UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

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

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

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

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

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Also Present:

Shawn Marie Story, Deputy Legislative Counsel
Eric Lucas, videographer
Jason Enos

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

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

MR. CANTER: Jacob Canter representing the plaintiffs.

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

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

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

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

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

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

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

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

Lawyers' Committee Under Civil Rights Under Law.

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

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

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

THE REPORTER: Say your name again.

MR. STEINER: Neil Steiner.

THE REPORTER: Thank you.

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

GINA WRIGHT,

called as a witness herein, having been first duly sworn by the shorthand reporter to speak the truth and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY MR. CANTER:

Q Good morning, Director Wright.

A Good morning.

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

A I'm the person who drew it, worked with the technology to draw the map.
Q Who at your office did you work with in drawing the Congressional map?
A Like staff of the office; is that what you mean?
Q Yes, ma'am.
A No one else.
Q Did Brian Knight help you draw the map?
A No.
Q Did Dan O'Connor help you draw the map?
A No.
Q Rob Strangia?
A No.
Q Bryan Tyson?
A He's not staff at my office.
Q That's fair.
But did Bryan Tyson help you draw the map?
A Bryan Tyson consulted as the attorney that was counsel on that.
Q Did Brian Knight help you with the map drawing for the Congressional map in any way?
A No.
Q Did you speak with him about the map?
A Not to my recollection.

Q Did he see the map ever?
A After it was made public.
Q How about before it was made public?
A I don't recollect him seeing that before then.
Q Did you -- did Dan O'Connor work on the Congressional map in any way with you?
A No.
Q Did Dan O'Connor see the map prior to it being enacted?
A No.
Q How about prior to it being made public?
A No.
Q Did you speak with Mr. O'Connor about the map prior to it being made public?
A No.
Q Outside of your office, did you speak with anyone about the Congressional map?
A Yes.
Q Who?
A Chairmans Kennedy and Chairman Rich, Bryan Tyson, and there may have been others. I don't recall right now.
Q Okay. If you don't mind, we're going to walk through these.
So you said that you spoke with Chairman

Kennedy about the Congressional map?
A Yes.
Q And this was before it was made public?
A Yes.
Q Do you recall when you spoke with him?
A I'm sure numerous times.
Q Approximately how many times?
A I couldn't say. I don't know.
Q Do you remember the time period?
A During the time we worked on the map, after the Census data was out, before the maps were made public.
Q Did you ever show him draft maps?
A Yes.
Q Were you in the room together when you showed him draft maps?
A Yes.
Q Did he see draft maps on a screen?
A Yes.
Q When you showed him the draft maps, did you have the ability to make changes to the lines?
A Yes.
Q Did he ask you to make changes?
A I don't recall specifically.
Q In general, did he ever ask you to make changes to the lines, not necessarily when you were together?

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

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

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

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

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

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

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

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

A Uh-huh.

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

A Correct. He could have had multiple

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

Q Did you ever ask?

A No.

Q Did he ever offer information like that?

A I don't recall.

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

A Yes.

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

A I'm sure at some point I did.

Q Can you recall some points when he did?

A Not specifically.

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

A Can you say that again, please?

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

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

Q Do you recall making specific changes to the

map based off some type of instruction from Chairman Kennedy?

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

Q You've been talking about Chairman Kennedy.

A Uh-huh.

Q Would your answer be the same with Chairman Rich?

A Yes.

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

A No.

Q Did you ever meet with both chairmen together?

A I think I did, at least once.

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

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

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

Q Sure.

A -- to recall specifics on that.

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

A I don't know.

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

A No, probably not 100 times.

Q 50 times?

A Maybe.

Q Okay.

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

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

A Perhaps on the phone.

Q Ever over Zoom?

A Yes.

Q Did you ever show a map over Zoom?

A Yes.

Q The video was on when you were on Zoom?

A What do you mean the video was on?

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

A Yes, I think the video was on.

Q Okay, yeah.

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

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

A Correct.

(Court reporter clarification.)

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

A Yes.

Q And you also discovered the ultimately enacted map?

A Yes.

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

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

Q Sure.

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

A I believe so, probably.

Q And these discussions were sometimes in person,

sometimes over Zoom, and sometimes over telephone?

A Yes.

Q Any other ways you communicated?

A I don't think so.

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

A Yes.

Q Whom?

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

Q That's --

A But not related to the content of the map.

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

A Okay.

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

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

Q But mostly you were speaking with Chairman Kennedy?

A Correct.

Q The vast majority?
A The vast majority.
Q The same question about Chairman Rich. Did you speak with anyone on Chairman Rich's staff about developing the Congressional map?
A No.
Q You only spoke with Chairman Rich?
A Correct.
Q Did Chairman Kennedy and Chairman Rich provide final approval on the maps before they were made -- sorry.
Did Chairman Kennedy and Chairman Rich provide final approval on the Congressional map before that one was made public?
A When you say "final approval," what do you mean?
Q Right before it was made public.
A But what kind of -- what do you mean by "final approval?" Just saying okay or something beyond that?
Q At this point just meaning they accepted it, and you needed their acceptance before it was made public?
A Yes.
Q Do you remember when that was?
A I don't remember the specific date.

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

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

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

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

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

A Yes.

Q Is it the same with Chairman Rich?

A Yes.

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

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

Q Can you elaborate on why you prefer that?

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

Q And why --

A -- easier.

Q I'm sorry.
A You create along a record when you do that, so it's much better to have that conversation in person.
Q I understand.
Approximately when did you first begin speaking with Chairman Kennedy and Chairman Rich about the Congressional map?
A Which Congressional map? The final version?
Q The final Congressional map.
A I'm not sure of the date that we began talking about that.
Q How about, when did you first begin speaking with Chairman Kennedy and Chairman Rich about any draft of the Congressional map?
A Chairman Kennedy and I spoke, I think it was in -- Chairman Kennedy and I spoke, I believe in September at some point, regarding the initial Congressional District map draft that was the one that you referred to on our website. I don't recall specifically when a Congressional map discussion came up. The initial focus was to start with the -- the House and Senate, so --
Q Yeah.
A -- I don't recall when in that process we began to talk about congressional.

Q We will get to the House and Senate momentarily.
A Yeah.
(Court reporter clarification.)
Q BY MR. CANTER: You said a moment ago that you spoke with Chairman Kennedy about the September map at some point in September.
A Uh-huh.
Q Did he draw the September map?
A No.
Q Why is it called the Duncan-Kennedy map? Does the "Kennedy" refer to Chairman Kennedy?
A Yes.
Q Then why is it called the Kennedy map?
A I didn't call it that. It has a plan name, so I don't know who calls it that.
Q Got it.
A I think they released a press release, so that may be why they started calling it that way. I'm not sure why --
Q Okay. Fair enough.
A -- they refer to that. But maps that are from our office have to have legislative sponsorship, so they do have to come through a member of the General Assembly in order to draw one, so...

Q Sure. Okay. That makes sense.
Did Chairman Kennedy have any opinions about the September map?
A Opinions in what way?
Q About the composition of the districts in the September map.
A Before its creation or after?
Q Before its creation.
A Yes.
Q Do you remember those?
A Not well enough to tell you what they were, but did he have them, yes.
Q Do you think that if we look at documents for specific districts later, you would be able to recall some of them?
A Possibly, because I know there was a document. Like I said, the staff person e-mailed me related to that.
Q Just so I understand, a staff member on -- one of Chairman Kennedy's staff members e-mailed you about an early draft of the Congressional map?
A Yes.
Q And maybe looking at that document would refresh your recollection on what he --
A Yes.

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

A Are you referring to the --

Q September version.

A No, I did not.

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

A The versions that came later on, yes.

Q And did she have opinions about them?

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

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

A Possibly so.

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

A Yes.

Q -- is that correct?

What did you guys discuss?

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

THE WITNESS: Can you repeat that?

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

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

Q When did these conversations occur?

A During the same time period as all of this.

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

A In a group meeting, yes.

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

A Yes.

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

A Yes.

Q In person?

A All three of them? Four?

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

A I was wondering who else was there.

Q Yeah, that's right. I apologize.

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

A Yes.

Q And were those conversations ever in person?

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

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

A Yes.

Q And that's all of those that --

A Pretty much what I do.

Q All right. Yeah.

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

A Yes.

Q And you drew it with Maptitude?

A Yes.

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

A Yes.

Q Is there anyone else that you spoke with?

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

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

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

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

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

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

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

Q Regarding the formation of the Congressional map.

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

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

A I don't recall that.

Q Anyone in your office?

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

(Court reporter clarification.)

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

A Yes.

Q Do you recall those discussions?

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

Q When did it occur?

A I do not know the date.

Q In September?
A No.
Q In October?
A Possibly. October sounds -- maybe.
Q Late October?
A It had to be in that time window because it's a narrow time window, so maybe October.
Q Late October?
A I couldn't say specifically.
Q Do you recall if it was closer to when the September 27th map was made public or was it closer to when the ultimately enacted map was made public?
A I don't think it was close to the September time frame, but I don't know exactly the date.
Q Do you remember, what did you guys talk about?
A The Congressional map.
Q Who was at the meeting?
A The -- the names I gave you previously.
Q So just to be clear, you had a meeting with -- about the Congressional map at some time closer to the enacted map's publication with Chairmans Kennedy, Rich, Mr. Tyson, Speaker Ralston, Lieutenant Governor Duncan, and staff of the Speaker and Lieutenant Governor?
A That's correct.
Q Do you remember how many staff?

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

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

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

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

A Yes.

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

A Yes.

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

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

Q It was a working session?

A Yes.

Q And changes were made?

A Yes.

Q At the direction of Chairman Ralston?

A Speaker Ralston?

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

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

Q Somebody on the other side of the Zoom --

A Uh-huh.

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

A Yes. We would try different scenarios.

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

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

Q I see.

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

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

A Yes.

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

about how the map should look?
A Can you say that one more time?
Q Yeah. So the people on the other side of the Zoom call had opinions about how the Congressional map should look; is that right?
A Yeah. Yes.
Q Do you know how they developed those opinions?
A They did not tell me how they --
Q Okay.
A -- developed their opinions.
Q You just drew the map?
A Do the technical work, yes.
Q They instructed you on how to do it?
A Yes.
Q Was there a invitation for this Zoom call? You know how you -- I have Outlook, and sometimes I will get Outlook invi- -- Zoom Outlook invitations.
A I can't recall if there was one sent to me or if I created the meeting. I don't remember how that was set up.
Q But there is some invitation somewhere?
A I would -- yes, somewhere.
Q Okay. This might be a tough one, but do you remember what the meeting was called in the invitation?
A No, I do not.

Q That's fair. I get that.
And this meeting, was it just about the Congressional map?
A Yes.
Q Were there any other meetings like this working session?
A Where I was in a room and I was on a Zoom with other people, no, I don't think so.
Q Were there any other working sessions about how to draw the lines in the Congressional map?
A I don't recall a specific meeting. There were other meetings about drawing the Congressional map, not at the -- not in the same way this one was and not with the same people involved. Maybe smaller scale.
Q When you say there were other meetings about drawing the Congressional map, are you referring to the meetings that we talked about before with --
A Yes.
Q -- the chairmen?
A Yes, Chairman Rich, Chairman Kennedy.
Q Is this working session the only time you spoke with Speaker Ralston and Lieutenant Governor Duncan about the Congressional map?
A To my recollection, it is.
Q Is it possible there's another occasion?

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

Q Sure.

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

A I drew that map.

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

A No.

Q Did Brian Knight help you draw the map?

A No.

Q Did you speak with Brian Knight about the map?

A No.

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

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

A No.

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

A Can you clarify what you mean?

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

A No, I don't believe so.

Q Did you talk to Mr. Dan O'Connor about drawing the State Senate map?
A No.
Q Did he help you in any way with drawing the State Senate map?
A No.
Q Was he involved in any way in drawing the State Senate map?
A No.
Q The same question with Mr. Knight. Was he involved in any way with drawing the State Senate map?
A No.
Q How about Mr. Rob Strangia?
A No.
Q He wasn't involved in any way with drawing the State Senate map?
A No.
Q Mr. Strangia is the GIS specialist in your office?
A He is the GIS manager, yes.
Q And did you use Maptitude to draw the State Senate map?
A Yes.
Q So if he's the GIS manager -- does Maptitude use GIS technology?

A Yes.
Q So help me out how Mr. Strangia wasn't involved in drawing the State Senate map if the map was drawn with Maptitude and he's the GIS manager.
A So we could probably all have GIS qualifications if we were to do that, because it is all of us who use it. His role is more to oversee downloading software updates.
That was -- I don't know what that was. Something popped up.
Q Updates and then that sound comes on, yeah.
A Yeah.
He does a lot of the building some of the like layers that we use. He does work with the GIS program to build, say, the precinct layer and other things like that, but he doesn't actually draw maps at any time.
Q Are you drawing a distinction between using the data and the layers to draw the map and preparing the data and the layers for drawing the map?
A Yes.
Q And Mr. Strangia provided the latter for preparations?
A Yes. He works more on that end of -- of our office.
Q Did Mr. Knight help Mr. Strangia with that --

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

A No, I don't think so.

Q Did Mr. O'Connor?

A No.

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

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

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

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

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

Q And Mr. Strangia did that work?

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

Q And that's relevant to the Congressional map?

A It's relevant to all the maps.

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

step as well?
A No.
Q And that's the same for the State Senate map?
A Yes.
Q Did you -- what role did Mr. Tyson have in drawing the State Senate map?
A Mr. Tyson's role was as counsel for the redistricting process, so for all maps it would be the same consulting position.
Q You mentioned that you spoke with Chairman Kennedy and Rich and Mr. Tyson and Speaker Ralston and Lieutenant Governor Duncan and the staff about the Congressional map?
A Yes.
Q And there was no one else you spoke with about the Congressional map?
A Unless whoever staff was in that meeting. Specifically, I don't recall speaking with anyone else.
Q Is that the same group of people that you spoke with about the State Senate map?
A No.
Q Who did you speak with about the State Senate map?
A Well, the Senate would have been drawn by Chairman Kennedy, and that would be more specific to

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

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

A Uh-huh.

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

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

Q Sure.

A I don't recall.

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

A Yes.

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

A No. Senator Kennedy was involved in

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

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

A Yes.

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

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

Q You held onto the map in your office?

A Yes.

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

A Until it was ready to be published.

Q Is that the same with the Congressional map?

A Yes.

Q And the same with the House map?

A Yes.

Q And you know that Chairman Kennedy saw the map

because you were there when he saw it?
A Yes.
Q But you didn't -- you are not aware of any other senators seeing the map?
A Like I said, I know that Senator Gooch came in for a meeting. I recall that one. I'm trying to think through all the different --
Q Yeah.
A -- interactions that I had. I think Senator Walker came in at one point. This was near the -- before they made the map public.
Q Are you drawing a distinction between coming into your office to discuss the map and coming into your office to see the map?
A Kind of both things happened at the same time.
Q Okay. So when Senator Gooch came into your office --
A Uh-huh.
Q -- did he see the map?
A Yes.
Q And you guys talked about it?
A Yes.
Q The same with Senator Walker?
A Yes.
Q And the same with potentially these other

senators --

A Right.

Q -- who came to your office?

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

Q Yeah.

A -- triggering memories.

Q Totally get it.

A Yeah.

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

A Senator Kennedy would have been with them.

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

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

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

A Back me up.

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

A Right.
Q -- unless they give you permission to show maps to those particular senators?
A Right. A map would have an author. A map would have -- it would be their -- their map. So if -- to contrast that, when Aleda Butler submitted a map to our office and we worked with her on fine-tuning that, we didn't show that to any other senators unless she had said, you may show this to Senator Parent or some other senator.
We wouldn't do that with any map that any member works on, unless they either give explicit permission to do that or they're there with us and say, show them this map.
Q Got it. Thank you. That's helpful.
And when senators were looking at the map, was that in your office?
A Yes.
Q On a computer screen?
A Yes.
Q And did you have the ability to change map lines when you were doing that?
A Yes.
Q Did you ever change map lines when you were doing that?

A Yes.
Q With regards to the Senate map, how many times did you meet with Chairman Kennedy?
A I do not know.
Q Over 20?
A I don't know.
Q Over a hundred?
A I don't think it was over a hundred, but a significant number.
Q Around 50?
A I can't say specifically.
Q Okay. But we're pretty sure between 20 and a hundred?
A It was a lot.
Q Okay. Do you remember when you met with him?
A During the time period we were drawing these maps.
Q When was the earliest occasion that you met with Chairman Kennedy about the State Senate map?
A I could not -- I don't know.
Q August?
A We didn't have data until August the 12th, so any preliminary discussion before that would have been not helpful because we wouldn't know where the population growth, what the map is gonna look like, where -- where

we needed to make adjustments.

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

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

(Court reporter clarification.)

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

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

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

Q Almost every day?

A A good bit.

Q Yeah, yeah.

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

A Yes.

Q Any other ways?

A No.

Q Did you ever e-mail with him?

A I may have e-mailed him something at some

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

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

A Yes.

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

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

Q Sure.

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

A No.

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

A Initially, no.

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

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

Q So just so I understand, population data becomes available via the Census?
A Uh-huh.
Q You look at the population data?
A Uh-huh.
Q And then you create a blind map?
A Uh-huh.
Q Do you remember when you created the blind map?
A I do not.
Q August or September?
A It may have been October.
Q Okay.
A I'm not sure.
Q That's kind of late.
A It is.
Q Do you know why it was so late?
A I don't.
Q Were you instructed not to work on the map until October?
A I was not instructed.
Q You were not instructed to work on the map?
A I was not given any instruction at that point.
Q I see.
A I'm not heard.
Q You only work on maps when people tell you to

work on maps?

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

Q Is the LCRO part of the legislature?

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

Sorry. I will slow down.

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

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

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

A Correct.

Q Do you know why?

A I do not.

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

A It would have been Chairman Kennedy.

Q Was it in person?

A I don't recall.

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

A I drew the initial Congressional map you

referred to earlier, the --

Q Duncan-Kennedy?

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

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

A Yes.

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

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

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

A Yes.

Q What were they?

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

Q Did you take them into account?

A Yes.

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

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

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

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

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

A Yes. They had access to view it.

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

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

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

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

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

A Yes.

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

A Yes.

Q Was the blind map ever made public?

A No.

Q The blind map was a starting point?

A Yes.

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

A I don't know that I said that.

Q Maybe I misunderstood you.
So you made the blind map to start, and then you showed it to Chairman Kennedy?
A Uh-huh.
Q And what happened?
A I'm not sure who he discussed that map with, but as there were things to change in the map based on his conversations, then we would look at making adjustments to particular areas someone, you know, represented or wanted to continue to represent things to try and input into the map at that point.
Q Did Chairman Kennedy receive a copy of the blind map that -- you know, over e-mail or something? I'm trying to get at how he might have talked about the blind map with others but in specific ways without you being in the room.
A I don't recall printing anything or creating any PDFs of it. He may have just -- there I don't recall. He may have looked at it, known which -- who to talk to and -- I don't know.
Q Did he take notes about the blind map?
A I don't recall.
Q Do you recall if any of his staff took notes about the blind map?
A I don't recall his staff ever being in the

room.

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

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

Q In his role as counsel?

A Yes.

Q In any other role?

A That was his role.

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

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

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

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

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

A Not that I know of.

Q What kind of actions did Mr. Tyson take?

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

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

an objection based on attorney-client privilege.

MR. CANTER: Okay.

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

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

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

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

Q Who told you that?

A The chairman.

Q Chairman Kennedy?

A Yes.

Q Did Chairman Rich tell you that?

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

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

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

Q For all three. But Chairman Kennedy instructed

you about Mr. Tyson's role?

A I believe so.

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

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

Q And you had a lot of conversations with him?

A Yes.

Q A lot of conversations about modifying the blind map?

A We did have conversations about modifying it, yes.

Q Were those conversations ever in person?

A Yes.

Q Were they mostly in person?

A Yes.

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

A Not necessarily.

Q But sometimes?

A Sometimes.

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

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

Q Okay. And you know how to use Maptitude?

A Yes.

Q Was data projected onto the screen?

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

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

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

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

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

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

A Correct.

Q Was data related to the race of the populations

projected onto the screen?

A It could have been sometimes.

Q Most of the time?

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

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

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

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

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

A Can you explain what you mean by that?

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

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

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

A I don't specifically recall.
Q Generally, what type of questions?
A Like what you said, what if we moved this here or if this particular senator has -- you know, has a long-standing relationship with this county and would like to maintain that in their district, could we put that back, and if we do that, what would we -- how would we accommodate. Those types of things.
Q Do you recall if he ever asked questions about how changes in the lines would affect the racial composition of members of the districts?
A I don't recall specific conversations about that, but again, he would have taken that to counsel if he had discussions about whether or not what the percentage of those in the districts were.
Q When other senators came to speak about the blind map --
A Uh-huh.
Q -- would they see the blind map projected onto a screen, too?
A Yes.
Q But sometimes there had already been changes made?
A I can't say. The process is fluid.
Q Sure. At what point was there a determination

that the blind map was complete and ready for publication?

A I don't recall a specific date.

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

You were making changes to the blind map?

A Right. The initial draft, yes.

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

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

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

A Yes.

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

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

Q Did you make the changes and the adjustments?

A Yes.

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

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

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

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

A Senator Rhett.

Q So there was the map that was published first?

A Uh-huh.

Q And then Senator Rhett requested changes?

A Uh-huh.

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

A Yes.

Q And then another map was published?

A Yes.

Q Were there any other changes requested?

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

Q Why does it stand out?

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

Q Yeah. So why does that one stand out?

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

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

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

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

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

Q Right. Right. Okay.

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

Q Yeah.

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

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

A I don't think so.

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

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

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

A I don't believe that I did.

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

A Right.

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

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

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

look like?
A There was a lot of input everywhere.
Q And it was hard to look at all of it?
A Yes.
Q Right. You weren't able to look at all of it?
A I looked at a lot of it but not all of it.
Q Yeah. There was a lot you didn't look at?
A I don't know that I'd say there was a lot I didn't look at.
Q Okay.
A But I did watch or attend every public hearing.
Q Okay. We have just been talking about the State Senate map, and you described a blind -- I'm going to call it a blind map process. Does that make sense if I said it that way?
A Sure.
Q Yeah. I should back up. What was your role in drawing the State House map which Governor Kemp signed into law?
A It was the same as the House, or as the Senate and Congressional.
Q Okay. And did you use the same blind map process to draw the State House map?
A Yes.
Q Was Brian Knight involved at all in drawing the

State House map?

A He did meet with some members, yes.

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

A No.

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

A No.

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

A No.

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

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

Q How about before it was made public?

A No.

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

A For all of them.

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

A No.

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

the State House map as the other maps?
A Yes.
Q Was Ms. Paradise involved -- was Ms. Paradise also counsel?
A Yes.
Q With regards to drawing the State House map, right?
A Yes.
Q Did you speak with anyone in the General Assembly about drawing the State House map?
A Yes.
Q Whom in the General Assembly?
A In the House, you mean?
Q Yeah, I'm sorry. Whom in the House did you speak about --
A Yes.
Q -- drawing the State House map? Thank you.
A Chairman Rich. We did have a meeting with Speaker Ralston regarding the House map, and there were House members, House leadership in that meeting.
Q Do you remember -- oh, I'm sorry. I didn't mean to interrupt.
A Go ahead. I'm still...
Q Yeah. Do you remember what House leadership was involved in that meeting?

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

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

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

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

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

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

A Yes.

Q And you had a laptop?

A Yes.
Q Could the other members of this meeting see the map?
A Somewhat. Not easily, but some.
Q Did they have to look over your shoulder to look at the laptop?
A They did not look over my shoulder. They more asked questions and I could answer questions.
Q So during this meeting, they only asked you questions and you answered them about the composition of the map?
(Court reporter clarification.)
THE WITNESS: Yes. That's my recollection of the map.
Q BY MR. CANTER: Was that meeting in this building?
A No.
Q Where did the meeting -- where was that meeting held?
A In the Capitol.
Q Do you remember when that meeting occurred?
A I do not. That same time frame.
Q Late, late -- around October?
A Probably October.
Q Yeah. But the blind House map was drawn in

early October?

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

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

A Yes.

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

A A discussion.

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

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

Q How long was this meeting?

A Not very long.

Q An hour?

A Maybe an hour.

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

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

Q So --

A I don't know what meeting to --

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

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

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

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

A Yes.

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

A Yes.

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

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

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

Q But you weren't involved in those meetings?

A I was not.

Q Was anyone in your office involved in those meetings?

A No.

Q You just knew they existed?

A Right.

Q Would Chairman Rich mention them to you?

A Yes.

Q Sometimes specific meetings?

A Maybe.

Q Yeah.

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

A I'm -- whatever.

THE WITNESS: Patrick?

MR. JAUGSTETTER: Sure.

MR. CANTER: Thank you.

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

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

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

Q BY MR. CANTER: Hi, Director Wright.

A Hi.

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

A No.

Q With anyone else?

A No.

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

A Yes.

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

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

A No.

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

A No.

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

A Right. No.

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

A No.

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

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

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

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

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

A No.

Q -- the three maps?

You would not consider that --

A Not at all.

Q All right. Fair enough.

Was there anyone else in your office who was

involved in any way with drawing any of the three maps?
A No.
Q It was really just you?
A It was just me.
Q Okay. That's a lot of work.
A You are telling me.
Q So what was Mr. Knight and Mr. O'Connor doing during that period?
A We also were working a local redistricting that was beginning at the same time for counties, cities, things like that. Mr. Knight is our local redistricting coordinator, so that is part of his responsibility to oversee. We had two new staff members that were also working on that that he was helping train and teach.
Mr. O'Connor was dealing with members who requested information, maps. He does map requests, so he would provide from the current stuff and from the new Census data, information to people who requested it.
Q You mentioned that Mr. O'Connor was -- would you say communicating with members about map information?
A Sure, from the current maps that we were on at the time and the new Census data as it applied to those.
Q I see. So just so I understand --
A Uh-huh.
Q -- you had the benchmark maps. Is it all right

if I call the maps from 2010 the benchmark maps?
A Sure.
Q You had the benchmark maps, and then Census data came out?
A Uh-huh.
Q And members of the General Assembly, both the House and the Senate, had questions about how the Census data impacted their districts?
A Sure.
Q And Mr. O'Connor would answer those questions?
A If he was the person that they met when they came in. It could have been any of the staff.
Q But he wasn't assigned that role specifically?
A Not specifically.
Q Did any of those conversations when members would come in impact your decisions when drawing the maps?
A No.
Q Was there a decision at any time for you to be the sole and only person to work on the three statewide maps?
A A decision by who?
Q By you.
A Yes.
Q When?

A When it started.
Q Before the Census data came out?
A I -- I feel as though I was planning to do that if I was able to, dependent upon -- of course, Mr. Knight had to help with part of that map, the meeting with some members, because I was in a meeting on the Senate side at the same time. So it was my intent to try and do all of it to my abilities, within my abilities.
Q And why did you make that choice?
A Because I'm the director of the office. I have the most experience and that is my job.
Q Mr. Knight and Mr. O'Connor have worked at the office for some time, right?
A Yes.
Q And they have drawn maps before as well?
A Mr. Knight has.
Q Mr. O'Connor has never drawn a map?
A He does not do map drawing. That's not his work.
Q What is Mr. O'Connor's role within the office?
A He is a data -- redistricting data specialist.
(Court reporter clarification.)
Q BY MR. CANTER: And what does that mean?
A He likes looking at numbers and reports and historical trends and population figures, and he provides

that information as requested.

Q Why would someone request that information?

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

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

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

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

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

Q Right. Are you aware of that at all?

A No.

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

A I would not.

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

A No.

Q Okay. You mentioned that Mr. Knight does draw

maps?

A Yes.

Q What is his role within the office?

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

Q Yeah.

A -- right.

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

A Just the one meeting I mentioned with the House.

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

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

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

A Yes.

Q You mentioned that you were able to -- you

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

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

A Yes.

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

A Yes.

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

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

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

A Yeah.

Q You mentioned -- that's fair.

You had mentioned creating a blind Senate map

and a blind State House map --

A Right.

Q -- as a starting point?

A Right.

Q Did you create a blind Congressional map?

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

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

A It is possible. I don't --

Q Okay.

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

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

A You're asking if you asked me that?

Q Yeah.

A I think you've asked that.

Q Yeah, I wanted to confirm.

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

A No.
Q And are you aware of whether anyone asked Mr. Knight about data or information on the maps and he answered that once they were published?
A I have -- do not know what he has worked on.
Q Yeah. Yeah. You mentioned that you've had some conversations about the maps over Zoom?
A Yes.
Q You could do chat in Zoom, you know that?
A Yes.
Q Were any chats written down, communications completed during the Zoom calls?
A I don't recall using the chat during those meetings.
Q Okay. You don't recall using them at all?
A No.
Q All right. Was there any other sort of electronic communications, other than e-mail which we talked about, that you used to discuss or convey information about the maps?
A No.
Q It was -- okay.
We talked about drawing the maps and sort of providing information related to the maps with Mr. Knight and Mr. O'Connor. Is it the same answer with everyone

else in your office?
A Yes.
Q What about their presence at any of these meetings regarding any of the statewide maps? Were they present at any of the meetings you had with the legislators discussing it?
A No, they were not.
Q Are you aware that you are being deposed today in your personal capacity and also in a representative capacity for the LCRO?
A Yes.
Q Did you do anything to prepare for today's deposition?
A Yes.
Q What did you do?
A Reviewed current maps, documents, reports and things that are on our website. Reviewed the documents that were provided. I don't know what the method they were provided, but the large amount of documents that were sent.
Q Yeah.
A I did speak with counsel. Prayed.
Q Did you speak with any individuals other than counsel?
A No.

Q How many times did you speak with counsel?
A Two or three.
Q Recently?
A Yes.
Q How recently?
A Yesterday.
Q Okay. Unless, like I was just doing in the last segment, I specifically asked you to answer in your personal capacity, will you understand that moving forward, all of my questions are addressed to you in your representative capacity? Does that make sense?
A Yes, I understand that.
Q Yeah.
A But I also know that I operate in a staff of six other individuals that I don't have, you know, intricate knowledge of what each of them did and said on any given day, so...
Q Your knowledge is limited to your preparation?
A Okay.
Q Is that fair? Is that what I am understanding you to say?
A Preparation of for today?
Q Yeah. So I'll back up. As part of the subpoena that we sent related to deposing you in your representational capacity, there was a list of topics.

Are you aware of that?
A Yes.
Q Right.
A I think I saw that document.
Q So did you prepare for today's deposition in reference to being able to provide responses regarding those topics?
A Not specifically, no.
Q Okay. Okay. I guess I don't know how I'm going to literally mark this, but I would like to mark this document as Exhibit 1.
MR. CANTER: Patrick, would you like one?
MR. JAUGSTETTER: Yes, please.
MR. CANTER: And Bryan, would you like one?
MR. TYSON: Please. Yes.
MR. DAVIS: And I'm putting it on Exhibit Share as well.
MR. CANTER: Yeah, and it should be available over Exhibit Share as well. Yeah.
(Deposition Exhibit 1 was marked for identification.)
Q BY MR. CANTER: This is your declaration from the preliminary injunction hearing in different but related case involving the Georgia Congressional maps; is that correct?

A Yes.
Q All right. Did you write this?
A I've worked -- worked on it, yes.
Q Do you agree with everything that's stated in here?
A I think there were some typographical errors that I don't think were in my final version of it, and I'm not sure how that --
Q Fair enough.
A -- went across, but there were some things like that in it.
Q Okay. But the substance of this document you agree with?
A Yes.
Q This document reflects the responsibilities and activities of the LCRO, correct?
A Can you clarify what you mean by that?
Q Yeah. Page 1, paragraph 2, you have a description of the Legislative and Congressional Reapportionment Office?
A Yes.
Q And page 2, paragraph 3, you have a description of your role as the executive director?
A Correct.
Q Are these accurate?

A Yes.
Q At a high level, does the LCRO do anything which this document does not reflect?
A When you say "at a high level"?
Q I'm not asking you to go into the specifics, like 9 to 5.
A This is an overview of what we do, yes.
Q You mentioned that the LCRO is a joint committee -- I don't remember your exact words -- for the General Assembly?
A The joint office of the General Assembly, staff office.
Q Do you have a boss? And if so, who would be your boss?
A So the Legislative Services Committee makes decisions regarding the -- the joint office staffs.
Q I see.
A I -- that's typically who makes, like they have to -- certain approvals and things like that go through them.
Q So it's a committee within the legislature?
A Yes.
Q I see. And that's a joint committee?
A I think it's a joint committee, bipartisan committee, leadership.

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

A Yes.

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

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

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

A Okay.

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

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

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

A Yes, it's my understanding.

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

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

Q Do you know who he was counsel for?

A I don't exactly.

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

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

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

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

Does that make sense?

Q It does, yeah.

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

A I do not know anything about that process.

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

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

Q Okay.
A In the process by which we do other technical reviews, if that makes sense.
Q Okay. How about this, when you were drawing the three statewide maps --
A Uh-huh.
Q -- did you consider whether there were precinct splits present?
A Yes.
Q And by "precinct splits," do you mean state precincts as opposed to VTDs released by the Census Bureau?
A So to clarify, the VTDs that are released by the Census Bureau in Georgia do match our precinct layer. That layer is built based on our 20 -- and this current one is built off our 2018 precinct layer, so it does correspond to the same.
Voting precincts know we had a 2020 precinct layer that we had compiled following the 2020 election, but that was not completed in time to submit to the Census Bureau to be used as a VTD layer. So we kind of had both layers to use. In most cases -- a lot of the cases they were the same in certain counties, unless there had been a change in their precincts from 2018 to 2020.

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

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

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

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

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

A Yes.

Q Okay.

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

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

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

A Yes.

Q Did you make assessments?

A Yes. We worked with both files.

Q Did you analyze whether there were city splits?

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

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

A Yes.

Q How about municipality splits?

A A city and a municipality are the same thing.

Q Sometimes in California they are a little different.

A Not here.

Q Fair enough.

How about county splits?

A Yes.

Q And would county splits have been more

important than city splits?
A Yes.
Q How about comparing county splits and state precinct splits?
A County splits is most important.
Q Did your analysis include whether the districts were contiguous?
A Yes.
Q Did it include whether the districts were compact?
A I didn't run any kind of analysis on whether they are compact, but compactness I feel like is in the eye of the beholder, and that kind of is the consideration we take all along as we draw the maps.
Q You looked at the districts to see whether they were compact?
A Yes.
Q But you didn't, for example, use a Reock measure --
A No.
Q -- to determine whether they were compact?
And you didn't use a Polsby-Popper measure?
A No.
THE REPORTER: Use a what?
MR. CANTER: Polsby-Popper measure. I know.

It's two words. Two last names.

THE WITNESS: No, I did not.

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

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

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

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

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

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

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

same thing?

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

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

A Yes.

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

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

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

A True.

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

preserve existing majority-minority districts?

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

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

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

A Uh-huh.

Q Was there anything else that you considered?

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

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

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

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

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

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

Q Yeah.

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

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

A Yes.

Q What does that mean?

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

district in terms of the amount of population there.

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

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

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

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

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

Q Yeah. How about 45?

A Pretty strong.

Q 30?

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

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

A Yes, and we did.

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

A No.
Q It was a factor that you tried to keep in mind?
A Yes. And that would be not the primary factor as to maintaining the number of majority-minority districts that we had before and increasing those where we could. That would take precedence over whether there were the creation of an additional or an influence district or opportunity district would be a lesser objective.
Q You just referred to an "influence district" or an "opportunity district." Does that mean something different to you?
A I don't necessarily believe they are that different, in my interpretation.
Q Okay. I just want to understand.
A Right.
Q Yeah, okay. So those are the same in your understanding?
A Right.
Q Yeah, okay. Great.
As part of your review of the statewide maps that you drew, what did you do to ensure compliance with the U.S. Constitution?
A So the U.S. Constitution speaks to the congressional districts, I think, and equal population

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

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

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

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

A Yes.

Q What else did you do?

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

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

Q How did you get the incumbent addresses?

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

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

Q It was private information?

A Yes.

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

A No.

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

A No.

Q You just received the information you received?

A Yes.

Q You didn't ask my questions about it?

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

Q The report checks that you mentioned --

A Uh-huh.

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

A Unassigned Census blocks.

Q Unassigned Census blocks. Thank you. Excuse me.

A Like a piece that might have gotten missed.

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

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

A Right.

Q -- districts was noncontiguous?

A Right.

Q Okay.

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

Q Got it.

A -- like that.

Q Got it.

A That, too.

Q Thank you.

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

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

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

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

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

Q Yeah.

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

Q Yeah.

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

Q Okay.

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

Q I see.

A To look for noncontiguous pieces, things like that.

Q You are considering these through the whole process?

A Yes.

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

A Which factors?

Q Did you ever speak with Chairman Kennedy or Rich about split precincts?
A Yes.
Q About the compactness of districts?
A I'm sure we may have discussed that.
Q Yeah.
A I don't have a specific recollection. All of those were factors they adopted in their committee guidelines, so they knew that this was a part of what we were going to be considering when we worked through the maps as we drew them.
Q Did they ever mention these factors as a priority?
A They were all considered a priority. I don't think we discussed them in detail beyond the fact that this was what we were going to consider.
Q Did anyone ever mention that one of these factors was more important than another?
A I do not recall that being ever said.
Q Do you have an opinion if one of the factors were more important than another?
A I think you have to take all of those into account when you draw a map.
Q Okay. Are you aware that since the 2010 Census, the Georgia population has increased by around 1

million people?
A Yes.
Q And this increase is reflected in the 2020 Georgia Census results?
A Yes.
Q And the Census results include data broken down by race?
A Yes.
Q If I used the term "non-Hispanic white population" in reference to the Census, would you know what that means?
A Yes.
Q What does that mean?
A It means someone who filled out their Census form and marked their race as white and put that they were not Hispanic.
Q Are you aware that the non-Hispanic white population reflected in the 2020 Georgia Census has declined since the 2010 Census was published?
A Yes.
Q Are you aware that Georgia's population growth since the 2010 Census is due to an increase in people of color?
A Can you say that again? I'm sorry.
Q Sure. I'm sorry.

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

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

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

(Deposition Exhibit 2 was marked for identification.)

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

A Yes.

Q What is it?

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

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

A Yes.

Q Okay. And the LCRO generated this packet?

A Yes.

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

A Yes.

Q Do you recall drawing District 6?

A Yes.

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

A Yes.

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

(Deposition Exhibit 3 was marked for identification.)

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

Does that look right to you?

A Yes.

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

A You are asking about the prior District 6?

Q Yes.

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

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

for black voters?
A I don't know that because I don't know the demographics of what it was before.
Q Just to complete it, would your answer be the same if I asked about whether prior, the benchmark in Congressional District 6 was performing for Latino voters?
A I don't know the performance of the district before.
Q Just to make sure we're on the same page, if I use the word "performing," would that mean the same thing to you as an influence or opportunity district?
A I'm not sure. It depends on the context of what you are saying.
Q Right. How about this. When I use the word "performing," all I mean is what we were talking about before as an influence or an opportunity district.
A Okay.
Q All right. We were talking about what it means. Is that fair?
A Sure.
Q Would you agree that the new Congressional District 6 is not performing for black and Latino voters?
A Well, I have to look at the demographics of this in the packet that you handed me, but I think that

it is a different compilation than what it was before.

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

A Yes.

Q -- population statistics, and page 5.

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

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

A Right.

Q -- statistics about Congressional District 6 --

A Right.

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

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

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

A Then no, it would probably not be.

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

On what basis have you drawn that conclusion?

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

63 percent of the district.

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

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

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

A That's a very small number.

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

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

Q Understood.

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

A I have not done that kind of analysis.

Q You have never done a racially polarized voting analysis?

A No.

Q Okay. Do you think the new Congressional

District 6 is a performing district for the Hispanic population?

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

Q Not performing?

A Not performing.

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

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

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

A Uh-huh.
Q -- that has less than 20 percent of -- that is -- represents less than 20 percent of the district. Do you think that that population has an opportunity to elect candidates of their choice?
A You are saying if they vote as a block?
Q Correct.
A It would be hard.
Q Okay. I'd like to talk about the composition of CD 6 for a little while, if that's okay. Who told you to add Forsyth and Dawson counties to CD 6?
A I think on the draft map, initially Forsyth County had already been added into District 6.
Q Just to make sure I understand, by "the draft map," do you mean the Duncan-Kennedy map?
A I think it was on that. I'd have to go back and look.
Q Would -- and would that mean you put Forsyth into CD 6 as part of your blind redrawing?
A The initial map that we talked about for Congressional I had been given a list of possible places to try and adjust for population, and that may have been a part of that. On that first Congressional map that came out, the -- the Kennedy map --
Q I know what you're talking about.

A -- that.
Q Would it be helpful if we called that the blind Congressional map or --
A The September map might be better.
Q Then let's do the September map.
A I know when that one was.
Q Cool. Okay.
A Yeah.
Q So, you know, we can find that out. No reason to wonder.
MR. CANTER: Let's mark as Exhibit 4 the September map.
(Deposition Exhibit 4 was marked for identification.)
Q BY MR. CANTER: Director Wright, is this the September map? This is the September Congressional map?
A Yes.
Q Okay. And so looking at the September Congressional map, it looks like Forsyth was added, right?
A (No oral response.)
Q So did -- I'm sorry for rephrasing, just to make sure I remember, did you decide to add Forsyth on your own?
A I think it was on the e-mail list as

recommended to add to 6 on that.

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

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

Q Oh, I see.

A It was in the documents somewhere.

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

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

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

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

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

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

Q Politically electable for whom?

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

Q How was that information conveyed to you?

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

don't -- that discussion I think was had at some point.
Q Sorry. Sorry.
A I don't --
Q That question --
A -- have a specific --
Q Yeah.
A -- moment.
Q What makes it -- what makes it obvious to you?
A Forsyth County tends to vote Republican. It was a political decision.
Q If you are gonna add Forsyth County, you are going to have to take away something else. Is that right?
A Right. So as the map from the bottom -- of course, we have mentioned south Georgia's loss of population, those three congressional districts across the bottom, and I think even District 12 had a loss of population or were below in population. They had to reach upward. It sort of pushed the entire map. It did this on all three. The effects of that on all three maps pushed things northward.
So some districts around the middle and in the upper parts in the Metro area were gonna get shifted further up to where the population was. So the growth in population there added into District 6 also gave -- met

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

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

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

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

A It was on that initial draft.

Q The initial list --

A Uh-huh.

Q -- requesting information, right?

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

A Other than political reasons?

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

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

goal for District 6, so...
Q Ultimately in the passed map, Dawson was added as well?
A I'm sorry, can you say that again?
Q It looks like, when I look at the passed map, Dawson County was added on top of Forsyth.
A You mean passed, approved. I was wondering --
Q Oh, no, I didn't --
A -- when you said passed, and I was like --
Q I'm sorry.
A I was like, what, what?
Q I was told I need to stop that. Enacted?
A Enacted.
Q Yeah.
A Yes.
Q I'll --
A Yes.
Q -- rephrase.
Yeah. Ultimately the enacted map includes --
A Dawson.
Q -- Dawson County as well?
A That's correct.
Q Yeah. What was -- how did you get the direction to add Dawson County to the enacted map?
A That was discussed in the meeting we talked

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

Q So --

A -- was discussed in that meeting to increase --

(Zoom interruption.)

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

MR. JAUGSTETTER: Keep going.

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

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

A Yes, that's correct.

Q Do you remember who directed you to add Dawson?

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

Q Did he provide a reason?

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

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

screen during this conversation?
A Yes.
Q Was demo -- demographic data reflected on the screen as well?
A Yes. There would have been demographic, as well as political. I'm not sure how clearly they could see that from where they were and the way that it was projected, because I wasn't there with them, but it would have been on the screen for -- while we were doing it.
Q Do you know if there was data reflecting the race of citizens in the different districts on the screen? Was it racial data --
A What do you mean?
Q Yeah, was it racial data reflected on the screen?
A Yes.
Q Yeah, it doesn't mean you had demographic, yeah.
A Racial data, as well as political data.
Q I'm sorry. I might have misheard you.
A Yes.
Q Thank you for that confirmation.
Did you literally make the change to Dawson during that meeting?
A Yes.

Q And did the data change on the screen when you made it?

A The data would change when you --

Q Yeah, yeah.

A -- change the map, yes.

Q So the -- the members -- the participants in the meeting on the other side of the Zoom at least could have seen the changes in the numbers?

A They could have. The pending change box that shows up, I don't know if you are familiar with Maptitude, but it will only show the changing number while you have the selection highlighted.

Once you click that into the district or make that change, then it switches to the new. You then can't see the previous. You are not seeing both at the same time.

Q Yeah, no, I know what you mean.

A Yeah.

Q So when you were about to change -- when you were about to add Dawson to CD 6, you could see the racial composition of Dawson under the September map next to the racial compo- -- I'm sorry, the racial composition of CD 6 on the September map next to the racial composition of CD 6, or would it change --

A No.

Q Okay.
A It's going to show the two districts. So whichever district you are moving it out of and the district you are pushing it into, it's going to show the new number for what that would be if you moved -- if you --
Q Okay.
A -- clicked that, made that change.
Q So right before making -- right before adding Dawson into CD 6, they are able to see what the new racial composition of CD 6 would be?
A Right. They would see the new number. They wouldn't see the previous --
Q Right.
A -- at that point.
Q Yeah. But before adding that, you would have seen the previous --
A Right.
Q -- composition? Okay.
A You could have, yes.
Q Yeah, yeah, if they looked.
A If you are looking, yeah.
Q Yeah, right. And then you click it, and it's added?
A It switches.

Q Yeah.

Was the discussion just, let's add Dawson, or was there anything more specific about that? It looks like the entirety of Dawson County was added.

A Yes. We moved -- both those two counties were in -- added in whole. Of course, trying to divide counties was not -- as we talked about earlier, it poses problems with elections and whatnot, so trying to limit the splitting of counties.

I think there was discussion about the fact that Georgia 400 runs up through that district, so there is a common road traveling through there, as far as those areas being together, but the -- there was a lot of discussion going on. Again, I wasn't in the room, so it's...

Q Could you hear what was in the room?

A I could, but again, I'm looking at other things while they are discussing --

Q I see.

A -- what they are doing.

Q So based on your knowledge -- I understand you couldn't necessarily hear everything, but based on your knowledge, was there any other factors that were considered in the room when deciding to add Dawson County to CD 6?

A To my recollection, adding Dawson to CD 6 had to do with the political numbers of the district. That was the only thing.

Q Okay. You just mentioned that you try hard to not cut counties. Is that right?

A Correct.

Q I see the new CD 6 cuts right through Cherokee. Is that right?

A Yes.

Q Did I pronounce it correct?

A Cherokee.

Q Yeah. When was the decision made to add this portion of Cherokee County to CD 6?

A I think that was a part of that meeting as well. We were working on the shape of District 6 --

Q Okay.

A -- and the political performance of District 6.

Q Who asked that this portion of Cherokee be added to CD 6?

A I don't recall.

Q But it was someone that was in the room?

A Right. As we were making adjustments in that area to District 11 and District 6, that I think we were able to put Bartow County back together, it previously had been split before, but then population-wise required

that splitting in Cherokee. There was a lot of movement in making adjustments in those two districts in that area during that meeting.

Q Yeah. Can you help me out? Can we go to the September map for a second, just -- oh, I see. Bartow County was split in CD 11 in the September map?

A Right.

Q But when you added Cherokee to CD 6, you were able to keep Bartow County whole --

A Yes.

Q -- in the passed map?

A Right.

Q Okay. The -- the line that cuts through Cherokee --

A Uh-huh.

Q -- right, it's kind of jagged?

A Uh-huh.

Q Right?

A It's a river.

Q It's a river. Okay. So it follows the river?

A That's -- yes. The precinct lines there follow the river, and so, therefore, it's following the precincts, which is, I think, follows the river.

Q Great. Thank you for that.

A Uh-huh.

Q It looks like a portion of Cobb County was taken out of CD 6. Let me rephrase the question.

I'm looking at the side-by-side map right now.

A Okay.

Q I think it's helpful right now. And I see in the benchmark CD 6, there is more Cobb County than in the enacted CD 6?

A Uh-huh.

Q Do you recall taking a portion of Cobb County out of CD 6?

A Specifically, no. As I said, we were doing a lot of movement in that area on the map. And again, the push of population does impact what -- where those lines are drawn. I don't specifically recall --

Q Okay.

A -- what we did, you know.

Q Do you think that you made that change regarding Cobb County and CD 6 during the working session that we've been discussing?

A Cobb County was divided on both of the versions from September. In CD 6 it had been -- even before that, I think it was split. So that area had always been a portion of District 6; it had always been divided. So it's a similar line on all three versions. I mean, if you look at -- I'm trying to remember which. This is the

prior.

Q Yes.

A So this would have been the benchmark.

Q Yeah.

A And then this is the September. All three, that same East Cobb area is in District 6. So to give you the specifics of how many people moved one or the other in that area, I don't know.

Q Got it.

Some portion of CD 6 -- well, let me back up.

You added a portion of Cherokee, all of Forsyth, all of Dawson into CD 6 for, ultimately, the enacted plan?

A Uh-huh.

Q Adding more people, you've got to take some people out. Was there any discussion about where you were going to take people out?

A So I think that had been done on the September map when we moved District 6 out of North DeKalb.

Q I see. So was the decision to move -- remove a portion of DeKalb from CD 6 made in the e-mail provided to you from Chairman Kennedy's staff?

A I believe that it did say to shift 6 out of DeKalb and up into Forsyth, so yes.

Q Do you recall any other directions from Chairman Kennedy's staff about the composition of CD 6?

A Not specifically, no.

Q Do you remember any other discussions about CD 6 during -- about the composition of CD 6 during the working session that we've been talking about?

A Yes. There was discussion about a proposed -- or a candidate, a potential candidate in District 6 that where that person lives and something about that person.

Q Do you remember the potential candidate?

A I'm trying to remember his name.

Q It was a he?

A It was a he.

Q McCormick?

A No.

Q But it was a potential candidate that you wanted to keep in CD 6?

A That they wanted to not have in CD 6. But, of course, candidates for Congress don't have to live in the district anyway, so...

Q Did you talk to anyone who either is in Congress or who -- actually, I won't make -- break it down. Did you talk to anyone in Congress about the composition of CD 6?

A Did I talk to anyone in -- say that one more

time.

Q Yeah. Did you talk to any congressional representatives about the composition of CD 6?

A About 6, specifically 6, no.

Q Okay. But you talked to congressional representatives about some other portions of the map?

A I did speak with a member of Congress about the maps, and this was at the beginning before there were proposed maps produced, yes.

Q Which member?

A Sanford Bishop.

Q Is there anything else about -- did you receive any other directions than what we discussed about the composition of CD 6?

A I think that the portion that went into Gwinnett was something requested from Chairman Rich on the final version.

Q Oh, oh, I see, the portion in the north part of Gwinnett?

A Yes.

Q Do you know why Chairman Rich asked to have that portion?

A I think she has connections to that area, so I assume that's why, but she didn't specifically tell me that.

Q Was that decision also made during the working session?
A Yes.
Q And just so that we're clear, the same data was reflected on the image -- on the screen for the people in the room to see, for all the changes made to the map?
A So the pending change box --
Q Yeah.
A -- only shows one district at a time --
Q Right.
A -- if you select it, and then it will show a second district as you start to move it. That's typically what was left on the screen, not a full data view.
Q I got it. So that's -- that's a fair point.
But is it -- is it true that whenever you were focused on a district there was data reflected on the -- on the image as well?
A Most of the time, yes. There could be a time I've hidden the window for a reason if I'm doing something else, but...
Q But unless there is some specific reason, you were always keeping data reflected on the image on the screen so that they -- the worker -- the people that are working on the maps with you can see the data

composition?

A Right. They would see the pending box, not the -- the full data view. That takes up a lot of space on the screen. So the pending box would have been there.

Q They would see how changes you have made to the map impact the data composition?

A It's much more difficult to look at the pending change box and then know. Because, as you know, looking at this, you look at one map and then you have to look back because you don't remember what you just saw. So it's a lot harder to do that. It doesn't show all of that data at one time for you to be able to say, it was this and now it's this.

Q Yeah.

A Does that make sense?

Q Yeah.

A So it's after the fact is easier to go back, if you want to do that sort of analysis and look at numbers in a population summary report or in a data view, in another method. It's much harder to do that while you're watching it on the screen.

Q After the working session, did you provide printouts or data reflecting the -- comparing the new -- the composition for the plan that you had just prepared versus the prior version?

A I don't recall providing that in that particular way, and I don't recall if there was any changes made to the map after the working session or if that was the very final one. I -- I don't want to say and speculate if there was anything else added or changed after that.

Q So it's -- it's possible that there are more changes made to the enacted Congressional map after the working session?

A It's possible.

Q But you think it probably isn't the case?

A I can't recall.

Q Okay. The vast majority of the changes were made during the working session?

A I think the vast majority of the work on that map was complete during that session.

Q And to be clear, I mean the vast majority of the work changing from the September map to an ultimately enacted occurred during the working session?

A Right. I believe there were several options, which you would have gotten in discovery, of draft maps in between the two, that we looked at different possible adjustments. Those should have been provided, I'm sure with all of that, but that was all the same base map to this map. It may have overlapped in terms of what was

included, different things, trying different things.

Most of the time I wouldn't zero out a map when I finalize it until we've settled on -- because it's a very tedious process, until they've mostly settled on what they want the map to look like.

Q Do you know who was the representative for the benchmark CD 6?

A Yes.

Q Whom?

A Representative Lucy McBath.

(Court reporter clarification.)

Q BY MR. CANTER: Do you know Representative McBath personally?

A No.

Q Do you know that she's a black woman?

A Yes.

MR. CANTER: How long have we been going?

THE VIDEOGRAPHER: Over an hour.

THE WITNESS: Seven hours.

MR. CANTER: I think that this might be a good time to take another break.

MR. JAUGSTETTER: It's a quarter to 12:00, Jacob. What's your anticipation for lunch, because I don't want to take a break now and then take another break for lunch?

MR. CANTER: We can go off the record.

THE VIDEOGRAPHER: The time is 11:44 a.m. We are going off the video record.

(The deposition was at recess from 11:44 a.m. to 12:56 p.m.)

THE VIDEOGRAPHER: 12:56, we are back on the video record.

Q BY MR. CANTER: Hello, Director Wright.

A Hello.

Q During the break, did you speak with your counsel about the subject or the contents of this deposition?

A No.

Q Did you speak with anyone else about the subject or contents of this deposition?

A No.

Q If you recall before the break, we were discussing the enacted CD 4; is that right?

A 6.

Q The enacted CD 6, excuse me.

A Yes.

Q Yes. Dawson County was added to CD 6. Do you know the racial composition of Dawson County?

A No, I don't, not specifically.

Q Do you know the racial composition of Forsyth

County?
A Not specifically, no.
Q Would you agree that Dawson County is majority white?
A I believe that to be true.
Q Would you -- would you agree that the vast majority of Dawson County is white?
A How would you measure vast?
Q More than 70.
A That very well could be true. I don't -- again, I don't know the demographics.
Q Sure. But based off your experience as a demographer, you're pretty sure it's more than 70?
A I would think it's around that at least.
Q Would you agree that Forsyth County is majority white?
A I believe that to be true, but I'm not sure of the numbers again on that one either.
Q Still pretty high?
A Probably pretty high.
Q Would you agree that Cherokee County is majority white?
A I believe that's true.
Q Do you know whether the portion of Cherokee County that was added into CD 6 is majority white?

A I don't know the demographics specifically.
Q Would you agree that the portion of Cobb County that was taken out of CD 6 is majority people of color?
A Again, I'd have to look closely. The areas are very similar, so you are looking at a few precincts, and I don't know the demographics of those precincts specifically.
Q The last one is, would you agree that the portion of DeKalb County taken out of CD 6 is majority people of color?
A I don't know that to be true either.
Q Okay.
A DeKalb.
Q DeKalb, thank you. DeKalb County.
A Sure.
Q Now, looking at those changes to CD 6 in totality, adding in Dawson and Forsyth counties, taking out Cobb and DeKalb counties, would you agree that this -- these changes make CD 6 more white?
A I would have to look at the data to verify that. I'm not 100 percent sure that they do.
Q Do you have a sense right now?
A I have no reason to think that you're wrong based on the demographics of the counties that were added in, so that's probably true.

Q Okay. Okay. Do you know if Lucy McBath was the candidate of choice for voters of color?

A Voter -- I don't know where. I don't know. In what --

Q Sure.

A -- election?

Q Do you recall that Representative Lucy McBath represented CD 6 from 2020 to 2022?

A Yes.

Q Do you know that in the -- whether in the 2020 election Representative McBath was the candidate of choice for people of color?

A I don't know. She was elected from the voters in District 6. I don't know the demographics of what that district was at that time, so I can't speak to whether that was voters of color or just the voters of the district.

Q Can you go back to, I think it was Exhibit 2, which is the enacted Congressional map. And you see that CD 4 is next to CD 10?

A Yes.

Q All right. And if you go to page 2, you have a blowup of CD 4 next to CD 10, right?

A Yes.

Q Did you draw the lines that separated CD 4 from

CD 10?

A Yes.

Q Do you remember drawing those lines?

A Specifically, no.

Q Okay. Okay. Do you see Oxford is right at the edge between CD 4 and CD 10?

A Yes.

Q I'd like to pull up an exhibit on Exhibit Share, so it should pop up on your computer.

(Deposition Exhibit 5 was marked for identification.)

MR. DAVIS: I'm going to share my screen, so you should be able to see it on your screen in a second here.

MR. CANTER: He's loading it.

MR. DAVIS: Okay. Can you see something on your screen? I'm going to make it bigger for you.

THE WITNESS: Yeah, I see something.

MR. DAVIS: I will make it bigger. There we go. Is that -- can you see anything?

THE WITNESS: I can see red outlines with blue, red, gray.

MR. DAVIS: Great. We can zoom in. If you want us to zoom in at any point, just let us know, please.

THE WITNESS: Okay.
Q BY MR. CANTER: So I'm going to describe the image on the screen right now.
A Okay.
Q The blue line represents the congressional district line.
A Okay.
Q Below is CD 4. Above is CD 10.
A Okay.
Q Does that make sense?
A Yes.
Q The gray box is the city of Oxford.
A Okay.
Q So if you recall from Exhibit 2 we just looked at, it's right around where I was pointing to.
A Uh-huh.
Q Right? The red lines are the state precincts.
A Okay.
Q Does that make sense?
A Yes.
Q Okay. Have you ever -- have you ever looked -- when you -- how about this. When you are drawing maps, do you ever look at the map this zoomed in on an area in the state of Georgia?
A Yes.

Q And why do you do that?
A There could be a lot of reasons why you would zoom in.
Q Sure. Can you describe some of the reasons why you would zoom in?
A Oh, well --
Q Yeah.
A -- I mean, on a Congressional map, we try to use whole precincts where we can, but because you have to draw them to as a population, or we draw them to a population of zero deviation, you are going to have to zoom in down to block level to get the correct numbers of population so that you can have that deviation to that -- that tight range.
Q Okay. So you testified earlier that an important goal for drawing is to not cut state precincts?
A Right.
Q And one of the reasons you provided was that it's administratively difficult --
A Uh-huh.
Q -- for the election administrators?
A Yes.
Q Can you describe why it's administratively difficult?
A So when an elections official assigns voters a

ballot in a split precinct, they have to create a combo for the unique district combinations in that precinct, unless they change their precinct lines, meaning the voters that are in one district have one combo that reflects that in the other district assignments that they are in; and voters that are in that same precinct that have a different district assignment would require a different combo, so that they receive the correct ballot when they go to vote.

Q Okay. Now, if we look back at this image and we look at how the blue line cuts through the city of Oxford --

A Uh-huh.

Q -- it looks to me like that line is cutting through the state precinct; is that correct?

A That looks to be, yes.

Q How would, on a sort of technical level, you accomplish drawing a line that cuts through a state precinct?

A What do you mean how would I accomplish it?

Q So you drew -- you drew this line so that CD 4 and CD 10 have this composition, right?

A Right. So drawing is clicking with a mouse, not drawing.

Q Yeah, yeah. Fair enough.

A Okay.
Q So when you are clicking with a mouse to create the line between -- I'm going to say it's between CD 4 and 10, because that's what we are looking at. What do you need to do to draw -- to create a line that cuts through a precinct? Is it a different process than creating a line that goes along a precinct?
A So you'd select which type level of geography you are using for what you are clicking on.
Q Sure.
A You can click on the larger geography. You can click on counties. You can click on precincts or voting districts. You can click on Census blocks. When you get down to this level, you would be clicking on Census blocks.
Q Please go on.
A At that level. And that's the level you would be at so that you would know, because you are trying to reach that perfect ideal district size, finding the right combination of the population in the Census blocks to achieve that.
Q You would -- and just so I understand, you would have to be at the Census block level in order to draw a line that cuts through a state precinct?
A Say that one more time.

Q Would you have to be at the Census block level layer in Maptitude in order to draw a line that cuts through a state precinct?

A So if the next level of geography we would use would be the block, so between the precinct, the block, there's not an in between level. So if you are going from precinct down to the block to a smaller level, then block is what you would use --

Q Yeah, okay.

A -- I think is what you are asking.

Q Yeah, that's all I'm asking. That you were -- in order to draw a line that splits a precinct --

A Uh-huh.

Q -- you have to be at the block level to do that?

A Right.

Q Right. Okay. And that means you have demographic data at the block level?

A The blocks contain all of the different levels. The geography contain the data, so yes.

Q Right. Can you describe the block level data?

A It's the same data that's in all of the different levels of geography. It has all of the Census fields in it, the Census block fields, breakdown of the demographics and whatnot.

Q So is there racial data at the block level?
A Yes.
Q All right. Is there any other type of demo -- data at the block level?
A So when we build our precinct layer, we do allocate the election data to the block level, so we have that political data at that level. It's estimating, based on the demographics in there, based on registered voter demographics kind of corresponds the two and allocates down to that level. So we do have estimate political data at the block level when we do this.
Q When you are drawing a map and you are looking at the block level --
A Uh-huh.
Q -- is data reflected on the screen?
A Yes.
Q And is the estimated election data on the screen with the other data?
A Yes.
Q You agree that the line we're looking at here splits through the precinct, right?
A At the time, Newton County was considering precinct changes. We were working with several -- their elections office, and we had a draft precinct layer that they were considering, so it's possible that I referred

to that at that time. I think I was able to get them -- well, we did have a meeting in order for me to explain the midst of -- being in the middle of changing districts would be a very challenging time to change their precincts, but it's possible that I did look at their pending precinct layer that they chose not to adopt at that time.

Q There's a college in Oxford, right?

A I don't know.

Q Okay. Would splitting a college be splitting a community of interest?

A It could be defined as such.

Q Okay.

A We don't have information on college campuses, though, in our system to show us where those defined boundaries are. And we did bump into that at a public hearing from another college, who questioned the same thing. And in their case it had to do with the precincts dividing the campus. We were holding the precincts and, therefore, it split the campus. But without being given that information to define those communities, it's very hard to know where that would be defined -- what that would be defined as.

Q You mentioned earlier that sometimes you need to split precincts in order to meet deviation

requirements?

A Yes.

Q Do you recall why you split this precinct?

A I do not. Population -- I'm sure it would have been population based.

Q Do you know the racial composition of the precinct that is split on this image?

A No, I do not.

Q When you were discussing drawing the Congressional map, did anyone ever ask you to split a precinct?

A In specific terms, no; but knowing that to get the deviations to zero, I think that was known that that would be the way that you would achieve that.

Q There was an understanding that as a consequence of some of the requests, precincts would need to be split?

A No, not as a -- not as a consequence of the request, but as a consequence of getting the deviation to a perfect zero deviation, it would be virtually impossible to go through the map -- and I haven't tried it -- but to try and draw a zero deviation map without splitting a precinct.

Q Okay. Do you remember talking -- do you remember the working session we were talking about

earlier today?
A Yes.
Q About the Congressional map?
A Yes.
Q Do you remember talking about the line that separated CD 4 and 10 during that working session?
A No, I do not.
Q At any other time, do you recall communications or requests related to drawing the line between CD 4 and 10?
A I don't remember conversation about the line. In that area, there was a question about an address at one point. I don't remember where it fell and whose it was, but that's the only thing I remember about that area.
Q When you say a question about an address, would that be an incumbent address?
A I don't know whose it was.
Q Okay. Just a question.
How often were you looking at the block level when drawing maps?
A I don't have an answer for that. It varies.
Q Would it be fair -- would it be fair to say that you looked at the block level a lot?
A When you get to the point of where you are

trying to finalize a map is when you're -- the Congressional map, is when you are going to look closely at the block level to try and balance that population. It's very difficult to zero out a map.

Prior to that on a Congressional map you probably would not -- I would not have been looking at the block specifically that much.

Q You look at the block level more often on the State Senate and State House maps?

A The smaller the district size is, the more likely you are to look at the block layer, because you are trying to achieve a smaller-sized district, so more with the Senate map.

I think if you look across county splits and precinct splits, you will see that the -- you have less of them as you get into the bigger districts, because you select by larger geography, so...

Q What is the -- would you -- so what is the geography that you looked at most often when drawing the Congressional map?

A It would depend on the part of the state that you are in.

Q How about the part of the state where CD 6, CD 10, and CD 4, around that is located?

A What was the original question?

Q What is the block level -- I'm sorry, what is the layer that you look most often at when drawing in that area?

A Probably the precinct layer, precincts VTDs, those two.

Q When I say that's one up, does that make sense, from the block layer?

A Right, it's a step larger.

Q Yeah, right. And it's a single step larger?

A Yes.

Q Did you also have all of the Census data available to determine the effects of changes at the precinct level?

A You mean the pending change --

Q Yeah.

A -- box? Yes.

Q And was all the demographic information related to that Census data reflected on the screen?

A Yes. I typically kept the same data on the pending change box when I worked on these maps, which would include the -- the demographics, as well as the political.

Q Was the same estimated election data available at the precinct level?

A At the precinct level, it's not estimate. At

the precinct level, it's accurate because that is the format in which we receive that data.

Q And can you remind me where that election data came from?

A It comes from the Secretary of State's Office.

Q Does it come from the reapportionment report?

A I don't know the name of the report that it comes from.

Q Okay. But you receive it from the Secretary of State's Office?

A Yes.

Q Is there a process for receiving that material?

A Yes.

Q What is the process?

A We usually wait until after the general election in any given year is passed. What we want to do is make sure that the precinct boundaries that were used for the election are the final boundaries. Counties do have flexibility to change those lines somewhat close to an election, so we want to make sure what is used is what we have in our system, the correct boundaries.

And then after that, we request the information from the Secretary of State's Office in the format that we need to import into our system.

Q Would Rob -- I'm sorry, Rob Strangia?

A Strangia.
Q Strangia be the one obtaining this information?
A Yes.
Q And is it a regular process after every general?
A Yes.
Q And you used the data from the Secretary of State's Office to get election results at the precinct level and to prepare estimated election results at the block layer?
A Yes. I mean, all of it is built into our precinct layer, so it's --
Q Right.
A -- part of one file.
Q What is one layer up from the precinct layer?
A The county.
Q You also have Census data at the county layer?
A Yes.
Q You also have the same racial demographic data?
A Yes.
Q What is your performance data at the county layer?
A It's the same file that we would obtain.
Q Okay. But now aggregated?
A Right, to -- to the county.

Q What is one layer up from the county layer?
A There is not one layer up from the county layer.
Q That's it?
A Multiple counties --
Q Okay.
A -- in the state.
Q Do you -- fair enough. How about this, do you have a layer that is larger than the county layer?
A Just the state.
Q The state?
A Uh-huh.
Q So when you are drawing a map, there is four layers. There's the state, the county, the precinct, and the block?
A Well, there's a lot more layers than that, but --
Q Okay.
A -- those are four of the layers.
Q What -- high level, can you describe some of the other layers?
A It would be city limit layer, street layer, power line, pipeline, water areas, highways and interstates. I'm trying to think of other geographic. There is other geographic features, but that's probably

most of them.

Q Okay.

A Historical precinct layers, we would have those that come into the file. Other things that are part of the Census within our system, the TIGER files that come in. All the different TIGER files that come with the Census geography.

Q You mentioned earlier that you don't have a way to quantify communities of interest?

A Correct.

Q So none of these layers you mentioned would, in your understanding, reflect communities of interest?

A Correct.

Q Just so I understand, what's a TIGER file?

A That's the name for the -- it's a Topographic Integrated Geographic, something around there. That's what the Census Bureau geography files are called. I'd have to look up what the letters stand for.

Q Sure. That's fine. You don't need to.

When you were looking at the Congressional map with the working session, would you reflect different layers of the map?

A Reflect in what way?

Q I'll ask a different question.

When you are at the working session, did the

1 people on the screen ever see the block level, the block
2 layer -- block level layer, how about that?
3 A It's possible.
4 Q All right. Did they ever see the precinct
5 level layer?
6 A Yes, I'm sure.
7 Q Did they ever see the county level layer?
8 A They're usually all turned on, other than the
9 blocks until you zoom in.
10 Q They're all -- so at the working session, you
11 recall that the county and precinct level layers were
12 turned on?
13 A I'm sure that they would be. I wouldn't have
14 been working at -- at that level if we were zoomed in, as
15 you questioned about District 6. We would have been
16 working with, most likely, precincts in that area. I
17 don't remember what I have turned on at any given time,
18 and when you zoom in the map, you do alter, you know, the
19 layers that are on so that there's clear visibility for
20 what you are looking at.
21 Q I recall you saying that there was a decision
22 to move -- sorry -- Dawson into CD 6 during the working
23 session?
24 A Yes.
25 Q So when they decided -- when the data showed up

about Dawson moving into CD 6, they would see data related to the precinct layer and to the county layer?

A It would depend if I had that turned on. But it wouldn't show a breakdown of the precincts, if that's what you are asking.

Q Yeah, that's what I am asking.

A It would not show that.

Q Okay. You would have to -- how would that be -- how would they do that? You would have to be zoomed in more to show?

A Well, the data -- the data is not going to show up like on the map when you are looking at it, unless you've got all of that turned on, which is usually too busy --

Q Yeah.

A -- for anybody to look at. So any questions about that would have to be something that would be manually produced --

Q Okay. Okay.

A -- through the software.

Q So when you are looking -- when they are asking for changes -- when they ask for you to add Dawson into CD 6 --

A Uh-huh.

Q -- they are looking at county level data?

A Yes.
Q And they probably weren't looking at precinct level data?
A Probably not.
Q Okay. Can you go back to Exhibit 2, and you can stay on the second page. And do you see that CD 14 shows up on the second page?
A Yes.
Q Did you draw the lines for CD 14?
A Yes.
MR. CANTER: I'm going to hand to the court reporter what I'd like to mark as Exhibit 5 (sic), I believe.
(Deposition Exhibit 6 was marked for identification.)
Q BY MR. CANTER: Director Wright, this is another document which reflects on the left the benchmark CD 14?
A Uh-huh.
Q And on the right the enacted plan CD 14. Does that make sense?
A Yes.
Q Do you -- and I think you can also see this in Exhibit 2, but do you see the enacted CD 14 adds a little piece on the bottom southeast?

A I'm sorry, where?
Q On the bottom southeast.
A Yes.
Q And this bottom southeast addition includes the cities of Austell and Powder Springs?
A Yes.
Q Do you know that Austell and Powder Springs are both majority people of color cities?
A I do not know the specific demographics of those cities, but...
Q Would it -- does that make sense to you, I mean, based on your understanding of the demographics of that area?
A Sure.
Q Okay.
A But the cities themselves are not in their entirety the area that was taken in. They are just a portion of it.
Q There are -- I just want to understand what you said. There are other portions of this addition to CD 14 that are not Powder Springs and Austell?
A Correct.
Q The majority of the addition, though, are those two cities?
A I don't know what the population of the two

cities are in relation to the population of that entire area, but...

Q Okay. But at least --

A They are -- they are included in the area that was added into CD 14.

Q Right. They are certainly part of it. Okay.

Would you say that -- I'm going to call this just the addition, the southeast addition. Does that work?

A Sure.

Q Would you say that the southeast addition can be justified based off of compactness principles?

A Based off compactness principles, I don't think it makes a huge change in the shape of the district.

Q Okay.

A It's a small area.

Q Would you say that adding the southeast addition can be justified based off of respect for preserving communities of interest?

A In terms of keeping two cities wholly within that district, they were maintained and not divided into any other districts, so if you consider that a community, they were maintained in one district.

Q What about adding an urban community into a district that is primarily rural?

A I'm sure there are places on the map where that happens, but this decision to draw this in this area was above my -- my level.

Q Okay. Let's talk about that then.

A Go right ahead.

Q Why did this piece of CD 14, why did the southeast addition get added to CD 14?

A Sure. So the push from the south part, as we've talked about population wise, impacted the other districts that border up against it. So we already had removed Haralson County out of 14, and Pickens County also, as you know, had requested quite vocally to be wholly within one district and not be divided. So the decision was made then to push Pickens into a different district and keep it wholly together.

And there was still a need for District 14 then to have population. Because the size of District 13 is what -- it was not modified very much at all. It did lose part of Douglas County and a little bit of Cobb. That population needed to go elsewhere. And politically putting that area into District 11 was not beneficial to the performance, as you talked about, for District 11, so it was decided that it would go into 14. That area voted, I think around 60 percent democratic, so that was the reason that it was chosen to be pushed into 14.

Q That was a lot of information.
A There you go.
Q When was that -- when was the direction conveyed to you?
A That was part of that working session.
Q All right. Do you remember who conveyed that direction to you?
A I do not specifically. It was discussed.
Q And were all of those factors that you just brought up discussed?
A Yes. I think that was part of what led to -- to that idea.
Q I see. And I know you just said you don't recall who specifically made the direction, right?
A Right.
Q But did you have any sort of opinion about making this change?
A Well, I mean, I understood their justification for their -- that was the political goal that they had, and I work for them, so, you know, my opinions are not...
Q I -- okay. Though it seems like you might, in fact, have an opinion.
A Well, counties are -- larger counties are going to be split on these maps. We know that. And it is always better if you are going to split, split within a

larger county than to go and split another smaller county. So putting Pickens back together was definitely a decision I felt like was a good choice. They requested that. Let's do that. It made sense to the map, and it -- it fit into where everything else laid out.

This particular area, that was not my decision. They made that decision, and I do what I am told.

Q Okay. So you said that it made sense to keep Pickens whole?

A Yes.

Q Would it be fair to say that you didn't think it made sense to take this piece of Cobb?

A Well, no. I will say that it is -- when you are splitting and dividing between districts, larger counties are going to already be split. So rather than cause a county that is much smaller to have to have two different combinations, two different congressional districts, especially when they requested specifically to have that reversed from how it had been, putting that county back together was a more logical choice than including an additional split in another county that's already split.

Q You -- I think you just said that putting Pickens back together so that it's not split --

A Uh-huh.

Q -- was a logical choice if the consequence would be to split Cobb, which already was split?

A Correct.

Q So it was a good idea in this circumstance to split Cobb into four?

A There were the political justifications for why they chose to do that. That's the reasoning behind that split, why that was put into the 14th District.

Had they chosen a different route, that particular area, as I said, was a strongly democratic voting area, and putting that into the 11th District would have reduced the Republican numbers in the 11th District. The 14th District was a stronger Republican district, so therefore, adding that democratic area into a more Republican performing district was not going to make as big of an impact on the 14th as it would on the 11th.

Q And those were political considerations that you were -- that were conveyed to you?

A Well, yes, that was what the -- you can look at the numbers in the data and see.

Q But you're -- you're a demographer, right? Or you draw maps a lot, right?

A I've been called that, yes.

Q Yeah, yeah. Yeah, you draw maps a lot.

As someone who draws maps a lot -- I think two decades, right, at least -- do you think it was a good idea to split Cobb into four pieces?

A Cobb is a large county. Splitting Cobb multiple ways is not an unforeseen situation. Other Metro Atlanta counties have been split. Fulton is split four ways, and it's -- it's doable at their level and easier for them to handle that sort of a change than it is in a smaller county.

Q Do you think, as someone with experience in map drawing in the state of Georgia, it was a good idea to add this southeast addition to the primarily rural CD 14?

A I always try to minimize the splits where I can. So if that was something that was an option, I would have preferred to always reduce those splits of counties, but I also work for the legislature, so...

Q In fact, if we go back to your September map, which I think is Exhibit 4, this southeast addition is not in CD 14. It's in CD 13?

A Correct.

Q Or I guess maybe it's a little in CD 11, too?

A Maybe a little both.

Q Yeah. So when you first drew the map --

A Uh-huh.

Q -- you thought the best approach would be to

not add Austell and Powder Springs, this area that included Austell and Powder Springs, into CD 14?

A I think if you look at the -- the benchmark plan, that area was previously in 13, so the change that was requested when I drew the original map, to my recollection, was to split -- I think it was to split Douglas. So the split there was in Douglas, and it's a deeper split between 3 and 13, than what ended up being in the Douglas split on the final version. And 13 is -- has less of the Cobb area because of changes in the other parts of the map.

Q Just so I understand, when you say your original decision, was that your decision or did that come from the chairman's e-mail?

A I could not verify that for sure. I don't recall whether that was in the e-mail or whether I chose to do that to try and make the numbers fit, but I don't remember. I almost do think that that document said to split Douglas, but I can't remember for sure.

Q And so apologies if I'm not reading this right, but it looks like Douglas is split almost exactly the same in the September and --

A It's -- it's definitely -- if you look at where the Paulding County line is and comes down and runs north to south, you can see that on the first draft that -- I

call it orange. Yellow/orange is almost all to the east side of that. If you look at the map that was adopted, you see there is a significant strip on the west side of where that line intersects. So there's differences there between the two. There's -- it's still -- of course, it is split, but it's a different split.

Q You think the -- it's -- it's the addition of Douglasville into CD 3. Is that about right?

I'm looking at page 2 where you can get a little closer --

A Right.

Q -- to 3.

A I'm not a hundred percent sure how that originated.

Q Yeah, yeah. All right. Because it looks to me, when comparing the September enacted, that the --

A Right.

Q -- difference is that Douglasville or around Douglasville --

A This is --

Q -- has been added. Does that sound right to you?

A That looks to be about right.

Q Okay. Do you know the racial composition of Douglasville?

A I do not specifically.
Q Okay. There were a lot of reactions to including the southeast addition into CD 14. Do you -- is that right?
A I'm not sure.
Q You're not sure.
Do you know that Representative Taylor Greene of CD 14 commented about adding this addition to CD 14?
A No, I'm not aware of that.
Q Are you aware that there was a lot of comments after the map was published from individuals who live in Austell and Powder Springs about adding Austell --
A The only --
Q -- and Powder Springs to CD 14?
A The only comments I heard were those who spoke at the committee. So if they came and spoke to the committee hearings on the bills, that's when I would have heard any feedback, and there may have been someone who spoke about that or some people. I don't recall.
Q But right now you don't recall any comments about adding Austell and Powder Springs to CD 14?
A I don't. Not specifically.
Q Okay. Anything about the composition of CD 14 on the final map?
A What do you mean "anything"?

Q You heard some comments, right?
A Right. If the people that spoke at -- at the committee meetings would have said, there were those who spoke about that.
Q Do you recall any of those comments that were at the committee meetings to be about CD 14?
A That's what I am saying. If I had heard anything, it would have been -- it would have been in those comments, were the only ones that I heard.
Q And what were those comments?
A That the people in that area did not want to be in the 14th District.
Q Okay. So you have heard that?
A I heard that in those meetings, yes.
Q Okay. After you heard those comments, did you have any discussions with the people who were present at the working group, over the Zoom, about changing the map to take Austell and Powder Springs out of CD 14?
A I don't recall a discussion after that about that area.
Q Were there any discussions about changing Congressional map after the final map was published?
A I don't recall there being discussion about making changes once that version of it had dropped.
Q Okay. So there were committee meetings where

there was public hearings about the map, but no changes were made to the map after those hearings took place?

A So there was an original version, and then because there was a Congress prop, I think that was dropped. I can't remember the specifics, but they did, I think, make some adjustments. It's all kind of a blur to me now. I don't remember exactly the steps or when it happened.

Q But the primary amount of the work occurred before those committee hearings where people talked about CD 14?

A Right. They happened after the public hearings, but then after the --

Q There's additional meetings?

A Right.

Q Did you use the information that was included? Did you -- what did you do with that information that you heard at the meeting that occurred after it was published?

A That information, they are speaking to the members of the committee, and so I -- I work at the leisure of the members of the committee. So had the members of the committee requested that I do something with that information, then I would have.

Q It doesn't seem like they requested anything?

A (No oral response.)
THE REPORTER: Did you answer?
THE WITNESS: Oh, sorry. No.
MR. CANTER: Yeah, I'm sorry. I need to do better about asking you to say yes or no and not say uh-huh.
So I apologize for that, Marcie.
Q BY MR. CANTER: Would you agree that the residents of Austell and Powder Springs did not have an opportunity to elect candidates of choice -- of their choice when added to CD 14?
A Can you say that one more time?
Q Yeah. Would you agree that the residents of Austell and Powder Springs did not have an opportunity to elect candidates of their choice after their cities were added to CD 14?
A They would have been able to vote for a candidate of their choice when they vote. That -- that --
Q Sure.
A -- is hard to --
Q Sure.
So would you agree that the residents of Austell and Powder Springs did not have a likely chance to elect candidates of their choice once their cities

were added to CD 14?

A Considering that that area voted 60 percent or thereabouts for Democratic candidates and then being drawn into a Republican district, I would agree that it is more difficult for them to electric a Democratic Congressperson out of a district that is majority Republican.

Q Do you know that Austell is majority-minority?

A I do not know the demographics of the city. It was my understanding that the entire area that was pushed in -- that what did you call it, the southeastern?

Q The southeast edition, yes.

A Right, the southeast edition, that that area was a diverse area where no -- there was not a single majority race group, or at least in the voter registration numbers they were all a diverse area. So I don't know that it was comprised of one majority race in that area.

Q But you knew when you were at the working session, that the Southeast addition was a diverse area?

A I knew that it was a diverse area, yes.

Q Did the other members of the working group know that it was a diverse area?

A I don't know what the other members of the --

Q Right.

A -- working group knew.
Q All right. Did you talk about the composition of Austell and Powder Springs at all?
A I don't specifically remember a conversation about those two cities.
Q Did you talk about the geographic area which we've been calling the southeast addition at all during that meeting?
A Yes. Definitely the interest was in the politics of that area and the way they voted.
Q Are you aware of whether the residents of the rural portion of CD 14 said anything about adding Austell and Powder Springs?
A Can you say that one more time?
Q Yeah. Are you aware of whether the residents of the rural portions of CD 14, closer to the northwestern edge, had any comments about adding Austell and Powder Springs into CD 14?
A I'm not aware.
MR. CANTER: The -- how long have we been on the record?
THE VIDEOGRAPHER: 44 minutes, this section.
MR. CANTER: Can we do 10 minutes?
MR. JAUGSTETTER: Okay.
THE VIDEOGRAPHER: The time is 1:40. We are

going off the video record.

(The deposition was at recess from 1:40 p.m. to 1:56 p.m.)

THE VIDEOGRAPHER: The time is 1:56. We are back on the video record.

MR. CANTER: I want to clarify for the record the exhibit numbers for the documents that I just showed during the last session.

Exhibit 5 will be the zoomed-in map of the area of Oxford, and Exhibit 6 will be the prior and enacted Congressional District 14 boundaries.

Q BY MR. CANTER: Director Wright, did you speak with your counsel about the contents of this deposition during the break?

A No.

Q Did you speak with anyone else about the contents of the deposition during the break?

A No.

Q Can you please go to the enacted Congressional map. It was Exhibit 2.

A 2.

Q And can you take a look at CD 13? We spoke a little bit about CD 13 before because you pointed out that an area around Douglasville had previously been in CD 3 and was added to CD 13. Is that correct?

A I think Douglas County had been wholly within 13.

Q Ah. So in the benchmark plan, Douglas County was wholly in 13?

A Correct.

Q In the September plan, a portion of it that didn't include Douglasville was added to 13; and then for the enacted, that portion that now includes Douglasville was added?

A That sounds correct. Yeah, it changed.

MR. CANTER: Okay. I'd like the court reporter to mark as Exhibit 7 another comparison of two districts. This time on the left we have the benchmark Congressional District 13, and on the right we have the enacted Congressional District 13.

Q BY MR. CANTER: Does that sound right to you, Director Wright?

A Yes. I haven't looked at it yet, but...

(Deposition Exhibit 7 was marked for identification.)

Q BY MR. CANTER: So yeah, take a second. Does that look right?

A That looks right.

Q Okay. Now, can you go to the population summary tables in Exhibit 2 and look at the data

reflecting the black population in CD 13.
Do you see where I'm looking?
A Yes.
Q It says that the black population is just under -- or just over 64 percent of CD 13; is that right?
A Yes.
Q Do you consider that CD 13 a packed district?
A No.
Q Why not?
A Packing usually is a higher percentage, in my mind, than 64 percent.
Q Okay. So am I understanding that the reason you think CD 13 isn't packed is because 64 percent black population isn't enough to constitute a pack?
A I don't know that I'd say isn't enough. But typically, when I have looked at things to question whether or not that was something that was packed, these numbers were significantly higher than 64 percent. We have a lot of districts on our House and Senate maps that are comparable to that number and note those are not -- we would not consider those to be packed districts either, so I would not consider that to be a packed.
Q If we can go back to the summary table. Right next to it is the Hispanic population for CD 13.
A Uh-huh.

Q And that's just over 12 percent.
A Yes.
Q Now, if you were to combine the black and Hispanic populations into a single minority coalition, that would equal about 76 percent Hispanic/black population in CD 13, right?
A Yes.
Q Would you consider 76 percent of a -- of a coalition population to be packing that coalition into the district?
A I have not usually combined race categories together to consider it a packing or not packing. From my experience, it's typically been one single race category.
Q Okay. Let's say it was one single race category.
A Uh-huh.
Q Would 76 percent of that group be considered a pack to you?
A It would be a high number. It might depend on what the circumstances were in the area surrounding that same area. I know that we have had some of our State House districts that have been around 70 percent of a single race category, which is high, but they are also surrounded by other districts that are equally as high.

So in order to -- there's not an easy way without trying to locate population that is not of that single race category to bring that number down even lower. So it does depend on other factors.

Q So though it can depend on other factors, would you say that over 70 percent often reflects a packed district?

A I think it just depends on the circumstances.

Q In the majority of the time, all else equal?

A I don't know that you could say that, and it just really does depend on the circumstances.

Q Right. What kind of circumstances would have to be in place for over 70 percent to constitute a packed district?

A Well, I just explained to you, if you are in an area where there are a lot of the same demographic --

Q Yeah.

A -- same single race category, it's very difficult to find population that is not of a single, that particular race category, then it's likely that you are going to see districts that are of that -- of that level in one race percentage.

Q Yeah.

A And that could be whether it's, you know, 77 percent white population all in one area, or you've got,

you know, 72 percent black population, because it's where they live in one area.

Q So would you say that the diversity of the geographic space can impact whether a district at 70 percent of a black population is packed?

A Say that one more time. I was following you and then I --

Q Yeah, sure.

So would you say that the diversity of the geographic space where you are drawing the district can impact whether a district that has a 70 percent black population is packed?

A It could, yes.

Q All right. Would you say that most of the time under those circumstances, 70 percent constitutes a packed district?

A Again, I'm not -- I'm not gonna say that there's a particular number that constitutes a packed district. It depends on the circumstances.

Q But would 70 percent be pretty high?

A 70 percent of one race would usually be a high number to look at, but that would cause you to want to look at the other surrounding numbers.

Q Yeah. Unless -- unless you have the circumstance you described of -- of very high density of

a certain race in the geographic area, would you say that 70 percent often looks like a pretty high number?

A I said 70 percent can look like a high number but would cause you to want to look at other circumstances as to why that district is that high.

Q Yeah, sure. Okay.

So 70 percent might be -- might be a red flag?

A May be.

Q It could be a red flag?

A Could be.

Q All right. What other things could be red flags that could make you think, oh, this might be a packed district?

A Well, as I've mentioned, you are looking at the geographic, the area -- the demographics of the area that surrounds that particular district. In communities, you are talking about communities that are of interest or that share common resources, common areas or whatnot, a lot of times do have the same demographic, you know, makeup. So it's hard to say, well, should you divide up a community that people share resources, share schools, share whatever in the sake of making that number lower.

Q Those are some of the factors?

A That's some of the things you would consider.

Q Any others?

A I have to think about it, but that's definitely one of the things --

Q Yeah.

A -- to look for and to look at.

Q Okay. Do you remember drawing -- do you remember drawing CD 13? I know we talked about a portion of drawing CD 13. Do you remember drawing CD 13?

A Not specifically in detail.

Q Were there any discussions during the working session about CD 13 in particular?

A I don't recall any.

Q Okay. You can put the document -- those documents to the side.

MR. CANTER: I'm going to hand to the court reporter what should be marked as Exhibit 8.

(Deposition Exhibit 8 was marked for identification.)

Q BY MR. CANTER: And Director Wright, this is the enacted Senate map, if you want to take a second to look at it.

Does this look right to you?

A Yes.

Q And we've already talked about this, but do you remember -- you drew this map?

A Yes.

Q All right. And just to make sure I'm recalling, the process was you drew a blind map, and then based off directions primarily from Chairman Kennedy but also from other senators who Chairman Kennedy allowed to provide directions, you made changes?

A Yes, I don't know that I'd say "allowed," but he spoke with senators and incorporated their feedback.

Q Okay. So this is helpful, because my understanding from your prior testimony was that because Chairman Kennedy was the author of the bill, he had to provide permission to anyone who was going to give you additional directions on how to make changes to the lines of the map?

A Correct.

Q Okay. So where am I -- why are you getting a problem with the "allow"?

A Well, he, as I mentioned, later on when it came back to me, that he met with senators and they opened up. So any feedback -- because you had asked about how would he know --

Q Yeah.

A -- what to do. He had -- he was meeting with senators away from my office --

Q Right.

A -- on his own and having conversations, and

their feedback, then he could bring to me through --

Q I understand the distinction.

A -- through him. Yes.

Q Thank you. Thank you.

Do you see Senate District 17 on this map?

A Yes.

Q All right. Do you know who is the senator in SD 17?

A Yes.

Q Who is it?

A Brian Strickland.

Q Do you know Senator Strickland?

A Yes.

Q Do you remember drawing SD 17?

A Yes.

Q Do you remember if anyone provided you direction about SD 17?

A There was discussion about that particular district, yes.

Q Can you describe the discussion?

A Yes. So Senator Strickland is a Republican who lives in McDonough, in downtown McDonough, and to try and create a district that he could continue to win, because he's the chair of judiciary and an incumbent senator.

Q Who did you have these discussions with?

A Who did I have these discussions --
Q Yes.
A -- with?
That would have been with Chairman Kennedy.
Q So did Chairman Kennedy convey Senator Strickland's position about SD 17 to you?
A I don't know that he conveyed a position about it.
Q Okay.
A I think the idea was to draw a district that would be a Republican district.
Q So Chairman Kennedy told you to draw a district that would allow Strickland to win?
A I don't know that it's -- it's hard to bring out explicit details of conversations because I don't know that he said that word for word --
Q Yeah, I understand.
A -- verbatim, but that was the understanding. I think for all the senators there was, you know, drawing a district that would allow any incumbent senator to continue to be reelected was something that they considered.
Q Was there any direction about how Chairman Kennedy wanted you to draw SD 17?
A I don't know if -- if I recall specific

guidance from him or if it was one of those collaborative things that you've mentioned before, working through the -- the area there, the other counties in that district that surround it.

Q Was SD 17 discussed during the large working session where you were there in person regarding the Senate map?

A I'm trying to remember if there was a large working -- I don't think there was a -- not the same kind of thing.

Q Yeah. You mentioned earlier that you met in person with a number of senators.

A Uh-huh.

Q That you had your computer up, and that you were making changes to the map during that discussion.

A That was the House.

Q That was the House?

A Yes.

Q So when -- okay. So when you are meeting with the Senate, you were talking with them, but you weren't actually making changes?

A There might have been times where we did work and make changes. There might have been other times we just discussed.

Q And what kind of discussions were you having?

A Well, changes -- potential changes to make to the map.

Q So it was a discussion about how to change the map, but you weren't at that moment making the changes?

A Could be. I mean, there was many discussions, many meetings, many work sessions -- I don't know how you want to define those -- during that time period. I can't recall one specific instance where we defined how to draw that particular district.

Q Did you talk about SD 17 more than once?

A Maybe. I don't know.

Q So you are not sure if it was more than three times?

A I don't know how many times I talked about any given district. They are all a part of a whole, so when you work on one district, you are going to impact others, which is gonna have a chain reaction to others. So it's hard to say we talked about it X number of times.

Q Yeah. Though, in terms of Representative Strickland's request to ensure that there would be a district drawn that he would win, how many times was that discussed?

A I'm not aware that he made that request, Senator Strickland.

Q I'm sorry, Senator Strickland.

A But I -- I don't know that he specifically said that's what he wanted. I don't know if that was something that the Caucus wanted to do or, of course, it is a Republican seat, that they would want to maintain.

So I don't know exactly where the details of all of that came to be, but could there be -- could we draw a district that he could continue to win, and the map reflects that.

Q It was just -- the information was just conveyed to you that a map should be drawn that Strickland -- District 17 should be drawn that Strickland can win. You don't know exactly where it --

A Right.

Q -- came from?

A I think considering incumbency was something they were looking at as a whole for all the senators, so I don't think that was a particular thing to target, well, we are going -- to target -- to use as him as an example. They were trying to accommodate all of the senators, to my knowledge.

MR. CANTER: I'm going to project Exhibit 8 through Exhibit Share. So this will be marked as Exhibit 9. Yeah, excuse me, I said Exhibit 8 inaccurately before. It's Exhibit 9 now.

(Deposition Exhibit 9 was marked for

identification.)

Q BY MR. CANTER: So let me describe this document to you. This represents the enacted SD 17 and also the benchmark SD 17. The blue lines reflect the benchmark SD 17.

A Okay.

Q The red lines reflect the enacted SD 17.

A Okay.

Q Does that make sense?

A Yes.

Q All right. And you will notice that there is some overlap.

A Yes.

Q Right?

There is also a number of dots in there, right?

A Okay. Those are dots.

Q Yeah, yeah, they are dots, yeah. And the dots are color coordinated based off of racial population statistics.

Does that make sense?

A Yes.

Q So, for example, the blue dots that are in the -- within the red district but not within the blue district is new white citizens added into SD 17.

Does that make sense?

A Yes.
Q All right. It looks to me like a lot of white citizens were added into SD 17. Do you agree?
A It's color dots on a map, so I can't tell you the number of people, but yes, it looks --
Q Right. All right. I understand that you are having to trust that this is an accurate representation, correct?
A That's what -- right.
Q So but accepting that, looking at this image, would you agree that a large number of white citizens were added into SD 17?
A It's hard to tell the density and all, but it appears that that is the case.
Q Okay. If you can take a look at the bottom left, I'll call it southwest portion of this image, which reflects the blue lines for the benchmark plan but doesn't include any of the red map, the enacted plan.
Does that make sense?
A Say that one more time.
Q Yeah. The southwest portion, where its geographic area that was in the benchmark plan --
A Uh-huh.
Q -- but not in the enacted plan, right?
A Okay.

Q Are you looking at the same thing?
A I think so.
Q It looks to me like this population includes a lot of Latino voters.
A I can't clearly distinguish the coloring between the green and the orange on the screen, so I actually didn't realize that that was orange until you said that.
Q Okay. Okay. So you do see -- do you see that there is a difference between the green dots and the orange/yellow dots?
A Somewhat.
Q Okay.
A They seem to be blurring together a little bit, but that helps.
Q Is that helpful?
A Yeah, that helps.
Q Yeah, maybe if you -- I will try to -- oh, Jesus, I'm sorry.
MR. DAVIS: You are good. You can have control.
Q BY MR. CANTER: So do you see the image right now?
A That's better, yes.
Q Yeah. So this is the southwest portion we were

just talking about. And the yellow dots are Latino citizens, the green dots are black citizens, and the blue dots are white citizens.

Do you agree that a lot of Latino citizens have been taken out of SD 17?

A It looks to me that there is a broad spectrum of population. There's a large area of blue. There's an area of orange mixed with green. There's an area here -- I mean, I wouldn't know exactly what that represented other than a variety of those different colors.

Q Okay. If we can just zoom out again.

So a lot of white citizens were added in the top right portion, and it was a mix of citizens that were taken out in the bottom left portion. So does it accord with your understanding of changes to SD 17 that the district has gotten whiter?

A I couldn't speak to the exact demographic breakdown of what it was to what it is. This was a -- as I mentioned, this district was about political improvement, and that is what the number -- that's the numbers that I was looking at for this particular district.

Q Specifics aside, does it generally accord with your understanding about changes to the composition of SD 17, that it's gotten whiter?

A That is what it appears to be on here.
Q If you can go to the population summary page on the -- this Senate district map. I don't remember what exhibit number this is.
A 8.
Q 8. Exhibit 8. Thank you.
And do you see that SD 17 has almost 57 percent white population?
A Yes.
Q Do you think that's a lot?
A 57?
Q Yeah.
A I don't know that that's sufficiently a lot.
Q Do you think that's enough to ensure that Senator Strickland can win an election?
A That wouldn't have been what I based that on. I would have looked at the political data to determine whether or not I thought it was a district that would win reelection for him.
Q What political data?
A The same political data we've looked at for all -- that we pull into the precincts, election data, election returns.
THE REPORTER: Wait. Say that again. Just start over.

THE WITNESS: The same political data that we have discussed that we brought in from the Secretary of State's Office that are election returns.

Q BY MR. CANTER: Do you recall whether you looked at data at the county level when determining how to draw the lines for SD 17?

A Can you say that one more time? I'm sorry.

Q Yeah. So do you recall whether you looked at data at the county level when deciding how to draw the lines for SD 17?

A Possibly. I know there is one whole county in the district, so we probably would have looked at county data there. The others we would have looked at probably precinct data because it's divided amongst different precincts.

Q Any other layers?

A What do you mean "other"?

Q Did you look at block level data?

A Possibly, if we had to look at splitting a precinct. I don't know if he has any split precincts in this district or not.

Q Okay. But you at least looked at precinct level data?

A Yes.

Q If you go back to Exhibit 8, do you see a bit

above SD 17, there is SD 48?
A Yes.
Q Did you draw SD 48?
A Yes.
Q Do you recall drawing SD 48?
A As a part of the map as a whole, yes. Specifically, no.
Q Do you remember having any discussions about SD 48?
A Not -- there were some, yes, but...
Q What were the discussions?
A So Senate District 48, there was a discussion about whether that district could be flipped from a Democratic seat to a Republican seat.
Q Do you know who had those discussions with you?
A Again, these discussions kind of happened in a -- not necessarily one on one. There might be a group discussion or things that had been discussed that are then brought to me. I don't have a specific conversation that I can recall.
Q Do you recall whether Senator Kennedy, Chairman Kennedy was part of any discussion about how to change the composition of SD 48?
A Yes.
Q Do you know who was the senator in SD 48 prior

to the 2022 election?
A Yes.
Q Who?
A Senator Michelle Au.
Q Do you know whether Senator Au is a person of color?
A Yes.
Q Is she?
A She is. I don't know -- she's Asian. I don't know more specifically.
Q Do you think Chairman Kennedy was aware that Senator Au was elected for SD 48 at the time that the redistricting was taking place?
A Can you say that one more time? I'm sorry.
Q Yeah. Senator -- Chairman Kennedy knew that Senator Au had the seat for SD 48 at that time, right?
A Yes.
Q And he wanted to get Senator Au out of SD 48?
A I don't know that that was exactly the way that would have been put. It's a difference between wanting to make a district more Republican versus Democratic than to say, I want to get rid of someone. I don't think that was ever terminology I heard.
Q That's fair.
MR. CANTER: I am going to show on Exhibit

Share another document, once it's ready. And this is going to be Exhibit 10 for the marking.

(Deposition Exhibit 10 was marked for identification.)

Q BY MR. CANTER: Just let me know when you see it, Director.

A I can see it.

Q Oh, great.

A It's far back.

Q So Director Wright, this is another map, like the last one. So the blue lines represent SD 48 in the benchmark plan, and the red lines represent SD 48 in the enacted plan.

Does that make sense?

A Yes.

Q All right. And it's the same description on the bottom where the dots represent the race of different citizens within the district.

Does that make sense?

A Yes.

Q Would you agree that a lot of white voters were added to SD 48?

A Yes.

Q Would you agree that a lot of Latino voters were taken out of SD 48?

A Yes. It would be helpful if there had been an overlay of the new Senate District 7, because most of that area is the new Senate District 7. So it actually created a new district, that portion. As everything again shifted upward, that's where the new district was placed. And it was -- if you look at Exhibit 8, you will see that on there, but it would have been helpful to have seen that overlay there as well.

Q Yeah. Yeah, I guess on page 2 -- it's a good point -- on page 2 of Exhibit 8, you can actually see a blowup of 48 and 7 --

A 7.

Q -- right under it?

A Yes.

Q So --

A So most of that area you are asking me about that is below the red line, and in that area where there is a large population of Latino and some Asian -- I can't see. I think there's green in there. I can't make it all out -- was part of the population that was used to create the new District 7 there. That is mostly -- that is all within Gwinnett, and there's an extremely diverse district there, as that other district pushes 48 northward.

Q Were you aware -- or, actually, let me ask

this. Was Chairman Kennedy aware that adding white voters to District 48 would cause Senator Au to lose?

A I don't believe we discussed adding white voters in an effort to cause her to lose. We discussed adding Republican voters in an effort to make that seat competitive.

Q Okay. And how did you seek to accomplish that?

A I'm sorry, can you --

Q Yeah, sure.

A -- rephrase that?

Q Yeah. How as the map drawer did you make changes to Senate District 48 to reflect the goal that Senator -- that Chairman Kennedy wanted?

A Right. So I think in the creation of District 7 first, once we were able to draw that district there, which we did, of course, take some of the population away from District 48 to fit that new district in Gwinnett, which is a very rapidly growing county, very diverse county, we created that new seat there, pushing 48 upward.

So that then caused us to make decisions about where do we push District 48, now that it will need to pick up population, and also to make it a more competitive political district. That we would have to go northward, and going northward into Forsyth County and

into that area, in the Sugar Hill area, those were some Republican voting areas that would create -- that make -- make District 48 a more competitive district.

Q It looks to me from Exhibit 10 like those are also -- on the screen, excuse me.

A Sorry.

Q No, no.

It looks to me like on Exhibit 10, that the northern areas added to Senate District 48 are also -- have a very large white population?

A Well, I don't create race density maps like this, and this is something I have not seen, so this is your analysis of it. That is not something we use or look at when we do this, so this is new to me to look at it like this.

Q Okay. Did you draw Senate District 48 while looking at the precinct level layer?

A Yes.

Q Did you also look at the block layer while drawing Senate District 48?

A I don't know that I would have looked at blocks. If I was able to draw that with whole precincts, I wouldn't have zoomed into the block layer. It's possible that I did in some of the Sugar Hill area. It looks like I followed the interstate there, so it's

possible I might have used that as a line, as a good boundary line, but I don't recall specifically using the blocks.

Q Do you recall whether any of -- during any of the collaborative discussions with more than one senator, where you and them were talking about how to draw maps together, do you recall senators from 48 ever coming up?

A Do I recall the senator from the 48th at the time we drew the map?

Q Do you recall -- sorry, let me rephrase.

You've mentioned that you had a lot of collaborative discussions about drawing the map, not just with Senator Kennedy, but with multiple people.

A Uh-huh.

Q In any of those discussions, did the composition of 48 come up?

A It would have come up at some point, yes.

Q Do you remember when it came up?

A No, not specifically.

Q Do you remember who brought it up?

A No.

Q Do you remember the context of the discussion?

A I think I've already kind of framed that in terms of we added the new seat into Gwinnett --

Q Yeah, okay.

A -- which caused then the effect of moving.

Q Okay. Do you think new Senate District 48 is compact?

A Yes.

Q Going back to the Senate District 17, which you can see on page 1 of Exhibit 8, do you think Senate District 17 is compact?

A It is not as compact as some districts would be. Some of that may be in part due to the shapes of the county lines there that cause it to have a bit of a jagged appearance, but it is not as compact as other districts might be.

Q Do you recall why Newton County is split between Senate District 17 and 48?

A It had previously been split between them.

Q Right. Did you talk about trying to make that county whole as part of the enacted plan?

A I don't recollect a conversation about trying to make Newton County whole. And both of the senators who represent it do a lot of work in that county, so they -- neither of them mentioned trying to give it up.

MR. CANTER: How long have we been going?

THE VIDEOGRAPHER: 36 minutes.

MR. CANTER: I'm going to provide to the court reporter Exhibit -- what should be marked as Exhibit 11.

(Deposition Exhibit 11 was marked for identification.)

Q BY MR. CANTER: Director Wright, this is the enacted House map. Do you agree?

A Yes.

Q You drew this map?

A Yes.

Q I just want to make sure I remember. Did you earlier testify that the way you drew this map was that you drew a blank map, or was that what you called it?

A Blind.

Q Blind map. Excuse me, a blind map.

A I mean, to clarify, meaning there wasn't input on specifics about the way the map would look.

Q Yeah, I understand.

A Okay.

Q It was all you?

A Well, don't say that. It was using the -- what the data that we had, the existing map and the numbers in the population, and referring to that in trying to shape --

Q Okay.

A -- using all of the redistricting principles.

Q Right. Which we discussed earlier?

A Yes.

Q Yeah. Okay.

And then Chairman Rich came and provided direction, either directly to you, or Chairman Rich spoke to other members of the House and they provided direction to you through Chairman Rich?

A Yes.

Q Am I missing anything about people who provided direction to you about how to draw this House district?

A I'm not sure what you mean.

Q Are there other people that directed you on how to draw the House plan that I haven't mentioned already?

A Counsel was involved in consulting on -- on the drawing of the maps as well.

Q Anyone else other than your counsel or those that I've mentioned?

A Not that I can recall.

Q When you are drawing at the House level, are you more often looking at the block layer?

A It would depend on which part of the state you were in. In the more rural parts of the state, as you can see on the map, the districts are larger --

Q Sure.

A -- and made up of whole counties. So in those cases, it's probably more county and precinct based in terms of what you use.

As you get into more populated and smaller areas and much smaller districts, then you would sometimes -- even then I try to stick to precincts as much as possible. But only in need of population balance, when you are trying to close up the deviation range, would you look at blocks.

Q Why do you try to stay in precincts most often?

A Precincts, it's most helpful to your county election official. That's how they assign their voters. So they are -- all voters are assigned a precinct that they vote at, so when they go in to make changes to district assignments for their ballot combos, it's pretty much all of the voters in one precinct. They can give them all one assignment. It's a much easier process than having to sort a combo out and determine streets on one side of a split or another.

Q So all else equal, you don't want to make changes at the block level?

A We try to avoid that, yes.

Q Yeah. But you have data that could reflect that, the changes if you need to?

A If we have to do that, yes, we can go block level.

Q Okay.

A Even at that point, I always try to stick with

major features to split a district. It makes it easier. Street -- major interstate or a street or something.

Q Do you recall drawing House District 49?

A I recall working on House District 49.

Q What do you recall about it?

A There was discussion and work in that area of how to draw those districts there. I think we did draw a new district that's just below that, the 53rd.

Q The 53rd? I see that, yes.

A Uh-huh. That was an open seat, so trying to configure adding an open seat in that area between the other districts there, and also trying to make them politically competitive in that area.

Q Who was the elected official for House -- the area where House District 49 is before -- you know, under the benchmark plan?

A I believe that's Representative Chuck Martin.

Q Okay. Did you speak with Representative Martin about the composition of the new House District 49?

A I believe I did speak with him at some point.

Q What did he say?

A I don't remember specifically what he said.

Q Generally?

A I mean, of course, drawing a district that -- you know, and any member when you are at this level, you

are talking about the precinct level, they have precincts that they have connections to, whether it's family lives there, a school they went to, they have good support there, whatnot. So when you discuss those precincts, they want to make sure those precincts are in their district if possible.

Q Did you discuss with Chairman Rich the composition of HD 49?

A I would expect that she would have been present with conversations that were had in that area.

Q Why?

A She was usually present when we met with other members discussing the districts in certain regions.

Q Did the racial composition of HD 49 ever come up in discussions?

A I don't recall that coming up in discussions.

MR. CANTER: I'd like to -- I'd like to offer for marked Exhibit 12 another document on Exhibit Share.

(Deposition Exhibit 12 was marked for identification.)

Q BY MR. CANTER: So this is the same type of image, once you see it on the screen.

MR. DAVIS: Can you guys -- is it showing?

THE WITNESS: Yeah, I can see it. It's kind of far back, but if you zoom in, it might cut off.

MR. DAVIS: You want me to zoom in?

THE WITNESS: It may cut some -- okay. Yeah, that's good. That's good.

Q BY MR. CANTER: So the principles for this document are the same as the two that we see before. The blue lines reflect the benchmark of House District 49, and the red lines reflect the enacted House District 49.

Does that make sense?

A Remind me one more time. The blue is the old and the red is the new?

Q Yeah. Blue before. That's how I remember it.

A Blue before, there you go. Okay.

Q Do you agree that a lot of white people were added into HD 49?

A It does look to be that from your image.

Q Was a goal of Chairman Rich when drawing the districts in the House map to retain the core of a prior district?

A I think that was something that was considered. I don't know that that was something that was focused heavily upon. Sometimes that's easier in some areas than others, but it was not the -- not a top priority but something that was considered.

Q When you say it was considered, do you mean that it was considered as a factor to bake into the

drawing or as a factor not to bake into the drawing?

A So in a lot of the districts, it's easier to look at cores of districts where a previous district had been. From things we've heard, a lot of the people in the public hearings, you know, wanted to maintain consistent representation with the -- the representative or senator that they had had before, so we do try to consider, if we can try and draw a district in a similar way, to maintain as much of that as we could, but also knowing we have to make changes due to growth and population.

In this particular area, in the Metro area, we know there's been a ton of population growth, so that's going to involve, of course, in this case, adding a totally new district that had not been there before. I think we actually did that in Gwinnett as well. So in that same region, when you are adding new districts, there were open seats that -- yeah, well, that one I think didn't run again. But it does make a difference in trying to maintain, because the districts don't necessarily look the same anymore as they move due to that shifts in population. You can't just always keep them just as they were.

Q Do you think the new HD 49 retains the core of the benchmark HD 49?

A It retains some of its core. I mean, there's obviously overlap in this map. I don't know particulars on the value of how much that population is that was there before. Obviously, it's -- there's some, but it did shift.

Q Would you say -- when you said it retained some of the core, do you think -- would you say that it retains more than half or less than half of the core?

A That's speculation. I have no idea.

Q Okay. When drawing this district, do you recall whether you looked at precinct level data?

A Yes. I would most likely have been working with precincts.

Q Do you recall whether you also looked at block level data?

A I do not recall specifically looking at the block level. They do have some precinct boundaries that are a little unusual sometimes.

Q Yeah.

A So sometimes you do have to look at that, if they have non -- they have some noncontiguous pieces --

Q Yeah.

A -- of precincts up there, so you do have to look at it sometimes.

Q Yeah, if you don't mind, I'm going to try to

zoom in on a portion in the enacted, a little -- where it sort of looks like there's like a person pointing in the left direction --

A Uh-huh.

Q -- that's not part of the district. Do you see that?

A Yes.

Q Right.

Is that one of these areas that you mentioned that might be a little -- I think you said maybe a little noncontiguous, is how you put it?

A I don't know if that one is noncontiguous.

Q Yeah.

A That might be part of a city boundary there.

Q Okay.

A There's a little city of Mountain Park there. It could be a portion of that. It could be a city limit from one of the other cities. They do tend to follow the city limit boundaries for their precincts in that area, which tends to make them look a little more unusual.

Q Okay. Right now you're not sure whether that's -- that somewhat odd shape reflects a split county or a split precinct?

A I would expect that is a precinct boundary, because I wouldn't have drawn a split precinct that

1 looked like that.
2 Q Okay. Looking at this document -- and we can
3 zoom out if that's helpful -- do you see anywhere that
4 looks like a split precinct?
5 A Without the precincts, it's hard for me to
6 tell. They're on the exhibit, but it's hard to see
7 because it's not zoomed in very well either. So I can't
8 say for sure without having that.
9 Q We can put the Exhibit Share document away.
10 And if you can go to the Georgia House
11 District, which I think was marked as --
12 A 11.
13 Q -- 11, thank you. And again, on page 2, you
14 can see House District 104.
15 Do you see that?
16 A 104?
17 Q Yes, ma'am.
18 A Yes.
19 Q Do you remember drawing House District 104?
20 A Yes.
21 Q Who was the representative of that district?
22 A That would be Representative Chuck Efstration.
23 (Court reporter clarification.)
24 Q BY MR. CANTER: What did you and the
25 representative discuss -- did you discuss with the

representative about HD 104?

A I don't recall discussing it with him prior to -- well, I don't know when I discussed it with him. There was a time that I spoke with him. I don't recall if that was before or after the map was in a format that was presented. I don't remember when it was.

Q Did you speak with Chairman Rich about HD 104?

A Yes, I believe she would have been involved in those conversations.

Q Were there any conversations with Chairman Rich that didn't include Representative Efstration?

A Efstration. I couldn't say. I'm not sure.

Q What did you talk about in terms of the composition in drawing a new HD 104?

A I think that if -- in some capacity, I was told that 104, of course, they want to ensure that it maintains as -- oh, it got dark -- a Republican district, that an electable district for him, and that to draw that district into Barrow County would be the direction for that one to move, to pick up population. That would continue to maintain that district as a Republican district.

Q Just so I understand, were you directed to add Barrow County into HD 104?

A Again, you know, we've talked about this being

a collaborative thing. At some point in conversation I think that was mentioned. I don't remember being, you know, directly told do this and that was how it happened, but the discussion was there that taking it into Barrow County. And I think all of these districts kind of pushing out a little bit from where they had been because of the growth in the Metro area, especially in Gwinnett, them pushing outward is not -- that was sort of the side effect of the growth in the -- in the area anyway, that they were going to push out to some degree in some areas. And so that one pushing into Barrow to pick up Republican population that votes Republican to ensure that district to maintain.

Q Do you know the racial composition of sort of the middle of Barrow County?

A No, I do not.

Q And I appreciate you bringing this up. You've -- I agree we talked about it and you mentioned that sometimes you had conversations about how the composition of lines should be drawn.

Ultimately, did you always follow the directions of Chairman Rich or another member of the House when drawing the House lines?

A So making changes to the map would usually have been prompted by a discussion with Chairman Rich or

counsel on behalf of members or Chairman Rich. It doesn't necessarily mean that there's a specific directive on what to do, but it might be an objective, or try and adjust this here or there, something along that nature, so that I can then go in as the technician and look at how to make this fit. Can I --

Q Right.

A Can it be done, what they are asking, and how do we -- how do we fit this piece together. So it's not always so specific to the detail of doing it, but maybe a framework that they would like to try and see, if that's possible.

Q You were the technician, and if you could accomplish their request, you would?

A Yes.

MR. CANTER: I'd like to put up Exhibit 13 on Exhibit Share.

(Deposition Exhibit 13 was marked for identification.)

MR. DAVIS: I'm just going to pull it up.

Q BY MR. CANTER: Are you good?

A Yes. Thank you.

Q This is another one of the -- I think it's called dot density maps. Have you heard of that term?

A Yes.

Q Yeah, yeah, okay.
Where the blue lines are the benchmark plan --
A Uh-huh.
Q -- and the red lines are the enacted plan. Would you agree that the new HD 104 adds in a lot of white persons?
A Yes.
Q Would you agree that the new 104 has taken out a lot of Latino persons?
A It's hard to see the color things in here, but can you zoom in?
Q Yeah, I'm specifically thinking of the bottom left quadrant.
A There does seem to be a large area of Latino population in that -- in that area you are circling.
Q And just to make sure we're on the same page, the green dots represent black persons.
A Uh-huh.
Q Would you agree that HD 104 has taken out a large population of black persons?
A I don't see as much of that green dot on here as the -- what appears to be the orange. There is area that it has picked up also that is dense like that, but again, it's hard to speculate on how many people we're talking about when I can't -- I don't know the density of

that area or how many people that is.

Q Is the inclusion of a large white population into 104 and the exclusion of a large Latino population out of 104 consistent with your understanding of how the new 104 was, in fact, drawn?

A Can you repeat that one more time?

Q Yeah. Is the inclusion of a large white population into 104 and the exclusion of a large Latino population out of 104 consistent with your understanding of how the new 104 was drawn?

A I don't recall having discussions about adding white population or removing Latino population. I think the political goal of this district was what the objective was, to push it into Barrow County.

I also know we added some new seats in Gwinnett that would have pushed that Latino population into districts where they would have been, you know, a large portion of those districts in that area as this district shifted outward. So the political objective, combined with new districts being drawn, I think that's the effect, and that's why this district is shaped like it is.

Q When you drew this district, were you looking at the precinct layer?

A Yes.

Q Do you recall ever looking at the county layer when drawing this district?

A Most of these layers are on at the same time, so --

Q I see.

A And when I say I look at the layer, I'm not necessarily looking at what's in that precinct. I'm looking at an outline of a precinct or the outline of the county.

Q Right.

A I'm not looking at this is the demographics of a precinct or -- or the way that it votes or any of those things. I'm just looking at the outlines.

Q You are looking at the outline of, say, a precinct -- a precinct?

A Yes.

Q Which is how it's manifest on the precinct layer?

A Right.

Q And then when you click on that precinct, you are going to see pop up the demographic data --

A No.

Q -- related to that?

No?

A No.

Q Okay.
A No. With any labeling was on during this, it might have been the total population in the precinct, so that I would know whether I needed to gain, you know, 5,000 people or I needed to add 20,000 people to this district, then I might look at the total of the population. But when you select that in the pending change box, it's affecting the entire demographics of that district, so it doesn't pop up just one --
Q I see.
A -- precinct at a time. Or even with blocks, it doesn't pop up and tell me, oh, this block has this breakdown in it. It doesn't do that. It adds it to the whole.
Q To the whole district?
A To the whole, yes.
Q Thank you.
A So I'm looking at it as a whole.
Q Okay. So okay. Yep.
Do you recall whether the -- whether you looked at the block level? Well, I should rephrase.
Do you recall whether you made any block level changes when drawing HD 104?
A I don't specifically recall.
Q Okay. Do you generally recall whether you made

any block level changes when drawing HD 104?

A No, I don't recall whether I made any block level changes probably on a lot of these.

Q Okay.

A It's a lot.

Q You do know that you made some block level changes?

A I'm sure that I did in some places. Like I mentioned, you know, if there were block precincts that are noncontiguous, you are going to have block splits between those two, because you have to.

Cobb County is gonna have a lot of block level work because they have a lot of precinct split, noncontiguous pieces in islands in their precincts, so it's -- it's going to happen in certain places that I have to look at the blocks. But that is, again, I usually try to work with the precincts to avoid blocks and let that level of work, if I can avoid that.

Q Can you please take a look on page 2 of the House district document we are looking at right now of HD 48?

A Yes.

Q Do you recall drawing HD 48?

A Yes.

Q Who was the representative of HD 48?

A I -- I think that it was representative Mary Robichaux.

Q Did you ever speak with Representative Robichaux about the new composition of HD 48?

A No, I did not.

Q Did you ever speak with Representative Rich about HD 48 -- Chairman Rich, excuse me?

A Yes. I think this area was worked on all together. So we've talked about 49 and this whole area, so that would have been as a whole.

Q I believe when we talked about 49, you mentioned 53. What --

A Yes.

Q Can you elaborate on what you talked about with 48?

A I'm sorry, so 50 --

Q You talked -- when I asked about HD 49, I recall you talking about HD 53.

A Correct.

Q But now you are saying that you also, as part of the discussion, were looking at HD 48?

A So we don't draw districts in isolation one at a time. You are looking at, sometimes it's a county delegation as a whole. They all -- you kind of have to work as a group because when you make a change to one,

you are going to move another district. So when you reshape, push one district this way, you are going to have to fix that here. So you kind of work with all of them at the same time.

So this particular region would have been something that was looked at as a group, not one district at a time.

Q Were you directed to draw HD 48 in some way?

A No, I don't recall being told to draw 48 any particular way. I actually think that in working on some of the surrounding districts and then looking at the political breakdown afterwards, we -- I realized that it had then become a competitive district. That wasn't really the goal. It was the effect of working on the other area.

Q Can you take a look at HD 44, on page -- on the same page?

A I see it. It took me a minute, yes.

Q Yeah. Do you remember drawing HD 44?

A Yes.

Q Who was the representative of HD 44?

A I'm not certain.

Q Okay. That's fine.

A I think I know, but I don't want to misspeak, so I'm not gonna say.

Q I promise I won't get upset if you misspeak. Who do you think?

A There's a lot of members. We have 236, so I feel like I'm on the spot when you are asking me who is in every one of them.

Is that -- is that Don Parsons? Don Parsons.

Q I think that's right. I think that's right.

Did you speak with Representative Parsons about HD 44?

A I do not recall speaking with him, no.

Q Did you speak with Chairman Rich about HD 44?

A This would have been, again, part of an area discussion, the districts in that vicinity. So specifically that one district, I don't recall a conversation.

Q What were the -- in that area, what were your priorities? What were you directed to do about drawing the map?

A There is fairly large growth in that area around House District 35, and that's the college area. There's a school there, so there's a lot of growth in population. That school has really hugely grown in the last few years, so they've had a lot of change in the area there.

So in terms of -- that actually, I think, is a

change to the districts there, which push some of that population up into Cherokee as that district there was formed, 35. And talking about 35, 44, 22, 20, in that whole area.

MR. CANTER: I'd like to put up on Exhibit Share Exhibit 14.

Q BY MR. CANTER: And Director Wright, please let me know when you see it.

(Deposition Exhibit 14 was marked for identification.)

MR. DAVIS: It should be up there now.

THE WITNESS: It is. If you can zoom in some more.

Q BY MR. CANTER: You recall from before, this is another one of these maps where blue is before and red is after?

A Yes.

Q Does that sound good?

A Yes.

Q All right. And the dots -- the colors of the dots represents the same racial composition of the benchmark in enacted districts.

It looks -- would you agree that a large number of white voters -- white persons, excuse me, were added into HD 44?

A This one is hard to see. It looks to be a pretty disperse spread of different population in there, because there seems to be a fairly good bit of -- I think that's Hispanic population in there as well. It's kind of dispersed between.

Q Okay. Do you think that the new HD 44 retains the core of the old HD 44?

A As we said before, it retained some of the core.

Q Okay.

A I don't know how much. I'd have to, you know, do further digging to tell you how much of the core that it retains. It does have some. But again, this is another one of those everything expanding and pushing outward. This pushed into Cherokee County, and everything below is pushing the districts that way. So it did change. It does retain some of the core.

Q Did you ever have a discussion about a threshold of core retention that would be sort of satisfactory for the legislators or for anyone else?

A No.

Q So there is no notion of enough core retention?

A Not to my knowledge.

MR. CANTER: What time are we at?

THE VIDEOGRAPHER: We have been going one hour

and seven minutes on this segment.

MR. CANTER: Okay. Take 15 minutes; is that all right?

THE WITNESS: Sounds good.

THE VIDEOGRAPHER: The time is 3:03. We are going off the video record.

(The deposition was at recess from 3:03 p.m. to 3:25 p.m.)

THE VIDEOGRAPHER: 3:25, we are back on the video record.

Q BY MR. CANTER: Hello, Director Wright.

A Hello.

Q We were talking earlier today about the data you have for the block layer, and that some of the data you have is estimates of election results; is that correct?

A Yes.

Q Who created that data?

A So when we bring that data into our -- it's a part of our precinct creation. When we make the new precinct layer -- we do every two years -- we bring that in. So Rob Strangia in my office is the one who brings the data in and then allocates it to the Maptitude software program with the blocks and the precincts.

Q And how does he allocate the precinct level

data to the blocks?

A I'll give you my understanding of it. He has -- there's formulas he uses to use the registration data to correspond to what is in the Census block data. For instance, if you had a precinct that has a hundred people in it, if you said of those hundred people, 40 of those people were Asian, and in the Census block geography you have different Census blocks, and over here there is no Asian population; over here you see that there is Asian population, the formula would allocate those -- the data that goes with those -- that geography proportionally to the blocks that have the population based on the registration data that's in that -- in that file. It's --

Q Okay.

A He understands it.

Q So to make sure I understand.

A Yes.

Q You use precinct level demographic data, and with formulas estimate how the political data will appear on the block level?

A Yes. So the voter registration information that's included in that file helps the matching of the -- or the connection of the data demographically. Political data is proportional to, you know, the numbers of the

blocks. For instance, you might have an industrial area that's in a precinct. You wouldn't allocate election returns to the blocks where there is no population. So they would allocate to the blocks where there is population. So if you clicked on those blocks, that's gonna give you -- that's going to be where that is, as opposed to not --

Q Okay.

A -- somewhere where there is no population. It wouldn't make sense for there to be votes there.

Q Who made the formula that Rob used?

A I don't know.

Q Okay. Do you think Rob knows?

A I would assume Rob knows. Rob works with it. He may have been the one who came up with the formulas. I don't know how that's done.

Q It's possible that Rob came up with the formulas before someone else did?

A As far as I know, Rob has done this since I have been aware of it. So it's probably that Rob came up with it, but I don't know for sure. He'd have to explain that process.

I actually think he's testified to that before in other -- in a deposition before, so I don't know if you have access to find that out, but it's the same

process that was used there.

Q Okay. The process hasn't changed --

A No.

Q -- since the last time?

A No, it's the same.

Q During the period of time after you received the Census data and before you published all three of the statewide plans, which just for our purposes right now, I'm going to call like the redistricting period. Is that fair?

A Sure.

Q Yeah. During the redistricting period, did you get any requests for block equivalency data?

A Before maps were produced?

Q From the moment that you received the Census data through the time that the three statewide maps were published.

A I personally don't recall requests for block equivalency files before maps were produced.

Q It was all after the public data -- the public maps were produced?

A Well, yes, during that time period, because, of course, there were several different drafts.

Q Right. So let me -- what I mean by the redistricting period is the time when you received the

Census data until the time when all three of the final maps were published, so the maps that ultimately were passed by Governor Kemp became public. So this is after you --

A Can I ask you to clarify what you mean by a "block equivalency file" to make sure we're on the same page?

Q Yeah. So it's a spreadsheet that request -- that reflects block data.

A Like block with a district assignment?

Q Correct.

A Okay. Just making sure we're talking about the same thing.

So during the process of the draft maps coming out and being made available, yes, I did receive requests for block equivalency files.

Q From whom?

A I know that Shalamar Parham asked for them. And there -- I don't know if there were other people who did, but those -- I know she communicated directly with me. So I don't know if there were others. There may have been, but I know she did.

Q Do you know why?

A Do I know why she wanted them?

Q Yeah.

A I figured she was going to re-create those in her software or their office. She worked for the House Democratic Caucus, so I figured that's what they would be using them for.

Q Did anyone else ask for block equivalency files?

A I don't recollect anyone else, but that could have gone to other staff as well.

Q Other staff you mean in the LCRO?

A Yes.

Q So Mr. Knight?

A It could have -- any requests would come through our office manager, and then she would hand them or give them to staff --

Q Okay.

A -- to handle.

Q So it could have gone to Mr. Knight?

A Could have.

Q Could have gone to Mr. O'Connor?

A Could have. I would think if it was an e-mailed request, it would have been provided already in the documents.

Q What do you mean by that? Sorry.

A The way the -- all the information that was discovery, all those documents, if there was a request

for that, it would have been in that.
Q I see what you mean. We would have received those?
A Yes.
Q Okay. But do you know whether or not Mr. Knight or Mr. O'Connor were asked for block equivalency data?
A I do not know.
Q Were you asked for demographic data at any point during this period?
A Beyond what's been made available, or specifically what do you mean?
Q Yeah, beyond -- not including the demographic data that is associated with a map when it's published, other bespoke requests for data -- demographic data?
A It's possible. I don't have a specific recollection of any one individual asking for that. There could have been a request for that, but I don't know for sure.
Q Do you know if Mr. Knight was asked for demographic data?
A I don't know.
Q Do you know if Mr. O'Connor was asked for demographic data?
A I don't know that either.

Q And when you answer that, is that just within the redistricting period or is that even after the maps were published?

A Even after. I mean, requests don't come to me and then to them, so they -- like I said, they come through our office manager. If someone asks for some information, it could have been fielded out to anyone in our office to provide the answer to that.

Q You mentioned that Ms. Shalamar?

A Shalamar Parham.

Q Yeah, Ms. Shalamar asked for block equivalency data?

A Yes.

Q Did you give it to her?

A Yes.

Q Did she have any follow-up questions?

A No.

Q Can you recall providing block equivalency data to anyone else?

A She's the only particular individual I recall providing that or asking for that file.

Q So generally, do you recall other people asking for block equivalency data?

A What is the distinction in the question?

Q Because you said particularly, and so I'm

trying to see if you don't have a particular memory of someone asking it but you remember providing it via e-mail or via --

A Okay.

Q -- some other form.

A No, I don't remember providing it to anyone other than her.

Q Okay. Do you have any sort of general recollection of anyone else in your office, even if you don't know exactly or remember whom, providing block equivalency data to anyone else?

A I'm not aware of that.

Q How about demographic data?

A Not aware of that either.

Q No informal requests or anything like that to your staff for block equivalency data?

A So a block equivalency file is going to be a digital file, so it would have been in an e-mail. So you would've seen that in the documents we provided. I don't -- I don't know if there were any other ones.

Q When you are focusing on the documents that we were provided, is the point you are making that you've reviewed those documents, so you know whether it's there or not, or are you making a different point?

A I'm saying, I have reviewed some of those

documents. I don't know that I went through all of them thoroughly enough. I do not specifically recall anything I saw, other than I did see the ones where I provided those to Ms. Parham.

I don't know if there is others. I would assume that you have reviewed them, and if they were there, you would have seen them.

Q Okay. Does Mr. Knight write reports for legislators?

A Can you clarify what you mean?

Q You know, as part of his duties at the LCRO, does he ever write reports related to his duties?

A Not that I'm aware of.

Q Does he ever provide commentary on sort of historical data or trends in data for legislators?

A Not that I know of.

Q He's never done anything like that?

A I think he's done white papers before for members about local redistricting things. As I mentioned --

Q Yeah.

A -- that's his area of focus. I don't recall anything like what you are talking about with historical trends or things like that.

Q And the white papers were on local

redistricting?

A Correct. They could have been related to like city creation, where we've done -- the General Assembly has taken up some new city legislation. It could have been about a local redistricting process or something along that nature.

Q Has Mr. O'Connor ever written reports related to his work within the office for legislators?

A Can you be more specific on what you mean?

Q Remind me what his role is within the LCRO.

A He's a redistricting data specialist.

Q Right. Okay.

A So he looks at numbers.

Q So as part of his role as the redistricting data specialist, does he ever respond to inquiries about historical trends in the demographics?

A It's possible that he has, yes.

Q Does he ever prepare reports on the data and the demographic information?

A Not in an official capacity. He could be responding to a request for information, where he might compile something together and produce that as a part of a request for something. But an official role, no.

Q Can you think of a report or other sort of paper that he's prepared even if not in an official

capacity?

A I think there was some information he gave to some -- to a reporter at one point, Census information, I think it was, in a particular format; and then when the reporter returned to ask for the same thing, I think it might have been he gave it for the House and he wanted it for the Senate, and Dan was not there that day, so I took it and realized that he's compiled something different than our standard report. And then I just created to him the standard report to comply with that. It's something that I -- I don't have -- do just what Dan did, but -- but that kind of thing. He puts -- he's put numbers together like that for people.

Q So Dan put together numbers inconsistent with sort of the general protocol for the LCRO?

A Yes.

Q Yeah. When was this?

A I couldn't tell you for sure.

Q Was it during -- was it soon after the Census data was published?

A I honestly don't remember exactly when it was.

Q Okay. In 2021?

A I can't even say that.

Q Okay. I think you talked about data trend earlier; is that right?

A Uh-huh.
Q What did you mean by that?
A Growth change in different areas, population spread in different areas, those kinds of things.
Q What do you mean by "growth change"?
A So when an area has a massive amount of growth, population numbers go up, double, sometimes more than that. You see a significant boom in population in certain areas. Certain counties might see that. In our state we've had several counties that have had some rapid growth over the past 20 years. Those kinds of things.
Q Do you know if Mr. O'Connor has ever prepared materials about trends in the racial composition of the state of Georgia?
A He may have done that in the past. I'm not a hundred percent sure of what -- what all reports he's done for people like that, of that nature.
Q Do you recall whether he did it during what I have called the redistricting period?
A No. To my knowledge, he did not.
Q Did you direct him not to?
A Not specifically, no.
Q Okay. What makes you say to your knowledge he did not?
A Well, he oftentimes will copy me on requests

and reports and things he sends out that are custom, if they are custom, to see, you know, if -- there are times I have told him that we try to stick with our standard reports and not to do custom reports. So depending upon what the request was for, he might run that through me beforehand. And so, to my knowledge, he has not done anything like that.

Q You said that he will oftentimes copy you on requests and reports, so does that mean it happened often in 2021?

A I don't remember it happening often in 2021.

Q Do you remember it happening at all?

A It -- in my e-mail in 2021, no, I don't remember him copying me on a data report creation during 2021.

Q How about the -- maybe -- maybe softer than report creation, but did he -- are you aware of anytime in 2021 Mr. O'Connor accumulating data and providing it to someone else in a way that, you know, wasn't necessarily consistent with how your office generally provides reports?

A You're -- 2021 is an entire year. I can't tell you exactly what Dan did on every project or request he created during that time period. So no, nothing jumps out at me --

Q Yeah.
A -- specifically that he did during that time period. I don't know.
Q Do you -- do you have a recollection of at least -- and I'm not asking just in 2021, but do you have a recollection of at least one instance where Mr. O'Connor generated data outside of the sort of normal protocols for your office and provided it to someone?
A Yes.
Q Can you describe that instance to me?
A I think you just described it pretty well.
Q Okay. Do you know who he provided it to?
A I don't even remember who he provided it to now. That's been quite a few years ago.
Q Okay. Do you recall if it was for the mid-decade redistricting?
A I do not recall exactly when that happened, when it was.
Q It could have been after?
A After?
Q The mid-decade redistricting.
A You are talking about 2015?
Q Around that, yeah.
A It could have been after that, yes.
Q Okay. We've talked a lot about Mr. Knight,

Mr. O'Connor, and Mr. Strangia in your office.
A Uh-huh.
Q Am I missing anyone in your office?
A Yes.
Q Whom?
A So we have an office manager, Tonya Cooper. We have two new staff members that work on local redistricting, Maggie Wigton -- that's W-i-g-t-o-n -- and Gabe Mesriah, M-e-s-r-i-a-h. And that's all.
Q You've testified that Mr. Knight and Mr. O'Connor and Mr. Strangia were not involved in drawing the statewide maps. Is it also the case that Ms. Cooper, Ms. Wigton, and Mr. Mesriah were not involved in drawing the three statewide maps?
A Correct, they were not involved in it.
Q Would you say that in any way were they involved in drawing the maps? Let me rephrase. Sorry.
Was there anything different about how Ms. Cooper sort of was involved with the statewide map drawing process than how Mr. Knight and Mr. O'Connor were?
A None of my staff were involved in the statewide map drawing process.
Q So you didn't benefit from the roles and opportunities of your office manager in preparing the

statewide maps? You did it all yourself?

A When you say "preparing," I mean, she answers the phones and --

Q Yeah.

A -- greets people who come in the office.

Q Sure. Sure.

A So yeah, that's -- her doing that was helpful for me.

Q Okay. Okay. It's not like she wasn't involved in that process?

A Right. She was involved in greeting people who came to the office.

Q Still people came to your office and they'd say, oh, hi, Ms. Cooper?

A Right.

Q I see. Did she have any other type of involvement other than that?

A No.

Q Did Ms. Wigton or Mr. Mesriah have any type of involvement at all?

A Ms. Wigton met with a legislator at least once that I couldn't meet with because I had another commitment, to look at the maps after they came out, so that she could let him look closely in, zoom in on the district as it was proposed for them. I know there was

one instance of that.

They all -- they could have -- there could have been other instances of something like that where a member just wanted to look up close at their map once the maps came out. That wasn't really in -- much in changing the map but just looking at the map.

Q Do you remember which map it was?

A It was the one that was made public, yeah, the final version.

Q Of the Congressional, State Senate, or State House map?

A House, I believe.

Q Okay. Do you remember who the representative was?

A Yes.

Q Who was it?

A Representative LaRiccia.

Q Do you remember the district number?

A I want to say 169, maybe. Does that sound right?

Q Okay.

A Do I get bonus points for all these things I remember? I think that's the right number.

Q Is there anyone else who we haven't discussed that -- in the broad sense of -- even the broad sense of

Ms. Cooper helping, you know, greet people at the table, in the broad sense you would say sort of participated in the map drawing process?

A I think everyone we've mentioned so far that you've asked about. Counsel we've talked about. That's all.

Q Yeah. And this is in -- and I'm really trying not to exclude anything at this point, if that makes sense, right?

A So when you are talking about the map drawing process --

Q Yeah.

A -- versus the making the maps public and all those sorts of things --

Q Yeah.

A -- I mean, there were, of course, staff that worked for the IT and other things, that did other things as far as getting things posted online, and the committee aides who might have put maps on a wall or, you know.

Q Yeah, right. I hear you.

A But unless you want all of those people's names.

Q Yeah, understood.

You mentioned that you attended the hearings, the public hearings?

A Yes. I --
Q (Inaudible.)
A -- attended some, yes.
Q Excuse me. I didn't mean to interrupt you.
A No, go ahead.
Q You attended some of the public hearings but not all of them?
A I watched the ones I didn't attend.
Q When you attended the hearings, did you ever participate in them?
A We made a video that would have been shown at the beginning of every public hearing, kind of a redistricting information video. So if that counts as participating, I was in the video, then I'll say yes.
Q After the maps were published, you mentioned there was a hearing -- or a committee meeting?
A Committee meeting.
Q Would that be a better way to explain it?
A It's part of the legislative process, yes.
Q Okay. So let me -- I'll ask the question again.
After you published the statewide maps, there was a committee meeting to discuss those maps, or was there multiple committee meetings?
A It's part of the legislative process that those

maps are adopted through a bill, and the bill travels through the legislative process like any other bill, so it does go to both committees in the House and the Senate, so...

Q I see. Was there a single committee meeting to discuss all three maps or were they discussed at separate meetings?

A They were discussed at separate meetings.

Q Were these meetings public?

A Yes.

Q Do you recall all the meetings?

A Specifically in detail, no. Yet, I know that they happened and I went to most of them. I'm trying to think if there was a conflict at one point, maybe, that I couldn't have been at them, but I was usually at those meetings. But yes.

Q Did you participate in these meetings?

A Other than moving maps or pointing out districts, no.

Q Okay. Well, let's talk about -- what do you mean by "moving maps"?

A So they would also want printed copies sometimes on an easel to have on display, so we would move those. That's something my office provides. That's moving maps.

Q Okay. And pointing out districts, what does that mean?

A As the chairman would talk through the map and describe the changes to the districts, literally pointing the district number.

Q Okay.

A Where it was on the map.

Q Do you ever remember Chairman Kennedy doing that while he would describe the districts while you pointed to them?

A Yes.

Q Do you remember pointing to Senate District 17?

A I think I pointed to all 56, so yes.

Q All right. Do you know that when you pointed to Senate District 17, Chairman Kennedy said it was drawn to retain its core?

A I don't specifically recall that.

Q Okay. We can pull it up again if you'd like, but do you think Senate District 17 retained its core?

A I think it retained some of it, yes. It had its parts in Henry and Newton.

Q Okay. Changing gears a little bit, do you know how E-Net operates?

THE REPORTER: E-Net?

Q BY MR. CANTER: E-Net.

A I was about to say, what?
Q E, Election-Net.
A Do I know how it operates?
Q Yeah.
A Specifically, no. In general, to some degree.
Q Okay. Do you understand that the lines are -- or, I'm sorry, the lines are changed within E-Net by the local officials?
A Yes.
Q All right. And you understand that's a process that they go through to change it?
A Yes.
Q All right. I understand from the declaration of Ms. Lynn Bailey at the PI hearing, that part of that process within E-Net is manual. Do you understand that?
A I have never worked with E-Net, so I don't have any experience --
Q Okay.
A -- on that.
Q Okay. Have you -- do you know what Jarvis is?
A No.
Q Okay. Do you know that Georgia is trying to implement a new voter registration system?
A Yes.
Q Okay. Have you talked about that with anyone?

A No.

MR. CANTER: I think we can take five. We will take five.

THE VIDEOGRAPHER: The time is 3:51. We are going off the video record.

(The deposition was at recess from 3:51 p.m. to 4:02 p.m.)

THE VIDEOGRAPHER: 4:02 p.m., we are back on the video record.

Q BY MR. CANTER: Hello, Director Wright.

A Hello.

Q During this most recent break, did you speak with your counsel about the content of the deposition?

A Just the timing.

Q Did you speak with anyone else about the content of the deposition?

A No.

Q Did you speak with Bryan Tyson in preparation for this deposition?

A No.

Q Did you speak with Brian Knight in preparation for this deposition?

A No.

Q Did you speak with Dan O'Connor in preparation for this deposition?

A No.
Q Did you speak with Rob Strangia in preparation for this deposition?
A No.
Q I'm forgetting his first name, but did you speak with Mr. Mesriah in your office in preparation for this deposition?
A No.
Q Did you speak with Ms. Maggie Wigton in your office in preparation for this deposition?
A No.
Q Did you speak with Ms. Cooper in your office in preparation for this deposition?
A No, I did not.
Q Thank you, Director Wright. I have no further questions.
A Thank you.
MR. TYSON: Does anyone on Zoom?
MR. JAUGSTETTER: Is there anyone on Zoom that has any questions for Ms. Wright?
MR. JONES: This is Mike Jones for the Pendergrass and Grant plaintiffs. I have just a few.
MR. JAUGSTETTER: Okay.
>>>
>>>

EXAMINATION

BY MR. JONES:

Q All right. Good afternoon, Director Wright.

A Good afternoon.

Q I know it's been a long day, so I will not -- I will not contribute to keeping you here too much longer.

A Thank you.

Q Of course.

Director Wright, have you had the chance to view the illustrative maps that the Pendergrass and Grant plaintiffs served on the defendants in those cases during the discovery phase of those lawsuits?

A I've reviewed some plans. I'm not sure which plans are which cases by name or what they belong to, but I know that I've looked over some that were a part. I'm not sure which -- which ones they were.

Q Okay. And -- and would those have been maps that you viewed in connection with the preliminary injunction proceedings around this time last year?

A Yes.

Q Okay. Have you viewed additional maps generated by plaintiffs in various suits over the last two months?

A Could you clarify if you mean new or different maps from those?

Q Yes, ma'am.
A No, I have not.
Q Okay. Do you have any reason to believe that you will be called to testify at trial as to your opinion on the maps submitted by any of the plaintiffs in the redistricting cases?
A Could you state that one more time?
Q Sure. Do you have any reason to believe that you will be called to testify at trial as to your opinion on the maps generated by any of the plaintiffs in the redistricting cases?
A I'm not sure what I'll be called to do moving forward.
Q Okay. Or do you have any reason to believe that you will be called to testify at trial on these maps?
A I really don't know.
Q So no one has given you -- obviously excluding any conversations that you've had with your attorney, but no one has affirmatively provided you with any indication that they plan to call you to testify as to those maps?
A I don't know.
Q So you don't know whether anyone has had that conversation with you?
A Oh, I don't know if that is what will happen.

No one has had that conversation with me.

Q Okay. Has anyone, again excluding any conversations that you've had with your attorney, has anyone indicated to you that you will be called to testify at trial in these redistricting cases regarding any other matter?

A I haven't had any conversations about what I might be called to do in the future.

Q Okay. Thank you very much. I appreciate your time.

A Thank you.

MR. JAUGSTETTER: So does anyone else have any questions for Ms. Wright?

MR. SAVITZKY: Hi. This is Ari Savitzky on behalf of the Alpha Phi Alpha plaintiffs.

MR. JAUGSTETTER: Okay.

EXAMINATION

BY MR. SAVITZKY:

Q I just -- I will -- I will try to take even less time than Mr. Jones did, if you don't mind me asking a question or two, Ms. Wright?

A Sure. Go ahead.

Q And I will apologize for my voice. I have two young children at home. The colds are coming in

sequence, so...

A I understand.

Q Yes. I just wanted to ask, you spoke at one point about communities of interest and how you -- about how you implement that as a map drawer. And just a couple of follow-up questions about that.

Could a city or town or sort of geographic community be a community of interest?

A It could be if they defined themselves or felt that they were a community of interest.

Q And let me back up for a second. Would it be fair to say that a community of interest is a community of some shared interest that's capable of representation?

A Are you -- you're saying to define a community of interest?

Q Yeah.

A Yes. I think that that's more or less what it would be, something that has a shared resource or a shared interest of some sort.

Q It could be a shared economic or commercial interest?

A Yes.

Q It could be -- I think you mentioned this earlier, but it could be a connection to a certain, you know, road or transportation infrastructure?

A Transportation sometimes, but I think more often than not, communities of interest are sharing something more, yeah, a little bit more connecting, I think.

Q It could be a shared interest in a school system?

A Yes.

Q It could be shared characteristics of people in a community, folks that work in the same place or have similar needs?

A Sure. There are a lot of ways to define it, I think.

Q Would you consider metropolitan or micropolitan statistical areas, those areas that are defined by the Census, as potential communities of interest?

A Not really. Those are a little larger than what I would think of as a community of interest.

Q Okay. And is it possible when you are thinking about communities of interest, to take into account all of the different communities of interest that might possibly exist in an area?

A Could you say that one more time?

Q Is it possible to take into account all the different communities of interest that you might find or that might exist in an area or --

A Yeah, I think --

Q -- on a map?

A I'm not sure I'm clearly understanding the question, but I think there are possible ways where communities of interest might overlap in certain areas. It could be because they're different -- there are different shared interests in a similar area, so it's very hard to gauge exactly what one might and define as a community of interest. Because in one case they might define themselves as that here, and then other people in that same community might not define themselves as a community.

Q Okay. I don't -- I don't think I have -- actually have any other questions, but thank you so much, Ms. Wright.

A Thank you. Hope you feel better.

MR. SAVITZKY: Thanks.

MR. JAUGSTETTER: Okay. Anybody else on Zoom? Okay. Anybody else in the room?

MR. TYSON: I have some questions. If I can just grab your microphone.

EXAMINATION

BY MR. TYSON:

Q All right, Ms. Wright. Good afternoon.

A Good afternoon.
Q I don't have quite as few questions as the folks on Zoom. I do have some questions for you generally about the process.
A Okay.
Q And I know it's been, as we said, a long day so far.
Just to get a little bit of background, when did you first start drawing redistricting maps?
A December of 2000.
Q So you've been drawing maps over 20 years?
A Yes, 22.
Q And are those maps all Georgia maps?
A Yes. They would be -- I began learning to draw maps with local redistricting, so mostly for counties and cities; and then working as that redistricting cycle, began in some different legislative districts and things like that.
Q How long have you been using Maptitude to draw maps?
A Maptitude is the program we have used the entire time I have worked in the office.
Q Do you have a guess on approximately how many redistricting plans you have drawn?
A I don't have a guess. A lot.

Q Okay. And you've -- have you ever served as a special master for a federal court in map drawing?

A I don't know if I've been a special master, but I've been a technical expert for fed -- for several federal courts.

Q Okay. So I wanted to talk a little bit about the different redistricting cycles, and I wanted to start with the 2011 cycle. Were you involved in the 2011 redistricting process?

A Yes.

Q And do you recall, were there public hearings held in the 2011 redistricting cycle?

A Yes, there were.

Q And were those public hearings held before maps were released to the public?

A Yes, they were.

Q Okay. And then in the 2011 cycle, were there public committee meetings?

A I think most legislative committee meetings are public, so yes.

Q And there -- there was public comment taken at those committee meetings?

A Yes.

Q And do you recall any major differences between the town hall and committee process from 2011 to 2021?

A Well, as I mentioned earlier, the inclusion of an educational video, that was actually my idea. I wanted to provide the people who cared enough to come out to the public hearings the opportunity to learn a little bit about the process, rather than just come up and talk about things without knowing some of the detail or the reasons why we do this. So that video was a new feature to add.

I also -- I don't know if related to the hearings, per se, the Zoom platform is new. We didn't have that before. We have two public hearings on Zoom at this time. That was definitely not something we did ten years before. To allow people to not just watch but also participate from -- from that platform.

I think all of the public hearings were streamed at this time, and I don't know that they were in 2011. They may have been recorded, but I don't know that they were streamed to be able to watch it live as it was taking place. So that was new this time.

And the comment portal we had on the website was also a new feature at this time, to allow people to submit comments, and those comments are actually posted so that they were viewable throughout the whole process. I think the comment portal was left up until through the end of the year, even following the adoption of the maps.

And it actually might still be there now. I'm not even a hundred percent sure if it's still active, but it might be still active now, not to submit, but to at least review comments.

So all of those things were new in 2021 that we did not do or have the ability to do in 2011.

Q Do you recall if the special session timeline was similar in 2011 to 2021, the actual time in special session?

A 2011, the special session was in the summer. It was August, I believe. It was around maybe two, two and a half weeks. It was a relatively short time period. I mean, it was, like I said, in the summer. So 2021, we were in session. Maybe -- I don't know if it was exact. Maybe a little longer than that or around that time period, but it was in November as opposed to August, so much later in the year.

Q Okay. What was generally your role in the redistricting process in 2011?

A Similar to what it was this time. I worked on drawing those maps, worked with the legislators to draw the -- the statewide maps for the Senate and Congressional and a large portion of the House map in 2011.

Q Did you follow a similar process in drawing the

House, Senate, and Congressional plans in 2011 as you followed and you described in 2021?

A Yes, I would say it's a similar process.

Q And you were also present in the 2001 redistricting cycle, right?

A Yes.

Q And do you recall if there were public hearings in the 2001 redistricting cycle?

A Yes, there were.

Q Okay. And there were public committee meetings as well?

A Yes.

Q Okay. Do you recall that a number of legislators were paired in the same district during the 2021 redistricting cycle?

A Yes.

Q And do you recall, were those primarily Republican members?

A There were a significant number of Republican members that were paired on those maps. The House map was a multi-member map, so it had districts that encompassed more than one incumbent in them, and sometimes more incumbents than even needed to fit in them. But we only had, I think, 147 districts instead of 180 because of that.

Q So coming forward into -- back into 2021 cycle, can you just explain briefly about what happens on the legislative plan -- let me ask this. Do districts move from one part of the state to another part of the state, for example, on the Senate plan when you are drawing a new redistricting plan?

A Yes, they -- they do. Sometimes it's referred to as collapsing a district. Sometimes I've heard that terminology. But if there's not enough population to keep a district in a certain location, then sometimes the districts surrounding it will take parts of that district. Then it's relocated and drawn in an area where there is a lot more population growth on the map. It is the way -- the way the Senate has bizarre numbering and doesn't seem to follow a pattern, that's the reason.

Q That's what I was going to ask about. You mentioned Senate District 7 in your discussion with Mr. Canter earlier. Where was Senate District 7 before the 2021 map was drawn?

A Senate District 7 was in south Georgia, kind of south central Georgia, a little bit close to the Waycross area and kind of up, and now it's in Gwinnett County.

Q And is a district moving from south Georgia to north Georgia like that a function of the population shifts that happen?

A Yes.

Q So you mentioned it was the -- the districts moving was the cause of the crazy Senate numbering. What are you referring to with that?

A So traditionally, the Senate districts were numbered, and starting in the Savannah area where -- that's where our state began and grew from that Savannah area -- area outward. So the numbers, that's why 1 and 2 are still in Chatham County, and they numbered across the bottom and then worked their way up.

As the state grew, then we weren't able to maintain those same districts across the southern part of the state, so the numbers that you see in the Metro Atlanta area, as we said, they collapsed those districts. They moved them up into that part of the state, and the numbering is a little more scattered.

We still have -- you know, there is the 50s up at the top left corner, and the low numbers starting at the very bottom, but there are a lot of scattered numbers in between, especially in Metro Atlanta as a result of that.

Q Is the numbering system different for the House plans?

A Yes, it is.

Q And how is it different from the Senate?

A Traditionally, we renumber the House plan following finalizing a map. And it follows a pattern from the top left, moving towards the bottom right, trying to, number one, if I can maintain the same district numbers that were there previously, that does help with a lot of things in the counties for the elections, and also for the members. But I renumber to try and keep delegations in similar numbering patterns and things like that as it moves through. It's not a perfect science, but that is traditionally what we do in the House.

Q So is it unusual for House District numbers to change for Georgia voters following a Census and a redraw of the maps?

A No, that's not unusual.

Q You talked to Mr. Canter a little bit about the political data that you had available and the process of, I guess, disaggregating or imputing that data to blocks.

Do you recall that?

A Yes.

Q And so is it correct then that if you were looking at Census block data, each Census block has political data in it even though it's an estimate, right?

A Right. As you move blocks, you would see a change in not just demographic data but also in political

data as you move those blocks.

Q And when drawing the maps, you talked about different meetings with groups. Let's start with the -- the Senate groups that you met with. Was the political data for each district an important consideration for the members when they were drawing the maps?

A Yes.

Q And for the House maps, was that also -- was political data also an important consideration?

A Yes.

Q And for the congressional maps in that leadership meeting, was political data an important consideration?

A Yes.

Q Mr. Canter talked with you about the -- the different factors of redistricting that the committee adopted.

Do you recall that?

A Yes.

Q Can you just describe briefly, as a map drawer, how do you go about trying to balance -- because I'm assuming there is a competing interest between a lot of those different factors. How do you go about approaching balancing those different factors?

A It's very difficult, and in certain situations

you may have to give on one factor to accommodate another factor. For instance, maybe population requires that I have to divide a county because I can't fit this entire county into this district as it is, and the -- and the district nearby needs additional population. So although I would prefer to keep that county whole and intact, I might have to divide it so that the population is balanced between the two.

But it is a give and take. There is not a specific method or rhyme or reason as to how you choose what takes precedence in any given situation. And sometimes that's driven by what the legislator is asking for.

Q And so it becomes, at some level, a policy decision of which one the legislator wants to prioritize in that situation?

A Yes, it can.

Q Mr. Canter talked with you about using the different racial data available to you, and Maptitude will allow you to color a district by the racial makeup of the population; is that right?

A Can you say that one more time?

Q Yeah. Let me ask it this way.

Does Maptitude allow you to color different parts of the district by the racial makeup of the

population in that area?

A You could create a theme that would do that, I think using the data, whatever field you selected, and -- and setting a theme that way, yes, you could.

Q In drawing the House, Senate, and Congressional plans, did you ever use a theme of racial coloring on a map?

A No, I did not.

Q We talked a little bit, too, about discussions with the House Democratic Caucus. Did you meet with members of the Democratic party and work on redistricting maps for members of the Democratic party in the 2021 cycle?

A Yes.

Q And so those legislators had equal access to your office if they wanted to come in and draw a map?

A Yes.

Q And do you recall ever receiving a request from the House or Senate Democratic Caucus that your office was not -- did not respond to and provide information in response to?

A Are you asking -- can you say that one more time?

Q Sure. So you mentioned Shalamar -- and I'm forgetting her last name.

A Parham.

Q Ms. Parham with the House Democratic Caucus requesting data. Do you recall ever receiving a request from Ms. Parham for data that your office did not provide the data to her?

A No, I do not.

Q You mentioned as well that you had listened to all the public comment at hearings, which I know was a lot.

A Yes.

Q Did you include items that you heard in public comment when you were working on the blind maps in the early drafts of the drawing process?

A Yes.

Q And what are some examples of those, if you remember any?

A Well, we talked about Pickens County specifically already. That's definitely something that was considered.

Another example, Montgomery and Toombs County spoke. There were quite a few people who came to the hearing there in Macon to talk about keeping those two counties together. They share a lot of common resources, and I think one of their cities straddles the county line, and they requested that they be kept together.

I don't know how many examples you want. I can probably go on. There is quite a few. Even individuals that had requested certain things, you know, about where they live or not having their precinct put into a district that didn't have someone representing it from their county because they felt like they wanted that local representation, I was able to accommodate that as well.

Other communities that had goals and things that they requested, where I could, I would try to incorporate those into the maps. It's not a perfect art, but we do try to listen, and I do try to include and incorporate those things.

Q In your 20 years or over 20 years of redistricting experience, have you ever seen a statewide map that everybody -- that every voter was happy with?

A No.

Q I wanted to ask you, you mentioned that Congressman Bishop had called you as well. Did you provide any information to Congressman Bishop he requested or was he just calling to check in?

A He actually came to the office, and I met with him at the office and gave him some information. This was -- I believe it was before the Census data came out or right after that but before any maps had been

produced, but we did give him some maps of his district and information.

Q Okay. Do you recall any organizations releasing what were called the "unity maps" during the course of the special session?

A I do recognize that.

Q Do you know if the unity maps were ever introduced by any legislator for consideration by the legislature?

A They would have had to come through my office to be created into a format to be entered into a bill, and that would require a legislator to do so. So no, I never had a legislator bring that file in a format -- in the format that the committee guidelines spelled out to -- to create for a bill.

Q Ms. Wright, that's all the questions I have for you. Thank you so much.

A Uh-huh.

MR. JAUGSTETTER: Okay. If there's nothing else?

MR. DAVIS: Give us two seconds.

MR. JAUGSTETTER: Two seconds. Okay.

MR. DAVIS: No, nothing else. Not from us, at least.

MR. CANTER: We are good.

MR. JAUGSTETTER: All right.

THE VIDEOGRAPHER: This concludes the deposition. The time is 4:26. We are going off the video record.

THE REPORTER: Does anybody on Zoom need a copy of the transcript?

MR. SAVITZKY: Yes, we would like one.

THE REPORTER: Did you need a rough draft?

MR. JAUGSTETTER: Yeah, please.

(The deposition concluded at 4:26 p.m.)

The following reporter and firm disclosures were presented at this proceeding for review by counsel:

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- I have no relationship of interest in the matter on which I am about to report which would disqualify me from making a verbatim record or maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.
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C E R T I F I C A T E

STATE OF GEORGIA)
) ss:
COUNTY OF DEKALB)

I HEREBY CERTIFY that the foregoing transcript was taken before me; that I was then and there a Registered Professional Reporter and Registered Merit Reporter, License No. 6595-1471-3597-5424 for the State of Georgia, and License No. 14315 in the State of California; that the witness before testifying was duly sworn by me to testify to the whole truth; that the questions propounded by counsel and the answers of the witness thereto were taken down by me in shorthand and thereafter transcribed under my direction; and that the foregoing pages contain a full, true, and accurate transcript of all deposition testimony and proceedings had, all done to the best of my skill and ability.

I FURTHER CERTIFY that I am in no way related to, nor employed by any of the parties hereto, nor am I in any way interested in the outcome.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

DATED at Dunwoody, Georgia, this 8th day of February, 2023.

MARCELLA L. DAUGHTRY, RPR, RMR
GA License No. 6595-1471-3597-5424
CA CSR 14315

To: Mr. Patrick Jaugstetter, Esq.
Re: Signature of Deponent GINA WRIGHT
Date Errata due back to our offices: 30 days
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ERRATA for Assignment #5667915

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

There are no changes noted.

The following changes are noted:

Pursuant to Rule 30(7)(e) of the Federal Rules of Civil Procedure and/or OCGA 9-11-30(e), any changes in form or substance which you desire to make to your testimony shall be entered upon the deposition with a statement of the reasons given for making them. To assist you in effecting corrections, please use the form below. If additional pages are necessary, please furnish same and attach.

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DEPONENT'S SIGNATURE

Sworn to and subscribed before me, this_____day of

_____, 20_____.

Notary Public

My commission expires:

&

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

ALPHA PHI ALPHA FRATERNITY INC., *et al.*, *Plaintiffs*, v. BRAD RAFFENSPERGER, *Defendant*.	CIVIL ACTION FILE NO. 1:21-CV-05337-SCJ
COAKLEY PENDERGRASS, *et al.*, *Plaintiffs*, v. BRAD RAFFENSPERGER, *et al.*, *Defendants*.	CIVIL ACTION FILE NO. 1:21-CV-05339-SCJ
ANNIE LOIS GRANT, *et al.*, *Plaintiffs*, v. BRAD RAFFENSPERGER, *et al.*, *Defendants*.	CIVIL ACTION FILE NO. 1:22-CV-00122-SCJ

DECLARATION OF GINA WRIGHT

EXHIBIT
1

Pursuant to 28 U.S.C. § 1746 and F.R.E. 702 and 703, I, GINA WRIGHT, make the following declaration:

1.

My name is Gina Wright. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.

2.

I am the Executive Director of the Legislative and Congressional Reapportionment Office (LCRO), a joint office of the Georgia General Assembly. The LCRO is responsible for providing redistricting services to legislators using data obtained from the United States Census Bureau. The LCRO assists the General Assembly in drawing the districts of the State Senate and State House of Representatives, the Public Service Commission, as well as the fourteen (14) United States Congressional districts. Through sponsorship from a legislator, the LCRO also assists local County Commissions, Boards of Education, and City Councils in adjusting their districts. Finally, the LCRO also provides an array of maps and data reports to both legislators and the public at large.

3.

As Executive Director, I oversee and direct a staff of six (6) in providing redistricting and other mapping services to the Georgia General Assembly. These services may include drawing maps for statewide legislative districts, local redistricting plans, city creation boundaries, annexations and de-annexations, as well as precinct boundary changes. All local redistricting bills through the House Committee on Intragovernmental Coordination require my signature following a technical review of the bill. I am the official state liaison for Georgia for the 2020 Census Redistricting Data Program. I oversee the creation of our statewide voting precinct mapping layer through my work with all county election officials throughout the state. I assist the Office of the Attorney General in candidate qualification challenges related to issues regarding a candidate's residency.

4.

I regularly assist federal courts as an expert or technical advisor in redistricting matters. I participate in the Redistricting and Elections Standing Committee of the National Conference of State Legislatures and contribute to their databases and publications. Finally, I participate as a presenter in statewide forums such as the The Georgia Association of Voter Registrars and Elections Officials Association, the

Georgia Municipal Association (the "GMA"), the Association of County Commissioners in Georgia (the "ACCG") and the Georgia Legislative CLE class.

5.

I began work with the LCRO in December of 2000 as a Redistricting Services Specialist. I became Executive Director of the LCRO in June 2012. I am a 2000 summa cum laude graduate from Georgia State University. I have a Bachelor of Arts degree in Political Science and a minor in Spanish.

6.

I have been appointed as an expert or technical advisor for redistricting by federal courts in the following cases:

- *Ga. State Conf of the NAACP v. Fayette County Bd. of Comm'rs*, 996 F. Supp. 2d 1353, 1359 (N.D. Ga. 2014) (appointed as the Court's "independent technical advisor."); *see also Ga. State Conf of the NAACP v. Fayette County Bd of Comm'rs*, 118 F. Supp. 3d 1338, 1340 (N.D. Ga. 2015) ("Court-appointed expert or technical advisor.")
- *Crumly v. Cobb County Bd. of Elections & Voter Registration*, 892 F. Supp. 2d 1333, 1344 (N.D. Ga 2012) (appointed as the "Court's technical advisor and consultant.")

- *Martin v. Augusta-Richmond County*, 2012 U.S. Dist. LEXIS 85113, *2-3 (S.D. Ga 2012) (appointed by Court as "advisor and consultant.")
- *Walker v. Cunningham*, 2012 U.S. Dist. LEXIS 178337, *5 (S.D. Ga. 2012) (appointed by Court "as its independent technical advisor.") (3 judge panel).
- *Bird v. Sumter County Board of Educ*., CA No. 1:12cv76-WLS (M.D. Ga. 2013) ECF 70 p. 5 (appointing Gina Wright as the Court's "independent technical advisor.")
- *Adamson v. Clayton County Elections and Reg. Bd*., CA No. 1:12cv1665-CAP (N.D. Ga. 2012), ECF 23 p. 2 (appointing Gina Wright as the Court's "independent technical advisor.")

In the past several years I have testified, either at trial or by deposition, in:

- *NAACP v. Kemp*, CA No. 1:17cv1427 (N.D. Ga.) (3 judge court) (consolidated with *Thompson v. Kemp*).
- *Ga. State Conf. of the NAACP v. Fayette County Bd. Of Comm'rs*.

7.

I am not being compensated separately for my work in this matter.

8.

In preparing my analysis, I considered the following facts and data: block equivalency files of five redistricting plans: one state Senate plan by William Cooper

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in Alpha Phi Alpha called ILLUSTRATIVE_PLAN_2_BEF_Senate; one state House plan by William Cooper called ILLUSTRATIVE_PLAN_2_BEF_HOUSE; one Congressional plan by William Cooper called Pendergrass v. Raffensperger Illustrative_Plan Modified_Districts Block Equivalency; one state Senate plan by Blakeman Esselstyn called Grant v. Raffensperger Illustrative Plans Shapefile; and one state House plan by Blakeman Esselstyn called Grant v. Raffensperger Illustrative Plans Shapefile. I also relied on the 2020 PL-94-171 Census Data and Geography files for the state of Georgia; past state House, state Senate, and congressional district maps for the state of Georgia maintained by my office; the 2020 enacted plans for state House, state Senate, and Congress; precinct data from our office on voter registration; and my personal knowledge of the facts regarding redistricting in Georgia. In preparation for rendering my opinions, I reviewed the entire plans.

9.

Based on my analysis, the districts discussed below in the remedial plans do not comply with traditional redistricting principles, in some districts unite disparate communities in Georgia solely on the basis of race, and would cause significant changes from the 2020 enacted plans if used as remedial plans by a court. My

analysis is explained below and I reserve the right to add to this analysis if called on to testify further.

Cooper State Senate Plan

10.

The Cooper State Senate plan adds majority-Black districts using the any-part Black voting age population Census metric when compared to the adopted House plan. Six of the new districts created in the Cooper State Senate have Black voter registration of less than 50%.

11.

The proposed District 23 unites disparate communities apparently based on race. The district barely crosses 50% any-part Black voting age population and only achieves that number by connecting Black voters in Augusta with Black voters in Milledgeville and Warner Robins. District 23 as drawn is below 50% on Black voter registration. There is no basis to connect Augusta with Warner Robins in a Senate district if not for the race of the individuals in the districts. The proposed District also adds minority population to District 22 and takes it far outside its traditional boundaries in Richmond County.

12.

The proposed District 28 splits multiple counties with the goals of achieving majority black status. It unites areas of Jonesboro with areas south of Griffin, apparently for the purpose of including the Black population in Griffin. This splist Spalding County into two districts, where it is currently not split. Further, creating District 28 results in connecting Jonesboro to the eastern side of Spalding in District 44. This also bears no connection to any type of a community. Coweta County was previously, the new district configuration will results in the division of Coweta County into three districts (16, 35 and 29) which are apparently based on race. I cannot identify a reason for drawing District 28 aside from a purely racial goal. District 28 also has a Black voter registration of less than 50%.

13.

The proposed District 17 connects the black population in Stonecrest to the Ola and Lake Dow communities in Henry County. Stonecrest shares few if any characteristics with the Ola and Lake Dow communities in Henry County and I cannot identify any community of interest that supports the creation of this district. It also splits a large neighborhood in Lake Haven with no apparent reason for doing so.

14.

In short, the additional districts this plan proposes appear to be drawn based on race.

Cooper State House Plan

15.

The Cooper state House plan adds a number of majority-Black districts, including Districts 73, 110 and 144, using the any-part Black voting age population Census metric when compared to the adopted House plan.

16.

The proposed District 73 uses Black population in south Clayton and combines those with Black population in Griffin to create a district. It creates significant changes to surrounding Districts like 78 and 109 by connecting communities that share little to no common interests. Clayton County's boundary was respected in both the adopted House plan and the Democratic House proposal. This new District 73 and its surrounding districts break county boundaries in apparent service of a racial goal.

17.

Nearby District 110 barely goes over a majority district by combining Black population in Griffin with parts of Locust Grove in Henry County. Spalding County

has traditionally only had two House districts but this configuration would result in four districts within the county boundaries (73, 110, 129 and 130). As a result of creating District 110, the Cooper Plan revises District 111 in a way that that splits a number voting precints with no apparent goal other than to create a majority black district. Similarly, the configuration of District 129 is spread among five counties. I have not separately analyzed incumbents, but am aware of a number of incumbents in this area who could be affected.

18.

District 144 unites disparate communities in a single district. It uses Black population in the cities of Eatonton and Milledgeville and the counties of Hancock and Wilkinson to achieve a district that is barely over 50% any part Black voting age population. District 144 further divides Twiggs and Wilkinson counties into different districts; they have historically been in the same district as they constitute a single community of interest. The districts drawn in the adopted House plan in the same area respect county boundaries and communities of interest and avoid the unnecessary division of counties for racial purposes as Cooper's District 144 does.

19.

Southwest Georgia was a significant challenge because it was the area of the state with the most underpopulated districts. The Cooper plan's reconfiguration of

the area, specifically District 138, results in multiple split counties and connecting areas that have nothing in common, like Columbus, Americus and Junction City or Thomasville and Albany. I cannot identify a community of interest or purpose for configuring southwest Georgia as this plan does; it also appears to pair additional incumbents. Further, the plan does not address some public comments like reducing the number of splits in Tift County.

Esselstyn State Senate Plan

20.

The Esselstyn Senate plan also adds majority-Black districts above the adopted Senate plan when using the any-part Black voting age population Census metric.

21.

District 23 divides Baldwin County, Greene County, and Wilkes County, and still only achieves 50.43% AP Black VAP. It is below 50% Black voter registration. It shifts the district significantly west instead of keeping it an east Georgia District. Given the low Black VAP, the specificity of the splits, and the shape of the district, it appears to be drawn with a racial goal in mind.

22.

District 28 is made up of parts of four counties, Fulton, Coweta, Fayette and Clayton and includes parts of Riverdale in Clayton County and Newnan in Coweta County. Riverdale and Newnan have little in common and do constitute a community of interest.. This configuration splits Clayton County into four districts in a manner that make no geographic sense apart from a racial goal. Clayton County has traditionally been split into two districts; this plan would split the County into four districts.

23.

District 25 is at least more compact, but strategically connects pieces of south Clayton with Henry apparently in service of a racial goal. The side effect of making a compact District 25 impacts nearby Districts, including District 10 not being a community of interest, reaching all the way up to Stonecrest in the north and down to the Butts-Monroe County line in the south. I cannot imagine a non-racial purpose in creating this district.

Esselstyn State House Plan

24.

The Esselstyn House plan adds majority-Black districts above the adopted House plan when using the any-part Black voting age population Census metric.

25.

District 149 splits Baldwin County three ways, and barely reaches 50%--crossing that threshold by two-hundredths of a point. The three-way division of Baldwin makes no sense and is not at all compact. Further, connecting a small portion of Milledgeville with Macon in a single House district lacks any coherent community.

26.

District 145 is relatively compact, but a side effect of this configuration requires significant changes to the configuration of north Macon, placing parts of Macon together that encompass separate communities. This configuration of Bibb County significantly divides the minority population in the central part of the county and goes directly against the public testimony that was provided during the Macon Town Hall meeting conducted to receive public comment regarding the General Assembly's redistricting efforts.

27.

Districts 74 and 117 suffer from the same problems I outlined above regarding Cooper House District 73 and 110. Districts 74 and 117 are both below 50% Black on voter registration. It is also unusual that District 116 follows the interstate except

to take a single precinct across the interstate that likely has racial implications for District 117.

28.

District 64 only achieves minority status by connecting communities in Fulton County with communities in Paulding County. It is below 50% Black on voter registration and pulls District 66 below 50% Black on voter registration. The configuration of District 61 also runs an extremely long distance connecting East Point and parts west of Douglasville, which would not be a community of interest.

Cooper Congressional Plan

29.

I cannot explain the decision to take District 6 into Fayette County. The district is below 50% Black on voter registration and only barely over the 50% threshold on any part Black. District 6 specifically grabs Black voters near Acworth and Kennesaw State University to connect them with other Black voters in South Cobb, Douglas, and Fulton Counties. Likewise, District 13 reaches into Newton County in an unusual way that cannot be explained by normal redistricting principles. The divisions of Cobb, Fayette, and Newton Counties do not make sense as part of normal redistricting principles and I can only conclude that the drawing of this district in service of some kind of specific goal.

30.

I reserve the right to continue to supplement this report in consideration of additional facts, testimony, or materials that may be produced.

[Signature on next page]

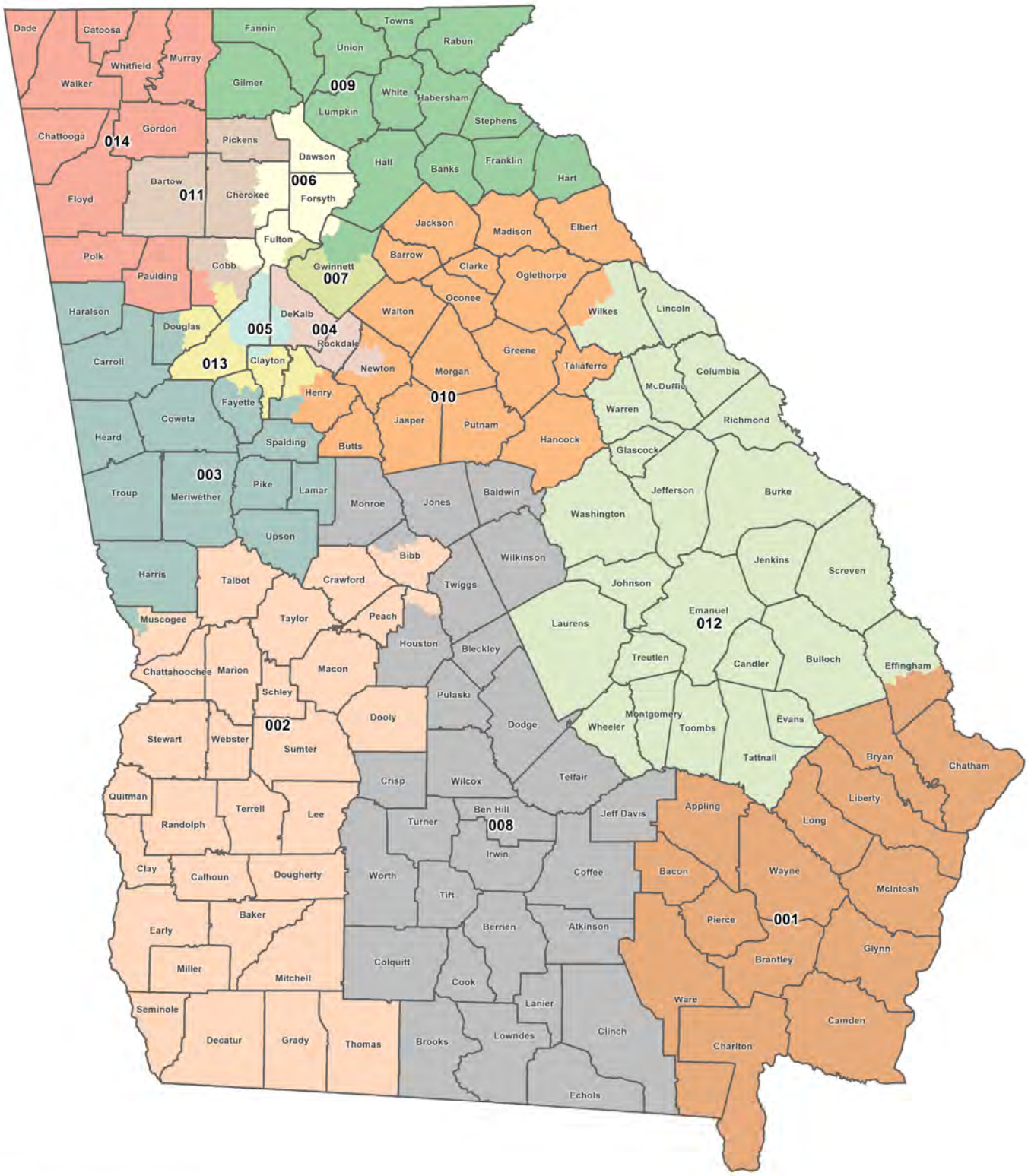
I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of February, 2022.

GINA WRIGHT

Client: State
Plan: Congress-prop1-2021
Type: Congress

Congressional Districts of Georgia- 2022



Legislative and Congressional Reapportionment Office
Georgia General Assembly
Suite 407 Coverdell Legislative Office Bldg.

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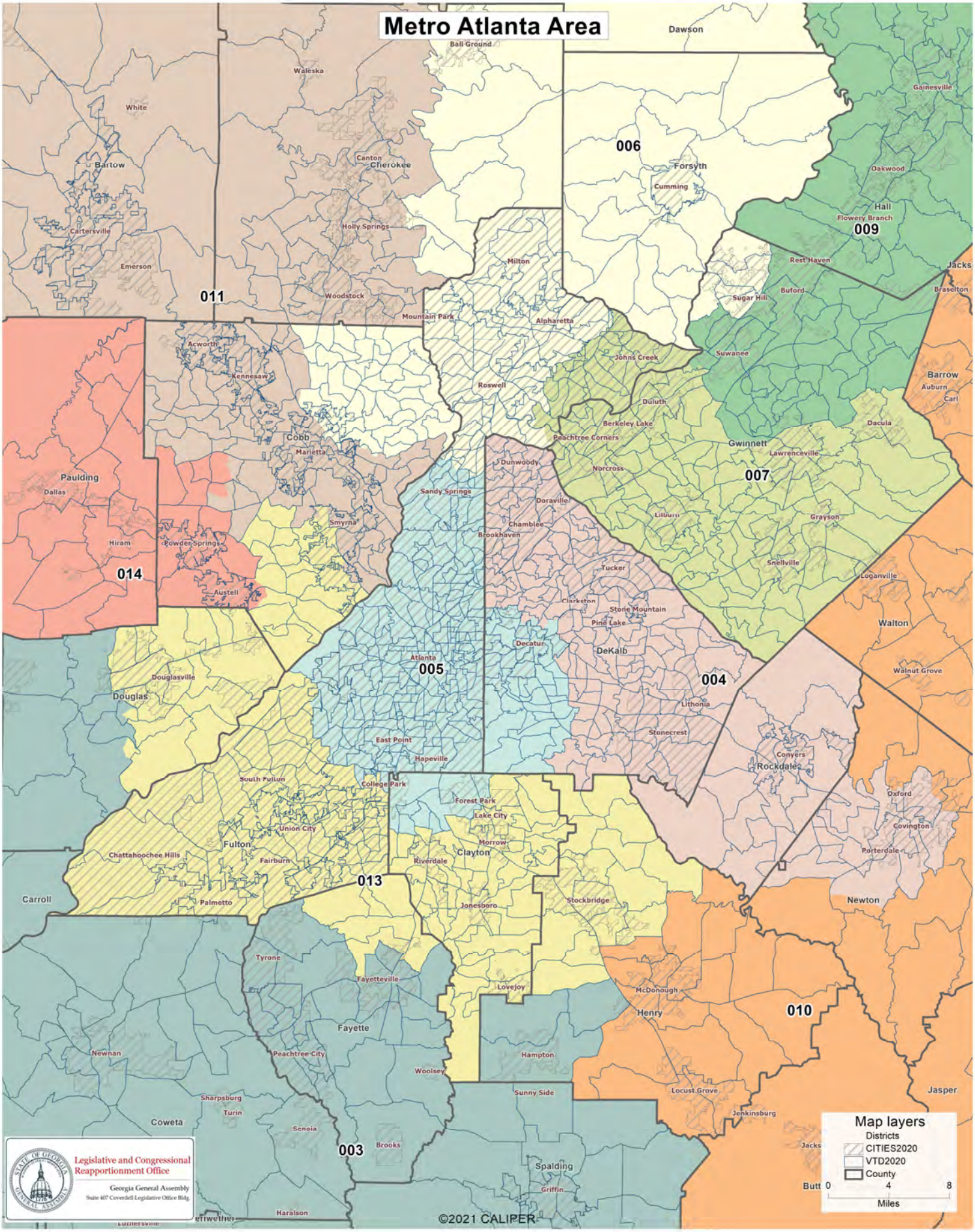
EXHIBIT
2

Map layers
Districts
County
0 20 40
Miles

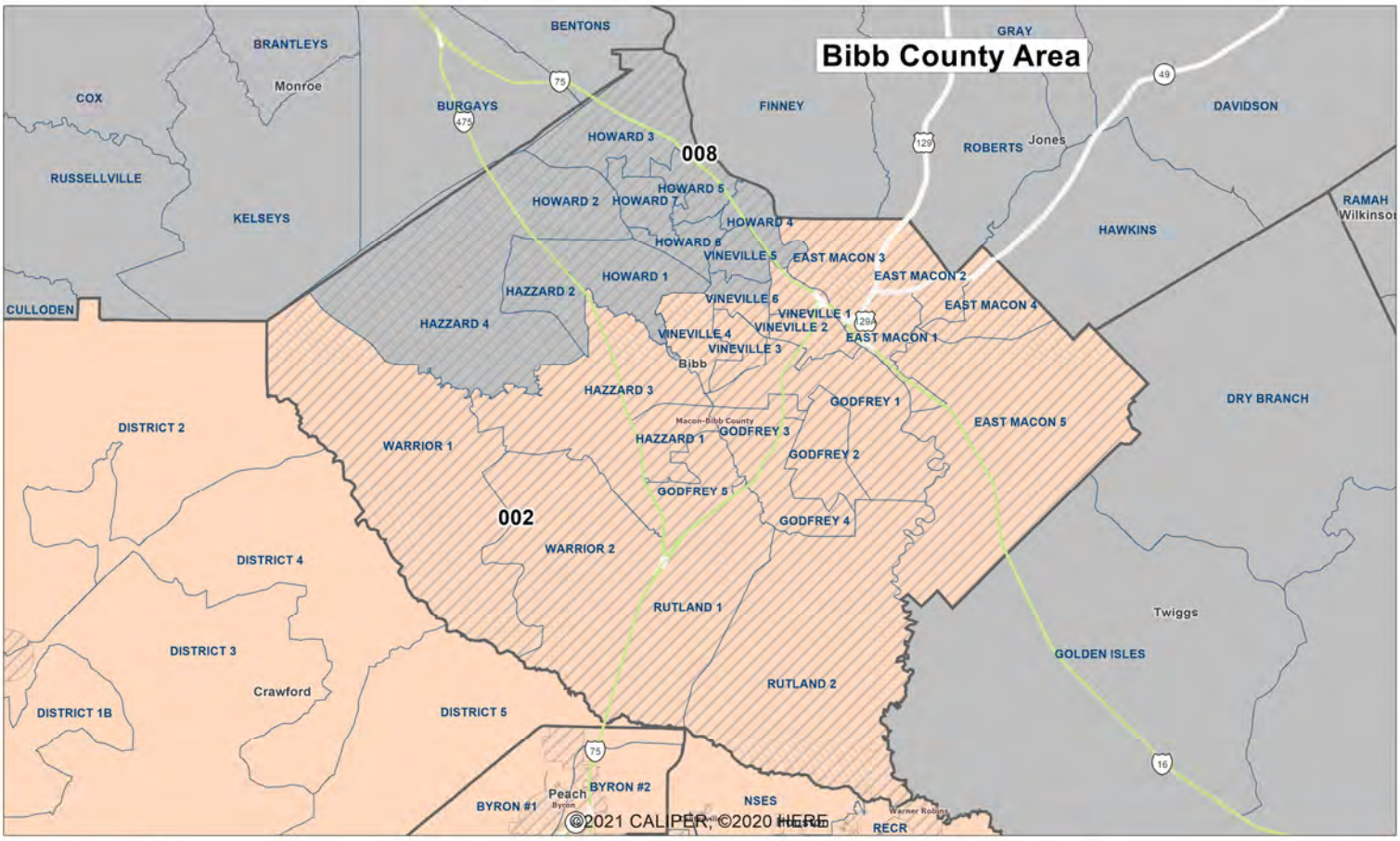
Client: State
Plan: Congress-prop1-2021
Type: Congress

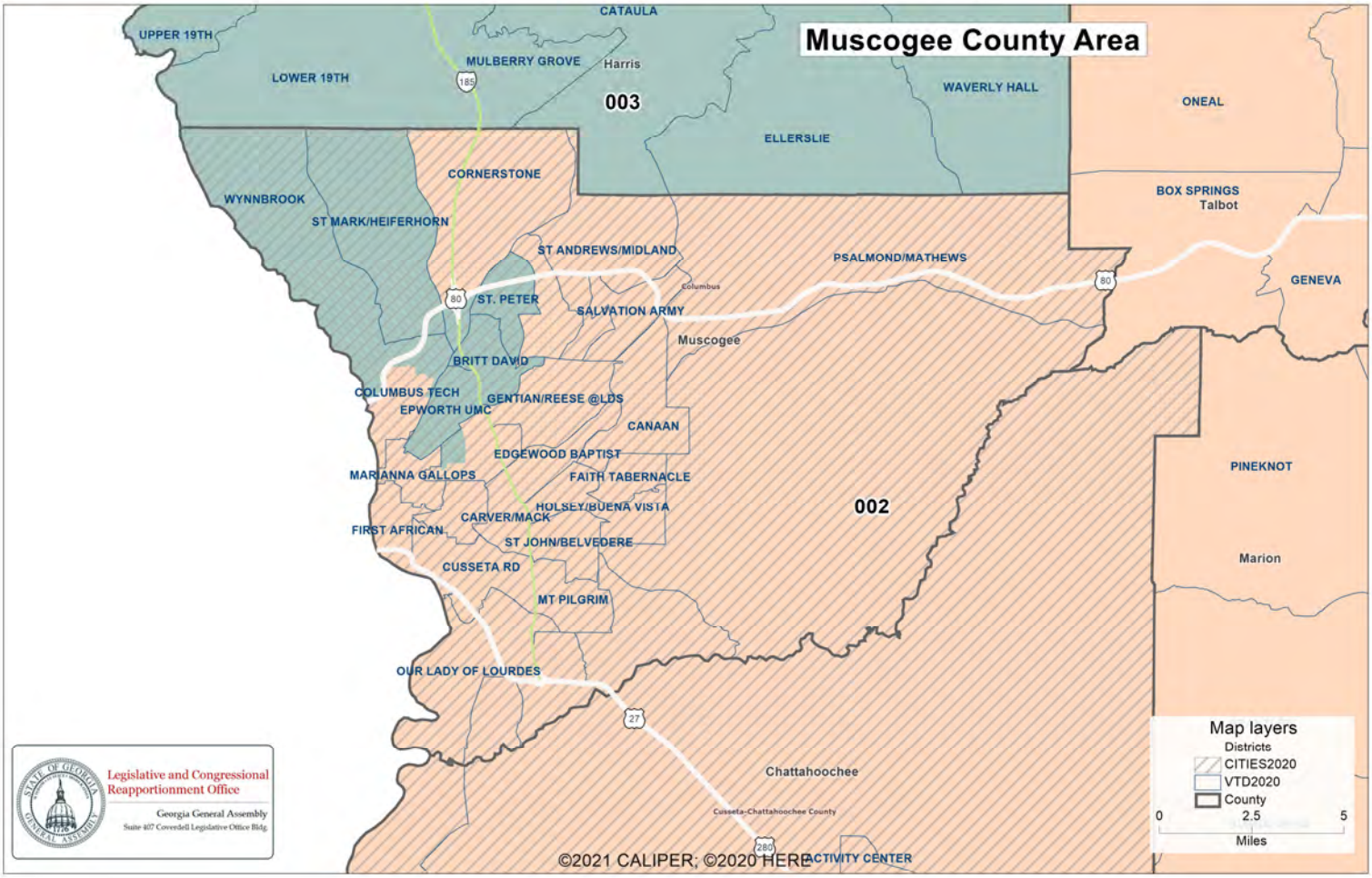
Congressional Districts of Georgia- 2022



Congressional Districts of Georgia- 2022

Client: State
Plan: Congress-prop1-2021
Type: Congress





User: State
Plan Name: Congress-prop1-2021
Plan Type: Congress

Population Summary

Summary Statistics:

Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.71
Relative Mean Deviation:	0.00%
Standard Deviation:	0.80

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blk]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	765,137	1	0.00%	589,266	77.01%	57.59%	27.54%	7.75%	2.19%	0.24%	0.16%	0.44%	4.1%
002	765,137	1	0.00%	587,555	76.79%	39.94%	49.03%	5.95%	1.34%	0.21%	0.1%	0.34%	3.09%
003	765,136	0	0.00%	586,319	76.63%	64.37%	22.61%	6.31%	2.09%	0.21%	0.04%	0.47%	3.91%
004	765,135	-1	0.00%	589,470	77.04%	25.82%	52.19%	11.63%	6.13%	0.16%	0.04%	0.65%	3.39%
005	765,137	1	0.00%	621,515	81.23%	35.79%	48.53%	7.38%	4.09%	0.16%	0.04%	0.52%	3.49%
006	765,136	0	0.00%	574,797	75.12%	63.7%	8.58%	10.23%	12.4%	0.16%	0.04%	0.69%	4.21%
007	765,137	1	0.00%	566,934	74.1%	29.52%	28.11%	23.77%	14.26%	0.16%	0.04%	0.69%	3.45%
008	765,136	0	0.00%	585,857	76.57%	57.91%	29.72%	7.17%	1.56%	0.19%	0.05%	0.31%	3.09%
009	765,137	1	0.00%	592,520	77.44%	64.7%	9.72%	15.39%	5.95%	0.2%	0.04%	0.42%	3.59%
010	765,135	-1	0.00%	588,874	76.96%	63.58%	22.12%	7.66%	2.26%	0.17%	0.04%	0.53%	3.63%
011	765,137	1	0.00%	595,201	77.79%	61.33%	16.33%	13.04%	3.76%	0.19%	0.04%	0.82%	4.49%
012	765,136	0	0.00%	588,119	76.86%	52.13%	36.12%	5.63%	1.83%	0.21%	0.11%	0.36%	3.61%
013	765,137	1	0.00%	574,789	75.12%	16.35%	64.26%	12.23%	3.17%	0.18%	0.05%	0.66%	3.1%
014	765,135	-1	0.00%	579,058	75.68%	68.07%	13.58%	12.69%	1.14%	0.22%	0.05%	0.4%	3.85%

Total: **10,711,908**
Ideal District: **765,136**

User: State
Plan Name: Congress-prop1-2021
Plan Type: Congress

Population Summary

Summary Statistics:

Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.71
Relative Mean Deviation:	0.00%
Standard Deviation:	0.80

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	765,137	1	0.00%	589,266	77.01%	60.41%	26.44%	6.78%	2.36%	0.26%	0.14%	0.37%	3.24%
002	765,137	1	0.00%	587,555	76.79%	42.73%	47.62%	5.12%	1.41%	0.23%	0.09%	0.28%	2.53%
003	765,136	0	0.00%	586,319	76.63%	66.83%	22%	5.33%	2.08%	0.22%	0.04%	0.38%	3.11%
004	765,135	-1	0.00%	589,470	77.04%	28.25%	51.79%	10.12%	6.09%	0.16%	0.04%	0.58%	2.96%
005	765,137	1	0.00%	621,515	81.23%	37.92%	47.14%	6.67%	4.53%	0.16%	0.04%	0.48%	3.07%
006	765,136	0	0.00%	574,797	75.12%	66.63%	8.61%	9.11%	11.44%	0.14%	0.04%	0.63%	3.41%
007	765,137	1	0.00%	566,934	74.1%	32.78%	27.35%	21.27%	14.97%	0.16%	0.04%	0.59%	2.85%
008	765,136	0	0.00%	585,857	76.57%	60.52%	28.84%	6.1%	1.6%	0.2%	0.05%	0.25%	2.43%
009	765,137	1	0.00%	592,520	77.44%	68.29%	9.37%	12.89%	5.94%	0.21%	0.03%	0.34%	2.92%
010	765,135	-1	0.00%	588,874	76.96%	66.2%	21.34%	6.51%	2.3%	0.19%	0.03%	0.46%	2.98%
011	765,137	1	0.00%	595,201	77.79%	63.99%	16.25%	11.22%	3.82%	0.2%	0.04%	0.75%	3.73%
012	765,136	0	0.00%	588,119	76.86%	54.65%	35.06%	4.87%	1.95%	0.22%	0.1%	0.3%	2.86%
013	765,137	1	0.00%	574,789	75.12%	18.82%	63.75%	10.52%	3.38%	0.19%	0.05%	0.61%	2.68%
014	765,135	-1	0.00%	579,058	75.68%	71.33%	13.14%	10.58%	1.17%	0.23%	0.04%	0.32%	3.2%

Total: **10,711,908**
Ideal District: **765,136**

Prior Congressional District 6 Boundaries

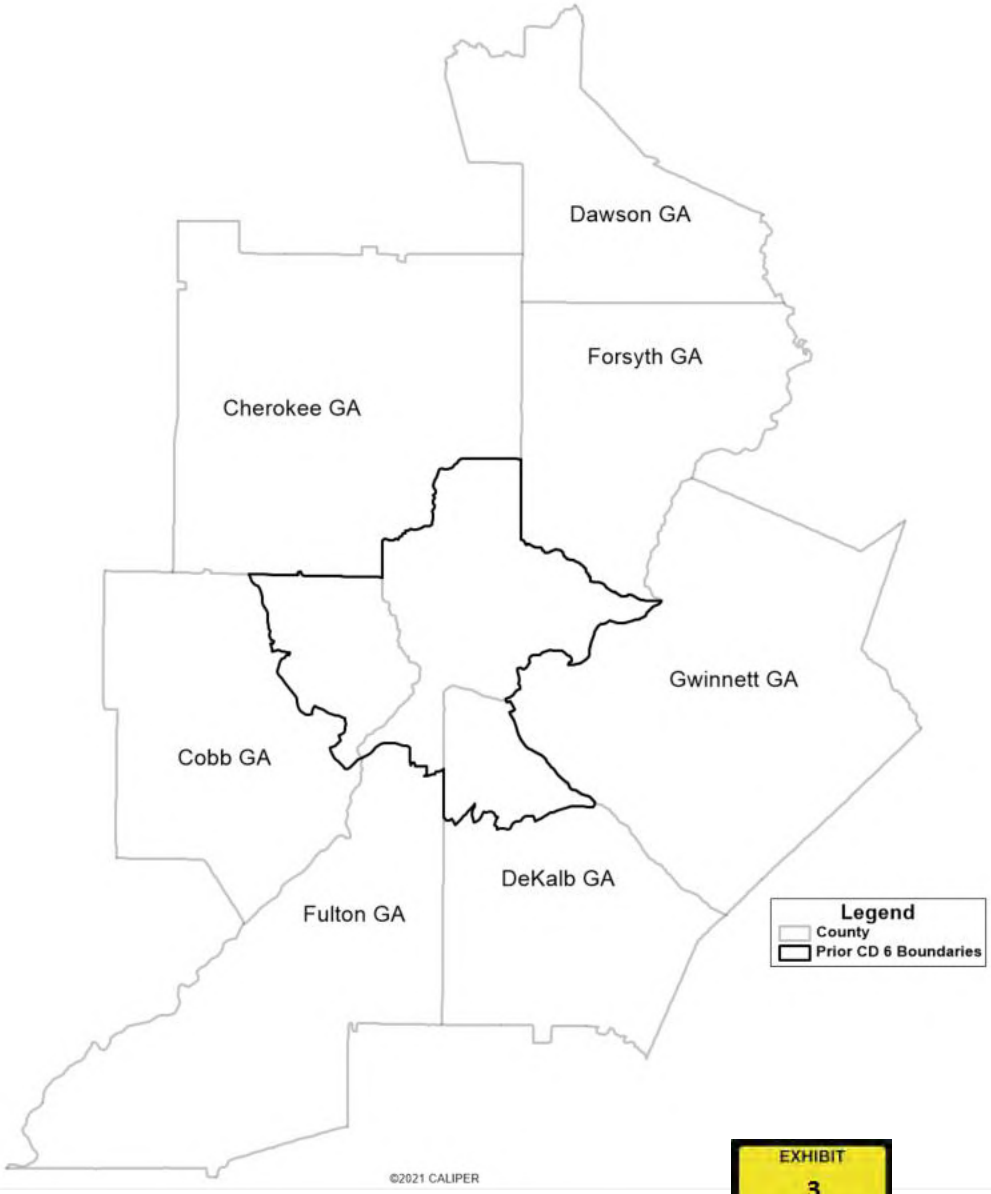


EXHIBIT
3

S.B. 2EX Congressional District 6 Boundaries

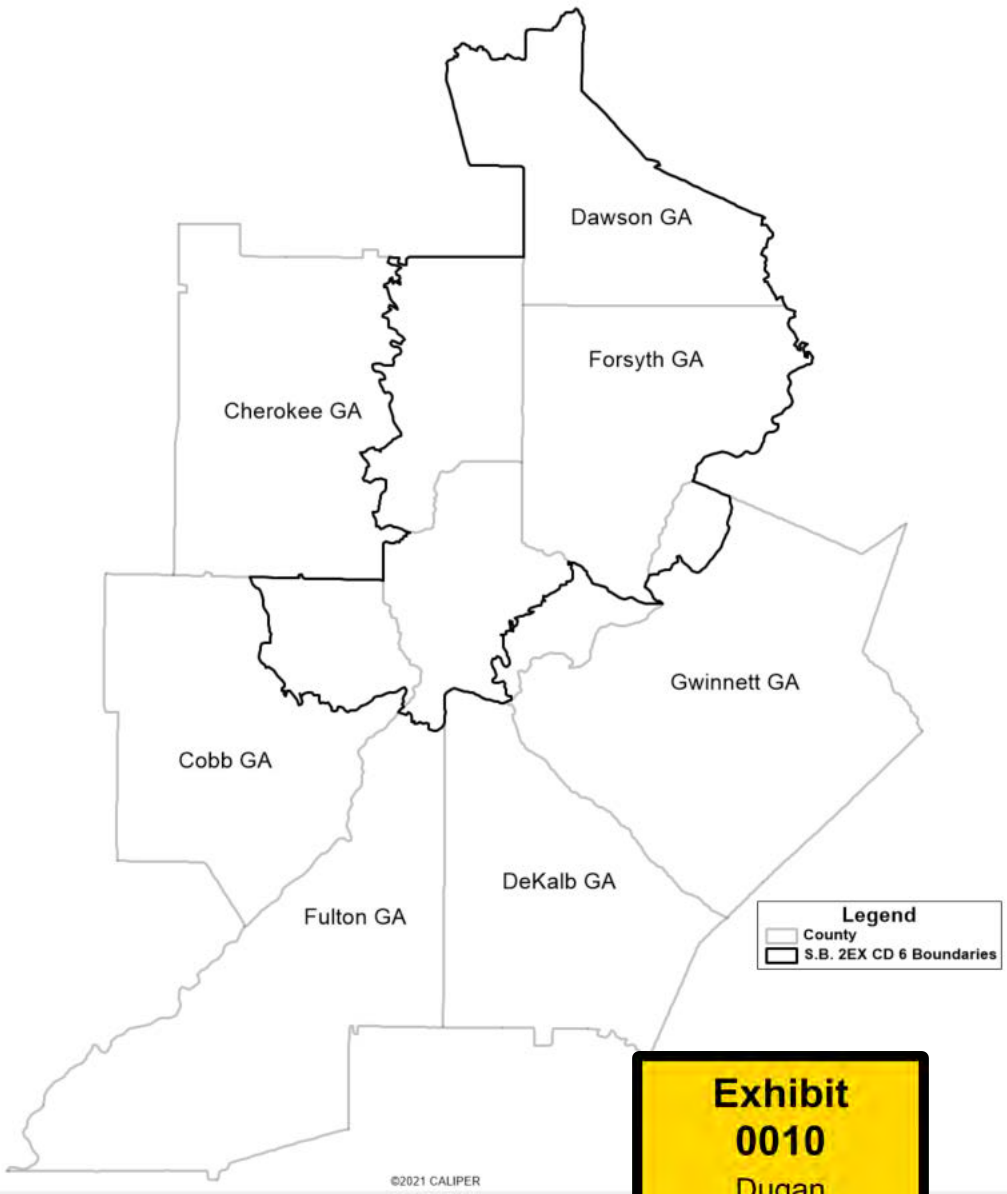
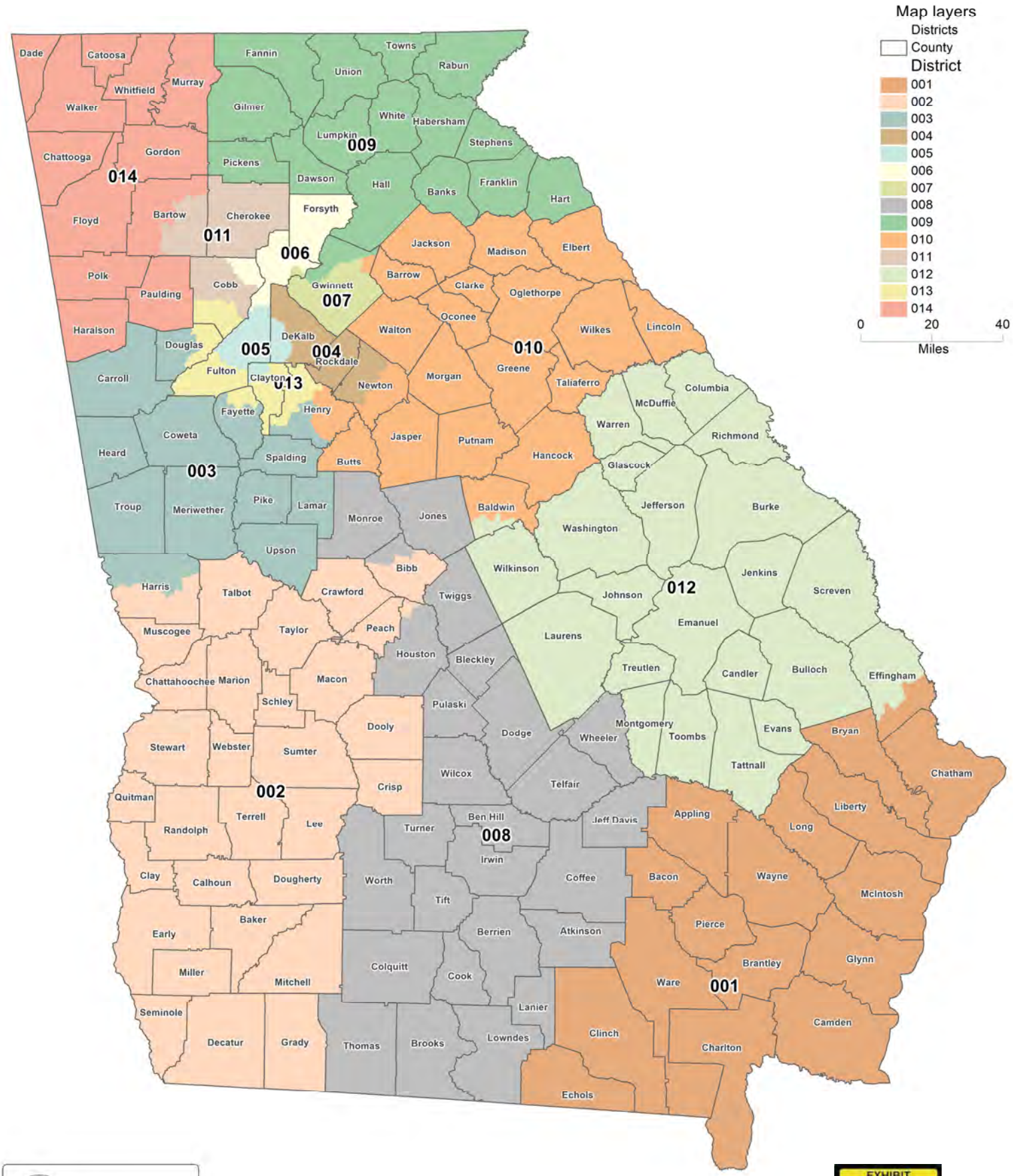


Exhibit
0010
Dugan

Draft- Georgia Congressional Districts

Client: S018
Plan: cong-s18-p1
Type: Congress



Legislative and Congressional Reapportionment Office
Georgia General Assembly
Suite 407 Coverdell Legislative Office Bldg

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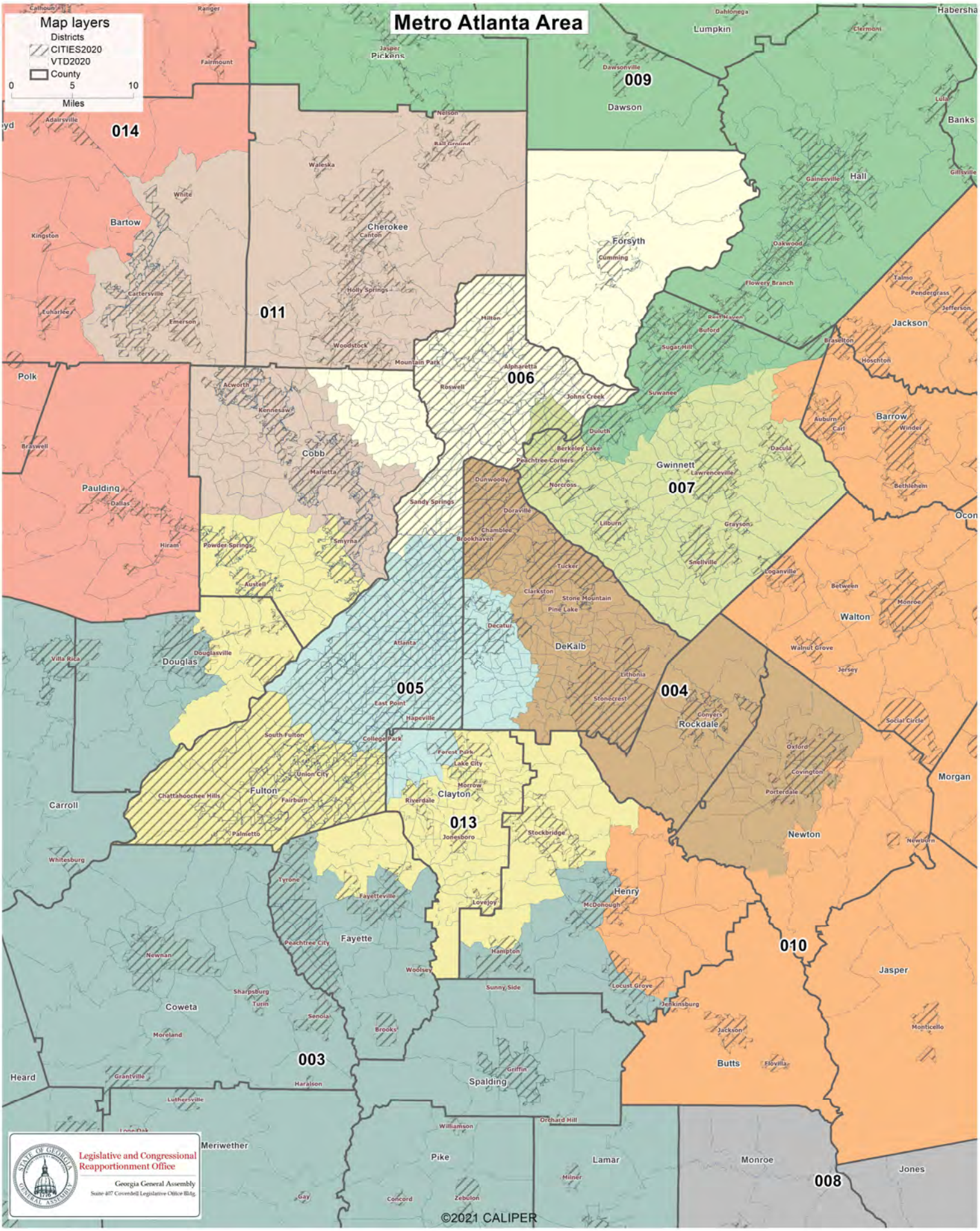
EXHIBIT
4

Draft- Georgia Congressional Districts

Client: S018
Plan: cong-s18-p1
Type: Congress



User: **S018**
Plan Name: **cong-s18-p1**
Plan Type: **Congress**

Population Summary

Tuesday, September 28, 2021 8:48 AM

Summary Statistics:

Population Range:	765,135 to 765,138
Ratio Range:	0.00
Absolute Range:	-1 to 2
Absolute Overall Range:	3
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.86
Relative Mean Deviation:	0.00%
Standard Deviation:	1.03

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blk]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	765,138	2	0.00%	589,477	77.04%	57.36%	27.69%	7.86%	2.19%	0.24%	0.16%	0.44%	4.07%
002	765,135	-1	0.00%	589,333	77.02%	41.68%	47.12%	5.9%	1.5%	0.2%	0.11%	0.35%	3.15%
003	765,135	-1	0.00%	583,333	76.24%	58.57%	27.89%	6.79%	2.1%	0.21%	0.04%	0.52%	3.89%
004	765,135	-1	0.00%	587,972	76.85%	25.85%	52.51%	11.52%	5.88%	0.16%	0.04%	0.64%	3.4%
005	765,137	1	0.00%	621,562	81.24%	32.66%	52.8%	6.5%	3.85%	0.16%	0.04%	0.53%	3.47%
006	765,136	0	0.00%	575,220	75.18%	60.96%	8.97%	10.26%	14.83%	0.14%	0.03%	0.69%	4.12%
007	765,135	-1	0.00%	567,113	74.12%	29.31%	29.42%	25.07%	11.87%	0.16%	0.04%	0.69%	3.43%
008	765,136	0	0.00%	583,009	76.2%	57.3%	30.05%	7.4%	1.52%	0.2%	0.04%	0.31%	3.18%
009	765,136	0	0.00%	595,476	77.83%	68.18%	7.45%	14.11%	6.06%	0.21%	0.03%	0.38%	3.58%
010	765,137	1	0.00%	591,955	77.37%	65.41%	20.66%	7.37%	2.33%	0.18%	0.03%	0.51%	3.51%
011	765,136	0	0.00%	594,934	77.76%	60.24%	16.93%	13.26%	3.96%	0.18%	0.04%	0.87%	4.53%
012	765,138	2	0.00%	586,770	76.69%	52.49%	35.68%	5.65%	1.83%	0.22%	0.11%	0.37%	3.65%
013	765,137	1	0.00%	574,626	75.1%	17.83%	61.68%	13.2%	3.24%	0.18%	0.04%	0.67%	3.15%
014	765,137	1	0.00%	579,494	75.74%	72.97%	9.58%	11.94%	1.02%	0.22%	0.04%	0.37%	3.85%

Total: **10,711,908**
Ideal District: **765,136**

User: **S018**
Plan Name: **cong-s18-p1**
Plan Type: **Congress**

Population Summary

Tuesday, September 28, 2021 8:49 AM

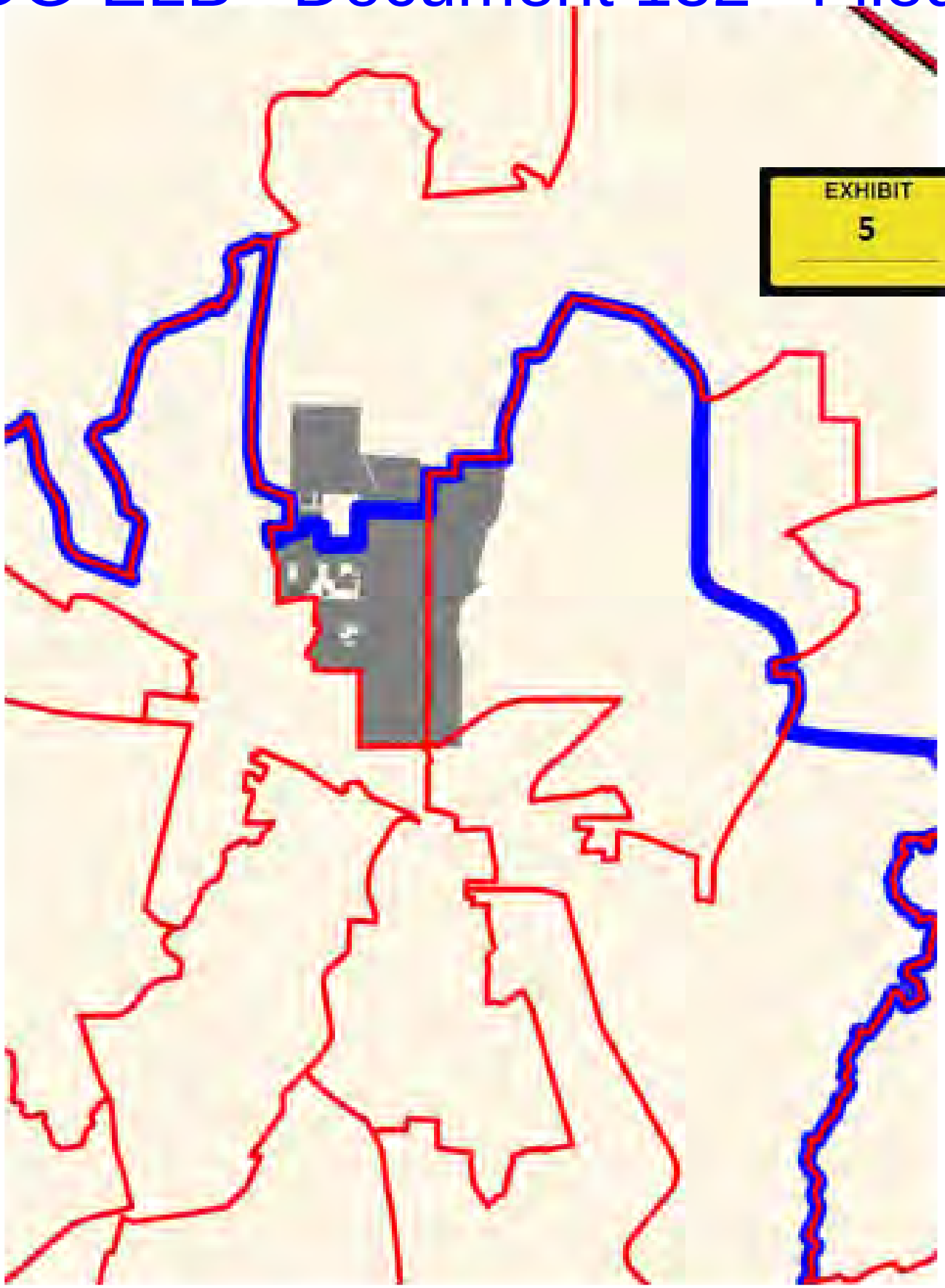
Summary Statistics:

Population Range:	765,135 to 765,138
Ratio Range:	0.00
Absolute Range:	-1 to 2
Absolute Overall Range:	3
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.86
Relative Mean Deviation:	0.00%
Standard Deviation:	1.03

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2 + Races]
001	765,138	2	0.00%	589,477	77.04%	60.22%	26.57%	6.86%	2.36%	0.26%	0.15%	0.37%	3.22%
002	765,135	-1	0.00%	589,333	77.02%	44.42%	45.77%	5.08%	1.56%	0.22%	0.1%	0.29%	2.57%
003	765,135	-1	0.00%	583,333	76.24%	61.37%	26.97%	5.78%	2.11%	0.22%	0.04%	0.42%	3.1%
004	765,135	-1	0.00%	587,972	76.85%	28.24%	52.19%	10.02%	5.82%	0.16%	0.04%	0.58%	2.96%
005	765,137	1	0.00%	621,562	81.24%	34.84%	51.18%	5.97%	4.27%	0.16%	0.04%	0.48%	3.05%
006	765,136	0	0.00%	575,220	75.18%	63.79%	9.11%	9.15%	13.82%	0.13%	0.04%	0.62%	3.35%
007	765,135	-1	0.00%	567,113	74.12%	32.6%	28.65%	22.49%	12.65%	0.16%	0.04%	0.59%	2.82%
008	765,136	0	0.00%	583,009	76.2%	59.93%	29.17%	6.3%	1.58%	0.21%	0.04%	0.24%	2.53%
009	765,136	0	0.00%	595,476	77.83%	71.64%	7.16%	11.67%	6%	0.22%	0.03%	0.31%	2.96%
010	765,137	1	0.00%	591,955	77.37%	67.84%	20.06%	6.22%	2.35%	0.19%	0.03%	0.44%	2.87%
011	765,136	0	0.00%	594,934	77.76%	62.95%	16.79%	11.46%	4.04%	0.18%	0.04%	0.79%	3.74%
012	765,138	2	0.00%	586,770	76.69%	55.01%	34.63%	4.89%	1.95%	0.22%	0.1%	0.3%	2.89%
013	765,137	1	0.00%	574,626	75.1%	20.54%	61.07%	11.35%	3.46%	0.19%	0.04%	0.61%	2.73%
014	765,137	1	0.00%	579,494	75.74%	75.96%	9.3%	9.92%	1.05%	0.24%	0.04%	0.29%	3.21%

Total: **10,711,908**
Ideal District: **765,136**

Oxford (Congress)



Prior Congressional District 14 Boundaries

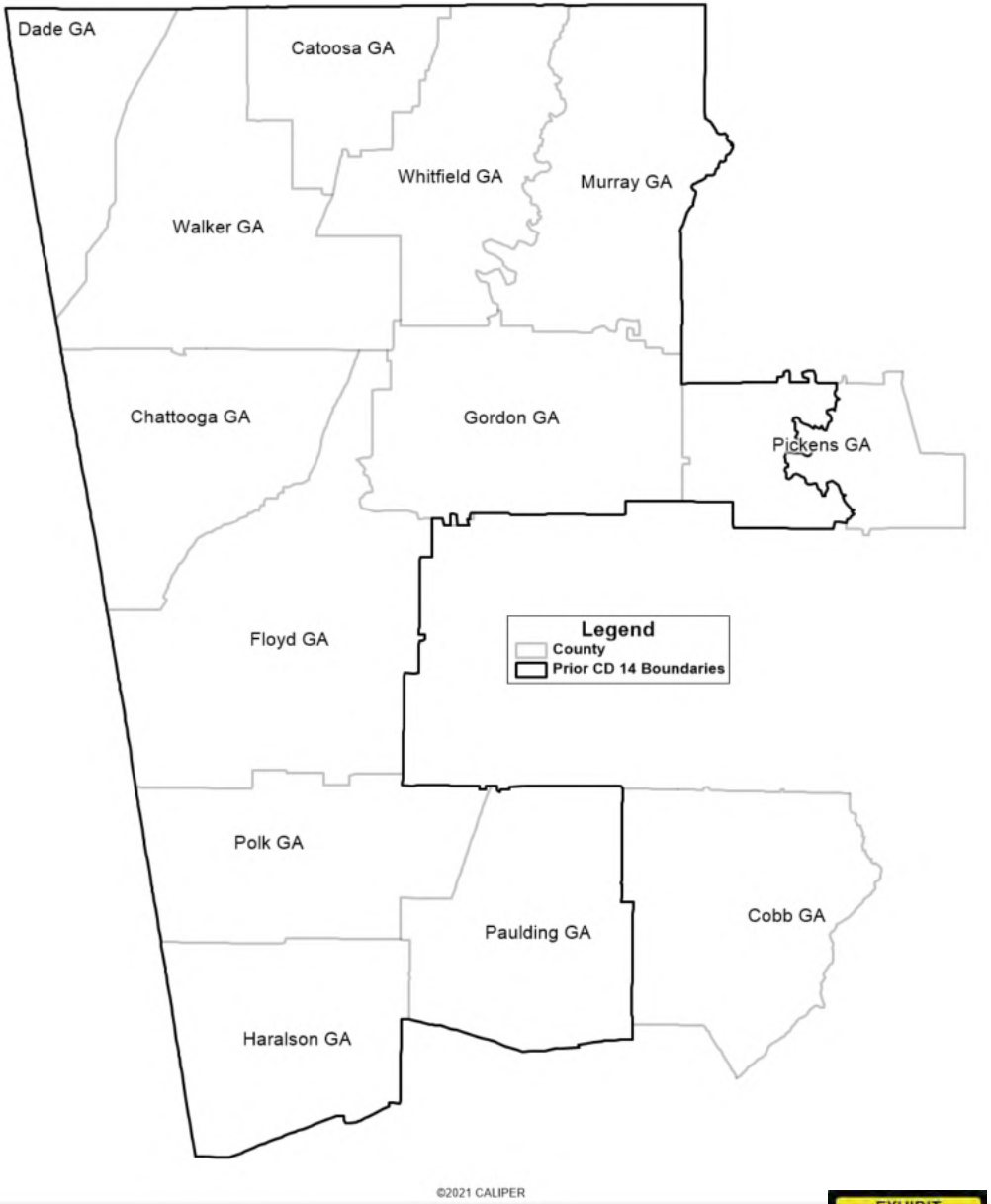


EXHIBIT
6

S.B. 2EX Congressional District 14 Boundaries

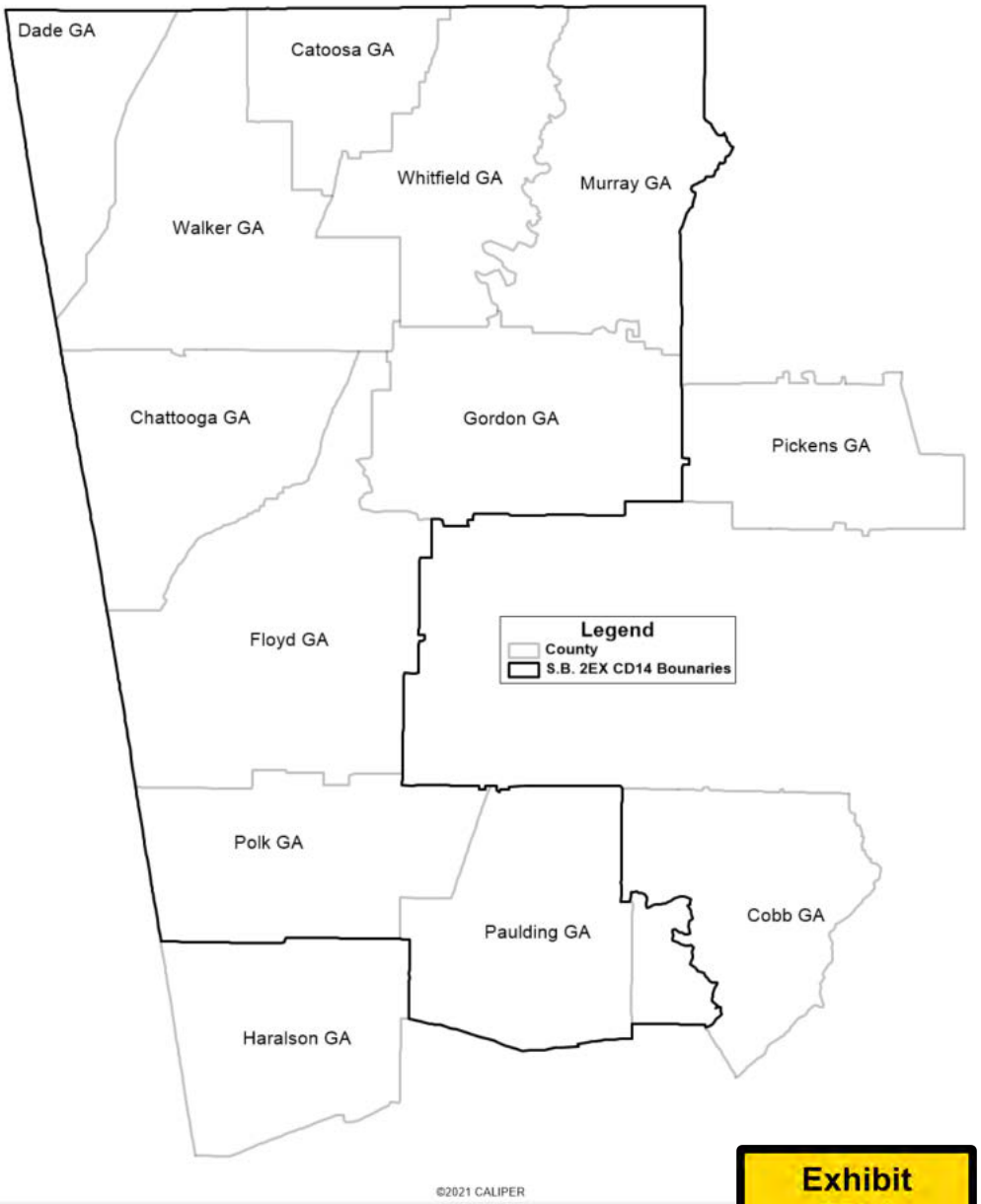


Exhibit
0014
Dugan

Prior Congressional District 13 Boundaries

S.B. 2EX Congressional District 13 Boundaries

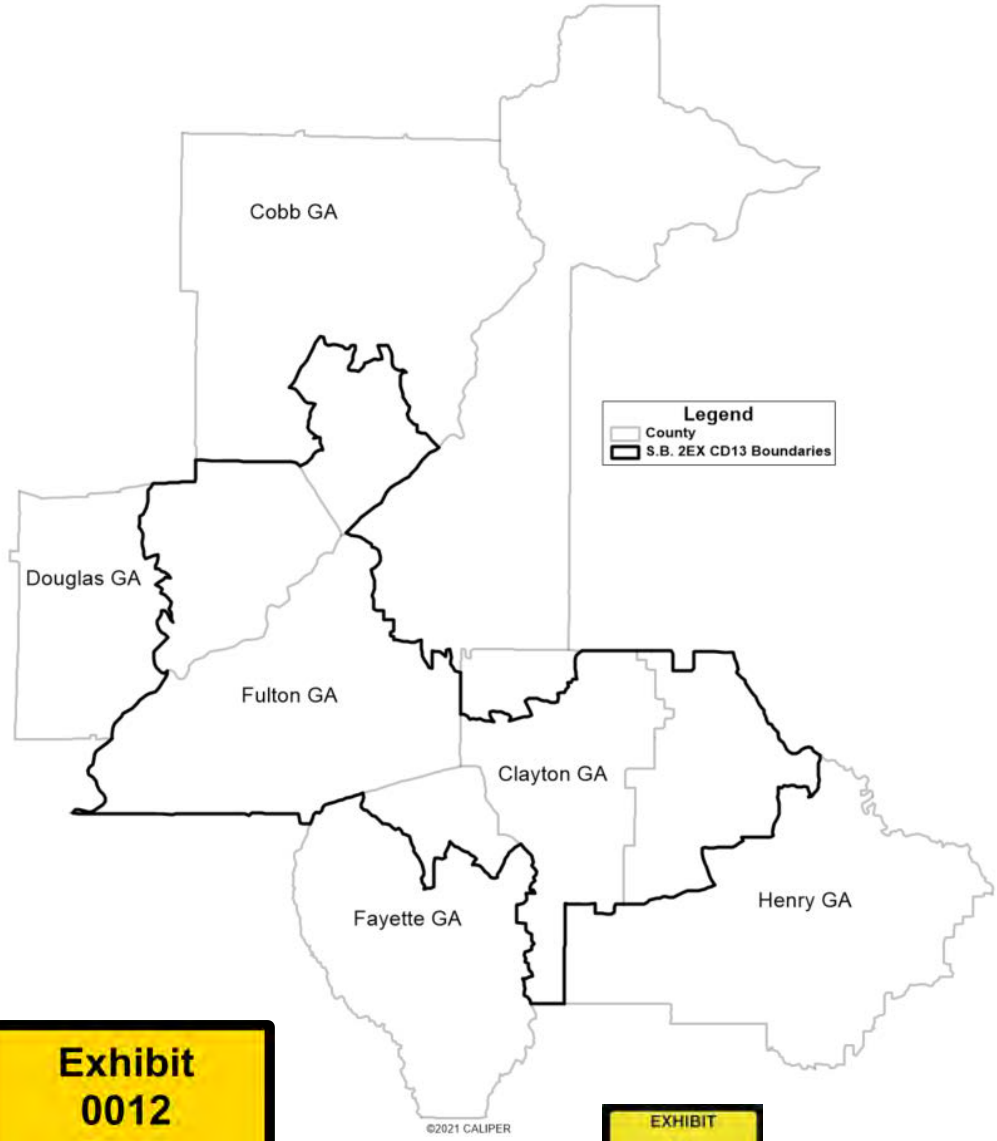


Exhibit
0012
Dugan

EXHIBIT
7

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

Georgia Senate Districts- 2022

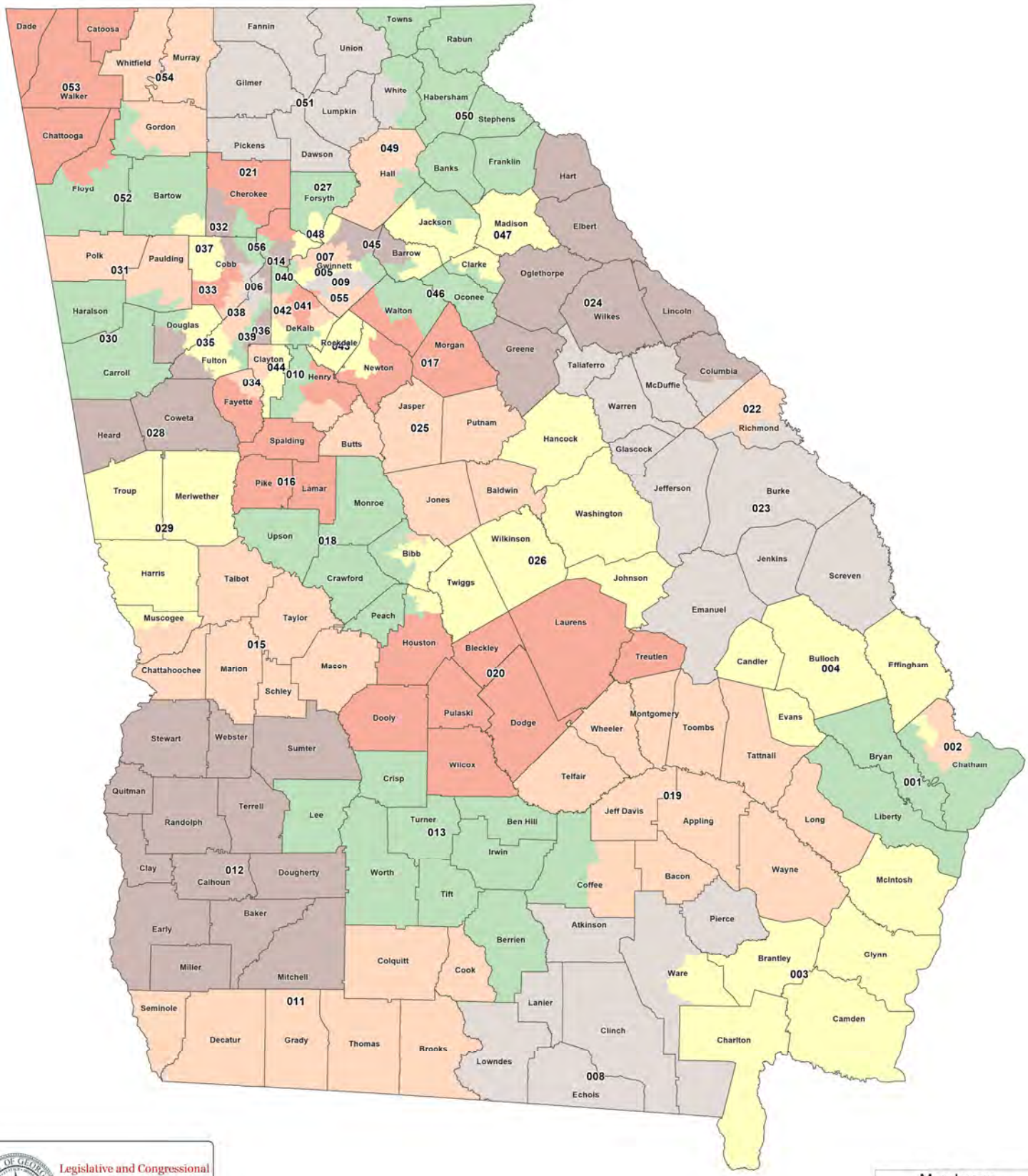


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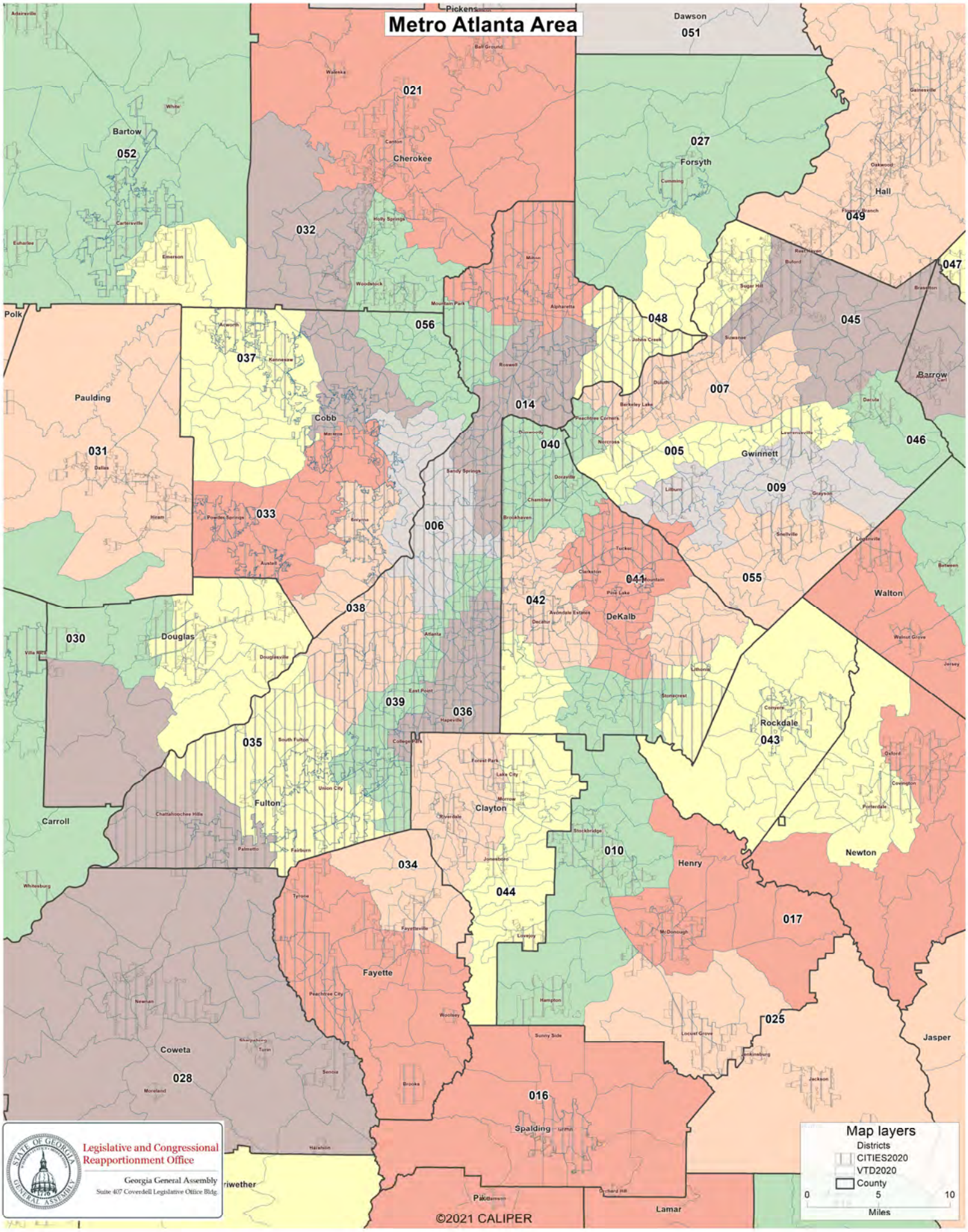
EXHIBIT
8

Map layers
Districts
County
0 20 40
Miles

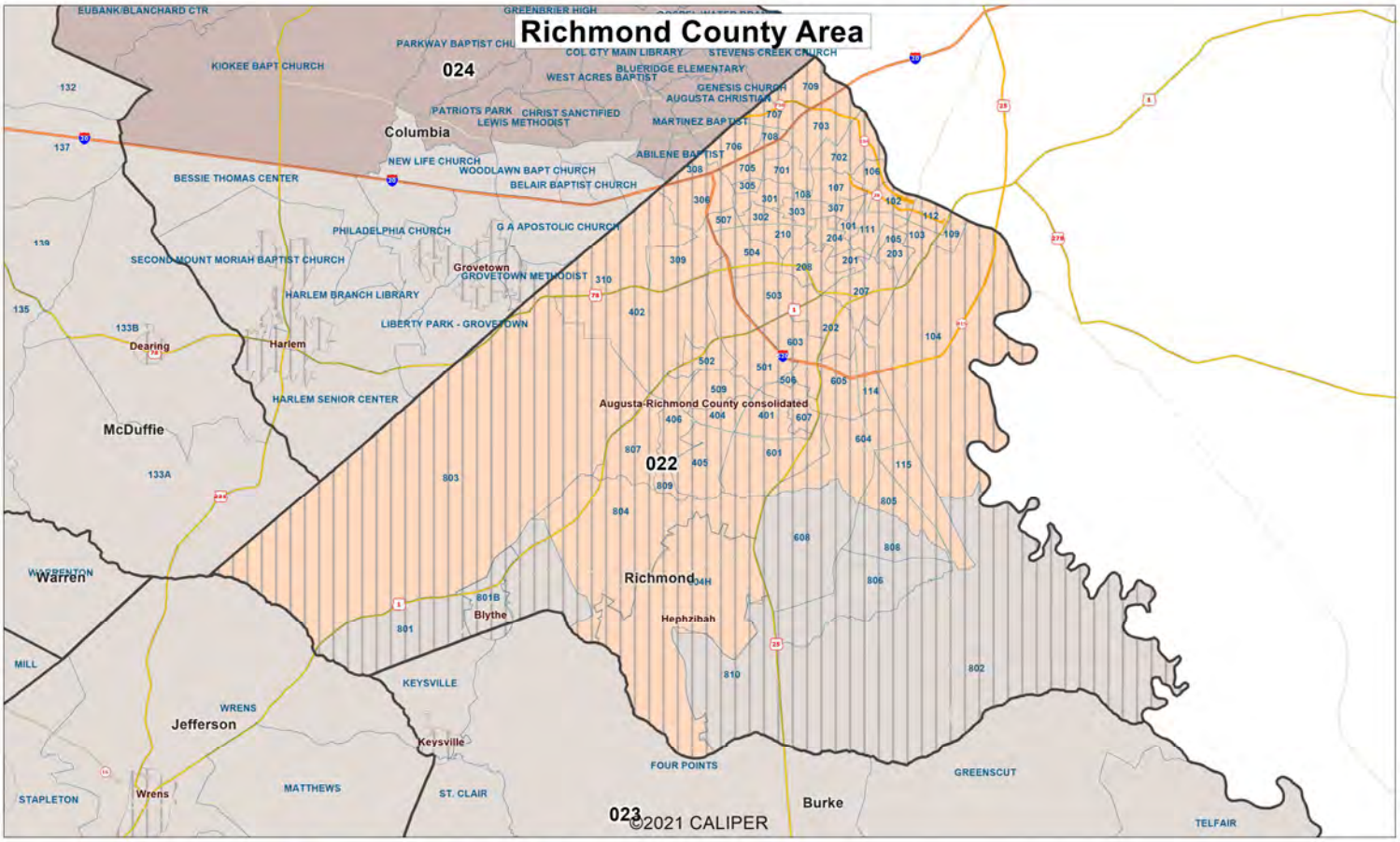
Georgia Senate Districts- 2022

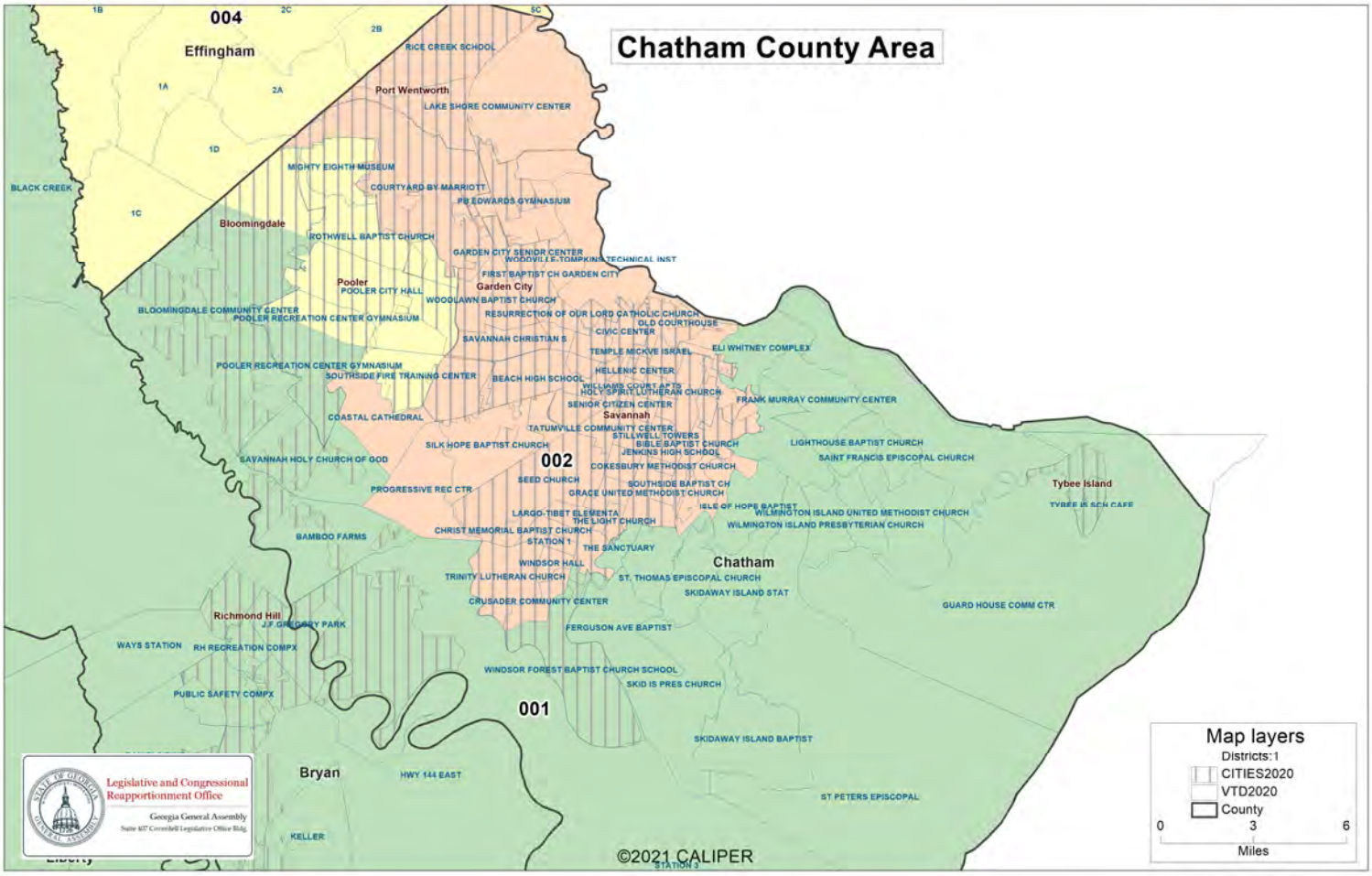
Client: State
Plan: Senate-prop1-2021
Type: Senate



Georgia Senate Districts- 2022

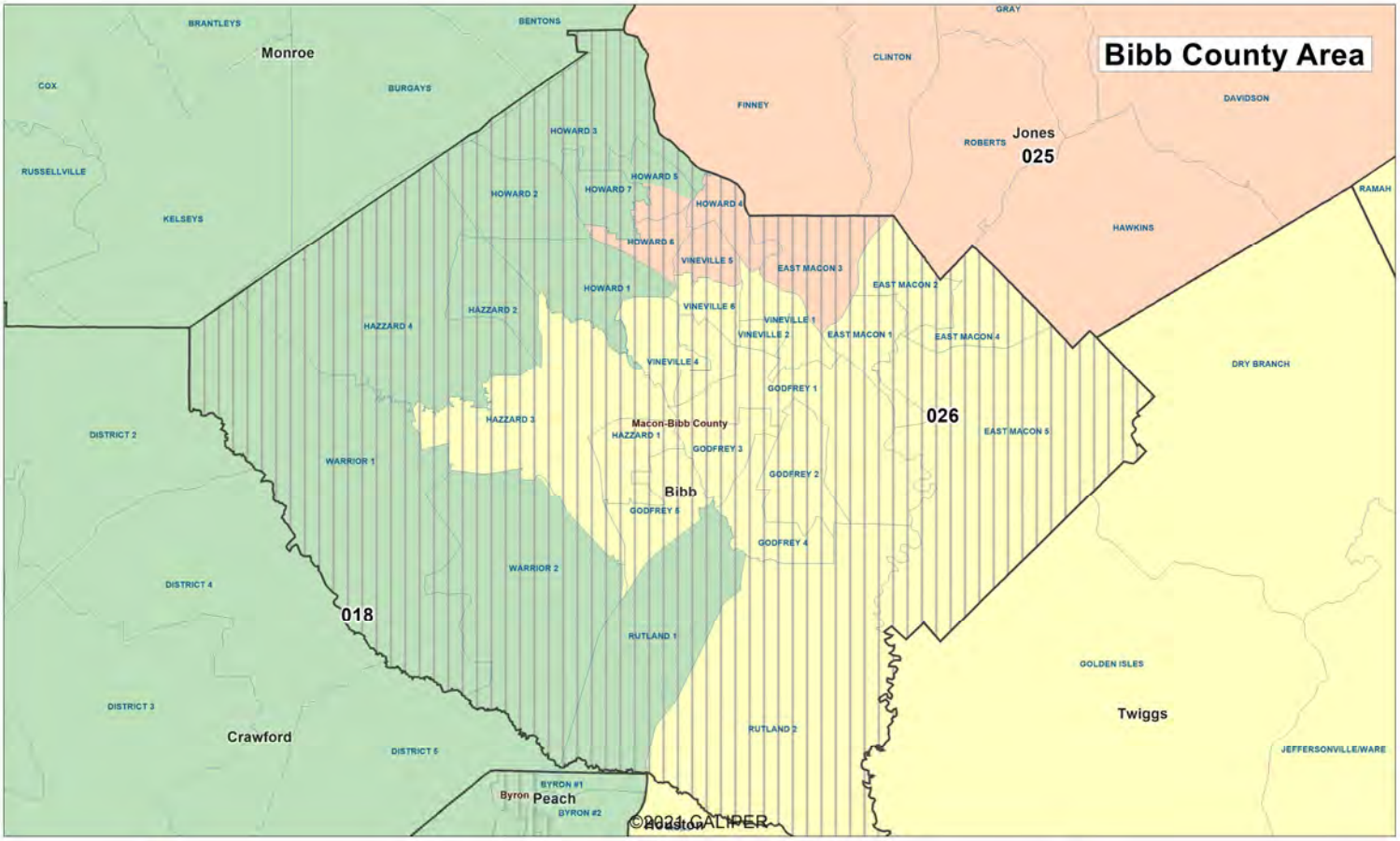
Client: State
Plan: Senate-prop1-2021
Type: Senate

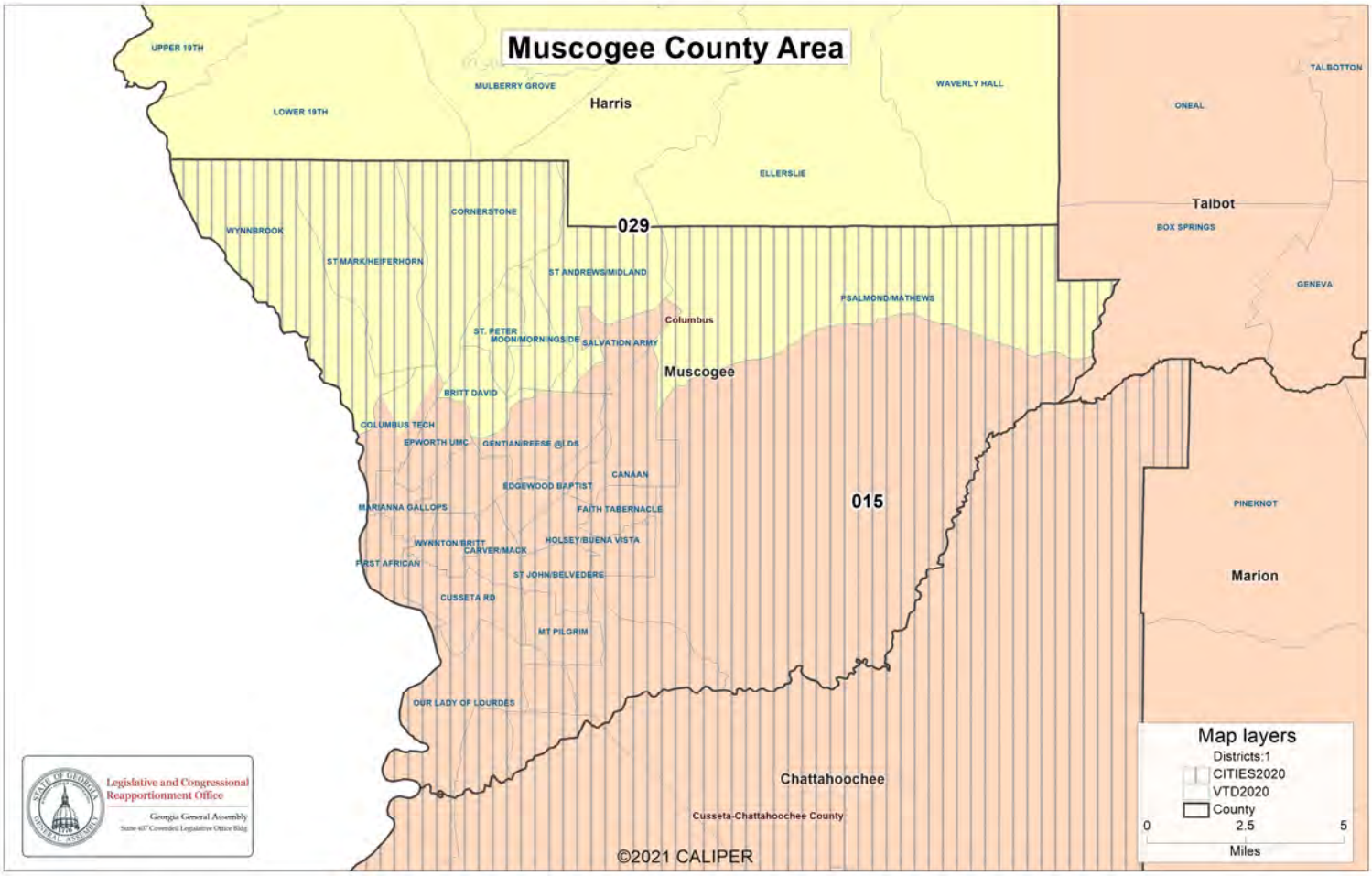




Georgia Senate Districts- 2022

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





User: State
Plan Name: Senate-prop1-2021
Plan Type: Senate

Population Summary

Summary Statistics:

Population Range:	189,320 to 193,163
Ratio Range:	0.02
Absolute Range:	-1,964 to 1,879
Absolute Overall Range:	3,843
Relative Range:	-1.03% to 0.98%
Relative Overall Range:	2.01%
Absolute Mean Deviation:	1,012.61
Relative Mean Deviation:	0.53%
Standard Deviation:	1,154.96

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blk]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	191,402	118	0.06%	145,428	75.98%	58.9%	23.66%	8.78%	2.64%	0.25%	0.3%	0.48%	4.99%
002	190,408	-876	-0.46%	150,843	79.22%	36.4%	47.51%	8.36%	3.4%	0.21%	0.15%	0.46%	3.49%
003	191,212	-72	-0.04%	148,915	77.88%	66.23%	20.92%	6.82%	1.22%	0.26%	0.09%	0.42%	4.04%
004	191,098	-186	-0.10%	146,443	76.63%	64.48%	22.6%	6.49%	1.86%	0.23%	0.07%	0.38%	3.9%
005	191,921	637	0.33%	139,394	72.63%	13.35%	26.84%	45.47%	10.98%	0.15%	0.04%	0.64%	2.52%
006	191,401	117	0.06%	155,781	81.39%	56.41%	21.47%	9.18%	7.21%	0.16%	0.03%	1.11%	4.42%
007	189,709	-1,575	-0.82%	147,425	77.71%	35.09%	20.08%	18.57%	21.67%	0.16%	0.04%	0.66%	3.72%
008	192,396	1,112	0.58%	145,144	75.44%	57.39%	30.03%	7.28%	1.21%	0.28%	0.07%	0.35%	3.4%
009	192,915	1,631	0.85%	142,054	73.64%	32.04%	28.46%	21.09%	13.98%	0.18%	0.03%	0.72%	3.48%
010	192,898	1,614	0.84%	147,884	76.66%	17.71%	68.95%	6.03%	3.1%	0.18%	0.03%	0.66%	3.34%
011	189,976	-1,308	-0.68%	144,597	76.11%	55.75%	31.13%	9.36%	0.69%	0.23%	0.03%	0.26%	2.54%
012	190,819	-465	-0.24%	149,154	78.17%	33.83%	58.82%	3.89%	0.86%	0.16%	0.02%	0.21%	2.2%
013	189,326	-1,958	-1.02%	144,141	76.13%	61.25%	27.08%	7.2%	1.2%	0.17%	0.02%	0.26%	2.81%
014	192,533	1,249	0.65%	155,340	80.68%	54.63%	16.79%	13.97%	9.46%	0.13%	0.04%	0.79%	4.19%
015	189,446	-1,838	-0.96%	144,506	76.28%	34.07%	52.31%	7.57%	1.31%	0.23%	0.27%	0.44%	3.79%
016	191,829	545	0.28%	147,133	76.7%	64.19%	22.31%	5.95%	3.04%	0.17%	0.03%	0.51%	3.79%
017	192,510	1,226	0.64%	144,472	75.05%	56.69%	31.21%	6.08%	1.41%	0.16%	0.05%	0.59%	3.81%
018	191,825	541	0.28%	150,196	78.3%	58.41%	30.01%	5.18%	2.42%	0.22%	0.03%	0.4%	3.33%
019	192,316	1,032	0.54%	146,131	75.98%	61.67%	24.76%	9.72%	0.58%	0.17%	0.06%	0.27%	2.77%
020	192,588	1,304	0.68%	147,033	76.35%	59.74%	30.65%	4.21%	1.73%	0.15%	0.05%	0.31%	3.16%
021	192,572	1,288	0.67%	145,120	75.36%	71.13%	6.52%	10.13%	7.38%	0.19%	0.04%	0.53%	4.08%
022	193,163	1,879	0.98%	150,450	77.89%	31.1%	56.58%	5.63%	1.97%	0.24%	0.18%	0.44%	3.86%
023	190,344	-940	-0.49%	144,113	75.71%	54.27%	34.66%	5.46%	1.16%	0.24%	0.1%	0.34%	3.78%
024	192,674	1,390	0.73%	148,602	77.13%	67.45%	18.98%	5.4%	3.31%	0.18%	0.09%	0.43%	4.15%
025	191,161	-123	-0.06%	148,917	77.9%	57.45%	33.4%	4.27%	1.08%	0.16%	0.05%	0.43%	3.16%
026	189,945	-1,339	-0.70%	145,744	76.73%	33.26%	57.37%	4.85%	0.83%	0.21%	0.04%	0.31%	3.14%
027	190,676	-608	-0.32%	139,196	73%	68%	4.31%	11.61%	11.41%	0.18%	0.04%	0.52%	3.94%
028	190,422	-862	-0.45%	144,973	76.13%	67.06%	18.79%	7.4%	1.96%	0.22%	0.04%	0.48%	4.06%
029	189,424	-1,860	-0.97%	145,674	76.9%	60.71%	26.22%	5.34%	3.02%	0.23%	0.1%	0.42%	3.97%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blk]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
030	191,475	191	0.10%	145,077	75.77%	66.97%	19.83%	7.27%	0.95%	0.23%	0.03%	0.49%	4.24%
031	192,560	1,276	0.67%	142,251	73.87%	65.2%	19.83%	8.85%	1.07%	0.23%	0.06%	0.58%	4.19%
032	192,448	1,164	0.61%	149,879	77.88%	63.13%	13.22%	12.09%	5.49%	0.2%	0.04%	0.91%	4.91%
033	192,694	1,410	0.74%	146,415	75.98%	26%	40.48%	26.72%	2.13%	0.19%	0.05%	0.86%	3.56%
034	190,668	-616	-0.32%	141,840	74.39%	11.11%	66.6%	14.82%	3.9%	0.23%	0.04%	0.6%	2.7%
035	192,839	1,555	0.81%	144,675	75.02%	16.46%	69.77%	8.68%	1.13%	0.17%	0.06%	0.64%	3.08%
036	192,282	998	0.52%	161,385	83.93%	33.1%	51.35%	7.56%	3.58%	0.17%	0.04%	0.53%	3.68%
037	192,671	1,387	0.73%	147,779	76.7%	62.38%	18.04%	9.99%	3.85%	0.16%	0.03%	0.78%	4.76%
038	193,155	1,871	0.98%	148,367	76.81%	20.03%	62.74%	9.72%	3.42%	0.18%	0.04%	0.58%	3.29%
039	191,500	216	0.11%	156,022	81.47%	25.32%	60.33%	6.1%	4.25%	0.16%	0.04%	0.57%	3.22%
040	190,544	-740	-0.39%	147,000	77.15%	43.69%	16.42%	24.81%	10.84%	0.12%	0.04%	0.65%	3.43%
041	191,023	-261	-0.14%	145,278	76.05%	18.86%	60.28%	7.32%	9.19%	0.22%	0.02%	0.64%	3.48%
042	190,940	-344	-0.18%	153,952	80.63%	49.91%	28.14%	10.13%	6.81%	0.13%	0.03%	0.61%	4.24%
043	192,729	1,445	0.76%	145,741	75.62%	23.45%	62.77%	8.13%	1.24%	0.17%	0.09%	0.67%	3.49%
044	190,036	-1,248	-0.65%	145,224	76.42%	13.02%	69.13%	9.96%	4.15%	0.16%	0.04%	0.62%	2.91%
045	190,692	-592	-0.31%	140,706	73.79%	52.74%	17.12%	14.66%	10.69%	0.13%	0.03%	0.62%	4.01%
046	190,312	-972	-0.51%	146,713	77.09%	67.24%	16.64%	7.99%	3.77%	0.2%	0.03%	0.58%	3.56%
047	190,607	-677	-0.35%	146,599	76.91%	64.67%	16.96%	11.22%	2.66%	0.16%	0.04%	0.58%	3.71%
048	190,123	-1,161	-0.61%	136,995	72.06%	49.01%	8.35%	7.58%	30.59%	0.13%	0.04%	0.55%	3.75%
049	189,355	-1,929	-1.01%	144,123	76.11%	60.85%	7.13%	26.24%	2.15%	0.15%	0.04%	0.35%	3.08%
050	189,320	-1,964	-1.03%	148,799	78.6%	78.61%	5.05%	11.08%	1.22%	0.22%	0.04%	0.26%	3.52%
051	190,167	-1,117	-0.58%	155,571	81.81%	88.75%	0.84%	5.43%	0.59%	0.31%	0.02%	0.3%	3.77%
052	190,799	-485	-0.25%	146,620	76.85%	71.8%	12.39%	10.11%	1.08%	0.21%	0.03%	0.35%	4.02%
053	190,236	-1,048	-0.55%	148,201	77.9%	85.78%	4.46%	3.98%	1%	0.24%	0.06%	0.3%	4.18%
054	192,443	1,159	0.61%	143,843	74.75%	65.71%	2.97%	26.66%	1.14%	0.19%	0.02%	0.25%	3.07%
055	190,155	-1,129	-0.59%	141,968	74.66%	18.09%	62.96%	10.14%	4.19%	0.17%	0.04%	0.73%	3.67%
056	191,226	-58	-0.03%	144,448	75.54%	73.9%	6.36%	8.63%	5.67%	0.11%	0.03%	0.75%	4.56%

Total: **10,711,908**
Ideal District: **191,284**

User: State
Plan Name: Senate-prop1-2021
Plan Type: Senate

Population Summary

Summary Statistics:

Population Range:	189,320 to 193,163
Ratio Range:	0.02
Absolute Range:	-1,964 to 1,879
Absolute Overall Range:	3,843
Relative Range:	-1.03% to 0.98%
Relative Overall Range:	2.01%
Absolute Mean Deviation:	1,012.61
Relative Mean Deviation:	0.53%
Standard Deviation:	1,154.96

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	191,402	118	0.06%	145,428	75.98%	61.99%	22.8%	7.55%	2.81%	0.28%	0.27%	0.4%	3.9%
002	190,408	-876	-0.46%	150,843	79.22%	40.21%	44.81%	7.48%	3.77%	0.22%	0.15%	0.42%	2.95%
003	191,212	-72	-0.04%	148,915	77.88%	68.88%	19.81%	6.17%	1.27%	0.27%	0.08%	0.34%	3.19%
004	191,098	-186	-0.10%	146,443	76.63%	66.78%	21.98%	5.52%	1.9%	0.24%	0.07%	0.33%	3.17%
005	191,921	637	0.33%	139,394	72.63%	15.69%	27.21%	41.67%	12.41%	0.14%	0.04%	0.55%	2.28%
006	191,401	117	0.06%	155,781	81.39%	57.79%	21.79%	8.24%	7.14%	0.16%	0.03%	1.05%	3.8%
007	189,709	-1,575	-0.82%	147,425	77.71%	37.84%	19.33%	16.56%	22.58%	0.16%	0.05%	0.55%	2.93%
008	192,396	1,112	0.58%	145,144	75.44%	60.1%	29.02%	6.21%	1.27%	0.29%	0.08%	0.27%	2.75%
009	192,915	1,631	0.85%	142,054	73.64%	35.81%	27.23%	18.77%	14.59%	0.18%	0.04%	0.59%	2.8%
010	192,898	1,614	0.84%	147,884	76.66%	19.64%	68.31%	5.18%	3.15%	0.18%	0.04%	0.61%	2.89%
011	189,976	-1,308	-0.68%	144,597	76.11%	58.97%	30.08%	7.6%	0.72%	0.26%	0.02%	0.22%	2.13%
012	190,819	-465	-0.24%	149,154	78.17%	36.71%	56.63%	3.48%	0.92%	0.18%	0.02%	0.18%	1.88%
013	189,326	-1,958	-1.02%	144,141	76.13%	64.1%	26.01%	6.01%	1.21%	0.17%	0.02%	0.21%	2.26%
014	192,533	1,249	0.65%	155,340	80.68%	57.1%	16.83%	12.13%	9.43%	0.12%	0.05%	0.74%	3.61%
015	189,446	-1,838	-0.96%	144,506	76.28%	36.52%	51.56%	6.59%	1.45%	0.23%	0.25%	0.36%	3.04%
016	191,829	545	0.28%	147,133	76.7%	66.91%	21.49%	5.03%	2.92%	0.18%	0.03%	0.42%	3.01%
017	192,510	1,226	0.64%	144,472	75.05%	59.42%	30.21%	5.13%	1.41%	0.17%	0.03%	0.49%	3.14%
018	191,825	541	0.28%	150,196	78.3%	60.69%	29.2%	4.51%	2.46%	0.22%	0.03%	0.29%	2.6%
019	192,316	1,032	0.54%	146,131	75.98%	63.99%	24.52%	8.38%	0.62%	0.18%	0.06%	0.2%	2.06%
020	192,588	1,304	0.68%	147,033	76.35%	61.71%	30.17%	3.49%	1.76%	0.16%	0.05%	0.25%	2.41%
021	192,572	1,288	0.67%	145,120	75.36%	73.87%	6.37%	8.77%	6.98%	0.18%	0.04%	0.48%	3.32%
022	193,163	1,879	0.98%	150,450	77.89%	34.38%	53.94%	5.35%	2.3%	0.24%	0.18%	0.38%	3.24%
023	190,344	-940	-0.49%	144,113	75.71%	56.89%	33.91%	4.52%	1.24%	0.25%	0.09%	0.27%	2.84%
024	192,674	1,390	0.73%	148,602	77.13%	69.81%	18.69%	4.4%	3.27%	0.2%	0.07%	0.35%	3.2%
025	191,161	-123	-0.06%	148,917	77.9%	59.94%	32.23%	3.66%	1.09%	0.18%	0.04%	0.39%	2.48%
026	189,945	-1,339	-0.70%	145,744	76.73%	36.6%	55.18%	4.24%	0.92%	0.22%	0.03%	0.24%	2.56%
027	190,676	-608	-0.32%	139,196	73%	71.5%	4.16%	10.2%	10.27%	0.15%	0.04%	0.45%	3.22%
028	190,422	-862	-0.45%	144,973	76.13%	69.44%	18.18%	6.44%	1.99%	0.23%	0.04%	0.38%	3.29%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
029	189,424	-1,860	-0.97%	145,674	76.9%	63.22%	25.52%	4.45%	3%	0.23%	0.11%	0.33%	3.13%
030	191,475	191	0.10%	145,077	75.77%	69.41%	19.44%	6.1%	0.97%	0.24%	0.03%	0.41%	3.4%
031	192,560	1,276	0.67%	142,251	73.87%	68.26%	19.13%	7.42%	1.12%	0.22%	0.06%	0.46%	3.33%
032	192,448	1,164	0.61%	149,879	77.88%	65.78%	13.13%	10.55%	5.42%	0.2%	0.04%	0.83%	4.05%
033	192,694	1,410	0.74%	146,415	75.98%	30.25%	40.26%	22.93%	2.35%	0.22%	0.05%	0.81%	3.14%
034	190,668	-616	-0.32%	141,840	74.39%	13.36%	66.5%	12.75%	4.26%	0.22%	0.04%	0.56%	2.31%
035	192,839	1,555	0.81%	144,675	75.02%	18.82%	68.87%	7.51%	1.26%	0.18%	0.06%	0.59%	2.7%
036	192,282	998	0.52%	161,385	83.93%	36.18%	48.68%	7.06%	4.01%	0.17%	0.04%	0.51%	3.34%
037	192,671	1,387	0.73%	147,779	76.7%	65.37%	17.41%	8.69%	3.94%	0.17%	0.04%	0.67%	3.73%
038	193,155	1,871	0.98%	148,367	76.81%	21.87%	62.45%	8.44%	3.55%	0.18%	0.04%	0.56%	2.92%
039	191,500	216	0.11%	156,022	81.47%	27.87%	57.97%	5.65%	4.83%	0.15%	0.04%	0.5%	2.98%
040	190,544	-740	-0.39%	147,000	77.15%	46.34%	17.32%	21.62%	11.15%	0.11%	0.04%	0.59%	2.84%
041	191,023	-261	-0.14%	145,278	76.05%	21.39%	59.67%	6.68%	8.42%	0.22%	0.02%	0.6%	3.01%
042	190,940	-344	-0.18%	153,952	80.63%	51.39%	28.73%	8.64%	7.16%	0.12%	0.03%	0.53%	3.4%
043	192,729	1,445	0.76%	145,741	75.62%	26.53%	61.35%	6.89%	1.34%	0.17%	0.08%	0.6%	3.05%
044	190,036	-1,248	-0.65%	145,224	76.42%	15.29%	68.39%	8.6%	4.37%	0.17%	0.04%	0.56%	2.58%
045	190,692	-592	-0.31%	140,706	73.79%	55.47%	16.86%	13.05%	10.89%	0.13%	0.03%	0.5%	3.07%
046	190,312	-972	-0.51%	146,713	77.09%	69.9%	15.64%	6.99%	3.85%	0.22%	0.02%	0.5%	2.89%
047	190,607	-677	-0.35%	146,599	76.91%	67.46%	16.34%	9.57%	2.79%	0.17%	0.04%	0.5%	3.13%
048	190,123	-1,161	-0.61%	136,995	72.06%	52.25%	8.26%	7%	29.05%	0.11%	0.04%	0.47%	2.83%
049	189,355	-1,929	-1.01%	144,123	76.11%	65.64%	7.12%	21.9%	2.22%	0.16%	0.04%	0.29%	2.63%
050	189,320	-1,964	-1.03%	148,799	78.6%	81.54%	5.03%	8.78%	1.24%	0.24%	0.03%	0.24%	2.91%
051	190,167	-1,117	-0.58%	155,571	81.81%	90.24%	0.84%	4.34%	0.61%	0.33%	0.02%	0.27%	3.34%
052	190,799	-485	-0.25%	146,620	76.85%	74.74%	12.08%	8.24%	1.13%	0.22%	0.02%	0.29%	3.27%
053	190,236	-1,048	-0.55%	148,201	77.9%	87.31%	4.49%	3.23%	0.99%	0.26%	0.06%	0.22%	3.44%
054	192,443	1,159	0.61%	143,843	74.75%	69.98%	3.07%	22.64%	1.15%	0.22%	0.02%	0.21%	2.71%
055	190,155	-1,129	-0.59%	141,968	74.66%	20.56%	62.42%	8.71%	4.24%	0.18%	0.04%	0.67%	3.18%
056	191,226	-58	-0.03%	144,448	75.54%	76.17%	6.37%	7.66%	5.51%	0.12%	0.03%	0.63%	3.51%

Total: **10,711,908**

Ideal District: **191,284**

SD 17

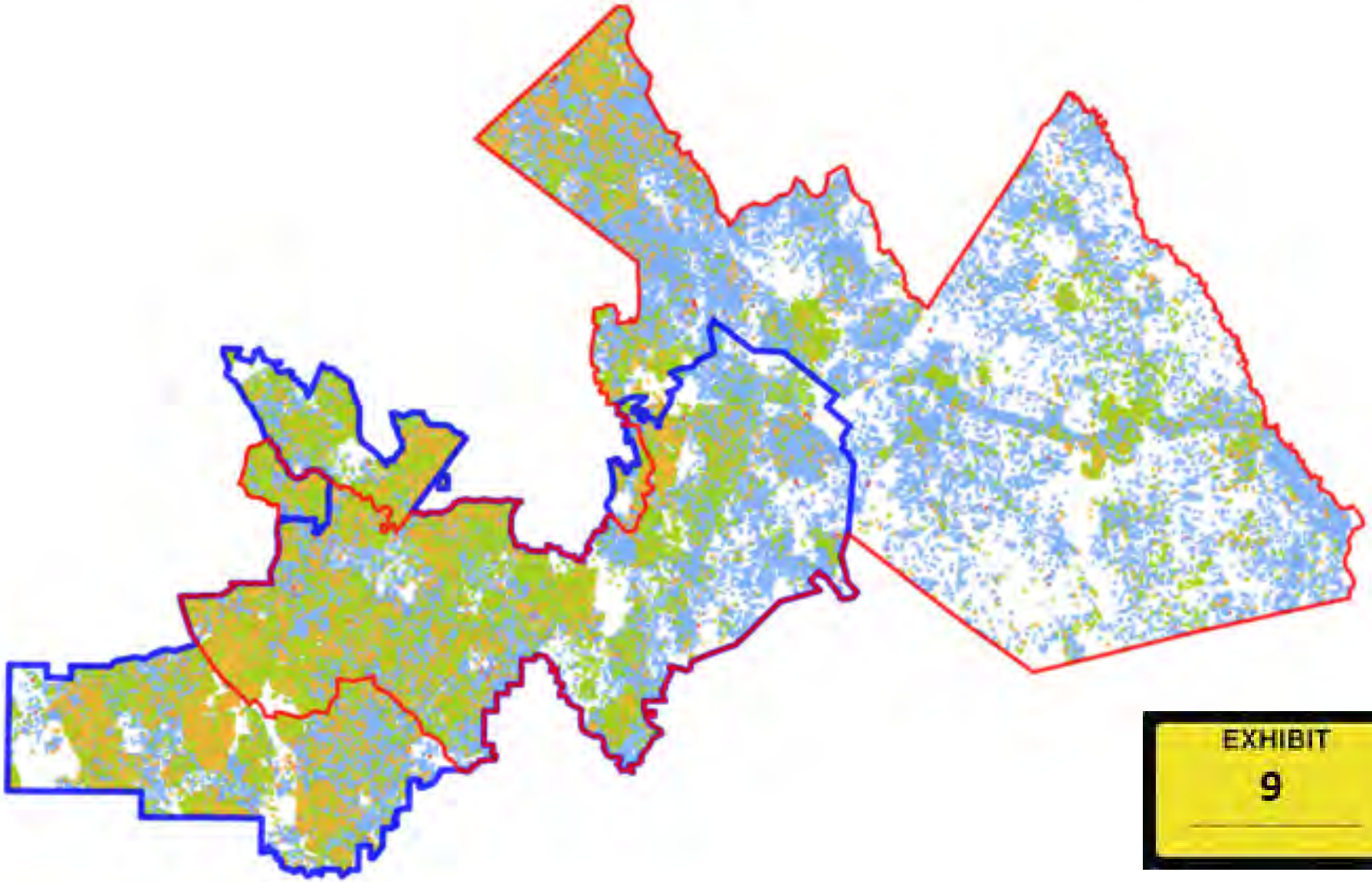


EXHIBIT
9

Asian White Black Latino = 1 person

SD 48

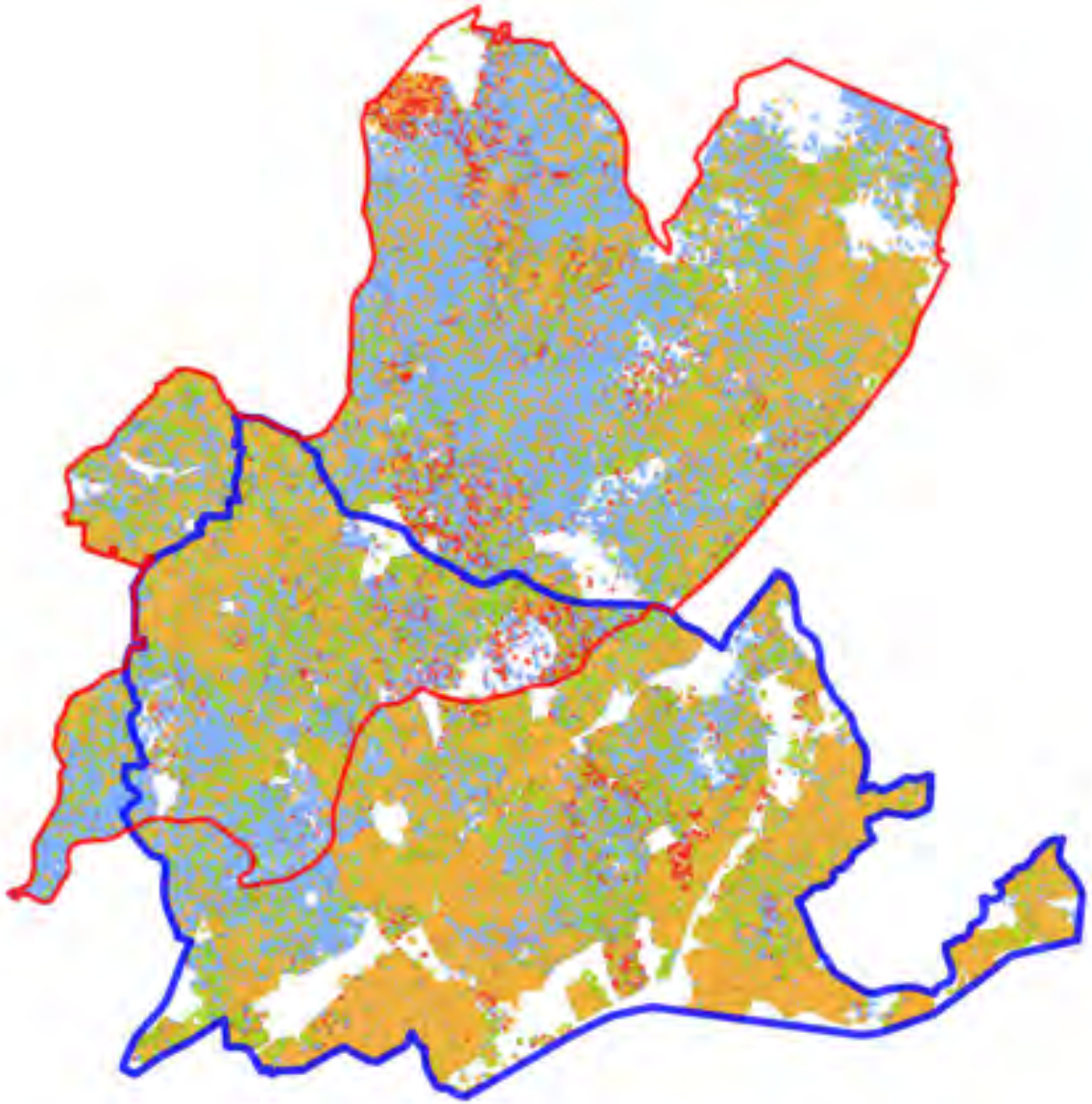
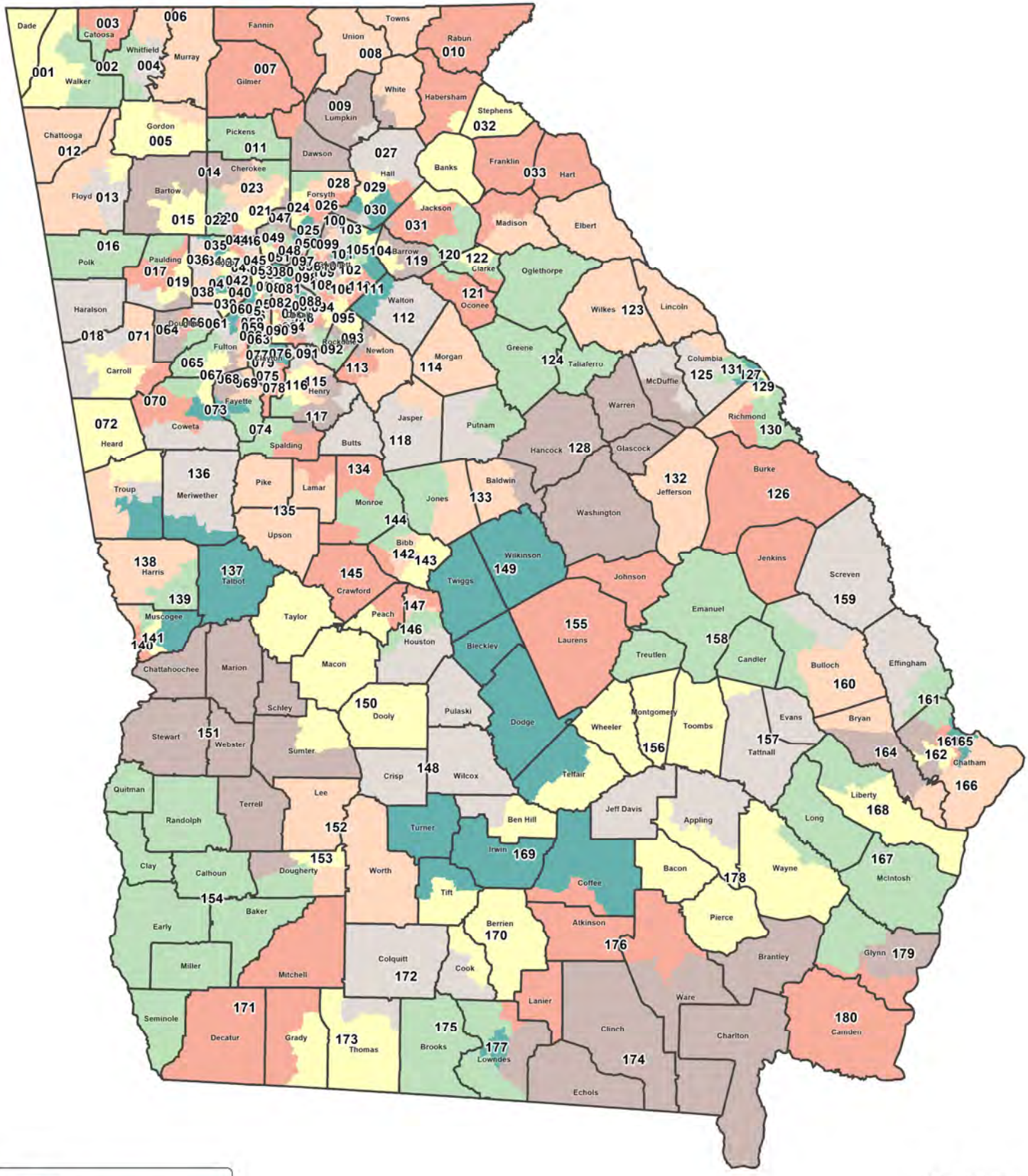


EXHIBIT
10

Asian White Black Latino = 1 person

Georgia House Districts- 2022

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



Legislative and Congressional Reapportionment Office
Georgia General Assembly
Suite 407 Coverdell Legislative Office Bldg

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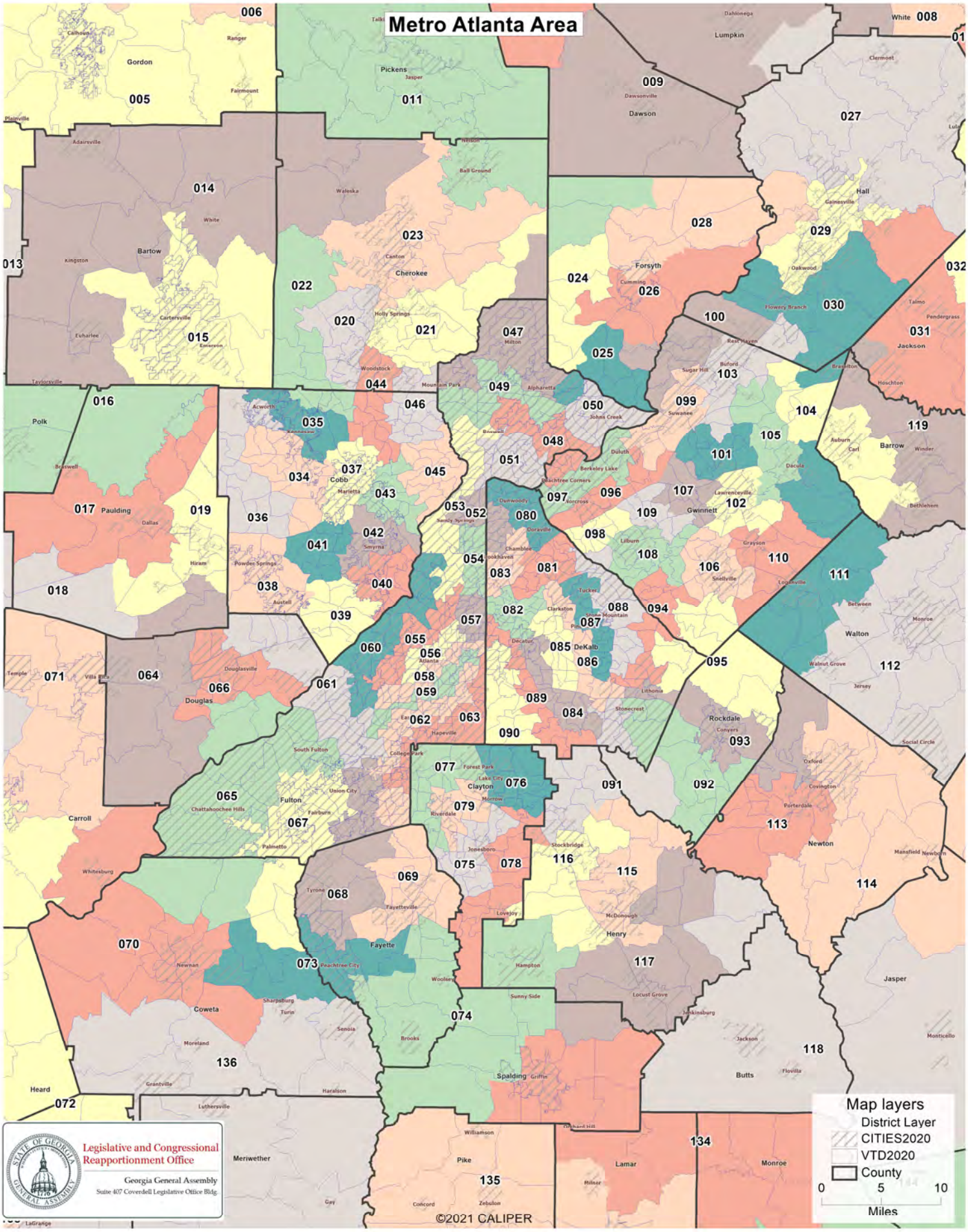
EXHIBIT
11

Map layers
District Layer
County
0 20 40
Miles

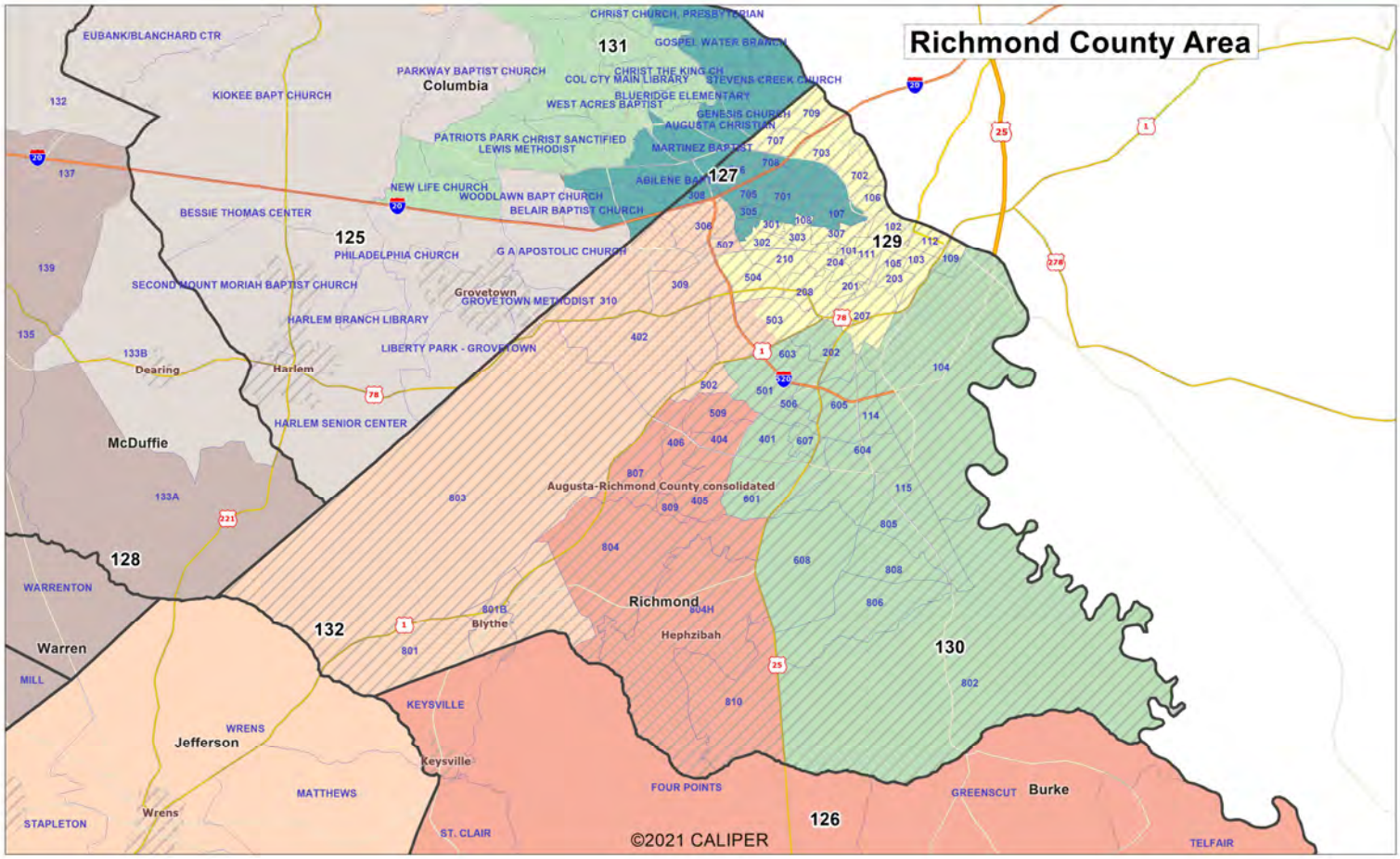
Georgia House Districts- 2022

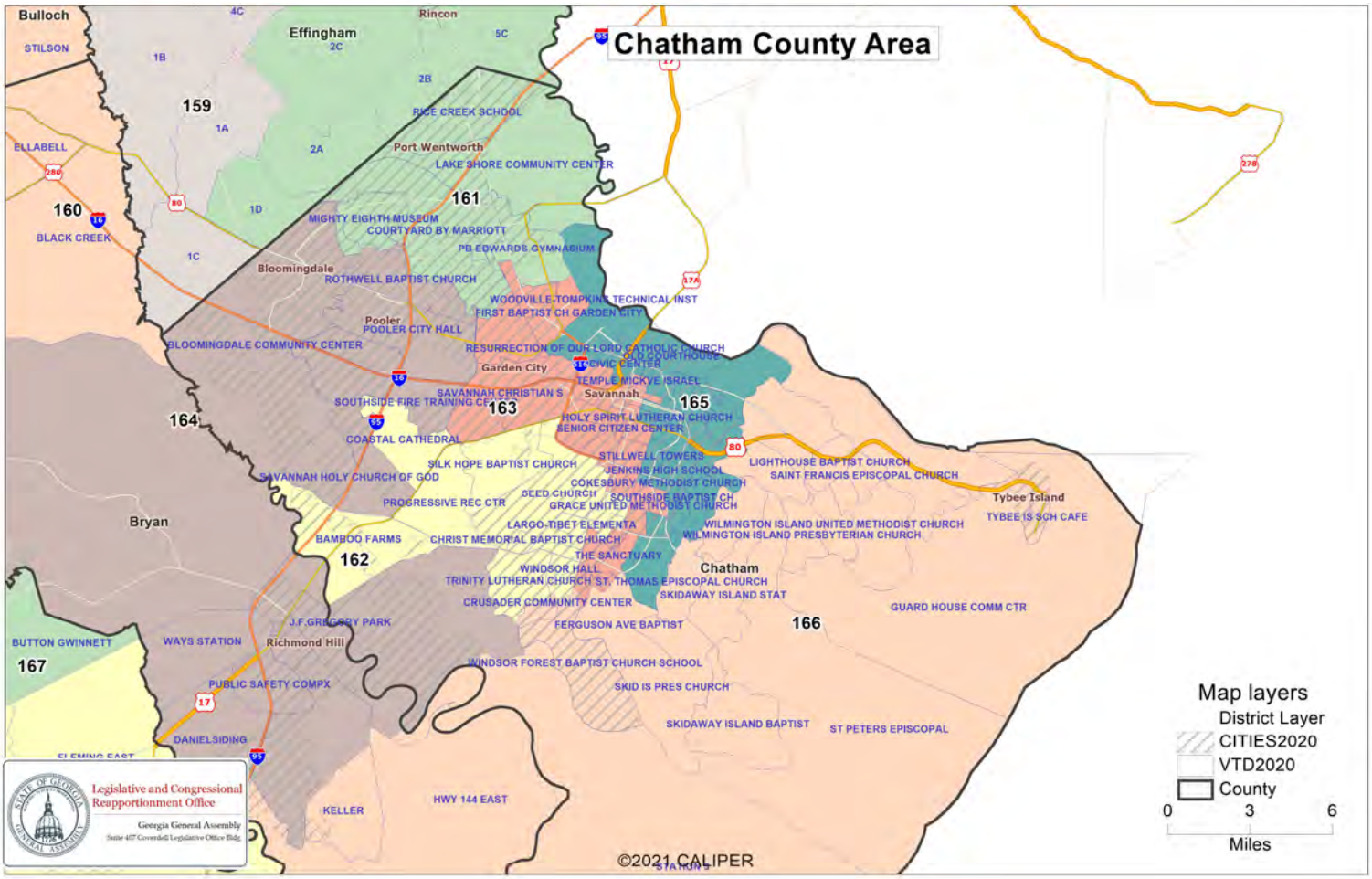
Client: State
Plan: House-prop1-2021
Type: House



Georgia House Districts- 2022

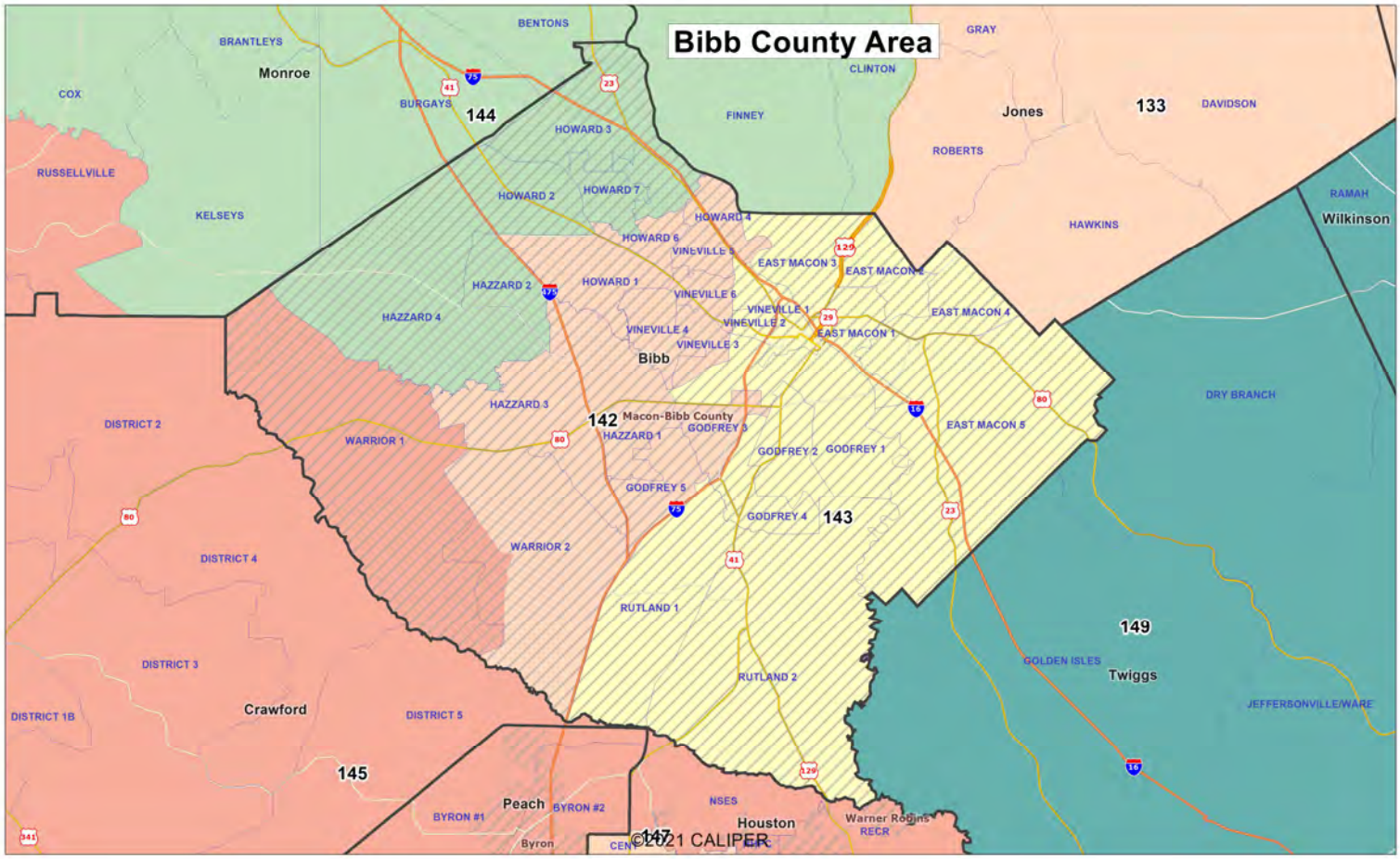
Client: State
Plan: House-prop1-2021
Type: House

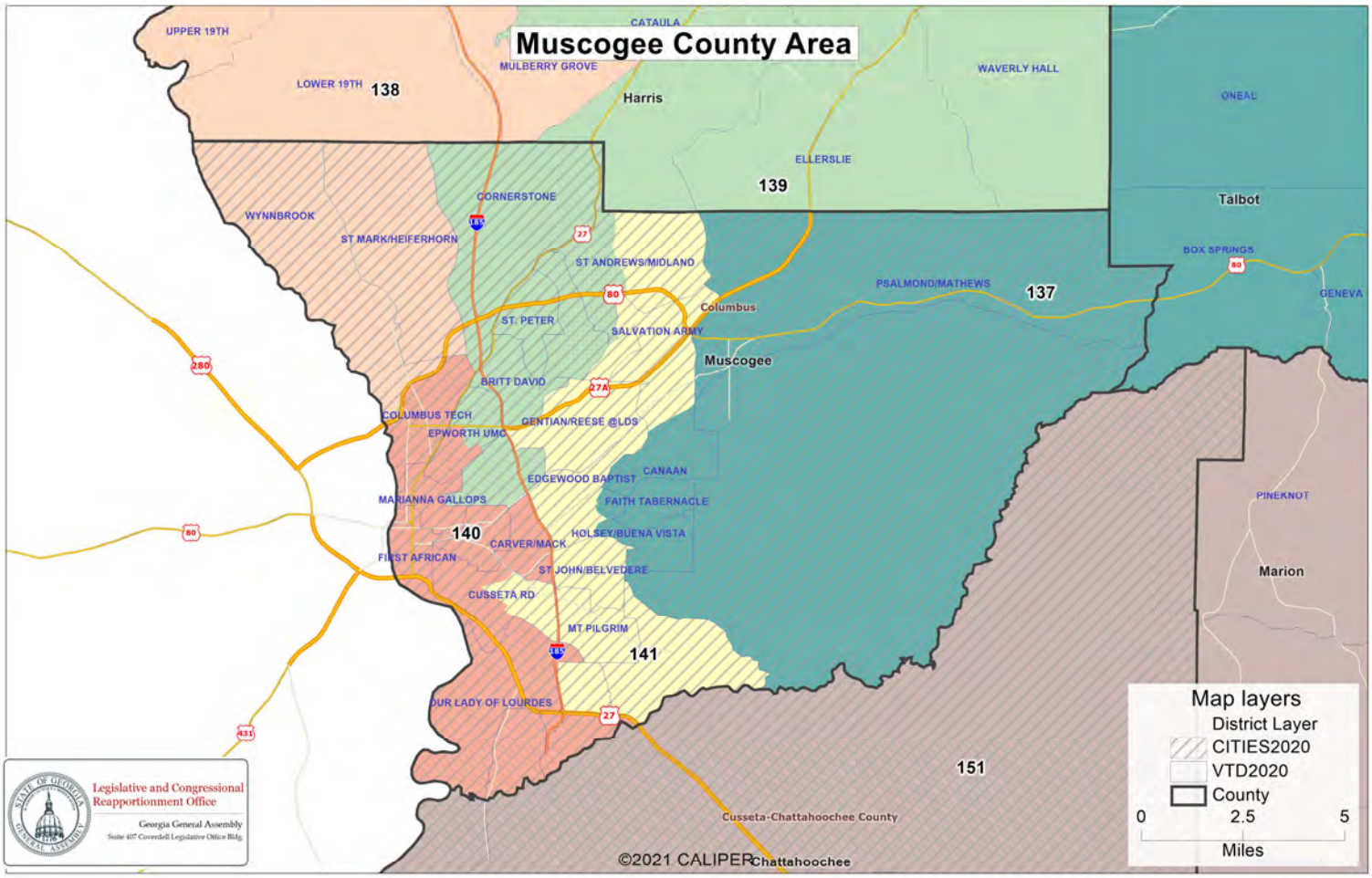




Georgia House Districts- 2022

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





User: **State**
Plan Name: **House-prop1-2021**
Plan Type: **House**

Population Summary

Summary Statistics:

Population Range:	58,678 to 60,308
Ratio Range:	0.03
Absolute Range:	-833 to 797
Absolute Overall Range:	1,630
Relative Range:	-1.40% to 1.34%
Relative Overall Range:	2.74%
Absolute Mean Deviation:	363.71
Relative Mean Deviation:	0.61%
Standard Deviation:	417.67

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blk]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	59,666	155	0.26%	46,801	78.44%	87.88%	3.9%	2.59%	0.53%	0.31%	0.04%	0.3%	4.45%
002	59,773	262	0.44%	46,159	77.22%	83.24%	2.56%	9.09%	1.1%	0.18%	0.02%	0.26%	3.55%
003	60,199	688	1.16%	46,716	77.6%	86.9%	2.82%	3.6%	1.63%	0.27%	0.14%	0.18%	4.46%
004	59,070	-441	-0.74%	42,798	72.45%	42.01%	4.17%	50.07%	1.23%	0.17%	0.02%	0.28%	2.05%
005	58,837	-674	-1.13%	44,623	75.84%	75.46%	3.76%	15.29%	1.24%	0.2%	0.02%	0.22%	3.81%
006	59,712	201	0.34%	45,152	75.62%	80.15%	1.01%	14.51%	0.51%	0.2%	0.01%	0.2%	3.4%
007	59,081	-430	-0.72%	48,771	82.55%	87.97%	0.37%	7.43%	0.45%	0.26%	0.01%	0.24%	3.27%
008	59,244	-267	-0.45%	49,612	83.74%	90.8%	1.13%	3.21%	0.54%	0.3%	0.01%	0.34%	3.67%
009	59,474	-37	-0.06%	48,273	81.17%	87.78%	1.01%	5.49%	0.79%	0.37%	0.06%	0.36%	4.15%
010	59,519	8	0.01%	47,164	79.24%	78.61%	2.97%	13.11%	1.51%	0.17%	0.06%	0.24%	3.33%
011	58,792	-719	-1.21%	45,396	77.21%	87.43%	1.55%	5.33%	1.15%	0.22%	0.02%	0.3%	4%
012	59,300	-211	-0.35%	46,487	78.39%	78.45%	8.61%	7.68%	1.01%	0.16%	0.01%	0.42%	3.68%
013	59,150	-361	-0.61%	45,176	76.38%	62.24%	18.71%	13.52%	1.29%	0.22%	0.03%	0.33%	3.65%
014	59,135	-376	-0.63%	45,511	76.96%	81.38%	5.86%	7.04%	0.77%	0.21%	0.03%	0.34%	4.36%
015	59,213	-298	-0.50%	45,791	77.33%	68.38%	13.61%	11.74%	1.3%	0.25%	0.04%	0.49%	4.19%
016	59,402	-109	-0.18%	44,009	74.09%	72.9%	11.15%	10.95%	0.76%	0.22%	0.05%	0.43%	3.54%
017	59,120	-391	-0.66%	42,761	72.33%	63.28%	22.06%	7.9%	1.33%	0.23%	0.07%	0.64%	4.49%
018	59,335	-176	-0.30%	45,159	76.11%	84.78%	7.11%	2.93%	0.59%	0.23%	0.04%	0.35%	3.97%
019	58,955	-556	-0.93%	44,299	75.14%	62.06%	23.47%	7.87%	1.14%	0.25%	0.08%	0.64%	4.49%
020	60,107	596	1.00%	45,725	76.07%	73.93%	8.13%	10.6%	1.97%	0.16%	0.04%	0.63%	4.54%
021	59,529	18	0.03%	44,931	75.48%	80.04%	4.29%	8.54%	1.84%	0.19%	0.04%	0.66%	4.4%
022	59,460	-51	-0.09%	45,815	77.05%	62.53%	13.94%	13.26%	3.86%	0.2%	0.03%	0.81%	5.37%
023	59,048	-463	-0.78%	44,254	74.95%	71.47%	5.64%	17.19%	1.06%	0.22%	0.04%	0.36%	4.01%
024	59,011	-500	-0.84%	41,814	70.86%	60.13%	6%	11.36%	17.65%	0.21%	0.04%	0.62%	3.98%
025	59,414	-97	-0.16%	42,520	71.57%	51.99%	5%	5.42%	33.55%	0.15%	0.03%	0.51%	3.36%
026	59,248	-263	-0.44%	44,081	74.4%	63.48%	3.29%	12.07%	16.8%	0.18%	0.04%	0.5%	3.64%
027	58,795	-716	-1.20%	46,004	78.24%	79.69%	3.22%	11.82%	0.82%	0.19%	0.04%	0.3%	3.91%
028	58,972	-539	-0.91%	44,444	75.36%	76.5%	3.39%	13.59%	2.06%	0.16%	0.03%	0.4%	3.86%
029	59,200	-311	-0.52%	43,131	72.86%	36.05%	12.13%	46.28%	2.72%	0.12%	0.06%	0.41%	2.23%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blk]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
030	59,266	-245	-0.41%	45,414	76.63%	67.03%	7.37%	18.78%	3.04%	0.15%	0.03%	0.34%	3.26%
031	59,901	390	0.66%	43,120	71.99%	65.57%	6.64%	21.63%	2.27%	0.19%	0.02%	0.37%	3.31%
032	59,145	-366	-0.62%	45,942	77.68%	80.8%	7.24%	6.03%	1.26%	0.29%	0.05%	0.25%	4.09%
033	59,187	-324	-0.54%	46,498	78.56%	79.94%	10.97%	4.08%	1.2%	0.15%	0.01%	0.36%	3.29%
034	59,875	364	0.61%	45,758	76.42%	66.59%	14.46%	9.06%	4.41%	0.11%	0.04%	0.68%	4.65%
035	59,889	378	0.64%	48,312	80.67%	50.12%	26.55%	12.7%	4.43%	0.21%	0.04%	0.9%	5.04%
036	59,994	483	0.81%	44,911	74.86%	68.01%	16.01%	7.46%	3.07%	0.14%	0.03%	0.73%	4.55%
037	59,176	-335	-0.56%	46,223	78.11%	42.2%	26%	21.96%	4.5%	0.21%	0.03%	1%	4.11%
038	59,317	-194	-0.33%	44,839	75.59%	25.93%	52.72%	14.72%	1.77%	0.22%	0.07%	0.7%	3.88%
039	59,381	-130	-0.22%	44,436	74.83%	20.6%	52.08%	21.79%	1.5%	0.14%	0.03%	0.65%	3.2%
040	59,044	-467	-0.78%	47,976	81.25%	48.94%	30.78%	6.43%	8.54%	0.17%	0.02%	0.7%	4.43%
041	60,122	611	1.03%	45,271	75.3%	23.42%	36.44%	33.22%	2.81%	0.18%	0.05%	0.86%	3.02%
042	59,620	109	0.18%	48,525	81.39%	35.47%	31.18%	20.49%	7.11%	0.19%	0.03%	1.15%	4.37%
043	59,464	-47	-0.08%	47,033	79.09%	43.32%	24.35%	15.85%	7.83%	0.21%	0.09%	2.4%	5.96%
044	60,002	491	0.83%	46,773	77.95%	64.71%	10.98%	11.99%	5.71%	0.18%	0.02%	1.17%	5.24%
045	59,738	227	0.38%	44,023	73.69%	72.29%	4.14%	5.5%	12.94%	0.07%	0.02%	0.67%	4.38%
046	59,108	-403	-0.68%	44,132	74.66%	72.43%	6.76%	8.24%	6.93%	0.12%	0.04%	0.82%	4.66%
047	59,126	-385	-0.65%	43,932	74.3%	61.71%	9.44%	7.83%	15.91%	0.2%	0.03%	0.7%	4.17%
048	59,003	-508	-0.85%	44,779	75.89%	59.05%	10.16%	14.1%	11.77%	0.08%	0.05%	0.64%	4.16%
049	59,153	-358	-0.60%	45,263	76.52%	68.94%	7.2%	7.56%	11.41%	0.1%	0.02%	0.68%	4.09%
050	59,523	12	0.02%	43,940	73.82%	41.55%	11.04%	7.06%	35.46%	0.09%	0.04%	0.66%	4.1%
051	58,952	-559	-0.94%	47,262	80.17%	51.02%	21.93%	15.47%	5.83%	0.17%	0.04%	1.03%	4.51%
052	59,811	300	0.50%	48,525	81.13%	53.81%	13.71%	7.98%	19.72%	0.14%	0.06%	0.72%	3.86%
053	59,953	442	0.74%	46,944	78.3%	70.3%	12.31%	8.2%	4.46%	0.1%	0.02%	0.63%	3.98%
054	60,083	572	0.96%	50,338	83.78%	61.03%	12.98%	15.17%	6.51%	0.14%	0.03%	0.57%	3.56%
055	59,971	460	0.77%	49,255	82.13%	33.78%	54.54%	5.14%	2.85%	0.18%	0.03%	0.4%	3.09%
056	58,929	-582	-0.98%	52,757	89.53%	34.03%	46.33%	5.81%	9.32%	0.18%	0.07%	0.45%	3.8%
057	59,969	458	0.77%	52,097	86.87%	62.89%	15.57%	8.83%	7.58%	0.11%	0.02%	0.65%	4.36%
058	59,057	-454	-0.76%	50,514	85.53%	24.98%	63.09%	5.03%	2.76%	0.14%	0.03%	0.51%	3.45%
059	59,434	-77	-0.13%	49,179	82.75%	19.37%	69.55%	4.45%	2.52%	0.16%	0.02%	0.56%	3.36%
060	59,709	198	0.33%	45,490	76.19%	26.72%	61.76%	5.87%	2.04%	0.17%	0.05%	0.44%	2.96%
061	59,302	-209	-0.35%	45,447	76.64%	14.79%	71.51%	9.1%	0.87%	0.15%	0.06%	0.54%	2.98%
062	59,450	-61	-0.10%	46,426	78.09%	17.17%	70.09%	7.61%	1.13%	0.21%	0.04%	0.53%	3.22%
063	59,381	-130	-0.22%	45,043	75.85%	16.74%	68%	10.42%	1.32%	0.21%	0.03%	0.51%	2.78%
064	58,986	-525	-0.88%	44,189	74.91%	54.76%	29.35%	8.84%	1.37%	0.27%	0.03%	0.78%	4.6%
065	59,464	-47	-0.08%	44,386	74.64%	29.55%	60.08%	5.23%	1.08%	0.18%	0.06%	0.57%	3.27%
066	59,047	-464	-0.78%	44,278	74.99%	29.98%	52.03%	11.05%	1.72%	0.24%	0.07%	0.79%	4.11%
067	59,135	-376	-0.63%	44,299	74.91%	29.09%	57.14%	8.71%	1.29%	0.18%	0.03%	0.5%	3.06%
068	59,477	-34	-0.06%	44,835	75.38%	31.15%	54.67%	7.3%	2.79%	0.16%	0.04%	0.7%	3.19%
069	58,682	-829	-1.39%	45,548	77.62%	24.1%	61.87%	6.47%	3.04%	0.17%	0.04%	0.89%	3.41%
070	59,121	-390	-0.66%	45,249	76.54%	56.51%	27.61%	9.08%	2.17%	0.2%	0.05%	0.47%	3.9%
071	59,538	27	0.05%	44,582	74.88%	67.15%	18.89%	7.44%	0.96%	0.25%	0.02%	0.51%	4.78%
072	59,660	149	0.25%	46,229	77.49%	67.26%	19.34%	8.16%	0.96%	0.2%	0.02%	0.3%	3.75%
073	60,036	525	0.88%	45,736	76.18%	69.92%	11.27%	7.96%	5.88%	0.15%	0.03%	0.52%	4.26%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blk]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
074	58,956	-555	-0.93%	44,696	75.81%	61.32%	25.24%	6.67%	2.05%	0.2%	0.02%	0.52%	3.98%
075	59,743	232	0.39%	43,850	73.4%	9.24%	71.27%	12.97%	2.66%	0.19%	0.06%	0.71%	2.9%
076	59,759	248	0.42%	44,371	74.25%	8.61%	64.24%	15.61%	8.11%	0.19%	0.04%	0.57%	2.63%
077	59,242	-269	-0.45%	44,207	74.62%	6.22%	72.49%	14.22%	4.03%	0.22%	0.06%	0.5%	2.27%
078	59,044	-467	-0.78%	44,572	75.49%	12.69%	69.39%	9.94%	4.03%	0.19%	0.03%	0.65%	3.08%
079	59,500	-11	-0.02%	43,223	72.64%	5.69%	68.19%	18.11%	4.87%	0.21%	0.01%	0.57%	2.34%
080	59,461	-50	-0.08%	44,784	75.32%	45.02%	11.65%	26.17%	13.02%	0.08%	0.04%	0.63%	3.39%
081	59,007	-504	-0.85%	46,259	78.4%	44.28%	18.64%	24.58%	8.14%	0.14%	0.02%	0.55%	3.65%
082	59,724	213	0.36%	50,238	84.12%	61.86%	14.34%	7.52%	11.03%	0.11%	0.03%	0.65%	4.46%
083	59,416	-95	-0.16%	46,581	78.4%	44.13%	12.06%	33.75%	6.29%	0.1%	0.02%	0.61%	3.03%
084	59,862	351	0.59%	47,350	79.1%	21.11%	69.74%	3.4%	1.4%	0.16%	0.03%	0.59%	3.58%
085	59,373	-138	-0.23%	46,308	78%	17.08%	60.18%	5.99%	12.29%	0.25%	0.02%	0.68%	3.5%
086	59,205	-306	-0.51%	44,614	75.36%	10.6%	71.76%	4.64%	9.02%	0.15%	0.02%	0.67%	3.14%
087	59,709	198	0.33%	45,615	76.4%	11.48%	70.08%	7.73%	6.46%	0.21%	0.02%	0.7%	3.33%
088	59,689	178	0.30%	46,073	77.19%	15.98%	60.71%	11.46%	7.49%	0.23%	0.06%	0.68%	3.39%
089	59,866	355	0.60%	46,198	77.17%	30.38%	59.77%	3.8%	1.78%	0.15%	0.03%	0.48%	3.6%
090	59,812	301	0.51%	48,015	80.28%	32.08%	57.15%	4.65%	1.58%	0.12%	0.03%	0.62%	3.76%
091	60,050	539	0.91%	46,173	76.89%	19.7%	67.92%	7%	1.39%	0.17%	0.04%	0.54%	3.25%
092	60,273	762	1.28%	46,551	77.23%	20.98%	67.63%	5.49%	1.58%	0.16%	0.04%	0.74%	3.39%
093	60,118	607	1.02%	44,734	74.41%	19.94%	63.27%	11.24%	1.34%	0.16%	0.1%	0.69%	3.26%
094	59,211	-300	-0.50%	44,809	75.68%	16.38%	65.88%	8.72%	4.85%	0.19%	0.02%	0.58%	3.37%
095	60,030	519	0.87%	44,948	74.88%	18.79%	64.99%	9.32%	2.29%	0.19%	0.05%	0.73%	3.63%
096	59,515	4	0.01%	44,671	75.06%	17.47%	20.71%	40.49%	17.64%	0.15%	0.06%	0.72%	2.76%
097	59,072	-439	-0.74%	46,339	78.44%	33.19%	25.12%	21.86%	15%	0.19%	0.05%	0.68%	3.92%
098	59,998	487	0.82%	42,734	71.23%	9.69%	19.56%	57.42%	10.69%	0.13%	0.05%	0.6%	1.86%
099	59,850	339	0.57%	45,004	75.19%	39.77%	13.49%	9.52%	32.49%	0.15%	0.04%	0.56%	3.98%
100	60,030	519	0.87%	42,669	71.08%	55.88%	9.01%	10.85%	19.49%	0.18%	0.05%	0.53%	4.01%
101	59,938	427	0.72%	46,584	77.72%	37.36%	22.37%	20.17%	15.23%	0.16%	0.05%	0.7%	3.96%
102	58,959	-552	-0.93%	42,968	72.88%	26.79%	36.41%	23.45%	8.97%	0.22%	0.03%	0.69%	3.44%
103	60,197	686	1.15%	44,399	73.76%	49.51%	15.16%	19.06%	11.68%	0.13%	0.04%	0.61%	3.81%
104	59,362	-149	-0.25%	43,306	72.95%	60.44%	15.61%	12.64%	6.32%	0.16%	0.04%	0.6%	4.2%
105	59,344	-167	-0.28%	43,474	73.26%	38.89%	27.8%	18.1%	10.56%	0.1%	0.03%	0.65%	3.88%
106	59,112	-399	-0.67%	43,890	74.25%	36.66%	35.66%	12.66%	9.78%	0.17%	0.03%	0.81%	4.23%
107	59,702	191	0.32%	44,509	74.55%	19.03%	27.46%	34.49%	15.45%	0.16%	0.03%	0.64%	2.73%
108	59,577	66	0.11%	44,308	74.37%	38.96%	17.34%	20.98%	18.06%	0.17%	0.03%	0.67%	3.78%
109	59,630	119	0.20%	44,140	74.02%	13.5%	29.44%	39.32%	14.39%	0.14%	0.05%	0.63%	2.54%
110	59,951	440	0.74%	43,226	72.1%	32.7%	45.9%	11.87%	4.49%	0.18%	0.04%	0.84%	3.97%
111	60,009	498	0.84%	44,096	73.48%	60.53%	21.74%	10.37%	2.5%	0.18%	0.04%	0.73%	3.91%
112	59,349	-162	-0.27%	45,120	76.02%	71.55%	18.88%	4%	1.27%	0.2%	0.04%	0.47%	3.59%
113	60,053	542	0.91%	44,538	74.16%	28.82%	57.75%	7.78%	0.79%	0.14%	0.12%	0.62%	3.98%
114	59,867	356	0.60%	45,872	76.62%	66.9%	23.89%	4.53%	0.7%	0.18%	0.03%	0.45%	3.33%
115	60,174	663	1.11%	44,807	74.46%	33.12%	51.3%	7.88%	2.67%	0.17%	0.04%	0.81%	4%
116	59,913	402	0.68%	45,791	76.43%	23.87%	56.71%	8.14%	6.39%	0.18%	0.08%	0.83%	3.81%
117	60,130	619	1.04%	44,973	74.79%	51.61%	35.88%	6.28%	1.53%	0.17%	0.04%	0.59%	3.9%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blk]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
118	59,987	476	0.80%	46,342	77.25%	68.26%	22.55%	4.5%	0.43%	0.18%	0.02%	0.47%	3.59%
119	58,947	-564	-0.95%	44,005	74.65%	66.88%	12.47%	12.17%	3.83%	0.16%	0.02%	0.58%	3.89%
120	58,982	-529	-0.89%	46,767	79.29%	69.85%	13.48%	8.42%	4.05%	0.15%	0.05%	0.5%	3.49%
121	59,127	-384	-0.65%	46,598	78.81%	75.06%	8.66%	6.27%	5.64%	0.11%	0%	0.53%	3.73%
122	59,632	121	0.20%	48,840	81.9%	49.13%	30.63%	13.78%	2.13%	0.28%	0.06%	0.86%	3.13%
123	59,282	-229	-0.38%	46,572	78.56%	65.88%	23.82%	5.33%	1.14%	0.17%	0.02%	0.26%	3.39%
124	59,221	-290	-0.49%	47,638	80.44%	61.53%	26.06%	7.57%	1.14%	0.19%	0.02%	0.37%	3.12%
125	60,137	626	1.05%	43,812	72.85%	60%	21.67%	8.93%	2.4%	0.29%	0.19%	0.52%	5.99%
126	59,260	-251	-0.42%	45,497	76.78%	37.81%	53.88%	3.63%	0.76%	0.27%	0.15%	0.37%	3.13%
127	58,678	-833	-1.40%	45,889	78.2%	65.92%	17.12%	5.58%	5.63%	0.18%	0.18%	0.51%	4.88%
128	58,864	-647	-1.09%	46,488	78.98%	44.14%	51%	1.91%	0.36%	0.19%	0.03%	0.17%	2.22%
129	58,829	-682	-1.15%	46,873	79.68%	33.83%	54.95%	4.74%	2.1%	0.21%	0.14%	0.43%	3.6%
130	59,203	-308	-0.52%	44,019	74.35%	30.19%	60.27%	4.33%	0.79%	0.24%	0.16%	0.42%	3.6%
131	58,890	-621	-1.04%	42,968	72.96%	65.57%	15.99%	7.07%	4.92%	0.19%	0.14%	0.61%	5.51%
132	59,142	-369	-0.62%	46,752	79.05%	33.1%	51.88%	7.91%	2.38%	0.26%	0.19%	0.37%	3.91%
133	59,202	-309	-0.52%	47,222	79.76%	56.35%	37.05%	2.42%	1.12%	0.15%	0.04%	0.38%	2.48%
134	59,396	-115	-0.19%	45,110	75.95%	56.72%	34.18%	4.39%	0.74%	0.22%	0.02%	0.35%	3.37%
135	60,063	552	0.93%	46,725	77.79%	70.69%	22.83%	2.21%	0.51%	0.16%	0.01%	0.33%	3.25%
136	59,298	-213	-0.36%	45,367	76.51%	62.16%	28%	4.4%	1.54%	0.24%	0.03%	0.42%	3.21%
137	59,551	40	0.07%	45,358	76.17%	38.1%	51.27%	5.17%	1.66%	0.12%	0.14%	0.37%	3.17%
138	58,912	-599	-1.01%	45,684	77.55%	70.29%	18.77%	4.1%	2.39%	0.25%	0.06%	0.36%	3.77%
139	59,010	-501	-0.84%	45,522	77.14%	63.55%	19.18%	7.24%	4.03%	0.25%	0.21%	0.59%	4.96%
140	59,294	-217	-0.36%	44,411	74.9%	28.76%	55.8%	9.04%	1.02%	0.27%	0.24%	0.53%	4.34%
141	59,019	-492	-0.83%	44,677	75.7%	29.41%	54.88%	7.93%	2.53%	0.24%	0.3%	0.45%	4.25%
142	59,608	97	0.16%	44,584	74.8%	30.78%	60.48%	4.23%	1.29%	0.16%	0.01%	0.36%	2.68%
143	59,469	-42	-0.07%	46,390	78.01%	29.08%	61.66%	4.87%	0.97%	0.19%	0.05%	0.36%	2.82%
144	59,232	-279	-0.47%	46,370	78.29%	60.82%	29.32%	2.91%	3.46%	0.14%	0.02%	0.36%	2.97%
145	59,863	352	0.59%	45,844	76.58%	51.64%	35.66%	7.02%	0.9%	0.28%	0.04%	0.41%	4.05%
146	60,203	692	1.16%	44,589	74.06%	59.32%	26.73%	5.66%	2.67%	0.17%	0.09%	0.45%	4.91%
147	59,178	-333	-0.56%	44,902	75.88%	51.94%	29.55%	8.3%	4.76%	0.23%	0.07%	0.51%	4.64%
148	59,984	473	0.79%	46,614	77.71%	58.49%	33.89%	3.66%	0.9%	0.12%	0.04%	0.28%	2.63%
149	58,893	-618	-1.04%	46,821	79.5%	60.01%	31.14%	5.61%	0.57%	0.17%	0.03%	0.2%	2.28%
150	59,276	-235	-0.39%	47,050	79.37%	36.16%	53.23%	7.23%	1.17%	0.17%	0.03%	0.17%	1.85%
151	60,059	548	0.92%	46,973	78.21%	45.21%	42.21%	7.51%	1.29%	0.18%	0.23%	0.25%	3.12%
152	60,134	623	1.05%	46,026	76.54%	66.12%	25.86%	2.84%	1.6%	0.21%	0.03%	0.3%	3.03%
153	59,299	-212	-0.36%	45,692	77.05%	24.38%	69.08%	2.93%	0.89%	0.13%	0.02%	0.24%	2.33%
154	59,994	483	0.81%	47,273	78.8%	39.54%	55.53%	2.1%	0.38%	0.16%	0.01%	0.2%	2.09%
155	58,759	-752	-1.26%	45,208	76.94%	57.32%	36.14%	2.62%	0.91%	0.18%	0.05%	0.26%	2.52%
156	59,444	-67	-0.11%	45,867	77.16%	58.49%	29.79%	8.27%	0.6%	0.17%	0.01%	0.25%	2.42%
157	59,957	446	0.75%	45,311	75.57%	61.81%	23.59%	11.19%	0.54%	0.16%	0.04%	0.21%	2.47%
158	59,440	-71	-0.12%	45,549	76.63%	59.27%	31.5%	5.6%	0.75%	0.18%	0.03%	0.25%	2.42%
159	59,895	384	0.65%	44,871	74.92%	67.46%	23.88%	3.65%	0.54%	0.28%	0.03%	0.34%	3.82%
160	59,935	424	0.71%	48,057	80.18%	66.84%	21.68%	5.5%	1.62%	0.24%	0.1%	0.28%	3.76%
161	60,097	586	0.98%	44,371	73.83%	57.53%	25.83%	7.89%	3.03%	0.24%	0.09%	0.5%	4.9%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blk]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
162	60,308	797	1.34%	46,733	77.49%	36.7%	43.34%	10.78%	4%	0.2%	0.24%	0.54%	4.19%
163	60,123	612	1.03%	48,461	80.6%	38.48%	46.14%	8.45%	3.12%	0.19%	0.13%	0.39%	3.1%
164	60,101	590	0.99%	45,851	76.29%	57.7%	22.03%	9.95%	4.21%	0.24%	0.12%	0.68%	5.08%
165	59,978	467	0.78%	48,247	80.44%	35.1%	52.41%	5.53%	3.19%	0.22%	0.14%	0.38%	3.02%
166	60,242	731	1.23%	47,580	78.98%	82.79%	4.94%	5.19%	2.65%	0.16%	0.05%	0.4%	3.82%
167	59,493	-18	-0.03%	44,140	74.19%	62.89%	20.99%	8.81%	1.42%	0.35%	0.23%	0.5%	4.79%
168	60,147	636	1.07%	44,867	74.6%	36.24%	43.3%	11.22%	1.98%	0.31%	0.67%	0.48%	5.79%
169	59,138	-373	-0.63%	45,267	76.54%	58.36%	28.84%	9.03%	0.79%	0.15%	0.02%	0.2%	2.6%
170	60,116	605	1.02%	45,316	75.38%	60.65%	24.39%	10.43%	1.19%	0.13%	0.02%	0.28%	2.91%
171	59,237	-274	-0.46%	45,969	77.6%	51.23%	39.79%	5.73%	0.54%	0.21%	0.03%	0.21%	2.26%
172	59,961	450	0.76%	44,756	74.64%	57.24%	23.26%	16%	0.77%	0.21%	0.03%	0.23%	2.27%
173	59,743	232	0.39%	45,292	75.81%	52.67%	36.22%	6.95%	0.79%	0.33%	0.02%	0.3%	2.72%
174	59,852	341	0.57%	45,760	76.46%	70.83%	16.91%	7.88%	0.47%	0.35%	0.04%	0.22%	3.3%
175	59,993	482	0.81%	44,704	74.52%	64.08%	23.75%	6.1%	1.78%	0.26%	0.07%	0.34%	3.64%
176	59,470	-41	-0.07%	44,991	75.65%	63.56%	21.74%	9.95%	0.91%	0.24%	0.08%	0.29%	3.23%
177	59,992	481	0.81%	46,014	76.7%	33.22%	54.7%	6.69%	1.26%	0.21%	0.07%	0.42%	3.42%
178	59,877	366	0.62%	45,638	76.22%	75.62%	14.4%	6.22%	0.52%	0.18%	0.01%	0.29%	2.76%
179	59,356	-155	-0.26%	47,156	79.45%	59.03%	28.39%	7.73%	1.06%	0.17%	0.13%	0.39%	3.11%
180	59,412	-99	-0.17%	45,362	76.35%	68.71%	16.96%	6.47%	1.56%	0.32%	0.11%	0.57%	5.3%

Total: **10,711,908**
Ideal District: **59,511**

User: **State**
Plan Name: **House-prop1-2021**
Plan Type: **House**

Population Summary

Summary Statistics:

Population Range:	58,678 to 60,308
Ratio Range:	0.03
Absolute Range:	-833 to 797
Absolute Overall Range:	1,630
Relative Range:	-1.40% to 1.34%
Relative Overall Range:	2.74%
Absolute Mean Deviation:	363.71
Relative Mean Deviation:	0.61%
Standard Deviation:	417.67

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	59,666	155	0.26%	46,801	78.44%	89.43%	3.65%	2.11%	0.57%	0.32%	0.05%	0.21%	3.65%
002	59,773	262	0.44%	46,159	77.22%	85.33%	2.64%	7.57%	1.07%	0.2%	0.02%	0.2%	2.97%
003	60,199	688	1.16%	46,716	77.6%	88.46%	2.71%	2.96%	1.56%	0.28%	0.14%	0.14%	3.77%
004	59,070	-441	-0.74%	42,798	72.45%	47.78%	4.53%	44.13%	1.28%	0.19%	0.02%	0.21%	1.86%
005	58,837	-674	-1.13%	44,623	75.84%	78.55%	3.81%	12.62%	1.26%	0.22%	0.03%	0.19%	3.31%
006	59,712	201	0.34%	45,152	75.62%	83%	1%	11.96%	0.51%	0.25%	0.02%	0.17%	3.09%
007	59,081	-430	-0.72%	48,771	82.55%	90.15%	0.34%	5.53%	0.46%	0.27%	0.01%	0.21%	3.02%
008	59,244	-267	-0.45%	49,612	83.74%	91.87%	1.12%	2.74%	0.54%	0.3%	0%	0.29%	3.13%
009	59,474	-37	-0.06%	48,273	81.17%	88.93%	1.06%	4.74%	0.83%	0.41%	0.06%	0.33%	3.64%
010	59,519	8	0.01%	47,164	79.24%	81.82%	3.19%	10.04%	1.58%	0.18%	0.03%	0.21%	2.95%
011	58,792	-719	-1.21%	45,396	77.21%	89.31%	1.43%	4.23%	1.06%	0.23%	0.03%	0.27%	3.44%
012	59,300	-211	-0.35%	46,487	78.39%	80.42%	8.94%	6.15%	1.01%	0.18%	0%	0.33%	2.97%
013	59,150	-361	-0.61%	45,176	76.38%	66.3%	18.03%	10.84%	1.36%	0.22%	0.02%	0.26%	2.97%
014	59,135	-376	-0.63%	45,511	76.96%	83.02%	6.06%	5.88%	0.8%	0.25%	0.02%	0.31%	3.65%
015	59,213	-298	-0.50%	45,791	77.33%	71.9%	13.11%	9.67%	1.36%	0.27%	0.03%	0.36%	3.3%
016	59,402	-109	-0.18%	44,009	74.09%	76.42%	10.83%	8.61%	0.79%	0.21%	0.05%	0.32%	2.76%
017	59,120	-391	-0.66%	42,761	72.33%	66.02%	21.24%	6.94%	1.41%	0.25%	0.06%	0.54%	3.55%
018	59,335	-176	-0.30%	45,159	76.11%	86.01%	7.17%	2.39%	0.62%	0.26%	0.04%	0.26%	3.24%
019	58,955	-556	-0.93%	44,299	75.14%	65.37%	22.26%	6.8%	1.21%	0.21%	0.07%	0.48%	3.59%
020	60,107	596	1.00%	45,725	76.07%	76.4%	7.96%	9.18%	2.03%	0.14%	0.04%	0.55%	3.7%
021	59,529	18	0.03%	44,931	75.48%	82.07%	4.23%	7.44%	1.87%	0.22%	0.05%	0.61%	3.51%
022	59,460	-51	-0.09%	45,815	77.05%	65.61%	13.32%	11.57%	4.04%	0.21%	0.03%	0.76%	4.47%
023	59,048	-463	-0.78%	44,254	74.95%	75.29%	5.48%	14.23%	1.12%	0.21%	0.05%	0.32%	3.3%
024	59,011	-500	-0.84%	41,814	70.86%	63.42%	6.04%	10.32%	16.41%	0.17%	0.05%	0.56%	3.03%
025	59,414	-97	-0.16%	42,520	71.57%	56.12%	5.08%	5.09%	30.56%	0.1%	0.03%	0.45%	2.56%
026	59,248	-263	-0.44%	44,081	74.4%	68.21%	3.18%	10.76%	14.26%	0.12%	0.04%	0.44%	2.99%
027	58,795	-716	-1.20%	46,004	78.24%	82.61%	3.07%	9.6%	0.83%	0.2%	0.04%	0.24%	3.4%
028	58,972	-539	-0.91%	44,444	75.36%	79.36%	3.15%	11.44%	2.16%	0.17%	0.03%	0.36%	3.33%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
029	59,200	-311	-0.52%	43,131	72.86%	42.29%	12.55%	39.71%	3.02%	0.14%	0.06%	0.33%	1.91%
030	59,266	-245	-0.41%	45,414	76.63%	70.5%	7.19%	16.13%	2.96%	0.15%	0.02%	0.28%	2.77%
031	59,901	390	0.66%	43,120	71.99%	68.65%	6.79%	18.95%	2.35%	0.21%	0.03%	0.32%	2.69%
032	59,145	-366	-0.62%	45,942	77.68%	82.98%	7.21%	4.87%	1.25%	0.32%	0.05%	0.2%	3.12%
033	59,187	-324	-0.54%	46,498	78.56%	82.25%	10.57%	3.13%	1.16%	0.15%	0.01%	0.29%	2.43%
034	59,875	364	0.61%	45,758	76.42%	69.23%	14.11%	7.85%	4.43%	0.12%	0.03%	0.65%	3.58%
035	59,889	378	0.64%	48,312	80.67%	53.63%	25.59%	11.15%	4.58%	0.19%	0.05%	0.77%	4.04%
036	59,994	483	0.81%	44,911	74.86%	70.77%	15.48%	6.51%	3.02%	0.15%	0.04%	0.6%	3.44%
037	59,176	-335	-0.56%	46,223	78.11%	46.26%	25.84%	18.64%	4.61%	0.21%	0.02%	0.91%	3.52%
038	59,317	-194	-0.33%	44,839	75.59%	30.1%	51.13%	12.62%	1.87%	0.24%	0.05%	0.63%	3.36%
039	59,381	-130	-0.22%	44,436	74.83%	23.47%	52.5%	18.66%	1.77%	0.17%	0.03%	0.6%	2.79%
040	59,044	-467	-0.78%	47,976	81.25%	51.14%	30.35%	5.92%	8.24%	0.15%	0.01%	0.63%	3.55%
041	60,122	611	1.03%	45,271	75.3%	27.62%	36.96%	28.55%	3.13%	0.22%	0.05%	0.84%	2.62%
042	59,620	109	0.18%	48,525	81.39%	39%	30.85%	17.38%	7.45%	0.2%	0.04%	1.14%	3.94%
043	59,464	-47	-0.08%	47,033	79.09%	46.31%	24.03%	14.15%	7.62%	0.21%	0.09%	2.27%	5.32%
044	60,002	491	0.83%	46,773	77.95%	67.69%	10.5%	10.53%	5.78%	0.2%	0.02%	1.06%	4.23%
045	59,738	227	0.38%	44,023	73.69%	74.94%	4.27%	4.85%	12.05%	0.05%	0.02%	0.59%	3.23%
046	59,108	-403	-0.68%	44,132	74.66%	74.81%	6.79%	7.38%	6.72%	0.13%	0.04%	0.61%	3.53%
047	59,126	-385	-0.65%	43,932	74.3%	63.89%	9.3%	7.37%	15.16%	0.17%	0.03%	0.62%	3.46%
048	59,003	-508	-0.85%	44,779	75.89%	61.77%	10.14%	12.41%	11.59%	0.08%	0.04%	0.56%	3.42%
049	59,153	-358	-0.60%	45,263	76.52%	71.48%	7.22%	6.7%	10.74%	0.1%	0.03%	0.63%	3.12%
050	59,523	12	0.02%	43,940	73.82%	44.37%	10.8%	6.36%	34.63%	0.07%	0.05%	0.58%	3.13%
051	58,952	-559	-0.94%	47,262	80.17%	54.33%	21.3%	13.31%	5.93%	0.18%	0.05%	1.01%	3.89%
052	59,811	300	0.50%	48,525	81.13%	55.14%	14.19%	7.41%	19.12%	0.14%	0.07%	0.68%	3.24%
053	59,953	442	0.74%	46,944	78.3%	71.2%	12.71%	7.44%	4.58%	0.09%	0.02%	0.54%	3.41%
054	60,083	572	0.96%	50,338	83.78%	62.98%	13.67%	12.79%	6.86%	0.13%	0.03%	0.53%	3.02%
055	59,971	460	0.77%	49,255	82.13%	35.51%	52.85%	4.97%	3.19%	0.18%	0.04%	0.37%	2.88%
056	58,929	-582	-0.98%	52,757	89.53%	36.98%	42.9%	5.84%	9.92%	0.2%	0.08%	0.41%	3.67%
057	59,969	458	0.77%	52,097	86.87%	63.64%	16.18%	7.95%	7.99%	0.1%	0.02%	0.6%	3.52%
058	59,057	-454	-0.76%	50,514	85.53%	27.56%	60.36%	5.07%	3.04%	0.12%	0.04%	0.51%	3.3%
059	59,434	-77	-0.13%	49,179	82.75%	22.04%	66.72%	4.43%	2.9%	0.17%	0.02%	0.54%	3.18%
060	59,709	198	0.33%	45,490	76.19%	28.09%	61.3%	5.11%	2.17%	0.18%	0.05%	0.43%	2.67%
061	59,302	-209	-0.35%	45,447	76.64%	16.75%	71.33%	7.61%	0.97%	0.17%	0.05%	0.51%	2.6%
062	59,450	-61	-0.10%	46,426	78.09%	19.07%	69.19%	6.83%	1.3%	0.21%	0.05%	0.47%	2.88%
063	59,381	-130	-0.22%	45,043	75.85%	19.22%	66.7%	9.26%	1.54%	0.21%	0.04%	0.47%	2.56%
064	58,986	-525	-0.88%	44,189	74.91%	57.83%	28.63%	7.44%	1.41%	0.3%	0.04%	0.7%	3.67%
065	59,464	-47	-0.08%	44,386	74.64%	31.46%	59.19%	4.53%	1.15%	0.19%	0.05%	0.51%	2.92%
066	59,047	-464	-0.78%	44,278	74.99%	33.93%	50.39%	9.49%	1.86%	0.26%	0.08%	0.63%	3.36%
067	59,135	-376	-0.63%	44,299	74.91%	30.86%	56.59%	7.75%	1.39%	0.19%	0.03%	0.49%	2.7%
068	59,477	-34	-0.06%	44,835	75.38%	33.94%	53.42%	6.33%	2.77%	0.14%	0.05%	0.63%	2.72%
069	58,682	-829	-1.39%	45,548	77.62%	26.89%	60.9%	5.42%	3.12%	0.18%	0.04%	0.78%	2.68%
070	59,121	-390	-0.66%	45,249	76.54%	59.69%	26.23%	7.96%	2.23%	0.22%	0.06%	0.4%	3.22%
071	59,538	27	0.05%	44,582	74.88%	69.8%	18.45%	6.18%	1.01%	0.24%	0.02%	0.42%	3.88%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
072	59,660	149	0.25%	46,229	77.49%	69.24%	19.51%	6.94%	0.93%	0.19%	0.02%	0.23%	2.94%
073	60,036	525	0.88%	45,736	76.18%	72.58%	10.84%	7.05%	5.58%	0.14%	0.03%	0.4%	3.38%
074	58,956	-555	-0.93%	44,696	75.81%	64.44%	24%	5.55%	2.04%	0.21%	0.02%	0.47%	3.26%
075	59,743	232	0.39%	43,850	73.4%	11.27%	71.04%	11.28%	2.93%	0.18%	0.07%	0.66%	2.57%
076	59,759	248	0.42%	44,371	74.25%	10.51%	64.4%	13.23%	8.69%	0.21%	0.05%	0.51%	2.41%
077	59,242	-269	-0.45%	44,207	74.62%	7.58%	73.27%	12.2%	4.36%	0.23%	0.06%	0.41%	1.9%
078	59,044	-467	-0.78%	44,572	75.49%	15.05%	68.35%	8.89%	4.21%	0.2%	0.03%	0.63%	2.63%
079	59,500	-11	-0.02%	43,223	72.64%	7.15%	68.44%	16.03%	5.51%	0.2%	0.01%	0.56%	2.09%
080	59,461	-50	-0.08%	44,784	75.32%	47.63%	12.45%	23.12%	13.33%	0.07%	0.04%	0.56%	2.79%
081	59,007	-504	-0.85%	46,259	78.4%	47.01%	19.77%	20.92%	8.71%	0.14%	0.01%	0.46%	2.98%
082	59,724	213	0.36%	50,238	84.12%	62.46%	15.19%	6.79%	11.35%	0.11%	0.04%	0.56%	3.51%
083	59,416	-95	-0.16%	46,581	78.4%	47.9%	13.51%	28.47%	6.91%	0.1%	0.02%	0.55%	2.55%
084	59,862	351	0.59%	47,350	79.1%	21.29%	70.47%	2.96%	1.48%	0.16%	0.02%	0.55%	3.07%
085	59,373	-138	-0.23%	46,308	78%	19.48%	59.85%	5.92%	10.8%	0.21%	0.02%	0.57%	3.14%
086	59,205	-306	-0.51%	44,614	75.36%	12.08%	72.02%	4.29%	7.95%	0.15%	0.01%	0.65%	2.84%
087	59,709	198	0.33%	45,615	76.4%	13.5%	69.72%	6.69%	6.22%	0.24%	0.02%	0.64%	2.97%
088	59,689	178	0.30%	46,073	77.19%	18.3%	60.15%	9.97%	7.64%	0.22%	0.07%	0.64%	3.01%
089	59,866	355	0.60%	46,198	77.17%	31.07%	60.06%	3.42%	1.92%	0.15%	0.03%	0.41%	2.93%
090	59,812	301	0.51%	48,015	80.28%	33.98%	56.05%	4.26%	1.82%	0.12%	0.03%	0.53%	3.2%
091	60,050	539	0.91%	46,173	76.89%	22%	67.15%	5.86%	1.44%	0.15%	0.05%	0.49%	2.86%
092	60,273	762	1.28%	46,551	77.23%	24.05%	65.71%	4.68%	1.67%	0.17%	0.03%	0.61%	3.08%
093	60,118	607	1.02%	44,734	74.41%	22.91%	62.36%	9.58%	1.48%	0.17%	0.09%	0.61%	2.81%
094	59,211	-300	-0.50%	44,809	75.68%	18.42%	65.61%	7.29%	4.85%	0.19%	0.02%	0.54%	3.07%
095	60,030	519	0.87%	44,948	74.88%	21.83%	63.61%	7.94%	2.43%	0.22%	0.04%	0.67%	3.27%
096	59,515	4	0.01%	44,671	75.06%	20.32%	20.75%	36.03%	19.7%	0.11%	0.04%	0.6%	2.44%
097	59,072	-439	-0.74%	46,339	78.44%	36.44%	24.16%	19.23%	16.07%	0.19%	0.05%	0.6%	3.25%
098	59,998	487	0.82%	42,734	71.23%	11.66%	20.91%	52.77%	12.28%	0.12%	0.05%	0.51%	1.71%
099	59,850	339	0.57%	45,004	75.19%	42.1%	13.07%	8.67%	32.63%	0.13%	0.04%	0.48%	2.89%
100	60,030	519	0.87%	42,669	71.08%	59.05%	8.86%	9.98%	18.41%	0.19%	0.06%	0.43%	3.02%
101	59,938	427	0.72%	46,584	77.72%	40.14%	21.87%	18.24%	15.98%	0.16%	0.05%	0.54%	3.02%
102	58,959	-552	-0.93%	42,968	72.88%	30.65%	34.79%	21.34%	9.57%	0.2%	0.03%	0.52%	2.89%
103	60,197	686	1.15%	44,399	73.76%	52.42%	15.01%	16.89%	12.19%	0.12%	0.03%	0.5%	2.83%
104	59,362	-149	-0.25%	43,306	72.95%	62.96%	15.44%	11.14%	6.38%	0.18%	0.05%	0.51%	3.34%
105	59,344	-167	-0.28%	43,474	73.26%	41.74%	26.67%	16.76%	11.05%	0.1%	0.03%	0.54%	3.12%
106	59,112	-399	-0.67%	43,890	74.25%	41.22%	33.7%	11.14%	9.73%	0.16%	0.03%	0.74%	3.28%
107	59,702	191	0.32%	44,509	74.55%	21.96%	27.02%	31.09%	16.75%	0.18%	0.04%	0.56%	2.4%
108	59,577	66	0.11%	44,308	74.37%	43.36%	16.55%	18.16%	18.34%	0.18%	0.04%	0.53%	2.84%
109	59,630	119	0.20%	44,140	74.02%	15.44%	29.65%	36.12%	15.82%	0.12%	0.06%	0.55%	2.25%
110	59,951	440	0.74%	43,226	72.1%	36.58%	44.02%	10.49%	4.72%	0.18%	0.04%	0.72%	3.25%
111	60,009	498	0.84%	44,096	73.48%	64%	20.56%	8.84%	2.56%	0.2%	0.04%	0.64%	3.17%
112	59,349	-162	-0.27%	45,120	76.02%	73.73%	18.26%	3.28%	1.26%	0.22%	0.02%	0.41%	2.81%
113	60,053	542	0.91%	44,538	74.16%	31.8%	56.48%	6.65%	0.83%	0.15%	0.11%	0.59%	3.39%
114	59,867	356	0.60%	45,872	76.62%	68.84%	23.42%	3.73%	0.71%	0.18%	0.01%	0.35%	2.76%

Population Summary

House-prop1-2021

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
115	60,174	663	1.11%	44,807	74.46%	36.95%	49.2%	6.97%	2.68%	0.2%	0.05%	0.69%	3.26%
116	59,913	402	0.68%	45,791	76.43%	27.22%	54.93%	7.29%	6.48%	0.19%	0.09%	0.74%	3.05%
117	60,130	619	1.04%	44,973	74.79%	54.5%	34.54%	5.44%	1.54%	0.19%	0.04%	0.52%	3.22%
118	59,987	476	0.80%	46,342	77.25%	69.73%	22.7%	3.68%	0.42%	0.2%	0.02%	0.39%	2.85%
119	58,947	-564	-0.95%	44,005	74.65%	69.8%	12.31%	10.44%	3.75%	0.17%	0.02%	0.43%	3.08%
120	58,982	-529	-0.89%	46,767	79.29%	71.94%	13.21%	7.09%	4.18%	0.16%	0.05%	0.44%	2.91%
121	59,127	-384	-0.65%	46,598	78.81%	76.13%	8.6%	5.57%	5.84%	0.1%	0%	0.46%	3.3%
122	59,632	121	0.20%	48,840	81.9%	54.8%	27.13%	11.7%	2.41%	0.32%	0.06%	0.79%	2.79%
123	59,282	-229	-0.38%	46,572	78.56%	68.06%	23.42%	4.31%	1.06%	0.19%	0.02%	0.2%	2.75%
124	59,221	-290	-0.49%	47,638	80.44%	65.01%	24.61%	6.17%	1.08%	0.19%	0.02%	0.31%	2.61%
125	60,137	626	1.05%	43,812	72.85%	63.03%	21.43%	7.66%	2.6%	0.31%	0.16%	0.39%	4.41%
126	59,260	-251	-0.42%	45,497	76.78%	39.97%	52.63%	3.17%	0.89%	0.29%	0.16%	0.29%	2.62%
127	58,678	-833	-1.40%	45,889	78.2%	68.13%	16.88%	4.77%	5.68%	0.19%	0.16%	0.43%	3.77%
128	58,864	-647	-1.09%	46,488	78.98%	46.49%	49.38%	1.7%	0.35%	0.19%	0.01%	0.17%	1.71%
129	58,829	-682	-1.15%	46,873	79.68%	37.16%	52.33%	4.26%	2.4%	0.19%	0.15%	0.41%	3.1%
130	59,203	-308	-0.52%	44,019	74.35%	33.74%	57.69%	3.86%	0.97%	0.26%	0.19%	0.34%	2.95%
131	58,890	-621	-1.04%	42,968	72.96%	68.16%	15.87%	5.87%	5.21%	0.21%	0.1%	0.55%	4.03%
132	59,142	-369	-0.62%	46,752	79.05%	35.63%	49.82%	7.8%	2.74%	0.27%	0.16%	0.3%	3.28%
133	59,202	-309	-0.52%	47,222	79.76%	58.39%	35.87%	2.15%	1.15%	0.15%	0.04%	0.36%	1.89%
134	59,396	-115	-0.19%	45,110	75.95%	59.9%	32.37%	3.74%	0.81%	0.23%	0.02%	0.25%	2.69%
135	60,063	552	0.93%	46,725	77.79%	71.78%	22.84%	1.82%	0.55%	0.16%	0.01%	0.25%	2.57%
136	59,298	-213	-0.36%	45,367	76.51%	63.9%	27.76%	3.64%	1.55%	0.26%	0.04%	0.29%	2.55%
137	59,551	40	0.07%	45,358	76.17%	40.82%	50.02%	4.48%	1.73%	0.12%	0.12%	0.26%	2.44%
138	58,912	-599	-1.01%	45,684	77.55%	72.34%	18.26%	3.31%	2.43%	0.26%	0.07%	0.35%	2.97%
139	59,010	-501	-0.84%	45,522	77.14%	66.19%	18.56%	6.36%	3.89%	0.25%	0.24%	0.46%	4.04%
140	59,294	-217	-0.36%	44,411	74.9%	31.7%	54.74%	8.02%	1.17%	0.24%	0.2%	0.49%	3.43%
141	59,019	-492	-0.83%	44,677	75.7%	31.77%	54.65%	6.55%	2.69%	0.27%	0.3%	0.38%	3.38%
142	59,608	97	0.16%	44,584	74.8%	34.8%	57.42%	3.7%	1.4%	0.17%	0.02%	0.28%	2.2%
143	59,469	-42	-0.07%	46,390	78.01%	32.28%	58.98%	4.67%	1.07%	0.21%	0.05%	0.3%	2.44%
144	59,232	-279	-0.47%	46,370	78.29%	62.95%	28.34%	2.55%	3.45%	0.14%	0.02%	0.26%	2.29%
145	59,863	352	0.59%	45,844	76.58%	55.12%	33.97%	5.94%	0.99%	0.33%	0.03%	0.3%	3.32%
146	60,203	692	1.16%	44,589	74.06%	61.84%	26.08%	4.73%	2.98%	0.18%	0.09%	0.39%	3.71%
147	59,178	-333	-0.56%	44,902	75.88%	55.32%	28.41%	7.17%	4.85%	0.25%	0.07%	0.41%	3.52%
148	59,984	473	0.79%	46,614	77.71%	60.45%	33.11%	3.08%	0.87%	0.14%	0.04%	0.21%	2.1%
149	58,893	-618	-1.04%	46,821	79.5%	60.99%	30.75%	5.69%	0.57%	0.19%	0.04%	0.14%	1.63%
150	59,276	-235	-0.39%	47,050	79.37%	38.31%	52.5%	6.13%	1.18%	0.16%	0.03%	0.15%	1.54%
151	60,059	548	0.92%	46,973	78.21%	47.2%	40.96%	7.28%	1.43%	0.18%	0.18%	0.19%	2.58%
152	60,134	623	1.05%	46,026	76.54%	67.94%	25.26%	2.34%	1.52%	0.24%	0.04%	0.19%	2.46%
153	59,299	-212	-0.36%	45,692	77.05%	27.66%	66.38%	2.55%	1%	0.16%	0.03%	0.23%	2.01%
154	59,994	483	0.81%	47,273	78.8%	42.24%	53.68%	1.67%	0.36%	0.19%	0%	0.16%	1.7%
155	58,759	-752	-1.26%	45,208	76.94%	59.77%	34.6%	2.22%	0.95%	0.16%	0.04%	0.21%	2.05%
156	59,444	-67	-0.11%	45,867	77.16%	60.92%	29.32%	6.88%	0.62%	0.16%	0.01%	0.15%	1.93%
157	59,957	446	0.75%	45,311	75.57%	64.48%	23.7%	8.96%	0.57%	0.17%	0.04%	0.16%	1.93%

Population Summary

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
158	59,440	-71	-0.12%	45,549	76.63%	62.21%	30.2%	4.52%	0.71%	0.21%	0.03%	0.18%	1.93%
159	59,895	384	0.65%	44,871	74.92%	69.39%	23.44%	2.87%	0.57%	0.31%	0.04%	0.26%	3.12%
160	59,935	424	0.71%	48,057	80.18%	68.48%	21.07%	5.04%	1.64%	0.24%	0.09%	0.27%	3.17%
161	60,097	586	0.98%	44,371	73.83%	60.16%	25.26%	6.82%	3.16%	0.25%	0.09%	0.48%	3.77%
162	60,308	797	1.34%	46,733	77.49%	40.62%	41.13%	9.58%	4.16%	0.22%	0.24%	0.44%	3.61%
163	60,123	612	1.03%	48,461	80.6%	41.92%	43.78%	7.38%	3.6%	0.2%	0.1%	0.33%	2.68%
164	60,101	590	0.99%	45,851	76.29%	60.61%	21.43%	8.49%	4.37%	0.26%	0.12%	0.6%	4.12%
165	59,978	467	0.78%	48,247	80.44%	39.18%	48.49%	5.33%	3.68%	0.25%	0.14%	0.35%	2.57%
166	60,242	731	1.23%	47,580	78.98%	84.71%	4.96%	4.07%	2.69%	0.18%	0.05%	0.36%	2.97%
167	59,493	-18	-0.03%	44,140	74.19%	65.96%	20.55%	7.41%	1.48%	0.39%	0.18%	0.39%	3.66%
168	60,147	636	1.07%	44,867	74.6%	39.29%	42.28%	10.3%	2.32%	0.33%	0.65%	0.38%	4.46%
169	59,138	-373	-0.63%	45,267	76.54%	60.95%	28.12%	7.66%	0.88%	0.14%	0.03%	0.16%	2.06%
170	60,116	605	1.02%	45,316	75.38%	64.17%	23.21%	8.65%	1.19%	0.12%	0.02%	0.25%	2.38%
171	59,237	-274	-0.46%	45,969	77.6%	53.85%	38.58%	4.63%	0.56%	0.24%	0.02%	0.17%	1.95%
172	59,961	450	0.76%	44,756	74.64%	61.03%	22.46%	13.42%	0.78%	0.23%	0.03%	0.19%	1.87%
173	59,743	232	0.39%	45,292	75.81%	55.68%	35.18%	5.35%	0.84%	0.37%	0.02%	0.26%	2.31%
174	59,852	341	0.57%	45,760	76.46%	72.25%	16.08%	7.96%	0.52%	0.38%	0.03%	0.15%	2.64%
175	59,993	482	0.81%	44,704	74.52%	66.49%	23.13%	5.03%	1.85%	0.28%	0.06%	0.3%	2.86%
176	59,470	-41	-0.07%	44,991	75.65%	66.15%	21.61%	8.24%	0.96%	0.25%	0.1%	0.19%	2.49%
177	59,992	481	0.81%	46,014	76.7%	37.12%	51.68%	6.12%	1.36%	0.24%	0.08%	0.36%	3.04%
178	59,877	366	0.62%	45,638	76.22%	77.79%	13.99%	5.14%	0.54%	0.2%	0.01%	0.23%	2.09%
179	59,356	-155	-0.26%	47,156	79.45%	63.69%	25.74%	6.38%	1.07%	0.15%	0.11%	0.34%	2.51%
180	59,412	-99	-0.17%	45,362	76.35%	71.17%	16.63%	5.62%	1.67%	0.31%	0.11%	0.47%	4.02%

Total: **10,711,908**
Ideal District: **59,511**

HD 49

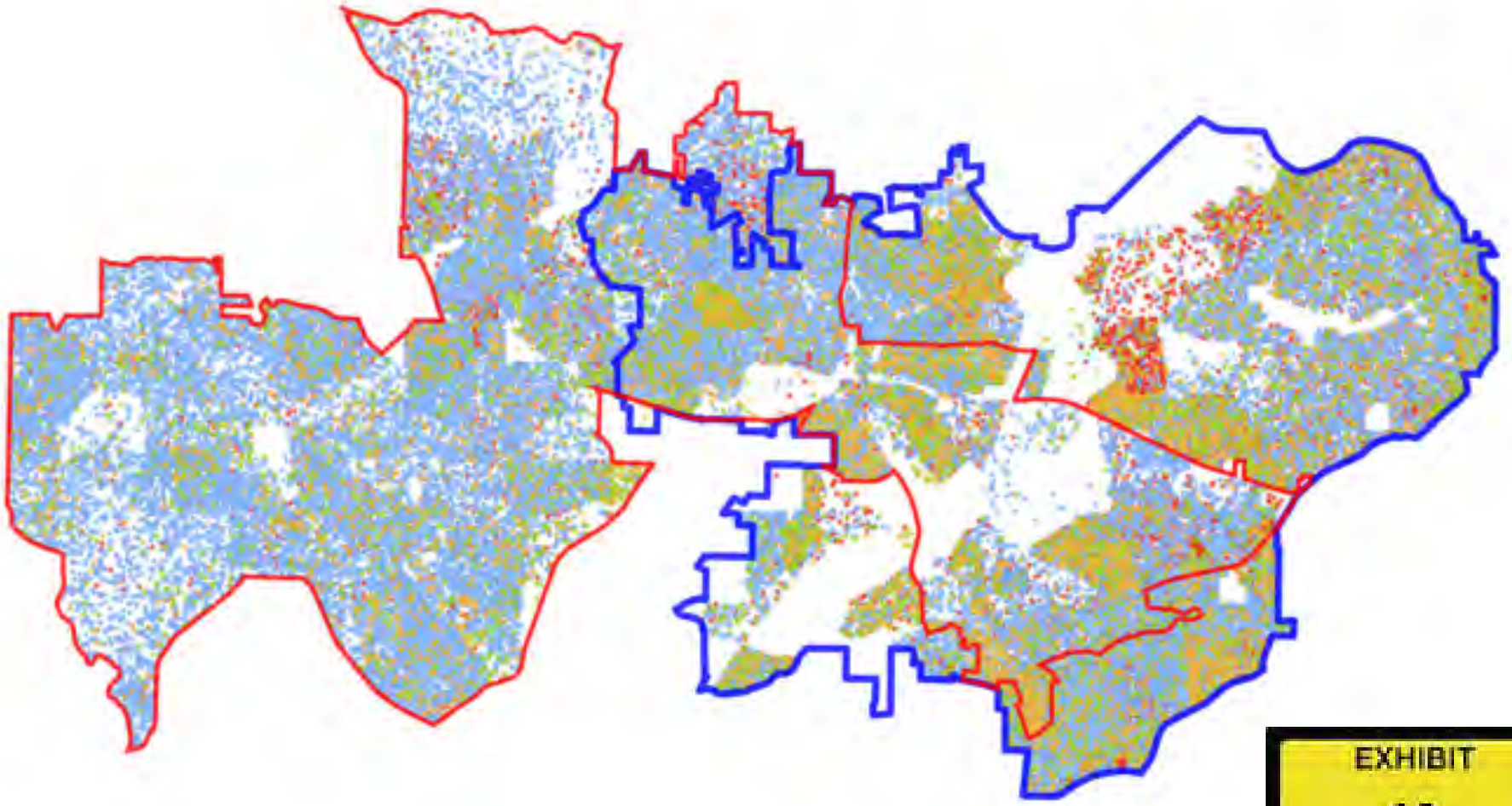


EXHIBIT
12

Asian White Black Latino = 1 person

HD 104

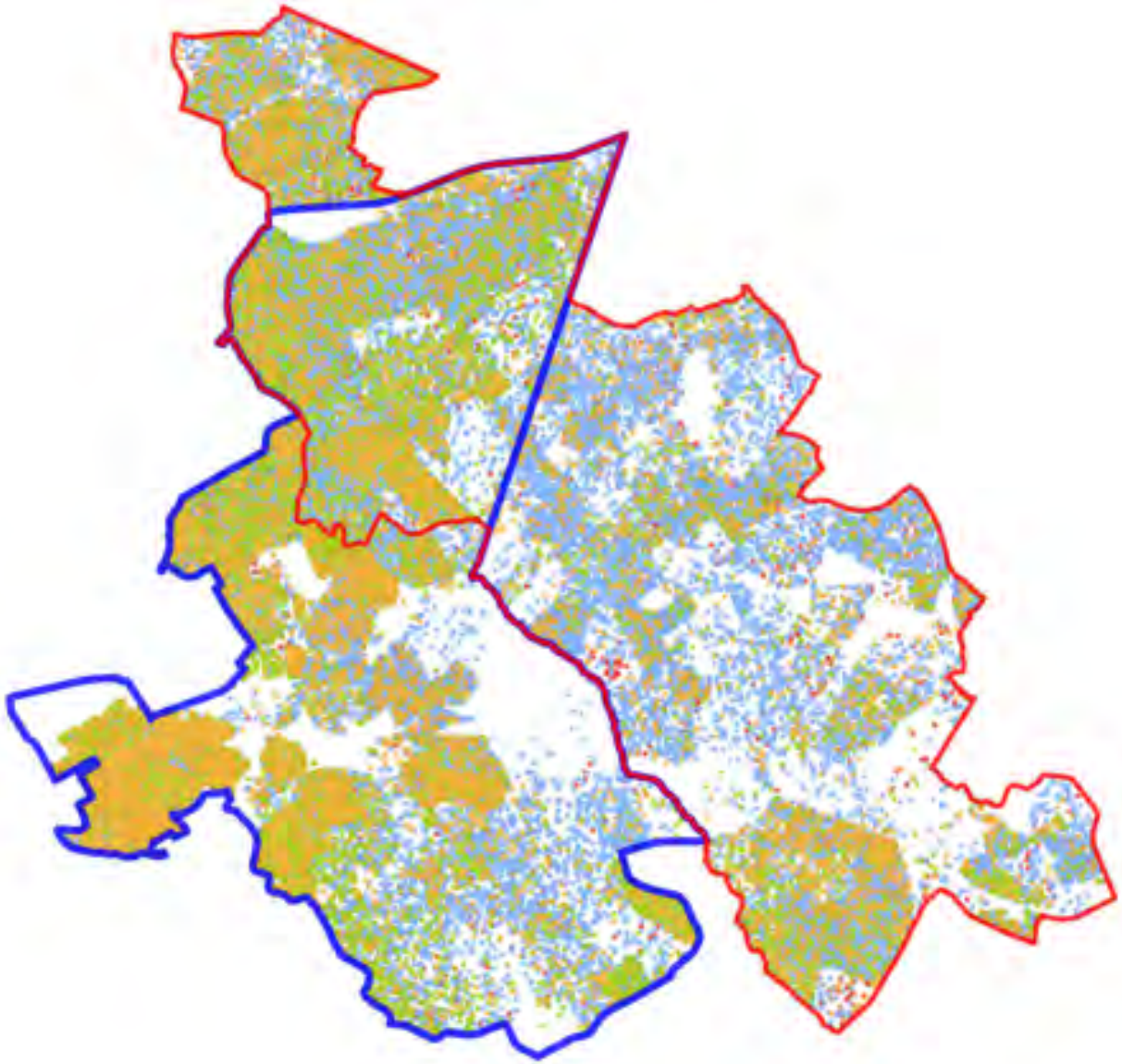


EXHIBIT
13

Asian White Black Latino = 1 person

HD 44

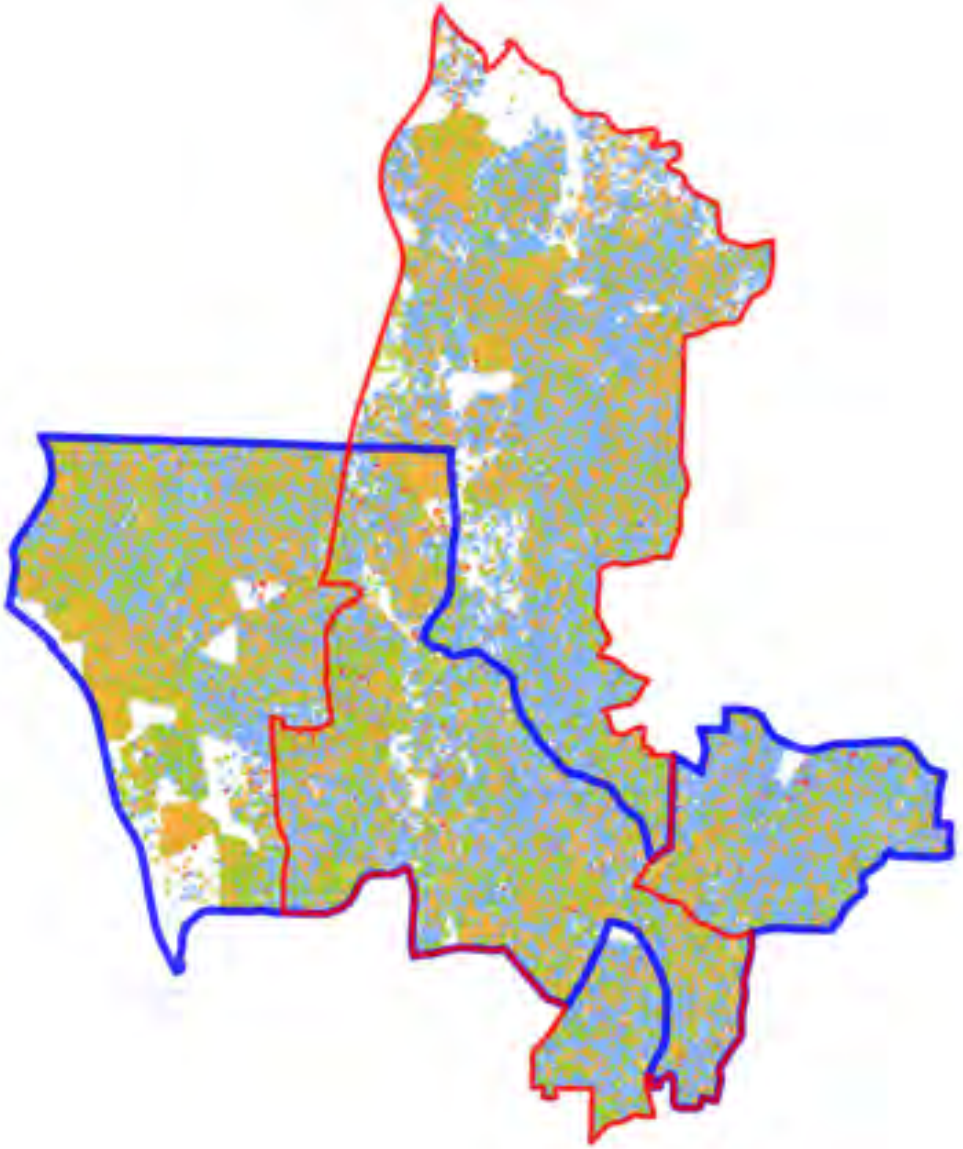


EXHIBIT
14

Asian White Black Latino = 1 person