

# EXHIBIT 3

## **Supplemental Expert Report of Dr. Maxwell Palmer**

*Pendergrass v. Raffensperger* (N.D. Ga.)

December 22, 2022

  
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## **SUPPLEMENTAL EXPERT REPORT OF MAXWELL PALMER, PH.D.**

I, Dr. Maxwell Palmer, declare as follows:

1. In my original report in this matter I examined racially polarized voting in Northwest Georgia. I analyzed statewide elections across five congressional districts (the 3rd, 6th, 11th, 13th, and 14th Districts) and found high levels of racially polarized voting across the focus area as a whole and each individual district.
2. I have been asked to supplement my original report by analyzing the congressional election results within each of these five districts in the 2022 general election. These elections are commonly referred to as “endogenous elections.”
3. In this supplemental report I rely on the same data (precinct-level election results and precinct-level voter turnout by race) as in my original report. I use the same methodology (ecological inference) to perform my analysis.
4. I find strong evidence of racially polarized voting across each of the five congressional districts in the focus area. Black and White voters supported different candidates in all five districts. Black-preferred candidates for Congress were defeated in the 3rd, 6th, 11th, and 14th Congressional Districts, and won election only in the majority-Black 13th Congressional District.
5. Figure 1 presents the estimates of support for the Black-preferred candidate for Black and White voters for each congressional election in 2022. Full results for each election are presented in Table 1. Figure 1 shows that the estimates for support for Black-preferred candidates by Black voters are all significantly above 50%. Black voters are extremely cohesive, with a clear candidate of choice in all five districts. White voters are highly cohesive in voting in *opposition* to the Black-preferred candidate in every district.

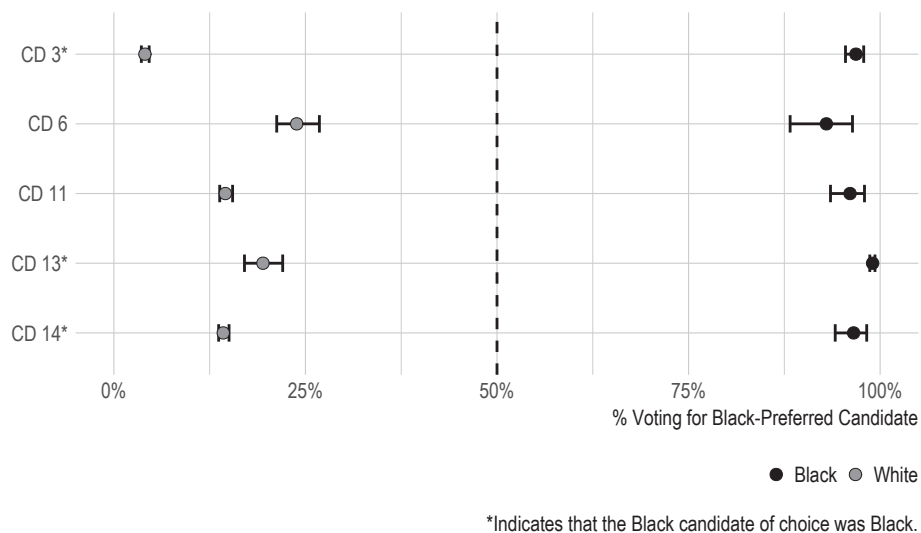


Figure 1: Racially Polarized Voting Estimates by Congressional District

Table 1: Ecological Inference Results

District	Black	White	Other
CD 3*	96.8% (95.5, 97.9)	4.1% (3.6, 4.6)	92.3% (89.2, 94.8)
CD 6	93.0% (88.3, 96.4)	23.9% (21.3, 26.8)	65.6% (55.9, 74.0)
CD 11	96.1% (93.5, 98.0)	14.5% (13.8, 15.5)	94.4% (90.9, 97.0)
CD 13*	99.0% (98.7, 99.3)	19.5% (17.0, 22.0)	88.9% (85.6, 92.1)
CD 14*	96.5% (94.1, 98.2)	14.3% (13.7, 15.0)	93.9% (89.6, 96.9)

\* Indicates that the Black candidate of choice was Black.

Table 2: Congressional Candidates and Election Results

District	Dem. Candidate	Dem. Cand. Race	Dem. %	Rep. Candidate	Rep. Cand. Race	Rep. %
CD 3	Val Almonord	Black	31.3%	Drew Ferguson	White	68.7%
CD 6	Bob Christian	White	37.8%	Rich McCormick	White	62.2%
CD 11	Antonio Daza	Latino	37.4%	Barry Loudermilk	White	62.6%
CD 13	David Scott	Black	81.8%	Caesar Gonzales	Latino	18.2%
CD 14	Marcus Flowers	Black	34.1%	Marjorie Taylor Greene	White	65.9%