

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ANNIE LOIS GRANT; QUENTIN T.
HOWELL; ELROY TOLBERT; TRIANA
ARNOLD JAMES; EUNICE SYKES;
ELBERT SOLOMON; DEXTER
WIMBISH; GARRETT REYNOLDS;
JACQUELINE FAYE ARBUTHNOT;
JACQUELYN BUSH; and MARY NELL
CONNER,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official
capacity as the Georgia Secretary of State;
WILLIAM S. DUFFEY, JR., in his official
capacity as chair of the State Election
Board; MATTHEW MASHBURN, in his
official capacity as a member of the State
Election Board; SARA TINDALL
GHAZAL, in her official capacity as a
member of the State Election Board;
EDWARD LINDSEY, in his official
capacity as a member of the State Election
Board; and JANICE W. JOHNSTON, in
her official capacity as a member of the
State Election Board,

Defendants.

CIVIL ACTION FILE
NO. 1:22-CV-00122-SCJ

**DECLARATION OF JONATHAN P. HAWLEY IN OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Jonathan P. Hawley, hereby declare under penalty of perjury under the laws of the United States as follows:

1. I am over the age of 18 and competent to make this declaration. I am an associate with the law firm Elias Law Group LLP and am admitted to practice law in the States of Washington, California, and Montana and the District of Columbia and before multiple federal courts of appeals and district courts. I am admitted in this Court *pro hac vice* in the above-captioned matter as counsel for Plaintiffs. I submit this declaration to provide to the Court true and correct copies of certain documents submitted in opposition to Defendants' motion for summary judgment.

Exhibit 1 is a true and correct copy of the expert report of Blakeman B. Esselstyn, dated December 5, 2022.

Exhibit 2 is a true and correct copy of the expert report of Dr. Maxwell Palmer, dated December 12, 2022.

Exhibit 3 is a true and correct copy of the supplemental expert report of Dr. Maxwell Palmer, dated December 22, 2022.

Exhibit 4 is a true and correct copy of the expert report of Dr. Orville Vernon Burton, dated December 5, 2022.

Exhibit 5 is a true and correct copy of the rebuttal expert report of John B. Morgan, dated January 23, 2023.

Exhibit 6 is a true and correct copy of the expert report of Dr. John R. Alford, dated February 6, 2023.

Exhibit 7 is a true and correct copy of excerpts from the deposition transcript of Blakeman B. Esselstyn, *see* ECF No. 179, dated February 16, 2023.

Exhibit 8 is a true and correct copy of excerpts from the deposition transcript of Dr. Maxwell Palmer, *see* ECF No. 168, dated February 22, 2023.

Exhibit 9 is a true and correct copy of excerpts from the deposition transcript of John B. Morgan, *see* ECF No. 177, dated February 13, 2023.

Exhibit 10 is a true and correct copy of excerpts from the deposition transcript of Dr. John R. Alford, *see* ECF No. 181-1, dated February 23, 2023.

Dated: April 19, 2023

Respectfully submitted,

By: **Jonathan P. Hawley**

Jonathan P. Hawley*

ELIAS LAW GROUP LLP

1700 Seventh Avenue,

Suite 2100

Seattle, Washington 98101

Phone: (206) 656-0179

Facsimile: (206) 656-0180

Email: JHawley@elias.law

Counsel for Plaintiffs

*Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused to be electronically filed a copy of the foregoing *Declaration of Jonathan P. Hawley in Opposition to Defendants' Motion for Summary Judgment* with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to counsel of record.

Dated: April 19, 2023

Adam M. Sparks

Adam M. Sparks

Georgia Bar No. 341578

KREVOLIN & HORST, LLC

One Atlantic Center

1201 West Peachtree Street, NW,

Suite 3250

Atlanta, Georgia 30309

Telephone: (404) 888-9700

Facsimile: (404) 888-9577

Email: Sparks@khlawfirm.com

Counsel for Plaintiffs

EXHIBIT 1

Expert Report of Blakeman B. Esselstyn

I. INTRODUCTION

A. Qualifications

1. My name is Blakeman B. Esselstyn. I am the founder and principal of a consultancy called Mapfigure Consulting, which provides expert services in the areas of redistricting, demographics, and geographic information systems (GIS). For more specific information about the qualifications and credentials in the paragraphs below, please see my Curriculum Vitae, provided as **Attachment A**.

2. On February 8th and 9th of 2022, in the preliminary injunction proceedings related to this matter, I served as a testifying expert. I was accepted by the Court as an expert in redistricting, demographics, and census data, and my expert testimony was credited by the Court.

3. I have previously served as a consulting expert in four other redistricting cases, and as a testifying expert in three cases related to other topics.

4. I have developed 16 redistricting plans that have been enacted for use in elections by jurisdictions at various levels of government.

5. I earned a bachelor's degree in Geology & Geophysics and International Studies from Yale University and a master's degree in Computer and Information Technology from the University of Pennsylvania. I have professional certifications both as a Geographic Information Systems Professional (GISP) and as a member of the American Institute of Certified Planners (AICP).

6. I have taught graduate-level semester courses in Geographic Information Systems (GIS) and have presented on redistricting at conferences at Harvard University, Duke University, the University of North Carolina at Chapel Hill, the University of Texas, and several other universities. I have also presented at national events organized by the National Conference of State Legislatures (NCSL), the Urban and Regional Information Systems Association (URISA), and the American Planning Association (APA).

7. In addition to speaking engagements, my work and opinions related to redistricting have often been cited in media outlets, and some of my related writings have been published or cited in national publications. Again, for details, please see **Attachment A**.

8. I am being compensated at a rate of \$325 per hour. No part of my compensation is dependent upon the conclusions that I reach or the opinions that I offer.

B. About this report

9. Plaintiffs' counsel has asked me to determine whether there are areas in the State of Georgia where the Black population is "sufficiently large and geographically compact"¹ to enable the creation of additional majority-Black legislative districts relative to the number of such districts provided in the enacted State Senate and State House of Representatives redistricting plans from 2021.

¹ *Thornburg v. Gingles*, 478 U.S. 30, 50 (1986).

10. The Georgia General Assembly has two chambers, each with distinct redistricting plans that I will consider individually. Following a demographic overview of the state that will be relevant for both chambers, the report will provide separate sections addressing each chamber's districts: first the State Senate, then the House of Representatives. For each chamber, I will briefly review the enacted plan, present an alternative illustrative plan, and supply some analysis of selected characteristics of the plans.

11. Unless otherwise specified, all map images in the report are ones that I created (though they may be maps showing redistricting plans I did not create).²

12. More detailed information about the sources of data, the software, and my methodology can be found in **Attachment B**.

C. Summary of conclusions

13. It is possible to create three additional majority-Black districts in the State Senate plan and five additional majority-Black districts in the State House plan in accordance with traditional redistricting principles.

² Some maps deliberately do not show the State of Georgia in its entirety, as districts in large areas of the northern and southern parts of the state are unchanged in the illustrative plans. Focusing in on affected portions of the State's geography allows for more clarity and higher level of detail in the map figures.

II. Statewide Demographic Overview

A. Georgia and the 2020 Census

14. Georgia’s population increased by more than one million people between the 2010 and 2020 censuses, from 9,687,653 to 10,711,908—an increase of approximately 10.6%.³

15. According to the 2020 census, 33.0% of Georgia’s population (essentially one-third) identified as “Black or African American alone or in combination.”⁴ The 2010–2020 population increase in this group outpaced the growth in the state as a whole, increasing by approximately 15.8%.

16. By contrast, the state’s population identifying as White and neither Hispanic nor multi-racial *decreased* by 1.0% between 2010 and 2020. This non-Hispanic White population still constitutes a majority of the state population, but only barely, at 50.1%. In 2010, this group constituted 55.9% of Georgia’s population.

17. The *voting age* population identifying as Black increased 21.8% from 2010 to 2020. In 2020 this group (sometimes abbreviated as BVAP for the Black voting age population) made up 31.7% of the voting age population, an increase from 29.7% in

³ All demographic analysis is based on statistics obtained from the U.S. Census Bureau website, <https://www.census.gov>. For URLs of specific census resources used, please consult Attachment B.

⁴ The Census Bureau classification “Black or African American alone or in combination,” sometimes stated as “any part Black,” will be the measure of the Black population that I use most frequently in this report. Unless otherwise stated, in the text that follows, “Black” can be taken to indicate “alone or in combination.” This measure includes Black residents who also identify as Hispanic. It is my understanding that the “alone or in combination” designation is the appropriate measure for most Voting Rights Act Section 2 considerations.

2010. The non-Hispanic single-race White proportion of the voting age population, however, decreased from 59.0% in 2010 to 52.8% in 2020.

B. Geographic distribution of the Black population

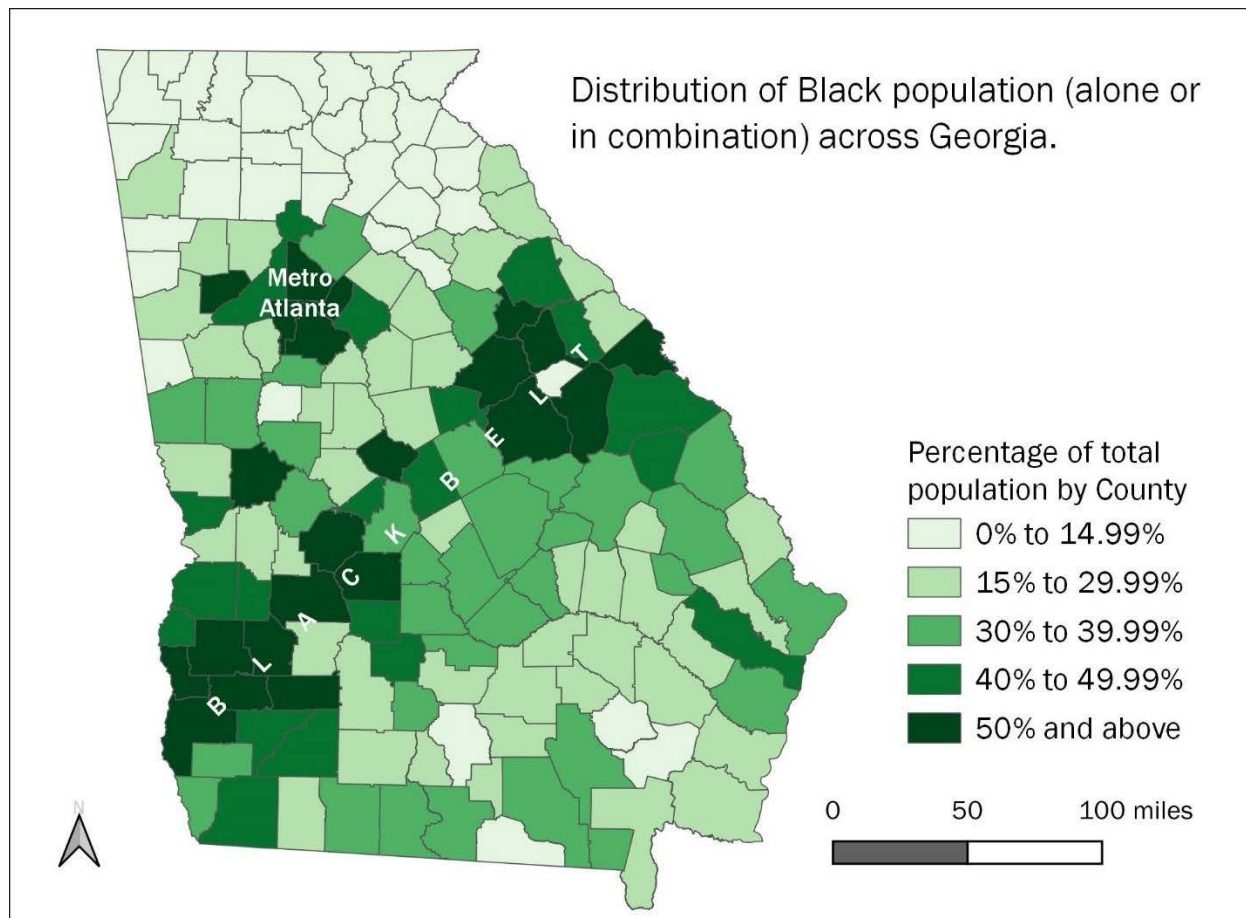
18. Just about half of Georgia's Black population lives in six of the state's 159 counties, all of which are in the Metro Atlanta region. These six counties are, in order of decreasing Black population, Fulton, DeKalb, Gwinnett, Cobb, Clayton, and Henry.

19. The counties in Georgia where the percentage of Black residents generally tends to be highest can be grouped into two main categories: the aforementioned Metro Atlanta region and the so-called "Black Belt" of Georgia. Though some accounts say the origin of the term "Black Belt" in the American South stems from descriptions of the soil, modern classifications of which counties are in this region can hinge on the percentage of the population that is Black.⁵ In Georgia, this belt of counties, most of which are rural, constitutes a wide band from the southwest corner of the state to the central part of the South Carolina border near Augusta-Richmond County. See Figure 1.

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⁵ See, e.g., *Southeastern Geographer* article at <https://www.jstor.org/stable/26225503>.

Figure 1: Statewide map showing percentages of Black population across counties.



20. For a table showing demographic statistics from the 2020 census for Georgia's counties, please see **Attachment C**.

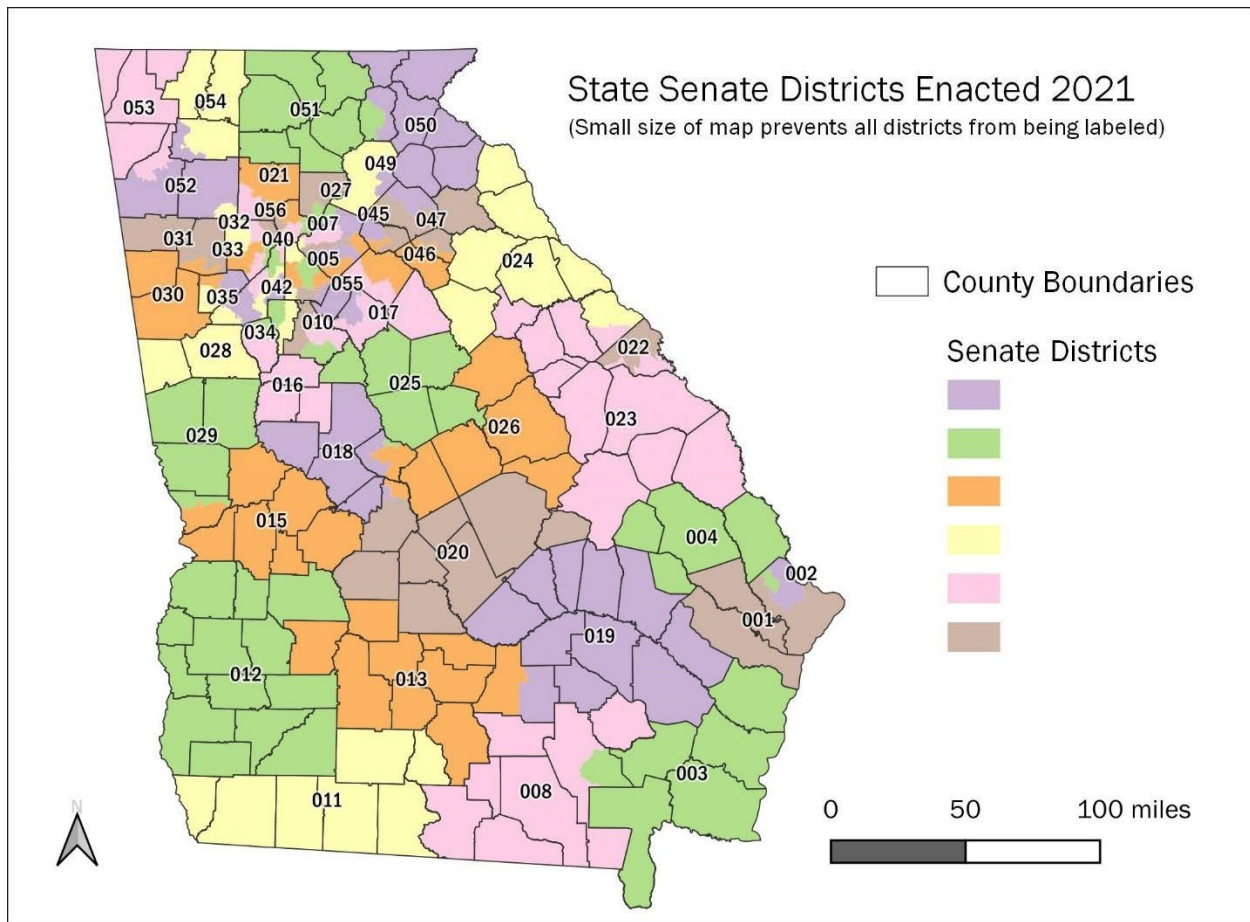
III. Georgia State Senate redistricting plan

A. Review of enacted State Senate plan

21. On December 30th, 2021, Georgia Governor Brian Kemp signed new State Senate districts into law. With districts for 56 senators in this enacted plan, each district

is designed to have a population near 191,284, or one-fifty-sixth of Georgia's total population. See Figure 2.

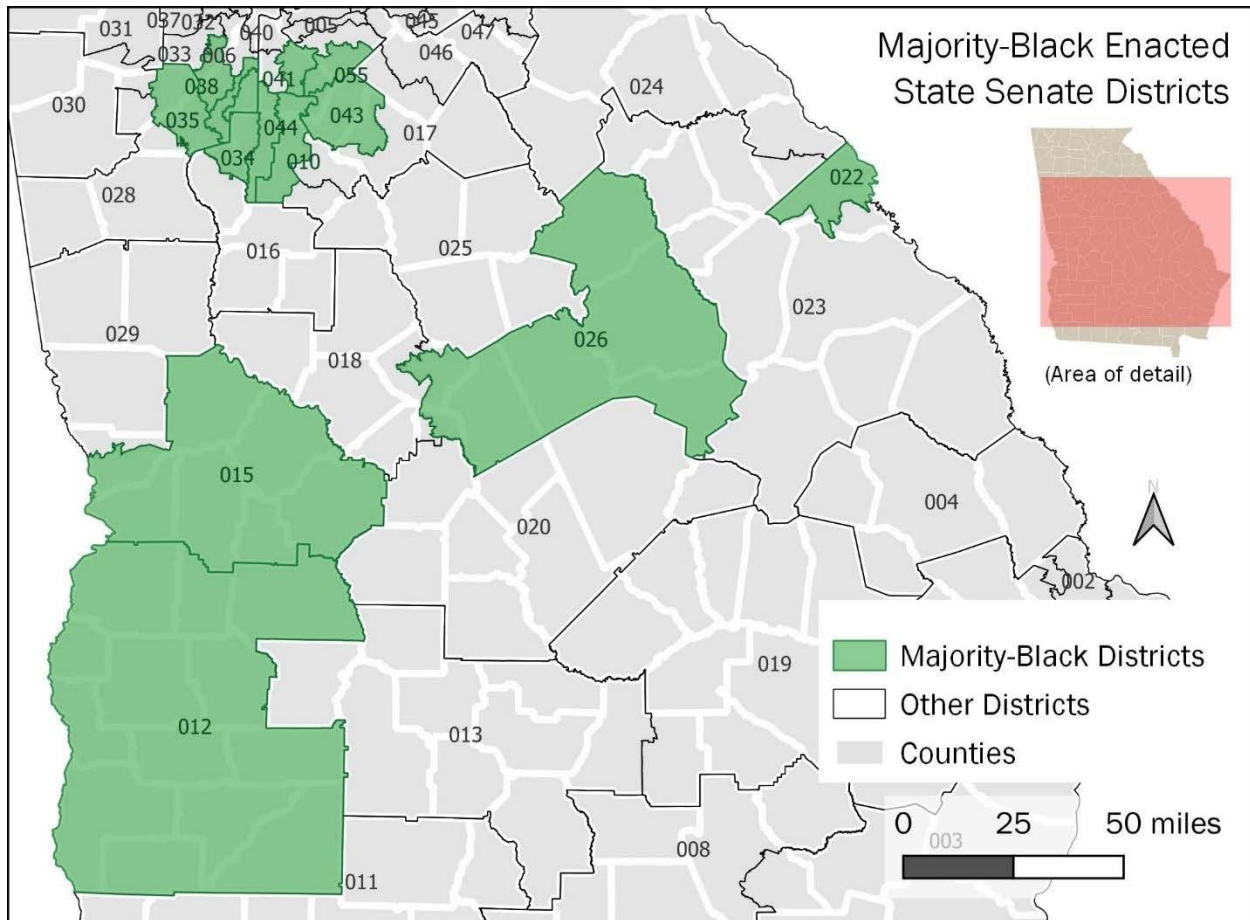
Figure 2: Map of all districts in enacted State Senate plan.



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22. Of the 56 districts in the enacted plan, 14 are majority-Black.⁶ Ten of those are in the Metro Atlanta area and four are in the Black Belt. These districts are highlighted in Figure 3 below.

Figure 3: Map indicating majority-Black districts in enacted State Senate plan.



23. For more maps and statistics related to the enacted State Senate districts, please see **Attachment D**.

⁶ Per convention in Section 2 cases, “majority-Black” is taken to indicate that the district’s *voting age* population that identifies as Black (alone or in combination) constitutes more than 50% of the district’s voting age population.

B. Illustrative State Senate plan

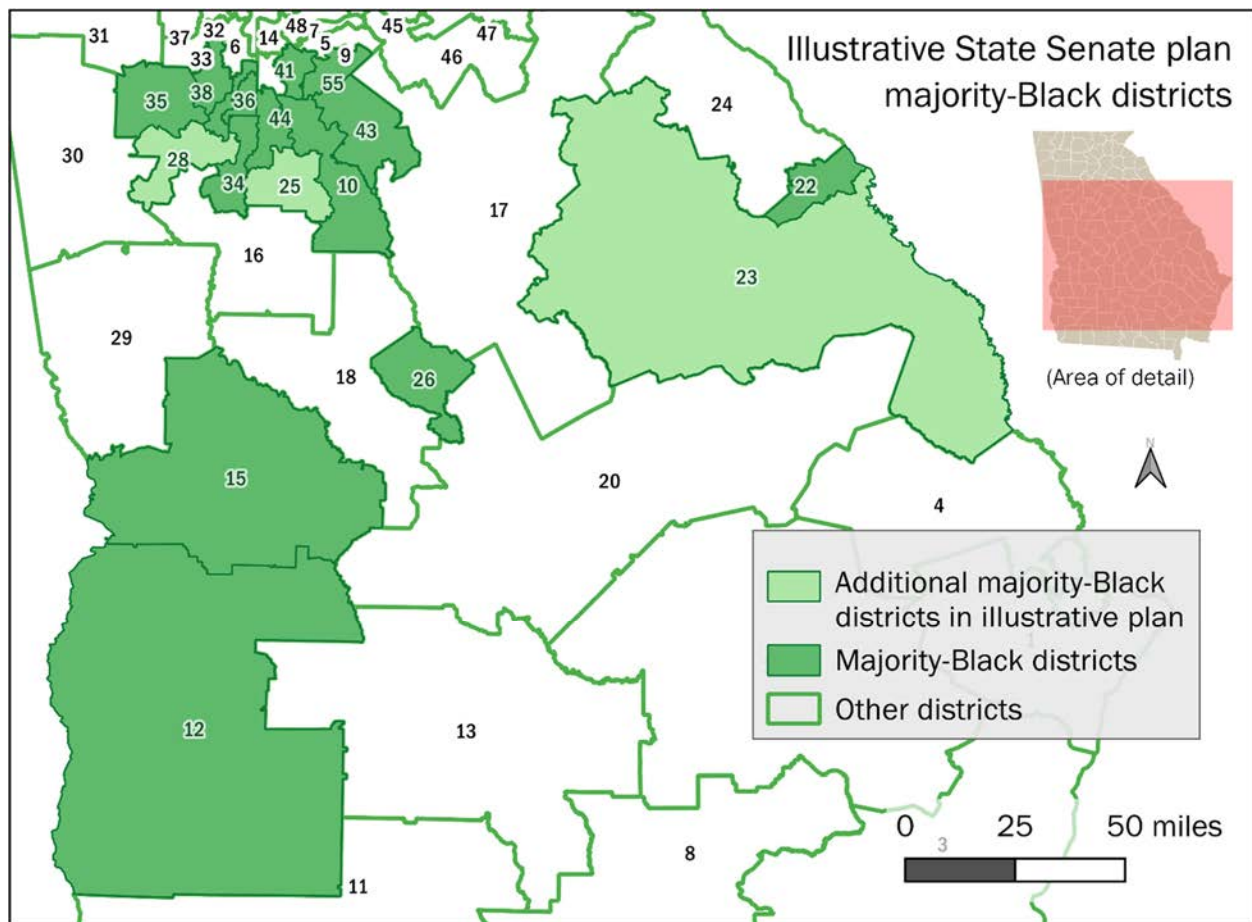
24. The illustrative State Senate plan, like the enacted plan, has 56 districts, all designed to have populations near 191,284.

25. The illustrative plans for the State Senate and House discussed in this report have both been modified slightly from the versions provided as part of the PI proceedings. With the availability of additional data (e.g., incumbent addresses) and information gleaned during the PI proceedings, I sought to improve the plans' performance on multiple criteria. During both the earlier process of creating the PI illustrative plans and the process of revising those plans to create the plans described in this report, I was constantly balancing a number of considerations, and there was no one dominant factor or metric. More details about differences between the newer versions of the illustrative plans and the PI versions are provided in the "Comparative characteristics" sections below.

26. One of the guiding principles in the creation of both the State Senate and House illustrative plans was to minimize changes to the enacted plan while adhering to other neutral criteria. Modifying one district necessarily requires changes to districts adjacent to the original modification, and harmonizing those changes with traditional redistricting criteria (such as population equality and intactness of counties) often inescapably results in cascading changes to other surrounding districts. Notably, most of the enacted plans' districts remain intact in my illustrative plans. In the illustrative State Senate plan, just 22 of the districts were modified, leaving the other 34 unchanged.

27. The illustrative plan includes three additional majority-Black State Senate districts compared to the enacted plan, for a total of 17. Specifically, Senate Districts 23, 25, and 28 are not majority-Black in the enacted plan but are majority-Black in the illustrative plan. See Figure 4 and Table 1.

Figure 4: Map of majority-Black districts in the illustrative State Senate plan.



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Table 1: Illustrative Senate plan majority-Black districts with BVAP percentages.

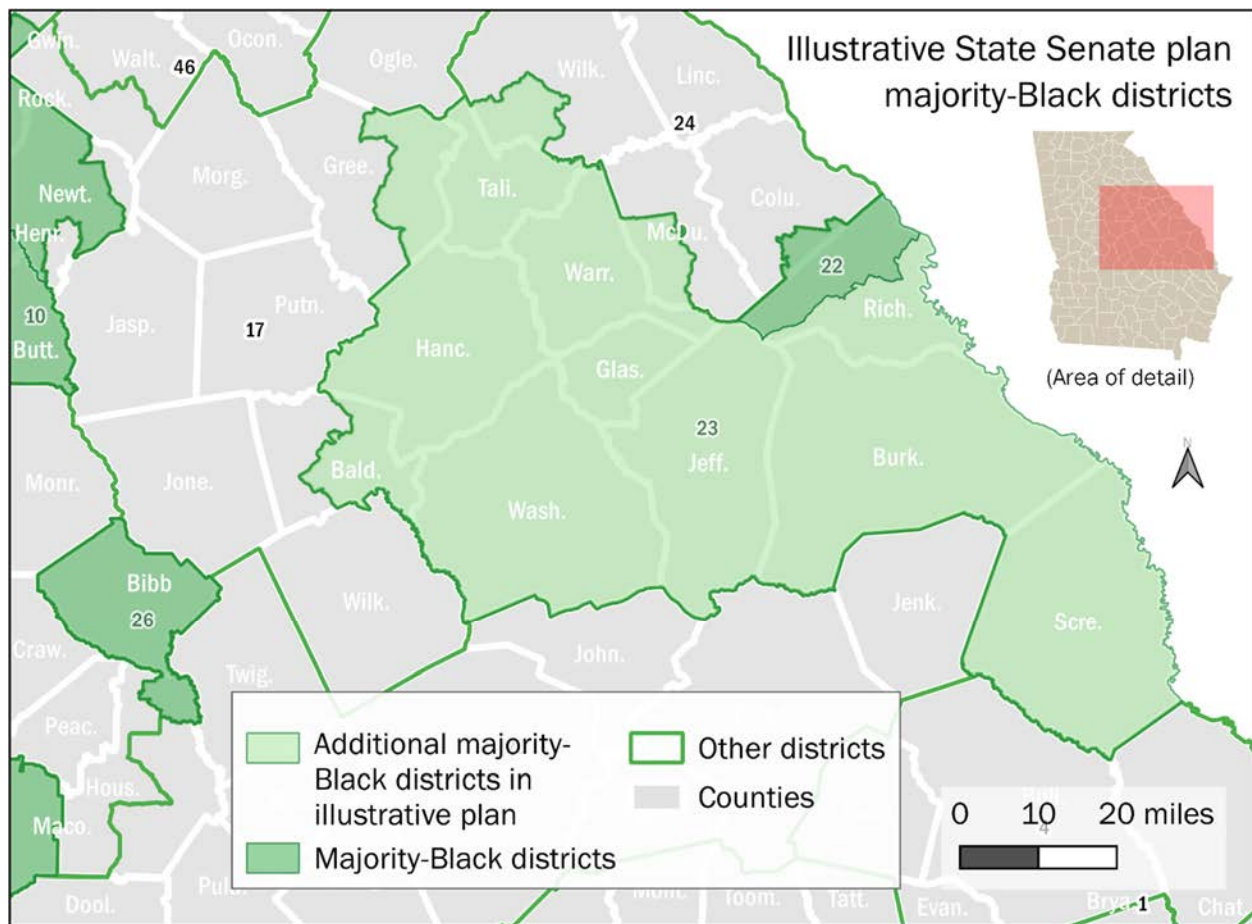
District	BVAP%	District	BVAP%	District	BVAP%
10	61.10%	26	52.84%	39	60.21%
12	57.97%	28	57.28%	41	62.61%
15	54.00%	34	58.97%	43	58.52%
22	50.84%	35	54.05%	44	71.52%
23	51.06%	36	51.34%	55	65.97%
25	58.93%	38	66.36%		

28. The enacted plans have fewer majority-Black districts than the illustrative plans because, in part, more Black voters were heavily concentrated into certain Metro Atlanta districts in the enacted plans.

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29. The additional majority-Black State Senate district in the eastern Black Belt area (District 23) includes all of Burke, Glascock, Hancock, Jefferson, Screven, Taliaferro, Warren, and Washington Counties and parts of Baldwin, Greene, McDuffie, Augusta-Richmond, and Wilkes Counties. See Figure 5.⁷

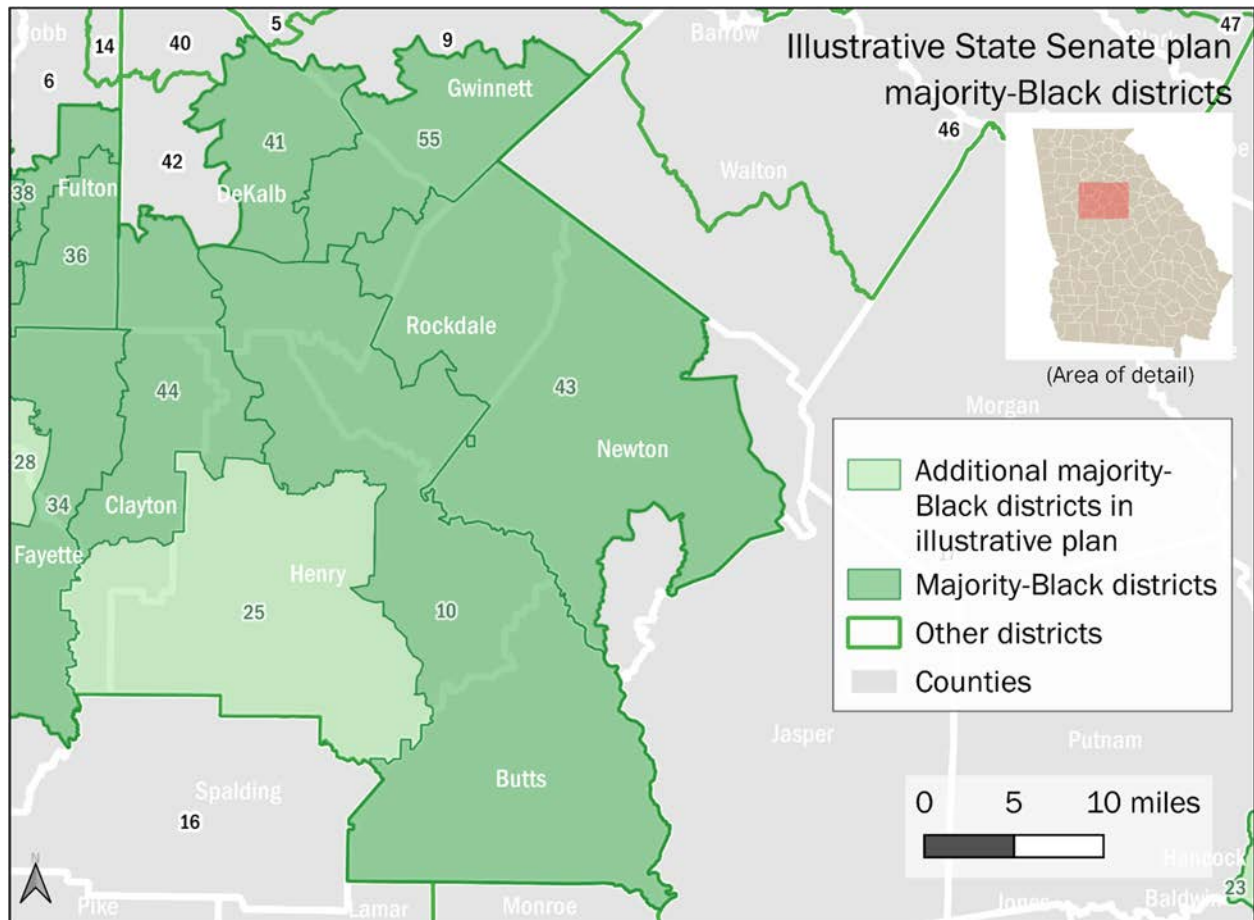
Figure 5: Map of eastern Black Belt region of illustrative plan with majority-Black State Senate districts indicated.



⁷ Additionally, in the illustrative plan, Macon-Bibb County is no longer divided; the majority-Black District 26 includes all of Macon-Bibb County in a single district (as well as a part of Houston County). The intactness of Macon-Bibb County is in keeping with recommendations made during public comment at the hearing held in Macon, Georgia on July 29th, 2021. Two witnesses at the hearing—including Cathy Cox, the former Georgia Secretary of State and then Dean of Mercer University School of Law—spoke about Macon-Bibb County as a community that should be considered as a unit and kept whole. See <https://www.youtube.com/watch?v=lykQpSFVerY> (video at 1:36:52 and 1:37:46). Written statements submitted online also supported keeping Macon-Bibb County intact. See, e.g., comments of S. Doonan (July 26th, 2021), C. Hargrove (July 30th, 2021), and A. Bailey (December 1st, 2021) at <https://www.legis.ga.gov/joint-office/reapportionment/public-comments>.

30. The additional majority-Black State Senate district in the southeastern Metro Atlanta area (District 25) is composed of portions of Clayton and Henry Counties. See Figure 6.

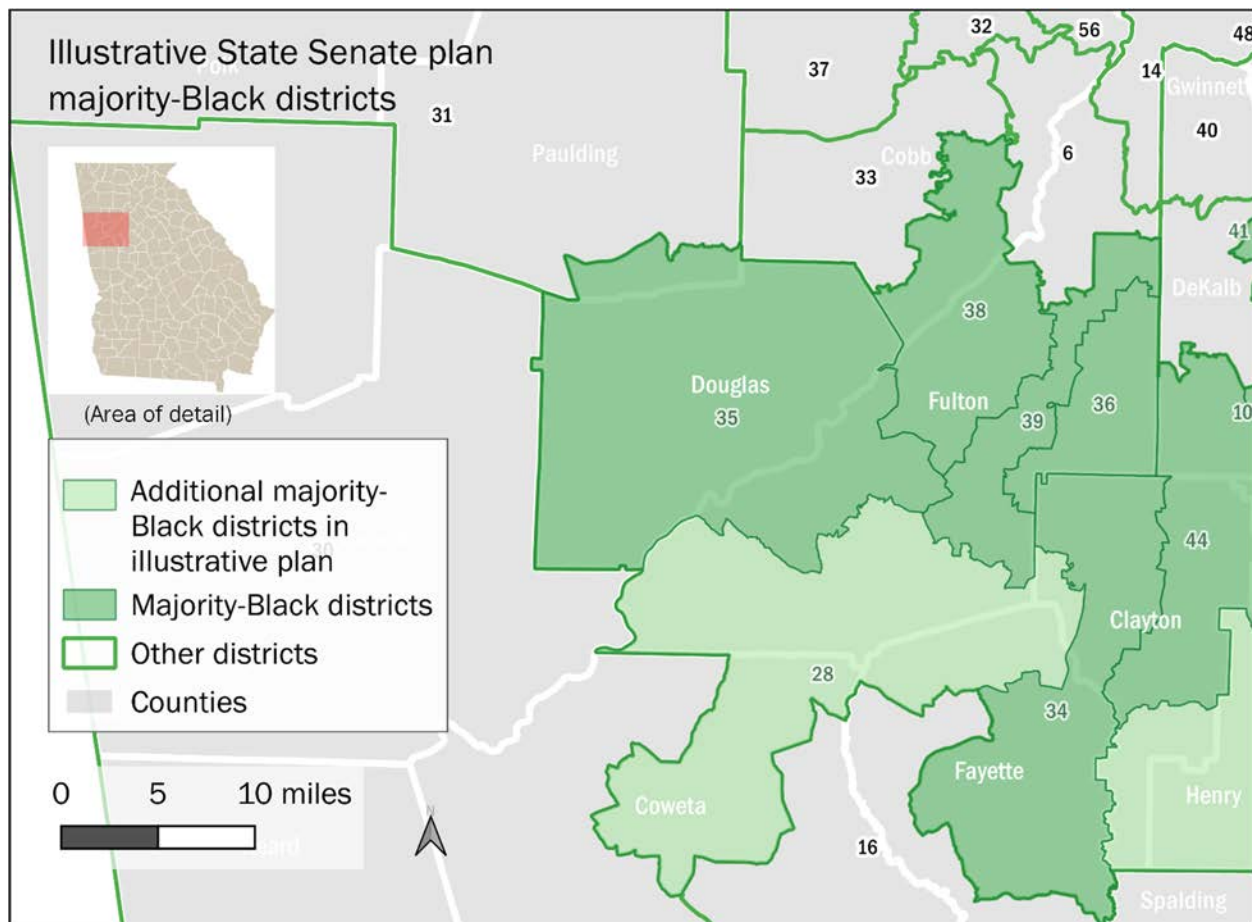
Figure 6: Map of eastern Metro Atlanta area of illustrative plan with majority-Black State Senate districts indicated.



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31. The additional majority-Black State Senate district in the southwestern Metro Atlanta area (District 28) is composed of portions of Clayton, Coweta, Fayette, and Fulton Counties. See Figure 7.⁸

Figure 7: Map of western Metro Atlanta area of illustrative plan with majority-Black State Senate districts indicated.



32. For more demographic statistics related to the illustrative State Senate districts, please see **Attachment E**.

⁸ Incidentally, the illustrative map also includes all of Douglas County in one majority-Black State Senate district, rather than dividing it between two districts as it is in the enacted plan.

C. Comparative characteristics

33. In undertaking the creation of a new redistricting plan for the State Senate, the Senate Reapportionment Committee adopted the “2021-2022 Senate Reapportionment Committee Guidelines,” a full copy of which is appended to this report as **Attachment F**. Within this document is a section called “GENERAL PRINCIPLES FOR DRAFTING PLANS,” which contains a list of principles. The illustrative plan was drawn to comply with and balance these principles.

34. The guidelines provide that “[e]ach legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.” Noting that adherence to other principles can be in tension with population equality, both the enacted plan and the illustrative plan get substantially closer to population equality than the permissible threshold of $\pm 5\%$. In both plans, most district populations are within $\pm 1\%$ of the ideal, and a small minority are within between ± 1 and 2% . None has a deviation of more than 2% . For the enacted plan, the relative average deviation is 0.53% , and for the illustrative plan the relative average deviation is 0.67% .

35. The guidelines additionally provide that “[d]istricts shall be composed of contiguous geography.” The illustrative plan districts meet this contiguity requirement in the same manner as the enacted plan.

36. The guidelines further provide that “[c]ompactness” “should [be] consider[ed].” Numerous measures exist for quantifying compactness of districts, and a selection of some of the most commonly used measures in redistricting are shown in

Table 2 below—both for the enacted plan and the illustrative plan. One can see that the average compactness measures for the plans are almost identical. An explanation of the five compactness metrics is provided as **Attachment G**.⁹

Table 2: Compactness measures for enacted and illustrative State Senate plans.

	Reock (average)	Schwartzberg (average)	Polsby- Popper (average)	Area/Convex Hull (average)	Number of Cut Edges
Enacted	0.42	1.75	0.29	0.76	11,005
Illustrative	0.41	1.76	0.28	0.75	11,003

37. Figure 8 below shows how the three additional majority-Black districts in the illustrative State Senate plan all fall within the range of compactness scores of districts in the enacted plan. The gray lines represent the compactness scores of each of the enacted districts, in sorted order. The purple, orange, and green lines represent the scores of illustrative Districts 23, 25, and 28, respectively. The heights of the lines represent the score (marked on the axis on the left), and the location of the line indicates the position within the sorted order between maximum compactness (left side) and minimum compactness (right side). For all four measures, the scores of the three additional majority-Black districts in the illustrative plan are comparable to those of enacted districts and indicate greater compactness than the least compact districts in the enacted plan. See Table 3 for the specific related numeric scores.

⁹ A simplified summary of how to interpret the measures follows: the Reock, Polsby-Popper, and Area/Convex Hull measures all provide scores between zero and one, with scores closer to one (i.e., *higher* values) indicating more compactness; the Schwartzberg measure provides scores greater than or equal to one, and scores closer to one (i.e., *lower* values) indicate more compactness; and for the Number of Cut Edges, which is only meaningful for comparing entire plans—not individual districts—a lower score indicates more compactness.

Figure 8: Sorted compactness measures for all enacted plan districts and additional majority-Black districts in the illustrative State Senate plan.

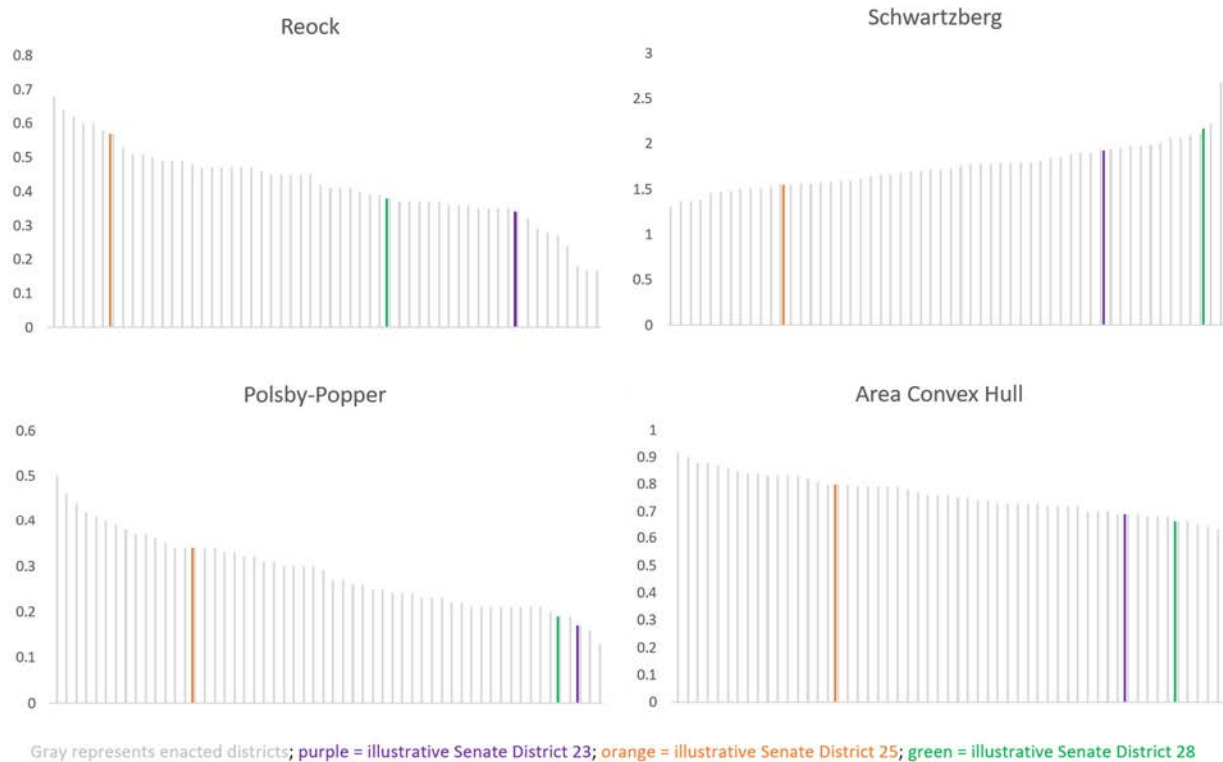


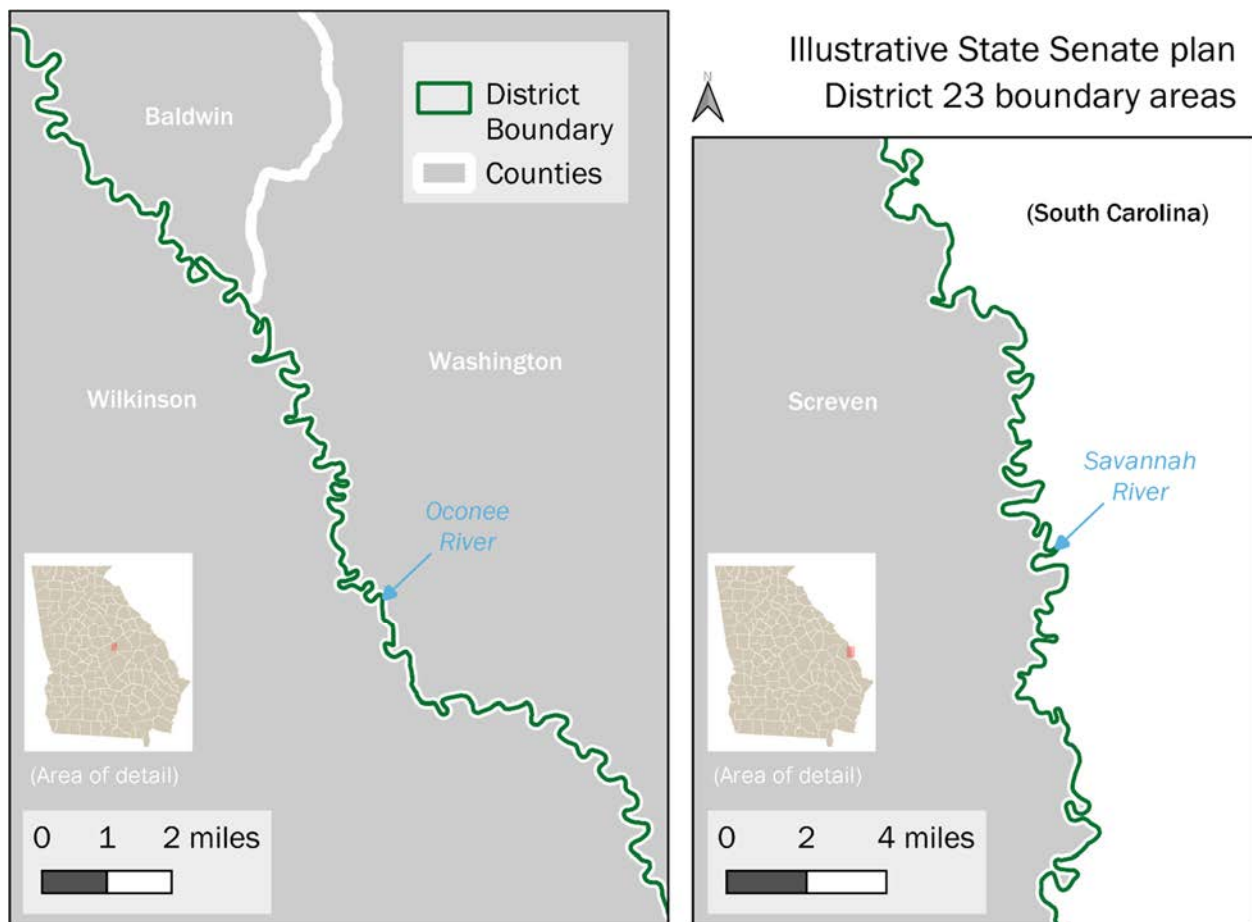
Table 3: Summary compactness scores for enacted State Senate districts and compactness scores for illustrative State Senate districts.

	Measures of Compactness			
	Reock	Schwartzberg	Polsby-Popper	Area/ Convex Hull
Enacted plan least compact score	0.17	2.67	0.13	0.50
Enacted plan median score	0.415	1.725	0.28	0.755
Illustrative District 23 score	0.34	1.93	0.17	0.69
Illustrative District 25 score	0.57	1.55	0.34	0.80
Illustrative District 28 score	0.38	2.17	0.19	0.66

38. Illustrative State Senate District 23 offers an interesting example of how different compactness measures weight boundary features in different ways. In Figure 8 above, one can see that illustrative State Senate District 23 scores very close to the

“bottom” (i.e., least compact) value in the range for the Polsby-Popper measure, but not for the other three measures. The Polsby-Popper measure, which considers a district’s perimeter in its formula, heavily penalizes a district if it has a wiggly border, even if the district’s overall shape isn’t stringy or convoluted. Figure 9 below shows two sections of illustrative District 23’s outline where it is simply following county boundaries, and those county boundaries happen to be serpentine in shape. As is often the case, the county boundaries follow significant rivers (the Oconee and Savannah), which are widely considered to be intuitive features to use as the division between districts or other administrative areas.

Figure 9: Detail of selected Illustrative State Senate District 23 boundaries.



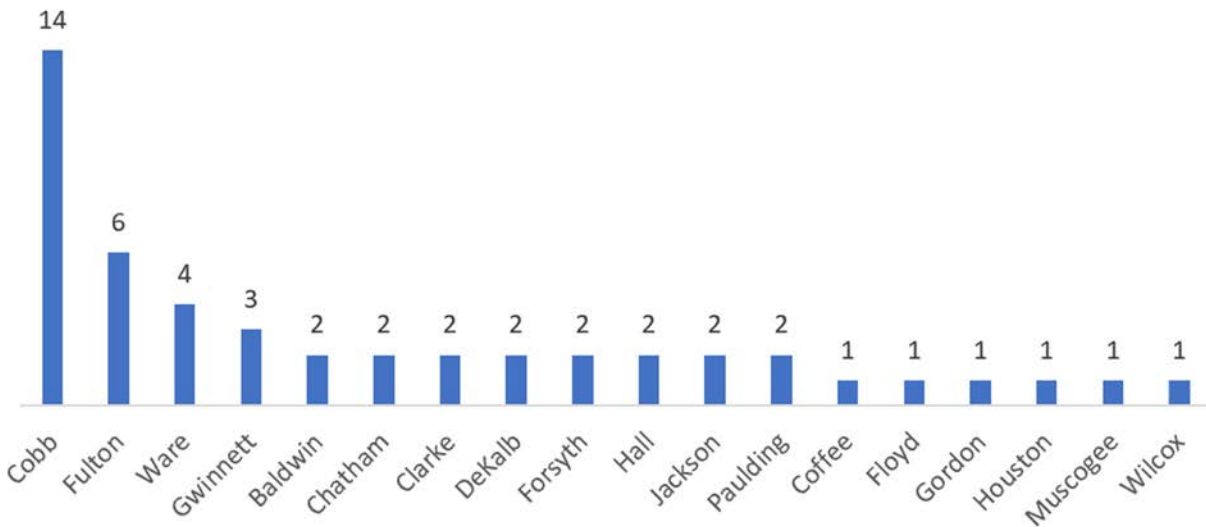
39. The guidelines also provide that “[t]he boundaries of counties and precincts” “should [be] consider[ed].” In redistricting in the United States, consideration of such boundaries is generally taken to mean that counties and precincts should be kept intact to the extent possible (i.e., not split among multiple districts). While the Reapportionment Committee’s language regarding this guideline is not explicit, Table 4: below provides numbers of counties and VTDs (the Census “Voting District” used by redistricting software as a proxy for precincts) split in both the enacted and illustrative State Senate plans.

Table 4: Political subdivision splits for enacted and illustrative State Senate plans.

	Intact Counties	Split Counties	Split VTDs
Enacted	130	29	47
Illustrative	125	34	49

40. While the creation of three additional majority-Black State Senate districts involved the division of additional counties and VTDs, the differences are marginal.¹⁰ Figure 10 below shows which counties those VTD splits are in in the illustrative State Senate plan. All of the VTDs split in the illustrative State Senate plan are confined to just 18 of the State’s 159 counties.

¹⁰ The number of county splits in the State Senate illustrative plan (34) is lower than the number of such splits in the State Senate plan adopted in 2014 (38), which was used in elections from 2014 through 2020. See https://www.legis.ga.gov/api/document/docs/default-source/reapportionment-document-library/senate14-county.pdf?sfvrsn=e8061e5c_2 and https://www.legis.ga.gov/api/document/docs/default-source/reapportionment-document-library/counties-by-house-districts.pdf?sfvrsn=b7c39a42_2.

Figure 10: VTD splits in illustrative State Senate plan by county.

41. The guidelines further call for consideration of “[c]ommunities of interest.” Communities of interest can be larger than a county or smaller than a college campus, and individuals may have different opinions about their exact geographic extents. In identifying such communities, I generally referred to recognizable entities visible in the *Maptitude for Redistricting* software interface, such as municipalities and landmark areas, as well as areas and communities I’ve heard described by Georgians, either in personal conversations or in statements made in public hearings. When making changes to districts for my PI illustrative plan, I did strive to keep communities of interest intact as much as possible while also honoring the other guidelines. In that plan, however, I inadvertently divided the two campuses of Georgia College (they are both in Milledgeville, but about a mile apart). The revised district lines for the illustrative plan submitted with this report not only keep both campuses in the same State Senate district, but they also do a better job of keeping central Milledgeville in a single district.

42. The final specified guideline is that “[e]fforts should be made to avoid the unnecessary pairing of incumbents.” Based on my analysis of the residential addresses of the recently elected State Senators (provided by counsel), the illustrative plan would not pair any incumbent Senators in the same district. The avoidance of any incumbent pairing represents an improvement over the PI illustrative plan, which paired two incumbents according to a declaration from John Morgan provided as part of the PI proceedings.¹¹

43. For more detailed statistics and reports on the above characteristics, please see **Attachment H**.

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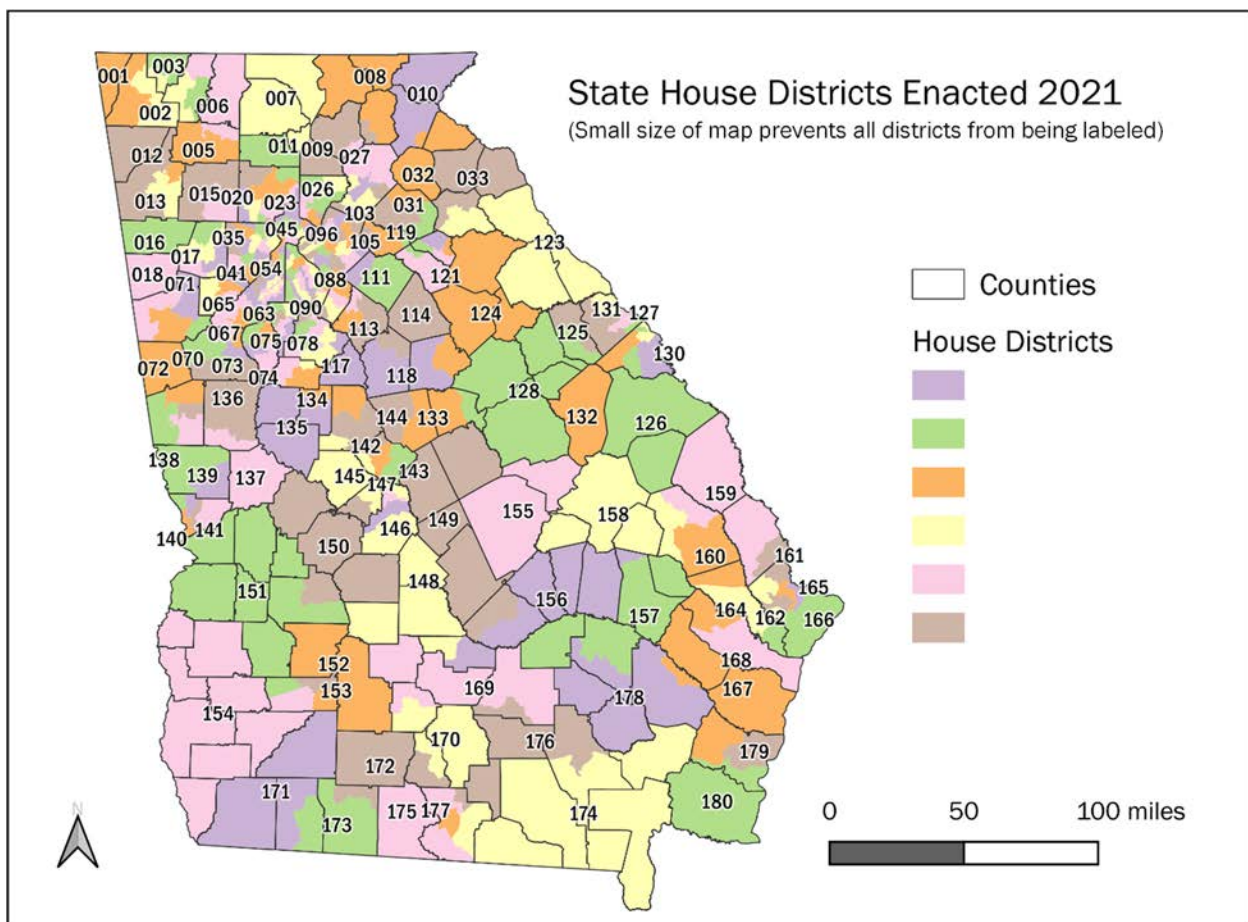
¹¹ See Declaration of John B. Morgan, January 18, 2022, p. 8.

IV. Georgia House redistricting plan

A. Review of enacted House plan

44. On December 30th, 2021, Governor Kemp signed new House of Representatives districts into law. With districts for 180 Representatives in this enacted plan, each district is designed to have a population near 59,511, or one-one-hundred-eightieth of Georgia's total population. See Figure 11.

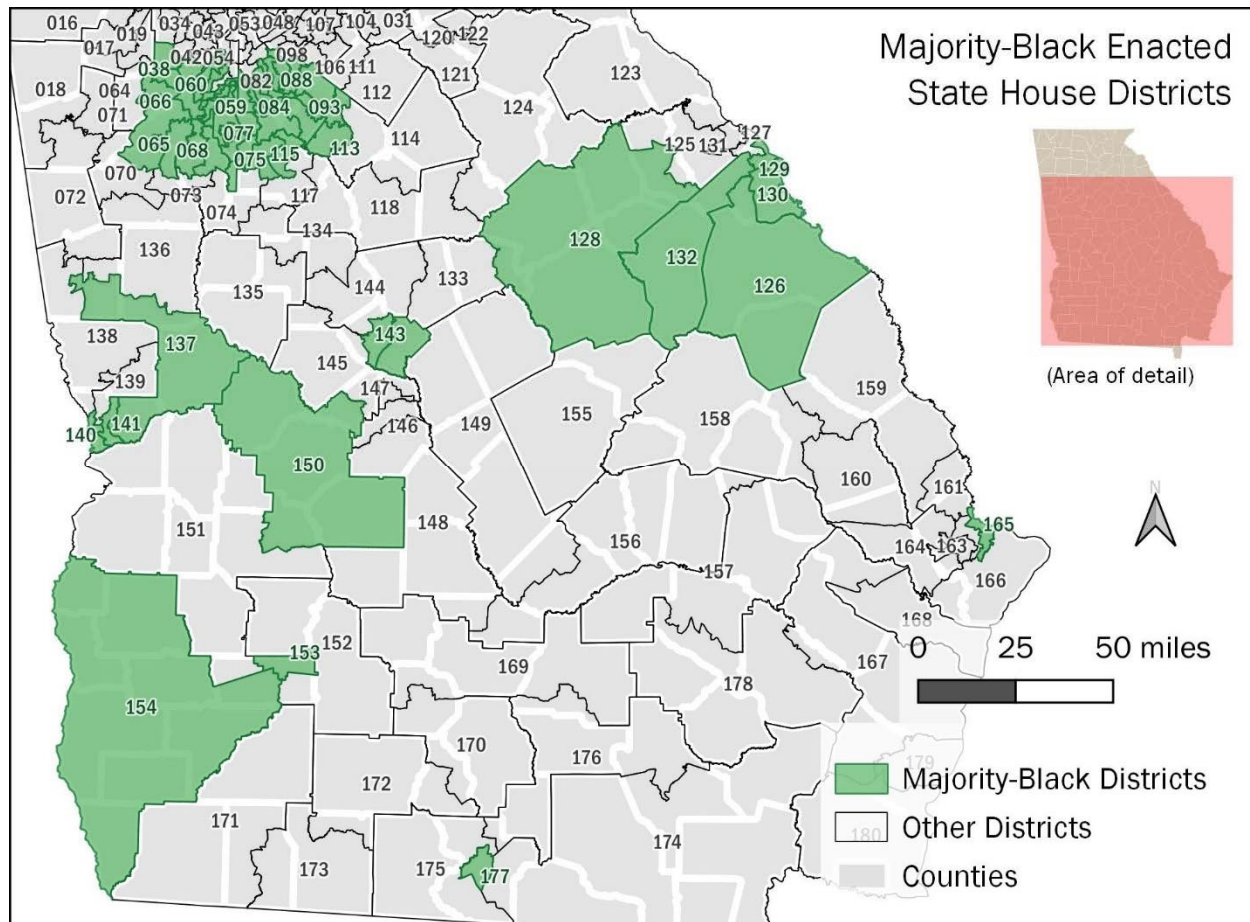
Figure 11: Map of all districts in enacted House plan.



45. Of the 180 districts in the enacted plan, 49 are majority-Black. Thirty-four of those are in the Metro Atlanta area, 13 are in the Black Belt, and two small districts are

within Chatham (anchored in Savannah) and Lowndes Counties (anchored in Valdosta) in the southeastern part of the state. These districts are highlighted in Figure 12 below.

Figure 12: Map indicating majority-Black districts in enacted House plan.



46. For more maps and statistics related to the enacted House districts, please see **Attachment I**.

B. Illustrative House plan

47. The illustrative House plan, like the enacted plan, has 180 districts, all with populations near 59,511. As with the illustrative State Senate plan, one of the guiding principles was to minimize changes to the enacted plan while adhering to the range of

other neutral criteria. In fact, just 25 of the districts were modified, leaving the other 155 unchanged. The PI version of the illustrative plan, by contrast, modified 26 districts.

48. The illustrative plan includes five additional majority-Black House districts compared to the enacted plan, for a total of 54. Specifically, House Districts 64, 74, 117, 145, and 149 are not majority-Black in the enacted plan but are majority-Black in the illustrative plan. See Figure 13 and Table 5.

Figure 13: Map of majority-Black districts in the illustrative House plan.

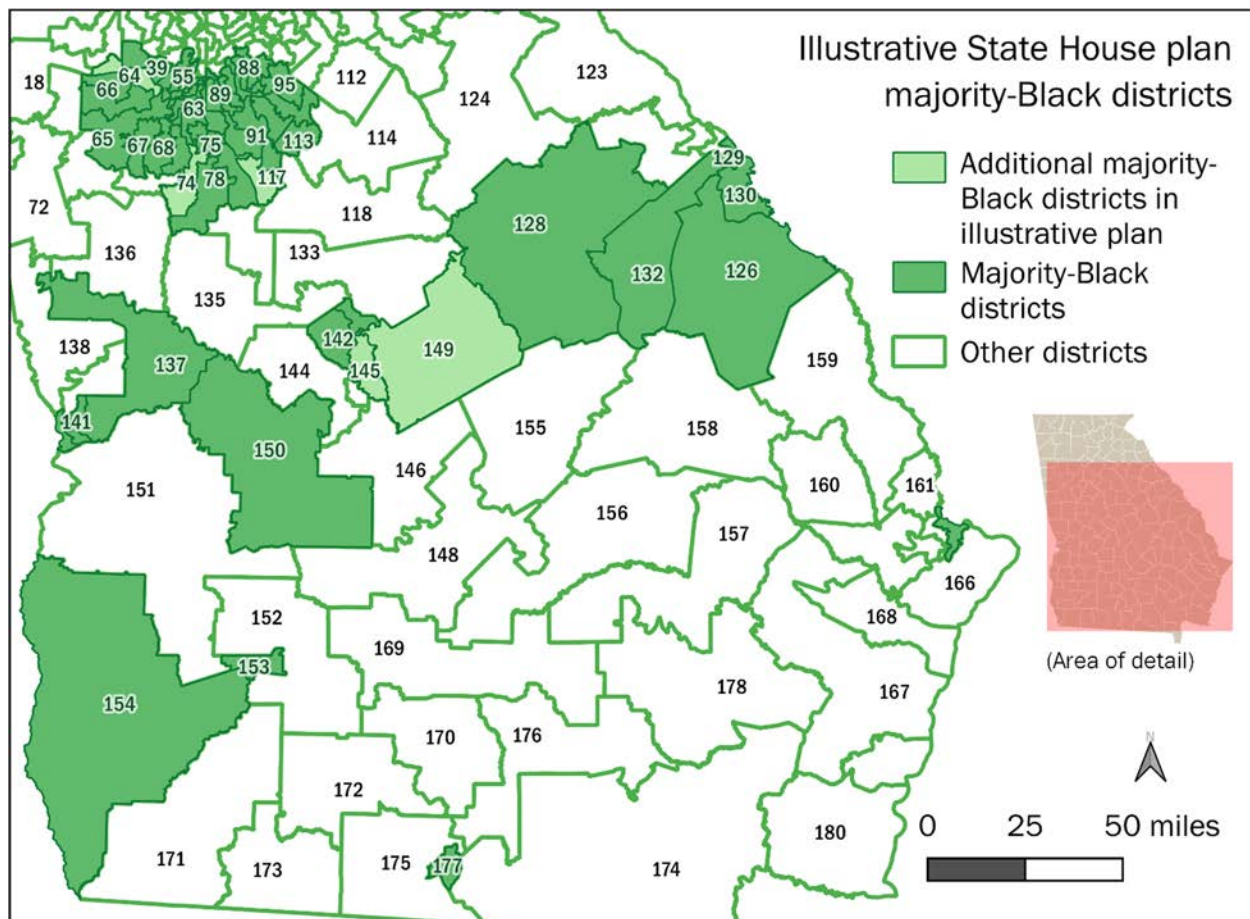


Table 5: Illustrative House plan majority-Black districts with BVAP percentages.

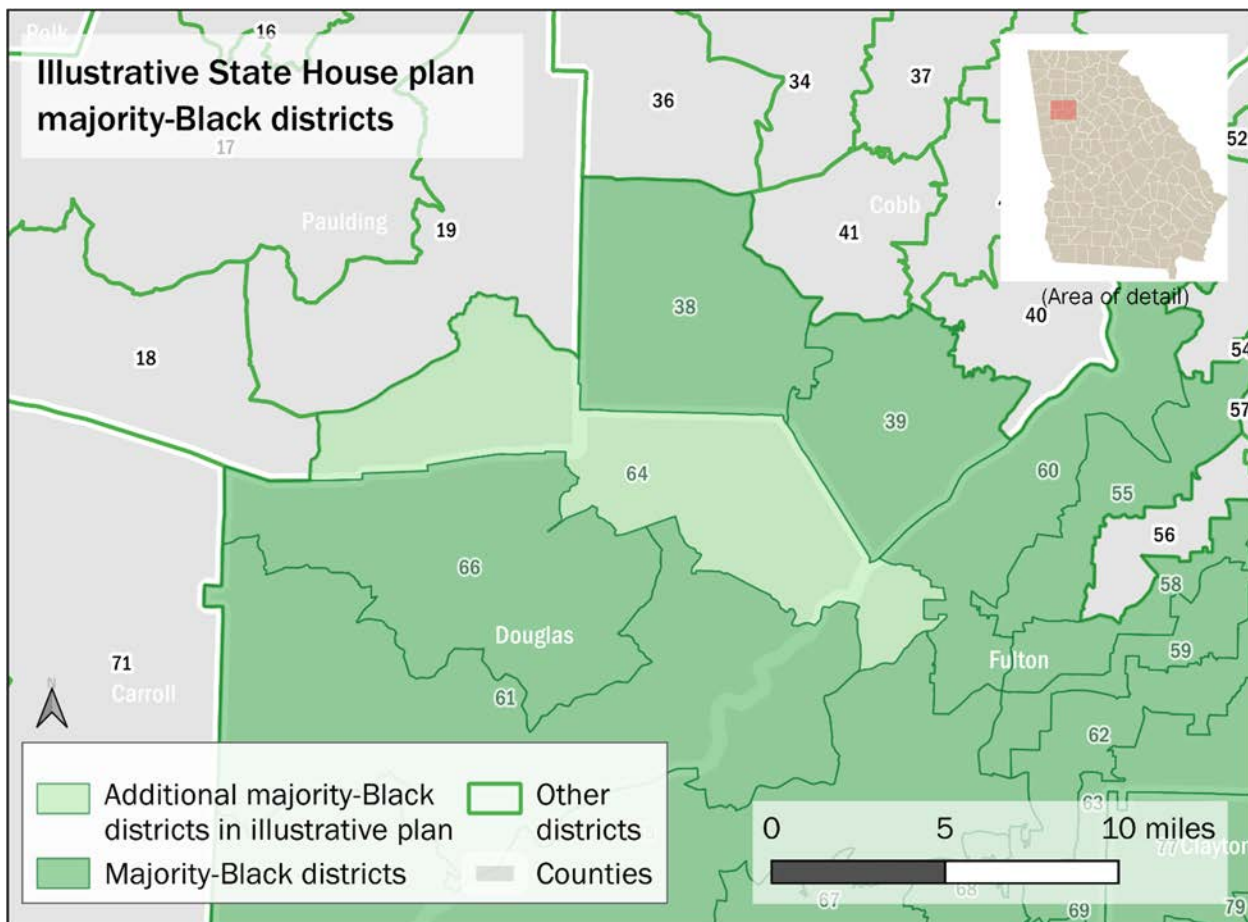
District	BVAP%	District	BVAP%	District	BVAP%	District	BVAP%
38	54.23%	69	62.73%	91	60.01%	137	52.13%
39	55.29%	74	53.94%	92	68.79%	140	57.63%
55	55.38%	75	66.89%	93	65.36%	141	57.46%
58	63.04%	76	67.23%	94	69.04%	142	50.14%
59	70.09%	77	76.13%	95	67.15%	143	50.64%
60	63.88%	78	51.03%	113	59.53%	145	50.38%
61	53.49%	79	71.59%	115	53.77%	149	51.53%
62	72.26%	84	73.66%	116	51.95%	150	53.56%
63	69.33%	85	62.71%	117	51.56%	153	67.95%
64	50.24%	86	75.05%	126	54.47%	154	54.82%
65	63.34%	87	73.08%	128	50.41%	165	50.33%
66	53.88%	88	63.35%	129	54.87%	177	53.88%
67	58.92%	89	62.54%	130	59.91%		
68	55.75%	90	58.49%	132	52.34%		

[Intentionally blank]

49. The additional majority-Black House district in the western Metro Atlanta area (District 64) is composed of portions of Douglas, Fulton, and Paulding Counties.

See Figure 14.

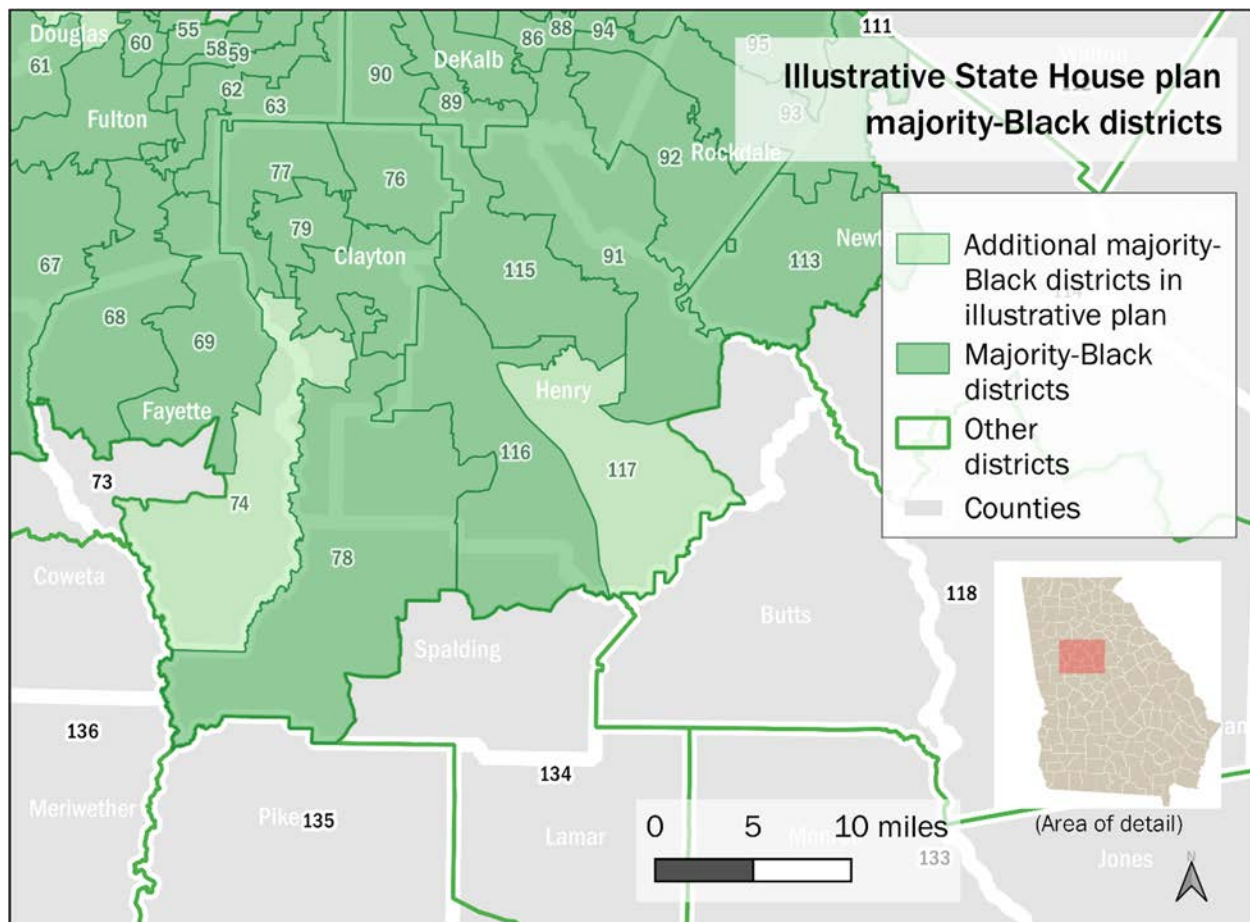
Figure 14: Map of western Metro Atlanta area of illustrative plan with majority-Black House districts indicated.



[Intentionally blank]

50. The additional majority-Black House districts in the southern Metro Atlanta area (Districts 74 and 117) are built from portions of Clayton, Fayette, and Henry Counties. See Figure 15.

Figure 15: Map of southern Metro Atlanta area of illustrative plan with majority-Black House districts indicated.



51. The two additional majority-Black House districts in the central Black Belt area (Districts 145 and 149) are built from portions of Baldwin, Macon-Bibb, and Houston Counties, as well as all of Twiggs and Wilkinson Counties. The adjacent Twiggs and Wilkinson Counties, included in their entirety in District 149, have been identified

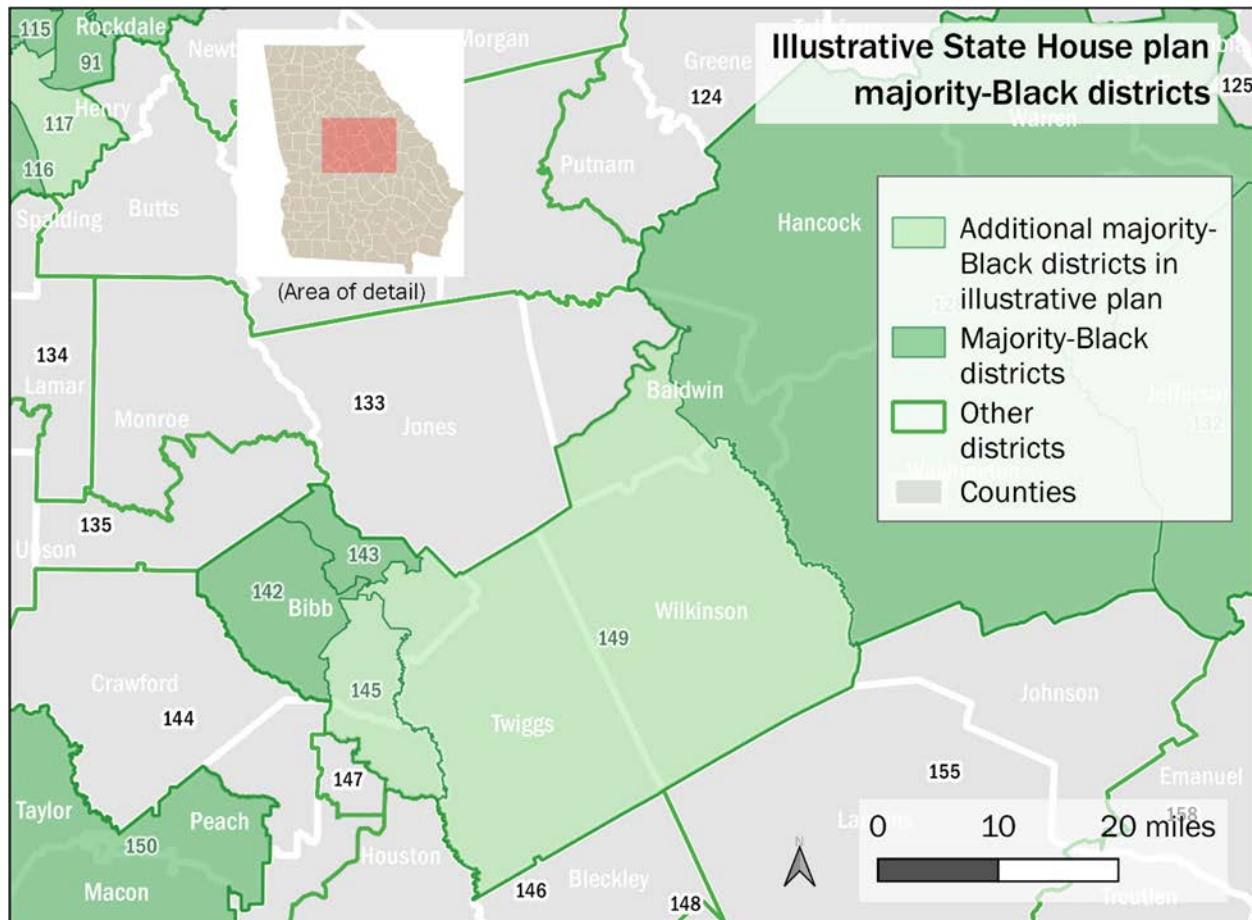
by General Assembly staff as “constitut[ing] a single community of interest.”¹² The illustrative plan, like the enacted plan, divides Macon-Bibb County into four districts, two of which (Districts 142 and 143) are wholly contained in Macon-Bibb County, and two of which (Districts 145 and 149 in the illustrative plan) extend outside the county as well. The orientation of Districts 142 and 143 also ensures that the northern portions of Macon-Bibb County stay in a Macon-Bibb County district with portions of Macon, rather than being put in a district with a more rural neighboring county like Monroe; this type of arrangement was specifically recommended during public comment at a Joint Reapportionment Committee hearing.¹³ See Figure 16.

[Intentionally blank]

¹² Specifically, Gina Wright, Executive Director of the General Assembly's Legislative and Congressional Reapportionment Office, included this statement in her declaration filed before the Court's PI hearing. See Declaration of Gina Wright, February 4th, 2022, p. 9.

¹³ See, e.g., comment at Georgia General Assembly Joint Reapportionment Committee hearing held in Macon, Georgia on July 29th, 2021, <https://www.youtube.com/watch?v=IYkQpSFVerY> (video at 33:42).

Figure 16: Map of central Black Belt region of illustrative plan with majority-Black House districts indicated.



52. District 149 generally follows the orientation of the Georgia Fall Line geological feature, which brings with it shared economic, historic, and ecological similarities.¹⁴ Macon and Milledgeville, parts of which are in illustrative House District 149, are both characterized as “Fall Line Cities,”¹⁵ and were identified in public comment

¹⁴ See, e.g., <https://www.georgiaencyclopedia.org/articles/geography-environment/fall-line/> and <http://southres.com/uptowncolumbusdams/thefallline.php>.

¹⁵ See “Fall Line Cities” map at <https://www.gpb.org/blogs/education-matters/2017/02/06/new-virtual-field-trip-physical-features-of-georgia> and the southres.com article in the preceding footnote.

before the General Assembly's Joint Reapportionment Committee as two cities that should be kept in the same district.¹⁶

53. For more demographic statistics related to the illustrative House districts, please see **Attachment J**.

C. Comparative characteristics

54. In undertaking the creation of a new redistricting plan for the House, the House Reapportionment Committee adopted the "2021-2022 House Reapportionment Committee Guidelines," a full copy of which is appended to this report as **Attachment K**. Within this document is a section called "GENERAL PRINCIPLES FOR DRAFTING PLANS," which contains a list of principles. The illustrative plan was drawn to comply with and balance these principles. As with the Senate Committee's principles discussed above, five of the principles can be quantitatively analyzed to help illustrate adherence.

55. The guidelines provide that "[e]ach legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below." As with the Senate plan, both the enacted plan and the illustrative plan get substantially closer to population equality than the permissible threshold of $\pm 5\%$. In both plans, most district populations are within $\pm 1\%$ of the ideal, and a small minority are within between ± 1 and 2% . None has a deviation of more than 2% . For the enacted plan, the relative average deviation is 0.61% , and for the illustrative plan the relative average deviation is 0.64% .

¹⁶ See, e.g., comment from Georgia General Assembly Joint Reapportionment Committee hearing on June 15th, 2021 at <https://www.youtube.com/watch?v=sewqUNTIUxA> (video at 49:15).

56. The guidelines additionally provide that “[d]istricts shall be composed of contiguous geography.” The illustrative plan districts meet this contiguity requirement in the same manner as the enacted plan.

57. The guidelines further provide that “[c]ompactness” “should [be] consider[ed].” A selection of some of the most commonly used measures of compactness are shown in Table 6 below—both for the enacted plan and the illustrative plan. One can see that the average compactness measures for the plans are almost identical, if not identical.

Table 6: Compactness measures for enacted and illustrative House plans.

	Reock (average)	Schwartzberg (average)	Polsby- Popper (average)	Area/Convex Hull (average)	Number of Cut Edges
Enacted	0.39	1.80	0.28	0.72	22,020
Illustrative	0.39	1.81	0.28	0.72	22,359

58. Figure 17 below shows how the five additional majority-Black districts in the illustrative House plan all fall within the range of compactness scores of districts in the enacted plan. The gray lines represent the compactness scores of each of the enacted districts, in sorted order. The purple, orange, green, pink, and blue lines represent the scores of illustrative House Districts 64, 74, 117, 145, and 149, respectively. The heights of the lines represent the score (marked on the axis on the left), and the location of the line indicates the position within the sorted order between maximum compactness (left side) and minimum compactness (right side). For all four measures, the scores of the five additional majority-Black districts in the illustrative plan are comparable to those of

enacted districts and indicate greater compactness than the least compact district in the enacted plan. See Table 7 for the specific related numeric scores.

Figure 17: Sorted compactness measures for all enacted plan districts and additional majority-Black districts in the illustrative House plan.

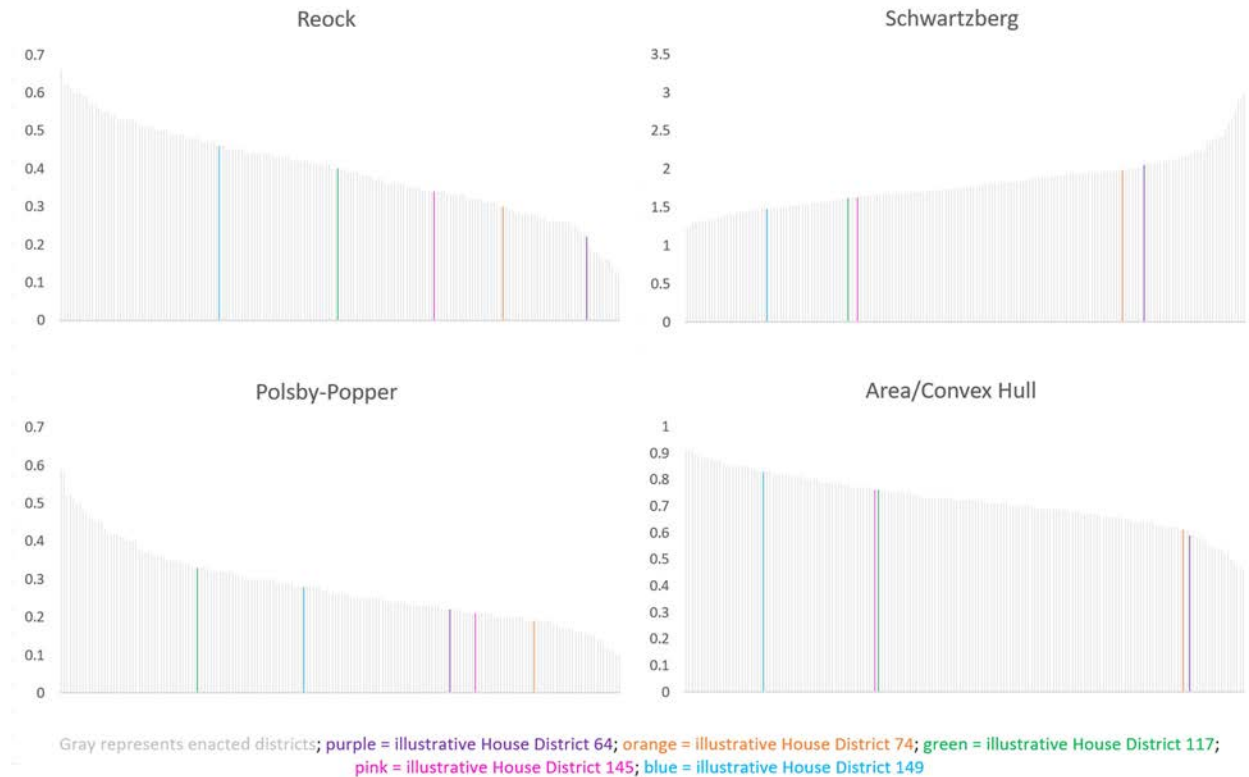


Table 7: Summary compactness scores for enacted House districts and compactness scores for illustrative House districts.

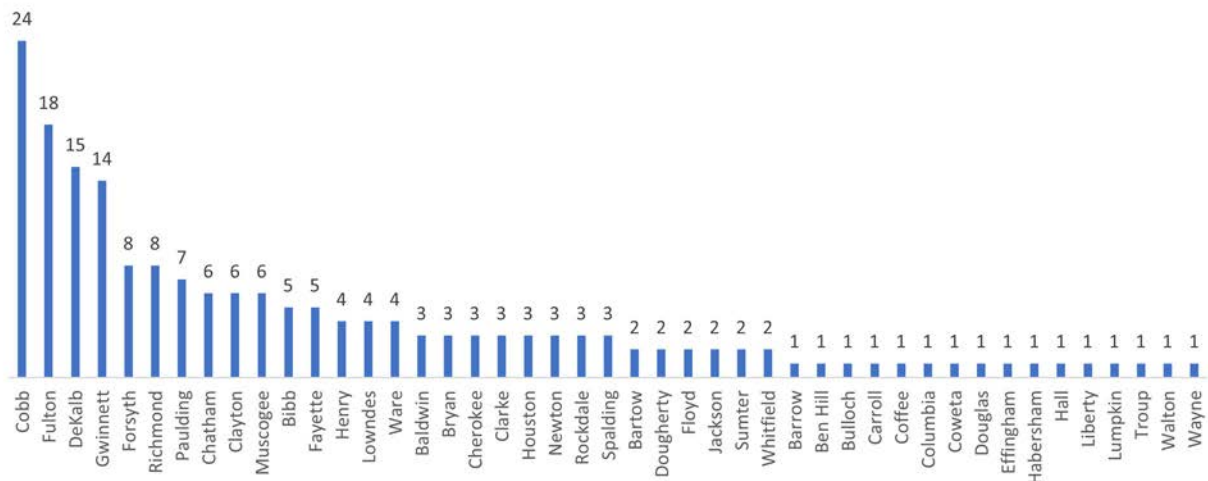
	Measures of Compactness			
	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Enacted plan least compact score	0.12	2.98	0.10	0.46
Enacted plan median score	0.40	1.765	0.26	0.72
Illustrative District 64 score	0.22	2.05	0.22	0.59
Illustrative District 74 score	0.30	1.98	0.19	0.61
Illustrative District 117 score	0.40	1.62	0.33	0.76
Illustrative District 145 score	0.34	1.63	0.21	0.76
Illustrative District 149 score	0.46	1.48	0.28	0.83

59. The guidelines further provide that “[t]he boundaries of counties and precincts” “should [be] consider[ed].” Table 8 below shows that the numbers of counties and VTDs (akin to precincts) split in the enacted and illustrative House plans are nearly equal. This version of the illustrative House plan splits six fewer VTDs than the PI version. Figure 18 below shows which counties those VTD splits are in. Just 45 of the State’s 159 counties account for all of the splits.

Table 8: Political subdivision splits for enacted and illustrative House plans.

	Intact Counties	Split Counties	Split VTDs
Enacted	90	69	185
Illustrative	89	70	186

Figure 18: VTD splits in illustrative State House plan by county.



60. The guidelines next call for consideration of “[c]ommunities of interest.” My approach to preserving the intactness of communities of interest in the illustrative House map was similar to the one described in the State Senate “Comparative characteristics” section above. As with the comparable State Senate illustrative map, I

had inadvertently divided the two campuses of Georgia College in the initial illustrative House plan provided during the PI proceeding. The newer House illustrative plan rectifies that community split, and also keeps the central community of Milledgeville more intact. Additionally, as mentioned in the previous section, the district boundaries keep together communities in the Macon-Bibb County area as well as in the central Black Belt region.

61. The final specified guideline is that “[e]fforts should be made to avoid the unnecessary pairing of incumbents.” Based on analysis of the residential addresses of the recently elected State Representatives (provided by counsel), the illustrative plan would evidently pair a total of eight incumbents in the same districts.¹⁷ This is the same number of incumbent pairings reported for the enacted plan in the declaration from John Morgan, provided as part of the PI proceedings.¹⁸ Further it represents a significant improvement over the PI illustrative plan (created without knowledge of incumbent addresses), which paired 16 incumbents, according to the same declaration.¹⁹

62. For more detailed statistics and reports on the above characteristics, please see **Attachment L**.

V. Conclusion

63. This report has demonstrated that it is possible to create three additional majority-Black districts in the Georgia State Senate plan and five additional majority-

¹⁷ Namely Mike Glanton and Kimberly R. New in District 61, El-Mahdi Holly and Regina Lewis-Ward in District 115, Miriam Paris and Dale Washburn in District 142, and Shaw Blackmon and Robert Dickey in District 144.

¹⁸ See Declaration of John B. Morgan, January 18th, 2022, p. 9.

¹⁹ Id.

Black districts in the Georgia House of Representatives plan in accordance with traditional redistricting principles.

64. I reserve the right to supplement this report in consideration of additional facts, testimony, or materials that may come to light.

Executed on December 5th, 2022.

A handwritten signature in black ink, appearing to read 'Blakeman B. Esselstyn', written over a horizontal line.

Blakeman B. Esselstyn

Esselstyn Report: Attachment A

December 2022

Blakeman (“Blake”) B. Esselstyn

United States: 49 North Street · Asheville, NC 28801-1141

The Netherlands: Schovenlaan 110 · 6225JS Maastricht

blake@mapfigure.com · +1 828-338-8528

EDUCATION

- University of Pennsylvania, School of Engineering and Applied Science, Master of Computer and Information Technology, 2003; GPA 4.0
- Yale University, Geology & Geophysics and International Studies, Bachelor of Arts, 1996

PROFESSIONAL CERTIFICATIONS

- Geographic Information Systems Professional (GISP), #6946, 2009
- American Institute of Certified Planners (AICP), #026364, 2013

EMPLOYMENT (Teaching positions listed separately)

- Redistricting Consultant, dba Mapfigure Consulting (and as Blake Esselstyn), Asheville, NC, 2016-present (and in the Netherlands starting late 2022)
- Principal Consultant, FrontWater, LLC, Asheville, NC, 2015-present
- Urban Planner III – GIS Specialist, City of Asheville Department of Planning and Urban Design, Asheville, NC, 2008-2015
- Urban Planner II, City of Asheville Planning Department, Asheville, NC, 2004-2008
- Independent GIS Consultant, Freelance, Asheville, NC, 2003-2004
- GIS Programmer, Azavea, Inc., Philadelphia, PA, 2002
- Web Support Fellow, University of Pennsylvania, Philadelphia, PA, 2002
- GIS Analyst, Applied Geographics, Inc., Boston, MA, 2001
- GIS Intern, Community and Environmental Spatial Analysis Center, Seattle, WA, 2000
- GIS Analyst, Applied Geographics, Inc., Boston, MA, 2000
- Mapping Technician, Schlosser Geographic Systems, Seattle, WA, 1997
- Digital Mapping Resources Consultant, Social Science Statistical Laboratory at Yale University, New Haven, CT, 1997
- Special Assistant to the CityRoom Coordinator, Neighborhood Partnerships Network, New Haven, CT, 1996-1997

- Lab Monitor, Center for Earth Observation at Yale University, New Haven, CT, 1995

TEACHING EMPLOYMENT

- Adjunct Faculty, Lenoir-Rhyne University, Asheville, NC, 2019
Taught full-semester graduate-level Geographic Information Systems (GIS) course
- Adjunct Faculty, Western Carolina University, Asheville, NC, 2017
Taught full-semester graduate-level GIS course
- GIS Course Assistant, University of Pennsylvania, Philadelphia, PA, 2002-2003
Served as teaching assistant for two undergraduate GIS semester courses
- Teacher, Equity American School, Guatemala City, Guatemala, 1998-1999
Led mathematics department for grades 7-12; taught one technology course
- Teacher, International School of Panama, Panama City, Republic of Panama, 1997-1998
Taught computer programming and mathematics to secondary school students

LITIGATION EXPERIENCE (As GIS and/or redistricting expert)

- Testifying expert for plaintiffs, in *Grant v. Raffensperger*, U.S District Court for the Northern District of Georgia, 2022
- Consulting expert for plaintiffs, in *League of United Latin American Citizens v. Abbott*, U.S District Court for the Western District of Texas, 2022
- Consulting expert for plaintiffs, in *Rivera v. Schwab*, Wyandotte County (KS) District Court, 2022
- Consulting expert for plaintiffs, in *Harper v. Lewis*, Wake County (NC) Superior Court, 2019
- Consulting expert for plaintiffs, in *Common Cause v. Lewis*, Wake County (NC) Superior Court, 2019
- Preparation of redistricting map exhibits used in *Vesilind v. Virginia State Board of Elections*, Richmond (VA) Circuit Court, 2017
- Expert witness analysis, deposition, and testimony for City of Asheville, in *Jensen v. City of Asheville*, Buncombe County (NC) Superior Court, 2009-2010
- Expert witness analysis and testimony for City of Asheville, in *Hall v. City of Asheville*, Buncombe County (NC) Superior Court, 2007
- Expert witness analysis and testimony for City of Asheville, in *Arnold v. City of Asheville*, Buncombe County (NC) Superior Court, 2005

PUBLIC REDISTRICTING PROJECT EXPERIENCE

- Design and completion of adopted electoral redistricting plans for Wake County (NC) Board of Education, 2021-2022
- Design and completion of adopted electoral redistricting plans for Mecklenburg County (NC) Board of Commissioners, 2021
- Design and completion of adopted electoral redistricting plans for Craven County (NC) Board of Commissioners, 2021
- Design and completion of adopted electoral redistricting plans for City of Fayetteville (NC) City Council, 2021
- Design and completion of adopted electoral redistricting plans for City of Greenville (NC) City Council, 2021
- Design and completion of adopted electoral redistricting plans for Town of Cary (NC) Town Council, 2021
- Design and completion of adopted electoral redistricting plans for City of Hickory (NC) City Council, 2021
- Design and completion of adopted electoral redistricting plans for Town of Mooresville (NC) Board of Commissioners, 2021
- Design and completion of adopted electoral redistricting plans for City of Clinton (NC) City Council, 2021
- Design and completion of adopted electoral redistricting plans for Siler City (NC) Board of Commissioners, 2021
- Design and completion of adopted electoral redistricting plans for Town of Tarboro (NC) Town Council, 2021
- Design and completion of adopted electoral redistricting plans for Durham Public Schools (NC) Board of Education, 2021
- Design and completion of adopted electoral redistricting plans for Pitt County (NC) Board of Education, 2021
- Design and completion of adopted electoral redistricting plans for Union County (NC) Board of Education, 2021
- Design and completion of adopted electoral redistricting plans for Edgecombe County (NC) Board of Education, 2021
- Design and completion of adopted electoral redistricting plans (in advance of Census data delivery) for Town of Cary (NC) Town Council, 2021
- Lead presenter, Lenoir-Rhyne University Hands-on Redistricting Workshop, Virtual, 2021
- Software operator and presenter, National Conference of State Legislatures Redistricting Seminar: Redistricting Simulation, Columbus, OH, 2019

- Software operator and presenter, National Conference of State Legislatures Redistricting Seminar: Redistricting Simulation, Providence, RI, 2019
- Hands-on GIS software workshop session leader, Metric Geometry of Gerrymandering Group (MGGG) Conference at the University of Texas, Austin, TX, 2018
- Co-leader of redistricting hackathon, Metric Geometry of Gerrymandering Group (MGGG) Conference at Duke University, Durham, NC, 2017
- Preparation of simulated redistricting plans for Democracy North Carolina's Districting Voter Education Forum, Asheville, NC, 2017
- Hands-on GIS software workshop session assistant, Metric Geometry of Gerrymandering Group (MGGG) Conference at Tufts University, Medford, MA, 2017
- Redistricting software operator (converting retired jurists' instructions into maps), Duke University and Common Cause NC independent redistricting commission simulation, Raleigh, NC *and* Winston-Salem, NC, 2016

SPEAKER OR PANELIST

- "Political Reapportionment: Drawing Boundaries with QGIS," FOSS4G (Free and Open Source Software for Geospatial) Conference, Florence, Italy, 2022
- "Just Maps: How Gerrymandering Imperils the Right to Vote," Osher Lifelong Learning Institute at the University of North Carolina Asheville, virtual, 2022
- "How to Be a Redistricting Watchdog," Duke University's Redistricting and American Democracy Conference, Durham, NC, 2021
- "North Carolina Redistricting with Geographers: Local Knowledge & Community Considerations," American Association of Geographers (AAG) Redistricting Panel Series, Virtual, 2021
- "The Basics of Redistricting for Local Governments," NC Council of School Attorneys Summer Law Conference, Virtual, 2021
- "Census Timing and Redistricting," UNC School of Government: Municipal Attorneys' Winter Conference, Virtual, 2021
- "Census Delays and Redistricting," North Carolina League of Municipalities Online Meeting, Virtual, 2021
- "Redistricting: Ten Big Changes that GIS People Should Know About for 2021," North Carolina GIS Conference, Virtual, 2021
- "Demographics, the Census, and a Bit about Redistricting," UNC School of Government: County Attorneys Conference, Virtual, 2021
- "NC Redistricting Updates for the GIS Community," Mountain Region GIS Alliance, Virtual, 2021

- “The Census and Demographics,” UNC School of Government: Redistricting for Local Governments Conference, Virtual, 2021
- “The Mechanics of Redistricting,” UNC School of Government: Redistricting for Local Governments Conference, Virtual, 2021
- “Ask the Experts Panel,” National Conference of State Legislatures (NCSL) Redistricting Seminar, Virtual, 2021
- “GIS and the Data Handoff,” National Conference of State Legislatures (NCSL) Redistricting Seminar, Virtual, 2021
- “Electoral Redistricting for School Boards after the 2020 Census,” North Carolina School Boards Association 2020 Annual Conference, Virtual, 2020
- “Redistricting Software 2021: The Next Generation of Tools Could Open New Doors,” Urban and Regional Information Systems Association (URISA) GIS-Pro Conference, Virtual, 2020
- “Changing Demographics, Drawing Districts, and County Impacts,” North Carolina Association of County Commissioners 113th Annual Conference, Virtual, 2020
- “QGIS and democracy: Redistricting and reapportionment with QGIS,” QGIS North America Conference, Virtual, 2020
- “Does Your Vote Count?: The Impact of Gerrymandering,” virtual panel hosted by League of Women Voters Asheville Buncombe, NC, 2020
- [Scheduled, but cancelled due to COVID-19] “Redistricting with QGIS,” Free and Open Source Software for Geospatial Conference, Calgary, Alberta, Canada, 2020
- [Scheduled, but cancelled due to COVID-19] Teaching Faculty (session title to be determined), National Conference of State Legislatures Redistricting Seminar, Las Vegas, NV, 2020
- [Scheduled, but cancelled due to COVID-19] “Census Geography, Precision, & Privacy,” Census Symposium, University of North Carolina Asheville, NC, 2020
- “The State of Redistricting Software and Data Resources for 2020,” Quantitative Investigations of Gerrymandering and Redistricting Conference, Duke University, Durham, NC, 2020
- “School Board Elections,” 53rd School Attorneys’ Conference, UNC School of Government, Chapel Hill, NC, 2020
- “Methods and Techniques in Redistricting,” Harvard Geography of Redistricting Conference, Cambridge, MA, 2019
- “Redistricting Software: A new generation of geospatial tools,” North Carolina GIS Conference, Winston-Salem, NC, 2019
- “The Latest Mapping Technology,” Reason, Reform & Redistricting Conference, Duke University, Durham, NC, 2019

- “Redistricting—What Happens Now?” Voter Education Panel hosted by League of Women Voters (and others), Hendersonville, NC, 2019
- “What are all These Districts? How did We Get Here, and Redistricting Reform,” Grassroots Democracy: A Nonpartisan Voter Education Series, Leicester, NC, 2019
- “Re-GIS-tracting? A new generation of redistricting geo-tools,” Mountain Region GIS Alliance, Asheville, NC, 2019
- “Representing (mis)representation,” Tapestry Data Storytelling Conference, University of Miami, Miami, FL, 2018
- “A Redistricting Tour,” Democracy in our Hands Conference, Asheville, NC, 2018
- “Dis-tricks: GIS and Public Understanding of Redistricting,” NC ArcGIS Users Group, Asheville, NC, 2018
- “Visual Explanations of Gerrymandering,” Highlands Indivisible, Highlands, NC, 2018
- “Dave’s Redistricting App,” Metric Geometry of Gerrymandering Workshop, University of Texas, Austin, TX, 2018
- “Districting Voter Education Forum,” Democracy North Carolina, Asheville, NC, 2017
- “When GIS leads planners astray,” American Planning Association National Conference, New York, NY, 2017
- “Conveying Uncertainty with GIS,” Azavea, Philadelphia, PA, 2017
- “GISkepticism,” Appalachian State University, Boone, NC, 2017
- “When GIS leads planners astray,” North Carolina Planning Conference, American Planning Association North Carolina Chapter, Asheville, NC, 2016
- “What if the ‘S’ in GIS stood for Skepticism?” Mountain Region GIS Alliance, Asheville, NC, 2015
- “Open Data? Show Me the Money!” North Carolina GIS Conference, Raleigh, NC, 2015

TEACHING AS SINGLE-CLASS GUEST SPEAKER (On redistricting and/or GIS)

- Lenoir-Rhyne University, Public Policy Course (speaking on redistricting and representation), 2021
- Lenoir-Rhyne University, Geographic Information Systems Course (speaking on GIS), 2021
- University of North Carolina Asheville, Mathematics: Voting Theory Course (speaking on redistricting), 2020
- Metric Geometry and Gerrymandering Group Redistricting Lab (Tufts University + MIT), Geodata Bootcamp Mapmaking Session (speaking on redistricting software), 2020

- [Scheduled, but cancelled due to COVID-19] Duke University, Law School: Election Law Course (leading hands-on redistricting simulation exercise), April 2020
- Duke University, Data Science Capstone Seminar (speaking on data science professional/career advice), 2020
- University of North Carolina Asheville, Political Science: Census Course (speaking on redistricting), 2020
- Lenoir-Rhyne University, Public Policy Course (speaking on redistricting), 2019
- Western Carolina University, Geographic Information Systems Course (speaking on GIS), 2019
- Duke University, Democracy Lab Seminar (speaking on redistricting software tools), 2018
- University of North Carolina Asheville, Political Science: US Elections Course (speaking on redistricting), 2018
- University of North Carolina Asheville, Mathematics: Voting Theory Course (speaking on redistricting), 2018
- Lenoir-Rhyne University, Sustainability Management & Decision-Making Course (speaking on GIS/location intelligence), 2018
- Yale University, School of Organization and Management: Business Information Course (speaking on Maptitude—one class + multiple labs), 1997

MEDIA APPEARANCES, OP-EDS, AND CITATIONS

- “Gerrymandered or no? How will courts judge new North Carolina political maps?” *Raleigh News & Observer*, February 8, 2022
- “Monster: Math, maps and power in North Carolina,” special podcast series from *Raleigh News & Observer*, September 24, 2021
- “Census data has arrived. What comes next?” *Chatham News + Record*, September 1, 2021
- “An Explainer for Redistricting Criteria, Part 1: Political Boundaries,” *John Locke Foundation*, August 23, 2021
- “Special report: Demystifying the redistricting process,” *NC Policy Watch*, August 20, 2021
- “Raleigh, Cary and other NC cities may have to push back their 2021 elections,” *Raleigh News & Observer*, February 24, 2021
- “Triad Cities Awaiting Census Data May Delay Elections,” WFDD Radio, February 17, 2021
- Live interview, WPTF Radio Afternoon News, February 15, 2021
- “Census Delays Could Delay Charlotte City Council, CMS Fall Elections,” WFAE Radio, January 28, 2021

- “What do Buncombe's new district lines mean for 2020 commissioner elections?” (map citation), *Asheville Citizen-Times*, November 21, 2019
- “Confused about new legislative districts? This ‘map geek’ can help,” *NC Policy Watch*, November 21, 2019
- “Which district are you in? After gerrymandering fight, Asheville, Buncombe get final state districts,” *Asheville Citizen-Times*, November 4, 2019
- “Suggestions for a fair redistricting process,” *Princeton Election Consortium*, September 16, 2019
- “How will Asheville, Buncombe County be affected by gerrymandering decision?” *Asheville Citizen-Times*, September 6, 2019
- “2019 Districting,” JMPRO TV's *The Weekly Update*, September 1, 2019
- “As redistricting battle continues in NC, League of Women Voters holds panel,” *WLOS-TV*, August 11, 2019
- “With No Supreme Court End to Gerrymandering, Will States Make It More Extreme?” (citation/link of blog article), *New York Times*, June 28, 2019
- “The Supreme Court takes on gerrymandering. A cottage industry wants to prove it's gone too far,” *USA Today*, March 26, 2019
- “Gerrymandering: 'Packing' and 'Cracking,' the meat and potatoes of partisan redistricting,” *USA Today*, March 25, 2019
- “NC gerrymandering: Turner, McGrady lead reform effort on redistricting,” *Asheville Citizen-Times*, February 14, 2019
- “Looking for a Way Forward on Redistricting Reform,” *Duke Today*, January 28, 2019
- “Will Asheville try to stop the state from splitting it into districts?” (map citation), *Asheville Citizen-Times*, January 23, 2019
- “Some takeaways from NC's elections,” *WRAL.com*, Nov 7, 2018
- “New Asheville districts are racial gerrymandering, black council members say” *Asheville Citizen-Times*, July 2, 2018
- “Legislature sets up districts for Asheville council, eliminates primaries” (map citation), *Asheville Citizen-Times*, June 27, 2018
- “Van Duyn to back Asheville council districts bill if Senate shifts election dates” (map citation), *Asheville Citizen-Times*, June 21, 2018
- “I Ran the Worst 5K of My Life So I Could Explain Gerrymandering to You,” *POLITICO Magazine*, November 15, 2017
- “Event to cover Nov. vote on City Council districts,” *Asheville Citizen-Times*, October 17, 2017

- “Republicans silent in wake of court order to draw new maps in one month,” *NC Policy Watch*, August 2, 2017
- “Who makes the grade? This week’s editorial report card,” *Asheville Citizen-Times*, June 2, 2017
- “Asheville grows; Charlotte, Raleigh and their suburbs grow faster,” *Asheville Citizen-Times*, May 29, 2017
- “Boundary issues: Where does Asheville end?” (op-ed), *Mountain Xpress*, April 29, 2016
- “For better or worse, Asheville growth inevitable,” *Asheville Citizen-Times*, November 21, 2015
- “St. Lawrence Green no litmus test for voters” (op-ed), *Mountain Xpress*, October 29, 2015

PUBLISHED WORK

- “Redistricting Software Applications, Data, and Related Tools,” supplement to *Redistricting: A Guide for the GIS Community*, Urban and Regional Information Systems Association, 2021
- (Co-authored with Mark Salling, PhD, GISP) “GIS Software Functionality for Redistricting,” *The GIS Professional*, Issue 301, Urban and Regional Information Systems Association, May/June 2021
- (Co-authored with Joan Gardner, Suzanne Rotwein, and Tong Zhang) “Integrating GIS and Social Marketing at HCFA,” *ESRI Map Book*, Volume 16, ESRI Press, 2001

SELF-PUBLISHED PUBLIC-FACING EXPLANATORY WRITING & MAPS

- (Co-authored with Christopher Cooper, Gregory Herschlag, Jonathan Mattingly, Rebecca Tippet) “NC General Assembly County Clusterings from the 2020 Census,” *Quantifying Gerrymandering Blog*, August 17, 2021
- (Co-authored with Christopher Cooper, Gregory Herschlag, Jonathan Mattingly, Rebecca Tippet) “Legislative County Clustering in North Carolina—Looking towards the 2020 Census,” *Quantifying Gerrymandering Blog*, July 16, 2021
- Created the blogs at districks.com (2017) and mapfigure.com (2020) — the story maps “A ‘Stephenson’ explainer” and “Could COVID repercussions delay NC elections in 2021 & 2022?” have each been viewed more than 2,000 times.

REDISTRICTING AND GIS SOFTWARE EXPERIENCE

- MapInfo (first used 1996)
- Maptitude (first used 1997)
- Esri ArcGIS/ArcInfo/ArcView (first used 2000)

- QGIS (first used 2015)
- Maptitude for Redistricting (first used 2016)
- Dave's Redistricting App (first used 2016)
- DistrictBuilder (first used 2017)
- Esri Redistricting (first used 2018)
- Districtr (first used 2019)
- Statto Software Redistricter (first used 2019)
- ArcBridge DISTRICTSolv (first used 2020)

SELECTED AWARDS (As team member)

- G. Herbert Stout Award for Visionary use of GIS by Local Government, 2009
- International Economic Development Council, Excellence in New Media Initiatives, 2008
- Marvin Collins Outstanding Planning Award for Innovations in Planning Services, Education, and Public Involvement, 2007

SERVICE AS ELECTION OFFICIAL

- Poll worker for multiple elections in Buncombe County, North Carolina (2012, 2020, 2022) and King County, Washington (2000), including as Chief Precinct Judge in 2020 general election and 2022 primary election

SERVICE ON BOARDS AND COMMISSIONS

- Asheville City Council Appointee to Comprehensive Plan Advisory Committee, 2016-2018

ADDITIONAL TRAINING

- Introduction to GIS for Equity and Social Justice, Urban and Regional Information Systems Association Certified Workshop, Virtual, 2020
- Public Data, Public Access, Privacy, and Security: U.S. Law and Policy, Urban and Regional Information Systems Association Certified Workshop, Raleigh, NC, 2015
- An Overview of Open Source GIS Software, Urban and Regional Information Systems Association Certified Workshop, Portland, OR, 2012

- An Introduction to Public Participation GIS: Using GIS to Support Community Decision Making, Urban and Regional Information Systems Association Certified Workshop, Orlando, FL, 2010
- 3-D Geospatial Best Practices and Project Implementation Methods, Urban and Regional Information Systems Association Certified Workshop, Vancouver, BC (Canada), 2006

MEMBERSHIPS

- Urban and Regional Information Systems Association (URISA)
- Mountain Region GIS Alliance (MRGAC)
- American Planning Association (APA)

Esselstyn Report: Attachment B

Data sources, software, and methodology

1. I arrived at the findings in the expert report using data from the United States Census Bureau's website (<https://www.census.gov>). This federal agency produces a) geographic files—e.g., county boundaries and block boundaries, b) tables of the block-level demographic information yielded specifically for redistricting (sometimes referred to as the PL 94-171 data) from the decennial census counts, c) “block assignment files,” which are important for linking geography data to other data, and d) other interactive web-based resources. Representative links for these four categories of data are provided below:

- a) <https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-line-file.2020.html>
- b) <https://data.census.gov/cedsci/all?q=&y=2020&d=DEC%20Redistricting%20Data%20%28PL%2094-171%29>
- c) <https://www.census.gov/geographies/reference-files/time-series/geo/block-assignment-files.html>
- d) <https://www.census.gov/library/stories/state-by-state/georgia-population-change-between-census-decade.html>

2. Another key source of information for the analysis was the Georgia General Assembly's Legislative and Congressional Reapportionment Office webpage, available at <https://www.legis.ga.gov/joint-office/reapportionment>. This webpage provided links to representations of the enacted State Senate and State House plans, as well as statistical summaries for the plans and copies of the Reapportionment Committee Guidelines for each chamber.

3. The list of residential addresses of elected Georgia General Assembly legislators was provided to me by counsel. To associate those addresses with coordinates on a map, I used the *Google Maps Platform's Geocoding API*.

4. The primary software application I used in the analysis of maps and the creation of the illustrative plans is *Maptitude for Redistricting*, produced by the Caliper Corporation. This specialized geographic information system (GIS) software allows for the importing, interconnecting, and synthesis of the multiple Census Bureau data files listed above. It allows for an existing plan to be imported (like the enacted plans from the Georgia General Assembly), then modified, or plans can be created starting from a blank template. The application generates not only the aggregated statistics for each of the created districts, but also can supply reports on overall characteristics of the plan like average district compactness and population deviation. *Maptitude for Redistricting* is widely used by state and local governments for redistricting and is in fact used by the Georgia General Assembly.

5. For the production of the visual figures in the report, I used two other pieces of software. For the maps, I used a separate open-source GIS software tool called *QGIS*. *QGIS* enabled me to take geographic files exported from *Maptitude for Redistricting* and create high-resolution graphics for insertion into the document with myriad options for customization of visual elements. For the graphs and charts, I used *Microsoft Excel*.

Esselstyn Report: Attachment C

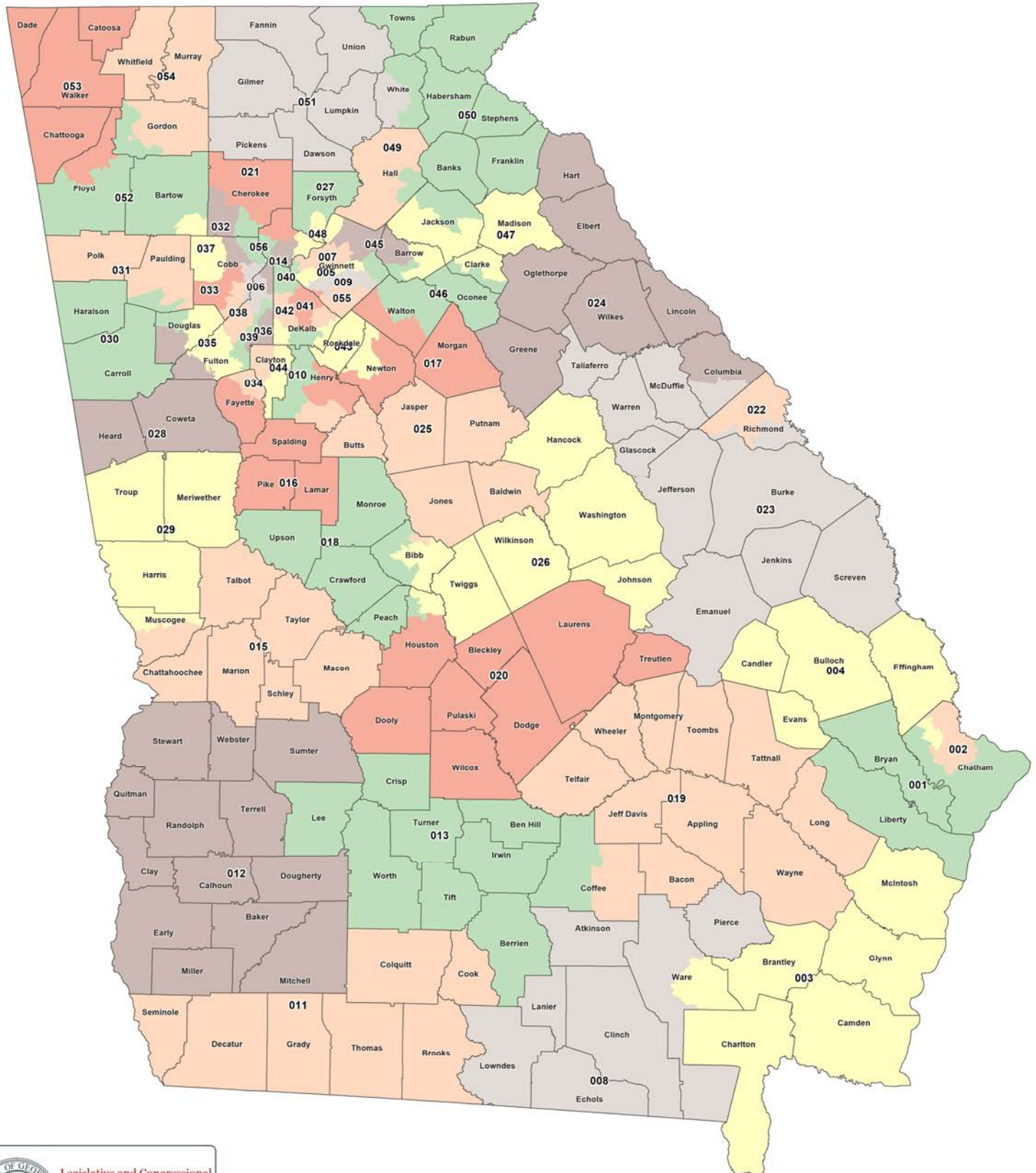
County	Total population	% single race			% single race			% Black alone		
		% single race White	% single race Black	American Indian and Alaska Native	% single race Asian	% single race Pacific Islander	% other single race	% two or more races	or in combination	% Hispanic or Latino
Appling	18,444	70.9%	18.4%	0.5%	0.7%	0.0%	5.7%	3.8%	19.8%	9.9%
Atkinson	8,286	63.7%	14.6%	0.8%	0.2%	0.0%	12.5%	8.1%	15.5%	24.7%
Bacon	11,140	74.1%	15.8%	0.1%	0.4%	0.0%	5.1%	4.5%	17.7%	7.9%
Baker	2,876	53.4%	39.3%	0.0%	0.6%	0.0%	2.5%	4.1%	41.0%	5.0%
Baldwin	43,799	51.7%	42.0%	0.2%	1.4%	0.1%	1.5%	3.1%	43.3%	2.6%
Banks	18,035	87.8%	2.2%	0.6%	1.1%	0.1%	2.8%	5.4%	3.3%	6.5%
Barrow	83,505	69.0%	12.4%	0.5%	3.9%	0.0%	6.0%	8.1%	14.3%	12.6%
Bartow	108,901	75.7%	10.6%	0.4%	1.1%	0.0%	4.9%	7.3%	12.3%	9.9%
Ben Hill	17,194	54.9%	36.4%	0.4%	0.7%	0.0%	3.2%	4.4%	38.0%	6.1%
Berrien	18,160	80.6%	10.8%	0.2%	0.4%	0.1%	2.6%	5.3%	12.1%	5.8%
Bibb	157,346	36.7%	54.6%	0.2%	2.1%	0.0%	2.4%	4.0%	56.5%	4.3%
Bleckley	12,583	71.7%	22.4%	0.2%	1.2%	0.1%	1.6%	2.9%	23.5%	3.7%
Brantley	18,021	91.2%	3.2%	0.3%	0.2%	0.0%	0.7%	4.4%	4.1%	1.8%
Brooks	16,301	57.1%	35.1%	0.3%	0.4%	0.0%	2.8%	4.3%	36.5%	5.9%
Bryan	44,738	72.0%	14.5%	0.3%	2.4%	0.1%	2.2%	8.5%	16.7%	7.3%
Bulloch	81,099	62.5%	28.4%	0.3%	1.6%	0.1%	2.3%	4.8%	30.1%	5.2%
Burke	24,596	49.5%	44.8%	0.2%	0.4%	0.1%	1.3%	3.7%	46.5%	3.2%
Butts	25,434	66.1%	26.9%	0.2%	0.4%	0.0%	1.7%	4.7%	28.4%	3.2%
Calhoun	5,573	32.0%	64.3%	0.1%	0.3%	0.0%	1.8%	1.4%	65.1%	2.7%
Camden	54,768	70.1%	17.7%	0.5%	1.6%	0.1%	2.1%	7.9%	20.2%	6.7%
Candler	10,981	61.6%	24.5%	0.3%	0.6%	0.0%	7.4%	5.5%	25.6%	12.5%
Carroll	119,148	69.3%	18.6%	0.4%	0.9%	0.0%	4.2%	6.6%	20.7%	8.0%
Catoosa	67,872	88.3%	2.7%	0.4%	1.5%	0.1%	1.3%	5.7%	3.9%	3.4%
Charlton	12,518	69.9%	21.0%	0.4%	0.9%	0.0%	4.3%	3.6%	22.4%	16.3%
Chatham	295,291	48.7%	37.0%	0.4%	3.6%	0.2%	3.9%	6.2%	39.1%	8.1%
Chattahoochee	9,565	62.4%	15.8%	0.5%	3.2%	1.2%	6.1%	10.9%	19.1%	16.8%
Chattooga	24,965	81.3%	9.6%	0.4%	0.4%	0.0%	3.4%	4.8%	11.5%	5.2%
Cherokee	266,620	76.8%	6.7%	0.5%	2.1%	0.0%	4.7%	9.2%	8.1%	12.0%
Clarke	128,671	58.2%	24.6%	0.5%	3.9%	0.1%	6.1%	6.7%	26.2%	11.1%
Clay	2,848	40.4%	56.1%	0.0%	0.2%	0.0%	0.3%	3.0%	57.4%	1.4%
Clayton	297,595	10.3%	69.9%	0.7%	4.6%	0.1%	8.8%	5.7%	72.7%	14.3%
Clinch	6,749	63.8%	29.1%	0.4%	0.3%	0.2%	2.1%	3.9%	31.1%	3.7%
Cobb	766,149	50.6%	26.6%	0.6%	5.6%	0.1%	7.1%	9.5%	29.1%	14.5%
Coffee	43,092	59.0%	27.8%	0.5%	0.7%	0.1%	6.9%	5.0%	29.2%	12.6%
Colquitt	45,898	59.4%	21.9%	0.9%	0.8%	0.0%	10.5%	6.5%	23.2%	19.0%
Columbia	156,010	65.4%	18.1%	0.3%	4.6%	0.2%	2.5%	8.8%	20.8%	7.6%
Cook	17,229	63.7%	27.7%	0.4%	0.6%	0.1%	3.1%	4.4%	29.1%	6.6%
Coweta	146,158	69.6%	17.7%	0.4%	2.3%	0.0%	3.2%	6.8%	19.4%	7.6%
Crawford	12,130	74.3%	18.7%	0.5%	0.3%	0.0%	1.3%	5.0%	20.2%	3.4%
Crisp	20,128	49.7%	44.1%	0.2%	0.9%	0.0%	1.9%	3.2%	45.7%	3.1%
Dade	16,251	91.7%	0.9%	0.5%	0.8%	0.0%	0.8%	5.3%	1.4%	2.2%
Dawson	26,798	89.0%	0.8%	0.3%	0.9%	0.1%	2.5%	6.4%	1.5%	6.0%
Decatur	29,367	49.6%	41.7%	0.4%	0.6%	0.1%	4.1%	3.6%	42.8%	6.5%
DeKalb	764,382	29.5%	50.9%	0.6%	6.6%	0.0%	5.9%	6.5%	53.3%	10.7%
Dodge	19,925	65.3%	29.5%	0.1%	0.5%	0.1%	1.4%	3.1%	30.9%	3.1%
Dooley	11,208	41.9%	49.6%	0.2%	0.5%	0.0%	5.0%	2.8%	50.4%	7.1%
Dougherty	85,790	24.5%	69.9%	0.2%	0.8%	0.0%	1.6%	3.0%	71.6%	2.8%
Douglas	144,237	36.2%	48.4%	0.5%	1.6%	0.1%	5.8%	7.3%	51.5%	11.1%
Early	10,854	44.8%	51.2%	0.3%	0.4%	0.0%	0.6%	2.6%	52.4%	1.7%
Echols	3,697	68.5%	4.2%	1.8%	0.3%	0.0%	14.7%	10.4%	5.2%	29.5%
Effingham	64,769	75.9%	13.7%	0.4%	1.1%	0.1%	2.1%	6.9%	15.5%	5.4%
Elbert	19,637	65.3%	26.9%	0.3%	0.9%	0.0%	2.6%	3.9%	28.1%	5.1%
Emanuel	22,768	61.6%	31.9%	0.3%	0.6%	0.0%	2.5%	3.1%	33.2%	4.4%
Evans	10,774	57.9%	28.9%	0.3%	0.8%	0.1%	6.4%	5.6%	30.4%	11.5%
Fannin	25,319	93.0%	0.3%	0.4%	0.4%	0.0%	1.3%	4.5%	0.8%	3.0%
Fayette	119,194	58.5%	24.8%	0.3%	5.4%	0.0%	3.3%	7.6%	26.9%	8.0%
Floyd	98,584	70.5%	14.3%	0.7%	1.3%	0.0%	5.9%	7.3%	15.8%	11.6%
Forsyth	251,283	65.1%	4.3%	0.4%	18.0%	0.0%	4.1%	8.1%	5.3%	10.0%
Franklin	23,424	83.0%	8.1%	0.2%	1.1%	0.0%	2.8%	4.7%	9.4%	4.8%
Fulton	1,066,710	39.3%	42.5%	0.3%	7.6%	0.0%	3.6%	6.6%	44.8%	8.1%
Gilmer	31,353	86.0%	0.5%	0.8%	0.5%	0.0%	6.5%	5.7%	0.9%	11.5%
Glascocock	2,884	89.8%	6.8%	0.0%	0.2%	0.1%	0.1%	2.9%	7.8%	1.8%
Glynn	84,499	64.2%	24.5%	0.4%	1.4%	0.1%	3.7%	5.7%	26.2%	7.5%

County	Total population	% single race				% single race		% Black alone			% Hispanic or Latino
		% single race White	% single race Black	American Indian and	% single race Asian	Hawaiian or	% other single race	% two or more races	or in combination		
				Alaska Native		Pacific Islander					
Gordon	57,544	78.4%	3.7%	0.6%	1.3%	0.0%	8.0%	8.0%	5.1%	15.6%	
Grady	26,236	57.4%	28.0%	1.0%	0.5%	0.0%	8.0%	5.1%	29.3%	12.5%	
Greene	18,915	59.7%	30.7%	0.2%	0.9%	0.0%	3.7%	4.7%	31.9%	6.8%	
Gwinnett	957,062	35.5%	27.4%	0.8%	13.3%	0.1%	12.1%	10.7%	30.1%	23.0%	
Habersham	46,031	78.7%	3.8%	0.5%	2.2%	0.1%	6.6%	8.1%	4.7%	14.9%	
Hall	203,136	64.4%	7.2%	0.9%	2.1%	0.1%	14.4%	11.0%	8.4%	28.1%	
Hancock	8,735	27.7%	69.0%	0.3%	0.4%	0.0%	0.3%	2.3%	70.2%	0.7%	
Haralson	29,919	90.3%	4.2%	0.2%	0.6%	0.0%	0.7%	3.9%	5.2%	1.7%	
Harris	34,668	76.0%	15.1%	0.4%	1.1%	0.1%	1.4%	5.9%	16.6%	4.1%	
Hart	25,828	75.3%	16.8%	0.2%	1.3%	0.0%	1.8%	4.6%	18.3%	3.6%	
Heard	11,412	84.8%	8.3%	0.3%	0.5%	0.1%	0.9%	5.3%	10.0%	2.2%	
Henry	240,712	37.1%	49.1%	0.3%	3.4%	0.1%	3.6%	6.5%	52.0%	7.7%	
Houston	163,633	54.1%	32.2%	0.4%	3.0%	0.1%	3.0%	7.3%	34.5%	7.2%	
Irwin	9,666	67.1%	23.1%	0.2%	1.2%	0.0%	5.2%	3.2%	24.1%	6.9%	
Jackson	75,907	79.7%	6.9%	0.3%	2.3%	0.1%	4.1%	6.6%	8.1%	8.8%	
Jasper	14,588	74.8%	16.9%	0.3%	0.2%	0.1%	2.5%	5.3%	18.3%	4.7%	
Jeff Davis	14,779	70.1%	15.6%	0.6%	0.4%	0.0%	8.5%	4.9%	16.9%	13.9%	
Jefferson	15,709	44.2%	50.8%	0.3%	0.4%	0.0%	1.7%	2.6%	52.3%	2.9%	
Jenkins	8,674	53.9%	40.9%	0.4%	0.1%	0.1%	2.1%	2.4%	41.9%	3.5%	
Johnson	9,189	63.4%	33.0%	0.3%	0.3%	0.2%	0.5%	2.4%	34.0%	1.3%	
Jones	28,347	71.3%	23.9%	0.2%	0.5%	0.0%	0.7%	3.5%	25.1%	1.7%	
Lamar	18,500	67.4%	26.6%	0.1%	0.6%	0.0%	1.1%	4.2%	28.2%	2.6%	
Lanier	9,877	68.8%	22.0%	0.4%	0.8%	0.2%	1.9%	5.8%	24.0%	5.8%	
Laurens	49,570	56.8%	37.0%	0.2%	1.0%	0.0%	1.6%	3.4%	38.6%	2.9%	
Lee	33,163	69.3%	22.2%	0.2%	2.6%	0.0%	1.1%	4.5%	23.4%	2.9%	
Liberty	65,256	39.8%	43.1%	0.5%	2.1%	0.7%	4.1%	9.7%	47.7%	11.9%	
Lincoln	7,690	68.1%	27.6%	0.2%	0.3%	0.0%	0.3%	3.4%	28.8%	1.2%	
Long	16,168	56.9%	25.5%	0.8%	1.1%	0.6%	5.6%	9.5%	29.3%	12.2%	
Lowndes	118,251	51.7%	37.6%	0.4%	1.7%	0.1%	2.7%	5.8%	39.5%	6.7%	
Lumpkin	33,488	88.8%	1.3%	0.6%	0.8%	0.1%	2.1%	6.4%	2.0%	5.3%	
Macon	12,082	34.4%	59.3%	0.3%	1.3%	0.1%	2.7%	2.0%	60.4%	3.9%	
Madison	30,120	79.6%	9.2%	0.3%	1.8%	0.0%	3.4%	5.8%	10.6%	6.5%	
Marion	7,498	60.7%	28.7%	0.3%	0.7%	0.2%	4.6%	4.7%	29.6%	7.5%	
McDuffie	21,632	53.5%	40.1%	0.2%	0.4%	0.1%	1.6%	4.0%	41.8%	3.7%	
McIntosh	10,975	65.1%	29.1%	0.3%	0.4%	0.0%	0.6%	4.4%	31.0%	2.1%	
Meriwether	20,613	59.3%	35.3%	0.3%	0.4%	0.0%	1.0%	3.6%	36.6%	2.3%	
Miller	6,000	66.4%	29.2%	0.2%	0.5%	0.1%	0.9%	2.7%	30.5%	2.3%	
Mitchell	21,755	47.2%	46.5%	0.2%	0.5%	0.0%	2.8%	2.7%	47.8%	4.4%	
Monroe	27,957	72.0%	21.9%	0.2%	0.9%	0.0%	1.1%	4.0%	23.0%	2.6%	
Montgomery	8,610	67.2%	24.8%	0.3%	0.5%	0.0%	3.8%	3.5%	25.8%	6.6%	
Morgan	20,097	72.7%	20.5%	0.2%	0.6%	0.0%	1.9%	4.0%	21.6%	3.5%	
Murray	39,973	83.4%	0.7%	1.5%	0.3%	0.0%	7.0%	7.0%	1.4%	14.8%	
Muscogee	206,922	39.9%	46.5%	0.4%	2.7%	0.3%	3.2%	7.1%	49.4%	8.0%	
Newton	112,483	42.7%	46.9%	0.3%	0.9%	0.1%	3.3%	5.7%	49.7%	6.4%	
Oconee	41,799	82.4%	4.6%	0.2%	5.0%	0.0%	2.1%	5.7%	5.5%	5.6%	
Oglethorpe	14,825	74.7%	15.2%	0.4%	0.9%	0.0%	2.8%	6.0%	16.6%	5.9%	
Paulding	168,661	65.9%	22.1%	0.4%	1.2%	0.1%	3.0%	7.3%	24.5%	7.4%	
Peach	27,981	44.7%	43.7%	0.4%	0.7%	0.0%	5.3%	5.2%	45.2%	9.1%	
Pickens	33,216	91.5%	0.9%	0.4%	0.6%	0.0%	1.4%	5.1%	1.5%	3.6%	
Pierce	19,716	84.5%	8.1%	0.4%	0.4%	0.0%	2.8%	3.7%	9.1%	5.1%	
Pike	18,889	87.0%	7.7%	0.2%	0.4%	0.0%	0.7%	4.0%	8.5%	1.8%	
Polk	42,853	72.9%	12.2%	0.8%	0.6%	0.1%	7.8%	5.7%	13.6%	13.0%	
Pulaski	9,855	61.9%	32.2%	0.1%	0.9%	0.0%	2.0%	2.8%	33.0%	3.3%	
Putnam	22,047	66.5%	24.6%	0.4%	0.5%	0.0%	2.8%	5.2%	25.9%	7.1%	
Quitman	2,235	53.2%	41.1%	0.6%	0.5%	0.0%	0.4%	4.1%	43.2%	1.4%	
Rabun	16,883	89.0%	0.7%	0.4%	0.4%	0.0%	3.1%	6.4%	1.2%	8.6%	
Randolph	6,425	35.1%	60.3%	0.2%	0.3%	0.0%	1.4%	2.6%	61.4%	2.2%	
Richmond	206,607	34.4%	55.3%	0.3%	1.9%	0.2%	2.3%	5.6%	58.1%	5.5%	
Rockdale	93,570	27.4%	58.1%	0.3%	1.6%	0.1%	5.7%	6.6%	61.1%	10.2%	
Schley	4,547	75.3%	19.3%	0.1%	0.4%	0.0%	1.1%	3.7%	20.5%	3.8%	
Screven	14,067	57.5%	37.7%	0.4%	0.4%	0.1%	0.8%	3.2%	39.3%	2.0%	
Seminole	9,147	61.9%	32.7%	0.1%	0.7%	0.0%	1.4%	3.2%	33.8%	2.5%	
Spalding	67,306	56.2%	34.6%	0.4%	1.0%	0.0%	2.5%	5.3%	36.4%	5.4%	

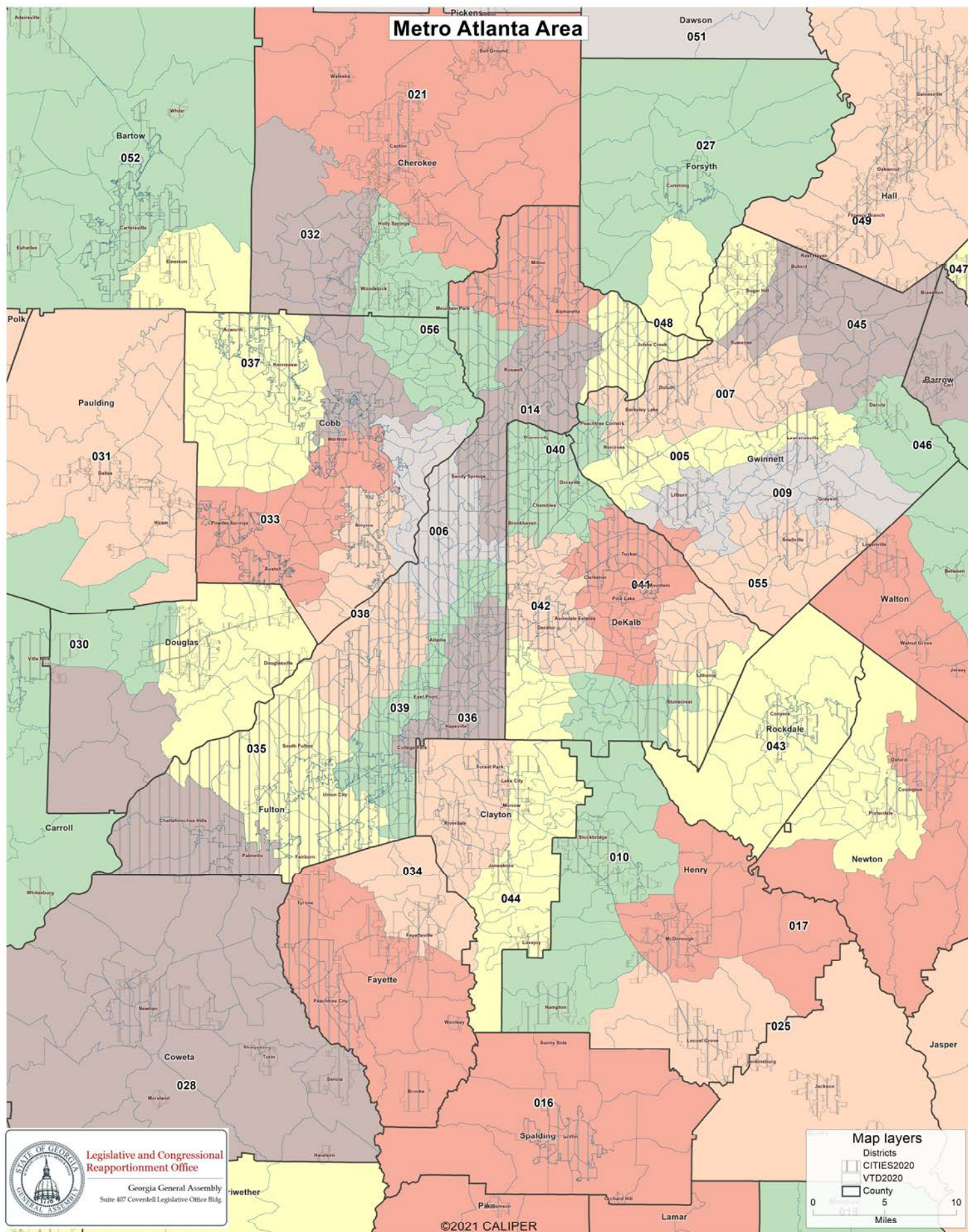
County	Total population	% single race				% single race		% Black alone			% Hispanic or Latino
		% single race White	% single race Black	American Indian and		Hawaiian or		or in combination			
				Alaska Native	% single race Asian	Pacific Islander	% other single race		% two or more races		
Stephens	26,784	80.6%	11.1%	0.4%	0.9%	0.0%	1.1%	5.9%	13.2%	3.2%	
Stewart	5,314	25.4%	46.4%	0.2%	3.2%	0.1%	22.1%	2.5%	47.8%	22.9%	
Sumter	29,616	39.8%	51.1%	0.3%	1.7%	0.0%	4.1%	3.1%	52.5%	6.0%	
Talbot	5,733	42.9%	53.7%	0.1%	0.3%	0.0%	0.2%	2.8%	54.9%	2.0%	
Taliaferro	1,559	38.9%	53.4%	0.3%	0.4%	0.0%	1.8%	5.3%	56.2%	4.4%	
Tattnall	22,842	62.5%	26.3%	0.4%	0.6%	0.0%	5.6%	4.6%	27.7%	10.1%	
Taylor	7,816	59.4%	36.2%	0.3%	0.5%	0.1%	0.8%	2.8%	37.7%	2.1%	
Telfair	12,477	58.3%	37.1%	0.3%	0.3%	0.0%	1.7%	2.4%	38.1%	15.5%	
Terrell	9,185	35.2%	60.6%	0.1%	0.7%	0.0%	0.6%	2.6%	62.1%	1.9%	
Thomas	45,798	57.6%	35.7%	0.4%	0.9%	0.0%	1.6%	3.8%	37.1%	3.4%	
Tift	41,344	56.2%	29.3%	0.3%	1.6%	0.0%	6.7%	5.8%	30.8%	12.6%	
Toombs	27,030	61.3%	26.0%	0.4%	0.8%	0.0%	6.5%	5.1%	27.4%	11.3%	
Towns	12,493	92.8%	1.0%	0.2%	0.6%	0.0%	1.5%	3.8%	1.3%	3.3%	
Treutlen	6,406	64.1%	31.6%	0.3%	0.1%	0.0%	1.0%	2.8%	33.0%	2.7%	
Troup	69,426	55.7%	35.0%	0.3%	2.3%	0.1%	2.5%	4.2%	36.7%	4.3%	
Turner	9,006	53.4%	40.7%	0.1%	0.6%	0.0%	1.9%	3.3%	42.3%	4.1%	
Twiggs	8,022	56.4%	38.9%	0.3%	0.5%	0.0%	0.5%	3.5%	40.2%	1.5%	
Union	24,632	92.7%	0.5%	0.4%	0.4%	0.0%	1.1%	4.9%	0.9%	3.3%	
Upson	27,700	65.5%	28.5%	0.3%	0.5%	0.0%	1.3%	3.8%	30.1%	2.3%	
Walker	67,654	88.9%	4.2%	0.3%	0.4%	0.1%	1.1%	5.0%	5.4%	2.5%	
Walton	96,673	72.0%	17.9%	0.3%	1.5%	0.1%	2.6%	5.6%	19.5%	5.4%	
Ware	36,251	62.4%	29.7%	0.3%	0.9%	0.0%	2.4%	4.3%	31.5%	4.4%	
Warren	5,215	38.2%	58.5%	0.3%	0.3%	0.1%	0.3%	2.3%	60.0%	1.0%	
Washington	19,988	42.4%	53.7%	0.2%	0.4%	0.0%	0.8%	2.5%	54.9%	1.7%	
Wayne	30,144	72.5%	19.8%	0.3%	0.6%	0.0%	2.5%	4.2%	21.2%	5.7%	
Webster	2,348	48.8%	45.3%	0.1%	0.5%	0.3%	0.9%	4.2%	47.1%	2.5%	
Wheeler	7,471	56.6%	38.6%	0.4%	0.2%	0.0%	2.0%	2.2%	39.5%	3.6%	
White	28,003	90.2%	1.7%	0.5%	0.6%	0.0%	1.2%	5.8%	2.6%	3.3%	
Whitfield	102,864	63.3%	3.7%	2.0%	1.4%	0.0%	17.7%	11.9%	4.8%	35.9%	
Wilcox	8,766	59.9%	35.4%	0.0%	0.6%	0.0%	1.5%	2.6%	36.1%	3.1%	
Wilkes	9,565	52.8%	40.2%	0.4%	0.6%	0.0%	1.9%	4.1%	41.7%	4.2%	
Wilkinson	8,877	58.2%	35.8%	0.3%	0.3%	0.1%	1.3%	4.0%	37.5%	2.7%	
Worth	20,784	69.9%	25.4%	0.3%	0.4%	0.0%	0.8%	3.1%	26.5%	1.8%	

Esselstyn Report: Attachment D

Proposed Georgia Senate Districts

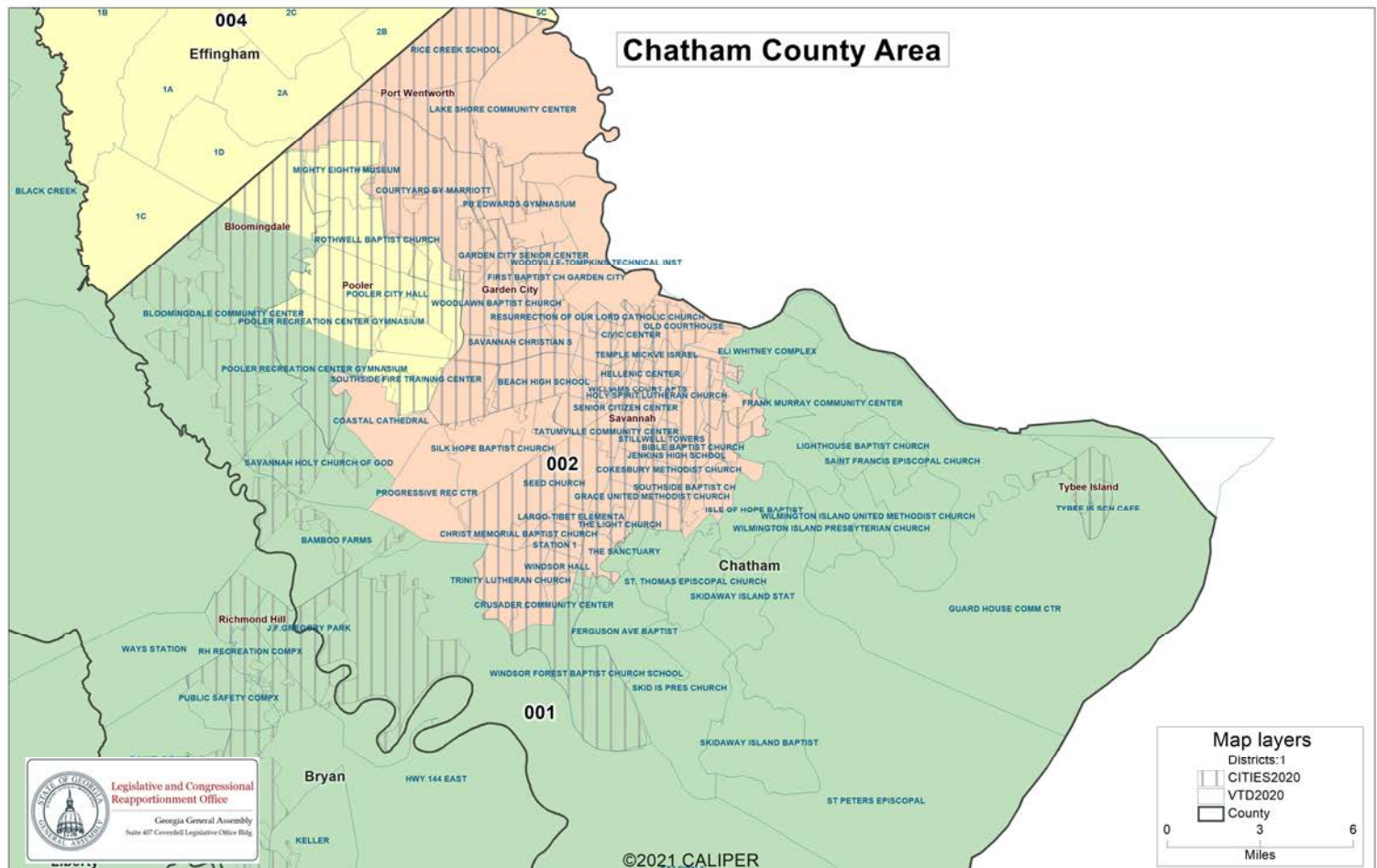
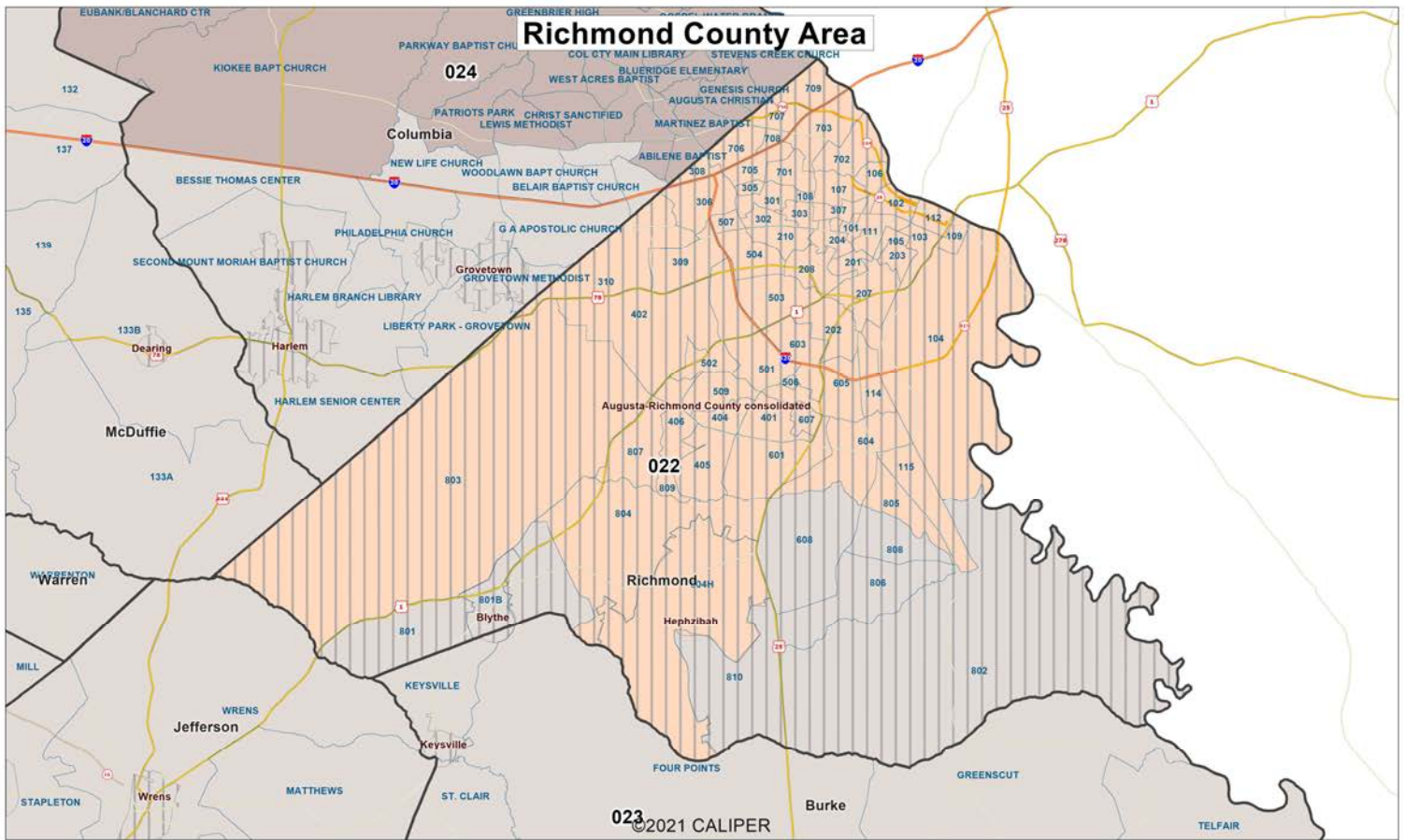


Metro Atlanta Area



Proposed Georgia Senate Districts

Client: S018
Plan: Senate-prop1-2021
Type: Senate



Legislative and Congressional
Reapportionment Office

Georgia General Assembly
Suite 607 Corvetto Legislative Office Bldg.

Map layers

Districts:1

CITIES2020

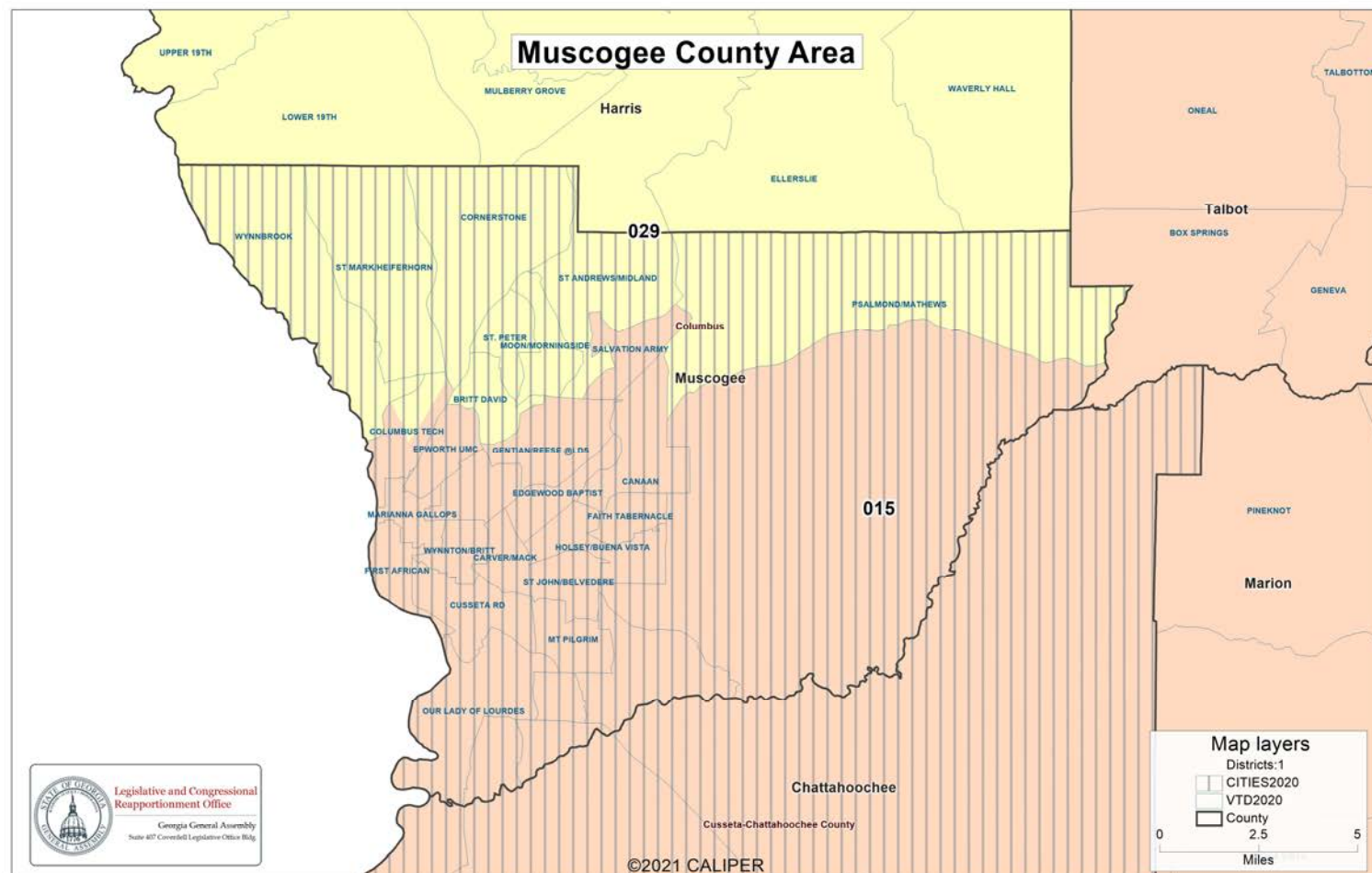
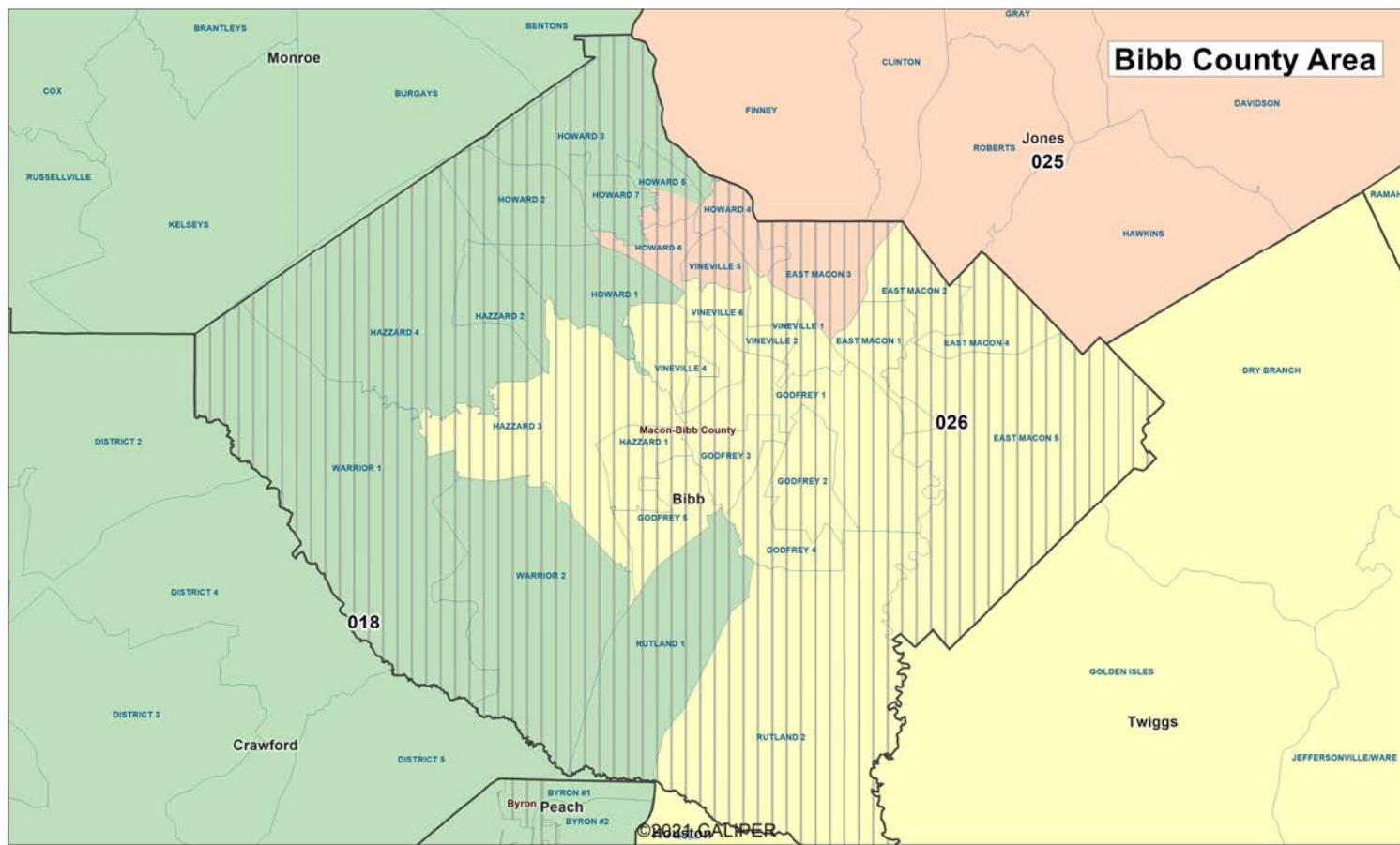
VTD2020

County

0 3 6
Miles

Proposed Georgia Senate Districts

Client: S018
Plan: Senate-prop1-2021
Type: Senate



User: S018

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: S018

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**

The preceding report, published by the Georgia General Assembly, does not include statistics for the percentage of the voting age population that is “Black or African American alone or in combination,” also known as the “any part Black voting age population” percentage or “APBVAP%.” As these percentages are relevant for determining which State Senate districts can be considered majority-Black under the conventions used in the expert report, I have provided them below after having exported a listing from the *Maptitude for Redistricting* software.

District	APBVAP%	District	APBVAP%	District	APBVAP%	District	APBVAP%
1	25.08%	15	54.00%	29	26.88%	43	64.33%
2	46.86%	16	22.70%	30	20.92%	44	71.34%
3	21.18%	17	32.01%	31	20.70%	45	18.58%
4	23.37%	18	30.40%	32	14.86%	46	16.90%
5	29.94%	19	25.72%	33	42.96%	47	17.42%
6	23.90%	20	31.28%	34	69.54%	48	9.47%
7	21.44%	21	7.46%	35	71.90%	49	7.96%
8	30.38%	22	56.50%	36	51.34%	50	5.61%
9	29.53%	23	35.48%	37	19.27%	51	1.21%
10	71.46%	24	19.85%	38	65.30%	52	13.04%
11	31.04%	25	33.48%	39	60.70%	53	5.10%
12	57.97%	26	56.99%	40	19.24%	54	3.79%
13	26.97%	27	5.00%	41	62.61%	55	65.97%
14	18.97%	28	19.51%	42	30.78%	56	7.57%

Esselstyn Report: Attachment E

District	Population	Deviation	% Deviation	% single-race			% single-race			% multi-racial (total pop)	% Hispanic or Latino (total pop)	% Black alone or in combination (total pop)	% Black alone or in combination (voting age pop)	
				American Indian	Alaska Native	% single-race White (total pop)	% single-race Black (total pop)	Pacific Islander	% single-race Asian (total pop)					% single-race Other (total pop)
1	191,402	118	0.06%	61.01%	24.27%	0.38%	2.69%	0.33%	3.22%	8.11%	8.78%	27.05%	25.08%	
2	190,408	-876	-0.46%	37.90%	48.03%	0.36%	3.44%	0.17%	4.31%	5.79%	8.36%	50.27%	46.86%	
3	191,212	-72	-0.04%	68.28%	21.28%	0.42%	1.25%	0.11%	2.73%	5.93%	6.82%	23.14%	21.18%	
4	191,098	-186	-0.10%	65.93%	22.86%	0.34%	1.88%	0.08%	2.94%	5.97%	6.49%	24.63%	23.37%	
5	191,921	637	0.33%	18.45%	27.57%	1.64%	11.06%	0.07%	27.36%	13.84%	45.48%	30.07%	29.94%	
6	191,834	550	0.29%	57.94%	21.00%	0.37%	7.36%	0.04%	4.82%	8.47%	9.84%	23.20%	22.95%	
7	189,709	-1,575	-0.82%	37.68%	20.56%	0.59%	21.74%	0.07%	9.04%	10.32%	18.57%	22.96%	21.44%	
8	192,396	1,112	0.58%	59.12%	30.35%	0.43%	1.24%	0.08%	3.29%	5.49%	7.28%	32.11%	30.38%	
9	192,915	1,631	0.85%	34.88%	29.00%	0.84%	14.04%	0.05%	10.88%	10.31%	21.09%	31.62%	29.53%	
10	192,601	1,317	0.69%	32.32%	59.43%	0.23%	1.03%	0.02%	2.00%	4.96%	4.20%	62.00%	61.10%	
11	189,976	-1,308	-0.68%	57.47%	31.30%	0.57%	0.71%	0.03%	5.24%	4.67%	9.36%	32.62%	31.04%	
12	190,819	-465	-0.24%	34.34%	59.08%	0.21%	0.88%	0.03%	2.56%	2.90%	3.89%	60.59%	57.97%	
13	194,905	3,621	1.89%	62.81%	27.41%	0.29%	1.19%	0.03%	3.72%	4.55%	7.10%	28.75%	27.24%	
14	192,533	1,249	0.65%	56.63%	17.15%	0.39%	9.49%	0.05%	6.50%	9.81%	13.97%	19.43%	18.97%	
15	189,446	-1,838	-0.96%	35.64%	52.99%	0.37%	1.35%	0.29%	3.34%	6.01%	7.57%	55.72%	54.00%	
16	190,077	-1,207	-0.63%	69.67%	19.46%	0.29%	2.53%	0.03%	2.09%	5.93%	5.29%	20.93%	19.72%	
17	193,838	2,554	1.34%	70.00%	21.64%	0.26%	0.94%	0.04%	2.25%	4.88%	4.73%	22.98%	21.77%	
18	192,680	1,396	0.73%	59.61%	29.57%	0.30%	2.27%	0.06%	2.50%	5.69%	5.47%	31.37%	30.04%	
19	192,316	1,032	0.54%	64.20%	25.16%	0.41%	0.60%	0.07%	4.94%	4.62%	9.72%	26.72%	25.72%	
20	194,919	3,635	1.90%	60.69%	32.35%	0.23%	1.01%	0.06%	1.82%	3.84%	3.81%	33.78%	32.45%	
21	192,572	1,288	0.67%	73.26%	6.66%	0.50%	7.41%	0.04%	3.93%	8.19%	10.13%	8.04%	7.46%	
22	188,930	-2,354	-1.23%	36.87%	50.98%	0.35%	2.31%	0.19%	2.78%	6.52%	6.88%	54.05%	50.84%	
23	188,095	-3,189	-1.67%	42.46%	51.48%	0.29%	0.61%	0.10%	1.42%	3.64%	3.04%	53.25%	51.06%	
24	194,277	2,993	1.56%	69.67%	17.49%	0.29%	3.58%	0.13%	1.95%	6.88%	5.61%	19.48%	18.38%	
25	192,708	1,424	0.74%	27.57%	58.22%	0.34%	3.61%	0.06%	3.89%	6.30%	8.14%	61.38%	58.93%	
26	190,535	-749	-0.39%	36.13%	54.05%	0.30%	1.92%	0.04%	2.93%	4.64%	5.41%	56.18%	52.84%	
27	190,676	-608	-0.32%	69.94%	4.43%	0.45%	11.44%	0.04%	4.92%	8.78%	11.61%	5.51%	5.00%	
28	189,696	-1,588	-0.83%	30.66%	56.20%	0.36%	2.24%	0.04%	4.70%	5.79%	8.95%	58.59%	57.28%	
29	189,424	-1,860	-0.97%	61.96%	26.49%	0.34%	3.05%	0.11%	2.15%	5.90%	5.34%	28.39%	26.88%	
30	191,939	655	0.34%	74.89%	14.88%	0.37%	0.83%	0.03%	3.07%	5.92%	6.15%	16.66%	15.77%	
31	192,755	1,471	0.77%	68.30%	19.22%	0.44%	1.07%	0.07%	4.02%	6.88%	8.60%	21.30%	19.61%	
32	192,448	1,164	0.61%	65.58%	13.56%	0.45%	5.53%	0.05%	5.09%	9.73%	12.09%	15.61%	14.86%	
33	192,694	1,410	0.74%	30.10%	41.18%	1.03%	2.16%	0.07%	14.18%	11.27%	26.72%	44.04%	42.96%	
34	192,023	739	0.39%	22.60%	57.52%	0.67%	4.16%	0.06%	8.70%	6.30%	14.36%	60.15%	58.97%	
35	193,194	1,910	1.00%	33.51%	52.94%	0.43%	1.33%	0.07%	4.93%	6.79%	9.56%	55.95%	54.05%	

District	Population	Deviation	% Deviation	% single-race White (total pop)	% single-race Black (total pop)	% single-race American Indian	% single-race Asian (total pop)	% single-race Native Hawaiian	% single-race Other (total pop)	% multi-racial (total pop)	% Hispanic or Latino (total pop)	% Black alone or in combination	% Black alone or in combination (voting age pop)
						Alaska Native (total pop)		Pacific Islander (total pop)				or in combination (total pop)	
36	192,282	998	0.52%	34.70%	51.92%	0.35%	3.62%	0.05%	3.23%	6.14%	7.56%	54.36%	51.34%
37	192,671	1,387	0.73%	64.32%	18.38%	0.38%	3.89%	0.04%	3.92%	9.08%	9.99%	20.86%	19.27%
38	190,605	-679	-0.36%	20.91%	64.48%	0.43%	3.34%	0.05%	4.86%	5.94%	9.12%	67.17%	66.36%
39	190,184	-1,100	-0.58%	26.93%	60.38%	0.30%	4.33%	0.05%	2.86%	5.16%	6.09%	62.78%	60.21%
40	190,544	-740	-0.39%	46.44%	16.84%	1.29%	10.90%	0.06%	14.32%	10.16%	24.81%	18.75%	19.24%
41	191,023	-261	-0.14%	19.86%	60.99%	0.44%	9.23%	0.02%	3.93%	5.54%	7.32%	63.74%	62.61%
42	190,153	-1,131	-0.59%	52.87%	26.90%	0.45%	6.95%	0.03%	4.97%	7.83%	10.21%	28.96%	29.09%
43	191,784	500	0.26%	30.42%	57.48%	0.33%	1.16%	0.11%	4.56%	5.95%	8.28%	60.40%	58.52%
44	188,256	-3,028	-1.58%	14.26%	69.94%	0.50%	4.23%	0.05%	5.60%	5.40%	9.71%	72.72%	71.52%
45	190,692	-592	-0.31%	55.41%	17.52%	0.47%	10.75%	0.04%	6.32%	9.49%	14.66%	19.69%	18.58%
46	190,312	-972	-0.51%	68.86%	16.88%	0.35%	3.81%	0.04%	3.65%	6.40%	7.99%	18.49%	16.90%
47	190,607	-677	-0.35%	66.86%	17.14%	0.41%	2.70%	0.05%	5.81%	7.04%	11.22%	18.64%	17.42%
48	190,123	-1,161	-0.61%	50.35%	8.51%	0.26%	30.63%	0.04%	2.69%	7.52%	7.58%	9.93%	9.47%
49	189,355	-1,929	-1.01%	65.60%	7.32%	0.80%	2.17%	0.05%	13.52%	10.54%	26.24%	8.50%	7.96%
50	189,320	-1,964	-1.03%	80.96%	5.13%	0.49%	1.23%	0.05%	5.21%	6.93%	11.08%	6.19%	5.61%
51	190,167	-1,117	-0.58%	89.94%	0.88%	0.51%	0.60%	0.03%	2.50%	5.55%	5.43%	1.49%	1.21%
52	190,799	-485	-0.25%	73.61%	12.56%	0.54%	1.09%	0.03%	5.02%	7.14%	10.11%	14.20%	13.04%
53	190,236	-1,048	-0.55%	86.66%	4.52%	0.38%	1.01%	0.07%	1.96%	5.40%	3.98%	5.74%	5.10%
54	192,443	1,159	0.61%	71.00%	3.13%	1.54%	1.16%	0.03%	13.21%	9.94%	26.66%	4.22%	3.79%
55	190,155	-1,129	-0.59%	19.41%	63.85%	0.45%	4.23%	0.06%	4.93%	7.08%	10.14%	67.34%	65.97%
56	191,226	-58	-0.03%	75.62%	6.50%	0.26%	5.69%	0.04%	2.88%	9.02%	8.63%	8.08%	7.57%

Esselstyn Report: Attachment F

2021 Committee Guidelines

I. HEARINGS AND MEETINGS

A. PUBLIC HEARINGS

1. A series of public hearings were held to actively seek public participation and input concerning the General Assembly's redrawing of congressional and legislative districts.
2. Video recordings of all hearings are and shall remain available on the legislative website, www.legis.ga.gov

B. COMMITTEE MEETINGS

1. All formal meetings of the full committee will be open to the public.
2. When the General Assembly is not in session, notices of all such meetings will be posted at the Offices of the Clerk of the House or Secretary of the Senate and other appropriate places at least 24 hours in advance of any meeting. Individual notices may be transmitted by email to any citizen or organization requesting the same without charge. Persons or organizations needing this information should contact the Senate Press Office or House Communications Office or the Secretary of the Senate or Clerk of the House to be placed on the notification list.
3. Minutes of all such meetings shall be kept and maintained in accordance with the rules of the House and Senate. Copies of the minutes should be made available in a timely manner at a reasonable cost in accordance with these same rules.

II. PUBLIC ACCESS TO REDISTRICTING DATA AND MATERIALS

- A. Census information databases on any medium created at public expense and held by the Committee or by the Legislative and Congressional Reapportionment Office for use in the redistricting process are included as public records and copies can be made available to the public in accordance with the rules of the General Assembly and subject to reasonable charges for search, retrieval, reproduction and other reasonable, related costs.
- B. Copies of the public records described above may be obtained at the cost of reproduction by members of the public on electronic media if the material exists on an appropriate electronic medium. Cost of reproduction may include not only the medium on which the copies made, but also the labor cost for the search, retrieval, and reproduction of the records and other reasonable, related costs.

- C. These guidelines regarding public access to redistricting data and materials do not apply to plans or other related materials prepared by or on behalf of an individual Member of the General Assembly using the Legislative and Congressional Reapportionment Office, where those plans and materials have not been made public through presentation to the Committee.

III. REDISTRICTING PLANS

A. GENERAL PRINCIPLES FOR DRAFTING PLANS

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
 - a. The boundaries of counties and precincts;
 - b. Compactness; and
 - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

B. PLANS PRODUCED THROUGH THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. Staff of the Legislative and Congressional Reapportionment Office will be available to all members of the General Assembly requesting assistance in accordance with the policy of that office.
2. Census data and redistricting work maps will be available to all members of the General Assembly upon request, provided that (a) the map was created by the requesting member, (b) the map is publicly available, or (c) the Legislative and Congressional Reapportionment Office has been granted permission by the author of the map to share a copy with the requesting member.
3. As noted above, redistricting plans and other records related to the provision of staff services to individual members of the General Assembly will not be subject to public disclosure. Only the author of a particular map may waive the confidentiality of his or her own work product. This confidentiality provision will not apply with respect to records related to the provision of staff services to any committee or subcommittee as a whole or to any records which are or have been previously disclosed by or pursuant to the direction of an individual member of the General Assembly.

C. PLANS PRODUCED OUTSIDE OF THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. All plans submitted to the Committee will be made part of the public record and made available in the same manner as other committee public records.
2. All plans prepared outside the Legislative and Congressional Reapportionment Office must be submitted to that office prior to presentation to the Committee by a Member of the General Assembly for technical verification and presentation and bill preparation. All pieces of census geography must be accounted for in some district.
3. The electronic submission of material for technical verification must be made in accordance with the following requirements or in a manner specifically approved and accepted by the Legislative and Congressional Reapportionment Office.
 - a. The submission shall be in electronic format with accompanying documentation that shows the submitting sponsor of the proposed plan and contact person for the proposed plan, including email address and telephone number.

- b. An electronic map image that clearly depicts defined boundaries, utilizing the 2020 United States Census geographic boundaries, and a block equivalency file containing two columns. The first column shall list the 15-digit census block identification numbers, and the second column shall list the three-digit district identification number. Both block and district numbers shall be zero-filled text files. Such files shall be submitted in .xis, .xlsx, .dbf, .txt, or .csv file formats. The following is a sample:

```
BlockID, DISTRICT
"13001950100101","008"
"13001950100102","008"
"13001950100103","008"
"13001950100104","008"
"13001950100105","008"
"13001950100106","008"
```

- 4. If submission of the plan cannot be done electronically, the following requirements must be followed:
 - a. All drafts, amendments, or revisions should be on clearly-depicted maps that follow the 2020 Census geographic boundaries and should be accompanied by a statistical sheet listing the Census geography including the total population for each district.
 - b. All plans submitted should either be a complete statewide plan or fit back into the plan that they modified, so that the proposal can be evaluated in the context of a statewide plan. All pieces of Census geography must be accounted for in some district.

D. GENERAL GUIDELINES FOR PRESENTATION OF ALL PLANS

- 1. A redistricting plan may be presented for consideration by the Committee only through the sponsorship of one or more Member(s) of the General Assembly. All such drafts of and amendments or revisions to plans presented at any committee meeting must be on clearly-depicted maps which follow the 2020 Census geographic boundaries and accompanied by a statistical sheet listing the Census geography, including the total population and minority populations for each proposed district.
- 2. No plan may be presented to the Committee unless that plan makes accommodations for and fits back into a specific, identified statewide map for the particular legislative body involved.

3. All plans presented at committee meetings will be made available for inspection by the public either electronically or by hard copy available at the Office of Legislative and Congressional Reapportionment.
- E. These guidelines may be reconsidered or amended by the Committee.

Esselstyn Report: Attachment G

Explanation of compactness measures

The following explanations of the five measures of compactness considered in the report are taken from the documentation that accompanies *Maptitude for Redistricting*, the software that was used to generate the compactness scores.

The **Reock** test is an area-based measure that compares each district to a circle, which is considered to be the most compact shape possible. For each district, the Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district. The measure is always between 0 and 1, with 1 being the most compact.

The **Schwartzberg** test is a perimeter-based measure that compares a simplified version of each district to a circle, which is considered to be the most compact shape possible. [...] For each district, the Schwartzberg test computes the ratio of the perimeter of the simplified version of the district to the perimeter of a circle with the same area as the original district. [...] This measure is usually greater than or equal to 1, with 1 being the most compact.

The **Polsby-Popper** test computes the ratio of the district area to the area of a circle with the same perimeter: $4\pi\text{Area}/(\text{Perimeter}^2)$. The measure is always between 0 and 1, with 1 being the most compact.

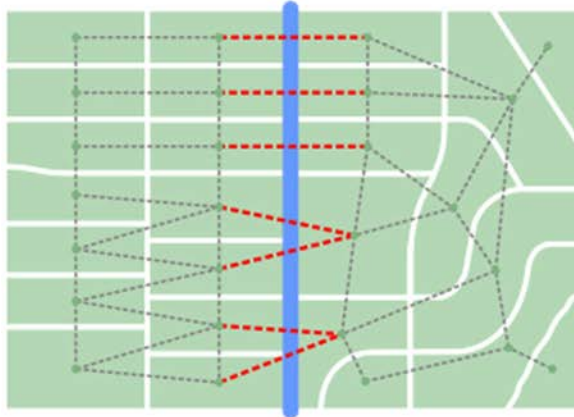
The **Area/Convex Hull** test computes the ratio the district area to the area of the convex hull of the district (minimum convex polygon which completely contains the district). The measure is always between 0 and 1, with 1 being the most compact.

The **Cut Edges** test counts the number of edges removed (“cut”) from the adjacency (dual) graph of the base layer to define the districting plan. The adjacency

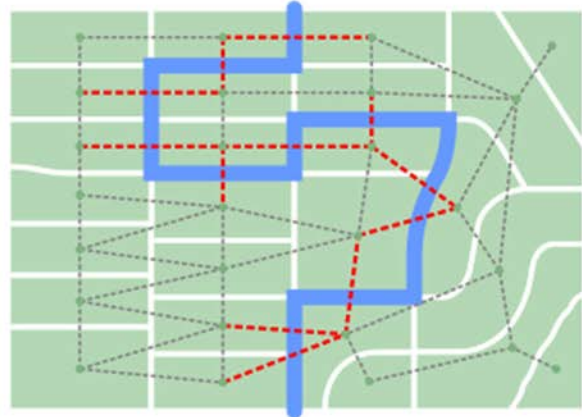
graph is defined by creating a node for each base layer area. An edge is added between two nodes if the two corresponding base layer areas are adjacent: i.e., share a common linear boundary. If such a boundary forms part of the district boundary then its corresponding edge is cut by the plan. The measure is a single number for the plan. A smaller number implies a more compact plan.

Explanatory graphic for the Cut Edges test (from same source):

This district boundary cuts 7 edges:



This district boundary cuts 12 edges:



Esselstyn Report: Attachment H

More detailed tables for comparative characteristics of State Senate plans

Population Deviation:

The deviation statistics for each individual district in the respective plans can be found in **Attachment D** and **Attachment E**. Below are the summary statistics generated by the *Maptitude for Redistricting* software.

Enacted plan:

Population Range:	189,320 to 193,163
Ratio Range:	0.02
Absolute Range:	
Absolute Overall Range:	
Relative Range:	-1,964 to 1,879
Relative Overall Range:	3,843
Absolute Mean Deviation:	-1.03% to 0.98%
Relative Mean Deviation:	2.01%
Standard Deviation:	1,012.61
	0.53%

Illustrative plan:

Population Range:	
Ratio Range:	
Absolute Range:	188,095 to 194,919
Absolute Overall Range:	0.04
Relative Range:	-3,189 to 3,635
Relative Overall Range:	6,824
Absolute Mean Deviation:	-1.67% to 1.90%
Relative Mean Deviation:	3.57%
Standard Deviation:	1,283.86
	0.67%
	1,529.53

Compactness:

Below is the compactness report for the Senate enacted plan.

User:

Plan Name: GA Sen 000

Plan Type: Reference

Measures of Compactness Report

Thursday, January 13, 2022

1:11 PM

Number of cut edges: 11,005

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.17	1.31	0.13	0.50
Max	0.68	2.67	0.50	0.92
Mean	0.42	1.75	0.29	0.76
Std. Dev.	0.11	0.25	0.08	0.08

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
1	0.49	1.60	0.31	0.79
2	0.47	1.80	0.22	0.73
3	0.39	1.70	0.21	0.70
4	0.47	1.64	0.27	0.75
5	0.17	2.10	0.21	0.65
6	0.41	1.94	0.24	0.70
7	0.35	1.66	0.34	0.79
8	0.45	1.77	0.23	0.73
9	0.24	2.06	0.21	0.69
10	0.28	1.98	0.23	0.69
11	0.36	1.57	0.33	0.79

Measures of Compactness Report

GA Sen 000

Number of cut edges: 11,005

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.17	1.31	0.13	0.50
Max	0.68	2.67	0.50	0.92
Mean	0.42	1.75	0.29	0.76
Std. Dev.	0.11	0.25	0.08	0.08
District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
12	0.62	1.46	0.39	0.86
13	0.45	1.72	0.26	0.73
14	0.27	1.90	0.24	0.66
15	0.57	1.52	0.32	0.83
16	0.37	1.55	0.31	0.77
17	0.35	2.22	0.17	0.63
18	0.47	1.85	0.21	0.76
19	0.53	1.47	0.37	0.84
20	0.41	1.50	0.36	0.80
21	0.42	1.56	0.33	0.83
22	0.41	1.68	0.29	0.75
23	0.37	1.93	0.16	0.70
24	0.37	1.89	0.21	0.68
25	0.39	1.81	0.24	0.73

Measures of Compactness Report

GA Sen 000

Number of cut edges: 11,005

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.17	1.31	0.13	0.50
Max	0.68	2.67	0.50	0.92
Mean	0.42	1.75	0.29	0.76
Std. Dev.	0.11	0.25	0.08	0.08

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
26	0.47	1.90	0.20	0.68
27	0.50	1.37	0.46	0.88
28	0.45	1.79	0.25	0.69
29	0.58	1.37	0.42	0.88
30	0.60	1.51	0.41	0.87
31	0.37	1.58	0.38	0.84
32	0.29	1.98	0.21	0.64
33	0.40	1.96	0.22	0.72
34	0.45	1.60	0.34	0.74
35	0.47	1.78	0.26	0.83
36	0.32	1.76	0.30	0.76
37	0.49	1.51	0.37	0.80
38	0.36	2.01	0.21	0.76
39	0.17	2.67	0.13	0.50

Measures of Compactness Report

GA Sen 000

Number of cut edges: 11,005

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.17	1.31	0.13	0.50
Max	0.68	2.67	0.50	0.92
Mean	0.42	1.75	0.29	0.76
Std. Dev.	0.11	0.25	0.08	0.08
District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
40	0.51	1.65	0.34	0.78
41	0.51	1.78	0.30	0.74
42	0.48	1.73	0.32	0.82
43	0.64	1.56	0.35	0.85
44	0.18	2.12	0.19	0.68
45	0.35	1.72	0.30	0.73
46	0.37	1.99	0.21	0.72
47	0.36	2.06	0.19	0.66
48	0.35	1.61	0.34	0.79
49	0.46	1.55	0.34	0.79
50	0.45	1.79	0.23	0.72
51	0.68	1.31	0.50	0.92
52	0.47	1.80	0.25	0.72
53	0.49	1.48	0.40	0.90

Measures of Compactness Report

GA Sen 000

Number of cut edges: 11,005

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.17	1.31	0.13	0.50
Max	0.68	2.67	0.50	0.92
Mean	0.42	1.75	0.29	0.76
Std. Dev.	0.11	0.25	0.08	0.08
District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
54	0.60	1.38	0.44	0.83
55	0.34	1.84	0.27	0.81
56	0.38	1.70	0.30	0.80

Measures of Compactness Report

GA Sen 000

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Schwartzberg	The measure is usually greater than or equal to 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.
Cut Edges	A smaller number implies a more compact plan. The measure should only be used to compare plans defined on the same base layer.

Below is the compactness report for the Senate illustrative plan.

User:

Plan Name: GA Senate Illustrative

Plan Type: Reference

Measures of Compactness Report

Saturday, December 3, 2022

2:09 PM

Number of cut edges: 11,003

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.17	1.31	0.13	0.52
Max	0.68	2.67	0.50	0.92
Mean	0.41	1.76	0.28	0.75
Std. Dev.	0.11	0.26	0.09	0.08

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
1	0.49	1.60	0.31	0.79
2	0.47	1.80	0.22	0.73
3	0.39	1.70	0.21	0.70
4	0.47	1.64	0.27	0.75
5	0.17	2.10	0.21	0.65
6	0.42	1.95	0.23	0.71
7	0.35	1.66	0.34	0.79
8	0.45	1.77	0.23	0.73
9	0.24	2.06	0.21	0.69
10	0.25	2.08	0.19	0.68
11	0.36	1.57	0.33	0.79

Measures of Compactness Report

GA Senate Illustrative

Number of cut edges: 11,003

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.17	1.31	0.13	0.52
Max	0.68	2.67	0.50	0.92
Mean	0.41	1.76	0.28	0.75
Std. Dev.	0.11	0.26	0.09	0.08

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
12	0.62	1.46	0.39	0.86
13	0.48	1.70	0.25	0.76
14	0.27	1.90	0.24	0.66
15	0.57	1.52	0.32	0.83
16	0.39	1.76	0.27	0.71
17	0.35	2.21	0.16	0.60
18	0.38	1.91	0.20	0.66
19	0.53	1.47	0.37	0.84
20	0.28	1.83	0.24	0.71
21	0.42	1.56	0.33	0.83
22	0.33	1.70	0.32	0.74
23	0.34	1.93	0.17	0.69
24	0.27	1.87	0.23	0.72
25	0.57	1.55	0.34	0.80

Measures of Compactness Report

GA Senate Illustrative

Number of cut edges: 11,003

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.17	1.31	0.13	0.52
Max	0.68	2.67	0.50	0.92
Mean	0.41	1.76	0.28	0.75
Std. Dev.	0.11	0.26	0.09	0.08

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
26	0.44	1.56	0.25	0.77
27	0.50	1.37	0.46	0.88
28	0.38	2.17	0.19	0.66
29	0.58	1.37	0.42	0.88
30	0.41	1.55	0.38	0.84
31	0.40	1.43	0.46	0.86
32	0.29	1.98	0.21	0.64
33	0.40	1.96	0.22	0.72
34	0.31	1.98	0.21	0.66
35	0.59	1.48	0.42	0.86
36	0.32	1.76	0.30	0.76
37	0.49	1.51	0.37	0.80
38	0.37	2.05	0.20	0.75
39	0.18	2.67	0.13	0.52

Measures of Compactness Report

GA Senate Illustrative

Number of cut edges: 11,003

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.17	1.31	0.13	0.52
Max	0.68	2.67	0.50	0.92
Mean	0.41	1.76	0.28	0.75
Std. Dev.	0.11	0.26	0.09	0.08

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
40	0.51	1.65	0.34	0.78
41	0.51	1.78	0.30	0.74
42	0.47	1.96	0.25	0.78
43	0.49	1.82	0.25	0.79
44	0.33	1.95	0.24	0.72
45	0.35	1.72	0.30	0.73
46	0.37	1.99	0.21	0.72
47	0.36	2.06	0.19	0.66
48	0.35	1.61	0.34	0.79
49	0.46	1.55	0.34	0.79
50	0.45	1.79	0.23	0.72
51	0.68	1.31	0.50	0.92
52	0.47	1.80	0.25	0.72
53	0.49	1.48	0.40	0.90

Measures of Compactness Report

GA Senate Illustrative

Number of cut edges: 11,003

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.17	1.31	0.13	0.52
Max	0.68	2.67	0.50	0.92
Mean	0.41	1.76	0.28	0.75
Std. Dev.	0.11	0.26	0.09	0.08
District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
54	0.60	1.38	0.44	0.83
55	0.34	1.84	0.27	0.81
56	0.38	1.70	0.30	0.80

Measures of Compactness Report

GA Senate Illustrative

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Schwartzberg	The measure is usually greater than or equal to 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.
Cut Edges	A smaller number implies a more compact plan. The measure should only be used to compare plans defined on the same base layer.

Divisions of counties and precincts (VTDs):

Below is the political subdivisions splits report for the Senate enacted plan.

User:

Plan Name: **GA Senate Enacted**Plan Type: **Reference**

Political Subdivision Splits Between Districts

Saturday, December 3, 2022

3:21 PM

Number of subdivisions not split:

County	130
Voting District	2,651

Number of subdivisions split into more than one district:

County	29
Voting District	47

Number of splits involving no population:

County	0
Voting District	8

Split Counts

County

Cases where an area is split among 2 Districts: 18

Cases where an area is split among 3 Districts: 7

Cases where an area is split among 6 Districts: 1

Cases where an area is split among 7 Districts: 1

Cases where an area is split among 9 Districts: 1

Cases where an area is split among 10 Districts: 1

Voting District

Cases where an area is split among 2 Districts: 46

Cases where an area is split among 3 Districts: 1

County	Voting District	District	Population
<i>Split Counties:</i>			
Barrow GA		45	39,217
Barrow GA		46	17,116
Barrow GA		47	27,172
Bartow GA		37	11,130
Bartow GA		52	97,771
Bibb GA		18	53,182
Bibb GA		25	15,513
Bibb GA		26	88,651
Chatham GA		1	81,408
Chatham GA		2	190,408
Chatham GA		4	23,475
Cherokee GA		21	109,034
Cherokee GA		32	90,981
Cherokee GA		56	66,605
Clarke GA		46	52,016
Clarke GA		47	76,655
Clayton GA		34	158,608
Clayton GA		44	138,987
Cobb GA		6	92,249

Political Subdivision Splits Between Districts

GA Senate Enacted

County	Voting District	District	Population
Cobb GA		32	101,467
Cobb GA		33	192,694
Cobb GA		37	181,541
Cobb GA		38	108,305
Cobb GA		56	89,893
Coffee GA		13	19,881
Coffee GA		19	23,211
Columbia GA		23	59,796
Columbia GA		24	96,214
DeKalb GA		10	75,906
DeKalb GA		40	164,997
DeKalb GA		41	183,560
DeKalb GA		42	190,940
DeKalb GA		43	32,212
DeKalb GA		44	51,049
DeKalb GA		55	65,718
Douglas GA		28	25,889
Douglas GA		30	23,454
Douglas GA		35	94,894
Fayette GA		16	87,134
Fayette GA		34	32,060
Floyd GA		52	85,090
Floyd GA		53	13,494
Forsyth GA		27	190,676
Forsyth GA		48	60,607
Fulton GA		6	99,152
Fulton GA		14	192,533
Fulton GA		21	83,538
Fulton GA		28	6,963
Fulton GA		35	97,945
Fulton GA		36	192,282
Fulton GA		38	84,850
Fulton GA		39	191,500
Fulton GA		48	83,219
Fulton GA		56	34,728
Gordon GA		52	7,938
Gordon GA		54	49,606
Gwinnett GA		5	191,921
Gwinnett GA		7	189,709
Gwinnett GA		9	192,915
Gwinnett GA		40	25,547
Gwinnett GA		41	7,463
Gwinnett GA		45	151,475
Gwinnett GA		46	27,298
Gwinnett GA		48	46,297
Gwinnett GA		55	124,437
Hall GA		49	189,355

Political Subdivision Splits Between Districts

GA Senate Enacted

County	Voting District	District	Population
Hall GA		50	13,781
Henry GA		10	116,992
Henry GA		17	82,287
Henry GA		25	41,433
Houston GA		18	42,875
Houston GA		20	74,275
Houston GA		26	46,483
Jackson GA		47	56,660
Jackson GA		50	19,247
Muscogee GA		15	142,205
Muscogee GA		29	64,717
Newton GA		17	45,536
Newton GA		43	66,947
Paulding GA		30	18,954
Paulding GA		31	149,707
Richmond GA		22	193,163
Richmond GA		23	13,444
Walton GA		17	44,590
Walton GA		46	52,083
Ware GA		3	10,431
Ware GA		8	25,820
White GA		50	12,642
White GA		51	15,361
<i>Split VTDs:</i>			
Bibb GA	HOWARD 1	18	5,912
Bibb GA	HOWARD 1	25	31
Bibb GA	HOWARD 2	18	5,445
Bibb GA	HOWARD 2	25	0
Bibb GA	HOWARD 3	18	12,640
Bibb GA	HOWARD 3	25	14
Bibb GA	HOWARD 5	18	267
Bibb GA	HOWARD 5	25	2,103
Chatham GA	BLOOMINGDALE COMMUNITY CENTER	1	4,099
Chatham GA	BLOOMINGDALE COMMUNITY CENTER	4	755
Chatham GA	POOLER CHRURCH	1	5,330
Chatham GA	POOLER CHRURCH	4	4,407
Clarke GA	3B	46	5,752
Clarke GA	3B	47	4,194
Clarke GA	6C	46	2,971
Clarke GA	6C	47	2,036
Cobb GA	Dobbins 01	6	6,586
Cobb GA	Dobbins 01	33	6,310
Cobb GA	Dobbins 01	38	505
Cobb GA	Elizabeth 01	32	3,771
Cobb GA	Elizabeth 01	37	2,099

Political Subdivision Splits Between Districts

GA Senate Enacted

County	Voting District	District	Population
Cobb GA	Kennesaw 1A	32	1,471
Cobb GA	Kennesaw 1A	37	2,972
Cobb GA	Marietta 3A	32	3,439
Cobb GA	Marietta 3A	33	5,460
Cobb GA	Marietta 5A	6	0
Cobb GA	Marietta 5A	33	4,334
Cobb GA	Marietta 6A	6	3,022
Cobb GA	Marietta 6A	32	1,532
Cobb GA	Marietta 7A	6	993
Cobb GA	Marietta 7A	33	5,918
Cobb GA	Nickajack 01	6	2,398
Cobb GA	Nickajack 01	38	3,728
Cobb GA	Norton Park 01	33	7,049
Cobb GA	Norton Park 01	38	752
Cobb GA	Oregon 03	33	12,988
Cobb GA	Oregon 03	37	0
Cobb GA	Powers Ferry 01	6	4,963
Cobb GA	Powers Ferry 01	33	464
Cobb GA	Sewell Mill 03	6	5,051
Cobb GA	Sewell Mill 03	33	1,886
Cobb GA	Vinings 02	6	4,624
Cobb GA	Vinings 02	38	5,019
Coffee GA	DOUGLAS	13	12,595
Coffee GA	DOUGLAS	19	15,976
Floyd GA	GARDEN LAKES	52	1,024
Floyd GA	GARDEN LAKES	53	7,817
Forsyth GA	BIG CREEK	27	15,216
Forsyth GA	BIG CREEK	48	10,302
Forsyth GA	POLO	27	24,894
Forsyth GA	POLO	48	964
Fulton GA	RW09	21	2,971
Fulton GA	RW09	56	4,750
Fulton GA	RW12	21	4,274
Fulton GA	RW12	56	3,958
Fulton GA	SC08B	35	223
Fulton GA	SC08B	39	5,124
Fulton GA	SC18C	35	1,852
Fulton GA	SC18C	39	521
Gordon GA	LILY POND	52	1,641
Gordon GA	LILY POND	54	996
Gwinnett GA	DACULA	45	2,699
Gwinnett GA	DACULA	46	4,613
Gwinnett GA	LAWRENCEVILLE E	5	2,075
Gwinnett GA	LAWRENCEVILLE E	9	1,386
Gwinnett GA	PINCKNEYVILLE W	5	5,605
Gwinnett GA	PINCKNEYVILLE W	7	2,701
Hall GA	GLADE	49	5,135

Political Subdivision Splits Between Districts

GA Senate Enacted

County	Voting District	District	Population
Hall GA	GLADE	50	1,735
Hall GA	TADMORE	49	4,129
Hall GA	TADMORE	50	10,220
Houston GA	FMMS	18	5,178
Houston GA	FMMS	20	8,151
Houston GA	MCMS	18	3,625
Houston GA	MCMS	20	9,869
Houston GA	RECR	20	0
Houston GA	RECR	26	17,798
Jackson GA	Central Jackson	47	24,383
Jackson GA	Central Jackson	50	0
Jackson GA	North Jackson	47	0
Jackson GA	North Jackson	50	19,247
Muscogee GA	COLUMBUS TECH	15	6,919
Muscogee GA	COLUMBUS TECH	29	2,228
Paulding GA	CARL SCOGGINS MID SC	30	7,586
Paulding GA	CARL SCOGGINS MID SC	31	2,162
Paulding GA	TAYLOR FARM PARK	30	475
Paulding GA	TAYLOR FARM PARK	31	12,958
Ware GA	100	3	2,672
Ware GA	100	8	3,692
Ware GA	200A	3	0
Ware GA	200A	8	4,133
Ware GA	304	3	0
Ware GA	304	8	2,107
Ware GA	400	3	4,626
Ware GA	400	8	406

Below is the political subdivisions splits report for the Senate illustrative plan.

User:

Plan Name: **GA Senate Illustrative**Plan Type: **Reference**

Political Subdivision Splits Between Districts

Saturday, December 3, 2022

3:10 PM

Number of subdivisions not split:

County	125
Voting District	2,649

Number of subdivisions split into more than one district:

County	34
Voting District	49

Number of splits involving no population:

County	0
Voting District	7

Split Counts

County

Cases where an area is split among 2 Districts: 22

Cases where an area is split among 3 Districts: 7

Cases where an area is split among 4 Districts: 1

Cases where an area is split among 6 Districts: 1

Cases where an area is split among 7 Districts: 1

Cases where an area is split among 9 Districts: 1

Cases where an area is split among 10 Districts: 1

Voting District

Cases where an area is split among 2 Districts: 48

Cases where an area is split among 3 Districts: 1

County	Voting District	District	Population
<i>Split Counties:</i>			
Baldwin GA		17	16,966
Baldwin GA		23	26,833
Barrow GA		45	39,217
Barrow GA		46	17,116
Barrow GA		47	27,172
Bartow GA		37	11,130
Bartow GA		52	97,771
Chatham GA		1	81,408
Chatham GA		2	190,408
Chatham GA		4	23,475
Cherokee GA		21	109,034
Cherokee GA		32	90,981
Cherokee GA		56	66,605
Clarke GA		46	52,016
Clarke GA		47	76,655
Clayton GA		25	37,295
Clayton GA		28	19,071
Clayton GA		34	135,995

Political Subdivision Splits Between Districts

GA Senate Illustrative

County	Voting District	District	Population
Clayton GA		44	105,234
Cobb GA		6	97,590
Cobb GA		32	101,467
Cobb GA		33	192,694
Cobb GA		37	181,541
Cobb GA		38	102,964
Cobb GA		56	89,893
Coffee GA		13	19,881
Coffee GA		19	23,211
Columbia GA		22	30,174
Columbia GA		24	125,836
Coweta GA		16	39,894
Coweta GA		28	74,804
Coweta GA		30	31,460
DeKalb GA		10	82,066
DeKalb GA		40	164,997
DeKalb GA		41	183,560
DeKalb GA		42	190,153
DeKalb GA		43	17,660
DeKalb GA		44	60,228
DeKalb GA		55	65,718
Fayette GA		16	45,488
Fayette GA		28	17,678
Fayette GA		34	56,028
Floyd GA		52	85,090
Floyd GA		53	13,494
Forsyth GA		27	190,676
Forsyth GA		48	60,607
Fulton GA		6	94,244
Fulton GA		14	192,533
Fulton GA		21	83,538
Fulton GA		28	78,143
Fulton GA		35	30,198
Fulton GA		36	192,282
Fulton GA		38	87,641
Fulton GA		39	190,184
Fulton GA		48	83,219
Fulton GA		56	34,728
Gordon GA		52	7,938
Gordon GA		54	49,606
Greene GA		17	14,168
Greene GA		23	4,747
Gwinnett GA		5	191,921
Gwinnett GA		7	189,709
Gwinnett GA		9	192,915
Gwinnett GA		40	25,547
Gwinnett GA		41	7,463

Political Subdivision Splits Between Districts

GA Senate Illustrative

County	Voting District	District	Population
Gwinnett GA		45	151,475
Gwinnett GA		46	27,298
Gwinnett GA		48	46,297
Gwinnett GA		55	124,437
Hall GA		49	189,355
Hall GA		50	13,781
Henry GA		10	62,505
Henry GA		25	155,413
Henry GA		44	22,794
Houston GA		18	96,912
Houston GA		20	33,532
Houston GA		26	33,189
Jackson GA		47	56,660
Jackson GA		50	19,247
McDuffie GA		23	12,164
McDuffie GA		24	9,468
Muscogee GA		15	142,205
Muscogee GA		29	64,717
Newton GA		17	9,333
Newton GA		43	103,150
Paulding GA		31	149,902
Paulding GA		35	18,759
Richmond GA		22	158,756
Richmond GA		23	47,851
Rockdale GA		10	22,596
Rockdale GA		43	70,974
Walton GA		17	44,590
Walton GA		46	52,083
Ware GA		3	10,431
Ware GA		8	25,820
White GA		50	12,642
White GA		51	15,361
Wilcox GA		13	5,579
Wilcox GA		20	3,187
Wilkes GA		23	3,747
Wilkes GA		24	5,818
<i>Split VTDs:</i>			
Baldwin GA	NORTH MILLEDGEVILLE	17	2,373
Baldwin GA	NORTH MILLEDGEVILLE	23	991
Baldwin GA	SOUTH MILLEDGEVILLE	17	1,215
Baldwin GA	SOUTH MILLEDGEVILLE	23	2,491
Chatham GA	BLOOMINGDALE	1	4,099
	COMMUNITY CENTER		
Chatham GA	BLOOMINGDALE	4	755
	COMMUNITY CENTER		
Chatham GA	POOLER CHRURCH	1	5,330
Chatham GA	POOLER CHRURCH	4	4,407

Political Subdivision Splits Between Districts

GA Senate Illustrative

County	Voting District	District	Population
Clarke GA	3B	46	5,752
Clarke GA	3B	47	4,194
Clarke GA	6C	46	2,971
Clarke GA	6C	47	2,036
Cobb GA	Dobbins 01	6	6,586
Cobb GA	Dobbins 01	33	6,310
Cobb GA	Dobbins 01	38	505
Cobb GA	Elizabeth 01	32	3,771
Cobb GA	Elizabeth 01	37	2,099
Cobb GA	Kennesaw 1A	32	1,471
Cobb GA	Kennesaw 1A	37	2,972
Cobb GA	Marietta 3A	32	3,439
Cobb GA	Marietta 3A	33	5,460
Cobb GA	Marietta 5A	6	0
Cobb GA	Marietta 5A	33	4,334
Cobb GA	Marietta 6A	6	3,022
Cobb GA	Marietta 6A	32	1,532
Cobb GA	Marietta 7A	6	993
Cobb GA	Marietta 7A	33	5,918
Cobb GA	Nickajack 01	6	2,398
Cobb GA	Nickajack 01	38	3,728
Cobb GA	Norton Park 01	33	7,049
Cobb GA	Norton Park 01	38	752
Cobb GA	Oregon 03	33	12,988
Cobb GA	Oregon 03	37	0
Cobb GA	Powers Ferry 01	6	4,963
Cobb GA	Powers Ferry 01	33	464
Cobb GA	Sewell Mill 03	6	5,051
Cobb GA	Sewell Mill 03	33	1,886
Cobb GA	Smyrna 1A	6	5,341
Cobb GA	Smyrna 1A	38	1,292
Cobb GA	Vinings 02	6	4,624
Cobb GA	Vinings 02	38	5,019
Coffee GA	DOUGLAS	13	12,595
Coffee GA	DOUGLAS	19	15,976
DeKalb GA	Flakes Mill Fire Station	10	2,263
DeKalb GA	Flakes Mill Fire Station	44	396
DeKalb GA	Harris - Narvie J. Harris Elem	10	3,339
DeKalb GA	Harris - Narvie J. Harris Elem	44	1,682
Floyd GA	GARDEN LAKES	52	1,024
Floyd GA	GARDEN LAKES	53	7,817
Forsyth GA	BIG CREEK	27	15,216
Forsyth GA	BIG CREEK	48	10,302
Forsyth GA	POLO	27	24,894
Forsyth GA	POLO	48	964

Political Subdivision Splits Between Districts

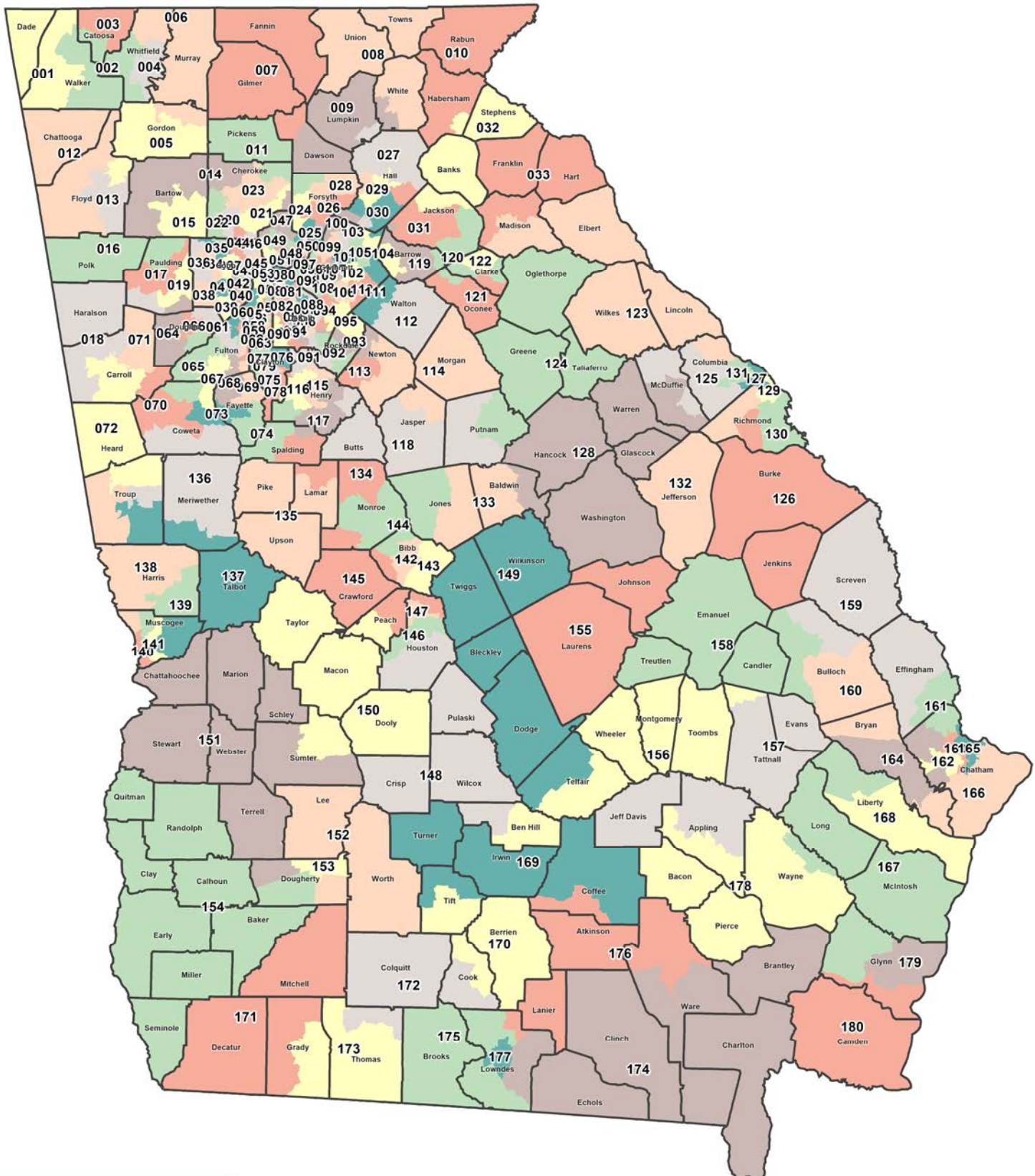
GA Senate Illustrative

County	Voting District	District	Population
Fulton GA	RW09	21	2,971
Fulton GA	RW09	56	4,750
Fulton GA	RW12	21	4,274
Fulton GA	RW12	56	3,958
Fulton GA	SC05A	28	681
Fulton GA	SC05A	35	317
Fulton GA	SC08B	28	223
Fulton GA	SC08B	39	5,124
Fulton GA	SC13	28	15
Fulton GA	SC13	35	4,019
Fulton GA	SC18C	35	1,852
Fulton GA	SC18C	39	521
Gordon GA	LILY POND	52	1,641
Gordon GA	LILY POND	54	996
Gwinnett GA	DACULA	45	2,699
Gwinnett GA	DACULA	46	4,613
Gwinnett GA	LAWRENCEVILLE E	5	2,075
Gwinnett GA	LAWRENCEVILLE E	9	1,386
Gwinnett GA	PINCKNEYVILLE W	5	5,605
Gwinnett GA	PINCKNEYVILLE W	7	2,701
Hall GA	GLADE	49	5,135
Hall GA	GLADE	50	1,735
Hall GA	TADMORE	49	4,129
Hall GA	TADMORE	50	10,220
Houston GA	RECR	20	0
Houston GA	RECR	26	17,798
Jackson GA	Central Jackson	47	24,383
Jackson GA	Central Jackson	50	0
Jackson GA	North Jackson	47	0
Jackson GA	North Jackson	50	19,247
Muscogee GA	COLUMBUS TECH	15	6,919
Muscogee GA	COLUMBUS TECH	29	2,228
Paulding GA	AUSTIN MIDDLE SCHOOL	31	971
Paulding GA	AUSTIN MIDDLE SCHOOL	35	9,922
Paulding GA	TAYLOR FARM PARK	31	4,596
Paulding GA	TAYLOR FARM PARK	35	8,837
Ware GA	100	3	2,672
Ware GA	100	8	3,692
Ware GA	200A	3	0
Ware GA	200A	8	4,133
Ware GA	304	3	0
Ware GA	304	8	2,107
Ware GA	400	3	4,626
Ware GA	400	8	406
Wilcox GA	ROCHELLE SOUTH	13	786
Wilcox GA	ROCHELLE SOUTH	20	794

Esselstyn Report: Attachment I

Proposed Georgia House Districts

Client: H097
Plan: House-prop1-2021
Type: House

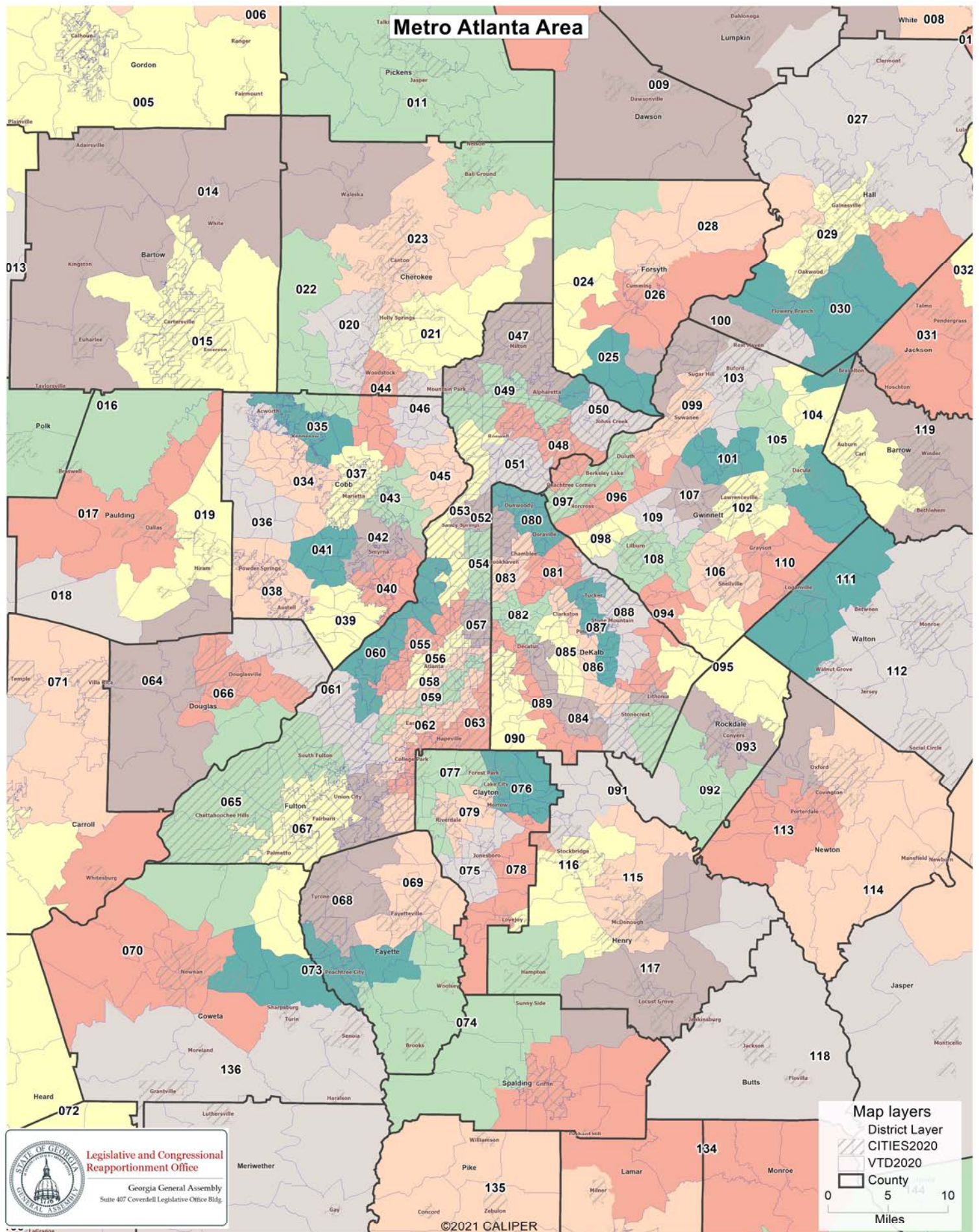


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Map layers
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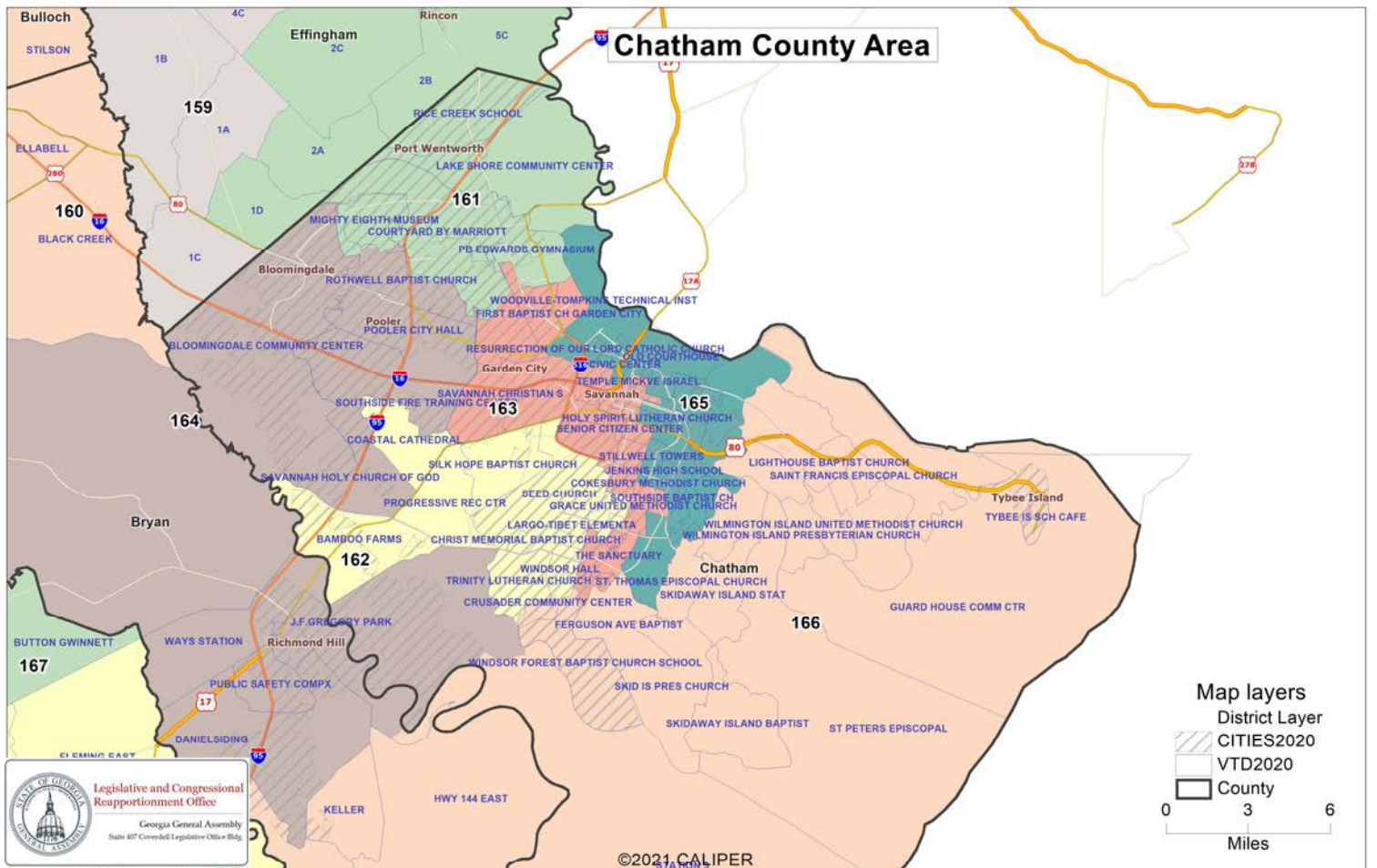
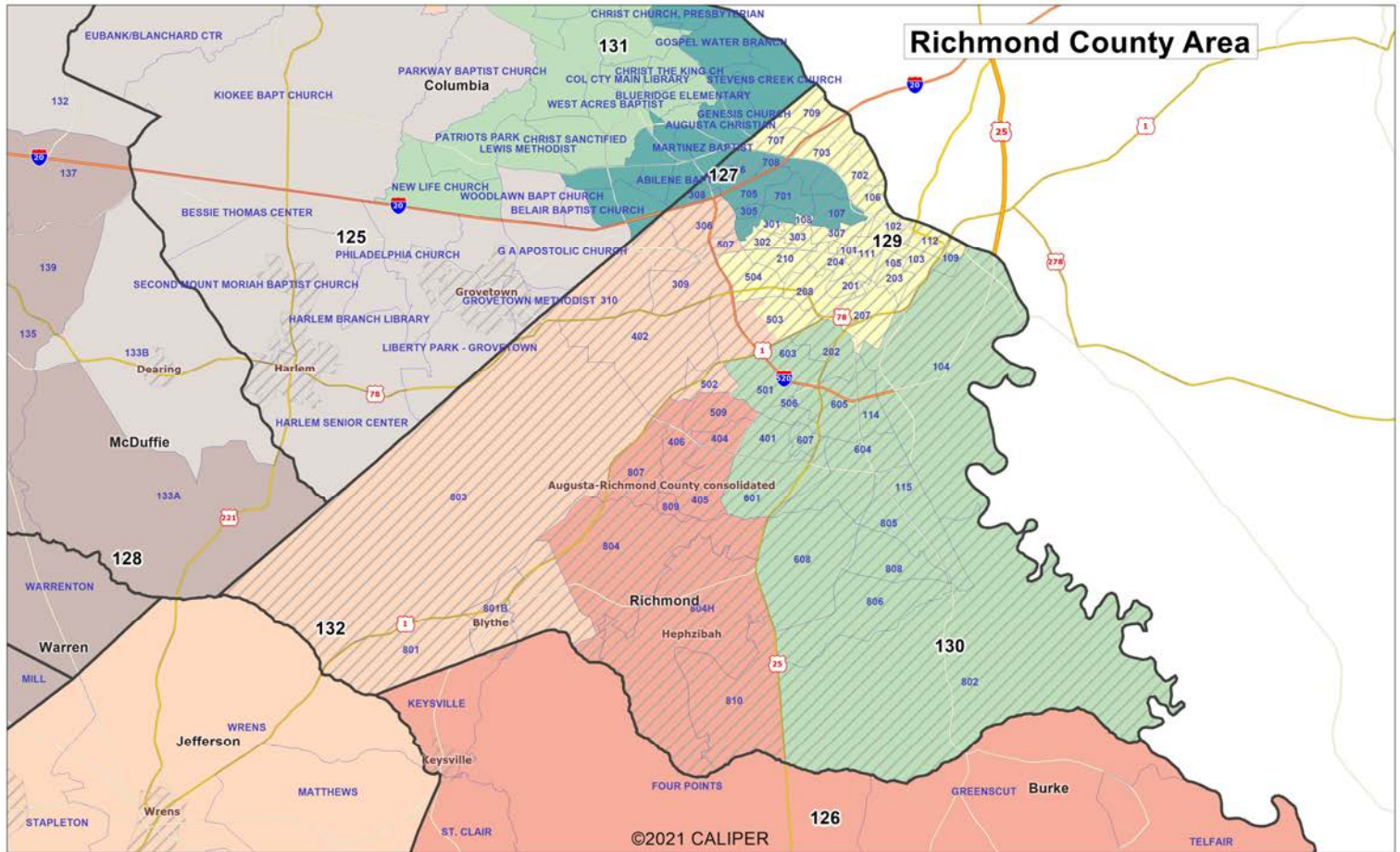
Proposed Georgia House Districts

Client: H097
Plan: House-prop1-2021
Type: House



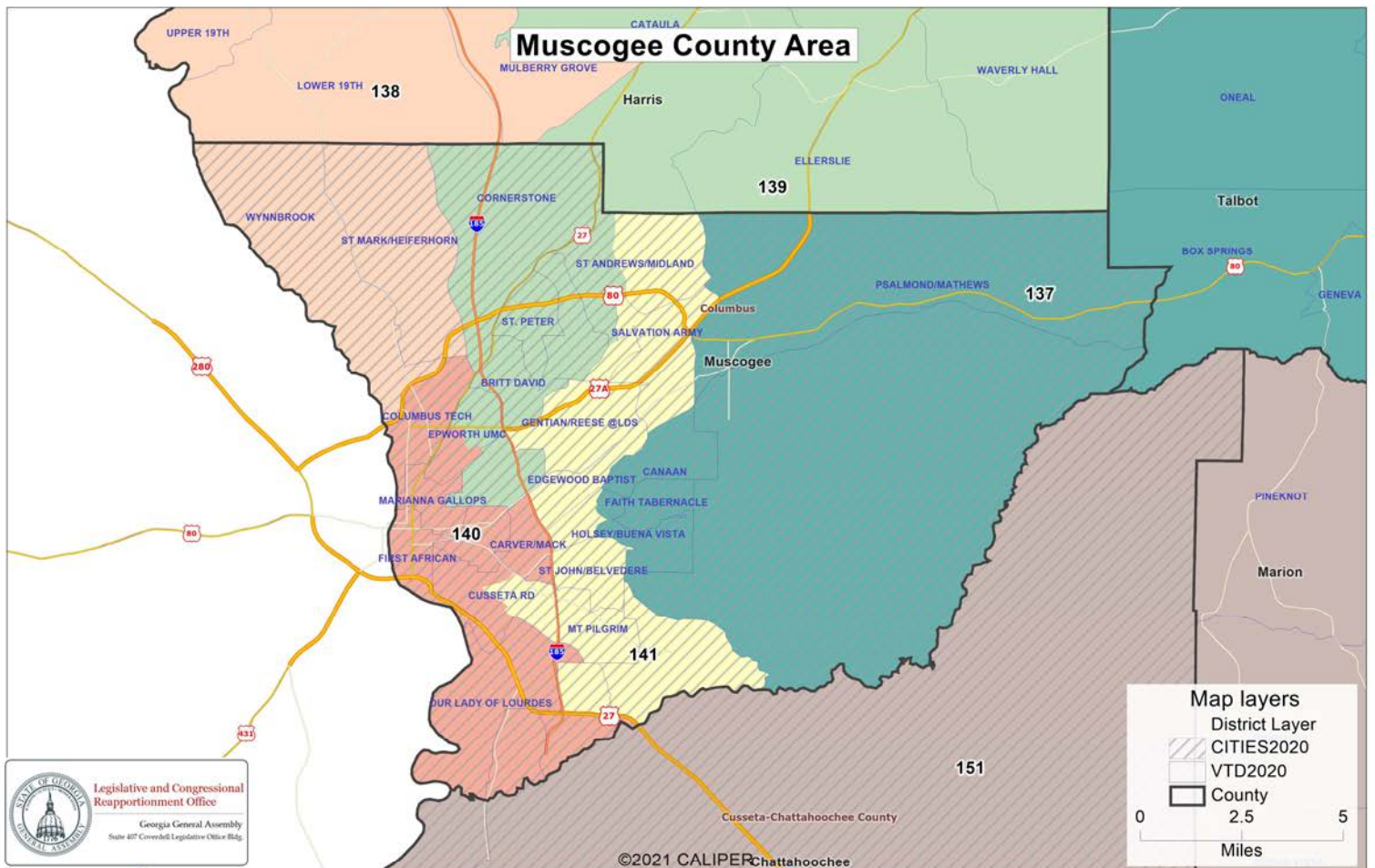
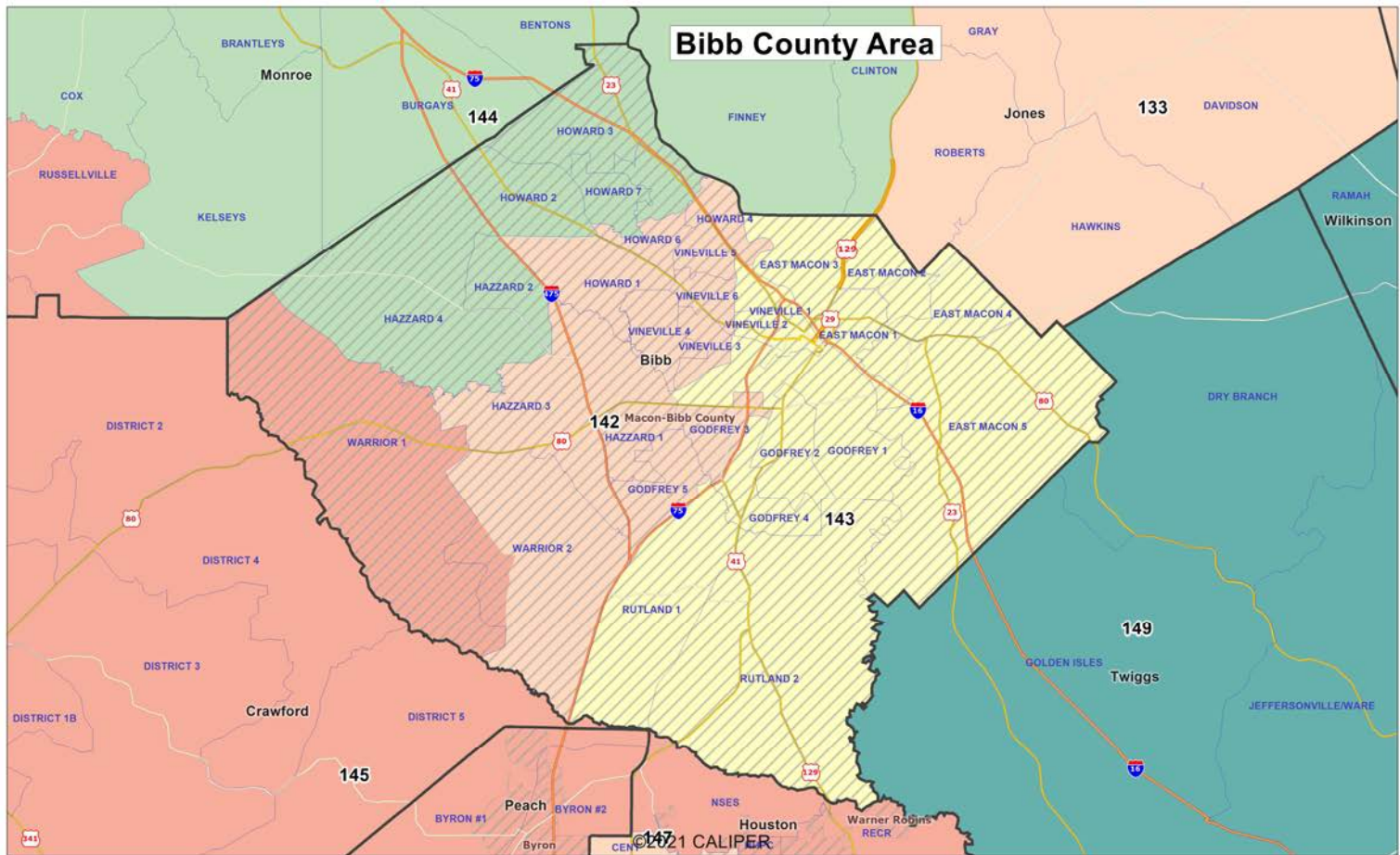
Proposed Georgia House Districts

Client: H097
Plan: House-prop1-2021
Type: House



Proposed Georgia House Districts

Client: H097
Plan: House-prop1-2021
Type: House



User: H097

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

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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

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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

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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: H097

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**

The preceding report, published by the Georgia General Assembly, does not include statistics for the percentage of the voting age population that is “Black or African American alone or in combination,” also known as the “any part Black voting age population” percentage or “APBVAP%.” As these percentages are relevant for determining which House districts can be considered majority-Black under the conventions used in the expert report, I have provided them below after having exported a listing from the *Maptitude for Redistricting* software.

District	APBVAP%	District	APBVAP%	District	APBVAP%	District	APBVAP%	District	APBVAP%
1	4.20%	25	5.90%	49	8.42%	73	12.11%	97	26.77%
2	3.15%	26	4.01%	50	12.40%	74	25.52%	98	23.25%
3	3.35%	27	3.69%	51	23.68%	75	74.40%	99	14.71%
4	5.38%	28	3.93%	52	15.99%	76	67.23%	100	10.01%
5	4.60%	29	13.59%	53	14.53%	77	76.13%	101	24.19%
6	1.51%	30	8.10%	54	15.47%	78	71.58%	102	37.62%
7	0.62%	31	7.57%	55	55.38%	79	71.59%	103	16.79%
8	1.43%	32	7.96%	56	45.48%	80	14.18%	104	17.03%
9	1.57%	33	11.20%	57	18.06%	81	21.83%	105	29.05%
10	3.73%	34	15.67%	58	63.04%	82	16.83%	106	36.27%
11	1.85%	35	28.40%	59	70.09%	83	15.12%	107	29.63%
12	9.68%	36	16.98%	60	63.88%	84	73.66%	108	18.35%
13	19.18%	37	28.18%	61	74.29%	85	62.71%	109	32.51%
14	6.85%	38	54.23%	62	72.26%	86	75.05%	110	47.19%
15	14.19%	39	55.29%	63	69.33%	87	73.08%	111	22.29%
16	11.69%	40	32.98%	64	30.72%	88	63.35%	112	19.21%
17	23.02%	41	39.35%	65	61.98%	89	62.54%	113	59.53%
18	7.98%	42	33.70%	66	53.41%	90	58.49%	114	24.74%
19	24.15%	43	26.53%	67	58.92%	91	70.04%	115	52.13%
20	9.25%	44	12.05%	68	55.75%	92	68.79%	116	58.13%
21	5.06%	45	5.28%	69	63.56%	93	65.36%	117	36.61%
22	15.10%	46	8.07%	70	27.83%	94	69.04%	118	23.60%
23	6.50%	47	10.72%	71	19.92%	95	67.15%	119	13.49%
24	7.00%	48	11.79%	72	20.86%	96	23.00%	120	14.28%

(Table continues on following page.)

(Cont.)

District	APBVAP%	District	APBVAP%	District	APBVAP%	District	APBVAP%	District	APBVAP%
121	9.56%	133	36.76%	145	35.67%	157	24.67%	169	29.04%
122	28.42%	134	33.57%	146	27.61%	158	31.20%	170	24.22%
123	24.28%	135	23.75%	147	30.12%	159	24.50%	171	39.60%
124	25.58%	136	28.67%	148	34.02%	160	22.60%	172	23.32%
125	23.68%	137	52.13%	149	32.15%	161	27.14%	173	36.27%
126	54.47%	138	19.32%	150	53.56%	162	43.73%	174	17.37%
127	18.52%	139	20.27%	151	42.41%	163	45.49%	175	24.17%
128	50.41%	140	57.63%	152	26.06%	164	23.47%	176	22.68%
129	54.87%	141	57.46%	153	67.95%	165	50.33%	177	53.88%
130	59.91%	142	59.52%	154	54.82%	166	5.67%	178	14.79%
131	17.62%	143	60.79%	155	35.85%	167	22.28%	179	27.03%
132	52.34%	144	29.33%	156	30.25%	168	46.26%	180	18.21%

Esselstyn Report: Attachment J

District	Population	Deviation	% Deviation	% single-race		% single-race		% single-race		% multi-racial (total pop)	% Hispanic or Latino (total pop)	% Black alone or in combination (total pop)	% Black alone or in combination (voting age pop)
				% single-race White (total pop)	% single-race Black (total pop)	% single-race American Indian Alaska Native (total pop)	% single-race Asian (total pop)	% single-race Pacific Islander (total pop)	% single-race Other (total pop)				
1	59,666	155	0.26%	88.62%	3.94%	0.41%	0.54%	0.06%	1.12%	5.32%	2.59%	5.09%	4.20%
2	59,773	262	0.44%	85.43%	2.68%	0.43%	1.12%	0.02%	3.69%	6.63%	9.09%	3.64%	3.15%
3	60,199	688	1.16%	87.87%	2.90%	0.36%	1.64%	0.14%	1.40%	5.69%	3.60%	4.09%	3.35%
4	59,070	-441	-0.74%	51.31%	4.41%	2.94%	1.27%	0.04%	25.56%	14.47%	50.07%	5.53%	5.38%
5	58,837	-674	-1.13%	78.57%	3.88%	0.60%	1.24%	0.03%	7.79%	7.90%	15.29%	5.24%	4.60%
6	59,712	201	0.34%	83.29%	1.07%	1.22%	0.53%	0.02%	6.80%	7.06%	14.51%	1.88%	1.51%
7	59,081	-430	-0.72%	89.34%	0.40%	0.61%	0.47%	0.02%	4.07%	5.09%	7.43%	0.87%	0.62%
8	59,244	-267	-0.45%	91.67%	1.16%	0.38%	0.55%	0.01%	1.22%	5.01%	3.21%	1.73%	1.43%
9	59,474	-37	-0.06%	89.17%	1.05%	0.49%	0.79%	0.06%	2.17%	6.27%	5.49%	1.79%	1.57%
10	59,519	8	0.01%	81.72%	3.03%	0.47%	1.53%	0.06%	5.51%	7.68%	13.11%	3.84%	3.73%
11	58,792	-719	-1.21%	88.57%	1.61%	0.37%	1.16%	0.03%	1.98%	6.28%	5.33%	2.35%	1.85%
12	59,300	-211	-0.35%	79.74%	8.68%	0.52%	1.01%	0.01%	4.44%	5.61%	7.68%	10.20%	9.68%
13	59,150	-361	-0.61%	64.15%	18.92%	0.81%	1.29%	0.03%	6.65%	8.15%	13.52%	20.65%	19.18%
14	59,135	-376	-0.63%	83.05%	5.98%	0.34%	0.79%	0.03%	3.25%	6.56%	7.04%	7.34%	6.85%
15	59,213	-298	-0.50%	70.65%	13.85%	0.55%	1.31%	0.05%	6.05%	7.56%	11.74%	15.79%	14.19%
16	59,402	-109	-0.18%	75.06%	11.36%	0.61%	0.77%	0.06%	6.25%	5.89%	10.95%	12.76%	11.69%
17	59,120	-391	-0.66%	65.08%	22.54%	0.36%	1.34%	0.08%	2.97%	7.63%	7.90%	25.01%	23.02%
18	59,335	-176	-0.30%	85.62%	7.19%	0.28%	0.61%	0.04%	1.30%	4.96%	2.93%	8.63%	7.98%
19	58,955	-556	-0.93%	63.74%	23.95%	0.39%	1.17%	0.09%	3.33%	7.34%	7.87%	26.38%	24.15%
20	60,107	596	1.00%	76.19%	8.34%	0.31%	2.01%	0.04%	3.95%	9.16%	10.60%	9.94%	9.25%
21	59,529	18	0.03%	81.93%	4.37%	0.38%	1.86%	0.05%	2.97%	8.44%	8.54%	5.63%	5.06%
22	59,460	-51	-0.09%	65.22%	14.31%	0.44%	3.90%	0.04%	5.20%	10.90%	13.26%	16.63%	15.10%
23	59,048	-463	-0.78%	75.17%	5.81%	1.01%	1.08%	0.05%	7.59%	9.29%	17.19%	7.20%	6.50%
24	59,011	-500	-0.84%	61.94%	6.14%	0.45%	17.71%	0.04%	4.82%	8.90%	11.36%	7.31%	7.00%
25	59,414	-97	-0.16%	53.10%	5.06%	0.19%	33.57%	0.03%	1.50%	6.55%	5.42%	6.07%	5.90%
26	59,248	-263	-0.44%	65.34%	3.41%	0.50%	16.82%	0.05%	5.34%	8.54%	12.07%	4.47%	4.01%
27	58,795	-716	-1.20%	82.10%	3.31%	0.44%	0.84%	0.04%	5.55%	7.72%	11.82%	4.40%	3.69%
28	58,972	-539	-0.91%	79.07%	3.49%	0.53%	2.09%	0.03%	5.99%	8.79%	13.59%	4.55%	3.93%
29	59,200	-311	-0.52%	43.92%	12.45%	1.40%	2.77%	0.07%	25.34%	14.04%	46.28%	13.74%	13.59%
30	59,266	-245	-0.41%	70.51%	7.56%	0.49%	3.06%	0.04%	8.72%	9.63%	18.78%	8.75%	8.10%
31	59,901	390	0.66%	69.79%	6.83%	0.61%	2.33%	0.04%	10.78%	9.61%	21.63%	7.96%	7.57%
32	59,145	-366	-0.62%	82.12%	7.33%	0.48%	1.28%	0.07%	2.88%	5.84%	6.03%	8.88%	7.96%
33	59,187	-324	-0.54%	80.79%	11.02%	0.21%	1.20%	0.02%	2.22%	4.54%	4.08%	12.37%	11.20%
34	59,875	364	0.61%	68.37%	14.73%	0.32%	4.45%	0.04%	3.38%	8.70%	9.06%	16.87%	15.67%
35	59,889	378	0.64%	52.51%	27.13%	0.48%	4.49%	0.05%	5.14%	10.20%	12.70%	30.41%	28.40%
36	59,994	483	0.81%	69.47%	16.26%	0.25%	3.10%	0.05%	2.80%	8.08%	7.46%	18.43%	16.98%

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				White (total pop)	Black (total pop)	American Indian Alaska Native (total pop)	Asian (total pop)	Pacific Islander (total pop)	Other (total pop)				
37	59,176	-335	-0.56%	45.62%	26.57%	0.99%	4.53%	0.06%	11.93%	10.30%	21.96%	29.02%	28.18%
38	59,317	-194	-0.33%	27.97%	53.68%	0.59%	1.80%	0.09%	7.72%	8.15%	14.72%	56.91%	54.23%
39	59,381	-130	-0.22%	22.83%	52.84%	0.79%	1.53%	0.04%	12.96%	9.01%	21.79%	55.60%	55.29%
40	59,044	-467	-0.78%	50.09%	31.39%	0.25%	8.59%	0.03%	2.33%	7.32%	6.43%	34.18%	32.98%
41	60,122	611	1.03%	29.51%	37.00%	1.11%	2.85%	0.06%	16.74%	12.72%	33.22%	39.66%	39.35%
42	59,620	109	0.18%	38.93%	31.87%	0.61%	7.17%	0.05%	10.28%	11.09%	20.49%	34.76%	33.70%
43	59,464	-47	-0.08%	45.84%	24.83%	0.92%	7.85%	0.10%	9.01%	11.45%	15.85%	27.49%	26.53%
44	60,002	491	0.83%	66.91%	11.23%	0.41%	5.74%	0.04%	5.13%	10.53%	11.99%	13.32%	12.05%
45	59,738	227	0.38%	73.40%	4.24%	0.15%	12.96%	0.02%	1.48%	7.75%	5.50%	5.53%	5.28%
46	59,108	-403	-0.68%	74.02%	6.93%	0.26%	6.95%	0.04%	2.77%	9.03%	8.24%	8.59%	8.07%
47	59,126	-385	-0.65%	63.20%	9.59%	0.31%	15.95%	0.03%	2.72%	8.19%	7.83%	11.15%	10.72%
48	59,003	-508	-0.85%	60.96%	10.38%	0.43%	11.79%	0.06%	6.20%	10.18%	14.10%	12.23%	11.79%
49	59,153	-358	-0.60%	70.45%	7.33%	0.17%	11.43%	0.03%	2.42%	8.17%	7.56%	8.85%	8.42%
50	59,523	12	0.02%	42.70%	11.30%	0.14%	35.51%	0.04%	2.70%	7.60%	7.06%	13.04%	12.40%
51	58,952	-559	-0.94%	53.22%	22.42%	0.44%	5.86%	0.05%	7.50%	10.50%	15.47%	25.05%	23.68%
52	59,811	300	0.50%	55.20%	13.94%	0.30%	19.75%	0.06%	3.11%	7.64%	7.98%	15.82%	15.99%
53	59,953	442	0.74%	71.67%	12.59%	0.20%	4.49%	0.03%	3.08%	7.94%	8.20%	14.49%	14.53%
54	60,083	572	0.96%	62.88%	13.25%	0.42%	6.56%	0.05%	7.69%	9.16%	15.17%	15.06%	15.47%
55	59,971	460	0.77%	34.75%	55.03%	0.28%	2.88%	0.05%	2.12%	4.90%	5.14%	57.32%	55.38%
56	58,929	-582	-0.98%	35.60%	46.85%	0.24%	9.36%	0.08%	1.88%	5.99%	5.81%	49.24%	45.48%
57	59,969	458	0.77%	64.40%	15.89%	0.36%	7.63%	0.03%	3.92%	7.76%	8.83%	17.83%	18.06%
58	59,057	-454	-0.76%	26.52%	63.71%	0.23%	2.79%	0.04%	1.78%	4.93%	5.03%	66.10%	63.04%
59	59,434	-77	-0.13%	20.24%	70.27%	0.26%	2.54%	0.03%	1.60%	5.07%	4.45%	73.14%	70.09%
60	59,709	198	0.33%	27.39%	62.26%	0.35%	2.05%	0.05%	2.94%	4.95%	5.87%	64.58%	63.88%
61	58,950	-561	-0.94%	34.98%	52.47%	0.42%	1.40%	0.05%	4.25%	6.44%	8.36%	55.51%	53.49%
62	59,450	-61	-0.10%	18.14%	70.86%	0.38%	1.16%	0.06%	4.11%	5.29%	7.61%	73.56%	72.26%
63	59,381	-130	-0.22%	18.46%	68.64%	0.56%	1.36%	0.05%	5.60%	5.33%	10.42%	70.98%	69.33%
64	59,648	137	0.23%	36.92%	48.40%	0.45%	1.04%	0.09%	5.96%	7.14%	11.25%	51.05%	50.24%
65	59,240	-271	-0.46%	30.99%	61.67%	0.27%	0.81%	0.04%	1.62%	4.59%	3.70%	64.10%	63.34%
66	58,961	-550	-0.92%	31.21%	53.46%	0.47%	1.86%	0.10%	5.44%	7.46%	10.88%	56.82%	53.88%
67	59,135	-376	-0.63%	30.47%	57.71%	0.33%	1.31%	0.03%	4.63%	5.52%	8.71%	59.93%	58.92%
68	59,477	-34	-0.06%	32.13%	55.20%	0.33%	2.82%	0.05%	3.68%	5.78%	7.30%	57.48%	55.75%
69	58,358	-1,153	-1.94%	26.08%	61.75%	0.28%	2.95%	0.04%	3.29%	5.61%	6.42%	64.56%	62.73%
70	59,121	-390	-0.66%	58.14%	27.99%	0.40%	2.19%	0.05%	4.48%	6.75%	9.08%	30.02%	27.83%
71	59,538	27	0.05%	68.61%	19.16%	0.45%	0.98%	0.02%	3.53%	7.25%	7.44%	21.49%	19.92%
72	59,660	149	0.25%	68.83%	19.64%	0.38%	0.96%	0.03%	4.59%	5.58%	8.16%	21.43%	20.86%

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				White (total pop)	Black (total pop)	American Indian Alaska Native (total pop)	Asian (total pop)	Native Hawaiian Pacific Islander (total pop)	Other (total pop)				
73	60,036	525	0.88%	71.55%	11.47%	0.30%	5.94%	0.04%	2.53%	8.17%	7.96%	13.10%	12.11%
74	58,418	-1,093	-1.84%	34.64%	52.32%	0.33%	2.41%	0.06%	4.25%	5.99%	8.22%	54.91%	53.94%
75	59,759	248	0.42%	14.87%	65.44%	0.59%	4.89%	0.07%	8.12%	6.03%	13.11%	68.43%	66.89%
76	59,759	248	0.42%	10.18%	64.99%	0.82%	8.16%	0.06%	9.45%	6.35%	15.61%	67.71%	67.23%
77	59,242	-269	-0.45%	7.77%	73.39%	0.59%	4.06%	0.08%	9.22%	4.89%	14.22%	75.90%	76.13%
78	59,890	379	0.64%	36.56%	51.33%	0.44%	1.69%	0.04%	3.94%	6.01%	8.29%	54.01%	51.03%
79	59,500	-11	-0.02%	7.56%	69.08%	0.94%	4.92%	0.03%	11.61%	5.87%	18.11%	71.79%	71.59%
80	59,461	-50	-0.08%	47.83%	12.00%	1.52%	13.08%	0.07%	15.40%	10.10%	26.17%	13.67%	14.18%
81	59,007	-504	-0.85%	47.01%	19.09%	1.27%	8.24%	0.03%	13.87%	10.49%	24.58%	21.16%	21.83%
82	59,724	213	0.36%	63.25%	14.66%	0.28%	11.08%	0.03%	2.93%	7.77%	7.52%	16.35%	16.83%
83	59,416	-95	-0.16%	47.55%	12.45%	1.70%	6.34%	0.03%	21.02%	10.92%	33.75%	14.01%	15.12%
84	59,862	351	0.59%	21.61%	70.46%	0.19%	1.44%	0.03%	1.26%	5.01%	3.40%	73.35%	73.66%
85	59,373	-138	-0.23%	18.61%	60.90%	0.38%	12.33%	0.03%	2.65%	5.11%	5.99%	63.41%	62.71%
86	59,205	-306	-0.51%	11.04%	72.44%	0.30%	9.07%	0.02%	2.71%	4.42%	4.64%	75.09%	75.05%
87	59,709	198	0.33%	12.16%	70.92%	0.41%	6.49%	0.02%	4.81%	5.20%	7.73%	74.02%	73.08%
88	59,689	178	0.30%	17.17%	61.41%	0.65%	7.51%	0.07%	6.54%	6.65%	11.46%	64.53%	63.35%
89	59,866	355	0.60%	31.03%	60.27%	0.22%	1.80%	0.03%	1.37%	5.29%	3.80%	62.63%	62.54%
90	59,812	301	0.51%	32.92%	57.69%	0.24%	1.62%	0.04%	1.83%	5.67%	4.65%	60.13%	58.49%
91	59,956	445	0.75%	32.76%	58.67%	0.24%	1.19%	0.03%	2.03%	5.07%	4.42%	61.23%	60.01%
92	60,273	762	1.28%	21.57%	68.31%	0.24%	1.59%	0.04%	2.99%	5.27%	5.49%	71.31%	68.79%
93	60,118	607	1.02%	21.33%	64.04%	0.36%	1.34%	0.11%	6.56%	6.26%	11.24%	66.95%	65.36%
94	59,211	-300	-0.50%	17.43%	66.81%	0.45%	4.88%	0.03%	4.41%	5.99%	8.72%	69.91%	69.04%
95	60,030	519	0.87%	19.99%	65.91%	0.39%	2.30%	0.08%	4.61%	6.72%	9.32%	69.44%	67.15%
96	59,515	4	0.01%	21.85%	21.31%	1.48%	17.72%	0.08%	25.19%	12.37%	40.49%	23.47%	23.00%
97	59,072	-439	-0.74%	35.90%	25.79%	0.68%	15.07%	0.09%	11.43%	11.04%	21.86%	28.56%	26.77%
98	59,998	487	0.82%	15.89%	20.23%	2.15%	10.77%	0.10%	36.38%	14.49%	57.42%	22.14%	23.25%
99	59,850	339	0.57%	41.47%	13.80%	0.36%	32.56%	0.05%	3.65%	8.11%	9.52%	15.90%	14.71%
100	60,030	519	0.87%	57.78%	9.19%	0.42%	19.53%	0.06%	4.06%	8.96%	10.85%	10.66%	10.01%
101	59,938	427	0.72%	40.65%	22.90%	0.69%	15.32%	0.06%	8.64%	11.74%	20.17%	25.66%	24.19%
102	58,959	-552	-0.93%	29.76%	37.16%	0.98%	9.04%	0.04%	12.08%	10.94%	23.45%	40.20%	37.62%
103	60,197	686	1.15%	52.61%	15.52%	0.60%	11.76%	0.06%	8.69%	10.76%	19.06%	17.66%	16.79%
104	59,362	-149	-0.25%	62.99%	15.96%	0.40%	6.37%	0.05%	5.27%	8.95%	12.64%	18.10%	17.03%
105	59,344	-167	-0.28%	41.69%	28.45%	0.51%	10.63%	0.04%	7.83%	10.85%	18.10%	31.08%	29.05%
106	59,112	-399	-0.67%	38.57%	36.27%	0.61%	9.86%	0.06%	5.99%	8.65%	12.66%	39.28%	36.27%
107	59,702	191	0.32%	23.31%	28.16%	1.39%	15.52%	0.05%	18.46%	13.13%	34.49%	30.77%	29.63%
108	59,577	66	0.11%	41.71%	17.71%	0.93%	18.12%	0.04%	11.15%	10.35%	20.98%	20.05%	18.35%

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109	59,630	119	0.20%	18.29%	30.16%	1.16%	14.48%	0.07%	22.25%	13.59%	39.32%	32.86%	32.51%
110	59,951	440	0.74%	34.57%	46.58%	0.33%	4.53%	0.06%	5.00%	8.94%	11.87%	50.11%	47.19%
111	60,009	498	0.84%	62.34%	22.08%	0.40%	2.53%	0.07%	4.84%	7.75%	10.37%	24.28%	22.29%
112	59,349	-162	-0.27%	72.57%	19.06%	0.28%	1.28%	0.06%	1.89%	4.87%	4.00%	20.49%	19.21%
113	60,053	542	0.91%	30.11%	58.29%	0.30%	0.81%	0.14%	4.15%	6.21%	7.78%	61.62%	59.53%
114	59,867	356	0.60%	67.78%	24.16%	0.28%	0.71%	0.04%	2.21%	4.83%	4.53%	25.79%	24.74%
115	59,789	278	0.47%	30.02%	53.14%	0.46%	4.80%	0.06%	4.84%	6.70%	9.30%	56.23%	53.77%
116	60,380	869	1.46%	33.11%	52.02%	0.29%	4.57%	0.08%	3.53%	6.39%	7.80%	55.04%	51.95%
117	60,142	631	1.06%	36.94%	50.92%	0.30%	1.57%	0.06%	3.70%	6.51%	7.78%	53.97%	51.56%
118	59,987	476	0.80%	69.35%	22.72%	0.26%	0.45%	0.03%	1.99%	5.21%	4.50%	24.16%	23.60%
119	58,947	-564	-0.95%	69.24%	12.73%	0.46%	3.87%	0.03%	5.81%	7.87%	12.17%	14.47%	13.49%
120	58,982	-529	-0.89%	71.79%	13.65%	0.34%	4.08%	0.06%	3.79%	6.29%	8.42%	15.04%	14.28%
121	59,127	-384	-0.65%	76.66%	8.80%	0.18%	5.66%	0.01%	2.50%	6.19%	6.27%	9.96%	9.56%
122	59,632	121	0.20%	51.35%	30.85%	0.60%	2.17%	0.08%	8.43%	6.54%	13.78%	32.33%	28.42%
123	59,282	-229	-0.38%	67.02%	23.91%	0.30%	1.16%	0.03%	2.63%	4.94%	5.33%	25.32%	24.28%
124	59,221	-290	-0.49%	62.85%	26.19%	0.32%	1.15%	0.03%	3.77%	5.71%	7.57%	27.61%	25.58%
125	60,137	626	1.05%	62.06%	22.24%	0.45%	2.48%	0.22%	3.27%	9.29%	8.93%	25.37%	23.68%
126	59,260	-251	-0.42%	38.66%	54.30%	0.34%	0.76%	0.16%	1.55%	4.22%	3.63%	56.45%	54.47%
127	58,678	-833	-1.40%	67.34%	17.46%	0.27%	5.68%	0.18%	1.94%	7.13%	5.58%	19.67%	18.52%
128	58,864	-647	-1.09%	44.54%	51.11%	0.21%	0.36%	0.04%	0.81%	2.92%	1.91%	52.50%	50.41%
129	58,829	-682	-1.15%	34.71%	55.50%	0.31%	2.12%	0.15%	2.15%	5.05%	4.74%	58.21%	54.87%
130	59,203	-308	-0.52%	30.99%	60.84%	0.33%	0.82%	0.19%	1.93%	4.90%	4.33%	63.45%	59.91%
131	58,890	-621	-1.04%	67.43%	16.38%	0.29%	4.98%	0.17%	1.99%	8.77%	7.07%	18.92%	17.62%
132	59,142	-369	-0.62%	35.30%	52.48%	0.35%	2.42%	0.19%	3.20%	6.05%	7.91%	55.26%	52.34%
133	59,768	257	0.43%	68.72%	25.32%	0.16%	1.00%	0.03%	1.00%	3.77%	2.36%	26.58%	26.11%
134	59,046	-465	-0.78%	53.95%	38.20%	0.30%	0.75%	0.03%	1.98%	4.79%	4.33%	40.04%	37.41%
135	60,013	502	0.84%	74.82%	19.45%	0.24%	0.62%	0.01%	1.02%	3.84%	2.12%	20.68%	20.35%
136	59,298	-213	-0.36%	63.16%	28.15%	0.34%	1.55%	0.03%	2.06%	4.71%	4.40%	29.56%	28.67%
137	59,551	40	0.07%	39.25%	51.92%	0.19%	1.69%	0.14%	2.07%	4.75%	5.17%	54.16%	52.13%
138	58,912	-599	-1.01%	71.33%	18.92%	0.36%	2.41%	0.06%	1.57%	5.36%	4.10%	20.49%	19.32%
139	59,010	-501	-0.84%	65.30%	19.63%	0.39%	4.09%	0.22%	2.55%	7.82%	7.24%	21.77%	20.27%
140	59,294	-217	-0.36%	30.34%	56.56%	0.53%	1.06%	0.26%	4.45%	6.81%	9.04%	59.80%	57.63%
141	59,019	-492	-0.83%	30.98%	55.60%	0.36%	2.59%	0.33%	3.04%	7.10%	7.93%	58.90%	57.46%
142	59,320	-191	-0.32%	39.78%	51.89%	0.25%	2.27%	0.02%	2.32%	3.48%	4.22%	53.52%	50.14%
143	59,122	-389	-0.65%	38.76%	52.08%	0.21%	2.55%	0.04%	1.91%	4.44%	3.76%	54.15%	50.64%
144	58,533	-978	-1.64%	64.43%	24.36%	0.33%	2.88%	0.06%	1.91%	6.03%	5.04%	26.09%	24.94%

District	Population	Deviation	% Deviation	% single-race		% single-race		% single-race		% multi-racial (total pop)	% Hispanic or Latino (total pop)	% Black alone or in combination (total pop)	% Black alone or in combination (voting age pop)
				White (total pop)	Black (total pop)	American Indian Alaska Native (total pop)	Asian (total pop)	Pacific Islander (total pop)	Other (total pop)				
145	59,668	157	0.26%	36.17%	51.16%	0.47%	1.19%	0.07%	4.44%	6.50%	8.64%	53.76%	50.38%
146	59,197	-314	-0.53%	67.39%	23.72%	0.21%	1.65%	0.08%	1.64%	5.31%	4.55%	25.26%	24.38%
147	58,567	-944	-1.59%	54.11%	30.64%	0.32%	3.95%	0.10%	3.34%	7.54%	7.61%	33.12%	30.55%
148	59,887	376	0.63%	56.80%	37.60%	0.18%	0.61%	0.03%	1.74%	3.04%	5.86%	38.90%	37.30%
149	59,392	-119	-0.20%	41.24%	52.64%	0.22%	0.77%	0.06%	1.87%	3.21%	2.88%	54.31%	51.53%
150	59,276	-235	-0.39%	37.15%	53.50%	0.30%	1.19%	0.05%	4.73%	3.08%	7.23%	54.77%	53.56%
151	60,059	548	0.92%	46.66%	42.45%	0.27%	1.32%	0.25%	4.52%	4.53%	7.51%	44.17%	42.41%
152	60,134	623	1.05%	66.75%	25.98%	0.27%	1.61%	0.05%	1.33%	4.01%	2.84%	27.20%	26.06%
153	59,299	-212	-0.36%	24.79%	69.44%	0.17%	0.92%	0.03%	1.68%	2.97%	2.93%	71.14%	67.95%
154	59,994	483	0.81%	39.90%	55.77%	0.19%	0.39%	0.02%	1.00%	2.72%	2.10%	57.13%	54.82%
155	60,134	623	1.05%	58.50%	35.73%	0.21%	0.90%	0.05%	1.41%	3.19%	2.65%	37.24%	35.23%
156	60,647	1,136	1.91%	60.55%	29.57%	0.37%	0.61%	0.01%	4.56%	4.33%	8.19%	30.89%	29.87%
157	59,957	446	0.75%	63.89%	23.82%	0.39%	0.56%	0.04%	6.64%	4.65%	11.19%	25.21%	24.67%
158	59,440	-71	-0.12%	60.33%	31.67%	0.27%	0.77%	0.03%	3.07%	3.86%	5.60%	33.07%	31.20%
159	59,895	384	0.65%	68.50%	24.02%	0.35%	0.54%	0.05%	1.54%	5.00%	3.65%	25.56%	24.50%
160	59,935	424	0.71%	68.19%	22.04%	0.32%	1.64%	0.10%	2.38%	5.33%	5.50%	23.64%	22.60%
161	60,097	586	0.98%	59.24%	26.27%	0.34%	3.05%	0.11%	3.15%	7.84%	7.89%	28.87%	27.14%
162	60,308	797	1.34%	38.55%	43.95%	0.43%	4.04%	0.26%	5.71%	7.06%	10.78%	46.66%	43.73%
163	60,123	612	1.03%	39.74%	46.54%	0.40%	3.15%	0.16%	4.62%	5.39%	8.45%	48.40%	45.49%
164	60,101	590	0.99%	60.02%	22.55%	0.45%	4.26%	0.13%	4.01%	8.58%	9.95%	25.07%	23.47%
165	59,978	467	0.78%	36.28%	52.86%	0.30%	3.23%	0.16%	2.74%	4.44%	5.53%	54.85%	50.33%
166	60,242	731	1.23%	84.02%	5.04%	0.23%	2.67%	0.05%	1.68%	6.30%	5.19%	6.05%	5.67%
167	59,493	-18	-0.03%	64.99%	21.40%	0.62%	1.47%	0.26%	3.75%	7.52%	8.81%	23.93%	22.28%
168	60,147	636	1.07%	39.01%	44.49%	0.44%	2.06%	0.73%	3.84%	9.43%	11.22%	49.11%	46.26%
169	59,138	-373	-0.63%	60.27%	29.04%	0.33%	0.79%	0.03%	5.16%	4.37%	9.03%	30.38%	29.04%
170	60,116	605	1.02%	62.84%	24.56%	0.31%	1.19%	0.03%	5.44%	5.62%	10.43%	26.05%	24.22%
171	59,237	-274	-0.46%	52.16%	40.00%	0.33%	0.54%	0.03%	3.52%	3.41%	5.73%	41.21%	39.60%
172	59,961	450	0.76%	60.41%	23.41%	0.80%	0.77%	0.03%	8.71%	5.87%	16.00%	24.67%	23.32%
173	59,743	232	0.39%	53.63%	36.40%	0.63%	0.83%	0.02%	4.16%	4.33%	6.95%	37.84%	36.27%
174	59,852	341	0.57%	73.85%	17.42%	0.47%	0.49%	0.05%	3.09%	4.63%	7.88%	18.81%	17.37%
175	59,993	482	0.81%	65.60%	23.98%	0.37%	1.79%	0.08%	2.45%	5.73%	6.10%	25.56%	24.17%
176	59,470	-41	-0.07%	66.19%	21.96%	0.45%	0.93%	0.11%	4.65%	5.71%	9.95%	23.59%	22.68%
177	59,992	481	0.81%	34.69%	55.26%	0.37%	1.30%	0.09%	3.02%	5.27%	6.69%	57.52%	53.88%
178	59,877	366	0.62%	77.36%	14.59%	0.35%	0.52%	0.01%	3.20%	3.97%	6.22%	15.91%	14.79%
179	59,356	-155	-0.26%	60.43%	28.66%	0.39%	1.07%	0.17%	4.00%	5.27%	7.73%	30.40%	27.03%
180	59,412	-99	-0.17%	70.77%	17.31%	0.47%	1.62%	0.13%	2.05%	7.65%	6.47%	19.73%	18.21%

Esselstyn Report: Attachment K

2021-2022 GUIDELINES FOR THE HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE

I. HEARINGS AND MEETINGS

A. PUBLIC HEARINGS

1. A series of public hearings were held to actively seek public participation and input concerning the General Assembly's redrawing of congressional and legislative districts.
2. Video recordings of all hearings are and shall remain available on the legislative website, www.legis.ga.gov

B. COMMITTEE MEETINGS

1. All formal meetings of the full committee will be open to the public.
2. When the General Assembly is not in session, notices of all such meetings will be posted at the Offices of the Clerk of the House or Secretary of the Senate and other appropriate places at least 24 hours in advance of any meeting. Individual notices may be transmitted by email to any citizen or organization requesting the same without charge. Persons or organizations needing this information should contact the Senate Press Office or House Communications Office or the Secretary of the Senate or Clerk of the House to be placed on the notification list.
3. Minutes of all such meetings shall be kept and maintained in accordance with the rules of the House and Senate. Copies of the minutes should be made available in a timely manner at a reasonable cost in accordance with these same rules.

II. PUBLIC ACCESS TO REDISTRICTING DATA AND MATERIALS

- A. Census information databases on any medium created at public expense and held by the Committee or by the Legislative and Congressional Reapportionment Office for use in the redistricting process are included as public records and copies can be made available to the public in accordance with the rules of the General Assembly and subject to reasonable charges for search, retrieval, reproduction and other reasonable, related costs.
- B. Copies of the public records described above may be obtained at the cost of reproduction by members of the public on electronic media if the material exists on an appropriate electronic medium. Cost of reproduction may include not only the medium on which the copies made, but also the labor cost for the search, retrieval, and reproduction of the records and other reasonable, related costs.

- C. These guidelines regarding public access to redistricting data and materials do not apply to plans or other related materials prepared by or on behalf of an individual Member of the General Assembly using the Legislative and Congressional Reapportionment Office, where those plans and materials have not been made public through presentation to the Committee.

III. REDISTRICTING PLANS

A. GENERAL PRINCIPLES FOR DRAFTING PLANS

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
 - a. The boundaries of counties and precincts;
 - b. Compactness; and
 - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

B. PLANS PRODUCED THROUGH THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. Staff of the Legislative and Congressional Reapportionment Office will be available to all members of the General Assembly requesting assistance in accordance with the policy of that office.
2. Census data and redistricting work maps will be available to all members of the General Assembly upon request, provided that (a) the map was created by the requesting member, (b) the map is publicly available, or (c) the Legislative and Congressional Reapportionment Office has been granted permission by the author of the map to share a copy with the requesting member.
3. As noted above, redistricting plans and other records related to the provision of staff services to individual members of the General Assembly will not be subject to public disclosure. Only the author of a particular map may waive the confidentiality of his or her own work product. This confidentiality provision will not apply with respect to records related to the provision of staff services to any committee or subcommittee as a whole or to any records which are or have been previously disclosed by or pursuant to the direction of an individual member of the General Assembly.

C. PLANS PRODUCED OUTSIDE OF THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. All plans submitted to the Committee will be made part of the public record and made available in the same manner as other committee public records.
2. All plans prepared outside the Legislative and Congressional Reapportionment Office must be submitted to that office prior to presentation to the Committee by a Member of the General Assembly for technical verification and presentation and bill preparation. All pieces of census geography must be accounted for in some district.
3. The electronic submission of material for technical verification must be made in accordance with the following requirements or in a manner specifically approved and accepted by the Legislative and Congressional Reapportionment Office.
 - a. The submission shall be in electronic format with accompanying documentation that shows the submitting sponsor of the proposed plan and contact person for the proposed plan, including email address and telephone number.
 - b. An electronic map image that clearly depicts defined boundaries, utilizing the 2020 United States Census geographic boundaries,

and a block equivalency file containing two columns. The first column shall list the 15-digit census block identification numbers, and the second column shall list the three-digit district identification number. Both block and district numbers shall be zero-filled text files. Such files shall be submitted in .xis, .xlsx, .dbf, .txt, or .csv file formats. The following is a sample:

```
BlockID, DISTRICT
"13001950100101","008"
"13001950100102","008"
"13001950100103","008"
"13001950100104","008"
"13001950100105","008"
"13001950100106","008"
```

4. If submission of the plan cannot be done electronically, the following requirements must be followed:
 - a. All drafts, amendments, or revisions should be on clearly-depicted maps that follow the 2020 Census geographic boundaries and should be accompanied by a statistical sheet listing the Census geography including the total population for each district.
 - b. All plans submitted should either be a complete statewide plan or fit back into the plan that they modified, so that the proposal can be evaluated in the context of a statewide plan. All pieces of Census geography must be accounted for in some district.

D. GENERAL GUIDELINES FOR PRESENTATION OF ALL PLANS

1. A redistricting plan may be presented for consideration by the Committee only through the sponsorship of one or more Member(s) of the General Assembly. All such drafts of and amendments or revisions to plans presented at any committee meeting must be on clearly-depicted maps which follow the 2020 Census geographic boundaries and accompanied by a statistical sheet listing the Census geography, including the total population and minority populations for each proposed district.
2. No plan may be presented to the Committee unless that plan makes accommodations for and fits back into a specific, identified statewide map for the particular legislative body involved.

3. All plans presented at committee meetings will be made available for inspection by the public either electronically or by hard copy available at the Office of Legislative and Congressional Reapportionment.
- E. These guidelines may be reconsidered or amended by the Committee.

Esselstyn Report: Attachment L

More detailed tables for comparative characteristics of House plans

Population Deviation:

The deviation statistics for each individual district in the respective plans can be found in **Attachment I** and **Attachment J**. Below are the summary statistics generated by the *Maptitude for Redistricting* software.

Enacted plan:

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

Illustrative plan:

Population Range:	58,358 to 60,647
Ratio Range:	0.04
Absolute Range:	-1,153 to 1,136
Absolute Overall Range:	2,289
Relative Range:	-1.94% to 1.91%
Relative Overall Range:	3.85%
Absolute Mean Deviation:	379.46
Relative Mean Deviation:	0.64%
Standard Deviation:	442.99

Compactness:

Below is the compactness report for the House enacted plan.

User:

Plan Name: EnachSEfromGA

Plan Type:

Measures of Compactness Report

Tuesday, January 11, 2022

9:53 PM

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
001	0.53	1.45	0.45	0.85
002	0.53	1.95	0.24	0.71
003	0.50	1.49	0.41	0.83
004	0.37	1.93	0.21	0.72
005	0.43	1.67	0.25	0.73
006	0.45	1.72	0.26	0.77
007	0.62	1.31	0.50	0.89
008	0.46	1.71	0.27	0.71
009	0.47	1.63	0.30	0.78
010	0.34	1.48	0.30	0.81
011	0.31	1.72	0.26	0.71

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10
District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
012	0.47	1.66	0.31	0.85
013	0.47	2.06	0.19	0.74
014	0.32	1.95	0.23	0.73
015	0.55	1.63	0.33	0.79
016	0.31	1.57	0.35	0.88
017	0.28	1.97	0.21	0.64
018	0.41	1.88	0.25	0.76
019	0.26	1.90	0.26	0.68
020	0.46	1.40	0.45	0.81
021	0.26	1.81	0.27	0.73
022	0.28	1.80	0.22	0.69
023	0.40	1.84	0.19	0.69
024	0.35	1.77	0.30	0.79
025	0.39	1.69	0.31	0.68

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
026	0.27	1.82	0.26	0.70
027	0.60	1.54	0.34	0.82
028	0.38	1.58	0.35	0.80
029	0.34	1.97	0.21	0.62
030	0.43	1.71	0.30	0.66
031	0.44	1.67	0.25	0.70
032	0.39	1.64	0.33	0.73
033	0.49	1.53	0.37	0.80
034	0.45	1.61	0.33	0.75
035	0.32	1.76	0.24	0.73
036	0.32	1.90	0.23	0.68
037	0.45	1.66	0.28	0.82
038	0.59	1.28	0.58	0.91
039	0.59	1.45	0.40	0.87

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10
District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
040	0.49	1.69	0.29	0.76
041	0.60	1.47	0.40	0.85
042	0.40	2.01	0.21	0.64
043	0.42	1.94	0.22	0.69
044	0.31	1.76	0.29	0.73
045	0.41	1.64	0.32	0.77
046	0.55	1.42	0.47	0.84
047	0.29	2.02	0.21	0.61
048	0.34	2.12	0.19	0.62
049	0.30	2.23	0.15	0.59
050	0.42	1.40	0.46	0.77
051	0.54	1.60	0.36	0.73
052	0.48	1.65	0.35	0.72
053	0.16	2.52	0.14	0.50

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10
District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
054	0.37	1.49	0.45	0.87
055	0.18	2.42	0.16	0.59
056	0.26	2.04	0.23	0.69
057	0.57	1.30	0.59	0.91
058	0.13	2.76	0.13	0.54
059	0.12	2.98	0.11	0.46
060	0.19	2.39	0.15	0.58
061	0.25	2.12	0.20	0.64
062	0.16	2.92	0.10	0.48
063	0.16	2.61	0.14	0.49
064	0.37	1.60	0.36	0.78
065	0.46	2.06	0.17	0.72
066	0.36	1.94	0.25	0.67
067	0.36	2.39	0.12	0.61

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
068	0.32	2.19	0.17	0.71
069	0.40	1.88	0.25	0.69
070	0.45	1.94	0.23	0.65
071	0.44	1.56	0.35	0.79
072	0.42	1.86	0.23	0.73
073	0.28	2.12	0.20	0.66
074	0.50	1.79	0.25	0.76
075	0.42	1.82	0.28	0.64
076	0.53	1.33	0.51	0.86
077	0.40	2.11	0.21	0.64
078	0.21	2.08	0.19	0.62
079	0.50	2.06	0.21	0.73
080	0.38	1.49	0.42	0.79
081	0.47	1.54	0.40	0.81

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
082	0.49	1.74	0.30	0.72
083	0.34	1.62	0.36	0.80
084	0.25	1.97	0.20	0.67
085	0.36	1.65	0.32	0.77
086	0.17	2.34	0.17	0.55
087	0.26	1.97	0.24	0.70
088	0.26	2.14	0.20	0.67
089	0.14	2.90	0.10	0.47
090	0.36	1.78	0.29	0.83
091	0.45	2.08	0.20	0.62
092	0.36	1.98	0.20	0.71
093	0.26	2.66	0.11	0.54
094	0.31	2.42	0.15	0.56
095	0.44	1.72	0.25	0.75

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
096	0.18	2.18	0.21	0.66
097	0.28	1.96	0.24	0.67
098	0.42	1.35	0.52	0.88
099	0.36	1.80	0.29	0.72
100	0.34	1.78	0.29	0.66
101	0.53	1.44	0.46	0.82
102	0.56	1.58	0.35	0.77
103	0.33	1.96	0.24	0.62
104	0.28	1.90	0.25	0.74
105	0.34	1.78	0.28	0.69
106	0.66	1.36	0.50	0.85
107	0.51	1.68	0.32	0.75
108	0.43	1.64	0.32	0.71
109	0.39	1.70	0.28	0.70

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10
District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
110	0.36	1.68	0.33	0.74
111	0.33	1.76	0.29	0.68
112	0.62	1.26	0.52	0.91
113	0.50	1.57	0.32	0.85
114	0.51	1.70	0.28	0.71
115	0.44	1.92	0.23	0.63
116	0.41	1.81	0.28	0.63
117	0.41	1.74	0.28	0.75
118	0.35	1.92	0.22	0.68
119	0.39	1.89	0.21	0.64
120	0.44	1.83	0.25	0.72
121	0.43	1.61	0.30	0.76
122	0.48	1.48	0.43	0.85
123	0.30	1.89	0.18	0.69

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
124	0.44	1.78	0.23	0.69
125	0.41	1.89	0.17	0.72
126	0.52	1.39	0.41	0.80
127	0.35	2.17	0.20	0.58
128	0.60	1.51	0.32	0.79
129	0.48	1.94	0.25	0.66
130	0.51	1.48	0.25	0.75
131	0.38	1.74	0.28	0.70
132	0.27	1.69	0.30	0.75
133	0.55	1.36	0.42	0.83
134	0.33	1.96	0.23	0.67
135	0.57	1.32	0.42	0.88
136	0.54	1.74	0.26	0.77
137	0.33	2.22	0.16	0.57

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
138	0.33	2.00	0.20	0.70
139	0.28	1.93	0.23	0.66
140	0.29	2.06	0.19	0.65
141	0.26	2.16	0.20	0.52
142	0.35	1.82	0.23	0.70
143	0.50	1.53	0.30	0.79
144	0.51	1.56	0.32	0.84
145	0.38	1.85	0.19	0.72
146	0.26	2.00	0.19	0.62
147	0.33	1.84	0.26	0.64
148	0.44	1.81	0.24	0.69
149	0.32	1.68	0.22	0.72
150	0.44	1.67	0.28	0.78
151	0.53	1.82	0.22	0.71

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
152	0.40	1.68	0.30	0.81
153	0.30	1.73	0.30	0.70
154	0.41	1.48	0.33	0.79
155	0.49	1.33	0.48	0.89
156	0.23	1.92	0.20	0.67
157	0.32	1.95	0.19	0.72
158	0.48	1.52	0.33	0.80
159	0.34	1.62	0.22	0.73
160	0.49	1.32	0.37	0.88
161	0.51	1.51	0.31	0.81
162	0.37	1.99	0.21	0.61
163	0.27	2.34	0.18	0.54
164	0.30	2.10	0.17	0.66
165	0.23	2.23	0.16	0.52

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
166	0.43	1.43	0.36	0.82
167	0.42	1.97	0.19	0.65
168	0.24	1.67	0.26	0.69
169	0.28	1.97	0.23	0.64
170	0.53	1.49	0.34	0.82
171	0.35	1.46	0.37	0.83
172	0.44	1.59	0.32	0.77
173	0.57	1.46	0.38	0.85
174	0.41	1.70	0.24	0.75
175	0.47	1.54	0.37	0.83
176	0.34	2.23	0.16	0.54
177	0.43	1.57	0.34	0.76
178	0.48	1.83	0.22	0.75
179	0.45	1.39	0.42	0.87

Measures of Compactness Report

EnacHSEfromGA

Number of cut edges: 22,020

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.80	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10
District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
180	0.61	1.23	0.40	0.85

Measures of Compactness Report

EnacHSEfromGA

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Schwartzberg	The measure is usually greater than or equal to 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.
Cut Edges	A smaller number implies a more compact plan. The measure should only be used to compare plans defined on the same base layer.

Below is the compactness report for the House illustrative plan.

User:

Plan Name: GA House Illustrative

Plan Type:

Measures of Compactness Report

Saturday, December 3, 2022

10:02 PM

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
1	0.53	1.45	0.45	0.85
2	0.53	1.95	0.24	0.71
3	0.50	1.49	0.41	0.83
4	0.37	1.93	0.21	0.72
5	0.43	1.67	0.25	0.73
6	0.45	1.72	0.26	0.77
7	0.62	1.31	0.50	0.89
8	0.46	1.71	0.27	0.71
9	0.47	1.63	0.30	0.78
10	0.34	1.48	0.30	0.81
11	0.31	1.72	0.26	0.71

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
12	0.47	1.66	0.31	0.85
13	0.47	2.06	0.19	0.74
14	0.32	1.95	0.23	0.73
15	0.55	1.63	0.33	0.79
16	0.31	1.57	0.35	0.88
17	0.28	1.97	0.21	0.64
18	0.41	1.88	0.25	0.76
19	0.26	1.90	0.26	0.68
20	0.46	1.40	0.45	0.81
21	0.26	1.81	0.27	0.73
22	0.28	1.80	0.22	0.69
23	0.40	1.84	0.19	0.69
24	0.35	1.77	0.30	0.79
25	0.39	1.69	0.31	0.68

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
26	0.27	1.82	0.26	0.70
27	0.60	1.54	0.34	0.82
28	0.38	1.58	0.35	0.80
29	0.34	1.97	0.21	0.62
30	0.43	1.71	0.30	0.66
31	0.44	1.67	0.25	0.70
32	0.39	1.64	0.33	0.73
33	0.49	1.53	0.37	0.80
34	0.45	1.61	0.33	0.75
35	0.32	1.76	0.24	0.73
36	0.32	1.90	0.23	0.68
37	0.45	1.66	0.28	0.82
38	0.59	1.28	0.58	0.91
39	0.59	1.45	0.40	0.87

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
40	0.49	1.69	0.29	0.76
41	0.60	1.47	0.40	0.85
42	0.40	2.01	0.21	0.64
43	0.42	1.94	0.22	0.69
44	0.31	1.76	0.29	0.73
45	0.41	1.64	0.32	0.77
46	0.55	1.42	0.47	0.84
47	0.29	2.02	0.21	0.61
48	0.34	2.12	0.19	0.62
49	0.30	2.23	0.15	0.59
50	0.42	1.40	0.46	0.77
51	0.54	1.60	0.36	0.73
52	0.48	1.65	0.35	0.72
53	0.16	2.52	0.14	0.50

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
54	0.37	1.49	0.45	0.87
55	0.18	2.42	0.16	0.59
56	0.26	2.04	0.23	0.69
57	0.57	1.30	0.59	0.91
58	0.13	2.76	0.13	0.54
59	0.12	2.98	0.11	0.46
60	0.19	2.39	0.15	0.58
61	0.33	2.05	0.21	0.60
62	0.16	2.92	0.10	0.48
63	0.16	2.61	0.14	0.49
64	0.22	2.05	0.22	0.59
65	0.36	2.59	0.11	0.59
66	0.39	1.63	0.35	0.79
67	0.36	2.39	0.12	0.61

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
68	0.32	2.19	0.17	0.71
69	0.33	2.06	0.22	0.68
70	0.45	1.94	0.23	0.65
71	0.44	1.56	0.35	0.79
72	0.42	1.86	0.23	0.73
73	0.28	2.12	0.20	0.66
74	0.30	1.98	0.19	0.61
75	0.46	2.23	0.18	0.68
76	0.53	1.33	0.51	0.86
77	0.40	2.11	0.21	0.64
78	0.31	2.05	0.18	0.65
79	0.50	2.06	0.21	0.73
80	0.38	1.49	0.42	0.79
81	0.47	1.54	0.40	0.81

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
82	0.49	1.74	0.30	0.72
83	0.34	1.62	0.36	0.80
84	0.25	1.97	0.20	0.67
85	0.36	1.65	0.32	0.77
86	0.17	2.34	0.17	0.55
87	0.26	1.97	0.24	0.70
88	0.26	2.14	0.20	0.67
89	0.14	2.90	0.10	0.47
90	0.36	1.78	0.29	0.83
91	0.27	2.15	0.17	0.63
92	0.36	1.98	0.20	0.71
93	0.26	2.66	0.11	0.54
94	0.31	2.42	0.15	0.56
95	0.44	1.72	0.25	0.75

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
96	0.18	2.18	0.21	0.66
97	0.28	1.96	0.24	0.67
98	0.42	1.35	0.52	0.88
99	0.36	1.80	0.29	0.72
100	0.34	1.78	0.29	0.66
101	0.53	1.44	0.46	0.82
102	0.56	1.58	0.35	0.77
103	0.33	1.96	0.24	0.62
104	0.28	1.90	0.25	0.74
105	0.34	1.78	0.28	0.69
106	0.66	1.36	0.50	0.85
107	0.51	1.68	0.32	0.75
108	0.43	1.64	0.32	0.71
109	0.39	1.70	0.28	0.70

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
110	0.36	1.68	0.33	0.74
111	0.33	1.76	0.29	0.68
112	0.62	1.26	0.52	0.91
113	0.50	1.57	0.32	0.85
114	0.51	1.70	0.28	0.71
115	0.29	1.77	0.28	0.71
116	0.33	1.98	0.23	0.62
117	0.40	1.62	0.33	0.76
118	0.35	1.92	0.22	0.68
119	0.39	1.89	0.21	0.64
120	0.44	1.83	0.25	0.72
121	0.43	1.61	0.30	0.76
122	0.48	1.48	0.43	0.85
123	0.30	1.89	0.18	0.69

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
124	0.44	1.78	0.23	0.69
125	0.41	1.89	0.17	0.72
126	0.52	1.39	0.41	0.80
127	0.35	2.17	0.20	0.58
128	0.60	1.51	0.32	0.79
129	0.48	1.94	0.25	0.66
130	0.51	1.48	0.25	0.75
131	0.38	1.74	0.28	0.70
132	0.27	1.69	0.30	0.75
133	0.36	1.69	0.29	0.76
134	0.37	1.73	0.31	0.74
135	0.39	1.79	0.23	0.69
136	0.54	1.74	0.26	0.77
137	0.33	2.22	0.16	0.57

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
138	0.33	2.00	0.20	0.70
139	0.28	1.93	0.23	0.66
140	0.29	2.06	0.19	0.65
141	0.26	2.16	0.20	0.52
142	0.56	1.42	0.36	0.84
143	0.31	1.85	0.26	0.65
144	0.43	1.83	0.22	0.71
145	0.34	1.63	0.21	0.76
146	0.50	1.79	0.26	0.68
147	0.44	1.57	0.37	0.80
148	0.35	2.23	0.18	0.59
149	0.46	1.48	0.28	0.83
150	0.44	1.67	0.28	0.78
151	0.53	1.82	0.22	0.71

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
152	0.40	1.68	0.30	0.81
153	0.30	1.73	0.30	0.70
154	0.41	1.48	0.33	0.79
155	0.47	1.40	0.44	0.86
156	0.25	1.94	0.20	0.71
157	0.32	1.95	0.19	0.72
158	0.48	1.52	0.33	0.80
159	0.34	1.62	0.22	0.73
160	0.49	1.32	0.37	0.88
161	0.51	1.51	0.31	0.81
162	0.37	1.99	0.21	0.61
163	0.27	2.34	0.18	0.54
164	0.30	2.10	0.17	0.66
165	0.23	2.23	0.16	0.52

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10

District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
166	0.43	1.43	0.36	0.82
167	0.42	1.97	0.19	0.65
168	0.24	1.67	0.26	0.69
169	0.28	1.97	0.23	0.64
170	0.53	1.49	0.34	0.82
171	0.35	1.46	0.37	0.83
172	0.44	1.59	0.32	0.77
173	0.57	1.46	0.38	0.85
174	0.41	1.70	0.24	0.75
175	0.47	1.54	0.37	0.83
176	0.34	2.23	0.16	0.54
177	0.43	1.57	0.34	0.76
178	0.48	1.83	0.22	0.75
179	0.45	1.39	0.42	0.87

Measures of Compactness Report

GA House Illustrative

Number of cut edges: 22,359

	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
Sum	N/A	N/A	N/A	N/A
Min	0.12	1.23	0.10	0.46
Max	0.66	2.98	0.59	0.91
Mean	0.39	1.81	0.28	0.72
Std. Dev.	0.11	0.33	0.10	0.10
District	Reock	Schwartzberg	Polsby-Popper	Area/Convex Hull
180	0.61	1.23	0.40	0.85

Measures of Compactness Report

GA House Illustrative

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Schwartzberg	The measure is usually greater than or equal to 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.
Area / Convex Hull	The measure is always between 0 and 1, with 1 being the most compact.
Cut Edges	A smaller number implies a more compact plan. The measure should only be used to compare plans defined on the same base layer.

Divisions of counties and precincts (VTDs):

Below is the political subdivisions splits report for the House enacted plan.

Related note: The first page of the following report generated by *Maptitude for Redistricting* software reports a total number of Voting District (VTD) “subdivisions split in to more than one district,” namely 184. However, the “Split Counts” “Voting District” section of the report indicates that “[c]ases where an area is split among 2 Districts” total 175, and “[c]ases where an area is split among 3 Districts” total 10—and the total of 175 and 10 equals 185, not 184. In correspondence with Caliper Corporation (the company that produces *Maptitude for Redistricting*), I have verified that 185 is the correct total, hence that is the number provided in the summary table in section IV.C. of the expert report, not 184.

User:

Plan Name: **GA House Enacted**

Plan Type:

Political Subdivision Splits Between Districts

Saturday, December 3, 2022

10:53 PM

Number of subdivisions not split:

County	90
Voting District	2,514

Number of subdivisions split into more than one district:

County	69
Voting District	184

Number of splits involving no population:

County	0
Voting District	16

Split Counts

County

Cases where an area is split among 2 Districts: 34
 Cases where an area is split among 3 Districts: 9
 Cases where an area is split among 4 Districts: 12
 Cases where an area is split among 5 Districts: 4
 Cases where an area is split among 6 Districts: 3
 Cases where an area is split among 7 Districts: 2
 Cases where an area is split among 9 Districts: 1
 Cases where an area is split among 14 Districts: 1
 Cases where an area is split among 17 Districts: 1
 Cases where an area is split among 21 Districts: 1
 Cases where an area is split among 22 Districts: 1

Voting District

Cases where an area is split among 2 Districts: 175
 Cases where an area is split among 3 Districts: 10

County	Voting District	District	Population
<i>Split Counties:</i>			
Appling GA		157	12,825
Appling GA		178	5,619
Baldwin GA		128	5,158
Baldwin GA		133	38,641
Barrow GA		104	24,245
Barrow GA		119	54,736
Barrow GA		120	4,524
Bartow GA		14	49,688
Bartow GA		15	59,213
Ben Hill GA		148	5,115
Ben Hill GA		156	12,079
Bibb GA		142	59,608
Bibb GA		143	59,469
Bibb GA		144	33,948

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Bibb GA		145	4,321
Bryan GA		160	11,008
Bryan GA		164	21,420
Bryan GA		166	12,310
Bulloch GA		158	19,285
Bulloch GA		159	12,887
Bulloch GA		160	48,927
Carroll GA		18	18,789
Carroll GA		70	2,854
Carroll GA		71	59,538
Carroll GA		72	37,967
Catoosa GA		2	7,673
Catoosa GA		3	60,199
Chatham GA		161	28,269
Chatham GA		162	60,308
Chatham GA		163	60,123
Chatham GA		164	38,681
Chatham GA		165	59,978
Chatham GA		166	47,932
Cherokee GA		11	6,557
Cherokee GA		14	9,447
Cherokee GA		20	60,107
Cherokee GA		21	59,529
Cherokee GA		22	30,874
Cherokee GA		23	59,048
Cherokee GA		44	21,989
Cherokee GA		46	15,178
Cherokee GA		47	3,891
Clarke GA		120	30,095
Clarke GA		121	26,478
Clarke GA		122	59,632
Clarke GA		124	12,466
Clayton GA		75	59,743
Clayton GA		76	59,759
Clayton GA		77	59,242
Clayton GA		78	55,197
Clayton GA		79	59,500
Clayton GA		116	4,154
Cobb GA		22	28,586
Cobb GA		34	59,875
Cobb GA		35	59,889
Cobb GA		36	59,994
Cobb GA		37	59,176
Cobb GA		38	59,317
Cobb GA		39	59,381
Cobb GA		40	59,044
Cobb GA		41	60,122

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Cobb GA		42	59,620
Cobb GA		43	59,464
Cobb GA		44	38,013
Cobb GA		45	59,738
Cobb GA		46	43,930
Coffee GA		169	33,736
Coffee GA		176	9,356
Columbia GA		123	2,205
Columbia GA		125	55,389
Columbia GA		127	39,526
Columbia GA		131	58,890
Cook GA		170	7,342
Cook GA		172	9,887
Coweta GA		65	13,008
Coweta GA		67	17,272
Coweta GA		70	56,267
Coweta GA		73	31,608
Coweta GA		136	28,003
Dawson GA		7	2,409
Dawson GA		9	24,389
DeKalb GA		52	28,300
DeKalb GA		80	59,461
DeKalb GA		81	59,007
DeKalb GA		82	59,724
DeKalb GA		83	59,416
DeKalb GA		84	59,862
DeKalb GA		85	59,373
DeKalb GA		86	59,205
DeKalb GA		87	59,709
DeKalb GA		88	47,844
DeKalb GA		89	59,866
DeKalb GA		90	59,812
DeKalb GA		91	19,700
DeKalb GA		92	15,607
DeKalb GA		93	11,690
DeKalb GA		94	31,207
DeKalb GA		95	14,599
Dougherty GA		151	6,268
Dougherty GA		152	6,187
Dougherty GA		153	59,299
Dougherty GA		154	14,036
Douglas GA		61	30,206
Douglas GA		64	35,576
Douglas GA		65	19,408
Douglas GA		66	59,047
Effingham GA		159	32,941
Effingham GA		161	31,828

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Fayette GA		68	29,719
Fayette GA		69	37,303
Fayette GA		73	28,428
Fayette GA		74	23,744
Floyd GA		5	5,099
Floyd GA		12	34,335
Floyd GA		13	59,150
Forsyth GA		11	19,019
Forsyth GA		24	59,011
Forsyth GA		25	46,134
Forsyth GA		26	59,248
Forsyth GA		28	50,864
Forsyth GA		100	17,007
Fulton GA		25	13,280
Fulton GA		47	55,235
Fulton GA		48	43,976
Fulton GA		49	59,153
Fulton GA		50	59,523
Fulton GA		51	58,952
Fulton GA		52	31,511
Fulton GA		53	59,953
Fulton GA		54	60,083
Fulton GA		55	59,971
Fulton GA		56	58,929
Fulton GA		57	59,969
Fulton GA		58	59,057
Fulton GA		59	59,434
Fulton GA		60	59,709
Fulton GA		61	29,096
Fulton GA		62	59,450
Fulton GA		63	59,381
Fulton GA		65	27,048
Fulton GA		67	41,863
Fulton GA		68	29,758
Fulton GA		69	21,379
Glynn GA		167	20,499
Glynn GA		179	59,356
Glynn GA		180	4,644
Gordon GA		5	53,738
Gordon GA		6	3,806
Grady GA		171	8,115
Grady GA		173	18,121
Gwinnett GA		30	8,620
Gwinnett GA		48	15,027
Gwinnett GA		88	11,845
Gwinnett GA		94	28,004
Gwinnett GA		95	34,221

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Gwinnett GA		96	59,515
Gwinnett GA		97	59,072
Gwinnett GA		98	59,998
Gwinnett GA		99	59,850
Gwinnett GA		100	35,204
Gwinnett GA		101	59,938
Gwinnett GA		102	58,959
Gwinnett GA		103	51,691
Gwinnett GA		104	35,117
Gwinnett GA		105	59,344
Gwinnett GA		106	59,112
Gwinnett GA		107	59,702
Gwinnett GA		108	59,577
Gwinnett GA		109	59,630
Gwinnett GA		110	59,951
Gwinnett GA		111	22,685
Habersham GA		10	42,636
Habersham GA		32	3,395
Hall GA		27	54,508
Hall GA		28	8,108
Hall GA		29	59,200
Hall GA		30	50,646
Hall GA		31	14,349
Hall GA		100	7,819
Hall GA		103	8,506
Harris GA		138	21,634
Harris GA		139	13,034
Henry GA		74	18,397
Henry GA		78	3,847
Henry GA		91	35,569
Henry GA		115	60,174
Henry GA		116	55,759
Henry GA		117	54,737
Henry GA		118	12,229
Houston GA		145	28,132
Houston GA		146	60,203
Houston GA		147	59,178
Houston GA		148	16,120
Jackson GA		31	45,552
Jackson GA		32	10,931
Jackson GA		119	4,211
Jackson GA		120	15,213
Jasper GA		114	2,855
Jasper GA		118	11,733
Jones GA		133	20,561
Jones GA		144	7,786
Lamar GA		134	5,026

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Lamar GA		135	13,474
Liberty GA		167	5,109
Liberty GA		168	60,147
Lowndes GA		174	9,770
Lowndes GA		175	43,692
Lowndes GA		176	4,797
Lowndes GA		177	59,992
Lumpkin GA		9	29,201
Lumpkin GA		27	4,287
Madison GA		33	9,935
Madison GA		123	20,185
McDuffie GA		125	4,748
McDuffie GA		128	16,884
Meriwether GA		136	13,382
Meriwether GA		137	7,231
Monroe GA		134	9,272
Monroe GA		144	17,498
Monroe GA		145	1,187
Muscogee GA		137	30,443
Muscogee GA		138	12,190
Muscogee GA		139	45,976
Muscogee GA		140	59,294
Muscogee GA		141	59,019
Newton GA		93	15,515
Newton GA		113	60,053
Newton GA		114	36,915
Oconee GA		120	9,150
Oconee GA		121	32,649
Paulding GA		16	16,549
Paulding GA		17	59,120
Paulding GA		18	10,627
Paulding GA		19	58,955
Paulding GA		64	23,410
Peach GA		145	14,093
Peach GA		150	13,888
Putnam GA		118	10,591
Putnam GA		124	11,456
Richmond GA		126	25,990
Richmond GA		127	19,152
Richmond GA		129	58,829
Richmond GA		130	59,203
Richmond GA		132	43,433
Rockdale GA		91	4,781
Rockdale GA		92	44,666
Rockdale GA		93	32,913
Rockdale GA		95	11,210
Spalding GA		74	16,815

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Spalding GA		117	5,393
Spalding GA		134	45,098
Sumter GA		150	14,282
Sumter GA		151	15,334
Tattnall GA		156	1,263
Tattnall GA		157	21,579
Telfair GA		149	9,486
Telfair GA		156	2,991
Thomas GA		172	4,176
Thomas GA		173	41,622
Tift GA		169	6,730
Tift GA		170	34,614
Troup GA		72	10,281
Troup GA		136	17,913
Troup GA		137	16,144
Troup GA		138	25,088
Walker GA		1	43,415
Walker GA		2	24,239
Walton GA		111	37,324
Walton GA		112	59,349
Ware GA		174	9,097
Ware GA		176	27,154
Wayne GA		167	6,742
Wayne GA		178	23,402
White GA		8	22,119
White GA		9	5,884
Whitfield GA		2	27,861
Whitfield GA		4	59,070
Whitfield GA		6	15,933
<i>Split VTDs:</i>			
Barrow GA	16	104	1,708
Barrow GA	16	119	8,060
Bartow GA	CASSVILLE	14	15,558
Bartow GA	CASSVILLE	15	1,047
Bartow GA	WHITE	14	3,335
Bartow GA	WHITE	15	211
Ben Hill GA	WEST	148	5,115
Ben Hill GA	WEST	156	5,229
Bibb GA	HOWARD 1	142	2,326
Bibb GA	HOWARD 1	144	3,617
Bibb GA	HOWARD 2	142	2,369
Bibb GA	HOWARD 2	144	3,076
Bibb GA	HOWARD 3	142	0
Bibb GA	HOWARD 3	144	12,654
Bibb GA	WARRIOR 2	142	4,426
Bibb GA	WARRIOR 2	145	852
Bryan GA	DANIELSIDING	164	1,268

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Bryan GA	DANIELSIDING	166	1,741
Bryan GA	HWY 144 EAST	164	4,552
Bryan GA	HWY 144 EAST	166	4,707
Bryan GA	J.F.GREGORY PARK	164	3,489
Bryan GA	J.F.GREGORY PARK	166	144
Bulloch GA	CHURCH	158	3,764
Bulloch GA	CHURCH	159	5,869
Carroll GA	BONNER	71	410
Carroll GA	BONNER	72	5,554
Chatham GA	CRUSADER COMMUNITY CENTER	162	2,134
Chatham GA	CRUSADER COMMUNITY CENTER	166	1,493
Chatham GA	GEORGETOWN ELEMENTAR	164	5,562
Chatham GA	GEORGETOWN ELEMENTAR	166	0
Chatham GA	GRACE UNITED METHODIST CHURCH	163	2,064
Chatham GA	GRACE UNITED METHODIST CHURCH	165	397
Chatham GA	ROTHWELL BAPTIST CHURCH	161	5,335
Chatham GA	ROTHWELL BAPTIST CHURCH	164	4,987
Chatham GA	THE LIGHT CHURCH	162	1,177
Chatham GA	THE LIGHT CHURCH	163	1,109
Chatham GA	WINDSOR FOREST BAPTIST CHURCH SCHOOL	163	785
Chatham GA	WINDSOR FOREST BAPTIST CHURCH SCHOOL	166	1,890
Cherokee GA	CARMEL	20	5,626
Cherokee GA	CARMEL	22	1,222
Cherokee GA	CARMEL	44	0
Cherokee GA	FREEHOME	21	3,200
Cherokee GA	FREEHOME	47	3,891
Cherokee GA	HOLLY SPRINGS	21	2,250
Cherokee GA	HOLLY SPRINGS	23	2,578
Clarke GA	1A	122	2,758
Clarke GA	1A	124	2,286
Clarke GA	4B	121	7,082
Clarke GA	4B	122	5,589
Clarke GA	7C	120	1,922
Clarke GA	7C	121	3,184
Clayton GA	LOVEJOY 1	75	5,018
Clayton GA	LOVEJOY 1	78	601

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Clayton GA	LOVEJOY 3	78	9,099
Clayton GA	LOVEJOY 3	116	4,154
Clayton GA	MORROW 4	76	1,911
Clayton GA	MORROW 4	78	1,316
Cobb GA	Acworth 1B	35	7,322
Cobb GA	Acworth 1B	36	142
Cobb GA	Baker 01	22	5,226
Cobb GA	Baker 01	35	1,996
Cobb GA	Bells Ferry 03	22	4,918
Cobb GA	Bells Ferry 03	44	3,763
Cobb GA	Dobbins 01	42	11,055
Cobb GA	Dobbins 01	43	2,346
Cobb GA	Elizabeth 01	34	700
Cobb GA	Elizabeth 01	37	5,170
Cobb GA	Elizabeth 04	37	2,031
Cobb GA	Elizabeth 04	43	2,387
Cobb GA	Kennesaw 1A	22	599
Cobb GA	Kennesaw 1A	35	3,844
Cobb GA	Kennesaw 3A	22	0
Cobb GA	Kennesaw 3A	34	871
Cobb GA	Kennesaw 3A	35	8,631
Cobb GA	Lassiter 01	44	2,121
Cobb GA	Lassiter 01	46	2,600
Cobb GA	Lindley 01	39	5,678
Cobb GA	Lindley 01	40	582
Cobb GA	Mableton 01	38	1,589
Cobb GA	Mableton 01	39	5,513
Cobb GA	Mableton 02	38	256
Cobb GA	Mableton 02	39	5,427
Cobb GA	Marietta 1A	37	3,349
Cobb GA	Marietta 1A	43	6,645
Cobb GA	Marietta 2A	34	1,664
Cobb GA	Marietta 2A	37	811
Cobb GA	Marietta 5A	37	2,877
Cobb GA	Marietta 5A	43	1,457
Cobb GA	Marietta 6A	37	1,532
Cobb GA	Marietta 6A	43	3,022
Cobb GA	Marietta 7A	42	1,494
Cobb GA	Marietta 7A	43	5,417
Cobb GA	North Cobb 01	35	2,611
Cobb GA	North Cobb 01	36	559
Cobb GA	Norton Park 01	41	1,955
Cobb GA	Norton Park 01	42	5,846
Cobb GA	Oregon 03	37	6,683
Cobb GA	Oregon 03	41	6,305
Cobb GA	Pine Mountain 02	34	3,976
Cobb GA	Pine Mountain 02	35	0

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Cobb GA	Smyrna 1A	40	1,292
Cobb GA	Smyrna 1A	42	5,341
Cobb GA	Smyrna 4A	40	6,599
Cobb GA	Smyrna 4A	42	1,609
Cobb GA	Smyrna 7A	39	905
Cobb GA	Smyrna 7A	40	7,690
Coffee GA	DOUGLAS	169	19,642
Coffee GA	DOUGLAS	176	8,929
Columbia GA	PATRIOTS PARK	125	326
Columbia GA	PATRIOTS PARK	131	5,958
Coweta GA	JEFFERSON PARKWAY	70	12,590
Coweta GA	JEFFERSON PARKWAY	73	1,521
DeKalb GA	Cedar Grove Middle	89	2,204
DeKalb GA	Cedar Grove Middle	90	316
DeKalb GA	Clarkston	85	5,454
DeKalb GA	Clarkston	86	9,300
DeKalb GA	Dresden Elem (CHA)	81	5,398
DeKalb GA	Dresden Elem (CHA)	83	7,691
DeKalb GA	Freedom Middle	86	1,002
DeKalb GA	Freedom Middle	87	3,088
DeKalb GA	Glennwood (DEC)	82	2,059
DeKalb GA	Glennwood (DEC)	84	1,221
DeKalb GA	Glenwood Road	85	1,698
DeKalb GA	Glenwood Road	86	1,064
DeKalb GA	Memorial South	86	2,226
DeKalb GA	Memorial South	87	2,547
DeKalb GA	Panola Road	86	3,296
DeKalb GA	Panola Road	94	460
DeKalb GA	Redan Middle	87	1,419
DeKalb GA	Redan Middle	88	1,633
DeKalb GA	Rockbridge Road	94	3,736
DeKalb GA	Rockbridge Road	95	1,104
DeKalb GA	Snapfinger Road South	84	920
DeKalb GA	Snapfinger Road South	91	1,271
DeKalb GA	Stone Mill Elem	87	1,863
DeKalb GA	Stone Mill Elem	88	4,069
DeKalb GA	Stone Mountain Champion (STO)	87	1,338
DeKalb GA	Stone Mountain Champion (STO)	88	2,865
DeKalb GA	Stone Mountain Middle (TUC)	87	656
DeKalb GA	Stone Mountain Middle (TUC)	88	3,960
DeKalb GA	Tucker Library (TUC)	81	2,394
DeKalb GA	Tucker Library (TUC)	88	1,635
Dougherty GA	DARTON COLLEGE	151	4,018
Dougherty GA	DARTON COLLEGE	153	2,465

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Dougherty GA	MT ZION CENTER	153	1,245
Dougherty GA	MT ZION CENTER	154	3,972
Effingham GA	4B	159	1,960
Effingham GA	4B	161	959
Fayette GA	ABERDEEN	68	983
Fayette GA	ABERDEEN	73	1,392
Fayette GA	BRAELINN	73	605
Fayette GA	BRAELINN	74	1,646
Fayette GA	STARRSMILL	73	1,932
Fayette GA	STARRSMILL	74	2,452
Floyd GA	ALTO PARK	12	1,576
Floyd GA	ALTO PARK	13	3,847
Floyd GA	MT ALTO NORTH	12	1,080
Floyd GA	MT ALTO NORTH	13	4,509
Forsyth GA	BROWNS BRIDGE	26	10,116
Forsyth GA	BROWNS BRIDGE	28	2,801
Forsyth GA	CONCORD	11	7,687
Forsyth GA	CONCORD	28	7,982
Forsyth GA	CUMMING	26	4,666
Forsyth GA	CUMMING	28	2,410
Forsyth GA	HEARDSVILLE	11	11,332
Forsyth GA	HEARDSVILLE	24	1,335
Forsyth GA	HEARDSVILLE	28	333
Forsyth GA	OTWELL	24	3,988
Forsyth GA	OTWELL	26	6,597
Forsyth GA	OTWELL	28	7,875
Forsyth GA	POLO	24	9,868
Forsyth GA	POLO	25	0
Forsyth GA	POLO	26	15,990
Forsyth GA	SOUTH FORSYTH	25	10,064
Forsyth GA	SOUTH FORSYTH	100	11,887
Forsyth GA	WINDERMERE	26	11,718
Forsyth GA	WINDERMERE	100	5,120
Fulton GA	08C	53	1,524
Fulton GA	08C	60	335
Fulton GA	09K	55	3,033
Fulton GA	09K	60	4,105
Fulton GA	10D	55	1,756
Fulton GA	10D	60	4,311
Fulton GA	11C	55	340
Fulton GA	11C	60	3,418
Fulton GA	AP022	48	862
Fulton GA	AP022	49	2,505
Fulton GA	AP07B	47	1,250
Fulton GA	AP07B	49	1,304
Fulton GA	AP14	48	4,109
Fulton GA	AP14	49	281

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Fulton GA	EP01B	59	2,393
Fulton GA	EP01B	62	2,049
Fulton GA	JC19	48	3,608
Fulton GA	JC19	51	1,792
Fulton GA	ML012	47	501
Fulton GA	ML012	49	123
Fulton GA	ML01B	47	284
Fulton GA	ML01B	49	61
Fulton GA	RW03	51	1,292
Fulton GA	RW03	53	6,066
Fulton GA	RW09	47	2,971
Fulton GA	RW09	49	4,750
Fulton GA	SC02	60	220
Fulton GA	SC02	61	773
Fulton GA	SC05B	61	1,575
Fulton GA	SC05B	65	2,978
Fulton GA	SC07A	65	1,028
Fulton GA	SC07A	67	7,728
Fulton GA	SC08B	62	92
Fulton GA	SC08B	68	5,255
Fulton GA	SC13	65	2,858
Fulton GA	SC13	67	1,176
Fulton GA	UC02A	65	1,070
Fulton GA	UC02A	67	13,013
Gwinnett GA	BAYCREEK A	106	934
Gwinnett GA	BAYCREEK A	110	2,651
Gwinnett GA	BAYCREEK D	102	3,729
Gwinnett GA	BAYCREEK D	110	2,597
Gwinnett GA	BERKSHIRE H	98	2,475
Gwinnett GA	BERKSHIRE H	108	1,991
Gwinnett GA	CATES J	94	955
Gwinnett GA	CATES J	108	4,255
Gwinnett GA	DULUTH F	96	7,245
Gwinnett GA	DULUTH F	107	5,149
Gwinnett GA	DULUTH G	96	1,426
Gwinnett GA	DULUTH G	99	3,389
Gwinnett GA	DUNCANS D	30	8,620
Gwinnett GA	DUNCANS D	104	1,575
Gwinnett GA	LAWRENCEVILLE F	102	2,073
Gwinnett GA	LAWRENCEVILLE F	105	3,924
Gwinnett GA	LAWRENCEVILLE M	102	4,231
Gwinnett GA	LAWRENCEVILLE M	105	7,770
Gwinnett GA	MARTINS H	107	8,164
Gwinnett GA	MARTINS H	109	892
Gwinnett GA	PINCKNEYVILLE W	96	5,745
Gwinnett GA	PINCKNEYVILLE W	97	2,561
Gwinnett GA	PUCKETTS E	103	1,506

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Gwinnett GA	PUCKETTS E	105	7,421
Gwinnett GA	SUGAR HILL D	100	2,158
Gwinnett GA	SUGAR HILL D	103	6,421
Gwinnett GA	SUWANEE F	99	3,224
Gwinnett GA	SUWANEE F	103	2,836
Habersham GA	HABERSHAM SOUTH	10	8,687
Habersham GA	HABERSHAM SOUTH	32	1,972
Hall GA	WILSON	28	3,803
Hall GA	WILSON	29	4,979
Henry GA	FLIPPEN	115	0
Henry GA	FLIPPEN	116	5,686
Henry GA	HICKORY FLAT	115	7,135
Henry GA	HICKORY FLAT	116	17
Henry GA	LOWES	116	5,233
Henry GA	LOWES	117	8,688
Henry GA	RED OAK	78	3,847
Henry GA	RED OAK	116	3,999
Henry GA	STOCKBRIDGE CENTRAL	78	0
Henry GA	STOCKBRIDGE CENTRAL	91	7,453
Henry GA	SWAN LAKE	91	3,240
Henry GA	SWAN LAKE	115	1,518
Houston GA	CENT	145	69
Houston GA	CENT	147	11,815
Houston GA	FMMS	146	9,734
Houston GA	FMMS	147	3,595
Houston GA	HHPC	145	8,748
Houston GA	HHPC	147	6,643
Houston GA	MCMS	146	3,947
Houston GA	MCMS	147	9,547
Houston GA	RECR	145	15,867
Houston GA	RECR	146	0
Houston GA	RECR	147	1,931
Houston GA	ROZR	146	13,202
Houston GA	ROZR	148	7,640
Houston GA	VHS	146	5,586
Houston GA	VHS	148	4,039
Jackson GA	North Jackson	31	4,513
Jackson GA	North Jackson	32	10,931
Jackson GA	North Jackson	120	3,803
Jackson GA	West Jackson	31	16,656
Jackson GA	West Jackson	119	4,211
Jones GA	CLINTON	133	384
Jones GA	CLINTON	144	2,481
Lamar GA	MILNER	134	3,043
Lamar GA	MILNER	135	2,725
Liberty GA	BUTTON GWINNETT	167	5,109
Liberty GA	BUTTON GWINNETT	168	4,344

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Lowndes GA	NORTHSIDE	175	8,373
Lowndes GA	NORTHSIDE	177	37,217
Lowndes GA	RAINWATER	175	6,400
Lowndes GA	RAINWATER	177	8,754
Lowndes GA	S LOWNDES	174	1,951
Lowndes GA	S LOWNDES	175	3,755
Lowndes GA	TRINITY	175	9,620
Lowndes GA	TRINITY	176	4,797
Lowndes GA	TRINITY	177	6,930
Lumpkin GA	DAHLONEGA	9	29,201
Lumpkin GA	DAHLONEGA	27	4,287
Muscogee GA	CUSSETA RD	140	5,391
Muscogee GA	CUSSETA RD	141	5,010
Muscogee GA	EPWORTH UMC	139	3,363
Muscogee GA	EPWORTH UMC	140	4,560
Muscogee GA	FORT/WADDELL	137	5,599
Muscogee GA	FORT/WADDELL	141	6,645
Muscogee GA	OUR LADY OF LOURDES	140	13,744
Muscogee GA	OUR LADY OF LOURDES	141	32
Muscogee GA	ROTHSCHILD	137	8,327
Muscogee GA	ROTHSCHILD	141	3,143
Muscogee GA	ST ANDREWS/MIDLAND	139	5,899
Muscogee GA	ST ANDREWS/MIDLAND	141	5,582
Newton GA	CEDAR SHOALS	93	1,206
Newton GA	CEDAR SHOALS	113	3,687
Newton GA	FAIRVIEW	93	856
Newton GA	FAIRVIEW	113	3,443
Newton GA	TOWN	93	1,668
Newton GA	TOWN	113	5,075
Paulding GA	AUSTIN MIDDLE SCHOOL	18	916
Paulding GA	AUSTIN MIDDLE SCHOOL	64	9,977
Paulding GA	BURNT HICKORY PARK	16	8,392
Paulding GA	BURNT HICKORY PARK	17	16
Paulding GA	CARL SCOGGINS MID SC	17	517
Paulding GA	CARL SCOGGINS MID SC	18	7,991
Paulding GA	CARL SCOGGINS MID SC	19	1,240
Paulding GA	HIRAM HIGH SCHOOL	17	0
Paulding GA	HIRAM HIGH SCHOOL	19	16,110
Paulding GA	SARA RAGSDALE ELM SC	17	5,972
Paulding GA	SARA RAGSDALE ELM SC	18	1,720
Paulding GA	SHELTON ELEMENTARY SCHOOL	16	8,152
Paulding GA	SHELTON ELEMENTARY SCHOOL	17	12,810
Paulding GA	SHELTON ELEMENTARY SCHOOL	19	5,455
Paulding GA	WATSON GOVERNMENT COMPLEX	16	5

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Paulding GA	WATSON GOVERNMENT COMPLEX	17	17,525
Richmond GA	109	129	954
Richmond GA	109	130	886
Richmond GA	301	127	2,362
Richmond GA	301	129	894
Richmond GA	402	126	0
Richmond GA	402	132	9,711
Richmond GA	503	129	3,260
Richmond GA	503	132	2,535
Richmond GA	702	127	586
Richmond GA	702	129	2,007
Richmond GA	703	127	1,164
Richmond GA	703	129	6,148
Richmond GA	803	126	0
Richmond GA	803	132	2,432
Richmond GA	807	126	2,403
Richmond GA	807	132	0
Rockdale GA	MILSTEAD	93	6,444
Rockdale GA	MILSTEAD	95	0
Rockdale GA	OLD TOWNE	93	10,095
Rockdale GA	OLD TOWNE	95	872
Rockdale GA	ROCKDALE	92	6,218
Rockdale GA	ROCKDALE	93	79
Spalding GA	CARVER FIRE STATION	74	235
Spalding GA	CARVER FIRE STATION	134	2,835
Spalding GA	GARY REID FIRE STATION	74	2,075
Spalding GA	GARY REID FIRE STATION	134	4,817
Spalding GA	UGA CAMPUS	74	787
Spalding GA	UGA CAMPUS	134	5,290
Sumter GA	GSW CONF CENTER	150	4,568
Sumter GA	GSW CONF CENTER	151	1,549
Sumter GA	REES PARK	150	5,179
Sumter GA	REES PARK	151	447
Troup GA	MOUNTVILLE	136	2,068
Troup GA	MOUNTVILLE	137	497
Walton GA	BROKEN ARROW	111	2,993
Walton GA	BROKEN ARROW	112	3,003
Ware GA	100	174	2,672
Ware GA	100	176	3,692
Ware GA	200A	174	0
Ware GA	200A	176	4,133
Ware GA	304	174	0
Ware GA	304	176	2,107
Ware GA	400	174	2,506
Ware GA	400	176	2,526
Wayne GA	OGLETHORPE	167	1,928

Political Subdivision Splits Between Districts

GA House Enacted

County	Voting District	District	Population
Wayne GA	OGLETHORPE	178	637
Whitfield GA	2A	2	3,864
Whitfield GA	2A	4	1,000
Whitfield GA	PLEASANT GROVE	2	6,210
Whitfield GA	PLEASANT GROVE	6	2,122

Below is the political subdivisions splits report for the House illustrative plan.

Related note: The first page of the following report generated by *Maptitude for Redistricting* software reports a total number of Voting District (VTD) “subdivisions split in to more than one district,” namely 185. However, the “Split Counts” “Voting District” section of the report indicates that “[c]ases where an area is split among 2 Districts” total 175, and “[c]ases where an area is split among 3 Districts” total 11—and the total of 175 and 11 equals 186, not 185. Based on my correspondence with Caliper Corporation described above, I have reported 186 as the correct total in the summary table in section IV.C. of the report, not 185.

User:

Plan Name: **GA House Illustrative**

Plan Type:

Political Subdivision Splits Between Districts

Saturday, December 3, 2022

10:06 PM

Number of subdivisions not split:

County	89
Voting District	2,513

Number of subdivisions split into more than one district:

County	70
Voting District	185

Number of splits involving no population:

County	0
Voting District	13

Split Counts

County

Cases where an area is split among 2 Districts: 35
 Cases where an area is split among 3 Districts: 9
 Cases where an area is split among 4 Districts: 12
 Cases where an area is split among 5 Districts: 4
 Cases where an area is split among 6 Districts: 2
 Cases where an area is split among 7 Districts: 3
 Cases where an area is split among 9 Districts: 1
 Cases where an area is split among 14 Districts: 1
 Cases where an area is split among 17 Districts: 1
 Cases where an area is split among 21 Districts: 1
 Cases where an area is split among 23 Districts: 1

Voting District

Cases where an area is split among 2 Districts: 175
 Cases where an area is split among 3 Districts: 11

County	Voting District	District	Population
<i>Split Counties:</i>			
Appling GA		157	12,825
Appling GA		178	5,619
Baldwin GA		128	5,158
Baldwin GA		133	12,336
Baldwin GA		149	26,305
Barrow GA		104	24,245
Barrow GA		119	54,736
Barrow GA		120	4,524
Bartow GA		14	49,688
Bartow GA		15	59,213
Ben Hill GA		148	5,115
Ben Hill GA		156	12,079
Bibb GA		142	59,320
Bibb GA		143	59,122

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Bibb GA		145	22,716
Bibb GA		149	16,188
Bryan GA		160	11,008
Bryan GA		164	21,420
Bryan GA		166	12,310
Bulloch GA		158	19,285
Bulloch GA		159	12,887
Bulloch GA		160	48,927
Carroll GA		18	18,789
Carroll GA		70	2,854
Carroll GA		71	59,538
Carroll GA		72	37,967
Catoosa GA		2	7,673
Catoosa GA		3	60,199
Chatham GA		161	28,269
Chatham GA		162	60,308
Chatham GA		163	60,123
Chatham GA		164	38,681
Chatham GA		165	59,978
Chatham GA		166	47,932
Cherokee GA		11	6,557
Cherokee GA		14	9,447
Cherokee GA		20	60,107
Cherokee GA		21	59,529
Cherokee GA		22	30,874
Cherokee GA		23	59,048
Cherokee GA		44	21,989
Cherokee GA		46	15,178
Cherokee GA		47	3,891
Clarke GA		120	30,095
Clarke GA		121	26,478
Clarke GA		122	59,632
Clarke GA		124	12,466
Clayton GA		74	34,350
Clayton GA		75	55,912
Clayton GA		76	59,759
Clayton GA		77	59,242
Clayton GA		78	24,678
Clayton GA		79	59,500
Clayton GA		116	4,154
Cobb GA		22	28,586
Cobb GA		34	59,875
Cobb GA		35	59,889
Cobb GA		36	59,994
Cobb GA		37	59,176
Cobb GA		38	59,317
Cobb GA		39	59,381

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Cobb GA		40	59,044
Cobb GA		41	60,122
Cobb GA		42	59,620
Cobb GA		43	59,464
Cobb GA		44	38,013
Cobb GA		45	59,738
Cobb GA		46	43,930
Coffee GA		169	33,736
Coffee GA		176	9,356
Columbia GA		123	2,205
Columbia GA		125	55,389
Columbia GA		127	39,526
Columbia GA		131	58,890
Cook GA		170	7,342
Cook GA		172	9,887
Coweta GA		65	13,008
Coweta GA		67	17,272
Coweta GA		70	56,267
Coweta GA		73	31,608
Coweta GA		136	28,003
Dawson GA		7	2,409
Dawson GA		9	24,389
DeKalb GA		52	28,300
DeKalb GA		80	59,461
DeKalb GA		81	59,007
DeKalb GA		82	59,724
DeKalb GA		83	59,416
DeKalb GA		84	59,862
DeKalb GA		85	59,373
DeKalb GA		86	59,205
DeKalb GA		87	59,709
DeKalb GA		88	47,844
DeKalb GA		89	59,866
DeKalb GA		90	59,812
DeKalb GA		91	19,700
DeKalb GA		92	15,607
DeKalb GA		93	11,690
DeKalb GA		94	31,207
DeKalb GA		95	14,599
Dodge GA		148	18,550
Dodge GA		155	1,375
Dougherty GA		151	6,268
Dougherty GA		152	6,187
Dougherty GA		153	59,299
Dougherty GA		154	14,036
Douglas GA		61	48,764
Douglas GA		64	30,206

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Douglas GA		65	6,306
Douglas GA		66	58,961
Effingham GA		159	32,941
Effingham GA		161	31,828
Fayette GA		68	29,719
Fayette GA		69	36,979
Fayette GA		73	28,428
Fayette GA		74	24,068
Floyd GA		5	5,099
Floyd GA		12	34,335
Floyd GA		13	59,150
Forsyth GA		11	19,019
Forsyth GA		24	59,011
Forsyth GA		25	46,134
Forsyth GA		26	59,248
Forsyth GA		28	50,864
Forsyth GA		100	17,007
Fulton GA		25	13,280
Fulton GA		47	55,235
Fulton GA		48	43,976
Fulton GA		49	59,153
Fulton GA		50	59,523
Fulton GA		51	58,952
Fulton GA		52	31,511
Fulton GA		53	59,953
Fulton GA		54	60,083
Fulton GA		55	59,971
Fulton GA		56	58,929
Fulton GA		57	59,969
Fulton GA		58	59,057
Fulton GA		59	59,434
Fulton GA		60	59,709
Fulton GA		61	10,186
Fulton GA		62	59,450
Fulton GA		63	59,381
Fulton GA		64	6,032
Fulton GA		65	39,926
Fulton GA		67	41,863
Fulton GA		68	29,758
Fulton GA		69	21,379
Glynn GA		167	20,499
Glynn GA		179	59,356
Glynn GA		180	4,644
Gordon GA		5	53,738
Gordon GA		6	3,806
Grady GA		171	8,115
Grady GA		173	18,121

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Gwinnett GA		30	8,620
Gwinnett GA		48	15,027
Gwinnett GA		88	11,845
Gwinnett GA		94	28,004
Gwinnett GA		95	34,221
Gwinnett GA		96	59,515
Gwinnett GA		97	59,072
Gwinnett GA		98	59,998
Gwinnett GA		99	59,850
Gwinnett GA		100	35,204
Gwinnett GA		101	59,938
Gwinnett GA		102	58,959
Gwinnett GA		103	51,691
Gwinnett GA		104	35,117
Gwinnett GA		105	59,344
Gwinnett GA		106	59,112
Gwinnett GA		107	59,702
Gwinnett GA		108	59,577
Gwinnett GA		109	59,630
Gwinnett GA		110	59,951
Gwinnett GA		111	22,685
Habersham GA		10	42,636
Habersham GA		32	3,395
Hall GA		27	54,508
Hall GA		28	8,108
Hall GA		29	59,200
Hall GA		30	50,646
Hall GA		31	14,349
Hall GA		100	7,819
Hall GA		103	8,506
Harris GA		138	21,634
Harris GA		139	13,034
Henry GA		75	3,847
Henry GA		78	18,397
Henry GA		91	35,475
Henry GA		115	59,789
Henry GA		116	50,833
Henry GA		117	60,142
Henry GA		118	12,229
Houston GA		144	32,310
Houston GA		145	36,952
Houston GA		146	35,804
Houston GA		147	58,567
Jackson GA		31	45,552
Jackson GA		32	10,931
Jackson GA		119	4,211
Jackson GA		120	15,213

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Jasper GA		114	2,855
Jasper GA		118	11,733
Lamar GA		134	13,948
Lamar GA		135	4,552
Liberty GA		167	5,109
Liberty GA		168	60,147
Lowndes GA		174	9,770
Lowndes GA		175	43,692
Lowndes GA		176	4,797
Lowndes GA		177	59,992
Lumpkin GA		9	29,201
Lumpkin GA		27	4,287
Madison GA		33	9,935
Madison GA		123	20,185
McDuffie GA		125	4,748
McDuffie GA		128	16,884
Meriwether GA		136	13,382
Meriwether GA		137	7,231
Monroe GA		133	19,085
Monroe GA		135	8,872
Muscogee GA		137	30,443
Muscogee GA		138	12,190
Muscogee GA		139	45,976
Muscogee GA		140	59,294
Muscogee GA		141	59,019
Newton GA		93	15,515
Newton GA		113	60,053
Newton GA		114	36,915
Oconee GA		120	9,150
Oconee GA		121	32,649
Paulding GA		16	16,549
Paulding GA		17	59,120
Paulding GA		18	10,627
Paulding GA		19	58,955
Paulding GA		64	23,410
Peach GA		144	14,093
Peach GA		150	13,888
Putnam GA		118	10,591
Putnam GA		124	11,456
Richmond GA		126	25,990
Richmond GA		127	19,152
Richmond GA		129	58,829
Richmond GA		130	59,203
Richmond GA		132	43,433
Rockdale GA		91	4,781
Rockdale GA		92	44,666
Rockdale GA		93	32,913

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Rockdale GA		95	11,210
Spalding GA		78	16,815
Spalding GA		116	5,393
Spalding GA		134	45,098
Sumter GA		150	14,282
Sumter GA		151	15,334
Tattnall GA		156	1,263
Tattnall GA		157	21,579
Telfair GA		148	8,283
Telfair GA		156	4,194
Thomas GA		172	4,176
Thomas GA		173	41,622
Tift GA		169	6,730
Tift GA		170	34,614
Troup GA		72	10,281
Troup GA		136	17,913
Troup GA		137	16,144
Troup GA		138	25,088
Walker GA		1	43,415
Walker GA		2	24,239
Walton GA		111	37,324
Walton GA		112	59,349
Ware GA		174	9,097
Ware GA		176	27,154
Wayne GA		167	6,742
Wayne GA		178	23,402
White GA		8	22,119
White GA		9	5,884
Whitfield GA		2	27,861
Whitfield GA		4	59,070
Whitfield GA		6	15,933
Wilcox GA		146	955
Wilcox GA		148	7,811
<i>Split VTDs:</i>			
Baldwin GA	NORTH BALDWIN	133	4,245
Baldwin GA	NORTH BALDWIN	149	647
Baldwin GA	NORTH MILLEDGEVILLE	133	864
Baldwin GA	NORTH MILLEDGEVILLE	149	2,500
Baldwin GA	SOUTH MILLEDGEVILLE	133	932
Baldwin GA	SOUTH MILLEDGEVILLE	149	2,774
Barrow GA	16	104	1,708
Barrow GA	16	119	8,060
Bartow GA	CASSVILLE	14	15,558
Bartow GA	CASSVILLE	15	1,047
Bartow GA	WHITE	14	3,335
Bartow GA	WHITE	15	211
Ben Hill GA	WEST	148	5,115

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Ben Hill GA	WEST	156	5,229
Bibb GA	GODFREY 1	142	4,656
Bibb GA	GODFREY 1	149	6,278
Bibb GA	HOWARD 1	142	5,180
Bibb GA	HOWARD 1	143	763
Bibb GA	HOWARD 3	142	1,789
Bibb GA	HOWARD 3	143	10,865
Bibb GA	RUTLAND 1	142	1,475
Bibb GA	RUTLAND 1	145	6,465
Bibb GA	VINEVILLE 3	142	232
Bibb GA	VINEVILLE 3	143	4,182
Bryan GA	DANIELSIDING	164	1,268
Bryan GA	DANIELSIDING	166	1,741
Bryan GA	HWY 144 EAST	164	4,552
Bryan GA	HWY 144 EAST	166	4,707
Bryan GA	J.F.GREGORY PARK	164	3,489
Bryan GA	J.F.GREGORY PARK	166	144
Bulloch GA	CHURCH	158	3,764
Bulloch GA	CHURCH	159	5,869
Carroll GA	BONNER	71	410
Carroll GA	BONNER	72	5,554
Chatham GA	CRUSADER COMMUNITY CENTER	162	2,134
Chatham GA	CRUSADER COMMUNITY CENTER	166	1,493
Chatham GA	GEORGETOWN ELEMENTAR	164	5,562
Chatham GA	GEORGETOWN ELEMENTAR	166	0
Chatham GA	GRACE UNITED METHODIST CHURCH	163	2,064
Chatham GA	GRACE UNITED METHODIST CHURCH	165	397
Chatham GA	ROTHWELL BAPTIST CHURCH	161	5,335
Chatham GA	ROTHWELL BAPTIST CHURCH	164	4,987
Chatham GA	THE LIGHT CHURCH	162	1,177
Chatham GA	THE LIGHT CHURCH	163	1,109
Chatham GA	WINDSOR FOREST BAPTIST CHURCH SCHOOL	163	785
Chatham GA	WINDSOR FOREST BAPTIST CHURCH SCHOOL	166	1,890
Cherokee GA	CARMEL	20	5,626
Cherokee GA	CARMEL	22	1,222
Cherokee GA	CARMEL	44	0

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Cherokee GA	FREEHOME	21	3,200
Cherokee GA	FREEHOME	47	3,891
Cherokee GA	HOLLY SPRINGS	21	2,250
Cherokee GA	HOLLY SPRINGS	23	2,578
Clarke GA	1A	122	2,758
Clarke GA	1A	124	2,286
Clarke GA	4B	121	7,082
Clarke GA	4B	122	5,589
Clarke GA	7C	120	1,922
Clarke GA	7C	121	3,184
Clayton GA	JONESBORO 13	74	2,066
Clayton GA	JONESBORO 13	75	752
Clayton GA	JONESBORO 14	75	2,726
Clayton GA	JONESBORO 14	78	2,387
Clayton GA	JONESBORO 3	74	0
Clayton GA	JONESBORO 3	75	5,962
Clayton GA	LOVEJOY 1	74	4,484
Clayton GA	LOVEJOY 1	75	948
Clayton GA	LOVEJOY 1	78	187
Clayton GA	LOVEJOY 3	78	9,099
Clayton GA	LOVEJOY 3	116	4,154
Clayton GA	MORROW 4	75	1,316
Clayton GA	MORROW 4	76	1,911
Cobb GA	Acworth 1B	35	7,322
Cobb GA	Acworth 1B	36	142
Cobb GA	Baker 01	22	5,226
Cobb GA	Baker 01	35	1,996
Cobb GA	Bells Ferry 03	22	4,918
Cobb GA	Bells Ferry 03	44	3,763
Cobb GA	Dobbins 01	42	11,055
Cobb GA	Dobbins 01	43	2,346
Cobb GA	Elizabeth 01	34	700
Cobb GA	Elizabeth 01	37	5,170
Cobb GA	Elizabeth 04	37	2,031
Cobb GA	Elizabeth 04	43	2,387
Cobb GA	Kennesaw 1A	22	599
Cobb GA	Kennesaw 1A	35	3,844
Cobb GA	Kennesaw 3A	22	0
Cobb GA	Kennesaw 3A	34	871
Cobb GA	Kennesaw 3A	35	8,631
Cobb GA	Lassiter 01	44	2,121
Cobb GA	Lassiter 01	46	2,600
Cobb GA	Lindley 01	39	5,678
Cobb GA	Lindley 01	40	582
Cobb GA	Mableton 01	38	1,589
Cobb GA	Mableton 01	39	5,513
Cobb GA	Mableton 02	38	256

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Cobb GA	Mableton 02	39	5,427
Cobb GA	Marietta 1A	37	3,349
Cobb GA	Marietta 1A	43	6,645
Cobb GA	Marietta 2A	34	1,664
Cobb GA	Marietta 2A	37	811
Cobb GA	Marietta 5A	37	2,877
Cobb GA	Marietta 5A	43	1,457
Cobb GA	Marietta 6A	37	1,532
Cobb GA	Marietta 6A	43	3,022
Cobb GA	Marietta 7A	42	1,494
Cobb GA	Marietta 7A	43	5,417
Cobb GA	North Cobb 01	35	2,611
Cobb GA	North Cobb 01	36	559
Cobb GA	Norton Park 01	41	1,955
Cobb GA	Norton Park 01	42	5,846
Cobb GA	Oregon 03	37	6,683
Cobb GA	Oregon 03	41	6,305
Cobb GA	Pine Mountain 02	34	3,976
Cobb GA	Pine Mountain 02	35	0
Cobb GA	Smyrna 1A	40	1,292
Cobb GA	Smyrna 1A	42	5,341
Cobb GA	Smyrna 4A	40	6,599
Cobb GA	Smyrna 4A	42	1,609
Cobb GA	Smyrna 7A	39	905
Cobb GA	Smyrna 7A	40	7,690
Coffee GA	DOUGLAS	169	19,642
Coffee GA	DOUGLAS	176	8,929
Columbia GA	PATRIOTS PARK	125	326
Columbia GA	PATRIOTS PARK	131	5,958
Coweta GA	JEFFERSON PARKWAY	70	12,590
Coweta GA	JEFFERSON PARKWAY	73	1,521
DeKalb GA	Cedar Grove Middle	89	2,204
DeKalb GA	Cedar Grove Middle	90	316
DeKalb GA	Clarkston	85	5,454
DeKalb GA	Clarkston	86	9,300
DeKalb GA	Dresden Elem (CHA)	81	5,398
DeKalb GA	Dresden Elem (CHA)	83	7,691
DeKalb GA	Freedom Middle	86	1,002
DeKalb GA	Freedom Middle	87	3,088
DeKalb GA	Glennwood (DEC)	82	2,059
DeKalb GA	Glennwood (DEC)	84	1,221
DeKalb GA	Glenwood Road	85	1,698
DeKalb GA	Glenwood Road	86	1,064
DeKalb GA	Memorial South	86	2,226
DeKalb GA	Memorial South	87	2,547
DeKalb GA	Panola Road	86	3,296
DeKalb GA	Panola Road	94	460

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
DeKalb GA	Redan Middle	87	1,419
DeKalb GA	Redan Middle	88	1,633
DeKalb GA	Rockbridge Road	94	3,736
DeKalb GA	Rockbridge Road	95	1,104
DeKalb GA	Snapfinger Road South	84	920
DeKalb GA	Snapfinger Road South	91	1,271
DeKalb GA	Stone Mill Elem	87	1,863
DeKalb GA	Stone Mill Elem	88	4,069
DeKalb GA	Stone Mountain Champion (STO)	87	1,338
DeKalb GA	Stone Mountain Champion (STO)	88	2,865
DeKalb GA	Stone Mountain Middle (TUC)	87	656
DeKalb GA	Stone Mountain Middle (TUC)	88	3,960
DeKalb GA	Tucker Library (TUC)	81	2,394
DeKalb GA	Tucker Library (TUC)	88	1,635
Dougherty GA	DARTON COLLEGE	151	4,018
Dougherty GA	DARTON COLLEGE	153	2,465
Dougherty GA	MT ZION CENTER	153	1,245
Dougherty GA	MT ZION CENTER	154	3,972
Douglas GA	MIRROR LAKE ELEMENTA	61	5,093
Douglas GA	MIRROR LAKE ELEMENTA	66	3,661
Effingham GA	4B	159	1,960
Effingham GA	4B	161	959
Fayette GA	ABERDEEN	68	983
Fayette GA	ABERDEEN	73	1,392
Fayette GA	BANKS	69	1,812
Fayette GA	BANKS	74	247
Fayette GA	BRAELINN	73	605
Fayette GA	BRAELINN	74	1,646
Fayette GA	MURPHY	69	146
Fayette GA	MURPHY	74	3,848
Fayette GA	STARRSMILL	73	1,932
Fayette GA	STARRSMILL	74	2,452
Floyd GA	ALTO PARK	12	1,576
Floyd GA	ALTO PARK	13	3,847
Floyd GA	MT ALTO NORTH	12	1,080
Floyd GA	MT ALTO NORTH	13	4,509
Forsyth GA	BROWNS BRIDGE	26	10,116
Forsyth GA	BROWNS BRIDGE	28	2,801
Forsyth GA	CONCORD	11	7,687
Forsyth GA	CONCORD	28	7,982
Forsyth GA	CUMMING	26	4,666
Forsyth GA	CUMMING	28	2,410
Forsyth GA	HEARDSVILLE	11	11,332
Forsyth GA	HEARDSVILLE	24	1,335

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Forsyth GA	HEARDSVILLE	28	333
Forsyth GA	OTWELL	24	3,988
Forsyth GA	OTWELL	26	6,597
Forsyth GA	OTWELL	28	7,875
Forsyth GA	POLO	24	9,868
Forsyth GA	POLO	25	0
Forsyth GA	POLO	26	15,990
Forsyth GA	SOUTH FORSYTH	25	10,064
Forsyth GA	SOUTH FORSYTH	100	11,887
Forsyth GA	WINDERMERE	26	11,718
Forsyth GA	WINDERMERE	100	5,120
Fulton GA	08C	53	1,524
Fulton GA	08C	60	335
Fulton GA	09K	55	3,033
Fulton GA	09K	60	4,105
Fulton GA	10D	55	1,756
Fulton GA	10D	60	4,311
Fulton GA	11C	55	340
Fulton GA	11C	60	3,418
Fulton GA	AP022	48	862
Fulton GA	AP022	49	2,505
Fulton GA	AP07B	47	1,250
Fulton GA	AP07B	49	1,304
Fulton GA	AP14	48	4,109
Fulton GA	AP14	49	281
Fulton GA	EP01B	59	2,393
Fulton GA	EP01B	62	2,049
Fulton GA	JC19	48	3,608
Fulton GA	JC19	51	1,792
Fulton GA	ML012	47	501
Fulton GA	ML012	49	123
Fulton GA	ML01B	47	284
Fulton GA	ML01B	49	61
Fulton GA	RW03	51	1,292
Fulton GA	RW03	53	6,066
Fulton GA	RW09	47	2,971
Fulton GA	RW09	49	4,750
Fulton GA	SC02	60	220
Fulton GA	SC02	65	773
Fulton GA	SC07A	65	1,028
Fulton GA	SC07A	67	7,728
Fulton GA	SC08B	62	92
Fulton GA	SC08B	68	5,255
Fulton GA	SC13	61	589
Fulton GA	SC13	65	2,269
Fulton GA	SC13	67	1,176
Fulton GA	UC02A	65	1,070

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Fulton GA	UC02A	67	13,013
Gwinnett GA	BAYCREEK A	106	934
Gwinnett GA	BAYCREEK A	110	2,651
Gwinnett GA	BAYCREEK D	102	3,729
Gwinnett GA	BAYCREEK D	110	2,597
Gwinnett GA	BERKSHIRE H	98	2,475
Gwinnett GA	BERKSHIRE H	108	1,991
Gwinnett GA	CATES J	94	955
Gwinnett GA	CATES J	108	4,255
Gwinnett GA	DULUTH F	96	7,245
Gwinnett GA	DULUTH F	107	5,149
Gwinnett GA	DULUTH G	96	1,426
Gwinnett GA	DULUTH G	99	3,389
Gwinnett GA	DUNCANS D	30	8,620
Gwinnett GA	DUNCANS D	104	1,575
Gwinnett GA	LAWRENCEVILLE F	102	2,073
Gwinnett GA	LAWRENCEVILLE F	105	3,924
Gwinnett GA	LAWRENCEVILLE M	102	4,231
Gwinnett GA	LAWRENCEVILLE M	105	7,770
Gwinnett GA	MARTINS H	107	8,164
Gwinnett GA	MARTINS H	109	892
Gwinnett GA	PINCKNEYVILLE W	96	5,745
Gwinnett GA	PINCKNEYVILLE W	97	2,561
Gwinnett GA	PUCKETTS E	103	1,506
Gwinnett GA	PUCKETTS E	105	7,421
Gwinnett GA	SUGAR HILL D	100	2,158
Gwinnett GA	SUGAR HILL D	103	6,421
Gwinnett GA	SUWANEE F	99	3,224
Gwinnett GA	SUWANEE F	103	2,836
Habersham GA	HABERSHAM SOUTH	10	8,687
Habersham GA	HABERSHAM SOUTH	32	1,972
Hall GA	WILSON	28	3,803
Hall GA	WILSON	29	4,979
Henry GA	LAKE HAVEN	116	4,546
Henry GA	LAKE HAVEN	117	1,242
Henry GA	LOCUST GROVE	116	4,436
Henry GA	LOCUST GROVE	117	5,352
Henry GA	RED OAK	75	3,847
Henry GA	RED OAK	116	3,999
Henry GA	SWAN LAKE	91	1,951
Henry GA	SWAN LAKE	115	2,807
Houston GA	CENT	145	315
Houston GA	CENT	147	11,569
Houston GA	MCMS	144	11,859
Houston GA	MCMS	147	1,635
Houston GA	ROZR	144	13,202
Houston GA	ROZR	146	7,640

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Jackson GA	North Jackson	31	4,513
Jackson GA	North Jackson	32	10,931
Jackson GA	North Jackson	120	3,803
Jackson GA	West Jackson	31	16,656
Jackson GA	West Jackson	119	4,211
Liberty GA	BUTTON GWINNETT	167	5,109
Liberty GA	BUTTON GWINNETT	168	4,344
Lowndes GA	NORTHSIDE	175	8,373
Lowndes GA	NORTHSIDE	177	37,217
Lowndes GA	RAINWATER	175	6,400
Lowndes GA	RAINWATER	177	8,754
Lowndes GA	S LOWNDES	174	1,951
Lowndes GA	S LOWNDES	175	3,755
Lowndes GA	TRINITY	175	9,620
Lowndes GA	TRINITY	176	4,797
Lowndes GA	TRINITY	177	6,930
Lumpkin GA	DAHLONEGA	9	29,201
Lumpkin GA	DAHLONEGA	27	4,287
Muscogee GA	CUSSETA RD	140	5,391
Muscogee GA	CUSSETA RD	141	5,010
Muscogee GA	EPWORTH UMC	139	3,363
Muscogee GA	EPWORTH UMC	140	4,560
Muscogee GA	FORT/WADDELL	137	5,599
Muscogee GA	FORT/WADDELL	141	6,645
Muscogee GA	OUR LADY OF LOURDES	140	13,744
Muscogee GA	OUR LADY OF LOURDES	141	32
Muscogee GA	ROTHSCHILD	137	8,327
Muscogee GA	ROTHSCHILD	141	3,143
Muscogee GA	ST ANDREWS/MIDLAND	139	5,899
Muscogee GA	ST ANDREWS/MIDLAND	141	5,582
Newton GA	CEDAR SHOALS	93	1,206
Newton GA	CEDAR SHOALS	113	3,687
Newton GA	FAIRVIEW	93	856
Newton GA	FAIRVIEW	113	3,443
Newton GA	TOWN	93	1,668
Newton GA	TOWN	113	5,075
Paulding GA	AUSTIN MIDDLE SCHOOL	18	916
Paulding GA	AUSTIN MIDDLE SCHOOL	64	9,977
Paulding GA	BURNT HICKORY PARK	16	8,392
Paulding GA	BURNT HICKORY PARK	17	16
Paulding GA	CARL SCOGGINS MID SC	17	517
Paulding GA	CARL SCOGGINS MID SC	18	7,991
Paulding GA	CARL SCOGGINS MID SC	19	1,240
Paulding GA	HIRAM HIGH SCHOOL	17	0
Paulding GA	HIRAM HIGH SCHOOL	19	16,110
Paulding GA	SARA RAGSDALE ELM SC	17	5,972
Paulding GA	SARA RAGSDALE ELM SC	18	1,720

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Paulding GA	SHELTON ELEMENTARY SCHOOL	16	8,152
Paulding GA	SHELTON ELEMENTARY SCHOOL	17	12,810
Paulding GA	SHELTON ELEMENTARY SCHOOL	19	5,455
Paulding GA	WATSON GOVERNMENT COMPLEX	16	5
Paulding GA	WATSON GOVERNMENT COMPLEX	17	17,525
Richmond GA	109	129	954
Richmond GA	109	130	886
Richmond GA	301	127	2,362
Richmond GA	301	129	894
Richmond GA	402	126	0
Richmond GA	402	132	9,711
Richmond GA	503	129	3,260
Richmond GA	503	132	2,535
Richmond GA	702	127	586
Richmond GA	702	129	2,007
Richmond GA	703	127	1,164
Richmond GA	703	129	6,148
Richmond GA	803	126	0
Richmond GA	803	132	2,432
Richmond GA	807	126	2,403
Richmond GA	807	132	0
Rockdale GA	MILSTEAD	93	6,444
Rockdale GA	MILSTEAD	95	0
Rockdale GA	OLD TOWNE	93	10,095
Rockdale GA	OLD TOWNE	95	872
Rockdale GA	ROCKDALE	92	6,218
Rockdale GA	ROCKDALE	93	79
Spalding GA	CARVER FIRE STATION	78	235
Spalding GA	CARVER FIRE STATION	134	2,835
Spalding GA	GARY REID FIRE STATION	78	2,075
Spalding GA	GARY REID FIRE STATION	134	4,817
Spalding GA	UGA CAMPUS	78	787
Spalding GA	UGA CAMPUS	134	5,290
Sumter GA	GSW CONF CENTER	150	4,568
Sumter GA	GSW CONF CENTER	151	1,549
Sumter GA	REES PARK	150	5,179
Sumter GA	REES PARK	151	447
Troup GA	MOUNTVILLE	136	2,068
Troup GA	MOUNTVILLE	137	497
Walton GA	BROKEN ARROW	111	2,993
Walton GA	BROKEN ARROW	112	3,003
Ware GA	100	174	2,672
Ware GA	100	176	3,692

Political Subdivision Splits Between Districts

GA House Illustrative

County	Voting District	District	Population
Ware GA	200A	174	0
Ware GA	200A	176	4,133
Ware GA	304	174	0
Ware GA	304	176	2,107
Ware GA	400	174	2,506
Ware GA	400	176	2,526
Wayne GA	OGLETHORPE	167	1,928
Wayne GA	OGLETHORPE	178	637
Whitfield GA	2A	2	3,864
Whitfield GA	2A	4	1,000
Whitfield GA	PLEASANT GROVE	2	6,210
Whitfield GA	PLEASANT GROVE	6	2,122

EXHIBIT 2

Expert Report of Dr. Maxwell Palmer

Grant v. Raffensperger (N.D. Ga.)

December 12, 2022



EXPERT REPORT OF MAXWELL PALMER, PH.D.

I, Dr. Maxwell Palmer, declare as follows:

1. My name is Maxwell Palmer. I am currently an Associate Professor of Political Science at Boston University. I joined the faculty at Boston University in 2014, after completing my Ph.D. in Political Science at Harvard University. I was promoted to Associate Professor, with tenure, in 2021. I am also a Civic Tech Fellow in the Faculty of Computing & Data Sciences and a Faculty Fellow at the Initiative on Cities. I teach and conduct research on American politics and political methodology.
2. I have published academic work in leading peer-reviewed academic journals, including the *American Political Science Review*, *Journal of Politics*, *Perspectives on Politics*, *British Journal of Political Science*, *Journal of Empirical Legal Studies*, *Political Science Research and Methods*, *Legislative Studies Quarterly*, and *Urban Affairs Review*. My book, *Neighborhood Defenders: Participatory Politics and America's Housing Crisis*, was published by Cambridge University Press in 2019. I have also published academic work in the *Ohio State University Law Review*. My published research uses a variety of analytical approaches, including statistics, geographic analysis, and simulations, and data sources including academic surveys, precinct-level election results, voter registration and vote history files, and census data. My curriculum vitae is attached to this report.
3. I have served as an expert witness or litigation consultant on numerous cases involving voting restrictions. I testified at trial, court hearing, or by deposition in *Bethune Hill v. Virginia* before the U.S. District Court for the Eastern District of Virginia (No. 3:14-cv-00852-REP-AWA-BMK); *Thomas v. Bryant* before the U.S. District Court for the Southern District of Mississippi (No. 3:18-CV-00441-CWR-FKB); *Chestnut v. Merrill* before the U.S. District Court for the Northern District of Alabama (No. 2:18-cv-00907-KOB); *Dwight v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:18-cv-2869-RWS); *Bruni v. Hughs* before the U.S. District Court for the Southern District of Texas (No. 5:20-cv-35); *Caster v. Merrill* before the U.S. District Court for the Northern District of Alabama (No. 2:21-cv-1536-AMM); *Pendergrass v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:21-CV-05339-SCJ); *Grant v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:22-CV-00122-SCJ); and *Galmon v. Ardoin* before the U.S. District Court for the Middle District of Louisiana (3:22-cv-00214-SDD-SDJ). I also served as the independent racially polarized voting analyst for the Virginia Redistricting Commission in 2021, and I have worked as a consultant to the United State Department of Justice on several matters. My expert testimony has been accepted and relied upon by courts; in no case has my testimony been rejected or

found unreliable.

4. I am being compensated at a rate of \$350 per hour. No part of my compensation is dependent upon the conclusions that I reach or the opinions that I offer.
5. I testified in this matter in the preliminary injunction proceedings on February 10, 2022. I was accepted by the court as an expert in redistricting and data analysis.
6. I was retained by the plaintiffs in this litigation to offer an expert opinion on the extent to which voting is racially polarized in parts of Georgia. I was also asked to evaluate the performance of the new majority-minority districts in the plaintiffs' illustrative maps.
7. I find strong evidence of racially polarized voting across the areas of Georgia I examined. Black and White voters consistently support different candidates.
8. Black-preferred candidates are largely unable to win elections in the non-majority-Black districts in the the areas of Georgia I examined.
9. Under the plaintiffs' illustrative House and Senate maps, I find that Black-preferred candidates are generally able to win elections in all of the new majority-Black districts.

Data Sources and Elections Analyzed

10. For the purpose of my analysis, I examined elections across five different focus areas, based on the House and Senate maps adopted by the Georgia General Assembly in 2021.¹ Collectively, I refer to these areas as the "focus areas." Figure 1 maps the focus areas, and Figures 6–10 provide more detailed maps. These focus areas are defined as the areas from which the new majority-minority districts in the plaintiffs' illustrative maps are drawn.
11. There are three focus areas for the House plan:
 - *Black Belt*: House Districts 133, 142, 143, 145, 147, and 149. These districts include Bleckley, Crawford, Dodge, Twiggs, and Wilkinson Counties and parts of Baldwin, Bibb, Houston, Jones, Monroe, Peach, and Telfair Counties.
 - *Southern Atlanta*: House Districts 69, 74, 75, 78, 115, and 117. These districts include parts of Clayton, Fayette, Fulton, Henry, and Spalding Counties.
 - *Western Atlanta*: House Districts 61 and 64. These districts include parts of Douglas, Fulton, and Paulding Counties.
12. There are two focus areas for the Senate plan:
 - *Black Belt*: Senate Districts 22, 23, 24, 25, and 26. These districts include Baldwin, Burke, Butts, Columbia, Elbert, Emanuel, Glascock, Greene, Hancock, Hart, Jasper, Jefferson, Jenkins, Johnson, Jones, Lincoln, McDuffie, Oglethorpe, Putnam, Richmond,

¹Shape files and demographic data on each plan were downloaded from the website of the Georgia General Assembly's Legislative and Congressional Reapportionment Office (House Bill 1EX and Senate Bill 1EX).

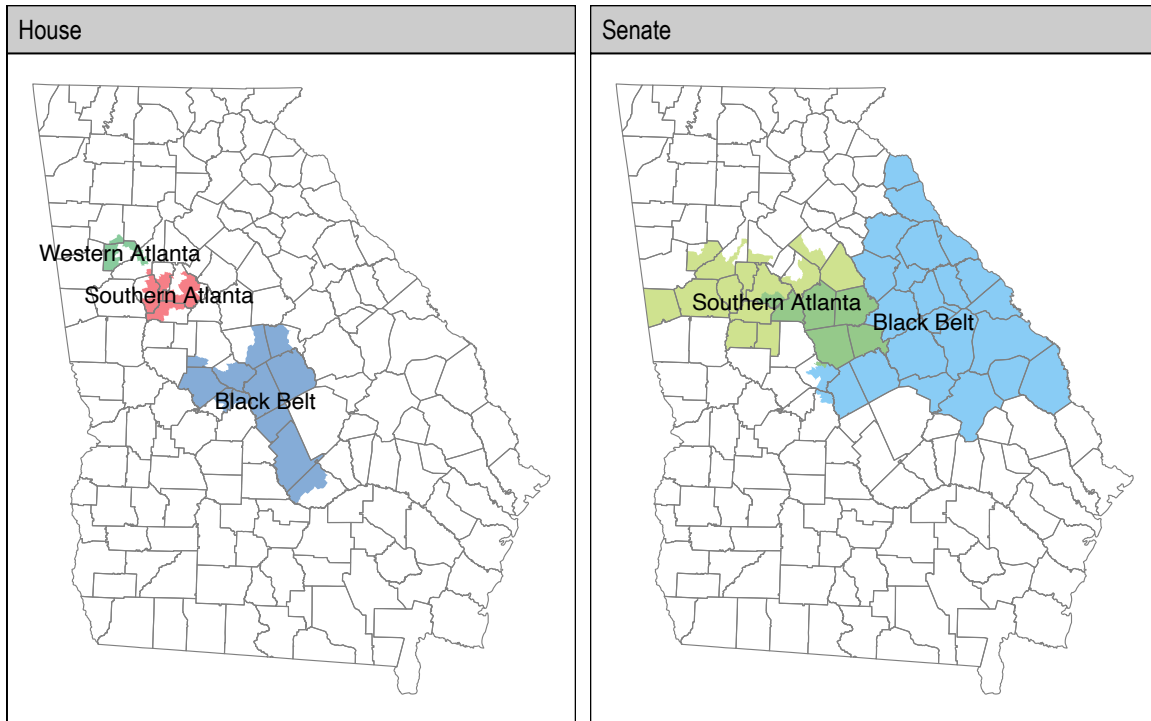


Figure 1: Maps of the Focus Areas

Screven, Taliaferro, Twiggs, Warren, Washington, Wilkes, and Wilkinson Counties and parts of Bibb, Henry, and Houston Counties.

- *Southern Atlanta*: Senate Districts 10, 16, 17, 25, 28, 34, 35, 39, and 44.² These districts include Baldwin, Butts, Clayton, Coweta, Fayette, Heard, Jasper, Jones, Lamar, Morgan, Pike, Putnam, and Spalding Counties and parts of Bibb, DeKalb, Douglas, Fulton, Henry, Newton, and Walton Counties.
13. To analyze racially polarized voting, I relied on precinct-level election results and voter turnout by race, compiled by the state of Georgia. The data includes the racial breakdown of registrants and voters in each precinct, based on registrants' self-identified race when registering to vote. Data for the 2012, 2014, 2016, and 2018 general elections was provided to counsel by the Georgia Secretary of State in a prior case.³ Data on turnout by race for the 2020 general election and the 2018 and 2021 runoff elections was retrieved from the website of the Georgia Secretary of State.⁴ Data on turnout by race for the 2022 general election was provided to counsel by the Georgia Secretary of State, and 2022 precinct-level election results were downloaded from the the website of the Georgia Secretary of State.⁵ Precinct-level election results for the 2018,⁶ 2020, and

²Senate District 25 is included in both Senate focus areas.

³*Dwight v. Raffensperger* (No. 1:18-cv-2869-RWS).

⁴<https://sos.ga.gov/index.php/Elections>.

⁵<https://results.enr.clarityelections.com/GA/115465/web.307039/#/summary>.

⁶Voting and Election Science Team, 2019, "2018 Precinct-Level Election Results", <https://doi.org/10.>

2021⁷ elections was assembled by the Voting and Election Science Team, an academic group that provides precinct-level data for U.S. Elections, based on data from the Secretary of State.^{8,9} Precinct shape files for 2012 through 2020 were downloaded from the Georgia General Assembly’s Legislative and Congressional Reapportionment Office.¹⁰

14. The state of Georgia provides six options for race and ethnicity on the voter registration form: Black, White, Hispanic/Latino, Asian/Pacific Islander, American Indian, and Other.¹¹ I combined Hispanic/Latino, Asian/Pacific Islander and American Indian into the “Other” category.

Racially Polarized Voting Analysis

15. In analyzing racially polarized voting in each election, I used a statistical procedure, ecological inference (EI), that estimates group-level preferences based on aggregate data. I analyzed the results for three racial demographic groups: Non-Hispanic Black, Non-Hispanic White, and Other, based on the voters’ self-identified race in the voter registration database. I excluded third-party and write-in candidates, and analyzed votes for the two major-party candidates in each election. The results of this analysis are estimates of the percentage of each group that voted for the candidate from each party in each election. The results include both a mean estimate (the most likely vote share) and a 95% confidence interval.¹²
16. Interpreting the results of the ecological inference models proceeds in two general stages. First, I examined the support for each candidate by each demographic group to determine if members of the group vote cohesively in support of a single candidate in each election. When a significant majority of the group supports a single candidate, I can then identify that candidate as the group’s candidate of choice. If the group’s support is roughly evenly divided between the two candidates, then the group does not cohesively support a single candidate and does not have a clear preference. Second, after identifying the preferred candidate for each group (or the lack of such a candidate), I compared the preferences of White voters to the preferences of Black voters. Evidence of

7910/DVN/UBKYRU, Harvard Dataverse, V47; ga_2018.zip.

⁷Voting and Election Science Team, 2020, “2020 Precinct-Level Election Results”, <https://doi.org/10.7910/DVN/K7760H>, Harvard Dataverse, V21; ga_2020.zip. Note that the 2020 election results file includes the 2021 runoff election results as well.

⁸The election results provided by VEST are the same as the precinct-level data available on the website of the Georgia Secretary of State. However, VEST provides the data in a more convenient format.

⁹As of December 12, 2022, precinct-level voter turnout data for the 2022 runoff election was not available.

¹⁰<https://www.legis.ga.gov/joint-office/reapportionment>.

¹¹https://sos.ga.gov/admin/files/GA_VR_APP_2019.pdf.

¹²The 95% confidence interval is a measure of uncertainty in the estimates from the model. For example, the model might estimate that 94% of the members of a group voted for a particular candidate, with a 95% confidence interval of 91-96%. This means that based on the data and the model assumptions, 95% of the simulated estimates for this group fall in the range of 91-96%, with 94% being the average value. Larger confidence intervals reflect a higher degree of uncertainty in the estimates, while smaller confidence intervals reflect less uncertainty.

racially polarized voting is found when Black voters and White voters support different candidates.

17. Figure 2 presents the estimates of support for the Black-preferred candidate for Black and White voters for all 40 electoral contests from 2012 to 2020 across the five focus areas. Here, I present only the estimates and confidence intervals, and exclude individual election labels. Full results for each election are presented in Tables 2-6. In each panel, the dots correspond to an estimate in a particular election, and the gray vertical lines behind each dot are the 95% confidence intervals for the estimate.¹³
18. Examining Figure 2, the estimates for support for Black-preferred candidates by Black voters across are all significantly above 50% across the five focus areas. Black voters are extremely cohesive, with a clear candidate of choice in all 40 elections. In contrast to Black voters, Figure 2 shows that White voters are highly cohesive in voting in *opposition* to the Black-preferred candidate in every election across the five focus areas. Table 1 lists the average level of support for the Black-preferred candidate for Black and White voters in each focus area. Across all five focus areas, Black voters support their preferred candidate with an average of 98.5% and a minimum of 95.2% of the vote, and White voters support Black-preferred candidates with an average of 8.3% and

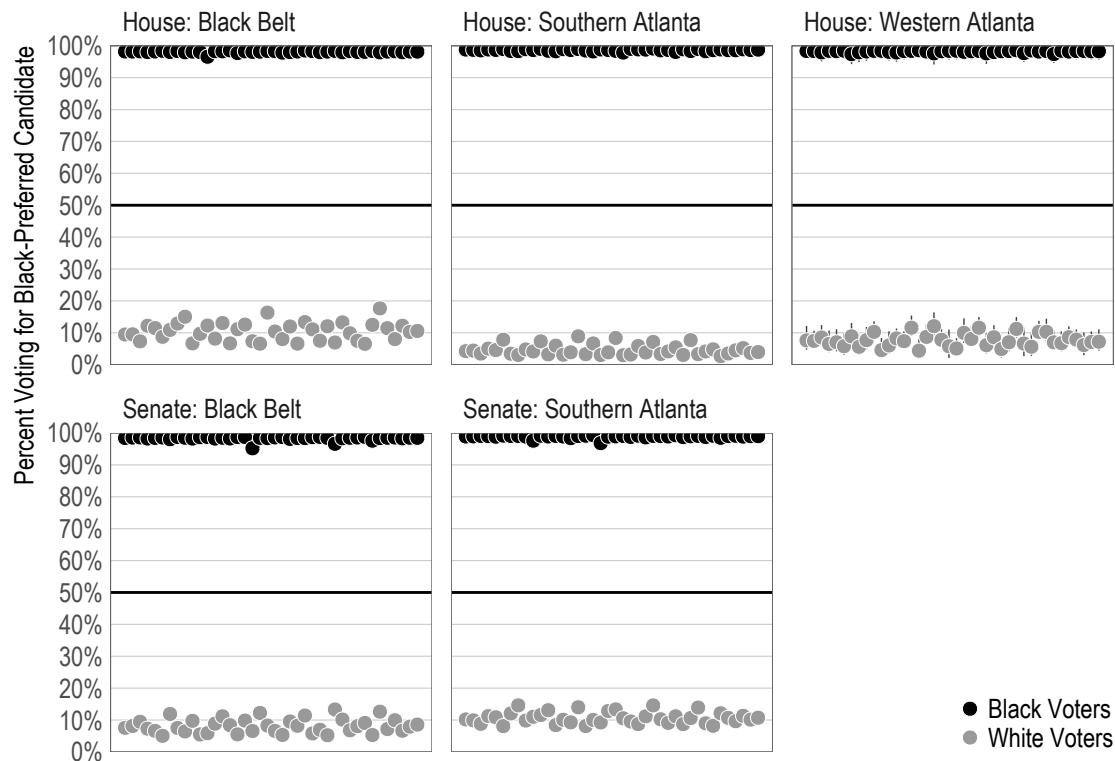


Figure 2: Racially Polarized Voting Estimates by Race — Focus Area

¹³In some cases the lines for the confidence intervals are not visible behind the dots because they are relatively small.

Table 1: Average Support for Black-Preferred Candidates by Voters' Race

	Focus Area	Black Voters	White Voters
House	Black Belt	98.1%	10.4%
	Southern Atlanta	98.7%	4.6%
	Western Atlanta	98.2%	7.7%
Senate	Black Belt	98.4%	8.2%
	Southern Atlanta	98.9%	10.7%

a maximum of 17.7% of the vote. This is strong evidence of racially polarized voting across all five focus areas.

19. There is also strong evidence of racially polarized voting within the districts comprising the five focus areas. I estimated ecological inference models for each election for every district in the focus areas with fifteen or more precincts.¹⁴ Figure 3 plots the average ecological inference across the 40 statewide elections analyzed.¹⁵ There is consistent evidence of racially polarized voting in every House district analyzed, and in 12 of the 14 Senate districts. Voting is generally less polarized in Senate District 44, and not polarized in Senate District 39.

¹⁴House Districts 64, 75, 78, 115, 117, 142, 143, and 147 do not have at least fifteen precincts for every election, and are excluded from the analysis.

¹⁵Table 7 presents the numerical results for Figure 3. Due to the large number of ecological inference models estimates (20 districts \times 40 elections = 800 models), I do not provide results for each separate election here. In Figure 3 and Table 7 I present results averaging across the 40 elections.

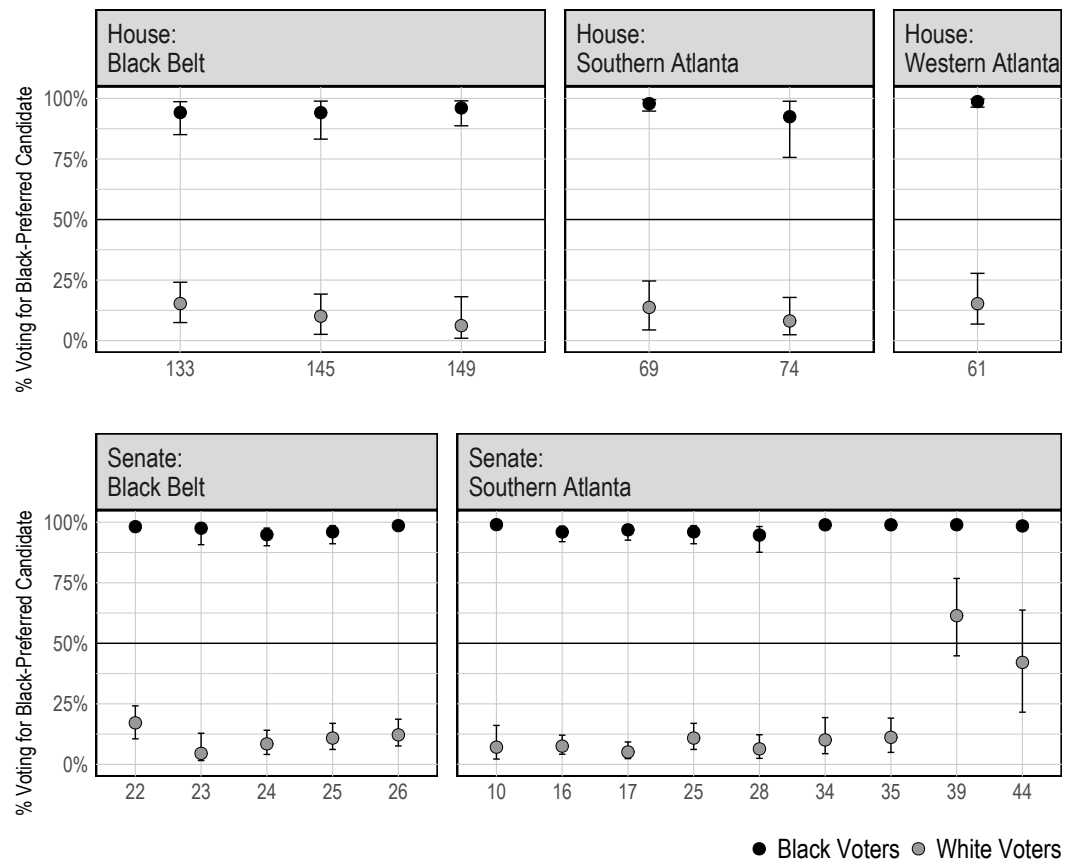


Figure 3: Average Racially Polarized Voting Estimates by District

Performance of Black-Preferred Candidates in the Focus Area

20. Having identified the Black-preferred candidate in each election, I now turn to their ability to win elections in these districts. Table 8 presents the results for each election in the focus areas and districts. For each election, I calculate the vote share obtained by the Black-preferred candidate.¹⁶ Black-preferred candidates are able to win elections in the Southern Atlanta and Western Atlanta focus areas for the House districts. However, they are only able to do so due to the high support for Black-preferred candidates in the majority-Black districts.
21. Figure 4 plots the average share of the vote received by the Black-preferred candidate across each district. The solid black circles indicate majority-Black districts, and the gray circles indicate non-majority-Black districts. Black-preferred candidates win almost every election in the majority-Black districts, but lose almost every election in the non-majority-Black districts.

¹⁶Winning elections in Georgia requires a majority of the vote rather than a plurality of the vote (the threshold in most of the states). In this table and following sections analyzing election results I present vote shares as percentages of the two-party vote (excluding third party and independent candidates).

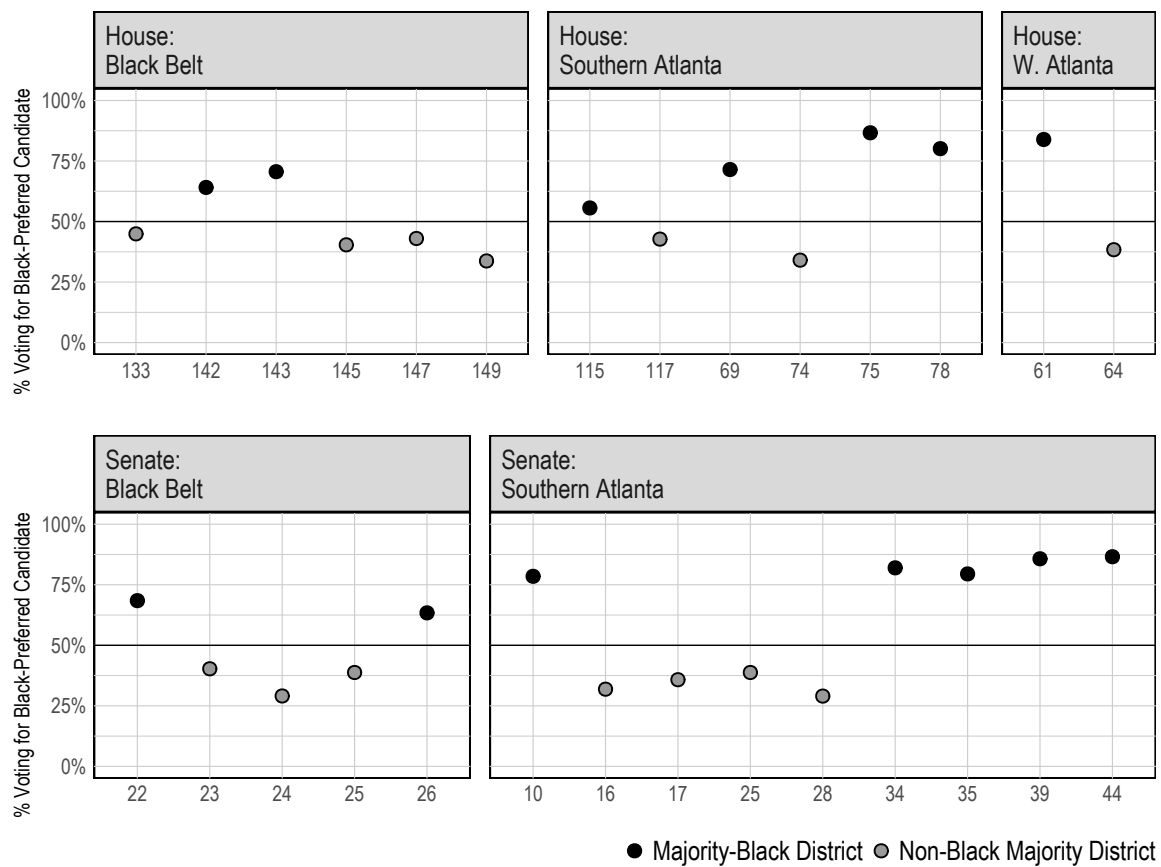


Figure 4: Average Performance of Black-Preferred Candidates by District

Performance of the New Majority-Black Districts in the Illustrative Maps

22. I also analyzed the performance of Black-preferred candidates in the new majority-Black districts in the plaintiffs' illustrative maps by calculating the percentage of the vote won by the Black-preferred candidates across the 31 statewide races from 2012 through 2021 for each district.
23. To perform this analysis, I used geographic data on the boundaries of the voting precincts in each year and the boundaries of the districts in the illustrative maps to determine which voting precincts would be located in each district. Then, I aggregated the election results for each contest for all of the precincts in each district to find the estimated vote shares of candidates in each contest. I was not able to include the 2022 elections in this analysis because, as of December 12, 2022, precinct boundary data for the 2022 voting precincts was not available.
24. Figure 5 presents the results of this analysis. In House Districts 64, 74, and 149, and Senate Districts 23, 25, and 28, the Black-preferred candidate won a larger share of the vote in all 40 statewide elections. In House District 117, the Black-preferred candidate won all 19 elections since 2018. In House District 145, the Black-preferred candidate won all 19 elections since 2018, and 27 of the 31 elections overall. Table 9 provides the full results.
25. Under the plaintiffs' illustrative maps, the majority-Black districts in the focus areas under the adopted maps for the House and Senate continue to perform for Black-preferred candidates with similar or higher vote shares.

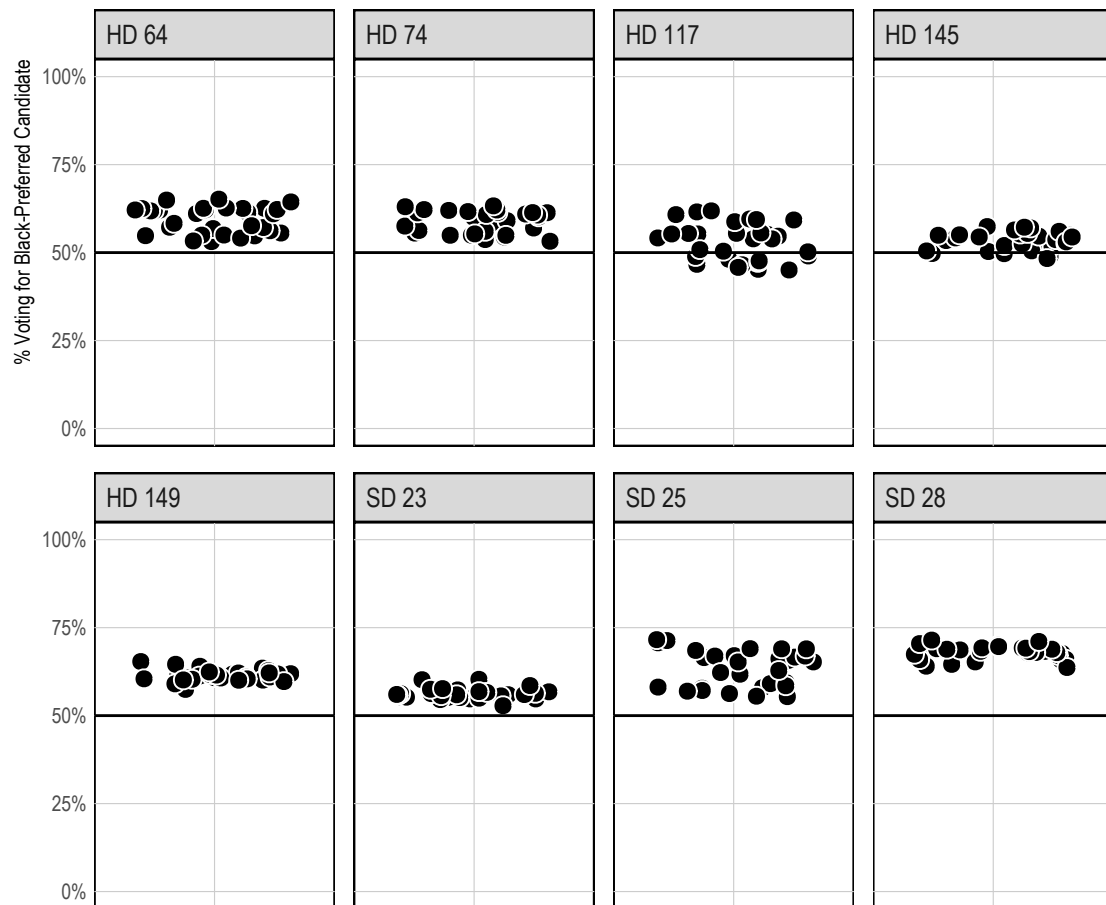


Figure 5: Vote Shares of Black-Preferred Candidates in Under the Illustrative Maps

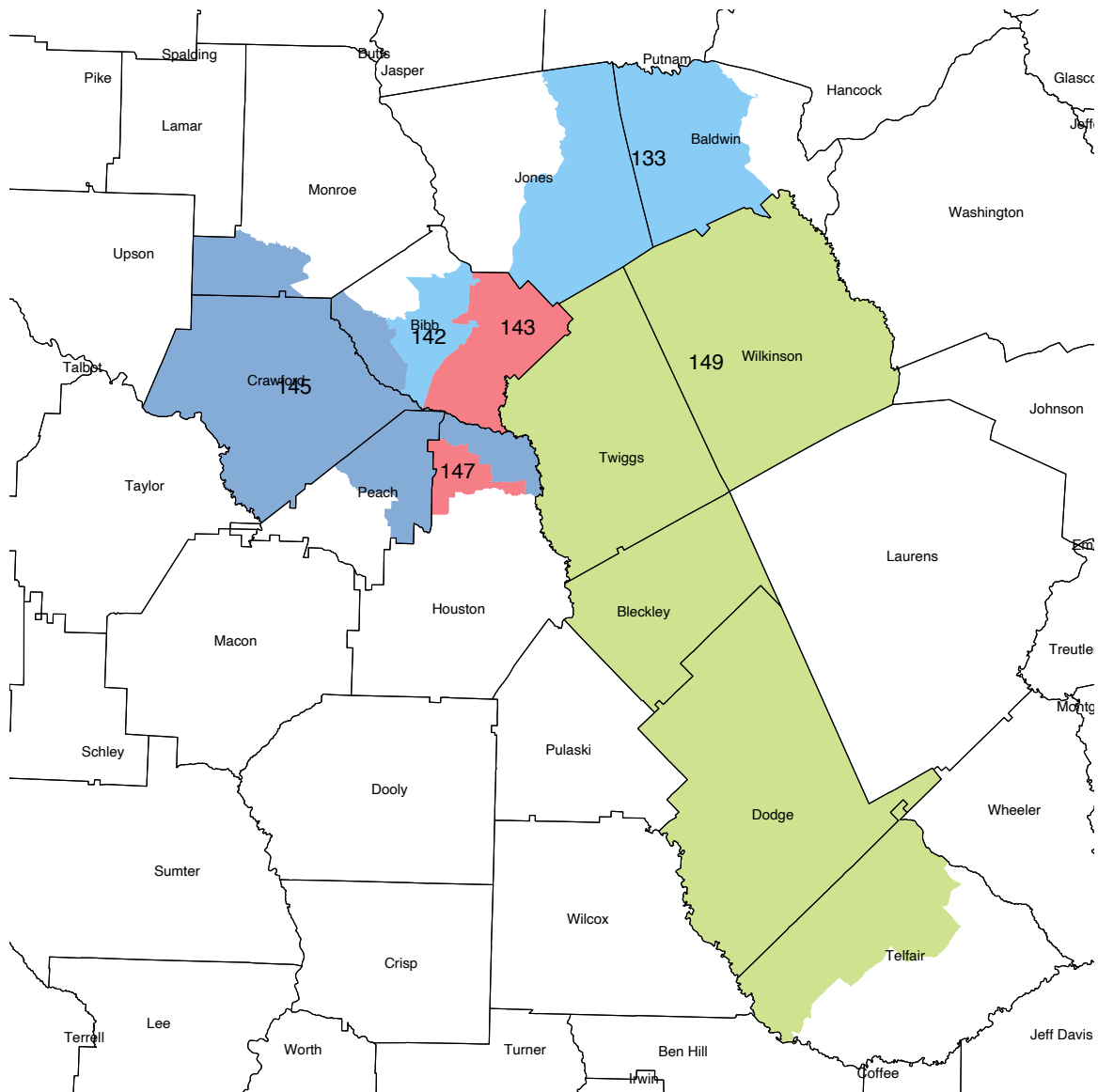


Figure 6: House Black Belt Focus Area

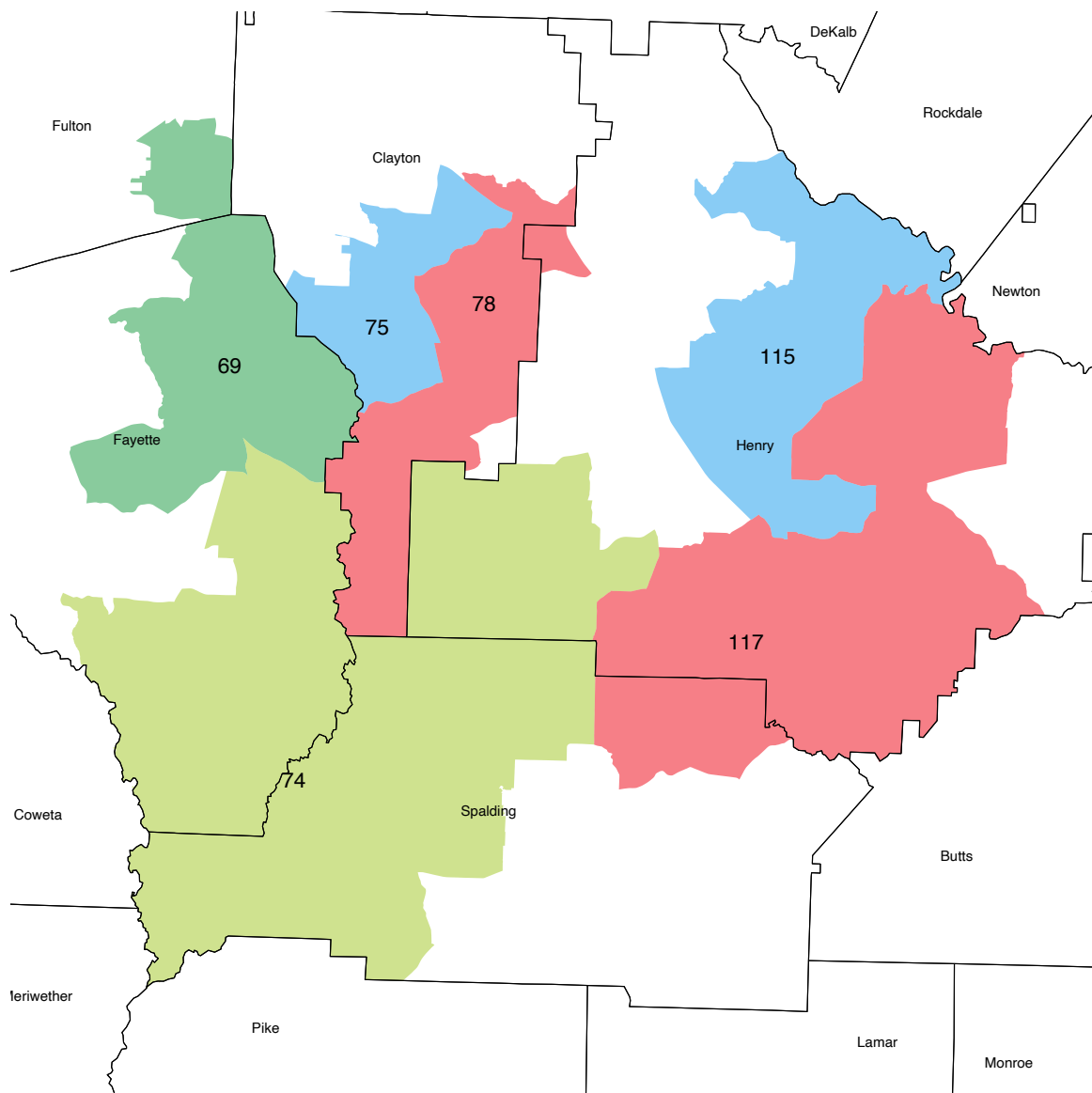


Figure 7: House Southern Atlanta Focus Area

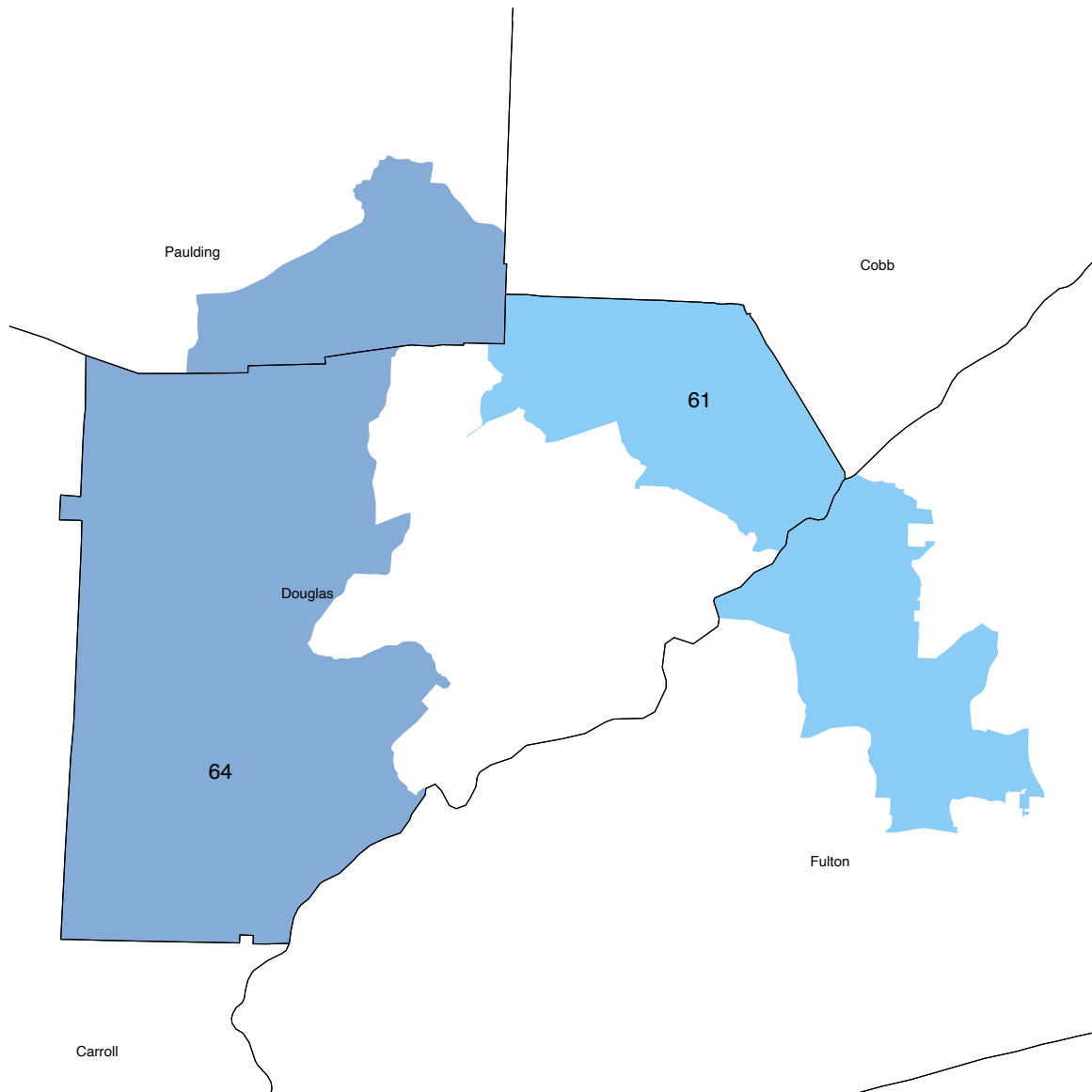


Figure 8: House Western Atlanta Focus Area

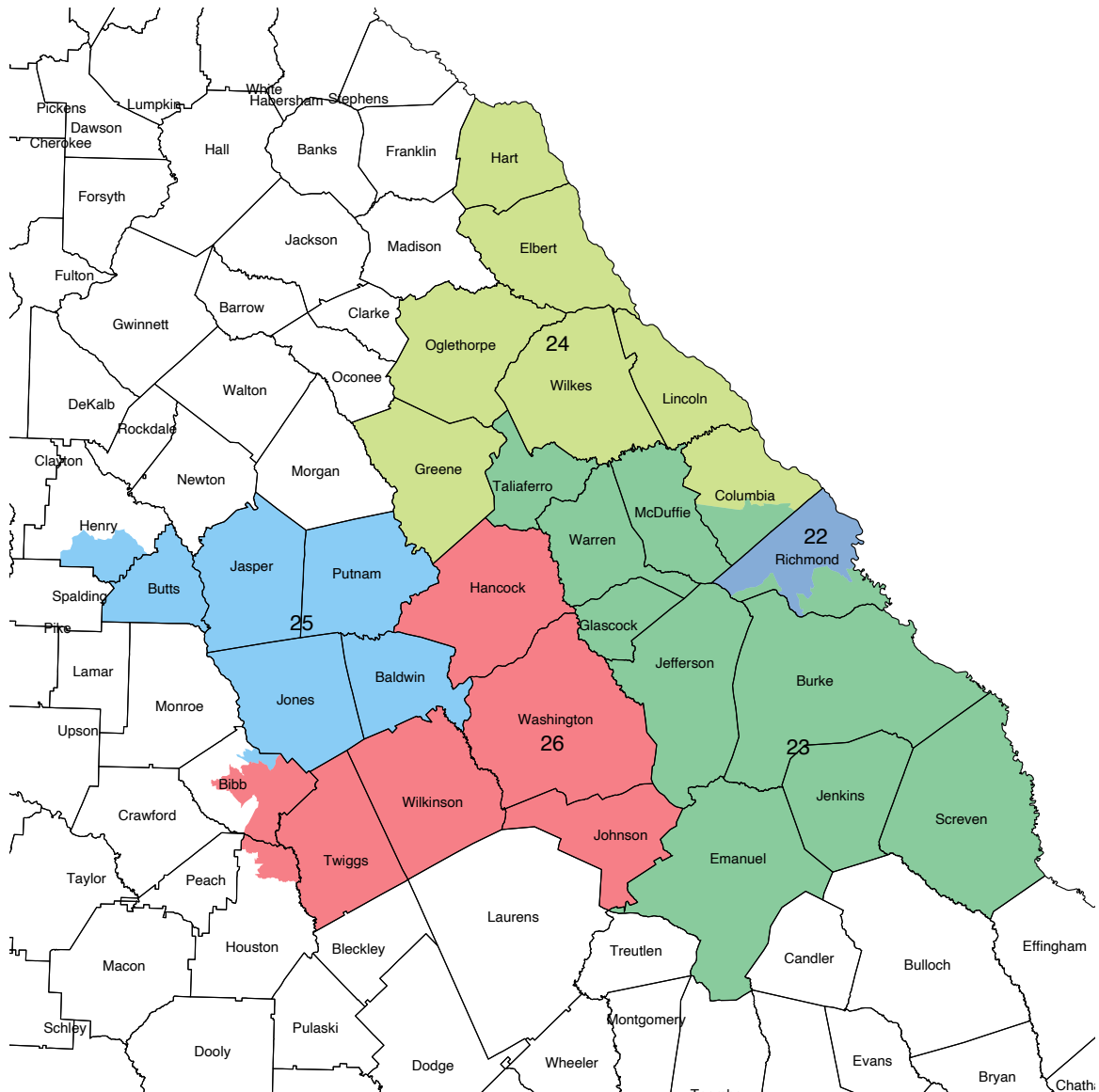


Figure 9: Senate Black Belt Focus Area

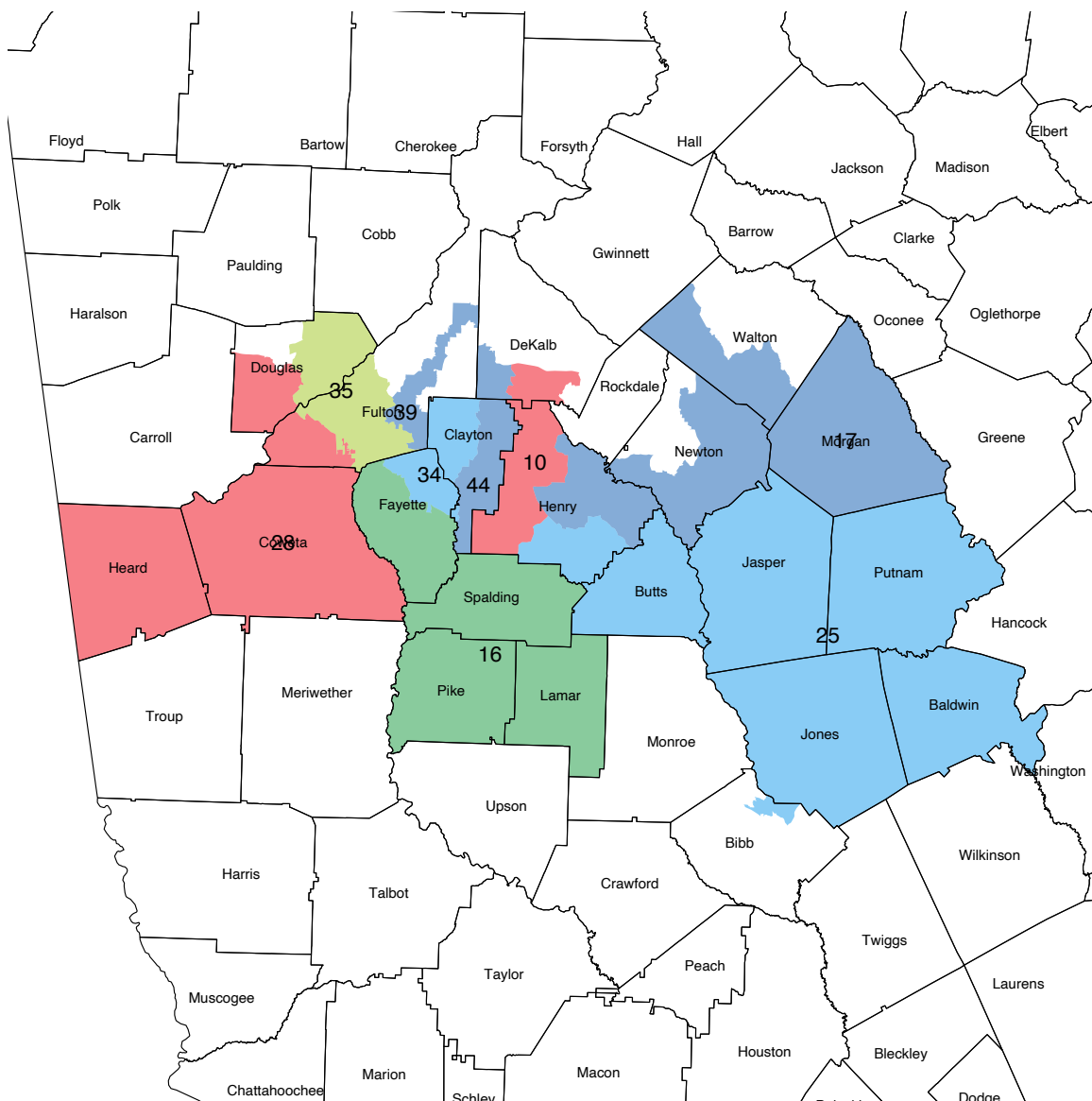


Figure 10: Senate Southern Atlanta Focus Area

Table 2: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates
— House: Black Belt

		Black	White	Other
2012 General	U.S. President*	98.4% (97.3, 99.1)	13.1% (12.2, 14.2)	89.2% (78.7, 95.2)
2014 General	U.S. Senator	98.0% (96.8, 98.9)	16.3% (15.2, 17.7)	79.8% (61.5, 91.8)
	Governor	98.0% (96.7, 98.9)	17.7% (16.4, 19.2)	74.5% (49.0, 90.5)
	Lt. Governor*	97.7% (96.5, 98.6)	11.1% (9.8, 12.6)	63.7% (39.0, 84.6)
	Sec. of State*	98.0% (96.7, 98.8)	11.5% (10.3, 12.9)	73.2% (49.6, 90.6)
	Attorney General	97.8% (96.6, 98.7)	12.9% (11.6, 14.4)	72.5% (50.0, 90.0)
	Com. Agriculture	97.9% (96.7, 98.8)	12.2% (10.9, 13.9)	59.6% (32.7, 82.7)
	Com. Insurance*	98.3% (97.2, 99.1)	12.0% (11.0, 13.5)	78.4% (54.7, 91.6)
	Com. Labor*	98.1% (96.9, 99.0)	12.3% (11.2, 13.6)	76.8% (53.1, 89.8)
	School Super.*	98.1% (97.0, 98.9)	15.0% (13.9, 16.5)	80.1% (54.3, 92.8)
2016 General	U.S. President	98.2% (96.9, 99.1)	11.5% (10.4, 12.8)	89.5% (79.0, 95.9)
	U.S. Senator	96.6% (95.0, 97.7)	7.0% (5.7, 8.5)	76.8% (59.1, 89.2)
2018 General	Governor*	98.6% (97.6, 99.3)	9.5% (8.7, 10.6)	93.0% (86.5, 97.1)
	Lt. Governor	98.3% (97.2, 99.1)	9.8% (8.8, 11.1)	90.1% (82.4, 95.6)
	Sec. of State	98.3% (97.2, 99.2)	13.3% (12.2, 14.6)	89.6% (80.5, 95.5)
	Attorney General	98.2% (96.9, 99.0)	10.6% (9.4, 12.0)	87.9% (76.4, 95.0)
	Com. Agriculture	98.3% (97.2, 99.0)	7.3% (6.3, 8.6)	86.9% (76.1, 95.0)
	Com. Insurance*	98.5% (97.3, 99.3)	8.7% (7.8, 10.0)	90.1% (82.0, 95.5)
	Com. Labor	98.4% (97.3, 99.1)	8.0% (7.2, 9.1)	92.2% (85.5, 96.7)
	School Super.*	98.4% (97.3, 99.2)	7.3% (6.4, 8.6)	91.0% (81.9, 96.4)
	Public Serv. Com. 3	98.2% (96.9, 99.1)	11.1% (10.0, 12.4)	89.1% (81.5, 94.9)
	Public Serv. Com. 5	98.3% (97.0, 99.1)	9.7% (8.7, 11.0)	90.1% (82.5, 95.8)
2018 Runoff	Sec. of State	98.1% (96.8, 99.0)	13.4% (12.2, 14.7)	85.6% (72.7, 94.0)
	Public Serv. Com. 3	98.0% (96.7, 99.0)	12.5% (11.3, 13.9)	86.4% (71.3, 95.2)
2020 General	U.S. President	98.4% (97.3, 99.1)	10.9% (9.9, 12.3)	90.6% (82.0, 95.8)
	U.S. Senator	98.0% (96.7, 98.9)	10.3% (9.1, 11.8)	88.4% (79.3, 94.9)
	Public Serv. Com. 1*	98.4% (97.2, 99.2)	8.0% (7.2, 9.1)	94.5% (89.9, 97.7)
	Public Serv. Com. 4*	98.3% (96.9, 99.2)	9.5% (8.3, 10.9)	90.2% (82.1, 95.4)
2021 Runoff	U.S. Senator (Perdue)	98.3% (97.1, 99.1)	12.0% (11.0, 13.2)	93.9% (88.5, 97.6)
	U.S. Senator (Loeffler)*	98.2% (97.0, 99.1)	12.6% (11.6, 13.8)	93.3% (87.1, 97.2)
	Public Serv. Com. 4*	98.2% (96.9, 99.1)	10.4% (9.5, 11.6)	94.3% (89.3, 97.4)
2022 General	U.S. Senator*	98.2% (96.8, 99.1)	12.2% (11.2, 13.5)	92.5% (86.2, 96.7)
	Governor*	98.3% (97.1, 99.1)	6.6% (5.8, 7.8)	91.4% (84.7, 96.4)
	Lt. Governor	98.2% (97.0, 99.1)	7.5% (6.6, 8.7)	91.0% (83.3, 95.8)
	Sec. of State	98.0% (96.8, 98.9)	6.6% (5.4, 8.1)	83.9% (74.5, 92.4)
	Attorney General	98.2% (96.8, 99.0)	8.2% (7.3, 9.4)	93.6% (88.4, 96.9)
	Com. Agriculture*	98.2% (96.9, 99.0)	6.7% (5.8, 7.9)	90.7% (83.7, 95.4)
	Com. Insurance*	98.1% (96.8, 99.0)	6.7% (5.8, 7.9)	92.4% (86.1, 96.5)
	Com. Labor*	98.2% (96.9, 99.1)	7.5% (6.6, 8.8)	90.7% (83.5, 95.7)
	School Super.*	98.0% (96.7, 98.9)	6.5% (5.6, 7.7)	90.9% (84.1, 95.7)

* Indicates that the Black candidate of choice was Black.

Table 3: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates
— House: Southern Atlanta

		Black	White	Other
2012 General	U.S. President*	99.1% (98.5, 99.6)	3.7% (2.9, 4.6)	96.1% (93.5, 97.8)
2014 General	U.S. Senator	98.8% (98.0, 99.4)	6.7% (5.7, 7.8)	95.4% (92.2, 97.6)
	Governor	98.7% (97.9, 99.2)	7.1% (5.9, 8.7)	91.4% (84.9, 95.8)
	Lt. Governor*	98.3% (97.2, 99.0)	3.0% (2.1, 4.3)	77.6% (70.3, 84.6)
	Sec. of State*	98.4% (97.5, 99.1)	3.2% (2.3, 4.6)	83.6% (76.5, 89.8)
	Attorney General	98.2% (97.3, 98.9)	5.4% (4.1, 7.4)	89.2% (79.1, 94.7)
	Com. Agriculture	97.9% (96.7, 98.8)	3.1% (2.1, 4.4)	77.3% (69.1, 85.3)
	Com. Insurance*	98.3% (97.5, 99.0)	2.7% (2.0, 3.6)	90.3% (85.2, 94.6)
	Com. Labor*	98.6% (97.8, 99.2)	3.1% (2.2, 4.5)	88.2% (81.6, 93.5)
	School Super.*	99.0% (98.4, 99.4)	4.5% (3.4, 5.8)	92.3% (86.6, 96.0)
2016 General	U.S. President	98.9% (98.2, 99.4)	4.6% (3.6, 5.8)	94.6% (91.1, 97.0)
	U.S. Senator	98.3% (97.5, 99.0)	3.1% (1.9, 4.7)	74.9% (68.7, 80.4)
2018 General	Governor*	99.0% (98.3, 99.5)	4.4% (3.4, 5.6)	96.4% (94.3, 97.9)
	Lt. Governor	98.7% (98.0, 99.2)	3.9% (3.0, 5.1)	95.2% (91.9, 97.5)
	Sec. of State	98.9% (98.3, 99.4)	4.8% (3.8, 6.0)	95.3% (92.3, 97.5)
	Attorney General	98.9% (98.1, 99.4)	4.8% (3.7, 6.2)	93.4% (89.2, 96.3)
	Com. Agriculture	98.7% (97.9, 99.3)	3.3% (2.3, 4.6)	88.6% (83.8, 92.7)
	Com. Insurance*	98.9% (98.2, 99.3)	3.9% (2.9, 5.2)	94.8% (91.8, 97.1)
	Com. Labor	98.5% (97.7, 99.1)	3.5% (2.5, 4.7)	91.8% (87.9, 95.3)
	School Super.*	99.0% (98.4, 99.4)	3.0% (2.1, 4.2)	87.9% (84.0, 91.2)
	Public Serv. Com. 3	98.9% (98.2, 99.4)	5.0% (4.0, 6.4)	94.8% (91.5, 97.0)
	Public Serv. Com. 5	99.0% (98.4, 99.4)	3.8% (2.8, 5.1)	94.6% (91.2, 96.9)
2018 Runoff	Sec. of State	98.8% (98.0, 99.3)	5.9% (4.7, 7.3)	94.5% (89.9, 97.3)
	Public Serv. Com. 3	98.7% (97.9, 99.3)	7.7% (6.4, 9.3)	94.3% (89.3, 97.4)
2020 General	U.S. President	98.6% (97.8, 99.2)	8.4% (6.4, 10.7)	86.6% (80.9, 92.1)
	U.S. Senator	98.6% (97.9, 99.2)	6.0% (4.6, 7.7)	91.4% (87.0, 94.9)
	Public Serv. Com. 1*	98.3% (97.4, 99.0)	4.1% (3.0, 5.6)	92.1% (88.0, 95.6)
	Public Serv. Com. 4*	98.7% (98.0, 99.3)	4.1% (3.1, 5.6)	93.7% (90.4, 96.3)
2021 Runoff	U.S. Senator (Perdue)	98.9% (98.3, 99.4)	7.3% (6.2, 8.6)	95.9% (93.3, 97.8)
	U.S. Senator (Loeffler)*	99.0% (98.4, 99.5)	7.8% (6.8, 9.2)	96.2% (93.7, 98.0)
	Public Serv. Com. 4*	98.9% (98.2, 99.3)	5.2% (4.2, 6.4)	96.2% (94.1, 97.9)
2022 General	U.S. Senator*	98.8% (98.1, 99.3)	8.9% (7.7, 10.3)	96.3% (93.6, 98.1)
	Governor*	98.8% (98.1, 99.3)	3.2% (2.3, 4.3)	89.8% (86.8, 92.7)
	Lt. Governor	98.6% (97.8, 99.2)	4.2% (3.3, 5.4)	94.0% (90.8, 96.6)
	Sec. of State	98.1% (96.9, 98.9)	4.0% (2.6, 5.7)	83.0% (78.1, 88.3)
	Attorney General	98.7% (98.0, 99.2)	4.2% (3.0, 5.7)	92.3% (88.4, 95.4)
	Com. Agriculture*	98.7% (97.9, 99.2)	3.3% (2.3, 4.5)	89.5% (86.1, 92.7)
	Com. Insurance*	98.4% (97.6, 99.1)	3.4% (2.3, 4.7)	89.4% (85.7, 92.9)
	Com. Labor*	98.6% (97.8, 99.2)	3.5% (2.6, 4.7)	93.1% (89.6, 96.3)
	School Super.*	98.4% (97.5, 99.1)	3.5% (2.4, 5.1)	88.8% (84.6, 92.8)

* Indicates that the Black candidate of choice was Black.

Table 4: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates
— House: Western Atlanta

		Black	White	Other
2012 General	U.S. President*	98.4% (95.7, 99.6)	7.5% (5.4, 10.6)	92.1% (83.4, 97.5)
2014 General	U.S. Senator	98.1% (95.4, 99.5)	10.3% (7.9, 13.6)	90.2% (80.4, 96.6)
	Governor	97.9% (95.0, 99.5)	11.6% (9.0, 15.0)	81.6% (69.6, 92.0)
	Lt. Governor*	97.7% (94.9, 99.4)	5.6% (3.0, 9.2)	75.3% (61.1, 88.7)
	Sec. of State*	98.2% (95.3, 99.6)	5.8% (3.1, 9.7)	77.6% (63.6, 89.6)
	Attorney General	97.6% (94.1, 99.4)	7.7% (4.8, 11.8)	79.4% (65.7, 91.2)
	Com. Agriculture	97.4% (94.2, 99.1)	6.2% (3.0, 10.1)	70.6% (54.8, 85.5)
	Com. Insurance*	97.6% (94.3, 99.4)	7.0% (4.1, 11.5)	80.0% (65.9, 90.9)
	Com. Labor*	97.9% (95.1, 99.4)	6.8% (4.2, 10.4)	82.3% (69.7, 93.0)
	School Super.*	97.9% (94.9, 99.5)	8.7% (6.2, 12.6)	88.4% (78.0, 96.3)
2016 General	U.S. President	98.3% (95.9, 99.5)	7.0% (4.7, 10.7)	91.4% (82.4, 96.8)
	U.S. Senator	97.4% (94.7, 99.2)	5.8% (2.1, 11.0)	75.4% (57.9, 90.3)
2018 General	Governor*	98.3% (95.8, 99.6)	8.5% (6.0, 12.4)	93.4% (86.0, 98.0)
	Lt. Governor	98.5% (96.6, 99.6)	7.8% (5.3, 11.1)	90.3% (81.6, 95.8)
	Sec. of State	98.4% (95.8, 99.6)	8.1% (5.7, 12.1)	92.5% (84.8, 97.3)
	Attorney General	98.2% (95.8, 99.4)	8.6% (6.2, 12.0)	89.3% (80.8, 95.2)
	Com. Agriculture	98.4% (95.9, 99.5)	6.0% (3.5, 10.5)	87.9% (78.2, 95.0)
	Com. Insurance*	98.2% (96.2, 99.4)	7.1% (4.9, 10.4)	93.5% (86.5, 97.9)
	Com. Labor	98.1% (95.5, 99.3)	6.5% (3.9, 10.7)	91.2% (83.1, 97.0)
	School Super.*	98.3% (96.1, 99.4)	6.1% (3.5, 9.9)	88.4% (78.6, 95.0)
	Public Serv. Com. 3	98.4% (95.8, 99.6)	8.9% (6.5, 13.1)	91.8% (83.7, 96.9)
	Public Serv. Com. 5	98.4% (96.3, 99.5)	7.4% (5.1, 10.5)	91.8% (84.0, 96.8)
2018 Runoff	Sec. of State	98.4% (96.2, 99.5)	8.2% (5.9, 11.4)	92.7% (84.5, 97.9)
	Public Serv. Com. 3	98.4% (96.1, 99.6)	10.3% (7.8, 13.7)	90.8% (82.0, 96.5)
2020 General	U.S. President	98.1% (95.8, 99.4)	10.3% (7.3, 14.4)	88.9% (79.4, 95.6)
	U.S. Senator	98.4% (95.7, 99.6)	10.0% (6.8, 14.5)	88.7% (79.1, 95.5)
	Public Serv. Com. 1*	98.3% (95.8, 99.5)	7.6% (4.7, 12.1)	89.9% (81.0, 96.1)
	Public Serv. Com. 4*	98.3% (96.0, 99.5)	8.6% (5.8, 12.4)	90.7% (82.4, 96.3)
2021 Runoff	U.S. Senator (Perdue)	98.4% (96.3, 99.6)	11.2% (8.5, 14.9)	93.0% (84.9, 97.6)
	U.S. Senator (Loeffler)*	98.3% (95.6, 99.6)	12.1% (9.2, 16.4)	93.3% (85.6, 98.0)
	Public Serv. Com. 4*	98.6% (96.5, 99.6)	7.9% (5.8, 11.1)	96.0% (90.9, 98.9)
2022 General	U.S. Senator*	98.4% (96.2, 99.6)	11.6% (9.0, 15.4)	95.2% (89.3, 98.5)
	Governor*	98.4% (96.5, 99.5)	4.6% (2.1, 8.3)	92.8% (85.5, 97.5)
	Lt. Governor	98.4% (96.3, 99.4)	7.2% (4.4, 11.1)	92.5% (85.1, 97.4)
	Sec. of State	98.3% (96.1, 99.4)	6.6% (2.7, 11.6)	79.7% (67.4, 89.8)
	Attorney General	98.3% (96.2, 99.4)	7.0% (4.2, 11.1)	91.7% (84.4, 97.0)
	Com. Agriculture*	98.6% (96.7, 99.5)	4.4% (2.0, 8.1)	92.7% (86.3, 97.1)
	Com. Insurance*	98.2% (96.2, 99.3)	5.6% (2.8, 10.0)	90.2% (82.0, 96.2)
	Com. Labor*	98.4% (96.7, 99.4)	5.1% (2.7, 8.3)	95.2% (89.3, 98.4)
	School Super.*	98.5% (96.7, 99.5)	4.9% (2.3, 8.6)	90.7% (83.0, 96.1)

* Indicates that the Black candidate of choice was Black.

Table 5: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates
— Senate: Black Belt

		Black	White	Other
2012 General	U.S. President*	96.6% (96.0, 97.2)	11.4% (10.9, 12.0)	93.9% (91.0, 96.2)
2014 General	U.S. Senator	98.7% (98.3, 99.1)	12.6% (11.9, 13.5)	82.1% (72.5, 89.0)
	Governor	98.4% (97.8, 98.9)	13.3% (12.4, 14.4)	70.6% (57.1, 80.0)
	Lt. Governor*	98.3% (97.8, 98.8)	8.1% (7.4, 8.9)	71.0% (62.0, 79.0)
	Sec. of State*	98.5% (98.0, 98.9)	8.3% (7.5, 9.1)	73.5% (64.5, 82.5)
	Attorney General	98.5% (98.0, 98.9)	9.6% (8.7, 10.4)	66.9% (57.2, 77.0)
	Com. Agriculture	98.4% (97.9, 98.9)	8.6% (7.8, 9.3)	69.6% (60.8, 78.5)
	Com. Insurance*	98.6% (98.1, 99.0)	8.9% (8.2, 9.6)	78.0% (69.5, 85.6)
	Com. Labor*	98.5% (98.0, 98.9)	9.1% (8.4, 9.9)	73.3% (64.1, 80.9)
	School Super.*	98.6% (98.1, 99.0)	11.2% (10.5, 12.0)	83.2% (74.5, 89.6)
2016 General	U.S. President	98.8% (98.3, 99.1)	8.4% (7.9, 8.9)	92.8% (89.6, 95.4)
	U.S. Senator	95.2% (94.3, 96.1)	5.5% (4.9, 6.2)	84.8% (78.6, 90.1)
2018 General	Governor*	98.8% (98.3, 99.1)	7.5% (7.1, 8.0)	95.5% (93.5, 97.1)
	Lt. Governor	98.3% (97.7, 98.8)	7.3% (6.8, 7.8)	93.3% (89.9, 95.8)
	Sec. of State	98.6% (98.0, 99.0)	12.2% (11.7, 12.8)	93.8% (90.6, 96.1)
	Attorney General	98.5% (98.0, 98.9)	7.9% (7.5, 8.4)	92.9% (89.6, 95.5)
	Com. Agriculture	98.1% (97.4, 98.6)	5.9% (5.4, 6.4)	89.7% (85.1, 93.4)
	Com. Insurance*	98.7% (98.2, 99.0)	6.6% (6.1, 7.0)	92.9% (89.9, 95.1)
	Com. Labor	98.4% (97.9, 98.8)	6.6% (6.1, 7.1)	90.2% (86.2, 93.7)
	School Super.*	98.3% (97.8, 98.8)	6.4% (5.9, 7.0)	89.3% (84.5, 93.1)
	Public Serv. Com. 3	98.7% (98.3, 99.1)	7.6% (7.1, 8.1)	93.6% (90.3, 95.9)
	Public Serv. Com. 5	98.7% (98.2, 99.1)	7.2% (6.7, 7.7)	92.9% (89.9, 95.3)
2018 Runoff	Sec. of State	98.5% (97.9, 99.0)	11.9% (11.4, 12.5)	93.6% (90.1, 96.3)
	Public Serv. Com. 3	98.5% (97.9, 98.9)	9.8% (9.2, 10.4)	92.4% (87.7, 95.8)
2020 General	U.S. President	98.6% (98.1, 99.0)	9.5% (9.0, 10.0)	94.3% (91.6, 96.5)
	U.S. Senator	98.3% (97.7, 98.7)	8.1% (7.6, 8.6)	93.8% (90.7, 96.2)
	Public Serv. Com. 1*	98.4% (97.9, 98.9)	6.6% (6.2, 7.2)	93.9% (91.2, 96.1)
	Public Serv. Com. 4*	98.6% (98.1, 99.0)	6.9% (6.5, 7.4)	95.0% (92.6, 96.7)
2021 Runoff	U.S. Senator (Perdue)	98.8% (98.3, 99.2)	9.8% (9.4, 10.3)	95.8% (93.6, 97.5)
	U.S. Senator (Loeffler)*	98.7% (98.3, 99.1)	10.1% (9.7, 10.6)	95.9% (93.9, 97.3)
	Public Serv. Com. 4*	98.7% (98.3, 99.1)	8.2% (7.7, 8.7)	95.6% (93.4, 97.2)
2022 General	U.S. Senator*	98.6% (98.1, 99.0)	9.9% (9.5, 10.4)	95.9% (94.0, 97.3)
	Governor*	98.4% (97.9, 98.9)	5.5% (5.0, 6.1)	90.6% (87.0, 93.6)
	Lt. Governor	98.1% (97.5, 98.7)	6.6% (6.1, 7.2)	90.8% (87.7, 93.8)
	Sec. of State	97.6% (96.7, 98.3)	5.0% (4.5, 5.6)	86.8% (82.1, 90.8)
	Attorney General	98.5% (98.0, 98.9)	6.8% (6.3, 7.3)	92.8% (90.1, 95.1)
	Com. Agriculture*	98.5% (97.9, 99.0)	5.2% (4.8, 5.7)	91.0% (87.9, 93.5)
	Com. Insurance*	98.3% (97.7, 98.8)	5.3% (4.9, 5.8)	92.2% (88.9, 94.6)
	Com. Labor*	98.5% (98.0, 99.0)	5.8% (5.4, 6.3)	91.8% (88.5, 94.6)
	School Super.*	98.3% (97.7, 98.8)	5.3% (4.8, 6.0)	91.3% (86.8, 94.5)

* Indicates that the Black candidate of choice was Black.

Table 6: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates
— Senate: Southern Atlanta

		Black	White	Other
2012 General	U.S. President*	99.3% (99.1, 99.5)	8.7% (8.4, 9.1)	95.7% (94.4, 96.7)
2014 General	U.S. Senator	99.2% (98.9, 99.4)	12.1% (11.7, 12.5)	95.1% (93.3, 96.6)
	Governor	98.9% (98.6, 99.2)	12.8% (12.3, 13.4)	87.9% (84.9, 90.9)
	Lt. Governor*	98.4% (97.9, 98.8)	8.2% (7.5, 8.8)	75.4% (70.9, 81.0)
	Sec. of State*	98.8% (98.4, 99.1)	8.4% (7.9, 8.9)	79.6% (76.2, 83.2)
	Attorney General	98.5% (98.0, 98.9)	10.5% (9.8, 11.3)	79.7% (75.3, 85.2)
	Com. Agriculture	97.6% (96.4, 98.4)	8.1% (7.3, 9.0)	74.4% (66.6, 84.9)
	Com. Insurance*	98.6% (98.2, 99.0)	8.7% (8.1, 9.3)	82.0% (78.1, 86.1)
	Com. Labor*	98.9% (98.5, 99.2)	8.8% (8.3, 9.4)	82.9% (79.1, 86.8)
	School Super.*	99.0% (98.7, 99.3)	10.1% (9.6, 10.7)	91.4% (88.1, 94.6)
2016 General	U.S. President	99.1% (98.8, 99.3)	10.7% (10.3, 11.1)	94.2% (92.7, 95.5)
	U.S. Senator	96.8% (95.9, 97.8)	8.1% (7.4, 8.9)	80.1% (73.7, 85.7)
2018 General	Governor*	99.3% (99.1, 99.5)	11.2% (10.8, 11.5)	96.2% (95.2, 97.1)
	Lt. Governor	99.1% (98.8, 99.3)	10.7% (10.3, 11.2)	93.6% (91.7, 95.2)
	Sec. of State	99.1% (98.8, 99.3)	11.6% (11.2, 12.0)	95.7% (94.4, 96.7)
	Attorney General	99.1% (98.8, 99.3)	11.2% (10.7, 11.8)	91.8% (89.7, 93.9)
	Com. Agriculture	98.9% (98.5, 99.1)	9.3% (8.8, 9.8)	87.3% (84.9, 89.8)
	Com. Insurance*	99.2% (98.9, 99.4)	10.0% (9.6, 10.5)	94.2% (92.7, 95.5)
	Com. Labor	99.2% (98.9, 99.4)	9.6% (9.2, 10.1)	89.5% (87.6, 91.4)
	School Super.*	99.1% (98.8, 99.3)	9.0% (8.5, 9.4)	88.2% (86.4, 90.3)
	Public Serv. Com. 3	99.2% (98.9, 99.4)	11.2% (10.7, 11.6)	95.0% (93.4, 96.2)
	Public Serv. Com. 5	99.1% (98.8, 99.3)	10.2% (9.8, 10.6)	94.2% (92.4, 95.5)
2018 Runoff	Sec. of State	99.1% (98.8, 99.3)	13.3% (12.9, 13.8)	96.1% (94.6, 97.3)
	Public Serv. Com. 3	99.0% (98.7, 99.3)	14.6% (14.1, 15.1)	96.3% (94.9, 97.4)
2020 General	U.S. President	98.8% (98.4, 99.1)	14.0% (13.4, 14.7)	88.4% (86.0, 90.9)
	U.S. Senator	98.9% (98.5, 99.2)	12.1% (11.5, 12.7)	91.1% (89.0, 93.1)
	Public Serv. Com. 1*	98.9% (98.6, 99.2)	10.2% (9.8, 10.8)	90.8% (88.8, 92.8)
	Public Serv. Com. 4*	98.9% (98.6, 99.2)	10.6% (10.1, 11.2)	92.6% (90.6, 94.5)
2021 Runoff	U.S. Senator (Perdue)	99.1% (98.9, 99.3)	13.1% (12.7, 13.5)	96.9% (95.9, 97.7)
	U.S. Senator (Loeffler)*	99.1% (98.9, 99.4)	13.9% (13.5, 14.4)	97.0% (95.7, 97.9)
	Public Serv. Com. 4*	99.1% (98.8, 99.3)	11.3% (11.0, 11.7)	96.7% (95.6, 97.6)
2022 General	U.S. Senator*	99.1% (98.9, 99.3)	14.6% (14.2, 15.0)	97.0% (95.9, 97.8)
	Governor*	99.0% (98.7, 99.3)	9.9% (9.5, 10.4)	88.3% (86.6, 90.1)
	Lt. Governor	98.9% (98.6, 99.2)	11.0% (10.6, 11.5)	92.1% (90.2, 93.7)
	Sec. of State	98.7% (98.4, 99.0)	10.1% (9.5, 10.6)	80.5% (78.4, 82.7)
	Attorney General	98.8% (98.5, 99.1)	10.9% (10.4, 11.4)	91.6% (89.9, 93.4)
	Com. Agriculture*	99.0% (98.7, 99.3)	9.1% (8.7, 9.6)	89.2% (87.5, 90.8)
	Com. Insurance*	99.0% (98.7, 99.2)	9.5% (9.1, 10.1)	87.5% (85.6, 89.3)
	Com. Labor*	98.9% (98.6, 99.2)	9.8% (9.4, 10.3)	91.7% (90.1, 93.3)
	School Super.*	98.9% (98.6, 99.2)	9.2% (8.8, 9.7)	88.0% (86.3, 89.8)

* Indicates that the Black candidate of choice was Black.

Table 7: Ecological Inference Results — Average Estimated Vote Share of Black-Preferred Candidates by District

	District	Black	White	Other
House: Black Belt	133	94.2% (85.1, 98.7)	15.3% (7.5, 24.1)	64.1% (24.6, 92.3)
	145	94.1% (83.2, 98.9)	10.1% (2.6, 19.2)	72.5% (32.0, 95.4)
	149	96.1% (88.7, 99.0)	6.2% (1.0, 18.1)	71.6% (31.4, 93.7)
House: Southern Atlanta	69	97.9% (94.8, 99.5)	13.7% (4.4, 24.6)	82.2% (55.0, 96.2)
	74	92.5% (75.7, 98.9)	8.1% (2.4, 17.8)	80.1% (42.4, 96.9)
House: Western Atlanta	61	98.7% (96.4, 99.7)	15.3% (6.8, 27.8)	86.4% (61.8, 97.4)
Senate: Black Belt	22	98.2% (96.8, 99.2)	17.1% (10.5, 24.1)	79.4% (52.1, 94.1)
	23	97.5% (90.7, 98.9)	4.5% (1.6, 12.8)	89.2% (70.7, 96.8)
	24	94.9% (90.3, 97.6)	8.5% (4.1, 14.1)	83.9% (45.0, 96.3)
	25	96.0% (91.1, 98.6)	10.9% (6.2, 16.9)	67.3% (32.6, 89.6)
	26	98.6% (96.9, 99.4)	12.2% (7.6, 18.6)	84.2% (50.9, 96.6)
Senate: Southern Atlanta	10	99.0% (98.0, 99.7)	7.1% (2.2, 16.1)	83.5% (41.0, 96.9)
	16	96.0% (92.0, 98.3)	7.5% (4.2, 12.1)	89.6% (75.5, 96.5)
	17	96.9% (92.6, 98.9)	5.1% (2.4, 9.2)	82.2% (60.3, 96.1)
	25	96.0% (91.1, 98.6)	10.9% (6.2, 16.9)	67.3% (32.6, 89.6)
	28	94.7% (87.6, 98.2)	6.4% (2.5, 12.2)	89.5% (69.0, 97.1)
	34	98.9% (97.9, 99.5)	10.1% (4.4, 19.3)	85.6% (56.4, 96.8)
	35	98.9% (97.7, 99.6)	11.2% (4.9, 19.1)	91.0% (72.7, 97.8)
	39	99.0% (98.2, 99.5)	61.4% (44.8, 76.8)	80.6% (50.0, 95.2)
	44	98.5% (96.6, 99.4)	42.1% (21.5, 63.7)	79.3% (33.5, 96.2)

Table 8: Average Performance of Black-Preferred Candidates in Focus Areas and Districts, 2012–2021

Focus Area	District	% Black	% Avg Vote for Black-Preferred Cand.	% Elections Won by Black-Preferred Cand.
House: Black Belt	Focus Area	42.6%	49.3%	37.5%
	133	37.0%	44.9%	0.0%
	142	60.5%	64.1%	100.0%
	143	61.7%	70.6%	100.0%
	145	35.7%	40.4%	0.0%
	147	29.5%	43.0%	0.0%
	149	31.1%	33.7%	0.0%
House: Southern Atlanta	Focus Area	52.5%	60.2%	100.0%
	69	61.9%	71.5%	100.0%
	74	25.2%	34.1%	0.0%
	75	71.3%	86.7%	100.0%
	78	69.4%	80.1%	100.0%
	115	51.3%	55.6%	72.5%
	117	35.9%	42.7%	12.5%
House: Western Atlanta	Focus Area	50.5%	60.9%	100.0%
	61	71.5%	83.9%	100.0%
	64	29.3%	38.4%	0.0%
Senate: Black Belt	Focus Area	40.2%	46.6%	2.5%
	22	56.6%	68.4%	100.0%
	23	34.7%	40.3%	0.0%
	24	19.0%	29.1%	0.0%
	25	33.4%	38.8%	0.0%
	26	57.4%	63.4%	100.0%
Senate: Southern Atlanta	Focus Area	49.0%	59.4%	100.0%
	10	69.0%	78.5%	100.0%
	16	22.3%	31.9%	0.0%
	17	31.2%	35.8%	0.0%
	25	33.4%	38.8%	0.0%
	28	18.8%	29.0%	0.0%
	34	66.6%	82.0%	100.0%
	35	69.8%	79.5%	100.0%
	39	60.3%	85.7%	100.0%
	44	69.1%	86.6%	100.0%

Table 9: Vote Share of Black-Preferred Candidates — Illustrative Maps

		HD 64	HD 74	HD 117	HD 145	HD 149	SD 23	SD 25	SD 28
2012 General	U.S. President	55.6%	56.9%	48.1%	57.4%	65.4%	60.3%	57.9%	67.4%
2014 General	U.S. Senator	57.2%	57.5%	48.9%	52.0%	64.6%	58.3%	59.4%	68.3%
	Governor	56.8%	57.0%	49.0%	52.8%	64.0%	57.3%	59.1%	67.7%
	Lt. Governor	53.3%	53.7%	45.1%	49.0%	60.1%	54.7%	55.5%	64.6%
	Sec. of State	54.1%	54.4%	45.8%	49.7%	61.4%	55.2%	56.3%	65.3%
	Attorney General	54.7%	55.5%	47.2%	50.3%	61.8%	55.1%	57.8%	65.9%
	Com. Agriculture	53.1%	53.2%	45.2%	49.7%	60.7%	54.8%	55.4%	64.0%
	Com. Insurance	55.0%	54.9%	46.7%	50.5%	62.1%	55.9%	57.1%	65.9%
	Com. Labor	55.0%	54.9%	46.5%	50.5%	61.9%	55.6%	56.9%	66.0%
	School Super.	56.2%	56.3%	47.4%	51.8%	63.5%	57.3%	58.1%	67.1%
2016 General	U.S. President	57.1%	59.1%	50.4%	52.5%	61.8%	56.8%	61.8%	67.9%
	U.S. Senator	54.8%	54.9%	47.7%	48.3%	57.5%	52.8%	58.5%	63.7%
2018 General	Governor	62.6%	62.1%	55.4%	54.9%	61.2%	56.3%	67.0%	70.0%
	Lt. Governor	61.8%	61.0%	54.7%	54.4%	60.5%	55.2%	66.2%	68.9%
	Sec. of State	62.3%	61.9%	55.6%	56.0%	62.8%	60.2%	66.9%	69.6%
	Attorney General	62.1%	61.4%	55.3%	54.9%	60.8%	55.9%	66.5%	69.0%
	Com. Agriculture	61.1%	60.2%	53.9%	53.4%	59.0%	54.6%	65.3%	67.9%
	Com. Insurance	61.9%	61.3%	55.2%	54.2%	60.3%	55.5%	66.6%	69.3%
	Com. Labor	61.4%	60.7%	54.2%	53.8%	60.1%	55.3%	65.7%	68.3%
	School Super.	61.0%	60.0%	53.9%	53.7%	59.7%	55.0%	65.3%	68.0%
	Public Serv. Com. 3	62.5%	62.0%	55.5%	55.3%	61.7%	56.3%	66.9%	69.6%
	Public Serv. Com. 5	62.2%	61.4%	55.3%	54.7%	61.0%	56.0%	66.6%	69.2%
2018 Runoff	Sec. of State	57.6%	55.3%	50.2%	53.0%	61.4%	58.5%	62.2%	67.4%
	Public Serv. Com. 3	58.3%	56.0%	50.8%	52.6%	60.9%	56.2%	62.8%	67.9%
2020 General	U.S. President	62.6%	62.2%	59.6%	55.4%	60.7%	56.6%	69.0%	69.2%
	U.S. Senator	62.7%	61.7%	59.4%	54.9%	60.1%	55.7%	69.0%	68.9%
	Public Serv. Com. 1	62.1%	60.8%	58.8%	54.4%	60.2%	55.8%	68.5%	68.2%
	Public Serv. Com. 4	62.6%	61.3%	59.3%	55.0%	60.4%	56.0%	69.0%	68.7%
2021 Runoff	U.S. Senator (Perdue)	64.9%	63.0%	61.6%	57.0%	62.1%	57.5%	71.3%	71.1%
	U.S. Senator (Loeffler)	65.2%	63.3%	61.9%	57.2%	62.4%	57.7%	71.6%	71.5%
	Public Serv. Com. 4	64.4%	62.1%	60.8%	56.4%	61.5%	56.8%	70.7%	70.5%

Table 10: List of Candidates in Statewide Elections, 2012–2022

		Democratic Candidate	Dem. Cand. Race	Republican Candidate	Rep. Cand. Race
2012 General	U.S. President	Barack Obama	Black	Mitt Romney	White
2014 General	U.S. Senator	Michelle Nunn	White	David Perdue	White
	Governor	Jason Carter	White	John Nathan Deal	White
	Lt. Governor	Connie Stokes	Black	L. S. 'Casey' Cagle	White
	Sec. of State	Doreen Carter	Black	Brian Kemp	White
	Attorney General	Gregory Hecht	White	Samuel Olens	White
	Com. Agriculture	Christopher Irvin	White	Gary Black	White
	Com. Insurance	Elizabeth Johnson	Black	Ralph Hudgens	White
	Com. Labor	Robbin Shipp	Black	J. Mark Butler	White
	School Super.	Valarie Wilson	Black	Richard Woods	White
2016 General	U.S. President	Hillary Clinton	White	Donald Trump	White
	U.S. Senator	Jim Barksdale	White	Johnny Isakson	White
2018 General	Governor	Stacey Abrams	Black	Brian Kemp	White
	Lt. Governor	Sarah Riggs Amico	White	Geoff Duncan	White
	Sec. of State	John Barrow	White	Brad Raffensperger	White
	Attorney General	Charlie Bailey	White	Chris Carr	White
	Com. Agriculture	Fred Swann	White	Gary Black	White
	Com. Insurance	Janice Laws	Black	Jim Beck	White
	Com. Labor	Richard Keatley	White	Mark Butler	White
	School Super.	Otha Thornton	Black	Richard Woods	White
	Public Serv. Com. 3	Lindy Miller	White	Chuck Eaton	White
	Public Serv. Com. 5	Dawn Randolph	White	Tricia Pridemore	White
2018 Runoff	Sec. of State	John Barrow	White	Brad Raffensperger	White
	Public Serv. Com. 3	Lindy Miller	White	Chuck Eaton	White
2020 General	U.S. President	Joe Biden	White	Donald Trump	White
	U.S. Senator	Jon Ossoff	White	David Perdue	White
	Public Serv. Com. 1	Robert Bryant	Black	Jason Shaw	White
	Public Serv. Com. 4	Daniel Blackman	Black	Lauren McDonald	White
2021 Runoff	U.S. Senator (Perdue)	Jon Ossoff	White	David Perdue	White
	U.S. Senator (Loeffler)	Raphael Warnock	Black	Kelly Loeffler	White
	Public Serv. Com. 4	Daniel Blackman	Black	Lauren McDonald	White
2022 General	U.S. Senator	Raphael Warnock	Black	Herschel Junior Walker	Black
	Governor	Stacey Abrams	Black	Brian Kemp	White
	Lt. Governor	Charlie Bailey	White	Burt Jones	White
	Sec. of State	Bee Nguyen	Asian	Brad Raffensperger	White
	Attorney General	Jennifer "Jen" Jordan	White	Chris Carr	White
	Com. Agriculture	Nakita Hemingway	Black	Tyler Harper	White
	Com. Insurance	Janice Laws Robinson	Black	John King	White
	Com. Labor	William "Will" Boddie, Jr	Black	Bruce Thompson	White
	School Super.	Alisha Thomas Searcy	Black	Richard Woods	White

* Excludes candidates in the 2020 Special Election for U.S. Senate

Maxwell Palmer

CONTACT	<p>Department of Political Science Boston University 232 Bay State Road Boston, MA 02215</p> <p><i>E-mail:</i> mbpalmer@bu.edu <i>Website:</i> www.maxwellpalmer.com <i>Phone:</i> (617) 358-2654</p>
APPOINTMENTS	<p>Boston University, Boston, Massachusetts</p> <p>Associate Professor, Department of Political Science, 2021–Present</p> <p>Director of Advanced Programs, Dept. of Political Science, 2020–Present</p> <p>Civic Tech Fellow, Faculty of Computing & Data Sciences, 2021–Present</p> <p>Faculty Fellow, Initiative on Cities, 2019–Present</p> <p>Assistant Professor, Department of Political Science, 2014–2021</p> <p>Junior Faculty Fellow, Hariri Institute for Computing, 2017–2020</p>
EDUCATION	<p>Harvard University, Cambridge, Massachusetts</p> <p>Ph.D., Political Science, May 2014.</p> <p>A.M., Political Science, May 2012.</p> <p>Bowdoin College, Brunswick, Maine</p> <p>A.B., Mathematics & Government and Legal Studies, May 2008.</p>
BOOK	<p><i>Neighborhood Defenders: Participatory Politics and America’s Housing Crisis</i> (with Katherine Levine Einstein and David M. Glick). 2019. New York, NY: Cambridge University Press.</p> <ul style="list-style-type: none"> – Selected chapters republished in <i>Political Science Quarterly</i>. – Reviewed in <i>Perspectives on Politics</i>, <i>Political Science Quarterly</i>, <i>Economics 21</i>, <i>Public Books</i>, and <i>City Journal</i>. – Covered in Vox’s “The Weeds” podcast, CityLab, Slate’s “Gabfest,” Curbed, Brookings Institution Up Front.
REFEREED ARTICLES	<p>Einstein, Katherine Levine, Joseph Ornstein, and Maxwell Palmer. 2022. “Who Represents the Renters?” <i>Housing Policy Debate</i>.</p> <p>Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2022. “Developing a pro-housing movement? Public distrust of developers, fractured coalitions, and the challenges of measuring political power.” <i>Interest Groups & Advocacy</i> 11:189–208.</p>

Einstein, Katherine Levine, David Glick, Luisa Godinez Puig, and Maxwell Palmer. 2022. “Still Muted: The Limited Participatory Democracy of Zoom Public Meetings.” *Urban Affairs Review*.

Glick, David M. and Maxwell Palmer. 2022. “County Over Party: How Governors Prioritized Geography Not Particularism in the Distribution of Opportunity Zones.” *British Journal of Political Science* 52(4): 1902–1910.

de Benedictis-Kessner, Justin and Maxwell Palmer. 2021. “Driving Turnout: The Effect of Car Ownership on Electoral Participation.” *Political Science Research and Methods*.

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Godinez Puig, Luisa, Katharine Lusk, David Glick, Katherine L. Einstein, Maxwell Palmer, Stacy Fox, and Monica L. Wang. 2020. “Perceptions of Public Health Priorities and Accountability Among US Mayors.” *Public Health Reports* (October 2020).

Einstein, Katherine Levine, David M. Glick, and Maxwell Palmer. 2020. “Can Mayors Lead on Climate Change? Evidence from Six Years of Surveys.” *The Forum* 18(1).

Ban, Pamela, Maxwell Palmer, and Benjamin Schneer. 2019. “From the Halls of Congress to K Street: Government Experience and its Value for Lobbying.” *Legislative Studies Quarterly* 44(4): 713–752.

Palmer, Maxwell and Benjamin Schneer. 2019. “Postpolitical Careers: How Politicians Capitalize on Public Office.” *Journal of Politics* 81(2): 670–675.

Einstein, Katherine Levine, Maxwell Palmer, and David M. Glick. 2019. “Who Participates in Local Government? Evidence from Meeting Minutes.” *Perspectives on Politics* 17(1): 28–46.

- Winner of the **Heinz Eulau Award**, American Political Science Association, 2020.

Einstein, Katherine Levine, David M. Glick, and Maxwell Palmer. 2019. “City Learning: Evidence of Policy Information Diffusion From a Survey of U.S. Mayors.” *Political Research Quarterly* 72(1): 243–258.

Einstein, Katherine Levine, David M. Glick, Maxwell Palmer, and Robert Pressel. 2018. “Do Mayors Run for Higher Office? New Evidence on Progressive Ambition.” *American Politics Research* 48(1) 197–221.

Ansolabehere, Stephen, Maxwell Palmer and Benjamin Schneer. 2018. “**Divided Government and Significant Legislation, A History of Congress from 1789-2010.**” *Social Science History* 42(1): 81–108.

Edwards, Barry, Michael Crespín, Ryan D. Williamson, and Maxwell Palmer. 2017. “**Institutional Control of Redistricting and the Geography of Representation.**” *Journal of Politics* 79(2): 722–726.

Palmer, Maxwell. 2016. “**Does the Chief Justice Make Partisan Appointments to Special Courts and Panels?**” *Journal of Empirical Legal Studies* 13(1): 153–177.

Palmer, Maxwell and Benjamin Schneer. 2016. “**Capitol Gains: The Returns to Elected Office from Corporate Board Directorships.**” *Journal of Politics* 78(1): 181–196.

Gerring, John, Maxwell Palmer, Jan Teorell, and Dominic Zarecki. 2015. “**Demography and Democracy: A Global, District-level Analysis of Electoral Contestation.**” *American Political Science Review* 109(3): 574–591.

OTHER PUBLICATIONS

Einstein, Katherine Levine, David M. Glick and Maxwell Palmer. 2020. “**Neighborhood Defenders: Participatory Politics and America’s Housing Crisis.**” *Political Science Quarterly* 135(2): 281–312.

Ansolabehere, Stephen and Maxwell Palmer. 2016. “**A Two Hundred-Year Statistical History of the Gerrymander.**” *Ohio State Law Journal* 77(4): 741–762.

Ansolabehere, Stephen, Maxwell Palmer, and Benjamin Schneer. 2016. “**What Has Congress Done?**” in *Governing in a Polarized Age: Elections, Parties, and Political Representation in America*, eds. Alan Gerber and Eric Schickler. New York, NY: Cambridge University Press.

POLICY REPORTS

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2022. **Looking back on ARPA and America’s Cities: A Menino Survey Reflection.** Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine and Maxwell Palmer. 2022. **Representation in the Housing Process: Best Practices for Improving Racial Equity.** Research Report. The Boston Foundation.

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2022. **2021 Menino Survey of Mayors: Closing the Racial Wealth Gap.** Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2021. **2021**

Menino Survey of Mayors: Building Back Better. Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, Maxwell Palmer, Stacy Fox, Katharine Lusk, Nicholas Henninger, and Songhyun Park. 2021. *2020 Menino Survey of Mayors: Policing and Protests*. Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, Maxwell Palmer, and Stacy Fox. 2020. *2020 Menino Survey of Mayors: COVID-19 Recovery and the Future of Cities*. Research Report. Boston University Initiative on Cities.

de Benedictis-Kessner, Justin and Maxwell Palmer. 2020. *Got Wheels? How Having Access to a Car Impacts Voting*. *Democracy Docket*.

Palmer, Maxwell, Katherine Levine Einstein, and David Glick. 2020. *Counting the City: Mayoral Views on the 2020 Census*. Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine, Maxwell Palmer, Stacy Fox, Marina Berardino, Noah Fischer, Jackson Moore-Otto, Aislinn O'Brien, Marilyn Rutecki and Benjamin Wuesthoff. 2020. *COVID-19 Housing Policy*. Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine, Maxwell Palmer, David Glick, and Stacy Fox. 2020. *Mayoral Views on Cities' Legislators: How Representative are City Councils?* Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine and Maxwell Palmer. 2020. *"Newton and other communities must reform housing approval process."* *The Boston Globe*.

Einstein, Katherine Levine, David Glick, Maxwell Palmer and Stacy Fox. 2020. *"2019 Menino Survey of Mayors."* Research Report. Boston University Initiative on Cities.

Palmer, Maxwell, Katherine Levine Einstein, David Glick, and Stacy Fox. 2019. *Mayoral Views on Housing Production: Do Planning Goals Match Reality?* Research Report. Boston University Initiative on Cities.

Wilson, Graham, David Glick, Katherine Levine Einstein, Maxwell Palmer, and Stacy Fox. 2019. *Mayoral Views on Economic Incentives: Valuable Tools or a Bad Use of Resources?*. Research Report. Boston University Initiative on Cities

Einstein, Katherine Levine, David Glick, Maxwell Palmer and Stacy Fox. 2019. *"2018 Menino Survey of Mayors."* Research Report. Boston University Initiative

on Cities.

Einstein, Katherine Levine, Katharine Lusk, David Glick, Maxwell Palmer, Christiana McFarland, Leon Andrews, Aliza Wasserman, and Chelsea Jones. 2018. *“Mayoral Views on Racism and Discrimination.”* National League of Cities and Boston University Initiative on Cities.

Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2018. *“As the Trump administration retreats on climate change, US cities are moving forward.”* The Conversation.

Einstein, Katherine Levine, David M. Glick, Maxwell Palmer, and Robert Presel. 2018. *“Few big-city mayors see running for higher office as appealing.”* LSE United States Politics and Policy Blog.

Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2018. *“2017 Menino Survey of Mayors.”* Research Report. Boston University Initiative on Cities.

Williamson, Ryan D., Michael Crespin, Maxwell Palmer, and Barry C. Edwards. 2017. *“This is how to get rid of gerrymandered districts.”* *The Washington Post*, Monkey Cage Blog.

Palmer, Maxwell and Benjamin Schneer. 2015. *“How and why retired politicians get lucrative appointments on corporate boards.”* *The Washington Post*, Monkey Cage Blog.

CURRENT PROJECTS

“A Partisan Solution to Partisan Gerrymandering: The Define-Combine Procedure” (with Benjamin Schneer and Kevin DeLuca).

– Covered in *Fast Company*

“Descended from Immigrants and Revolutionists: How Family Immigration History Shapes Legislative Behavior in Congress” (with James Feigenbaum and Benjamin Schneer).

“The Gender Pay Gap in Congressional Offices” (with Joshua McCrain).

“Racial Disparities in Local Elections” (with Katherine Levine Einstein).

“Renters in an Ownership Society: Property Rights, Voting Rights, and the Making of American Citizenship.” Book Project. With Katherine Levine Einstein.

“Menino Survey of Mayors 2021.” Co-principal investigator with David M. Glick and Katherine Levine Einstein.

GRANTS
AND AWARDS

The Boston Foundation Grant. “2022 Greater Boston Housing Report Card” (Co-principal investigator). 2022. \$70,000.

The Rockefeller Foundation, “Menino Survey of Mayors” (Co-principal investigator). 2021. \$355,000.

American Political Science Association, **Heinz Eulau Award**, for the best article published in *Perspectives on Politics* during the previous calendar year, for “**Who Participates in Local Government? Evidence from Meeting Minutes.**” (with Katherine Levine Einstein and David M. Glick). 2020.

Boston University Initiative on Cities, COVID-19 Research to Action Seed Grant. “How Are Cities Responding to the COVID-19 Housing Crisis?” 2020. \$8,000.

The Rockefeller Foundation, “Menino Survey of Mayors” (Co-principal investigator). 2017. \$325,000.

Hariri Institute for Computing, Boston University. Junior Faculty Fellow. 2017–2020. \$10,000.

The Rockefeller Foundation, “2017 Menino Survey of Mayors” (Co-principal investigator). 2017. \$100,000.

The Center for Finance, Law, and Policy, Boston University, Research Grant for “From the Capitol to the Boardroom: The Returns to Office from Corporate Board Directorships,” 2015.

Senator Charles Sumner Prize, Dept. of Government, Harvard University. 2014.
Awarded to the best dissertation “from the legal, political, historical, economic, social or ethnic approach, dealing with means or measures tending toward the prevention of war and the establishment of universal peace.”

The Center for American Political Studies, Dissertation Research Fellowship on the Study of the American Republic, 2013–2014.

The Tobin Project, Democracy and Markets Graduate Student Fellowship, 2013–2014.

The Dirksen Congressional Center, Congressional Research Award, 2013.

The Institute for Quantitative Social Science, Conference Travel Grant, 2014.

The Center for American Political Studies, Graduate Seed Grant for “Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” 2014.

The Institute for Quantitative Social Science, Research Grant, 2013.

Bowdoin College: High Honors in Government and Legal Studies; Philo Sherman Bennett Prize for Best Honors Thesis in the Department of Government, 2008.

SELECTED
PRESENTATIONS

“A Partisan Solution to Partisan Gerrymandering: The Define-Combine Procedure.” MIT Election Data and Science Lab, 2020.

“Who Represents the Renters?” Local Political Economy Conference, Washington, D.C., 2019.

“Housing and Climate Politics,” Sustainable Urban Systems Conference, Boston University 2019.

“Redistricting and Gerrymandering,” American Studies Summer Institute, John F. Kennedy Presidential Library and Museum, 2019.

“The Participatory Politics of Housing,” Government Accountability Office Seminar, 2018.

“Descended from Immigrants and Revolutionists: How Immigrant Experience Shapes Immigration Votes in Congress,” Congress and History Conference, Princeton University, 2018.

“Identifying Gerrymanders at the Micro- and Macro-Level.” Hariri Institute for Computing, Boston University, 2018.

“How Institutions Enable NIMBYism and Obstruct Development,” Boston Area Research Initiative Spring Conference, Northeastern University, 2017.

“Congressional Gridlock,” American Studies Summer Institute, John F. Kennedy Presidential Library and Museum, 2016.

“Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” Microeconomics Seminar, Department of Economics, Boston University, 2015.

“A Two Hundred-Year Statistical History of the Gerrymander,” Congress and History Conference, Vanderbilt University, 2015.

“A New (Old) Standard for Geographic Gerrymandering,” Harvard Ash Center Workshop: How Data is Helping Us Understand Voting Rights After Shelby County, 2015.

“Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” Boston University Center for Finance, Law, and Policy, 2015.

“Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” Bowdoin College, 2014.

American Political Science Association: 2013, 2014, 2015, 2016, 2018, 2019, 2020

Midwestern Political Science Association: 2012, 2013, 2014, 2017, 2019

Southern Political Science Association: 2015, 2018

European Political Science Association: 2015

EXPERT
TESTIMONY
AND CONSULTING

Bethune-Hill v. Virginia (3:14-cv-00852-REP-AWA-BMK), U.S. District Court for the Eastern District of Virginia. Prepared expert reports and testified on racial predominance and racially polarized voting in selected districts of the 2011 Virginia House of Delegates map. (2017)

Thomas v. Bryant (3:18-CV-441-CWR-FKB), U.S. District Court for the Southern District of Mississippi. Prepared expert reports and testified on racially polarized voting in a district of the 2012 Mississippi State Senate map. (2018–2019)

Chestnut v. Merrill (2:18-cv-00907-KOB), U.S. District Court for the Northern District of Alabama. Prepared expert reports and testified on racially polarized voting in selected districts of the 2011 Alabama congressional district map. (2019)

Dwight v. Raffensperger (No. 1:18-cv-2869-RWS), U.S. District Court for the Northern District of Georgia. Prepared expert reports and testified on racially polarized voting in selected districts of the 2011 Georgia congressional district map. (2019)

Bruni, et al. v. Hughes (No. 5:20-cv-35), U.S. District Court for the Southern District of Texas. Prepared expert reports and testified on the use of straight-ticket voting by race and racially polarized voting in Texas. (2020)

Caster v. Merrill (No. 2:21-cv-1536-AMM), U.S. District Court for the Northern District of Alabama. Prepared expert report and testified on racially polarized voting in selected districts of the 2021 Alabama congressional district map. (2022)

Pendergrass v. Raffensperger (1:21-CV-05339-SCJ), U.S. District Court for the Northern District of Georgia. Prepared expert reports and testified on racially polarized voting in selected districts of the 2021 Georgia congressional district map. (2022)

Grant v. Raffensperger (1:22-CV-00122-SCJ), U.S. District Court for the Northern District of Georgia. Prepared expert reports and testified on racially polarized voting in selected districts of the 2021 Georgia state legislative district maps.

(2022)

Galmon, et al. v. Ardoin (3:22-cv-00214-SDD-SDJ), U.S. District Court for the Middle District of Louisiana. Prepared expert reports and testified on racially polarized voting for the 2021 Louisiana congressional district map. (2022)

Racially Polarized Voting Consultant, Virginia Redistricting Commission, August 2021.

The General Court of the Commonwealth of Massachusetts, Joint Committee on Housing, Hearing on Housing Production Legislation. May 14, 2019. Testified on the role of public meetings in housing production.

TEACHING

Boston University

- *Introduction to American Politics* (PO 111; Fall 2014, Fall 2015, Fall 2016, Fall 2017, Spring 2019, Fall 2019, Fall 2020)
- *Congress and Its Critics* (PO 302; Fall 2014, Spring 2015, Spring 2017, Spring 2019)
- *Data Science for Politics* (PO 399; Spring 2020, Spring 2021, Fall 2021, Fall 2022)
- *Formal Political Theory* (PO 501; Spring 2015, Spring 2017, Fall 2019, Fall 2020)
- *American Political Institutions in Transition* (PO 505; Spring 2021, Fall 2021)
- *Prohibition* (PO 540; Fall 2015, Fall 2022)
- *Political Analysis (Graduate Seminar)* (PO 840; Fall 2016, Fall 2017)
- *Graduate Research Workshop* (PO 903/4; Fall 2019, Spring 2020)

SERVICE

Boston University

- Research Computing Governance Committee, 2021–.
- Initiative on Cities Faculty Advisory Board, 2020–2022.
- Undergraduate Assessment Working Group, 2020–2021.
- College of Arts and Sciences
 - Search Committee for the Faculty Director of the Initiative on Cities, 2020–2021.
 - General Education Curriculum Committee, 2017–2018.
- Department of Political Science
 - Director of Advanced Programs (Honors & B.A./M.A.). 2020–.
 - Political Methodology Search Committee, 2021.

- Delegate, Chair Selection Advisory Process, 2021.
- Comprehensive Exam Committee, American Politics, 2019.
- Comprehensive Exam Committee, Political Methodology, 2016, 2017, 2021.
- Co-organizer, Research in American Politics Workshop, 2016–2018.
- American Politics Search Committee, 2017.
- American Politics Search Committee, 2016.
- Graduate Program Committee, 2014–2015, 2018–2019, 2020–2021.

Co-organizer, *Boston University Local Political Economy Conference*, August 29, 2018.

Editorial Board Member, *Legislative Studies Quarterly*, 2020–Present

Malcolm Jewell Best Graduate Student Paper Award Committee, Southern Political Science Association, 2019.

Reviewer: *American Journal of Political Science*; *American Political Science Review*; *Journal of Politics*; *Quarterly Journal of Political Science*; *Science*; *Political Analysis*; *Legislative Studies Quarterly*; *Public Choice*; *Political Science Research and Methods*; *Journal of Law, Economics and Organization*; *Election Law Journal*; *Journal of Empirical Legal Studies*; *Urban Affairs Review*; *Applied Geography*; *PS: Political Science & Politics*; Cambridge University Press; Oxford University Press.

Elected Town Meeting Member, Town of Arlington, Mass., Precinct 2. April 2021–Present.

Arlington Election Reform Committee Member, August 2019–April 2022.

Coordinator, **Harvard Election Data Archive**, 2011–2014.

OTHER
EXPERIENCE

Charles River Associates, Boston, Massachusetts 2008–2010

Associate, Energy & Environment Practice

Economic consulting in the energy sector for electric and gas utilities, private equity, and electric generation owners. Specialized in Financial Modeling, Resource Planning, Regulatory Support, Price Forecasting, and Policy Analysis.

Updated December 12, 2022

EXHIBIT 3

Supplemental Expert Report of Dr. Maxwell Palmer

Grant v. Raffensperger (N.D. Ga.)

December 22, 2022



SUPPLEMENTAL EXPERT REPORT OF MAXWELL PALMER, PH.D.

I, Dr. Maxwell Palmer, declare as follows:

1. In my original report in this matter I examined racially polarized voting across five “focus areas” in Georgia.¹ I analyzed 40 statewide elections in these areas and found high levels of racially polarized voting across all five focus areas.
2. I have been asked to supplement my original report by analyzing the state legislative election results for the the 2022 general election in the districts that make up the focus areas. These elections are commonly referred to as “endogenous elections.” Of the 27 districts that make up the focus areas, eleven were contested in the 2022 general elections.² Of the eleven that were contested, four districts (HDs 64, 75, 117, and 147) had fewer than 15 precincts, and I am not able to estimate levels of racially polarized voting in these districts.
3. In this supplemental report I rely on the same data (precinct-level election results and precinct-level voter turnout by race) as in my original report. I use the same methodology (ecological inference) to perform my analysis.
4. I find strong evidence of racially polarized voting across all seven districts contested in the 2022 general election that I was able to analyze. Black and White voters supported different candidates in all seven districts.
5. Black-preferred candidates for the state legislature were defeated in every majority-White district, and elected in every majority-Black district.
6. Figure 1 presents the estimates of support for the Black-preferred candidate for Black and White voters for each state legislative election in 2022. Full results for each election are presented in Table 1. Figure 1 shows that the estimates for support for Black-preferred candidates by Black voters are all significantly above 50%. Black voters are extremely cohesive, with a clear candidate of choice in all five districts. White voters are highly cohesive in voting in *opposition* to the Black-preferred candidate in every district.

¹(1) House Black Belt: HDs 133, 142, 143, 145, 147, and 149; (2) House Southern Atlanta: HDs 69, 74, 75, 78, 115, and 117; (3) House Western Atlanta: HDs 61 and 64; (4) Senate Black Belt: SDs 22, 23, 24, 25, and 26; (5) Senate Southern Atlanta: SDs 10, 16, 17, 25, 28, 34, 35, 39, and 44.

²The *uncontested* elections were: (1) in the House Black Belt focus area: HDs 142, 143, 145, and 149; (2) in the House Southern Atlanta focus area: HDs 69, 78, and 115; (3) in the House Western Atlanta focus area: HD 61; (4) in the Senate Black Belt focus area: SDs 23, 24, and 26; and (5) in the Senate Southern Atlanta focus area: SDs 10, 28, 35, 39, and 44.

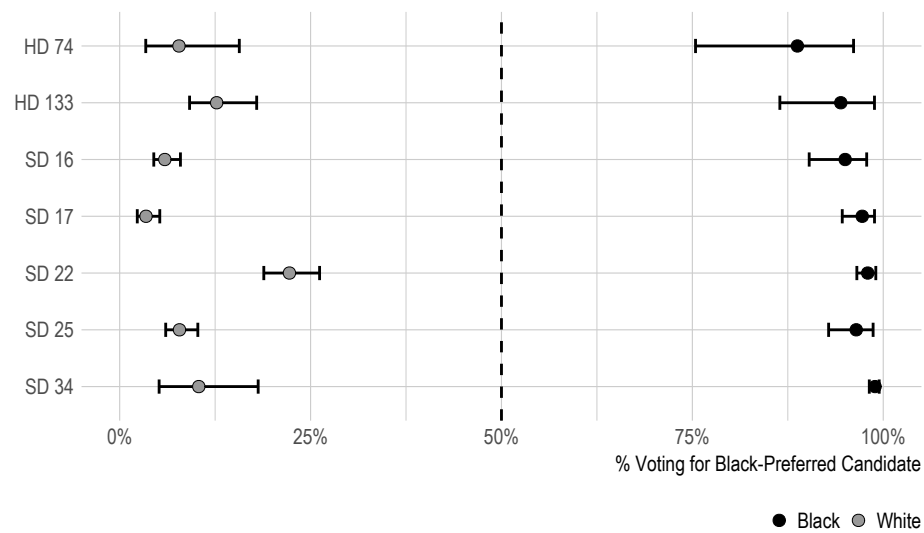


Figure 1: Racially Polarized Voting Estimates by State Legislative District

Table 1: Ecological Inference Results

District	Black	White	Other
HD 74	88.8% (75.4, 96.1)	7.8% (3.4, 15.7)	81.8% (51.8, 96.2)
HD 133	94.4% (86.5, 98.9)	12.7% (9.2, 17.9)	66.5% (33.5, 90.3)
SD 16	95.0% (90.3, 97.8)	5.9% (4.5, 8.0)	86.0% (75.3, 93.1)
SD 17	97.2% (94.6, 98.9)	3.4% (2.3, 5.3)	82.6% (74.4, 89.0)
SD 22	98.0% (96.5, 99.0)	22.2% (18.9, 26.2)	82.7% (72.0, 91.5)
SD 25	96.5% (92.8, 98.7)	7.8% (6.0, 10.2)	74.8% (57.6, 88.2)
SD 34	98.9% (98.2, 99.5)	10.4% (5.2, 18.1)	90.6% (83.3, 95.8)

Table 2: State Legislative Election Results

	District	Dem. %	Rep. %
House	HD 61	100.0%	0.0%
	HD 64	42.5%	57.5%
	HD 69	100.0%	0.0%
	HD 74	36.3%	63.7%
	HD 75	88.5%	11.5%
	HD 78	100.0%	0.0%
	HD 115	100.0%	0.0%
	HD 117	49.3%	50.7%
	HD 133	42.5%	57.5%
	HD 142	100.0%	0.0%
	HD 143	100.0%	0.0%
	HD 145	0.0%	100.0%
	HD 147	44.2%	55.8%
	HD 149	0.0%	100.0%
Senate	SD 10	100.0%	0.0%
	SD 16	31.8%	68.2%
	SD 17	38.4%	61.6%
	SD 22	70.4%	29.6%
	SD 23	0.0%	100.0%
	SD 24	0.0%	100.0%
	SD 25	38.3%	61.7%
	SD 26	100.0%	0.0%
	SD 28	0.0%	100.0%
	SD 34	83.7%	16.3%
	SD 35	100.0%	0.0%
	SD 39	100.0%	0.0%
	SD 44	100.0%	0.0%

EXHIBIT 4

***Grant et al. v. Raffensperger, et al.*, No. 1:22-cv-00122**
United States District Court for the Northern District of Georgia
Expert Report of Orville Vernon Burton, Ph.D.

A handwritten signature in black ink, appearing to read "Orville Burton", is positioned above a horizontal line.

Dr. Orville Vernon Burton

December 5, 2022

I. STATEMENT OF INQUIRY

I have been asked by Plaintiffs' counsel to serve as an expert witness in litigation concerning Georgia redistricting. Plaintiffs' counsel asked me to analyze the history of voting-related discrimination in Georgia and to contextualize and put in historical perspective such discrimination. I have also been asked to analyze the relationship between race and partisanship in Georgia politics.

I am being compensated at \$350 per hour for my work on this case. My compensation is not contingent on or affected by the substance of my opinions or the outcome of this case.

II. SUMMARY OF FINDINGS

Throughout Georgia's history, and through today, the state of Georgia has attempted, often successfully, to minimize the electoral influence of minority voters and particularly of Black Georgians. Voting rights in Georgia have followed a pattern where after periods of increased nonwhite voter registration and turnout, the state, through both legislation and extralegal means, finds methods to disfranchise and reduce the influence of minority voters.

This history has its roots in the Reconstruction era. As soon as formerly enslaved men gained the right to vote in Georgia, both violence and wholesale changes in voter registration laws ensured they could not vote. By the early 20th century, the cumulative effects of the poll tax and the white primary had nearly removed all Black Georgians from voter registration lists. Around this time, Georgia also structured its elections to the disadvantage of Black Georgians. Specifically, Georgia's county unit system, introduced in 1917 until it was outlawed by the Supreme Court in the 1960s, gave a greater share of proportion of votes to small, rural, and much whiter counties, compared to larger and more urban counties, where the majority of Black Georgia voters lived.

When the Supreme Court eventually ruled against white-only primaries in the 1940s, Georgia worked to circumvent the ability of those citizens to vote through registration schemes, voter challenges, voter purges, and more. And when the county-unit system fell, Georgia replaced them with at-large districts and majority vote requirements, systems designed to ensure that Black candidates could not be elected to office. Those systems were wildly effective: By the time of the 1964 Civil Rights Act (CRA) and the 1965 Voting Rights Act (VRA), while Black Georgians were 34 percent of the voting age population, there were only three Black elected officials in Georgia.

Even after the Voting Rights Act of 1965, Black voters and Black elected officials in Georgia continued to be systematically underrepresented. To neutralize Black voting strength, Georgia officials used an array of mechanisms to block, discourage, dilute, or otherwise prevent or limit Black voting in Georgia. Between 1965-1980, nearly 30% of all of the Department of Justice's objections to voting-related changes under Section 5 were attributable to Georgia alone.

For the next forty years, Georgia failed to go a redistricting cycle without objection from the Department of Justice (DOJ). Georgia's congressional reapportionment in 1971, for example, was the first held under Section 5 preclearance rules, and it showed, as one expert has described, "the extraordinary lengths to which the legislature was prepared to go to exclude Blacks from the congressional delegation." After DOJ refused to preclear the plan and required Georgia to implement a new congressional plan, Andrew Young became the only Black U.S. Congressman from Georgia and the first African American elected to the United States House of Representatives from the South in the twentieth century (along with Barbara Jordan of Texas, significantly both Black candidates were elected from urban districts). In the redistricting cycle after the 1980 census, the Georgia General Assembly again tried to limit Black voting strength in Atlanta. DOJ again refused to preclear the plan; John Lewis eventually won the seat that was created under the revised congressional plan. When Congress did re-authorize the VRA in 1982, it cited systemic abuses by Georgia officials to evade Black voting rights.

Notably, the tactics that have plagued Georgia's history to dilute the power of Black Georgians have persisted into the modern era. These policies around voting have also come at a time of rapid demographic shifts in Georgia's electorate: Georgia is the only state in the Deep South where the percentage of the Black population has sharply increased over the past half century. In just the past ten years, much of it in the wake of *Shelby County v. Holder* (2013), Georgia has slashed polling places by the hundreds (primarily in Black communities), increased voter purges and challenges against minority voters, launched state-sponsored investigations against minority voting groups, and more. In just the past year, Georgia enacted Senate Bill 202, a law DOJ could no longer stop under preclearance but which DOJ has alleged was passed with the intent and effect of limiting Black Georgians' voting power. While that suit remains to be litigated, the state has already begun replacing Black office holders in majority-Black counties and implementing policies to the disadvantage of Black Georgians.

The history of Georgia demonstrates a clear pattern, one that attempts (and often succeeds) in diluting and impairing Black Georgians' voting power. Georgia's recently enacted congressional plan must be viewed in this context.

This pattern, moreover, is reflected in Georgia's politics. Race is a central feature of politics in Georgia. Though race is central to any explanation of the modern party system in the South, and particularly in Georgia, racial identification is a complex phenomenon. A variety of factors, such as the racial context of an election, contribute to the importance of race in partisan politics. While the degree may vary, race is always a factor in southern campaigns.¹ As Valentino and Sears note, "race has been a dominant element in Southern politics from the beginning."²

As discussed at length below, as a historical matter, the alignment in Georgia of Black voters with the Democratic Party and white voters with the Republican Party that we see today stems from the Civil Rights Act of 1964 (CRA) and the Voting Rights Act of 1965 (VRA). It is worth noting that this realignment that began in the 1960s was not the result of a new issue which redefined partisan politics; instead, it was caused by new divisions based on an old issue. Southern whites, even today, continue to be antagonistic towards policies designed to promote the political, economic, and social progress of minorities.³ However, it is clear that the explicitly race-based policies of the 1960s sparked the formation of the political alignment of Black and white voters that we see today in Georgia.

It is equally worth noting that my discussion here is not meant to, and does not, suggest in any way that all voters who identify with the Republican Party in Georgia are racist. Instead, it is meant to show that race unquestionably contributes to Georgia's partisan divides today, and, similarly, that those divides cannot be fully explained without discussing race.

III. EXPERT CREDENTIALS

A. Professional Background and Qualifications

¹ James M. Glaser, *Race, Campaign Politics, and the Realignment in the South* (New Haven: Yale University Press, 1996), 25-26, 43.

² Nicholas A. Valentino and David O. Sears. "Old Times There Are Not Forgotten: Race and Partisan Realignment in the Contemporary South," *American Journal of Political Science*. vol. 49, no. 3 (2005), 672-688.

³ James M. Glaser, *Race, Campaign Politics, and the Realignment in the South* (New Haven: Yale University Press, 1996), 17, 19.

I received my undergraduate degree from Furman University in 1969 and my Ph.D. in American History from Princeton University in 1976 and have been researching and teaching American History at universities since 1971. Currently I am the Judge Matthew J. Perry Distinguished Professor of History, and Professor of Global Black Studies, Sociology and Anthropology, and Computer Science at Clemson University. From 2008 to 2010, I was the Burroughs Distinguished Professor of Southern History and Culture at Coastal Carolina University. I am emeritus University Distinguished Teacher/Scholar, Professor of History, African American Studies, and Sociology at the University of Illinois. I am a Senior Research Scientist at the National Center for Supercomputing Applications (NCSA) where I was Associate Director for Humanities and Social Sciences (2004-2010). I was also the founding Director of the Institute for Computing in Humanities, Arts, and Social Science (ICHASS) at the University of Illinois and currently chair the ICHASS Advisory Board.

I am the author or editor of more than twenty books and nearly three hundred articles, which can be found on my Curriculum Vitae attached to the end of this report. I have received a number of academic awards and honors. I was selected nationwide as the 1999 U.S. Research and Doctoral University Professor of the Year (presented by the Carnegie Foundation for the Advancement of Teaching and by the Council for Advancement and Support of Education). I have been recognized by my peers and was elected president of the Southern Historical Association and of the Agricultural History Society and elected to the Society of American Historians. In 2016, I received the College of Architecture, Art, and Humanities Dean's Award for "Excellence in Research." In 2017, I received the Governor's Award for Lifetime Achievement in the Humanities from the South Carolina Humanities Council and in 2021 I was awarded the Benjamin E. Mays Legacy Award. In 2018, I was part of the initial Clemson University Research, Scholarship and Artistic Achievement Award group of scholars. In 2022, I received the Clemson University Alumni Award for Outstanding Achievements in Research and was appointed to the South Carolina African American Heritage Commission, inducted into the Morehouse College Martin Luther King, Jr. Collegium of Scholars, and received the Southern Historical Association's most coveted award, the John Hope Franklin Lifetime Achievement Award.

My most recent book, co-authored with civil rights attorney Armand Derfner, *Justice Deferred: Race and the Supreme Court* (2021), was deemed "authoritative and highly readable" by Harvard University Law professor Randall Kennedy in his review in *The Nation*. *Justice*

Deferred was featured as a session at the November 2021 annual meetings of the Social Science History Association in Philadelphia, for a session at the April 2022 Midwestern Political Science Association meeting in Chicago and as a plenary session at the October 2022 Association for the Study of African American Life and History Association in Montgomery. Sessions on *Justice Deferred* are also scheduled for the annual meetings of the American Historical Association in January 2022 in Philadelphia and at the Organization of American History Association in March 2022 in Los Angeles. My book *The Age of Lincoln*, published in 2007, won the *Chicago Tribune* Heartland Literary Award for Nonfiction and was selected for Book of the Month Club, History Book Club, and Military Book Club. One reviewer proclaimed, “If the Civil War era was America's ‘Iliad,’ then historian Orville Vernon Burton is our latest Homer.” The book was featured at sessions of the annual meetings of the Association for the Study of African American Life and History, the Social Science History Association, and the Southern Intellectual History Circle. Among the articles I have published are several related to the issues discussed in this report and at least two law review articles address these issues directly. I was one of ten historians selected to contribute to the *Presidential Inaugural Portfolio* (January 21, 2013) by the Joint Congressional Committee on Inaugural Ceremonies. I edit two academic press series for the University of Virginia Press: *The American South Series* and the *A Nation Divided: Studies in the Civil War Era Series*.

As a scholar, I have had a long-time relationship with Georgia. I was born in Royston, and own the family farm in Madison County, Georgia. I am a recognized authority on the Georgia educator and theologian Dr. Benjamin E. Mays, who taught at Morehouse College from 1921 to 1923, was the longtime president of Morehouse College (1940-67), campaigned and was elected to the Atlanta schoolboard in 1969. The Atlanta school board members elected him president in 1970 and he served as president until he retired in 1981. My book, *In My Father House Are Many Mansions: Family and Community in Edgefield, South Carolina* (1985) is an intense study of a large section of South Carolina that is only separated from Georgia by the Savannah River, and the area has strong ties to Georgia and especially to the city of Augusta, which I have studied since before my Ph.D.

I have researched in the archives of the University of Georgia, Emory University, and Morehouse College. I have served on the Ph.D. committees, and am serving on one currently, at the University of Georgia. I gave one of Georgia’s annual humanities lectures in conjunction with

the Governor's Awards for the Humanities. I also keynoted one of the annual meetings of the Georgia Historical Society. I served on the Advisory Committee for the Atlanta History Museum to develop new exhibits on the modern South. I have been invited to present papers and talks and participate in seminars at Universities and colleges in the state of Georgia. I was invited and spoke at the Carter Center, and spoke at the University of Georgia, Augusta University, Payne College, Mercer University, gave the Crown lecture at Morehouse College, Georgia State University, Georgia Southern University, Fort Valley State University, Berry College, Emory University, the Georgia Institute of Technology, Young Harris College. I also led a workshop on teaching history for Georgia public school teachers in Athens, Georgia. Most recently, on October 12, 2022, I was invited back to Morehouse College for an academic conference. I was part of a panel discussing a special issue of *The Journal of Modern Slavery: A Multidisciplinary Exploration* 7:4 (2022) which was also issued as a book, *Slavery and its Consequences: Racism, Inequity & Exclusion in the USA*. On October 20, 2022, I returned to Georgia Southern University and spoke on "The Past, Present, and Future of Voting Rights" (with former Savannah Mayor Dr. Otis Johnson) as part of the Legacy of Slavery to Lecture series.

B. Prior Testimony

Over the past forty years, I have been retained to serve as an expert witness and consultant in numerous voting rights cases by the Voting Section of the Civil Rights Division of the United States Department of Justice (DOJ), the Voting Rights Project of the Southern Regional Office of the American Civil Liberties Union, the Brennan Center, the NAACP, the Legal Defense Fund (LDF) of the NAACP, the Mexican American Legal Defense and Educational Fund, the California Rural Legal Association, the League of United Latin American Citizens, the Lawyers' Committee for Civil Rights Under Law, the Legal Services Corporation, the Southern Poverty Law Center, and other individuals and groups.

I have extensive experience in analyzing social and economic status, discrimination, and historical intent in voting rights cases, as well as group voting behavior. I have been qualified as an expert in the fields of districting, reapportionment, and racial voting patterns and behavior in elections in the United States. My testimony has been accepted by federal courts on both statistical analysis of racially polarized voting and socioeconomic analysis of the population, as well as on the history of discrimination and the discriminatory intent of laws. For example, in 2021, my testimony and my report were cited in the Final Judgment and Order in Community Success

Initiative. v. Moore, 19 CVS 15941 (Superior Court, Wake County, March 28, 2022). In 2014, my testimony and my report was cited by the U.S. District Court for the Southern District of Texas in finding that the Texas in-person Voter ID Law was racially motivated and had a disparate effect on minorities. *See Veasey v. Perry*, 71 F.Supp.3d 627 (S.D. Tex. 2014). My testimony and reports have been cited by the U.S. Department of Justice. In 2012, for example, my report was cited by the Justice Department as a reason for their objection to the in-person South Carolina Voter ID law. *See* Dkt. 118-1, *South Carolina v. United States*, No. 1:12-cv-00203-CKK-BMK-JDB (D.D.C. June 29, 2012).

To the best of my knowledge and memory, in the last five or so years I have given testimony and/or depositions in the following cases: (i) *Pendergrass v. Raffensperger*, 1:21-cv-05339 (N.D. Ga.), (ii) *Grant v. Raffensperger*, 1:22-cv-00122 (N.D. Ga.), (iii) *League of Women Voters v. Lee*, No. 4:21-cv-186 (N.D. Fla.), (iv) *Community Success Initiative v. Moore*, No. 19-cv-15941 (N.C. Superior Court) (2020); (v) *Perez v. Perry* (5:11-CV-00360, W.D. Tex.); (vi) *South Carolina v. United States* (1:12-cv-00203, D.D.C.); and (vii) *Veasey v. Perry* (2:13-CV-193, S.D. Tex.). In addition, I testified on the VRA in a Congressional Briefing on December 4, 2015.

C. Methodology and Sources

In this report, I have employed the standard methodology used by historians and other social scientists in investigating the adoption, operations, and maintenance of election laws. When analyzing political decision-making, historians examine the circumstantial and contextual evidence regarding the political, institutional, and social environment and context in which a decision is made, as well as direct evidence of the reasons asserted for the decision. We examine relevant scholarly studies, newspaper coverage of events, reports of local, state or federal governments, relevant court decisions, and the record in court cases, including expert reports, depositions and trial testimony, and statistical data. In writing this report, I have examined a wide range of sources. I have relied on primary and secondary sources available to me at the time of writing this report. This report makes extensive use of primary sources, especially contemporary newspapers, which record debates and speeches, and help to provide a barometer of public sentiment. Where possible, I have consulted historical and current newspaper and news magazines accounts, social media, miscellaneous online resources, from multiple perspectives, and checked for accuracy. I have also read the records of both houses of the Georgia General Assembly, the

journals and debates of the constitutional conventions, bill histories, and public statutes. I have studied census data, election returns, state and federal reports, official elections records. I have also used videos that have been recorded and preserved. I have also consulted secondary published works, as well as MA and Ph.D. theses, on politics and race relations in Georgia by other historians and social scientists, specifically, as well as in the South as a whole. This report features extensive footnotes to allow readers to assess the accuracy and credibility of my evidence and my conclusions.

IV. GEORGIA'S HISTORY OF RACE DISCRIMINATION IN VOTING

A. Introduction

Native Georgia historian, Dr. U. B. Phillips, argued in 1928 that the central theme of southern history was white racism. According to Phillips, white Southerners believed so strongly in white supremacy that they were determined the South “shall be and remain a white man’s country.”⁴ Recently, Georgian and today’s most eminent historian of the American South, Spalding Distinguished Professor of History, emeritus at the University of Georgia, Dr. James C. Cobb, characterized Phillips’s argument as a “longstanding determination of whites to control people of color.” In Cobb’s own 2017 historical investigation of Georgia’s racial history he concluded, “the historical and contemporary pervasiveness of this impulse [of white Georgians determination to control people of color] is difficult to deny.”⁵ My own research has found the same underlying purpose. This report demonstrates that this white determination resonates even today and especially in the area of voting rights. Over generations, people of color in Georgia have been discriminated against, disfranchised, and their vote diluted in ingenious ways by those who control the franchise in state and local governments.

The courts have taken judicial notice of this long and continuing history of racial discrimination, particularly in the area of voting rights. In 1994, in *Brooks v. State Board of Elections*, 848 F. Supp. 1548, 1560 (S.D. Ga. 1994), the court found: “Georgia has a history chocked full of racial discrimination at all levels. This discrimination was ratified into state constitutions, enacted into state statutes, and promulgated in state policy. Racism and race

⁴ Ulrich B. Phillips, “The Central Theme of Southern History,” *American Historical Review*, Volume 34, Issue 1 (Oct. 1928), 31; Orville Vernon Burton, “The South as ‘Other,’ The Southerner as ‘Stranger,’” *The Journal of Southern History*, Volume 79, Issue 1 (February 2013): 7-50.

⁵ Declaration of Dr. James C. Cobb at 8, *NAACP v. Gwinnett County Board of Registrations and Elections*, Civil Action No. 1:16-cv-02852, (N.D. Ga. Aug. 9, 2017).

discrimination were apparent and conspicuous realities, the norm rather than the exception.” This discrimination continues to this day.

In *A Voting Rights Odyssey: Black Enfranchisement in Georgia* (2003), Laughlin McDonald, an expert on Georgia’s voting history, wrote:

“While Georgia was not an anomaly, no state was more systematic and thorough in its efforts to deny or limit voting and officeholding by African-Americans after the Civil War. It adopted virtually every one of the traditional ‘expedients’ to obstruct the exercise of the franchise by blacks, including literacy and understanding tests, the poll tax, felony disfranchisement laws, onerous residency requirements, cumbersome registration procedures, voter challenges and purges, the abolition of elective offices, the use of discriminatory redistricting and apportionment schemes, the expulsion of elected blacks from office, and the adoption of primary elections in which only whites were allowed to vote. And where these technically legal measure failed to work or were thought insufficient, the state was more than willing to resort to fraud and violence in order to smother black political participation and safeguard white supremacy.”⁶

As McDonald further explained, Georgia and other southern states “continued their opposition to equal voting rights into the twentieth century and after the passage of the Voting Rights Act in 1965.”⁷ Since McDonald published this assessment of Georgia’s history of voter discrimination and suppression in 2003, the state of Georgia has continued attempts to minimize the electoral influence of minority voters. Throughout the history of the state of Georgia, voting rights have followed a pattern where after periods of increased nonwhite voter registration and turnout, the state has passed legislation, and often used extralegal means, to disfranchise minority voters. Georgia continues attempts to minimize the electoral influence of minority voters, most recently in the redistricting plan passed by the Georgia General Assembly and signed by the Governor, and culminating in the disfranchisement mechanisms and implementation of SB 202. The first section of this report describes this extensive history from as far back as Reconstruction through the present day.

⁶ Laughlin McDonald, *A Voting Rights Odyssey: Black Enfranchisement in Georgia* (Cambridge: Cambridge University Press, 2003), 2–3. The early history of voter suppression and voter intimidation of Black voters from 1867 till the 1990s in Georgia is carefully documented by Laughlin McDonald, Michael B. Binford, and Ken Johnson in “Georgia,” chapter three of *Quiet Revolution in the South: The Impact of the Voting Rights Act, 1965-1990*, edited by Chandler Davidson and Bernard Grofman (Princeton, N.J.: Princeton University Press, 1994), 67-102.

⁷ McDonald, *A Voting Rights Odyssey*, 3.

B. Reconstruction Era (End of the Civil War to 1870s)

From Georgia's beginning, Black Georgians were precluded from participating in nearly all of Georgia's political and civil life. Near the start of the Civil War, in 1860, the United States census recorded 41,080 owners of 462,000 enslaved persons. Except for Virginia, Georgia had more enslaved persons and more owners of slaves than any state. But free Blacks were denied citizenship and voting rights in antebellum Georgia too; under the 1777 Georgia Constitution, voting was limited to "male white inhabitants, of the age of twenty-one years." Before the start of the Civil War, in March 1861, Alexander H. Stephens, a Georgian and vice-president of the Confederacy, explained that the new government had as its cornerstone, "the great truth than the negro is not equal to the white man."⁸

Immediately following the Civil War was a period of opportunity for the newly freed population. But in opposition to any such new freedom were targeted policies against Black Georgians.⁹ With the defeat of the Confederacy, turmoil and uncertainty roiled the countryside. In June 1865, the 9,000 U.S. Army soldiers provided some measure of order and, where they were stationed, some protection for the newly freed enslaved people. With President Andrew Johnson's appointment of a provisional governor, white adult males who took a loyalty oath to the United States voted for delegates to write a new state constitution. While the new 1865 Georgia Constitution abolished slavery (as it was required to), the 1865 Constitution continued to limit the franchise to "free white male citizens of this State." Georgia's 1865 Constitution also excluded Black Georgians from holding office.¹⁰

At the end of the Civil War, Confederate states seeking to rejoin the Union were required to ratify the 13th Amendment, which specifically outlawed slavery.¹¹ In December 1865, the

⁸ Keith S. Hebert, *Cornerstone of the Confederacy: Alexander Stephens and the Speech that Defined the Lost Cause* (2021); McDonald, *A Voting Rights Odyssey*, 16.

⁹ Jeffrey Robert Young, "Slavery in Antebellum Georgia," *New Georgia Encyclopedia*, www.georgiaencyclopedia.org/articles/history-archaeology/slavery-antebellum-georgia (Oct. 20, 2003) (last edited Sep. 30, 2020); William Harris Bragg, "Reconstruction in Georgia," *New Georgia Encyclopedia*, <https://www.georgiaencyclopedia.org/articles/history-archaeology/reconstruction-in-georgia/> (Oct. 21, 2005) (last edited Sep. 30, 2020)

¹⁰ Numan V. Bartley, *The Creation of Modern Georgia* (Athens: University of Georgia Press, 1983), 46-47; Bragg, "Reconstruction in Georgia."

¹¹ Orville Vernon Burton, *The Age of Lincoln* (New York: Hill and Wang, 2007), 269-70, 275, 298, 368; Orville Vernon Burton and Armand Derfner, *Justice Deferred: Race and the Supreme Court* (Harvard University Press, 2021), 37-38, 41, 44-45;

Georgia General Assembly ratified the 13th Amendment, and President Andrew Johnson returned governing the state to Georgia's elected officials. While the language of the prisoner exemption clause of the 13th Amendment was common to state constitutions and the Northwest Ordinance, historian Eric Foner notes that it "did not go unnoticed among white Southerners" that the 13th Amendment included a prisoner exemption clause.¹² In November 1865, for instance, former Confederate general John T. Morgan pointed out in a speech in Georgia that the 13th Amendment did not prevent states from enacting laws that enabled "'judicial authorities' to consign to bondage blacks convicted of crime."¹³

Georgia, like other states in the former Confederacy, then enacted "Black Codes," although the state did not refer to them with that name. This legislation regulated and restricted the rights of Black citizens through neutral-sounding regulations.¹⁴ Although Black Georgians could not be legally subjected to penalties or punishment that did not apply to whites, it was local white officials and all white juries who decided whom would be punished and whom would not. While Black Georgians were granted some property rights, they could not serve on juries, or vote, or, significantly, testify against whites in court. Thus white Georgia officials were able to apply supposedly race neutral laws in a way that targeted the former enslaved people. Around this time, the Georgia legislature elected two prominent former Confederate officials as Georgia's two U.S. Senators, Alexander Stephens and Herschel Johnson, which the North saw as a flagrant act of white Georgian defiance and led Congress to deny them a seat in Washington.

In reaction to the re-election of former Confederate leaders, to the Black Codes, and to increasing violence against newly freed Black people, Georgia and nine other former Confederate States were placed under Federal military authority in 1867. As part of that oversight, adult Black males were given the right to vote, and the following time period was one of tremendous opportunity for Black Georgians. After the passage of the Second and Third Reconstruction Acts by Congress in 1867, Black males voted for the first time, and federally appointed registrars added 98,507 Black men to the voting lists, and required Georgia, as a requirement for readmission as a

¹² Eric Foner, *The Second Founding: How the Civil War and Reconstruction Remade the Constitution* (New York: W. W. Norton, 2019), 47-48, 110.

¹³ Sidney Andrews, *The South Since the Civil War* (Boston: Houghton Mifflin, 1971), 323-24 (first published by Ticknor and Fields, 1866); John Richard Dennett, *The South as It Is, 1865- 1866*, (Tuscaloosa: University of Alabama Press, 2010), 110.

¹⁴ Bartley, 17; Bragg, "Reconstruction in Georgia."

state, to write Black suffrage into the state constitution, elect a government based on the new Constitution, and ratify the Fourteenth Amendment, which granted citizenship to the formerly enslaved and guaranteed equal protection, and provided that Congress and the federal government could enforce that protection even against the states.¹⁵ In December 1867, a new constitutional convention, held in Atlanta, guaranteed Black citizenship, protection of the laws, and the right of male suffrage. In the next election, in April 1868, held under the new constitution, twenty-five Black Georgians were elected to the State House, and three were elected to the State Senate.

Shortly afterward, white Georgians plotted to eliminate their power. Robert Toombs, a Democratic Party leader from Wilkes County, Georgia, exclaimed at a meeting of Georgia Democrats in July 1868 that it was an injustice that Georgia had been forced to accept “[Republican Governor Rufus] Bullock and nigger Government.”¹⁶ Toombs had served as secretary of state of the Confederacy and as a Confederate general, and he objected to Georgia’s Constitution of 1868, drafted during Reconstruction, because he believed it granted Black people too many rights of citizenship.¹⁷ That same year, *The Atlanta Constitution* also insisted that “the negro [was] incapable of self-government,” and that the “interest of the white race . . . should be held as paramount to all perilous experiments upon an alien race.”¹⁸

Even white Republicans sought to eliminate Black suffrage. Samuel Bard, the editor of the *Atlanta Daily New Era*, a Republican newspaper, reassured his readers that “Reconstruction does not make negro suffrage a permanency,” and promised that “as soon as the State is once more in its place . . . they can amend their Constitution, disfranchise the negroes, and restore suffrage to the disfranchised whites.”¹⁹ By that December, Democrats, though in the minority, convinced a

¹⁵ Bartley, 48.

¹⁶ “Mammoth Democratic Mass Meeting,” *The Atlanta Constitution* (Atlanta, GA), July 24, 1868 (available online at <https://www.Newspapers.com/image/26848994>).

¹⁷ McDonald, *A Voting Rights Odyssey* at 35-36.

¹⁸ *The Atlanta Constitution* (Atlanta, GA), July 30, 1868 (available online at <https://www.Newspapers.com/image/26849014/>).

¹⁹ “Reconstruction and the Southern Whites,” *The Atlanta Daily New Era* (Atlanta, GA), January 4, 1868. For a scholarly overview of these post-Civil War and post-Reconstruction disfranchising measures, see *Quiet Revolution in the South*, 67–70.

sufficient number of white Republicans to agree to expel all Black members of the Georgia legislature. By September 1868, all Black legislators were expelled from the General Assembly.²⁰

This expulsion, along with the continuing high levels of racial violence directed at African Americans, convinced Congress to suspend Georgia's status once again as a state. Black legislators were reseated after the passage of the Congressional Reorganization Act of 1869.²¹ In 1870 the Georgia Legislature returned the expelled Black legislators to their seats and expelled twenty-two members who had served as Confederate officers. That same year it passed the Akerman Law, prohibiting any person from challenging or hindering voters at the polls.²² White Georgians reacted with vengeance; between 1867 and 1872, "at least a quarter of the state's Black legislators were jailed, threatened, bribed, beaten or killed."²³ At the heart of Black voter suppression was both explicit and implicit white violence. As Sidney Andrews, a journalist from Massachusetts, wrote in 1865, "any man holding and openly advocating even moderately radical views on the negro question, stands an excellent chance, in many counties of Georgia and South Carolina, of being found dead some morning."²⁴

In October 1868, the *Atlanta Daily New Era* reported that those "despairing Democracy are resorting to the grossest acts of violence with the view of intimidating the negro away from the polls."²⁵ Historian Edmund Drago noted that starting in the April 1868 election through the 1872 presidential election, Democrats resorted to murder, violence, fraud, and intimidation, and successfully decreased Republican votes. Black politicians were threatened with violence, and some Black legislators were murdered by the Ku Klux Klan.²⁶

²⁰C. Mildred Thompson, *Reconstruction in Georgia: Economic, Social, Political, 1865-1872* (New York: Columbia University Press, 1915) 214; Edmund L. Drago, *Black Politicians and Reconstruction in Georgia: A Splendid Failure* (Baton Rouge: Louisiana State University Press, 1982), 148. There remains today a bronze sculpture on the Georgia Legislature's grounds entitled "Expelled Because of Color" to the 33 Black members of the Georgia Legislature who were expelled at that time.

²¹ Drago, 55.

²² McDonald, *A Voting Rights Odyssey*, 17–25.

²³ McDonald, *A Voting Rights Odyssey*, 35.

²⁴ Sidney Andrews, "The South Since the War," in Brooks D. Simpson, ed., *Reconstruction: Voices From America's First Great Struggle for Racial Equality* (New York: Library of America, 2018), 140

²⁵ *The Atlanta Daily New Era* (Atlanta, GA), October 25, 1868.

²⁶ Drago, 141-159.

One such instance of political violence happened in Camilla, Georgia in the fall of 1868. Just two months after the state assembly expelled its African American members, local officials from Mitchell County and the surrounding area organized a march from Albany to Camilla that would end at a local Republican rally. Several hundred Black Georgians joined the planned march along with several white Republicans, but upon entering town, local whites hiding out in storefronts along the town square gunned them down, murdering at least a dozen and wounding another thirty. The result of such a massacre was that white Democrats took control of southwest Georgia.²⁷

Klan violence against Black legislators was severe. On October 29, 1869, a Black state legislator named Abram Colby from Greene County, Georgia was attacked by a group of sixty-five Klansmen, who dragged him into the woods and beat him for more than three hours before leaving him for dead. The mob explained that they were attacking Colby because he “had influence with the negroes of other counties.”²⁸ Colby later recounted before the Congressional Joint Select Committee to Inquire into the Condition of Affairs in the Late Insurrectionary States that, as he was beaten with “sticks and with straps that had buckles on the ends of them,” his assailants had demanded that he promise to never “vote another damned Radical ticket.”²⁹ Colby testified that the same group of men had also attempted to bribe him to switch parties or resign from the legislature. Colby’s story, while horrific, was not unique—this kind of violence against Black Republicans was common between 1869 and 1872.³⁰ The Ku Klux was active throughout the

²⁷ See Lee W. Formwalt, “Camilla Massacre,” New Georgia Encyclopedia, <https://www.georgiaencyclopedia.org/articles/history-archaeology/camilla-massacre/> (Sep. 5, 2002) (last edited Aug 20, 2020) See also Lee Formwalt, “The Camilla Massacre of 1868: Racial Violence as Political Propaganda,” *The Georgia Historical Quarterly*, Vol. 71, No. 3 (Fall, 1987), 399-426.

²⁸ *Ibid.*

²⁹ United States Congress, Joint Select Committee on the Condition of Affairs in the Late Insurrectionary States, Luke P. Poland, John Scott, and Woodrow Wilson Collection, *Report of the Joint select committee appointed to inquire into the condition of affairs in the late insurrectionary states, so far as regards the execution of laws, and the safety of the lives and property of the citizens of the United States and Testimony taken* (Washington: U.S. Government Printing Office, 1872). Available online from the Library of Congress, <https://lcn.loc.gov/35031867>.

³⁰ *Ibid.*; see also Kidada E. Williams, “The Wounds that Cried Out: Reckoning with African Americans’ Testimonies of Trauma and Suffrage from Night Riding” in *The World the Civil War Made*, Gregory P. Downs and Kate Masur, eds. (Chapel Hill: University of North Carolina Press, 2015) 159-62, 170-72.

state. Charles Kendricks, a politically active African American carpenter, and landowner in Gwinnett County, was appointed as an election manager by the state's Republican governor; he reported that a Klan leader had burst into his home waving a pistol and threatening to hang him. When he wrestled with the intruder and managed to run away, he was shot. The same perpetrator had previously pistol whipped Kendricks and attempted to stab him when he had seen Kendricks approaching the polls to vote.³¹

The example of Georgian Tunis Campbell is illustrative of Georgia's disfranchisement and intimidation tactics. Born in 1812, Tunis Campbell was a prominent African American abolitionist, who arrived in Georgia as an agent of the Freedman's Bureau. In the spring of 1865, he traveled to the Georgia coast and established a freedmen's settlement. When president Andrew Johnson began pardoning ex-Confederates and returning their land, Campbell purchased a large tract of land on St. Catherine's Island, allocated new settlements, and organized what became a self-governing community.³² From there, Campbell moved into politics, becoming the head of the Republican Party in Georgia, a local registrar of voters, a delegate to Georgia's new Constitutional Convention, and eventually a state senator. He consulted with U.S. President Ulysses S. Grant and Senator Charles Sumner in 1871 on the need for voting rights for African Americans. He even headed up his own militia to protect him and his community from attacks from local bands of the Ku Klux Klan.³³ Local whites attempted to undermine Campbell from the start. In 1867, while serving as a state registrar, he survived a poisoning attempt, which reportedly killed one of his colleagues. Two years later, when both Tunis and his son won seats in the Georgia General Assembly, white state officials voted to deny them their seats.

³¹ Testimony Taken by the Joint Select Committee to Inquire into the Condition of Affairs in the Late Insurrectionary States: Georgia, Volume I (Washington, D.C.: Government Printing Office, 1872), 350-55, 515-517. Available online at: https://ia601409.us.archive.org/32/items/reportofjointsel06unit/reportofjointsel06unit_bw.pdf.

³² Russell Duncan, "Tunis Campbell, 1812-1891," New Georgia Encyclopedia, <https://www.georgiaencyclopedia.org/articles/arts-culture/tunis-campbell-1812-1891/> (Dec. 10, 2004) (last modified Jul 15, 2020). See also Russell Duncan, *Freedom's Shore: Tunis Campbell and the Georgia Freedmen* (Athens: University of Georgia Press, 1986).

³³ *Ibid*; See also Richard Hogan, "Resisting Redemption: The Republican Vote in Georgia in 1876," *Social Science History*, Vol. 35, No. 2 (Summer 2011), 13-166. See also, Jess McHugh, "He fought for Black voting rights in Georgia. He was almost killed for it." *The Washington Post* (Oct. 25, 2020) available at: <https://www.washingtonpost.com/history/2020/10/25/voting-rights-tunis-campbell-civil-war/>

During this time of immense violence, intimidation, and chicanery, in 1871 white Democrats took control of the Georgia Legislature. With a majority of elected officials dedicated to white supremacy, the state of Georgia tightened its grip on would-be Black voters and especially on Black elected officials, reinstituting an annual poll tax to dissuade or outright prohibit impoverished Black Georgians from voting. The poll tax and continued violence was effective: In 1872 only four Black citizens were elected to the Georgia Legislature, and only three in 1874.

In 1871, the state of Georgia also voted to remove the Republican Governor, thus basically ending political Reconstruction in Georgia. Then Democrats re-organized county elections and took control of local elections, thereby diminishing both the electoral power of Black voters-- and negating Tunis Campbell's authority as the leading politician in McIntosh County. In 1874, for example, Campbell won a seat in Georgia's House of Representatives, but Georgia's Democratically controlled legislature threw out all of the votes from Darien, Georgia (Campbell's base of support) after learning that a local election judge was not a registered property holder.³⁴

Finally, in 1876, after years of trying to thwart Campbell's political career, white Democrats arrested Campbell on trumped up charges alleging malfeasance in office. A Georgia court sentenced him to a yearlong term in prison, which he served while working as a convict-lease laborer at a state labor camp. He left Georgia upon his release and published a memoir entitled *The Sufferings of the Rev. T. G. Campbell and his Family in Georgia (1877)*.³⁵

The story of Tunis Campbell illustrates the effectiveness of violence, intimidation, fraud, and the poll tax. After white Democrats seized control of the Georgia state legislature, they organized a new constitutional convention, chaired by the same Robert Toombs cited above, who had been the secretary of state of the Confederacy. The Georgia state constitution of 1877 implemented a cumulative poll tax for elections, so that potential voters had to pay all previous unpaid poll taxes before casting a ballot.³⁶ The new 1877 Georgia constitution did not disfranchise its African American citizens in explicit words. But as historian Edmund Drago noted, however,

³⁴ See Hogan, 147.

³⁵ See Duncan, "Tunis Campbell." See also Tunis G. Campbell, *Sufferings of the Rev. T.G. Campbell and his family, in Georgia* (Washington, D.C.: Enterprise Publishing Company, 1877). Available online at: <https://archive.org/details/sufferingsofrevt00camprich/page/9/mode/2up>

³⁶ For a brief explanation of how the cumulative poll tax worked to disfranchise African Americans, see Avidit Acharya et al., *Deep Roots: How Slavery still Shapes Southern Politics* 146 (2018).

new restrictions, combined with reinstated poll taxes, were “sufficient to render black participation in politics improbable.”³⁷

C. The Populist & Early Progressive Movement Era (1880s to 1910s)

Populism emerged in the late 1880s as a challenge to the Post-Reconstruction settlement in Georgia. Populism meant different things to different people in different places, but it usually meant an emphasis on “the people” rather than on “the elite.” In Georgia “the people” meant the white people and the maintenance of white supremacy and the avoidance of any challenges to one-party rule. Almost all Georgia white elites were committed to the maintenance of white supremacy. A leading political figure in Georgia in these years was not a Populist but the Progressive Movement leader Henry Grady, who proclaimed the first of many “New Souths.” Grady wrote in 1885 that racial inequality is “instinctive—deeper than prejudice or pride—and bred in the bone and blood” and therefore it was essential that “the white race must dominate forever in the South.”³⁸

Populism and the Farmer’s Alliance became a major factor in Georgia politics in the late 1880s. Most Georgia Populists were not racial egalitarians, but they did denounce race hatred and lynching, and promoted enlightened and mutual self-interest as an economic strategy. The Populists also called for financial reforms and regulation of corporations, particularly the railroads. The *Atlanta Constitution* warned that maintaining white supremacy was more important than “all the financial reform in the world.”³⁹ In Georgia progressivism was, in the words of historian John Dittmer, “conservative, elitist, and above all, racist.”⁴⁰

The populist career of Tom Watson, a Congressman and U.S. Senator from Georgia, demonstrated the difficulties of challenging white supremacy in the state. Watson was initially a supporter of the interracial alliance of the populist movement, advocating for the rights of African Americans to vote and even standing guard all night to protect an African American’s right to vote. But after 1900, in his Georgia congressional campaign, Watson refashioned himself as virulently

³⁷ McDonald, 35–37; Drago, 156.

³⁸ Bartley, 85–86.

³⁹ McDonald, *A Voting Rights Odyssey*, 37.

⁴⁰ John Dittmer, *Black Georgia in the Progressive Era, 1900–1920* (Urbana: University of Illinois, 1977), 214.

racist (and anti-Semitic), a vehement defender of lynching, running on a platform of white supremacy.⁴¹

Georgia then took additional steps to exclude Black voters from the franchise at the end of the 19th century. In 1890, the Georgia legislature passed a law ceding primary elections to party officials. The law kept political candidates from trying to appeal to Black voters or to build multiracial coalitions.⁴² In 1898, the Georgia Democratic Party adopted the use of a statewide primary, a popular progressive reform to remove politics from “smoke-filled back rooms.” But the adoption in Georgia was not a reform to bring in more democracy. In 1900, following the lead of South Carolina, Georgia became the second state to bar Black voters from participating in the Democratic Party, under the pretense that the Democratic Party was a private “club” and only had to accept the patronage of its chosen “guests.” Because Georgia was a one-party Democratic state, this meant that Black Georgians had no effective role in the state’s politics. The white primary was one of the central ways Georgia evaded the Fifteenth Amendment.⁴³

Georgia’s government took another a giant step towards evading the Fifteenth Amendment in 1908, when it passed the “Progressive era” Felder-Williams bill, which became known as the “Disenfranchising Act.” Because the Fifteenth Amendment barred outright elimination of Black voting, other methods were used to curb and discourage Black voting without explicitly banning it. Even so, many agreed with the Georgia Congressman Tom Watson, who said in 1910 that “the hour has struck for the south to say that the fifteenth amendment is not law and will no longer be respected.”⁴⁴

The 1908 Felder-Williams bill broadly disfranchised many Georgians but included a series of exceptions that would continue to allow most white voters to vote, such as: (1) having served

⁴¹ Julia Mary Walsh, “‘Horny -Handed Sons of Toil’: Workers, Politics, and Religion in Augusta, Georgia, 1880—1910,” (Urbana: University of Illinois, 1999). Available online at: <https://www.ideals.illinois.edu/handle/2142/84756>; Donald A. Grant, *The Way it Was in the South: The Black Experience in Georgia* (1993; University of Georgia Press, 2001), 175-78; C. Vann Woodward, *Tom Watson: Agrarian Rebel* (1938; Oxford University Press, 1963); Barton Shaw, “Populist Party.” New Georgia Encyclopedia, <https://www.georgiaencyclopedia.org/articles/history-archaeology/populist-party/> (Sep. 3, 2002) (last modified Sep. 29, 2020)

⁴² Bartley, 149; GA History, “White Primary Ends,” available online at: <http://gahistorysms.weebly.com/white-primary-ends.html>

⁴³ McDonald, *A Voting Rights Odyssey*, 38.

⁴⁴ *Ibid*, 39–40

in either the U.S. or Confederate armies, (2) having descended from someone who had served in either the U.S. or Confederate armies, (3) owning forty acres of land or five hundred dollars' worth of property in Georgia, (4) being able to write or to understand and explain any paragraph of the U.S. or Georgia Constitution, or (5) being "persons of good character who understand the duties and obligations of citizenship."⁴⁵ Overall, the Felder-Williams bill's literacy test, plus a property requirement and a cumulative poll tax, eliminated almost all existing Black voters in Georgia (along with a fair number of poor whites.)

While the bill became known as the "Disenfranchising Act," Georgia officials like Governor Hoke Smith justified the bill in the name of "honest elections in Georgia," which could begin by "keeping registration lists above suspicion."⁴⁶ Thus, pursuant to this new law, a new registration of voters was held after its adoption by popular vote.⁴⁷ The technique of disfranchisement under the name of something else, such as honest elections, became more prevalent in Georgia and elsewhere. As the *Atlanta Journal* wrote about the Felder-Williams bill, in passing it "Georgia takes her place among the enlightened and progressive states which have announced that the white man is to rule. She has declared in clear and specific terms for Anglo-Saxon supremacy and the integrity of the ballot."⁴⁸

In the campaign to disfranchise Black voters, Georgia officials blamed a specter of voter fraud, echoing rhetoric from the violent overthrow of Reconstruction that Black residents did not deserve the rights of citizenship and the sanctity of the ballot. For Southern Progressives, as Governor Hoke Smith argued, "the first step toward purifying the ballot" was "the exclusion of the ignorant and purchasable negro."⁴⁹ White Democrats blamed "fraudulent negro voters" for Republican rule during Reconstruction, and falsely claimed that denying African Americans the right to vote would eliminate fraud.⁵⁰ John M. Brown, the editor of *The Bainbridge Democrat*, argued that "the negro as a voter—by a very large majority—is purchasable," and without

⁴⁵ *Ibid*, 41.

⁴⁶ Georgia. General Assembly. House of Representatives. *Journal of the House of Representatives of the State of Georgia* (Atlanta, GA: Franklin-Turner Company, 1908), 11. Available online through the University of Georgia at: http://dlg.galileo.usg.edu/do:dlg_ggpd_y-ga-bl404-b1908.

⁴⁷ *Journal of the House of Representatives of the State of Georgia*, 19.

⁴⁸ McDonald, *A Voting Rights Odyssey*, 42.

⁴⁹ "Hoke Smith Writes of Campaign Issues," *The Atlanta Georgian and News* (Atlanta, GA), July 29, 1910.

⁵⁰ *The Atlanta Constitution* (Atlanta GA), June 16, 1898.

disfranchisement a “minority of the whites” could control Black voters and take Georgia hostage.⁵¹ The false claim that Black votes were fraudulent began during Reconstruction and continues as a trope today.⁵²

This pretext of voter fraud and purifying elections was used to justify the wholesale change in voter registration laws. In conjunction with the Felder-Williams bill that stripped Black men of their voter registrations, the Georgia General Assembly also approved a measure to amend the process for registering voters. The *Cartersville News* explained that this “pure election law” provided that “the registration list shall be placed on exhibit in the office of the clerk of the court, where all may inspect and may challenge those who are thought not worthy of a place.”⁵³ The bill stipulated that “the list from the voters’ books . . . shall be open to public inspection, and any citizen of the county shall be allowed to contest the right of registration of any person whose name appears upon the voters’ list.”⁵⁴ This “challenge” provision was incorporated into the 1910 Code of the State of Georgia, and remains substantively unchanged to this day.⁵⁵

The purpose of both the disfranchisement law and the registration law was clear: to disfranchise Black Georgians and keep it that way. Governor Smith explained that during his tenure that “we adopted a registration law” that “was intended to make complete and fully effective the disfranchisement law.”⁵⁶ The *Atlanta Semi-Weekly Journal* wrote that “the registration provision of the pure election law which guarantees the ballot to every real white citizen of the

⁵¹ “For Negro Disfranchisement,” *The Bainbridge Democrat* (Bainbridge, GA), September 3, 1908.

⁵² *The Atlanta Constitution* (Atlanta GA), June 16, 1898.

⁵³ “Laws to Govern Georgia Elections,” *The Cartersville News* (Cartersville, GA), August 20, 1908.

⁵⁴ Part I, Title VII, *Acts and Resolutions of the General Assembly of the State of Georgia, 1908* (Atlanta, GA: Charles P. Byrd, 1908), 60. Available online through the Digital Library of Georgia at: https://dlg.usg.edu/record/dlg_zlgl_102041291

⁵⁵ Originally codified as § 34-605, the 1908 voter challenge provision was preserved in substantially the same form through extensive reorganization and modernization of the Georgia Election code in 1964 and 1981, when it was re-codified at § 21-2-230. As observed in the editor’s note for the 2008 edition of *The Official Code of Georgia, Annotated* § 21-2-230, the voter challenge provision of the reorganized 1981 *Official Code of Georgia* was so similar to the 1933 *Code*’s voter challenge statute that any legal opinions decided under the older code would apply to § 21-2-230. See O.C.G.A. § 21-2-230 (2008). On intimidation and the use of the Georgia Challenge law, see *Vigilante: Georgia’s Vote Suppression Hitman* (Show&Tell Films 2022).

⁵⁶ “Hoke Smith Writes of Campaign Issues,” *The Atlanta Georgian and News* (Atlanta, GA), July 29, 1910

state” ensures that “his ballot’s power shall not be vitiated by a corrupt and floating element,” i.e. the Black voter whose vote was “fraudulent.”⁵⁷

Together, these laws were devastatingly effective at eliminating both Black elected officials from seats of power and Black voters from the franchise. At this time of the Felder-Williams bill, the last remaining African American in the legislature was William H. Rogers, and he resigned after the passage of the bill. There would not be another Black Georgian in the legislature for half a century. In terms of voters, in 1908, 33,816 Black Georgians were registered to vote. Two years later, only 7,847 African Americans were registered, a decrease of more than 75 percent. In comparison, fewer than six percent of white voters were disfranchised by Georgia’s new election laws.⁵⁸ From 1920 to 1930 the combined Black vote total never exceeded 2,700.⁵⁹ In 1940 the total Black registration in Georgia was an estimated 20,000, around two or three percent of eligible Black voters. If anything, this figure exaggerates Black voting strength, since until 1944 Black voters were barred from the only election that mattered, the Democratic Party primary.⁶⁰

D. Early 20th Century (1910s to 1940s)

During the early 20th century, beyond the poll tax and the white primary which had functionally removed nearly all Black Georgians from voter registration lists, Black Georgians also faced an array of state-sponsored discrimination across all aspects of life which led back to voting.⁶¹ One was education. In *Cumming v. Richmond County School Board*, 175 U.S. 528 (1899), the U.S. Supreme Court sanctioned Georgia’s de jure segregation of white from Black students. The case arose after the school board in Augusta, Georgia, closed the only Black public high school in the county, while still operating its white high school. The Georgia Supreme Court approved of the closure and segregation, and so did the U.S. Supreme Court. And without support for schools

⁵⁷ “A Puerile Attack on a Great Law,” *The Atlanta Semi-Weekly Journal* (Atlanta, GA), June 24, 1910.

⁵⁸ *Ibid.*; see also *Quiet Revolution in the South*, 67.

⁵⁹ McDonald, *A Voting Rights Odyssey*, 46.

⁶⁰ *Ibid.*, 49; see also J. Morgan Kousser, *Colorblind Injustice: Minority Voting Rights and the Undoing of the Second Reconstruction* (Chapel Hill: University of North Carolina, 1999), 201.

⁶¹ The continuing effects of discrimination in Georgia hinder the ability of minority group members to participate effectively in the political process. Disparities in education, income, and health outcomes persist in Georgia, effectively disadvantaging many minority voters. Although another expert is providing census data and other statistics on racial disparities in socio-economic characteristics usually cited in connection with Senate Factor 5, I am providing a historical background here.

for Black Georgians, not only could literacy tests be used to keep Black people from voting, but under-resourced education and segregated schools severely stalled economic and social mobility for Georgia's Black residents.⁶²

Like many southern states in the early years of the twentieth century, Georgia, on both a state and local level, instituted a vast array of Jim Crow legislation concerning restaurants, parks, zoos, chain gangs, and even prohibiting whites and African Americans from swearing on the same Bible in Atlanta courtrooms.⁶³ Georgia was also dead last among states in the percentage of Black farmers who owned their own land, at only 12.8%.⁶⁴ Of course, under the Felder-Williams Disenfranchisement Act, ownership of land was one of the exceptions of access to the franchise.

In 1916, Georgia elected Hugh M. Dorsey as governor. By no means a racial liberal, Dorsey did oppose the worst of Jim Crow. In his pamphlet entitled, *A Statement from Governor Hugh M. Dorsey as to the Negro in Georgia*, published before he left office in 1921, he highlighted the condition of Black Georgians at the time. He wrote, "in some counties the Negro is being driven out as though he were a wild beast. In others he is held a slave." Governor Dorsey also wrote, in response to white mob violence against Black Georgians, that Georgia "stand[s] indicted before the world. If the conditions. . . should continue, both God and man would justly condemn Georgia more severely than man and God have condemned Belgium and Leopold for the Congo atrocities."⁶⁵ Governor Dorsey wrote the truth; violence and threat of violence was constant for many Black Georgians after white Democrats controlled the state in the late 19th and first part of the 20th century.

At the time, a common form of state-sanctioned violence was debt peonage and the convict lease system, which some have described as slavery by another name. In theory, the federal Debt

⁶² Edward A. Hatfield, "Segregation," New Georgia Encyclopedia, <http://www.georgiaencyclopedia.org/articles/history-archaeology/segregation> (Jun 1, 2007) (last edited Jul 20, 2020); Grant, 220. The Booker T. Washington High School in Atlanta opened in 1924; there were several denominational high schools for African Americans in Georgia.

⁶³ Bartley, 148.

⁶⁴ Adrienne Petty and Mark Schulz, "American Landowners and the Pursuit of the American Dream," in *Lincoln's Unfinished Work: The New Birth of Freedom from Generation to Generation*, Orville Vernon Burton and Peter Eisenstadt eds. (Baton Rouge: Louisiana State University, 2022), 133–171.

⁶⁵ "A statement from Governor Hugh M. Dorsey as to The Negro in Georgia," (<https://archive.org/details/statementfromgov00georrich>) (also available through the Library of Congress at <https://lcn.loc.gov/21027163>; cited in Cobb, 22-23.

Peonage Act of 1867 had outlawed the peonage system—the system of debt slavery—throughout the United States. But even up through the 1920s, the federal government investigated and prosecuted hundreds of employers across the South, including particularly in Georgia, for practicing peonage. But the federal government’s prosecutions rarely succeeded in punishing offending landowners. In the end, peonage was ended by outside social and economic forces. In 1915, the boll weevil was found on Georgia cotton plants and thereafter the insect devastated cotton agriculture. In addition to the boll weevil, the Great Depression and the mechanization of agriculture spelled the end of the cotton plantations of Georgia. Only the decline of the cotton plantations ended the practice of peonage.⁶⁶

Throughout World War I, Black Georgians also faced state-sanctioned racial discrimination. While the Selective Service Act of 1917 required all able-bodied men of a certain age to register for a national draft, regardless of race, it was local draft boards that were responsible for processing men registering for the draft and selecting which registrants would be inducted into military service.⁶⁷ In Fulton County, for example, the draft board “granted exemptions to 526 of the first 815 white registrants examined but turned down only six out of 202 black men.”⁶⁸ Statistically, across Fulton County, 65 percent of the whites but only three percent of the Black Georgians were granted exemptions from military service. Fulton County’s racially discriminatory decisions were so flagrant that President Woodrow Wilson, who had lived in Augusta, Georgia as a boy, and who is today remembered as the president who segregated the federal government and

⁶⁶ Miller Handley Karnes, “Law, Labor, and Land in the Postbellum Cotton South: The Peonage Cases in Oglethorpe County, Georgia, 1865-1940,” (Urbana: University of Illinois, 2000), available online at: <https://www.ideals.illinois.edu/handle/2142/84756>; Cobb, 19-22; Pete Daniel, *The Shadow of Slavery: Peonage in the South, 1901-1969* (New York: Oxford University Press, 1972), 110-131; Talitha L. Laflouria, *Chained in Silence: Black Women and Convict Labor in the New South* (Chapel Hill: UNC Press, 2016); Sarah Haley, *No Mercy Here: Gender, Punishment, and the Making of Jim Crow Modernity* (Chapel Hill: UNC Press, 2016).

⁶⁷ U.S. Congress, “An Act To authorize the President to increase temporarily the Military Establishment of the United States,” United States Statutes at Large, Vol. 40 (1917-1919), 65th Congress (available online through the Law Library of Congress at <https://www.loc.gov/law/help/statutes-at-large/65th-congress/session-1/c65sch.pdf?locir=blogloc-ww1>).

⁶⁸ Arthur E Barbeau and Florette Henri, *The Unknown Soldiers: Black American Troops in World War I* (Philadelphia: Temple University Press, 1974), 35.

endorsed the racist movie, “Birth of a Nation,” was forced to remove officials of the Fulton County Georgia Draft Board.

As Black Georgians were drafted into the war at a higher proportion than were whites, the NAACP established a chapter in Georgia in 1917, which was the same year that Georgia adopted the county unit form of government. The county-unit system became the method for determining the winner of the Democratic primary, the only elections in the state that mattered.⁶⁹

Under the county-unit system, every county was given twice the number of unit votes as they had representatives in the state house. Each of Georgia’s 159 counties had at least one seat in the legislature, no county had more than three. The winner in each county’s primary election received all that county’s unit votes. This system gave a greater share of proportion of votes to small, rural, and much whiter counties, compared to larger and more urban counties, where the majority of still active Black voters lived.⁷⁰ As in many states prior to the *Baker v. Carr* (1962) decision, Georgia’s election system had a strongly rural bias, but perhaps in no state was the rural tilt as pronounced as in Georgia, diluting the strength of Black voters across Georgia.

Against this backdrop, in 1919, the Atlanta chapter of the NAACP was wildly successful in its voter registration drive: in one month, they registered more than one thousand new Black voters, more than doubling the number of Black voters who participated in past elections. The success of the NAACP caused panic among leading whites, and the following year, the Georgia General Assembly proposed legislation to prohibit Blacks from voting or from holding office.⁷¹

As Black Georgians returned from the war, many white Georgians held a deep antipathy regarding Black WWI veterans, which led in part to the rise of the Ku Klux Klan in Georgia following the war. Historian Nancy MacLean wrote about this time, in which seeing Black men in military uniforms, “a symbol commanding respect,” led white Georgians to racial violence as backlash.

⁶⁹ Between 1872 and 1950, the Democratic candidate won every state-wide race. See McDonald, *A Voting Rights Odyssey* at 81.

⁷⁰ Scott E. Buchanan, “County Unit System,” New Georgia Encyclopedia, <http://www.georgiaencyclopedia.org/articles/counties-cities-neighborhoods/county-unit-system> (Apr 15, 2005) (last edited Aug 21, 2020).

⁷¹ Nancy MacLean, *Behind the Mask of Chivalry: The Making of the Second Ku Klux Klan* (Athens: University of Georgia, 1994), 28.

After World War I, in Georgia and elsewhere, African Americans again continued to try to vote despite the *legal* means of disfranchisement which state officials (white Democrats) had enacted, and whites again resorted to violence and intimidation to keep African Americans from the polls. For example, in Harris County, Georgia, African Americans planned to vote because President Franklin Roosevelt had a vacation home nearby, giving Black voters there a sense of federal protection. Trying to eliminate that sense of protection, however, white Georgians in the area “dug some graves there by the courthouse... and burned some crosses at the crossroads.”⁷²

Of course, lynchings throughout the state served as a reminder for Black Georgians who challenged the status quo, and in practice lynchings did not need to be directly connected to the right to vote to act as a threat against all Black Georgians who dared participate in the franchise. From 1875 to 1930, there were 462 lynchings in Georgia. Only the state of Mississippi had more reported lynchings. Graphic descriptions of the lynchings sent messages to Black Georgians to stay in line (and to whites that racial violence would go unprosecuted).⁷³

E. World War II Era (1940s to 1950s)

Up until the 1940s, Black Georgians had been successfully excluded from the franchise by many means, including the white primary. In 1944, however, in *Smith v. Allwright* the United States Supreme Court issued a landmark decision holding that political parties could not exclude Black Americans from participating in the party’s primary elections, thereby prohibiting the widely utilized white primary system.⁷⁴

One year later, in 1945, the United States District Court for the Middle District of Georgia ruled in *King v. Chapman* that the Muscogee County Democratic Executive Committee and the state of Georgia had violated the Fourteenth, Fifteenth, and Seventeenth Amendment rights of Primus E. King, a Black voter who had been turned away when he had attempted to vote in the Democratic Party’s primary in Columbus, Georgia that prior summer. The judge, in part relying

⁷²Testimony of William Simpson, Trial Transcript at 115, 118, *Brown v. Reames*, Civ. No. 75-80-COL (M. D. Ga.)

⁷³ W. Fitzhugh Brundage, *Lynching in the New South: Georgia and Virginia, 1880-1930* (Urbana-Champaign: University of Illinois Press, 1993); McDonald, 47; Georgia Lynching Project, circa 1875-1930,” (<https://scholarblogs.emory.edu/galynchings/counties/>).

⁷⁴ *Smith v. Allwright*, 321 U.S. 649 (1944).

on *Smith v. Allwright*, found that despite Georgia's attempts to make party primaries "purely private affairs," primary elections were "by a law an integral part of the election machinery."⁷⁵

These cases, along with Governor Ellis Arnall's decision not to attempt to "circumvent the [*Allwright*] decision," and organizing efforts by groups like the NAACP-backed All Citizens Registration Committee, led to a massive surge in voter registration in 1946, especially among Black voters.⁷⁶ By the time of the 1946 primary, 118,387 Black Georgians had registered to vote. According to the *Jackson Progress-Argus* of Jackson, Georgia, this was "by all odds the largest registration in Georgia's primary."⁷⁷

This important progression in Black voter registration, however, was met by outright hostility from candidates in the 1946 Gubernatorial election. For example, the race-baiting Democratic gubernatorial candidate in that election, Eugene Talmadge, campaigned on a platform of white supremacy and disfranchisement, threatening that if the "Democratic White Primary is not restored and preserved," Black voters, "directed by influences outside of Georgia," would control the Democratic Party.⁷⁸ This language echoed earlier comments from Georgia Governor Hoke-Smith which questioned the legitimacy of Black voters.⁷⁹ As Talmadge menacingly warned, "wise Negroes will stay away from white folks ballot boxes." Similarly, Marvin Griffin, a candidate for Lieutenant Governor, made white supremacy a cornerstone of his campaign and announced that he believed "the White Democratic Party should be kept white in Georgia, and that

⁷⁵ *King v. Chapman*, 62 F. Supp. 639 (M.D. Ga. 1945); *Chapman v. King*, 154 F.2d 460 (5th Cir. 1946); *Chapman v. King*, 327 U.S. 800 (1946); "Judge Rules Negroes May Vote," *The Atlanta Constitution* (Atlanta, GA), October 13, 1945; "Georgia Reform Faces Test in Hot Primary," *The Sunday News* (Lancaster, PA), July 14, 1946; Ronald H. Bayor, *Race and the Shaping of Twentieth-Century Atlanta* (Chapel Hill, NC: University of North Carolina Press, 1996), 34.

⁷⁶ McDonald, *A Voting Rights Odyssey*, 49.

⁷⁷ "Total Registration in Georgia May Reach Million When Deadline Falls," *The Jackson Progress-Argus* (Jackson, GA), June 20, 1946; "118, 387 Qualified to Vote in Georgia Primary Election," *The Plaindealer* (Kansas City, KS), July 19, 1946.

⁷⁸ "Georgia CAN Restore the Democratic White Primary and Retain County Unit System," *The Forsyth County News* (Cummings, GA), July 4, 1946.

⁷⁹ "Our Last Chance for WHITE SUPREMACY," *The Jackson Herald* (Jefferson, GA), July 11, 1946; "Georgia's State Campaign To Be Red Hot Affair," *The Gaffney Ledger* (Gaffney, SC), April 25, 1946.

carpet baggers and scalawags should not be permitted to take over this state and destroy southern racial traditions.”⁸⁰

As the 1946 gubernatorial race progressed, both Griffin’s and Talmadge’s campaigns relied on voter challenges to disfranchise Black voters and repudiate the recent court rulings.⁸¹ In particular, Talmadge responded to *Smith v. Allwright* by mounting challenges to Black voter registration forms, claiming they were filled out incorrectly. Although the state law required specific reasons for voiding registrations, Talmadge’s crew cited spurious reasons. They created pre-filled forms with spaces to fill in the voter’s name and county, with reasons such as “the voter was not a resident, was not eighteen, was not a person of good character, could not read the English language,” and so forth.⁸² These forms demonstrated that Talmadge’s campaign did not know the specific circumstances or qualifications of the voters they challenged; all they knew were that these voters “were black, and that was enough.”⁸³ Ultimately, the Talmadge machine challenged so many voters that when those voters arrived in person to prove their qualifications, “it proved impossible to process all of them on election day, and as a result the Black voters were allowed to cast their ballots.”⁸⁴ All in all, during this election, more than thirty counties challenged Black registrations, denying an estimated 15,000 to 25,000 Black registrants the right to vote.⁸⁵

The state of Georgia also continued to attempt to circumvent the rule against white primaries. In 1947, the Georgia General Assembly introduced a bill that would allow the continuation of a white-only primary by divorcing primaries from state action entirely. Willis Smith, a representative from Carroll County, said “Georgia is in trouble with the Negroes unless this bill is passed.” Echoing historian U. B. Phillips’ Central theme of Southern history, Smith continued “This is white man’s country, and we must keep it that way.”⁸⁶

⁸⁰ *The Houston Home Journal* (Perry, GA), May 30, 1946; Kathy Lohr, “FBI Re-Examines 1946 Lynching Case,” July 25, 2006 (available online at: <http://www.npr.org/templates/story/story.php?storyId=5579862>); Cobb Declaration, 26.

⁸¹ “Talmadge ‘Purge’ of Negro Voters Bogging Down in Georgia Counties,” *The Atlanta Constitution* (Atlanta, GA), July 12, 1946.

⁸² McDonald, *A Voting Rights Odyssey*, 52-53.

⁸³ *Ibid.*, 52–54.

⁸⁴ *Ibid.*, 53.

⁸⁵ *Ibid.*, 52–54.

⁸⁶ *Ibid.*, 55. The bill was vetoed by Gov. Thompson who questioned its legality and believed it would invite fraud.

But perhaps the most successful way Georgia continued to circumvent the rule against white primaries was the continuation of the county-unit system, which had both the purpose and the effect of containing the Black vote in the urban areas of the state. By the early 1940s, 43.5% of the state's population (and 39.9% of the state's white population) controlled 59% of the unit votes. The unit vote system was inherently non-majoritarian, and situations in which candidates won the popular vote but lost the unit vote were not uncommon. And it had the consequence that not only legislative districts, but state-wide races for governor and other executive branch positions had a rural and white bias. The main target of the county-unit system was Atlanta and Fulton County, where many Black Georgians lived. In 1946, each unit vote in Fulton County represented 14,092 popular votes, while each unit vote in Chattahooche County (a much whiter county) represented 132 popular votes. In other words, each voter in Chattahooche County had 120 times the weight of a Fulton County voter.

The county-unit system was a bulwark for the racist and die-hard white supremacist machine of long-time governor Eugene Talmadge. Talmadge claimed the enemies of the county unit system were a group of "liberals, white primary antagonists, and integrationists." While five constitutional challenges were brought against the county-unit system in the 1940s and 1950s, none succeeded.⁸⁷

Following Governor Talmadge's death, voter challenges to Black voters were used again during the 1948 Georgia gubernatorial special election. In Laurens County, Georgia, nearly three-quarters of the 2,477 of the Black Georgians who were registered to vote were purged after they were unable to appear before the board of registrars, which a grand jury later found illegal.⁸⁸ Marion County also engaged in a similar, and unsuccessful purge that targeted Black voters, who were challenged because of their supposed "lack of education."⁸⁹ While the efforts to purge Black voters in Laurens and Marion Counties failed, other counties pushed forward. The day before the Democratic primary election, 558 Black voters were purged from Spalding County's registration

⁸⁷ Ibid., 83.

⁸⁸ "Tax Collector of Laurens County Puts Negroes Back on List," *The Butler Herald* (Butler, GA), June 17, 1948; "'Vote Purge' Evidence Said Insufficient," *The Atlanta Constitution* (Atlanta, GA), August 29, 1948; "Twiggs Board Directed to Enroll Negroes," *The Atlanta Constitution* (Atlanta, GA), August 14, 1948.

⁸⁹ "Marion County Striking 400 From Voting List," *The Butler Herald* (Butler, GA), August 26, 1948; "Attempts to Intimidate Voters Told," *The Alabama Tribune* (Montgomery, AL), September 17, 1948;

list. Attempts to challenge and purge Black voters from voter registration lists also occurred in Lowndes, Schley, and Twiggs counties, and may have also taken place in Dougherty County as well.

When attempts to challenge African American voters' qualifications failed, other methods of voter intimidation were employed. For example, Augusta employed "slowdown" tactics in the 1948 elections that mirrored what Savannah did in 1946, whereby "several thousand blacks were unable to vote before the polls closed because of the delaying tactics of poll officials and were simply turned away."⁹⁰ Election officials only allowed three Black voters to vote per hour, in the hopes that there would "be plenty of Negroes standing in line when the polls close."⁹¹ Furthermore, in 1949 the state government (unsuccessfully) attempted to force a general re-registration, "with the obvious aim of ridding the rolls of Negro voters."⁹²

Along with strategic election-related tactics, there was also an upsurge of Klan activity and violence directed at Black voters.⁹³ In the days before the 1948 Democratic primary election, the Ku Klux Klan successfully suppressed Black voting in Lowndes County by burning crosses and threatening African American voters.⁹⁴ Acting Governor M.E. Thompson alleged that "during 1948 intimidation of voters by the Ku Klux Klan is being employed as a substitute for the purge campaign of 1946."⁹⁵ Threats of the Ku Klux Klan, extralegal violence, and all white juries within the legal system made these tactics effective. For example, a Black minister and teacher in Bleckley County went to the courthouse to register to vote in the 1955 election, but the chief of

⁹⁰ "'Vote Purge' Evidence Said Insufficient," *The Atlanta Constitution* (Atlanta, GA), August 29, 1948; "Twiggs Board Directed to Enroll Negroes," *The Atlanta Constitution* (Atlanta, GA), August 14, 1948. "Attempts to Intimidate Voters Told," *The Alabama Tribune* (Montgomery, AL), September 17, 1948; "Pre-Vote Klan Threats Substitute for Poll Purge of '46 – Thompson," *The Atlanta Constitution* (Atlanta, GA), March 25, 1948.

⁹¹ "Attempts to Intimidate Voters Told," *The Alabama Tribune* (Montgomery, AL), September 17, 1948; "Pre-Vote Klan Threats Substitute for Poll Purge of '46 – Thompson," *The Atlanta Constitution* (Atlanta, GA), March 25, 1948.

⁹² William M. Bates, "Require High School For Voters, Cook Asks," *The Atlanta Constitution* (Atlanta, GA), November 20, 1957.

⁹³ McDonald, *A Voting Rights Odyssey*, 52–54.

⁹⁴ Patrick Novotny, *This Georgia Rising: Education, Civil Rights, and the Politics of Change in Georgia in the 1940s* (Macon: Mercer University Press, 2008), 270; "Attempts to Intimidate Voters Told"; "Pre-Vote Klan Threats Substitute for Poll Purge of '46 – Thompson."

⁹⁵ *Id.*

police told him “[n]o niggers register in this courthouse.” The next year, someone burned a cross in his yard. He did not attempt to register again until 1964.⁹⁶

After the passage of the 1957 Civil Rights Act, Georgia Governor Marvin Griffin—the candidate whose campaign had filed thousands of challenges against Black voters in 1946—formed a state election law revision committee, which introduced new voter requirements that were “aimed primarily . . . at curbing potential Negro voting strength in Georgia.”⁹⁷ Voters could be disqualified for offenses like “moonshine liquor law violations, adultery and child abandonment,” and the law would also impose a new, more stringent voter qualification test.⁹⁸ Rather than forcing a re-registration to ensure that all 1.2 million registered voters in the state could meet the new requirements, the new requirements “could be invoked against a registered voter upon challenge by another voter.”⁹⁹ Griffin’s insistence that the legislation include a \$1.00 poll tax (which had been previously eliminated in Georgia in 1945) and bi-annual re-registration ultimately led to the bill’s demise in the General Assembly.¹⁰⁰ From poll tax to registration schemes, the purpose in tweaking voting requirements was difficult to miss; the intent was to keep the numbers of eligible Black voters as low as possible, and to keep the requirements for voting accessible to the more marginal white voters.

F. Pre-Voting Rights Act (Early 1960s)

By the end of the 1950s and the start of the 1960s, Georgia’s malapportioned districts, which had the obvious effect of favoring rural white voters over urban Black voters, continued to grow. In 1960, even though the eight counties with the largest population had 41 percent of the

⁹⁶ Even with the VRA, Bleckley County did not see significant increase in Black registration because of the legacy of terror associated with attempting to register at the courthouse. In 1984, Bleckley County allowed satellite registration, and Black registration did increase. See McDonald, *A Voting Rights Odyssey*, 56.

⁹⁷ William M. Bates, “Crime Barriers and Stiffer Tests Proposed to Curb Negro Voting,” *The Atlanta Constitution* (Atlanta, GA), November 22, 1957; “Griffins Poll Tax, Voter Registration Bids Face Scuttling Move in House,” *The Atlanta Constitution* (Atlanta, GA), February 13, 1958.

⁹⁸ Bates, “Crime Barriers and Stiffer Tests Proposed to Curb Negro Voting”; Bates, “Griffins Poll Tax, Voter Registration Bids Face Scuttling Move in House.”

⁹⁹ Bates, “Crime Barriers and Stiffer Tests Proposed to Curb Negro Voting.”

¹⁰⁰ Bates, “Griffins Poll Tax, Voter Registration Bids Face Scuttling Move in House.”

state's population, they had only 12 percent of the members in the Georgia House of Representatives.¹⁰¹

Georgia's congressional districts were also grossly malapportioned around this time. In 1957, Georgia's Fifth District, consisting of Fulton, DeKalb, and Rockdale Counties, was the second most populous congressional district in the United States, with an estimated population of 782,800—about twice the size of the average congressional district. At the same time, Georgia's Ninth District, a much whiter district in the northeast part of the state, had an estimated population of 238,790, less than a third of the population of the fifth District. By 1960, Fulton County was the most underrepresented county in its state legislature of any county in the United States. DeKalb County was in third place.¹⁰² Over time, the explosive growth of Atlanta, and the consequent increase in Black voters, put increased pressure on the county-unit system. Although still badly disproportionate in comparison to registration for whites, growing Black voting strength in Georgia was increasingly able to make a difference in close elections, something the state's segregationists were acutely aware of.

Defending the county-unit system became an issue on which die-hard segregationists would take their stand. For Peter Zack Greer, elected lieutenant-governor of Georgia in 1962, “left-wing radicals and Pinks,” were intent on unleashing the “bloc Negro vote in Atlanta.”¹⁰³ Even more moderate segregationists expressed similar sentiments. Carl Sanders, elected Georgia's governor in 1962, stated that eliminating the county-unit system would leave state government in the hands of “pressure groups or bloc votes”—the leading white Georgia euphemism for Black voters—and would keep “liberals and radicals from taking over.”¹⁰⁴

Attempting to prevent the overturning of the county-unit system, in 1962 the Georgia General Assembly made some modifications to increase the representation of Fulton County in the state senate from three to seven. At the same time, however, they allowed the creation of multi-member, at-large districts so that the Black voters in a given county would always be outvoted,

¹⁰¹ McDonald, *A Voting Rights Odyssey*, 80–84; Key, 117–124; Kousser, *Southern Politics in State and Nation*, 203–204.

¹⁰² “What About Justice For the Fifth District?,” *Atlanta Constitution*, 23 October 1952; Bruce Galphin, “Only State Legislature Can Effectuate Reapportionment,” 28 November 1957; “We Challenge Congressman Jim Davis to Follow Seventh District's Example,” *Atlanta Constitution*, 30 March, 1962

¹⁰³ McDonald, *A Voting Rights Odyssey*, 82.

¹⁰⁴ *Ibid.*, 82–83.

and Fulton County’s state senators would be elected on an at-large basis. After this system was ruled unlawful, there were two majority-minority districts in Fulton County, one of which elected Leroy Johnson, the first African American to serve in a southern state legislature in many decades.¹⁰⁵

Beginning in 1963, the United States Supreme Court fully outlawed Georgia’s county-unit system in *Gray v. Sanders*, 372 U.S. 368 (1963), culminating in *Wesberry v. Sanders*, 374 U.S. 802 (1963), another case arising from Georgia in which the United States Supreme Court mandated equal apportionment for the upper houses of state legislatures and for congressional districts. As one Georgia scholar wrote, “[these cases were] not a racial discrimination case[s], but its concept that voting districts must be composed of substantially equal populations was to prove one of the keys that opened the door to minority officeholding in Georgia.”¹⁰⁶

In an attempt to subvert the Court’s decisions and to curb Black voting strength and electoral victories, in 1963, the all-white Election Laws Study Committee (ELSC) of the Georgia General Assembly proposed new voting rules for the state of Georgia. The goal of the Committee was to “replace[] the invalid county unit law” with rules that could operate to the same effect.¹⁰⁷ These rules included, most notably, a majority-vote rule to elect any candidate to local, state, and federal office in both primary and general elections, thus requiring a runoff if any candidate received only a plurality of the vote. The bill’s sponsor, Representative Denmark Groover (a self-described “segregationist”), explained such a requirement would reduce the influence of the “Negro bloc vote.”¹⁰⁸ And indeed, in practice, a majority-vote rule ensures that a Black candidate cannot be elected where Black voters are a minority of the population and voting is racially polarized, even when the white vote is split. *See, e.g., City of Port Arthur v. United States*, 459 U.S. 159, 167 (1982) (requiring removal of a majority vote rule for preclearance under Section 5, recognizing that “[i]n the context of racial bloc voting prevalent in [a city in which African Americans constituted a minority of the population], the [majority-vote] rule would permanently foreclose a black candidate from being elected”). Groover’s majority-vote law was ultimately

¹⁰⁵ *Ibid.*, 86-89.

¹⁰⁶ *Ibid.*, 80, 89-90.

¹⁰⁷ McDonald, *A Voting Rights Odyssey*, 91.

¹⁰⁸ Kousser, *Colorblind Injustice*, 198; McDonald, *A Voting Rights Odyssey*, 92.

enacted by the Georgia General Assembly in 1964, and to this day Georgia requires a majority vote for office.¹⁰⁹

In addition to this majority vote requirement, in 1964 the Georgia legislature passed a new voting law with a literacy requirement, a strengthened voter understanding test, a prohibition on voter assistance except in cases of physical disability, a numbered-post provision (a specific method of at-large voting), and an anti-facsimile ballot provision, prohibiting voters from taking sample ballots or lists of candidates into the voting booth, to prevent, or as one of the leaders in the Senate said, “bloc voting” by Black Georgians.¹¹⁰

That same year Georgia’s election laws underwent a substantial revision as the General Assembly passed “a simplified and comprehensive code of election laws” in response to criticism that the state’s election law was disorganized and disjointed.¹¹¹ The reorganization of Georgia’s election laws introduced some important changes, such as the creation of the State Election Board and the standardization of calendars for county and state primaries. But Georgia maintained many other discriminatory laws in the 1964 revisions. For example, the state kept its voter challenge provision. The new election law code stipulated that “any elector of the county shall be allowed to challenge the right of registration of any person whose name appears on the electors list,” and outlined the process for contesting another citizen’s right to vote.¹¹² This voter challenge statute would end up surviving the modernization, recodification, and reorganization of the Georgia Code of Laws in 1981 and a subsequent update to provide for Georgia’s participation in the national “motor voter” program in 1994.¹¹³ In fact, as the editor’s note for the 2008 edition of *The Official Code of Georgia, Annotated* § 21-2-230 observed, the voter challenge provision of the reorganized

¹⁰⁹ See Ga. Code Ann. § 21-2-501.

¹¹⁰ McDonald, *A Voting Rights Odyssey*, 91–103; Kousser, *Colorblind Injustice*, 105, 232–236.

¹¹¹ As Assistant Attorney General Paul Rodgers, a member of the Election Laws Study Committee, argued, “it’s the biggest mess you’ve ever seen.” “New Election Code an Attempt to Simplify ‘Hodgepodge’ Laws,” *The Atlanta Constitution* (Atlanta, GA), May 4, 1964. Lieutenant Governor Peter Zack Geer complained that the state’s election laws were “strewn helter-skelter through the Code of Georgia,” and expressed his belief that the new code would be “surrounded with and imbedded in due process of law and judicial standards.” “Lieutenant Governor Geer Favors New Election Law Code,” *The Forsyth County News* (Cumming, GA), May 27, 1964.

¹¹² *Journal of the Senate of the State of Georgia at the Extraordinary Session*, 1964 (Hapeville, GA: Longino and Porter, Inc., 1964), 83.

¹¹³ “Revising Outdated State Laws a Painstaking Job,” *The Atlanta Constitution* (Atlanta, GA), July 12, 1981; “Legislators Give Update of ’94 General Assembly Session,” *Forsyth County News* (Cumming, GA), April 6, 1994;

1981 *Official Code of Georgia* is so similar to the 1933 *Code*'s voter challenge statute that any legal opinions decided under the older code would also apply to § 21-2-230.¹¹⁴

G. Voting Rights Act Era (1960s and 1970s)

On the eve of the enactment of the Voting Rights Act (VRA) in 1965, most Black Georgians' voting power had been made ineffective by voting rules which were neutral in their language, but functionally discriminatory in effect. By the time of the VRA, while Black Georgians were 34 percent of the voting age population, there were only three elected Black officials, and those officials had been elected in just the previous three years before the enactment of the Voting Rights Act. Overall, less than a third of the eligible Black population was registered in the state, and in Georgia's twenty-three counties with a Black voting age majority, only 16 percent of African Americans were registered compared to 89 percent of whites.¹¹⁵ "This exclusion from the normal political process was not fortuitous; it was the result of two centuries of deliberate and systematic discrimination by the state against its minority population."¹¹⁶

The Voting Rights Act of 1965 would ultimately change the trajectory of voting rights for Black Georgians. In the award-winning book, *Quiet Revolution in the South: The Impact of the Voting Rights Act, 1965–1990*, Laughlin McDonald, Michael B. Binford, and Ken Johnson documented carefully the impact and opening of the franchise to African Americans in Georgia from 1965 through 1990.¹¹⁷ Beyond statistical improvements in Black registration and elected officials, the VRA affected the tone of the political system itself. In 1974, Andrew Young, a civil rights activist with SCLC who would later be elected mayor of Atlanta in 1982, addressed the Association of Southern Black Mayors: "It used to be that Southern politics was just 'nigger' politics: who could 'outnigger' the other. Then you registered 10 to 15 percent in the community and folk would start saying 'Nigra.'" After registration numbers went to 35 to 40 percent, "it's amazing how quick they learned how to say 'Nee-grow.'" And when registration increased to 70

¹¹⁴ O.C.G.A. § 21-2-230 (2008)

¹¹⁵ U.S. Commission on Civil Rights, *Political Participation: A Study of the Participation by Negroes in the Electoral and Political Processes in Ten Southern States since the Passage of the Voting Rights Act of 1965* (Washington, D.C.: U.S. Government Printing Office, 1968), 216-17, 232-39.

¹¹⁶ McDonald, et. al., "Georgia," in *Quiet Revolution in the South*, 67-102, 409-413, quotation on p. 67.

¹¹⁷ *Id.*

percent of the Black votes registered in the South, “everybody’s proud to be associated with their black brothers and sisters.”¹¹⁸

But the 1965 VRA did not translate to instant success in Black voter registration numbers. Even eleven years after the VRA, Black voters in Georgia were systematically underrepresented as a percentage of registered voters even after the passage of the VRA.¹¹⁹ As the table below demonstrates, Black registration trailed white registration significantly even in 1976, particularly in the state of Georgia.¹²⁰

State	% whites registered to vote, 1976	% Blacks registered to vote, 1976	% Difference
Alabama	75.4	58.1	17.3
Georgia	73.2	56.3	16.9
Louisiana	78.8	63.9	14.9
Mississippi	77.7	67.4	10.3
South Carolina	64.1	60.6	3.5
Texas	69.4	64.0	5.5
Virginia	67.0	60.7	6.3

The historical record also shows that most Georgia officials continued their hostility to Black voters and the VRA itself, especially the § 5 preclearance provisions to which they were now subject. As the VRA and other civil rights legislation gathered strength after the mid-1960s, white Georgia officials went to greater lengths to invent conditions and pretexts for challenging and neutralizing Black voting strength, both in the substance in their changes, and by refusing to seek preclearance at all.¹²¹

¹¹⁸ Jack Bass and Walter DeVries, *The Transformation of Southern Politics: Social Change and Political Consequence since 1945* (Basic Books, 1976), 47; David S. Broder, *Changing of the Guard: Power and Leadership in America* (Simon and Schuster, 1980), 367.

¹¹⁹ Campbell Gibson and Kay Jung, *Historical Census Statistics on Population Totals by Race* (Washington, DC: US Bureau of Census, 2002); McDonald, et al., “Georgia,” in *Quiet Revolution in the South*, 102.

¹²⁰ Laughlin McDonald, *Voting Rights in the South: Ten Years of Challenging Continuing Discrimination Against Minorities* (Atlanta: ACLU, Southern Regional Office, 1982).

¹²¹ For examples of white Georgians hostility to the Voting Rights Act and to African American attempts at voting, see especially the testimonies of Julian Bond and Laughlin McDonald in

One of the most common tactics of preventing Black voters from electing candidates of choice was the change from voting by district to at-large voting. The effect of at-large voting, particularly in a jurisdiction with less than a majority of Black voters, is to ensure the white population can elect all the representatives to that district. In 1964, before the VRA, Calhoun County (63% Black), Clay (61% Black), Dooly (50% Black), Early (45% Black), Morgan (45% Black), Newton (31% Black), and Miller (28% Black) had district elections for county government. But after the VRA, all adopted at-large voting, directly violating § 5 preclearance rules. Between 1976 and 1980, all of these counties were sued, and now have district voting for county elections.¹²²

In 1964, as previously discussed, in response to growing African American electoral strength, the Georgia General Assembly had adopted a law that required many offices to be won by a majority vote and not a mere plurality. At the time, the majority of Georgia's 159 counties had operated under a plurality system. The majority vote system was adopted to prevent a Black candidate being "first past the post" against a divided white vote.¹²³ Local jurisdictions also made the change to majority voting after the VRA. The city of Moultrie, Georgia, for example, adopted a majority voting procedure for city offices in 1965. All Black candidates were defeated until a § 5 suit forced the city to adopt districts in 1977. The city of Americus adopted a majority vote in 1968. Until a successful § 5 suit in 1977, two Black candidates who won by plurality in their Americus election races were defeated in the run-off election with a majority requirement. Around this time, Covington and St. Mary's, both cities with substantial Black populations, adopted a majority vote without seeking preclearance for doing so.¹²⁴ Overall, between 1975 and 1982, the U.S. Attorney-General brought 66 suits against majority voting requirements, many of them in Georgia. Many of these Georgia-specific instances can be found in Appendix A, located at the end of this report.

Extension of the Voting Rights Act: hearings before the Subcommittee on Civil and Constitutional Rights of the Committee on the Judiciary, House of Representatives, Ninety-seventh Congress, first session, May 6, 7, 13, 19, 20, 27, 28, June 3, 5, 10, 12, 16, 17, 18, 23, 24, 25, and July 13, 1981. (on Bond see pp. 224ff)(McDonald, 596 ff)

¹²² McDonald, *Voting Rights in the South*, 40–43

¹²³ McDonald, *A Voting Rights Odyssey*, 92–102; Kousser, *Colorblind Injustice*, 197–242.

¹²⁴ McDonald, *Voting Rights in the South*, 43–46

Numbered posts (another method of at-large voting) were another way to discriminate against Black voters and Black candidates. When, for instance, there were three open positions for county commissioner, rather than electing the three candidates with the highest vote totals, candidates had to run specifically for seats No. 1, No. 2, and No. 3, diminishing the chances of electing Black candidates. From 1975 to 1982, the Attorney-General objected to 60 submissions involving numbered posts, many from Georgia. Dawson, Kingsland, and St. Mary's all adopted numbered posts elections for the city council in the 1960s and 1970s, none of them applying for preclearance in doing so.¹²⁵

Staggered voting was another technique used to limit Black voting strength, by limiting the numbers of open seats at any one time and making it more difficult to Black candidates to get elected, particularly if combined with at-large voting schemes. Peach County, for example, staggered the election of its county commissioners starting in 1968, and the city of Kingsland did the same in 1976 without seeking preclearance.¹²⁶

Annexations of territory by cities to decrease the percentage of the Black population were, through 1982, the most common type of suit brought by the DOJ. The city of Jackson, for example, used annexation to limit Black voting strength until enjoined in 1981.¹²⁷

There were many other forms of Section 5 noncompliance in Georgia. In 1981, Julian Bond, a Georgia State Senator, testified before the House of Representatives that there were over four hundred non-submissions of Section 5 notifications by Georgia jurisdictions.¹²⁸ Many jurisdictions in Georgia simply refused to comply with Section 5 objections, such as Sumter County, Pike County, and Waynesboro. Other jurisdictions, such as Thomson, when faced with a Section 5 objection to majority voting, city officials encouraged the two white candidates to have an informal "run-off" to avoid splitting the white vote and allowing the Black candidate to win. This practice, known as "cuing," the endorsement by white community leaders of a specific

¹²⁵ Ibid. at 50–51.

¹²⁶ Ibid. at 51–52

¹²⁷ Ibid. at 52–53

¹²⁸ "Testimony of Julian Bond, State Senator from Georgia, Extension of the Voting Rights Act: Hearings Before the Subcommittee on Civil and Constitutional Rights of the Committee of the Judiciary," May–July 1981.

candidate prior to the actual election, is in the words of Laughlin McDonald, “doing by indirection that which Section 5 expressly forbids.”¹²⁹

Overall, the number of VRA Section 5 preclearance challenges raised by private or federal suit show that Georgia was one of the most active and ingenious in trying to prevent Black voting strength. From 1965 to 1981, the DOJ received a total of 34,798 voting changes submitted for preclearance under Section 5. DOJ ultimately objected to 815 of these proposed changes, and of those, 226, or almost 30 percent, were from the state of Georgia.¹³⁰ This figure far exceeds that of other states. Louisiana, for example, the state that was subject to the second-most number of objections, was only the subject of 136 objections, which is just a little over half of Georgia’s objections.¹³¹

This number likely significantly undercounts the number of actual and potential § 5 violations in Georgia prior to the 1982 reauthorization of the VRA. In a 1984 article, Drew Days and Lani Guinier estimated that “covered jurisdictions have made literally hundreds of changes that have never met the preclearance requirement of Section 5,” and that the DOJ “has not been able to ensure that every electoral change by covered jurisdictions, or indeed most of them, was subjected to the Section 5 process.”¹³² In another study, based on interviews with local attorneys in Georgia and Mississippi involved in voting issues found that 36.4% of attorneys that responded to the survey reported that local jurisdictions went ahead with election changes despite a pending preclearance request. The survey revealed other ways of gaming the VRA system—waiting until shortly before the election to file the Section 5 request, not giving the DOJ adequate time to respond, or alternatively, exhaustively arguing every nuance of a Section 5 request, hoping to win outright, or at least gain an advantage by exhaustion and attrition.¹³³ Even still, as noted, between 1965 and 1980, DOJ objected to more than 200 changes submitted by Georgia under Section 5.¹³⁴

In 1969, the United States Supreme Court in *Allen v. State Board of Elections*, 393 U.S. 544 (1968), made clear that changes made under preclearance under Section 5 of the VRA were to be construed broadly because to limit its scope to a specific set of voting restrictions would be

¹²⁹ McDonald, *Voting Rights in the South*, 60.

¹³⁰ *Ibid.*, 20-25.

¹³¹ *Id.*

¹³² Drew Days III and Lani Guinier, “Enforcement of Section 5 of the Voting Rights Act,” in Chandler, *Minority Vote Dilution*, 168.

¹³³ Ball et al., “The View from Georgia and Mississippi.”

¹³⁴ McDonald, *Voting Rights in the South*, 20–23.

“underestimating the ingenuity of those bent on keeping Negroes from voting.” The *Allen* Court also made clear that preclearance extended to reapportionment plans.¹³⁵

Georgia’s congressional reapportionment in 1971 was the first held under Section 5 preclearance rules, and it showed, in the words of Laughlin McDonald, “the extraordinary lengths to which the legislature was prepared to go to exclude Blacks from the congressional delegation.”¹³⁶ A plan proposed by two Black state senators to increase the Black percentage of Georgia’s Fifth congressional district from 34 to 45% was defeated 45 to 9. The plan which was approved by the Georgia General Assembly carved the Black population in the Fourth, Fifth, and Sixth Districts to give the Fifth district a substantial white majority, with the Fifth district as 38% Black, and specifically excluded from the district the homes of Andrew Young—who had unsuccessfully run for Congress in the district in 1970—and Maynard Jackson, another budding Black politician.

The Georgia General Assembly’s 1971 reapportionment plan was rejected by the Department of Justice under Section 5. Under a revised reapportionment plan, the Fifth District was 44.2% Black, in 1972, Georgian Andrew Young (along with Barbara Jordan in Texas), significantly both were elected from urban districts, became the first African Americans elected to the United States House of Representatives from the South in the twentieth century. Young was elected three times, resigning his seat in 1977 to become President Carter’s ambassador to the United Nations. It would take over a decade for another Black Georgian to be elected to the United States Congress from the state of Georgia.¹³⁷

H. End of the Twentieth Century (1980s–2002)

In the redistricting cycle after the 1980 census, the Georgia General Assembly again tried to limit Black voting strength in Atlanta. The Georgia General Assembly’s reapportionment plan contained white majorities in nine of the ten congressional districts, even though Georgia’s population at the time was nearly 30% Black. Julian Bond, by then a Georgia state senator, introduced a bill that would have made the Fifth congressional district 69% Black. In response, the Chair of the Senate Reapportionment Committee criticized the proposal as one that would

¹³⁵ Cited in Orville Vernon Burton and Armand Derfner, *Justice Deferred: Race and the Supreme Court* (Cambridge, MA: Harvard University, 2021), 228.

¹³⁶ McDonald, *A Voting Rights Odyssey*, 149.

¹³⁷ Bullock, “History of Redistricting,” 1065–66; McDonald, *A Voting Rights Odyssey*, 149–150.

cause “white flight.” The Chair of the House Reapportionment Committee similarly criticized the proposal on the grounds that he was disinclined to draw “nigger districts” or support “nigger legislation.”¹³⁸ Some members of the Georgia General Assembly stated they did not want to go back to their districts and “explain[] why I was a leader in getting a black elected to the United States Congress.” Bond’s proposal was predictably rejected, and the reapportionment plan drawn by the Georgia General Assembly was, as in the previous decade, rejected under Section 5 of the Voting Rights Act. The Court then approved a new plan with a district that was 65% Black. Julian Bond and John Lewis, two old friends and comrades from the Student Nonviolent Coordinating Committee (SNCC), vied for the seat; Lewis ultimately won.¹³⁹

In 1980, Laughlin McDonald noted that of the 18 Black Georgians elected to county governments—about only 3% of all office holders—16 of them were elected in majority Black districts or counties. As McDonald wrote in 1982, “blacks in Georgia’s majority white counties or districts, for all practical purposes, cannot get elected.”¹⁴⁰

On the eve of the possible expiration of the VRA in the early 1980s, Georgia continued to show that such an extension was necessary. In 1980, DeKalb County adopted a policy that it would no longer approve community groups to conduct voter registration drives.¹⁴¹ In 1981, Georgia was blocked from changing the rules about who could help voters at the polls under Section 5.¹⁴² The early 1980s also saw continued use of voter challenges against Black voters. In 1981, white Georgians on the northside of Atlanta formed the Voter Information Project (VIP), which used Georgia’s voter challenge law to dispute the right to vote of more than 50,000 registered voters in Fulton County, including 37,000 urban voters. Of these challenged voters, 58 percent were African

¹³⁸ McDonald, *A Voting Rights Odyssey*, 168-173.

¹³⁹ *Id.*

¹⁴⁰ McDonald, *Voting Rights in the South*, 40-43.

¹⁴¹ “Testimony of Julian Bond, State Senator from Georgia, Extension of the Voting Rights Act: Hearings Before the Subcommittee on Civil and Constitutional Rights of the Committee of the Judiciary,” May-July 1981, 54-55.

¹⁴² Sept. 18 Letter from William Bradford Reynolds to Michael Bowers at 2-3 (1981), quoted in Expert Witness Report of Dr. Peyton McCrary at 8, 18 (“McCrary Report”), *Fair Fight v. Raffensperger*, No. 1:18-cv-05391-SCJ (N.D. Ga. 2020), ECF No. 339. According to the 1970 census data (the latest available at the time of the DOJ objection), in Georgia, only 8 percent of whites over the age of 25 had completed less than five years of school while 32 percent of Blacks over the age of 25 had completed less than five years of school (also cited in McCrary).

Americans. As a result, in 1981, one in five registered voters was purged from Fulton County's voters' rolls.¹⁴³

That same year, the *New York Times* summarized the status of Black voters in Georgia as the country debated the 1982 re-authorization of the VRA:

“26.2 percent of the population is black, only 3.7 percent of the elected officials are black. The glitter of power in Atlanta, where two blacks are among the three frontrunners to succeed the city's two-term black mayor, Maynard Jackson. In fifteen of the state's twenty-two counties where blacks comprise a majority or close to it, no blacks serve on county commissions. It is not for want of trying; 34-year-old Edward Brown Jr. has twice run unsuccessfully for office in Mitchell Co. In Mr. Brown's instance, all-white poll officials and paper ballots greatly reduced his chances for winning. Testifying in a court case, Mr. Brown stated that it is difficult to win when whites as a matter of policy vote against blacks. Citing his defeats, he said that whites were transported to and from polling places by county sheriffs who urged them not to vote for Mr. Brown “because he's a nigger.”¹⁴⁴

When Congress did re-authorize the VRA in 1982, it cited systemic abuses by Georgia officials to evade Black voting rights.¹⁴⁵

At the end of the decade, Georgia again began another reapportionment cycle. Over the course of the 1990 redistricting cycle, the Department of Justice twice rejected the Georgia General Assembly's state's reapportionment plan, before finally approving the third submission.¹⁴⁶ After the 1992 election, a total of thirty-four African Americans were in the Georgia General Assembly, almost all of them from Black majority districts, almost all of whom owed their seats to litigation and to Section 5 of the Voting Rights Act.

I. Modern Era (2000s to Present Day)

Voter suppression tactics that have plagued Georgia's history have persisted into the modern era. These policies around voting have also come at a time of rapid demographic shifts in Georgia's electorate: Georgia is the only state in the Deep South where the percentage of the Black population has sharply increased over the past half century. Because of the remarkable growth of

¹⁴³ Barry King, “Notices Sent on Fulton Voter Purge,” *The Atlanta Constitution* (Atlanta, GA), March 3, 1981; Jim Walls, “One in Five Voters Dropped From Rolls,” *The Atlanta Constitution* (Atlanta, GA), April 16, 1981; Frederick Allen, “Voter Challenges Seen Through a Glass Darkly,” *The Atlanta Constitution* (Atlanta, GA), September 15, 1981.

¹⁴⁴ Stuart, “Once Again a Clash Over Voting Rights,” *N.Y. Times* (Sept. 27, 1981).

¹⁴⁵ S. Rep. No. 97-417, 97th Cong. 2d Sess. 10, 13 (1982).

¹⁴⁶ McDonald, *A Voting Rights Odyssey* 211–224.

metro Atlanta and its four core counties, Fulton, DeKalb, Gwinnett, and Cobb, these changing demographics in Georgia—especially its Black, Latino/a, and Asian populations, who tend to support Democratic candidates—combined with minority voter mobilization efforts are the “likeliest threat to Republican domination of Georgia elections.”¹⁴⁷

i. 2000s through 2010 Redistricting

For the fourth decade in a row, in the 2000 redistricting cycle the Georgia General Assembly passed redistricting plans that would not survive preclearance. Specifically, the district court in the District of Columbia refused to preclear the General Assembly’s Senate plan which decreased the Black voting age percentage in the districts surrounding Chatham, Albany, Dougherty, Calhoun, Macon, and Bibb Counties. Overall, the court found “the presence of racially polarized voting” and that “the State ha[d] failed to demonstrate by a preponderance of the evidence that the reapportionment plan for the State will not have a retrogressive effect.” *Georgia v. Ashcroft*, 195 F.Supp. 2d 25, 94 (D. D.C. 2002), *affirmed*, *King v. Georgia*, 537 U.S. 1100 (2003).

The 2002 election proved to be a watershed moment for the state of Georgia. For nearly half a decade, white voters in Georgia had been abandoning the Democratic Party for the Republican Party. When Republican Sonny Perdue defeated Democrat incumbent Roy Barnes as governor in 2002, the election “broke a Democratic stronghold on the Georgia governorship that had kept the GOP out since Reconstruction.”¹⁴⁸ In the 2004 election, Republicans also won the majority of House seats, shifting control of the legislature.

Georgia was the first state covered by Section 5 of the VRA to pass an in-person voter identification law. In 2005, the Georgia General Assembly promptly passed a photo ID law, limiting Georgians to only six acceptable forms of identification. Voters who lacked acceptable identification could purchase one from the state for \$20 to \$35. Sue Burmeister, the Georgia State Senator who had introduced the photo ID legislation, said in testimony before the Department of

¹⁴⁷ McCrary Report at 37; on the increasing influence of Latina/Latino peoples, see Victor Zuniga and Reuben Hernandez Leon, “The Dalton Story: Mexican Immigration and Social Transformation in the Carpet Capital of the World,” 34-50 and Mary E. Odem, “Latino Immigrants and the Politics of Space in Atlanta,” 112-125 in Mary E. Odem and Elaine Lacy, eds., *Latino Immigrants and the Transformation of the U.S. South* (University of Georgia Press, 2009).

¹⁴⁸ Danny Hayes and Seth C. McKee, “Booting Barnes: Explaining the Historic Upset in the 2002 Georgia Gubernatorial Election,” *Politics and Policy* 32 (December 2004), 1, quoted in McCrary Report at 29.

Justice that “if there are fewer black voters because of the bill, it will only be because there is less opportunity for fraud,” and that “when Black voters in her Black precincts are not paid to vote, they do not go to the polls.”¹⁴⁹ Shortly after the law’s enactment, the U.S. District Court for the Northern District of Georgia preliminary enjoined the law, finding the photo ID law was “most likely to prevent Georgia's elderly, poor, and African–American voters from voting.” *Common Cause/Georgia v. Billups*, 406 F. Supp. 2d 1326, 1365–66 (N.D. Ga. 2005). In reaction to the injunction, the Georgia General Assembly was forced to make the voter ID cards free.

Several years later, following the 2010 U.S. Census, white Republican Georgia lawmakers worked not only to maintain power but to create a super-majority through redistricting. The Georgia General Assembly’s reapportionment plan created a record number of majority-Black districts, which by packing Black votes together, solidified Republican holds in the surrounding districts. Ultimately, the Georgia Republican Party was successful in achieving a super-majority in the Senate; it fell one seat short of a super-majority in the House.¹⁵⁰

In 2015, the Georgia General Assembly engaged in mid-cycle redistricting after the Supreme Court invalidated Section 5’s preclearance formula in *Shelby County, Alabama v. Holder*, 570 U.S. 529 (2013).¹⁵¹ No longer subject to preclearance, the Georgia General Assembly reduced the Black and Latina/o voting age percentage in House districts 105 and 111, both of which had become increasingly diverse over the prior half-decade (and unlikely to elect Republicans).¹⁵² Plaintiffs initially brought suit over the changes under Section 2 of the Voting Rights Act, but the continued migration of voters of color into those districts rendered the General Assembly’s changes obsolete. After minority candidates prevailed in those districts in 2018, the plaintiffs withdrew their complaint.¹⁵³

¹⁴⁹ Carol Anderson, *One Person, No Vote: How Voter Suppression is Destroying Our Economy* (New York: Bloomsbury, 2018), 60–62; Ari Berman, *Give Us the Ballot: The Modern Struggle for Voting Rights in America* (New York: Picador, 2015) 222–224, 226–229; Stacey Abrams, *Our Time is Now: Power, Purpose, and the Fight for a Fair America* (New York: Henry Holt, 2020), 75–76

¹⁵⁰ Charles S. Bullock III, “The History of Redistricting in Georgia,” *Georgia Law Review* 52, no. 4 (2018): 1095–1098; Expert Report of Laughlin McDonald at 17, *Dwight et al. v. Kemp*, ECF No. 178 (Aug. 6, 2018).

¹⁵¹ Expert Report of Jowei Chen, *Georgia State Conference of NAACP v. State of Georgia*, No. 1:17-cv-1427, ECF No. 63 (N.D. Ga. Dec. 22, 2017).

¹⁵² *Id.*

¹⁵³ *Georgia State Conference of NAACP*, No. 1:17-cv-1427, ECF No. 221.

ii. State-Sponsored Voter Investigations

As in Georgia's past, modern-day elected officials, law enforcement officers, and political activists have continued to harass and intimidate Black voters and candidates in order to maintain political power. Nowhere is this more obvious than in Quitman, Georgia—a predominantly Black city in otherwise predominantly white Brooks County. In the early 2000s, Nancy Dennard, a Black educator, won a 2009 special election to the Brooks County School Board through a campaign that targeted citizens “who had never voted before” and who had problems getting to the polls on election day. At the time, Dennard's opponent complained about the large number of absentee ballots cast for Dennard. The Georgia secretary of state's office conducted a brief investigation but found no evidence of fraud.¹⁵⁴

The next year, two more Black women and allies of Dennard—Diane Thomas and Linda Troutman—ran for seats on the school board and again worked to increase voter turnout through absentee voting. This time, the Brooks County School Board hired a private investigator to track Dennard and her allies. More than 1,400 Black voters participated in the Democratic primary election for school board that year—three times the turnout in previous midterm elections—and Thomas and Troutman were elected as the Democratic Party's nominees. In response, then-Secretary of State Brian Kemp (in cooperation with the Georgia Bureau of Investigation) opened a formal investigation into the 2010 election in Quitman.¹⁵⁵

Six weeks after Thomas and Troutman won seats on the school board, state and local police arrested Dennard, Thomas, Troutman, and seven other people. Two more women were arrested a year later. The “Quitman 10+2,” as they came to be known, were collectively charged with 102 felony counts. Prosecutors alleged that organizers had provided unlawful assistance to voters and had unlawfully possessed ballots when they delivered sealed ballots to the post office. Despite a paucity of evidence, Kemp doggedly pursued a case against the Quitman 10+2, only backing down in 2016 when Georgia's attorney general issued an opinion clarifying that it was not a violation of the law for organizers to mail absentee ballots.

¹⁵⁴ John Ward, “How a Criminal Investigation in Georgia Set an Ominous Tone for African-American Voters,” Yahoo! News, August 6, 2019. <https://news.yahoo.com/how-a-criminal-investigation-in-georgia-set-a-dark-tone-for-african-american-voters-090000532.html> (accessed April 27, 2021).

¹⁵⁵ Ward, “How a Criminal Investigation in Georgia Set an Ominous Tone for African-American Voters.”

Afterward, Dennard argued the investigation and prosecution were an attempt to disqualify Black officeholders and stifle Black political activism. She insisted, “[T]hey thought they could make an example out of me, and that would kill the spirit of this movement.”¹⁵⁶ Thomas interpreted the Quitman 10+2’s arrest and investigation by explaining that “the message sent to our citizens was, if you don’t want the GBI to come visiting and put you in jail, you better not vote.”¹⁵⁷

In 2014, in comments to a group of Republican voters in Gwinnet County, then-Secretary of State Brian Kemp made clear the connection between minority voting rights and election victories when he remarked that “the Democrats are working hard . . . registering all these minority voters that are out there and . . . if they can do that, they can win these elections in November.”¹⁵⁸ Around the same time, Kemp’s office launched a criminal investigation into the New Georgia Project, an organization with the explicit goal of registering Georgia’s unregistered minority voters. The New Georgia Project was later cleared of any wrongdoing.¹⁵⁹

In 2015, Kemp’s office similarly launched an investigation into the Asian American Legal Advocacy Center (“AALAC”), an organization which had previously criticized Secretary Kemp for not registering all voters who had submitted voter registrations to Georgia. Secretary Kemp pursued the investigation for over two years before finding no evidence of wrongdoing. One journalist tracking these investigations described them as “legal terrorism, exploiting the law to intimidate and discourage citizens from accessing their constitutional right to vote.”¹⁶⁰

¹⁵⁶ Ward, “How a Criminal Investigation in Georgia Set an Ominous Tone for African-American Voters.”

¹⁵⁷ Ariel Hart, “Voting Case Mirrors National Struggle,” *The Atlanta Journal-Constitution*, December 13, 2014; Gloria Tatum, “Voter Fraud Charges from 2020 Fizzle in Quitman, South Georgia,” *The Atlanta Progressive News*, September 18, 2014, <http://atlantaprogressivenews.com/2014/09/18/voter-fraud-charges-from-2010-fizzle-in-quitman-south-georgia/> (accessed April 27, 2021).

¹⁵⁸ Steve Benen, “Georgia GOP Official Express Concerns About ‘Minority Voters,’” MSNBC, September 11, 2014. <https://www.msnbc.com/rachel-maddow-show/georgia-gop-official-express-concerns-about-minority-voters-msna410401> (accessed April 27, 2021).

¹⁵⁹ Spencer Woodman, “Register Minority Voters in Georgia, Go to Jail,” *The New Republic*, May 5, 2015, <https://newrepublic.com/article/121715/georgia-secretary-state-hammers-minority-voter-registration-efforts> (accessed May 10, 2021); “State launches fraud investigation into voter registration group,” *WSB-TV 2* (Atlanta, Georgia), September 9, 2014;

¹⁶⁰ Austin Adkins, “Opinion: Voter Fraud Investigations Weaponized to Suppress Voters,” *The Mainline*, November 3, 2019, <https://www.mainlinezine.com/voter-fraud-investigations-weaponized-to-suppress-voters/>; Michael Wines, “Critics See Efforts by Counties and Towns to

iii. Voting Restrictions in Georgia Post-*Shelby County*

After the Supreme Court invalidated the existing coverage formula in *Shelby County, Alabama v. Holder*, 570 U.S. 529 (2013), Georgia was no longer bound to submit any changes it made to its voting system through a preclearance regime. In her dissent in that case, Justice Ginsburg famously commented that “throwing out preclearance when it has worked and is continuing to work to stop discriminatory changes is like throwing away your umbrella in a rainstorm because you are not getting wet.” *Id.* at 590 (J. Ginsburg, dissenting). A few days after the decision, Daniel O. Franklin, a professor of political science at Georgia State University, predicted that “the court’s decision will likely change very little” in Georgia and the other preclearance states.¹⁶¹ Franklin was wrong: Georgia took advantage of this change almost immediately.

Within four days of *Shelby County*, for example, the local Georgia press reported that the Augusta-Richmond County government (a consolidated city-county government) re-opened discussions of moving its elections from November to July. This change matters: Moving elections away from the usual election day, invariably reduces voter turnout and usually has an adverse impact on minority voter turnout, and DOJ had previously rejected the proposed change under Section 5. After a series of closed-door meetings, Augusta-Richmond County government changed the date of their elections in early 2014, just months after *Shelby County*.¹⁶² Similarly, Greene County, Georgia approved a redistricting plan that would have eliminated one or two of the only Black districts on the county commission—a change that DOJ had previously refused to preclear. By the end of 2013, the Georgia General Assembly approved another plan for Greene County that reduced the Black voting age population in one district by 50% and placed the home of the other

Purge Minority Voters From Rolls,” *New York Times* (New York, NY), July 31, 2016, <https://www.nytimes.com/2016/08/01/us/critics-see-efforts-to-purge-minorities-from-voter-rolls-in-new-elections-rules.html>; Kristina Torres, “Georgia suit settled alleging black voters wrongfully disqualified,” *Atlanta Journal-Constitution* (Atlanta, GA), March 16, 2017, <https://www.ajc.com/news/state--regional-govt--politics/georgia-suit-settled-alleging-black-voters-wrongfully-disqualified/djDIYjpvYJcZW8CJzgKL/>.

¹⁶¹ Daniel P. Franklin, “Court’s Decision is Likely to Change Little,” *Atlanta Journal Constitution* (June 30, 2013).

¹⁶² Harry Baumgarten, “*Shelby County v. Holder*’s Biggest and Most Harmful Impact May Be On Our Nation’s Smallest Towns,” Harry Baumgarten, Campaign Legal Center, 20 June 2016, <https://campaignlegal.org/update/shelby-county-v-holders-biggest-and-most-harmful-impact-may-be-our-nations-smallest-towns>

Black commissioner outside of the boundaries of the newly redrawn district. Without preclearance, the new redistricting plan went into effect.¹⁶³

But preclearance itself was never a panacea even before *Shelby County*. With Georgia's 159 counties and hundreds of local jurisdictions (part of the over 30,000 jurisdictions in the preclearance states), it was impossible to keep track of every local jurisdiction, many of which refused to file voting-related changes with DOJ. At-large, county-wide, or city-wide voting has been historically one of the main tactics used to curb voting rights strength. Preclearance had hardly ended the practice. In December 2013, of Georgia's 159 counties, thirty-four elected all county commissioners at-large. One of those was Baker County, where almost half of the population was Black, but all of the county commissioners were white. A former Baker County Commissioner, Robert Hall, was quoted in the *Atlanta Journal Constitution* as saying, "we don't have many Blacks in Baker County that are landowners and taxpayers and responsible."¹⁶⁴ This trend is not unique to Baker County. In December 2013, the *Atlanta-Journal Constitution* reported that across Georgia, while "more than half of majority-black counties have majority-white commissions," "no majority-white county has a majority-black commission."¹⁶⁵ These type of election arrangements continue to disadvantage Black Georgians: As of 2013, in Georgia, white Georgians were 59% of registered voters, but accounted for 77% of the commissioners, while for Black Georgians who were 30% of registered voters, but accounted for only 22% of county commissioners.¹⁶⁶

Overall, the end of preclearance has opened the doors to all manner of voter suppression and disenfranchisement, largely directed against minorities. The U.S. Commission on Civil Rights, found that among the former preclearance states as of 2018, only Georgia had adopted all five of the most common restrictions that impose roadblocks to the franchise for minority voters, including (1) voter ID laws, (2) proof of citizenship requirements, (3) voter purges, (4) cuts in

¹⁶³ Ariel Hart, Jeff Ernsthausen, and David Wickett, "Disputed Voting Systems, Racial Power Gap Persists," *Atlanta Journal Constitution*, (Dec. 7, 2013).

¹⁶⁴ *Id.*

¹⁶⁵ *Id.*

¹⁶⁶ *Id.*; Ariel Hart, Jeff Ernsthausen, and David Wickett, "Racial Politics Not So Clear Cut," *Atlanta Journal Constitution*, (Dec. 9, 2013)

early voting, and (5) widespread polling place closures.¹⁶⁷ This report discusses a few of these changes below, concluding with a brief overview of Senate Bill 202, passed by the Georgia General Assembly in 2021, which the U.S. Department of Justice has challenged under Section 2 of the Voting Rights Act as a law with the effect and intent of making it more difficult for Black Georgians to vote.

a. Polling Place Closures

In a 2015 memo to local election officials, then-Secretary of State Kemp encouraged counties to reduce voting locations, noting that “as a result of the *Shelby vs. Holder* [sic] Supreme Court decision, [counties are] no longer required to submit polling place changes to the Department of Justice for preclearance.”¹⁶⁸ And to be sure, in the first presidential election after *Shelby County*, throughout Georgia “dozens of polling places” were “closed, consolidated, or moved.”¹⁶⁹ In Macon-Bibb County, a majority-Black county, the number of polling places dropped from forty to thirty-two; those closures took place in primarily Black neighborhoods. When the Memorial Gym precinct in Macon, in a Black neighborhood, was closed for renovations, local officials suggested the sheriff’s office as an alternative. Lowndes County, which has a substantial Black population, reduced the number of polling places from thirty-seven to nine, and Tift County was considering, until heated local protests, consolidating all twelve county polling places into a single location. Hancock County proposed closing several polling places, including one in a Black neighborhood that was seventeen miles from its nearest alternative, in downtown Sparta. Hancock County relented only after an outcry from the Georgia NAACP and the Georgia Lawyers’ Committee for Civil Rights Under the Law, who claimed that “the planned closures would have

¹⁶⁷ U.S. Commission on Civil Rights, *An Assessment of Minority Voting Rights Access in the United States: 2018 Statutory Enforcement Report* (Washington, 2018), 369. The restrictions on naturalized citizens were later curtailed; see “Georgia Must Ease Rules Proving Citizenship, Judge Says” PBS News Hour, <https://www.pbs.org/newshour/politics/georgia-must-ease-rule-for-voters-proving-citizenship-judge-says> (Nov. 2, 2018).

¹⁶⁸ The Leadership Conference Education Fund, *Democracy Diverted: Polling Place Closures and the Right to Vote* (Sept. 2019), 32. According to this report, then-Secretary of State Kemp “encouraged counties to consolidate voting locations. He specifically spelled out twice – in bold font – that noting that ‘as a result of the *Shelby vs. Holder* Supreme Court decision, [counties are] no longer required to submit polling place changes to the Department of Justice for preclearance.’”

¹⁶⁹ Kristina Torres, “Cost-Cutting Raises Voter Access Fears,” *Atlanta Journal Constitution*, (Oct. 13, 2016); Kristina Torres, “State Monitored For Voting Rights Issues,” *Atlanta Journal Constitution*, (Jun. 20, 2016).

disproportionately affected voters in the majority Black county in poor and rural areas with no access to regular transportation.”¹⁷⁰

By 2019, the Leadership Conference Education Fund found that Georgia had closed over 200 polling locations in Georgia since the *Shelby County* decision despite adding millions of voters to the voter rolls.¹⁷¹ By 2019, “eighteen counties in Georgia closed more than half of their polling places, and several closed almost 90 percent.”¹⁷² In 2020, the nine counties in metro Atlanta that had nearly half of the registered voters (and the majority of the Black voters in the state) had only 38% of the state’s polling places.¹⁷³ Unsurprisingly, because of the fewer polling places, the lines at majority-Black polling places increased, and sometimes dramatically so. In the June 2020 primary, for example, waiting times to vote in some metro Atlanta suburbs, such as Union City (a subdivision that is 88% Black majority) was as long as five hours.¹⁷⁴ Union City was not an outlier. A 2020 study found that “about two-thirds of the polling places that had to stay open late for the June primary to accommodate waiting voters were in majority-Black neighborhoods, even though they made up only about one-third of the state’s polling places.”¹⁷⁵

b. Voter Purges and Challenges

After *Shelby County*, Georgia officials also made more systematic efforts to purge the voting rolls in ways that particularly disadvantaged minority voters and candidates. Between 2012 and 2018, for example, then-Secretary of State Kemp removed 1.4 million voters from the eligible voter rolls. In a single day in 2017, Georgia removed over 500,000 names from the list of 6.6 million registered voters, which according to election law experts might be the “largest mass disenfranchisement in U.S. history.”¹⁷⁶ While there can be legitimate reasons to drop names from

¹⁷⁰ *Id.*

¹⁷¹ The Leadership Conference Education Fund, *Democracy Diverted: Polling Place Closures and the Right to Vote* (Sept. 2019), 31.

¹⁷² *Id.*

¹⁷³ Stephen Fowler, “Why Do Nonwhite Georgia Voters Have to Wait in Line for Hours? Their Numbers Have Soared, and Their Polling Places Have Dwindled,” *ProPublica*, <https://www.propublica.org/article/why-do-nonwhite-georgia-voters-have-to-wait-in-line-for-hours-their-numbers-have-soared-and-their-polling-places-have-dwindled>, (Oct. 17, 2020).

¹⁷⁴ Mark Niese and Nick Thieme, “Fewer Polls Cut Voter Turnout Across Georgia,” *Atlanta Journal Constitution*, 15 December, 2009; Fowler, “Why Do Nonwhite Georgia Voters Have to Wait in Line for Hours?”

¹⁷⁵ Fowler, “Why Do Nonwhite Georgia Voters Have to Wait in Line for Hours?”

¹⁷⁶ Alan Judd, “Georgia’s Strict Laws Lead to Large Purge of Voters,” *Atlanta Journal Constitution*, 27 October, 2018

the eligibility rolls (such as for a voter who is deceased, who has moved, or who has a felony conviction), the vast majority of those purged were those who simply had not voted in intervening years. While those kinds of purges are technically permitted (though not required) by federal law, those purged were significantly over-represented in precincts that overwhelmingly voted for Stacey Abrams, the Black candidate in the 2018 gubernatorial race.¹⁷⁷

One of the most insidious forms of voter disenfranchisement by Georgia in recent years which disproportionately affected minority voters was Georgia’s “exact matching” procedures. As the Northern District of Georgia has explained, Georgia’s exact match procedures policies meant that when a prospective voter submitted a voter registration application, Georgia would check the registration against its Department of Driver Services (“DDS”) or files from the Social Security Administration (“SSA”). If the applicants’ information did not match those files exactly, “then the voter registration application is placed in ‘pending status,’ and the person may not vote until the person corrects the information. The burden is on the applicant to take the next steps to correct any information and/or present the necessary proof required to the appropriate officials to become a Georgia voter.” *Georgia Coal. for People's Agenda, Inc. v. Kemp*, 347 F. Supp. 3d 1251, 1255–56 (N.D. Ga. 2018). If the voter did not present new information, their application was rejected. *Id.*

The legal history of exact-match legislation in Georgia is complex. It was originally passed by the Georgia General Assembly in 2008, and was originally blocked under preclearance, though it received Department of Justice approval in 2010 when the Secretary of State agreed to place “safeguards” on the practice. As the Department of Justice later argued, however, it is not clear if those safeguards were ever used. After *Shelby County*, Georgia operated the exact match procedures without strict safeguards, leading to federal suits such as the one above.

As civil rights groups have shown, Georgia’s exact match procedures were more likely to disenfranchise minority voters. Between 2013 and 2016, more than 34,000 Georgia voters’ applications were suspended using the exact-match system. Under the DDS match, Black Georgians, who made up only 28.2 percent of the registered voters, were 53.3 percent of those voters whose applications were cancelled or placed in pending status. By contrast, non-Hispanic

¹⁷⁷ Angela Caputo, Geoff Hing, and Johnny Kaufman, “After the Purge: How a Massive Voter Purge Affected the 2018 Election,” APM Reports, <https://www.apmreports.org/story/2019/10/29/georgia-voting-registration-records-removed> (Oct. 29, 2019).

whites, who were almost half of registered voters in Georgia, made up a far lower 18.3 percent of those applications that were canceled or pending. Under the SSA match, the discrepancy was even starker. Black Georgians made up 74.6 percent of those in the cancelled and pending files, while non-Hispanic whites were only 9.5 percent. By July 2018, 51,111 voters' applications were suspended, and placed in the "pending voter" category, of whom 80% were either African American, Hispanic/Latino, or Asian.¹⁷⁸ By 2019, Georgia agreed to largely abandon its exact matching process.¹⁷⁹

Voter challenges directed at minority voters have also persisted in modern Georgia. In advance of the 2016 election, the Hancock County Election Board, which at the time was majority white, used the voter challenge process to challenge approximately 180 voters, almost all of whom were Black. Those Black residents made up nearly a fifth of the city's registered voters. In pursuit of the challenges, the Hancock County Board dispatched the local police to summon those Black residents to hearings to prove their residence or lose their voting rights. Many thought they were being arrested, and many of those challenged were intimidated and did not vote in the fall election. The white candidate for mayor won a narrow victory.¹⁸⁰

Although the Hancock County attorney denied that this purge was "about . . . race," the Georgia State Conference of the NAACP, the Georgia Coalition for the People's Agenda, and four voters who had their registrations challenged sued the Hancock County Board of Elections seeking an injunction to force the Board to end their use of the challenge procedures. The U.S. District Court for the Northern District of Georgia later ordered the defendants to pay the plaintiffs'

¹⁷⁸ Abrams, *Our Time is Now*, 58–61; Anderson, *One Person, No Vote*, 78–81; McCrary Report.

¹⁷⁹ Aja Arnold, "Ex Post Facto: Abrams v Kemp," *The Mainline* 11 May 2020, <https://www.mainlinezine.com/ex-post-facto-abrams-vs-kemp-2018/>; Brentin Mook, "How Dismantling the Voting Rights Act Helped Georgia Discriminate Again," *Bloomberg City Lab*, 15 October, 2018, <https://www.bloomberg.com/news/articles/2018-10-15/how-georgia-s-exact-match-program-was-made-possible>; Stanley Augustin, "Georgia Largely Abandons its Broken 'Exact Match' Voter Registration Process," *Lawyers' Committee For Civil Rights*, 5 April, 2019, <https://www.lawyerscommittee.org/georgia-largely-abandons-its-broken-exact-match-voter-registration-process/>

¹⁸⁰ Michael Wines, "Critics: Racial Bias Creeping Back Into Electoral Purges," *Atlanta Journal Constitution*, 1 August, 2016

attorney fees and required the Board of Elections to follow a strict process that required the Board to notify the plaintiffs' counsel if the Board made any future voter challenges.¹⁸¹

c. Senate Bill 202

Of final note is the Georgia General Assembly's passage of Senate Bill (SB) 202 in the spring of 2021 in the wake of significant minority voting strength in Georgia and the election of Georgia's first Black United States Senator. SB 202 is currently the subject of multiple lawsuits which allege that it violates both Section 2 of the VRA and the Fourteenth and Fifteenth Amendments, including by the United States Department of Justice.¹⁸²

These allegations are not surprising. Many of the provisions of SB 202 target methods of voting that Black voters used to tremendous effect in the 2020 General Election and 2021 Runoff election, and also specifically target voting in the Atlanta metro area, home to the majority of Georgia's Black voters.¹⁸³ While SB 202 has more than 40 provisions, some of its most notable changes are: (1) reducing the time available to request an absentee ballot, (2) increasing identification requirements for absentee voting, (3) banning state and local governments from sending unsolicited absentee ballot applications, (4) limiting the use of absentee ballot drop boxes, (5) banning mobile polling places, (6) and prohibiting anyone who is not a poll worker from giving food or drink to voters in line to vote.¹⁸⁴

One of SB 202's most notable changes to voting access is to drop boxes, which were used extensively by Black voters in the 2020 General Election. In that election, in the four core Atlanta Metro counties, Cobb, DeKalb, Fulton, and Gwinnett, 56% of absentee ballot voters, or 305,000

¹⁸¹ *Ga. State Conference of the NAACP v. Hancock Cnty. Bd. of Elections & Registration*, No. 5:15-CV-00414 (CAR) (M.D. Ga. Mar. 30, 2018); Michael Wines, "Critics See Efforts by Counties and Towns to Purge Minority Voters From Rolls," *New York Times* (New York, NY), July 31, 2016, <https://www.nytimes.com/2016/08/01/us/critics-see-efforts-to-purge-minorities-from-voter-rolls-in-new-elections-rules.html>; Kristina Torres, "Georgia suit settled alleging black voters wrongfully disqualified," *Atlanta Journal-Constitution* (Atlanta, GA), March 16, 2017, <https://www.ajc.com/news/state--regional-govt--politics/georgia-suit-settled-alleging-black-voters-wrongfully-disqualified/djDIIfYjpvYJJcZW8CJzgKL/>

¹⁸² *See United States v. Georgia*, No. 1:21-cv-02575 (N.D. Ga. June 25, 2021).

¹⁸³ For a helpful summary, see Stephen Fowler, "What Does Georgia's New Voting Law SB 202 Do?" NPR, <https://www.gpb.org/news/2021/03/27/what-does-georgias-new-voting-law-sb-202-do>

¹⁸⁴ Georgia Senate Bill 202 (2021); see also Stephen Fowler, "What Does Georgia's New Voting Law SB 202 Do?" NPR, <https://www.gpb.org/news/2021/03/27/what-does-georgias-new-voting-law-sb-202-do>

of 547,000, used drop boxes.¹⁸⁵ After SB 202, the number of drop boxes in those counties will drop from the 111 available in the 2020 election to 23.¹⁸⁶ In Fulton County, the number will drop from 38 to 8. Cobb County Election Director Janine Eveler told the *Atlanta Journal-Constitution* that drop boxes “are no longer useful. The limited numbers mean you cannot deploy them in sufficient numbers to reach the voting population.”¹⁸⁷

SB 202 also made significant changes to how votes will be counted and who will supervise the counting. These changes included (1) removing the Secretary of State as the Chair of the State Election Board and replacing the Chair with someone appointed by a majority of the Georgia General Assembly, (2) giving the State Election Board (and by extension the Georgia General Assembly) more power to intervene in county election boards, and (3) allowing the State Election Board (and by extension the Georgia General Assembly) more power to suspend election board members and replace them.¹⁸⁸

The collective impact of these provisions is substantial. University of Georgia Political Scientist Charles Bullock explained that when all the obstacles in SB 202 are considered “as a package, the bill’s voting restrictions could deter thousands of people from voting in future elections” and could very well alter the outcome of close statewide races.¹⁸⁹ “Each new obstacle,” Dr. Bullock explained, “has the potential to stop voters ... from participating in democracy.”¹⁹⁰

Indeed, SB 202 is already being used against county election officials, and particularly Black officials. By June 2021, Georgia County commissions had replaced ten county election

¹⁸⁵ Niese, et. al., “Drop box use heavy in Democratic areas before Georgia voting law,” *Atlanta Journal-Constitution*, July 12, 2021, <https://www.ajc.com/politics/drop-box-use-soared-in-democratic-areas-before-georgia-voting-law/N4ZTGHLWD5BRBOUKBHTUCFVOEU/>.

¹⁸⁶ “How New State Voting Laws Could Impact Voters,” *Brennan Center for Justice*, September 1, 2021, <https://www.brennancenter.org/our-work/research-reports/how-new-state-voting-laws-could-impact-voters>.

¹⁸⁷ Mark Niese, “ID Law Adds Hurdles For Thousands,” *AJC*, 1 June, 2021; “Application For Official Georgia Absentee Ballot,” https://sos.ga.gov/admin/uploads/2021_Absentee_Ballot_Application2.pdf; “Democratic Counties Showed Higher Drop Box Use”

¹⁸⁸ Georgia Senate Bill 202 (2021); see also Stephen Fowler, “What Does Georgia’s New Voting Law SB 202 Do?”

¹⁸⁹ Mark Niese, *New Georgia law changes voting rules—and maybe results*, *Atlanta-Journal Constitution* (Mar. 28, 2021), available at <https://www.ajc.com/politics/new-georgia-law-changes-voting-rules-and-maybe-results/4QBKQXRS45GUZHBSQ67W4FVLR/>.

¹⁹⁰ *Id.*

officials, most Democrats, half of them Black.¹⁹¹ As of December 2021, six counties in Georgia have fully reorganized their county board of supervisors since the passage of SB 202. In Spaulding County, in particular, the three Black women who constituted a majority of the Board has been replaced, as has the elections supervisor. A majority of three white Republicans now control the board and has already moved to restrict voting access, including by eliminating Sunday voting.¹⁹² In five of the counties that restructured election boards—Troup, Morgan, Pickens, Stephens, and Lincoln—the legislature shifted the power to appoint some or all election board to local county commissioners, all of which are controlled by Republicans. Previously the appointments had been split evenly between the local Democratic and Republican parties, with the intent to ensure a politically balanced election board.¹⁹³ In December, 2021, Lincoln County, whose elections board was recently disbanded under SB 202, indicated plans to close six of the county’s seven polling places, a move that would require some registered voters to travel as far as twenty-three miles to the nearest polling site and which would disadvantaging the county’s Black voters.¹⁹⁴ And while it has not yet occurred, shortly after the passage of SB 202, the Georgia State Election Board set up a review board to review the performance of the Fulton County Election Board, setting up the prospect for a takeover of the Elections Board in Fulton, the home of hundreds of thousands of Black Georgians.¹⁹⁵

d. Electoral success of Black candidates.

Even today, more than fifty years after the original 1965 VRA, most Black candidates in Georgia are only able to win in districts which are majority Black. The following tables show just how stark this phenomenon has been in Georgia’s 2020 elections for the General Assembly. In the

¹⁹¹ Nick Corasanti and Reid J. Epstein, “How Republican States Are Expanding Their Power Over Elections,” *New York Times*, July 1, 2021, <https://www.nytimes.com/2021/06/19/us/politics/republican-states.html>; Mark Niese and Brad Branch, “Fulton County Elections Takeover Mulled,” 27 July, 2021

¹⁹² James Oliphant and Nathan Layne, Georgia Republicans purge Black Democrats from County Election Boards, Reuters, Reuters, 9 December 2021, <https://www.reuters.com/world/us/georgia-republicans-purge-black-democrats-county-election-boards-2021-12-09/>.

¹⁹³ *Id.*

¹⁹⁴ Susan McCord, “Lincoln County Looks to Eliminate All Polling Places But One,” *Augusta Chronicle*, 21 December, 2021.

¹⁹⁵ Nick Corasanti and Reid J. Epstein, “How States are Expanding Their Control Over Elections,” *New York Times*, 19 June, 2021; Mark Niese and Brad Branch, “Fulton County Elections Takeover Mulled,” 27 July, 2021

Georgia House, for example, none of Georgia's Black House members were elected from a district with more than 55% white voters. In the Georgia Senate, none of Georgia's Black Senators were elected from a district with more than 47% white voters. This trend is not surprising given the historically pervasive racially polarized voting in the state. These figures are shown below:¹⁹⁶

Winning Candidates in 2020 in Georgia House of Representatives

Percentage white registered voters in district	White Republicans ¹⁹⁷	Black Democrats	White Democrats
Under 40%	0	48	7
40–46.2%	1	3	2
46.2–54.9	11	1	6
55–62.4%	23	0	5
Over 62.4%	68	0	0

Winning Candidates in 2020 in Georgia State Senate

Percentage white registered voters in district	White Republicans	Black Democrats	White Democrats
Under 47%	0	16	1
47–54.9%	3	0	3
Over 55%	51	0	0

Black candidates have faced similar difficulties in running for statewide office throughout the South. The three victories of Raphael Warnock, in the 2020 general election, in the 2020 runoff, and in the 2022 general election, are rare instances of a Black candidate winning statewide office.

¹⁹⁶ Lawyers Committee for Civil Rights, *The Central Role of Racial Demographics in Georgia Elections: How Race Affects Elections for the Georgia General Assembly* (May 2021).

¹⁹⁷ There are currently no Black Republicans in the Georgia General Assembly.

According to a recent study (2022) reflected in the table below, from 1989 to 2018 Black success in statewide races in the South is rare.¹⁹⁸

Success of Candidates for Statewide Office in the South, 1989-2018

A. Democrats

Race of candidate	Democrats won %	Democrats Lost	n
White	42.6	57.4	455
Black	15.9	84.1	69
Latino	25	75	16
Total	38.7	63.3	540

B. Republicans

Race of Candidate	Republicans won%	Republicans lost%	n
White	61.4	38.6	526
Black	20	80	5
Latino	77.8	22.2	9
Total	61.3	38.7	540

V. THE RELATIONSHIP BETWEEN RACE AND PARTISANSHIP IN GEORGIA POLITICS

A. Historical Foundations of the Partisan Divide Among Black and White Georgians

Since Reconstruction, conservative whites in Georgia and other southern states have more or less successfully and continuously held onto power. While the second half of the twentieth century was generally marked by a slow transition from conservative white Democrats to conservative white Republicans holding political power, the reality of conservative white political dominance did not change. As discussed below, the Democratic Party's embrace of civil rights

¹⁹⁸ Charles Bullock III, Susan A. McManus, Jeremy D. Mayer, and Mark Rozell, *African American Statewide Candidates in the New South*, (New York: Oxford University Press, 2022), 8, 9. The tables include all of the states of the Old Confederacy except for Louisiana. The volumes cover has photographs of Stacey Abrams and Raphael Warnock.

legislation—and the Republican Party’s opposition to it—was the catalyst of this enduring political transformation.¹⁹⁹

The Democratic Party’s embrace of civil rights policies in the mid-20th Century caused Black voters to leave the Republican Party (the Party of Lincoln) for the Democratic Party. At the same time, the Democratic Party’s embrace of civil rights legislation sparked what Earl Black and Merle Black describe as the “Great White Switch,” in which white voters abandoned the Democratic Party for the Republican Party. In the 1948 presidential election, South Carolina Governor J. Strom Thurmond mounted a third-party challenge against Democratic President Harry Truman in protest of Truman’s support for civil rights, including his integration of the armed forces. Thurmond ran on the so-called Dixiecrat party which claimed the battle flag of the Confederacy for its symbol. Thurmond’s campaign ended Democratic dominance of deep South states by winning South Carolina, Alabama, Mississippi, and Louisiana.²⁰⁰

This trend of white voters in Georgia abandoning the Democratic Party due to its support of civil rights was readily apparent in the 1964 and 1968 presidential elections. In 1964, the Republican nominee, Barry Goldwater, won only six states in a landslide defeat to President Lyndon B. Johnson: his home state of Arizona, and all five states comprising the Deep South (South Carolina, Georgia, Alabama, Mississippi, and Louisiana). In fact, Goldwater was the first Republican presidential candidate to *ever* win Georgia’s electoral votes.²⁰¹ In 1968, Georgia’s electoral votes were won by George Wallace, another third-party presidential candidate who ran on a platform of vociferous opposition to civil rights legislation.²⁰² And other than favorite son Jimmy Carter, no Democratic nominee for President has since won Georgia’s electoral votes until President Joe Biden’s victory in 2020.

¹⁹⁹ Nancy J. Weiss, *Farewell to the Party of Lincoln: Black Politics in the Age of FDR* (Princeton, NJ: Princeton University Press, 1983); Barbara M. Linde, *African Americans in Political Office: From the Civil War to the White House* (New York: Lucent Press, 2015).

²⁰⁰ Joseph Crespino, *Strom Thurmond’s America: A History* (New York: Farrar, Straus and Giroux, 2012); Nadine Cohodas, *Strom Thurmond and The Politics of Southern Change* (Macon: Mercer University Press, 1993); Jack Bass & Marilyn W. Thompson, *Strom: The Complicated Personal and Political Life of Strom Thurmond* (New York: Public Affairs, 2005).

²⁰¹ “1964,” The American Presidency Project, *available at* <https://www.presidency.ucsb.edu/statistics/elections/1964> (last accessed Dec. 5, 2022).

²⁰² “1968,” The American Presidency Project, *available at* <https://www.presidency.ucsb.edu/statistics/elections/1968> (last accessed Dec. 5, 2022).

White southerners abandoned the Democratic Party for the Republican Party because the Republican Party identified itself with racial conservatism. Consistent with this strategy, Republicans today continue to use racialized politics and race-based appeals to attract racially conservative white voters.²⁰³ As Goldwater told a group of Republicans from southern states, it was better for the Republican Party to forego the “Negro vote” and instead court white southerners who opposed equal rights.²⁰⁴ Historians and political scientists agree that Goldwater “sought to create a general polarization of southern voters along racial lines.” The effectiveness of what was called the “Southern strategy” during Richard Nixon’s presidency had a profound impact on the development of the nearly all-white modern Republican Party in the South. South Carolinian Harry Dent, who had previously worked for Senator Strom Thurmond, became Nixon’s advisor and helped implement the “Southern strategy.”²⁰⁵ Although more subtle in his appeal to white southern voters, Nixon followed the advice of Republican Party strategist Kevin Phillips in 1970. Phillips argued that “[t]he GOP can build a winning coalition without Negro voters.” He understood, and made certain others understood, that “Negro-Democratic mutual identification” was important for the building of a white Republican Party in the South. With Phillips’s Southern Strategy, the Democratic Party in the South became identified as the “Negro party through most of the South.” With the Democratic Party identified with African Americans, whites in the South would become Republicans, and that would allow the Republican Party to become the majority party in what had

²⁰³ Earl Black & Merle Black, *Politics and Society in the South* (Cambridge: Harvard University Press, 1987); Thomas F. Schaller, *Whistling Past Dixie: How Democrats Can Win Without the South*, (New York: Simon and Schuster, 2006), 65; Kevin P. Phillips, *The Emerging Republican Majority* (New Rochelle, NY: Arlington House, 1969); Dan T. Carter, *Politics of Rage: George Wallace, the Origins of the new Conservatism, and the Transformation of American Politics* (Baton Rouge: Louisiana State University Press, 2000); Dan T. Carter, *From George Wallace to Newt Gingrich: Race in the Conservative Counterrevolution, 1963-1994* (Baton Rouge: Louisiana State University Press, 1996); Rick Perlstein, *Before the Storm: Barry Goldwater and the Unmaking of the American Consensus* (New York: Hill and Wang, 2001); Timothy N. Thurber, *Republicans and Race: The GOP’s Frayed Relationship with African Americans, 1945-1974* (2013); Heather Cox Richardson, *To Make Men Free: A History of the Republican Party* (New York: Basic Books, 2021), 10, 11, 321-408, 456-475.

²⁰⁴ Dan T. Carter, “Unfinished Transformation: Matthew J. Perry’s South Carolina,” in *Matthew J. Perry: The Man, His Times, and His Legacy*, ed., W. Lewis Burke and Belinda F. Gergel (Columbia: University of South Carolina Press, 2004), 251.

²⁰⁵ David Stout, “Harry Dent, an Architect of Nixon ‘Southern Strategy,’ Dies at 77,” N.Y. Times (Oct. 2, 2007), available at <https://www.nytimes.com/2007/10/02/us/02dent.html>.

traditionally been the solid Democratic South.²⁰⁶ After studying Phillips's plan, Nixon told his staff to implement the strategy and emphasized, "don't go for Jews and Blacks."²⁰⁷

Matthew D. Lassiter, a historian of the Atlanta suburbs, observed that "the law-and-order platform at the center of Nixon's suburban strategy tapped into Middle American resentment toward antiwar demonstrators and black militants but consciously employed a color-blind discourse that deflected charges of racial demagoguery."²⁰⁸ And John Ehrlichman, President Nixon's domestic policy advisor, admitted in 1994 that the war on drugs—a key part of law-and-order campaigns—had an ulterior motive. He observed that "the Nixon campaign in 1968, and the Nixon White House after that, had two enemies: the antiwar left and black people." While the Nixon campaign "couldn't make it illegal to be either against the war or black," they knew that "by getting the public to associate the hippies with marijuana and blacks with heroin, and then criminalizing both heavily, [they] could disrupt those communities."²⁰⁹

Georgia is a flash point of this modern strategy. According to Dr. Peyton McCrary, a historian who recently retired after a 26-year career with the Department of Justice: "In Georgia politics since 2002, state government is dominated by the Republican Party, the party to which now most non-Hispanic white persons belong. The greatest electoral threat to the Republican Party and Georgia's governing elected officials is the growing number of African American, Hispanic, and Asian citizens, who tend strongly to support Democratic candidates. The increase in minority population and the threat of increasing minority voting strength provides a powerful incentive for Republican officials at the state and local level to place hurdles in the path of minority citizens seeking to register and vote. That is what has happened."²¹⁰ Moreover, "In white-majority Georgia,

²⁰⁶ Kevin P. Phillips, *The Emerging Republican Majority* (New York: Arlington House, 1969), 467-68.

²⁰⁷ Carter, *From George Wallace to Newt Gingrich*, 45; Kenneth O'Reilly, *Nixon's Piano: Presidents and Racial Politics from Washington to Clinton* (New York: Free Press, 1995), 285-86; Dan Carter, "Civil Rights and Politics in South Carolina: The Perspective of One Lifetime, 1940-2003" in *Toward the Meeting of the Waters: Currents in the Civil Rights Movement of South Carolina during the Twentieth Century*, ed. Winfred B. Moore, Jr. and Orville Vernon Burton (Columbia: University of South Carolina Press, 2008), 413.

²⁰⁸ Matthew D. Lassiter, *The Silent Majority: Suburban Politics in the Sunbelt South* (Princeton, NJ: Princeton University Press, 2006), 234.

²⁰⁹ Dan Baum, "Legalize It All," *Harper's* (April 2016).

²¹⁰ Expert Rep. of Dr. Peyton McCrary at 8, *Fair Fight Action v. Raffensperger*, No. 1:18-cv-05391SCJ, (N.D. Ga. Apr. 24, 2020), ECF No. 339 ("McCrary Report").

Republicans benefitted from a pattern of voting that was polarized along racial lines.”²¹¹ University of Georgia political scientist Charles Bullock noted that “the relationship between race and voting in 2002 was striking.”²¹² Moreover, Bullock and Keith Gaddie showed that “since 1992, Democrats have always taken at least 80 percent of the black vote while most whites invariably preferred Republicans.”²¹³ Indeed, the racial bloc voting in Georgia is so strong, and race and partisanship so deeply intertwined, that statisticians refer to it as multicollinearity, meaning one cannot, as a scientific matter, separate partisanship from race in Georgia elections.²¹⁴

To be sure, Republicans nominated a Black candidate—Herschel Walker, a former University of Georgia football legend—to challenge Senator Raphael Warnock in the 2022 general election for U.S. Senate. But Walker’s nomination only underscores the extent to which race and partisanship remain intertwined. Republican leaders in Georgia admittedly supported Walker because they wanted to “peel[] off a handful of Black voters” and “reassure white swing voters that the party was not racist.”²¹⁵ The strategy failed. Exit polls clearly showed that Warnock remained the candidate of Black voters and Walker was the candidate of white voters.²¹⁶ In fact, Walker’s share of the Black vote was virtually identical to that of Governor Brian Kemp, who was also on the general election ballot in his re-election bid against Stacey Abrams.²¹⁷

	U.S. Senate	Governor
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²¹¹ McCrary Report at 30.

²¹² Charles S. Bullock III, “Georgia: Republicans at the High Water Mark?” in Bullock and Mark J. Rozell (eds.), *The New Politics of the Old South* (New York, Rowman & Littlefield, 5th ed. 2014), 58.

²¹³ Charles S. Bullock III & Ronald Keith Gaddie, *The Triumph of Voting Rights in the South* (Norman, University of Oklahoma Press, 2009), 100.

²¹⁴ Donald E. Farrar & Robert R. Glauber, “Multicollinearity in Regression Analysis: The Problem Revisited,” *Review of Economics and Statistics*, XLIX (February 1967), 92-107, esp. p. 98; Peyton McCrary, Clark Miller, & Dale Baum, “Class and Party in the Secession Crisis: Voting Behavior in the Deep South, 1856-1861,” *Journal of Interdisciplinary History* viii:3 (Winter 1978): 450, n.35.

²¹⁵ Cleve R. Wootson Jr., “Herschel Walker’s Struggles Show GOP’s Deeper Challenges in Georgia,” *Washington Post* (Sept. 22, 2022), <https://www.washingtonpost.com/politics/2022/09/22/herschel-walker-georgia-black-voters/>

²¹⁶ NBC News, Georgia Senate Exit Polls (Nov. 8, 2022), *available at* https://www.nbcnews.com/politics/2022-elections/georgia-senate-results?icid=election_statenav; NBC News, Georgia Governor Exit Polls, (Nov. 8, 2022), *available at* https://www.nbcnews.com/politics/2022-elections/georgia-governor-results?icid=election_statenav.

²¹⁷ *See supra* n.218.

	WARNOCK (D)	WALKER (R)	ABRAMS (D)	KEMP (R)
Black men	85%	12%	84%	14%
Black women	93%	5%	93%	6%
White men	27%	71%	23%	76%
White women	30%	68%	27%	72%

Similarly, a CNN poll of Black voters, released on Friday, December 2, 2022, found Mr. Walker winning just three percent of Black voters.”²¹⁸ And when New York Times reporters interviewed more than “more than two dozen Black voters across Georgia, many said they did not see Mr. Walker, who has taken a conciliatory approach to matters of race, as representing the interests of Black people.”²¹⁹ The Times reported that “many Black voters disagree with how Mr. Walker,” quoting Black human resources coordinator, Ms. Darca Davis, “views the nation and also other African American people.”²²⁰

It is undeniable that support in Georgia for the Democratic and Republican parties remains profoundly split by race. The 2022 Senate race between Walker and Warnock—two Black men—produced utterly asymmetrical voting patterns among white and Black voters, demonstrating more clearly than any recent election in Georgia’s history the continued salience of race in Georgia elections and how the two parties are intricately defined by race.

B. Racial Appeals in Georgia Politics

Explicit racial appeals in politics are more taboo today than they were in the mid-20th Century. Nonetheless, implicit or subtle appeals to race are still common and contribute to Georgia’s racial polarization. The success of the Democratic Party in the South relies crucially on engaging and mobilizing Black voters. Consequently, the modern Republican party has made attacking the Black core of the Democratic Party, especially urban areas where most Black voters live, one of its fundamental strategies.

²¹⁸ Maya King, Clyde McGrady, & Jezmine Ulloa, “In Georgia, a Heated Senate Race Stirs Mixed Emotions in Black Voters,” *N.Y. Times* (Dec. 3, 2022), <https://www.nytimes.com/2022/12/03/us/politics/georgia-senate-runoff-black-voters.html>.

²¹⁹ *Id.*

²²⁰ *Id.*

i. Historical Foundations

Republican political operative Lee Atwater from Georgia's neighbor South Carolina had learned from fellow South Carolinian and Nixon Southern strategist Harry Dent. As Atwater, the Republican campaign aide and strategist who helped George H.W. Bush win election in 1988 by helping to create the infamous "Willie Horton" advertisement, notoriously explained in 1981 that when the Republican Party recognized that overt appeals were no longer effective, they shifted to ideas with plainly racial ties: "forced busing, states' rights, and all that stuff."²²¹ These implicit racial appeals communicate the same ideas as explicit racial appeals by alluding to "racial stereotypes or a perceived threat" from racial or ethnic minorities. Atwater was especially candid in his explanation:

You start out in 1954 by saying, "Nigger, nigger, nigger." By 1968 you can't say "nigger"—that hurts you, backfires. So you say stuff like, uh, forced busing, states' rights, and all that stuff, and you're getting so abstract. Now, you're talking about cutting taxes, and all these things you're talking about are totally economic things and a byproduct of them is, blacks get hurt worse than whites.... "We want to cut this," is much more abstract than even the busing thing, uh, and a hell of a lot more abstract than "Nigger, nigger."²²²

Princeton University Political Scientist Tali Mendelberg defined Atwater's implicit racial appeal as "one that contains a recognizable – if subtle – racial reference, most easily through visual references."²²³ Ian Haney Lopez, the Chief Justice Earl Warren Professor of Public Law at Berkeley Law, University of California, described implicit racial appeals as a "*coded* racial appeal," with "one core point of the code being to foster deniability," since the "explicit racial appeal of yesteryear now invites political suicide." One characteristic of implicit racial appeals is that they are usually most successful when their racial subtext goes undetected.²²⁴ Implicit racial

²²¹ Peter Baker, "Bush Made Willie Horton an Issue in 1988, and the Racial Scars Are Still Fresh," N.Y. Times (Dec. 3, 2018), <https://www.nytimes.com/2018/12/03/us/politics/bush-willie-horton.html>; Rick Perlstein, "Exclusive: Lee Atwater's Infamous 1981 Interview on the Southern Strategy," *The Nation* (Nov. 13, 2012), <http://www.thenation.com/article/170841/exclusive-lee-atwaters-infamous-1981-interview-southern-strategy>.

²²² Rick Perlstein, "Exclusive: Lee Atwater's Infamous 1981 Interview on the Southern Strategy," *The Nation* (Nov. 13, 2012), <http://www.thenation.com/article/170841/exclusive-lee-atwaters-infamous-1981-interview-southern-strategy>.

²²³ Tali Mendelberg, *The Race Card: Campaign Strategy, Implicit Messages, and the Norm of Equality* (Princeton, N.J.: Princeton University Press, 2001), 9, 11.

²²⁴ Lopez, *Dog Whistle Politics*, 130, 4.

appeals make use of coded language to activate racial thinking.²²⁵ Racial cues, in the form of code words, such as “welfare queen,” “lazy,” “criminal,” “taking advantage,” “corruption,” “fraud,” “voter fraud,” and “law and order” are racial code words that refer back to Reconstruction era when African Americans were first elected to office. Other coded issues, such as “poverty” and “immigration,” prime racial attitudes among white voters.

Reagan’s 1980 presidential campaign was extremely effective at using subtle racial appeals to win white votes. Indeed, he chose to open that campaign with a state’s rights speech at the Neshoba County Fair in Mississippi, the notorious scene of the murder of three civil rights workers in 1964. His campaign also used racial coded terms such as “welfare queen” and “strapping young buck.”²²⁶ 22% of Democrats ultimately supported Regan in 1980, but those defections were substantially higher among Democrats with racially conservative views.²²⁷ 71% of Democrats who felt “the government should not make any special effort to help [African Americans] because they should help themselves” voted for Reagan.²²⁸

Similarly, in the 1988 campaign, Republican candidate George H.W. Bush associated Democratic candidate Governor Michael Dukakis with Willie Horton, an African American convicted of murder who committed an additional murder and rape when released on a weekend furlough program for prisoners that had been supported by Governor Dukakis. The Bush campaign showed images of Mr. Horton, rendering the racial appeal clear: supporting Dukakis would allow Black murderers to roam the streets. This appeal to the racial fears contributed to Bush’s victory in 1988.²²⁹

Georgia was a focal point of this strategy. Following the leadership of Richard Nixon and the Republican National Committee, the Georgia Republican party insurgence was grounded on

²²⁵ Nicholas A. Valentino, Vincent L. Hutchings, and Ismail K. White. “Cues that Matter: How Political Ads Prime Racial Attitudes During Elections,” *American Political Science Review* 96 (2002), 75-90.

²²⁶ Ian Haney-Lopez, “The Racism at the Heart of the Reagan Presidency,” Salon (Jan. 11, 2014), *available at* https://www.salon.com/2014/01/11/the_racism_at_the_heart_of_the_reagan_presidency/.

²²⁷ *Id.*

²²⁸ *Id.*

²²⁹ Ian Haney Lopez, *Dog Whistle Politics: How Coded Racial Appeals Have Reinvented Racism and Wrecked the Middle Class* (New York: Oxford University Press, 2013) 59, 105-7; Orville Vernon Burton, *Justice Deferred: Race and the Supreme Court* (Cambridge: The Belknap Press of Harvard University Press, 2021), 260, 328.

fiscal conservatism, opposition to integration (particularly busing), and a growing demand among white suburbanites for “law and order.” The rallying cry of “law and order” became a dog whistle for many candidates and voters.²³⁰ And the person who perhaps more than anyone else helped steer the Republican Party to this new form of race baiting was Georgia politician Newt Gingrich, who was first elected to Congress from a suburban Atlanta district in 1978 and became the Republican speaker of the U.S. House of Representatives in 1994.

The title of former Emory University history professor Dan T. Carter’s study of race and politics illustrates the trajectory of race appeals: *From George Wallace to Newt Gingrich: Race in the Conservative Counterrevolution, 1963-1994*.²³¹ For Dr. Carter, Wallace is the key figure in the modern use of code words and racist language. But Gingrich is, in the words of Dana Milbank, the “architect of our [current political] dysfunction.”²³² Gingrich ran against Virginia Shephard, a white Democrat, during his first campaign in 1978. He distributed a flyer showing his opponent in a photo with Black Georgia representative Julian Bond which read:

If you like welfare cheaters, you’ll love Virginia Shephard. In 1976, Virginia Shephard voted to table a bill to cut down on welfare cheaters. People like Mrs. Shephard, who was a welfare worker for five years, and Julian Bond fought together to kill the bill.²³³

One of Gingrich’s campaign aides later said “we went after every rural southern prejudice we could think of.”²³⁴ Gingrich’s first act after being elected to Congress was to call for the expulsion of Democrat Charles Diggs from Detroit, the first Black member of Congress elected from an urban district in Michigan, who had diverted \$6,000 in funds from his congressional payroll for his personal use—even though similar infractions by white legislators had not previously resulted

²³⁰ Matthew D. Lassiter, *The Silent Majority: Suburban Politics in the Sunbelt South* (Princeton, N.J.: Princeton University Press, 2006), 234.

²³¹ Dan T. Carter, *From George Wallace to Newt Gingrich: Race in the Conservative Counterrevolution, 1963-1994* (Baton Rouge: Louisiana State University Press, 1996)

²³² Dana Milbank, *The Destructionists: The Twenty-Five-Year Crack-Up of the Republican Party* (New York: Doubleday, 2022), 49; see also Julian E. Zelizer, *Burning Down the House: Newt Gingrich, The Fall of a Speaker, and the Rise of the New Republican Party* (New York: Penguin, 2020).

²³³ Milbank, *The Destructionists*, 66.

²³⁴ *Id.*

in expulsion. Gingrich led the successful campaign for Representative Diggs' expulsion, though he was subsequently re-elected.²³⁵ According to Dana Milbank:

Gingrich claimed to be racially progressive (he favored a Martin Luther King Jr. federal holiday), but was proficient in racist dog whistles, railing against the “corrupt, liberal welfare state,” drafting a Republican platform in Georgia warning that “America is in danger of decaying into a jungle of violent crimes,” saying that because of civil rights leader Jesse Jackson “it’s going to be a Dukakis-Jackson administration no matter who the vice presidential nominee is.” He argued for branding Democrats with the words “welfare” and “criminal rights.” He claimed that “it is in the interest of the Republican Party...[ellipsis in original] to invent new Black leaders, so to speak—people who have a belief in discipline, hard work, and patriotism. He decried “multicultural nihilistic hedonism.” He fought civil rights groups in trying to add a new category, “multi-cultural to the census. When Gingrich’s Republicans won the House in 1994, it was in large part because for the first time since Reconstruction, Democrats had lost their southern majority in Congress.”²³⁶

Racism, whether dog whistled or communicated directly, became a hallmark of the Gingrich Republican Party. Georgia Republican congressman Bob Barr, in the 1990s addressed the Council of Conservative Citizens, a descendant of the White Citizens Council.²³⁷ Radio commentator Rush Limbaugh said at one point that “if any race of people should not have guilt over slavery, it’s Caucasians.”²³⁸ Gingrich himself remains active in Georgia politics, campaigning for Trump-backed candidates in the 2022 election cycle, opining that Kamala Harris “is the dumbest vice president ever,” while reinforcing stereotypes while challenging them, arguing that Republican African American Senate candidate Herschel Walker “is dramatically smarter than people think he is.”²³⁹

²³⁵ *Id.*

²³⁶ *Id.* at 66–67.

²³⁷ *Id.* at 68.

²³⁸ *Id.*

²³⁹ Shannon McCaffrey, “Back in Georgia, Newt Gingrich looks to make his mark on 2022 election,” *Atlanta Journal Constitution* (May 28, 2022), <https://www.ajc.com/politics/election/back-in-georgia-newt-gingrich-looks-to-make-his-mark-on-2022-election/HFSZFXCZFRDKZB4CLVAJTE427I/>.

ii. Modern Examples

a. 2018 Gubernatorial Race

Racist appeals have continued to characterize Georgia elections and reached a crescendo in 2018 when Stacey Abrams, the Democratic minority leader in the Georgia House of Representatives, challenged Brian Kemp, the Republican Secretary of State, in the 2018 race for Governor. Kemp's efforts and successes to limit Black voting strength by striking voters, especially minority voters from the voting rolls are discussed elsewhere in this report. *See supra* Part IV.I. Kemp justified this disfranchisement by claiming that he was defending the integrity of the vote against "radical leftists," "outside agitators," and "criminal illegals" who were invading the state in large numbers. He claimed that Abrams was encouraging "illegals"—which for Kemp included both documented and undocumented immigrants. He told Georgia voters, echoing Donald Trump, that "we can build a wall—a big, red, beautiful wall—around the state of Georgia to knock that blue wave down."²⁴⁰

Kemp also circulated on social media a photograph of a few members of the New Black Panther Party, considered a hate group by the Southern Poverty Law Center, attending an Abrams rally with guns. Although Abrams condemned the New Black Panther Party, Kemp circulated the photo on Facebook with the accompanying message: "The New Black Panther Party is a virulently racist and antisemitic organization whose leaders have encouraged violence against whites, Jews, and police officers. SHARE if you agree that Abrams and the Black Panthers are TOO EXTREME for Georgia!"²⁴¹ The post spread quickly through right-wing media.²⁴² As one media commentator later noted, "[i]t was too easy for Brian Kemp's last-minute dog whistle about Stacey Abrams to go viral."²⁴³

²⁴⁰ Carol Anderson, *One Person, One Vote: How Voter Suppression is Destroying Our Democracy* (New York: Bloomsbury Publishing, 2020), 173.

²⁴¹ April Glaser, "It Was Too Easy for Brian Kemp's Last-Minute Dog Whistle About Stacey Abrams To Go Viral," *Slate* (Nov. 6, 2018), <https://slate.com/technology/2018/11/brian-kemp-stacey-abrams-dog-whistle-black-panthers-facebook.html>.

²⁴² *See* Penny Starr, *Armed Black Panthers Lobby for Democrat Gubernatorial Candidate Stacey Abrams*, *Breitbart* (Nov. 4, 2018), *available at* https://www.breitbart.com/politics/2018/11/04/armed-black-panthers-lobby-for-democrat-gubernatorial-candidate-stacey-abrams/?utm_source=wnd&utm_medium=wnd&utm_campaign=syndicated.

²⁴³ April Glaser, "It Was Too Easy for Brian Kemp's Last-Minute Dog Whistle About Stacey Abrams To Go Viral," *supra* n.241.

Abrams was attacked with even more overtly racist appeals from third parties. For example, a robo-call created by a fringe right-wing group circulated in the Atlanta suburbs before the election. The speaker in the robo-call imitated Oprah Winfrey and stated:

“This is the magical Negro, Oprah Winfrey, asking you to make my fellow Negro, Stacey Abrams, governor of Georgia. Yes, also the Jews who own the American media saw something in me—the ability to trick dumb white women to think like me. And to do, read, and think what I told them to do.... I see that same potential in Stacey Abrams. Where others see a poor man’s Aunt Jemima, I see someone that white women can be tricked into voting for—especially the fat ones.”²⁴⁴

The FCC later called for a \$12 million fine against the originator of the racist robo-calls.²⁴⁵ As one commentator noted after the 2018 election, “racist appeals didn’t hurt” the candidates making them in Georgia and throughout the South, and actually “did help them.”²⁴⁶

b. 2020 U.S. Senate Race

Racial appeals were also evident in the 2020 U.S. Senate race. Democrats nominated Raphael Warnock, a Black minister preaching from the same pulpit Martin Luther King Jr. once occupied at Ebenezer Baptist Church, attempting to be the first Black senator from the state of Georgia. Warnock faced racist attacks throughout the 2020 campaign, often through “dog whistle” attacks that did not explicitly focus on Warnock’s race as explained above.

Warnock’s opponent in the general election was then-Senator Kelly Loeffler. Loeffler attacked Warnock repeatedly as a “radical liberal” and characterized his sermons delivered at Ebenezer Baptist Church as un-Christian. Congressman Doug Collins, who was defeated by Loeffler defeated in the Republican primary but later supported her in the general election, said that “there is no such thing as a pro-choice pastor. What you have is a lie from the bed of hell. It is time to send *it* back to Ebenezer Baptist Church,” referring to Warnock as an “it” and Ebenezer

²⁴⁴ Madison Feller, “A Racist, Anti-Semitic Robo-Call Targeting Stacey Abrams is Going Out to Georgia Voters,” *Elle* (Nov. 6, 2018), <https://www.elle.com/culture/career-politics/a24662570/robo-call-georgia-voters-targeting-stacey-abrams-racist/>.

²⁴⁵ Mark Niesse, “Racist robocalls attacking Stacey Abrams lead to proposed fines,” *Atlanta Journal Constitution* (Jan. 31, 2020), <https://www.ajc.com/news/state--regional-govt--politics/racist-robocalls-attacking-stacey-abrams-lead-proposed-fines/3gqUT9zGxqKkHCN1XtInVN/>.

²⁴⁶ Jarvis De Berry, “The Dirty South: Racist Appeals Didn’t Hurt Candidates, Did Help Them,” *Nola* (Nov. 17, 2018), https://www.nola.com/opinions/article_2affbc92-aaf4-5c6c-88d6-9fe1db466492.html

Baptist Church as satanic.²⁴⁷ This line of attack crossed a line and exposed the “fragile relationship that Georgia Republicans have maintained with Ebenezer Baptist Church, and by extension, the King family.”²⁴⁸ Loeffler claimed in response that “there is not a racist bone in my body.”²⁴⁹

Leaving the question of her bones aside, Loeffler was supported by a number of prominent racists and white nationalists. She was photographed with Chester Doles, a former “Grand Klaliff” of the Ku Klux Klan in North Georgia and a member of the neo-Nazi National Alliance,²⁵⁰ and did an interview on the One America News Channel with Jack Posobiec, “a TV pundit associated with white supremacy and Nazism.”²⁵¹ Senator Loeffler also received the enthusiastic support of the newly elected congresswoman from North Georgia Marjorie Taylor Green, who had recorded a number of videos which stated, among other things, that Black people’s progress is hindered by African American gang activity, drugs, lack of education, Planned Parenthood, and abortions.²⁵² Warnock also faced blatant racist attacks on the campaign trail. For example, one of his virtual town hall meetings was interrupted by hecklers who were “chanting the N-word” in an attempt to shut down the virtual event.²⁵³

²⁴⁷ Rick Rojas, “Georgia Pastors See Attacks on Black Church in Campaign Against Warnock,” N.Y. Times (Dec. 19, 2020), <https://www.nytimes.com/2020/12/19/us/georgia-pastors-see-attack-on-black-church-in-campaign-against-warnock.html>.

²⁴⁸ Jim Galloway, “Taking Senator Kelly Loeffler to Church,” *Atlanta Journal-Constitution* (Dec. 1, 2020), <https://www.ajc.com/politics/politics-blog/opinion-the-kelly-loeffler-raphael-warnock-runoff-crosses-a-line/Z7YGGZ4MBOFFNJHKBBIJT6SHJM/>.

²⁴⁹ Rick Rojas, “Georgia Pastors See Attacks on Black Church in Campaign Against Warnock,” N.Y. Times, *supra* n.247.

²⁵⁰ “Loeffler campaign: She had ‘no idea’ she posed with neo-Nazi,” Associated Press (Dec. 13, 2020), available at <https://apnews.com/article/race-and-ethnicity-georgia-media-social-media-elections-99c40bece8a6fc6904647727493f1257>.

²⁵¹ Leon Stafford, “Warnock Tests Loeffler’s View That She’s Not Racist,” *Atlanta Journal Constitution* (Dec. 22, 2020), <https://www.ajc.com/politics/senate-watch/campaign-check-warnock-tests-loefflers-view-that-shes-not-racist/SOWX3GL3ARDJNBFDWWZYQ75BVM/>.

²⁵² Ally Mutnick & Melanie Zanora, “House Republican Leaders Condemn GOP Candidate Who Made Racist Videos,” Politico (June 17, 2020), <https://www.politico.com/news/2020/06/17/house-republicans-condemn-gop-candidate-racist-videos-325579>; Greg Bluestein, “QAnon Believer’s Victory a Mixed Blessing for GOP,” *Atlanta Journal Constitution*, Aug. 13, 2020, at A1.

²⁵³ Jason Braverman, “Town Hall with Georgia US Senate Candidate Allegedly Interrupted With Racist Attacks, Pornography,” *11 Alive* (Aug. 25, 2022), <https://www.11alive.com/article/news/politics/elections/virtual-town-hall-with-democratic-us-senate-candidate-hacked-with-racist-attacks-pornography/85-ba6f9c4d-b55f-4465-8a15-5d1d856cd8f7>.

c. 2022 Gubernatorial Race

Racial appeals dominated Stacey Abrams's second run for Governor in 2022. Governor Kemp faced a primary challenge from former Senator David Perdue, who attempted to win over Republican primary voters through racist attacks against Abrams. Perdue said in a televised interview that Abrams was "demeaning her own race" and should "go back where she came from."²⁵⁴ Kemp, who eventually defeated Perdue, repeatedly attacked Abrams in the general election as "upset and mad," evoking the trope and dog whistle of the "angry Black woman."²⁵⁵ Moreover, Kemp's campaign deliberately darkened Abrams's face in campaign advertisements in an effort to create a darker, more menacing image.²⁵⁶

As was true in the 2018 campaign, Abrams faced repeated racist attacks from third parties. After Stacy Abrams planned a campaign rally in Forsythe County, in suburban Atlanta, the Republican Party of Forsythe County issued a digital flyer that was "a 'call to action' encouraging 'conservatives and patriots' to 'save and protect our neighborhoods,'" and accused both Abrams and Senator Warnock of being "designers of destructive socialism" that would be "crossing over our county border."²⁵⁷ The flier carried echoes of the infamous pogrom in Forsythe County in 1912, when most of the Black people in the county were forcibly expelled.²⁵⁸

d. "Voter Fraud" and "Fulton County"

The use of "coded terms" has been a common racial appeal across elections in Georgia. And among "coded terms" in modern politics, probably none has the racial salience of "voter fraud." Although accusations of minority voter fraud were a major theme in the efforts of

²⁵⁴ Ewan Palmer, "David Perdue Doubles Down on 'Racist' Stacey Abrams Remarks in TV Interview," *Newsweek*, (May 24, 2022), <https://www.newsweek.com/david-perdue-racist-stacey-abrams-go-back-georgia-1709429>.

²⁵⁵ Abby Vesoulis, "Did Brian Kemp Employ a Dog Whistle During His Campaign Against Stacey Abrams?," *Mother Jones* (Oct. 18, 2022), <https://www.motherjones.com/politics/2022/10/Georgia-debate-governor-abrams-kemp/>.

²⁵⁶ Doug Richards, "Darkened Skin in Anti-Abrams Ad Racially Charged, 'Pernicious,' Political Analysts Say," *11 Alive* (Sept. 30, 2022), <https://www.11alive.com/article/news/politics/darkened-skin-in-georgia-political-ads-2022/85-3ff31b49-c451-4af8-8033-fd732fe787ae>.

²⁵⁷ Maya King, "In Georgia County With Racist History, Flier Paints Abrams as Invading Enemy," *N.Y. Times* (Sept. 16, 2022), <https://www.nytimes.com/2022/09/16/us/politics/stacey-abrams-forsyth-georgia-republicans.html>.

²⁵⁸ See Patrick Phillips, *Blood at the Root: A Racial Cleansing in America* (New York: Norton, 2016).

conservative whites during and after Reconstruction to restrict and eliminate Black suffrage, the phrase “voter fraud” is a relatively recent addition to America’s toxic racial vocabulary. In the 1960s, the heyday of the civil rights movement, the phrase “voter fraud” appeared precisely twice in the pages of the *New York Times*, and in the four decades from 1960 to 1999 it appeared 185 times. From 2015 through April 2022, the phrase “voter fraud” appeared in the pages of the *New York Times* 1,526 times.²⁵⁹

At the national level, a turning point in the recent history of “voter fraud” accusations was the 2000 presidential election in Florida and its razor-thin margins. Beyond the obvious post-election turmoil related to recounts, 180,000 ballots, close to 3% of the total votes cast, failed to be counted in Florida, and subsequent analysis showed that election officials discarded one in ten votes cast by Black voters as opposed to less than one in fifty votes cast by whites. Various methods used by election officials in counting ambiguous ballots, as well as the purging of allegedly disenfranchised felons, which included many persons eligible to vote, were consequential to the results of the election and in the end, likely cost Democratic presidential candidate Al Gore more than fifty thousand votes.²⁶⁰ The racial disparity in the Florida recount is, in the opinion of historian Allan Lichtman, “the great underreported scandal of the twenty-first century,” as the general public, following news coverage, tended to blame faulty ballot design, the notorious “hanging chads” and butterfly ballots, rather than the systematic disenfranchisement of Black voters.²⁶¹

Underreported it may be, but Republicans learned an important lesson from the Florida fight—claiming that Democratic officials engaged in voter fraud and disenfranchising as many likely Democratic voters as possible can be a valuable tool in creating chaos and winning elections. As voting law expert Richard L. Hasen stated, “before 2000, there were some rumblings about

²⁵⁹ These figures are drawn from the ProQuest data base, “Historical Newspapers: The New York Times” through the end of 2018, and the search feature for the daily *New York Times* from 2019 through 2 April 2022. The term “vote fraud” has an older history, but in recent years it has largely been supplanted, in the *New York Times* and other newspapers, by “voter fraud.” If there is a difference between the two phrases, vote fraud need not be committed by voters—for instance, corrupt officials can either stuff or conveniently lose ballot boxes, or, more recently used advanced technology to manipulate voting totals. “Voter fraud” on the other hand, implies the illegal action is directly taken by voters.

²⁶⁰ Allan J. Lichtman, *The Embattled Vote in America: From the Founding to the Present* 181–186 (2020)

²⁶¹ *Id.*

Democratic voter fraud, but it really wasn't part of the main discourse."²⁶² Afterwards, "the myth that Democratic voter fraud is common, and that it helps Democrats win election, has become part of the Republican orthodoxy."²⁶³ But perhaps more importantly, reference to fraud has become a racial code word for minority and Black voters. Or in the words of Emory University Professor Carol Anderson, the real lesson of 2000 for Republicans was to do whatever it takes to limit the growing demographic presence of racial minorities among voters, that "those who controlled the key levers of the electoral and political machinery could give purges, bureaucratic runarounds, and other types of chicanery the aura of legality," and above all lie about election fraud.²⁶⁴ And lie "often, loudly, boldly, unashamedly, and consistently," until lies "drowned out the truth."²⁶⁵ Those lies have only become noisier and more brazen since 2000.

These parallel historical narratives about election integrity and voter fraud (false tropes from the excuses for overthrowing the interracial democratically elected governments from Reconstruction era), racial dynamics in Georgia, and coded discussions about the interaction between those two ideas all came to a head during the Trump presidency. Accusations of electoral malfeasance was a staple of Donald Trump's campaigns. Following the Iowa caucuses in February 2016, for example, Trump finished second to Texas Senator Ted Cruz. Calling for the caucus results to be nullified and for a new election, he claimed "Ted Cruz didn't win Iowa, he stole it."²⁶⁶

Trump proceeded to regularly assert during campaign appearances that "the election is going to be rigged," and cast aspersions on urban voters.²⁶⁷ He claimed without any evidence that without strict in-person voter ID laws, there will be people who will "vote ten times," and "keep

²⁶² Cited in Ari Rabin-Haut and Media Matters for America, *Lies, Incorporated: The World of Post-Truth Politics* (New York: Anchor Books, 2016), 135.

²⁶³ Jane Meyer, "The Voter Fraud Myth," *The New Yorker* (Oct. 22, 2012), <https://www.newyorker.com/magazine/2012/10/29/the-voter-fraud-myth>.

²⁶⁴ Carol Anderson, *One Person, No Vote: How Voter Suppression is Destroying Our Democracy* (New York: Bloomsbury, 2018), 50.

²⁶⁵ *Id.* at 60–62; Ari Berman, *Give Us the Ballot: The Modern Struggle for Voting Rights in America* (New York: Picador, 2015) 222–224, 226–229; Stacey Abrams, *Our Time is Now: Power, Purpose, and the Fight for a Fair America* (Henry Holt, 2020), 75–76.

²⁶⁶ Amy Tennery, "Trump Accuses Cruz of Stealing Iowa Caucuses Through Fraud," *Reuters* (Feb. 3, 2016), available at <https://www.reuters.com/article/us-usa-election-trump-cruz/trump-accuses-cruz-of-stealing-iowa-caucuses-through-fraud-idUSMTZSAPEC23ZBL9YS>.

²⁶⁷ Jonathan Blitzer, "Trump and the Truth: The 'Rigged' Election," *The New Yorkers* (Oct. 8, 2016), available at <https://www.newyorker.com/news/news-desk/trump-and-the-truth-the-rigged-election>.

voting and voting and voting.”²⁶⁸ He also suggested that voter fraud would come from cities with large African American and minority populations. In October 2016, for example, candidate Trump said that “voter fraud is all too common, take a look at Philadelphia, what’s been going on, take a look at Chicago, take a look at St. Louis,” and said what was happening in those cities was “horrendous.”²⁶⁹ That fall, Trump told an almost all-white crowd outside Pittsburgh that it was “so important that you watch other communities, because we won’t have this election stolen from us.”²⁷⁰ He also complained that undocumented immigrants, most of whom were persons of color, would be used to defraud the election, and that President Obama was “letting people pour into the country so they can vote.”²⁷¹

Donald Trump later brought these racial appeals to Georgia by using references to “Fulton County” as coded language. As part of his effort to overturn the 2020 election results in Georgia, Trump called Georgia Secretary of State Brad Raffensperger and told him that “political corruption” in Fulton County was “rampant” and that many Republican votes in Fulton County were shredded, along with other baseless conspiracy theories.²⁷² Trump’s campaign later attacked two Black poll workers in Fulton County: Ruby Freeman and her daughter Shaye Moss. In his testimony before the Georgia Senate, Rudy Giuliani showed a video which purported to show Freeman and Moss engaging in “surreptitious illegal activities” akin to “drug dealers” who were “passing out dope,” reflecting old racist tropes about persons of color.²⁷³ Although the accusations were utter nonsense, former President Trump told Secretary Raffensperger that Ruby Freeman was a “professional vote scammer and hustler.”²⁷⁴ The two women received harassing phone calls and death threats, often laced with racial slurs, frightening nighttime knocks on their doors—they had to leave their residence and go into hiding—along with suggestions that they should be “strung up

²⁶⁸ *Id.*

²⁶⁹ *Id.*

²⁷⁰ *Id.*

²⁷¹ *Id.*

²⁷² Quinn Scanlan, “Trump ‘Just Plain Wrong’ on Fraud Claims: Georgia Secretary of State Raffensperger,” ABC News (Jan. 4, 2021), *available at* <https://abcnews.go.com/Politics/trump-plain-wrong-fraud-claims-georgia-secretary-state/story?id=75032595>.

²⁷³ Jason Szep and Linda So, “Trump Campaign Demonized Two Georgia Election Workers—And Death Threats Followed,” Reuters, (Dec. 1 2021),

<https://www.reuters.com/investigates/special-report/usa-election-threats-georgia/> (emphasis added).

²⁷⁴ *Id.*

from the nearest lamppost and set on fire,” horribly echoing the calls for lynchings of Black citizens from earlier years who were attempting to participate in the political process²⁷⁵ As discussed above, the intense focus on Fulton County is not random—reference to this large, urban, majority-minority county in Georgia has been used as a coded racial appeal in the election context.

The drumbeat of allegations against the “integrity” of Georgia’s electoral processes, especially as practiced in the interracial county governments in the Atlanta metro area, has continued. In August 2021, Republican Congressman Jody Hice, who challenged Raffensperger in the Republican primary in the race for Secretary of State, stated that “as long as *these people* are allowed to continue cheating, they will continue to do so.” Kemp claimed that “Fulton County has a long history of mismanagement, incompetence, and lack of transparency when it comes to running elections, including during the 2020 elections.” Butch Miller, a candidate for lieutenant-governor argued that “maintaining integrity of our elections is of the utmost importance to me and my colleagues in the state senate. Unfortunately, Fulton County’s apparent disregard for election procedures and state law have called that integrity into doubt.”²⁷⁶

C. Divergent Race-Related Views of Members of the Democratic and Republican Parties in Georgia

Aside from the use and effect of racial appeals in Georgia, the significant impact race has on the state’s partisan divides is made readily apparent when one considers the opposing positions that members of Georgia’s Democratic and Republican parties take on issues inextricably linked to race. For example, the Democratic and Republican members of Georgia’s congressional delegation consistently oppose one another on issues relating to civil rights. As indicated in the table below, each Republican member of the delegation during the 2017-2019 congressional session received extremely low scores (no higher than 6-13% on a scale of 0-100%) on the civil rights scorecard produced by the NAACP, an organization dedicated to promoting minority rights. Meanwhile, each Democratic member received extremely high scores (81-100%).

²⁷⁵ *Id.*

²⁷⁶ Mark Niese, “Board Launches Fulton County Election Woes Inquiry,” *Atlanta Journal Constitution* (Aug. 19, 2021), <https://www.ajc.com/politics/panel-appointed-to-investigate-fulton-election-problems/IBRJTD4ERAP7HRIFZ7D243JAA/>.

Pro-Civil Rights Votes Among Georgia's Congressional Delegation, 2017-2019 Congressional Session ²⁷⁷			
Republican Members		Democratic Members	
Johnny Isakson	13%	Sanford Bishop Jr.	81%
David Perdue	9%	Hank Johnson	100%
Earl "Buddy" Carter	6%	John Lewis	97%
Drew Ferguson	13%	David Scott	84%
Rob Woodall	9%		
Austin Scott	13%		
Doug Collins	6%		
Jody B. Hice	6%		
Barry Loudermilk	6%		
Rick W. Allen	9%		
Tom Graves	9%		

The Pew Research Center's *Beyond Red and Blue: The Political Typology* (issued in November 2021) confirm these differences between the parties on issues relating to race. This study divided political allegiance into nine distinct typology groups, four leaning Republican, four leaning Democratic, with the "Stressed Sideliners," uncertain and generally not following politics very closely.²⁷⁸ Among the four Republican groupings [Faith and Flag Conservatives (85% white), Committed Conservatives (82% white), Populist Right (85% white), and Ambivalent Right (65% white)], the survey found "no more than about a quarter say a lot more has to be done to ensure equal rights for all Americans regardless of their racial or ethnic backgrounds, by comparison, no fewer than about three-quarters of any Democratic group [Progressive Left (68% white), Establishment Liberals (51% white), Democratic Mainstays 46% white), and Outsider Left (49% white) says a lot more needs to be done to achieve this goal."²⁷⁹ The four Republican groups agreed between 78 and 94% that "white people do not benefit much or not at all from the advantage that Black people do not have," or in other words, that there is no systematic racism at work in American society or institutions.²⁸⁰ Among the four Democratic leaning groups, there was

²⁷⁷ Nat'l Ass'n for the Advancement of Colored People, "NAACP Civil Rights Federal Legislative Report Card, Congressional Votes 2017-2018" (Feb. 1, 2019), <https://naacp.org/sites/default/files/documents/115th-Final-Report-Card.pdf>.

²⁷⁸ Pew Research Center, *Beyond Red and Blue: The Political Typology*, (Nov. 9, 2021), <https://www.pewresearch.org/politics/2021/11/09/beyond-red-vs-blue-the-political-typology-2/>.

²⁷⁹ *Id.* at 7.

²⁸⁰ *Id.* at 14.

agreement (between 73 and 96%) that “a lot more needs to be done to ensure equal rights for all Americans regardless of their ethnic or racial backgrounds.”²⁸¹

Georgia-specific polls suggest the same. An NORC poll conducted for 3,291 likely Georgia voters just before the 2020 election found that 45% were Democratic or Democratic leaning, 51% Republican or Republican leaning. Among voters who believed that racism was the most important issue facing the country, 78% voted for Joe Biden and 20% voted for Donald Trump. Among voters who believed that racism was “not too or not at all serious,” 9% voted for Biden and 90% voted for Trump. And among voters who believe that racism is a serious problem in policing, 65% voted for Biden and 33% voted for Trump.²⁸²

C. Conclusion

As this report has shown, Georgia has worked for decades to diminish the voting power of Black Georgians, both at the structural electoral level (in terms of redistricting and electoral arrangements), and at the individual level (in terms of voter requirements). These efforts have often been successful, stymying Georgia’s Black voters from exercising their full political power. It is my opinion that Georgia’s newest congressional plan is best viewed with this historical context.

Moreover, the correlation between race and party in Georgia is no coincidence. Instead, race and issues inextricably linked to race have long played a role in separating Black voters and white voters along partisan lines, and they continue to contribute to the partisan divisions we see today.

APPENDIX A: Representative Discriminatory Voting Tactics

Voting Mechanism Adoption	Name of Georgia Jurisdiction	Details
Majority voting requirement	Americus (city)	Adopted plurality to majority vote for mayor and city council in 1968

²⁸¹ *Id.* at 29

²⁸² A.P. VoteCast, “Georgia Voter Surveys: How Different Groups Voted,” N.Y. Times, (Nov. 3 2020), <https://www.nytimes.com/interactive/2020/11/03/us/elections/ap-polls-georgia.html>.

	Jackson (city)	Adopted majority vote after passage of VRA, enjoined in 1981
	Covington (city)	Adopted a majority vote and runoff election requirement for city council in 1967
	St. Mary's (city)	Adopted majority vote requirement for city council in 1967
	Waynesboro (city)	Adopted a majority vote requirement in 1971, ignored §5 finding against the city until 1976
	Moultrie (city)	Adopted majority vote requirement for city council in 1965; used at-large elections
	Augusta, Alapaha, Ashburn, Athens, Butler, Cairo, Camilla, Crawfordville, East Dublin, Hartwell, Hinesville, Hogansville, Jesup, Jonesboro, Lakeland, Louisville, Lumber City, Madison, Nashville, Newman, Palmetto, Sandersville, Sylvester, Thomson, Wadley, Waynesboro, Wrens	Other cities in Georgia that adopted majority vote requirements after 1970
At-Large Voting	Dooley County	Utilized at-large voting from 1967 to 1981
	Miller County	Utilized at-large voting from 1967 to 1980
	Pike County	Utilized at-large voting from 1967 to 1980. No preclearance

		was sought. In 1979, the US AG said preclearance was necessary, but county refused to honor this until a subsequent lawsuit in 1980.
	Harris County	Utilized at-large voting for board of commissioners starting in 1974
	Sumter County	Utilized at-large voting for county commissioners in 1972 following Section 5 finding that the county was malapportioned. In 1981 a three-judge federal panel found that this required preclearance.
	Jackson (city)	Utilized at-large voting following passage of Voting Rights Act; Annexed several dozen areas to suppress Black voting; enjoined by federal court in 1981
	Burke County	Utilized at-large voting until 1976, until enjoined by a federal court in 1981
	Putnam County	Utilized at-large voting until 1981
	McDuffie County	Utilized at-large voting until a 1978 consent decree .
	Coffee County	Utilized at-large voting until a 1977 consent decree .

	Douglas County	Utilized at-large voting until a 1977 consent decree.
	Peach County	Utilized at-large voting until a 1979 consent decree .
	Waynesboro (city)	Utilized at-large voting until a 1977 consent decree.
	Americus (city)	Utilized at-large voting until a 1980 consent decree.
	Dawson County	Utilized at-large voting until a 1980 consent decree.
	Madison County	Utilized at-large voting until a 1978 consent decree.
	Morgan, Newton, and Twiggs Counties	Adopted at-large voting in 1971
	Wilkes, McDuffie Counties	Adopted at-large voting in 1972
	Newton and Bibb Counties	Adopted at-large voting for Board of Education in 1971
	Baldwin, Truetlen, McDuffie, Camden, Putnam, Pike, Spalding, and Wilkes Counties	Adopted at-large voting for Board of Education in 1972
	Toombs, Sumter, and Clarke Counties	Adopted at-large voting for Board of Education in 1973
	Harris, Charlton, and Taylor Counties	Adopted at-large voting for Board of Education in 1975
	Long County	Adopted at-large voting for Board of Education in 1975
Numbered Post System	Dawson (city)	Adopted numbered-post system in 1970
	Kingsland (city)	Adopted numbered-post system in 1967

Other tactics	DeKalb County	Limited minority voting registration drives in 1980
	Seminole County	Used voting districts drawn in 1933 (which severely diluted Black voting strength) up until 1980.
	Camden County	Designated an all-white women's club as the new municipal polling place in 1978
	Peach County	Adopted staggered voting for County Commissioners in 1968
	Moultrie (city)	Instituted a literacy test for new Black poll workers but grandfathering in all previously serving all-white poll workers in 1978.

Source: Laughlin McDonald, *Voting Rights in the South: Ten Years of Challenging Continuing Discrimination Against Minorities* (ACLU, Southern Regional Office, 1982); Laughlin McDonald, *A Voting Rights Odyssey: Black Enfranchisement in Georgia* (Cambridge: Cambridge University Press, 2003), 141–143.

ORVILLE VERNON BURTON

History Department, 126 Hardin Hall, 403 Calhoun Drive, Clemson University, Clemson, SC
29634-0527; O: 864/656-3153 C: 217/649-0608; Fax: 864/656-1015; H: 864/543-2552
Home: 107 Baywood Circle, Ninety Six, SC 29666 or 110 Houston St., Clemson, SC 29631
vburton@clemson.edu

(<http://justice-deferred.clemson.edu>) (<https://ageoflincoln.wpengine.com>)

Education: 1976, Ph.D. Princeton University Ph.D. dissertation: "Ungrateful Servants?
Edgefield's Black Reconstruction: Part I of the Total History of Edgefield County, South
Carolina." Advisors Sheldon Hackney and James McPherson
1969, B.A. Furman University, magnum cum laude

Military Service: active service 1969, 1974 U.S. Army, Honorably Discharged as Captain, 1977

Academic Positions:

Clemson University, 2010-

The Judge Matthew J. Perry Distinguished Professor of History, 2017-

Professor Sociology and Anthropology, Clemson University, 2014-

Creativity Chair of Humanities, Clemson University, 2013-15

Professor Pan-African Studies, 2012-

Professor Computer Science, Clemson University, 2011-

Director Clemson CyberInstitute, 2010-16

Associate Director Humanities, Arts, and Social Sciences, Clemson CyberInstitute, 2010

Professor of History, Clemson University, 2010-

Burroughs Distinguished Prof. Southern Hist. & Culture, Coastal Carolina University, 2008-10
University of Illinois at Urbana-Champaign (UIUC), 1974-2008

2009- Chair, Advisory Board for Institute for Computing in Humanities, Arts, and
Social Science (I-CHASS)

2008-11, Consultant for Humanities to Chancellor's and Provost's Office

2004-09, Founding Director I-CHASS

2008 - Emeritus University Distinguished Teacher/Scholar, University Scholar, and
Professor History, African American Studies, and Sociology

2006-08, Professor African American Studies

1989-2008, Professor History

1989-2008, Professor Sociology

1988-2008, Graduate College Statistics Faculty

1986-2008, Campus Honors Program

1985-2006, Faculty Affiliate, African American Studies and Research Program

1982-1989, Associate Professor, History

1976-1982, Assistant Professor History

1974-1976, Instructor

National Center for Supercomputing Applications (NCSA)

2002-10, Associate Director, Humanities and Social Sciences

1993-2002, Head, Initiative for Social Sciences and Humanities

1986- Senior Research Scientist

Princeton University

1972-74, Assistant Master, Woodrow Wilson Residential College

1971-72, Instructor, Mercer County Community College, NJ

College of Charleston

2001-, Executive Director, Program in the Carolina Lowcountry and the Atlantic World (CLAW) <http://claw.cofc.edu>

1987, Professor of History, Governor's School of South Carolina

Selected Honors, Fellowships, Awards

The John Hope Franklin Lifetime Achievement Award of the Southern Historical Association, 2022

Induction into the Martin Luther King Jr. Collegium of Scholars at Morehouse College, 2022

Benjamin E. Mays Legacy Award, 2021-

South Carolina Governor's Award for Lifetime Achievement in the Humanities, presented by the SC Humanities Council, 2017

Illinois House Resolution of Congratulations, HR 0711, 2007. The Illinois State legislature passed a special resolution acknowledging my contributions as a scholar, teacher, and citizen of Illinois.

U.S. Professor of the Year, Outstanding Research and Doctoral Universities Professor (Council for Advancement and Support of Education and Carnegie Foundation for the Advancement of Teaching), 1999

American Historical Association Eugene Asher Distinguished Teaching Prize, 2004

Chicago *Tribune's* Heartland 2007 Literary award for nonfiction for *The Age of Lincoln*

Society of American Historians, Elected 2012-

Fellow, National Humanities Center (NEH Senior Scholar Award), 1994-95

Fellow, Woodrow Wilson International Center for Scholars, 1988-89

Fellow, Pew Foundation, 1996

National Fellowship Program for Carnegie Scholars, 2000-2002

Rockefeller Humanities Fellowship, 1978

American Council of Learned Society Fellowship, 1978

Earl and Edna Stice Lectureship in the Social Sciences at the University of Washington, 2005

Strickland Visiting Scholar, Department of History, Middle Tennessee State University, 2006

Pew-Lilly Foundation Graduate Professor, Notre Dame University, 2001

Mark W. Clark Distinguished Chair of History, The Citadel, 2000-01

Elected to honorary life membership in British American Nineteenth-Century Historians

Organization of American Historians Distinguished Lecturer, 2004-

Choice Outstanding Academic Book for, "*Toward the Meeting of the Waters*": *Currents in the Civil Rights Movement in South Carolina during the Twentieth Century*, 2009

Choice Outstanding Academic Book for *The Age of Lincoln*, 2008

Choice Outstanding Academic Title for *Slavery and Anti-Slavery: Transnational Archive*, 2009

Booklist's Editors' Choice Title for *Slavery and Anti-Slavery: A Transnational Archive*, 2009

Choice Outstanding Academic Book for *Computing in the Social Sciences and Humanities*, 2003

Richard F. Fenno Prize, Legislative Studies Section, American Political Science Association, for *Quiet Revolution*, 1995

President Southern Historical Association, 2011-12

President Agricultural History Society, 2001-02

Elected to the South Carolina Academy of Authors, 2016-

Certificate of Excellence from the Carnegie Academy for the Scholarship of Teaching and Learning for Work that Advances the Practice and Profession of Teaching In Support of Significant Student Learning, 2001

Burton, page 3

H-Net received the James Harvey Robinson Prize for teaching from the American Historical Association, 1997 (I was one of the founders, and the first treasurer).
 Award of Distinction in the Film/Video-History/Biography category from the International Academy of the Visual Arts, 16th Annual Communicator Awards, for “People: A Lincoln Portrait” television interstitial series (The Communicator Awards is the leading international awards program honoring creative excellence for communications professionals), 2010 (part of program I put together for Lincoln commemoration at UIUC).
 SC African American Heritage Commission's 2009 “Preserving Our Places in History” Project Award for Claw’s (Executive Director, College of Charleston Carolina Lowcountry and Atlantic World) work in commemorating the banning of the international slave trade
 Florida Historical Society, Medallion Lecture, 2002
 Auburn University, Eminence in the Arts and Humanities Fellows Lectures Medallion, “awarded to persons of distinguished achievement in the arts and humanities: writers, artists or renowned scholars in one or more of the liberal arts disciplines,” 2012
 Senior Research Fellow, Southern Studies, University of South Carolina, 1988
 Phi Beta Kappa, Furman University, 1986-
 Princeton University Scholar Award, 1969
 National Defense Educational Award Title IV Fellowship, 1971 (Princeton University)
 Clark Foundation Scholarship, 1966-69 (Furman University)
 Wicker Award for Outstanding Student (sophomore), Furman University, 1967
 Endel History Award, Furman, 1969
 Bradshaw-Feaster General Excellence Award (Furman’s highest honor for the graduating senior selected by faculty), 1969
 College of Charleston Program in the Carolina Lowcountry and the Atlantic World (CLAW), <http://claw.cofc.edu> named the award given for the best Research Paper presented at the annual conference, the “Professor Vernon Burton award,” 2022-
 The Benjamin E. Mays Historical site in Greenwood, South Carolina, has designated the new research library that is being built, “The Professor Vernon Burton Library”

Honors Clemson University and Recognition

Clemson University Alumni Award for Outstanding Achievements in Research
 Inaugural Class University Research Scholarship and Artistic Achievement Award, 2018
 Inaugural Judge Matthew J. Perry Distinguished Chair of History, 2017-
 College Architecture, Arts, and Humanities (CAAH), Dean’s Award for “Outstanding Service,” 2019
 CAAH, Dean’s Award for “Excellence in Research,” 2016
 CAAH, Creativity Professor Humanities, 2013-15
 Featured Clemson Homepage 2017, “Meet a Tiger,” <http://newsstand.clemson.edu/meet-a-tiger-vernon-burton>

UIUC Honors and Teaching Awards and Recognition

Inaugural University “Distinguished Teacher/Scholar,” 1999-2008
 University Scholar, 1988 – 2008
 Campus Award for Excellence in Public Engagement, 2006
 Graduate College Outstanding Mentoring award, 2001-02
 Fellow, Center for Advanced Study, 1982, Associate, 1994 and 1996
 Burlington Northern Faculty Achievement Award (UIUC), 1986
 Study in a Second Discipline, Statistics and Demography, 1984

Burton, page 4

All-Campus Award for Excellence in Undergraduate Teaching, 1999

LAS Dean's Award for Excellence in Undergraduate Teaching, 1999

LAS Award for Distinguished Teaching, 1986

School of Humanities Teaching Award, 1986

George and Gladys Queen Excellence in Teaching Award in History, 1986

Undergraduate Instructional Award (UIUC), 1984

Every semester and for every undergraduate course that I taught at the University of Illinois (excluding large survey classes of between 300-750 students), I was deemed excellent in the UIUC "Incomplete List of Excellent Teachers." I was noted on the list for more than twenty different courses. I was noted as "outstanding" from 1979 as long as they used that designation.

Recognized by the Pan-Hellenic Council at as the "outstanding staff member for furthering scholastic achievement"

Selected by History Department as the "one instructor whom you believe best at creating intellectual excitement in students" for an educational study of teaching practices of college teachers, 1978

Received the Resident Hall Association Award for the Best Educational Program for lectures/discussion on *Gone With the Wind* and *Jubilee* for Black History Month, 1996

The Honor Society of Phi Kappa Phi, UIUC, Vice President, 2002-03; President, 2003-04

Ronald E. McNair Scholars Program Dedicated Service Award for service to Minority Students, 1996

Associate Vice Chancellor Academic Affairs award for contributions to the Student Research Opportunities Program and work with minority students (1995, 2006)

Publications:

Books:

Justice Deferred: Race and the Supreme Court. Cambridge: Belknap Press of Harvard University Press, 2021. Coauthor Armand Derfner. The Social Science History Association featured a session on the book at their annual meeting in November 2021 and the Midwestern Political Science Association (MPSA) at annual meeting in the April 2022, and at the Association for the Study of African American Life and History (ASALH) September 2022. Panels and sessions are scheduled at the annual conference meetings for the American Historical Association (AHA- January 2023), and the Organization of American Historians (March 2023).

Fort Sumter and Fort Moultrie National Historical Park, Charleston, SC Administrative History. Washington, DC: The National Park Service, November 2020 available 2021, with et al.

Penn Center: A History Preserved. Athens: University of Georgia Press, 2014; paperback edition, 2017.

The Age of Lincoln. NY: Hill and Wang, 2007. (Audio: Blackstone Audio Books). Paperback edition 2008. Selection for Book of the Month Club, History Book Club, Military Book Club. *The Age of Lincoln* was nominated by Farrar, Straus, and Giroux for the Pulitzer Prize. Three historical associations featured sessions on the book, Association for the Study of African American Life and History, 2008; Social Science History Association, 2008; The Southern Intellectual History Circle, 2009.

"*The Free Flag of Cuba*": *The Lost Novel of Lucy Pickens* [orig. pub. 1854] in the Library of Southern Civilization series, edited by Lewis P. Simpson. (Introduction pp. 1-48 and annotated with Georganne B. Burton,) Baton Rouge: Louisiana State University Press, 2002. Paperback 2003.

"*A Gentleman and an Officer*": *A Military and Social History of James B. Griffin's Civil War*. NY: Oxford University Press, 1996; second printing 1999 coauthor Judy McArthur.

Burton, page 5

- In My Father's House Are Many Mansions: Family and Community in Edgefield, South Carolina*. Chapel Hill: University of North Carolina Press, 1985. Paperback edition 1987; 5th printing 1998. *In My Father's House* was nominated by the University of North Carolina Press for the Pulitzer Prize. Two Historical Associations featured this book in sessions at their annual meetings: Social Science History Association, 1986; Southern Historical Association, 1987.
- Editor, *Lincoln's Unfinished Work: The New Birth of Freedom from Generation to Generation*. Baton Rouge: Louisiana State University Press, 2022, with Peter Eisenstadt.
- Editor, *Becoming Southern Writers: Essays in Honor of Charles Joyner*. Columbia: University of South Carolina Press, 2016.
- Editor, *Dixie Redux: Essays in Honor of F. Sheldon Hackney*. Montgomery, AL: New South Books, 2013, with Ray Arsenault.
- Editor, *The Struggle for Equality: Essays on Sectional Conflict, the Civil War, and the Long Reconstruction in Honor of James M. McPherson*. Charlottesville: University of Virginia Press, 2011, with et al.
- Editor, *The Essential Lincoln*. NY: Hill and Wang, 2009.
- Editor, *Remembering Brown at Fifty: The University of Illinois Commemorates Brown v. Board of Education*. Urbana: University of Illinois Press, 2009, E-book 2021, with David O'Brien.
- Editor, "Toward the Meeting of the Waters": *Currents in the Civil Rights Movement in South Carolina during the Twentieth Century*. Columbia: The University of South Carolina Press, 2008. Paperback 2011, E-book 2022, with Winfred B. Moore, Jr.
- Editor, *Slavery in America: Gale Library of Daily Life*, 2 vols. NY, Detroit: Gale Cengage Learning, 2008.
- Editor, *Computing in the Social Sciences and Humanities*. Urbana: University of Illinois Press, 2002.
- Editor, *Wayfarer: Charting Advances in Social Science and Humanities Computing*. Urbana: University of Illinois Press, 2002, with David Herr and Terence Finnegan. This CD-ROM contains more than 65 essays and research and teaching applications, including illustrative interactive multimedia materials.
- Editor, *Documents Collection America's History*, vol. 1, to accompany James Henretta, et al., *America's History*, 2nd ed. NY: Worth Publishers, 1993.
- Editor, *Class, Conflict, and Consensus: Antebellum Southern Community Studies*. Westport, Conn: Greenwood Press, 1982, with Robert C. McMath, Jr.
- Editor, *Toward a New South? Studies in Post-Civil War Southern Communities*. Westport, Conn: Greenwood Press, 1982, with Robert C. McMath, Jr.
- In Press:
Reconstruction at 150: Reassessing the Revolutionary "New Birth of Freedom". Charlottesville: University of Virginia Press, expected 2023 with Brent Morris.
- Promised, but not Finished:
Air Conditioning and the Voting Rights Act: The Voting Rights Act of 1965 in Historical Perspective. Stice Lectures University of Washington. Seattle: University of Washington Press contracted, (withdrawn from press to include the 2013 Shelby County challenge to Sections 5, which ended preclearance in 2013, and the in-person Voter Id controversies, partisan redistricting challenges, and 2021 *Bronovich* challenge to Section 2).
- Lincoln and the South Revisited*. Under contract. Carbondale: University of Southern Illinois Press.

Burton, page 6

The South as Other: The Southerner as Stranger—The Contradictions of Southern Identity. The expansion of my presidential address for the Southern Historical Association. Promised to University of South Carolina Press.

Plays: “Abraham Lincoln’s Beardstown Trial: The Play” with Georganne B. Burton Premiered Sept. 29, 2009, Beardstown, IL. (Commissioned by Civil War Trust; Endorsed by the Congressional Abraham Lincoln Bicentennial Commission, November 2009; Play available upon request); <http://www.lincolnbicentennial.gov/calendar/beardstown-trial-11-10-09.aspx>; <http://www.civilwar.org/aboutus/events/grand-review/2009/almanac-trial.html>

Editor, Book Series, *A Nation Divided: Studies in the Civil War Era Series*, University of Virginia Press, 2011-

Editor, Book Series, *The American South Series*, University of Virginia Press, 2013-

Introductions and Forewords to Books:

“Foreword,” pp. ix-liv to *Born to Rebel: An Autobiography* by Benjamin Elijah Mays. Athens: University of Georgia Press Brown Thrasher edition, 1987, also in paperback edition (book without foreword originally published by Charles Scribner's Sons, 1971). Revd. Foreword 2003.

“Introduction,” pp. 9-11 to *Roll the Union On: Southern Tenant Farmers Union*. As told by its Co-founder, H.L. Mitchell. Chicago: Charles H. Kerr Publishing Company, 1987.

“Introduction,” pp. xiii-xviii to *Soldiering with Sherman: The Civil War Letters of George F. Cram*. Jennifer Cain Bohrnstedt, ed., DeKalb: Northern Illinois University Press, 2000.

“Introduction,” pp. x-xxxiv to *Pitchfork Ben Tillman: South Carolinian* by Francis Butler Simkins, for the reprint edition of the Southern Classics Series of the Institute for Southern Studies. Columbia: University of South Carolina Press, 2002 (book without Introduction originally published by Louisiana State University Press, 1944).

“Foreword,” pp. xi-xxv to paperback edition of *Cause at Heart: A Former Communist Remembers* by Junius Irving Scales with Richard Nickson. Athens: University of Georgia Press, 2005, with James Barrett.(book without Foreword originally published 1987).

“Foreword,” pp. vii-xi to *Recovering the Piedmont Past: Unexplored Moments in Nineteenth-Century Upcountry South Carolina History*, edited by Timothy P. Grady and Melissa Walker. Columbia: University of South Carolina Press, 2013.

“Foreword,” pp. vii-xiii to *Our Ancestors – Our Stories: The Memory Keepers*, edited by Harris Bailey, et al. Suwanee, Georgia: The Write Image, 2014.

“Foreword,” pp. iv-xiv, to Kevin M. Cherry, *Virtue of Cain, Biography of Lawrence Cain* Washington: *From Slave to Senator*: Takoma Park, MD: Rocky Pond Press, 2019.

“Foreword,” pp. vi-x, to Frankie Felder, *OURstory Unchained and Liberated from HIStory*. Anderson, S.C.: Edelweiss Publishers, 2021.

“Foreword” to paperback edition of W. J. Megginson, *African American Life in South Carolina’s Upper Piedmont, 1780–1900*. Columbia: University of South Carolina Press, [orig 2006] 2022.

In Press: Critical Introduction to I. A. Newby, *Black Carolinians: A History of Blacks in South Carolina from 1895 to 1868*, 50th Anniversary Edition (Columbia: University of South Carolina Press, [orig 1973] 2023, with Michael LeMahieu.

Journals Edited:

- Editor, Special issue on the “Digital South,” *Southern Quarterly: A Journal of Arts and Letters in the South*, 58: 1-2 (expected soon, Fall 2020/Winter 2021).
- Editor, “Three Articles from a Century of Excellence: The Best of *The South Carolina Historical Magazine*,” pp. 182-89 for *South Carolina History Magazine* 101: 3 (July 2000).
- Editor, “Introduction,” pp. 161-65 for *Social Science Computer Review* 12:2 (Summer 1994).
- Editor, “Technology and Education,” *International Journal of Social Education* 5:1 (Spring 1990).

Sample Articles:

- “The South as Other, The Southerner as Stranger,” Presidential address for the SoutherHistorical Association, *The Journal of Southern History* LXXIX:1 (February 2013): 7-50.
- “Reaping What We Sow: Community and Rural History,” Presidential address for the Agricultural History Society in *Agricultural History* (Fall 2002): 631-58.
- “Building the Transcontinental Railroad,” *Presidential Inaugural Portfolio*, Joint Congressional Committee on Inaugural Ceremonies, January 21, 2013.
- “American Digital History,” *Social Science Computer Review* 23: 2 (Summer 2005): 206-220, reprinted in “Essays on History and New Media,” Roy Rosenzweig Center for History and New Media, at <http://chnm.gmu.edu/essays-on-his-new-media/essays/?essayid=30>. published in a Turkish translation, “AMERİKAN DİJİTAL TARİHİ,” *Tuhead* (Turkish History Educational Journal) [Year 2018, Volume 7, Issue 2](http://dergipark.gov.tr/tuhead/issue/39129/448606), Pages 697 – 719 (<http://dergipark.gov.tr/tuhead/issue/39129/448606>).
- “American Slavery Historiography,” *The Journal of Modern Slavery: A Multidisciplinary Exploration* 7:4 (2022); also published in book, pp. 43-97, *Slavery and its Consequences: Racism, Inequity & Exclusion in the USA*. Edited by Lawrence Edward Carter, Sr., Jodi L. Henderson, and Tina Davis. Atlanta: SlaveFree Today, Inc., 2022
- “Following Autoimmune Diseases Through Patient Interactive Diaries: Continuous Quality Improvement.” *Practical Dermatology* 2017; 14 (12) 48-54, with Updyke KM, Urso B, Ali H, Brooks I, Dellavalle RP, Solomon JA.
- “Stranger in a Strange Land: Crossing Boundaries,” pp. 256-283 in *Shapers of Southern History: Autobiographical Essays by Fifteen Historians*. Edited by John Boles. (Athens: University of Georgia Press, 2004).
- “Cyberinfrastructure for the Humanities, Arts, and Social Sciences,” in *ECAR (Educause Center for Applied Research) Bulletin* 9: 1 (January 13, 2009): 2-11, with Simon Appleford.
- “Race and Reconstruction: Edgefield County, South Carolina,” *Journal of Social History* 12 (Fall 1978): 31-56. Referenced and summarized in *Sociological Abstracts* 12, #1 (April 1978): 45. Reprinted in *The Southern Common People: Studies in Nineteenth Century Social History*. Edited by Edward Magdol and Jon L. Wakelyn, pp. 221-37. (Westport, Conn: Greenwood Press, 1980). Reprinted pp. 87-112 in *The Politics of Freedom: African Americans and the Political Process During Reconstruction*, vol. 5 of *African American Life in the Post-Emancipation South 1861-1900*. Edited by Donald G. Nieman. (Hamden, CT: Garland Publishing, 1994).
- “The Development of Tenantry and the Post-Bellum Afro-American Social Structure in Edgefield County, South Carolina.” In *Presentations Paysannes, Dimes, Rente fonciere et Mouvement de la Production Agricole a l'epoque Preindustrielle: Actes du Colloque preparatoire* (30 juin-let et 2 juillet 1977) au VIIe Congres international d'Histoire economique Section A3. Edimbourg 13-19 aout 1978, Vol. 2: 762-78. Edited by E.

Burton, page 8

LeRoy Ladurie and J. Goy. Paris: Editions De L'Ecole des Hautes Etudes En Sciences Sociales, 1982. Reprinted pp.19-35 in *From Slavery to Sharecropping: White Land and Black Labor in the Rural South, 1865-1900*, vol. 3 of *African American Life in the Post-Emancipation South 1861-1900*. Edited by Donald G. Nieman. (Hamden, CT: Garland Publishing, 1994).

The Creation and Destruction of the Fourteenth Amendment During the Long Civil War,” *Louisiana Law Review*, Vol. 79 (Fall 2018): 189-239.

“Author’s Response to the Southern Intellectual History Circle Forum on *The Age of Lincoln*.” *The Journal of the Historical Society* IX:3 (September 2009): 355-72.

“Race Relations in the Rural South Since 1945,” pp. 28-58 in *The Rural South Since World War II*. Edited by R. Douglas Hurt. (Baton Rouge: Louisiana State University Press, 1998).

“South Carolina” chap. 7, pp. 191-232, 420-432, in *The Quiet Revolution in the South: The Impact of the Voting Rights Act, 1965-1990*. Edited by Chandler Davidson and Bernard Grofman. (Princeton: Princeton University Press, 1994), with et al. Winner of the 1995 Richard F. Fenno Prize, Legislative Studies Section, American Political Science Association.

“It Ain’t Broke, So Don’t Fix It: The Legal and Factual Importance of Recent Attacks on Methods Used in Vote Dilution Litigation,” et al., lead article in *The University of San Francisco Law Review* 27:4 (Summer 1993): 737-780.

“Tempering Society’s Looking Glass: Correcting Misconceptions About the Voting Rights Act of 1965 and Securing American Democracy” *Louisiana Law Review* Lead article for Vol. 76:1 (2015): 1-42.

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Collaborative Research with Dermatologists--Medical doctors and Computer Scientists

Published Articles:

- “Acne Treatment: Analysis of Acne-Related Social Media Posts and the Impact on Patient Care.” 2018 *Cutis* 102(1): 41-43 with Urso, B, Updyke KM, Domozych R, Solomon JA, Brooks I, Dellavalle RP, MD, PhD.
- "Natural Language Processing of Social Media to Evaluate Patient Global Impression of Change in Psoriasis Biologic Treatments: A Social Media Corpus Study" 2022 *JMIR Dermatology* with Caridad Maura Infante, Jeremy Jueng, Ashley Su, Shazmeen Jafar Shaikh, Robert Dellavalle, Ian Brooks, James Solomon

Publication Abstracts:

- Artificial intelligence (AI) comparison of social media-based patient-reported outcomes of PD-1, BRAF, and CTLA-4 inhibitors for melanoma treatment. *Journal of Clinical Oncology*. 2021;39(15_suppl). doi:10.1200/jco.2021.39.15_suppl.e21572, with Su A, Jueng J, Dupuis L, Brooks I, Sinha R, Maner B, Dellavalle R, Burton V, Solomon JA.
- Using Artificial Intelligence to Understand Patient Perspectives Towards Treatment of Dermatologic Diseases. *Journal of Investigative Dermatology*: July 2020 Ed. Abstract with Jueng J, Dupuis L, Su A, Kunadia A, Dellavalle R, Brooks I, Sinha R, Maner B, Siddiqui F, Burton V, Seyffert J, Solomon JA
- Use of Artificial Intelligence for Analyzing Emotions vs. Patient Global Impression of Change of Melanoma Treatments. *Journal of Clinical Oncology*. 38: 2020 (suppl; abstr e24177)

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with Su A, Dupuis L, Jueng J, Kunadia A, Brooks I, Sinha R, Siddiqui F, Maner B, Harding T, Dellavalle R, Seyffert J, Solomon J A.

Using Artificial Intelligence to Understand Patient Perspectives Towards Treatment of Dermatologic Diseases. Publication, 2020 Society of Investigative Dermatology Annual Meeting Abstract Booklet, Scottsdale, AZ, March 13, 2020, with Jueng J, Dupuis L, Su A, Kunadia A, Dellavalle R, Brooks I, Sinha R, Maner B, Siddiqui F, Seyffert J, Solomon JA.

Acne treatment utilization among patients on social media platforms (abstract). *J Invest Dermatol.*;137(5):s66, 2017 with With Urso B, Updyke KM, Domozych R, Solomon JA, Brooks I, Dellavalle R.

Identifying the most influential social media networks utilized by different populations of patients with autoimmune diseases (abstract). *J Invest Dermatol.*;137(5):s13, 2017 with Updyke KM, Urso B, Solomon JA, Brooks I, Dellavalle RP.

An overview of social media posts related to psoriasis patients' perspectives towards Humira (abstract). *J Invest Dermatol.*;137(5):s13, 2017 with Updyke KM, Urso B, Solomon JA, Brooks I, Dellavalle RP.

Accepted: "Using Artificial Intelligence to Analyze Publicly Available Social Media Posts to Understand Patient Perspectives Towards Specific Treatments of Alopecia Areata," with et al. in *JAAD International*

Presentation Papers:

Using Social Media to Understand the Patient Perspective and the Emotional Impact of Dermatologic Conditions. Presented at PRISM Virtual Health Symposium 2020, sponsored by University California San Francisco, 3-4 Dec 2020 with Meisenheimer J, Su A, Maner B, Dupuis L, Jueng J, Kunadia A, Brooks I, Sinha R, Siddiqui F, Dellavalle R, Seyffert J, Solomon JA.

Capturing Patient-Centered Perspectives via Social Media Data Sentiment Mining of Acne, Alopecia Areata, and Melanoma. Poster presentation, 2020 International Dermatology Outcome Measures Conference, Washington, DC, October 23-24, 2020 with Su A, Maner B, Dupuis L, Jueng J, Kunadia A, Brooks I, Sinha R, Siddiqui F, Dellavalle R, Seyffert J, Solomon JA.

Presentations, Posters:

Dupuis L, Jueng J, Su A, Kunadia A, Siddiqui F, Harding TP, Brooks I, Solomon JA, Burton V, Dellavalle R, Seyffert J. Comparing Patient Perspectives of Melanoma to Non-Oncologic Dermatological Disease (Non- Oncologic) via Social Media Data Mining. Poster presentation The Autoimmunity Conference, Athens, Greece, May 28, 2021.

Kunadia A, Brooks I, Solomon JA, Burton V, Dellavalle R, Seyffert J, Harding TP. Utilization of Patient Interactive Diaries to Establish a Database of Patient Reported Outcomes Generating a Cycle of Continuous Quality Improvement. Poster presentation The Autoimmunity Conference, Athens, Greece, May, 28 2021.

Jueng J, Maner B, Dupuis L, Su A, Kunadia A, Dellavalle R, Brooks I, Sinha R, Siddiqui F, Burton V, Seyffert J, Solomon JA. Discerning Patient Perspectives and Attitudes Towards Treatment of Dermatological Diseases Using Artificial Intelligence. Poster presentation, 2020 International Dermatology Outcome Measures Conference, Washington, DC, October 23-24, 2020.

Kunadia A, Brooks I, Solomon JA, Burton V, Dellavalle R, Seyffert J, Harding TP. Combining Social Media Mining and Patient Interactive Diaries for Population-Based Care. E-Poster Exhibit, American Academy of Dermatology Virtual Meeting Experience event, Denver, CO, June 13, 2020.

Dupuis L, Su A, Jueng J, Kunadia A, Dellavalle R, Brooks I, Sinha R, Maner B, Siddiqui F, Burton V, Seyffert J, Solomon J A. Capturing Patient Perspectives: Natural Language Processing of Social Media to Evaluate Patient Global Impression of Change in

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Dermatological Treatments. Poster presentation, Cochrane Skin Conference, Denver, CO, March 19, 2020.

Kunadia A, Haresh S, Shih S, Brooks I, Solomon JA, Burton V, and Dellavalle, R. Positive Sentiment for Biologic Therapies among Psoriasis Patients on Social Media: An Analysis of 4.8 million Social Media Posts from 2008-2019. ePoster Presentation. 24th World Congress of Dermatology 2019, Milan, Italy 10-15 June 2019

With Updyke KM, Urso B, Solomon JA, Brooks I, Dellavalle RP. "Identifying the most influential social media networks utilized by different populations of patients with autoimmune diseases." Oral poster presentation, 2017 Society for Investigative Dermatology Annual Meeting, Portland, OR. April 2017

With Updyke KM, Urso B, Solomon JA, Brooks I, Dellavalle RP. "An overview of social media posts related to psoriasis patients' perspectives towards Humira." Oral poster presentation, 2017 Society for Investigative Dermatology Annual Meeting, Portland, OR. April 2017

With Urso B, Updyke KM, Domozych R, Solomon JA, Brooks I, Dellavalle RP. "Acne treatment utilization among patients on social media platforms." Oral poster presentation, 2017 Society for Investigative Dermatology Annual Meeting, Portland, OR. April 2017

Interviews, Reports, Op-eds, and Other Publications:

On Jan. 11, 2022 with Armand Derfner the *Washington Post* published "Texas's New Attempt to Circumvent the Constitution Resurrects an Old Tactic: The state's abortion law embraces a mechanism used to defend Jim Crow" reprinted in several other newspapers (<https://www.washingtonpost.com/outlook/2022/01/11/texas-new-attempt-circumvent-constitution-resurrects-an-old-tactic/>).

Feb 26, 2022 the *Washington Post* published an op ed, "Biden's pick won't shift the Supreme Court, but here's what might" by Vernon Burton and his *Justice Deferred* co-author (<https://www.washingtonpost.com/outlook/2022/02/25/bidens-pick-wont-shift-supreme-court-heres-what-might/>) reprinted in several newspapers.

"The GA election and the Voting Rights Act," for the Clemson Humanities Hub and it was posted on June 17, 2020 at <https://blogs.clemson.edu/humanitieshub/2020/06/17/the-ga-election-and-the-voting-rights-act/?fbclid=IwAR2Gx4S5JIJrK784YnwCk5ezMkdQVMTLX7av9dQiwWz2nytvVbdkKaWzeLU>

"A Brief Conversation with James M. McPherson," in *The Struggle for Equality: Essays on Sectional Conflict, the Civil War, and the Long Reconstruction in Honor of James M. McPherson*. Edited by Burton et al., pp. 288-92 (Charlottesville: University of Virginia Press, 2011).

"We must learn not to hide from our racist past," *Greenville News* December 27, 2014.

"Dr. Lacy K. Ford Jr.," *Caroliniana Columns: University of South Caroliniana Society Newsletter*, Issue 35 (Spring, 2014), pp. 3-4.

"A Few Words about Allen Stokes as He Retires as Director of the South Caroliniana Library," *Caroliniana Columns: University of South Caroliniana Society Newsletter*, Spring 2013, pp. 1, 4-5.

"UI Earns Right to be Mr. Lincoln's University: Excerpted from remarks by Prof. Vernon Burton, April 1, 2010 keynote address at the UI College of Law," *The News Gazette* (Champaign, Illinois) May 23, 2010, pp. C-1 and C-4.

"Learning from the Bicentennial: Lincoln's Legacy Gives Americans Something for which to Strive," *The News Gazette* (Champaign, Illinois) February 12, 2010, pp. C-1 and C-4.

"Life of Lincoln Resonates Today," *The Atlanta Journal-Constitution*, Opinion, Dec. 9, 2009, A19.

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“Colbert History,” *Pan-African Studies*, Fall 2009, p. 3.

“Remarks by Professor Orville Vernon Burton at the October 10, 2009 Celebration of Abraham Lincoln’s September 30, 1959 Speech,” Delivered at the Milwaukee War Memorial Center at the Invitation of the Wisconsin Lincoln Bicentennial Commission, Appendix pages 166-177 in *Final Report and Appendix of the Wisconsin Lincoln Bicentennial Commission*, To: The Governor of the State of Wisconsin, Jim Doyle, Responsive to: Executive Order #245, Date: February 12, 2010.

“Max Bachmann’s Bust of Abraham Lincoln, Circa 1915,” pp. 88-89 in *Lincoln in Illinois*, Ron Schramm, Photographer and Richard E. Hart, Compiler and Editor (Springfield: published by the Abraham Lincoln Association, 2009.

“Liberty,” in the Fetzer Institute’s *Booklet of Notable Lincoln Quotations*, 2009.

“Is There Anything Left to Be Said about Abraham Lincoln?” *Historically Speaking* 9:7 (September/October 2008): 6-8.

“An Interview with Vernon Burton” *Lincoln Lore*, no. 1894 (Fall 2008), pp. 18-24.

“Lincoln’s Generation also Faced Crisis Involving Religion and Terrorism,” in *History Network Newsletter*, February 25, 2008.

“Abraham Lincoln, Southern Conservative: An Interview with Orville Vernon Burton” (2 Parts), posted by Allen Barra, October 2, 2007.

http://www.americanheritage.com/blog/200710_2_1259.shtml and

http://www.americanheritage.com/blog/200710_2_1260.shtml

Interview by Roy A. Rosenzweig, 2001, “Secrets of Great History Teachers,” *History Matters*, at <http://historymatters.gmu.edu/browse/secrets/>.

“Keeping Up With the e-joneses: Information Technology and the Teaching of History,” *Proceedings for First Annual Charleston Connections: Innovations in Higher Education Conference. Learning from Each Other: The Citadel, The College of Charleston, The Medical University of South Carolina, Charleston Southern University and Trident Technical College.* June 1 and 2, 2001, The Citadel, Charleston, South Carolina, p. 63.

(with Terence Finnegan and Barbara Mihalas) “Developing a Distributed Computing U.S. Census Database Linkage System,” Technical Report 027 (December 1994). National Center for Supercomputing Applications, UIUC.

“On the Study of Race and Politics,” *Clio: Newsletter of Politics & History, An Organized Section of the American Political Science Association* 3:1 (Fall & Winter, 1992/1993): 6.

“Benjamin Mays of Greenwood County: Schoolmaster of the Civil Rights Movement,” *South Carolina Historical Society News Service*, published in various newspapers, 1990.

“Quantitative Historical U.S. Census Data Base” in *Science: The State of Knowing*. National Center for Supercomputing Applications, Annual Report to the National Science Foundation 1987, p. 29.

“Computer-Assisted Instructional Database Programs for History Curricula” *Project EXCEL*. 1986-87 Annual Report. Office of the Chancellor, UI at Urbana-Champaign, pp. 41-42.

“Postmodern Academy,” *The Octopus*, January 24, 1997, p. 6.

(with David Herr and Ian Binnington) “Providing Lessons in Mississippi River Basin Culture and History: riverweb.ncsa.uiuc.edu,” in *Touch the Future: EOT-PACI*, 1997, p. 43.

“The Coming of Age of Southern Males During Reconstruction: Edgefield County, South Carolina,” Working Papers in Population Studies, School of Social Sciences, University of Illinois at Urbana-Champaign, 1984.

In Memorial – Essays for Charles Joyner, F. Sheldon Hackney, Bertram Wyatt-Brown in the American Historical Association (AHA) *Perspectives*; Thomas Krueger and Philip Paladin in Organization of American Historians *OAH Newsletter*, and F. Sheldon Hackney JSH LXXXI:2 (May 2015), pp. 350-52, and Ernest L. “Whitey” Lander, in *Journal of Southern History*.

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“Creating a Major Research Archive on Southern History,” *Caralogue: The Journal of the South Carolina Historical Society*, June, 2015.

A number of brief essays about the Clemson CyberInstitute, for example, “Clemson’s CyberInstitute encourages Collaboration,” <http://features.clemson.edu/inside-clemson/inside-news/clemson%E2%80%99s-cyberinstitute-encourages-collaboration/>

In addition, I have written a number of reports as expert witness for minority plaintiffs in voting rights and discrimination cases.

Digital Publications and Projects:

Editor in Chief, *The Long Civil War: A Digital Research and Teaching Resource*, Alexander Street Publishers (Now Proquest) , 2013-

Editor in Chief, *Slavery and Anti-Slavery: A Transnational Archive*. The Largest Digital Archive on the History of Slavery. Farmington Hills, MI: Thompson-Gale, 2007--14.

<http://www.galetrials.com/default.aspx?TrialID=16394;ContactID=15613>. Advisory Board: Ira Berlin, Laurent Dubois, James O. Horton, Charles Joyner, Wilma King, Dan Littlefield, Cassandra Pybus, John Thornton, Chris Waldrep.

Part I: Debates Over Slavery and Abolition, 2009

Part II: Slave Trade in the Atlantic World, 2011

Part III: Institution of Slavery, 2012

Part IV: Age of Emancipation, 2014

Webmaster for the Abraham Lincoln Bicentennial Commission Website, 2007-10, now maintained by the ALB Foundation. <http://www.lincolnbicentennial.gov/>

"Does Southern Exceptionalism Exist," *Inside Clemson*, May 14, 2014.

<http://newsstand.clemson.edu/does-southern-exceptionalism-exist/>

Lincoln Remembered: Nine essays – “Lincoln and the Founding of Democracy’s Colleges,” “Lincoln: America’s “First and Only Choice,” “Picturing Lincoln,” “Putting His Politics on Paper,” “Belief in the Rule of Law,” “Taking a Stand Against Slavery,” “The Movement Toward Civil Rights,” “Political Brilliance on the Path to the Emancipation Proclamation,” “Lincoln’s Last Speech,” commemorating the bicentennial of Lincoln’s birth, February 2009 to February 2010. A monthly blog for the Illinois LAS On-line Newsletter; available at <http://www.las.illinois.edu/news/lincoln/>.

Writing the South in Fact, Fiction and Poetry: A Conference Honoring Charles Joyner. Thursday and Friday Sessions. DVD produced of Conference I organized at Coastal Carolina University, Conway, SC, Feb. 17-19, 2011. Produced CD Aug. 2011.

Editor, “Slavery in America in Sources in U.S. History Online.” Farmington Hills, MI: Thompson Gale, 2007.

“The Mississippi River in American History,” for *Mark Twain’s Mississippi*, including essays with Simon Appleford and Troy Smith, on “Economic Development, 1851–1900,” “Politics, 1851–1900,” “African Americans in the Mississippi River Valley, 1851–1900,” “Native Americans in the Mississippi River Valley, 1851–1900,” “Religion and Culture, 1851–1900,” and “Women in the Trans-Mississippi West, 1851–1900.” Edited by Drew E. VandeCreek, Institute of Museum and Library Services (IMSL) Project (2007). Online Resource: <http://dig.lib.niu.edu/twain/>.

RiverWeb: An interdisciplinary, multimedia, collaborative exploration of the Mississippi River's interaction with people over time (now redone as Cultural Explorer). CD-ROM and Website <http://riverweb.ncsa.uiuc.edu/>.

The Illinois RiverBottom Explorer (IBEX). Part of the East Saint Louis Action Research Project (ESLARP) where Faculty and East St. Louis neighborhood groups and local churches work on tangible and visible projects that address the immediate and long-term needs of some of the city's poorest communities. (More is available at

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<http://www.eslarp.uiuc.edu/>). IBEX serves as a resource for historical documents, primary and secondary sources, and oral history interviews. Website:
<http://www.eslarp.uiuc.edu/ibex/archive/default.htm>.

Text96. A collection of primary source electronic texts for teaching American History. Website
<http://www.history.uiuc.edu/uitext96/uitexttoc.html>.

“Database Exercises and Quantitative Techniques: Exercise I: Colonial America.” Madison, WI: Wiscware, 1987. (for IBM and compatible computers, 1 disk, Instructional Workbook, and Teacher’s Instructional Sheet).

“Lessons in the History of the United States.” Wentworth, NH: COMPRESS, 1987 (1989 with QUEUE, Fairfield, CT). For IBM color monitor; originally 50 computer exercise modules on 25 computer disks + instructor’s manual. An interactive electronic textbook of U.S. history.

Automated linkage and statistical systems Unix Matchmaker, AutoLoad, RuleMatch, DisplayMatch, ViewCreate (Urbana: UI NCSA, 2000).

Website <http://www.granger.uiuc.edu/aitg/maps/1870/htm/default.htm>

“Illinois Windows Dataentry System for U.S. Census.” University of Illinois, 1988 (for IBM PS2 and compatible computers with Windows applications, 1 disk, Instructional Sheet)

Justice Deferred: Race and the Supreme Court website at (<http://justice-deferred.clemson.edu>)

The Age of Lincoln website at (<https://ageoflincoln.wpengine.com>)

Current Digital Projects include Social Media Learning Center Studies of Elections, Redistricting, Minorities, and Discussions of the American South, Race, and the Civil War. Also text and data analytics (mining) – developing techniques using the HathiTrust, Internet Archive II Digital Book Collection, and Library of Congress Chronicling America U.S. newspaper archive to study “DNA” of writings of Abraham Lincoln, changing views of American South over time, interpretations of Civil War and development of “Lost Cause Mythology.”

In addition, I continue to use Edgefield County, South Carolina to investigate, “large questions in small places.” I have accumulated a quantitative database that includes every person and farm recorded in the U.S. manuscript census returns linked from 1850 to 1880 for old Edgefield District, South Carolina (a region now comprising five different counties). With this unique database I (and my students) can study, test, and suggest themes in American History with details and specificity related to the lives of ordinary folks.

Selected Grants:

National Science Foundation (NSF), GK-12: Ed Grid Graduate Teaching Fellows Program, 2003-09 (\$4,990,015)

NSF, EAGER: Prototype Tool for Visualizing Online Polarization (co-Pi), 2012-16 (\$262,654)

NSF CISE/IRIS Division Award, Grant No. ASC 89-02829, Automated Record Linkage, 1991

NSF Grant No. CDA-92-11139, “Historical U.S. Census Database with High Performance Computing,” 1992

NSF, EPIC Grant, 2006-08 (\$20,000)

NSF Catalyst Grant for Social Science Learning Center (with MATRIX, Michigan State University), 2006-09 (\$175K)

NSF, Senior Investigator on the MRI award, Award #1228312 MRI: Acquisition of High Performance Computing Instrument for Collaborative Data-Enabled Science (\$1,009,160) See:

http://nsf.gov/awardsearch/showAward?AWD_ID=1228312&HistoricalAwards=false

National Parks Service, “*Administrative Histories of Fort Sumter National Monument and Charles Pinckney National Historic Site*,” \$110,000.00 (2014-2019)

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Clemson University, "Tracking Themes Across Time and Space," 2012 (\$10,000)
 National Endowment for the Humanities (NEH) Challenge Grant for Institute for Computing in Humanities, Arts, and Social Science, 2008-11 (\$750,000, 3 mil. Total with challenge matches)
 NEH Educational Technologies Grant, ED-20758, 1997-99
 NEH Humanities High Performance Computing Advance Research and Technology (HpC): Coordinating High Performance Computing Institutes and the Digital, 2008-09 (\$249,997). To support a total of nine institutes and one joint conference for humanities scholars, to be hosted by three different high-performance computer centers: the National Center for Supercomputing Applications, the Pittsburgh Supercomputing Center, and the San Diego Supercomputer Center.
 NEH, NSF, and the Joint Information Systems Committee, "Digging Into Image Data to Answer Authorship Related Questions," 2009-11 (\$100,000).
 NEH, The Cartography of American Colonization Database Project, To support the development of a database of 1000 historical maps illustrating the trajectory of colonization in the Americas. The database provides a searchable introduction to the mapping of the western hemisphere in the era of European expansion, ca. 1500-1800. 2008-09 (\$24,997), with Max Edelson.
 NEH Conference Grant (with R. C. McMath, Jr., History and Social Sciences, Georgia Institute of Technology), 1978-80
 NEH Summer Research Fellowship, 1983
 American Council of Learned Societies (ACLS) Travel grant, 1977
 American Council of Learned Societies (ACLS) Grant- to Recent Recipients of the Ph.D., 1977
 PT3/Technology Across Learning Environments for New Teachers grant, U.S. Department of Education, 2002-03, 2003-04
 Academy of Academic Entrepreneurship, 2006-08
 National Archives Record Administration grant for digital records, 2003-05
 IBM Shared University Research Grant, 1994
 IBM Innovations grant, Educational Technologies Board, 1992
 IBM Technology Transfer IBM grant, 1988
 IBM EXCEL II, History Database Teaching Project, 1987
 IBM EXCEL Project, History Database Teaching Project, 1986
 Partnership Illinois Award, 1998 (with Brian Orland, Pennsylvania State University Landscape Architecture, East St. Louis Research Project), RiverWeb 2002-03, 2003-04
 East Saint Louis Action Research Program Grant, 2005-06, 06-07, 07-08
 Andrew Carnegie Foundation 3-year Baccalaureate Study Grant, 1976
 Sloan Center for Asynchronous Learning Environment Grant, 1998
 South Carolina Humanities Grant for Lincoln's Unfinished Work, \$7,000, 2018-19
 The Humanities Council (South Carolina) Outright Grant (\$8,000), THC grant #10-1363-1 (Writing the South in Fact, Fiction, and Poetry), 2011
 South Carolina Humanities Council Conference Grant (with Tricia Glenn), 2005
 South Carolina Humanities Council Conference Grant (with Winfred Moore), 2002-03
 South Carolina Humanities Council Conference Grant (with Bettis Rainsford), 2000-01
 "Improving patient outcomes by listening to their social media communications,"
Homecare Education And Resource Team Support (H/E/A/R/T/S), \$15,000, 2017-19, with Ian Brooks, University of Illinois.
 Grant for Conference on "Lincoln's Unfinished Work," Thomas Watson Brown Foundation, \$17,560, 2017- 18
 Grant for Lincoln's Unfinished Work, The Abraham Lincoln Bicentennial Foundation, \$27,000, 2017-20

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Self Family Foundation, \$6,000 for Lincoln's Unfinished Work, 2018-19.

The Humanities Council (South Carolina) Outright Grant (\$8,000) for Lincoln's Unfinished Work Conference.

The Jean and Bill Soman Spiegel Foundation Grant for Lincoln's Unfinished Work, \$3,500, 2018-19

The University of South Carolina University South Carolinian Society Foundation, Grant for Lincoln's Unfinished Work, \$3,500, 2018

The College of Charleston Library Foundation for Lincoln's Unfinished Work, \$2,000

Ford Foundation Grant to bring Minority Students and their Teachers to participate in "Lincoln's Unfinished Work" conference and workshop on how to teach the History of race relations in South Carolina public schools, \$5,000, 2018-19.

NEH Public Humanities Exhibitions: Implementation Grant (with Rhondda Thomas), 2020-23

Selected Grants from University of Illinois

Office of Continuing Education Grant, 2005-06, 06-07

Chancellor, Provost, and Vice Chancellor Research, RiverWeb Grant, 2004-05 (\$30K)

Advanced Information Technologies Group Research Award, 1994, 96, 97, 2000

Applications of Learning Technologies in Higher Education grant for UI--Text96 Project, 1995--2000 (co-principal investigator with Richard Jensen of UIC campus)

Educational Technologies Board Grant for RiverWeb 1998

Guided Individual Study Grant for RiverWeb, 1997-98

Program for the Study of Cultural Values and Ethics, Course Development Award, 1993

Arnold O. Beckman Research Grant Award, UIUC Research Board, 1989, 1992

Language Laboratory Computer Assisted Instruction Award, 1988

Research Board Humanities Faculty Research Grant, 1986

Graduate Research Board, support for various projects, 1976-08

Selected Grants from Clemson University

2011/2012 University Research Grant Committee (URGC) Program (\$10,000)

2013-14 CAAH & Library Digital Humanities Grant (\$4000)

2018- Clemson Humanities Hub Short Term Visiting Humanities Fellowship, a grant to help fund the Conference on Lincoln's Unfinished Work (\$5,000)

CAAH Equipment Grant, \$1,500, 2021.

CAAH Faculty Research and Development Grant, \$5,000, 2021-22.

Selected Professional Activities:

Officer Congressional Abraham Lincoln Bicentennial Commission Foundation, 2008-2010;
Board of Directors, Abraham Lincoln Bicentennial Foundation, interim President, 2010, vice-chair 2010-17

Southern Historical Association, President 2011-12, President Elect, 2011, Vice President Elect, 2010, Executive Council, 2005-08, 09-15; Program Committee 1989, 1998; 2005 (Chair); Membership Committee, 1986-87, 1991-92; 1995-98; 2002; Committee on Women, 1992-95, Nominating Committee, 1999-2000, Chair H.L. Mitchell Book Award Committee, 2000-02

Agricultural History Society, President 2001-02, Vice President 2000-01, Executive Committee, 1997-2006; Committee to Review and Revise Constitution and By-Laws, 2004-05; Nominating Committee, 1991-94, chair 1993-94; Committee to Select first Group of Fellows for Society, 1995; Committee to select new Secretary/Treasurer, 2009-10

Organization of American Historians, Included in the Organization of American Historians Race Relations Expert Guide, 2015-, OAH/ALBC (Abraham Lincoln Bicentennial

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Commission) Abraham Lincoln Higher Education Awards Committee, 2007-09; ABC-CLIO “America: History and Life” Award Committee, 1997-99; Membership Committee, 1990-94, nominated for executive board 1989.

Social Science History Association, Executive Committee 2000-03; Nominating Committee 1990-91; Program Committee 1989, 1993; Community History Network Convener, 1976-79; Rural History Network Convener, 1988-90, 1993-94

Social Science Computing Association, Executive Council, 1993-2002; Organizing Committee Chairperson for Annual Conference, 1993, Conference on Computing for the Social Sciences (CSS93); program committee 1993-95, 2001

American Historical Association, Nominated for Vice President for Teaching, 2009

Southern Association for Women Historians, Membership Committee, 1996-99

The Society of Civil War Historians, Chair Thomas Watson Brown Book Award for the best book published on the causes, conduct, conduct, and effects, broadly defined, of the Civil War, 2017-18.

South Carolina Historical Association, Executive Board, 2009-12

H-Net, founding member of H-Net, Treasurer and Executive Committee, 1993-99; Chair, committee to evaluate multimedia NEH grant; Editor H-South (book review editor 1997-2000); Editorial Board of H-Rural, H-Slavery, and H-CivWar.

Selected service Activities:

Scholarly Advisory Group, President Lincoln’s Cottage at the Soldier’s Home, 2012-Executive Council, The University South Caroliniana Society, 2011-15

University of South Carolina, Search Committee for Director South Caroliniana Library, 2012

Executive Board South Carolina Jubilee Project, 2012-14

Member South Carolina Abraham Lincoln Bicentennial Commission, 2008-2010

Member Champaign County, Illinois, Abraham Lincoln Bicentennial Commission, 2006-10

Council, U.S. Civil War Sesquicentennial Commission, 2009-15

Historical Advisory Committee to the “Fort Sumter/Fort Moultrie Trust,” charged with organizing Sesquicentennial Activities in Charleston and South Carolina Lowcountry, 2010-15

The Illinois Humanities Council Scholar, 2004-05

Presented to President’s Information Technology Advisory Commission (PITAC), 9-16-2004

Invited to NEH Digital Humanities Initiative Mini-Conference, March 2006 and Digital Humanities Summit, April 2011, December 2007

Digital Library Federation Scholars’ Advisory Panel, 2004-7

University of Tennessee Knoxville Horizon Project Steering Committee, 2014-

Peer Reviewer, ACH/ALLC/SDH-SEMI Joint Digital Humanities Conferences, 2007-13

E-Docs, (one of 3 founding members) Editorial Board, 1998-2005

Mentor for Southern Regional Council Minority Scholars Program, 1992-96

UIUC Representative to Lincoln Presidential Library Committee: Educational Activities Committee, 2001; Fellowship Committee, 2002

Faculty Associate, Council for International Exchange of Scholars, 2002-03

Evaluator/Referee (one of two for history) for the Pew Foundation Faculty Research Fellowships, 1997-98, 1998-99; 2001 (for graduate students for summer seminar)

Evaluator and Referee for American Council of Learned Societies Grants, 2005-08

National Endowment Humanities, Review Panels: Scholarly Editions Program, 2007-08, for Digital Humanities Grants, 2010, NEH Division of Public Programs Panel, “America’s Historical and Cultural Organizations” (AHCO) grant initiative, 2013; Humanities Connections, 2016

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National Science Foundation Review Panel for Knowledge and Distributed Intelligence grants, 1998, 1999

Humanities, Arts, Science, and Technology Advanced Collaboratory (HASTAC), Steering Committee and Planning Committee, 2003-04, Program Committee, 2009, 2010, 2013-14

Advisory Committee, American Studies Program, U.S. Bureau of Educational and Cultural Affairs, U.S. Information Agency, 1989-93

Delegate to the Mexican/American Commission on Cultural Cooperation, Mexico City, June 1990; Chairperson of United States delegation (Co-Chairperson with Mexican counterpart), U.S. Studies Working Group

Advisor for “Crossroads of Clay”: NEH Alkaline Glazed Stoneware Exhibition and Catalog, McKissick Museum, University of South Carolina, 1987-90

Advisory Committee Film Project for Historic Southern Tenant Farmers Union, 1986-90

Consultant, Commercial film, “Roll the Union On” about H.L. Mitchell and the Southern Tenant Farmers Union

Consultant on the Renewal of the 1965 Voting Rights Act, 1981-82, 2004-07, including consultation for an NBC TV Special.

Consultant for Documentary, “Behind the Veil,” 1995-2005

Board of Directors of the Abraham Lincoln Historical Digitization Project, 1997-

Advisory Council for the Lincoln Prize at Gettysburg College, 1997-

Prize Committee for the Technology and History Award, The Gilder Lehrman Institute of American History, 2000-01

International Committee on Historic Black Colleges and Universities, 2001-15

Consultant, Belle Meade and The Hermitage and Vanderbilt University. Presentations of slavery.

Consultant, Morven Park, 2010-12

Consultant, for Matt Burrows, documentary “The Assassination of N.G. Gonzales by James H. Tillman,” 2010-

Consultant, for Chris Vallilo musical performance, “This Land is Your Land: Woody Guthrie and the Meaning of America,” 2010-

Organizing and Founding Committee International Society for the Scholarship of Teaching and Learning (IS-SOTL), 2003-7. Drafted initial mission statement for Society.

Furman University Alumni Council Board, 2010-16

International African American Museum (IAAM) Program Subcommittee and History Advisor (Charleston, SC), 2016-

IAAM, Content team for an exhibit wall located in the Carolina Gold gallery entitled Built on Slavery, 2018-

Dr. Benjamin E. Mays Historical Preservation Site Foundation Board, 2015-

Advisory Board for “History of the American South,” Atlanta History Center, 2021-

Advisory Board for *International Journal of Social Education*, 1986-2000

Advisory Reviewer for *The Journal of Negro History* (since 2002, *The Journal of African American History*), 1992-

Advisory board for the online *South Carolina Encyclopedia*. Southern Studies Institute, University of South Carolina, 2015-

Advisory Board, Digital Library on American Slavery, University of North Carolina, Greensboro, 2004-10

Advisory Board, Biographies: The Atlantic Slaves Data Network (ASDN), 2010-

Advisory Board, Simms Initiatives of the Library at the University of South Carolina, 2009-14

Advisory Board, American Insight, 2013- (www.AmericanINSIGHT.org)

Strategic Advisory Council for MATRIX: The Center for Humane Arts, Letters and Social Sciences On-line at Michigan State University, 2004-

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Advisory board, of the Michigan State University MATRIX online project, “Mapping Civil War Politics”
 External Advisory Board (EAB) of proposed Center of Data for the Public Good, University of North Carolina, Chapel Hill
 Advisory Board, The Virtual Archives for Land-Grant History Project, Association of Public-Land Grant Universities, 2012-
 External Advisory Board, National Historic Preservation Research Commission (NHPRC) “Effective User-Centered Access For Heterogeneous Electronic Archives” project, Illinois Institute of Technology, 2003-05
 Advisory Board, *Postwar America: An Encyclopedia of Social, Political, Cultural, and Economic History*
 External Advisory Board (EAB) of the proposed NSF Center for Data Science and Engineering, University of North Carolina, Chapel Hill, 2014-
 National Advisory Board to Alan Lomax's Global Jukebox: 1993-2015
 The Civil Rights Project at University of California, Berkeley, Advisory Board for “The Decade Ahead: Reauthorization of the Voting Rights Act and the Future of Democratic Participation,” 2004-07
 Advance Research and Technology Collaboratory for the Americas (ARTCA) –Organization of American States, Advisory Board Chair, 2008-
 History Advisor for Gullah-Geechee Corridor Board, 2019-
 Reconstruction Era National Historical Park (REER) Service Advisory Board
 Chair History Advisory Board for Echo Reconciliation Project, 2020-
 Senior Historians Advisory Board, North Carolina Civil War and Reconstruction History Center, 2020-
 Commissioner South Carolina African American Heritage Commission (SCAAHC) 2002-24

Editorial Boards:

Associate Editor for History, *Social Science Computer Review*, 2012- (reappointed 2020-)
 Editorial Board, [International Journal of Humanities and Social Science Research](#), 2015-
 Editorial Board, Digital Humanities Series, University of Illinois Press, 2005-
 Editorial Board, *Change and Continuity*, 1995-
 Editorial Board *Fides et Historia*, 2010-
 Editorial Board *Proceedings of the South Carolina Historical Association*, 2009-14
 Editorial Board, *History Computer Review*, 1990-2003
 Editorial Board, *Locus: An Historical Journal of Regional Perspectives on National Topics*, 1994-96
 Editorial Advisory Board, *The South Carolina Encyclopedia*, gen. editor Walter Edgar, 2000-06

Service Clemson University:

Chair, Search committee for Dean of the Library, 2017-18
 Search Committee for Dean of CAAH, 2019-20
 Search for University Historian, 2019-20
 Screening committee for the new University Historian, 2021
 Faculty Advisory Committee for Education & Interpretation MAP - Historic Properties, in process of becoming an official Faculty Museum committee, 2021-
 Provost's Research Strategy Committee, 2014-16
 Martin Luther King, Jr. program planning committee, 2013-
 University Committee to commemorate 50th Anniversary Integration Clemson, 2011-13

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University Morrill Act Anniversary Celebration, 2011-13
Inaugural Faculty in Residence (Norris Hall), 2011-13
Workshop on Diversity and Inclusion, 2013
Lincoln's Unfinished Work Conference, 2018

Pan-African Advisory Committee, 2014-17; Steering Committee, 2017-, Chair Speaker's committee, 2018-19
Clemson Center for Geospatial Technologies Advisory Committee, 2017-
GIS Steering Committee, 2012-
Clemson University Computational Advisory Team (CU-CAT), 2010-
University Academic Technology Council, 2010-
Ex-officio Steering Committee, Clemson CyberInstitute, 2010-16
Outstanding Staff Employee Award, Academic Affairs Selection Committee, 2011
Ben Robertson Society (BRS) Foundation Advisory Board, 2013-
Chair, Clemson University Humanities Grid committee, 2012-14
Chair, CAAH Digital Humanities Computing committee, 2013-15
CAAH, Digital Humanities Ph.D. taskforce, 2014-16
CAAH taskforce on undergraduate "Creativity Certificate"

History Department Service:

History Department Graduate Committee, 2017-18
Search Committee for Director Digital History Ph.D. Program, 2019-20
History Department Civil War Sesquicentennial Committee, 2010-15
History Department Digital MA, then Digital Ph.D. committee, 2011-
History Department committee to review university signage, 2015-

Service - University of Illinois (three campus system – Urbana, Chicago, Springfield)
UI Senate Conferences (elected), all three campuses of the University of Illinois, 2006-09,
Presiding officer (chair) 2007-08

Lincoln Bicentennial Commission, 2006-09
Academic Affairs Management Team, 2007-08
Task Force for Global Campus, 2006-07
External Relations Management Team, 2006-09
Strategic Plan Committee, 2005-06

Service (selected) University of Illinois at Urbana-Champaign
Faculty Senate (elected), 1999-2001, 2002-03; 2005-06, 2006-07, Presiding Officer (Chair, Senate Executive Committee), 2005-06, 2006-07 (was Senate Council) elected 2000-01, 2003-04; 2005-06; 2006-07; Chair, Education Policy Committee, 2002-03, Chair 2003-04; Budget and Priorities Committee, 1999-01, Chair 2000-01

As Chair Faculty Senate Executive Committee, 2005-07 represented faculty at Board of Trustee meetings, and CIC meetings. Led in developing ideas of shared governance, helped in the drafting and implementing of a strategic plan for both the University of Illinois and the Urbana-Champaign campus. Oversaw establishment of the Illinois Informatics Institute (I3) and the School of Earth, Society, and Environment. Dealt with issues of multi-year contracts for research faculty and staff policy, rehiring of retirees, Global Campus, and led study of Academic effects of Chief Illini and diversity issues.

Organizer and Chair, Planning Committee for the Lincoln Bicentennial, 2006-09
Task Force for Diversity and Freedom of Speech, 2007-08
Convocation address, August 21, 2000
Search Committee for Chancellor, vice-chair, 2004-5

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Association of American Colleges and Universities campus representative and Assoc., 2004-05
 Martin Luther King, Jr., Week Planning Committee, co-chair, 2002-03, 03-04, 04-05, 05-06
 Strategic Plan Committee, 2005-06
 Chancellor's Task Force ("Kitchen Cabinet") for the Humanities, 2002-04
 Provost's ad hoc Committee on Evaluating Public Service for Promotion and Tenure, 2003-04
 Brown Jubilee Planning Committee, Diversity Initiative, 2002-04
 Law-Education *Brown* Jubilee Conference Program Committee, 2002-04
 East St. Louis Action Research Projects (ESLARP) Campus Advisory Committee, 2004-9
 University Planning Council, 2000-01
 Selection Committee for University Scholars, 1999 -- 2000, Chair Subcommittee for Social
 Sciences, Humanities, FAA, Communications, Education, Law 2000
 UI President's Distinguished Speakers Program, 2000-02, 2006-08
 University of Illinois Press Board, 1995-2000, Chair 1998-2000
 Search Committee for Director University of Illinois Press, 1998-99
 Committee on University Publishing, 1997-98
 Graduate College Executive Committee, 1998-2000; Committee to Evaluate Dean of Graduate
 College, Committee to Review and Implement Graduate Program Revisions, Graduate
 Student Grievance Policy Committee
 Graduate College Office of Minority Affairs Strategic Planning Committee, 1999-2000
 University Administration Budget and Benefits Study Committee, 2000-02
 Budget Strategies Committee, 1993-94, Subcommittee for Library. Subcommittee for Faculty
 Productivity and Teaching Models
 Illinois Program for Research in the Humanities (IPRH) Advisory Committee, 2001-03
 Center for Democracy in a Multicultural Society, Advisory Committee, 2002-08
 Center for Advanced Study George A. Miller Committee, 2000-03
 African American Studies and Research Program (AASRP), later Department of African
 American Studies, Advisory Council, 1982-86; Curriculum Development & Faculty
 Recruitment Committee, 2002-2003; Research and Course Competition Committee,
 1991-94, Chair 93-94; Electronic Networking Committee, 1996-2000, Chair 1997-98;
 Library Advisory Committee, 1997-2003
 UI-Integrate Faculty Advisory Committee, 2003-04
 Graduate College Area Subcommittee for the Humanities and Creative Arts, 1996-98
 Campus-wide Advisory Committee for the Center for Writing Studies, 2000-01
 Committee on Institutional Cooperation (CIC), Selection Committee for CIC Research Grants in
 the Humanities, 1993-94
 Chancellor's Task Force for Minority Graduate Students, 1989-92
 Chair, Subcommittee for Summer Program for Minority Graduate Students, 1990
 Computer Resources Development Committee, Program for the Study of Cultural Values and
 Ethics, 1991-93
 High Performance Computing Committee for the Social Sciences, 1989-95
 Rural History Workshop Convener, 1989-94 (with Sonya Salamon)
 Faculty Fellow, 1990-2003
 Graduate College Fellowship Committee, 1988
 Selection Committee for Lily Fellows, 1987
 Social Studies Committee for the Preparation of Teachers, Council on Teacher Education, 1986
 Chair, Search Committee for African-American Scholar, 1986-87
 Search Committee, Director for AASRP, 1985-86, Chair 87-88
 Graduate College Appeals Committee, 1984
 Chancellor's Allerton Conference, 1988; Chancellor's Beckman Conference, 2001-06;
 Chancellor's Conference on Diversity, 2002, faculty facilitator
 Combating Discrimination and Prejudice Workshop, 1988

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Krannert Art Museum, Committee on The Black Woman as Artist, 1992
 H. W. Wilson Faculty Panel, 1993
 Advanced Information and Technology Committee, 1992-97, Advisory Committee, 1993-94
 Honors Symposium for UI recruitment of High School Seniors, 1993
 Search Committee for Archivist, UIUC Computing and Communications Service Office, 1993
 Search Committee for Research Librarian, UIUC Library, 1997; Undergraduate Library
 Advisory Committee, 2002-9
 Member Human Dimensions of Environmental Systems Group, 1997-2017
 Faculty Learning Circle for 2003-04
 Illini Days Speaker, 1999, 2000, 2002
 Public Interest Fund of Illinois Representative, 1996- 08
 Facilitator for Interinstitutional Faculty Summer Institute on Learning Technologies, UIUC,
 2000, 2002
 Board Advisors, Collaborative for Cultural Heritage and Museum Practices (CHAMP), 2005-08
 Faculty Mentor for Campus Honors Program, 1980-2008

Service - College of Liberal Arts and Science UI:

Lecturer at Pedagogy 2000: Teaching, Learning and Technology, Annual UIUC Retreat on
 Active Learning (2000)
 Keynote Address at LAS Awards Banquet, 2000 and Keynote at UIUC Campus Awards
 Banquet, 2000
 Dean's Committee to Evaluate Chair of History Department (1 of 3 elected by History
 Department), 1996
 Oversight Committee Computing for the Social Sciences, 1993-95
 Committee to select nominees for election to College Executive Committee, 1992
 Academic Standards Committee, 1983-85, Chair 1984-85
 School of Humanities Scholarship and Honors, 1986-88, Chair 1987-88
 Social Sciences and Humanities Respondent to the Joint Task Force on Admission Requirements
 and Learning Outcomes, 1988
 Advisory Committee, Social Sciences Quantitative Laboratory, 1987-88, 1989-93
 Alumni Association Annual Speaker, 1990
 General Education Committee, 1990-91
 Awards Committee, Chair, 1991-92
 Race & Ethnicity, Class & Community Area Committee of Sociology Graduate Program, 1993-
 2009
 LAS Alumni Association Speaker, 2000
 Cohn Scholars Honors Mentoring Program (choosing the 10 best Humanities first-year students),
 1986-88, 1989-90, 1992-93, 1995-96, 1998-99, 2002 -05
 Faculty Mentor, Committee of Institutional Cooperation Summer Research Opportunities
 Program for Minority Students, 1987, 1991-95, 1997-2000, 2002, 2003
 Faculty Mentor, McNair Minority Scholars, 1993-94, 1996-97
 Summer Orientation and Advance Enrollment Program, Faculty Leader, 1991-93, 2000, 2002,
 2004
 Gender Inclusivity Seminar, 1992
 The African-American Experience: A Framework for Integrating American History: An
 Institute for High School Teachers of History, instructor 1992, 1994
 Faculty Advisor for UIUC Law School Humanities Teaching Program, 1998-99
 Senior Faculty Mentor, LAS Teaching Academy, 1999-2008

Service - Department of History UI:

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Lincoln Bicentennial Committee, Chair, 2005-06, co-Chair 2006-08
 Department Distance Learning and Global Campus committee, 2007-08
 Carnegie Initiative on the Doctorate, 2003-05
 Ethical Conduct Liaison, 2004-05
 Phi Alpha Theta Faculty Advisor, 2005-06
 Graduate Placement Officer, 1990, 1991-94, 1997-99
 Graduate Admissions Officer, 1990-91
 Graduate Committee, 1990-93
 Organizer of OAH Breakfast Meeting, 1989-90, 1993-94
 Computer Resources, 1976-88, 1989-91, 1995-99, Chair 1976-85, 1997-99
 Teaching Awards, 1986-88, 1992-93, 1997-98, 1999-2000, Chair, 1987-88, 1997-98, 1999-2000
 T.A. Evaluation, 1975-76, 1978-82, 1984-88, 1990-91, 1995, 1998-99, 2002, 2005-06
 Speakers and Colloquia, 1981-82
 Grants and Funding, 1981-82
 Capricious Grading, 1985-86, 2002-03
 Social Science History Committee, 1980
 Advisor, History Undergraduate Club, 1976-78
 Swain Publication Prize Essay Committee, 1991
 Proposal-Writing Workshop, 1991-92, 2002
 Teaching Workshop, 1993
 Chair Library Committee, 1996-97
 Faculty Advisor for Phi Alpha Theta, 2005-06
 American History Search Committee, 1991-92
 Chair, American History Search Committee, 1993-94
 James G. Randall Distinguished Chair Search Committee, 1999-2000

Service Coastal Carolina University:

Search committee for Archaeologist, 2008-09
 Selection Committee for Clark Chair of History, 2010
 Third Year Assistant Professor Faculty Review Committee, 2010

A more complete list of Service and Public Engagement is available upon request.

Conferences Organized (selected list):

In 1978, I (with Robert C. McMath, Jr.) organized and chaired a National Endowment for the Humanities Conference on Southern Communities at the Newberry Library. In 1993, I organized, hosted, and chaired the annual meeting of the Conference on Computing for the Social Sciences at the National Center for Supercomputing Applications. In 1999, I organized and hosted the 12th Annual Meeting of the Southern Intellectual History Circle (SIHC) in Edgefield and Ninety Six, S.C, and again hosted SIHC for its 16th Annual meeting in 2004 at the College of Charleston, and the 2013 meeting in Edgefield. In 2001, I organized a workshop and conference on diversity and racism in the classroom with Carnegie Scholars at The Citadel in Charleston, S.C. In 2001, I organized a South Carolina Humanities Council Edgefield Summit History Conference. In January 2003, I organized a Workshop on Diversity and Racism and a Conference on the Scholarship of Teaching and Learning, both at the University of Illinois. In March 2003 I organized The Citadel Conference on the South: “The Citadel Symposium on the Civil Rights Movement in South Carolina.” I organized the Humanities, Arts, Science, and

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Technology Advanced Collaboratory (HASTAC) meeting in January 2004 in Washington, D.C. I organized and hosted a Humanities Computing Summit in August 2004 at NCSA and UIUC. In 2005, I planned and hosted the British American Nineteenth Century History (BrANCH) Conference in Edgefield, South Carolina and a symposium honoring Jim McPherson's retirement in April 2005 in Princeton. As program chair I helped organize the Southern Historical Annual meeting in Atlanta in November 2005. In 2011, I organized a conference in honor of Charles Joyner, *Writing the South in Fact, Fiction, and Poetry*, at Coastal Carolina University. In 2013, I organized a conference honoring F. Sheldon Hackney at Martha's Vineyard. On Nov. 28-Dec 1, 2018, I organized and hosted an international conference on "Lincoln's Unfinished Work," and on the afternoon of Dec. 2 directed a workshop for teachers on how to teach about the history of race in South Carolina k-12 schools. As Director of I-CHASS, I regularly organized conferences and workshops, at least two major conferences a year such as "Computing in Humanities, Arts, and Social Sciences" (2005), "Spatial Thinking in the Social Sciences and Humanities" (2006), and the "e-Science for Arts and Humanities Research: Early Adopters Forum" (2007). In 2007 we hosted the annual international meeting of The Alliance of Digital Humanities Organizations including The Association for Computers and the Humanities. As Director of the Clemson CyberInstitute, I regularly organized workshops, brownbags, conferences, and meetings. And as Executive Director of the College of Charleston Atlantic World and Lowcountry (CLAW) Program, I regularly work with others to organize conferences and meetings.

Reviews:

I have reviewed books for numerous journals and book manuscripts for numerous presses. In addition, I have refereed article manuscripts for numerous journals. I have also reviewed proposals for various granting agencies. I have also reviewed and written outside letters of recommendation for promotion, tenure, and endowed chair decisions for more than a hundred cases at various colleges and universities. Lists of these reviews, presses, journals, universities, and granting agencies are available upon request.

Invited lectures and conference participation available upon request. Selected invited lectures include those such as the President Bill Clinton endowed lecture in American History at the New York Historical Society March 9, 2022. Other invited lectures include at Harvard University, Princeton, Columbia University, Dartmouth, Cornell University, University of Pennsylvania, Black Congressional Caucus on Lincoln (2009), Printers Row Book Fair, Society of Civil War Historians, Society of Historians of Early America, Abraham Lincoln Bicentennial Commission (ALBC), Atlanta Town Hall meeting on Race at Morehouse College and at Jimmy Carter Presidential Library Center, the Crown Forum Martin Luther King, Jr. lecture at Morehouse College, Western Illinois University, Drake University, University of Illinois Law School, Union League Club of Chicago, Association of Archivists and Librarians, CASC, University of Georgia, Lawrence University, Wisconsin Lincoln Bicentennial, University of Wisconsin at Milwaukee, University of Wisconsin at Madison, University of Wisconsin at Eau Claire, University of Kansas, Samford University, Talladega University, ALBC Morrill Act Conference, Arkansas State University, San Francisco State University, Lewis University, Notre Dame, University of Oklahoma, University of Florida, University of Southern Florida, Florida State University, University of South Carolina, South Carolina State University, North Greenville University, Anderson University, Augusta State University, Auburn University, Mercer University, American Historical Association, Organization of American Historians, Southern Historical Association, Agricultural History Society, Wheaton College, University of Illinois, Florida Atlantic University, Lincoln College, Claflin University, Francis Marion University, Policy Studies Association, Southern Studies Association Meeting (regional affiliate of

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American Studies Association), Association for the Study of African American Life and History (ASALH), Penn Center, Coastal Carolina University, Virginia Polytechnic Institute and State University (Virginia Tech), South Carolina Historical Society, South Carolina Department of Archives and History Civil War Symposium, Supercomputing11 (Seattle), History Miami, William Patterson University, USC Upstate, University of Hawaii, University of North Carolina at Charlotte, University of North Carolina at Chapel Hill, The Lincoln Forum, Abraham Lincoln Presidential Library and Museum, Furman University, Berry College, High Noon series at S.C. Upstate Museum, Erskine College, Mississippi State University, University of Chicago, Stanford University, University of Manchester, Cambridge University, Edinburg University, University of London, Oxford University.

Samples of recognition given to me or my work:

The Chronicle of Higher Education, Vol. L: 2 (September 5, 2003), cover page, A37-38. Online at <http://chronicle.com/prm/weekly/v50/i02/02a03701.htm>

C. Vann Woodward, "District of Devils," *New York Review of Books*, xxxii #15: 30-31

Randall Kennedy, "More Foe Than Friend: The Supreme Court and the pursuit of racial equality," *The Nation*, August 8, 2021.

Chicago Tribune, October 13, 2007, cover of the Book Review Section, "Orville Vernon Burton's Heartland Prize-winning *The Age of Lincoln*." Catherine Clinton, "Lincoln and His Complex Times," pp. 4-5; Cover page 1988 on *In My Father's House*

Washington Post, Hannah Natanson, "Lincoln's forgotten legacy as America's first 'green president'" in the *Washington Post* on Feb. 16, 2020

(<https://www.washingtonpost.com/.../lincoln-green-president-e.../>)

USA Today, February 25, 2010, Larry Bleiberg, 10 Civil Rights Sites You Should See before Black History Month Comes to a Close,"

<https://www.usatoday.com/story/travel/destinations/10greatplaces/2020/02/25/black-history-month-10-civil-rights-sites-you-should-check-out/4832666002/>

Featured as example of "Faculty Excellence" on UIUC Homepage:

<http://www.uiuc.edu/overview/explore/>

Call out in Sonia Sotomayor, *My Beloved World* (NY: Alfred A. Knopf, 2013), p. 132, and her Commencement Address at the University of South Carolina, 2011 (on C-Span) and "Supreme Court Justice Sonia Sotomayor uses vivid examples from two key figures in her life—her mother and South Carolina native and historian [Vernon Burton](#)"; Wayne Washington, "You Learn Values from Your Family, Supreme Court Justice Tells Grads," *The Columbia State*, May 9, 2011;

<http://www.thestate.com/2011/05/07/1808978/sotomayor-parents-are-key.html#storylink=misearch#ixzz1NljBBgHA> and

<http://dailygamecock.com/news/item/1422-sonya-sotomayor-delivers-personal-inspiring-message-at-university-of-south-carolina-graduation>; and at Clemson 2017 with Supreme

Court Justice Sonia Sotomayor, <https://www.youtube.com/watch?v=Sn3GbXen58c>;

<https://www.youtube.com/watch?v=zq1LAQmHh0I> (4 April 1992 on history and high performance computing);

The South Carolina Encyclopedia Guide to South Carolina Writers. Edited by Tom Mack (Columbia: University of South Carolina Press, 2014), pp. 33-35 (SC Humanities)

In last few years, numerous international, national and local television, radio interviewed me (especially about the murders at Mother Emanuel in Charleston and the removal of the Confederate battle flag from the statehouse grounds). A number of interviews about the Voting Rights Act (VRA) or Voter ID, for example, Congressional Briefing on the Voting Rights Act (2015), [Voting Rights Act 1965, Dec 4 2015 | Video | C-SPAN.org](#) and [Historians Expert](#)

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[Witnesses Civil Rights, Jan 7 2017 | C-SPAN.org](#), NPR—for example, June 27, 2013, “On Point” discussing the Supreme Court Ruling on VRA, Sections 4 and 5--
<http://onpoint.wbur.org/2013/06/27/scotus-voting-rights>; and <http://wbur.fm/138DolQ>, and NPR and BBC, see for example recently, Jorge Valenca, Feb. 26, 2020, “The Abroad Primary,” ([For overseas voters, a primary of their own](#) www.pri.org › stories › overseas-voters-primary-their-o...) and commercial, and other media interviews and programs, including several C-SPAN Book TV (for example, “President Lincoln and Secession,” <http://www.c-spanvideo.org/program/293631-3>) and a two-hour Clemson University lecture on Southern Identity at “Lectures in History,” <http://www.c-span.org/History/> – downloaded 492,791 times in first year after it debuted October 25, 2012. Numerous appearances on SC ETV for documentaries. In Feb., 2019 the Clemson Area Pledge to End Racism (CAPER) began using a training video featuring Vernon Burton m (Video on youtube at ([CAPER Burton Video](#)). Power of Perspective Panel, “Independence Day: Land of the Free?” (<https://www.clemson.edu/centers-institutes/gantt/multicultural-programs/educational-programming.html> Scroll down the Power of Perspective Panel Series tab), July 9, 2020); Aug. 24, 2020, first virtual Lincoln Cottage’s Scholar Session. “Dr. Vernon Burton and Dr. Edna Greene Medford discuss the lasting meaning and impact of Confederate iconography with our members: (<https://www.youtube.com/watch?v=uNbG5Odagg&feature=youtu.be>; and (<https://www.c-span.org/video/?475387-1/confederate-monuments-memorials>)). May 2021, commentator on the *Last Rice River*, a half-hour experience examining the rise and fall of the Rice Kingdom on South Carolina’s Combahee River, which went public this month ([here](#)); “South Carolina Between World Wars (www.npr.org/podcasts/381444475/walter-edgar-s-journal?fbclid=IwAR1vw_xMxe3L36oRXNLunDdfYt8u9wUJjJ1qnWez1eguRzBpw1B8j4mhu4) and “Rediscovered Ancestry: a Family Learns the Story of Their Remarkable Ancestor, Senator Lawrence Cain. <https://www.southcarolinapublicradio.org/show/walter-edgars-journal/2021-04-12/rediscovered-ancestry-a-family-learns-the-story-of-their-remarkable-ancestor-senator-lawrence-cain>,” both interviewed by Walter Edgar, for Walter Edgar’s Journal, *South Carolina Public Radio*, Columbia, SC, Jan. 13, 2020, Apr. 12, 2021; guest for Dr. James Howell’ Bible study on “Lincoln and the Bible,” at Myers Park United Methodist Church, Charlotte, available at https://www.facebook.com/watch/live/?v=1322571451267316&ref=watch_permalink; interview “Southern History, Influence and Tradition ” with Dr. James Howell on the series “Maybe I’m Amazed.” (<https://podfollow.com/1497598414/episode/eb3f38a51902c7934a090355abb3af200256e2ad/view>); and James Howell, “What a timely and important podcast I recorded just yesterday: Prof. Vernon Burton on “Race and the Supreme Court”! Give it a listen, great stuff - an incredible survey of the thousands of cases involving race before the Court, and why it matters for today's hearings, voter rights and more. Here or wherever you get podcasts: <https://podcasts.apple.com/.../maybe-im-amazed/id1497598414>; “Juneteenth: Reflecting on the Past to Understand Today” June 18, 2020 to Lawrence Livermore National Laboratory in Livermore California (<https://www.llnl.gov>). The lecture can be found at <https://youtu.be/6u60Pu5KVY4>; “Reparations and World Change,” June 19, 2020. Thurgood Marshall Law School @ at <https://youtu.be/7hgl8bS1G8E>; “Confederate Monuments Continue to Come Down in Racial Justice Protests,” interviewed by Jeremy Hobson, “Here and Now,” *NPR*, Boston, MA: WBUR, June 19, 2020. <https://www.wbur.org/hereandnow/2020/06/19/confederate-monuments-come-down>. (more complete list available upon request, and see more listed under author and under other resources at <http://justice-deferred.clemson.edu>)

EXHIBIT 5

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ANNIE LOIS GRANT, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:22-CV-00122-SCJ

EXPERT REPORT OF JOHN B. MORGAN

Pursuant to 28 U.S.C. § 1746, Fed. R. Civ. P. 26, and F.R.E. 702 and 703, I, JOHN B. MORGAN, make the following declaration:

1. My name is John B. Morgan. 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 hold a B.A. in History from the University of Chicago. As detailed in my CV, attached as Exhibit 1, I have extensive experience over many years in the field of redistricting. I have worked on redistricting plans in the redistricting efforts following the 1990 Census, the 2000 Census, the 2010 Census and the 2020 Census. I have testified as an expert witness in demographics and redistricting.

3. I am being compensated at a rate of \$325 per hour for my services in this case.

4. The redistricting geographic information system (GIS) software package used for this analysis is Maptitude for Redistricting 2021 from Caliper Corporation. The redistricting software was loaded with the census PL94-171 data from the Census Bureau and the census geography for Georgia. I was also provided with election data files used by the Georgia General Assembly during the redistricting process. The full suite of census geography was available, including counties, places, voting districts, water bodies, and roads, as well as census blocks, which are the lowest level of geography for which the Census Bureau reports population counts. Census blocks are generally bounded by visible features, such as roads, streams, and railroads and they can range in size from a city block in urban and suburban areas to many square miles in rural areas.

5. I have been asked to review the House of Representatives and State Senate plans considered and adopted by the Georgia General Assembly and compare them to the proposed House and Senate plans drawn by Mr. Esselstyn and offer opinions regarding my analysis.

6. As a result of this analysis my opinion is that the Esselstyn 1205 Senate and House plans are focused on race, prioritizing race to the detriment of traditional redistricting factors.

Data utilized for analysis

7. A House and Senate plan was submitted for a preliminary injunction hearing, earlier in this case (I am designating these as PI plans). A House and Senate plan were submitted in Mr. Esselstyn's expert report in this case on December 5, 2022 (I am designating these as 1205 plans).

8. In preparing this analysis, I was given the block-equivalency files of the Esselstyn plans as well as the block-equivalency files of the 2021 adopted plans and incumbent databases used by the Georgia General Assembly during the redistricting process. The incumbent databases list the address locations and districts of the Representatives and Senators serving under the existing House (2015-enacted) and Senate (2014-enacted) plans prior to the election of 2022. I was also given information on incumbents who were not intending to run for re-election to their current offices in 2022.

9. I loaded the 2021 House and 2021 Senate plans enacted by the Georgia General Assembly into the Maptitude for Redistricting software using the block-equivalency files provided. I loaded the Esselstyn House plans and the Esselstyn

Senate plans into the Maptitude for Redistricting software using the block-equivalency files provided. I loaded the prior House (2015-enacted) and Senate (2014-enacted) plans into the Maptitude for Redistricting software using files provided with software. I loaded the associated incumbent databases provided.

10. Using the Maptitude for Redistricting software, I ran seven reports for each 1205 Esselstyn plan:

- 1- Measures of compactness report,
- 2- Districts & incumbents report,
- 3- Population summary report,
- 4- Political subdivision splits report,
- 5- Plan component report,
- 6- Core constituency report compared to PI plan,
- 7- Core constituency report compared to Enacted 2021 plan.

11. Each report is included in the appendices to this report as exhibits 2-15. I previously created these reports for the enacted plans that are included in my December 5, 2022 expert report. I also created population summary reports for the PI plans.

12. I also created a series of maps comparing the 1205 plans and the enacted plans. These maps show a theme of AP-Black % on the voting districts and overlays

of selected districts in the enacted plans and the 1205 plans for comparison. Each of these maps for the Senate is included as Exhibits 16-35 and each of these maps for the House is included as Exhibits 36-46.

State Senate Plan Analysis

13. Using the Population summary reports, I tallied the number of majority-Black districts using any-part Black voting age population (18+ AP-Black) for each Senate plan. The chart below shows the total number of majority-Black districts in the 2021 adopted Senate plan, the Esselstyn 1205 Senate plan and the Esselstyn PI Senate plan, as well as the number of districts in the percentage ranges using the any-part Black voting age population.

Chart 1: Number of Majority-Black Senate Districts.

Majority-Black Senate Districts			
% AP Black VAP	2021 Adopted Plan	Esselstyn Plan 1205	Esselstyn Plan PI
Over 75%	0	0	0
70% to 75%	3	1	1
65% to 70%	3	2	2
60% to 65%	3	3	4
55% to 60%	3	5	4
52% to 55%	1	3	3
50% to 52%	1	3	3
Total # Districts	14	17	17

14. The 2021 adopted Senate plan includes 14 majority-Black districts, the Esselstyn 1205 Senate plan includes 17 majority-Black districts, and the Esselstyn PI Senate plan has 17 majority-Black districts.

15. The plan drafted by Mr. Esselstyn (1205) differs slightly from the plan submitted previously for the preliminary injunction hearing in this case. There are changes affecting four districts: Districts 17 and 23 exchange population, and 16 and 34 exchange population.

16. Below is a chart which summarizes the changes between the two plans.

Chart 2: Changes from Esselstyn Sen PI to Esselstyn Sen 1205

District	Esselstyn Sen 1205 Population	Esselstyn Sen 1205 dev	Esselstyn Sen PI Population	Esselstyn Sen PI dev	Pop. Diff	Pop. % Diff	Esselstyn Sen 1205 % AP Black VAP	Esselstyn Sen PI % AP Black VAP
16	190077	-0.63%	193863	1.35%	-3786	-2.0%	19.7%	19.3%
34	192023	0.39%	188237	-1.59%	3786	2.0%	59.0%	60.2%
17	193838	1.34%	189212	-1.08%	4626	2.4%	21.8%	21.7%
23	188095	-1.67%	192721	0.75%	-4626	-2.5%	51.1%	50.4%

17. Senate District 16 exchanges population with Senate District 34, resulting in a deviation that moves from +1.35% to -0.63% and an 18+ AP Black % that moves from 60.2% to 59.0%.

18. District 34 exchanges population with District 16, resulting in a deviation that moves from +1.59% to +0.39% and an 18+ AP Black % that moves from 19.3% to 19.7%.

19. In another part of the state, Senate District 17 exchanges population with Senate District 23, resulting in a deviation that moves from +1.08% to +1.34% and an 18+ AP Black % that moves from 21.7% to 21.8%.

20. District 23 exchanges population with District 17, resulting in a deviation that moves from +0.75% to -1.67% and an 18+ AP Black % that moves from 50.4% to 51.1%. In this exchange, both districts 17 and 23 show an increase in 18+ AP Black %. While that might not seem possible from a logical point of view, is possible because the deviation of Senate District 23 is lowered to the make it the lowest deviation in the entire plan at -1.67%. Having a lower total population, but approximately the same AP Black population results in a higher AP Black %.

21. Looking more closely at the Esselstyn Senate 1205 plan, here is a chart that summarizes top-line statistics about the plan and compares them to the enacted plan.

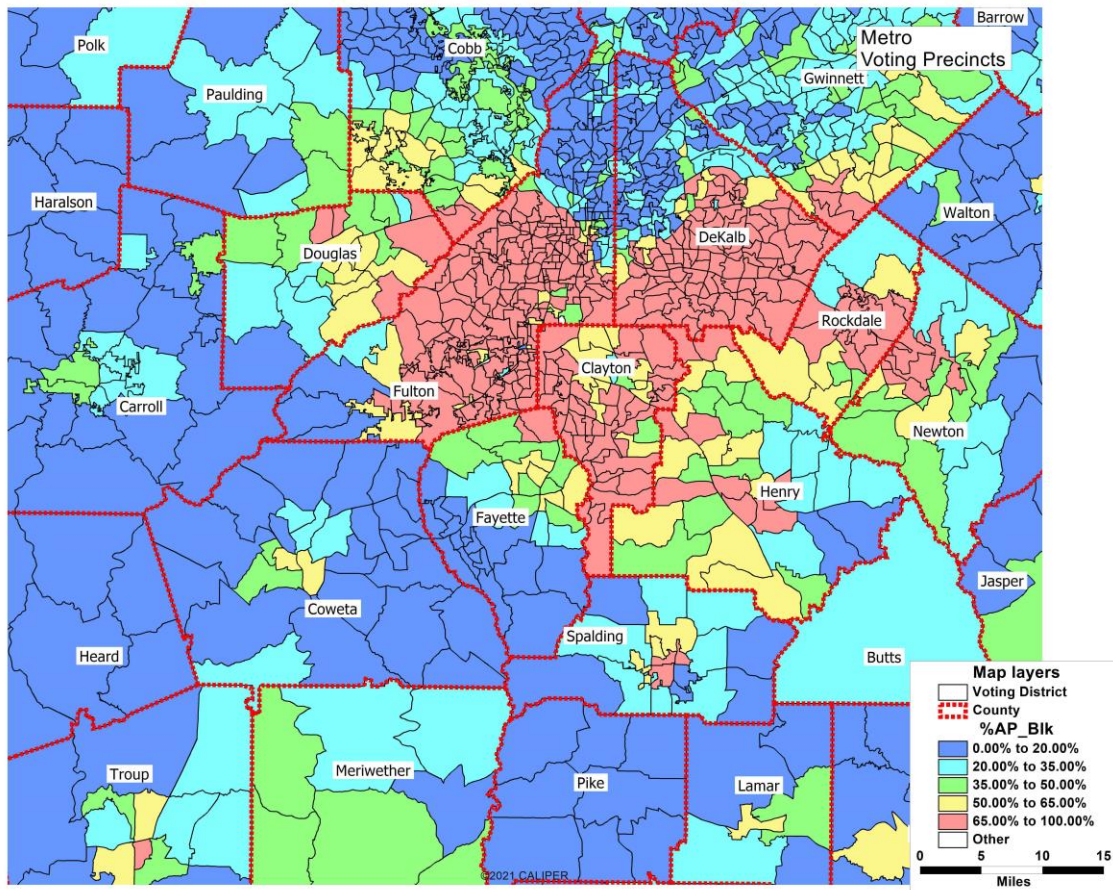
Chart 3: Esselstyn 1205 Senate and Enacted Senate Plan comparisons

Plan metrics	Esselstyn Senate 1205	Enacted Senate
County splits	34	29
Voting precinct splits	49	47
Mean compactness - Reock	0.41	0.42
Mean compactness - Polsby Popper	0.28	0.29
# Paired incumbents	6	4
# Seats majority 18+_AP_Blk%	17	14
Deviation relative range	-1.67% to +1.90%	-1.03% to +0.98%
Deviation overall range	3.57%	2.01%

22. In addition to the overall plan metrics in the chart above, the Core constituency report (Ex. 8) shows that the Esselstyn 1205 Senate plan has 34 districts that are exactly the same as the enacted Senate plan. With 34 of 56 districts exactly the same, it is not surprising that the Esselstyn 1205 Senate plan has mean compactness scores close to, but still lower than the enacted Senate plan.

23. The Esselstyn 1205 Senate plan changes 22 districts to create three new Black-majority Senate districts.

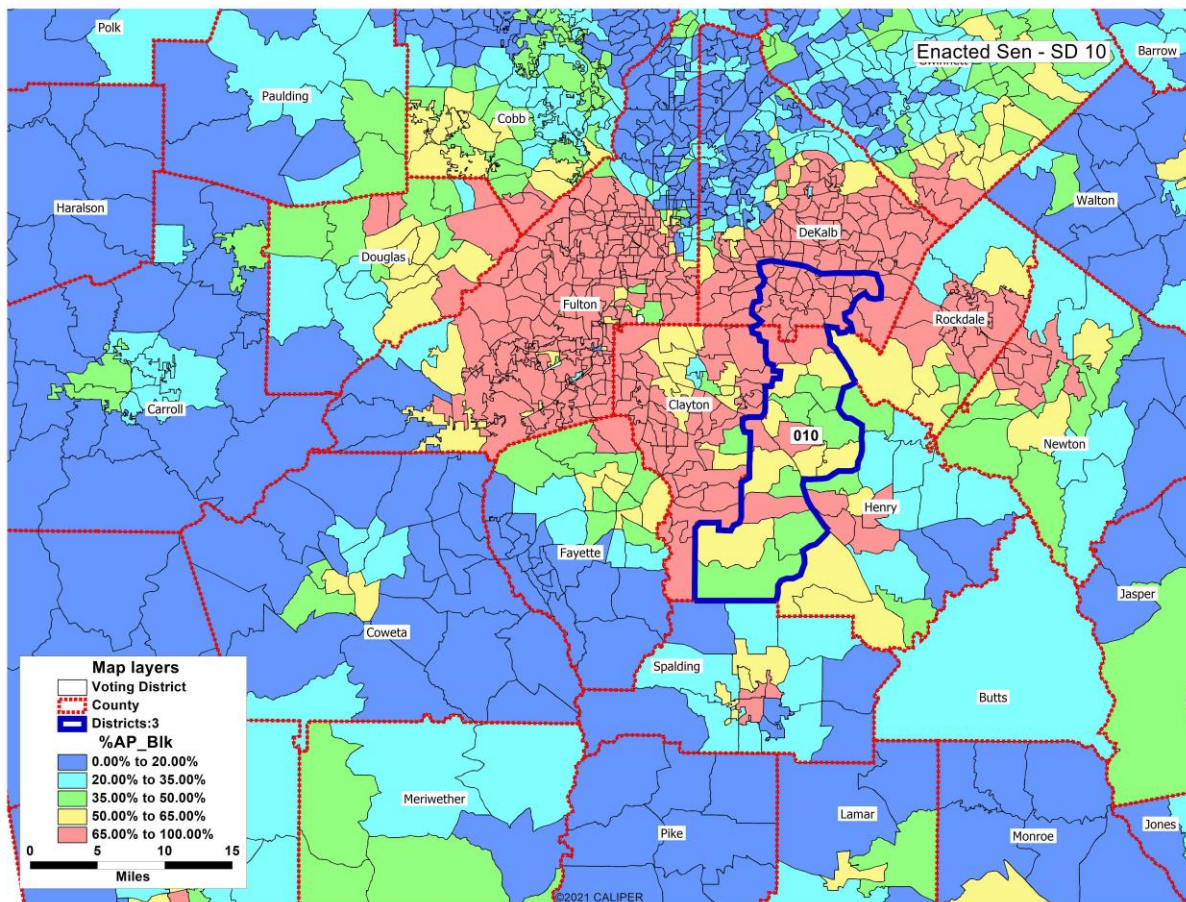
24. Below is a map showing the Metro region with a theme of AP-Black % on the voting districts, as well as maps of Senate District 10 in the Enacted Senate plan and the Esselstyn 1205 Senate plan.



25. Voting districts themed in red have an AP-Black % of greater than 65% and voting districts themed in yellow have an AP-Black % of 50% to 65%. Voting districts themed in green have an AP-Black % of 35% to 50%; light blue have an AP-Black % of 20% to 35%; and darker blue have an AP-Black % of less than 20%.

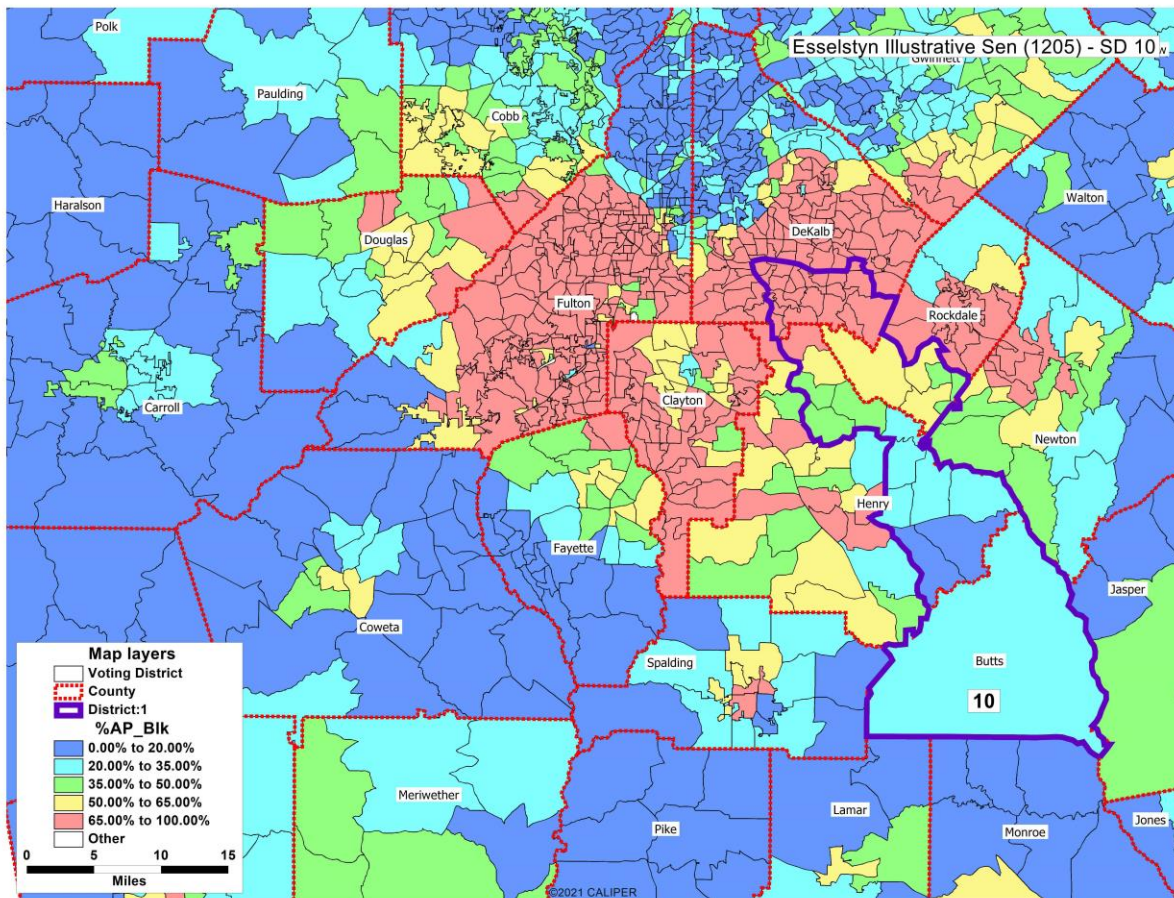
26. Senate District 10 in the enacted plan is anchored in heavily Black southern DeKalb County (Stonecrest area) and follows the western boundary of Henry County down to its southern border with Spalding County. This district has

a Reock compactness score of 0.28 and a Polsby-Popper compactness score of 0.23 and the district is 71.46% 18+AP Black. It is comprised of parts of two counties and measures 25 miles from north to south.



27. In comparison, Senate District 10 in the Esselstyn 1205 Senate plan is anchored in heavily Black southern DeKalb County (Stonecrest area) and stretches through Rockdale County and Henry County to pick up predominantly white Butts County. The construction of Senate District 10 splits a portion of Rockdale County

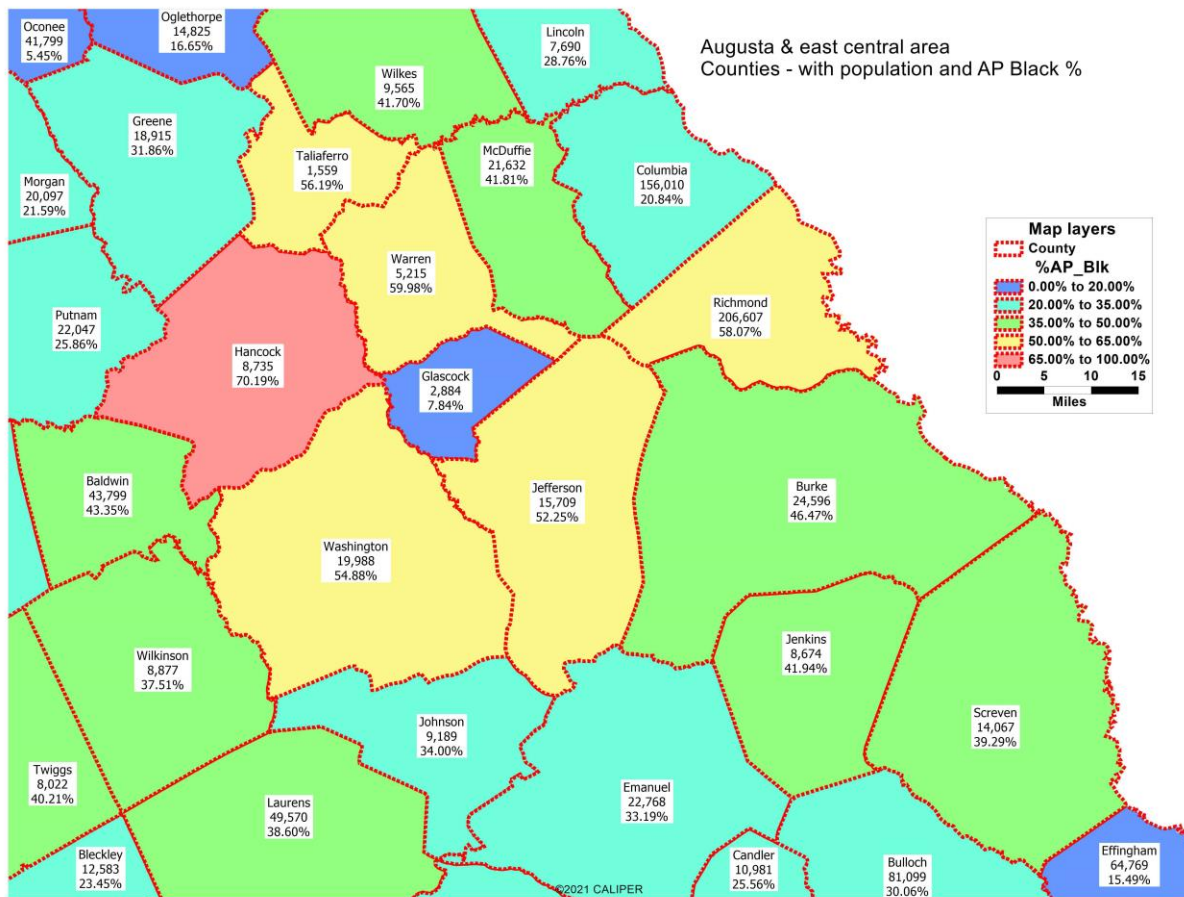
and strategically avoids much of the Black population in Henry County (the portion of Henry County in SD 10 is only 35.1% 18+ AP Black %). This district has a Reock compactness score of 0.25 and a Polsby-Popper compactness score of 0.19 and the district is 61.1% 18+AP Black. It is comprised of parts of four counties and measures 43 miles from north to south.



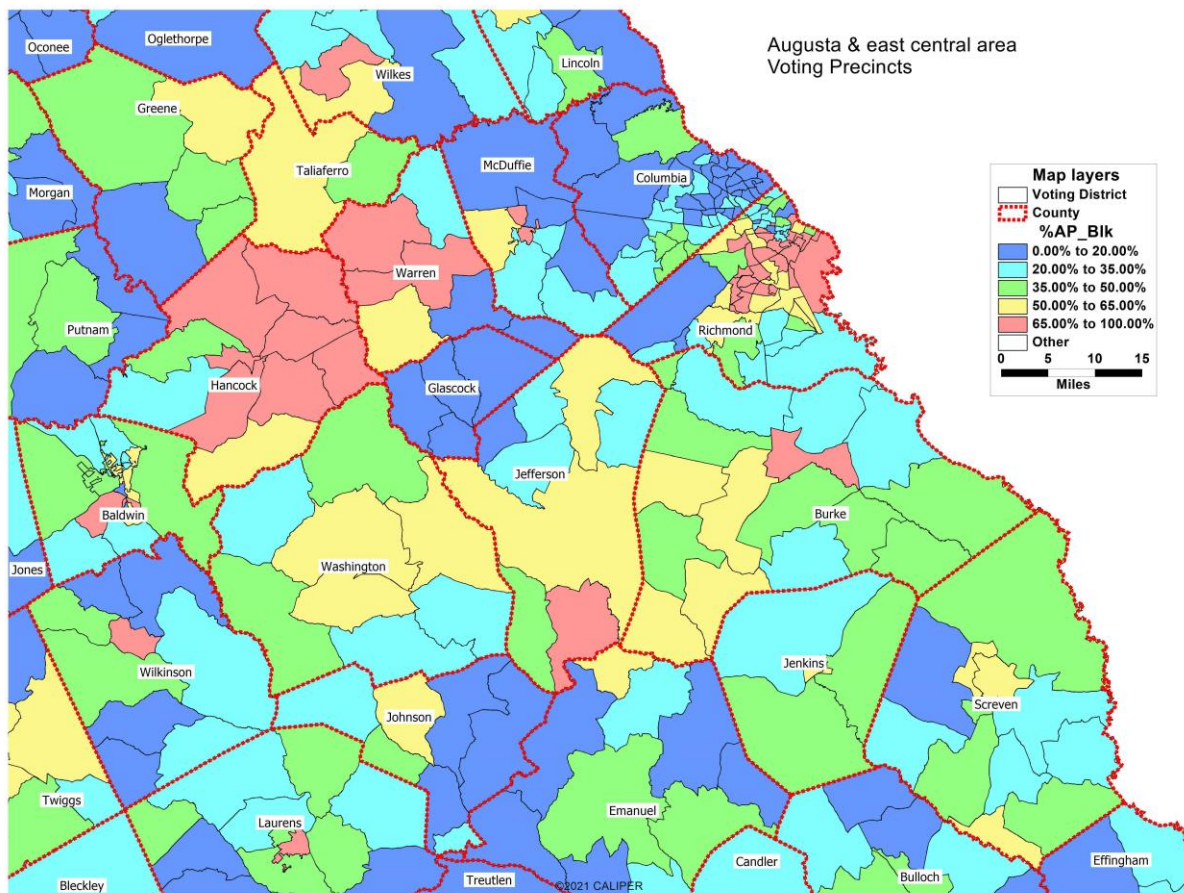
28. Looking at specific districts (as above) shows that the compactness of the districts is impacted by the efforts to create more majority Black districts. The

Black percentage is lowered only by elongating the district to include lower concentrations of Black population. This allows the Black population to be redistributed and to create other majority Black districts.

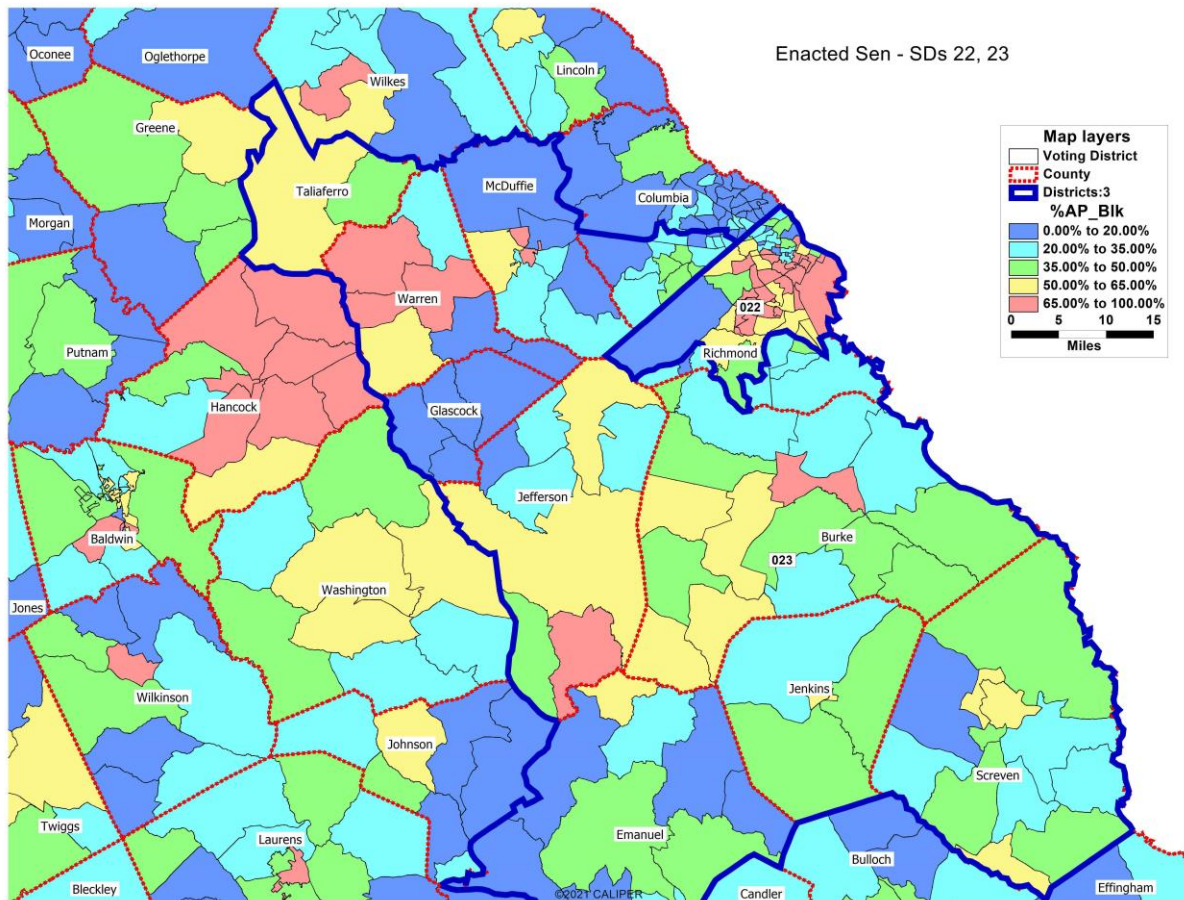
29. Below is a map showing Augusta and the East Central region with a theme of AP-Black % on the counties. The map shows that Richmond County (Augusta) has a majority of AP-Black population. At over 200,000 in population, Richmond County has more than enough population for a Senate district. The map also shows some majority AP-Black population counties, which are not very populous, to the west of Augusta – Washington, Jefferson, Hancock, Warren and Taliaferro.



30. A similarly themed map on the voting districts shows concentrations of Black population in the region.

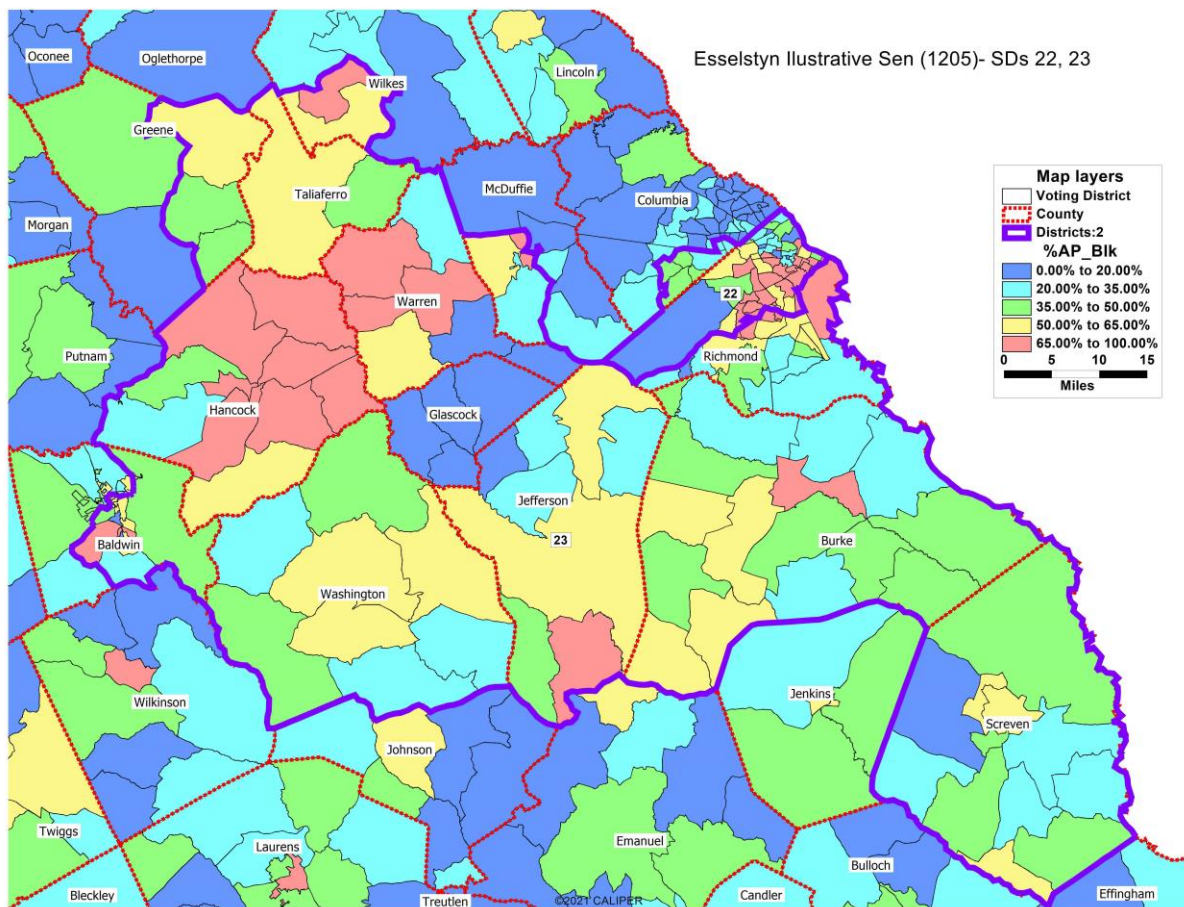


31. Senate District 22 in the enacted plan is drawn entirely within Richmond County. Enacted Senate District 22 has a Reock compactness score of 0.41 and a Polsby-Popper compactness score of 0.29 and the district is 56.5% 18+AP Black. In the enacted plan, the balance of Richmond County is placed in Senate District 23 along with a portion of Columbia County and nine whole counties. Enacted Senate District 23 has a Reock compactness score of 0.37 and a Polsby-Popper compactness score of 0.16 and the district is 35.48% 18+AP Black.



32. In order to change the racial makeup of Senate Districts 22 and 23, the Esselstyn 1205 Senate plan pushes part of SD 22 out of Richmond County into Columbia County. The Esselstyn 1205 Senate plan strategically utilizes the Black population in Columbia County, selecting the highest-concentration AP-Black population voting districts close to the county border in order to keep SD 22 above 50% 18+AP Black population. By moving SD 22 into Columbia County, stronger

concentrations of Black population in Richmond County can be transferred into Senate District 23.



33. The construction of Senate District 23 in the Cooper 1205 Senate plan splits Wilkes, Greene, McDuffie and Baldwin Counties, taking the lion's share of Black population in each of those counties into the district. The map shows that the boundary of Senate District 23 follows the contours of the underlying high concentrations of Black population within voting precincts. Senate District 23

connects many separate enclaves of Black population from these split counties, including Milledgeville in Baldwin County, which measures more than 80 miles away from the eastern part of the district in Augusta. The chart below shows that the counties are split such that the portion with higher concentrations of Black population is in SD 23 and the portion with lower concentrations of Black population is outside the district.

Chart 4: Counties split in Esselstyn Senate 1205 SD 23

Split County	Pop.	AP Black Pop.	VAP	AP Black VAP	% AP Black VAP
Baldwin (in 23)	26833	13267	22274	10300	46%
Baldwin (outside 23)	16966	5718	13458	4215	31%
Greene (in 23)	4747	2373	3666	1772	48%
Greene (outside 23)	14168	3654	11692	2698	23%
McDuffie (in 23)	12164	7350	9042	5130	57%
McDuffie (outside 23)	9468	1695	7573	1295	17%
Richmond (in 23)	47851	28212	36201	20443	56%
Richmond (outside 23)	158756	91758	124698	67487	54%
Wilkes (in 23)	3747	2465	2873	1840	64%
Wilkes (outside 23)	5818	1524	4778	1231	26%

34. As discussed earlier in this report, Esselstyn 1205 Senate district 23 has the lowest population deviation at -1.67% and this deviation has an effect on the 18+AP Black population in the district. Senate District 23 also has the most split counties of any district in the plan at five split counties.

35. The chart below compares the split counties in both the Enacted and Esselstyn 1205 Senate plans as well as some demographic data for those counties. The enacted Senate plan splits 29 counties and the Esselstyn 1205 Senate plan splits 34 counties. Both plans split the same 27 counties.

Chart 5: County splits Enacted SD vs Esselstyn 1205

County	Population	AP Blk	AP Blk %	18+ Pop	18+ AP Blk	18+ AP Blk %	Split in Enacted Senate	Split in Esselstyn Sen 1205
Barrow	83,505	11,907	14.3%	62,195	8,222	13.2%	X	X
Bartow	108,901	13,395	12.3%	83,570	9,377	11.2%	X	X
Chatham	295,291	115,458	39.1%	234,715	85,178	36.3%	X	X
Cherokee	266,620	21,687	8.1%	202,928	14,976	7.4%	X	X
Clarke	128,671	33,672	26.2%	106,830	24,776	23.2%	X	X
Clayton	297,595	216,351	72.7%	220,578	158,854	72.0%	X	X
Cobb	766,149	223,116	29.1%	591,848	166,141	28.1%	X	X
Coffee	43,092	12,575	29.2%	32,419	9,191	28.4%	X	X
Columbia	156,010	32,516	20.8%	114,823	22,273	19.4%	X	X
DeKalb	764,382	407,451	53.3%	595,276	314,230	52.8%	X	X
Fayette	119,194	32,076	26.9%	91,798	23,728	25.8%	X	X
Floyd	98,584	15,606	15.8%	76,295	11,064	14.5%	X	X
Forsyth	251,283	13,222	5.3%	181,193	8,751	4.8%	X	X
Fulton	1,066,710	477,624	44.8%	847,182	368,635	43.5%	X	X
Gordon	57,544	2,919	5.1%	43,500	1,939	4.5%	X	X
Gwinnett	957,062	287,687	30.1%	709,484	202,762	28.6%	X	X
Hall	203,136	17,006	8.4%	153,844	12,094	7.9%	X	X
Henry	240,712	125,211	52.0%	179,973	89,657	49.8%	X	X
Houston	163,633	56,520	34.5%	122,118	39,605	32.4%	X	X
Jackson	75,907	6,148	8.1%	56,451	4,268	7.6%	X	X
Muscogee	206,922	102,212	49.4%	157,052	74,301	47.3%	X	X
Newton	112,483	55,901	49.7%	84,748	40,433	47.7%	X	X
Paulding	168,661	41,296	24.5%	123,998	28,164	22.7%	X	X
Richmond	206,607	119,970	58.1%	160,899	87,930	54.6%	X	X
Walton	96,673	18,804	19.5%	73,098	13,165	18.0%	X	X
Ware	36,251	11,421	31.5%	27,788	8,226	29.6%	X	X
White	28,003	721	2.6%	22,482	484	2.2%	X	X
Bibb	157,346	88,865	56.5%	120,902	64,270	53.2%	X	
Douglas	144,237	74,260	51.5%	108,428	53,377	49.2%	X	

County	Population	AP Blk	AP Blk %	18+ Pop	18+ AP Blk	18+ AP Blk %	Split in Enacted Senate	Split in Esselstyn Sen 1205
Baldwin	43,799	18,985	43.3%	35,732	14,515	40.6%		X
Coweta	146,158	28,289	19.4%	111,155	20,196	18.2%		X
Greene	18,915	6,027	31.9%	15,358	4,470	29.1%		X
McDuffie	21,632	9,045	41.8%	16,615	6,425	38.7%		X
Rockdale	93,570	57,204	61.1%	71,503	41,935	58.6%		X
Wilcox	8,766	3,161	36.1%	7,218	2,693	37.3%		X
Wilkes	9,565	3,989	41.7%	7,651	3,071	40.1%		X
TOTAL							29	34

36. In comparison to the enacted senate plan, the Esselstyn 1205 Senate plan makes two counties whole (Bibb and Douglas counties) but introduces seven new county splits (Baldwin, Coweta, Greene, McDuffie, Rockdale, Wilcox and Wilkes counties). Four of the seven additional county splits are directly due to Senate District 23. All seven additional split counties are attributable to the effort to create new majority Black districts.

37. Based on my analysis of the Esselstyn 1205 Senate plan, the impact of engineering more majority Black districts can be seen in the overall plan metrics and the differences from the enacted plan. Further, my analysis of the traditional redistricting factors – maintaining communities and traditional boundaries, compactness, and deviation - along with the manipulation of the boundaries of the new AP-Black districts, supports my opinion that the Esselstyn 1205 Senate plan is focused on race, prioritizing race to the detriment of traditional redistricting factors.

State House Plan Analysis

38. Using the Population summary reports, I tallied the number of majority-Black districts using any-part Black voting age population for each House plan. The chart below shows the total number of majority-Black districts in the 2021 adopted House plan, the Esselstyn 1205 House plan and the Esselstyn PI House plan, as well as the number of districts in the percentage ranges using the any-part Black voting age population.

Chart 6: Number of Majority-Black House Districts

Majority-Black House Districts			
% AP Black VAP	2021 Adopted Plan	Esselstyn Plan 1205	Esselstyn Plan PI
Over 75%	2	2	2
70% to 75%	9	5	5
65% to 70%	7	8	8
60% to 65%	8	8	8
55% to 60%	11	9	10
52% to 55%	10	12	10
50% to 52%	2	10	11
Total # Districts	49	54	54

39. The 2021 adopted House plan includes 49 majority-Black districts, the Esselstyn 1205 House plan includes 54 majority-Black districts, and the Esselstyn PI House plan has 54 majority-Black districts.

40. The House plan drafted by Mr. Esselstyn (1205) differs slightly from the House plan submitted previously for the preliminary injunction hearing in this case. There are changes affecting eight districts: Districts 61, 65 and 66 exchange population; Districts 128, 133 and 149 exchange population; and Districts 144, and 147 exchange population.

Chart 7: Changes Esselstyn House 1205 from Esselstyn House PI

District	Esselstyn Hse 1205 Pop	Esselstyn Hse 1205 Dev	Esselstyn Hse PI Pop	Esselstyn Hse PI Dev	Pop. Diff	Pop. % Diff	Esselstyn Hse 1205 % AP Black VAP	Esselstyn Hse PI % AP Black VAP
61	58950	-0.94%	58928	-0.98%	22	0.0%	53.5%	64.9%
65	59240	-0.46%	59076	-0.73%	164	0.3%	63.3%	55.3%
66	58961	-0.92%	59147	-0.61%	-186	-0.3%	53.9%	50.6%
128	58864	-1.09%	58869	-1.08%	-5	0.0%	50.4%	50.4%
133	59768	0.43%	59695	0.31%	73	0.1%	26.1%	27.6%
149	59392	-0.20%	59460	-0.09%	-68	-0.1%	51.5%	50.0%
144	58533	-1.64%	58642	-1.46%	-109	-0.2%	24.9%	25.0%
147	58567	-1.59%	58458	-1.77%	109	0.2%	30.5%	30.5%

41. In the Metro Atlanta area, House District 61 exchanges population with House Districts 65 and 66, resulting in a deviation that moves from -0.98% to -0.94% and an 18+ AP Black % that moves from 64.9% to 53.5%.

42. House District 65 exchanges population with House District 61, resulting in a deviation that moves from -0.73% to -0.46% and an 18+ AP Black % that moves from 55.3% to 63.3%.

43. House District 66 exchanges population with House District 61, resulting in a deviation that moves from -0.61% to -0.92% and an 18+ AP Black % that moves from 50.6% to 53.9%.

44. In Houston County, House District 144 exchanges population with House District 147, resulting in a deviation that moves from -1.46% to -1.64% and an 18+ AP Black % that moves from 25.0% to 24.9%.

45. House District 147 exchanges population with House District 144, resulting in a deviation that moves from -1.77% to -1.59% and an 18+ AP Black % that moves from 30.5% to 30.5%.

46. In Baldwin County, House District 128 exchanges population with House District 149, resulting in a deviation that moves from -1.08% to -1.09% and an 18+ AP Black % that moves from 50.4% to 50.4%. The effect of these changes makes the Esselstyn 1205 House District 128 the same as the enacted House District 128.

47. In Baldwin County, House District 133 exchanges population with House District 149, resulting in a deviation that moves from +0.31% to +0.43% and an 18+ AP Black % that moves from 27.6% to 26.1%.

48. In Baldwin County, House District 149 exchanges population with House Districts 128 and 133, resulting in a new deviation that moves from -0.09% to -0.20% and an 18+ AP Black % that moves from 50.0% to 51.5%.

49. Looking more closely at the Esselstyn House 1205 plan, here is a chart that summarizes top-line statistics about the plan and compares them to the enacted plan.

Chart 8: Esselstyn 1205 House and Enacted House Plan comparisons

Plan metrics	Esselstyn House 1205	Enacted House
County splits	70	69
Voting precinct splits	185	184
Mean compactness - Reock	0.39	0.39
Mean compactness - Polsby Popper	0.28	0.28
# Paired incumbents	28	20
# Seats majority 18+_AP_Bl% %	54	49
Deviation relative range	-1.94% to 1.91%	-1.40% to 1.34%
Deviation overall range	3.85%	2.74%

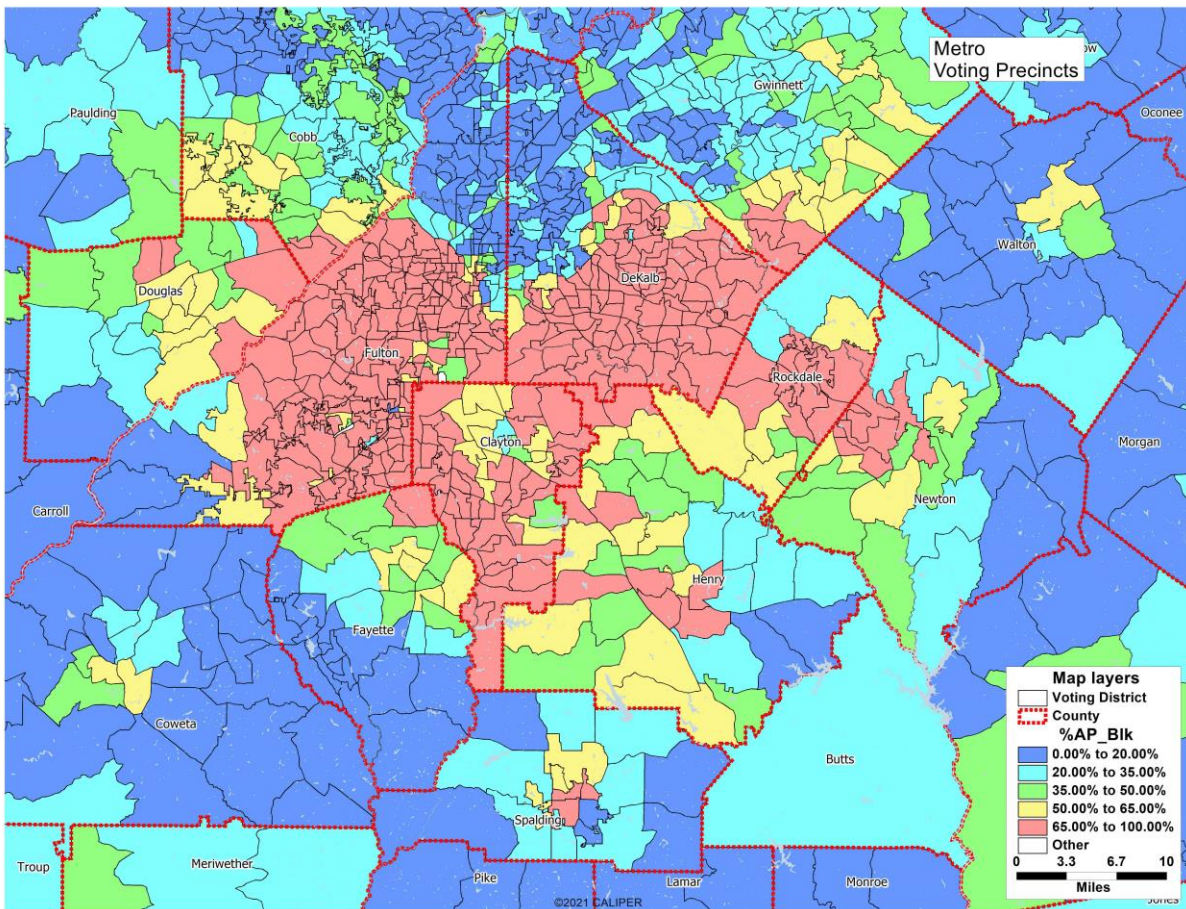
50. The Esselstyn 1205 plan uses a deviation range that is a full percentage point larger in range than the 2021 Enacted House plan. The overall compactness scores on the Esselstyn 1205 House plan and the 2021 enacted House plan are similar; however, of the 25 districts changed in the Esselstyn 1205 House plan, 15

districts are less compact on the Reock measurement, and 14 districts are less compact on the Polsby-Popper measurement. The chart below shows the compactness scores of the newly created majority-Black districts which Mr. Esselstyn identified in his report and the compactness scores of the corresponding district number in the 2021 adopted plans.

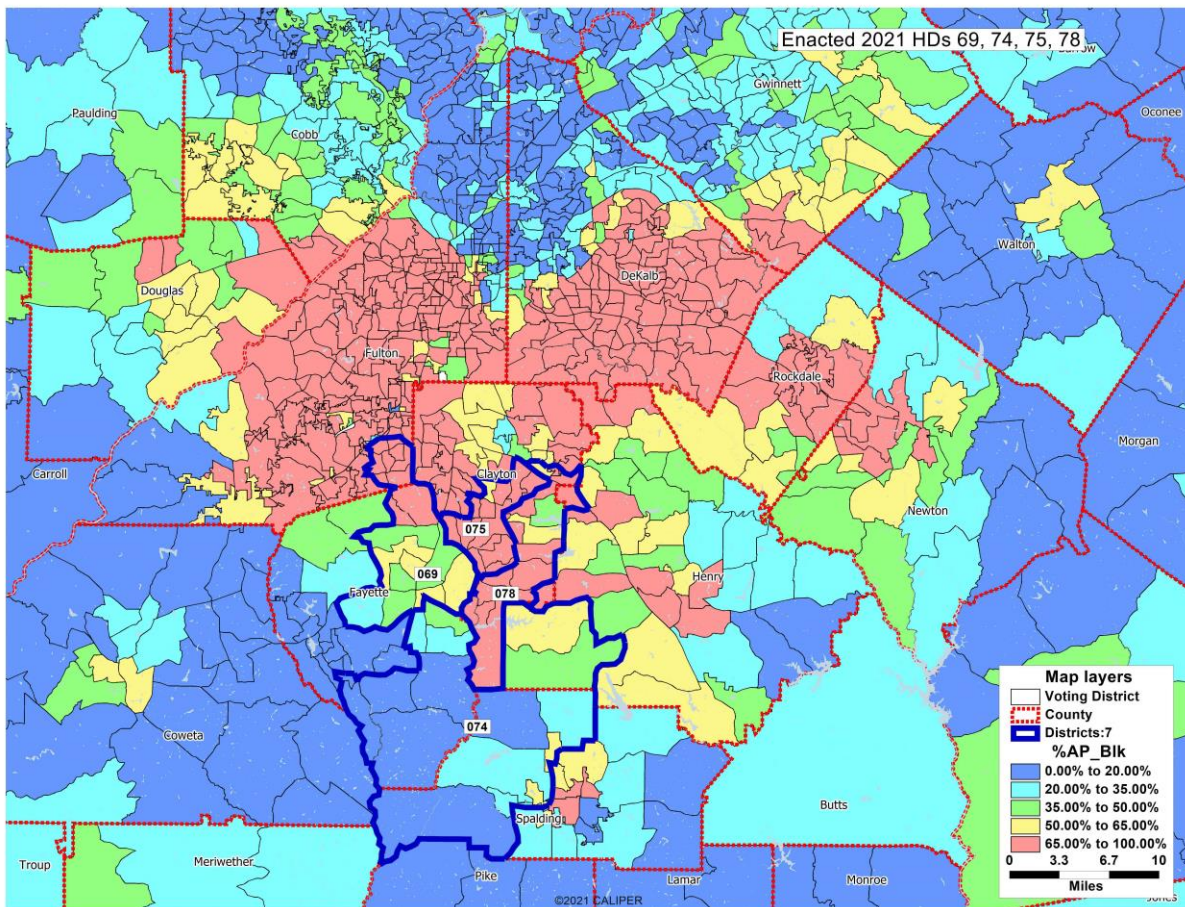
Chart 9: Compactness score summary

New Black-Majority District	Enacted Plan Reock	Esselstyn 1205 Plan Reock	Enacted Plan Polsby-Popper	Esselstyn 1205 Plan Polsby-Popper
House 64	0.37	0.22	0.36	0.22
House 74	0.50	0.30	0.25	0.19
House 117	0.41	0.40	0.28	0.33
House 145	0.38	0.34	0.19	0.21
House 149	0.32	0.46	0.22	0.28

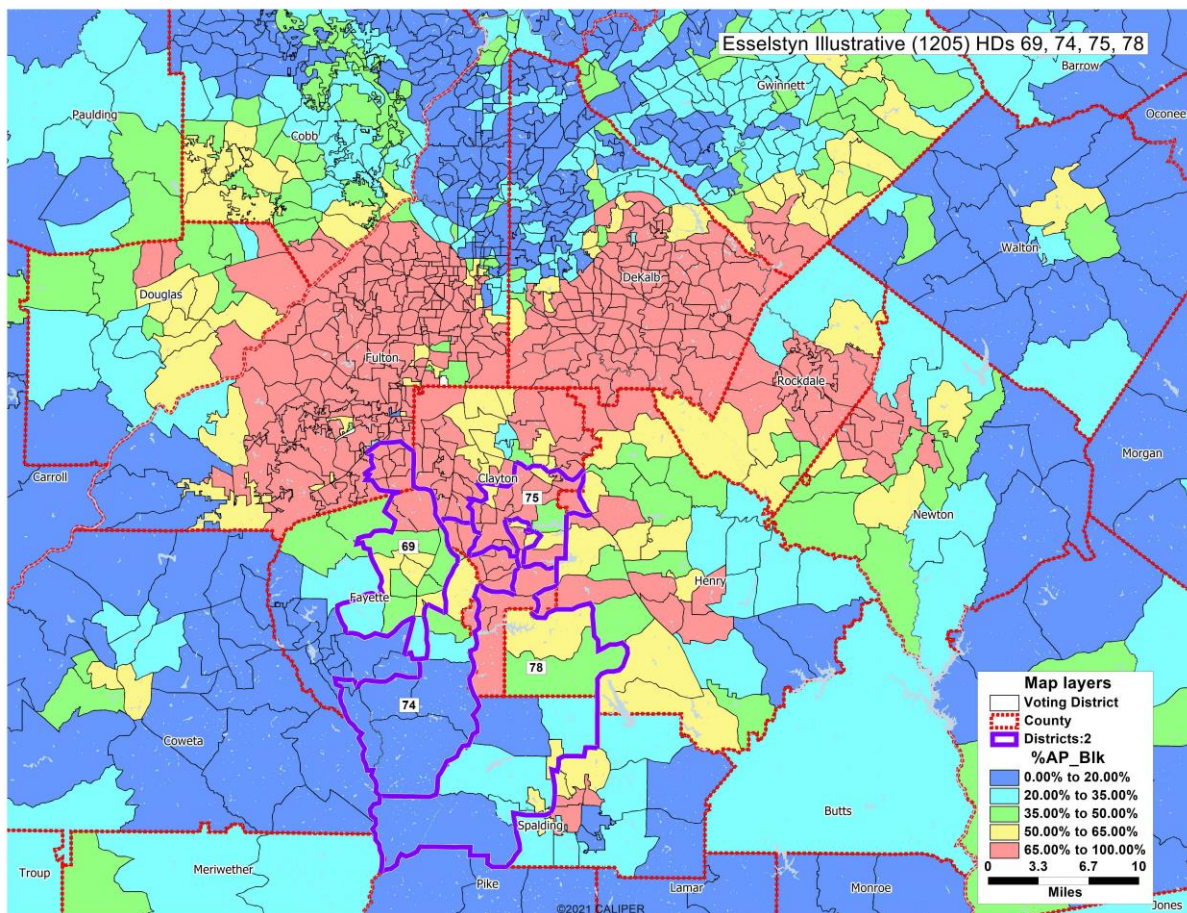
51. Below is a map showing the Metro region with a theme of AP-Black % on the voting districts, as well as maps of a group of four house districts (69, 74, 75, and 78) in the Enacted House and the Esselstyn 1205 House plan.



52. As shown in the Senate plan analysis, the voting districts themed in red have an AP-Black % of greater than 65% and voting districts themed in yellow have an AP-Black % of 50% to 65%. Voting districts themed in green have an AP-Black % of 35% to 50%; light blue have an AP-Black % of 20% to 35%; and darker blue have an AP-Black % of less than 20%.



53. In the enacted House plan, Districts 75 and 78 are primarily within Clayton County, District 69 is anchored in heavily Black southern Fulton County combined with central Fayette County, and District 74 is comprised of southern Fayette County, western Spalding County and two voting precincts of Henry County.



54. In the Esselstyn 1205 House plan, the engineering of a new majority Black district is accomplished by elongating the districts to connect to Clayton County to predominantly white areas of Fayette and Spalding Counties. District 74 takes the “tail” of southern Clayton County and goes south through Henry to western Spalding County. District 74 takes part of Jonesboro in Clayton County, punches through the blocking District 69, to go south to southern Fayette County. The data in the chart below shows that the configuration of these four districts in the Esselstyn

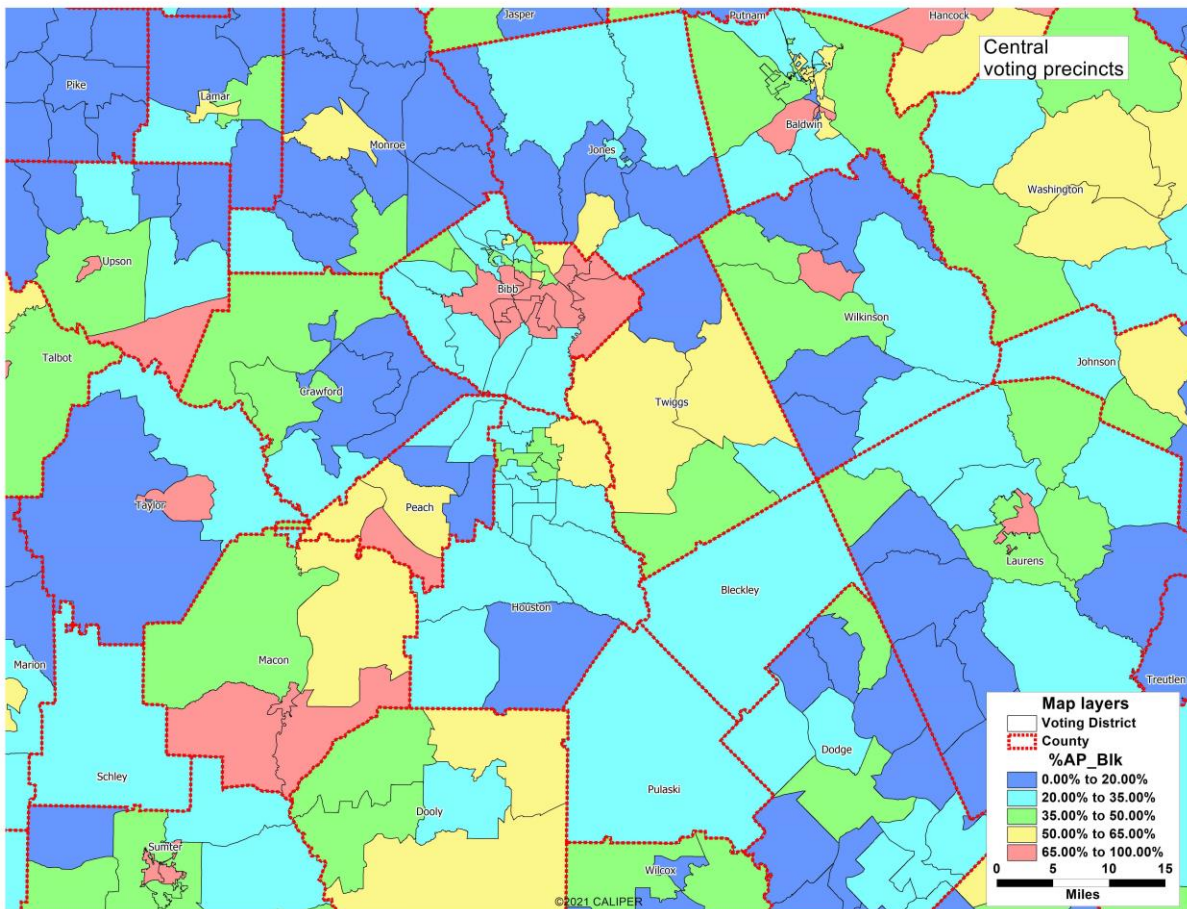
1205 House plan lowers the mean compactness score compared to the configuration of the districts in the Enacted House plan.

Chart 10: Compactness scores in four House districts

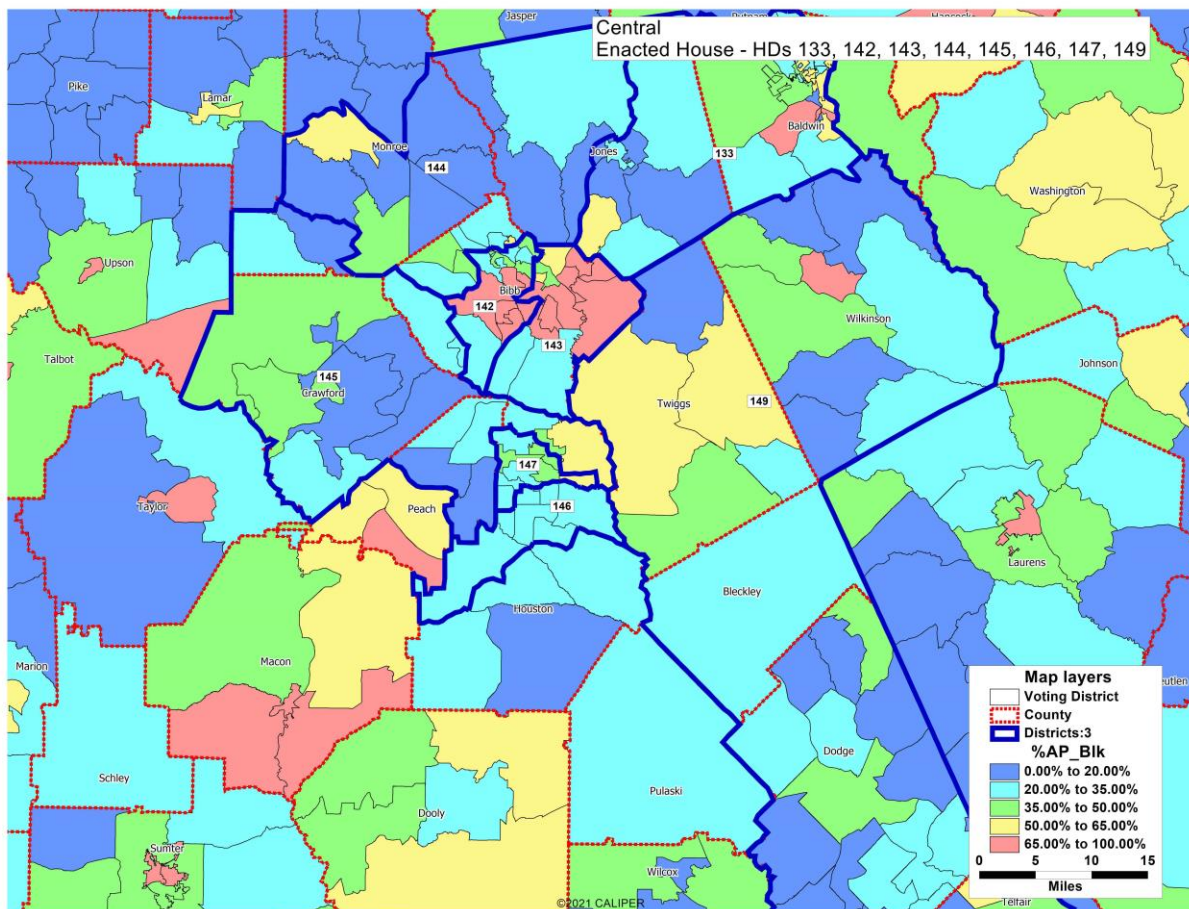
District	Enacted House				Esselstyn House 1205			
	% Devn.	Reock	Polsby-Popper	% 18+ AP Blk	% Devn.	Reock	Polsby-Popper	% 18+ AP Blk
069	-1.39	0.4	0.25	63.56%	-1.94	0.33	0.22	62.7%
074	-0.93	0.5	0.25	25.52%	-1.84	0.3	0.19	53.9%
075	0.39	0.42	0.28	74.40%	0.42	0.46	0.18	66.9%
078	-0.78	0.21	0.19	71.58%	0.64	0.31	0.18	51.0%
Mean Compactness	0.38 0.24				0.35 0.19			

55. Looking at specific districts (as above) shows that the compactness of the districts is impacted by the efforts to create more majority Black districts. The Black percentage is lowered only by elongating the district to include lower concentrations of Black population. This allows the Black population to be redistributed and to create other majority Black districts.

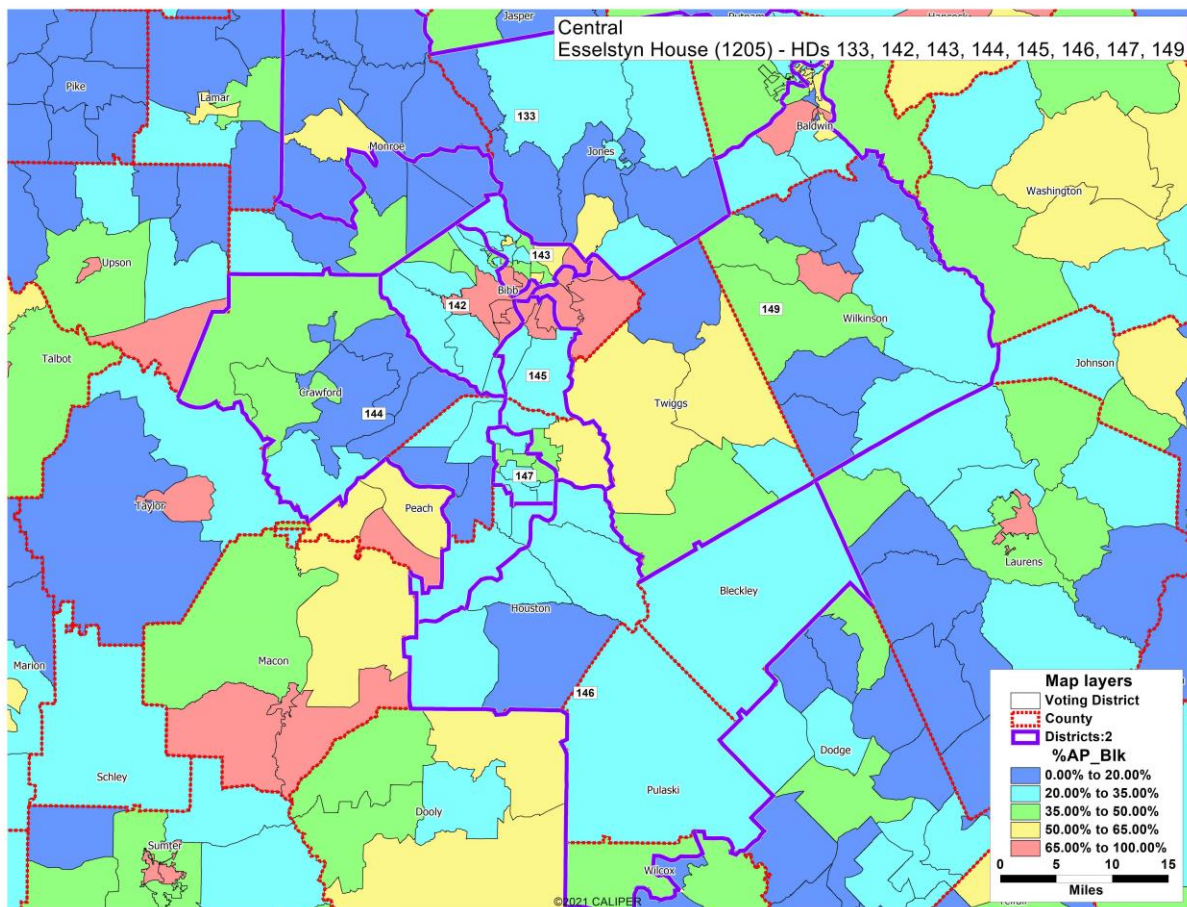
56. Below is a map showing Central Georgia around Macon with a theme of AP-Black % on the voting districts. The map shows a concentration of Black population in Bibb County (Macon) as well as enclaves of majority AP-Black population voting precincts within the center of the surrounding rural counties.



57. The enacted plan has two majority 18+AP Black districts drawn entirely within Bibb County. Enacted House District 143 is in the eastern portion of Bibb County, enacted House District 142 is in the central portion of Bibb County, leaving the western portion of Bibb County in districts to the north and west.



58. In order to create additional majority 18+AP-Black districts in the Macon area, the Esselstyn 1205 House plan moves House Districts 142 and 143 to the west and lowers their 18+AP-Black % to barely 50%. The plan strategically utilizes the remaining Black population in Bibb County, to spin one district to the south to pick-up Black population from the Robins Air Force base in Houston County and spin one district to the east to connect through two counties to Milledgeville in Baldwin County.



59. The chart below compares the split counties in both the Enacted and Esselstyn 1205 House plans as well as some demographic data for those counties. The enacted House plan splits 69 counties and the Esselstyn 1205 House plan splits 70 counties. Both plans split the same 68 counties.

Chart 11: County splits Enacted HD vs Esselstyn 1205

Name	Population	AP Blk	AP Blk %	18+ Pop	18+ AP Blk	18+ AP Blk %	Split in Enacted House	Split in Esselstyn 1205 House
Appling	18,444	3,647	19.8%	13,958	2,540	18.2%	x	x
Baldwin	43,799	18,985	43.3%	35,732	14,515	40.6%	x	x
Barrow	83,505	11,907	14.3%	62,195	8,222	13.2%	x	x
Bartow	108,901	13,395	12.3%	83,570	9,377	11.2%	x	x
Ben Hill	17,194	6,537	38.0%	13,165	4,745	36.0%	x	x
Bibb	157,346	88,865	56.5%	120,902	64,270	53.2%	x	x
Bryan	44,738	7,463	16.7%	31,828	5,025	15.8%	x	x
Bulloch	81,099	24,375	30.1%	64,494	18,220	28.3%	x	x
Carroll	119,148	24,618	20.7%	90,996	17,827	19.6%	x	x
Catoosa	67,872	2,642	3.9%	52,448	1,684	3.2%	x	x
Chatham	295,291	115,458	39.1%	234,715	85,178	36.3%	x	x
Cherokee	266,620	21,687	8.1%	202,928	14,976	7.4%	x	x
Clarke	128,671	33,672	26.2%	106,830	24,776	23.2%	x	x
Clayton	297,595	216,351	72.7%	220,578	158,854	72.0%	x	x
Cobb	766,149	223,116	29.1%	591,848	166,141	28.1%	x	x
Coffee	43,092	12,575	29.2%	32,419	9,191	28.4%	x	x
Columbia	156,010	32,516	20.8%	114,823	22,273	19.4%	x	x
Cook	17,229	5,014	29.1%	12,938	3,595	27.8%	x	x
Coweta	146,158	28,289	19.4%	111,155	20,196	18.2%	x	x
Dawson	26,798	392	1.5%	21,441	249	1.2%	x	x
DeKalb	764,382	407,451	53.3%	595,276	314,230	52.8%	x	x
Dougherty	85,790	61,457	71.6%	66,266	45,631	68.9%	x	x
Douglas	144,237	74,260	51.5%	108,428	53,377	49.2%	x	x
Effingham	64,769	10,035	15.5%	47,295	6,831	14.4%	x	x
Fayette	119,194	32,076	26.9%	91,798	23,728	25.8%	x	x
Floyd	98,584	15,606	15.8%	76,295	11,064	14.5%	x	x
Forsyth	251,283	13,222	5.3%	181,193	8,751	4.8%	x	x
Fulton	1,066,710	477,624	44.8%	847,182	368,635	43.5%	x	x
Glynn	84,499	22,098	26.2%	66,468	15,620	23.5%	x	x
Gordon	57,544	2,919	5.1%	43,500	1,939	4.5%	x	x
Grady	26,236	7,693	29.3%	19,962	5,678	28.4%	x	x
Gwinnett	957,062	287,687	30.1%	709,484	202,762	28.6%	x	x
Habersham	46,031	2,165	4.7%	35,878	1,675	4.7%	x	x
Hall	203,136	17,006	8.4%	153,844	12,094	7.9%	x	x
Harris	34,668	5,742	16.6%	26,799	4,431	16.5%	x	x
Henry	240,712	125,211	52.0%	179,973	89,657	49.8%	x	x

Name	Population	AP Blk	AP Blk %	18+ Pop	18+ AP Blk	18+ AP Blk %	Split in Enacted House	Split in Esselstyn 1205 House
Houston	163,633	56,520	34.5%	122,118	39,605	32.4%	x	x
Jackson	75,907	6,148	8.1%	56,451	4,268	7.6%	x	x
Jasper	14,588	2,676	18.3%	11,118	1,966	17.7%	x	x
Lamar	18,500	5,220	28.2%	14,541	4,017	27.6%	x	x
Liberty	65,256	31,146	47.7%	48,014	21,700	45.2%	x	x
Lowndes	118,251	46,758	39.5%	89,031	33,302	37.4%	x	x
Lumpkin	33,488	685	2.0%	27,689	507	1.8%	x	x
Madison	30,120	3,196	10.6%	23,112	2,225	9.6%	x	x
McDuffie	21,632	9,045	41.8%	16,615	6,425	38.7%	x	x
Meriwether	20,613	7,547	36.6%	16,526	5,845	35.4%	x	x
Monroe	27,957	6,444	23.0%	21,913	5,068	23.1%	x	x
Muscogee	206,922	102,212	49.4%	157,052	74,301	47.3%	x	x
Newton	112,483	55,901	49.7%	84,748	40,433	47.7%	x	x
Oconee	41,799	2,280	5.5%	30,221	1,660	5.5%	x	x
Paulding	168,661	41,296	24.5%	123,998	28,164	22.7%	x	x
Peach	27,981	12,645	45.2%	22,111	9,720	44.0%	x	x
Putnam	22,047	5,701	25.9%	17,847	4,229	23.7%	x	x
Richmond	206,607	119,970	58.1%	160,899	87,930	54.6%	x	x
Rockdale	93,570	57,204	61.1%	71,503	41,935	58.6%	x	x
Spalding	67,306	24,522	36.4%	52,123	17,511	33.6%	x	x
Sumter	29,616	15,546	52.5%	23,036	11,479	49.8%	x	x
Tattnall	22,842	6,331	27.7%	17,654	4,886	27.7%	x	x
Telfair	12,477	4,754	38.1%	10,190	3,806	37.4%	x	x
Thomas	45,798	16,975	37.1%	35,037	12,332	35.2%	x	x
Tift	41,344	12,734	30.8%	31,224	8,963	28.7%	x	x
Troup	69,426	25,473	36.7%	52,581	18,202	34.6%	x	x
Walker	67,654	3,664	5.4%	52,794	2,454	4.6%	x	x
Walton	96,673	18,804	19.5%	73,098	13,165	18.0%	x	x
Ware	36,251	11,421	31.5%	27,788	8,226	29.6%	x	x
Wayne	30,144	6,390	21.2%	23,105	4,662	20.2%	x	x
White	28,003	721	2.6%	22,482	484	2.2%	x	x
Whitfield	102,864	4,919	4.8%	76,262	3,349	4.4%	x	x
Jones	28,347	7,114	25.1%	21,575	5,341	24.8%	x	
Dodge	19,925	6,148	30.9%	15,709	4,725	30.1%		x
Wilcox	8,766	3,161	36.1%	7,218	2,693	37.3%		x
TOTAL							69	70

60. In comparison to the enacted House plan, the Esselstyn 1205 House plan makes one county whole (Jones) but introduces two new county splits (Dodge and Wilcox). Both additional split counties are attributable to the effort to create new majority Black districts.

61. Based on my analysis of the Esselstyn 1205 House plan, the impact of engineering more majority Black districts can be seen in the overall plan metrics and the differences from the enacted plan. Further, my analysis of the traditional redistricting factors – maintaining communities and traditional boundaries, compactness, and deviation – along with the manipulation of the boundaries of the new AP-Black districts, supports my opinion that the Esselstyn 1205 House plan is focused on race, prioritizing race to the detriment of traditional redistricting factors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of January, 2023.



JOHN B. MORGAN

EXHIBIT 1

JOHN B. MORGAN

Curriculum Vitae

Redistricting Background and Experience

- Performed redistricting work in 20 states, in the areas of map drawing, problem-solving and redistricting software operation.
- Performed demographic and election analysis work in 40 states, for both statewide and legislative candidates

2021-2022 Redistricting Cycle

- Mapping expert for Michigan Independent Citizens Redistricting Commission
- Mapping expert for Virginia Redistricting Commission
- Mapping expert for New Jersey Congressional Redistricting Commission
- Mapping expert for New Jersey Legislative Redistricting Commission
- Staff analyst for New Mexico Senate Republican caucus – Dec. 2021 special session
- Mapping consultant to Indiana State Senate Republican caucus
- Mapping consultant to redistricting commissioners in Atlantic County, New Jersey
- Drafted county commission districts for Sampson County, North Carolina
- Drafted wards for town of Brownsburg, Indiana

2011-2012 Redistricting Cycle

- Served as a consultant for:
 - Connecticut Redistricting Commission
 - Ohio Reapportionment Board
 - New Jersey Legislative Redistricting Commission
 - New Jersey Congressional Redistricting Commission
 - Pennsylvania Legislative Reapportionment Commission
- Drafted Wake County, North Carolina school board districts
- Drafted county commission districts in Sampson and Craven counties in North Carolina and Atlantic County in New Jersey
- Worked with redistricting commissions in Atlantic and Essex counties, New Jersey.
- Worked on statewide congressional, legislative, and local plans in the following states: Connecticut, Indiana, Kansas, Missouri, New Jersey, New Mexico, North Carolina, Ohio, Pennsylvania, South Carolina, and Virginia
- Plans drafted by Morgan adopted in whole or part by the following states: Connecticut, Indiana, New Jersey, New Mexico, North Carolina, South Carolina, Virginia.

2001-2002 Redistricting Cycle

- Worked on statewide congressional and legislative redistricting plans in the following states: Florida, Georgia, Indiana, Iowa, New Jersey, North Carolina, Pennsylvania, Rhode Island, and Virginia.
- Dealt with redistricting issues as a member of the Majority Leader's legislative staff in Virginia House of Delegates. Drafted alternate plans for use by the minority parties in

Rhode Island. Drafted alternate plans for use by legislative leadership in considering plans drawn by redistricting commission staff in Iowa.

1991-1992 Redistricting Cycle

- Worked on statewide congressional and legislative redistricting plans in the following states: Florida, Illinois, Indiana, Michigan, New Jersey, New York, Pennsylvania, Wisconsin.
- Focused primarily on Voting Rights Act issues with Black, Hispanic and Asian communities.
- Federal court incorporated portion of legislative plan drafted in part by Morgan for Wisconsin into final decree, finding the configuration superior to other plans in its treatment of minority voters.

Expert Experience and Trial Testimony

- Recognized as an expert in demographics and redistricting in *Egolf v. Duran*, New Mexico First Judicial District Court, Case No. D-101-CV-2011-02942, which dealt with New Mexico's legislative plans.
- In *Egolf v. Duran*, the Court adopted a House redistricting plan principally drafted by Morgan.
- Filed expert reports in *Georgia State Conference of NAACP v. Fayette County Board of Commissioners*.
- Filed expert reports and expert testimony in *Page v. Board of Elections*, Eastern District of Virginia; provided expert testimony at trial.
- Testified at trial in *Bethune Hill v. Virginia Board of Elections* and *Vesilind v. Virginia Board of Elections*.
- Filed expert report in *Georgia NAACP v. Gwinnett County*.
- Filed expert reports and expert testimony *Alpha Phi Alpha v. Raffensperger*; *Grant v. Raffensperger*; and *Pendergrass v. Raffensperger*

Education

- Bachelor of Arts degree in History from the University of Chicago
- Graduated with honors.
- Bachelor's Honors thesis on "The Net Effects of Gerrymandering 1896-1932."
- Demographic study on LaSalle, Illinois was published in *The History of the Illinois and Michigan Canal, Volume Five*.

Employment

- President of Applied Research Coordinates, a consulting firm specializing in political and demographic analysis and its application to elections and redistricting, 2007 to present
- Redistricting consultant for many legislatures and commissions: 1991, 2001, 2011, 2021
- Executive Director, GOPAC (Hon. J.C. Watts, Chairman), 2004-2007
- Vice-President of Applied Research Coordinates, 1999-2004
- National Field Director, GOPAC (Rep. John Shadegg, Chairman) 1995-1999
- Research Analyst, Applied Research Coordinates 1991-1995
- Research Analyst, Republican National Committee 1988-1989, summer

EXHIBIT 2

User:

Plan Name: Grant_Esselstyn_Sen_illus_12_05

Plan Type:

Measures of Compactness Report

Measures of Compactness Report

Grant_Esselstyn_Sen_illus_12_05

	Reock	Polsby-Popper
Sum	N/A	N/A
Min	0.17	0.13
Max	0.68	0.50
Mean	0.41	0.28
Std. Dev.	0.11	0.09

District	Reock	Polsby-Popper
1	0.49	0.31
2	0.47	0.22
3	0.39	0.21
4	0.47	0.27
5	0.17	0.21
6	0.42	0.23
7	0.35	0.34
8	0.45	0.23
9	0.24	0.21
10	0.25	0.19
11	0.36	0.33
12	0.62	0.39
13	0.48	0.25
14	0.27	0.24
15	0.57	0.32
16	0.39	0.27
17	0.35	0.16
18	0.38	0.20
19	0.53	0.37

District	Reock	Polsby-Popper
20	0.28	0.24
21	0.42	0.33
22	0.33	0.32
23	0.34	0.17
24	0.27	0.23
25	0.57	0.34
26	0.44	0.25
27	0.50	0.46
28	0.38	0.19
29	0.58	0.42
30	0.41	0.38
31	0.40	0.46
32	0.29	0.21
33	0.40	0.22
34	0.31	0.21
35	0.59	0.42
36	0.32	0.30
37	0.49	0.37
38	0.37	0.20
39	0.18	0.13
40	0.51	0.34
41	0.51	0.30
42	0.47	0.25
43	0.49	0.25
44	0.33	0.24
45	0.35	0.30
46	0.37	0.21
47	0.36	0.19
48	0.35	0.34
49	0.46	0.34
50	0.45	0.23

District	Reock	Polsby-Popper
51	0.68	0.50
52	0.47	0.25
53	0.49	0.40
54	0.60	0.44
55	0.34	0.27
56	0.38	0.30

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.

EXHIBIT 3

User:

Plan Name: Grant_Esselstyn_Sen_illus_12_05

Plan Type:

Districts & Their Incumbents

Districts & Their Incumbents

Grant_Esselstyn_Sen_illus_12_05

District	Name	Party	Previous District
1	Ben Watson	R	1
2	Lester Jackson, III	D	2
3	Sheila McNeill	R	3
4	Billy Hickman	R	4
5	Sheikh Rahman	D	5
6	Jen Jordan	D	6
7			
8	Russ Goodman	R	8
9	Nikki Merritt	D	9
10	Burt Jones	R	25
10	Emanuel Jones	D	10
11	Dean Burke	R	11
12	Freddie Powell Sims	D	12
13	Carden Summers	R	13
13	Tyler Harper	R	7
14			
15	Ed Harbison	D	15
16	Marty Harbin	R	16
17			
18	John Kennedy	R	18
19	Blake Tillery	R	19
20	Larry Walker III	R	20
21	Brandon Beach	R	21
22	Harold Jones	D	22
23	Max Burns	R	23
24	Lee Anderson	R	24
25	Brian Strickland	R	17
26	David Lucas	D	26
27	Greg Dolezal	R	27
28	Matt Brass	R	28
29	Randy Robertson	R	29
30	Mike Dugan	R	30
31	Jason Anavitarte	R	31
32	Kay Kirkpatrick	R	32
33	Michael Rhett	D	33
34	Valencia Seay	D	34
35	Donzella James	D	35
36	Nan Orrock	D	36
37	Lindsey Tippins	R	37
38	Horacena Tate	D	39

39	Sonya Halpern	D	39
40	Sally Harrell	D	40
41	Kim Jackson	D	41
42	Elena Parent	D	42
43	Tonya Anderson	D	43
44	Gail Davenport	D	44
45	Clint Dixon	R	45
46	Bill Cowser	R	46
47	Frank Ginn	R	47
48	Michelle Au	D	48
49	Butch Miller	R	49
50	Bo Hatchett	R	50
51	Steve Gooch	R	51
52	Chuck Hufstetler	R	52
52	Bruce Thompson	R	14
53	Jeff Mullis	R	53
54	Chuck Payne	R	54
55	Gloria Butler	D	55
56	John Albers	R	56

Number of Incumbents in District with more than one Incumbent:

6

Number of Districts with No Incumbent:

3

Number of Districts with Incumbents of more than one party:

1

Number of Districts with Paired Democrats:

0

Number of Districts with Paired Republicans:

2



EXHIBIT 4

User:

Plan Name: Grant_Esselstyn_Sen_illus_12_05

Plan Type:

Population Summary

Population Summary

Grant_Esselstyn_Sen_illus_12_05

District	Population	Deviation	% Devn.	[% 18+_AP_Blkl	[% Black]
1	191,402	118	0.06%	25.08%	24.27%
2	190,408	-876	-0.46%	46.86%	48.03%
3	191,212	-72	-0.04%	21.18%	21.28%
4	191,098	-186	-0.10%	23.37%	22.86%
5	191,921	637	0.33%	29.94%	27.57%
6	191,834	550	0.29%	22.95%	21%
7	189,709	-1,575	-0.82%	21.44%	20.56%
8	192,396	1,112	0.58%	30.38%	30.35%
9	192,915	1,631	0.85%	29.53%	29%
10	192,601	1,317	0.69%	61.1%	59.43%
11	189,976	-1,308	-0.68%	31.04%	31.3%
12	190,819	-465	-0.24%	57.97%	59.08%
13	194,905	3,621	1.89%	27.24%	27.41%
14	192,533	1,249	0.65%	18.97%	17.15%
15	189,446	-1,838	-0.96%	54%	52.99%
16	190,077	-1,207	-0.63%	19.72%	19.46%
17	193,838	2,554	1.34%	21.77%	21.64%
18	192,680	1,396	0.73%	30.04%	29.57%
19	192,316	1,032	0.54%	25.72%	25.16%
20	194,919	3,635	1.90%	32.45%	32.35%
21	192,572	1,288	0.67%	7.46%	6.66%
22	188,930	-2,354	-1.23%	50.84%	50.98%
23	188,095	-3,189	-1.67%	51.06%	51.48%
24	194,277	2,993	1.56%	18.38%	17.49%
25	192,708	1,424	0.74%	58.93%	58.22%
26	190,535	-749	-0.39%	52.84%	54.05%
27	190,676	-608	-0.32%	5%	4.43%
28	189,696	-1,588	-0.83%	57.28%	56.2%
29	189,424	-1,860	-0.97%	26.88%	26.49%
30	191,939	655	0.34%	15.77%	14.88%
31	192,755	1,471	0.77%	19.61%	19.22%
32	192,448	1,164	0.61%	14.86%	13.56%
33	192,694	1,410	0.74%	42.96%	41.18%
34	192,023	739	0.39%	58.97%	57.52%
35	193,194	1,910	1.00%	54.05%	52.94%
36	192,282	998	0.52%	51.34%	51.92%
37	192,671	1,387	0.73%	19.27%	18.38%
38	190,605	-679	-0.35%	66.36%	64.48%

Population Summary

Grant_Esselstyn_Sen_illus_12_05

39	190,184	-1,100	-0.58%	60.21%	60.38%
40	190,544	-740	-0.39%	19.24%	16.84%
41	191,023	-261	-0.14%	62.61%	60.99%
42	190,153	-1,131	-0.59%	29.09%	26.9%
43	191,784	500	0.26%	58.52%	57.48%
44	188,256	-3,028	-1.58%	71.52%	69.94%
45	190,692	-592	-0.31%	18.58%	17.52%
46	190,312	-972	-0.51%	16.9%	16.88%
47	190,607	-677	-0.35%	17.42%	17.14%
48	190,123	-1,161	-0.61%	9.47%	8.51%
49	189,355	-1,929	-1.01%	7.96%	7.32%
50	189,320	-1,964	-1.03%	5.61%	5.13%
51	190,167	-1,117	-0.58%	1.21%	0.88%
52	190,799	-485	-0.25%	13.04%	12.56%
53	190,236	-1,048	-0.55%	5.1%	4.52%
54	192,443	1,159	0.61%	3.79%	3.13%
55	190,155	-1,129	-0.59%	65.97%	63.85%
56	191,226	-58	-0.03%	7.57%	6.5%

Total Population: 10,711,908

Ideal District Population: 191,284

Summary Statistics:

Population Range:	188,095 to 194,919
Ratio Range:	0.04
Absolute Range:	-3,189 to 3,635
Absolute Overall Range:	6824
Relative Range:	-1.67% to 1.90%
Relative Overall Range:	3.57%
Absolute Mean Deviation:	1283.86
Relative Mean Deviation:	0.67%
Standard Deviation:	1529.53

EXHIBIT 5

User:

Plan Name: Grant_Esselstyn_Sen_12_05

Plan Type:

Political Subdivision Splits Between Districts

Political Subdivision Splits Between Districts

Grant_Esselstyn_Sen_12_05

Number of subdivisions not split:

County	125
Voting District	2,649

Number of subdivisions split into more than one district:

County	34
Voting District	49

Number of splits involving no population:

County	0
Voting District	7

Split Counts

County

Cases where an area is split among 2 Districts: 22

Cases where an area is split among 3 Districts: 7

Cases where an area is split among 4 Districts: 1

Cases where an area is split among 6 Districts: 1

Cases where an area is split among 7 Districts: 1

Cases where an area is split among 9 Districts: 1

Cases where an area is split among 10 Districts: 1

Voting District

Cases where an area is split among 2 Districts: 48

Cases where an area is split among 3 Districts: 1

County	Voting District	District	Population
<i>Split Counties:</i>			
Baldwin GA		17	16,966
Baldwin GA		23	26,833
Barrow GA		45	39,217
Barrow GA		46	17,116
Barrow GA		47	27,172
Bartow GA		37	11,130
Bartow GA		52	97,771
Chatham GA		1	81,408
Chatham GA		2	190,408
Chatham GA		4	23,475
Cherokee GA		21	109,034
Cherokee GA		32	90,981
Cherokee GA		56	66,605
Clarke GA		46	52,016
Clarke GA		47	76,655
Clayton GA		25	37,295
Clayton GA		28	19,071
Clayton GA		34	135,995

Political Subdivision Splits Between Districts

Grant_Esselstyn_Sen_12_05

Clayton GA	44	105,234
Cobb GA	6	97,590
Cobb GA	32	101,467
Cobb GA	33	192,694
Cobb GA	37	181,541
Cobb GA	38	102,964
Cobb GA	56	89,893
Coffee GA	13	19,881
Coffee GA	19	23,211
Columbia GA	22	30,174
Columbia GA	24	125,836
Coweta GA	16	39,894
Coweta GA	28	74,804
Coweta GA	30	31,460
DeKalb GA	10	82,066
DeKalb GA	40	164,997
DeKalb GA	41	183,560
DeKalb GA	42	190,153
DeKalb GA	43	17,660
DeKalb GA	44	60,228
DeKalb GA	55	65,718
Fayette GA	16	45,488
Fayette GA	28	17,678
Fayette GA	34	56,028
Floyd GA	52	85,090
Floyd GA	53	13,494
Forsyth GA	27	190,676
Forsyth GA	48	60,607
Fulton GA	6	94,244
Fulton GA	14	192,533
Fulton GA	21	83,538
Fulton GA	28	78,143
Fulton GA	35	30,198
Fulton GA	36	192,282
Fulton GA	38	87,641
Fulton GA	39	190,184
Fulton GA	48	83,219
Fulton GA	56	34,728
Gordon GA	52	7,938
Gordon GA	54	49,606
Greene GA	17	14,168
Greene GA	23	4,747
Gwinnett GA	5	191,921
Gwinnett GA	7	189,709
Gwinnett GA	9	192,915
Gwinnett GA	40	25,547
Gwinnett GA	41	7,463
Gwinnett GA	45	151,475
Gwinnett GA	46	27,298
Gwinnett GA	48	46,297
Gwinnett GA	55	124,437

Political Subdivision Splits Between Districts

Grant_Esselstyn_Sen_12_05

Hall GA		49	189,355
Hall GA		50	13,781
Henry GA		10	62,505
Henry GA		25	155,413
Henry GA		44	22,794
Houston GA		18	96,912
Houston GA		20	33,532
Houston GA		26	33,189
Jackson GA		47	56,660
Jackson GA		50	19,247
McDuffie GA		23	12,164
McDuffie GA		24	9,468
Muscogee GA		15	142,205
Muscogee GA		29	64,717
Newton GA		17	9,333
Newton GA		43	103,150
Paulding GA		31	149,902
Paulding GA		35	18,759
Richmond GA		22	158,756
Richmond GA		23	47,851
Rockdale GA		10	22,596
Rockdale GA		43	70,974
Walton GA		17	44,590
Walton GA		46	52,083
Ware GA		3	10,431
Ware GA		8	25,820
White GA		50	12,642
White GA		51	15,361
Wilcox GA		13	5,579
Wilcox GA		20	3,187
Wilkes GA		23	3,747
Wilkes GA		24	5,818

Split VTDs:

Baldwin GA	NORTH MILLEDGEVILLE	17	2,373
Baldwin GA	NORTH MILLEDGEVILLE	23	991
Baldwin GA	SOUTH MILLEDGEVILLE	17	1,215
Baldwin GA	SOUTH MILLEDGEVILLE	23	2,491
Chatham GA	BLOOMINGDALE	1	4,099
Chatham GA	COMMUNITY CENTER		
Chatham GA	BLOOMINGDALE	4	755
Chatham GA	COMMUNITY CENTER		
Chatham GA	POOLER CHRURCH	1	5,330
Chatham GA	POOLER CHRURCH	4	4,407
Clarke GA	3B	46	5,752
Clarke GA	3B	47	4,194
Clarke GA	6C	46	2,971
Clarke GA	6C	47	2,036
Cobb GA	Dobbins 01	6	6,586
Cobb GA	Dobbins 01	33	6,310
Cobb GA	Dobbins 01	38	505
Cobb GA	Elizabeth 01	32	3,771

Political Subdivision Splits Between Districts

Grant_Esselstyn_Sen_12_05

Cobb GA	Elizabeth 01	37	2,099
Cobb GA	Kennesaw 1A	32	1,471
Cobb GA	Kennesaw 1A	37	2,972
Cobb GA	Marietta 3A	32	3,439
Cobb GA	Marietta 3A	33	5,460
Cobb GA	Marietta 5A	6	0
Cobb GA	Marietta 5A	33	4,334
Cobb GA	Marietta 6A	6	3,022
Cobb GA	Marietta 6A	32	1,532
Cobb GA	Marietta 7A	6	993
Cobb GA	Marietta 7A	33	5,918
Cobb GA	Nickajack 01	6	2,398
Cobb GA	Nickajack 01	38	3,728
Cobb GA	Norton Park 01	33	7,049
Cobb GA	Norton Park 01	38	752
Cobb GA	Oregon 03	33	12,988
Cobb GA	Oregon 03	37	0
Cobb GA	Powers Ferry 01	6	4,963
Cobb GA	Powers Ferry 01	33	464
Cobb GA	Sewell Mill 03	6	5,051
Cobb GA	Sewell Mill 03	33	1,886
Cobb GA	Smyrna 1A	6	5,341
Cobb GA	Smyrna 1A	38	1,292
Cobb GA	Vinings 02	6	4,624
Cobb GA	Vinings 02	38	5,019
Coffee GA	DOUGLAS	13	12,595
Coffee GA	DOUGLAS	19	15,976
DeKalb GA	Flakes Mill Fire Station	10	2,263
DeKalb GA	Flakes Mill Fire Station	44	396
DeKalb GA	Harris - Narvie J. Harris Elem	10	3,339
DeKalb GA	Harris - Narvie J. Harris Elem	44	1,682
Floyd GA	GARDEN LAKES	52	1,024
Floyd GA	GARDEN LAKES	53	7,817
Forsyth GA	BIG CREEK	27	15,216
Forsyth GA	BIG CREEK	48	10,302
Forsyth GA	POLO	27	24,894
Forsyth GA	POLO	48	964
Fulton GA	RW09	21	2,971
Fulton GA	RW09	56	4,750
Fulton GA	RW12	21	4,274
Fulton GA	RW12	56	3,958
Fulton GA	SC05A	28	681
Fulton GA	SC05A	35	317
Fulton GA	SC08B	28	223
Fulton GA	SC08B	39	5,124
Fulton GA	SC13	28	15
Fulton GA	SC13	35	4,019
Fulton GA	SC18C	35	1,852
Fulton GA	SC18C	39	521

Political Subdivision Splits Between Districts

Grant_Esselstyn_Sen_12_05

Gordon GA	LILY POND	52	1,641
Gordon GA	LILY POND	54	996
Gwinnett GA	DACULA	45	2,699
Gwinnett GA	DACULA	46	4,613
Gwinnett GA	LAWRENCEVILLE E	5	2,075
Gwinnett GA	LAWRENCEVILLE E	9	1,386
Gwinnett GA	PINCKNEYVILLE W	5	5,605
Gwinnett GA	PINCKNEYVILLE W	7	2,701
Hall GA	GLADE	49	5,135
Hall GA	GLADE	50	1,735
Hall GA	TADMORE	49	4,129
Hall GA	TADMORE	50	10,220
Houston GA	RECR	20	0
Houston GA	RECR	26	17,798
Jackson GA	Central Jackson	47	24,383
Jackson GA	Central Jackson	50	0
Jackson GA	North Jackson	47	0
Jackson GA	North Jackson	50	19,247
Muscogee GA	COLUMBUS TECH	15	6,919
Muscogee GA	COLUMBUS TECH	29	2,228
Paulding GA	AUSTIN MIDDLE SCHOOL	31	971
Paulding GA	AUSTIN MIDDLE SCHOOL	35	9,922
Paulding GA	TAYLOR FARM PARK	31	4,596
Paulding GA	TAYLOR FARM PARK	35	8,837
Ware GA	100	3	2,672
Ware GA	100	8	3,692
Ware GA	200A	3	0
Ware GA	200A	8	4,133
Ware GA	304	3	0
Ware GA	304	8	2,107
Ware GA	400	3	4,626
Ware GA	400	8	406
Wilcox GA	ROCHELLE SOUTH	13	786
Wilcox GA	ROCHELLE SOUTH	20	794

EXHIBIT 6

User:

Plan Name: Grant_Esselstyn_Sen_12_05

Plan Type:

Plan Components with Population Detail

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

	Total Population	AP_Bl
District 1		
County: Bryan GA		
Total:	44,738	7,463 16.68%
Voting Age	31,828	5,025 15.79%
County: Chatham GA		
Total:	81,408	13,170 16.18%
Voting Age	65,586	9,743 14.86%
County: Liberty GA		
Total:	65,256	31,146 47.73%
Voting Age	48,014	21,700 45.20%
District 1 Total		
Total:	191,402	51,779 27.05%
Voting Age	145,428	36,468 25.08%
District 2		
County: Chatham GA		
Total:	190,408	95,717 50.27%
Voting Age	150,843	70,688 46.86%
District 2 Total		
Total:	190,408	95,717 50.27%
Voting Age	150,843	70,688 46.86%
District 3		
County: Brantley GA		
Total:	18,021	733 4.07%
Voting Age	13,692	470 3.43%
County: Camden GA		
Total:	54,768	11,072 20.22%
Voting Age	41,808	7,828 18.72%
County: Charlton GA		

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Total:	12,518	2,798
		22.35%
Voting Age	10,135	2,147
		21.18%
County: Glynn GA		
Total:	84,499	22,098
		26.15%
Voting Age	66,468	15,620
		23.50%
County: McIntosh GA		
Total:	10,975	3,400
		30.98%
Voting Age	9,040	2,641
		29.21%
County: Ware GA		
Total:	10,431	4,137
		39.66%
Voting Age	7,772	2,839
		36.53%
District 3 Total		
Total:	191,212	44,238
		23.14%
Voting Age	148,915	31,545
		21.18%
District 4		
County: Bulloch GA		
Total:	81,099	24,375
		30.06%
Voting Age	64,494	18,220
		28.25%
County: Candler GA		
Total:	10,981	2,807
		25.56%
Voting Age	8,241	2,009
		24.38%
County: Chatham GA		
Total:	23,475	6,571
		27.99%
Voting Age	18,286	4,747
		25.96%
County: Effingham GA		
Total:	64,769	10,035
		15.49%
Voting Age	47,295	6,831
		14.44%
County: Evans GA		
Total:	10,774	3,273
		30.38%
Voting Age	8,127	2,410
		29.65%
District 4 Total		
Total:	191,098	47,061
		24.63%
Voting Age	146,443	34,217

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		23.37%
District 5		
County: Gwinnett GA		
Total:	191,921	57,719
		30.07%
Voting Age	139,394	41,736
		29.94%
District 5 Total		
Total:	191,921	57,719
		30.07%
Voting Age	139,394	41,736
		29.94%
District 6		
County: Cobb GA		
Total:	97,590	26,434
		27.09%
Voting Age	79,732	20,955
		26.28%
County: Fulton GA		
Total:	94,244	18,062
		19.17%
Voting Age	76,010	14,793
		19.46%
District 6 Total		
Total:	191,834	44,496
		23.20%
Voting Age	155,742	35,748
		22.95%
District 7		
County: Gwinnett GA		
Total:	189,709	43,563
		22.96%
Voting Age	147,425	31,601
		21.44%
District 7 Total		
Total:	189,709	43,563
		22.96%
Voting Age	147,425	31,601
		21.44%
District 8		
County: Atkinson GA		
Total:	8,286	1,284
		15.50%
Voting Age	6,129	937
		15.29%
County: Clinch GA		
Total:	6,749	2,096
		31.06%
Voting Age	5,034	1,406
		27.93%
County: Echols GA		
Total:	3,697	193
		5.22%
Voting Age	2,709	121

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		4.47%
County: Lanier GA		
Total:	9,877	2,369
		23.99%
Voting Age	7,326	1,683
		22.97%
County: Lowndes GA		
Total:	118,251	46,758
		39.54%
Voting Age	89,031	33,302
		37.40%
County: Pierce GA		
Total:	19,716	1,801
		9.13%
Voting Age	14,899	1,262
		8.47%
County: Ware GA		
Total:	25,820	7,284
		28.21%
Voting Age	20,016	5,387
		26.91%
District 8 Total		
Total:	192,396	61,785
		32.11%
Voting Age	145,144	44,098
		30.38%
District 9		
County: Gwinnett GA		
Total:	192,915	61,009
		31.62%
Voting Age	142,054	41,948
		29.53%
District 9 Total		
Total:	192,915	61,009
		31.62%
Voting Age	142,054	41,948
		29.53%
District 10		
County: Butts GA		
Total:	25,434	7,212
		28.36%
Voting Age	20,360	5,660
		27.80%
County: DeKalb GA		
Total:	82,066	78,042
		95.10%
Voting Age	63,260	60,044
		94.92%
County: Henry GA		
Total:	62,505	22,655
		36.25%
Voting Age	47,084	16,528
		35.10%
County: Rockdale GA		

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Total:	22,596	11,509
		50.93%
Voting Age	17,865	8,544
		47.83%
District 10 Total		
Total:	192,601	119,418
		62.00%
Voting Age	148,569	90,776
		61.10%
District 11		
County: Brooks GA		
Total:	16,301	5,958
		36.55%
Voting Age	12,747	4,357
		34.18%
County: Colquitt GA		
Total:	45,898	10,648
		23.20%
Voting Age	34,193	7,461
		21.82%
County: Cook GA		
Total:	17,229	5,014
		29.10%
Voting Age	12,938	3,595
		27.79%
County: Decatur GA		
Total:	29,367	12,583
		42.85%
Voting Age	22,443	9,189
		40.94%
County: Grady GA		
Total:	26,236	7,693
		29.32%
Voting Age	19,962	5,678
		28.44%
County: Seminole GA		
Total:	9,147	3,093
		33.81%
Voting Age	7,277	2,275
		31.26%
County: Thomas GA		
Total:	45,798	16,975
		37.06%
Voting Age	35,037	12,332
		35.20%
District 11 Total		
Total:	189,976	61,964
		32.62%
Voting Age	144,597	44,887
		31.04%
District 12		
County: Baker GA		
Total:	2,876	1,178
		40.96%

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Voting Age	2,275	932 40.97%
County: Calhoun GA		
Total:	5,573	3,629 65.12%
Voting Age	4,687	2,998 63.96%
County: Clay GA		
Total:	2,848	1,634 57.37%
Voting Age	2,246	1,231 54.81%
County: Dougherty GA		
Total:	85,790	61,457 71.64%
Voting Age	66,266	45,631 68.86%
County: Early GA		
Total:	10,854	5,688 52.40%
Voting Age	8,315	4,075 49.01%
County: Miller GA		
Total:	6,000	1,831 30.52%
Voting Age	4,749	1,358 28.60%
County: Mitchell GA		
Total:	21,755	10,394 47.78%
Voting Age	17,065	7,917 46.39%
County: Quitman GA		
Total:	2,235	965 43.18%
Voting Age	1,870	765 40.91%
County: Randolph GA		
Total:	6,425	3,947 61.43%
Voting Age	4,977	2,913 58.53%
County: Stewart GA		
Total:	5,314	2,538 47.76%
Voting Age	4,617	2,048 44.36%
County: Sumter GA		
Total:	29,616	15,546 52.49%
Voting Age	23,036	11,479 49.83%
County: Terrell GA		
Total:	9,185	5,707

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		62.13%
Voting Age	7,204	4,274
		59.33%
County: Webster GA		
Total:	2,348	1,107
		47.15%
Voting Age	1,847	844
		45.70%
District 12 Total		
Total:	190,819	115,621
		60.59%
Voting Age	149,154	86,465
		57.97%
District 13		
County: Ben Hill GA		
Total:	17,194	6,537
		38.02%
Voting Age	13,165	4,745
		36.04%
County: Berrien GA		
Total:	18,160	2,198
		12.10%
Voting Age	13,690	1,499
		10.95%
County: Coffee GA		
Total:	19,881	4,080
		20.52%
Voting Age	14,865	2,978
		20.03%
County: Crisp GA		
Total:	20,128	9,194
		45.68%
Voting Age	15,570	6,603
		42.41%
County: Irwin GA		
Total:	9,666	2,333
		24.14%
Voting Age	7,547	1,720
		22.79%
County: Lee GA		
Total:	33,163	7,755
		23.38%
Voting Age	24,676	5,503
		22.30%
County: Tift GA		
Total:	41,344	12,734
		30.80%
Voting Age	31,224	8,963
		28.71%
County: Turner GA		
Total:	9,006	3,813
		42.34%
Voting Age	6,960	2,752
		39.54%

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

County: Wilcox GA		
Total:	5,579	1,866
		33.45%
Voting Age	4,705	1,669
		35.47%
County: Worth GA		
Total:	20,784	5,517
		26.54%
Voting Age	16,444	4,108
		24.98%
District 13 Total		
Total:	194,905	56,027
		28.75%
Voting Age	148,846	40,540
		27.24%
District 14		
County: Fulton GA		
Total:	192,533	37,409
		19.43%
Voting Age	155,340	29,470
		18.97%
District 14 Total		
Total:	192,533	37,409
		19.43%
Voting Age	155,340	29,470
		18.97%
District 15		
County: Chattahoochee GA		
Total:	9,565	1,825
		19.08%
Voting Age	7,199	1,287
		17.88%
County: Macon GA		
Total:	12,082	7,296
		60.39%
Voting Age	9,938	6,021
		60.59%
County: Marion GA		
Total:	7,498	2,223
		29.65%
Voting Age	5,854	1,687
		28.82%
County: Muscogee GA		
Total:	142,205	87,188
		61.31%
Voting Age	107,284	63,629
		59.31%
County: Schley GA		
Total:	4,547	933
		20.52%
Voting Age	3,328	644
		19.35%
County: Talbot GA		
Total:	5,733	3,145

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		54.86%
Voting Age	4,783	2,537
		53.04%
County: Taylor GA		
Total:	7,816	2,946
		37.69%
Voting Age	6,120	2,235
		36.52%
District 15 Total		
Total:	189,446	105,556
		55.72%
Voting Age	144,506	78,040
		54.00%
District 16		
County: Coweta GA		
Total:	39,894	3,351
		8.40%
Voting Age	30,518	2,478
		8.12%
County: Fayette GA		
Total:	45,488	5,070
		11.15%
Voting Age	34,787	3,585
		10.31%
County: Lamar GA		
Total:	18,500	5,220
		28.22%
Voting Age	14,541	4,017
		27.63%
County: Pike GA		
Total:	18,889	1,613
		8.54%
Voting Age	14,337	1,254
		8.75%
County: Spalding GA		
Total:	67,306	24,522
		36.43%
Voting Age	52,123	17,511
		33.60%
District 16 Total		
Total:	190,077	39,776
		20.93%
Voting Age	146,306	28,845
		19.72%
District 17		
County: Baldwin GA		
Total:	16,966	5,718
		33.70%
Voting Age	13,458	4,215
		31.32%
County: Greene GA		
Total:	14,168	3,654
		25.79%
Voting Age	11,692	2,698

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		23.08%
County: Jasper GA		
Total:	14,588	2,676
		18.34%
Voting Age	11,118	1,966
		17.68%
County: Jones GA		
Total:	28,347	7,114
		25.10%
Voting Age	21,575	5,341
		24.76%
County: Morgan GA		
Total:	20,097	4,339
		21.59%
Voting Age	15,574	3,280
		21.06%
County: Newton GA		
Total:	9,333	1,544
		16.54%
Voting Age	7,166	1,113
		15.53%
County: Oglethorpe GA		
Total:	14,825	2,468
		16.65%
Voting Age	11,639	1,853
		15.92%
County: Putnam GA		
Total:	22,047	5,701
		25.86%
Voting Age	17,847	4,229
		23.70%
County: Walton GA		
Total:	44,590	7,994
		17.93%
Voting Age	33,470	5,536
		16.54%
County: Wilkinson GA		
Total:	8,877	3,330
		37.51%
Voting Age	7,026	2,549
		36.28%
District 17 Total		
Total:	193,838	44,538
		22.98%
Voting Age	150,565	32,780
		21.77%
District 18		
County: Crawford GA		
Total:	12,130	2,455
		20.24%
Voting Age	9,606	1,938
		20.17%
County: Houston GA		
Total:	96,912	30,579

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		31.55%
Voting Age	73,167	21,685
		29.64%
County: Monroe GA		
Total:	27,957	6,444
		23.05%
Voting Age	21,913	5,068
		23.13%
County: Peach GA		
Total:	27,981	12,645
		45.19%
Voting Age	22,111	9,720
		43.96%
County: Upson GA		
Total:	27,700	8,324
		30.05%
Voting Age	21,711	6,202
		28.57%
District 18 Total		
Total:	192,680	60,447
		31.37%
Voting Age	148,508	44,613
		30.04%
District 19		
County: Appling GA		
Total:	18,444	3,647
		19.77%
Voting Age	13,958	2,540
		18.20%
County: Bacon GA		
Total:	11,140	1,970
		17.68%
Voting Age	8,310	1,245
		14.98%
County: Coffee GA		
Total:	23,211	8,495
		36.60%
Voting Age	17,554	6,213
		35.39%
County: Jeff Davis GA		
Total:	14,779	2,493
		16.87%
Voting Age	10,856	1,752
		16.14%
County: Long GA		
Total:	16,168	4,734
		29.28%
Voting Age	11,234	3,107
		27.66%
County: Montgomery GA		
Total:	8,610	2,224
		25.83%
Voting Age	6,792	1,781
		26.22%

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

County: Tattnall GA		
Total:	22,842	6,331 27.72%
Voting Age	17,654	4,886 27.68%
County: Telfair GA		
Total:	12,477	4,754 38.10%
Voting Age	10,190	3,806 37.35%
County: Toombs GA		
Total:	27,030	7,402 27.38%
Voting Age	20,261	5,036 24.86%
County: Wayne GA		
Total:	30,144	6,390 21.20%
Voting Age	23,105	4,662 20.18%
County: Wheeler GA		
Total:	7,471	2,949 39.47%
Voting Age	6,217	2,561 41.19%
District 19 Total		
Total:	192,316	51,389 26.72%
Voting Age	146,131	37,589 25.72%
District 20		
County: Bleckley GA		
Total:	12,583	2,951 23.45%
Voting Age	9,613	2,036 21.18%
County: Dodge GA		
Total:	19,925	6,148 30.86%
Voting Age	15,709	4,725 30.08%
County: Dooly GA		
Total:	11,208	5,652 50.43%
Voting Age	9,187	4,526 49.27%
County: Emanuel GA		
Total:	22,768	7,556 33.19%
Voting Age	17,320	5,404 31.20%
County: Houston GA		
Total:	33,532	7,767 23.16%

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Voting Age	24,548	5,417 22.07%
County: Jenkins GA		
Total:	8,674	3,638 41.94%
Voting Age	7,005	2,843 40.59%
County: Johnson GA		
Total:	9,189	3,124 34.00%
Voting Age	7,474	2,513 33.62%
County: Laurens GA		
Total:	49,570	19,132 38.60%
Voting Age	37,734	13,695 36.29%
County: Pulaski GA		
Total:	9,855	3,250 32.98%
Voting Age	8,012	2,564 32.00%
County: Treutlen GA		
Total:	6,406	2,114 33.00%
Voting Age	4,934	1,514 30.69%
County: Twiggs GA		
Total:	8,022	3,226 40.21%
Voting Age	6,589	2,627 39.87%
County: Wilcox GA		
Total:	3,187	1,295 40.63%
Voting Age	2,513	1,024 40.75%
District 20 Total		
Total:	194,919	65,853 33.78%
Voting Age	150,638	48,888 32.45%
District 21		
County: Cherokee GA		
Total:	109,034	6,259 5.74%
Voting Age	82,623	4,208 5.09%
County: Fulton GA		
Total:	83,538	9,233 11.05%
Voting Age	62,497	6,615 10.58%
District 21 Total		

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Total:	192,572	15,492
		8.04%
Voting Age	145,120	10,823
		7.46%
District 22		
County: Columbia GA		
Total:	30,174	10,351
		34.30%
Voting Age	21,768	6,970
		32.02%
County: Richmond GA		
Total:	158,756	91,758
		57.80%
Voting Age	124,698	67,487
		54.12%
District 22 Total		
Total:	188,930	102,109
		54.05%
Voting Age	146,466	74,457
		50.84%
District 23		
County: Baldwin GA		
Total:	26,833	13,267
		49.44%
Voting Age	22,274	10,300
		46.24%
County: Burke GA		
Total:	24,596	11,430
		46.47%
Voting Age	18,778	8,362
		44.53%
County: Glascock GA		
Total:	2,884	226
		7.84%
Voting Age	2,236	167
		7.47%
County: Greene GA		
Total:	4,747	2,373
		49.99%
Voting Age	3,666	1,772
		48.34%
County: Hancock GA		
Total:	8,735	6,131
		70.19%
Voting Age	7,487	5,108
		68.22%
County: Jefferson GA		
Total:	15,709	8,208
		52.25%
Voting Age	12,301	6,324
		51.41%
County: McDuffie GA		
Total:	12,164	7,350
		60.42%

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Voting Age	9,042	5,130 56.74%
County: Richmond GA		
Total:	47,851	28,212 58.96%
Voting Age	36,201	20,443 56.47%
County: Screven GA		
Total:	14,067	5,527 39.29%
Voting Age	10,893	4,144 38.04%
County: Taliaferro GA		
Total:	1,559	876 56.19%
Voting Age	1,289	722 56.01%
County: Warren GA		
Total:	5,215	3,128 59.98%
Voting Age	4,159	2,360 56.74%
County: Washington GA		
Total:	19,988	10,969 54.88%
Voting Age	15,709	8,333 53.05%
County: Wilkes GA		
Total:	3,747	2,465 65.79%
Voting Age	2,873	1,840 64.04%
District 23 Total		
Total:	188,095	100,162 53.25%
Voting Age	146,908	75,005 51.06%
District 24		
County: Columbia GA		
Total:	125,836	22,165 17.61%
Voting Age	93,055	15,303 16.45%
County: Elbert GA		
Total:	19,637	5,520 28.11%
Voting Age	15,493	4,122 26.61%
County: Hart GA		
Total:	25,828	4,732 18.32%
Voting Age	20,436	3,447 16.87%
County: Lincoln GA		

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Total:	7,690	2,212
		28.76%
Voting Age	6,270	1,728
		27.56%
County: McDuffie GA		
Total:	9,468	1,695
		17.90%
Voting Age	7,573	1,295
		17.10%
County: Wilkes GA		
Total:	5,818	1,524
		26.19%
Voting Age	4,778	1,231
		25.76%
District 24 Total		
Total:	194,277	37,848
		19.48%
Voting Age	147,605	27,126
		18.38%
District 25		
County: Clayton GA		
Total:	37,295	29,368
		78.75%
Voting Age	27,594	21,280
		77.12%
County: Henry GA		
Total:	155,413	88,923
		57.22%
Voting Age	115,669	63,144
		54.59%
District 25 Total		
Total:	192,708	118,291
		61.38%
Voting Age	143,263	84,424
		58.93%
District 26		
County: Bibb GA		
Total:	157,346	88,865
		56.48%
Voting Age	120,902	64,270
		53.16%
County: Houston GA		
Total:	33,189	18,174
		54.76%
Voting Age	24,403	12,503
		51.24%
District 26 Total		
Total:	190,535	107,039
		56.18%
Voting Age	145,305	76,773
		52.84%
District 27		
County: Forsyth GA		
Total:	190,676	10,506

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		5.51%
Voting Age	139,196	6,961
		5.00%
District 27 Total		
Total:	190,676	10,506
		5.51%
Voting Age	139,196	6,961
		5.00%
District 28		
County: Clayton GA		
Total:	19,071	15,696
		82.30%
Voting Age	14,534	12,068
		83.03%
County: Coweta GA		
Total:	74,804	20,264
		27.09%
Voting Age	56,582	14,367
		25.39%
County: Fayette GA		
Total:	17,678	9,748
		55.14%
Voting Age	13,709	7,429
		54.19%
County: Fulton GA		
Total:	78,143	65,444
		83.75%
Voting Age	58,266	48,095
		82.54%
District 28 Total		
Total:	189,696	111,152
		58.59%
Voting Age	143,091	81,959
		57.28%
District 29		
County: Harris GA		
Total:	34,668	5,742
		16.56%
Voting Age	26,799	4,431
		16.53%
County: Meriwether GA		
Total:	20,613	7,547
		36.61%
Voting Age	16,526	5,845
		35.37%
County: Muscogee GA		
Total:	64,717	15,024
		23.21%
Voting Age	49,768	10,672
		21.44%
County: Troup GA		
Total:	69,426	25,473
		36.69%
Voting Age	52,581	18,202

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		34.62%
District 29 Total		
Total:	189,424	53,786
		28.39%
Voting Age	145,674	39,150
		26.88%
District 30		
County: Carroll GA		
Total:	119,148	24,618
		20.66%
Voting Age	90,996	17,827
		19.59%
County: Coweta GA		
Total:	31,460	4,674
		14.86%
Voting Age	24,055	3,351
		13.93%
County: Haralson GA		
Total:	29,919	1,541
		5.15%
Voting Age	22,854	1,106
		4.84%
County: Heard GA		
Total:	11,412	1,142
		10.01%
Voting Age	8,698	832
		9.57%
District 30 Total		
Total:	191,939	31,975
		16.66%
Voting Age	146,603	23,116
		15.77%
District 31		
County: Paulding GA		
Total:	149,902	35,238
		23.51%
Voting Age	110,217	23,946
		21.73%
County: Polk GA		
Total:	42,853	5,816
		13.57%
Voting Age	32,238	3,991
		12.38%
District 31 Total		
Total:	192,755	41,054
		21.30%
Voting Age	142,455	27,937
		19.61%
District 32		
County: Cherokee GA		
Total:	90,981	9,461
		10.40%
Voting Age	69,190	6,571
		9.50%

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

County: Cobb GA		
Total:	101,467	20,578
		20.28%
Voting Age	80,689	15,703
		19.46%
District 32 Total		
Total:	192,448	30,039
		15.61%
Voting Age	149,879	22,274
		14.86%
District 33		
County: Cobb GA		
Total:	192,694	84,864
		44.04%
Voting Age	146,415	62,897
		42.96%
District 33 Total		
Total:	192,694	84,864
		44.04%
Voting Age	146,415	62,897
		42.96%
District 34		
County: Clayton GA		
Total:	135,995	98,239
		72.24%
Voting Age	98,847	71,113
		71.94%
County: Fayette GA		
Total:	56,028	17,258
		30.80%
Voting Age	43,302	12,714
		29.36%
District 34 Total		
Total:	192,023	115,497
		60.15%
Voting Age	142,149	83,827
		58.97%
District 35		
County: Douglas GA		
Total:	144,237	74,260
		51.48%
Voting Age	108,428	53,377
		49.23%
County: Fulton GA		
Total:	30,198	27,771
		91.96%
Voting Age	22,906	20,845
		91.00%
County: Paulding GA		
Total:	18,759	6,058
		32.29%
Voting Age	13,781	4,218
		30.61%
District 35 Total		

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Total:	193,194	108,089
		55.95%
Voting Age	145,115	78,440
		54.05%
District 36		
County: Fulton GA		
Total:	192,282	104,523
		54.36%
Voting Age	161,385	82,859
		51.34%
District 36 Total		
Total:	192,282	104,523
		54.36%
Voting Age	161,385	82,859
		51.34%
District 37		
County: Bartow GA		
Total:	11,130	646
		5.80%
Voting Age	8,818	435
		4.93%
County: Cobb GA		
Total:	181,541	39,545
		21.78%
Voting Age	138,961	28,049
		20.18%
District 37 Total		
Total:	192,671	40,191
		20.86%
Voting Age	147,779	28,484
		19.27%
District 38		
County: Cobb GA		
Total:	102,964	44,999
		43.70%
Voting Age	79,498	33,840
		42.57%
County: Fulton GA		
Total:	87,641	83,029
		94.74%
Voting Age	66,587	63,096
		94.76%
District 38 Total		
Total:	190,605	128,028
		67.17%
Voting Age	146,085	96,936
		66.36%
District 39		
County: Fulton GA		
Total:	190,184	119,401
		62.78%
Voting Age	155,780	93,789
		60.21%
District 39 Total		

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Total:	190,184	119,401
		62.78%
Voting Age	155,780	93,789
		60.21%
District 40		
County: DeKalb GA		
Total:	164,997	27,095
		16.42%
Voting Age	127,423	21,898
		17.19%
County: Gwinnett GA		
Total:	25,547	8,624
		33.76%
Voting Age	19,577	6,379
		32.58%
District 40 Total		
Total:	190,544	35,719
		18.75%
Voting Age	147,000	28,277
		19.24%
District 41		
County: DeKalb GA		
Total:	183,560	120,328
		65.55%
Voting Age	139,591	90,016
		64.49%
County: Gwinnett GA		
Total:	7,463	1,434
		19.21%
Voting Age	5,687	945
		16.62%
District 41 Total		
Total:	191,023	121,762
		63.74%
Voting Age	145,278	90,961
		62.61%
District 42		
County: DeKalb GA		
Total:	190,153	55,060
		28.96%
Voting Age	153,285	44,597
		29.09%
District 42 Total		
Total:	190,153	55,060
		28.96%
Voting Age	153,285	44,597
		29.09%
District 43		
County: DeKalb GA		
Total:	17,660	15,789
		89.41%
Voting Age	13,478	11,964
		88.77%
County: Newton GA		

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Total:	103,150	54,357
		52.70%
Voting Age	77,582	39,320
		50.68%
County: Rockdale GA		
Total:	70,974	45,695
		64.38%
Voting Age	53,638	33,391
		62.25%
District 43 Total		
Total:	191,784	115,841
		60.40%
Voting Age	144,698	84,675
		58.52%
District 44		
County: Clayton GA		
Total:	105,234	73,048
		69.41%
Voting Age	79,603	54,393
		68.33%
County: DeKalb GA		
Total:	60,228	50,225
		83.39%
Voting Age	47,783	39,047
		81.72%
County: Henry GA		
Total:	22,794	13,633
		59.81%
Voting Age	17,220	9,985
		57.98%
District 44 Total		
Total:	188,256	136,906
		72.72%
Voting Age	144,606	103,425
		71.52%
District 45		
County: Barrow GA		
Total:	39,217	5,033
		12.83%
Voting Age	29,707	3,514
		11.83%
County: Gwinnett GA		
Total:	151,475	32,509
		21.46%
Voting Age	110,999	22,635
		20.39%
District 45 Total		
Total:	190,692	37,542
		19.69%
Voting Age	140,706	26,149
		18.58%
District 46		
County: Barrow GA		
Total:	17,116	3,573

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		20.88%
Voting Age	12,083	2,401
		19.87%
County: Clarke GA		
Total:	52,016	9,024
		17.35%
Voting Age	45,312	6,731
		14.85%
County: Gwinnett GA		
Total:	27,298	9,493
		34.78%
Voting Age	19,469	6,372
		32.73%
County: Oconee GA		
Total:	41,799	2,280
		5.45%
Voting Age	30,221	1,660
		5.49%
County: Walton GA		
Total:	52,083	10,810
		20.76%
Voting Age	39,628	7,629
		19.25%
District 46 Total		
Total:	190,312	35,180
		18.49%
Voting Age	146,713	24,793
		16.90%
District 47		
County: Barrow GA		
Total:	27,172	3,301
		12.15%
Voting Age	20,405	2,307
		11.31%
County: Clarke GA		
Total:	76,655	24,648
		32.15%
Voting Age	61,518	18,045
		29.33%
County: Jackson GA		
Total:	56,660	4,393
		7.75%
Voting Age	41,564	2,966
		7.14%
County: Madison GA		
Total:	30,120	3,196
		10.61%
Voting Age	23,112	2,225
		9.63%
District 47 Total		
Total:	190,607	35,538
		18.64%
Voting Age	146,599	25,543
		17.42%

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

District 48		
County: Forsyth GA		
Total:	60,607	2,716
		4.48%
Voting Age	41,997	1,790
		4.26%
County: Fulton GA		
Total:	83,219	9,960
		11.97%
Voting Age	61,631	7,027
		11.40%
County: Gwinnett GA		
Total:	46,297	6,203
		13.40%
Voting Age	33,367	4,151
		12.44%
District 48 Total		
Total:	190,123	18,879
		9.93%
Voting Age	136,995	12,968
		9.47%
District 49		
County: Hall GA		
Total:	189,355	16,099
		8.50%
Voting Age	144,123	11,475
		7.96%
District 49 Total		
Total:	189,355	16,099
		8.50%
Voting Age	144,123	11,475
		7.96%
District 50		
County: Banks GA		
Total:	18,035	589
		3.27%
Voting Age	13,900	365
		2.63%
County: Franklin GA		
Total:	23,424	2,207
		9.42%
Voting Age	18,307	1,523
		8.32%
County: Habersham GA		
Total:	46,031	2,165
		4.70%
Voting Age	35,878	1,675
		4.67%
County: Hall GA		
Total:	13,781	907
		6.58%
Voting Age	9,721	619
		6.37%
County: Jackson GA		

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Total:	19,247	1,755
		9.12%
Voting Age	14,887	1,302
		8.75%
County: Rabun GA		
Total:	16,883	210
		1.24%
Voting Age	13,767	129
		0.94%
County: Stephens GA		
Total:	26,784	3,527
		13.17%
Voting Age	21,163	2,467
		11.66%
County: Towns GA		
Total:	12,493	168
		1.34%
Voting Age	10,923	137
		1.25%
County: White GA		
Total:	12,642	198
		1.57%
Voting Age	10,253	124
		1.21%
District 50 Total		
Total:	189,320	11,726
		6.19%
Voting Age	148,799	8,341
		5.61%
District 51		
County: Dawson GA		
Total:	26,798	392
		1.46%
Voting Age	21,441	249
		1.16%
County: Fannin GA		
Total:	25,319	199
		0.79%
Voting Age	21,188	133
		0.63%
County: Gilmer GA		
Total:	31,353	296
		0.94%
Voting Age	25,417	161
		0.63%
County: Lumpkin GA		
Total:	33,488	685
		2.05%
Voting Age	27,689	507
		1.83%
County: Pickens GA		
Total:	33,216	512
		1.54%
Voting Age	26,799	319

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		1.19%
County: Union GA		
Total:	24,632	228
		0.93%
Voting Age	20,808	147
		0.71%
County: White GA		
Total:	15,361	523
		3.40%
Voting Age	12,229	360
		2.94%
District 51 Total		
Total:	190,167	2,835
		1.49%
Voting Age	155,571	1,876
		1.21%
District 52		
County: Bartow GA		
Total:	97,771	12,749
		13.04%
Voting Age	74,752	8,942
		11.96%
County: Floyd GA		
Total:	85,090	14,081
		16.55%
Voting Age	65,739	10,019
		15.24%
County: Gordon GA		
Total:	7,938	266
		3.35%
Voting Age	6,129	159
		2.59%
District 52 Total		
Total:	190,799	27,096
		14.20%
Voting Age	146,620	19,120
		13.04%
District 53		
County: Catoosa GA		
Total:	67,872	2,642
		3.89%
Voting Age	52,448	1,684
		3.21%
County: Chattooga GA		
Total:	24,965	2,865
		11.48%
Voting Age	19,416	2,235
		11.51%
County: Dade GA		
Total:	16,251	228
		1.40%
Voting Age	12,987	140
		1.08%
County: Floyd GA		

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

Total:	13,494	1,525 11.30%
Voting Age	10,556	1,045 9.90%
County: Walker GA		
Total:	67,654	3,664 5.42%
Voting Age	52,794	2,454 4.65%
District 53 Total		
Total:	190,236	10,924 5.74%
Voting Age	148,201	7,558 5.10%
District 54		
County: Gordon GA		
Total:	49,606	2,653 5.35%
Voting Age	37,371	1,780 4.76%
County: Murray GA		
Total:	39,973	556 1.39%
Voting Age	30,210	321 1.06%
County: Whitfield GA		
Total:	102,864	4,919 4.78%
Voting Age	76,262	3,349 4.39%
District 54 Total		
Total:	192,443	8,128 4.22%
Voting Age	143,843	5,450 3.79%
District 55		
County: DeKalb GA		
Total:	65,718	60,912 92.69%
Voting Age	50,456	46,664 92.48%
County: Gwinnett GA		
Total:	124,437	67,133 53.95%
Voting Age	91,512	46,995 51.35%
District 55 Total		
Total:	190,155	128,045 67.34%
Voting Age	141,968	93,659 65.97%
District 56		
County: Cherokee GA		
Total:	66,605	5,967

Plan Components with Population Detail

Grant_Esselstyn_Sen_12_05

		8.96%
Voting Age	51,115	4,197
		8.21%
County: Cobb GA		
Total:	89,893	6,696
		7.45%
Voting Age	66,553	4,697
		7.06%
County: Fulton GA		
Total:	34,728	2,792
		8.04%
Voting Age	26,780	2,046
		7.64%
District 56 Total		
Total:	191,226	15,455
		8.08%
Voting Age	144,448	10,940
		7.57%

EXHIBIT 7

User:

Plan Name: Grant_Esselstyn_Sen_12_05

Plan Type:

Core Constituencies

Core Constituencies

Grant_Esselstyn_Sen_12_05

From Plan: GA_Senate illus-Grant

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 1 -- **191,402 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 1	191,402 (100.00%)	51,779 (100.00%)	145,428 (100.00%)	36,468 (100.00%)
Total and % Population		51,779 (27.05%)	145,428 (75.98%)	36,468 (19.05%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 10 -- **192,601 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 10	192,601 (100.00%)	119,418 (100.00%)	148,569 (100.00%)	90,776 (100.00%)
Total and % Population		119,418 (62.00%)	148,569 (77.14%)	90,776 (47.13%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 11 -- **189,976 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 11	189,976 (100.00%)	61,964 (100.00%)	144,597 (100.00%)	44,887 (100.00%)
Total and % Population		61,964 (32.62%)	144,597 (76.11%)	44,887 (23.63%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 12 -- **190,819 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 12	190,819 (100.00%)	115,621 (100.00%)	149,154 (100.00%)	86,465 (100.00%)
Total and % Population		115,621 (60.59%)	149,154 (78.17%)	86,465 (45.31%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 13 -- **194,905 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 13	194,905 (100.00%)	56,027 (100.00%)	148,846 (100.00%)	40,540 (100.00%)
Total and % Population		56,027 (28.75%)	148,846 (76.37%)	40,540 (20.80%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 14 -- **192,533 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 14	192,533 (100.00%)	37,409 (100.00%)	155,340 (100.00%)	29,470 (100.00%)
Total and % Population		37,409 (19.43%)	155,340 (80.68%)	29,470 (15.31%)

Core Constituencies

Grant_Esselstyn_Sen_12_05

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 15 --**189,446 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 15	189,446 (100.00%)	105,556 (100.00%)	144,506 (100.00%)	78,040 (100.00%)
Total and % Population		105,556 (55.72%)	144,506 (76.28%)	78,040 (41.19%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 16 --**190,077 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 16	186,338 (98.03%)	38,968 (97.97%)	143,280 (97.93%)	28,240 (97.90%)
Dist. 34	3,739 (1.97%)	808 (2.03%)	3,026 (2.07%)	605 (2.10%)
Total and % Population		39,776 (20.93%)	146,306 (76.97%)	28,845 (15.18%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 17 --**193,838 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 17	184,949 (95.41%)	41,658 (93.53%)	143,616 (95.38%)	30,784 (93.91%)
Dist. 23	8,889 (4.59%)	2,880 (6.47%)	6,949 (4.62%)	1,996 (6.09%)
Total and % Population		44,538 (22.98%)	150,565 (77.68%)	32,780 (16.91%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 18 --**192,680 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 18	192,680 (100.00%)	60,447 (100.00%)	148,508 (100.00%)	44,613 (100.00%)
Total and % Population		60,447 (31.37%)	148,508 (77.07%)	44,613 (23.15%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 19 --**192,316 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 19	192,316 (100.00%)	51,389 (100.00%)	146,131 (100.00%)	37,589 (100.00%)
Total and % Population		51,389 (26.72%)	146,131 (75.98%)	37,589 (19.55%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 2 --**190,408 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 2	190,408 (100.00%)	95,717 (100.00%)	150,843 (100.00%)	70,688 (100.00%)
Total and % Population		95,717 (50.27%)	150,843 (79.22%)	70,688 (37.12%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 20 --**194,919 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 20	194,919 (100.00%)	65,853 (100.00%)	150,638 (100.00%)	48,888 (100.00%)
Total and % Population		65,853 (33.78%)	150,638 (77.28%)	48,888 (25.08%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 21 --**192,572 Total Population**

Core Constituencies

Grant_Esselstyn_Sen_12_05

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 21	192,572 (100.00%)	15,492 (100.00%)	145,120 (100.00%)	10,823 (100.00%)
Total and % Population		15,492 (8.04%)	145,120 (75.36%)	10,823 (5.62%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 22 -- **188,930 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 22	188,930 (100.00%)	102,109 (100.00%)	146,466 (100.00%)	74,457 (100.00%)
Total and % Population		102,109 (54.05%)	146,466 (77.52%)	74,457 (39.41%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 23 -- **188,095 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 17	4,263 (2.27%)	1,606 (1.60%)	3,475 (2.37%)	1,163 (1.55%)
Dist. 23	183,832 (97.73%)	98,556 (98.40%)	143,433 (97.63%)	73,842 (98.45%)
Total and % Population		100,162 (53.25%)	146,908 (78.10%)	75,005 (39.88%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 24 -- **194,277 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 24	194,277 (100.00%)	37,848 (100.00%)	147,605 (100.00%)	27,126 (100.00%)
Total and % Population		37,848 (19.48%)	147,605 (75.98%)	27,126 (13.96%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 25 -- **192,708 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 25	192,708 (100.00%)	118,291 (100.00%)	143,263 (100.00%)	84,424 (100.00%)
Total and % Population		118,291 (61.38%)	143,263 (74.34%)	84,424 (43.81%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 26 -- **190,535 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 26	190,535 (100.00%)	107,039 (100.00%)	145,305 (100.00%)	76,773 (100.00%)
Total and % Population		107,039 (56.18%)	145,305 (76.26%)	76,773 (40.29%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 27 -- **190,676 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 27	190,676 (100.00%)	10,506 (100.00%)	139,196 (100.00%)	6,961 (100.00%)
Total and % Population		10,506 (5.51%)	139,196 (73.00%)	6,961 (3.65%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 28 -- **189,696 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 28	189,696 (100.00%)	111,152 (100.00%)	143,091 (100.00%)	81,959 (100.00%)

Core Constituencies

Grant_Esselstyn_Sen_12_05

Total and % Population	111,152 (58.59%)	143,091 (75.43%)	81,959 (43.21%)
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Plan: Grant_Esselstyn_Sen_illustrative12_05, District 29 -- **189,424 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 29	189,424 (100.00%)	53,786 (100.00%)	145,674 (100.00%)	39,150 (100.00%)
Total and % Population		53,786 (28.39%)	145,674 (76.90%)	39,150 (20.67%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 3 -- **191,212 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 3	191,212 (100.00%)	44,238 (100.00%)	148,915 (100.00%)	31,545 (100.00%)
Total and % Population		44,238 (23.14%)	148,915 (77.88%)	31,545 (16.50%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 30 -- **191,939 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 30	191,939 (100.00%)	31,975 (100.00%)	146,603 (100.00%)	23,116 (100.00%)
Total and % Population		31,975 (16.66%)	146,603 (76.38%)	23,116 (12.04%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 31 -- **192,755 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 31	192,755 (100.00%)	41,054 (100.00%)	142,455 (100.00%)	27,937 (100.00%)
Total and % Population		41,054 (21.30%)	142,455 (73.90%)	27,937 (14.49%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 32 -- **192,448 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 32	192,448 (100.00%)	30,039 (100.00%)	149,879 (100.00%)	22,274 (100.00%)
Total and % Population		30,039 (15.61%)	149,879 (77.88%)	22,274 (11.57%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 33 -- **192,694 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 33	192,694 (100.00%)	84,864 (100.00%)	146,415 (100.00%)	62,897 (100.00%)
Total and % Population		84,864 (44.04%)	146,415 (75.98%)	62,897 (32.64%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 34 -- **192,023 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 16	7,525 (3.92%)	650 (0.56%)	5,636 (3.96%)	438 (0.52%)
Dist. 34	184,498 (96.08%)	114,847 (99.44%)	136,513 (96.04%)	83,389 (99.48%)
Total and % Population		115,497 (60.15%)	142,149 (74.03%)	83,827 (43.65%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District **193,194 Total Population**

Core Constituencies

Grant_Esselstyn_Sen_12_05

35 --

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 35	193,194 (100.00%)	108,089 (100.00%)	145,115 (100.00%)	78,440 (100.00%)
Total and % Population		108,089 (55.95%)	145,115 (75.11%)	78,440 (40.60%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 192,282 Total Population**36 --**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 36	192,282 (100.00%)	104,523 (100.00%)	161,385 (100.00%)	82,859 (100.00%)
Total and % Population		104,523 (54.36%)	161,385 (83.93%)	82,859 (43.09%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 192,671 Total Population**37 --**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 37	192,671 (100.00%)	40,191 (100.00%)	147,779 (100.00%)	28,484 (100.00%)
Total and % Population		40,191 (20.86%)	147,779 (76.70%)	28,484 (14.78%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 190,605 Total Population**38 --**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 38	190,605 (100.00%)	128,028 (100.00%)	146,085 (100.00%)	96,936 (100.00%)
Total and % Population		128,028 (67.17%)	146,085 (76.64%)	96,936 (50.86%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 190,184 Total Population**39 --**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 39	190,184 (100.00%)	119,401 (100.00%)	155,780 (100.00%)	93,789 (100.00%)
Total and % Population		119,401 (62.78%)	155,780 (81.91%)	93,789 (49.31%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 191,098 Total Population**4 --**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 4	191,098 (100.00%)	47,061 (100.00%)	146,443 (100.00%)	34,217 (100.00%)
Total and % Population		47,061 (24.63%)	146,443 (76.63%)	34,217 (17.91%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 190,544 Total Population**40 --**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 40	190,544 (100.00%)	35,719 (100.00%)	147,000 (100.00%)	28,277 (100.00%)
Total and % Population		35,719 (18.75%)	147,000 (77.15%)	28,277 (14.84%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 191,023 Total Population**41 --**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
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Core Constituencies

Grant_Esselstyn_Sen_12_05

Dist. 41	191,023 (100.00%)	121,762 (100.00%)	145,278 (100.00%)	90,961 (100.00%)
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Total and % Population 121,762 (63.74%) 145,278 (76.05%) 90,961 (47.62%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 42 -- 190,153 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 42	190,153 (100.00%)	55,060 (100.00%)	153,285 (100.00%)	44,597 (100.00%)

Total and % Population 55,060 (28.96%) 153,285 (80.61%) 44,597 (23.45%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 43 -- 191,784 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 43	191,784 (100.00%)	115,841 (100.00%)	144,698 (100.00%)	84,675 (100.00%)

Total and % Population 115,841 (60.40%) 144,698 (75.45%) 84,675 (44.15%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 44 -- 188,256 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 44	188,256 (100.00%)	136,906 (100.00%)	144,606 (100.00%)	103,425 (100.00%)

Total and % Population 136,906 (72.72%) 144,606 (76.81%) 103,425 (54.94%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 45 -- 190,692 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 45	190,692 (100.00%)	37,542 (100.00%)	140,706 (100.00%)	26,149 (100.00%)

Total and % Population 37,542 (19.69%) 140,706 (73.79%) 26,149 (13.71%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 46 -- 190,312 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 46	190,312 (100.00%)	35,180 (100.00%)	146,713 (100.00%)	24,793 (100.00%)

Total and % Population 35,180 (18.49%) 146,713 (77.09%) 24,793 (13.03%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 47 -- 190,607 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 47	190,607 (100.00%)	35,538 (100.00%)	146,599 (100.00%)	25,543 (100.00%)

Total and % Population 35,538 (18.64%) 146,599 (76.91%) 25,543 (13.40%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 48 -- 190,123 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 48	190,123 (100.00%)	18,879 (100.00%)	136,995 (100.00%)	12,968 (100.00%)

Total and % Population 18,879 (9.93%) 136,995 (72.06%) 12,968 (6.82%)

Core Constituencies

Grant_Esselstyn_Sen_12_05

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 49 -- **189,355 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 49	189,355 (100.00%)	16,099 (100.00%)	144,123 (100.00%)	11,475 (100.00%)
Total and % Population		16,099 (8.50%)	144,123 (76.11%)	11,475 (6.06%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 5 -- **191,921 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 5	191,921 (100.00%)	57,719 (100.00%)	139,394 (100.00%)	41,736 (100.00%)
Total and % Population		57,719 (30.07%)	139,394 (72.63%)	41,736 (21.75%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 50 -- **189,320 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 50	189,320 (100.00%)	11,726 (100.00%)	148,799 (100.00%)	8,341 (100.00%)
Total and % Population		11,726 (6.19%)	148,799 (78.60%)	8,341 (4.41%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 51 -- **190,167 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 51	190,167 (100.00%)	2,835 (100.00%)	155,571 (100.00%)	1,876 (100.00%)
Total and % Population		2,835 (1.49%)	155,571 (81.81%)	1,876 (0.99%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 52 -- **190,799 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 52	190,799 (100.00%)	27,096 (100.00%)	146,620 (100.00%)	19,120 (100.00%)
Total and % Population		27,096 (14.20%)	146,620 (76.85%)	19,120 (10.02%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 53 -- **190,236 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 53	190,236 (100.00%)	10,924 (100.00%)	148,201 (100.00%)	7,558 (100.00%)
Total and % Population		10,924 (5.74%)	148,201 (77.90%)	7,558 (3.97%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 54 -- **192,443 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 54	192,443 (100.00%)	8,128 (100.00%)	143,843 (100.00%)	5,450 (100.00%)
Total and % Population		8,128 (4.22%)	143,843 (74.75%)	5,450 (2.83%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 55 -- **190,155 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
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Core Constituencies

Grant_Esselstyn_Sen_12_05

Dist. 55	190,155 (100.00%)	128,045 (100.00%)	141,968 (100.00%)	93,659 (100.00%)
Total and % Population		128,045 (67.34%)	141,968 (74.66%)	93,659 (49.25%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 56 -- **191,226 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 56	191,226 (100.00%)	15,455 (100.00%)	144,448 (100.00%)	10,940 (100.00%)
Total and % Population		15,455 (8.08%)	144,448 (75.54%)	10,940 (5.72%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 6 -- **191,834 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 6	191,834 (100.00%)	44,496 (100.00%)	155,742 (100.00%)	35,748 (100.00%)
Total and % Population		44,496 (23.20%)	155,742 (81.19%)	35,748 (18.63%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 7 -- **189,709 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 7	189,709 (100.00%)	43,563 (100.00%)	147,425 (100.00%)	31,601 (100.00%)
Total and % Population		43,563 (22.96%)	147,425 (77.71%)	31,601 (16.66%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 8 -- **192,396 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 8	192,396 (100.00%)	61,785 (100.00%)	145,144 (100.00%)	44,098 (100.00%)
Total and % Population		61,785 (32.11%)	145,144 (75.44%)	44,098 (22.92%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 9 -- **192,915 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 9	192,915 (100.00%)	61,009 (100.00%)	142,054 (100.00%)	41,948 (100.00%)
Total and % Population		61,009 (31.62%)	142,054 (73.64%)	41,948 (21.74%)

EXHIBIT 8

User:

Plan Name: Grant_Esselstyn_Sen_illustrative12_05

Plan Type:

Core Constituencies

Core Constituencies

Grant_Esselstyn_Sen_12_05

From Plan: GA_Senate2021

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 1 -- **191,402 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 001	191,402 (100.00%)	46,451 (100.00%)	51,779 (100.00%)	145,428 (100.00%)	36,468 (100.00%)
Total and % Population		46,451 (24.27%)	51,779 (27.05%)	145,428 (75.98%)	36,468 (19.05%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 10 -- **192,601 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 010	89,018 (46.22%)	73,374 (64.10%)	76,078 (63.71%)	69,423 (46.73%)	58,869 (64.85%)
Dist. 017	36,218 (18.80%)	9,561 (8.35%)	10,276 (8.61%)	26,690 (17.96%)	7,232 (7.97%)
Dist. 025	30,217 (15.69%)	7,270 (6.35%)	7,736 (6.48%)	23,919 (16.10%)	6,035 (6.65%)
Dist. 043	37,148 (19.29%)	24,264 (21.20%)	25,328 (21.21%)	28,537 (19.21%)	18,640 (20.53%)
Total and % Population		114,469 (59.43%)	119,418 (62.00%)	148,569 (77.14%)	90,776 (47.13%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 11 -- **189,976 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 011	189,976 (100.00%)	59,469 (100.00%)	61,964 (100.00%)	144,597 (100.00%)	44,887 (100.00%)
Total and % Population		59,469 (31.30%)	61,964 (32.62%)	144,597 (76.11%)	44,887 (23.63%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 12 -- **190,819 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 012	190,819 (100.00%)	112,733 (100.00%)	115,621 (100.00%)	149,154 (100.00%)	86,465 (100.00%)
Total and % Population		112,733 (59.08%)	115,621 (60.59%)	149,154 (78.17%)	86,465 (45.31%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 13 -- **194,905 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 013	189,326 (97.14%)	51,601 (96.58%)	54,161 (96.67%)	144,141 (96.84%)	38,871 (95.88%)
Dist. 020	5,579 (2.86%)	1,826 (3.42%)	1,866 (3.33%)	4,705 (3.16%)	1,669 (4.12%)
Total and % Population		53,427 (27.41%)	56,027 (28.75%)	148,846 (76.37%)	40,540 (20.80%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 14 -- **192,533 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
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Core Constituencies

Grant_Esselstyn_Sen_12_05

Dist. 014	192,533 (100.00%)	33,017 (100.00%)	37,409 (100.00%)	155,340 (100.00%)	29,470 (100.00%)
Total and % Population		33,017 (17.15%)	37,409 (19.43%)	155,340 (80.68%)	29,470 (15.31%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 15 -- **189,446 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 015	189,446 (100.00%)	100,396 (100.00%)	105,556 (100.00%)	144,506 (100.00%)	78,040 (100.00%)
Total and % Population		100,396 (52.99%)	105,556 (55.72%)	144,506 (76.28%)	78,040 (41.19%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 16 -- **190,077 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 016	150,183 (79.01%)	34,078 (92.14%)	36,425 (91.58%)	115,788 (79.14%)	26,367 (91.41%)
Dist. 028	39,894 (20.99%)	2,906 (7.86%)	3,351 (8.42%)	30,518 (20.86%)	2,478 (8.59%)
Total and % Population		36,984 (19.46%)	39,776 (20.93%)	146,306 (76.97%)	28,845 (15.18%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 17 -- **193,838 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 017	74,020 (38.19%)	12,832 (30.59%)	13,877 (31.16%)	56,210 (37.33%)	9,929 (30.29%)
Dist. 024	28,993 (14.96%)	5,772 (13.76%)	6,122 (13.75%)	23,331 (15.50%)	4,551 (13.88%)
Dist. 025	81,948 (42.28%)	20,164 (48.07%)	21,209 (47.62%)	63,998 (42.51%)	15,751 (48.05%)
Dist. 026	8,877 (4.58%)	3,175 (7.57%)	3,330 (7.48%)	7,026 (4.67%)	2,549 (7.78%)
Total and % Population		41,943 (21.64%)	44,538 (22.98%)	150,565 (77.68%)	32,780 (16.91%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 18 -- **192,680 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 018	138,643 (71.96%)	41,362 (72.60%)	43,686 (72.27%)	107,971 (72.70%)	32,661 (73.21%)
Dist. 020	40,743 (21.15%)	11,574 (20.31%)	12,393 (20.50%)	30,078 (20.25%)	8,821 (19.77%)
Dist. 026	13,294 (6.90%)	4,039 (7.09%)	4,368 (7.23%)	10,459 (7.04%)	3,131 (7.02%)
Total and % Population		56,975 (29.57%)	60,447 (31.37%)	148,508 (77.07%)	44,613 (23.15%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 19 -- **192,316 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 019	192,316 (100.00%)	48,391 (100.00%)	51,389 (100.00%)	146,131 (100.00%)	37,589 (100.00%)
Total and % Population		48,391 (25.16%)	51,389 (26.72%)	146,131 (75.98%)	37,589 (19.55%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 2 -- **190,408 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 002	190,408 (100.00%)	91,457 (100.00%)	95,717 (100.00%)	150,843 (100.00%)	70,688 (100.00%)
Total and % Population		91,457 (48.03%)	95,717 (50.27%)	150,843 (79.22%)	70,688 (37.12%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 20 -- **194,919 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
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Core Constituencies

Grant_Esselstyn_Sen_12_05

Dist. 020	146,266 (75.04%)	46,083 (73.09%)	48,309 (73.36%)	112,250 (74.52%)	35,501 (72.62%)
Dist. 023	31,442 (16.13%)	10,809 (17.14%)	11,194 (17.00%)	24,325 (16.15%)	8,247 (16.87%)
Dist. 026	17,211 (8.83%)	6,156 (9.76%)	6,350 (9.64%)	14,063 (9.34%)	5,140 (10.51%)
Total and % Population		63,048 (32.35%)	65,853 (33.78%)	150,638 (77.28%)	48,888 (25.08%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 21 -- **192,572 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 021	192,572 (100.00%)	12,821 (100.00%)	15,492 (100.00%)	145,120 (100.00%)	10,823 (100.00%)
Total and % Population		12,821 (6.66%)	15,492 (8.04%)	145,120 (75.36%)	10,823 (5.62%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 22 -- **188,930 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 022	158,756 (84.03%)	87,216 (90.55%)	91,758 (89.86%)	124,698 (85.14%)	67,487 (90.64%)
Dist. 023	30,174 (15.97%)	9,103 (9.45%)	10,351 (10.14%)	21,768 (14.86%)	6,970 (9.36%)
Total and % Population		96,319 (50.98%)	102,109 (54.05%)	146,466 (77.52%)	74,457 (39.41%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 23 -- **188,095 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 022	34,407 (18.29%)	23,288 (24.05%)	24,227 (24.19%)	25,752 (17.53%)	17,522 (23.36%)
Dist. 023	89,638 (47.66%)	39,199 (40.48%)	40,730 (40.66%)	69,147 (47.07%)	30,130 (40.17%)
Dist. 024	8,494 (4.52%)	4,696 (4.85%)	4,838 (4.83%)	6,539 (4.45%)	3,612 (4.82%)
Dist. 025	26,833 (14.27%)	12,890 (13.31%)	13,267 (13.25%)	22,274 (15.16%)	10,300 (13.73%)
Dist. 026	28,723 (15.27%)	16,752 (17.30%)	17,100 (17.07%)	23,196 (15.79%)	13,441 (17.92%)
Total and % Population		96,825 (51.48%)	100,162 (53.25%)	146,908 (78.10%)	75,005 (39.88%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 24 -- **194,277 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 023	39,090 (20.12%)	7,484 (22.03%)	8,484 (22.42%)	28,873 (19.56%)	5,786 (21.33%)
Dist. 024	155,187 (79.88%)	26,487 (77.97%)	29,364 (77.58%)	118,732 (80.44%)	21,340 (78.67%)
Total and % Population		33,971 (17.49%)	37,848 (19.48%)	147,605 (75.98%)	27,126 (13.96%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 25 -- **192,708 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 010	72,694 (37.72%)	40,304 (35.93%)	42,677 (36.08%)	54,945 (38.35%)	30,824 (36.51%)
Dist. 017	46,069 (23.91%)	26,260 (23.41%)	27,827 (23.52%)	34,078 (23.79%)	19,523 (23.12%)
Dist. 025	36,650 (19.02%)	17,374 (15.49%)	18,419 (15.57%)	26,646 (18.60%)	12,797 (15.16%)
Dist. 034	3,542 (1.84%)	2,856 (2.55%)	2,988 (2.53%)	2,793 (1.95%)	2,342 (2.77%)
Dist. 044	33,753 (17.52%)	25,393 (22.63%)	26,380 (22.30%)	24,801 (17.31%)	18,938 (22.43%)
Total and % Population		112,187 (58.22%)	118,291 (61.38%)	143,263 (74.34%)	84,424 (43.81%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 26 -- **190,535 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 018	53,182 (27.91%)	16,710 (16.23%)	17,446 (16.30%)	42,225 (29.06%)	13,001 (16.93%)

Core Constituencies

Grant_Esselstyn_Sen_12_05

Dist. 025	15,513 (8.14%)	6,708 (6.51%)	6,992 (6.53%)	12,080 (8.31%)	4,977 (6.48%)
Dist. 026	121,840 (63.95%)	79,566 (77.26%)	82,601 (77.17%)	91,000 (62.63%)	58,795 (76.58%)
Total and % Population		102,984 (54.05%)	107,039 (56.18%)	145,305 (76.26%)	76,773 (40.29%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 27 -- **190,676 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 027	190,676 (100.00%)	8,440 (100.00%)	10,506 (100.00%)	139,196 (100.00%)	6,961 (100.00%)
Total and % Population		8,440 (4.43%)	10,506 (5.51%)	139,196 (73.00%)	6,961 (3.65%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 28 -- **189,696 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 016	6,708 (3.54%)	2,820 (2.65%)	2,991 (2.69%)	4,937 (3.45%)	2,109 (2.57%)
Dist. 028	81,767 (43.10%)	22,011 (20.65%)	23,739 (21.36%)	62,038 (43.36%)	16,902 (20.62%)
Dist. 034	30,041 (15.84%)	21,601 (20.26%)	22,453 (20.20%)	23,306 (16.29%)	17,388 (21.22%)
Dist. 035	64,956 (34.24%)	54,524 (51.14%)	56,148 (50.51%)	48,220 (33.70%)	41,268 (50.35%)
Dist. 039	6,224 (3.28%)	5,656 (5.31%)	5,821 (5.24%)	4,590 (3.21%)	4,292 (5.24%)
Total and % Population		106,612 (56.20%)	111,152 (58.59%)	143,091 (75.43%)	81,959 (43.21%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 29 -- **189,424 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 029	189,424 (100.00%)	50,184 (100.00%)	53,786 (100.00%)	145,674 (100.00%)	39,150 (100.00%)
Total and % Population		50,184 (26.49%)	53,786 (28.39%)	145,674 (76.90%)	39,150 (20.67%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 3 -- **191,212 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 003	191,212 (100.00%)	40,685 (100.00%)	44,238 (100.00%)	148,915 (100.00%)	31,545 (100.00%)
Total and % Population		40,685 (21.28%)	44,238 (23.14%)	148,915 (77.88%)	31,545 (16.50%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 30 -- **191,939 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 028	42,872 (22.34%)	5,187 (18.16%)	5,816 (18.19%)	32,753 (22.34%)	4,183 (18.10%)
Dist. 030	149,067 (77.66%)	23,379 (81.84%)	26,159 (81.81%)	113,850 (77.66%)	18,933 (81.90%)
Total and % Population		28,566 (14.88%)	31,975 (16.66%)	146,603 (76.38%)	23,116 (12.04%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 31 -- **192,755 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 030	9,032 (4.69%)	883 (2.38%)	1,010 (2.46%)	6,796 (4.77%)	680 (2.43%)
Dist. 031	183,723 (95.31%)	36,172 (97.62%)	40,044 (97.54%)	135,659 (95.23%)	27,257 (97.57%)
Total and % Population		37,055 (19.22%)	41,054 (21.30%)	142,455 (73.90%)	27,937 (14.49%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 32 -- **192,448 Total Population**

Core Constituencies

Grant_Esselstyn_Sen_12_05

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 032	192,448 (100.00%)	26,098 (100.00%)	30,039 (100.00%)	149,879 (100.00%)	22,274 (100.00%)
Total and % Population		26,098 (13.56%)	30,039 (15.61%)	149,879 (77.88%)	22,274 (11.57%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 33 -- **192,694 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 033	192,694 (100.00%)	79,359 (100.00%)	84,864 (100.00%)	146,415 (100.00%)	62,897 (100.00%)
Total and % Population		79,359 (41.18%)	84,864 (44.04%)	146,415 (75.98%)	62,897 (32.64%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 34 -- **192,023 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 016	34,938 (18.19%)	6,278 (5.68%)	6,914 (5.99%)	26,408 (18.58%)	4,917 (5.87%)
Dist. 034	157,085 (81.81%)	104,180 (94.32%)	108,583 (94.01%)	115,741 (81.42%)	78,910 (94.13%)
Total and % Population		110,458 (57.52%)	115,497 (60.15%)	142,149 (74.03%)	83,827 (43.65%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 35 -- **193,194 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 028	25,889 (13.40%)	6,165 (6.03%)	6,766 (6.26%)	19,664 (13.55%)	4,719 (6.02%)
Dist. 030	33,376 (17.28%)	14,319 (14.00%)	15,439 (14.28%)	24,431 (16.84%)	10,733 (13.68%)
Dist. 031	8,837 (4.57%)	2,767 (2.71%)	3,020 (2.79%)	6,592 (4.54%)	2,183 (2.78%)
Dist. 035	125,092 (64.75%)	79,033 (77.27%)	82,864 (76.66%)	94,428 (65.07%)	60,805 (77.52%)
Total and % Population		102,284 (52.94%)	108,089 (55.95%)	145,115 (75.11%)	78,440 (40.60%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 36 -- **192,282 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 036	192,282 (100.00%)	99,832 (100.00%)	104,523 (100.00%)	161,385 (100.00%)	82,859 (100.00%)
Total and % Population		99,832 (51.92%)	104,523 (54.36%)	161,385 (83.93%)	82,859 (43.09%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 37 -- **192,671 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 037	192,671 (100.00%)	35,411 (100.00%)	40,191 (100.00%)	147,779 (100.00%)	28,484 (100.00%)
Total and % Population		35,411 (18.38%)	40,191 (20.86%)	147,779 (76.70%)	28,484 (14.78%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 38 -- **190,605 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 035	2,791 (1.46%)	2,563 (2.09%)	2,684 (2.10%)	2,027 (1.39%)	1,946 (2.01%)
Dist. 038	187,814 (98.54%)	120,333 (97.91%)	125,344 (97.90%)	144,058 (98.61%)	94,990 (97.99%)
Total and % Population		122,896 (64.48%)	128,028 (67.17%)	146,085 (76.64%)	96,936 (50.86%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 39 -- **190,184 Total Population**

Core Constituencies

Grant_Esselstyn_Sen_12_05

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 006	4,908 (2.58%)	3,733 (3.25%)	3,810 (3.19%)	4,348 (2.79%)	3,379 (3.60%)
Dist. 039	185,276 (97.42%)	111,096 (96.75%)	115,591 (96.81%)	151,432 (97.21%)	90,410 (96.40%)
Total and % Population		114,829 (60.38%)	119,401 (62.78%)	155,780 (81.91%)	93,789 (49.31%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 4 -- **191,098 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 004	191,098 (100.00%)	43,692 (100.00%)	47,061 (100.00%)	146,443 (100.00%)	34,217 (100.00%)
Total and % Population		43,692 (22.86%)	47,061 (24.63%)	146,443 (76.63%)	34,217 (17.91%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 40 -- **190,544 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 040	190,544 (100.00%)	32,087 (100.00%)	35,719 (100.00%)	147,000 (100.00%)	28,277 (100.00%)
Total and % Population		32,087 (16.84%)	35,719 (18.75%)	147,000 (77.15%)	28,277 (14.84%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 41 -- **191,023 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 041	191,023 (100.00%)	116,500 (100.00%)	121,762 (100.00%)	145,278 (100.00%)	90,961 (100.00%)
Total and % Population		116,500 (60.99%)	121,762 (63.74%)	145,278 (76.05%)	90,961 (47.62%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 42 -- **190,153 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 042	182,791 (96.13%)	48,605 (95.04%)	52,350 (95.08%)	147,119 (95.98%)	42,356 (94.97%)
Dist. 044	7,362 (3.87%)	2,537 (4.96%)	2,710 (4.92%)	6,166 (4.02%)	2,241 (5.03%)
Total and % Population		51,142 (26.90%)	55,060 (28.96%)	153,285 (80.61%)	44,597 (23.45%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 43 -- **191,784 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 017	36,203 (18.88%)	12,264 (11.13%)	13,126 (11.33%)	27,494 (19.00%)	9,561 (11.29%)
Dist. 043	155,581 (81.12%)	97,974 (88.87%)	102,715 (88.67%)	117,204 (81.00%)	75,114 (88.71%)
Total and % Population		110,238 (57.48%)	115,841 (60.40%)	144,698 (75.45%)	84,675 (44.15%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 44 -- **188,256 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 010	31,186 (16.57%)	20,789 (15.79%)	21,640 (15.81%)	23,516 (16.26%)	15,978 (15.45%)
Dist. 042	8,149 (4.33%)	5,898 (4.48%)	6,089 (4.45%)	6,833 (4.73%)	5,027 (4.86%)
Dist. 044	148,921 (79.11%)	104,985 (79.73%)	109,177 (79.75%)	114,257 (79.01%)	82,420 (79.69%)
Total and % Population		131,672 (69.94%)	136,906 (72.72%)	144,606 (76.81%)	103,425 (54.94%)

Plan: Grant_Esselstyn_Sen_illustrative12_05, District 45 -- **190,692 Total Population**

	Population	Black	AP_Bl	[18+_Pop]	[18+_AP_Bl]
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EXHIBIT 6

EXPERT REPORT OF JOHN R. ALFORD, Ph.D.

Scope of Inquiry

I have been retained by the Georgia Secretary of State and State Election Board as an expert to provide analysis related to *Grant v. Raffensperger*, *Alpha Phi Alpha v. Raffensperger*, and *Pendergrass v. Raffensperger*. All three cases allege the current U.S. Congressional, state Senate, and state House districts in Georgia violate Section 2 of the Voting Rights Act. In early 2022, I provided a report and testified in the preliminary injunction hearing in this matter. I have examined the reports and supplemental reports provided by plaintiffs' experts Dr. Maxwell Palmer, and Dr. Lisa Handley in this case. My rate of compensation in this matter is \$500 per hour.

Qualifications

I am a tenured full professor of political science at Rice University. At Rice, I have taught courses on redistricting, elections, political representation, voting behavior and statistical methods at both the undergraduate and graduate level. Over the last thirty years, I have worked with numerous local governments on districting plans and on Voting Rights Act issues. I have previously provided expert reports and/or testified as an expert witness in voting rights and statistical issues in a variety of court cases, including on behalf of the U.S. Attorney in Houston, the Texas Attorney General, a U.S. Congressman, and various cities and school districts.

In the 2000 round of redistricting, I was retained as an expert to provide advice to the Texas Attorney General in his role as Chair of the Legislative Redistricting Board. I subsequently served as the expert for the State of Texas in the state and federal litigation involving the 2001 redistricting for U.S. Congress, the Texas Senate, the Texas House of Representatives, and the Texas State Board of Education. In the 2010 round of redistricting in Texas, I was again retained as an expert by the State of Texas to assist in defending various state election maps and systems including the district maps for the U.S. Congress, the Texas Senate, the Texas House of Representatives, and the current at large system for electing Justices to the State Supreme Court

and Court of Appeals, as well as the winner-take-all system for allocating Electoral College votes.

I have also worked as an expert on redistricting and voting rights cases at the state and/or local level in Alabama, Arkansas, Florida, Georgia, Kansas, Louisiana, Michigan, Mississippi, New Mexico, New York, Pennsylvania, Washington, and Wisconsin. The details of my academic background, including all publications in the last ten years, and work as an expert, including all cases in which I have testified by deposition or at trial in the last four years, are covered in the attached CV (Appendix 1).

Data and Sources

In preparing this report, I have reviewed the reports filed by the plaintiffs' experts in this case. I have relied on the analysis provided to date by Dr. Palmer and Dr. Handley in their expert reports in this case. I have also relied on various election and demographic data provided by Dr. Palmer and Dr. Handley in their disclosures related to their reports in this case. In addition, I relied on data on turnout by race for the 2022 Republican Primary election provided to counsel by the Georgia Secretary of State, and 2022 precinct-level election results for that election downloaded from the publicly available website of the Georgia Secretary of State.

Dr. Palmer's Reports

Dr. Palmer, in his report in *Pendergrass v. Raffensperger* dated 12/12/2022, provides the results of an EI election analysis that he used to assess Racially Polarized Voting (RPV) in each of 40 contests between 2012 and 2022, and reports the results in his Tables 1 through 6 for five U.S. Congressional districts and as a combined focus area. Similarly, in his report in *Grant v. Raffensperger* dated 12/12/2022, Dr. Palmer provides the EI results for the same 40 contests between 2012 and 2022 as reported in his Tables 2 through 6, for three Georgia House and two Georgia Senate focus areas. The race of the candidate preferred by Black voters is indicated in Dr. Palmer's tables with an asterisk by the name of each Black candidate, and the absence of an asterisk indicating a non-Black candidate. Across the 40 reported contests 19 of the preferred candidates are Black and 21 are non-Black, providing an ideal, almost equal distribution, for comparing both Black and white voter support for Black-preferred candidates that happen to be Black, with Black voter support for Black-preferred candidates that happen not to be Black.

However, despite having this data identified in his reports and the associated opportunity analyze it, there is no discussion of the impact, if any, that the race of the candidate might have on the behavior of Black or white voters in these contests. Also, Dr. Palmer provides no party labels in these tables, and does not mention the party of candidates in his discussion of the results of his analysis.

As evident in Dr. Palmer's Tables 1-6 in his *Pendergrass* report, and Tables 2-6 in his *Grant* report, the pattern of polarization is quite striking. Black voter support for their preferred candidate is typically in the 90 percent range and scarcely varies at all across the ten years examined from 2012 to 2022. Nor does it vary in any meaningful degree from the top of the ballot elections for U.S. President to down-ballot contests like Public Service Commissioner. While slightly more varied, estimated white voter opposition to the Black-preferred candidate is typically above 80 percent. In the *Pendergrass* Table 1 for the combined focus area, Dr. Palmer reports estimates of Black voter support that only varies between 96 and 99 percent when results are rounded to the nearest percent. White voter opposition to the Black preferred candidate is slightly more varied, but still remarkably stable, ranging in *Pendergrass* Table 1 only from 84.5% to 91.4 percent.

What accounts for this remarkable stability in the divergent preferences of Black and white voters across years and offices? It is clearly not Black voter's preference for Black candidates, or white voter's disinclination to vote for Black candidates. At 98.5 percent, the average Black support for the 19 Black candidates identified as Black in Palmer's *Pendergrass* Table 1 is indeed nearly universal, but so is the average 98.4 percent support for the 21 candidates identified as non-Black in Table 1. Similarly, the average white vote in opposition to the 19 candidates identified as Black in *Pendergrass* Table 1 is a clearly cohesive 88.1 percent, but so is the average 87.1 percent white voter opposition to the 21 candidates identified as non-Black. The same can said for Dr. Palmer's results in his *Grant* report where, for example, the average Black support for the 19 candidates identified as Black in Table 2 is 98.2 percent, and Black voter support for the 21 candidates identified as non-Black is a nearly identical 98.1 percent. Similarly, the average white vote in opposition to the 19 candidates identified as Black in *Grant* Table 2 is a clearly cohesive 90.1 percent, but so is the average 89.1 percent white voter opposition to the 21 candidates identified as non-Black.

If we do consider the party affiliation of the candidates, the pattern over these election contests is stark in both the *Grant* report and the *Pendergrass* report. In all 40 contests the candidate of choice of Black voters is the Democrat and the candidate of choice of white voters is the Republican.

In contrast, the race of the candidates does not appear to be influential. Black voter support for Black Democratic candidates is certainly high, as Dr. Palmer's Tables 2 through 6 in *Grant* and Tables 1 through 5 in *Pendergrass* clearly show, but those same figures also show Black voter support in the same high range for white Democratic candidates as it is for Black Democratic candidates. Similarly, white voter support for Black Democratic candidates is very low, but white voter support for white Democratic candidates is also very low.¹ In other words, there appears to be just one overarching attribute of candidates that uniformly leads to their relative acceptability or unacceptability among white voters and Black voters alike. And it is not the candidate's race. It is their party affiliation.

For example, in the 2022 contest for Governor in Dr. Palmer's *Pendergrass* Table 1 (his combined focus region) Stacey Abrams, the Black Democratic candidate, gets an estimated 98.5% of the Black vote, but in the same election in the adjacent Lt. Governor contest Charlie Bailey, a white Democrat, gets an almost identical estimated 98.4% of the Black vote. Looking at White voters a similar pattern is clear. Abrams gets an estimated 10.3% of the white vote, but in the same election in the adjacent Lt. Governor contest Baily, the white Democrat, received a similar estimated 12.1% of the white vote.

Similarly, in the 2021 U.S. Senate runoffs in Dr. Palmer's *Pendergrass* Table 1 (his combined focus region) Raphael Warnock, the Black Democratic candidate gets an estimated 98.7% of the Black vote, but in the same election in the other Senate contest Jon Ossoff, a white Democrat gets an identical estimated 98.7% of the Black vote. Looking at white voters a similar pattern is clear. Warnock, the Black Democratic candidate, gets an estimated 15.2% of the white vote, but in the same election in the other Senate contest, Ossoff, the White Democrat, gets an almost identical estimated 14.5% of the white vote.

¹ The limited evidence from the 2022 endogenous elections provided in Dr. Palmer's supplemental reports do not contradict this broad pattern.

Moving beyond his EI analysis, Dr. Palmer also provides reconstituted election results to demonstrate the success rate of Black preferred candidates in his focus areas. Given that as mentioned above the Black preferred candidate is always the Democratic candidate and given the dominance of political party in the EI results as discussed above, it is no surprise that these tables show stable performance for Democratic candidates across the 40 contests, regardless of race. For example, in Dr. Palmer's Table 7 in his *Pendergrass* report, the average vote share for the Democratic candidate is 41.7 percent in the 19 contests where the Democratic candidate is Black, and a very similar 42.3 percent in the 21 contests where the Democratic candidate is not Black.

In short, all that Dr. Palmer's analysis demonstrates is that Black voters provide uniformly high levels of support for Democratic candidates and white voters provide uniformly high levels of support for Republican candidates. There is no indication in these EI results that the high levels of Black voter support for Democratic candidates is connected in any meaningful way to the race of the Democratic or Republican candidates. Similarly, there is no indication in these results that the high levels of white voter support for the Republican candidates is connected in any meaningful way to the race of the Democratic or Republican candidates.

Dr. Handley's Report

Dr. Handley's December 12, 2022 report in *Alpha Phi Alpha* focuses first on general elections, and reports results similar to those reported by Dr. Palmer. Black voters support Democratic candidates and white voters support Republican candidates. She indicates that she has chosen to focus on racially contested elections, so this limits the ability to see whether this partisan pattern varies at all with the race of the candidates, but in the two contests without a Black Democrat, the Ossoff 2020 Senate contest and 2021 runoff, the results for both Black and White voters are very similar to the results for the racially contested elections, as was the case in Dr. Palmer's larger set of general elections.

Unlike Dr. Palmer, Dr. Handley also analyzes eleven racially contested statewide Democratic primaries. The results in these primaries are very different from the general election patterns. The general election pattern is a very important contrast to keep in mind when evaluating the results for these eleven primary contests. In the general elections, Black support for the Democratic candidate is very high and very stable in the upper 90% range. Similarly,

White voter opposition to the Democratic candidates is also high and stable in the 80 percent and up range.

While there is not currently a bright-line court standard for determining the level of support needed under *Gingles* prongs 2 and 3 to demonstrate cohesion, multiple plaintiffs' experts have recently discussed a minimum of 60 percent threshold for cohesion in a two-person contest. Simply having a preferred candidate (50 percent plus 1 in a two-candidate contest) is not sufficient. This is, of course, true by definition. If simply having a preferred candidate was sufficient to establish cohesion, then the *Gingles* 2 threshold test would always be met in two candidate contests and thus not actually constitute a test at all. As Dr. Palmer notes on page 4 of his *Pendergrass* report, "[i]f the group's support is roughly evenly divided between the two candidates, then the group does not cohesively support a single candidate". Even if a more stringent 75 percent or 80 percent threshold was the cohesion threshold standard, the results for the general elections provided by both Dr. Palmer and Dr. Handley clearly establish partisan polarization, with Blacks always favoring Democratic candidates at stable levels well above 80 percent, and whites favoring Republican candidates at similarly stable levels, typically above 80 percent.

Applying the 60 percent threshold for cohesion to the 40 general election contests in Dr. Palmer's *Grant* report or the 40 general election contests in Dr. Palmer's *Pendergrass* report, produces the same clear result. In 40 out of 40 contests, Black voters provide cohesive support to the Democratic candidate and white voters provide cohesive support to the opposing Republican candidate. This unequivocal result is what Palmer references as supporting his conclusion of polarized voting. As he states on pages 5-6 of his December 12, 2022 *Grant* report:

Black voters are extremely cohesive, with a clear candidate of choice in all 40 elections. In contrast to Black voters, Figure 2 shows that White voters are highly cohesive in voting in opposition to the Black-preferred candidate in every election across the five focus areas. Table 1 lists the average level of support for the Black-preferred candidate for Black and White voters in each focus area. Across all five focus areas, Black voters support their preferred candidate with an average of 98.5% and a minimum of 95.2% of the vote, and White voters support Black-preferred candidates with an average of 8.3% and a maximum of 17.7% of the vote. This is strong evidence of racially polarized voting across all five focus areas.

The same can be said for the 16 general election contests that Dr. Handley includes for each of her seven focus regions as reported in her Appendix C1-C7. In every one of the 16 contests examined in all seven regions, Black voter support for the Democratic candidate clearly exceeds 60 percent and in all the regular elections (excluding the one 20 candidate special Senate election in 2020) exceeded 90 percent. White voters provided cohesive support to the opposing Republican candidates exceeding 60% in every contest with the sole exception of the 2022 Senate contest in Appendix 1, where the white estimated vote fell just short of 60 percent at 59.3 percent.

As Dr. Handley, herself, states on page 9 of her December 23, 2022 Report:

Overall, the average percentage of Black vote for the 16 Black-preferred candidates is 96.1%. The average percentage of White vote for these 16 Black-preferred candidates across the seven areas is 11.2%. (When Ossoff is excluded, and only Black-preferred Black candidates are considered, the average White vote is slightly lower: 11.1 %.) The highest average White vote for any of the 16 candidates is 14.4% for Raphael Warnock in his 2022 general election bid for re-election. While the percentage of White support for candidates preferred by Black voters varies across the areas, in five of the seven areas the average did not even reach 10%. White crossover voting was the highest in the Eastern Atlanta Metro Region (Map 1), but only about one third of White voters typically supported the Black-preferred Black candidates in this area.

She finds similarly clear evidence of polarization when she considers the analysis of state legislative elections included in her Appendix B1 and B2, stating on page 9 of her December 23, 2022:

Nearly every one of the 54 of the state legislative elections analyzed (53 of the 54 contests, or 98.1%) was racially polarized. The estimates of Black and White support for the state legislative candidates in these contests analyzed can be found in Appendices B1 (State Senate) and B2 (State House). Black voters were quite cohesive in supporting Black candidates in these state legislative contests: on average, 97.4% of Black voters supported their preferred Black state senate candidates, and 91.5% supported their preferred Black state house candidate. Very few White voters supported these candidates, however: Black-preferred Black state senate candidates garnered, on average, 10.1% of the White vote; Black-preferred Black state house candidates received, on average, 9.8% of the White vote.

Based on their summary descriptions of their general election analysis, it is clear that both Dr. Palmer and Dr. Handley know what a convincing pattern of polarization looks like. That clear pattern is not present once candidate party labels are removed from the contest. Dr. Palmer

makes no effort to address this issue of conflating polarization in support for Democratic versus Republican candidates with racial polarization. Dr. Handley attempts to address the issue by providing analysis for eleven Democratic primaries in each of her seven focus regions.

But looking at the Democratic primary contests, as reported in Dr. Handley's Appendix C1-C7, the contrast to the pattern in the partisan general elects is stark. As detailed above, the pattern of Black voter support for Democratic candidates and white voter support for their Republican opponents in general elections is near universal, and both Black and white voters show strong and highly stable levels of cohesion. In contrast the pattern Dr. Handley identifies in the Democratic primaries is far from universal or stable. The support of Black voters for Black candidates varies widely, and seldom reaches above 80 percent. Similarly, white voter support for Democratic candidates is typically below 20% in the general elections, but in the primaries white support for Black candidates varies widely and is often fairly evenly divided. In many of the contests within Dr. Handley's six focus regions, for example, the votes of Blacks, whites, or both are divided too evenly to characterize the voting as cohesive. Even ignoring any concern for establishing minority or majority cohesion and applying a very loose standard of Blacks and whites simply preferring different candidates, Dr. Handley is only able to conclude that "the majority (55.8%) of the contests I analyzed were racially polarized" (page 10), a level not much above chance, and far below the 100 percent or 98.1 percent reported for general elections.

If we consider the *Gingles* 2 and 3 cohesion thresholds, even this slight result disappears. Using even a modest 60% standard for voter cohesion, Black voters vote cohesively for Black candidates in only 35 contests out of 77 (46 percent). If we add the instances where Blacks vote cohesively for white candidate that rises to 49 contests (64 percent of the 77 total). In those 49 contests, white voters cohesively opposed the Black preference in only 10 contests (20 percent of the 49 contests).

Herschel Walker Senate Race

The recent 2022 Republican U.S. Senate primary provides an additional racially contested primary to consider. Among the six candidates, the majority winner was Herschel Walker, one of the three Black candidates. Given that Black voters were less than 12 percent of the voters in any county in the state in that primary, and that Walker received a majority of the vote in every county in Georgia, it is clear the Walker was the preferred candidate among White voters

in the Republican primary. This can be seen as well in an initial look at EI estimates for the area covered in Dr. Handley's Appendix A1, reproduced below in Table 1 (Eastern Atlanta Metro Region – Map Area 1, Dekalb, Henry, Morgan, Newton, Rockdale, and Walton). With an estimated 62 percent support among Black voters, and 67 percent support among white voters, Walker is the preferred candidate of both Black and white voters in the Republican primary.

Table 1; Ecological Estimates of Voting Patterns by Race in the 2022 Republican U.S. Senate Primary for Dr. Handley's Eastern Atlanta Metro Region

			95% Confidence Interval			95% Confidence Interval			95% Confidence Interval	
Last Name	Candidate Race	Black support	Low	High	White Support	Low	High	Other Support	Low	High
Herschel Walker	Black	62.4%	57.8%	67.4%	67.0%	66.3%	67.6%	5.3%	1.8%	11.7%
Kelvin King	Black	10.1%	7.7%	12.8%	2.5%	2.0%	3.0%	17.5%	12.5%	22.5%
"Jon" McCollum	Black	3.0%	1.7%	4.8%	0.9%	0.6%	1.2%	22.4%	18.8%	25.4%
Gary Black	white	12.8%	9.6%	16.2%	15.3%	14.5%	16.0%	9.3%	3.3%	17.0%
Latham Saddler	white	7.1%	4.1%	10.7%	12.7%	11.9%	13.5%	15.7%	7.8%	24.0%
Josh Clark	white	4.5%	2.7%	6.8%	1.6%	1.1%	2.2%	29.8%	23.7%	35.3%

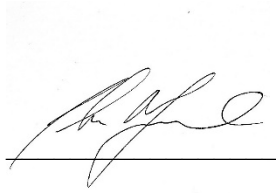
Summary Conclusions

The partisan general election analysis report by Dr. Palmer and Dr. Handley show that Black voters cohesively support Democratic candidates, regardless of whether those candidates are Black or White. Similarly, white voters cohesively vote for Republican candidates, and in opposition to Democratic candidates, regardless of whether those Democratic candidates are Black or white. Thus, it is cohesive Black voter support for *Democratic* candidates, and white voter support for *Republican* candidates that the general election analysis reveals, not cohesive Black voter support for *Black* candidates and white voter support for *white* candidates.

Nonetheless, the voting pattern is clearly one of partisan polarized voting, with both highly cohesive Black vote for the Democrat and highly cohesive white vote for the Republican candidate. The more limited analysis of Democratic primaries reported by Dr. Handley shows a very different picture of voting behavior from the general elections. Nothing even approaching the levels of Black and white cohesion seen in the general elections appears anywhere in the

primary contests, and the overall patterns are mixed and variable even within the same set of voters on the same day as we see in the multiple contests in the 2018 Democratic primary. Similarly, the 2022 U.S. Senate Republican primary indicates that white Republican primary voters are willing to support a Black Republican candidate over multiple white opponents.

February 6, 2023

A handwritten signature in black ink, appearing to read "John R. Alford", is written over a horizontal line.

John R. Alford, Ph.D.

Appendix 1

CV

John R. Alford
Curriculum Vitae
January 2023

Dept. of Political Science
Rice University - MS-24
P.O. Box 1892
Houston, Texas 77251-1892
713-348-3364
jra@rice.edu

Employment:

Professor, Rice University, 2015 to present.
Associate Professor, Rice University, 1985-2015.
Assistant Professor, University of Georgia, 1981-1985.
Instructor, Oakland University, 1980-1981.
Teaching-Research Fellow, University of Iowa, 1977-1980.
Research Associate, Institute for Urban Studies, Houston, Texas, 1976-1977.

Education:

Ph.D., University of Iowa, Political Science, 1981.
M.A., University of Iowa, Political Science, 1980.
M.P.A., University of Houston, Public Administration, 1977.
B.S., University of Houston, Political Science, 1975.

Books:

Predisposed: Liberals, Conservatives, and the Biology of Political Differences. New York: Routledge, 2013. Co-authors, John R. Hibbing and Kevin B. Smith.

Articles:

“Political Orientations Vary with Detection of Androstenone,” with Amanda Friesen, Michael Gruszczynski, and Kevin B. Smith. **Politics and the Life Sciences.** (Spring, 2020).

“Intuitive ethics and political orientations: Testing moral foundations as a theory of political ideology.” with Kevin Smith, John Hibbing, Nicholas Martin, and Peter Hatemi. **American Journal of Political Science.** (April, 2017).

“The Genetic and Environmental Foundations of Political, Psychological, Social, and Economic Behaviors: A Panel Study of Twins and Families.” with Peter Hatemi, Kevin Smith, and John Hibbing. **Twin Research and Human Genetics.** (May, 2015.)

“Liberals and conservatives: Non-convertible currencies.” with John R. Hibbing and Kevin B. Smith. **Behavioral and Brain Sciences** (January, 2015).

“Non-Political Images Evoke Neural Predictors Of Political Ideology.” with Woo-Young Ahn, Kenneth T. Kishida, Xiaosi Gu, Terry Lohrenz, Ann Harvey, Kevin Smith, Gideon Yaffe, John Hibbing, Peter Dayan, P. Read Montague. **Current Biology.** (November, 2014).

“Cortisol and Politics: Variance in Voting Behavior is Predicted by Baseline Cortisol Levels.” with Jeffrey French, Kevin Smith, Adam Guck, Andrew Birnie, and John Hibbing. **Physiology & Behavior**. (June, 2014).

“Differences in Negativity Bias Underlie Variations in Political Ideology.” with Kevin B. Smith and John R. Hibbing. **Behavioral and Brain Sciences**. (June, 2014).

“Negativity bias and political preferences: A response to commentators Response.” with Kevin B. Smith and John R. Hibbing. **Behavioral and Brain Sciences**. (June, 2014).

“Genetic and Environmental Transmission of Political Orientations.” with Carolyn L. Funk, Matthew Hibbing, Kevin B. Smith, Nicholas R. Eaton, Robert F. Krueger, Lindon J. Eaves, John R. Hibbing. **Political Psychology**, (December, 2013).

“Biology, Ideology, and Epistemology: How Do We Know Political Attitudes Are Inherited and Why Should We Care?” with Kevin Smith, Peter K. Hatemi, Lindon J. Eaves, Carolyn Funk, and John R. Hibbing. **American Journal of Political Science**. (January, 2012)

“Disgust Sensitivity and the Neurophysiology of Left-Right Political Orientations.” with Kevin Smith, John Hibbing, Douglas Oxley, and Matthew Hibbing, **PlosONE**, (October, 2011).

“Linking Genetics and Political Attitudes: Re-Conceptualizing Political Ideology.” with Kevin Smith, John Hibbing, Douglas Oxley, and Matthew Hibbing, **Political Psychology**, (June, 2011).

“The Politics of Mate Choice.” with Peter Hatemi, John R. Hibbing, Nicholas Martin and Lindon Eaves, **Journal of Politics**, (March, 2011).

“Not by Twins Alone: Using the Extended Twin Family Design to Investigate the Genetic Basis of Political Beliefs” with Peter Hatemi, John Hibbing, Sarah Medland, Matthew Keller, Kevin Smith, Nicholas Martin, and Lindon Eaves, **American Journal of Political Science**, (July, 2010).

“The Ultimate Source of Political Opinions: Genes and the Environment” with John R. Hibbing in **Understanding Public Opinion**, 3rd Edition eds. Barbara Norrander and Clyde Wilcox, Washington D.C.: CQ Press, (2010).

“Is There a ‘Party’ in your Genes” with Peter Hatemi, John R. Hibbing, Nicholas Martin and Lindon Eaves, **Political Research Quarterly**, (September, 2009).

“Twin Studies, Molecular Genetics, Politics, and Tolerance: A Response to Beckwith and Morris” with John R. Hibbing and Cary Funk, **Perspectives on Politics**, (December, 2008). This is a solicited response to a critique of our 2005 APSR article “Are Political Orientations Genetically Transmitted?”

“Political Attitudes Vary with Physiological Traits” with Douglas R. Oxley, Kevin B. Smith, Matthew V. Hibbing, Jennifer L. Miller, Mario Scalora, Peter K. Hatemi, and John R. Hibbing, **Science**, (September 19, 2008).

“The New Empirical Biopolitics” with John R. Hibbing, **Annual Review of Political Science**, (June, 2008).

“Beyond Liberals and Conservatives to Political Genotypes and Phenotypes” with John R. Hibbing and Cary Funk, **Perspectives on Politics**, (June, 2008). This is a solicited response to a critique of our 2005 APSR article “Are Political Orientations Genetically Transmitted?”

"Personal, Interpersonal, and Political Temperaments" with John R. Hibbing, **Annals of the American Academy of Political and Social Science**, (November, 2007).

"Is Politics in our Genes?" with John R. Hibbing, **Tidsskriftet Politik**, (February, 2007).

"Biology and Rational Choice" with John R. Hibbing, **The Political Economist**, (Fall, 2005)

"Are Political Orientations Genetically Transmitted?" with John R. Hibbing and Carolyn Funk, **American Political Science Review**, (May, 2005). (The main findings table from this article has been reprinted in two college level text books - Psychology, 9th ed. and Invitation to Psychology 4th ed. both by Wade and Tavis, Prentice Hall, 2007).

"The Origin of Politics: An Evolutionary Theory of Political Behavior" with John R. Hibbing, **Perspectives on Politics**, (December, 2004).

"Accepting Authoritative Decisions: Humans as Wary Cooperators" with John R. Hibbing, **American Journal of Political Science**, (January, 2004).

"Electoral Convergence of the Two Houses of Congress" with John R. Hibbing, in **The Exceptional Senate**, ed. Bruce Oppenheimer, Columbus: Ohio State University Press, (2002).

"We're All in this Together: The Decline of Trust in Government, 1958-1996." in **What is it About Government that Americans Dislike?**, eds. John Hibbing and Beth Theiss-Morse, Cambridge: Cambridge University Press, (2001).

"The 2000 Census and the New Redistricting," **Texas State Bar Association School Law Section Newsletter**, (July, 2000).

"Overdraft: The Political Cost of Congressional Malfeasance" with Holly Teeters, Dan Ward, and Rick Wilson, **Journal of Politics** (August, 1994).

"Personal and Partisan Advantage in U.S. Congressional Elections, 1846-1990" with David W. Brady, in **Congress Reconsidered** 5th edition, eds. Larry Dodd and Bruce Oppenheimer, CQ Press, (1993).

"The 1990 Congressional Election Results and the Fallacy that They Embodied an Anti-Incumbent Mood" with John R. Hibbing, **PS** 25 (June, 1992).

"Constituency Population and Representation in the United States Senate" with John R. Hibbing. **Legislative Studies Quarterly**, (November, 1990).

"Editors' Introduction: Electing the U.S. Senate" with Bruce I. Oppenheimer. **Legislative Studies Quarterly**, (November, 1990).

"Personal and Partisan Advantage in U.S. Congressional Elections, 1846-1990" with David W. Brady, in **Congress Reconsidered** 4th edition, eds. Larry Dodd and Bruce Oppenheimer, CQ Press, (1988). Reprinted in *The Congress of the United States, 1789-1989*, ed. Joel Silby, Carlson Publishing Inc., (1991), and in *The Quest for Office*, eds. Wayne and Wilcox, St. Martins Press, (1991).

"Can Government Regulate Fertility? An Assessment of Pro-natalist Policy in Eastern Europe" with Jerome Legge. **The Western Political Quarterly** (December, 1986).

"Partisanship and Voting" with James Campbell, Mary Munro, and Bruce Campbell, in **Research in Micropolitics. Volume 1 - Voting Behavior**. Samuel Long, ed. JAI Press, (1986).

"Economic Conditions and Individual Vote in the Federal Republic of Germany" with Jerome S. Legge. **Journal of Politics** (November, 1984).

"Television Markets and Congressional Elections" with James Campbell and Keith Henry. **Legislative Studies Quarterly** (November, 1984).

"Economic Conditions and the Forgotten Side of Congress: A Foray into U.S. Senate Elections" with John R. Hibbing, **British Journal of Political Science** (October, 1982).

"Increased Incumbency Advantage in the House" with John R. Hibbing, **Journal of Politics** (November, 1981). Reprinted in *The Congress of the United States, 1789-1989*, Carlson Publishing Inc., (1991).

"The Electoral Impact of Economic Conditions: Who is Held Responsible?" with John R. Hibbing, **American Journal of Political Science** (August, 1981).

"Comment on Increased Incumbency Advantage" with John R. Hibbing, Refereed communication: **American Political Science Review** (March, 1981).

"Can Government Regulate Safety? The Coal Mine Example" with Michael Lewis-Beck, **American Political Science Review** (September, 1980).

Awards and Honors:

CQ Press Award - 1988, honoring the outstanding paper in legislative politics presented at the 1987 Annual Meeting of the American Political Science Association. Awarded for "The Demise of the Upper House and the Rise of the Senate: Electoral Responsiveness in the United States Senate" with John Hibbing.

Research Grants:

National Science Foundation, 2009-2011, "Identifying the Biological Influences on Political Temperaments", with John Hibbing, Kevin Smith, Kim Espy, Nicolas Martin and Read Montague. This is a collaborative project involving Rice, University of Nebraska, Baylor College of Medicine, and Queensland Institute for Medical Research.

National Science Foundation, 2007-2010, "Genes and Politics: Providing the Necessary Data", with John Hibbing, Kevin Smith, and Lindon Eaves. This is a collaborative project involving Rice, University of Nebraska, Virginia Commonwealth University, and the University of Minnesota.

National Science Foundation, 2007-2010, "Investigating the Genetic Basis of Economic Behavior", with John Hibbing and Kevin Smith. This is a collaborative project involving Rice, University of Nebraska, Virginia Commonwealth University, and the Queensland Institute of Medical Research.

Rice University Faculty Initiatives Fund, 2007-2009, “The Biological Substrates of Political Behavior”. This is in assistance of a collaborative project involving Rice, Baylor College of Medicine, Queensland Institute of Medical Research, University of Nebraska, Virginia Commonwealth University, and the University of Minnesota.

National Science Foundation, 2004-2006, “Decision-Making on Behalf of Others”, with John Hibbing. This is a collaborative project involving Rice and the University of Nebraska.

National Science Foundation, 2001-2002, dissertation grant for Kevin Arceneaux, "Doctoral Dissertation Research in Political Science: Voting Behavior in the Context of U.S. Federalism."

National Science Foundation, 2000-2001, dissertation grant for Stacy Ulbig, "Doctoral Dissertation Research in Political Science: Sub-national Contextual Influences on Political Trust."

National Science Foundation, 1999-2000, dissertation grant for Richard Engstrom, "Doctoral Dissertation Research in Political Science: Electoral District Structure and Political Behavior."

Rice University Research Grant, 1985, Recent Trends in British Parliamentary Elections.

Faculty Research Grants Program, University of Georgia, Summer, 1982. Impact of Media Structure on Congressional Elections, with James Campbell.

Papers Presented:

“The Physiological Basis of Political Temperaments” 6th European Consortium for Political Research General Conference, Reykjavik, Iceland (2011), with Kevin Smith, and John Hibbing.

“Identifying the Biological Influences on Political Temperaments” National Science Foundation Annual Human Social Dynamics Meeting (2010), with John Hibbing, Kimberly Espy, Nicholas Martin, Read Montague, and Kevin B. Smith.

“Political Orientations May Be Related to Detection of the Odor of Androstenone” Annual meeting of the Midwest Political Science Association, Chicago, IL (2010), with Kevin Smith, Amanda Balzer, Michael Gruszczynski, Carly M. Jacobs, and John Hibbing.

“Toward a Modern View of Political Man: Genetic and Environmental Transmission of Political Orientations from Attitude Intensity to Political Participation” Annual meeting of the American Political Science Association, Washington, DC (2010), with Carolyn Funk, Kevin Smith, and John Hibbing.

“Genetic and Environmental Transmission of Political Involvement from Attitude Intensity to Political Participation” Annual meeting of the International Society for Political Psychology, San Francisco, CA (2010), with Carolyn Funk, Kevin Smith, and John Hibbing.

“Are Violations of the EEA Relevant to Political Attitudes and Behaviors?” Annual meeting of the Midwest Political Science Association, Chicago, IL (2010), with Kevin Smith, and John Hibbing.

“The Neural Basis of Representation” Annual meeting of the American Political Science Association, Toronto, Canada (2009), with John Hibbing.

“Genetic and Environmental Transmission of Value Orientations” Annual meeting of the American Political Science Association, Toronto, Canada (2009), with Carolyn Funk, Kevin Smith, Matthew Hibbing, Pete Hatemi, Robert Krueger, Lindon Eaves, and John Hibbing.

“The Genetic Heritability of Political Orientations: A New Twin Study of Political Attitudes” Annual Meeting of the International Society for Political Psychology, Dublin, Ireland (2009), with John Hibbing, Cary Funk, Kevin Smith, and Peter K Hatemi.

“The Heritability of Value Orientations” Annual meeting of the Behavior Genetics Association, Minneapolis, MN (2009), with Kevin Smith, John Hibbing, Carolyn Funk, Robert Krueger, Peter Hatemi, and Lindon Eaves.

“The Ick Factor: Disgust Sensitivity as a Predictor of Political Attitudes” Annual meeting of the Midwest Political Science Association, Chicago, IL (2009), with Kevin Smith, Douglas Oxley Matthew Hibbing, and John Hibbing.

“The Ideological Animal: The Origins and Implications of Ideology” Annual meeting of the American Political Science Association, Boston, MA (2008), with Kevin Smith, Matthew Hibbing, Douglas Oxley, and John Hibbing.

“The Physiological Differences of Liberals and Conservatives” Annual meeting of the Midwest Political Science Association, Chicago, IL (2008), with Kevin Smith, Douglas Oxley, and John Hibbing.

“Looking for Political Genes: The Influence of Serotonin on Political and Social Values” Annual meeting of the Midwest Political Science Association, Chicago, IL (2008), with Peter Hatemi, Sarah Medland, John Hibbing, and Nicholas Martin.

“Not by Twins Alone: Using the Extended Twin Family Design to Investigate the Genetic Basis of Political Beliefs” Annual meeting of the American Political Science Association, Chicago, IL (2007), with Peter Hatemi, John Hibbing, Matthew Keller, Nicholas Martin, Sarah Medland, and Lindon Eaves.

“Factorial Association: A generalization of the Fulker between-within model to the multivariate case” Annual meeting of the Behavior Genetics Association, Amsterdam, The Netherlands (2007), with Sarah Medland, Peter Hatemi, John Hibbing, William Coventry, Nicholas Martin, and Michael Neale.

“Not by Twins Alone: Using the Extended Twin Family Design to Investigate the Genetic Basis of Political Beliefs” Annual meeting of the Midwest Political Science Association, Chicago, IL (2007), with Peter Hatemi, John Hibbing, Nicholas Martin, and Lindon Eaves.

“Getting from Genes to Politics: The Connecting Role of Emotion-Reading Capability” Annual Meeting of the International Society for Political Psychology, Portland, OR, (2007.), with John Hibbing.

“The Neurological Basis of Representative Democracy.” Hendricks Conference on Political Behavior, Lincoln, NE (2006), with John Hibbing.

“The Neural Basis of Representative Democracy” Annual meeting of the American Political Science Association, Philadelphia, PA (2006), with John Hibbing.

“How are Political Orientations Genetically Transmitted? A Research Agenda” Annual meeting of the Midwest Political Science Association, Chicago Illinois (2006), with John Hibbing.

"The Politics of Mate Choice" Annual meeting of the Southern Political Science Association, Atlanta, GA (2006), with John Hibbing.

"The Challenge Evolutionary Biology Poses for Rational Choice" Annual meeting of the American Political Science Association, Washington, DC (2005), with John Hibbing and Kevin Smith.

"Decision Making on Behalf of Others" Annual meeting of the American Political Science Association, Washington, DC (2005), with John Hibbing.

"The Source of Political Attitudes and Behavior: Assessing Genetic and Environmental Contributions" Annual meeting of the Midwest Political Science Association, Chicago Illinois (2005), with John Hibbing and Carolyn Funk.

"The Source of Political Attitudes and Behavior: Assessing Genetic and Environmental Contributions" Annual meeting of the American Political Science Association, Chicago Illinois (2004), with John Hibbing and Carolyn Funk.

"Accepting Authoritative Decisions: Humans as Wary Cooperators" Annual Meeting of the Midwest Political Science Association, Chicago, Illinois (2002), with John Hibbing

"Can We Trust the NES Trust Measure?" Annual Meeting of the Midwest Political Science Association, Chicago, Illinois (2001), with Stacy Ulbig.

"The Impact of Organizational Structure on the Production of Social Capital Among Group Members" Annual Meeting of the Southern Political Science Association, Atlanta, Georgia (2000), with Allison Rinden.

"Isolating the Origins of Incumbency Advantage: An Analysis of House Primaries, 1956-1998" Annual Meeting of the Southern Political Science Association, Atlanta, Georgia (2000), with Kevin Arceneaux.

"The Electorally Indistinct Senate," Norman Thomas Conference on Senate Exceptionalism, Vanderbilt University; Nashville, Tennessee; October (1999), with John R. Hibbing.

"Interest Group Participation and Social Capital" Annual Meeting of the Midwest Political Science Association, Chicago, Illinois (1999), with Allison Rinden.

"We're All in this Together: The Decline of Trust in Government, 1958-1996." The Hendricks Symposium, University of Nebraska, Lincoln. (1998)

"Constituency Population and Representation in the United States Senate," Electing the Senate; Houston, Texas; December (1989), with John R. Hibbing.

"The Disparate Electoral Security of House and Senate Incumbents," American Political Science Association Annual Meetings; Atlanta, Georgia; September (1989), with John R. Hibbing.

"Partisan and Incumbent Advantage in House Elections," Annual Meeting of the Southern Political Science Association (1987), with David W. Brady.

"Personal and Party Advantage in U.S. House Elections, 1846-1986" with David W. Brady, 1987 Social Science History Association Meetings.

"The Demise of the Upper House and the Rise of the Senate: Electoral Responsiveness in the United States Senate" with John Hibbing, 1987 Annual Meeting of the American Political Science Association.

"A Comparative Analysis of Economic Voting" with Jerome Legge, 1985 Annual Meeting of the American Political Science Association.

"An Analysis of Economic Conditions and the Individual Vote in Great Britain, 1964-1979" with Jerome Legge, 1985 Annual Meeting of the Western Political Science Association.

"Can Government Regulate Fertility? An Assessment of Pro-natalist Policy in Eastern Europe" with Jerome Legge, 1985 Annual Meeting of the Southwestern Social Science Association.

"Economic Conditions and the Individual Vote in the Federal Republic of Germany" with Jerome S. Legge, 1984 Annual Meeting of the Southern Political Science Association.

"The Conditions Required for Economic Issue Voting" with John R. Hibbing, 1984 Annual Meeting of the Midwest Political Science Association.

"Incumbency Advantage in Senate Elections," 1983 Annual Meeting of the Midwest Political Science Association.

"Television Markets and Congressional Elections: The Impact of Market/District Congruence" with James Campbell and Keith Henry, 1982 Annual Meeting of the Southern Political Science Association.

"Economic Conditions and Senate Elections" with John R. Hibbing, 1982 Annual Meeting of the Midwest Political Science Association. "Pocketbook Voting: Economic Conditions and Individual Level Voting," 1982 Annual Meeting of the American Political Science Association.

"Increased Incumbency Advantage in the House," with John R. Hibbing, 1981 Annual Meeting of the Midwest Political Science Association.

Other Conference Participation:

Roundtable Participant – Closing Round-table on Biopolitics; 2016 UC Merced Conference on Bio-Politics and Political Psychology, Merced, CA.

Roundtable Participant "Genes, Brains, and Core Political Orientations" 2008 Annual Meeting of the Southwestern Political Science Association, Las Vegas.

Roundtable Participant "Politics in the Laboratory" 2007 Annual Meeting of the Southern Political Science Association, New Orleans.

Short Course Lecturer, "What Neuroscience has to Offer Political Science" 2006 Annual Meeting of the American Political Science Association.

Panel chair and discussant, "Neuro-scientific Advances in the Study of Political Science" 2006 Annual Meeting of the American Political Science Association.

Presentation, "The Twin Study Approach to Assessing Genetic Influences on Political Behavior" Rice Conference on New Methods for Understanding Political Behavior, 2005.

Panel discussant, "The Political Consequences of Redistricting," 2002 Annual Meeting of the American Political Science Association.

Panel discussant, "Race and Redistricting," 1999 Annual Meeting of the Midwest Political Science Association.

Invited participant, "Roundtable on Public Dissatisfaction with American Political Institutions", 1998 Annual Meeting of the Southwestern Social Science Association.

Presentation, "Redistricting in the '90s," Texas Economic and Demographic Association, 1997.

Panel chair, "Congressional Elections," 1992 Annual Meeting of the Southern Political Science Association.

Panel discussant, "Incumbency and Congressional Elections," 1992 Annual Meeting of the American Political Science Association.

Panel chair, "Issues in Legislative Elections," 1991 Annual Meeting of the Midwest Political Science Association.

Panel chair, "Economic Attitudes and Public Policy in Europe," 1990 Annual Meeting of the Southern Political Science Association

Panel discussant, "Retrospective Voting in U.S. Elections," 1990 Annual Meeting of the Midwest Political Science Association.

Co-convener, with Bruce Oppenheimer, of Electing the Senate, a national conference on the NES 1988 Senate Election Study. Funded by the Rice Institute for Policy Analysis, the University of Houston Center for Public Policy, and the National Science Foundation, Houston, Texas, December, 1989.

Invited participant, Understanding Congress: A Bicentennial Research Conference, Washington, D.C., February, 1989.

Invited participant--Hendricks Symposium on the United States Senate, University of Nebraska, Lincoln, Nebraska, October, 1988

Invited participant--Conference on the History of Congress, Stanford University, Stanford, California, June, 1988.

Invited participant, "Roundtable on Partisan Realignment in the 1980's", 1987 Annual Meeting of the Southern Political Science Association.

Professional Activities:

Other Universities:

Invited Speaker, Annual Lecture, Psi Kappa -the Psychology Club at Houston Community College, 2018.

Invited Speaker, Annual Allman Family Lecture, Dedman College Interdisciplinary Institute, Southern Methodist University, 2016.

Invited Speaker, Annual Lecture, Psi Sigma Alpha – Political Science Dept., Oklahoma State University, 2015.

Invited Lecturer, Department of Political Science, Vanderbilt University, 2014.

Invited Speaker, Annual Lecture, Psi Kappa -the Psychology Club at Houston Community College, 2014.

Invited Speaker, Graduate Student Colloquium, Department of Political Science, University of New Mexico, 2013.

Invited Keynote Speaker, Political Science Alumni Evening, University of Houston, 2013.

Invited Lecturer, Biology and Politics Masters Seminar (John Geer and David Bader), Department of Political Science and Biology Department, Vanderbilt University, 2010.

Invited Lecturer, Biology and Politics Senior Seminar (John Geer and David Bader), Department of Political Science and Biology Department, Vanderbilt University, 2008.

Visiting Fellow, the Hoover Institution, Stanford University, 2007.

Invited Speaker, Joint Political Psychology Graduate Seminar, University of Minnesota, 2007.

Invited Speaker, Department of Political Science, Vanderbilt University, 2006.

Member:

Editorial Board, Journal of Politics, 2007-2008.

Planning Committee for the National Election Studies' Senate Election Study, 1990-92.

Nominations Committee, Social Science History Association, 1988

Reviewer for:

American Journal of Political Science

American Political Science Review

American Politics Research

American Politics Quarterly

American Psychologist

American Sociological Review

Canadian Journal of Political Science

Comparative Politics

Electoral Studies

Evolution and Human Behavior

International Studies Quarterly

Journal of Politics
Journal of Urban Affairs
Legislative Studies Quarterly
National Science Foundation
PLoS ONE
Policy Studies Review
Political Behavior
Political Communication
Political Psychology
Political Research Quarterly
Public Opinion Quarterly
Science
Security Studies
Social Forces
Social Science Quarterly
Western Political Quarterly

University Service:

Member, University Senate, 2021-2023.

Member, University Parking Committee, 2016-2022.

Member, University Benefits Committee, 2013-2016.

Internship Director for the Department of Political Science, 2004-2018.

Member, University Council, 2012-2013.

Invited Speaker, Rice Classroom Connect, 2016.

Invited Speaker, Glasscock School, 2016.

Invited Speaker, Rice Alumni Association, Austin, 2016.

Invited Speaker, Rice Alumni Association, New York City, 2016.

Invited Speaker, Rice TEDxRiceU , 2013.

Invited Speaker, Rice Alumni Association, Atlanta, 2011.

Lecturer, Advanced Topics in AP Psychology, Rice University AP Summer Institute, 2009.

Scientia Lecture Series: “Politics in Our Genes: The Biology of Ideology” 2008

Invited Speaker, Rice Alumni Association, Seattle, San Francisco and Los Angeles, 2008.

Invited Speaker, Rice Alumni Association, Austin, Chicago and Washington, DC, 2006.

Invited Speaker, Rice Alumni Association, Dallas and New York, 2005.

Director: Rice University Behavioral Research Lab and Social Science Computing Lab, 2005-2006.

University Official Representative to the Inter-university Consortium for Political and Social Research, 1989-2012.

Director: Rice University Social Science Computing Lab, 1989-2004.

Member, Rice University Information Technology Access and Security Committee, 2001-2002

Rice University Committee on Computers, Member, 1988-1992, 1995-1996; Chair, 1996-1998, Co-chair, 1999.

Acting Chairman, Rice Institute for Policy Analysis, 1991-1992.

Divisional Member of the John W. Gardner Dissertation Award Selection Committee, 1998

Social Science Representative to the Educational Sub-committee of the Computer Planning Committee, 1989-1990.

Director of Graduate Admissions, Department of Political Science, Rice University, 1986-1988.

Co-director, Mellon Workshop: Southern Politics, May, 1988.

Guest Lecturer, Mellon Workshop: The U.S. Congress in Historical Perspective, May, 1987 and 1988.

Faculty Associate, Hanszen College, Rice University, 1987-1990.

Director, Political Data Analysis Center, University of Georgia, 1982-1985.

External Consulting:

Expert Witness, Soto Palmer v. Hobbs, (Washington State), racially polarized voting analysis, 2022.

Expert Witness, Pendergrass v. Raffensperger, (Georgia State House and Senate), racially polarized voting analysis, 2022.

Expert Witness, LULAC, et al. v. Abbott, et al., Voto Latino, et al. v. Scott, et al., Mexican American Legislative Caucus, et al. v. Texas, et al., Texas NAACP v. Abbott, et al., Fair Maps Texas, et al. v. Abbott, et al., US v. Texas, et al. (consolidated cases) challenges to Texas Congressional, State Senate, State House, and State Board of Education districting, 2022.

Expert Witness, Robinson/Galmon v. Ardoyn, (Louisiana), racially polarized voting analysis, 2022.

Expert Witness, Christian Ministerial Alliance et al v. Arkansas, racially polarized voting analysis, 2022.

Expert Witness, Johnson v. Wisconsin Elections Commission, 2022.

Expert Witness, Rivera, et al. v. Schwab, Alonzo, et al. v. Schwab, Frick, et al. v. Schwab, (consolidated cases) challenge to Kansas congressional map, 2022.

Expert Witness, Grant v. Raffensperger, challenge to Georgia congressional map, 2022

Expert Witness, Brooks et al. v. Abbot, challenge to State Senate District 10, 2022.

Expert Witness, Elizondo v. Spring Branch ISD, 2022.

Expert Witness, Portugal v. Franklin County, et al., challenge to Franklin County, Washington at large County Commissioner's election system, 2022.

Consulting Expert, Gressman Math/Science Petitioners, Pennsylvania Congressional redistricting, 2022.

Consultant, Houston Community College – evaluation of election impact for redrawing of college board election districts, 2022.

Consultant, Lone Star College – evaluation of election impact for redrawing of college board election districts, 2022.

Consultant, Killeen ISD – evaluation of election impact for redrawing of school board election districts, 2022.

Consultant, Houston ISD – evaluation of election impact for redrawing of school board election districts, 2022.

Consultant, Brazosport ISD – evaluation of election impact for redrawing of school board election districts, 2022.

Consultant, Dallas ISD – evaluation of election impact for redrawing of school board election districts, 2022.

Consultant, Lancaster ISD – redrawing of all school board member election districts including demographic analysis and redrawing of election districts, 2021.

Consultant, City of Baytown – redrawing of all city council member election districts including demographic analysis and redrawing of election districts, 2021.

Consultant, Goose Creek ISD – redrawing of all board member election districts including demographic analysis and redrawing of election districts, 2021.

Expert Witness, Bruni et al. v. State of Texas, straight ticket voting analysis, 2020.

Consulting Expert, Sarasota County, VRA challenge to district map, 2020.

Expert Witness, Kumar v. Frisco ISD, TX, racially polarized voting analysis, 2019.

Expert Witness, Vaughan v. Lewisville ISD, TX, racially polarized voting analysis, 2019.

Expert Witness, Johnson v. Ardoyn, (Louisiana), racially polarized voting analysis, 2019.

Expert Witness, Flores et al. v. Town of Islip, NY, racially polarized voting analysis, 2018.

Expert Witness, Tyson v. Richardson ISD, racially polarized voting analysis, 2018.

Expert Witness, Dwight v. State of Georgia, racially polarized voting analysis, 2018.

Expert Witness, NAACP v. East Ramapo Central School District, racially polarized voting analysis, 2018.

Expert Witness, Georgia NAACP v. State of Georgia, racially polarized voting analysis, 2018.

EXHIBIT 7

Grant, Annie Lois, et al.v. Raffensperger, Brad, E

Page 1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ANNIE LOIS-GRANT et al.,)
)
Plaintiffs,)
)
vs.) CIVIL ACTION FILE
) NO. 1:22-CV-00122-SCJ
BRAD RAFFENSPERGER, in his)
)
official capacity as the)
Georgia Secretary of State,)
et al.,)
)
Defendants.)
_____)

Deposition of Blakeman Esselstyn
(Signature is reserved.)
February 16, 2023
9:00 a.m.

Remote via Zoom technology

Reported by: Carla J. Hopson, RPR, CCR-1816

1 drawing a plan, right?

2 A I would say at some level, yes.

3 Q When you're drawing redistricting plans
4 for jurisdictions like the 16 North Carolina
5 earlier, do you use the features of the software
6 that you referenced to display racial information
7 while you're drawing those maps.

8 A I'm literally thinking back to my
9 process. Not certainly. Not always. I can think
10 of some where I did not or at least -- yeah, at
11 least one where I didn't. The -- and there's sort
12 of a distinction that -- in the software I was
13 using.

14 The columns you specify at the beginning
15 of the process are going to be the columns that get
16 exported when you provide a table -- a summary table
17 of the demographics.

18 So -- but I -- I am quite certain that
19 there are multiple cases where I was not looking at
20 race when I was drawing the redistricting plans.

21 Q And when you were drawing the
22 illustrative plans in this case, at any point did
23 you display racial information of the underlying
24 geography on your screen?

25 A Yes.

1 Q And what kind of racial information
2 would you display while you were drawing the
3 illustrative plans?

4 A For the underlying geography, I would --
5 it would be the black percentage of the population
6 meaning the -- any part black voting age percent.

7 Q And did you use a theme or a shading of
8 precincts or counties to look at that any part black
9 population while you were drawing?

10 A I think so. I think that I -- I think
11 that I may have. I'm not a hundred percent sure,
12 but I think that I may have, yes.

13 Q And did you utilize that display of
14 racial information about the underlying geography
15 while you were drawing the illustrative plans for
16 House and Senate?

17 A The shading?

18 Q Yes.

19 A I'm not totally sure.

20 Q Did you utilize any of the racial
21 information that you displayed on the screen while
22 you were drawing the illustrative plans to inform
23 the decisions you made about which parts of
24 districts went in and out of a particular districts?

25 A Yes.

1 generally shifted District 25 to the north and west
2 into areas including those that had been occupied by
3 Senate District 17.

4 And so it's kind of swapping areas that
5 had been in Senate District 25 in the enacted map
6 into illustrative District 17, and in doing so
7 making Senate District 25 significantly more
8 compact.

9 So that was a kind of a long answer to
10 the question of why. And always -- I'm getting into
11 the broken record here, but doing this while
12 considering other traditional redistricting
13 criteria.

14 Q And in talking about considering other
15 traditional redistricting criteria, looking at
16 Senate 17 on the illustrative plan, it looks to me
17 like it has four split counties in it: Greene,
18 Baldwin, Newton and Walton Counties.

19 How did you take into account the
20 traditional principle of avoiding county splits in
21 the creation of Senate District 17?

22 A I considered it in balance with the
23 other principles, and weighing the other
24 considerations and factors that I was trying to
25 adhere to, I ended up with that number of county

1 splits in that district.

2 I'm just going to see if Figure 3 -- it
3 looks like previous incarnation of District 17 might
4 have had three splits. It's a little hard to say
5 from Figure 3. I'm going to zoom in.

6 Q My count was that Senate 17 on the
7 enacted had three county splits and Senate 25 on the
8 enacted had two county splits.

9 A Okay. So that might have been part of
10 my consideration as well just its predecessor ha
11 three county splits.

12 Q And so adding a county split you felt
13 was still complying with the traditional principle
14 of avoiding jurisdiction splits?

15 A Taken in conjunction with all the other
16 considerations, yes.

17 Q On Figure 4 -- this is going to be a
18 little bit harder to see. Because I don't think
19 it's another map that really shows it. But District
20 20 on the illustrative plan begins, I believe, in
21 Jenkins County just south of Senate District 23 and
22 runs all the way past Macon. And I believe that's
23 into Dooley County.

24 Can you explain what community of
25 interest explains the configuration of Senate

1 District 20 on the illustrative plan?

2 A Let me take a moment. To answer your
3 question, I don't think it's possible to say that
4 there is a community of interest that explains the
5 configuration of District 20, not one -- one
6 community of interest.

7 Q Then can you walk me through then
8 what -- what does explain the boundaries of Senate
9 District 20 as you've drawn in on the illustrative
10 plan?

11 A So, again, I can refer back to Figure 3
12 showing the enacted plan, and you can sort of
13 see how District 20 looks in the enacted plan. I
14 think it's also instructive to look at 26 in the
15 enacted plan and then compare that in Figure 3 with
16 Figure 4 and see how much smaller District 26
17 becomes.

18 So 26 goes from spanning pieces of,
19 what? Seven counties, I think, to being just in two
20 counties. So that -- and I know you can't see in
21 Figure 4, but I'm pretty sure that Senate District
22 26 is just in Macon-Bibb and Houston Counties.

23 So in making District 26, the
24 configuration that it has, and removing the splits
25 from Bibb County, which as I recall was split three

1 ways, there's kind of a void that needs to be filled
2 and expanding the area of District 20 in that
3 direction, I guess to the north, was -- that's part
4 of why it was done the way it was as well as changes
5 to District 23.

6 I'm just looking back and forth. But,
7 yeah. So it was kind of a way of trying to
8 harmonize the shape of District 20 as it was
9 adjacent to Senate District 26 and Senate District
10 23.

11 Q Do you recall, did you draw Senate
12 Districts 23 and 26 first and then fill in around
13 them with 17 and 20?

14 A That's an interesting question, Mr.
15 Tyson. You don't really draw the districts one at a
16 time. Well, you can. But the way that I typically
17 work in the software is to take census geography and
18 assign it -- change its assignment from being in one
19 to being in another.

20 So if I'm changing the southern edge of
21 Senate District 23, I'm going to either assign --
22 and depending on whether I'm removing areas or
23 adding areas, the adjacent district is going to get
24 those -- the areas that were removed, for example.

25 So in essence when I'm drawing Senate

1 A Good question. I would -- I guess in
2 this -- I did use the word community. Maybe
3 population would have been a better choice of words
4 because some folks would -- would characterize
5 racial groups as a community of interest. And so I
6 think some people would say that that is -- that
7 they, as you described, could be considered one
8 community.

9 Often as I'm drawing a map I guess I can
10 think of them both as a community with a shared
11 interest or a shared characteristic I should say.
12 But also they are -- they have their distinctive
13 elements as well.

14 Q In the configuration of districts 23,
15 the counties that you split kind of starting in the
16 north, then going around are Wilkes, Greene,
17 Baldwin, Richmond and McDuffie Counties, right?

18 A Yes.

19 Q And are you aware that for each of those
20 county splits you included the highest concentration
21 of black voters in the county Senate District 23 and
22 the more white population portion of the county
23 outside of District 23?

24 A I am not aware that that's the case.

25 Q Okay. Let me mark --

1 A And, yeah, if you can just be able to
2 refer back to that wording as we -- as we go to
3 another exhibit because, again, I just wanted to
4 make sure I understand the just kind of mathematical
5 relationship you're describing.

6 Q Certainly. We're going to look at a
7 chart.

8 A Okay.

9 Q I just introduced Exhibit Number 9,
10 which is Mr. Morgan's report in this case.

11 A Yep.

12 Q And I'd like for us to go to Page number
13 17. Let me know when you're there.

14 A 17, yes.

15 Q And I believe you said you reviewed Mr.
16 Morgan's report as part of your preparation for this
17 deposition.

18 A Yes.

19 Q So on page 17 there's a chart for --
20 that has each of the five-county split with a
21 portion in District 23 and outside of District 23.
22 Do you see that?

23 A Yes.

24 Q And in each case the portion of the
25 county in District Senate 23 has a higher AP Black

1 VAP percentage in the portion outside of Senate
2 District 23 on the illustrative plan, right?

3 A Yes.

4 Q And were you aware that -- I think you
5 said you weren't -- that every county split you made
6 in Senate District 23 had this type of racial
7 differentiation on the population?

8 A Okay. I misunderstood your question. I
9 thought you were talking about the -- you said
10 something about the highest concentration, and I
11 thought you were saying that I had somehow selected
12 the highest concentration possible in isolating one
13 section of a county from the other section.

14 You used that superlative term highest,
15 and I thought you were saying that I had taken --
16 like if I was taking precincts, that there's no
17 other combination of precincts that I could have
18 taken that would have been higher than what I took.

19 So that's what I understood. And that's
20 why I wanted to maybe refer back to the way you had
21 asked the question.

22 So, yes, I have looked at this chart.
23 There is something that I don't agree with in terms
24 of Mr. Morgan's characterization here. In the
25 preceding paragraph he says that I took the lion's

1 share or the construction takes the lion's share --
2 I'm paraphrasing a little bit -- of the black
3 population of each of those counties into the
4 district.

5 But in Greene County the black
6 population outside District 23 is actually more
7 numerous, and in the case of the AP Black voting age
8 population, the fourth column of numbers, it's --
9 well, both, really. Both of the black population
10 columns of numbers show that there's significantly
11 more black people outside District 23 than inside.

12 Q And just to be clear, you're looking at
13 the raw number of individuals, not the percentage of
14 those individuals as compared to the remaining
15 population, is that right?

16 A Right. My under -- yes.

17 Q Have you evaluated whether Senate
18 District 23 would still be majority black if you
19 removed any of these county splits?

20 MR. HAWLEY: Objection to the extent
21 that, Mr. Esselstyn, your answer implicates
22 draft maps or draft reports. But otherwise,
23 you can answer.

24 A I don't recall doing so.

25 Q Okay. I'll put this one away and go

1 deviation number in your written report, just in the
2 exhibits, right?

3 A That's right.

4 Q Is the way that you determined that the
5 illustrative plan complied with the traditional
6 principle of population equality for the House the
7 same as the methods you used for making that
8 determination for the Senate illustrative plan?

9 A I think generally, yes.

10 Q In paragraph 57 you talk about
11 compactness. And we, again, have the average scores
12 for four of the five metrics and then a cut edge
13 score. Would you expect average compaction scores
14 to be the same if 155 of the 180 districts on a plan
15 are the same?

16 A No. I mean, it could be. But --

17 Q Okay.

18 A -- that's saying that --

19 Q Okay. So you didn't break out the
20 compactness scores for the 25 districts that you
21 changed. You only reported here in Table 6 the
22 average for all 180 districts for four of those five
23 measures, and then over on Table 7 the scores for
24 just the new majority black districts, right?

25 A That's right. In the text of the

1 report. But the -- the attachments include
2 compactness scores for all the districts in both
3 enacted and illustrative as well as other summary
4 and metrics.

5 Q And was your method of determining that
6 the plan complied with the traditional principle of
7 compactness generally the same process for the House
8 illustrative plan as for the Senate Illustrative
9 plan?

10 A Yes.

11 Q And for Figure 17, like the Senate,
12 these charts -- the only districts on these four
13 charts that are from the illustrative plan are the
14 colored lines. And the gray lines are districts on
15 the enacted plan, right?

16 A That's right.

17 I'm sorry. If you -- if you wouldn't
18 mind repeating that question again. I just tuned
19 out for a moment.

20 Q Sure. In Figure 17, the --

21 A Yes.

22 Q -- in all four charts the only districts
23 from the illustrative plan on those charts are the
24 colored lines. The gray lines refer or are
25 districts on the enacted plan, right?

1 A That's correct.

2 Q Do you recall that Mr. Tyson asked you
3 about the Maptitude software's ability to shade
4 racial demographic information while you're
5 undertaking map drawing?

6 A I do.

7 Q And you mentioned that you have used
8 that shading, including in the development of your
9 illustrative plans, correct?

10 A Correct.

11 Q My question is: Do you always have that
12 shading function on when you're map drawing?

13 A No.

14 Q Did you always have that shading
15 function toggled on when you were drawing your
16 illustrative Senate and House maps in this case?

17 A No.

18 Q Does Maptitude provide other means of
19 assessing racial and other demographic information
20 other than shading?

21 A Yes.

22 Q Did you use that shading function to
23 make any outcome determinative line drawing
24 decisions? Let me phrase that a different way.

25 A Okay.

1 Q When you -- when you had that shading
2 function toggled and you could see it, did you use
3 the information that that shading provided -- did
4 that information predominate in any given line
5 drawing decision you made when you were preparing
6 you illustrative maps?

7 A No, it did not.

8 Q I'd like to talk briefly now about some
9 of the comparative characteristics, particularly
10 kind of the more general discussion that you had
11 with Mr. Tyson earlier in the deposition. And
12 again, just so it's clear in the record, is it fair
13 to say that some of the traditional redistricting
14 principles that you drew in accordance with and
15 analyzed in your report can be understood in
16 isolation for a single map?

17 A I'm sorry. Could you repeat the
18 question?

19 Q Certainly. Are there certain
20 redistricting criteria that can be analyzed -- the
21 compliance with which can be analyzed simply by
22 looking at a single piece of information from a
23 given map?

24 A Oh, yes. Yeah, for like contiguity.
25 And, again, it's helpful to use the Maptitude

1 A No.

2 Q Were you ever instructed to maximize the
3 number of majority black districts in either the
4 State Senate or House map?

5 A I was not.

6 Q And is it your opinion that you
7 illustrative maps that you have submitted along with
8 your December 5th report are complete and finalized
9 enough that they could be adopted and implemented by
10 the State of Georgia in future elections?

11 A Yes.

12 MR. HAWLEY: All right. Thank you, Mr.
13 Esselstyn. That's all I have, Mr. Tyson,
14 unless you have anything.

15 Yes? It looks like a yes.

16 MR. TYSON: Just a few more, Mr.
17 Esselstyn.

18 FURTHER EXAMINATION

19 Q (By Mr. Tyson) Mr. Hawley was asking you
20 about shading information on racial data and various
21 questions on that. Do you recall those questions?

22 A I do.

23 Q And just to confirm, you only had census
24 data, not any political data available to you when
25 you were drawing your illustrative plans, right?

EXHIBIT 8

Grant, Annie Lois, et al.v. Raffensperger, Brad, E

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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 ANNIE LOIS GRANT, et al.,

5 Plaintiffs,

6 v.

CIVIL ACTION FILE
NO. 1:22-CV-00122-SCJ

7 BRAD RAFFENSPERGER, in his
8 official capacity as the
9 Georgia Secretary of
10 State, et al.,

11 Defendants.

12 COAKLEY PENDERGRASS, et al.,

13 Plaintiffs,

14 v.

CIVIL ACTION FILE
NO. 1:21-CV-05339-SCJ

15 BRAD RAFFENSPERGER, et al.,
16 Defendants.

17 VIDEOTAPED ZOOM DEPOSITION OF
18 MAXWELL PALMER, Ph.D.

19 February 22, 2023

20 9:28 A.M.

21 Lee Ann Barnes, CCR-1852B, RPR, CRR, CRC
22
23
24
25

1 A. I'm not if he was using the same data that
2 was available to him. He might just be using the
3 results of my report and not looking at the data
4 itself.

5 COURT REPORTER: Excuse me. Could you
6 repeat the objection, please? It was spoken
7 over.

8 MR. JACOUTOT: It was just object to form.

9 COURT REPORTER: Thank you.

10 BY MR. HAWLEY:

11 Q. With that data and with the methodology
12 that you applied to reach your results, Dr. Palmer,
13 is it possible for Dr. Alford to make a subjective
14 determination as to causation, which is to say, why
15 voters voted the way they did?

16 MR. JACOUTOT: Object to form.

17 THE WITNESS: I -- I don't believe so.

18 MR. HAWLEY: Okay. That's all I have.

19 MR. JACOUTOT: Okay. And I don't have any
20 follow-up, so I think we can call it a day.

21 VIDEOGRAPHER: All right. The time on the
22 monitor is 11:51 a.m. We're going off the
23 record.

24 (Deposition concluded at 11:51 a.m.)

25 (Pursuant to Rule 30(e) of the Federal

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Coakley Pendergrass, et. al., v. Brad Raffensperger, et. al.

John B. Morgan

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

-----x
COAKLEY PENDERGRASS, et al., :
: :
Plaintiffs, : Civil Action
vs. : File No.
: :
BRAD RAFFENSPERGER, in his : 1:21-cv-05339-SCJ
official capacity as the :
Georgia Secretary of State, :
et al., :
Defendants. :
-----x

ANNIE LOIS GRANT, et al., :
: :
Plaintiffs, : Civil Action
vs. : File No.
: :
BRAD RAFFENSPERGER, in his : 1:22-cv-00122-SCJ
official capacity as the :
Georgia Secretary of State, :
et al., :
Defendants. :
-----X

VIRTUAL REMOTE VIDEOTAPED DEPOSITION OF
JOHN B. MORGAN
Monday, February 13, 2023
10:34 a.m. Eastern Standard Time

REPORTER: Dawn A. Jaques, CSR, CLR

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

2/13/2023

Coakley Pendergrass, et. al., v. Brad Raffensperger, et. al.

John B. Morgan

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1 probably pretty close.

2 Q All right.

3 A Again, I would like to have the data
4 to reference it. I know I do have access to
5 that data.

6 Q All right, if we can turn to Chart 3
7 on the next page, on page 8 of your Grant
8 report, and here you provide top-line
9 summaries of Mr. Esselstyn's Senate Plan
10 versus the Enacted Senate Plan; is that right?

11 A Yes.

12 Q Would you agree that the two plans
13 have similar mean compactness scores on both
14 the Reock and Polsby-Popper metric?

15 A Yeah, I discuss that in paragraph 22
16 that the compactness scores are close to, but
17 slightly lower, than the Enacted Senate Plan.

18 Q And in the context of the
19 Congressional Plan, you referred to that .01
20 difference in mean compactness scores as
21 similar, correct?

22 A In that context, I did.

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1 Q So Chart 8 provides the overall
2 metrics of Mr. Esselstyn's Illustrative
3 House Plan and the Enacted House Plan; is that
4 right?

5 A Yes.

6 Q You say in paragraph 50 that the
7 overall compactness scores between the two
8 maps are similar; is that right?

9 A Yes.

10 Q And, in fact, they're identical?

11 A To two decimal places, yes.

12 Q Were the number of paired incumbents
13 here, am I right that you again used the
14 incumbent information that you had as of 2021?

15 A Yes. I used the database that was
16 available to the legislature during the
17 redistricting process.

18 Q So you did not analyze the incumbent
19 pairings of current incumbents in the Georgia
20 statehouse?

21 A I don't know that any would be
22 paired of current members because there would

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Dr. John Alford

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

COAKLEY PENDERGRASS, et al.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, in his
official capacity as the
Georgia Secretary of State,
et al.,

Defendants.

Civil Action No.

2:21-CV-05449-SCJ

ANNIE LOIS GRANT, et al.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, in his
official capacity as the
Georgia Secretary of State,
et al.,

Defendants.

Civil Action No.

1:22-CV-00122-SCJ

Videotaped deposition of DR. JOHN ALFORD, taken
remotely in the above-captioned cause, before
Rachel F. Gard, CSR, RPR, CRR, commencing at
the hour of 11:00 a.m. Eastern on Thursday,
February 23, 2023.

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

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Dr. John Alford

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1 in areas of inquiry you looked at, do you examine
2 the reasons for voters' political affiliations?

3 A Yes.

4 Q Have you ever examined political
5 affiliations in the context of race?

6 A So I want to be a little bit careful
7 because when you say "reasons," are you talking
8 about causation or correlation. So certainly we
9 talk a lot about the kind of demographics that are
10 associated with voting or not voting, demographics
11 that are associated with, you know, voting for
12 particular parties. So yes, in that sense. In
13 the sense of sort of probing the causal
14 connections, probably less so.

15 Q Okay. Have you done any work exploring
16 the causal links, whatever they might be, between
17 race and political affiliation?

18 A Not specifically that I can think of.

19 Q Okay. Turning back to your report and
20 your qualification section in particular, you
21 mentioned specifically the work that you have done
22 on behalf of the state of Texas and state

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Dr. John Alford

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1 cases relating to mapping or Gingles 1, correct?

2 A Correct.

3 Q Have you reviewed the expert reports
4 prepared by Dr. Vernon Burton in these cases?

5 A I may have. I don't have any specific
6 recollection of it. Is this -- if it's on sort of
7 the topic is either Gingles 1 or sort of the
8 details of totality of the circumstances beyond
9 polarization, if I opened it up and saw that's
10 what it was, I probably would have closed it right
11 away.

12 Q Sure. Sure.

13 A It's not something I focus on or have any
14 recollection of.

15 Q Okay. I was going to ask as well about
16 Dr. Loren Collingwood. But I think the simplest
17 way of addressing this is to ask, do you offer any
18 opinions on the Senate 2 -- sorry, on the
19 Section 2 Senate factors, other than racially
20 polarized voting?

21 A I don't believe so, no.

22 Q Okay. And, therefore, in the context of

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1 research task.

2 But in terms of dealing with providing
3 information from elections using precinct-level
4 data, this is clearly the right method. And
5 Dr. Palmer, I will say, had various -- in other
6 cases and in this case, reviewed both how he does
7 it and what were the results that he gets. I
8 think he's one of the experts I'd say is clearly
9 using the right technique and using it correctly.

10 Q And those conclusions extend to his work
11 in this case; yes?

12 A Yes.

13 Q Do you agree with Dr. Palmer's conclusion
14 that black Georgians are politically cohesive?

15 A Yes.

16 Q Do you agree that in the areas of Georgia
17 Dr. Palmer examined, white Georgia voters vote as
18 a bloc usually to defeat black preferred
19 candidates?

20 A There are a lot of areas in these reports.
21 And I know so the black cohesion doesn't vary very
22 much across the areas. It's always there. It's

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1 always present. But there are some subareas, and
2 I don't honestly recall if it's Dr. Palmer's
3 report or maybe in one of the areas of
4 Dr. Handley's report.

5 But if you get to a small enough area, you
6 get to an area where white voters are also voting,
7 not as cohesively, but also voting a majority
8 Democratic. So there are areas in Georgia where
9 the white vote is not cohesively to the preference
10 of black voters. But by and large across, these
11 areas, white voters are voting either cohesively
12 or at least in the majority for Republican
13 candidates.

14 Q Okay. Perhaps to put it more in the
15 parlance of Section 2, do you disagree with
16 Dr. Palmer's conclusions related to the third
17 Gingles precondition in this case?

18 A Yes.

19 MR. JACOUTOT: Object to form.

20 Q I'm sorry. So you do dispute his
21 conclusion that white voters generally vote as a
22 bloc to defeat black preferred candidates?

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1 A Well, so I just want to be precise about
2 what it is I agree and disagree with.

3 Q Absolutely.

4 A I don't disagree with his conclusion that
5 white voters are generally voting in a different
6 direction, excuse me, than black voters. In
7 particular contexts, obviously, that could
8 potentially act to bloc minority vote. But,
9 again, I'm not sure I agree. I think he -- his
10 view is that's really all he's trying to
11 establish, although he concludes something a
12 little broader than that. So I don't agree with
13 the broader conclusion.

14 And I'd say I'm agnostic about whether
15 that is or is not important at the 2 and 3 stage.
16 So certainly we don't agree about the totality of
17 the circumstances part. And I'm pretty agnostic
18 about whether -- what you're summarizing is kind
19 of a Gingles 2 and 3 as independent of racially
20 polarized voting.

21 Q Right.

22 A I'm not sure. The Court sometimes acts as

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1 Dr. Alford, second paragraph on page 3, and this
2 just a brief quotation, you wrote the quote: As
3 evident in Dr. Palmer's tables 1 through 6 in his
4 Pendergrass report and tables 2 through 6 in his
5 Grant report, the pattern of polarization is quite
6 striking. That's correct?

7 A Yes.

8 Q And that pattern of polarization you
9 referred to is the pattern observed between black
10 voters and white voters, correct?

11 A Correct.

12 Q And your basis for this agreement is that
13 black voters and white votes overwhelmingly
14 support different candidates in elections
15 Dr. Palmer looked at, correct?

16 A That's correct.

17 Q And this pattern can be seen in each one
18 of those elections regardless of the office, the
19 particular office at issue, correct?

20 A That's correct.

21 Q So is it fair to say that you have no
22 disagreement with Dr. Palmer about the voting

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Dr. John Alford

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1 patterns of the two, these two racial groups in
2 Georgia?

3 A So gain, he's confining his analysis to
4 general elections. And in general elections, I
5 don't have any disagreement with Dr. Palmer's
6 finding or his characterization. Specifically of
7 those findings, I think maybe he didn't even
8 characterize them as strongly as I'm
9 characterizing them and reflecting on his results.
10 This is clearly polarized voting, and the
11 stability of it across time and across office and
12 across geography is really pretty remarkable.

13 Q Okay. So now let's kind of drill down to
14 the disagreement that you alluded to earlier. Is
15 it fair to say, do you think, that your
16 disagreement with Dr. Palmer is on the legal
17 significance of these underlying facts and whether
18 they amount to racially polarized voting?

19 MR. JACOUTOT: Object to form.

20 A My own view is it's more fundamental than
21 that, although in the end it becomes a part of the
22 evidence base from what will be a legal finding.

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1 government except making sure everybody is
2 carrying a pistol.

3 But certainly for any court, as it was for
4 the court that Brennan was working with, you can't
5 approach an issue like the legitimacy of an
6 application of the Voting Rights Act, if you're
7 going to blind yourself to evidence presented by
8 the plaintiffs as convincing, solid evidence that
9 their expert backs that shows that the racial cue
10 in the election makes no difference at all to the
11 behavior, voting behavior of blacks or whites.

12 Q So we've been going for about 90 minutes
13 now. It might be -- we might be approaching a
14 good time to take a break. But before we do, I
15 just want to have a couple follow-up questions to
16 what we've been talking about.

17 The first one is: Just when -- and we'll
18 get into this more a little later on. But you
19 just suggested that the analysis that you're
20 purporting to undertake doesn't have a causation
21 element. But when you say that these results
22 demonstrate that the polarization is on account as

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1 party affiliation, how can that be construed as
2 anything but a causal conclusion? Isn't that by
3 necessity what "on account of" means? You're
4 looking for a factor that explains the reasons for
5 something, not merely observing what the data --
6 not merely, not merely seeing what the data on its
7 face demonstrates, I guess that's my question.

8 A That's a good question. I think so the
9 issue that you're going to get at is sort of, is
10 this -- when we look at the data, we can clearly
11 see that these groups vote difference in a party
12 sense, blacks are voting for the Democrat
13 overwhelmingly, whites are voting for the
14 Republican overwhelmingly. So that appears to
15 demonstrate the party of the candidate appears to
16 be having an effect, right.

17 That's compatible with a whole lot of
18 arguments about partisan causation, okay. It is
19 not evidence of causation. It's evidence that it
20 might be fruitful and certainly suggests that
21 there may be some connection. It's an awfully
22 strong pattern, durable across -- up and down the

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1 ballot and across the country, it's an awfully
2 durable element if it doesn't have some causal
3 connection. But in and of itself, right, it just
4 ultimately is a correlation. It is not a causal
5 inquiry.

6 So it is definitely evidence of a clear
7 partisan voting pattern, right. There's a clear
8 connection between the party label and the
9 candidate and the behavior of the voters. But
10 whether that connection is causal or not is a
11 different kind of inquiry. EI is never going to
12 answer a causation question. It can barely answer
13 a correlated question, unless the evidence is
14 really as clear as it is here, right.

15 So the question -- the answer is that is
16 the evidence here is clearly compatible with any
17 number of arguments in which partisanship might be
18 causal. That's not the case, right. So, for
19 example, what we saw here was that the party of
20 the candidate didn't make any difference to this
21 pattern at all. So all I'm asking to be
22 recognized here is if a pattern shows no

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1 established causation or not. All you've
2 established there is that you don't want to
3 discuss causation.

4 Q But as you just noted -- we'll get into
5 this as well. Causation with the data we have in
6 front of us is difficult to ascertain, correct?

7 A So we're moving into the area that's more
8 about kind of philosophy of science than it is
9 about redistricting, okay. So causation is a big
10 topic in political science now. Causation is a
11 big topic in the sciences in general. To the
12 degree we see ourselves as a science, we're a
13 lot -- we're now very actively involved in trying
14 to transform ourselves from an associational
15 discipline into a causal discipline, which means
16 we do a lot of experimental work. We have a lot
17 of quasiexperimental work. We have really
18 fancy -- we now have two separate individuals in
19 our department that just teach causal methodology.
20 I can promise you, it looks nothing like this at
21 all.

22 Establishing causation is a very difficult

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1 scientific issue, and it's really kind of
2 fundamental. It's being thrown around here in the
3 common sense term of causation. It's not the
4 scientific sense of causation. So I don't think
5 anything -- when people say, well, isn't "on
6 account of race" the same thing as establishing
7 causation? In a colloquial sense, maybe. Even in
8 a legal sense, probably. In a scientific sense,
9 no.

10 Q Okay.

11 A In a scientific sense, I've never seen any
12 work done in terms of the evidence that the Court
13 is looking for or relies on that's come anywhere
14 within a hundred miles of a causal analysis.

15 Q So then you would agree that the data we
16 have, certainly the data we have in front of us in
17 this case, is insufficient to draw conclusions as
18 to causation, certainly in a scientific sense,
19 correct?

20 A But the only thing we can draw from this
21 is the evidence we have is very strong evidence
22 that voters respond differently according to the

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1 A -- is a cue, doesn't mean it's a cue,
2 therefore that creates this causal tumble or
3 whatever. But if the information is available to
4 the voters, therefore it's one of the things they
5 may be acting on because it is apparent to them
6 and it's something they actually know about,
7 people act on things that they don't -- that
8 they're not cognizant of, but certainly the things
9 they are cognizant of can be important.

10 Again, by "racial cue," I mean that
11 information is available to the voters when
12 they're making the decision, and I'm not really
13 going beyond that with the evidence we have here.

14 Q Okay. Would you agree that the race of a
15 candidate is not the only role race plays or race
16 might play in a voter's political behavior?

17 A Yes.

18 Q And, in fact, race might play -- again, we
19 don't -- kind of removing ourselves from the data
20 here and speaking more just abstractly or
21 theoretically, race might play a tremendously
22 important role in a voters' decision or how they

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1 vote or what their political beliefs are. Do you
2 think that's a fair statement?

3 MR. JACOUTOT: Object to form.

4 A We're saying it might, yes. It might; it
5 might not. I think yeah, there's certainly room
6 for race to be involved in decision-making in a
7 wide variety of ways.

8 Q And what -- and now looking at the data we
9 have in front of us, we know how -- to put it
10 plainly, we know how black voters vote in Georgia
11 and we know how white voters vote in Georgia,
12 correct?

13 A Right, in a limited sense of, you know,
14 our prediction about which candidates they prefer
15 in the general elections, yes.

16 Q But what that data does not necessarily
17 tell us is the degree to which race is influencing
18 those decisions?

19 A So yes, it does. It can answer questions
20 about all or a variety of ways in which
21 speculatively race might influence decision, but I
22 guess the way I would answer that is to say, I

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1 wants to draw some inference that is not suggested
2 by this fact pattern, then it needs to have an
3 empirical basis. It just can't be speculative.
4 This is just -- what's being done here is too
5 important to have it done on the basis of some
6 speculation. It needs to be done on the basis of
7 empirical evidence.

8 Q Well, so that's kind of what I want to ask
9 now is about what we can and can conclude from
10 this data, what we could conclude from this data.
11 So imagine, for example -- and, again, I want to
12 focus on race here because that is -- that's
13 obviously a crucial component of this inquiry.
14 And we will turn to party shortly.

15 But when we're thinking about race, if
16 black voters and white voters were making their
17 decisions on -- were casting their ballots not on
18 the race of the candidates but based on any other
19 metric of race you can imagine, based on political
20 issues involving race, based on their
21 identification by merging ideology with race,
22 however you want to say it, but if voters were

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1 casting their ballots for purely racial reasons,
2 wouldn't that -- wouldn't that conclusion also be
3 compatible with the data that we're looking at
4 here, given the extreme polarization that you've
5 observed?

6 A When you say "compatible," sort of we need
7 to unpack that just a little bit. One is to say,
8 what does this evidence empirically demonstrate
9 cannot be true. And so, right, that's a very --
10 demonstrating what this evidence shows cannot be
11 true is very different than saying this evidence
12 demonstrates that X is true.

13 Q Right.

14 A So does this evidence alone indicate that
15 it is not possible that the partisan behavior is
16 actually being driven by racial considerations
17 while the racial behavior is not being driven by
18 racial consideration, right.

19 Q Yes.

20 A Does this demonstrate that can't be true?
21 The answer is no, it doesn't demonstrate that that
22 can't be true. It also doesn't demonstrate a host

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1 of other possibilities, right.

2 Q Right.

3 A So again, that's a different sort of scope
4 question. The question -- the question is, does
5 it in any way suggest that that might be true or
6 does it give us any sense of how likely that is.
7 And I think common sense, if you're saying
8 something as important in U.S. politics as
9 choosing a party, in choosing candidates based on
10 issues is being driven by race, right, so I'm
11 making my party choice entirely on the basis of
12 race because that's how important race is with me,
13 and then when confronted with a racially contested
14 election, it makes no difference at all.

15 So I just find -- again, this is -- you
16 think of it as sort of obvious. If Republicans
17 choose to be Republicans and it's really all about
18 being white and that being a white party that
19 doesn't support -- that doesn't support blacks,
20 then it's just really hard to get your head around
21 how they nominated Herschel Walker. I mean, it's
22 strategically hard to understand how they got

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1 always seems to be multiples of experts on your
2 side. And they're all really -- I shouldn't say
3 "all." Never should say "all." They're almost
4 all people I respect both intellectually and in
5 terms of the work product they produce. So if
6 this is something that could be done, I mean, I
7 have no doubt that if there's something to be
8 investigated here, Maxwell Palmer is more than
9 capable of doing it. I'll be happy to let you
10 know if I think he did it right or did it wrong if
11 that occurs.

12 Q Fair enough. Just before we turn away
13 from this question, I just want to make sure that
14 I understand completely and that the record is
15 clear. The conclusions that you have drawn in
16 your expert report, as they relate to race
17 specifically, is limited to the conclusion that
18 given the data in front of you, there's no
19 connection between voting behavior and the race of
20 candidates? You are not making any other
21 conclusions about the other ways in which race
22 might be influencing or where there might be

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1 connections between race and voting behavior in
2 other ways; is that correct?

3 A Yes. Again, so I'm commenting on or
4 responding to the empirical evidence provided by
5 Dr. Palmer, and he hasn't provided any empirical
6 evidence on any of those questions so I haven't
7 responded to it. And I'm not speculating about
8 it. I'm fine with just dealing with the facts
9 that are on the ground based on his analysis and
10 his report.

11 Q Okay. Let's turn to a discussion about
12 party now. And again, this is a -- I drafted
13 these questions before our conversation, so this
14 might seem a particularly elementary question.

15 But you criticize Dr. Palmer's report
16 because it does not mention the party of
17 candidates in his discussion of the results of his
18 analysis. That's a source of criticism that
19 Dr. Palmer does not engage with party as an issue
20 in his report. Is that a fair statement?

21 A Yes.

22 Q Okay. And again, just kind of as a reset

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1 things that probably play a role in party
2 identification. We know that parental influence
3 is very powerful in party identification, as it is
4 in religious identification. So yeah, there are
5 other things that play a role, and so there could
6 be -- presumably race could play a role in that as
7 well.

8 Q But you -- maybe perhaps you didn't answer
9 the question quite as phrased this way. As
10 applicable scientist, have you done any analysis
11 into the degree to which race plays that role in
12 shaping political preference?

13 A Nothing I would think of as digging into
14 sort of the -- what we're talking about, you know,
15 can you establish a causal connection or explore
16 the nature of that connection? No, I don't think
17 I have anything, certainly research I've done
18 that, you know, with regard to partisanship or
19 voting behavior that could be related to that.
20 Not that is focused on that topic.

21 Q Okay. Just in your experience as a
22 political scientist, having not perhaps done any

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1 in-depth research or analysis, but do you have any
2 views or thoughts on the role that race plays in
3 driving political preference?

4 A It's one of many forces that can -- I'm
5 not sure what would be my driving political
6 preference. It starts to sound a lot like causing
7 political preference. I'll just say political
8 preferences are -- political identification in the
9 U.S. is a complicated psychological trait, and it
10 could be influenced by a lot of things and by
11 different things at different points in time.

12 But I don't know in terms of the state of
13 Georgia, where Georgia is right now, I don't have
14 any specific sort of research conclusion about
15 what accounts for that.

16 Q Okay. And your report in this case
17 certainly provides no attempt to explain why
18 voters of a given race support certain candidates
19 or certain political parties; is that fair?

20 A Dr. Palmer's analysis provides a clear
21 question, an answer to the question, why they
22 support particular candidates. Why they support

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1 particular parties, no. I mean, there's no
2 evidence here about why people support particular
3 parties. There's certainly evidence that party
4 plays a role -- the party of the candidate plays a
5 role in voters supporting particular candidates
6 because that's what the whole pattern is, but not
7 about -- not knowing why people support particular
8 parties beyond the fact that they do is not
9 anything that's been -- that's either in my
10 analysis or Dr. Palmer's.

11 Q So again, this is -- for clarity,
12 edification, however you want to put it, but I'll
13 phrase my next question this way. But let's start
14 with this animating assumption, which is that --
15 and let's be careful about -- I want to make sure
16 we're using the proper verbiage and so I'm not
17 overstating a conclusion or asking you to
18 overstate a conclusion.

19 But if race can drive party preference and
20 party identification, which I think you agree that
21 race is one of the factors that might be
22 influential in shaping a given voters' party

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1 preference or party identification, and if the
2 pattern that you observe indicates that
3 polarization in Georgia is attributable to party,
4 then it's also true, then, that that polarization
5 might be attributable to race through party. Is
6 that fair?

7 MR. JACOUTOT: Object to form.

8 A So I'll say just to make sure that I'm not
9 quoted out of context.

10 Q Sure.

11 A Not that you would do that but somebody
12 else might. We're just restating what I think we
13 said already, is this a possibility? Yes. Is
14 this something you could do empirical work on and
15 establish? Yes. And again, is there anything in
16 Dr. Palmer's report that in any way establishes
17 that that's true in Georgia empirically? The
18 answer is no.

19 So there's not in evidence here. It's not
20 in his report. And if he puts it in his report,
21 I'd have a chance to respond to it and we can
22 debate, is this real, is it the right evidence, is