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

GEORGIA STATE CONFERENCE OF NAACP, et al.,	)	
Plaintiffs,	)	
vs.	)	CASE NO.
STATE OF GEORGIA, et al.,	)	1:21-CV-5338
Defendants.	)	

VIDEOTAPED DEPOSITION OF DANIEL J. O'CONNOR, III
(Taken by Plaintiffs)
March 17, 2023
9:35 a.m.

Reported by: Debra M. Druzisky, CCR-B-1848

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THE VIDEOGRAPHER: We are on the record March 17th, 2023 at approximately 9:35 a.m. Eastern time. This will be the videotaped deposition of Dan O'Connor. Appearances today will be noted on the transcript.

Would the court reporter please swear in the witness?

DANIEL J. O'CONNOR, III,

having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. ROLLINS-BOYD:

Q. Good morning, Mr. O'Connor. My name is Marlin David Rollins-Boyd. I'm a lawyer with the Lawyers' Committee for Civil Rights in Washington, D.C., and I represent the Georgia NAACP plaintiff group in today's case.

Could you please state your full name for the record, spelling the last?

A. Daniel Joseph O'Connor, III. That's O apostrophe C-O-N-N-O-R.

Q. Mr. O'Connor, what's your address?

A. My home address?

Q. Yes, please.

A. 142 Amherst Place, Atlanta, 30327.
(Whereupon, Ms. Love joined the deposition.)
BY MR. ROLLINS-BOYD:
Q. Thank you.
And where are you currently located, Mr. O'Connor?
A. I live in Atlanta.
Q. For the purposes of today's deposition, what's your current address?
A. Oh. In the Coverdell legislative office building in the reapportionment office, Suite 407.
Q. Thank you.
And are you currently employed?
A. Yes, sir.
Q. Okay. And where are you employed?
A. With the Legislative and Congressional Reapportionment Office for the General Assembly.
Q. What's your job title?
A. Data analyst.
Q. How long have you been in your position?
A. Overall about 15 years.
Q. Now, the next couple of questions are just general questions that get asked in every deposition, so I have to ask them today.

Are you on any medication right now that would prevent you from fully or truthfully testifying in today's deposition?

A. No, sir.

Q. Do you have any medical condition that might keep you from participating fully or truthfully in today's deposition?

A. No, sir.

Q. Okay. Now, Mr. O'Connor, I understand that you've been deposed before.

Is that correct?

A. About five years ago, yes, sir.

Q. All right. So, so given that, I won't go over all of the deposition rules. But because this is virtual, I do want to cover some ground rules for today.

Okay?

A. (Whereupon, there was no audible response by the deponent.)

Q. First, to make it easy on the court reporter, it is important that you and I do not speak over one another. To that end, I'm going to ask that you wait to answer your quest -- answer a question until it's been fully asked. And I likewise am going to wait to ask the next question

until you com -- have completed your answer.
Do you understand that?
A. Understood.
Q. Okay. Because this is virtual and the court reporter's not with us, it's important that you give verbal responses to the questions that I ask. So that means, you know, saying "yes" or "no" or giving, you know, a fuller answer but avoid, you know, gestures or uh-huhs or huh-uhs.
Do you understand that?
A. Right. Uh-huh.
Q. All right. I have a tendency to talk fast, and sometimes I may not be clear. If I ask you a question and it's -- you either don't understand it or I was talking too fast, please let me know. I will then try to either rephrase the question or slow down and ask it so that you can hear me.
All right?
A. Okay.
Q. That said, if I ask a question and you do answer it, it is going to be assumed that you understood the question that I asked.
Right?
A. Okay.

Q. All right. I know that we're going to talk about a lot of different things today, and some of it may go back in time. I'm going to ask that you please answer my questions to the best of your recollection and remember that you are testifying under oath.

Okay?

A. Okay.

Q. All right. I'm going to -- I don't know how long we're going to go today, but I'm going to try to make sure that we take breaks, you know, pretty regularly, every hour or so. If for any reason you need a break before then, let me know, and I will try to accommodate it.

The only time I will not -- or I will say we can't take a break is if there is a question pending and I'm waiting for an answer.

Okay?

A. Right. Uh-huh.

Q. Okay. And also from time to time today your attorney may object, and that's fine. However, once he's done making his objection, I'm going to ask that you please answer my question unless he instructs you specifically not to.

Do you understand that?

A. Understood. Uh-huh.
Q. With that, let's kind of jump in. So you previously said you were deposed before, I think you said about five years ago.
Do you remember exactly when that deposition was?
A. Not exactly, no.
Q. Do you remember what case the deposition was?
A. I don't remember the exact name, but it had to do with some mid-term redistricting in Georgia in the house districts.
Q. All right. If I told you that that deposition occurred in about 2017 or 2018, would that sound about right to you?
A. About right. I just don't remember the exact date.
Q. Perfectly fine.
And were you deposed in connection with your role with the L.C.R.O.?
A. Yes, sir.
Q. Okay. And when I say "L.C.R.O.," you understand I'm talking about the Legislative Congressional Reapportionment Office?
A. Right. Uh-huh.

Q. Great. So I'm going to just say L.C.R.O. for the purpose of the deposition because that's kind of a mouthful.

A. Long, uh-huh.

Q. And outside of that depo -- those -- the depositions in 2017 or 2018, have you ever been deposed outside of those depositions?

A. I haven't, no.

Q. Have you ever testified in court before?

A. Not that I recall, no.

Q. Okay. Have you ever personally been a plaintiff or a defendant in a lawsuit?

A. No, sir.

Q. Okay. Have you ever been a plaintiff or a defendant in a lawsuit in your official capacity at the L.C.R.O.?

A. I'm sorry. Been a plaintiff or def --

Q. Yes. Have you ever been a plaintiff or a defendant in your official capacity as a representative of the L.C.R.O.?

A. No. Huh-uh.

Q. Are you currently represented by counsel?

A. Yes, sir.

Q. And who is your counsel?

A. Patrick Jaugstetter.

Q. Okay. And I want to talk a little bit about your preparation for your deposition today.

What did you do to prepare for today's deposition?

A. Well, we had a meeting in this office about eight or nine days ago.

Q. And who attended that meeting?

A. Just the two of us.

Q. Just you and Mr. Jaugstetter?

A. Right.

Q. Okay. And did you review any documents during the meeting in preparation for your deposition?

A. I think he showed me some documents, some E-mails.

Q. Okay. And did you review any other types of documents? Reports, analysis, data type documents?

A. No, not that I recall. No. Huh-uh.

Q. And did those documents refresh your memory regarding the events relevant for today's deposition?

A. Maybe a little. I didn't look in great detail.

Q. All right. Did you review any documents

independently of your meeting with your counsel?
A. I've looked through some data and maps, things like that.
Q. And did you speak about your deposition with anyone outside of your attorney?
A. The only ones would be in the office just to know I would be in one today, but nobody outside the office.
Q. And did you have -- and when you said you had discussions with people in the office, who specifically did you speak with?
A. Well, I mean, Director Gina Wright, you know, who helped arrange the date of the deposition, and just told our other staff yesterday I would be in a deposition so no one would be using the meeting room.
Q. All right. And so were the purposes of those discussions logistical to set up the deposition or were you discussing data or E-mails or information of that sort?
A. Oh, just letting them know I'd be in the deposition so I wouldn't be available if there were, like, calls today, like, for, you know, legislators calling for things.
Q. And did you have any discussions with

members of the L.C.R.O. about any depositions that they might have given in today's case?

A. I talked to my director yesterday briefly, or asked her just about the length of hers. That was it.

Q. Okay. So only the length, no discussion about topics covered or what she may have said during her deposition?

A. No. Huh-uh.

Q. Okay. And did you bring any documents with you today or have any documents with you right now for your deposition?

A. No. Not in the office, no. Huh-uh.

Q. So taking a step back -- and you know, during the course of this trial [sic], documents were produced from your office.

And my question is, did you assist with identifying documents that were produced in this case?

A. You mean I -- you say identifying documents for --

Q. That were produced.

Did anybody come to you and ask you to help identify documents about the 2021 redistricting process --

A. No.
Q. -- so that you --
A. No. No, sir. Huh-uh.
Q. Did you receive a legal hold notice or a document retention notice in this case instructing you not to delete or destroy or alter documents relevant to the 2021 redistricting process?
A. I think we got one from legislative counsel maybe a year or so ago.
Q. And have you complied with that hold notice?
A. Yeah. Uh-huh.
Q. And you know, when you -- as part of your role at the L.C.R.O., I understand that you have communications with legislators and others in the process of your work; is that right?
A. That's correct. Uh-huh.
Q. And when you're having -- when you dis -- when you are performing your duties at work and communicating with others, how are you communicating? Is it via E-mail?
A. Sometimes it's E-mail, and other times it may be on the phone or in person.
Q. Ever through text message?
A. Not usually, no. Huh-uh.

Q. What did -- so you said not usually. Does that mean there may be instances where it has occurred in text message?

A. Could have been a few. I mean, nothing recent.

Q. Okay. And what about instant messenging platforms like WhatsApp or Microsoft Teams or other chat features like that?

A. No. Huh-uh.

Q. All right. Shifting gears a little bit, are you familiar with the term "B.V.A.P."?

A. Yes, sir.

Q. And what is B.V.A.P.?

A. It's the black voting age population.

Q. And are you familiar with the term "H.V.A.P."?

A. Hispanic voting age population.

Q. Okay. So you are familiar with it?

A. Yes, sir. Uh-huh.

Q. Thank you.

And what about "A.A.P.I. V.A.P."?

A. I think that's Asian-American voting age population.

Q. And so, again, you are familiar with it?

A. I've heard the term, yes, sir. Uh-huh.

Q. All right. Are you familiar with the term or the phrase "candidate of choice"?
A. I've heard that mentioned before, yes.
Q. Is --
A. (Inaudible due to cross-talk).
Q. Oh, sorry. Please continue.
A. Yes, sir. I have heard that before. Uh-huh.
Q. And what is your understanding of the term or the meaning of the term "candidate of choice"?
A. My understanding as pertains to the Voting Rights Act is that minority voters, when it comes to candidate of choice, is they're able to choose somebody of their option, get them elected.
Q. That sounds great.
So you would agree that it is, a candidate of choice can mean the preferred candidate of a particular group?
A. Correct. Uh-huh.
Q. Were you generally aware if there's a certain amount or certain percentage of voters of color that would be needed in a particular district in Georgia for that -- those voters to elect their candidate of choice?
A. I'm not sure if there's a specific number,

no.

Q. Not -- okay.

What about B.V.A.P., are you aware of a certain amount of B.V.A.P. that would be needed in a district for black voters to elect their candidate of choice?

A. No, sir.

Q. What about H.V.A.P., are you aware of a particular H.V.A.P. percentage?

A. No.

Q. A black and Hispanic combined voting age percentage?

A. No, sir.

Q. Okay. While -- okay. What about just generally, while you might not know a specific amount, are you generally aware of how much B.V.A.P. would be needed to elect a candidate of choice by black voters?

A. No. I don't think -- I mean, that -- I don't think you can give a specific answer to that, because we've had, you know, African-American candidates elected at different percentages.

Q. Okay. Well, how about this, have you ever looked at the data in Georgia to determine what percentage of voters of color would be needed to

elect a particular candidate of choice?
A. No. Huh-uh.
Q. Never looked at the amount of B.V.A.P. that would be needed to -- for black voters to elect their candidate of choice?
A. No. Huh-uh.
Q. Never looked at the amount of H.V.A.P. that would be needed for Hispanic voters to elect their --
A. No.
Q. -- candidate of choice? Okay.
The same question for combined B.V.A.P. and H.V.A.P.?
A. No. Huh-uh.
Q. Okay. What about generally, have you ever looked generally? So not in -- not asking about a specific district, but have you ever looked generally to determine how much B.V.A.P. would be needed for black voters to elect their candidate of choice?
A. I mean, I've looked at, you know, percentages in the, maybe in -- I've taken a look at house/senate congressional districts different percentages and candidates just in a general sense, but I couldn't give a specific number.

Q. Okay. So when you were looking kind of generally at it, what data were you reviewing to kind of make that determination?

A. Well, looking at the data we have on, you know, we have it on our Web site, the population and demographic data on our congressional house and senate districts.

Q. Would you have also looked at turn-out data by race?

A. I may have at some times. I mean, there's not -- I don't -- I don't think we -- I mean, I'm trying to think if there's anything specific on that. But I mean, I couldn't -- you know, that would be one factor you could look at, too.

Q. So you would have looked at population data, you would have looked at demographic data, maybe turn-out data by --

A. Turn-out data, right. Uh-huh.

Q. Any other data you would have considered in trying to generally determine the amount of B.V.A.P. needed for black voters to elect their candidate of choice?

A. Not that I can think of offhand, no. Huh-uh.

Q. Okay. Have you ever performed or have you

ever looked at data in Georgia to determine how much H.V.A.P. or percentage of H.V.A.P. would be needed for Hispanic voters to elect their candidate of choice, generally?

A. No, I haven't. Huh-uh.

Q. Okay. What about have you looked at the data to determine the combined B.V.A.P. and H.V.A.P. for black and Hispanic voters to elect their candidate of choice generally in Georgia?

A. No, I've never done any analysis of that.

Q. When you did your analysis for black voters in Georgia, did you memorialize that analysis?

A. Mem -- what do you mean by memorial --

Q. Did you write -- prepare a summary of your analysis?

A. No. Huh-uh.

Q. Did you E-mail your analysis to anyone?

A. No.

Q. Did you keep notes about what you found during your analysis?

A. I've had some notes, yeah, looking at the districts, yes. Uh-huh.

Q. Okay. And when you say "looking at the districts," were there specific districts you were

looking at?
A. I looked at a number of districts in the house and senate where African-Americans were elected, uh-huh.
Q. And can you recall any specific districts as you sit here today that you looked at?
A. I looked at some districts in, like, Cobb County, Gwinnett County, maybe, I think, you know, Fulton and DeKalb, just different counties.
Q. And when did you perform this analysis?
A. Oh, I took a look the last couple of days.
Q. Oh, so you've done this recently. Have you --
A. Uh-huh.
Q. -- performed a similar type of analysis in the past in any other time? Did you -- well, strike that.
A. Not that I recall, no. Huh-uh.
Q. So you didn't perform this type of analysis in 2021?
A. No. Huh-uh.
Q. 2020?
A. No. Huh-uh.
Q. No other time you can recall, though, outside of the past couple days?

A. Right.
Q. Okay.
A. Uh-huh.
Q. What was the purpose of you performing this analysis?
A. Well, I was just trying to get familiar with some of the data in case I got questions about, you know, demographics of districts.
Q. And although you performed the analysis in the past couple of days, you were looking at data from when exactly?
A. Well, the 2020 census.
Q. 2020 census data? Okay.
And what did you conclude from your analysis? Were there -- was there a certain amount of B.V.A.P. in the districts you looked at that was necessary for black voters to elect their candidate of choice?
A. Well, no. There was -- there was wide variance across districts.
Q. Okay. Well, let's talk about those issues. I think you said Cobb was one such district?
A. Uh-huh.
Q. What were your findings for Cobb?

A. Well, I looked at, I think it was House District 43 where African-American I think Segun [sic] Adesanya got elected.

Q. Okay.

A. It's a house district in Cobb along I-75, and I think it was maybe 24, 25 percent.

Q. Okay. I think you mentioned you looked at Gwinnett County?

A. Yes. Uh-huh.

Q. What were your findings in -- for Gwinnett?

A. Well, I mean, what I remember was I think Jasmine Clark in House District 108.

Q. Okay. And what were your findings for House District 108?

A. I think hers was maybe 17, 18 percent --

Q. Okay. And what --

A. -- African-American.

Q. All right. And what about Fulton County, I think you said Fulton County was another one you looked at?

A. I looked at, yes, some districts in general, I think, like, Sheila Jones in District 60. And Mesha Mainor I think's District 56.

Q. Okay. One second.

And what were your findings for those districts in Fulton County?

A. Well, I think, and let's say Mainor's district was maybe a mid-40s percent African-American. I think Sheila Jones was closer to 60.

Q. Okay. And were there any other counties you looked at, or districts you looked at?

A. I think I looked at Richmond over in Augusta and then Chatham, which would be Savannah.

Q. Okay. Let's talk about those. Let's start with Richmond. What were your findings for Richmond?

A. I think the districts there were may -- were over, you know, 50 percent African-American. I don't remember exactly what.

Q. And what about Chatham and Savannah?

A. I think we had -- I think there was one that was majority African-American and maybe two that were maybe a plurality.

Q. Okay. And what were your findings in the district that was majority African-American? What were your finding -- what was your finding there?

A. I mean, it was -- that -- I think was Edna Jackson, just that she was elected from a majority

African-American district in Savannah. I don't think there was anything to really add to that.

Q. You didn't -- don't recall the percentage of B.V.A.P. that was --

A. Not the B.V.A.P., no, I -- and I mean, the population, I don't remember the B.V.A.P.

Q. What about for the district you said was a plurality, what are -- what were your findings there?

A. It was maybe 43, 44. I think it was District 162.

Q. And I think you also mentioned you looked at Augusta; is that correct?

A. Correct. Uh-huh.

Q. All right. And what house district or what districts did you look at in Augusta?

A. I think there were four districts. And some of them go out of Richmond County. And I think they were all in the 50 something range.

Q. So they were all in the above 50 something range?

A. Population, not voting -- not black voting age population.

Q. Oh, okay. What do you recall about your findings with respect to black voting age

population?
A. Well, I looked at the population. I didn't look at the black voting age population.
Q. Okay. So you don't have an opinion about how much B.V.A.P. in those districts would have been needed for black voters to elect their candidate of choice?
A. Correct. Uh-huh.
Q. Taking a step back a little bit, you would agree that, in 2014 in Georgia, a district that was over 30 percent black would tend to elect Democrats; correct?
A. Correct. Uh-huh.
Q. Okay. And in your -- what's the basis of your opinion for that?
A. I think it was just past elections in Georgia, I mean, going back to the previous decade.
Q. Okay. And is there -- is there particular data you would have looked at to support that conclusion or to confirm that conclusion?
A. It could have been population data or voter registration data.
Q. All right. Would it have been turn-out data potentially?
A. I don't remember looking at turn-out data.

It could have been.

Q. All right. So, so you said population data, you said --

A. And voter registration.

Q. -- voter registration data. Would it have included demographic data?

A. Well, yes. Under population, yes. Uh-huh.

Q. Any other racial data?

A. No. Huh-uh.

Q. And so you agree that, in 2014, a district over 30 percent would have tended to elect Democrats.

My question is, the data you looked at that would have confirmed that opinion, do -- did you still review that type of data in subsequent years as part of your job?

A. No, I don't think so. Huh-uh.

Q. So I think you said you were looking at race -- turn-out data, population data, voter registration.

You looked at that type of data in 2015 as part of your job; correct?

A. In 2015?

Q. Yes.

A. Yes. Uh-huh.
Q. And you would have looked at that type of data as part of your job in 2016?
A. Well, I don't think we were doing -- I don't remember doing redistricting in 2015 or '16.
Q. Okay. Would you have had access to that type of data in 2016?
A. Oh, sure. Yes. Uh-huh.
Q. And would you have had access to that type of data in 2017?
A. Yes, sir.
Q. 2018?
A. Yes. Uh-huh.
Q. 2019?
A. Yes. Uh-huh.
Q. 2020?
A. Yes.
Q. And 2021 as well?
A. Right. Uh-huh.
Q. And is it -- is it your testimony that you only would have reviewed that type of data in connection with redistricting, you wouldn't have looked at it at any other time as part of your job at the L.C.R.O.?
A. I mean, mainly at redistricting time, yes.

Q. Okay. So your opinion that 30 -- a district in 2014 that was 30 percent black would tend to elect Democrats, that's based on the data you reviewed; correct?

A. Correct. Uh-huh.

Q. And your experience working with the L.C.R.O.?

A. Right. Uh-huh.

Q. Do you have any reason to believe that that 30 percent figure that would have tended to elect Democrats in 2014 was meaningfully different in subsequent years?

A. You mean in the years right after that?

Q. Yes.

A. I don't know.

Q. So, so you have no reason to believe it was meaningfully different in 2015?

A. No. Probably not. Huh-uh.

Q. 2016?

A. No. Huh-uh.

Q. 2017?

A. No.

Q. 2018?

A. No.

Q. 2019?

A. No.
Q. 2020?
A. Huh-uh. No.
Q. 2021?
A. No.
Q. 2022?
A. No. Huh-uh.
Q. What about right now?
A. It's probably not that much different.
Q. Okay. It's true -- isn't it true that in 2015 you performed an analysis -- or scratch that. Strike that.
Have you ever performed an analysis to determine what percentage of voters of color would be needed for voters to elect a candidate from a particular political party?
A. An analysis? No. Huh-uh.
Q. Have you ever prepared or offered an opinion to anyone about the amount of -- or the percentage of voters of color that would be needed to make a district competitive for a particular political party?
A. I mean, it's possible I have. I mean, I don't recall.
Q. Okay. Do you recall offering such an

opinion in 2015?
A. I mean, not offhand, no. Huh-uh.
Q. At this time we're going to look at a document. I'm adding it to your -- the folder. You're going to have to refresh the folder --
A. Uh-huh.
Q. -- and then you should see it.
(Whereupon, Plaintiff's Exhibit 1 was marked for identification.)
BY MR. ROLLINS-BOYD:
Q. Let me know when you see the document. Do you -- do you see the document, Mr. O'Connor?
A. I do see it, yes.
Q. All right. And this document is an E-mail from you to Jan Jones; is that correct?
A. Yes, sir.
Q. And it's dated February 27th, 2015?
A. Right.
Q. All right. And Jan Jones at that time was the -- who was Jan Jones at that -- who was -- who is Jan Jones?
A. The Speaker Pro Tem of the house.
Q. Okay. And I want to direct your attention

to the second paragraph of the E-mail, and specifically the last sentence. All right?

In that sentence you state:

"Generally, once a district gets in the 30 to 35 percent black range, it becomes more of a target for Democrats."

Do you see that?

A. I do. Uh-huh.

Q. And what did you mean by this?

A. Well, I mean, I haven't seen this in years. I assume it meant that the district got more politically competitive at that range.

Q. And would that have been -- so you say, generally, once a district gets in that range. Would that have been true for -- applicable to all districts in Georgia?

A. I mean, it might -- it might vary in, you know, some of the districts, maybe, like, in in-town Atlanta, some of the areas around Emory University.

Q. Can you recall any districts for which it would not have been true?

A. I mean, it's not going to -- you know, the districts were different back then. It could have

been maybe some, again, some districts around Emory, Decatur maybe had more of a white liberal base.

Q. And you would agree with me that this -- your assessment in this E-mail is consistent with your previous finding or statement that, in 2014, a district with over 30 percent black tended to vote -- elect Democrats; correct?

A. Correct. It's consistent. Uh-huh.

Q. So setting that document to the side for now, did you -- subsequent to sending this E-mail to Representative Jones, did you perform any other analysis in subsequent years looking at what amount of black population made a district tend to be a target for Democrats?

A. I mean, there could have been, I mean, and I just don't remember specifically.

Q. And if you had performed such analysis, would you have kept a record of it?

A. Yes. Uh-huh.

Q. And would that record, would it have been -- what would the record have been?

A. What do you mean?

Q. Would it have been an E-mail similar to the one you sent Representative Jones?

A. I mean, I would have -- it could have been an E-mail, sure.
Q. Could it have been a memo?
A. Or a memo in an E-mail, yes.
Q. All right.
A. Uh-huh.
Q. And would those types of documents have been saved by the L.C.R.O.?
A. I -- probably so. I mean, I don't know for sure.
Q. And where would those documents have been saved? How would they have -- or strike that.
How would those documents have been saved? In hard copy? Electronically? What's the --
A. Probably --
Q. (Inaudible due to cross-talk).
A. -- electronically.
Q. Uh-huh. Okay. So they would have been saved electronically.
And do you recall -- so you said you may have performed this analysis subsequently, you might have, and there are records.
Do you recall who you would have performed that analysis for?
A. No. Huh-uh.

Q. Okay. Do you recall the findings of any of the subsequent analysis that you may have performed?

A. No. Huh-uh.

Q. Do you recall what specific years you performed those analysis [sic]?

A. No. Huh-uh.

Q. But to the extent you performed them, those analysis would have been saved by the L.C.R.O.?

A. Right. Uh-huh.

Q. So I think earlier you said you had no -- that the range of 30 to 35 percent would likely probably still be true for a district to be a target for Democrats even today; is that correct?

A. In a general sense, yes.

Q. In a general sense?

And have you shared -- or during the most recent redistricting cycle in 2021, did you share that opinion or -- did you share that opinion with anyone? Do you recall talking about that with anyone?

A. No, I don't. No. Huh-uh.

Q. You don't recall, you didn't speak about at all that opinion to employees at the L.C.R.O.?

A. No. Huh-uh.
Q. Members of the legislator -- legislature?
A. No. Not that I recall, no.
Q. Okay. Are you familiar with the concept of racially polarized voting?
A. Yes, sir. Uh-huh.
Q. And what is your understanding of racially polarized voting?
A. In a general sense, I think it's when African-American voters vote dramatically different from white voters. Or the same could be for maybe Hispanic versus white or Asian versus white.
Q. Okay. That is my understanding as well.
Do you have any reason to believe that black voter polarization or cohesion is lower today than it was in 2014?
A. No. I don't think any reason to believe that, no. Huh-uh.
Q. Do you have any reason to believe that Hispanic voter cohesion is any lower today than it was in 2014?
A. I don't know.
Q. All right. So you've testified that, in a district with the percentage either over 30 percent or with the range of 30 to 35 percent, the

V.A.P. -- black population would either tend to elect Democrats or it would be a target, a district would be a target for Democrats.

With that in mind, if a legislator wanted to redraw a district that contained over 30 percent black population that would tend to elect Democrats in such a way that it was now competitive or was likely to elect a Republican, that would require lessening the amount of black voting age population in that district; correct?

A. Correct. Uh-huh.

Q. All right. And in order to lessen the amount of black voting age population in that district, one of two things would have to happen; right?

Either black voting age population would have to be removed from that district and put in another district; correct?

A. Correct. Uh-huh.

Q. Or white voting age population would have to be moved into the district such that the overall population increased, diluting the percentage of black voting age population; correct?

A. Right. Uh-huh.

Q. Okay. All right. I know we're a little

early, but I want to take a break there and just look at my notes. So let's take about ten minutes, and then we'll come back.

A. Okay.

THE VIDEOGRAPHER: The time is 10:10. We're off the record.

(Whereupon, a discussion ensued off the record.)

(Whereupon, there was a brief recess.)

THE VIDEOGRAPHER: The time is 10:24. We're back on the record.

BY MR. ROLLINS-BOYD:

Q. Okay. Before we move on to a new topic, I think you previously testified that you may have performed analysis looking at the amount of black voting age population that would have caused a district to elect Democrats.

My question is, who would you have been performing that analysis for?

A. Maybe a legislator.

Q. And so that information would have been provided to legislators; is that correct?

A. It could have been, yes. Uh-huh.

Q. And just quickly before we move on, did

you discuss your deposition at all during the break?

A. No. Huh-uh.

Q. Okay. All right. Shifting gears just a little bit, am I correct -- or in 2021, November 2021, a special session was called with respect to redistricting in Georgia; correct?

A. Correct. Huh-uh.

Q. But you would agree with me that there were discussions about redistricting even before the special session was called?

A. Oh, absolutely, yes. Uh-huh.

Q. And people were thinking about redistricting in Georgia before the special session was called?

A. Yep. Yes, sir. Uh-huh.

Q. And the -- like, there were public hearings held before the session was called?

A. Yeah, there were. Uh-huh.

Q. And legislators were requesting data even before the special session was called?

A. Yes. Uh-huh.

Q. Okay. How early would you say that discussions about the 2021 redistricting process started in Georgia? As early as 2019 maybe?

A. In terms of what, public opinion or the legislature?

Q. In terms of discussion -- or in terms of your office receiving requests for information about districts?

A. It would have been, yeah, 2021.

Q. Only 2021? So no requests before then?

A. Well, we didn't have any census data until, I think, August of that year because it was delayed because of COVID. So we didn't have anything really to hand over if they'd asked for data.

Q. Well, would there have been potentially requests about the political performance of districts even before the census data was released?

A. Oh, there could have been, sure. Uh-huh.

Q. And so there could have been requests about the make-up of the districts at the time -- you know, before the census data was released?

A. Oh, before redistricting, right. Uh-huh.

Q. And about the amount of black voting age population in the district before it was released?

A. Right. Yeah. Total population, yeah.

Q. And total population. Okay.

I want to look at another document. This

document is labeled LEGIS 00010953. And this is going to be marked as Exhibit 2. Give me one second to drag and drop it over.

(Whereupon, Plaintiff's Exhibit 2 was marked for identification.)

MR. JAUGSTETTER: Hit the "back" button.

THE WITNESS: I'm sorry. Hit what?

BY MR. ROLLINS-BOYD:

Q. It should be in your folder.

MR. JAUGSTETTER: And now refresh it, hit refresh, the circle. Okay. Yeah. Just hit the button.

BY MR. ROLLINS-BOYD:

Q. Now, I want you to take a moment and review the document, and let me know when you've had a chance to review it.

(Whereupon, the document was reviewed by the witness.)

THE WITNESS: Yeah. I've read it, uh-huh.

BY MR. ROLLINS-BOYD:

Q. All right. And so this is an E-mail chain from June 2019; correct?

A. Correct. Uh-huh.
Q. Between you and Mike Dudgeon?
A. Dud -- or Dudgeon, yes.
Q. Dudgeon. Okay. Sorry. Mike Dudgeon?
A. Uh-huh.
Q. And Mike Dudgeon was the director of policy for the lieutenant governor's office; is that correct?
A. No. I -- oh, I think he was in the state legislature at one time, too.
Q. Okay. If you scroll to the very first in time E-mail, which is at the bottom of the document.
A. Huh-uh.
Q. You will see that Mike Dudgeon's job title and office affiliation is listed there.
A. Oh, I see in the E-mail it says lieutenant governor's office. Yeah, I think he -- unless it's another Mike Dudgeon, I think we had a Mike Dudgeon in the legislature, too, at one time.
Q. But Mike Dudgeon from this E-mail was the director of policy for the Office of the Lieutenant Governor?
A. Of the lieutenant governor, I see in the E-mail, right. Uh-huh.

Q. And in his E-mail, that E-mail you're looking at there on June 24th at 5:23 p.m., he is talking to you about an article in A.J.C. about Forsyth County and the Asian demographic.

Do you see that?

A. I'm sorry. I'm...

Q. So looking at the content of the E-mail.

A. Oh, is it between one -- on Page 2?

Q. All the way at the bottom, yeah, Page 2, the first, the very first E-mail in the chain, June 24th, 2019 at 5:23 p.m.

A. Oh, I see June 25th, 2019.

Q. Keep scrolling down.

A. Oh, okay. Okay.

Q. There's one more E-mail at the bottom.

A. Oh, about the interesting article in the A.J.C.?

Q. Yes.

A. I see, yes.

Q. Okay. What -- do you understand, why was Mr. Dudgeon, Dudgeon, sending you this information?

A. He's -- I guess he was trying to get demographic information on Forsyth County.

Q. And if we look at the E-mail, so scrolling up to the June 25th, 2019, 1:05 p.m. E-mail from

Mr. Dudgeon, do you see that, that starts with --
A. Yes --
Q. -- "thanks Dan"?
A. -- I do.
Q. In the second kind of paragraph, he asks when does your office -- or:
"When can your office start to look at any maps for 2021 redistricting?
"Do you have to wait until census gets you data in late 2020/early 2021? I thought they released their 'estimates' or whatever they do."
Do you see that?
A. I do, yes, at the top. Uh-huh.
Q. And would it be fair to say that Mr. Dudgeon was, or Dudgeon, was interested in what was happening with respect to redistricting at this time, or curious as to what your role was with redistricting at this time?
A. Yes, you could say that. Uh-huh.
Q. All right. Let's set this E-mail aside, and I want to look at a different document. This document is marked -- or is going to be marked Exhibit 3. It's Bates stamped LEGIS 00011021. It

should be in your folder in just a second.

(Whereupon, Plaintiff's Exhibit 3 was marked for identification.)

BY MR. ROLLINS-BOYD:

Q. Let me know if you see the document.

MR. JAUGSTETTER: Remember the arrow at the top left of the black screen?

THE WITNESS: Uh-huh.

MR. JAUGSTETTER: (Inaudible). There.

THE WITNESS: Oh, okay.

MR. JAUGSTETTER: (Inaudible).

THE WITNESS: Yes. From -- to Dave Belton?

BY MR. ROLLINS-BOYD:

Q. Yes. So take a minute and you can look at it, and I'll have a couple questions about it.

A. Uh-huh.

(Whereupon, the document was reviewed by the witness.)

THE WITNESS: I've had -- I've gone through it.

BY MR. ROLLINS-BOYD:

Q. And this is an E-mail communication

between yourself and Representative Dave Belton from November 2019; correct?

A. Right. Uh-huh.

Q. And Representative Belton was a member of the Republican Party in Georgia at that time; is that right?

A. Right. He was in the house at that time, a Republican.

Q. Okay. And in his E-mail, his initial E-mail, the one at time 10:32 a.m. on November 5th, he asked for, among other things, "the ratio of race inside Newton County."

Is that correct?

A. Right.

Q. He also asked for "the ratio of race within District 112 as a whole." Is that correct?

A. Yes. Uh-huh.

Q. What was your understanding of why Representative Belton wanted this information?

A. He probably was just curious as to the population of this district.

Q. Okay. In response to his E-mail, if you scroll up and look at your E-mail at 4:14 p.m., in the first paragraph, the last kind of full sentence, you say:

[As read] "The 2010 census data is 'pretty old' at this stage. But for comparison purposes, at the time your district was 23 percent black overall in population and 3 percent Hispanic (data for the whole district, not just the Newton portion)."

Do you -- do you see that?

A. Yes.

Q. Okay. And you would agree with me that this type of data, the amount of black population and Hispanic population, would be useful in determining the political performance of a district; correct?

A. Correct. Uh-huh.

Q. It would also be useful to know in determining how to draw a district or redraw a district if you wanted to make it competitive for a Republican candidate; correct?

A. Correct. Uh-huh.

Q. In your E-mail I noticed that you're E-mailing Representative Belton at his Gmail E-mail account?

A. Uh-huh.

Q. Is it common for you to communicate with

legislators at their personal E-mail?

A. Sometimes they do that. I mean, usually it's their house accounts. But maybe, you know, if they're -- some other reason it goes to their personal one maybe, you know, since they're not here most of the year.

Q. So it happens frequently, it's not -- I mean, it's -- you can't be --

A. I mean, I don't know if it's -- I don't know if it's frequently, but it does happen.

Q. Okay. All right. I want to look at another document. This will be tab -- or this will be marked as Exhibit 4. The Bates stamp is LEGIS 00011028, and it has an attachment ending in 029. I'm going to add both to the folder now.

(Whereupon, Plaintiff's Exhibit 4 was marked for identification.)

BY MR. ROLLINS-BOYD:

Q. Let me know when you see them.

MR. DAVIS: Is this four and five?

MR. ROLLINS-BOYD: Oh, yes.

BY MR. ROLLINS-BOYD:

Q. So this will be Exhibit 4 and 5. Excuse me.

(Whereupon, Plaintiff's Exhibit 5 was marked for identification.)

MR. JAUGSTETTER: See the little round circle over there?

THE WITNESS: Yes.

MR. JAUGSTETTER: (Inaudible). This one right here. No, that little round arrow.

THE WITNESS: Oh, okay. Uh-huh.

MR. JAUGSTETTER: It's the fourth one, yeah. (Inaudible).

(Whereupon, the document was reviewed by the witness.)

THE WITNESS: Okay. I see it.

BY MR. ROLLINS-BOYD:

Q. All right. So this is an E-mail from June 21st, 2019 from you to Representative Washburn; is that correct?

A. Correct.

Q. All right. And Representative Washburn is a Republican house member in Georgia; correct?

A. Right. From Macon, uh-huh.

Q. And in your E-mail, you are providing him with information about District 143, which is James

Beverly's district; correct?
A. Correct.
Q. And James Beverly is a Democratic house member?
A. That's right.
Q. And in your E-mail you provide him information about the boundaries of the district; is that correct?
A. Right. Uh-huh.
Q. You also note that, in 2018, the district was 59 percent black; is that correct?
A. Yes.
Q. All right. I noticed in this E-mail that there is no preceding E-mail and a -- with a request from Representative Washburn.
So why -- how did you know to provide this information to Representative Washburn?
A. I don't recall. He may have been up here for a meeting and maybe I ran into him up here.
Q. And to the best of your recollection, why did Washburn request this information?
A. I don't know.
Q. Okay. Well, would you agree with me that this type of information or data would be helpful to evaluate the political performance of James

Beverly's district?

A. Yes. Uh-huh.

Q. And it would be helpful in determining how to potentially redraw that district if the goal was to make it more competitive for a Republican; correct?

A. Yes, it would be helpful.

Q. All right. Setting -- okay. Setting that aside, I want to look at another exhibit. This will be marked -- this exhibit has an attachment. This will be marked as Exhibits 6 and 7. This is --

A. Hold on.

Q. -- LEGIS --

A. You're skipping to the next?

Q. Okay. Yeah. This is LEGIS 00011102, and the attachment ends in 03. Give me one second to add those to your folder.

(Whereupon, Plaintiff's Exhibits 6 and 7 were marked.)

BY MR. ROLLINS-BOYD:

Q. If you refresh your folder, you should see them.

A. A map of the district?

Q. That would be the attachment. Zero --
A. Okay.
Q. 002 [sic] will be the cover E-mail.
MR. JAUGSTETTER: It's on the computer, right there.
THE WITNESS: Uh-huh.
MR. JAUGSTETTER: Now refresh and go down.
Now, which exhibit do you want him to look at?
MR. ROLLINS-BOYD: Exhibit 6.
MR. DAVIS: If you refresh, Mr. Jaugstetter, if you refresh the page, the numbers should be on there now, Exhibits 6 and 7.
THE WITNESS: Okay. I see it. Sheena Wright.
BY MR. ROLLINS-BOYD:
Q. All right. Let me know when you've had a chance to review the document.
(Whereupon, the document was reviewed by the witness.)
THE WITNESS: Okay. I've seen it.
BY MR. ROLLINS-BOYD:
Q. All right. The first in time E-mail, the

one at the bottom from Sheena Wright, that's dated June 18th, 2020, and it was sent at 9:53 a.m.

Do you see that?

A. I do.

Q. And Sheena Wright is the executive assistant in the Office of the Speaker Pro Tem in Georgia; is that correct?

A. Yeah. At that time, yes. Uh-huh.

Q. And who was the Speaker Pro Tem at that time in Georgia?

A. Jan Jones.

Q. Okay. And in Ms. Wright's E-mail, she requests the black V.A.P. for all of the house districts; is that correct?

A. That's right.

Q. All right. And to confirm, Representative Jones or Speaker Jones, the pro tem, was also the pro tem in 2015 when you sent an E-mail explaining that a district that was 30 to 35 percent black would be competitive for Democrats; correct?

A. Yeah. She's been Speaker Pro Tem I think since 2010, so that's correct.

Q. And I know you're not a recipient or a sender on the top E-mail, but to confirm, that -- the information requested, the black V.A.P. for the

state house districts, that was provided to Ms. -- to Sheena Wright by the speaker?

A. Yes. Looks like it. Uh-huh.

Q. Would, in looking at that, in looking at the data provided, would Representative Jones be able to determine the percentage of black V.A.P. in each of the districts that the data was provided for?

A. Yes. Uh-huh.

Q. So she would be able to determine if the district was 30 to 35 percent black?

A. She would, yes. Uh-huh.

Q. Okay. Thank you. I am done with that document, so you can move that to the side.

So I want to step back and take a look more broadly at your role in the L.C.R.O. and your work with redistricting in Georgia. Okay?

A. Uh-huh.

Q. So you are a data analyst for the Georgia General Assembly and the L.C.R.O.; correct?

A. Correct. Uh-huh.

Q. When did you start in your position?

A. I'm sorry. Say that again.

Q. When did you start in your position?

A. Oh, in 2005.

Q. Okay. And when you started in your position, what were your job responsibilities?

A. Well, I was new to the office, so it was helping with providing maps. You know, people wanted map requests, reports, anything of that nature.

Q. Have your responsibilities -- or are you in the same position today that you were when you started in 2005?

A. Basically, yes. Uh-huh.

Q. And are your -- were your responsibilities -- or are your responsibilities today consistent with your responsibilities when you started in 2005?

A. Yeah, I would say so, yes.

Q. They haven't changed substantially in any way?

A. Not really, no. Huh-uh.

Q. Haven't been reduced?

A. No. Huh-uh.

Q. You haven't had things taken off of your plate and given to other people?

A. No. Huh-uh.

Q. Okay. So when you started at the L.C.R.O. in 2005, would it be fair to say you were

responsible for looking at and provided data to legislators?

A. Yeah, that would be correct. Uh-huh.

Q. And also anyone else who may have asked for it?

A. Right. Uh-huh.

Q. Okay. And the type of data you would have provided, that would have been demographic data?

A. Right. Uh-huh.

Q. Political data?

A. Uh-huh. Right.

Q. Yes? Voter --

A. Yes.

Q. -- registration data?

A. Yes. Uh-huh.

Q. Turn-out data?

A. Yeah, we had that back then, uh-huh.

Q. Racial data?

A. Yes.

Q. And today, are you still responsible for reviewing and providing that type of data?

A. I still provide that, yes. Uh-huh.

Q. And when you started in 2005, would you have been responsible for performing analysis about the types of data you were responsible for?

A. Analy -- what do you mean by --
Q. Would you have been responsible for reviewing that data and providing an opinion or a summary of what the data said in any way?
A. I mean, it's, like, 18 years ago. I mean, I could have been. I don't remember exactly what I was doing back then.
Q. And that's fine. My question is, would -- are you still responsible for reviewing that type of data and providing analysis and summary of the data today?
A. Yes. Providing data, right. Yes. Uh-huh.
Q. And would you have been responsible for reviewing and providing analysis of that data in 2021?
A. You mean in terms of the final plans or --
Q. In terms of your job responsibilities. Was it your responsibility in 2021 to review the data, you know, demographic, political, turn-out, would you have been responsible for reviewing that and providing analysis or summaries of that data in 2021 as well?
A. Yeah, after -- yeah, people could -- yeah, after the maps were passed, yes.

Q. Only after the maps were passed?
A. Well, in terms of providing -- you mean in terms of providing data on the maps or --
Q. Well, I'm -- so you testified that, as part of your job, you review different types of data; correct?
A. Uh-huh. Right.
Q. And I think you testified that, in looking at the data, you would sometimes perform summaries or analysis of the data.
A. Right.
Q. My question is, generally in 2021, were you responsible -- were you still responsible for doing that? Was that part of your --
A. I would say so, yes. Uh-huh.
Q. Okay. And specifically, I want to talk about who you might have provided this type of data to. Okay?
You would agree with me you would have provided it to legislators?
A. Right. Uh-huh.
Q. And you would have provided it to -- or maybe -- who else would you have provided it to? Let's ask that question instead. Who would you have --

A. It could be consultants, members of the general public, counties, cities.

Q. Maybe the governor's office or his staff?

A. Could be the governor's office, yes. Uh-huh.

Q. The lieutenant governor's office or staff?

A. Oh, yeah. Yeah, I mean, it could be other branches of state government, sure.

Q. Okay. Taking a step back, I want to talk about your responsibilities for redistricting in two -- the 2005, 2006 time frame.

Would you agree with me that you were involved with adjusting state district -- state house districts in the 2005, 2006 time frame?

A. Yes. I recall we did some mid-term redistricting.

Q. Okay. And when you were working on the redistricting, you were working with legislators to make the adjustments; correct?

A. Correct. Uh-huh.

Q. And as part of your work at the time, you were actually drawing maps; is that correct?

A. Right. Uh-huh.

Q. And that was all consistent with your job responsibilities at the L.C.R.O.?

A. Right. Uh-huh.
Q. Looking again at, let's say, 2011, as part of your job you were involved with state house redistricting; is that correct?
A. Right. Uh-huh.
Q. And you were meeting with members of the legislature as part of your duties?
A. Yeah. Uh-huh.
Q. And in those meetings, you were actually looking at maps with the legislature -- legislators; is that correct?
A. Yes. Uh-huh.
Q. And as part of that process, you were actually drawing maps with the legislators; is that correct?
A. Right. Uh-huh.
Q. And that was consistent with your roles and responsibilities with -- at the L.C.R.O.; correct?
A. Yes. Uh-huh.
Q. And I want to come back to the actual process of drawing maps, because I'm interested to see how that works. But I think you've testified that your roles have stayed the same.
So throughout your position at the

L.C.R.O., have you been involved in any other redistricting cycles?

A. Beyond what, the --

Q. Well, so we talked about 2005, 2006. We talked about --

A. Uh-huh.

Q. -- 2011.

A. Yeah.

Q. Let's just focus in on the most recent one. With -- what was your involvement with the 2021 redistricting cycle?

A. It was mainly meeting with members that might, you know, want to discuss about what they wanted in their districts.

Q. And when you say "meeting with members," you mean members of the legislature?

A. Right. Uh-huh.

Q. All right. Specifically do you recall meeting with Representative Bonnie Rich?

A. No. Huh-uh.

Q. Do you recall meeting with Senator John Kennedy?

A. No. Huh-uh.

Q. What about Speaker Pro Tem Jan Jones?

A. No.

Q. What about Speaker Ralston?
A. No. Never met with him.
Q. What about anyone from the leadership in either the house or the senate?
A. No. Not that I remember, no.
Q. What about anyone from the governor's office?
A. I don't remember offhand.
Q. The lieutenant governor's office?
A. I don't remember.
Q. The Secretary of State's office or staff?
A. I don't remember.
Q. Do you recall meeting with Bryan Tyson during the redistricting process?
A. No. Huh-uh.
Q. What about anyone from Mr. Tyson's office or staff?
A. No. Not that I remember, no. Huh-uh.
Q. What about any political interest groups, such as the Heritage Foundation?
A. No, I didn't meet with them. Huh-uh.
Q. What about any G.O.P. groups?
A. I mean, not that I recall offhand.
Q. Any -- okay. So you've said that you don't recall meeting with certain members or people

from certain groups, but that doesn't mean you didn't meet with them; isn't that correct?

A. (Whereupon, there was no audible response by the deponent.)

Q. You said that you --

A. I mean, it could be. I just don't remember offhand.

Q. And I think you testified that, as part of 2021, you were responsible for meeting with members to discuss what they might have wanted in their districts.

What type of information were you providing these members during the 2021 redistricting process?

A. Well, I think -- I think some of the meetings were happening before we -- before we had the 2020 census data, so it could have been, you know, general feelings, like the geography they wanted in the districts.

Q. What about after the census data, what information would you have been providing the members?

A. Well, after the sense -- well, after the census came out, we would have had, of course, the population breakdown for all the districts based on

the 2020 census.

Q. And before the census, who were you meeting with? Which members do you recall meeting with?

A. Well, I think the ones I mainly remember were Representative Joe Campbell and Representative Richard Smith.

Q. Now, what about after the census data, who do you recall meeting with?

A. I missed that last question. We had a technical difficulty.

Q. Sorry. So what about after the census data came out, which members do you recall meeting with?

A. I think after the main meeting I remember is we had a meeting of some legislators, I think Ms. Wright was in there with me, of some legislators from northeast Georgia --

Q. All right.

A. -- like your Athens and Savannah River Valley.

Q. And in addition to actually having meetings with the members, were you E-mailing the members about the data that they were requesting?

A. I could have been. I don't recall

specific instances, but certainly could have been.

Q. Now -- okay. What happened at the meetings?

Let's start with the pre-census meetings. You indicated that you met with a couple members. What happened during those meetings? What was discussed?

MR. JAUGSTETTER: I'm going to assert an objection.

Don't do anything. You're fine.

I'm going to assert an objection to the discussions that Mr. O'Connor had with any members of the General Assembly. They do not waive their legislative privilege.

I'm going to assert an objection on that basis and instruct the witness not to answer.

BY MR. ROLLINS-BOYD:

Q. Okay. Understanding your counsel's objection, I don't want to know the specifics of what was discussed, but what -- generally what topics were discussed?

MR. JAUGSTETTER: You can answer that.

THE WITNESS: Just their general area

with redistricting.

BY MR. ROLLINS-BOYD:

Q. In the meetings -- in the meetings after the census, what topics were discussed with the members?

A. Well, that's where we were doing some, I think we were doing some drawing of the northeast Georgia area.

Q. And was that for the house or for the senate?

A. House.

Q. And so you said "we were doing some drawing." Does that mean that you were involved in creating maps with these members?

A. Well, I think Gina Wright, our director, was in here, and she was doing the, yeah, I guess the mapping, but I was in the meeting.

Q. And who else was in the meeting?

A. I think it was Representative Alan Powell, Trey Rhodes, I think Victor Anderson. And there were a few others, but I don't remember offhand.

Q. Do you remember approximately how many meetings you had with members after the census data was released?

A. I mean, that was the main one I remember

in terms of, like, doing any sort of drawing or meeting with them.

Q. Do you recall approximately how long that meeting was?

A. The meeting with the northeast legislators? It probably ran a couple of hours.

Q. Did you have any other responsibilities or involvement with the 2020 redistricting cycle?

A. The main thing was just to meet with members and if, you know, people had requests for, like, population in their districts, anything like that. That was the main things.

Q. Outside of the individuals we've already discussed, do you recall anyone else requesting data after the 2021 census information was released?

A. I mean, there could have been. I don't remember specifically.

Q. If they requested data, would that be -- would those requests have come in E-mails?

A. Most likely, yes. Uh-huh.

Q. And those E-mails would be saved or archived at the L.C.R.O.?

A. Right. Uh-huh.

Q. And your responses to those requests

containing your -- either the data or your analysis, that would also be saved and archived at the L.C.R.O.?

A. Right. Uh-huh.

Q. And among the types of data that people were potentially requesting, would that have included racial data or racial breakdowns of districts?

A. Most likely, yes. Uh-huh.

Q. One second.

Did you -- outside of what we've talked about, did you have any other involvement with the redistricting cycle?

So outside of the meeting that you talked about and sending data, did you have any other role in redistricting?

A. I mean, that was basically it, yeah. Uh-huh.

Q. Okay. So you mentioned that you were in the room when map drawing occurred, and I want to understand a little bit about the process.

A. Uh-huh.

Q. Am I correct that maps drawn in Georgia are drawn using Maptitude?

A. The Maptitude software, right. Uh-huh.

Q. Are you trained on Maptitude?
A. Yes I am. Uh-huh.
Q. And have you ever used it before?
A. Oh, I have, yes. Uh-huh.
Q. And so you're kind of familiar with how it works, that would be fair to say?
A. Not the ultimate expert on it but, you know, basic understanding, yes.
Q. Okay. And when you're in the room with these legislators in -- after the census data was released in 2021 and maps are being drawn, is the map being projected so that everyone in the room can see it?
A. Yes. We have a big screen in our office. We can see the map.
Q. And when -- you know, in your general experience, when redistricting is occurring and maps are being drawn, are there often drafts of maps that are created?
A. Yes, sir. Uh-huh.
Q. And are those maps saved in any way?
A. They would be saved in the members' folders.
Q. In the -- okay.
And so if a member came in on a different

date, they could pull up the map and see what they had previously done?

A. Right. That would be possible, yes. Uh-huh.

Q. And are those folders a part of the Maptitude program or are they saved in, like, a separate members' folders kind of repository?

A. Well, they have, like, folders under -- in our Maptitude system so you can, you know, save maps to their folders, yes.

Q. Okay. And so when you're in the room and you're creating maps and post-census data in 2021 and it's displayed on the wall, what type of data is, you know, depicted on the wall with respect to Maptitude?

A. There's, you know, population, voting age population, racial demographic data.

Q. Okay. And as I understand it in Maptitude, when you are making a change to a district, there's a little summary that will pop up and will show you how that affects the demographics or maybe the racial make-up in that district.

Is that true?

A. Right. Uh-huh.

Q. All right. And you mentioned previously

that there were drafts in the members' folders. So can you still access those drafts?

A. I think you can, yes. Uh-huh.

Q. So they would still be in the Maptitude folder for --

A. As far as --

Q. (Inaudible due to cross-talk).

A. -- I know, yes. Uh-huh.

Q. And you know, we're talking a little bit about the data that Georgia -- that, I guess that they would have used, and you said it would show the racial data, the demographic data, things of that nature.

I want to confirm this. Is it true that Georgia does not maintain voter registration data that tracks partisan affiliation?

A. Not -- you mean with the Secretary of State, you mean?

Q. Yes.

A. No. I think they, yeah, I think they have records on people voting in primaries, yes.

Q. Okay. But voter registration data in Georgia typically isn't -- there are no -- you don't register with a party?

A. That's correct. We don't have -- we've

never had party registration in Georgia.

Q. But Georgia does have voter registration information that includes race; correct?

A. It does, yes. Uh-huh.

Q. And that information is included in Maptitude?

A. Well, yeah, we did -- we do have voter registration, but it's only updated every couple of years. We don't update it monthly in our system. Secretary of State updates voter registration monthly.

Q. So prior to the 2021 redistricting cycle when you were drawing maps, when was the last time that information had been updated?

A. Well, we usually update our voter registration and our political data every two years, like, after every even number -- you know, we have statewide elections in Georgia, so after every even year, like 2016, '18 and '20.

Q. So it would have been updated as recently as 2020?

A. Going into the 2021 redistricting, right. Uh-huh.

Q. And you know, with respect to the racial data that was in Maptitude that you could see on

the screen that was being used, how helpful is that data in redrawing districts in Georgia?

A. The Maptitude data or --

Q. Yeah, the racial data in Map --

A. -- (inaudible due to cross-talk).

Q. The racial data in Maptitude, how helpful is it?

A. I would say it would be helpful, uh-huh.

Q. Helpful in determining, you know, what makes a district lean Democrat or Republican?

A. Yes. I would say that, yeah. Uh-huh.

Q. Helpful in determining how you have to change that population to make a district more Democrat or Republican?

A. Yes. Uh-huh.

Q. So I want to confirm something else that I understand. Political data in Georgia, is that only at the precinct level?

A. Well, yeah. You mean -- yes. Uh-huh. Well, at the precinct and the county level, of course.

Q. At the precinct and the county. But --

A. Right.

Q. -- there's no political data at the block level; correct?

A. No. Huh-uh.
Q. But there is racial data at the block level?
A. Right. Uh-huh.
Q. Okay. Are you familiar with the concept of precinct splits?
A. Yes, sir, I am.
Q. And what is a precinct split?
A. A precinct split could be an instance where a precinct is split into multiple districts, whether it's legislative, you know, congressional or local.
Q. Okay. You would agree there's no way to assess political performance or partisan performance below the precinct level; correct?
A. Right. Uh-huh.
Q. Could you use race to determine the political performance or the partisan performance at the block level?
A. I mean -- I mean, you could look at that, yes. Uh-huh.
Q. Did you look at kind of the racial data at the block level to determine political or partisan performance?
A. No. Huh-uh.

Q. I think we're going to go ahead and take another break now, another ten minutes, and then we'll reconvene.

A. Uh-huh.

THE VIDEOGRAPHER: The time is 11:04. We're off the record.

(Whereupon, a discussion ensued off the record.)

(Whereupon, there was a brief recess.)

THE VIDEOGRAPHER: The time is 11:15. We're back on the record.

BY MR. ROLLINS-BOYD:

Q. Mr. O'Connor, during the break did you discuss your deposition with anybody?

A. No. We just talked about St. Patrick's Day being today.

Q. Okay. Happy St. Patrick's Day.

A. Wish we were in Savannah.

Q. I want to go back to -- I mean, you previously testified that you were drawing maps with members about northeast Georgia.

How do you define northeast Georgia? What's your definition of northeast Georgia?

A. Well, I would say in this instance it's

roughly between Interstates 20 and 85, like, between Athens and Augusta, the Savannah River Valley --

Q. Okay.

A. -- and a little bit up in that area.

Q. Okay. What specific counties make up or are part of northeast Georgia?

A. Well, I mean, you could easily list over a dozen. I would say Clarke County would be Athens. Morgan County, Greene. Some counties on the Savannah River, like, I think Lincoln, Elbert and Hart. Stephens County.

So kind of I would say counties that are some distance from the, like, Savannah River border or the Savannah River.

Q. Is Gwinnett in northeast Georgia?

A. I mean, you could say it is. I mean, it's kind of -- it could be -- like, north and south Georgia could be fluid definitions. But I was talking more about mainly rural parts of northeast Georgia.

Q. Okay. And do you recall specific districts that were discussed that make up northeast Georgia?

A. You mean in our meeting?

Q. Yes.
A. Well, the ones I was talking about, Alan Powell, Trey Rhodes, I think Victor Anderson. And there may have been a few others. I just don't remember who.
Q. Okay. And you previously testified that there were map files in Maptitude for the different members where drafts of maps were saved?
A. Right.
Q. Do you recall that? Right.
A. Uh-huh.
Q. Do -- are you aware of if there's a map file for Senator Kennedy?
A. I mean, I've never looked at it. I assume there would be, yes.
Q. And what about Representative Jones?
A. Speaker Pro Tem Jones?
Q. Yes.
A. Yes, there would probably be a file for her.
Q. And Representative Bonnie Rich?
A. Yes. Uh-huh.
Q. And did you draw -- did you draw any maps for Senator Kennedy?
A. No. Huh-uh.

Q. Did you draw any maps for Speaker Pro Tem Jones?
A. No.
Q. Did you draw any maps for Representative Rich?
A. No.
Q. Okay. Taking a step back, when you say you didn't recall looking at their folders, what did you mean by that?
A. Well, I mean, I -- they -- I assume they have folders, like, where they keep their maps, but I haven't -- you know, not been looking for specific plans of theirs.
Q. Okay. Did you provide any data to Speaker Pro Tem Jones?
A. During the 2021 redistricting?
Q. Yes.
A. I may have. I don't recall.
Q. Okay. Did you provide any data to Senator Kennedy during the 2021 redistricting process?
A. I mean, not that I remember, no. Huh-uh.
Q. Okay. What about Representative Rich, did you provide any data to Representative Rich?
A. I mean, not that I remember offhand, huh-uh.

Q. But it's possible, you just don't recall today?
A. It's possible, yes. Uh-huh.
Q. And if you provided that data, it would have been via E-mail?
A. Most likely, yes. Uh-huh.
Q. And those E-mails would be saved in your filed at the L.C.R.O.?
A. Right. Uh-huh.
Q. All right. And do you recall performing any analysis or looking at the senate district that belongs to Senator Kennedy as part of --
A. No. Huh-uh. No. Huh-uh.
Q. Do you recall performing any analysis or looking at the district belonging to Representative Rich?
A. No. Huh-uh.
Q. What about the district for Speaker Jones?
A. No. Not that I remember, no.
Q. Are you familiar with block equivalency files?
A. Yes. Uh-huh.
Q. And what is a block equivalency file?
A. I mean, I don't use it that much. I think it's a form of software that can have, you know,

maps or data on there.

Q. Okay. So you don't use it, but you are kind of familiar with it?

A. I've heard it, yeah. I don't know it like our G.I.S. guy does.

Q. Are block equivalency files part of Maptitude? Are they installed in Maptitude? Do you know that?

A. Not sure on that technical point, huh-uh.

Q. All right. Kind of shifting gears, I want to look at a document. This will be Exhibit 8. This document is Bates stamped LEGIS 00016579. Give me one second, and I'm going to add it to the folder.

(Whereupon, Plaintiff's Exhibit 8 was marked for identification.)

BY MR. ROLLINS-BOYD:

Q. It should be in your folder.

MR. JAUGSTETTER: Refresh this.

(Whereupon, the document was reviewed by the witness.)

THE WITNESS: Okay. I see it.

Uh-huh.

BY MR. ROLLINS-BOYD:

Q. All right. And this is an E-mail chain from November 11th, 2021; correct?
A. Right.
Q. And this is an E-mail chain involving you and Ray Smith?
A. Right.
Q. Who is Ray Smith?
A. He's an attorney that's been active in Republican causes.
Q. Okay. And when you say "active in Republican causes," what do you mean?
A. I think, like, the Fulton County and state Republican Party.
Q. And is -- to your knowledge, is Mr. Smith involved with redistricting in Georgia?
A. I don't know.
Q. Do you -- are you aware of if he's got any relationship with members of the Joint Redistricting Committee for the 2021 cycle?
A. No, I don't know.
Q. In the first E-mail, the earlier in time E-mail, you're providing Mr. Smith with a copy of the house proposed map; is that correct?
A. Right. Uh-huh.
Q. What I don't see in this E-mail is a

request from Mr. Smith. So how did you know that Mr. Smith wanted this information?

A. He may have called. He may have called me for it.

Q. Okay. Do you know why Mr. Smith wanted this information?

A. Well, I think he lives in Sandy Springs, so he probably just wanted to know how the districts were, you know, divvied up in Sandy Springs.

Q. And in your E-mail you say that you're going to provide him with the senate map. Do you see that?

A. With the senate map? Let me go back.

Q. Yeah. It's in the middle of the first paragraph. One, two -- three lines down.

A. Right. I see. Yeah. Sorry. I see went over there. Yeah. Uh-huh.

Q. Do you recall if you ever sent him the senate map?

A. No, I don't. Huh-uh.

Q. Looking at the E-mail from Mr. Smith to you --

A. Uh-huh.

Q. -- he asks:

"Are any of the S.S. districts 'lean R'?"

What did you understand him to mean?

A. He's probably looking at sand -- the house districts in Sandy Springs, whether they leaned Republican.

Q. And how would that, based on the information you provided, how would that have been determined? Like, what data would have helped you determine which district -- districts leaned R, or leaned Republican?

A. Well, like we discussed earlier, we could produce, you know, political data on the districts.

Q. And racial data as well?

A. Yes. Uh-huh.

Q. All right. Setting that document aside, I want to look at one more document. This will be marked as Exhibit 9. It is Bates stamped LEGIS 0001197. Give me one second while I add it to the folder. One second.

(Whereupon, Plaintiff's Exhibit 9 was marked for identification.)

BY MR. ROLLINS-BOYD:

Q. And sorry, I may have misspoke. It's

LEGIS 00011997, that's the Bates stamp. And it's marked as Exhibit 9 in your folder now.

MR. JAUGSTETTER: You need to refresh. There it is, yeah.

(Whereupon, the document was reviewed by the witness.)

THE WITNESS: Okay. I see about the committee dinner?

BY MR. ROLLINS-BOYD:

Q. Yes. Are you -- are you familiar with this document, Mr. O'Connor?

A. Yes. Uh-huh.

Q. And it's an E-mail from November 15th, 2021 from Gina Wright to you and others; correct?

A. It is, yes.

Q. And it's an invitation to a dinner with the redistricting members; is that correct?

A. It is, yes. Uh-huh.

Q. And did you attend the dinner?

A. I did, uh-huh.

Q. And during the dinner, do you recall which members were there?

A. No, I don't. We had a pretty big crowd, probably several dozen, so I couldn't tell you that. Huh-uh.

Q. Do you recall if Bonnie Rich was there?
A. She was, yes.
Q. Was Senator Kennedy there?
A. I don't remember.
Q. Do you recall if Speaker Pro Tem Jones was there?
A. No, I don't remember.
Q. Do you recall if any Democratic members of the house or senate were at this dinner?
A. I remember at least one, yes.
Q. Okay. So it was primarily Republican members of the house and senate redistricting?
A. Well, no, I don't know. I mean, there were a lot of people there. I just don't remember specifically. But I think I sat with Brian Prince, who's a state representative from Augusta.
Q. Okay. And during the dinner, did you have any discussions about the redistricting process?
A. I mean, I don't remember what we discussed.
Q. Do you recall if the redistricting process was -- came up at all during the dinner?
A. No, I don't. Huh-uh.
Q. I think I'm almost done, so we're going to take another break, and then I'll let you know if I

have any further questions.

A. Okay.

THE VIDEOGRAPHER: The time is 11:29.

We're off the record.

(Whereupon, a discussion ensued off the record.)

(Whereupon, there was a brief recess.)

THE VIDEOGRAPHER: The time is 11:40.

We're back on the record.

BY MR. ROLLINS-BOYD:

Q. All right, Mr. O'Connor. Just a few more questions. So --

A. Yes, sir.

Q. -- previously you testified that you did not have communications with Senator Kennedy about the 2021 redistricting process.

Did you have any communications with any members of his office or staff about the 2021 redistricting process?

A. Not that I remember, no.

Q. What about members of Representative Rich's office or staff, did you have any communication with them about the 2021 redistricting process?

A. Well, her staff would basically be an administrative assistant since she was the redistricting chair at that time, so there wouldn't have been a big staff to -- in terms of consulting with them.

Q. Well, did you have any communications with her administrative assistant about the 2021 redistricting?

A. I mean, not that I remember, no. Huh-uh.

Q. What about Speaker Pro Tem Jones's office or staff, any communications with her --

A. Not --

Q. -- staff?

A. -- that I remember, no. Huh-uh.

Q. What about Speaker Ralston's office or staff?

A. No. Huh-uh.

Q. What about house leadership staff?

A. No. Not that I remember, no. Huh-uh.

Q. And the senate leadership staff?

A. No.

Q. What about Mr. Tyson's office or staff?

A. I haven't met with Bryan Tyson in years, so no. Huh-uh.

Q. Okay. You previously testified that you

sat in on meetings with respect to northeast Georgia for drawing the maps.

Is it your testimony today that you did not attend meetings for any other areas of Georgia with respect to map drawing for the redistricting process?

A. No. Not that I remember, no. Huh-uh.

Q. Okay. And why would you -- why would you have not -- or I'll try to ask this correctly. Strike that.

Why didn't you participate in meetings for other areas of Georgia with respect to the 2021 redistricting process?

A. You mean in terms of map drawing?

Q. Yes.

A. I don't know. I guess -- you know, I wasn't asked to come to those meetings, so I guess it was just that northeast Georgia one.

Q. Okay. Did you speak to any Congress members about the 2021 redistricting process?

A. I mean, not that I remember offhand. Huh-uh.

Q. Did you speak to any office or staff members for Congress members in Georgia about the 2021 redistricting process?

A. I mean, it's possible. I just -- I just don't remember offhand.

Q. Did you look at or provide any data to individuals from Congress or their staff about the 2021 redistricting process?

A. You mean about the data of their districts after it was done or before?

Q. Before it was done and -- we'll start with before it was done.

A. I mean, I may have. I just, I don't remember offhand. And there could have been some after redistricting, yeah -- I mean, people would order maps, yes.

Q. So it's possible, but you don't necessarily recall?

A. Right. Uh-huh.

Q. Okay. Do you recall drawing any maps, congressional maps, with respect to the 2021 redistricting process?

A. No. Huh-uh.

Q. Did you write any notes about the communications you had with either members or their staffs with respect to the 2021 redistricting process?

A. No notes that I remember, no. Huh-uh.

Q. And to the extent you had communication with people but you don't recall them, it's your testimony all of that information would be -- if it was -- to the extent it was an E-mail, it would be in your "in" box or saved at the L.C.R.O.?

A. Right. Because we were told by legislative counsel to save our E-mails some -- a year or so ago.

Q. And although you don't recall taking notes, if you took any notes, would you have saved them?

A. Probably, yeah, I mean, if I wrote them, like, on a notepad, yes.

Q. Okay. And consistent with the order not to destroy or delete documents, if you had handwritten notes, those would still be in your possession at the L.C.R.O.?

A. Yes. Uh-huh.

Q. Okay. And if you had handwritten notes, where would you have saved them exactly? Like, would they be in a file cabinet? Like, where would they be?

A. Well, at least in a notepad. But I'd have to go back, you know, and see that.

Q. Do you recall ever checking or looking to

determine if you had any handwritten notes about meetings with respect to the 2021 redistricting process?

A. No. I haven't looked recently, no. Huh-uh.

Q. Are you aware of any guidance provided -- are you aware of any guidance provided about the 2021 redistricting process instructing people not to communicate via E-mail with respect to redistricting in Georgia?

A. I don't remember that, no. Huh-uh.

Q. Okay. Are you aware of any other members of the L.C.R.O. staff communicating with either Senator Kennedy or his office or staff about the redistricting process?

A. No. I haven't seen any such E-mails, no. Huh-uh.

Q. Are you aware of any communications by other members of the L.C.R.O. staff speaking with Representative Rich or her staff?

A. No, I'm not.

Q. What about Speaker Pro Tem Jones?

A. No. I don't know of any, huh-uh.

Q. Speaker Ralston's office?

A. No. Not that I know of. Huh-uh.

Q. Any other house or senate leadership?
A. From other members? No. Huh-uh.
Q. What about congressional representatives, do you have any --
A. No. Not -- no. Huh-uh.
Q. Do you recall any members of the L.C.R.O. staff talking to congressional members' staffs or offices at all about the 2021 redistricting process?
A. I mean, not specifically, no. Huh-uh.
Q. Taking a slight step back, about your handwritten notes, I believe you just testified you have not recently looked to see if you have any.
Did you ever look to determine if you had handwritten notes about the 2021 redistricting cycle or process?
A. Before this meeting? No. Huh-uh.
Q. Okay.
MR. ROLLINS-BOYD: And that is all of the questions that I have. It's possible that our colleagues from Dechert may have questions, but that's all for me.
Thank you very much for your time, Mr. O'Connor.
///

EXAMINATION

BY MR. MONTOYA-ARMANIOS:

Q. Hi, I'd like to jump in here. My name is Vincent Montoya, one of the Dechert associates representing the common cause plaintiffs, to ask you a few questions.

A. Okay.

Q. How are you, Mr. O'Connor?

A. Okay.

Q. All right. I won't keep you very long.

So the first thing I want to do is show you exhibit, I believe we're at ten, which will be -- should be uploaded. Let me refresh and make sure.

(Whereupon, Plaintiff's Exhibit 10 was marked for identification.)

BY MR. MONTOYA-ARMANIOS:

Q. Do you see Exhibit 10?

A. Not yet. Hold on just a second.

Q. Okay. Thank you.

A. Yes, I see it.

Q. Perfect. Do you recognize these maps?

A. I do, yes.

Q. Okay. And I'll represent to you that on

the left shows the former Congressional District 6, and on the right represents the new District 6 after redistricting.

A. Right.

Q. And so I'm going to ask you, we can see that there were some areas that were added from District 6 --

A. Right.

Q. -- and some areas that were removed.

A. Uh-huh.

Q. Are you aware of whether any of those changes reflected above were requested by a specific legislator?

A. No, I don't. Huh-uh.

Q. You don't recall or you can't remember who exactly?

A. Who requested that? No, I don't know.

Q. Okay. Do you know if anyone requested specific changes to the map above?

A. No, I don't. Huh-uh.

Q. Okay. Are you aware of any other specific requests made by any legislator relating to the boundaries of District 6?

A. No. Huh-uh.

Q. Okay. But you're not representing that no

one did?
A. I say no because I don't remember anyone specifically asking that, no.
Q. Do you remember generally if anyone did?
A. No. Huh-uh.
Q. Okay. Did you show any legislators any possible changes on Maptitude?
A. To six? No.
Q. To District 6, no?
A. Huh-uh.
Q. Okay. Do you remember any other questions or conversations you had during the redistricting process about District 6?
A. No. Huh-uh.
Q. Any of the requests made?
A. No. Huh-uh.
Q. Okay. And are you aware of the various demographics of the former Congressional District 6? That's the one on the left.
A. In a general sense, yes. Uh-huh.
Q. Okay. Can you share your impression of the socioeconomic features of the old District 6?
A. Yes. I mean, it's a very affluent district, I mean, taking in East Cobb, north Fulton, Alpharetta and Roswell, and then a lot of

north DeKalb County.

It's -- I think it was more a Republican district beginning of the decade and more Democratic toward the end.

Q. Okay. And so that's your analysis of the political orientation of the old District 6 as well, you said more Republican in the past?

A. In the past, yes. At one time, yes. Uh-huh.

Q. How about the racial features of old District 6?

A. I think it was -- I'm pretty sure it was majority white district, but I don't remember exactly the percentage. I think the black percentage may have been, at most, 15 percent or so.

Q. Okay. And as you can probably guess, I'm going to ask you about -- the same questions for the new District 6, if you could talk about the -- those same features.

A. Sure. Uh-huh.

Well, basically, the Cobb portion is the northeast Cobb, is basically single family housing subdivisions. The Fulton side is the northern part of Sandy Springs, Roswell, Alpharetta, Milton, very

affluent, high-tech area.

And then it takes in all of Forsyth County, all of Dawson County on the Georgia 400 corridor, and then the eastern side of Cherokee County.

Q. Okay. Thank you for that.

And so for the people that were removed from District 6, do you know anything about their racial characteristics?

A. Say on the -- probably on the de -- taking out the DeKalb side was probably a little bit -- reduced the black percentage taking out DeKalb, the DeKalb part. There wasn't much of an African-American percentage in the rest of the district.

Q. In the old District 6, you're saying?

A. In the old one, right. Yes. Uh-huh.

Q. Okay. And what can you say about the racial characteristics of the people that were added in the last redistricting cycle?

A. Well, Dawson County would be heavily white. Forsyth County is heavily white but with a growing Asian population. Eastern Cherokee is pretty heavily white. The Fulton part's probably mixed between white, Asian and Hispanic. And then

the Cobb part would probably be mostly white.
Oh, I'm sorry, and then the Gwinnett portion, there's only, like, five or six precincts there, that's probably more heavily white.
Q. Okay. So during the redistricting process, did anyone ask you about the racial demographics of District 6?
A. Not that I remember, no. Huh-uh.
Q. Not that you remember? But you can't say for sure?
A. I can't say for sure, no. Huh-uh.
Q. And did anyone ask about the black voting age population in the context of congressional maps during the redistricting process?
A. I mean, not that I remember, no.
Q. But same thing, you can't say for sure?
A. I can't say for sure, no. Huh-uh.
Q. And did anyone ask for any other minority voting information when proposals were being discussed?
A. On District 6?
Q. On District 6.
A. I mean, not that I remember, no. Huh-uh.
Q. Okay. Same thing, can't say for sure?
A. Right. Uh-huh.

Q. All right. So now we're going to move on to District 13.
A. Okay.
Q. And we should be uploading Exhibit 11, which will be a map --
A. Right.
Q. -- of a...
(Whereupon, Plaintiff's Exhibit 11 was marked for identification.)
BY MR. MONTOYA-ARMANIOS:
Q. You have it there?
A. Not yet. You mean the 13th district?
Q. That's right.
A. All right.
Q. Yeah.
A. Sorry. Let me hit refresh again. Sorry.
Q. District 13, Exhibit --
A. Okay.
Q. -- 11.
A. Oh, here it is. (Inaudible due to cross-talk).
Q. And you should be seeing two maps here. One on the left, it has a red outline, that's the old District 13. And then the one on the right

should have the black outline. That's the new District 13 after redistricting.

A. Okay. The old is on the left and the new is on the right?

Q. That's right. Yeah.

A. Okay. Yeah, I'm -- okay. I think it's -- I see it, yeah. Uh-huh.

Q. And like before, we can see that there were some areas added; is that right? You can agree with that?

A. Yeah. I'm looking at it right now. Yeah, there were some. I mean, some areas stayed the same, but looked like a few changes, yes. Uh-huh.

Q. And I would direct your attention to the center portion of the map. You can see that there has been some movement there.

A. The center of the left? You mean the right or the left?

Q. As compared between the two maps --

A. Oh, okay.

Q. -- towards the center, yeah.

A. Okay. I'm looking at, yeah, at the new 13th district?

Q. Uh-huh.

A. Yeah. Okay.

Q. And --
A. Uh-huh.
Q. -- if you look at the southern portion, you can see that there's been some areas removed; would you agree with that?
A. The southern portion of the 13th?
Q. Yeah, I'm looking at Fayette here.
A. Oh, okay. I'm sorry. I was looking at -- Henry looks pretty close to the same. Yeah, Fayette looks a little bit different.
Q. Okay. And are you aware whether any of these changes were requested by a specific legislator?
A. No, I don't know. Huh-uh.
Q. You don't remember or -- okay. Okay. You don't remember.
A. I don't know, no. I know -- no. Huh-uh.
Q. Are you aware of any other specific requests as it relates to the boundaries of District 13?
A. No. Huh-uh.
Q. And did you show any legislators any possible changes to District 13 on Maptitude?
A. No. Huh-uh.
Q. You did not?

A. No. Huh-uh.
Q. Okay. And do you remember any other conversations you had during the redistricting process about District 13?
A. No. Huh-uh.
Q. You don't remember or you didn't have any other conversations?
A. I didn't have any as best I know.
Q. Okay. So this was a -- not a whole lot of discussion involved for --
A. Right.
Q. -- producing District 13?
A. Uh-huh. Uh-huh.
Q. The discussion that you did have, can you remember any of the parts of the discussion?
A. No. As I said, I don't remember discussing District 13 period with anybody.
Q. Okay. And can you tell me about the demographic features of the old District 13 the same way you did earlier?
A. Yes. It's a majority African-American district, taking in south Cobb, which has traditionally been Democratic; all of Douglas County, which is basically Democratic.
And then South Fulton, kind of the

northeast part of Fayette County, most of Clayton County in the new map, and then pretty close to the same in Henry County, a little different, but the -- kind of the northern part of Henry County.

Q. And what are the economic features of the former District 13?

A. You mean the socioeconomic?

Q. Yeah.

A. I mean, I don't know offhand in terms of average income. I mean, Fayette County traditionally has been a wealthy area. I think Clayton and Henry traditionally have been more working class, and I think Douglas.

South Cobb's kind of a mixture of upscale housing and maybe more working class housing, but I don't know, like, the average income of the district.

Q. And can you say anything about -- I'm looking at the difference between the two maps again.

A. Yes.

Q. And do you -- you can see the part of Douglas that was removed?

A. Yes, I do.

Q. Can you tell me about that part that was

removed in terms of the socioeconomic features?
A. That part of the county's probably more affluent. It's a little bit more rural. And I think that's the more -- they're -- that's the less Democratic part of Douglas County in terms of party.
Q. The part that was removed, you're saying?
A. Right. Yeah. Because they -- previously you had all of Douglas County. But then the more, looks like the more Republican part of Douglas County was taken out in the new version.
Q. And how about the slices of Cobb that were removed?
A. That would be around Austell and Powder Springs. That would be probably a heavily Democratic area.
Q. The part that was removed, you're saying, was heavily --
A. Right.
Q. -- Democratic?
A. Around southwest Cobb, right. Uh-huh.
Q. Okay. And did anyone ask you about racial demographics -- the racial demographics of District 13? I know you said earlier that you didn't have discussions about District 13, but did anyone ask

you about the racial demographics?
A. Not, I mean, not that I remember, no. Huh-uh.
Q. How about the black voting age population of the district?
A. No. Huh-uh.
Q. You don't remember or they -- no one asked you?
A. No one asked me, as best I know, yeah.
Q. Any other -- did anyone ask you other minority voting information?
A. On the district? No. Huh-uh.
Q. All right. And we're going to move to District 14 --
A. Okay.
Q. -- which should be marked as Exhibit 12.
A. All right. Hold on.
(Whereupon, Plaintiff's Exhibit 12 was marked for identification.)
THE WITNESS: Right here again?
MR. JAUGSTETTER: Just like you did again. Black, the black arrow, you want the black. See it?
THE WITNESS: Oh, okay. Hold on.

Not quite. Okay. There.

MR. JAUGSTETTER: And...

THE WITNESS: Okay. I see dis -- the old and new 14.

BY MR. MONTOYA-ARMANIOS:

Q. Okay. So now we're looking at District 14, the former and the new district. The former district is on the left that's outlined in red. The new district is on the right outlined in black.

A. Yes.

Q. Okay?

All right. And like before, we can see there were areas that were added and areas that were removed from --

A. Correct.

Q. -- District 14.

A. Uh-huh.

Q. And are you aware of any of those changes being requested by a specific legislator?

A. No. Huh-uh.

Q. Okay. How about any requests generally about District 14, Congressional District 14?

A. To change it? No. Huh-uh. No requests.

Q. Did you show any legislators any possible changes to District 14 on Maptitude?

A. No. Huh-uh.
Q. Okay. And do you remember any other conversations you had during the redistricting process about District 14?
A. No. None at all. Huh-uh.
Q. Okay. So can you walk me through for -- actually, let's get -- strike that. Let's get through this line of questioning, and then I'll return.
So can you tell me about the various demographics of the former Congressional District 14?
A. Yes. It's a very heavily white, kind of more working class district, I mean, a lot of textile and carpet mills. Like, Dalton's got a lot of carpet mills. Floyd, Rome is an industrial center and overall pretty red, conservative area.
Q. Okay. And the -- can you talk about the socioeconomic features as well?
A. Of the district? It's more blue collar. It's probably -- it would not be as, like, a highest income in district as, like, say, the sixth district we were just discussing, and you would have lower, like, income levels and education levels.

Q. Okay. And you can see the changes here. In the southwest you can see that there was a large chunk that was taken out. Would you agree with that?

A. You mean that was added to the 14th?

Q. That was -- I'm seeing the southwest part taken out.

A. Oh, you're talk -- oh, on the new? Oh, you mean Haralson County, yes, was taken out, yes.

Q. Can you talk about the features of Harris -- Haralson County?

A. Oh, it's a very Republican county, more blue collar, white working class. We had a former speaker of the house, Tom Murphy, from there years ago.

Q. And that -- those features are pretty opposite to the parts of Cobb that were added; right?

A. Yes, they are. Uh-huh.

Q. Okay. And would you say the same thing about Pickens that you said about Haralson?

A. Yeah. Pickens and Haralson would have similar voting demographic characteristics.

Q. Okay. And I'm trying to understand the process for developing these congressional

districts. It sounds like people weren't asking you for much information about the maps.

Would you say that's accurate?

A. Right. Uh-huh.

Q. So were legislators sending you drafts at all? Did you ever receive drafts from legislators?

A. On the congressional districts? No. Not that I remember. I think Ms. Wright dealt with that more.

Q. Ms. Wright dealt with that. Okay.

A. Yeah. Uh-huh.

Q. All right. So give me one second, please.

All right. So did you ever receive any requests for information about minority populations beyond the three districts that I showed you?

A. For the congressional districts? No.

Q. None at all? Okay.

A. No. Huh-uh.

Q. So I'm going to ask some questions now about Maptitude to understand the program a little bit better.

A. Okay.

Q. So first, when you received the census data from the Census Bureau --

A. Uh-huh.

Q. -- and do you input the data into Maptitude right after you got the data from the Census Bureau?

A. Well, we have a G.I.S. specialist, and I think he basically imports the data into our system.

Q. And then once the data's imported into the system, do you feed Maptitude specific parameters to generate a map?

A. I mean, you could. I didn't -- I wasn't really involved in the specific map drawing last time, but I -- yeah, you could maybe set different parameters on size and things like that, yeah.

I mean, like, you could -- you would set a formula for population of a district, things like that.

Q. So would Maptitude auto-generate a map based off of the parameters you could theoretically feed it?

A. As for -- I mean, I'm not as much an expert as others in the office. I -- could be a possibility. Uh-huh.

Q. Okay. Then -- and it's fine if you don't know. Just let me know.

Do you draw a map, and then Maptitude

fits -- do you draw a map by hand, and then Maptitude then maps that census data onto the lines you've drawn?

A. Well, I mean, typically, you know, you have a mouse and you can just add, you know, census blocks and precincts to districts. That's basically the way it operates.

Q. Okay. And you're not sure if that's how the map drawing process began in this redistricting cycle, with a hand-drawn map as opposed to an auto-generated app -- map?

A. No, I don't know for sure. No. Huh-uh.

Q. Okay. And so now I'm going to ask about when you have conversations with individual members what the Maptitude process looks like.

And so when a member meets with you, they might say something like, I want to move this line a little bit this way or that way; right? Is that kind of generally --

A. That's fine. Yeah, that's the general idea.

Q. Okay. And then you would move the lines live for them to see what it would look like and then how it would change the data?

A. Right. Then you would hit a "check" and

it would make the change. Like, you would -- it would show up, like, you know, a shade of something, then you'd click "check" and then it makes the change.

Q. And then when you make the change, is that the action that generates a new draft that goes into the member's folder?

A. Right. Well, you would -- you could -- you would -- you would save it and, you know, give it a name, yes.

Q. Okay. So you would make a change based off of the suggestion, and then --

A. Uh-huh.

Q. -- you would manually save that new map --

A. In the --

Q. -- into the --

A. -- to the --

Q. -- members' --

A. -- members' folder, right. Uh-huh.

Q. Did you ever make changes without saving the new map draft?

A. What, on the -- on the congressional?

Q. Yeah. Well, I -- let's ask for both. So we'll start with congressional.

A. No. I mean, I wasn't really involved in

the congressional maps.

Q. Okay. And so for the house, the state house and state senate maps, did you ever --

A. Say the question again, did I ever what?

Q. The question is, did -- were there ever any instances where you changed a map and didn't save that draft during these meetings?

A. No. Huh-uh.

Q. Okay. So that the whole universe of created maps should be in those members' folders?

A. Correct. Uh-huh.

Q. Okay. And then what happens with those draft maps?

Because now at this point you must have dozens of them; right?

A. Yeah, you could. I mean, it's -- there's some formatting, this is a little bit hard to explain, where you can try to incorporate, you know, different maps and fit it in the system.

Q. And so did you have a process for negotiating the difference between those draft maps, the ones that conflicted?

A. They -- my director was more involved in that, Gina Wright, so I don't -- I don't know the specific process on that in terms of how that was

resolved.

Q. So she wouldn't do that in front of you, that was done --

A. Right. I wasn't --

Q. -- right away?

A. I wasn't present when that was done, no. Huh-uh.

Q. Okay. Give me just one second.

Okay. So now I'm going to move to a new exhibit --

A. Uh-huh.

Q. -- which should be marked Exhibit 13. Let me make sure it's there.

(Whereupon, Plaintiff's Exhibit 13 was marked for identification.)

BY MR. MONTOYA-ARMANIOS:

Q. And let me know when you see it.

A. Uh-huh.

(Whereupon, the document was reviewed by the witness.)

THE WITNESS: I see it. I'm reading it right now.

BY MR. MONTOYA-ARMANIOS:

Q. Great.

So you should be looking at an E-mail exchange. The Bates stamp is LEGIS 00015778. It's from Rob Strangia, from April 30th, 2020, sent at 7:02 p.m. to Gina Wright, Brian Knight and Dan O'Connor. The subject line is Differential Privacy City (Census Place) Report.

A. Right.

Q. And the language says:

[As read] "Attached is the city (census place) report. The attributes are the same as the previous county report. I think you will find this 'interesting.'

"After taking a quick look at the racial data for some of the smaller cities, I saw some large discrepancies. Just look at Hispanic for Blue Ridge. I'm glad that you are finding this data 'useful.'"

So I don't see a -- well, first, will you represent that that's what you're seeing as well?

A. Yes. The paragraph, yes.

Q. Great.

I don't see any sort of other E-mails attached to this exchange. Do you remember this

E-mail exchange?

A. No, I don't.

Q. You don't. Do you know what he might mean about the attachment being the city census place report?

A. I don't remember if I -- I think it had something to do with, you know, something about differential I think privacy. And it's a little bit complex for me to explain.

But I think it had something to do with what do you do when you have, like, census blocks if there's only, like, one person and, yeah, you might lose your privacy, you know, if you have one person in a district, something like that.

So I -- but you'd have to ask him. I don't -- I didn't generate the report.

Q. Okay. So you -- okay. So try to help me understand. If it is what you think it is, what is the discrepancy that could be here if you think it's about this individual census report?

A. It's possible there might be maybe some blocks where the data may not be accurate.

Q. And do you know what the -- accurate as compared to what other data set?

A. It could be compared to the 2010 census

data. But again, I can't say for sure. I didn't do the report.

Q. Okay. And do you know what he could have meant when he asked if -- where he said to Gina that this seemed interesting?

A. Maybe referring to the discrepancies.

Q. And what do you think he meant when he said "I'm glad that you're finding this data 'useful'" in quotes?

A. I don't know.

Q. Okay. So if it's all right, I want to take just a short break, let's say -- let's say five minutes if that's all right.

A. Okay.

MR. MONTOYA-ARMANIOS: Okay.

THE VIDEOGRAPHER: The time is --

MR. MONTOYA-ARMANIOS-ARMANIOS: So --

THE VIDEOGRAPHER: I'm sorry. Go ahead.

MR. MONTOYA-ARMANIOS: No. I was just going to say we can go off the record. Thank you.

THE VIDEOGRAPHER: The time is 12:13. We're off the record.

(Whereupon, a discussion ensued

off the record.)

(Whereupon, there was a brief recess.)

THE VIDEOGRAPHER: The time is 12:17. We're back on the record.

MR. MONTOYA-ARMANIOS: Okay. Thank you.

BY MR. MONTOYA-ARMANIOS:

Q. Mr. O'Connor, I have just one more question, or two more questions left for you.

So you testified earlier that, when a member is having a conversation with you about the maps and you make changes, those draft changes are saved in member files.

A. Right. Uh-huh.

Q. And so when you talk to a member about the congressional districts, is there a member file for the Congress member?

A. That could be under the respective house and senate redistricting chairman, but I'm not sure. Or it could be from a legislator in their district.

Q. When you say "it could be," what do you mean? When you said "it could be," can you rephrase that?

A. Well, in terms of a congressional proposal, it could possibly be in a legislator's folder, like, if they were proposing a congressional district for their area.

Q. Okay. So sometimes state legislators suggested changes to the congressional map?

A. They could sometimes do that. Or it could be in the chairman of the house and senate reapportionment committee's maybe could have some in theirs, since they would be the chairman.

Q. Okay. And if they did, if any of them did, those drafts would have been saved in their individual --

A. (Inaudible due to cross-talk).

Q. -- folders?

A. Right. Uh-huh.

Q. Okay. And did any Congress members, U.S. Congress members talk to your office about the redistricting process?

A. I mean, I don't -- I don't remember talking to them. I can't say if they talked to others in the office.

Q. Okay. How about any staff members of any congressional representatives, did they talk to your office?

A. I don't remember talking to any staff, but they could have possibly talked to others in the office.

Q. Okay. And my last question is, were there any conversations you had about the congressional districts, period, during the redistricting process?

A. Any converse -- I mean, there could have been. I don't know.

Q. Okay. Because I've heard mostly today that your involvement was only on the state level maps.

A. It was mainly -- right. Uh-huh.

Q. Okay. But there may have been some instances where you discussed the congressional maps, you just can't remember?

A. Yeah. I mean, in terms of a meeting with a legislator, no, there wasn't. Huh-uh.

Q. There wasn't any you -- discussions about the congressional maps you had with a legislator --

A. Right.

Q. -- you said?

A. Right. Yes.

Q. Okay.

MR. MONTOYA-ARMANIOS: So that is all

I have for you. So I think we're good to end it there, unless anyone else has other questions they wanted to ask.

MR. ROLLINS-BOYD: All right. If there are no questions from Patrick or Mr. Tyson, then we are done for today.

MR. JAUGSTETTER: Nothing from us. Thank y'all.

THE VIDEOGRAPHER: This concludes the videotaped deposition. The time is 12:21. We are off the record.

(Whereupon, a discussion ensued off the record.)

(Whereupon, the reading and signing of the deposition by the witness was reserved.)

- - -

(Witness excused.)

- - -

(Whereupon, the deposition concluded at 12:21 p.m.)

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R E P O R T E R C E R T I F I C A T E

STATE OF GEORGIA)
COBB COUNTY)

I, Debra M. Druzisky, a Certified Court Reporter in and for the State of Georgia, do hereby certify:

That prior to being examined, the witness named in the foregoing deposition was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That said deposition was taken before me at the time and place set forth and was taken down by me in shorthand and thereafter reduced to computerized transcription under my direction and supervision. And I hereby certify the foregoing deposition is a full, true and correct transcript of my shorthand notes so taken.

Review of the transcript was requested. If requested, any changes made by the deponent and provided to the reporter during the period allowed are appended hereto.

I further certify that I am not of kin or counsel to the parties in the case, and I am not in the regular employ of counsel for any of the said parties, nor am I in any way financially interested in the result of said case.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 31st day of March, 2023.

Debra M. Druzisky
Georgia CCR-B-1848

ERRATA FOR ASSIGNMENT # 5806351

I, the undersigned, do hereby certify that I have read the transcript of my testimony, and that

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DEPONENT'S SIGNATURE

Sworn to and subscribed before me this _____ day of
_____, 2023.
_____
NOTARY PUBLIC
My Commission Expires: _____.
_____ Notary Public

R E P O R T E R D I S C L O S U R E

DISTRICT COURT)
NORTHERN DISTRICT)
ATLANTA DIVISION)

DEPOSITION OF
DANIEL J. O'CONNOR, III

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Debra M. Druzisky
Georgia CCR-B-1848

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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From: O'Connor, Dan </O=GEORGIA GENERAL ASSEMBLY/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=DAN.O'CONNOR>
Sent: Friday, February 27, 2015 2:16 PM
To: janjones38@bellsouth.net
Subject: Follow-Up, State House Districts
Attach: House Dist--Oct 14 VReg J Jones.xlsx; House 12 Re--2014 Voting Data J Jones.xlsx; House 12 Re--2012 President Maptitude.xlsx

---

Hi Madame Pro Tem:

Following up from yesterday, I have attached data concerning the House districts of Reps. Chandler (105), Strickland (111), Cheokas (138) and Greene (151)---voter registration by counties for their respective districts and voting in various statewide contests for those districts from last fall. Some highlights:

---Of the 4 districts, only one (138-Cheokas) has a white majority as pertains to voter registration (his district is 52% white in voter registration). Rep, Chandler's district is 47% white, Strickland's 48% and Greene's 44%. All 4 members represent districts that are at least 35% black in voter registration (Greene's district is majority black, 53%, in voter registration). Generally, once a district gets in the 30-35% black range, it becomes more of a target for Democrats.

--3 of the districts (all but HD 138) backed Nunn and Carter in last fall's elections. Rep. Cheokas's district split in the two races---in the Senate race, Perdue won his district by 65 votes, while Carter won here by 324 votes (a fairly weak showing for Carter given Sumter County of course is home of the ex-president). However, 3 of the districts (all but Greene's) also voted Republican in the statewide contests for lieutenant governor, secretary of state and attorney general. (Greene's district favored Cagle over Stokes by a mere 5 votes in the contest for lieutenant governor but voted Democratic for secretary of state and attorney general).

---3 of the 4 districts backed Obama in 2012 (HD 105---51%; HD 111---49.6% and HD 151---55.9%). HD 138 favored Obama over Romney by just 6 votes. HD 151 gave Obama 56 percent of the vote.

---All 60 seats in the House now held by Democrats backed Obama in 2012.

Let me know if any questions or follow-up.

Thanks,
Dan O'Connor

EXHIBIT
3

PLAINTIFF'S EXHIBIT
123
Chandler
1/24/18

Message

From: Dudgeon, Mike [Mike.Dudgeon@ltgov.ga.gov]
Sent: 6/25/2019 5:50:59 PM
To: O'Connor, Dan [Dan.O'Connor@legis.ga.gov]
Subject: RE: Request

I was a brand new freshman in 2011 and went through that whole crazy August session. Even though I had almost no say, it was still fascinating.

I imagine this year with the purple-ization of GA the craziness will be ever higher.

-Mike

From: O'Connor, Dan <Dan.O'Connor@legis.ga.gov>
Sent: Tuesday, June 25, 2019 1:45 PM
To: Dudgeon, Mike <Mike.Dudgeon@ltgov.ga.gov>
Subject: RE: Request

Mike, yes, we basically have to wait until 2021 to get the redistricting process going. While the census officially is next April, it takes about a year to get the data broken down to the "micro" level---county, city, district and the like. By the end of next year, we should have a statewide count, showing Georgia's total statewide population, and then by the following April 1, the data broken down at the level where we can redistrict. Thus, we have one more election cycle (2020) under the current lines, and the 2022 election cycle would be the first one where we have districts based on 2020 census figures.

I have been through one "regular" redistricting cycle here (2011-2012, following the 2010 census), and last time as I recall, data was released at the "micro" level toward the end of the 2011 regular legislative session, such as the population of the then-existing congressional and state legislative districts. After the session (spring of 2011), the House and Senate Redistricting committees held joint hearings around the state to gather public input, and during spring and into summer of that year, our office worked with legislators to redraw the State House and Senate maps (late also, a congressional map). Then a special session was called for latter part of summer (August) to redraw the state legislative and congressional districts, along with adopting any local redistricting plans (our office also assists with local redistricting, like county commission and school board districts). Preclearance (as then was required under Voting Rights Act) was obtained around Christmas of 2011 and the then-new maps took effect with the 2012 state primary.

No trouble to check further---Census bureau releases lots of data (though sometimes hard to find on their website). If I happen across anything I'll let you know. Maybe can get lunch sometime and discuss further.

Thanks, Dan

From: Dudgeon, Mike
Sent: Tuesday, June 25, 2019 1:05 PM
To: O'Connor, Dan
Subject: RE: Request

Thanks Dan! This was more of a curiosity than a legit question, so its not worth a lot of effort.

But it brings something interesting up – when can your office even start to look at any maps for 2021 redistricting? Do you have to wait until census gets you data in late 2020 / early 2021? I thought they released their "estimates" or whatever they do

-Mike

From: O'Connor, Dan <Dan.O'Connor@legis.ga.gov>
Sent: Tuesday, June 25, 2019 11:18 AM
To: Dudgeon, Mike <Mike.Dudgeon@ltgov.ga.gov>
Subject: RE: Request

HI Mike:

Good to hear from you. Yes, I saw that article and read it with interest, but unfortunately our office does not have any updated data/estimates in terms of population or demographics for the state legislative districts (that is, anything beyond the 2010 census data, which of course by now is 9 years old). Sometimes I have seen updates of congressional district population estimates from the Census Bureau, but I guess it would be an extremely challenging task to do so for the 7,000+ state legislative districts across the United States!

However, Secretary of State/elections should have breakdowns in terms of voter registration by state legislative district, as to the total for each district and number of blacks, whites, Asians and so on who are in each district (again, just in terms of voter registration). That could provide at least a rough estimate of the Asian percentage by district. (I emphasize "rough" as a lot of Georgians do not register by race---put down their race when they register---still a lot of voters in the "others" category on SOS lists.) SOS also produces a "Credit for Voting" report after each state election showing the number of people by race who voted---showing last November that 3.9+ million Georgians voted (in Forsyth, the total turnout was close to 94,000, with about 5 percent of that being Asian—keeping in mind again though that some voters don't list their race when they register, so the actual Asian turnout in the county probably was higher than the roughly 4,600 Asians SOS reported for the county last November). SOS reported about 8,000 active registered Asians in Forsyth for last November's general election, equal to about 6 percent of the county's total registered voters.

Forsyth County's population growth certainly has been reflected with increases in voter turnout. 15 years ago, in the 2004 presidential election, the county ranked 12th among the 159 Georgia counties in total turnout. In last November's general election, the county ranked 8th among the 159 counties, having since 2004 passed Bibb (Macon), Clayton, Muscogee (Columbus) and Richmond (Augusta). Fulton of course has been the state's largest voting county for generations, with Gwinnett now having overtaken Cobb and DeKalb for second (DeKalb was third and Cobb fourth among the 159 counties in total turnout for governor last year), with Cherokee 5th, Chatham (Savannah) 6th and Henry 7th, followed again by Forsyth in 8th place.

If I find anything more, I will let you know, and in meanwhile, if I can be of further help (such as any map requests, like a statewide map showing counties), let me know.

Thanks,
Dan O'Connor
Reapportionment Office
(404) 656-5063

From: Dudgeon, Mike
Sent: Monday, June 24, 2019 5:23 PM

To: O'Connor, Dan
Subject: Request

Dan

Hope you are doing well. There was an interesting article in the AJC about 1 in 7 citizens in Forsyth County now being Asian demographic.

Do you have access to the data that would let you break that down by House District (Forsyth County only is fine)

-Mike

Mike Dudgeon
Director of Policy
Office of Lt. Governor Geoff Duncan
240 State Capitol, Atlanta, GA 30334
(404) 656-5030

Message

From: O'Connor, Dan [/O=GEORGIA GENERAL ASSEMBLY/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=DAN.O'CONNOR]
Sent: 11/5/2019 4:14:47 PM
To: Dave belton [davebelton112@gmail.com]
Subject: RE: 112

Hi Rep. Belton:

Good to hear from you----we don't have any 2019 population estimates for the district, either in whole or in part (in part being the Newton County portion), but the next best thing might be for me to check 2018 voter registration data for the district (which we would have from last year's regular election cycle), and I can break that down for the Newton part. The 2010 census data is "pretty old" at this stage, but for comparison purposes, at that time, your district was 23% black overall in population and 3% Hispanic (data for whole district, not just the Newton portion).

In terms of salary data (or other socioeconomic data such as education level and housing values), our office software does not have any such data but I do know a website that has some estimates from a few years ago, and I will check that to see what I can find in terms of average income.

Also FYI, while the census is next April, we won't have 2020 census data at the "micro" level (like county or district level) til either late winter or early spring of 2021, so we have one more cycle (202) under the current lines before we need to make changes in 2021 and/or 2022 for the 2022 election cycle.

Thanks, Dan

From: Dave belton [mailto:davebelton112@gmail.com]
Sent: Tuesday, November 05, 2019 10:32 AM
To: O'Connor, Dan
Subject: 112

Dan, can you get a few numbers for me, please.

The ratio of race inside Newton County

The ratio of race within District 112 as a whole.

The average salary of District 112 now and when Governor Deal came into office.

Thank you!

Blue Skies,

Chairman Dave Belton
Georgia House of Representatives
Captain, Delta Air Lines
Lt. Commander, United States Navy (retired)

"America is too Great for small Dreams"

- Ronald Reagan

Message

From: O'Connor, Dan [/O=GEORGIA GENERAL ASSEMBLY/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=DAN.O'CONNOR]
Sent: 6/21/2019 2:59:45 PM
To: rdwashburn@gmail.com
Subject: House District 143
Attachments: House12re - HD 143.pdf

Rep. Washburn, attached is PDF with map of House District 143 (James Beverly). His district includes roughly the northeast corner of Macon, including the area around the coliseum, the I-16 corridor from 75 to the Twiggs County line, the downtown area/Mercer. It reaches west into the Vineville area (Pierce Avenue corridor) along Hwy. 41 over to Forrest hill Road, Wimbish Road and to Northside Drive off of 75.

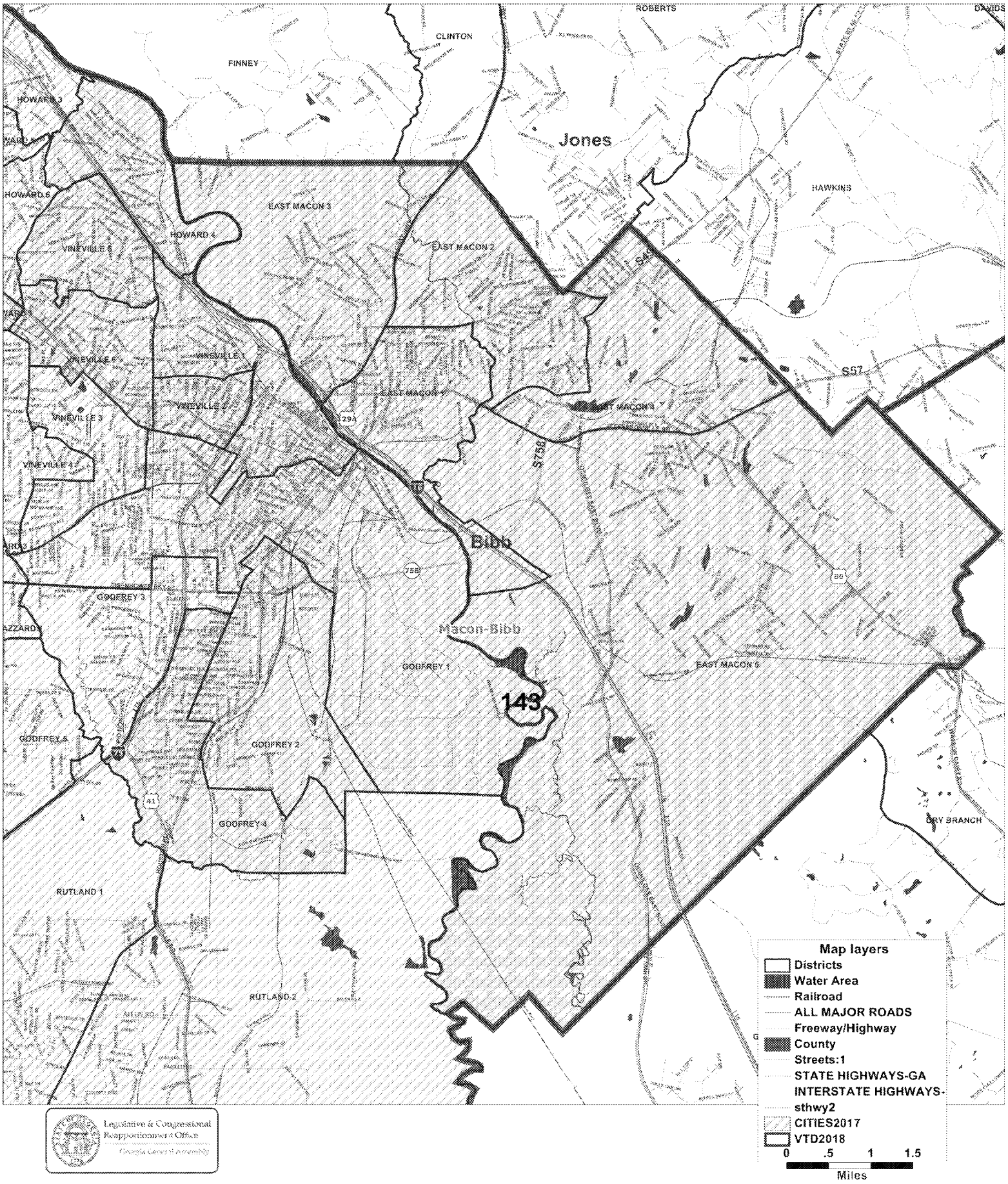
This district had about 36,000 registered voters in the 2018 election cycle, of whom 59 percent were black. In the 2016 presidential election, the district gave Clinton 74 percent and Trump 25 percent, while in last year's contest for governor, Abrams got 75 percent in this district, Kemp 24 percent.

If I can be of further help or further clarification needed on these districts, please let me know---will be in office all next week.

Thanks,
Dan O'Connor
Reapportionment Office
Georgia General Assembly
(404) 656-5063

Client: State
Plan: House12re
Type: House

House District 143---Effective 2012



Message

Sent: 6/18/2020 2:09:14 PM
To: Wright, Sheena [Sheena.Wright@house.ga.gov]
CC: Wright, Gina [Gina.Wright@legis.ga.gov]
Subject: RE: Pro Tem Request
Attachments: House15-PACKET.pdf

H Sheena:

Per your request, attached is a report with the black VAP for all 180 State House districts. The VAP population and percentage are listed on the second line for each district; for example, for House District 1 of the report, the

---

From: Wright, Sheena
Sent: Thursday, June 18, 2020 9:53 AM
To: O'Connor, Dan <Dan.O'Connor@legis.ga.gov>
Subject: Pro Tem Request

Hi Dan,

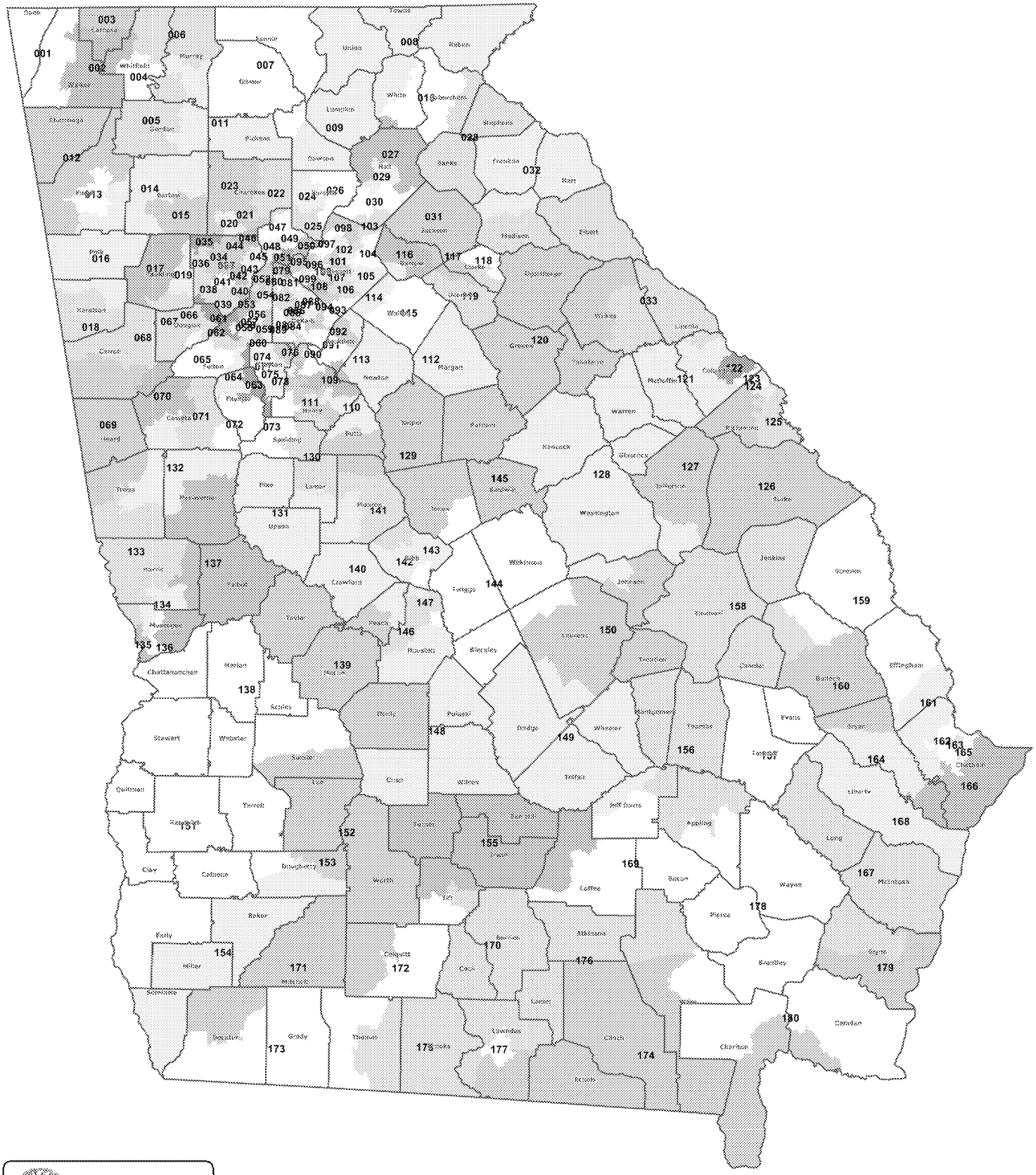
Speaker Pro Tem is asking for the black VAP for all house districts. Can you send that to me?

Thank you!

Sheena D. Wright
Executive Assistant
Office of the Speaker Pro Tem
Georgia House of Representatives
340 State Capitol
Atlanta, GA 30334
404-656-5072 phone
sheena.wright@house.ga.gov

Client: State
Plan: House15
Type: House

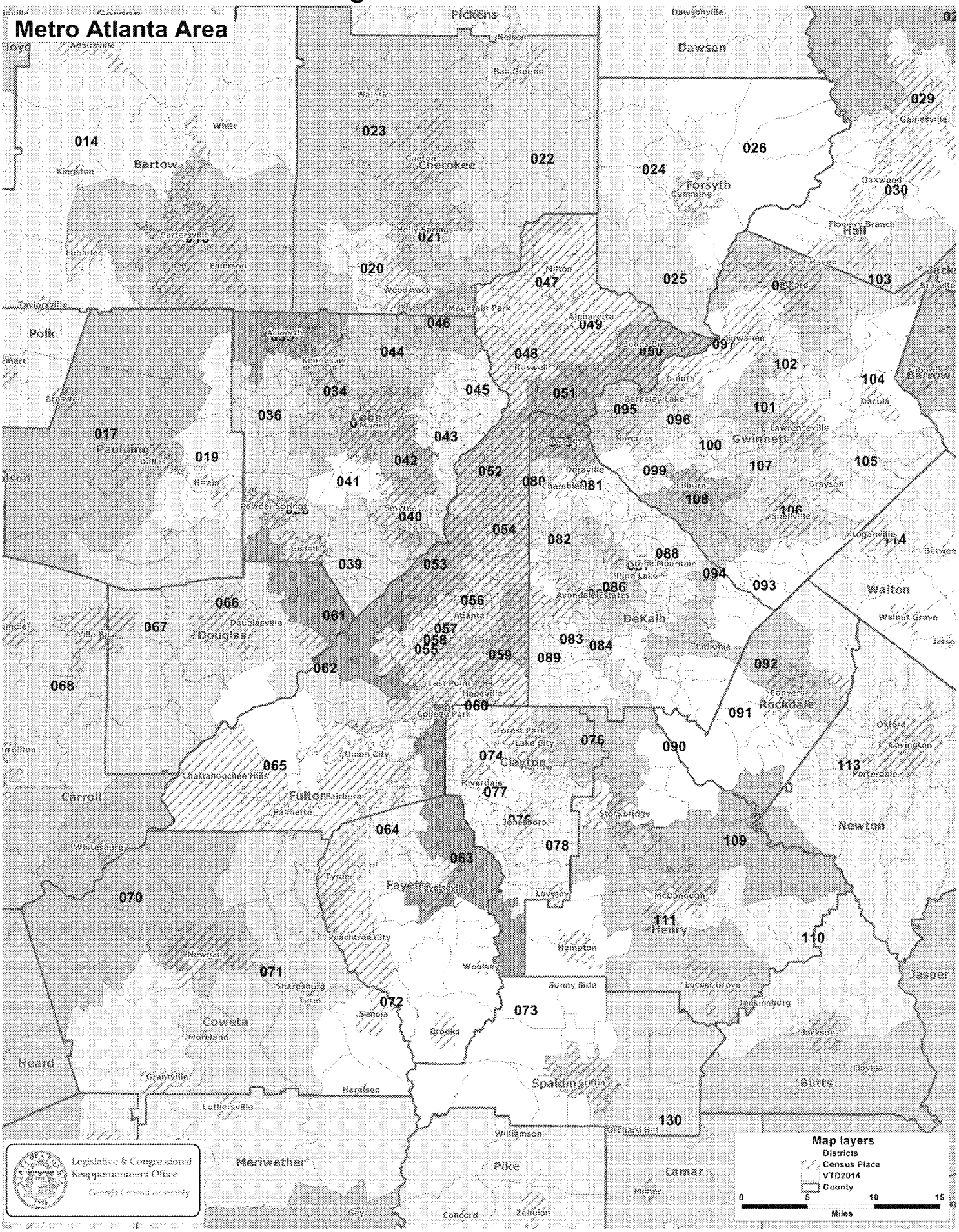
Georgia House Districts- 2015



Legislative & Congressional Reapportionment Office
Georgia General Assembly

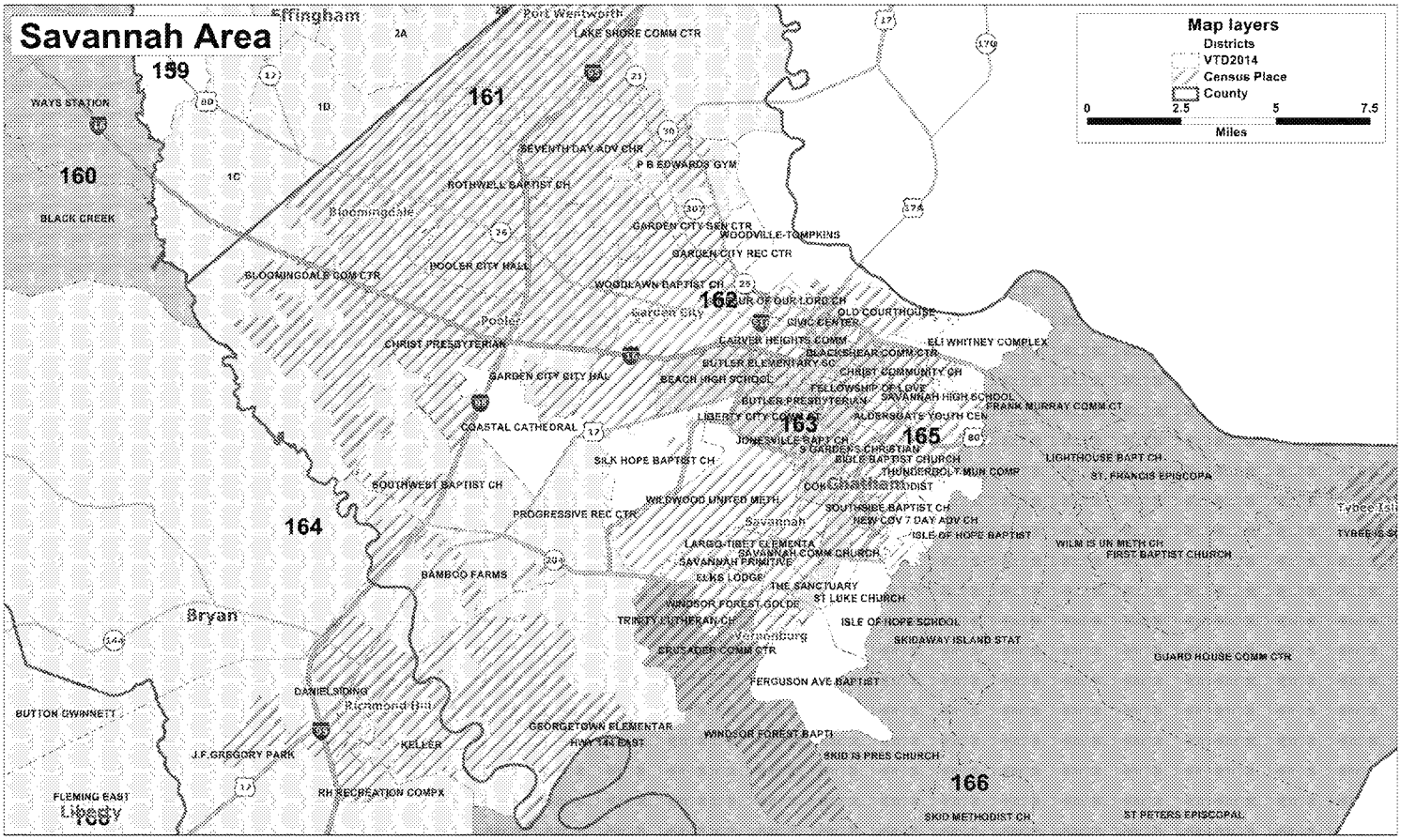
Client: State
Plan: House15
Type: House

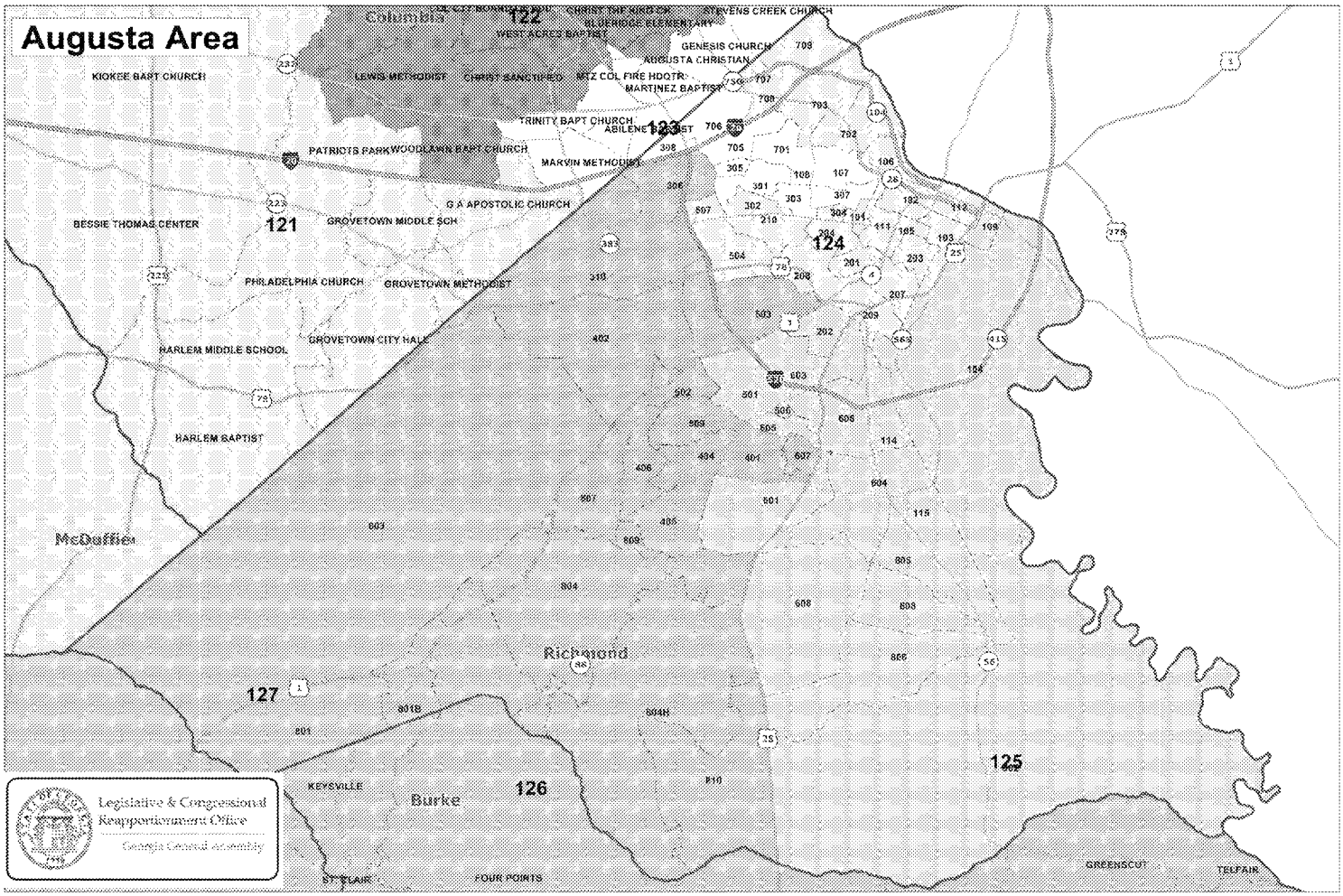
Georgia House Districts- 2015



Client: State
Plan: House15
Type: House

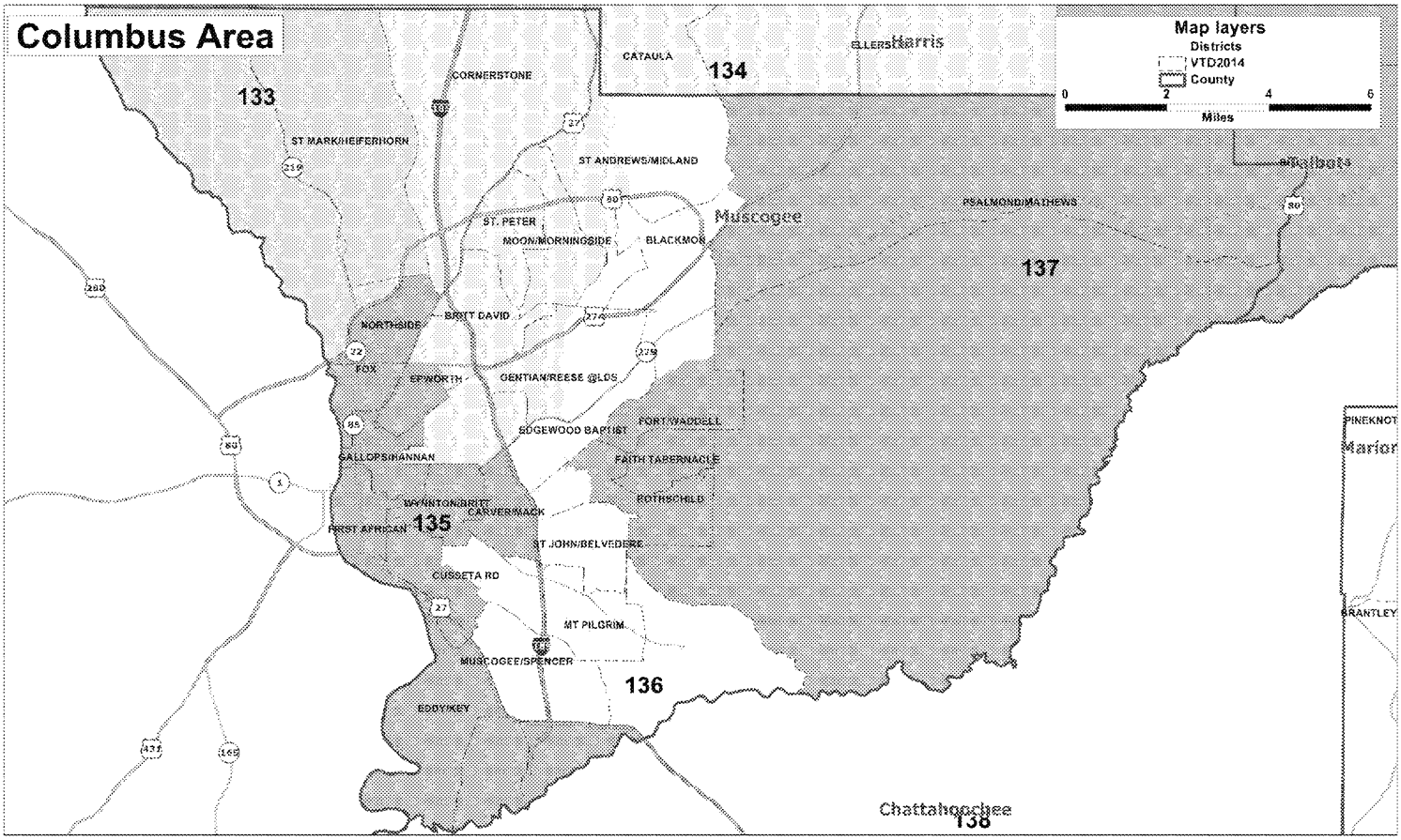
Georgia House Districts- 2015

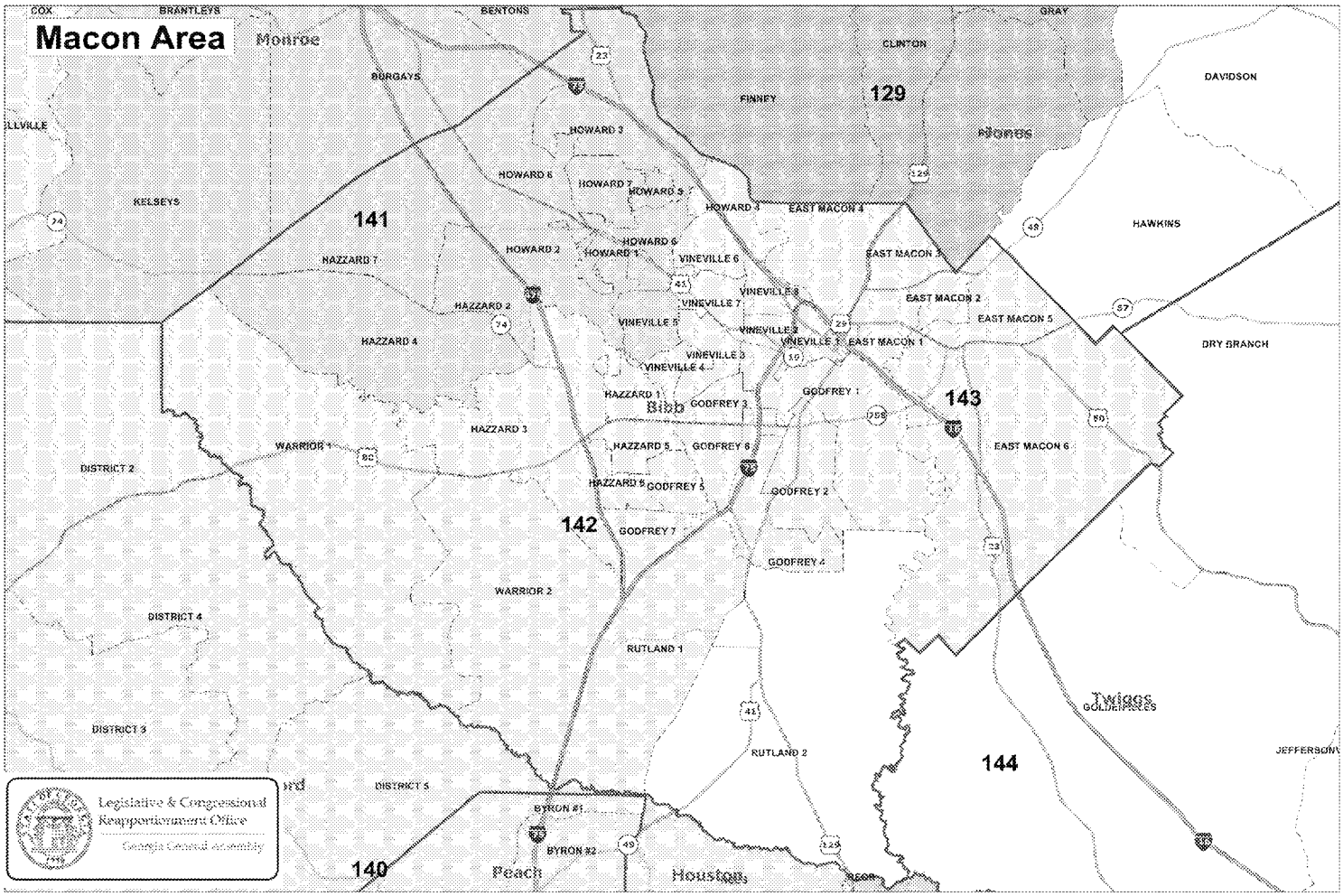




Client: State
Plan: House15
Type: House

Georgia House Districts- 2015





Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
001		53,612	-208	-0.39%	1,535	2.86%	262	1,797	3.35%	908	1.69%
	VAP	41,298			1,115	2.70%	51	1,166	2.82%	539	1.31%
002		53,910	90	0.17%	1,946	3.61%	365	2,311	4.29%	1,772	3.29%
	VAP	40,653			1,515	3.73%	68	1,583	3.89%	1,029	2.53%
003		53,366	-454	-0.84%	1,233	2.31%	356	1,589	2.98%	1,231	2.31%
	VAP	40,240			837	2.08%	78	915	2.27%	739	1.84%
004		54,120	300	0.56%	2,526	4.67%	371	2,897	5.35%	22,063	40.77%
	VAP	38,389			1,959	5.10%	108	2,067	5.38%	12,869	33.52%
005		53,589	-231	-0.43%	1,907	3.56%	378	2,285	4.26%	7,921	14.78%
	VAP	38,998			1,439	3.69%	114	1,553	3.98%	4,695	12.04%
006		53,968	148	0.27%	1,079	2.00%	302	1,381	2.56%	11,676	21.64%
	VAP	38,578			732	1.90%	80	812	2.10%	6,563	17.01%
007		54,058	238	0.44%	220	0.41%	109	329	0.61%	3,141	5.81%
	VAP	43,050			145	0.34%	35	180	0.42%	1,876	4.36%
008		53,905	85	0.16%	341	0.63%	102	443	0.82%	2,111	3.92%
	VAP	43,921			225	0.51%	38	263	0.60%	1,367	3.11%
009		54,289	469	0.87%	484	0.89%	229	713	1.31%	2,405	4.43%
	VAP	41,849			385	0.92%	77	462	1.10%	1,538	3.68%
010		53,428	-392	-0.73%	1,709	3.20%	276	1,985	3.72%	5,147	9.63%
	VAP	40,720			1,451	3.56%	59	1,510	3.71%	2,880	7.07%
011		53,610	-210	-0.39%	547	1.02%	182	729	1.36%	3,485	6.50%
	VAP	40,794			397	0.97%	37	434	1.06%	1,979	4.85%
012		54,317	497	0.92%	4,835	8.90%	401	5,236	9.64%	3,021	5.56%
	VAP	41,793			3,800	9.09%	93	3,893	9.31%	1,792	4.29%
013		53,445	-375	-0.70%	10,927	20.45%	530	11,457	21.44%	6,711	12.56%
	VAP	40,153			7,827	19.49%	148	7,975	19.86%	4,030	10.04%
014		53,527	-293	-0.54%	3,436	6.42%	324	3,760	7.02%	2,658	4.97%
	VAP	39,442			2,482	6.29%	74	2,556	6.48%	1,530	3.88%
015		53,473	-347	-0.64%	6,982	13.06%	515	7,497	14.02%	4,980	9.31%
	VAP	39,649			4,875	12.30%	114	4,989	12.58%	2,965	7.48%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
016		53,926	106	0.20%	5,762	10.69%	421	6,183	11.47%	5,275	9.78%
	VAP	39,416			4,022	10.20%	76	4,098	10.40%	2,989	7.58%
017		54,036	216	0.40%	7,427	13.74%	625	8,052	14.90%	2,553	4.72%
	VAP	37,564			4,737	12.61%	204	4,941	13.15%	1,447	3.85%
018		53,682	-138	-0.26%	8,806	16.40%	661	9,467	17.64%	3,420	6.37%
	VAP	40,084			6,453	16.10%	175	6,628	16.54%	2,178	5.43%
019		54,164	344	0.64%	9,875	18.23%	678	10,553	19.48%	3,119	5.76%
	VAP	38,287			6,514	17.01%	219	6,733	17.59%	1,858	4.85%
020		53,679	-141	-0.26%	3,952	7.36%	515	4,467	8.32%	4,742	8.83%
	VAP	38,519			2,661	6.91%	171	2,832	7.35%	2,952	7.66%
021		54,040	220	0.41%	2,842	5.26%	407	3,249	6.01%	5,000	9.25%
	VAP	38,275			1,851	4.84%	118	1,969	5.14%	3,078	8.04%
022		54,090	270	0.50%	1,937	3.58%	304	2,241	4.14%	4,320	7.99%
	VAP	38,675			1,318	3.41%	116	1,434	3.71%	2,747	7.10%
023		53,852	32	0.06%	3,248	6.03%	470	3,718	6.90%	7,412	13.76%
	VAP	39,892			2,195	5.50%	150	2,345	5.88%	4,660	11.68%
024		54,284	464	0.86%	1,329	2.45%	249	1,578	2.91%	6,376	11.75%
	VAP	38,393			884	2.30%	85	969	2.52%	4,020	10.47%
025		54,157	337	0.63%	1,888	3.49%	257	2,145	3.96%	3,338	6.16%
	VAP	35,375			1,247	3.53%	92	1,339	3.79%	2,066	5.84%
026		54,311	491	0.91%	910	1.68%	206	1,116	2.05%	4,267	7.86%
	VAP	38,827			608	1.57%	63	671	1.73%	2,632	6.78%
027		53,326	-494	-0.92%	1,741	3.26%	293	2,034	3.81%	7,710	14.46%
	VAP	39,263			1,254	3.19%	62	1,316	3.35%	4,404	11.22%
028		53,438	-382	-0.71%	3,399	6.36%	387	3,786	7.08%	2,351	4.40%
	VAP	40,671			2,532	6.23%	72	2,604	6.40%	1,370	3.37%
029		53,527	-293	-0.54%	6,698	12.51%	421	7,119	13.30%	23,417	43.75%
	VAP	37,452			4,682	12.50%	145	4,827	12.89%	13,600	36.31%
030		53,787	-33	-0.06%	3,993	7.42%	317	4,310	8.01%	13,870	25.79%
	VAP	39,178			2,920	7.45%	97	3,017	7.70%	8,081	20.63%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
031		53,585	-235	-0.44%	3,447	6.43%	387	3,834	7.15%	3,171	5.92%
	VAP	39,241			2,497	6.36%	99	2,596	6.62%	1,929	4.92%
032		54,017	197	0.37%	6,708	12.42%	399	7,107	13.16%	1,802	3.34%
	VAP	41,866			4,949	11.82%	82	5,031	12.02%	1,117	2.67%
033		53,537	-283	-0.53%	11,492	21.47%	272	11,764	21.97%	2,153	4.02%
	VAP	41,192			8,525	20.70%	94	8,619	20.92%	1,275	3.10%
034		54,162	342	0.64%	9,819	18.13%	697	10,516	19.42%	4,900	9.05%
	VAP	41,682			6,949	16.67%	317	7,266	17.43%	3,186	7.64%
035		53,394	-426	-0.79%	11,690	21.89%	730	12,420	23.26%	5,164	9.67%
	VAP	37,954			7,649	20.15%	268	7,917	20.86%	3,263	8.60%
036		54,192	372	0.69%	6,790	12.53%	357	7,147	13.19%	2,318	4.28%
	VAP	37,923			4,407	11.62%	133	4,540	11.97%	1,410	3.72%
037		54,233	413	0.77%	11,949	22.03%	700	12,649	23.32%	9,293	17.14%
	VAP	40,849			8,494	20.79%	319	8,813	21.57%	5,939	14.54%
038		53,921	101	0.19%	24,203	44.89%	981	25,184	46.71%	6,021	11.17%
	VAP	39,397			16,271	41.30%	406	16,677	42.33%	3,615	9.18%
039		54,192	372	0.69%	28,547	52.68%	924	29,471	54.38%	10,021	18.49%
	VAP	38,182			19,598	51.33%	409	20,007	52.40%	6,010	15.74%
040		53,978	158	0.29%	11,978	22.19%	684	12,662	23.46%	3,223	5.97%
	VAP	43,428			8,956	20.62%	340	9,296	21.41%	2,256	5.19%
041		54,148	328	0.61%	19,890	36.73%	1,013	20,903	38.60%	16,357	30.21%
	VAP	38,676			13,816	35.72%	472	14,288	36.94%	9,798	25.33%
042		53,894	74	0.14%	21,005	38.97%	1,198	22,203	41.20%	14,955	27.75%
	VAP	40,861			15,784	38.63%	609	16,393	40.12%	9,487	23.22%
043		53,969	149	0.28%	8,238	15.26%	525	8,763	16.24%	3,174	5.88%
	VAP	42,593			6,228	14.62%	280	6,508	15.28%	2,300	5.40%
044		53,480	-340	-0.63%	6,539	12.23%	575	7,114	13.30%	4,140	7.74%
	VAP	40,695			4,636	11.39%	216	4,852	11.92%	2,721	6.69%
045		53,969	149	0.28%	4,550	8.43%	355	4,905	9.09%	2,460	4.56%
	VAP	40,117			3,547	8.84%	170	3,717	9.27%	1,647	4.11%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
046		53,712	-108	-0.20%	3,695	6.88%	489	4,184	7.79%	4,126	7.68%
	VAP	39,868			2,628	6.59%	175	2,803	7.03%	2,715	6.81%
047		54,102	282	0.52%	4,362	8.06%	473	4,835	8.94%	2,934	5.42%
	VAP	38,241			2,977	7.78%	189	3,166	8.28%	1,933	5.05%
048		53,832	12	0.02%	6,997	13.00%	585	7,582	14.08%	13,049	24.24%
	VAP	40,207			4,882	12.14%	277	5,159	12.83%	8,433	20.97%
049		53,609	-211	-0.39%	5,368	10.01%	473	5,841	10.90%	3,993	7.45%
	VAP	38,077			3,781	9.93%	197	3,978	10.45%	2,552	6.70%
050		53,486	-334	-0.62%	5,240	9.80%	459	5,699	10.66%	2,773	5.18%
	VAP	36,917			3,406	9.23%	171	3,577	9.69%	1,768	4.79%
051		53,630	-190	-0.35%	11,461	21.37%	816	12,277	22.89%	5,150	9.60%
	VAP	41,035			8,478	20.66%	412	8,890	21.66%	3,437	8.38%
052		53,458	-362	-0.67%	6,576	12.30%	576	7,152	13.38%	8,262	15.46%
	VAP	41,106			5,215	12.69%	326	5,541	13.48%	5,325	12.95%
053		53,497	-323	-0.60%	33,213	62.08%	652	33,865	63.30%	4,481	8.38%
	VAP	39,576			23,676	59.82%	394	24,070	60.82%	2,924	7.39%
054		53,576	-244	-0.45%	6,132	11.45%	454	6,586	12.29%	4,581	8.55%
	VAP	44,566			5,448	12.22%	306	5,754	12.91%	3,405	7.64%
055		53,842	22	0.04%	37,621	69.87%	743	38,364	71.25%	1,482	2.75%
	VAP	43,597			29,543	67.76%	505	30,048	68.92%	1,174	2.69%
056		53,564	-256	-0.48%	31,024	57.92%	780	31,804	59.38%	1,832	3.42%
	VAP	46,750			25,255	54.02%	631	25,886	55.37%	1,619	3.46%
057		54,205	385	0.72%	30,771	56.77%	671	31,442	58.01%	2,798	5.16%
	VAP	45,178			24,643	54.55%	534	25,177	55.73%	2,120	4.69%
058		53,635	-185	-0.34%	32,345	60.31%	748	33,093	61.70%	2,092	3.90%
	VAP	44,854			25,212	56.21%	562	25,774	57.46%	1,733	3.86%
059		53,372	-448	-0.83%	28,660	53.70%	674	29,334	54.96%	6,170	11.56%
	VAP	40,952			20,482	50.01%	391	20,873	50.97%	4,253	10.39%
060		53,677	-143	-0.27%	38,767	72.22%	730	39,497	73.58%	7,554	14.07%
	VAP	38,830			27,858	71.74%	403	28,261	72.78%	4,662	12.01%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
061		54,224	404	0.75%	38,149	70.35%	875	39,024	71.97%	4,493	8.29%
	VAP	39,023			27,018	69.24%	402	27,420	70.27%	2,640	6.77%
062		53,740	-80	-0.15%	38,133	70.96%	954	39,087	72.73%	2,553	4.75%
	VAP	38,345			26,396	68.84%	454	26,850	70.02%	1,522	3.97%
063		53,547	-273	-0.51%	35,269	65.87%	810	36,079	67.38%	2,278	4.25%
	VAP	39,038			24,804	63.54%	398	25,202	64.56%	1,487	3.81%
064		53,952	132	0.25%	33,817	62.68%	799	34,616	64.16%	3,109	5.76%
	VAP	39,190			23,598	60.21%	406	24,004	61.25%	1,841	4.70%
065		54,298	478	0.89%	38,285	70.51%	894	39,179	72.16%	4,408	8.12%
	VAP	37,616			25,584	68.01%	425	26,009	69.14%	2,626	6.98%
066		54,130	310	0.58%	23,094	42.66%	876	23,970	44.28%	3,639	6.72%
	VAP	38,363			15,162	39.52%	338	15,500	40.40%	2,217	5.78%
067		54,230	410	0.76%	11,110	20.49%	630	11,740	21.65%	3,037	5.60%
	VAP	38,436			7,300	18.99%	230	7,530	19.59%	1,790	4.66%
068		54,226	406	0.75%	8,853	16.33%	678	9,531	17.58%	2,456	4.53%
	VAP	38,995			5,909	15.15%	165	6,074	15.58%	1,474	3.78%
069		54,158	338	0.63%	7,255	13.40%	470	7,725	14.26%	1,818	3.36%
	VAP	41,364			5,633	13.62%	138	5,771	13.95%	1,129	2.73%
070		54,341	521	0.97%	10,838	19.94%	542	11,380	20.94%	3,742	6.89%
	VAP	40,088			7,608	18.98%	163	7,771	19.38%	2,460	6.14%
071		54,165	345	0.64%	5,449	10.06%	407	5,856	10.81%	3,399	6.28%
	VAP	38,886			3,933	10.11%	146	4,079	10.49%	2,144	5.51%
072		53,807	-13	-0.02%	3,588	6.67%	351	3,939	7.32%	3,036	5.64%
	VAP	38,955			2,461	6.32%	113	2,574	6.61%	1,913	4.91%
073		53,951	131	0.24%	14,857	27.54%	639	15,496	28.72%	2,621	4.86%
	VAP	39,535			9,970	25.22%	208	10,178	25.74%	1,646	4.16%
074		53,401	-419	-0.78%	34,347	64.32%	850	35,197	65.91%	8,406	15.74%
	VAP	38,810			24,808	63.92%	463	25,271	65.11%	5,259	13.55%
075		53,930	110	0.20%	36,879	68.38%	1,054	37,933	70.34%	5,741	10.65%
	VAP	38,464			25,611	66.58%	483	26,094	67.84%	3,446	8.96%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
076		53,288	-532	-0.99%	34,414	64.58%	786	35,200	66.06%	4,951	9.29%
	VAP	38,157			23,894	62.62%	357	24,251	63.56%	3,019	7.91%
077		53,704	-116	-0.22%	37,203	69.27%	910	38,113	70.97%	8,525	15.87%
	VAP	37,349			25,612	68.57%	433	26,045	69.73%	5,151	13.79%
078		53,616	-204	-0.38%	31,896	59.49%	1,108	33,004	61.56%	5,790	10.80%
	VAP	38,129			21,597	56.64%	494	22,091	57.94%	3,625	9.51%
079		53,714	-106	-0.20%	7,883	14.68%	510	8,393	15.63%	7,608	14.16%
	VAP	41,179			6,289	15.27%	320	6,609	16.05%	5,275	12.81%
080		53,535	-285	-0.53%	6,054	11.31%	457	6,511	12.16%	11,065	20.67%
	VAP	43,496			5,068	11.65%	316	5,384	12.38%	7,674	17.64%
081		53,590	-230	-0.43%	5,687	10.61%	493	6,180	11.53%	20,956	39.10%
	VAP	41,186			4,247	10.31%	271	4,518	10.97%	14,601	35.45%
082		53,564	-256	-0.48%	7,969	14.88%	525	8,494	15.86%	12,180	22.74%
	VAP	43,727			6,815	15.59%	355	7,170	16.40%	8,522	19.49%
083		53,652	-168	-0.31%	33,705	62.82%	571	34,276	63.89%	1,467	2.73%
	VAP	41,089			24,998	60.84%	328	25,326	61.64%	1,023	2.49%
084		53,650	-170	-0.32%	32,938	61.39%	585	33,523	62.48%	1,284	2.39%
	VAP	41,782			24,546	58.75%	341	24,887	59.56%	907	2.17%
085		54,195	375	0.70%	32,012	59.07%	793	32,805	60.53%	1,954	3.61%
	VAP	41,110			23,561	57.31%	440	24,001	58.38%	1,360	3.31%
086		53,878	58	0.11%	33,655	62.47%	737	34,392	63.83%	2,214	4.11%
	VAP	40,880			24,798	60.66%	427	25,225	61.70%	1,490	3.64%
087		54,104	284	0.53%	36,835	68.08%	837	37,672	69.63%	3,125	5.78%
	VAP	40,610			26,585	65.46%	449	27,034	66.57%	2,190	5.39%
088		54,194	374	0.69%	34,637	63.91%	979	35,616	65.72%	6,361	11.74%
	VAP	40,173			24,669	61.41%	586	25,255	62.87%	4,198	10.45%
089		53,838	18	0.03%	34,951	64.92%	637	35,588	66.10%	1,503	2.79%
	VAP	42,011			26,139	62.22%	361	26,500	63.08%	1,071	2.55%
090		53,620	-200	-0.37%	36,611	68.28%	714	37,325	69.61%	1,408	2.63%
	VAP	39,580			26,443	66.81%	399	26,842	67.82%	864	2.18%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
091		54,022	202	0.38%	35,420	65.57%	811	36,231	67.07%	2,175	4.03%
	VAP	39,377			24,512	62.25%	415	24,927	63.30%	1,384	3.51%
092		54,205	385	0.72%	36,762	67.82%	776	37,538	69.25%	6,562	12.11%
	VAP	38,475			25,431	66.10%	381	25,812	67.09%	4,018	10.44%
093		54,333	513	0.95%	36,227	66.68%	1,104	37,331	68.71%	3,671	6.76%
	VAP	37,658			24,013	63.77%	494	24,507	65.08%	2,177	5.78%
094		53,570	-250	-0.46%	36,237	67.64%	995	37,232	69.50%	3,550	6.63%
	VAP	38,031			24,673	64.88%	481	25,154	66.14%	2,148	5.65%
095		54,289	469	0.87%	11,420	21.04%	715	12,135	22.35%	8,319	15.32%
	VAP	39,953			7,981	19.98%	367	8,348	20.89%	5,381	13.47%
096		53,962	142	0.26%	10,302	19.09%	786	11,088	20.55%	18,505	34.29%
	VAP	39,523			7,170	18.14%	352	7,522	19.03%	11,993	30.34%
097		53,821	1	0.00%	5,908	10.98%	505	6,413	11.92%	5,064	9.41%
	VAP	38,410			3,878	10.10%	189	4,067	10.59%	3,202	8.34%
098		53,671	-149	-0.28%	6,717	12.52%	553	7,270	13.55%	8,695	16.20%
	VAP	37,068			4,376	11.81%	169	4,545	12.26%	5,260	14.19%
099		53,673	-147	-0.27%	11,385	21.21%	760	12,145	22.63%	29,958	55.82%
	VAP	37,254			8,028	21.55%	352	8,380	22.49%	19,276	51.74%
100		53,679	-141	-0.26%	17,322	32.27%	1,057	18,379	34.24%	20,465	38.12%
	VAP	37,465			11,910	31.79%	452	12,362	33.00%	12,873	34.36%
101		53,747	-73	-0.14%	11,266	20.96%	721	11,987	22.30%	11,208	20.85%
	VAP	38,785			7,513	19.37%	300	7,813	20.14%	7,056	18.19%
102		53,770	-50	-0.09%	10,217	19.00%	785	11,002	20.46%	7,262	13.51%
	VAP	39,110			7,083	18.11%	353	7,436	19.01%	4,984	12.74%
103		53,533	-287	-0.53%	5,439	10.16%	428	5,867	10.96%	5,619	10.50%
	VAP	37,957			3,699	9.75%	144	3,843	10.12%	3,420	9.01%
104		53,774	-46	-0.09%	12,344	22.96%	679	13,023	24.22%	6,730	12.52%
	VAP	36,121			7,783	21.55%	244	8,027	22.22%	4,149	11.49%
105		53,542	-278	-0.52%	17,754	33.16%	819	18,573	34.69%	6,527	12.19%
	VAP	36,449			11,266	30.91%	331	11,597	31.82%	3,945	10.82%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
106		53,473	-347	-0.64%	15,161	28.35%	818	15,979	29.88%	5,451	10.19%
	VAP	38,585			9,774	25.33%	319	10,093	26.16%	3,298	8.55%
107		53,368	-452	-0.84%	12,120	22.71%	697	12,817	24.02%	10,021	18.78%
	VAP	37,377			7,826	20.94%	295	8,121	21.73%	6,104	16.33%
108		53,549	-271	-0.50%	8,812	16.46%	619	9,431	17.61%	10,315	19.26%
	VAP	39,456			5,970	15.13%	265	6,235	15.80%	6,437	16.31%
109		54,153	333	0.62%	16,366	30.22%	681	17,047	31.48%	2,434	4.49%
	VAP	38,385			10,881	28.35%	262	11,143	29.03%	1,467	3.82%
110		54,298	478	0.89%	17,021	31.35%	682	17,703	32.60%	2,450	4.51%
	VAP	38,485			11,454	29.76%	223	11,677	30.34%	1,472	3.82%
111		54,293	473	0.88%	18,415	33.92%	754	19,169	35.31%	3,217	5.93%
	VAP	38,235			12,060	31.54%	293	12,353	32.31%	2,003	5.24%
112		53,657	-163	-0.30%	11,816	22.02%	405	12,221	22.78%	1,664	3.10%
	VAP	40,120			8,436	21.03%	116	8,552	21.32%	1,010	2.52%
113		53,670	-150	-0.28%	31,651	58.97%	986	32,637	60.81%	3,129	5.83%
	VAP	37,191			20,824	55.99%	390	21,214	57.04%	1,827	4.91%
114		53,571	-249	-0.46%	8,328	15.55%	452	8,780	16.39%	3,148	5.88%
	VAP	38,119			5,386	14.13%	180	5,566	14.60%	1,883	4.94%
115		53,559	-261	-0.48%	10,507	19.62%	446	10,953	20.45%	1,482	2.77%
	VAP	39,330			7,264	18.47%	122	7,386	18.78%	897	2.28%
116		53,885	65	0.12%	5,611	10.41%	574	6,185	11.48%	4,524	8.40%
	VAP	38,935			3,872	9.94%	147	4,019	10.32%	2,691	6.91%
117		54,352	532	0.99%	9,709	17.86%	454	10,163	18.70%	4,069	7.49%
	VAP	43,102			7,216	16.74%	183	7,399	17.17%	2,663	6.18%
118		53,858	38	0.07%	18,108	33.62%	557	18,665	34.66%	8,188	15.20%
	VAP	42,287			12,713	30.06%	285	12,998	30.74%	5,013	11.85%
119		53,330	-490	-0.91%	6,265	11.75%	333	6,598	12.37%	2,297	4.31%
	VAP	43,291			4,884	11.28%	168	5,052	11.67%	1,660	3.83%
120		53,857	37	0.07%	16,605	30.83%	456	17,061	31.68%	2,780	5.16%
	VAP	42,036			12,251	29.14%	143	12,394	29.48%	1,722	4.10%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
121		54,069	249	0.46%	13,423	24.83%	666	14,089	26.06%	2,902	5.37%
	VAP	39,434			9,176	23.27%	181	9,357	23.73%	1,781	4.52%
122		53,789	-31	-0.06%	6,226	11.57%	518	6,744	12.54%	2,262	4.21%
	VAP	38,559			4,361	11.31%	184	4,545	11.79%	1,410	3.66%
123		54,305	485	0.90%	9,760	17.97%	599	10,359	19.08%	1,999	3.68%
	VAP	41,748			7,090	16.98%	212	7,302	17.49%	1,331	3.19%
124		53,886	66	0.12%	30,939	57.42%	770	31,709	58.84%	2,081	3.86%
	VAP	42,242			22,804	53.98%	373	23,177	54.87%	1,469	3.48%
125		54,151	331	0.62%	28,973	53.50%	921	29,894	55.20%	1,676	3.10%
	VAP	39,400			19,900	50.51%	339	20,239	51.37%	1,044	2.65%
126		53,613	-207	-0.38%	32,597	60.80%	823	33,420	62.34%	1,876	3.50%
	VAP	38,267			22,371	58.46%	340	22,711	59.35%	1,202	3.14%
127		53,672	-148	-0.27%	29,218	54.44%	893	30,111	56.10%	2,937	5.47%
	VAP	40,411			20,748	51.34%	418	21,166	52.38%	2,110	5.22%
128		53,559	-261	-0.48%	30,209	56.40%	285	30,494	56.94%	957	1.79%
	VAP	41,388			22,575	54.54%	106	22,681	54.80%	714	1.73%
129		53,337	-483	-0.90%	14,381	26.96%	360	14,741	27.64%	1,278	2.40%
	VAP	40,449			10,955	27.08%	109	11,064	27.35%	809	2.00%
130		53,697	-123	-0.23%	18,943	35.28%	516	19,459	36.24%	1,881	3.50%
	VAP	39,742			13,066	32.88%	199	13,265	33.38%	1,201	3.02%
131		54,163	343	0.64%	13,302	24.56%	383	13,685	25.27%	941	1.74%
	VAP	41,142			10,180	24.74%	116	10,296	25.03%	620	1.51%
132		53,756	-64	-0.12%	22,850	42.51%	611	23,461	43.64%	2,993	5.57%
	VAP	38,796			15,728	40.54%	150	15,878	40.93%	2,014	5.19%
133		53,564	-256	-0.48%	10,194	19.03%	309	10,503	19.61%	1,442	2.69%
	VAP	40,825			7,453	18.26%	104	7,557	18.51%	953	2.33%
134		53,328	-492	-0.91%	8,669	16.26%	693	9,362	17.56%	2,977	5.58%
	VAP	40,802			6,422	15.74%	262	6,684	16.38%	1,962	4.81%
135		53,588	-232	-0.43%	30,110	56.19%	1,125	31,235	58.29%	4,186	7.81%
	VAP	39,104			21,170	54.14%	443	21,613	55.27%	2,757	7.05%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
136		53,614	-206	-0.38%	30,009	55.97%	1,138	31,147	58.09%	3,646	6.80%
	VAP	39,806			21,582	54.22%	480	22,062	55.42%	2,387	6.00%
137		53,431	-389	-0.72%	28,843	53.98%	719	29,562	55.33%	1,627	3.05%
	VAP	39,957			20,679	51.75%	250	20,929	52.38%	1,047	2.62%
138		53,825	5	0.01%	21,540	40.02%	442	21,982	40.84%	3,609	6.71%
	VAP	39,760			15,006	37.74%	177	15,183	38.19%	2,328	5.86%
139		53,594	-226	-0.42%	30,419	56.76%	354	30,773	57.42%	2,853	5.32%
	VAP	41,652			23,330	56.01%	204	23,534	56.50%	1,875	4.50%
140		54,060	240	0.45%	17,710	32.76%	493	18,203	33.67%	2,454	4.54%
	VAP	41,014			12,871	31.38%	147	13,018	31.74%	1,567	3.82%
141		54,344	524	0.97%	13,277	24.43%	392	13,669	25.15%	1,274	2.34%
	VAP	41,154			9,099	22.11%	139	9,238	22.45%	833	2.02%
142		53,493	-327	-0.61%	35,250	65.90%	496	35,746	66.82%	1,517	2.84%
	VAP	38,488			24,083	62.57%	203	24,286	63.10%	942	2.45%
143		53,945	125	0.23%	33,332	61.79%	483	33,815	62.68%	1,502	2.78%
	VAP	40,592			23,357	57.54%	234	23,591	58.12%	1,014	2.50%
144		53,343	-477	-0.89%	14,930	27.99%	300	15,230	28.55%	1,376	2.58%
	VAP	40,553			11,095	27.36%	104	11,199	27.62%	877	2.16%
145		53,485	-335	-0.62%	21,392	40.00%	366	21,758	40.68%	1,251	2.34%
	VAP	42,344			15,623	36.90%	115	15,738	37.17%	862	2.04%
146		53,671	-149	-0.28%	13,251	24.69%	608	13,859	25.82%	2,228	4.15%
	VAP	38,823			9,286	23.92%	189	9,475	24.41%	1,390	3.58%
147		53,333	-487	-0.90%	15,436	28.94%	829	16,265	30.50%	4,311	8.08%
	VAP	39,589			10,438	26.37%	293	10,731	27.11%	2,733	6.90%
148		53,393	-427	-0.79%	19,030	35.64%	322	19,352	36.24%	1,831	3.43%
	VAP	40,651			13,743	33.81%	126	13,869	34.12%	1,160	2.85%
149		53,612	-208	-0.39%	17,201	32.08%	322	17,523	32.68%	3,690	6.88%
	VAP	41,813			13,187	31.54%	115	13,302	31.81%	2,916	6.97%
150		54,142	322	0.60%	18,753	34.64%	356	19,109	35.29%	1,247	2.30%
	VAP	40,188			12,988	32.32%	116	13,104	32.61%	785	1.95%

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
151		54,071	251	0.47%	29,610	54.76%	313	29,923	55.34%	2,394	4.43%
	VAP	41,637			21,454	51.53%	134	21,588	51.85%	2,061	4.95%
152		53,990	170	0.32%	12,855	23.81%	284	13,139	24.34%	1,132	2.10%
	VAP	39,824			9,127	22.92%	77	9,204	23.11%	710	1.78%
153		54,116	296	0.55%	33,967	62.77%	490	34,457	63.67%	1,580	2.92%
	VAP	40,411			23,848	59.01%	205	24,053	59.52%	1,045	2.59%
154		53,972	152	0.28%	33,354	61.80%	360	33,714	62.47%	862	1.60%
	VAP	40,393			23,672	58.60%	178	23,850	59.04%	513	1.27%
155		54,043	223	0.41%	15,240	28.20%	281	15,521	28.72%	2,831	5.24%
	VAP	40,679			10,900	26.80%	83	10,983	27.00%	1,681	4.13%
156		53,637	-183	-0.34%	12,233	22.81%	319	12,552	23.40%	4,969	9.26%
	VAP	39,399			8,497	21.57%	74	8,571	21.75%	2,899	7.36%
157		54,334	514	0.96%	14,713	27.08%	424	15,137	27.86%	4,887	8.99%
	VAP	41,282			11,249	27.25%	118	11,367	27.54%	3,022	7.32%
158		53,861	41	0.08%	18,526	34.40%	315	18,841	34.98%	2,949	5.48%
	VAP	40,158			12,947	32.24%	93	13,040	32.47%	1,874	4.67%
159		53,363	-457	-0.85%	15,415	28.89%	402	15,817	29.64%	1,038	1.95%
	VAP	39,250			10,779	27.46%	127	10,906	27.79%	620	1.58%
160		53,304	-516	-0.96%	10,997	20.63%	445	11,442	21.47%	1,887	3.54%
	VAP	43,070			8,753	20.32%	216	8,969	20.82%	1,351	3.14%
161		53,931	111	0.21%	9,998	18.54%	529	10,527	19.52%	2,617	4.85%
	VAP	39,726			7,006	17.64%	179	7,185	18.09%	1,656	4.17%
162		53,981	161	0.30%	27,992	51.86%	803	28,795	53.34%	5,485	10.16%
	VAP	39,859			19,383	48.63%	336	19,719	49.47%	3,728	9.35%
163		53,520	-300	-0.56%	28,079	52.46%	530	28,609	53.45%	1,758	3.28%
	VAP	42,793			20,228	47.27%	321	20,549	48.02%	1,475	3.45%
164		53,429	-391	-0.73%	13,204	24.71%	1,021	14,225	26.62%	4,381	8.20%
	VAP	37,716			8,909	23.62%	333	9,242	24.50%	2,632	6.98%
165		54,351	531	0.99%	30,977	56.99%	701	31,678	58.28%	2,028	3.73%
	VAP	41,872			22,491	53.71%	316	22,807	54.47%	1,408	3.36%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT		POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
166		54,038	218	0.41%	4,275	7.91%	272	4,547	8.41%	1,443	2.67%
	VAP	43,168			3,291	7.62%	101	3,392	7.86%	969	2.24%
167		54,342	522	0.97%	12,046	22.17%	583	12,629	23.24%	3,335	6.14%
	VAP	40,594			8,684	21.39%	198	8,882	21.88%	2,006	4.94%
168		54,032	212	0.39%	24,420	45.20%	1,531	25,951	48.03%	4,881	9.03%
	VAP	38,351			16,808	43.83%	556	17,364	45.28%	2,968	7.74%
169		53,952	132	0.25%	12,331	22.86%	390	12,721	23.58%	5,644	10.46%
	VAP	39,735			8,807	22.16%	105	8,912	22.43%	3,339	8.40%
170		53,301	-519	-0.96%	12,065	22.64%	311	12,376	23.22%	3,742	7.02%
	VAP	39,206			8,174	20.85%	87	8,261	21.07%	2,166	5.52%
171		54,189	369	0.69%	21,032	38.81%	261	21,293	39.29%	3,444	6.36%
	VAP	40,274			14,885	36.96%	87	14,972	37.18%	2,118	5.26%
172		53,287	-533	-0.99%	15,471	29.03%	309	15,780	29.61%	7,770	14.58%
	VAP	38,475			10,638	27.65%	108	10,746	27.93%	4,659	12.11%
173		54,287	467	0.87%	19,776	36.43%	330	20,106	37.04%	3,674	6.77%
	VAP	40,561			14,138	34.86%	133	14,271	35.18%	2,291	5.65%
174		54,123	303	0.56%	12,704	23.47%	537	13,241	24.46%	3,582	6.62%
	VAP	39,946			8,967	22.45%	150	9,117	22.82%	2,218	5.55%
175		53,794	-26	-0.05%	14,166	26.33%	261	14,427	26.82%	2,008	3.73%
	VAP	41,150			10,447	25.39%	112	10,559	25.66%	1,306	3.17%
176		54,193	373	0.69%	12,876	23.76%	507	13,383	24.70%	4,129	7.62%
	VAP	40,044			9,532	23.80%	167	9,699	24.22%	2,471	6.17%
177		54,095	275	0.51%	29,446	54.43%	637	30,083	55.61%	2,298	4.25%
	VAP	41,485			20,793	50.12%	294	21,087	50.83%	1,649	3.97%
178		53,463	-357	-0.66%	4,529	8.47%	273	4,802	8.98%	2,402	4.49%
	VAP	40,080			3,528	8.80%	80	3,608	9.00%	1,586	3.96%
179		54,081	261	0.48%	17,476	32.31%	512	17,988	33.26%	3,796	7.02%
	VAP	41,101			12,003	29.20%	184	12,187	29.65%	2,455	5.97%
180		53,321	-499	-0.93%	10,316	19.35%	728	11,044	20.71%	2,504	4.70%
	VAP	39,225			7,131	18.18%	209	7,340	18.71%	1,577	4.02%

DATA SOURCE: 2010 US Census PL94-171 Population Cou

Plan Name: **House15** Plan Type : **State** User: **Gina** Administrator: **House**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP

Total Population: 9,687,653

Ideal Value: 53,820

Summary Statistics

Population Range: 53,287 to 54,352

Absolute Overall Range: 1,065

Relative Range: -0.99% to 0.99%

Relative Overall Range: 1.98%

Message

From: Ray S. Smith, III [rsmith@smithliss.com]
Sent: 11/11/2021 4:25:48 PM
To: O'Connor, Dan [Dan.O'Connor@legis.ga.gov]
Subject: RE: New State House district maps [*** External Email ***]

EXTERNAL EMAIL: Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Are any of the SS districts "lean R"?

Ray S. Smith III
Partner

SMITH & LISS, LLC
Five Concourse Parkway
Suite 2600
Atlanta, Georgia 30328
Direct: (404)760.6006
Main: (404) 760.6000
Facsimile: (404) 760.0225
rsmith@smithliss.com

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From: O'Connor, Dan <Dan.O'Connor@legis.ga.gov>
Sent: Thursday, November 11, 2021 11:16 AM
To: Ray S. Smith, III <rsmith@smithliss.com>
Subject: New State House district maps

HI Ray:

Following up on your request, attached are maps and population data concerning the State House redistricting (House-Prop1-2021) adopted by the House yesterday. (To avoid "attachment overload"---that is, email that bounces back when there are too many attachments), I will email the Senate version after this one. (Maps also are posted on our website by going to the General Assembly website, then clicking "joint offices" and "Reapportionment", under "proposed plans"). The Senate Redistricting and Reapportionment Committee is meeting this afternoon and might take up the House redistricting proposal at that time---though the agenda on the meeting notice currently says "TBD"

Looks like Sandy Springs is divided into 4 districts under the new House map---51, 52, 53 and 54. (with all 4 districts shared with other cities---in other words, there is no House district that is entirely contained within Sandy Springs). 51 basically takes in the "Panhandle" east of Roswell Road; 52 is basically central Sandy Springs and parts of Brookhaven/Dunwoody in DeKalb; 53 runs along the Chattahoochee in Sandy Springs from Roswell to Peachtree Creek in Buckhead and 54 takes in southeast corner of the city roughly south of 285 and east of Lake Forrest Drive, continuing down into Buckhead and ending just across from Christ the King on East Wesley Road.

--Dan O'Connor

Message

From: Wright, Gina [/O=GEORGIA GENERAL ASSEMBLY/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=GINA.WRIGHT]
Sent: 11/15/2021 1:39:58 PM
To: Knight, Brian (Brian.Knight@legis.ga.gov) [Brian.Knight@legis.ga.gov]; O'Connor, Dan [Dan.O'Connor@legis.ga.gov]; Cooper, Tonya (Tonya.Cooper@legis.ga.gov) [Tonya.Cooper@legis.ga.gov]; Mesriah, Gabe [Gabe.Mesriah@legis.ga.gov]; Wigton, Maggie [Maggie.Wigton@legis.ga.gov]; Robert Strangia [Rob.Strangia@legis.ga.gov]
Subject: FW: Dinner invitation from House Reapportionment Committee Chairman Bonnie Rich

All:

The House committee is having a dinner on Wednesday evening at 7 pm at Agave Restaurant and we are invited to attend. Please let me know today if you plan to be there so I can let Julie know for our office at one time

Thanks!

Gina

TO: House Legislative and Congressional Reapportionment Committee Members

Chairman Rich would like to invite you all to an appreciation dinner on Wednesday, November 17th at 7:00 p.m. on the patio at Agave Restaurant near the Capitol (242 Boulevard SE, Atlanta, GA 30312).

Please RSVP by close of business on Monday, November 15th. Thank you and she hopes to see you there! Julie

Gina Harkin Wright
Executive Director

Legislative and Congressional Reapportionment Office
Georgia General Assembly
18 Capitol Square, Suite 407
Coverdell Legislative Office Building
Atlanta, Georgia 30334
(404)656-5063
https://www.legis.ga.gov/joint-office/reapportionment

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From: Sutton, Julie <Julie.Sutton@house.ga.gov>
Sent: Sunday, November 14, 2021 5:05 PM
To: Wright, Gina <Gina.Wright@legis.ga.gov>; Cooper, Tonya <Tonya.Cooper@legis.ga.gov>; O'Connor, Dan <Dan.O'Connor@legis.ga.gov>; Knight, Brian <Brian.Knight@legis.ga.gov>; Aziz, Molly <Molly.Aziz@house.ga.gov>; Theroux, Betsy <Betsy.Theroux@house.ga.gov>; Taylor, Camille <Camille.Taylor@house.ga.gov>; Speck, Justin

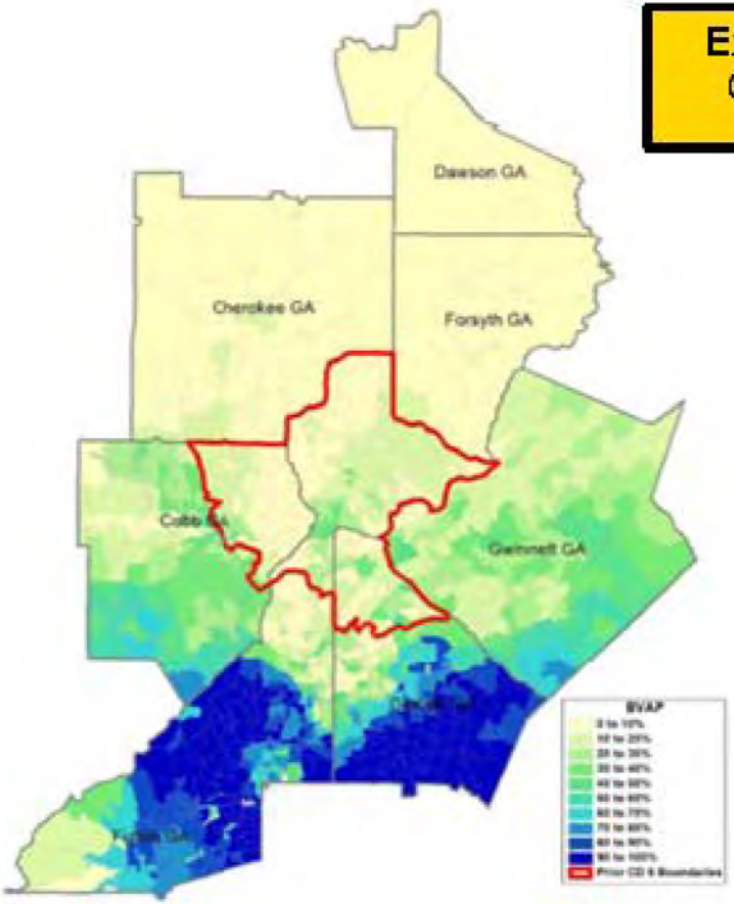
<Justin.Speck@house.ga.gov>
Cc: Rich, Bonnie <Bonnie.Rich@house.ga.gov>
Subject: Dinner invitation from House Reapportionment Committee Chairman Bonnie Rich

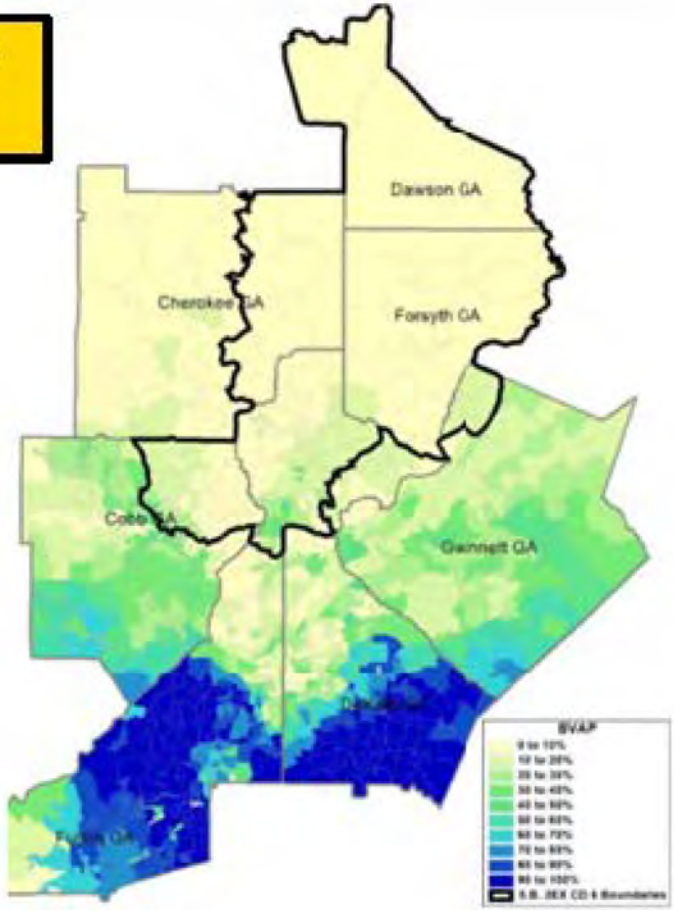
Good evening, I wanted to confirm with you that your invitation to dinner on Wednesday, November 17, at Agave was not a courtesy copy from the Reapportionment email group. Chairman Rich very much appreciates all of you and your time and hard work during the lengthy reapportionment process and would like to acknowledge her appreciation. Hope you can all attend! Julie

Julie Sutton
Office of Representative Bonnie Rich, Dist 97
Georgia House of Representatives
Coverdell Legislative Office Building
18 Capital Square, Suite 402
Atlanta, GA 30334
404-656-5087 Office
julie.sutton@house.ga.gov

District 6

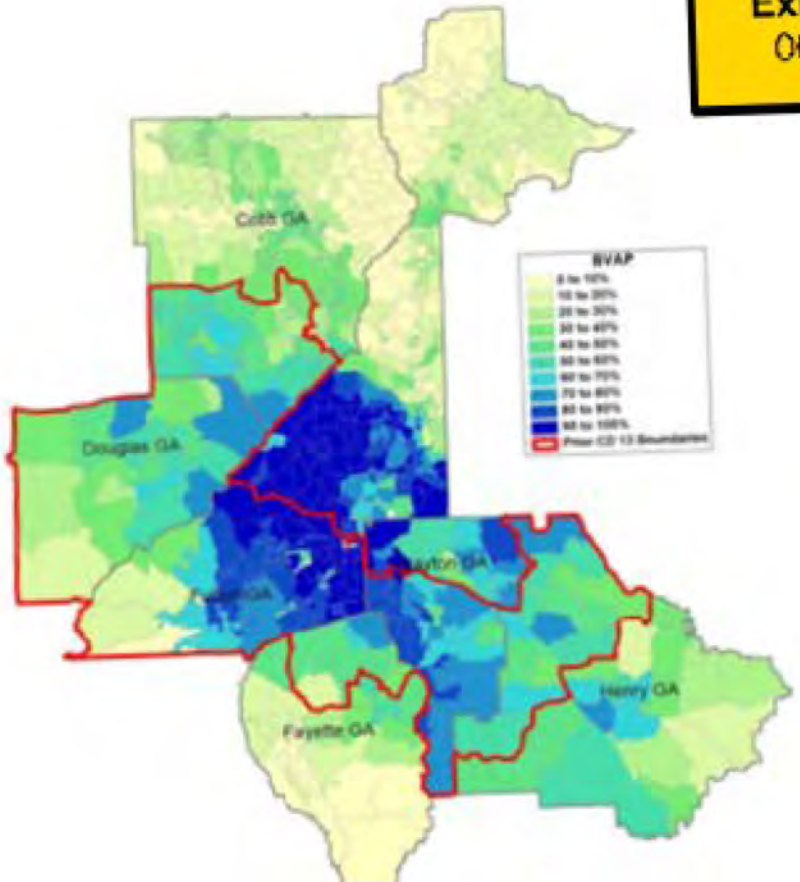
Exhibit
0010

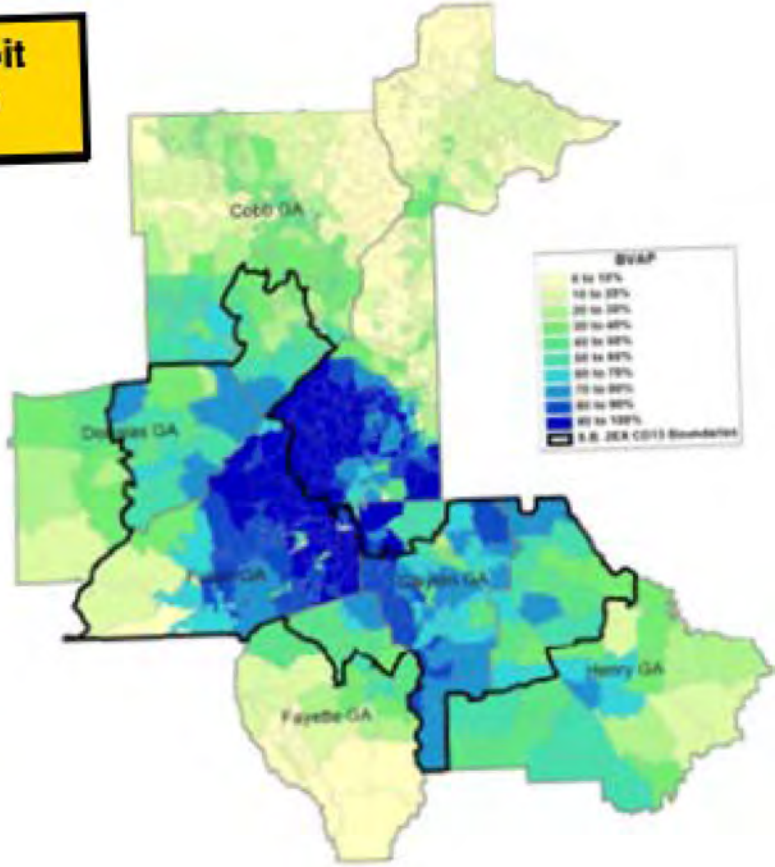




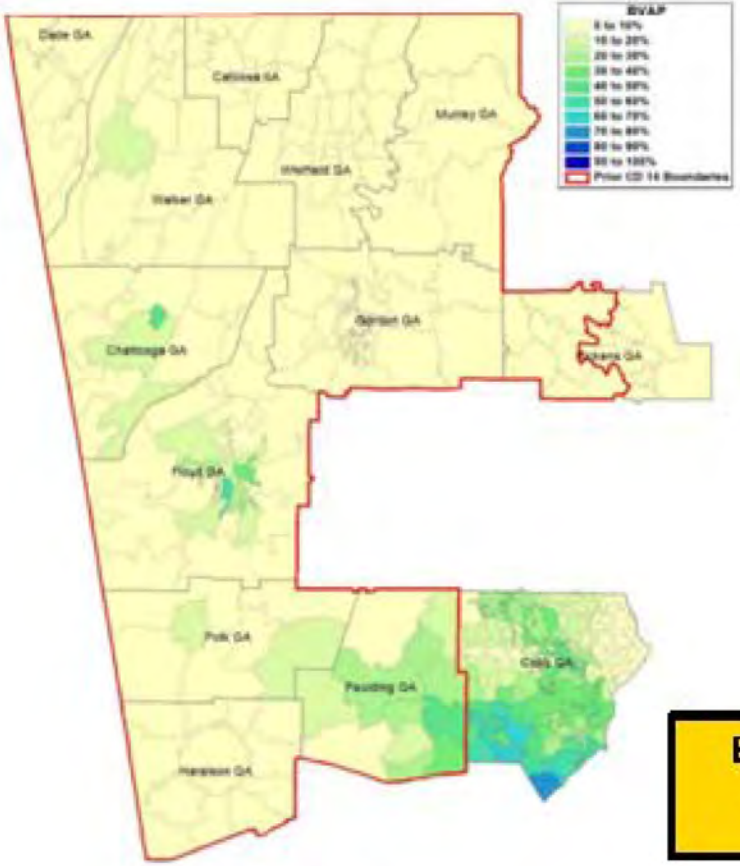
District 13

Exhibit
0011





District 14



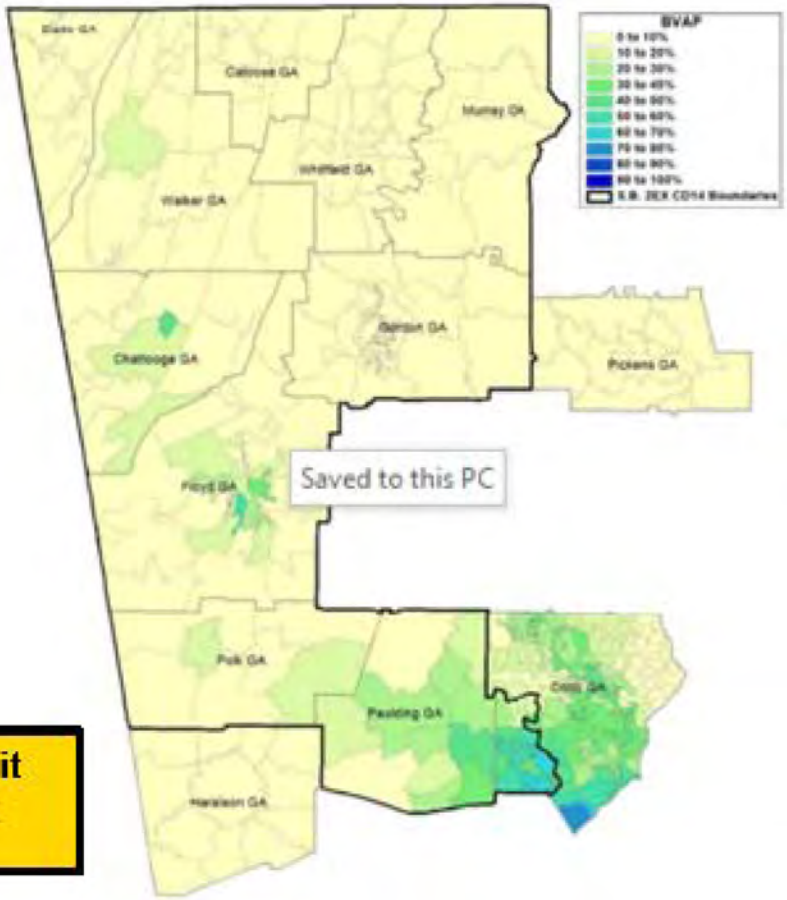


Exhibit
0012

Message

From: Strangia, Rob [/O=GEORGIA GENERAL ASSEMBLY/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=ROB.STRANGIA]
Sent: 4/30/2020 7:02:01 PM
To: Wright, Gina [Gina.Wright@legis.ga.gov]
CC: Knight, Brian [Brian.Knight@legis.ga.gov]; O'Connor, Dan [Dan.O'Connor@legis.ga.gov]
Subject: Differential Privacy City(Census Place) Report
Attachments: CITY DP REPORT.xlsx

TO: Gina
CC: Brian/Dan

Attached is the City(Census Place Report). The attributes are the same as the previous county report. I think that you will find this "interesting". After taking a quick look at the racial data for some of the smaller cities, I saw some large discrepancies. Just look at Hispanic for Blue Ridge! I'm glad that you are finding this data "useful"!

Rob

Robert M. Strangia, GISP
GIS Administrator

Georgia Legislative Redistricting Services Office
18 Capitol Sq. SW, Suite 407 COB
Atlanta, GA 30334

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Exhibit
0013