

IN THE UNITED  
FOR THE WESTERN  
MON

PHILLIP CALLAIS, *et al.*,

*Plaintiffs,*

v.

NANCY LANDRY, in her official capacity  
as Secretary of State for Louisiana,

*Defendant.*

REBUTTA  
Cory  
M

Table 1: Summary of issues with the seven simulation analyses in Dr. Voss’s report.

| Simulation analysis     | Uses<br>J.R. 21<br>Criteria? | Applies<br>criteria like<br>Legislature? | Stated<br>constraints<br>applied<br>correctly? | Simulations<br>representative<br>and reliable? | Usable for<br>studying<br>Black-majority<br>districts? |
|-------------------------|------------------------------|--|--|--|--|
| <b>“Race-neutral”</b>   |                              |  |  |  |  |
| Baseline                | No                           | No                                       | No   | ?  | No   |
| Light Parish Protection | No                           | No                                       | No   | No   | No   |
| Heavy Parish Protection | No                           | No                                       |  | No   | No   |
| Multi-Split Avoidance   | No                           | No                                       |  | No   | No   |
| <b>“Race-conscious”</b> |                              |  |  |  |  |
| Parish BVAP Clusters    | No                           | No                                       |  | ?  | No   |
| Statewide BVAP Clusters | No                           | No                                       | No   | ?  | No   |
| via District 2          | No                           | No                                       | No   | No   | No   |

R003-001

(R003) McCartan Rebuttal Expert Report at p.6 (Table 1)