

EXHIBIT G

Grant, Annie Lois, et al.v. Raffensperger, Brad, E

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

ANNIE LOIS GRANT, et al.,)
)
Plaintiffs,)
) CIVIL ACTION
vs.) FILE NO.:
) 1:22-CV-00122-SCJ
BRAD RAFFENSPERGER, in his)
)
official capacity as the)
Georgia Secretary of State,)
et al.,)
)
Defendants.)

COAKLEY PENDERGRASS, et al.)
)
Plaintiffs,)
) CIVIL ACTION
vs.) FILE NO.
) 1:21-CV-05339-SCJ
BRAD RAFFENSPERGER, et al.,)
)
Defendants.)

THE VIDEOTAPED DEPOSITION OF:

Loren Collingwood, Ph.D.

Tuesday, February 28th, 2023

10 a.m.

via Zoom videoconference

Amanda A. Bilbrey, CCR

1 of way that's typically done in court cases. I mean,
2 I know people look at certain things, but it's
3 pretty -- it's pretty tough to do in the context of,
4 say, NVRA cases, I would say.

5 Q So if you see a pattern of racially
6 polarized voting, based on your analysis of the data,
7 you don't believe there's a way to determine if that's
8 caused just by partisan political preference rather
9 than by race?

10 A Well, typically when I look at polarized
11 voting, specifically look to ask -- to look at the
12 bivariate relationship between racial identification
13 in a group and vote preference. And so party is not
14 usually considered as a matter.

15 Q Okay. And you weren't asked to look in
16 these two cases at the role of partisanship in voting
17 patterns, were you?

18 A No, I was not.

19 Q This webpage, Exhibit 9, also talks about
20 Collingwood Research's work with redistricting. It
21 says: We develop electoral districts designed to
22 ensure fair elections, equitable representation, and
23 electoral outcomes that comply with the standards
24 outlined by federal and state voting rights laws.

25 Is that an accurate description of what

1 tell the story. So I didn't really feel the need to
2 keep going.

3 Q Would you agree there are places in Georgia
4 where the black median household income is higher than
5 the white median household income?

6 A I'm trying to think on my analysis, looking
7 at some of the areas, I did see there's a few spots
8 where, say, quarter turnout was higher. There's
9 certainly going to be some -- probably some areas in
10 Georgia, in and around Atlanta, that probably has a
11 higher -- black folks there are doing better than,
12 say, white folks in other parts of the state. But I
13 was looking mainly at, you know, kind of overall
14 averages and things.

15 Q But do you know of any -- do you know of any
16 locality, you know, whether it's a county or a city or
17 a neighborhood where the measured black median income
18 is higher than the measured white median income in the
19 same locality?

20 A Yeah. I'm -- I would have to go and look at
21 the data more closely on that. It's probably the case
22 somewhere, but I just can't think off the top of my
23 head, you know, exactly where that would be.

24 Q Going to part C, page 7, effect on political
25 participation. You say in the first sentence of that

1 section: Socioeconomic disparities like these
2 unquestionably affect political participation.

3 Do you agree with that sentence?

4 A Yes.

5 Q And is that true -- is that sentence true
6 for voters regardless of their race?

7 A It is.

8 Q Tell me -- at the end of that paragraph, you
9 have a reference to a hookworm eradication program.
10 Why is that relevant?

11 A Well, No. 1, I don't get a lot of chances to
12 write about hookworms. No. 2, it's a very interesting
13 study, because it -- it uses this program from, like,
14 the '30s that applied a randomization process to the
15 counties that got an eradication program. And then
16 the idea is those counties then -- the health of the
17 people there were better, and that later on they had
18 people, like, many decades later had higher levels of
19 education and also higher levels of political
20 participation in voter turnout. And so it's a unique
21 way to get at something that just is done in a kind of
22 unique fashion that we don't normally see.

23 Q How did you come across this, if you came
24 across this Henderson paper or book where Henderson
25 talks about it?

1 Q And you've got Sub-A statewide analysis, and
2 you found that generally in the years that you've
3 looked at white turnout was higher than black turnout,
4 with the exception for the 2012 being the narrowest
5 gap of the years you've looked at there, right, in
6 Table 3?

7 A Yeah. That's correct.

8 Q And 2012 was the year President Obama ran
9 for reelection; correct?

10 A Correct.

11 Q Is it your opinion that higher motivation of
12 black voters in that particular election may have
13 affected the turnout gap?

14 A That is a pretty plausible hypothesis.

15 Q So motivation -- voter motivation is a
16 factor that goes into turnout of voters for both black
17 and white voters; correct?

18 A Certainly individual level or group-based
19 motivation, you know, can, you know, effect turnout.
20 Yeah.

21 Q So based on 2012, would you agree that black
22 voters are able to turn out in nearly the same
23 percentages as white voters if they choose to do so in
24 Georgia?

25 A There is certainly that possibility, yes.

1 me what you were doing there. You talk about 2014 to
2 2018 elections.

3 A So this is effectively the same thing that
4 we did above. It just then walks through each -- the
5 same set of results, but for each election.

6 Q Right. Okay. So 5, 6, and 7, you're
7 saying --

8 A So I guess the same general -- yeah.

9 Q Right. So 5 is 2018 --

10 A Yeah.

11 Q I apologize. I'm talking over you.

12 A No worries.

13 Q And Figure 6 is 2016 and Figure 7 is 2014;
14 correct?

15 A Correct.

16 Q Let's go back to Figure 5. Are you aware in
17 2018 Stacey Abrams, who is African-American, was
18 running for governor as a Democrat?

19 A Yes.

20 Q Okay. Did you consider whether that may
21 have affected black voter motivation and therefore
22 black voter turnout in 2018?

23 A I mean, I, you know, as a -- I didn't
24 particularly write about specific types of candidates
25 in different elections. But, you know, I'm very --

1 I'm pretty familiar with that. You know, as someone
2 who doesn't live in Georgia and read the news in
3 Georgia, I'm pretty familiar with -- that election got
4 a lot of attention, like, through the New York Times,
5 Washington Post, kind of nationally. So I'm familiar
6 with that -- that election. So it makes sense that
7 that's why you see that. Yeah.

8 Q Because if you -- I mean, if you look in
9 Figure 5 and you see -- I'm counting at least five
10 counties above the blue line. It looks like maybe six
11 or seven are right on the blue line in Figure 5.

12 Would you agree with that?

13 A Yeah. It's -- that -- it's hard to say
14 exactly. But it's definitely, you know, a little
15 different than the -- than the other ones.

16 Q Yeah.

17 A Yeah.

18 Q But then if we go back up to Figures 1 and
19 2, the white/black differential based on registrants,
20 there aren't as many dots above the blue line in
21 Figures 1 and 2 for the 2022 and 2020 elections as in
22 2018; right?

23 A Yeah. I mean, without doing a, you know,
24 detailed kind of -- you know, had to spreadsheet them
25 all out and count them all up, but that certainly

1 high school education or college education; correct?

2 A Yeah. Yeah.

3 Q And by showing that for black voters, for
4 example, on Figure 22, as the higher percentage -- as
5 the percentage of black voters with less than a high
6 school education goes up, turnout goes down, you don't
7 know whether that's also true for white voters?

8 A I don't.

9 Q On a footnote on 24, on Footnote 7, you said
10 you excluded counties with a thousand registered black
11 voters or fewer.

12 Why did you use that cutoff?

13 A It's -- it's just kind of an even thousand.
14 There's not very many counties that fit that bill,
15 and, you know, it's just -- that's not a lot of people
16 for a county to have that few of registered black
17 voters. So, you know, in social science we have to
18 kind of set cutoffs. I try to set those cutoffs not
19 at all based on correlations with how the results
20 might change as an a priori design. I tend to try to
21 choose sensible numbers based on experiences with
22 these types of data. Sometimes I used 10, 25, 50,
23 100. In this case, 1,000 made sense.

24 Q What is the -- the gray shading on Figure 22
25 around the blue line? What's that showing?

1 race in Georgia is a barrier to voting?

2 A Well, yeah. I would say that just based on
3 the data that I look at, all else equal, if you're
4 black versus white -- this is a very important, all
5 else equal -- your probability of turning out to vote
6 is going to be lower.

7 Q But as far as external factors preventing a
8 black voter from exercising the right to vote, you're
9 not commenting on any such external factors, are you?
10 Preventing somebody from voting in a particular cycle?

11 A I guess could you give me an example of an
12 external factor?

13 Q Well, I mean, like, you know, there used to
14 be a law that -- there used to be a white primary, and
15 if you weren't white you couldn't vote in it. I mean,
16 you know, do you know of anything like that preventing
17 a black voter today from voting?

18 A I don't know of any specific race-specific
19 laws like what Georgia and many other southern states
20 had previously, if that's what you mean. Yeah. I'm
21 not commenting on that.

22 Q Are you -- have you concluded that racism in
23 Georgia causes the lower levels of voting
24 participation by black voters in Georgia compared to
25 white voters in Georgia?

1 A I don't have a specific measure of racism
2 that's associated with voter turnout here. A social
3 scientist would likely look at all of this and
4 potentially say the reasons we're seeing this is -- is
5 because of that. But those variables don't measure
6 that specifically. So it would have to be taken under
7 a more holistic analysis, which some people would make
8 that case. I'm a little bit -- in this case, I just
9 want to focus on the actual variables that I'm looking
10 at.

11 Q You're really -- you're just -- you're just
12 analyzing the data?

13 A That's right.

14 Q You've used -- you've used the term "social
15 scientist" a couple times in the last few minutes.
16 Are you a social scientist?

17 A Yeah.

18 Q Do you have a degree in social science?

19 A Well, political science is a social science
20 field, so, yes.

21 Q Do you have an opinion that Georgia's recent
22 redistricting maps or prior redistricting maps, say
23 since 2010, have caused the lower levels of black
24 participation that you've found in your data analysis?

25 A I can't speak to those directly. I haven't

1 looked at them directly for this report.

2 Q Turning to page 44 you have a Section 3,
3 other forms of voter participation. And as you say
4 there at the first sentence: The next section
5 examines disparities between blacks and whites among
6 other modes of voter participation.

7 And it says you used the 2020 Cooperative
8 Election Study. Explain what that is in detail.

9 A So the data set that I briefly discussed
10 earlier, it's a survey of voters or eligible voters, I
11 believe, usually around four -- 30- to 60,000
12 respondents across the United States at least 18-plus
13 age. And it asks a bunch of questions. It's
14 conducted by a couple of folks, I think, out of
15 Harvard and a couple other places. A lot of political
16 scientists contribute modules and questions to it.

17 So it's one of the top two or three data
18 sources for people who do political behavior research
19 and political science in American politics, and it's
20 widely used, widely published off of. And so I was
21 able to download that. That's what's known as a
22 common content form, which is free. So you can
23 download that and then subset just to the state here
24 of Georgia. It still yields a pretty sizable sample
25 size.

1 Q On Table 10, campaign contacts, you'd agree
2 the responses there for whites and blacks are pretty
3 similar, aren't they?

4 A They're statistically indistinguishable.

5 Q Table 11 is also pretty close, isn't it?

6 A Also statistically indistinguishable.

7 Q And it's your opinion that the differences
8 that you see in these Tables 4 to 11 are due to
9 socioeconomic differences between black and white
10 voters?

11 A Well, this analysis, that's certainly one of
12 the -- one of the differences, but it could also be
13 long-running discrimination in Georgia. I -- this
14 analysis doesn't allow me to say specifically why
15 these differences are. I can just see that there are
16 differences.

17 Q You then come to a conclusion on page 38 of
18 your report. You say: These findings provide strong
19 evidence for presence of Senate Factor 5 in the state
20 of Georgia.

21 Could you elaborate on that at all?

22 A Well, just, I mean, across pretty much every
23 seen analysis there's a difference between white and
24 black political participation, which is related to
25 socioeconomic barriers, which reduces black voter