

Attachment A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION**

RODNEY D. PIERCE; *et al.*,

Plaintiffs,

v.

THE NORTH CAROLINA STATE
BOARD OF ELECTIONS; *et al.*,

Defendants.

Case No. 4:23-cv-193-D

SUPPLEMENTAL EXPERT REPORT OF JOHN R. ALFORD, Ph.D.

February 28, 2025

A. Racial Polarized Voting Analysis for the 2024 General Elections

Table 1 below reports the results for an EI analysis of the 2024 general elections for the statewide offices plus Senate Districts 1 and 2.¹ It is similar to the analysis for the 2020 elections reported in Table 6 (page 14) of my previous report dated August 16, 2024. As was true for the 2020 elections, the 2024 elections allow us to draw a useful contrast between multiple elections featuring a White Democratic candidate running against a White Republican candidate, compared to multiple elections featuring a Black Democratic candidate running against a White Republican candidate. This effectively holds the influence of the party of the candidates constant, while varying the race of the Democratic candidate. In eight of the statewide contests, and in the endogenous election in Senate District 1, there is a White Democrat running against a White Republican. In six other statewide contests, and in the endogenous election in Senate District 2, there is a Black Democrat is running against a White Republican. Looking down the column for Black Support, it is clear that in all sixteen contests Black voters consistently give high levels of support to the Democratic candidate and White voters give high levels of support to the Republican candidate.² This is consistent with a polarized response to the candidate based on the party

¹ In my previous report I relied on Dr. Collingwood's reported EI estimates after confirming those results with an independent EI analysis performed under my direction by Dr. Randy Stevenson. Here, I am reporting estimates for 2024 performed again by Dr. Stevenson. The results with associated credible intervals are included in Appendix A.

² The 2024 Governor's contest is unique. Here the Republican candidate, Mark Robinson, is Black and the Democratic candidate, Josh Stein, is White, something that has not occurred previously in a statewide election in the period covered in the election analysis for this case (2016 forward). Black voter behavior in this contest doesn't seem unusual, as they support for Robinson at a very low rate (4%) that is essentially identical to the very low average support level they provide to White Republicans. For White voters the same is not true. Robinson's support from White voters is notably lower than any other Republican candidate. The question is whether voting in this single contest reflects the impact of Robinson's race on voter behavior, or the impact of other issues unique to his 2024 campaign. White voter support for Robinson in 2020, when he was the successful Republican candidate for Lt. Governor, at 75%, was not lower than the 74% average White support for White Republican candidates that year. Robinson bested two White Republicans to win the 2024 Republican primary for Governor, even though voters in that primary are overwhelmingly White.

affiliation indicated on the ballot. This is also fully consistent with the broad pattern in the previous election years discussed in my previous report.

In contrast to the strong impact of candidate party affiliation, the race of the candidates does not appear to have a polarizing impact on vote choice. Statewide, White voters provide 31.5% crossover support to White Democratic candidates and an essentially identical 31.4% crossover support to Black Democratic candidates (note that the average credible interval for the statewide estimates of White crossover vote is .7 percentage points). In Dr. Collingwood's 12-county Demonstration Area, White voters provide 14.6% crossover support to White Democratic candidates and an essentially identical 14.0% crossover support to Black Democratic candidates (note that the average credible interval for the Demonstration Area estimates of White crossover vote is slightly above 3 percentage points).

In the Senate District 1 geography, White voters provide 24.1% crossover support to White Democratic candidates and an essentially identical 24.2% crossover support to Black Democratic candidates (note that the average credible interval for the SD1 estimates of White crossover vote is slightly above 4 percentage points). In the Senate District 2 geography, White voters provide 21.0% crossover support to White Democratic candidates and an essentially identical 20.5% crossover support to Black Democratic candidates (note that the average credible interval for the SD2 estimates of White crossover vote is slightly above 3 percentage points).

If voters were responding to the race of the candidates, we would expect Black voters to provide significantly more support to Black candidates compared to White candidates. Instead, we see that Black voters are no more supportive of the Black Democrat than they are of the White Democrat in any of the areas. Similarly, if White voters were responding to the race of the candidates, we would expect White voters to show increased opposition to a Black candidate,

however, White voters are no more likely to oppose a Black Democrat than they are a White Democrat. This is fully consistent with the broad pattern in the previous election years discussed in my previous report.

Turning to the issue of the proportion of BVAP needed for a district to provide an equal opportunity to elect the preferred candidate of Black voters, the 2024 election analysis is again consistent with the results for previous elections, but we have some additional insight as for the first time in 2024 we have endogenous elections in these two enacted Senate districts. White crossover vote is notably higher in the geography of Senate Districts 1 and 2 than it is in the Demonstration area. With White crossover in the endogenous elections in both districts at or above 20 percent, and Black crossover below 5 percent, the BVAP needed to elect a Black preferred candidate (a Democrat) will very likely fall well below the 47% that Dr. Collingwood suggested based on the Demonstration Area results for earlier elections.

Table 1: 2024 General Elections EI RPV Estimates

| Office | Name | Party | Race | Statewide | | Demonstration Area | | SD 1 | | SD 2 | |
|---------------------------------|----------------------|---------------------|-------|-----------------|-----------------|--------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| | | | | % Black Support | % White Support | % Black Support | % White Support | % Black Support | % White Support | % Black Support | % White Support |
| Lt. Gov. | Rachel Hunt | DEM | White | 97.5% | 33.8% | 98.3% | 16.4% | 96.5% | 25.8% | 96.6% | 23.5% |
| Lt. Gov. | Hal Weatherman | REP | White | 2.5% | 66.2% | 1.7% | 83.6% | 3.5% | 74.2% | 3.4% | 76.5% |
| A. G. | Jeff Jackson | DEM | White | 93.7% | 35.1% | 98.3% | 16.3% | 95.8% | 25.4% | 96.4% | 23.1% |
| A. G. | Dan Bishop | REP | White | 6.3% | 64.9% | 1.7% | 83.7% | 4.2% | 74.6% | 3.6% | 76.9% |
| Sec. of St. | Elaine Marshall | DEM | White | 95.4% | 34.2% | 97.8% | 19.3% | 94.7% | 26.5% | 96.6% | 25.0% |
| Sec. of St. | Chad Brown | REP | White | 4.6% | 65.8% | 2.2% | 80.7% | 5.3% | 73.5% | 3.4% | 75.0% |
| Treas. | Wesley Harris | DEM | White | 95.7% | 29.1% | 98.2% | 13.6% | 95.7% | 22.9% | 97.4% | 19.0% |
| Treas. | Brad Briner | REP | White | 4.3% | 70.9% | 1.8% | 86.4% | 4.3% | 77.1% | 2.6% | 81.0% |
| Agri. Comm | Sarah Taber | DEM | White | 97.0% | 27.5% | 98.2% | 10.9% | 95.0% | 22.3% | 96.4% | 17.3% |
| Agri. Comm | Steve Troxler | REP | White | 3.0% | 72.5% | 1.8% | 89.1% | 5.0% | 77.7% | 3.6% | 82.7% |
| Ins. Comm. | Natasha Marcus | DEM | White | 95.6% | 29.4% | 98.2% | 12.7% | 96.3% | 22.4% | 96.7% | 19.9% |
| Ins. Comm. | Mike Causey | REP | White | 4.4% | 70.6% | 1.8% | 87.3% | 3.7% | 77.6% | 3.3% | 80.1% |
| S. C. Seat 6 | Allison Riggs | DEM | White | 94.9% | 33.1% | 98.2% | 14.9% | 95.2% | 25.2% | 96.4% | 21.4% |
| S. C. Seat 6 | Jefferson G. Griffin | REP | White | 5.1% | 66.9% | 1.8% | 85.1% | 4.8% | 74.8% | 3.6% | 78.6% |
| Apps. Ct. 14 | Ed Eldred | DEM | White | 94.4% | 29.4% | 97.9% | 12.6% | 95.5% | 22.5% | 97.2% | 18.6% |
| Apps. Ct. 14 | Valerie Zachary | REP | White | 5.6% | 70.6% | 2.1% | 87.4% | 4.5% | 77.5% | 2.8% | 81.4% |
| Senate Dist 1 | Susan Harman-Scott | DEM | White | | | | | 95.7% | 23.1% | | |
| Senate Dist 1 | Bobby Hanig | REP | White | | | | | 4.3% | 76.9% | | |
| White Dem. vs White Rep. | | Dem. Average | | 95.5% | 31.5% | 98.1% | 14.6% | 95.6% | 24.1% | 96.7% | 21.0% |
| White Dem. vs White Rep. | | Rep. Average | | 4.5% | 68.5% | 1.9% | 85.4% | 4.4% | 75.9% | 3.3% | 79.0% |
| | | | | | | | | | | | |
| Pres. | Kamala D. Harris | DEM | Black | 94.0% | 32.0% | 97.1% | 12.9% | 92.2% | 24.7% | 96.7% | 20.9% |
| Pres. | Donald J. Trump | REP | White | 6.0% | 68.0% | 2.9% | 87.1% | 7.8% | 75.3% | 3.3% | 79.1% |
| Auditor | Jessica Holmes | DEM | Black | 97.5% | 31.6% | 98.2% | 14.2% | 96.4% | 24.8% | 97.2% | 20.1% |
| Auditor | Dave Boliek | REP | White | 2.5% | 68.4% | 1.8% | 85.8% | 3.6% | 75.2% | 2.8% | 79.9% |
| Labor Comm. | Braxton Winston II | DEM | Black | 95.0% | 28.7% | 98.2% | 12.4% | 95.4% | 22.8% | 96.3% | 18.3% |
| Labor Comm. | Luke Farley | REP | White | 5.0% | 71.3% | 1.8% | 87.6% | 4.6% | 77.2% | 3.7% | 81.7% |
| Apps. Ct. 12 | Carolyn Thompson | DEM | Black | 95.4% | 31.3% | 98.1% | 13.8% | 95.3% | 24.3% | 97.0% | 19.7% |
| Apps. Ct. 12 | Tom Murry | REP | White | 4.6% | 68.7% | 1.9% | 86.2% | 4.7% | 75.7% | 3.0% | 80.3% |
| Apps. Ct. 15 | Martin E. Moore | DEM | Black | 95.5% | 30.2% | 98.0% | 12.4% | 95.7% | 23.0% | 96.4% | 19.0% |
| Apps. Ct. 15 | Chris Freeman | REP | White | 4.5% | 69.8% | 2.0% | 87.6% | 4.3% | 77.0% | 3.6% | 81.0% |
| Super. Pub. Instr. | Maurice Green | DEM | Black | 95.4% | 34.4% | 98.1% | 18.4% | 95.5% | 25.4% | 96.4% | 25.0% |
| Super. Pub. Instr. | Michele Morrow | REP | White | 4.6% | 65.6% | 1.9% | 81.6% | 4.5% | 74.6% | 3.6% | 75.0% |
| Senate Dist 2 | Tare (T) Davis | DEM | Black | | | | | | | 97.4% | 20.7% |
| Senate Dist 2 | Norman Sanderson | REP | White | | | | | | | 2.6% | 79.3% |
| Black Dem. vs White Rep. | | Dem. Average | | 95.5% | 31.4% | 97.9% | 14.0% | 95.1% | 24.2% | 96.7% | 20.5% |
| | | Rep. Average | | 4.5% | 68.6% | 2.1% | 86.0% | 4.9% | 75.8% | 3.3% | 79.5% |
| | | | | | | | | | | | |
| Gov. | Josh Stein | DEM | White | 96.4% | 44.0% | 98.1% | 21.7% | 95.0% | 28.9% | 94.9% | 32.8% |
| Gov. | Mark Robinson | REP | Black | 3.6% | 56.0% | 1.9% | 78.3% | 5.0% | 71.1% | 5.1% | 67.2% |

February 28, 2025.



John R. Alford, Ph.D

APPENDIX A

| Office | Region | Name | Party | Candidate Race | % Black Support | Lower 95% CI | Upper 95% CI | % White Support | Lower 95% CI | Upper 95% CI | % Other Support | Lower 95% CI | Upper 95% CI |
|--|-----------|---------------------------|-------|----------------|-----------------|--------------|--------------|-----------------|--------------|--------------|-----------------|--------------|--------------|
| NC ATTORNEY GENERAL | Statewide | Jeff Jackson | DEM | White | 0.937 | 0.924 | 0.944 | 0.351 | 0.347 | 0.355 | 0.793 | 0.779 | 0.811 |
| NC ATTORNEY GENERAL | Statewide | Dan Bishop | REP | White | 0.063 | 0.056 | 0.076 | 0.649 | 0.645 | 0.653 | 0.207 | 0.189 | 0.221 |
| NC AUDITOR | Statewide | Jessica Holmes | DEM | Black | 0.975 | 0.971 | 0.979 | 0.316 | 0.313 | 0.319 | 0.858 | 0.835 | 0.881 |
| NC AUDITOR | Statewide | Dave Boliek | REP | White | 0.025 | 0.021 | 0.029 | 0.684 | 0.681 | 0.687 | 0.142 | 0.119 | 0.165 |
| NC COMMISSIONER OF AGRICULTURE | Statewide | Sarah Taber | DEM | White | 0.970 | 0.964 | 0.975 | 0.275 | 0.273 | 0.279 | 0.831 | 0.803 | 0.853 |
| NC COMMISSIONER OF AGRICULTURE | Statewide | Steve Troxler | REP | White | 0.030 | 0.025 | 0.036 | 0.725 | 0.721 | 0.727 | 0.169 | 0.147 | 0.197 |
| NC COMMISSIONER OF INSURANCE | Statewide | Natasha Marcus | DEM | White | 0.956 | 0.944 | 0.972 | 0.294 | 0.291 | 0.297 | 0.834 | 0.804 | 0.858 |
| NC COMMISSIONER OF INSURANCE | Statewide | Mike Causey | REP | White | 0.044 | 0.028 | 0.056 | 0.706 | 0.703 | 0.709 | 0.166 | 0.142 | 0.196 |
| NC COMMISSIONER OF LABOR | Statewide | Braxton Winston II | DEM | Black | 0.950 | 0.943 | 0.962 | 0.287 | 0.285 | 0.290 | 0.842 | 0.812 | 0.863 |
| NC COMMISSIONER OF LABOR | Statewide | Luke Farley | REP | White | 0.050 | 0.038 | 0.057 | 0.713 | 0.710 | 0.715 | 0.158 | 0.137 | 0.188 |
| NC COURT OF APPEALS JUDGE SEAT 12 | Statewide | Carolyn Jennings Thompson | DEM | Black | 0.954 | 0.945 | 0.963 | 0.313 | 0.309 | 0.316 | 0.836 | 0.820 | 0.859 |
| NC COURT OF APPEALS JUDGE SEAT 12 | Statewide | Tom Murry | REP | White | 0.046 | 0.037 | 0.055 | 0.687 | 0.684 | 0.691 | 0.164 | 0.141 | 0.180 |
| NC COURT OF APPEALS JUDGE SEAT 14 | Statewide | Ed Eldred | DEM | White | 0.944 | 0.938 | 0.951 | 0.294 | 0.290 | 0.297 | 0.849 | 0.833 | 0.866 |
| NC COURT OF APPEALS JUDGE SEAT 14 | Statewide | Valerie Zachary | REP | White | 0.056 | 0.049 | 0.062 | 0.706 | 0.703 | 0.710 | 0.151 | 0.134 | 0.167 |
| NC COURT OF APPEALS JUDGE SEAT 15 | Statewide | Martin E. Moore | DEM | Black | 0.955 | 0.947 | 0.962 | 0.302 | 0.300 | 0.304 | 0.838 | 0.820 | 0.859 |
| NC COURT OF APPEALS JUDGE SEAT 15 | Statewide | Chris Freeman | REP | White | 0.045 | 0.038 | 0.053 | 0.698 | 0.696 | 0.700 | 0.162 | 0.141 | 0.180 |
| NC GOVERNOR | Statewide | Josh Stein | DEM | White | 0.964 | 0.955 | 0.970 | 0.440 | 0.438 | 0.442 | 0.881 | 0.867 | 0.891 |
| NC GOVERNOR | Statewide | Mark Robinson | REP | Black | 0.036 | 0.030 | 0.045 | 0.560 | 0.558 | 0.562 | 0.119 | 0.109 | 0.133 |
| NC LIEUTENANT GOVERNOR | Statewide | Rachel Hunt | DEM | White | 0.975 | 0.970 | 0.983 | 0.338 | 0.334 | 0.342 | 0.861 | 0.839 | 0.887 |
| NC LIEUTENANT GOVERNOR | Statewide | Hal Weatherman | REP | White | 0.025 | 0.017 | 0.030 | 0.662 | 0.658 | 0.666 | 0.139 | 0.113 | 0.161 |
| NC SECRETARY OF STATE | Statewide | Elaine Marshall | DEM | White | 0.954 | 0.942 | 0.961 | 0.342 | 0.338 | 0.346 | 0.814 | 0.800 | 0.833 |
| NC SECRETARY OF STATE | Statewide | Chad Brown | REP | White | 0.046 | 0.039 | 0.058 | 0.658 | 0.654 | 0.662 | 0.186 | 0.167 | 0.200 |
| NC SUPERINTENDENT OF PUBLIC INSTRUCTION | Statewide | Maurice (Mo) Green | DEM | Black | 0.954 | 0.948 | 0.958 | 0.344 | 0.342 | 0.346 | 0.816 | 0.805 | 0.829 |
| NC SUPERINTENDENT OF PUBLIC INSTRUCTION | Statewide | Michele Morrow | REP | White | 0.046 | 0.042 | 0.052 | 0.656 | 0.654 | 0.658 | 0.184 | 0.171 | 0.195 |
| NC SUPREME COURT ASSOCIATE JUSTICE SEAT 06 | Statewide | Allison Riggs | DEM | White | 0.949 | 0.941 | 0.954 | 0.331 | 0.327 | 0.335 | 0.802 | 0.779 | 0.828 |
| NC SUPREME COURT ASSOCIATE JUSTICE SEAT 06 | Statewide | Jefferson G. Griffin | REP | White | 0.051 | 0.046 | 0.059 | 0.669 | 0.665 | 0.673 | 0.198 | 0.172 | 0.221 |
| NC TREASURER | Statewide | Wesley Harris | DEM | White | 0.957 | 0.948 | 0.965 | 0.291 | 0.288 | 0.294 | 0.823 | 0.803 | 0.841 |
| NC TREASURER | Statewide | Brad Briner | REP | White | 0.043 | 0.035 | 0.052 | 0.709 | 0.706 | 0.712 | 0.177 | 0.159 | 0.197 |
| US PRESIDENT | Statewide | Kamala D. Harris | DEM | Black | 0.940 | 0.931 | 0.949 | 0.320 | 0.312 | 0.329 | 0.755 | 0.718 | 0.789 |
| US PRESIDENT | Statewide | Donald J. Trump | REP | White | 0.060 | 0.051 | 0.069 | 0.680 | 0.671 | 0.688 | 0.245 | 0.211 | 0.282 |

| Office | Region | Name | Party | Candidate Race | % Black Support | Lower 95% CI | Upper 95% CI | % White Support | Lower 95% CI | Upper 95% CI | % Other Support | Lower 95% CI | Upper 95% CI |
|--|-----------|---------------------------|-------|----------------|-----------------|--------------|--------------|-----------------|--------------|--------------|-----------------|--------------|--------------|
| NC ATTORNEY GENERAL | Demo Area | Jeff Jackson | DEM | White | 0.983 | 0.974 | 0.990 | 0.163 | 0.149 | 0.179 | 0.836 | 0.735 | 0.918 |
| NC ATTORNEY GENERAL | Demo Area | Dan Bishop | REP | White | 0.017 | 0.010 | 0.026 | 0.837 | 0.821 | 0.851 | 0.164 | 0.082 | 0.265 |
| NC AUDITOR | Demo Area | Jessica Holmes | DEM | Black | 0.982 | 0.971 | 0.989 | 0.142 | 0.123 | 0.161 | 0.853 | 0.746 | 0.932 |
| NC AUDITOR | Demo Area | Dave Boliek | REP | White | 0.018 | 0.011 | 0.029 | 0.858 | 0.839 | 0.877 | 0.147 | 0.068 | 0.254 |
| NC COMMISSIONER OF AGRICULTURE | Demo Area | Sarah Taber | DEM | White | 0.982 | 0.971 | 0.989 | 0.109 | 0.095 | 0.125 | 0.821 | 0.701 | 0.910 |
| NC COMMISSIONER OF AGRICULTURE | Demo Area | Steve Troxler | REP | White | 0.018 | 0.011 | 0.029 | 0.891 | 0.875 | 0.905 | 0.179 | 0.090 | 0.299 |
| NC COMMISSIONER OF INSURANCE | Demo Area | Natasha Marcus | DEM | White | 0.982 | 0.974 | 0.990 | 0.127 | 0.114 | 0.140 | 0.827 | 0.714 | 0.924 |
| NC COMMISSIONER OF INSURANCE | Demo Area | Mike Causey | REP | White | 0.018 | 0.010 | 0.026 | 0.873 | 0.860 | 0.886 | 0.173 | 0.076 | 0.286 |
| NC COMMISSIONER OF LABOR | Demo Area | Braxton Winston II | DEM | Black | 0.982 | 0.972 | 0.990 | 0.124 | 0.107 | 0.143 | 0.812 | 0.682 | 0.912 |
| NC COMMISSIONER OF LABOR | Demo Area | Luke Farley | REP | White | 0.018 | 0.010 | 0.028 | 0.876 | 0.857 | 0.893 | 0.188 | 0.088 | 0.318 |
| NC COURT OF APPEALS JUDGE SEAT 12 | Demo Area | Carolyn Jennings Thompson | DEM | Black | 0.981 | 0.969 | 0.988 | 0.138 | 0.124 | 0.155 | 0.844 | 0.748 | 0.924 |
| NC COURT OF APPEALS JUDGE SEAT 12 | Demo Area | Tom Murry | REP | White | 0.019 | 0.012 | 0.031 | 0.862 | 0.845 | 0.876 | 0.156 | 0.076 | 0.252 |
| NC COURT OF APPEALS JUDGE SEAT 14 | Demo Area | Ed Eldred | DEM | White | 0.979 | 0.968 | 0.987 | 0.126 | 0.111 | 0.145 | 0.831 | 0.718 | 0.919 |
| NC COURT OF APPEALS JUDGE SEAT 14 | Demo Area | Valerie Zachary | REP | White | 0.021 | 0.013 | 0.032 | 0.874 | 0.855 | 0.889 | 0.169 | 0.081 | 0.282 |
| NC COURT OF APPEALS JUDGE SEAT 15 | Demo Area | Martin E. Moore | DEM | Black | 0.980 | 0.967 | 0.989 | 0.124 | 0.107 | 0.143 | 0.838 | 0.702 | 0.949 |
| NC COURT OF APPEALS JUDGE SEAT 15 | Demo Area | Chris Freeman | REP | White | 0.020 | 0.011 | 0.033 | 0.876 | 0.857 | 0.893 | 0.162 | 0.051 | 0.298 |
| NC GOVERNOR | Demo Area | Josh Stein | DEM | White | 0.981 | 0.971 | 0.988 | 0.217 | 0.199 | 0.237 | 0.824 | 0.680 | 0.920 |
| NC GOVERNOR | Demo Area | Mark Robinson | REP | Black | 0.019 | 0.012 | 0.029 | 0.783 | 0.763 | 0.801 | 0.176 | 0.080 | 0.320 |
| NC LIEUTENANT GOVERNOR | Demo Area | Rachel Hunt | DEM | White | 0.983 | 0.973 | 0.990 | 0.164 | 0.146 | 0.181 | 0.851 | 0.749 | 0.930 |
| NC LIEUTENANT GOVERNOR | Demo Area | Hal Weatherman | REP | White | 0.017 | 0.010 | 0.027 | 0.836 | 0.819 | 0.854 | 0.149 | 0.070 | 0.251 |
| NC SECRETARY OF STATE | Demo Area | Elaine Marshall | DEM | White | 0.978 | 0.967 | 0.988 | 0.193 | 0.177 | 0.210 | 0.862 | 0.758 | 0.945 |
| NC SECRETARY OF STATE | Demo Area | Chad Brown | REP | White | 0.022 | 0.012 | 0.033 | 0.807 | 0.790 | 0.823 | 0.138 | 0.055 | 0.242 |
| NC SUPERINTENDENT OF PUBLIC INSTRUCTION | Demo Area | Maurice (Mo) Green | DEM | Black | 0.981 | 0.966 | 0.989 | 0.184 | 0.167 | 0.204 | 0.810 | 0.659 | 0.919 |
| NC SUPERINTENDENT OF PUBLIC INSTRUCTION | Demo Area | Michele Morrow | REP | White | 0.019 | 0.011 | 0.034 | 0.816 | 0.796 | 0.833 | 0.190 | 0.081 | 0.341 |
| NC SUPREME COURT ASSOCIATE JUSTICE SEAT 06 | Demo Area | Allison Riggs | DEM | White | 0.982 | 0.971 | 0.990 | 0.149 | 0.133 | 0.168 | 0.823 | 0.706 | 0.913 |
| NC SUPREME COURT ASSOCIATE JUSTICE SEAT 06 | Demo Area | Jefferson G. Griffin | REP | White | 0.018 | 0.010 | 0.029 | 0.851 | 0.832 | 0.867 | 0.177 | 0.087 | 0.294 |
| NC TREASURER | Demo Area | Wesley Harris | DEM | White | 0.982 | 0.971 | 0.989 | 0.136 | 0.119 | 0.154 | 0.848 | 0.723 | 0.929 |
| NC TREASURER | Demo Area | Brad Briner | REP | White | 0.018 | 0.011 | 0.029 | 0.864 | 0.846 | 0.881 | 0.152 | 0.071 | 0.277 |
| US PRESIDENT | Demo Area | Kamala D. Harris | DEM | Black | 0.971 | 0.957 | 0.983 | 0.129 | 0.116 | 0.149 | 0.793 | 0.666 | 0.882 |
| US PRESIDENT | Demo Area | Donald J. Trump | REP | White | 0.029 | 0.017 | 0.043 | 0.871 | 0.851 | 0.884 | 0.207 | 0.118 | 0.334 |

| Office | Region | Name | Party | Candidate Race | % Black Support | Lower 95% CI | Upper 95% CI | % White Support | Lower 95% CI | Upper 95% CI | % Other Support | Lower 95% CI | Upper 95% CI |
|--|--------|---------------------------|-------|----------------|-----------------|--------------|--------------|-----------------|--------------|--------------|-----------------|--------------|--------------|
| NC ATTORNEY GENERAL | SD 1 | Jeff Jackson | DEM | White | 0.958 | 0.931 | 0.978 | 0.254 | 0.230 | 0.278 | 0.618 | 0.329 | 0.876 |
| NC ATTORNEY GENERAL | SD 1 | Dan Bishop | REP | White | 0.042 | 0.022 | 0.069 | 0.746 | 0.722 | 0.770 | 0.382 | 0.124 | 0.671 |
| NC AUDITOR | SD 1 | Jessica Holmes | DEM | Black | 0.964 | 0.935 | 0.983 | 0.248 | 0.230 | 0.266 | 0.631 | 0.334 | 0.868 |
| NC AUDITOR | SD 1 | Dave Boliek | REP | White | 0.036 | 0.017 | 0.065 | 0.752 | 0.734 | 0.770 | 0.369 | 0.132 | 0.666 |
| NC COMMISSIONER OF AGRICULTURE | SD 1 | Sarah Taber | DEM | White | 0.950 | 0.916 | 0.975 | 0.223 | 0.207 | 0.240 | 0.651 | 0.362 | 0.878 |
| NC COMMISSIONER OF AGRICULTURE | SD 1 | Steve Troxler | REP | White | 0.050 | 0.025 | 0.084 | 0.777 | 0.760 | 0.793 | 0.349 | 0.122 | 0.638 |
| NC COMMISSIONER OF INSURANCE | SD 1 | Natasha Marcus | DEM | White | 0.963 | 0.933 | 0.985 | 0.224 | 0.206 | 0.244 | 0.691 | 0.392 | 0.899 |
| NC COMMISSIONER OF INSURANCE | SD 1 | Mike Causey | REP | White | 0.037 | 0.015 | 0.067 | 0.776 | 0.756 | 0.794 | 0.309 | 0.101 | 0.608 |
| NC COMMISSIONER OF LABOR | SD 1 | Braxton Winston II | DEM | Black | 0.954 | 0.917 | 0.979 | 0.228 | 0.208 | 0.250 | 0.635 | 0.311 | 0.884 |
| NC COMMISSIONER OF LABOR | SD 1 | Luke Farley | REP | White | 0.046 | 0.021 | 0.083 | 0.772 | 0.750 | 0.792 | 0.365 | 0.116 | 0.689 |
| NC COURT OF APPEALS JUDGE SEAT 12 | SD 1 | Carolyn Jennings Thompson | DEM | Black | 0.953 | 0.911 | 0.976 | 0.243 | 0.224 | 0.265 | 0.656 | 0.411 | 0.882 |
| NC COURT OF APPEALS JUDGE SEAT 12 | SD 1 | Tom Murry | REP | White | 0.047 | 0.024 | 0.089 | 0.757 | 0.735 | 0.776 | 0.344 | 0.118 | 0.589 |
| NC COURT OF APPEALS JUDGE SEAT 14 | SD 1 | Ed Eldred | DEM | White | 0.955 | 0.926 | 0.979 | 0.225 | 0.206 | 0.247 | 0.657 | 0.388 | 0.887 |
| NC COURT OF APPEALS JUDGE SEAT 14 | SD 1 | Valerie Zachary | REP | White | 0.045 | 0.021 | 0.074 | 0.775 | 0.753 | 0.794 | 0.343 | 0.113 | 0.612 |
| NC COURT OF APPEALS JUDGE SEAT 15 | SD 1 | Martin E. Moore | DEM | Black | 0.957 | 0.924 | 0.979 | 0.230 | 0.209 | 0.253 | 0.648 | 0.350 | 0.903 |
| NC COURT OF APPEALS JUDGE SEAT 15 | SD 1 | Chris Freeman | REP | White | 0.043 | 0.021 | 0.076 | 0.770 | 0.747 | 0.791 | 0.352 | 0.097 | 0.650 |
| NC GOVERNOR | SD 1 | Josh Stein | DEM | White | 0.950 | 0.914 | 0.976 | 0.289 | 0.272 | 0.311 | 0.624 | 0.323 | 0.869 |
| NC GOVERNOR | SD 1 | Mark Robinson | REP | Black | 0.050 | 0.024 | 0.086 | 0.711 | 0.689 | 0.728 | 0.376 | 0.131 | 0.677 |
| NC LIEUTENANT GOVERNOR | SD 1 | Rachel Hunt | DEM | White | 0.965 | 0.940 | 0.983 | 0.258 | 0.241 | 0.277 | 0.642 | 0.324 | 0.883 |
| NC LIEUTENANT GOVERNOR | SD 1 | Hal Weatherman | REP | White | 0.035 | 0.017 | 0.060 | 0.742 | 0.723 | 0.759 | 0.358 | 0.117 | 0.676 |
| NC SECRETARY OF STATE | SD 1 | Elaine Marshall | DEM | White | 0.947 | 0.912 | 0.974 | 0.265 | 0.247 | 0.289 | 0.698 | 0.446 | 0.894 |
| NC SECRETARY OF STATE | SD 1 | Chad Brown | REP | White | 0.053 | 0.026 | 0.088 | 0.735 | 0.711 | 0.753 | 0.302 | 0.106 | 0.554 |
| NC SUPERINTENDENT OF PUBLIC INSTRUCTION | SD 1 | Maurice (Mo) Green | DEM | Black | 0.955 | 0.923 | 0.976 | 0.254 | 0.237 | 0.276 | 0.698 | 0.429 | 0.887 |
| NC SUPERINTENDENT OF PUBLIC INSTRUCTION | SD 1 | Michele Morrow | REP | White | 0.045 | 0.024 | 0.077 | 0.746 | 0.724 | 0.763 | 0.302 | 0.113 | 0.571 |
| NC SUPREME COURT ASSOCIATE JUSTICE SEAT 06 | SD 1 | Allison Riggs | DEM | White | 0.952 | 0.919 | 0.981 | 0.252 | 0.234 | 0.273 | 0.652 | 0.369 | 0.887 |
| NC SUPREME COURT ASSOCIATE JUSTICE SEAT 06 | SD 1 | Jefferson G. Griffin | REP | White | 0.048 | 0.019 | 0.081 | 0.748 | 0.727 | 0.766 | 0.348 | 0.113 | 0.631 |
| NC TREASURER | SD 1 | Wesley Harris | DEM | White | 0.957 | 0.928 | 0.979 | 0.229 | 0.210 | 0.256 | 0.678 | 0.366 | 0.887 |
| NC TREASURER | SD 1 | Brad Briner | REP | White | 0.043 | 0.021 | 0.072 | 0.771 | 0.744 | 0.790 | 0.322 | 0.113 | 0.634 |
| US PRESIDENT | SD 1 | Kamala D. Harris | DEM | Black | 0.922 | 0.838 | 0.961 | 0.247 | 0.226 | 0.277 | 0.533 | 0.314 | 0.797 |
| US PRESIDENT | SD 1 | Donald J. Trump | REP | White | 0.078 | 0.039 | 0.162 | 0.753 | 0.723 | 0.774 | 0.467 | 0.203 | 0.686 |
| NC STATE SENATE DISTRICT 01 | SD 1 | Susan Harman-Scott | DEM | White | 0.957 | 0.919 | 0.980 | 0.231 | 0.212 | 0.258 | 0.682 | 0.371 | 0.899 |
| NC STATE SENATE DISTRICT 01 | SD 1 | Bobby Hanig | REP | White | 0.043 | 0.020 | 0.081 | 0.769 | 0.742 | 0.788 | 0.318 | 0.101 | 0.629 |

| Office | Region | Name | Party | Candidate Race | % Black Support | Lower 95% CI | Upper 95% CI | % White Support | Lower 95% CI | Upper 95% CI | % Other Support | Lower 95% CI | Upper 95% CI |
|--|--------|---------------------------|-------|----------------|-----------------|--------------|--------------|-----------------|--------------|--------------|-----------------|--------------|--------------|
| NC ATTORNEY GENERAL | SD 2 | Jeff Jackson | DEM | White | 0.964 | 0.933 | 0.985 | 0.231 | 0.217 | 0.248 | 0.829 | 0.682 | 0.925 |
| NC ATTORNEY GENERAL | SD 2 | Dan Bishop | REP | White | 0.036 | 0.015 | 0.067 | 0.769 | 0.752 | 0.783 | 0.171 | 0.075 | 0.318 |
| NC AUDITOR | SD 2 | Jessica Holmes | DEM | Black | 0.972 | 0.948 | 0.988 | 0.201 | 0.182 | 0.220 | 0.796 | 0.634 | 0.919 |
| NC AUDITOR | SD 2 | Dave Boliek | REP | White | 0.028 | 0.012 | 0.052 | 0.799 | 0.780 | 0.818 | 0.204 | 0.081 | 0.366 |
| NC COMMISSIONER OF AGRICULTURE | SD 2 | Sarah Taber | DEM | White | 0.964 | 0.934 | 0.984 | 0.173 | 0.158 | 0.188 | 0.764 | 0.589 | 0.902 |
| NC COMMISSIONER OF AGRICULTURE | SD 2 | Steve Troxler | REP | White | 0.036 | 0.016 | 0.066 | 0.827 | 0.812 | 0.842 | 0.236 | 0.098 | 0.411 |
| NC COMMISSIONER OF INSURANCE | SD 2 | Natasha Marcus | DEM | White | 0.967 | 0.929 | 0.986 | 0.199 | 0.182 | 0.216 | 0.729 | 0.550 | 0.886 |
| NC COMMISSIONER OF INSURANCE | SD 2 | Mike Causey | REP | White | 0.033 | 0.014 | 0.071 | 0.801 | 0.784 | 0.818 | 0.271 | 0.114 | 0.450 |
| NC COMMISSIONER OF LABOR | SD 2 | Braxton Winston II | DEM | Black | 0.963 | 0.937 | 0.982 | 0.183 | 0.166 | 0.202 | 0.782 | 0.610 | 0.905 |
| NC COMMISSIONER OF LABOR | SD 2 | Luke Farley | REP | White | 0.037 | 0.018 | 0.063 | 0.817 | 0.798 | 0.834 | 0.218 | 0.095 | 0.390 |
| NC COURT OF APPEALS JUDGE SEAT 12 | SD 2 | Carolyn Jennings Thompson | DEM | Black | 0.970 | 0.950 | 0.985 | 0.197 | 0.183 | 0.212 | 0.810 | 0.671 | 0.920 |
| NC COURT OF APPEALS JUDGE SEAT 12 | SD 2 | Tom Murry | REP | White | 0.030 | 0.015 | 0.050 | 0.803 | 0.788 | 0.817 | 0.190 | 0.080 | 0.329 |
| NC COURT OF APPEALS JUDGE SEAT 14 | SD 2 | Ed Eldred | DEM | White | 0.972 | 0.949 | 0.987 | 0.186 | 0.170 | 0.201 | 0.794 | 0.652 | 0.906 |
| NC COURT OF APPEALS JUDGE SEAT 14 | SD 2 | Valerie Zachary | REP | White | 0.028 | 0.013 | 0.051 | 0.814 | 0.799 | 0.830 | 0.206 | 0.094 | 0.348 |
| NC COURT OF APPEALS JUDGE SEAT 15 | SD 2 | Martin E. Moore | DEM | Black | 0.964 | 0.937 | 0.983 | 0.190 | 0.173 | 0.208 | 0.776 | 0.620 | 0.898 |
| NC COURT OF APPEALS JUDGE SEAT 15 | SD 2 | Chris Freeman | REP | White | 0.036 | 0.017 | 0.063 | 0.810 | 0.792 | 0.827 | 0.224 | 0.102 | 0.380 |
| NC GOVERNOR | SD 2 | Josh Stein | DEM | White | 0.949 | 0.916 | 0.976 | 0.328 | 0.304 | 0.347 | 0.760 | 0.576 | 0.897 |
| NC GOVERNOR | SD 2 | Mark Robinson | REP | Black | 0.051 | 0.024 | 0.084 | 0.672 | 0.653 | 0.696 | 0.240 | 0.103 | 0.424 |
| NC LIEUTENANT GOVERNOR | SD 2 | Rachel Hunt | DEM | White | 0.966 | 0.939 | 0.984 | 0.235 | 0.218 | 0.254 | 0.792 | 0.624 | 0.913 |
| NC LIEUTENANT GOVERNOR | SD 2 | Hal Weatherman | REP | White | 0.034 | 0.016 | 0.061 | 0.765 | 0.746 | 0.782 | 0.208 | 0.087 | 0.376 |
| NC SECRETARY OF STATE | SD 2 | Elaine Marshall | DEM | White | 0.966 | 0.940 | 0.983 | 0.250 | 0.237 | 0.265 | 0.800 | 0.663 | 0.920 |
| NC SECRETARY OF STATE | SD 2 | Chad Brown | REP | White | 0.034 | 0.017 | 0.060 | 0.750 | 0.735 | 0.763 | 0.200 | 0.080 | 0.337 |
| NC SUPERINTENDENT OF PUBLIC INSTRUCTION | SD 2 | Maurice (Mo) Green | DEM | Black | 0.964 | 0.937 | 0.982 | 0.250 | 0.234 | 0.269 | 0.748 | 0.555 | 0.906 |
| NC SUPERINTENDENT OF PUBLIC INSTRUCTION | SD 2 | Michele Morrow | REP | White | 0.036 | 0.018 | 0.063 | 0.750 | 0.731 | 0.766 | 0.252 | 0.094 | 0.445 |
| NC SUPREME COURT ASSOCIATE JUSTICE SEAT 06 | SD 2 | Allison Riggs | DEM | White | 0.964 | 0.938 | 0.983 | 0.214 | 0.199 | 0.229 | 0.806 | 0.662 | 0.928 |
| NC SUPREME COURT ASSOCIATE JUSTICE SEAT 06 | SD 2 | Jefferson G. Griffin | REP | White | 0.036 | 0.017 | 0.062 | 0.786 | 0.771 | 0.801 | 0.194 | 0.072 | 0.338 |
| NC TREASURER | SD 2 | Wesley Harris | DEM | White | 0.974 | 0.955 | 0.987 | 0.190 | 0.175 | 0.208 | 0.772 | 0.585 | 0.908 |
| NC TREASURER | SD 2 | Brad Briner | REP | White | 0.026 | 0.013 | 0.045 | 0.810 | 0.792 | 0.825 | 0.228 | 0.092 | 0.415 |
| US PRESIDENT | SD 2 | Kamala D. Harris | DEM | Black | 0.967 | 0.940 | 0.985 | 0.209 | 0.193 | 0.227 | 0.584 | 0.428 | 0.725 |
| US PRESIDENT | SD 2 | Donald J. Trump | REP | White | 0.033 | 0.015 | 0.060 | 0.791 | 0.773 | 0.807 | 0.416 | 0.275 | 0.572 |
| NC STATE SENATE DISTRICT 02 | SD 2 | Tare (T) Davis | DEM | Black | 0.974 | 0.956 | 0.987 | 0.207 | 0.188 | 0.223 | 0.809 | 0.666 | 0.916 |
| NC STATE SENATE DISTRICT 02 | SD 2 | Norman W. Sanderson | REP | White | 0.026 | 0.013 | 0.044 | 0.793 | 0.777 | 0.812 | 0.191 | 0.084 | 0.334 |

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION**

RODNEY D. PIERCE, *et al.*,

Plaintiffs,

v.

THE NORTH CAROLINA STATE
BOARD OF ELECTIONS, *et al.*,

Defendants.

Case No. 4:23-cv-193-D

SUPPLEMENTAL REBUTTAL EXPERT REPORT OF JOHN R. ALFORD, Ph.D.

March 7, 2025

I have been retained by counsel for Legislative Defendants, as an expert to provide analysis related to Gingles prongs 2 and 3, and racially polarized voting as related to the challenge to the senate maps for the State of North Carolina. I have been asked by counsel to examine and respond to the February 28, 2025, Supplemental Report provided by the plaintiffs' expert, Dr. Loren Collingwood (the "Supplemental Report"), and the associated data and materials provided in that disclosure, concerning the 2024 elections in North Carolina. This report is intended to supplement my prior reports in this case.

A. The Race of Candidates

Tables 1 and 2 below provide a comparison of my 2024 EI results to those reported by Dr. Collingwood in his Supplemental Report. To aid in visibility, the results are divided, with Table 1 comparing the EI estimates for White Voters and Table 2 comparing the EI estimates for Black voters. My estimates are taken directly from my supplemental report dated February 28, 2025, and Dr. Collingwood's estimates are from his backup files provide with his February 28, 2025, Supplemental Report.

In my report dated August 16, 2024, I chose to rely on Dr. Collingwood's EI estimates because my replication produced substantively similar results. The same can be said for the 2024 EI results. Nothing in my conclusions would be changed based on the relatively slight differences. That said, the small differences between the results in my reports and those in Dr. Collingwood's reports are not random; they appear to be due to a difference in choice of methodology.

Specifically, Dr. Collingwood appears to be employing an older version of the EI technique. Dr. King's original formulation of what has come to be called King's EI was limited to providing estimates for 2x2 tables and could not be used to estimate larger (RxC) tables, like what we have here. King also offered an early iterative procedure for estimating larger tables while recognizing that it was problematic, and that a more appropriate RxC technique was possible, but

computationally prohibitive. This was followed shortly by the introduction by Dr. King and colleagues of a non-iterative RxC technique that they viewed as preferable. My report relies on this preferable non-iterative RxC technique. Dr. Collingwood relies for his EI estimates on the older iterative version. While in most cases, where the underlying election data is robust, the difference in the estimates produced by these techniques is insignificant, they can also be noticeable as they are here.

There is a general tendency for Dr. Collingwood's estimates to show slightly higher Black cohesion and slightly lower White crossover when compared to my estimates. For example, on average, in 2024 my results show Black voters supporting the Democratic candidates at about 95 to 96%, while the comparable estimate from Dr. Collingwood is at 99%. Turning to White crossover voting, White voters in my 2024 analysis are crossing over to support Democratic candidates at about 31-32%, compared to 27 to 28% in Dr. Collingwood's estimates. In any case, the results in my supplemental report are roughly comparable to the New York Times exit poll estimates for North Carolina in 2024. The New York Times exit poll estimates showed White support for Harris at 33%, and my estimates in Table 1 indicates White support for Harris at 32% while Dr. Collingwood's estimate is 27%. Similarly, the Times exit poll had Black voter support for Trump at 7%, and my estimate in Table 2 indicates Black support for Trump at 6% while Dr. Collingwood's estimate is 1.4%. While these differences may seem small, and may not have any significant impact on the comparisons between Black and White candidates discussed below, they could have a larger impact on the BVAP analysis discussed later in this report.

Table 1: Comparison of Alford and Collingwood 2024 EI estimates for White Voters

| Office | Name | Party | Race | Statewide | | Demonstration Area | | SD 1 | | SD 2 | |
|---|----------------------|---------------------|-------|-----------------|-----------------|--------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| | | | | Collingwood | Alford | Collingwood | Alford | Collingwood | Alford | Collingwood | Alford |
| | | | | % White Support | % White Support | % White Support | % White Support | % White Support | % White Support | % White Support | % White Support |
| Lt. Gov. | Rachel Hunt | DEM | White | 29.1% | 33.8% | 12.7% | 16.4% | 19.9% | 25.8% | 19.2% | 23.5% |
| Lt. Gov. | Hal Weatherman | REP | White | 67.3% | 66.2% | 83.7% | 83.6% | 76.6% | 74.2% | 77.6% | 76.5% |
| A. G. | Jeff Jackson | DEM | White | 31.8% | 35.1% | 14.5% | 16.3% | 21.0% | 25.4% | 21.0% | 23.1% |
| A. G. | Dan Bishop | REP | White | 68.2% | 64.9% | 86.3% | 83.7% | 79.1% | 74.6% | 79.0% | 76.9% |
| Sec. of St. | Elaine Marshall | DEM | White | 31.0% | 34.2% | 17.3% | 19.3% | 22.3% | 26.5% | 22.4% | 25.0% |
| Sec. of St. | Chad Brown | REP | White | 69.0% | 65.8% | 82.6% | 80.7% | 77.7% | 73.5% | 77.5% | 75.0% |
| Treas. | Wesley Harris | DEM | White | 25.8% | 29.1% | 11.8% | 13.6% | 18.7% | 22.9% | 16.0% | 19.0% |
| Treas. | Brad Briner | REP | White | 74.1% | 70.9% | 88.9% | 86.4% | 81.3% | 77.1% | 84.0% | 81.0% |
| Agri. Comm | Sarah Taber | DEM | White | 23.1% | 27.5% | 7.4% | 10.9% | 17.1% | 22.3% | 13.3% | 17.3% |
| Agri. Comm | Steve Troxler | REP | White | 74.4% | 72.5% | 90.2% | 89.1% | 80.2% | 77.7% | 84.8% | 82.7% |
| Ins. Comm. | Natasha Marcus | DEM | White | 26.3% | 29.4% | 11.1% | 12.7% | 19.9% | 22.4% | 16.6% | 19.9% |
| Ins. Comm. | Mike Causey | REP | White | 73.7% | 70.6% | 88.3% | 87.3% | 80.2% | 77.6% | 83.3% | 80.1% |
| S. C. Seat 6 | Allison Riggs | DEM | White | 29.6% | 33.1% | 13.4% | 14.9% | 21.0% | 25.2% | 18.9% | 21.4% |
| S. C. Seat 6 | Jefferson G. Griffin | REP | White | 70.4% | 66.9% | 86.6% | 85.1% | 79.0% | 74.8% | 81.1% | 78.6% |
| Apps. Ct. 14 | Ed Eldred | DEM | White | 26.4% | 29.4% | 11.2% | 12.6% | 18.3% | 22.5% | 16.0% | 18.6% |
| Apps. Ct. 14 | Valerie Zachary | REP | White | 73.8% | 70.6% | 88.9% | 87.4% | 81.7% | 77.5% | 84.1% | 81.4% |
| Senate Dist 1 | Susan Harman-Scott | DEM | White | | | | | 19.2% | 23.1% | | |
| Senate Dist 1 | Bobby Hanig | REP | White | | | | | 80.8% | 76.9% | | |
| White Dem. vs White Rep. | | Dem. Average | | 27.9% | 31.5% | 12.4% | 14.6% | 19.7% | 24.0% | 17.9% | 21.0% |
| | | Rep. Average | | 71.3% | 68.5% | 86.9% | 85.4% | 79.5% | 75.9% | 81.4% | 79.0% |
| Pres. | Kamala D. Harris | DEM | Black | 27.0% | 32.0% | 10.7% | 12.9% | 19.8% | 24.7% | 16.0% | 20.9% |
| Pres. | Donald J. Trump | REP | White | 71.2% | 68.0% | 87.9% | 87.1% | 79.1% | 75.3% | 83.0% | 79.1% |
| Auditor | Jessica Holmes | DEM | Black | 26.0% | 31.6% | 11.3% | 14.2% | 18.7% | 24.8% | 16.8% | 20.1% |
| Auditor | Dave Boliek | REP | White | 69.8% | 68.4% | 86.1% | 85.8% | 77.6% | 75.2% | 81.6% | 79.9% |
| Labor Comm. | Braxton Winston II | DEM | Black | 25.5% | 28.7% | 10.9% | 12.4% | 18.6% | 22.8% | 15.5% | 18.3% |
| Labor Comm. | Luke Farley | REP | White | 74.5% | 71.3% | 89.7% | 87.6% | 81.4% | 77.2% | 84.5% | 81.7% |
| Apps. Ct. 12 | Carolyn Thompson | DEM | Black | 28.1% | 31.3% | 12.9% | 13.8% | 20.8% | 24.3% | 17.1% | 19.7% |
| Apps. Ct. 12 | Tom Murry | REP | White | 71.8% | 68.7% | 87.4% | 86.2% | 79.2% | 75.7% | 83.8% | 80.3% |
| Apps. Ct. 15 | Martin E. Moore | DEM | Black | 27.0% | 30.2% | 11.3% | 12.4% | 18.9% | 23.0% | 16.1% | 19.0% |
| Apps. Ct. 15 | Chris Freeman | REP | White | 72.9% | 69.8% | 88.8% | 87.6% | 81.0% | 77.0% | 83.9% | 81.0% |
| Super. Pub. Instr. | Maurice Green | DEM | Black | 31.4% | 34.4% | 16.2% | 18.4% | 21.6% | 25.4% | 22.2% | 25.0% |
| Super. Pub. Instr. | Michele Morrow | REP | White | 68.6% | 65.6% | 84.7% | 81.6% | 78.4% | 74.6% | 77.8% | 75.0% |
| Senate Dist 2 | Tare (T) Davis | DEM | Black | | | | | | | 15.7% | 20.7% |
| Senate Dist 2 | Norman Sanderson | REP | White | | | | | | | 81.5% | 79.3% |
| Black Dem. vs White Rep. | | Dem. Average | | 27.5% | 31.4% | 12.2% | 14.0% | 19.7% | 24.2% | 17.0% | 20.5% |
| | | Rep. Average | | 71.5% | 68.6% | 87.4% | 86.0% | 79.4% | 75.8% | 82.4% | 79.5% |
| White D./White D. vs. Black D./White D. difference | | | | 0.39% | 0.1% | 0.2% | 0.6% | 0.0% | -0.2% | 0.9% | 0.4% |
| Gov. | Josh Stein | DEM | White | 37.5% | 44.0% | 18.5% | 21.7% | 23.1% | 28.9% | 26.6% | 32.8% |
| Gov. | Mark Robinson | REP | Black | 55.7% | 56.0% | 77.9% | 78.3% | 72.6% | 71.1% | 67.4% | 67.2% |
| White Dem. Average (includes Stein/Robinson) | | | | 29.0% | 32.8% | 13.1% | 15.4% | 20.1% | 24.7% | 18.9% | 22.3% |
| Black/White Dem. difference | | | | 1.5% | 1.5% | 0.9% | 1.4% | 0.4% | 0.5% | 1.8% | 1.8% |

Table 2: Comparison of Alford and Collingwood 2024 EI estimates for Black Voters

| Office | Name | Party | Race | Statewide | | Demonstration Area | | SD 1 | | SD 2 | |
|---|----------------------|---------------------|-------|-----------------|-----------------|--------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| | | | | Collingwood | Alford | Collingwood | Alford | Collingwood | Alford | Collingwood | Alford |
| | | | | % Black Support | % Black Support | % Black Support | % Black Support | % Black Support | % Black Support | % Black Support | % Black Support |
| Lt. Gov. | Rachel Hunt | DEM | White | 98.6% | 97.5% | 98.9% | 98.3% | 99.1% | 96.5% | 98.7% | 96.6% |
| Lt. Gov. | Hal Weatherman | REP | White | 1.1% | 2.5% | 0.9% | 1.7% | 0.8% | 3.5% | 0.8% | 3.4% |
| A. G. | Jeff Jackson | DEM | White | 98.7% | 93.7% | 99.0% | 98.3% | 99.0% | 95.8% | 98.9% | 96.4% |
| A. G. | Dan Bishop | REP | White | 1.3% | 6.3% | 0.9% | 1.7% | 0.9% | 4.2% | 0.8% | 3.6% |
| Sec. of St. | Elaine Marshall | DEM | White | 99.1% | 95.4% | 98.9% | 97.8% | 99.3% | 94.7% | 98.8% | 96.6% |
| Sec. of St. | Chad Brown | REP | White | 1.2% | 4.6% | 1.0% | 2.2% | 1.1% | 5.3% | 1.2% | 3.4% |
| Treas. | Wesley Harris | DEM | White | 99.1% | 95.7% | 98.8% | 98.2% | 99.0% | 95.7% | 99.1% | 97.4% |
| Treas. | Brad Briner | REP | White | 1.0% | 4.3% | 0.9% | 1.8% | 0.7% | 4.3% | 0.8% | 2.6% |
| Agri. Comm | Sarah Taber | DEM | White | 97.7% | 97.0% | 99.0% | 98.2% | 98.5% | 95.0% | 98.8% | 96.4% |
| Agri. Comm | Steve Troxler | REP | White | 1.6% | 3.0% | 1.0% | 1.8% | 1.1% | 5.0% | 0.8% | 3.6% |
| Ins. Comm. | Natasha Marcus | DEM | White | 99.0% | 95.6% | 99.1% | 98.2% | 99.4% | 96.3% | 98.9% | 96.7% |
| Ins. Comm. | Mike Causey | REP | White | 1.0% | 4.4% | 0.9% | 1.8% | 0.7% | 3.7% | 1.0% | 3.3% |
| S. C. Seat 6 | Allison Riggs | DEM | White | 99.0% | 94.9% | 98.8% | 98.2% | 99.2% | 95.2% | 98.8% | 96.4% |
| S. C. Seat 6 | Jefferson G. Griffin | REP | White | 1.4% | 5.1% | 0.9% | 1.8% | 1.0% | 4.8% | 0.9% | 3.6% |
| Apps. Ct. 14 | Ed Eldred | DEM | White | 99.3% | 94.4% | 99.0% | 97.9% | 99.4% | 95.5% | 98.7% | 97.2% |
| Apps. Ct. 14 | Valerie Zachary | REP | White | 0.8% | 5.6% | 1.0% | 2.1% | 0.5% | 4.5% | 0.8% | 2.8% |
| Senate Dist 1 | Susan Harman-Scott | DEM | White | | | | | 99.3% | 95.7% | | |
| Senate Dist 1 | Bobby Hanig | REP | White | | | | | 0.8% | 4.3% | | |
| White Dem. vs White Rep. | | Dem. Average | | 98.8% | 95.5% | 98.9% | 98.1% | 99.1% | 95.6% | 98.8% | 96.7% |
| | | Rep. Average | | 1.2% | 4.5% | 0.9% | 1.9% | 0.8% | 4.4% | 0.9% | 3.3% |
| Pres. | Kamala D. Harris | DEM | Black | 98.5% | 94.0% | 99.0% | 97.1% | 99.1% | 92.2% | 99.2% | 96.7% |
| Pres. | Donald J. Trump | REP | White | 1.4% | 6.0% | 0.9% | 2.9% | 1.0% | 7.8% | 0.7% | 3.3% |
| Auditor | Jessica Holmes | DEM | Black | 98.9% | 97.5% | 99.0% | 98.2% | 99.4% | 96.4% | 98.9% | 97.2% |
| Auditor | Dave Boliek | REP | White | 0.9% | 2.5% | 1.0% | 1.8% | 1.2% | 3.6% | 0.7% | 2.8% |
| Labor Comm. | Braxton Winston II | DEM | Black | 99.1% | 95.0% | 98.9% | 98.2% | 99.1% | 95.4% | 99.3% | 96.3% |
| Labor Comm. | Luke Farley | REP | White | 1.0% | 5.0% | 0.9% | 1.8% | 0.5% | 4.6% | 1.0% | 3.7% |
| Apps. Ct. 12 | Carolyn Thompson | DEM | Black | 98.6% | 95.4% | 99.0% | 98.1% | 99.1% | 95.3% | 98.9% | 97.0% |
| Apps. Ct. 12 | Tom Murry | REP | White | 1.2% | 4.6% | 0.9% | 1.9% | 1.0% | 4.7% | 0.6% | 3.0% |
| Apps. Ct. 15 | Martin E. Moore | DEM | Black | 98.8% | 95.5% | 98.9% | 98.0% | 99.1% | 95.7% | 99.0% | 96.4% |
| Apps. Ct. 15 | Chris Freeman | REP | White | 1.1% | 4.5% | 0.9% | 2.0% | 0.8% | 4.3% | 0.6% | 3.6% |
| Super. Pub. Instr. | Maurice Green | DEM | Black | 99.3% | 95.4% | 99.0% | 98.1% | 99.1% | 95.5% | 98.9% | 96.4% |
| Super. Pub. Instr. | Michele Morrow | REP | White | 1.2% | 4.6% | 0.5% | 1.9% | 0.8% | 4.5% | 1.0% | 3.6% |
| Senate Dist 2 | Tare (T) Davis | DEM | Black | | | | | | | 99.2% | 97.4% |
| Senate Dist 2 | Norman Sanderson | REP | White | | | | | | | 1.3% | 2.6% |
| Black Dem. vs White Rep. | | Dem. Average | | 98.9% | 95.5% | 99.0% | 97.9% | 99.1% | 95.1% | 99.0% | 96.8% |
| | | Rep. Average | | 1.1% | 4.5% | 0.8% | 2.1% | 0.9% | 4.9% | 0.8% | 3.3% |
| White D./White D. vs. Black D./White D. difference | | | | -0.1% | 0.1% | 0.0% | 0.2% | 0.0% | 0.5% | -0.2% | -0.1% |
| Gov. | Josh Stein | DEM | White | 98.1% | 96.4% | 98.7% | 98.1% | 96.7% | 95.0% | 98.4% | 94.9% |
| Gov. | Mark Robinson | REP | Black | 1.2% | 3.6% | 1.1% | 1.9% | 2.1% | 5.0% | 1.5% | 5.1% |
| White Dem. Average (includes Stein/Robinson) | | | | 98.7% | 95.6% | 98.9% | 98.1% | 98.8% | 95.5% | 98.8% | 96.5% |
| Black/White Dem. difference | | | | -0.1% | 0.2% | -0.1% | 0.2% | -0.3% | 0.4% | -0.3% | -0.3% |

In his Supplemental Report, Dr. Collingwood suggests that there is a slight difference in White voter support for Black versus White Democratic candidates across the 2024 elections. Specifically, he reports:

On average, White voters are slightly less supportive of Black Democratic candidates than they are of White Democratic candidates in the 2024 elections. Statewide, the difference is about 1.5 percentage points (27.5% vs. 29%); in District

1 the difference is less than a percentage point (19.72% vs. 20.05%); in District 2 the difference is 1.84 percentage points (17.05% vs. 18.89%); and in the Demonstration Area the average difference is less than a percentage point (12.22% vs. 13.08%).

Supp. Rep. at 1. These differences are very small compared to the 70 to 80 percent gap in Black versus White support for Democratic candidates.

Even these small gaps are largely the result of the unusual 2024 Gubernatorial contest discussed in more detail below. Dr. Collingwood averages that contest with the eight White versus White candidate contests. As Table 1 above shows, in the eight White versus White contests the average White vote for the White Democrat in Dr. Collingwood's statewide EI results is 27.9%, reducing the difference from the 1.5 percentage points he reports to .4 percentage points. Similarly, for SD1 his EI results for the White versus White contest average 19.7%, reducing the gap to zero. For SD2 his EI result for the White versus White contest average 17.9%, reducing the gap to .9 percentage points. Similarly, for his Demonstration area his EI results for the White versus White contest average is 12.4%, reducing the gap to .2 percentage points. All of these very small gaps are comparable to the equally small gaps that result from using my EI results, and all are in the range of the credible intervals, which makes it difficult to be sure if the gaps are even real. Regardless of how these differences are calculated, and regardless of whose results are used, the differences in 2024, like those in the previous election cycles, indicate that to the extent that elections in these geographies are polarized, they are polarized by the 70-to-80 percent gap in Black versus White voter support for Democratic candidates, not by the occasional gap in the range of one percentage point that might be associated with the race of the candidate.

Table 3 below summarizes the impact of candidate party versus candidate race on the voting of Black and White voters in the 2024 elections. The impact of the party of the candidate on voters is clear and polarizing. The gap between Black voter support for the Democratic

candidate and White voter support for the Democratic candidate is about 70 to 80 percentage points in all these geographies. In contrast, the impact of the race of the candidate is near zero. To the extent that elections in North Carolina are polarized it is party polarization. The near zero impact of the race of the candidates can hardly be termed polarization.

Table 3: Impact of Candidate Party versus Candidate Race in the 2024 Elections

| | | Statewide | | Demonstration Area | | SD 1 | | SD 2 | |
|---|--------------|--------------|--------------|--------------------|--------------|--------------|--------------|--------------|--------------|
| Democratic Candidate Percent | | Collingwood | Alford | Collingwood | Alford | Collingwood | Alford | Collingwood | Alford |
| Black Voters | | 98.8% | 95.5% | 98.9% | 98.1% | 99.1% | 95.4% | 98.9% | 96.7% |
| White Voters | | 27.7% | 31.4% | 12.3% | 14.4% | 19.7% | 24.1% | 17.6% | 20.8% |
| Impact of Candidate Party | | 71.1% | 64.1% | 86.6% | 83.7% | 79.4% | 71.2% | 81.3% | 75.9% |
| White Dem. vs White Rep. | | | | | | | | | |
| White Voters | Dem. Average | 27.9% | 31.5% | 12.4% | 14.6% | 19.8% | 24.1% | 17.9% | 21.0% |
| Black Voters | Dem. Average | 98.8% | 95.5% | 98.9% | 98.1% | 99.1% | 95.6% | 98.8% | 96.7% |
| White vs. White Candidate Polarization | | 70.9% | 64.1% | 86.5% | 83.5% | 79.3% | 71.5% | 80.9% | 75.8% |
| Black Dem. vs White Rep. | | | | | | | | | |
| White Voters | Dem. Average | 27.5% | 31.4% | 12.2% | 14.0% | 19.7% | 24.2% | 17.3% | 20.5% |
| Black Voters | Dem. Average | 98.9% | 95.5% | 99.0% | 97.9% | 99.1% | 95.1% | 99.0% | 96.7% |
| Black vs. White Candidate Polarization | | 71.4% | 64.1% | 86.7% | 83.9% | 79.4% | 70.9% | 81.7% | 76.2% |
| Impact of a Black Democratic Candidate | | 0.5% | 0.0% | 0.2% | 0.4% | 0.1% | -0.5% | 0.8% | 0.4% |

Table 4: Impact of Candidate Party versus Candidate Race in the 2024 Elections with Stein/Robinson included with White Democrat Contests

| | | Statewide | | Demonstration Area | | SD 1 | | SD 2 | |
|---|--------------|--------------|--------------|--------------------|--------------|--------------|--------------|--------------|--------------|
| Democratic Candidate Percent | | Collingwood | Alford | Collingwood | Alford | Collingwood | Alford | Collingwood | Alford |
| Black Voters | | 98.8% | 95.5% | 98.9% | 98.1% | 99.1% | 95.4% | 98.9% | 96.7% |
| White Voters | | 27.7% | 31.4% | 12.3% | 14.4% | 19.7% | 24.1% | 17.6% | 20.8% |
| Impact of Candidate Party | | 71.1% | 64.1% | 86.6% | 83.7% | 79.4% | 71.2% | 81.3% | 75.9% |
| White Dem. | | | | | | | | | |
| White Voters | Dem. Average | 29.0% | 32.8% | 13.1% | 15.4% | 20.1% | 24.7% | 18.9% | 22.3% |
| Black Voters | Dem. Average | 98.8% | 95.5% | 98.9% | 98.1% | 99.1% | 95.6% | 98.8% | 96.7% |
| White vs. White Candidate Polarization | | 69.9% | 62.7% | 85.9% | 82.8% | 79.0% | 70.9% | 79.9% | 74.4% |
| Black Dem. vs White Rep. | | | | | | | | | |
| White Voters | Dem. Average | 27.5% | 31.4% | 12.2% | 14.0% | 19.7% | 24.2% | 17.3% | 20.5% |
| Black Voters | Dem. Average | 98.9% | 95.5% | 99.0% | 97.9% | 99.1% | 95.1% | 99.0% | 96.7% |
| Black vs. White Candidate Polarization | | 71.4% | 64.1% | 86.7% | 83.9% | 79.4% | 70.9% | 81.7% | 76.2% |
| Impact of a Black Democratic Candidate | | 1.5% | 1.4% | 0.9% | 1.2% | 0.4% | 0.0% | 1.8% | 1.8% |

B. The 2024 Gubernatorial Contest

On page 5 of his Supplemental Report, Dr. Collingwood rejects the value of any consideration of the race of a candidate, repeating much of the same justification for not even mentioning the race or party affiliation of any of the candidates in his original report:

As I noted in my August report, racially polarized voting analysis focuses on the voter's race and their vote choice, to determine whether voting is polarized based on the race of the voter. As I explained, a White candidate may be the preferred candidate of Black voters for reasons related to the voters' race, including because the White candidate takes policy stances that are in line with the policies and issues Black voters care about. For that reason, as I noted in my August report, the type of analysis that Dr. Alford engages in, in which he compares White and Black voters' support for Black and White Democratic candidates, cannot support any conclusion that partisanship rather than race drives racially polarized voting in the areas at issue here.

While continuing to maintain that the race of the candidates is irrelevant to an RPV analysis, Dr. Collingwood provides an analysis for 2024 that mirrors my analysis of the impact of candidate party and race, but says he is only doing so because “I anticipate that Dr. Alford will analyze the race and party of the candidate and so I have conducted that sort of comparison as well to show the results under Dr. Alford’s type of analysis” (page 5). In that analysis, as reported and discussed above, Dr. Collingwood finds only minimal differences, and even as slight as those differences are they depend largely on his inclusion of the Governor contest. What is most apparent is that Dr. Collingwood is now willing to talk about the race of the candidates because he interprets the results of the 2024 Governor contest in a way that he opines highlights the role of the race of the candidate.

Initially, it is important to note that Dr. Collingwood’s focus on the 2024 Governor’s contest—more than half his discussion of polarization in 2024 is devoted to that single contest—marks a departure from his earlier cautions not to draw conclusions from a single contest. In his rebuttal report in this case dated August 30, 2024, Dr. Collingwood cautioned against relying on a

finding based on only one or two Black candidates. He states on page 3 that focusing on 2018 “Dr. Alford reports that White voter support was equally cohesive, although the data for comparison in that cycle is very limited, as there were only 4 statewide races, and only one involved a Black candidate. The 2018 election cycle accordingly is not a good source for analyzing differences in support between minority Democratic candidates and white Democratic candidates.” On page 4 in the same section of that report he also notes that “[a]n analysis based on support for one or two Black candidates is not reliable, especially when these contests are happening in different years.” Referencing my discussion of the single 2016 non-partisan contest, Dr. Collingwood also rejects drawing any inference from a single unusual contest by claiming on page 5 “[t]hus, Dr. Alford selects a clear outlier contest to contend that voting is less polarized in non-partisan contests. But the fact remains that of the 49 contests analyzed we do see stark minority cohesion and consistent RPV between white and Black voters across all the analyzed jurisdictions.” This is a reasonable caution, and in fact my ultimate conclusion relies on comparing the 17 contests from 2016 to 2024 where a Black Democrat has faced a White Republican to the 43 contests where a White Democrat faced a White Republican.

But consider the extent of Dr. Collingwood’s reliance on a single contest in his Supplemental Report. Dr. Collingwood’s newfound interest in the race of the candidate relies entirely on the singular instance of the 2024 Governor contest. Below in Figure 1 is Dr. Collingwood’s Table 3.2 where he offers a contrast between contests in which the GOP candidate is Black and contests in which the GOP candidate is White. The “White GOP” column is the mean vote share across 13 statewide contests. The “Black GOP” column is just the vote share for Robinson, the Black Republican in the Governor contest.

Figure 1: Collingwood Table

Table 3.2: Comparison across different election types. Support for Republican candidates by voter race overall vs. when Republican candidate is White or Black, Statewide.

| Voter Race | Overall | White GOP | Black GOP | Delta |
|------------|---------|-----------|-----------|--------|
| Black | 1.16 | 1.16 | 1.17 | 0.01 |
| White | 70.35 | 71.40 | 55.66 | -15.74 |

Despite the extensive volume of the discussion of the Governor contest in Dr. Collingwood's Supplemental Report, his focus is solely on the importance of the race of the candidates in this election, again a topic he has previously been entirely silent on. Dr. Collingwood notes that Robinson performed worse among White voters in 2024 than he did in 2020, and attributes this to the fact that Robinson had a Black Democratic opponent in 2020 and a White Democratic opponent in 2024. Dr. Collingwood doesn't mention it, but none of this appears to have had any impact on Black voters at all. Of course, it is also true that Republicans nominated Robinson, with 65% of the vote, over two White Republican candidates in 2024 despite his being Black and Republican voters in North Carolina being overwhelmingly White. Similarly, Stein received 70% of the vote in the Democratic primary over four Black candidates, despite his being White and a large share of Democratic voters being Black.

One notable omission from Dr. Collingwood's extensive discussion of this single election is any acknowledgment that events during the 2024 campaign, in contrast to his 2020 campaign, might have given voters reasons to cross over and support Josh Stein beyond the fact that Stein was a White candidate.

The Carolina Public Press summed up the contest on November 5, 2024, by noting:

Stein's campaign was effective throughout 2024 in painting Robinson as extreme and corrupt, while Robinson's team struggled to land any effective punches against the Democrat. Scandals, including an ongoing investigation into Robinson's past

*campaign finances, did not prevent him from beating outgoing State Treasurer Dale Folwell in the GOP primary in March. But Robinson failed to gain traction with general election voters. Additional concerns about his past campaign activities came to light when CPP reported in August on claims that he had never spent any money with a kayak shop that appeared on his campaign reports. Then **the bottom fell out in late September** as reporting by The Assembly and national news organizations unveiled a past pattern of Robinson patronizing adult sites and making both lewd and extremist comments, including claiming in post that he was a “Black Nazi.” Robinson denied that the posts were his despite clear evidence that they came from his accounts, years before he was a political figure. Even as some Republicans said he should get the benefit of the doubt, others distanced themselves from the lieutenant governor’s disintegrating political career. Although Trump did not address Robinson’s problems directly, the lieutenant governor was no longer welcome at Trump’s many North Carolina events.¹*

This version of events squares with polling in the Governor’s contest by the East Carolina University Center for Survey Research. Their poll at the beginning of December 2023 had Robinson up narrowly over Stein by 4 points.² By mid-February 2024, the race was a tossup with Robinson up by only 1 point.³ By early June 2024, the contest remained a tossup with Stein now up by a single point.⁴ Things had started to tilt toward Stein by the end of August 2024, with Stein up by 6 points over Robinson.⁵ In the next ECU poll in late September 2024, the race had shifted dramatically, with Stein now up by 17 points.⁶ In reflecting on the dramatic shift away from Robinson, the Director of the ECU Center for Survey Research indicated: “The recent scandals

¹ *Stein is NC’s next governor. Trump wins victory in NC, appears headed back to White House*, CAROLINA PUBLIC PRESS, Nov. 5, 2024 (available at <https://carolinapublicpress.org/66977/stein-is-ncs-next-governor-presidential-contest-remains-close/>) (accessed Mar. 7, 2025) (emphasis added).

² Survey results available at: https://surveyresearch-ecu.reportablenews.com/pr/mark-robinson-ahead-in-nc-republican-primary-for-governor-but-many-undecided-trump-with-wide-lead-over-republican-rivals-robinson-stein-matchup-competitive?_gl=1*1454b8h*_gcl_au*MTMzMTC2MTAyNC4xNzAxODIwMDMz.

³ Survey results available at: https://surveyresearch-ecu.reportablenews.com/pr/mark-robinson-and-josh-stein-clear-favorites-to-win-nominations-in-primary-elections-for-governor-likely-general-election-matchup-tied?_gl=1*smfsak*_gcl_au*MTMzMTC2MTAyNC4xNzAxODIwMDMz.

⁴ Survey results available at: <https://surveyresearch-ecu.reportablenews.com/pr/trump-leads-biden-by-5-points-in-north-carolina-gubernatorial-election-remains-close-with-stein-up-1-on-robinson-trump-guilty-verdict-has-little-impact-on-nc-voter-intentions-for-november>.

⁵ Survey results available at: <https://surveyresearch-ecu.reportablenews.com/pr/north-carolina-election-heats-up-trump-leads-harris-by-1-point-in-north-carolina-stein-widens-advantage-over-robinson-in-race-for-governor>.

⁶ Survey results available at: <https://surveyresearch-ecu.reportablenews.com/pr/trump-lead-harris-by-two-in-north-carolina-josh-stein-opens-large-lead-over-mark-robinson-in-race-for-nc-governor>.

surrounding Mark Robinson have had a major impact. What was once a competitive race in the election for governor of North Carolina no longer is. As of now, Josh Stein is the clear and overwhelming favorite to be the next governor of North Carolina.”⁷ Stein held his strong lead into the final ECU poll in late October 2024 with Robinson trailing by 15 points.⁸

North Carolina voters were certainly aware of damaging revelations regarding Robinson. The implosion of Robinson’s campaign was not an obscure “insider politics” event. It was a highly visible news story covered and commented on extensively even in the national media. Unlike the 2016 contest that Dr. Collingwood criticized my original report for analyzing, the 2024 Governor contest with its highly publicized downturn in Robinson’s campaign, was a special circumstance that makes this election less useful when evaluating voting patterns in North Carolina politics.

Finally, the fact that Robinson was Black and Stein was White were also likely known by North Carolina voters long before August 2024. Robinson had already served a full term as Lt. Governor, and Stein have served in the State Senate and most recently served two terms in the statewide office of Attorney General.

C. BVAP Analysis

In his Supplemental Report, Dr. Collingwood updates his estimation of the BVAP needed to win analysis by adding the 2024 statewide elections. He reports on page 20 that the mean BVAP percentage is 47.7% across these elections. I have estimated the BVAP needed to win based on the 2024 elections, but I follow the procedure utilized by Dr. Lisa Handley in both a published article on the topic⁹ and in a report to the court in 2019. Dr. Handley’s approach is similar in concept to

⁷ *Id.*

⁸ Survey results available at: <https://surveyresearch-ecu.reportablenews.com/pr/trump-up-2-points-over-harris-in-north-carolina-as-election-day-nears-josh-stein-maintains-comfortable-lead-over-mark-robinson-in-race-for-nc-governor>.

⁹ Bernard Grofman, Lisa Handley, David Lublin, *Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence*, 79 N.C. L. Rev. 1383 (2001).

Dr. Collingwood's approach, as both depend on three essential estimates: the Black share of turnout, the estimated Black support for the Black preferred candidate, and the estimated White crossover support for the Black preferred candidate. One key difference, however, is that while Dr. Handley labels her columns 'Black' and 'White', she is actually estimating and reporting support of "Black" and "non-Black" voters. As she explains, "In this report, I discuss black and white voting behavior but in reality the analysis considers black and non-black voting behavior."¹⁰ The reason this matters is that the crossover proportion among White voters might well be different from the level of crossover support among voters that are neither Black nor White. We can see this difference in 2024 by estimating Black versus "non-Black" voting behavior, rather than the Black versus White voting behavior reported in the polarized voting analysis reported above and in Dr. Collingwood's reports in this case. Table 5 below provides the Black/non-Black EI analysis in the same form as Tables 1 and 2 above which report the Black/White analysis, except for the fact that Table 5 does not include comparable estimates from Dr. Collingwood as those are not available.

The comparison of voting behavior based on the party and race of the candidates are not meaningfully different in Table 5 compared with the previous discussion based on the differences in Table 1 and Table 2. In other words, the distinction between estimates based on Black versus White voters, in contrast to Black versus "non-Black" voters, is not important for the task of assessing the impact of candidate party versus race, and for in order to keep things compatible across experts the earlier RPV analysis followed Dr. Collingwood's choice of Black versus White. However, what is clear is that the estimates for crossover voting for non-Black voters are

¹⁰ Page 7 of her report titled "Providing Black Voters with an Opportunity to Elect Candidates of Choice to the North Carolina State Legislature: A Jurisdiction-Specific, Functional Analysis of Select House and Senate County Grouping" dated September 17, 2019.

systematically higher than the estimates of crossover voting focusing on Whites alone. Since the level majority crossover is important in a BVAP to win analysis, this does matter here.

Table 5: 2024 EI estimates for Black versus non-Black Voters

| | | | | Statewide | | Demonstration Area | | SD 1 | | SD 2 | |
|---|----------------------|---------------------|-------|--------------|--------------|--------------------|--------------|--------------|--------------|--------------|--------------|
| | | | | % Black | % non-Black | % Black | % non-Black | % Black | % non-Black | % Black | % non-Black |
| Office | Name | Party | Race | Support | Support | Support | Support | Support | Support | Support | Support |
| Lt. Gov. | Rachel Hunt | DEM | White | 98.8% | 40.8% | 98.2% | 24.0% | 96.8% | 28.2% | 97.1% | 27.8% |
| Lt. Gov. | Hal Weatherman | REP | White | 1.2% | 59.2% | 1.8% | 76.0% | 3.2% | 71.8% | 2.9% | 72.2% |
| A. G. | Jeff Jackson | DEM | White | 98.2% | 41.1% | 98.4% | 24.7% | 96.8% | 28.2% | 96.9% | 28.7% |
| A. G. | Dan Bishop | REP | White | 1.8% | 58.9% | 1.6% | 75.3% | 3.2% | 71.8% | 3.1% | 71.3% |
| Sec. of St. | Elaine Marshall | DEM | White | 98.6% | 40.7% | 98.1% | 27.3% | 96.6% | 29.4% | 96.8% | 30.1% |
| Sec. of St. | Chad Brown | REP | White | 1.4% | 59.3% | 1.9% | 72.7% | 3.4% | 70.6% | 3.2% | 69.9% |
| Treas. | Wesley Harris | DEM | White | 98.6% | 36.4% | 98.1% | 21.8% | 96.9% | 26.1% | 97.5% | 24.0% |
| Treas. | Brad Briner | REP | White | 1.4% | 63.6% | 1.9% | 78.2% | 3.1% | 73.9% | 2.5% | 76.0% |
| Agri. Comm | Sarah Taber | DEM | White | 98.6% | 34.9% | 98.4% | 18.0% | 96.5% | 24.5% | 96.7% | 21.8% |
| Agri. Comm | Steve Troxler | REP | White | 1.4% | 65.1% | 1.6% | 82.0% | 3.5% | 75.5% | 3.3% | 78.2% |
| Ins. Comm. | Natasha Marcus | DEM | White | 98.6% | 36.8% | 98.5% | 20.2% | 96.9% | 25.9% | 96.6% | 24.4% |
| Ins. Comm. | Mike Causey | REP | White | 1.4% | 63.2% | 1.5% | 79.8% | 3.1% | 74.1% | 3.4% | 75.6% |
| S. C. Seat 6 | Allison Riggs | DEM | White | 98.5% | 39.5% | 98.2% | 23.2% | 96.2% | 28.1% | 97.1% | 26.6% |
| S. C. Seat 6 | Jefferson G. Griffin | REP | White | 1.5% | 60.5% | 1.8% | 76.8% | 3.8% | 71.9% | 2.9% | 73.4% |
| Apps. Ct. 14 | Ed Eldred | DEM | White | 98.3% | 36.7% | 98.3% | 20.9% | 96.5% | 25.6% | 97.0% | 24.3% |
| Apps. Ct. 14 | Valerie Zachary | REP | White | 1.7% | 63.3% | 1.7% | 79.1% | 3.5% | 74.4% | 3.0% | 75.7% |
| White Dem. vs White Rep. | | Dem. Average | | 98.5% | 38.4% | 98.3% | 22.5% | 96.7% | 27.0% | 97.0% | 26.0% |
| White Dem. vs White Rep. | | Rep. Average | | 1.5% | 61.6% | 1.7% | 77.5% | 3.3% | 73.0% | 3.0% | 74.0% |
| | | | | | | | | | | | |
| Pres. | Kamala D. Harris | DEM | Black | 96.4% | 38.6% | 97.6% | 21.0% | 94.9% | 26.6% | 96.9% | 24.7% |
| Pres. | Donald J. Trump | REP | White | 3.6% | 61.4% | 2.4% | 79.0% | 5.1% | 73.4% | 3.1% | 75.3% |
| Auditor | Jessica Holmes | DEM | Black | 98.8% | 38.2% | 98.5% | 22.1% | 97.5% | 26.8% | 97.0% | 25.4% |
| Auditor | Dave Boliek | REP | White | 1.2% | 61.8% | 1.5% | 77.9% | 2.5% | 73.2% | 3.0% | 74.6% |
| Labor Comm. | Braxton Winston II | DEM | Black | 98.4% | 36.1% | 98.5% | 20.4% | 96.5% | 25.5% | 97.0% | 23.6% |
| Labor Comm. | Luke Farley | REP | White | 1.6% | 63.9% | 1.5% | 79.6% | 3.5% | 74.5% | 3.0% | 76.4% |
| Apps. Ct. 12 | Carolyn Thompson | DEM | Black | 98.3% | 38.4% | 98.5% | 22.4% | 96.6% | 27.3% | 96.7% | 25.4% |
| Apps. Ct. 12 | Tom Murry | REP | White | 1.7% | 61.6% | 1.5% | 77.6% | 3.4% | 72.7% | 3.3% | 74.6% |
| Apps. Ct. 15 | Martin E. Moore | DEM | Black | 98.5% | 37.4% | 98.3% | 20.8% | 96.7% | 25.9% | 96.9% | 24.3% |
| Apps. Ct. 15 | Chris Freeman | REP | White | 1.5% | 62.6% | 1.7% | 79.2% | 3.3% | 74.1% | 3.1% | 75.7% |
| Super. Pub. Instr. | Maurice Green | DEM | Black | 98.6% | 40.8% | 98.2% | 25.2% | 96.7% | 28.6% | 96.5% | 29.2% |
| Super. Pub. Instr. | Michele Morrow | REP | White | 1.4% | 59.2% | 1.8% | 74.8% | 3.3% | 71.4% | 3.5% | 70.8% |
| Black Dem. vs White Rep. | | Dem. Average | | 98.2% | 38.3% | 98.3% | 22.0% | 96.5% | 26.8% | 96.8% | 25.4% |
| | | Rep. Average | | 1.8% | 61.7% | 1.7% | 78.0% | 3.5% | 73.2% | 3.2% | 74.6% |
| Black/White Dem. Candidate difference | | | | 0.4% | 0.1% | 0.0% | 0.5% | 0.2% | 0.2% | 0.1% | 0.5% |
| | | | | | | | | | | | |
| Gov. | Josh Stein | DEM | White | 98.8% | 48.7% | 98.3% | 28.1% | 95.8% | 30.8% | 96.2% | 35.4% |
| Gov. | Mark Robinson | REP | Black | 1.2% | 51.3% | 1.7% | 71.9% | 4.2% | 69.2% | 3.8% | 64.6% |
| White Dem. Average (includes Stein/Robinson) | | | | 98.6% | 39.5% | 98.3% | 23.1% | 96.6% | 27.4% | 96.9% | 27.0% |
| Black/White Dem. Candidate difference | | | | 0.0% | 1.2% | 0.0% | 0.6% | -0.1% | 0.4% | -0.1% | 1.1% |

Table 6 below provides estimates of the BVAP needed to provide an equal opportunity for Black voters to elect their preferred candidate (the Democrat) for various geographies in the region of North Carolina that this case is focused on. The methodology used to produce the table follows Dr. Handley's methodology with the exception that she estimated turnout using EI, and Table 5 reports estimates that use the more accurate actual racial turnout (as does all the RPV analysis and BVAP analysis in this case both here and in Dr. Collingwood's reports).

Dr. Collingwood's reported estimate of 47.7% BVAP need in the 12-County Demonstration area to provide an equal opportunity district is clearly higher than the comparable estimate of 42% for the 12-County Demonstration in Table 5 below. This reflects the impact of the higher crossover contribution of non-Black voters (roughly 23%) compared to the estimated crossover contribution for White voters alone (roughly 15%). Across this area of the state, the BVAP needed to win for Black preferred candidates (Democrats) is in the low 40% range, well below the high 40% range that Dr. Collingwood reports for his Black versus White analysis.

Table 6: BVAP Needed to Win Based on Black versus non-Black EI estimates of Cohesion and Crossover.

| Office | BVAP % Needed for Democrat to win 50%+1 | | | | |
|--------------------|---|------------|------------|------------------------|-------------------|
| | Statewide | SD1 | SD2 | 12-County Demo Area | Edgecombe Pitt |
| A. G. | 19% | 40% | 39% | 40% | 27% |
| Auditor | 24% | 41% | 42% | 42% | 31% |
| Agri. Comm | 29% | 44% | 46% | 46% | 36% |
| Ins. Comm. | 26% | 42% | 44% | 44% | 33% |
| Labor Comm. | 27% | 43% | 44% | 44% | 34% |
| Apps. Ct. 12 | 24% | 41% | 43% | 42% | 32% |
| Apps. Ct. 14 | 26% | 43% | 44% | 43% | 34% |
| Apps. Ct. 15 | 25% | 42% | 44% | 43% | 34% |
| Gov. | 4% | 37% | 31% | 36% | 15% |
| Lt. Gov. | 20% | 40% | 40% | 40% | 28% |
| Sec. of St. | 20% | 39% | 37% | 37% | 25% |
| Super. Pub. Instr. | 20% | 39% | 39% | 39% | 26% |
| S. C. Seat 6 | 22% | 40% | 41% | 41% | 30% |
| Treas. | 26% | 42% | 44% | 43% | 33% |
| Pres. | 24% | 42% | 43% | 43% | 33% |
| Average | 22% | 41% | 41% | 42% | 30% |

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