

SC101570

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IN THE SUPREME COURT OF MISSOURI

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ELIZABETH HEALEY, et al.,

Appellants,

v.

STATE OF MISSOURI, et al.,

Respondents.

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From the Circuit Court of Jackson County, Missouri

The Honorable Adam L. Caine, Circuit Judge

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**APPELLANTS' EXHIBITS (VOLUME IV)**

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## APPELLANTS' EXHIBIT LIST

Pursuant to Missouri Supreme Court Rule 81.16(a), Appellants provide this Court with exhibits Appellants believe are “necessary to the determination of any point relied on[.]” A listing and description of the exhibits deposited by Appellants are included below.

| <b>Exhibit Number</b>    | <b>Description</b>                               |
|--------------------------|--|
| <b><i>Volume I</i></b>   |  |
| PX 05                    | Elizabeth Healey Affidavit                       |
| PX 06                    | Giselle Anatol Affidavit                         |
| PX 07                    | Marques Bussey Affidavit                         |
| PX 08                    | Mary Sapp Affidavit                              |
| PX 09                    | Louie Wright Affidavit                           |
| PX 21                    | Dr. Stern Dec. 30 Report (Amended)               |
| PX 22                    | Dr. Stern Jan. 14 Rebuttal Report                |
| PX 23                    | Dr. Cervas Dec. 30 Report (Amended)              |
| <b><i>Volume II</i></b>  |  |
| PX 24                    | Dr. Cervas Jan 14. Rebuttal Report               |
| PX 25                    | Dr. Cromartie Dec. 22 Report                     |
| PX 26                    | Dr. Cromartie Jan. 14 Rebuttal Report            |
| PX 27                    | Dr. Rodden Dec. 22 Report                        |
| PX 28                    | Dr. Rodden Jan. 14 Rebuttal Report               |
| PX 30                    | Gov. Kehoe Aug. 29 Proclamation                  |
| PX 31                    | Gov. Kehoe Aug. 29 X Map Post                    |
| PX 32                    | Gov. Kehoe Aug. 29 X Video                       |
| PX 33                    | Gov. Aug. 30 MO First Map PR                     |
| PX 35                    | SOS May 2022 Email (EalomDep.1)                  |
| PX 36                    | SOS May 2022 Email (Zorich Prod.)                |
| PX 37                    | SOS May 2022 Email Att. (KiefferDep.2)           |
| PX 39                    | SOS Jan. 2026 Email (KiefferDep.3)               |
| PX 40                    | HB 1 Bill Text                                   |
| PX 41                    | HB 1 Map Image                                   |
| <b><i>Volume III</i></b> |  |
| PX 42                    | HB 1 Landscape Maps (District)                   |
| PX 43                    | HB 2909 Bill Text                                |
| PX 44                    | HB 2909 Map Image                                |
| PX 45                    | HB 2117 Joint Press Release                      |
| PX 46                    | HB 2117 House Committee Passage Press Release    |
| PX 47                    | HB 2117 House Passage Press Release              |
| PX 48                    | House Special Committee on Redistricting Meeting |
| PX 50                    | Gov. Parson HB 2902 PR                           |
| PX 84                    | Maps w/ Density Compilation                      |

| <i>Volume IV</i> |   |
|------------------|---|
| PX 86            | Cervas Alternative Maps                             |
| PX 87            | Joint Stipulations                                  |
| DX 101           | Amended Expert Report of Dr. Trende (Jan. 13, 2026) |
| IX 215           | Expert Report of M.V. (Trey) Hood III               |

PX 32 and PX 48 are video exhibits and will be delivered on a DVD to the Court. Appellants certify that the disk submitted disk submitted has been scanned for viruses and that it is virus-free.

Dated: April 22, 2026

Respectfully submitted,

/s/ J. Andrew Hirth

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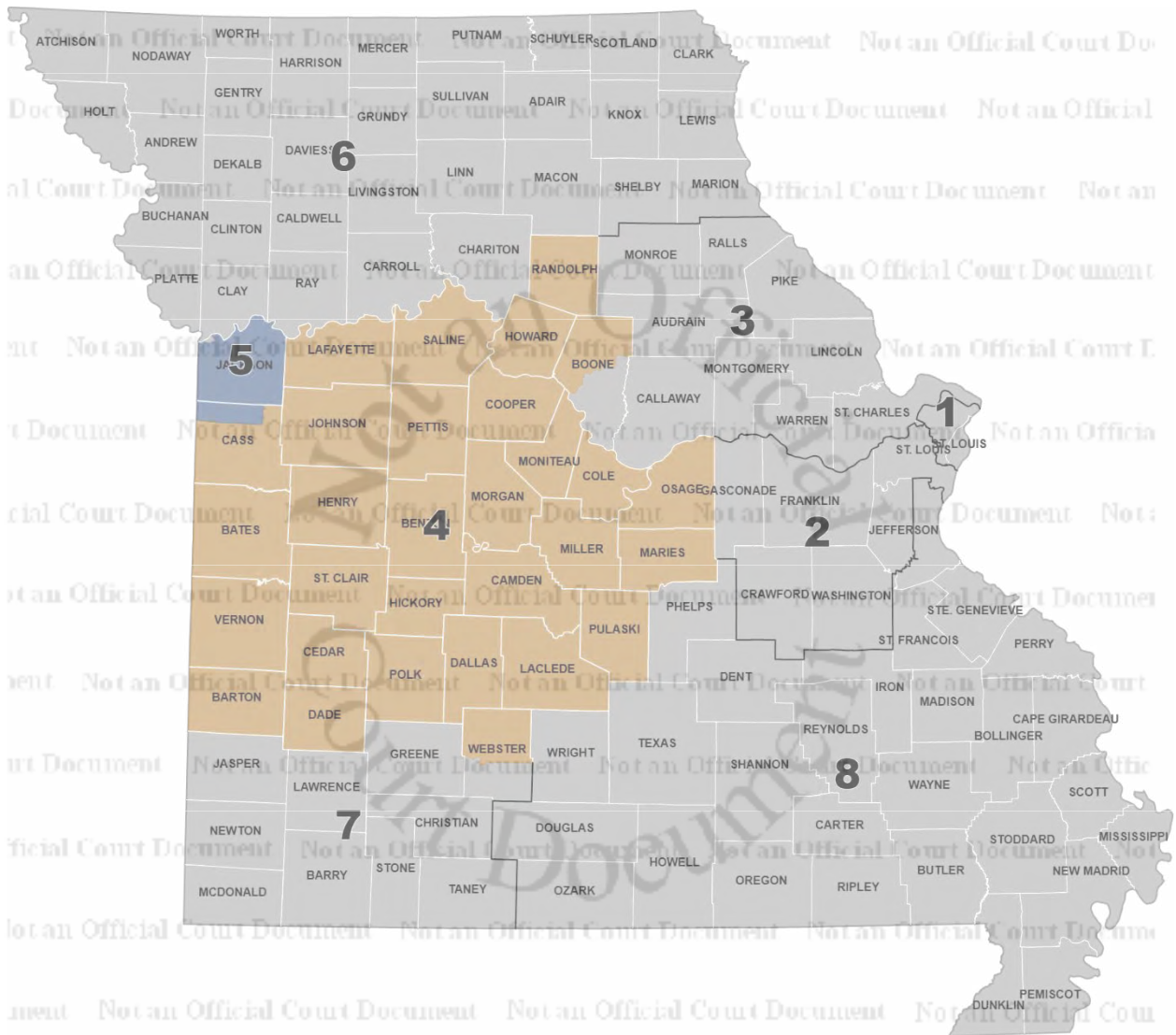
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*Counsel for Appellants*

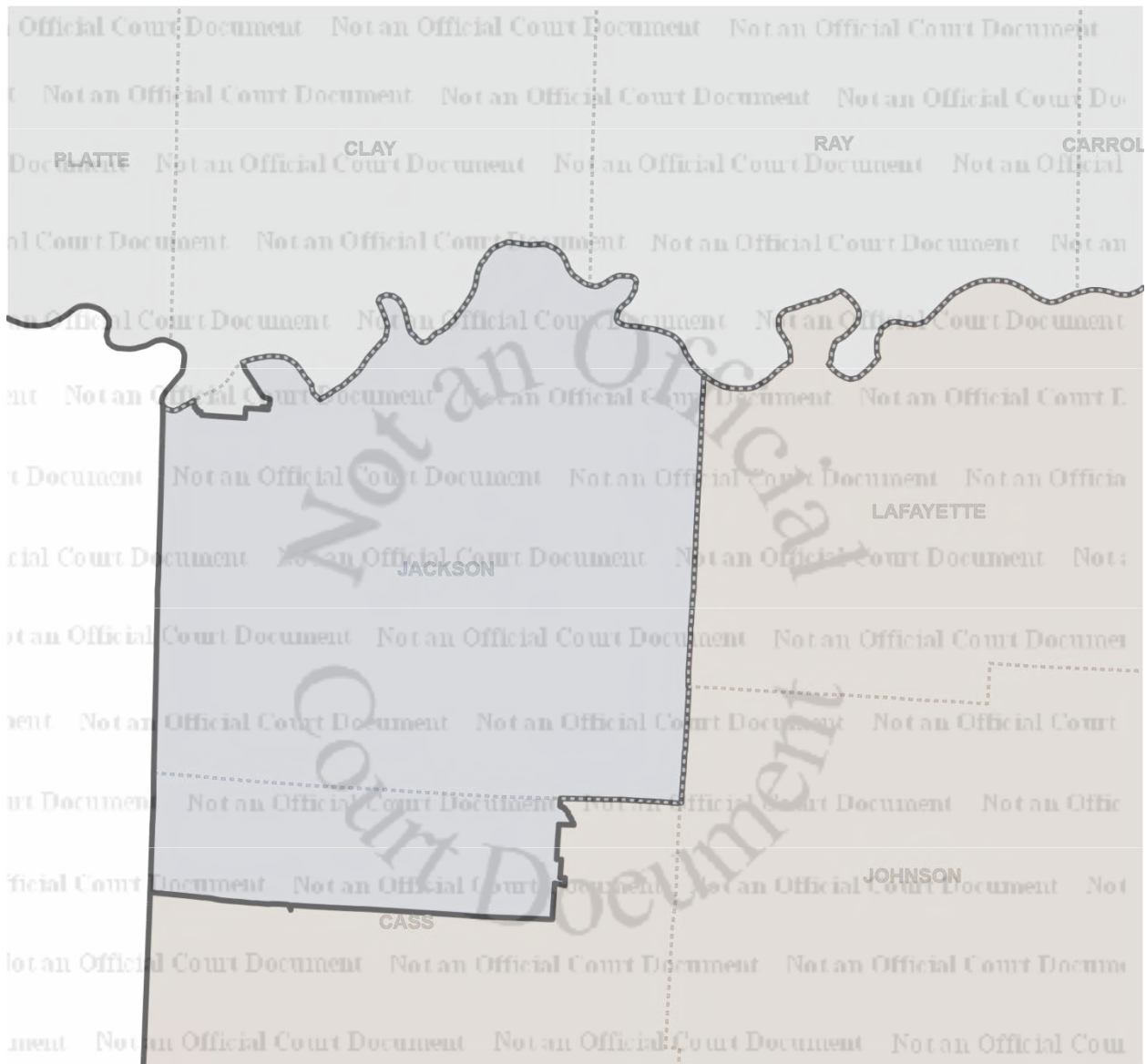
*\*Admitted pro hac vice*

## SUMMARY COMPILATION: CERVAS ALTERNATIVE MAPS

## Cervas 1 (Statewide)

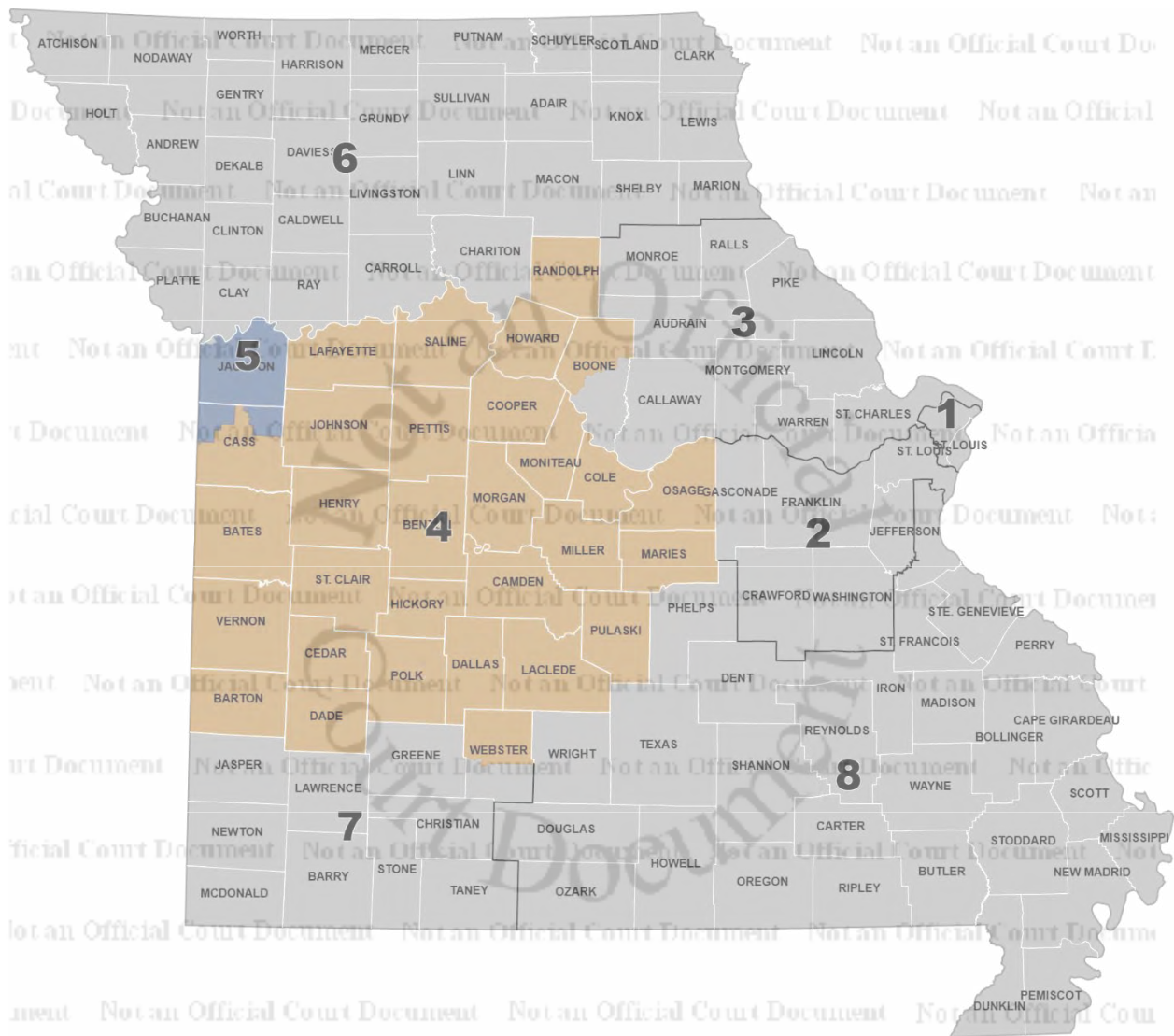


Cervas 1 (Jackson County Area)

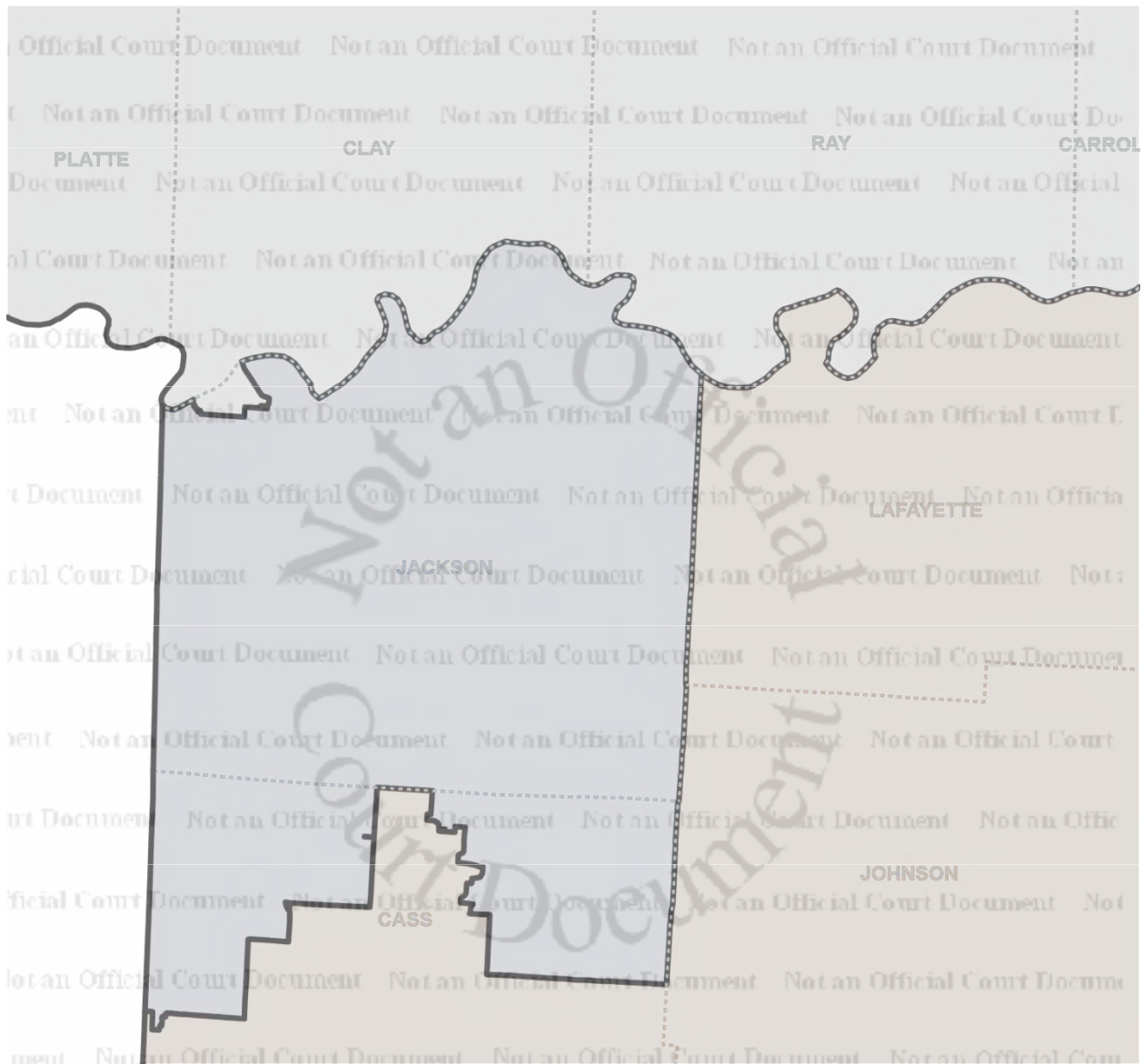




## Cervas 2 (Statewide)

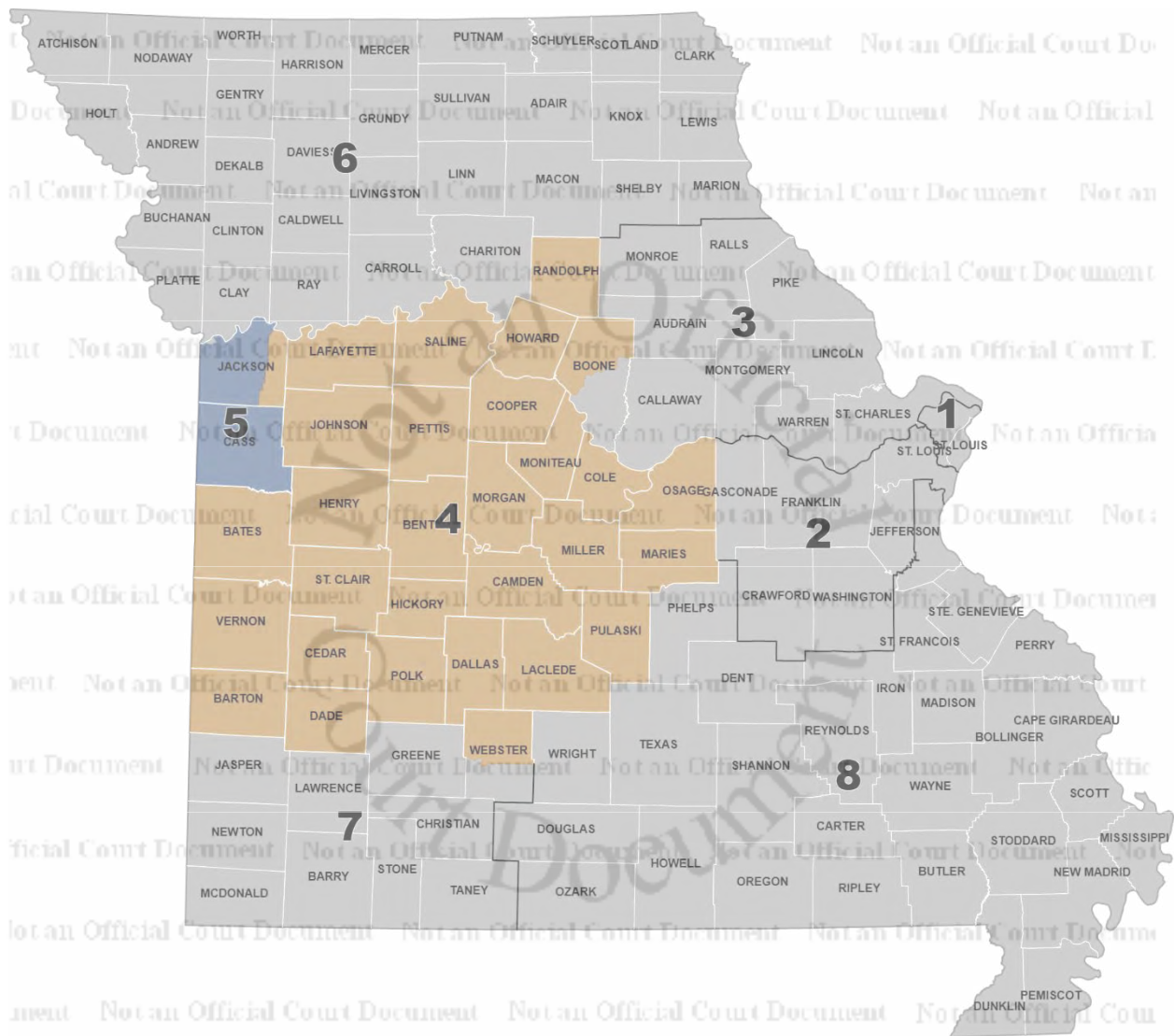


Cervas 2 (Jackson County Area)

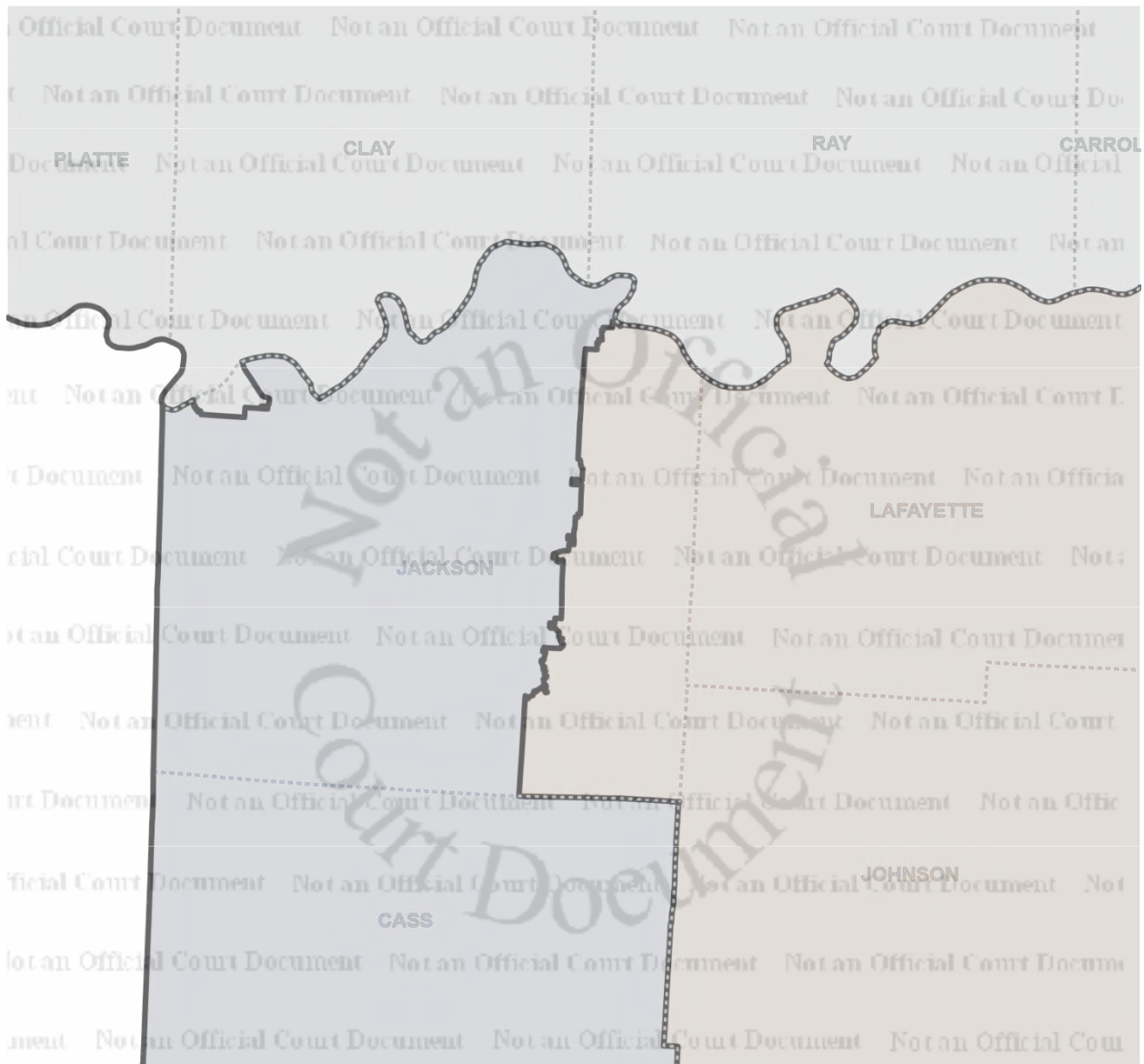




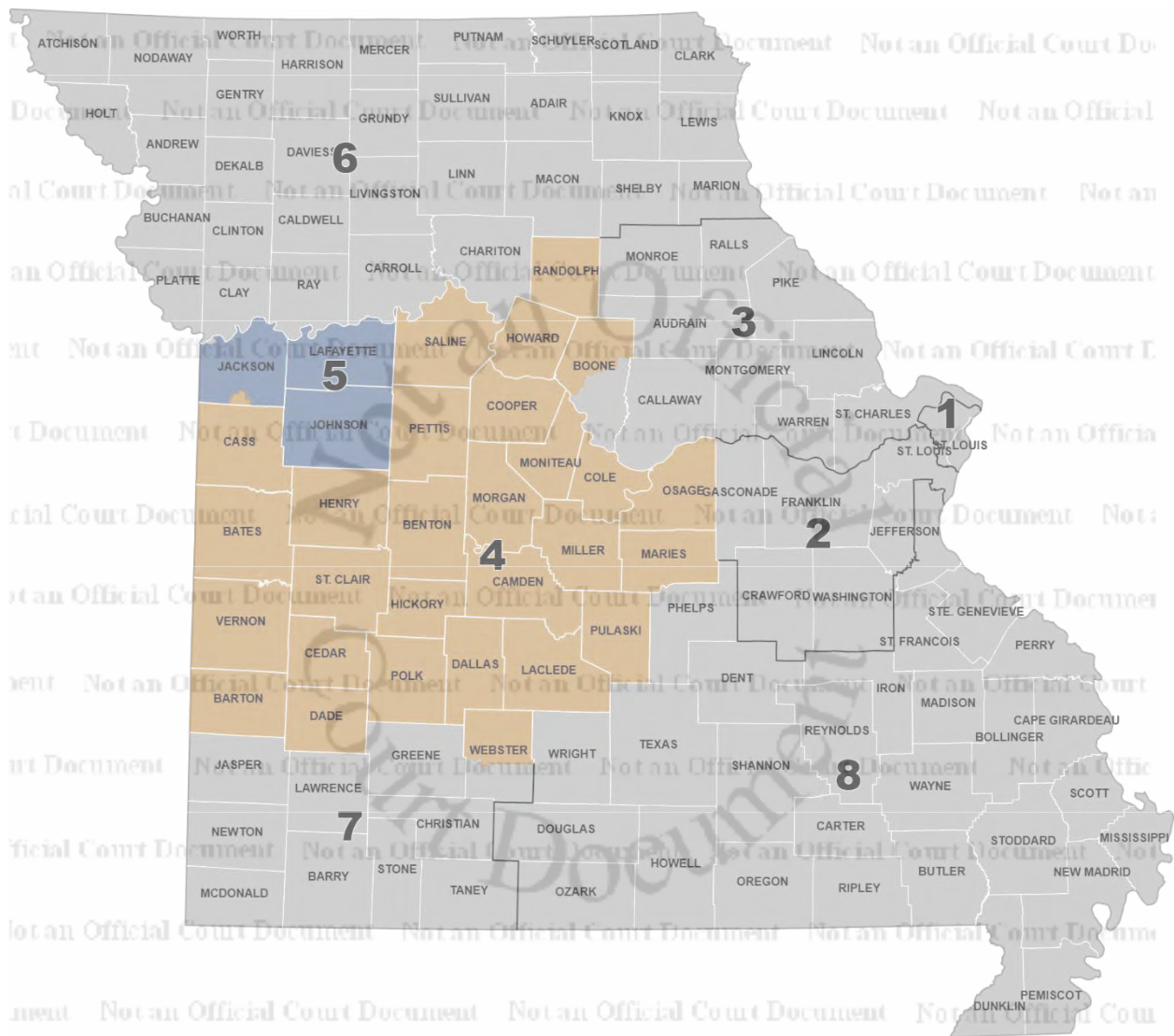
### Cervas 3 (Statewide)



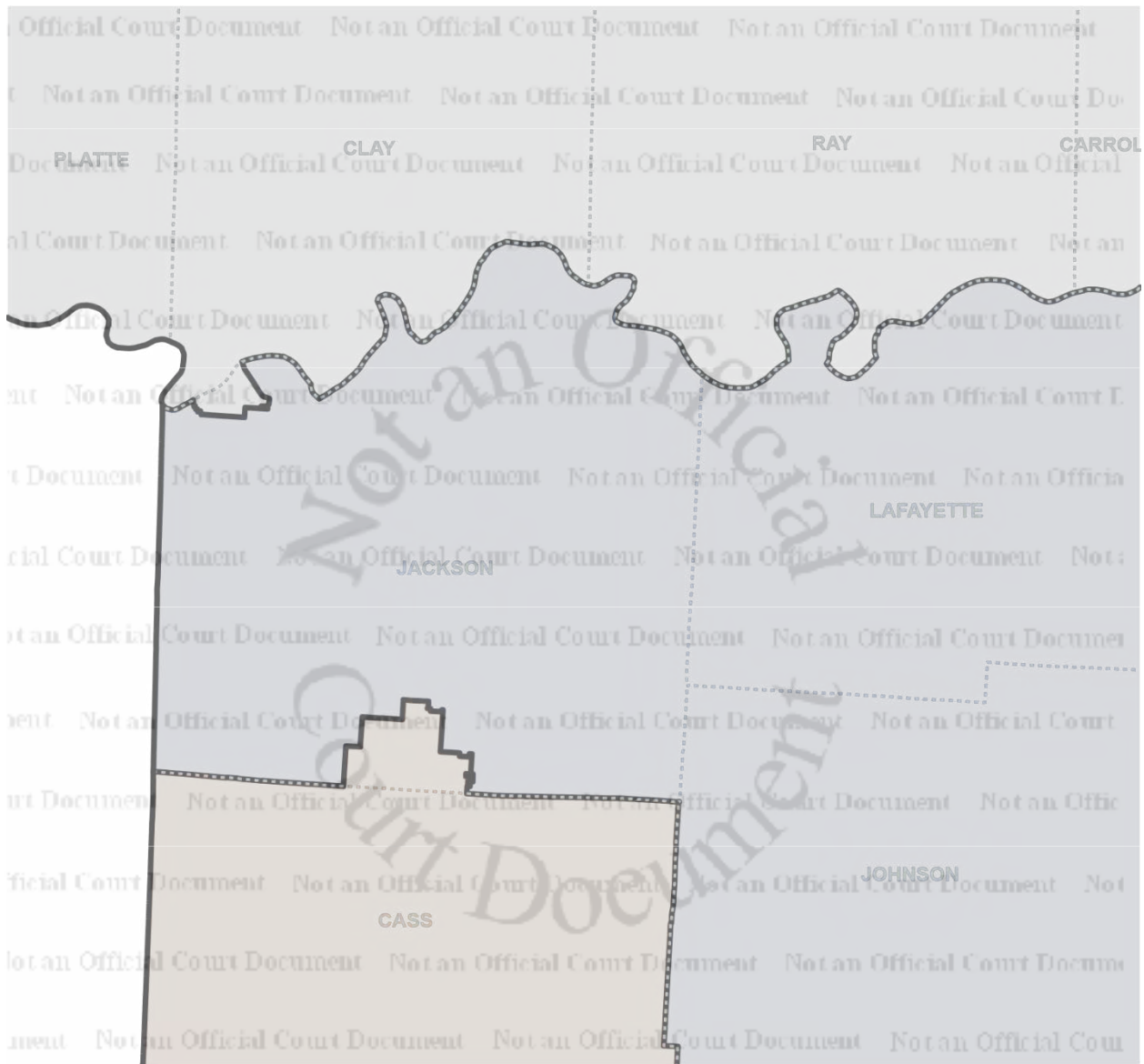
Cervas 3 (Jackson County Area)



## Cervas 4 (Statewide)

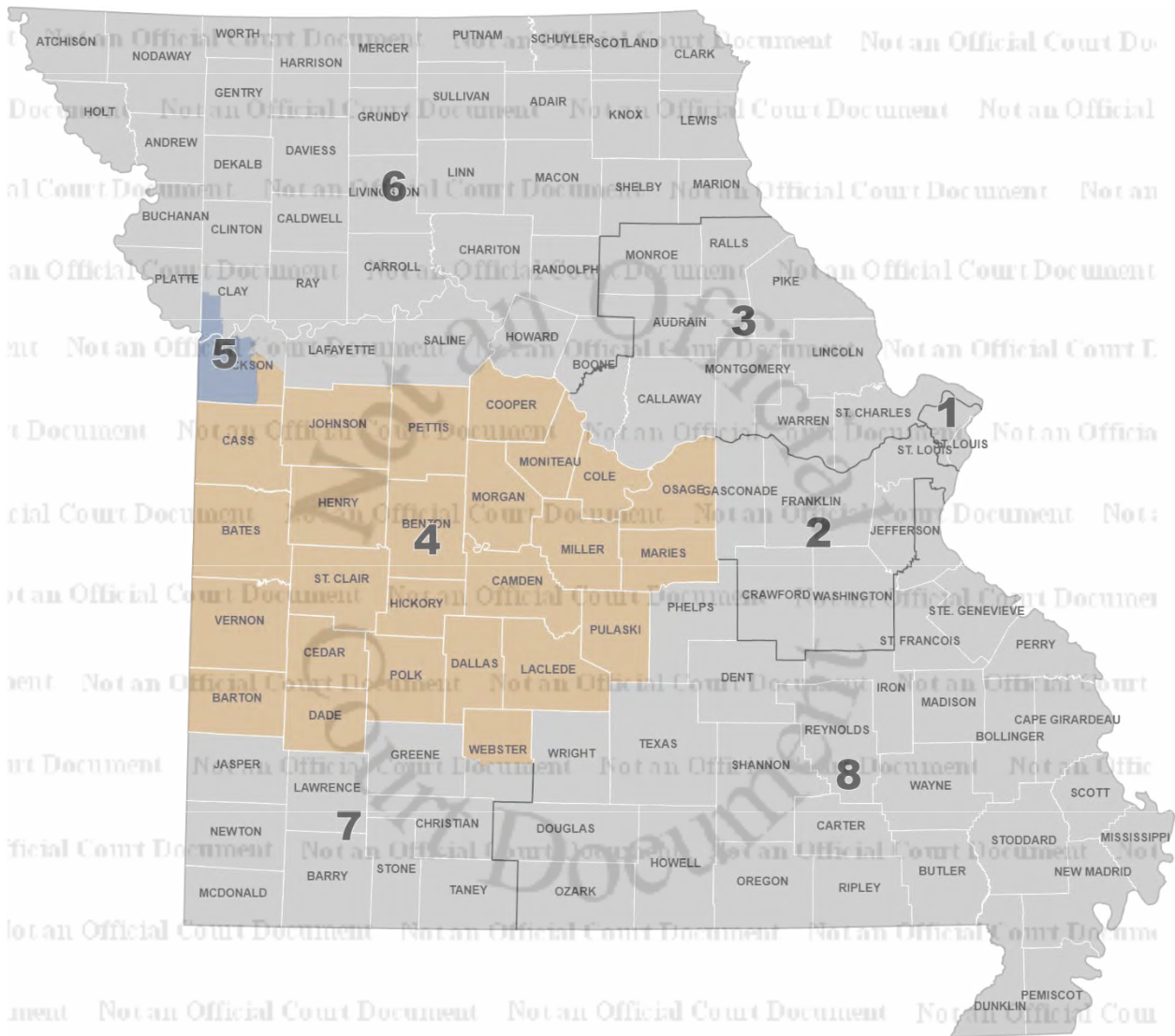


Cervas 4 (Jackson County Area)



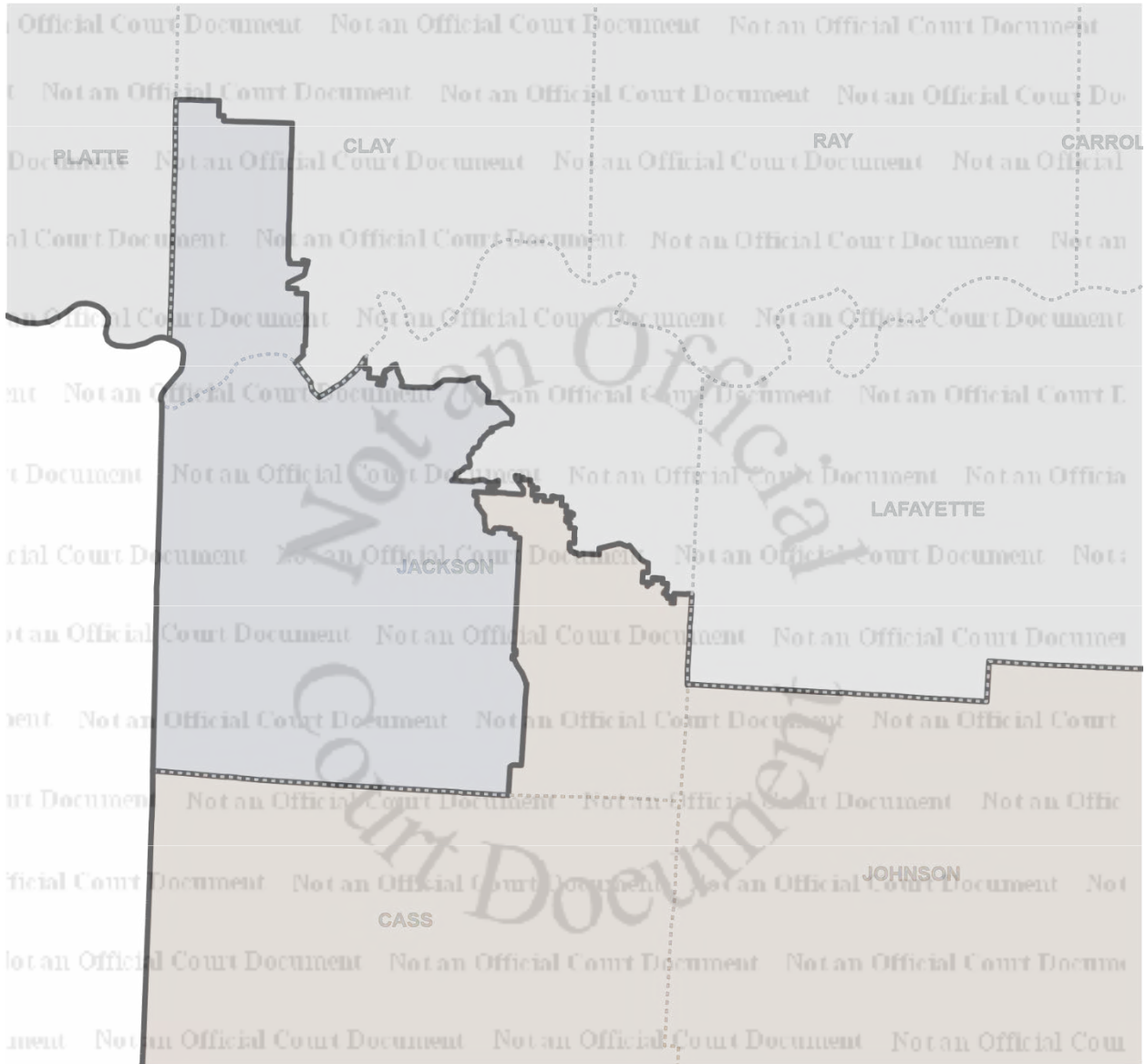


Cervas 5 (Statewide)



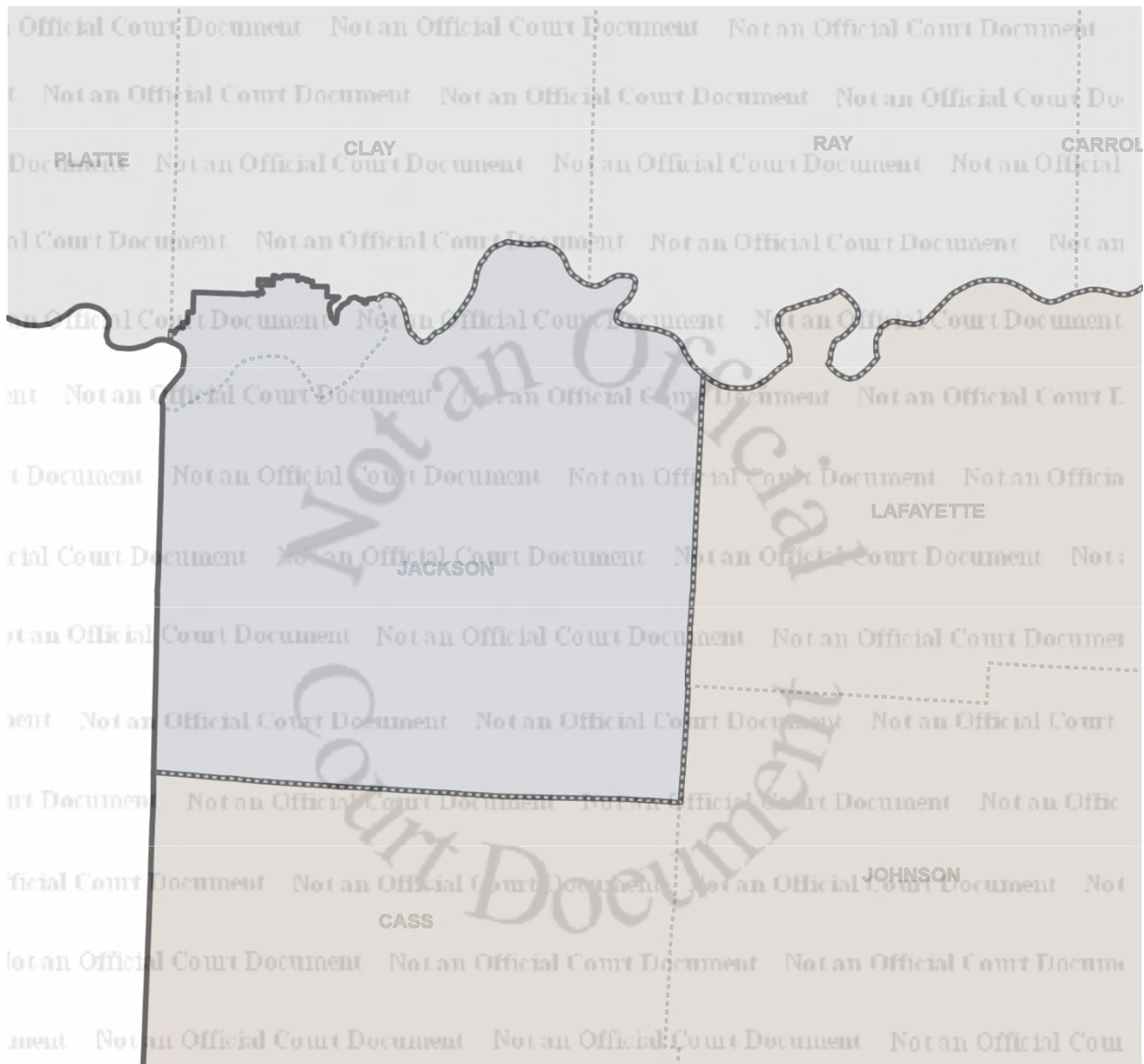


Cervas 5 (Jackson County Area)

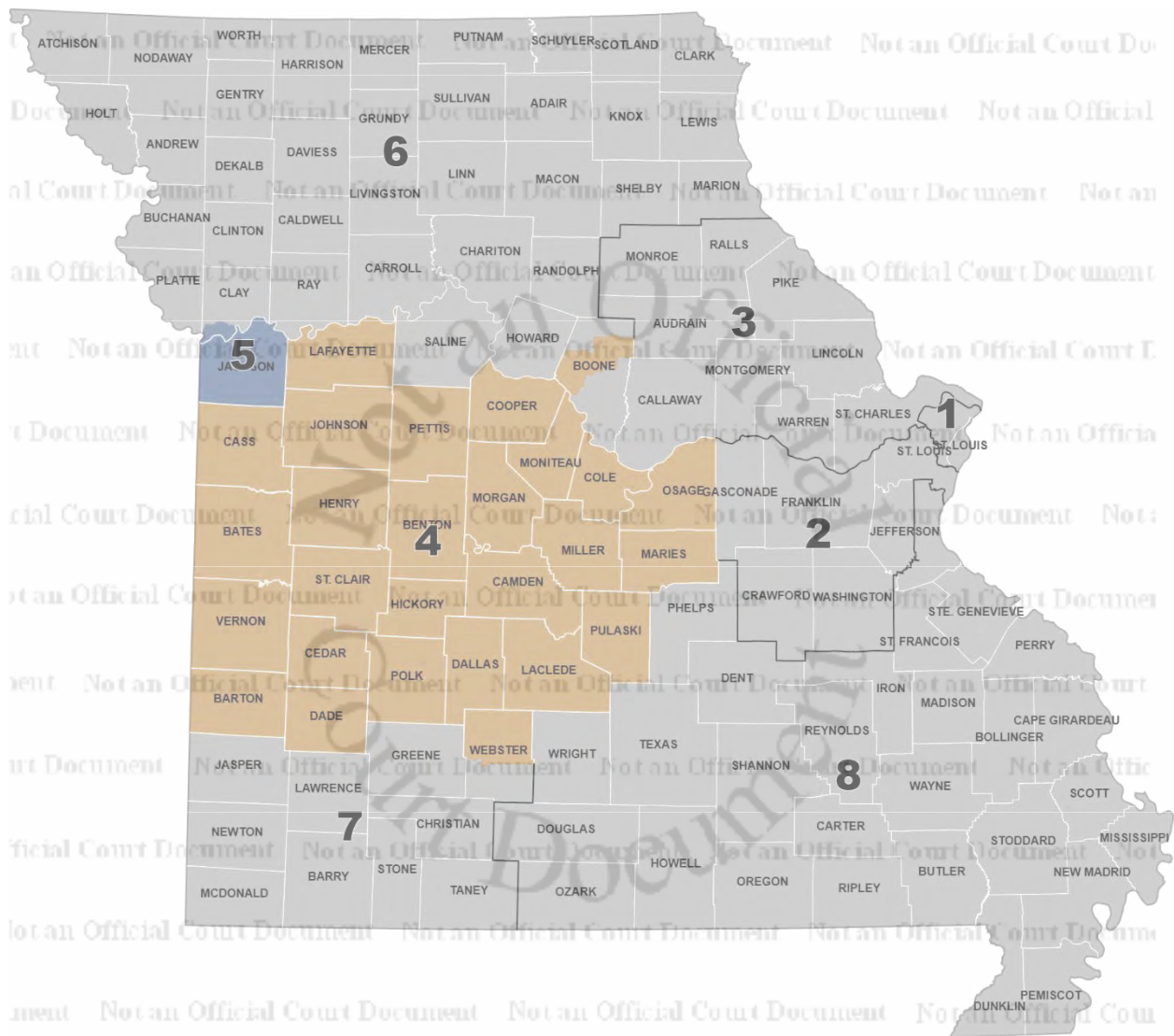




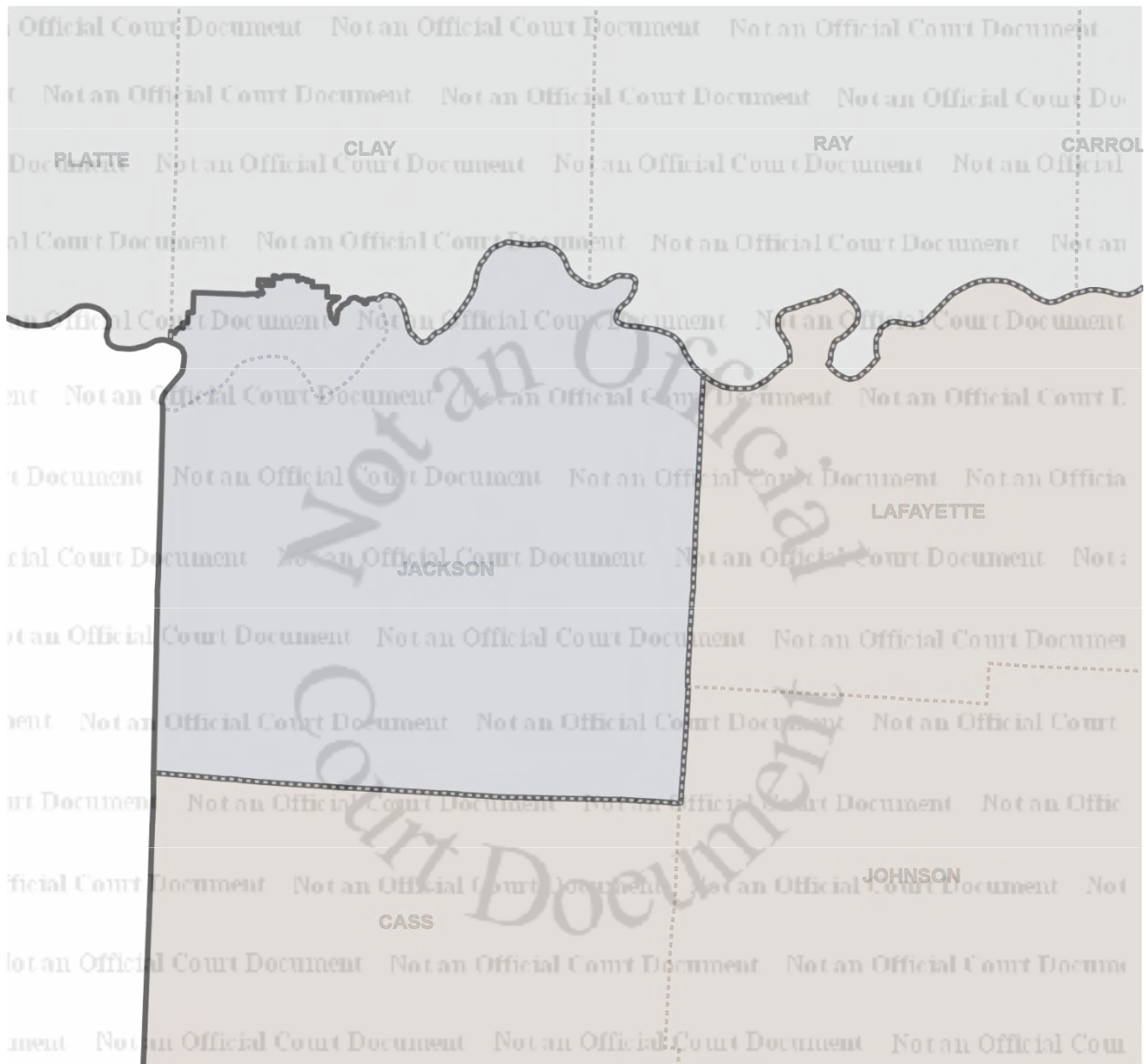
Cervas 6 (Jackson County Area)



## Cervas 7 (Statewide)

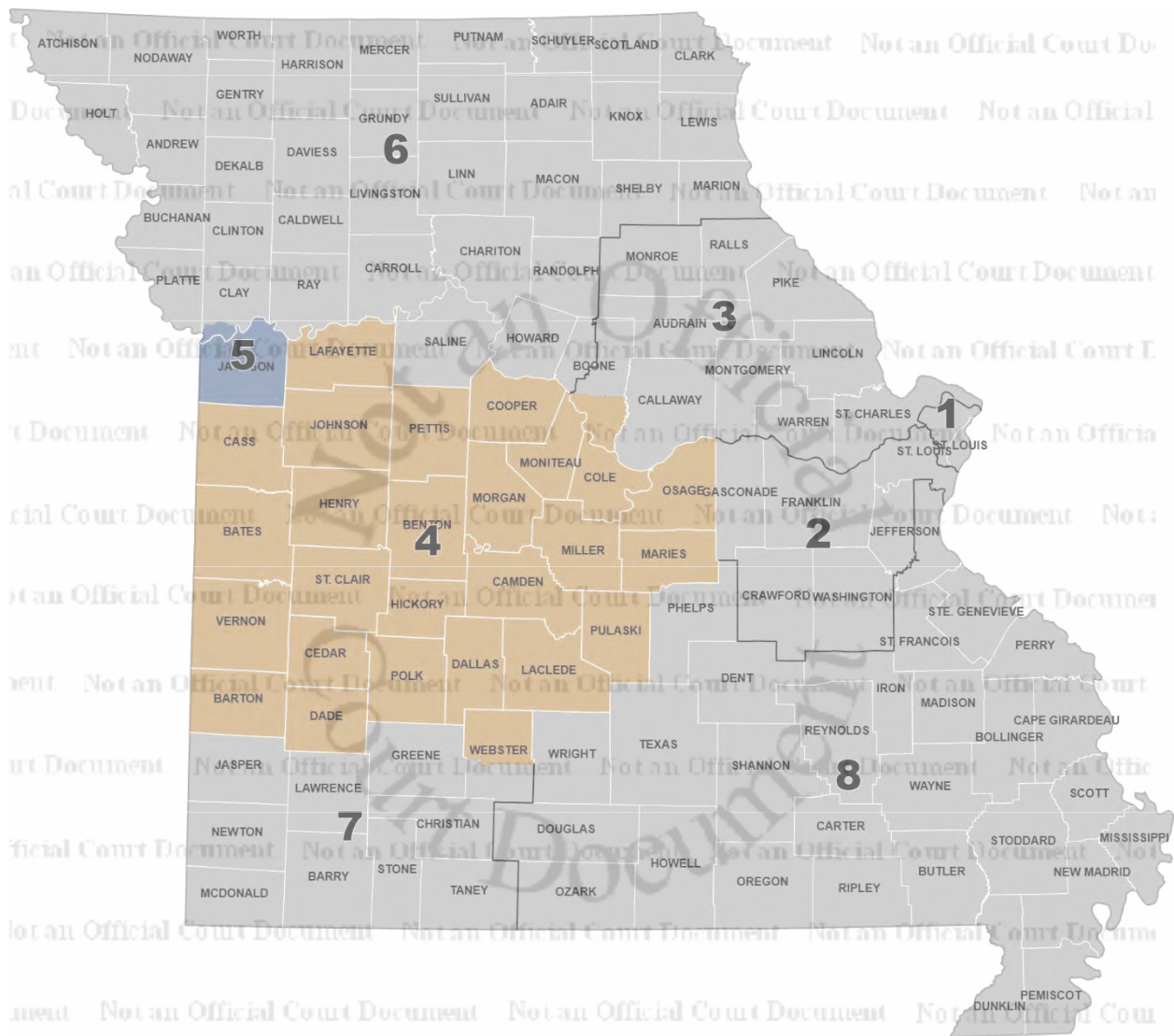


Cervas 7 (Jackson County Area)

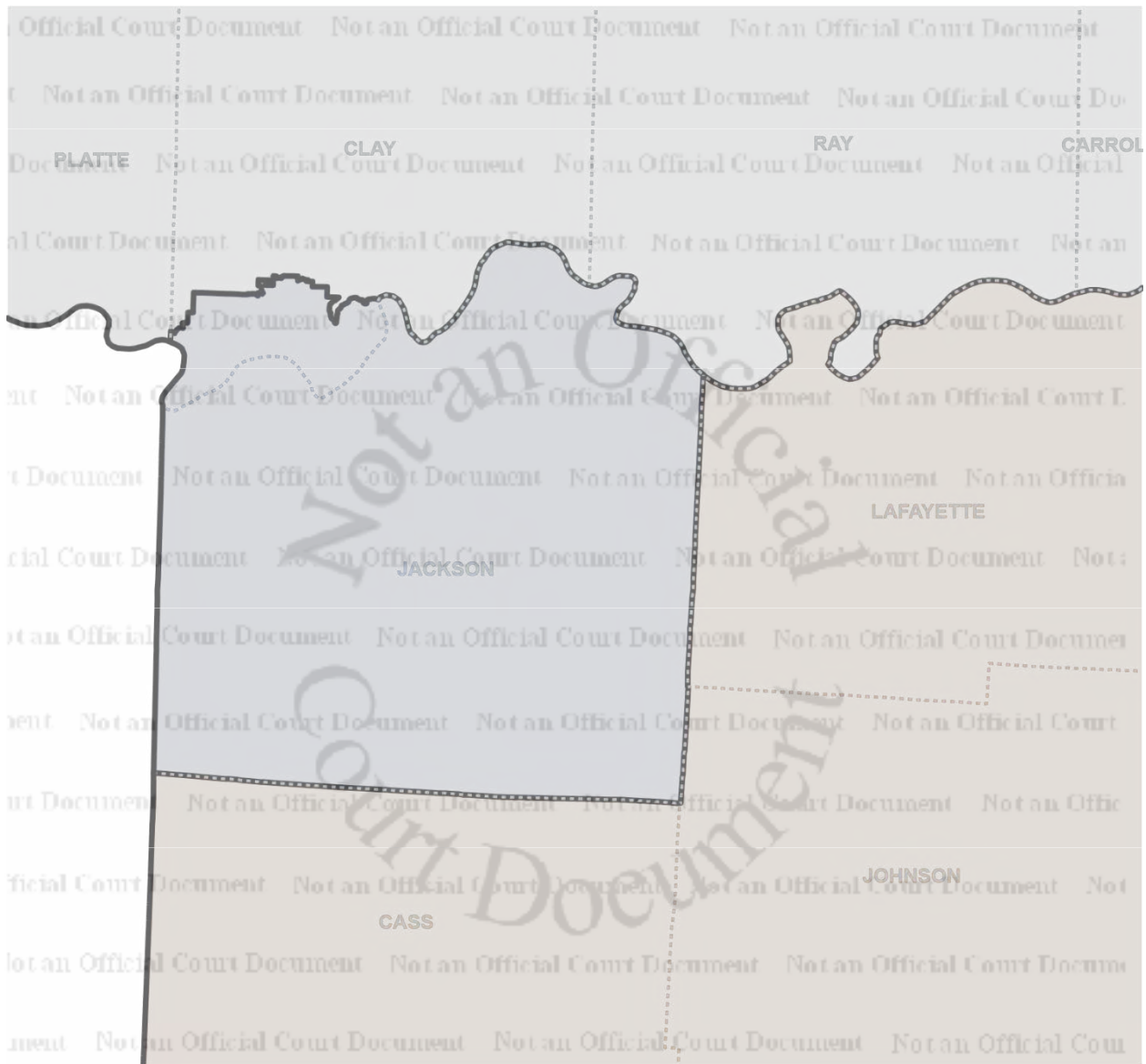




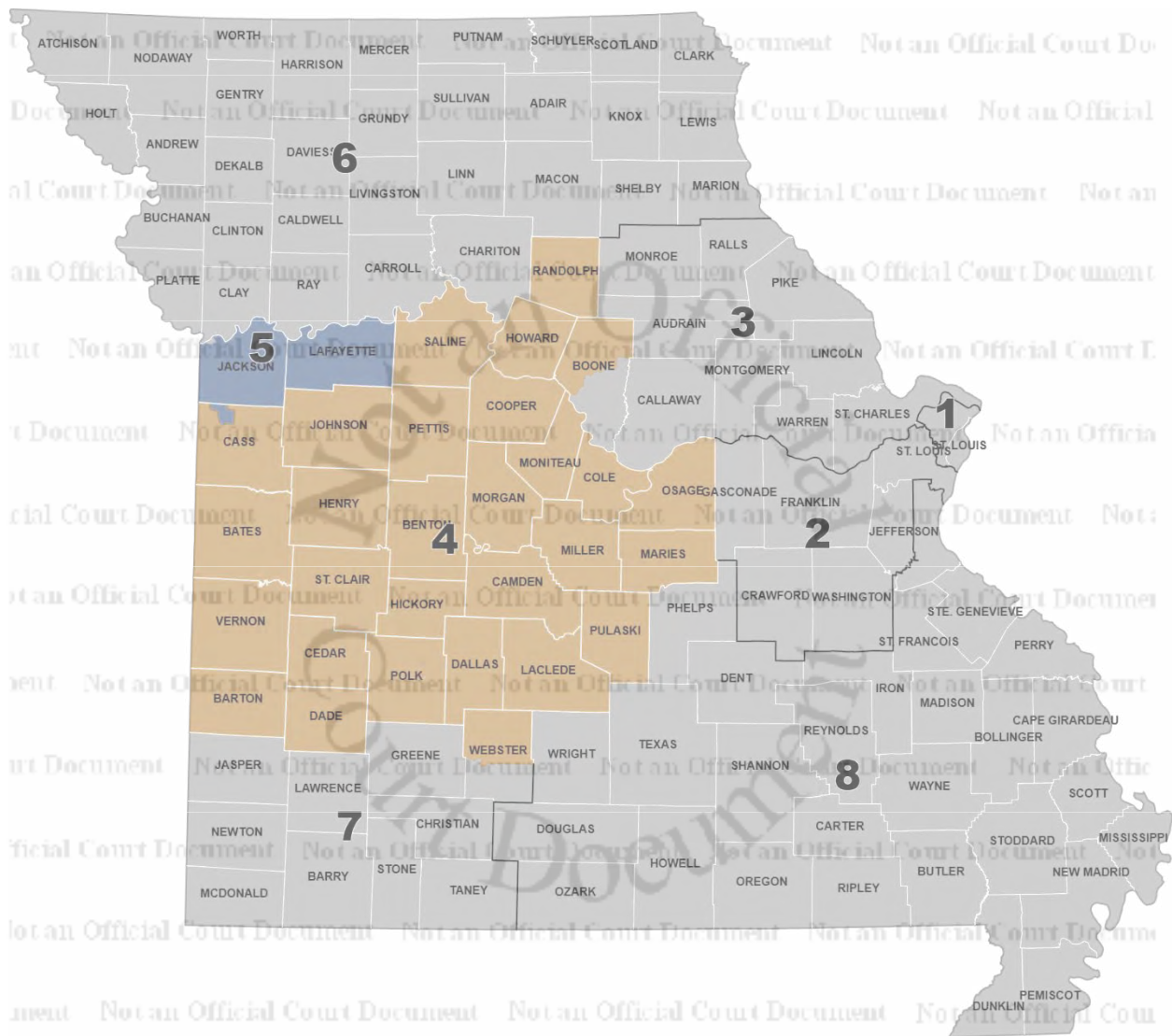
Cervas 8 (Statewide)



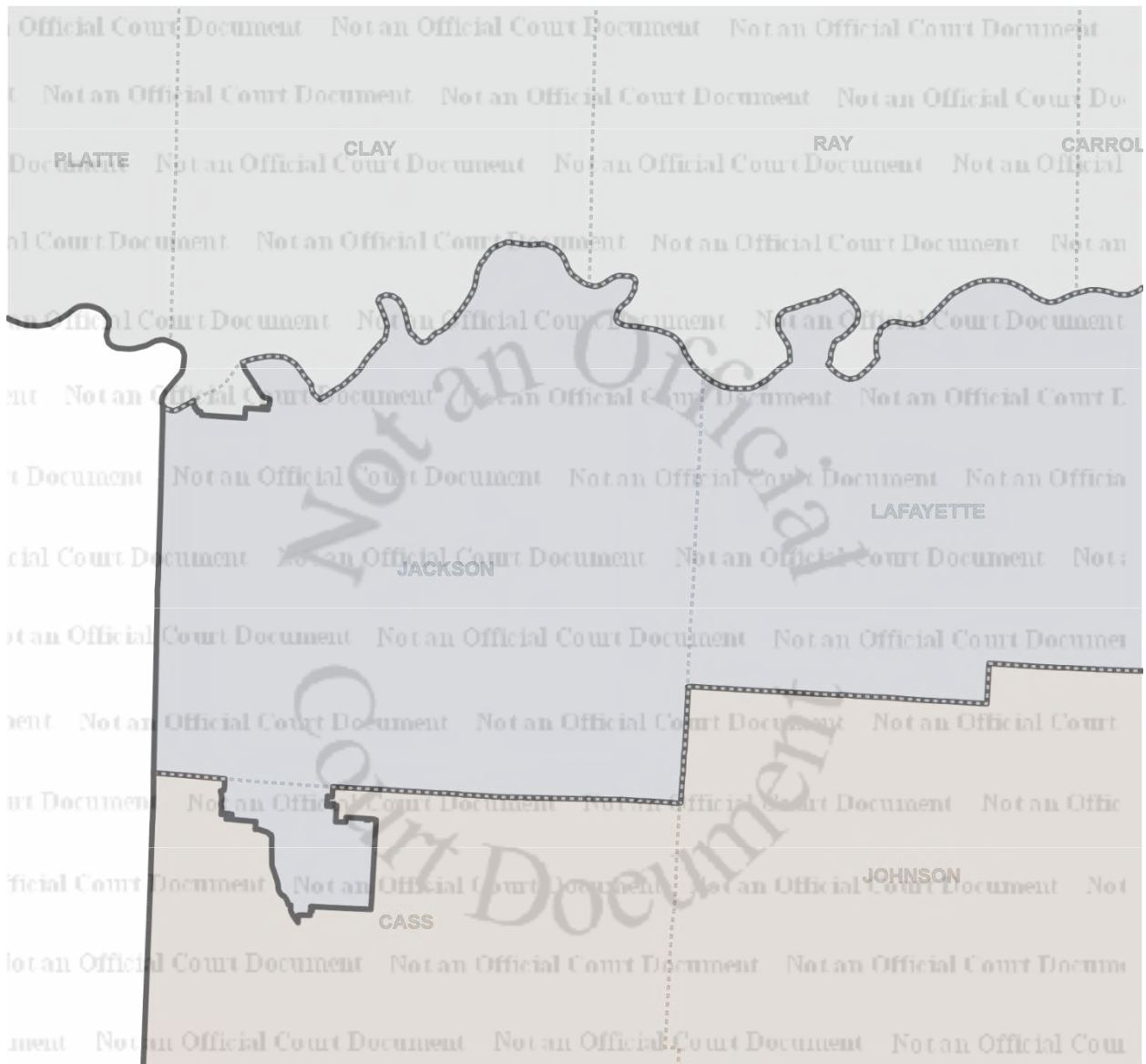
Cervas 8 (Jackson County Area)



### Adjusted Map 11029 (Statewide)

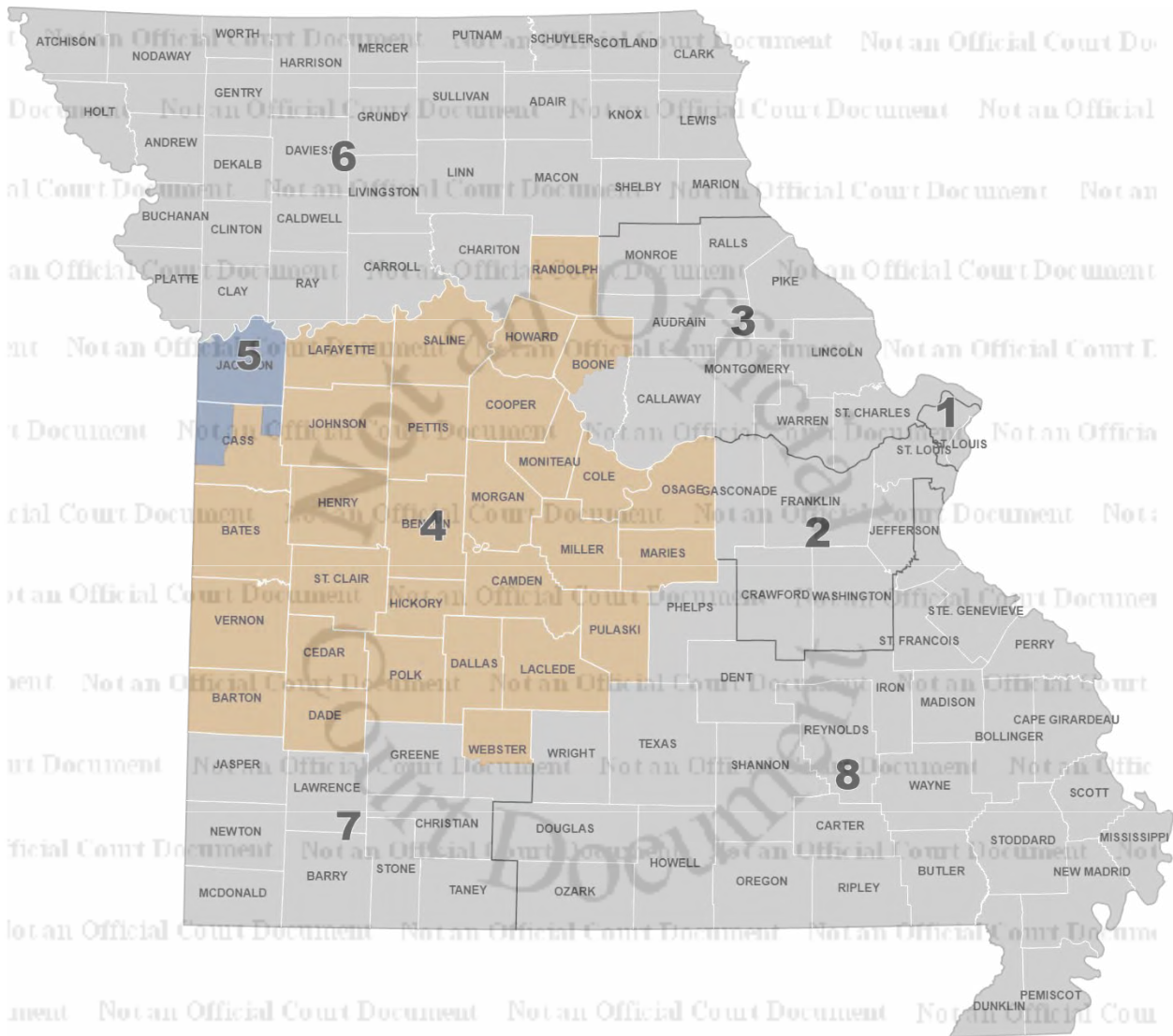


Adjusted Map 11029 (Jackson County Area)



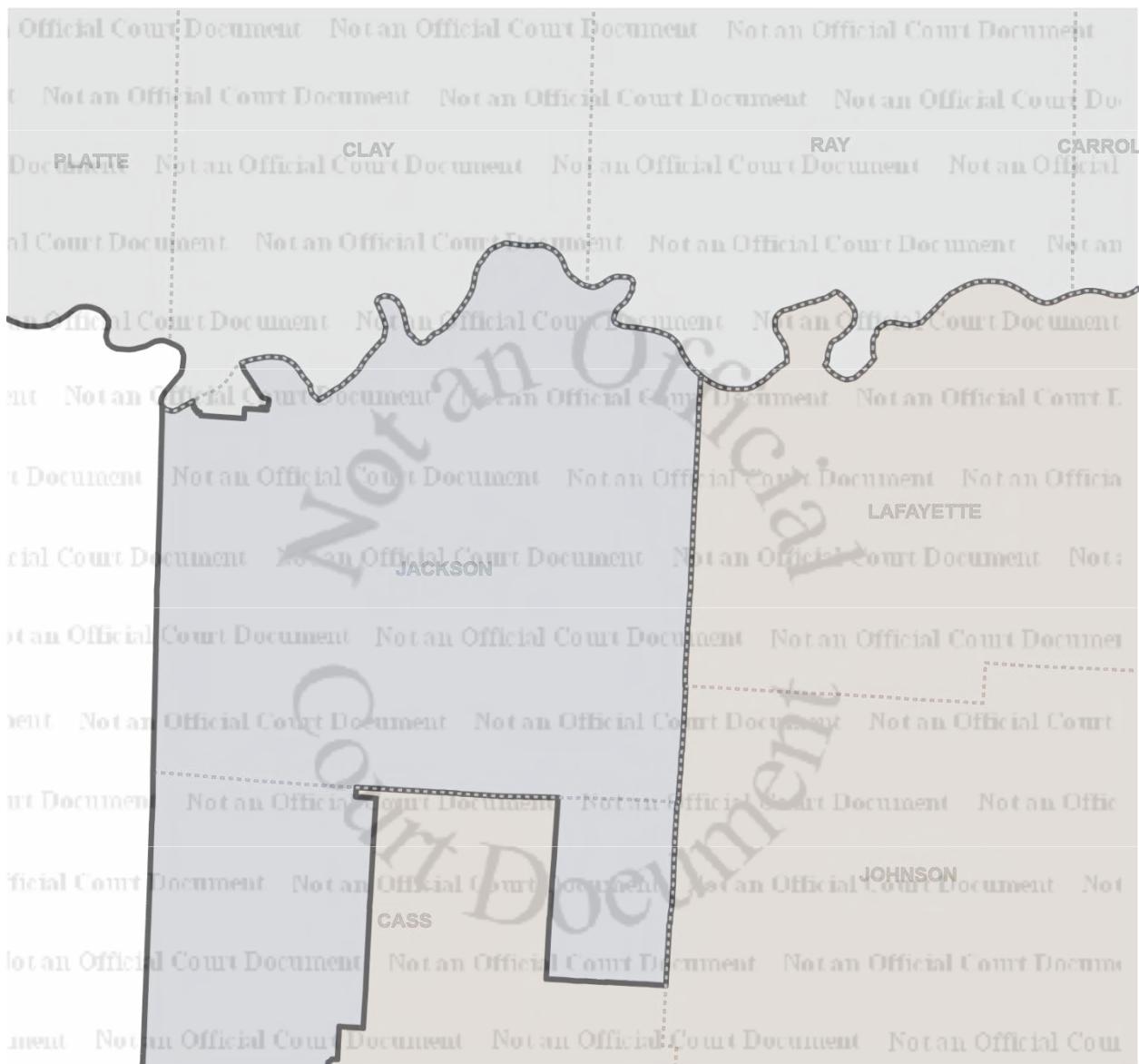


Adjusted Map 11163 (Statewide)



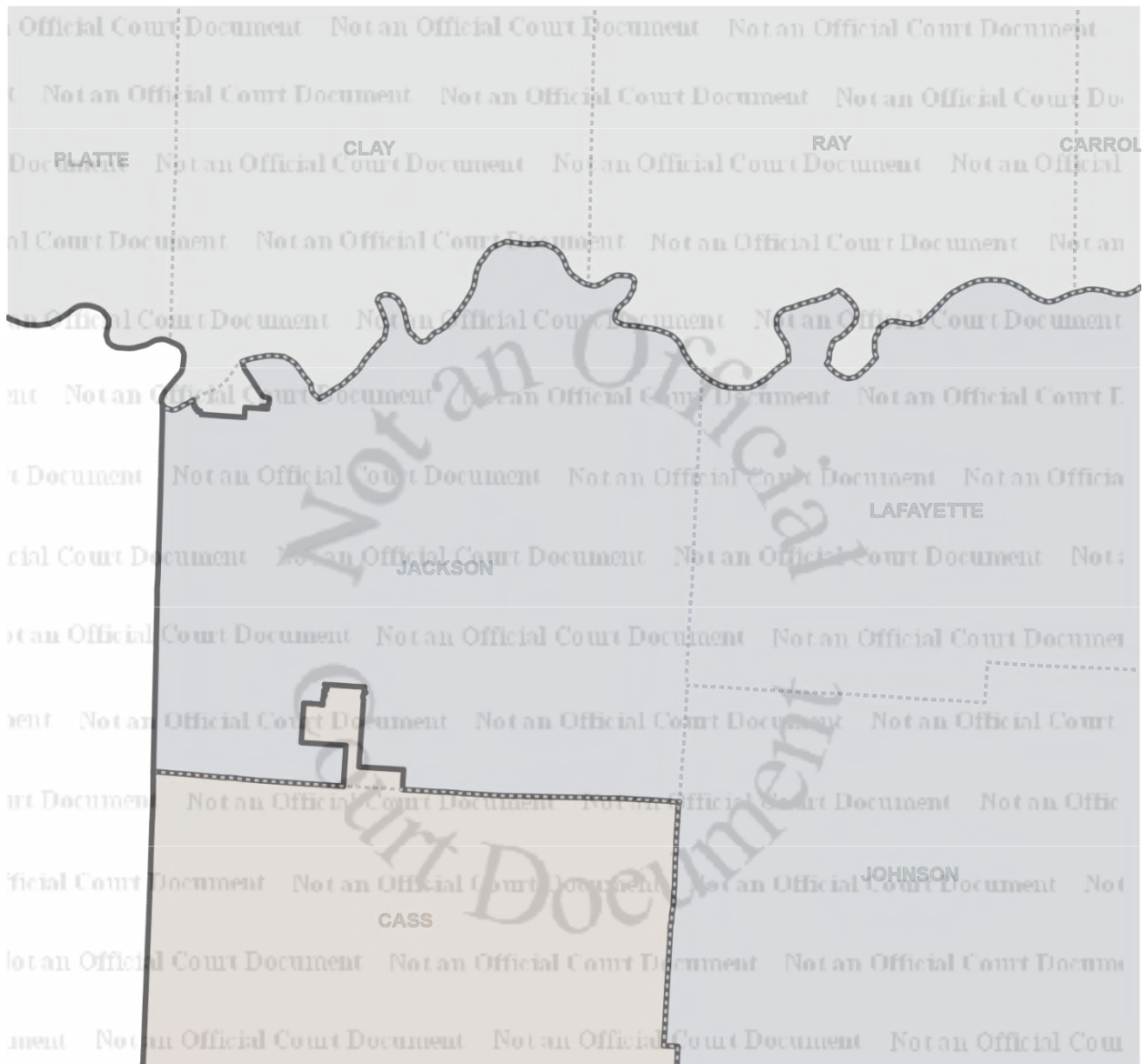


Adjusted Map 11163 (Jackson County Area)





Adjusted Map 71871 (Jackson County Area)



**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

**TERRENCE WISE, et al.,**

**Plaintiffs,**

**Case No. 2516-CV29597**

**STATE OF MISSOURI, et al.,**

**Division 15**

**Defendants.**

**ELIZABETH HEALEY, et al.,**

**Plaintiffs,**

**Case No. 2516-CV31273**

**STATE OF MISSOURI, et al.,**

**Division 15**

**Defendants.**

**JOINT STIPULATION OF FACTS & EXHIBITS**

The Parties stipulate to the following facts and to the admissibility of the following exhibits. Matters contained in exhibits but not expressly discussed in a stipulation are part of the record and may be cited by the Parties. By stipulating to the admission of an exhibit, the Parties do not thereby concede the weight it should be given by the Court.

**I. PARTIES**

**A. *Wise and Healey Plaintiffs***

1. The Parties stipulate to the admission of Plaintiffs' Exhibits (PX) 1-20, which are affidavits setting forth certain biographical facts about each Plaintiff.

2. Incorporating the facts stipulated to by the Parties and admitted into evidence as PX 1-4, Plaintiffs Terrence Wise, Aimee Riederer Gromowsky, Cynthia Wrehe, and Cynthia Kay

Lakin are all U.S. citizens and taxpayers who reside in and are registered to vote in Missouri. Each of these plaintiffs is a qualified voter pursuant to Article VIII, § 2 of the Missouri Constitution. Each of these plaintiffs voted in the 2022 and 2024 general elections and intend to vote in future congressional elections and in other elections in which they are eligible to vote. Under the congressional maps enacted in 2022 and 2025, each of these plaintiffs previously resided, and will reside, in the districts articulated in their admitted affidavits.

3. Incorporating the facts stipulated to by the Parties and admitted into evidence as PX 5-20, Plaintiffs Elizabeth Healey, Giselle Anatol, Marques Bussey, Mary Sapp, Louie Wright, Sarah Beagle, Kyle Heard, Tom Self, Janet Sorrells, Margaret Wolf Freivogel, Sorin Nastasia, Morton Todd, Colleen Coble, Beverly Rollings, Lane Nichols-Elliott, and Randal McCallian are all U.S. citizens and taxpayers who reside in and are registered to vote in Missouri. Each of these plaintiffs is a qualified voter pursuant to Article VIII, § 2 of the Missouri Constitution. Each of these plaintiffs voted in the 2022 and 2024 general elections and intends to vote in future congressional elections and in other elections in which they are eligible to vote. Under the congressional maps enacted in 2022 and 2025, each of these plaintiffs previously resided, and will reside, in the districts articulated in their admitted affidavits.

### **C. Defendants**

4. Defendant Secretary of State Denny Hoskins serves as the state's chief election officer. His duties with regard to elections in Missouri are defined by art. IV, § 18 of the Missouri Constitution and §§ 28.035, 115.136, 115.353, 115.387, 115.401, 115.511, RSMo.<sup>1</sup>

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<sup>1</sup> Unless otherwise noted, all statutory citations are to Revised Statutes of Missouri (2016), as updated, and all Rule references are to Missouri Supreme Court Rules, as updated.



5. Defendant Hoskins's office transmits a shapefile of new redistricting plans to local election authorities ("LEAs"), including congressional redistricting plans, after they are enacted.

6. LEAs are responsible for the administration of all local, state, and federal elections within their jurisdiction, including congressional elections. §§ 115.023, 115.043.

7. LEAs are responsible for implementing districting plans, including congressional districts within their jurisdiction, by assigning voters to the correct electoral districts and distributing ballots reflecting the correct candidates for each district.

8. Pursuant to §§ 115.015, 115.027, and 115.045, Defendant Jackson County Board of Election Commissioners ("JCEB"), Defendants Michael K. Whitehead, Henry R. Carner, Colleen M. Scott and Lyle K. Querry as commissioners of the JCEB, and Defendants Tammy Brown and Sarah Zorich as directors of the JCEB, collectively serve as the LEAs for the areas of Jackson County outside of the municipality of Kansas City (collectively to be referred to as the "JCEB Defendants").

9. The JCEB Defendants are responsible for the administration of all elections in the JCEB's jurisdiction, including congressional elections. Their responsibilities are defined by §§ 115.023, 115.043, 115.023, 115.113, 115.115, 115.079, 115.099, 115.127, 115.163, 115.247, 115.389, 115.393, 115.499, and 115.507.

10. The JCEB is responsible for implementing new districting boundaries in the jurisdiction for which the JCEB is responsible. This requires reassigning voters to new districts as necessary in the Missouri Centralized Voter System ("MCVR"). This reassignment of voters in MCVR typically occurs when there is not an election cycle in progress. An election cycle is considered in progress from 10 weeks prior to election day through to two weeks after election day when that election's results are certified (or later in the case of a recount).

11. Pursuant to §§ 115.015, 115.027, and 115.045, Defendant Kansas City Board of Election Commissioners (“KCEB”), Defendants Sarah Miller, Sharon Turner Buie, and Ralph F. Munyan II as commissioners of the KCEB, and Defendants Shawn Kieffer and Lauri Ealom as directors of the KCEB, collectively serve as the LEAs for the jurisdiction that includes the municipality of Kansas City within Jackson County (collectively referred to as the “KCEB Defendants”).

12. The KCEB Defendants are responsible for the administration of all elections in the municipality of Kansas City within Jackson County, including congressional elections. Their responsibilities are defined by §§ 115.023, 115.043, 115.023, 115.113, 115.115, 115.079, 115.099, 115.127, 115.163, 115.247, 115.389, 115.393, 115.499, and 115.507.

13. The KCEB is responsible for implementing new districting boundaries in the jurisdiction for which the KCEB is responsible. This requires reassigning voters to new districts as necessary in the MCVR. This reassignment of voters in MCVR typically occurs when there is not an election cycle in progress. An election cycle is considered in progress from 10 weeks prior to election day through to two weeks after election day when that election’s results are certified (or later in the case of a recount).

14. As of January 13, 2026, JCEB and KCEB have not reassigned any voters in MCVR to new districts based on the 2025 Map.

### **C. Intervenor-Defendant**

15. Intervenor Missouri Republican State Committee is the duly established state committee of the Missouri Republican Party pursuant to § 115.603.

16. The Missouri Republican State Committee has been selected and serves in the role of representing and acting for the Missouri Republican Party in the interim between party conventions pursuant to § 115.605.

17. The Missouri Republican Party maintains “a congressional district committee for each congressional district in the state,” § 115.603.

18. The Missouri Republican Party has substantial interests in securing the election of Republican candidates to the U.S. House of Representatives, educating and turning out voters to support Republican candidates for those offices, and the expenditure of its own resources to carry out those activities.

## **II. BACKGROUND ON REDISTRICTING & CENSUS**

19. The U.S. Census Bureau conducts a census every ten years.

20. One purpose of this decennial census is to determine population for federal congressional apportionment.

21. In 2020, the U.S. Census Bureau conducted the 2020 Census.

22. On April 26, 2021, the U.S. Census Bureau released congressional apportionment results based on the 2020 Census indicating that Missouri was entitled to eight U.S. house representatives and certified this result to the Governor of Missouri.

23. On August 12, 2021, the U.S. Census Bureau released the 2020 Census redistricting data files (commonly known as the P.L. 94-171 data), which contain the detailed population tabulations used for redistricting.

24. The U.S. Census Bureau tabulates population and demographic data at various geographic levels, including, *inter alia*, blocks, block groups, tracts, places, counties, and voting districts (also known as voting tabulation districts or VTDs).

25. The U.S. Census Bureau produces geographic information files known as Tiger/Line shapefiles, which set out the boundaries for each geographic unit at each geographic level in each state.

26. The U.S. Census Bureau assigns each geographic unit a unique alphanumeric identifier called a geographic identifier or GEOID.

27. Blocks are the smallest geographic area at which the U.S. Census Bureau tabulates population and demographic data; all other census geographies are comprised of whole blocks.

28. Places are census-defined geographic areas that generally correspond to incorporated cities, towns, and villages (collectively, “municipalities”). Places also include other “census-designated places,” which do not correspond to incorporated municipalities.

29. VTDS are census-defined geographic areas that generally correspond to election precincts.

30. According to the 2020 Census, Missouri’s total population is 6,154,913.

31. Because Missouri has eight congressional districts, to make districts as nearly equal in population as possible, the ideal district population is 769,364, with one district containing 769,365 people.

### III. MISSOURI’S 2022 CONGRESSIONAL REDISTRICTING

32. On May 11, 2022, the Missouri General Assembly passed a congressional map drawn based on 2020 census data in House Bill 2909 (2022) (“H.B. 2909”).

33. On May 18, 2022, H.B. 2909 was approved by the Governor and delivered to the Secretary of State.

34. On May 13, 2022, an electronic file representing the district boundaries for the 2022 Congressional Map was transmitted by the Director of Elections for the Secretary of State to LEAs for use in upcoming elections.

35. The 2022 Congressional Map was used to elect the state's congressional delegation in the 2022 and 2024 primary and general elections.

36. In 2022, the primary election to elect congressional representatives took place on August 2 and the general election took place on November 8.

37. The first day for candidate filing in 2022 for the August 2 primary election was February 22 and the last day for candidate filing was March 29.

38. The "final certification date" refers to the tenth Tuesday before an election, or the date by which the Secretary of State must formally notify election authorities responsible for conducting the election of the election, pursuant to § 115.125.

39. The final certification date for the August 2, 2022 primary election was May 24, 2022.

40. The final certification date for the November 8, 2022 general election was August 30, 2022.

41. In 2024, the primary election to elect congressional representatives took place on August 6 and the general election took place on November 5.

42. The first day for candidate filing in 2024 for the August 6 primary election was February 27 and the last day for candidate filing was March 26.

43. The final certification date for the August 6, 2024 primary election was May 28, 2022.

44. The final certification date for the November 5, 2024 general election was August 27, 2024.

45. There is no requirement in Missouri that a congressional candidate reside in the congressional district the candidate seeks to represent.



46. In 2022 and 2024, CD 5 voters reelected incumbent Democratic Rep. Emmanuel Cleaver to represent their district.

47. Rep. Cleaver has represented CD 5 since he was first elected to Congress in 2004.

48. In 2022, CD 4 voters elected Republican Rep. Mark Alford and reelected him to represent their district in 2024.

49. In 2022 and 2024, CD 6 voters reelected incumbent Republican Rep. Sam Graves to represent their district.

50. In both 2022 and 2024, Republican candidates prevailed in six of the eight congressional districts (CDs 2, 3, 4, 6, 7, and 8), while Democratic candidates prevailed in CDs 1 and 5.

#### **IV. MISSOURI'S 2025 CONGRESSIONAL REDISTRICTING**

51. On August 29, 2025, Governor Kehoe issued a Proclamation calling an extraordinary session of the General Assembly. The proclamation identified congressional redistricting as one of the reasons for calling the extraordinary session.

52. Along with the Proclamation, the Governor released a congressional map he called the "Missouri First Map."

53. On September 3, 2025, Rep. Dirk Deaton introduced the Missouri First Map as H.B. 1.

54. On September 4, 2025, the House Special Committee on Redistricting held a public hearing on H.B. 1.

55. On September 5, 2025, the House Legislative Rules Committee held a public hearing on H.B. 1 and advanced the map out of committee by a majority vote.

56. On September 8, 2025, the floor debate for H.B. 1 began and was reported 'do pass' to the Missouri House of Representatives.

57. The Missouri House of Representatives passed H.B. 1 on September 9, 2025.
58. On September 11, 2025, the Senate Committee on Local Government, Elections, and Pensions held a public hearing on H.B. 1 and advanced the map out of committee by a majority vote.
59. On September 12, 2025, H.B. 1 was reported 'do pass' to the Senate and was passed by the Senate.
60. On September 28, 2025, Governor Kehoe signed H.B. 1 into law.
61. In 2026, the primary election to elect congressional representatives in Missouri is scheduled for August 4.
62. In 2026, the general election is scheduled for November 3.
63. The first day for candidate filing in 2026 for the August 4 primary election is February 24 and the last day for candidate filing is March 31.
64. The final certification date for the August 4, 2026 primary election is May 26, 2026.
65. The final certification date for the November 3, 2026 general election is August 25, 2026.
66. In 2026, municipal election day is scheduled for April 7, 2026.
67. The final certification date for the April 7, 2026 municipal election is January 27, 2026.
68. Pursuant to § 115.507, the deadline for announcement and certification of the election results for municipal elections taking place on April 7 is the second Tuesday thereafter, April 21, 2026.

**V. STIPULATED FACTS CONCERNING CONGRESSIONAL MAPS**

69. CD 4 under either the 2022 Congressional Map or the 2025 Congressional Map is not a district required to be created under Section 2 of the Voting Rights Act of 1965 (“VRA”) to provide a racial minority group with requisite opportunity to elect candidates of choice.

70. CD 5 under either the 2022 Congressional Map or the 2025 Congressional Map is not a district required to be created under Section 2 of the VRA to provide a racial minority group with requisite opportunity to elect candidates of choice.

71. CD 6 under either the 2022 Congressional Map or the 2025 Congressional Map is not a district required to be created under Section 2 of the VRA to provide a racial minority group with requisite opportunity to elect candidates of choice.

72. No court has ruled that any district in the 2022 Congressional Map was in violation of the VRA.

73. No court has ruled that any district in the 2022 Congressional Map was in violation of the Equal Protection Clause of the U.S. Constitution.

74. The boundary line between Senate District 7 and Senate District 9 runs down the same portion of Troost Avenue as the boundary line between the 2025 Congressional Map’s District 5 and District 4.

75. The boundary line between Senate District 7 and Senate District 9 shifts west from Troost Avenue to Holmes Road at the same point that the 2025 Congressional Map shifts west from Troost Avenue to Holmes Road.

76. The 2022 Congressional Map does not include all of the Clay County section of Kansas City in CD 5.

77. Portions of the City of Kansas City were located within CDs 4, 5, and 6 under the 2022 Congressional Map.

78. Portions of Jackson County were located within CDs 4, 5, and 6 under the 2022 Congressional Map.

## **VI. VOTING TABULATION DISTRICT (VTD) KC 811**

79. There are two VTDs within Kansas City named “KC 811” by the U.S. Census Bureau.

80. The two VTDs named “KC 811” are not contiguous.

81. One of the VTDs named “KC 811” has a GEOID from the 2020 Census of 29095K16811.

82. The VTD named “KC 811” with a GEOID from the 2020 Census of 29095K16811 has a total population of 32.

83. The VTD named “KC 811” with a GEOID from the 2020 Census of 29095K16811 is bounded by a portion of Rockhill Road, by a portion of East 69th Street, and by a portion of Oak Street.

84. The second VTD named “KC 811” has a GEOID from the 2020 Census of 29095000484.

85. The VTD named “KC 811” with a GEOID from the 2020 Census of 29095000484 has a total population of 843.

86. The VTD named “KC 811” with a GEOID from the 2020 Census of 29095000484 is bounded by a portion of East 70th St., by a portion of Troost Avenue, by a portion of East 75th St., and by a portion of Holmes Rd.

87. The bill text of H.B. 1 states that “The fourth congressional district shall be composed of” several geographic units including “VTD: KC 811.”

88. The bill text of H.B. 1 states that “The fifth congressional district shall be composed of” several geographic units including “VTD: KC 811.”

89. The bill text of H.B. 1 does not refer to geographic units by their GEOID.

90. Defendant Hoskins’s office provided the shapefiles for the 2025 Congressional Map to LEAs.

91. The shapefiles were also accessible online in advance of Defendant Hoskins’s official transmission to LEAs.

92. The shapefile assigns “KC 811” with a GEOID from the 2020 Census of 29095K16811 to District 4.

93. CD 4 in the shapefile is contiguous and equi-populous with other Missouri congressional districts.

94. The shapefile assigns “KC 811” with a GEOID from the 2020 Census of 29095000484 to District 5.

95. CD 5 in the shapefile is contiguous and equi-populous with other Missouri congressional districts.

## **VI. EXPERT WITNESSES**

96. The Parties stipulate to the admission of all expert reports exchanged in this case for all experts who will be called to testify, which include the following exhibits:

- a. PX 21 - Expert Report of Dr. Ari Stern (amended 12/30/2025)
- b. PX 22 - Rebuttal Expert Report of Dr. Ari Stern (1/14/2026)
- c. PX 23 - Expert Report of Dr. Jonathan Cervas (amended 12/30/2025)
- d. PX 24 - Rebuttal Expert Report of Dr. Jonathan Cervas (1/14/2026)
- e. PX 25 - Expert Report of Dr. John Cromartie (12/22/2025)
- f. PX 26 - Rebuttal Expert Report of Dr. John Cromartie (1/14/2026)



- g. PX 27 - Expert Report of Dr. Jonathan Rodden (12/22/2025)
- h. PX 28 - Rebuttal Expert Report of Dr. Jonathan Rodden (1/14/2026)
- i. DX 101 - Expert Report of Dr. Sean P. Trende (1/7/2026)
- j. IX 201 - Expert Report of Dr. M.V. Hood III (1/6/2026)

97. The Parties stipulate to the following expert qualifications:

- a. Dr. Ari Stern is qualified as an expert in applied and computational mathematics, redistricting, and ensemble analysis.
- b. Dr. Jonathan Cervas is qualified as an expert in political science, redistricting, drawing redistricting maps, and census data.
- c. Dr. John Cromartie is qualified as an expert in population geography, rural demography, and urban-rural classification.
- d. Dr. Jonathan Rodden is qualified as an expert in redistricting; political economic, and social geography; applied statistics; geographic information systems; political science; and quantitative methods.
- e. Dr. M.V. Hood is qualified as an expert in American politics, redistricting, and quantitative political science.
- f. Dr. Sean Trende is qualified as an expert in American politics with an emphasis on elections, redistricting, and political methodology, as well as redistricting simulations.

Dated: February 11, 2026

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*Attorneys for State Defendants.*

### **Certificate of Service**

I hereby certify that a true and correct copy of the above and foregoing document was filed and served electronically on all counsel of record via the Court's e-filing system on February 11, 2026.

/s/ Gillian R. Wilcox

**Expert Report of Sean P. Trende, Ph.D.**

***Wise v. State, 2516-CV29597 (Circuit Court of Jackson County, Missouri)***

**January 7, 2026**

DEFENDANT'S  
EXHIBIT

**DX 101**

## **I. Introduction.**

My name is Sean P. Trende. I am over 18 years of age and I hold a Ph.D. in Political Science. I have been retained by the Attorney General of Missouri on behalf of their clients in the above-captioned matter. I am being compensated at a rate of \$500/hr. My compensation is in no way dependent upon the conclusions I reach. All opinions are offered to a reasonable degree of scientific certainty.

## **II. Qualifications**

### **A. Professional Experience**

I serve as Senior Elections Analyst for Real Clear Politics. I joined Real Clear Politics in January of 2009 and assumed a fulltime position in March of 2010. Real Clear Politics is a company of approximately 50 employees, with its main offices in Washington D.C. It produces one of the most heavily trafficked political websites in the world, which serves as a one-stop shop for political analysis from all sides of the political spectrum and is recognized as a pioneer in the field of poll aggregation. Real Clear Politics produces original content, including both data analysis and traditional reporting.

My main responsibilities with Real Clear Politics consist of tracking, analyzing, and writing about elections. I collaborate in rating the competitiveness of Presidential, Senate, House, and gubernatorial races. As a part of carrying out these responsibilities, I have studied and written extensively about demographic trends in the country, exit poll data at the state and federal level, public opinion polling, and voter turnout and voting behavior. In particular, understanding the way that districts are drawn and how geography and demographics interact is crucial to predicting United States House of Representatives races, so much of my time is dedicated to that task.



I am currently a Visiting Scholar at the American Enterprise Institute, where my publications focus on the demographic and coalitional aspects of American Politics.

I am also a Lecturer at The Ohio State University. My course load is detailed in my c.v., attached as Exhibit 1.

## **B. Publications and Speaking Engagements**

I am the author of the 2012 book *The Lost Majority: Why the Future of Government is up For Grabs and Who Will Take It*. In this book, I explore realignment theory. It argues that realignments are a poor concept that should be abandoned. As part of this analysis, I conducted a thorough analysis of demographic and political trends beginning in the 1920s and continuing through modern times, noting the fluidity and fragility of the coalitions built by the major political parties and their candidates.

I also co-authored the 2014 *Almanac of American Politics*. The *Almanac* is considered the foundational text for understanding congressional districts and the representatives of those districts, as well as the dynamics in play behind the elections. My focus was researching the history of and writing descriptions for many of the 2012 districts, including tracing the history of how and why they were drawn the way that they were drawn. Because the 2014 *Almanac* covers the 2012 elections, analyzing how redistricting was done was crucial to my work. I have also authored a chapter in Dr. Larry Sabato's post-election compendium after every election dating back to 2012.

I have spoken on these subjects before audiences from across the political spectrum, including at the Heritage Foundation, the American Enterprise Institute, the CATO Institute, the Bipartisan Policy Center, and the Brookings Institution. In 2012, I was invited to Brussels to speak about American elections to the European External Action Service, which is the European Union's diplomatic corps. I was selected by the United States Embassy in Sweden to discuss the 2016

elections to a series of audiences there and was selected by the United States Embassy in Spain to fulfill a similar mission in 2018. I was invited to present by the United States Embassy in Italy, but was unable to do so because of my teaching schedule.

### **C. Education**

I received my Ph.D. in political science at The Ohio State University in 2023. I passed comprehensive examinations in both Methodology and American Politics. My dissertation applied historical and spatial statistical approaches to analyzing American political institutions, including (1) an analysis of Supreme Court voting patterns from 1900 to 1945; (2) methodological development in the use of integrated nested LaPlace approximations (INLA) to incorporate spatial statistics into election analysis; and (3) simulation-based evaluation of “communities of interest” in redistricting. In pursuit of this degree, I also earned a Master’s Degree in Applied Statistics. My coursework for my Ph.D. and M.A.S. included, among other things, classes on G.I.S., spatial statistics, issues in contemporary redistricting, machine learning, non-parametric hypothesis tests and probability theory. I also earned a B.A. from Yale University in history and political science in 1995, a Juris Doctor from Duke University in 2001, and a Master’s Degree in political science from Duke University in 2001.

In the winter of 2018, I taught American Politics and the Mass Media at Ohio Wesleyan University. I taught Introduction to American Politics at The Ohio State University for three semesters from Fall of 2018 to Fall of 2019, and again in Fall of 2021. In the Spring semesters of 2020, 2021, 2022 and 2023, I taught Political Participation and Voting Behavior at The Ohio State University. This course spent several weeks covering all facets of redistricting: how maps are drawn, debates over what constitutes a fair map, measures of redistricting quality, and similar topics. It also covers the Voting Rights Act and racial gerrymandering claims. I also taught survey

methodology in Fall of 2022 and Spring of 2024. In Spring of 2025 I taught Introduction to the Policy Process. In Spring of 2026 I will teach American Government Culture and Behavior.

#### **D. Prior Expert Engagements**

A full copy of all cases in which I have testified or been deposed is included on my C.V., attached as Exhibit 1. In 2021, I served as one of two special masters appointed by the Supreme Court of Virginia to redraw the districts that will elect the Commonwealth's representatives to the House of Delegates, state Senate, and U.S. Congress in the following decade. The Supreme Court of Virginia accepted those maps, which were praised by observers from across the political spectrum. *See, e.g., New Voting Maps, and a New Day, for Virginia*, The Washington Post (Jan. 2, 2022), available at <https://www.washingtonpost.com/opinions/2022/01/02/virginia-redistricting-voting-maps-gerrymander/>; Henry Olsen, *Maryland Shows How to do Redistricting Wrong. Virginia Shows How to Do it Right*, The Washington Post (Dec. 9, 2021), available at <https://www.washingtonpost.com/opinions/2021/12/09/maryland-virginia-redistricting/>; Richard Pildes, *Has VA Created a New Model for a Reasonably Non-Partisan Redistricting Process*, Election Law Blog (Dec. 9, 2021), available at <https://electionlawblog.org/?p=126216>.

In 2019, I was appointed as the court's expert by the Supreme Court of Belize. In that case I was asked to identify international standards of democracy as they relate to malapportionment claims, to determine whether Belize's electoral divisions (similar to our congressional districts) conformed with those standards, and to draw alternative maps that would remedy any existing malapportionment.

I served as a Voting Rights Act expert to counsel for the Arizona Independent Redistricting Commission in 2021 and 2022.

I also served as an expert in *Faatz v. Ashcroft*, a Missouri redistricting case involving a compactness challenge to the Missouri State Senate boundaries.

### **III. Overview of Terms**

Academics often casually deploy jargon in a way that can confuse readers who do not typically employ such jargon. Such is potentially the case with the discussion of compactness measures and census geographies in this case. To help avoid this, I open with an explanation of compactness measures and of census geographies.

#### **A. Compactness**

Plaintiffs' experts discuss two commonly used compactness measures in their reports: Reock and Polsby-Popper. I add two more: Convex Hull and "IKIWIST" scores. These are probably the most commonly used compactness measures. But importantly, they are but a sample of dozens of metrics that have been proposed over the years. *See, e.g.*, <https://alarm-redist.org/redistmetrics/articles/compactness.html> (listing various measures). In other words, there is no one "compactness" measure. Rather, different measures emphasize different aspects of what we might consider "compact." It is also important to understand that these scores can vary somewhat based upon the projection employed and the amount of detail in the shapefile employed.

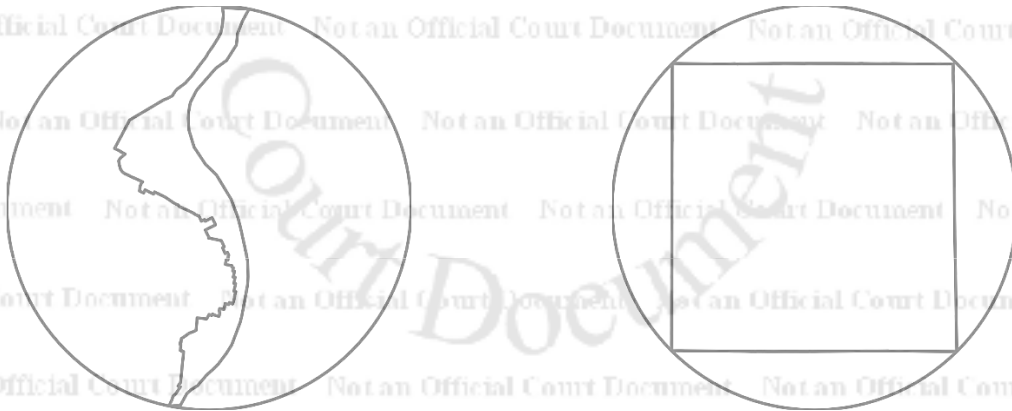
#### **1. Reock Score**

The first measure is the Reock score. It is the first measure discussed here, but it was also among the first numeric measures of compactness developed. Ernest C. Reock, Jr., *A Note: Measuring Compactness as a Requirement of Legislative Apportionment*, 5 *Midwest J. Pol. Sci.* 70 (1961). In lay terms, we might imagine the smallest circle that wholly encloses the district without cutting it, called the "minimum bounding circle." The Reock score is the percentage of that circle that the district would fill, expressed as a decimal. Were a district perfectly circular, it

would fill 100% of that minimum bounding circle, and the Reock score would be 1. Were a district somehow a line segment, it would fill 0% of that district, and the Reock score would be 0.

In practical terms, Reock scores measure how distended a district is. Elongated districts tend to have low Reock scores, while districts with high Reock scores tend to be, for lack of a better word, “stocky.” To help illustrate this (and other measures) I examine districts in the 2022 Missouri House plan, and compare the least compact district according to Reock among the various districts (District 76, with a score of 0.1419) as well as the most compact (District 157, with a score of 0.6181). I select the Missouri House plan because it has a large number of districts, and therefore offers a wider range of potential contrasts to illustrate the various measures.

Fig. 1: Districts with Minimum Bounding Circles



The district on the left has a Reock score of 0.1419, which means that it fills 14.9% of the circle that surrounds it. The district on the right has a Reock score of 0.6181, meaning that it fills 61.8% of the circle that surrounds it. One can readily see that the district on the right “fills” a higher percentage of its minimum bounding circle than the district on the left. This is what a Reock score measures; an opinion that relies upon a Reock score is relying upon the percentage of a particular circle that a district would fill.

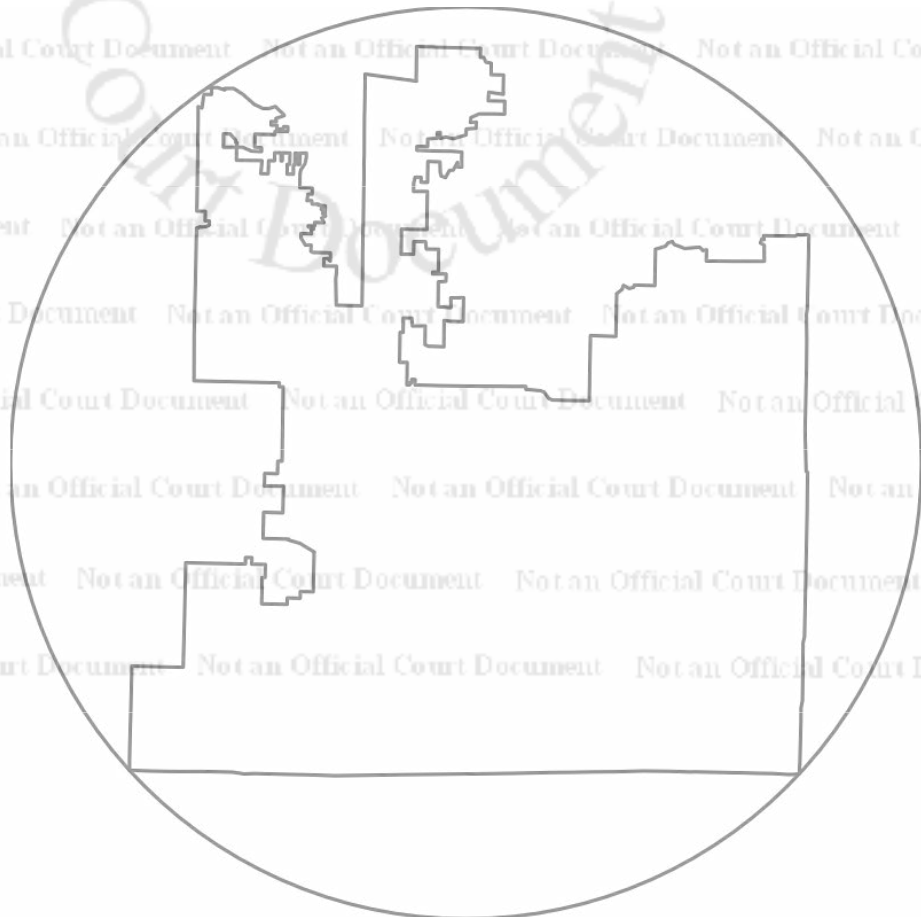
In practice, Reock scores measure how “stocky” a district is.



## 2. Polsby-Popper Score

Reock scores do have real limitations for redistricting purposes. One can imagine a circular district, which would have a Reock score of 1. Now imagine a map maker carves out a narrow, serpentine channel running into the center of the district. The district would still fill a large portion of the Minimum Bounding Circle, and thus would score well on the compactness score. Likewise, a district covered with small protrusions, like potato eyes, could nevertheless score well on Reock scores, even though such inlets and protrusions might signify a gerrymander or be identified by laypeople as not compact. As an illustration of this, consider State House District 33, which is not terribly visually pleasing. Yet it would fill its minimum bounding circle nicely, giving it a respectable Reock score of 0.4795.

Fig. 2: State House District 33, With Minimum Bounding Circle

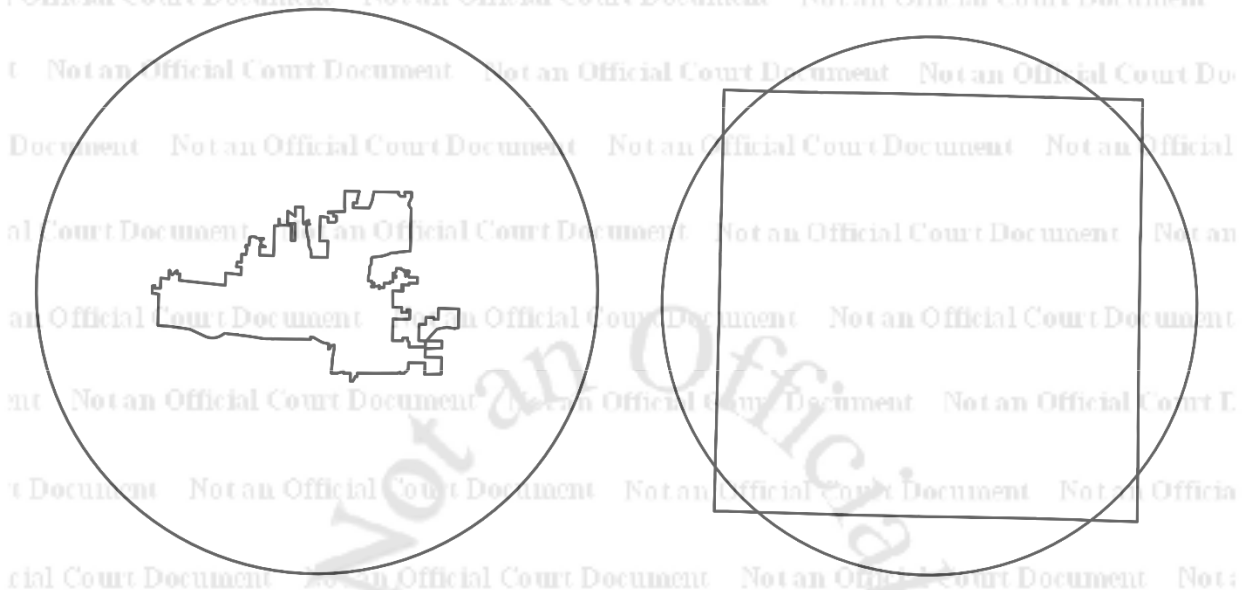


Polsby-Popper scores help to address this. In lay terms, imagine taking a circle and then “unfolding” it without breaking it, until it is shaped into a circle. That circle would have the same perimeter as the district. The Polsby-Popper score is the percentage of such a circle (i.e. a circle with the same perimeter as the district) that such a district would fill. Daniel D. Polsby & Robert D. Popper, The Third Criterion: Compactness as a Procedural Safeguard Against Partisan Gerrymandering, 9 Yale L. & Pol’y Rev. 301 (1991).

Practically speaking, a “smoother” district will have a higher Polsby-Popper score, while a district with many “arms and inlets” will have lower Polsby-Popper scores. Once again, a perfectly circular district would have no arms and inlets, so its area would be the same as that of a circle with the same perimeter; it would fill 100% of the circle and would receive a Polsby-Popper score of one. As more and more “bends” are added to the district, its perimeter will increase, and it will fill less and less of the circle with the same perimeter as the district.

To help illustrate this, compare the least compact contiguous district using Polsby-Popper among the various districts here (District 46, 0.105, below left) with the most compact (District 157, 0.7742, below right). Thus, District 46 fills 10.5% of the circle with the same perimeter; this makes sense because it is fairly irregular. District 157, on the other hand, fills 77.42%.

Fig. 3: State House Districts, with Circle of Same Perimeter



Again, the basic intuition of what would be the more compact district holds here, with the district on the right looking considerably more compact than the district on the left. What makes it so in this test is the many folds in the district on the left inflate its perimeter, creating a larger circle that it is less able to fill.

Thus, we can see that the Polsby-Popper score measures the “arms and inlets” in a district. Note that this too can generate counterintuitive results: An oval running down the Florida Peninsula might have poor compactness under Reock, but score quite well under Polsby-Popper.

This approach has limitations as well. Polsby-Popper scores can be sensitive to features that mapmakers are directed to follow. For example, river boundaries tend to meander, which can increase the perimeter of a district if they are followed. At the same time, mapmakers are often instructed to follow natural features, such as river boundaries. Thus, a mapmaker who forms a district boundary out of precincts drawn by straight lines and who avoids precincts that follow river boundaries would be rewarded with a higher Polsby-Popper score.

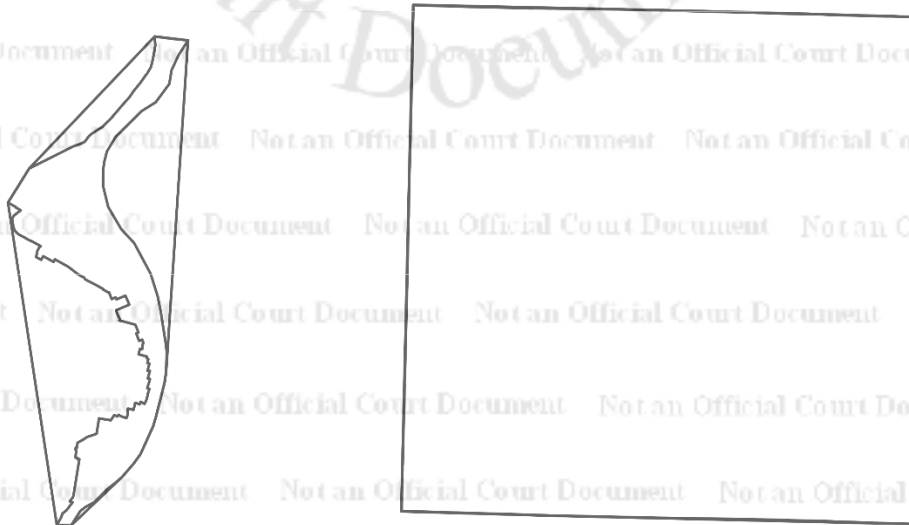
Likewise, some states have very regular edges – think Colorado – while other states have irregular coastlines – think Maine. Districts that respect those shorelines will have more “arms and inlets” and therefore higher perimeters simply by virtue of state geography, and their Polsby-Popper scores will suffer.

### 3. Convex Hull Score

A researcher may also reasonably wonder “what is so great about circles?” Convex Hull scores seek to dispense with circles altogether and instead look at the area of a convex polygon that would enclose a district. A more straightforward way to think of this is to imagine a rubber band snapped around a district. The Convex Hull score would ask what percentage of that rubber band the district would fill.

We once again illustrate this by comparing the least compact district in our dataset – again District 76 with a score of 0.405, with District 157, which has a Convex Hull score of 0.997.

Fig. 4: State House Districts with Convex Polygon



Once again we can see how the more compact district fills a much larger percentage of the shape “rubber-banded” around the district – in this case it is a square, and the rubber band would almost perfectly encompass it, when compared to the percentage of the less-compact district using Convex Hull.

As with all of these attempts to quantify the notion of “compactness,” the Convex Hull score has its plusses and minuses. As a plus, it is likely impossible to ever draw a perfectly circular district (although circular cities do exist throughout the South), but square counties, townships and precincts do exist. It is therefore at least possible to draw a district with a Convex Hull score of 1 while adhering to traditional redistricting principles. At the same time, as is the case with Polsby-Popper scores, a badly distended district can score well on Convex Hull scores; imagine a largely rectangular district that spanned the entire Colorado/Wyoming border.

#### 4. IKIWISI Scores

The final metric we examine is a newer one, developed by political scientists Aaron Kaufman, Gary King and Maya Komisarchik. Rather than directly developing a mathematical formula for measuring compactness, they instead interviewed judges, redistricting experts, public officials, lawyers and ordinary citizens by showing them various districts, in order to get a sense of what they would consider “valid.” Kaufman, Aaron, et al., “How to Measure Legislative Compactness if You Only Know it When You See it,” 65 *Am. Jrnl. Pol. Sci.* 533, 534 (2021). They find that the groups effectively define compactness in the same way, which they summarize as “squarish, with minimal arms, pockets, islands, or jagged edges.” *Id.* at 544. They turn these into what they (unfortunately) call “I Know it When I See It” scores. These scores run from 1 to 100. Because they are whole numbers, there can be multiple districts with identical IKIWISI scores. The least compact district is again District 76, while a number of districts score a perfect IKIWISI



score, including District 157.

## B. Census Geographies

As with compactness scores, it may be helpful to have a brief refresher on census geographies. The US Census Bureau reports data at multiple levels of data collection. The largest grouping is obviously at the national level, but the data are further broken down at the state level, and then to the county level.

Counties are then further broken down into census tracts. Jackson County, MO has 227 census tracts with a mean population of around 3,200 residents. We can see these in the following illustration:

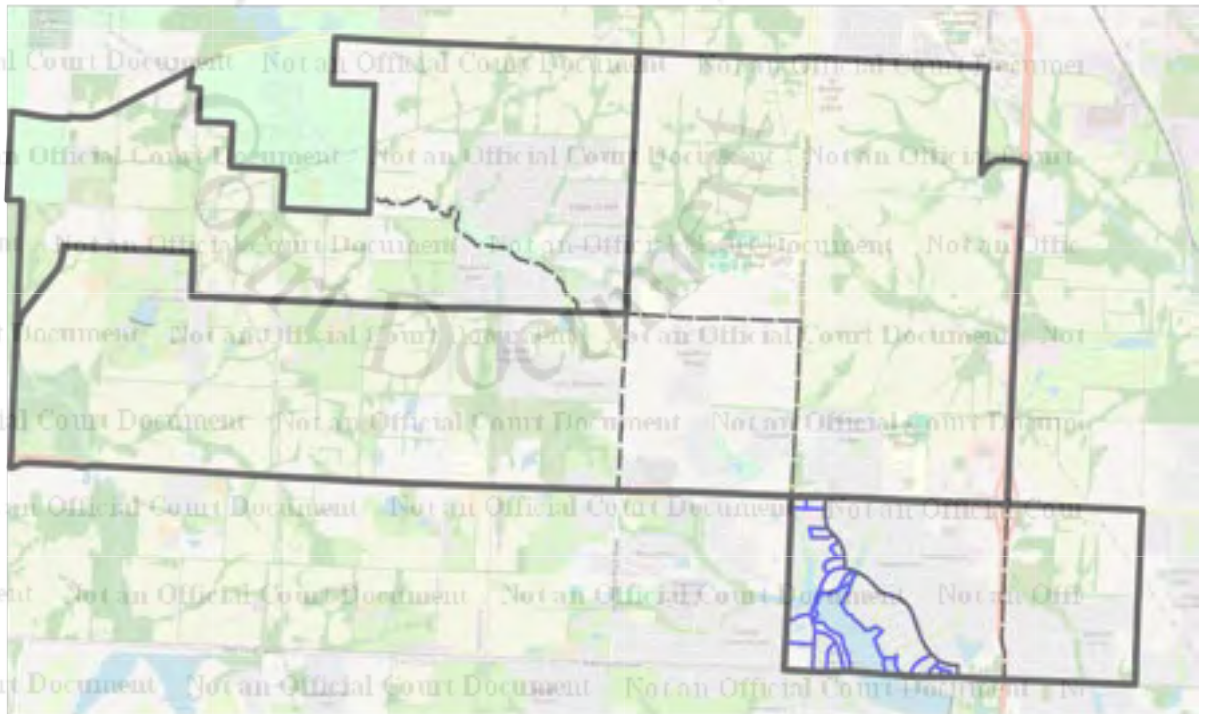
Fig. 5: Census Tracts in Jackson County, MO.



Census tracts are then divided into block groups; there are 640 in Jackson County. The average block group in Jackson County contained 1,200 residents. Finally, block groups are divided into census blocks, of which there are around 15,000 in DeSoto County.

To help illustrate this better, the following map is Tracts 013504, 018102, and 018200 in southern Jackson County. The tracts are broken up into their block groups, denoted by dashed lines. Block group 3 of Tract 018101 is broken up into its constituent blocks, denoted by blue lines.

Fig. 6: Tracts 013504, 018102, and 018200, with further subdivisions.



Blocks are something of the “quarks” of the census world. They will usually line up with the boundaries of cities, towns, and the census version of precincts: Voting Tabulation Districts, or

VTDs. They will often line up with precincts lines as well. Precincts and VTDs will not, however, always line up with block groups, tracts, or even cities.

Each of these units comes with its own unique identifier, known as a GEOID. These GEOIDs are typically a combination of other census identifiers. So, for example, the GEOID for Tract 013707 is 29095013707, which means that it is in state 29 (the identifier for Missouri) in county 095 (the identifier for Jackson County), and is tract 013707. These units will also sometimes have census names; the name for this tract is Census Tract 137.07.

#### **IV. Contiguity Analysis**

First, I have been asked to respond to Dr. Cervas' conclusions about H.R. 1's Legislative Text. Dr. Cervas concludes that "[i]n this circumstance, H.B. 1 should have either uniquely identified the VTDs or specified which census blocks comprising the VTDs belong in CD 4 and which belong in CD 5" and that it is left "to election officials' discretion where the voters who live in these VTDs will ultimately be assigned." Cervas Report at 25-26. He also notes that a double assignment of VTDs leaves districts 4 and 5 overpopulated and non-contiguous.

I do not know what best bill drafting practices in Missouri are, nor do I know whether the bill as drafted leaves it to election officials' discretion where voters who live in these VTDs will be assigned, nor do I know what Missouri canons of statutory construction would apply under these circumstances. This seems like classic legal analysis that lawyers would fight about and courts should decide.

What Dr. Cervas and I do agree about, though, is that these are two separate VTDs within Jackson County that (unfortunately, in my view) share a label. One of these has a GEOID from the 2020 census of 29095K16811 and is bounded by a portion of Rockhill Road, by a portion of East 89th St., and by a portion of Oak Street. It has a population of 32. The second VTD has a GEOID

from the 2020 census of 29095000484 and is bounded by a portion of East 70th St., by a portion of Troost St., by a portion of East 75th St., and by a portion of Holmes Rd. It has a population of 843.

Dr. Cervas notes that if both VTDs are assigned to CD4, it would have 843 too many people, and if both VTDs are assigned to CD5, it would have 32 people too many. We also agree that in both of these circumstances, the district would be non-contiguous.

What Dr. Cervas does not discuss is the following scenario: If the VTD with the GEOID of 29095K16811 is assigned to District 4, District 4 would be rendered contiguous and equipopulous with other Missouri districts. Likewise, if the VTD with the GEOID of 29095000484 is assigned to District 5, the district would be contiguous and equipopulous with other Missouri districts.

Again, whether election officials would actually have discretion to prescribe a different outcome given this possibility is legal argumentation that falls well beyond the scope of what I am comfortable testifying to. Likewise, whether Missouri canons of statutory construction exist to avoid assigning these VTDs to two districts is not something I can opine on to any reasonable degree of scientific certainty.

## **V. Analysis of Enacted Map.**

Plaintiffs' experts offer up a dizzying array of maps and various potential considerations for a map drawer (some of which are fairly novel) suggesting that a more compact version of the existing map could potentially be drawn. That it can be done is not particularly surprising. There exist an incomprehensible number of potential maps. Even a simple 10x10 grid features 8 quintillion potential arrangements of 10 districts; the number of arrangements for 4,604 VTDs in Missouri is much larger, even with a constraint for contiguity added. Jamie Tucker-Foltz, *How*



*Millions of Simulated Maps Can Help Us Make Electoral Districts That Feel Fair*, Yale Insights (Nov. 17, 2025), <https://insights.som.yale.edu/insights/how-millions-of-simulated-maps-can-help-us-make-electoral-districts-that-feel-fair>.

In other words, in a world of increased computing power where millions or even billions of maps can be produced in a relatively short time, it is unsurprising that more compact maps can be produced. Indeed, if *that* is the standard for what “compact and as nearly equal in population as may be” is, then it’s unclear whether a stable map can ever be achieved; more simulations and exploration will eventually discover a more compact map. That was one of the core points to which I testified in the *Faatz* litigation.

Regardless, I have been asked to determine whether other recent Missouri districts fall within the range of districts drawn in Missouri maps. To do this, I first examined the 2012, 2022, and Enacted maps to determine whether they feature districts with compactness scores that are lower, or within a point of the scores of the Enacted Map. For Reock, Polsby-Popper and IKIWISI scores, I employ the calculations from Dave’s Redistricting. For Convex Hull, I calculate the compactness in R. Using Reock scores, there are four districts in these maps that have been less compact than District 5 in the Enacted Map (0.292): District 6 in the 2012 Map (0.234), District 6 in the 2022 map (0.247), District 5 in the 2012 Map (0.261), and District 6 in the Enacted Map (0.281). In addition, District 3 in the 2012 Map (0.295) and District 3 in the 2022 map (0.3) are within a point of the Enacted Map District 5.

Using Polsby-Popper scores, District 3 in the 2022 Map (0.151), and District 4 in the 2012 Map (0.188), have lower scores than the Enacted Map District 5 (0.199). District 2 in the 2012 Map has a Polsby-Popper score within a point of the Enacted Map District 5 (0.203).



Using Convex Hull scores, District 3 in the 2022 Map (0.637), District 4 in the 2012 Map (0.677) and District 5 in the 2012 Map (0.69) have lower Convex Hull scores than District 5 in the Enacted Map (0.702).

Using IKIWISI scores, District 3 in the 2022 map (24) and District 5 in the 2012 Map (33) have lower scores than the Enacted Map District 5 (34).

In the state House map, 30 districts have Reock scores lower than or within a point of District 5 in the Enacted Map District 5. In the State Senate map, seven districts have Reock scores lower than or within a point of the Enacted Map District 5. In the State House map, 24 districts have Polsby-Popper scores lower than or within a point of District 5 in the Enacted Map District 5. In the State Senate map, that number is six. In the State House map, 49 districts have Convex Hull scores within a point of that of District 5 in the Enacted Map, while 12 state Senate districts have scores within a point. The Convex Hull Scores may be of particular interest given that legislative districts in particular are ideally shaped as certain polygons, which is captured by Convex Hull scores. Finally, in the State House map, 29 districts have IKIWISI scores lower than the Enacted Map District 5, while in the State Senate, that number is seven.

I have also been asked to provide the average compactness scores for those maps.

Table 1: Average Compactness Measures for various Missouri Maps

| Score         | 2011  | 2022  | Enacted | House | Senate |
|---------------|-------|-------|---------|-------|--------|
| Reock         | 0.396 | 0.417 | 0.413   | 0.397 | 0.396  |
| Polsby-Popper | 0.263 | 0.31  | 0.353   | 0.323 | 0.327  |
| Convex Hull   | 0.752 | 0.786 | 0.802   | 0.755 | 0.757  |
| IKIWISI       | 48.8  | 57.2  | 63      | 54.1  | 54     |

In short, this does not suggest that Enacted Map District 5 or the Enacted Map as a whole are unusually non-compact compared to what has previously been employed in Missouri.

I was also asked to calculate the average Reock, Polsby-Popper, and Convex Hull scores for Missouri Congressional Districts going back to 1972. Because these maps are not provided by Dave's Redistricting, but rather are accessed from Jeffrey B. Lewis, Brandon DeVine, Lincoln Pitcher, and Kenneth C. Martis. (2013) *Digital Boundary Definitions of United States Congressional Districts, 1789-2012*, I calculated these values using R. Again, scores may vary slightly based upon projections and the level of granularity in the shapefile.

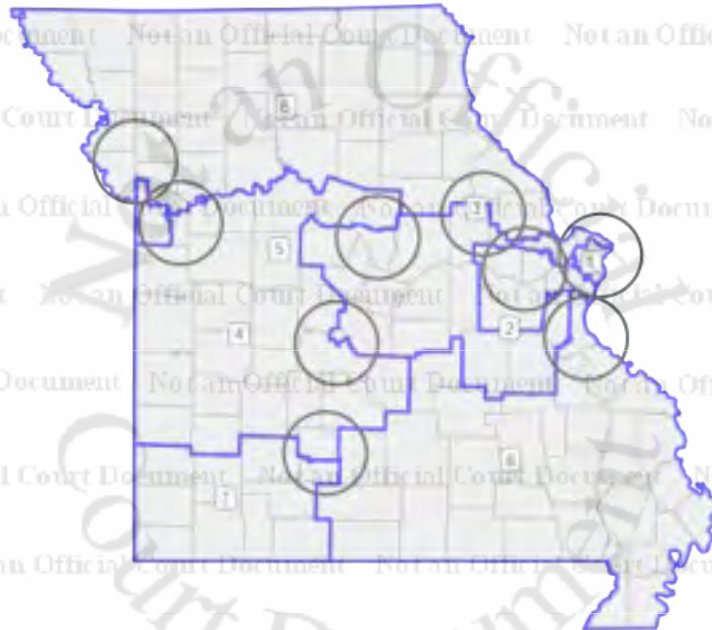
Table 2: Various Average Compactness Scores, Various Missouri Maps

| Map     | Reock | Polsby-Popper | Convex Hull |
|---------|-------|---------------|-------------|
| 1972    | 0.406 | 0.337         | 0.763       |
| 1982    | 0.457 | 0.392         | 0.786       |
| 1992    | 0.428 | 0.326         | 0.752       |
| 2002    | 0.445 | 0.276         | 0.724       |
| 2012    | 0.396 | 0.27          | 0.752       |
| 2022    | 0.417 | 0.319         | 0.786       |
| Enacted | 0.413 | 0.366         | 0.802       |

I have also been asked to compare the number of county splits, and counties split, to the 2011 and 2022 maps, as well as municipalities split. The 2012 Map splits eight counties a total of nine times. The 2022 map splits nine counties a total of ten times. The Enacted map splits five counties a total of seven times.

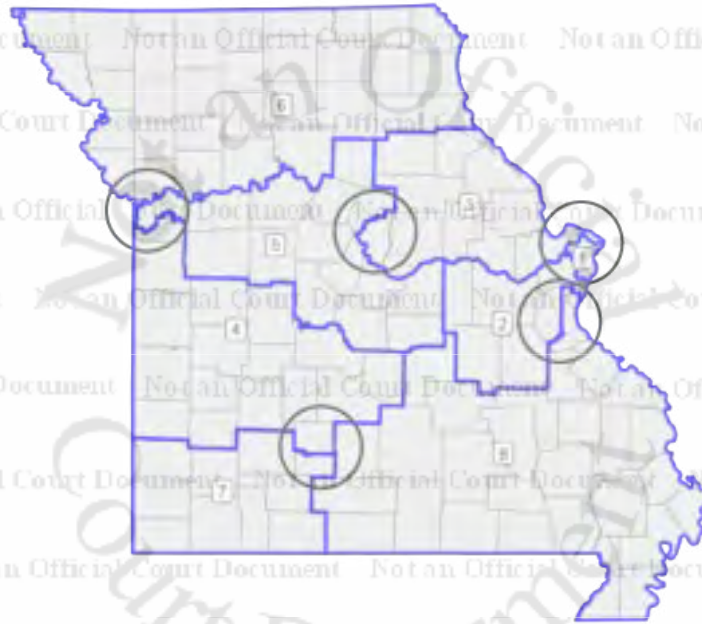
I was asked to produce a map of the 2022 map, highlighting the county splits. It follows:

Figure 7: 2022 Map, with County Splits highlighted



I was asked to do the same for the Enacted Map. It follows:

Figure 8: Enacted Map, with County Splits highlighted



The split of Jackson County is also not entirely *sui generis*. It was split three ways in the 2022 map. As Dr. Rodden's maps show on pages 8 and 9, it was also split three ways in 1992 and 2002. As to the specific split, it mostly follows senate district lines. The following map takes the Missouri State Senate map and lays it over the congressional map. Where one sees blue lines, it

means that the Enacted Map splits Jackson County in a way that the senate map does not. There is very little blue. This is because the Enacted Map follows the State Senate map through Jackson County almost perfectly, placing districts 9 and 11 in Congressional District 5 and District 8 in District 4. It largely places District 7 in Congressional District 4, with around 8,261 residents in District 5 and 16,037 in District 6. While that split is avoidable, it would add an additional hook to District 4 reducing some compactness measures, and would necessitate a different county split for the districts.

Figure 9: Jackson County State Senate Districts (Black) and Congressional Districts (Blue)



The following map reverses this image, layering the state senate districts on top. Thus, here, any black that shows up reflects a state senate line not mimicked in the Enacted Map.



Figure 10: Jackson County State Senate Districts (Black) and Congressional Districts (Blue)



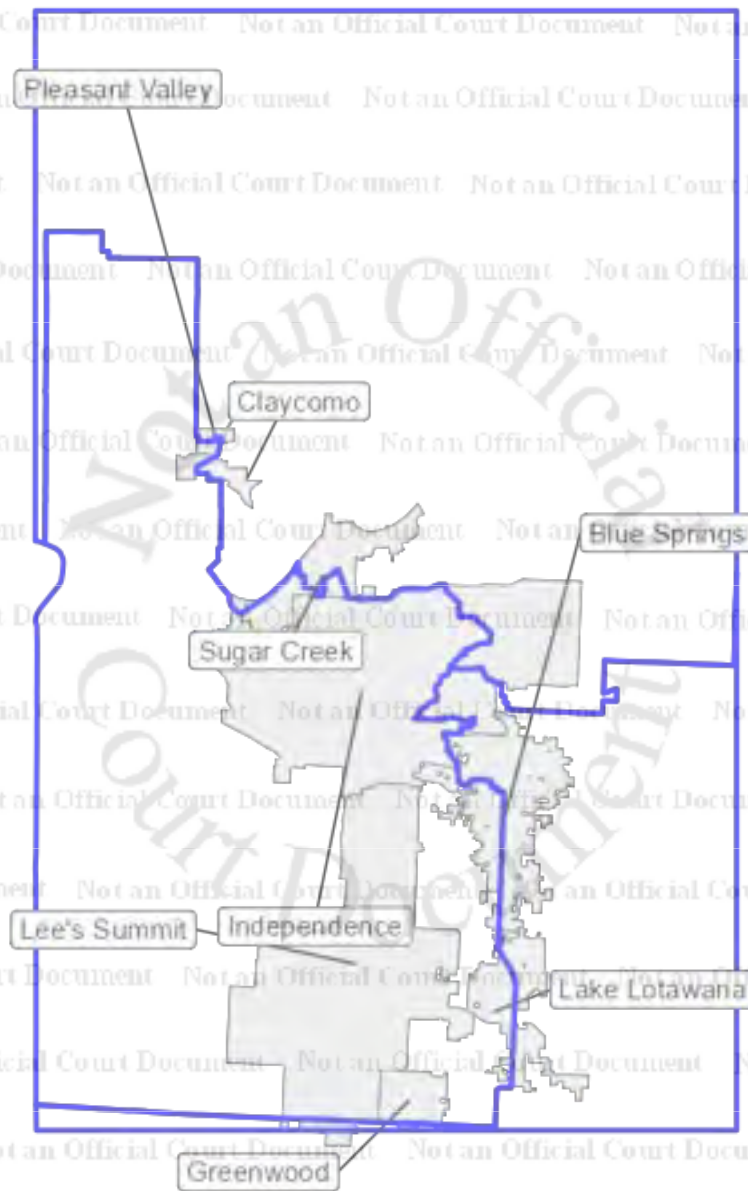
Note that Dr. Rodden places much emphasis on keeping the central business district together. Although he provides no source against which I can check this, he defines it as the area “bounded by 31st Avenue to the south, the Missouri River to the north, the Kansas border to the west, and Woodland Avenue to the east.” This is a bit vague, given that Woodland Avenue is no longer a continuous street and does not extend to the Missouri River, but regardless, it appears to have a population of around 29,000 residents. It could be placed in a single state Senate district. However, the state Senate map divides the central business district as well, in much the same way that the Enacted Map does (it is difficult to tell north of I-70, because Woodland Ave terminates shortly to the north of I-70). The state House map, for that matter, splits it between three districts, even though it could be placed within a single district.

Fig. 11: Split of “Central Business District” in State House Map.



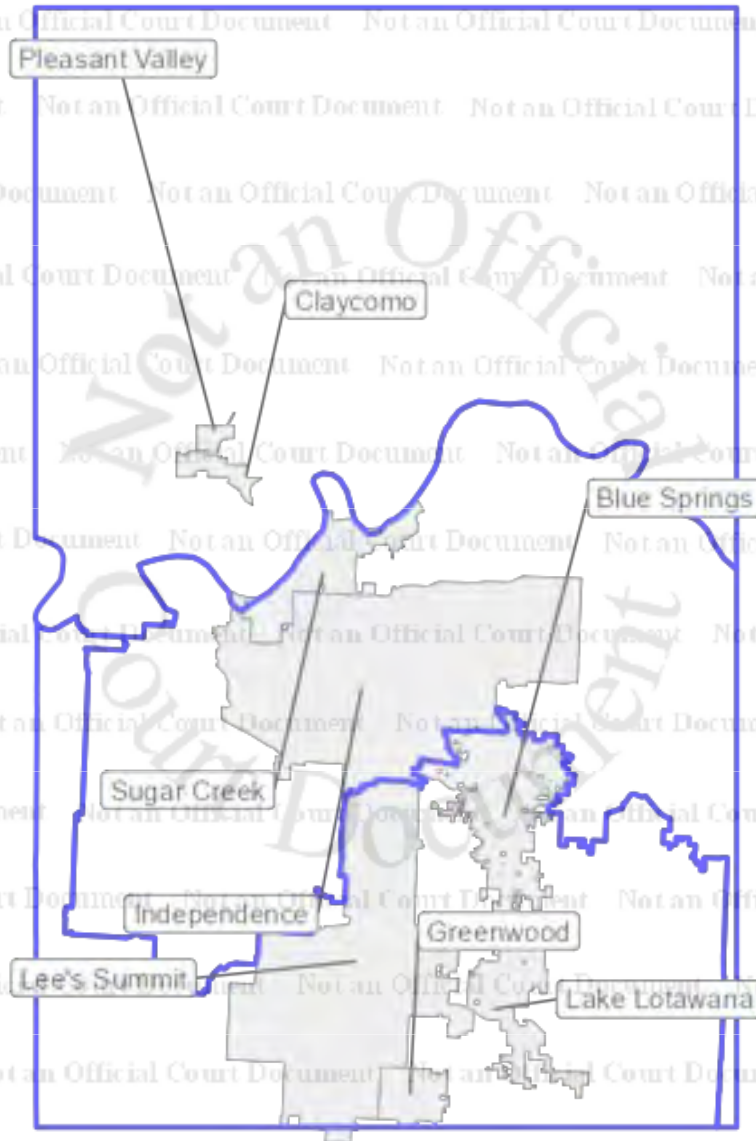
I was also asked to examine how the 2022 Map and Enacted Map split municipalities in Jackson and Clay counties. Both maps split Kansas City between three districts, although the splits in the 2022 Map occur outside of Jackson County. As to the additional municipalities, the 2022 map splits numerous municipalities, including some major Kansas City suburbs: Blue Springs, Claycomo, Greenwood, Independence, Lake Lotwana, Lee's Summit, Pleasant Valley, and Sugar Creek.

Fig. 12: Municipalities in Jackson and Clay counties split in 2022 Map



The Enacted Map fixes most of these splits (indeed as Dr. Cervas' report indicates, the Enacted Map fixes quite a few split municipalities).

Fig. 13: Municipalities in Jackson and Clay counties split in 2022 Map, as treated by Enacted Map



There are cross-county splits for Sugar Creek and Independence, but these are unpopulated.

As a final note, the split places the downtown airport, (Charles B. Wheeler MKC), in the Sixth District. The current Representative from the Sixth is Sam Graves, who chairs the Transportation Committee.

## **VI. Responses to specific experts.**

I have also been asked to review the expert reports of Drs. Jonathan Rodden, Ari J. Stern, Jonathan Cervas and John Cromartie. Despite their considerable lengths, most of these reports make a few discrete points, and for the most part “are what they are.” Their significance is more legal than the sort of things that experts typically comment upon. Nevertheless, there are some important facets worth pointing out.

Dr. Cervas’ report mostly serves to demonstrate that districts 4 and 5 could have been redrawn in such a way as to improve compactness scores. He does so while achieving certain goals: keeping core retention, compactness scores, and political subdivision splits within rough range of the Enacted Map. If the “as may be” portion of the Missouri Constitution requires the *most* compact map to be selected, then the results may be useful for such analysis. If that is the case, however, he would seem to have produced only one map: either Cervas 1—which is the most compact of the three maps—or Cervas 3, which is the most compact of the three maps with only five split counties. Whether that is what the law requires, however, is a legal conclusion that I do not opine about.

Dr. Stern is similar to Dr. Cervas, in that he produces a large number of computer generated maps whose features are purportedly similar to those of the Enacted Map (it is obviously impossible to examine all 100,000 maps). Again, if the point is to demonstrate that it is possible to generate a map that is even *more* compact than the Enacted Map, these maps may be relevant. There are a few points that may be of interest, however. First, 100,000 maps does not necessarily



mean 100,000 conceptually different maps. The differences between Map 12,064 on page 53 and Map 26,709 on page 54, for example, appear relatively minor, with different slight inlets into southern Jackson County; the same is true for Map 58,210.

Second, to the extent that Dr. Stern is engaged in an outlier analysis here—that is, attempting to draw some type of conclusion that the map is particularly non-compact compared to what the ensemble drew—it would be a weaker conclusion than typical. First, because the Enacted Map is similar in compactness to Congressional Maps drawn in Missouri over the past 56 years, this analysis would suggest that those maps were problematic as well. Second, when you perform an outlier analysis for partisanship or race, you instruct the computer to mimic what the map drawer was doing to the best of your abilities, while excluding partisan or racial data. The idea is to sample from the universe of maps that the map drawer could have sampled from if he or she were ignoring political and/or racial data. If the map ensemble fairly reflects the map drawers non-political/non-racial goals but appears to be an outlier with respect to political or racial data from the resulting ensemble maps, then we might conclude that the map maker did not, in fact, ignore political or racial data.

Compactness, however, is different. First, and perhaps most obviously, very few people draw with specific compactness numbers in mind. While experienced mappers may be able to look at a district and estimate roughly what the Polsby-Popper or Reock score would be, it would be truly extraordinary if one could do so consistently with any degree of precision. This is usually accounted for by fine-tuning a specified compactness parameter in the Ensemble Code to match roughly the scores of the Enacted Map.

Herein lies the rub. While Dr. Stern claims that he did not impose any compactness parameters, the truth is that the GerryChain methodology by its nature will do so. This is because

spanning trees – the method used by ReCom in GerryChain to identify potential splits – by its nature creates compact maps. Spanning-tree-based recombination does not *enforce* compactness, but it tends to avoid extreme or pathological district shapes. As Dr. Moon Duchin, one of the leads on the GerryChain project explained: “So it’s worth saying the basic method creates plans that take into account population balance that ensure contiguity and that prioritize compactness, upweight compactness. But they do that without having to set -- dial a knob [sic] to the preferred level of compactness. It’s kind of baked into the mathematical calculation.”). PI Tr., Direct Exam of Moon Duchin, Ph.D., 10/06/2025 AM, at 58:3-21 ([58:16-21]). *See also* D. DeFord, M. Duchin & J. Solomon, *Recombination: A Family of Markov Chains for Redistricting*, 3 Harv. Data Sci. Rev. (2021), available at <https://hdr.mitpress.mit.edu/pub/1ds8ptxu/release/5> (“In shifting to spanning tree-based sampling methods to overcome the limitations of *Flip*-based chains, we were led to a new point of view on compactness that has significant independent value. Recombination implements compactness in a soft stochastic fashion, rather than selecting and manually weighting or thresholding a score. We make the case that this spanning tree count favored by recombination amounts to a new kind of compactness, better suited to the needs of redistricting: it draws on latent cluster structure in geographical networks rather than treating redistricting as a Euclidean geometry problem where ideal districts are circles and squares.”) (“In Section 5.1, we explain why this favors plans that look plump and compact to the eye.”)(discussing ReCom’s “natural relationship to compactness”).

In other words, ReCom won’t naturally select from the universe of plans that are available to the map drawer. Instead, left to its own devices it will naturally draw districts with a high degree of compactness. This isn’t like political or racial data where leaving out a parameter means the computer will ignore it; it means that left to its own devices ReCom by its nature reverts to a *de*

*facto* level of compactness by its very nature. Here, if you choose not to decide you still have made a choice.

Additionally, this *de facto* level of compactness isn't necessarily an ideal one. To my knowledge, left to its own devices ReCom does not claim to optimize compactness (nor, for that matter, does it claim to optimize any other considerations such as county or municipal splits without further instructions). Moreover, one *may* adjust the compactness parameter in ReCom upward or downward, so as to favor more- or less- compact districts. Had Dr. Stern done this, he likely would have produced more maps that look like the Enacted Map. Overall, the best one can conclude here is that the Enacted Map does not – at least by some measures – resemble the compactness of maps that ReCom produces. The legal significance of this is unclear. At most this suggests that the map drawer had a somewhat different view of what constitutes “compact” than the ReCom algorithm natural produces.

Finally, note that Dr. Cromartie appears to draw some type of conclusion by the fact that the Enacted Map includes districts combining very different types of counties and extending into different metropolitan areas.<sup>1</sup> But Dr. Stern demonstrates that even a computer drawing blindly to such considerations can make similar choices. Map 88,159 on page 57 includes a District 5 that includes Jackson County, Lafayette County, Saline County, Howard County, Randolph County and portions of Boone County. Dr. Cromartie identifies these as Metro Core, Metro Outlying, Nonmetro, Metro Outlying, and Nonmetro, respectively, on page 10 of his report. It is unclear how Boone County would be classified, but one assumes it is Metro Core.

Much of Dr. Rodden's report is dealt with at other points in this report; much of the rest consists of a smorgasbord of census data and regional information that Missouri map drawers may

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<sup>1</sup> It may be useful to observe that District 6 is pulled out of the St. Louis metro area by removing Lincoln County; the district no longer joins portions of the two major metropolitan areas in Missouri.

or may not have relied upon when drawing maps, either this cycle or in the past, that happened to be united in 2022 but were not in the Enacted Map (and may or may not have been in earlier maps he displays). He notes, however, at the end of his report that “[i]t does not appear that the 2025 Map’s deviation from the principle of closely united territory arose from an effort to preserve boundaries of Missouri Senate districts.” Rodden Report, at 37. It is unclear exactly why he comes to this conclusion. His own map illustrates that the split of Jackson County barely deviates from state senate boundaries. It splits one state senate district, leaving around 85% of that district’s population intact. Given that there are no other county splits in districts 5 or 6, it would be an exceeding stroke of luck to not have to deviate from *some* state senate boundary in the map, since state Senate districts are not required to be equipopulous, or to have to do so within the one county that is split. While the 2022 Map might split fewer districts *outside* of Jackson County, rural Missouri has large state senate districts that sprawl multiple counties; keeping counties whole will often be at odds with avoiding senate district splits.

As to the other boundary splits that Dr. Rodden examines, given that the map closely follows state senate boundaries in Jackson County, it is unsurprising that it is less attentive to state Assembly district or school district boundaries within Jackson County. It would only follow these boundary lines to the extent that state Senate districts follow these boundary lines. The one exception here – which Dr. Rodden does not examine – is municipal splits where, partially by virtue of following state Senate boundaries, the Enacted Map improves upon the 2022 Map.

This also addresses one of Dr. Rodden’s more incendiary claims: That there is a potential racial gerrymandering claim at work here. To my knowledge, such a claim has not been brought. Dr. Rodden emphasizes Troost Ave. as a racial dividing line. But the Enacted Map also follows closely the State Senate boundary here, which also divides along Troost Ave.

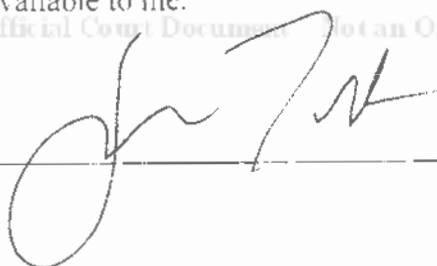
Dr. Rodden suggests that there is something unusual about crossing the Missouri River. He writes "As demonstrated in the historical maps in Part III, the Missouri River has long been part of the dividing line between Districts 5 and 6 in the Kansas City area. In the 2025 Plan, District 6 dips down across the Missouri River and extracts part of Kansas City south of the river for the first time in history." Rodden Report at 35.

But it is only unusual – at best – (a) to cross the Missouri River (b) into Kansas City and to do so (c) in a District that is numbered six. That is a highly specific complaint. As his own maps demonstrate, the Sixth District has crossed the Missouri River into Jackson County in every map since 1982. And this misses another seemingly crucial observation: The *Fifth District* crosses the Missouri River into Kansas City in both the 2012 and 2022 maps. If anything, this map is the first map since 2002 that doesn't cross the Missouri River twice in Jackson County.

Dr. Rodden also criticizes the splitting off of Morgan County from other recreation-dependent counties in the Lake of the Ozarks region. But the 2012 map did so as well, splitting off a portion of Camden County, in the same region. In fact, that map used the middle of Lake of the Ozarks as part of its boundary when splitting Camden County; the Enacted Map at least follows a county boundary when doing so.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. I reserve the right to revise, update, or supplement my opinions as new information becomes available to me.

 1/13/2024



**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

**TERRENCE WISE, *et al.*,**

**Plaintiffs,**

**v.**

**Case No. 2516-CV29597  
Division 15**

**STATE BOARD OF MISSOURI, *et al.*,**

**Defendants.**

**ELIZABETH HEALEY, *et al.*,**

**Plaintiffs,**

**v.**

**Case No. 2516-CV31273  
Division 15**

**STATE BOARD OF MISSOURI, *et al.*,**

**Defendants.**

**EXPERT REPORT OF M.V. HOOD III**

## I. INTRODUCTION AND BACKGROUND

My name is M.V. (Trey) Hood III, and I am a tenured professor at the University of Georgia with an appointment in the Department of Political Science. I have been a faculty member at the University of Georgia since 1999. I also serve as the Director of the School of Public and International Affairs Survey Research Center. I am an expert in American politics, specifically in the areas of electoral politics, racial politics, election administration, and Southern politics. I teach courses on American politics, Southern politics, and research methods and have taught graduate seminars on the topics of election administration and Southern politics.

I have received research grants to study election administration issues from the National Science Foundation, the Pew Charitable Trust, the Center for Election Innovation and Research, and the MIT Election Data and Science Lab. I have also published peer-reviewed journal articles specifically in the area of election administration, including redistricting. My academic publications are detailed in a copy of my vita that is attached to the end of this report. Currently, I serve on the editorial boards for *Social Science Quarterly* and *Election Law Journal*. The latter is a peer-reviewed academic journal focused on the area of election administration.

I have been tendered as an expert in a number of cases involving questions of district compactness in both federal and state courts. Some of the cases in which I have offered expert testimony on this specific topic include: *Cross v. Illinois State Board of Elections*, 113840 (Illinois Supreme Court); *Bethune-Hill v. Virginia State Board of Elections* (3:14-cv-00852-REP-GBL-BMK); *Vesilind v. Virginia State Board of Elections*, CL15003886-00 (Richmond Circuit Court); *Common Cause v. Rucho*, 1:16-CV-1026 (M.D. N.C.), *Ohio A. Philip Randolph Institute v. Ryan Smith*, 1:18-cv-357 (S.D. Ohio); *Common Cause v. Lewis*, 18-CVS-014001 (Wake County Superior Court); and *Turtle Mountain Band of Chippewa Indians v. Jaeger*, 3:22-cv-00022 (E.D. ND).

I am receiving \$450 an hour for my work in this case and \$450 an hour for any testimony associated with this work. In reaching my conclusions, I have drawn on my training, experience, and knowledge as a social scientist who has specifically conducted research in the area of redistricting. My compensation in this case is not dependent upon the outcome of the litigation or the substance of my opinions.

## **II. SCOPE AND OVERVIEW**

I have been asked by counsel for the Missouri Republican State Committee to provide an assessment of Missouri's congressional districting plan passed in 2025 (HB 1). My report is organized as follows. In Section III I provide a brief background on the districting plan under challenge. Section IV analyzes the 2025 congressional plan on a number of traditional redistricting principles: compactness and contiguity, population, maintaining communities of interest, and core retention. The final section of my report (V) provides a synopsis of my overall conclusions in this case.

Note: Throughout this report I refer to different congressional plans. The plan challenged in this matter is referred to as the 2025 plan (labeled by others as HB 1 or the *Missouri First Map*). Previous congressional districting plans include those implemented following the 2010 Census (the 2012 plan) and the 2020 Census (the 2022 plan).

## **III. CASE BACKGROUND**

In August of 2025 the Missouri General Assembly convened in a special session and passed legislation (HB 1) which reconfigured the state's eight congressional districts. On September 28, 2025 Governor Kehoe signed HB 1 into law.<sup>1</sup> The plaintiffs in this action allege that three of Missouri's congressional districts violate the compactness standard as set forth in the State Constitution. Article III, § 45 of the Missouri Constitution states the following in reference to drawing congressional district boundaries within the state:

When the number of representatives to which the state is entitled in the House of the Congress of the United States under the census of 1950 and each census thereafter is certified to the governor, the general assembly shall by law divide the state into districts corresponding with the number of representatives to which it is entitled, which districts shall be composed of contiguous territory as compact and as nearly equal in population as may be.

More specifically, plaintiffs allege that CD 4, CD 5, and CD 6 in the 2025 congressional districting plan are not sufficiently compact under the provision of the Missouri Constitution cited above.

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<sup>1</sup>Source: <https://governor.mo.gov/press-releases/archive/governor-kehoe-signs-missouri-first-map-law>.

## IV. PLAN COMPARISONS<sup>2</sup>

In this section I compare the 2025 congressional plan to the 2012 and 2022 plans on various redistricting criteria.

### **A. District Compactness and Contiguity**

Before discussing district compactness, I will note that the eight congressional districts from the 2025 plan are contiguous.

Specifically, the compactness of Districts 4, 5, and 6 in Missouri's 2025 congressional plan is the primary issue being challenged by the plaintiffs in this matter. The various measures of compactness provide a non-normative, numerical means to compare districts on this criterion. There is, however, no consensus on which of the numerous compactness measures should be considered superior.<sup>3</sup> Nor is there any consensus on what might constitute an objective cut-point whereby a district might be considered to be non-compact. It is certainly possible, however, to compare districts (or whole plans) in order to make a determination that a comparison set is more or less compact. In devising such comparisons some thought needs to be given to what should be compared to what. In this section I will be comparing the challenged districts from the 2025 plan to the remaining five districts not under challenge. In addition, I will also draw comparisons with districts from the 2012 and 2022 congressional plans.

In this report I make use of three commonly used measures of compactness, namely Reock, Polsby-Popper, and Schwartzberg.<sup>4</sup> These compactness measures have been used extensively in court cases involving redistricting. The Reock measure is also denoted as the smallest circle score in that it compares the area of the district to the area of a circle. More formally the Reock measure is the *ratio of the district area to the area of the minimum circumscribing circle*.<sup>5</sup> The Polsby-Popper measure, a perimeter-to-area comparison, calculates the *ratio of the district area to the area of a circle with the same perimeter*.<sup>6</sup> The Schwartzberg measure is a ratio that compares the perimeter of a district to the *perimeter of a circle of equal area*.<sup>7</sup> The Reock and Polsby-Popper measures range between 0 and 1, with one an indication of perfect compactness. For both measures a district analogous to a circle would score a value of 1. A circle would also score a value of one on the Schwartzberg index and less compact shapes are represented by values greater than one. Unlike Reock or Polsby-Popper, lower values on the Schwartzberg measure denote increasing compactness.

<sup>2</sup>Compactness scores, unless denoted otherwise, were generated using Maptitude software.

<sup>3</sup>Of course, as previously indicated, compactness measures are based on calculations that employ different metrics. For this reason, most analysts examine compactness using more than one measure.

<sup>4</sup>More specifically I am using the *Alternative Schwartzberg* as reported by Maptitude.

<sup>5</sup>Richard G. Niemi, Bernard Grofman, Carl Calucci, and Thomas Hofeller. 1990. "Measuring Compactness and the Role of a Compactness Standard in a Test for Partisan and Racial Gerrymandering." *Journal of Politics* 52: 1155-1181.

<sup>6</sup>David Polsby and Robert D. Popper. 1991. "The Third Criterion: Compactness as a Procedural Safeguard against Partisan Gerrymandering." *Yale Law and Policy Review* 9:301-335.

<sup>7</sup>Joseph E. Schwartzberg. 1966. "Reapportionment, Gerrymanders, and the Notion of Compactness." *Minnesota Law Review* 50:443-452.

Table 1 examines the Reock compactness score for the 2012, 2022, and 2025 Missouri congressional plans. The districts under challenge in this matter are shaded gray. Again, for the Reock measure higher values are an indication of increasing compactness. Comparing the plans as a whole, the average Reock score across the 2012, 2022, and 2025 congressional plans ranges from .44 to .47, respectively. The 2025 plan as a whole sees a slight improvement in average compactness levels over the 2022 plan, moving from .45 to .47. Reock scores for the districts in the 2022 plan ranged from .30 to .53, while the 2025 plan ranged from a low of .35 to a high of .59. Of note is fact that District 6 under the 2022 plan is less compact than any of the districts in the 2025 plan. One of the districts under challenge in 2025 (District 6) becomes more compact from 2022 to 2025, moving from .30 to .36. Five of the eight districts in the 2025 plan have the same or higher Reock scores in 2025 as compared to the previous plan. The Reock scores for Districts 4 and 5 do decrease across these two plans. The score for District 4 decreases .10 (from .53 to .43), while the Reock score for District 5 drops .02 (from .37 to .35). It should be noted that increasing the compactness of some districts within a geographically bounded area, in this case the State of Missouri, may cause a diminishment in the compactness scores of surrounding districts.<sup>8</sup>

Table 1. Reock Compactness Comparisons

| CD                 | 2012 | 2022 | 2025 |
|--------------------|------|------|------|
| 1                  | 0.48 | 0.53 | 0.51 |
| 2                  | 0.50 | 0.48 | 0.59 |
| 3                  | 0.36 | 0.37 | 0.44 |
| 4                  | 0.43 | 0.53 | 0.43 |
| 5                  | 0.33 | 0.37 | 0.35 |
| 6                  | 0.29 | 0.30 | 0.36 |
| 7                  | 0.53 | 0.53 | 0.53 |
| 8                  | 0.58 | 0.52 | 0.52 |
| Mean               | .44  | .45  | .47  |
| Standard Deviation | .10  | .09  | .09  |

As noted, the Reock scores presented in Table 1 were generated using the Maptitude software program.<sup>9</sup> The Reock measure can be especially sensitive to the underlying projection employed.<sup>10</sup> In Table 2, my analysis is replicated using Reock scores generated using Dave's Redistricting Application. In the case of Maptitude and Dave's Redistricting Application, Reock scores may vary because these two programs rely on different projections. As some of the plaintiff experts like Professor Cervas use Reock scores generated from Dave's Redistricting Application, I will repeat my analysis using these scores which are located in Table 2. Reock scores for the 2025 plan range from a low of .28 to a high of .57. The range for the challenged

<sup>8</sup>In a Missouri Supreme Court decision, it is noted that "the district boundaries for every district are interrelated and that some districts must be drawn less compactly because of the shape of neighboring districts." *Pearson v. Koster*, 367 S.W.3d 36, 15 (2012).

<sup>9</sup>The reported Maptitude scores comport with those in Professor Stern's expert report which also relies on Maptitude.

<sup>10</sup>See for example: Moon Duchin and Bridget Eileen Tenner. 2024. "Discrete Geometry for Electoral Geography." *Political Geography* (<https://doi.org/10.1016/j.polgeo.2023.103040>).



districts is .28 to .39. Compactness for challenged District 6 actually increases by .03, from .25 to .28. Compactness scores for six of eight districts increased or stayed constant from 2022 to 2025. The remaining two districts did see a drop in their Reock score. The Reock score for District 4 decreased from .51 to .39 and the score for District 5 decreased from .42 to .29.

Table 2. Reock Compactness Comparisons (Alternative Scores)

| CD                 | 2012 | 2022 | 2025 |
|--------------------|------|------|------|
| 1                  | 0.54 | 0.57 | 0.57 |
| 2                  | 0.46 | 0.41 | 0.54 |
| 3                  | 0.30 | 0.30 | 0.36 |
| 4                  | 0.41 | 0.51 | 0.39 |
| 5                  | 0.26 | 0.42 | 0.29 |
| 6                  | 0.24 | 0.25 | 0.28 |
| 7                  | 0.51 | 0.45 | 0.45 |
| 8                  | 0.46 | 0.42 | 0.42 |
| Mean               | .40  | .42  | .41  |
| Standard Deviation | .11  | .10  | .10  |

Table 3 examines how districts stack up on a second measure of compactness—the Polsby-Popper score. Here, one may note the 2025 plan as a whole is more compact than the 2012 or 2022 plans as indicated by the mean values at the bottom of the table. Polsby-Popper scores for the 2025 plan range from a low of .20 to a high of .53. Polsby-Popper scores for the challenged districts range from .20 (District 5) to .36 (District 6). District 8 (not under challenge) has a lower Polsby-Popper value than both Districts 4 and 6 (under challenge). Districts 4 and 6 also became increasingly compact from 2022 to 2025. The Polsby-Popper score for District 4 increased by .03 (.30 versus .33) and for District 6 by .06 (.30 versus .36). In fact, seven of eight districts in the 2025 plan had equivalent or higher Polsby-Popper scores as compared to the 2022 plan. The one exception, District 5, saw its score drop from .38 to .20.

Table 3. Polsby-Popper Compactness Comparisons

| CD                 | 2012 | 2022 | 2025 |
|--------------------|------|------|------|
| 1                  | 0.27 | 0.31 | 0.46 |
| 2                  | 0.20 | 0.29 | 0.40 |
| 3                  | 0.22 | 0.16 | 0.37 |
| 4                  | 0.23 | 0.30 | 0.33 |
| 5                  | 0.19 | 0.38 | 0.20 |
| 6                  | 0.24 | 0.30 | 0.36 |
| 7                  | 0.45 | 0.53 | 0.53 |
| 8                  | 0.35 | 0.27 | 0.27 |
| Mean               | .27  | .32  | .37  |
| Standard Deviation | .09  | .11  | .10  |

Table 4 below details Schwartzberg compactness scores (higher values denote decreasing compactness) for various Missouri congressional plans. For the 2025 plan scores range from a low of 1.38 to a high of 2.22. As denoted by the falling mean values from 2012 to 2025, the congressional plans become more compact over time based on the Schwartzberg measure. Seven of eight districts under the 2025 plan had an equivalent or lower Schwartzberg score compared to the 2022 plan, indicating comparable or increased levels of compactness. District 8 (not under challenge) in the 2025 plan has a Schwartzberg value of 1.93—higher than that of challenged districts 4 and 6. Also of note is the fact that CD 4 and CD 6 under the 2025 plan became more compact from 2022 to 2025. Among the challenged districts only CD 5 becomes less compact. Two districts from the 2012 plan, CDs 2 and 5, have higher compactness scores than the challenged district (CD 5) from the 2025 plan with the highest Schwartzberg score.

Table 4. Schwartzberg-Alternative Compactness Comparisons

| CD                 | 2012 | 2022 | 2025 |
|--------------------|------|------|------|
| 1                  | 1.92 | 1.80 | 1.48 |
| 2                  | 2.24 | 1.85 | 1.59 |
| 3                  | 2.11 | 2.52 | 1.65 |
| 4                  | 2.08 | 1.82 | 1.74 |
| 5                  | 2.27 | 1.62 | 2.22 |
| 6                  | 2.06 | 1.82 | 1.68 |
| 7                  | 1.49 | 1.38 | 1.38 |
| 8                  | 1.69 | 1.94 | 1.93 |
| Mean               | 1.98 | 1.84 | 1.71 |
| Standard Deviation | .27  | .32  | .26  |

Given that this is a case involving a state constitutional challenge, an analysis of compactness should include consideration of what, if anything, Missouri state courts have ruled may constitute an unconstitutionally compact district. Regarding this matter there is a fairly recent decision that touched upon the issue of compactness for congressional districts under the previously cited state constitutional provision. In this case, the Missouri Supreme Court upheld a Circuit Court ruling regarding the constitutionality of districts under the 2012 congressional plan. Plaintiffs in this matter had specifically challenged Districts 3, 5, and 6. These districts, and the plan as a whole, were ruled to be sufficiently compact under the Missouri Constitution.<sup>11</sup> While the Court does not establish a bright-line test using compactness measures, it can still be instructive to examine compactness scores for districts that have specifically passed constitutional muster. I will use the scores for the least compact districts from the 2012 plan to serve as a comparison point for the 2025 plan.<sup>12</sup>

Looking back at Table 1, the lowest Reock value for the 2012 plan, at .29, was associated with District 6. I have bracketed this value in the table, along with the lowest Reock values for the 2022 and 2025 plans. District 6 in the 2022 plan had a Reock score of .30, higher by .01 than the

<sup>11</sup>*Pearson v. Koster*, 367 S.W.3d 36. (Mo. Banc 2012).

<sup>12</sup>In carrying out this exercise I am not arguing that a district below this threshold level is unconstitutionally compact or, conversely, that a district above the threshold is necessarily constitutional as related to compactness.

baseline district in the 2012 plan. In the 2025 plan all three of the challenged districts have Reock scores that exceed .29. District 5 with the lowest Reock value of .35 exceeds the 2012 baseline by .06. Using the alternative Reock scores reported in Table 2, the lowest value from the 2012 plan is the bracketed value .24 associated with District 6. None of the scores from the 2025 plan fall below this baseline value. District 6 in the 2025 plan comes closest but still exceeds this value by .04.

Using Table 3, the same exercise can be repeated using the Polsby-Popper measure of compactness. In this case, District 5 has the lowest Polsby-Popper score from the 2012 plan at .19. District 3 from the 2022 plan, which was not subject to a legal challenge, has a Polsby-Popper value, at .16, below the 2012 baseline value. None of the districts in the 2025 plan have Polsby-Popper measures that fall below .19. District 5 with a score of .20 comes closest, exceeding the 2012 threshold by .01.

As a reminder, higher values on the alternative Schwartzberg measure denote decreasing compactness. So, in this case we will use the largest Schwartzberg value from the 2012 plan to act as ceiling as opposed to a floor. In 2012, District 5 had a Schwartzberg score of 2.27. None of the districts from the 2025 plan have a Schwartzberg value that exceeds 2.27. District 5, at 2.22, comes the closest but still falls below the 2012 threshold value by .05. It is interesting to note that District 3 in the 2022 plan exceeds the 2012 value by .25.

There is also at least one academic article of note that suggests a cutoff point by which a district may be judged to be non-compact. In their article Pildes and Niemi analyze U.S. House districts nationwide in the aftermath of the *Shaw v. Reno* decision.<sup>13</sup> In this case the U.S. Supreme Court judged a congressional district in North Carolina (NC 12) a racial gerrymander, in part, based on its *bizarre* appearance.<sup>14</sup> On two measures of compactness, Reock and Polsby-Popper, these scholars suggest numerical values whereby a district might be judged to be non-compact. For the Reock measure this value is less than .16 and for the Polsby-Popper measure this value is less than .06.<sup>15</sup> These researchers also propose summing the Reock and Polsby-Popper scores to create a composite compactness score. For this composite score the cutoff is .22. If these metrics are applied to the three challenged congressional districts specifically, none breaches any of these limits (see again Tables 1 and 3). Using these specific metrics there is no evidence to categorize the challenged congressional districts as being non-compact.

As an addendum to my analysis on compactness, I have created three figures which compare the compactness levels of the challenged districts to the remaining districts from the 2025 plan, as well as districts from the 2022 and 2012 plans. In these figures the challenged districts from the 2025 plan are represented by red squares. The remaining districts are represented as blue circles [a blue triangle indicates there are multiple districts with the exact same compactness score stacked on top of one another]. In addition, I have drawn a black rectangle around the group of districts which are under challenge from the 2025 plan. I will refer to the area bounded within this rectangle as the zone of similarity. Figures 1-3 are located at the end of this section.

<sup>13</sup>Richard H. Pildes and Richard G. Niemi. 1993. "Expressive Harms, 'Bizarre Districts,' and Voting Rights: Evaluating Election-District Appearances After *Shaw v. Reno*." *Michigan Law Review* 92(3): 483-587.

<sup>14</sup>See *Shaw v. Reno* 113 S. Ct. 2816 (1993).

<sup>15</sup>For purposes of comparison, NC 12 had a Reock score of .05 and a Polsby-Popper score of .01.

Figure 1 plots compactness scores based on the Reock measure. The zone of similarity encompassing the challenged districts extends from .35 to .43. The remaining five districts from the 2025 plan are located above the rectangle. Two districts in the 2022 plan fall inside the rectangle and one district (CD 6) is located below the rectangle indicating it is less compact than the three 2025 districts under challenge. Two districts from the 2012 plan are analogous to the 2025 challenged districts (falling inside the rectangle), while an additional two districts are located below the rectangle. Stated otherwise, half (50%) of the districts in the 2012 plan had Reock scores equal to or below those of the 2025 challenged districts. Again, districts in the 2012 plan were judged to be sufficiently compact from a constitutional perspective by the Missouri Supreme Court.

Figure 2 repeats the process using the Polsby-Popper measure for compactness. Here the rectangular zone encompassing the challenged districts extends from .20 to .36. As denoted by the figure, District 8 from the 2025 plan which is not being challenged, is actually located within the rectangle. Half (50%) of the districts from the 2025 plan have scores that exceed the highest value amongst the challenged districts. Looking at the 2022 plan, five districts are housed within the rectangle and one district is actually located below the rectangle, an indication it is less compact than any of the three challenged districts from the 2025 plan. In the case of the 2012 plan six districts have comparable scores to that of the challenged districts and one district falls below the .20 threshold (the lowest Polsby-Popper score among the three challenged districts). In summary, 75% of the districts from the 2022 plan and 88% of the districts from the 2012 plan have Polsby-Popper scores equal to or less than those for the three 2025 challenged districts.

A comparison of Schwartzberg scores is provided in Figure 3. The figure is based on the alternative Schwartzberg measure referenced earlier where lower values are indicative of increasing compactness. Looking at the 2025 plan, District 8 (not under challenge) falls within rectangle containing the challenged districts. The remaining four districts are located below the zone of similarity, indicating that they are more compact in comparison to the challenged districts. In the 2022 plan a total of five districts (63%) fall within the zone of similarity with the challenged districts and one district is located above this area, an indication it is less compact than the challenged districts. Using the Schwartzberg measure 75% of the districts from the 2022 plan are equivalent to or less compact than the 2025 challenged districts. The 2012 plan reveals a similar pattern with five districts (63%) located within the zone of similarity and two districts (25%) above this area. Altogether, 88% of districts from the 2012 plan are synonymous with or less compact compared to the 2025 challenged districts.

Figure 1. Reock Scores

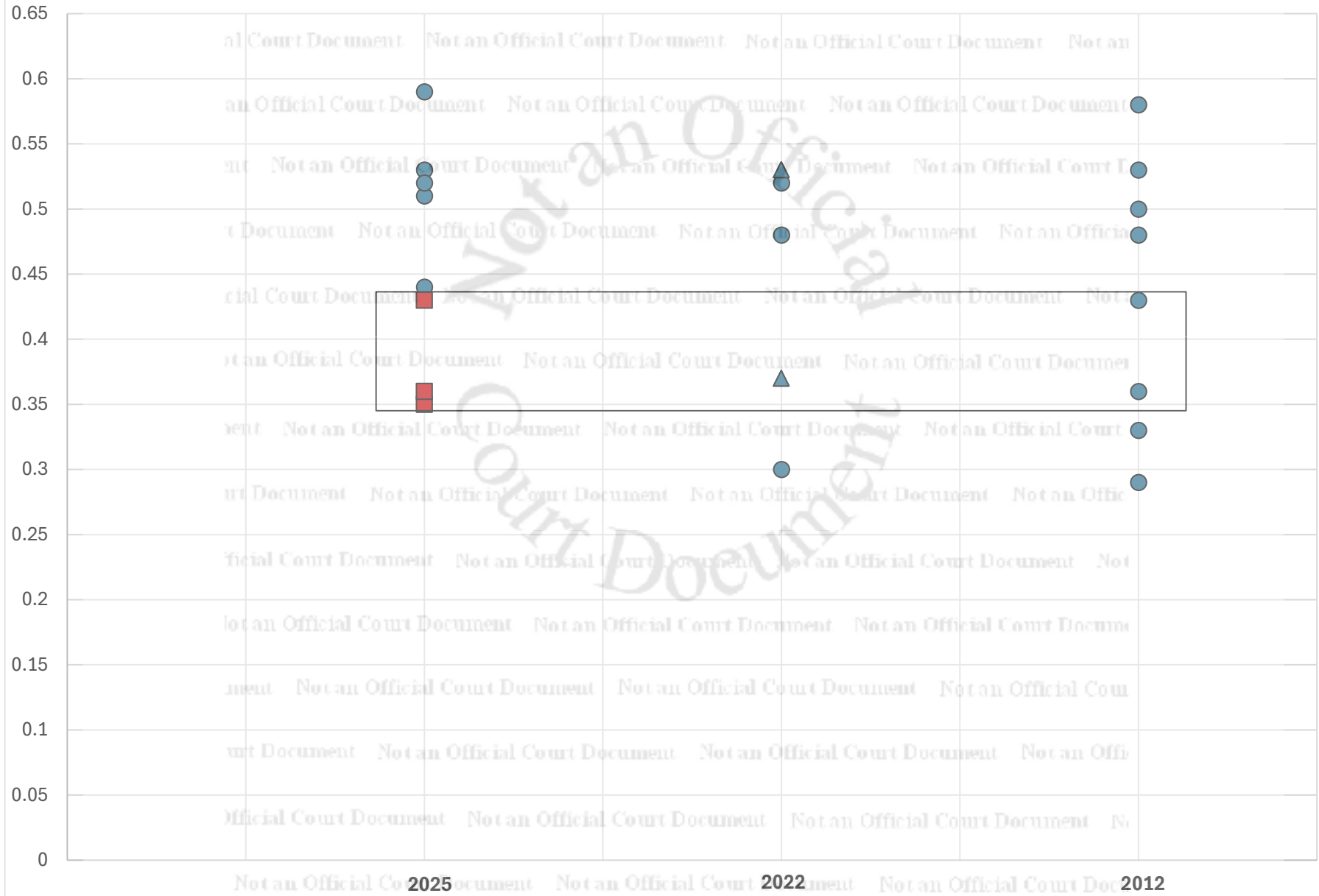




Figure 2. Polsby-Popper Scores

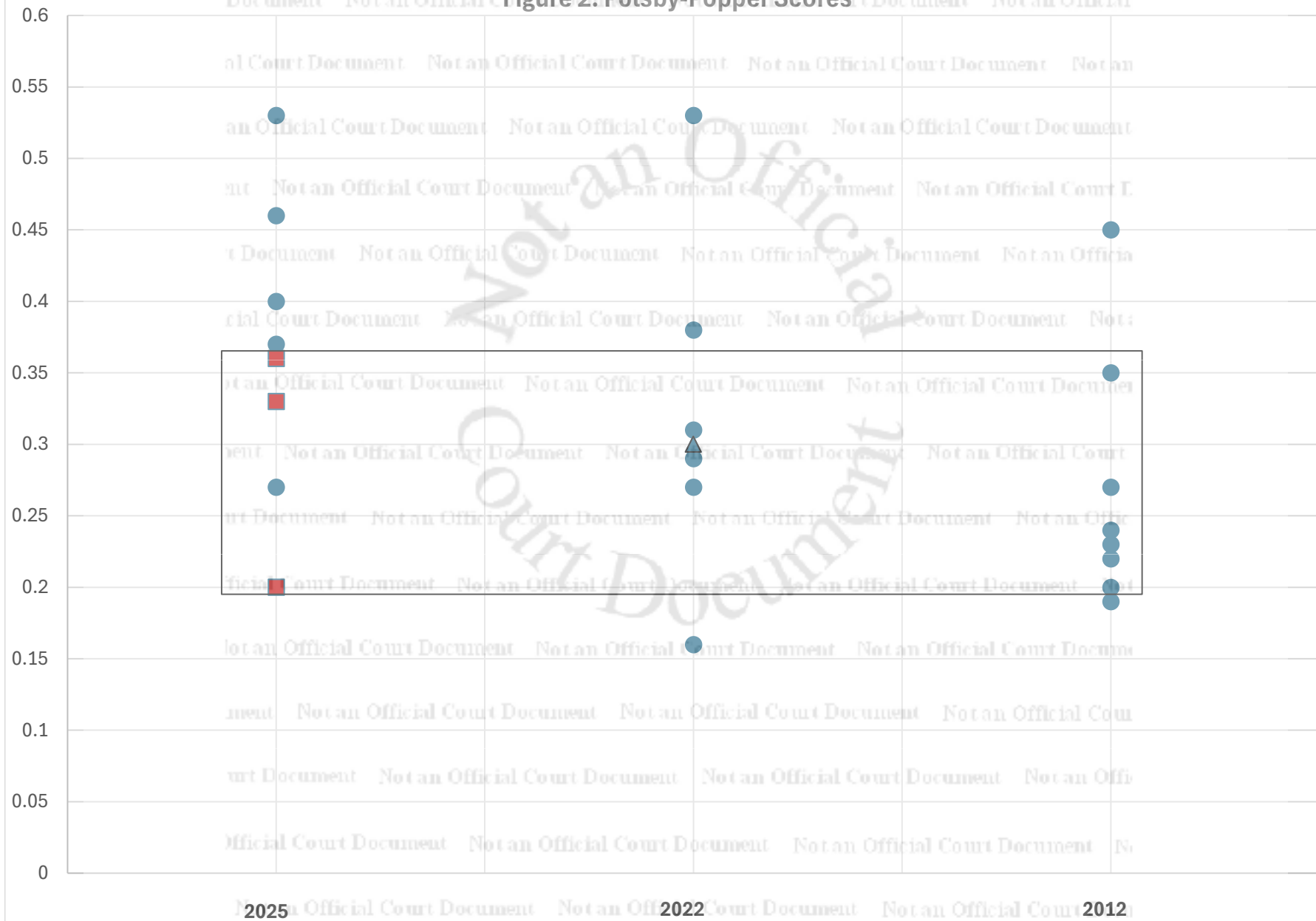
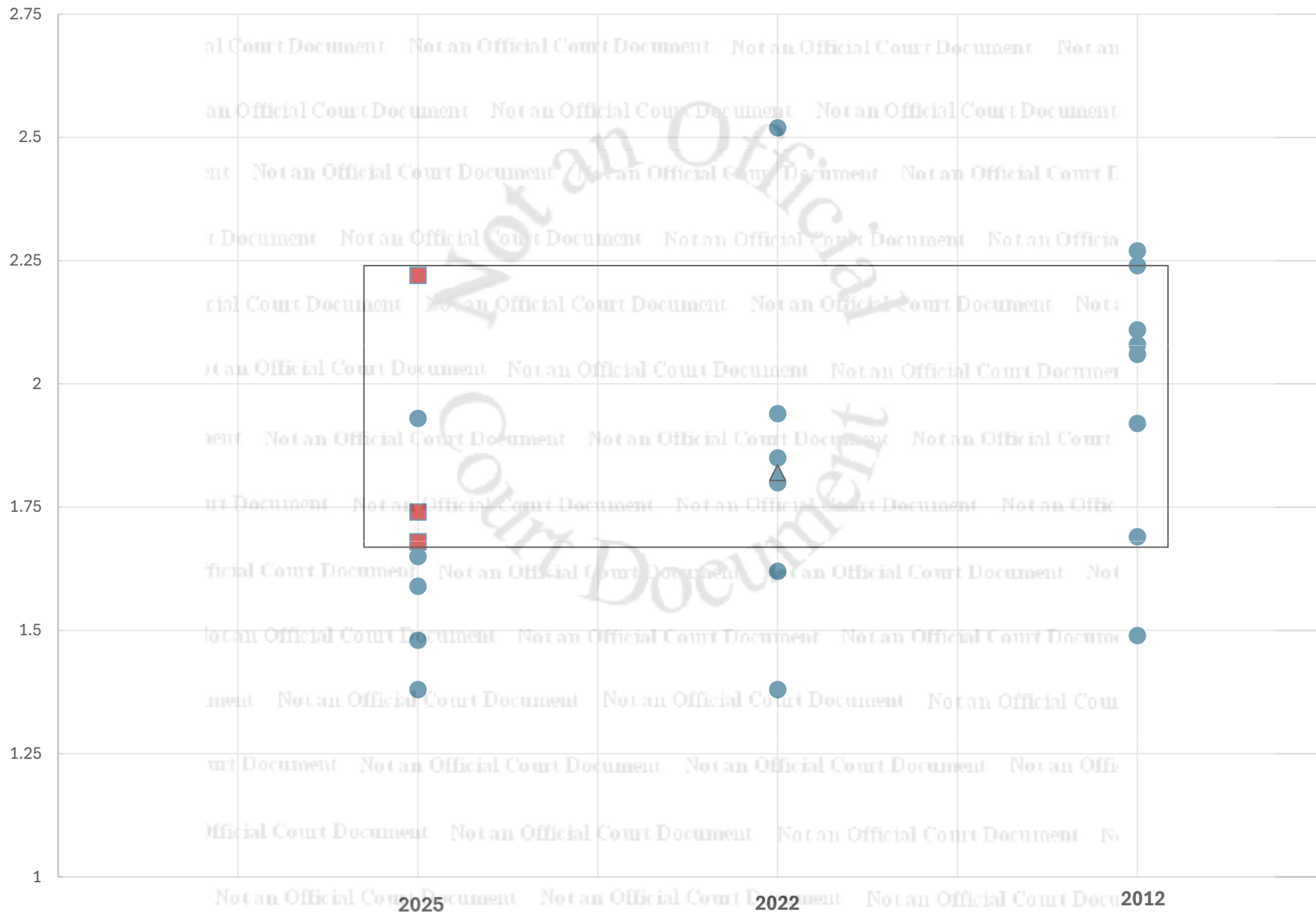


Figure 3. Schwartzberg Scores



## B. Population Deviation

The principal goal of any redistricting plan is to ensure that districts have equal population counts. Following the 2020 Census the total population of Missouri was 6,154,913. With 8 congressional districts this makes the ideal district size 769,364. Table 5 below examines population deviation across Missouri's congressional districts. As shown in the table, the enacted plan is a zero-deviation plan. All eight districts contain exactly 769,364 (the ideal district size) with the exception of District 7 which contains one more person (769,365). The 2025 redistricting plan meets the first and most overriding goal of any redistricting plan, namely ensuring population equality across election districts.

Table 5. District Population, 2025 Congressional Plan

| District | 2020 Population | Deviation |
|----------|-----------------|-----------|
| 1        | 769,364         | 0.00%     |
| 2        | 769,364         | 0.00%     |
| 3        | 769,364         | 0.00%     |
| 4        | 769,364         | 0.00%     |
| 5        | 769,364         | 0.00%     |
| 6        | 769,364         | 0.00%     |
| 7        | 769,365         | 0.00%     |
| 8        | 769,364         | 0.00%     |

## C. Communities of Interest

Another traditional districting principle involves an effort, where possible, to respect existing political boundaries such as counties. In Missouri, the City of St. Louis is an independent city with equivalence to that of a county. The City of St. Louis, therefore, is included in the following analysis of county splits. The table below (Table 6) compares the 2022 Missouri congressional plan to the 2025 plan in reference to the number of counties that are split across districts.<sup>16</sup> The 2025 plan represents a slight improvement on this metric with only 4.3% of the state's counties split. For the 2022 plan 7.8% of counties are split across congressional districts. Stated otherwise, the 2025 plan keeps almost 96% of Missouri's counties wholly contained within one of the state's eight congressional districts.<sup>17</sup>

<sup>16</sup>For the analyses presented on county, municipal, and VTD splits, geographic units split across districts where population is wholly contained within one segment are not counted as being split.

<sup>17</sup>The 2012 plan split eight counties (7.0% of the total).

Table 6. County Splits by Congressional Plan

|                | 2022 Plan      | 2025 Plan      |
|----------------|----------------|----------------|
| Counties Split | 7.8%<br>[9]    | 4.3%<br>[5]    |
| Not Split      | 92.2%<br>[106] | 95.7%<br>[110] |
| Total          | 115            | 115            |

Panel A of Table 7 examines the number of municipalities split across the 2022 and 2025 congressional plans. This calculation includes (1) municipalities that are located in more than one county and that are split across congressional districts, as well as (2) municipalities that are wholly contained within a single county that are split across congressional districts. As with the analysis of county splits, the 2025 plan improves upon the previous 2022 plan in terms of the number of municipalities that are divided across congressional districts. In the 2022 plan 3.3% of Missouri's municipalities were split, as compared to only 1.4% in the 2025 plan.

Panel B of Table 7 examines municipal splits only in the case where a municipality is entirely encompassed within a single county. The logic behind this calculation is related to an established hierarchy whereby the effort to keep counties whole supersedes other geographic units (e.g. municipalities). In the case where a municipality is located in more than one county, it is possible that the municipality may be split across districts in order that the respective counties in which it is located are kept intact. In this case 2.3% of municipalities are split in the 2022 plan, compared to 0.2% of municipalities under the 2025 plan. Based on either calculation, the 2025 plan contains fewer municipalities split across congressional districts than the 2022 plan.

Table 7. Municipality Splits by Congressional Plan

| Panel A              | 2022 Plan      | 2025 Plan      |
|----------------------|----------------|----------------|
| Municipalities Split | 3.3%<br>[31]   | 1.4%<br>[13]   |
| Not Split            | 96.7%<br>[907] | 98.6%<br>[925] |
| Total                | 938            | 938            |
| Panel B              |                |                |
| Municipalities Split | 2.3%<br>[22]   | 0.2%<br>[2]    |
| Not Split            | 97.7%<br>[916] | 99.8%<br>[936] |
| Total                | 938            | 938            |

Another area to examine involves the number of voting tabulation districts (VTDs) that were split between congressional districts. On this metric I compare the 2022 plan to the current plan (2025). The results are summarized in Table 8 below. In the preceding plan there were 46 VTDs split between legislative districts. All told, 99.0% of the VTDs in the previous plan were not split (or were unaffected in population terms) between legislative districts. Looking at the current plan, the number of split VTDs decreases to 42. The percentage of VTDs not split or unaffected in the 2025 plan is 99.1%, representing a very slight improvement over the 2022 plan. Of course, with 99% of VTDs kept whole in the 2022 plan there is little room left for improvement.

Table 8. VTD Splits by Congressional Plan

|            | 2022 Plan        | 2025 Plan        |
|------------|------------------|------------------|
| Split VTDs | 1.0%<br>[46]     | 0.9%<br>[42]     |
| Not Split  | 99.0%<br>[4,588] | 99.1%<br>[4,562] |
| Total VTDs | 4,604            | 4,604            |



## E. District Congruity Analysis

District core retention is another method available to compare two districting plans.<sup>18</sup> In Table 1, core retention for the various plans is measured as the percentage of the population in a new district carried over from the corresponding 2022 district. As such, district core retention is a measure that ranges from 0 to 100. The higher the percentage, the more a district is representative of its former self. For example, CD 1 in the 2025 plan has a core retention score of 93.9%, an indication that this district is almost wholly comprised of population from CD 1 in the 2022 plan. Table 9 also presents mean (average) core retention values for the 2025 plan along with the standard deviation and range.

Table 9. District Core Retention, 2025 Plan

| District | Total Population | Voting Age Population |
|----------|------------------|-----------------------|
| 1        | 93.9%            | 93.8%                 |
| 2        | 77.3%            | 77.2%                 |
| 3        | 60.4%            | 61.3%                 |
| 4        | 61.9%            | 60.9%                 |
| 5        | 42.7%            | 42.7%                 |
| 6        | 79.3%            | 79.3%                 |
| 7        | 100%             | 100%                  |
| 8        | 100%             | 100%                  |
| Mean     | 76.9             | 76.9                  |
| S.D.     | 19.5             | 19.5                  |
| Range    | 57.3             | 57.3                  |

Core retention scores for the 2025 plan range from a low of 43% in District 5 to a high of 100% for Districts 7 and 8. With the exception of District 5, at least three-fifths of a district's population in the 2025 plan was carried over from the 2022 district. The mean (average) core retention score across all districts in the 2025 plan is 77%.

## V. OVERALL OPINION

The plaintiffs in this action allege that three of Missouri's congressional districts associated with the 2025 plan violate the compactness standard set forth in Missouri's Constitution. Redistricting plans are not created in a vacuum. As well, individual districts are themselves components of an overall plan. Given these realities I undertook an analysis of the 2025 plan on a number of metrics, making comparisons back to the previous plans in 2012 and 2022. Where germane, I also compare the challenged districts to the remaining districts within the current congressional plan.

<sup>18</sup>The presence of a district core is closely linked to incumbent electoral success and, as such, is an important element related to protecting incumbents across a redistricting cycle.

Having examined the 2025 congressional plan on a variety of traditional redistricting principles I find that the enacted plan meets a number of stated goals. Among these are population equality and district contiguity which are required under the Missouri Constitution. Further, the 2025 plan is an improvement over the previous plan in terms of maintaining communities of interest in that fewer counties, municipalities, and VTDs are split across congressional districts. In addition, core retention levels for the 2025 plan point to the maintenance of district congruity across plans. With the exception of one district, anywhere from 60% to 100% of a member's constituents were carried over from the 2022-cycle to their new district under the 2025 plan.

As to the question of district compactness more specifically, the 2025 congressional districting plan is overall more compact than the previous plan enacted in 2022 under all three measures of compactness employed. As well, the 2025 plan is also more compact than the 2012 plan. On most measures of compactness challenged Districts 4 and 6 actually became more, not less, compact from 2022 to 2025.<sup>19</sup> Further, using any of the three measures of compactness employed, none of the challenged districts could be considered less compact than the least compact district from the 2012 plan (which, again, passed constitutional muster on this question). Finally, the graphical comparisons demonstrate that the 2025 challenged districts are not extreme outliers in terms of compactness. Instead, there is a great deal of congruence across the 2012, 2022, and 2025 congressional plans in terms of the range of compactness scores across districts. In fact, both the 2012 and 2022 plans contain districts less compact than the 2025 challenged districts (under all three measures). Viewed from this perspective the challenged districts are not extreme outliers in reference to their level of compactness.

Regarding district compactness, again I note it is of importance as to what is being compared to what. Two experts for the plaintiffs, Professor Cervas and Professor Stern, created sets of hypothetical congressional plans. These alternative plans were never introduced in the special legislative session where HB 1 was passed. From this vantage point they are simply counterfactual plans that could have been offered for consideration but were not. Nevertheless, these plans have been proffered as proof that compactness for districts in the congressional plan could be increased over the 2025 plan. It is certainly possible to create a hypothetical congressional districting plan for Missouri where the districts are more compact than those in the 2025 plan. But could such a hypothetical plan take into account all of the criteria considered by the Missouri General Assembly? The answer is almost certainly no. In my opinion only the General Assembly itself is equipped to know what, when, and how criteria that, for example, may fall under communities of interest should be considered in balance with other factors such as population, compactness, and contiguity.<sup>20</sup> Absent detailed interactions with legislators, it is simply not possible for an outsider, like the proponent of a hypothetical alternative plan, to be able to discern the will of the General Assembly as to the exact application of all possible redistricting factors.<sup>21</sup>

<sup>19</sup>The one exception to this statement is the Reock score for CD 4.

<sup>20</sup>Other considerations such as the Federal Voting Rights Act or incumbency protection may also come into play.

<sup>21</sup>The expert reports of Professor Cervas and Professor Stern do not include any interviews with legislators nor any examination of the legislative record regarding the 2025 congressional redistricting.

## VI. DECLARATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on January 7, 2026.

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### Peer-Reviewed Books:

*Rural Republican Realignment in the Modern South: The Untold Story*. 2022.

Columbia, SC: The University of South Carolina Press. (Seth C. McKee, co-author).

[Reviewed in *Public Opinion Quarterly* 87(2): 462-465]

[2025 V.O. Key Award for Best Book in Southern Politics]

*The Rational Southerner: Black Mobilization, Republican Growth, and the Partisan*

*Transformation of the American South*. 2012. New York: Oxford University Press.

(Quentin Kidd and Irwin L. Morris, co-authors).

[Softcover version issued in 2014 with new Epilogue]

### Peer-Reviewed Publications:

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(Seth C. McKee, Enrijeta Shino, and Daniel A. Smith, co-authors).

- “Not a Teammate and Not a Fan: Probing the Identities of Unaffiliated Registered Voters.” Forthcoming 2025. *State Politics and Policy Quarterly*. (Seth C. McKee, Enrijeta Shino, and Daniel A. Smith, co-authors).
- “MAGA Trumps the Incumbency Advantage in a Dueling Incumbent Primary.” 2025. *American Politics Research* 53(2): 103-113. (David A. Hughes and Seth C. McKee, co-authors).
- “The Changing South in Presidential Elections.” 2025. *Party Politics* 31(1): 854-867. (Seth C. McKee, Robert N. Lupton, Enrijeta Shino, and Daniel A. Smith, co-authors).
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- “Taking the Pulse of Georgia Local Election Officials after Senate Bill 202.” 2024. *State and Local Government Review* 56(3): 289-300. (Seth C. McKee, co-author).
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- "Election Daze: Mode of Voting and Voter Preferences in the 2016 Presidential Election." 2017-2018. *Florida Political Chronicle* 25(2): 123-141. (Seth C. McKee and Daniel A. Smith, co-authors).
- "Out of Step and Out of Touch: The Matter with Kansas in the 2014 Midterm." 2017. *The Forum* 15(2): 291-312. (Seth C. McKee and Ian Ostrander, co-authors).
- "From Legal Theory to Practical Application: A How-To for Performing Vote Dilution Analyses." 2018. *Social Science Quarterly* 99(2): 536-552. (Peter A. Morrison and Thomas M. Bryan, co-authors).
- "Race, Class, Religion and the Southern Party System: A Field Report from Dixie." 2016. *The Forum* 14(1): 83-96.
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- "Race and the Tea Party in the Old Dominion: Split-Ticket Voting in the 2013 Virginia Elections." 2015. *PS: Political Science and Politics* 48(1):107-114. (Quentin Kidd and Irwin L. Morris, co-authors).

- “The Damnedest Mess: An Empirical Evaluation of the 1966 Georgia Gubernatorial Election.” 2014. *Social Science Quarterly* 96(1):104-118. (Charles S. Bullock, III, co-author).
- “Candidates, Competition, and the Partisan Press: Congressional Elections in the Early Antebellum Era.” 2014. *American Politics Research* 42(5):670-783. (Jamie L. Carson, co-author).  
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- “Strategic Voting in a U.S. Senate Election.” 2013. *Political Behavior* 35(4):729-751. (Seth C. McKee, co-author).
- “Unwelcome Constituents: Redistricting and Countervailing Partisan Tides.” 2013. *State Politics and Policy Quarterly* 13(2):203-224. (Seth C. McKee, co-author).
- “The Tea Party, Sarah Palin, and the 2010 Congressional Elections: The Aftermath of the Election of Barack Obama.” 2012. *Social Science Quarterly* 93(5):1424-1435. (Charles S. Bullock, III, co-author).
- “Much Ado About Nothing?: An Empirical Assessment of the Georgia Voter Identification Statute.” 2012. *State Politics and Policy Quarterly* 12(4):394-314. (Charles S. Bullock, III, co-author).
- “Achieving Validation: Barack Obama and Black Turnout in 2008.” 2012. *State Politics and Policy Quarterly* 12:3-22. (Seth C. McKee and David Hill, co-authors).
- “They Just Don’t Vote Like They Used To: A Methodology to Empirically Assess Election Fraud.” 2012. *Social Science Quarterly* 93:76-94. (William Gillespie, co-author).
- “An Examination of Efforts to Encourage the Incidence of Early In-Person Voting in Georgia, 2008.” 2011. *Election Law Journal* 10:103-113. (Charles S. Bullock, III, co-author).
- “What Made Carolina Blue? In-migration and the 2008 North Carolina Presidential Vote.” 2010. *American Politics Research* 38:266-302. (Seth C. McKee, co-author).
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- “Trying to Thread the Needle: The Effects of Redistricting in a Georgia Congressional District.” 2009. *PS: Political Science and Politics* 42:679-687. (Seth C. McKee, co-author).
- “Citizen, Defend Thyself: An Individual-Level Analysis of Concealed-Weapon Permit Holders.” 2009. *Criminal Justice Studies* 22:73-89. (Grant W. Neeley, co-author).
- “Two Sides of the Same Coin?: Employing Granger Causality Tests in a Time Series Cross-Section Framework.” 2008. *Political Analysis* 16:324-344. (Quentin Kidd and Irwin L. Morris, co-authors).

- “Worth a Thousand Words?: An Analysis of Georgia’s Voter Identification Statute.” 2008. *American Politics Research* 36:555-579. (Charles S. Bullock, III, co-author).
- “Gerrymandering on Georgia’s Mind: The Effects of Redistricting on Vote Choice in the 2006 Midterm Election.” 2008. *Social Science Quarterly* 89:60-77 (Seth C. McKee, co-author).
- “Examining Methods for Identifying Latino Voters.” 2007. *Election Law Journal* 6:202-208. (Charles S. Bullock, III, co-author).
- “A Mile-Wide Gap: The Evolution of Hispanic Political Emergence in the Deep South.” 2006. *Science Quarterly* 87:1117-1135. (Charles S. Bullock, III, co-author).
- “Punch Cards, Jim Crow, and Al Gore: Explaining Voter Trust in the Electoral System in Georgia, 2000.” 2005. *State Politics and Policy Quarterly* 5:283-294. (Charles S. Bullock, III and Richard Clark, co-authors).
- “When Southern Symbolism Meets the Pork Barrel: Opportunity for Executive Leadership.” 2005. *Social Science Quarterly* 86:69-86. (Charles S. Bullock, III, co-author).
- “Race and the Ideological Transformation of the Democratic Party: Evidence from the Bayou State.” 2005. *American Review of Politics* 25:67-78.
- “The Reintroduction of the *Elephas maximus* to the Southern United States: The Rise of Republican State Parties, 1960-2000.” 2004. *American Politics Research* 31:68-101. (Quentin Kidd and Irwin Morris, co-authors).
- “One Person, [No Vote; One Vote; Two Votes...]: Voting Methods, Ballot Types, and Undervote Frequency in the 2000 Presidential Election.” 2002. *Social Science Quarterly* 83:981-993. (Charles S. Bullock, III, co-author).
- “On the Prospect of Linking Religious Right Identification with Political Behavior: Panacea or Snipe Hunt?” 2002. *Journal for the Scientific Study of Religion* 41:697-710. (Mark C. Smith, co-author).
- “The Key Issue: Constituency Effects and Southern Senators’ Roll-Call Voting on Civil Rights.” 2001. *Legislative Studies Quarterly* 26: 599-621. (Quentin Kidd and Irwin Morris, co-authors).
- “Packin’ in the Hood?: Examining Assumptions Underlying Concealed-Handgun Research.” 2000. *Social Science Quarterly* 81:523-537. (Grant Neeley, co-author).
- “Brother, Can You Spare a Dime? Racial/Ethnic Context and the Anglo Vote on Proposition 187.” 2000. *Social Science Quarterly* 81:194-206. (Irwin Morris, co-author).

- “Penny Pinching or Politics? The Line-Item Veto and Military Construction Appropriations.” 1999. *Political Research Quarterly* 52:753-766. (Irwin Morris and Grant Neeley, co-authors).
- “Of Byrds[s] and Bumpers: Using Democratic Senators to Analyze Political Change in the South, 1960-1995.” 1999. *American Journal of Political Science* 43:465-487. (Quentin Kidd and Irwin Morris, co-authors).
- “Bugs in the NRC’s Doctoral Program Evaluation Data: From Mites to Hissing Cockroaches.” 1998. *PS* 31:829-835. (Nelson Dometrius, Quentin Kidd, and Kurt Shirkey, co-authors).
- “Boll Weevils and Roll-Call Voting: A Study in Time and Space.” 1998. *Legislative Studies Quarterly* 23:245-269. (Irwin Morris, co-author).
- “Give Us Your Tired, Your Poor,...But Make Sure They Have a Green Card: The Effects of Documented and Undocumented Migrant Context on Anglo Opinion Towards Immigration.” 1998. *Political Behavior* 20:1-16. (Irwin Morris, co-author).
- “¡Quedate o Vente!: Uncovering the Determinants of Hispanic Public Opinion Towards Immigration.” 1997. *Political Research Quarterly* 50:627-647. (Irwin Morris and Kurt Shirkey, co-authors).
- “¿Amigo o Enemigo?: Context, Attitudes, and Anglo Public Opinion toward Immigration.” 1997. *Social Science Quarterly* 78: 309-323. (Irwin Morris, co-author).
- Book Chapters:**
- “The Primary that Wasn’t: The 2024 Presidential Nomination Process.” 2025. In *The 2024 Presidential Election in the South*, eds. Branwell DuBose Kapeluck and Scott E. Buchanan. Lanham, MD: Rowman & Littlefield. (Aaron A. Hitefield, co-author).
- “Texas: Republican Resilience.” 2025. In *The New Politics of the Old South*, 8<sup>th</sup> ed., Charles S. Bullock, III and Mark J. Rozell, editors. New York: Rowman and Littlefield Publishers, Inc. (Seth C. McKee, co-author).
- “The 2020 Presidential Nomination Process.” 2021. In *The 2020 Presidential Election in the South*, eds. Branwell DuBose Kapeluck and Scott E. Buchanan. Lanham, MD: Rowman & Littlefield. (Aaron A. Hitefield, co-author).
- “Texas: A Shifting Republican Terrain.” 2021. In *The New Politics of the Old South*, 7<sup>th</sup> ed., Charles S. Bullock, III and Mark J. Rozell, editors. New York: Rowman and Littlefield Publishers, Inc. (Seth C. McKee, co-author).
- “Texas: Big Red Rides On.” 2018. In *The New Politics of the Old South*, 6<sup>th</sup> ed., Charles S. Bullock, III and Mark J. Rozell, editors. New York: Rowman and Littlefield Publishers, Inc. (Seth C. McKee, co-author).



- “The Participatory Consequences of Florida Redistricting.” 2015. In *Jigsaw Puzzle Politics in the Sunshine State*, Seth C. McKee, editor. Gainesville, FL: University of Florida Press. (Danny Hayes and Seth C. McKee, co-authors).
- “Texas: Political Change by the Numbers.” 2014. In *The New Politics of the Old South*, 5<sup>th</sup> ed., Charles S. Bullock, III and Mark J. Rozell, editors. New York: Rowman and Littlefield Publishers, Inc. (Seth C. McKee, co-author).
- “The Republican Party in the South.” 2012. In *Oxford Handbook of Southern Politics*, Charles S. Bullock, III and Mark J. Rozell, editors. New York: Oxford University Press. (Quentin Kidd and Irwin Morris, co-authors).
- “The Reintroduction of the *Elephas maximus* to the Southern United States: The Rise of Republican State Parties, 1960-2000.” 2010. In *Controversies in Voting Behavior*, 5<sup>th</sup> ed., David Kimball, Richard G. Niemi, and Herbert F. Weisberg, editors. Washington, DC: CQ Press. (Quentin Kidd and Irwin Morris, co-authors).  
[Reprint of 2004 *APR* article with Epilogue containing updated analysis and other original material.]
- “The Texas Governors.” 1997. In *Texas Policy and Politics*, Mark Somma, editor. Needham Heights, MA: Simon & Schuster.

#### **Book Reviews:**

- The Resilience of Southern Identity: Why the South Still Matters in the Minds of Its People*. 2018.  
Reviewed for *The Journal of Southern History* 84(1): 233-234.

#### **Other Publications:**

- “Provisionally Admitted College Students: Do They Belong in a Research University?” 1998. In *Developmental Education: Preparing Successful College Students*, Jeanne Higbee and Patricia L. Dwinell, editors. Columbia, SC: National Resource Center for the First-Year Experience & Students in Transition (Don Garnett, co-author).
- NES Technical Report No. 52. 1994. “The Reliability, Validity, and Scalability of the Indicators of Gender Role Beliefs and Feminism in the 1992 American National Election Study: A Report to the ANES Board of Overseers.” (Sue Tolleson-Rinehart, Douglas R. Davenport, Terry L. Gilmour, William R. Moore, Kurt Shirkey, co-authors).

#### **Grant-funded Research (UGA):**

- Principal Investigator. “Tracking Peach State Voter Sentiment in 2024.” Budget: \$25,000. 2024. Funded by the Yankelovich Center, UC-San Diego.

- Principal Investigator. “Gauging the Effects of SB 202 on Non-Precinct Voting in Georgia.” Budget: \$57,193. 2022. Funded by the MIT Election Data and Science Lab.



Co-Principal Investigator. “Georgia Absentee Ballot Signature Verification Study.” Budget: \$36,950. 2021. (with Audrey Haynes and Charles Stewart III). Funded by the Georgia Secretary of State.

Co-Principal Investigator. “The Integrity of Mail Voting in the 2020 Election.” Budget: \$177,080. (with Lonna Atkeson and Robert Stein). Funded by the National Science Foundation.

Co-Principal Investigator. “Georgia Voter Verification Study.” Budget: \$52,060. 2020. (with Audrey Haynes). Funded by the Center for Election Innovation and Research.

Co-Principal Investigator. “An Examination of Non-Precinct Voting in the State of Georgia.” Budget: \$47,000. October 2008-July 2009. (with Charles S. Bullock, III). Funded by the Pew Charitable Trust.

Co-Principal Investigator. “The Best Judges Money Can Buy?: Campaign Contributions and the Texas Supreme Court.” (SES-0615838) Total Budget: \$166,576; UGA Share: \$69,974. September 2006-August 2008. (with Craig F. Emmert). Funded by the National Science Foundation. REU Supplemental Award (2008-2009): \$6,300.

Principal Investigator. “Payola Justice or Just Plain ‘Ole Politics Texas-Style?: Campaign Finance and the Texas Supreme Court.” \$5,175. January 2000-Januray 2001. Funded by the University of Georgia Research Foundation, Inc.

### **Curriculum Grants (UGA):**

Learning Technology Grant: “Converting Ideas Into Effective Action: An Interactive Computer and Classroom Simulation for the Teaching of American Politics.” \$40,000. January-December 2004. (with Loch Johnson). Funded by the Office of Instructional Support and Technology, University of Georgia.

### **Dissertation:**

“Capturing Bubba's Heart and Mind: Group Consciousness and the Political Identification of Southern White Males, 1972-1994.”

Chair: Professor Sue Tolleson-Rinehart

### **Papers and Activities at Professional Meetings:**

“Who Registers Unaffiliated? Evidence from Florida and North Carolina.” 2024. (with Seth C. McKee, Enrijeta Shino, and Daniel A. Smith). Biennial Meeting of the Citadel Symposium on Southern Politics. Charleston, SC.

“Settlement Patterns and Partisanship in the Georgia Electorate.” 2024. (with Seth C. McKee). Annual meeting of the North Carolina Political Science Association. Asheville, NC.

“The Changing South in Presidential Elections.” 2024. (with Robert N. Lupton, Seth C. McKee, Enrijeta Shino, and Daniel A. Smith). Annual Meeting of the Midwest Political Science Association. Chicago, IL.

“The State Giveth and the State Taketh Away: Comparing Voter Behavior in Counties with and Without Early In-Person Voting.” 2024. (Chris Cooper and Seth C. McKee). Annual Meeting of the Election Science, Reform, and Administration Society. Los Angeles, CA.

Roundtable Participant. Panel: Polling is not Dead: Responses to Modern Day Polling Challenges. 2023. Annual Meeting of the Southern Political Science Association. St. Petersburg, FL.

“Where Do Things Stand Now? Assessing the State of the Georgia Electorate Post-2022.” 2023. (with Seth C. McKee). Annual Meeting of the Southern Political Science Association. St. Petersburg, FL.

“Local-Level Implementation of SB 202 in Georgia.” 2023. (with Seth C. McKee). Presented at the annual meeting of the Election Science, Reform & Administration Conference. Athens, GA.

“The Geography of Hispanic Political Behavior in Texas, 2012-2022.” 2023. (with Seth C. McKee). Presented at the annual meeting of the Florida Political Science Association. Stetson University.

“Voter Registration Choices in a Polarized America.” 2023. (with Seth C. McKee, Enrijeta Shino, and Daniel A. Smith). Presented at the annual meeting of the American Political Science Association.

“The Changing South in Presidential Elections.” 2022. (with M.V. Hood III, Robert N. Lupton, and Daniel A. Smith). Presented at the biennial meeting of the Citadel Symposium on Southern Politics. Charleston, SC.

“Was There a Secret Ballot in the 2020 Election?” 2022. (with Lonna Atkeson, Robert Stein, Braeden McNulty, Colin Jones, Mason Reece, and Eli McKown-Dawson). Presented at the Annual Election Sciences, Reform, and Administration Conference. Charlotte, NC.

“Rural Voters in Southern U.S. House Elections.” 2021. (with Seth C. McKee). Presented at the Virtual American Political History Conference. University of Georgia. Athens, GA.

“Mail It In: An Analysis of the Peach State’s Response to the Coronavirus Pandemic.” 2020. (with Audrey Haynes). Presented at the Election Science, Reform, and Administrative Conference. Gainesville, FL. [Virtually Presented].

“Presidential Republicanism and Democratic Darn Near Everything Else.” 2020. (with Seth C. McKee). Presented at the Citadel Southern Politics Symposium. Charleston, SC.

“Why Georgia, Why? Peach State Residents’ Perceptions of Voting-Related Improprieties and their Impact on the 2018 Gubernatorial Election.” 2019. (with Seth C. McKee). Presented at the Election Science, Reform, and Administrative Conference. Philadelphia, PA.

“The Demise of White Class Polarization and the Newest American Politics.” 2019. (with Seth C. McKee). Presented at the Annual Meeting of the Southern Political Science Association. Austin, TX.

“The Geography of Latino Growth in the American South.” 2018. (with Seth C. McKee). State Politics and Policy Conference. State College, PA.

“A History and Analysis of Black Representation in Southern State Legislatures.” 2018. (with Charles S. Bullock, III, William D. Hicks, Seth C. McKee, Adam S. Myers, and Daniel A. Smith). Presented at the Citadel Symposium on Southern Politics. Charleston, SC.

Discussant. Panel titled “Southern Distinctiveness?” 2018. The Citadel Symposium on Southern Politics. Charleston, SC.

Roundtable Participant. Panel titled “The 2018 Elections.” 2018. The Citadel Symposium on Southern Politics. Charleston, SC.

“Still Fighting the Civil War?: Southern Opinions on the Confederate Legacy.” 2018. (with Christopher A. Cooper, Scott H. Huffmon, Quentin Kidd, H. Gibbs Knotts, and Seth C. McKee). The Citadel Symposium on Southern Politics. Charleston, SC.

“Tracking Hispanic Growth in the American South.” 2018. (with Seth C. McKee). Presented at the Annual Meeting of the Southern Political Science Association. New Orleans, LA.

“An Assessment of Online Voter Registration in Georgia.” 2017. (with Greg Hawrelak and Colin Phillips). Presented at the Annual Meeting of Election Sciences, Reform, and Administration. Portland, Oregon.

Moderator. Panel titled “What Happens Next.” 2017. The Annual Meeting of Election Sciences, Reform, and Administration. Portland, Oregon.

“Election Daze: Time of Vote, Mode of Voting, and Voter Preferences in the 2016 Presidential Election.” 2017. (with Seth C. McKee and Dan Smith). Presented at the Annual Meeting of the State Politics and Policy Conference. St. Louis, MO.

“Palmetto Postmortem: Examining the Effects of the South Carolina Voter Identification Statute.” 2017. (with Scott E. Buchanan). Presented at the Annual Meeting of the Southern Political Science Association. New Orleans, LA.

Panel Chair and Presenter. Panel titled “Assessing the 2016 Presidential Election.” 2017. UGA Elections Conference. Athens, GA.

- Roundtable Discussant. Panel titled “Author Meets Critics: Robert Mickey's Paths Out of Dixie.” 2017. The Annual Meeting of the Southern Political Science Association. New Orleans, LA.
- “Out of Step and Out of Touch: The Matter with Kansas in the 2014 Midterm Election.” (with Seth C. McKee and Ian Ostrander). 2016. Presented at the Annual Meeting of the Southern Political Science Association. San Juan, Puerto Rico.
- “Contagious Republicanism in North Carolina and Louisiana, 1966-2008.” (with Jamie Monogan). 2016. Presented at the Citadel Symposium on Southern Politics. Charleston, SC.
- “The Behavioral Implications of Racial Resentment in the South: The Intervening Influence of Party.” (with Quentin Kidd and Irwin L. Morris). 2016. Presented at the Citadel Symposium on Southern Politics. Charleston, SC.
- Discussant. Panel titled “Partisan Realignment in the South.” 2016. The Citadel Symposium on Southern Politics. Charleston, SC.
- “Electoral Implications of Racial Resentment in the South: The Influence of Party.” (with Quentin Kidd and Irwin L. Morris). 2016. Presented at the Annual Meeting of the American Political Science Association. Philadelphia, PA.
- “Racial Resentment and the Tea Party: Taking Regional Differences Seriously.” (with Quentin Kidd and Irwin L. Morris). 2015. Poster presented at the Annual Meeting of the American Political Science Association. San Francisco, CA.
- “Race and the Tea Party in the Palmetto State: Tim Scott, Nikki Haley, Bakari Sellers and the 2014 Elections in South Carolina.” (with Quentin Kidd and Irwin L. Morris). 2015. Presented at the Annual Meeting of the Southern Political Science Association. New Orleans, LA.
- Participant. Roundtable on the 2014 Midterm Elections in the Deep South. Annual Meeting of the Southern Political Science Association. New Orleans, LA.
- “Race and the Tea Party in the Old Dominion: Split-Ticket Voting in the 2013 Virginia Elections.” (with Irwin L. Morris and Quentin Kidd). 2014. Paper presented at the Citadel Symposium on Southern Politics. Charleston, SC.
- “Race and the Tea Party in the Old Dominion: Down-Ticket Voting and Roll-Off in the 2013 Virginia Elections.” (with Irwin L. Morris and Quentin Kidd). 2014. Paper presented at the Annual Meeting of the Southern Political Science Association. New Orleans, LA.
- “Tea Leaves and Southern Politics: Explaining Tea Party Support Among Southern Republicans.” (with Irwin L. Morris and Quentin Kidd). 2013. Paper presented at the Annual Meeting of the Southern Political Science Association. Orlando, FL.



- “The Tea Party and the Southern GOP,” (with Irwin L. Morris and Quentin Kidd). 2012. Research presented at the Effects of the 2012 Elections Conference. Athens, GA.
- “Black Mobilization in the Modern South: When Does Empowerment Matter?” (with Irwin L. Morris and Quentin Kidd). 2012. Paper presented at the Citadel Symposium on Southern Politics. Charleston, SC.
- “The Legislature Chooses a Governor: Georgia’s 1966 Gubernatorial Election.” (with Charles S. Bullock, III). 2012. Paper presented at the Citadel Symposium on Southern Politics. Charleston, SC.
- “One-Stop to Victory? North Carolina, Obama, and the 2008 General Election.” (with Justin Bullock, Paul Carlsen, Perry Joiner, and Mark Owens). 2011. Paper presented at the Annual Meeting of the Southern Political Science Association. New Orleans.
- “Redistricting and Turnout in Black and White.” (with Seth C. McKee and Danny Hayes). 2011. Paper presented at the Annual Meeting of the Midwest Political Science Association. Chicago, IL.
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- “Strategic Voting in the 2010 Florida Senate Election.” (with Seth C. McKee). 2011. Paper Presented at the Annual Meeting of the Florida Political Science Association. Jupiter, FL.
- “The Republican Bottleneck: Congressional Emergence Patterns in a Changing South.” (with Christian R. Grose and Seth C. McKee). Paper presented at the Annual Meeting of the Southern Political Science Association. New Orleans, LA.
- “Capturing the Obama Effect: Black Turnout in Presidential Elections.” (with David Hill and Seth C. McKee) 2010. Paper presented at the Annual Meeting of the Florida Political Science Association. Jacksonville, FL.
- “The Republican Bottleneck: Congressional Emergence Patterns in a Changing South.” (with Seth C. McKee and Christian R. Grose). 2010. Paper presented at the Citadel Symposium on Southern Politics. Charleston, SC.
- “Black Mobilization and Republican Growth in the American South: The More Things Change the More They Stay the Same?” (with Quentin Kidd and Irwin L. Morris). 2010. Paper presented at the Citadel Symposium on Southern Politics. Charleston, SC.
- “Unwelcome Constituents: Redistricting and Incumbent Vote Shares.” (with Seth C. McKee). 2010. Paper presented at the Annual Meeting of the Southern Political Science Association. Atlanta, GA.



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- “The Impact of Efforts to Increase Early Voting in Georgia, 2008.” (With Charles S. Bullock, III). 2009. Presentation made at the Annual Meeting of the Georgia Political Science Association. Callaway Gardens, GA.
- “Encouraging Non-Precinct Voting in Georgia, 2008.” (With Charles S. Bullock, III). 2009. Presentation made at the Time-Shifting The Vote Conference. Reed College, Portland, OR.
- “What Made Carolina Blue? In-migration and the 2008 North Carolina Presidential Vote.” (with Seth C. McKee). 2009. Paper presented at the Annual Meeting of the Florida Political Science Association. Orlando, FL.
- “Swimming with the Tide: Redistricting and Voter Choice in the 2006 Midterm.” (with Seth C. McKee). 2009. Paper presented at the Annual Meeting of the Midwest Political Science Association. Chicago.
- “The Effect of the Partisan Press on U.S. House Elections, 1800-1820.” (with Jamie Carson). 2008. Paper presented at the Annual Meeting of the History of Congress Conference. Washington, D.C.
- “Backward Mapping: Exploring Questions of Representation via Spatial Analysis of Historical Congressional Districts.” (Michael Crespin). 2008. Paper presented at the Annual Meeting of the History of Congress Conference. Washington, D.C.
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- “Personalismo Politics: Partisanship, Presidential Popularity and 21st Century Southern Politics.” (with Quentin Kidd and Irwin L. Morris). 2006. Paper presented at the Annual Meeting of the American Political Science Association. Philadelphia.
- “Explaining Soft Money Transfers in State Gubernatorial Elections.” (with William Gillespie and Troy Gibson). 2006. Paper presented at the Annual Meeting of the Midwest Political Science Association. Chicago.
- “Two Sides of the Same Coin?: A Panel Granger Analysis of Black Electoral Mobilization and GOP Growth in the South, 1960-2004.” (with Quentin Kidd and Irwin L. Morris). 2006. Paper presented at the Citadel Symposium on Southern Politics. Charleston, SC.
- “Hispanic Political Emergence in the Deep South, 2000-2004.” (With Charles S. Bullock, III). 2006. Paper presented at the Citadel Symposium on Southern Politics. Charleston.
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- “Race and the Ideological Transformation of the Democratic Party: Evidence from the Bayou State.” 2004. Paper presented at the Biennial Meeting of the Citadel Southern Politics Symposium. Charleston.
- “Tracing the Evolution of Hispanic Political Emergence in the Deep South.” 2004. (Charles S. Bullock, III). Paper presented at the Biennial Meeting of the Citadel Southern Politics Symposium. Charleston.
- “Much Ado about Something? Religious Right Status in American Politics.” 2003. (With Mark C. Smith). Paper presented at the Annual Meeting of the Midwest Political Science Association. Chicago.
- “Tracking the Flow of Non-Federal Dollars in U. S. Senate Campaigns, 1992-2000.” 2003. (With Janna Deitz and William Gillespie). Paper presented at the Annual Meeting of the Midwest Political Science Association. Chicago.
- “PAC Cash and Votes: Can Money Rent a Vote?” 2002. (With William Gillespie). Paper presented at the Annual Meeting of the Southern Political Science Association. Savannah.

- “What Can Gubernatorial Elections Teach Us About American Politics?: Exploiting and Underutilized Resource.” 2002. (With Quentin Kidd and Irwin L. Morris). Paper presented at the Annual Meeting of the American Political Science Association. Boston.
- “I Know I Voted, But I’m Not Sure It Got Counted.” 2002. (With Charles S. Bullock, III and Richard Clark). Paper presented at the Annual Meeting of the Southwestern Social Science Association. New Orleans.
- “Race and Southern Gubernatorial Elections: A 50-Year Assessment.” 2002. (With Quentin Kidd and Irwin Morris). Paper presented at the Biennial Southern Politics Symposium. Charleston, SC.
- “Top-Down or Bottom-Up?: An Integrated Explanation of Two-Party Development in the South, 1960-2000.” 2001. Paper presented at the Annual Meeting of the Southern Political Science Association. Atlanta.
- “Cash, Congress, and Trade: Did Campaign Contributions Influence Congressional Support for Most Favored Nation Status in China?” 2001. (With William Gillespie). Paper presented at the Annual Meeting of the Southwestern Social Science Association. Fort Worth.
- “Key 50 Years Later: Understanding the Racial Dynamics of 21<sup>st</sup> Century Southern Politics” 2001. (With Quentin Kidd and Irwin Morris). Paper presented at the Annual Meeting of the Southern Political Science Association. Atlanta.
- “The VRA and Beyond: The Political Mobilization of African Americans in the Modern South.” 2001. (With Quentin Kidd and Irwin Morris). Paper presented at the Annual Meeting of the American Political Science Association. San Francisco.
- “Payola Justice or Just Plain ‘Ole Politics Texas Style?: Campaign Finance and the Texas Supreme Court.” 2001. (With Craig Emmert). Paper presented at the Annual Meeting of the Midwest Political Science Association. Chicago.
- “The VRA and Beyond: The Political Mobilization of African Americans in the Modern South.” 2000. (With Irwin Morris and Quentin Kidd). Paper presented at the Annual Meeting of the Southern Political Science Association. Atlanta.
- “Where Have All the Republicans Gone? A State-Level Study of Southern Republicanism.” 1999. (With Irwin Morris and Quentin Kidd). Paper presented at the Annual Meeting of the Southern Political Science Association. Savannah.
- “Elephants in Dixie: A State-Level Analysis of the Rise of the Republican Party in the Modern South.” 1999. (With Irwin Morris and Quentin Kidd). Paper presented at the Annual Meeting of the American Political Science Association. Atlanta.
- “Stimulant to Turnout or Merely a Convenience?: Developing an Early Voter Profile.” 1998. (With Quentin Kidd and Grant Neeley). Paper presented at the Annual Meeting of the Southern Political Science Association. Atlanta.

- “The Impact of the Texas Concealed Weapons Law on Crime Rates: A Policy Analysis for the City of Dallas, 1992-1997.” 1998. (With Grant W. Neeley). Paper presented to the Annual Meeting of the Midwest Political Science Association. Chicago.
- “Analyzing Anglo Voting on Proposition 187: Does Racial/Ethnic Context Really Matter?” 1997. (With Irwin Morris). Paper presented to the Annual Meeting of the Southern Political Science Association. Norfolk.
- “Capturing Bubba's Heart and Mind: Group Consciousness and the Political Identification of Southern White Males, 1972-1994.” 1997. Paper presented at the Annual Meeting of the Midwest Political Science Association. Chicago.
- “Of Byrds[s] and Bumpers: A Pooled Cross-Sectional Study of the Roll-Call Voting Behavior of Democratic Senators from the South, 1960-1995.” 1996. (With Quentin Kidd and Irwin Morris). Paper presented to the Annual Meeting of the Southern Political Science Association. Atlanta.
- “Pest Control: Southern Politics and the Eradication of the Boll Weevil.” 1996. (With Irwin Morris). Paper presented to the Annual Meeting of the American Political Science Association. San Francisco.
- “Fit for the Greater Functions of Politics: Gender, Participation, and Political Knowledge.” 1996. (With Terry Gilmour, Kurt Shirkey, and Sue Tolleson-Rinehart). Paper presented to the Annual Meeting of the Midwest Political Science Association. Chicago.
- “¿Amigo o Enemigo?: Racial Context, Attitudes, and White Public Opinion on Immigration.” 1996. (With Irwin Morris). Paper presented to the Annual Meeting of the Midwest Political Science Association. Chicago.
- “¡Quedate o Vente!: Uncovering the Determinants of Hispanic Public Opinion Towards Immigration.” 1996. (With Irwin Morris and Kurt Shirkey). Paper presented to the Annual Meeting of the Southwestern Political Science Association. Houston.
- “Downs Meets the Boll Weevil: When Southern Democrats Turn Left.” 1995. (With Irwin Morris). Paper presented to the Annual Meeting of the Southern Political Science Association. Tampa.
- “¿Amigo o Enemigo?: Ideological Dispositions of Whites Residing in Heavily Hispanic Areas.” 1995. (With Irwin Morris). Paper presented to the Annual Meeting of the Southern Political Science Association. Tampa.
- Chair. Panel titled “Congress and Interest Groups in Institutional Settings.” 1995. Annual Meeting of the Southwestern Political Science Association. Dallas.
- “Death of the Boll Weevil?: The Decline of Conservative Democrats in the House.” 1995. (With Kurt Shirkey). Paper presented to the Annual Meeting of the Southwestern Political Science Association. Dallas.



“Capturing Bubba’s Heart and Mind: The Political Identification of Southern White Males.”  
1994. (With Sue Tolleson-Rinehart). Paper presented to the Annual Meeting of the Southern  
Political Science Association. Atlanta.

#### **Areas of Teaching Competence:**

American Politics: Behavior and Institutions

Public Policy

Scope, Methods, Techniques

#### **Teaching Experience:**

University of Georgia, 1999-present.

Graduate Faculty, 2003-present.

Provisional Graduate Faculty, 2000-2003.

Distance Education Faculty, 2000-present.

Texas Tech University, 1993-1999.

Visiting Faculty, 1997-1999.

Graduate Faculty, 1998-1999.

Extended Studies Faculty, 1997-1999.

Teaching Assistant, 1993-1997.

#### **Courses Taught:**

##### **Undergraduate:**

American Government and Politics, American Government and Politics (Honors),  
Legislative Process, Introduction to Political Analysis, American Public Policy, Political  
Psychology, Advanced Simulations in American Politics (Honors), Southern Politics,  
Southern Politics (Honors), Survey Research Internship, Survey Research Methods

##### **Graduate:**

Election Administration and Related Issues (Election Sciences), Political Parties and Interest  
Groups, Legislative Process, Seminar in American Politics, Southern Politics; Publishing for  
Political Science

#### **Editorial Boards:**

*Social Science Quarterly*. Member. 2011-present.

*Election Law Journal*. Member. 2013-present.

#### **Other Professional Service:**

Member. ESRA (Election Science, Reform, & Administration) Steering Committee. 2023-  
present.

Listed expert. MIT Election Data and Science Lab.



Keynote Address. 2020 Symposium on Southern Politics, The Citadel, Charleston, SC.

**Institutional Service (University-Level):**

University Information Technology Committee, 2022-present.

University Promotion and Tenure Committee, 2019-2022.

University Program Review Committee, 2009-2011.

Chair, 2010-2011

Vice-Chair, 2009-2010.

Graduate Council, 2005-2008.

Program Committee, 2005-2008.

Chair, Program Committee, 2007-2008.

University Libraries Committee, 2004-2014.

Search Committee for University Librarian and Associate Provost, 2014.