

Pendergrass, Coakley, et al. v. Raffensperger, Brad, Et Al.

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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4

5 COAKLEY PENDERGRASS, ET AL.,)
6 PLAINTIFFS,) CIVIL ACTION NO.
7 v.) 1:21-CV-05339-SCJ
8 BRAD RAFFENSPERGER, ET AL.,)
9 DEFENDANTS.)

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11
12
13 DEPOSITION OF WILLIAM S. COOPER
14 (TAKEN by DEFENDANTS)
15 ATTENDING VIA ZOOM IN BRISTOL, VIRGINIA
16 FEBRUARY 14, 2023
17
18
19

20 REPORTED BY: Meredith R. Schramek
21 Registered Professional Reporter
22 Notary Public
23 (Via Zoom in Mecklenburg County,
24 North Carolina)
25

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A P P E A R A N C E S

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Deposition of William S. Cooper, taken by the
defendants via Zoom on the 14th day of February, 2023,
at 10:46 a.m., before Meredith R. Schramek, RPR, Notary
Public.

C O N T E N T S

The Witness: WILLIAM S. COOPER

Examination By Mr. Tyson4

Examination By Ms. Khanna101

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P R O C E E D I N G S

WILLIAM S. COOPER,

having been duly sworn,

was examined and testified as follows:

EXAMINATION BY COUNSEL FOR DEFENDANTS

BY MR. TYSON:

Q All right. Well, good morning, Mr. Cooper. It's good to see you again. I know we know each other. I'm Bryan Tyson. I represent the Secretary and the state election board defendants in this case.

We're going to be the taking your deposition this morning for purposes of discovery and all purposes allowed under the Federal Rules of Civil Procedure and Evidence.

And so you've been sworn in. So you'll be testifying under oath today. I'll just recap for us very briefly kind of what the rules of the road are.

So in terms of the deposition, I'd say the main piece that makes it more challenging virtually is not talking over each other to make it easy for Meredith, our court reporter, to be able to get both sides of the conversation.

So I'm going to do my best to ask my question, pause, and let you answer.

Will that work for you?

1 A I will do my best.

2 Q Okay. All righty.

3 And like we do in person, if you need a break
4 at any point, just let us know. I just ask that you
5 not take a break while there's a question pending. And
6 then also I know we're going to be talking through a
7 lot of map-related things so if I ask you a question
8 and you don't understand, I'd like you to go ahead and
9 let me know that. And if you answer the question, I'll
10 assume you do understand the question.

11 Does that work for you?

12 A That's fine.

13 Q Okay. So just for purposes of completeness,
14 some of the things we'll cover will be similar to what
15 we covered last week in the Alpha Phi Alpha case.

16 But I want to just go ahead and begin with
17 some background information. So for purposes of this
18 deposition, can you state your full name for the
19 record?

20 A My name is William Sexton Cooper.

21 Q And, Mr. Cooper, do you have any medical
22 condition or are you on any medication that would keep
23 you from testifying fully and truthfully today?

24 A No.

25 Q All right. So let's talk about what you did

1 to get ready for your deposition today.

2 Can you walk me through kind of what your
3 process was to prepare for today's deposition?

4 A Well, pretty straightforward. I just read my
5 declaration and reviewed Mr. Morgan's response and
6 looked back through the exhibits and my previous
7 declaration. And I also reviewed the text of the
8 testimony in February of 2021 -- '22. Excuse me.

9 Q And that would be the preliminary injunction
10 proceedings in this case?

11 A Yes.

12 Q Did you meet with anybody to get ready for
13 your deposition today?

14 A I spoke briefly with Abha and Jonathan
15 Hawley.

16 Q All right. Did you discuss your deposition
17 with anybody else besides Ms. Khanna and Mr. Hawley?

18 A No.

19 Q All right. So we've been through your
20 employment history on a variety of places and I know
21 you've been an expert in a lot of different cases. So
22 we're not going to try to get through those.

23 I just wanted to ask about the congressional
24 maps for Georgia. How many times have you drawn
25 congressional district maps for the State of Georgia

1 over your time as a map drawer?

2 A Well, I was involved in the case that was
3 filed I think in 2018. I don't remember the title.
4 But it focused on the plan as drawn in 2012.

5 Prior to that, as a consultant, I worked on a
6 congressional plan -- actually, you know, I think last
7 week we spoke about my work for a law firm in Atlanta
8 that did not materialize in terms of litigation. I
9 believe that was mainly restricted to House and Senate.
10 I don't think I did anything on the congressional plan
11 for that law firm.

12 So it was just the -- is it Dwight v Kemp,
13 was that the case? Or am I confusing that with the
14 House case? In any event, that's the case I worked on.

15 And at some point in like 1996 or 1997, I
16 briefly worked on something involving the congressional
17 plan that was seemingly in constant litigation there in
18 the '90s for the ACLU southern regional office, and I
19 believe I filed a very brief declaration. I have no
20 recollection as to exactly what that declaration
21 included but it would have been very short.

22 Q Yeah. The '90s cycle was certainly long in
23 terms of litigation timeline for all of us.

24 A And I had no involvement in congressional
25 district drawing in Georgia as far as I can recall till

1 '96 or '97, when what was sort of the tail end, I
2 think, of all that litigation.

3 Q Zooming out from Georgia to other states as
4 well, have any -- has any state ever used a
5 congressional district map that you drew in an actual
6 election?

7 A No. I've done a little bit of consultant --
8 consulting with respect to congressional plans, but
9 it's always been as part of litigation, and usually the
10 state gets the final word on that.

11 Q So let's talk a little bit more about this
12 case.

13 I know we talked about how you got involved
14 in the Alpha case last week. When did you first hear
15 about or hear from somebody about the Pendergrass case?

16 A Well, it would have been in the fall of 2021
17 after the release of the census data.

18 Q Do you recall if it was before the General
19 Assembly's special session in November of 2021?

20 A It would have been about the same time. I
21 don't think I did anything on a congressional plan
22 after the release of the 2020 census until sometime
23 probably in late November.

24 Q And I'm not asking for what you talked about,
25 but do you remember who contacted you about getting

1 involved in this case?

2 A I believe it would have been Abha Khanna but
3 it could have been Jonathan Hawley or both.

4 Q Okay. Makes sense. And, again, not asking
5 what you were told, just asking were you told what the
6 plaintiffs wanted to prove or what their position was
7 going to be on this case?

8 MS. KHANNA: Objection. Calls for
9 attorney-client communications basically asking a
10 yes-or-no question about what he was told by counsel.

11 MR. TYSON: Okay.

12 MS. KHANNA: So I'm going to instruct him not
13 to --

14 MR. TYSON: Are you going --

15 MS. KHANNA: Yeah. Sorry.

16 Bill, I'm going to instruct you not to answer
17 that.

18 BY MR. TYSON:

19 Q Okay. Mr. Cooper, again, not asking what you
20 were told, but were you told what you were being hired
21 for in this case in that first conversation with
22 Ms. Khanna and Mr. Hawley?

23 A Yes. It was to work on the congressional
24 plan for the state of Georgia.

25 Q And you're being paid \$150 an hour for your

1 services in this case?

2 A Yes.

3 Q And that's the same rate that you're being
4 paid in other cases involving redistricting in the 2020
5 cycle; is that right?

6 A That's right. Except for the reduction -- I
7 think I mentioned last week that I cut my fee to \$125
8 for San Juan County, Utah, because I like it out there.

9 Q Yes. I recall us talking about that.

10 And just so the record is clear, you don't
11 offer a discount for any other litigation work that you
12 do based on how much you like a particular
13 jurisdiction; right?

14 A Well, I charged maybe as little as a hundred
15 dollars an hour for San Juan County when I started that
16 litigation, which would have been like in 2012 or 2013.
17 So there's been a little inflation and it may have been
18 a 125. I don't specifically recall.

19 Q Okay. So exempting San Juan County, you
20 don't have a discounted rate for anybody else that you
21 provide litigation services to?

22 A No. For redistricting cases, I think it's
23 been pretty much straight up 150 ever since the release
24 of the 2020 census.

25 Q And do you recall approximately how much

1 you've been paid for this case so far?

2 A Not specifically. I think it might have been
3 \$12,000 or so because it's such a simple,
4 straightforward case.

5 Q And I'm assuming you send your bills to
6 Ms. Khanna and Mr. Hawley and their firm?

7 A I do.

8 Q All right. So we're going to get your
9 reports here in a minute. But I just want to ask
10 before we get to that: Did plaintiffs' counsel provide
11 you with any facts or data that is not listed in your
12 expert reports that you relied on in forming your
13 opinions in this case?

14 A I think at some point in November I may have
15 received some information about where incumbents lived,
16 but -- because this is a congressional plan where
17 incumbency is not a requirement, you want to find a
18 district that didn't really play a very significant
19 role in the plan I produced.

20 Q Okay. So with the exception of incumbent
21 data, which -- well, let me ask this: As you
22 indicated, in a congressional case, it doesn't matter
23 where an incumbent lives. They can run for any
24 district in the state; right?

25 A Right. That's my understanding.

1 Q Okay. So it's fair to say you didn't, then,
2 rely on incumbent data when drafting your illustrative
3 plan in this case?

4 A I believe I did --

5 MS. KHANNA: Objection.

6 THE WITNESS: Well, I don't think I really
7 closely followed the incumbent residences when I was
8 drawing the plan, but I believe I did -- I may have had
9 those residences.

10 BY MR. TYSON:

11 Q Okay. So besides the --

12 A I think that was on a -- I don't think that
13 officially came from the State.

14 Q Understood. So aside from incumbent data, is
15 there any other data or facts that you relied on in
16 forming your opinions that is not listed in your
17 reports?

18 A I don't believe so.

19 Q And did plaintiffs' counsel ask you to assume
20 anything that you relied on when you were forming your
21 opinions in this case?

22 A No.

23 Q And I'm assuming you've never attended any
24 meetings about this case with any of the plaintiffs
25 that are involved in it; right?

1 A I have not.

2 Q And have you ever talked to any of the
3 plaintiffs in this case?

4 A Not to my knowledge.

5 Q And am I correct that following the release
6 of the 2020 census data, the only Georgia maps that
7 you've drawn are the maps in the Alpha Phi Alpha case
8 and the maps you've submitted in this case; is that
9 right?

10 A Legislative plans. I have some drawn some
11 local plans -- very few. Fayette County, I think I may
12 have mentioned that in the previous deposition. And
13 that may be it. It's been a quiet period at the local
14 level for me in Georgia.

15 Q And I apologize. I meant to say statewide.
16 So that takes care of that in terms of local.

17 So in terms of the maps that you've drawn in
18 this case, you don't have anybody else working with you
19 in the drawing of the maps. You've drawn all the maps
20 yourself; right?

21 A Right.

22 Q And by my count, you've drawn a total of two
23 illustrative congressional plans, one that was
24 submitted as part of your report in the preliminary
25 injunction proceeding, and the other that was in your

1 expert report submitted on December 5th; is that right?

2 A Yes.

3 Q When you were drawing both the illustrative
4 plan for the preliminary injunction hearing and the
5 illustrative plan in your 12/5 report, it would be fair
6 to say your goal was to add a majority black
7 congressional district above the number drawn by the
8 General Assembly; is that right?

9 A No, that was not my goal. My goal was to
10 determine whether it was possible while, at the same
11 time, to include traditional redistricting principles.

12 Q Did you attempt to draw more than one
13 additional congressional map? I mean -- I'm sorry.
14 Let me start that over again.

15 Did you attempt to draw more than one
16 additional majority black district as part of your
17 analysis of Georgia's congressional plan?

18 MS. KHANNA: I'm going to object to the
19 extent that this calls for discussion of any draft
20 reports or draft maps which are protected under the
21 federal rules.

22 So, Bill, I'll instruct you not to answer to
23 the extent it would discuss any of the draft reports or
24 draft maps, but you can answer otherwise if you can.

25 THE WITNESS: Okay. Well, I did not attempt

1 to draw two additional majority black districts.

2 Does that answer the question?

3 BY MR. TYSON:

4 Q Yes, that does. Thank you.

5 Now, in preparing -- or I should ask this:

6 Do you know what principles the Georgia Legislature
7 used for the drawing of its congressional plans?

8 A Well, I've seen a -- there's a document
9 that's posted on the General Assembly's website that
10 identifies the factors to take into consideration. I
11 submit for both House, Senate, and congressional plans.

12 Q Did you rely on that document about the
13 principles for drawing plans when creating your
14 illustrative plans in this case?

15 A Yes. That document is pretty straightforward
16 and typical guidelines that any state would issue.

17 Q So it's typical guidelines and guidelines
18 that you relied on when preparing your illustrative
19 plans?

20 A I believe so.

21 Q All right. So, Mr. Cooper, I know we had a
22 discussion about terminology last week, but I just want
23 to for the purposes of this deposition also just kind
24 of make sure we're all clear in our definitions.

25 Do you use the term "majority black district"

1 in your drawing processes and reports?

2 A I do.

3 Q And what is your definition of a majority
4 black district?

5 A Typically, it would be majority black voting
6 age. In some circumstances, it might be majority black
7 citizen voting age according to the 2020 census for
8 majority black voting age.

9 And then if you're looking at citizen voting
10 age, it would vary over time as the American Community
11 Surveys results are released on an annual basis. So
12 over the course of a decade, that number would
13 change -- citizenship number.

14 Q And then would you distinguish a majority
15 black district from a majority minority district?

16 A Yes, I would. A majority black district
17 would be a district that is over 50 percent majority
18 any part black. And a majority minority district would
19 be a district that is over 50 percent nonwhite or not
20 non-Hispanic white.

21 Q So a majority minority district may include a
22 variety of different minority groups, but the total of
23 the various minority groups would be over 50 percent?

24 A Yes.

25 Q Have you used the term "majority opportunity

1 district" in your districting work?

2 A I probably have used the term and maybe even
3 in some of my declarations, but I'm not a Cumulus 2 or
4 Cumulus 3 expert. So it would be sort of a generic
5 reference and not based on statistical analysis.

6 Q Have you used the term "coalition district"
7 in your work at different points?

8 A In a select few cases involving more than one
9 minority, for example, in Gwinnett County, the case I
10 was involved in that I think you're aware of. In that
11 particular case, there was a coalition of plaintiffs
12 that were African-American, Latino and Asian-American.
13 So that was a coalition district. And I've used it in
14 other cases I think. That's the most immediate one
15 that comes to mind that's directly related to Georgia.

16 Q Is there a difference between a majority
17 minority district and a coalition district in your
18 mind?

19 A There could be because you could have a wide
20 range of ethnicities and races but be focusing on just
21 two or three.

22 For example, in Gwinnett County, there are
23 probably members of a minority group that would be
24 indigenous or of some other ethnicity that wouldn't
25 necessarily fit into the three-part coalition of

1 Asian-American, African-American, or Latino.

2 Q So a majority minority district would include
3 kind of all coalition districts, but not all coalition
4 districts are majority minority districts?

5 A Well, in a Section 2 case, a coalition
6 district would, by definition, be a -- have to be a
7 majority to constitute a single district that would be
8 an additional district. But you could have situations
9 where there is a minority population but is so diverse
10 that you really couldn't apply Gingles 1 to that
11 particular instance because no minority or coalition of
12 minorities would be over 50 percent. It would just be
13 the entire minority class. And I suppose in some
14 circumstances, you could identify the entire minority
15 class as being a Gingles 1 class, but I've not
16 really -- I don't really recall being in a case like
17 that.

18 Q So I'd like to ask you just your views -- are
19 you familiar with the term "racial predominance" in the
20 drawing of a plan?

21 A Yes. I've heard the term used.

22 Q Does race predominate in the drawing of a
23 district plan if the map drawer's goal is to draw the
24 maximum number of majority black districts?

25 MS. KHANNA: Objection. Calls for a legal

1 conclusion.

2 BY MR. TYSON:

3 Q You can answer --

4 MS. KHANNA: You can answer.

5 THE WITNESS: Well, I mean, if the goal is to
6 draw the maximum number possible, then it would
7 certainly be high priority. When I draw plans, I'm
8 always trying to balance traditional redistricting
9 principles. So I would never have that as a goal
10 unless it was just some sort of hypothetical example to
11 show what could be drawn, perhaps even showing that
12 well, it could be drawn, but it would violate
13 traditional redistricting principles.

14 BY MR. TYSON:

15 Q So it's fair to say when you're drawing a
16 map, you're taking into account a variety of different
17 considerations at any given point; right?

18 A Absolutely. Yes.

19 Q Do you know, Mr. Cooper, currently how many
20 black members of Congress are elected from Georgia?

21 A I believe that currently there are five.

22 Q All right. Well, let's turn to your report.
23 Do you have a copy there in front of you? Or would it
24 help you if I shared it on the screen?

25 A I do have a copy of my report. You may wish

1 to point out some portion of that report. So feel free
2 to do so.

3 (Exhibit 1 Marked for Identification.)

4 BY MR. TYSON:

5 Q I'm going to try to walk methodically through
6 the report. So just try to work our way along. We'll
7 have a couple of different places where we'll jump out
8 of the report and back in.

9 First, I just wanted to ask as a general
10 matter -- we'll mark this as Exhibit Number 1, your
11 December 5th report.

12 Approximately how long did it take you to
13 prepare this report? Do you remember?

14 A Well, I started sometime around the middle of
15 November, were working on another plan, a new plan, and
16 I finished of the 5th of December. I was doing other
17 things over that time period. So it was not
18 exclusively this particular lawsuit.

19 Q So then, the time period where you were
20 drawing the illustrative plan in your December 5th
21 report and creating this report was roughly the middle
22 of November 2022 through December 5, 2022?

23 A That is correct.

24 Q So turning to paragraph Number 10 in your
25 report on page 4, do you see that?

1 A Yes.

2 Q And you say in paragraph 10: "The black
3 population in metropolitan Atlanta is sufficiently
4 numerous and geographically compact to allow for the
5 creation of an additional majority black congressional
6 district anchored in Cobb, Douglas, and Fulton Counties
7 (CD6 in the illustrative plan) consistent with
8 traditional redistricting principles"; right?

9 A Right.

10 Q Are you offering any other expert opinions in
11 this report that are beyond what you've stated in
12 paragraph 10 of this report?

13 A I don't think so. For background
14 information, I've included a lot of socioeconomic data
15 from the 2021 ACS, but I think for Senate Factor 5,
16 someone else may be doing that.

17 I've been relying on socioeconomic data and
18 aware of the socioeconomic data of places where I'm
19 drawing plans really going all the way back to my
20 initial efforts in the late '80s. I would get the data
21 at the library of Virginia Commonwealth University and
22 photocopy it. Those were the days.

23 Q Understood.

24 And setting aside the situation where there's
25 new facts -- so I want to set that to the side -- are

1 you offering any other opinions in this case that are
2 not contained in your report or do you plan to offer
3 any opinions in this case that are not contained in
4 your report?

5 A I do not plan to.

6 Q And to be clear, all the opinions you're
7 offering in this case are contained in your
8 December 5th report, Exhibit 1; right?

9 A As best I understand. I suppose I have
10 the -- would have the option of filing some other
11 declaration or something in response to something, but
12 that's not my plan.

13 Q Thank you. So backtracking just a hair to
14 paragraph Number 8, you were asked to determine whether
15 the African-American population in Georgia was
16 sufficiently large and geographically compact to allow
17 for the creation of an additional majority black
18 congressional district in the Atlanta metropolitan
19 area; right?

20 A Correct.

21 Q And you determined the answer to that
22 question was yes?

23 A Unquestionably, yes.

24 Q So can you just generally describe for me the
25 methodology that you used to determine whether Gingles

1 Prong 1 is met on the congressional plan?

2 A Well, I rely on software called Maptitude for
3 Redistricting which allows you look at a jurisdiction,
4 whether it be a city or a state, and analyze the
5 underlying demographics at the county level and then at
6 the subcounty level.

7 And so I used the census data and my previous
8 knowledge from the preliminary injunction hearing and
9 the 2018 White v Kemp case and other local work I've
10 been doing in Georgia, and that helped me know at the
11 outset that there was a pretty good chance that one
12 could draw an additional majority black district.

13 Of course, from the preliminary injunction --
14 going into this latest declaration, I argue that to be
15 a fact. Now I just made some minor changes. But other
16 than that, it's similar to the plan I produced for the
17 preliminary injunction.

18 Q So kind of breaking down that process, I know
19 you said you have a lot of background knowledge about
20 Georgia. And that includes racial demographics and
21 where people live in Georgia; is that right?

22 A Yes. I've worked on a lot of local plans
23 over the years and seen the population change over the
24 years. So I don't live in Georgia, but it's not a
25 foreign territory.

1 Q And so you have your local -- your kind of
2 background knowledge that you bring, and then you said
3 you look at both census information at the county level
4 and the subcounty level.

5 How do you go about looking at census
6 information at the county level and subcounty level?

7 A Well, you can display on a computer screen as
8 you're drawing a redistricting plan the demographics of
9 a city or a precinct or block group or a census block.
10 So all of that information is available as one is
11 putting together a plan.

12 Q And while you were working on the
13 illustrative plans you created in this case, were you
14 displaying racial demographic information on the screen
15 at any point?

16 A Sometimes I had demographic information
17 displayed, either through the data view that is part of
18 the Maptitude software indicating what the population
19 is in a particular district and break out the race of
20 the component parts.

21 So I had that. And I also had precinct
22 lines. So I was able to identify precincts that had
23 significant black populations.

24 I think I mentioned in my last testimony that
25 I used sometimes little dots showing where the minority

1 population is concentrated. So I was aware of that.
2 And, really, based on previous knowledge, in some of
3 these counties like particularly Fayette County and
4 others, Gwinnett, I kind of had been through those
5 areas and so understood basically where the population
6 is even before beginning the plan.

7 Q And do you have any political data in your
8 Maptitude system or is it only racial information from
9 the Census Bureau?

10 A It's racial information along with, of
11 course, breakouts by age and ethnicity and also
12 socioeconomic data is available.

13 Q So in paragraph 10, you find you can create
14 this additional majority black congressional district,
15 and you use the term "consistent with traditional
16 redistricting principles."

17 What does the phrase "consistent with
18 traditional redistricting principles" mean?

19 A Well, it just means that it's possible to
20 draw a plan that adheres to traditional redistricting
21 plans. In other words, the districts within a plan
22 should be, for a congressional plan, perfectly equal in
23 terms of total population plus or minus zero.

24 It means that one should be aware of
25 political subdivision boundaries, respect communities

1 of interest and historical and cultural commonalities
2 or differences. I'm probably leaving something out
3 here, but those would be the primary factors.

4 Q So in terms of how you determine if a
5 particular district or plan is consistent with
6 traditional redistricting principles, do you use any
7 particular metrics to measure that consistency or
8 adherence to those principles?

9 A Yes. And so you signaled one thing that I
10 did not mention. The districts within the plan should
11 be reasonably compact and reasonably shaped. And there
12 is a way to measure that using modules in Maptitude for
13 Redistricting. That will give you a score as to what
14 the compactness may be.

15 I typically use the Reock and Polsby-Popper,
16 the two most widely referenced compactness scores, but
17 there are others. And also you can just look at the
18 plan and look at the districts and see if they seem
19 more reasonable. And I think the districts I've drawn
20 are reasonably shaped for that without going to the
21 next step of examining the Reock and Polsby-Popper
22 scores. And if you do examine the Reock and
23 Polsby-Popper score, you'll see the plan that I've
24 drawn is essentially equivalent in terms of the scores
25 for the enacted plan.

1 Q So I want to talk through some of those
2 particular principles. You mentioned population
3 equality. And under a congressional plan, I'm assuming
4 you would determine that a plan was consistent with a
5 traditional principle of population equality because it
6 was plus or minus zero, as you indicated?

7 A Yes. Apparently that's, in a lot of states,
8 a requirement. That -- and I think in the Georgia
9 website, there's the requirement that it be plus or
10 minus one person. If I'm not mistaken, it's actually
11 stipulated.

12 Some other states have a slightly less
13 restrictive definition. Arkansas seems to allow plus
14 or minus 500 people.

15 Q And then you mentioned the traditional
16 principle of keeping political subdivisions whole.

17 How do you determine if a plan is consistent
18 with the traditional principle of keeping political
19 subdivisions whole?

20 A Well, you can tally the number of
21 subdivisions that have been flipped, whether it be a
22 municipality or a precinct or a county. So that's
23 quantifiable. But there's no -- there's no hard, set
24 number in terms of what's acceptable or what's not
25 acceptable.

1 Q So if a plan split fewer counties than your
2 illustrative plan, you wouldn't say that your
3 illustrative plan was inconsistent with the principle
4 of keeping jurisdictions whole?

5 A No. Because you're constantly balancing
6 things.

7 Q And so there's -- for Georgia, there's no
8 objective number of county splits that makes a plan
9 consistent with the traditional principle of keeping
10 counties whole; is that right?

11 A Well, ultimately, there would be. But I --
12 you know, it's difficult to give you a number because
13 there are some very small counties and some large
14 counties and so it could vary. And -- so I'm unable to
15 tell you exactly what the threshold would be.

16 I've -- in the latest plan, the plan that's
17 part of my November 2020 -- December 2022 declaration,
18 I've split one fewer county -- or one less county. And
19 there are, I think, 18 county splits total compared to
20 21 in the state plan.

21 So I assume that's sufficient since I've
22 been -- done better than the State did in that respect.

23 Q But you wouldn't say that the State's plan
24 was inconsistent with the traditional principle of
25 keeping counties whole just because your plan splits

1 one fewer, would you?

2 A No.

3 Q On that --

4 A Just looking at -- from the perspective of
5 splits of political subdivisions, no.

6 Q Okay. You mentioned the compactness scores
7 and the compactness of the districts.

8 How do you determine that a plan is
9 consistent with the traditional redistricting principle
10 of compactness?

11 A Well, that's very tricky because states and
12 towns and precincts can have odd shapes and so that
13 would vary from state to state and district to
14 district. A coastal district, for example, might score
15 very low on Polsby-Popper because of all the ins and
16 outs of a coastline or a river.

17 So it's a very -- it seems to be an objective
18 score, but it ends up being so much subjective in terms
19 of how you interpret it. But I don't think there's any
20 question that the illustrative plan I've drawn is
21 acceptable in terms of compactness based on the Reock
22 and Polsby-Popper scores.

23 Q Is there a range for the Reock and
24 Polsby-Popper scores that is unacceptable for
25 compactness?

1 A There is not necessarily. I do think that at
2 some point, at least in terms of drawing districts that
3 are not affected by a coastline or a municipal boundary
4 or some other potential subdivision like a precinct,
5 that once you get into the low single digits, become
6 somewhat problematic.

7 But you can have situations like, say, the
8 infamous "snake on the lake" in Ohio that stretches --
9 it was the old snake on the lake that went from
10 downtown Cleveland all the way to Toledo, a narrow
11 strip of land along the lake. It actually had a very
12 high Polsby-Popper score, and that was, of course, very
13 misleading and that was because it had precincts that
14 extended out into Lake Erie because a couple of those
15 islands in the lake are populated. So that "snake on
16 the lake" congressional district had a reasonably high
17 compactness score even though it was not at all
18 compact.

19 Q Do you use or display the Reock and
20 Polsby-Popper scores on the screen as you're drawing a
21 plan, or do you just check them once the plan is
22 complete?

23 A I will look at them occasionally, but I don't
24 routinely check them. The latest version of Maptitude
25 does allow you to do that from the data view, but I

1 basically just ignore that until I'm interested.

2 Q So within Maptitude, you don't use the
3 display of the compactness score as you're drawing?
4 You have to stop and run a report to see that
5 information?

6 A Well, it's there. But normally I would just
7 run the report because I use just visual assessments
8 basically as I'm drawing a plan so that I would
9 hopefully check it if I thought the plan was starting
10 to look a little strange. So needless to say, with
11 respect to this congressional plan, I never checked it
12 because it looks good from the start.

13 Q And I believe we discussed the traditional
14 redistricting principle of incumbency doesn't really
15 apply on a congressional plan because incumbents can
16 live anywhere in the state; right?

17 A That's my understanding.

18 Q And so when you say in paragraph 10 that this
19 district is "consistent with traditional redistricting
20 principles," the new district, are you saying anything
21 beyond it splits a similar number of counties, it has a
22 similar compactness score, and its equal population to
23 other districts in the state?

24 A Well, as I've mentioned, one must factor
25 in -- I mean, again, this is very subjective --

1 cultural and historical information and, above all, of
2 course, one must take into account minority voting
3 strengths and whether or not the plan is, you know, not
4 protecting minorities under Section 2.

5 Q Okay. So you referenced historical and
6 cultural connections. Do I have that right?

7 A Yes, generally speaking.

8 Q Okay. How do you determine if a plan is
9 consistent with the traditional principle of historical
10 and cultural connections?

11 A It's subjective. I mean, it's a community of
12 interest, which is entirely subjective. I think I've
13 likened it to pinning Jell-O to a wall because everyone
14 can have a different definition.

15 Q So your determination that your plan complies
16 with the traditional principle of maintaining
17 historical and cultural connections is just your view
18 and there's not a specific definition for how that
19 complies?

20 A I don't think there would be a specific
21 definition, no. It's very general. And different
22 people can come to different conclusions, obviously.

23 Q You also referenced minority voting strength
24 as a traditional redistricting principle.

25 How do you go about determining that the

1 illustrative plan complies with the traditional
2 principle of maintaining minority voting strength?

3 A Or not diluting minority voting strengths?

4 Q Or not diluting.

5 A Well, to a large degree, I would rely on the
6 attorneys' interpretation of the statistical work done
7 by the individual who's working on the Gingles 2 and
8 Gingles 3 analysis, expert analysis.

9 Q So as a map drawer, are there any steps you
10 take apart from reliance on the attorneys for
11 maintaining the traditional principle of not diluting
12 minority voting strength?

13 A Well, I mean, just my general background
14 depending on the circumstances. I mean, in Georgia I
15 know, for example, that there are two districts that
16 are actually slightly under 50 percent black voting age
17 population, District 2 and District 5. So it would
18 appear in Metro Atlanta, a district that is around
19 50 percent black is a competitive district that could
20 be a so-called minority opportunity district. That
21 might not be the case in the delta of Mississippi, but
22 it just depends.

23 Q And specifically for District 6 -- again, not
24 asking for anything that you relied on the lawyers for
25 in this case, but as a map drawer, did you determine

1 that the dilution of minority voting strength was met
2 as a traditional principle because District 6 was over
3 50 percent?

4 A Well, yes. It's over 50 percent. And so for
5 that reason, along with evidence that minorities have
6 been elected even in districts that are under
7 50 percent, I reached that conclusion, which was
8 confirmed, I suppose, in the Gingles 2 and Gingles 3
9 analysis in this case.

10 Q So, again, kind of getting back to your
11 conclusion that the new CD 6 is drawn consistent with
12 traditional redistricting principles, what you mean by
13 the phrase "consistent with traditional redistricting
14 principles" is that it meets population equality by
15 being plus or minus zero, it splits a number of
16 counties and precincts similar to the enacted plan, the
17 compactness scores are similar to the enacted plan, in
18 your opinion, historical and cultural connections are
19 maintained, and the district is over 50 percent black
20 VAP.

21 Is there anything else that is included in
22 the phrase "consistent with traditional redistricting
23 principles" in paragraph 10?

24 A Well, reasonably shaped and compact. I don't
25 think you mentioned that. And the district should be

1 contiguous unless the jurisdiction in question is not
2 contiguous. So those are other factors that I took
3 into consideration.

4 Q On any other factors that you took into
5 consideration that we've not talked about that are
6 included in that phrase "consistent with traditional
7 redistricting principles"?

8 A I think we've covered them, but I reserve the
9 right to interject another one if I suddenly think that
10 maybe we didn't.

11 Q Understood. But as of right now, you can't
12 think of another one; is that right?

13 A As of right now, I don't have any other one
14 top of mind.

15 Q Let's go next to paragraph 11 of your report.
16 And you reference that you don't change districts -- 6
17 of the 14 districts on the enacted 2021 plan; correct?

18 A Correct.

19 Q And so in order to draw the new majority
20 black Congressional District 6, you've had to change,
21 on the illustrative plan, 8 of the 14 districts from
22 the enacted plan; right?

23 A I don't know if I had to change eight, but --
24 I suppose it's possible I could have changed fewer than
25 eight. I don't know.

1 Q Okay. But on the illustrative plan that
2 you've presented in this case, you've changed 8 of the
3 14 districts from the enacted plan; right?

4 A Yes.

5 Q And looking at the districts that you did not
6 change, Congressional District 2 currently elects a
7 black democratic member of Congress; right?

8 A Correct.

9 Q And Congressional District 5 currently elects
10 a black democratic member of Congress; right?

11 A Correct.

12 Q And Congressional District 7 currently elects
13 a black democratic member of Congress; right?

14 A Correct.

15 Q And I believe we covered this a little
16 earlier, but there are some changes between the plan in
17 your 12/5 report and the report that you offered in the
18 preliminary injunction hearing; right?

19 A Correct.

20 Q So let's look next to the demographic profile
21 portion of your report. And maybe to make this a
22 little bit easier, Mr. Cooper, did you present the same
23 census information in this report, really from
24 paragraph 13 through paragraph 37, that you presented
25 in the Alpha Phi Alpha report minus the non-Metro

1 Atlanta regions.

2 A Probably. I cannot guarantee it. There
3 could be a typo or something else that I did, but it
4 should be consistent with the Alpha Phi Alpha report.

5 As you mention, I did not focus on the South
6 Metro area as I narrowly draw the district because, of
7 course, we're looking at a much larger geographic area
8 to get a congressional plan that involves thousands.

9 MS. KHANNA: Can I just clarify for the
10 record? Bryan, did you say 37? Paragraph 37?

11 MR. TYSON: Oh, wait. I'm sorry. Yes.
12 Because at 38 is what starts the analysis of the 2021
13 plan, I believe.

14 MS. KHANNA: Right.

15 MR. TYSON: Oh, I'm sorry. 35.

16 MS. KHANNA: But 36 and 37 talk -- yeah.
17 Okay.

18 MR. TYSON: Correct.

19 MS. KHANNA: 36 and 37 talk about the
20 congressional benchmark plan.

21 MR. TYSON: Yes. I apologize. That should
22 be ending at 35. Yeah.

23 THE WITNESS: Right.

24 BY MR. TYSON:

25 Q Mr. Cooper, just briefly, then, so for

1 Figure 1, you'd agree that the change in the percentage
2 of AP black population in Georgia from 2010 to 2020 was
3 a one and a half point increase from the 2010
4 percentage to the 2020 percentage; right?

5 A We're looking at Figure 1?

6 Q Yes, sir.

7 A Yes. A lot of people. A lot of people.
8 484,000. So more than half of a congressional
9 district.

10 Q And turning to Figure 2 on page 8, you're
11 comparing the estimates of the 2020 AP black VAP, the
12 2021 citizen voting age population statistics; right?

13 A In Figure 2?

14 Q Yes. On page 8.

15 A Yes.

16 Q Okay.

17 A For the state.

18 Q For the entire state, yes.

19 And do you recall in your preliminary
20 injunction report you used the 2019 CVAP numbers?

21 A I do recall that. You pointed that out, I
22 think, the other day. So yes. I do. I do recall
23 that.

24 Q Okay. And do you recall that there had been
25 a decrease in the black citizen voting age population

1 between the 2021 CVAP number and -- I'm sorry -- the
2 2019 CVAP number and the 2021 CVAP numbers?

3 A I do, as you pointed out, and there is a
4 slight decrease but there's also a more significant
5 decrease, I believe, in non-Hispanic white CVAP over
6 that two-year period.

7 I would attribute that to increases in Latino
8 and other minority populations that have gained
9 citizenship over that two-year period or just turned 18
10 having been born in the United States.

11 Q Let's move to paragraph 35, which is the end
12 of your demographic analysis section.

13 A Yes. And this paragraph 35 is not actually
14 in my Alpha Phi Alpha declaration, of course, because
15 it's focusing on the congressional material.

16 Q Certainly. Yes. And I understand there may
17 be some -- maybe not all the information in Alpha Phi
18 Alpha is in this report as well.

19 You say: "Given the dramatic increase in
20 Georgia's black population in Metro Atlanta during this
21 century, the obvious focal point for determining
22 whether an additional majority black district can be
23 created in the state is indeed Metro Atlanta."

24 Do you see that?

25 A Yes.

1 Q Can you just explain to me kind of what
2 methodology you used? Was it just looking at the
3 numbers and reaching that conclusion? How did you
4 arrive at the conclusion that the obvious focal point
5 for an additional majority black district was Metro
6 Atlanta?

7 A Well, just looking at the numbers. If you
8 look at the year 2000, there were about 1.25 million
9 African-Americans living in Metro Atlanta. And by
10 2020, that number had increased to almost 2.2 million.

11 So we've seen an increase of, as the table in
12 Figure 7 shows, 938,000 African-Americans over a
13 20-year period just in the Atlanta MSA.

14 And over that same time period, the
15 non-Hispanic white population has grown, but ever so
16 slightly, from 2.57 million to 2.66.

17 Q And you'll recall in the Alpha Phi Alpha case
18 you talked about a variety of regions in other parts of
19 Georgia where you looked at changes in growth in black
20 population.

21 Do you remember that?

22 A Yes.

23 Q Okay. And I know you mentioned earlier the
24 Dwight case where you had testified in 2018 or 2019; is
25 that right?

1 A Yes. It didn't go to trial. I think I did
2 file -- or filed a declaration and maybe it was -- I
3 was deposed by you, I thought, at least.

4 (Exhibit 3 Marked for Identification.)

5 BY MR. TYSON:

6 Q And so I don't know if you have Exhibit 3 in
7 front of you, but I can share my screen if not.

8 Do you have your report in the Dwight case
9 handy?

10 A I do not.

11 Q Okay. I'll just share my screen then, if
12 that works.

13 All right. Mr. Cooper, are you able to see
14 my screen here?

15 A Yes.

16 Q And so just going down to page 2, we'll mark
17 this as Exhibit 3, this will be the report from Dwight
18 versus Kemp, and it's the declaration of William S.
19 Cooper.

20 Do you see that?

21 A Yes.

22 Q And do you recall offering the expert report
23 in the Dwight case?

24 A I do.

25 Q Okay. And do you recall what area of the

1 state you analyzed in the Dwight case?

2 A Well, it was the -- this is the congressional
3 plan. So I was looking at the whole state.

4 Q Okay. And so turning to Figure 8 -- I know
5 this is a little difficult to see, but Figure 8 is
6 titled "2010 Percent Black by County - 71-County Area
7 Bounded by Green Lines."

8 Do you see that?

9 A Yes.

10 Q And do you see the 71-county area that starts
11 roughly north of Augusta in Lincoln and Wilkes County,
12 runs down to Macon, down south to Thomas and Brooks
13 Counties, and then over along the coast and back up to
14 the South Carolina border?

15 A Yes.

16 Q And that's the area you evaluated in the
17 Dwight case; is that right?

18 A Correct.

19 Q And then turning to page 27 of that report,
20 you created a majority black District 12 that joined
21 African-American communities in Macon, Augusta, and
22 Savannah in the Dwight case; right?

23 A Yes.

24 Q And in the Dwight case, you didn't look at
25 Metro Atlanta. You looked at this 71-county area in

1 South Georgia; right?

2 A That is my recollection, that that litigation
3 and that district was focused on that area.

4 Q And in this case, you didn't consider any
5 other areas of the state for an additional majority
6 black district besides Metro Atlanta as indicated in
7 your report; right?

8 A Well, that's true. Remember, in the Dwight
9 case, I was relying on 2010 census data. So even
10 though I was aware that there had been significant
11 black population growth based on census estimates in
12 2018, I was still stuck using the 2010 data for Metro
13 Atlanta.

14 Q And do you recall -- well, I guess do you
15 recall reviewing the growth in black population in
16 Metro Atlanta as part of the Dwight case? And I know
17 that was a long time ago so that may not be something
18 you remember.

19 MS. KHANNA: I'm also going to object to the
20 extent that this calls for any draft analyses in that
21 case.

22 I know we're going even farther back in your
23 memory, but you can answer if you can. But be careful
24 about disclosing anything about your draft reports or
25 draft analyses.

1 THE WITNESS: Yeah. I don't remember the
2 details, but I do believe that I also looked at
3 districts that would have -- a district that would have
4 gone into South Metro area of Atlanta.

5 That's the extent of the detail I know.

6 BY MR. TYSON:

7 Q And I know we spent a lot of time talking
8 about the black belt in the Alpha Phi Alpha case, but I
9 didn't find any references to the black belt in this
10 report.

11 Is that right?

12 A I did not reference that in this report. But
13 some of the counties identified or school districts
14 identified as being part of the black belt would
15 include parts of Metro Atlanta.

16 Q So let's move to page 16 of your report then,
17 and paragraph 40. And this is beginning the section of
18 your report analyzing the 2021 enacted plan; is that
19 right?

20 A Yes.

21 MS. KHANNA: And, Bryan, I'm just noting if
22 we're moving on to a new topic, would now be a good
23 time for a break? I think it's been about an hour.

24 MR. TYSON: Oh, sure. It actually has been
25 about an hour. That would work. Do you want to do 5,

1 10 minutes?

2 MS. KHANNA: Works for me.

3 (Off the record 11:44 a.m. to 11:52 a.m.)

4 (Exhibit 2 Marked for Identification.)

5 BY MR. TYSON:

6 Q All right. So, Mr. Cooper, as we get into
7 your analysis of the 2021 plan, I did want to clarify
8 one point. We're going to mark your preliminary
9 injunction report as Exhibit 2 and the Dwight report as
10 Exhibit 3 just so we're clear on kind of which exhibits
11 go where in your deposition.

12 But what I want to do next is turn to the
13 2021 plan analysis as part of Exhibit 1, your report in
14 this case. And you point out in paragraph 40 that "The
15 2021 plan reduces CD 6's BVAP from 14.6 percent under
16 the 2012 benchmark plan."

17 Do you see that?

18 A Yes.

19 Q And you'd agree that Congressional District 6
20 was electing a black candidate to Congress at that
21 14.6 percent black voting age population number; right?

22 A Yes.

23 Q And then the 2021 plan, you say in that
24 paragraph 40, lowered the black voting age population
25 by not quite 5 points to 9.9 percent; is that right?

1 A I believe so unless I've made an error.

2 Q Okay. And you reference in that paragraph
3 that "The decrease occurred in an area that has
4 experienced significant growth in the black population
5 since the 2010 census."

6 But as I looked at your report, I only
7 found -- you looked only at whole counties to make the
8 determination about the growth in black population
9 since the 2010 census; is that right?

10 A Yes. That's what I focused on in Figure 8.
11 I did have some information, I suppose, about municipal
12 population change as well.

13 Q So when you say in paragraph 40 that "The
14 decrease occurred in an area that has experienced
15 significant growth in black population," the area
16 you're referring to is the whole counties that were
17 part of CD 6 on the benchmark plan?

18 A Yes. I think CD 6, was primarily in Cobb
19 County, if I'm not mistaken. I could be mistaken. And
20 so there was strong growth in the black population
21 there.

22 Q So the area you're referencing in
23 paragraph 40 is not the boundaries of CD 6 on the
24 benchmark plan, it's the counties where CD 6 was
25 located; right?

1 A Yes. That's probably more to the point.

2 Q So turning to paragraph 44 on page 18, you
3 reference several state senate districts in Metro
4 Atlanta.

5 Do you see that?

6 A Yes.

7 Q And of the three districts you reference in
8 paragraph 44 -- I'm sorry, the four districts you
9 reference in paragraph 44, three are majority black and
10 you say the fourth is racially diverse; is that right?

11 A Yes.

12 Q And by "racially diverse," what do you mean
13 by that term?

14 A That it's not majority black, but it has a
15 significant minority population. I'm referencing
16 Senate District 33, which is 43 percent black, but with
17 additional minority population.

18 Q So Senate District 33 would be a majority
19 minority district, but not a majority black district?

20 A Yes. Correct.

21 Q Now, the illustrative Senate Congressional
22 District 6 is not drawn in the same footprint of those
23 four state senate districts; right?

24 A No, it's not. And that's partly my fault.
25 Perhaps I should have numbered what you see as

1 District 11 as District 6 and District 6 as District
2 11, if that makes any sense to you. Because
3 District 11, in Cobb County, I believe, under the 2021
4 plan, is more like the old District 6, I think. I'm
5 not looking at the map.

6 Q Well, maybe we can clarify that.

7 Can you turn over to Figure 10 on page 20?

8 A Yes.

9 Q And so this is an overlay where you put the
10 enacted senate districts that you referenced in red on
11 the illustrative plan that you drew for purposes of
12 this report; right?

13 A Right.

14 Q Okay. And so is what you're saying that
15 what's marked 11 near the top of Figure 10 is more the
16 existing area of District 6 than it is District 11?

17 A In the 2012 plan?

18 Q Yes.

19 A I think that may be the case.

20 Q So you reference these four senate districts,
21 but in terms of looking at them, it looks like only a
22 small piece of Senate District 39 is in District 6.

23 Do you agree with that, near Union City?

24 A In terms of geographic area, it's a smaller
25 piece, yes.

1 Q And for Senate District 38, a small
2 geographic area in Fulton and a small portion of Cobb
3 along the Fulton border up to Smyrna is included?

4 A Yes.

5 Q And you'd agree there are large geographic
6 areas in Senate District 39 and 38 in Fulton County
7 that are not included in illustrative District 6;
8 right?

9 A Yes.

10 Q And you'd agree those state senate districts
11 don't go down into Fayette County; right?

12 A They do not.

13 Q And they don't go as far north as Kennesaw at
14 the top of illustrative 6; right?

15 A They do not.

16 Q So I guess maybe I'm trying to understand.
17 Back in paragraph 44, you used the composition of these
18 four state senate districts to conclude that District 6
19 can be readily drawn, but it doesn't look like, aside
20 from 33 and 35, much of those state senate districts is
21 in District 6.

22 So how did you use those four state senate
23 districts to draw your conclusions about the creation
24 of illustrative District 6?

25 A Well, it's a point of departure. Obviously,

1 significant black population in South Fulton County, in
2 Douglas, and in parts of Cobb County. So that was the
3 point of departure. And -- well, you see the end
4 result. There's really no question that the population
5 is there and it is sufficient to create a majority
6 black district, congressional district.

7 Q All right. Did you look at these state
8 senate districts before or after you drew illustrative
9 District 6?

10 A Probably simultaneously. I mean,
11 illustrative District 6 is very similar to the
12 illustrative District 6 in the preliminary injunction
13 plan. There are differences, of course, but I was also
14 looking at the Senate plan back in December, November
15 of 2021 as I was working on the Alpha Phi Alpha case.
16 So I was aware these districts were there.

17 Q And maybe if we could, let me just share
18 Exhibit 2, your preliminary injunction report. On
19 page 70, which is Exhibit K, is this the area that you
20 drew for District 6 on the preliminary injunction
21 report?

22 A Yes. That is the plan I drew for the
23 preliminary injunction. Right.

24 Q And so just looking at that versus Figure 10
25 in your 12/5 report, as I can see the differences,

1 you've made Douglas County whole; is that right?

2 A Yes.

3 Q You've introduced a new split of Cobb by
4 bringing District 3 into Cobb County on the 12/5 plan;
5 right?

6 A That is correct.

7 Q It looks like you took part of East Cobb and
8 put it into the 11th district on the 12/5 plan as
9 compared to the PI plan; is that right?

10 A Well, yes. Yes. I included a little bit
11 less of Cobb County in the 12/5 plan or the
12 illustrative plan attached to my December 2022
13 declaration.

14 So I did not take the district as far north
15 as Acworth, for example, which I did do in the
16 preliminary injunction report. I know you had concerns
17 about that so I took your concerns into account as I
18 was drawing the illustrative plan in my December 2022
19 declaration.

20 Q And you also altered the split in Fayette
21 County, it looks like, from Fayetteville over to the
22 western side of the county; is that correct?

23 A That is correct. To -- to meet one person,
24 one vote, I had to include part of Fayette County in
25 District 6 to meet one person, one vote in District 13

1 without -- I could have split up another county, I
2 suppose.

3 But in order to avoid splitting a county
4 like, say, Coweta or one of the others, I added that
5 portion of Fayette County into District 6. It's
6 basically hugging the county line around Tyrone and
7 just outside of Fayetteville to the northwest.

8 Q Okay. And so you said in order to avoid
9 splitting another county, you had to split Fayette.

10 Did I hear that right?

11 A Well, yeah. I think so. I mean, there may
12 have been -- there may be some other way to do it, but
13 I was focused on equalizing the population in
14 District 13, not District 6 because I could have
15 extended District 6 north, and I didn't do that, you
16 know, to make up that difference. But I had to take
17 population out of District 13 under this configuration
18 from Fayette County just to get plus or minus one for
19 District 13.

20 Q Is not changing District 5 part of the reason
21 why you had to split Fayette County on this plan?

22 A Perhaps. Perhaps.

23 Q Because you'd agree if you were willing to
24 change the boundaries of District 5, you could alter
25 the split between District 5 and District 13; right?

1 A That's true. But then I would have to make
2 some other change to District 5, which would affect
3 District 4. So there's this ripple effect. But there
4 are -- you know, there would be different
5 configurations. This is just an illustrative plan.

6 Q And on the illustrative plan, you chose not
7 to alter the boundaries of District 5 as drawn by the
8 General Assembly; right?

9 A Right. I made it a priority to try to avoid
10 changing districts that the Legislature had drawn where
11 possible. And so I was able to isolate the changes to
12 8 of the 14 districts.

13 Q So let's turn to paragraph 48 where you
14 discuss traditional redistricting principles. And you
15 say in paragraph 48 that "The illustrative plan adheres
16 to traditional redistricting principles."

17 Do you see that?

18 A Yes.

19 Q Then you list a number of principles. When
20 you say in paragraph 48 the illustrative plan adheres
21 to traditional redistricting principles including the
22 principles you listed, are you saying something
23 different than what you said in paragraph 10, that the
24 plan was designed consistent with traditional
25 redistricting principles?

1 A I think it's synonymous.

2 Q Synonymous? So it's the same thing?

3 A Yes.

4 Q And then I know we talked about communities
5 of interest a little while ago.

6 Looking at illustrative District 6 in
7 Figure 10 there on page 20, what are the communities of
8 interest that you can identify located in illustrative
9 District 6?

10 A Well, illustrative District 6 is largely
11 suburban/exurban Atlanta. So it's part of the Atlanta
12 core counties, the 11 core counties, which are also
13 part of the Atlanta MSA. So there are economic and
14 transportation commonalities there, lots of small
15 cities. It can get sort of rural once you get out into
16 western Douglas County, for example. I took a little
17 spin around the district in -- on Saturday after our
18 deposition on Friday of last week and visited parts of
19 Douglas and extended all the way -- drove actually
20 almost halfway to Villa Rica.

21 I guess you say it differently though, don't
22 you? How do you say that?

23 Q We say "Villa Rica." That's where my Tysons
24 are from actually, is in Villa Rica.

25 A Pardon?

1 Q That's where my Tyson family is from, is from
2 Villa Rica.

3 A Oh, obviously -- I thought you said that's
4 where Mike Tyson's from. Oh, yeah.

5 Q When you were creating your illustrative
6 plan, did you seek to have respect for communities of
7 interest in all the districts, not just in illustrative
8 District 6?

9 A Well, at least in the districts that I
10 changed, I did, because I had some ability to make
11 decisions as to how the lines are drawn. And I just
12 accepted at face value the districts that I didn't need
13 to change.

14 Q And in district -- in paragraph 50, you said
15 that in drawing the illustrative plan, "I sought to
16 minimize changes to the 2021 plan while abiding by all
17 of the traditional redistricting principles listed
18 above."

19 Do you see that?

20 A Yes.

21 Q And you did not -- you have not submitted in
22 your report a plan that makes fewer changes to the 2021
23 plan to create a majority black district beyond the
24 plan that's included in this report; right?

25 A I have not. But I'm not -- I'm not stating

1 with certainty that it's not possible, I just didn't
2 try to do that.

3 Q Do you have a plan that makes fewer changes
4 that you're planning to submit in this case?

5 A Not at this point, no.

6 Q And I believe we covered this yesterday, but
7 you didn't -- and earlier.

8 You don't use any political data at any point
9 when drafting or evaluating the illustrative plan in
10 Exhibit 1; right?

11 A I do not.

12 Q Turning over to paragraph 51 on page 22,
13 there's a list of the districts that you changed under
14 the illustrative plan.

15 Do you see that?

16 A Yes.

17 Q Of that list, is it correct that all of them
18 are currently electing Republicans except for
19 Congressional District 4 and Congressional District 13?

20 A I honestly don't know, but it's likely that
21 would be the case maybe.

22 Q Let's drop down to Figure 11, the
23 illustrative plan population summary also on page 22.
24 And this lists the total population for these
25 districts, not the voting age population for these

1 districts; right?

2 A Right. When I determine whether a plan
3 complies with one person, one vote, you have to rely on
4 total population.

5 Q And you'd agree that the highest AP black
6 percentage of any district on the illustrative plan is
7 53.59 percent in District 4; right?

8 A It looks like that is the case.

9 Q And not to get too far off track, but over on
10 page 29, you have a Figure 14 that shows the voting age
11 and black citizen voting age population numbers for the
12 illustrative plan and the 2021 plan; right?

13 A Yes.

14 Q And as you've configured it, District 6 on
15 the illustrative plan, if you were to use the
16 non-Hispanic citizen voting age population is
17 50.18 percent BCVAP; is that right?

18 A Non-Hispanic black. But it would be a little
19 bit higher if you used the non-Hispanic DOJ for blacks
20 in that figure.

21 Q And you'd agree that the illustrative plan
22 District 13, the non-Hispanic black CVAP is actually
23 below 50 percent -- I see it's above it on the DOJ
24 number; is that right?

25 A That's correct.

1 Q And the illustrative plan as compared to the
2 enacted plan lowers the black voting age population in
3 District 14 by almost 10 points; right?

4 A In District 14?

5 Q Mm-hmm.

6 A Well, it's 9 points.

7 Q Okay. 9-point drop?

8 A Yes.

9 Q And District 10 is a little bit more than an
10 8-point drop in the black voting age population from
11 2021 to illustrative; right?

12 A A little bit more than what? Eight points?

13 Q Eight points.

14 A Yes.

15 Q Okay. So what I want to do next, Mr. Cooper,
16 you have some exhibits, and I can either put them on
17 the screen here, or if you have them handy. But I want
18 to turn to Exhibit H-2, which is page 73 of the PDF and
19 I'm happy to share the screen if that's easier for you,
20 whatever you prefer.

21 A Do that. I think I have it, but I did not
22 get -- I was unable to connect to a Dropbox account.

23 So bring it on up. Yeah.

24 Q So here, just for reference, this is Exhibit
25 H-2 to Exhibit 1.

1 Do you see that?

2 A Yes.

3 Q And this is the illustrative plan that you've
4 submitted for the 12/5 report; right?

5 A Yes.

6 Q And so just looking at a few of the districts
7 that you changed at different points, you'd agree that
8 District 11 as it's configured connects Bartow County
9 here with North Fulton County; is that right?

10 A That is correct.

11 Q And is Bartow generally a rural county in
12 Georgia?

13 A It is exurban. And if you get up further
14 north near the Gordon County line, it's probably fairly
15 rural.

16 Q How about the portion of North Fulton in
17 District 11? Would you consider that a rural area in
18 the state?

19 A It's more urban.

20 Q And so District 11 unites some rural areas in
21 Bartow County with more urban areas in North Fulton
22 County? Is that fair?

23 A That's fair. But one could draw it
24 differently and put more of Bartow County in
25 District 14 and shift District 11 into Cherokee

1 perhaps.

2 Q But you haven't drawn that for this
3 illustrative plan; right?

4 A This is just an example. And so there would
5 be other ways to configure it, for sure.

6 Q And you'd agree, we looked earlier, there's a
7 small split geographically into Cobb County in
8 District 3; is that right?

9 A Yes.

10 Q And District 3 also includes Columbus,
11 Georgia, and Muscogee County, doesn't it?

12 A It does.

13 Q And it includes rural areas around Pike,
14 Lamar, Upson, and Meriwether Counties?

15 A Yes.

16 Q So can you identify for me in your
17 illustrative District 3 what community of interest
18 unites Columbus, Georgia, with part of Metro Atlanta
19 and West Cobb County?

20 A I want to look on a map here. You split --
21 the General Assembly split Cobb County into four
22 pieces, and I'm just trying to refresh my memory as to
23 whether -- here, it's apparent that the same general
24 area where I included part of Congressional District 3
25 is placed in even more, a larger area, is placed in

1 Congressional District 14, which is a very suburban
2 population in Cobb County, including parts of Marietta,
3 and extends into Paulding County and then north through
4 rural territory, including Floyd County, all the way to
5 Dade County and the Tennessee line.

6 So for that reason, I think that it is more
7 appropriate to connect that part of Cobb County with
8 District 3 in the south. It's a smaller area. And the
9 only reason that I actually included that part of
10 District 3 into Cobb County was for purposes of meeting
11 one person, one vote.

12 Are you still there?

13 Q I am. I'm sorry. So --

14 A I'll interject here and say that one could,
15 as I did in the PI plan, put part of Douglas County
16 into District 3 and avoid that split but then create a
17 split of Douglas County.

18 Q And you'd agree that on the PI plan, if you
19 went back to that Douglas County split, you'd be adding
20 a split county to the overall plan; right?

21 A You'd be adding a split county, but not
22 adding the additional county splits.

23 Q And I know I understand what you're saying,
24 Mr. Cooper, but just so the record is clear on that,
25 can you explain the difference between a split county

1 and the number of county splits?

2 A Yes. A split county is just what it says it
3 is, it's when a county is not in a single district. So
4 it's into -- it's divided into one or more other
5 districts.

6 County splits is just the total number of
7 unique county district combinations for the plan as a
8 whole. So in some cases, a county might be split three
9 times or even four times, as you've got in Cobb County
10 in the 2021 plan. So all those splits tallied up would
11 equal the number of county splits.

12 And the illustrative plan I have drawn has
13 18 county splits and the enacted plan has 21. So on
14 that metric, the illustrative plan is superior to the
15 enacted plan. And, of course, some of the splits built
16 into the illustrative plan are due to efforts to avoid
17 changing.

18 Q Thank you, Mr. Cooper. So circling back, I
19 asked you what the community of interest was between
20 the part of Cobb County in District 3 and Columbus.
21 And you answered by referencing the configuration of
22 District 14 on the enacted plan.

23 What would you say on your illustrative plan
24 is the community of interest that you were respecting
25 by placing this part of Cobb County through rural areas

1 into Columbus?

2 A Well, the 2021 plan goes as far north as the
3 Douglas County line. And then when you get to Paulding
4 County, it becomes part of District 14. So Paulding is
5 exurban, part of Metro Atlanta. And so I have included
6 Paulding County and a bit of Cobb County, which is a
7 good fit because Paulding is clearly a growing county
8 that is closely linked with the Metro Atlanta area, and
9 it may not be as closely related to Columbus. But at
10 some point, one does have to join areas that are not
11 necessarily next-door neighbors just to find 765,000
12 people.

13 I don't think it would in any way be an issue
14 overall.

15 Q So am I hearing you correctly, then, that you
16 can't identify a specific community beyond the
17 connection between Paulding and Cobb Counties but that
18 at some point, one person, one vote means you have to
19 reach the right number of people? Is that right?

20 A Well, that is a factor, but I don't think
21 that Columbus is so different that it is problematic to
22 include that part of western Georgia with Metro
23 Atlanta, western part, along Paulding and Carroll
24 County lines there.

25 Q Do you think that's also true of the enacted

1 District 14, which combines West Cobb and Paulding with
2 areas running north?

3 A It's less of a problem, I think. Because
4 really, once you -- once you include South Cobb County
5 into District 14, you're in effect adding in Cobb
6 County -- you're placing Cobb County not only into a
7 district that includes the suburbs of Chattanooga, but
8 also into a district that is part of Appalachia. And
9 so it's quite different.

10 I think the distinction there is probably
11 greater than would be the distinction between Cobb
12 County and the Columbus area. Although Cobb County
13 does have a high mountain; right? Kennesaw Mountain is
14 a thousand feet or something like that. I'm only being
15 halfway facetious. It's not quite as mountainous as
16 some parts of existing District 14.

17 Q So just so I understand, existing District 14
18 takes in part of western Cobb County in the south part
19 of the county. Illustrative District 3 takes in part
20 of western Cobb County not quite as far south. Both
21 unite that western part of Cobb County with more rural
22 areas and other metropolitan areas.

23 What is the distinction between those two
24 decisions of how to split Cobb County that you see?

25 A Well, I sort of tried to make that

1 explanation, that there is a closer tie to Metro
2 Atlanta and the counties that are just outside of Metro
3 Atlanta, like Harris and Troup than would be the case
4 of, say, Union and Fannin in the far north.

5 Q And what is -- how are you assessing the
6 connection with Fannin and Union towards metro with
7 Heard and Troup and I'm assuming down to Columbus with
8 Metro Atlanta?

9 A Well, that's how I've drawn this plan. There
10 may be other ways to do it, but I was trying to keep
11 District 2 intact and not change it. So this was the
12 result.

13 And if it is a problem, then one could split
14 Douglas County as the existing plan does, I believe,
15 and then eliminate the need to put any part of
16 District 3 in Cobb County. There would be other ways
17 to draw it if that's truly a big issue.

18 Q So I guess I just want to make sure I
19 understand.

20 For the community of interest in illustrative
21 District 3, the community of interest that you identify
22 is that there is a closer connection between the
23 portion of West Cobb and Paulding that is included in
24 District 3 in the illustrative plan and Heard and Troup
25 Counties versus counties in North Georgia.

1 Do I have that right?

2 A The lay of the land is closer, yeah.

3 Q Okay. Are there any other communities of
4 interest you can identify connecting that portion of
5 western Cobb County to Columbus and Pike, Upson, and
6 Lamar Counties?

7 A It's a part of Metro Atlanta. So Paulding is
8 suburban, exurban. Obviously, that part of Cobb County
9 is largely suburban. And the counties to the south are
10 certainly part of Metro Atlanta. So I'm not sure what
11 the issue is.

12 But if there is an issue, there would be
13 work-arounds by just keeping District 6 roughly as it
14 is and maybe changing District 11. I mean, they're
15 just -- as I've drawn it in the illustrative plan. So
16 there would be other options.

17 Q Okay. But to be clear, you haven't drawn
18 those other options; you just believe they could be
19 drawn?

20 A I mean, there's no question they could be
21 drawn. You could just change District 11 which, in
22 turn, would change District 3 in some fashion. So
23 there is a ripple effect. But one could do that.

24 I believe, I could be mistaken, but I think
25 the total population that would be affected by this

1 District 3 split is significantly less than the total
2 population of Cobb County which is affected by the
3 incursion of District 14 into Cobb County.

4 Q So when you say in paragraph 48 "The
5 illustrative plan adheres to traditional redistricting
6 principles" and list one of those as respect for
7 communities of interest, again, the community of
8 interest for District 3 as it's configured on the
9 illustrative plan is the connection between Metro
10 Atlanta counties and areas around Columbus; is that
11 right?

12 A As far south as Columbus, yes. And it's
13 almost entirely within Metro Atlanta except for Troup,
14 Harris, and the Columbus area -- and Upson County,
15 which is on the outer ring. So it's much more of a
16 Metro Atlanta district than, say, District 14 as drawn
17 in the existing plan, the enacted plan.

18 Q Flipping over to the other side of the state,
19 District 10, it runs starting at Hancock in the south
20 all the way up to Rabun County in the north; right?

21 A In the illustrative plan?

22 Q Yes.

23 A Yeah. It does.

24 Q And we talked a lot yesterday about -- or not
25 yesterday. Last week, I guess it was, about Wilkes and

1 Hancock and other counties, Taliaferro in eastern
2 Georgia being part of a new majority black state senate
3 district that you created in one of the other cases;
4 right?

5 A We have discussed that in the other case.

6 Q So can you tell me what the community of
7 interest is between majority black Hancock County and
8 the Appalachian Mountains and Rabun and Towns County on
9 the North Carolina border?

10 A Well, again, the connection is not very
11 strong, but one has to balance out the populations so
12 that you have 14 districts that are roughly 765,000
13 people. So, again, there would be other ways to draw
14 it.

15 Q So, Mr. Cooper, when you talked about, in
16 paragraph 48, the illustrative plan adhering to
17 traditional principles and you listed the various
18 principles, it sounds like what you're saying is
19 population equality is really the most important
20 principle even more so than being able to explain where
21 there's communities of interest between different parts
22 of districts.

23 Do I have that right?

24 A Well, actually I think you do. It's a
25 nonstarter. If it doesn't meet population equality or

1 something very close to plus or minus one, then it's a
2 nonstarter. Right?

3 Q And so then after population equality, what
4 other traditional redistricting principles explain the
5 configuration of District 10 on the illustrative plan?

6 A I was following county boundaries. I think
7 there's a split of Wilkes County. And I believe
8 Lumpkin County, but there are no other county splits I
9 believe, unless -- maybe Hall County is split.

10 But I was attempting to draw a plan that was
11 reasonably compact, reasonably shaped that -- I had the
12 information about the incumbents, I think, at maybe the
13 latter stage of drawing the plan. So I was probably
14 attempting to avoid placing a couple of incumbents who
15 live very close to one another in the Jackson County
16 area, I think. I was attempting to put them, maybe, in
17 different districts even though I understand they don't
18 have to be, I believe. I'm not looking at the
19 incumbents right now and haven't done so since
20 December.

21 Q So, Mr. Cooper, in paragraph 48, I didn't see
22 where you listed incumbents as a traditional principle
23 as part of the illustrative plan, and thought that we
24 had talked about earlier that incumbency wasn't as
25 important.

1 Did you use incumbency data in the drawing of
2 the illustrative plan?

3 A I was sort of aware of where I thought the
4 incumbents lived. It's always in the background. So
5 that was in the background.

6 Q So beyond incumbency and keeping counties
7 whole minus Hall, Lumpkin, and Wilkes Counties, and
8 population equality, are there any other traditional
9 redistricting principles that went into the districting
10 of District 10?

11 A Well, I had to make the plan reasonably
12 compact. I tried to follow county boundaries. The
13 district's contiguous. It looks as compact as the
14 districts that have been drawn in the enacted plan.
15 But it could be drawn differently.

16 Q But you'd agree that there's not a community
17 of interest between majority black Hancock County and
18 Rabun County in extreme northwest Georgia, wouldn't
19 you?

20 A They are different. They are different. And
21 so I am open to other suggestions for how one might
22 draw District 10.

23 Q And I understand they're different. My
24 question was: You'd agree there's not a community of
25 interest between Hancock and Rabun counties; right?

1 A Well, not entirely. Because most counties
2 are quite poor. And in Rabun County, you'd be talking
3 about poor whites. And in Hancock County, a fairly
4 significant black population that is not experiencing
5 prosperity. So there are connections there. There are
6 connections in that regard.

7 Q So you believe a community of interest in
8 illustrative District 10 would be poor white voters in
9 the Rabun and similar socioeconomic status black voters
10 in Hancock County?

11 A Could be. Could be. On certain
12 socioeconomic issues.

13 Q Was that the community of interest you
14 considered when you drew illustrative District 10?

15 A When I was drawing District 10, I was mainly
16 trying to avoid splitting counties and meet one person,
17 one vote requirements. And I was aware that there are
18 different areas in the sense that Rabun County is
19 Appalachian and that parts of the southern end of
20 District 10 are in the historic black belt.

21 Q And you'd agree that Athens and Clark County
22 is included in District 10 on the illustrative plan;
23 right?

24 A That's right. There's a university there.

25 Q And --

1 A So the district is a somewhat diverse
2 congressional district as I've drawn it.

3 Q You'd agree that Athens and Clark County
4 doesn't share the same socioeconomic conditions as
5 Hancock and Rabun Counties; right?

6 A Generally speaking, the population in Clark
7 County is better off socioeconomically than Rabun and
8 Hancock.

9 And one can say the same thing about the
10 population in Cobb County versus the population in
11 parts of North Georgia.

12 Q I'm not sure I follow you. I'm sorry.

13 A Well, there's -- there are probably areas
14 along the Tennessee line that are quite challenged
15 economically and very different, once you get away from
16 the suburbs of Chattanooga, than the southwest part of
17 Cobb County, which is exurban, suburban, and,
18 relatively speaking, prosperous.

19 Q Did you review any socioeconomic data about
20 counties along the Tennessee border in the drafting of
21 your illustrative District 14?

22 A I did not. Part of that is the
23 North Carolina border. But I almost don't need to do.
24 I'm familiar with Appalachia.

25 Q Looking at District 13, are you aware that

1 District 13 in Clayton County begins near the Atlanta
2 airport as you've drawn it?

3 A Yes.

4 Q And you'd agree that Butts and Jasper
5 Counties on the eastern side of District 13 as drawn
6 are rural counties; right?

7 A They are rural, but still part of Metro
8 Atlanta. In other words, the Census Bureau has
9 determined that there's a 29-county area where there
10 are commuting and transportation ties that are
11 significant enough to put those counties into Metro
12 Atlanta.

13 Q But you agree that District 13 as drawn
14 connects urban areas in Clayton County with rural areas
15 in Fayette, Spalding, Butts, and Jasper Counties;
16 right?

17 A Yes.

18 Q Are you aware that the only majority black
19 portions of any county in District 13 as drawn is the
20 portions in Clayton and Newton Counties?

21 A Well, there's obviously black population and
22 significant black population in some of the other
23 counties. Henry County is almost majority black. It's
24 50/50. And the black population is growing. Fayette
25 County has a significant black population that is

1 growing.

2 So I'm not -- I'm just not that focused on
3 the pieces of a particular county in terms of the
4 actual percentages involved, but I do know there's
5 significant black population in the area that comprises
6 District 13, including South Metro counties like
7 Spalding and, of course, Fayette and Henry.

8 Q Okay. Let's take a look at that. Exhibit
9 Number I-3 of your declaration, this is the plan
10 components report for the illustrative plan; right?

11 A Right.

12 Q And this shows, for the portion of each
13 county located in a district, what the population and
14 racial breakdown of the portions of those counties in
15 that district is; right?

16 A Right. And I'll stress that this was
17 reported after the plan had been completed. In other
18 words, I was focusing on what the component parts were
19 as I was drawing the plan.

20 Q And so looking at District 13, do you agree
21 that the portion of Butts County in District 13 is
22 27.80 percent AP black VAP; right?

23 A Right. It's a significant black population.

24 Q Right. And Clayton, the portion in Clayton
25 is 71.9 percent AP black VAP?

1 A Yes.

2 Q And the portion in Fayette is 25.99 percent
3 AB black VAP.

4 A Also significant.

5 Q Okay. The portion in Newton is 58.35 percent
6 black VAP; right?

7 A Right.

8 Q And the district as a whole is 51.13 percent
9 AP black VAP; correct?

10 A Correct.

11 You skipped over Henry County.

12 Q Henry County is majority in total population
13 but not majority on voting age population; is that
14 right?

15 A Well, it might as well be. It's
16 49.82 percent.

17 Q Okay. But you'd agree the statistic is not
18 over 50 even if you're saying it's effectively over 50?

19 Do I have that right?

20 A At that point in time, two years ago. I'd
21 bet that it's over 50 now in population change that's
22 being experienced in South Metro Atlanta. But I don't
23 have any information to put forth that would clarify
24 that.

25 Q Okay. Let me just keep us in the exhibits

1 for a minute. Let me turn to -- this is part of
2 Exhibit I-3, and this is District 6, the zoom on the
3 illustrative plan.

4 Do I have that right?

5 A Yes.

6 Q And so just to clarify the boundaries as
7 drawn, in Cobb County, we have a portion of Cobb in
8 District 6, all of Douglas, a portion of Fulton south
9 of District 5, and a little bit of Fayette County;
10 right?

11 A Right.

12 Q Okay.

13 A Again, as I said earlier, that's because I
14 needed to get the population in District 13 to plus or
15 minus one person.

16 Q And let me turn back to the plan components
17 report for just district -- this district. This is,
18 again, part of Exhibit I-3, and this begins with
19 District 6 at the bottom of page 8.

20 Do you see that?

21 A Yes.

22 Q And you'd agree the portion of Cobb County
23 that is located in illustrative District 6 is
24 37.4 percent black; right?

25 A VAP, yes.

1 Q VAP, yes. Voting age population.

2 And Douglas is, like Henry, majority in total
3 population but below majority on voting age population
4 as a whole; right?

5 A As a whole. Barely below.

6 Q Yes. And the Fayette portion that's included
7 in illustrative District 6 is a total of 4,143 people;
8 is that right?

9 A Correct.

10 Q And it's only 21.73 percent black VAP?

11 A Correct.

12 Q So the only portion of a county in
13 illustrative District 6 that is majority black voting
14 age population is the Fulton County portion at
15 88.29 percent; is that right?

16 A Yes. But as I referenced, Douglas County is
17 almost 50 percent. And so is Henry County.

18 Q Based on looking at this --

19 A I'm sorry. I was referencing District 13,
20 not District 6. Excuse me.

21 Q Looking at this report for District 6, you'd
22 agree that making District 6 a majority black district
23 on voting age population requires the population in
24 Fulton County; right?

25 A It would -- it does include a significant

1 piece of Fulton County.

2 Q And my question was a little different, which
3 is --

4 A That's already in majority black districts,
5 but I did shift it from District 13 into District 6.

6 Q And you shifted the portion of Fulton from
7 District 13 into District 6. And without that portion
8 of Fulton, the district would not be majority black
9 from the remaining components of the district,
10 including Cobb County; right?

11 A As drawn, that's true.

12 Q Let's return back to your main report.

13 MR. TYSON: Is everybody still good? We've
14 been going about an hour. Do we want to take one more
15 quick break? I've got a little ways to go but not much
16 more.

17 (Discussion off the record.)

18 BY MR. TYSON:

19 Q So, Mr. Cooper, let's move to page 26 of your
20 report that focuses on the communities of interest that
21 you reference here.

22 Are you with me on that?

23 A Page 26. Okay.

24 Q So in paragraph 65, you reference the three
25 Cobb County splits or three pieces of Cobb County in

1 illustrative District 6 versus four splits in the 2021
2 plan; is that right?

3 A Right.

4 Q And you'd agree that the illustrative plan
5 still splits Fulton County into four pieces; correct?

6 A Correct.

7 Q In paragraph 66, you talk about geographic
8 conflicts between municipality lines and VTD lines.

9 If you faced a choice between a VTD line and
10 a municipality line, did you consistently choose one
11 over the other in drawing the illustrative plan?

12 A No. I made judgment calls where that
13 conflict arose, and I couldn't tell you which one won
14 out in the end. I know the State, for whatever reason,
15 doesn't seem to mention municipal boundaries. But
16 there is a stated objective to use precincts on the
17 State's website anyway.

18 Q And in paragraph 67, you say that looking at
19 counties, municipalities, and VTDs "together with
20 census tracts and census block groups are the best way
21 to achieve a quantifiable measure of the extent to
22 which a redistricting plan respects communities of
23 interest."

24 Do you see that?

25 A Yes.

1 Q And so is it your belief that the only
2 objective way to measure respect for communities of
3 interest is by looking at splits of these various
4 levels of geography, counties, municipalities, and VTDs
5 with census tracts and block groups?

6 A That's the only objective measurable way,
7 although not exactly in the background, but one also
8 needs into take into consideration the nondilution of
9 the majority voting strengths and communities of
10 interest as it would relate to cultural and historical
11 factors.

12 But there is this objective way, which is
13 just to look at how counties and municipalities and
14 VTDs are kept whole, particularly counties and
15 municipalities. But VTDs are constantly changing. And
16 most people don't even know what the name of the VTD is
17 that they live in. I couldn't tell you what VTD I live
18 in.

19 Can you tell me what VTD you live in?

20 Q I'm in Mount Bethel 04.

21 A What is it?

22 Q Mount Bethel 04.

23 A Okay. Very good. Very good.

24 Q Though I expect I'm the small minority of
25 Georgians who know that.

1 MS. KHANNA: That was impressive, Bryan, you
2 passed the test of you being deposed today.

3 MR. TYSON: That's right.

4 Mr. Cooper and I had to stop the deposition
5 Thursday or Friday to satisfy our curiosity about
6 whether a particular precinct was split. So I think
7 it's kind of dangerous for us to be in a deposition
8 together.

9 THE WITNESS: Well, now it's really
10 dangerous. This was off the record in the other case.
11 Bryan says he likes to draw plans and actually does it
12 in his free time sometimes.

13 MR. TYSON: Not in Georgia, but yes.

14 BY MR. TYSON:

15 Q Let's keep moving here. So --

16 A I am not a glutton for punishment. I don't
17 do that in my free time.

18 Q Makes sense.

19 So, again, just to kind of close the loop on
20 the communities of interest, Mr. Cooper, aside, then,
21 from looking at splits of various pieces of census
22 geography, you'd agree that there's no way to determine
23 whether a particular plan follows any particular
24 communities of interest because it's so subjective once
25 you get beyond the geographic splits; is that right?

1 A There is that, yes. Well, I mean, there
2 would be ways. You could draw some pretty
3 crazy-looking districts that just use counties and
4 VTDs, and then compactness scores would come into play.

5 Q So in paragraph 67 when you say that looking
6 at those levels of geography are the best way to
7 achieve a quantifiable measure of the extent to which a
8 districting plan respects communities of interest, I
9 believe what you just said is that even if it respects
10 communities of interest, measuring counties and VTDs,
11 you're saying it still could violate traditional
12 redistricting principles?

13 A It is a first-order plan, but there's always
14 other things in the background, like pairing incumbents
15 or drawing crazy-looking districts that happen not to
16 split precincts. So it would not be visually compact.
17 Although you could draw some pretty crazy-looking
18 district graphs that are not visually compact but do
19 perhaps arguably preserve a community of interest. For
20 example, some sort of a coastal district.

21 Q So then the mere fact that you can run the
22 number of splits doesn't tell you whether traditional
23 redistricting principles have been followed then;
24 right? Because you have to look at more than that?

25 A Well, it's a quantifiable first step and

1 oftentimes is all you need.

2 Q When you say "oftentimes all you need," what
3 do you mean?

4 A Well, if a plan just willy-nilly splits
5 counties and cities, it's problematic and generally
6 speaking would not comply with traditional
7 redistricting principles.

8 Q But you'd have to look at a particular --

9 A Again, if it happens -- we have plenty of
10 examples of those kinds of plans drawn in the 1990s --
11 right? -- in Georgia and elsewhere.

12 Q And can you explain a little bit about what
13 you mean about examples of plans drawn in the '90s like
14 that?

15 A Well, they were just plans that were drawn
16 that were crazy looking, you know. And I'm not just
17 talking about minority majority districts -- other
18 plans. And now it's not so easy to do that without
19 objections being raised.

20 I'm not specifically speaking about Georgia.
21 Other states as well.

22 Q And I just want to understand. So when you
23 talk about crazy-looking plans in the '90s, are you
24 talking about district boundaries that are very
25 unusually shaped but might otherwise keep counties

1 whole? Is that what you're referring to?

2 A It's possible. It's possible.

3 Q And you're not opining --

4 A That's not what I'm referring to in terms of
5 District 6, which is clearly a reasonably shaped plan
6 that adheres to traditional redistricting principles.

7 I mean, you just -- you couldn't really argue
8 otherwise. I'm sure you will try, but you've got a
9 steep hill to climb.

10 Q And in your report, you're not opining that
11 the 2021 enacted plan consists of the crazy district --
12 crazy-looking districts you've been referring to in
13 this part of your testimony; right?

14 A I think the incursion of District 14 into
15 Cobb County is an issue, but it's not a truly
16 crazy-looking district because it follows the state
17 boundaries all the way up to the Tennessee line. So in
18 that sense, it's okay.

19 Q Any other districts that you believe have
20 some unusual features on them as part of your opinion
21 here?

22 A That's the most glaring. I'm not prepared to
23 opine on other parts of the state because, if nothing
24 else, I just made the decision to accept 6 of the 14
25 districts that the Legislature adopted in the enacted

1 plan.

2 Q So you're not offering an opinion about other
3 districts in the state and them being unusual looking
4 or strange looking; right?

5 A No. Not at this point, no.

6 Q That brings us to paragraph 68. And you
7 reference -- really I guess what you're doing, as I
8 read it, is comparing illustrative plan CD 6 to 2021
9 plan CD 6.

10 Is that a fair assessment of paragraph 68?

11 A Yes.

12 Q And you criticize the enacted plan for mixing
13 Appalachian North Georgia with urban/suburban Metro
14 Atlanta.

15 Do you see that language?

16 A Yes. I think I just sort of referenced that
17 in previous comments this morning.

18 Q And you'd agree that the illustrative plan
19 mixes urban/suburban Metro Atlanta with rural areas of
20 Georgia down to Columbus; right?

21 A Right. It can happen.

22 Q And you'd agree that the --

23 A And because these are congressional plans,
24 it's even more likely that it would happen because
25 you -- you know, you're working with populations that

1 have 765,000 people. So it's not just in Georgia, it's
2 in any state you're going to sometimes have to include
3 urban and rural voters in a congressional plan no
4 matter whether you like doing so or not.

5 Q And you'd agree illustrative District 10
6 mixes Appalachian North Georgia with parts of the black
7 belt in Eastern Georgia; right?

8 A It does. It does.

9 Q And you reference Douglas, Fulton, and
10 Fayette Counties being core Metro Atlanta counties in
11 the Atlanta Regional Commission in paragraph 68.

12 Do you see that?

13 A Yeah.

14 Q And is Coweta County also a core Metro
15 Atlanta county under the Atlanta Regional Commission?

16 A I'm not sure. There are 11 counties and I'm
17 not sure Coweta is part of it.

18 Q Are you aware that Coweta County touches
19 Douglas, Fulton, and Fayette Counties?

20 A Yes.

21 Q And you put Coweta County in a district with
22 Columbus, Georgia, on the illustrative plan; right?

23 A I did, yes. Is that bad?

24 Q I guess what I'm trying to understand is
25 you're criticizing the enacted plan for mixing

1 Appalachian North Georgia with urban/suburban Metro
2 Atlanta, but then on the illustrative plan, you're
3 doing the same thing on District 3 connects areas of
4 urban/suburban Metro Atlanta to Columbus. It connects
5 areas of the Appalachia North Georgia to the black
6 belt.

7 I guess what I'm trying to understand is
8 what's the distinction with Congressional District 6
9 and 14 on the enacted plan that's different from the
10 illustrative plan?

11 A Well, first of all, Cobb County is split four
12 ways in your -- in the enacted plan. And I just split
13 it three ways in the illustrative plan. So there's an
14 unnecessary split involved there. And also it includes
15 a much larger base population. I mean, we can go back
16 and look at the numbers, but I'm fairly confident that
17 the population that's placed in District 14 in Cobb
18 County is much larger than the smaller area that I've
19 identified that would go into District 3 along the
20 Paulding County line.

21 We could look at those numbers. I could be
22 incorrect about that, but I'm fairly certain that the
23 population difference would be pretty significant,
24 bringing a large chunk of Cobb County into District 14.

25 Q So let's turn next to paragraph 72. You

1 reference the split into Fayette County to help ensure
2 that CD 13 is not overpopulated.

3 Do you see that?

4 A Yes.

5 Q And you say that the dividing line "generally
6 follows the municipal boundary of Tyrone."

7 Do you see that?

8 A Yes.

9 Q It doesn't follow the municipal boundary
10 exactly though, does it?

11 A No. Because I had to get it to zero.

12 Q Okay.

13 A I had to get District 13 to zero. I mean, as
14 we've already -- I'm not really adding in black
15 population into District -- into District 6. What I'm
16 doing is taking some population out of Fayette County
17 to get District 13 down to plus or minus one person.
18 That's all.

19 Q Okay. So at some point --

20 A But I did have to split a precinct and
21 actually maybe include part of Tyrone to get -- to get
22 it to balance out to plus or minus one person.

23 There definitely would be other ways to do it
24 though. This seemed to be the cleanest way because
25 once you're really zoomed out, you hardly even know

1 that District 6 goes into Fayette County.

2 Q Well, I just want to look briefly at Exhibit
3 M-4 of your report. That's on page 183. So as you can
4 see -- your declaration Exhibit M-4.

5 Do you see that?

6 A Yeah.

7 Q And this is a report called "Communities of
8 Interest (Condensed)"; is that right?

9 A Yeah. That's an automated Maptitude report.

10 Q And scrolling down to the first column,
11 District 6, Tyrone, and it indicates I believe on this
12 report that about 29.9 percent of the population of
13 Tyrone is in District 6; is that right?

14 A Yes.

15 Q And then on the next page, the remaining
16 70 -- a little bit more than 70 percent of Tyrone is in
17 District 13; right?

18 A Right.

19 Q So when you say you're generally following
20 the municipal boundary of Tyrone, how are you ending up
21 with a 70/30 split of the city?

22 A Well, it goes into the city but around the
23 city. I followed the Tyrone boundary. I believe.

24 Q Okay. But 70 percent of the population is in
25 District 13 and roughly 30 percent is in District 6;

1 right?

2 A Right. I had to go into the town of Tyrone
3 to get population into District 6. And I did it in a
4 reasonable fashion. But I did put part of Tyrone in
5 District 6.

6 But to reiterate, there would be other ways
7 to accomplish the same objective. As you know, if you
8 go back and look at the illustrative plan that was done
9 for the preliminary injunction, I went into the middle
10 part of Fayette County to get the population and
11 actually get to plus or minus one person for
12 District 13.

13 Q Let's go back to your report and then to the
14 chart on Figure 15, page 30 of the report.

15 So can you just walk me through what
16 Figure 15 shows?

17 A Well, it shows that under the 2021 plan,
18 about half of the black population, black voting age
19 population is in a majority black district, and over
20 80 percent, 82.5 percent of the white population is in
21 a majority white district.

22 In drawing the illustrative plan, I was able
23 to narrow the gap somewhat so that now, under the
24 illustrative plan, over 57 percent of the black voting
25 age population would be in a majority black district;

1 whereas, there would be a reduction for the
2 non-Hispanic white VAP in the majority white districts
3 from 82 percent to three quarters, 75 percent.

4 So the end result is that more of the black
5 voting age population would have an opportunity to
6 elect the candidate of choice. And I'm just using that
7 generically. I'm not a statistician -- under the
8 illustrative plan than under the 2021 plan.

9 Q And did you do any analysis of how much of
10 these changes are due solely to the black population in
11 Cobb County being placed into the illustrative
12 District 6?

13 A No.

14 Q So you can't say for certain where this
15 little more than seven-point movement happened, just
16 that it happened in the state as a whole between the
17 two plans?

18 A Well, in the state as a whole. But clearly
19 it would involve a significant black population in Cobb
20 County.

21 Q So the --

22 A Because that's where a large part of
23 District 6 is located.

24 Q So the change of black residents in Cobb
25 County in District 6 would have a large portion of

1 this, but you can't identify specifically how much of
2 this is due to particular district changes; is that
3 right?

4 A That's true. It's a statewide analysis.

5 Q Looking down to paragraph 78, you say that
6 the compactness scores "are about the same" and "within
7 the norm in Georgia and elsewhere."

8 Do you see that?

9 A Yes.

10 Q And so I think we talked about earlier,
11 there's not an objectively noncompact compactness
12 score; is that right?

13 A That is correct.

14 Q Okay. And so when you say the "norm," you're
15 just referring to general ranges based on other states'
16 compactness scores in their districts; is that right?

17 A Well, based on my experience and there was
18 this study that was produced in 2012 by the software
19 firm -- software company "Osovakia" -- I don't know if
20 I'm saying that right -- that looked at congressional
21 districts nationwide, and there are some very low
22 scores, of course, in that report; and, thus, the
23 illustrative plan and the 2021 plan for that matter are
24 significantly better than many congressional districts
25 in the country --

1 Q And --

2 A -- on compactness.

3 Q Thank you. And that compactness study you
4 relied on, you don't have any similar study for
5 districts drawn after the 2020 census results; right?

6 A I do not, but I have no reason to think that
7 the national figures would change very much compared to
8 the way they were in 2012. But they would change from
9 state to state.

10 Q Moving down to Figure 13 on page 32, you have
11 a comparison of the compactness scores of various
12 plans.

13 Do you see that?

14 A Yes.

15 Q Okay. And you'd agree that on the Reock
16 score, the illustrative plan has a slightly lower mean
17 score and a .03 lower low Reock score than the 2021
18 plan; right?

19 A Yes. Meaningless difference.

20 Q And when would a difference in compactness
21 scores on the Reock standard be meaningful if those are
22 meaningless differences?

23 A I've seen lots of districts, including the
24 State House plan and State Senate plan, that are in the
25 teens, maybe, or low 20s compactness.

1 And on Polsby-Popper in the enacted plan for
2 House and Senate, there are some that are in the teens
3 and even low teens. I believe the low score in the
4 2021 House plan, I think, for Polsby-Popper is .11.

5 So these plans, the 2021 plan and the
6 illustrative plan, just looking at Reock and
7 Polsby-Popper scores, passed with flying colors. Both
8 plans.

9 And it's no surprise that they're very close
10 because the illustrative plan includes six plans
11 exactly -- six districts exactly as drawn by the
12 General Assembly. Of course, if I decided just to draw
13 a statewide illustrative plan that made no changes or
14 that made more changes to the congressional plan that
15 was enacted, perhaps I could enhance the scores. But I
16 tried as best I could to incorporate the districts that
17 were drawn by the State.

18 Q And in Figure 13, you just reported total
19 scores or mean scores and low scores. You didn't
20 report the compactness scores for each district on the
21 illustrative plan versus the 2021 plan; right?

22 A I did report them in the appendix -- or in
23 the exhibits.

24 Q But you didn't report them here in the
25 written portion of your report; right?

1 A No. Well, no. I just referenced the
2 exhibits that has that information broken out by --
3 district by district.

4 Q And so getting back to my earlier question,
5 you said that a difference of .01 and .03 on the Reock
6 scores was a meaningless difference.

7 At what level would a difference in Reock
8 scores between two plans become meaningful?

9 A I don't know. I just know that .03 is
10 meaningless Reock and there's also a .03 difference
11 that works to the benefit of the illustrative plan in
12 terms of Polsby-Popper.

13 So if you look at the low scores, for
14 example, you see that it's actually not -- it's
15 actually -- it's not .03, it's .02. Polsby-Popper's
16 low score for the illustrative plan is .18 and the
17 Polsby-Popper score for 2021 plan is .16.

18 So I would not argue that there's that much
19 of a difference either. There's .02.

20 Q So --

21 A It's getting in the teens, but it's not in
22 the single-digit teens. That's where it starts getting
23 problematic for Polsby-Popper. Not -- I'm sorry --
24 into the single digits. Excuse me.

25 Q Okay. So just so I understand then, your

1 view of the meaningfulness of these differences is you
2 know that these variations between illustrative and
3 2021 are meaningless, but you don't have a particular
4 level where you would consider a meaningful difference
5 for compactness scores between two points in this --

6 A Yeah. And it does vary, you know, state by
7 state. For Nebraska, a Polsby-Popper score of .16
8 would be pretty bad unless maybe right along the
9 Missouri River. Maybe not that problematic. But
10 elsewhere, it would be. So it depends on the state.

11 Georgia's got some really problematic terrain
12 here and there in the mountains and along the coast.
13 So I have no problem with a low score of .16, even
14 though other, lesser plans are superior with a low
15 score of .18.

16 Q And looking at Figure 14, you'd agree that
17 the number of split counties is the same between the
18 illustrative plan and the 2021 plan and the number of
19 county splits is a difference of three between those
20 two plans; right?

21 A Right.

22 Q And paragraph 83, you have a paragraph about
23 socioeconomic characteristics at various levels.

24 Do you see that?

25 A Yes.

1 You skipped over the other portion of
2 Figure 14 there where the illustrative plan is superior
3 to the 2021 plan for VTD splits -- split cities and
4 towns and city/town splits. I'm just pointing that
5 out.

6 And now we'll go to your question.

7 Q And to be clear, as you said earlier, Georgia
8 doesn't tend to focus on municipality splits when
9 drawing its redistricting plans; right?

10 A Well, it's not -- it's not emphasized in the
11 general guidelines posted on the website. I mean, it
12 could be, because Georgia tends to have frequent
13 annexations. But then precincts change also. So I'm
14 not sure what the rationale is there. Because as I was
15 saying, everyone knows what town they live in. But no
16 one -- or hardly anyone including me knows what
17 precinct they're in. Maybe the polling place, but the
18 precinct, no.

19 MS. KHANNA: No one except Mr. Tyson.

20 THE WITNESS: Except Mr. Tyson, right. And
21 Abha probably knows too.

22 BY MR. TYSON:

23 Q All right. So let's see if we can land the
24 plane here.

25 Paragraph 83 you talk about socioeconomic

1 characteristics; is that right?

2 A Yeah.

3 Q And the ACS data that you're referencing that
4 you prepared charts for is based on, ultimately,
5 county-level data. Do I have that right? Or is it
6 based on some other level of geography?

7 A No, it's county-level data from the 2021 ACS,
8 which was released in September of 2022.

9 Q And in paragraph 85, it appears that the
10 only -- the only statement you're making about these
11 data is that non-Hispanic whites maintain higher levels
12 of socioeconomic well-being.

13 Is that what you say in paragraph 85?

14 A I think so in this case. First of all, I'm
15 not the expert on historical or cultural factors or
16 socioeconomic factors in this case. And usually I
17 produce these charts and they end up getting used for
18 making a point about Senate Factor 5. And they could
19 be used for that purpose here, but I'm not going to be
20 testifying on that.

21 Q Okay. And that's what I wanted to just make
22 sure, that while you're offering these particular
23 facts, you're not offering any opinions about the ACS
24 data that you're reporting in paragraphs 83, 84, and
25 85; right?

1 A Nothing beyond that, no.

2 (Exhibit 4 Marked for Identification.)

3 BY MR. TYSON:

4 Q Mr. Cooper, I have one other quick exhibit to
5 show you and then I think we're going to be finished
6 here. Just a couple of quick questions on that. I'm
7 going to mark Exhibit 4 which is the supplemental
8 declaration that you submitted in January of 2022 in
9 this case.

10 Do you see that on my screen?

11 A Yes.

12 Q Okay. So I'm going to go down to
13 paragraph 4. And in this, you're responding to
14 Mr. Morgan's report in the preliminary injunction
15 proceedings; right?

16 A Right.

17 Q And you make a statement in paragraph 4 that
18 "Core retention is largely irrelevant when an election
19 plan is challenged on the grounds that it violates
20 Section 2."

21 Do you see that?

22 A I do.

23 Q Do you consider core retention of districts
24 to be a traditional redistricting principle?

25 A In the background, perhaps. But it's a

1 highly problematic metric because it's based on the
2 number -- it's based on the district number.

3 So Mr. Morgan has identified an issue, he
4 thinks, with the fact that CD 6 as I've drawn in the
5 illustrative plan only includes, I don't know,
6 something like 3 percent of the old CD 6. But had I
7 numbered CD 6 11 and numbered 6 -- and numbered 11, 6,
8 the percentage would go up into the 30s, I think it is.
9 I'm not looking at it. But it just -- you know, it
10 doesn't -- it doesn't mean a lot, really, because the
11 district numbers make a difference. But it's good
12 information to have in the background.

13 Q So do I understand, then, that it's
14 information you would generally have while you're
15 drawing a plan but that a particular report about core
16 retention will change based on district numbers?

17 Is that right?

18 A Yeah. Exactly. Exactly.

19 Q Okay. And when you're drawing a
20 redistricting plan, would you generally look at
21 district cores as part of your process of drawing a new
22 district plan or not?

23 A Well, I look at old district lines or
24 district lines in the existing plan, as I've done here.
25 I've got a hundred percent core retention in 6 of the

1 14 districts.

2 MR. TYSON: Mr. Cooper, if you don't mind, if
3 we could just take a five-minute break and let me go
4 over my notes. And I think I'm probably finished for
5 today.

6 (Off the record 1:17 p.m. to 1:21 p.m.)

7 MR. TYSON: So, Mr. Cooper, I appreciate your
8 time this morning. I don't have any further questions
9 for you. Thank you.

10 THE WITNESS: Thank you.

11 EXAMINATION

12 BY MS. KHANNA:

13 Q I have just a couple of questions for you,
14 Mr. Cooper.

15 If we could go back to paragraph 67 on
16 page 26 of your report. And I believe here you write
17 that the -- that "These three levels of geography --
18 counties, municipalities, VTDs -- together with census
19 tracts and census block groups are the best way to
20 achieve a quantifiable measure of the extent to which a
21 redistricting plan respects communities of interest."

22 Did I read that correctly?

23 A Yes.

24 Q And I believe Mr. Tyson asked you some
25 questions about that. And I think he asked are these

1 the only ways to measure quantifiably or objective
2 communities of interest.

3 Is that -- is it your understanding that
4 those are the only quantifiable metrics of communities
5 of interest?

6 A No. They are excellent ways if you're just a
7 plan drawer.

8 Q So --

9 A But there are other -- there would be other
10 ways. A social scientist, sociologist would have other
11 quantifiable measures, no doubt.

12 Q So if we go back to Figure 13 on page 25 of
13 your report, there's a dark black line in the district
14 map reflected here.

15 What is that black line?

16 A That is the boundary for the Atlanta MSA, the
17 29 counties that are in the Atlanta MSA as defined by
18 the Census Bureau. And those counties reflect a shared
19 community of interest as it relates to economic and
20 transportation issues.

21 Q And was that your subjective determination?

22 A Well, no. That was the -- that was the
23 objective determination of the Census Bureau or the
24 Office of Planning and Budget in consultation with the
25 Census Bureau. I think it's a combined effort.

1 Q So that is another objective or quantifiable
2 way of looking at communities of interest?

3 A Yes.

4 Q And that MSA reflects, you said, both
5 economic and transportation considerations; is that
6 right?

7 A With commuting patterns primarily, yes.

8 Q And those are also objective and quantifiable
9 data points that the Office of, you said, Management
10 and Budget relied on or used in defining that area?

11 A Yes. And there are several in this case in
12 Georgia. And then, of course, Georgia has its own
13 regional commissions, one of which is the 11 core
14 counties.

15 Q There are also socioeconomic data. That's
16 also quantifiable, is it not?

17 A It is. It is for sure.

18 Q Do you think that I have -- have we discussed
19 the range of potential quantifiable data that could
20 reflect communities of interest?

21 A Perhaps not. Perhaps not. Because
22 sociologists could no doubt look at a number of factors
23 and quantify that using regression analysis and that
24 sort of thing. So there would be other ways to do
25 that.

1 But I have, in my discretion, just basically
2 the information about county population and MSA
3 boundaries and municipal boundaries that and that sort
4 of thing -- VTD boundaries.

5 Q So in paragraph 67 when you said "the best
6 way to achieve quantifiable measure," were you saying
7 that the only way to achieve a quantifiable measure of
8 communities of interest is these levels of geography?

9 A No. I guess I'm just implying the best way
10 for a plan drawer to understand how their plan stacks
11 up against other plans in terms of a community of
12 interest, which really is centered more on political
13 subdivisions, but it's not the whole picture -- it's
14 not the whole picture.

15 MS. KHANNA: And I have no further questions.

16 MR. TYSON: I don't either.

17 THE COURT REPORTER: Mr. Tyson, E-tran for
18 you?

19 MR. TYSON: E-tran will be great. Yes.

20 THE COURT REPORTER: And, Ms. Khanna, E-tran
21 for you?

22 MS. KHANNA: Yes, please.

23 (Signature reserved.)

24 (Deposition concluded 1:26 p.m.)

25

CERTIFICATE OF REPORTER

STATE OF NORTH CAROLINA)

COUNTY OF MECKLENBURG)

I, MEREDITH R. SCHRAHEK, hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me to the best of my ability and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

I further certify that 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.
This, the 24th day of February, 2023.



MEREDITH R. SCHRAHEK, RPR, CCR 3040

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1 ABHA KHANNA, ESQ.
akhanna@elias.law

3 February 24, 2023

4 RE: Pendergrass vs Raffensperger
February 14, 2023 - William Cooper - Job No 5700239

6 The above-referenced transcript is available for
7 review.

8 (The witness/You) should read the testimony to
9 verify its accuracy. If there are any changes,
10 (the witness/you) should note those with the reason
11 on the attached Errata Sheet.

12 (The witness/You) should, please, date and sign the
13 Errata Sheet and email to the deposing attorney as well as
14 to Veritext at litsup-ga@veritext.com and copies will
15 be emailed to all ordering parties.

16 It is suggested that the completed errata be returned 30
17 days from receipt of testimony, as considered reasonable
18 under Federal rules*, however, there is no Florida statute
19 to this regard.

20 If the witness fails to do so, the transcript may be used
21 as if signed.

22 Yours,

23 Veritext Legal Solutions

24
25 *Federal Civil Procedure Rule 30(e)/Florida Civil Procedure
Rule 1.310(e).

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Under penalties of perjury, I declare that I have
read the foregoing document and that the facts
stated in it are true.

(WITNESS NAME)

DATE

[01 - 2021]

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Georgia Code

Title 9, Chapter 11

Article 5, Section 9-11-30

(e) Review by witness; changes; signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph (1) of subsection (f) of this Code section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed. If the deposition is not reviewed and signed by the witness within 30 days of its submission to him or her, the officer shall sign it and state on the record that the deposition was not reviewed and signed by the deponent within 30 days. The deposition may then be used as fully as though signed unless, on a motion to suppress under paragraph (4) of subsection (d) of Code

Section 9-11-32, the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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

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

COAKLEY PENDERGRASS et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official
capacity as the Georgia Secretary of State,
et al.,

Defendants.

CIVIL ACTION FILE
NO. 1:21-CV-05339-SCJ

DECLARATION OF WILLIAM S. COOPER

WILLIAM S. COOPER, acting in accordance with 28 U.S.C. § 1746, Federal Rule of Civil Procedure 26(a)(2)(B), and Federal Rules of Evidence 702 and 703, does hereby declare and say:

I. INTRODUCTION

1. My name is William S. Cooper. I have a B.A. in Economics from Davidson College. As a private consultant, I serve as a demographic and redistricting expert for the Plaintiffs.

2. I have testified at trial as an expert witness on redistricting and demographics in federal courts in about 50 voting rights cases since the late 1980s. Over 25 of the cases led to changes in local election district plans. Five of the cases resulted in changes to statewide legislative boundaries: *Rural West Tennessee*

EXHIBIT

1

African-American Affairs Council, Inc. v. McWherter, No. 92-cv-2407 (W.D. Tenn.); *Old Person v. Brown*, No. 96-cv-0004 (D. Mont.); *Bone Shirt v. Hazeltine*, No. 01-cv-3032 (D.S.D.); *Alabama Legislative Black Caucus v. Alabama*, No. 12-cv-691 (M.D. Ala.); and *Thomas v. Reeves*, No. 18-cv-441 (S.D. Miss.). In *Bone Shirt v. Hazeltine*, the court adopted the remedial plan I developed.

3. I served as the *Gingles* 1 expert for two post-2010 local-level Section 2 cases in Georgia, *Georgia State Conference of NAACP v. Fayette County Board of Commissioners*, No. 11-cv-123 (N.D. Ga.), and *Georgia State Conference of NAACP v. Emanuel County Board of Commissioners*, No. 16-cv-21 (S.D. Ga.). In both cases, the parties settled on redistricting plans that I developed (with input from the respective defendants). In the latter part of the decade, I served as the *Gingles* 1 expert in three additional Section 2 cases in Georgia, which were all voluntarily dismissed in advance of the 2020 elections: *Georgia State Conference of NAACP v. Gwinnett County Board of Commissioners*, No. 16-cv-2852 (N.D. Ga.); *Thompson v. Kemp*, No. 17-cv-1427 (N.D. Ga.); and *Dwight v. Kemp*, No. 18-cv-2869 (N.D. Ga.).

4. In 2022, I testified as an expert in redistricting and demographics in six cases challenging district boundaries under Section 2 of the Voting Rights Act: *Caster v. Merrill*, No. 21-1356-AMM (N.D. Ala.); *Alpha Phi Alpha Fraternity v. Raffensperger*, No. 21-05337-SCJ (N.D. Ga.); *Pendergrass v. Raffensperger*, No. 21-

05339-SCJ (N.D. Ga.); *NAACP v. Baltimore County*, No.21-cv-03232-LKG (D. Md.); *Christian Ministerial Alliance v. Hutchinson*, No. 4:19-cv-402-JM (E.D. Ark.); and *Robinson v. Ardoin*, No. 3:22-cv-00211-SDD-SDJ (M.D. La.). I also testified at trial this year as an expert on demographics in *NAACP v. Lee*, No. 4:21cv187-MW/MAF (N.D. Fla.), a case involving recent changes to Florida’s election law.

5. Since the release of the 2020 Census data, three county commission-level plans I developed as a private consultant have been adopted by local governments, in San Juan County, Utah; Bolivar County, Mississippi; and Washington County, Mississippi. In addition, a school board plan I developed was adopted by the Jefferson County, Alabama Board of Education (*Stout v. Jefferson County*).

6. My redistricting experience is further documented in **Exhibit A**.

7. I am being compensated at a rate of \$150.00 per hour. No part of my compensation is dependent upon the conclusions that I reach or the opinions that I offer.

A. Purpose of Declaration

8. The attorneys for the Plaintiffs in this case asked me to determine whether the African American¹ population in Georgia is “sufficiently large and

¹ In this declaration, “African American” refers to persons who are Single Race Black or Any Part Black (i.e., persons of two or more races and some part Black), including Hispanic Black. In some instances (e.g., for historical comparisons), numerical or percentage references identify Single Race Black as “SR Black” and Any Part Black as “AP Black.” Unless noted otherwise, “Black” means AP Black. It is my understanding that following the U.S. Supreme Court decision in

geographically compact”² to allow for the creation of an additional majority-Black congressional district in the Atlanta metropolitan area.

9. **Exhibit B** describes the sources and methodology I have employed in the preparation of this report and the Illustrative Plan. In short, I used the Maptitude for Redistricting software program as well as data and shapefiles from the U.S. Census Bureau and the Georgia Legislative and Congressional Reapportionment Office, among other sources.

B. Expert Conclusions

10. The Black population in metropolitan Atlanta is sufficiently numerous and geographically compact to allow for the creation of an additional majority-Black congressional district anchored in Cobb, Douglas, and Fulton Counties (CD 6 in the Illustrative Plan) consistent with traditional redistricting principles.

11. The additional majority-Black congressional district can be merged into the enacted 2021 Plan without making changes to six of the 14 districts: CD 1, CD 2, CD 5, CD 7, CD 8, and CD 12 are unaffected.

Georgia v. Ashcroft, 539 U.S. 461 (2003), the “Any Part” definition is an appropriate Census classification to use in most Section 2 cases.

² This is the first *Gingles* precondition. See *Thornburg v. Gingles*, 478 U.S. 30 (1986).

C. Organization of Declaration

12. The remainder of this declaration is organized as follows: **Section II** reviews state-level and Metro Atlanta 1990–2020 demographics, as defined by the 29-county Atlanta-Sandy Springs-Alpharetta MSA.³ **Section III** provides maps and population statistics for the 2012 Benchmark Plan and the enacted 2021 Plan. **Section IV** presents the Illustrative Plan that I have prepared, based on the 2020 Census, which includes an additional majority-Black district in Metro Atlanta.

II. DEMOGRAPHIC PROFILE

A. Georgia: 2010 to 2020

13. According to the 2020 Census, Georgia has a total population of 10,711,908 persons—up by 1.02 million since 2010.

³ In this declaration, Metro Atlanta refers to the 29-county Atlanta-Sandy Springs-Alpharetta Metropolitan Statistical Area (“MSA”). It includes the counties of Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spalding, and Walton.

MSA is an abbreviation for “metropolitan statistical area.” Metropolitan statistical areas are defined by the U.S. Office of Management and Budget and reported in historical and current census data produced by the U.S. Census Bureau. As the Census Bureau has explained, “[m]etropolitan statistical areas consist of the county or counties (or equivalent entities) associated with at least one urbanized area of at least 50,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties.” Source: <https://www.census.gov/programs-surveys/metro-micro/about/glossary.html>.

14. **Figure 1** reveals that Georgia’s population growth since 2010 can be attributed entirely to gains in the overall minority population.

Figure 1
Georgia: Population by Race and Ethnicity (2010 Census to 2020 Census)

	2010 Population	Percent	2020 Population	Percent	2010–2020 Change (Persons)	2010–2020 Change (Percent)
Total Population	9,687,653	100.00%	10,711,908	100.00%	1,024,255	10.57%
NH White*	5,413,920	55.88%	5,362,156	50.06%	-51,764	-0.96%
Total Minority Population	4,273,733	44.12%	5,349,752	49.94%	1,076,019	25.18%
Latino	853,689	8.81%	1,123,457	10.49%	269,768	31.60%
NH Black*	2,910,800	30.05%	3,278,119	30.60%	367,319	12.62%
NH Asian*	311,692	3.22%	475,680	4.44%	163,988	52.61%
NH Hawaiian and Pacific Islander	5,152	0.05%	6,101	0.06%	949	18.42%
NH American Indian and Alaska Native*	21,279	0.22%	20,375	0.19%	-904	-4.25%
NH Other*	19,141	0.20%	55,887	0.52%	36,746	191.98%
NH Two or More Races*	151,980	1.57%	390,133	3.65%	238,153	156.70%
SR Black	2,950,435	30.46%	3,320,513	31.00%	370,078	12.54%
AP Black	3,054,098	31.53%	3,538,146	33.03%	484,048	15.85%

*Single race, non-Hispanic

15. Between 2010 and 2020, the Black population in Georgia increased by 484,048 persons. By contrast, during the same decade, the non-Hispanic White (“NH White”) population fell by 51,764 persons.

16. Georgia's Black population, as a share of the overall statewide population, increased between 2010 and 2020, from 31.53% in 2010 to 33.03% in 2020.

17. Non-Hispanic Whites are a razor-thin majority of the state's 2020 population (50.06%). Black Georgians account for one-third (33.03%) of the population and comprise the largest minority population, followed by Latinos (10.49%).

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B. Georgia: Voting Age and Citizen Voting Age

18. As shown in **Figure 2**, African Americans in Georgia constitute a slightly smaller percentage of the voting age population (“VAP”) than the total population. According to the 2020 Census, Georgia has a total VAP of 8,220,274 persons, of whom 2,607,986 (31.73%) are AP Black. The NH White VAP is 4,342,333 (52.82%).

Figure 2
Georgia: 2020 Voting Age and 2021 Estimated Citizen Voting Age
Populations by Race and Ethnicity⁴

	2020 VAP (Persons)	2020 VAP (Percent)	2021 CVAP (Percent)
Total	8,220,274	100.00%	100.0%
NH White	4,342,333	52.82%	55.7%
Total Minority	3,877,941	47.18%	44.3%
Latino	742,918	9.04%	5.9%
SR Black	2,488,419	30.27%	31.4%
AP Black	2,607,986	31.73%	33.3%

19. The rightmost column in Figure 2 reveals that both the Black and NH White populations comprise a higher percentage of the citizen voting age population

⁴ To prepare this table, I relied on the PL 94-171 redistricting file issued by the Census Bureau; Table S2901 of the 1-Year 2021 American Community Survey (“ACS”), available at <https://data.census.gov/cedsci/table?q=S2901&g=0400000US13&tid=ACSST1Y2021.S2901>; and the Public Use Microdata Sample of the 1-Year 2021 ACS, available at <https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2021&vv=AGEP%2800,18%3A99%29&cv=RACBLK%281%29&r v=ucgid,CIT%281,2,3,4,%29&wt=PWGTP&g=0400000US13>.

(“CVAP”) than the corresponding voting age population, owing to higher non-citizenship rates among other minority populations.

20. According to estimates from the 1-Year 2021 American Community Survey (“ACS”), African Americans represent 33.3% of the statewide CVAP—about 1.5 percentage points higher than the 2020 AP Black VAP. The NH White CVAP is 55.7%—nearly three percentage points higher than NH White VAP in the 2020 Census.

21. The Black CVAP in Georgia is poised to go up this decade. According to the 1-Year 2021 ACS, Black citizens of all ages represent 34.45% of all citizens.⁵

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⁵ Source: <https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2021&vv=AGEP&cv=RACBLK%281%29&rv=ucgid,CIT%281,2,3,4%29&wt=PWGTP&g=0400000US13>.

C. Black Population as a Component of Total Population: 1990 to 2020

1. Georgia

22. As shown in **Figure 3**, Georgia's Black population has increased significantly in absolute and percentage terms since 1990, from about 27% in 1990 to 33% in 2020. Over the same time period, the percentage of the population identifying as NH White has dropped from 70% to 50%.

Figure 3
Georgia: Population by Race and Ethnicity (1990 Census to 2020 Census)

	1990 Population	Percent	2000 Population	Percent	2010 Population	Percent	2020 Population	Percent
Total Population	6,478,216	100.00%	8,186,453	100.00%	9,687,653	100.0%	10,711,908	100.00%
NH White	4,543,425	70.13%	5,128,661	62.65%	5,413,920	55.88%	5,362,156	50.06%
Total Minority Population	1,934,791	29.87%	3,057,792	37.35%	4,273,733	44.12%	5,349,752	49.94%
Latino	108,922	1.68%	435,227	5.32%	853,689	8.81%	1,123,457	10.49%
Black*	1,746,565	26.96%	2,393,425	29.24%	3,054,098	31.53%	3,538,146	33.03%

*SR Black in 1990; AP Black 2000–2020

23. Since 1990, the Black population has more than doubled: from about 1.75 million to 3.54 million, an increase that is the equivalent of the populations of more than two congressional districts. The NH White population has also increased, but at a much slower rate: from 4.54 million to 5.36 million, amounting to an increase of only about 18% over the three-decade period.

2. Metro Atlanta

24. **Exhibit C** is a Census Bureau-produced map showing boundaries for the Atlanta MSA, along with other metropolitan and micropolitan areas in Georgia.

25. **Figure 4** demonstrates that the key driver of population growth in Georgia this century has been Metro Atlanta, led in no small measure by a large increase in the Black population.

Figure 4
Metro Atlanta: Population by Race and Ethnicity (1990 Census to 2020 Census)

	1990 Population	Percent	2000 Population	Percent	2010 Population	Percent	2020 Population	Percent
Total Population	3,082,308	100.00%	4,263,438	100.00%	5,286,728	100.00%	6,089,815	100.00%
NH White	2,190,859	71.08%	2,576,109	60.42%	2,684,571	50.78%	2,661,835	43.71%
Total Minority Population	891,449	28.92%	1,687,329	39.58%	2,602,157	49.22%	3,427,980	56.29%
Latino	58,917	1.91%	270,655	6.35%	547,894	10.36%	730,470	11.99%
Black*	779,134	25.28%	1,248,809	29.29%	1,776,888	33.61%	2,186,815	35.91%

*SR Black in 1990; AP Black 2000–2020

26. According to the 1990 Census, the area that today comprises the 29-county MSA was 25.28% Black, increasing to 35.91% in 2020. Since 2000, the Black population in Metro Atlanta has climbed by 75%: from 1.25 million in 2010 to 2.19 million in 2020.

27. According to the 2020 Census, a majority of Metro Atlanta residents are non-White, while NH Whites comprise 43.71% of the Metro Atlanta population. This is a major shift compared to the previous decade; in 2010, NH Whites represented 50.78% of the Metro Atlanta population.

28. According to the 2020 Census, the 11 core counties comprising the Atlanta Regional Commission (“ARC”) service area⁶ account for more than half (54.7%) of the statewide Black population. After expanding the region to include the 29 counties in the Atlanta MSA (including the 11 ARC counties), Metro Atlanta encompasses 61.81% of the state’s Black population.

29. **Exhibit D** breaks down Black population changes from 2010 to 2020 by county for each of the 29 counties in Metro Atlanta.

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⁶ Source: <https://atlantaregional.org/atlanta-region/about-the-atlanta-region>.

30. **Figure 5** shows that the population gain in Metro Atlanta between 2010 and 2020 amounted to 803,087 persons—greater than the population of one of the state’s congressional districts—with more than half of the gain coming from an increase in the Black population, which increased by 409,927 (or 23.07%). Meanwhile, over the same decade, the NH White population in Metro Atlanta fell by 22,736 persons.

Figure 5
Metro Atlanta: Population by Race and Ethnicity (2010 Census to 2020 Census)

	2010 Number	Percent	2020 Number	Percent	2010–2020 Change (Persons)	2010–2020 Change (Percent)
Total Population	5,286,728	100.00%	6,089,815	100%	803,087	15.19%
NH White*	2,684,571	50.78%	2,661,835	43.7%	-22,736	-0.85%
Total Minority Population	2,602,157	49.22%	3,427,980	56.3%	825,823	31.74%
Latino	547,894	10.36%	730,470	12.0%	182,576	33.32%
NH Black*	1,684,178	31.86%	2,019,208	33.16%	335,030	19.89%
NH Asian*	252,616	4.78%	397,009	6.52%	144,393	57.16%
NH Hawaiian and Pacific Islander*	2,075	0.04%	2,386	0.04%	311	14.99%
NH American Indian and Alaska Native*	10,779	0.20%	10,562	0.17%	-217	-2.01%
NH Other*	13,749	0.26%	39,254	0.64%	25,505	185.50%
NH Two or More Races*	126,322	2.39%	229,091	3.76%	102,769	81.35%
SR Black	1,712,121	32.39%	2,048,212	33.63%	336,091	19.63%
AP Black	1,776,888	33.61%	2,186,815	35.91%	409,927	23.07%

*Single race, non-Hispanic

31. As shown in **Figure 6**, according to the 2020 Census, the 29-county MSA has a total VAP of 4,654,322 persons, of whom 1,622,469 (34.86%) are AP Black. The NH White VAP is 2,156,625 (46.34%).

Figure 6
Metro Atlanta: 2020 Voting Age and 2021 Estimated Citizen Voting Age Populations by Race and Ethnicity⁷

	2020 VAP (Persons)	2020 VAP (Percent)	2021 CVAP (Percent)
Total	4,654,322	100.00%	100.00%
NH White	2,156,625	46.34%	49.8%
Total Minority	2,426,643	53.66%	50.2%
Latino	487,286	10.47%	6.6%
SR Black	1,541,370	33.12%	34.6%
AP Black	1,622,469	34.86%	N/A

32. According to estimates from the 1-Year 2021 ACS, SR African Americans represent 34.6% of the CVAP in Metro Atlanta—about 1.5 percentage points higher than the 2020 SR Black VAP. The NH White CVAP is 49.8%, about 3.5 percentage points higher than the NH White VAP in the 2020 Census.

33. Despite the significant Black population growth in Metro Atlanta, the region includes just three majority-Black districts under the 2021 Plan—CD 4, CD 5, and CD 13—the same number the region has had for the past two decades.

⁷ To prepare this table, I relied on the PL 94-171 redistricting file issued by the U.S. Census Bureau and Table S2901 of the 1-Year 2021 ACS, available at <https://data.census.gov/table?q=S2901&g=310XX00US12060>. The Census Bureau does not publish a citizenship estimate for the AP Black CVAP at the MSA level.

34. As shown in **Figure 7**, over the two decades since the last majority-Black district (CD 13) was drawn, Metro Atlanta’s population has grown by 1.8 million, with the Black population up by 938,006.

Figure 7
29-County MSA (Metro Atlanta): 2000 to 2020 Population Change

	2000 Population (Persons)	2000 Population (Percent)	2020 Population (Persons)	2020 Population (Percent)	2000–2020 Change (Persons)	2000–2020 Change (Percent)
Total Population	4,263,438	100.00%	6,089,815	100.00%	1,826,377	42.84%
NH White	2,576,109	60.42%	2,661,835	43.71%	85,726	3.33%
Total Minority Population	1,687,329	39.58%	3,427,980	56.29%	1,740,651	103.16%
Latino	270,655	6.35%	730,470	11.99%	459,815	169.89%
AP Black	1,248,809	29.29%	2,186,815	35.91%	938,006	75.11%

35. Given the dramatic increase in Georgia’s Black population in Metro Atlanta during this century, the obvious focal point for determining whether an additional majority-Black district can be created in the state is indeed Metro Atlanta. And, as shown below, a new majority-Black district can readily be created in and around Cobb, Douglas, and Fulton Counties.

III. 2012 BENCHMARK PLAN AND 2021 PLAN

A. 2012 Benchmark Plan

36. **Exhibit E** contains a map packet depicting the 2012 Benchmark Plan, with corresponding 2010 Census statistics, prepared by the Georgia Legislative & Congressional Reapportionment Office (“GLCRO”).

37. **Exhibit F** is a table that I prepared reporting 2020 Census population statistics for the 2012 Plan, as well as CVAP estimates from the Census Bureau’s 2015–2019 Special Tabulation.⁸

B. 2021 Plan

38. **Exhibit G** contains a map packet depicting the 2021 Plan, with corresponding 2020 Census statistics, prepared by GLCRO.

39. Additional 2021 Plan information regarding compactness scores, county splits, municipal splits, and VTD⁹ splits is reported for comparison with the Illustrative Plan described in the next section.

40. The 2021 Plan reduces CD 6’s BVAP from 14.6% under the 2012 Benchmark Plan to 9.9%. This decrease occurred in an area that has experienced significant growth in the Black population since the 2010 Census. Notably, the area is adjacent to two majority-Black districts (CD 4 and CD 13) with Black citizen voting age populations (“BCVAP”) in the 60% range under both the Benchmark 2012 Plan and the 2021 Plan.

41. According to the 2020 Census, the BVAP in the (by then overpopulated) Benchmark 2012 CD 13 was 62.65%. Under the 2021 Plan, the BVAP in CD 13

⁸ Source: <https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>.

⁹ “VTD” is a U.S. Census Bureau term; VTDs generally correspond to precincts. Statewide, in 2020, there were 2,698 VTDs in Georgia.

jumps to 66.75%. Indeed, the BVAP in CD 13 has steadily increased over the past two decades. According to the 2010 Census, under the then-overpopulated Benchmark 2006 Plan, the BVAP in CD 13 stood at 55.70%.

42. As shown in **Figure 8**, based on the 2020 Census, the combined Black population in Cobb, Fulton, Douglas, and Fayette Counties is 807,076 persons, more than necessary to constitute an *entire* congressional district—or, put differently, a majority in two congressional districts.

Figure 8
Four-County Area: 2010 Census to 2020 Census Population and Black Population Changes

	2020 Population	2020 Black Population	2010–2020 Population Change	2010–2020 Black Population Change	Black Population Change as Percentage of Total Change
Cobb	766,149	223,116	78,071	42,151	53.99%
Douglas	144,237	74,260	11,834	20,007	169.06%
Fayette	119,194	32,076	12,627	9,578	75.85%
Fulton	1,066,710	477,624	146,129	60,732	41.56%
Total	2,096,290	807,076	248,661	132,468	53.27%

43. More than half (53.27%) of the total population increase in the four counties since 2010 can be attributed to the increase in the Black population. Building off this growth, the Illustrative Plan described in the next section shows how an additional majority-Black congressional district can be drawn in the area encompassing Cobb, Fulton, Douglas, and Fayette Counties—with no meaningful

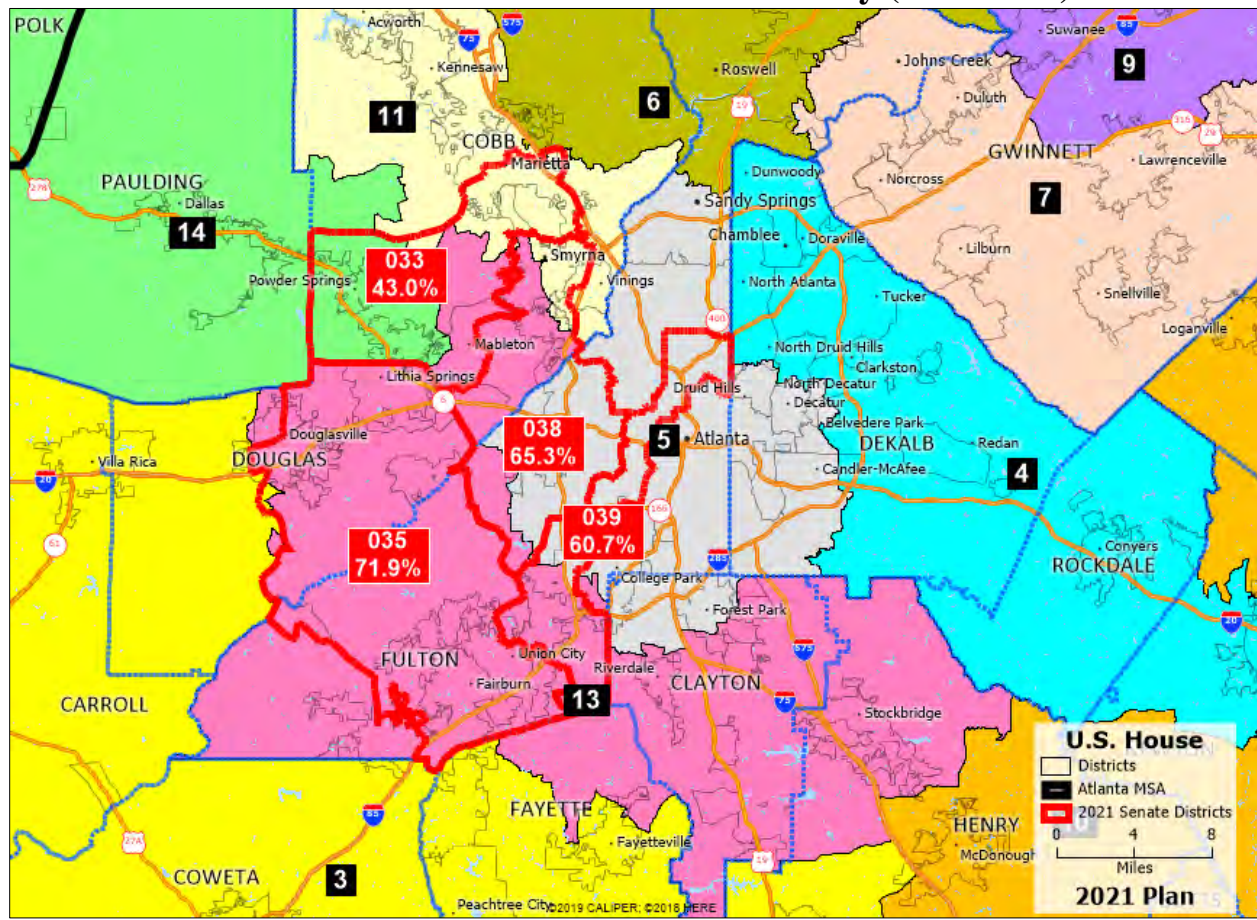
impact on compactness and fewer splits of political subdivisions (i.e., counties, VTDs, and municipalities).

44. Indeed, that an additional majority-Black district can readily be drawn in this four-county area is confirmed by the composition of newly enacted Georgia State Senate districts in Metro Atlanta. The enacted 2021 Senate Plan includes three majority-Black districts that encompass parts of western Fulton County, southern Cobb County, and eastern Douglas County, and a fourth racially diverse Senate district in Cobb County.

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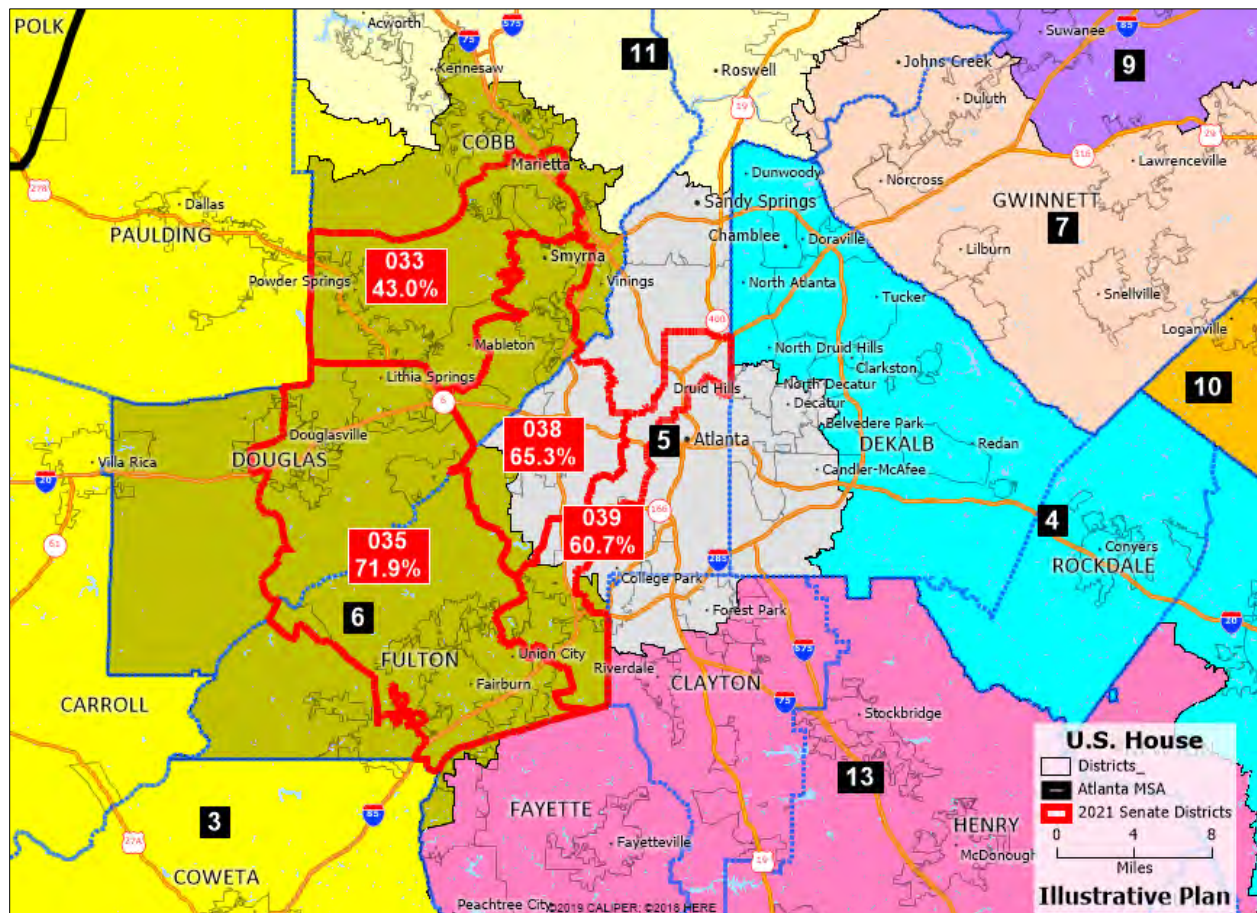
45. With respect to ideal district population size, four Senate districts are exactly the equivalent of one congressional district, given that 56 (the number of Senate districts) divided by 14 (the number of congressional districts) equals four. And, as shown in **Figure 9** below, there is ample room to create an additional majority-Black congressional district in the three-county area generally defined by three majority-Black and one racially diverse Senate districts in the enacted 2021 Senate Plan: SD 39 (approximately 61% BVAP), SD 35 (72% BVAP), SD 38 (60% BVAP), and Cobb County SD 42 (43% BVAP).

Figure 9
2021 Plan with Partial Senate Plan Overlay (Red Lines)



46. **Figure 10** below is a preview of the Illustrative Plan described in the next section. Note how majority-Black Illustrative CD 6 closely aligns with the four Senate districts displayed in Figure 8, and then extends west to include all of Douglas County, south to include all of southern Fulton County, and north into racially diverse areas of Cobb County.

Figure 10
Illustrative Plan with Partial Senate Plan Overlay (Red Lines)



IV. Illustrative Plan

A. Traditional Redistricting Principles

47. The Illustrative Plan I have prepared demonstrates that the Black population is sufficiently numerous and geographically compact to allow for the creation of an additional majority-Black congressional district in Metro Atlanta.

48. The Illustrative Plan adheres to traditional redistricting principles, including population equality, compactness, contiguity, respect for political subdivision boundaries, respect for communities of interest, and the non-dilution of minority voting strength.

49. I drew the Illustrative Plan to follow, to the extent possible, county boundaries. Where counties are split to comply with one-person, one-vote requirements, I have generally used whole 2020 Census VTDs as sub-county components. Where VTDs are split, I have followed census block boundaries that are aligned with roads, natural features, municipal boundaries, census block groups, and post-2020 Census county commission districts.

50. In drafting the Illustrative Plan, I sought to minimize changes to the 2021 Plan while abiding by all of the traditional redistricting principles listed above. I balanced all of these considerations, and no one factor predominated in my drawing of the Illustrative Plan.

51. The result leaves intact six congressional districts in the enacted plan, modifying only eight districts in the 2021 Plan to create an additional majority-Black district (Illustrative CD 6) encompassing all of Douglas County and parts of Cobb, Fayette, and Fulton Counties. The eight districts that are changed under the Illustrative Plan are CD 3, CD 4, CD 6, CD 9, CD 10, CD 11, CD 13, and CD 14.

52. The districts in the Illustrative Plan are also contiguous.

53. As shown in **Figure 11**, the Illustrative Plan abides by the one-person, one-vote principle. Like the 2021 Plan, population deviations in the Illustrative Plan are plus or minus one person from the ideal population size of 765,136.

Figure 11
Illustrative Plan Population Summary

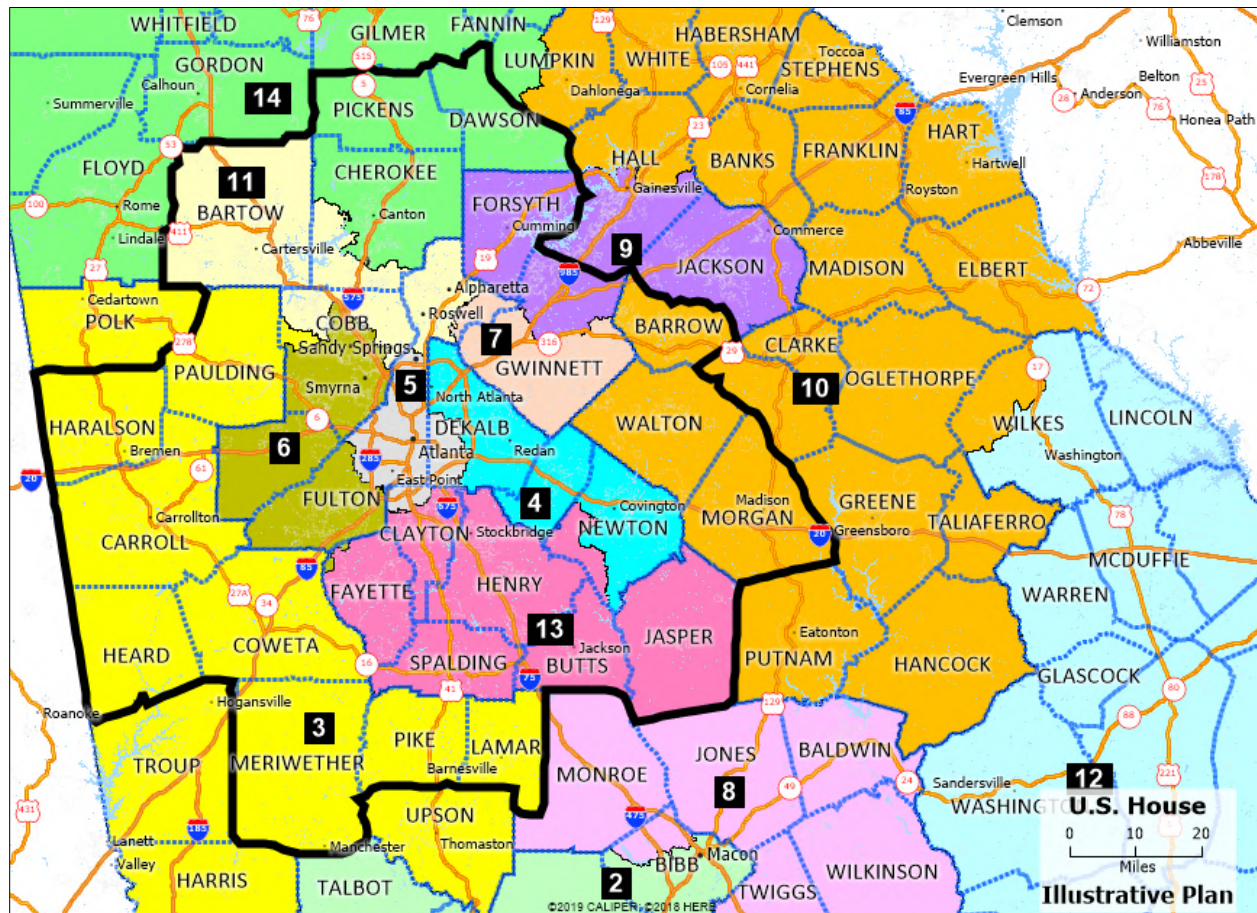
District	Population	Deviation	AP Black	% AP Black	Latino	% Latino	NH White	% NH White
1	765,137	1	230,783	30.16%	59,328	7.75%	440,636	57.59%
2	765,137	1	393,195	51.39%	45,499	5.95%	305,611	39.94%
3	765,135	-1	166,096	21.71%	49,935	6.53%	517,659	67.66%
4	765,136	0	410,019	53.59%	87,756	11.47%	212,004	27.71%
5	765,137	1	392,822	51.34%	56,496	7.38%	273,819	35.79%
6	765,137	1	396,891	51.87%	108,401	14.17%	225,985	29.54%
7	765,137	1	239,717	31.33%	181,851	23.77%	225,905	29.52%
8	765,136	0	241,628	31.58%	54,850	7.17%	443,123	57.91%
9	765,136	0	94,059	12.29%	128,393	16.78%	429,340	56.11%
10	765,137	1	118,199	15.45%	61,244	8.00%	548,312	71.66%
11	765,137	1	110,368	14.42%	81,466	10.65%	492,121	64.32%
12	765,136	0	294,961	38.55%	43,065	5.63%	398,843	52.13%
13	765,135	-1	404,963	52.93%	71,377	9.33%	253,135	33.08%
14	765,135	-1	44,445	5.81%	93,796	12.26%	595,663	77.85%
Total	10,711,908	N/A	3,538,146	33.03%	1,123,457	10.49%	5,362,156	50.06%

54. **Exhibit I-1** contains additional voting age and citizen voting age summaries by district.

B. Illustrative Plan Overview

55. The map in **Figure 12** depicts Metro Atlanta with an overlay of the Illustrative Plan. CD 6, the additional majority-Black district, is anchored in Cobb, Douglas, and Fulton Counties, along with a small part of Fayette County.

Figure 12
Illustrative Plan: Metro Atlanta



57. **Exhibit I-1** is a table reporting 2020 Census population statistics for the Illustrative Plan, as well as CVAP estimates from the Census Bureau’s 2016–2020 Special Tabulation.¹⁰

58. **Exhibit I-2** is a set of maps depicting the Illustrative Plan, zooming in on each of the 14 districts under the Illustrative Plan. Districts in the 2021 Plan that do not change are displayed with red line boundaries.

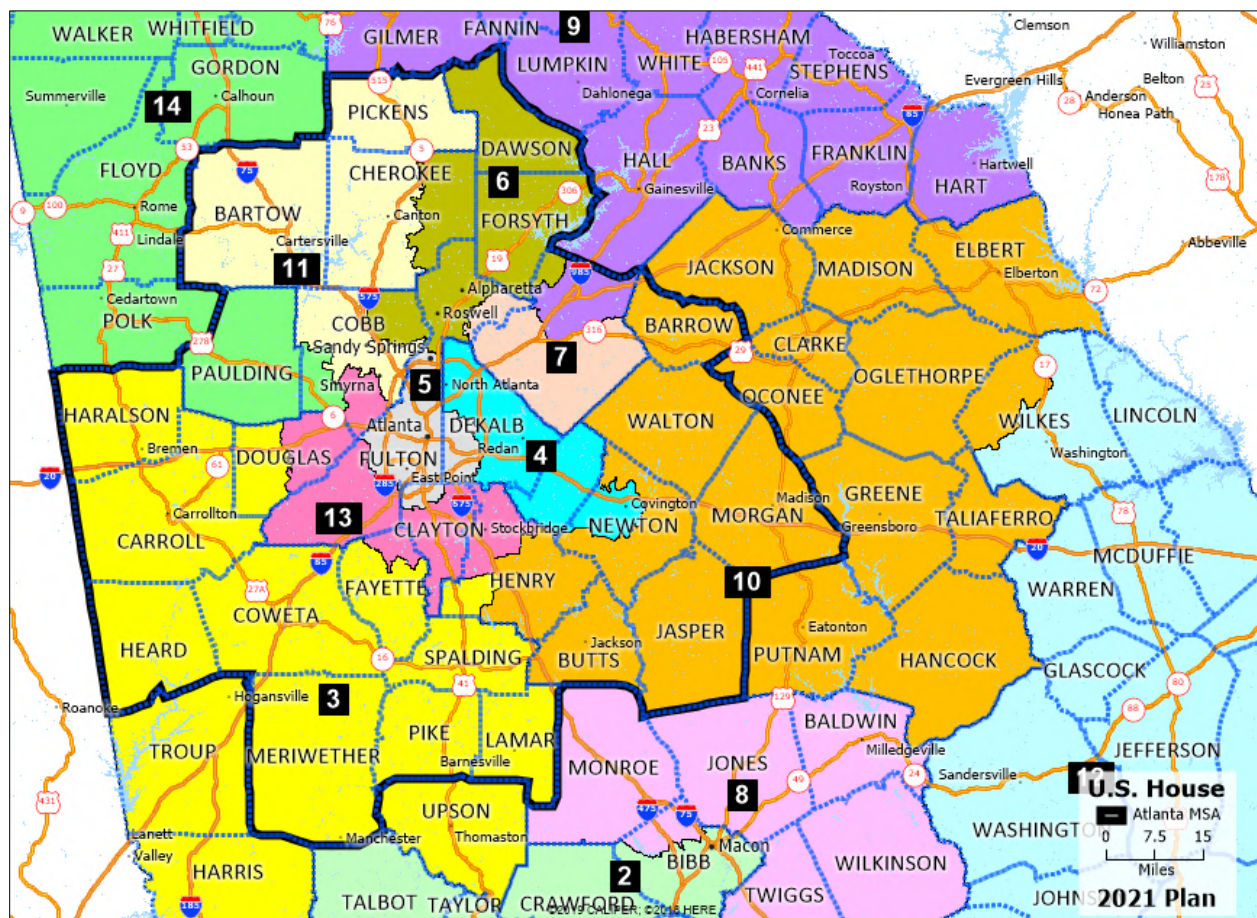
59. **Exhibit I-3** details district assignments by county population in the Illustrative Plan.

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¹⁰ In the summary population exhibits by plan that I have prepared, I also report the NH DOJ Black CVAP metric. The NH DOJ Black CVAP category includes voting age citizens who are either NH SR Black or NH Black and White. An “Any Part Black CVAP” category that would include Black Hispanics cannot be calculated from the 5-Year ACS Census Bureau Special Tabulation. The estimates are disaggregated from the block group level as published by the U.S. Census Bureau. The most current data available is from the 2016–2020 Special Tabulation, with a survey midpoint of July 1, 2018. Source: <https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>. The 2016–2020 estimates reflect 2020 Census population distribution. The 2017–2021 CVAP estimates will be released by the Census Bureau in early 2023.

60. For comparison, the map in **Figure 13** depicts Metro Atlanta and surrounding counties with an overlay of the 2021 Plan. The 2021 Plan splits majority-non-White Cobb County into parts of four districts: from south to north, CD 13, CD 14, CD 11, and CD 6. Southwest Cobb County is in CD 14, which stretches all the way to the suburbs of Chattanooga.

Figure 13
2021 Plan: Metro Atlanta



61. **Exhibit J-1** is a higher resolution of the **Figure 10** map. **Exhibit J-2** is a statewide map that displays all 14 districts under the 2021 Plan.

62. For comparison, **Exhibit K-1** is a table reporting 2020 Census population statistics for the 2021 Plan, as well as CVAP estimates from the Census Bureau's 2016–2020 Special Tabulation.

63. **Exhibit K-2** is a set of maps depicting the 2021 Plan, zooming in on each of the 14 districts under the 2021 Plan.

64. **Exhibit K-3** details district assignments by county population in the 2021 Plan.

C. Communities of Interest

65. In the development of the Illustrative Plan, I prioritized keeping counties whole and minimizing unnecessary county splits. For example, as Illustrative CD 6 (which includes just three Cobb County splits) makes clear, there is no reason to split Cobb County into four pieces (i.e., four splits), as under the 2021 Plan.

66. I also endeavored to keep municipalities intact and avoid splitting VTDs (in that order of priority) wherever possible. In many instances there are geographic conflicts between municipality lines and VTD lines, such that keeping one geographic level whole might require splitting the other.

67. These three levels of geography—counties, municipalities, and VTDs—together with census tracts and census block groups are the best way to achieve a quantifiable measure of the extent to which a redistricting plan respects communities of interest.

68. Going beyond these quantifiable measures of communities of interest, it simply makes more sense to anchor Illustrative CD 6 in the western part of Metro Atlanta. As the Illustrative Plan demonstrates, CD 6 can be drawn in a compact fashion that keeps Atlanta-area urban/suburban/exurban voters together. In sharp contrast, the 2021 Plan—its treatment of Cobb County in particular—inexplicably mixes Appalachian North Georgia with urban/suburban Metro Atlanta. In some redistricting plans, it might be necessary to mix urban and rural voters in a sprawling congressional district. But that is not the case here: Cobb County can be combined in a congressional district with all or part of Douglas, Fulton, and Fayette Counties, all of which are core Metro Atlanta counties under the Atlanta Regional Commission map. Illustrative CD 6 thus unites Georgians in the Metro Atlanta area with shared interests and concerns.

69. In Cobb County, the Illustrative Plan assigns all but noncontiguous zero-population areas of Marietta to CD 6. Kennesaw (population 33,036) is split between CD 6 and CD 11.¹¹ (See **Exhibit M-3**.) By contrast, the 2021 Plan divides populated areas of Marietta (population 60,972) between CD 6 and CD 11 and also divides

¹¹ I placed the east end of Kennesaw in Illustrative CD 6—namely, two whole VTDs (Big Shanty 01 and Kennesaw 1A) and part of another (Kennesaw 3A). Big Shanty 01 contains a group of noncontiguous populated blocks surrounded by the oddly shaped Kennesaw 3A; I split Kennesaw 3A following two census-defined block group boundaries.

populated areas of Smyrna (population 55,663) between CD 11 and CD 13. (See **Exhibit M-4.**)

70. Douglas County is entirely in CD 6 in the Illustrative Plan. The 2021 Plan divides Douglas County between CD 6 and CD 11, splitting Douglasville (population 34,650). (See **Exhibit M-4.**)

71. In Fulton County, the Illustrative Plan and the 2021 Plan follow the boundary of CD 5, which is identical in both plans.

72. Illustrative CD 6 extends into Fayette County to ensure that CD 13 is not overpopulated. In order to meet zero-deviation requirements, the dividing line between Illustrative CD 6 and Illustrative CD 13 generally follows the municipal boundary of Tyrone (population 7,658). (See **Exhibit M-3.**) By contrast, in Fayette County, the 2021 Plan divides populated areas of Fayetteville (population 18,957) between CD 13 and CD 3. (See **Exhibit M-4.**)

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D. BVAP and BCVAP by District

73. Notably, the Illustrative Plan does not reduce the number of preexisting majority-Black districts in the 2021 Plan. For reference, **Figure 14** compares BVAP and BCVAP under the Illustrative Plan and the 2021 Plan. The eight districts that change are identified with a bolded font.

Figure 14
BVAP and BCVAP Comparison: Illustrative Plan and 2021 Plan

District*	Illustrative Plan				2021 Plan		
	% BVAP	% NH BCVAP	% NH DOJ BCVAP		% BVAP	% NH BCVAP	% NH DOJ BCVAP
1	28.17%	29.16%	29.67%		28.17%	29.16%	29.67%
2	49.29%	49.55%	50.001%		49.29%	49.55%	50.001%
3	20.47%	19.64%	20.02%		23.32%	22.53%	22.86%
4	52.77%	55.62%	56.37%		54.52%	57.71%	58.46%
5	49.60%	51.64%	52.35%		49.60%	51.64%	52.35%
6	50.23%	50.18%	50.98%		9.91%	9.72%	10.26%
7	29.82%	31.88%	32.44%		29.82%	31.88%	32.44%
8	30.04%	30.46%	30.76%		30.04%	30.46%	30.76%
9	11.66%	11.29%	11.74%		10.42%	10.03%	10.34%
10	14.31%	15.09%	15.39%		22.60%	22.11%	22.56%
11	13.67%	12.91%	13.48%		17.95%	17.57%	18.30%
12	36.72%	36.60%	37.19%		36.72%	36.60%	37.19%
13	51.13%	49.64%	50.34%		66.75%	66.36%	67.05%
14	5.17%	4.80%	5.19%		14.28%	13.19%	13.71%

*Bold font identifies districts that are changed from the 2021 Plan configuration.

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E. VAP by Race in Majority-Black and Majority-White Districts

74. As shown in **Figure 15**, only about half (49.96%) of Black voters in Georgia reside in a majority-Black congressional district under the 2021 Plan. Under the Illustrative Plan, 57.48% of the Black VAP would reside in a majority-Black district—still far lower than the corresponding 75.50% NH White VAP residing in majority-White districts.

Figure 15
Same-Race VAP in Majority-Black and Majority-White Districts: 2021 Plan and Illustrative Plan

Redistricting Plan	% Black VAP in Majority-Black Districts	%NH White VAP in Majority-White Districts	Difference (% Black VAP minus % NH White VAP)
2021 Plan	49.96%	82.47%	-32.51%
Illustrative Plan	57.48%	75.50%	-18.01%

F. Online Interactive Map

75. The Illustrative Plan can be viewed in detail and analyzed on the Dave's Redistricting website at the following link: <https://davesredistricting.org/join/acc0684b-36b9-4b85-8049-ffb67a63aa57>.

76. For comparison, the 2021 Plan can also be viewed and analyzed on the Dave's Redistricting website at the following link: <https://davesredistricting.org/join/385b8d71-ecdb-4767-80d9-ebd75b8d8c63>.

77. Alternatively, the Illustrative Plan can be viewed with a red-line overlay of the 2021 Plan on the Maptitude Online website at the following link: <https://online.caliper.com/mas-874-drp-290-ujr/maps/lahchqqg000g8gqi3qx9>.

G. Supplemental Plan Information and Comparisons

78. Compactness scores for the Illustrative Plan are about the same as the 2021 Plan—and within the norm in Georgia and elsewhere.¹² **Exhibit L-1** contains compactness scores generated by Maptitude for the Illustrative Plan. Corresponding scores for the 2012 Benchmark Plan and 2021 Plan are in **Exhibit L-2** and **Exhibit L-3**.

[Intentionally Blank]

¹² See, for example, the comparison of compactness scores across all states by the geospatial firm Azavea in their white paper titled *Redrawing the Map on Redistricting: 2012 Addendum*, available at: https://redistricting.azavea.com/assets/pdfs/Azavea_Redistricting-White-Paper-Addendum-2012_sm.pdf.

79. **Figure 13** (condensed from the Exhibit L series) is a summary, reporting the mean averages and low scores for the Reock¹³ and Polsby-Popper¹⁴ metrics under both the Illustrative Plan and the 2021 Plan.

Figure 13
Compactness Comparison: Illustrative Plan, 2012 Benchmark, and 2021 Plan

	Reock		Polsby-Popper	
	Mean	Low	Mean	Low
Illustrative Plan	.43	.28	.27	.18
2012 Benchmark	.45	.33	.26	.16
2021 Plan	.44	.31	.27	.16

80. **Exhibit M-1** contains a county and VTD split report generated by Maptitude for the Illustrative Plan. **Exhibit M-2** and **Exhibit M-3** are corresponding split reports for the 2012 Benchmark Plan and the 2021 Plan. **Exhibit M-4** contains the Illustrative Plan’s municipal split report for the 531 incorporated cities and towns. **Exhibit M-5** and **Exhibit M-6** are corresponding split reports for the 2012 Benchmark Plan and the 2021 Plan.

¹³ As the Maptitude for Redistricting software documentation (authored by the Caliper Corporation) explains, “[t]he Reock test is an area-based measure that compares each district to a circle, which is considered to be the most compact shape possible. For each district, the Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district. The measure is always between 0 and 1, with 1 being the most compact. The Reock test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.”

¹⁴ As the Maptitude for Redistricting software documentation (authored by the Caliper Corporation) explains, “[t]he Polsby-Popper test computes the ratio of the district area to the area of a circle with the same perimeter: $4\pi\text{Area}/(\text{Perimeter}^2)$. The measure is always between 0 and 1, with 1 being the most compact. The Polsby-Popper test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.”

81. **Figure 14** summarizes county, 2020 VTD, and municipal splits under the Illustrative Plan, the 2012 Benchmark Plan, and the 2021 Plan.

Figure 14
County, VTD, and Municipal Splits: Illustrative Plan, 2012 Benchmark, and 2021 Plan (All Districts)

	Split Counties*	County Splits*	2020 VTD Splits*	Split Cities/Towns[#]	City/Town Splits*
Illustrative Plan	15	18	43	37	78
2012 Benchmark Plan	16	22	43	40	85
2021 Plan	15	21	46	43	91

*Excludes unpopulated areas

[#]Out of 531 municipalities (calculated by subtracting the number of whole cities in the Maptitude report from 531)

82. The Illustrative Plan and 2021 Plan both split 15 counties. But, as Figure 14 reveals, the Illustrative Plan is superior across the other four categories: **(1)** total county splits (counting multiple splits, i.e., unique county-district combinations in a single county)—18 vs. 21 splits; **(2)** 2020 VTD splits (counting multiple splits and excluding unpopulated areas)—43 vs. 46 splits, **(3)** split municipalities (out of 531)—37 vs. 43 splits; and **(4)** total municipal splits (excluding unpopulated areas)—78 vs. 91 splits.

H. County and Municipal Socioeconomic Characteristics

83. For background on socioeconomic characteristics by race and ethnicity at the state, MSA, county, municipal, and unincorporated-community levels in

Georgia, I have prepared charts based on the 5-Year 2015–2019 ACS. That data is available online.¹⁵

84. In addition, I have prepared charts and reproduced the U.S. Census Bureau’s Table S0201¹⁶ statistical summaries of socioeconomic characteristics from the 1-Year 2021 ACS for Georgia, the two most populous MSAs in the state (Atlanta and Augusta-Richmond County), and the four most populous counties of the Atlanta MSA (Cobb, Dekalb, Fulton, and Gwinnett). Statistics for other, less populous counties are not available in the S0201 series.

85. These charts and data tables document that socioeconomic disparities by race exist at the county and municipal levels throughout Georgia. In an almost unbroken fashion, NH Whites maintain higher levels of socioeconomic well-being.

V. CONCLUSION

86. The Black population in Metro Atlanta is sufficiently numerous and geographically compact to allow for the creation of an additional majority-Black congressional district consistent with traditional redistricting principles, anchored in

¹⁵ The county-level data is available at http://www.fairdata2000.com/ACS_2015_19/Georgia; the community-level data is available at http://www.fairdata2000.com/ACS_2015_19/Georgia/00_Places_2500+; and the state-, metro counties-, and MSA-level data is available at http://www.fairdata2000.com/ACS_2021/Georgia.

¹⁶ The full S0201 data is available at https://data.census.gov/cedsci/table?text=s0201&t=001%3A005%3A451&g=04000000US13,13%240500000_05000000US13067,13089,13121,13135_310XX00US12060,12260&y=2021.

Cobb, Fulton and Douglas Counties, without reducing the number of majority-Black districts in the 2021 Plan.

87. The Illustrative Plan creates an additional majority-Black district in Metro Atlanta, where the Black population has increased by 938,006 persons since 2000—accounting for 75.1% of the statewide Black population increase this century—and where, according to the Governor’s Office of Planning and Budget, the Black population will continue to increase over the course of this decade.¹⁷

###

¹⁷ Source: <https://opb.georgia.gov/census-data/population-projections>.

I reserve the right to continue to supplement my report in light of additional facts, testimony, and/or materials that might come to light.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 5, 2022

A handwritten signature in black ink that reads "Bill Cooper". The signature is written in a cursive, slightly slanted style.

WILLIAM S. COOPER

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT A

November 30, 2022

William S. Cooper
P.O. Box 16066
Bristol, VA 24209
276-669-8567
bcooper@msn.com

Summary of Redistricting Work

I have a B.A. in Economics from Davidson College in Davidson, North Carolina.

Since 1986, I have prepared proposed redistricting maps of approximately 750 jurisdictions for Section 2 litigation, Section 5 comment letters, and for use in other efforts to promote compliance with the Voting Rights Act of 1965. I have analyzed and prepared election plans in over 100 of these jurisdictions for two or more of the decennial censuses – either as part of concurrent legislative reapportionments or, retrospectively, in relation to litigation involving many of the cases listed below.

From 1986 to 2022, I have prepared election plans for Section 2 litigation in Alabama, Connecticut, Florida, Georgia, Louisiana, Maryland, Mississippi, Missouri, Montana, Nebraska, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, Washington, and Wyoming.

Post-2020 Redistricting Experience

Since the release of the 2020 Census, three county commission-level plans I developed as a private consultant have been adopted by local governments in San Juan County, Utah, Bolivar County, Miss., and Washington County, Miss. In addition, a school board plan I developed was adopted by the Jefferson County, Alabama Board of Education (*Stout v. Jefferson County*).

In 2022, I have testified at trial in seven Sec. 2 lawsuits: Alabama (Congress), Arkansas (Supreme and Appellate Courts), Florida (voter suppression), Georgia (State

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House, State Senate, and Congress), Louisiana (Congress) and Maryland (Baltimore County Commission).

2010s Redistricting Experience

I developed statewide legislative plans on behalf of clients in nine states (Alabama, Connecticut, Florida, Georgia, Kentucky, Mississippi, South Carolina, Texas, and Virginia), as well as over 150 local redistricting plans in approximately 30 states – primarily for groups working to protect minority voting rights. In addition, I have prepared congressional plans for clients in eight states (Alabama, Florida, Georgia, Louisiana, Maryland, Ohio, Pennsylvania, South Carolina, and Virginia).

In March 2011, I was retained by the Sussex County, Virginia Board of Supervisors and the Bolivar County, Mississippi Board of Supervisors to draft new district plans based on the 2010 Census. In the summer of 2011, both counties received Section 5 preclearance from the U.S. Department of Justice (DOJ).

Also in 2011, I was retained by way of a subcontract with Olmedillo X5 LLC to assist with redistricting for the Miami-Dade County, Florida Board of Commissioners and the Miami-Dade, Florida School Board. Final plans were adopted in late 2011 following public hearings.

In the fall of 2011, I was retained by the City of Grenada, Mississippi to provide redistricting services. The ward plan I developed received DOJ preclearance in March 2012.

In 2012 and 2013, I served as a redistricting consultant to the Tunica County, Mississippi Board of Supervisors and the Claiborne County, Mississippi Board of Supervisors.

In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Voting Rights Act Section 2 violation, a seven single-member district plan

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that I developed for the Latino plaintiffs. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In *Pope v. Albany County* (N.D.N.Y. Mar. 24, 2015), the court approved, as a remedy for a Section 2 violation, a plan drawn by the defendants, creating a new Black-majority district. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In 2016, two redistricting plans that I developed on behalf of the plaintiffs for consent decrees in Section 2 lawsuits in Georgia were adopted (*NAACP v. Fayette County, Georgia* and *NAACP v. Emanuel County, Georgia*).

In 2016, two federal courts granted summary judgment to the plaintiffs based in part on my *Gingles 1* testimony: *Navajo Nation v. San Juan County, Utah* (C.D. Utah 2016) and *NAACP v. Ferguson-Florissant School District, Missouri* (E. D. Mo. August 22, 2016).

Also in 2016, based in part on my analysis, the City of Pasco, Washington admitted to a Section 2 violation. As a result, in *Glatt v. City of Pasco* (E.D. Wash. Jan. 27, 2017), the court ordered a plan that created three Latino majority single-member districts in a 6 district, 1 at-large plan.

In 2018, I served as the redistricting consultant to the Governor Wolf interveners at the remedial stage of *League of Women Voters, et al. v. Commonwealth of Pennsylvania*.

In August 2018, the Wenatchee City Council adopted a hybrid election plan that I developed – five single-member districts with two members at-large. The Wenatchee election plan is the first plan adopted under the Washington Voting Rights Acts of 2018.

In February 2019, a federal court ruled in favor of the plaintiffs in a Section 2 case regarding Senate District 22 in Mississippi, based in part on my *Gingles 1* testimony in *Thomas v. Bryant* (S.D. Ms. Feb 16, 2019).

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In the summer of 2019, I developed redistricting plans for the Grand County (Utah) Change of Form of Government Study Committee.

In the fall of 2019, a redistricting plan I developed for a consent decree involving the Jefferson County, Alabama Board of Education was adopted *Traci Jones, et al. v. Jefferson County Board of Education, et al.*

In May 2020, a federal court ruled in favor of the plaintiffs in a Section 2 case in *NAACP et al. v. East Ramapo Central School District, NY*, based in part on my *Gingles* 1 testimony. In October 2020, the federal court adopted a consent decree plan I developed for elections to be held in February 2021.

In May and June of 2020, I served as a consultant to the City of Quincy, Florida – the Defendant in a Section 2 lawsuit filed by two Anglo voters (*Baroody v. City of Quincy*). The federal court for the Northern District of Florida ruled in favor of the Defendants. The Plaintiffs voluntarily dismissed the case.

In the summer of 2020, I provided technical redistricting assistance to the City of Chestertown, Maryland.

I am currently a redistricting consultant and expert for the plaintiffs in *Jayla Allen v. Waller County, Texas*. I testified remotely at trial in October 2020.

Since 2011, I have served as a redistricting and demographic consultant to the Massachusetts-based Prison Policy Initiative for a nationwide project to end prison-based gerrymandering. I have analyzed proposed and adopted election plans in about 25 states as part of my work.

In 2018 (Utah) and again in 2020 (Arizona), I have provided technical assistance to the Rural Utah Project for voter registration efforts on the Navajo Nation Reservation.

Post-2010 Demographics Experience

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My trial testimony in Section 2 lawsuits usually includes presentations of U.S. Census data with charts, tables, and/or maps to demonstrate socioeconomic disparities between non-Hispanic Whites and racial or ethnic minorities.

I served as a demographic expert for plaintiffs in four state-level voting cases related to the Covid-19 pandemic (South Carolina, Alabama, and Louisiana) and state court in North Carolina.

I have also served as an expert witness on demographics in non-voting trials. For example, in an April 2017 opinion in *Stout v. Jefferson County Board of Education* (Case no.2:65-cv-00396-MHH), a school desegregation case involving the City of Gardendale, Ala., the court made extensive reference to my testimony.

I provide technical demographic and mapping assistance to the Food Research and Action Center (FRAC) in Washington D.C and their constituent organizations around the country. Most of my work with FRAC involves the Summer Food Program and Child and Adult Care Food Program. Both programs provide nutritional assistance to school-age children who are eligible for free and reduced price meals. As part of this project, I developed an online interactive map to determine site eligibility for the two programs that has been in continuous use by community organizations and school districts around the country since 2003. The map is updated annually with new data from a Special Tabulation of the American Community Survey prepared by the U.S. Census Bureau for the Food and Nutrition Service of the U.S. Department of Agriculture.

Historical Redistricting Experience

In the 1980s and 1990s, I developed voting plans in about 400 state and local jurisdictions – primarily in the South and Rocky Mountain West. During the 2000s and

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2010s, I prepared draft election plans involving about 350 state and local jurisdictions in 25 states. Most of these plans were prepared at the request of local citizens' groups, national organizations such as the NAACP, tribal governments, and for Section 2 or Section 5 litigation.

Election plans I developed for governments in two counties – Sussex County, Virginia and Webster County, Mississippi – were adopted and precleared in 2002 by the U.S. Department of Justice. A ward plan I prepared for the City of Grenada, Mississippi was precleared in August 2005. A county supervisors' plan I produced for Bolivar County, Mississippi was precleared in January 2006.

In August 2005, a federal court ordered the State of South Dakota to remedy a Section 2 voting rights violation and adopt a state legislative plan I developed (*Bone Shirt v. Hazeltine*).

A county council plan I developed for Native American plaintiffs in a Section 2 lawsuit (*Blackmoon v. Charles Mix County*) was adopted by Charles Mix County, South Dakota in November 2005. A plan I drafted for Latino plaintiffs in Bethlehem, Pennsylvania (*Pennsylvania Statewide Latino Coalition v. Bethlehem Area School District*) was adopted in March 2009. Plans I developed for minority plaintiffs in Columbus County, North Carolina and Montezuma- Cortez School District in Colorado were adopted in 2009.

Since 1986, I have testified at trial as an expert witness on redistricting and demographics in federal courts in the following voting rights cases (approximate most recent testimony dates are in parentheses). I also filed declarations and was deposed in most of these cases.

Alabama

Caster v. Merrill (2022)

Chestnut v. Merrill (2019)

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Alabama State Conference of the NAACP v. Alabama (2018)
Alabama Legislative Black Caucus et al. v. Alabama et al. (2013)

Arkansas

The Christian Ministerial Alliance v. Hutchinson (2022)

Colorado

Cuthair v. Montezuma-Cortez School Board (1997)

Florida

NAACP v. Lee (2022)

Baroody v. City of Quincy (2020)

Georgia

Pendergrass v. Raffensperger (2022)

Alpha Phi Alpha v. Raffensperger (2022)

Cofield v. City of LaGrange (1996)

Love v. Deal (1995)

Askew v. City of Rome (1995)

Woodard v. Lumber City (1989)

Louisiana

Galmon v. Ardoin (2022)

Terrebonne Parish NAACP v. Jindal, et al. (2017)

Wilson v. Town of St. Francisville (1996)

Reno v. Bossier Parish (1995)

Knight v. McKeithen (1994)

Maryland

NAACP v. Baltimore County (2022)

Cane v. Worcester County (1994)

Mississippi

Thomas v. Bryant (2019)

Fairley v. Hattiesburg (2014)

Boddie v. Cleveland School District (2010)

Fairley v. Hattiesburg (2008)

Boddie v. Cleveland (2003)

Jamison v. City of Tupelo (2006)

Smith v. Clark (2002)

NAACP v. Fordice (1999)

Addy v Newton County (1995)

Ewing v. Monroe County (1995)

Gunn v. Chickasaw County (1995)

Nichols v. Okolona (1995)

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Montana

Old Person v. Brown (on remand) (2001)

Old Person v. Cooney (1998)

Missouri

Missouri NAACP v. Ferguson-Florissant School District (2016)

Nebraska

Stabler v. Thurston County (1995)

New York

NAACP v. East Ramapo Central School District (2020)

Pope v. County of Albany (2015)

Arbor Hills Concerned Citizens v. Albany County (2003)

Ohio

A. Philip Randolph Institute, et al. v. Ryan (2019)

South Carolina

Smith v. Beasley (1996)

South Dakota

Bone Shirt v. Hazeltine (2004)

Cottier v. City of Martin (2004)

Tennessee

Cousins v. McWherter (1994)

Rural West Tennessee African American Affairs Council v. McWherter (1993)

Texas

Jayla Allen v. Waller County, Texas

Utah

Navajo Nation v. San Juan County (2017), brief testimony –11 declarations, 2 depositions

Virginia

Smith v. Brunswick County (1991)

Henderson v. Richmond County (1988)

McDaniel v. Mehfoud (1988)

White v. Daniel (1989)

Wyoming

Large v. Fremont County (2007)

In addition, I have filed expert declarations or been deposed in the following cases that did not require trial testimony. The dates listed indicate the deposition date or

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date of last declaration or supplemental declaration:

Alabama

People First of Alabama v. Merrill (2020), Covid-19 demographics only
Alabama State NAACP v. City of Pleasant Grove (2019)
James v. Jefferson County Board of Education (2019)
Voketz v. City of Decatur (2018)

Arkansas

Mays v. Thurston (2020)-- Covid-19 demographics only)

Connecticut

NAACP v. Merrill (2020)

Florida

Florida State Conference of the NAACP v. Lee, et al., (2021)
Calvin v. Jefferson County (2016)
Thompson v. Glades County (2001)
Johnson v. DeSoto County (1999)
Burton v. City of Belle Glade (1997)

Georgia

Dwight v. Kemp (2018)
Georgia NAACP et al. v. Gwinnett County, GA (2018)
Georgia State Conference NAACP et al v. Georgia (2018)
Georgia State Conference NAACP, et al. v. Fayette County (2015)
Knighton v. Dougherty County (2002)
Johnson v. Miller (1998)
Jones v. Cook County (1993)

Kentucky

Herbert v. Kentucky State Board of Elections (2013)

Louisiana

Power Coalition for Equity and Justice v. Edwards (2020), Covid-19 demographics only
Johnson v. Ardoin (2019)
NAACP v. St. Landry Parish Council (2005)
Prejean v. Foster (1998)
Rodney v. McKeithen (1993)

Maryland

Baltimore County NAACP v. Baltimore County (2022)
Benisek v. Lamone (2017)
Fletcher v. Lamone (2011)

Mississippi

Partee v. Coahoma County (2015)

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Figgs v. Quitman County (2015)
West v. Natchez (2015)
Williams v. Bolivar County (2005)
Houston v. Lafayette County (2002)
Clark v. Calhoun County (on remand)(1993)
Teague v. Attala County (on remand)(1993)
Wilson v. Clarksdale (1992)
Stanfield v. Lee County(1991)

Montana

Alden v. Rosebud County (2000)

North Carolina

Lewis v. Alamance County (1991)
Gause v. Brunswick County (1992)
Webster v. Person County (1992)

Rhode Island

Davidson v. City of Cranston (2015)

South Carolina

Thomas v. Andino (2020), Covid-19 demographics only
Vander Linden v. Campbell (1996)

South Dakota

Kirkie v. Buffalo County (2004)
Emery v. Hunt (1999)

Tennessee

NAACP v. Frost, et al. (2003)

Virginia

Moon v. Beyer (1990)

Washington

Glatt v. City of Pasco (2016)
Montes v. City of Yakima (2014)

###

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT B

Exhibit B – Methodology and Sources

1. In the preparation of this report, I analyzed population and geographic data from the Decennial Census and the American Community Survey.

2. For my redistricting analysis, I used a geographic information system (GIS) software package called *Maptitude for Redistricting*, developed by the Caliper Corporation. This software is deployed by many local and state governing bodies across the country for redistricting and other types of demographic analysis.

3. The geographic boundary files that I used with *Maptitude* are created from the U.S. Census 1990-2020 TIGER (Topologically Integrated Geographic Encoding and Referencing) files.

4. I used population data from the 1990-2020 PL 94-171 data files published by the U.S. Census Bureau. The PL 94-171 dataset is published in electronic format and is the complete count population file designed by the Census Bureau for use in legislative redistricting. The file contains basic race and ethnicity data on the total population and voting-age population found in units of Census geography such as states, counties, municipalities, townships, reservations, school districts, census tracts, census block groups, precincts (called voting districts or “VTDs” by the Census Bureau) and census blocks.

5. I obtained and used 2020 block-level disaggregated citizenship data (2015-2019 ACS and 2016-2020 ACS) from the Redistricting Data Hub via <https://redistrictingdatahub.org/>

6. The attorneys for the plaintiffs provided me with incumbent addresses.

7. For my analysis, I also relied on shapefiles for current and historical legislative plans available on the website of the Legislative and Congressional Reapportionment Office.

8. In addition, I obtained shapefiles for the House, Senate, and Congressional plans in effect during the early 2000's from the American Redistricting Project.

<https://thearp.org/blog/map-archive/>

9. I developed the illustrative plans presented in this report using *Maptitude for Redistricting*. The *Maptitude for Redistricting* software processes the TIGER files to produce a map for display on a computer screen. The software also merges demographic data from the PL 94-171 files to match the relevant decennial Census geography.

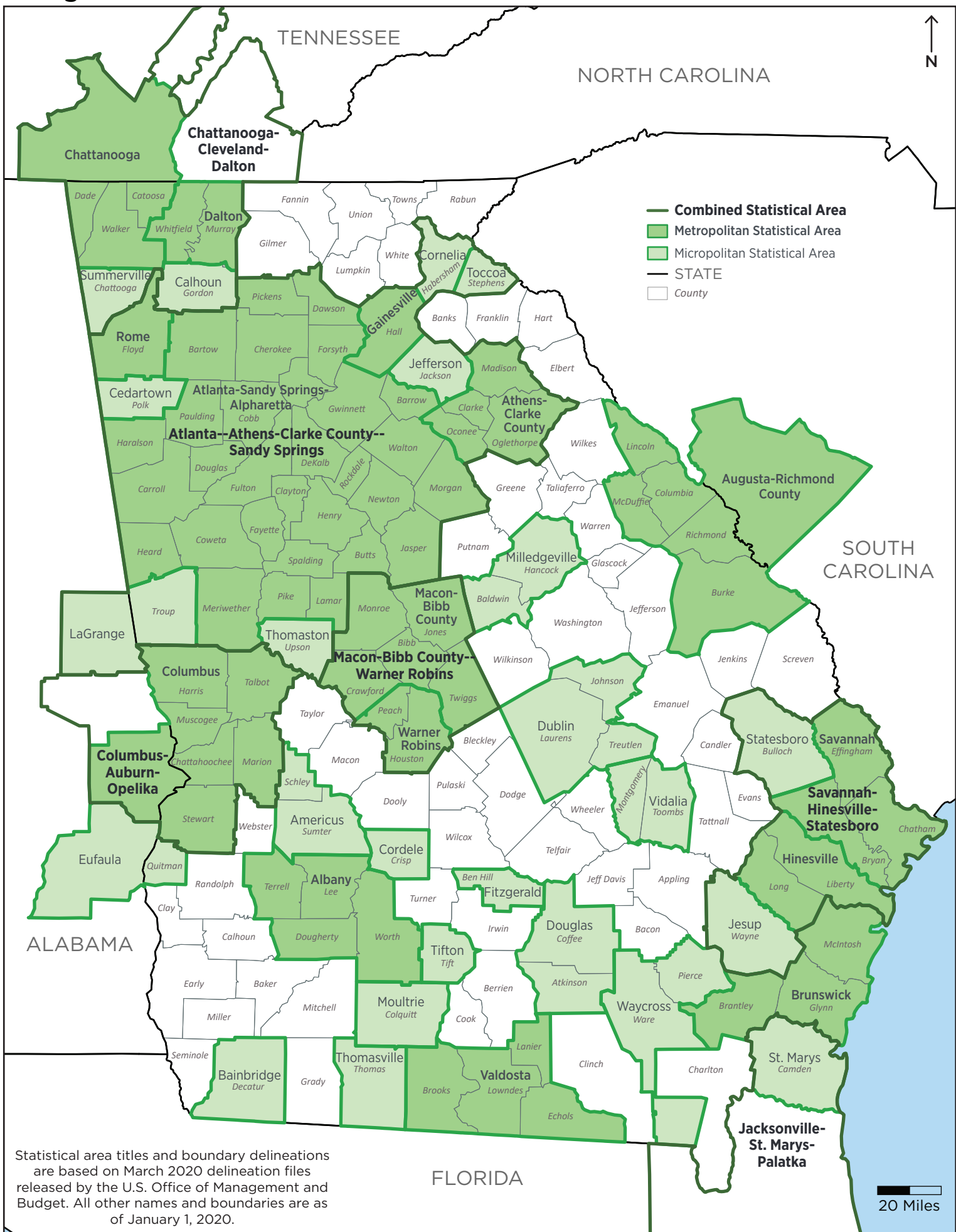
10. I also reviewed and used data from the American Community Survey ("ACS") conducted by the Census Bureau – specifically, the 1-year 2021 ACS, the 5-year 2015-2019 ACS, and the 5-year 2016-2020 ACS Special Tabulation of citizen population and voting age population by race and ethnicity (prepared by the

Census Bureau for the U.S. Department of Justice) and available from the link below:

<https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>

#

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT C



DECLARATION OF WILLIAM S. COOPER:
EXHIBIT D

Metro Atlanta Black Population Change 2010-2020 by County

Illustrative District 6 Counties with Highlight

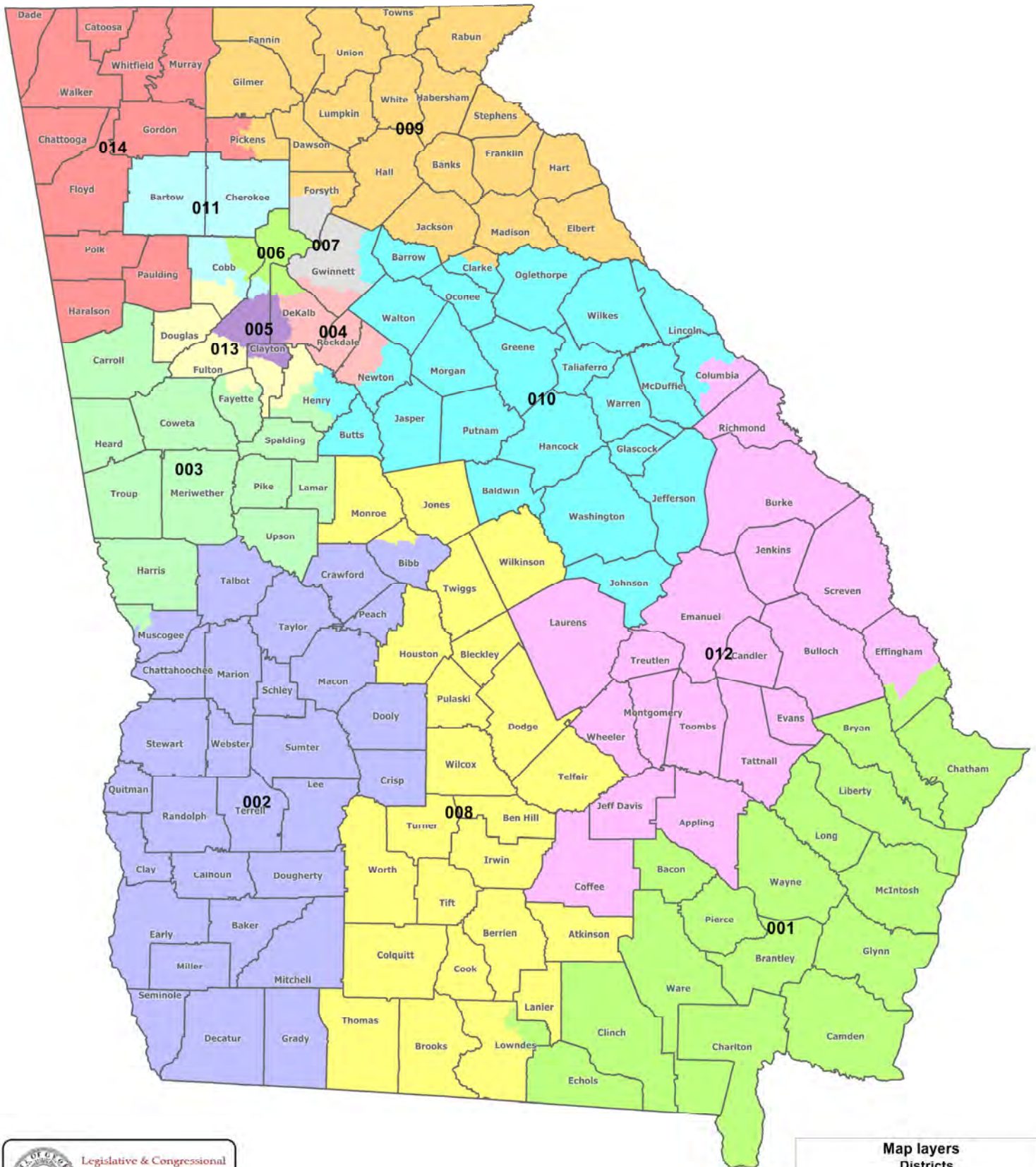
2010 -2020 Change

County (Metro Atlanta in Bold)	2020 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Black	18+ Latino	NH18+ White	Black Pop		Black		% Black
									Pop Change	Change	18+ Pop Change	18+Pop change	18+Pop change
BARROW	83505	11907	10560	55582	62195	8222	6726	43241	14138	3287	12417	2553	45.0%
BARTOW	108901	13395	10751	80159	83570	9377	6817	63759	8744	2365	10213	2083	28.6%
BUTTS	25434	7212	803	16628	20360	5660	559	13510	1779	595	2030	564	11.1%
CARROLL	119148	24618	9586	80725	90996	17827	6129	63803	8621	3049	8593	2916	19.6%
CHEROKEE	266620	21687	32111	197867	202928	14976	20915	156155	52274	7817	47502	6222	71.1%
CLAYTON	297595	216351	42546	25902	220578	158854	27378	23396	38171	40374	36133	37475	30.9%
COBB	766149	223116	111240	369182	591848	166141	74505	303300	78071	42151	80257	41430	33.2%
COWETA	146158	28289	11053	99421	111155	20196	7384	78073	18841	5130	18670	4501	28.7%
DAWSON	26798	392	1605	23544	21441	249	1047	19183	4468	203	4194	146	141.7%
DEKALB	764382	407451	81471	215895	595276	314230	55506	180161	72489	22898	68519	34330	12.3%
DOUGLAS	144237	74260	16035	49877	108428	53377	10212	41416	11834	20007	13558	17860	50.3%
FAYETTE	119194	32076	9480	68144	91798	23728	6168	55102	12627	9578	13330	8373	54.5%
FORSYTH	251283	13222	25226	159407	181193	8751	16204	122017	75772	7917	59087	5460	165.9%
FULTON	1066710	477624	86302	404793	847182	368635	61914	340541	146129	60732	146287	62029	20.2%
GWINNETT	957062	287687	220460	310583	709484	202762	146659	252041	151741	86155	138870	71745	54.8%
HARALSON	29919	1541	497	26825	22854	1106	323	20617	1139	13	1307	44	4.1%
HEARD	11412	1142	253	9589	8698	832	153	7407	-422	-101	-88	-60	-6.7%
HENRY	240712	125211	18437	86297	179973	89657	12030	69744	36790	46914	35708	38225	74.3%
JASPER	14588	2676	684	10771	11118	1966	402	8400	688	-466	693	-306	-13.5%
LAMAR	18500	5220	475	12344	14541	4017	323	9852	183	-611	93	-577	-12.6%
MERIWETHER	20613	7547	475	12084	16526	5845	299	9994	-1379	-1204	-256	-393	-6.3%
MORGAN	20097	4339	712	14487	15574	3280	434	11452	2229	20	2145	160	5.1%
NEWTON	112483	55901	7164	46746	84748	40433	4561	37631	12525	13634	13663	12748	46.0%
PAULDING	168661	41296	12564	108444	123998	28164	7974	83066	26337	15231	24768	11767	71.8%
PICKENS	33216	512	1198	30122	26799	319	755	24626	3785	124	4005	81	34.0%
PIKE	18889	1613	348	16313	14337	1254	207	12422	1020	-333	1306	-210	-14.3%
ROCKDALE	93570	57204	9540	24500	71503	41935	6089	21457	8355	16468	9202	14643	53.7%
SPALDING	67306	24522	3666	37105	52123	17511	2377	30612	3233	2894	4261	2752	18.6%
WALTON	96673	18804	5228	68499	73098	13165	3236	53647	12905	5086	11918	4068	44.7%
29-County MSA	6,089,815	2,186,815	730,470	2,661,835	4,654,322	1,622,469	487,286	2,156,625	803,087	409,927	768,385	380,629	30.7%

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT E

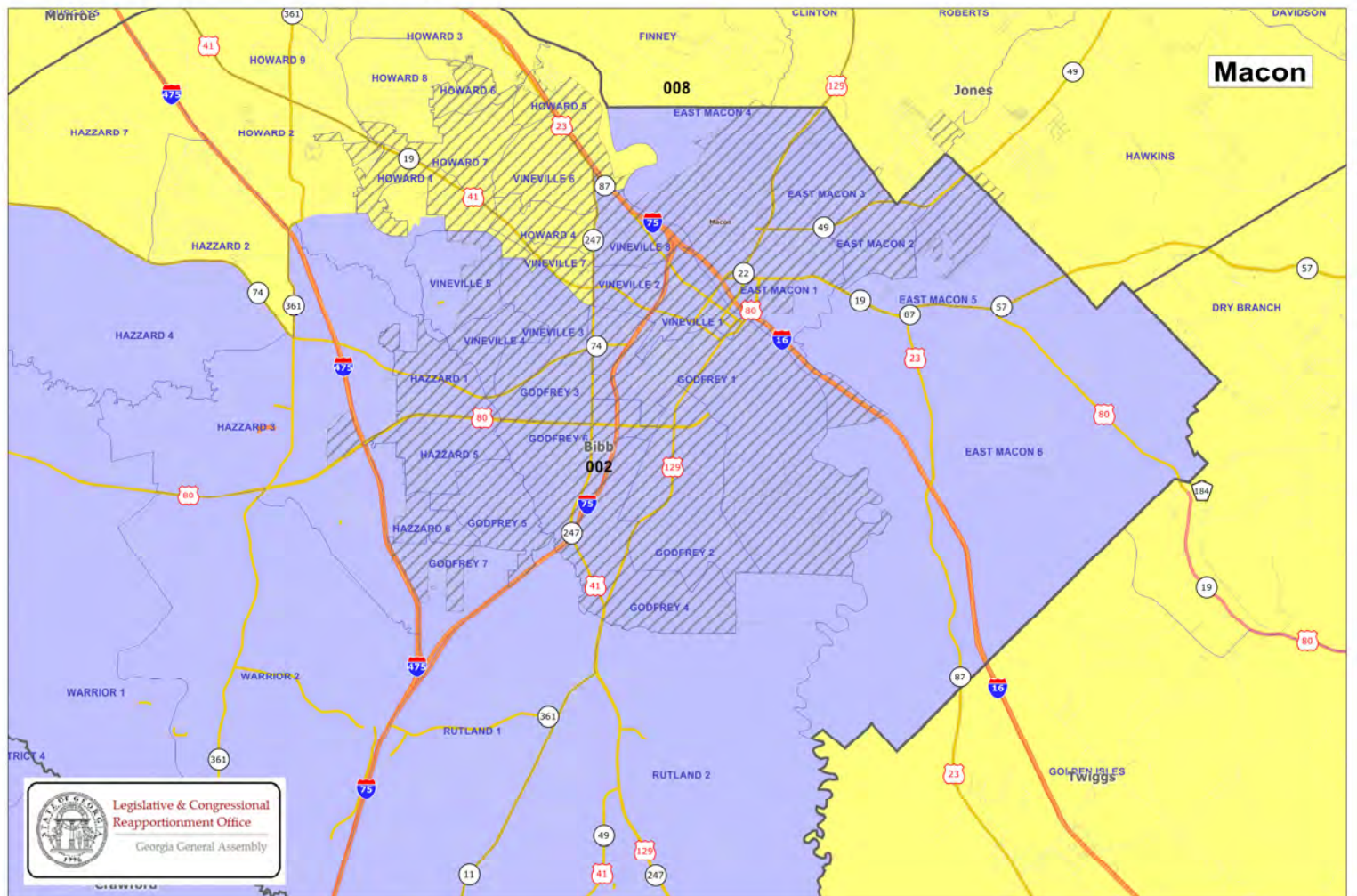
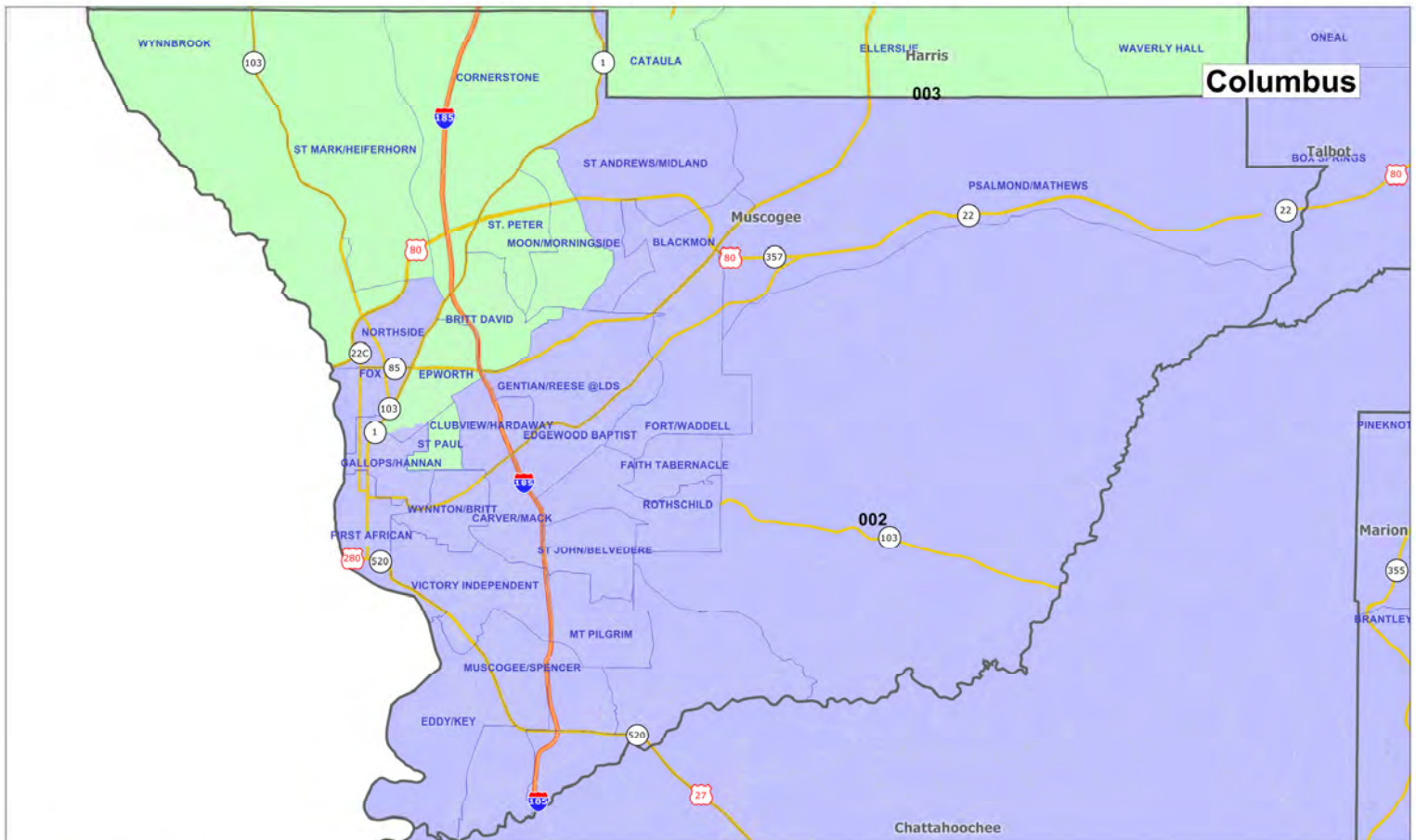
Georgia Congressional Districts

Client: State
Plan: Congress12
Type: Congress



[illegible]

Georgia Congressional Districts



Legislative & Congressional
Reapportionment Office
Georgia General Assembly

Plan Name: **Congress12**Plan Type : **Congress**User: **staff**Administrator: **State**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
001	691,974	-1	0.00%	207,711	30.02%	8,443	216,154	31.24%	39,767	5.75%
VAP	518,743			147,082	28.35%	3,105	150,187	28.95%	25,656	4.95%
002	691,976	1	0.00%	354,925	51.29%	6,835	361,760	52.28%	31,577	4.56%
VAP	516,392			252,570	48.91%	2,847	255,417	49.46%	20,824	4.03%
003	691,974	-1	0.00%	159,578	23.06%	7,034	166,612	24.08%	34,910	5.04%
VAP	511,518			112,315	21.96%	2,247	114,562	22.40%	22,243	4.35%
004	691,976	1	0.00%	397,911	57.50%	10,608	408,519	59.04%	64,605	9.34%
VAP	503,508			278,767	55.36%	5,240	284,007	56.41%	41,041	8.15%
005	691,976	1	0.00%	409,269	59.14%	9,031	418,300	60.45%	54,614	7.89%
VAP	541,900			306,497	56.56%	5,708	312,205	57.61%	37,210	6.87%
006	691,975	0	0.00%	86,265	12.47%	6,771	93,036	13.44%	92,409	13.35%
VAP	519,046			64,149	12.36%	3,330	67,479	13.00%	62,253	11.99%
007	691,975	0	0.00%	125,010	18.07%	8,298	133,308	19.26%	129,930	18.78%
VAP	489,868			83,770	17.10%	3,453	87,223	17.81%	82,112	16.76%
008	691,976	1	0.00%	204,995	29.62%	5,455	210,450	30.41%	39,578	5.72%
VAP	518,240			145,966	28.17%	1,898	147,864	28.53%	25,129	4.85%
009	691,975	0	0.00%	46,065	6.66%	3,675	49,740	7.19%	79,413	11.48%
VAP	520,856			33,384	6.41%	1,014	34,398	6.60%	46,597	8.95%
010	691,976	1	0.00%	172,398	24.91%	5,577	177,975	25.72%	32,589	4.71%
VAP	521,343			123,759	23.74%	1,963	125,722	24.12%	20,668	3.96%
011	691,975	0	0.00%	107,707	15.57%	7,554	115,261	16.66%	75,109	10.85%
VAP	512,598			76,732	14.97%	3,130	79,862	15.58%	47,452	9.26%
012	691,975	0	0.00%	238,190	34.42%	7,297	245,487	35.48%	36,890	5.33%
VAP	518,253			169,848	32.77%	2,741	172,589	33.30%	23,384	4.51%
013	691,976	1	0.00%	382,493	55.28%	11,657	394,150	56.96%	71,303	10.30%
VAP	495,652			262,130	52.89%	5,163	267,293	53.93%	43,142	8.70%
014	691,974	-1	0.00%	57,918	8.37%	5,428	63,346	9.15%	70,995	10.26%
VAP	508,184			40,501	7.97%	1,480	41,981	8.26%	41,291	8.13%

Plan Name: **Congress12**Plan Type : **Congress**User: **staff**Administrator: **State**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
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Total Population: 9,687,653

Ideal Value: 691,975

Summary Statistics

Population Range: 691,974 to 691,976

Absolute Overall Range: 2

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT F

Population Summary Report

Georgia U.S. House -- 2020 Census -- 2012 Benchmark Plan

District	Population	Deviation	% Deviation	AP Black	% AP Black	Latino	% Latino	NH White	% NH White
01	755781	-9355	-1.22%	230595	30.51%	59037	7.81%	431902	57.15%
02	673028	-92108	-12.04%	357993	53.19%	38403	5.71%	259967	38.63%
03	763075	-2061	-0.27%	210025	27.52%	49428	6.48%	467888	61.32%
04	773761	8625	1.13%	478654	61.86%	84862	10.97%	160581	20.75%
05	788126	22990	3.00%	450410	57.15%	65869	8.36%	229087	29.07%
06	765793	657	0.09%	111594	14.57%	107495	14.04%	425616	55.58%
07	859440	94304	12.33%	192903	22.45%	179379	20.87%	327075	38.06%
08	719919	-45217	-5.91%	234178	32.53%	49867	6.93%	410808	57.06%
09	775367	10231	1.34%	58090	7.49%	102240	13.19%	580920	74.92%
10	775012	9876	1.29%	204453	26.38%	52350	6.75%	480661	62.02%
11	802515	37379	4.89%	147155	18.34%	101218	12.61%	501446	62.48%
12	738624	-26512	-3.47%	270885	36.67%	49500	6.70%	390796	52.91%
13	792916	27780	3.63%	509032	64.20%	95919	12.10%	164627	20.76%
14	728551	-36585	-4.78%	82179	11.28%	87890	12.06%	530782	72.85%
Total	10711908		24.37%	3538146	33.03%	1123457	10.49%	5362156	50.06%

District	18+ Pop	18+ SR Black	% 18+ SR Black	18+ AP Black	% 18+ AP Black	18+ Latino	% 18+ Latino	18+ NH White	% 18+ NH White
01	582105	157603	27.07%	165850	28.49%	39826	6.84%	349176	59.99%
02	518145	257952	49.78%	264896	51.12%	25509	4.92%	214262	41.35%
03	583475	144198	24.71%	151383	25.95%	32235	5.52%	373021	63.93%
04	587002	342687	58.38%	357025	60.82%	55810	9.51%	136384	23.23%
05	635913	337506	53.07%	350672	55.14%	47194	7.42%	200864	31.59%
06	589600	76565	12.99%	85256	14.46%	72875	12.36%	342630	58.11%
07	635791	125592	19.75%	136048	21.40%	120021	18.88%	261700	41.16%
08	549306	163622	29.79%	169305	30.82%	32639	5.94%	328086	59.73%
09	603376	37833	6.27%	41315	6.85%	64783	10.74%	471167	78.09%
10	599155	143138	23.89%	149396	24.93%	34397	5.74%	386676	64.54%
11	622759	100488	16.14%	109414	17.57%	67723	10.87%	404958	65.03%
12	565091	189400	33.52%	197124	34.88%	32450	5.74%	313867	55.54%
13	596630	359769	60.30%	373783	62.65%	62186	10.42%	140659	23.58%
14	551926	52066	9.43%	56519	10.24%	55270	10.01%	418883	75.89%
Total	8220274	2488419	30.27%	2607986	31.73%	742918	9.04%	4342333	52.82%

District	% NH Single-Race Black CVAP*	% Latino CVAP	% NH Single-Race Asian CVAP*	% SR NH White CVAP
001	30.09%	4.47%	1.55%	62.88%
002	51.78%	2.96%	1.00%	43.47%
003	24.88%	3.61%	1.60%	69.06%
004	63.91%	3.95%	3.45%	27.85%
005	59.21%	3.50%	3.41%	33.18%
006	15.20%	5.78%	8.07%	70.14%
007	22.46%	9.90%	11.84%	54.91%
008	31.28%	3.20%	1.28%	63.51%
009	7.15%	5.32%	1.12%	85.39%
010	25.49%	3.29%	1.89%	68.68%
011	17.37%	5.62%	2.67%	73.54%
012	35.23%	3.75%	1.45%	58.83%
013	61.85%	5.45%	2.46%	29.45%
014	9.57%	5.27%	0.85%	83.31%

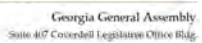
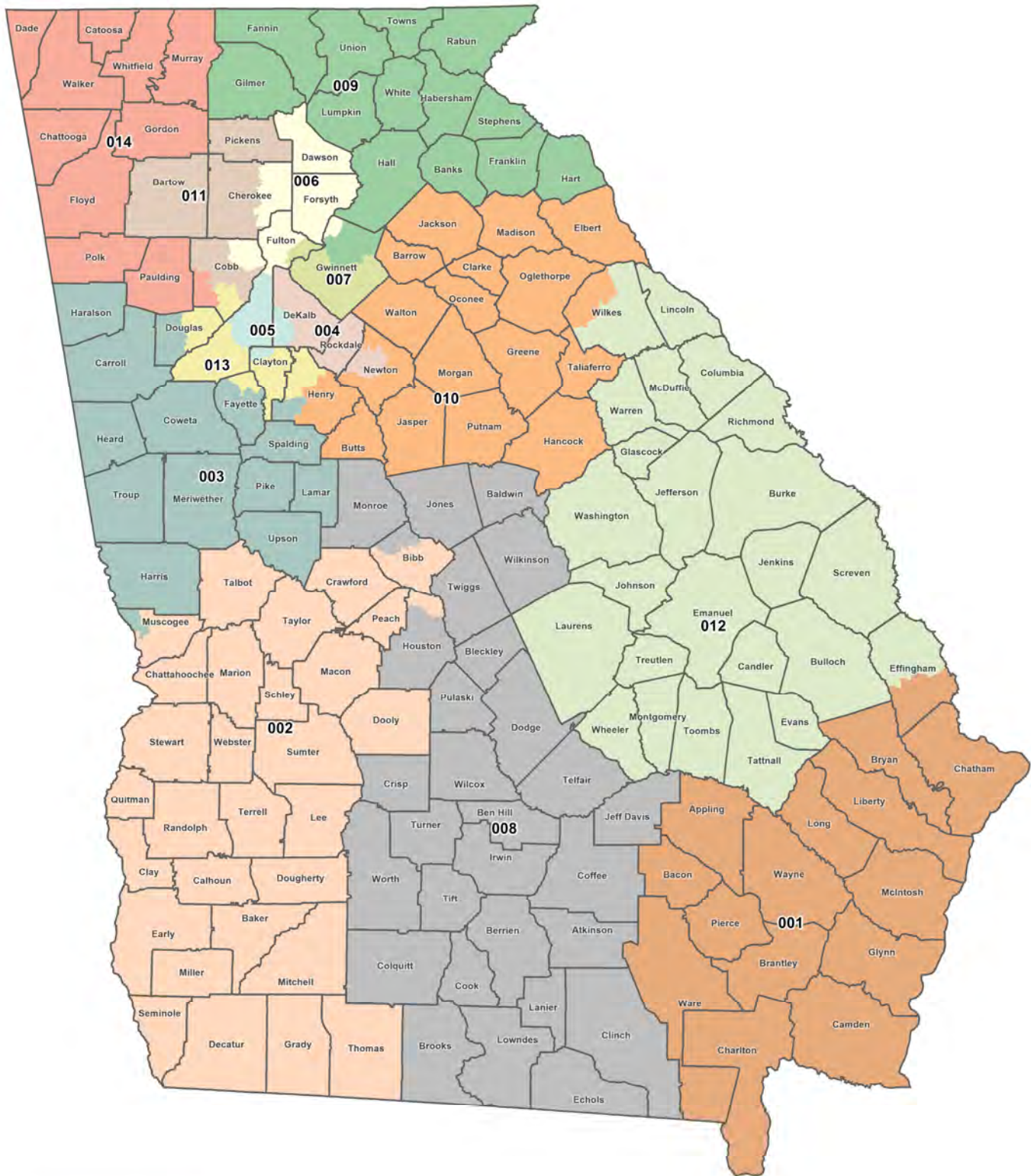
Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates (with a survey midpoint of July 2017)

Source for CVAP disaggregation: Redistricting Data Hub

<https://redistrictingdatahub.org/dataset/georgia-cvap-data-disaggregated-to-the-2020-block-level-2019/>

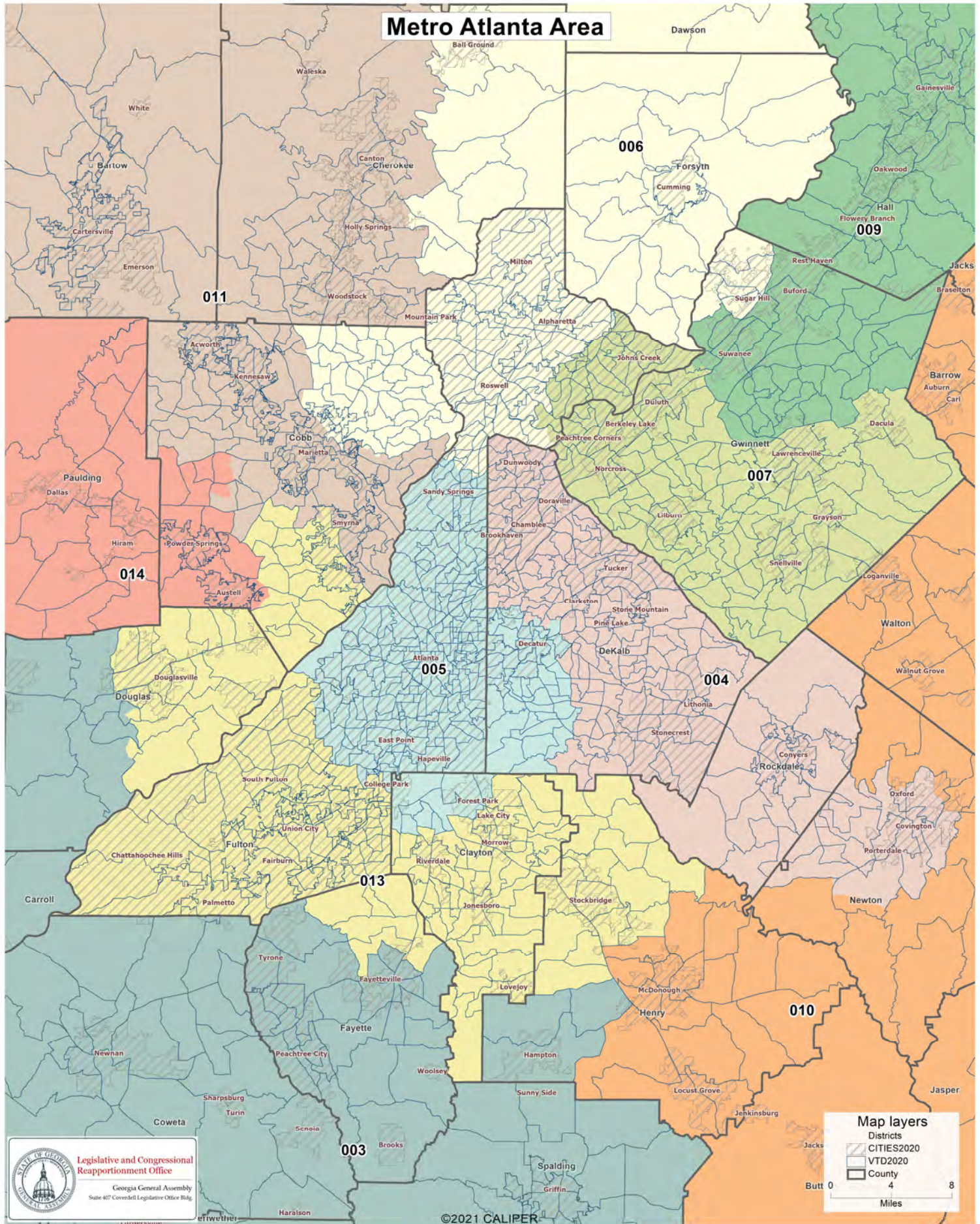
DECLARATION OF WILLIAM S. COOPER:
EXHIBIT G

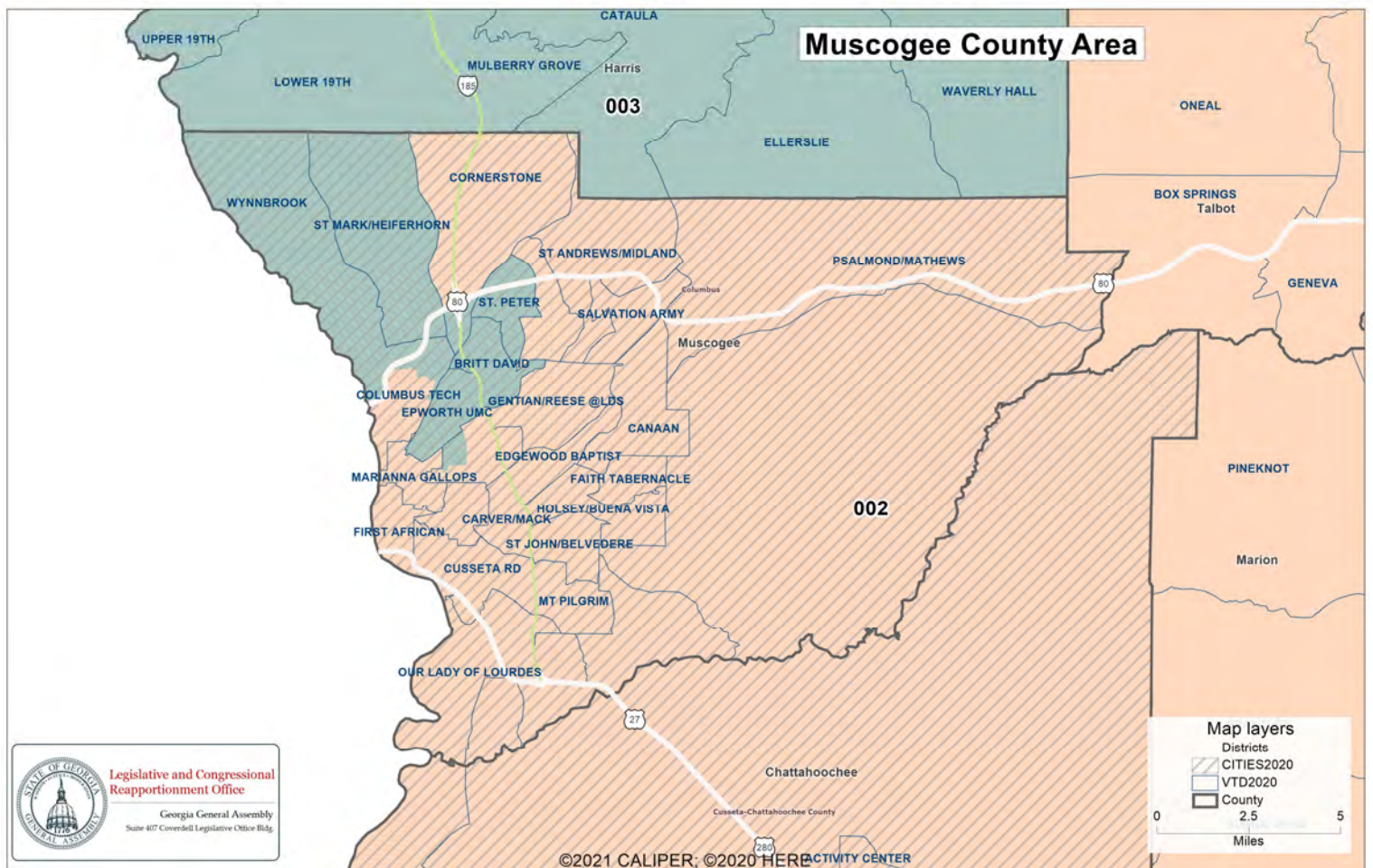
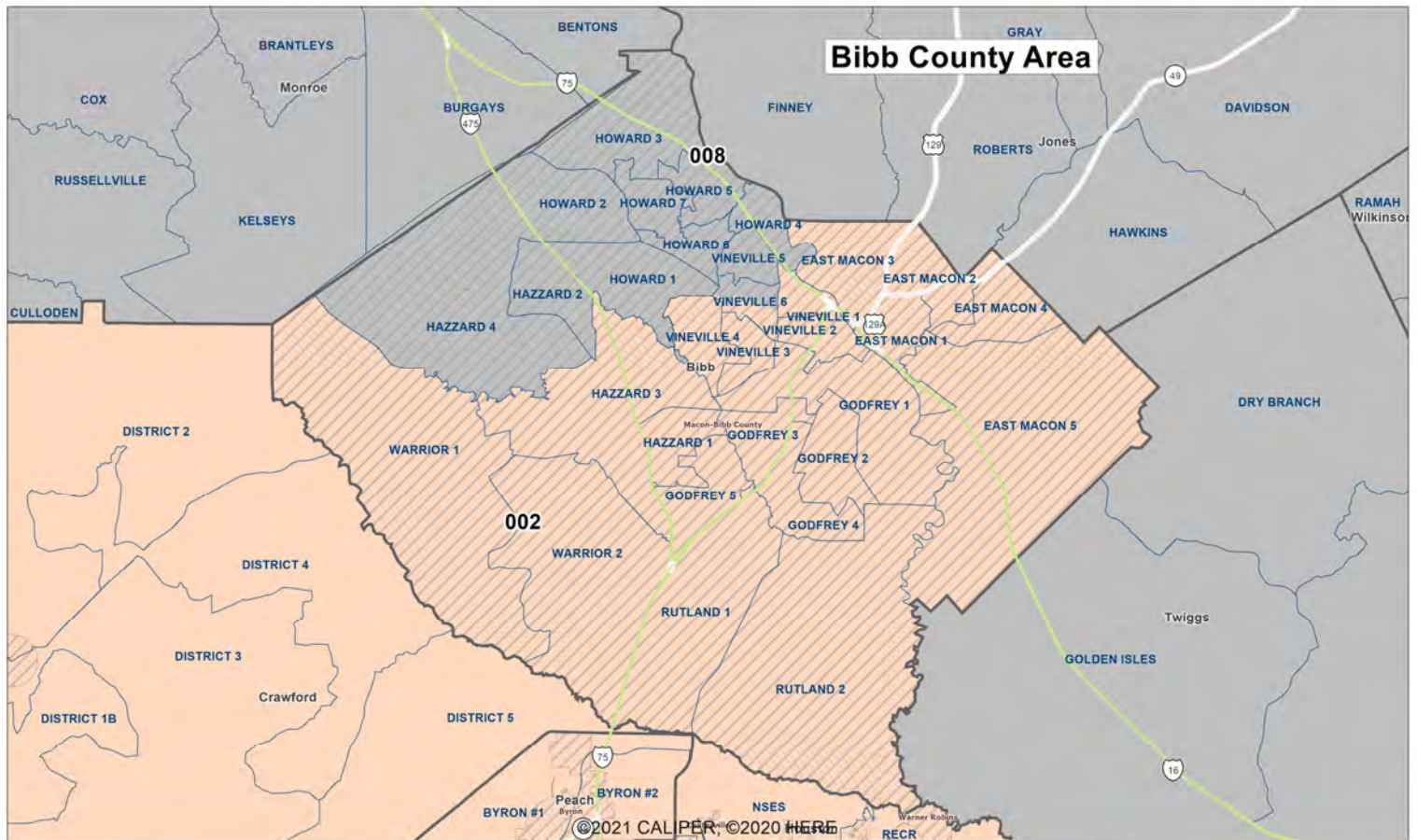
Client: S018
Plan: Congress-prop1-2021
Type: Congress



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Metro Atlanta Area



Proposed Joint Congressional Districts of Georgia

User: S018

Plan Name: Congress-prop1-2021

Plan Type: Congress

Population Summary

Summary Statistics:

Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.71
Relative Mean Deviation:	0.00%
Standard Deviation:	0.80

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	765,137	1	0.00%	589,266	77.01%	57.59%	27.54%	7.75%	2.19%	0.24%	0.16%	0.44%	4.1%
002	765,137	1	0.00%	587,555	76.79%	39.94%	49.03%	5.95%	1.34%	0.21%	0.1%	0.34%	3.09%
003	765,136	0	0.00%	586,319	76.63%	64.37%	22.61%	6.31%	2.09%	0.21%	0.04%	0.47%	3.91%
004	765,135	-1	0.00%	589,470	77.04%	25.82%	52.19%	11.63%	6.13%	0.16%	0.04%	0.65%	3.39%
005	765,137	1	0.00%	621,515	81.23%	35.79%	48.53%	7.38%	4.09%	0.16%	0.04%	0.52%	3.49%
006	765,136	0	0.00%	574,797	75.12%	63.7%	8.58%	10.23%	12.4%	0.16%	0.04%	0.69%	4.21%
007	765,137	1	0.00%	566,934	74.1%	29.52%	28.11%	23.77%	14.26%	0.16%	0.04%	0.69%	3.45%
008	765,136	0	0.00%	585,857	76.57%	57.91%	29.72%	7.17%	1.56%	0.19%	0.05%	0.31%	3.09%
009	765,137	1	0.00%	592,520	77.44%	64.7%	9.72%	15.39%	5.95%	0.2%	0.04%	0.42%	3.59%
010	765,135	-1	0.00%	588,874	76.96%	63.58%	22.12%	7.66%	2.26%	0.17%	0.04%	0.53%	3.63%
011	765,137	1	0.00%	595,201	77.79%	61.33%	16.33%	13.04%	3.76%	0.19%	0.04%	0.82%	4.49%
012	765,136	0	0.00%	588,119	76.86%	52.13%	36.12%	5.63%	1.83%	0.21%	0.11%	0.36%	3.61%
013	765,137	1	0.00%	574,789	75.12%	16.35%	64.26%	12.23%	3.17%	0.18%	0.05%	0.66%	3.1%
014	765,135	-1	0.00%	579,058	75.68%	68.07%	13.58%	12.69%	1.14%	0.22%	0.05%	0.4%	3.85%

Total: 10,711,908**Ideal District: 765,136**

User: S018

Plan Name: Congress-prop1-2021

Plan Type: Congress

Population Summary

Summary Statistics:

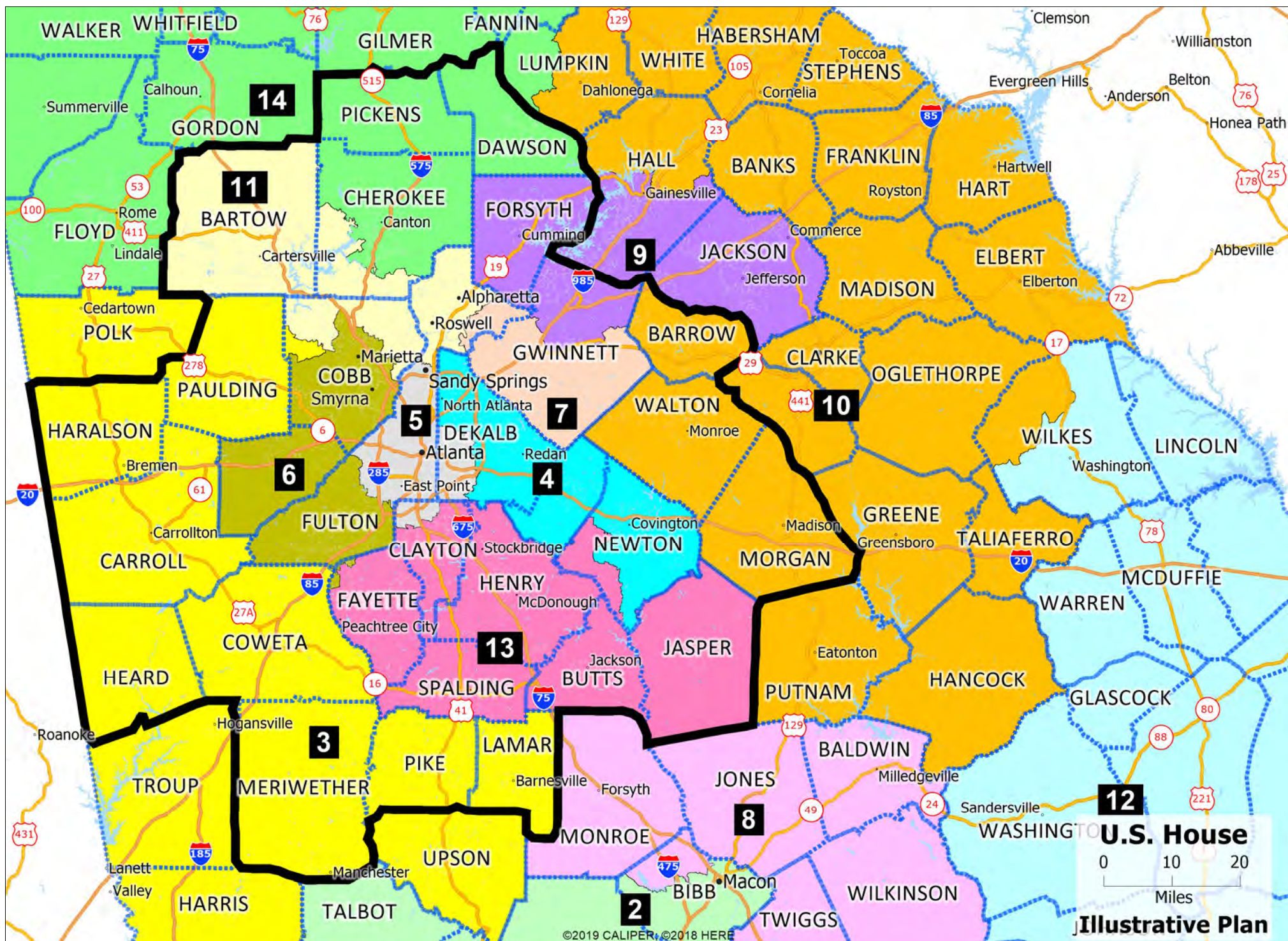
Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.71
Relative Mean Deviation:	0.00%
Standard Deviation:	0.80

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%

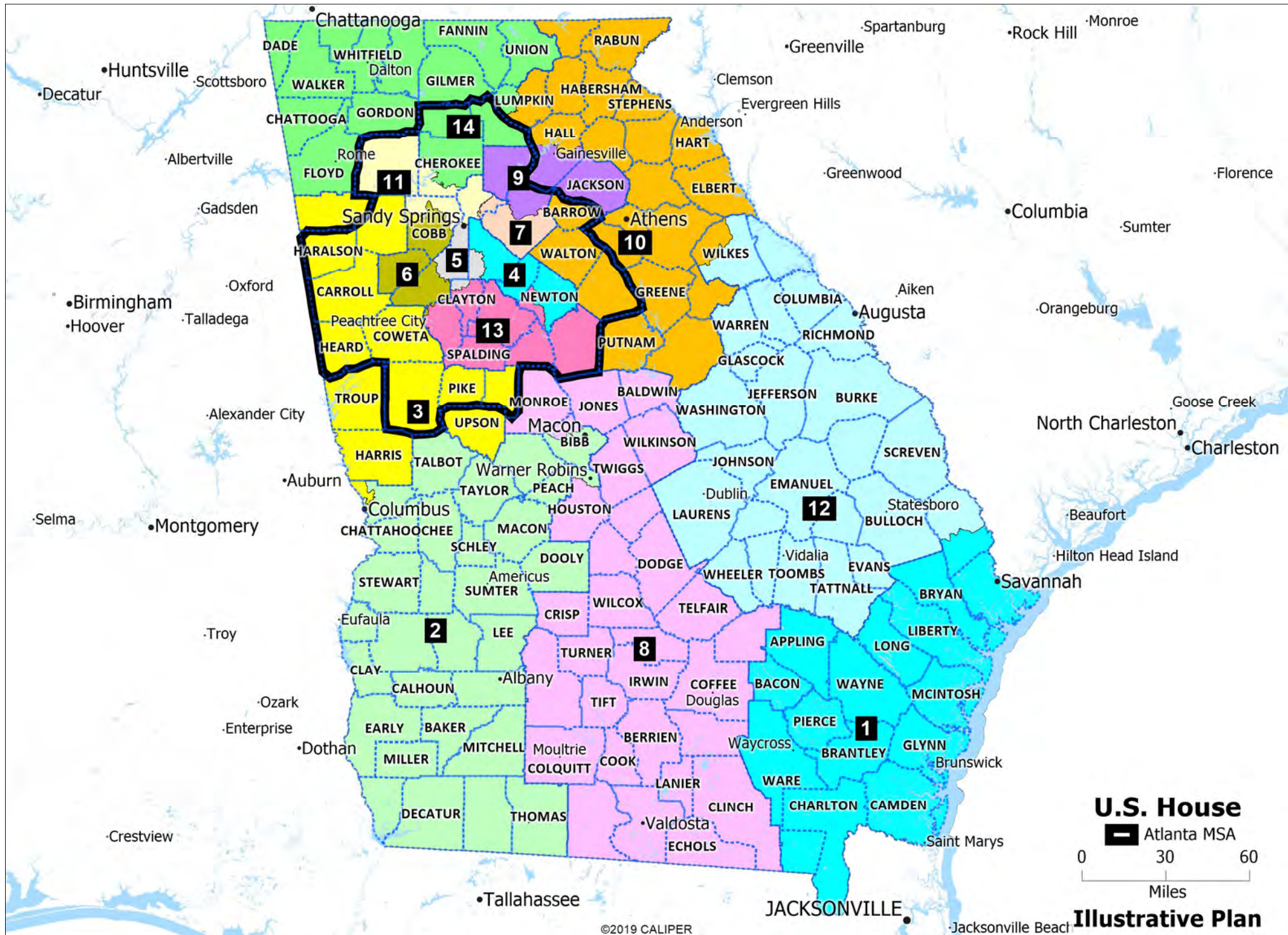
Total: 10,711,908

Ideal District: 765,136

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT H-1



DECLARATION OF WILLIAM S. COOPER:
EXHIBIT H-2



DECLARATION OF WILLIAM S. COOPER:
EXHIBIT I-1

Population Summary Report

Georgia U.S. House -- 2020 Census -- Illustrative Plan

District	Population	Deviation	% Deviation	AP Black	% AP Black	Latino	% Latino	NH White	% NH White
001	765137	1	0.00%	230783	30.16%	59328	7.75%	440636	57.59%
002	765137	1	0.00%	393195	51.39%	45499	5.95%	305611	39.94%
003	765135	-1	0.00%	166096	21.71%	49935	6.53%	517659	67.66%
004	765136	0	0.00%	410019	53.59%	87756	11.47%	212004	27.71%
005	765137	1	0.00%	392822	51.34%	56496	7.38%	273819	35.79%
006	765137	1	0.00%	396891	51.87%	108401	14.17%	225985	29.54%
007	765137	1	0.00%	239717	31.33%	181851	23.77%	225905	29.52%
008	765136	0	0.00%	241628	31.58%	54850	7.17%	443123	57.91%
009	765136	0	0.00%	94059	12.29%	128393	16.78%	429340	56.11%
010	765137	1	0.00%	118199	15.45%	61244	8.00%	548312	71.66%
011	765137	1	0.00%	110368	14.42%	81466	10.65%	492121	64.32%
012	765136	0	0.00%	294961	38.55%	43065	5.63%	398843	52.13%
013	765135	-1	0.00%	404963	52.93%	71377	9.33%	253135	33.08%
014	765135	-1	0.00%	44445	5.81%	93796	12.26%	595663	77.85%
Total	10711908		0.00%	3538146	33.03%	1123457	10.49%	5362156	50.06%

District	18+ Pop	18+ SR Black	% 18+ SR Black	18+ AP Black	% 18+ AP Black	18+ Latino	% 18+ Latino	18+ NH White	% 18+ NH White
001	589266	157770	26.77%	166025	28.17%	39938	6.78%	355947	60.41%
002	587555	281564	47.92%	289612	49.29%	30074	5.12%	251047	42.73%
003	580018	112454	19.39%	118709	20.47%	31852	5.49%	405926	69.99%
004	590640	298897	50.61%	311670	52.77%	58947	9.98%	177832	30.11%
005	621515	295885	47.61%	308271	49.60%	41432	6.67%	235652	37.92%
006	587247	282051	48.03%	294976	50.23%	71798	12.23%	192370	32.76%
007	566934	157650	27.81%	169071	29.82%	120604	21.27%	185838	32.78%
008	585857	170421	29.09%	175967	30.04%	35732	6.10%	354572	60.52%
009	564244	59821	10.60%	65790	11.66%	83453	14.79%	335720	59.50%
010	602127	81481	13.53%	86178	14.31%	39876	6.62%	447109	74.25%
011	588795	72303	12.28%	80507	13.67%	55168	9.37%	393920	66.90%
012	588119	207872	35.35%	215958	36.72%	28628	4.87%	321394	54.65%
013	576337	283204	49.14%	294669	51.13%	46150	8.01%	207154	35.94%
014	591620	27046	4.57%	30583	5.17%	59266	10.02%	477852	80.77%
Total	8220274	2488419	30.27%	2607986	31.73%	742918	9.04%	4342333	52.82%

District	% NH Single-Race Black CVAP*	% NH DOJ Black CVAP**	% Latino CVAP	% SR NH White CVAP
001	29.16%	29.67%	4.49%	63.10%
002	49.55%	50.001%	3.17%	44.62%
003	19.64%	20.02%	3.61%	74.12%
004	55.62%	56.37%	3.89%	35.11%
005	51.64%	52.35%	3.48%	39.75%
006	50.18%	50.98%	6.45%	39.13%
007	31.88%	32.44%	11.20%	43.69%
008	30.46%	30.76%	3.79%	63.40%
009	11.29%	11.74%	8.78%	71.51%
010	15.09%	15.39%	3.93%	78.27%
011	12.91%	13.48%	5.92%	74.73%
012	36.60%	37.19%	3.39%	56.94%
013	49.64%	50.34%	4.96%	40.44%
014	4.80%	5.19%	5.57%	87.19%

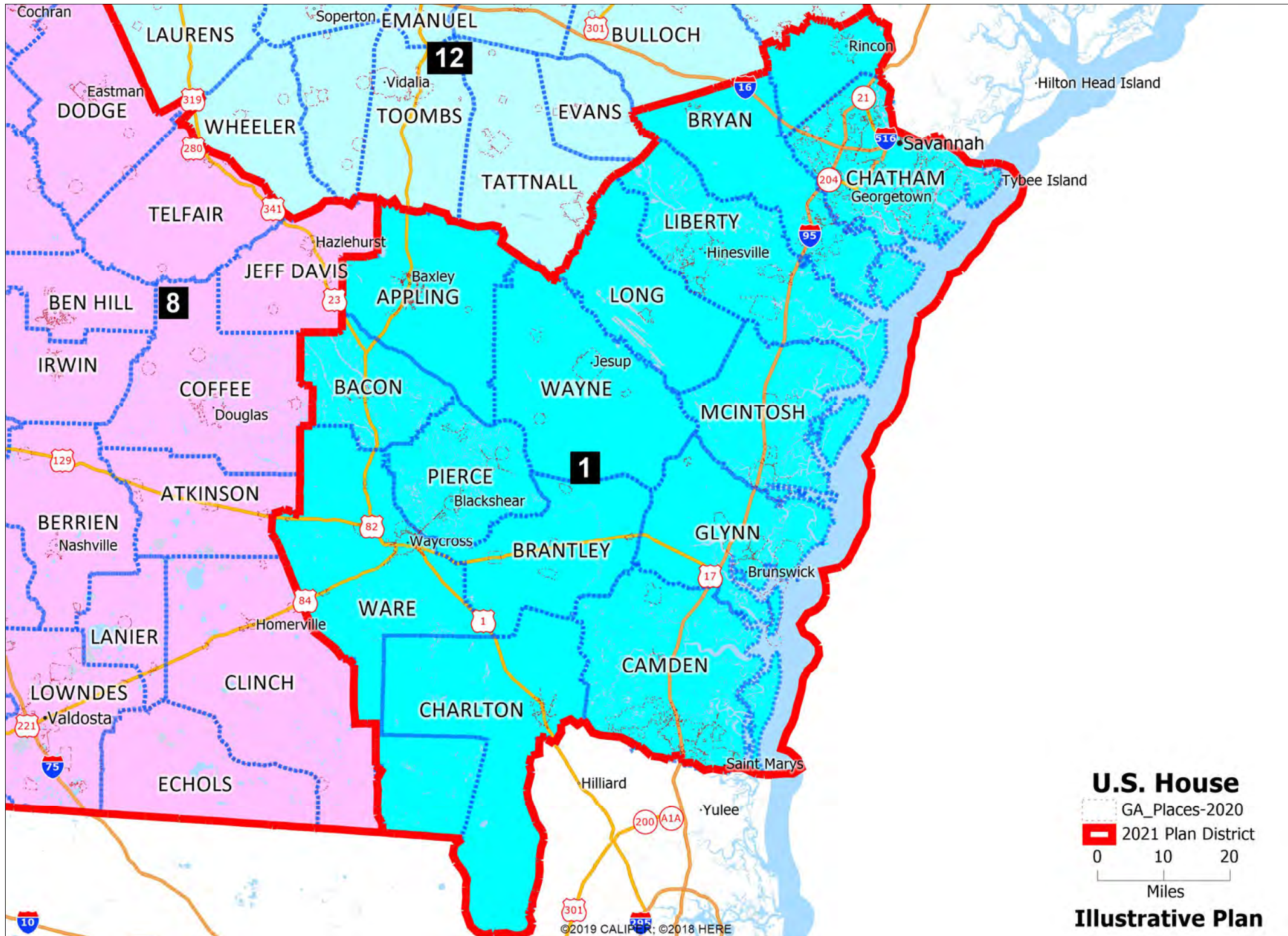
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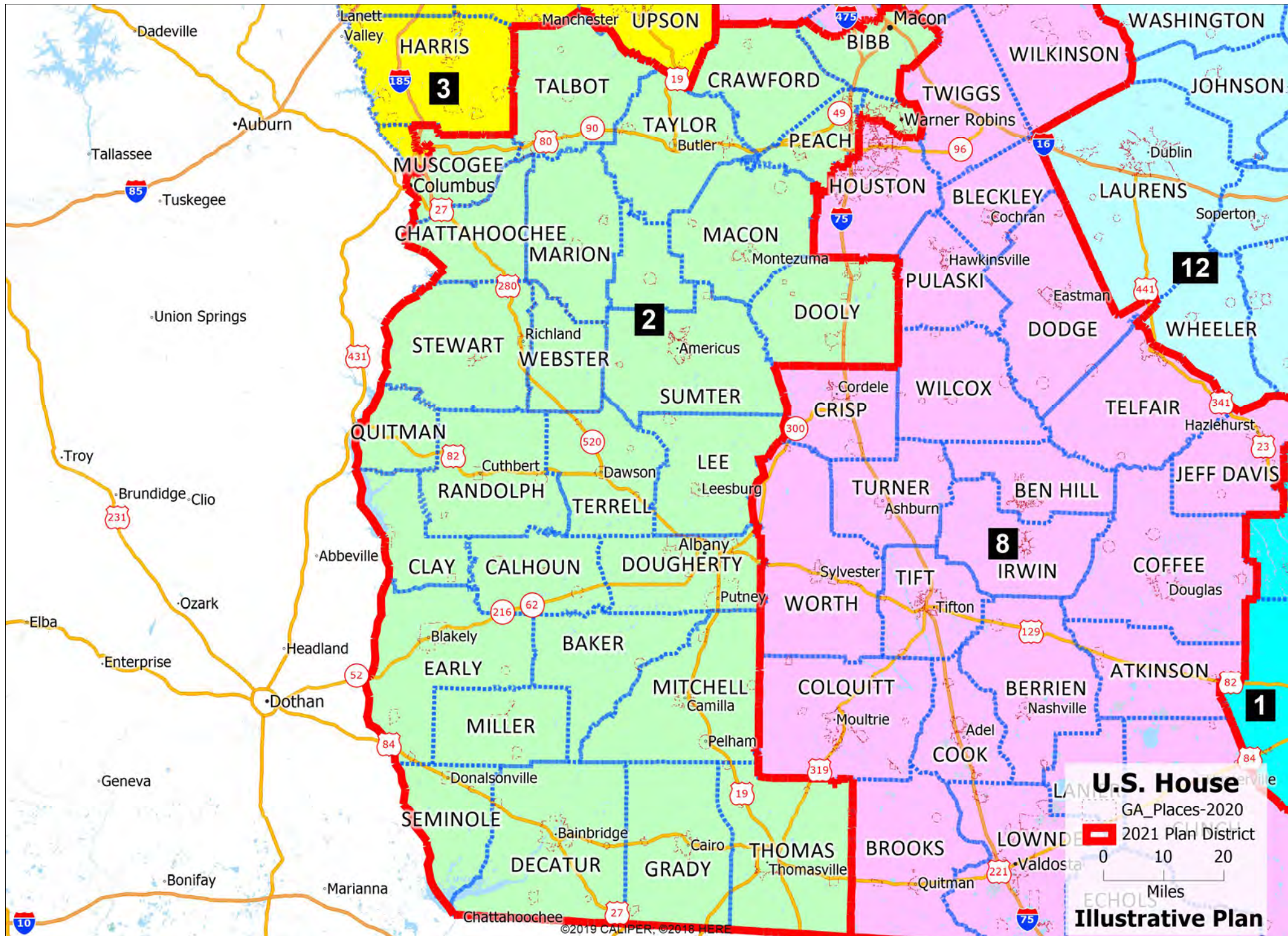
* 2016-20 ACS Special Tabulation <https://redistrictingdatahub.org/dataset/georgia-cvapo-data-disaggregated-to-the-block-level-2020/>

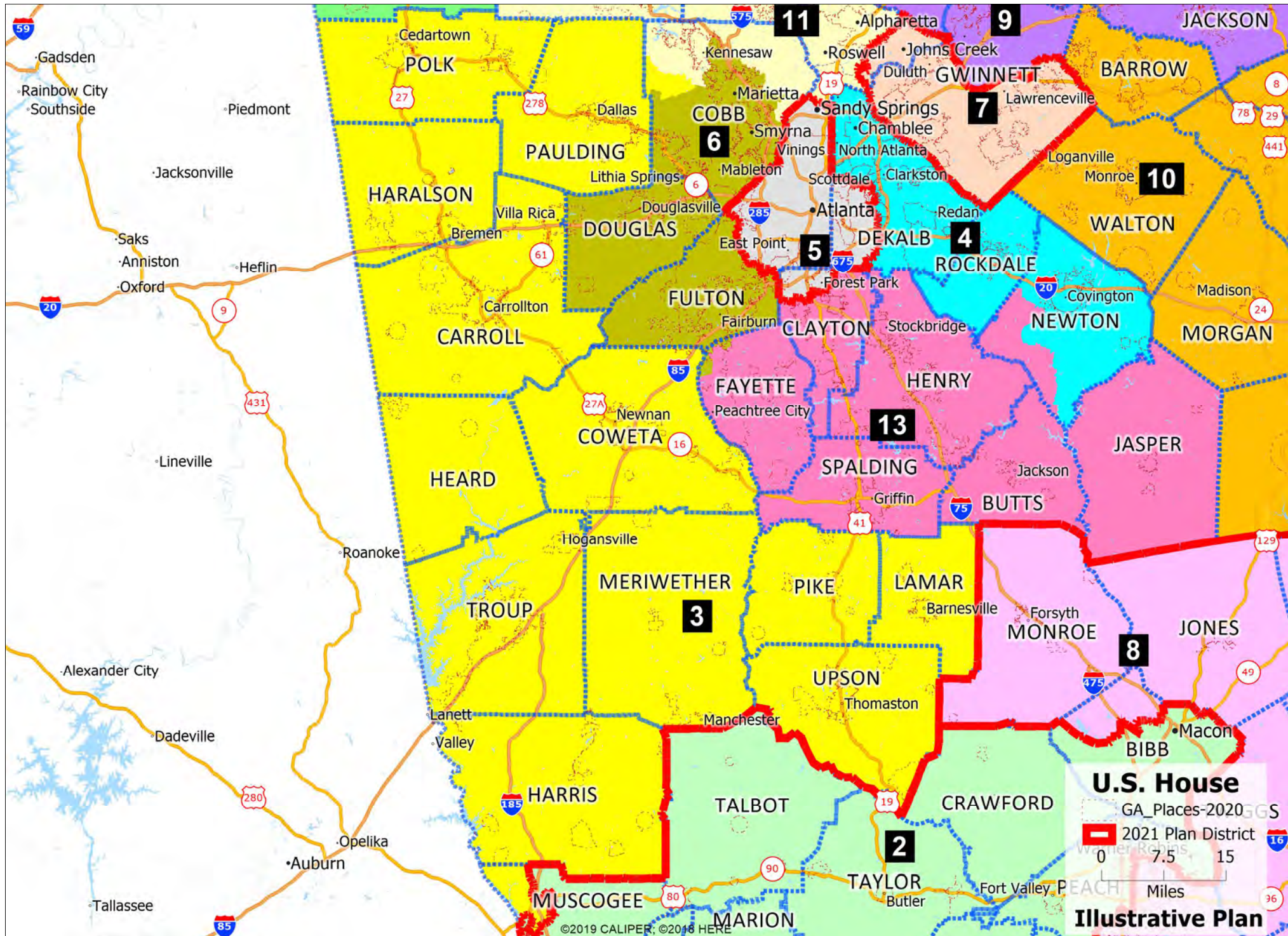
Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates

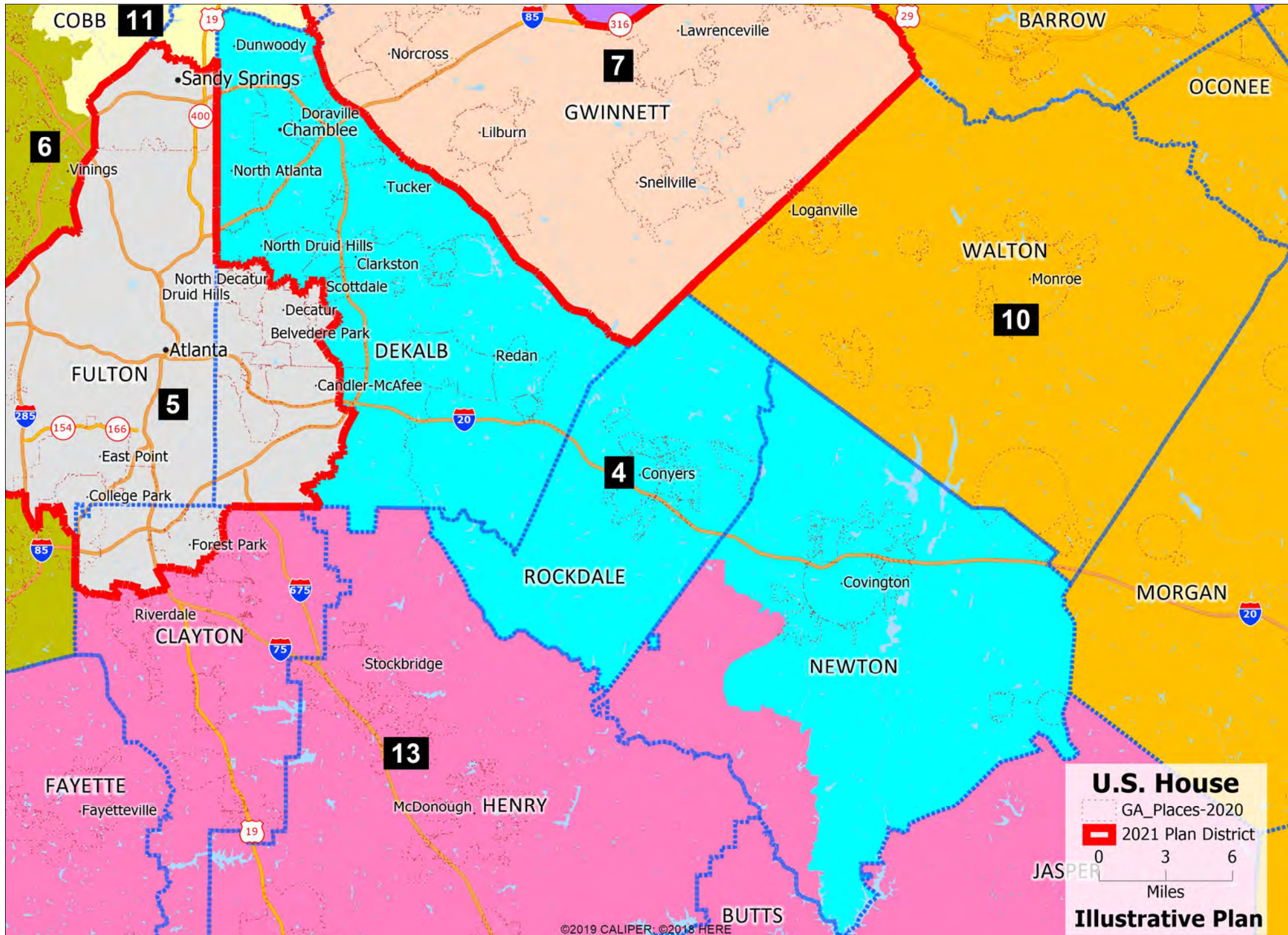
* Single race NH Black CVAP, **NH DOJ Black= SR NH Black CVAP+SR NH Black/White CVAP

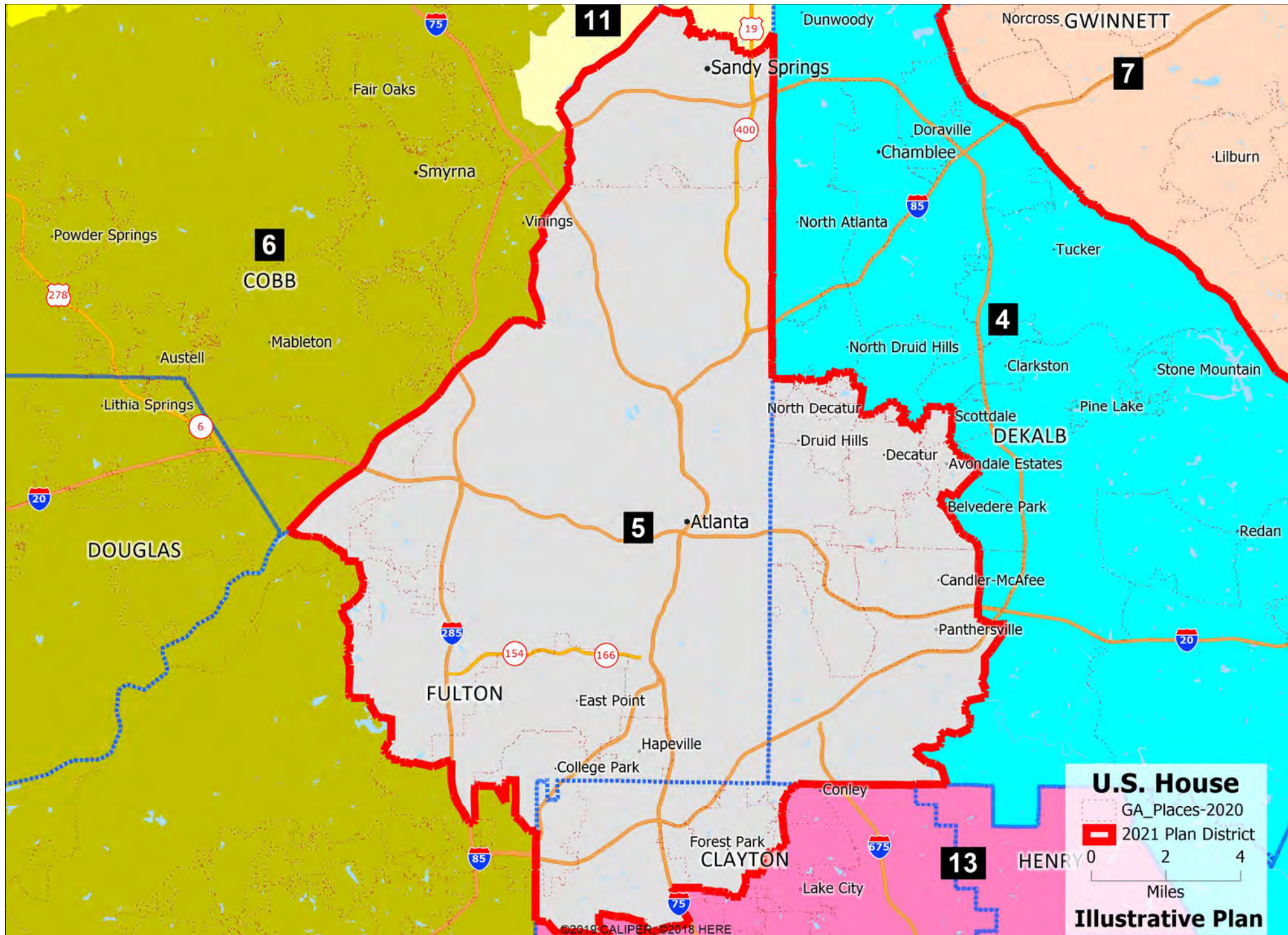
DECLARATION OF WILLIAM S. COOPER:
EXHIBIT I-2

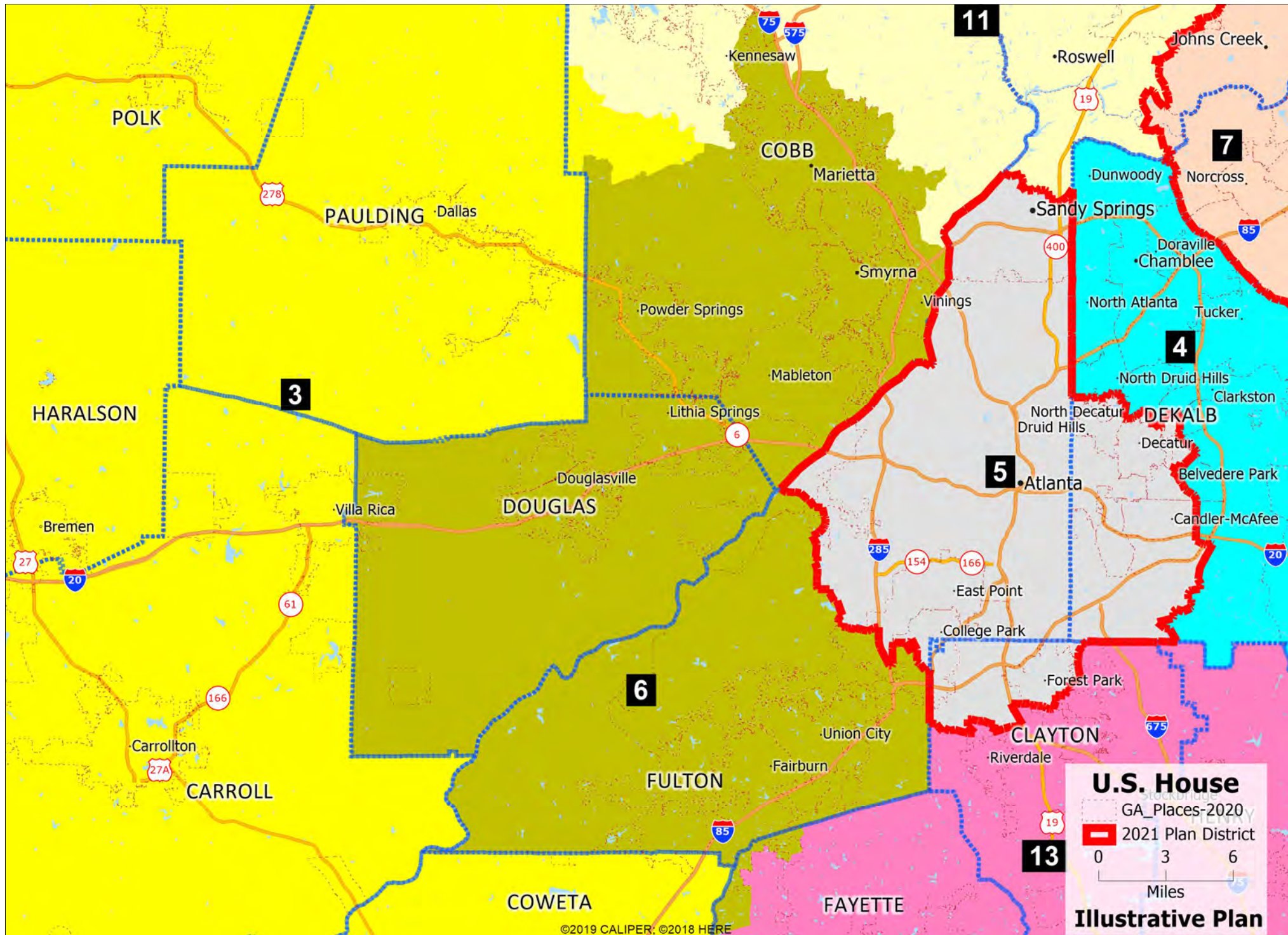


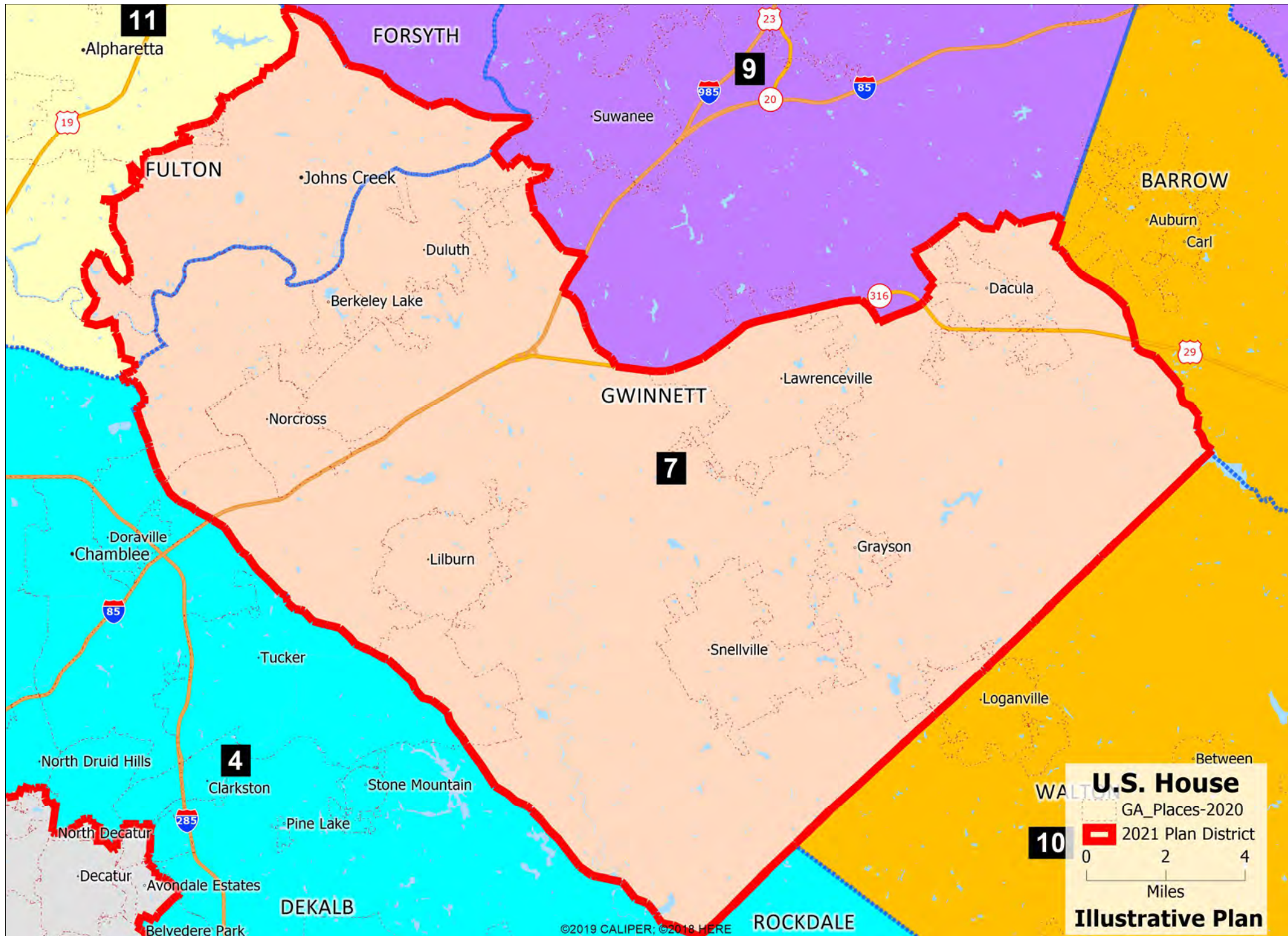


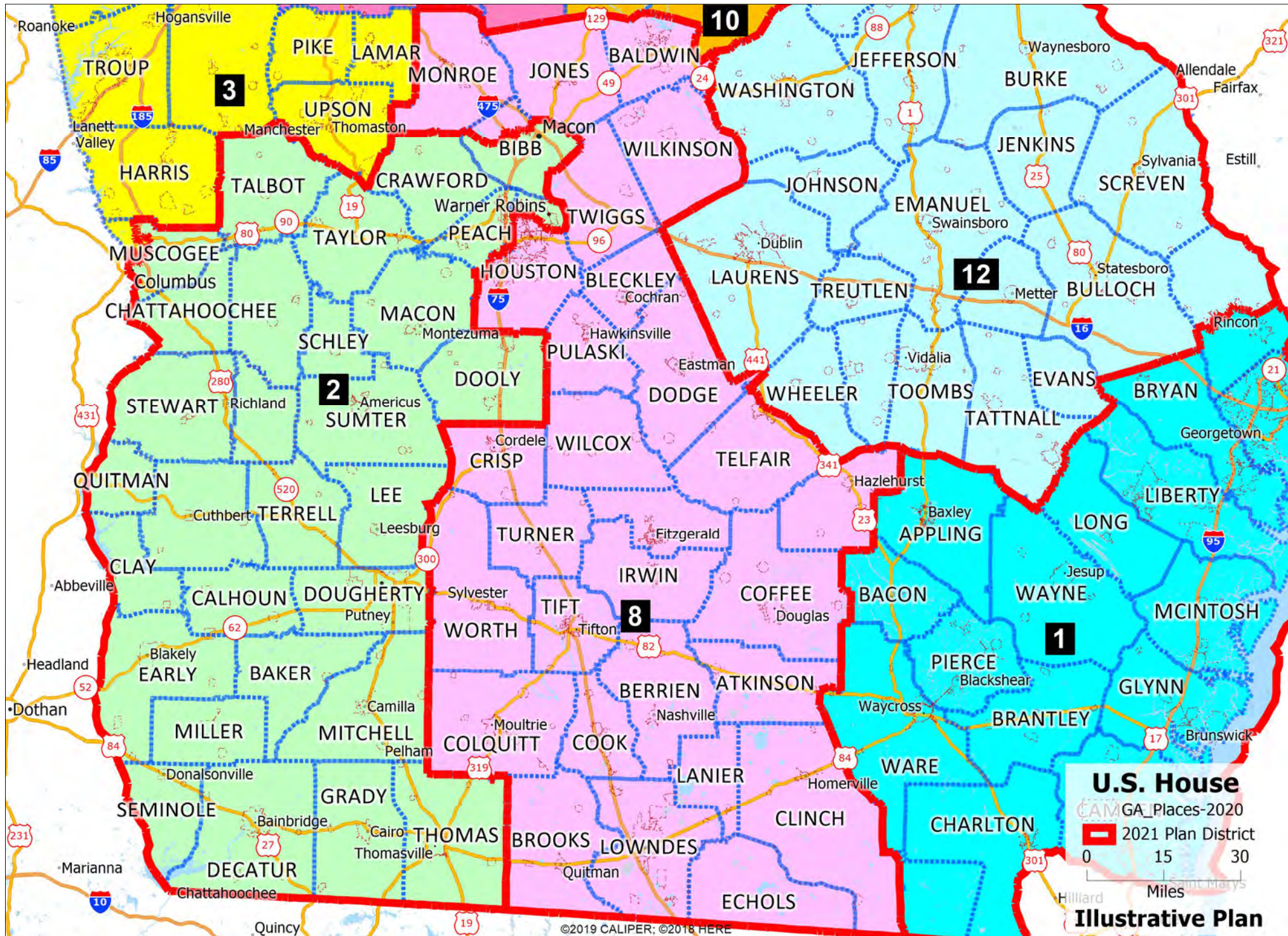


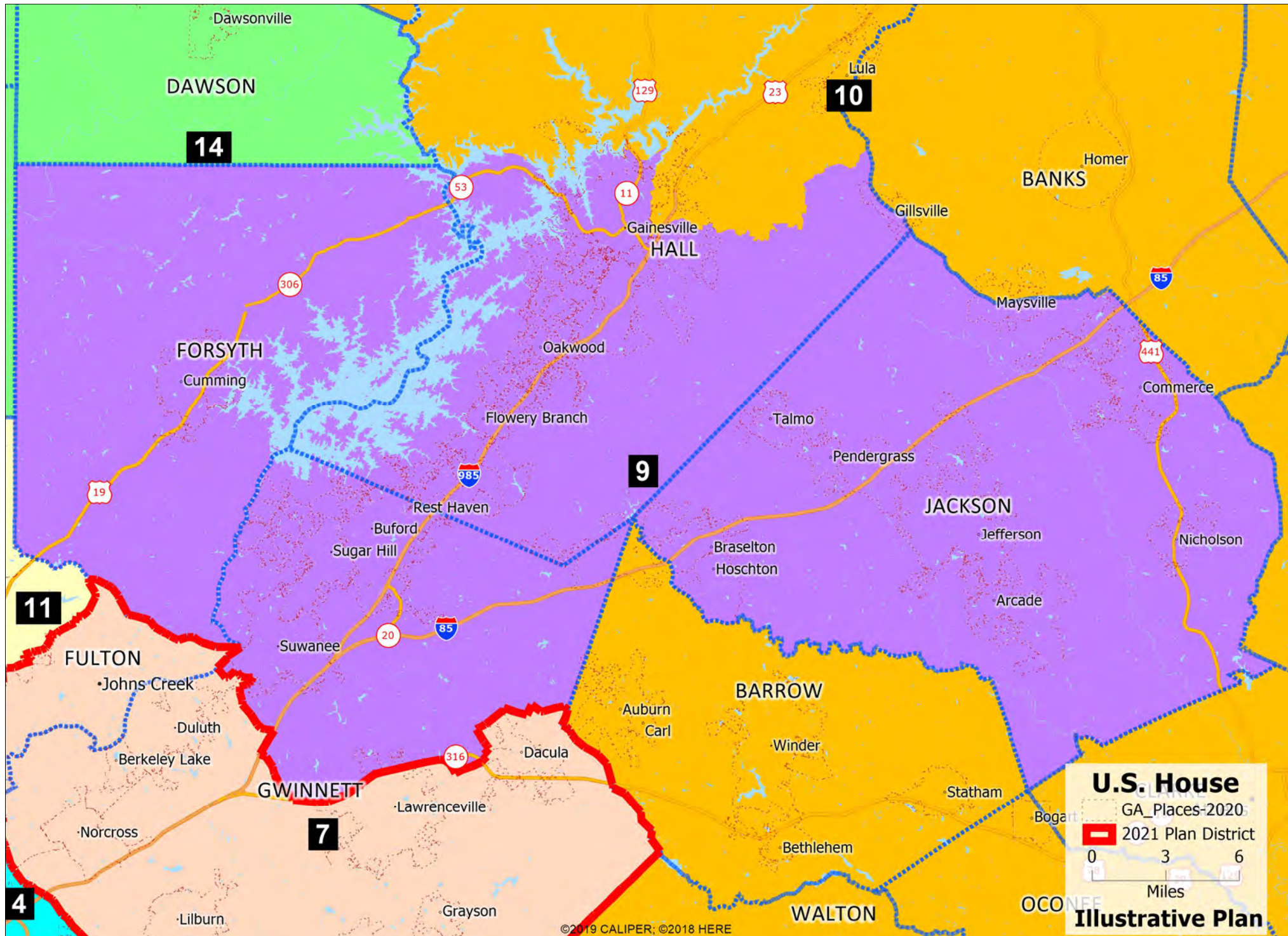


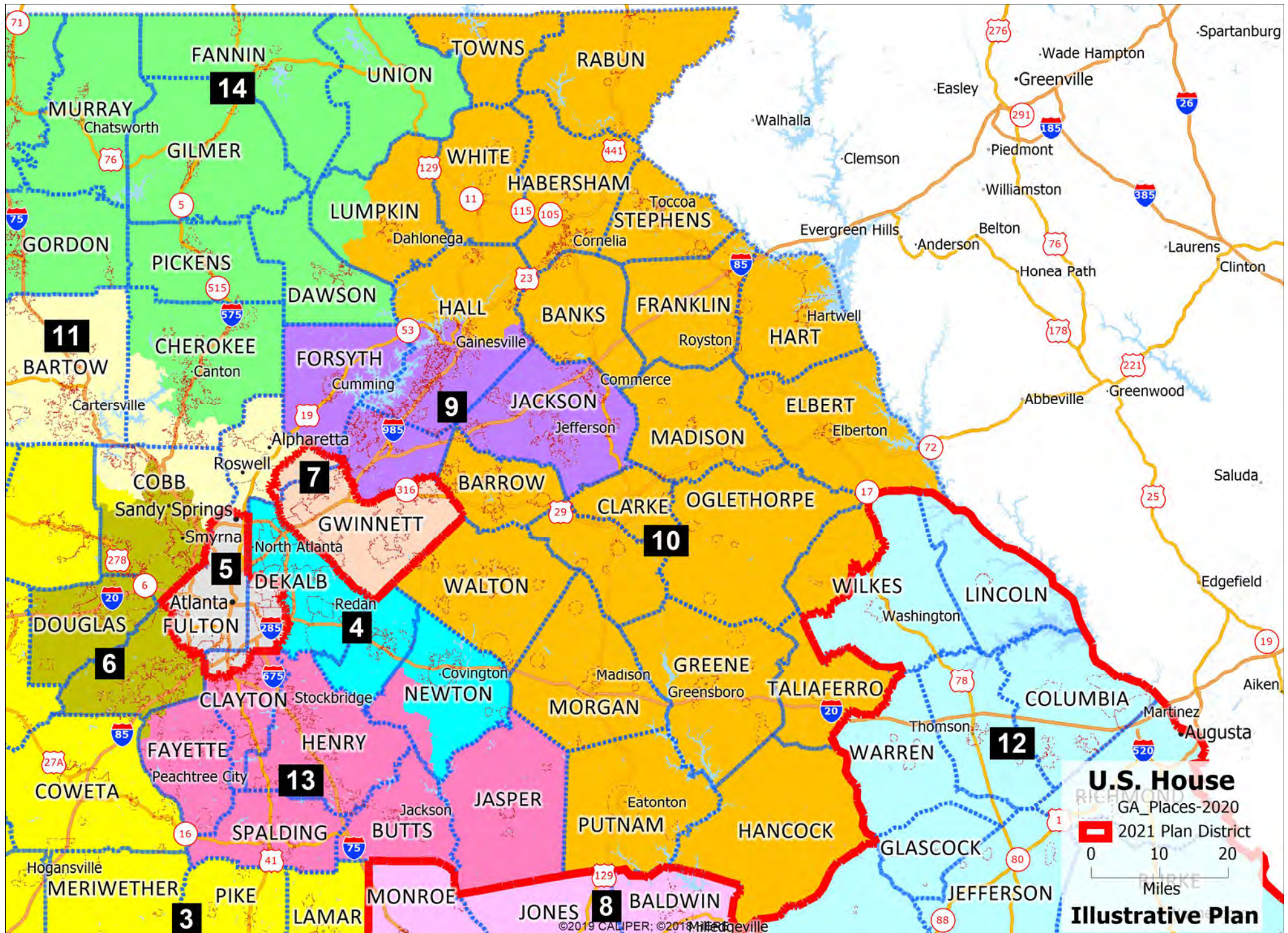


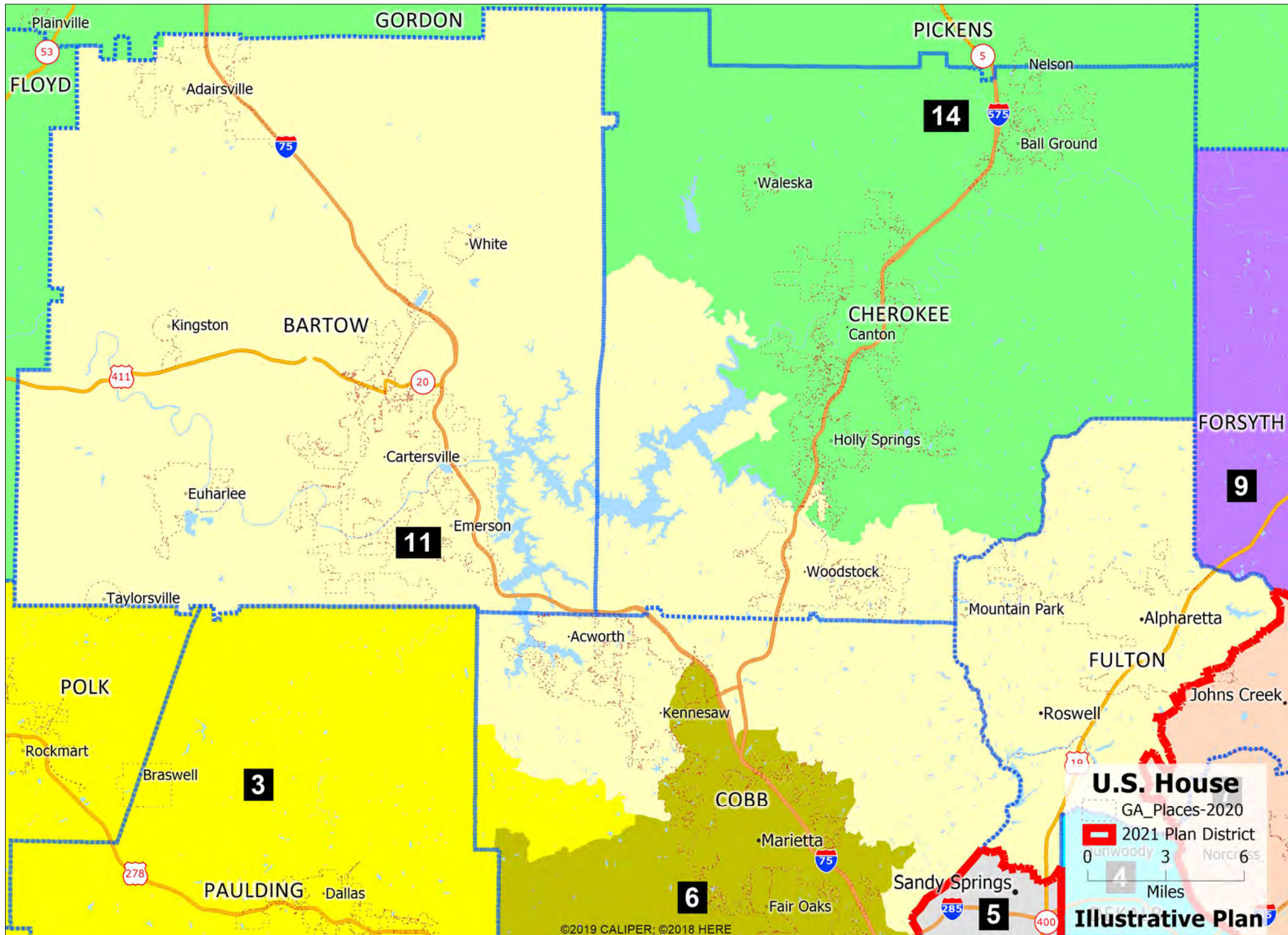


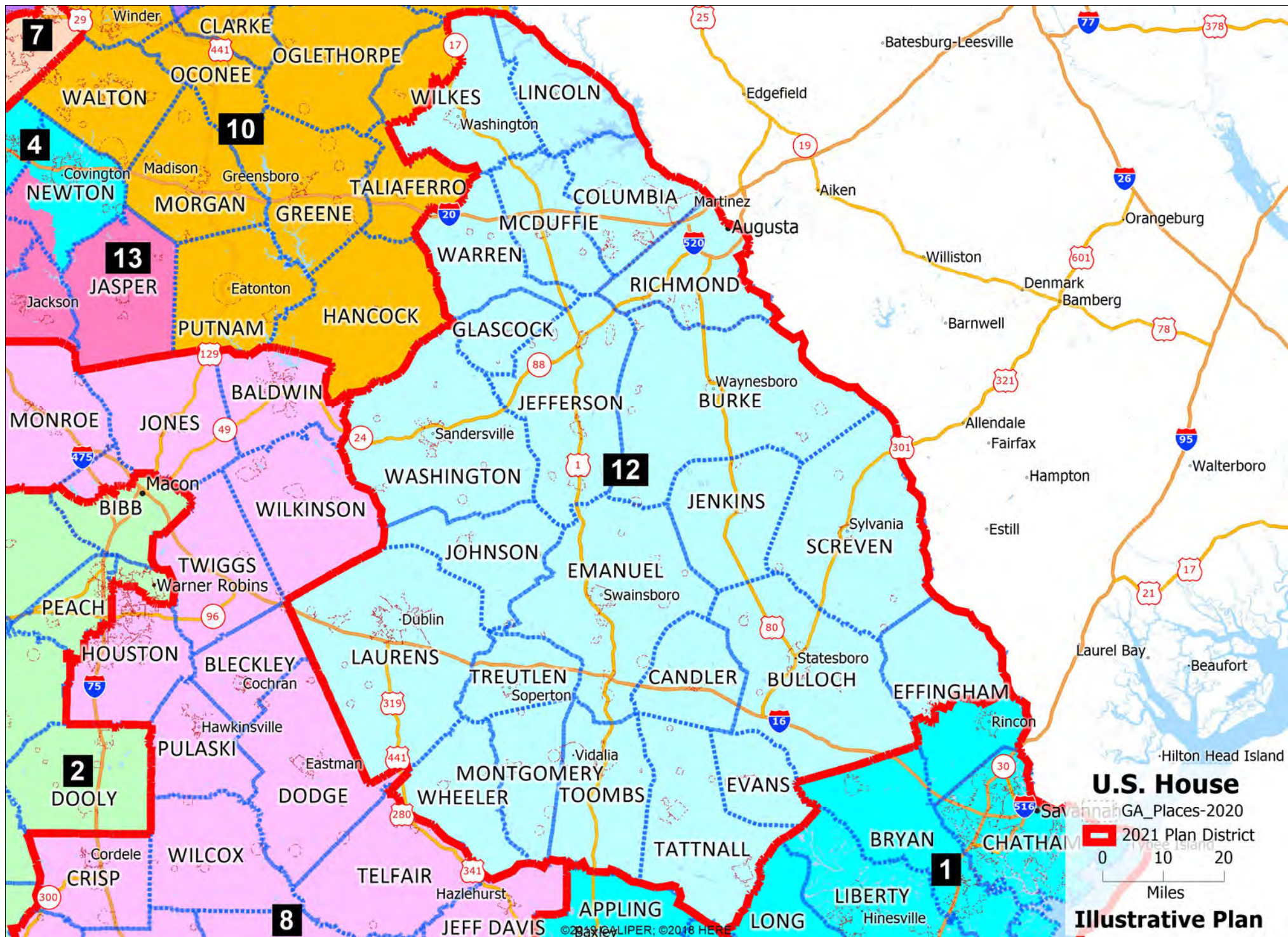


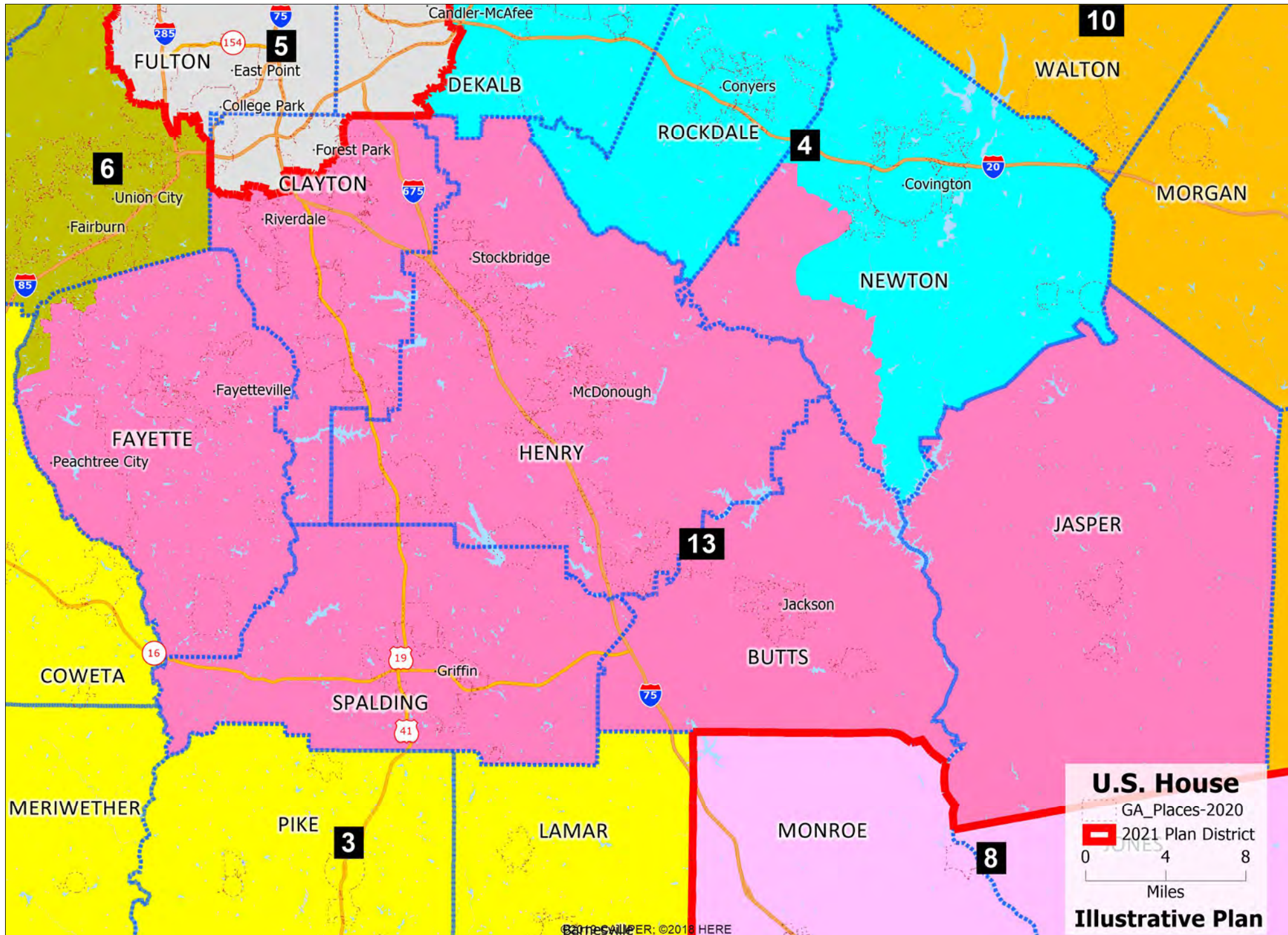


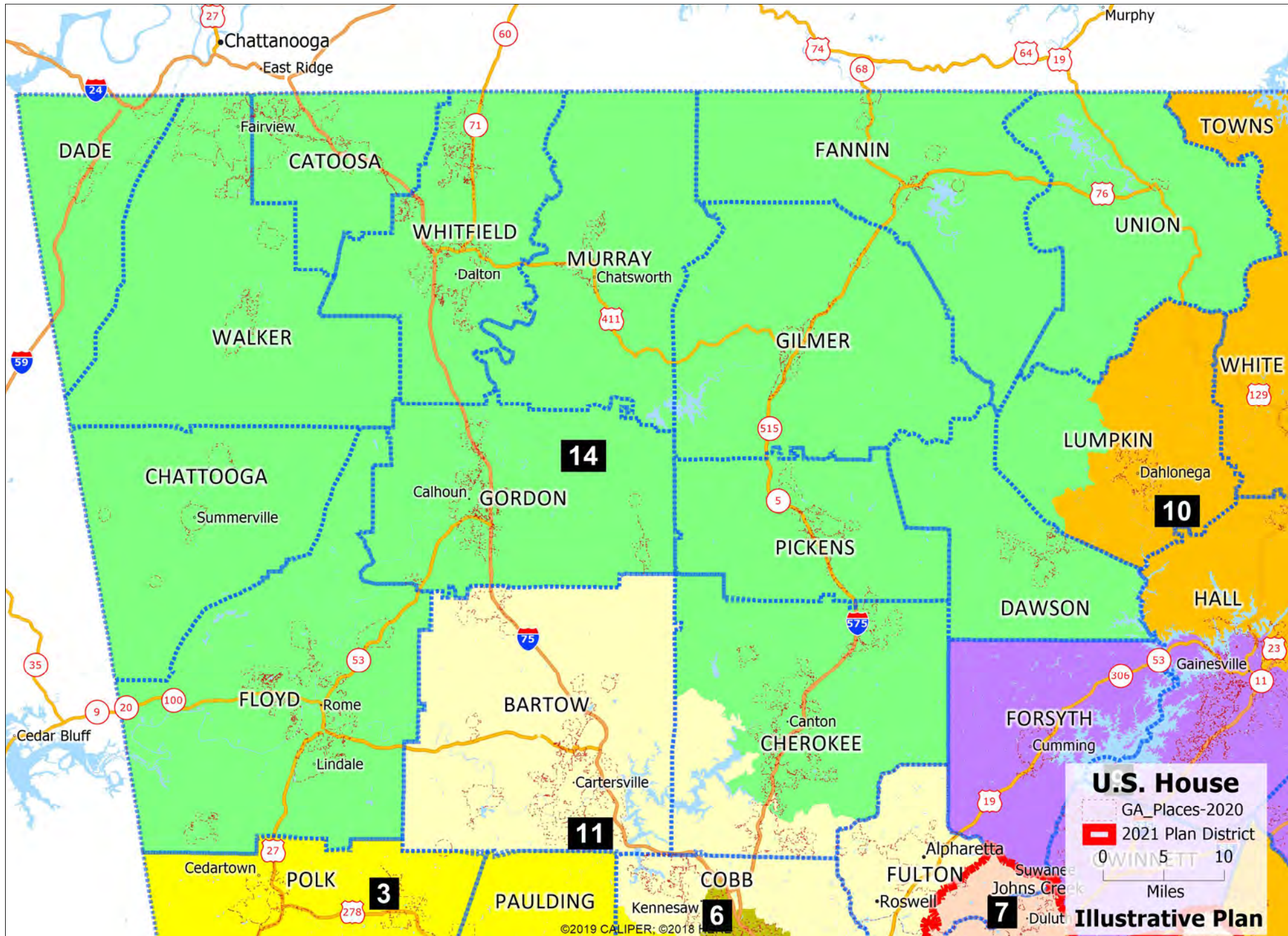












DECLARATION OF WILLIAM S. COOPER:
EXHIBIT I-3

User:

Plan Name: Illustrative Plan

Plan Type:

Plan Components with Population Detail

Monday, November 21, 2022

2:45 PM

	Total Population	NH_Wht	AP_Black	[Hispanic Origin]
District 001				
County: Appling GA				
Total:	18,444	12,674	3,647	1,825
		68.72%	19.77%	9.89%
Voting Age	13,958	10,048	2,540	1,118
		71.99%	18.20%	8.01%
County: Bacon GA				
Total:	11,140	8,103	1,970	875
		72.74%	17.68%	7.85%
Voting Age	8,310	6,374	1,245	547
		76.70%	14.98%	6.58%
County: Brantley GA				
Total:	18,021	16,317	733	326
		90.54%	4.07%	1.81%
Voting Age	13,692	12,522	470	212
		91.45%	3.43%	1.55%
County: Bryan GA				
Total:	44,738	31,321	7,463	3,269
		70.01%	16.68%	7.31%
Voting Age	31,828	23,033	5,025	1,919
		72.37%	15.79%	6.03%
County: Camden GA				
Total:	54,768	37,203	11,072	3,658
		67.93%	20.22%	6.68%
Voting Age	41,808	29,410	7,828	2,457
		70.35%	18.72%	5.88%
County: Charlton GA				
Total:	12,518	7,532	2,798	2,036
		60.17%	22.35%	16.26%
Voting Age	10,135	5,929	2,147	1,971
		58.50%	21.18%	19.45%
County: Chatham GA				
Total:	295,291	139,433	115,458	23,790
		47.22%	39.10%	8.06%
Voting Age	234,715	119,161	85,178	16,551
		50.77%	36.29%	7.05%
County: Effingham GA				
Total:	47,208	35,249	6,652	2,875
		74.67%	14.09%	6.09%
Voting Age	34,272	26,449	4,374	1,700
		77.17%	12.76%	4.96%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 001				
County: Glynn GA				
Total:	84,499	52,987 62.71%	22,098 26.15%	6,336 7.50%
Voting Age	66,468	44,302 66.65%	15,620 23.50%	4,116 6.19%
County: Liberty GA				
Total:	65,256	24,004 36.78%	31,146 47.73%	7,786 11.93%
Voting Age	48,014	19,065 39.71%	21,700 45.20%	5,231 10.89%
County: Long GA				
Total:	16,168	8,774 54.27%	4,734 29.28%	1,979 12.24%
Voting Age	11,234	6,422 57.17%	3,107 27.66%	1,227 10.92%
County: McIntosh GA				
Total:	10,975	7,060 64.33%	3,400 30.98%	231 2.10%
Voting Age	9,040	5,998 66.35%	2,641 29.21%	166 1.84%
County: Pierce GA				
Total:	19,716	16,403 83.20%	1,801 9.13%	998 5.06%
Voting Age	14,899	12,662 84.99%	1,262 8.47%	595 3.99%
County: Ware GA				
Total:	36,251	22,275 61.45%	11,421 31.51%	1,612 4.45%
Voting Age	27,788	17,818 64.12%	8,226 29.60%	1,012 3.64%
County: Wayne GA				
Total:	30,144	21,301 70.66%	6,390 21.20%	1,732 5.75%
Voting Age	23,105	16,754 72.51%	4,662 20.18%	1,116 4.83%
District 001 Total				
Total:	765,137	440,636 57.59%	230,783 30.16%	59,328 7.75%
Voting Age	589,266	355,947 60.41%	166,025 28.17%	39,938 6.78%
District 002				
County: Baker GA				
Total:	2,876	1,514 52.64%	1,178 40.96%	143 4.97%
Voting Age	2,275	1,235 54.29%	932 40.97%	77 3.38%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 002				
County: Bibb GA				
Total:	108,371	29,397 27.13%	72,197 66.62%	4,818 4.45%
Voting Age	82,489	25,121 30.45%	52,370 63.49%	3,351 4.06%
County: Calhoun GA				
Total:	5,573	1,766 31.69%	3,629 65.12%	149 2.67%
Voting Age	4,687	1,567 33.43%	2,998 63.96%	90 1.92%
County: Chattahoochee GA				
Total:	9,565	5,403 56.49%	1,825 19.08%	1,610 16.83%
Voting Age	7,199	4,212 58.51%	1,287 17.88%	1,160 16.11%
County: Clay GA				
Total:	2,848	1,143 40.13%	1,634 57.37%	41 1.44%
Voting Age	2,246	973 43.32%	1,231 54.81%	19 0.85%
County: Crawford GA				
Total:	12,130	8,866 73.09%	2,455 20.24%	415 3.42%
Voting Age	9,606	7,079 73.69%	1,938 20.17%	287 2.99%
County: Decatur GA				
Total:	29,367	14,280 48.63%	12,583 42.85%	1,911 6.51%
Voting Age	22,443	11,586 51.62%	9,189 40.94%	1,196 5.33%
County: Dooly GA				
Total:	11,208	4,611 41.14%	5,652 50.43%	797 7.11%
Voting Age	9,187	4,029 43.86%	4,526 49.27%	493 5.37%
County: Dougherty GA				
Total:	85,790	20,631 24.05%	61,457 71.64%	2,413 2.81%
Voting Age	66,266	17,909 27.03%	45,631 68.86%	1,591 2.40%
County: Early GA				
Total:	10,854	4,813 44.34%	5,688 52.40%	186 1.71%
Voting Age	8,315	3,985 47.93%	4,075 49.01%	113 1.36%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 002				
County: Grady GA				
Total:	26,236	14,715 56.09%	7,693 29.32%	3,273 12.48%
Voting Age	19,962	11,968 59.95%	5,678 28.44%	1,857 9.30%
County: Houston GA				
Total:	48,521	19,375 39.93%	22,637 46.65%	4,663 9.61%
Voting Age	36,233	16,052 44.30%	15,657 43.21%	2,988 8.25%
County: Lee GA				
Total:	33,163	22,758 68.62%	7,755 23.38%	953 2.87%
Voting Age	24,676	17,356 70.34%	5,503 22.30%	603 2.44%
County: Macon GA				
Total:	12,082	4,078 33.75%	7,296 60.39%	472 3.91%
Voting Age	9,938	3,379 34.00%	6,021 60.59%	322 3.24%
County: Marion GA				
Total:	7,498	4,486 59.83%	2,223 29.65%	560 7.47%
Voting Age	5,854	3,643 62.23%	1,687 28.82%	337 5.76%
County: Miller GA				
Total:	6,000	3,949 65.82%	1,831 30.52%	136 2.27%
Voting Age	4,749	3,239 68.20%	1,358 28.60%	92 1.94%
County: Mitchell GA				
Total:	21,755	10,106 46.45%	10,394 47.78%	964 4.43%
Voting Age	17,065	8,284 48.54%	7,917 46.39%	615 3.60%
County: Muscogee GA				
Total:	175,155	58,991 33.68%	95,521 54.54%	13,791 7.87%
Voting Age	132,158	48,043 36.35%	69,548 52.62%	9,099 6.88%
County: Peach GA				
Total:	27,981	12,119 43.31%	12,645 45.19%	2,547 9.10%
Voting Age	22,111	10,071 45.55%	9,720 43.96%	1,788 8.09%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 002				
County: Quitman GA				
Total:	2,235	1,190	965	31
		53.24%	43.18%	1.39%
Voting Age	1,870	1,037	765	18
		55.45%	40.91%	0.96%
County: Randolph GA				
Total:	6,425	2,250	3,947	143
		35.02%	61.43%	2.23%
Voting Age	4,977	1,922	2,913	82
		38.62%	58.53%	1.65%
County: Schley GA				
Total:	4,547	3,357	933	175
		73.83%	20.52%	3.85%
Voting Age	3,328	2,520	644	103
		75.72%	19.35%	3.09%
County: Seminole GA				
Total:	9,147	5,617	3,093	228
		61.41%	33.81%	2.49%
Voting Age	7,277	4,681	2,275	160
		64.33%	31.26%	2.20%
County: Stewart GA				
Total:	5,314	1,338	2,538	1,217
		25.18%	47.76%	22.90%
Voting Age	4,617	1,161	2,048	1,196
		25.15%	44.36%	25.90%
County: Sumter GA				
Total:	29,616	11,528	15,546	1,770
		38.92%	52.49%	5.98%
Voting Age	23,036	9,800	11,479	1,147
		42.54%	49.83%	4.98%
County: Talbot GA				
Total:	5,733	2,427	3,145	112
		42.33%	54.86%	1.95%
Voting Age	4,783	2,129	2,537	56
		44.51%	53.04%	1.17%
County: Taylor GA				
Total:	7,816	4,584	2,946	168
		58.65%	37.69%	2.15%
Voting Age	6,120	3,686	2,235	107
		60.23%	36.52%	1.75%
County: Terrell GA				
Total:	9,185	3,189	5,707	177
		34.72%	62.13%	1.93%
Voting Age	7,204	2,709	4,274	121
		37.60%	59.33%	1.68%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 002				
County: Thomas GA				
Total:	45,798	25,994	16,975	1,577
		56.76%	37.06%	3.44%
Voting Age	35,037	20,740	12,332	970
		59.19%	35.20%	2.77%
County: Webster GA				
Total:	2,348	1,136	1,107	59
		48.38%	47.15%	2.51%
Voting Age	1,847	931	844	36
		50.41%	45.70%	1.95%
District 002 Total				
Total:	765,137	305,611	393,195	45,499
		39.94%	51.39%	5.95%
Voting Age	587,555	251,047	289,612	30,074
		42.73%	49.29%	5.12%
District 003				
County: Carroll GA				
Total:	119,148	80,725	24,618	9,586
		67.75%	20.66%	8.05%
Voting Age	90,996	63,803	17,827	6,129
		70.12%	19.59%	6.74%
County: Cobb GA				
Total:	25,421	19,628	2,784	1,371
		77.21%	10.95%	5.39%
Voting Age	18,690	14,828	1,889	872
		79.34%	10.11%	4.67%
County: Coweta GA				
Total:	146,158	99,421	28,289	11,053
		68.02%	19.36%	7.56%
Voting Age	111,155	78,073	20,196	7,384
		70.24%	18.17%	6.64%
County: Haralson GA				
Total:	29,919	26,825	1,541	497
		89.66%	5.15%	1.66%
Voting Age	22,854	20,617	1,106	323
		90.21%	4.84%	1.41%
County: Harris GA				
Total:	34,668	25,925	5,742	1,417
		74.78%	16.56%	4.09%
Voting Age	26,799	20,298	4,431	908
		75.74%	16.53%	3.39%
County: Heard GA				
Total:	11,412	9,589	1,142	253
		84.03%	10.01%	2.22%
Voting Age	8,698	7,407	832	153
		85.16%	9.57%	1.76%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 003				
County: Lamar GA				
Total:	18,500	12,344	5,220	475
		66.72%	28.22%	2.57%
Voting Age	14,541	9,852	4,017	323
		67.75%	27.63%	2.22%
County: Meriwether GA				
Total:	20,613	12,084	7,547	475
		58.62%	36.61%	2.30%
Voting Age	16,526	9,994	5,845	299
		60.47%	35.37%	1.81%
County: Muscogee GA				
Total:	31,767	20,092	6,691	2,722
		63.25%	21.06%	8.57%
Voting Age	24,894	16,592	4,753	1,795
		66.65%	19.09%	7.21%
County: Paulding GA				
Total:	168,661	108,444	41,296	12,564
		64.30%	24.48%	7.45%
Voting Age	123,998	83,066	28,164	7,974
		66.99%	22.71%	6.43%
County: Pike GA				
Total:	18,889	16,313	1,613	348
		86.36%	8.54%	1.84%
Voting Age	14,337	12,422	1,254	207
		86.64%	8.75%	1.44%
County: Polk GA				
Total:	42,853	30,161	5,816	5,585
		70.38%	13.57%	13.03%
Voting Age	32,238	24,049	3,991	3,252
		74.60%	12.38%	10.09%
County: Troup GA				
Total:	69,426	38,099	25,473	2,956
		54.88%	36.69%	4.26%
Voting Age	52,581	30,377	18,202	1,822
		57.77%	34.62%	3.47%
County: Upson GA				
Total:	27,700	18,009	8,324	633
		65.01%	30.05%	2.29%
Voting Age	21,711	14,548	6,202	411
		67.01%	28.57%	1.89%
District 003 Total				
Total:	765,135	517,659	166,096	49,935
		67.66%	21.71%	6.53%
Voting Age	580,018	405,926	118,709	31,852
		69.99%	20.47%	5.49%
District 004				

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 004				
County: DeKalb GA				
Total:	601,451	153,733 25.56%	322,421 53.61%	74,201 12.34%
Voting Age	465,661	129,178 27.74%	247,548 53.16%	50,261 10.79%
County: Newton GA				
Total:	70,115	33,771 48.17%	30,394 43.35%	4,015 5.73%
Voting Age	53,476	27,197 50.86%	22,187 41.49%	2,597 4.86%
County: Rockdale GA				
Total:	93,570	24,500 26.18%	57,204 61.13%	9,540 10.20%
Voting Age	71,503	21,457 30.01%	41,935 58.65%	6,089 8.52%
District 004 Total				
Total:	765,136	212,004 27.71%	410,019 53.59%	87,756 11.47%
Voting Age	590,640	177,832 30.11%	311,670 52.77%	58,947 9.98%
District 005				
County: Clayton GA				
Total:	37,919	2,578 6.80%	27,594 72.77%	6,497 17.13%
Voting Age	27,885	2,344 8.41%	20,301 72.80%	4,185 15.01%
County: DeKalb GA				
Total:	162,931	62,162 38.15%	85,030 52.19%	7,270 4.46%
Voting Age	129,615	50,983 39.33%	66,682 51.45%	5,245 4.05%
County: Fulton GA				
Total:	564,287	209,079 37.05%	280,198 49.66%	42,729 7.57%
Voting Age	464,015	182,325 39.29%	221,288 47.69%	32,002 6.90%
District 005 Total				
Total:	765,137	273,819 35.79%	392,822 51.34%	56,496 7.38%
Voting Age	621,515	235,652 37.92%	308,271 49.60%	41,432 6.67%
District 006				
County: Cobb GA				
Total:	452,386	164,732 36.41%	175,347 38.76%	83,302 18.41%
Voting Age	352,053	141,014 40.05%	131,674 37.40%	55,556 15.78%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 006				
County: Douglas GA				
Total:	144,237	49,877 34.58%	74,260 51.48%	16,035 11.12%
Voting Age	108,428	41,416 38.20%	53,377 49.23%	10,212 9.42%
County: Fayette GA				
Total:	4,143	2,109 50.91%	998 24.09%	891 21.51%
Voting Age	3,000	1,700 56.67%	652 21.73%	543 18.10%
County: Fulton GA				
Total:	164,371	9,267 5.64%	146,286 89.00%	8,173 4.97%
Voting Age	123,766	8,240 6.66%	109,273 88.29%	5,487 4.43%
District 006 Total				
Total:	765,137	225,985 29.54%	396,891 51.87%	108,401 14.17%
Voting Age	587,247	192,370 32.76%	294,976 50.23%	71,798 12.23%
District 007				
County: Fulton GA				
Total:	92,558	45,964 49.66%	11,462 12.38%	6,614 7.15%
Voting Age	69,229	36,341 52.49%	8,135 11.75%	4,468 6.45%
County: Gwinnett GA				
Total:	672,579	179,941 26.75%	228,255 33.94%	175,237 26.05%
Voting Age	497,705	149,497 30.04%	160,936 32.34%	116,136 23.33%
District 007 Total				
Total:	765,137	225,905 29.52%	239,717 31.33%	181,851 23.77%
Voting Age	566,934	185,838 32.78%	169,071 29.82%	120,604 21.27%
District 008				
County: Atkinson GA				
Total:	8,286	4,801 57.94%	1,284 15.50%	2,048 24.72%
Voting Age	6,129	3,787 61.79%	937 15.29%	1,282 20.92%
County: Baldwin GA				
Total:	43,799	22,432 51.22%	18,985 43.35%	1,139 2.60%
Voting Age	35,732	19,377 54.23%	14,515 40.62%	835 2.34%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 008				
County: Ben Hill GA				
Total:	17,194	9,219	6,537	1,054
		53.62%	38.02%	6.13%
Voting Age	13,165	7,459	4,745	653
		56.66%	36.04%	4.96%
County: Berrien GA				
Total:	18,160	14,396	2,198	1,045
		79.27%	12.10%	5.75%
Voting Age	13,690	11,181	1,499	622
		81.67%	10.95%	4.54%
County: Bibb GA				
Total:	48,975	27,390	16,668	1,919
		55.93%	34.03%	3.92%
Voting Age	38,413	22,858	11,900	1,383
		59.51%	30.98%	3.60%
County: Bleckley GA				
Total:	12,583	8,867	2,951	469
		70.47%	23.45%	3.73%
Voting Age	9,613	7,032	2,036	311
		73.15%	21.18%	3.24%
County: Brooks GA				
Total:	16,301	9,066	5,958	955
		55.62%	36.55%	5.86%
Voting Age	12,747	7,483	4,357	635
		58.70%	34.18%	4.98%
County: Clinch GA				
Total:	6,749	4,256	2,096	253
		63.06%	31.06%	3.75%
Voting Age	5,034	3,372	1,406	156
		66.98%	27.93%	3.10%
County: Coffee GA				
Total:	43,092	24,158	12,575	5,430
		56.06%	29.18%	12.60%
Voting Age	32,419	19,146	9,191	3,324
		59.06%	28.35%	10.25%
County: Colquitt GA				
Total:	45,898	25,588	10,648	8,709
		55.75%	23.20%	18.97%
Voting Age	34,193	20,507	7,461	5,467
		59.97%	21.82%	15.99%
County: Cook GA				
Total:	17,229	10,658	5,014	1,134
		61.86%	29.10%	6.58%
Voting Age	12,938	8,310	3,595	704
		64.23%	27.79%	5.44%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 008				
County: Crisp GA				
Total:	20,128	9,892	9,194	634
		49.15%	45.68%	3.15%
Voting Age	15,570	8,248	6,603	414
		52.97%	42.41%	2.66%
County: Dodge GA				
Total:	19,925	12,865	6,148	620
		64.57%	30.86%	3.11%
Voting Age	15,709	10,360	4,725	406
		65.95%	30.08%	2.58%
County: Echols GA				
Total:	3,697	2,328	193	1,091
		62.97%	5.22%	29.51%
Voting Age	2,709	1,856	121	667
		68.51%	4.47%	24.62%
County: Houston GA				
Total:	115,112	66,836	33,883	7,144
		58.06%	29.43%	6.21%
Voting Age	85,885	51,966	23,948	4,542
		60.51%	27.88%	5.29%
County: Irwin GA				
Total:	9,666	6,402	2,333	663
		66.23%	24.14%	6.86%
Voting Age	7,547	5,047	1,720	545
		66.87%	22.79%	7.22%
County: Jeff Davis GA				
Total:	14,779	9,950	2,493	2,047
		67.33%	16.87%	13.85%
Voting Age	10,856	7,643	1,752	1,233
		70.40%	16.14%	11.36%
County: Jones GA				
Total:	28,347	20,074	7,114	476
		70.82%	25.10%	1.68%
Voting Age	21,575	15,428	5,341	302
		71.51%	24.76%	1.40%
County: Lanier GA				
Total:	9,877	6,595	2,369	572
		66.77%	23.99%	5.79%
Voting Age	7,326	5,010	1,683	370
		68.39%	22.97%	5.05%
County: Lowndes GA				
Total:	118,251	59,306	46,758	7,872
		50.15%	39.54%	6.66%
Voting Age	89,031	47,140	33,302	5,201
		52.95%	37.40%	5.84%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 008				
County: Monroe GA				
Total:	27,957	19,954 71.37%	6,444 23.05%	714 2.55%
Voting Age	21,913	15,771 71.97%	5,068 23.13%	464 2.12%
County: Pulaski GA				
Total:	9,855	6,022 61.11%	3,250 32.98%	327 3.32%
Voting Age	8,012	5,027 62.74%	2,564 32.00%	224 2.80%
County: Telfair GA				
Total:	12,477	5,970 47.85%	4,754 38.10%	1,928 15.45%
Voting Age	10,190	4,802 47.12%	3,806 37.35%	1,757 17.24%
County: Tift GA				
Total:	41,344	22,189 53.67%	12,734 30.80%	5,219 12.62%
Voting Age	31,224	18,011 57.68%	8,963 28.71%	3,295 10.55%
County: Turner GA				
Total:	9,006	4,700 52.19%	3,813 42.34%	372 4.13%
Voting Age	6,960	3,891 55.91%	2,752 39.54%	256 3.68%
County: Twiggs GA				
Total:	8,022	4,487 55.93%	3,226 40.21%	124 1.55%
Voting Age	6,589	3,733 56.66%	2,627 39.87%	79 1.20%
County: Wilcox GA				
Total:	8,766	5,185 59.15%	3,161 36.06%	272 3.10%
Voting Age	7,218	4,215 58.40%	2,693 37.31%	209 2.90%
County: Wilkinson GA				
Total:	8,877	5,110 57.56%	3,330 37.51%	239 2.69%
Voting Age	7,026	4,165 59.28%	2,549 36.28%	152 2.16%
County: Worth GA				
Total:	20,784	14,427 69.41%	5,517 26.54%	381 1.83%
Voting Age	16,444	11,747 71.44%	4,108 24.98%	244 1.48%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Black	[Hispanic Origin]
District 008				
District 008 Total				
Total:	765,136	443,123 57.91%	241,628 31.58%	54,850 7.17%
Voting Age	585,857	354,572 60.52%	175,967 30.04%	35,732 6.10%
District 009				
County: Forsyth GA				
Total:	251,283	159,407 63.44%	13,222 5.26%	25,226 10.04%
Voting Age	181,193	122,017 67.34%	8,751 4.83%	16,204 8.94%
County: Gwinnett GA				
Total:	284,483	130,642 45.92%	59,432 20.89%	45,223 15.90%
Voting Age	211,779	102,544 48.42%	41,826 19.75%	30,523 14.41%
County: Hall GA				
Total:	153,463	80,227 52.28%	15,257 9.94%	51,232 33.38%
Voting Age	114,821	66,144 57.61%	10,945 9.53%	32,465 28.27%
County: Jackson GA				
Total:	75,907	59,064 77.81%	6,148 8.10%	6,712 8.84%
Voting Age	56,451	45,015 79.74%	4,268 7.56%	4,261 7.55%
District 009 Total				
Total:	765,136	429,340 56.11%	94,059 12.29%	128,393 16.78%
Voting Age	564,244	335,720 59.50%	65,790 11.66%	83,453 14.79%
District 010				
County: Banks GA				
Total:	18,035	15,578 86.38%	589 3.27%	1,164 6.45%
Voting Age	13,900	12,278 88.33%	365 2.63%	721 5.19%
County: Barrow GA				
Total:	83,505	55,582 66.56%	11,907 14.26%	10,560 12.65%
Voting Age	62,195	43,241 69.52%	8,222 13.22%	6,726 10.81%
County: Clarke GA				
Total:	128,671	72,201 56.11%	33,672 26.17%	14,336 11.14%
Voting Age	106,830	64,531 60.41%	24,776 23.19%	10,213 9.56%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 010				
County: Elbert GA				
Total:	19,637	12,610 64.22%	5,520 28.11%	996 5.07%
Voting Age	15,493	10,322 66.62%	4,122 26.61%	660 4.26%
County: Franklin GA				
Total:	23,424	19,262 82.23%	2,207 9.42%	1,121 4.79%
Voting Age	18,307	15,466 84.48%	1,523 8.32%	678 3.70%
County: Greene GA				
Total:	18,915	11,126 58.82%	6,027 31.86%	1,289 6.81%
Voting Age	15,358	9,675 63.00%	4,470 29.11%	826 5.38%
County: Habersham GA				
Total:	46,031	34,694 75.37%	2,165 4.70%	6,880 14.95%
Voting Age	35,878	28,299 78.88%	1,675 4.67%	4,115 11.47%
County: Hall GA				
Total:	49,673	40,191 80.91%	1,749 3.52%	5,778 11.63%
Voting Age	39,023	32,656 83.68%	1,149 2.94%	3,681 9.43%
County: Hancock GA				
Total:	8,735	2,413 27.62%	6,131 70.19%	63 0.72%
Voting Age	7,487	2,220 29.65%	5,108 68.22%	47 0.63%
County: Hart GA				
Total:	25,828	19,250 74.53%	4,732 18.32%	931 3.60%
Voting Age	20,436	15,761 77.12%	3,447 16.87%	578 2.83%
County: Lumpkin GA				
Total:	29,598	25,718 86.89%	643 2.17%	1,654 5.59%
Voting Age	24,614	21,601 87.76%	482 1.96%	1,247 5.07%
County: Madison GA				
Total:	30,120	23,549 78.18%	3,196 10.61%	1,956 6.49%
Voting Age	23,112	18,643 80.66%	2,225 9.63%	1,198 5.18%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 010				
County: Morgan GA				
Total:	20,097	14,487 72.09%	4,339 21.59%	712 3.54%
Voting Age	15,574	11,452 73.53%	3,280 21.06%	434 2.79%
County: Oconee GA				
Total:	41,799	33,886 81.07%	2,280 5.45%	2,347 5.61%
Voting Age	30,221	24,942 82.53%	1,660 5.49%	1,405 4.65%
County: Oglethorpe GA				
Total:	14,825	10,903 73.54%	2,468 16.65%	869 5.86%
Voting Age	11,639	8,799 75.60%	1,853 15.92%	531 4.56%
County: Putnam GA				
Total:	22,047	14,316 64.93%	5,701 25.86%	1,557 7.06%
Voting Age	17,847	12,209 68.41%	4,229 23.70%	1,031 5.78%
County: Rabun GA				
Total:	16,883	14,625 86.63%	210 1.24%	1,452 8.60%
Voting Age	13,767	12,236 88.88%	129 0.94%	928 6.74%
County: Stephens GA				
Total:	26,784	21,323 79.61%	3,527 13.17%	857 3.20%
Voting Age	21,163	17,310 81.79%	2,467 11.66%	578 2.73%
County: Taliaferro GA				
Total:	1,559	591 37.91%	876 56.19%	69 4.43%
Voting Age	1,289	506 39.26%	722 56.01%	46 3.57%
County: Towns GA				
Total:	12,493	11,469 91.80%	168 1.34%	415 3.32%
Voting Age	10,923	10,100 92.47%	137 1.25%	338 3.09%
County: Walton GA				
Total:	96,673	68,499 70.86%	18,804 19.45%	5,228 5.41%
Voting Age	73,098	53,647 73.39%	13,165 18.01%	3,236 4.43%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 010				
County: White GA				
Total:	28,003	24,959	721	913
		89.13%	2.57%	3.26%
Voting Age	22,482	20,318	484	605
		90.37%	2.15%	2.69%
County: Wilkes GA				
Total:	1,802	1,080	567	97
		59.93%	31.47%	5.38%
Voting Age	1,491	897	488	54
		60.16%	32.73%	3.62%
District 010 Total				
Total:	765,137	548,312	118,199	61,244
		71.66%	15.45%	8.00%
Voting Age	602,127	447,109	86,178	39,876
		74.25%	14.31%	6.62%
District 011				
County: Bartow GA				
Total:	108,901	80,159	13,395	10,751
		73.61%	12.30%	9.87%
Voting Age	83,570	63,759	9,377	6,817
		76.29%	11.22%	8.16%
County: Cherokee GA				
Total:	122,400	86,657	12,310	15,362
		70.80%	10.06%	12.55%
Voting Age	93,948	69,068	8,613	10,317
		73.52%	9.17%	10.98%
County: Cobb GA				
Total:	288,342	184,822	44,985	26,567
		64.10%	15.60%	9.21%
Voting Age	221,105	147,458	32,578	18,077
		66.69%	14.73%	8.18%
County: Fulton GA				
Total:	245,494	140,483	39,678	28,786
		57.22%	16.16%	11.73%
Voting Age	190,172	113,635	29,939	19,957
		59.75%	15.74%	10.49%
District 011 Total				
Total:	765,137	492,121	110,368	81,466
		64.32%	14.42%	10.65%
Voting Age	588,795	393,920	80,507	55,168
		66.90%	13.67%	9.37%
District 012				
County: Bulloch GA				
Total:	81,099	49,712	24,375	4,180
		61.30%	30.06%	5.15%
Voting Age	64,494	41,041	18,220	3,021
		63.64%	28.25%	4.68%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 012				
County: Burke GA				
Total:	24,596	11,941	11,430	777
		48.55%	46.47%	3.16%
Voting Age	18,778	9,566	8,362	494
		50.94%	44.53%	2.63%
County: Candler GA				
Total:	10,981	6,567	2,807	1,378
		59.80%	25.56%	12.55%
Voting Age	8,241	5,229	2,009	835
		63.45%	24.38%	10.13%
County: Columbia GA				
Total:	156,010	99,111	32,516	11,858
		63.53%	20.84%	7.60%
Voting Age	114,823	76,070	22,273	7,355
		66.25%	19.40%	6.41%
County: Effingham GA				
Total:	17,561	12,955	3,383	617
		73.77%	19.26%	3.51%
Voting Age	13,023	9,788	2,457	354
		75.16%	18.87%	2.72%
County: Emanuel GA				
Total:	22,768	13,815	7,556	993
		60.68%	33.19%	4.36%
Voting Age	17,320	11,013	5,404	589
		63.59%	31.20%	3.40%
County: Evans GA				
Total:	10,774	6,038	3,273	1,237
		56.04%	30.38%	11.48%
Voting Age	8,127	4,826	2,410	731
		59.38%	29.65%	8.99%
County: Glascock GA				
Total:	2,884	2,573	226	52
		89.22%	7.84%	1.80%
Voting Age	2,236	2,003	167	31
		89.58%	7.47%	1.39%
County: Jefferson GA				
Total:	15,709	6,834	8,208	462
		43.50%	52.25%	2.94%
Voting Age	12,301	5,536	6,324	280
		45.00%	51.41%	2.28%
County: Jenkins GA				
Total:	8,674	4,611	3,638	303
		53.16%	41.94%	3.49%
Voting Age	7,005	3,874	2,843	194
		55.30%	40.59%	2.77%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 012				
County: Johnson GA				
Total:	9,189	5,800	3,124	117
		63.12%	34.00%	1.27%
Voting Age	7,474	4,790	2,513	82
		64.09%	33.62%	1.10%
County: Laurens GA				
Total:	49,570	27,881	19,132	1,424
		56.25%	38.60%	2.87%
Voting Age	37,734	22,229	13,695	923
		58.91%	36.29%	2.45%
County: Lincoln GA				
Total:	7,690	5,196	2,212	92
		67.57%	28.76%	1.20%
Voting Age	6,270	4,316	1,728	54
		68.84%	27.56%	0.86%
County: McDuffie GA				
Total:	21,632	11,417	9,045	790
		52.78%	41.81%	3.65%
Voting Age	16,615	9,359	6,425	536
		56.33%	38.67%	3.23%
County: Montgomery GA				
Total:	8,610	5,665	2,224	571
		65.80%	25.83%	6.63%
Voting Age	6,792	4,527	1,781	377
		66.65%	26.22%	5.55%
County: Richmond GA				
Total:	206,607	68,397	119,970	11,449
		33.10%	58.07%	5.54%
Voting Age	160,899	58,403	87,930	8,445
		36.30%	54.65%	5.25%
County: Screven GA				
Total:	14,067	8,018	5,527	287
		57.00%	39.29%	2.04%
Voting Age	10,893	6,387	4,144	188
		58.63%	38.04%	1.73%
County: Tattnall GA				
Total:	22,842	13,825	6,331	2,303
		60.52%	27.72%	10.08%
Voting Age	17,654	11,020	4,886	1,419
		62.42%	27.68%	8.04%
County: Toombs GA				
Total:	27,030	16,007	7,402	3,044
		59.22%	27.38%	11.26%
Voting Age	20,261	12,810	5,036	1,978
		63.22%	24.86%	9.76%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 012				
County: Treutlen GA				
Total:	6,406	4,065 63.46%	2,114 33.00%	170 2.65%
Voting Age	4,934	3,272 66.32%	1,514 30.69%	98 1.99%
County: Warren GA				
Total:	5,215	1,974 37.85%	3,128 59.98%	53 1.02%
Voting Age	4,159	1,716 41.26%	2,360 56.74%	46 1.11%
County: Washington GA				
Total:	19,988	8,412 42.09%	10,969 54.88%	334 1.67%
Voting Age	15,709	6,944 44.20%	8,333 53.05%	235 1.50%
County: Wheeler GA				
Total:	7,471	4,157 55.64%	2,949 39.47%	272 3.64%
Voting Age	6,217	3,418 54.98%	2,561 41.19%	174 2.80%
County: Wilkes GA				
Total:	7,763	3,872 49.88%	3,422 44.08%	302 3.89%
Voting Age	6,160	3,257 52.87%	2,583 41.93%	189 3.07%
District 012 Total				
Total:	765,136	398,843 52.13%	294,961 38.55%	43,065 5.63%
Voting Age	588,119	321,394 54.65%	215,958 36.72%	28,628 4.87%
District 013				
County: Butts GA				
Total:	25,434	16,628 65.38%	7,212 28.36%	803 3.16%
Voting Age	20,360	13,510 66.36%	5,660 27.80%	559 2.75%
County: Clayton GA				
Total:	259,676	23,324 8.98%	188,757 72.69%	36,049 13.88%
Voting Age	192,693	21,052 10.93%	138,553 71.90%	23,193 12.04%
County: Fayette GA				
Total:	115,051	66,035 57.40%	31,078 27.01%	8,589 7.47%
Voting Age	88,798	53,402 60.14%	23,076 25.99%	5,625 6.33%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 013				
County: Henry GA				
Total:	240,712	86,297 35.85%	125,211 52.02%	18,437 7.66%
Voting Age	179,973	69,744 38.75%	89,657 49.82%	12,030 6.68%
County: Jasper GA				
Total:	14,588	10,771 73.83%	2,676 18.34%	684 4.69%
Voting Age	11,118	8,400 75.55%	1,966 17.68%	402 3.62%
County: Newton GA				
Total:	42,368	12,975 30.62%	25,507 60.20%	3,149 7.43%
Voting Age	31,272	10,434 33.37%	18,246 58.35%	1,964 6.28%
County: Spalding GA				
Total:	67,306	37,105 55.13%	24,522 36.43%	3,666 5.45%
Voting Age	52,123	30,612 58.73%	17,511 33.60%	2,377 4.56%
District 013 Total				
Total:	765,135	253,135 33.08%	404,963 52.93%	71,377 9.33%
Voting Age	576,337	207,154 35.94%	294,669 51.13%	46,150 8.01%
District 014				
County: Catoosa GA				
Total:	67,872	59,280 87.34%	2,642 3.89%	2,341 3.45%
Voting Age	52,448	46,578 88.81%	1,684 3.21%	1,492 2.84%
County: Chattooga GA				
Total:	24,965	20,079 80.43%	2,865 11.48%	1,297 5.20%
Voting Age	19,416	15,885 81.81%	2,235 11.51%	733 3.78%
County: Cherokee GA				
Total:	144,220	111,210 77.11%	9,377 6.50%	16,749 11.61%
Voting Age	108,980	87,087 79.91%	6,363 5.84%	10,598 9.72%
County: Dade GA				
Total:	16,251	14,786 90.99%	228 1.40%	364 2.24%
Voting Age	12,987	11,925 91.82%	140 1.08%	243 1.87%

Plan Components with Population Detail

Nov14_GA_congress

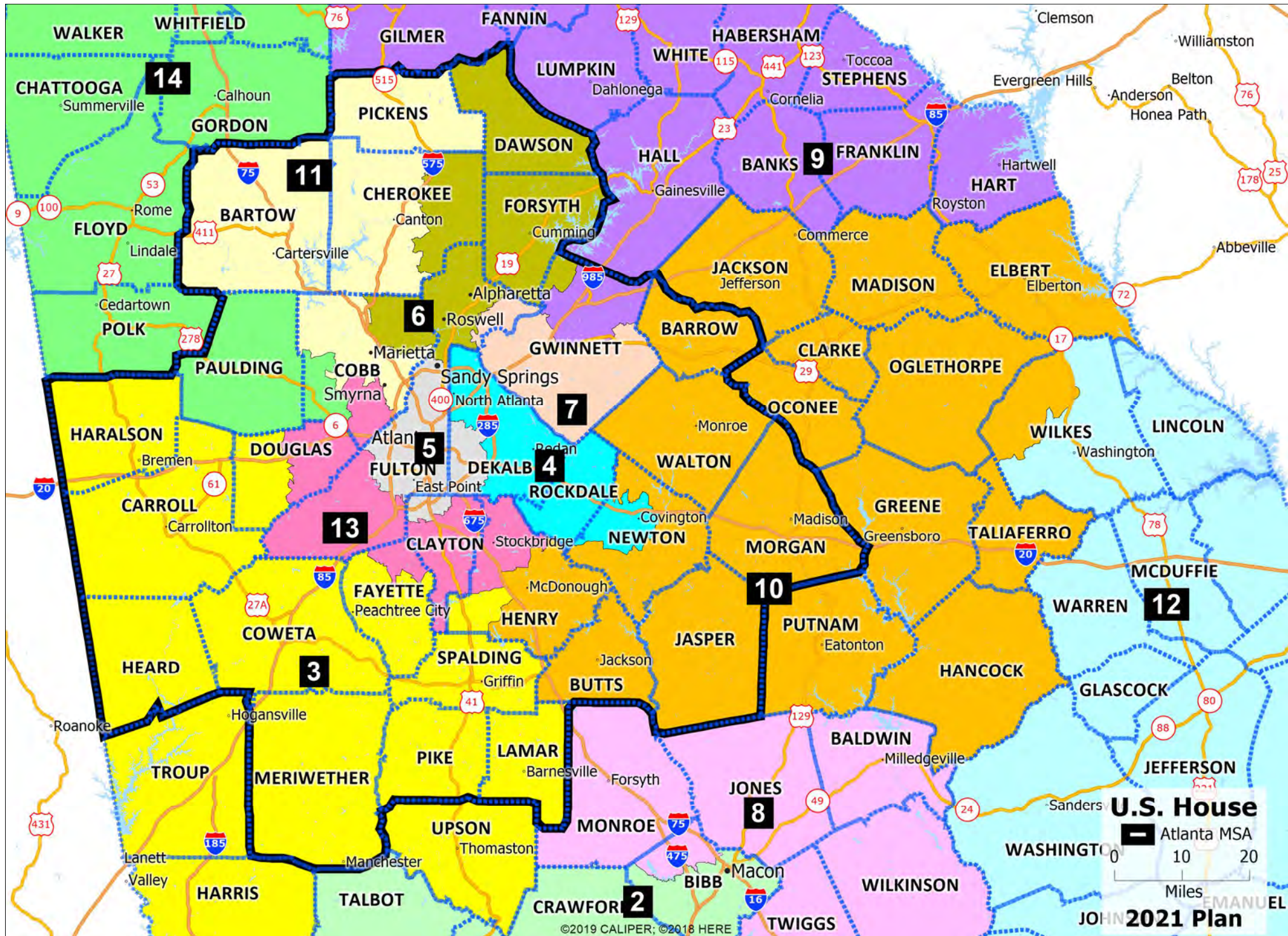
	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 014				
County: Dawson GA				
Total:	26,798	23,544 87.86%	392 1.46%	1,605 5.99%
Voting Age	21,441	19,183 89.47%	249 1.16%	1,047 4.88%
County: Fannin GA				
Total:	25,319	23,351 92.23%	199 0.79%	753 2.97%
Voting Age	21,188	19,721 93.08%	133 0.63%	505 2.38%
County: Floyd GA				
Total:	98,584	67,747 68.72%	15,606 15.83%	11,466 11.63%
Voting Age	76,295	55,088 72.20%	11,064 14.50%	7,167 9.39%
County: Gilmer GA				
Total:	31,353	26,365 84.09%	296 0.94%	3,599 11.48%
Voting Age	25,417	22,187 87.29%	161 0.63%	2,158 8.49%
County: Gordon GA				
Total:	57,544	43,317 75.28%	2,919 5.07%	8,957 15.57%
Voting Age	43,500	34,084 78.35%	1,939 4.46%	5,592 12.86%
County: Lumpkin GA				
Total:	3,890	3,523 90.57%	42 1.08%	136 3.50%
Voting Age	3,075	2,818 91.64%	25 0.81%	98 3.19%
County: Murray GA				
Total:	39,973	32,164 80.46%	556 1.39%	5,914 14.79%
Voting Age	30,210	25,146 83.24%	321 1.06%	3,696 12.23%
County: Pickens GA				
Total:	33,216	30,122 90.69%	512 1.54%	1,198 3.61%
Voting Age	26,799	24,626 91.89%	319 1.19%	755 2.82%
County: Union GA				
Total:	24,632	22,646 91.94%	228 0.93%	816 3.31%
Voting Age	20,808	19,351 93.00%	147 0.71%	563 2.71%

Plan Components with Population Detail

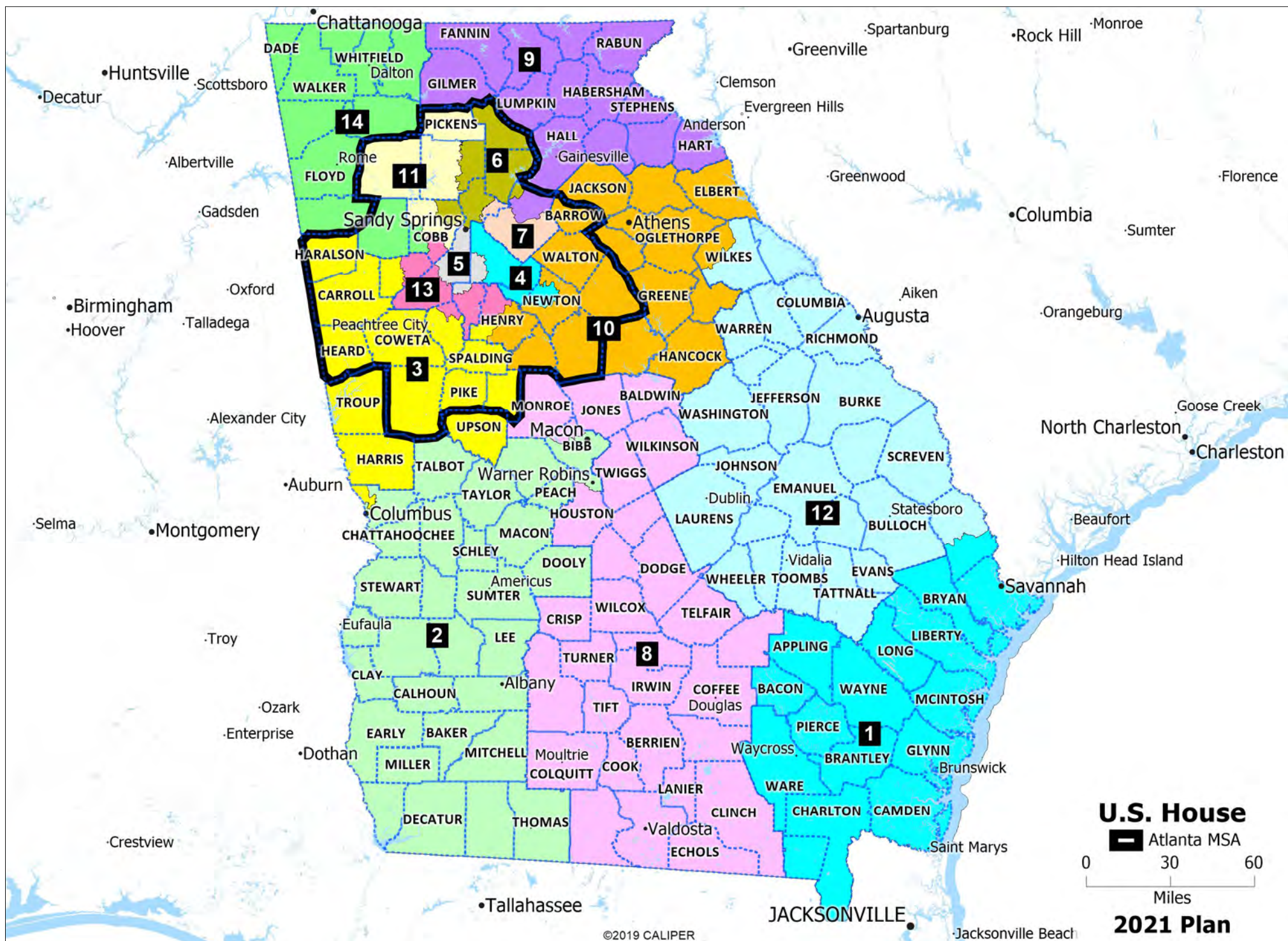
Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 014				
County: Walker GA				
Total:	67,654	59,654	3,664	1,685
		88.18%	5.42%	2.49%
Voting Age	52,794	47,292	2,454	1,066
		89.58%	4.65%	2.02%
County: Whitfield GA				
Total:	102,864	57,875	4,919	36,916
		56.26%	4.78%	35.89%
Voting Age	76,262	46,881	3,349	23,553
		61.47%	4.39%	30.88%
District 014 Total				
Total:	765,135	595,663	44,445	93,796
		77.85%	5.81%	12.26%
Voting Age	591,620	477,852	30,583	59,266
		80.77%	5.17%	10.02%

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT J-1



DECLARATION OF WILLIAM S. COOPER:
EXHIBIT J-2



DECLARATION OF WILLIAM S. COOPER:
EXHIBIT K-1

Population Summary Report

Georgia U.S. House -- 2020 Census -- Enacted Plan

District	Population	Deviation	% Deviation	AP Black	% AP Black	Latino	% Latino	NH White	% NH White
001	765137	1	0.00%	230783	30.16%	59328	7.75%	440636	57.59%
002	765137	1	0.00%	393195	51.39%	45499	5.95%	305611	39.94%
003	765136	0	0.00%	188947	24.69%	48285	6.31%	492494	64.37%
004	765135	-1	0.00%	423763	55.38%	88947	11.63%	197536	25.82%
005	765137	1	0.00%	392822	51.34%	56496	7.38%	273819	35.79%
006	765136	0	0.00%	78871	10.31%	78299	10.23%	487400	63.70%
007	765137	1	0.00%	239717	31.33%	181851	23.77%	225905	29.52%
008	765136	0	0.00%	241628	31.58%	54850	7.17%	443123	57.91%
009	765137	1	0.00%	87130	11.39%	117758	15.39%	495078	64.70%
010	765135	-1	0.00%	184137	24.07%	58645	7.66%	486487	63.58%
011	765137	1	0.00%	143404	18.74%	99794	13.04%	469264	61.33%
012	765136	0	0.00%	294961	38.55%	43065	5.63%	398843	52.13%
013	765137	1	0.00%	520094	67.97%	93554	12.23%	125106	16.35%
014	765135	-1	0.00%	118694	15.51%	97086	12.69%	520854	68.07%
Total	10711908		0.00%	3538146	33.03%	1123457	10.49%	5362156	50.06%

District	18+ Pop	18+ SR Black	% 18+ SR Black	18+ AP Black	% 18+ AP Black	18+ Latino	% 18+ Latino	18+ NH White	% 18+ NH White
001	589266	157770	26.77%	166025	28.17%	39938	6.78%	440636	57.59%
002	587555	281564	47.92%	289612	49.29%	30074	5.12%	305611	39.94%
003	586319	130099	22.19%	136708	23.32%	31274	5.33%	492494	64.37%
004	589470	308266	52.30%	321379	54.52%	59670	10.12%	197536	25.82%
005	621515	295885	47.61%	308271	49.60%	41432	6.67%	273819	35.79%
006	574797	50334	8.76%	56969	9.91%	52353	9.11%	487400	63.70%
007	566934	157650	27.81%	169071	29.82%	120604	21.27%	225905	29.52%
008	585857	170421	29.09%	175967	30.04%	35732	6.10%	443123	57.91%
009	592520	56416	9.52%	61747	10.42%	76361	12.89%	495078	64.70%
010	588874	126798	21.53%	133097	22.60%	38336	6.51%	486487	63.58%
011	595201	98212	16.50%	106811	17.95%	66802	11.22%	469264	61.33%
012	588119	207872	35.35%	215958	36.72%	28628	4.87%	398843	52.13%
013	574789	370024	64.38%	383663	66.75%	60467	10.52%	125106	16.35%
014	579058	77108	13.32%	82708	14.28%	61247	10.58%	520854	68.07%
Total	8220274	2488419	30.27%	2607986	31.73%	742918	9.04%	5362156	65.23%

District	% NH Single-Race Black CVAP*	% NH DOJ Black CVAP**	% Latino CVAP	% SR NH White CVAP
001	29.16%	29.67%	4.49%	63.10%
002	49.55%	50.001%	3.17%	44.62%
003	22.53%	22.86%	3.38%	71.12%
004	57.71%	58.46%	3.98%	32.82%
005	51.64%	52.35%	3.48%	39.75%
006	9.72%	10.26%	5.63%	76.60%
007	31.88%	32.44%	11.20%	43.69%
008	30.46%	30.76%	3.79%	63.40%
009	10.03%	10.34%	7.35%	77.37%
010	22.11%	22.56%	4.06%	70.80%
011	17.57%	18.30%	6.28%	71.12%
012	36.60%	37.19%	3.39%	56.94%
013	66.36%	67.05%	5.80%	23.21%
014	13.19%	13.71%	6.20%	78.21%

CVAP Source:

* 2016-20 ACS Special Tabulation <https://redistrictingdatahub.org/dataset/georgia-cvap-data-disaggregated-to-the-block-level-2020/>

Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates

* Single race NH Black CVAP, **NH DOJ Black= SR NH Black CVAP+SR NH Black/White CVAP

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT K-2

