

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO. 21 CVS 015426

NORTH CAROLINA LEAGUE OF
CONSERVATION VOTERS, INC, *et al.*,
Plaintiffs,

COMMON CAUSE; *et al.*
Plaintiff-Intervenor

v.

REPRESENTATIVE DESTIN HALL, in his official
capacity as Chair of the House Standing Committee
on Redistricting, *et al.*

Defendants.

AFFIDAVIT OF RALEIGH MYERS

The undersigned being duly sworn, deposes and says:

1. My name is Raleigh Myers. I have personal knowledge of the matters explained below.
2. I am currently employed by the North Carolina General Assembly as an IT Applications Development Team Leader and have been so employed since 2020. I have primary responsibility for constructing the General Assembly's redistricting databases. I am familiar with the related data holding and processing of that information to produce various district reports. For the 2022 redistricting effort, the U.S. Bureau of the Census' "2020 Census State Redistricting Data (Public Law 94-171) Summary File" was used, as was election contest information available from the North Carolina State Board of Elections. Unless otherwise noted, the information in the

following exhibits draws on that data, as it was incorporated into the General Assembly's 2022 redistricting system.

3. In addition to total population data, the 2022 redistricting database was created to contain election results for 12 specified election contests as follows:

- a. 2016 Presidential.
- b. 2016 Lieutenant Governor.
- c. 2020 Presidential.
- d. 2020 US Senate.
- e. 2020 Governor.
- f. 2020 Lieutenant Governor.
- g. 2020 Attorney General.
- h. 2020 Auditor.
- i. 2020 Commissioner of Agriculture.
- j. 2020 Commissioner of Labor.
- k. 2020 Secretary of State.
- l. 2020 Treasurer.

4. Also included in the 2022 redistricting database were six composite fields calculated across the 12 selected election contests. These composite fields were the total votes for Democrats (All_D), total votes for Republicans (All_R), total vote count (All_TVCO), average contest votes for Democrats (Avg_D), average contest votes for Republicans (Avg_R), and average contest votes cast (Avg_TVCO).

5. The six geographic levels in the 2022 redistricting database are:

- a. Census Block.

- b. Census Block Group.
- c. Census Tract.
- d. Voting District (VTD).
- e. County.
- f. Census Place (Municipality).


6. All_D and All_R are sums of the total votes cast for Democrats or Republicans, respectively, from the 12 election contests. All_TVCO are sums of the total votes cast from each of the 12 election contests. Avg_D and Avg_R were calculated by summing all votes for Democrats or Republicans, respectively, from the 12 election contests, then dividing by 12. Avg_TVCO was calculated by summing the total votes cast for each election contest from the 12 election contests, then dividing by 12. The averages were rounded to represent the integer number of votes.

7. The General Assembly has its own redistricting data processes, which have evolved over the years. The base geographic unit for all district plans is the Census block. All numeric data used by the General Assembly for redistricting purposes must first be taken to that base geographic unit. Decennial Census population data, from the Public Law 94-171 Summary File, is provided to the General Assembly directly at the Census block level. Statewide election results are provided by the North Carolina State Board of Elections at the precinct level. Taking the data from that precinct level down to the Census block level is a matter of distributing votes for each candidate, based on the estimated share of vote contribution by each block within a given precinct. This disaggregation process does not consider any voter characteristics as it is not known, or presumed to be known, how any particular voter may have voted

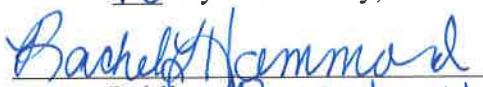
in any particular election contest. A combination of registered voter address information and voter history is used to create an estimation of ballots cast by block and precinct, which are in turn used to create a weighting factor for each block. The weighting factor is implemented as a consistent method to allocate votes to the Census blocks based on the number of ballots cast. Statewide vote totals in the General Assembly system do not precisely match official election results because the data provided to the General Assembly by the State Board of Elections include votes that cannot be assigned to specific precincts. The General Assembly's client mapping and reporting tools ultimately present the information primarily at the whole district level, though the values are summed from the Census block level.

8. In preparing the databases, I had supervisory responsibility while processing was conducted by Paul Andrews in consultation with Dan Frey, both of the North Carolina General Assembly.

This the 18th day of February, 2022.


Raleigh Myers

Sworn and subscribed before me
this the 18 day of February, 2022.


Notary Public Rachel L. Hammond

My commission expires: 20 Sep 2026

