

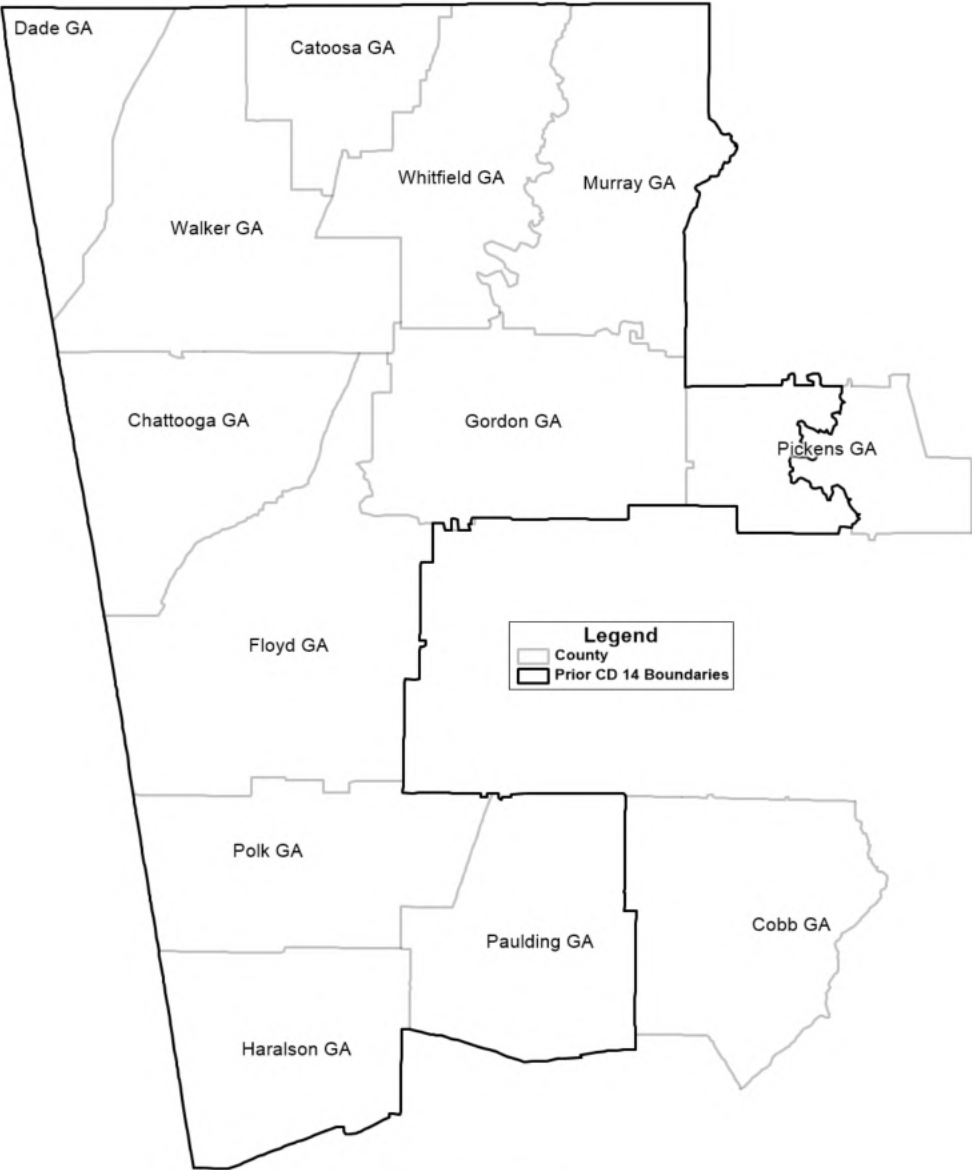
**Total: 10,711,908****Ideal District: 765,136**





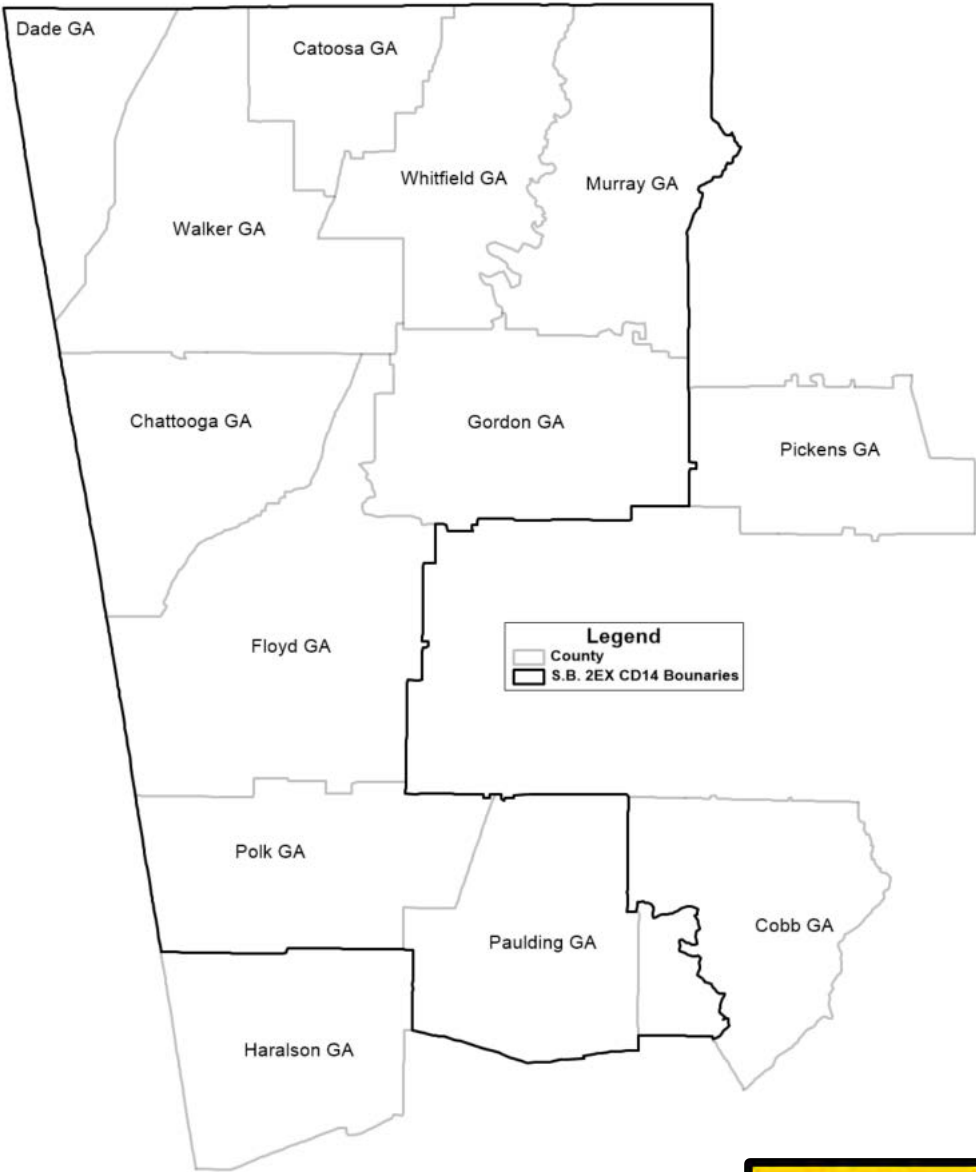


Prior Congressional District 14 Boundaries



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S.B. 2EX Congressional District 14 Boundaries



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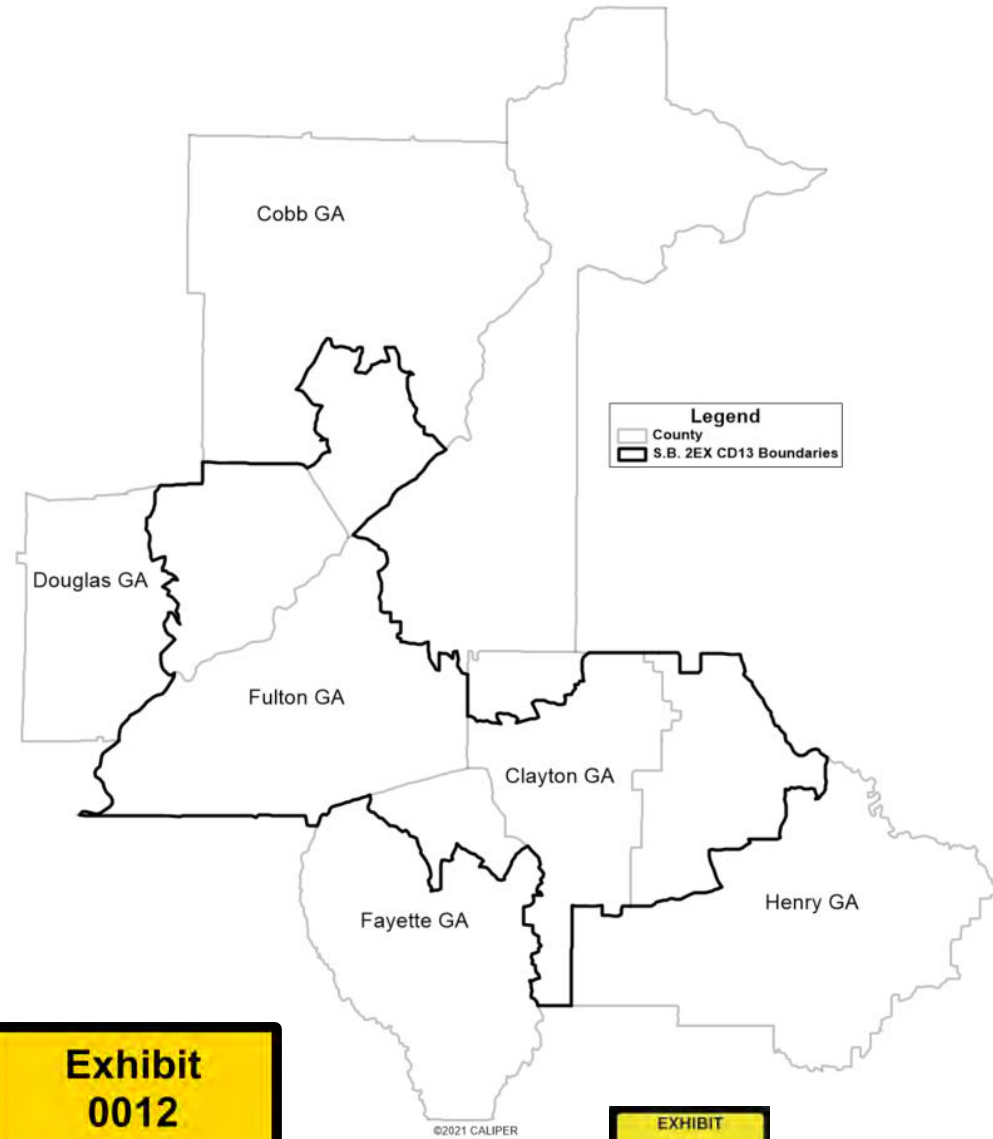




## Prior Congressional District 13 Boundaries



## S.B. 2EX Congressional District 13 Boundaries



**Exhibit**  
**0012**  
Dugan

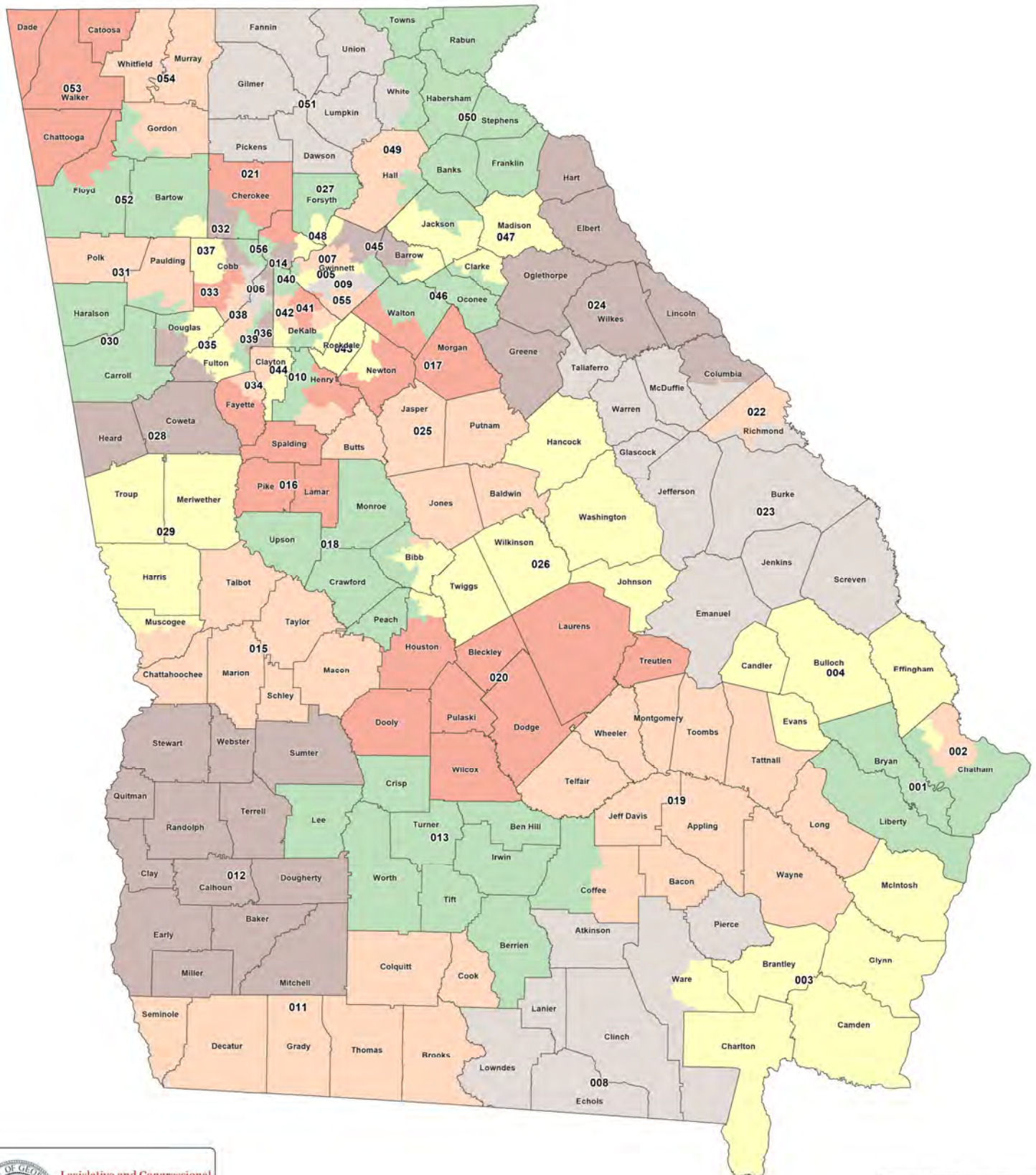
**EXHIBIT**  
**7**







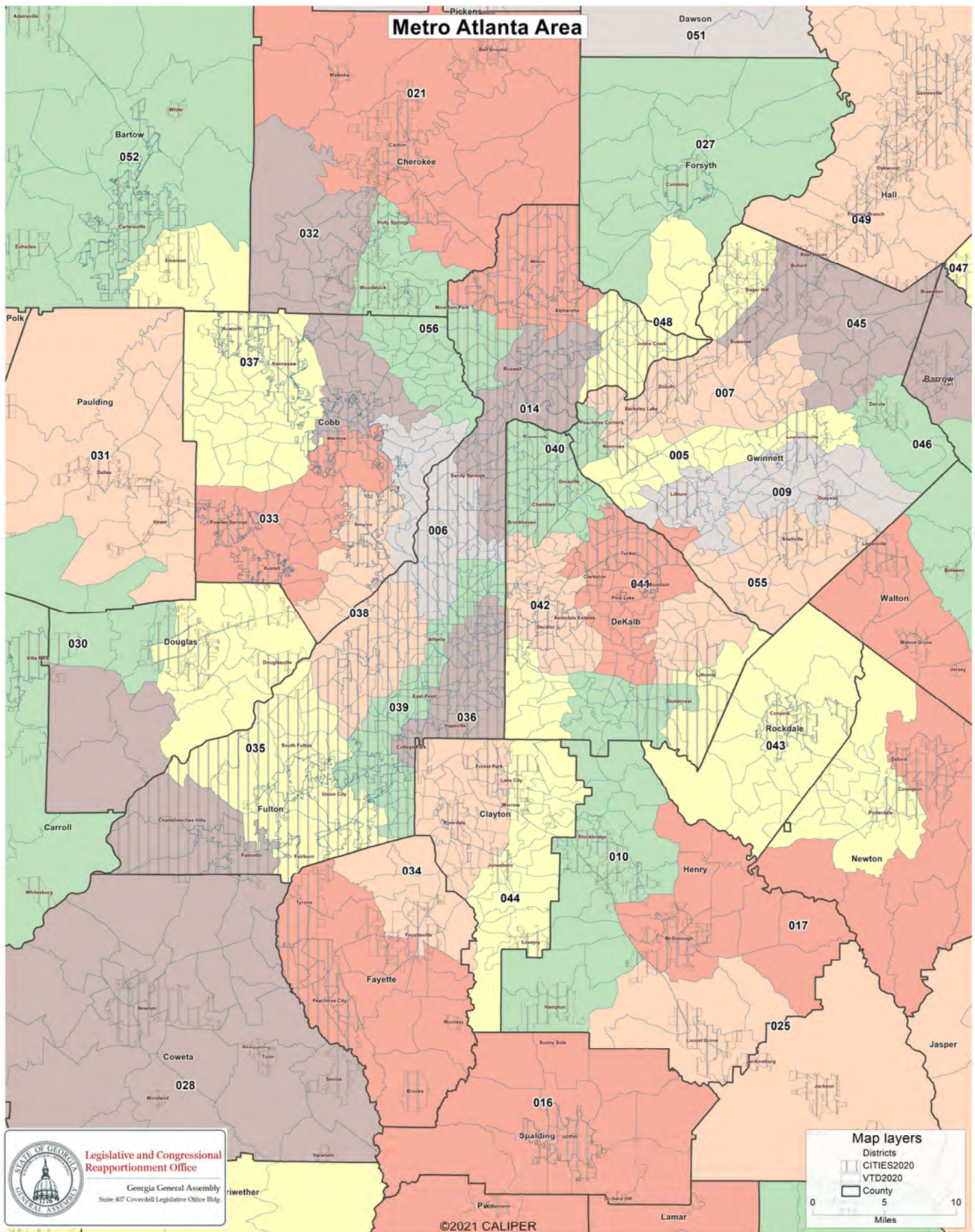
# Georgia Senate Districts- 2022





# Georgia Senate Districts- 2022

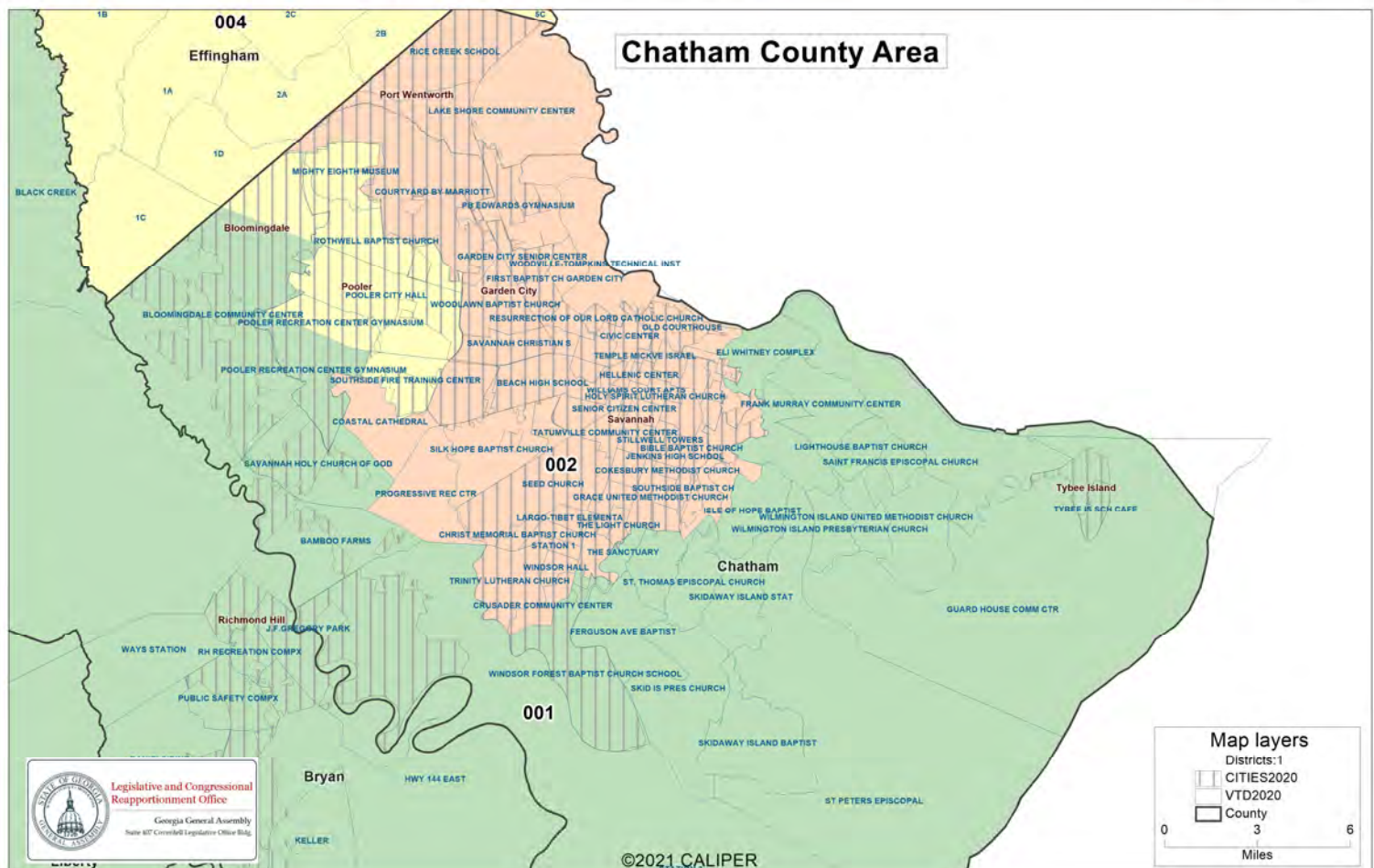
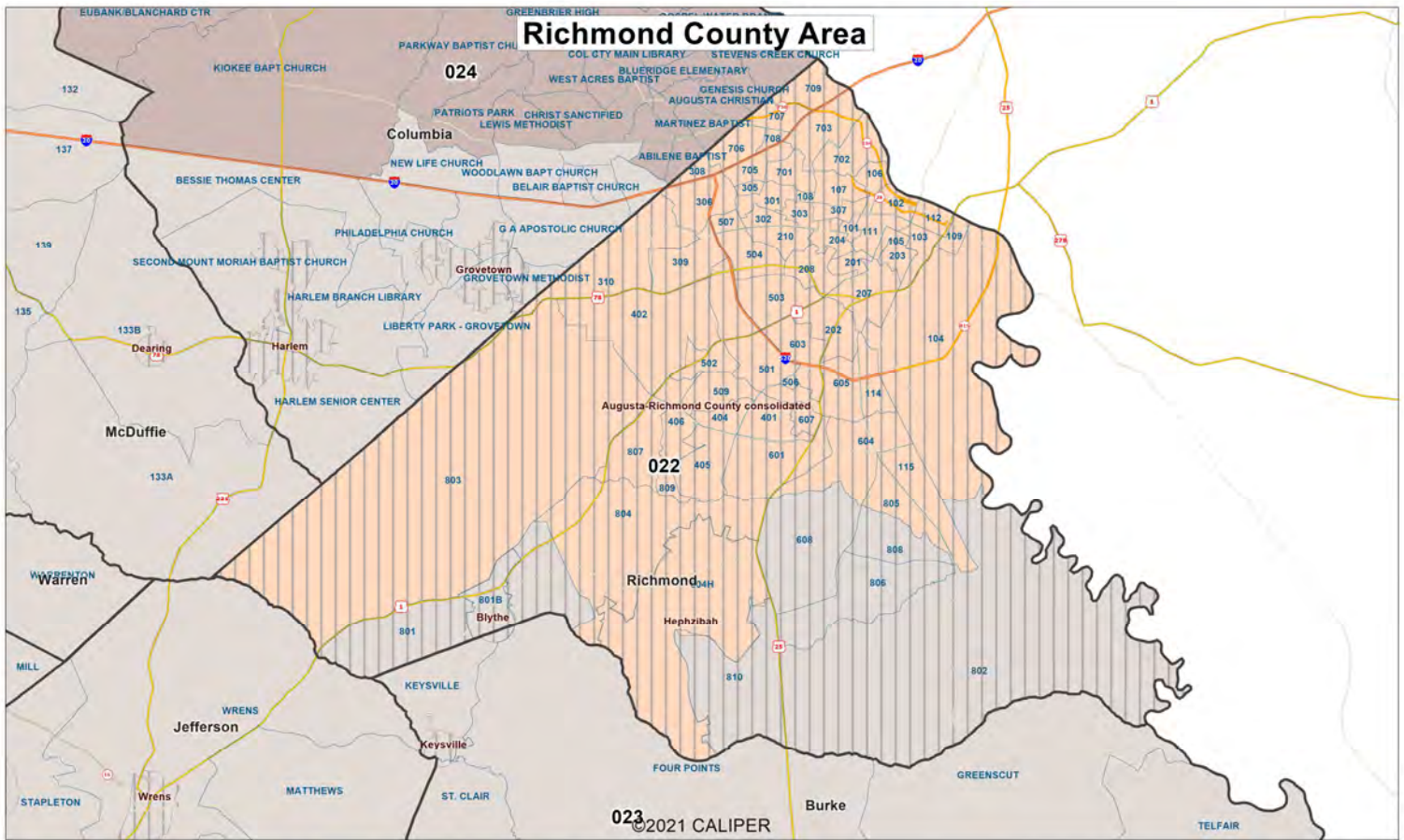
Client: State  
Plan: Senate-prop1-2021  
Type: Senate





# Georgia Senate Districts- 2022

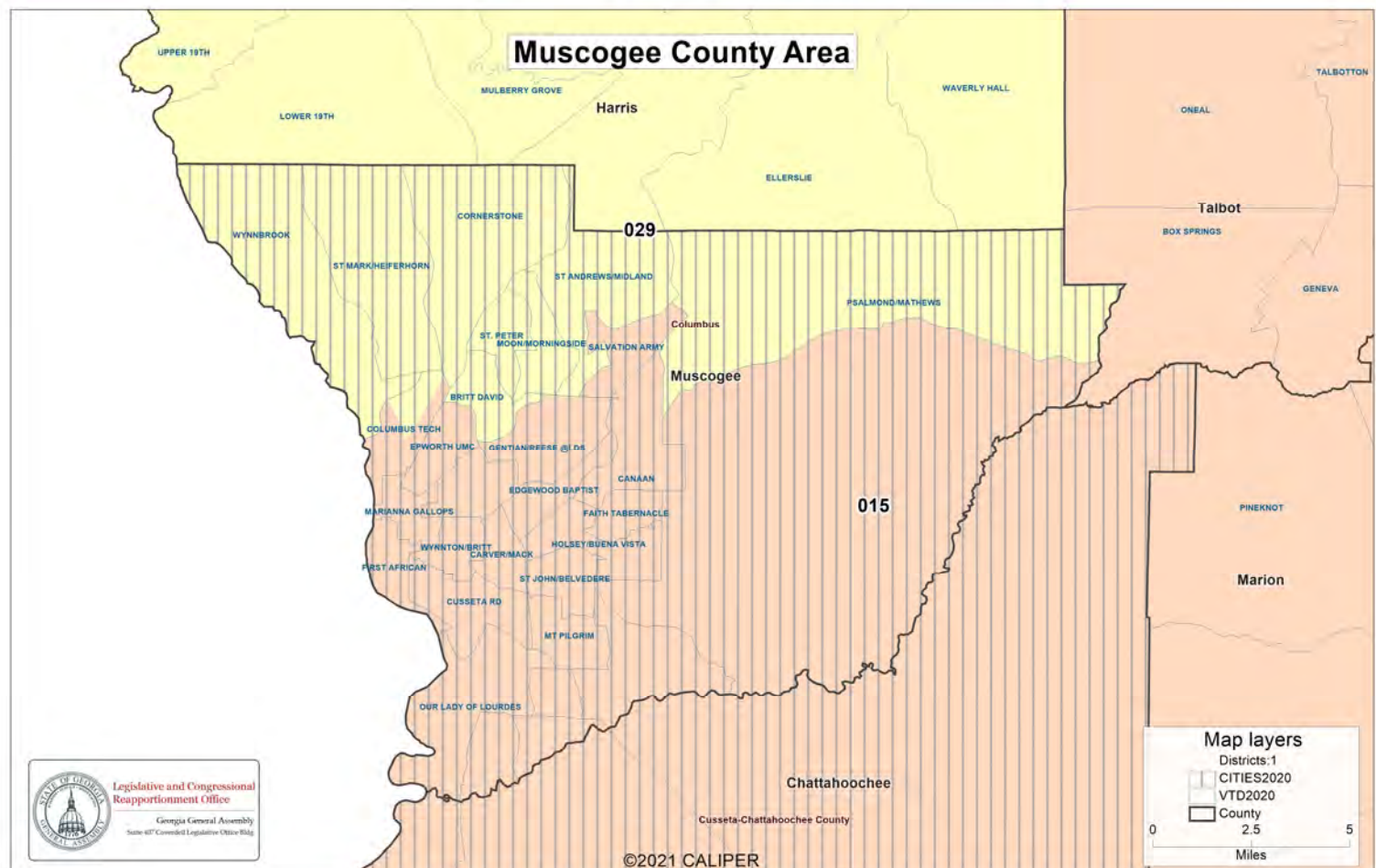
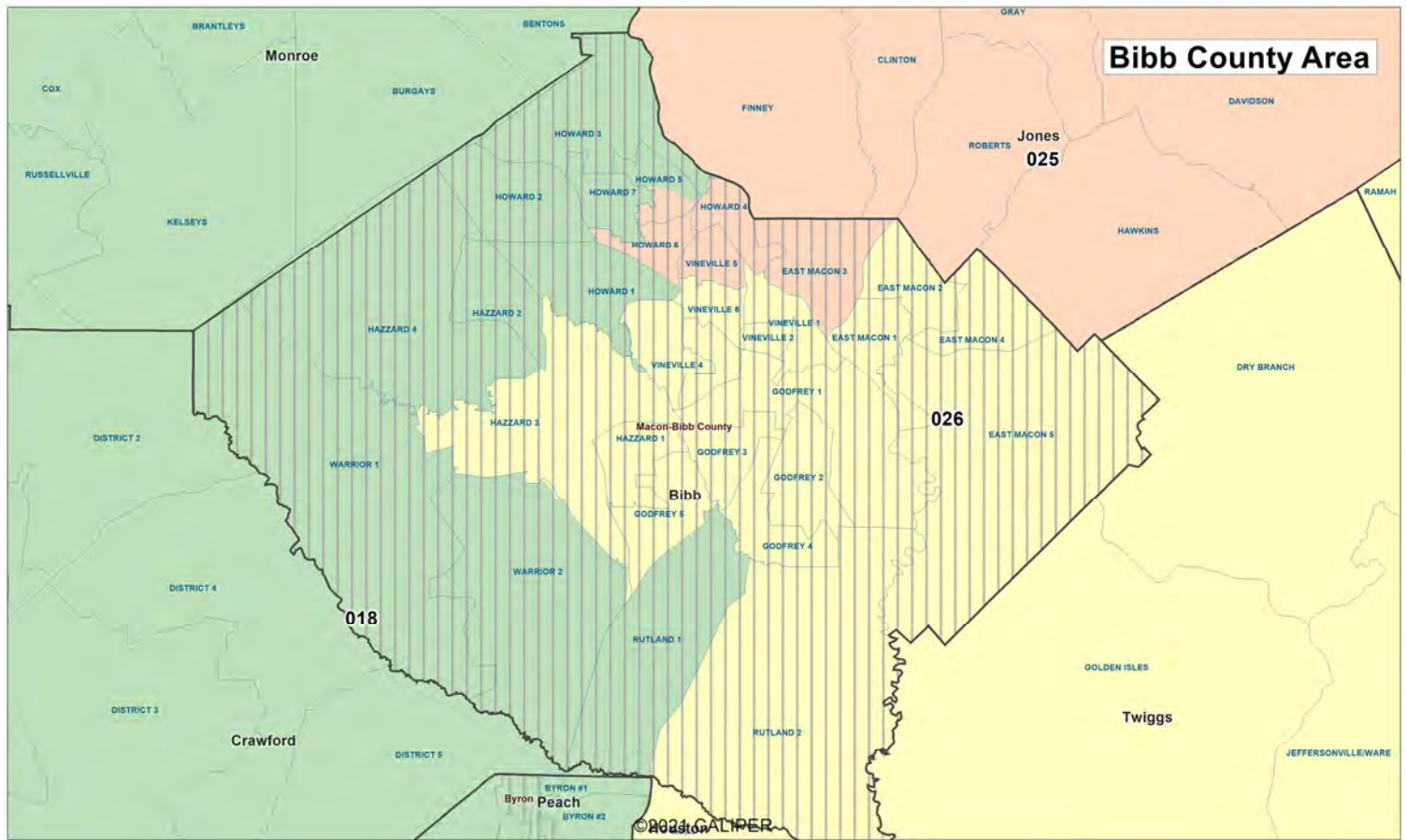
Client: State  
Plan: Senate-prop1-2021  
Type: Senate





# Georgia Senate Districts- 2022

Client: State  
Plan: Senate-prop1-2021  
Type: Senate



Legislative and Congressional  
Reapportionment Office

Georgia General Assembly  
Sate 637 Corvett Legislative Office Bldg

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User: State

Plan Name: Senate-prop1-2021

Plan Type: Senate

## Population Summary

### Summary Statistics:

Population Range:	189,320 to 193,163
Ratio Range:	0.02
Absolute Range:	-1,964 to 1,879
Absolute Overall Range:	3,843
Relative Range:	-1.03% to 0.98%
Relative Overall Range:	2.01%
Absolute Mean Deviation:	1,012.61
Relative Mean Deviation:	0.53%
Standard Deviation:	1,154.96

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	191,402	118	0.06%	145,428	75.98%	58.9%	23.66%	8.78%	2.64%	0.25%	0.3%	0.48%	4.99%
002	190,408	-876	-0.46%	150,843	79.22%	36.4%	47.51%	8.36%	3.4%	0.21%	0.15%	0.46%	3.49%
003	191,212	-72	-0.04%	148,915	77.88%	66.23%	20.92%	6.82%	1.22%	0.26%	0.09%	0.42%	4.04%
004	191,098	-186	-0.10%	146,443	76.63%	64.48%	22.6%	6.49%	1.86%	0.23%	0.07%	0.38%	3.9%
005	191,921	637	0.33%	139,394	72.63%	13.35%	26.84%	45.47%	10.98%	0.15%	0.04%	0.64%	2.52%
006	191,401	117	0.06%	155,781	81.39%	56.41%	21.47%	9.18%	7.21%	0.16%	0.03%	1.11%	4.42%
007	189,709	-1,575	-0.82%	147,425	77.71%	35.09%	20.08%	18.57%	21.67%	0.16%	0.04%	0.66%	3.72%
008	192,396	1,112	0.58%	145,144	75.44%	57.39%	30.03%	7.28%	1.21%	0.28%	0.07%	0.35%	3.4%
009	192,915	1,631	0.85%	142,054	73.64%	32.04%	28.46%	21.09%	13.98%	0.18%	0.03%	0.72%	3.48%
010	192,898	1,614	0.84%	147,884	76.66%	17.71%	68.95%	6.03%	3.1%	0.18%	0.03%	0.66%	3.34%
011	189,976	-1,308	-0.68%	144,597	76.11%	55.75%	31.13%	9.36%	0.69%	0.23%	0.03%	0.26%	2.54%
012	190,819	-465	-0.24%	149,154	78.17%	33.83%	58.82%	3.89%	0.86%	0.16%	0.02%	0.21%	2.2%
013	189,326	-1,958	-1.02%	144,141	76.13%	61.25%	27.08%	7.2%	1.2%	0.17%	0.02%	0.26%	2.81%
014	192,533	1,249	0.65%	155,340	80.68%	54.63%	16.79%	13.97%	9.46%	0.13%	0.04%	0.79%	4.19%
015	189,446	-1,838	-0.96%	144,506	76.28%	34.07%	52.31%	7.57%	1.31%	0.23%	0.27%	0.44%	3.79%
016	191,829	545	0.28%	147,133	76.7%	64.19%	22.31%	5.95%	3.04%	0.17%	0.03%	0.51%	3.79%
017	192,510	1,226	0.64%	144,472	75.05%	56.69%	31.21%	6.08%	1.41%	0.16%	0.05%	0.59%	3.81%
018	191,825	541	0.28%	150,196	78.3%	58.41%	30.01%	5.18%	2.42%	0.22%	0.03%	0.4%	3.33%
019	192,316	1,032	0.54%	146,131	75.98%	61.67%	24.76%	9.72%	0.58%	0.17%	0.06%	0.27%	2.77%
020	192,588	1,304	0.68%	147,033	76.35%	59.74%	30.65%	4.21%	1.73%	0.15%	0.05%	0.31%	3.16%
021	192,572	1,288	0.67%	145,120	75.36%	71.13%	6.52%	10.13%	7.38%	0.19%	0.04%	0.53%	4.08%
022	193,163	1,879	0.98%	150,450	77.89%	31.1%	56.58%	5.63%	1.97%	0.24%	0.18%	0.44%	3.86%
023	190,344	-940	-0.49%	144,113	75.71%	54.27%	34.66%	5.46%	1.16%	0.24%	0.1%	0.34%	3.78%
024	192,674	1,390	0.73%	148,602	77.13%	67.45%	18.98%	5.4%	3.31%	0.18%	0.09%	0.43%	4.15%
025	191,161	-123	-0.06%	148,917	77.9%	57.45%	33.4%	4.27%	1.08%	0.16%	0.05%	0.43%	3.16%
026	189,945	-1,339	-0.70%	145,744	76.73%	33.26%	57.37%	4.85%	0.83%	0.21%	0.04%	0.31%	3.14%
027	190,676	-608	-0.32%	139,196	73%	68%	4.31%	11.61%	11.41%	0.18%	0.04%	0.52%	3.94%
028	190,422	-862	-0.45%	144,973	76.13%	67.06%	18.79%	7.4%	1.96%	0.22%	0.04%	0.48%	4.06%
029	189,424	-1,860	-0.97%	145,674	76.9%	60.71%	26.22%	5.34%	3.02%	0.23%	0.1%	0.42%	3.97%



## Population Summary

Senate-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
030	191,475	191	0.10%	145,077	75.77%	66.97%	19.83%	7.27%	0.95%	0.23%	0.03%	0.49%	4.24%
031	192,560	1,276	0.67%	142,251	73.87%	65.2%	19.83%	8.85%	1.07%	0.23%	0.06%	0.58%	4.19%
032	192,448	1,164	0.61%	149,879	77.88%	63.13%	13.22%	12.09%	5.49%	0.2%	0.04%	0.91%	4.91%
033	192,694	1,410	0.74%	146,415	75.98%	26%	40.48%	26.72%	2.13%	0.19%	0.05%	0.86%	3.56%
034	190,668	-616	-0.32%	141,840	74.39%	11.11%	66.6%	14.82%	3.9%	0.23%	0.04%	0.6%	2.7%
035	192,839	1,555	0.81%	144,675	75.02%	16.46%	69.77%	8.68%	1.13%	0.17%	0.06%	0.64%	3.08%
036	192,282	998	0.52%	161,385	83.93%	33.1%	51.35%	7.56%	3.58%	0.17%	0.04%	0.53%	3.68%
037	192,671	1,387	0.73%	147,779	76.7%	62.38%	18.04%	9.99%	3.85%	0.16%	0.03%	0.78%	4.76%
038	193,155	1,871	0.98%	148,367	76.81%	20.03%	62.74%	9.72%	3.42%	0.18%	0.04%	0.58%	3.29%
039	191,500	216	0.11%	156,022	81.47%	25.32%	60.33%	6.1%	4.25%	0.16%	0.04%	0.57%	3.22%
040	190,544	-740	-0.39%	147,000	77.15%	43.69%	16.42%	24.81%	10.84%	0.12%	0.04%	0.65%	3.43%
041	191,023	-261	-0.14%	145,278	76.05%	18.86%	60.28%	7.32%	9.19%	0.22%	0.02%	0.64%	3.48%
042	190,940	-344	-0.18%	153,952	80.63%	49.91%	28.14%	10.13%	6.81%	0.13%	0.03%	0.61%	4.24%
043	192,729	1,445	0.76%	145,741	75.62%	23.45%	62.77%	8.13%	1.24%	0.17%	0.09%	0.67%	3.49%
044	190,036	-1,248	-0.65%	145,224	76.42%	13.02%	69.13%	9.96%	4.15%	0.16%	0.04%	0.62%	2.91%
045	190,692	-592	-0.31%	140,706	73.79%	52.74%	17.12%	14.66%	10.69%	0.13%	0.03%	0.62%	4.01%
046	190,312	-972	-0.51%	146,713	77.09%	67.24%	16.64%	7.99%	3.77%	0.2%	0.03%	0.58%	3.56%
047	190,607	-677	-0.35%	146,599	76.91%	64.67%	16.96%	11.22%	2.66%	0.16%	0.04%	0.58%	3.71%
048	190,123	-1,161	-0.61%	136,995	72.06%	49.01%	8.35%	7.58%	30.59%	0.13%	0.04%	0.55%	3.75%
049	189,355	-1,929	-1.01%	144,123	76.11%	60.85%	7.13%	26.24%	2.15%	0.15%	0.04%	0.35%	3.08%
050	189,320	-1,964	-1.03%	148,799	78.6%	78.61%	5.05%	11.08%	1.22%	0.22%	0.04%	0.26%	3.52%
051	190,167	-1,117	-0.58%	155,571	81.81%	88.75%	0.84%	5.43%	0.59%	0.31%	0.02%	0.3%	3.77%
052	190,799	-485	-0.25%	146,620	76.85%	71.8%	12.39%	10.11%	1.08%	0.21%	0.03%	0.35%	4.02%
053	190,236	-1,048	-0.55%	148,201	77.9%	85.78%	4.46%	3.98%	1%	0.24%	0.06%	0.3%	4.18%
054	192,443	1,159	0.61%	143,843	74.75%	65.71%	2.97%	26.66%	1.14%	0.19%	0.02%	0.25%	3.07%
055	190,155	-1,129	-0.59%	141,968	74.66%	18.09%	62.96%	10.14%	4.19%	0.17%	0.04%	0.73%	3.67%
056	191,226	-58	-0.03%	144,448	75.54%	73.9%	6.36%	8.63%	5.67%	0.11%	0.03%	0.75%	4.56%

**Total: 10,711,908****Ideal District: 191,284**



User: State

Plan Name: Senate-prop1-2021

Plan Type: Senate

## Population Summary

### Summary Statistics:

Population Range:	189,320 to 193,163
Ratio Range:	0.02
Absolute Range:	-1,964 to 1,879
Absolute Overall Range:	3,843
Relative Range:	-1.03% to 0.98%
Relative Overall Range:	2.01%
Absolute Mean Deviation:	1,012.61
Relative Mean Deviation:	0.53%
Standard Deviation:	1,154.96

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	191,402	118	0.06%	145,428	75.98%	61.99%	22.8%	7.55%	2.81%	0.28%	0.27%	0.4%	3.9%
002	190,408	-876	-0.46%	150,843	79.22%	40.21%	44.81%	7.48%	3.77%	0.22%	0.15%	0.42%	2.95%
003	191,212	-72	-0.04%	148,915	77.88%	68.88%	19.81%	6.17%	1.27%	0.27%	0.08%	0.34%	3.19%
004	191,098	-186	-0.10%	146,443	76.63%	66.78%	21.98%	5.52%	1.9%	0.24%	0.07%	0.33%	3.17%
005	191,921	637	0.33%	139,394	72.63%	15.69%	27.21%	41.67%	12.41%	0.14%	0.04%	0.55%	2.28%
006	191,401	117	0.06%	155,781	81.39%	57.79%	21.79%	8.24%	7.14%	0.16%	0.03%	1.05%	3.8%
007	189,709	-1,575	-0.82%	147,425	77.71%	37.84%	19.33%	16.56%	22.58%	0.16%	0.05%	0.55%	2.93%
008	192,396	1,112	0.58%	145,144	75.44%	60.1%	29.02%	6.21%	1.27%	0.29%	0.08%	0.27%	2.75%
009	192,915	1,631	0.85%	142,054	73.64%	35.81%	27.23%	18.77%	14.59%	0.18%	0.04%	0.59%	2.8%
010	192,898	1,614	0.84%	147,884	76.66%	19.64%	68.31%	5.18%	3.15%	0.18%	0.04%	0.61%	2.89%
011	189,976	-1,308	-0.68%	144,597	76.11%	58.97%	30.08%	7.6%	0.72%	0.26%	0.02%	0.22%	2.13%
012	190,819	-465	-0.24%	149,154	78.17%	36.71%	56.63%	3.48%	0.92%	0.18%	0.02%	0.18%	1.88%
013	189,326	-1,958	-1.02%	144,141	76.13%	64.1%	26.01%	6.01%	1.21%	0.17%	0.02%	0.21%	2.26%
014	192,533	1,249	0.65%	155,340	80.68%	57.1%	16.83%	12.13%	9.43%	0.12%	0.05%	0.74%	3.61%
015	189,446	-1,838	-0.96%	144,506	76.28%	36.52%	51.56%	6.59%	1.45%	0.23%	0.25%	0.36%	3.04%
016	191,829	545	0.28%	147,133	76.7%	66.91%	21.49%	5.03%	2.92%	0.18%	0.03%	0.42%	3.01%
017	192,510	1,226	0.64%	144,472	75.05%	59.42%	30.21%	5.13%	1.41%	0.17%	0.03%	0.49%	3.14%
018	191,825	541	0.28%	150,196	78.3%	60.69%	29.2%	4.51%	2.46%	0.22%	0.03%	0.29%	2.6%
019	192,316	1,032	0.54%	146,131	75.98%	63.99%	24.52%	8.38%	0.62%	0.18%	0.06%	0.2%	2.06%
020	192,588	1,304	0.68%	147,033	76.35%	61.71%	30.17%	3.49%	1.76%	0.16%	0.05%	0.25%	2.41%
021	192,572	1,288	0.67%	145,120	75.36%	73.87%	6.37%	8.77%	6.98%	0.18%	0.04%	0.48%	3.32%
022	193,163	1,879	0.98%	150,450	77.89%	34.38%	53.94%	5.35%	2.3%	0.24%	0.18%	0.38%	3.24%
023	190,344	-940	-0.49%	144,113	75.71%	56.89%	33.91%	4.52%	1.24%	0.25%	0.09%	0.27%	2.84%
024	192,674	1,390	0.73%	148,602	77.13%	69.81%	18.69%	4.4%	3.27%	0.2%	0.07%	0.35%	3.2%
025	191,161	-123	-0.06%	148,917	77.9%	59.94%	32.23%	3.66%	1.09%	0.18%	0.04%	0.39%	2.48%
026	189,945	-1,339	-0.70%	145,744	76.73%	36.6%	55.18%	4.24%	0.92%	0.22%	0.03%	0.24%	2.56%
027	190,676	-608	-0.32%	139,196	73%	71.5%	4.16%	10.2%	10.27%	0.15%	0.04%	0.45%	3.22%
028	190,422	-862	-0.45%	144,973	76.13%	69.44%	18.18%	6.44%	1.99%	0.23%	0.04%	0.38%	3.29%



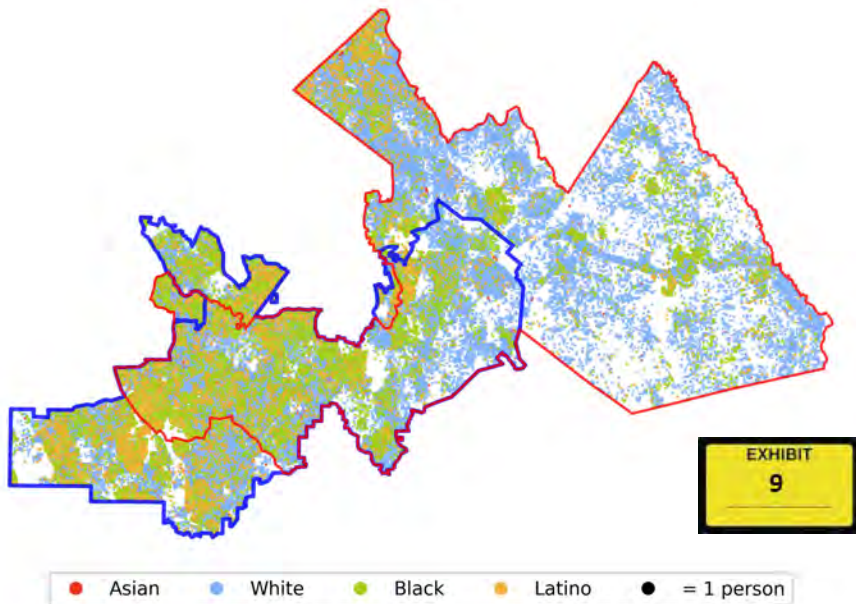
## Population Summary

Senate-prop1-2021

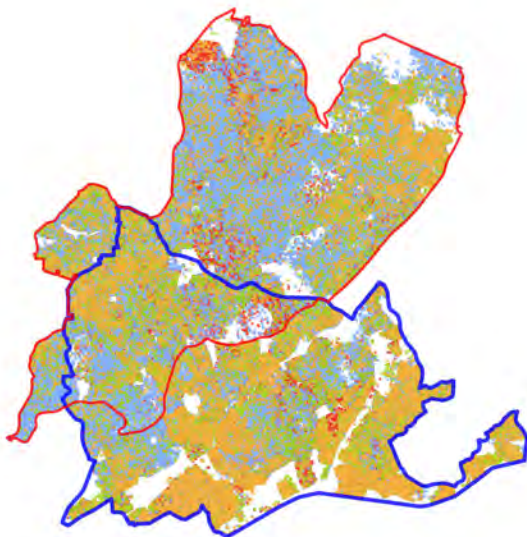
District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn ]	[% NH18+_Oth]	[% NH18+_ 2+ Races]
029	189,424	-1,860	-0.97%	145,674	76.9%	63.22%	25.52%	4.45%	3%	0.23%	0.11%	0.33%	3.13%
030	191,475	191	0.10%	145,077	75.77%	69.41%	19.44%	6.1%	0.97%	0.24%	0.03%	0.41%	3.4%
031	192,560	1,276	0.67%	142,251	73.87%	68.26%	19.13%	7.42%	1.12%	0.22%	0.06%	0.46%	3.33%
032	192,448	1,164	0.61%	149,879	77.88%	65.78%	13.13%	10.55%	5.42%	0.2%	0.04%	0.83%	4.05%
033	192,694	1,410	0.74%	146,415	75.98%	30.25%	40.26%	22.93%	2.35%	0.22%	0.05%	0.81%	3.14%
034	190,668	-616	-0.32%	141,840	74.39%	13.36%	66.5%	12.75%	4.26%	0.22%	0.04%	0.56%	2.31%
035	192,839	1,555	0.81%	144,675	75.02%	18.82%	68.87%	7.51%	1.26%	0.18%	0.06%	0.59%	2.7%
036	192,282	998	0.52%	161,385	83.93%	36.18%	48.68%	7.06%	4.01%	0.17%	0.04%	0.51%	3.34%
037	192,671	1,387	0.73%	147,779	76.7%	65.37%	17.41%	8.69%	3.94%	0.17%	0.04%	0.67%	3.73%
038	193,155	1,871	0.98%	148,367	76.81%	21.87%	62.45%	8.44%	3.55%	0.18%	0.04%	0.56%	2.92%
039	191,500	216	0.11%	156,022	81.47%	27.87%	57.97%	5.65%	4.83%	0.15%	0.04%	0.5%	2.98%
040	190,544	-740	-0.39%	147,000	77.15%	46.34%	17.32%	21.62%	11.15%	0.11%	0.04%	0.59%	2.84%
041	191,023	-261	-0.14%	145,278	76.05%	21.39%	59.67%	6.68%	8.42%	0.22%	0.02%	0.6%	3.01%
042	190,940	-344	-0.18%	153,952	80.63%	51.39%	28.73%	8.64%	7.16%	0.12%	0.03%	0.53%	3.4%
043	192,729	1,445	0.76%	145,741	75.62%	26.53%	61.35%	6.89%	1.34%	0.17%	0.08%	0.6%	3.05%
044	190,036	-1,248	-0.65%	145,224	76.42%	15.29%	68.39%	8.6%	4.37%	0.17%	0.04%	0.56%	2.58%
045	190,692	-592	-0.31%	140,706	73.79%	55.47%	16.86%	13.05%	10.89%	0.13%	0.03%	0.5%	3.07%
046	190,312	-972	-0.51%	146,713	77.09%	69.9%	15.64%	6.99%	3.85%	0.22%	0.02%	0.5%	2.89%
047	190,607	-677	-0.35%	146,599	76.91%	67.46%	16.34%	9.57%	2.79%	0.17%	0.04%	0.5%	3.13%
048	190,123	-1,161	-0.61%	136,995	72.06%	52.25%	8.26%	7%	29.05%	0.11%	0.04%	0.47%	2.83%
049	189,355	-1,929	-1.01%	144,123	76.11%	65.64%	7.12%	21.9%	2.22%	0.16%	0.04%	0.29%	2.63%
050	189,320	-1,964	-1.03%	148,799	78.6%	81.54%	5.03%	8.78%	1.24%	0.24%	0.03%	0.24%	2.91%
051	190,167	-1,117	-0.58%	155,571	81.81%	90.24%	0.84%	4.34%	0.61%	0.33%	0.02%	0.27%	3.34%
052	190,799	-485	-0.25%	146,620	76.85%	74.74%	12.08%	8.24%	1.13%	0.22%	0.02%	0.29%	3.27%
053	190,236	-1,048	-0.55%	148,201	77.9%	87.31%	4.49%	3.23%	0.99%	0.26%	0.06%	0.22%	3.44%
054	192,443	1,159	0.61%	143,843	74.75%	69.98%	3.07%	22.64%	1.15%	0.22%	0.02%	0.21%	2.71%
055	190,155	-1,129	-0.59%	141,968	74.66%	20.56%	62.42%	8.71%	4.24%	0.18%	0.04%	0.67%	3.18%
056	191,226	-58	-0.03%	144,448	75.54%	76.17%	6.37%	7.66%	5.51%	0.12%	0.03%	0.63%	3.51%

**Total: 10,711,908****Ideal District: 191,284**









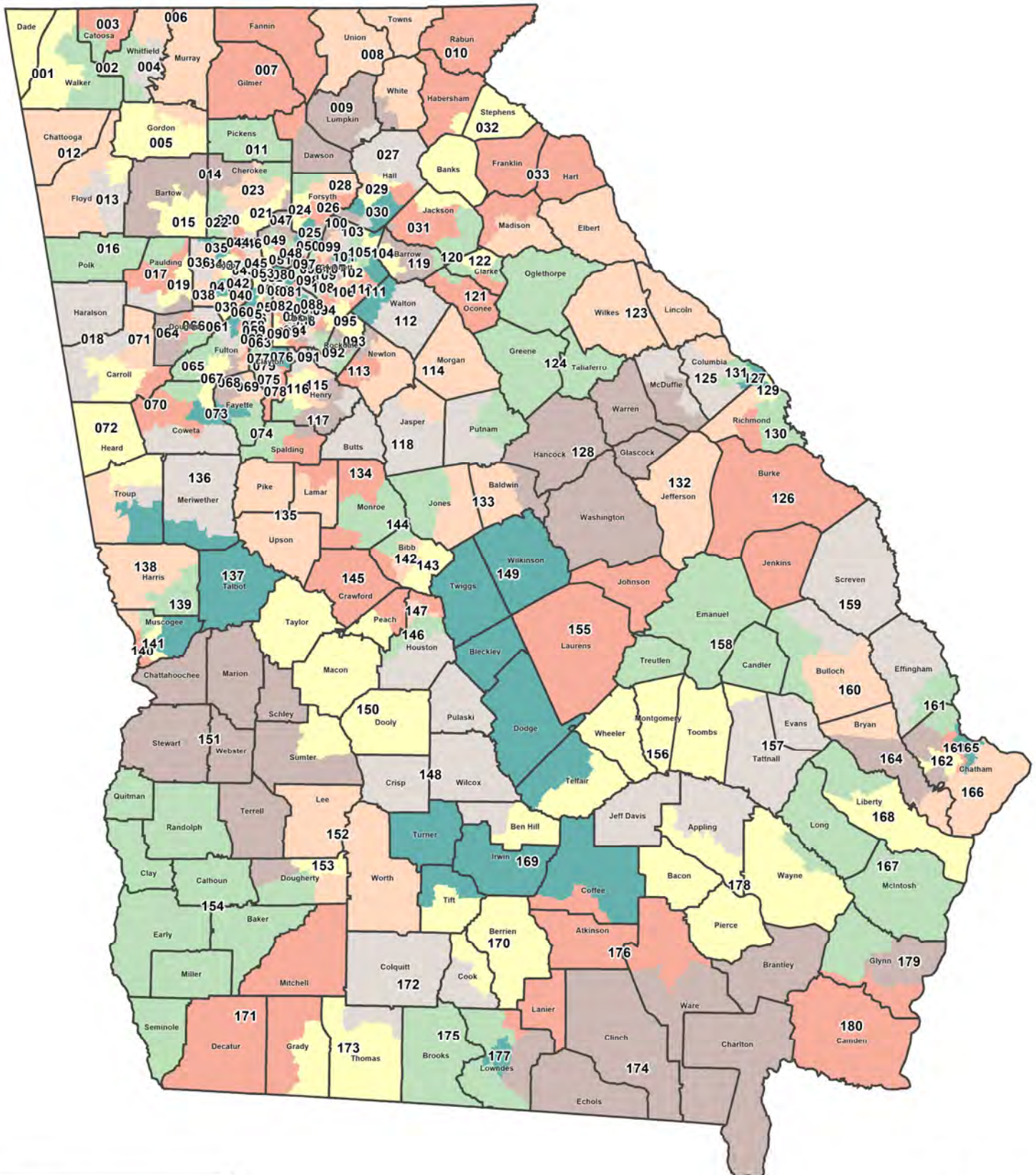
EXHIBIT

10

● Asian    ● White    ● Black    ● Latino    ● = 1 person



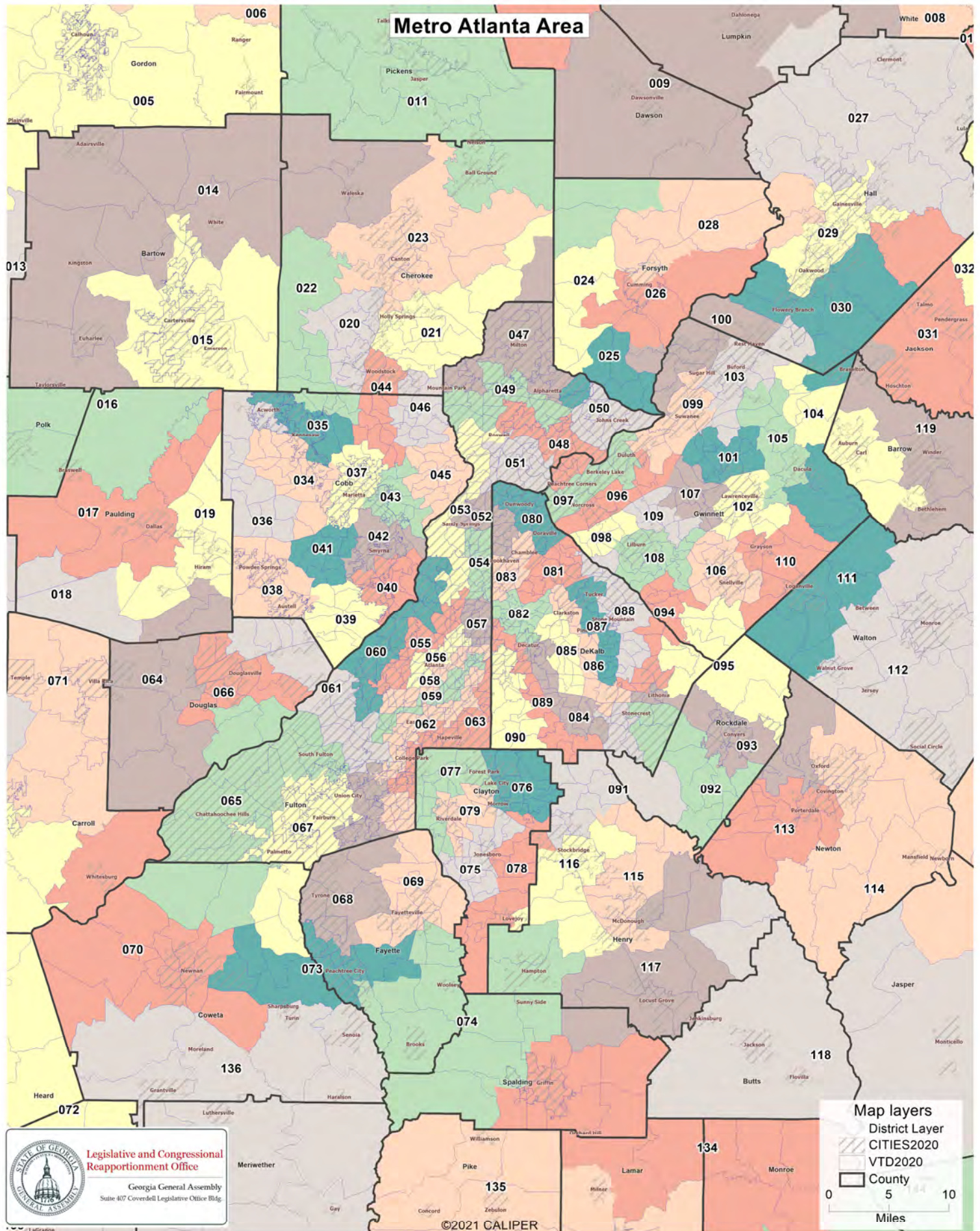
# Georgia House Districts- 2022





# Georgia House Districts- 2022

Client: State  
Plan: House-prop1-2021  
Type: House



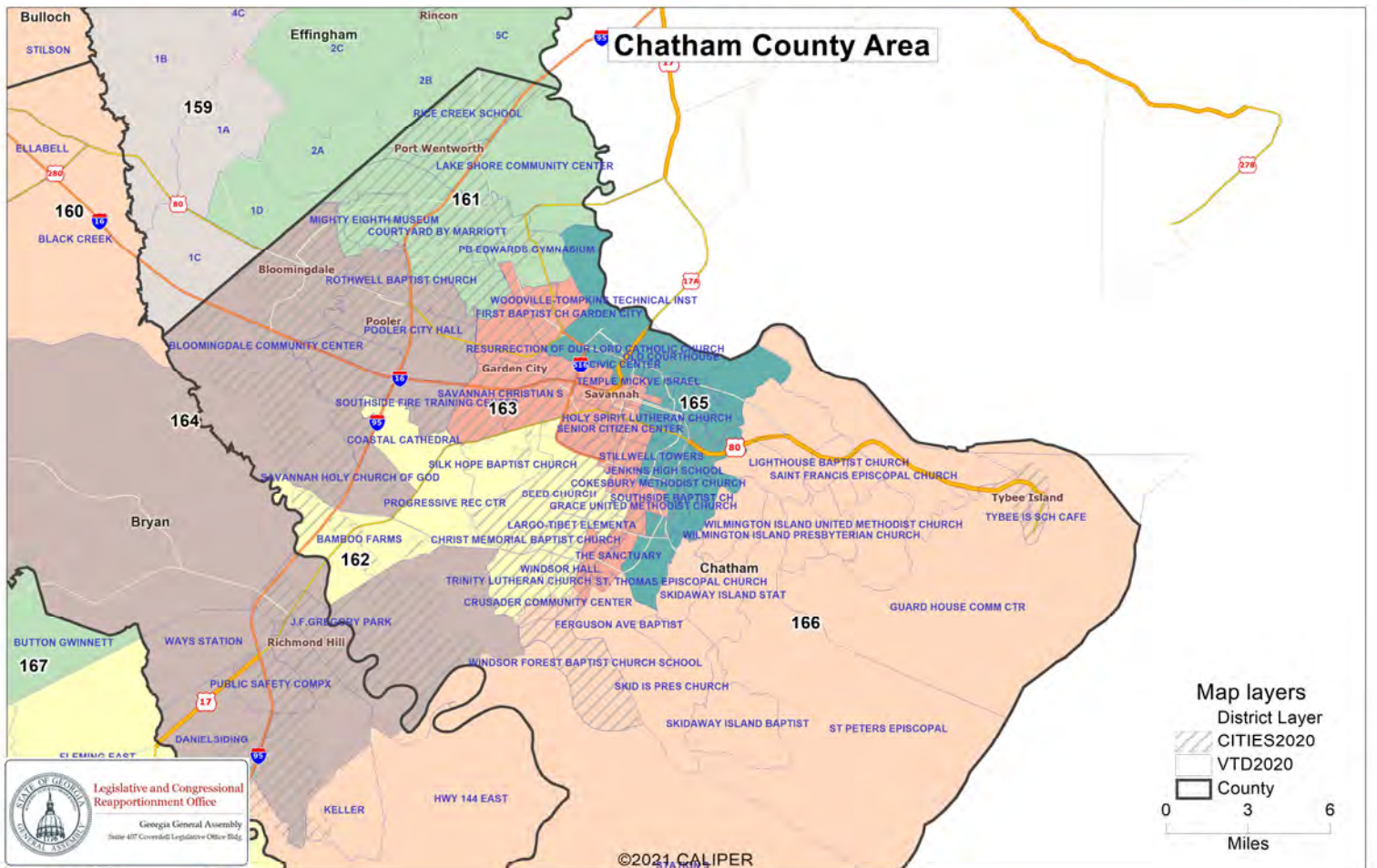
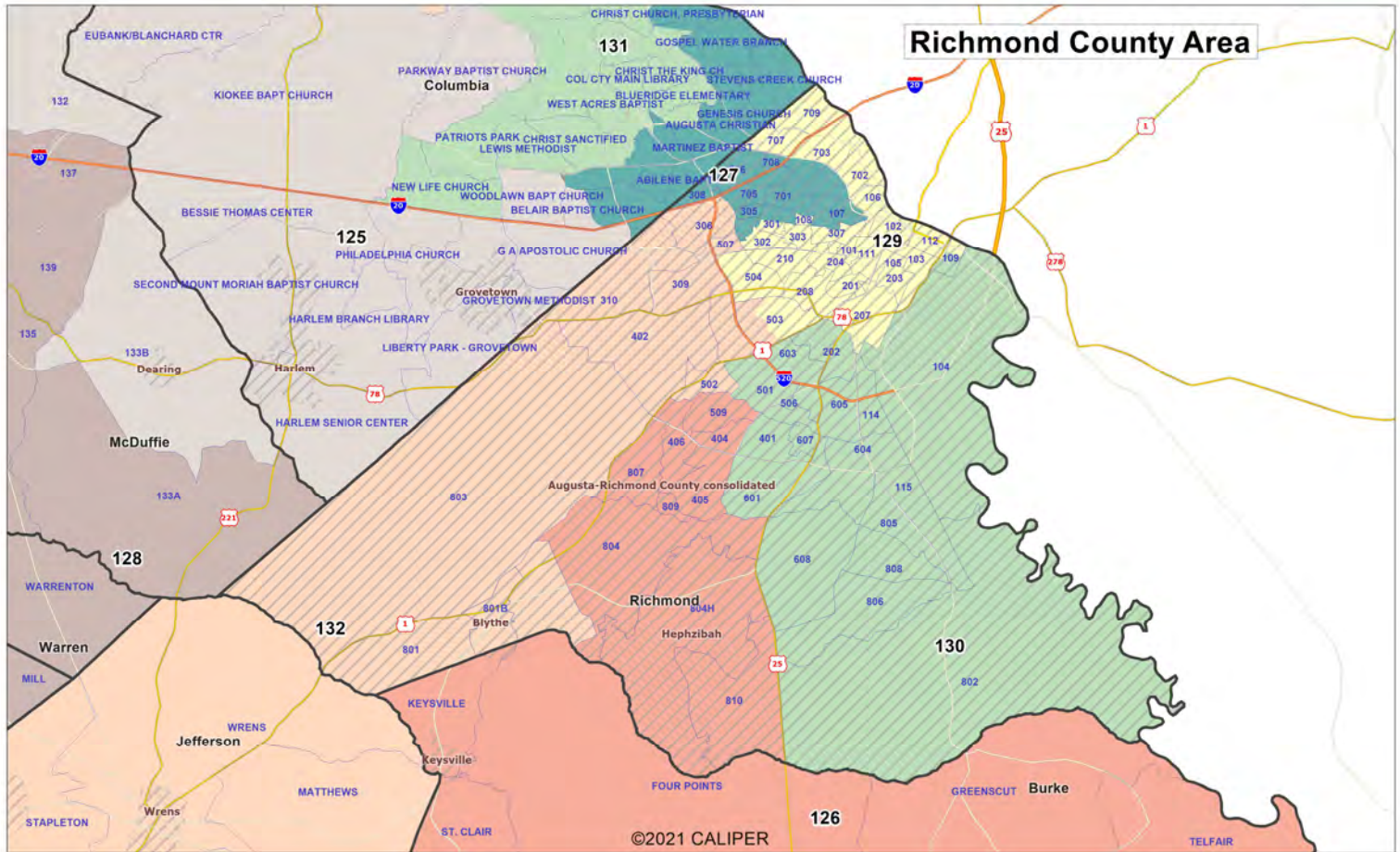
**Legislative and Congressional  
Reapportionment Office**

Georgia General Assembly  
Suite 407 Coverdell Legislative Office Bldg.



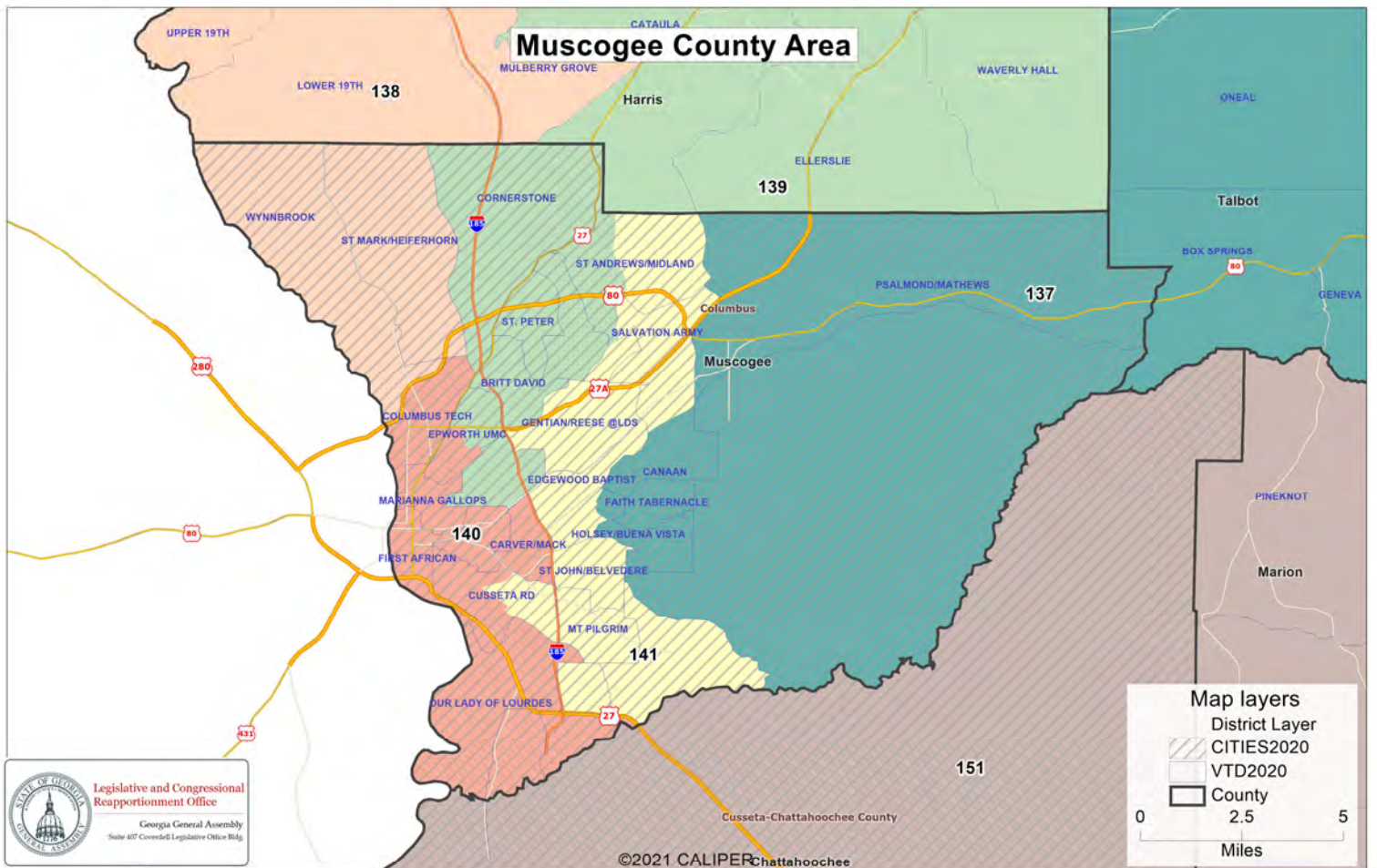
# Georgia House Districts- 2022

Client: State  
Plan: House-prop1-2021  
Type: House





## Bibb County Area





User: State

Plan Name: House-prop1-2021

Plan Type: House

## Population Summary

### Summary Statistics:

Population Range: 58,678 to 60,308  
 Ratio Range: 0.03  
 Absolute Range: -833 to 797  
 Absolute Overall Range: 1,630  
 Relative Range: -1.40% to 1.34%  
 Relative Overall Range: 2.74%  
 Absolute Mean Deviation: 363.71  
 Relative Mean Deviation: 0.61%  
 Standard Deviation: 417.67

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	59,666	155	0.26%	46,801	78.44%	87.88%	3.9%	2.59%	0.53%	0.31%	0.04%	0.3%	4.45%
002	59,773	262	0.44%	46,159	77.22%	83.24%	2.56%	9.09%	1.1%	0.18%	0.02%	0.26%	3.55%
003	60,199	688	1.16%	46,716	77.6%	86.9%	2.82%	3.6%	1.63%	0.27%	0.14%	0.18%	4.46%
004	59,070	-441	-0.74%	42,798	72.45%	42.01%	4.17%	50.07%	1.23%	0.17%	0.02%	0.28%	2.05%
005	58,837	-674	-1.13%	44,623	75.84%	75.46%	3.76%	15.29%	1.24%	0.2%	0.02%	0.22%	3.81%
006	59,712	201	0.34%	45,152	75.62%	80.15%	1.01%	14.51%	0.51%	0.2%	0.01%	0.2%	3.4%
007	59,081	-430	-0.72%	48,771	82.55%	87.97%	0.37%	7.43%	0.45%	0.26%	0.01%	0.24%	3.27%
008	59,244	-267	-0.45%	49,612	83.74%	90.8%	1.13%	3.21%	0.54%	0.3%	0.01%	0.34%	3.67%
009	59,474	-37	-0.06%	48,273	81.17%	87.78%	1.01%	5.49%	0.79%	0.37%	0.06%	0.36%	4.15%
010	59,519	8	0.01%	47,164	79.24%	78.61%	2.97%	13.11%	1.51%	0.17%	0.06%	0.24%	3.33%
011	58,792	-719	-1.21%	45,396	77.21%	87.43%	1.55%	5.33%	1.15%	0.22%	0.02%	0.3%	4%
012	59,300	-211	-0.35%	46,487	78.39%	78.45%	8.61%	7.68%	1.01%	0.16%	0.01%	0.42%	3.68%
013	59,150	-361	-0.61%	45,176	76.38%	62.24%	18.71%	13.52%	1.29%	0.22%	0.03%	0.33%	3.65%
014	59,135	-376	-0.63%	45,511	76.96%	81.38%	5.86%	7.04%	0.77%	0.21%	0.03%	0.34%	4.36%
015	59,213	-298	-0.50%	45,791	77.33%	68.38%	13.61%	11.74%	1.3%	0.25%	0.04%	0.49%	4.19%
016	59,402	-109	-0.18%	44,009	74.09%	72.9%	11.15%	10.95%	0.76%	0.22%	0.05%	0.43%	3.54%
017	59,120	-391	-0.66%	42,761	72.33%	63.28%	22.06%	7.9%	1.33%	0.23%	0.07%	0.64%	4.49%
018	59,335	-176	-0.30%	45,159	76.11%	84.78%	7.11%	2.93%	0.59%	0.23%	0.04%	0.35%	3.97%
019	58,955	-556	-0.93%	44,299	75.14%	62.06%	23.47%	7.87%	1.14%	0.25%	0.08%	0.64%	4.49%
020	60,107	596	1.00%	45,725	76.07%	73.93%	8.13%	10.6%	1.97%	0.16%	0.04%	0.63%	4.54%
021	59,529	18	0.03%	44,931	75.48%	80.04%	4.29%	8.54%	1.84%	0.19%	0.04%	0.66%	4.4%
022	59,460	-51	-0.09%	45,815	77.05%	62.53%	13.94%	13.26%	3.86%	0.2%	0.03%	0.81%	5.37%
023	59,048	-463	-0.78%	44,254	74.95%	71.47%	5.64%	17.19%	1.06%	0.22%	0.04%	0.36%	4.01%
024	59,011	-500	-0.84%	41,814	70.86%	60.13%	6%	11.36%	17.65%	0.21%	0.04%	0.62%	3.98%
025	59,414	-97	-0.16%	42,520	71.57%	51.99%	5%	5.42%	33.55%	0.15%	0.03%	0.51%	3.36%
026	59,248	-263	-0.44%	44,081	74.4%	63.48%	3.29%	12.07%	16.8%	0.18%	0.04%	0.5%	3.64%
027	58,795	-716	-1.20%	46,004	78.24%	79.69%	3.22%	11.82%	0.82%	0.19%	0.04%	0.3%	3.91%
028	58,972	-539	-0.91%	44,444	75.36%	76.5%	3.39%	13.59%	2.06%	0.16%	0.03%	0.4%	3.86%
029	59,200	-311	-0.52%	43,131	72.86%	36.05%	12.13%	46.28%	2.72%	0.12%	0.06%	0.41%	2.23%



## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
030	59,266	-245	-0.41%	45,414	76.63%	67.03%	7.37%	18.78%	3.04%	0.15%	0.03%	0.34%	3.26%
031	59,901	390	0.66%	43,120	71.99%	65.57%	6.64%	21.63%	2.27%	0.19%	0.02%	0.37%	3.31%
032	59,145	-366	-0.62%	45,942	77.68%	80.8%	7.24%	6.03%	1.26%	0.29%	0.05%	0.25%	4.09%
033	59,187	-324	-0.54%	46,498	78.56%	79.94%	10.97%	4.08%	1.2%	0.15%	0.01%	0.36%	3.29%
034	59,875	364	0.61%	45,758	76.42%	66.59%	14.46%	9.06%	4.41%	0.11%	0.04%	0.68%	4.65%
035	59,889	378	0.64%	48,312	80.67%	50.12%	26.55%	12.7%	4.43%	0.21%	0.04%	0.9%	5.04%
036	59,994	483	0.81%	44,911	74.86%	68.01%	16.01%	7.46%	3.07%	0.14%	0.03%	0.73%	4.55%
037	59,176	-335	-0.56%	46,223	78.11%	42.2%	26%	21.96%	4.5%	0.21%	0.03%	1%	4.11%
038	59,317	-194	-0.33%	44,839	75.59%	25.93%	52.72%	14.72%	1.77%	0.22%	0.07%	0.7%	3.88%
039	59,381	-130	-0.22%	44,436	74.83%	20.6%	52.08%	21.79%	1.5%	0.14%	0.03%	0.65%	3.2%
040	59,044	-467	-0.78%	47,976	81.25%	48.94%	30.78%	6.43%	8.54%	0.17%	0.02%	0.7%	4.43%
041	60,122	611	1.03%	45,271	75.3%	23.42%	36.44%	33.22%	2.81%	0.18%	0.05%	0.86%	3.02%
042	59,620	109	0.18%	48,525	81.39%	35.47%	31.18%	20.49%	7.11%	0.19%	0.03%	1.15%	4.37%
043	59,464	-47	-0.08%	47,033	79.09%	43.32%	24.35%	15.85%	7.83%	0.21%	0.09%	2.4%	5.96%
044	60,002	491	0.83%	46,773	77.95%	64.71%	10.98%	11.99%	5.71%	0.18%	0.02%	1.17%	5.24%
045	59,738	227	0.38%	44,023	73.69%	72.29%	4.14%	5.5%	12.94%	0.07%	0.02%	0.67%	4.38%
046	59,108	-403	-0.68%	44,132	74.66%	72.43%	6.76%	8.24%	6.93%	0.12%	0.04%	0.82%	4.66%
047	59,126	-385	-0.65%	43,932	74.3%	61.71%	9.44%	7.83%	15.91%	0.2%	0.03%	0.7%	4.17%
048	59,003	-508	-0.85%	44,779	75.89%	59.05%	10.16%	14.1%	11.77%	0.08%	0.05%	0.64%	4.16%
049	59,153	-358	-0.60%	45,263	76.52%	68.94%	7.2%	7.56%	11.41%	0.1%	0.02%	0.68%	4.09%
050	59,523	12	0.02%	43,940	73.82%	41.55%	11.04%	7.06%	35.46%	0.09%	0.04%	0.66%	4.1%
051	58,952	-559	-0.94%	47,262	80.17%	51.02%	21.93%	15.47%	5.83%	0.17%	0.04%	1.03%	4.51%
052	59,811	300	0.50%	48,525	81.13%	53.81%	13.71%	7.98%	19.72%	0.14%	0.06%	0.72%	3.86%
053	59,953	442	0.74%	46,944	78.3%	70.3%	12.31%	8.2%	4.46%	0.1%	0.02%	0.63%	3.98%
054	60,083	572	0.96%	50,338	83.78%	61.03%	12.98%	15.17%	6.51%	0.14%	0.03%	0.57%	3.56%
055	59,971	460	0.77%	49,255	82.13%	33.78%	54.54%	5.14%	2.85%	0.18%	0.03%	0.4%	3.09%
056	58,929	-582	-0.98%	52,757	89.53%	34.03%	46.33%	5.81%	9.32%	0.18%	0.07%	0.45%	3.8%
057	59,969	458	0.77%	52,097	86.87%	62.89%	15.57%	8.83%	7.58%	0.11%	0.02%	0.65%	4.36%
058	59,057	-454	-0.76%	50,514	85.53%	24.98%	63.09%	5.03%	2.76%	0.14%	0.03%	0.51%	3.45%
059	59,434	-77	-0.13%	49,179	82.75%	19.37%	69.55%	4.45%	2.52%	0.16%	0.02%	0.56%	3.36%
060	59,709	198	0.33%	45,490	76.19%	26.72%	61.76%	5.87%	2.04%	0.17%	0.05%	0.44%	2.96%
061	59,302	-209	-0.35%	45,447	76.64%	14.79%	71.51%	9.1%	0.87%	0.15%	0.06%	0.54%	2.98%
062	59,450	-61	-0.10%	46,426	78.09%	17.17%	70.09%	7.61%	1.13%	0.21%	0.04%	0.53%	3.22%
063	59,381	-130	-0.22%	45,043	75.85%	16.74%	68%	10.42%	1.32%	0.21%	0.03%	0.51%	2.78%
064	58,986	-525	-0.88%	44,189	74.91%	54.76%	29.35%	8.84%	1.37%	0.27%	0.03%	0.78%	4.6%
065	59,464	-47	-0.08%	44,386	74.64%	29.55%	60.08%	5.23%	1.08%	0.18%	0.06%	0.57%	3.27%
066	59,047	-464	-0.78%	44,278	74.99%	29.98%	52.03%	11.05%	1.72%	0.24%	0.07%	0.79%	4.11%
067	59,135	-376	-0.63%	44,299	74.91%	29.09%	57.14%	8.71%	1.29%	0.18%	0.03%	0.5%	3.06%
068	59,477	-34	-0.06%	44,835	75.38%	31.15%	54.67%	7.3%	2.79%	0.16%	0.04%	0.7%	3.19%
069	58,682	-829	-1.39%	45,548	77.62%	24.1%	61.87%	6.47%	3.04%	0.17%	0.04%	0.89%	3.41%
070	59,121	-390	-0.66%	45,249	76.54%	56.51%	27.61%	9.08%	2.17%	0.2%	0.05%	0.47%	3.9%
071	59,538	27	0.05%	44,582	74.88%	67.15%	18.89%	7.44%	0.96%	0.25%	0.02%	0.51%	4.78%
072	59,660	149	0.25%	46,229	77.49%	67.26%	19.34%	8.16%	0.96%	0.2%	0.02%	0.3%	3.75%
073	60,036	525	0.88%	45,736	76.18%	69.92%	11.27%	7.96%	5.88%	0.15%	0.03%	0.52%	4.26%



## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
074	58,956	-555	-0.93%	44,696	75.81%	61.32%	25.24%	6.67%	2.05%	0.2%	0.02%	0.52%	3.98%
075	59,743	232	0.39%	43,850	73.4%	9.24%	71.27%	12.97%	2.66%	0.19%	0.06%	0.71%	2.9%
076	59,759	248	0.42%	44,371	74.25%	8.61%	64.24%	15.61%	8.11%	0.19%	0.04%	0.57%	2.63%
077	59,242	-269	-0.45%	44,207	74.62%	6.22%	72.49%	14.22%	4.03%	0.22%	0.06%	0.5%	2.27%
078	59,044	-467	-0.78%	44,572	75.49%	12.69%	69.39%	9.94%	4.03%	0.19%	0.03%	0.65%	3.08%
079	59,500	-11	-0.02%	43,223	72.64%	5.69%	68.19%	18.11%	4.87%	0.21%	0.01%	0.57%	2.34%
080	59,461	-50	-0.08%	44,784	75.32%	45.02%	11.65%	26.17%	13.02%	0.08%	0.04%	0.63%	3.39%
081	59,007	-504	-0.85%	46,259	78.4%	44.28%	18.64%	24.58%	8.14%	0.14%	0.02%	0.55%	3.65%
082	59,724	213	0.36%	50,238	84.12%	61.86%	14.34%	7.52%	11.03%	0.11%	0.03%	0.65%	4.46%
083	59,416	-95	-0.16%	46,581	78.4%	44.13%	12.06%	33.75%	6.29%	0.1%	0.02%	0.61%	3.03%
084	59,862	351	0.59%	47,350	79.1%	21.11%	69.74%	3.4%	1.4%	0.16%	0.03%	0.59%	3.58%
085	59,373	-138	-0.23%	46,308	78%	17.08%	60.18%	5.99%	12.29%	0.25%	0.02%	0.68%	3.5%
086	59,205	-306	-0.51%	44,614	75.36%	10.6%	71.76%	4.64%	9.02%	0.15%	0.02%	0.67%	3.14%
087	59,709	198	0.33%	45,615	76.4%	11.48%	70.08%	7.73%	6.46%	0.21%	0.02%	0.7%	3.33%
088	59,689	178	0.30%	46,073	77.19%	15.98%	60.71%	11.46%	7.49%	0.23%	0.06%	0.68%	3.39%
089	59,866	355	0.60%	46,198	77.17%	30.38%	59.77%	3.8%	1.78%	0.15%	0.03%	0.48%	3.6%
090	59,812	301	0.51%	48,015	80.28%	32.08%	57.15%	4.65%	1.58%	0.12%	0.03%	0.62%	3.76%
091	60,050	539	0.91%	46,173	76.89%	19.7%	67.92%	7%	1.39%	0.17%	0.04%	0.54%	3.25%
092	60,273	762	1.28%	46,551	77.23%	20.98%	67.63%	5.49%	1.58%	0.16%	0.04%	0.74%	3.39%
093	60,118	607	1.02%	44,734	74.41%	19.94%	63.27%	11.24%	1.34%	0.16%	0.1%	0.69%	3.26%
094	59,211	-300	-0.50%	44,809	75.68%	16.38%	65.88%	8.72%	4.85%	0.19%	0.02%	0.58%	3.37%
095	60,030	519	0.87%	44,948	74.88%	18.79%	64.99%	9.32%	2.29%	0.19%	0.05%	0.73%	3.63%
096	59,515	4	0.01%	44,671	75.06%	17.47%	20.71%	40.49%	17.64%	0.15%	0.06%	0.72%	2.76%
097	59,072	-439	-0.74%	46,339	78.44%	33.19%	25.12%	21.86%	15%	0.19%	0.05%	0.68%	3.92%
098	59,998	487	0.82%	42,734	71.23%	9.69%	19.56%	57.42%	10.69%	0.13%	0.05%	0.6%	1.86%
099	59,850	339	0.57%	45,004	75.19%	39.77%	13.49%	9.52%	32.49%	0.15%	0.04%	0.56%	3.98%
100	60,030	519	0.87%	42,669	71.08%	55.88%	9.01%	10.85%	19.49%	0.18%	0.05%	0.53%	4.01%
101	59,938	427	0.72%	46,584	77.72%	37.36%	22.37%	20.17%	15.23%	0.16%	0.05%	0.7%	3.96%
102	58,959	-552	-0.93%	42,968	72.88%	26.79%	36.41%	23.45%	8.97%	0.22%	0.03%	0.69%	3.44%
103	60,197	686	1.15%	44,399	73.76%	49.51%	15.16%	19.06%	11.68%	0.13%	0.04%	0.61%	3.81%
104	59,362	-149	-0.25%	43,306	72.95%	60.44%	15.61%	12.64%	6.32%	0.16%	0.04%	0.6%	4.2%
105	59,344	-167	-0.28%	43,474	73.26%	38.89%	27.8%	18.1%	10.56%	0.1%	0.03%	0.65%	3.88%
106	59,112	-399	-0.67%	43,890	74.25%	36.66%	35.66%	12.66%	9.78%	0.17%	0.03%	0.81%	4.23%
107	59,702	191	0.32%	44,509	74.55%	19.03%	27.46%	34.49%	15.45%	0.16%	0.03%	0.64%	2.73%
108	59,577	66	0.11%	44,308	74.37%	38.96%	17.34%	20.98%	18.06%	0.17%	0.03%	0.67%	3.78%
109	59,630	119	0.20%	44,140	74.02%	13.5%	29.44%	39.32%	14.39%	0.14%	0.05%	0.63%	2.54%
110	59,951	440	0.74%	43,226	72.1%	32.7%	45.9%	11.87%	4.49%	0.18%	0.04%	0.84%	3.97%
111	60,009	498	0.84%	44,096	73.48%	60.53%	21.74%	10.37%	2.5%	0.18%	0.04%	0.73%	3.91%
112	59,349	-162	-0.27%	45,120	76.02%	71.55%	18.88%	4%	1.27%	0.2%	0.04%	0.47%	3.59%
113	60,053	542	0.91%	44,538	74.16%	28.82%	57.75%	7.78%	0.79%	0.14%	0.12%	0.62%	3.98%
114	59,867	356	0.60%	45,872	76.62%	66.9%	23.89%	4.53%	0.7%	0.18%	0.03%	0.45%	3.33%
115	60,174	663	1.11%	44,807	74.46%	33.12%	51.3%	7.88%	2.67%	0.17%	0.04%	0.81%	4%
116	59,913	402	0.68%	45,791	76.43%	23.87%	56.71%	8.14%	6.39%	0.18%	0.08%	0.83%	3.81%
117	60,130	619	1.04%	44,973	74.79%	51.61%	35.88%	6.28%	1.53%	0.17%	0.04%	0.59%	3.9%



## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
118	59,987	476	0.80%	46,342	77.25%	68.26%	22.55%	4.5%	0.43%	0.18%	0.02%	0.47%	3.59%
119	58,947	-564	-0.95%	44,005	74.65%	66.88%	12.47%	12.17%	3.83%	0.16%	0.02%	0.58%	3.89%
120	58,982	-529	-0.89%	46,767	79.29%	69.85%	13.48%	8.42%	4.05%	0.15%	0.05%	0.5%	3.49%
121	59,127	-384	-0.65%	46,598	78.81%	75.06%	8.66%	6.27%	5.64%	0.11%	0%	0.53%	3.73%
122	59,632	121	0.20%	48,840	81.9%	49.13%	30.63%	13.78%	2.13%	0.28%	0.06%	0.86%	3.13%
123	59,282	-229	-0.38%	46,572	78.56%	65.88%	23.82%	5.33%	1.14%	0.17%	0.02%	0.26%	3.39%
124	59,221	-290	-0.49%	47,638	80.44%	61.53%	26.06%	7.57%	1.14%	0.19%	0.02%	0.37%	3.12%
125	60,137	626	1.05%	43,812	72.85%	60%	21.67%	8.93%	2.4%	0.29%	0.19%	0.52%	5.99%
126	59,260	-251	-0.42%	45,497	76.78%	37.81%	53.88%	3.63%	0.76%	0.27%	0.15%	0.37%	3.13%
127	58,678	-833	-1.40%	45,889	78.2%	65.92%	17.12%	5.58%	5.63%	0.18%	0.18%	0.51%	4.88%
128	58,864	-647	-1.09%	46,488	78.98%	44.14%	51%	1.91%	0.36%	0.19%	0.03%	0.17%	2.22%
129	58,829	-682	-1.15%	46,873	79.68%	33.83%	54.95%	4.74%	2.1%	0.21%	0.14%	0.43%	3.6%
130	59,203	-308	-0.52%	44,019	74.35%	30.19%	60.27%	4.33%	0.79%	0.24%	0.16%	0.42%	3.6%
131	58,890	-621	-1.04%	42,968	72.96%	65.57%	15.99%	7.07%	4.92%	0.19%	0.14%	0.61%	5.51%
132	59,142	-369	-0.62%	46,752	79.05%	33.1%	51.88%	7.91%	2.38%	0.26%	0.19%	0.37%	3.91%
133	59,202	-309	-0.52%	47,222	79.76%	56.35%	37.05%	2.42%	1.12%	0.15%	0.04%	0.38%	2.48%
134	59,396	-115	-0.19%	45,110	75.95%	56.72%	34.18%	4.39%	0.74%	0.22%	0.02%	0.35%	3.37%
135	60,063	552	0.93%	46,725	77.79%	70.69%	22.83%	2.21%	0.51%	0.16%	0.01%	0.33%	3.25%
136	59,298	-213	-0.36%	45,367	76.51%	62.16%	28%	4.4%	1.54%	0.24%	0.03%	0.42%	3.21%
137	59,551	40	0.07%	45,358	76.17%	38.1%	51.27%	5.17%	1.66%	0.12%	0.14%	0.37%	3.17%
138	58,912	-599	-1.01%	45,684	77.55%	70.29%	18.77%	4.1%	2.39%	0.25%	0.06%	0.36%	3.77%
139	59,010	-501	-0.84%	45,522	77.14%	63.55%	19.18%	7.24%	4.03%	0.25%	0.21%	0.59%	4.96%
140	59,294	-217	-0.36%	44,411	74.9%	28.76%	55.8%	9.04%	1.02%	0.27%	0.24%	0.53%	4.34%
141	59,019	-492	-0.83%	44,677	75.7%	29.41%	54.88%	7.93%	2.53%	0.24%	0.3%	0.45%	4.25%
142	59,608	97	0.16%	44,584	74.8%	30.78%	60.48%	4.23%	1.29%	0.16%	0.01%	0.36%	2.68%
143	59,469	-42	-0.07%	46,390	78.01%	29.08%	61.66%	4.87%	0.97%	0.19%	0.05%	0.36%	2.82%
144	59,232	-279	-0.47%	46,370	78.29%	60.82%	29.32%	2.91%	3.46%	0.14%	0.02%	0.36%	2.97%
145	59,863	352	0.59%	45,844	76.58%	51.64%	35.66%	7.02%	0.9%	0.28%	0.04%	0.41%	4.05%
146	60,203	692	1.16%	44,589	74.06%	59.32%	26.73%	5.66%	2.67%	0.17%	0.09%	0.45%	4.91%
147	59,178	-333	-0.56%	44,902	75.88%	51.94%	29.55%	8.3%	4.76%	0.23%	0.07%	0.51%	4.64%
148	59,984	473	0.79%	46,614	77.71%	58.49%	33.89%	3.66%	0.9%	0.12%	0.04%	0.28%	2.63%
149	58,893	-618	-1.04%	46,821	79.5%	60.01%	31.14%	5.61%	0.57%	0.17%	0.03%	0.2%	2.28%
150	59,276	-235	-0.39%	47,050	79.37%	36.16%	53.23%	7.23%	1.17%	0.17%	0.03%	0.17%	1.85%
151	60,059	548	0.92%	46,973	78.21%	45.21%	42.21%	7.51%	1.29%	0.18%	0.23%	0.25%	3.12%
152	60,134	623	1.05%	46,026	76.54%	66.12%	25.86%	2.84%	1.6%	0.21%	0.03%	0.3%	3.03%
153	59,299	-212	-0.36%	45,692	77.05%	24.38%	69.08%	2.93%	0.89%	0.13%	0.02%	0.24%	2.33%
154	59,994	483	0.81%	47,273	78.8%	39.54%	55.53%	2.1%	0.38%	0.16%	0.01%	0.2%	2.09%
155	58,759	-752	-1.26%	45,208	76.94%	57.32%	36.14%	2.62%	0.91%	0.18%	0.05%	0.26%	2.52%
156	59,444	-67	-0.11%	45,867	77.16%	58.49%	29.79%	8.27%	0.6%	0.17%	0.01%	0.25%	2.42%
157	59,957	446	0.75%	45,311	75.57%	61.81%	23.59%	11.19%	0.54%	0.16%	0.04%	0.21%	2.47%
158	59,440	-71	-0.12%	45,549	76.63%	59.27%	31.5%	5.6%	0.75%	0.18%	0.03%	0.25%	2.42%
159	59,895	384	0.65%	44,871	74.92%	67.46%	23.88%	3.65%	0.54%	0.28%	0.03%	0.34%	3.82%
160	59,935	424	0.71%	48,057	80.18%	66.84%	21.68%	5.5%	1.62%	0.24%	0.1%	0.28%	3.76%
161	60,097	586	0.98%	44,371	73.83%	57.53%	25.83%	7.89%	3.03%	0.24%	0.09%	0.5%	4.9%



## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+ _Pop]	[% 18+ _Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
162	60,308	797	1.34%	46,733	77.49%	36.7%	43.34%	10.78%	4%	0.2%	0.24%	0.54%	4.19%
163	60,123	612	1.03%	48,461	80.6%	38.48%	46.14%	8.45%	3.12%	0.19%	0.13%	0.39%	3.1%
164	60,101	590	0.99%	45,851	76.29%	57.7%	22.03%	9.95%	4.21%	0.24%	0.12%	0.68%	5.08%
165	59,978	467	0.78%	48,247	80.44%	35.1%	52.41%	5.53%	3.19%	0.22%	0.14%	0.38%	3.02%
166	60,242	731	1.23%	47,580	78.98%	82.79%	4.94%	5.19%	2.65%	0.16%	0.05%	0.4%	3.82%
167	59,493	-18	-0.03%	44,140	74.19%	62.89%	20.99%	8.81%	1.42%	0.35%	0.23%	0.5%	4.79%
168	60,147	636	1.07%	44,867	74.6%	36.24%	43.3%	11.22%	1.98%	0.31%	0.67%	0.48%	5.79%
169	59,138	-373	-0.63%	45,267	76.54%	58.36%	28.84%	9.03%	0.79%	0.15%	0.02%	0.2%	2.6%
170	60,116	605	1.02%	45,316	75.38%	60.65%	24.39%	10.43%	1.19%	0.13%	0.02%	0.28%	2.91%
171	59,237	-274	-0.46%	45,969	77.6%	51.23%	39.79%	5.73%	0.54%	0.21%	0.03%	0.21%	2.26%
172	59,961	450	0.76%	44,756	74.64%	57.24%	23.26%	16%	0.77%	0.21%	0.03%	0.23%	2.27%
173	59,743	232	0.39%	45,292	75.81%	52.67%	36.22%	6.95%	0.79%	0.33%	0.02%	0.3%	2.72%
174	59,852	341	0.57%	45,760	76.46%	70.83%	16.91%	7.88%	0.47%	0.35%	0.04%	0.22%	3.3%
175	59,993	482	0.81%	44,704	74.52%	64.08%	23.75%	6.1%	1.78%	0.26%	0.07%	0.34%	3.64%
176	59,470	-41	-0.07%	44,991	75.65%	63.56%	21.74%	9.95%	0.91%	0.24%	0.08%	0.29%	3.23%
177	59,992	481	0.81%	46,014	76.7%	33.22%	54.7%	6.69%	1.26%	0.21%	0.07%	0.42%	3.42%
178	59,877	366	0.62%	45,638	76.22%	75.62%	14.4%	6.22%	0.52%	0.18%	0.01%	0.29%	2.76%
179	59,356	-155	-0.26%	47,156	79.45%	59.03%	28.39%	7.73%	1.06%	0.17%	0.13%	0.39%	3.11%
180	59,412	-99	-0.17%	45,362	76.35%	68.71%	16.96%	6.47%	1.56%	0.32%	0.11%	0.57%	5.3%

**Total: 10,711,908****Ideal District: 59,511**



User: State

Plan Name: House-prop1-2021

Plan Type: House

## Population Summary

### Summary Statistics:

Population Range:	58,678 to 60,308
Ratio Range:	0.03
Absolute Range:	-833 to 797
Absolute Overall Range:	1,630
Relative Range:	-1.40% to 1.34%
Relative Overall Range:	2.74%
Absolute Mean Deviation:	363.71
Relative Mean Deviation:	0.61%
Standard Deviation:	417.67

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	59,666	155	0.26%	46,801	78.44%	89.43%	3.65%	2.11%	0.57%	0.32%	0.05%	0.21%	3.65%
002	59,773	262	0.44%	46,159	77.22%	85.33%	2.64%	7.57%	1.07%	0.2%	0.02%	0.2%	2.97%
003	60,199	688	1.16%	46,716	77.6%	88.46%	2.71%	2.96%	1.56%	0.28%	0.14%	0.14%	3.77%
004	59,070	-441	-0.74%	42,798	72.45%	47.78%	4.53%	44.13%	1.28%	0.19%	0.02%	0.21%	1.86%
005	58,837	-674	-1.13%	44,623	75.84%	78.55%	3.81%	12.62%	1.26%	0.22%	0.03%	0.19%	3.31%
006	59,712	201	0.34%	45,152	75.62%	83%	1%	11.96%	0.51%	0.25%	0.02%	0.17%	3.09%
007	59,081	-430	-0.72%	48,771	82.55%	90.15%	0.34%	5.53%	0.46%	0.27%	0.01%	0.21%	3.02%
008	59,244	-267	-0.45%	49,612	83.74%	91.87%	1.12%	2.74%	0.54%	0.3%	0%	0.29%	3.13%
009	59,474	-37	-0.06%	48,273	81.17%	88.93%	1.06%	4.74%	0.83%	0.41%	0.06%	0.33%	3.64%
010	59,519	8	0.01%	47,164	79.24%	81.82%	3.19%	10.04%	1.58%	0.18%	0.03%	0.21%	2.95%
011	58,792	-719	-1.21%	45,396	77.21%	89.31%	1.43%	4.23%	1.06%	0.23%	0.03%	0.27%	3.44%
012	59,300	-211	-0.35%	46,487	78.39%	80.42%	8.94%	6.15%	1.01%	0.18%	0%	0.33%	2.97%
013	59,150	-361	-0.61%	45,176	76.38%	66.3%	18.03%	10.84%	1.36%	0.22%	0.02%	0.26%	2.97%
014	59,135	-376	-0.63%	45,511	76.96%	83.02%	6.06%	5.88%	0.8%	0.25%	0.02%	0.31%	3.65%
015	59,213	-298	-0.50%	45,791	77.33%	71.9%	13.11%	9.67%	1.36%	0.27%	0.03%	0.36%	3.3%
016	59,402	-109	-0.18%	44,009	74.09%	76.42%	10.83%	8.61%	0.79%	0.21%	0.05%	0.32%	2.76%
017	59,120	-391	-0.66%	42,761	72.33%	66.02%	21.24%	6.94%	1.41%	0.25%	0.06%	0.54%	3.55%
018	59,335	-176	-0.30%	45,159	76.11%	86.01%	7.17%	2.39%	0.62%	0.26%	0.04%	0.26%	3.24%
019	58,955	-556	-0.93%	44,299	75.14%	65.37%	22.26%	6.8%	1.21%	0.21%	0.07%	0.48%	3.59%
020	60,107	596	1.00%	45,725	76.07%	76.4%	7.96%	9.18%	2.03%	0.14%	0.04%	0.55%	3.7%
021	59,529	18	0.03%	44,931	75.48%	82.07%	4.23%	7.44%	1.87%	0.22%	0.05%	0.61%	3.51%
022	59,460	-51	-0.09%	45,815	77.05%	65.61%	13.32%	11.57%	4.04%	0.21%	0.03%	0.76%	4.47%
023	59,048	-463	-0.78%	44,254	74.95%	75.29%	5.48%	14.23%	1.12%	0.21%	0.05%	0.32%	3.3%
024	59,011	-500	-0.84%	41,814	70.86%	63.42%	6.04%	10.32%	16.41%	0.17%	0.05%	0.56%	3.03%
025	59,414	-97	-0.16%	42,520	71.57%	56.12%	5.08%	5.09%	30.56%	0.1%	0.03%	0.45%	2.56%
026	59,248	-263	-0.44%	44,081	74.4%	68.21%	3.18%	10.76%	14.26%	0.12%	0.04%	0.44%	2.99%
027	58,795	-716	-1.20%	46,004	78.24%	82.61%	3.07%	9.6%	0.83%	0.2%	0.04%	0.24%	3.4%
028	58,972	-539	-0.91%	44,444	75.36%	79.36%	3.15%	11.44%	2.16%	0.17%	0.03%	0.36%	3.33%



## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn ]	[% NH18+_Oth]	[% NH18+_ 2+ Races]
029	59,200	-311	-0.52%	43,131	72.86%	42.29%	12.55%	39.71%	3.02%	0.14%	0.06%	0.33%	1.91%
030	59,266	-245	-0.41%	45,414	76.63%	70.5%	7.19%	16.13%	2.96%	0.15%	0.02%	0.28%	2.77%
031	59,901	390	0.66%	43,120	71.99%	68.65%	6.79%	18.95%	2.35%	0.21%	0.03%	0.32%	2.69%
032	59,145	-366	-0.62%	45,942	77.68%	82.98%	7.21%	4.87%	1.25%	0.32%	0.05%	0.2%	3.12%
033	59,187	-324	-0.54%	46,498	78.56%	82.25%	10.57%	3.13%	1.16%	0.15%	0.01%	0.29%	2.43%
034	59,875	364	0.61%	45,758	76.42%	69.23%	14.11%	7.85%	4.43%	0.12%	0.03%	0.65%	3.58%
035	59,889	378	0.64%	48,312	80.67%	53.63%	25.59%	11.15%	4.58%	0.19%	0.05%	0.77%	4.04%
036	59,994	483	0.81%	44,911	74.86%	70.77%	15.48%	6.51%	3.02%	0.15%	0.04%	0.6%	3.44%
037	59,176	-335	-0.56%	46,223	78.11%	46.26%	25.84%	18.64%	4.61%	0.21%	0.02%	0.91%	3.52%
038	59,317	-194	-0.33%	44,839	75.59%	30.1%	51.13%	12.62%	1.87%	0.24%	0.05%	0.63%	3.36%
039	59,381	-130	-0.22%	44,436	74.83%	23.47%	52.5%	18.66%	1.77%	0.17%	0.03%	0.6%	2.79%
040	59,044	-467	-0.78%	47,976	81.25%	51.14%	30.35%	5.92%	8.24%	0.15%	0.01%	0.63%	3.55%
041	60,122	611	1.03%	45,271	75.3%	27.62%	36.96%	28.55%	3.13%	0.22%	0.05%	0.84%	2.62%
042	59,620	109	0.18%	48,525	81.39%	39%	30.85%	17.38%	7.45%	0.2%	0.04%	1.14%	3.94%
043	59,464	-47	-0.08%	47,033	79.09%	46.31%	24.03%	14.15%	7.62%	0.21%	0.09%	2.27%	5.32%
044	60,002	491	0.83%	46,773	77.95%	67.69%	10.5%	10.53%	5.78%	0.2%	0.02%	1.06%	4.23%
045	59,738	227	0.38%	44,023	73.69%	74.94%	4.27%	4.85%	12.05%	0.05%	0.02%	0.59%	3.23%
046	59,108	-403	-0.68%	44,132	74.66%	74.81%	6.79%	7.38%	6.72%	0.13%	0.04%	0.61%	3.53%
047	59,126	-385	-0.65%	43,932	74.3%	63.89%	9.3%	7.37%	15.16%	0.17%	0.03%	0.62%	3.46%
048	59,003	-508	-0.85%	44,779	75.89%	61.77%	10.14%	12.41%	11.59%	0.08%	0.04%	0.56%	3.42%
049	59,153	-358	-0.60%	45,263	76.52%	71.48%	7.22%	6.7%	10.74%	0.1%	0.03%	0.63%	3.12%
050	59,523	12	0.02%	43,940	73.82%	44.37%	10.8%	6.36%	34.63%	0.07%	0.05%	0.58%	3.13%
051	58,952	-559	-0.94%	47,262	80.17%	54.33%	21.3%	13.31%	5.93%	0.18%	0.05%	1.01%	3.89%
052	59,811	300	0.50%	48,525	81.13%	55.14%	14.19%	7.41%	19.12%	0.14%	0.07%	0.68%	3.24%
053	59,953	442	0.74%	46,944	78.3%	71.2%	12.71%	7.44%	4.58%	0.09%	0.02%	0.54%	3.41%
054	60,083	572	0.96%	50,338	83.78%	62.98%	13.67%	12.79%	6.86%	0.13%	0.03%	0.53%	3.02%
055	59,971	460	0.77%	49,255	82.13%	35.51%	52.85%	4.97%	3.19%	0.18%	0.04%	0.37%	2.88%
056	58,929	-582	-0.98%	52,757	89.53%	36.98%	42.9%	5.84%	9.92%	0.2%	0.08%	0.41%	3.67%
057	59,969	458	0.77%	52,097	86.87%	63.64%	16.18%	7.95%	7.99%	0.1%	0.02%	0.6%	3.52%
058	59,057	-454	-0.76%	50,514	85.53%	27.56%	60.36%	5.07%	3.04%	0.12%	0.04%	0.51%	3.3%
059	59,434	-77	-0.13%	49,179	82.75%	22.04%	66.72%	4.43%	2.9%	0.17%	0.02%	0.54%	3.18%
060	59,709	198	0.33%	45,490	76.19%	28.09%	61.3%	5.11%	2.17%	0.18%	0.05%	0.43%	2.67%
061	59,302	-209	-0.35%	45,447	76.64%	16.75%	71.33%	7.61%	0.97%	0.17%	0.05%	0.51%	2.6%
062	59,450	-61	-0.10%	46,426	78.09%	19.07%	69.19%	6.83%	1.3%	0.21%	0.05%	0.47%	2.88%
063	59,381	-130	-0.22%	45,043	75.85%	19.22%	66.7%	9.26%	1.54%	0.21%	0.04%	0.47%	2.56%
064	58,986	-525	-0.88%	44,189	74.91%	57.83%	28.63%	7.44%	1.41%	0.3%	0.04%	0.7%	3.67%
065	59,464	-47	-0.08%	44,386	74.64%	31.46%	59.19%	4.53%	1.15%	0.19%	0.05%	0.51%	2.92%
066	59,047	-464	-0.78%	44,278	74.99%	33.93%	50.39%	9.49%	1.86%	0.26%	0.08%	0.63%	3.36%
067	59,135	-376	-0.63%	44,299	74.91%	30.86%	56.59%	7.75%	1.39%	0.19%	0.03%	0.49%	2.7%
068	59,477	-34	-0.06%	44,835	75.38%	33.94%	53.42%	6.33%	2.77%	0.14%	0.05%	0.63%	2.72%
069	58,682	-829	-1.39%	45,548	77.62%	26.89%	60.9%	5.42%	3.12%	0.18%	0.04%	0.78%	2.68%
070	59,121	-390	-0.66%	45,249	76.54%	59.69%	26.23%	7.96%	2.23%	0.22%	0.06%	0.4%	3.22%
071	59,538	27	0.05%	44,582	74.88%	69.8%	18.45%	6.18%	1.01%	0.24%	0.02%	0.42%	3.88%



## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn ]	[% NH18+_Oth]	[% NH18+_ 2+ Races]
072	59,660	149	0.25%	46,229	77.49%	69.24%	19.51%	6.94%	0.93%	0.19%	0.02%	0.23%	2.94%
073	60,036	525	0.88%	45,736	76.18%	72.58%	10.84%	7.05%	5.58%	0.14%	0.03%	0.4%	3.38%
074	58,956	-555	-0.93%	44,696	75.81%	64.44%	24%	5.55%	2.04%	0.21%	0.02%	0.47%	3.26%
075	59,743	232	0.39%	43,850	73.4%	11.27%	71.04%	11.28%	2.93%	0.18%	0.07%	0.66%	2.57%
076	59,759	248	0.42%	44,371	74.25%	10.51%	64.4%	13.23%	8.69%	0.21%	0.05%	0.51%	2.41%
077	59,242	-269	-0.45%	44,207	74.62%	7.58%	73.27%	12.2%	4.36%	0.23%	0.06%	0.41%	1.9%
078	59,044	-467	-0.78%	44,572	75.49%	15.05%	68.35%	8.89%	4.21%	0.2%	0.03%	0.63%	2.63%
079	59,500	-11	-0.02%	43,223	72.64%	7.15%	68.44%	16.03%	5.51%	0.2%	0.01%	0.56%	2.09%
080	59,461	-50	-0.08%	44,784	75.32%	47.63%	12.45%	23.12%	13.33%	0.07%	0.04%	0.56%	2.79%
081	59,007	-504	-0.85%	46,259	78.4%	47.01%	19.77%	20.92%	8.71%	0.14%	0.01%	0.46%	2.98%
082	59,724	213	0.36%	50,238	84.12%	62.46%	15.19%	6.79%	11.35%	0.11%	0.04%	0.56%	3.51%
083	59,416	-95	-0.16%	46,581	78.4%	47.9%	13.51%	28.47%	6.91%	0.1%	0.02%	0.55%	2.55%
084	59,862	351	0.59%	47,350	79.1%	21.29%	70.47%	2.96%	1.48%	0.16%	0.02%	0.55%	3.07%
085	59,373	-138	-0.23%	46,308	78%	19.48%	59.85%	5.92%	10.8%	0.21%	0.02%	0.57%	3.14%
086	59,205	-306	-0.51%	44,614	75.36%	12.08%	72.02%	4.29%	7.95%	0.15%	0.01%	0.65%	2.84%
087	59,709	198	0.33%	45,615	76.4%	13.5%	69.72%	6.69%	6.22%	0.24%	0.02%	0.64%	2.97%
088	59,689	178	0.30%	46,073	77.19%	18.3%	60.15%	9.97%	7.64%	0.22%	0.07%	0.64%	3.01%
089	59,866	355	0.60%	46,198	77.17%	31.07%	60.06%	3.42%	1.92%	0.15%	0.03%	0.41%	2.93%
090	59,812	301	0.51%	48,015	80.28%	33.98%	56.05%	4.26%	1.82%	0.12%	0.03%	0.53%	3.2%
091	60,050	539	0.91%	46,173	76.89%	22%	67.15%	5.86%	1.44%	0.15%	0.05%	0.49%	2.86%
092	60,273	762	1.28%	46,551	77.23%	24.05%	65.71%	4.68%	1.67%	0.17%	0.03%	0.61%	3.08%
093	60,118	607	1.02%	44,734	74.41%	22.91%	62.36%	9.58%	1.48%	0.17%	0.09%	0.61%	2.81%
094	59,211	-300	-0.50%	44,809	75.68%	18.42%	65.61%	7.29%	4.85%	0.19%	0.02%	0.54%	3.07%
095	60,030	519	0.87%	44,948	74.88%	21.83%	63.61%	7.94%	2.43%	0.22%	0.04%	0.67%	3.27%
096	59,515	4	0.01%	44,671	75.06%	20.32%	20.75%	36.03%	19.7%	0.11%	0.04%	0.6%	2.44%
097	59,072	-439	-0.74%	46,339	78.44%	36.44%	24.16%	19.23%	16.07%	0.19%	0.05%	0.6%	3.25%
098	59,998	487	0.82%	42,734	71.23%	11.66%	20.91%	52.77%	12.28%	0.12%	0.05%	0.51%	1.71%
099	59,850	339	0.57%	45,004	75.19%	42.1%	13.07%	8.67%	32.63%	0.13%	0.04%	0.48%	2.89%
100	60,030	519	0.87%	42,669	71.08%	59.05%	8.86%	9.98%	18.41%	0.19%	0.06%	0.43%	3.02%
101	59,938	427	0.72%	46,584	77.72%	40.14%	21.87%	18.24%	15.98%	0.16%	0.05%	0.54%	3.02%
102	58,959	-552	-0.93%	42,968	72.88%	30.65%	34.79%	21.34%	9.57%	0.2%	0.03%	0.52%	2.89%
103	60,197	686	1.15%	44,399	73.76%	52.42%	15.01%	16.89%	12.19%	0.12%	0.03%	0.5%	2.83%
104	59,362	-149	-0.25%	43,306	72.95%	62.96%	15.44%	11.14%	6.38%	0.18%	0.05%	0.51%	3.34%
105	59,344	-167	-0.28%	43,474	73.26%	41.74%	26.67%	16.76%	11.05%	0.1%	0.03%	0.54%	3.12%
106	59,112	-399	-0.67%	43,890	74.25%	41.22%	33.7%	11.14%	9.73%	0.16%	0.03%	0.74%	3.28%
107	59,702	191	0.32%	44,509	74.55%	21.96%	27.02%	31.09%	16.75%	0.18%	0.04%	0.56%	2.4%
108	59,577	66	0.11%	44,308	74.37%	43.36%	16.55%	18.16%	18.34%	0.18%	0.04%	0.53%	2.84%
109	59,630	119	0.20%	44,140	74.02%	15.44%	29.65%	36.12%	15.82%	0.12%	0.06%	0.55%	2.25%
110	59,951	440	0.74%	43,226	72.1%	36.58%	44.02%	10.49%	4.72%	0.18%	0.04%	0.72%	3.25%
111	60,009	498	0.84%	44,096	73.48%	64%	20.56%	8.84%	2.56%	0.2%	0.04%	0.64%	3.17%
112	59,349	-162	-0.27%	45,120	76.02%	73.73%	18.26%	3.28%	1.26%	0.22%	0.02%	0.41%	2.81%
113	60,053	542	0.91%	44,538	74.16%	31.8%	56.48%	6.65%	0.83%	0.15%	0.11%	0.59%	3.39%
114	59,867	356	0.60%	45,872	76.62%	68.84%	23.42%	3.73%	0.71%	0.18%	0.01%	0.35%	2.76%



## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn ]	[% NH18+_Oth]	[% NH18+_ 2+ Races]
115	60,174	663	1.11%	44,807	74.46%	36.95%	49.2%	6.97%	2.68%	0.2%	0.05%	0.69%	3.26%
116	59,913	402	0.68%	45,791	76.43%	27.22%	54.93%	7.29%	6.48%	0.19%	0.09%	0.74%	3.05%
117	60,130	619	1.04%	44,973	74.79%	54.5%	34.54%	5.44%	1.54%	0.19%	0.04%	0.52%	3.22%
118	59,987	476	0.80%	46,342	77.25%	69.73%	22.7%	3.68%	0.42%	0.2%	0.02%	0.39%	2.85%
119	58,947	-564	-0.95%	44,005	74.65%	69.8%	12.31%	10.44%	3.75%	0.17%	0.02%	0.43%	3.08%
120	58,982	-529	-0.89%	46,767	79.29%	71.94%	13.21%	7.09%	4.18%	0.16%	0.05%	0.44%	2.91%
121	59,127	-384	-0.65%	46,598	78.81%	76.13%	8.6%	5.57%	5.84%	0.1%	0%	0.46%	3.3%
122	59,632	121	0.20%	48,840	81.9%	54.8%	27.13%	11.7%	2.41%	0.32%	0.06%	0.79%	2.79%
123	59,282	-229	-0.38%	46,572	78.56%	68.06%	23.42%	4.31%	1.06%	0.19%	0.02%	0.2%	2.75%
124	59,221	-290	-0.49%	47,638	80.44%	65.01%	24.61%	6.17%	1.08%	0.19%	0.02%	0.31%	2.61%
125	60,137	626	1.05%	43,812	72.85%	63.03%	21.43%	7.66%	2.6%	0.31%	0.16%	0.39%	4.41%
126	59,260	-251	-0.42%	45,497	76.78%	39.97%	52.63%	3.17%	0.89%	0.29%	0.16%	0.29%	2.62%
127	58,678	-833	-1.40%	45,889	78.2%	68.13%	16.88%	4.77%	5.68%	0.19%	0.16%	0.43%	3.77%
128	58,864	-647	-1.09%	46,488	78.98%	46.49%	49.38%	1.7%	0.35%	0.19%	0.01%	0.17%	1.71%
129	58,829	-682	-1.15%	46,873	79.68%	37.16%	52.33%	4.26%	2.4%	0.19%	0.15%	0.41%	3.1%
130	59,203	-308	-0.52%	44,019	74.35%	33.74%	57.69%	3.86%	0.97%	0.26%	0.19%	0.34%	2.95%
131	58,890	-621	-1.04%	42,968	72.96%	68.16%	15.87%	5.87%	5.21%	0.21%	0.1%	0.55%	4.03%
132	59,142	-369	-0.62%	46,752	79.05%	35.63%	49.82%	7.8%	2.74%	0.27%	0.16%	0.3%	3.28%
133	59,202	-309	-0.52%	47,222	79.76%	58.39%	35.87%	2.15%	1.15%	0.15%	0.04%	0.36%	1.89%
134	59,396	-115	-0.19%	45,110	75.95%	59.9%	32.37%	3.74%	0.81%	0.23%	0.02%	0.25%	2.69%
135	60,063	552	0.93%	46,725	77.79%	71.78%	22.84%	1.82%	0.55%	0.16%	0.01%	0.25%	2.57%
136	59,298	-213	-0.36%	45,367	76.51%	63.9%	27.76%	3.64%	1.55%	0.26%	0.04%	0.29%	2.55%
137	59,551	40	0.07%	45,358	76.17%	40.82%	50.02%	4.48%	1.73%	0.12%	0.12%	0.26%	2.44%
138	58,912	-599	-1.01%	45,684	77.55%	72.34%	18.26%	3.31%	2.43%	0.26%	0.07%	0.35%	2.97%
139	59,010	-501	-0.84%	45,522	77.14%	66.19%	18.56%	6.36%	3.89%	0.25%	0.24%	0.46%	4.04%
140	59,294	-217	-0.36%	44,411	74.9%	31.7%	54.74%	8.02%	1.17%	0.24%	0.2%	0.49%	3.43%
141	59,019	-492	-0.83%	44,677	75.7%	31.77%	54.65%	6.55%	2.69%	0.27%	0.3%	0.38%	3.38%
142	59,608	97	0.16%	44,584	74.8%	34.8%	57.42%	3.7%	1.4%	0.17%	0.02%	0.28%	2.2%
143	59,469	-42	-0.07%	46,390	78.01%	32.28%	58.98%	4.67%	1.07%	0.21%	0.05%	0.3%	2.44%
144	59,232	-279	-0.47%	46,370	78.29%	62.95%	28.34%	2.55%	3.45%	0.14%	0.02%	0.26%	2.29%
145	59,863	352	0.59%	45,844	76.58%	55.12%	33.97%	5.94%	0.99%	0.33%	0.03%	0.3%	3.32%
146	60,203	692	1.16%	44,589	74.06%	61.84%	26.08%	4.73%	2.98%	0.18%	0.09%	0.39%	3.71%
147	59,178	-333	-0.56%	44,902	75.88%	55.32%	28.41%	7.17%	4.85%	0.25%	0.07%	0.41%	3.52%
148	59,984	473	0.79%	46,614	77.71%	60.45%	33.11%	3.08%	0.87%	0.14%	0.04%	0.21%	2.1%
149	58,893	-618	-1.04%	46,821	79.5%	60.99%	30.75%	5.69%	0.57%	0.19%	0.04%	0.14%	1.63%
150	59,276	-235	-0.39%	47,050	79.37%	38.31%	52.5%	6.13%	1.18%	0.16%	0.03%	0.15%	1.54%
151	60,059	548	0.92%	46,973	78.21%	47.2%	40.96%	7.28%	1.43%	0.18%	0.18%	0.19%	2.58%
152	60,134	623	1.05%	46,026	76.54%	67.94%	25.26%	2.34%	1.52%	0.24%	0.04%	0.19%	2.46%
153	59,299	-212	-0.36%	45,692	77.05%	27.66%	66.38%	2.55%	1%	0.16%	0.03%	0.23%	2.01%
154	59,994	483	0.81%	47,273	78.8%	42.24%	53.68%	1.67%	0.36%	0.19%	0%	0.16%	1.7%
155	58,759	-752	-1.26%	45,208	76.94%	59.77%	34.6%	2.22%	0.95%	0.16%	0.04%	0.21%	2.05%
156	59,444	-67	-0.11%	45,867	77.16%	60.92%	29.32%	6.88%	0.62%	0.16%	0.01%	0.15%	1.93%
157	59,957	446	0.75%	45,311	75.57%	64.48%	23.7%	8.96%	0.57%	0.17%	0.04%	0.16%	1.93%



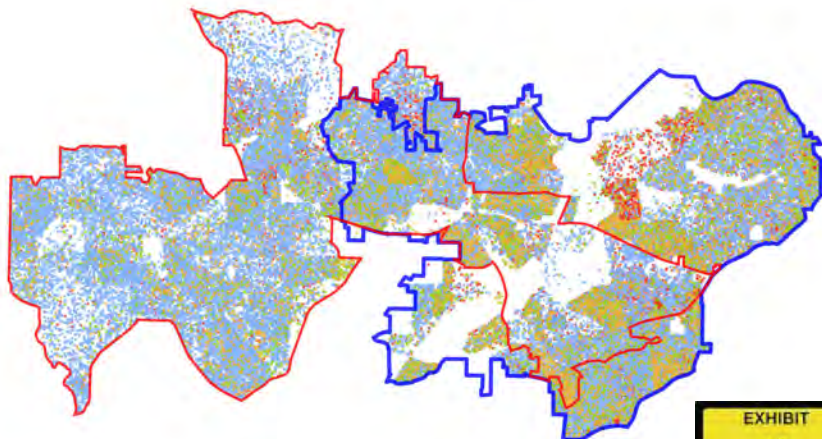
## Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn ]	[% NH18+_Oth]	[% NH18+_2+ Races]
158	59,440	-71	-0.12%	45,549	76.63%	62.21%	30.2%	4.52%	0.71%	0.21%	0.03%	0.18%	1.93%
159	59,895	384	0.65%	44,871	74.92%	69.39%	23.44%	2.87%	0.57%	0.31%	0.04%	0.26%	3.12%
160	59,935	424	0.71%	48,057	80.18%	68.48%	21.07%	5.04%	1.64%	0.24%	0.09%	0.27%	3.17%
161	60,097	586	0.98%	44,371	73.83%	60.16%	25.26%	6.82%	3.16%	0.25%	0.09%	0.48%	3.77%
162	60,308	797	1.34%	46,733	77.49%	40.62%	41.13%	9.58%	4.16%	0.22%	0.24%	0.44%	3.61%
163	60,123	612	1.03%	48,461	80.6%	41.92%	43.78%	7.38%	3.6%	0.2%	0.1%	0.33%	2.68%
164	60,101	590	0.99%	45,851	76.29%	60.61%	21.43%	8.49%	4.37%	0.26%	0.12%	0.6%	4.12%
165	59,978	467	0.78%	48,247	80.44%	39.18%	48.49%	5.33%	3.68%	0.25%	0.14%	0.35%	2.57%
166	60,242	731	1.23%	47,580	78.98%	84.71%	4.96%	4.07%	2.69%	0.18%	0.05%	0.36%	2.97%
167	59,493	-18	-0.03%	44,140	74.19%	65.96%	20.55%	7.41%	1.48%	0.39%	0.18%	0.39%	3.66%
168	60,147	636	1.07%	44,867	74.6%	39.29%	42.28%	10.3%	2.32%	0.33%	0.65%	0.38%	4.46%
169	59,138	-373	-0.63%	45,267	76.54%	60.95%	28.12%	7.66%	0.88%	0.14%	0.03%	0.16%	2.06%
170	60,116	605	1.02%	45,316	75.38%	64.17%	23.21%	8.65%	1.19%	0.12%	0.02%	0.25%	2.38%
171	59,237	-274	-0.46%	45,969	77.6%	53.85%	38.58%	4.63%	0.56%	0.24%	0.02%	0.17%	1.95%
172	59,961	450	0.76%	44,756	74.64%	61.03%	22.46%	13.42%	0.78%	0.23%	0.03%	0.19%	1.87%
173	59,743	232	0.39%	45,292	75.81%	55.68%	35.18%	5.35%	0.84%	0.37%	0.02%	0.26%	2.31%
174	59,852	341	0.57%	45,760	76.46%	72.25%	16.08%	7.96%	0.52%	0.38%	0.03%	0.15%	2.64%
175	59,993	482	0.81%	44,704	74.52%	66.49%	23.13%	5.03%	1.85%	0.28%	0.06%	0.3%	2.86%
176	59,470	-41	-0.07%	44,991	75.65%	66.15%	21.61%	8.24%	0.96%	0.25%	0.1%	0.19%	2.49%
177	59,992	481	0.81%	46,014	76.7%	37.12%	51.68%	6.12%	1.36%	0.24%	0.08%	0.36%	3.04%
178	59,877	366	0.62%	45,638	76.22%	77.79%	13.99%	5.14%	0.54%	0.2%	0.01%	0.23%	2.09%
179	59,356	-155	-0.26%	47,156	79.45%	63.69%	25.74%	6.38%	1.07%	0.15%	0.11%	0.34%	2.51%
180	59,412	-99	-0.17%	45,362	76.35%	71.17%	16.63%	5.62%	1.67%	0.31%	0.11%	0.47%	4.02%

**Total: 10,711,908****Ideal District: 59,511**



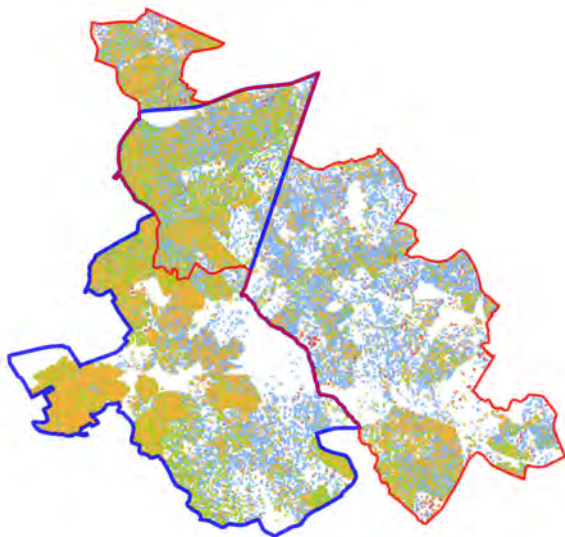


EXHIBIT

12

● Asian    ● White    ● Black    ● Latino    ● = 1 person



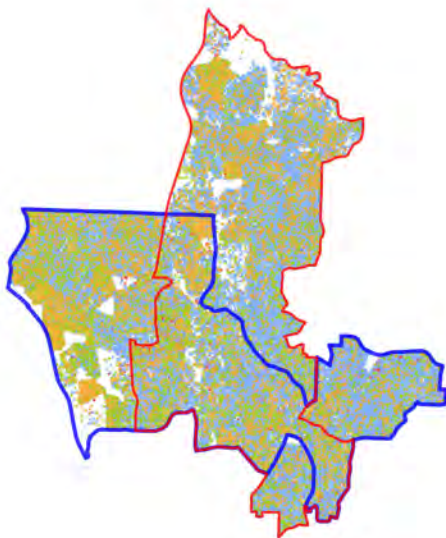


EXHIBIT

13

● Asian    ● White    ● Black    ● Latino    ● = 1 person





EXHIBIT

14

● Asian    ● White    ● Black    ● Latino    ● = 1 person