# STATE OF MICHIGAN
# IN THE SUPREME COURT

DETROIT CAUCUS; ROMULUS CITY COUN-
CIL; INKSTER CITY COUNCIL; TENISHA
YANCY, as a State Representative and individually;
SHERRY GAY-DAGNOGO, as a Former State
Representative and individually; TYRONE
CARTER, as a State Representative and individually;
BETTY JEAN ALEXANDER, as a State Senator
and individually, Hon. STEPHEN CHISHOLM, as
member of Inkster City Council and individually,
TEOLA P. HUNTER, as a Former State Representa-
tive and individually; Hon. KEITH WILLIAMS, as
Chair MDP Black Caucus and individually; DR.
CAROL WEAVER, as 14th Congressional District
Executive Board Member and individually; WEN-
DELL BYRD, as a Former State Representative and
individually; SHANELLE JACKSON, as a Former
State Representative and individually; LAMAR
LEMMONS, as a Former State Representative and
individually; IRMA CLARK COLEMAN, as a For-
mer Senator &Wayne County Commissioner and in-
dividually; LAVONIA PERRYMAN, as representa-
tive of the Shirley Chisholm Metro Congress of Black
Women and individually; ALISHA BELL, as Wayne
County Commissioner and individually; NATALIE
BIENAIME; OLIVER COLE; ANDREA THOMP-
SON; DARRYL WOODS; NORMA D. MCDAN-
IEL, MELISSA D. MCDANIEL; CHITARA WAR-
REN; JAMES RICHARDSON; and ELENA HER-
RADA,

MSC No. 163926

Original Jurisdiction
Const 1963, art. 4, § 6(19).

     Plaintiffs,

v.

INDEPENDENT CITIZENS REDISTRICT-
ING COMMISSION,

     Defendant.

---

## DEFENDANT INDEPENDENT CITIZENS REDISTRICTING COMMISSION'S BRIEF IN SUPPORT OF ITS ANSWER TO PLAINTIFFS' FIRST AMENDED VERIFIED COMPLAINT

AYAD LAW, PLLC
Nabih H. Ayad (P59518)
William D. Savage (P82146)
645 Griswold St., Ste 2202
Detroit, MI 48226
(313) 983-4600
nabihayad@ayadlawpllc.com
williamsavage@ayadlawpllc.com
*Counsel for Plaintiffs*

YANCEY LAW, PLLC
Tenisha Yancey (P78319)
18640 Mack Ave, Unit 36522
Grosse Pointe, MI 48236
(313) 915-0289
tenisha.yancey@gmail.com
*Counsel for Plaintiffs*

INDEPENDENT CITIZENS REDISTRICT-
ING COMMISSION
Julianne V. Pastula (P74739)
P.O. Box 511183
Livonia, Michigan 48151
(517) 331-6318
pastulaj1@michigan.gov
*General Counsel to the Commission*

FINK BRESSACK
David H. Fink (P28235)
Nathan J. Fink (P75185)
Philip D.W. Miller (P85277)
38500 Woodward Ave., Suite 350
Bloomfield Hills, Michigan 48304
(248) 971-2500
dfink@finkbressack.com
nfink@finkbressack.com
pmiller@finkbressack.com
*Counsel for Defendant*

BAKER & HOSTETLER LLP
Katherine L. McKnight (*PHV Motion filed*)
Richard B. Raile (*PHV Motion to be filed*)
1050 Connecticut Ave., NW, Suite 1100
Washington, D.C. 20036
(202) 861-1500
kmcknight@bakerlaw.com
rraile@bakerlaw.com

Patrick T. Lewis (*PHV Motion filed*)
127 Public Square, Suite 2000
Cleveland, Ohio 44114
(216) 621-0200
plewis@bakerlaw.com
*Counsel for Defendant*

# TABLE OF CONTENTS

# TABLE OF AUTHORITIES

## CONSTITUTIONAL PROVISIONS

## JURISDICTIONAL SUMMARY

The Defendant, the Independent Citizens Redistricting Commission, agrees with Plaintiffs' jurisdictional summary.

## STATEMENT OF QUESTION INVOLVED

Do Michigan's 2021 congressional and state legislative plans afford Black voters in and around Detroit an equal "opportunity . . . to participate in the political process and to elect representatives of their choice," as Section 2 of the Voting Rights Act requires, 52 USC 10301(b)?

The Commission answers: Yes.

## **INTRODUCTION**

On December 28, 2021, the Independent Citizens Redistricting Commission (the "Commission") enacted new redistricting plans to govern legislative and congressional elections in Michigan. This concluded an effort that began in September 2020 with commissioners' orientation, involved some 139 public meetings and hearings, saw tens of thousands of public comments, and culminated with broad agreement on the Commission for the enacted plans—as Democratic, Republican, and independent commissioners supported each one.

As part of its constitutional mandate, the Commission worked to ensure that members of the Black community, like every community, have the same "opportunity [as] other members of the electorate to participate in the political process and to elect representatives of their choice," as Voting Rights Act (VRA) § 2 requires. 52 USC 10301(b). The Commission hired a former U.S. Department of Justice Voting Rights Section attorney, Bruce Adelson, and a nationally recognized VRA expert who has also served the Voting Rights Section, Dr. Lisa Handley. These professionals examined more than 100 probative elections, including Democratic primaries, to determine what level of Black voting-age population (BVAP) is needed in electoral districts to ensure equal minority opportunity. The Commission prepared and enacted its plans on the basis of this thorough evidentiary record and the advice of these seasoned professionals.

Plaintiffs contend that the VRA (and, therefore, Const 1963, art 4, § 13(a)) requires "two to four majority-Black districts in each of the three Plans" in the Detroit metropolitan region and challenge the enacted plans for purportedly failing to meet these targets (even though the house plan has *five* majority-Black districts in and around Detroit). Br. 12. While Plaintiffs' concerns are understandable, they incorrectly rely on "mechanical racial targets" with no basis in evidence. *Ala Legislative Black Caucus v Alabama*, 575 US 254, 267; 135 S Ct

1257; 191 L Ed 2d 314 (2015). Plaintiffs present no alternative redistricting plan showing superior district configurations, proffer no polarized voting study establishing the voting preferences of different racial groups, and erroneously rely on comparisons to prior redistricting plans—the focus of inoperative VRA § 5—to establish a violation of VRA § 2.

The Commission, by contrast, *did* have evidence and it undermines Plaintiffs' claim. The critical VRA question is the degree to which voting is racially polarized. The Commission determined, based on a thorough polarized voting study, that white voters consistently "cross over" to vote for Black-preferred candidates in and around Detroit. Dr. Handley determined that districts of 35% BVAP or more are likely to afford members of the Black community an equal electoral opportunity, given white crossover voting levels. Those levels are substantial: Dr. Handley's analysis shows that, in about 91% of congressional and state legislative elections analyzed, either the election was not racially polarized or else the Black-preferred candidate *prevailed*. As such, creating districts at 50% or greater BVAP is not only unnecessary to protect Black equal opportunity, but also harmful and potentially dilutive.

Plaintiffs' demand for districts drawn to achieve racial targets arbitrarily selected without accounting for evidence of white crossover voting contravenes controlling U.S. Supreme Court decisions on the VRA and Equal Protection Clause. See, e.g., *Cooper v Harris*, 137 S Ct 1455, 1470; 197 L Ed 2d 837 (2017) (striking down majority-Black congressional district given evidence of strong white crossover voting). And a three-judge federal court panel recently rejected a similar challenge to Illinois's legislative district plan based on a claim that Illinois's plan did not contain a sufficient number of majority-Latino or majority-Black districts in certain regions. *McConchie v Scholz*, --F Supp 3d--, 2021 WL 6197318 (ND Ill, Dec 30, 2021). In *McConchie*, the "record show[ed] ample evidence of crossover voting to defeat any claim of racially polarized voting sufficient to deny Latino and Black voters of the opportunity to elect candidates of their choice." *Id.* at 30. So too here.

3

Section 2 "allows States to choose their own method of complying with the Voting Rights Act," and this "may include drawing crossover districts." *Bartlett v Strickland*, 556 US 1, 23; 129 S Ct 1231; 173 L Ed 2d 173 (2009). That is what the Commission did here, and its choice was sound. *Id.* at 24 ("States can—and in proper cases should—defend against § 2 violations by pointing to crossover voting patterns and to effective crossover districts"). Plaintiffs' challenge mirrors the recent VRA errors of many redistricting authorities, who created majority-minority districts not required by the VRA and not supported by evidence and saw those districts invalidated as violations of the federal Equal Protection Clause. The Commission, by contrast, navigated these "competing hazards of liability," *Bush v Vera*, 517 US 952, 977; 116 S Ct 1941; 135 L Ed 2d 248 (1996) (plurality opinion), using a data-driven approach and tailoring VRA compliance goals to the best available estimates of voting patterns, rather than arbitrarily picking a BVAP target. That is the right way to comply with the VRA, and this Court should not undo the Commission's choices.

## STATEMENT OF FACTS

### I.  The VRA and Equal Protection Clause Framework

After each decennial census, "[s]tates must redistrict to account for any changes or shifts in population." *Georgia v Ashcroft*, 539 US 461, 489 n 2; 123 S Ct 2498; 156 L Ed 2d 428 (2003). "Redistricting is never easy." *Abbott v Perez*, 138 S Ct 2305, 2314; 201 L Ed 2d 714 (2018). This is, in part, because "federal law impose[s] complex and delicately balanced requirements regarding the consideration of race." *Id.*

On the one hand, "federal law restrict[s] the use of race in making districting decisions." *Id.* Specifically, "[t]he Equal Protection Clause forbids 'racial gerrymandering,' that is, intentionally assigning citizens to a district on the basis of race without sufficient justification." *Id.* (citing *Shaw v Reno*, 509 US 630, 641; 113 S Ct 2816; 125 L Ed 2d 511 (1993) (*Shaw*

4

*I*)). Under this doctrine, creating a majority-minority district, designed to ensure that BVAP exceeds 50% or more (or a different target), will likely subject the district to strict scrutiny. See *Cooper*, 137 S Ct at 1468–69 (applying strict scrutiny to, and invalidating, a North Carolina congressional district where legislators "repeatedly told their colleagues . . . [districts] had to be majority-minority, so as to comply with the VRA.").

On the other hand, "[a]t the same time that the Equal Protection Clause restricts the consideration of race in the districting process, compliance with the Voting Rights Act of 1965, pulls in the opposite direction: It often insists that districts be created precisely because of race." *Abbott*, 138 S Ct at 2314 (citation omitted). "A State violates § 2 if its districting plan provides 'less opportunity' for racial minorities 'to elect representatives of their choice.'" *Id.* (quoting *League of United Latin American Citizens v Perry*, 548 US 399, 425; 126 S Ct 2594; 165 L Ed 2d 609 (2006) (*LULAC*)). "In a series of cases tracing back to *Thornburg v Gingles*, 478 US 30; 106 S Ct 2752; 92 L Ed 2d 25 (1986), [the U.S. Supreme Court has] interpreted this standard to mean that, under certain circumstance, States must draw 'opportunity' districts in which minority groups form 'effective majorit[ies].'" *Id.* (citation omitted).

But there are limits to this obligation. "[C]ourts may not order the creation of majority-minority districts unless necessary to remedy a violation of federal law." *Voinovich v Quilter*, 507 U.S. 146, 156; 113 S Ct 1149; 122 L Ed 2d 500 (1993). First, § 2 requires majority-minority districts only if "three threshold" elements are proven. *Cooper*, 137 S Ct at 1470. Those elements, known as the *Gingles* preconditions, are that: (1) the relevant minority group is "'sufficiently large and geographically compact to constitute a majority' in some reasonably configured legislative district"; (2) the relevant minority group is "politically cohesive," and (3) the "district's white majority . . . 'vote[s] sufficiently as a bloc' to usually 'defeat the minority's preferred candidate.'" *Id.* (quoting *Gingles*, 478 US at 50–51). Second, states must not

5

maximize the number of majority-minority districts in a plan. *Johnson v De Grandy*, 512 US 997, 1017; 114 S Ct 2647; 129 L Ed 2d 775 (1994) ("Failure to maximize cannot be the measure of § 2."). Third, in *Bartlett v Strickland*, 556 US at 1, the Supreme Court held that the first *Gingles* precondition is not satisfied, and § 2 is not implicated, "when the minority group makes up less than 50 percent of the voting-age population in the potential election district." *Id.* at 12. Thus, § 2 does not mandate that states create so-called "crossover" districts, in which "minority voters make up less than a majority of the voting-age population," but that community is "large enough to elect the candidate of its choice with help from voters who are members of the majority and who cross over to support the minority's preferred candidate." *Id.* at 13. Nevertheless, crossover districts may be created "as a matter of legislative choice or discretion." *Id.* at 23. Further, "[s]tates can—and in proper cases should—defend against alleged § 2 violations by pointing to crossover voting patterns and to effective crossover districts." *Id.* at 24.

"Since the Equal Protection Clause restricts consideration of race and the VRA demands consideration of race, a legislature attempting to produce a lawful districting plan is vulnerable to 'competing hazards of liability.'" *Abbott*, 138 S Ct at 2315 (quoting *Bush*, 517 US at 977). The Supreme Court has attempted to ameliorate those competing hazards by "assum[ing] that compliance with the VRA may justify the consideration of race in a way that would not otherwise be allowed"—i.e., that "complying with the VRA is a compelling state interest." *Id.* (citing *Bethune-Hill v Va State Bd of Elections*, 137 S Ct 788, 800–01; 197 L Ed 2d 85 (2017)). However, the state's burden in invoking this justification is demanding. See *Miller v Johnson*, 515 US 900, 915; 115 S Ct 2475, 2487–88; 132 L Ed 2d 762 (1995) (rejecting the view "that a State's assignment of voters on the basis of race would be subject to anything but our strictest scrutiny"). For a state to justify a purposefully created majority-minority district

under VRA § 2, it must adduce evidence—at the time of redistricting—establishing the three *Gingles* preconditions. *Id.* "If a State has good reason to think that all the 'Gingles' preconditions' are met, then so too it has good reason to believe that § 2 requires drawing a majority-minority district. But if not, then not." *Id.* (citation omitted).

## II. Background and Framework Governing the Commission

A. Redistricting in Michigan has, historically, fallen short of the ideal. At the congressional level, the Legislature was unable to pass redistricting plans following the 1970, 1980, and 1990 censuses, requiring this Court to intervene and fashion plans. *LeRoux v Secretary of State*, 465 Mich 594, 598; 640 NW2d 849, 852 (2002). Likewise, this Court was called upon to draw state legislative plans in 1982 and 1992, after the political branches failed to do so. See, e.g., *In re Apportionment of the State Legislature-1992*, 439 Mich 251; 483 NW2d 52 (1992); *In re Apportionment of the Michigan Legislature-1982*, 413 Mich 143; 323 NW2d 269 (1982).

The 2010 redistricting cycle proved controversial. Shortly after the 2011 redistricting, a coalition of minority groups sued, alleging the state house districts in Detroit violated the VRA and the Equal Protection Clause by, among other things, splitting the Hispanic community into two districts and excessively pairing minority incumbents. This claim was dismissed. *NAACP v Snyder*, 879 F Supp 2d 662, 679–80 (ED Mich, 2012) (three-judge panel).

The 2011 plans were challenged again in December 2017, when plaintiffs alleged that they were partisan gerrymanders in violation of Democratic voters' constitutional rights. A three-judge panel enjoined the plans under this theory. *League of Women Voters of Mich v Benson*, 373 F Supp 3d 867, 953–54 (ED Mich, 2019). That court found, among other things, that districts near Detroit "packed" Democratic voters, "making the surrounding districts . . . more Republican." *Id.* at 918, 920, 922. That injunction was vacated in light of *Rucho*

*v Common Cause*, 139 S Ct 2484; 204 L Ed 2d 931 (2019), which held that partisan-gerrymandering claims are nonjusticiable in federal court. See *Chatfield v League of Women Voters of Mich*, 140 S Ct 429; 205 L Ed 2d 250 (2019). But the criticisms aired in *Benson* were well publicized.

B.    Michigan's voters had enough. On November 6, 2018, they voted overwhelmingly to overhaul Michigan's redistricting process. The organization that led the initiative framed it as a vehicle to eject politicians from map-drawing, arguing that "[p]oliticians . . . manipulate our voting maps to keep themselves in power," which "allows politicians the power to choose their voters, instead of giving the voters the power to choose their politicians." Def. App. 001a. The resulting constitutional amendment created a comprehensive scheme to govern the Commission's work, with substantive and procedural dictates.

Substantively, the Commission is required to draw plans that comply with several exacting criteria, including that districts "be of equal population" and "comply with the voting rights act and other federal laws," "be geographically contiguous," "reflect the state's diverse population and communities of interest," "not provide a disproportionate advantage to any political party" as determined by "accepted measures of partisan fairness," "not favor or disfavor an incumbent elected official or a candidate," "reflect consideration of county, city, and township boundaries," and "be reasonably compact." Const 1963, art 4, § 6(13). The Commission is required to prioritize those criteria in the order stated. *Id.*

Procedurally, the Commission is structured beginning with a Commissioner-selection process designed to ensure partisan balance and exclude "an array of individuals with partisan ties" existing in "the past six years." *Daunt v Benson*, 999 F3d 299, 311 (CA 6, 2021); Const 1963, art 4, § 6(1). The Constitution also regulates the Commission's work, requiring it "to conduct all of its business at open meetings." Const. 1963, art 4, § 6(10); *Detroit News, Inc v Indep Citizens Redistricting Comm*, --NW2d--; 2021 WL 6058031, at *7 (Mich Dec 20, 2021).

Before drafting plans, the Commission was required to "hold at least ten public hearings throughout the state for the purpose of," among other things, "soliciting information from the public about potential plans." Const 1963, art. 4, § 6(8). Then, after commissioners drafted plans, which had to be published along with any "data and supporting materials," the Commission was required to hold "at least five public hearings throughout the state for the purpose of soliciting comment from the public about the proposed plans." *Id.* at § 6(9). Following that input, the Commission must select plans to be voted upon, triggering a mandatory 45-day public-comment period for each selected plan. *Id.* at § 14(b).

## III.  The 2021 Redistricting

The 2021 redistricting was uniquely challenging. The Commission found itself in "the difficult and unenviable position of undertaking its inaugural redistricting cycle without the full benefit of tabulated decennial census data," because the U.S. Census Bureau released the necessary redistricting data "six months late." *In re Indep Citizens Redistricting Comm for State Legislative & Congressional Dist's Duty to Redraw Districts by Nov 1, 2021*, 961 NW2d 211, 212 (Mich 2021) (WELCH, J., concurring). This delay made it impossible for the Commission to achieve its constitutional deadline to enact plans by November 1. Const 1963, art 4, § 6(7). Further, following the 2020 census, because Michigan's population growth lagged behind that of other states, Michigan was apportioned just 13 congressional seats, down from 14 in 2011. Another complexity arose from the fact that Detroit lost overall population and Black population.

Despite these challenges, the Commission "act[ed] diligently pursuant to its constitutional mandate." *In re Indep Citizens Redistricting Comm*, 961 NW2d at 212 (WELCH, J., concurring). The Commission met or surpassed every metric of public observation and participa-

tion. From September 17, 2020, through May 6, 2021, before mapdrawing began, the Commission held 35 public meetings to address preliminary matters like hiring staff, procurement activities, and adoption of procedures. While Subsection 8 required the Commission to hold ten public hearings before drafting, the Commission held sixteen. See Def. App. 118a–169a. After the release of redistricting data from the U.S. Census Bureau on August 12, 2021, the Commission, in a public process, created draft proposed maps. At this stage, the Commission held 38 more public meetings throughout the state. *Id.*

Next, after the Commission had drafted at least one set of plans, it held a second round of public hearings as required by Subsection 9. Collectively, the Commission has held 139 formal meetings and hearings as of this filing. *Id.* At each of the first two rounds of hearings, the Commission heard more than 1,000 live citizen comments. More than 10,000 public comments regarding proposed maps have been submitted to the Commission's "MyDistricting" website, and thousands more have been made on an online comment portal. The Commission has received thousands of additional written public comments. Comments continue to pour in.

The Commission finally held an additional four meetings before adopting, at its December 28, 2021, meeting, new redistricting plans. As the Constitution requires, each plan was adopted by the vote of at least two Commissioners affiliated with the two major parties and two Commissioners affiliated with no party. Const 1963, art. 4, § 6(14)(c). Unable to meet the November 1 deadline, the Commission committed itself to a December 31 deadline and achieved that goal.

## IV.    The Commission Protected Black Electoral Opportunity in Wayne County

A.    To ensure its plans would "comply with the voting rights act and other federal laws," Const 1963, art 4, § 6(13)(a), the Commission engaged VRA experts to collect and

analyze data and provide advice. After competitive-bidding processes, the Commission hired a nationally recognized expert, Dr. Lisa Handley, to conduct a racial bloc voting analysis, Def. App. 003a, and a nationally recognized voting-rights attorney, Bruce Adelson, to serve as VRA counsel. Def. App. 004a. Mr. Adelson, a former lawyer at the U.S. Department of Justice Voting Rights Section, was hired to "provide the advice, counsel and analysis, work closely with [the Commission], staff, the mapping consultant, [and the Commission's] general counsel in producing [a] districting plan that is compliant." Def. App. 005a. Throughout the process, the Commission turned to these experts. Mr. Adelson or Dr. Handley (or both) spoke at 36 Commission meetings between April and December 2021.[1] Dr. Handley provided written reports to the Commission on September 2, 2021, November 1, 2021, December 28, 2021, and January 4, 2022. All are (and have always been) public.

B.      On September 2, 2021, before Commissioners prepared final proposed maps, Dr. Handley presented initial findings. She conducted a thorough analysis of voting patterns statewide and specifically within Wayne, Oakland, Genesee, and Saginaw Counties, which she identified as the counties containing sufficiently large minority populations to merit analysis. Def. App. 021a.

Dr. Handley analyzed all federal and statewide general election contests from 2012 through 2020, including the only statewide Democratic primary in the last decade (the 2018 gubernatorial race). *Id.* at 022a. Dr. Handley also analyzed legislative races in relevant regions. *Id.* at 033a–034a. Dr. Handley used industry-leading ecological inference and ecological regression techniques to estimate levels of white and minority voter support for Black-preferred candidates. *Id.* at 020a. And while Dr. Handley identified racially polarized voting

---

[1] The specific dates included April 8, June 28 and 30, July 8 and 9, August 6 and 19, September 1, 2, 9, 14, 20, 21, 22, 23, 27, 28, 29, and 30, October 1, 2, 4, 5, 6, 7, 8, 11, 27, 28, 29, November 1, 3, 4, 5, and December 2 and 28, 2021. See Def. App. 118a–169a.

in Michigan (meaning that, as applicable here, white and Black voters tend to prefer different candidates), she identified significant white crossover voting (33.5% to 50.6% at the statewide level) in each of the four counties she studied. *Id.* at 028a–032a. That crossover voting affords Black voters an equal opportunity to elect representatives of their choice even in the absence of 50%+ majority-minority districts. Dr. Handley observed that, in state senate races, districts over 35% BVAP saw the election of Black candidates 67% of the time, and, in state house races, every contest in a district over 36% BVAP saw Black candidate success, and Black candidates were nearly always successful (89% of the time) in districts over 25% BVAP. See Def. App. 014a. Dr. Handley concluded that "statewide it's quite possible that you do not need a majority-minority District to elect a minority preferred candidate." *Id.* at 013a. In its October 27, 2021, session, the Commission received advice from Mr. Adelson that "the Voting Rights Act . . . does not require any numerical amount of majority-minority districts, indeed, does not even require majority-minority districts at all."[2]

C.    On November 1, ahead of the Commission's final proposed maps deadline that would trigger the final 45-day comment period, Dr. Handley presented again on racially polarized voting. Dr. Handley focused her analysis on other minority populations like the Arab-American, Hispanic, and Bengali communities. Based on Dr. Handley's findings of cohesion among these minority communities, Mr. Adelson noted that Arab-Americans, Bengalis, and Latinos in the areas in and around Detroit prefer "generally the same candidates" as Black voters. See Def. App. 040a.

---

[2]   Oct 27, 2021 Hearing at 13:01 (statement of Bruce Adelson) <https://soundcloud.com/user-504859921/audio-closed-session-micrc-oct-27-released-dec-20-per-msc?si=6a87f383054a48b4bd27ad6c59c892b4&utm_source=clipboard&utm_medium=text&utm_campaign=social_sharing> (accessed Jan 18, 2022).

D.      Dr. Handley conducted further analysis and subsequently presented a final re-port on polarized voting (the "Final Report").[3] The Final Report provided a more extensive analysis of elections. It identifies, in the appendices, over one hundred election outcomes, including both general and primary results from 2012 through 2020. Def. App. 076a–117a. The Final Report concludes that "in no county is a 50% BVAP district required for the Black-preferred candidates to carry the district in a general election." *Id.* at 062a. Dr. Handley also concluded that in Wayne County, the "Black-preferred candidate would win every general election in a district with a BVAP of 35% or more, and would win with at least 54.4% of the vote – and in most election contests, a substantially higher percentage . . . ." *Id.* The same result holds for Genesee County: at 35% BVAP, Black-preferred candidates win every general election analyzed in Dr. Handley's study. *Id.* For Oakland and Saginaw Counties, the Final Report concludes a 40% BVAP is required for Black-preferred candidates to win every single general election contest. *Id.*

Dr. Handley's analysis of congressional, senate, and house contests from 2018 to 2020 in Wayne, Genesee, Oakland and Saginaw Counties reached a similar result. First, she found that 69% (58 of 84) of contested elections she could analyze were not polarized, meaning white and Black voters preferred the same candidate(s). Def. App. 049–051a. Second, Dr. Handley found that in those general elections that were racially polarized, the minority-pre-ferred candidate prevailed in 11 out of 12 elections (91.7%). *Id.* In polarized primaries, the minority-preferred candidate prevailed in 8 out of 14 elections (57.1%). *Id.* Combining the general and primary yields a total of 19 out of 26 elections, or 73%, in which the minority-

---

[3] The Final Report was originally dated December 28, 2021, but was slightly revised and re-published on January 4, 2022.

13

preferred candidate prevailed in a racially polarized election. And many elections are not po-

larized, either because of a lack of Black cohesion or of white cohesion. Altogether, in 77 out

of 84 contested races (91.6%), because Black and white voters supported the same candidates.

## V.    The Commission Adopts The 2021 Plans

On December 28, 2021, the Commission voted on, and adopted, Michigan's final

maps. Prior to the final vote, the Commission reviewed its federal compliance tracker—a

wide-ranging spreadsheet of data collected to inform the Commission's understanding of its

legal obligations—to view VRA compliance data for each collaborative map.[4] The enacted

plans afford Black voters in the Detroit metropolitan region significant opportunities to elect

their preferred candidates, as measured by Dr. Handley's findings. The following charts iden-

tify the BVAP of every enacted district that contains any part of Wayne County:

| Chestnut Map Congressional District | Counties | NH Black VAP |
|---|---|---|
| 12 | Oakland Wayne | 43.81% |
| 13 | Wayne | 44.70% |

| Linden Map Senate District | Counties | NH Black VAP |
|---|---|---|
| 1 | Wayne Washtenaw | 35.03% |
| 2 | Wayne | 24.47% |
| 3 | Oakland Macomb Wayne | 42.09% |
| 4 | Wayne | 13.32% |
| 5 | Wayne | 18.25% |
| 6 | Oakland Wayne | 39.15% |
| 7 | Oakland | 44.78% |

---

[4] See Dec 28, 2021 Hearing at 05:09:30 <https://youtu.be/IcKJ65GSfaM?t=18548> (ac-
cessed Jan. 18, 2022).

|  | Wayne |  |
|---|---|---|
| 8 | Oakland Wayne | 40.25% |
| 10 | Macomb Wayne | 40.43% |
| 11 | Macomb Wayne | 2.18% |

| Hickory Map House District | Counties | NH Black VAP |
|---|---|---|
| 1 | Wayne | 38.03% |
| 2 | Wayne | 11.04% |
| 3 | Wayne | 32.82% |
| 4 | Wayne | 55.60% |
| 5 | Oakland Wayne | 55.31% |
| 6 | Oakland Wayne | 54.93% |
| 7 | Oakland Wayne | 44.29% |
| 8 | Oakland Wayne | 43.70% |
| 9 | Wayne | 51.65% |
| 10 | Wayne | 38.79% |
| 11 | Macomb Wayne | 42.82% |
| 12 | Macomb Wayne | 40.99% |
| 13 | Macomb Wayne | 38.36% |
| 14 | Macomb Wayne | 41.11% |
| 15 | Wayne | 7.18% |
| 16 | Wayne | 54.92% |
| 17 | Wayne | 42.43% |
| 22 | Wayne | 2.24% |
| 23 | Oakland Washtenaw Wayne | 4.78% |

| 24 | Wayne | 9.84% |
|----|-------|-------|
| 25 | Wayne | 19.62% |
| 26 | Wayne | 35.82% |
| 27 | Wayne | 2.93% |
| 28 | Monroe Wayne | 9.14% |
| 29 | Monroe Wayne | 11.83% |
| 31 | Monroe Washtenaw Lenawee | 15.72% |

Accordingly, for districts wholly or partially within Wayne County, there are two congressional districts (CD-12 and CD-13) that contain at least 40% BVAP; in the State Senate, there are six districts (SD-1, SD-3, and SD-6 to SD-8, and SD-10) that contain at least 35% BVAP; and in the State House, there are 15 districts (HD-1, HD-4 to HD-14, HD-16 to HD-17, and HD-26) with at least 35% BVAP, and five of those (HD-4, 5, 6, 9, and 16) have greater than 50% BVAP.[5]

## STANDARD OF REVIEW

This case falls within this Court's "original jurisdiction" to "review a challenge to any plan adopted by the commission" and determine whether the plan "compl[ies] with the requirements of [the Michigan] constitution, the constitution of the United States or superseding federal law." Const 1963, art 4, § 6(19). As a result, "[i]t is this Court's duty . . . to determine what are the requirements of" the law and ascertain "the meaning of those requirements

---

[5] Plaintiffs allege that the congressional plan was backed only by eight of the thirteen commissioners. However, the enacted congressional plan (known as the "Chestnut plan") was listed as the first or second preference by eleven of the thirteen members of the commission. Chair Szetela noted that while both the Chestnut and another map (known as the "Birch plan") were favored by large numbers of public commenters, the Chestnut map contained districts with higher BVAPs. Likewise, the enacted senate map was listed as the first or second preference by eleven of the thirteen members of the commission, garnering a final vote of nine commissioners.

in specific applications." *In re Apportionment of State Legislature—1982*, 413 Mich at 114. The Commission's redistricting plans have the effect of Michigan laws. Const 1963, art 4, § 6(22). Accordingly, Plaintiffs "must overcome the presumption that" the plans are "constitutional, and" they "'will not be declared unconstitutional unless clearly so, or so beyond a reasonable doubt.'" *People v Carp*, 496 Mich 440, 460; 852 NW2d 801 (2014) (quoting *Cady v Detroit*, 289 Mich 499, 505; 286 NW 805 (1939)). To establish a VRA claim, the plaintiff bears the burden of proving the elements of the claim "by a preponderance of the evidence." *Rodriguez v Bexar County, Tex*, 385 F3d 853, 859 (CA 5, 2004).

## ARGUMENT

### I. Plaintiffs' Voting Rights Act Claim Lacks Merit

Plaintiffs fail to make any of the threshold showings essential to a viable Section 2 claim. As discussed above, a Section 2 plaintiff must establish each of three preconditions set forth in *Thornburg v Gingles*, 478 US at 30, known as the *"Gingles* preconditions": (1) "the minority group must be able to demonstrate that it is sufficiently large and geographically compact to constitute a majority in a single-member district," (2) "the minority group must be able to show that it is politically cohesive," and (3) "the minority must be able to demonstrate that the white majority votes sufficiently as a bloc to enable it . . . usually to defeat the minority's preferred candidate." *Id.* at 50–51. These are "three necessary, but not sufficient, conditions for a plaintiff to succeed in a Voting Rights Act claim." *Mallory v Ohio*, 173 F3d 377, 380 (CA 6, 1999). "If these preconditions are met, the court must then determine under the 'totality of circumstances' whether there has been a violation of Section 2." *Lewis v Alamance County, NC*, 99 F3d 600, 604 (CA 4, 1996) (citation omitted).

17

A.   None of the Preconditions Is Satisfied

Each threshold *Gingles* precondition goes unsatisfied on Plaintiffs' evidentiary showing.

1.   The First Precondition

The first *Gingles* precondition is not satisfied because Plaintiffs have presented no illustrative version of the house, senate, and congressional plans proving that "the minority group . . . is sufficiently large and geographically compact to constitute a majority in a single-member district." *Gingles*, 478 US at 50. They fail to do so even after insisting that "[a] knowledgeable expert could redraw Defendant's three Plans to conform to the Michigan Constitution and Voting Rights Act . . . in a matter of hours" and that "[t]he cost[] would be miniscule." Br. 24. If so, Plaintiffs should have presented alternative plans. To be sure, Plaintiffs point to demographics to contend "that Michigan's Black population in the Southeastern part of the state (in and around Detroit) could provide two to four majority-Black districts in each of the three Plans." Br. 12. Although there is no reason to doubt that some number of majority-minority districts may be created "in and around Detroit," that does not end the inquiry.

a.   The first *Gingles* precondition "specifically contemplates the creation of hypothetical districts." *Magnolia Bar Ass'n, Inc v Lee*, 994 F 2d 1143, 1151 n 6 (CA 5, 1993); see also *Fairley v Hattiesburg, Miss*, 584 F3d 660, 669 n 8. (CA 5, 2009) (same). That need is apparent here because Plaintiffs' vague reference to "two to four" districts that are "majority-Black" somewhere "in and around Detroit" does little to inform the Court, the Commission, or the public precisely what, in their view, is needed to ensure minority equal opportunity—and, in turn, what maps would govern Michigan elections if they prevail. For example, their expert opines that a district that is "majority-Black" (i.e. 50% plus one) is insufficient; districts may

18

need to be drawn to 55% or even 65% BVAP. Expert Rep. ¶ 8. But it is unclear how many districts of that nature can be drawn.

What's more, the difference between two, three, and four opportunity districts could carry legal significance, so merely citing a range is not enough. For example, the enacted house plan already has *five* majority-minority districts, and Section 2 "requires a comparison between *a challenger's proposal* and the 'existing number of reasonably compact districts.'" *LU-LAC*, 548 US at 430 (citation omitted) (emphasis added). An imprecise invocation of "two to four districts" fails to establish that a better alternative to *five* majority-minority districts exists. It is also unclear whether alternative plans at 65% BVAP will comply with other criteria governing the Commission's plans. See *Abbott*, 138 S Ct at 2314 (recognizing that redistricting plans must "comply with special state-law districting rules"). The concept of concentrating Black voters at such high levels—like the prior decade's plan that was found to have "packed" Democratic voters for Republican advantage, *League of Women Voters*, 373 F Supp 3d at 918—would raise serious questions about the Commission's ability to "not provide a disproportionate advantage to any political party." Const 1963, art 4, § 6(12)(d). This concept would also raise its own VRA concerns, as vote dilution can occur through "packing" the Black community into a few districts as easily as through "cracking" it among many. See *Voinovich*, 507 US at 163. Plaintiffs should not be permitted to ignore these problems by failing to show viable alternatives.

Alternatives are essential for the additional reason that a § 2 claim fails "if the alternative to the districting decision at issue would not enhance the ability of minority voters to elect the candidates of their choice." *Abbott*, 138 S Ct at 2332. Where a plaintiff fails to "present[] evidence regarding the 'functionality' of their proposed Remedial Plan," the claim cannot succeed. See *Harding v City of Dallas, Texas*, 948 F3d 302, 309 (CA 5, 2020) (rejecting § 2 claim

on this basis). Because no alternative is presented here, the analysis cannot even begin—and must end. An alternative plan would empower experts from both sides to assess likely performance of that alternative, but no such analysis can occur in their absence. It is unknown, for example, what neighborhoods remedial districts would cover, what Black turnout exists in those neighborhoods, and whether so-called remedial districts would perform. This analysis cannot wait until a later remedial phase because "inquiries into remedy and liability cannot be separated." *Burton v City of Belle Glade*, 178 F3d 1175, 1199 (CA 11, 1999) (quoting *Nipper v Smith*, 39 F3d 1494, 1530–31 (CA 11, 1994) (en banc) (alterations adopted)).

"Courts cannot find § 2 effects violations on the basis of *uncertainty*." *Abbott*, 138 S Ct at 2333. But "uncertainty" is the best that can be said of Plaintiffs' showing.

b.        Plaintiffs' failure to provide an alternative is manifest further in their effort to avoid § 2 altogether and obtain an injunction under the completely different standard of VRA § 5—which does not apply. Plaintiffs emphasize that BVAP in some enacted districts is reduced compared to majority-minority districts of the 2011 plans. See, e.g., Br. 4, 5–6. But the standard Plaintiffs cite, called "retrogression," Amend. Compl. ¶ 9, is a § 5 standard that formerly required covered jurisdictions to establish in preclearance proceedings that new redistricting plans would "not bring about retrogression in respect to racial minorities' 'ability . . . to elect their preferred candidates of choice.'" *Alabama Legislative Black Caucus*, 575 US at 259 (quoting 52 USC 10304(b) (VRA § 5)). This standard is no longer in force because the Supreme Court disabled the coverage formula of VRA § 4. See *Shelby County v Holder*, 570 US 529; 133 S Ct 2612; 186 L Ed 2d 651 (2013). This standard does not apply today in Michigan or anywhere else.

Section 2 is different. As the Supreme Court explained in *Reno v Bossier Parochial School Bd*, 520 US 471; 117 S Ct 1491; 137 L Ed 2d 730 (1997), "[r]etrogression, by definition, requires a comparison of a jurisdiction's new voting plan with its existing plan." *Id.* at 479. "Section 2, on the other hand, was designed as a means of eradicating voting practices that 'minimize or cancel out the voting strength and political effectiveness of minority groups.'" *Id.* (citation omitted). "Because the very concept of vote dilution implies—and, indeed, necessitates—the existence of an 'undiluted' practice against which the fact of dilution may be measured, a § 2 plaintiff must also postulate a reasonable alternative voting practice to serve as the benchmark 'undiluted' voting practice." *Id.* at 480. Stated differently, the § 2 analysis measures the claim, not against prior plans, but against a hypothetical plan proffered by the challengers. See *Holder v Hall*, 512 US 874, 881; 114 S Ct 2581; 129 L Ed 2d 687 (1994) (plurality opinion); *id.* at 950–51 (BLACKMUN, J., dissenting). Because Plaintiffs present no alternative plan, no § 2 analysis is possible. Plaintiffs' references to prior plans do not make up for this failure and are inapposite. See, e.g., *Little Rock Sch Dist v Pulaski County Special Sch Dist No 1*, 56 F3d 904, 910 (CA 8, 1995) (finding error in a district court's comparing a plan challenged under § 2 against the prior plan, mistaking retrogression for dilution).

    c.    And, indeed, this case is especially inappropriate for a retrogression standard because the plans Plaintiffs utilize for comparison were created by a partisan body under a very different set of laws and policies. The 2011 congressional plan's Wayne County-area districts are as follows:[6]

---

[6] Michigan Secretary of State, 2011 Congressional Districts (excerpt) <https://www.michigan.gov/documents/cgi/congress10statewide_371463_7.pdf> (accessed Jan 17, 2022).

The BVAP of District 13 in the 2011 plan was 54.78%, and the BVAP of District 14 was 55.16%. Def. App. 050a. While District 13 was entirely contained in Wayne County, District 14 carved out a large piece of northern and eastern Wayne County and meandered deep into Oakland County.

The Commission's adopted plan is an improvement. In it, the Wayne County-area districts are as follows:[7]

---

[7] MICRC, Chestnut Final Plan (excerpt) <https://michigan.mydistricting.com/legdistricting/comments/plan/279/23> (accessed Jan 17, 2022).
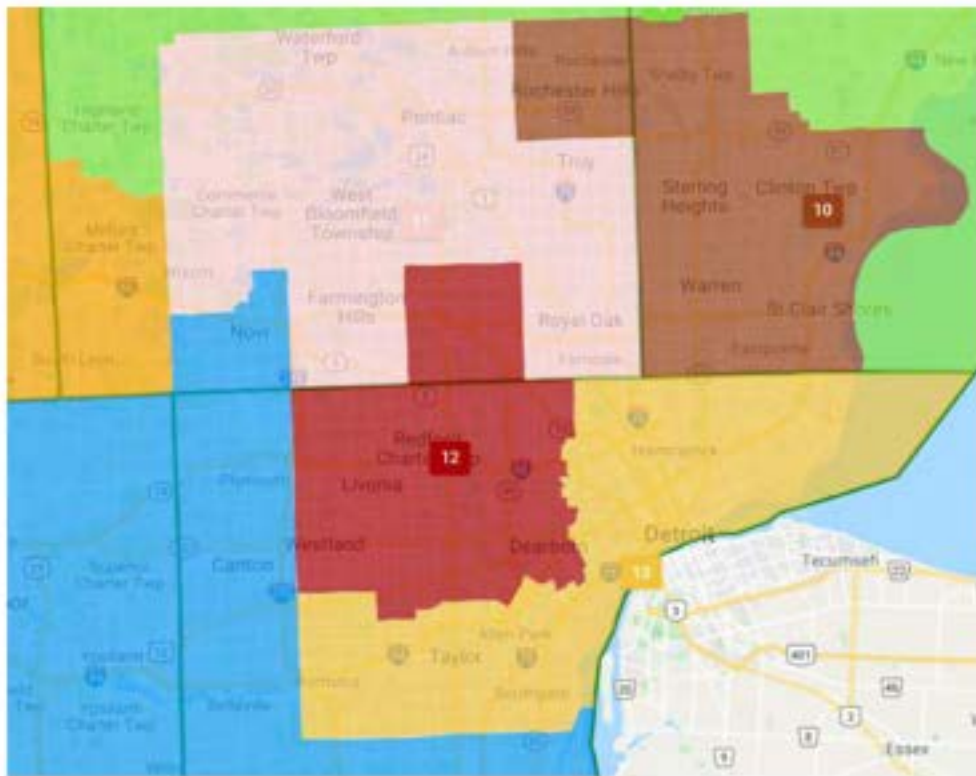
These districts better respect "traditional race-neutral districting principles," *Miller*, 515 US at 916, that did their predecessors. As noted, the BVAP of District 12 in this plan is 43.81%, and the BVAP of District 13 is 44.71%. District 13 is entirely contained in Wayne County, and District 12 is centered in Wayne County and takes in a square-shaped portion of Oakland County. The Commission's plan therefore affords Wayne County's Black voters an equal opportunity to elect the representatives of their choice, without creating the kind of "bizarre shape[d]" districts with "hook-like" appendages that "sprawl" through territory that the U.S. Supreme Court has identified as evidence of racial gerrymandering. *Bush*, 517 US at 965–66.

      d.      Yet another problem with Plaintiffs' failure to present an alternative plan is that "§ 2 allows States to choose their own method of complying with the Voting Rights Act," and this "may include drawing crossover districts." *Id.* The Commission chose this path of VRA compliance, and Plaintiffs have no basis to contest it.

Plaintiffs make spirited predictions that the Commission's enacted redistricting plans will result in minority inequality, *e.g.*, that they "would completely rob the Black minority of Michigan of its ability to elect their chosen representatives into the Michigan Senate, and halve the potential candidates they could elect to the Michigan House of Representatives." Br. 4. But Plaintiffs ignore "crossover voting patterns" and the "effective crossover districts" the Commission has created. *Bartlett*, 556 US at 24. As explained, Dr. Handley's Final Report finds high levels of white crossover voting, such that the Black community has an equal opportunity to elect its preferred candidates with 35% BVAP. Numerous districts in the Commission's plans qualify as equal-opportunity districts based on this evidence. In the House Plan, fifteen districts in Wayne County fall within that observed range, Def. App. 200a; in the Senate Plan, the number is six, Def. App. 185a; in the Congressional Plan, both of the Wayne County districts fall within the observed range. Def. App. 170a.

The proper comparison, then, is between those numbers and the number of opportunity districts in a reasonable alternative. *LULAC*, 548 US at 430 (citation omitted) (emphasis added) (Section 2 "requires a comparison between *a challenger's proposal* and the 'existing number of reasonably compact districts.'"). Plaintiffs leave the Court unable to make this comparison. Indeed, the assertion of "two to four" majority minority districts would, on its face, *disprove* a § 2 violation: with fifteen, six, and two opportunity districts, respectively, the enacted plans afford either *more* minority opportunity or the *same amount* as compared to Plaintiffs' own unsupported assertion. Plaintiffs cannot win a § 2 claim simply by proving "that lines could have been drawn elsewhere, nothing more." *Johnson*, 512 US at 1015.

In this way, the Commission followed the path the Supreme Court outlined in *Bartlett*, which held that states are not obligated to create minority crossover districts. 556 US at 13.

However, the Court left state redistricting authorities the "option to draw such districts" because they afford "a choice that can lead to less racial isolation, not more." *Id.* at 23. The Court explained that "§ 2 allows States to choose their own method of complying with the Voting Rights Act" and that this "may include drawing crossover districts." *Id.* That is what the Commission did here: it concluded—based on Dr. Handley's sound advice—that majority-minority districts are unnecessary, unjustified by the data-based body of evidence, and may concentrate Black voters in a small segment of districts in a way that diminishes, rather than enhances, Black voting strength. The Commission acted well within its discretion to choose a different "method of complying with the Voting Rights Act." *Id.*

### 2. The Second Precondition

The second *Gingles* precondition is not satisfied because Plaintiffs fall well short of showing that "the minority group . . . is politically cohesive." *Gingles*, 478 U.S. at 51. This requirement is often called in tandem with the third precondition "racially polarized voting." *Id.* at 52. "[T]he results test does not assume the existence of racial bloc voting; plaintiffs must prove it." *Id.* at 46; *Growe v Emison*, 507 US 25, 42; 113 S Ct 1075; 122 L Ed 2d 388 (1993) (same). Plaintiffs must show that "a significant number of minority group members usually vote for the same candidates." *Levy v Lexington County, SC*, 589 F3d 708, 719–20 (CA 4, 2009). "[A] pattern of racial bloc voting that extends over a period of time is more probative of a claim that a district experiences legally significant polarization than are the results of a single election." *Gingles*, 478 US at 57. Endogenous elections, involving the same office as the Section 2 challenge involves, are more probative than exogenous elections, involving different offices. See, e.g., *Bone Shirt v Hazeltine*, 461 F3d 1011, 1021 (CA 8, 2006); *Johnson v Hamrick*, 196 F3d 1216, 1222 (CA 11, 1999).

25

Plaintiffs fail to present a racial bloc voting analysis and rely solely on impermissible assumptions. To begin, their brief cites just two elections, Br. 12, which is an insufficient basis to prove voting trends, cf. *Uno v City of Holyoke*, 72 F3d 973, 989 (CA 1, 1995) (finding clear error where only four of eleven elections analyzed supported the second and third *Gingles* preconditions). Plaintiffs cite no case finding a Section 2 violation on the basis of just two elections. Nor is the Court likely to find one: "[S]ection 2 focuses on 'larger trends' and on 'pattern[s] of racial bloc voting that extend[ ] over a period of time.'" *Wright v Sumter County Bd of Elections & Registration*, 979 F3d 1282, 1310 (CA 11, 2020) (quoting *Johnson*, 196 F3d at 1074). Further, one of the elections, the 2020 presidential contest, is exogenous to all of the bodies at issue here. Br. 12 (relying on alleged voting patterns for candidates Trump and Biden). The other is exogenous to the House and Senate. *Id.* (relying on alleged voting patterns in a primary for the 13th Congressional district). These are the least probative of elections. *Bone Shirt*, 461 F3d at 1021. Plaintiffs cite no House or Senate election in which minority voting is even alleged to be cohesive. They simply ask the Court to "assume" cohesion, which is improper, *Gingles*, 478 US at 51.

Besides, Plaintiffs fail to substantiate voting patterns even as to the two races they cite. Because of the secret ballot, it is unknown from reported election results whether members of different racial groups tended to support different candidates, and § 2 plaintiffs therefore rely on statistical estimates to make reliable inferences on this topic. See, e.g., *Gingles*, 478 US at 52–53 (relying on an expert analysis that "evaluated data from 53 General Assembly primary and general elections" and "subjected the data to two complementary methods of analysis— extreme case analysis and bivariate ecological regression analysis—in order to determine whether blacks and whites in these districts differed in their voting behavior" (footnote omitted)); see also *Clerveaux v E Ramapo Cent Sch Dist*, 984 F3d 213, 225 (CA2, 2021)

26

(describing the current state of expert methods, including eological regression and ecological inference). Courts ignore election outcomes in the absence of a reliable statistical study establishing racial preferences in those elections. See *Wright v Sumter County Bd of Elections & Registration*, 301 F Supp 3d 1297, 1317 (MD Ga, 2018) (declining to consider results of races involving Black candidates because "[n]either side has presented a statistical analysis of these races. There is thus no evidence of whether there was a black-preferred candidate in those races."); *Wright*, 979 F3d at 1308 (affirming this ruling).

Plaintiffs offer no statistical analysis. They ask the Court to infer from the fact that the 13th Congressional District primary loss of a Black candidate to a "non-Black" candidate establishes cohesive support for the Black candidate. Br. 12. But, for all the Court knows, the loss was because of a lack of cohesive voting for the Black candidate—which may be suggested from the "very high Black voting age population" in the district, *id.* at 12—or else the Black candidate was not the candidate of choice of the Black community. In effect, Plaintiffs ask the Court to engage in racial stereotyping and assume that the Black community is cohesive around every Black candidate. That is improper.[8] See *Lewis*, 99 F3d at 607 ("[T]he minority-preferred candidate may be either a minority or a non-minority . . . ."). Plaintiffs also ask the Court to infer racial voting patterns from the 2020 presidential contest, but, without a statistical study, this calls for speculation. *Wright*, 979 F3d at 1308.

3.    The Third Precondition

The third *Gingles* precondition is not satisfied because Plaintiffs present no evidence that "the white majority votes sufficiently as a bloc to enable it . . . usually to defeat the mi-

---

[8] In fact, it is unfounded. Dr. Handley's Final Report shows that 62.7% of Black voters voted for the non-Black candidate, Rashida Tlaib. Def. App. 105a.

nority's preferred candidate." *Gingles*, 478 US at 51. As the term "usually" suggests, this showing requires proof that over the course of many elections, the minority-preferred candidate loses more often than not. *Lewis*, 99 F3d at 616 (observing that "a court would ineluctably find" failure on this element in "circumstances" where "minority-preferred candidates were successful fifty percent of the time"); see also *Cottier v City of Martin*, 604 F3d 553, 560 (CA 8, 2010) (en banc); *Clay v Bd of Ed of City of St Louis*, 90 F3d 1357, 1362 (CA 8, 1996). Plaintiffs' failure to present a pattern of elections forecloses their ability to establish this precondition.

Plaintiffs' arguments on this precondition miss the mark.

### (a)    The Handley Report

Plaintiffs contend that the Commission's expert, "Dr. Lisa Handley[,] conducted a racially polarized voting analysis for the Michigan Independent Citizens Redistricting Commission in which she concluded that racial bloc voting exists in Michigan." Br. 13 (footnote omitted). Plaintiffs argue that this is sufficient to prove the third precondition, but overlook the difference between "racially polarized voting" and "*legally significant* white bloc voting." *Gingles*, 478 US at 56 (emphasis added). In doing so, Plaintiffs ask this Court to make the same mistake that resulted in the invalidation of dozens of majority-minority districts in other states last decade.

A political scientist can accurately describe voting as "polarized" in any "circumstance in which 'different races vote in blocs for different candidates.'" *Covington v North Carolina*, 316 FRD 117, 167 (MDNC 2016) (three-judge court), *aff'd*, 137 S Ct 2211 (2017) (quoting *Gingles*, 478 US at 62). For example, if 51 percent of Black voters vote for a candidate who receives the vote of only 49 percent of white voters, voting would be "polarized." *Id.* at 170. "However, the third *Gingles* precondition requires racial bloc voting that is 'legally significant'—that is, majority bloc voting at such a level that it enables the majority group 'usually

28

to defeat the minority's preferred candidates.'" *Id.* at 167 (quoting *Gingles*, 478 U.S. at 56). Specifically, *Gingles* held that "a white bloc vote that normally will defeat the combined strength of minority support <u>plus white 'crossover' votes</u> rises to the level of legally significant white bloc voting." 478 US at 56 (underlining added). In the above hypothetical, 49% white crossover voting is substantial, likely ensuring that the minority preferred candidates win, and making it unlikely that the polarized voting is legally significant. *Bartlett*, 556 US at 24 ("In areas with substantial crossover voting it is unlikely that the plaintiffs would be able to establish the third *Gingles* precondition—bloc voting by majority voters.").

The problem with Plaintiffs' analysis is that they rely selectively on Dr. Handley's findings of "polarized" voting, without acknowledging the degree of "white 'crossover' votes." *Gingles*, 478 US at 56. Although Dr. Handley did determine that there is some degree of polarized voting in Michigan, she determined that it does not exist at sufficiently high levels to necessitate majority-minority districts. Dr. Handley explained that "in no county is a 50% BVAP district required for the Black-preferred candidates to carry the district in a general election." Def. App. 062a. In Wayne County, Dr. Handley relied on a thorough analysis of dozens of races—including Democratic primaries—to conclude that districts of 35% or more BVAP are likely to afford the Black community an equal opportunity to elect. *Id.*, Tbl. 5.

This expert opinion—based on an analysis dwarfing Plaintiffs' analysis by orders of magnitude—indicates that white bloc voting is not "legally significant." *Gingles*, 478 US at 56. As *Covington* explained, white bloc voting is only legally significant if it "exist[s] at such a level that the candidate of choice of African-American voters would usually be defeated <u>without a VRA remedy</u>." *Covington*, 316 FRD at 168 (underlining added). A VRA remedy is a 50% minority VAP district. See *Bartlett*, 556 US at 19. Dr. Handley's conclusion that white

crossover voting exists at a sufficient level that 50% BVAP districts are not necessary anywhere in Michigan, including in Detroit, means that white bloc voting does not rise to a legally significant level. *Voinovich*, 507 US at 157–58 ("[I]n the absence of significant white bloc voting it cannot be said that the ability of minority voters to elect their chosen representatives is inferior to that of white voters."); *Abrams v Johnson*, 521 US 74, 93; 117 S Ct 1925; 138 L Ed 2d 285 (1997) (finding the third precondition unmet because of a "the 'general willingness' of whites to vote for blacks"); *Cooper*, 137 S Ct at 1470 (finding no evidence of the third precondition where "a meaningful number of white voters joined a politically cohesive black community to elect that group's favored candidate").

Plaintiffs tender an argument strikingly similar to the one rejected in *Covington*. After finding that the North Carolina General Assembly engaged in racially predominant redistricting by purposefully creating majority-minority districts, 316 F.R.D. at 129–65, the *Covington* court concluded that the General Assembly failed to justify its race-based redistricting under § 2, because the record before it at the time of redistricting did not establish the third *Gingles* precondition, *id.* at 167–74. It concluded this, even though the General Assembly employed a statistical expert who opined "that there is 'statistically significant racially polarized voting in 50 of the 51 counties' studied." *Id.* at 169 (quoting the report). The *Covington* court held that legislators' choice to draw majority-minority districts based on this analysis "demonstrates their misunderstanding of *Gingles*' third factor," as they bypassed the "crucial difference between legally significant and statistically significant racially polarized voting." *Id.* at 170 (underlining in original). North Carolina's error was that the General Assembly "never made any determination whether majority bloc voting existed at such a level that the candidate of choice of African-American voters would usually be defeated without a VRA remedy." *Id.* at 168.

30

As a result of this error, the General Assembly's racially predominant redistricting (arbitrarily creating dozens of majority-minority districts without the required VRA analysis) lacked a § 2 justification, resulting in "the most extensive unconstitutional racial gerrymander ever encountered by a federal court." *Covington v North Carolina*, 270 F Supp 3d 881, 892 (MDNC 2017). The U.S. Supreme Court summarily affirmed that decision by a unanimous vote. *North Carolina v Covington*, 137 S Ct 2211 (2017); see also *Covington*, 270 F Supp 3d at 892 ("The Supreme Court affirmed that conclusion <u>without argument and without dissent</u>. And the Supreme Court <u>unanimously</u> held that Senator Rucho and Representative Lewis incorrectly believed that the Voting Rights Act required construction of majority-minority districts[.]" (underlining in original)).[9] A three-judge panel in Illinois reached a similar conclusion in a recent § 2 case, finding the third precondition unmet because of "significant crossover voting by non-Latino voters . . . , ranging from more than twenty-five to seventy percent non-Latino voter support for the Latino candidate of choice in at least eight [analyzed] elections." *McConchie*, 2021 WL 6197318, at *8.

Here, as in *Covington*, an expert has opined that there is polarized voting in Michigan. And, like the General Assembly in *Covington*, Plaintiffs believe that this finding is sufficient to

---

[9] Redistricting challenges to statewide redistricting plans are adjudicated in federal court by three-judge panels, including at least one judge from the local court of appeals (Fourth Circuit Judge James A. Winn, Jr., presided in *Covington*). 28 USC 2284(a); see *Shapiro v McManus*, 577 US 39; 136 S Ct 450; 193 L Ed 2d 279 (2015). Losing parties have an appeal as of right to the U.S. Supreme Court. 28 USC 1253. When the Supreme Court summarily affirms, it affords the judgment of the district court binding effect under the doctrine of stare decisis as to holdings "essential to sustain that judgment." *Illinois State Bd of Elections v Socialist Workers Party*, 440 US 173, 183; 99 S Ct 983; 59 L Ed 2d 230 (1979); *Comptroller of Treasury of Md v Wynne*, 575 US 542, 559–60; 135 S Ct 1787; 191 L Ed 2d 813 (2015). The Covington court's holding regarding the definition of legally significant racially polarized voting is such a holding, since the result would have been the opposite without it.

establish the third *Gingles* precondition. Br. 13. The difference in this case is that the Commission *avoided* North Carolina's error. Dr. Handley recognized that 50% BVAP districts are not necessary in Michigan because of the strong levels of white crossover voting, and her conclusion is amply supported in her thorough report. For example, in 2018 Wayne County State Senate races—endogenous elections—white crossover voting for Black-preferred candidates ranged from 43.8% to 48.8%.[10] Def. App. 095a. In 2018 Wayne County State House races—endogenous elections—white crossover voting for Black-preferred candidates ranged from 36.2% to **85.5%**. *Id.* at 097a. And in 2018 Congressional District 13 (in Detroit) saw 64.5% white support for the Black-preferred candidate. *Id.* at 094a; see *McConchie*, 2021 WL 6197318, at *8 (finding the third precondition unsatisfied on similar evidence).

Plaintiffs complain that "**Defendant looked only at general election data**," Br. 21 (emphasis in original), but they are wrong. Dr. Handley did review primary data. See Def. App. 105a–06a. Dr. Handley made use of the only primary data that was available, and it exhibits similarly high levels of white crossover voting, as 72% of white voters favored the Black-preferred candidate in the 2020 Congressional District 13 primary, *id.* at 105a, and white crossover voting for the Black-preferred candidate[11] in Senate races ranged from 19% to 56%, *id.* at 106a. It is *Plaintiffs* who make the error of not looking at primaries: the Court will not find any polarized voting analysis of any primary election (or any election at all) in their presentation. Meanwhile, Dr. Handley's analysis shows that Black-preferred candidates were

---

[10] This brief focuses on Dr. Handley's ecological inference (EI) estimates, as EI is the most robust estimation method. Def. App. 043a–044a.

[11] Many Senate races exhibit a lack of cohesion, as Black support did not exceed 50% for any candidate. See *Levy*, 589 F3d at 708 n.18 (holding that minority support at less than majority levels "demonstrate[s] a lack of political cohesiveness," even in multi-candidate races). The focus here is on races where a clear Black-preferred candidate drew cohesive support from the Black community.

*successful* in approximately 70% of contests that saw polarization. Plaintiffs cannot show that white bloc voting is "usually" sufficient "to defeat the minority's preferred candidate," *Gingles*, 478 U.S. at 50–51, when the minority-preferred candidate *usually wins*.

      (b)      <u>Plaintiffs' Remaining Arguments On The Third *Gingles* Precondition</u>

Plaintiffs offer scant additional evidence regarding the third *Gingles* precondition, and their arguments are unpersuasive.

First, Plaintiffs make references to elections held before 1954 and again in 1964. Br. 13. This information is inapposite and out of date. "The more recent an election, the higher its probative value." *Bone Shirt*, 461 F3d at 1021. Courts have found data from even a decade or two before a redistricting too old to be of any use. See *Bethune-Hill v Va State Bd of Elections*, 326 F Supp 3d 128, 179 n 61 (ED Va 2018) (three-judge court) ("We decline to consider the Loewen report here because, among other reasons, the underlying data was based on electoral results from the 1990s and thus was outdated for purposes of the 2011 redistricting."). Evidence from 58 years (and more) ago says nothing of current voting patterns in Detroit.

Second, Plaintiffs argue that "[a]nother example is the 2012 Michigan House of Representatives race in the 1st District (West Detroit),[12] in which Black candidate Brian Banks ran in the primary election, but the Grosse Point Democrats official organization flat out refused to endorse Banks, the Democratic nominee." Br. 13. This cryptic assertion speaks to party organizations, not the voting public. In fact, Mr. Banks *won* both the Democratic primary and the general election, notwithstanding the party's non-endorsement.[13]

---

[12] The district was in east Detroit, not "West Detroit."

[13] *Detroiters Elect Ex-Con Brian Banks as State Rep*, Nov. 7, 2012 (available at https://detroit.cbslocal.com/2012/11/07/detroiters-elect-ex-con-brian-banks-as-state-rep/) (accessed Jan. 18, 2022).

Third, Plaintiffs rely on a memorandum of the Michigan Department of Civil Rights, Br. 6, but that memorandum exhibits the same flaws as Plaintiffs' contentions, Ex. A (relying on outdated elections and assertions unrelated to the *Gingles* preconditions). Importantly, the assertions of a state government civil-rights organization regarding vote dilution are insufficient to justify majority-minority districts. Indeed, the U.S. Supreme Court refused to "accord deference to the [U.S.] Justice Department's interpretation of the [Voting Rights] Act" and has invalidated as racial gerrymanders districts that the Justice Department's Voting Rights Section *ordered states to enact*. See *Miller*, 515 US at 923. In *Miller*, the Voting Rights Section refused to preclear a Georgia congressional redistricting plan under Section 5 of the Act without the inclusion of three majority-minority districts, and Georgia dutifully complied with that dictate. *Id.* at 906–08. That was a mistake. The Supreme Court found compliance with the Voting Rights Section's directive to amount to racial predominance, *id.* at 917–18, and concluded that the Voting Rights Section had gotten the law wrong: "Georgia's drawing of the Eleventh District was not required under the Act because there was no reasonable basis to believe that Georgia's earlier enacted plans violated § 5." *Id.* at 923. The legal error was the Voting Rights Section's, but the loser was Georgia, whose redistricting plan was invalidated as a racial gerrymander. If the Voting Rights Section cannot justify majority-minority districts, the Michigan Department of Civil Rights fares no better. See also *Shaw v Hunt*, 517 US 899, 912–13; 116 S Ct 1894, 1904; 135 L Ed 2d 207 (1996) (*Shaw II*); (similar invalidation of majority-minority districts demanded by the Voting Rights Section); see *id.* at 913 ("We again reject the Department's expansive interpretation of § 5.").

B.     Totality of the Circumstances

Because Plaintiffs have failed to establish the *Gingles* preconditions, the Court need not, and should not, reach their arguments regarding the so-called "Senate Factors." See Br.

34

13–23. The *Gingles* preconditions are threshold factors that must be satisfied: "Unless these points are established, there neither has been a wrong nor can be a remedy." *Growe*, 507 U.S. at 40–41. In any event, virtually nothing Plaintiffs say on the topic comes supported with admissible evidence. Many of Plaintiffs' assertions appear to have been lifted directly from Wikipedia.[14]

  C. Plaintiffs Ignore The Commission's Obligation To Avoid Or Justify Racially Predominant Redistricting

Plaintiffs ignore the difficulties the Commission faced, tendering the refrain that "drawing up redistricting plans . . . is relatively simple." Br. 20. The U.S. Supreme Court disagrees. "Redistricting is never easy." *Abbott*, 138 S Ct at 2314. What Plaintiffs miss in all their arguments is that the Commission was not free to create majority-minority districts simply to be safe. Only if the *Gingles* preconditions were established would majority-minority districts be justified, but "if not, then not." *Cooper*, 137 S Ct at 1470. Creating majority-minority districts presented a significant legal risk because doing so would trigger the "strictest scrutiny" under the federal Equal Protection Clause, *Miller*, 515 US at 915, and require the Commission to, in effect, prove a § 2 claim against itself with data available at the time of redistricting, *Cooper*, 137 S Ct at 1470. The Commission undertook this task with the utmost seriousness, hiring a renowned VRA expert and an attorney devoted solely to VRA advice, and using data, not arbitrary racial targets, to drive its decisions. That body of evidence undercuts any claim that the Commission could satisfy the *Gingles* preconditions—particularly, the third precondition—to justify districts drawn at or above 50% BVAP. To go ahead with creating racially

---

[14] *Compare* Br. at 17 (asserting 47% of adults in Detroit are functionally illiterate and that eighth graders scored lowest in math and reading in the nation) *with* https://en.wikipedia.org/wiki/Educational_inequality_in_southeast_Michigan#Literacy_rates (accessed Jan. 18, 2022); *compare id.* (citing Detroit poverty rate in 2016) *with* https://en.wikipedia.org/wiki/Educational_inequality_in_southeast_Michigan#Socioeconomic_status (accessed Jan. 18, 2022).

predominant majority-minority districts in spite of that evidence would be the redistricting equivalent of waltzing down I-94 during rush hour, blind-folded.

Indeed, Plaintiffs' case bears all the hallmarks of the kind of erroneous reasoning that recently led courts to strike down majority-minority districts as illegal racial gerrymanders. As explained, Plaintiffs' insistence that the third *Gingles* precondition is satisfied on any level of polarization, and without a reliable measure of white crossover voting, mirrors the North Carolina General Assembly's error in *Covington*. In addition, Plaintiffs' insistence that majority-minority districts be drawn to 55% or even 65% BVAP, Expert Rep. ¶ 8, has all the features of *Bethune-Hill*, 326 F Supp 3d at 128, which invalidated 11 majority-minority districts in Virginia because "the legislature employed a 55% BVAP threshold in drawing each of the challenged districts." *Id.* at 144. Like Plaintiffs' assertions here, the 55% figure in *Bethune-Hill* was infirm because there was no "analysis of any kind to determine the percentage of black voters necessary to comply" with the VRA. *Id.* at 176. Meanwhile, Plaintiffs' assertion that BVAP reductions should not have occurred follows the flawed path condemned in *Alabama Legislative Black Caucus*. 575 US at 277–78. And much of Plaintiffs' brief impliedly invokes "a policy of maximizing the number of majority-black districts," which doomed redistricting plans in North Carolina and Georgia, *Shaw II*, 517 US at 913, as well as Texas, *Bush*, 517 US at 957.

In short, Plaintiffs' papers read like a roadmap to equal-protection quagmires. They satisfy none of the *Gingles* factors and instead demand race-based redistricting based on "the perception that members of the same racial group . . . think alike, share the same political interests, and will prefer the same candidates at the polls." *Shaw I*, 509 US at 647. The Supreme Court "rejected such perceptions . . . as impermissible racial stereotypes, *id.*, and the Commission did not employ them in this redistricting. This Court should not compel the

36

Commission to employ them now. It should decline the invitation to force the state into an equal-protection violation the Commission soundly, and correctly, avoided.

## II.   Plaintiffs' Communities of Interest Arguments Lack Merit

Plaintiffs also contend that the enacted plans contravene Subsection 13(c) of Article 6, which mandates that districts "shall reflect the state's diverse population and communities of interest." Const 1963, art 4, § 6(13)(c); Amend. Compl. ¶ 51. This argument is undeveloped and, at times, appears coterminous with Plaintiffs' VRA argument. See *id.* Amend. Compl. ¶¶ 40–51 (alleging VRA claim and referencing Subsection 13(c) at the end). To the extent the position carries any independent weight in Plaintiffs' case, it carries no legal force, for two reasons.

A.   This Court is not positioned to choose the Commission's communities of interest for it. The Constitution plainly delegates the task of identifying and "reflect[ing]" communities of interest to the Commission, Const 1963, art 4, § 6(13)(c), a political (though non-partisan) body equipped to handle "that highly political task" of redistricting, *Growe*, 507 US at 33. To second guess the Commission's communities-of-interest choices would invade the Commission's constitutionally created sphere and decide a non-justiciable political question.

First, the political choices of identifying and preserving communities of interest is "committed by the text of the Constitution to" the Commission, see *House Speaker v Governor*, 443 Mich 560, 574; 506 NW2d 190 (1993), which the Constitution carefully structures to be trusted with redistricting discretion, see Const 1963, art 4, § 6(1). The Commission's authority, within its sphere, is exclusive: "No other body shall be established by law to perform functions that are the same or similar to those granted to the commission in this section." *Id.* art 4, § 6(22); see also *id.* art 4, § 6 ("In no event shall any body, except the independent citizens redistricting commission acting pursuant to this section, promulgate and adopt a redistricting plan or plans for this state.").

37

Second, for this Court to pick and choose communities of interest would "demand that [it] move beyond areas of judicial expertise," *Makowski v Governor*, 495 Mich 465, 472 (2014), as there is no "constitutionally based, judicially manageable standard" to decide what communities will be included within electoral districts, *Vieth v Jubelirer*, 541 US 267, 291; 124 S Ct 1769; 158 L Ed 2d 546 (2004) (plurality opinion). The concept of a community of interest is "inherently subjective." *Prejean v Foster*, 227 F3d 504, 513 n.15 (CA 5, 2000) (citation omitted). There are as many notions of how to "reflect" them as there are residents of Michigan. That is why the Commission exists: to make those choices through the carefully calibrated structure the Constitution creates.

Third, for that reason, "prudential considerations . . . counsel against judicial intervention" into this arena. *Makowski*, 495 Mich at 472. The Commission conducted innumerable public meetings and collected innumerable public comments in a process that cannot seriously be challenged as lacking responsiveness to public input. For the Court to intrude on the request of a few voters, with no public information-gathering process and no meaningful way—as a judicial body—to conduct one, would insult the Commission and the voting public that entrusted *it* with the task of fashioning plans to honor the state's diversity and communities of interest.

To be sure, the Court may have some role in enforcing this provision, but it is not implicated here. For one thing, there are judicially manageable standards for determining that the Commission chose an improper community of interest, as the Constitution clarifies that "Communities of interest do not include relationships with political parties, incumbents, or political candidates." Const 1963, art 4, § 6(13)(c). But there is no allegation here that the Commission established districts on any of these bases, and none could colorably be made. For another thing, the Court may have a role in assessing whether "there is evidence that the

[Commission] considered the constitutional requirement of [communities of interest] in reconciling the different demands upon it in drawing legislative districts." *Vesilind v Va State Bd of Elections*, 295 Va 427, 448; 813 SE2d 739 (2018). This good faith standard may empower judicial intervention if the Commission were, somehow, to completely ignore the requirement. But, again, no allegation to that effect is possible here. Plaintiffs' challenge, by contrast, amounts to mere disagreement with the Commission's choices. The fact that the Commission could have chosen differently cannot form the basis of a legal claim.

B.     Even if some standard existed to adjudicate this claim, Plaintiffs' position would fall on the wrong side because the federal Equal Protection Clause forbids the Commission from defining communities of interest on the basis of race. As recounted above, the U.S. Supreme Court has repeatedly condemned racial stereotyping in redistricting. *Shaw I*, 509 U.S. at 647. As part of that doctrine, the Court has forbidden using race as "a proxy" for otherwise legitimate redistricting criteria, such as "political characteristics." *Bush*, 517 US at 968; *Bethune-Hill*, 326 F Supp 3d at 142 ("[I]f a legislature uses race as a proxy for a legitimate districting criterion . . . this consideration of race likewise is subject to strict scrutiny.").

Plaintiffs, however, define their communities-of-interest contention solely in racial terms, asking the Court to require the Commission to draw districts to (in an unknown way) reflect "the Black community of Michigan." Amend. Comp. ¶ 10. To enforce that request would force the Commission to use race as a proxy for communities of interest, triggering strict scrutiny and placing the State Constitution into conflict with the Equal Protection Clause. That would be an unforced error. See *Parents Involved in Community Sch v Seattle Sch Dist No 1*, 551 US 701, 748; 127 S Ct 2738; 168 L Ed2d 508 (2007) ("The way to stop discrimination on the basis of race is to stop discriminating on the basis of race.").

39

### III.   Plaintiffs Are Not Entitled To Declaratory or Injunctive Relief

Because Plaintiffs' claims do not succeed on the merits, they are not entitled to any relief, injunction, declaratory, or otherwise. Indeed, their arguments concerning injunctive relief are puzzling.

A.     Plaintiffs invoke the standard governing "a preliminary injunction" and tender arguments concerning, among other things, the "the likelihood that the party seeking the injunction will prevail on the merits." Br. 8 (citation omitted); see also *id.* at 23–25. But the briefing before the Court *addresses* the merits. The rule governing original proceedings authorizes pleadings, an appellant opening and reply brief, an appellee brief, attachments—and then the case is "submitted for a decision." MCR 7.306(I). The case is ready for adjudication on the merits. As shown, Plaintiffs' claims fail and, besides, are not likely to succeed with further proceedings, if any were afforded. No injunction may issue for that reason.

B.     Regardless, Plaintiffs fail to address unique factors governing "[c]ourt orders affecting elections," which "can themselves result in voter confusion and consequent incentive to remain away from the polls." *Purcell v Gonzalez*, 549 US 1, 4–5; 127 S Ct 5; 166 L Ed 2d 1 (2006). Election-related injunctions are "so serious" that "the Supreme Court has allowed elections to go forward even in the face of an undisputed constitutional violation." *Sw Voter Registration Ed Project v Shelley*, 344 F3d 914, 918 (CA 9, 2003). Michigan precedent is to the same effect. See, e.g., *Kavanagh v Coash*, 347 Mich 579, 583; 81 NW2d 349 (1957); *Senior Accountants,, Analysts & Appraisers Ass'n v City of Detroit*, 218 Mich App 263, 270; 553 NW2d 679 (1996). The Court is therefore obligated to consider—even if it finds merit in Plaintiffs' claim—whether injunctive relief will do more harm than good, under the circumstances. Several factors compel an affirmative answer to that question.

First, this redistricting has already been plagued by delay, as the Commission, "*through no fault of its own,*" was unable to meet the constitutionally established November 1 deadline.

*In re Indep Citizens Redistricting Comm*, 961 NW2d at 212. Through that deadline, the Michigan Constitution establishes an overriding directive that litigation over the plans be completed well in advance of the even-year election cycle, and an injunction and new round of redistricting at this time would contravene that directive.

Second, election deadlines are looming and would likely be frustrated by an injunction. The petition filing deadline for candidates is April 19, 2022. Def. App. 215a. The primary is scheduled by statute to occur on August 2, 2022. *Id.* The general election, established by federal law, is scheduled for November 8, 2022. *Id.* Election administrators need substantial lead time before those dates to administer redistricting plans, and an injunction would create a severe risk of an administrative meltdown, voter or candidate confusion, and voter disenfranchisement, possibly on a large scale.

Third, Plaintiffs are wrong that a remedial plan can be implemented "in a matter of hours." Br. 24. Even if a remedial *plan* can be fashioned promptly, the Commission is charged with enacting *legislation*. As an initial matter, this Court is constitutionally prohibited from implementing a remedial plan: "In no event shall any body, except the independent citizens redistricting commission acting pursuant to this section, promulgate and adopt a redistricting plan or plans for this state." Const 1963, art. 4, § 6(19). The Court "*shall* remand a plan to the commission for further action if the plan fails to comply with the requirements of this constitution, the constitution of the United States or superseding federal law." *Id.* (citation omitted). That unmistakable text rules out a court-drawn plan "in a matter of hours."

And redistricting on remand would be measured in months, not hours. The Commission's work is strictly governed by a series of procedural rules, beginning with public-hearing requirements, progressing through a 45-day public-comment period, and culminating in a vote of the Commission. Const 1963, art 4, § 6(9) & (14). Even if it were physically possible,

the Commission is legally prohibited from whipping up a plan in a few hours and imposing it on the public. To be sure, it remains unclear to what extent the Commission is bound to these deadlines in a remedial proceeding, and the Court should issue directives on the question in the event of a remand. But, in all events, it seems inconceivable that the Commission would be permitted to prepare remedial plans with *no public hearings or notice period*—which is what Plaintiffs' inexplicably demand.

Fourth, the Court should consider the public's overriding interest in voting in elections governed by plans established by the Commission. Even if the Court concludes—against all law and evidence—that the Commission's plan falls short under the VRA, this is a case where the perfect can become the enemy of the good. For example, if the Court orders a new redistricting, and a new set of hearing and comment periods lasting months, a federal court may conclude that the "state branches will fail timely to perform [the] duty" to redistrict and that federal intervention is essential to prepare plans compliant with the equal-population rule. See *Growe*, 507 US at 34. A federal court may thereby disregard the unmistakable intention of Michiganders that "[n]o other body shall . . . perform functions that are the same or similar to those granted to the commission." Const 1963, art 4, § 6(22). Worse still, a federal court could conclude that *no* redistricting can occur and that the 2022 elections should proceed under *last* decade's plans. See *Reynolds v Sims*, 377 US 533, 585; 84 S Ct 1362; 12 L Ed 2d 506 (1964). That could create the baffling outcome that, even after so many Michiganders worked so hard to end partisan redistricting in this state, the inaugural election in the redistricting-commission era would occur under a plan that is (1) malapportioned and (2) drawn by a partisan body. An even more baffling, but possible, outcome is an order commanding at-large congressional elections. See 2 USC 2a(c); *Branch v Smith*, 538 US 254, 275; 123 S Ct 1429; 155 L Ed 2d 407 (2003) (plurality opinion).

To be sure, the Commission would vehemently oppose any such outcome in a future federal proceeding. But the buck should stop here: it is Michigan's institutions that are responsible for the smooth and effective administration of Michigan elections. This Court should not create an excuse for federal institutions to intervene and seize that power for themselves. As shown, the Commission's VRA choices are supported by a wealth of evidence, Plaintiffs' claim is supported by practically none, and the harms of an injunction would far outweigh any conceivable benefit.

## CONCLUSION AND RELIEF REQUESTED

The Court should enter judgment in the Commission's favor and deny Plaintiffs' requested relief.

Dated: January 18, 2022

Respectfully submitted,

FINK BRESSACK

By: /s/ David H. Fink
David H. Fink (P28235)
Nathan J. Fink (P75185)
Philip D.W. Miller (P85277)
38500 Woodward Ave., Suite 350
Bloomfield Hills, Michigan 48304
(248) 971-2500
dfink@finkbressack.com
nfink@finkbressack.com
pmiller@finkbressack.com
*Counsel for Defendant*

BAKER & HOSTETLER LLP
Katherine L. McKnight (*PHV motion filed*)
Richard B. Raile (*PHV motion to be filed*)
1050 Connecticut Ave., NW, Suite 1100
Washington, D.C. 20036
(202) 861-1500
kmcknight@bakerlaw.com
rraile@bakerlaw.com

Patrick T. Lewis (*PHV motion filed*)
127 Public Square, Suite 2000
Cleveland, Ohio 44114
(216) 621-0200
plewis@bakerlaw.com
*Counsel for Defendant*

INDEPENDENT CITIZENS
REDISTRICTING COMMISSION
Julianne V. Pastula (P74739)
P.O. Box 511183
Livonia, Michigan 48151
(517) 331-6318
pastulaj1@michigan.gov
*General Counsel to the Commission*

## CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2022, I electronically filed the foregoing paper with the Clerk of the court using the MiFILE system and I used the MiFILE system to serve a copy on counsel for Plaintiffs.

FINK BRESSACK

By: /s/ Nathan J. Fink
Nathan J. Fink (P75185)
38500 Woodward Ave., Suite 350
Bloomfield Hills, MI 48304
Tel: (248) 971-2500
nfink@finkbressack.com

# STATE OF MICHIGAN
# IN THE SUPREME COURT

DETROIT CAUCUS; ROMULUS CITY COUNCIL;
INKSTER CITY COUNCIL; TENISHA YANCY, as a
State Representative and individually; SHERRY GAY
DAGNOGO, as a Former State Representative and
individually; TYRONE CARTER, as a State
Representative and individually; BETTY JEAN
ALEXANDER, as a State Senator and individually, Hon.
STEPHEN CHISHOLM, as member of Inkster City
Council and individually, TEOLA P. HUNTER, as a
Former State Representative and individually; Hon.
KEITH WILLIAMS, as Chair MDP Black Caucus and
individually; DR. CAROL WEAVER, as 14th
Congressional District Executive Board Member and
individually; WENDELL BYRD, as a Former State
Representative and individually; SHANELLE
JACKSON, as a Former State Representative and
individually; LAMAR LEMMONS, as a Former State
Representative and individually; IRMA CLARK
COLEMAN, as a Former Senator &Wayne County
Commissioner and individually; LAVONIA
PERRYMAN, as representative of the Shirley Chisholm
Metro Congress of Black Women and individually;
ALISHA BELL, as Wayne County Commissioner and
individually; NATALIE BIENAIME; OLIVER COLE;
ANDREA THOMPSON; DARRYL WOODS; NORMA
D. MCDANIEL, MELISSA D. MCDANIEL;
CHITARA WARREN; JAMES RICHARDSON; and
ELENA HERRADA,

MSC No. 163926

Original Jurisdiction
Const 1963, art. 4, § 6(19).

     Plaintiffs,

v.

INDEPENDENT CITIZENS REDISTRICTING
COMMISSION,

     Defendant.

---

## DEFENDANT INDEPENDENT CITIZENS REDISTRICTING COMMISSION'S
## APPENDIX

---

# TABLE OF CONTENTS

HOME        ABOUT US ▼        EVENTS        RESOURCES ▼        CONTACT ▼



Search the site        SEARCH

Home > Blog > Voters Not Politicians

# VOTERS NOT POLITICIANS

📅 November 29, 2017

Voters should choose their politicians, not the other way around.

On election day, we, the voters of Michigan, deserve to have our say. We expect our elections to be fair and transparent so that our votes matter and our voices are heard.

Politicians don't agree. They manipulate our voting maps to keep themselves in power. They draw voting maps that directly benefit themselves, instead of putting community interests and voter needs first. This allows politicians the power to choose their voters, instead of giving the voters the power to choose their politicians. This process gives us inattentive, ineffective, and unpopular representatives who keep getting re-elected over and over.

## CONNECT WITH US

✉  f  🐦  📷

🔗

**Mailing Address:**
Flint Neighborhoods United
3216 Martin Luther King
Avenue
Flint, MI 48505

## NEWSPAPER

**Def. App. 001a**

Voters Not Politicians is a ballot question committee working to bring the power back to the people of Michigan through a citizen led ballot initiative. With the help of other grassroots organizations, Voters Not Politician's vision is to establish an Independent Citizen Redistricting Commission through a state constitutional amendment.

TAKE ACTION!

Visit the Voters Not Politicians website to learn more and volunteer.

⊞ Click here for the newspaper archives.

## DISCLAIMER

Postings to this site do not necessarily reflect the opinions of Flint Neighborhoods United



## RELATED POSTS



NATIONAL KIDNEY FOUNDAT OF MICHIGAN



PRESS RELEASE: CITY OF FLINT



PRESS RELEASE: COMMUN FIRST PRESENTS

## UPCOMING EVENTS

**FEB 5 Sat** (https://www.flintneighborhoodsunited.org/events/action~oneday/exact_date~2-5-2022/)

9:30 am February FNU Meeting @ Online via Zoom (https://www.flintneighborhoodsunited.org/event/february-2022-fnu-meeting/?instance_id=255687)

**MAR 5 Sat** (https://www.flintneighborhoodsunited.org/events/action~oneday/exact_date~3-5-2022/)

9:30 am March FNU Meeting @ Online via Zoom (https://www.flintneighborhoodsunited.org/event/march-2022-fnu-meeting/?instance_id=255688)

**APR 2 Sat**

9:30 am April FNU Meeting @ Online via Zoom (https://www.flintnei

Def. App. 002a

**MICHIGAN**
**INDEPENDENT**
**CITIZENS**
**REDISTRICTING**
**COMMISSION**

## Resolution 2021.02.09

## Michigan Independent Citizens Redistricting Commission
## Contracting the Line Drawing and Technical Services Firm

### Presented: March 4, 2021

RESOLVED, that the Michigan Independent Citizens Redistricting Commission (MICRC), according to the Terms and Conditions set forth in RFP 920, 210000000714, extends the contract for Line Drawing and Technical Services to either Election Data Services or Haystaq DNA as the Commission's Line Drawing and Technical Services firm, contingent that should Election Data Services be selected, the services of Dr. Lisa Handley be included in the contract price as presented.
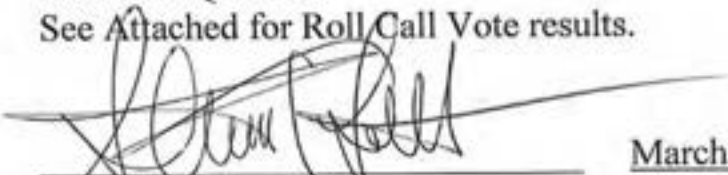
Attachment: *Proposals from Election Data Services and Haystaq DNA*

MOTION TO AMEND: NO

|  | Main | Amendment |
|---|---|---|
| Motion by Commissioner | Clark |  |
| Second by Commissioner | Lange |  |

RESULT: ROLL CALL VOTE WITH 8 COMMISSIONERS VOTING FOR ELECTION DATA SERVICES AND 5 COMMISSIONERS VOTING FOR HAYSTAQ DNA.
See Attached for Roll Call Vote results.

_____     March 4, 2021
Steven T. Lett, Chair

Def. App. 003a

**Resolution 2021.04.01**
**Michigan Independent Citizens Redistricting Commission**

**Extend Contract for VRA Legal Counsel**

**Presented: April 8, 2021**
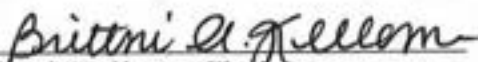
RESOLVED, that the Michigan Independent Citizens Redistricting Commission (MICRC) extends the contract for Voting Rights Act (VRA) Legal Counsel to Federal Compliance Consulting, LLC according to the Terms and Conditions set forth in RFP 920, 210000001155.

Attachment: *Proposal submitted by Fed Compliance Consulting, LLC* in response to RFP 920, 210000001155

MOTION TO AMEND: NO

|  | Main | Amendment |
|---|---|---|
| Motion by Commissioner | Lett |  |
| Second by Commissioner | Witjes |  |

RESULT: <u>APPROVED UNANIMOUSLY</u>
Roll Call Vote Attached

_Brittni A. Kellom_
Brittni Kellom, Chair

April 8, 2021
Date

also know that what the issues are for each jurisdiction. And that they are well positioned when the data come out to just get going.

>> Rebecca: Thank you. What challenges do you foresee for individuals serving in the role of the RA counsel during the redistricting cycle?

>> Bruce: I think it's like anything, I think it depends on how expert, how informed the Council is. This is not something that is -- this is something that I learned in law school. It's not something that I learned when I started practices in Gennessee county. This is something the department of justice taught me and I have learn now through three redistricting cycles. I think being aware of the attention on redistricting, that people are very interested in it. And they are all kinds of different players who like to weigh in and I know certainly in Arizona. Whether they were elected officials or other people, people came up to us, people came up to me all the time, Bruce, you know, you are looking at this district and this line. Is there any way we can move the district from here to here? Or from here to here?

So that's an issue that comes up regularly but as I said you know I understand the process. This is my third cycle. I've had the honor and benefit of working with the redistricting Commission in Arizona. Both as an enforcement attorney for the United States and also as an expert. And there is a consultant expert in litigation, so I understand what is involved, what the dynamics are. And then what the stresses can be.

>> Rebecca: Please describe your plan in the work product you will provide to the Commission.

>> Bruce: My plan which is the same really for all of my clients is in working with you if I'm fortunate enough to be retained about what are your priorities?
Let's talk about the big picture and the small picture. I know you have community meetings coming up.
And what will the focus be?
What are your priorities?
So the way I look at my role as an attorney is to in collaboration of course with you and act in accordance with your priorities and your preferences. So I mean, I think that that's when you talk about work product, the work product is really defined by not only the work that you request but also the types of analysis that we have to do. The if there are some big breaking Supreme Court decision or trial Court or appeals Court decision dealing with redistricting in your part of the country, then we are going to want to know about that.

So my work product is to provide the advice, counsel and analysis, work closely with you, staff, the mapping consultant, your general counsel in producing districting plan that is compliant and satisfies your criteria.

>> Rebecca: All right thank you. Please talk about a time when you had to communicate complicated legal terms whether VRA related or otherwise to public or

One of the highest risk factors especially youth to be put in that situation like you are. Notice all the time well, yeah, oh.

>> VICE CHAIR SZETELA: Thank you for addressing the Commission, Mr. Galant.

I would like to remind everybody to please go to our public comment tool and share your comments in writing including any specific areas of the map with which you are speaking. The public comment tool is available at www.Michigan.gov/MICRC.

This concludes our public comment for this afternoon.

I would like to mention that in addition to the in person and remote public comment all e-mailed and mailed public comment provided to the Commission before each meeting and the Commissioners also review the public comment portal at www.Michigan.gov/MICRC on a regular basis.

We appreciate everybody who provides us with comment in whatever way they choose to do so. And we invite everyone to continue sharing their thoughts, comments and maps with us. Thank you very much.

I will pass it over to our Chair to continue with our agenda.

>> CHAIR KELLOM: Thank you so much, Vice Chair Szetela.

Commissioners, we and for those attending and listening, we are moving forward to new business, Item 6A racially polarized voting analysis with Dr. Lisa Handley along with VRA and state Constitution commentary from Mr. Bruce Adelson, Federal Compliance Consulting.

Without objection, I will ask Dr. Handley to begin.

Hearing none, Dr. Handley, please proceed and hello.

>> DR. LISA HANDLEY: It would be good if I started with the microphone.

Hello again.

It's a pleasure to be here in Ann Arbor with the Commission.

I'm trying to figure out how to do this.

Okay, okay, can everybody see the screen and hear me? Have I figured out how to do this? Okay now have we got it. Okay.

>> MS. SARAH REINHARDT: While we are waiting, I wanted to note for the record that Commissioner Wagner has turned off her video, but she is still present.

Thank you.

>> DR. LISA HANDLEY: It's a pleasure to be here again.

It looks like I've got everything running.

I'm going to start with a little refresher course about why I did the analysis and what -- before I get to what the results were.

Geez.

How do I go down? Okay, the Voting Rights Act is very important in this District drawing process.

I pulled up the redistricting criteria priority pyramid and you will see it's number two in the pyramid.

The first and Foremost criteria are the U.S. Constitution and Federal law and the Voting Rights Act is Federal law.

And it applies everywhere in the country including Michigan.

It prohibits any voting standard practice or procedure including a redistricting plan that results in the denial or dilution of minority voting strength.

A redistricting plan that dilutes minority voting strength is one that either cracks or packs a geographically concentrated minority group.

A top example to the left is or to the right is an example of a District, a set of districts that cracks the minority community by dividing it among four districts, five districts so that they cannot elect a minority preferred candidate in any of those districts.

The lower example on the right is an example of a District or District center that packs minority voters so that they have an impact on only one District and no impact on any of the other districts despite the fact that you could probably have drawn two districts in which they had the ability to elect communities, to elect candidates of choice.

When the Voting Rights Act was amended in 1982 to make it clear that you did not have to show that the redirectors intended to discriminate only that the plan that they drew actually resulted in discrimination.

The Supreme Court first considered this case in 1986 in a case called Thornburg versus Jingles and had to prove three conditions in order to satisfy Section Two and get a District drawn in which they could have the ability to elect a candidate of choice.

First is that the group must be sufficiently large and geographically compact to form a majority in a single member District.

This is in essence so there was actually a remedy available.

There is a solution to the problem of how do we elect candidates of choice.

The second is that the minority group must be politically cohesive.

That is, they must vote for the same candidates.

And, third, whites must vote as a bloc to usually defeat the minority-preferred candidates.

If they were not voting as a bloc to defeat these candidates, these candidates would win, and you wouldn't need to draw a minority District.

So how do we know how the minority group is voting? How do we know how whites are voting? What you do is conduct a racial bloc voting analysis.

And my job in this particular situation is to actually carry out what's called a racial bloc voting analysis that is analyze voting patterns by race to determine if voting is polarized. If whites are voting against a cohesive minority community.

I mentioned that first of all we have, of course, a secret ballot.

We don't know the race of the voters when they cast the ballot.

So, we have to use estimation techniques.

And the two most standard estimation techniques are ecological regression analysis and ecological inference analysis. Ecological simply means you are using aggregate data.

What we are going to do is we are going to look at precincts rather than individuals. And we are going to look to see if there are patterns across the precincts in which the demographic composition of the precinct is related to the voting patterns of those precincts.

So, on the left we see ecological regression each precinct in the jurisdiction has been placed on the scatter plot on the basis of the percent Black turnout this is the jurisdiction in the south where we actually know turn out by race.

And the vertical axis is vote for Warnock this is an election that occurred in January of 2021 it's the race for U.S. Senate in Georgia.

This is real data in a specific County.

You can see a pattern here and the pattern is the higher the percent Black across the precincts the more votes you see for Warnock that is the estimation technique we used to determine how whites and Blacks are voting in this particular jurisdiction.

This practice, this particular technique had one disadvantage associated with it and that voting was very polarized, you would get estimates that were outside the logical pounds and would find something like 105 Blacks vote 105% of Black voters voted for Warnock. And negative 5 white voters voted for Warnock.

So, in the 1990s Professor King developed ecological inference, that you see on the right side. And this process, each precinct is actually represented by a line rather than a point using more information about the precinct to get this line. And that is all the possible combinations of Black and white votes that could have produced the result for that particular precinct as represented by a line as opposed to a point.

And then the computer generates a best guesstimate of what the actual composition of the votes for the Black candidate were, was.

So, this is the analysis that I performed in Michigan.

Now you need a few pieces of information in order to perform this.

And that is that you need to have an area that has a sufficient number of minority voters to actually estimate voting behavior by race.

I looked at eight counties.

There were several counties in the west of Michigan that had growing minority population around Grand Rapids, Muskegon County and Kent County and it turns out there was not a sufficient number of minority votes to estimate behavior voting behavior on the basis of race in those two counties.

The same is true of I looked at six counties in the east.

I was able to produce estimates for Wayne, Oakland, Genesee and Saginaw Counties, I was not able to do so for Washtenaw and Macomb Counties there was not a sufficient amount of Black turn out to estimate Black and white behavior in those two counties so

what I'm going to give you is the results of analysis for statewide for the entire State of Michigan and for these four counties.

Because actually what you want to do you want to do an area specific analysis because it turns out that voting patterns are different depending where you are in the state.

For example, it may be the case using the example I gave you before of the Georgia election.

Turns out that in the rule areas of Georgia the election was very polarized while in the urban area around Fulton it was much less polarized.

In fact, it wasn't polarized at all in certain areas.

So, it matters where you are in the state as to how much polarization there is and when you're drawing districts it matters what it looks like in that specific area.

The Court is quite adamant about doing a District-specific and am analysis and this is why I looked at these counties.

I looked at 13 elections there have been 13 statewide and Federal elections over the decade.

These include U.S. Senate, U.S. president, U.S. Senate, and three statewide contests, the gubernatorial contests the Attorney General and Secretary of State and the treasurer.

Four statewide contests.

Now the courts have indicated that the most probative contest to look at are contests include minority candidates.

So, you've had four contests statewide contests over the last decade that included minority candidates.

These are the most probative.

You have also listed them here.

You had the 2012 race for U.S. president.

You had a 2014 Secretary of State contest.

You had the 2018 and 2020 U.S. Senate contests.

Then you had two contests that included minority candidates as running mates.

This is the 2018 gubernatorial contest and the 2020 Presidential contest.

So, these I looked at all 13 statewide contests, but these are the most probative according to the courts.

Ordinarily I would look at statewide democratic primaries as well.

I could not look at republican primaries there is not enough minority participation in republican primaries to actually analyze voting patterns by race.

So, I look at democratic primaries.

And in this case, you've only had one statewide democratic primary.

This entire decade and that was in 2018 for Governor.

So, I looked at that contest as well.

This is what the results look like.

And I'm going to explain how to read this table.

Every election that I looked at for every area has a table that looks like this.

So, this is statewide.

This is the election listed here, 2018 Governor.

And here are the candidates.

Here are the parties of the candidates.

Here are the races of the candidates.

Here is the votes that they received statewide.

Now, there are actually four estimates for Black voters and there are four estimates for white voters.

I talked to you about ecological regression and mentioned the problem you have with ecological regression and there sit 104 of Black voters supporting Whitmer.

I didn't mention homogenous precinct.

This is actual these are the actual results of precincts across the state that are overwhelmingly one race.

So these are precincts across the state that are 90% or more voting age population Black in composition.

So that's how I derived the homogenous and this is actual data so looking at 90% plus precincts 90 per sent plus Black age population precincts 95.6% of those voters supported Whitmer.

There are actually two different forms of ecological inference analysis.

One is called two by two.

And that is the one that was developed in the 1990s.

It's since been refined so that I can account for differential turn out and that's what is in the last column 95.3%.

Now all of these are derived from different techniques.

You wouldn't expect them to be exactly the same, but they are all telling a very similar story and that is overwhelming Black support for Whitmer.

On the other side of this table, we will get our estimates.

I report the estimates for the white voters.

So let me see if I can get this to work.

But it's not doing this.

Okay, so we've got 41.1% in the overwhelmingly white precincts, 41.1% of the voters supported Whitmer.

The AR estimate is 38.9.

The two by two is 40.6.

And let me see and the C is 44.8% so these are estimates.

Now I forgot to mention down here the votes for office this is the percentage of voting age population that actually turned out and cast a ballot for that particular office.

So, you can see there is a difference in turn out rates.

And that is around 35% of Black voting age population turned out and cast a ballot for the Governor in 2018.

While the number was higher almost double for white voters.

This contest is racially polarized.

If Blacks voting alone had voted alone Whitmer would have been elected.

She was.

And then of course if whites voted alone, it would have been the republican candidate who was elected.

Below I have the primary for this election.

I have the gubernatorial primary of 2018.

We have the three candidates listed here.

We have they are all democrats.

We have their race.

We have the percentage of votes they received.

And you will see that this contest is also polarized.

This contest you have a plurality of the Black voters supporting Thanedar and majority of the white voters supported Whitmer.

So, this contest is also polarized.

Okay, now I did this, and you will see tables in the report that I eventually produce for every election but I'm going to show you summaries of this in a little bit.

So, over all statewide in the 13 elections that I looked at, 12 were polarized.

And those elections that are most probative to the courts, that is those that included minority candidates, 6 out of the 6 were polarized in the democratic primary which there was only one it was polarized.

And I money -- mentioned I looked at four counties and these are the results of the analysis in four counties in Genesee County we have nine of the 13 contests polarized with five of the six with minority candidates.

The democratic primary was polarized.

And Saginaw it's 11 out of 13 of the contests, six out of six of those contests with minority candidates.

And the democratic primary was polarized.

In Oakland all 13 of the general elections were polarized including the six with minority candidates but the democratic primary was not.

And finally in Wayne County where voting is less polarized you will see that 7 of the 13 contests were polarized, three of those were minority candidates and the democratic primary was polarized.

What this tells me is that voting is polarized in Michigan.

And what that means is the Voting Rights Act comes into may in districts that provide minority voters with the opportunity to elect their candidates must be drawn.

Okay, so voting is polarized.

You have to create districts if they can be created, but more importantly perhaps is that those districts that exist must be maintained.

It's important to continue to provide minority voters with the opportunity to elect their candidates of choice.

So, if districts can be drawn, they should be drawn.

If districts exist and minority candidates are winning only because the districts exist, those districts must be maintained.

Those districts must be maintained in a way that gives minorities an opportunity to elect their candidates of choice.

But you don't just choose an arbitrary target.

You don't just say 50% voting age population is what we need to maintain these minority districts.

And it is the Supreme Court that has told us this, and Bruce gets to talk about this later. But the fact is you have to do a District specific functional analysis in each area that you are to determine what an effective minority District looks like.

No arbitrary percentages.

So how do we do a District-specific functional analysis? By functional we mean we have to look at actual voting behavior and look at election results.

By District specific I told you already we are going to look first at voting patterns not just statewide but District or broader areas like counties.

Now the first approach I'm going to discuss with you today, and that is taking the estimates of participation rates minority cohesion and white cross over from the RV B analysis I conducted and using that to calculate the percent minority population needed in a specific area for the minority preferred candidates to win a District in that area.

But there's another approach that you can use that the Commissioners can use as they're drawing and that is to look at the election results of what I call bellwether elections to determine if that election had occurred within the proposed boundaries of the districts that you're creating if those minority preferred candidates would have carried those districts.

There are four bellwether contests in particular that you are going to focus on.

You will recall I said six contests include minority candidates and two of those contests the minority candidate was not the candidate preferred by minority voters.

That was in 2018 Senate and the 2020 Senate.

That was the republican John James.

So, the four bellwether contests you will be focusing on to determine if the districts you have drawn will allow minorities to elect candidates of choice will be the other four contests the 2012 presidents contest for president, the 2014 contest for treasurer, the 2018 gubernatorial contest and the 2020 Presidential contest.

And you can recompile election results and determine if the minority preferred candidates would carry the districts.

Now, I'm going to back and spend the rest of the time talking about the first approach. So, this table above takes what I mentioned, that is the participation rates, the degree of minority cohesion and the degree of white cross over vote for the minority preferred candidate.

And tells you how that majority preferred candidate would do in each of these in a 55% District, 50, 45, 40 and 35% Black voting age population District.

This is how this works.

This is Algebra.

Took me about a day to work out the formula and how to do it in excel but it's actually just Algebra.

What I did here is I'm going to you will remember this chart from earlier.

I'm going to take the participation rate and I'm going to use in this instance the best estimate, and that is the EI estimate that takes into account differential turn out.

So, I'm going to take 35.2% and it's going to go into this column.

That is votes cast for office.

This keeps disappearing.

This is the percentage of votes by Black voters for the minority preferred candidate.

I got that from this table.

This is the numbers, this is just 100 minus 95.3%.

This is the votes cast, votes cast by office by whites, and you will see that is up here.

Then percentage of votes for Whitmer here.

Numbers directed here.

And then a lot of Algebra to tell me what this candidate would have gotten in a District that was 55 percent.

Whitmer would have gotten 65.2 percent of the vote.

In a District that was 50% she would have gotten 62.8% of the vote.

In a District that was 45% she would have gotten 60.6.

And in a District that was 40% she would have gotten 58.5.

And in a District that was 35% she would have gotten 56.4%.

This is an important piece of information.

I want you to notice that when I go down, say the 40% Black voting age population column, the Black preferred candidate wins every contest.

This tells me that statewide it's quite possible that you do not need a majority-minority District to elect a minority preferred candidate.

Now these numbers are statewide and it's more important that we look at each County individually because as I mentioned earlier, it may be the case that numbers change depending on where you are.

So here is Saginaw County.

Same thing that the numbers come from the same place, from the racial bloc voting analysis.

Here in Saginaw County well we are not going to go down to 35% because the minority preferred candidate does not win some of these contests.

So, this is a little bit different than statewide.

Saginaw County the District is probably going to have to have a higher Black voting age population than it would be the case statewide and then it will be the case you will see in other counties.

Here is Genesee County.

Voting is a little less polarized.

We are getting more white cross over vote.

Here are the votes what we call white cross over votes is white vote for the minority preferred candidate.

And we are getting more and this is why 35% District looks like it would be effective in Genesee County.

In Oakland County, 35% is going to work.

40 percent looks like it might work.

In Wayne County where we have a lot more white crossover vote 35% might well work.

I'm not advocating that you draw the districts at this amount.

I'm advocating that you keep in mind that the districts do not have to be majority-minority in composition and then you turn to the recompiled election results for what you have in any given District because it matters not only how much the area that you're drawing how high the Black participation rates are, but how much white cross over voting you might get.

So, you're going to look at each individual District as you draw it looking at the bellwether elections to make certain that the minority preferred candidates would win.

Now, I recognize that you might be surprised that despite what is a very polarized state that a District that is not majority-minority may be all that is necessary to provide minorities with an opportunity to elect their candidates of choice.

But what I want to show you now is what are called the threshold of representation.

In the Senate there are no districts between 36 and 45%.

But every District over 48% elects a Black candidate to office and because I've done a racial bloc voting analysis on the general elections for the Senate, I can tell you these are all minority preferred candidates.

You can see that 67% of the districts over 35% elect Black preferred, Black candidates to office.

The difference is even more striking in the threshold of representation in the State House.

Every District over 35 over 36% Black and voting age population elects minority candidates to office.

And, in fact, 89% of those over 25% Black elect minority candidates to office.

And again, there are no House Districts between 37 and 48% Black.

Even though many of those would have been effective districts.

This last slide before I turn it over to Bruce is a maps of the State House and the State Senate districts because I wondered why there weren't any 35-45% Black districts and what the shapes of the districts were that were electing Blacks to office.

And I will tell you that there are some, let's see if I can go back, there are some very hacked Black districts.

We have some districts that I could not produce estimates of white voting behavior because there were virtually no whites voting in these districts.

We have State House Districts that are well -- we have three of them that are well over 90%.

And the Black preferred candidates are getting well over 90% of the vote.

Those are packed.

Doesn't like me going back.

Okay.

.

And those are not necessarily shaped districts.

It was not like they were creating districts that were nice little compact districts.

>> CHAIR KELLOM: Doctor Handley we have a question from Commissioner Lange.

>> DR. LISA HANDLEY: Yes.

>> COMMISSIONER LANGE: Dr. Handley I'm sorry to interrupt your presentation. I just have a quick question.

When doing the racial bloc voting, is it only based off from African/American votes or is it based off from any other ethnicities?

>> DR. LISA HANDLEY: That is a good question, and I should have said that earlier on now and many jurisdictions of course you would look at other ethnicities and I would have liked to have done so in Michigan.

But it turns out there are no counties with the sufficient number of Hispanics or Asian Americans or Native Americans to do the analysis.

But, yes, typically you could and should do the analysis if there was a sufficient number of minorities to do the analysis.

>> CHAIR KELLOM: Commissioner Lange does that satisfy your question?

>> COMMISSIONER LANGE: Yes, thank you very much.

>> CHAIR KELLOM: Dr. Handley you have another question from Commissioner Rothhorn?

>> COMMISSIONER ROTHHORN: Dr. Handley I'm thinking about the census data and how we have a significant population of Arab Americans in Dearborn so following up on what Dr. Or excuse me what Commissioner Lange was saying do we have any or is there any way to understand the Arab American or the Mena vote in this analysis?

>> DR. LISA HANDLEY: There is not because we don't have the composition of the precincts.

# DETERMINING IF A REDISTRICTING PLAN COMPLIES WITH THE VOTING RIGHTS ACT

Dr. Lisa Handley

# Redistricting Criteria Priority Pyramid: Voting Rights Act of 1965

- U.S. Constitution: equal population
- Voting Rights Act of 1965
- Contiguity
- Communities of interest
- No disproportionate advantage to any political party
- No favoring or disfavoring incumbents or candidates
- Consideration of county, city, township boundaries
- Reasonable compactness

- Section 2 prohibits any voting standard, practice or procedure, including a redistricting plan, that results in the denial or dilution of minority voting strength.

- All state and local jurisdictions are covered by Section 2 of the Voting Rights Act.

# Redistricting Plans that Violate the Voting Rights Act

Redistricting plans cannot:

- crack, or
- pack

a geographically concentrated minority community across districts or within a district in a manner that dilutes their voting strength.



35%
35%
35%
35%
35%
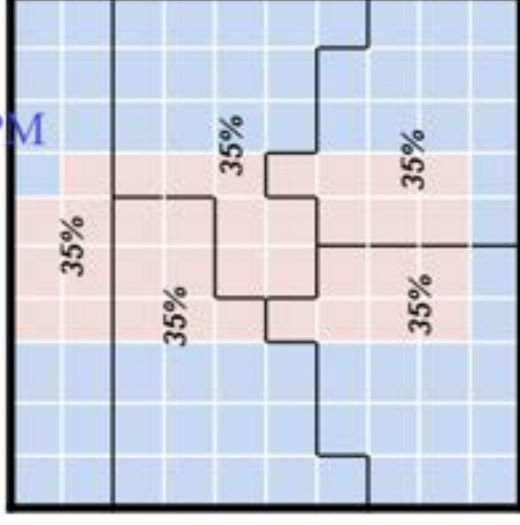
Plan that cracks minority community across 5 districts



20%
15%
100%
20%
20%
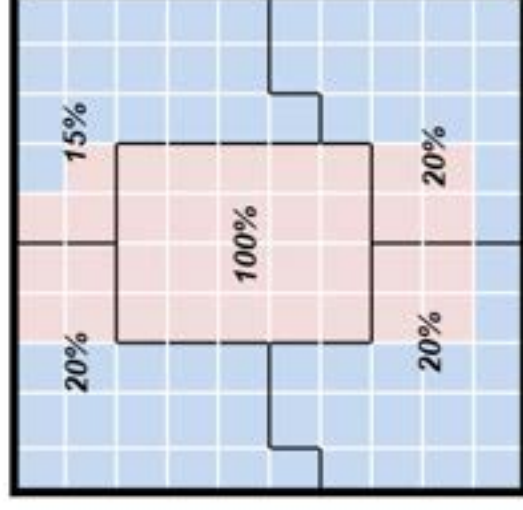
Plan that packs minority community into single district

Def. App. 018a

# *Thornburg v. Gingles*: Three-Pronged Test

U.S. Supreme Court held that plaintiffs must satisfy three preconditions to qualify for relief under Section 2 of the Voting Rights Act:

- The minority group must be sufficiently large and geographically compact to form a majority in a single-member district
- The minority group must be politically cohesive
- Whites must vote as a bloc to usually defeat the minority-preferred candidates

A racial bloc voting analysis is used to ascertain whether minority voters are politically cohesive and if white voters bloc vote to usually defeat minority-preferred candidates.

Def. App. 019a

# Analyzing Voting Behavior by Race

Two standard statistical techniques for estimating voting patterns of minority and white voters:

- Ecological regression analysis (ER)
- Ecological inference analysis (EI)



Def. App. 020a

Area-Specific Analyses

- Wayne
- Oakland
- Genesee
- Saginaw
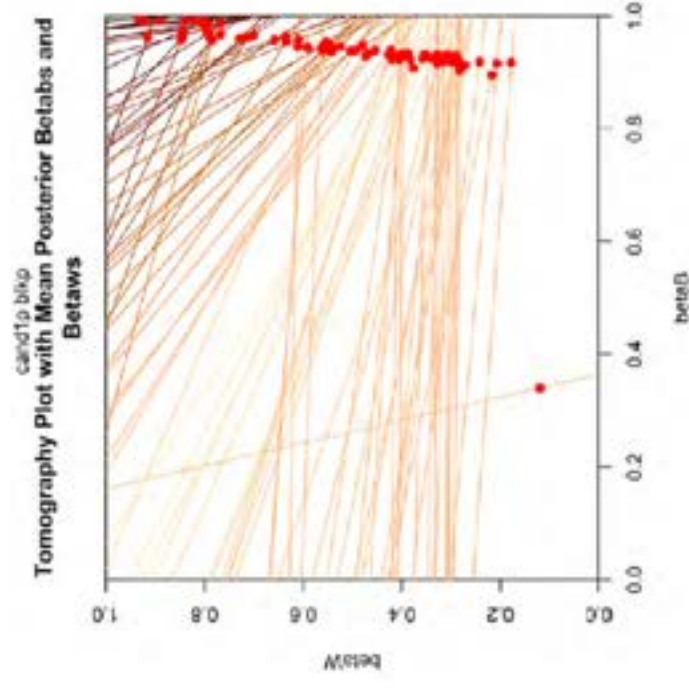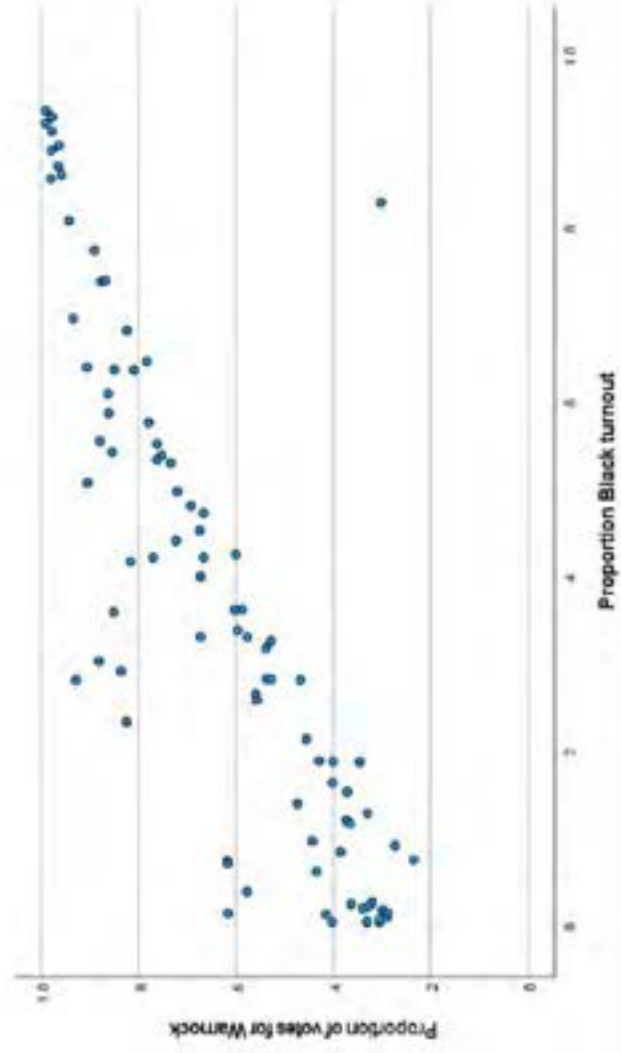
State of Michigan - Non-Hispanic Black Population (2020 Census PL)

Percent Black by Block Group
Statewide: 13.5%

% Non-Hispanic Black
0% - 5%
5.1% - 25%
25.1% - 50%
50.1% - 75%
75.1% - 100%

Metro Detroit Townships

Def. App. 021a

Election Data Services

30:25 PM

# Elections Analyzed to Date

- All federal and statewide general election contests, 2012-2020.

  - Four election contests included minority candidates:
    - 2012 U.S. President (Barack Obama)
    - 2014 Secretary of State (Godfrey Dillard)
    - 2018 U.S. Senate (John James)
    - 2020 U.S. Senate (John James)

  - Two contests included minority candidates as running mates
    - 2018 Governor (Gretchen Whitmer/Garlin Gilchrist)
    - 2020 U.S. President (Joseph Biden/Kamala Harris)

- Only Democratic primary for statewide office this past decade: 2018 race for governor

Def. App. 022a

# Example of RBV Results: 2018 General and Democratic Primary for Governor

| Statewide | | | | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Party | Race | Vote | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **2018 General** | | | | | | | | | | | |
| **Governor** | | | | | | | | | | | |
| Whitmer/Gilchrist | D | W/AA | 53.3% | 95.6 | 104.3 | 98.6 | 95.3 | 41.1 | 38.9 | 40.6 | 44.8 |
| Schuette/Lyons | R | W | 43.8% | 2.5 | -6.4 | 0.6 | 1.8 | 56.0 | 57.9 | 56.2 | 52.8 |
| others | | | | 1.9 | 2.1 | 2.6 | 2.9 | 2.9 | 3.2 | 2.9 | 2.5 |
| *votes for office* | | | | *36.6* | *31.6* | *35.2* | *35.2* | *61.9* | *61.7* | *63.3* | *63.3* |

| 2018 Democratic Primary for Governor | | | | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Party | Race | Vote | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **STATEWIDE** | | | | | | | | | | | |
| Abdul El-Sayed | D | ME | 30.2% | 21.0 | 24.2 | 23.5 | 26.0 | 25.7 | 27.1 | 30.2 | 28.5 |
| Shri Thanedar | D | A | 17.7% | 42.5 | 44.2 | 42.2 | 39.0 | 15.8 | 12.9 | 10.8 | 9.4 |
| Gretchen Whitmer | D | W | 52.0% | 36.5 | 31.6 | 33.5 | 35.0 | 58.6 | 60.0 | 59.4 | 62.0 |
| *votes for office* | | | | *23.0* | *22.5* | *24.5* | *24.5* | *13.9* | *12.0* | *14.0* | *14.0* |

- *votes for office* = percentage of voting age population who turned out and cast a vote for the office
- HP = vote percentages from homogeneous precincts
- ER = estimates derived from ecological regression analysis
- EI 2x2 = estimates derived from standard EI (as developed by Prof. Gary King)
- EI RxC = estimates derived from EI technique that takes into account differences in participation by race

Def. App. 023a

# Number of Racially Polarized Elections

| | General Elections with Minority Candidates | All Statewide General Election Contests | Statewide Democratic Primary |
|---|---|---|---|
| Statewide | 6/6 | 12/13 | 1/1 |
| Genesee | 5/6 | 9/13 | 1/1 |
| Saginaw | 6/6 | 11/13 | 1/1 |
| Oakland | 6/6 | 13/13 | 0/1 |
| Wayne | 3/6 | 7/13 | 1/1 |

Number of polarized contests / total number of contests

# Complying with the Voting Rights Act

- If, based on the racial bloc voting (RBV) analysis, it is determined voting is racially polarized, and candidates preferred by a politically cohesive minority group are usually defeated by white voters not supporting these candidates, a district(s) that offers minority voters an opportunity to elect their candidates of choice must be drawn.

- If such districts already exist, and minority-preferred candidates are winning only because these districts exist, then these minority districts must be maintained in a manner that continues to provide minority voters with an opportunity to elect their preferred candidates.

Def. App. 025a

# Drawing Minority Opportunity Districts

- Line drawers cannot simply set an arbitrary demographic target (e.g., 50% black voting age population) for all minority districts across the jurisdiction (*Alabama Legislative Black Caucus v. Alabama*, 2015).

- A district-specific, functional analysis is required to determine if a proposed district will provide minority voters with the ability to elect minority-preferred candidates to office.

# District-specific, Function Approaches

- Estimates of participation rates, minority cohesion and white crossover voting for minority-preferred candidates derived from the RBV analysis can be used to calculate the percent minority population needed in a specific area for minority-preferred candidates to win a district in that area.

- Election results from previous contests that included minority-preferred candidates ("bellwether elections" as identified by the RBV analysis) can be recompiled to reflect the boundaries of the proposed district to determine if minority-preferred candidates would consistently carry this proposed district.

Def. App. 027a

30:25 PM

## Michigan STATEWIDE Percent Black VAP needed to win

turnout rate for office and percent vote for black-preferred candidates

| GENERAL ELECTIONS | race of B-P candidate | Black votes — votes cast for office | Black votes — B-P | Black votes — all others | White votes — votes cast for office | White votes — B-P | White votes — all others | percent of vote B-P cand would have received if district was 55% black VAP | percent of vote B-P cand would have received if district was 50% black VAP | percent of vote B-P cand would have received if district was 45% black VAP | percent of vote B-P cand would have received if district was 40% black VAP | percent of vote B-P cand would have received if district was 35% black VAP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 2020 President | W | 55.2 | 96.2 | 3.8 | 79.0 | 40.0 | 60.0 | 65.9 | 63.1 | 60.4 | 57.9 | 55.4 |
| 2020 US Senate | W | 55.0 | 93.9 | 6.1 | 78.1 | 39.4 | 60.6 | 64.6 | 61.9 | 59.3 | 56.8 | 54.4 |
| 2018 Governor | W | 35.2 | 95.3 | 4.7 | 63.3 | 44.8 | 55.2 | 65.2 | 62.8 | 60.6 | 58.5 | 56.4 |
| 2018 Secretary of State | W | 35.1 | 95.6 | 4.4 | 62.2 | 43.9 | 56.1 | 65.0 | 62.6 | 60.2 | 58.0 | 55.9 |
| 2018 Attorney General | W | 34.6 | 94.4 | 5.6 | 61.7 | 39.4 | 60.6 | 61.8 | 59.2 | 56.7 | 54.4 | 52.2 |
| 2018 US Senate | W | 35.0 | 94.3 | 5.7 | 63.1 | 43.7 | 56.3 | 64.1 | 61.8 | 59.5 | 57.4 | 55.3 |
| 2016 President | W | 54.1 | 97.3 | 2.7 | 67.2 | 34.3 | 65.7 | 65.5 | 62.4 | 59.3 | 56.3 | 53.4 |
| 2014 Governor | W | 35.1 | 95.7 | 4.3 | 49.1 | 38.5 | 61.5 | 65.2 | 62.3 | 59.6 | 57.0 | 54.4 |
| 2014 Secretary of State | AA | 34.8 | 95.8 | 4.2 | 47.8 | 33.5 | 66.5 | 62.8 | 59.7 | 56.8 | 53.9 | 51.0 |
| 2014 Attorney General | W | 34.6 | 95.2 | 4.8 | 47.8 | 35.0 | 65.0 | 63.3 | 60.3 | 57.4 | 54.6 | 51.9 |
| 2014 US Senate | W | 35.0 | 96.5 | 3.5 | 48.5 | 47.3 | 52.7 | 70.4 | 67.9 | 65.6 | 63.3 | 61.1 |
| 2012 President | AA | 59.1 | 97.8 | 2.2 | 68.1 | 44.5 | 55.5 | 71.9 | 69.3 | 66.6 | 64.0 | 61.5 |
| 2012 US Senate | W | 58.8 | 96.8 | 3.2 | 66.9 | 50.6 | 49.4 | 74.5 | 72.2 | 69.9 | 67.7 | 65.4 |

### Statewide

| 2018 General | Party | Race | Vote | Estimates for Black Voters — HP | ER | EI 2x2 | EI RxC | Estimates for White Voters — HP | ER | EI 2x2 | EI RxC |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Governor | | | | | | | | | | | |
| Whitmer/Gilchrist | D | W/AA | 53.3% | 95.6 | 104.3 | 98.6 | 95.3 | 41.1 | 38.9 | 40.6 | 44.8 |
| Schuette/Lyons | R | W | 43.8% | 2.5 | -6.4 | 0.6 | 1.8 | 56.0 | 57.9 | 56.2 | 52.8 |
| others | | | | 2.6 | 3.6 | 2.6 | 2.9 | 2.9 | 3.2 | 2.9 | 2.5 |
| votes for office | | | | 36.6 | 31.6 | 35.2 | 35.2 | 61.9 | 61.7 | 63.3 | 63.3 |

Def. App. 028a

| SAGINAW COUNTY Percent Black VAP needed to win | race of B-P candidate | turnout rate for office and percent vote for black-preferred candidates | | | | | | percent of vote B-P cand would have received if district was 55% black VAP | percent of vote B-P cand would have received if district was 50% black VAP | percent of vote B-P cand would have received if district was 45% black VAP | percent of vote B-P cand would have received if district was 40% black VAP | percent of vote B-P cand would have received if district was 35% black VAP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Black votes | | | White votes | | | | | | | |
| | | votes cast for office | B-P | all others | votes cast for office | B-P | all others | | | | | |
| **GENERAL ELECTIONS** | | | | | | | | | | | | |
| 2020 President | W | 48.6 | 95.3 | 4.7 | 79.6 | 36.3 | 63.7 | 61.5 | 58.7 | 56.0 | 53.4 | 50.9 |
| 2020 US Senate | W | 48.4 | 93.8 | 6.2 | 78.7 | 37.5 | 62.5 | 61.7 | 58.9 | 56.3 | 53.9 | 51.5 |
| 2018 Governor | W | 37.7 | 93.6 | 6.4 | 63.0 | 40.9 | 59.1 | 63.2 | 60.6 | 58.2 | 55.9 | 53.7 |
| 2018 Secretary of State | W | 38.0 | 93.7 | 6.3 | 61.4 | 39.2 | 60.8 | 62.7 | 60.0 | 57.5 | 55.1 | 52.8 |
| 2018 Attorney General | W | 37.6 | 93.4 | 6.6 | 61.0 | 33.3 | 66.7 | 59.1 | 56.2 | 53.4 | 50.8 | 48.3 |
| 2018 US Senate | W | 37.8 | 93.5 | 6.5 | 62.8 | 39.3 | 60.7 | 62.3 | 59.7 | 57.2 | 54.8 | 52.6 |
| 2016 President | W | 52.3 | 95.0 | 5.0 | 70.2 | 30.6 | 69.4 | 61.3 | 58.1 | 55.0 | 52.0 | 49.0 |
| 2014 Governor | W | 32.7 | 94.1 | 5.9 | 50.8 | 42.2 | 57.8 | 65.1 | 62.5 | 60.1 | 57.8 | 55.6 |
| 2014 Secretary of State | AA | 32.6 | 94.4 | 5.6 | 49.2 | 36.3 | 63.7 | 62.3 | 59.5 | 56.7 | 54.1 | 51.6 |
| 2014 Attorney General | W | 32.4 | 94.1 | 5.9 | 50.1 | 32.6 | 67.4 | 59.8 | 56.8 | 53.9 | 51.1 | 48.5 |
| 2014 US Senate | W | 32.7 | 94.1 | 5.9 | 50.1 | 50.6 | 49.4 | 69.9 | 67.8 | 65.7 | 63.8 | 61.9 |
| 2012 President | AA | 56.2 | 95.7 | 4.3 | 70.3 | 42.9 | 57.1 | 69.0 | 66.4 | 63.8 | 61.3 | 58.8 |
| 2012 US Senate | W | 55.7 | 95.4 | 4.6 | 68.7 | 52.3 | 47.7 | 73.8 | 71.6 | 69.5 | 67.4 | 65.4 |

Def. App. 029a

| GENESEE COUNTY Percent Black VAP needed to win | race of B-P candidate | turnout rate for office and percent vote for black-preferred candidates | | | | | | percent of vote B-P cand would have received if district was 55% black VAP | percent of vote B-P cand would have received if district was 50% black VAP | percent of vote B-P cand would have received if district was 45% black VAP | percent of vote B-P cand would have received if district was 40% black VAP | percent of vote B-P cand would have received if district was 35% black VAP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Black votes | | | White votes | | | | | | | |
| | | votes cast for office | B-P | all others | votes cast for office | B-P | all others | | | | | |
| GENERAL ELECTIONS | | | | | | | | | | | | |
| 2020 President | W | 53.0 | 96.1 | 3.9 | 79.6 | 42.1 | 57.9 | 66.3 | 63.7 | 61.1 | 58.7 | 56.4 |
| 2020 US Senate | W | 56.6 | 95.0 | 5.0 | 78.7 | 43.5 | 56.5 | 67.6 | 65.0 | 62.6 | 60.2 | 57.9 |
| 2018 Governor | W | 45.1 | 95.3 | 4.7 | 59.8 | 46.2 | 53.8 | 69.8 | 67.3 | 64.9 | 62.6 | 60.4 |
| 2018 Secretary of State | W | 44.9 | 95.2 | 4.8 | 58.6 | 48.0 | 52.0 | 70.8 | 68.5 | 66.2 | 64.0 | 61.8 |
| 2018 Attorney General | W | 44.6 | 94.1 | 5.9 | 58.4 | 41.1 | 58.9 | 66.7 | 64.0 | 61.5 | 59.0 | 56.5 |
| 2018 US Senate | W | 45.1 | 95.2 | 4.8 | 59.6 | 45.8 | 54.2 | 69.5 | 67.1 | 64.7 | 62.4 | 60.1 |
| 2016 President | W | 59.0 | 96.4 | 3.6 | 67.3 | 37.4 | 62.6 | 67.9 | 65.0 | 62.0 | 59.2 | 56.3 |
| 2014 Governor | W | 35.8 | 95.8 | 4.2 | 47.5 | 51.8 | 48.2 | 72.9 | 70.7 | 68.6 | 66.5 | 64.5 |
| 2014 Secretary of State | AA | 35.9 | 95.6 | 4.4 | 46.1 | 46.2 | 53.8 | 70.3 | 67.8 | 65.4 | 63.1 | 60.8 |
| 2014 Attorney General | W | 35.9 | 95.6 | 4.4 | 45.5 | 45.2 | 54.8 | 69.9 | 67.4 | 65.0 | 62.6 | 60.2 |
| 2014 US Senate | W | 36.1 | 95.6 | 4.4 | 47.1 | 58.6 | 41.4 | 76.5 | 74.7 | 72.9 | 71.1 | 69.4 |
| 2012 President | AA | 61.0 | 97.6 | 2.4 | 68.4 | 53.7 | 46.3 | 76.6 | 74.4 | 72.2 | 70.1 | 67.9 |
| 2012 US Senate | W | 60.7 | 96.7 | 3.3 | 67.5 | 60.2 | 39.8 | 79.3 | 77.5 | 75.7 | 73.9 | 72.1 |

Def. App. 030a

30:25 PM

| OAKLAND COUNTY Percent Black VAP needed to win | race of B-P candidate | turnout rate for office and percent vote for black-preferred candidates | | | | | | percent of vote B-P cand would have received if district was 55% black VAP | percent of vote B-P cand would have received if district was 50% black VAP | percent of vote B-P cand would have received if district was 45% black VAP | percent of vote B-P cand would have received if district was 40% black VAP | percent of vote B-P cand would have received if district was 35% black VAP |
| | | Black votes | | | White votes | | | | | | | |
| | | votes cast for office | B-P | all others | votes cast for office | B-P | all others | | | | | |
| **GENERAL ELECTIONS** | | | | | | | | | | | | |
| 2020 President | W | 71.6 | 93.4 | 6.6 | 86.4 | 45.9 | 54.1 | 69.8 | 67.4 | 65.1 | 62.8 | 60.6 |
| 2020 US Senate | W | 71.4 | 92.1 | 7.9 | 85.4 | 43.5 | 56.5 | 68.1 | 65.6 | 63.2 | 60.9 | 58.6 |
| 2018 Governor | W | 53.2 | 94.1 | 5.9 | 68.8 | 47.4 | 52.6 | 70.1 | 67.8 | 65.5 | 63.3 | 61.1 |
| 2018 Secretary of State | W | 53.1 | 94.2 | 5.8 | 67.7 | 47.5 | 52.5 | 70.4 | 68.0 | 65.8 | 63.5 | 61.4 |
| 2018 Attorney General | W | 52.5 | 93.8 | 6.2 | 67.0 | 43.0 | 57.0 | 67.9 | 65.3 | 62.8 | 60.4 | 58.1 |
| 2018 US Senate | W | 53.2 | 93.0 | 7.0 | 68.7 | 45.5 | 54.5 | 68.6 | 66.2 | 63.9 | 61.7 | 59.5 |
| 2016 President | W | 65.6 | 95.1 | 4.9 | 73.5 | 39.1 | 60.9 | 68.3 | 65.5 | 62.7 | 60.0 | 57.3 |
| 2014 Governor | W | 46.3 | 94.8 | 5.2 | 54.6 | 30.6 | 69.4 | 63.3 | 60.1 | 56.9 | 53.8 | 50.7 |
| 2014 Secretary of State | AA | 45.9 | 94.6 | 5.4 | 53.1 | 26.4 | 73.6 | 61.4 | 58.0 | 54.7 | 51.3 | 48.1 |
| 2014 Attorney General | W | 45.8 | 94.1 | 5.9 | 52.6 | 32.9 | 67.1 | 64.5 | 61.4 | 58.4 | 55.4 | 52.4 |
| 2014 US Senate | W | 46.5 | 95.0 | 5.0 | 53.7 | 46.7 | 53.3 | 71.5 | 69.1 | 66.7 | 64.4 | 62.1 |
| 2012 President | AA | 68.9 | 95.7 | 4.3 | 75.7 | 42.1 | 57.9 | 70.3 | 67.6 | 65.0 | 62.3 | 59.7 |
| 2012 US Senate | W | 67.8 | 95.8 | 4.2 | 74.0 | 47.6 | 52.4 | 73.1 | 70.6 | 68.3 | 65.9 | 63.5 |

30:25 PM

| WAYNE COUNTY Percent Black VAP needed to win | race of B-P candidate | turnout rate for office and percent vote for black-preferred candidates | | | | | | percent of vote B-P cand would have received if district was 55% black VAP | percent of vote B-P cand would have received if district was 50% black VAP | percent of vote B-P cand would have received if district was 45% black VAP | percent of vote B-P cand would have received if district was 40% black VAP | percent of vote B-P cand would have received if district was 35% black VAP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Black votes | | | White votes | | | | | | | |
| | | votes cast for office | B-P | all others | votes cast for office | B-P | all others | | | | | |
| GENERAL ELECTIONS | | | | | | | | | | | | |
| 2020 President | W | 58.0 | 97.5 | 2.5 | 76.6 | 47.5 | 52.5 | 71.5 | 69.0 | 66.6 | 64.3 | 62.0 |
| 2020 US Senate | W | 57.8 | 95.2 | 4.8 | 75.6 | 47.2 | 52.8 | 70.4 | 68.0 | 65.7 | 63.4 | 61.2 |
| 2018 Governor | W | 33.2 | 97.0 | 3.0 | 63.2 | 53.5 | 46.5 | 70.5 | 68.5 | 66.6 | 64.8 | 63.1 |
| 2018 Secretary of State | W | 33.1 | 97.0 | 3.0 | 62.2 | 53.6 | 46.4 | 70.7 | 68.7 | 66.8 | 65.0 | 63.3 |
| 2018 Attorney General | W | 32.7 | 95.5 | 4.5 | 61.3 | 49.4 | 50.6 | 67.6 | 65.4 | 63.4 | 61.5 | 59.7 |
| 2018 US Senate | W | 33.1 | 95.8 | 4.2 | 63.1 | 52.3 | 47.7 | 69.3 | 67.3 | 65.4 | 63.6 | 61.9 |
| 2016 President | W | 57.0 | 98.4 | 1.6 | 64.0 | 39.7 | 60.3 | 70.3 | 67.4 | 64.4 | 61.6 | 58.7 |
| 2014 Governor | W | 35.8 | 96.5 | 3.5 | 47.7 | 41.3 | 58.7 | 67.7 | 65.0 | 62.3 | 59.7 | 57.2 |
| 2014 Secretary of State | AA | 35.5 | 96.8 | 3.2 | 46.1 | 36.8 | 63.2 | 65.9 | 62.9 | 60.0 | 57.2 | 54.4 |
| 2014 Attorney General | W | 35.3 | 95.7 | 4.3 | 45.9 | 41.0 | 59.0 | 67.5 | 64.8 | 62.1 | 59.5 | 57.0 |
| 2014 US Senate | W | 35.7 | 98.0 | 2.0 | 46.8 | 53.4 | 46.6 | 74.9 | 72.7 | 70.5 | 68.4 | 66.4 |
| 2012 President | AA | 60.4 | 99.0 | 1.0 | 65.7 | 51.9 | 48.1 | 76.8 | 74.5 | 72.1 | 69.8 | 67.5 |
| 2012 US Senate | W | 59.9 | 98.1 | 1.9 | 64.4 | 57.6 | 42.4 | 79.1 | 77.1 | 75.1 | 73.1 | 71.1 |

# Threshold of Representation: State Senate

- All districts over 48% Black elect minority candidates

- 67% of districts over 35% Black elect minority candidates

- No state senate districts between 36 and 45% Black

| State Senate District | Total VAP | Black VAP | Percent Black VAP | Name | party | race | Percent of vote 2018 |
|---|---|---|---|---|---|---|---|
| 5 | 203828 | 111418 | 54.66% | Betty Jean Alexander | D | Black | 77.4 |
| 2 | 169357 | 86961 | 51.35% | Adam Hollier | D | Black | 75.7 |
| 3 | 186758 | 90737 | 48.59% | Sylvia Santana | D | Black | 81.8 |
| 4 | 180199 | 85691 | 47.55% | Marshall Bullock | D | White | 78.3 |
| 1 | 193087 | 87075 | 45.10% | Stephanie Chang | D | Asian | 72.0 |
| 11 | 229870 | 82336 | 35.82% | Jeremy Moss | D | White | 76.7 |
| 27 | 175918 | 54071 | 30.74% | Jim Ananich | D | White | 71.2 |
| 9 | 219325 | 50800 | 23.16% | Paul Wojno | D | White | 65.9 |
| 6 | 217734 | 46997 | 21.58% | Erika Geiss | D | Black | 61.4 |
| 12 | 211638 | 32206 | 15.22% | Rosemary Bayer | D | White | 49.4 |
| 18 | 243159 | 36228 | 14.90% | Jeff Irwin | D | White | 76.6 |
| 23 | 215527 | 30579 | 14.19% | Curtis Hertel Jr. | D | White | 68.5 |
| 32 | 202924 | 28006 | 13.80% | Ken Horn | R | White | 55.5 |
| 29 | 225476 | 30876 | 13.69% | Winnie Brinks | D | White | 56.9 |
| 20 | 204328 | 24631 | 12.05% | Sean McCann | D | White | 53.1 |
| 34 | 195673 | 19534 | 9.98% | Jon Bumstead | R | White | 50.7 |
| 21 | 207567 | 20185 | 9.72% | Kim LaSata | R | White | 58.1 |
| 10 | 232106 | 19162 | 8.26% | Michael Macdonald | R | White | 51.0 |
| 7 | 225553 | 17825 | 7.90% | Dayna Polehanki | D | White | 50.6 |
| 19 | 204186 | 15725 | 7.70% | John Bizon | R | White | 58.6 |
| 15 | 226099 | 16436 | 7.27% | Jim Runestad | R | White | 51.7 |
| 8 | 227952 | 15653 | 6.87% | Peter J. Lucido | R | White | 61.8 |
| 26 | 212280 | 14313 | 6.74% | Aric Nesbitt | R | White | 56.7 |
| 16 | 195953 | 12509 | 6.38% | Mike Shirkey | R | White | 62.7 |
| 14 | 201692 | 11250 | 5.58% | Ruth Johnson | R | White | 55.7 |
| 28 | 214199 | 10152 | 4.74% | Peter Macgregor | R | White | 58.4 |
| 24 | 213683 | 8997 | 4.21% | Tom Barrett | R | White | 53.5 |
| 13 | 229773 | 9353 | 4.07% | Mallory Mcmorrow | D | White | 51.9 |
| 33 | 193451 | 7781 | 4.02% | Rick Outman | R | White | 58.8 |
| 17 | 200526 | 6436 | 3.21% | Dale W. Zorn | R | White | 57.9 |
| 30 | 226068 | 5258 | 2.33% | Roger Victory | R | White | 63.3 |
| 25 | 206658 | 4409 | 2.13% | Dan Lauwers | R | White | 64.0 |
| 37 | 209210 | 4076 | 1.95% | Wayne Schmidt | R | White | 59.0 |
| 31 | 195335 | 3241 | 1.66% | Kevin Daley | R | White | 60.2 |
| 38 | 202739 | 3086 | 1.52% | Ed McBroom | R | White | 54.6 |
| 22 | 213082 | 2912 | 1.37% | Lana Theis | R | White | 56.0 |
| 35 | 204742 | 2729 | 1.33% | Curt VanderWall | R | White | 63.3 |
| 36 | 196947 | 1872 | 0.95% | Jim Stamas | R | White | 64.3 |

# Threshold of Representation: State House

30:25 PM

- All districts over 36% Black elect minority candidates

- 89% of districts over 25% Black elect minority candidates

- No state house districts between 37 and 47% Black

| State House District | Total VAP | Black VAP | Percent Black VAP | Name | Party | Race | Percent of Vote 2020 |
|---|---|---|---|---|---|---|---|
| 7 | 60347 | 57256 | 94.88% | Helena Scott | D | Black | 93.0 |
| 8 | 62448 | 58042 | 92.94% | Stephanie A. Young | D | Black | 96.7 |
| 3 | 54130 | 49536 | 91.51% | Shri Thanedar | D | Asian | 93.3 |
| 9 | 62529 | 46806 | 74.85% | Karen Whitsett | D | Black | 94.2 |
| 10 | 69209 | 46977 | 67.88% | Mary Cavanagh | D | Hispanic | 84.8 |
| 1 | 59788 | 38993 | 65.22% | Tenisha R. Yancey | D | Black | 75.8 |
| 35 | 78306 | 49325 | 62.99% | Kyra Harris Bolden | D | Black | 82.9 |
| 34 | 49491 | 30419 | 61.46% | Cynthia R. Neeley | D | Black | 86.7 |
| 2 | 57031 | 33142 | 58.11% | Joe Tate | D | Black | 74.1 |
| 5 | 49290 | 27190 | 55.16% | Cynthia A. Johnson | D | Black | 93.4 |
| 6 | 67505 | 36182 | 53.60% | Tyrone Carter | D | Black | 100.0 |
| 4 | 68749 | 32761 | 47.65% | Abraham Aiyash | D | ME | 89.8 |
| 29 | 72319 | 26621 | 36.81% | Brenda Carter | D | Black | 72.9 |
| 95 | 58640 | 21320 | 36.36% | Amos O'Neal | D | Black | 70.1 |
| 49 | 64844 | 19308 | 29.78% | John D. Cherry | D | White | 68.9 |
| 54 | 72426 | 21212 | 29.29% | Ronnie Dean Peterson | D | Black | 77.7 |
| 12 | 73883 | 20207 | 27.35% | Alex Garza | D | Hispanic | 62.4 |
| 11 | 73586 | 19760 | 26.85% | Jewell Jones | D | Black | 65.2 |
| 92 | 66135 | 16957 | 25.64% | Terry J. Sabo | D | White | 65.3 |
| 27 | 73337 | 18051 | 24.61% | Regina Weiss | D | White | 74.4 |
| 75 | 76956 | 18127 | 23.56% | David LaGrand | D | White | 74.6 |
| 16 | 74617 | 17556 | 23.53% | Kevin Coleman | D | White | 62.5 |
| 68 | 71672 | 16808 | 23.45% | Sarah Anthony | D | Black | 75.9 |
| 18 | 75251 | 16519 | 21.95% | Kevin Hertel | D | White | 60.3 |
| 60 | 74176 | 15887 | 21.42% | Julie M. Rogers | D | White | 71.4 |
| 22 | 68758 | 14588 | 21.22% | Richard M. Steenland | D | White | 59.9 |
| 28 | 70132 | 14012 | 19.98% | Lori M. Stone | D | White | 60.3 |
| 79 | 65091 | 12312 | 18.92% | Pauline Wendzel | R | White | 56.6 |
| 31 | 71180 | 13047 | 18.33% | William J. Sowerby | D | White | 56.3 |
| 37 | 78055 | 14166 | 18.15% | Samantha Steckloff | D | White | 63.9 |
| 62 | 69641 | 11301 | 16.23% | Jim Haadsma | D | White | 51.3 |
| 21 | 77493 | 11721 | 15.13% | Ranjeev Puri | D | Asian | 59.2 |
| 76 | 79357 | 11258 | 14.19% | Rachel Hood | D | White | 62.8 |
| 72 | 79315 | 10619 | 13.39% | Steven Johnson | R | White | 55.1 |
| 50 | 72856 | 8173 | 11.22% | Tim Sneller | D | White | 54.2 |
| 24 | 73550 | 8072 | 10.97% | Steve Marino | R | White | 57.5 |
| 55 | 79483 | 8123 | 10.22% | Felicia Brabec | D | White | 72.4 |
| 64 | 65167 | 6497 | 9.97% | Julie Alexander | R | White | |

Michigan - District Percentage of Voting-Age Non-Hispanic African Americans including combination with other races

State House Districts

State Senate Districts
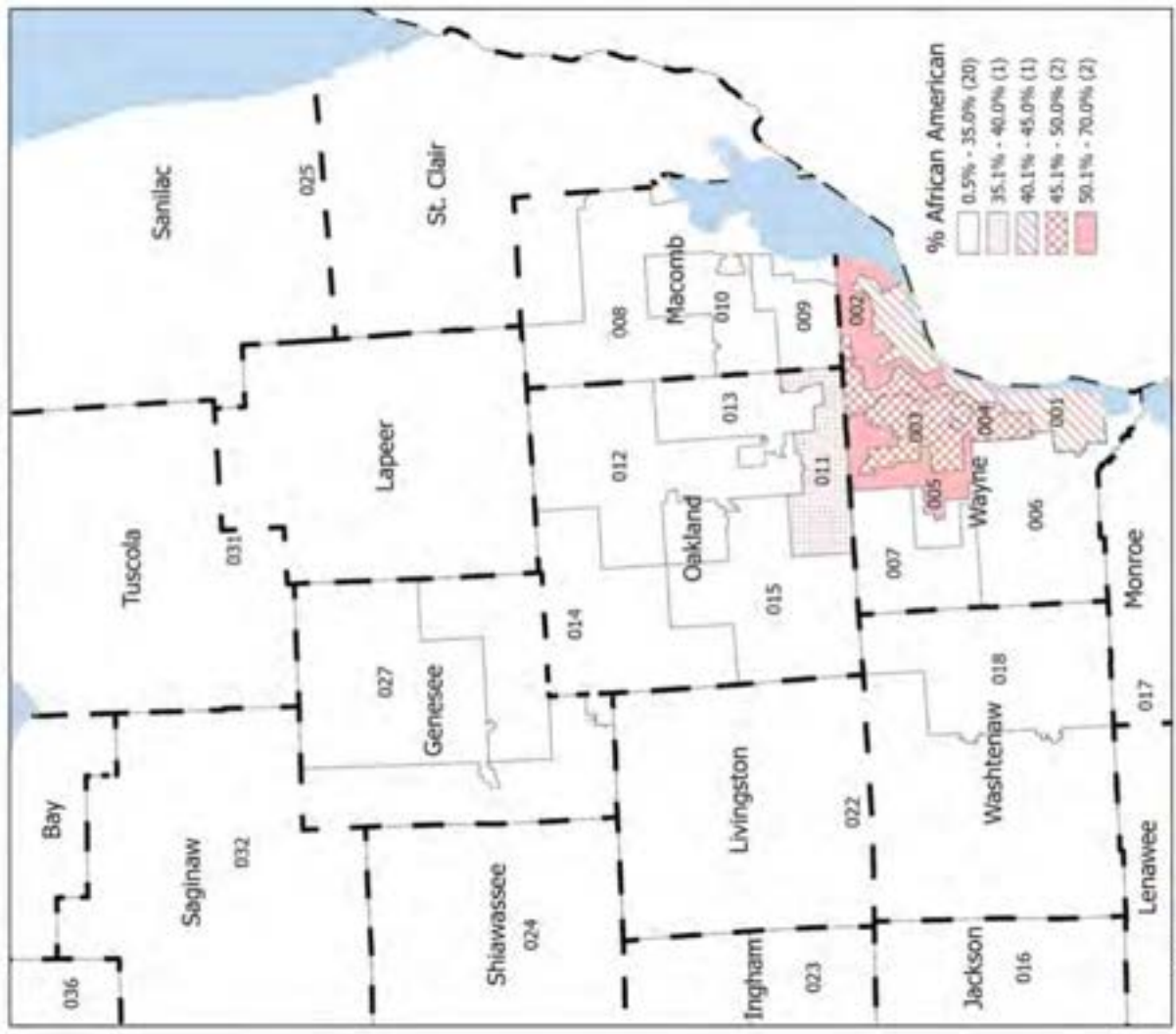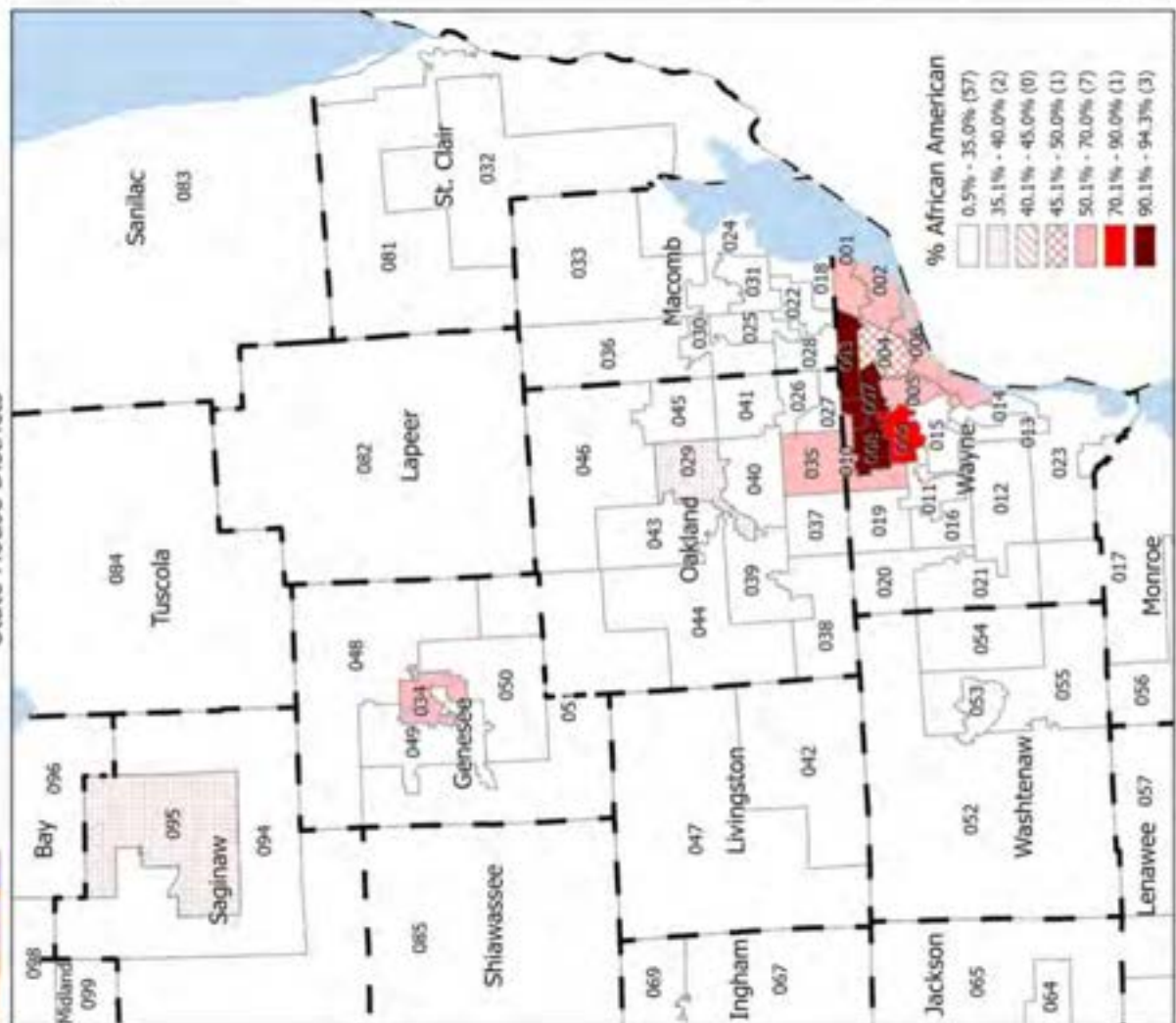
Def. App. 035a

30:25 PM

% African American
0.5% - 35.0% (57)
35.1% - 40.0% (2)
40.1% - 45.0% (0)
45.1% - 50.0% (1)
50.1% - 70.0% (7)
70.1% - 90.0% (1)
90.1% - 94.3% (3)

% African American
0.5% - 35.0% (20)
35.1% - 40.0% (1)
40.1% - 45.0% (1)
45.1% - 50.0% (2)
50.1% - 70.0% (2)

>> CHAIR SZETELA: Absolutely.

>> DR. LISA HANDLEY: Have I done it.

>> CHAIR SZETELA: Yes, you have.

>> DR. LISA HANDLEY: Okay very good. Some select minority groups were identified, I think it was between basically between your legal staff and sorry between your legal staff and you all. And so I've looked at the voting patterns of a few groups but I wasn't able to look at when I was looking at the state as a whole or even Counties as a whole. But I did find a way to look at Hispanic voting patterns, Arab American voting patterns, Bengali American voting patterns and Chaldean voting patterns. In very specific areas and I just wanted to take about five minutes to show you what I found and I bet you won't be surprised about in any of this so let's go ahead.

So the way I was able to actually pull out voting patterns I had to localize the analysis. As I said I could not do it statewide I could not do it within the County but if I chose very small areas, I could produce some estimates. And so I was able to produce estimates for two areas. On opposite sides of the state. So one for Hispanics in the Detroit area and the second for Hispanics in the Grand Rapids area. And it's interesting because the voting patterns were slightly different. So here on the left is the map of the area that I actually looked at. I think Mexican town somewhere right around here. This is just the broader area around that. So we are right down around Mexican town. This is the area with the heaviest Hispanic population in Detroit. And over here is the summary chart. You will remember that I talk about producing two kinds of estimates ecological regression and ecological inference and they are produced in different by different statistical approaches so they won't always be the same, they won't or never be exactly the same but they are usually in the same ballpark. And what you can see here is that they are the same ballpark and that not surprisingly Hispanics in the Detroit area tend to vote for democrats.

And then down here in the democratic primary, I guess you could say the candidate of choice, although they are not overly cohesive is El-Sayed so that is what I found out in terms of the Detroit area.

Then in terms of Grand Rapids, we looked at was I think it's the western portion of Grand Rapids. And an area called Wyoming. And combining those two I was able to produce Hispanic estimates here. Now what I found was first of all they are more cohesive in their support for democrats. But second of all, they turn out at lower rates. And this could be voting age population and not citizen age voting population so a big part of the difference might be the citizen voting age population. So turn out lower to create a support for democrats higher. Okay, then the next group I looked at was Arab American voting patterns. And I think you all pretty much figured out what was happening here. So I focused in on Dearborn Heights and Dearborn. And this is in part because this allowed me to do the analysis. But it also encompassed more than a third of the Arab American population in Michigan. In just this concentrated area according

to the Census Bureau. So what you can see here is very strong support for democratic candidates. Regardless whether you're looking at ER or EI it's incredibly high. Then when you look at the democratic primary there is very strong support for El-Sayed. So they are very cohesive both in the primaries and the general elections in support of in the general elections democrats.

Okay, here is I told you I used two different techniques. And this is the first technique. Ecological regression. In each of these points on the scatter plot is a precinct in Dearborn Heights or Dearborn. And it shows a very strong pattern between the higher the proportion Arab American in the precincts and the stronger the support candidate would be in this particular instance. So you can visually see the very strong support for the democratic Presidential candidate in 2020.

The Bengali American voting patterns are essentially identical to those of Arab Americans. The area that we looked at is the area that was identified by various Bengali group as the areas that Bengalis tended to live in. So all we did here was use the Asian population and assumed that most of the Asians that we were analyzing were Bengali so very strong support for democratic candidates and very strong support in the democratic primary for El-Sayed.

And then we come to the Chaldean voting patterns. And what's interesting about this first of all we are focused on Sterling Heights. That was the only way to get any sort of estimates out. The estimates are not great. They have very high standard errors and confidence in the rules because the higher proportion across any of these precincts was only about 30%. But from what we could tell this is not a particularly cohesive community. They pretty much are divided between democrats and republicans. Until 2020. And in which case they very strongly supported Trump. So they do not look like Arab Americans. They do not look like the Bengali community. They are voting differently. Here is you can see the scatter plot now here the relationship is exactly the opposite of what you saw when we were looking at Arab Americans. And so that is basically in a five-minute nutshell what I found. And what I wanted to do really was to answer any questions you might have about these voting patterns and also have to say I've gotten several questions about partisan fairness that I thought I could through e-mail that I thought I could answer as well. Anyway if you have any questions about anything now would be the time to ask me.

>> CHAIR SZETELA: Commissioner Clark?

>> COMMISSIONER CLARK: Yes. Thank you, Lisa. The question I have is you used the 2020 Presidential race. Why did you not use the composite index?

>> DR. LISA HANDLEY: I'm looking at actual voting patterns as you would if you were doing a racial bloc voting analysis. So I have actual election results here. And when we are looking at voting patterns, we want to look at actual voting patterns. We are only looking at the composite index when we are looking at partisan fairness as an attempt to project what we think might happen in proposed districts. Since we don't

have any elections in them. But if we are trying to determine what voting patterns look like in the past, we have elections. And that's what I used to do this. This is what you do to look at racial bloc voting analysis. When I gave you my preliminary that is based off the elections.

>> VICE CHAIR ROTHHORN: Hi Dr. Handley. So with the Bengali community we also have the Yemeni community. I'm wondering if there is a strong correlation with the Arab community because of that. And were you able to differentiate you're only using, okay, not, okay.

>> DR. LISA HANDLEY: So from the census numeration data we can get Hispanics and we can get Asians. We can get Arab Americans through the American community survey which is also a census product. We cannot get Bengalis. So this is Asians. So if the Yemeni community lives exactly where the Bengali community is there is no way to differentiate them.

>> VICE CHAIR ROTHHORN: Okay thank you. And then the last question I have is related to sort of how can this -- can we make assumptions now about a coalition District? Are we able to build coalition districts so to speak because of this information? Or do we still not have sort of cohesive understanding the African/American for example in the Hispanic line up because they are democratic or the Arab American and the Bengali community line up and they create a -- could create a coalition District because of that democratic preference or is that not a fair assumption to make in terms of voting preferences?

>> DR. LISA HANDLEY: Why I'm hesitating is that in the democratic primary, again, we only have the one statewide democratic party primary, I would be cautious because I don't think that Hispanics -- Hispanics and Arab Americans supported El-Sayed. But now I can't remember who Black voters supported because I don't think it was El-Sayed, was it?

>> VICE CHAIR ROTHHORN: It was Whitmer. Cohesive.

>> MR. BRUCE ADELSON: They were not cohesive.

>> DR. LISA HANDLEY: None of these groups, I shouldn't say that Hispanic and Black voters were not particularly cohesive in their support in the democratic primary was there is no question that Arab American and Bengalis were very cohesive in their support in the democratic primary. So it's a little hard in my opinion to argue that you're going to produce what would satisfy the three prongs of Jingles if you wanted to create this District. But there is no question that they all support democrats in the general election. I will leave it up to the lawyers to actually tell you what this means in terms of the legal ramifications of this.

>> CHAIR SZETELA: I can't see the folks online so Commissioner Kellom, Commissioner Curry or Commissioner Wagner if you have your hands up, please let me know because I can't tell. I cannot see.

>> DR. LISA HANDLEY: I will stop sharing so I can see you guys.

>> CHAIR SZETELA: All right, any additional comments or questions? Commissioner Eid?

>> COMMISSIONER EID: Well, it seems like most of the assumptions we have made in mapping have borne out to be correct. So I'm just wondering is there any better way to use this data and this analysis moving forward while making these final changes on our maps?

>> DR. LISA HANDLEY: Somewhat of a question for the lawyers who have been sitting there the whole time and watching this and knowing what is possible. But I will tell you that it looks like these are very cohesive communities. With exception of the Chaldeans. And I'm not sure what you can do in terms of the first prong of Jingles. But I would hesitate to sort of draw lines down the middle of them. But I think some of these are too large, aren't they? I don't think you can include Dearborn Heights and Dearborn in the same District. But again this is something probably the lawyers should answer or somebody who has been watching the drawing process and can actually tell you where people live and what this could mean.

>> CHAIR SZETELA: So Dr. Handley, for the Chaldean community could you bring up that map again and indicate where, what area you analyzed, was that Oakland County?

>> DR. LISA HANDLEY: Yes, it was Oakland and I think some of Macomb. Let's bring it up again. You can probably better answer that better than me. I can't remember now. Let's see. Oh, no, it was just Sterling Heights for Chaldean this is Sterling Heights. This includes about a little more than a third of the Chaldean population in Michigan. And yes so, we looked at that whole area and only that area.

>> CHAIR SZETELA: Okay, thank you. Commissioner Eid?

>> COMMISSIONER EID: Just out of curiosity why wasn't West Bloomfield looked at for Chaldean population?

>> DR. LISA HANDLEY: Because we were looking at the highest concentration. So that I mean the whole reason that you couldn't do and also is it contiguous with this?

>> COMMISSIONER EID: No it's not.

>> DR. LISA HANDLEY: That is why. You couldn't do it alone. There weren't enough and you can't look at two areas separately really. So we just focused on the area with the largest population. It would not have been enough precincts in the at any other area to do this analysis for this group.

>> CHAIR SZETELA: All right and just to clarify for people who don't know Chaldean typically means Christians Arabic who are Catholic and most who live in Dearborn is Muslim so it could be a difference in really on. That is sort of driving the difference in voting.

>> COMMISSIONER EID: I would say that is accurate Chaldeans are Arab American it's more of a faith-based community. And issues surrounding the church are important to how Chaldeans vote. So that explains that in my eyes.

>> CHAIR SZETELA: All right, if unless anyone else has questions for Dr. Handley thank you for your time. We appreciate you coming and being at our Beck and call whenever we need you. [ Laughter ]
So thank you for your analysis. If you could send this to Sue so she can distribute it to everybody I would greatly appreciate it.

>> DR. LISA HANDLEY: Sure thing okay.

>> CHAIR SZETELA: All right. So Commissioner Kellom did you want to try to work on that map more?

>> COMMISSIONER KELLOM: What do we have left on our agenda for today? Just finishing up? I just want to make sure.

>> CHAIR SZETELA: Yeah, I mean well we have to finish Congressional then we move on to house. Mr. Adelson looks like he has a comment.

>> MR. BRUCE ADELSON: We thought this would be a good time to put in additional context. I know that Dr. Handley and I have an arrangement that she goes up to a certain point on the continuum and then she leaves the rest for us to talk about. So on to be consistent so let's talk a little bit about from a legal standpoint what she said.

It is very interesting that the Hispanic voting patterns in Wayne County are differ than they are in the Grand Rapids area. The speculation is the Hispanic population may be older in Wayne County than in the Grand Rapids area. They both vote cohesively. Meaning that they tend to support the same candidate. And in Grand Rapids the cohesion is greater. Turn out is higher in Wayne County. Cohesion is higher in Grand Rapids. The turnout is lower in Grand Rapids. Cohesion is moderately less here. I think for president in Wayne County as I recall 75% of Hispanics voted for Biden. And in Grand Rapids it's like 96%. So it's quite significant cohesion. The Arab American cohesion is even greater meaning Arab Americans within with the exceptions of Chaldeans voted cohesively as a group. So they tend to support the same candidates as in the elections analyzed Hispanics and Black voters. The Chaldean is interesting because that is they are obviously as Dr. Handley said an out liar as Arab Americans overall. So if that community which is not a large community could be pinpointed that is something the Commission might want to look at. As far as not splitting them. The Bengali highly cohesive, turn out is high and again they support the same generally the same candidates as Hispanics, Arab Americans and Black voters.

So what does this mean going forward? That as we had speculated before about Hispanic voting patterns, Hispanic voting patterns can be aligned up to a point with Black voting patterns. To answer your question, Commissioner, that would seem to have some potential in a coalition District. So that is different than if Hispanic voting patterns were like Chaldean voting patterns. Then that would not line up as a coalition District with groups supporting the same candidate. So I think that's very important. I think we both think that is very important going forward and looking at Hispanic populations, the Arab American population and the Bengali population in the Detroit

area. That there is a commonality of support. Yes, there are differences in turn out. There are differences in cohesion. But it's not like the Chaldean voting patterns. Which is those are quite different. And they would not be a viable coalition partner so to speak. To the same extent that Bengali supporters would be. Our advice is the populations now may have additional play as you're looking at the potential adjustments to districts, not only in fortifying districts with plurality or majority minority populations. But they may also be a significant part of districts that either have not been considered or were considered but there was some uncertainty whether the voting patterns lined up. So I think that is our takeaway from what Dr. Handley discussed today. It's something as you know we have been waiting for a while because we had identified this as a very important piece of the voting rights puzzle. And also the 14th amendment equal protection. So those are our general thoughts. Thank you.

>> CHAIR SZETELA: All right any questions for Mr. Adelson? Okay, so the point we are at right now is 5:25. We have three proposed Congressional maps that we worked on and then a fourth that Commissioner Kellom I'm not sure if you still want to work on more or not. Do we want to take any action or make any more changes to the three that we worked on earlier? Are we interested in moving them forward? Commissioner Orton?

>> COMMISSIONER ORTON: One of them, I'm not sure which one, perhaps Chestnut one of them had higher population deviation that I think we could bring down. We had made some changes to it, but we didn't really focus on that.

>> CHAIR SZETELA: Okay, I think -- I'm not sure which one. Does anyone remember which one? I feel like it was apple because I thought that was the last one, we worked on. But I'm not.

>> COMMISSIONER ORTON: Maybe apple can you pull it up.

>> CHAIR SZETELA: Can we pull up apple and take a look? I thought we made the changes around Grand Rapids and that changed the deviation a bit. So .78.

>> MR. KENT STIGALL: .78, those are the two and that is the way it was left.

>> CHAIR SZETELA: Feel free to lead the discussion Commissioner Orton.

>> COMMISSIONER ORTON: Okay, I think we need to fix that. Can you Zoom in to the line between five and four? Okay so the issue is, just going to make a skinnier neck there.

>> CHAIR SZETELA: One more.

>> COMMISSIONER ORTON: It looks like the precincts are almost Townships in most of that area.

>> CHAIR SZETELA: Commissioner Witjes?

>> COMMISSIONER WITJES: What about that precinct with the big squiggly line in four?

>> VICE CHAIR ROTHHORN: That is next to 13.

>> CHAIR SZETELA: Bordering 13.

<div align="center">

**Report to the Michigan Independent Citizens Redistricting Commission**

**Dr. Lisa Handley**

</div>

**Preface**

This report outlines the analyses I conducted on behalf of the Michigan Independent Citizens Redistricting Commission (MICRC) and relays my findings. I also briefly explain the partisan fairness measures I advised the MICRC to adopt as a component of the redistricting software and why I made these recommendations. The legal implications of my findings and the assessment of any proposed plans have been left to the MICRC legal team.

**I.   The Voting Rights Act and Racially Polarized Voting**

The Voting Rights Act of 1965 prohibits any voting standard, practice or procedure – including redistricting plans – that result in the denial or dilution of minority voting strength. Section 2 of the Voting Rights Act was amended in 1982 to establish that intentional discrimination need not be proven (as the Supreme Court determined was required under the 15th Amendment to the Constitution). The U.S. Supreme Court first interpreted the amended Act in *Thornburg v. Gingles*,[1] a challenge to the 1982 North Carolina state legislative plans. In this case the U.S. Supreme Court held that plaintiffs must satisfy three preconditions to qualify for relief:

- The minority group must be sufficiently large and geographically compact to form a majority in a single-member district
- The minority group must be politically cohesive
- Whites must vote as a bloc to usually defeat the minority-preferred candidates

What do we mean when we say minority voters must be politically cohesive? And how do we know if white voters usually vote as a bloc to defeat the candidates preferred by minority voters? According to the Court, racially polarized voting is the "evidentiary linchpin" of a vote dilution claim. Voting is racially polarized if minorities and whites consistently vote for different candidates. More specifically, if minorities consistently support the same candidates, they are said to be politically cohesive. If whites are consistently *not* supporting these candidates, they are said to be bloc voting against the minority-preferred candidates.

---

[1] 478 U.S. 30 (1986).

<div align="center">

**Def. App. 042a**

</div>

The Voting Rights Act requires a state or local jurisdiction to create districts that provide minority voters with an opportunity to elect their candidates of choice if voting is racially polarized and the candidates preferred by minority voters usually lose. If districts that provide minority voters with the opportunity to elect their preferred candidates already exist, these must be maintained.

## A. Analyzing Voting Patterns by Race

An analysis of voting patterns by race serves as the foundation of two of the three elements of the "results test" as outlined in *Gingles*: a racial bloc voting analysis is needed to determine whether the minority group is politically cohesive; and the analysis is required to determine if whites are voting sufficiently as a bloc to usually defeat the candidates preferred by minority voters. The voting patterns of white and minority voters must be estimated using statistical techniques because direct information the race of the voters is not, of course, available on the ballots cast.

To carry out an analysis of voting patterns by race, an aggregate level database must be constructed, usually employing election precincts as the units of observation. Information relating to the demographic composition and election results in these precincts is collected, merged and statistically analyzed to determine if there is a relationship between the racial composition of the precincts and support for specific candidates across the precincts.

***Standard Statistical Techniques*** Three standard statistical techniques have been developed over time to estimate vote choices by race: homogeneous precinct analysis, ecological regression, and ecological inference.[2] Two of these analytic procedures – homogeneous precinct analysis and ecological regression – were employed by the plaintiffs' expert in *Gingles*, have the benefit of the Supreme Court's approval in that case, and have been used in most subsequent voting rights cases. The third technique, ecological inference, was developed after the *Gingles* decision and was designed, in part, to address some of the disadvantages associated with ecological regression analysis. Ecological inference analysis has been introduced and accepted in numerous court proceedings.

---

[2] For a detailed explanation of homogenous precinct analysis and ecological regression see Bernard Grofman, Lisa Handley and Richard Niemi, *Minority Representation and the Quest for Voting Equality* (Cambridge University Press, 1992). See Gary King, *A Solution to the Ecological Inference Problem* (Princeton University Press, 1997) for a more detailed explanation of ecological inference.

Homogeneous precinct (HP) analysis is the simplest technique. It involves comparing the percentage of votes received by each of the candidates in precincts that are racially or ethnically homogeneous. The general practice is to label a precinct as homogeneous if at least 90 percent of the voting age population is composed of a single race.[3] In fact, the homogeneous results reported are not estimates – they are the actual precinct results. However, most voters in Michigan do not reside in homogeneous precincts and voters who reside in homogeneous precincts may not be representative of voters who live in more racially diverse precincts. For this reason, I refer to these percentages as estimates.

The second statistical technique employed, ecological regression (ER), uses information from all precincts, not simply the homogeneous ones, to derive estimates of the voting behavior of minorities and whites. If there is a strong linear relationship across precincts between the percentage of minorities and the percentage of votes cast for a given candidate, this relationship can be used to estimate the percentage of minority (and white) voters supporting the candidate.

The third technique, ecological inference (EI), was developed by Professor Gary King. This approach also uses information from all precincts but, unlike ecological regression, it does not rely on an assumption of linearity. Instead, it incorporates maximum likelihood statistics to produce estimates of voting patterns by race. In addition, it utilizes the method of bounds, which uses more of the available information from the precinct returns as well as providing more information about the voting behavior being estimated.[4] Unlike ecological regression, which can produce percentage estimates of less than 0 or more than 100 percent, ecological inference was designed to produce only estimates that fall within the possible limits. However, EI does not guarantee that the estimates for all of the candidates add to 100 percent for each of the racial groups examined.

In conducting my analysis of voting patterns by race in statewide elections in Michigan, I also used a more recently developed version of ecological inference, which I have labeled "EI

---

[3] If turnout or registration by race is available, this information is used to identify homogenous precincts.

[4] The following is an example of how the method of bounds works: if a given precinct has 100 voters, of whom 75 are Black and 25 are white, and the Black candidate received 80 votes, then at least 55 of the Black voters voted for the Black candidate and at most all 75 did. (The method of bounds is less useful for calculating estimates for white voters in this example as anywhere between none of the whites and all of the whites could have voted for the candidate.)

**Def. App. 044a**

RxC" in the summary tables found in the Appendices at the end of the report. EI RxC expands the analysis so that more than two racial/ethnic groups can be considered simultaneously. It also allows us to take into account differences in the relative rates of minority and white turnout when, as is the case in Michigan, we do not have turnout by race but instead must rely on voting age population by race to derive estimates of minority and white support for each of the candidates.

*Database* To analyze voting patterns by race using aggregate level information, a database that combines election results with demographic information is required. This database is almost always constructed using election precincts as the unit of analysis. The demographic composition of the precincts is based on voter registration or turnout by race/ethnicity if this information is available; if it is not, then voting or citizen voting age population is used. Michigan does not collect voter registration data by race and therefore voting age population (VAP) by race and ethnicity as reported in the PL94-171 census redistricting data was used for ascertaining the demographic composition of the precincts.[5]

The precinct election returns for the general elections, as well as precinct shape files, census block-to-precinct assignment files,[6] and election results disaggregated to the block level were supplied by the Michigan Secretary of State. The Democratic primary results had to be collected county by county and were either downloaded directly or cut and pasted from pdf files.

*Geographic areas* Producing reliable estimates of voting patterns by race requires an adequate number of minority and white voters, an adequate number of election precincts, and sufficient variation in the percentage of minority and white voters across the precincts. Only a few counties in Michigan satisfied these conditions, and only for one group of minority voters – Black voters. It was not possible to produce reliable statewide or countywide estimates for Hispanic or Asian voters in Michigan. However, estimates for Hispanics, as well as some additional minority groups, were produced for very localized areas in Michigan and this analysis is discussed below in a separate section entitled "Voting Patterns of Minority Voters other than Black Voters." As a

---

[5] Since the only minority group sufficiently large enough in the State of Michigan to produce estimates of voting patterns is Black residents and there is not a high non-citizenship rate to account for when conducting the analysis, estimates of citizen voting age population by race were not included in the database.

[6] Shape files and block-to-precinct equivalency files made it possible to account for changes in precinct boundaries, and therefore precinct demographics, over time.

consequence of the three limitations listed above, I was able to reliably estimate the voting patterns of Blacks and whites statewide and in the four counties: Wayne, Oakland, Genesee, and Saginaw.

*Elections analyzed* All statewide elections held in the State during the preceding decade (2012-2020) were analyzed, both for voters within the state as a whole and in the four counties that had a sufficient number of Black VAP conduct the analysis – Wayne, Oakland, Genesee, and Saginaw. The general elections analyzed included: U.S. President (2012, 2016, 2020), U.S. Senate (2012, 2014, 2018, 2020), and the statewide offices of Governor, Secretary of State, and Attorney General in 2014 and 2018.

Four of these contests included African American candidates:[7] the 2012 presidential election, the 2014 election contest for Secretary of State, and the U.S. Senate contests in 2018 and 2020. Only two of these four contests included African American candidates supported by Black voters, however: Barack Obama in his bid for re-election in 2012 and Godfrey Dillard in his race for Secretary of State in 2014. John James, an African American Republican who ran for U.S. Senate in 2018 and 2020, was not the candidate of choice of Black voters. In addition, two election contests included African American candidates as running mates: the 2018 gubernatorial race in which Garlin Gilchrist ran for Lieutenant Governor and Gretchen Whitmer as Governor, and the 2020 presidential race in which Kamala Harris ran for Vice President. Both sets of running mates were strongly supported by Black voters.

There was only one statewide Democratic primary for statewide office the previous decade: the 2018 race for governor. I analyzed this Democratic primary (as well as congressional and state legislative Democratic primaries) and not Republican primaries because the overwhelming majority of Black voters who choose to vote in primaries cast their ballots in Democratic rather than Republican primaries. As a consequence, Democratic primaries are far more probative than Republican primaries for ascertaining the candidates preferred by Black voters.[8] Moreover, this

---

[7] Courts consider election contests that include minority candidates more probative than contests that include only white candidates for determining if voting is racially polarized. This is because it is not sufficient for minority voters to be able to elect their candidates of choice only if these candidates are white. On the other hand, it is important to recognize that not all minority candidates are the preferred candidates of minority voters.

[8] In addition, producing reliable estimates for Black voters in Republican primaries would not have been possible.

primary included two minority candidates: Abdul El-Sayed, who is of Egyptian descent, and Shri Thanedar, who is Indian-American.

In addition to these statewide elections, I also analyzed recent congressional and state legislative elections in districts that fell within Wayne, Oakland, Saginaw and Genesee Counties and had a Black VAP that was large enough to produce reliable estimates.[9] Because of the very substantial changes in district boundaries between the current district boundaries and any of the proposed district plan boundaries, these election contests cannot be considered indicative of voting patterns in any proposed districts. However, they are important for at least two reasons. First, although few minority candidates ran for office statewide, there were many who ran in legislative elections, especially in Wayne County. Second, while there was only one statewide Democratic primary conducted over the course of the previous decade, there have been numerous recent Democratic primaries for congressional and state legislative office.

## B. Statewide and County Results

Table 1, below, lists the number of statewide election contests that were racially polarized, both for Michigan as a whole, and for each of the four counties considered individually. This tabulation is based on the racial bloc voting summary tables found in Appendix A. The second column indicates the number of contests that included African American candidates that were polarized (over the total number of contests with African American candidates), the third column is the number of statewide general elections (out of the 13 analyzed) that were polarized and the final column reports the results of the only statewide Democratic primary.

Statewide, all election contests other than the 2012 US. Senate race won by Debbie Stabenow were racially polarized. (Her 2018 election contest, however, was racially polarized.) The candidate who obtained the lowest vote percentage statewide was African American candidate for Secretary of State in 2014, Godfrey Dillard. This was because he received less white crossover votes than any other candidate – the percentage of Black voters supporting him was comparable to the percentage of Black voters supporting the other Democratic candidates competing statewide.

---

[9] In some state house districts, there was not enough whites of voting age to conduct an analysis of voting patterns by race.

**Table 1: Number of Statewide Elections Analyzed that were Polarized**

| | General Elections with Minority Candidates | All Statewide General Election Contests | Statewide Democratic Primary |
|---|---|---|---|
| Statewide | 6/6 | 12/13 | 1/1 |
| Genesee | 5/6 | 9/13 | 1/1 |
| Saginaw | 6/6 | 11/13 | 1/1 |
| Oakland | 6/6 | 13/13 | 0/1 |
| Wayne | 3/6 | 7/13 | 1/1 |

Every statewide general election contest analyzed was polarized in Oakland County – only in the Democratic primary for Governor in 2018 did Black and white voters support the same candidate (Gretchen Whitmer). Voting in Saginaw County was nearly as polarized: two U.S. Senate contests (2012 and 2014) were not polarized, but the gubernatorial primary was polarized. Black and white voters agreed on the same candidates slightly more often in Genesee County – in addition to supporting U.S. senate candidates Debbie Stabenow in 2012 and Gary Peters in 2014, they both supported Barack Obama in 2012 and Democrat Mark Schauer for Governor in 2014.

Voting in Wayne County was considerably less racially polarized than statewide or in the other three counties studied. However, slightly more than half of the general election contests and the one statewide Democratic primary analyzed were polarized, with Black and white voters supporting the same candidates in 2012, disagreeing on the three statewide offices, but supporting the same U.S. Senate candidate in 2014, supporting different candidates for U.S. President in 2016 and 2020, and voting for most of the same candidates in 2018.

## C. Congressional and State Legislative Election Results

This section provides a summary of my racial bloc voting analysis of recent congressional and state legislative districts in the four-county area of Wayne, Oakland, Genesee and Saginaw. I analyzed 2018 and 2020 general elections, and the 2018 and 2020 Democratic primaries if at least one African American candidate competed in the election contest. However, for a number of state

legislative elections, there were too many candidates and too few votes cast to obtain reliable estimates. In addition, there were three state house districts – districts 3, 7, 8 – where there were an insufficient number of white voters to produce reliable estimates. The summary tables reporting each of estimates for these contests are found in Appendix B.

Table 2, below, summarizes the congressional district results for congressional districts 5, 9, 12, 13 and 14.[10] In most instances, voting was not racially polarized – in 80% of the general elections and 75% of the contested Democratic primaries analyzed, Black and white voters supported the same candidates. Three of the contests analyzed were, however, polarized. The Black-preferred candidate won two of these contests: Districts 5 and 13 in the 2020 general election. The other polarized contest was the 2018 bid for the Democratic nomination for full two-year term the in District 13. Six candidates competed in this contest, four African American candidates, including the candidate of choice of a plurality of Black voters, Brenda Jones; Bill Wild, a white candidate; and Rashida Tlaib, an American of Palestinian descent. White voters divided their votes between Wild and Tlaib. Tlaib won the nomination with 27,841 votes (31.17%), and Benda Jones came in a close second with 26,941 votes (30.16%).[11]

**Table 2: Summary of Congressional District Racial Bloc Voting Analysis**

| Congress District | Location | Percent BVAP | 2018 Democratic primary | 2018 General election | 2020 Democratic primary | 2020 General election |
|---|---|---|---|---|---|---|
| 5 | Genesee & Saginaw, plus | 16.63 | no contest | not polarized | no contest | polarized - won |
| 9 | Oakland & Macomb | 13.83 | only white candidates | not polarized | no contest | not polarized |
| 12 | Wayne & Washtenaw | 11.73 | no contest | not polarized | not polarized | not polarized |

[10] Congressional District 11, which is also located in the area of interest (Oakland and Wayne), as well as Districts 8 (partially in Oakland) and 4 (partially in Saginaw), had too few Black voters to produce reliable estimates of their vote choices.

[11] A special election for filling the partial term for District 13 – left vacant when John Conyers resigned – was conducted at the same time with many of the same candidates. Brenda Jones won this contest with 32,769 (37.75%) votes; Rashida Tlaib came in second with 31,121 (35.85%) votes.

| Congress District | Location | Percent BVAP | 2018 Democratic primary | 2018 General election | 2020 Democratic primary | 2020 General election |
|---|---|---|---|---|---|---|
| 13 | Wayne | 54.78 | polarized - lost | not polarized | not polarized | polarized - won |
| 14 | Wayne & Oakland | 55.16 | no contest | not polarized | not polarized | not polarized |

The results of my analysis recent state senate elections is found in Table 3, below. There were no Democratic primaries in two districts (12 and 27), and no minority candidates competed in a third (District 32). In addition, there was one Democratic primary in which 11 candidates competed – too many to produce reliable estimates. Of the 16 contests analyzed, 10 were not polarized (three primaries and seven general elections), four were polarized but the Black-preferred candidate won (two primaries and two generals), and two were polarized and the candidates of choice of Black voters lost. One of these contests was the general election in District 32, which has only 13.45% BVAP.[12] The other polarized contest that the Black-preferred candidate lost was the Democratic primary in State Senate District 1 in 2018. Six candidates competed in this election. The plurality choice of Black voters was African American candidate, Alberta Tinsley Talabi. A very large majority of white voters supported the Asian candidates, Stephanie Chang, who was the second choice of Black voters. Chang won with 49.8% of the vote (Talabi received 26.4%).

**Table 3: Summary of State Senate District Racial Bloc Voting Analysis**

| State Senate District | Location | Percent BVAP | 2018 Democratic primary | 2018 General election |
|---|---|---|---|---|
| 1 | Wayne | 44.68 | polarized - lost | not polarized |
| 2 | Wayne | 50.82 | *na* (11 candidates) | not polarized |

---

[12] The Black VAP percentages listed throughout this report are from the MICRC redistricting GIS active matrix tab labeled "5A," which indicates the percentage of non-Hispanic voting age population who indicated they were Black or Black in combination with any other race. This produces the maximum number of individuals within each racial group, including Black, but will result in totals over 100% since persons identifying as more than one race will be counted more than once.

**Def. App. 050a**

| State Senate District | Location | Percent BVAP | 2018 Democratic primary | 2018 General election |
|---|---|---|---|---|
| 3 | Wayne | 48.14 | polarized - won | not polarized |
| 4 | Wayne | 47.00 | not polarized | not polarized |
| 5 | Wayne | 54.25 | polarized - won | not polarized |
| 6 | Wayne | 21.29 | not polarized | polarized - won |
| 11 | Oakland | 35.48 | not polarized | not polarized |
| 12 | Oakland | 14.87 | no contest | polarized - won |
| 27 | Genesee | 30.42 | no contest | not polarized |
| 32 | Genesee & Saginaw | 13.45 | no minority candidates | polarized - lost |

The final table in this section, Table 4, summarized the results of my analysis of recent state house election. A number of the cells in the table have "na" as an entry because estimates are not available. This was for one of two reasons: there were too many candidates and too few votes cast to obtain reliable estimates, or there were an insufficient number of white voters to produce reliable estimates (state house districts 3, 7, 8).

It was possible to produce estimates for 54 contests. The majority of these contests were not polarized – in 37 contests (68.5%), white and Black voters supported the same candidates. In another 13 contests, voting was polarized but the candidate preferred by Black voters won. There were four contests – all Democratic primaries – that were racially polarized and the Black-preferred candidate lost. In three of these contests, the BVAP of the districts was less than 30% (Districts 12, 16, and 37). The Black-preferred candidates also lost the 2018 Democratic primary in House District 29, which has a 36.04% BVAP. All six of the candidates competing were African Americans. The plurality choice of Black voters was Kermit Williams; Brenda Carter was the candidate of choice of a majority of white voters. Carter won with 30.7% of the vote and Williams came in second with 24.7% of the vote.

**Def. App. 051a**

**Table 4: Summary of State House District Racial Bloc Voting Analysis**

| State House District | Location | Percent BVAP | 2018 Democratic primary | 2018 General election | 2020 Democratic primary | 2020 General election |
|---|---|---|---|---|---|---|
| 1 | Wayne | 64.76 | not polarized | polarized - won | no contest | polarized - won |
| 2 | Wayne | 57.70 | *na* (7 candidates) | not polarized | not polarized | not polarized |
| 3 | Wayne | 90.93 | *na* | *na* | *na* | *na* |
| 4 | Wayne | 47.27 | *na* (15 candidates) | not polarized | *na* (13 candidates) | not polarized |
| 5 | Wayne | 54.12 | polarized - won | not polarized | not polarized | not polarized |
| 6 | Wayne | 52.86 | *na* (10 candidates) | not polarized | polarized - won | no contest |
| 7 | Wayne | 94.27 | *na* | *na* | *na* | *na* |
| 8 | Wayne | 92.42 | *na* | *na* | *na* | *na* |
| 9 | Wayne | 74.22 | not polarized | not polarized | polarized - won | not polarized |
| 10 | Wayne | 67.41 | not polarized | not polarized | *na* (8 candidates) | not polarized |
| 11 | Wayne | 26.53 | polarized - won | not polarized | no contest | not polarized |
| 12 | Wayne | 26.97 | polarized - lost | polarized - won | not polarized | polarized - won |
| 16 | Wayne | 23.25 | polarized - lost | not polarized | no contest | not polarized |
| 27 | Oakland | 24.35 | not polarized | not polarized | *na* (8 candidates) | not polarized |

**Def. App. 052a**

| State House District | Location | Percent BVAP | 2018 Democratic primary | 2018 General election | 2020 Democratic primary | 2020 General election |
|---|---|---|---|---|---|---|
| 29 | Oakland | 36.04 | polarized - lost | not polarized | no contest | not polarized |
| 35 | Oakland | 62.50 | polarized - won | not polarized | not polarized | not polarized |
| 37 | Oakland | 17.91 | no contest | not polarized | polarized - lost | not polarized |
| 34 | Genesee | 60.96 | not polarized | polarized - won | not polarized | polarized - won |
| 49 | Genesee | 29.47 | not polarized | not polarized | no contest | not polarized |
| 95 | Saginaw | 35.50 | no contest | not polarized | polarized - won | polarized - won |

## D. Voting Patterns of Minority Voters other than Black Voters

As noted above, it was not possible to produce estimates of voting patterns by race for any groups other than Blacks and whites (more specifically, non-Hispanic whites) statewide or by county. However, by localizing the analysis in geographic areas much smaller than counties, it was possible to derive estimates for several additional minority groups: Hispanics, Arab Americans, Chaldeans, and Bangladeshi Americans.[13] Because these estimates could not be generated statewide, it is difficult to know if the voters included in the analysis are representative of the group as a whole statewide. The summary tables reporting the estimates for these groups can be found in the Appendix C.

*Hispanic Voters* Hispanics live in large enough concentrations to produce estimates in two areas of Michigan. Because these concentrations are in different areas of the state, I did not combine them. Instead, I have produced estimates for Hispanics living in the area of Detroit depicted in the first map below ("Areas included in Analysis of Voting Patterns – Hispanics

---

[13] Interest in the voting patterns of Arab Americans, Chaldeans and Bangladeshi Americans was prompted by comments received in public hearings and on the public portal.

(Detroit)") and in the Grand Rapids area depicted in the second map ("Areas included in Analysis of Voting Patterns – Hispanics in Grand Rapids"). In both maps, the precincts are shaded based on the percentage Hispanic in the precinct.[14]

While the voting patterns do not appear to be very different – both groups provide strong support for Democratic candidates in general elections – the turnout levels differ. In the Grand Rapids area, turnout among Hispanics of voting age is lower than it is in the Detroit area.



Areas included in Analysis of Voting Patterns - Hispanics (Detroit)



Areas included in Analysis of Voting Patterns - Hispanics in Grand Rapids

---
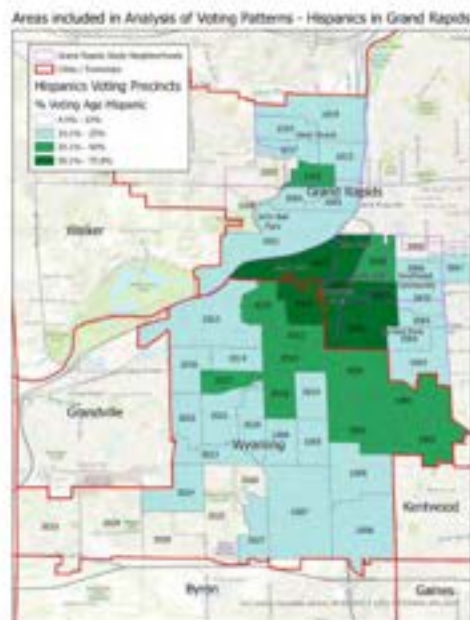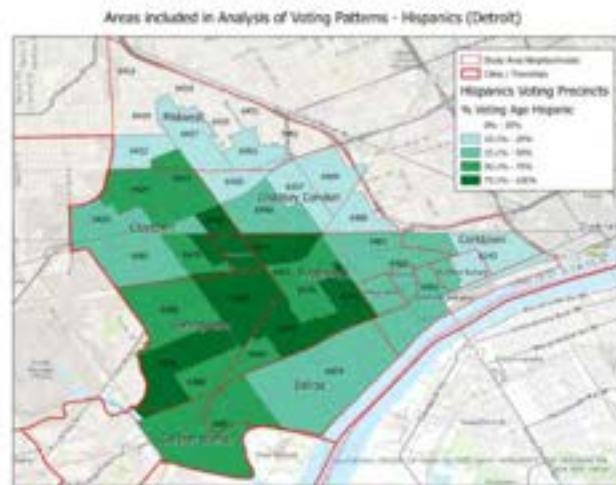
[14] The Hispanic VAP used for shading the map and conducting the racial bloc voting analysis was derived from the 2020 94-171 census redistricting data, which reports Hispanic VAP by census block. This data was then aggregated up to the precinct level.

**Def. App. 054a**

*Arab American Voters* Approximately 38% of the Arab American population in Michigan is concentrated in the Dearborn and Dearborn Heights area. Localizing the racial bloc voting analysis to this specific area offered sufficient variation across the precincts to produce estimates of the voting behavior of this group. The map below indicates the geographic area included in the analysis; the precincts are shaded by the percentage of residents who are Arab American.[15]

Arab Americans voters, at least in this area of Michigan, strongly support Democratic candidates in general elections – over 80% consistently supported the Democratic candidate in the six 2018-2020 general elections examined. These voters, unlike other groups of voters studied, were also very cohesive in 2018 Democratic primary for Governor – they strongly supported of Abdul El-Sayed in his bid for the nomination.



Areas included in Analysis of Voting Patterns - Arabs in Dearborn/Dearborn Heights

---
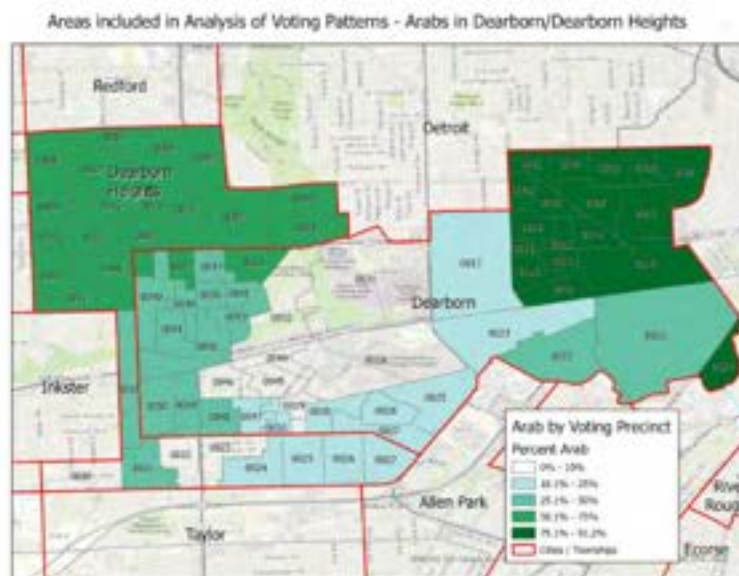
[15] The Arab American data was derived from the U.S. Census Bureau's American Community Survey (ACS), Table B04004, "People Reporting Single Ancestry." This data, reported at the census tract level, was attributed down to the census block level and then aggregated up to the election precinct level.

*Chaldeans,* like Arab Americans in Michigan, tend to reside in a geographically concentrated area of Michigan – in this instance, Sterling Heights. Over 40% of the Chaldean population cand be found here.[16] Localizing the voting analysis to Sterling Heights produced reliable estimates of the voting patterns of this community. Chaldeans are not nearly as cohesive as Arab Americans – they consistently divided their support between the Democratic and Republican candidates. However, a clear majority of Chaldean voters supported Donald Trump in his bid for re-election in 2020.



Areas included in Analysis of Voting Patterns - Chaldeans in Sterling Heights

---
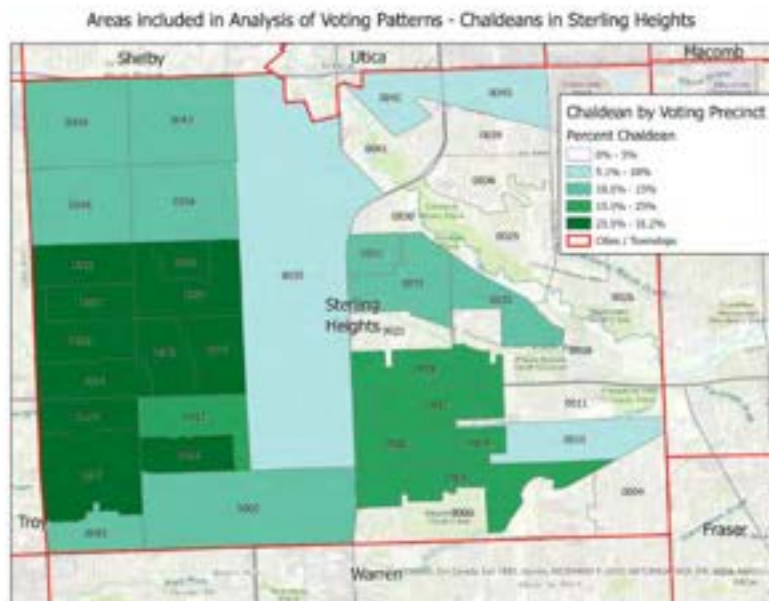
[16] The Chaldean data was derived from the U.S. Census Bureau's American Community Survey (ACS), Table B04004, "People Reporting Single Ancestry" using the Assyrian/Chaldean/Syriac designation. This census tract level data was attributed down to the census block level and then aggregated up to the election precinct level.

*Bangladeshi American Voters* Using a map identifying the Bangladeshi American community of interest submitted to the MICRC,[17] this localized analysis focused on West Warren and Hamtramck to produce estimates of the vote choices of this group. Bangladeshi American voting patterns are very similar to Arab American voting patterns.[18] Both groups provided strong support for Democratic candidates in general elections and both groups were cohesive in their support of Abdul El-Sayed in the 2018 Democratic primary for Governor.



Areas included in Analysis of Voting Patterns - Bengali Language

---
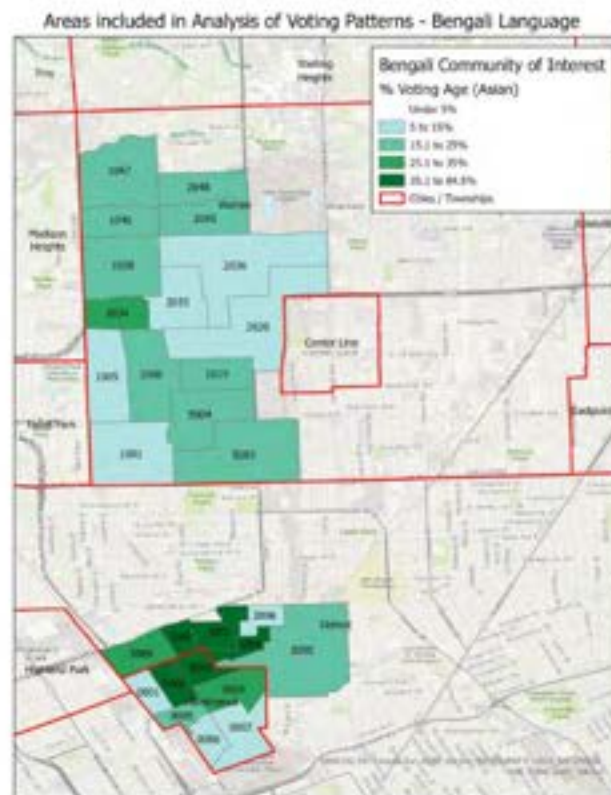
[17] The map was submitted on the public comment portal on 9/8/2021 by Hayg Oshagan with the following comment "This is the Bengali community of SE MI. The area around Hamtramck (to the South) is most densely populated and is the center of the community."

[18] Asian VAP by census block as reported by the 2020 94-171 census redistricting data was used to create the shading on the map and the racial bloc voting database.

## II. Drawing Minority Opportunity Districts

Because voting in Michigan is racially polarized, districts that provide minority voters with an opportunity to elect their candidates of choice must be drawn. If they already exist – as many do in Michigan – they must be maintained. But maintaining minority opportunity districts does not necessarily require that the districts be redrawn with the same percentage minority voting age population. In fact, many of the minority districts in the current plan are packed with far more Black VAP than needed to elect candidates of choice, as indicated by the percentage of votes the minority candidates are garnering. (See Tables 9 and 10, in the next section of this report, for the Black VAP of the current state house and senate districts, the current incumbents and their race and party, and the percentage of votes each of the incumbents received in 2020.)

An analysis must be undertaken to determine if a proposed district is likely to provide minority voters with an opportunity to elect their candidates of choice to office. This analysis must be district-specific – that is, must recognize there are likely to be differences in participation rates and voting patterns in districts across the state – and it must be functional – that is, it must be based on actual voting behavior of whites and minorities. There is no single universal or statewide demographic target that can be applied for Black voters to elect their candidates of choice in Michigan.[19]

There are two related approaches to conducting a district-specific, functional analysis, both of which take into account the relative turnout rates and voting patterns of minorities and whites. The first approach uses estimates derived from racial bloc voting analysis to calculate the percent minority population needed in a specific area for minority-preferred candidates to win a district in that area.

The second approach relies on election results from previous contests that included minority-preferred candidates (as identified by the racial bloc voting analysis) to determine if these candidates would win election in the proposed districts. The election results for these "bellwether elections" – racially polarized elections that include minority candidates who are preferred by minority voters – are disaggregated down from the election precinct to the census block level and then recompiled to reflect the boundaries of the proposed district. If the minority-

---

[19] Establishing a demographic target (e.g., 55% black voting age population) for all minority districts across the jurisdiction was, in fact, expressly forbidden by the U.S. Supreme Court in *Alabama Legislative Black Caucus v. Alabama*, 575 U.S. 254 (2015).

preferred candidates in these bellwether elections win in the proposed district, this district is likely to provide minority voters with an opportunity to elect their candidates of choice. This latter approach can be used only if proposed district boundaries have been drawn. The former approach can be carried out before any new boundaries are drafted.

### A. Calculating the Black VAP Needed to Elect Black-Preferred Candidates

The percentage of minority voting age population needed in a district to provide minority voters with the opportunity to elect minority-preferred candidates to congress or to the state legislature varies. Using the estimates produced from the racial bloc voting analysis, I calculated the Black VAP percentages needed to elect minority-preferred candidates in each of the general elections included in the summary tables in the Appendix. This calculation takes into account the relative participation rates of age eligible Blacks and whites, as well as the level of Black support for the Black-preferred candidate (the "cohesiveness" of Black voters), and the level of whites "crossing over" to vote for the Black-preferred candidate.

*Equalizing minority and white turnout* Because Blacks who are age eligible to vote often turn out to vote at lower rates than white voters in Michigan, the Black VAP needed to ensure that Black voters comprise at least half of the voters in an election is often higher than 50%. Once the respective turnout rates of Black and Whites eligible to vote have been estimated using the statistical techniques described above (HP, ER and EI), the percentage needed to equalize Black and white voters can be calculated mathematically.[20] But equalizing turnout is

---

[20] The equalizing percentage is calculated mathematically by solving the following equation:

Let

| | |
|---|---|
| M | = the proportion of the district's voting age population that is Black |
| W = 1-M | = the proportion of the district's voting age population that is white |
| A | = the proportion of the Black voting age population that turned out to vote |
| B | = the proportion of the white voting age population that turned out to vote |

Therefore,

M(A) = the proportion of the population that is Black and turned out to vote (1)

(1-M)B = the proportion of total population that is white and turned out to vote (2)

To find the value of M that is needed for (1) and (2) to be equal, (1) and (2) are set as equal and we solve for M algebraically:

$$M(A) = (1 - M) B$$
$$M(A) = B - M(B)$$
$$M(A) + M(B) = B$$
$$M(A + B) = B$$
$$M = B/(A+B)$$

only the first step in the process – it does not take into account the voting patterns of Black and white voters. If voting is racially polarized but a significant number of white voters typically "crossover" to vote for Black voters' preferred candidate, it may be the case that crossover voting can more than compensate for depressed Black turnout.

***Incorporating Minority Cohesion and White Crossover Voting*** Even if Black citizens are turning out at lower rates than whites, and voting is racially polarized, if a relatively consistent percentage of white voters support Black-preferred candidates, the candidates preferred by Black voters can be elected in districts that are less than majority Black. On the other hand, if voting is starkly polarized, with few or no whites crossing over to vote for the candidates supported by Black voters, it may be the case that a district that is more than 50% Black VAP is needed to elect Black-preferred candidates. A district-specific, functional analysis should take into account not only differences in turnout rates, but also the voting patterns of Black and white voters.[21]

To illustrate this mathematically, consider a district that has 1000 persons of voting age, 50% of who are Black and 50% of who are white. Let us begin by assuming that Black turnout is lower than white turnout in a two-candidate general election. In our hypothetical election example, 42% of the Black VAP turn out to vote and 60% of the white VAP vote. This means that, for our illustrative election, there are 210 Black voters and 300 white voters. Further suppose that 96% of the Black voters supported their candidate of choice and 25% of the white voters cast their votes for this candidate (with the other 75% supporting her opponent in the election contest). Thus, in our example, Black voters cast 200 of their 210 votes for the Black-preferred candidate and their other 8 votes for her opponent; white voters cast 75 of their 300 votes for the Black-preferred candidate and 225 votes for their preferred candidate:

---

Thus, for example, if 39.3% of the Black population turned out and 48.3% of the white population turned out, B= .483 and A = .393, and M = .483/ (.393+.483) = .483/.876 = .5513, therefore a Black VAP of 55.1% would produce an equal number of Black and white voters. (For a more in-depth discussion of equalizing turnout see Kimball Brace, Bernard Grofman, Lisa Handley and Richard Niemi, "Minority Voting Equality: The 65 Percent Rule in Theory and Practice," *Law and Policy*, 10 (1), January 1988.)

[21] For an in-depth discussion of this approach to creating effective minority districts, see Bernard Grofman, Lisa Handley and David Lublin, "Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence," *North Carolina Law Review*, volume 79 (5), June 2001.

| | VAP | turnout | voters | support for Black-preferred candidate | votes for Black-preferred candidate | support for white-preferred candidate | votes for white-preferred candidate |
|---|---|---|---|---|---|---|---|
| Black | 500 | 0.42 | 210 | 0.96 | 202 | 0.04 | 8 |
| White | 500 | 0.60 | 300 | 0.25 | 75 | 0.75 | 225 |
| | | | 510 | | 277 | | 233 |

The candidate of choice of Black voters would receive a total of 277 votes (202 from Black voters and 75 from white voters), while the candidate preferred by white voters would receive only 233 votes (8 from Black voters and 225 from white voters). The Black-preferred candidate would win the election with 55.4% (277/500) of the vote in this hypothetical 50% Black VAP district. And the Black-preferred candidate would be successful despite the fact that the election was racially polarized and that Blacks turned out to vote at a lower rate than whites.

The candidate of choice of Black voters would still win the election by a very small margin (50.9%) in a district that is 45% Black with these same voting patterns:

| | VAP | turnout | voters | support for Black-preferred candidate | votes for Black-preferred candidate | support for white-preferred candidate | votes for white-preferred candidate |
|---|---|---|---|---|---|---|---|
| Black | 450 | 0.42 | 189 | 0.96 | 181 | 0.04 | 8 |
| White | 550 | 0.60 | 330 | 0.25 | 83 | 0.75 | 248 |
| | | | 519 | | 264 | | 255 |

In a district with a 40% BVAP, however, the Black-preferred candidate would garner only 47.5% of the vote in this example.

***Percent Black VAP needed to win recent general elections in Michigan Counties***

Tables 5, 6, 7, and 8 utilize the results of the racial bloc voting analysis (see Appendix A) to indicate the percentage of vote a Black-preferred candidate would receive, given the turnout rates of Blacks and whites and the degree of black cohesion and white crossover voting for each

general election contests examined, in a 55%, 50%, 45%, 40% and 35% BVAP district in Wayne, Oakland, Genesee, and Saginaw Counties.[22]  Because voting patterns vary by county, the percentage of votes the Black-preferred candidates would receive also varies. However, in no county is a 50% BVAP district required for the Black-preferred candidates to carry the district in a general election.

Table 5 reports the percentage of votes the Black-preferred candidate would receive in Wayne County, given voting patterns in previous general elections, The Black-preferred candidate would win every general election in a district with a BVAP of 35% or more, and would win with at least 54.4% of the vote – and in most election contests, a substantially higher percentage of the vote. The variation in the percentage of votes received by the Black-preferred candidate is due to the variation in the white vote rather than the Black vote because in in every election contest considered at least 95% of Black voters supported the Black-preferred candidate. The Black-preferred candidate of choice who would receive the lowest percentage of the vote would be African American Godfrey Dillard, a candidate for Secretary of State in 2014.

The voting patterns by race, and therefore the percent BVAP needed to win general elections is very similar in Genesee County, as shown in Table 6. Unlike Wayne County, however, the percentage of vote the Black-preferred candidate would garner in a 35% BVAP district in this county is declining slightly over the course of the decade – although the Black-preferred candidate would still win every general election in a 35% BVAP district.

In Oakland County, the Black-preferred candidate does not win every general election contest in a 35% BVAP district. It is not until the 40% BVAP column in Table 7 that the candidate of choice of Black voters wins every election examined. The most challenging election is again the race for Secretary of State in 2014. And even at 40% BVAP, Dillard would receive only 51.3% of the vote.

Saginaw County (Table 8) is similar to Oakland County in that it is only at 40% that the Black-preferred candidate wins every general election contest – and at 40% a couple of the contests are very close. Not only are the winning percentages for the Black-preferred candidates consistently lower in Saginaw County than they are for Oakland County, they have been decreasing over the course of the decade.

---

[22] Tables 5, 6, 7, and 8 are generated using EI RxC estimates reported in the racial bloc voting tables in the Appendix.

**Table 5: Percent BVAP Needed to Win, Wayne County**

| WAYNE COUNTY Percent Black VAP needed to win | race of B-P candidate | turnout rate for office and percent vote for black-preferred candidates | | | | | | percent of vote B-P cand would have received if district was 55% black VAP | percent of vote B-P cand would have received if district was 50% black VAP | percent of vote B-P cand would have received if district was 45% black VAP | percent of vote B-P cand would have received if district was 40% black VAP | percent of vote B-P cand would have received if district was 35% black VAP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Black votes | | | White votes | | | | | | | |
| | | votes cast for office | B-P | all others | votes cast for office | B-P | all others | | | | | |
| GENERAL ELECTIONS | | | | | | | | | | | | |
| 2020 President | W | 58.0 | 97.5 | 2.5 | 76.6 | 47.5 | 52.5 | 71.5 | 69.0 | 66.6 | 64.3 | 62.0 |
| 2020 US Senate | W | 57.8 | 95.2 | 4.8 | 75.6 | 47.2 | 52.8 | 70.4 | 68.0 | 65.7 | 63.4 | 61.2 |
| 2018 Governor | W | 33.2 | 97.0 | 3.0 | 63.2 | 53.5 | 46.5 | 70.5 | 68.5 | 66.6 | 64.8 | 63.1 |
| 2018 Secretary of State | W | 33.1 | 97.0 | 3.0 | 62.2 | 53.6 | 46.4 | 70.7 | 68.7 | 66.8 | 65.0 | 63.3 |
| 2018 Attorney General | W | 32.7 | 95.5 | 4.5 | 61.3 | 49.4 | 50.6 | 67.6 | 65.4 | 63.4 | 61.5 | 59.7 |
| 2018 US Senate | W | 33.1 | 95.8 | 4.2 | 63.1 | 52.3 | 47.7 | 69.3 | 67.3 | 65.4 | 63.6 | 61.9 |
| 2016 President | W | 57.0 | 98.4 | 1.6 | 64.0 | 39.7 | 60.3 | 70.3 | 67.4 | 64.4 | 61.6 | 58.7 |
| 2014 Governor | W | 35.8 | 96.5 | 3.5 | 47.7 | 41.3 | 58.7 | 67.7 | 65.0 | 62.3 | 59.7 | 57.2 |
| 2014 Secretary of State | AA | 35.5 | 96.8 | 3.2 | 46.1 | 36.8 | 63.2 | 65.9 | 62.9 | 60.0 | 57.2 | 54.4 |
| 2014 Attorney General | W | 35.3 | 95.7 | 4.3 | 45.9 | 41.0 | 59.0 | 67.5 | 64.8 | 62.1 | 59.5 | 57.0 |
| 2014 US Senate | W | 35.7 | 98.0 | 2.0 | 46.8 | 53.4 | 46.6 | 74.9 | 72.7 | 70.5 | 68.4 | 66.4 |
| 2012 President | AA | 60.4 | 99.0 | 1.0 | 65.7 | 51.9 | 48.1 | 76.8 | 74.5 | 72.1 | 69.8 | 67.5 |
| 2012 US Senate | W | 59.9 | 98.1 | 1.9 | 64.4 | 57.6 | 42.4 | 79.1 | 77.1 | 75.1 | 73.1 | 71.1 |

**Table 6: Percent BVAP Needed to Win, Genesee County**

| GENESEE COUNTY Percent Black VAP needed to win | race of B-P candidate | turnout rate for office and percent vote for black-preferred candidates | | | | | | percent of vote B-P cand would have received if district was 55% black VAP | percent of vote B-P cand would have received if district was 50% black VAP | percent of vote B-P cand would have received if district was 45% black VAP | percent of vote B-P cand would have received if district was 40% black VAP | percent of vote B-P cand would have received if district was 35% black VAP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Black votes | | | White votes | | | | | | | |
| | | votes cast for office | B-P | all others | votes cast for office | B-P | all others | | | | | |
| GENERAL ELECTIONS | | | | | | | | | | | | |
| 2020 President | W | 53.0 | 96.1 | 3.9 | 79.6 | 42.1 | 57.9 | 66.3 | 63.7 | 61.1 | 58.7 | 56.4 |
| 2020 US Senate | W | 56.6 | 95.0 | 5.0 | 78.7 | 43.5 | 56.5 | 67.6 | 65.0 | 62.6 | 60.2 | 57.9 |
| 2018 Governor | W | 45.1 | 95.3 | 4.7 | 59.8 | 46.2 | 53.8 | 69.8 | 67.3 | 64.9 | 62.6 | 60.4 |
| 2018 Secretary of State | W | 44.9 | 95.2 | 4.8 | 58.6 | 48.0 | 52.0 | 70.8 | 68.5 | 66.2 | 64.0 | 61.8 |
| 2018 Attorney General | W | 44.8 | 94.1 | 5.9 | 58.4 | 41.1 | 58.9 | 66.7 | 64.0 | 61.5 | 59.0 | 56.5 |
| 2018 US Senate | W | 45.1 | 95.2 | 4.8 | 59.6 | 45.8 | 54.2 | 69.5 | 67.1 | 64.7 | 62.4 | 60.1 |
| 2016 President | W | 59.0 | 96.4 | 3.6 | 67.3 | 37.4 | 62.6 | 67.9 | 65.0 | 62.0 | 59.2 | 56.3 |
| 2014 Governor | W | 35.8 | 95.8 | 4.2 | 47.5 | 51.8 | 48.2 | 72.9 | 70.7 | 68.6 | 66.5 | 64.5 |
| 2014 Secretary of State | AA | 35.9 | 95.6 | 4.4 | 46.1 | 46.2 | 53.8 | 70.3 | 67.8 | 65.4 | 63.1 | 60.8 |
| 2014 Attorney General | W | 35.9 | 95.6 | 4.4 | 45.5 | 45.2 | 54.8 | 69.9 | 67.4 | 65.0 | 62.6 | 60.2 |
| 2014 US Senate | W | 36.1 | 95.6 | 4.4 | 47.1 | 58.6 | 41.4 | 76.5 | 74.7 | 72.9 | 71.1 | 69.4 |
| 2012 President | AA | 61.0 | 97.6 | 2.4 | 68.4 | 53.7 | 46.3 | 76.6 | 74.4 | 72.2 | 70.1 | 67.9 |
| 2012 US Senate | W | 60.7 | 96.7 | 3.3 | 67.5 | 60.2 | 39.8 | 79.3 | 77.5 | 75.7 | 73.9 | 72.1 |

## Table 7: Percent BVAP Needed to Win, Oakland County

| OAKLAND COUNTY Percent Black VAP needed to win | race of B-P candidate | turnout rate for office and percent vote for black-preferred candidates | | | | | | percent of vote B-P cand would have received if district was 55% black VAP | percent of vote B-P cand would have received if district was 50% black VAP | percent of vote B-P cand would have received if district was 45% black VAP | percent of vote B-P cand would have received if district was 40% black VAP | percent of vote B-P cand would have received if district was 35% black VAP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Black votes | | | White votes | | | | | | | |
| | | votes cast for office | B-P | all others | votes cast for office | B-P | all others | | | | | |
| GENERAL ELECTIONS | | | | | | | | | | | | |
| 2020 President | W | 71.6 | 93.4 | 6.6 | 86.4 | 45.9 | 54.1 | 69.8 | 67.4 | 65.1 | 62.8 | 60.6 |
| 2020 US Senate | W | 71.4 | 92.1 | 7.9 | 85.4 | 43.5 | 56.5 | 68.1 | 65.6 | 63.2 | 60.9 | 58.6 |
| 2018 Governor | W | 53.2 | 94.1 | 5.9 | 68.8 | 47.4 | 52.6 | 70.1 | 67.8 | 65.5 | 63.3 | 61.1 |
| 2018 Secretary of State | W | 53.1 | 94.2 | 5.8 | 67.7 | 47.5 | 52.5 | 70.4 | 68.0 | 65.8 | 63.5 | 61.4 |
| 2018 Attorney General | W | 52.5 | 93.8 | 6.2 | 67.0 | 43.0 | 57.0 | 67.9 | 65.3 | 62.8 | 60.4 | 58.1 |
| 2018 US Senate | W | 53.2 | 93.0 | 7.0 | 68.7 | 45.5 | 54.5 | 68.6 | 66.2 | 63.9 | 61.7 | 59.5 |
| 2016 President | W | 65.6 | 95.1 | 4.9 | 73.5 | 39.1 | 60.9 | 68.3 | 65.5 | 62.7 | 60.0 | 57.3 |
| 2014 Governor | W | 46.3 | 94.8 | 5.2 | 54.6 | 30.6 | 69.4 | 63.3 | 60.1 | 56.9 | 53.8 | 50.7 |
| 2014 Secretary of State | AA | 45.9 | 94.6 | 5.4 | 53.1 | 26.4 | 73.6 | 61.4 | 58.0 | 54.7 | 51.3 | 48.1 |
| 2014 Attorney General | W | 45.8 | 94.1 | 5.9 | 52.6 | 32.9 | 67.1 | 64.5 | 61.4 | 58.4 | 55.4 | 52.4 |
| 2014 US Senate | W | 46.5 | 95.0 | 5.0 | 53.7 | 46.7 | 53.3 | 71.5 | 69.1 | 66.7 | 64.4 | 62.1 |
| 2012 President | AA | 68.9 | 95.7 | 4.3 | 75.7 | 42.1 | 57.9 | 70.3 | 67.6 | 65.0 | 62.3 | 59.7 |
| 2012 US Senate | W | 67.8 | 95.8 | 4.2 | 74.0 | 47.6 | 52.4 | 73.1 | 70.6 | 68.3 | 65.9 | 63.5 |

## Table 8: Percent BVAP Needed to Win, Saginaw County

| SAGINAW COUNTY Percent Black VAP needed to win | race of B-P candidate | turnout rate for office and percent vote for black-preferred candidates | | | | | | percent of vote B-P cand would have received if district was 55% black VAP | percent of vote B-P cand would have received if district was 50% black VAP | percent of vote B-P cand would have received if district was 45% black VAP | percent of vote B-P cand would have received if district was 40% black VAP | percent of vote B-P cand would have received if district was 35% black VAP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Black votes | | | White votes | | | | | | | |
| | | votes cast for office | B-P | all others | votes cast for office | B-P | all others | | | | | |
| GENERAL ELECTIONS | | | | | | | | | | | | |
| 2020 President | W | 48.6 | 95.3 | 4.7 | 79.6 | 36.3 | 63.7 | 61.5 | 58.7 | 56.0 | 53.4 | 50.9 |
| 2020 US Senate | W | 48.4 | 93.8 | 6.2 | 78.7 | 37.5 | 62.5 | 61.7 | 58.9 | 56.3 | 53.9 | 51.5 |
| 2018 Governor | W | 37.7 | 93.6 | 6.4 | 63.0 | 40.9 | 59.1 | 63.2 | 60.6 | 58.2 | 55.9 | 53.7 |
| 2018 Secretary of State | W | 38.0 | 93.7 | 6.3 | 61.4 | 39.2 | 60.8 | 62.7 | 60.0 | 57.5 | 55.1 | 52.8 |
| 2018 Attorney General | W | 37.6 | 93.4 | 6.6 | 61.0 | 33.3 | 66.7 | 59.1 | 56.2 | 53.4 | 50.8 | 48.3 |
| 2018 US Senate | W | 37.8 | 93.5 | 6.5 | 62.8 | 39.3 | 60.7 | 62.3 | 59.7 | 57.2 | 54.8 | 52.6 |
| 2016 President | W | 52.3 | 95.0 | 5.0 | 70.2 | 30.6 | 69.4 | 61.3 | 58.1 | 55.0 | 52.0 | 49.0 |
| 2014 Governor | W | 32.7 | 94.1 | 5.9 | 50.8 | 42.2 | 57.8 | 65.1 | 62.5 | 60.1 | 57.8 | 55.6 |
| 2014 Secretary of State | AA | 32.6 | 94.4 | 5.6 | 49.2 | 36.3 | 63.7 | 62.3 | 59.5 | 56.7 | 54.1 | 51.6 |
| 2014 Attorney General | W | 32.4 | 94.1 | 5.9 | 50.1 | 32.6 | 67.4 | 59.8 | 56.8 | 53.9 | 51.1 | 48.5 |
| 2014 US Senate | W | 32.7 | 94.1 | 5.9 | 50.1 | 50.6 | 49.4 | 69.9 | 67.8 | 65.7 | 63.8 | 61.9 |
| 2012 President | AA | 56.2 | 95.7 | 4.3 | 70.3 | 42.9 | 57.1 | 69.0 | 66.4 | 63.8 | 61.3 | 58.8 |
| 2012 US Senate | W | 55.7 | 95.4 | 4.6 | 68.7 | 52.3 | 47.7 | 73.8 | 71.6 | 69.5 | 67.4 | 65.4 |

It is important to remember that winning office in the United States usually requires winning two elections: a primary and a general election. The tables above consider only general election contests. Producing a comparable set of tables for Democratic primaries is not possible. First, there was only one statewide Democratic primary – the 2018 primary contest for Governor. There were three candidates competing in this election and because 50% of the vote was not required to win the election, a mathematical equation setting the percentage needed to win 50% of the vote does not work. Second, Black voters were not cohesive in support of any one of these three candidates. In fact, the candidate preferred by even the plurality of Black voters was not the same in the four counties examined. Drawing a district that Black-preferred candidate could win this primary is not possible when there is no Black-preferred candidate.

In areas where most of the white voters are likely to vote in Republican primaries, the inability to calculate the percent needed to win in Democratic primaries is not particularly important. Black voters will dominate the Democratic primary unless they make up only a very small portion of the voters in the district. However, in the counties examined in Michigan, many white voters elect to participate in the Democratic primary, especially in Wayne County. As the percentage Black VAP of proposed districts decreases, it may become more challenging for Black-preferred candidates to win not only the general election but the Democratic primary – but only if voting in Democratic primaries is racially polarized. Unfortunately, it is not possible to ascertain exactly how much more difficult it would be – or even if it would be more difficult – given the lack of Democratic primary election data.

### B. Threshold of Representation in the Current State House and Senate Districts

A useful check on the percent needed to win estimates found in Tables 5-8 that can be done prior to drawing any districts is to produce what have been referred to by some political scientists as "threshold of representation" tables. These tables are designed to identify the lowest minority percentage above which minority candidates are consistently elected. Tables 9 and 10, below, report the BVAP of the current Michigan state house and senate districts with over 20% BVAP, and indicate the race and party of the candidate elected to represent the district.[23] Sorted

---

[23] There are no African American state senators or representatives elected from districts that are less than 20% Black in VAP. However, there are other minority candidates (Hispanic, Asian, and Middle Eastern) elected to state house districts with considerably less than 20% BVAP.

by the percent BVAP, the tables can sometimes provide evidence of a clear breakpoint between those districts that are probably electing candidates of choice and those that are not.[24]

An examination Table 9 indicates that every Michigan state house district with a BVAP of at least 35% elects a minority representative to the state house. In fact, every district with a BVAP of more than 26.53% elects a minority to office with the exception of District 49 in Genesee County. And the racial bloc voting analysis of House District 49 indicates that the white incumbent, John Cherry, is the candidate of choice of Black voters, even in the 2018 Democratic primary when he faced several African American candidates.

**Table 9: Threshold of Representation for State House Districts, 2021**

| State House District | Total VAP | Black VAP | Percent Black VAP | Name | Party | Race | Percent of Vote 2020 |
|---|---|---|---|---|---|---|---|
| 7 | 60347 | 57256 | 94.27% | Helena Scott | D | Black | 93.00% |
| 8 | 62448 | 58042 | 92.42% | Stephanie A. Young | D | Black | 96.70% |
| 3 | 54130 | 49536 | 90.93% | Shri Thanedar | D | Asian | 93.30% |
| 9 | 62529 | 46806 | 74.22% | Karen Whitsett | D | Black | 94.20% |
| 10 | 69209 | 46977 | 67.41% | Mary Cavanagh | D | Hispanic | 84.80% |
| 1 | 59788 | 38993 | 64.76% | Tenisha R. Yancey | D | Black | 75.80% |
| 35 | 78306 | 49325 | 62.50% | Kyra Harris Bolden | D | Black | 82.90% |
| 34 | 49491 | 30419 | 60.96% | Cynthia R. Neeley | D | Black | 86.70% |
| 2 | 57031 | 33142 | 57.70% | Joe Tate | D | Black | 74.10% |
| 5 | 49290 | 27190 | 54.12% | Cynthia A. Johnson | D | Black | 93.40% |
| 6 | 67505 | 36182 | 52.86% | Tyrone Carter | D | Black | 100.00% |
| 4 | 68749 | 32761 | 47.27% | Abraham Aiyash | D | ME | 89.80% |
| 29 | 72319 | 26621 | 36.04% | Brenda Carter | D | Black | 72.90% |
| 95 | 58640 | 21320 | 35.50% | Amos O'Neal | D | Black | 70.10% |
| 49 | 64844 | 19308 | 29.47% | John D. Cherry | D | White | 68.90% |
| 54 | 72426 | 21212 | 28.79% | Ronnie Peterson | D | Black | 77.70% |
| 12 | 73883 | 20207 | 26.97% | Alex Garza | D | Hispanic | 62.40% |
| 11 | 73586 | 19760 | 26.53% | Jewell Jones | D | Black | 65.20% |
| 92 | 66135 | 16957 | 25.34% | Terry J. Sabo | D | White | 65.30% |
| 27 | 73337 | 18051 | 24.35% | Regina Weiss | D | White | 74.40% |
| 16 | 74617 | 17556 | 23.25% | Kevin Coleman | D | White | 62.50% |
| 75 | 76956 | 18127 | 22.56% | David LaGrand | D | White | 74.60% |
| 68 | 71672 | 16808 | 22.44% | Sarah Anthony | D | Black | 75.90% |
| 18 | 75251 | 16519 | 21.76% | Kevin Hertel | D | White | 60.30% |
| 22 | 68758 | 14588 | 21.00% | Richard Steenland | D | White | 59.90% |
| 60 | 74176 | 15887 | 20.97% | Julie M. Rogers | D | White | 71.40% |

[24] Without the confirmation provided by a racial bloc voting analysis, it could conceivably be the case that the minority legislator is not the candidate of choice of minority voters.

Interpreting Table 10, for the Michigan state senate, is less straightforward. The four districts with BVAP percentages over 47% elect African Americans to office. However, Stephanie Chang, the state senator in District 1, which is 44.68% BVAP, was not the candidate of choice of Black voters in the 2018 Democratic primary, though she is the candidate of choice in the general election.

**Table 10: Threshold of Representation for State Senate Districts, 2021**

| State Senate District | Total VAP | Black VAP | Percent Black VAP | Name | party | race | Percent of vote 2018 |
|---|---|---|---|---|---|---|---|
| 5 | 203828 | 111418 | 54.25% | Betty Alexander | D | Black | 77.4% |
| 2 | 169357 | 86961 | 50.82% | Adam Hollier | D | Black | 75.7% |
| 3 | 186758 | 90737 | 48.14% | Sylvia Santana | D | Black | 81.8% |
| 4 | 180199 | 85691 | 47.00% | Marshall Bullock | D | Black | 78.3% |
| 1 | 193087 | 87075 | 44.68% | Stephanie Chang | D | Asian | 72.0% |
| 11 | 229870 | 82336 | 35.48% | Jeremy Moss | D | White | 76.7% |
| 27 | 175918 | 54071 | 30.42% | Jim Ananich | D | White | 71.2% |
| 9 | 219325 | 50800 | 22.95% | Paul Wojno | D | White | 65.9% |
| 6 | 217734 | 46997 | 21.29% | Erika Geiss | D | Black | 61.4% |

## C. Recompiled Election Results

As noted above, once draft districts have been drawn, there is a second approach available for ascertaining whether a proposed district is likely to provide minority voters with an opportunity to elect their candidates of choice to legislative or congressional office. This approach relies on recompiling election results from previous elections to see if the candidates preferred by minority voters would win in the draft district. This process entails (1) identifying "bellwether" elections, (2) disaggregating the precinct level results for these elections down to the census block level and then (3) re-aggregating the results up to conform to proposed district boundaries to determine if the minority-preferred candidate would win. This recompilation can only be done

for elections that cover a broad enough area to encompass all of the draft districts, hence only statewide elections can be used for this exercise. "Bellwether" elections are statewide elections that included minority candidates who were the candidates of choice of minority voters but were not supported by white voters.

Although there were six statewide general elections that included African American candidates or running mates, the African American was the candidate of choice of Black voters in only four of these contests: U.S. President in 2012 and 2020, Secretary of State in 2014, and Governor in 2018. All of these contests were racially polarized statewide, but only the 2014 Secretary of State contest was polarized in all four counties. This election contest was also the contest in which the candidate strongly preferred by Black voters garnered the least amount of white crossover votes. Thus, while recompiled elections results for all four elections provide important information for determining if a proposed district would provide Black voters with an opportunity to elect their preferred candidates in general elections, the single best "bellwether" contest for that purpose is the vote for Godfrey Dillard in 2014.

The redistricting software used by MICRC automatically included recompiled election results for all draft districts for all four of these elections – in fact, it included this information for every statewide general election conducted between 2012 and 2020. Ascertaining if the African American candidates of choice of Black voters, especially Dillard in 2014, carried a proposed district provides evidence that the proposed district in a draft plan will provide Black voters with an opportunity to elect their candidates of choice in general elections.

The redistricting software also reported recompiled election results for the one statewide Democratic primary conducted in the past decade: the 2018 race for Governor. However, because there were three candidates and because Black voters were not cohesive in supporting any of these candidates, these recompiled results are not particularly useful in ascertaining whether a proposed district would provide minority voters with an opportunity to elect their preferred candidates in Democratic primaries.

### III. Measuring Partisan Fairness in Redistricting Plans

According to 13(d) of Article IV, Section 6 of the Michigan State Constitution: "Districts shall not provide a disproportionate advantage to any political party. A disproportionate advantage to a political party shall be determined using accepted measures of partisan fairness." A number of objective mathematical measures have been developed by social scientists and mathematicians to determine if an existing or proposed redistricting map disadvantages one political party relative to the other. Using these measures, we can compare an existing or proposed redistricting map to a large set of other possible maps to determine if the proposed map exhibits more or less political bias. The maps used for comparative purposes can be previous redistricting maps used in the state, or the redistricting maps of other states, or they can be computer simulated maps.

I proposed incorporating three measures of partisan fairness measures into the redistricting software used by the MICRC to draw redistricting maps. The reasons for my choice were as follows:

- The measures are easy to understand and straightforward to calculate. They produce scores that indicate both the direction and the magnitude of any political bias in the redistricting map.

- Because I easily calculated the scores for each of these measures in excel, I knew it would be possible to incorporate an automated report function into the redistricting software that could provide these scores for any draft plans drawn.

- Although these three measures have only recently been developed, they have all have been introduced and accepted by federal and state courts as useful tools for determining if a redistricting map is politically fair.

The three partisan fairness measures I selected are the lopsided margins test, the mean-median difference, and the efficiency gap.

In addition to these three measures, a simple metric for indicating whether a redistricting plan is fair is to compare the proportion of the statewide vote each party receives to the proportion of the districts each party wins or is likely to win under the proposed plan. The proportionality of a redistricting plan is calculated by subtracting the percentage of votes won by the party from the percentage of seats that party won (or would win) in congressional and state

legislative elections. So, for example, if Party A won 52.3% of the vote statewide but only won 44.7% of the seats in the state senate, the proportionality bias would be 44.7 – 52.3 or -7.6 in favor of Party B.

Each of these measures use historical election results to evaluate the partisan fairness of redistricting plans. However, in the case of proposed districts, previous election results must be reconfigured to conform to the proposed district boundaries to evaluate the partisan fairness of the proposed plans.[25] A composite election index was constructed using the statewide general elections between 2012 and 2020 – all 13 of the election contests included in the GIS redistricting database and analyzed in the racial bloc voting analysis. The composite index was weighted to give each election cycle equal weight in the index. However, the partisan fairness report function in the redistricting software was designed so that any of the individual 13 elections could be substituted for the composite index in calculating the partisan fairness scores.

## A. Lopsided Margins Test

In a perfectly fair plan – at least in a state in which the two political parties are competitive (closely divided) – we would expect a mix of districts, some strongly partisan districts, some moderately reliable districts, and some tossups – but each party would have a roughly similar mix. If one party has a smaller number of victories with larger margins of victory that the other party, this is an indication that one party is being disfavored over the other in the map. This pattern of outcomes can be quantified by sorting the districts into two groups, by winning party. Each party's winning vote share can then be compared to see if one party has significantly higher margin of victories than the other.[26] The following is an example of how this is calculated:

---

[25] Both the efficiency gap and the mean-median difference have been used to evaluate computer simulated alternative redistricting maps for comparative purposes in partisan gerrymandering challenges. Election results for select statewide elections were reconfigured to determine how the candidates in these elections would have fared in the alternative districts.

[26] This measure was first discussed in Sam Wang, "Three Tests for Practical Evaluation of Partisan Gerrymandering," *Stanford Law Journal*, 16, June 2016. Available at: https://www.stanfordlawreview.org/print/article/three-tests-for-practical-evaluation-of-partisan-gerrymandering/)

| District | Party A | Party B | Total Votes | Percent of Votes | | Party Wins | |
|---|---|---|---|---|---|---|---|
| | | | | Party A | Party B | Party A | Party B |
| 1 | 279 | 120 | 399 | 69.9% | 30.1% | 69.9% | |
| 2 | 172 | 198 | 370 | 46.5% | 53.5% | | 53.5% |
| 3 | 167 | 192 | 359 | 46.5% | 53.5% | | 53.5% |
| 4 | 148 | 212 | 360 | 41.1% | 58.9% | | 58.9% |
| 5 | 185 | 180 | 365 | 50.7% | 49.3% | 50.7% | |
| 6 | 139 | 193 | 332 | 41.9% | 58.1% | | 58.1% |
| 7 | 169 | 201 | 370 | 45.7% | 54.3% | | 54.3% |
| 8 | 179 | 206 | 385 | 46.5% | 53.5% | | 53.5% |
| 9 | 234 | 99 | 333 | 70.3% | 29.7% | 70.3% | |
| 10 | 178 | 199 | 377 | 47.2% | 52.8% | | 52.8% |
| TOTAL | 1850 | 1800 | 3650 | 50.7% | 49.3% | 63.6% | 54.9% |

Party A in the example is winning districts with a much higher average vote (63.6%) than Party B (54.9%) – and the difference between the two percentages is 8.7 (63.6 – 54.9). This indicates that Party A supporters are packed into a few districts that it wins by large margins. Party B, on the other hand, is winning substantially more districts with substantially lower vote margins.

## B. Mean-Median Difference

Comparing a dataset's mean and median is a common statistical analysis used to assess how skewed the dataset is – if the dataset is balanced, the mean will be very close in value to its median. As a dataset becomes more skewed, the mean and median begin to diverge; looking at the difference between the two can be used determine the extent to which the data is skewed.

Based on this principle, the mean-median district vote share difference compares a party's mean district vote share to its median district vote share:[27]

- Mean = average party vote share across all districts
- Median = party vote share in the median district when districts are sorted on share of party vote

---

[27] This approach to ascertaining political bias in redistricting maps was proposed by Michael D. McDonald and Robin Best in "Unfair Partisan Gerrymanders in Politics and Law: A Diagnostic Applied to Six Cases," *Election Law Journal* 14(4), 2015 (available at: https://www.liebertpub.com/doi/abs/10.1089/elj.2015.0358). It was further quantified by Wang (see full citation above).

The difference between the mean and median vote shares provides a measure of whether the redistricting map produces skewed election results. The following is an example of how this is calculated:

| Party A | Percentages I |
|---|---|
| | 41.1% |
| | 41.9% |
| | 45.7% |
| | 46.5% |
| | 46.5% |
| | 46.5% |
| | 47.2% |
| | 50.7% |
| | 69.9% |
| | 70.3% |
| | |
| District median percentage | 46.5% |
| Statewide mean percentage | 50.7% |
| Mean-Median Difference | 4.2% |

In this example, Party A received 50.7% of the statewide vote. Party A's median vote share (46.5%) is 4.2% lower than its mean vote share of 50.7%. This indicates that Party A must win more districts than Party B to win half of the seats – the redistricting map in skewed in favor of Party B. In fact, Party A would have had to win 54.2% (50.0 + 4.2) of the statewide vote to win 50% of the seats.

## C. Efficiency Gap

This measure, introduced by University of Chicago law professor Nick Stephanopoulos and Public Policy Institute of California research fellow Eric McGhee, looks at the number of "wasted votes" across districts.[28]

In any election, nearly 50 percent of votes are wasted: all votes cast for a losing candidate, and any votes cast for a winning candidate beyond the threshold needed to win (50 percent in a two-candidate contest). In a hypothetical map with perfect partisan symmetry, both

---

[28] Nicholas O. Stephanopoulos and Eric M. McGhee, "Partisan Gerrymandering and the Efficiency Gap," *University of Chicago Law Review*, Vol. 82 (2), 2015. Available at: https://chicagounbound.uchicago.edu/uclrev/vol82/iss2/4.

parties would waste the same number of votes. A large difference between the parties' wasted votes indicates one party is treated more favorably than the other by the redistricting map. This is because the plan packs and cracks one party's supporters more than the other party's supporters.

The efficiency gap is calculated by taking one party's total wasted votes in an election, subtracting the other party's total wasted votes, and dividing this by the total number of votes cast. It captures in a single number the extent to which district lines waste the two parties votes unequally.

$$\text{Efficiency Gap} = \frac{[\text{Party A wasted votes}] - [\text{Party B wasted votes}]}{\text{total number of votes cast statewide}}$$

Example:

| District | Party A | Party B | Total Votes | Lost Votes Party A | Lost Votes Party B | minimum to win | Surplus Votes Party A | Surplus Votes Party B | Total Wasted Votes Party A | Total Wasted Votes Party B |
|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 279 | 120 | 399 | 0 | 120 | 200 | 79 | 0 | 79 | 120 |
| 2 | 172 | 198 | 370 | 172 | 0 | 185 | 0 | 13 | 172 | 13 |
| 3 | 167 | 192 | 359 | 167 | 0 | 180 | 0 | 12 | 167 | 12 |
| 4 | 148 | 212 | 360 | 148 | 0 | 180 | 0 | 32 | 148 | 32 |
| 5 | 185 | 180 | 365 | 0 | 180 | 183 | 2 | 0 | 2 | 180 |
| 6 | 139 | 193 | 332 | 139 | 0 | 166 | 0 | 27 | 139 | 27 |
| 7 | 169 | 201 | 370 | 169 | 0 | 185 | 0 | 16 | 169 | 16 |
| 8 | 179 | 206 | 385 | 179 | 0 | 193 | 0 | 13 | 179 | 13 |
| 9 | 234 | 99 | 333 | 0 | 99 | 167 | 67 | 0 | 67 | 99 |
| 10 | 178 | 199 | 377 | 178 | 0 | 189 | 0 | 10 | 178 | 10 |
| TOTAL | 1850 | 1800 | 3650 | 1152 | 399 | | 148 | 123 | 1300 | 522 |

In this example, supporters of Party A cast 1152 votes for losing candidates and 148 surplus votes – votes beyond what was necessary to elect Party A candidates. Supporters of Party B, on the other hand, cast only 399 of their votes for losing candidates and 522 surplus votes. Adding together these two sets of votes, Party A had a total of 1300 wasted votes; Party B had a total of only 522 votes. The efficiency gap is therefore calculated as 21.3% (1300-522/3650 = 778/3650 = .213). This efficiency gap in favor of Party B can be interpreted as the percentage of seats Party B won above what would be expected in a politically fair or neutral map.

## D. Court Acceptance of these Measures

These three measures have all been developed within the last decade and therefore do not have a long history of consideration by the courts. However, they have been introduced recently

in the context of partisan gerrymandering challenges. While recognizing each of the measures have some disadvantages, the courts in each instance relied on these measures (in addition to other measures introduced) to find the plans before them were politically biased towards one of the political parties at the expense of the other.[29]

---

[29] Examples of court cases relying on at least one of the measures of political fairness described in this report include: *League of Women Voters of Michigan v. Benson*, in which the federal court held the congressional and state legislative plans in Michigan to be an unconstitutional gerrymander; *Ohio A. Philip Randolph Institute v. Householder*, which held the Ohio congressional map to be an unconstitutional partisan gerrymander; *League of Women Voters of Pennsylvania v. Commonwealth of Pennsylvania* in which the State Supreme Court held the Pennsylvania congressional districts to be in violation of the Pennsylvania Constitution; *Whitford v. Gill* in which the federal court determined the Wisconsin state assembly districts were unconstitutional; *Common Cause v. Rucho* in which the federal court found the North Carolina congressional district plan adopted in 2016 was an unconstitutional partisan gerrymander. This North Carolina decision, along with the Maryland case, *Lamone v. Benisek*, was later overturned by the U.S. Supreme Court on unrelated grounds, but grounds that served to moot all of the federal decisions discussed above. However, in a separate challenge before the North Carolina Superior Court, *Common Cause v. Lewis*, the court held that the state legislative districts violated the North Carolina State Constitution.

# APPENDIX A

| Statewide | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **2012 General** | | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | | |
| Barack Obama | D | AA | 54.2% | 98.6 | 106.5 | 99.2 | 97.8 | 44.0 | 42.7 | 43.3 | 44.5 |
| Mitt Romney | R | W | 44.7% | 1.2 | -6.6 | 0.4 | 1.2 | 54.8 | 55.9 | 55.3 | 54.6 |
| others | | | | 0.2 | 0.2 | 1.1 | 1.1 | 1.3 | 13.8 | 1.2 | 1.0 |
| votes for office | | | | 62.1 | 57.3 | 59.1 | 59.1 | 69.2 | 66.1 | 68.1 | 68.1 |
| | | | | | | | | | | | |
| **U.S. Senate** | | | | | | | | | | | |
| Debbie Stabenow | D | W | 58.8% | 97.3 | 103.8 | 99.2 | 96.8 | 50.1 | 49.4 | 49.1 | 50.6 |
| Peter Hoekstra | R | W | 38.0% | 1.2 | -5.3 | 0.5 | 1.1 | 46.5 | 46.9 | 46.9 | 46.2 |
| others | | | | 1.5 | 1.5 | 1.7 | 2.0 | 3.4 | 3.7 | 3.6 | 3.2 |
| votes for office | | | | 61.6 | 56.9 | 58.8 | 58.8 | 68.0 | 64.9 | 66.9 | 66.9 |
| | | | | | | | | | | | |
| **2014 General** | | | | | | | | | | | |
| **Governor** | | | | | | | | | | | |
| Mark Schauer | D | W | 46.9% | 94.4 | 101.3 | 97.4 | 95.7 | 38.7 | 37.1 | 36.2 | 38.4 |
| Rick Snyder | R | W | 50.9% | 4.8 | -2.2 | 2.1 | 2.5 | 58.9 | 60.2 | 61.3 | 59.4 |
| others | | | | 0.8 | 0.8 | 1.4 | 1.8 | 2.4 | 2.7 | 2.5 | 2.1 |
| votes for office | | | | 36.9 | 31.6 | 35.1 | 35.1 | 49.6 | 46.7 | 49.1 | 49.1 |
| | | | | | | | | | | | |
| **Secretary of State** | | | | | | | | | | | |
| Godfrey Dillard | D | AA | 42.9% | 94.4 | 102.0 | 97.6 | 95.8 | 33.8 | 31.9 | 31.3 | 33.5 |
| Ruth Johnson | R | W | 53.5% | 4.2 | -3.3 | 1.5 | 2.1 | 62.3 | 63.9 | 64.7 | 62.9 |
| others | | | | 1.4 | 1.3 | 1.2 | 2.1 | 3.9 | 4.3 | 4.0 | 3.6 |
| votes for office | | | | 36.5 | 31.3 | 34.8 | 34.8 | 48.3 | 45.4 | 47.8 | 47.8 |
| | | | | | | | | | | | |
| **Attorney General** | | | | | | | | | | | |
| Mark Totten | D | W | 44.2% | 93.3 | 101.3 | 97.0 | 95.2 | 34.7 | 32.8 | 33.0 | 35.0 |
| Bill Schuette | R | W | 52.1% | 5.2 | -2.9 | 2.1 | 2.5 | 61.3 | 62.8 | 62.9 | 61.2 |
| others | | | | 1.5 | 1.6 | 1.2 | 2.2 | 4.0 | 4.4 | 4.1 | 3.8 |
| votes for office | | | | 36.4 | 31.2 | 34.6 | 34.6 | 48.3 | 45.5 | 47.8 | 47.8 |

Def. App. 076a

| Statewide | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **U.S. Senate** | | | | | | | | | | | |
| Gary Peters | D | W | 54.6% | 96.8 | 103.9 | 99.1 | 96.5 | 46.2 | 44.8 | 45.1 | 47.3 |
| Terry Lynn Land | R | W | 41.3% | 2.0 | -5.0 | 0.5 | 1.6 | 49.4 | 50.3 | 50.2 | 48.5 |
| others | | | | 1.2 | 1.1 | 1.0 | 2.0 | 4.5 | 4.8 | 4.6 | 4.2 |
| *votes for office* | | | | *36.8* | *31.5* | *35.0* | *35.0* | *48.9* | *46.1* | *48.5* | *48.5* |
| | | | | | | | | | | | |
| **2016 General** | | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | | |
| Hillary Clinton | D | W | 47.3% | 96.8 | 106.3 | 98.9 | 97.3 | 33.6 | 30.2 | 32.0 | 34.3 |
| Donald Trump | R | W | 47.5% | 2.0 | -7.4 | 0.3 | 1.1 | 61.0 | 63.9 | 61.6 | 60.0 |
| others | | | | 1.2 | 1.2 | 0.8 | 1.6 | 5.4 | 6.0 | 6.2 | 5.7 |
| *votes for office* | | | | *58.9* | *53.6* | *54.1* | *54.1* | *68.2* | *65.8* | *67.2* | *67.2* |
| | | | | | | | | | | | |
| **2018 General** | | | | | | | | | | | |
| **Governor** | | | | | | | | | | | |
| Whitmer/Gilchrist | D | W/AA | 53.3% | 95.6 | 104.3 | 98.6 | 95.3 | 41.1 | 38.9 | 40.6 | 44.8 |
| Schuette/Lyons | R | W/W | 43.8% | 2.5 | -6.4 | 0.6 | 1.8 | 56.0 | 57.9 | 56.2 | 52.8 |
| others | | | | 1.9 | 2.1 | 2.6 | 2.9 | 2.9 | 3.2 | 2.9 | 2.5 |
| *votes for office* | | | | *36.6* | *31.6* | *35.2* | *35.2* | *61.9* | *61.7* | *63.3* | *63.3* |
| | | | | | | | | | | | |
| **Secretary of State** | | | | | | | | | | | |
| Jocelyn Benson | D | W | 52.9% | 95.7 | 104.7 | 98.7 | 95.6 | 40.1 | 38.0 | 39.9 | 43.9 |
| Mary Treder Lang | R | W | 44.0% | 2.4 | -6.6 | 0.6 | 1.8 | 56.5 | 58.3 | 56.4 | 53.1 |
| others | | | | 1.9 | 1.9 | 1.7 | 2.7 | 3.4 | 3.7 | 3.5 | 2.9 |
| *votes for office* | | | | *36.4* | *31.6* | *35.1* | *35.1* | *60.9* | *60.7* | *62.2* | *62.2* |
| | | | | | | | | | | | |
| **Attorney General** | | | | | | | | | | | |
| Dana Nessel | D | W | 49.0% | 94.1 | 103.3 | 97.7 | 94.4 | 36.1 | 33.6 | 35.3 | 39.4 |
| Tom Leonard | R | W | 46.3% | 2.4 | -6.9 | 0.5 | 1.7 | 59.0 | 61.1 | 59.3 | 55.9 |
| others | | | | 3.5 | 3.6 | 3.0 | 3.9 | 4.9 | 5.3 | 5.2 | 45.9 |
| *votes for office* | | | | *36.0* | *31.2* | *34.6* | *34.6* | *60.4* | *60.1* | *61.7* | *61.7* |

Def. App. 077a

8/2022 10:30:25 PM

| Statewide | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **U.S. Senate** | | | | | | | | | | | |
| Debbie Stabenow | D | W | 52.3% | 93.9 | 102.5 | 97.5 | 94.3 | 40.3 | 38.1 | 39.5 | 43.7 |
| John James | R | AA | 45.8% | 3.8 | -5.1 | 1.1 | 2.0 | 57.8 | 59.9 | 58.4 | 55.1 |
| others | | | | 2.3 | 2.5 | 2.4 | 3.7 | 1.9 | 2.0 | 1.7 | 1.2 |
| votes for office | | | | 36.5 | 31.5 | 35.0 | 35.0 | 61.8 | 61.6 | 63.1 | 63.1 |
| | | | | | | | | | | | |
| **2020 General** | | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | | |
| Joseph Biden | D | W | 50.6% | 95.4 | 105.0 | 98.4 | 96.2 | 37.0 | 34.7 | 36.9 | 40.0 |
| Donald Trump | R | W | 47.8% | 3.8 | -5.4 | 1.1 | 1.9 | 61.5 | 63.6 | 61.2 | 59.1 |
| others | | | | 0.8 | 0.8 | 1.3 | 1.9 | 1.6 | 1.7 | 1.6 | 1.0 |
| votes for office | | | | 61.2 | 53.3 | 55.2 | 55.2 | 79.1 | 77.7 | 79.0 | 79.0 |
| | | | | | | | | | | | |
| **U.S. Senate** | | | | | | | | | | | |
| Gary Peters | D | W | 49.9% | 93.4 | 102.3 | 97.2 | 93.9 | 36.9 | 34.8 | 36.4 | 39.4 |
| John James | R | AA | 48.2% | 3.8 | -5.6 | 1.1 | 1.7 | 61.5 | 63.5 | 61.7 | 59.8 |
| others | | | | 2.7 | 3.1 | 3.7 | 4.4 | 1.6 | 1.6 | 1.4 | 0.9 |
| votes for office | | | | 59.9 | 53.0 | 55.0 | 55.0 | 78.3 | 76.8 | 78.1 | 78.1 |

| County: Genesee | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **2012 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Barack Obama | D | AA | 99.0 | 107.0 | 99.5 | 97.6 | 52.9 | 52.0 | 52.8 | 53.7 |
| Mitt Romney | R | W | 0.7 | -6.7 | 0.5 | 1.3 | 46.1 | 46.0 | 46.0 | 45.5 |
| others | | | 0.2 | 0.3 | 0.7 | 1.1 | 1.1 | 1.3 | 0.9 | 0.8 |
| votes for office | | | 64.1 | 57.4 | 61.0 | 61.0 | 70.1 | 65.1 | 68.4 | 68.4 |
| **U.S. Senate** | | | | | | | | | | |
| Debbie Stabenow | D | W | 97.8 | 103.9 | 99.7 | 96.7 | 59.7 | 59.8 | 59.4 | 60.2 |
| Peter Hoekstra | R | W | 0.9 | -5.3 | 0.5 | 1.3 | 36.7 | 36.3 | 36.5 | 35.2 |
| others | | | 1.3 | 1.3 | 1.1 | 2.0 | 3.6 | 3.9 | 3.8 | 32.2 |
| votes for office | | | 63.7 | 57.3 | 60.7 | 60.7 | 69.2 | 64.4 | 67.5 | 67.5 |
| **2014 General** | | | | | | | | | | |
| **Governor** | | | | | | | | | | |
| Mark Schauer | D | W | 97.1 | 104.2 | 99.3 | 95.8 | 50.7 | 50.5 | 49.5 | 51.8 |
| Rick Snyder | R | W | 2.0 | -5.0 | 0.6 | 2.3 | 46.5 | 46.5 | 47.5 | 45.8 |
| others | | | 0.9 | 0.9 | 1.1 | 1.9 | 2.8 | 3.0 | 2.8 | 2.4 |
| votes for office | | | 37.6 | 31.4 | 35.8 | 35.8 | 48.8 | 44.6 | 47.5 | 67.5 |
| **Secretary of State** | | | | | | | | | | |
| Godfrey Dillard | D | AA | 96.1 | 104.3 | 99.0 | 95.6 | 45.3 | 45.8 | 44.2 | 46.2 |
| Ruth Johnson | R | W | 2.6 | -5.3 | 0.3 | 2.2 | 50.7 | 50.5 | 51.5 | 50.2 |
| others | | | 1.3 | 1.1 | 1.1 | 2.2 | 4.1 | 4.3 | 4.1 | 3.6 |
| votes for office | | | 37.4 | 31.5 | 35.9 | 35.9 | 47.4 | 43.3 | 46.1 | 46.1 |
| **Attorney General** | | | | | | | | | | |
| Mark Totten | D | W | 95.2 | 103.4 | 98.7 | 95.6 | 44.2 | 43.9 | 43.3 | 45.2 |
| Bill Schuette | R | W | 3.7 | -4.4 | 0.8 | 2.4 | 52.6 | 52.6 | 53.3 | 51.9 |
| others | | | 1.1 | 1.1 | 0.9 | 2.0 | 3.3 | 3.5 | 3.3 | 2.9 |
| votes for office | | | 37.3 | 31.4 | 35.9 | 35.9 | 46.8 | 42.8 | 45.5 | 45.5 |

| County: Genesee | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **U.S. Senate** | | | | | | | | | | |
| Gary Peters | D | W | 97.2 | 103.9 | 99.5 | 95.6 | 57.0 | 57.0 | 56.4 | 58.6 |
| Terry Lynn Land | R | W | 1.7 | -4.8 | 0.6 | 2.2 | 38.7 | 38.0 | 39.0 | 37.5 |
| others | | | 1.2 | 0.9 | 0.8 | 2.2 | 4.3 | 4.6 | 4.4 | 3.9 |
| *votes for office* | | | *37.6* | *31.5* | *36.1* | *36.1* | *48.3* | *44.3* | *47.1* | *47.1* |
| **2016 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Hillary Clinton | D | W | 97.5 | 106.0 | 99.5 | 96.4 | 37.8 | 34.5 | 35.3 | 37.4 |
| Donald Trump | R | W | 1.5 | -7.0 | 0.4 | 1.7 | 57.0 | 59.4 | 58.5 | 57.1 |
| others | | | 1.0 | 1.1 | 1.0 | 1.9 | 5.2 | 6.1 | 6.1 | 5.5 |
| *votes for office* | | | *70.6* | *59.8* | *59.0* | *59.0* | *70.9* | *63.5* | *67.3* | *67.3* |
| **2018 General** | | | | | | | | | | |
| **Governor** | | | | | | | | | | |
| Whitmer/Gilchrist | D | W/AA | 96.2 | 103.6 | 99.2 | 95.3 | 46.7 | 45.5 | 45.8 | 46.2 |
| Schuette/Lyons | R | W/W | 2.2 | -5.5 | 0.2 | 2.0 | 50.5 | 50.9 | 50.5 | 50.8 |
| others | | | 1.6 | 1.9 | 1.7 | 2.7 | 2.8 | 3.6 | 3.2 | 3.0 |
| *votes for office* | | | *54.2* | *43.5* | *45.1* | *45.1* | *62.6* | *57.0* | *59.8* | *59.8* |
| **Secretary of State** | | | | | | | | | | |
| Jocelyn Benson | D | W | 96.5 | 103.7 | 99.2 | 95.2 | 45.7 | 44.7 | 44.9 | 48.0 |
| Mary Treder Lang | R | W | 2.0 | -5.8 | 0.3 | 2.0 | 50.9 | 51.2 | 50.8 | 48.7 |
| others | | | 1.5 | 2.1 | 1.4 | 2.8 | 3.4 | 4.2 | 3.7 | 3.4 |
| *votes for office* | | | *53.9* | *43.5* | *44.9* | *44.9* | *61.3* | *55.7* | *58.6* | *58.6* |
| **Attorney General** | | | | | | | | | | |
| Dana Nessel | D | W | 94.5 | 102.3 | 98.6 | 94.1 | 39.9 | 37.6 | 37.9 | 41.1 |
| Tom Leonard | R | W | 2.3 | -5.8 | 0.6 | 2.0 | 55.3 | 56.3 | 55.9 | 53.7 |
| others | | | 3.2 | 3.5 | 3.8 | 3.9 | 4.7 | 6.0 | 5.1 | 5.1 |
| *votes for office* | | | *53.7* | *43.2* | *44.6* | *44.6* | *61.0* | *55.6* | *58.4* | *58.4* |

| County: Genesee | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **U.S. Senate** | | | | | | | | | | |
| Debbie Stabenow | D | W | 95.3 | 103.2 | 98.9 | 95.2 | 43.8 | 42.8 | 42.8 | 45.8 |
| John James | R | AA | 3.0 | -5.3 | 0.7 | 2.1 | 54.3 | 54.6 | 54.6 | 52.6 |
| others | | | 1.7 | 2.2 | 1.7 | 2.8 | 1.9 | 2.6 | 1.8 | 1.6 |
| *votes for office* | | | *54.2* | *43.8* | *45.1* | *45.1* | *62.4* | *56.8* | *59.6* | *59.6* |
| | | | | | | | | | | |
| **2020 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Joseph Biden | D | W | 96.5 | 104.4 | 99.3 | 96.1 | 39.9 | 37.7 | 38.6 | 42.1 |
| Donald Trump | R | W | 3.0 | -5.1 | 0.5 | 2.1 | 58.7 | 60.5 | 59.6 | 56.7 |
| others | | | 0.5 | 0.7 | 0.9 | 1.8 | 1.4 | 1.8 | 1.8 | 1.2 |
| *votes for office* | | | *67.3* | *54.8* | *53.0* | *53.0* | *81.5* | *75.4* | *79.6* | *79.6* |
| | | | | | | | | | | |
| **U.S. Senate** | | | | | | | | | | |
| Gary Peters | D | W | 95.1 | 103.0 | 98.9 | 95.0 | 41.1 | 39.7 | 40.1 | 43.5 |
| John James | R | AA | 3.2 | -5.3 | 0.7 | 1.8 | 57.4 | 58.4 | 57.6 | 55.5 |
| others | | | 1.7 | 2.1 | 2.7 | 3.2 | 1.6 | 2.0 | 1.5 | 1.1 |
| *votes for office* | | | *67.1* | *54.8* | *56.6* | *56.6* | *80.6* | *74.4* | *78.7* | *78.7* |

Def. App. 081a

| County: Saginaw | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **2012 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Barack Obama | D | AA | | 114.3 | 99.5 | 95.7 | 41.6 | 39.1 | 41.1 | 42.9 |
| Mitt Romney | R | W | | -14.8 | 0.4 | 2.5 | 57.0 | 59.1 | 57.1 | 55.9 |
| others | | | | 0.2 | 0.6 | 1.8 | 1.5 | 1.7 | 1.7 | 1.2 |
| votes for office | | | | 56.7 | 56.2 | 56.2 | 71.4 | 69.5 | 70.3 | 70.3 |
| **U.S. Senate** | | | | | | | | | | |
| Debbie Stabenow | D | W | | 111.0 | 99.5 | 95.4 | 51.0 | 49.0 | 50.1 | 52.3 |
| Peter Hoekstra | R | W | | -11.6 | 0.7 | 2.2 | 46.0 | 47.6 | 46.3 | 44.9 |
| others | | | | 0.7 | 0.0 | 2.4 | 2.9 | 3.3 | 3.3 | 2.8 |
| votes for office | | | | 56.3 | 55.7 | 55.7 | 69.9 | 67.7 | 68.7 | 68.7 |
| **2014 General** | | | | | | | | | | |
| **Governor** | | | | | | | | | | |
| Mark Schauer | D | W | | 11.2 | 99.6 | 94.1 | 41.1 | 38.4 | 39.1 | 42.2 |
| Rick Snyder | R | W | | -12.3 | 0.5 | 3.0 | 56.3 | 58.9 | 58.1 | 55.7 |
| others | | | | 1.0 | 0.7 | 2.8 | 2.6 | 2.7 | 2.6 | 2.1 |
| votes for office | | | | 31.1 | 32.7 | 32.7 | 51.5 | 49.9 | 50.8 | 50.8 |
| **Secretary of State** | | | | | | | | | | |
| Godfrey Dillard | D | AA | | 111.3 | 99.2 | 94.4 | 35.3 | 32.6 | 33.5 | 36.3 |
| Ruth Johnson | R | W | | -12.5 | 0.5 | 2.8 | 60.5 | 63.0 | 62.0 | 59.9 |
| others | | | | 1.1 | 0.9 | 2.8 | 4.2 | 4.5 | 4.4 | 3.8 |
| votes for office | | | | 31.4 | 32.6 | 32.6 | 49.9 | 48.4 | 49.2 | 49.2 |
| **Attorney General** | | | | | | | | | | |
| Mark Totten | D | W | | 110.7 | 98.6 | 94.1 | 32.1 | 28.9 | 29.8 | 32.6 |
| Bill Schuette | R | W | | -12.1 | 0.5 | 2.9 | 65.2 | 68.2 | 67.2 | 65.1 |
| others | | | | 1.3 | 1.1 | 3.0 | 2.7 | 3.0 | 2.9 | 23.3 |
| votes for office | | | | 31.0 | 32.4 | 32.4 | 50.8 | 49.3 | 50.1 | 50.1 |

Def. App. 082a

| County: Saginaw | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **U.S. Senate** | | | | | | | | | | |
| Gary Peters | D | W | | 110.3 | 99.5 | 94.1 | 48.3 | 46.7 | 47.6 | 50.6 |
| Terry Lynn Land | R | W | | -10.6 | 0.7 | 3.0 | 47.8 | 49.1 | 47.9 | 45.8 |
| others | | | | 0.5 | 0.4 | 2.9 | 3.9 | 4.3 | 4.2 | 3.5 |
| votes for office | | | | 31.2 | 32.7 | 32.7 | 50.8 | 49.2 | 50.1 | 50.1 |
| | | | | | | | | | | |
| **2016 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Hillary Clinton | D | W | | 116.7 | 99.6 | 95.0 | | 25.1 | 28.1 | 30.6 |
| Donald Trump | R | W | | -17.2 | 0.5 | 2.5 | | 69.0 | 66.1 | 64.0 |
| others | | | | 0.4 | 0.0 | 2.5 | | 5.8 | 5.6 | 5.4 |
| votes for office | | | | 55.5 | 52.3 | 52.3 | | 69.0 | 70.2 | 70.2 |
| | | | | | | | | | | |
| **2018 General** | | | | | | | | | | |
| **Governor** | | | | | | | | | | |
| Whitmer/Gilchrist | D | W/AA | | 112.4 | 99.4 | 93.6 | | 34.8 | 36.4 | 40.9 |
| Schuette/Lyons | R | W/W | | -14.2 | 0.6 | 2.9 | | 62.4 | 60.3 | 56.9 |
| others | | | | 1.8 | 1.6 | 3.5 | | 2.8 | 2.5 | 2.2 |
| votes for office | | | | 38.9 | 37.7 | 37.7 | | 61.5 | 63.0 | 63.0 |
| | | | | | | | | | | |
| **Secretary of State** | | | | | | | | | | |
| Jocelyn Benson | D | W | | 113.3 | 99.6 | 93.7 | | 33.6 | 35.4 | 39.2 |
| Mary Treder Lang | R | W | | -14.9 | 0.6 | 3.2 | | 62.8 | 60.6 | 57.7 |
| others | | | | 3.5 | 1.2 | 3.1 | | 3.6 | 3.3 | 3.0 |
| votes for office | | | | 39.7 | 38.0 | 38.0 | | 60.0 | 61.4 | 61.4 |
| | | | | | | | | | | |
| **Attorney General** | | | | | | | | | | |
| Dana Nessel | D | W | | 112.5 | 99.0 | 93.4 | | 27.6 | 29.0 | 33.3 |
| Tom Leonard | R | W | | -15.5 | 0.5 | 2.6 | | 66.8 | 64.6 | 61.7 |
| others | | | | 3.0 | 2.1 | 4.0 | | 5.6 | 5.5 | 5.0 |
| votes for office | | | | 38.7 | 37.6 | 37.6 | | 59.7 | 61.0 | 61.0 |

Def. App. 083a

| County: Saginaw | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **U.S. Senate** | | | | | | | | | | |
| Debbie Stabenow | D | W | | 110.6 | 99.3 | 93.5 | | 33.7 | 34.6 | 39.3 |
| John James | R | AA | | -13.0 | 0.8 | 2.9 | | 64.9 | 63.0 | 59.6 |
| others | | | | 2.4 | 2.2 | 3.6 | | 1.3 | 1.8 | 1.2 |
| votes for office | | | | 39.2 | 37.8 | 37.8 | | 61.5 | 62.8 | 62.8 |
| | | | | | | | | | | |
| **2020 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Joseph Biden | D | W | | 114.2 | 99.0 | 95.3 | | 29.3 | 32.0 | 36.3 |
| Donald Trump | R | W | | -14.9 | 0.6 | 2.7 | | 69.0 | 66.2 | 62.6 |
| others | | | | 0.6 | 1.1 | 2.0 | | 1.6 | 1.5 | 1.1 |
| votes for office | | | | 50.7 | 48.6 | 48.6 | | 78.3 | 79.6 | 79.6 |
| | | | | | | | | | | |
| **U.S. Senate** | | | | | | | | | | |
| Gary Peters | D | W | | 112.5 | 99.5 | 93.8 | | 31.1 | 33.1 | 37.5 |
| John James | R | AA | | -14.7 | 0.6 | 3.0 | | 67.3 | 65.0 | 61.6 |
| others | | | | 2.1 | 2.8 | 3.2 | | 1.5 | 1.2 | 0.9 |
| votes for office | | | | 50.7 | 48.4 | 48.4 | | 77.2 | 78.7 | 78.7 |

| County: Oakland | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **2012 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Barack Obama | D | AA | 98.2 | 111.7 | 99.4 | 95.7 | 43.9 | 39.7 | 40.7 | 42.1 |
| Mitt Romney | R | W | 1.6 | -11.8 | 0.5 | 2.3 | 55.0 | 59.1 | 58.1 | 57.2 |
| others | | | 0.3 | 0.2 | 1.7 | 2.1 | 1.1 | 1.1 | 1.0 | 0.6 |
| *votes for office* | | | *78.9* | *69.2* | *68.9* | *68.2* | *75.7* | *74.8* | *75.7* | *75.7* |
| **U.S. Senate** | | | | | | | | | | |
| Debbie Stabenow | D | W | 97.3 | 110.5 | 99.1 | 95.8 | 48.4 | 44.5 | 45.7 | 47.6 |
| Peter Hoekstra | R | W | 1.6 | -11.4 | 0.0 | 1.9 | 47.9 | 51.8 | 50.3 | 49.2 |
| others | | | 1.1 | 0.9 | 0.8 | 2.3 | 3.7 | 3.7 | 3.5 | 3.2 |
| *votes for office* | | | *78.3* | *69.2* | *67.8* | *67.8* | *74.0* | *73.0* | *74.0* | *74.0* |
| **2014 General** | | | | | | | | | | |
| **Governor** | | | | | | | | | | |
| Mark Schauer | D | W | 94.5 | 108.9 | 99.1 | 94.8 | 33.9 | 27.9 | 28.2 | 30.6 |
| Rick Snyder | R | W | 5.0 | -9.5 | 0.8 | 2.8 | 64.1 | 70.1 | 69.8 | 68.1 |
| others | | | 0.5 | 1.9 | 1.0 | 2.5 | 2.0 | 2.0 | 1.9 | 1.3 |
| *votes for office* | | | *51.5* | *44.4* | *46.3* | *46.3* | *54.5* | *53.6* | *54.6* | *54.6* |
| **Secretary of State** | | | | | | | | | | |
| Godfrey Dillard | D | AA | 93.3 | 109.7 | 99.1 | 94.6 | 29.1 | 23.5 | 24.3 | 26.4 |
| Ruth Johnson | R | W | 5.4 | -9.5 | 0.4 | 2.7 | 67.9 | 73.5 | 72.7 | 71.4 |
| others | | | 1.3 | 1.9 | 1.2 | 2.7 | 2.9 | 3.0 | 2.7 | 2.2 |
| *votes for office* | | | *51.1* | *44.4* | *45.9* | *45.9* | *53.2* | *52.1* | *53.1* | *53.1* |
| **Attorney General** | | | | | | | | | | |
| Mark Totten | D | W | 93.0 | 107.5 | 98.8 | 94.1 | 35.0 | 30.1 | 30.3 | 32.9 |
| Bill Schuette | R | W | 5.6 | -8.8 | 0.8 | 3.0 | 61.3 | 66.2 | 65.9 | 64.0 |
| others | | | 1.4 | 1.3 | 1.5 | 2.9 | 3.7 | 3.7 | 3.5 | 3.1 |
| *votes for office* | | | *51.1* | *44.2* | *45.8* | *45.8* | *52.7* | *51.7* | *52.6* | *52.6* |

| County: Oakland | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **U.S. Senate** | | | | | | | | | | |
| Gary Peters | D | W | 96.8 | 110.6 | 99.4 | 95.0 | 46.9 | 43.6 | 44.0 | 46.7 |
| Terry Lynn Land | R | W | 2.0 | -10.9 | 0.0 | 2.4 | 48.7 | 52.5 | 51.5 | 49.7 |
| others | | | 1.2 | 0.3 | 0.5 | 2.6 | 4.4 | 4.7 | 4.4 | 3.6 |
| *votes for office* | | | *51.5* | *44.7* | *46.5* | *46.5* | *53.7* | *53.7* | *53.7* | *53.7* |
| **2016 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Hillary Clinton | D | W | 95.2 | 108.8 | 99.4 | 95.1 | 36.0 | 34.2 | 34.3 | 39.1 |
| Donald Trump | R | W | 3.4 | -9.7 | 0.8 | 2.4 | 58.6 | 59.8 | 59.6 | 55.8 |
| others | | | 1.4 | 0.7 | 0.1 | 2.5 | 5.4 | 6.0 | 6.0 | 5.1 |
| *votes for office* | | | *73.0* | *61.1* | *65.6* | *65.6* | *74.6* | *72.4* | *73.5* | *73.5* |
| **2018 General** | | | | | | | | | | |
| **Governor** | | | | | | | | | | |
| Whitmer/Gilchrist | D | W/AA | 95.3 | 107.6 | 99.3 | 94.1 | 44.2 | 42.4 | 42.2 | 47.4 |
| Schuette/Lyons | R | W/W | 3.5 | -9.0 | 0.7 | 2.7 | 53.3 | 55.0 | 54.6 | 50.7 |
| others | | | 1.2 | 1.3 | 1.4 | 3.3 | 2.5 | 2.6 | 2.6 | 1.9 |
| *votes for office* | | | *62.5* | *51.6* | *53.2* | *53.2* | *69.6* | *68.2* | *68.8* | *68.8* |
| **Secretary of State** | | | | | | | | | | |
| Jocelyn Benson | D | W | 95.2 | 108.1 | 99.1 | 94.2 | 44.3 | 42.4 | 42.3 | 47.5 |
| Mary Treder Lang | R | W | 3.4 | -9.4 | 0.7 | 2.7 | 53.0 | 54.7 | 54.5 | 50.5 |
| others | | | 1.4 | 1.3 | 1.3 | 3.1 | 2.7 | 2.8 | 2.6 | 2.0 |
| *votes for office* | | | *62.1* | *51.5* | *53.1* | *53.1* | *68.7* | *67.1* | *67.7* | *67.7* |
| **Attorney General** | | | | | | | | | | |
| Dana Nessel | D | W | 93.8 | 107.3 | 99.2 | 93.8 | 40.2 | 37.9 | 37.5 | 43.0 |
| Tom Leonard | R | W | 3.5 | -9.7 | 0.6 | 2.6 | 55.4 | 96.8 | 57.5 | 53.0 |
| others | | | 2.7 | 2.4 | 2.0 | 3.6 | 4.4 | 0.5 | 4.4 | 4.0 |
| *votes for office* | | | *61.4* | *50.7* | *52.5* | *52.5* | *67.9* | *66.4* | *67.0* | *67.0* |

Def. App. 086a

| County: Oakland | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **U.S. Senate** | | | | | | | | | | |
| Debbie Stabenow | D | W | 93.8 | 106.5 | 98.7 | 93.0 | 42.7 | 41.1 | 40.9 | 45.5 |
| John James | R | AA | 4.8 | -8.4 | 0.8 | 2.8 | 55.9 | 57.5 | 57.5 | 53.6 |
| others | | | 1.5 | 1.7 | 1.6 | 4.2 | 1.4 | 1.7 | 1.5 | 0.9 |
| votes for office | | | 62.5 | 51.5 | 53.2 | 53.2 | 69.5 | 68.1 | 68.7 | 68.7 |
| | | | | | | | | | | |
| **2020 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Joseph Biden | D | W | 94.2 | 105.1 | 99.0 | 93.4 | 42.0 | 41.6 | 41.2 | 45.9 |
| Donald Trump | R | W | 5.3 | -5.7 | 1.3 | 3.6 | 56.4 | 56.8 | 57.2 | 53.1 |
| others | | | 0.6 | 1.6 | 1.7 | 3.0 | 1.5 | 1.6 | 1.6 | 1.0 |
| votes for office | | | 76.1 | 64.6 | 71.6 | 71.6 | 85.7 | 84.9 | 86.4 | 86.4 |
| | | | | | | | | | | |
| **U.S. Senate** | | | | | | | | | | |
| Gary Peters | D | W | 93.1 | 104.5 | 98.8 | 92.1 | 40.7 | 39.9 | 39.4 | 43.5 |
| John James | R | AA | 5.2 | -6.7 | 0.8 | 2.9 | 57.9 | 58.9 | 59.3 | 55.7 |
| others | | | 1.8 | 2.2 | 2.2 | 5.0 | 1.4 | 1.2 | 1.2 | 0.8 |
| votes for office | | | 75.7 | 64.7 | 71.4 | 71.4 | 84.8 | 84.1 | 85.4 | 85.4 |

Def. App. 087a

| County: Wayne | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **2012 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Barack Obama | D | AA | 98.6 | 102.2 | 99.5 | 99.0 | 51.1 | 51.2 | 51.1 | 51.9 |
| Mitt Romney | R | W | 1.2 | -2.4 | 0.5 | 0.6 | 48.0 | 47.8 | 47.7 | 47.3 |
| others | | | 0.2 | 0.2 | 0.3 | 0.4 | 0.9 | 1.1 | 0.9 | 0.8 |
| votes for office | | | 61.3 | 58.3 | 60.4 | 60.4 | 68.9 | 63.4 | 65.7 | 65.7 |
| **U.S. Senate** | | | | | | | | | | |
| Debbie Stabenow | D | W | 97.3 | 100.2 | 98.9 | 98.1 | 56.8 | 57.2 | 56.6 | 57.6 |
| Peter Hoekstra | R | W | 1.2 | -1.6 | 0.4 | 0.6 | 39.6 | 38.8 | 39.1 | 38.6 |
| others | | | 1.5 | 1.5 | 1.5 | 1.3 | 3.6 | 4.0 | 4.0 | 3.8 |
| votes for office | | | 60.8 | 57.8 | 59.9 | 59.9 | 67.6 | 62.1 | 64.4 | 64.4 |
| **2014 General** | | | | | | | | | | |
| **Governor** | | | | | | | | | | |
| Mark Schauer | D | W | 94.2 | 97.8 | 96.4 | 96.5 | 41.1 | 41.2 | 39.2 | 41.3 |
| Rick Snyder | R | W | 5.0 | 1.4 | 2.9 | 2.6 | 56.9 | 56.3 | 58.4 | 56.6 |
| others | | | 0.8 | 0.8 | 0.7 | 0.9 | 2.0 | 2.5 | 2.3 | 2.0 |
| votes for office | | | 36.3 | 33.0 | 35.8 | 35.8 | 50.7 | 44.1 | 47.7 | 47.7 |
| **Secretary of State** | | | | | | | | | | |
| Godfrey Dillard | D | AA | 94.3 | 98.4 | 96.7 | 96.8 | 36.8 | 36.6 | 35.0 | 36.8 |
| Ruth Johnson | R | W | 4.3 | 0.3 | 2.1 | 1.9 | 59.7 | 59.2 | 61.2 | 59.6 |
| others | | | 1.4 | 1.4 | 1.3 | 1.3 | 3.4 | 4.1 | 3.8 | 3.6 |
| votes for office | | | 35.9 | 32.7 | 35.5 | 35.5 | 49.0 | 42.5 | 46.1 | 46.1 |
| **Attorney General** | | | | | | | | | | |
| Mark Totten | D | W | 93.2 | 97.0 | 95.5 | 95.7 | 41.0 | 40.7 | 39.1 | 41.0 |
| Bill Schuette | R | W | 5.3 | 1.5 | 3.2 | 2.9 | 55.4 | 54.9 | 56.8 | 55.1 |
| others | | | 1.5 | 1.5 | 1.4 | 1.4 | 3.7 | 4.4 | 4.1 | 3.9 |
| votes for office | | | 35.7 | 32.5 | 35.3 | 35.3 | 48.8 | 42.3 | 45.9 | 45.9 |

Def. App. 088a

| County: Wayne | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **U.S. Senate** | | | | | | | | | | |
| Gary Peters | D | W | 96.8 | 100.0 | 98.5 | 98.0 | 52.8 | 52.7 | 51.4 | 53.4 |
| Terry Lynn Land | R | W | 2.0 | -1.1 | 0.6 | 1.0 | 42.7 | 42.4 | 43.4 | 41.8 |
| others | | | 1.2 | 1.1 | 1.0 | 1.1 | 4.5 | 5.5 | 5.0 | 4.7 |
| *votes for office* | | | *36.2* | *32.9* | *35.7* | *35.7* | *49.8* | *43.2* | *46.8* | *46.8* |
| **2016 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Hillary Clinton | D | W | 96.8 | 101.0 | 99.0 | 98.4 | 47.1 | 39.1 | 38.2 | 39.7 |
| Donald Trump | R | W | 2.0 | -2.1 | 0.6 | 0.7 | 47.8 | 54.8 | 55.4 | 54.4 |
| others | | | 1.2 | 1.1 | 1.0 | 0.9 | 5.1 | 6.1 | 6.0 | 5.9 |
| *votes for office* | | | *57.7* | *55.7* | *57.0* | *57.0* | *72.2* | *61.6* | *64.0* | *64.0* |
| **2018 General** | | | | | | | | | | |
| **Governor** | | | | | | | | | | |
| Whitmer/Gilchrist | D | W/AA | 95.6 | 99.0 | 97.6 | 97.0 | 53.4 | 49.7 | 47.9 | 53.5 |
| Schuette/Lyons | R | W/W | 2.5 | -1.0 | 0.9 | 1.1 | 44.6 | 47.3 | 49.1 | 44.0 |
| others | | | 2.0 | 2.0 | 2.1 | 1.9 | 2.0 | 3.0 | 2.8 | 2.5 |
| *votes for office* | | | *33.9* | *30.9* | *33.2* | *33.2* | *67.2* | *59.8* | *63.2* | *63.2* |
| **Secretary of State** | | | | | | | | | | |
| Jocelyn Benson | D | W | 95.7 | 99.0 | 97.7 | 97.0 | 53.1 | 50.0 | 49.1 | 53.6 |
| Mary Treder Lang | R | W | 2.4 | -1.0 | 1.0 | 1.1 | 44.7 | 46.8 | 48.5 | 43.6 |
| others | | | 2.0 | 2.0 | 2.0 | 1.8 | 2.2 | 3.2 | 3.2 | 2.8 |
| *votes for office* | | | *33.7* | *30.8* | *33.1* | *33.1* | *66.2* | *58.8* | *62.2* | *62.2* |
| **Attorney General** | | | | | | | | | | |
| Dana Nessel | D | W | 94.1 | 97.7 | 96.3 | 95.5 | 49.6 | 45.6 | 43.6 | 49.4 |
| Tom Leonard | R | W | 2.4 | -1.3 | 0.8 | 1.0 | 47.2 | 49.9 | 51.8 | 46.6 |
| others | | | 3.6 | 3.6 | 3.5 | 3.5 | 3.3 | 4.9 | 4.3 | 4.1 |
| *votes for office* | | | *33.3* | *30.4* | *32.7* | *32.7* | *65.4* | *58.0* | *61.3* | *61.3* |

Def. App. 089a

| County: Wayne | Party | Race | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **U.S. Senate** | | | | | | | | | | |
| Debbie Stabenow | D | W | 93.8 | 97.1 | 95.9 | 95.8 | 52.4 | 48.9 | 47.1 | 52.3 |
| John James | R | AA | 3.8 | 0.4 | 1.9 | 1.5 | 46.5 | 49.1 | 52.2 | 46.5 |
| others | | | 2.4 | 2.5 | 2.4 | 2.7 | 1.1 | 1.7 | 1.4 | 1.3 |
| votes for office | | | 33.7 | 30.8 | 33.1 | 33.1 | 67.2 | 59.6 | 63.1 | 63.1 |
| | | | | | | | | | | |
| **2020 General** | | | | | | | | | | |
| **U.S. President** | | | | | | | | | | |
| Joseph Biden | D | W | 95.4 | 99.0 | 97.9 | 97.5 | 53.3 | 45.9 | 44.5 | 47.5 |
| Donald Trump | R | W | 3.8 | 0.2 | 1.6 | 1.5 | 45.4 | 52.6 | 53.9 | 51.3 |
| others | | | 0.8 | 0.8 | 0.8 | 0.9 | 1.3 | 0.8 | 1.5 | 1.3 |
| votes for office | | | 59.2 | 55.6 | 58.0 | 58.0 | 81.3 | 74.1 | 76.6 | 76.6 |
| | | | | | | | | | | |
| **U.S. Senate** | | | | | | | | | | |
| Gary Peters | D | W | 93.3 | 967.0 | 95.3 | 95.2 | 51.7 | 46.6 | 44.4 | 47.2 |
| John James | R | AA | 3.8 | 0.3 | 1.7 | 1.6 | 47.0 | 52.1 | 53.7 | 51.5 |
| others | | | 2.8 | 3.0 | 2.9 | 3.2 | 1.3 | 1.9 | 1.8 | 1.4 |
| votes for office | | | 58.9 | 55.3 | 57.8 | 57.8 | 80.6 | 73.0 | 75.6 | 75.6 |

| 2018 Democratic Primary for Governor | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **STATEWIDE** | | | | | | | | | | | |
| Abdul El-Sayed | D | ME | 30.2% | 21.0 | 24.2 | 23.5 | 26.0 | 25.7 | 27.1 | 30.2 | 28.5 |
| Shri Thanedar | D | A | 17.7% | 42.5 | 44.2 | 42.2 | 39.0 | 15.8 | 12.9 | 10.8 | 9.4 |
| Gretchen Whitmer | D | W | 52.0% | 36.5 | 31.6 | 33.5 | 35.0 | 58.6 | 60.0 | 59.4 | 62.0 |
| *votes for office* | | | | *23.0* | *22.5* | *24.5* | *24.5* | *13.9* | *12.0* | *14.0* | *14.0* |
| | | | | | | | | | | | |
| **Genesee** | | | | | | | | | | | |
| Abdul El-Sayed | D | ME | 22.9% | 16.5 | 18.6 | 17.9 | 21.0 | 22.3 | 24.8 | 24.2 | 23.5 |
| Shri Thanedar | D | A | 23.6% | 46.0 | 49.9 | 47.2 | 43.4 | 15.7 | 13.6 | 13.3 | 11.5 |
| Gretchen Whitmer | D | W | 53.4% | 37.5 | 31.6 | 34.5 | 35.7 | 62.0 | 61.6 | 61.9 | 65.1 |
| *votes for office* | | | | *26.9* | *23.4* | *25.9* | *25.9* | *15.5* | *13.3* | *14.8* | *14.8* |
| | | | | | | | | | | | |
| **Saginaw** | | | | | | | | | | | |
| Abdul El-Sayed | D | ME | 22.2% | | 18.9 | 17.5 | 21.0 | | 21.9 | 23.6 | 21.0 |
| Shri Thanedar | D | A | 24.7% | | 51.5 | 51.1 | 44.7 | | 16.8 | 14.7 | 14.5 |
| Gretchen Whitmer | D | W | 53.1% | | 29.6 | 31.3 | 34.4 | | 61.4 | 61.8 | 64.5 |
| *votes for office* | | | | | *19.7* | *20.7* | *20.7* | | *12.4* | *13.2* | *13.2* |
| | | | | | | | | | | | |
| **Oakland** | | | | | | | | | | | |
| Abdul El-Sayed | D | ME | 32.5% | 23.2 | 24.1 | 23.2 | 25.3 | 29.8 | 34.2 | 36.0 | 34.9 |
| Shri Thanedar | D | A | 13.4% | 32.7 | 38.5 | 37.5 | 34.7 | 8.4 | 4.3 | 4.3 | 3.0 |
| Gretchen Whitmer | D | W | 54.1% | 44.1 | 37.5 | 39.0 | 40.0 | 61.8 | 61.4 | 61.0 | 62.1 |
| *votes for office* | | | | *31.4* | *33.3* | *35.0* | *35.0* | *20.8* | *16.1* | *18.2* | *18.2* |
| | | | | | | | | | | | |
| **Wayne** | | | | | | | | | | | |
| Abdul El-Sayed | D | ME | 32.0% | 21.2 | 20.8 | 21.0 | 22.2 | 43.4 | 41.3 | 41.3 | 41.6 |
| Shri Thanedar | D | A | 24.3% | 42.8 | 45.6 | 43.8 | 42.5 | 7.5 | 4.8 | 5.4 | 3.9 |
| Gretchen Whitmer | D | W | 43.7% | 36.1 | 33.7 | 34.8 | 35.3 | 49.2 | 53.9 | 54.0 | 54.5 |
| *votes for office* | | | | *22.4* | *21.1* | *23.5* | *23.5* | *19.3* | *16.0* | *17.4* | *17.4* |

**APPENDIX B**

| Congressional District General Elections | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **Congressional District 5** | | | | | | | | | | | |
| **2018 General** | | | | | | | | | | | |
| Daniel Kildee | D | W | 59.5% | 96.2 | 104.4 | 99.1 | 95.0 | 48.4 | 46.5 | 47.5 | 50.5 |
| Travis Wines | R | W | 35.9% | 1.3 | -7.8 | 0.2 | 1.7 | 47.0 | 48.3 | 46.9 | 44.9 |
| others | | | | 2.5 | 3.3 | 3.2 | 3.3 | 4.6 | 5.2 | 4.9 | 4.7 |
| *votes for office* | | | | *53.8* | *42.7* | *43.8* | *43.8* | *59.2* | *56.5* | *58.3* | *58.3* |
| **2020 General** | | | | | | | | | | | |
| Daniel Kildee | D | W | 54.5% | 95.4 | 105.2 | 99.0 | 95.0 | 41.6 | 39.6 | 41.0 | 44.2 |
| Tim Kelly | R | W | 41.8% | 2.1 | -8.4 | 0.6 | 1.6 | 54.8 | 56.3 | 54.4 | 52.3 |
| others | | | | 2.6 | 3.2 | 3.0 | 3.4 | 3.6 | 4.1 | 3.9 | 3.5 |
| *votes for office* | | | | *67.1* | *54.5* | *54.5* | *54.5* | *76.6* | *73.8* | *76.0* | *76.0* |
| | | | | | | | | | | | |
| **Congressional District 9** | | | | | | | | | | | |
| **2018 General** | | | | | | | | | | | |
| Andy Levin | D | W | 59.7% | | 95.2 | 98.2 | 71.5 | | 50.2 | 48.9 | 55.7 |
| Candius Stearns | R | W | 36.8% | | -3.5 | 0.3 | 62.9 | | 47.5 | 47.4 | 43.2 |
| others | | | | | 8.4 | 9.4 | 22.2 | | 2.4 | 2.3 | 1.1 |
| *votes for office* | | | | | *17.9* | *17.5* | *17.5* | | *66.2* | *66.4* | *66.4* |
| **2020 General** | | | | | | | | | | | |
| Andy Levin | D | W | 57.7% | | 92.6 | 96.6 | 74.7 | | 48.3 | 45.9 | 52.0 |
| Charles Langworthy | R | W | 38.4% | | -0.6 | 0.5 | 5.6 | | 48.8 | 50.0 | 46.7 |
| others | | | | | 7.9 | 8.1 | 19.7 | | 3.0 | 2.7 | 1.3 |
| *votes for office* | | | | | *37.9* | *27.6* | *27.6* | | *80.2* | *82.7* | *82.7* |
| | | | | | | | | | | | |
| **Congressional District 12** | | | | | | | | | | | |
| **2018 General** | | | | | | | | | | | |
| Debbie Dingell | D | W | 68.1% | | 91.9 | 97.3 | 75.5 | | 58.4 | 57.5 | 63.3 |
| Jeff Jones | R | W | 28.9% | | 3.1 | 1.8 | 9.8 | | 38.6 | 38.9 | 35.6 |
| others | | | | | 5.0 | 4.4 | 14.7 | | 3.0 | 3.0 | 1.1 |
| *votes for office* | | | | | *33.4* | *37.1* | *37.1* | | *58.9* | *62.4* | *62.4* |

Def. App. 093a

| Congressional District General Elections | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **2020 General** | | | | | | | | | | | |
| Debbie Dingell | D | W | 66.4% | | 91.2 | 95.9 | 75.3 | | 56.4 | 55.3 | 58.7 |
| Jeff Jones | R | W | 30.7% | | 4.2 | 2.7 | 11.4 | | 40.6 | 41.6 | 40.0 |
| others | | | | | 4.3 | 4.2 | 13.2 | | 3.0 | 3.2 | 1.3 |
| votes for office | | | | | 50.3 | 58.2 | 58.2 | | 73.8 | 75.0 | 75.0 |
| | | | | | | | | | | | |
| **Congressional District 13** | | | | | | | | | | | |
| **2018 General** | | | | | | | | | | | |
| Rashida Tlaib | D | ME | 84.2% | 93.4 | 95.5 | 94.9 | 95.2 | | 64.2 | 64.5 | 65.6 |
| others | | | | 6.6 | 4.5 | 5.4 | 4.8 | | 35.7 | 35.7 | 34.4 |
| votes for office | | | | 32.5 | 32.3 | 34.7 | 34.7 | | 39.1 | 41.3 | 41.3 |
| **2020 General** | | | | | | | | | | | |
| Rashida Tlaib | D | ME | 78.1% | 94.6 | 97.8 | 96.5 | 96.1 | | 46.5 | 47.0 | 46.9 |
| David Dudenhoefer | R | W | 18.7% | 2.7 | -0.4 | 1.1 | 1.2 | | 49.2 | 48.7 | 49.0 |
| others | | | | 2.7 | 2.7 | 2.6 | 2.7 | | 4.4 | 4.2 | 4.1 |
| votes for office | | | | 587.0 | 57.5 | 60.0 | 60.0 | | 59.0 | 61.1 | 61.1 |
| | | | | | | | | | | | |
| **Congressional District 14** | | | | | | | | | | | |
| **2018 General** | | | | | | | | | | | |
| Brenda Lawrence | D | AA | 80.9% | 96.3 | 99.3 | 98.1 | 96.7 | 40.8 | 51.3 | 52.3 | 61.1 |
| Marc Herschfus | R | W | 17.3% | 1.7 | -1.4 | 0.5 | 1.6 | 58.1 | 46.9 | 40.9 | 36.9 |
| others | | | | 2.0 | 2.1 | 1.8 | 1.7 | 1.1 | 1.8 | 2.2 | 2.1 |
| votes for office | | | | 36.1 | 33.8 | 40.0 | 40.0 | 74.3 | 72.6 | 74.5 | 74.5 |
| **2020 General** | | | | | | | | | | | |
| Brenda Lawrence | D | AA | 79.3% | 95.0 | 97.9 | 96.6 | 96.5 | 41.6 | 49.3 | 50.3 | 55.6 |
| Robert Vance Patrick | R | W | 18.3% | 2.6 | -0.3 | 0.9 | 1.3 | 56.4 | 48.2 | 47.5 | 41.7 |
| others | | | | 2.4 | 2.5 | 2.2 | 2.2 | 2.0 | 2.5 | 2.4 | 2.6 |
| votes for office | | | | 59.9 | 57.4 | 61.7 | 61.7 | 90.7 | 85.0 | 86.3 | 86.3 |

| 2018 General: State Senate Districts | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **District 1 (Wayne)** | | | | | | | | | | | |
| Stephanie Chang | D | A | 72.0% | 91.3 | 97.8 | 94.1 | 93.2 | 47.2 | 49.0 | 48.8 | 53.3 |
| Pauline Montie | R | W | 24.2% | 2.1 | -4.2 | 0.8 | 1.1 | 51.0 | 49.4 | 48.6 | 44.6 |
| others | | | 3.8% | 6.1 | 6.4 | 6.3 | 5.6 | 1.8 | 1.6 | 1.6 | 2.1 |
| votes for office | | | | 33.3 | 27.8 | 31.0 | 31.0 | 66.6 | 54.7 | 57.3 | 57.3 |
| **District 2 (Wayne)** | | | | | | | | | | | |
| Adam Hollier | D | AA | 75.7% | 96.4 | 99.5 | 98.0 | 97.9 | 37.7 | 47.7 | 46.5 | 52.8 |
| Lisa Papas | R | W | 24.3% | 3.6 | 0.5 | 2.0 | 2.1 | 62.3 | 52.2 | 53.4 | 47.2 |
| votes for office | | | | 31.3 | 28.0 | 30.9 | 30.9 | 74.1 | 69.6 | 73.3 | 73.3 |
| **District 3 (Wayne)** | | | | | | | | | | | |
| Sylvia Santana | D | AA | 81.8% | 94.2 | 95.6 | 95.4 | 95.6 | 78.8 | 67.9 | 64.4 | 66.3 |
| Kathy Stecker | R | W | 15.3% | 2.5 | 1.1 | 1.5 | 1.3 | 18.9 | 29.3 | 32.6 | 31.0 |
| others | | | 2.9% | 3.9 | 3.3 | 3.3 | 3.1 | 2.3 | 2.8 | 2.7 | 2.7 |
| votes for office | | | | 30.7 | 29.2 | 30.0 | 30.0 | 38.7 | 42.8 | 45.4 | 45.4 |
| **District 4 (Wayne)** | | | | | | | | | | | |
| Marshall Bullock | D | AA | 78.3% | | 97.0 | 100.2 | 98.7 | | 45.3 | 46.1 | 51.1 |
| Angela Savino | R | W | 21.7% | | 3.0 | -0.1 | 1.3 | | 54.7 | 53.9 | 48.9 |
| votes for office | | | | 32.4 | 30.6 | 32.2 | 32.2 | | 50.2 | 51.2 | 51.2 |
| **District 5 (Wayne)** | | | | | | | | | | | |
| Betty Jean Alexander | D | AA | 77.4% | 93.4 | 95.5 | 95.4 | 95.3 | | 49.9 | 48.9 | 50.7 |
| DeShawn Wilkins | R | AA | 18.2% | 3.3 | 1.2 | 1.6 | 1.6 | | 43.7 | 44.5 | 43.1 |
| others | | | 4.4% | 3.3 | 3.3 | 3.2 | 3.1 | | 6.4 | 6.5 | 6.2 |
| votes for office | | | | 34.9 | 36.2 | 39.4 | 39.4 | | 44.2 | 44.1 | 44.1 |
| **District 6 (Wayne)** | | | | | | | | | | | |
| Erika Geiss | D | AA | 61.4% | | 107.3 | 99.4 | 92.8 | | 42.6 | 43.8 | 47.8 |
| Brenda Jones | R | AA | 38.7% | | -7.2 | 0.5 | 7.2 | | 57.4 | 56.4 | 52.3 |
| votes for office | | | | | 38.3 | 35.9 | 35.9 | | 50.0 | 52.9 | 52.9 |

Def. App. 095a

**2018 General: State Senate Districts**

| | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **District 11 (Oakland)** | | | | | | | | | | | |
| Jeremy Moss | D | W | 76.7% | | 99.0 | 99.2 | 96.3 | 80.9 | 60.2 | 56.9 | 60.2 |
| Boris Tuman | R | W | 20.9% | | 0.0 | 0.4 | 2.0 | 17.5 | 36.0 | 39.2 | 36.6 |
| others | | | 12.4% | | 1.0 | 1.0 | 1.7 | 1.6 | 3.7 | 3.8 | 3.2 |
| votes for office | | | | | 60.6 | 63.4 | 63.4 | 83.7 | 59.9 | 60.1 | 60.1 |
| | | | | | | | | | | | |
| **District 12 (Oakland)** | | | | | | | | | | | |
| Rosemary Bayer | D | W | 49.4% | | 122.0 | 99.6 | 87.9 | | 33.2 | 33.3 | 42.1 |
| Michael D. McCready | R | W | 48.6% | | -23.8 | 0.6 | 4.6 | | 64.9 | 64.2 | 56.7 |
| others | | | 2.0% | | 1.7 | 2.0 | 7.4 | | 2.0 | 2.0 | 1.2 |
| votes for office | | | | | 14.5 | 25.6 | 25.6 | | 75.1 | 74.4 | 74.4 |
| | | | | | | | | | | | |
| **District 27 (Genesee)** | | | | | | | | | | | |
| Jim Ananich | D | W | 71.2% | 97.6 | 103.0 | 99.3 | 97.7 | 53.9 | 53.3 | 54.2 | 55.6 |
| Donna Kekesis | R | W | 28.8% | 2.4 | -3.0 | 0.7 | 2.3 | 46.1 | 46.7 | 45.8 | 44.4 |
| votes for office | | | | 53.7 | 46.5 | 50.5 | 50.5 | 58.7 | 46.9 | 49.9 | 49.9 |
| | | | | | | | | | | | |
| **District 32 (Genesee and Saginaw)** | | | | | | | | | | | |
| Phil Phelps | D | W | 44.5% | | 113.0 | 99.7 | 96.1 | | 29.5 | 30.1 | 33.5 |
| Ken Horn | R | W | 55.5% | | -13.0 | 0.4 | 3.9 | | 70.5 | 69.9 | 66.5 |
| votes for office | | | | | 37.9 | 37.6 | 37.6 | | 61.4 | 62.3 | 62.3 |

Def. App. 096a

| 2018 General: State House Districts | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **District 1 (Wayne)** | | | | | | | | | | | |
| Tenisha Yancey | D | AA | 72.9% | 96.3 | 101.0 | 99.1 | 97.3 | | 33.3 | 36.2 | 47.0 |
| Mark Corcoran | R | W | 25.0% | 2.2 | -2.5 | 0.5 | 1.7 | | 63.8 | 59.7 | 49.5 |
| others | | | 2.1% | 1.5 | 1.5 | 1.6 | 0.9 | | 2.9 | 3.9 | 3.5 |
| *votes for office* | | | | *30.5* | *28.8* | *30.1* | *30.1* | | *81.0* | *80.4* | *80.4* |
| **District 2 (Wayne)** | | | | | | | | | | | |
| Joe Tate | D | AA | 73.5% | 97.4 | 101.5 | 98.8 | 98.8 | 41.6 | 46.8 | 47.2 | 53.0 |
| John Palffy | R | W | 26.5% | 2.6 | -1.4 | 1.1 | 1.2 | 58.5 | 53.1 | 53.1 | 47.0 |
| *votes for office* | | | | *33.9* | *26.9* | *28.3* | *28.3* | *74.0* | *77.0* | *78.2* | *78.2* |
| **District 3 (Wayne)** | | | | | | | | | | | |
| Wendell L. Byrd | D | AA | 96.7% | | 97.4 | 97.8 | 98.8 | | 89.6 | 87.3 | 80.4 |
| Dolores Brodersen | R | | 3.3% | | 2.6 | 2.2 | 1.2 | | 10.5 | 12.3 | 19.6 |
| *votes for office* | | | | | *28.5* | *32.0* | *32.0* | | *76.7* | *67.4* | *67.4* |
| **District 4 (Wayne)** | | | | | | | | | | | |
| Isaac Robinson | D | W | 94.6% | 97.6 | 97.3 | 97.7 | 97.2 | | 89.5 | 86.3 | 85.5 |
| Howard Weathington | R | AA | 5.4% | 2.4 | 2.7 | 2.2 | 2.8 | | 10.4 | 13.6 | 14.5 |
| *votes for office* | | | | *27.0* | *30.1* | *30.3* | *30.3* | | *24.5* | *24.1* | *24.1* |
| **State House District 5** | | | | | | | | | | | |
| Cynthia A. Johnson | D | AA | 92.5% | 97.0 | 97.8 | 98.2 | 97.7 | | 72.4 | 62.2 | na |
| Dorothy Patterson | R | | 5.5% | 3.0 | 2.2 | 2.0 | 2.4 | | 27.8 | 37.8 | na |
| *votes for office* | | | | *29.8* | *30.2* | *31.3* | *31.3* | | *na* | *na* | |
| **District 6 (Wayne)** | | | | | | | | | | | |
| Tyrone Carter | D | AA | 91.1% | 95.6 | 98.4 | 98.2 | 96.3 | | 66.3 | 65.0 | 66.0 |
| Linda Sawyer | R | W | 8.9% | 4.4 | 1.7 | 1.9 | 3.7 | | 33.5 | 35.0 | 34.0 |
| *votes for office* | | | | *34.9* | *35.3* | *38.2* | *38.2* | | *18.2* | *25.3* | *25.3* |

| 2018 General: State House Districts | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **District 7 (Wayne)** | | | | insufficient white voters to produce estimates of voting patterns by race | | | | | | | |
| LaTanya Garrett | D | AA | 97.6% | | | | | | | | |
| Marcelis Turner | R | AA | 2.4% | | | | | | | | |
| others | | | | | | | | | | | |
| votes for office | | | | | | | | | | | |
| **District 8 (Wayne)** | | | | insufficient white voters to produce estimates of voting patterns by race | | | | | | | |
| Sherry Gay Dagnogo | D | AA | 96.4% | | | | | | | | |
| Valerie R. Parker | R | AA | 3.7% | | | | | | | | |
| others | | | | | | | | | | | |
| votes for office | | | | | | | | | | | |
| **District 9 (Wayne)** | | | | | | | | | | | |
| Karen Whitsett | D | AA | 95.1% | | 97.5 | 97.7 | 98.5 | | 85.2 | 84.1 | 78.8 |
| James Stephens | R | | 4.9% | | 2.5 | 2.3 | 1.5 | | 14.8 | 16.0 | 21.2 |
| votes for office | | | | | 30.8 | 31.4 | 31.4 | | 18.1 | 17.6 | 17.6 |
| **District 10 (Wayne)** | | | | | | | | | | | |
| Leslie Love | D | AA | 84.0% | | 99.1 | 98.7 | 96.7 | | 48.3 | 48.8 | 59.3 |
| William Brang | R | W | 14.2% | | -0.3 | 0.6 | 2.2 | | 47.8 | 46.1 | 37.5 |
| others | | | 1.8% | | 1.2 | 1.2 | 1.2 | | 3.9 | 3.6 | 3.3 |
| votes for office | | | | | 33.4 | 34.8 | 34.8 | | 65.1 | 69.4 | 69.4 |
| **District 11 (Wayne)** | | | | | | | | | | | |
| Jewell Jones | D | AA | 66.9% | | 106.0 | 99.2 | 96.2 | | 50.4 | 51.0 | 51.9 |
| James Townsend | R | W | 33.1% | | -6.0 | 0.8 | 3.8 | | 49.8 | 49.1 | 48.1 |
| votes for office | | | | | 37.9 | 38.9 | 38.9 | | 44.9 | 45.2 | 45.2 |
| **District 12 (Wayne)** | | | | | | | | | | | |
| Alex Garza | D | H | 66.6% | | 104.7 | 98.8 | 90.6 | | 43.9 | 46.3 | 49.0 |
| Michelle Bailey | R | W | 33.4% | | -4.7 | 1.1 | 9.4 | | 56.1 | 54.1 | 51.0 |
| votes for office | | | | | 47.8 | 48.0 | 48.0 | | 41.8 | 42.8 | 42.8 |

**2018 General: State House Districts**

| | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **District 16 (Wayne)** | | | | | | | | | | | |
| Kevin Coleman | D | W | 67.3% | | 111.8 | 99.1 | 81.5 | | 50.2 | 51.5 | 60.1 |
| Jody Rice-White | R | W | 32.8% | | -11.9 | 1.1 | 18.5 | | 49.8 | 48.9 | 39.9 |
| votes for office | | | | | 18.3 | 48.0 | 18.7 | | 56.1 | 57.0 | 57.0 |
| | | | | | | | | | | | |
| **District 27 (Oakland)** | | | | | | | | | | | |
| Robert Wittenberg | D | W | 78.5% | 75.4 | 96.3 | 97.6 | 93.0 | | 71.2 | 70.3 | 73.8 |
| Janet Flessland | R | W | 18.5% | 22.5 | 1.7 | 1.0 | 3.0 | | 35.6 | 26.2 | 24.3 |
| others | | | 3.0% | 2.0 | 2.1 | 2.1 | 4.0 | | 3.2 | 3.4 | 1.9 |
| votes for office | | | | 78.1 | 53.6 | 58.1 | 58.1 | | 67.4 | 65.8 | 65.8 |
| | | | | | | | | | | | |
| **District 29 (Oakland)** | | | | | | | | | | | |
| Brenda Carter | D | AA | 74.1% | | 114.5 | 99.2 | 94.5 | | 36.7 | 41.8 | 54.6 |
| Timothy D. Carrier | R | W | 25.9% | | -14.5 | 1.1 | 5.5 | | 63.1 | 58.3 | 45.4 |
| votes for office | | | | | 32.8 | 46.3 | 46.3 | | 54.5 | 52.1 | 52.1 |
| | | | | | | | | | | | |
| **District 34 (Genesee)** | | | | | | | | | | | |
| Sheldon A. Neeley | D | AA | 90.0% | | 101.5 | 99.5 | 98.7 | | 58.9 | 64.0 | 46.7 |
| Henry Swift | R | W | 10.0% | | -1.4 | 0.5 | 9.3 | | 41.1 | 0.5 | 53.4 |
| votes for office | | | | | 52.6 | 54.7 | 54.7 | | 18.8 | 22.1 | 22.1 |
| | | | | | | | | | | | |
| **District 35 (Oakland)** | | | | | | | | | | | |
| Kyra Harris Bolden | D | AA | 85.5% | | 102.7 | 99.6 | 98.2 | | 53.5 | 57.2 | 63.1 |
| Theodore Alfonsetti III | R | W | 14.6% | | -2.7 | 0.3 | 1.8 | | 46.5 | 42.9 | 36.9 |
| votes for office | | | | | 56.1 | 55.6 | 55.6 | | 74.5 | 77.2 | 77.2 |
| | | | | | | | | | | | |
| **District 37 (Oakland)** | | | | | | | | | | | |
| Christine Greig | D | W | 67.2% | | 111.4 | 98.2 | 69.5 | | 59.6 | 61.5 | 68.2 |
| Mitch Swoboda | R | W | 32.8% | | -11.2 | 2.2 | 30.5 | | 40.6 | 38.7 | 31.8 |
| votes for office | | | | | 34.8 | 35.6 | 35.6 | | 85.0 | 82.3 | 82.3 |

Def. App. 099a

| 2018 General: State House Districts | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **District 49 (Genesee)** | | | | | | | | | | | |
| John D. Cherry | D | W | 72.4% | | 104.9 | 99.2 | 94.1 | | 55.6 | 57.2 | 61.4 |
| Patrick Duvendeck | R | W | 27.6% | | -5.0 | 0.8 | 6.0 | | 44.4 | 42.7 | 38.7 |
| votes for office | | | | | 40.0 | 42.3 | 42.3 | | 53.0 | 57.8 | 57.8 |
| | | | | | | | | | | | |
| **District 95 (Saginaw)** | | | | | | | | | | | |
| Vanessa Guerra | D | H | 73.1% | | 109.8 | 99.0 | 96.0 | | 43.3 | 47.3 | 50.5 |
| Dorothy Tanner | R | W | 26.9% | | -9.9 | 0.8 | 4.0 | | 56.7 | 52.8 | 49.5 |
| votes for office | | | | | 44.9 | 46.1 | 46.1 | | 50.1 | 49.4 | 49.4 |

| 2020 General: State House Districts | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **District 1 (Wayne)** | | | | | | | | | | | |
| Tenisha R. Yancey | D | AA | 75.8% | 94.9 | 99.4 | 97.3 | 98.3 | | 38.0 | 42.2 | 46.9 |
| Latricia Ann Lanier | R | AA | 22.2% | 3.7 | -0.7 | 1.5 | 0.9 | | 59.0 | 55.7 | 49.5 |
| others | | | 2.0% | 1.4 | 1.3 | 1.0 | 0.8 | | 3.0 | 3.1 | 3.6 |
| *votes for office* | | | | *53.8* | *52.3* | *53.0* | *53.0* | | *94.2* | *92.4* | *92.4* |
| **District 2 (Wayne)** | | | | | | | | | | | |
| Joe Tate | D | AA | 74.1% | 93.5 | 96.8 | 95.0 | 95.9 | 46.0 | 50.7 | 50.9 | 54.6 |
| Mayra Rodriguez | R | H | 23.8% | 3.2 | -0.2 | 1.3 | 1.0 | 53.1 | 48.7 | 47.9 | 44.4 |
| others | | | 2.1% | 3.3 | 3.5 | 3.5 | 3.0 | 1.0 | 0.7 | 0.7 | 1.1 |
| *votes for office* | | | | *55.8* | *51.5* | *51.9* | *51.9* | *89.8* | *92.0* | *92.9* | *92.9* |
| **District 3 (Wayne)** | | | | | | | | | | | |
| Shri Thanedar | D | A | 93.3% | | 95.0 | 95.0 | 97.7 | | 73.1 | 72.9 | 55.4 |
| Anita Vinson | R | AA | 4.0% | | 3.3 | 3.3 | 1.4 | | 12.3 | 12.6 | 25.1 |
| others | | | 2.7% | | 1.6 | 1.8 | 0.9 | | 14.5 | 12.9 | 19.5 |
| *votes for office* | | | | | *50.8* | *55.8* | *55.8* | | *117.2* | *97.7* | *97.7* |
| **District 4 (Wayne)** | | | | | | | | | | | |
| Abraham Aiyash | D | ME | 89.8% | | 95.9 | 96.7 | 95.5 | | 92.9 | 90.3 | 86.6 |
| Howard Weatherington | R | AA | 5.7% | | 1.1 | 1.3 | 1.8 | | 5.7 | 7.6 | 8.7 |
| others | | | 4.5% | | 3.0 | 3.0 | 2.8 | | 1.3 | 1.4 | 4.7 |
| *votes for office* | | | | | *89.7* | *90.1* | *90.1* | | *57.7* | *68.1* | *68.1* |
| **District 5 (Wayne)** | | | | | | | | | | | |
| Cynthia A. Johnson | D | AA | 93.0% | 97.3 | 98.0 | 98.0 | 98.3 | 73.2 | 73.2 | 69.1 | na |
| Harold M. Day | R | | 2.3% | 2.7 | 2.1 | 2.0 | 1.7 | 27.1 | 27.1 | 32.7 | na |
| *votes for office* | | | | *54.3* | *55.7* | *56.9* | *56.9* | *na* | *na* | | |
| **District 6 (Wayne)** | | | | | | | | | | | |
| Tyrone Carter | D | AA | 100% | | | | | | | | |
| *votes for office* | | | | | | | | | | | |

Def. App. 101a

| 2020 General: State House Districts | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **District 7 (Wayne)** | | | | insufficient white voters to produce estimates of voting patterns by race | | | | | | | |
| Helena Scott | D | AA | 93.0% | | | | | | | | |
| Ronald Cole | R | | 2.3% | | | | | | | | |
| others | | | 4.7% | | | | | | | | |
| *votes for office* | | | | | | | | | | | |
| **District 8 (Wayne)** | | | | insufficient white voters to produce estimates of voting patterns by race | | | | | | | |
| Stephanie A. Young | D | AA | 96.7% | | | | | | | | |
| Miroslawa Teresa Gorak | R | W | 3.3% | | | | | | | | |
| *votes for office* | | | | | | | | | | | |
| **District 9 (Wayne)** | | | | | | | | | | | |
| Karen Whitsett | D | AA | 94.2% | | 96.5 | 96.5 | 97.2 | | 83.7 | 83.4 | 75.4 |
| James Stephens | R | | 5.8% | | 3.5 | 3.4 | 2.8 | | 16.3 | 16.1 | 24.5 |
| *votes for office* | | | | | 56.3 | 57.3 | 57.3 | | 29.7 | 27.1 | 27.1 |
| **District 10 (Wayne)** | | | | | | | | | | | |
| Mary Cavanagh | D | H | 84.8% | | 99.1 | 98.9 | 98.3 | | 51.1 | 50.8 | 53.7 |
| Cathy L. Alcorn | R | | 15.3% | | 0.9 | 1.1 | 1.7 | | 48.9 | 49.4 | 46.3 |
| *votes for office* | | | | | 62.9 | 65.3 | 65.3 | | 69.1 | 68.3 | 68.3 |
| **District 11 (Wayne)** | | | | | | | | | | | |
| Jewell Jones | D | AA | 65.2% | | 104.7 | 99.0 | 96.9 | | 48.8 | 48.5 | 50.7 |
| James C. Townsend | R | W | 34.8% | | -4.6 | 1.0 | 3.1 | | 51.2 | 51.5 | 49.3 |
| *votes for office* | | | | | 53.0 | 53.5 | 53.5 | | 62.1 | 63.2 | 63.2 |
| **District 12 (Wayne)** | | | | | | | | | | | |
| Alex Garza | D | H | 62.4% | | 103.0 | 99.4 | 91.8 | | 38.2 | 38.8 | 41.4 |
| Michelle Bailey | R | W | 37.7% | | -3.0 | 0.6 | 8.2 | | 61.8 | 60.9 | 58.6 |
| *votes for office* | | | | | 64.7 | 66.4 | 66.4 | | 57.9 | 57.9 | 57.9 |

Def. App. 102a

| 2020 General: State House Districts | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **District 16 (Wayne)** | | | | | | | | | | | |
| Kevin Coleman | D | W | 62.5% | | 111.3 | 99.0 | 84.8 | | 44.4 | 45.6 | 54.2 |
| Emily Bauman | R | W | 37.5% | | -11.4 | 1.0 | 15.2 | | 55.7 | 54.4 | 45.8 |
| votes for office | | | | | 29.9 | 33.5 | 33.5 | | 75.1 | 76.0 | 76.0 |
| | | | | | | | | | | | |
| **District 27 (Oakland)** | | | | | | | | | | | |
| Regina Weiss | D | W | 74.4% | 68.7 | 95.4 | 97.3 | 93.3 | | 64.2 | 63.4 | 66.4 |
| Elizabeth Goss | R | W | 22.4% | 28.8 | 2.6 | 1.5 | 3.9 | | 32.0 | 32.5 | 30.6 |
| others | | | 3.2% | 2.5 | 1.7 | 1.6 | 2.8 | | 3.9 | 4.1 | 33.0 |
| votes for office | | | | 88.1 | 73.8 | 76.6 | 76.6 | | 77.7 | 77.4 | 77.4 |
| | | | | | | | | | | | |
| **District 29 (Oakland)** | | | | | | | | | | | |
| Brenda Carter | D | AA | 72.9% | | 111.1 | 99.1 | 94.7 | | 37.1 | 38.8 | 51.3 |
| S. Dave Sullivan | R | W | 27.1% | | -11.0 | 0.8 | 53.3 | | 62.7 | 61.5 | 48.7 |
| votes for office | | | | | 47.6 | 61.1 | 61.1 | | 67.5 | 61.5 | 61.5 |
| | | | | | | | | | | | |
| **District 34 (Oakland)** | | | | | | | | | | | |
| Cynthia R. Neeley | D | AA | 86.7% | | 100.5 | 99.2 | 98.3 | | 51.6 | 56.1 | 45.9 |
| James Miraglia | R | W | 13.3% | | -4.8 | 0.7 | 1.7 | | 48.4 | 43.8 | 54.1 |
| votes for office | | | | | 65.6 | 67.6 | 67.6 | | 32.5 | 36.8 | 36.8 |
| | | | | | | | | | | | |
| **District 35 (Oakland)** | | | | | | | | | | | |
| Kyra Harris Bolden | D | AA | 82.9% | | 99.8 | 99.4 | 97.2 | | 51.5 | 51.2 | 58.5 |
| Daniela Davis | R | AA | 15.9% | | -0.4 | 0.3 | 2.3 | | 46.4 | 46.2 | 39.3 |
| others | | | 1.0% | | 0.6 | 0.5 | 0.5 | | 2.1 | 2.4 | 2.2 |
| votes for office | | | | | 70.1 | 68.4 | 68.4 | | 93.4 | 94.5 | 94.5 |
| | | | | | | | | | | | |
| **District 37 (Oakland)** | | | | | | | | | | | |
| Samantha Steckloff | D | W | 63.9% | | 106.1 | 96.4 | 57.5 | | 56.8 | 56.9 | 66.4 |
| Mitch Swoboda | R | W | 34.1% | | -8.7 | 0.8 | 34.2 | | 41.7 | 40.8 | 32.2 |
| others | | | 2.0% | | 2.5 | 6.3 | 8.3 | | 1.7 | 1.3 | 1.4 |
| votes for office | | | | | 55.5 | 54.9 | 54.9 | | 106.2 | 94.0 | 94.0 |

Def. App. 103a

| 2020 General: State House Districts | Party | Race | Vote | Estimates for Black Voters | | | | Estimates for White Voters | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | HP | ER | EI 2x2 | EI RxC | HP | ER | EI 2x2 | EI RxC |
| **District 49 (Genesee)** | | | | | | | | | | | |
| John D. Cherry | D | W | 68.9% | | 104.3 | 98.8 | 94.8 | | 50.2 | 51.9 | 56.6 |
| Bryan Lutz | R | W | 31.1% | | -4.3 | 1.0 | 5.2 | | 49.8 | 48.3 | 43.6 |
| votes for office | | | | | 52.5 | 60.7 | 60.7 | | 68.0 | 69.1 | 69.1 |
| | | | | | | | | | | | |
| **District 95 (Saginaw)** | | | | | | | | | | | |
| Amos O'Neal | D | AA | 70.1% | | 111.7 | 99.2 | 96.6 | | 34.7 | 41.1 | 42.7 |
| Charlotte DeMaet | R | W | 29.9% | | -11.5 | 0.9 | 3.4 | | 65.2 | 58.9 | 57.3 |
| votes for office | | | | | 59.0 | 60.6 | 60.6 | | 62.9 | 61.5 | 61.5 |

Def. App. 104a

| Recent Democratic Primaries: Congress | Race | Vote | Estimates for Black Voters | | | Estimates for White Voters | | |
|---|---|---|---|---|---|---|---|---|
| | | | HP | ER | EI | HP | ER | EI |
| **2018** | | | | | | | | |
| **Congressional District 13** | | | | | | | | |
| Ian Conyers | B | 6.6 | 8.3 | 9.1 | 9.3 | | 1.3 | 1.1 |
| Shanelle Jackson | B | 5.4 | 7.7 | 7.1 | 7.5 | | 1.6 | 1.2 |
| Brenda Jones | B | 30.2 | 42.5 | 43.7 | 43.5 | | 2.9 | 5.3 |
| Rashinda Tlaib | ME | 31.2 | 22.3 | 21.3 | 22.4 | | 48.1 | 45.3 |
| Bill Wild | W | 14.1 | 1.6 | -1.4 | 0.7 | | 46.2 | 43.9 |
| Coleman Young II | B | 12.5 | 17.7 | 20.1 | 18.9 | | -0.3 | 1.1 |
| *turnout of VAP* | | | *23.0* | *22.2* | *24.3* | | *12.2* | *14.1* |
| | | | | | | | | |
| **2020** | | | | | | | | |
| **Congressional District 12** | | | | | | | | |
| Debbie Dingell | W | 80.9 | | 81.4 | 81.2 | | 87.9 | 87.7 |
| Solomon Rajput | A | 19.1 | | 18.9 | 19.0 | | 12.1 | 12.2 |
| *turnout of VAP* | | | | *18.8* | *24.2* | | *13.6* | *13.1* |
| | | | | | | | | |
| **Congressional District 13** | | | | | | | | |
| Brenda Jones | B | 33.7 | 37.8 | 37.7 | 37.3 | | 27.0 | 27.9 |
| Rashida Tlaib | ME | 66.3 | 62.2 | 62.3 | 62.7 | | 72.9 | 72.1 |
| *turnout of VAP* | | | *28.0* | *26.7* | *29.5* | | *14.1* | *15.8* |
| | | | | | | | | |
| **Congressional District 14** | | | | | | | | |
| Brenda Lawrence | B | 93.2 | 92.7 | 92.7 | 92.8 | 92.1 | 91.6 | 92.0 |
| Terrance Morrison | | 6.8 | 7.3 | 7.3 | 7.5 | 7.9 | 8.4 | 8.7 |
| *turnout of VAP* | | | *25.9* | *23.7* | *28.0* | *22.4* | *13.3* | *18.5* |

| Recent Democratic Primaries:<br>2018 State Senate | | | Estimates for Black Voters | | | Estimates for White Voters | | |
|---|---|---|---|---|---|---|---|---|
| | Race | Vote | HP | ER | EI | HP | ER | EI |
| **State Senate District 1 (Wayne)** | | | | | | | | |
| Stephanie Chang | A | 49.8 | 24.6 | 23.5 | 27.1 | 71.6 | 79.2 | 76.7 |
| James Cole | B | 5.2 | 6.2 | 7.8 | 6.2 | 4.3 | 3.6 | 3.9 |
| Nicholas Rivera | H | 2.9 | 1.3 | 0.9 | 0.8 | 4.3 | 5.9 | 5.2 |
| Stephanie Roehm | | 4.4 | 2.1 | 1.0 | 1.5 | 8.6 | 9.9 | 8.7 |
| Bettie Cook Scott | B | 11.2 | 18.2 | 17.9 | 15.7 | 6.6 | 17.0 | 6.1 |
| Alberta Tinsley Talabi | B | 26.4 | 47.7 | 48.9 | 47.1 | 4.7 | -2.7 | 2.9 |
| *turnout of VAP* | | | *20.0* | *20.9* | *23.3* | *17.4* | *13.3* | *13.9* |
| | | | | | | | | |
| **State Senate District 3 (Wayne)** | | | | | | | | |
| Anita Belle | B | 14.3 | 23.7 | 25.5 | 25.4 | 4.9 | 1.9 | 1.9 |
| Terry Burrell | W | 5.5 | 8.5 | 8.6 | 8.4 | 3.9 | 2.1 | 2.2 |
| Sylvia Santana | B | 41.5 | 56.6 | 60.2 | 60.3 | 20.2 | 19.9 | 18.7 |
| Gary Woronchak | W | 38.7 | 11.2 | 5.7 | 8.0 | 71.0 | 76.2 | 76.0 |
| *turnout of VAP* | | | *18.7* | *16.8* | *17.9* | *17.2* | *17.3* | *17.8* |
| | | | | | | | | |
| **State Senate District 4 (Wayne)** | | | | | | | | |
| Marshall Bullock | B | 44.3 | 46.8 | 44.5 | 47.2 | | 39.2 | 38.6 |
| Fred Durhal | B | 38.3 | 39.4 | 42.6 | 40.6 | | 30.8 | 31.3 |
| Carron Pinkins | B | 17.5 | 13.8 | 12.8 | 12.6 | | 30.0 | 29.1 |
| *turnout of VAP* | | | *21.5* | *21.8* | *26.3* | | *8.7* | *10.5* |
| | | | | | | | | |
| **State Senate District 5 (Wayne)** | | | | | | | | |
| Betty Jean Alexander | B | 54.5 | 66.9 | 69.1 | 68.1 | | 27.2 | 27.5 |
| David Knezek | W | 45.5 | 33.1 | 30.9 | 31.9 | | 72.8 | 72.6 |
| *turnout of VAP* | | | *22.2* | *21.6* | *23.1* | | *10.7* | *11.4* |
| | | | | | | | | |
| **State Senate District 6** | | | | | | | | |
| Erika Geiss | B | 65.4 | | 86.1 | 89.5 | | 55.6 | 55.9 |
| Robert Kosowski | W | 34.6 | | 13.9 | 10.3 | | 44.4 | 44.0 |
| *turnout of VAP* | | | | *19.5* | *18.0* | | *12.4* | *14.3* |
| | | | | | | | | |
| **State Senate District 11 (Oakland)** | | | | | | | | |
| Crystal Bailey | B | 21.2 | 36.6 | 27.0 | 24.9 | 7.9 | 16.7 | 17.3 |
| Jeremy Moss | W | 51.8 | 35.4 | 49.0 | 53.1 | 78.1 | 51.9 | 51.0 |
| Vanessa Moss | B | 18.5 | 20.2 | 17.5 | 16.2 | 10.2 | 20.4 | 20.3 |
| James Turner | B | 8.6 | 7.8 | 6.5 | 5.8 | 3.7 | 11.0 | 10.9 |
| *turnout of VAP* | | | *29.0* | *30.8* | *33.4* | *43.3* | *20.5* | *20.6* |

# APPENDIX C

| Detroit area | | | Estimates for Hispanics | |
|---|---|---|---|---|
| | Party | Race | ER | EI 2x2 |
| **2020 General** | | | | |
| **U.S. President** | | | | |
| Joseph Biden | D | W | 75.4 | 76.0 |
| Donald Trump | R | W | 24.3 | 23.9 |
| others | | | 0.3 | 0.2 |
| *votes for office* | | | *13.9* | *14.8* |
| | | | | |
| **U.S. Senate** | | | | |
| Gary Peters | D | W | 73.6 | 74.8 |
| John James | R | W | 22.6 | 21.9 |
| others | | | 3.8 | 3.2 |
| *votes for office* | | | *13.5* | *14.6* |
| | | | | |
| **2018 General** | | | | |
| **Governor** | | | | |
| Gretchen Whitmer | D | W | 83.1 | 80.0 |
| Bill Schuette | R | W | 15.3 | 14.8 |
| others | | | 1.5 | 1.8 |
| *votes for office* | | | *3.5* | *5.1* |
| | | | | |
| **Secretary of State** | | | | |
| Jocelyn Benson | D | W | 84.0 | 82.6 |
| Mary Treder Lang | R | W | 14.4 | 13.5 |
| others | | | 1.7 | 14.0 |
| *votes for office* | | | *3.3* | *4.4* |
| | | | | |
| **Attorney General** | | | | |
| Dana Nessel | D | W | 80.1 | 78.9 |
| Tom Leonard | R | W | 16.4 | 15.2 |
| others | | | 3.4 | 3.7 |
| *votes for office* | | | *3.4* | *4.8* |

Def. App. 108a

| Detroit area | | | Estimates for Hispanics | |
|---|---|---|---|---|
| | Party | Race | ER | EI 2x2 |
| **U.S. Senate** | | | | |
| Debbie Stabenow | D | W | 82.5 | 82.2 |
| John James | R | W | 16.4 | 17.1 |
| others | | | 1.3 | 0.0 |
| *votes for office* | | | 3.3 | 4.5 |
| | | | | |
| **2018 Democratic Primary** | | | | |
| **Governor** | | | | |
| Abdul El-Sayed | D | ME | 55.5 | 58.5 |
| Shri Thanedar | D | A | 13.6 | 12.7 |
| Gretchen Whitmer | D | W | 30.8 | 28.7 |
| *votes for office* | | | -2.0 | 1.0 |

Def. App. 109a

| Grand Rapids area | Party | Race | Estimates for Hispanics | |
|---|---|---|---|---|
| | | | ER | EI 2x2 |
| **2020 General** | | | | |
| **U.S. President** | | | | |
| Joseph Biden | D | W | 98.6 | 94.8 |
| Donald Trump | R | W | 0.5 | 0.1 |
| others | | | 1.0 | 1.3 |
| *votes for office* | | | *0.0* | *8.6* |
| | | | | |
| **U.S. Senate** | | | | |
| Gary Peters | D | W | 96.1 | 93.3 |
| John James | R | W | -1.6 | 3.2 |
| others | | | 5.3 | 9.2 |
| *votes for office* | | | *0.0* | *7.3* |
| | | | | |
| **2018 General** | | | | |
| **Governor** | | | | |
| Gretchen Whitmer | D | W | 99.5 | 95.0 |
| Bill Schuette | R | W | -4.5 | 1.6 |
| others | | | 5.6 | 6.1 |
| *votes for office* | | | *-9.0* | *1.1* |
| | | | | |
| **Secretary of State** | | | | |
| Jocelyn Benson | D | W | 102.1 | 97.0 |
| Mary Treder Lang | R | W | -5.3 | 1.1 |
| others | | | 3.3 | 6.9 |
| *votes for office* | | | *-9.0* | *0.3* |
| | | | | |
| **Attorney General** | | | | |
| Dana Nessel | D | W | 97.2 | 93.1 |
| Tom Leonard | R | W | -6.4 | 1.2 |
| others | | | 9.3 | 9.8 |
| *votes for office* | | | *-9.0* | *0.8* |

Def. App. 110a

| Grand Rapids area | | | Estimates for Hispanics | |
|---|---|---|---|---|
| | Party | Race | ER | EI 2x2 |
| **U.S. Senate** | | | | |
| Debbie Stabenow | D | W | 97.2 | 93.2 |
| John James | R | W | -3.4 | 2.0 |
| others | | | 6.2 | 10.4 |
| *votes for office* | | | *-9.0* | *1.1* |
| | | | | |
| **2018 Democratic Primary** | | | | |
| **Governor** | | | | |
| Abdul El-Sayed | D | ME | 51.1 | 51.3 |
| Shri Thanedar | D | A | 39.8 | 42.4 |
| Gretchen Whitmer | D | W | 8.9 | 11.9 |
| *votes for office* | | | *-2.3* | *0.1* |

| | Party | Race | Estimates for Arab Americans | |
| --- | --- | --- | --- | --- |
| | | | ER | EI 2x2 |
| **2020 General** | | | | |
| **U.S. President** | | | | |
| Joseph Biden | D | W | 98.3 | 98.9 |
| Donald Trump | R | W | 1.3 | 0.8 |
| others | | | 0.6 | 1.0 |
| votes for office | | | *24.1* | *26.7* |
| | | | | |
| **U.S. Senate** | | | | |
| Gary Peters | D | W | 100.7 | 99.0 |
| John James | R | W | -2.9 | 0.8 |
| others | | | 2.1 | 2.1 |
| votes for office | | | *22.2* | *24.9* |
| | | | | |
| **2018 General** | | | | |
| **Governor** | | | | |
| Gretchen Whitmer | D | W | 103.9 | 99.3 |
| Bill Schuette | R | W | -6.2 | 1.1 |
| others | | | 2.5 | 2.1 |
| votes for office | | | *8.6* | *10.3* |
| | | | | |
| **Secretary of State** | | | | |
| Jocelyn Benson | D | W | 104.7 | 99.3 |
| Mary Treder Lang | R | W | -6.3 | 0.9 |
| others | | | 1.7 | 1.7 |
| votes for office | | | *8.5* | *9.8* |
| | | | | |
| **Attorney General** | | | | |
| Dana Nessel | D | W | 106.8 | 99.5 |
| Tom Leonard | R | W | -8.0 | 0.6 |
| others | | | 1.3 | 1.3 |
| votes for office | | | *8.6* | *10.1* |

| | Party | Race | Estimates for Arab Americans | |
| --- | --- | --- | --- | --- |
| | | | ER | EI 2x2 |
| **U.S. Senate** | | | | |
| Debbie Stabenow | D | W | 107.2 | 99.1 |
| John James | R | W | -9.0 | 1.1 |
| others | | | 1.9 | 1.9 |
| *votes for office* | | | *8.4* | *10.0* |
| | | | | |
| **2018 Democratic Primary** | | | | |
| **Governor** | | | | |
| Abdul El-Sayed | D | ME | 116.4 | 92.8 |
| Shri Thanedar | D | A | -0.3 | 0.2 |
| Gretchen Whitmer | D | W | -16.0 | 0.6 |
| *votes for office* | | | *15.0* | *15.1* |

Def. App. 113a

|  | Party | Race | Estimates for Chaldeans | |
|---|---|---|---|---|
|  |  |  | ER | EI 2x2 |
| **2020 General** |  |  |  |  |
| **U.S. President** |  |  |  |  |
| Joseph Biden | D | W | 19.5 | 20.5 |
| Donald Trump | R | W | 81.9 | 80.3 |
| others |  |  | -0.8 | 2.0 |
| *votes for office* |  |  | *31.2* | *29.6* |
|  |  |  |  |  |
| **U.S. Senate** |  |  |  |  |
| Gary Peters | D | W | 26.3 | 26.2 |
| John James | R | W | 74.0 | 72.8 |
| others |  |  | -0.6 | 0.2 |
| *votes for office* |  |  | *27.9* | *27.2* |
|  |  |  |  |  |
| **2018 General** |  |  |  |  |
| **Governor** |  |  |  |  |
| Gretchen Whitmer | D | W | 52.9 | 48.9 |
| Bill Schuette | R | W | 47.9 | 47.4 |
| others |  |  | 0.2 | 8.0 |
| *votes for office* |  |  | *-12.2* | *0.0* |
|  |  |  |  |  |
| **Secretary of State** |  |  |  |  |
| Jocelyn Benson | D | W | 55.3 | 53.7 |
| Mary Treder Lang | R | W | 44.7 | 42.0 |
| others |  |  | 0.4 | 7.9 |
| *votes for office* |  |  | *-10.8* | *0.3* |
|  |  |  |  |  |
| **Attorney General** |  |  |  |  |
| Dana Nessel | D | W | 52.5 | 48.0 |
| Tom Leonard | R | W | 47.4 | 47.4 |
| others |  |  | 0.4 | 0.1 |
| *votes for office* |  |  | *-10.3* | *2.5* |

Def. App. 114a

| | Party | Race | Estimates for Chaldeans | |
| --- | --- | --- | --- | --- |
| | | | ER | EI 2x2 |
| **U.S. Senate** | | | | |
| Debbie Stabenow | D | W | 55.2 | 55.6 |
| John James | R | W | 43.2 | 44.0 |
| others | | | 0.7 | 0.9 |
| *votes for office* | | | *-11.4* | *0.4* |
| | | | | |
| **2018 Democratic Primary** | | | | |
| **Governor** | | | | |
| Abdul El-Sayed | D | ME | 50.1 | na |
| Shri Thanedar | D | A | 11.2 | na |
| Gretchen Whitmer | D | W | 38.7 | na |
| *votes for office* | | | *-1.1* | *0.1* |

| | Party | Race | Estimates for Bangladeshi Americans | |
| --- | --- | --- | --- | --- |
| | | | ER | EI 2x2 |
| **2020 General** | | | | |
| **U.S. President** | | | | |
| Joseph Biden | D | W | 104.7 | 96.1 |
| Donald Trump | R | W | -4.4 | 3.2 |
| others | | | 0.1 | 0.1 |
| votes for office | | | 31.6 | 25.2 |
| | | | | |
| **U.S. Senate** | | | | |
| Gary Peters | D | W | 104.4 | 96.2 |
| John James | R | W | -5.2 | 3.3 |
| others | | | 0.9 | 1.1 |
| votes for office | | | 31.6 | 24.6 |
| | | | | |
| **2018 General** | | | | |
| **Governor** | | | | |
| Gretchen Whitmer | D | W | 105.7 | 99.1 |
| Bill Schuette | R | W | -7.4 | 1.1 |
| others | | | 1.1 | 1.1 |
| votes for office | | | 13.7 | 18.7 |
| | | | | |
| **Secretary of State** | | | | |
| Jocelyn Benson | D | W | 105.7 | 98.9 |
| Mary Treder Lang | R | W | -7.1 | 1.3 |
| others | | | 2.5 | 2.4 |
| votes for office | | | 13.9 | 19.3 |
| | | | | |
| **Attorney General** | | | | |
| Dana Nessel | D | W | 107.5 | 98.2 |
| Tom Leonard | R | W | -8.0 | 0.7 |
| others | | | 2.3 | 2.3 |
| votes for office | | | 13.8 | 19.2 |

Def. App. 116a

| | Party | Race | Estimates for Bangladeshi Americans | |
|---|---|---|---|---|
| | | | ER | EI 2x2 |
| **U.S. Senate** | | | | |
| Debbie Stabenow | D | W | 107.1 | 99.1 |
| John James | R | W | -7.7 | 0.9 |
| others | | | 1.7 | 0.7 |
| *votes for office* | | | *13.9* | *18.4* |
| | | | | |
| **2018 Democratic Primary** | | | | |
| **Governor** | | | | |
| Abdul El-Sayed | D | ME | 98.8 | 97.3 |
| Shri Thanedar | D | A | 6.5 | 5.1 |
| Gretchen Whitmer | D | W | -5.2 | 4.5 |
| *votes for office* | | | *16.4* | *14.7* |

**Michigan Independent Citizens Redistricting Commission**                    ≡

MICRC / MEETING NOTICES & MATERIALS

# Meeting Notices & Materials

> 2021 Meeting and Hearing Schedule
> Watch Past Meeting of the ICRC

**Important Commission Documents**

- Redistricting 101
- Redistricting 201
- MICRC Mapping Process
- Communications with the Public
- Code of Conduct
- Amended Rules of Procedure (Adopted and Effective Jan. 13, 2022)
- FOIA Policies
- Racially Polarized Voting Analysis

SUBSCRIBE TO STAY UPDATED ON UPCOMING COMMISSION MEETINGS

**MICRC Meeting - Detroit, MI - Jan. 13, 2022**
Meeting Notice - Jan. 13, 2022
Meeting Agenda - Jan. 13, 2022
Approved Minutes -
Proposed Minutes -
Written Public Comment - Jan. 13, 2022
Transcript -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Kellom
> Proposed Amendment submitted Jan. 10, 2022
> Amended Rules of Procedure - Draft - Jan. 10, 2022
> Resolution Jan. 01, 2022 Amend Rules of Procedure
> 2022 Budget Approved Dec. 16, 2021
> Resolution Jan. 02, 2022 Rescind Remote and Hybrid Meetings Policies and Procedures

✕

∧

Def. App. 118a

> Resolution Jan. 01, Issue Bid Requests for Video
> Resolutions Dec. 06, 2021 through Dec. 14, 2021 adopted Dec. 28, 2021
> Statement of Work Lessons Learned

**MICRC Closed Session Meeting - East Lansing, MI - Oct. 27, 2021**
Minutes closed session - **Final - Submitted Jan. 10, 2022**

**Dr. Lisa Handley Racially Polarized Voting Final Report Jan. 4, 2021**
Final Report

**MICRC Meeting - Lansing, MI - Dec. 28, 2021**
Meeting Notice - **Dec. 28, 2021**
Meeting Agenda - **Dec. 28, 2021**
Approved Minutes -
Proposed Minutes - **Dec. 28, 2021**
Written Public Comment - **Dec. 28, 2021**
Transcript - **Dec. 28, 2021**
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Dr. Handley Final Report**
> **Resolution Extension of Robert Half Contract**
> **Summary of MSC Order Submitted Dec 25**
> **Correspondence from Commissioner Lange for Public Record**
> **P and C Memorandum re: Subsection 14**
> **Wagner-Gronda Attorney Letter**

**Legal Filings - Dec. 20, 2021**
> MCS 163823 Materials

**MICRC Meeting - Detroit, MI - Dec. 16, 2021**
Meeting Notice - **Dec. 16, 2021**
Meeting Agenda - **Dec. 16, 2021**
Approved Minutes -
Proposed Minutes - **Dec. 16, 2021**
Written Public Comment - **Dec. 16, 2021**
Transcript - **Dec. 16, 2021**
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Clark**

> Remote Attendance Notice - Orton
> Mapping Process and Procedures v 11.6 APPROVED Nov. 8
> Approval of Amended Rules of Procedure
> Proposed Amendments to Rules of Procedure Sept 30
> 2022 Budget Approved 2021/11/18 with two 6 month subsets
> Commission Final Vote Draft v12.21
> Resolution 2021/12/01 Approve Commission Final Vote Process and Updated Mapping Process
> Resolutions 2021/12/02-05 from Dec 2 Mtg
> Braille Maps 2021/11/29 Final Proof Part 1
> Braille Maps 2021/11/29 Final Proof Part 2

**Legal Filings - Dec. 13, 2021**
> MSC Order re: scheduling
> Defendant's Answer to Complaint
> Defendant's Brief in Support of Answer

**Legal Filings - Dec. 7, 2021**
> Plaintiffs' Emergency Verified Complaint
> Brief in Support of Plaintiffs' Complaint
> Exhibits to Emergency Verified Complaint

**MICRC Meeting - Lansing, MI - Dec. 2, 2021**
Meeting Notice - **Dec. 2, 2021**
Meeting Agenda - **Dec. 2, 2021**
Approved Minutes -
Proposed Minutes - **Dec. 2, 2021**
Written Public Comment -
Transcript - **Dec. 2, 2021**
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Kellom
> Remote Attendance Notice - Clark
> Letter submitted Nov. 30
> Budget approved Nov. 18 with recommendation for +9 Meetings
> Commission Final Vote Draft v12-1-21
> 2022 Budget Approved 2021/11/18 with two 6 month subsets

**MICRC Meeting - Ann Arbor, MI - Nov. 18, 2021**
Meeting Notice - **Nov. 18, 2021**
Meeting Agenda - **Nov. 18, 2021**
Approved Minutes -
Proposed Minutes - **Nov. 18, 2021**

Def. App. 120a

Written Public Comment -
Transcript -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **2022 Budget Approved October 20 2021 with DRAFT EDITS 2021-11-15**
> **CO Report 11-18-21**

**MICRC Meeting - East Lansing, MI - Nov. 8, 2021**
Meeting Notice - **Nov. 8, 2021**
Meeting Agenda - **Nov. 8, 2021**
Approved Minutes -
Proposed Minutes - **Nov. 8, 2021**
Written Public Comment -
Transcript -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Witjes**
> **Remote Attendance Notice - Szetela**
> **Remote Attendance Notice - Clark**
> **Remote Attendance Notice - Valette**
> **MICRC Mapping Process and Procedures v11.6 APPROVED 2021-11-08**

**MICRC Meeting - East Lansing, MI - Nov. 5, 2021**
Meeting Notice - **Nov. 5, 2021**
Meeting Agenda - **Nov. 5, 2021**
Approved Minutes -
Proposed Minutes - **Nov. 5, 2021**
Written Public Comment -
Transcript -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Szetela**
> **DRAFT v11.04 Mapping Process and Procedures with Edits Redlined**
> **DRAFT v11.04 Mapping Process and Procedures with Edits Accepted**

**Def. App. 121a**

**MICRC Meeting - East Lansing, MI - Nov. 4, 2021**

Meeting Notice - **Nov. 4, 2021**

Meeting Agenda - **Nov. 4, 2021**

Approved Minutes -

Proposed Minutes - **Nov. 4, 2021**

Written Public Comment -

Transcript -

Other Meeting Materials -

> **Remote Attendance Notice - Lange**

> **Remote Attendance Notice - Wagner**

> **Remote Attendance Notice - Curry**

> **Remote Attendance Notice - Kellom**

> **Braille Estimate Lighthouse**

> **Resolution 2021-11-02 Approve Braille Vendor**

**MICRC Meeting - East Lansing, MI - Nov. 3, 2021**

Meeting Notice - **Nov. 3, 2021**

Meeting Agenda - **Nov. 3, 2021**

Approved Minutes -

Proposed Minutes - **Nov. 3, 2021**

Written Public Comment -

Transcript -

Other Meeting Materials -

> **Remote Attendance Notice - Lange**

> **Remote Attendance Notice - Wagner**

> **Remote Attendance Notice - Curry**

> **Remote Attendance Notice - Kellom**

**MICRC Meeting - East Lansing, MI - Nov. 2, 2021**

Meeting Notice - **Nov. 2, 2021**

Meeting Agenda - **Nov. 2, 2021**

Approved Minutes -

Proposed Minutes - **Nov. 2, 2021**

Written Public Comment -

Transcript -

Other Meeting Materials -

> **Remote Attendance Notice - Lange**

> **Remote Attendance Notice - Wagner**

> **Remote Attendance Notice - Curry**

> **Remote Attendance Notice - Kellom**

> **DRAFT Appendix A to Fink Bressack Contract Nov. 2**

> **Resolution 2021-11-01 First Amendment to Fink Bressack Contract**

**Def. App. 122a**

**MICRC Meeting - East Lansing, MI - Nov. 1, 2021**
Meeting Notice - **Nov. 1, 2021**
Meeting Agenda - **Nov. 1, 2021**
Approved Minutes -
Proposed Minutes - **Nov. 1, 2021**
Written Public Comment -
Transcript - **Nov. 1, 2021**
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Handley PowerPoint on voting patterns - Nov. 1, 2021**

**MICRC Meeting - East Lansing, MI - Oct. 29, 2021**
Meeting Notice - **Oct. 29, 2021**
Meeting Agenda - **Oct. 29, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 29, 2021**
Written Public Comment -
Transcript - **Oct. 29, 2021**
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**

**MICRC Meeting - East Lansing, MI - Oct. 28, 2021**
Meeting Notice - **Oct. 28, 2021**
Meeting Agenda - **Oct. 28, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 28, 2021**
Written Public Comment -
Transcript - **Oct. 28, 2021**
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Compare SDs Overview**

**MICRC Closed Session Meeting - East Lansing, MI - Oct. 27, 2021**
Minutes closed session - **Final - Submitted Jan. 10, 2022**

**Def. App. 123a**

**MICRC Meeting - East Lansing, MI - Oct. 27, 2021**
Meeting Notice - **Oct. 27, 2021**
Meeting Agenda - **Oct. 27, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 27, 2021**
Written Public Comment - **Oct. 27, 2021**
Transcript - **Oct. 27, 2021**
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**

**MICRC Hearing - Flint, MI (Dort Financial Center) - Oct. 26, 2021**
Hearing Notice - **Oct. 26, 2021**
> **Oct. 26, 2021 - Spanish**
> **Oct. 26, 2021 - Arabic**
> **Oct. 26, 2021 - Bengali**
Hearing Agenda - **Oct. 26, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 26, 2021**
Written Public Comment -
Transcript - **Oct. 26, 2021**
Other Hearing Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Clark**

**MICRC Hearing - Gaylord, MI (Treetops Resort) - Oct. 25, 2021**
Hearing Notice - **Oct. 25, 2021**
> **Oct. 25, 2021 - Spanish**
> **Oct. 25, 2021 - Arabic**
> **Oct. 25, 2021 - Bengali**
Hearing Agenda - **Oct. 25, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 25, 2021**
Written Public Comment -
Transcript - **Oct. 25, 2021**
Other Hearing Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**

Def. App. 124a

> Remote Attendance Notice - Clark
> Remote Attendance Notice - Weiss
> Remote Attendance Notice - Szetela

**MICRC Hearing - Grand Rapids, MI (DeVos Place) - Oct. 22, 2021**

Hearing Notice - **Oct. 22, 2021**
> **Oct. 22, 2021 - Spanish**
> **Oct. 22, 2021 - Arabic**
> **Oct. 22, 2021 - Bengali**
Hearing Agenda - **Oct. 22, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 22, 2021**
Written Public Comment -
Transcript - **Oct. 22, 2021**
Other Hearing Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Kellom

**MICRC Hearing - Lansing, MI (Lansing Center) - Oct. 21, 2021**
Hearing Notice - **Oct. 21, 2021**
> **Oct. 21, 2021 - Spanish**
> **Oct. 21, 2021 - Arabic**
> **Oct 21, 2021 - Bengali**
Hearing Agenda - **Oct. 21, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 21, 2021**
Written Public Comment -
Transcript - **Oct. 21, 2021**
Other Hearing Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Kellom

**MICRC Hearing - Detroit, MI (TCF Center) - Oct. 20, 2021**
Hearing Notice - **Oct. 20, 2021**
> **Oct. 20, 2021 - Spanish**
> **Oct. 20, 2021 - Arabic**
> **Oct. 20, 2021 - Bengali**
Hearing Agenda - **Oct. 20, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 20, 2021**

Def. App. 125a

Written Public Comment -
Transcript - **Oct. 20, 2021**
Other Hearing Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Orton**
> **Compliance Analysis Tracking v10.18**
> **MPAP 9v10.10 Public Hearings and Debriefings**
> **Budget FY End 2021 w DRAFT 2022 Budget**

**MICRC Meeting - East Lansing, MI - Oct. 12, 2021**
Meeting Cancellation - **Oct. 12, 2021**
Meeting Notice - **Oct. 12, 2021** CANCELLED
Meeting Agenda -
Approved Minutes -
Proposed Minutes -
Written Public Comment -
Transcript -
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**

**MICRC Meeting - East Lansing, MI - Oct. 11, 2021**
Meeting Notice - **Oct, 11, 2021**
Meeting Agenda - **Oct. 11, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 11, 2021**
Written Public Comment -
Transcript - **Oct. 11, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Compliance Analysis Tracking v10.11**

**MICRC Meeting - East Lansing, MI - Oct. 8, 2021**
Meeting Notice - **Oct. 8, 2021**

Def. App. 126a

Meeting Agenda - **Oct. 8, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 8, 2021**
Written Public Comment -
> **Oct. 8, 2021 part 1**
> **Oct. 8, 2021 part 2**
> **Oct 8, 2021 part 3**
Transcript - **Oct. 8, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Clark**

**MICRC Meeting - East Lansing, MI - Oct. 7, 2021**
Meeting Notice - **Oct. 7, 2021**
Meeting Agenda - **Oct. 7, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 7, 2021**
Written Public Comment - **Oct. 7, 2021**
Transcript - **Oct. 7, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Szetela**
> **Remote Attendance Notice - Clark**
> **Resolutions Oct. 7, 2021**

**MICRC Meeting - East Lansing, MI - Oct. 6, 2021**
Meeting Notice - **Oct. 6, 2021**
Meeting Agenda - **Oct. 6, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 6, 2021**
Written Public Comment -
Transcript - **Oct. 6, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**

**Def. App. 127a**

> Remote Attendance Notice - Curry
> Remote Attendance Notice - Kellom
> Remote Attendance Notice - Clark
> Remote Attendance Notice - Szetela

**MICRC Meeting - East Lansing, MI - Oct. 5, 2021**
Meeting Notice - **Oct. 5, 2021**
Meeting Agenda - **Oct. 5, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 5, 2021**
Written Public Comment - **Oct. 5, 2021**
Transcript - **Oct. 5, 2021**
Draft Maps -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Kellom
> Remote Attendance Notice - Eid
> Partisan fairness possible unacceptable scores

**MICRC Meeting - East Lansing, MI - Oct. 4, 2021**
Meeting Notice -  **Oct. 4, 2021**
Meeting Agenda - **Oct. 4, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 4, 2021**
Written Public Comment -
Transcript - **Oct. 4, 2021**
Draft Maps -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Kellom

**MICRC Meeting - Troy, MI - Oct. 1, 2021**
Meeting Notice - **Oct. 1, 2021**
Meeting Agenda - **Oct. 1, 2021**
Approved Minutes -
Proposed Minutes - **Oct. 1, 2021**
Written Public Comment -
Transcript - **Oct. 1, 2021**
Draft Maps -
Other Meeting Materials -

**Def. App. 128a**

> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Kellom
> Memo Proposed Amendments to MICRC Rules of Procedure Sept. 30
> Proposed Amendments to MICRC Rules of Procedure Sept. 30
> Measuring Partisan Fairness
> Handley memo on three partisan fairness
> 9-30-21 RAS revisions CD
> 9-29-21 Eid v2a CD 188
> MI CD 9-21 21v1 187
> MI Senate 9-15-21 v16A
> Partisan Fairness Copy of 9-15-21 v16A

**MICRC Meeting - Rochester, MI - Sept. 30, 2021 (5 p.m. to 8 p.m.)**
Meeting Notice - **Sept. 30, 2021**
Meeting Agenda - **Sept. 30, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 30 2021**
Written Public Comment -
Transcript - **Sept. 30, 2021**
Draft Maps -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Kellom

**MICRC Meeting - Rochester, MI - Sept. 30, 2021 (10 a.m. to 4 p.m.)**
Meeting Notice - **Sept. 30, 3021**
Meeting Agenda - **Sept. 30, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 30, 2021**
Written Public Comment -
Transcript - **Sept. 30, 2021**
Draft Maps -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Kellom
> **Gud Marketing Proposal Sept. 30**
> **Resolution 2021-09-07 Approve Amended Rules of Procedure**
> **Resolution 2021-09-08 Promotional Consultant Contract**

Def. App. 129a

**MICRC Meeting - Detroit, MI - Sept. 29, 2021**
Meeting Notice - **Sept. 29, 2021, Sept. 29, 2021 - SPANISH**
Meeting Agenda - **Sept. 29, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 29, 2021**
Written Public Comment - **Sept. 29, 2021**
Transcript - **Sept. 29, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**

**MICRC Meeting - Detroit, MI - Sept. 28, 2021**
Meeting Notice - **Sept. 28, 2021**
Meeting Agenda - **Sept. 28, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 28, 2021**
Written Public Comment -
Transcript - **Sept. 28, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Clark**
> **Resolution 2021-09-02 Election of Chair**
> **Resolution 2021-09-03 Election of Vice-Chair**
> **Resolution 2021-09-04 Approve Appendix C for EDS**
> **Resolution 2021-09-05 Approve Direct Mail Campaign Contract**
> **Resolution 2021-09-06 Approval of Contract with Local Counsel**
> **CO Update Sept. 28**

**MICRC Meeting - Detroit, MI - Sept. 27, 2021**
Meeting Notice - **Sept. 27, 2021**
Meeting Agenda - **Sept. 27, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 27, 2021**
Written Public Comment - **Sept. 27, 2021**
Transcript - **Sept. 27, 2021**
Draft Maps -

**Def. App. 130a**

Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Clark**
> **Remote Attendance Notice - Weiss**
> **Budget approved as amended 2021-07-29 updated as of 08-31**
> **Direct Mail Bidders 9-14 part 1**
> **Direct Mail Bidders 9-14 part 2**
> **Memo Proposed Amendments to MICRC Rules of Procedure Sept. 26**
> **Proposed Amendments to MICRC Rules of Procedure Sept. 26**

**MICRC Meeting - Mt. Pleasant, MI - Sept. 24, 2021**
Meeting Notice - **Sept. 24, 2021**
Meeting Agenda -**Sept. 24, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 24, 2021**
Written Public Comment - **Sept. 24, 2021**
Transcript - **Sept. 24, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Szetela**
> **v9.6 Mapping Process and Procedure Approved**

**MICRC Meeting - Mt. Pleasant, MI - Sept. 23, 2021 (5 (p.m. to 8 p.m.)**
Meeting Notice - **Sept. 23, 2021**
Meeting Agenda - **Sept. 23, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 23, 2021**
Written Public Comment -
Transcript - **Sept. 23, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **Remote Attendance Notice - Szetela**

**Def. App. 131a**

RECEIVED by MSC 1/18/2022 10:30:25 PM

**MICRC Meeting - Mt. Pleasant, MI - Sept. 23, 2021 (10 a.m. to 4 p.m.)**

Meeting Notice - **Sept. 23, 2021**

Meeting Agenda - **Sept. 23, 2021**

Approved Minutes -

Proposed Minutes - **Sept. 23, 2021**

Written Public Comment -

Transcript - **Sept. 23, 2021**

Draft Maps -

Other Meeting Materials -

> **Remote Attendance Notice - Lange**

> **Remote Attendance Notice - Wagner**

> **Remote Attendance Notice - Curry**

> **Remote Attendance Notice - Kellom**

> **Remote Attendance Notice - Szetela**

> **DRAFT Appendix C to EDS Contract Sept. 21**

**MICRC Meeting - East Lansing, MI - Sept. 22, 2021**

Meeting Notice - **Sept. 22, 2021**

Meeting Agenda - **Sept. 22, 2021**

Approved Minutes -

Proposed Minutes - **Sept. 22, 2021**

Written Public Comment -

Transcript - **Sept. 22, 2021**

Draft Maps -

Other Meeting Materials -

> **Remote Attendance Notice - Lange**

> **Remote Attendance Notice - Wagner**

> **Remote Attendance Notice - Curry**

> **Remote Attendance Notice - Kellom**

**MICRC Meeting - East Lansing, MI - Sept. 21, 2021 (9 a.m. to 6 p.m.)**

Meeting Notice - **Sept. 21, 2021**

Meeting Agenda - **Sept. 21, 2021**

Approved Minutes -

Proposed Minutes - **Sept. 21, 2021**

Written Public Comment -

Transcript - **Sept. 21, 2021**

Draft Maps -

Other Meeting Materials -

> **Remote Attendance Notice - Lange**

> **Remote Attendance Notice - Wagner**

> **Remote Attendance Notice - Curry**

> **Remote Attendance Notice - Szetela**

> **Remote Attendance Notice - Kellom**

**Def. App. 132a**

**MICRC Committee Meeting - East Lansing, MI - Sept. 21, 2021 (8 a.m. to 9 a.m.)**

Meeting Notice - **Sept. 21, 2021**

Meeting Agenda - **Sept. 21, 2021**

Approved Minutes -

Proposed Minutes - **Sept. 21, 2021**

Written Public Comment -

Transcript -

Draft Maps -

Other Meeting Materials -

> **Remote Attendance Notice - Lange**

> **Remote Attendance Notice - Wagner**

> **Remote Attendance Notice - Curry**

> **Remote Attendance Notice - Szetela**

> **Remote Attendance Notice - Kellom**

> **Honigman Response RFP Sept. 20**

> **Lancaster Cover Letter Response Local Counsel RFP Sept. 8**

> **Lancaster RFP Response Sept. 8**

> **Lancaster Docs Previously Submitted for GC**

> **Lancaster Political Contributions 2010 to Present**

> **Lancaster Writing Sample July 26, 20211**

> **Local Counsel RFP Fink Bressack**

**MICRC Meeting - East Lansing, MI - Sept. 20, 2021**

Meeting Notice - **Sept. 20, 2021**

Meeting Agenda - **Sept. 20, 2021**

Approved Minutes -

Proposed Minutes - **Sept. 20, 2021**

Written Public Comment -

Transcript - **Sept. 20, 2021**

Draft Maps -

Other Meeting Materials -

> **Remote Attendance Notice - Lange**

> **Remote Attendance Notice - Kellom**

> **Map Presentation - Sept. 20**

**MICRC Meeting - Allendale, MI - Sept. 16, 2021 (5 p.m. to 8 p.m.)**

Meeting Notice - **Sept. 16, 2021**

Meeting Agenda - **Sept. 16, 2021**

Approved Minutes -

Proposed Minutes - **Sept. 16, 2021**

Written Public Comment -

Transcript -

Draft Maps -

Other Meeting Materials -

> **Remote Attendance Notice - Lange**

Def. App. 133a

> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Szetela
> Remote Attendance Notice - Kellom
> Remote Attendance Notice - Clark

**MICRC Meeting - Allendale, MI - Sept. 16, 2021 (1 p.m. to 4 p.m.)**
Meeting Notice - **Sept. 16, 2021**
Meeting Agenda - **Sept. 16, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 16, 2021**
Written Public Comment -
Transcript - **Sept. 16, 2021**
Draft Maps -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Szetela
> Remote Attendance Notice - Kellom
> Remote Attendance Notice - Clark

**MICRC Meeting - East Lansing, MI - Sept. 15, 2021**
Meeting Notice - **Sept. 15, 2021**
Meeting Agenda - **Sept. 15, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 15, 2021**
Written Public Comment -
Transcript - **Sept. 15, 2021**
Draft Maps -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Szetela
> Remote Attendance Notice - Lett
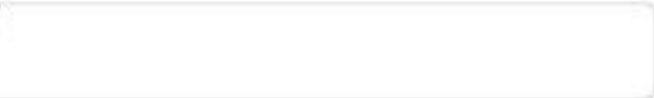
**MICRC Meeting - East Lansing, MI - Sept. 14, 2021**
Meeting Notice - **Sept. 14, 2021**
Meeting Agenda - **Sept. 14, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 14, 2021**
Written Public Comment -
> **Sept. 14, 2021 - Part 1**
> **Sept. 14, 2021 - Part 2**

Def. App. 134a

> Sept. 14, 2021 - Part 3
> Sept. 14, 2021 - Part 4
Transcript - Sept. 14, 2021
Draft Maps -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Szetela
> Correspondence from Dr. Petering

**MICRC Meeting - East Lansing, MI - Sept. 13, 2021**
Meeting Notice - Sept. 13, 2021
Meeting Agenda - Sept. 13, 2021
Approved Minutes -
Proposed Minutes - Sept. 13, 2021
Written Public Comment - Sept. 13, 2021
Transcript - Sept. 13, 2021
Draft Maps -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry
> Remote Attendance Notice - Szetela

**MICRC Meeting - Big Rapids, MI - Sept. 9, 2021 (5 p.m. to 8 p.m.)**
Meeting Notice - Sept. 9, 2021
Meeting Agenda - Sept. 9, 2021
Approved Minutes -
Proposed Minutes - Sept. 9, 2021
Written Public Comment -
Transcript - Sept. 9, 2021
Draft Maps -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Remote Attendance Notice - Curry

**MICRC Meeting - Big Rapids, MI - Sept. 9, 2021 (12 p.m. to 4 p.m.)**
Meeting Notice - Sept. 9, 2021
Meeting Agenda - Sept. 9, 2021
Approved Minutes -
Proposed Minutes - Sept. 9, 2021
Written Public Comment - Sept. 9, 2021

Def. App. 135a

Transcript - **Sept. 9, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**

**MICRC Meeting - East Lansing, MI - Sept. 8, 2021**
Meeting Notice - **Sept. 8, 2021**
Meeting Agenda - **Sept. 8, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 8, 2021**
Written Public Comment -
Transcript - **Sept. 8, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Vallette**
> **Remote Attendance Notice - Curry**

**MICRC Meeting - East Lansing, MI - Sept. 7, 2021**
Meeting Notice - **Sept. 7, 2021**
Meeting Agenda - **Sept. 7, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 7, 2021**
Written Public Comment -
Transcript - **Sept. 7, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Curry**
> **Remote Attendance Notice - Kellom**
> **COI Cluster Index**
> **In Person Comments Geographical Considerations**
> **Written Public Comment - Aug. 17, 2021**
> **Mapping Process and Procedure Version 9.6**
> **PR Contractor Bid - SE MI**
> **PR Contractor Bid - MI**
> **Direct Mail campaign - Statement of Work**

**MICRC Meeting - Ann Arbor, MI - Sept. 2, 2021 (5 p.m. to 8 p.m.)**
Meeting Notice - **Sept. 2, 2021**

Def. App. 136a

Meeting Agenda - **Sept. 2, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 2, 2021**
Written Public Comment -
Transcript - **Sept. 2, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Clark**

**MICRC Meeting - Ann Arbor, MI - Sept. 2, 2021 (1 p.m. to 4 p.m.)**
Meeting Notice - **Sept. 2, 2021**
Meeting Agenda - **Sept. 2, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 2, 2021**
Written Public Comment - **Sept. 2, 2021**
Transcript - **Sept. 2, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Clark**
> **Handley presentation - Sept. 2**

**MICRC Meeting - Detroit, MI - Sept. 1, 2021**
Meeting Notice - **Sept. 1, 2021**
Meeting Agenda - **Sept. 1, 2021**
Approved Minutes -
Proposed Minutes - **Sept. 1, 2021**
Written Public Comment - **Sept. 1, 2021**
Transcript - **Sept. 1, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Draft COI Process and Considerations v8.31**
> **Report from Moon Michigan COI Aug. 26**
> **COI Clusters for Michigan**
> **Executed Resolution Aug. 30**
> **Meeting Materials Sept. 1**

**MICRC Meeting - Detroit, MI - Aug. 31, 2021**
Meeting Notice - **Aug. 31, 2021**

Def. App. 137a

Meeting Agenda - **Aug. 31, 2021**
Approved Minutes -
Proposed Minutes - **Aug. 31, 2021**
Written Public Comment -
Transcript - **Aug. 31, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**

**MICRC Meeting - Detroit, MI - Aug. 30, 2021**
Meeting Notice - **Aug. 30, 2021**
Meeting Agenda - **Aug. 30, 2021**
Approved Minutes -
Proposed Minutes - **Aug. 30, 2021**
Written Public Comment - **Aug. 30, 2021**
Transcript - **Aug. 30, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Szetela**
> **Remote Attendance Notice - Weiss**
> **2nd Round of Public Hearings**
> **2nd Round of Public Hearings Dates and Locations**
> **Copy of Written Public Comments Aug. 17**
> **In Person Comments**
> **Plans from PC Portal as of Aug. 8**
> **Report from Moon MI COI Aug. 26**

**MICRC Meeting - Acme, MI - Aug. 26, 2021 (5 p.m. to 8 p.m.)**
Meeting Notice - **Aug. 26, 2021**
Meeting Agenda - **Aug. 26, 2021**
Approved Minutes -
Proposed Minutes - **Aug. 26, 2021**
Written Public Comment - **Aug. 26, 2021**
Transcript - **Aug. 26, 2021**
Draft Maps -
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**

**MICRC Meeting - Acme, MI - Aug. 26, 2021 (1 p.m. to 4 p.m.)**
Meeting Notice - **Aug. 26, 2021**

<div align="center">Def. App. 138a</div>

Meeting Agenda - **Aug. 26, 2021**
Approved Minutes -
Proposed Minutes - **Aug. 26, 2021**
Written Public Comment - **Aug. 26, 2021**
Transcript - **Aug. 26, 2021**
Draft Maps -
> **Witjes alternative draft map** ZIP
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Resolution Establish Total Cost of Litigation Counsel and Modify Contract Terms - Aug. 20**
> **Michigan COI - Aug. 26, 2021**
> **COI Shape File**

**MICRC Meeting - East Lansing, MI - Aug. 24, 2021**
Meeting Notice -**Aug. 24, 2021**
Meeting Agenda - **Aug. 24, 2021**
Approved Minutes -
Proposed Minutes - **Aug. 24, 2021**
Written Public Comment -
Transcript - **Aug. 24, 2021**
Draft Maps -
> **South Central Afternoon Draw Aug. 24** ZIP
> **House South East Morning Draw - Aug. 24** JPG
> **House South East Morning Draw - Aug. 24** PDF
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Formal Invitation to Bid List Draft Aug. 23**
> **Resolution Establish Total Cost of Local Counsel RFP and Extend Formal Invitation to Bid - Aug. 18, 2021**

**MICRC Meeting - East Lansing, MI - Aug. 23, 2021**                    ✖

Meeting Notice - **Aug. 23, 2021**
Meeting Agenda - **Aug. 23, 2021**
Approved Minutes -
Proposed Minutes - **Aug. 23, 2021**
Written Public Comment - **Aug. 23, 2021**
Transcript - **Aug. 23, 2021**
Draft Maps -
> **Collaborative Draft State House Map**
> **Collaborative Draft State Senate Map**
> **Eid Alternative Draft Map**

Def. App. 139a

Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Mapping Process Approved Aug. 19, 2021**
> **Proposed Edits to Mapping Process and Procedures Aug. 22, 2021**
> **Resolution Approve Revised Mapping Process and Procedures Aug. 16, 2021**
> **Resolution Approve Direct Purchase of Direct Mail List for Rural and Downriver Aug. 17, 2021**
> **V8.22 Mapping Process and Procedures**

**MICRC Meeting - East Lansing, MI - Aug. 20, 2021**
Meeting Notice - **Aug. 20, 2021**
Meeting Agenda - **Aug. 20, 2021**
Approved Minutes -
Proposed Minutes - **Aug. 20, 2021**
Written Public Comment - **Aug. 20, 2021**
Transcript - **Aug. 20, 2021**
Draft maps -
> **Comm First Plan SE Mich - Aug. 20, 2021** DBF
> **Comm Plan SE region - Aug. 20, 2021** PDF
> **Comm Plan SE region - Aug. 20, 2021** EXEL
> **Comm Plan SE region Aug. 20, 2021** JPG
> **Comm Plan SE region - Aug. 20, 2021** ZIP
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Written and emailed Public Comments re Geographical Areas thru July 29, 2021**

**MICRC Meeting - East Lansing, MI - Aug. 19, 2021**
Meeting Notice - **Aug. 19, 2021**
Meeting Agenda - **Aug. 19, 2021**
Approved Minutes -
Proposed Minutes - **Aug. 19, 2021**
Written Public Comment - **Aug. 19, 2021**
Transcript - **Aug. 19, 2021**
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Draft Mapping Process and Procedure Final (v8.17)**
> **Resolution 2021.08.06 Approve Mapping Process and Procedures**
> **Draft Procurement Review Policy Revisions Aug. 14**
> **Resolution 2021.08.09 Approve Amended Procurement Guidelines**
> **Resolution 2021.08.10 Approve Issuance of Local Counsel RFP**
> **Draft Contract Robert Half Legal Aug. 18**

**Def. App. 140a**

> Resolution 2021.08.11 Approve Contract with RHG for Paralegal Services
> Resolution 2021.08.12 Approve bids for Direct Mail Campaign
> Resolution 2021.08.13 Promotional Consultant Service
> Resolution 2021.08.14 Media Buys 2nd Round of Public Hearings
> Resolution 2021.08.15 Approve Purchase of Translation Services
> MI 2020 St Senate Dist Table
> MI 2020 St House Districts Tables
> MI 2020 County Data Tables
> EDS Census Data Analysis and Compilation
> Written and Emailed Public Comments re. Geographical Areas Aug. 17

**MICRC Meeting - Detroit, MI - Aug. 13, 2021 (Canceled)**
Cancelation Meeting Notice - Aug. 13, 2021

**MICRC Meeting - Detroit, MI - Aug. 12, 2021**
Meeting Notice - Aug. 12, 2021
Meeting Agenda - Aug. 12, 2021
Approved Minutes -
Proposed Minutes - Aug. 12, 2021
Written Public Comment - Aug. 12, 2021
Transcript - Aug. 12, 2021
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Executed Resolutions
> Draft Mapping Schedule v8.11.3
> Resolution Approve Revised Meeting Schedule - Aug. 3, 2021
> Resolution Approve Additional Billboard Ads - Aug. 7, 2021
> Resolution Approve Direct Mail Campaign - Aug. 8, 2021
> Resolution Approve Draft of Procedures for Mapping Meetings - Aug. 6, 2021
> Resolution Approve Draft of COI and Public Comment Process Considerations - Aug. 4, 2021
> Resolution Approve Draft of Mapping Software Guidelines Re a Quorum - Aug. 5, 2021
> Mapping Compendium Part 1
> Mapping Compendium Part 2

**MICRC Meeting - Detroit, MI - Aug. 6, 2021**
Meeting Notice - Aug. 6, 2021
Meeting Agenda - Aug. 6, 2021
Approved Minutes -
Proposed Minutes -  Aug. 6, 2021
Written Public Comment -
Transcript - Aug. 6, 2021
Other Meeting Materials -
> Remote Attendance Notice - Lange

Def. App. 141a

> Remote Attendance Notice - Wagner
> Measuring Partisan Fairness by Dr. Lisa Handley
> Dr. L. Handley Memo on Three Partisan Fairness Measures
> COI Aggregation

**MICRC Meeting - Detroit, MI - Aug. 5, 2021**
Meeting Notice - **Aug. 5, 2021**
Meeting Agenda - **Aug. 5, 2021**
Approved Minutes -
Proposed Minutes - **Aug. 5, 2021**
Written Public Comment - **Aug. 5, 2021**
Transcript -
Other Meeting Materials -
> Remote Attendance Notice - Lange
> Remote Attendance Notice - Wagner
> Notice and Report of an Informal Contract
> Encore Quote 2669 1020 July 29 and 30, 2021
> Risk Acceptance Request to Obtain Quickbooks
> Considerations for the Calendar Beginning Aug. 24
> MICRC Resolution Aug. 1, 2021 Revise Commission Meeting Schedule
> Correspondence from James Whitehorne re Census
> MI Redistricting Regions JPG
> Public Comment Aug. 5, 2021

**MICRC Committee Meeting - Detroit, MI - Aug. 5, 2021**
Committee Notice - **Aug. 5, 2021**
Committee Agenda - **Aug. 5, 2021**
Approved Minutes -
Proposed Minutes - **Aug. 5, 2021**
Written Public Comment -
Transcript -
Other Committee Meeting Materials -
> Litigation Counsel RFP Scoring Sheet
> Proposal by BakerHostetler LLP July 2021
> RFP 920 210000002217 Litigation Counsel
> RFP Appendix A 920 210000002217

**MICRC Meeting - Detroit, MI - July 30, 2021**
Meeting Notice - July 30, 2021
Meeting Agenda - July 30, 2021
Approved Minutes - July 30, 2021
Proposed Minutes - July 30, 2021
Written Public Comment -
Transcript - **July 30, 2021**

Def. App. 142a

Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Correspondence from Dr. Petering**
> **MI Redistricting Regions**

**MICRC Meeting - Detroit, MI - July 29, 2021**
Meeting Notice - July 29, 2021
Meeting Agenda - July 29, 2021
Approved Minutes - July 29, 2021
Proposed Minutes - July 29, 2021
Written Public Comment - July 29, 2021
Transcript - July 29, 2021
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Resolution 7/5/2021 Amendment to Hammersmith Contract**
> **Resolution 7/6/2021 Amendment to Pastula Contract**
> **Resolution 7/7/2021 Amendment to Woods III Contract**
> **Budget 7/15/2021**
> **Resolution 2021/07/08 Approve Revisions to Budget**
> **Resolution 7/9/2021 AV Contracts for Meetings**
> **Resolution 7/10/2021 MAB TV Advertising Buys**
> **Draft Amendment to Employment Contracts**
> **Community Outreach PowerPoint**

**MICRC Meeting - Lansing, MI - July 23, 2021**
Meeting Notice - July 23, 2021
Meeting Agenda - July 23, 2021
Approved Minutes - July 23, 2021
Proposed Minutes - July 23, 2021
Written Public Comment -
Transcript - July 23,2021
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**
> **Remote Attendance Notice - Clark**
> **Draft MICRC Calendar updated - July 15, 2021**
> **MICRC Adopted Schedule v7-15**
> **Notice of Emergency Procurement - July 22 & 23, 2021**
> **Resolution Approve Emergency AV Procurement July 4, 2021**

**MICRC Meeting - Lansing, MI - July 22, 2021**
Meeting Notice - July 22, 2021

**Def. App. 143a**

Meeting Agenda - **July 22, 2021**
Approved Minutes - **July 22, 2021**
Proposed Minutes - **July 22, 2021**
Written Public Comment - July 22, 2021
Transcript - **July 22, 2021**
Other Meeting Materials -
> **Remote Attendance Notice - Lange**
> **Remote Attendance Notice - Wagner**

**MICRC Meeting - Benton Harbor, MI - July 15, 2021**
Meeting Notice - **July 15, 2021**
Meeting Agenda - **July 15, 2021**
Approved Minutes - **July 15, 2021**
Proposed Minutes - **July 15, 2021**
Written Public Comment - **July 15, 2021**
Transcript -
Other Meeting Materials -
> **Notice of Remote Attendance - Lange**
> **Notice of Remote Attendance Kellom**
> **Notice of Remote Attendance - Clark**
> **Draft Calendar of Activities - July 14, 2021**
> **Schedule July 15 through September 30 adopted - July 9, 2021**
> **Resolution July 01, 2021 Approve Revised Commission Meeting Schedule**
> **Memo on Assuring Quorums and Notification of Absences**
> **Financial Procedures DRAFT - July 5, 2021**
> **Resolution July 2, 2021 Approve Financial Procedures**
> **Taylor'd Planning Contract Summary**
> **Notice of Emergency Procurement**
> **Resolution July 3, 2021 - Approve Emergency AV Procurement**
> **Adopted Schedule - V-7-15**

**July 9, 2021 - Michigan Supreme Court Order on Petition for Relief**
Order ⌕162891                                                              ✖

**MICRC Meeting - July 9, 2021**
Meeting Notice - July 9, 2021
Meeting Agenda - **July 9, 2021**
Approved Minutes - **July 9, 2021**
Proposed Minutes - **July 9, 2021**
Written Public Comment - **July 9, 2021**
Transcript - **July 9, 2021**
Other Meeting Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

**Def. App. 144a**

> Notice of Remote Attendance - **Szetela**
> **Draft email to written public comment submissions**
> **Adelson DOJ Constitution July 9**
> **Draft Proposed Schedule - July and Aug.**
> **Amended RFP Litigation Counsel - Adopted**
> **Measuring Partisan Fairness by Dr. Lisa Handley**

**MICRC Meeting - July 8, 2021**
Meeting Notice - **July 8, 2021**
Meeting Agenda - **July 8, 2021**
Approved Minutes - **July 8, 2021**
Proposed Minutes - **July 8, 2021**
Written Public Comment - **July 8, 2021**
Transcript - **July 8, 2021**
Other Meeting Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> Notice of Remote Attendance - Szetela
> **Public feedback overview through July 4**
> **Adelson Implicit Bias July 8**
> **Communities of Interest Process - July 7, 2021**

**MICRC Hearing - Grand Rapids, MI (DeVos Place) - July 1, 2021**
Hearing Notice - **HEARING NOTICE**
Hearing Agenda - **HEARING AGENDA**
Approved Minutes - **July 1, 2021**
Proposed Minutes - **July 1, 2021**
Written Public Comment -
Transcript - **July 1, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

**MICRC Meeting - Grand Rapids (DeVos Place) - July 1, 2021**

Meeting Notice - **MEETING NOTICE**
Meeting Agenda - **MEETING AGENDA**
Approved Minutes - **July 1, 2021**
Proposed Minutes - **July 1, 2021**
Written Public Comment - **July 1, 2021** (also see below in other materials)
Transcript - **July 1, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

Def. App. 145a

> Public Comment Submission - Redistricting possible solution XLSX
> MICRC Draft Timeline and Roadmap
> MICRC Calendar - July 1, 2021

**MICRC Meeting - June 30, 2021**
Meeting Notice - **June 30, 2021**
Meeting Agenda - **June 30, 2021**
Approved Minutes - **June 30, 2021**
Proposed Minutes - **June 30, 2021**
Written Public Comment -
Transcript - **June 30, 2021**
Other Meeting Materials -
> **Thought Starters for Process - June 28, 2021**
> **Redistricting Process v 1.0**

**MICRC Hearing - Muskegon, MI (VanDyk Mortgage Convention Center) - June 29, 2021**
Hearing Notice - **HEARING NOTICE**
Hearing Agenda - **HEARING AGENDA**
Approved Minutes - **June 29, 2021**
Proposed Minutes - **June 29, 2021**
Written Public Comment -
Transcript - **June 29, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

**MICRC Meeting - Muskegon, MI (VanDyk Mortgage Convention Center) - June 29, 2021**
Meeting Notice - **MEETING NOTICE**
Meeting Agenda - **MEETING AGENDA**
Approved Minutes - **June 29, 2021**
Proposed Minutes - **June 29, 2021**
Written Public Comment - **June 29, 2021**
Transcript - **June 29, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> Notice of Remote Attendance - **Szetela**
> **Resolutions - June 29, 2021**
> **Resolution Issue RFP for Litigation Counsel - June 4, 2021**
> **Org Chart - June 28, 2021**
> **Resolution Org Chart - June 5, 2021**
> **Part 4 Training Census Data #1** PPTX
> **Part 4 Training Census Data #2** PPTX
> **Part 4 Training Census Data #3** PPTX
> **Part 4 Training Census Data #4** PPTX

Def. App. 146a

**MICRC Committee Meeting - June 28, 2021**

Committee Meeting Notice - **June 28, 2021**
Committee Meeting Agenda - **June 28, 2021**
Approved Minutes - **June 28, 2021**
Proposed Minutes - **June 28, 2021**
Written Public Comment - **June 28, 2021**
Transcript - **June 28, 2021**
Other Committee Meeting Materials -
> **Thought Starters for Redistricting Process - June 26, 2021**
> **Draft Redistricting Process Flow Chart - June 26, 2021**

**MICRC Committee Meeting - June 25, 2021**
Committee Meeting Notice - **June 25, 2021**
Committee Meeting Agenda -**June 25,2021**
Approved Minutes - **June 25, 2021**
Proposed Minutes - **June 25, 2021**
Written Public Comment -
Transcript - **June 25, 2021**
Other Committee Meeting Materials -
> **Questions from MICRC to Consultants**
> **Thought Starters for Redistricting Process Decisions**
> **Election Data Services Contract**

**MICRC Hearing - Warren, MI (MRCC Banquet Center) - June 24, 2021**
Hearing Notice - **HEARING NOTICE**
Hearing Agenda - **HEARING AGENDA**
Approved Minutes - **June 24, 2021**
Proposed Minutes - **June 24, 2021**
Written Public Comment -
Transcript - **June 24, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> Notice of Remote Attendance - **Orton**

✖

**MICRC Meeting - Warren, MI (MRCC Banquet Center) - June 24, 2021**
Meeting Notice - **MEETING NOTICE**
Meeting Agenda - **MEETING AGENDA**
Approved Minutes - **June 24, 2021**
Proposed Minutes - **June 24, 2021**
Written Public Comment -
Transcript - **June 24, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**

**Def. App. 147a**

> Notice of Remote Attendance - **Wagner**
> Notice of Remote Attendance - **Orton**
> **MI Counties Population Plan Tables revamped** XLS
> **Kim Brace MI Counties Population Plan Tables revamped**
> **Kim Brace Part 2 Redistricting Elements Census Data**
> **Part 3 Redistricting Elements Census Data Race** PPTX
> **Population Estimates 2020** XLSX
> **Morgan RD mapping Part 1**
> **Morgan RD mapping Part 2**
> **Morgan RD mapping Part 3**
> **Morgan RD mapping Part 4**
> **Morgan RD mapping Part 5**
> **MI Counties Pop Plan Tables - June 24** XLS

**MICRC Hearing - Port Huron, MI (Blue Water Convention Center) - June 22, 2021**
Hearing Notice - **HEARING NOTICE**
Hearing Agenda - **HEARING AGENDA**
Approved Minutes - **June 22, 2021**
Proposed Minutes - **June 22, 2021**
Written Public Comment -
Transcript - **June 22, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> Notice of Remote Attendance - **Orton**

**MICRC Meeting - Port Huron, MI (Blue Water Convention Center) - June 22, 2021**
Meeting Notice - **MEETING NOTICE**
Meeting Agenda - **MEETING AGENDA**
Approved Minutes - **June 22, 2021**
Proposed Minutes - **June 22, 2021**
Written Public Comment - **June 22, 2021**
Transcript - **June 22, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> Notice of Remote Attendance - **Orton**
> **Reflections on the Listening Tour 6/22**
> **Fairness and Decision Making**
> **Resolution June 3, 2021 Update Commission Meeting Schedule per June 22 Agenda**

**MICRC Hearing - Detroit, MI (TCF CENTER) - June 17, 2021**
Hearing Notice - **HEARING NOTICE**
Hearing Agenda - **HEARING AGENDA**
Approved Minutes - **June 17, 2021**

Def. App. 148a

Proposed Minutes - **June 17, 2021**
Written Public Comment -
Transcript - **June 17, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> Notice of Remote Attendance - **Szetela**

**MICRC Meeting - Detroit, MI (TCF CENTER) - June 17, 2021**

Meeting Notice - **MEETING NOTICE**
Meeting Agenda - **MEETING AGENDA**
Approved Minutes - **June 17, 2021**
Proposed Minutes - **June 17, 2021**
Written Public Comment -
Transcript - **June 17, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> Notice of Remote Attendance - **Szetela**
> **Reflections on the Listening Tour**
> **Regular Meeting Schedule Updated 6-16-21**
> **Resolution for Revised Commission Meeting Schedule**
> **Kim Brace Part 2 Redistricting Elements Census Data**
> **Kim Brace MI Counties Pop Plan Tables**

**MICRC Meeting - Detroit, MI (The Village Dome at Fellowship Chapel) - June 15, 2021**
Hearing Notice - **HEARING NOTICE**
Hearing Agenda - **HEARING AGENDA**
Approved Minutes - **June 15, 2021**
Proposed Minutes - **June 15, 2021**
Written Public Comment -
Transcript - **June 15, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

**MICRC Meeting - Detroit, MI (The Village Dome at Fellowship Chapel) - June 15, 2021**
Meeting Notice - **MEETING NOTICE**
Meeting Agenda - **MEETING AGENDA**
Approved Minutes - **June 15, 2021**
Proposed Minutes - **June 15, 2021**
Written Public Comment - **June 15, 2021**
Transcript -
Other Hearing Materials -

**Def. App. 149a**

\> Notice of Remote Attendance - **Lange**
\> Notice of Remote Attendance - **Wagner**
\> **Reflections on the Listening Tour**
\> **Budget - May 31, 2021**
\> **Adelson - Redistricting and Race**
\> **Communications and Outreach Update PowerPoint**

**Legal Filing - June 10, 2021**
Responsive brief of Petitioners MICRC/SOS
Responsive brief of Dept. of Attorney General in support
League of Women Voters amicus brief in support
Voters Not Politicians amicus brief in support
Responsive brief of Dept. of Attorney General in opposition
Senate amicus brief in opposition

**MICRC Hearing - Pontiac, MI - June 10, 2021**
Hearing Notice - **HEARING NOTICE**
Hearing Agenda - **HEARING AGENDA**
Approved Minutes - **June 10, 2021**
Proposed Minutes - **June 10, 2021**
Written Public Comment -
Transcript - **June 10, 2021**
Other Hearing Materials -
\> Notice of Remote Attendance - **Lange**
\> Notice of Remote Attendance - **Wagner**

**MICRC Meeting - Pontiac, MI - June 10, 2021**
Meeting Notice - **MEETING NOTICE**
Meeting Agenda - **MEETING AGENDA**
Approved Minutes - **June 10, 2021**
Proposed Minutes - **June 10, 2021**
Written Public Comment -
Transcript - **June 10, 2021**
Other Hearing Materials -
\> Notice of Remote Attendance - **Lange**
\> Notice of Remote Attendance - **Wagner**
\> **2021 Schedule Updated**
\> **Next Steps and Future Agenda Items**

**MICRC Hearing - Novi, MI - June 8, 2021**
Hearing Notice - **HEARING NOTICE**
Agenda -
Approved Minutes - **June 8, 2021**
Proposed Minutes - **June 8, 2021**
Written Public Comment - **June 8, 2021**

Def. App. 150a

Transcript - **June 8, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

**MICRC Hearing - Dearborn, MI - June 3, 2021**
Hearing Notice - **HEARING NOTICE**
Agenda - **HEARING AGENDA**
Approved Minutes - **June 3, 2021**
Proposed Minutes - **June 3, 2021**
Written Public Comment -
Transcript - **June 3, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

**MICRC Meeting - Dearborn, MI - June 3, 2021**
Meeting Notice - **MEETING NOTICE**
Agenda - **MEETING AGENDA**
Approved Minutes - **June 3, 2021**
Proposed Minutes - **June 3, 2021**
Written Public Comment - **June 3, 2021**
Transcript - **June 3, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> **Resolution - Change Commission Meetings - 5/14/2021**
> **MEMO for options 6/2/2021**
> **Executed Resolutions - 6/3/2021**

**MICRC Hearing - Flint, MI - June 1, 2021**
Hearing Notice - **HEARING NOTICE**
Agenda - **HEARING AGENDA**
Approved Minutes - **June 1, 2021**
Proposed Minutes - **June 1, 2021**
Written Public Comment - **June 1, 2021**
Transcript - **June 1, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> **Legal Staffing Agency Updated Dates and Posted June 1**

**MICRC Hearing - Lansing, MI - May 27, 2021**
Hearing Notice - **HEARING NOTICE**
Agenda - **HEARING AGENDA**

Def. App. 151a

Approved Minutes - **May 27, 2021**
Proposed Minutes - **May 27, 2021**
Written Public Comment -
Transcript - **May 27, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

**MICRC Meeting - Lansing, MI - May 27, 2021**
Meeting Notice - **MEETING NOTICE**
Agenda - **MEETING AGENDA**
Approved Minutes - **May 27, 2021**
Proposed Minutes -  **May 27, 2021**
Written Public Comment - **May 27, 2021**
Transcript - **May 27, 2021**
Other Meeting Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> **Executed Resolutions**
> **Resolution - Waive potential conflicts of interest - May 13, 2021**
> **Resolution - Hire Executive Assistant**
> **MICRC Election Data Services Contract**

**MICRC Hearing - Midland, MI - May 25, 2021**
Hearing Notice - **HEARING NOTICE**
Agenda - **HEARING AGENDA**
Approved Minutes - **May 25, 2021**
Proposed Minutes - **May 25, 2021**
Written Public Comment -
Transcript - **May 25, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

**MICRC Hearing - Gaylord, MI - May 20, 2021**
Meeting Notice - **HEARING NOTICE**
Agenda - **HEARING AGENDA**
Approved Minutes - **May 20, 2021**
Proposed Minutes - **May 20, 2021**
Written Public Comment -
Transcript - **May 20, 2021**
Other Hearing Materials -
> Notice of Remote Attendance - **Szetela**

**Def. App. 152a**

> Notice of Remote Attendance - **Clark**
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

**MICRC Meeting - May 20, 2021**
Meeting Notice - **MEETING NOTICE**
Agenda - **MEETING AGENDA**
Approved Minutes - **May 20, 2021**
Proposed Minutes - **May 20, 2021**
Written Public Comment -
Transcript - **May 20, 2021**
Other Meeting Materials
> Notice of Remote Attendance - **Szetela**
> Notice of Remote Attendance - **Clark**
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> **Proposed Minutes - May 6, 2021**
> **Proposed Minutes - May 11, 2021**
> **Travel Regulations**

**MICRC Hearing - Marquette, MI - May 18, 2021**
Meeting Notice - **May 18, 2021**
Agenda - **May 18, 2021**
Approved Minutes - **May 18, 2021**
Proposed Minutes - **May 18, 2021**
Written Public Comment -
Transcript - **May 18, 2021**
Other Hearing Materials
> Notice of Remote Attendance - **Clark**
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**

**MICRC Hearing - Kalamazoo, MI - May 13, 2021**
Meeting Notice - **May 13, 2021**
Agenda - **May 13, 2021**
Approved Minutes - **May 13, 2021**
Proposed Minutes - **May 13, 2021**
Written Public Comment - **May 13, 2021**
Transcript - **May 13, 2021**
Other Meeting Materials
> Notice of Remote Attendance - **Lange**
> Notice of Remote Attendance - **Wagner**
> **MICRC Federal Compliance VRA Legal Counsel Contract**

**Def. App. 153a**

**MICRC Meeting - May 13, 2021 - Cancelled**

Meeting Cancellation - **May 13, 2021**

**MICRC Hearing - Jackson, MI - May 11, 2021**

Meeting Notice - **May 11, 2021**

Agenda - **May 11, 2021**

Approved Minutes - **May 11, 2021**

Proposed Minutes - **May 11, 2021**

Written Public Comment - **May 11, 2021**

Transcript - **May 11, 2021**

Other Meeting Materials

> Notice of Remote Attendance - **Lange**

> Notice of Remote Attendance - **Wagner**

**MICRC Meeting - May 6, 2021**

Meeting Notice - **May 6, 2021**

Agenda - **May 6, 2021**

Approved Minutes - **May 6, 2021**

Proposed Minutes - **May 6, 2021**

Written Public Comment - **May 6, 2021**

Transcript - **May 6, 2021**

Other Meeting Materials -

> **Resolution Issue Bid Requests for Legal Staffing May 1, 2021**

> **Procurement Request Legal Staffing May 4 with Updates**

> **Notice of Emergency Procurement**

> **Jackson AV Quote Chase Creative**

> **Resolution Emergency Procurement Jackson AV - May 2, 2021**

> **Resolution Muskegon Public Hearing AV Contract Chase Creative - May 3, 2021**

> **Resolution Public Hearing AV Contracts with Encore - May 4, 2021**

> **Conflict of Interest Policy Draft Submitted May 4, 2021**

> **Resolution Conflict of Interest Policy May 5, 2021**

> **Litigation Counsel SOW Draft Submitted May 4, 2021**

> **Resolution Issue RFP Litigation Counsel - May 6, 2021**

> **Budget updated May 3, 2021**

> **Resolution Approve Revisions to Budget May 7, 2021**

> **Resolution Discharge Consultant Procurement Committees - May 8, 2021**

> **Resolution Cancel May 13 meeting - May 9, 2021**

> **CO Update - May 6, 2021**

> **Conflicts Policy Presentation - May 6, 2021**

> **Litigation RFP Presentation - May 6, 2021**

**MICRC Committee Meeting - Apr. 29, 2021**

Meeting Notice -

Agenda -

Approved Minutes -

Def. App. 154a

Proposed Minutes -
Written Public Comment -
Transcript - **Apr. 29, 2021**
Other Meeting Materials -

**MICRC Meeting - Apr. 29, 2021**
Meeting Notice - **Apr. 29, 2021**
Agenda - **Apr. 29, 2021**
Approved Minutes - **Apr. 29, 2021**
Proposed Minutes - **Apr. 29, 2021**
Written Public Comment - **Apr. 29, 2021**
Transcript - **Apr. 29, 2021**
Other Meeting Materials -
> **Legal Services Staffing**
> **Resolution Billboard Advertising for Public Hearings - Apr. 17, 2021**
> **Travel Regulations**
> **Resolution Issue Bid Request for Legal Staffing Agency Apr. 19, 2021**
> **Resolution Extend Remote Meeting for May 6 - Apr. 18, 2021**
> **Resolution Media Buys for Public Hearings - Apr. 16, 2021**
> **Resolution Offer Contract for Videographer Services - Apr. 15, 2021**
> **Resolution AV Contracts for Public Hearings - Apr. 20, 2021**
> **Public Hearing Logistics**
> **April 29 Apportionment**
> **Communications and Outreach Update and Video Production Services**

**MICRC Meeting - Apr. 22, 2021**
Meeting Notice - **Apr. 22, 2021**
Agenda - **Apr. 22, 2021**
Approved Minutes - **Apr. 22, 2021**
Proposed Minutes - **Apr. 22, 2021**
Written Public Comment - **Apr. 22, 2021**
Transcript - **Apr. 22, 2021**
Other Meeting Materials -
> **Memo - Public Comment Process Apr. 21, 2021**
> **Draft Commissioners Roles in the Public Comment Process**
> **One-Pager Live Public Comment Guidelines**
> **Communities of Interest Process**
> **Videographer Evaluation Form**
> **Cutters Updated Pricing Commercial**
> **Cutters updated pricing Vignette**
> **Cutters Studios**
> **Lambert pricing clarified**
> **Lambert Video Production**
> **Cold Box Bid**

**Def. App. 155a**

> Message Makers Proposal
> Imageworks Proposal
> Good Fruit Proposal
> Good Fruit Process
> Good Fruit Production Plan
> Nicolini Video Production Services Proposal Apr. 21, 2021
> Unodeuce Video Proposal 2021
> Resolution Offer Contract for Videographer Services Apr. 15, 2021
> Video Production Services Bid

**Legal Filing - April. 20, 2021**
> Motion 01 expedite MI Supreme Court
> Brief 01 support petition MI Supreme Court Part 1
> Brief 01 support petition MI Supreme Court Part 2
> Brief 01 exhibits and cover part 1
> Brief 01 exhibits and cover part 2
> Brief 01 exhibits and cover part 3
> Brief 01 exhibits and cover part 4
> Petition for Relief

**MICRC Meeting - Apr. 16, 2021**
Meeting Notice - **Apr. 16, 2021**
Agenda - **Apr. 16, 2021**
Approved Minutes - **Apr. 16, 2021**
Proposed Minutes - **Apr. 16, 2021**
Written Public Comment - **Apr. 16, 2021**
Transcript - **Apr. 16, 2021**
Other Meeting Materials -
> Resolution - Offer Contracts to Promotional Consultants -  Apr. 13, 2021
> Public Hearings and town hall forums
> Draft Regular Commission Meeting Agenda during Public Hearing Weeks
> University Outreach
> M3Group MICRC SEM Quote
> M3Group MICRC SEM Timeline
> RFP response McConnell
> SOW Quote Final Michigan
> SOW Quote Final Michigan Timeline
> Quote Van Dyke Horn MICRC Campaign April 2021 SEM
> Statewide proposal VDH MICRC Proposal April 2021
> PR Presentation

**MICRC Meeting - Apr. 15, 2021**
Meeting Notice - **Apr. 15, 2021**
Agenda - **April 15, 2021**
Approved Minutes - **April 15, 2021**

Def. App. 156a

Proposed Minutes - **Apr. 15, 2021**
Written Public Comment - **Apr. 15, 2021**
Transcript - **Apr. 15, 2021**
Other Meeting Materials -
> **Bids for Video Production Services**
> **Resolution Bids for Video Production Services**
> **Resolution to Reconsider Vote on Resolution Apr. 1, 2021**
> **Resolution Apr. 10, 2021 to Extend VRA Legal Counsel Contract**
> **Legacy Format Data Submission Apr. 14, 2021**
> **Resolution April 11, 2021 Add Language to Request for Relief from MI Supreme Court**
> **Draft Communications and Outreach Plan Apr. 12**
> **Resolution Apr. 4, 2021 Communications and Outreach Plan**
> **Members Responsibility Matrix Apr. 12, 2021**
> **MICRC Market Research**
> **Resolution Apr. 11, 2021 FINAL Add Language to Request for Relief from the MI Supreme Court**

**MICRC Meeting - Apr. 8, 2021**
Meeting Notice - **Apr. 8, 2021**
Agenda - **Apr. 8, 2021**
Approved Minutes - **Apr. 8, 2021**
Proposed Minutes - **Apr. 8, 2021**
Written Public Comment - **Apr. 8, 2021**
Transcript - **Apr. 8, 2021**
Other Meeting Materials -
> **Proposed VRA Counsel Interview Questions**
> **Resolution Approve VRA Legal Counsel Consultant**
> **PR Consultant Bid SE Michigan**
> **PR Consultant Bid except SE Michigan**
> **Resolution Issue Bid Requests for Promotional Consultants**
> **Resolution Revised Public Hearing Dates and Locations**
> **Resolution Contracts with Venues for Public Hearings**
> **Remote and Hybrid Meeting Procedures draft**
> **Resolution Remote and Hybrid Meetings**
> **Resolution Lost Stolen Damaged State Equipment Policy**
> **Lost Stolen Equipment Policy Draft**
> **FY Budget as of 3/31/2021**
> **Michigan Pledge and Land Acknowledgments**
> **Policy for Approval of Expenses - Approved**
> **Commission Members Responsibility Matrix - Mar. 30**
> **Proposed Communications and Outreach Plan**

**MICRC Committee Meeting - Mar. 30, 2021**
Meeting Notice - **Mar. 30, 2021**
Agenda - **Mar. 30, 2021**

Def. App. 157a

Approved Minutes - **Mar. 30, 2021**
Proposed Minutes - **Mar. 30, 2021**
Written Public Comment - **Mar. 30, 2021**
Transcript - **Mar. 30, 2021**
Other Meeting Materials -
> **Bryan Sells VRA RFP Submission**
> **Clark Hill VRA RFP Submission**
> **Crimcard VRA RFP Submission**
> **Federal Compliance VRA RFP Submission**
> **Honigman VRA RFP Submission**
> **Tueth VRA RFP Submission**
> **Voting Rights Act Legal Counsel RFP**
> **Sandler VRA RFP Submission Part 1**
> **Sandler VRA RFP Submission Part 2**
> **Vendor Ranking and Rationale**

**MICRC Meeting - Mar. 30, 2021**
Meeting Notice - Mar. 30, 2021
Agenda - **Mar. 30, 2021**
Approved Minutes - **Mar. 30, 2021**
Proposed Minutes - **Mar. 30, 2021**
Written Public Comment - **Mar. 30, 2021**
Transcript - **Mar, 30, 2021**
Other Meeting Materials -
> **Resolution - Revised Public Hearing Schedule and Locations**
> **Resolution - Invitations for Presentations by VRA Legal Counsel Firms**
> **Resolution - Approve Continued Electronic "Virtual" Meetings**
> **Commission Member Responsibilities**
> **Memo - Extend Virtual Meetings**
> **Public Hearings Itinerary and Schedule**

**MICRC Meeting - Mar. 25, 2021**
Meeting Notice - Mar. 25, 2021
Agenda - Mar. 25, 2021
Approved Minutes - **Mar. 25, 2021**
Proposed Minutes - **Mar. 25, 2021**
Written Public Comment - **Mar. 25, 2021**
Transcript - Mar. 25, 2021
Other Meeting Materials -
> **Memo Proposed Extension Dates final Submitted Mar. 23**
> **Resolution - Date Relief for MI Supreme Court Petition**
> **Acronyms**
> **Orientation Glossary**
> **Executive Assistant Job Posting**
> **Resolution - Strategic Plan**

Def. App. 158a

> Draft Strategic Plan
> Sunshine Resolution
> Communications Policy
> March 25 Resolution Date Relief for MI Supreme Court Petition Page 1

**MICRC Meeting - Mar. 18, 2021**
Meeting Notice - **Mar. 18, 2021**
Agenda - **Mar. 18, 2021**
Approved Minutes - **Mar. 18, 2021**
Proposed Minutes - **Mar. 18, 2021**
Written Public Comment - **Mar. 18, 2021**
Transcript - **Mar. 18, 2021**
Other Meeting Materials -
> **Resolution Finalize EDS Appendix and Contract**
> **Resolution Logo**
> Sunshine Week Resolution Text
> Sunshine Week Resolution

**MICRC Meeting - Mar. 11, 2021**
Meeting Notice - **Mar. 11, 2021**
Agenda - **Mar. 11, 2021**
Approved Minutes - **Mar. 11, 2021**
Proposed Minutes - **Mar. 11, 2021**
Written Public Comment - **Mar. 11, 2021**
Transcript - **Mar. 11, 2021**
Other Meeting Materials -
> **Resolution - Budget - Feb. 13, 2021**
> **Resolution Public Hearing Locations - Feb. 12, 2021**
> **Draft FY Budget as of Mar. 9, 2021**
> **Public Hearing Proposed Locations**
> **Communications and Outreach Planning**

**MICRC Meeting - Mar. 5, 2021**
Meeting Notice - **Mar. 5, 2021**
Agenda - **Mar. 5, 2021**
Approved Minutes - **Mar. 5, 2021**
Proposed Minutes - **Mar. 5, 2021**
Written Public Comment - **Mar. 5, 2021**
Transcript - **Mar. 5, 2021**
Other Meeting Materials -
> **Turning Maps Into Ballots PowerPoint Presentation**
> **Resolution Action Regarding Census Delay**
> **Resolution Marketing Contract**
> **Revised Public Hearings Schedule**

**Def. App. 159a**

> Resolutions Public Hearings Locations
> Vendor Questions and Answers VRA draft Submitted March 3
> Resolution Approving the Line Drawing Firm

**MICRC Meeting - Mar. 4, 2021**
Meeting Notice - **Mar. 4, 2021**
Agenda - **Mar. 4, 2021**
Approved Minutes - **Mar. 4, 2021**
Proposed Minutes - **Mar. 4, 2021**
Written Public Comment - **Mar. 4, 2021**
Transcript - **Mar. 4, 2021**
Other Meeting Materials -
> **MICRC Resolution Approving the Line Drawing Firm**
> **Revised Proposed Timeline for Engaging VRA Consultant**

**MICRC Meeting - Feb. 25, 2021**
Meeting Notice - **Feb. 25, 2021**
Agenda - **Feb. 25, 2021**
Approved Minutes - **Feb. 25, 2021**
Proposed Minutes - **Feb. 25,2021**
Written Public Comment - **Feb. 25, 2021**
Transcript - **Feb. 25, 2021**
Other Meeting Materials -
> **DRAFT Revised VRA RFP - Feb. 24, 2021**
> **Proposed Feb. 23, 2021 MICRC Minutes Line Drawing and Redistricting Technical Services Committee**
> **Resolution Feb. 7, 2021 Invitation for Presentations by Mapping Firms to the MICRC**
> **VRA  Legal Counsel RFP Personnel Appendix**

**MICRC Committee Meeting - Feb. 23, 2021**
Meeting Notice - **Feb. 23, 2021**
Agenda - **Feb. 23, 2021**
Approved Minutes - **Feb. 23, 2021**
Proposed Minutes - **Feb. 23, 2021**
Written Public Comment - **Feb. 23, 2021**
Transcript - **Feb. 23, 2021**
Other Meeting Materials -
> **Election Data Services**
> **Redistricting Partners**
> **RelA2ve**
> **Haystaq**
> **Proposed Line Drawing and Redistricting Technical Services Committee**

**Def. App. 160a**

**MICRC Meeting - Feb. 18, 2021**
Meeting Notice - **Feb. 18, 2021**
Agenda - **Feb. 18, 2021**
Approved Minutes - **Feb. 18, 2021**
Proposed Minutes - **Feb. 18, 2021**
Written Public Comment - **Feb. 18, 2021**
Transcript - **Feb. 18, 2021**
Other Meeting Materials -
> **FOIA Policy Draft 2**
> **FOIA Form - Draft 2**
> **Resolution FOIA Procedures and Guidelines**
> **Communication Policy - Draft 2**
> **Resolution - Communication Policy**
> **Procurement Review Procedures and Guidelines Draft 2**
> **Resolution 2 - Procurement Procedures and Guidelines**
> **Marketing and Advertising Statement of Work**
> **Memo - Princeton Draft Budget**
> **Public Hearings PPT**

**MICRC Meeting - Feb. 11, 2021**
Meeting Notice - **Feb. 11, 2021**
Agenda - **Feb. 11, 2021**
Approved Minutes - **Feb. 11, 2021**
Proposed Minutes - **Feb. 11, 2021**
Written Public Comment - **Feb. 11, 2021**
Transcript - **Feb. 11, 2021**
Other Meeting Materials -
> **2021 Key Dates**
> **Communications Policy Draft**
> **FOIA Policy Draft**
> **Memo OMA Guidance for Attending Meetings and Conferences**
> **Resolution - Discharge Personnel Search Committees**
> **Resolution to Approve Communication Policy**
> **Resolution to Approve FOIA Procedures and Guidelines**
> **RFP Review Policy Draft 1 - Feb. 10, 2021**
> **FOIA Presentation**
> **Presentation on Communications Policy and Goals**
> **Presentation on Selecting Consultants**

**MICRC Meeting - Feb. 4, 2021**
Meeting Notice - **Feb. 4, 2021**
Agenda - **Feb. 4, 2021**
Approved Minutes - **Feb. 4, 2021**
Proposed Minutes - **Feb. 4, 2021**
Written Public Comment - **Feb. 4, 2021**

Def. App. 161a

Transcript - **Feb. 4, 2021**
Other Meeting Materials -
> **Rules of Procedure - Feb. 2, 2021**
> **Proposal - Rules of Procedure - Feb. 1, 2021**
> **Adopted - Rules of Procedure - Feb. 4, 2021**
> **Proposed Timelines for Engaging Consultants**

**MICRC Meeting - Jan. 30, 2021**
Meeting Notice - **Jan. 30, 2021**
Agenda - **Jan. 30, 2021**
Approved Minutes - **Jan. 30, 2021**
Proposed Minutes - **Jan. 30, 2021**
Written Public Comment - **Jan. 30, 2021**
Transcript - **Jan. 30, 2021**
Other Meeting Materials -
> **Mapping RFP Vendor Questions**
> **Resolution - Rules of Procedure - Jan. 08, 2021**
> **Updated Commissioner Responsibility Chart - Jan. 28, 2021**
> **Resolution ICRC RFP for VRA Legal Counsel - Jan. 07, 2021**

**MICRC Meeting - Jan. 28, 2021**
Meeting Notice - **Jan. 28, 2021**
Agenda - **Jan. 28, 2021**
Approved Minutes - **Jan. 28, 2021**
Proposed Minutes - **Jan. 28, 2021**
Written Public Comment - **Jan. 28, 2021**
Transcript - **Jan. 28, 2021**
Other Meeting Materials -
> **Proposed 2021 Meeting Schedule**
> **Proposed 2021 Key Dates**
> **Draft Rules of Procedure**
> **Budget FY 2021 as of Jan. 26, 2021**
> **Links to VRA Refresher and Continued Education**
> **Members Responsibilities as of Jan. 21, 2021**

**MICRC Meeting - Jan. 21, 2021**
Meeting Notice - **Jan. 21, 2021**
Agenda - **Jan. 21, 2021**
Approved Minutes - **Jan. 21, 2021**
Proposed Minutes - **Jan. 21, 2021**
Written Public Comment - **Jan. 21, 2021**
Transcript - **Jan. 21, 2021**
Other Meeting Materials -
> **Resolution - Hiring of Communications and Outreach Director**

Def. App. 162a

> Resolution - Approval of RFP for line drawing
> Continuing Education
> Rob Suber PowerPoint on Redistricting Tools & RFP

**MICRC Meeting** - **Jan. 14, 2021**
Meeting Notice - **Jan. 14, 2021**
Agenda - **Jan. 14, 2021**
Approved Minutes - **Jan. 14, 2021**
Proposed Minutes - **Jan. 14, 2021**
Written Public Comment - **Jan. 14, 2021**
Transcript - **Jan. 14, 2021**
Other Meeting Materials -
> **The Big Picture Timeline**

**MICRC Meeting** - **Jan. 12, 2021**
Meeting Notice - **Jan. 12, 2021**
Agenda - **Jan. 12, 2021**
Approved Minutes - **Jan. 12, 2021**
Proposed Minutes - **Jan. 12, 2021**
Written Public Comment - **Jan. 12, 2021**
Transcript - **Jan. 12, 2021**
Other Meeting Materials -
> **Conflicts of Interest** PPTX
> **Communications and Outreach Director Interview Questions**
> **Communications Director Candidates online presence**
> **Communications and Outreach Director Candidate Applications and Supplemental Materials**
> **Bill Froehlich**
> **Janet Lebson**
> **Walter Sorg**
> **Edward Woods**

**MICRC Meeting** - **Jan. 7, 2021**
Meeting Notice - **Jan. 7, 2021**
Agenda - **Jan. 7, 2021**
Approved Minutes - **Jan. 7, 2021**
Proposed Minutes - **Jan. 7, 2021**
Written Public Comment - **Jan. 7, 2021**
Transcript - **Jan. 7, 2021**
Other Meeting Materials -
> **Hiring of General Counsel**
> **Interview recommendations for Communications and Outreach Director**
> **Policy for approval or expenses**
> **Staff Organizational Chart**
> **Commissioner Correspondence**

Def. App. 163a

> Communications and Outreach Director Candidate Applications and Supplemental Materials
> Bill Froehlich
> Sonja Howell
> Amy Hybels
> Janet Lebson
> Walter Sorg
> Edward Woods
> Andrea Taylor (withdrew candidacy)

**MICRC Meeting - Dec. 17, 2020**
Meeting Notice - **Dec. 17, 2020**
Agenda - **Dec. 17, 2020**
Approved Minutes - **Dec. 17, 2020**
Proposed Minutes - **Dec. 17, 2020**
Written Public Comment - **Dec. 17, 2020**
Transcript - **Dec. 17, 2020**
Other Meeting Materials -
> **Commissioner Responsibility Matrix**

**MICRC Meeting - Dec. 10, 2020**
Meeting Notice - **Dec. 10, 2020**
Agenda - **Dec. 10, 2020**
Approved Minutes - **Dec. 10, 2020**
Proposed Minutes - **Dec. 10, 2020**
Written Public Comment - **Dec. 10, 2020**
Transcript - **Dec. 10, 2020**
Other Meeting Materials -
> **Commissioner Responsibility Matrix**
> **General Counsel Candidates Online Presence**
> **Proposed General Counsel Interview Questions**
> **Draft General Counsel Interview Notes**
> General Counsel Finalist Candidate Applications and Supplemental Materials
> **Monifa Gray**
> **Katherine Kerwin**
> **James Lancaster**
> **Julianne Pastula**

**MICRC Meeting - Dec. 4, 2020**
Meeting Notice - **Dec. 4, 2020**
Agenda - **Dec. 4, 2020**
Approved Minutes - **Dec. 4, 2020**
Proposed Minutes - **Dec. 4, 2020**
Written Public Comment - **Dec. 4, 2020**

**Def. App. 164a**

Transcript - **Dec. 4, 2020**
Other Meeting Materials -
> **Offer letter** PDF

**MICRC Meeting - Dec. 3, 2020**
Meeting Notice - **Dec. 3, 2020**
Agenda - **Dec. 3, 2020**
Approved Minutes - **Dec. 3, 2020**
Proposed Minutes - **Dec. 3, 2020**
Written Public Comment - **Dec. 3, 2020**
Transcript - **Dec. 3, 2020**
Other Meeting Materials -
> **Commissioner Responsibility Matrix**

**MICRC Meeting - Dec. 1, 2020**
Meeting Notice - **Dec. 1, 2020**
Agenda - **Dec. 1, 2020**
Approved Minutes - **Dec. 1, 2020**
Proposed Minutes - **Dec. 1 2020**
Written Public Comment - **Dec. 1, 2020**
Transcript - **Dec. 1, 2020**
Other Meeting Materials -
> **McMillin Correspondence**
> **Commissioner Responsibility Matrix**
> **General Counsel scoring sheet**
> Executive Director Finalist Candidate Applications and Supplemental Materials
> **Brandon Brice**
> **Suann Courtright Hammersmith**
> **Vickie Devould**
> **Sheryl Mitchell**
> **Janette Phillips**
> **Amna Seibold**

**MICRC Committee Meeting - Nov. 20, 2020**
Meeting Notice - **Nov. 20, 2020**
Agenda - **Nov. 20, 2020**
Approved Minutes - **Nov. 20, 2020**
Proposed Minutes - **Nov. 20, 2020**
Written Public Comment - **Nov. 20, 2020**
Transcript - **Nov. 20, 2020**
Other Meeting Materials -
> **Draft ED Interview Questions**
> **ED Candidates Online Footprint**
> **Interview and Hiring Best Practices**

**Def. App. 165a**

**MICRC Committee Meeting - Nov. 20, 2020**
Meeting Notice - **Nov. 20, 2020**
Agenda - **Nov. 20, 2020**
Approved Minutes - **Nov. 20, 2020**
Proposed Minutes - **Nov. 20, 2020**
Written Public Comment - **Nov. 20, 2020**
Transcript - **Nov. 20, 2020**
Other Meeting Materials -
> **Proposed General Counsel Scoring Sheet**
> **Proposed General Counsel Total Scoring Sheet Summary Sorted**
> **Interview and Hiring Best Practices**

**MICRC Committee Meeting - Nov. 19, 2020**
Meeting Notice - **Nov. 19, 2020**
Agenda - **Nov. 19, 2020**
Approved Minutes - **Nov. 19, 2020**
Proposed Minutes - **Nov. 19, 2020**
Written Public Comment - **Nov. 19, 2020**
Transcript - **Nov. 19, 2020**
Other Meeting Materials -
> **ICRC Discussed Correspondence**
> **Commissioners Responsibility Matrix**

**MICRC Meeting - Nov. 10, 2020**
Meeting Notice - **Nov. 10, 2020**
Agenda - **Nov. 10, 2020**
Approved Minutes - **Nov. 10, 2020**
Proposed Minutes - **Nov. 10, 2020**
Written Public Comment -
Transcript -
Other Meeting Materials -
> **Final Code of Conduct**
> **Commissioner Responsibilities Matrix**
> **FY21 ICRC Budget**
> **Laptop selection**

✖

**MICRC Committee Meeting - Nov. 10, 2020**
Meeting Notice - **Nov. 10, 2020**
Agenda - **Nov. 10, 2020**
Approved Minutes - **Nov. 10, 2020**
Proposed Minutes - **Nov. 10, 2020**
Written Public Comment -
Transcript - **Nov. 10, 2020**
Other Meeting Materials -
> **Commissioner Responsibilities Matrix**

Def. App. 166a

⌃

> Draft RFP Statement of Work Redistricting Assistance
> Draft RFP Statement of Work Outreach Consultants
> Draft RFP Statement of Work Community of Interest Polarized Voting Analyst Assistance and Expertise

**MICRC Meeting - Oct. 17, 2020**
Meeting Notice - **Oct. 17, 2020**
Agenda - **Oct. 17, 2020**
Approved Minutes - **Oct. 17, 2020**
Proposed Minutes - **Oct. 17, 2020**
Written Public Comment - **Oct. 17, 2020**
Transcript - **Oct. 17, 2020**
Other Meeting Materials -
> **Commission Member Responsibility Matrix**
> **Lobbying Code of Contact**
> **Draft ICRC Thank You Email**
> **FY21 ICR Budget**

**MICRC Committee Meeting - Oct. 17, 2020**
Meeting Notice - **Oct. 17, 2020**
Agenda - **Oct. 17, 2020**
Approved Minutes - **Oct. 17, 2020**
Proposed Minutes -  **Oct. 17, 2020**
Written Public Comment - **Oct. 17, 2020**
Transcript - **Oct. 17, 2020**
Other Meeting Materials -
> **Commissioner Responsibility Matrix**
> **ICRC Executive Director Search Agenda**

**MICRC Meeting - Oct. 1, 2020**
Meeting Notice - **Oct. 1, 2020**
Agenda - **Oct. 1, 2020**
Approved Minutes - **Oct. 1, 2020**
Proposed Minutes - **Oct. 1, 2020**
Written Public Comment - **Oct. 1, 2020**
Transcript - **Oct. 1, 2020**
Other Meeting Materials -
> **Documents**
> **Proposal from Commissioner Eid**

**MICRC Meeting - Sept. 25, 2020**
Meeting Notice - **Sept. 25, 2020**
Agenda - **Sept. 25, 2020**
Approved Minutes - **Sept. 25, 2020**
Proposed Minutes - **Sept. 25, 2020**

**Def. App. 167a**

Written Public Comment - **Sept. 25, 2020**
Transcript - **Sept. 25, 2020**
Other Meeting Materials -
> **Draft Documents**

**MICRC Meeting - Sept. 18, 2020 PM**
Meeting Notice - **Sept. 18, 2020**
Agenda - **Sept. 18, 2020**
Approved Minutes - **Sept. 18, 2020**
Proposed Minutes - **Sept. 18, 2020**
Written Public Comment - **Sept. 18, 2020**
Transcript - **Sept. 18, 2020**
Other Meeting Materials -
> **Agenda and orientation materials**

**MICRC Meeting - Sept. 18, 2020 AM**
Meeting Notice - **Sept. 18, 2020**
Agenda - **Sept. 18, 2020**
Approved Minutes - **Sept. 18, 2020**
Proposed Minutes - **Sept. 18, 2020**
Written Public Comment - **Sept. 18, 2020**
Transcript - **Sept. 18, 2020 AM**
Other Meeting Materials -
> **Agenda and orientation materials**

**MICRC Meeting - Sept. 17, 2020 PM**
Meeting Notice - **Sept. 17, 2020**
Agenda - **Sept. 17, 2020**
Approved Minutes - **Sept. 17, 2020**
Proposed Minutes - **Sept. 17, 2020**
Written Public Comment - **Sept. 17, 2020**
Transcript - **Sept. 17, 2020 PM**
Other Meeting Materials -
> **Agenda and orientation materials**

**MICRC Meeting - Sept. 17, 2020 AM**
Meeting Notice - **Sept. 17, 2020**
Agenda - **Sept. 17, 2020**
Approved Minutes - **Sept. 17, 2020**
Proposed Minutes - **Sept. 17, 2020**
Written Public Comment - **Sept. 17, 2020**
Transcript - **Sept. 17, 2020 AM**
Other Meeting Materials -
> **Agenda and orientation materials**

**Def. App. 168a**

**Contact Us | MICRC, PO Box 30318, Lansing MI 48909 | Subscribe for Updates**

Related Documents
**Wagner-Gronda Attorney Letter** 📕

**MICRC Home**

**MICHIGAN.GOV HOME**
**ADA**
**MICHIGAN NEWS**
**POLICIES**

**COPYRIGHT 2022 STATE OF MICHIGAN**

Def. App. 169a

| DISTRICT | Total Population | | | | Racial Demographics as Percent of Total Population | | | | | Voting Age Population | | Racial Demographics as Percent of Voting Population | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | All Persons | Target | Dev | Difference | NH White | NH Black | NH Asian | Hispanic | Minority | VAP | % of Total | NH White | NH Black | NH Asian | Hispanic | Minority |
| 1 | 775,375 | 775,179 | 0.03% | 196 | 89.45% | 0.92% | 0.55% | 2.04% | 10.55% | 633,080 | 81.6% | 90.86% | 0.99% | 0.55% | 1.62% | 9.14% |
| 2 | 774,997 | 775,179 | -0.02% | -182 | 87.82% | 1.99% | 0.55% | 4.65% | 12.18% | 606,868 | 78.3% | 89.17% | 2.21% | 0.56% | 3.82% | |
| 3 | 775,414 | 775,179 | 0.03% | 235 | 70.15% | 11.66% | 2.99% | 10.67% | 29.85% | 597,448 | 77.0% | 74.00% | 10.25% | 2.95% | 8.81% | |
| 4 | 774,600 | 775,179 | -0.07% | -579 | 75.09% | 8.32% | 2.46% | 8.56% | 24.91% | 593,972 | 76.7% | 78.42% | 7.71% | 2.46% | 7.05% | |
| 5 | 774,544 | 775,179 | -0.08% | -635 | 84.50% | 4.07% | 0.86% | 5.18% | 15.50% | 606,306 | 78.3% | 86.61% | 4.04% | 0.88% | 4.13% | |
| 6 | 775,273 | 775,179 | 0.01% | 94 | 69.15% | 9.00% | 10.38% | 4.96% | 30.85% | 619,426 | 79.9% | 71.51% | 9.53% | 10.12% | 4.34% | |
| 7 | 775,238 | 775,179 | 0.01% | 59 | 79.90% | 5.89% | 3.20% | 5.66% | 20.10% | 611,160 | 78.8% | 82.03% | 5.67% | 3.23% | 4.77% | |
| 8 | 775,229 | 775,179 | 0.01% | 50 | 73.40% | 14.85% | 1.11% | 5.35% | 26.60% | 606,390 | 78.2% | 76.23% | 13.91% | 1.14% | 4.44% | |
| 9 | 774,962 | 775,179 | -0.03% | -217 | 87.94% | 2.25% | 1.31% | 3.88% | 12.06% | 606,770 | 78.3% | 89.59% | 2.18% | 1.28% | 3.14% | |
| 10 | 775,218 | 775,179 | 0.00% | 39 | 72.75% | 13.27% | 6.08% | 3.03% | 27.25% | 620,272 | 80.0% | 75.73% | 12.09% | 5.78% | 2.56% | |
| 11 | 775,568 | 775,179 | 0.05% | 389 | 68.30% | 12.94% | 8.67% | 5.33% | 31.70% | 624,065 | 80.5% | 70.86% | 12.50% | 8.39% | 4.47% | |
| 12 | 775,247 | 775,179 | 0.01% | 68 | 45.95% | 44.43% | 1.81% | 3.26% | 54.05% | 596,111 | 76.9% | 47.46% | 43.81% | 1.97% | 2.85% | |
| 13 | 775,666 | 775,179 | 0.06% | 487 | 36.80% | 45.33% | 2.89% | 10.26% | 63.20% | 592,734 | 76.4% | 39.55% | 44.70% | 2.89% | 8.77% | |
| Assigned | 10077331 | | | | | | | | | | | | | | | |
| Total Pop | 10077331 | | | | | | | | | | | | | | | |
| Unassigned | 0 | | | | | | | | | | | | | | | |

Def. App. 170a

| DISTRICT | POPTOT | Percent tot | POPWH_A | PWhite_A | POPBL_A | PHispbl_A | POPNA_A | PHispNA_A | POPAS_A | PHispas_A | POPPI_A | PHispPI_A | POPOT_A | PHispOT_A | POPXX | PXmulaoo | HispNonW | PHispNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 775,375 | 100.00% | 699,352 | 90.26% | 7,242 | 0.93% | 19,104 | 2.46% | 4,335 | 0.56% | 262 | 0.03% | 4,945 | 0.64% | 48,137 | 5.19% | 76,023 | 9.80% |
| 2 | 774,957 | 100.00% | 694,248 | 89.58% | 15,815 | 2.04% | 6,551 | 0.85% | 4,335 | 0.56% | 318 | 0.03% | 11,434 | 1.48% | 42,396 | 5.47% | 80,749 | 10.42% |
| 3 | 775,414 | 100.00% | 561,063 | 72.36% | 88,124 | 11.36% | 5,063 | 0.65% | 23,379 | 3.02% | 279 | 0.03% | 39,972 | 5.15% | 57,574 | 7.42% | 214,351 | 27.64% |
| 4 | 774,890 | 100.00% | 597,296 | 77.11% | 65,978 | 8.52% | 4,728 | 0.61% | 19,387 | 2.49% | 268 | 0.03% | 29,135 | 3.76% | 57,894 | 7.47% | 177,304 | 22.89% |
| 5 | 774,544 | 100.00% | 667,117 | 86.13% | 32,338 | 4.17% | 3,854 | 0.50% | 6,708 | 0.87% | 221 | 0.03% | 14,758 | 1.90% | 48,494 | 6.39% | 107,427 | 13.87% |
| 6 | 775,373 | 100.00% | 546,417 | 70.48% | 77,914 | 10.05% | 2,361 | 0.30% | 80,709 | 10.41% | 282 | 0.04% | 13,282 | 1.59% | 55,373 | 7.14% | 228,856 | 29.52% |
| 7 | 775,238 | 100.00% | 632,729 | 81.62% | 47,103 | 6.08% | 3,276 | 0.42% | 24,963 | 3.23% | 387 | 0.04% | 13,780 | 1.78% | 53,069 | 6.85% | 142,518 | 18.38% |
| 8 | 775,229 | 100.00% | 583,391 | 75.25% | 117,974 | 15.11% | 3,297 | 0.43% | 8,746 | 1.13% | 299 | 0.04% | 12,423 | 1.60% | 49,939 | 6.44% | 191,878 | 24.75% |
| 9 | 774,962 | 100.00% | 691,045 | 89.17% | 17,864 | 2.31% | 2,487 | 0.32% | 18,254 | 1.32% | 183 | 0.02% | 8,756 | 1.13% | 44,333 | 5.72% | 83,917 | 10.83% |
| 10 | 775,218 | 100.00% | 570,035 | 73.53% | 103,790 | 13.39% | 2,031 | 0.26% | 47,336 | 6.11% | 169 | 0.02% | 7,821 | 1.02% | 44,021 | 5.68% | 205,193 | 26.47% |
| 11 | 775,568 | 100.00% | 539,241 | 69.53% | 101,828 | 13.13% | 2,142 | 0.28% | 67,402 | 8.69% | 190 | 0.02% | 16,278 | 2.10% | 48,487 | 6.25% | 238,327 | 30.47% |
| 12 | 775,247 | 100.00% | 362,007 | 46.70% | 346,735 | 44.73% | 2,227 | 0.29% | 14,155 | 1.83% | 190 | 0.02% | 10,447 | 1.35% | 39,526 | 5.10% | 413,240 | 53.30% |
| 13 | 775,666 | 100.00% | 301,082 | 38.82% | 354,732 | 45.73% | 4,182 | 0.54% | 22,591 | 2.91% | 268 | 0.03% | 39,741 | 5.12% | 53,072 | 6.84% | 474,584 | 61.18% |

Def. App. 171a

2022 10:...0:25 PM

Def. App. 172a

| DISTRICT | POPTOT | PercentDev | POPWH_C | PPopWH_C | POPBL_C | PPopBL_C | POPNA_C | PPopNA_C | POPAS_C | PPopAS_C | POPPL_C | PPopPL_C | POPOT_C | PPopOT_C | PopNonW | PPopNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 775,375 | 105.46% | 738,470 | 95.24% | 12,066 | 1.56% | 40,338 | 5.29% | 7,690 | 0.99% | 1,068 | 0.14% | 18,045 | 2.33% | 36,905 | 4.76% |
| 2 | 774,997 | 105.75% | 735,710 | 94.93% | 22,794 | 2.94% | 22,360 | 2.89% | 7,723 | 1.00% | 807 | 0.10% | 30,165 | 3.89% | 39,287 | 5.07% |
| 3 | 775,414 | 107.90% | 614,760 | 79.28% | 105,289 | 13.58% | 17,973 | 2.32% | 29,900 | 3.86% | 1,063 | 0.14% | 67,667 | 8.73% | 160,654 | 20.72% |
| 4 | 774,600 | 107.91% | 652,473 | 84.23% | 82,069 | 10.60% | 19,716 | 2.55% | 25,242 | 3.26% | 967 | 0.12% | 55,375 | 7.15% | 122,127 | 15.77% |
| 5 | 774,544 | 106.72% | 715,150 | 92.33% | 44,448 | 5.74% | 20,861 | 2.69% | 19,674 | 1.38% | 708 | 0.09% | 34,745 | 4.49% | 59,394 | 7.67% |
| 6 | 775,273 | 107.64% | 598,756 | 77.23% | 91,635 | 11.82% | 14,831 | 1.91% | 92,962 | 11.87% | 1,918 | 0.13% | 36,181 | 4.67% | 176,517 | 22.77% |
| 7 | 775,238 | 107.25% | 683,555 | 88.17% | 61,098 | 7.88% | 18,180 | 2.35% | 31,172 | 4.02% | 1,026 | 0.13% | 36,406 | 4.70% | 91,683 | 11.83% |
| 8 | 775,229 | 106.89% | 630,826 | 81.37% | 132,438 | 17.08% | 18,963 | 2.45% | 12,551 | 1.62% | 796 | 0.10% | 32,317 | 4.17% | 144,403 | 18.63% |
| 9 | 774,962 | 105.99% | 734,261 | 94.75% | 25,456 | 3.28% | 17,123 | 2.21% | 15,113 | 1.95% | 576 | 0.07% | 28,823 | 3.72% | 40,701 | 5.25% |
| 10 | 775,218 | 105.99% | 611,513 | 78.88% | 116,066 | 14.97% | 13,855 | 1.79% | 54,707 | 7.06% | 765 | 0.10% | 24,778 | 3.20% | 163,705 | 21.12% |
| 11 | 775,568 | 106.64% | 584,731 | 75.39% | 113,756 | 14.67% | 12,795 | 1.65% | 76,277 | 9.83% | 688 | 0.09% | 38,839 | 5.01% | 190,837 | 24.61% |
| 12 | 775,247 | 105.56% | 396,294 | 51.12% | 363,437 | 46.88% | 12,651 | 1.63% | 20,578 | 2.65% | 739 | 0.09% | 24,639 | 3.18% | 378,953 | 48.88% |
| 13 | 775,666 | 107.38% | 348,076 | 44.87% | 373,556 | 48.16% | 16,785 | 2.16% | 28,229 | 3.64% | 1,913 | 0.13% | 65,288 | 8.42% | 427,590 | 55.13% |

Def. App. 173a

| DISTRICT | POPTOT | Persen(%) | POPHWHT_C | PPopHWHT_C | POPHNBL_C | PPopHNBL_C | POPHNBA_C | PPopHNBA_C | POPHNAS_C | PPopHNAS_C | POPHNPI_C | PPopHNPI_C | POPHNOT_C | PPopHNOT_C | POPHESP | PPopHisp | PopHwhW | PPopHwhW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 775,375 | 104.56% | 726,790 | 93.73% | 11,365 | 1.47% | 36,650 | 4.98% | 7,255 | 0.94% | 679 | 0.11% | 9,85X | 1.3% | 15,847 | 2.04% | 48,585 | 6.27% |
| 2 | 774,980 | 104.15% | 710,889 | 91.73% | 21,627 | 2.79% | 19,937 | 2.57% | 7,252 | 0.95% | 699 | 0.09% | 10,623 | 1.37% | 36,060 | 4.65% | 64,166 | 8.27% |
| 3 | 775,414 | 104.68% | 576,312 | 74.32% | 99,605 | 12.85% | 13,228 | 1.71% | 29,184 | 3.76% | 860 | 0.11% | 9,679 | 1.25% | 82,780 | 10.67% | 199,102 | 25.68% |
| 4 | 774,600 | 105.03% | 614,927 | 79.64% | 78,612 | 10.15% | 15,826 | 2.04% | 24,419 | 3.15% | 830 | 0.11% | 10,612 | 1.37% | 66,354 | 8.56% | 157,673 | 20.30% |
| 5 | 774,564 | 104.94% | 689,565 | 89.03% | 42,311 | 5.46% | 18,404 | 2.38% | 13,263 | 1.33% | 505 | 0.07% | 10,79X | 1.39% | 40,121 | 5.18% | 84,959 | 10.97% |
| 6 | 775,272 | 105.23% | 571,986 | 73.78% | 88,932 | 11.46% | 12,453 | 1.61% | 91,326 | 11.78% | 880 | 0.11% | 11,86X | 1.53% | 38,423 | 4.98% | 203,287 | 26.22% |
| 7 | 775,238 | 104.87% | 654,079 | 84.37% | 57,424 | 7.41% | 15,342 | 1.98% | 30,495 | 3.93% | 888 | 0.11% | 10,823 | 1.40% | 43,903 | 5.66% | 121,159 | 15.63% |
| 8 | 775,229 | 104.81% | 602,811 | 77.76% | 139,986 | 18.99% | 16,672 | 2.17% | 12,165 | 1.57% | 714 | 0.09% | 10,274 | 1.39% | 41,495 | 5.35% | 172,415 | 22.24% |
| 9 | 774,982 | 104.30% | 712,578 | 91.95% | 24,057 | 3.10% | 15,317 | 1.98% | 14,666 | 1.89% | 500 | 0.06% | 10,90X | 1.42% | 29,890 | 3.86% | 62,384 | 8.05% |
| 10 | 775,216 | 104.51% | 595,322 | 76.79% | 114,139 | 14.72% | 12,293 | 1.59% | 54,204 | 6.99% | 664 | 0.09% | 10,081 | 1.30% | 23,457 | 3.03% | 178,896 | 23.21% |
| 11 | 775,568 | 104.36% | 599,725 | 77.17% | 119,723 | 14.39% | 10,538 | 1.36% | 75,698 | 9.75% | 614 | 0.08% | 10,602 | 1.40% | 41,334 | 5.33% | 215,843 | 27.83% |
| 12 | 775,247 | 104.15% | 381,685 | 49.27% | 359,510 | 46.37% | 10,880 | 1.40% | 20,111 | 2.59% | 622 | 0.08% | 9,379 | 1.21% | 25,253 | 3.30% | 393,562 | 50.77% |
| 13 | 775,660 | 104.34% | 311,918 | 40.23% | 368,010 | 47.45% | 12,412 | 1.60% | 27,687 | 3.57% | 821 | 0.11% | 8,984 | 1.15% | 79,565 | 10.29% | 463,748 | 59.70% |

Def. App. 174a

| DISTRICT | POPTOT | PercentTot | POPWH_A | PP.rpWh_A | POPBL_W | PP.rpBL_W | POPNA_W | PP.rpNA_W | POPAS_W | PP.rpAS_W | POPPL_W | PP.rpPL_W | POPOT_W | PP.rpOT_W | PopNonW | PP.rpNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 775,375 | 95.11% | 699,352 | 90.29% | 7,839 | 1.01% | 19,605 | 2.53% | 4,750 | 0.61% | 496 | 0.06% | 5,381 | 0.69% | 76,023 | 9.80% |
| 2 | 774,997 | 94.78% | 694,248 | 89.58% | 16,368 | 2.11% | 7,919 | 0.91% | 4,637 | 0.60% | 399 | 0.05% | 11,996 | 1.54% | 80,749 | 10.42% |
| 3 | 775,414 | 93.59% | 561,063 | 72.36% | 91,141 | 11.75% | 6,538 | 0.84% | 24,106 | 3.11% | 509 | 0.06% | 42,354 | 5.46% | 214,351 | 27.64% |
| 4 | 774,690 | 93.24% | 597,296 | 77.11% | 67,952 | 8.77% | 6,038 | 0.78% | 19,876 | 2.57% | 414 | 0.05% | 39,649 | 3.96% | 177,304 | 22.89% |
| 5 | 774,544 | 94.00% | 667,117 | 86.13% | 33,487 | 4.32% | 4,472 | 0.58% | 7,967 | 0.91% | 335 | 0.04% | 15,564 | 2.01% | 107,427 | 13.87% |
| 6 | 775,273 | 93.65% | 546,417 | 70.48% | 80,325 | 10.36% | 3,526 | 0.45% | 81,639 | 10.53% | 569 | 0.07% | 13,613 | 1.76% | 228,856 | 29.52% |
| 7 | 775,238 | 93.74% | 632,729 | 81.62% | 48,862 | 6.30% | 4,127 | 0.53% | 25,510 | 3.29% | 512 | 0.07% | 15,099 | 1.90% | 142,518 | 18.38% |
| 8 | 775,229 | 94.29% | 583,351 | 75.25% | 119,318 | 15.39% | 4,551 | 0.59% | 9,115 | 1.18% | 416 | 0.05% | 13,516 | 1.74% | 191,878 | 24.75% |
| 9 | 774,962 | 94.57% | 691,045 | 89.17% | 18,707 | 2.41% | 2,946 | 0.38% | 10,610 | 1.37% | 267 | 0.03% | 9,342 | 1.21% | 83,917 | 10.83% |
| 10 | 775,218 | 94.99% | 570,035 | 73.53% | 105,729 | 13.64% | 3,135 | 0.40% | 48,150 | 6.21% | 356 | 0.05% | 8,933 | 1.15% | 205,183 | 26.47% |
| 11 | 775,568 | 94.53% | 539,241 | 69.53% | 104,198 | 13.44% | 3,387 | 0.44% | 68,310 | 8.81% | 389 | 0.05% | 17,644 | 2.27% | 236,327 | 30.47% |
| 12 | 775,247 | 96.27% | 362,007 | 46.70% | 351,537 | 45.35% | 5,935 | 0.65% | 15,097 | 1.95% | 375 | 0.05% | 12,317 | 1.59% | 413,240 | 53.30% |
| 13 | 775,686 | 94.75% | 301,082 | 38.82% | 359,597 | 46.49% | 7,356 | 0.95% | 23,617 | 3.04% | 523 | 0.07% | 42,431 | 5.47% | 474,584 | 61.18% |

2022 10:00:25 PM

Def. App. 175a

| DISTRICT | POPTOT | Person Info | POPNHWH_A | PersonNH | POPNHBL_W | PersonBL | POPNHNA_W | PersonNA | POPNHAS_W | PersonAS | POPNHPI_W | PersonPI | POPNHOT_W | PersonOT | POPNH2+_W | POPNHOT2_W | PersonOT | POPHISP | PPopHisp | PopNonW | PPopNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 775,325 | 95.82% | 693,536 | 89.45% | 7,525 | 0.97% | 18,867 | 2.43% | 4,569 | 0.59% | 365 | 0.05% | 2,291 | 0.29% | 15,847 | 2.04% | 81,839 | 10.55% |
| 2 | 774,990 | 96.17% | 680,691 | 87.82% | 15,733 | 2.03% | 5,894 | 0.76% | 4,598 | 0.59% | 310 | 0.04% | 2,228 | 0.29% | 30,046 | 4.65% | 94,398 | 12.18% |
| 3 | 775,414 | 96.87% | 543,947 | 70.15% | 87,385 | 11.27% | 3,520 | 0.45% | 23,719 | 3.06% | 354 | 0.05% | 3,282 | 0.42% | 82,700 | 10.67% | 231,467 | 29.85% |
| 4 | 774,600 | 95.65% | 581,638 | 75.09% | 65,893 | 8.50% | 3,701 | 0.48% | 19,644 | 2.51% | 332 | 0.04% | 3,698 | 0.48% | 66,314 | 8.56% | 192,962 | 24.91% |
| 5 | 774,544 | 95.60% | 654,497 | 84.50% | 32,326 | 4.17% | 3,266 | 0.44% | 6,920 | 0.89% | 293 | 0.04% | 2,872 | 0.37% | 40,121 | 5.18% | 170,047 | 15.50% |
| 6 | 775,273 | 95.67% | 536,084 | 69.15% | 78,620 | 10.14% | 2,496 | 0.32% | 81,360 | 10.49% | 486 | 0.06% | 4,276 | 0.55% | 38,423 | 4.96% | 239,189 | 30.85% |
| 7 | 775,239 | 95.71% | 619,440 | 79.90% | 66,739 | 8.03% | 2,909 | 0.38% | 25,208 | 3.25% | 437 | 0.06% | 3,348 | 0.43% | 43,903 | 5.66% | 155,798 | 20.10% |
| 8 | 775,229 | 95.87% | 569,036 | 73.40% | 119,725 | 15.06% | 3,433 | 0.44% | 8,957 | 1.14% | 377 | 0.05% | 3,165 | 0.41% | 41,695 | 5.38% | 206,193 | 26.60% |
| 9 | 774,982 | 96.09% | 681,480 | 87.94% | 17,993 | 2.32% | 2,238 | 0.29% | 10,644 | 1.35% | 226 | 0.03% | 2,365 | 0.31% | 29,890 | 3.86% | 93,482 | 12.06% |
| 10 | 775,218 | 96.22% | 563,098 | 72.76% | 104,912 | 13.48% | 2,897 | 0.37% | 87,967 | 6.18% | 202 | 0.04% | 3,255 | 0.42% | 23,857 | 3.03% | 211,220 | 27.25% |
| 11 | 775,568 | 94.49% | 529,713 | 68.30% | 102,145 | 13.17% | 3,323 | 0.30% | 68,037 | 8.77% | 327 | 0.04% | 3,800 | 0.49% | 41,334 | 5.33% | 245,855 | 31.70% |
| 12 | 775,247 | 97.28% | 356,248 | 45.95% | 348,475 | 44.95% | 4,194 | 0.54% | 14,696 | 1.92% | 307 | 0.04% | 4,806 | 0.62% | 25,253 | 3.26% | 418,999 | 54.05% |
| 13 | 775,666 | 97.17% | 285,433 | 36.80% | 355,699 | 45.85% | 4,800 | 0.59% | 23,333 | 3.01% | 393 | 0.05% | 4,782 | 0.61% | 79,565 | 10.26% | 490,233 | 63.20% |

Def. App. 176a

| DISTRICT | VAPTOT | PercentTot | VAPWH_A | PVAPWH_A | VAPBL_A | PVAPBL_A | VAPNA_A | PVAPNA_A | VAPAS_A | PVAPAS_A | VAPPI_A | PVAPPI_A | VAPOT_A | PVAPOT_A | VAPIXX | PVAPIXX | PopHawW | PFPopHawW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 633,080 | 100.00% | 578,842 | 91.43% | 6,363 | 1.01% | 13,817 | 2.18% | 3,552 | 0.56% | 167 | 0.03% | 3,776 | 0.59% | 26,558 | 4.20% | 54,238 | 8.57% |
| 2 | 606,808 | 100.00% | 548,679 | 90.58% | 13,714 | 2.26% | 4,948 | 0.82% | 3,467 | 0.57% | 134 | 0.02% | 8,072 | 1.33% | 26,854 | 4.43% | 57,189 | 9.42% |
| 3 | 597,448 | 100.00% | 452,443 | 75.73% | 62,305 | 10.44% | 3,882 | 0.64% | 17,773 | 2.97% | 181 | 0.03% | 26,726 | 4.47% | 34,166 | 5.72% | 145,005 | 24.27% |
| 4 | 569,872 | 100.00% | 474,949 | 79.90% | 46,512 | 7.83% | 3,635 | 0.58% | 14,749 | 2.49% | 186 | 0.03% | 19,994 | 3.36% | 34,177 | 5.75% | 119,023 | 20.84% |
| 5 | 608,306 | 100.00% | 532,518 | 87.83% | 24,849 | 4.10% | 2,918 | 0.48% | 5,366 | 0.88% | 164 | 0.03% | 10,132 | 1.67% | 30,341 | 5.00% | 73,788 | 12.13% |
| 6 | 619,426 | 100.00% | 450,197 | 72.68% | 59,814 | 9.66% | 1,861 | 0.30% | 62,854 | 10.15% | 247 | 0.04% | 8,998 | 1.45% | 35,487 | 5.73% | 169,228 | 27.32% |
| 7 | 611,580 | 100.00% | 509,751 | 83.41% | 35,332 | 5.78% | 2,658 | 0.43% | 19,848 | 3.25% | 248 | 0.04% | 10,454 | 1.71% | 32,868 | 5.38% | 181,409 | 14.59% |
| 8 | 606,390 | 100.00% | 471,059 | 77.68% | 85,247 | 14.06% | 2,615 | 0.43% | 6,868 | 1.13% | 191 | 0.03% | 9,292 | 1.53% | 30,988 | 5.11% | 135,331 | 22.32% |
| 9 | 606,770 | 100.00% | 549,281 | 90.53% | 13,514 | 2.23% | 2,003 | 0.33% | 7,847 | 1.29% | 132 | 0.02% | 6,282 | 1.04% | 27,731 | 4.57% | 57,489 | 9.47% |
| 10 | 629,272 | 100.00% | 473,713 | 79.33% | 75,446 | 12.11% | 1,817 | 0.30% | 35,995 | 5.86% | 137 | 0.02% | 5,678 | 0.92% | 27,069 | 4.44% | 146,559 | 23.89% |
| 11 | 624,065 | 100.00% | 448,524 | 71.87% | 78,754 | 12.62% | 1,684 | 0.27% | 52,484 | 8.41% | 159 | 0.03% | 11,418 | 1.83% | 31,064 | 4.98% | 175,541 | 28.13% |
| 12 | 596,111 | 100.00% | 296,719 | 49.10% | 262,454 | 44.03% | 1,778 | 0.30% | 11,823 | 1.98% | 119 | 0.02% | 7,426 | 1.25% | 25,790 | 4.33% | 309,392 | 51.90% |
| 13 | 592,734 | 100.00% | 244,251 | 41.21% | 266,749 | 45.00% | 3,171 | 0.53% | 17,279 | 2.92% | 209 | 0.04% | 26,425 | 4.46% | 34,650 | 5.85% | 348,683 | 58.79% |

Def. App. 177a

| DISTRICT | VAPTOT | P_VAPHISP | VAPHISP_A | P_VAPNHISP | VAPNHBEL_A | P_VAPNHBEL | VAPNHBL_A | P_VAPNHINS | VAPNHAS_A | P_VAPNHAS | VAPNHAI_A | P_VAPNHAI | VAPNHOT_A | P_VAPNHENI | VAPNHISP | P_VAPNHISP | VAPHISP | P_VAPHISP | VAPHISPX | P_VAPHISPX | PopNHW | PPopNHW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 653,088 | 100.00% | 575,217 | 90.08% | 8,283 | 0.69% | 63,808 | 2.12% | 3,495 | 0.55% | 961 | 0.03% | 1,562 | 0.25% | 90,355 | 1.82% | 22,871 | 3.55% | 57,883 | 8.14% |
| 2 | 696,088 | 100.00% | 541,129 | 89.12% | 13,409 | 2.21% | 4,326 | 0.71% | 3,426 | 0.58% | 118 | 0.02% | 1,386 | 0.22% | 23,154 | 3.62% | 59,814 | 3.28% | 60,238 | 10.93% |
| 3 | 597,448 | 100.00% | 442,696 | 74.06% | 61,275 | 93.25% | 2,531 | 0.36% | 17,648 | 7.95% | 143 | 0.02% | 1,833 | 0.31% | 52,640 | 8.81% | 99,731 | 3.30% | 150,352 | 26.00% |
| 4 | 599,052 | 100.00% | 466,777 | 78.43% | 40,770 | 7.71% | 2,598 | 0.37% | 14,628 | 7.46% | 157 | 0.03% | 2,125 | 0.36% | 41,881 | 7.05% | 21,465 | 3.41% | 129,200 | 21.58% |
| 5 | 666,366 | 100.00% | 525,142 | 86.61% | 34,483 | 45.44% | 2,281 | 0.38% | 5,337 | 0.89% | 155 | 0.03% | 1,648 | 0.27% | 25,025 | 4.13% | 22,230 | 3.61% | 81,150 | 13.38% |
| 6 | 615,426 | 100.00% | 445,928 | 71.51% | 59,054 | 9.53% | 1,276 | 0.21% | 62,686 | 10.12% | 226 | 0.04% | 2,066 | 0.41% | 26,964 | 4.34% | 23,834 | 3.85% | 176,468 | 28.49% |
| 7 | 611,160 | 100.00% | 501,351 | 82.03% | 348,620 | 5.67% | 1,907 | 0.31% | 19,729 | 3.23% | 231 | 0.03% | 2,030 | 0.33% | 29,147 | 4.77% | 22,139 | 3.62% | 109,809 | 17.97% |
| 8 | 606,380 | 100.00% | 452,261 | 78.23% | 64,346 | 13.91% | 1,958 | 0.32% | 6,919 | 1.14% | 980 | 0.30% | 1,843 | 0.30% | 36,926 | 4.44% | 21,966 | 3.62% | 144,129 | 23.77% |
| 9 | 606,770 | 100.00% | 543,605 | 89.59% | 13,235 | 2.18% | 1,587 | 0.26% | 7,766 | 1.28% | 121 | 0.24% | 1,462 | 0.24% | 59,066 | 3.14% | 59,916 | 3.28% | 63,145 | 10.41% |
| 10 | 626,272 | 100.00% | 464,713 | 75.73% | 74,875 | 12.08% | 1,267 | 0.20% | 36,876 | 6.70% | 101 | 0.30% | 1,079 | 0.17% | 105,846 | 2.56% | 20,613 | 3.32% | 150,569 | 24.27% |
| 11 | 624,060 | 100.00% | 442,233 | 70.86% | 78,008 | 12.60% | 1,098 | 0.17% | 52,384 | 8.39% | 147 | 0.02% | 2,324 | 0.37% | 27,866 | 4.45% | 20,033 | 3.21% | 181,832 | 29.14% |
| 12 | 596,111 | 100.00% | 282,914 | 47.46% | 261,148 | 43.81% | 1,357 | 0.23% | 11,748 | 1.97% | 95 | 0.44% | 2,860 | 0.44% | 57,813 | 7.95% | 59,242 | 3.23% | 313,197 | 52.54% |
| 13 | 592,734 | 100.00% | 234,418 | 39.55% | 264,648 | 44.75% | 1,031 | 0.20% | 17,541 | 2.89% | 503 | 0.03% | 2,478 | 0.42% | 51,578 | 8.77% | 59,906 | 3.37% | 350,324 | 60.45% |

Def. App. 178a

| DISTRICT | VAPTOT | Percent tie | VAPWH_C | PVAPWH_C | VAPBL_C | PVAPBL_C | VAPNA_C | PVAPNA_C | VAPAS_C | PVAPAS_C | VAPPI_C | PVAPPI_C | VAPOT_C | PVAPOT_C | PsupNomW | PPsupNomW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 630,080 | 104.38% | 604,794 | 95.57% | 8,525 | 1.35% | 28,298 | 4.47% | 5,386 | 0.85% | 678 | 0.11% | 13,146 | 2.08% | 28,286 | 4.47% |
| 2 | 606,868 | 104.64% | 575,941 | 94.90% | 16,673 | 2.75% | 15,972 | 2.63% | 5,161 | 0.85% | 480 | 0.08% | 20,773 | 3.42% | 30,927 | 5.10% |
| 3 | 597,448 | 106.03% | 484,178 | 81.04% | 70,012 | 11.72% | 12,616 | 2.11% | 20,945 | 3.51% | 678 | 0.11% | 45,038 | 7.54% | 113,270 | 18.96% |
| 4 | 593,972 | 106.06% | 507,369 | 85.42% | 53,347 | 8.98% | 13,886 | 2.34% | 17,493 | 2.95% | 642 | 0.11% | 37,216 | 6.27% | 86,603 | 14.58% |
| 5 | 606,304 | 105.23% | 561,885 | 92.67% | 29,565 | 4.88% | 15,067 | 2.49% | 7,358 | 1.21% | 474 | 0.08% | 23,679 | 3.91% | 44,421 | 7.33% |
| 6 | 619,426 | 106.11% | 483,535 | 78.06% | 67,116 | 10.84% | 11,145 | 1.80% | 68,823 | 11.11% | 730 | 0.12% | 25,920 | 4.18% | 135,891 | 21.94% |
| 7 | 611,160 | 105.66% | 541,150 | 88.54% | 41,539 | 6.80% | 13,356 | 2.19% | 23,008 | 3.76% | 722 | 0.12% | 25,977 | 4.25% | 70,019 | 11.46% |
| 8 | 606,399 | 105.38% | 500,414 | 82.52% | 91,862 | 15.15% | 14,919 | 2.31% | 9,005 | 1.49% | 494 | 0.08% | 23,054 | 3.80% | 105,976 | 17.48% |
| 9 | 608,770 | 104.75% | 576,308 | 94.98% | 16,550 | 2.73% | 12,316 | 2.03% | 10,076 | 1.66% | 367 | 0.06% | 19,979 | 3.29% | 30,462 | 5.02% |
| 10 | 620,272 | 104.68% | 499,665 | 80.56% | 81,591 | 13.09% | 10,323 | 1.66% | 40,047 | 6.46% | 529 | 0.09% | 17,519 | 2.82% | 120,697 | 19.44% |
| 11 | 634,065 | 105.25% | 477,525 | 76.52% | 84,964 | 13.41% | 9,546 | 1.53% | 56,976 | 9.13% | 508 | 0.08% | 27,313 | 4.38% | 146,540 | 23.48% |
| 12 | 596,111 | 104.70% | 308,684 | 51.78% | 272,419 | 45.70% | 9,492 | 1.59% | 15,570 | 2.61% | 504 | 0.08% | 17,485 | 2.93% | 287,427 | 48.22% |
| 13 | 592,734 | 106.29% | 274,598 | 46.33% | 277,723 | 46.85% | 12,435 | 2.10% | 20,592 | 3.47% | 697 | 0.12% | 43,948 | 7.41% | 318,136 | 53.67% |

Def. App. 179a

2022 10:10:25 PM

| DISTRICT | VAPTOT | PersonIW | VAPWHNH1_C | P_VAPWHNH1 | VAPWHBL_C | P_VAPWHBL | VAPWHNA_C | P_VAPWHNA | VAPWHAS_C | P_VAPWHAS | VAPWHPI_C | P_VAPWHPI | VAPWHOT_C | P_VAPWHOT | VAPWHSP | P_VAPHisp | PopHisW | PPPopulationW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 633,080 | 103.71% | 597,460 | 94.37% | 8,168 | 1.29% | 27,463 | 4.33% | 5,147 | 0.81% | 554 | 0.09% | 7,040 | 1.11% | 10,255 | 1.62% | 35,620 | 5.63% |
| 2 | 606,868 | 103.40% | 560,657 | 92.39% | 16,019 | 2.64% | 14,524 | 2.39% | 4,965 | 0.82% | 418 | 0.07% | 7,390 | 1.28% | 23,154 | 3.82% | 46,211 | 7.61% |
| 3 | 597,448 | 103.68% | 460,424 | 77.10% | 67,474 | 11.29% | 9,627 | 1.61% | 20,587 | 3.45% | 548 | 0.09% | 6,819 | 1.12% | 52,640 | 8.81% | 138,824 | 22.90% |
| 4 | 593,972 | 103.81% | 486,153 | 81.85% | 51,872 | 8.73% | 11,455 | 1.93% | 17,177 | 2.89% | 555 | 0.09% | 7,256 | 1.27% | 41,861 | 7.05% | 107,819 | 18.15% |
| 5 | 606,306 | 103.80% | 546,746 | 90.18% | 28,743 | 4.74% | 13,528 | 2.23% | 7,143 | 1.18% | 388 | 0.06% | 7,878 | 1.28% | 25,025 | 4.13% | 59,560 | 9.82% |
| 6 | 619,626 | 104.09% | 465,182 | 75.10% | 65,480 | 10.57% | 9,560 | 1.53% | 68,428 | 11.05% | 645 | 0.10% | 9,488 | 1.49% | 26,884 | 4.34% | 154,244 | 24.90% |
| 7 | 611,160 | 103.70% | 522,573 | 85.51% | 40,601 | 6.65% | 11,539 | 1.89% | 22,666 | 3.71% | 630 | 0.10% | 7,742 | 1.27% | 29,147 | 4.77% | 88,587 | 14.49% |
| 8 | 606,380 | 103.79% | 482,875 | 79.66% | 90,352 | 14.90% | 12,395 | 2.04% | 8,805 | 1.45% | 448 | 0.07% | 7,452 | 1.23% | 26,926 | 4.44% | 123,415 | 20.36% |
| 9 | 608,778 | 103.89% | 563,008 | 92.80% | 15,966 | 2.62% | 11,184 | 1.84% | 9,858 | 1.62% | 322 | 0.05% | 7,890 | 1.30% | 19,068 | 3.14% | 43,672 | 7.29% |
| 10 | 620,272 | 103.61% | 488,963 | 78.83% | 80,313 | 12.95% | 9,305 | 1.50% | 39,781 | 6.41% | 450 | 0.07% | 7,239 | 1.17% | 15,848 | 2.56% | 131,300 | 21.17% |
| 11 | 624,065 | 103.37% | 460,797 | 73.84% | 83,479 | 13.38% | 8,023 | 1.29% | 54,650 | 9.08% | 461 | 0.07% | 7,817 | 1.25% | 27,866 | 4.47% | 163,268 | 26.14% |
| 12 | 596,111 | 103.51% | 298,990 | 50.16% | 270,216 | 45.33% | 8,313 | 1.39% | 15,340 | 2.57% | 436 | 0.07% | 6,713 | 1.13% | 17,013 | 2.85% | 297,121 | 49.84% |
| 13 | 592,734 | 103.66% | 251,195 | 42.38% | 274,669 | 46.34% | 9,528 | 1.61% | 20,249 | 3.42% | 570 | 0.10% | 6,354 | 1.07% | 51,978 | 8.77% | 341,539 | 57.62% |

Def. App. 180a

| DISTRICT | VAPTOT | Percentter | VAPWH_A | PVAPWH_A | VAPBL_W | PVAPBL_W | VAPNA_W | PVAPNA_W | VAPAS_W | PVAPAS_W | VAPPI_W | PVAPPI_W | VAPOT_W | PVAPOT_W | PopNonW | PPopNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 633,060 | 96.61% | 578,842 | 91.43% | 6,711 | 1.06% | 14,122 | 2.23% | 3,816 | 0.60% | 363 | 0.06% | 3,980 | 0.63% | 54,238 | 8.57% |
| 2 | 606,868 | 95.78% | 549,679 | 90.58% | 14,037 | 2.31% | 5,267 | 0.87% | 3,681 | 0.61% | 257 | 0.04% | 8,353 | 1.38% | 57,189 | 9.42% |
| 3 | 597,448 | 95.11% | 452,443 | 75.73% | 64,188 | 10.74% | 4,799 | 0.80% | 18,192 | 3.04% | 366 | 0.06% | 28,223 | 4.77% | 145,005 | 24.27% |
| 4 | 593,072 | 94.85% | 474,949 | 79.96% | 47,748 | 8.04% | 4,419 | 0.74% | 15,069 | 2.54% | 308 | 0.05% | 20,850 | 3.51% | 119,023 | 20.04% |
| 5 | 606,308 | 95.33% | 532,518 | 87.83% | 25,081 | 4.22% | 3,385 | 0.56% | 5,601 | 0.92% | 247 | 0.04% | 10,635 | 1.75% | 73,788 | 12.17% |
| 6 | 619,426 | 94.98% | 450,197 | 72.68% | 61,888 | 9.93% | 2,780 | 0.45% | 63,448 | 10.24% | 454 | 0.07% | 9,937 | 1.60% | 169,229 | 27.32% |
| 7 | 611,160 | 95.11% | 509,751 | 83.41% | 36,459 | 5.97% | 3,283 | 0.54% | 20,179 | 3.36% | 406 | 0.07% | 11,216 | 1.84% | 101,409 | 18.59% |
| 8 | 606,390 | 95.43% | 471,059 | 77.68% | 86,621 | 14.20% | 3,537 | 0.58% | 7,243 | 1.19% | 278 | 0.05% | 9,951 | 1.64% | 135,331 | 22.32% |
| 9 | 606,770 | 95.66% | 549,281 | 90.53% | 14,011 | 2.31% | 2,296 | 0.38% | 8,034 | 1.32% | 182 | 0.03% | 6,658 | 1.10% | 57,489 | 9.47% |
| 10 | 620,277 | 96.10% | 473,713 | 76.37% | 76,816 | 12.39% | 2,434 | 0.39% | 36,493 | 5.88% | 276 | 0.04% | 6,342 | 1.02% | 146,559 | 23.63% |
| 11 | 624,065 | 95.69% | 448,524 | 71.87% | 80,366 | 12.88% | 2,605 | 0.42% | 53,060 | 8.50% | 315 | 0.05% | 12,327 | 1.98% | 175,541 | 28.13% |
| 12 | 595,311 | 96.99% | 295,719 | 48.16% | 265,983 | 44.67% | 3,916 | 0.66% | 12,429 | 2.06% | 282 | 0.05% | 8,761 | 1.47% | 309,392 | 51.00% |
| 13 | 592,734 | 95.63% | 244,251 | 41.21% | 270,424 | 45.67% | 5,580 | 0.94% | 17,943 | 3.03% | 373 | 0.06% | 28,235 | 4.78% | 348,483 | 58.79% |

Def. App. 181a

| DISTRICT | VAPTOT | Percentac | VAPR8NHIL_A | P | VAPR8BL_W | P | VAPR8NHW_W | P | VAPR8NHS_W | P | VAPR8SPL_W | P | VAPR8NHP_W | P | VAPR8NDT_W | P | VAPR8SP | PVAPHisp | Pop18sm | PP1sp18m% |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 633,080 | 98.56% | 575,257 | 90.86% | 6,519 | 1.03% | 53,647 | 2.14% | 3,690 | 0.58% | 298 | 0.05% | 1,650 | 0.27% | 10,255 | 1.62% | 57,863 | 9.14% |
| 2 | 606,868 | 98.89% | 541,129 | 89.17% | 13,634 | 2.25% | 4,530 | 0.75% | 3,690 | 0.99% | 216 | 0.04% | 1,587 | 0.25% | 23,154 | 3.82% | 65,739 | 10.83% |
| 3 | 597,448 | 97.10% | 442,096 | 74.00% | 62,271 | 10.42% | 2,766 | 0.46% | 17,940 | 3.00% | 259 | 0.04% | 2,150 | 0.36% | 52,640 | 8.81% | 155,352 | 26.00% |
| 4 | 583,872 | 96.79% | 465,772 | 79.42% | 46,697 | 7.86% | 2,804 | 0.47% | 14,690 | 2.51% | 252 | 0.04% | 2,422 | 0.41% | 41,861 | 7.05% | 128,200 | 21.58% |
| 5 | 606,306 | 98.55% | 525,147 | 86.61% | 25,024 | 4.13% | 2,593 | 0.43% | 5,494 | 0.91% | 221 | 0.04% | 1,869 | 0.31% | 25,025 | 4.13% | 81,159 | 13.39% |
| 6 | 619,426 | 96.67% | 442,928 | 71.51% | 60,357 | 9.74% | 2,007 | 0.32% | 63,294 | 10.29% | 393 | 0.06% | 3,054 | 0.49% | 26,864 | 4.34% | 176,498 | 28.49% |
| 7 | 611,160 | 96.68% | 501,351 | 82.03% | 35,390 | 5.79% | 2,365 | 0.39% | 19,986 | 3.27% | 349 | 0.06% | 2,311 | 0.38% | 29,147 | 4.77% | 109,809 | 17.97% |
| 8 | 606,395 | 96.79% | 462,281 | 76.27% | 85,460 | 14.09% | 2,719 | 0.45% | 7,135 | 1.18% | 252 | 0.04% | 2,166 | 0.36% | 26,926 | 4.44% | 144,129 | 23.77% |
| 9 | 606,770 | 98.87% | 543,625 | 89.59% | 13,598 | 2.24% | 1,777 | 0.29% | 7,930 | 1.31% | 158 | 0.03% | 1,613 | 0.27% | 19,568 | 3.14% | 63,145 | 10.41% |
| 10 | 609,277 | 97.12% | 469,713 | 75.73% | 76,100 | 12.27% | 1,960 | 0.32% | 36,335 | 5.96% | 223 | 0.04% | 2,232 | 0.38% | 15,848 | 2.56% | 150,559 | 24.27% |
| 11 | 624,965 | 97.27% | 442,233 | 70.86% | 79,258 | 12.70% | 1,810 | 0.29% | 52,682 | 8.47% | 277 | 0.04% | 2,698 | 0.43% | 27,866 | 4.47% | 181,632 | 29.14% |
| 12 | 596,111 | 97.85% | 282,964 | 47.48% | 264,157 | 44.31% | 3,297 | 0.55% | 12,303 | 2.06% | 231 | 0.04% | 3,373 | 0.57% | 17,013 | 2.86% | 313,197 | 52.54% |
| 13 | 592,734 | 97.72% | 234,410 | 39.55% | 267,925 | 45.20% | 3,625 | 0.61% | 17,721 | 2.99% | 282 | 0.05% | 3,382 | 0.56% | 51,978 | 8.77% | 358,324 | 60.45% |

Def. App. 182a

Def. App. 183a

Def. App. 184a

| DISTRICT | Total Population | | | | Racial Demographics as Percent of Total Population | | | | | Voting Age Population | | Racial Demographics as Percent of Voting Pop | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | All Persons | Target | Dev. | Difference | NH White | NH Black | NH Asian | Hispanic | Minority | VAP | % of Total | NH White | NH Black | NH Asian | Hispanic |
| 1 | 270,366 | 265,193 | 1.95% | 5,173 | 38.73% | 34.78% | 0.85% | 19.10% | 61.27% | 201,593 | 74.6% | 42.83% | 35.05% | 0.93% | 16.83% |
| 2 | 260,296 | 265,193 | -1.85% | -4,897 | 61.33% | 24.66% | 1.60% | 8.81% | 38.67% | 188,578 | 72.4% | 61.85% | 24.47% | 1.83% | 7.83% |
| 3 | 268,291 | 265,193 | 1.17% | 3,098 | 39.96% | 42.25% | 10.11% | 2.40% | 60.04% | 212,874 | 79.3% | 41.95% | 42.09% | 9.46% | 2.19% |
| 4 | 259,877 | 265,193 | -2.00% | -5,316 | 74.98% | 14.56% | 2.25% | 6.09% | 25.02% | 214,717 | 82.6% | 74.74% | 13.32% | 2.14% | 4.98% |
| 5 | 260,723 | 265,193 | -1.69% | -4,470 | 62.23% | 19.28% | 9.16% | 3.90% | 37.77% | 205,113 | 78.7% | 65.09% | 18.25% | 8.86% | 3.42% |
| 6 | 269,435 | 265,193 | 1.60% | 4,242 | 44.15% | 39.61% | 5.46% | 2.93% | 55.85% | 205,711 | 76.3% | 48.95% | 39.15% | 5.55% | 2.60% |
| 7 | 258,715 | 265,193 | -2.44% | -6,478 | 39.05% | 45.54% | 4.57% | 7.55% | 60.95% | 208,010 | 80.4% | 40.54% | 44.78% | 4.71% | 6.29% |
| 8 | 267,500 | 265,193 | 0.87% | 2,307 | 47.83% | 40.57% | 1.66% | 2.48% | 52.17% | 206,961 | 77.4% | 52.04% | 40.25% | 1.85% | 2.28% |
| 9 | 260,091 | 265,193 | -1.92% | -5,102 | 71.32% | 4.34% | 17.23% | 3.75% | 28.68% | 206,406 | 79.4% | 73.16% | 4.24% | 16.21% | 3.18% |
| 10 | 260,891 | 265,193 | -1.62% | -4,302 | 47.66% | 44.75% | 4.16% | 2.22% | 52.34% | 207,211 | 79.4% | 50.14% | 40.43% | 3.95% | 1.90% |
| 11 | 267,881 | 265,193 | 1.01% | 2,688 | 66.85% | 20.46% | 2.30% | 2.76% | 33.15% | 204,523 | 76.3% | 72.05% | 19.19% | 2.35% | 2.38% |
| 12 | 270,210 | 265,193 | 1.89% | 5,017 | 75.00% | 12.13% | 1.16% | 2.78% | 25.00% | 207,870 | 76.9% | 81.01% | 11.52% | 1.29% | 2.34% |
| 13 | 258,822 | 265,193 | -2.40% | -6,371 | 73.56% | 8.54% | 13.82% | 3.34% | 26.44% | 213,186 | 82.4% | 73.47% | 8.19% | 12.43% | 2.77% |
| 14 | 262,085 | 265,193 | -1.17% | -3,108 | 82.27% | 6.31% | 5.39% | 4.33% | 17.73% | 218,191 | 83.3% | 80.82% | 5.96% | 5.36% | 3.37% |
| 15 | 260,766 | 265,193 | -1.67% | -4,427 | 68.07% | 14.59% | 8.11% | 6.21% | 31.93% | 221,289 | 84.9% | 68.01% | 13.28% | 8.09% | 5.32% |
| 16 | 262,182 | 265,193 | -1.14% | -3,011 | 89.48% | 2.47% | 0.56% | 5.66% | 10.52% | 213,755 | 81.5% | 88.39% | 2.36% | 0.57% | 4.46% |
| 17 | 266,557 | 265,193 | 0.51% | 1,364 | 84.35% | 4.39% | 0.97% | 6.06% | 15.65% | 209,069 | 78.4% | 85.38% | 4.32% | 1.00% | 4.72% |
| 18 | 268,135 | 265,193 | 1.11% | 2,942 | 83.41% | 4.92% | 1.70% | 4.49% | 16.59% | 205,401 | 76.6% | 85.77% | 4.66% | 1.56% | 3.62% |
| 19 | 262,619 | 265,193 | -0.97% | -2,574 | 76.77% | 11.36% | 2.70% | 5.88% | 23.23% | 213,508 | 80.5% | 77.49% | 10.05% | 2.71% | 4.80% |
| 20 | 262,284 | 265,193 | -1.10% | -2,909 | 75.11% | 9.05% | 2.03% | 8.53% | 24.89% | 200,292 | 76.4% | 78.64% | 8.34% | 1.95% | 6.73% |
| 21 | 271,390 | 265,193 | 2.34% | 6,197 | 68.10% | 11.61% | 2.75% | 8.46% | 31.90% | 205,416 | 75.7% | 73.70% | 11.23% | 2.77% | 7.33% |
| 22 | 264,573 | 265,193 | -0.23% | -620 | 89.50% | 0.65% | 0.78% | 2.86% | 10.50% | 204,483 | 77.3% | 92.17% | 0.65% | 0.83% | 2.37% |
| 23 | 263,780 | 265,193 | -0.53% | -1,413 | 85.17% | 3.66% | 2.70% | 5.03% | 14.83% | 211,880 | 80.3% | 85.65% | 3.52% | 2.62% | 4.05% |
| 24 | 271,211 | 265,193 | 2.27% | 6,018 | 83.91% | 1.69% | 2.41% | 3.77% | 16.09% | 203,066 | 74.9% | 89.06% | 1.70% | 2.44% | 3.24% |
| 25 | 264,345 | 265,193 | -0.32% | -848 | 89.17% | 2.24% | 0.45% | 3.64% | 10.83% | 209,073 | 79.1% | 90.82% | 2.19% | 0.46% | 2.94% |
| 26 | 266,938 | 265,193 | 0.66% | 1,745 | 84.87% | 3.15% | 0.42% | 4.46% | 15.13% | 206,886 | 77.5% | 88.51% | 3.13% | 0.44% | 3.71% |
| 27 | 269,043 | 265,193 | 1.45% | 3,850 | 57.85% | 27.73% | 1.22% | 4.07% | 42.15% | 200,250 | 74.4% | 63.00% | 27.27% | 1.32% | 3.66% |
| 28 | 265,180 | 265,193 | 0.00% | -13 | 78.73% | 4.65% | 5.09% | 5.07% | 21.27% | 210,771 | 79.5% | 81.43% | 4.84% | 5.29% | 4.38% |
| 29 | 263,566 | 265,193 | -0.61% | -1,627 | 55.33% | 16.51% | 4.61% | 18.56% | 44.67% | 200,247 | 76.0% | 60.57% | 15.17% | 4.63% | 15.50% |
| 30 | 264,560 | 265,193 | -0.24% | -633 | 81.65% | 5.68% | 2.38% | 7.62% | 18.35% | 212,420 | 80.3% | 82.52% | 5.06% | 2.30% | 6.18% |
| 31 | 267,918 | 265,193 | 1.03% | 2,725 | 79.46% | 1.50% | 2.85% | 10.84% | 20.54% | 200,843 | 75.0% | 83.32% | 1.41% | 2.92% | 9.22% |
| 32 | 270,401 | 265,193 | 1.96% | 5,208 | 75.58% | 9.07% | 0.52% | 6.01% | 24.42% | 205,945 | 76.2% | 80.98% | 8.80% | 0.55% | 4.92% |
| 33 | 267,378 | 265,193 | 0.82% | 2,185 | 87.59% | 2.51% | 0.43% | 5.12% | 12.41% | 207,138 | 77.5% | 88.65% | 2.99% | 0.43% | 4.33% |
| 34 | 261,805 | 265,193 | -1.28% | -3,388 | 90.54% | 2.22% | 0.72% | 3.76% | 9.46% | 213,991 | 81.7% | 89.33% | 2.34% | 0.72% | 3.01% |
| 35 | 268,708 | 265,193 | 1.33% | 3,515 | 74.07% | 12.21% | 1.54% | 3.75% | 25.93% | 211,487 | 78.7% | 76.93% | 11.30% | 1.55% | 6.32% |
| 36 | 270,486 | 265,193 | 2.00% | 5,293 | 92.65% | 0.35% | 0.36% | 2.03% | 7.35% | 220,106 | 81.4% | 93.79% | 0.30% | 0.37% | 1.55% |
| 37 | 261,707 | 265,193 | -1.31% | -3,486 | 87.54% | 0.73% | 0.55% | 2.45% | 12.46% | 213,146 | 81.4% | 89.30% | 0.75% | 0.57% | 1.95% |
| 38 | 266,616 | 265,193 | 0.54% | 1,423 | 88.14% | 1.65% | 0.69% | 1.74% | 11.86% | 217,404 | 81.5% | 89.52% | 1.90% | 0.72% | 1.43% |

| | |
|---|---|
| Assigned | 10077331 |
| Total Pop | 10077331 |
| Inassign | 0 |

Def. App. 185a

Def. App. 186a

Def. App. 187a

| DISTRICT | POPTOT | Reconstor | POPWH_C | PPopWH_C | POPBL_C | PPopBL_C | POPNA_C | PPopNA_C | POPAS_C | PPopAS_C | POPPI_C | POPPI_C | PPopPI_C | POPOT_C | PPopOT_C | PopNonW | PP.spNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 270,366 | 198.35% | 137,243 | 50.76% | 102,236 | 37.81% | 7,779 | 2.87% | 3,807 | 1.42% | 423 | 0.16% | 41,554 | 15.37% | 133,123 | 49.24% |
| 2 | 260,296 | 197.68% | 179,162 | 68.83% | 69,055 | 26.53% | 3,716 | 1.43% | 7,515 | 2.89% | 282 | 0.11% | 29,564 | 7.90% | 81,134 | 31.17% |
| 3 | 268,291 | 195.28% | 120,706 | 45.01% | 120,106 | 44.77% | 4,386 | 1.63% | 30,498 | 11.37% | 307 | 0.11% | 6,395 | 2.38% | 147,525 | 54.99% |
| 4 | 259,877 | 112.36% | 219,241 | 84.36% | 43,697 | 16.81% | 7,621 | 2.93% | 7,741 | 2.98% | 327 | 0.13% | 13,375 | 5.15% | 40,636 | 15.64% |
| 5 | 260,723 | 197.03% | 189,717 | 69.31% | 56,131 | 21.53% | 5,701 | 2.19% | 26,432 | 10.14% | 298 | 0.10% | 9,800 | 3.76% | 80,006 | 30.69% |
| 6 | 269,435 | 192.03% | 132,600 | 49.21% | 113,079 | 41.97% | 4,615 | 1.71% | 16,551 | 6.14% | 206 | 0.08% | 7,847 | 2.91% | 136,835 | 50.79% |
| 7 | 258,715 | 197.97% | 118,452 | 45.78% | 125,673 | 48.58% | 4,198 | 1.62% | 14,060 | 5.43% | 259 | 0.10% | 16,693 | 6.45% | 140,263 | 54.22% |
| 8 | 267,500 | 191.93% | 140,894 | 52.64% | 113,999 | 42.62% | 3,602 | 1.35% | 7,029 | 2.63% | 279 | 0.10% | 6,954 | 2.60% | 126,696 | 47.36% |
| 9 | 269,091 | 196.63% | 201,104 | 77.32% | 13,825 | 5.32% | 3,293 | 1.27% | 48,340 | 18.59% | 219 | 0.08% | 19,572 | 4.06% | 58,987 | 22.68% |
| 10 | 260,891 | 198.41% | 136,766 | 52.42% | 122,974 | 47.14% | 4,195 | 1.61% | 12,895 | 4.91% | 255 | 0.10% | 5,825 | 2.23% | 124,125 | 47.58% |
| 11 | 267,881 | 193.36% | 195,311 | 72.91% | 69,222 | 22.48% | 5,073 | 1.89% | 8,176 | 3.05% | 246 | 0.09% | 7,841 | 2.93% | 72,570 | 27.09% |
| 12 | 270,210 | 191.47% | 218,637 | 80.91% | 37,207 | 13.77% | 5,176 | 1.92% | 5,217 | 1.93% | 232 | 0.09% | 7,714 | 2.85% | 51,573 | 19.09% |
| 13 | 258,822 | 199.30% | 205,733 | 79.49% | 24,832 | 9.59% | 3,051 | 1.18% | 39,293 | 15.18% | 235 | 0.09% | 9,753 | 3.77% | 53,089 | 20.51% |
| 14 | 262,085 | 111.99% | 237,390 | 90.58% | 22,148 | 8.45% | 5,933 | 2.26% | 17,144 | 6.54% | 266 | 0.10% | 19,621 | 4.05% | 24,695 | 9.42% |
| 15 | 260,769 | 112.72% | 202,023 | 77.47% | 45,364 | 17.40% | 5,569 | 2.14% | 25,921 | 9.94% | 491 | 0.19% | 14,599 | 5.58% | 58,743 | 22.53% |
| 16 | 262,182 | 119.31% | 257,178 | 98.09% | 10,197 | 3.85% | 7,477 | 2.85% | 2,749 | 1.05% | 195 | 0.07% | 11,513 | 4.39% | 5,004 | 1.91% |
| 17 | 266,557 | 198.49% | 245,649 | 92.15% | 16,374 | 6.14% | 7,407 | 2.78% | 4,047 | 1.52% | 354 | 0.13% | 15,129 | 5.68% | 20,917 | 7.85% |
| 18 | 268,135 | 196.62% | 243,555 | 90.83% | 18,217 | 6.79% | 6,909 | 2.58% | 6,091 | 2.27% | 261 | 0.10% | 19,848 | 4.05% | 24,580 | 9.17% |
| 19 | 262,619 | 111.61% | 224,597 | 85.52% | 37,874 | 14.42% | 6,937 | 2.64% | 9,541 | 3.63% | 323 | 0.12% | 13,841 | 5.27% | 38,022 | 14.48% |
| 20 | 262,284 | 197.34% | 219,387 | 83.64% | 28,269 | 10.78% | 7,128 | 2.72% | 6,932 | 2.64% | 334 | 0.13% | 19,482 | 7.43% | 42,897 | 16.36% |
| 21 | 271,390 | 196.02% | 212,854 | 78.43% | 41,296 | 15.18% | 7,218 | 2.66% | 9,337 | 3.44% | 382 | 0.14% | 16,742 | 6.17% | 58,536 | 21.57% |
| 22 | 264,573 | 184.01% | 253,302 | 95.74% | 3,418 | 1.29% | 6,076 | 2.30% | 3,892 | 1.47% | 327 | 0.12% | 8,168 | 3.09% | 11,271 | 4.26% |
| 23 | 263,780 | 198.65% | 245,542 | 93.09% | 12,762 | 4.84% | 5,728 | 2.17% | 9,643 | 3.66% | 195 | 0.07% | 12,715 | 4.82% | 18,238 | 6.91% |
| 24 | 271,211 | 191.79% | 244,772 | 90.25% | 6,691 | 2.47% | 4,839 | 1.78% | 8,844 | 3.26% | 174 | 0.06% | 19,753 | 3.96% | 26,439 | 9.75% |
| 25 | 264,345 | 195.51% | 252,882 | 95.66% | 9,163 | 3.47% | 5,947 | 2.25% | 2,243 | 0.85% | 221 | 0.08% | 8,445 | 3.19% | 11,463 | 4.34% |
| 26 | 266,938 | 193.74% | 245,988 | 92.15% | 11,309 | 4.24% | 6,969 | 2.61% | 2,155 | 0.81% | 211 | 0.08% | 19,263 | 3.84% | 20,950 | 7.85% |
| 27 | 269,043 | 193.35% | 175,192 | 65.12% | 82,484 | 30.66% | 6,643 | 2.47% | 4,668 | 1.74% | 279 | 0.10% | 8,811 | 3.27% | 93,851 | 34.88% |
| 28 | 265,180 | 195.03% | 228,870 | 86.31% | 16,597 | 6.26% | 6,437 | 2.95% | 16,941 | 6.05% | 337 | 0.13% | 11,233 | 4.24% | 36,310 | 13.69% |
| 29 | 263,566 | 199.87% | 175,759 | 66.68% | 52,712 | 20.00% | 6,459 | 2.45% | 14,616 | 5.55% | 354 | 0.13% | 39,677 | 15.06% | 87,816 | 33.32% |
| 30 | 264,560 | 199.77% | 238,166 | 90.02% | 20,478 | 7.74% | 5,738 | 2.17% | 8,856 | 3.35% | 383 | 0.14% | 16,798 | 6.35% | 26,394 | 9.98% |
| 31 | 267,918 | 196.21% | 238,222 | 88.92% | 7,625 | 2.85% | 5,191 | 1.94% | 10,239 | 3.82% | 358 | 0.13% | 22,928 | 8.56% | 29,696 | 11.08% |
| 32 | 270,401 | 193.70% | 226,736 | 83.85% | 29,029 | 10.73% | 8,516 | 3.15% | 2,699 | 1.00% | 293 | 0.11% | 13,150 | 4.86% | 43,665 | 16.15% |
| 33 | 267,378 | 195.54% | 253,457 | 94.79% | 9,108 | 3.41% | 5,941 | 2.22% | 2,383 | 0.89% | 316 | 0.12% | 19,974 | 4.10% | 13,921 | 5.21% |
| 34 | 261,895 | 198.04% | 254,011 | 97.02% | 8,463 | 3.23% | 9,055 | 3.46% | 2,907 | 1.12% | 242 | 0.09% | 8,164 | 3.12% | 7,794 | 2.98% |
| 35 | 268,708 | 197.88% | 223,747 | 83.27% | 39,341 | 14.64% | 5,981 | 2.23% | 5,578 | 2.08% | 326 | 0.12% | 14,909 | 5.55% | 44,961 | 16.73% |
| 36 | 270,499 | 194.85% | 264,822 | 97.91% | 2,637 | 1.09% | 7,302 | 2.70% | 2,066 | 0.76% | 315 | 0.12% | 6,406 | 2.37% | 5,664 | 2.09% |
| 37 | 261,707 | 196.13% | 246,129 | 94.05% | 3,606 | 1.36% | 17,606 | 6.73% | 2,783 | 1.06% | 444 | 0.17% | 7,091 | 2.71% | 15,578 | 5.95% |
| 38 | 266,616 | 195.52% | 250,370 | 93.91% | 6,129 | 2.30% | 16,131 | 6.05% | 3,983 | 1.16% | 366 | 0.14% | 5,208 | 1.98% | 16,246 | 6.09% |

2022 10:30:25 PM

Def. App. 188a

| DISTRICT | POPTOT | Pct | POPHNH_C | PctHNH_C | POPHNHEL_C | PctHNHEL_C | POPHNHBA_C | PctHNHBA_C | POPHNHAS_C | PctHNHAS_C | POPHNHPI_C | PctHNHPI_C | POPHNHOT | PctHNHOT | POPHESP | PctHisp | PopHonW | PctHonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | | | | | | | | | | | | | | | | 155,752 | 57.61% |
| 2 | | | | | | | | | | | | | | | | | 91,524 | 35.16% |
| 3 | | | | | | | | | | | | | | | | | 151,301 | 56.39% |
| 4 | | | | | | | | | | | | | | | | | 51,986 | 20.00% |
| 5 | | | | | | | | | | | | | | | | | 87,101 | 33.61% |
| 6 | | | | | | | | | | | | | | | | | 141,760 | 52.61% |
| 7 | | | | | | | | | | | | | | | | | 149,428 | 57.76% |
| 8 | | | | | | | | | | | | | | | | | 131,244 | 49.08% |
| 9 | | | | | | | | | | | | | | | | | 65,546 | 25.20% |
| 10 | | | | | | | | | | | | | | | | | 127,739 | 48.98% |
| 11 | | | | | | | | | | | | | | | | | 77,693 | 29.00% |
| 12 | | | | | | | | | | | | | | | | | 57,044 | 21.11% |
| 13 | | | | | | | | | | | | | | | | | 59,469 | 22.98% |
| 14 | | | | | | | | | | | | | | | | | 32,841 | 12.53% |
| 15 | | | | | | | | | | | | | | | | | 68,980 | 26.45% |
| 16 | | | | | | | | | | | | | | | | | 15,733 | 6.09% |
| 17 | | | | | | | | | | | | | | | | | 29,431 | 11.04% |
| 18 | | | | | | | | | | | | | | | | | 32,267 | 12.03% |
| 19 | | | | | | | | | | | | | | | | | 46,675 | 17.77% |
| 20 | | | | | | | | | | | | | | | | | 54,736 | 20.68% |
| 21 | | | | | | | | | | | | | | | | | 72,912 | 26.87% |
| 22 | | | | | | | | | | | | | | | | | 17,369 | 6.54% |
| 23 | | | | | | | | | | | | | | | | | 27,822 | 10.62% |
| 24 | | | | | | | | | | | | | | | | | 33,735 | 12.44% |
| 25 | | | | | | | | | | | | | | | | | 18,454 | 6.99% |
| 26 | | | | | | | | | | | | | | | | | 29,361 | 11.00% |
| 27 | | | | | | | | | | | | | | | | | 101,073 | 37.57% |
| 28 | | | | | | | | | | | | | | | | | 45,469 | 17.15% |
| 29 | | | | | | | | | | | | | | | | | 107,153 | 40.08% |
| 30 | | | | | | | | | | | | | | | | | 37,113 | 14.03% |
| 31 | | | | | | | | | | | | | | | | | 45,799 | 17.09% |
| 32 | | | | | | | | | | | | | | | | | 54,517 | 20.01% |
| 33 | | | | | | | | | | | | | | | | | 23,344 | 8.73% |
| 34 | | | | | | | | | | | | | | | | | 14,638 | 5.59% |
| 35 | | | | | | | | | | | | | | | | | 58,566 | 21.81% |
| 36 | | | | | | | | | | | | | | | | | 9,832 | 3.63% |
| 37 | | | | | | | | | | | | | | | | | 20,103 | 7.68% |
| 38 | | | | | | | | | | | | | | | | | 19,793 | 7.42% |

Def. App. 189a

| DISTRICT | POPTOT | PPopWH | POPWH_A | PPopWH_A | POPBL_W | PPopBL_W | POPNH_W | PPopNH_W | POPAS_W | PPopAS_W | POPPI_W | PPopPI_W | POPOT_W | PPopOT_W | PopNonW | PPopNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 270,266 | 91.13% | 114,759 | 42.45% | 97,059 | 35.95% | 3,418 | 1.26% | 2,473 | 0.91% | 216 | 0.08% | 28,272 | 10.46% | 155,607 | 57.55% |
| 2 | 260,296 | 95.47% | 163,735 | 62.95% | 66,010 | 25.36% | 1,642 | 0.63% | 4,495 | 1.69% | 121 | 0.05% | 12,591 | 4.84% | 96,561 | 37.10% |
| 3 | 268,291 | 99.02% | 108,945 | 40.61% | 115,681 | 43.12% | 1,758 | 0.66% | 27,702 | 10.33% | 165 | 0.06% | 3,311 | 1.26% | 159,346 | 59.39% |
| 4 | 259,877 | 98.94% | 199,788 | 76.88% | 39,271 | 15.11% | 1,692 | 0.65% | 6,135 | 2.36% | 142 | 0.05% | 4,601 | 1.89% | 60,089 | 23.12% |
| 5 | 266,723 | 94.57% | 165,630 | 63.34% | 51,828 | 19.88% | 1,566 | 0.60% | 24,263 | 9.31% | 133 | 0.05% | 3,748 | 1.44% | 95,693 | 36.70% |
| 6 | 269,435 | 92.80% | 120,763 | 44.82% | 109,022 | 40.46% | 1,681 | 0.62% | 14,900 | 5.53% | 109 | 0.04% | 3,573 | 1.33% | 148,672 | 55.18% |
| 7 | 258,715 | 96.86% | 104,761 | 40.49% | 120,802 | 46.73% | 1,906 | 0.74% | 12,356 | 4.78% | 165 | 0.06% | 10,516 | 4.06% | 153,954 | 59.51% |
| 8 | 267,500 | 93.18% | 129,657 | 48.47% | 110,550 | 41.33% | 1,355 | 0.51% | 4,823 | 1.80% | 171 | 0.06% | 2,701 | 1.01% | 137,843 | 51.53% |
| 9 | 260,991 | 95.78% | 187,337 | 72.03% | 11,948 | 4.59% | 842 | 0.32% | 45,159 | 17.36% | 92 | 0.04% | 3,743 | 1.44% | 72,754 | 27.91% |
| 10 | 260,881 | 99.66% | 125,826 | 48.23% | 118,815 | 45.54% | 1,441 | 0.55% | 11,209 | 4.30% | 118 | 0.05% | 2,595 | 0.99% | 135,065 | 51.77% |
| 11 | 267,881 | 92.37% | 181,037 | 67.58% | 56,044 | 20.92% | 1,097 | 0.41% | 6,447 | 2.41% | 120 | 0.04% | 2,710 | 1.01% | 86,844 | 32.42% |
| 12 | 270,318 | 98.94% | 204,815 | 75.89% | 33,795 | 12.51% | 1,072 | 0.40% | 3,410 | 1.26% | 118 | 0.04% | 2,507 | 0.93% | 65,395 | 24.20% |
| 13 | 258,822 | 98.60% | 192,363 | 74.38% | 22,828 | 8.82% | 723 | 0.28% | 36,131 | 13.96% | 124 | 0.05% | 3,126 | 1.21% | 66,559 | 25.72% |
| 14 | 262,085 | 97.69% | 219,226 | 83.65% | 17,498 | 6.68% | 1,246 | 0.48% | 14,159 | 5.40% | 189 | 0.06% | 3,749 | 1.43% | 42,859 | 16.35% |
| 15 | 260,798 | 94.52% | 181,788 | 69.71% | 39,777 | 15.25% | 1,509 | 0.58% | 21,624 | 8.29% | 284 | 0.11% | 6,710 | 2.57% | 78,978 | 30.29% |
| 16 | 262,982 | 97.15% | 240,369 | 91.46% | 7,065 | 2.69% | 1,272 | 0.49% | 1,592 | 0.61% | 87 | 0.03% | 4,391 | 1.67% | 21,873 | 8.34% |
| 17 | 266,557 | 95.28% | 228,662 | 85.78% | 12,412 | 4.66% | 1,907 | 0.72% | 2,772 | 1.04% | 173 | 0.06% | 8,059 | 3.02% | 37,895 | 14.22% |
| 18 | 268,135 | 94.29% | 227,428 | 84.82% | 13,822 | 5.15% | 1,800 | 0.67% | 4,722 | 1.76% | 82 | 0.03% | 4,880 | 1.82% | 40,707 | 15.18% |
| 19 | 262,619 | 94.48% | 205,399 | 78.21% | 31,488 | 11.98% | 1,862 | 0.71% | 7,362 | 2.80% | 137 | 0.05% | 7,138 | 2.72% | 57,220 | 21.79% |
| 20 | 262,284 | 93.66% | 201,975 | 77.01% | 24,708 | 9.42% | 2,326 | 0.89% | 5,585 | 2.10% | 142 | 0.06% | 11,021 | 4.20% | 60,309 | 22.99% |
| 21 | 271,390 | 89.73% | 191,558 | 70.59% | 33,836 | 12.47% | 2,023 | 0.75% | 7,783 | 2.87% | 169 | 0.06% | 8,159 | 3.01% | 79,832 | 29.42% |
| 22 | 264,573 | 93.16% | 239,227 | 90.42% | 1,909 | 0.72% | 913 | 0.35% | 2,221 | 0.84% | 182 | 0.07% | 2,026 | 0.77% | 25,346 | 9.58% |
| 23 | 263,780 | 95.38% | 228,440 | 86.60% | 10,284 | 3.90% | 1,056 | 0.40% | 7,345 | 2.78% | 94 | 0.04% | 4,360 | 1.65% | 35,340 | 13.40% |
| 24 | 271,711 | 90.73% | 230,099 | 84.84% | 5,007 | 1.85% | 748 | 0.28% | 6,741 | 2.49% | 81 | 0.03% | 3,378 | 1.25% | 41,112 | 15.16% |
| 25 | 264,345 | 94.99% | 239,323 | 90.53% | 6,399 | 2.41% | 1,183 | 0.45% | 1,289 | 0.49% | 113 | 0.04% | 2,840 | 1.07% | 25,022 | 9.47% |
| 26 | 266,938 | 92.17% | 230,863 | 86.49% | 8,897 | 3.33% | 1,284 | 0.48% | 1,232 | 0.46% | 65 | 0.03% | 3,673 | 1.38% | 36,075 | 13.51% |
| 27 | 269,043 | 91.21% | 159,403 | 59.25% | 76,526 | 28.44% | 1,902 | 0.71% | 3,498 | 1.30% | 144 | 0.05% | 3,928 | 1.46% | 109,640 | 40.75% |
| 28 | 265,180 | 92.80% | 213,118 | 80.37% | 13,058 | 4.92% | 1,239 | 0.47% | 13,746 | 5.18% | 171 | 0.06% | 4,744 | 1.79% | 52,062 | 19.63% |
| 29 | 263,566 | 92.62% | 153,791 | 58.35% | 46,770 | 17.75% | 3,122 | 1.18% | 12,612 | 4.79% | 189 | 0.07% | 27,443 | 10.49% | 109,775 | 41.65% |
| 30 | 264,560 | 96.25% | 220,974 | 83.53% | 16,190 | 6.12% | 1,634 | 0.62% | 6,581 | 2.48% | 171 | 0.06% | 9,377 | 3.54% | 43,596 | 16.47% |
| 31 | 267,018 | 92.17% | 219,847 | 82.06% | 4,949 | 1.85% | 1,596 | 0.60% | 8,044 | 3.00% | 169 | 0.06% | 12,331 | 4.60% | 48,071 | 17.94% |
| 32 | 270,401 | 98.80% | 209,763 | 77.57% | 25,346 | 9.37% | 2,853 | 1.06% | 1,579 | 0.58% | 133 | 0.05% | 5,858 | 2.17% | 60,638 | 22.43% |
| 33 | 267,278 | 94.93% | 239,582 | 89.60% | 7,067 | 2.64% | 1,284 | 0.48% | 1,284 | 0.47% | 154 | 0.06% | 4,459 | 1.67% | 27,796 | 10.40% |
| 34 | 261,805 | 97.67% | 240,986 | 92.05% | 6,199 | 2.37% | 3,598 | 1.37% | 2,053 | 0.78% | 135 | 0.05% | 3,126 | 1.19% | 20,819 | 7.95% |
| 35 | 268,708 | 94.33% | 206,032 | 76.68% | 34,554 | 12.86% | 1,494 | 0.56% | 4,316 | 1.61% | 191 | 0.07% | 6,880 | 2.56% | 62,676 | 23.32% |
| 36 | 270,686 | 95.71% | 252,817 | 93.47% | 1,171 | 0.43% | 1,781 | 0.66% | 1,195 | 0.44% | 114 | 0.04% | 1,804 | 0.67% | 17,669 | 6.53% |
| 37 | 261,707 | 94.46% | 231,238 | 88.34% | 2,158 | 0.82% | 9,604 | 3.67% | 1,711 | 0.65% | 219 | 0.08% | 2,282 | 0.87% | 30,469 | 11.64% |
| 38 | 266,614 | 95.07% | 236,793 | 88.81% | 4,677 | 1.75% | 8,349 | 3.13% | 1,977 | 0.74% | 162 | 0.06% | 1,502 | 0.56% | 29,823 | 11.19% |

Def. App. 190a

Def. App. 191a

| DISTRICT | POPTOT | Persons(w) | POPNRM1_A | POPNRM1H | POPNRBL_W | Pop(BES) | POPNRBA_W | Pop(BBA) | POPNRAS_W | Pop(AS) | POPNRP_W | Pop(RP) | POPNRB1_W | POPNRBOT_W | POPNRNH_W | POPNRBP | Pop(spHsp) | Pop(totW) | PPHspNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| DISTRICT | VAPTOT | Personmm | VAPWH_A | PVAPWH_A | VAPBL_A | PVAPBL_A | VAPNA_A | PVAPNA_A | VAPAS_A | PVAPAS_A | VAMPI_A | PVAMPI_A | VAPTOT_A | PVAPTOT_A | VAPXX | PVAPXX | PctHispmW | PPHispmW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 201,503 | 100.00% | | | | | | | | | | | | | | | | 54.06% |
| 2 | | 100.00% | | | | | | | | | | | | | | | | 36.80% |
| 3 | | 100.00% | | | | | | | | | | | | | | | | 57.44% |

Def. App. 192a

Def. App. 193a

| DISTRICT | VAPTOT | Percentile | VAPWHI_C | PVAPWHI_C | VAPBL_C | PVAPBL_C | VAPNA_C | PVAPNA_C | VAPAS_C | PVAPAS_C | VAPPI_C | PVAPPI_C | VAPOT_C | PVAPOT_C | PopNonW | PP_PopNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 201,593 | 108.69% | 107,284 | 53.22% | 74,963 | 37.29% | 5,705 | 2.83% | 2,817 | 1.40% | 269 | 0.13% | 27,829 | 13.80% | 94,309 | 46.78% |
| 2 | 188,578 | 106.93% | 129,036 | 68.43% | 48,969 | 25.91% | 2,741 | 1.45% | 5,484 | 2.91% | 183 | 0.09% | 13,631 | 7.23% | 59,542 | 31.57% |
| 3 | 212,874 | 104.73% | 98,545 | 46.29% | 93,904 | 44.11% | 3,367 | 1.63% | 22,233 | 10.44% | 296 | 0.00% | 4,665 | 2.19% | 114,329 | 53.71% |
| 4 | 214,717 | 106.60% | 176,148 | 82.04% | 31,452 | 14.65% | 5,772 | 2.69% | 5,588 | 2.66% | 224 | 0.00% | 9,796 | 4.52% | 38,569 | 17.96% |
| 5 | 205,513 | 105.54% | 145,132 | 70.74% | 40,374 | 19.68% | 4,269 | 2.08% | 19,491 | 9.90% | 185 | 0.09% | 7,032 | 3.43% | 59,981 | 29.24% |
| 6 | 205,711 | 104.61% | 109,369 | 53.16% | 84,532 | 40.99% | 3,363 | 1.63% | 12,475 | 6.06% | 135 | 0.07% | 5,720 | 2.78% | 96,351 | 46.84% |
| 7 | 208,010 | 105.34% | 95,389 | 45.86% | 97,859 | 47.05% | 3,216 | 1.55% | 10,976 | 5.28% | 290 | 0.05% | 11,482 | 5.52% | 112,521 | 54.14% |
| 8 | 206,961 | 104.36% | 116,136 | 56.11% | 86,743 | 41.91% | 2,727 | 1.32% | 5,134 | 2.48% | 197 | 0.10% | 5,950 | 2.44% | 99,805 | 43.89% |
| 9 | 209,406 | 104.52% | 160,736 | 77.87% | 9,985 | 4.84% | 2,365 | 1.15% | 35,254 | 17.08% | 141 | 0.07% | 7,246 | 3.51% | 45,670 | 22.13% |
| 10 | 207,211 | 104.84% | 111,656 | 53.89% | 87,144 | 42.06% | 3,118 | 1.50% | 9,352 | 4.51% | 184 | 0.09% | 4,132 | 1.99% | 95,555 | 46.11% |
| 11 | 204,523 | 104.83% | 157,342 | 76.93% | 41,849 | 20.46% | 3,789 | 1.85% | 5,794 | 2.83% | 170 | 0.08% | 5,462 | 2.67% | 47,181 | 23.61% |
| 12 | 207,870 | 104.50% | 178,257 | 85.75% | 26,028 | 12.52% | 3,712 | 1.79% | 3,727 | 1.79% | 155 | 0.07% | 5,354 | 2.58% | 29,613 | 14.25% |
| 13 | 213,186 | 104.25% | 166,129 | 77.93% | 18,919 | 8.87% | 2,211 | 1.04% | 28,129 | 13.19% | 154 | 0.07% | 6,924 | 3.25% | 47,957 | 22.07% |
| 14 | 218,191 | 105.58% | 189,643 | 86.92% | 15,364 | 7.04% | 4,375 | 2.01% | 13,448 | 6.16% | 217 | 0.10% | 7,267 | 3.33% | 28,548 | 13.08% |
| 15 | 221,289 | 106.97% | 167,053 | 75.49% | 33,632 | 15.20% | 4,213 | 1.90% | 20,729 | 9.37% | 364 | 0.16% | 10,712 | 4.84% | 54,236 | 24.51% |
| 16 | 213,755 | 105.34% | 203,079 | 95.00% | 6,455 | 3.02% | 5,522 | 2.58% | 1,861 | 0.87% | 130 | 0.06% | 8,140 | 3.81% | 19,685 | 5.06% |
| 17 | 209,069 | 105.38% | 199,964 | 91.34% | 11,005 | 5.26% | 5,244 | 2.51% | 2,886 | 1.38% | 215 | 0.10% | 10,086 | 4.79% | 18,195 | 8.64% |
| 18 | 205,401 | 105.85% | 187,847 | 91.45% | 11,698 | 5.65% | 4,889 | 2.38% | 3,844 | 1.87% | 164 | 0.08% | 7,339 | 3.57% | 17,554 | 8.55% |
| 19 | 211,508 | 106.66% | 177,589 | 83.96% | 24,809 | 11.73% | 5,026 | 2.38% | 7,000 | 3.31% | 214 | 0.10% | 9,699 | 4.59% | 33,928 | 16.04% |
| 20 | 200,292 | 105.70% | 170,595 | 85.17% | 18,663 | 9.32% | 4,977 | 2.48% | 4,696 | 2.31% | 219 | 0.11% | 12,619 | 6.30% | 29,697 | 14.83% |
| 21 | 205,416 | 107.13% | 168,375 | 81.97% | 27,338 | 13.31% | 5,300 | 2.95% | 6,684 | 3.25% | 261 | 0.13% | 12,193 | 5.89% | 37,041 | 18.03% |
| 22 | 204,483 | 104.69% | 199,089 | 97.36% | 2,067 | 1.01% | 4,530 | 2.22% | 2,592 | 1.27% | 213 | 0.10% | 5,598 | 2.74% | 5,403 | 2.64% |
| 23 | 211,880 | 105.38% | 194,749 | 91.91% | 8,897 | 4.20% | 4,284 | 2.02% | 6,771 | 3.20% | 157 | 0.07% | 8,754 | 4.13% | 17,131 | 8.09% |
| 24 | 203,666 | 104.96% | 191,644 | 94.38% | 4,423 | 2.18% | 3,479 | 1.71% | 6,061 | 2.98% | 114 | 0.06% | 7,295 | 3.59% | 11,422 | 5.62% |
| 25 | 209,073 | 104.21% | 200,242 | 95.78% | 5,774 | 2.76% | 4,195 | 2.01% | 1,509 | 0.72% | 135 | 0.06% | 6,027 | 2.88% | 8,831 | 4.22% |
| 26 | 206,888 | 105.17% | 195,616 | 94.55% | 7,712 | 3.73% | 5,194 | 2.51% | 1,429 | 0.69% | 134 | 0.06% | 7,397 | 3.58% | 11,270 | 5.45% |
| 27 | 200,250 | 105.55% | 138,136 | 68.98% | 58,223 | 29.08% | 5,099 | 2.59% | 3,429 | 1.71% | 179 | 0.09% | 6,380 | 3.19% | 62,114 | 31.07% |
| 28 | 210,771 | 105.15% | 184,437 | 87.51% | 12,181 | 5.78% | 3,989 | 1.89% | 12,549 | 5.95% | 254 | 0.12% | 8,224 | 3.90% | 26,334 | 12.49% |
| 29 | 200,247 | 107.67% | 139,166 | 69.50% | 35,114 | 17.54% | 4,556 | 2.28% | 10,524 | 5.26% | 235 | 0.12% | 26,005 | 12.99% | 61,981 | 30.50% |
| 30 | 212,420 | 105.36% | 188,598 | 88.79% | 13,192 | 6.21% | 4,031 | 1.90% | 6,180 | 2.91% | 254 | 0.12% | 11,544 | 5.43% | 23,822 | 11.31% |
| 31 | 200,843 | 105.80% | 182,247 | 90.74% | 4,219 | 2.10% | 3,491 | 1.74% | 6,855 | 3.41% | 237 | 0.12% | 15,441 | 7.68% | 18,596 | 9.26% |
| 32 | 205,945 | 105.46% | 180,306 | 87.55% | 19,918 | 9.67% | 6,063 | 2.94% | 1,796 | 0.87% | 165 | 0.08% | 8,933 | 4.34% | 25,639 | 12.45% |
| 33 | 207,138 | 104.36% | 156,735 | 94.44% | 7,233 | 3.48% | 4,219 | 2.04% | 1,441 | 0.70% | 195 | 0.09% | 7,337 | 3.54% | 11,483 | 5.51% |
| 34 | 213,991 | 104.44% | 202,375 | 94.57% | 6,281 | 2.94% | 6,513 | 3.04% | 2,161 | 1.01% | 139 | 0.06% | 6,013 | 2.81% | 11,616 | 5.43% |
| 35 | 211,487 | 105.47% | 177,577 | 83.97% | 26,564 | 12.56% | 4,286 | 2.03% | 4,098 | 1.96% | 291 | 0.13% | 10,434 | 4.93% | 33,910 | 16.03% |
| 36 | 220,104 | 103.89% | 215,859 | 98.07% | 1,414 | 0.64% | 5,437 | 2.47% | 1,361 | 0.62% | 189 | 0.09% | 4,627 | 2.10% | 4,247 | 1.93% |
| 37 | 213,144 | 104.87% | 201,432 | 94.50% | 2,495 | 1.17% | 12,579 | 5.81% | 1,853 | 0.87% | 291 | 0.14% | 5,162 | 2.42% | 11,714 | 5.50% |
| 38 | 217,404 | 104.25% | 204,668 | 94.14% | 4,882 | 2.25% | 19,953 | 9.04% | 2,315 | 1.06% | 296 | 0.09% | 3,838 | 1.77% | 12,736 | 5.86% |

Def. App. 194a

Def. App. 195a

| DISTRICT | VAPTOT | Percentor | VAPWH_A | PVAPWH_A | VAPBL_W | PVAPBL_W | VAPNA_W | PVAPNA_W | VAPAS_W | PVAPAS_W | VAPPL_W | PVAPPL_W | VAPOT_W | PVAPOT_W | PopNonW | PPopNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 201,563 | 93.51% | 92,620 | 45.94% | 72,474 | 35.95% | 2,533 | 1.26% | 2,098 | 1.04% | 152 | 0.08% | 18,630 | 9.24% | 108,973 | 54.06% |
| 2 | 188,578 | 95.27% | 119,179 | 63.20% | 47,317 | 25.09% | 1,237 | 0.66% | 3,611 | 1.91% | 93 | 0.05% | 8,219 | 4.36% | 69,399 | 36.80% |
| 3 | 212,874 | 94.93% | 90,601 | 42.56% | 91,246 | 42.86% | 1,378 | 0.65% | 20,504 | 9.63% | 123 | 0.06% | 2,483 | 1.17% | 122,273 | 57.44% |
| 4 | 214,717 | 94.50% | 163,496 | 76.14% | 29,574 | 13.77% | 1,361 | 0.63% | 4,794 | 2.23% | 105 | 0.05% | 3,585 | 1.67% | 51,221 | 23.86% |
| 5 | 205,113 | 95.70% | 135,360 | 65.99% | 38,456 | 18.75% | 1,226 | 0.60% | 18,445 | 8.99% | 97 | 0.05% | 2,718 | 1.33% | 69,753 | 34.01% |
| 6 | 205,711 | 96.69% | 101,888 | 49.53% | 82,057 | 39.89% | 1,264 | 0.61% | 11,642 | 5.66% | 74 | 0.04% | 2,604 | 1.27% | 103,823 | 50.47% |
| 7 | 208,010 | 96.63% | 86,759 | 41.71% | 95,172 | 45.75% | 1,559 | 0.75% | 10,127 | 4.87% | 131 | 0.06% | 7,257 | 3.49% | 121,251 | 58.29% |
| 8 | 206,961 | 97.08% | 108,963 | 52.64% | 84,702 | 40.93% | 1,056 | 0.51% | 4,075 | 1.97% | 125 | 0.06% | 2,017 | 0.97% | 98,008 | 47.36% |
| 9 | 206,408 | 96.69% | 152,225 | 73.75% | 9,160 | 4.44% | 563 | 0.27% | 33,688 | 16.32% | 76 | 0.04% | 2,633 | 1.28% | 54,181 | 26.25% |
| 10 | 207,211 | 97.24% | 104,897 | 50.63% | 85,132 | 41.08% | 1,107 | 0.53% | 8,428 | 4.07% | 91 | 0.04% | 1,833 | 0.88% | 102,314 | 49.38% |
| 11 | 204,523 | 96.68% | 148,634 | 72.67% | 40,054 | 19.58% | 867 | 0.42% | 4,994 | 2.44% | 101 | 0.05% | 1,854 | 0.91% | 55,889 | 27.33% |
| 12 | 207,870 | 96.19% | 169,806 | 81.69% | 24,568 | 11.82% | 858 | 0.41% | 2,860 | 1.38% | 75 | 0.04% | 1,775 | 0.85% | 38,064 | 18.31% |
| 13 | 213,166 | 96.37% | 157,849 | 74.64% | 17,963 | 8.43% | 550 | 0.26% | 26,736 | 12.54% | 88 | 0.04% | 2,272 | 1.07% | 55,337 | 25.96% |
| 14 | 218,191 | 95.25% | 178,730 | 81.91% | 13,554 | 6.21% | 968 | 0.44% | 11,889 | 5.45% | 137 | 0.06% | 2,551 | 1.17% | 39,461 | 18.09% |
| 15 | 221,269 | 94.47% | 153,722 | 69.47% | 30,614 | 13.83% | 1,188 | 0.54% | 18,264 | 8.25% | 244 | 0.11% | 4,991 | 2.26% | 67,567 | 30.53% |
| 16 | 213,755 | 95.69% | 192,319 | 89.97% | 5,357 | 2.51% | 1,014 | 0.47% | 1,268 | 0.59% | 61 | 0.03% | 3,234 | 1.51% | 21,436 | 10.03% |
| 17 | 209,069 | 95.39% | 180,693 | 86.43% | 9,469 | 4.53% | 1,399 | 0.67% | 2,266 | 1.08% | 116 | 0.04% | 5,288 | 2.53% | 28,376 | 13.57% |
| 18 | 205,401 | 96.55% | 178,340 | 86.83% | 9,954 | 4.85% | 1,268 | 0.62% | 3,313 | 1.61% | 61 | 0.03% | 3,324 | 1.62% | 27,061 | 13.17% |
| 19 | 211,598 | 95.82% | 166,300 | 78.63% | 22,122 | 10.46% | 1,406 | 0.66% | 5,930 | 2.80% | 108 | 0.05% | 5,131 | 2.43% | 45,208 | 21.37% |
| 20 | 200,292 | 95.10% | 160,236 | 80.00% | 17,260 | 8.62% | 1,685 | 0.84% | 4,031 | 2.01% | 123 | 0.06% | 7,137 | 3.56% | 40,056 | 20.00% |
| 21 | 205,416 | 94.24% | 155,578 | 75.74% | 24,364 | 11.86% | 1,612 | 0.78% | 5,855 | 2.85% | 140 | 0.07% | 6,035 | 2.94% | 49,838 | 24.26% |
| 22 | 204,483 | 95.65% | 189,992 | 92.91% | 1,445 | 0.71% | 738 | 0.36% | 1,807 | 0.88% | 138 | 0.07% | 1,465 | 0.72% | 14,491 | 7.09% |
| 23 | 211,890 | 95.01% | 183,813 | 86.75% | 7,845 | 3.70% | 821 | 0.39% | 5,699 | 2.69% | 84 | 0.04% | 3,036 | 1.43% | 28,067 | 13.25% |
| 24 | 203,066 | 95.58% | 182,390 | 89.83% | 3,714 | 1.83% | 964 | 0.28% | 5,069 | 2.50% | 56 | 0.03% | 2,305 | 1.14% | 20,676 | 10.18% |
| 25 | 209,073 | 96.13% | 191,959 | 91.81% | 4,835 | 2.31% | 926 | 0.44% | 1,028 | 0.49% | 71 | 0.03% | 2,171 | 1.04% | 17,115 | 8.19% |
| 26 | 206,886 | 95.29% | 185,606 | 89.71% | 6,745 | 3.26% | 1,009 | 0.49% | 978 | 0.47% | 64 | 0.03% | 2,734 | 1.32% | 21,280 | 10.29% |
| 27 | 200,250 | 95.10% | 128,596 | 64.22% | 55,786 | 27.86% | 1,537 | 0.77% | 2,796 | 1.40% | 95 | 0.05% | 2,823 | 1.41% | 71,654 | 35.78% |
| 28 | 210,771 | 95.45% | 174,475 | 82.78% | 10,614 | 5.04% | 964 | 0.46% | 11,317 | 5.37% | 133 | 0.06% | 3,685 | 1.75% | 36,296 | 17.22% |
| 29 | 200,247 | 94.20% | 126,054 | 62.95% | 32,616 | 16.29% | 2,223 | 1.11% | 9,531 | 4.76% | 140 | 0.07% | 18,065 | 9.02% | 74,193 | 37.05% |
| 30 | 212,420 | 95.45% | 178,373 | 83.97% | 11,370 | 5.35% | 1,231 | 0.58% | 5,050 | 2.38% | 130 | 0.06% | 6,593 | 3.10% | 34,047 | 16.03% |
| 31 | 200,843 | 94.89% | 171,463 | 85.37% | 3,210 | 1.60% | 1,150 | 0.57% | 6,031 | 3.00% | 117 | 0.06% | 8,535 | 4.25% | 29,380 | 14.63% |
| 32 | 205,945 | 95.18% | 169,962 | 82.53% | 18,562 | 9.01% | 2,196 | 1.07% | 1,232 | 0.60% | 83 | 0.04% | 3,985 | 1.93% | 35,083 | 17.47% |
| 33 | 207,138 | 96.60% | 187,252 | 90.40% | 6,446 | 3.11% | 1,013 | 0.49% | 971 | 0.47% | 110 | 0.05% | 3,064 | 1.48% | 19,886 | 9.60% |
| 34 | 213,991 | 96.01% | 193,584 | 90.46% | 5,220 | 2.44% | 2,652 | 1.24% | 1,667 | 0.78% | 79 | 0.04% | 2,261 | 1.06% | 20,407 | 9.54% |
| 35 | 211,487 | 95.32% | 166,986 | 78.96% | 24,705 | 11.69% | 1,312 | 0.53% | 3,395 | 1.61% | 126 | 0.04% | 5,053 | 2.39% | 44,501 | 21.04% |
| 36 | 220,106 | 96.47% | 207,343 | 94.38% | 779 | 0.35% | 1,394 | 0.63% | 930 | 0.42% | 78 | 0.04% | 1,312 | 0.60% | 12,363 | 5.62% |
| 37 | 213,146 | 95.53% | 191,653 | 89.92% | 1,763 | 0.83% | 7,001 | 3.28% | 1,328 | 0.62% | 181 | 0.08% | 1,696 | 0.80% | 21,493 | 10.08% |
| 38 | 217,464 | 94.84% | 195,824 | 90.07% | 4,284 | 1.97% | 5,804 | 2.67% | 1,648 | 0.76% | 103 | 0.05% | 1,125 | 0.52% | 21,580 | 9.93% |

Def. App. 196a

Def. App. 197a

2022 10:36:25 PM

Def. App. 198a

Def. App. 199a

| DISTRICT | Total Population | | | | Racial Demographics as Percent of Total Population | | | | | Voting Age Population | | Racial Demographics as Percent of Voting Population | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | AC Percent | Target | zero | Difference | NH White | NH Black | NH Asian | Hispanic | Minority | total | % of Total | NH White | NH Black | NH Asian | Hispanic | Minority |

| DISTRICT | POPTOT | PPopWH | POPWH_C | PPopWH_D | POPBL_C | PPopBL_D | POPNA_C | PPopNA_D | POPAS_C | PPopAS_D | POPPI_C | PPopPI_D | POPOT_C | PPopOT_D | PopNonW | PPopNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| DISTRICT | POPTOT | | POPNHWH_C | | POPNHBL_C | | POPNHNA_C | | POPNHAS_C | | POPNHPI_C | | POPNHOT_C | | POPHISP | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| DISTRICT | POPTOT | PPopWhite | POPNH_A | PPopNH_A | POPBL_W | PPopBL_W | POPNA_W | PPopNA_W | POPAS_W | PPopAS_W | POPPI_W | PPopPI_W | POPOT_W | PPopOT_W | PopNonHi | PPopNonHi |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| DISTRICT | POPTOT | | POPNHAN_A | | POPNHH_W | | POPNHA_W | | POPNHA_H | | POPNHP_W | | POPNHOT_W | | POPHISP | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| DISTRICT | VAPTOT | | VAPWH_A | | VAPBL_A | | VAPHS_A | | VAPAS_A | | VAPPI_A | | VAPOT_A | | VAPXX | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| DISTRICT | VAPTOT | P%Pxxx | VAPWH_C | P%PWH_C | VAPBL_C | P%PBL_C | VAPNA_C | P%PNA_C | VAPAS_C | P%PAS_C | VAPPI_C | P%PPI_C | VAPOT_C | P%PPOT_C | PopNH | PPopNH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

| DISTRICT | VAPTOT | PctWh... | VAPWH_A | PctWH_A | VAPBL_W | PctBL_W | VAPNA_W | PctNA_W | VAPA1_W | PctA1_W | VAPPI_W | PctPI_W | VAPOT_W | PctOT_W | PopNonW | PPopNonW |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|

Def. App. 211a

| DISTRICT | VAPTOT | | VAPNHWH_A | | VAPNHBL_W | | VAPNHNA_W | | VAPNHAS_W | | VAPNHPI_W | | VAPNHOT_W | | VAPHISP | | PopNumU | PPopNumU |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|



Def. App. 213a

Def. App. 214a

## SUMMARY CALENDAR FOR CANDIDATE AND PROPOSAL DEADLINES
### August 2, 2022 Primary and November 8, 2022 General Election
### Important Dates and Filing Deadlines

Refer to Michigan compiled law for cited provisions (Legislature.Mi.Gov.) Dates are subject to change through legislative action. If any errors are found, it is the law, itself, which must be followed.

### Election Dates

| | |
|---|---|
| **August 2, 2022** | State Primary |
| **November 8, 2022** | State General Election |

### Registration Deadlines

| | |
|---|---|
| **July 18, 2022** | Last day to register in any manner other than in-person with the local clerk for the August primary. (168.497) |
| **July 19 through 8:00 p.m. August 2, 2022** | In-person registration with local clerk with proof of residency. (168.497) |
| **October 24, 2022** | Last day to register in any manner other than in-person with the local clerk for the November general election. (168.497) |
| **October 25 through 8:00 p.m. November 8, 2022** | In-person registration with local clerk with proof of residency. (168.497) |

### Filing Deadlines:  Candidates

| | |
|---|---|
| **By 5:00 p.m., March 21, 2022** | Incumbent Appeals Court, Circuit Court, District Court and Probate Court judges file Affidavit of Candidacy and Affidavit of Identity for the August primary. Withdrawal deadline elapses at 5:00 p.m. on March 24. (168.409b, 409c, 413a, 414, 433a, 434, 467c and 467d) |
| **By 4:00 p.m., April 19, 2022** | Candidates seeking Appeals Court, Circuit Court, District Court or Probate Court judgeships file nonpartisan nominating petitions, Affidavit of Identity and Affidavit of Constitutional Qualification for the August primary. Withdrawal deadline elapses at 5:00 p.m. on April 22. (168.409b, 409c, 413, 414, 433, 434, 467b and 467d) |
| **By 4:00 p.m., April 19, 2022** | Candidates seeking a Wayne County Community College Trustee position file an Affidavit of Identity and a nonpartisan nominating petition. Withdrawal deadline elapses at 4:00 p.m. on April 22. (389.83, 168.303) |

## Def. App. 215a

| | |
|---|---|
| **By 4:00 p.m., April 19, 2022** | Candidates for partisan and nonpartisan offices (other than judicial candidates) file nominating petitions (or fees if applicable) and Affidavit of Identity for the August primary. Withdrawal deadline elapses at 4:00 p.m. on April 22. (168.133 and 163 for federal and state-level offices; assorted other statutes for local offices) |
| **By 4:00 p.m., May 3, 2022** | Candidates for county convention delegate (precinct delegate) file an Affidavit of Identity for the August primary. Filing submitted to the clerk of the county in which candidate resides. Withdrawal deadline elapses at 4:00 p.m. on May 6. (168.624, 624a) |
| **By 5:00 p.m., July 5, 2022** | Incumbent Supreme Court Justices file Affidavit of Identity and Affidavit of Candidacy forms for the November general election. (168.392a and 558) |
| **By 4:00 p.m., July 21, 2022** | District Library Board candidates for districts that do not include a school district file an Affidavit of Identity and a nonpartisan nominating petition. (A $100.00 nonrefundable fee may be filed in lieu of a petition.) (Special note: If district library includes a school district, District Library Board candidates file by 4:00 p.m. on August 16, 2022) (397.181) |
| **By 4:00 p.m., July 21, 2022** | Candidates without political party affiliation seeking partisan offices file qualifying petitions and Affidavit of Identity for the November general election. Withdrawal deadline elapses at 4:00 p.m. on July 25. (168.590c) |
| **By 4:00 p.m., July 22, 2022** | Write-in candidates other than write-in candidates who seek precinct delegate positions file Declaration of Intent forms for the August primary. (168.737a) |
| **By 4:00 p.m., July 26, 2022** | Candidates for Local School Board and Community College Trustee file an Affidavit of Identity and a nonpartisan nominating petition. (A $100.00 nonrefundable fee may be filed in lieu of a petition.) Withdrawal deadline elapses at 4:00 p.m. on July 29. (168.303; 389.152) |
| **By 4:00 p.m., July 26, 2022** | Candidates for village offices file an Affidavit of Identity and a nonpartisan nominating petition. Withdrawal deadline elapses at 4:00 p.m. on July 29. (168.381) |
| **By 4:00 p.m., July 29, 2022** | Write-in candidates who seek precinct delegate positions file Declaration of Intent forms with the county clerk for the August primary. (As an alternative, candidates for precinct delegate may file the Declaration of Intent form with appropriate precinct board on election day before the close of the polls.) (168.737a) |
| **August 2, 2022** | **STATE PRIMARY ELECTION** |

| | |
|---|---|
| **By 4:00 p.m.,**<br>**August 16, 2022** | District Library Board candidates for districts that include a school district file an Affidavit of Identity and a nominating petition. (A $100.00 nonrefundable fee may be filed in lieu of a petition.) (Special note: If district library does not include a school district, District Library Board candidates file by 4:00 p.m. on July 21, 2022). (397.181) |
| **By 4:00 p.m.,**<br>**Oct. 28, 2022** | Write-in candidates file Declaration of Intent forms for the November general election. (168.737a) |
| **November 8, 2022** | **STATE GENERAL ELECTION** |

### Filing Deadlines: New Parties and State Ballot Proposals

| | |
|---|---|
| **By 5:00 p.m.,**<br>**June 1, 2022** | Petitions to place a legislative initiative proposal on the November general election ballot filed with the Secretary of State (340,047 valid signatures required). (168.471) |
| **By 5:00 p.m.,**<br>**July 11, 2022** | Petitions to place a proposed constitutional amendment on the November general election ballot filed with the Secretary of State (425,059 valid signatures required). (168.471) |
| **By 4:00 p.m.,**<br>**July 21, 2022** | New political parties file petitions to qualify for November general election ballot (42,506 valid signatures required). (168.685) |

### Filing Deadlines: County and Local Proposals

| | |
|---|---|
| **By 5:00 p.m.,**<br>**April 26, 2022** | Petitions to place county and local questions on the August primary ballot filed with county and local clerks. (168.646a) |
| **By 4:00 p.m.,**<br>**May 10, 2022** | Ballot wording of county and local proposals to be presented at the August primary certified to county and local clerks; local clerks receiving ballot wording forward to county clerk within two days. (168.646a) |
| **By 5:00 p.m.,**<br>**August 2, 2022** | Petitions to place county and local questions on the November general election ballot filed with county and local clerks. (168.646a) |
| **By 4:00 p.m.,**<br>**August 16, 2022** | Ballot wording of county and local proposals to be presented at the November general election certified to county and local clerks; local clerks receiving ballot wording forward to county clerk within two days. (168.646a) |