IN THE SUPREME COURT OF OHIO

LEAGUE OF WOMEN VOTERS OF OHIO, *et al.*, *Relators*, *v.* OHIO REDISTRICTING COMMISSION, *et al.*, *Respondents*.	Case No. 2021-1193
BRIA BENNETT, *et al.*, *Relators*, *v.* OHIO REDISTRICTING COMMISSION, *et al.*, *Respondents*.	Case No. 2021-1198
THE OHIO ORGANIZING COLLABORATIVE, *et al.*, *Relators*, *v.* OHIO REDISTRICTING COMMISSION, *et al.*, *Respondents*.	Case No. 2021-1210

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PRESENTATION OF EVIDENCE BY RESPONDENTS HUFFMAN AND CUPP

VOLUME III

Respondents, Speaker of the Ohio House of Representatives Robert Cupp, and Senate President Matthew Huffman submit the following evidence in this matter[1]:

Exhibit	Item Description	Page no.
1	Senate President Huffman's Responses to Bennett Relators' Discovery Requests	HC_0001-HC_0013
2	Senate President Huffman's Responses to Ohio Organizing Collaborative Relators' Interrogatories	HC_0014-HC_0024
3	Senate President Huffman's Responses to League of Women Voters of Ohio Relators' Discovery Requests	HC_0025-HC_0045
4	Speaker Cupp's Responses to Bennett Relators' Discovery Requests	HC_0046-HC_0058
5	Speaker Cupp's Responses to Ohio Organizing Collaborative Relators' Interrogatories	HC_0059-HC_0068
6	Speaker Cupp's Responses to League of Women Voters of Ohio Relators' Discovery Requests	HC_0069-HC_0088
7	Ohio Redistricting Commission's Combined Responses to Interrogatories and Document Requests	HC_0089-HC_0111
8	Auditor Faber's Responses to Bennett Relators' Discovery Requests	HC_0112-HC_0129
9	Auditor Faber's Responses to Ohio Organizing Collaborative Relators' Interrogatories	HC_0130-HC_0142
10	Auditor Faber's Responses to League of Women Voters of Ohio Relators' Discovery Requests	HC_0143-HC_0187
11	Governor DeWine's Responses to Bennett Relators' Discovery Requests	HC_0188-HC_0208
12	Governor DeWine's Responses to Ohio Organizing Collaborative Relators' Interrogatories	HC_0209-HC_0223
13	Governor DeWine's Responses to League of Women Voters of Ohio Relators' Discovery Requests	HC_0224-HC_0266
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14	Secretary of State LaRose's Responses to Bennett Relators' Discovery Requests	HC_0267-HC_0285
15	Secretary of State LaRose's Responses to Ohio Organizing Collaborative Relators' Interrogatories	HC_0286-HC_0297

[1] Respondents Huffman and Cupp also reserve the right to rely on any evidence presented in this matter by stipulation or presented by any other party.

16	Secretary of State LaRose's Responses to League of Women Voters of Ohio Relators' Discovery Requests	HC_0298-HC_0340
17	Senator Sykes' Responses to Respondents Huffman and Cupp's Discovery Requests	HC_0341-HC_0360
18	Senator Sykes' Responses to Ohio Organizing Collaborative Relators' Interrogatory Responses	HC_0361-HC_0372
19	Senator Sykes' Responses to League of Women Voters of Ohio Relators' Discovery Requests	HC_0373-HC_0392
20	Leader Sykes' Responses to Respondents Huffman and Cupp's Discovery Requests	HC_0393-HC_0413
21	Leader Sykes' Responses to Ohio Organizing Collaborative Relators' Interrogatory Responses	HC_0414-HC_0424
22	Leader Sykes' Responses to League of Women Voters of Ohio Relators' Discovery Requests	HC_0425-HC_0446
23	ESYKES_0000237-ESYKES 0000247, Email Dated July 21, 2021 from Alex Aryeh, Subject "Final Agenda Joint Caucus Redistricting Retreat.pdf"	HC_0427-HC_0458
24	ESYKES_0000385-ESYKES0000386, Email Dated June 9, 2021 from Samantha Herd, Subject "FW: Draft Sykes/Yuko Letter Governor"	HC_0459-HC_0461
25	ESYKES_0007076-ESYKES0007082, Email Dated September 10, 2021 from Emiliana Morales, Subject "OLBC Redistricting Meeting follow up" and attachment	HC_0462-HC_0469
26	ESYKES_0009394-ESYKES0009397, Email Dated January 19, 2021 from Samantha Herd, Subject "Fwd: Memo for Legislator Roundtable Event w AG Holder" and attachment	HC_0470-HC_0474
27	ESYKES_0007247-ESYKES0007250, Email Dated August 20, 2021 from Samantha Herd, Subject "RE: Invoice and Purchase Letter: Consulting" and attachment	HC_0475-HC_0479
28	ESYKES_0000655-ESYKES_0000685, Email Dated January 22, 2020 from Katy Shanahan, subject "Final Review of Redistricting Guide" and attachment	HC_0480-HC_0511
29	Glassburn000024-Glassburn000031, Signed Contract with Project Govern	HC_0512-HC_0520
30	VYSKES_0013942-VSYKES_0013943, Email Dated August 12, 2021 from George Boas, Subject "Supplemental Allocation of Funds-8.11.2021" and attachment	HC_0521-HC_0523
31	VSYKES_0001113-VSYKES_0001114, Email Dated September 3, 2019 from Keary McCarthy, Subject "Re: Convening Ohio's Redistricting Experts"	HC_0524-HC_0526
32	VSYKES_0004365-VSYKES_0004367, Email From George Boas, October 13, 2021, Subject "George-23"	HC_0527-HC_0530
33	VSYKES_0008968-VSYKES_8970, Email Dated October 13, 2021 from Mike Rowe, Subject "Fwd: Background info for Monday Morning's conference call" and attachment	HC_0531-HC_0534

34	VSYKES_11348, Text Messages between Senator Sykes and Senate President Huffman	HC_0535-HC_0536
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35	Affidavit and Expert Report of Dr. Michael Barber	HC_0537-HC_0625
37	Affidavit and Expert Report of Dr. M.V. Hood III	HC_0626-HC_0653
Volume IV		
36	Affidavit and Expert Report of Sean Trende	
38	Affidavit of Raymond DiRossi	

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I hereby certify that on this 22nd day of October, 2021, I have served the foregoing document by email:

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4871-5290-1888 v.1

Exhibit 35

IN THE SUPREME COURT OF OHIO

League of Women Voters of Ohio, *et al.*, *Relators*, v. Ohio Redistricting Commission, *et al.*, *Respondents.*	Case No. 2021-1193

AFFIDAVIT OF MICHAEL BARBER

Now comes affiant Michael Barber, having been first duly cautioned and sworn, deposes and states as follows:

1. I am over the age of 18 and fully competent to make this declaration. I have personal knowledge of the statements and facts contained herein.

2. For the purposes of this litigation, I have been asked by counsel for Respondents Huffman and Cupp to analyze relevant data and provide my expert opinions.

3. To that end, I have personally prepared the report attached to this affidavit as Exhibit A, and swear to its authenticity and to the faithfulness of the opinions.

FURTHER THE AFFIANT SAYETH NAUGHT.

Executed on 21 Oct., 2021

Michael Barber

Sworn or affirmed before me and subscribed in my presence the 21st day of October, 2021, in the state of Utah and county of Utah.

Notary Public

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STATE OF UTAH

4887-6356-3008 v.1

Exhibit A:
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1 Introduction and Qualifications

I have been hired by the Respondents, President of the Ohio Senate, Matt Huffman; and Speaker of the Ohio House of Representatives, Robert R. Cupp. to provide expert testimony in the following cases: Ohio Organizing Collaborative Relators et al v. Ohio Redistricting Commission, et al (No. 2021-1210); League of Women Voters of Ohio et al v. Ohio Redistricting Commission et al (No. 2021-1193); and Bria Bennett et al v. Ohio Redistricting Commission et al (No. 2021-1198). I have been asked by the Respondents to review the districting plans considered by the Ohio Redistricting Commission in light of the requirements set forward in the Article XI of the Ohio Constitution as well as the present and past political geography of the state.

I am an associate professor of political science at Brigham Young University and faculty fellow at the Center for the Study of Elections and Democracy in Provo, Utah. I received my PhD in political science from Princeton University in 2014 with emphases in American politics and quantitative methods/statistical analyses. My dissertation was awarded the 2014 Carl Albert Award for best dissertation in the area of American Politics by the American Political Science Association.

I teach a number of undergraduate courses in American politics and quantitative research methods.[1] These include classes about political representation, Congressional elections, statistical methods, and research design.

I have worked as an expert witness in a number of cases in which I have been asked to analyze and evaluate various political and elections-related data and statistical methods. Cases in which I have testified at trial or by deposition are listed in my CV, which is attached to the end of this report. I have previously provided expert reports in a number of cases related to voting, redistricting, and election-related issues: *Nancy Carola Jacobson, et al., Plaintiffs, vs. Laurel M. Lee, et al., Defendants. Case No. 4:18-cv-00262 MW-CAS (U.S. District Court for the Northern District of Florida); Common Cause, et al., Plaintiffs,*

[1]The political science department at Brigham Young University does not offer any graduate degrees.

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vs. Lewis, et al., Defendants. Case No. 18-CVS-14001 (Wake County, North Carolina); Kelvin Jones, et al., Plaintiffs, v. Ron DeSantis, et al., Defendants, Consolidated Case No. 4:19-cv-300 (U.S. District Court for the Northern District of Florida); Community Success Initiative, et al., Plaintiffs, v. Timothy K. Moore, et al., Defendants, Case No. 19-cv-15941 (Wake County, North Carolina); Richard Rose et al., Plaintiffs, v. Brad Raffensperger, Defendant, Civil Action No. 1:20-cv-02921-SDG (U.S. District Court for the Northern District of Georgia); Georgia Coalition for the People's Agenda, Inc., et. al., Plaintiffs, v. Brad Raffensberger, Defendant. Civil Action No. 1:18-cv-04727-ELR (U.S. District Court for the Northern District of Georgia); Alabama, et al., Plaintiffs, v. United States Department of Commerce; Gina Raimondo, et al., Defendants. Case No. CASE NO. 3:21-cv-00211-RAH-ECM-KCN (U.S. District Court for the Middle District of Alabama Eastern Division).

In my position as a professor of political science, I have conducted research on a variety of election- and voting-related topics in American politics and public opinion. Much of my research uses advanced statistical methods for the analysis of quantitative data. I have worked on a number of research projects that use "big data" that include millions of observations, including a number of state voter files, campaign contribution lists, and data from the US Census. I have also used geographic information systems and other mapping techniques in my work with political data.

Much of this research has been published in peer-reviewed journals. I have published nearly 20 peer-reviewed articles, including in our discipline's flagship journal, *The American Political Science Review* as well as the inter-disciplinary journal,*Science Advances.* My CV, which details my complete publication record, is attached to this report as Appendix A.

The analysis and opinions I provide in this report are consistent with my education, training in statistical analysis, and knowledge of the relevant academic literature. These skills are well-suited for this type of analysis in political science and quantitative analysis more generally. My conclusions stated herein are based upon my review of the information available to me at this time. I reserve the right to alter, amend, or supplement these conclu-

sions based upon further study or based upon the availability of additional information. I am being compensated for my time in preparing this report at an hourly rate of $400/hour. My compensation is in no way contingent on the conclusions reached as a result of my analysis. The opinions in this report are my own, and do note represent the view of Brigham Young University.

2 Summary of Findings

Based on the evidence and analysis presented below, my opinions regarding the 2021 redistricting process in Ohio can be summarized as follows:

- The contemporary political geography of Ohio is such that Democratic majorities are geographically clustered in the largest cities of the state while Republican voters dominate the suburban and rural portions of the state.
- This geographic clustering puts the Democratic Party at a natural disadvantage when single-member districts are drawn.
- This disadvantage arises from the difficulty, and in many cases impossibility, of drawing Democratic-leaning districts in the more rural parts of the state that comply with constitutional requirements, even though Democratic voters make up roughly one third of voters in these parts of the state.
- A map maker who wishes to draw a plan that is proportionate to the statewide election results must therefore intentionally draw districts that disproportionately favor the Democratic Party in the urban parts of the state to make up for the Republican disproportionality that naturally occurs in the rural and exurban portions of the state.
- This present spatial distribution of voters in Ohio has not always been the case historically.

HC_0544

- A review of maps considered by the Commission reveals broad agreement across the vast majority of the state.
- Areas of disagreement between proposed plans arise because the plan proposed by Senator Sykes disproportionately favors the Democratic Party in the urban and suburban parts of the state.

3 Political Geography of Ohio

3.1 Statewide, Ohio Leans Republican

For the last several decades, Ohio has been relatively competitive in statewide elections. Democratic and Republican candidates have won the state at the presidential, gubernatorial, congressional, and state level. Figure 1 below shows the results of the average of statewide elections in Ohio from 1992 through 2020. These races include: president, US Senate, governor, attorney general, state auditor, secretary of state, and treasurer.[2] While not all races are up for election in each year, I create the index by averaging the two-party vote share of those races that occurred in each two-year cycle. State-level races in Ohio occur in non-presidential election years while US senate races occurred in all years except 1996, 2002, 2008, and 2014. As can be seen in the figure, the statewide Democratic margin in Ohio peaked in 2006 at 56% of the two-party vote and reached its nadir in 1994 with only 34% of the vote. However, setting aside a particularly bad year for Democrats in 1994, the share of votes won by Democratic candidates has tended to remain between 40% and 55% of the vote, with Republicans winning a majority of the statewide vote in 10 of the 15 years considered here.

Article XI Section 6(B) of the Ohio Constitution indicates that map drawers should

[2]To create the index I sum by party all votes cast for each candidate in each race by year. I then take the fraction of votes cast for candidates of the two major parties that were cast for Democratic candidates in that year. There are other possible measures and methods one could use, such as considering candidate percentages before averaging, including third party voters, or looking at election outcomes.

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look at statewide and federal general election results during the last ten years (2012-2020). As other reports have also shown, this calculation yields a statewide vote share for Democrats of 45.9% and 54.1% for Republicans. Because of data availability, other reports have also noted the statewide share of votes during the 2016-2020 period.[3]. This calculation yields a statewide vote share for Democrats of 46.8% and 53.5% for Republicans.

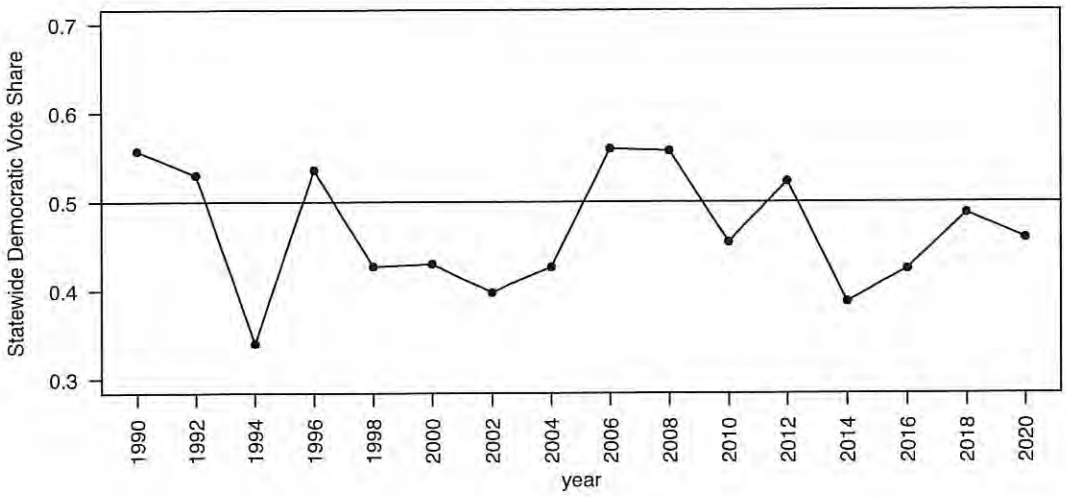

Figure 1: **Average Statewide Election Results Over Time**

3.2 Partisan Preferences Are Not Even Distributed

The relative stability of the statewide results over the last 30 years masks a dramatic change over the same period of time in the spatial location of Democratic and Republican voters within the state. The following section details this and shows in a variety of different ways that Democratic voters have become clustered in the urban areas of the state while suburban and rural portions of the state have trended towards Republicans over the same period of time.

I first note the contemporary distribution of partisan preferences in Ohio and then

[3]See report of Dr. Jonathan Rodden, para. 15

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turn to how the current distribution of preferences is dramatically different from previous decades. Figure 2 contains two maps. The left map shows the population density of Ohio, with red areas indicating portions of the state that are more densely populated with yellow and green areas showing portions of the state that are rural and sparsely populated. The right map shows an average of statewide election results across all precincts in the state for the years 2016-2020. Blue colors indicate precincts with majority Democratic voters and red colors indicate precincts with majority Republican voters. Comparing the two maps side-by-side shows an immediate pattern. Democratic voters tend to live in areas that are densely populated while Republican voters tend to live in more suburban and rural portions of the state. Scholars of political geography have noted this pattern, which is not unique to Ohio and is occurring throughout the United States with some exceptions (e.g. Brown and Enos (2021), Rodden and Chen (2013)).[4] For example, Rodden and Chen (2013) note, "Democrats are highly clustered in dense central city areas, while Republicans are scattered more evenly through the suburban, exurban, and rural periphery (pg. 241)."

We can test this idea more systematically by looking at the relationship between population density and Democratic vote shares in Ohio and measuring the correlation between the two factors. Figure 3 shows this relationship for all 88 counties in Ohio. The horizontal axis measures the population density of each county and the vertical axis shows the average Democratic vote share for statewide election in that county from 2016-2020. The dashed red line shows the "line of best fit" between the two variables.[5] As can be seen in the figure, there is a very strong and positive relationship. Counties that are more urban and densely populated are also more likely to vote for Democratic candidates. The correlation between the two variables is noted in the bottom right of the figure and is 0.74, which indicates a

[4]Brown, Jacob R., and Ryan D. Enos. "The measurement of partisan sorting for 180 million voters." Nature Human Behaviour (2021): 1-11.; Chen, Jowei, and Jonathan Rodden. "Unintentional gerrymandering: Political geography and electoral bias in legislatures." Quarterly Journal of Political Science 8, no. 3 (2013): 239-269.

[5]The line of best fit is the regression line from a simple regression of Democratic vote shares on the natural log of population density in the county. The slope of the line is 0.10 and is statistically significant at the $p<.01$ level.

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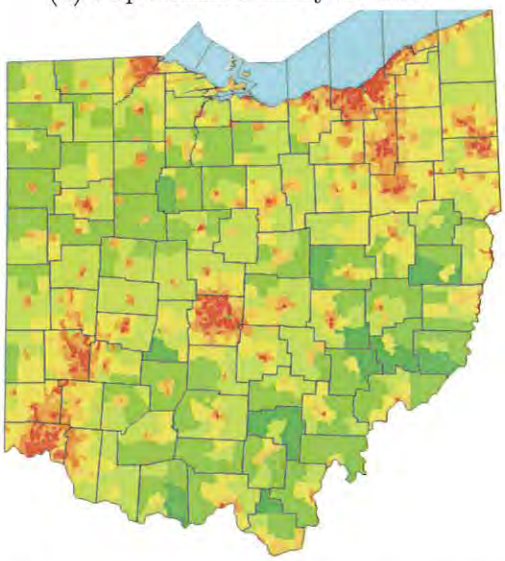
(a) Population Density of Ohio



(b) Recent Election Results in Ohio

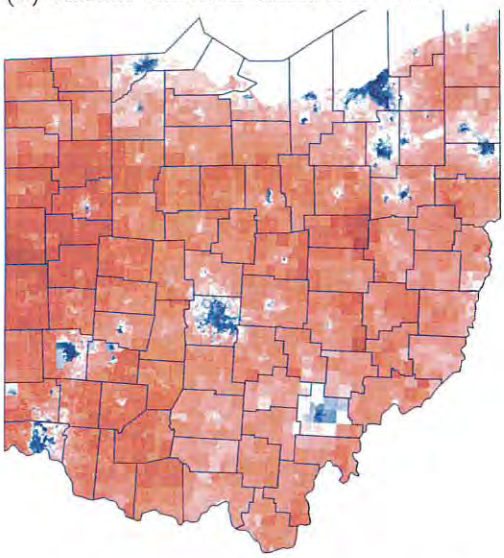


Figure 2: **Population Density (left) and 2016-2020 Precinct Election Results (right)**

very strong relationship.[6] It is instructive to look at these results at the county level because counties are important political units in the redistricting process in Ohio, as detailed in the Ohio Constitution.

While this relationship between density and Democratic votes exists across counties in Ohio, it is even the case that this relationship between Democratic support and urban areas persists when looking *within* counties. Within the most urban counties of the state, Democratic voters tend to cluster in the central, most urban and densely populated portions of the county while Republicans tend to live in the suburban periphery of these counties. To measure this I look at the six largest counties in Ohio by population - Franklin, Cuyahoga, Hamilton, Summit, Montgomery, and Lucas Counties. Each of these counties contains one of Ohio's largest cities - Columbus, Cleveland, Cincinnati, Akron, Dayton, and Toledo, respectively. To measure partisan preferences in these counties I calculate the average of statewide elections in 2016 for each precinct in each of these six counties. To measure

[6]Correlation is a measure of the strength of the relationship between two variables and ranges from -1 to 1. A value of 1 would indicate perfect correlation while a value of -1 would indicate perfect negative correlation. The further away the correlation value is from zero, the stronger the relationship between the two variables.

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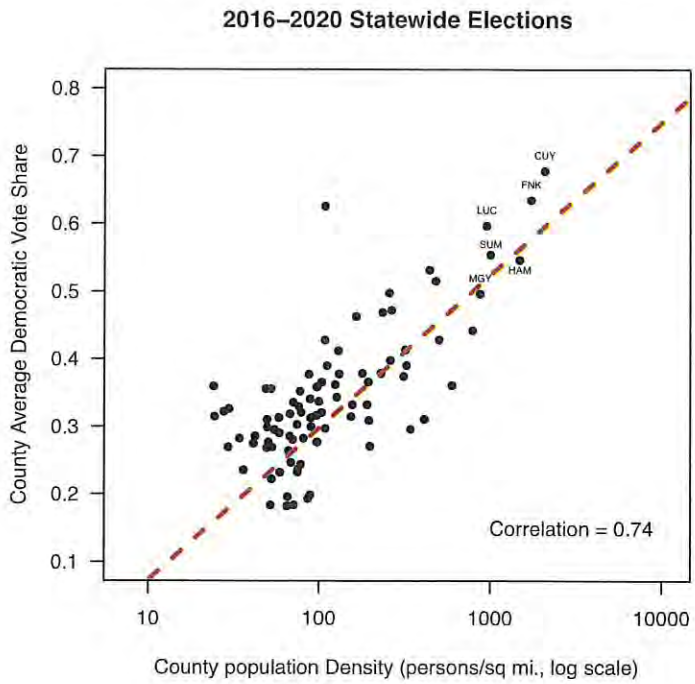


Figure 3: **Population Density and 2016-2020 County Election Results** - Each point is a county. The horizontal axis measures the population density of each county. The vertical axis measures the average Democratic vote share in that county. More dense counties tend to be more supportive of Democratic candidates.

the tendency for clustering near the urban core, I then look at the relationship between a precinct's average Democratic vote share and how far that precinct is located from the urban center of the county.[7] All six of these counties are defined by a dense urban core that radiates outward towards less dense suburban areas. Figure 4 shows this to be the case. Each point in each graph is a single precinct. The horizontal axis measures the distance in kilometers of that precinct from the center of the county. The vertical axis of each figure shows the average Democratic vote in that same precinct. A consistent pattern holds across all six counties. The closer a precinct is to the center of the county (and its associated major city) the more Democratic the precinct tends to vote. The red dashed line in each figure shows the line of best fit for this relationship in each county. In every case the line is sloped

[7] I proxy the urban center of the county by measuring the distance in kilometers each precinct is from the county courthouse.

HC_0549

downwards, indicating that as one travels away from the county's center, voters tend to be more supportive of Republican candidates. The correlation (the measure of how strong this relationship is) between these two variables is noted in the bottom right of each figure and ranges from -0.52 in Hamilton County (Cincinnati) to -0.73 in Lucas County (Toledo). A correlation greater than .5 (or less than -.5) indicates a strong relationship between the two variables.

Rodden (2019) conducts a similar "distance from urban center" analysis of Ohio and Pennsylvania across multiple election cycles and finds similar results.[8] Rodden notes the historical antecedents of this pattern, where he states, "[T]he city center is dominated by some mix of poor people, immigrants, and minorities, and they vote overwhelmingly for the parties of the left (pg. 104). He goes on to note, "Democrats win overwhelming majorities in city centers, with Republican vote share increasing as one exits the dense urban core and the working-class housing constructed in the late nineteenth or early twentieth centuries and moves to the inner-ring and then middle-ring suburbs, finally reaching its maximum in the distant exurbs and rural periphery (pg. 106)." I would add that this pattern has only been exacerbated by recent trends of young and highly educated professionals seeking to live in the dense urban core combined with recent patterns of education polarization in which those with more education tend to vote for Democratic candidates.[9]

Figure 4 established a strong relationship between Democratic voters clustering in cities and Republican voters being more dispersed thorough the suburban and rural portions of the state. In many of the precincts closest to the center of these cities, people are voting with near unanimity for Democratic candidates (e.g. the values of vertical axis (top left of each panel) approach 1.0). And as one moves further away from the urban center of the county, there is a distinct decline, on average, in support for Democratic candidates such

[8]Rodden, Jonathan A. Why cities lose: The deep roots of the urban-rural political divide. Hachette UK, 2019.

[9]https://www.nytimes.com/2021/09/08/us/politics/how-college-graduates-vote.html, https://www.pewresearch.org/politics/2016/04/26/a-wider-ideological-gap-between-more-and-less-educated-adults/

HC_0550

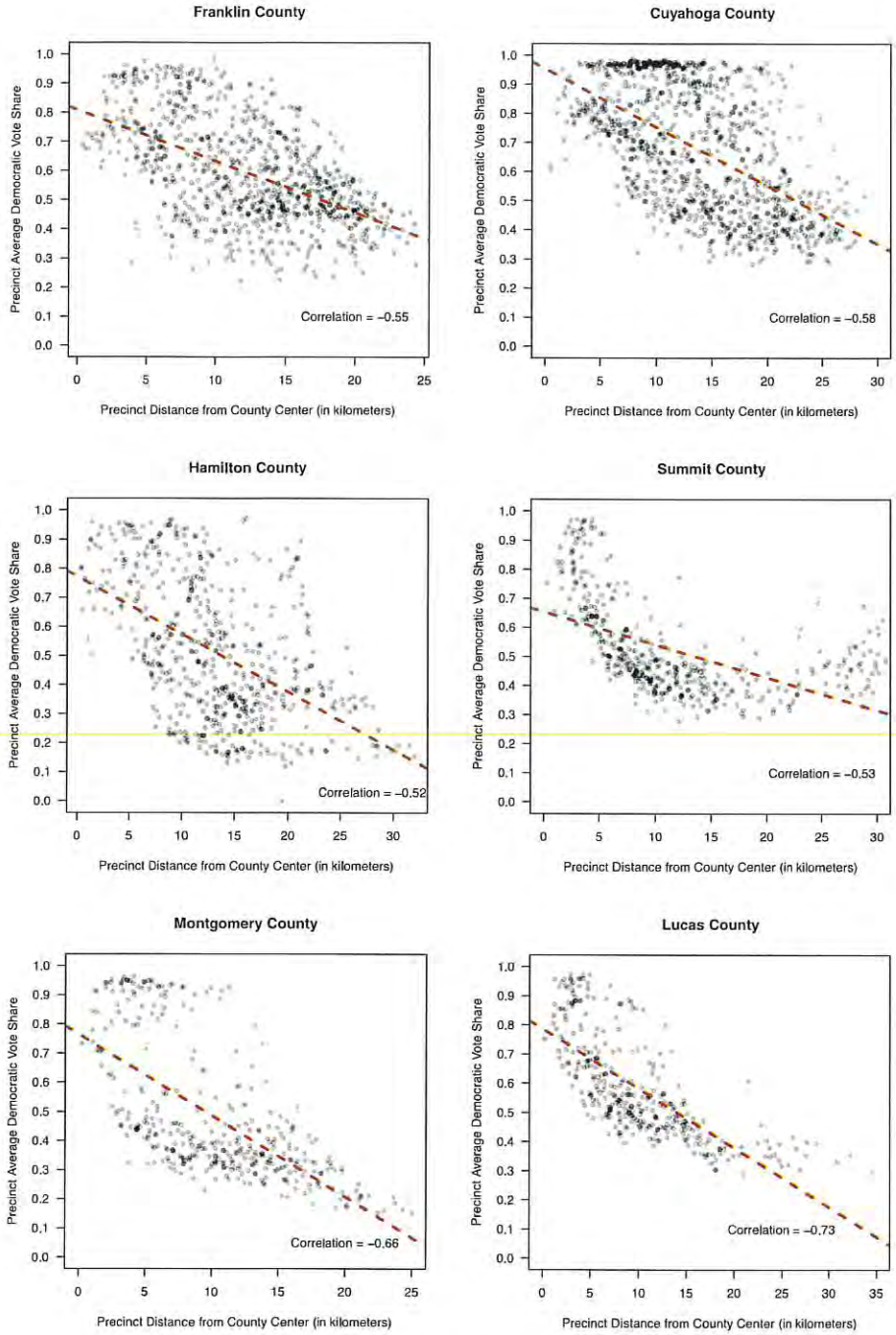


Figure 4: **Distance from County Center and Precinct Election Results** - Each point is a precinct. The horizontal axis shows the distance of that precinct from the geographic center of the county. The vertical axis shows the average Democratic voter share of that precinct. The overall trend (shown with a red dashed line) is that precincts near the urban core are heavily Democratic while precincts near the periphery of the county tend to be majority Republican.

HC_0551

that the most Republican precincts tend to be those at the periphery of each county. And while these "peripheral" precincts are less Democratic than their "core" counterparts, there is not, however, a similar pattern of precincts at the edges of the county voting with near unanimity for Republican candidates.

Another way to consider this is to look at "lopsided" precincts - areas where one party receives a vast majority of ballots cast. Figure 5 shows the distribution of two-party vote shares for all precincts in the state in 2018 (left panel) and 2020 (right panel). The red vertical line in each panel is at 0.5, which indicates precincts where voters cast exactly half of their votes for Democratic and Republican candidates. There are two important takeaways from this figure. The first is that the largest group of precincts in Ohio lean majority Republican. The peak of each distribution is near 0.4, where voters in a precinct cast 40% of their votes for Democratic candidates and 60% of their votes for Republican candidates. And while the distribution trails off in each direction, there are still a large number of precincts that cast nearly unanimous votes for Democrats. These are the precincts at the far right of each figure with values of 0.8 to 1.0. There are not, however, an equal number of precincts that voted with near unanimity for Republican candidates. This is seen in the relative paucity of precincts with values between 0 and 0.2.

HC_0552

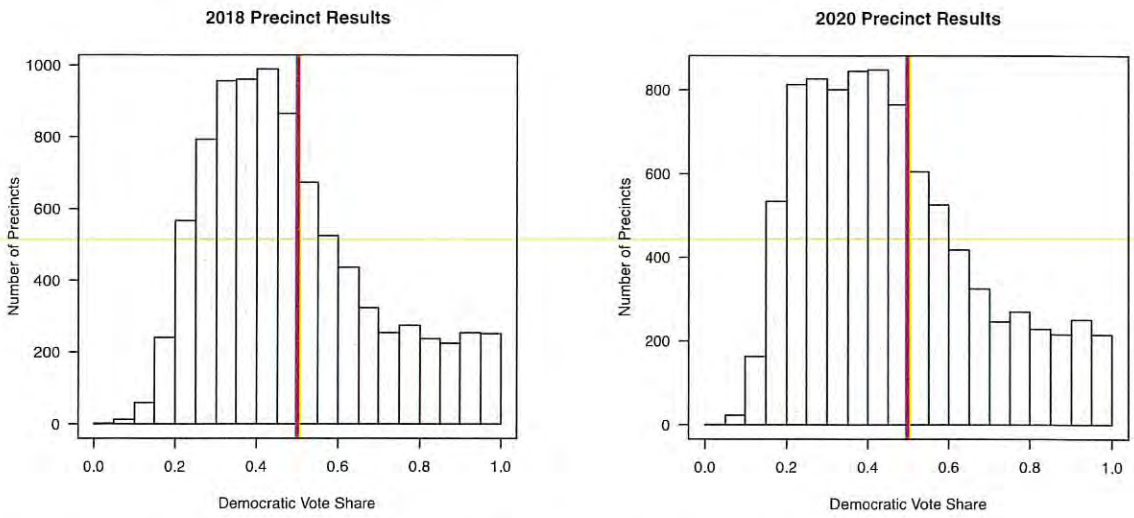


Figure 5: **Distribution of Precinct-Level Election Results for All Precincts in Ohio, 2018 (left) & 2020 (right)**

HC_0553

4 Interaction of Districting Requirements with Ohio's Political Geography

The previous section established three important points about the contemporary political geography of Ohio. First, while the state leans Republican overall, this masks significant variation in political preferences across the state. Second, this variation is highly correlated with population density both across counties and also within counties. Third, the distribution of preferences is not symmetric - most precincts lean Republican with a sizable number of precincts that are nearly unanimous in their support for Democrats.

Chen and Rodden (2013) succinctly describe how these factors combine to create a "natural disadvantage" for Democratic candidates when legislative boundaries are drawn. They note, "Precincts in which Democrats typically form majorities tend to be more homogenous and extreme than Republican-leaning precincts. When these Democratic precincts are combined with neighboring precincts to form legislative districts, the nearest neighbors of extremely Democratic precincts are more likely to be similarly extreme than is true for Republican precincts. As a result, when districting plans are completed, Democrats tend to be inefficiently packed into homogenous districts (pg. 241)."[10] Eubank and Rodden (2020) come to a similar conclusion. They state, "Democratic and Republican voters are spatially distributed in very different ways, and in many states, this difference puts Democrats at a disadvantage under a system in which representation is based on spatially contiguous, geometrically compact electoral districts, even if these are drawn without partisan intent. In particular, Democrats tend to be spatially clustered in politically homogeneous cities, while Republicans are spread out in more heterogeneous suburbs and rural areas. As a result, a districting plan that creates relatively compact districts will end up creating urban districts that have far more Democratic voters than the minimum 50% + 1 required to win the district, resulting in many "wasted" Democratic votes. Republicans, by contrast, tend to live

[10] Jowei Chen and Jonathan Rodden. 2013. Unintentional Gerrymandering: Political Geography and Electoral Bias in Legislatures. *Quarterly Journal of Political Science* 8: 239-269

HC_0554

in areas that are more heterogeneous, leading to the creation of districts where Republicans win districts by narrower margins, thus wasting fewer Republican votes."[11]

The natural disadvantage for Democrats due to the contemporary spatial distribution of their voters is made worse by several of the requirements in the Ohio Constitution. Given the clustering of Democratic votes in city centers, a map maker who was intent on producing a proportional map that aligned the projected statewide seat share in the legislature with the statewide vote share could take a number of approaches. One such approach would be to create districts that emanate in a radial manner (like slices of pizza) from the urban core so as to create districts that are only slight majorities for Democratic candidates. In this scenario each "slice" would contain a portion of the heavily Democratic city while also taking in a substantial portion of the more Republican suburbs and exurbs. In some of the largest cities in Ohio (like Columbus and Cleveland) this strategy might require these "pie" districts to extend beyond the county and into adjacent counties. A second approach might be to string together several smaller Democratic cities that are not sufficiently large to support their own district so as to gather enough people from Democratic areas of the state to create a Democratic "snake" district through the otherwise rural, heavily Republican parts of the state.

These two approaches, of course, run afoul of the Ohio Constitution in a number of ways. The first scenario would be in violation of Article XI, Section 3 by splitting multiple counties and municipalities in order to create these hypothetical "pie" shaped districts that radiate out from the large urban centers. The second hypothetical of stringing together smaller Democratic cities would also necessitate splitting multiple counties and would furthermore violate Article XI, Section 6(C) that states that districts should be compact. In other words, the constitutional requirement that districts not span county boundaries unnecessarily means that Democratic voters are going to be clustered together into districts in urban counties that are heavily Democratic. Furthermore, the constitutional requirement to

[11]Eubank, Nicholas, and Jonathan Rodden. "Who Is My Neighbor? The Spatial Efficiency of Partisanship." Statistics and Public Policy 7, no. 1 (2020): 87-100.

HC_0555

minimize the division of municipalities within counties further ensures heavy clustering of Democratic voters in these districts.

Given the importance of county and municipal boundaries in the drawing of districts, classifying Ohio and its 88 counties according to a partisan and geographic metric can help illustrate the geography problem that faces Democrats in the state and why a plan that adheres to the constitutional requirements of minimizing county and municipal splits will struggle (if not fail outright) to simultaneously achieve proportionality of districts with statewide election results. As a point of reference, the population of Ohio was 11,799,448 at the time of the 2020 US Census. This population divided by the 99 districts in the Ohio House of Representatives yields an "ideal" district size of 119,186 people (±5%, 5,959 people).[12] And while districts will by necessity split some counties and municipalities, considering the different types of counties in the state, their share of the overall population, and their subsequent share of the districts in the legislature is helpful for understanding exactly how geography interacts with and impacts the districting process before any lines have even been drawn.

4.1 Uniformly Republican Counties

There are 65 counties in Ohio that, based on the 2016-2020 statewide voting index described above, have fewer than 10 precincts that voted majority Democratic.[13] In other words, these counties are not only strongly Republican overall, but support for Republican candidates is also spread evenly across the county. The 2020 Census population of these counties collectively was 3,762,021 people, which when divided by the ideal district size of

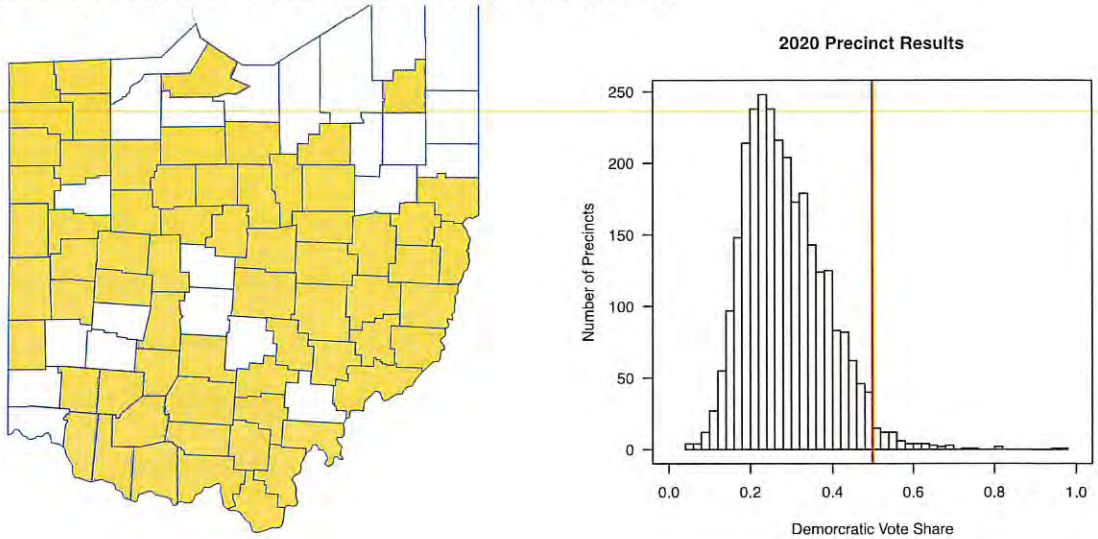
[12]The Ohio Constitution requires Senate districts to be composed of three contiguous House districts. Thus, the ideal district size for a Senate district is simply $3 \times 119{,}186 = 357{,}558$. Likewise the Senate chamber is composed of $99/3 = 33$ seats.

[13]These counties are: Adams, Ashland, Auglaize, Belmont, Brown, Carroll, Champaign, Clermont, Clinton, Columbiana, Coshocton, Crawford, Darke, Defiance, Fayette, Fulton, Gallia, Geauga, Guernsey, Hancock, Hardin, Harrison, Henry, Highland, Hocking, Holmes, Huron, Jackson, Jefferson, Knox, Lawrence, Licking, Logan, Madison, Marion, Medina, Meigs, Mercer, Miami, Monroe, Morgan, Morrow, Muskingum, Noble, Ottawa, Paulding, Perry, Pickaway, Pike, Preble, Putnam, Richland, Ross, Scioto, Seneca, Shelby, Tuscarawas, Union, Van Wert, Vinton, Warren, Washington, Wayne, Williams, and Wyandot.

HC_0556

119,186 indicates that these counties collectively account for roughly 31.5 districts of the 99 district chamber, or nearly 1/3 of the House chamber.[14] A map of these counties is shown below as Figure 6. The right panel of the figure shows the distribution of precinct election results in these counties for the 2020 Presidential election. As can be seen, there are very few majority Democratic precincts (those to the right side of the vertical line in the graph). Collectively these counties lean Republican by a more than 2:1 margin (69% R, 31% D). However, because Republicans are a majority in nearly every precinct across these counties, it would literally be impossible to assemble even one Democratic district from these counties, despite the fact that Democratic voters are roughly one third of the population.

Figure 6: **Counties with 10 or Fewer Majority Democratic Precincts (left) and Precinct Election Results in Those Counties in 2020 (right)**



(a) Map of Counties

(b) Election Results in These Counties

4.2 "Purple Cluster" Counties

There are 17 counties that I have labeled "purple cluster" counties because they all show a similar geographic pattern - each county is mostly Republican with a small to

[14]The same would be true of the Ohio Senate, which is just the House number divided by 3, or 10.5 districts.

HC_0557

medium sized town that is majority Democratic.[15] Collectively these counties had a 2020 population of 3,109,148 people, which when divided by the ideal district size of 119,186 yields approximately 26 districts, or approximately 1/4 of the districts in the House chamber.[16] A map of these counties is shown below in the left panel of Figure 8. The right panel of the figure shows the distribution of precincts election results in those counties for the 2020 Presidential election. The graph shows that in these counties there are a number of Democratic leaning precincts, and collectively these counties are less Republican leaning than the rural counties discussed above. However, they still lean Republican at a rate of 56% R to 44% D. Furthermore, considered separately, all but three of these counties are majority Republican. Athens, Lorain, and Mahoning Counties lean Democratic. In some cases these "blue dots" are relatively small municipalities, such as Lima (2020 pop. 35,579), Bowling Green (2020 pop. 30,808), and Sandusky (2020 pop. 25,095) in Allen, Wood, and Erie Counties, respectively. In other cases these towns are somewhat larger, such as Youngstown (2020 pop. 60,068), Lorain (2020 pop. 65,211), and Canton (2020 pop. 70,872) in Mahoning, Lorain, and Stark Counties, respectively. In the case of the counties with smaller municipalities, despite having a cluster of majority Democratic precincts, there are still insufficient Democratic voters to allow for any map drawer to construct a Democratic leaning district given the requirement that each district contain a population of 119,186. The only available path would be to split a neighboring urban county to collect more Democratic leaning voters. This would violate the constitutional provision to avoid splitting counties unnecessarily. But beyond this prohibition, in many cases these counties are not adjacent to the large urban counties and thus no option is present at all, constitutional or not. An example of this is Athens County, which leans Democratic (63% D, 37% R). However, Athens County is not large enough to constitute its own House district (2020 population = 62,431). Thus, Athens County must be combined with some portion of a neighboring county or

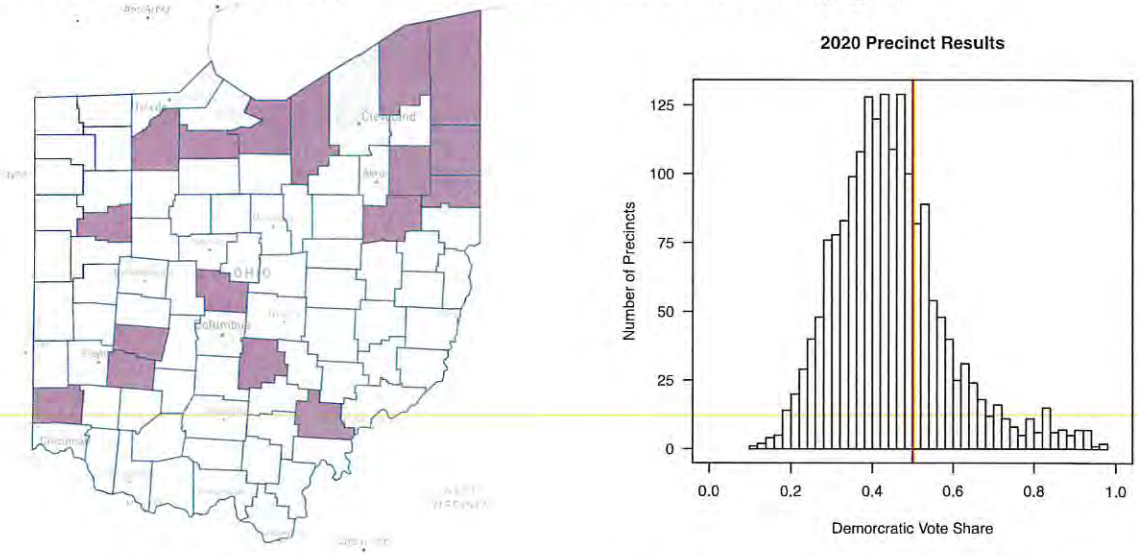
[15]These counties are: Allen, Ashtabula, Athens, Butler, Clark, Delaware, Erie, Fairfield, Greene, Lake, Lorain, Mahoning, Portage, Sandusky, Stark, Trumbull, and Wood.

[16]In the Senate this would be 8.7 districts.

HC_0558

counties. However, all of these counties are strongly and nearly uniformly Republican and the Democratic margin in Athens County is not large enough to withstand the addition of an adjacent heavily Republican county. This means that whatever district is drawn to include Athens County will end up with an overall lean towards Republicans.

Figure 8: **Counties with Democratic Clusters Surrounded by Republican Areas (left) and Precinct Election Results in Those Counties in 2020 (right)**



(a) Map of Counties

(b) Election Results in These Counties

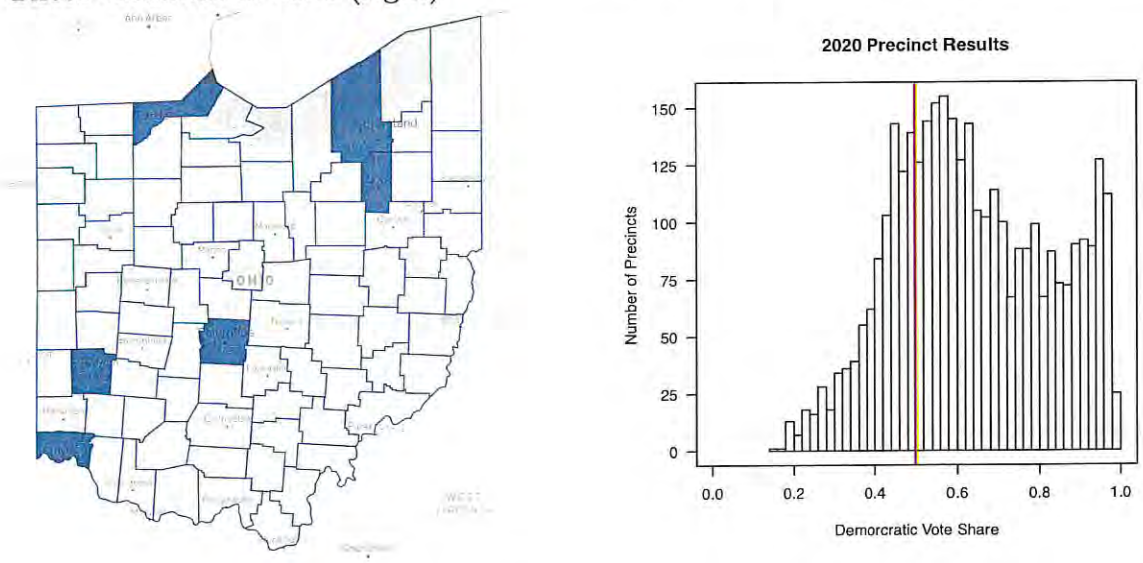
In the purple counties with larger urban populations it is possible to create a Democratic leaning district by combining the strongly Democratic city with its more Republican suburbs. This is the case in Trumbull, Mahoning, Portage, Lorain, and Stark Counties. And in both the Enacted Plan and the Sykes 3rd Plan the map drawers do exactly this (something I will discuss in greater detail in later sections). However, this is only 5 counties where it is possible to draw Democratic leaning districts among a group of 17 counties that contain a population that collectively accounts for 26 House districts. The asymmetry in the geographic distribution of voters in these counties again works strongly against statewide proportionality in seat shares versus vote shares before anyone has drawn any district boundaries on a map.

HC_0559

4.3 Urban Blue Counties

The six remaining counties are the most populous and Democratic leaning counties in the state.[17] Collectively these counties had a 2020 Census population of 4,928,279 people, which when divided by the ideal district size of 119,186 yields approximately 41 districts of the 99 seat House of Representatives.[18] A map of these counties is shown below in the left panel of Figure 10. The distribution of precinct election results for the 2020 Presidential election is shown in the right panel of the figure. Collectively these counties lean Democratic at a rate of 60% D, 40% R. All six of these counties share the similarity of being dominated by a large city with several other smaller cities and suburbs surrounding it.

Figure 10: **Large Democratic Leaning Counties (left) and Precinct Election Results in Those Counties in 2020 (right)**



(a) Map of Counties

(b) Election Results in These Counties

At this point, the mandate for statewide proportionality intersects with the reality of the geography of Ohio. The two previous groups of counties collectively account for 82 of the 88 counties in Ohio and nearly 60% of the state's population (and associated House seats), and yet it was only possible to create Democratic leaning districts in five of those counties.

[17] These counties are: Cuyahoga, Franklin, Hamilton, Lucas, Montgomery, and Summit.

[18] In the Senate these counties would account for 13.7 districts.

HC_0560

Recall that over the last ten years of statewide elections, Republican candidates have won 54.1% of the statewide two-party vote share and Democratic candidates have won 45.9%. To achieve statewide proportionality, the associated seat share in the legislature would require roughly 45 Democratic leaning House seats.[19] In order to accomplish this, a map maker would need to take the 5-6 possible Democratic districts from the previous two groups of counties and add to it 39-40 Democratic seats from the 41 seats allocated to the six most populous counties in the state.

In other words, the political geography of present-day Ohio is such that in order to achieve statewide proportionality between the partisan lean of seats in the legislature with the historical statewide vote share, the remaining districts in these six urban counties that are only 60% Democratic would need to be drawn to create a nearly unanimous suite of Democratic districts. This would not be an issue if it were the case that precincts in these counties were all or nearly all majority Democratic leaning - more or less the opposite of what is the case in the 65 rural Republican counties discussed earlier. However, this is not the case. While these counties lean heavily towards Democrats overall, there are still a large number of precincts that are also majority Republican. We see this in the right panel of Figure 10, where there are many precincts below 0.5, indicating precincts that were majority Republican. Furthermore, many of these Republican leaning precincts inside the urban counties are adjacent to one another, thus making it possible to create majority Republican districts in these counties that are contiguous, compact, and do not split county or municipal boundaries.

Thus, to draw a statewide proportionate map, a potential map maker faces a quandary. In order to make up for the deficit of Democratic districts in rural and suburban Ohio caused by the spatial distribution of voters in this part of the state he must intentionally draw districts in the urban counties of the state that disproportionately benefit Democrats. In other words, partisan geographic sorting in rural and suburban parts of Ohio makes it impossi-

[19] 15 Democratic leaning Senate seats.

HC_0561

ble for any map maker to draw majority Democratic districts in nearly all of these areas. Thus, the map maker must intentionally introduce disproportionality in the urban parts of the state to make up for geographically induced disproportionality in the rural parts of the state. This, however, runs contrary to Article XI, Section 6(A) of the Ohio Constitution, which prohibits the drawing of a district plan to primarily favor or disfavor a political party.

5 Comparisons to Historical Results are Problematic

In the previous section I showed that the geographic distribution of Republican and Democratic voters in Ohio creates a natural disadvantage for Democratic voters when single-member districts are drawn. This particular pattern, however, has not always been the case in the state. The change over time is important for two reasons. First, the political geography of the state has gotten worse for Democrats over the last 30 years and associated three rounds of redistricting, regardless of who was in charge of drawing the district boundaries. Second, the contemporary political geography of the state is very different from previous decades, and as such, comparisons to previous redistricting plans are problematic because we do not know if the difference in the partisan lean of the districts is the result of different lines being drawn or voters' preferences in the state shifting. In other words, the same map from today applied to voters from 30 years ago may yield a very different result. And likewise, a map from 30 years ago applied to today's distribution of voters might produce very different outcomes.

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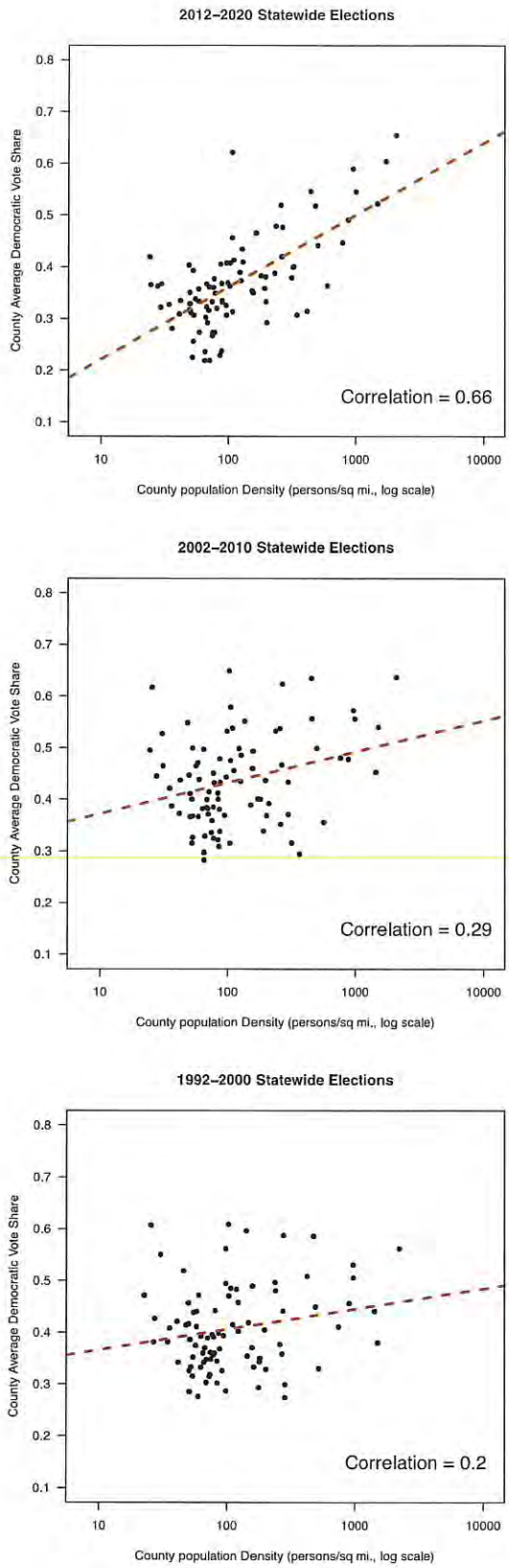

Figure 12: **County Population Density and Election Results Across 3 Decades** - The relationship between population density and Democratic vote shares has grown stronger over the last three decades. This is indicated by the steeper slope of the line in each plot and the tighter clustering of points around the line in later decades.

HC_0563

Figure 12 is similar to Figure 3, which showed the correlation between county population density and each county's average two-party Democratic vote share. Figure 12 shows the same thing, but looks back over the last 3 decades and associated rounds of redistricting (2012-2020 top panel of Figure 12, 2002-2010 middle panel, and 1992-2000 bottom panel). As before, each point is a county. The horizontal axis measures the population density of that county. The vertical axis measures the average Democratic vote share in that county during that decade.

Figure 12 shows that the contemporary pattern of a strong relationship between population density and Democratic votes has not always been the case in Ohio. In the 1992-2000 period the correlation was only 0.20, indicating a weak association between the two variables. This is seen in the bottom panel of Figure 12. The slope of the dashed red line (the line of best fit) is relatively flat and the points (counties) are not tightly clustered near the line. By comparison, the correlation over the most recent decade (the top panel of Figure 12) was more than three times higher (0.66), indicating a much stronger relationship. This is evident by the steeper slope of the red dashed line and the tighter clustering of the points around the line. Recall that in Figure 3, which showed this correlation for the 2016-2020 period, the association was even stronger (correlation = 0.74, which indicates a very strong relationship). The practical implications of this change in the political geography of the state is that in previous decades Democratic and Republican voters were more evenly distributed across the state, and as such, neither party faced a significant geographic disadvantage when it came time to divide the state into single member districts.

Figure 13 shows this same idea of geographically polarizing preferences in Ohio by considering the average Democratic vote shares in Ohio's largest, mid-sized, and smallest counties by population over time from 1978-2020.[20] Figure 13 shows that the political behavior of these three groups of counties has change dramatically over the last 40 years.

[20] I define "large" counties as Cuyahoga, Franklin, Hamilton, Lucas, Montgomery, and Summit counties. "Mid-size" counties include Butler, Stark, Lorain, Warren, Lake, Mahoning, Delaware, Clermont, Trumbull, Medina, Licking, Greene, Portage, Fairfield, Clark, Wood, Richland, and Wayne. "Small" counties are all remaining counties.

HC_0564

Prior to the mid-2000s these three groups of counties more or less moved together from election to election. As Democrats did better (or worse), their vote shares tended to move in roughly the same direction across all three groups of counties. However, in recent years we see a significant polarization in the political preferences of these three groups of counties. Large counties have trended towards support for Democratic candidates while at the same time small and mid-sized counties have trended towards support for Republican candidates. In 2020 the difference in average support for Democratic candidates between the large and small counties was the largest it has ever been — 33 percentage points. As can be seen, the political landscape of contemporary Ohio is dramatically different than the past.

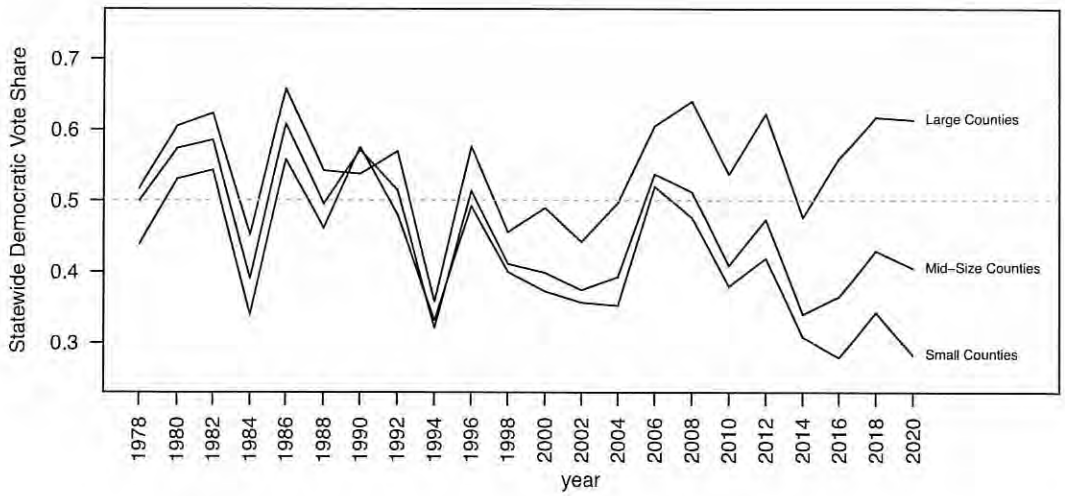

Figure 13: **Divergence in Election Results across Counties, 1978-2020**

Because of this dramatic sea change in political behavior in the state, comparing the current district plans and their associated metrics to previous redistricting plans is problematic and conflates the degree to which partisan outcomes, proportionality, and other metrics are the result of changes in the district boundaries versus changes in the political geography of the state. As noted above, the political landscape of Ohio in 2020 is very different than in 2010 let alone any comparisons between today and political outcomes several decades

HC_0565

ago. The reason that this is important is that various reports from the Relator's experts compare the partisan indices and subsequent proportionality analyses of the current plan to plans enacted over the previous decades in Ohio. After doing this they draw conclusions that the current Enacted Plan is an "extreme partisan gerrymander" compared to historical plans. These comparisons, however, are problematic because not only have the district lines shifted, but the location and strength of support for the two parties has also shifted at the same time. Another way of stating this issue is that these comparisons across time are akin to comparing the current plan in Ohio to redistricting plans being enacted in nearby states - say Pennsylvania, Indiana, or West Virginia. One would be hard pressed to argue that comparing Ohio's current redistricting plan to the current plan in West Virginia would provide much insight into the validity or constitutionality of the Ohio plan, despite the fact that West Virginia is a neighbor to Ohio.

The same argument, however, is true when comparing the 2021 plan in Ohio to the 2011 plan, the 2001 plan, or a plan enacted prior to that. Ohio in 2021 is not the same state that it was in 2011, 2001, or any other decade before that. New voters have moved into and out of the state. Voters have moved within the state. And the distribution of partisan preferences across the state have shifted dramatically. As a result the political landscape has also changed dramatically. Figure 13 above shows exactly this - the location and spatial distribution of Democratic and Republican voters in Ohio in 2021 is very different than the location and spatial distribution of Democratic and Republican voters in previous decades. And this spatial distribution of voters has important implications for the ability of map drawers to create maps that are proportionate with statewide election results - specifically, the recent clustering of Democratic voters into the urban cores and decline of support for Democratic candidates in rural parts of the state has made it more difficult to achieve statewide proportionality when map drawers are still required to adhere to strict geographic and population constraints.

The multi-decade patterns observed here were not forgone conclusions at the time,

and nor will they necessarily hold in the future either. Politics is dynamic, with the parties and voters continually adapting and changing in response to one another. With that in mind, there is nothing stopping Democrats in Ohio from recognizing their present "geography problem" and changing the issues they campaign on, the voters they appeal to, or the messaging they craft for their campaigns in order to produce a geographically broader coalition of voters who are more spatially distributed across the state. However, the fact is that in an electoral system that uses single member districts, whichever party's voters are geographically clustered versus being spread more efficiently throughout the state stands at a natural disadvantage. Alternatively, if the state is committed to consistently achieving a result in the legislature that is proportional to statewide election results, then it might consider a proportional electoral system that abandons the geographically-based single member district. The hallmark of proportional electoral systems is the abandonment of the single member district for multi-member districts. These multi-member districts could contain as few as two legislators or could be as large as a single statewide district from which all 99 members of the House (or 33 members of the Senate) are elected.[21]

5.1 How Much has Redistricting Affected Proportionality in the Past?

I am not suggesting in the previous section that we cannot learn anything by looking at past elections and historical voter preferences in Ohio. When looking at past election results, we can glean information regarding the historical impact of redistricting on the two parties' vote shares, how those vote shares are translated to legislative seats, and the subsequent proportionality analyses that follow from those two results. Professor Warshaw provides data on the statewide proportionality bias in the Ohio State House and Senate

[21] See https://www.fairvote.org/how_proportional_representation_elections_work and https://www.ncsl.org/research/elections-and-campaigns/alternative-voting-systems.aspx#proportional for detailed discussions of proportional electoral systems.

HC_0567

from 1970 to 2020 in Figure 3 of his report.[22] The figure shows a general trend over a 50 year period from large proportionality bias in favor of Democrats (i.e. Democrats holding a larger proportion of seats than their statewide vote share) towards a large proportionality bias in favor of Republicans (i.e. Republicans holding a larger proportion of seats than their statewide vote share) in more recent decades. It is important to note, however, that this shift did not occur all at once, nor does it perfectly coincide with elections held immediately before and after redistricting cycles (the elections held in years ending in "0" and "2"). If proportionality were primarily an issue caused by map drawers carefully creating districts that give an outsized advantage to their party, we would expect to see large shifts around these redistricting cycles and less of a shift in the elections that occur in the middle of the decade when the boundaries of the districts are held constant. However, we see some of both. This indicates that it is difficult to parse out exactly how much of the proportionality bias to ascribe to the map's boundaries and how much to assign to the shifts in political preferences and the political geography of the state that occur in the middle of the decade while the legislative boundaries are held constant.

For example, in the top panel of Figure 3 of Dr. Warshaw's report we see a decline in proportionality around the 1990 redistricting cycle in the Ohio House. This is a critical cycle since in this period Republicans gained a majority of the 5-member apportionment board that was responsible for drawing the state legislative boundaries in that cycle. However, the drop between 1990 and 1992 is actually correcting for significant Democratic bias in the 1990 election and all previous elections back to 1970. Moreover, the drop between 1990 and 1992 does not go from Democratic proportionality bias to Republican proportionality bias. In fact, the bias in 1992 is nearly zero - indicating a map that produced seat shares that were roughly in line with vote shares in the state. There is, however, a decline in proportionality over the next several years from 1992 to 1996 where the proportionality bias trends to nearly 8 percentage points in favor of Republicans. The important thing to

[22] See Warshaw Report, pg. 19

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note here is that the entirety of the decline in proportionality occurred while the legislative boundaries remained fixed. Thus, it would be difficult for one to argue that the map's boundaries caused the decline in proportionality from 1992 to 2006 rather than natural changes in political preferences and partisan geography during the within-districting period. Furthermore, when the districts were redrawn again between the 2000 and 2002 elections we see no significant change in the proportionality of the results across those two years.

The final pattern to note in the top panel of Figure 3 of Dr. Warshaw's report is the large change in proportionality bias that occurred during the decade from 2004 through 2012. Here we see a rise in the line (a decrease in proportionality bias) beginning with the 2006 election and peaking in the 2008 election which yielded a nearly proportional outcome. The 2010 and 2012 elections then see a decline and return to the pre-2006 levels near 9%. A myopic look at the 2010 to 2012 results might suggest that the redistricting that occurred between those two years resulted in an increase in proportionality bias for Republicans. A more complete look shows that this 2-year change is part of a broader, multi-year trend. A similar change in proportionality (in the other direction, but similar in magnitude) occurred only four years prior to that between 2004 and 2008 while district boundaries were unchanged.

The lower panel of Figure 3 in Professor Warshaw's report shows an even stronger argument for the case that changes in proportionality in Ohio are largely due to gradual political trends in the state and not the result of punctuated changes in map boundaries that occur across redistricting periods. When looking at the Senate, we see no large shifts around the redistricting election cycles at all. Instead, what dominates the figure is a long and steady trend away from proportionality bias in favor of Democrats during the 1970s to proportionality bias in favor of Republicans slowly growing in the decades between 1980 and the present. While this trend does not support the argument that redistricting is the primary cause of the change in proportionality bias, the trend does, however, align with the multi-decade shifts in political preferences and geographic polarization shown in Figures 12 and 13 of this report.

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6 Partisan Lean of Proposed Plans

In this section I begin with a comparison of four different districting plans considered by the Ohio Redistricting Commission. The first two are plans introduced by Senator Huffman, the first on 9 September 2021 (hereafter, "Huffman Plan") and the second plan being the plan that was eventually adopted by the commission (hereafter, "Enacted Plan"). The other two plans I consider are maps introduced by Senator Sykes on 1 September 2021 (hereafter, "Sykes 1st Plan") and a revision of that plan introduced on 15 September, 2021 (hereafter, "Sykes 3rd Plan"). I look specifically at these four plans for several reasons. First, the Enacted Plan has been "enacted," and is the source of the present litigation. The Huffman Plan and the two Sykes Plans are also the only other plans directly introduced by members of the Redistricting Commission. I spend the majority of the time in this section considering the final plans presented by Senator Huffman and Senator Sykes as they represent the final proposals from each member of the commission and reflect any edits, revisions, or alterations that were considered and incorporated.

I have statewide elections results from 2016-2020 aggregated to the legislative district level for both the House and the Senate for all four of the plans mentioned above.[23] For each proposed district I average together the two party vote share for these statewide races to create a partisan index for each proposed legislative district. Districts with a partisan index above 0.50 I classify as Democratic leaning districts and those with a partisan index less than 0.50 I classify as Republican leaning districts. The results of this exercise are displayed below in Table 1. The differences between the first plans produced by Senator Huffman and Senator Sykes and the final plans they introduced decreased, indicating some degree of negotiation and/or discussion between the commission members. For example, in the House plans the Enacted Plan contains five more Democratic leaning districts than the Huffman

[23]My understanding is that there is a lack of agreed upon statewide elections data aggregated to the proposed state legislative districts level for the 2012-2014 election cycles (see Rodden report, para. 15). During 2016-2020 there were eight statewide elections. US President in 2020; US Senate, Governor, Attorney General, Auditor, Secretary of State, and Treasurer in 2018; US President and US Senate in 2016.

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Plan and the Sykes 3rd Plan contains two fewer Democratic districts than the Sykes 1st Plan. Similarly, in the Senate plans, both commissioners reduced the number of districts that lean towards their respective parties by one seat.

It is important to note that partisan averages — such as the ones I have created here, and similar indices used in other reports in these cases — are useful, but not perfect. Every legislative race is different. Individual candidate factors such as prior legislative experience, professional background, gender, and ties to the local community are all important factors in determining candidate success. Campaigns and the issues and policies that candidates choose to emphasize and endorse are also important. These factors all contribute to making each race unique and slightly different from what an index of statewide election results might predict. As an example, using the districts from the 2012-2020 redistricting cycle, I compare actual state legislator election results in 2018 (2016 & 2018 for the Senate where even and odd numbered districts rotate elections) with averages of statewide election results for Governor, US Senate, and President in those same districts in 2016-2018.[24] As one would expect, there is going to be some amount of slippage between the actual election result and what is predicted by the partisan index of statewide election results. Across the 99 districts in the House, the average difference between the actual election results and the partisan index for each district was 5 points in the House. This difference was 3.7 points in the Senate. The partisan index misclassifies the party of the winning state legislative candidate in 10 different districts across both chambers. As such, we should take all partisan indices with an appropriately sized grain of salt. They can certainly tell us about general trends, but no one should believe that they are going to perfectly predict election results in any given district, nor are they going to perfectly predict the composition of the state legislature.

[24] I use old 2012-2020 districts because there have not been any actual elections in the new districts yet. I do not have statewide election results in these years for Attorney General, Auditor, Secretary of State, and Treasurer aggregated to the old state legislative district boundaries.

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Table 1: Results of Partisan Index for Each of Four Plans in House and Senate

	House Plans				Senate Plans			
	Huffman 1st	Sykes 1st	Enacted	Sykes 3rd	Huffman 1st	Sykes 1st	Enacted	Sykes 3rd
Likely R Seats:	67	55	62	57	24	19	23	20
Expressed as % of seats	67.7	55.6	62.6	57.6	72.2	57.6	69.7	60.6
Likely D Seats:	32	44	37	42	9	14	10	13
Expressed as % of seats	32.3	44.4	37.4	42.4	27.3	42.4	30.3	39.4
Total:	99	99	99	99	33	33	33	33

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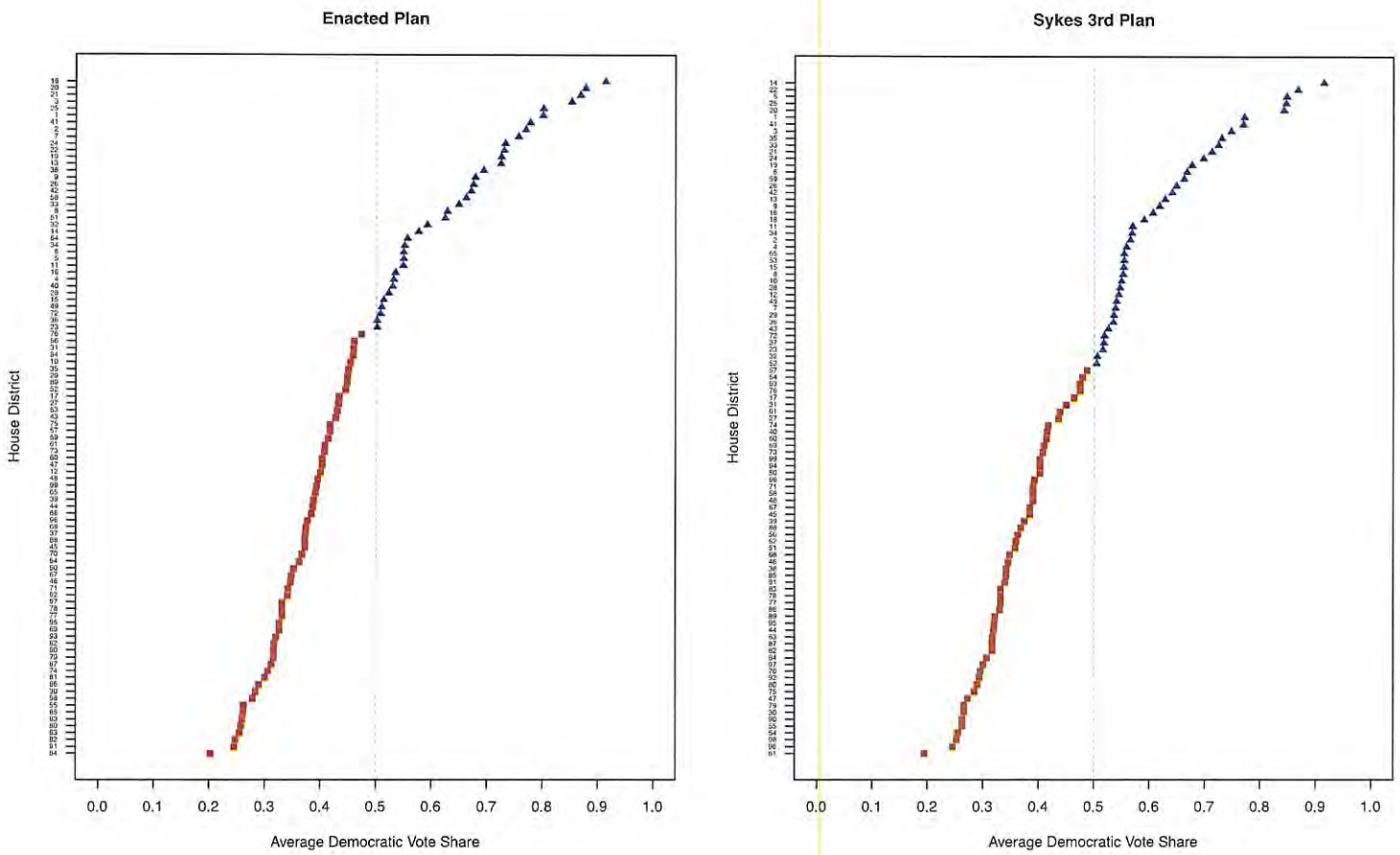

Figure 14: **House District Partisan Averages** - The figure shows the value of the partisan index for each House district in the Enacted Plan (left panel) and the Sykes 3rd Plan (right panel). Districts are ordered from least Democratic at the bottom to most Democratic at the top. Districts with a partisan index less than .50 are colored red and districts with a partisan index greater than .50 are colored blue. A vertical dashed line is placed at .50 in each panel for reference.

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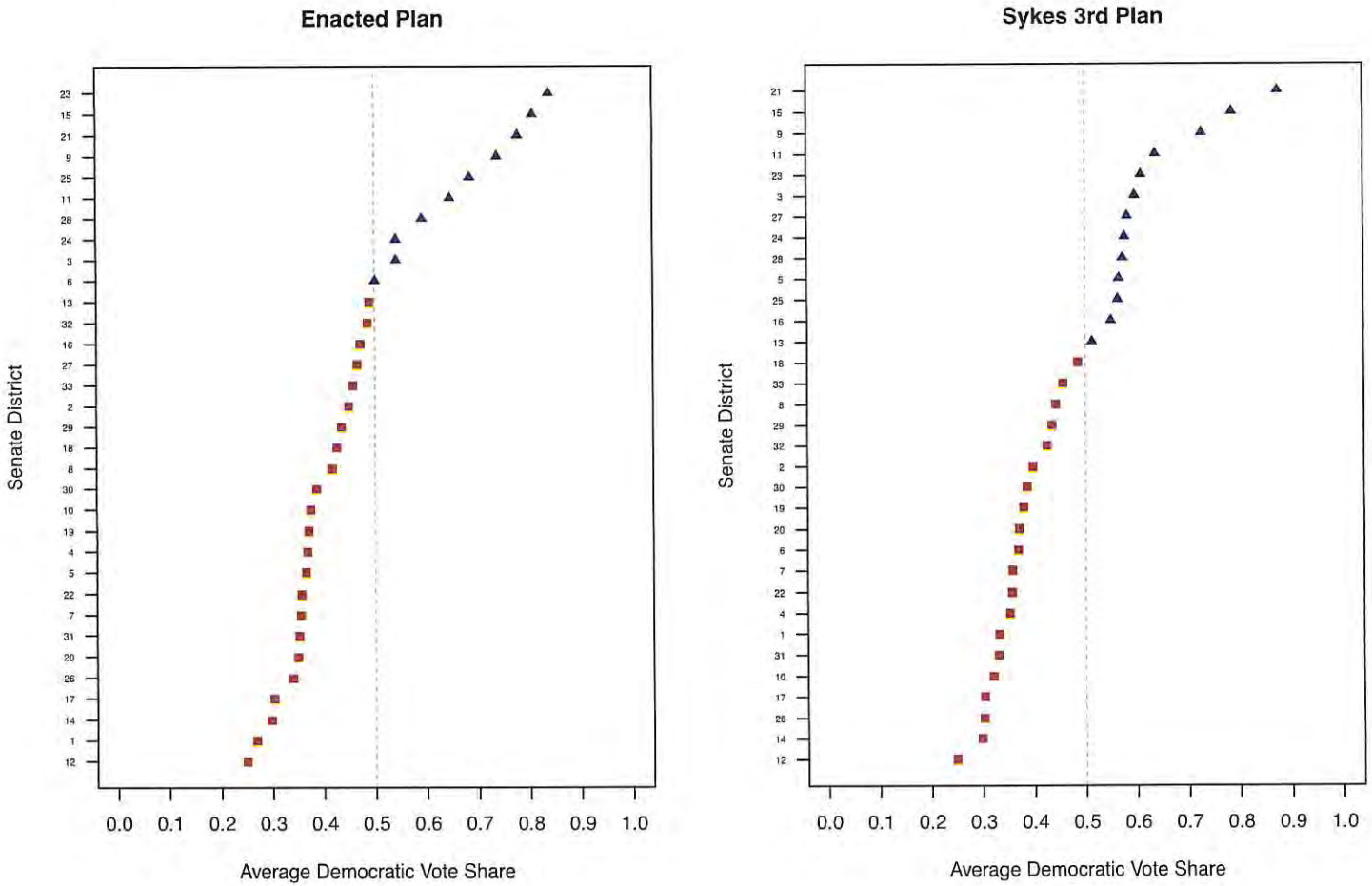

Figure 15: **Senate District Partisan Averages** - The figure shows the value of the partisan index for each Senate district in the Enacted Plan (left panel) and the Sykes 3rd Plan (right panel). Districts are ordered from least Democratic at the bottom to most Democratic at the top. Districts with a partisan index less than 0.50 are colored red and districts with a partisan index greater than 0.50 are colored blue. A vertical dashed line is placed at 0.50 in each panel for reference.

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7 How Do The Plans Compare on other Metrics?

In this section I compare the Enacted Plans to the Sykes 3rd Plans for both the House and the Senate. The metrics I choose are derived from statements in the Ohio Constitution regarding how districts should be drawn. Specifically I consider political boundary splits, compactness, and the treatment of incumbents as an indication of activities meant to benefit one party over the other.

Table 2: Comparison of Plans

	House Plans		Senate Plans	
	Enacted Plan	Sykes 3rd Plan	Enacted Plan	Sykes 3rd Plan
Boundary Splits:				
County Splits:	33	34	13	15
Average Compactness:				
Reock:	0.40	0.39	0.39	0.38
Polsby-Popper:	0.30	0.29	0.31	0.31
Convex Hull:	0.74	0.72	0.73	0.74
Incumbent 'Double-Bunking':				
Republican/Republican	0	10	6	10
Democrat/Democrat	0	0	0	0
Republican/Democrat	3/3	2/2	0	0

Boundary Splits:

Article XI Section 3 of the Ohio Constitution details the way in which county, municipality, and township boundaries are to be treated. The general idea of this section emphasizes that these pre-existing political boundaries should be split as few times as possible. I consider a county to be split in the same way that the Ohio Constitution states and Professor Rodden details in his report.[25] In short, if a county contains multiple districts but all of those districts are entirely within the county boundaries, it is not considered split (as is the case in Hamilton County, for example). If a district is partially in one county and contains the entirely of an adjacent county, the county with the "partial" district is considered split

[25] See Rodden report, para. 28

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while the adjacent whole county is not (District 12 contains a portion of Franklin County and the entirety of an adjacent county in both plans, for example. Thus, Franklin County would be considered split while the adjacent county would not.) Because counties do not always have a population equal to some multiple of the ideal district size, there will by necessity be some splits. Looking at Table 2 we see that in the House plans the Enacted Plan splits 33 counties while the Sykes Plan splits 34 counties. In the Senate plans the Enacted Plan splits 13 counties while the Sykes Plan splits 15 counties.

Compactness Measures:

Article XI Section 6(C) of the Ohio Constitution states that districts should be compact. To measure the compactness of the various plans I calculate three commonly used measures, the Reock Score, the Polsby-Popper Score, and the Convex Hull. In all three cases these computations measure compactness, albeit in slightly different ways. They are, however, highly correlated with one another. In all cases, higher numbers indicate more compact districts. Looking at the Enacted and Sykes Plans for the House, across all three measures the Enacted Plan is more compact on average than the Sykes Plan. In the Senate Plans the Enacted Plan is more compact using the Reock Score, the Sykes Plan is more compact using the Convex Hull and the two plans are equal on the Polsby-Popper measure of compactness.

Incumbent "Double-Bunking":

The final section of Table 2 looks at the rate of incumbent "double-bunking." Double-bunking is a colloquial term for the situation in which two incumbents who currently represent different districts are drawn into the same district in the new plan. If the two incumbents are of the same party, this then forces them to compete with one another in a primary election for the party's nomination. If the two incumbents are of a different party, this has the effect of forcing an incumbent to run in the general election against another incumbent. One of the most foundational and well established principles of American politics is that

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legislators are strategic and re-election motivated.[26] Placing two incumbents, particularly of the same party, into a new district and forcing them to compete with one another in a primary election is something they strongly dislike and try to avoid at all costs. Of course, pleasing incumbent legislators is not the job of the Redistricting Commission, but double-bunking legislators of the opposing party is a way to not only cause pain for your political rivals, but it also produces districts with no incumbent in the next election where candidates from your party will likely perform better due to the lack of any incumbency advantage. As such, it is a partisan tactic often used during redistricting and would indicate drawing boundaries with the intent to benefit a political party, something prohibited in Article XI, Section 6(A) of the Ohio Constitution. In the House, the Enacted Plan double-bunks six incumbent legislators — three Republican and three Democrats — all of whom are placed in a new district with an incumbent of the other party. The Sykes Plan double-bunks two Republicans and two Democrats in districts with the other party but also double-bunks five additional pairs of Republicans into districts with other Republican incumbents, for a total of fourteen double-bunked legislators. In the Senate the Enacted Plan double-bunks three pairs of Republicans in districts with other Republicans. The Sykes Plan places five pairs of Republican incumbents into districts with other Republicans for a total of ten double-bunked incumbents, all of whom are Republican. In summary, in both chambers the Sykes Plan double-bunks more than twice as many incumbents as the Enacted Plan, particularly Republican incumbents.

[26]For example, waiting to run for election when a district is open rather than facing a strong incumbent, or waiting for an incumbent's term limit if a state has term limits, or fundraising as a way to ward off potential challengers. Mayhew, David R. Congress: The electoral connection. Yale university press, 2004. Rogers, Steven. "Strategic challenger entry in a federal system: The role of economic and political conditions in state legislative competition." Legislative Studies Quarterly 40, no. 4 (2015): 539-570.

HC_0577

8 Where Do the Plans Differ?

As demonstrated above, in order to obtain a map more favorable to the Democratic Party, the Sykes Plan splits more counties and produces a slightly less compact map. This is in line with what would be necessary to overcome the natural disadvantage that Democrats face given the spatial geography and distribution of their voters discussed in earlier sections of this report. In order to create a more proportional statewide map, given the geographic clustering of Democratic voters in the urban centers of the state, the Sykes Plan must more efficiently distribute those voters across more districts and create more Democratic districts than the proportion of the population who lean Democratic in these counties.

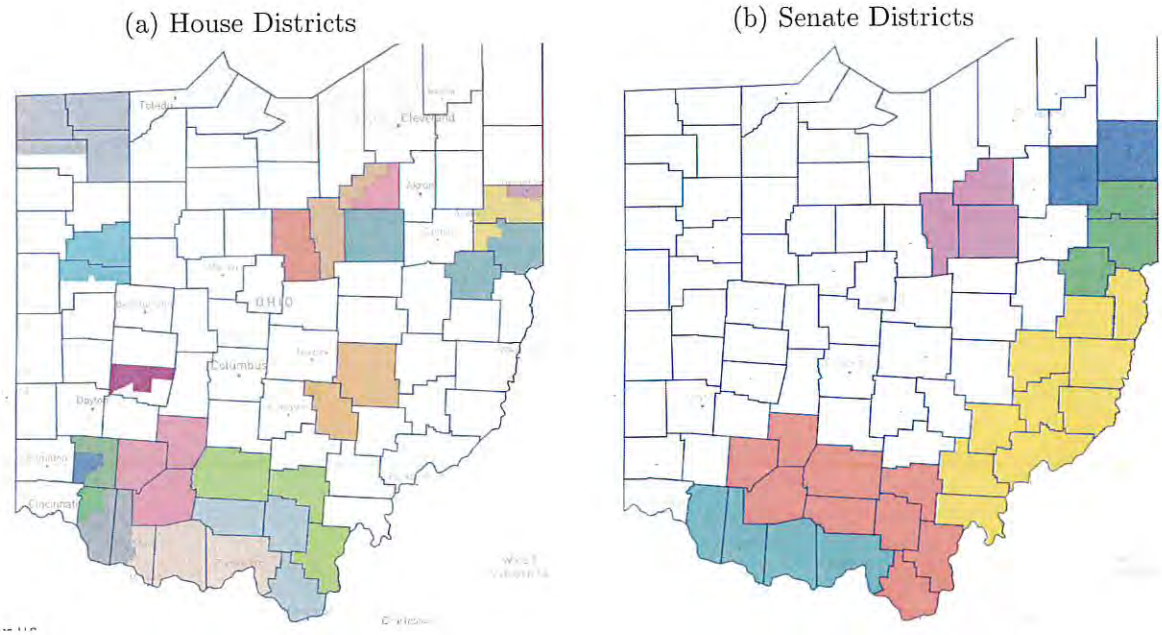

Figure 16: **Identical District Boundaries Across Enacted and Sykes 3rd Plans**

Because of this, the differences between the two plans (in terms of the likely partisanship of the House and Senate districts) are largely concentrated in the urban centers of the state. In fact, there is agreement in the partisan lean of the districts between the Enacted Plan and the Sykes Plan in many cases. There are 19 House districts and 6 Senate districts where the Enacted Plan and the Sykes Plan are in total agreement - i.e. they have

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the exact same district boundaries. Figure 16 show these districts for the House (left) and Senate (right). In these cases there is total agreement between the two plans.

Furthermore, in 83 of the 88 counties in Ohio, there is agreement between the Enacted Plan and the Sykes Plan on the likely partisanship (based on the 2016-2020 index of statewide election results discussed earlier) of representatives in House districts spanning these counties (even if there is not agreement on the exact boundaries of those districts, as in Figure 16 above). There is agreement between the two plans in 81 of the 88 counties in the state with regards to the likely partisanship of Senate districts that span these counties. These areas of agreement are shown below in green in Figure 17. Counties where there is disagreement between the plans with regards to the likely partisanship of Representatives (left panel) or Senators (right panel) in at least one district spanning these counties are colored red in Figure 17 below.

As the figure shows, the source of disagreement between the two House plans centers around the 27 districts that span these urban counties. However, there is not disagreement on the partisan lean of all 27 of the districts that span these counties. The disagreement is further isolated to five districts in the House. In the Senate plans there 10 districts that span the counties on which there is disagreement on the partisan lean of at least one district. not disagreement on the partisan lean of all 10 of the Senate districts that span these counties. The disagreement is isolated to three districts in the Senate where the Enacted Plan and the Sykes Plan disagree on the partisan lean of the district.

In the House plans there is disagreement over the likely partisanship of only five of the 27 districts that span five different counties (Franklin, Pickaway, Montgomery, Hamilton, and Lorain). Considering these five "disagreement counties" together, the counties collectively lean 57% D, 43% R using the partisan index discussed earlier. Looking at the 27 districts that span these counties reveals the different approaches taken by the different map drawers. In the Enacted Plan 17 districts lean Democratic (63%) and 10 districts lean Republican (37%). Thus, in these five counties the Enacted Plan produces a likely Democratic seat

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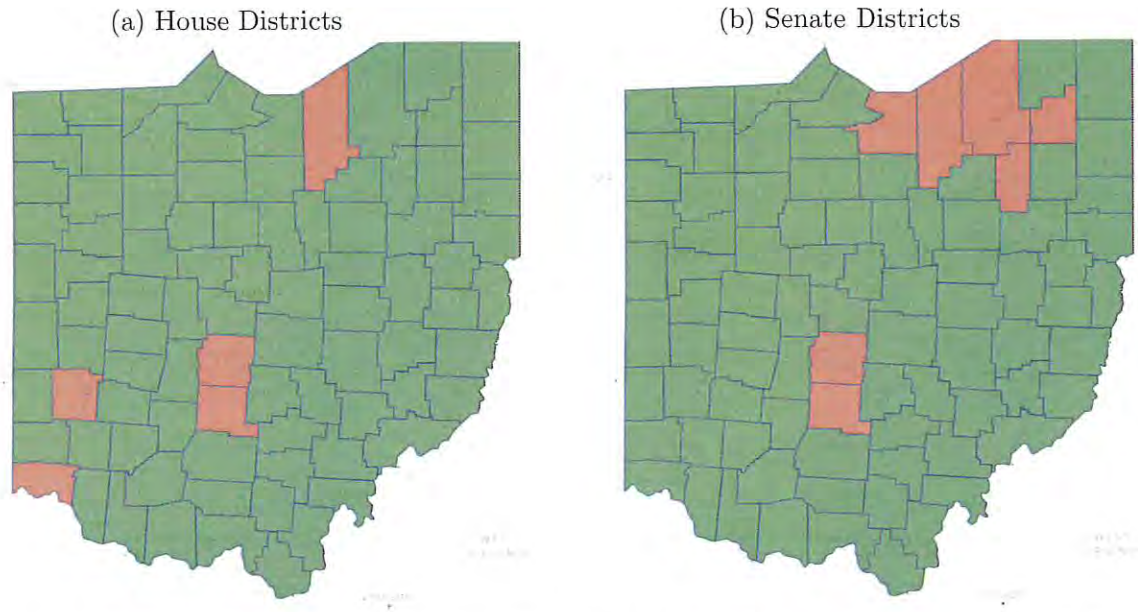

Figure 17: **Similarities Across Plans** - The green counties indicate locations where the Enacted Plan and the Sykes Plan agree on the partisan lean of districts in those counties. The red counties indicate locations where there is disagreement between the plans over the partisan lean of at least one district in that county.

share (63%) that is slightly higher than the corresponding Democratic vote share (57%) in these counties. In the Sykes Plan 22 districts (81%) lean Democratic and 5 districts (19%) lean Republican. Thus, in these five counties the Sykes Plan produces a likely Democratic seat share (81%) that is significantly higher than the corresponding Democratic vote share (57%) in these counties.

In the Senate plans there is disagreement over the likely partisanship of three of the ten districts that span seven different counties (Franklin, Pickaway, Cuyahoga, Summit, Geauga, Erie, and Lorain). Considering these seven "disagreement counties" together, they lean 61% D, 39% R using the partisan index discussed earlier. Looking at the ten Senate districts that span these counties reveals the different approaches taken by the different map drawers. In the Enacted Plan seven districts lean Democratic (70%) and three districts lean Republican (30%). Thus, in these seven counties the Enacted Plan produces a likely Democratic seat share (70%) that is higher than the corresponding Democratic vote share

HC_0580

(61%) in these counties. In the Sykes Plan all ten districts lean Democratic and 0 districts lean Republican. Thus, in these seven counties the Sykes Plan produces a likely Democratic seat share (100%) that is much higher than the corresponding Democratic vote share (61%) in these counties. As discussed earlier in this report, a map drawer that wants to create a map that is proportionate with statewide election results in Ohio needs to intentionally draw districts that over-represent Democrats in the urban counties of the state to make up for the natural geographic disadvantage that makes is difficult, if not impossible, to draw Democratic leaning districts in rural and exurban parts of the state.

What is the Cause of The Differences?

In the following sections I look at individual counties where the Enacted Plan and the Sykes Plan disagree on the likely partisanship of at least one district according to the 2016-2020 partisan index. I show the partisan lean of each district in each plan as well as maps to help visualize how decisions about where to place the district boundaries impacted the partisan lean of each district. I begin with the House districts and then consider the Senate.

9 House Plans:

9.1 Franklin & Pickaway Counties

Franklin County is the most populous county in Ohio. The 2020 Census population of the county was 1,323,807. This population divided by the ideal House district size produces 11.1 districts allocated to the county. The county's partisan lean is 63% D / 47% R. In both the Enacted Plan and the Sykes Plan Franklin County completely contains eleven districts with a twelfth district that incorporates a portion of Franklin County and the entirety of an adjacent county. In the Enacted Plan the adjacent county that is combined with portions of

HC_0581

Franklin County is Union County to the northwest. In the Sykes Plan the adjacent county that is combined with portions of Franklin County is Pickaway County to the south. Both Union and Pickaway Counties are sparsely populated and lean strongly Republican (see Table 3).

Columbus is the largest city in Franklin County. The 2020 Census population of Columbus was 905,748. This population divided by the ideal House district size produces 7.6 districts that could be drawn entirely within the Columbus city boundaries. This would leave 4.4 districts that do not reach into Columbus. Neither plan does this perfectly (partly because Columbus is a sprawling city with a very irregular shape), but the Enacted Plan does a better job of keeping Columbus whole. There are two districts (12 & 4) in which Columbus makes up 8% and 13% of the district population, respectively. The Sykes Plan has no districts that meet this criterion because it divides Columbus across more of the 12 districts in Franklin County. The district in the Sykes Plan that contains the smallest proportion of Columbus is District 11, where Columbus constitutes 22% of the population of that district. In other words, the Sykes Plan spreads the residents of Columbus (who are largely Democratic leaning) across more districts to build more districts that have a Democratic majority of voters.

A particularly clear example of this is in District 12 of the Sykes Plan. Because Franklin County does not have enough people to constitute 12 full districts, both plans must combine Franklin with an adjacent, rural county. However, the way in which each plan does so is very different. In the Sykes Plan, Franklin County is combined with Pickaway County to the south as District 12 (See Figures 36 and 38 for reference). Moving from south to north in this district, one starts with the entirety of Pickaway County, which leans strongly Republican. The district then reaches northward, takes in the city of Groveport, narrows dramatically and then widens again in central and eastern Columbus to scoop up a series of heavily Democratic precincts. This creates a district that leans Democratic (0.55 on the partisan index, see Table 3 below). It is hard to imagine any reason for this district to look

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the way it does other than to ensure a Democratic majority.

The Sykes Plan creates an additional Democratic leaning district by taking the majority Republican western, southwestern, and southern portions of Franklin County and diving these areas into three different districts that all include portions of central Columbus. Looking at the maps in Figures 36, 19 and 38, what is District 10 in the Enacted Plan is divided among Districts 7, 8, and 10 in the Sykes Plan, thus diluting the influence of Republican votes in this portion of Franklin County by splitting this area and combining it with the heavily Democratic portions of central Columbus.

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Table 3: Democratic Partisan Index for Districts in Franklin County

District Number:	District Democratic Partisan Index	
	Enacted Plan	Sykes 3rd Plan
1	0.80	0.77
2	0.77	0.57
3	0.85	0.75
4	0.53	0.56
5	0.55	0.85
6	0.55	0.67
7	0.76	0.54
8	0.63	0.55
9	0.68	0.62
10	0.45	0.55
11	0.55	0.57
12	0.40	0.55
proportion of districts that are Democratic leaning:	0.83	1.00
County:	County Democratic Partisan Index	
Franklin	0.63	0.63
Union	0.32	
Pickaway		0.30

Note: For each plan districts with a Democratic partisan index greater than 0.50 are colored blue and districts with a partisan index less than 0.50 are colored red. The Democratic seat share based on the partisan index is calculated below the districts for each plan. The county partisan vote shares are noted in the bottom portion of the table.

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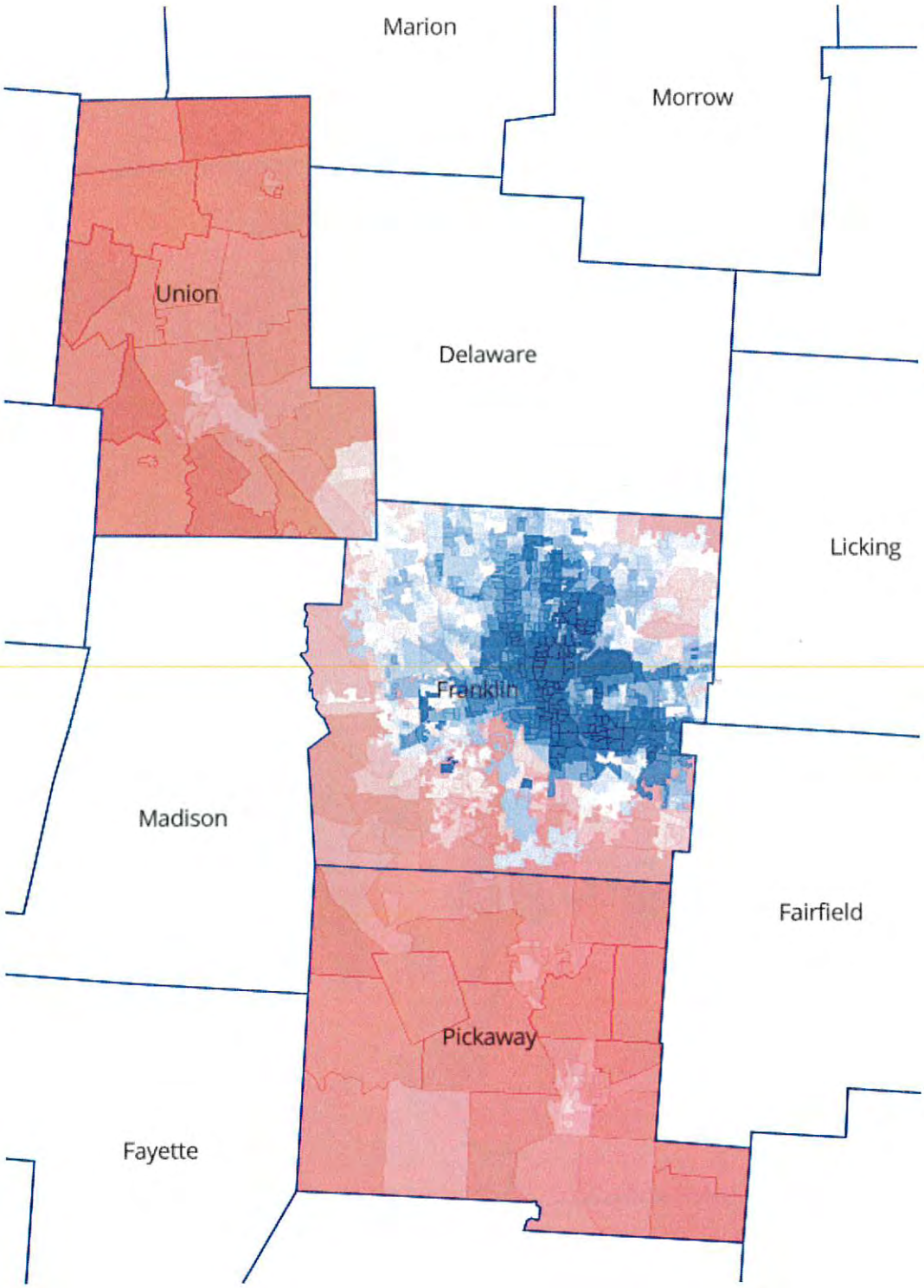

Figure 18: **Franklin, Butler, and Pickaway Counties -** The map colors show precinct level partisanship.

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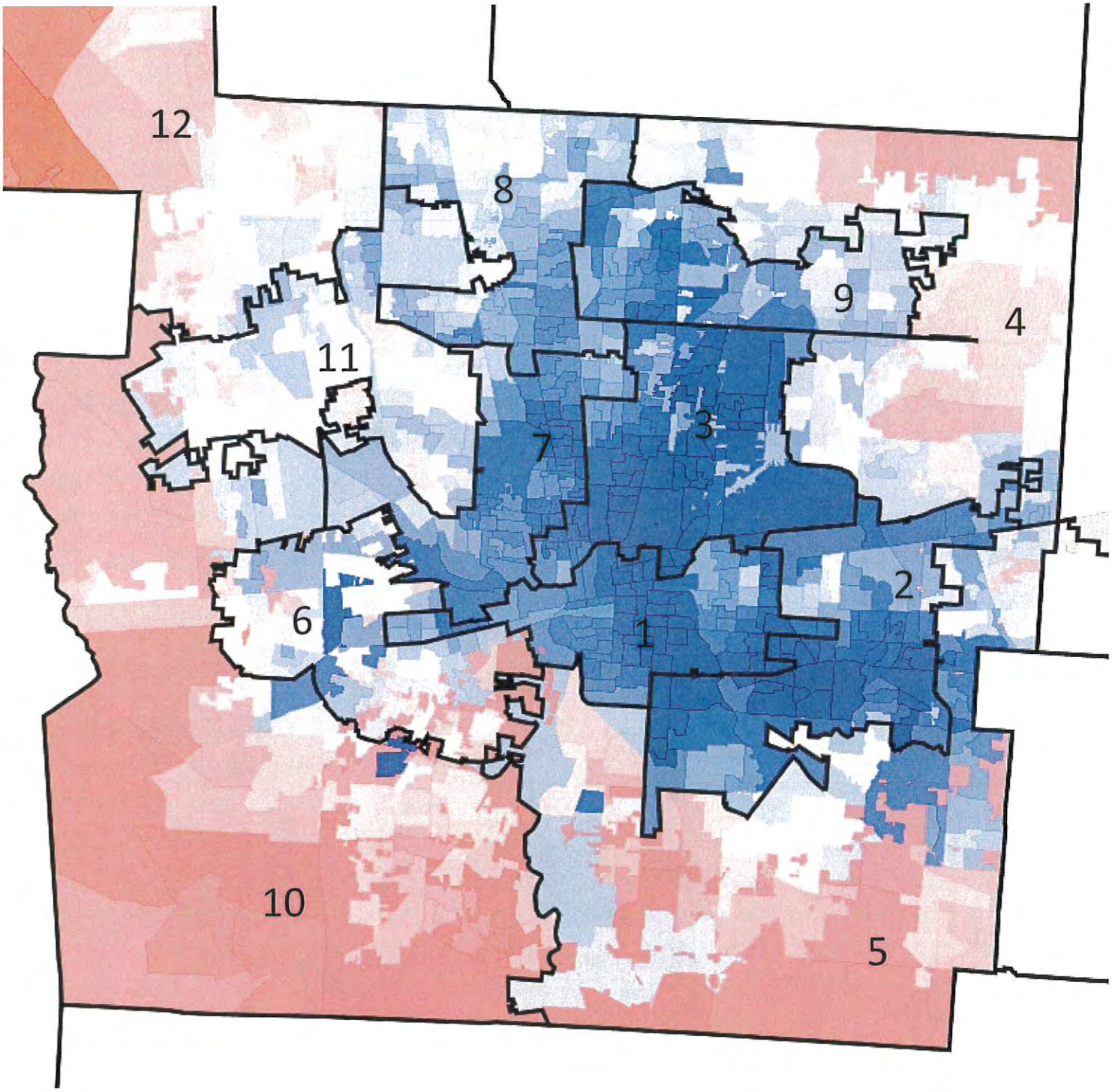

Figure 19: **Enacted Plan House Districts in Franklin County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number. District 12 extends further to the north east to incorporate all of Union County. However, not all of Union County is shown here to conserve space.

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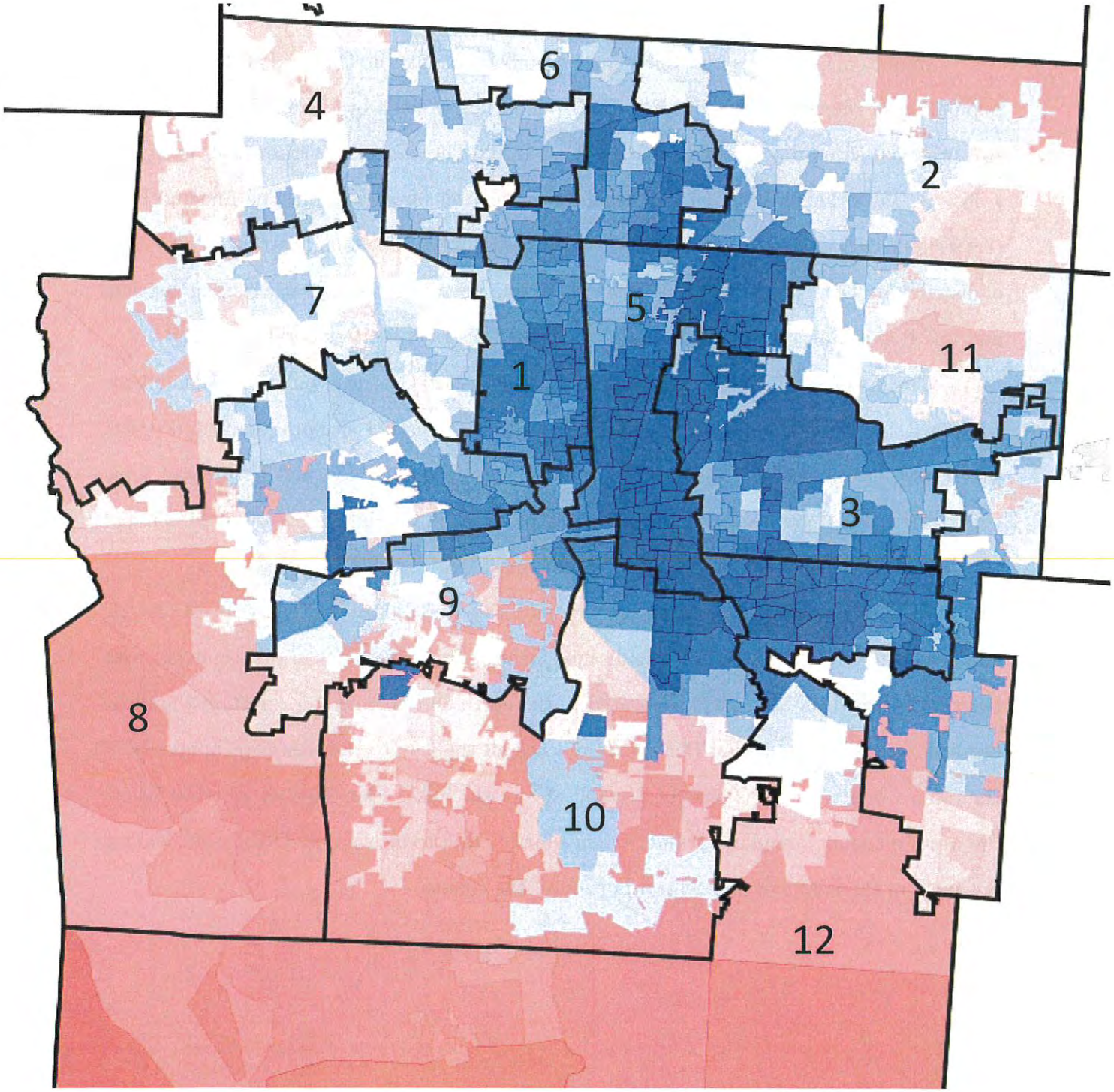

Figure 20: **Sykes 3rd Plan House Districts in Franklin County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number. District 12 extends further to the south to incorporate all of Pickaway County. However, not all of Pickaway County is shown here to conserve space.

HC_0587

9.2 Hamilton County

Hamilton County is the third most populous county in Ohio. The 2020 Census population of the county was 830,639. This population divided by the ideal House district size produces seven districts allocated to the county. The county's partisan lean is 55% D / 45% R. Table 4 shows the partisan lean of each district for each plan. The Enacted Plan creates four Democratic leaning districts and three Republican leaning districts (4/7 = 57% of districts are Democratic leaning). The Sykes Plan creates five Democratic leaning districts and two Republican leaning districts (5/7 = 71% of districts are Democratic leaning).

Cincinnati is the largest city in the county. The 2020 Census population of Cincinnati was 309,317. This population divided by the ideal House district size produces 2.6 districts that could be drawn entirely within the Cincinnati city boundaries, and both plans draw three districts that are nearly entirely made up of voters in Cincinnati (Districts 24, 25, and 26). This would leave four districts that do not reach into Cincinnati.

In both plans Districts 27 and 30 are majority Republican and Districts 24, 25, 26, and 28 are majority Democratic. The disagreement between the plans in this county is with District 29, which in both plans is located in the north and northwestern portion Hamilton County. In the Enacted Plan District 29 reaches all the way to the westward boundary of Hamilton County, which is heavily Republican. In the Sykes Plan District 29 stops before the western county boundary. It then extends further east to incorporate Democratic leaning precincts in the northern and central portion of the county.

HC_0588

Table 4: Democratic Partisan Index for Districts in Hamilton County

District Number:	District Democratic Partisan Index	
	Enacted Plan	Sykes 3rd Plan
24	0.73	0.70
25	0.80	0.85
26	0.68	0.65
27	0.43	0.44
28	0.52	0.55
29	0.45	0.54
30	0.28	0.27
proportion of districts that are Democratic leaning:	0.57	0.71

County:	County Democratic Partisan Index
Hamilton	0.55

Note: For each plan districts with a Democratic partisan index greater than 0.50 are colored blue and districts with a partisan index less than 0.50 are colored red. The Democratic seat share based on the partisan index is calculated below the districts for each plan. The county partisan vote shares are noted in the bottom portion of the table.

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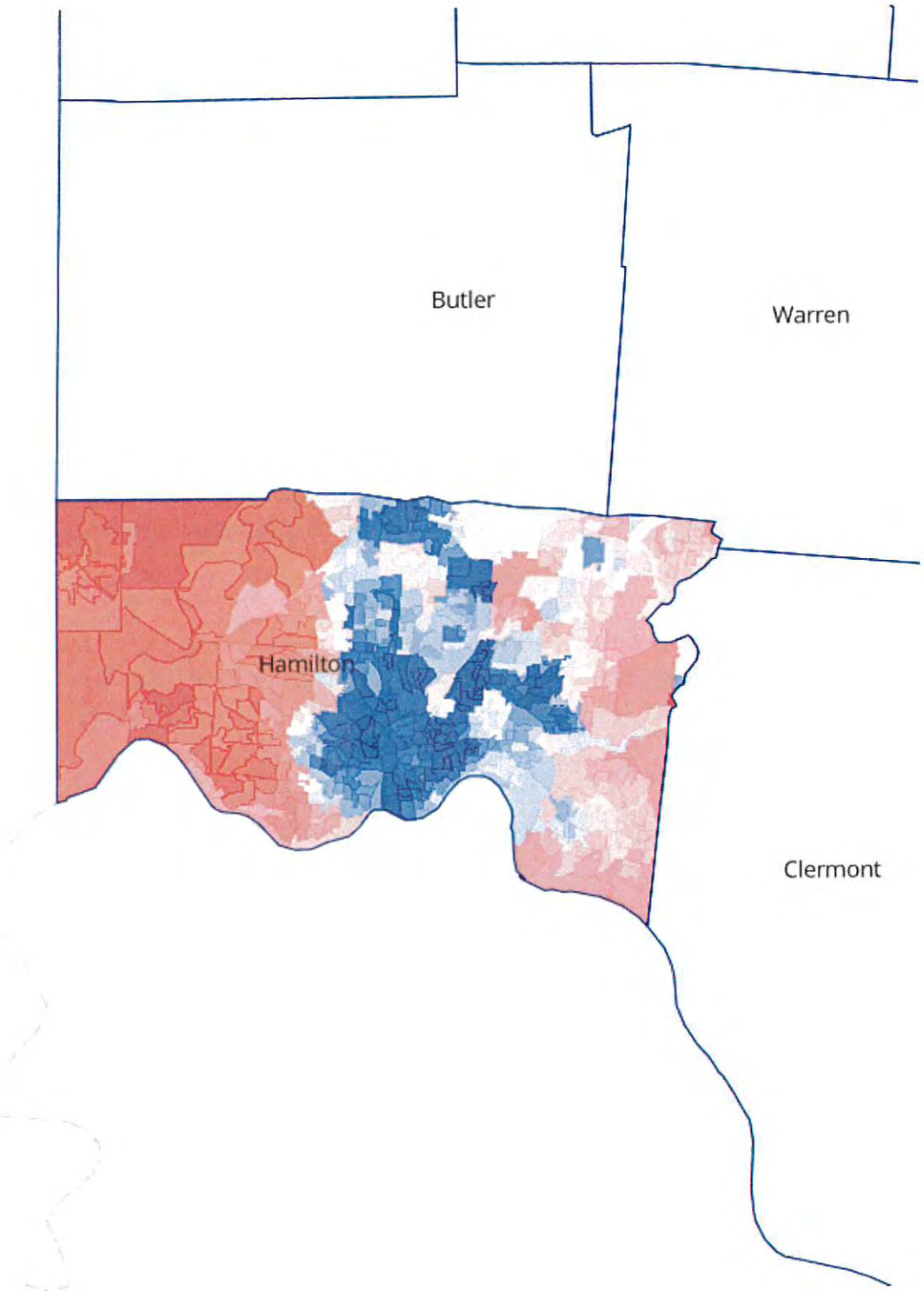

Figure 21: **Hamilton County -** The map colors show precinct level partisanship.

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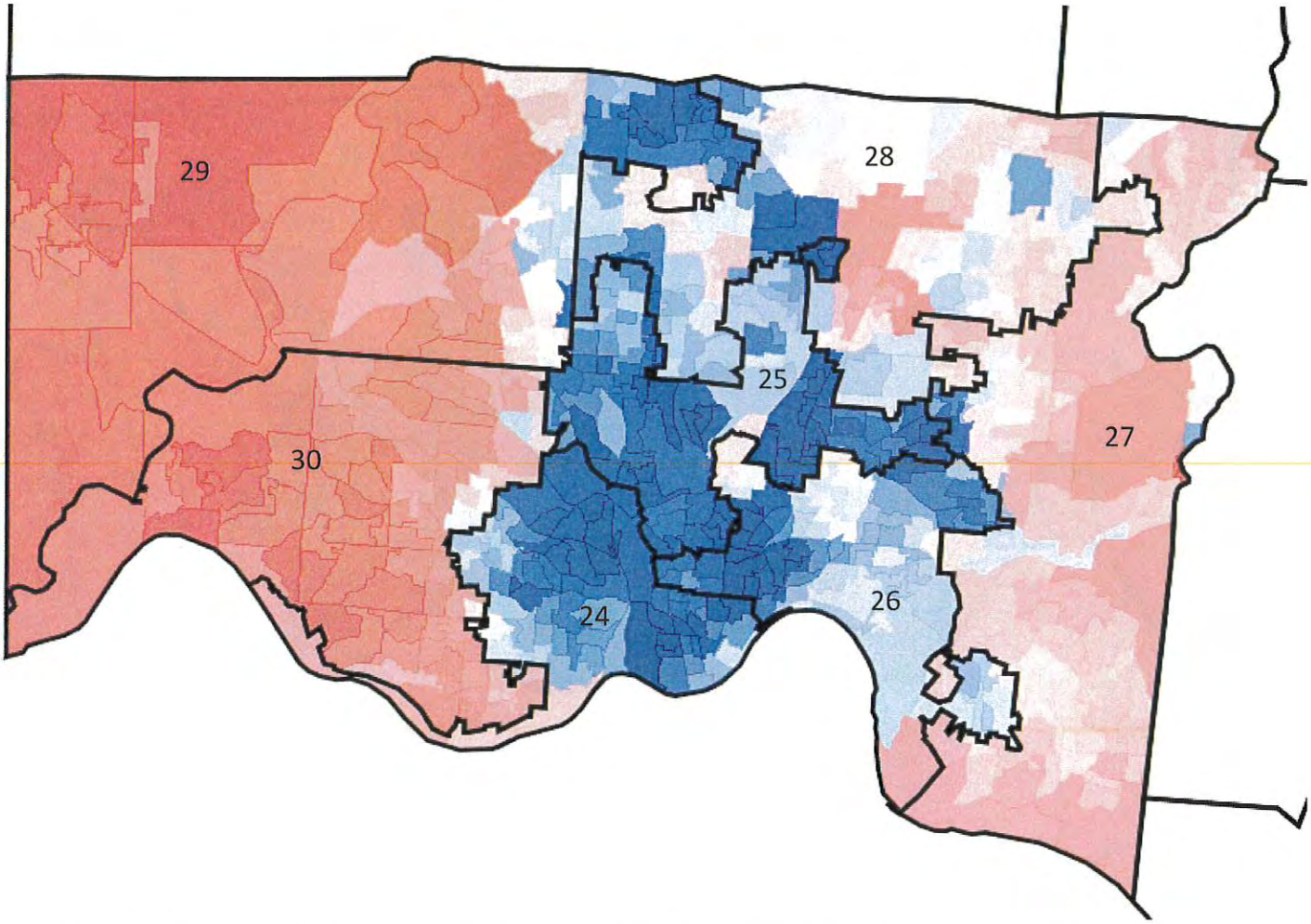

Figure 22: **Enacted Plan House Districts in Hamilton County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number.

HC_0591

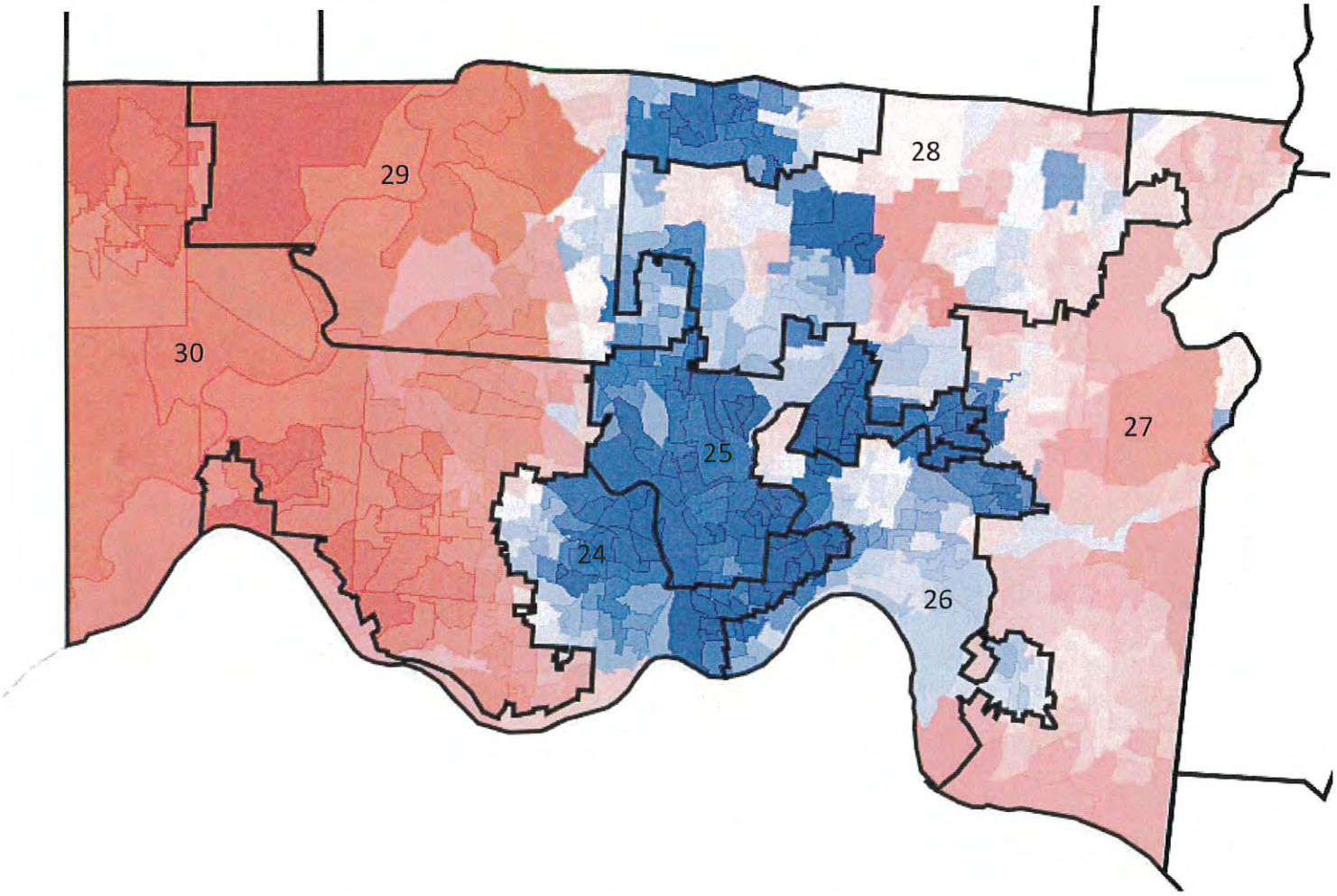

Figure 23: **Sykes 3rd Plan House Districts in Hamilton County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number.

HC_0592

9.3 Montgomery County

Montgomery County is the fifth most populous county in Ohio. The 2020 Census population of the county was 537,309. This population divided by the ideal House district size produces 4.5 districts allocated to the county. Because of the fraction of a district, both plans create four districts entirely within Montgomery county and a fifth district that is half in Montgomery County and half in adjacent counties. This split district in the Enacted Plan is District 39, which incorporates the western side of the county as well as the entirety of Preble County to the west and a portion of Butler County to the southwest. The split district in the Sykes Plan is also District 39, which incorporates the southeastern corner of Montgomery County as well as the southwestern portion of Greene County.

The county's partisan lean is evenly split at 50% D / 50% R. However, when incorporating the portions of either Preble or Greene Counties, which are included in District 39 of each plan, the partisan balance of the counties leans slightly Republican (52% R when including Preble and 52% R when including Greene). Table 5 shows the partisan lean of each district for each plan. Because there are five districts allocated to Montgomery County and the county has a nearly even partisan split, it would not be possible for any plan to draw districts whose partisan index matched the exact proportion to the county partisanship here (i.e. 50% of 5 would be 2.5 districts).

Dayton is the largest city in the county. The 2020 Census population of Dayton was 137,644. This population divided by the ideal House district size produces 1.2 districts that could be drawn entirely within the Dayton city boundaries, and both plans draw one districts that is nearly entirely made up of voters in Dayton (District 38 in the Enacted Plan and District 35 in the Sykes Plan). This would leave 4.5 districts that mostly do not reach into Dayton.

In both plans, the district that is split between Montgomery County and an adjacent county is majority Republican (District 39). In the remaining four districts that are entirely contained within Montgomery County, the Enacted Plan creates two Democratic leaning

HC_0593

districts (Districts 36 and 38) and two Republican leaning districts (Districts 35 and 37). The Sykes Plan creates three Democratic leaning districts (Districts 35, 36 and 37) and one Republican leaning districts (Districts 38).

HC_0594

Table 5: Democratic Partisan Index for Districts in Montgomery County

District Number:	District Democratic Partisan Index	
	Enacted Plan	Sykes 3rd Plan
35	0.45	0.73
36	0.502	0.54
37	0.37	0.52
38	0.69	0.34
39	0.39	0.38
proportion of districts that are Democratic leaning:	0.40	0.60
County:	County Democratic Partisan Index	
Montgomery	0.50	0.50
Preble	0.23	
Greene		0.37
Montgomery + Preble	0.48	
Montgomery + Greene		0.48

Note: For each plan districts with a Democratic partisan index greater than 0.50 are colored blue and districts with a partisan index less than 0.50 are colored red. The Democratic seat share based on the partisan index is calculated below the districts for each plan. The county partisan vote shares are noted in the bottom portion of the table.

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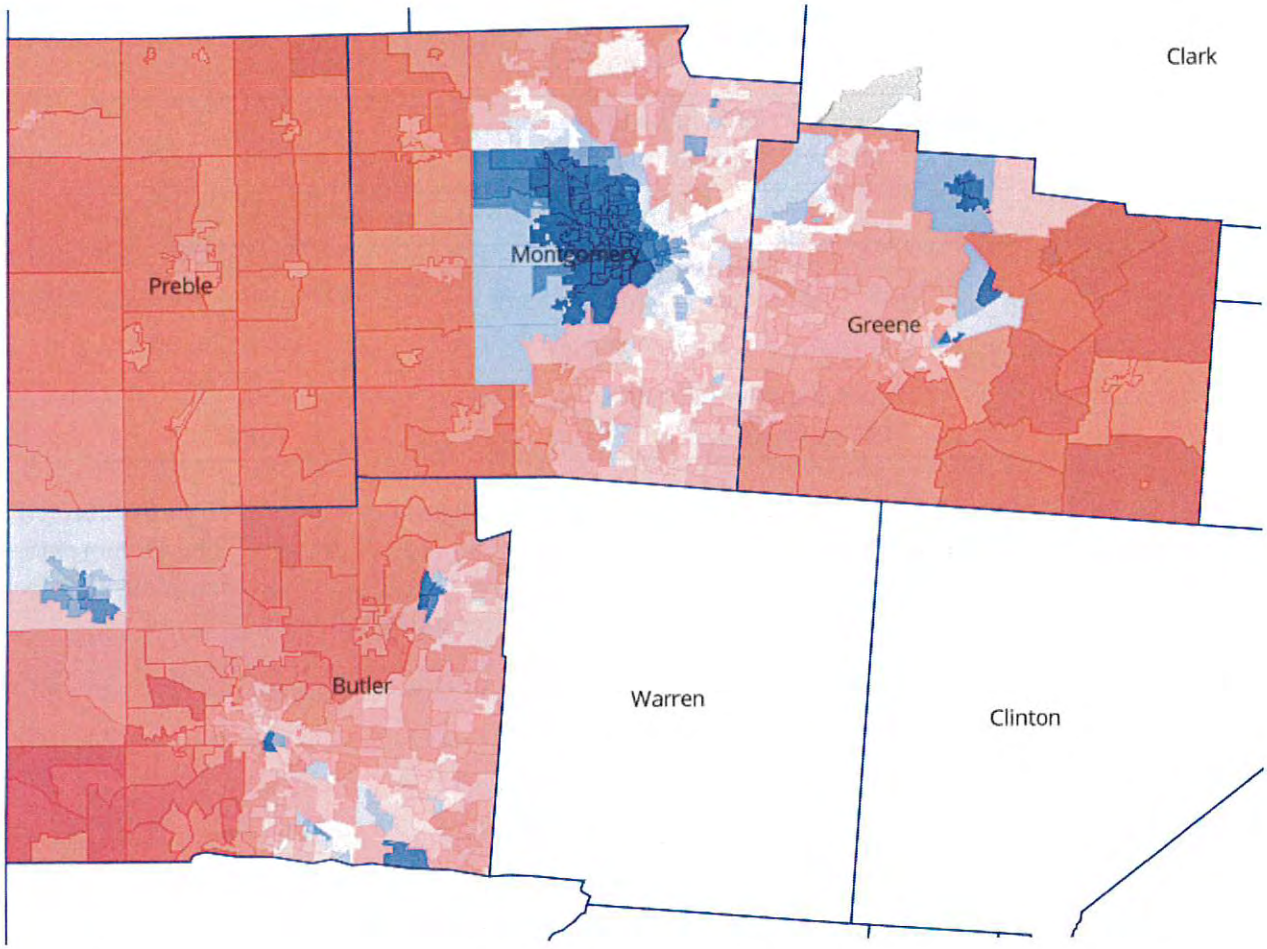

Figure 24: **Montgomery, Preble, Greene, and Butler Counties -** The map colors show precinct level partisanship.

HC_0596

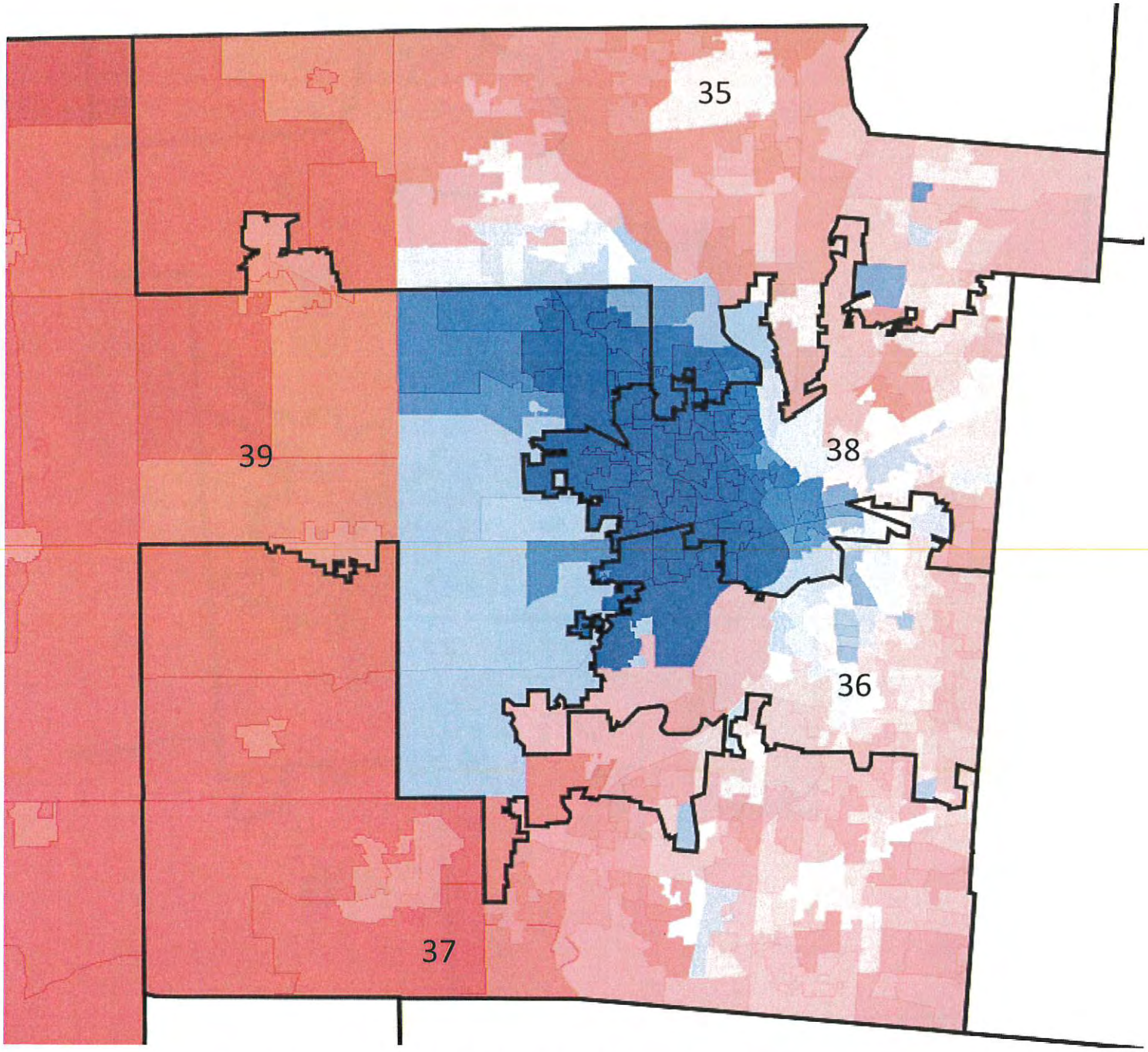

Figure 25: **Enacted Plan House Districts in Montgomery County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number. District 39 extends further to the west to incorporate all of Preble County and a small portion of Butler County. However, not all of Preble and Butler Counties are shown here to conserve space.

HC_0597

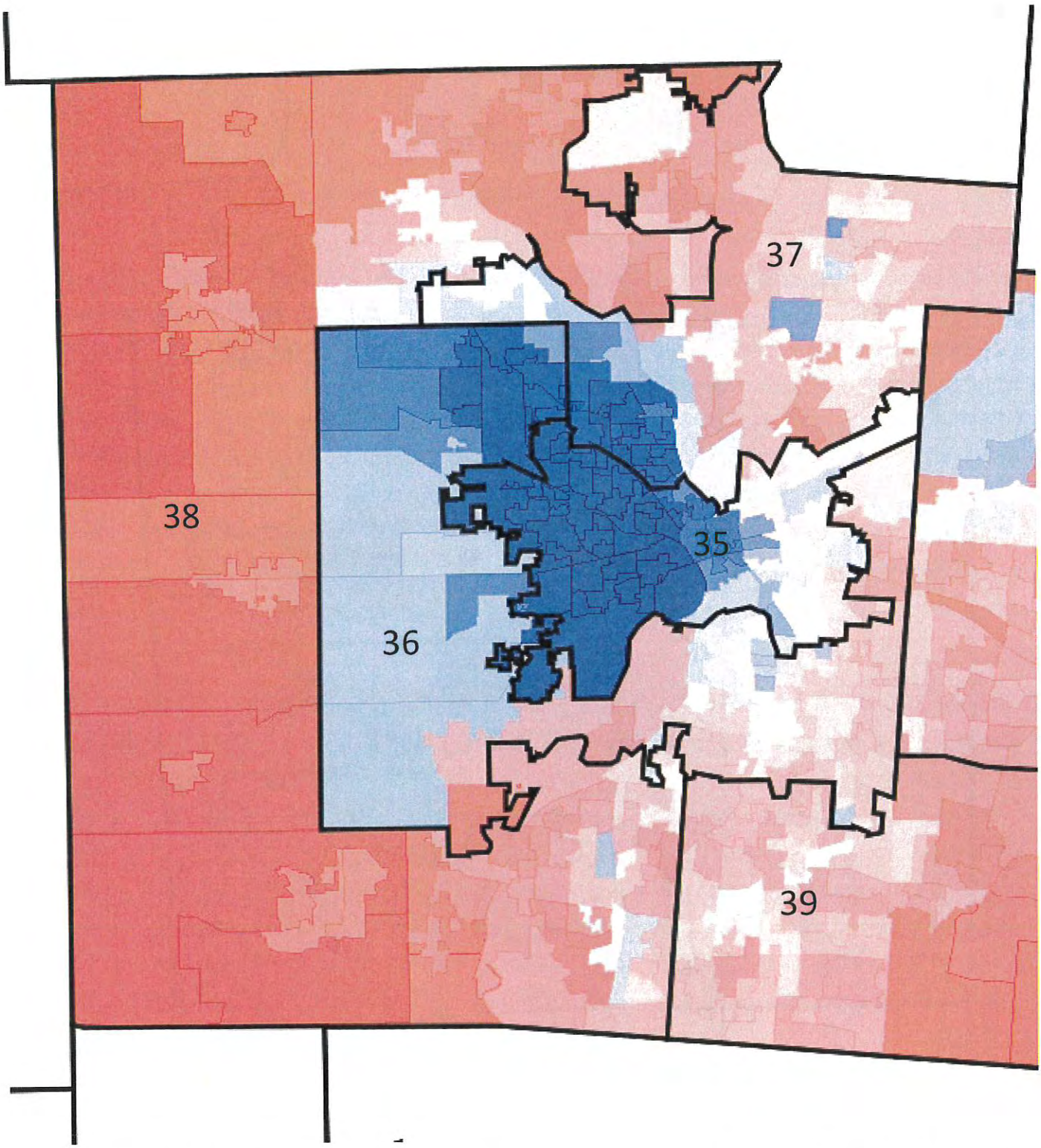

Figure 26: **Sykes 3rd Plan House Districts in Montgomery County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number. District 39 extends further to the east to incorporate much of Greene County. However, not all of Greene County is shown here to conserve space.

HC_0598

9.4 Lorain County

The 2020 Census population of Lorain County (312,964), divided by the district ideal population (119,186) means that the county's population is large enough to contain 2.6 districts. Because of the fraction of a district, both plans create two districts entirely within Lorain county and a third district that is half in Lorain County and half in adjacent counties. This split district in the Enacted Plan is District 53, which incorporates the southwestern portion of Lorain County as well as the entirety of Huron County to the southwest. The split district in the Sykes Plan is District 54, which incorporates the southern portion of Lorain County as well as the western portion of Erie County.

An important difference between the two plans is that in this case the Enacted Plan creates the third district (District 53) without creating any additional county splits. This is because District 53 contains the entirety of Huron County. The Sykes Plan creates an additional county split in District 54 by only taking in a portion of Erie County, since Erie County has a population that is too large to allow it to be entirely contained in District 54.

Lorain County's partisan lean is slightly Democratic at 52% D / 48% R. However, when incorporating the adjacent counties (Huron for the Enacted Plan and Erie for the Sykes Plan) that are included in these districts the counties collectively are nearly evenly split (0.49 for Lorain + Huron, 0.51 for Lorain + Erie, see Table 6 below). The partisan lean of each district for each plan is shown in Table 6. In both plans, the district that is partially in Lorain County and an adjacent, more Republican leaning county is majority Republican (District 53 in the Enacted Plan and District 54 in the Sykes Plan). In the remaining two districts that are entirely contained within Lorain County, the Enacted Plan creates one Democratic leaning District (Districts 51) and one Republican leaning District (Districts 52). The Sykes Plan creates two Democratic leaning Districts (Districts 52 and 53) and no Republican leaning Districts.

HC_0599

Table 6: Democratic Partisan Index for Districts in Lorain County

District Number:	District Democratic Partisan Index	
	Enacted Plan	Sykes 3rd Plan
51	0.63	
52	0.45	0.51
53	0.43	0.56
54		0.48
proportion of districts that are Democratic leaning:	0.33	0.67
County:	County Democratic Partisan Index	
Lorain	0.52	0.52
Huron	0.34	
Erie		0.47
Lorain + Huron	0.49	
Lorain + Erie		0.51

Note: For each plan districts with a Democratic partisan index greater than 0.50 are colored blue and districts with a partisan index less than 0.50 are colored red. The Democratic seat share based on the partisan index is calculated below the districts for each plan. The county partisan vote shares are noted in the bottom portion of the table. In Lorain County both plans contain three districts, but the numbering of the districts differs. The Enacted Plan numbers them Districts 51, 52, and 53. The Sykes Plan numbers them Districts 52, 53, 54.

HC_0600

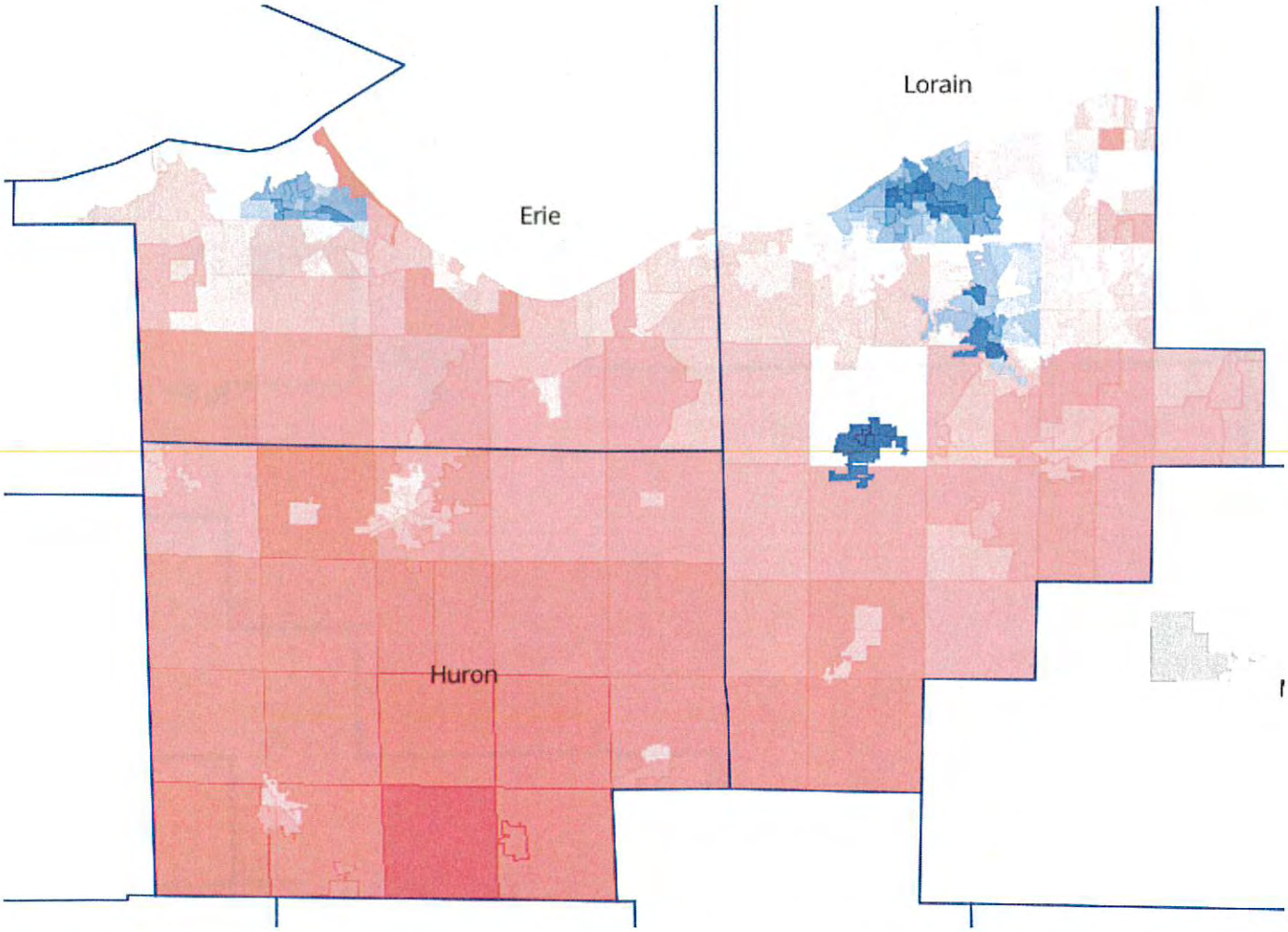

Figure 27: **Lorain, Huron, and Erie Counties -** The map colors show precinct level partisanship.

HC_0601

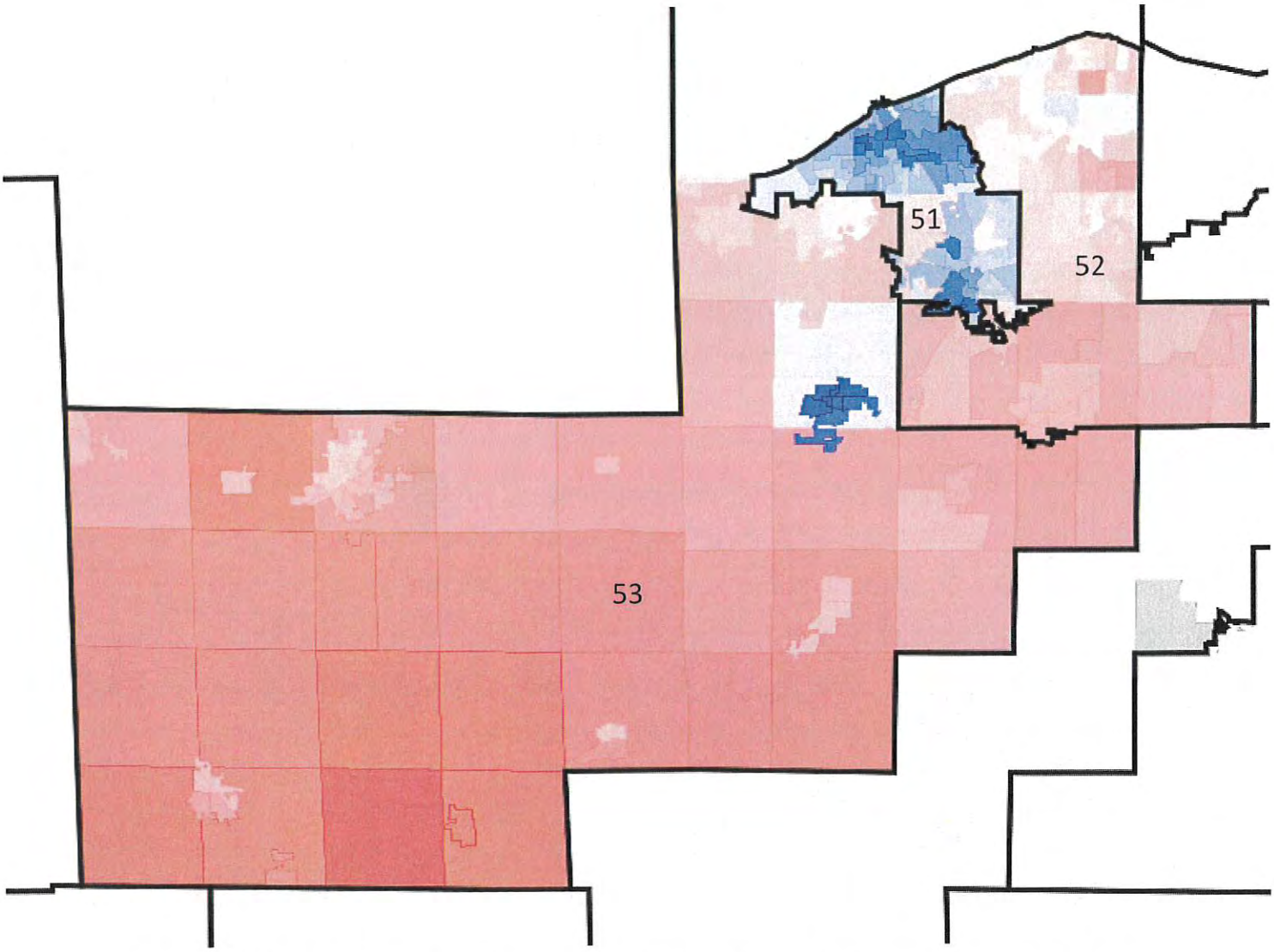

Figure 28: **Enacted Plan House Districts in Lorain County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number. District 53 contains the south western portion of Lorain County and all of Huron County.

HC_0602

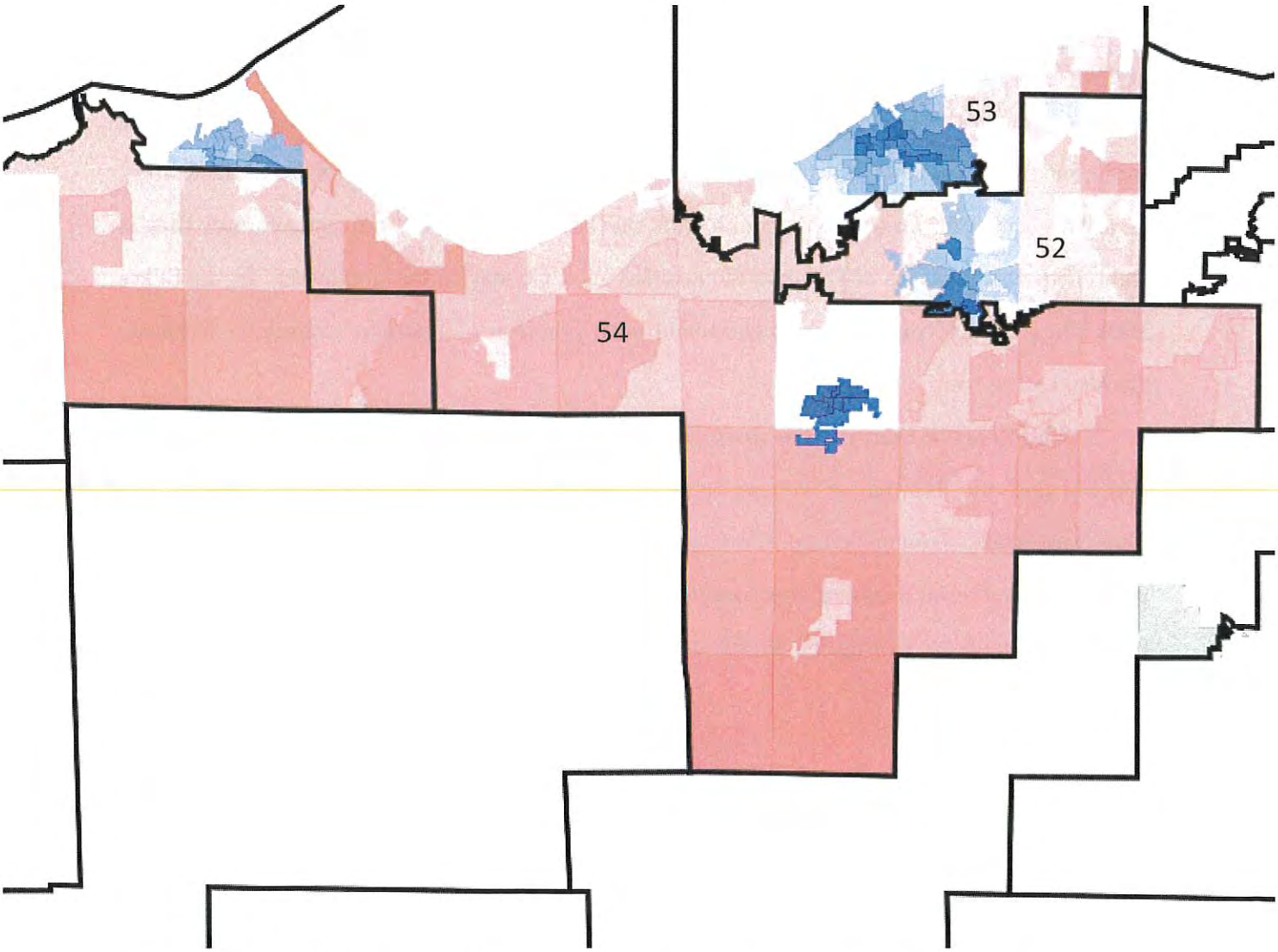

Figure 29: **Sykes 3rd Plan House Districts in Lorain County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number. District 54 contains the southern portion of Lorain County and the eastern half of Erie County.

HC_0603

10 Senate Plans:

10.1 Franklin & Pickaway Counties

The 2020 Census population of Franklin county was 1,323,807. This population divided by the ideal Senate district size (357,559) produces 3.7 Senate districts allocated to the county. In both the Enacted Plan and the Sykes Plan Franklin County completely contains three Senate districts with a fouth district that incorporates a portion of Franklin County and the entirety of an adjacent county. In the Enacted Plan the adjacent county that is combined with portions of Franklin County is Union County to the northwest. In the Sykes Plan the adjacent county that is combined with portions of Franklin County is Pickaway County to the south.

The Enacted Plan creates three Democratic leaning Senate districts (Districts 3, 15, and 25) and one Republican leaning Senate District (District 16). The Sykes Plan creates four Democratic leaning Senate districts and no Republican leaning Senate districts. The partisan lean of each Senate district is shown in Table 7, and maps of the county and district boundaries in shown in Figures 30, 31, and 32.

HC_0604

Table 7: Democratic Partisan Index for Districts in Franklin County

	District Democratic Partisan Index	
District Number:	Enacted Plan	Sykes 3rd Plan
3	0.54	0.60
5		0.57
15	0.81	0.79
16	0.47	0.55
25	0.69	
proportion of districts that are Democratic leaning:	0.75	1.00
County:	County Democratic Partisan Index	
Franklin	0.63	
Union	0.32	
Pickaway		0.30

Note: For each plan districts with a Democratic partisan index greater than 0.50 are colored blue and districts with a partisan index less than 0.50 are colored red. The Democratic seat share based on the partisan index is calculated below the districts for each plan. The county partisan vote shares are noted in the bottom portion of the table. In Franklin County both plans contain four Senate districts, but the numbering of the districts differs. The Enacted Plan numbers them Districts 3, 15, 16, and 25. The Sykes Plan numbers them Districts 3, 5, 15, and 16.

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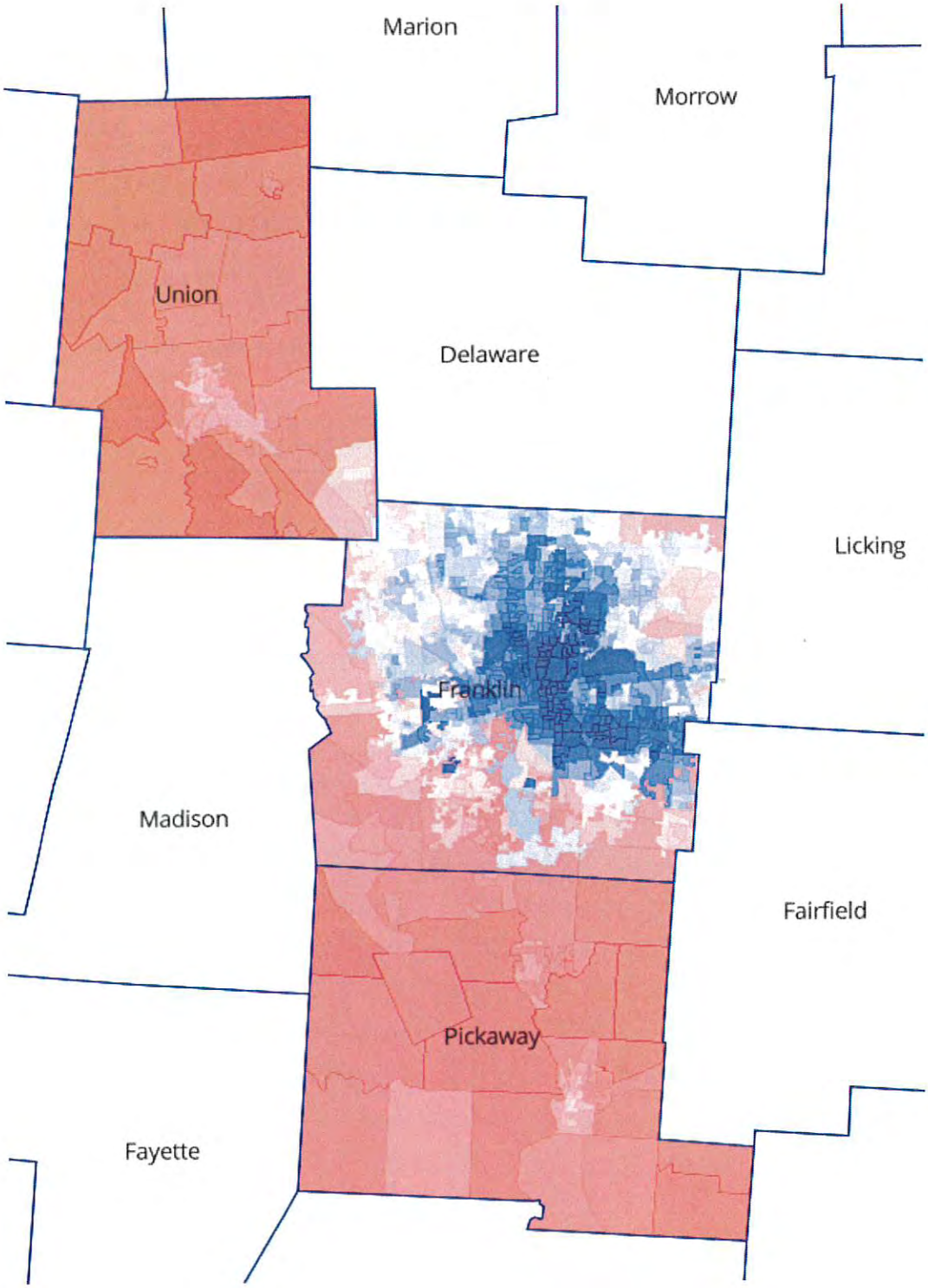

Figure 30: **Franklin, Butler, and Pickaway Counties -** The map colors show precinct level partisanship.

HC_0606

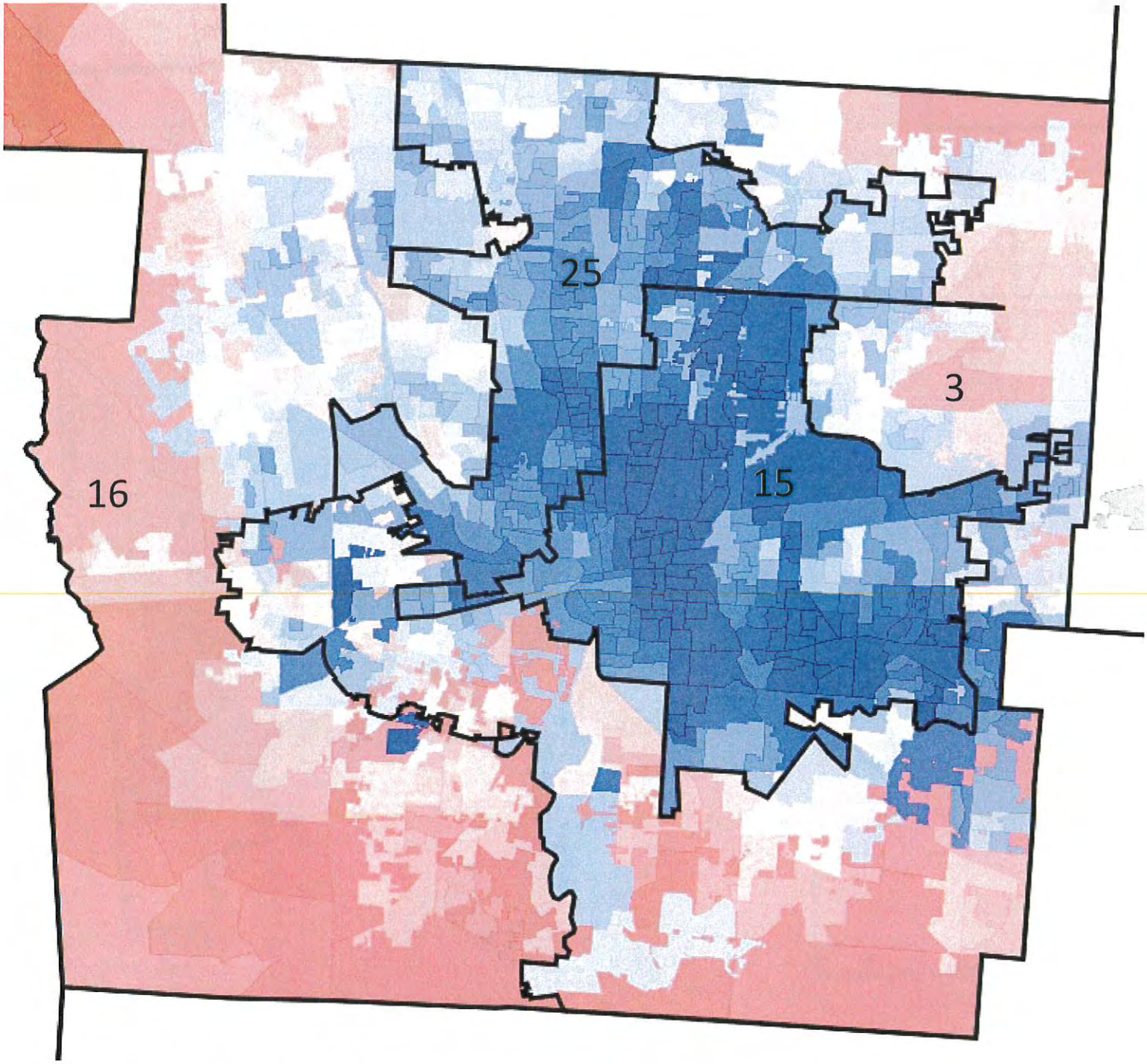

Figure 31: **Enacted Plan Senate Districts in Franklin County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number. District 16 extends further to the north east to incorporate all of Butler County. However, not all of Butler County is shown here to conserve space.

HC_0607

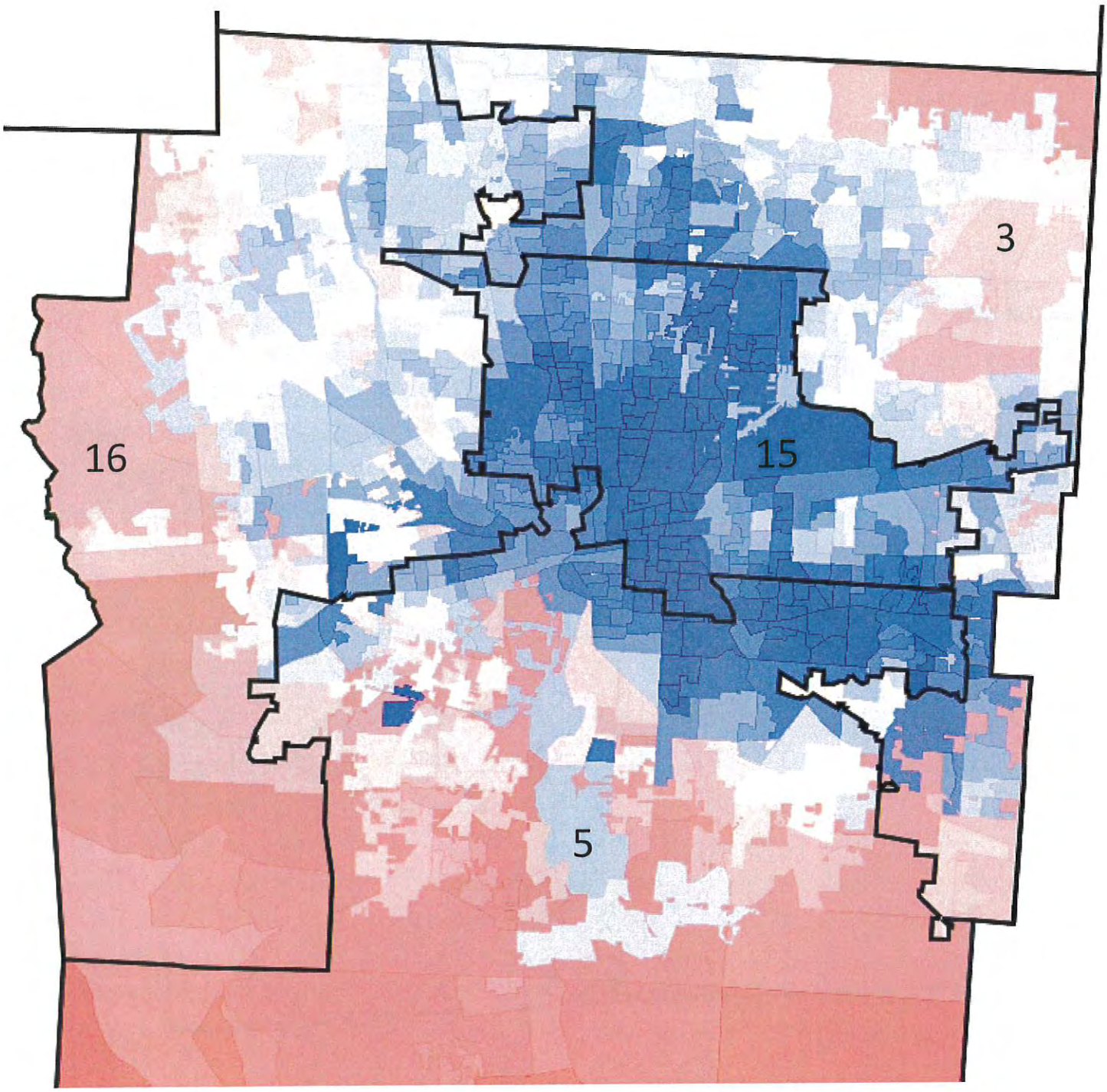

Figure 32: **Sykes 3rd Plan Senate Districts in Franklin County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number. District 5 extends further to the south to incorporate all of Pickaway County. However, not all of Pickaway County is shown here to conserve space.

HC_0608

10.2 Cuyahoga & Summit Counties

In this section I consider Senate districts in Cuyahoga and Summit counties together because the counties are adjacent to one another and the Senate districts in each plan span the two counties.

Cuyahoga County is the second most populous county in Ohio. The 2020 Census population of the county was 1,264,817. Summit County is the fourth most population county in Ohio. The 2020 Census population of Summit County was 540,428. Together, the population of both counties divided by the ideal Senate district size produces 5.0 districts allocated to the county. Cuyahoga county's partisan lean is 68% D / 32% R. Summit County's partisan lean is 55% D / 45% R. Both plans also incorporate a portion of neighboring Geauga County into one Senate district. The partisan lean of Cuyahoga, Summit and Geauga counties together is 63% D / 47% R.

A map of the counties and the spatial distribution of voters in the counties is shown in Figure 33. The map shows strong clusters of Democratic voters in Cleveland (and surrounding suburbs) and Akron, with majority Republican precincts surrounding these two cities.

The Enacted Plan creates four Democratic leaning Senate districts (Districts 21, 23, and 24 in the Cleveland area and District 28 in Akron) and one Republican leaning Senate District (District 25) in the western and northern suburbs of Summit County, southern portions of Cuyahoga County, and neighboring Geauga County to the east. The Sykes Plan creates five Democratic leaning Senate districts and no Republican leaning Senate districts. The partisan lean of each Senate district is shown in Table 8, and maps of the counties and district boundaries in shown in Figures 33, 34, and 35.

HC_0609

Table 8: Democratic Partisan Index for Districts in Cuyahoga & Summit Counties

District Number:	District Democratic Partisan Index	
	Enacted Plan	Sykes 3rd Plan
21	0.78	0.88
23	0.84	0.61
24	0.52	0.58
28	0.59	0.57
25		0.56
27	0.47	
proportion of districts that are Democratic leaning:	0.80	1.0

County:	County Democratic Partisan Index
Cuyahoga	0.68
Summit	0.55
Geauga	0.38
Cuyahoga + Summit + Geauga	0.63

Note: For each plan districts with a Democratic partisan index greater than 0.50 are colored blue and districts with a partisan index less than 0.50 are colored red. The Democratic seat share based on the partisan index is calculated below the districts for each plan. The county partisan vote shares are noted in the bottom portion of the table. In Cuyahoga and Summit Counties both plans contain four Senate districts, but the numbering of the districts differs. The Enacted Plan numbers them Districts 21, 23, 24, 27, and 28. The Sykes Plan numbers them Districts 21, 23, 24, 25, and 28.

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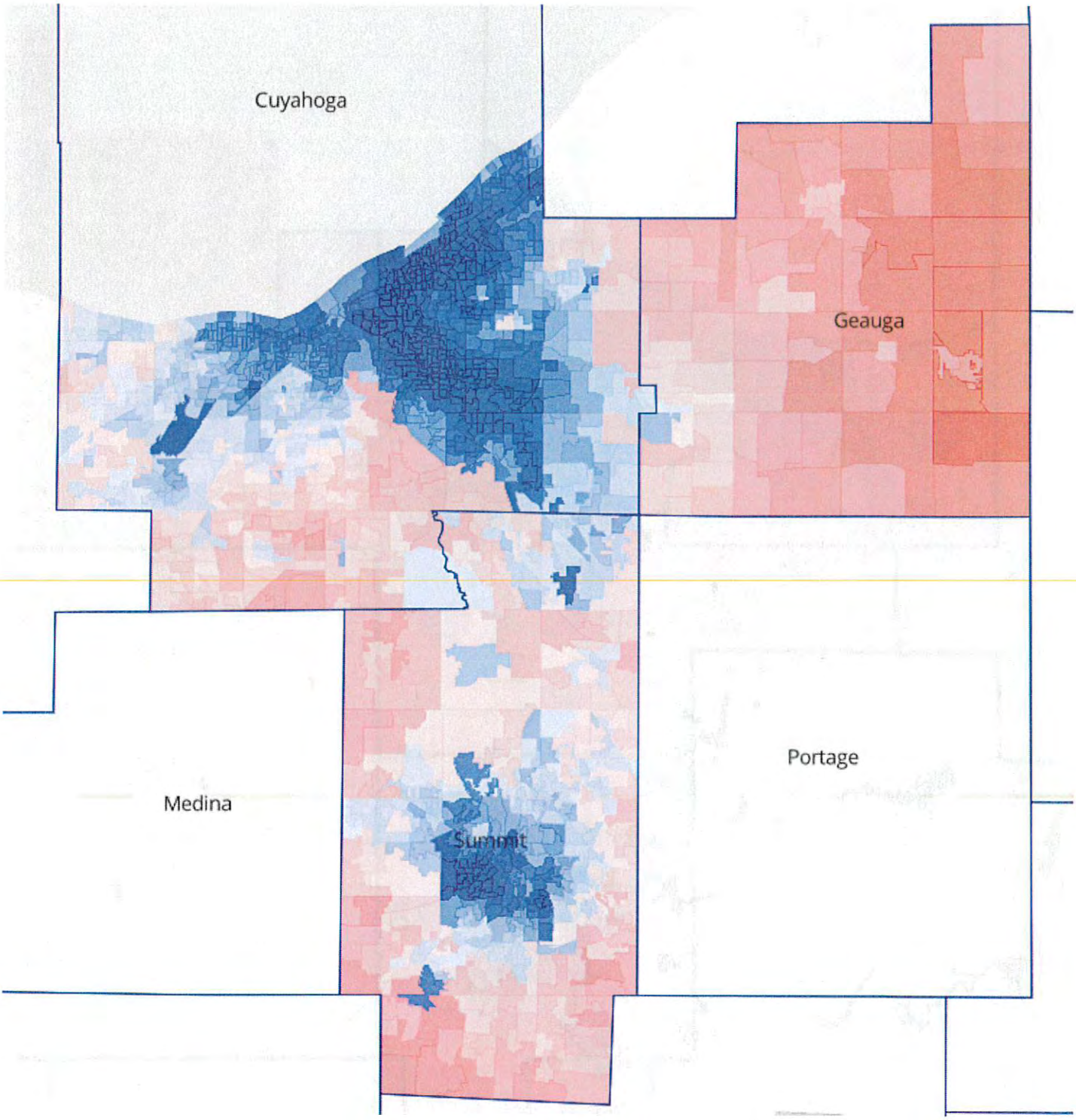

Figure 33: **Cuyahoga, Summit, and Geauga Counties -** The map colors show precinct level partisanship.

HC_0611

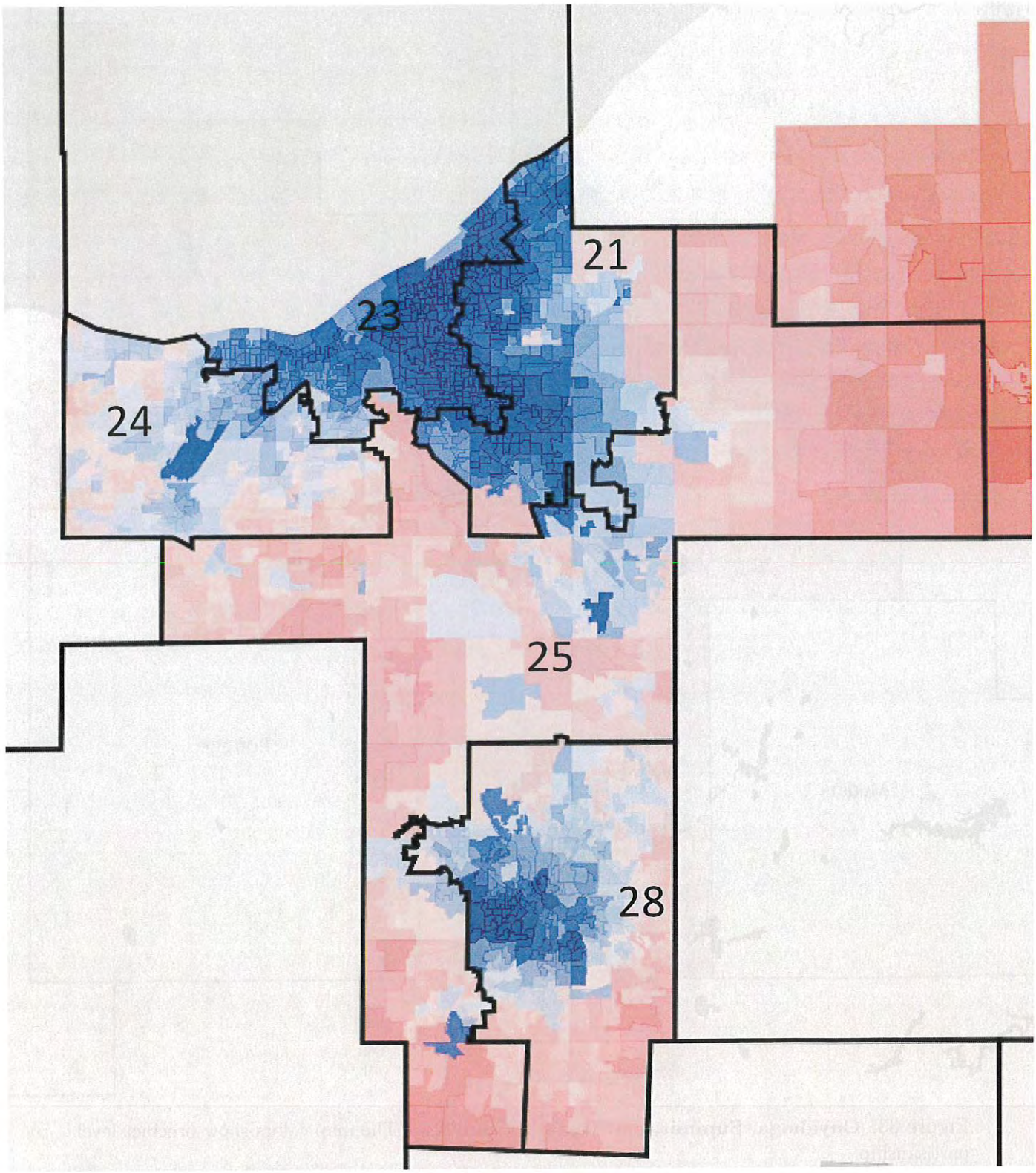

Figure 34: **Enacted Plan Senate Districts in Cuyahoga, Summit, and Geauga Counties** - The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number.

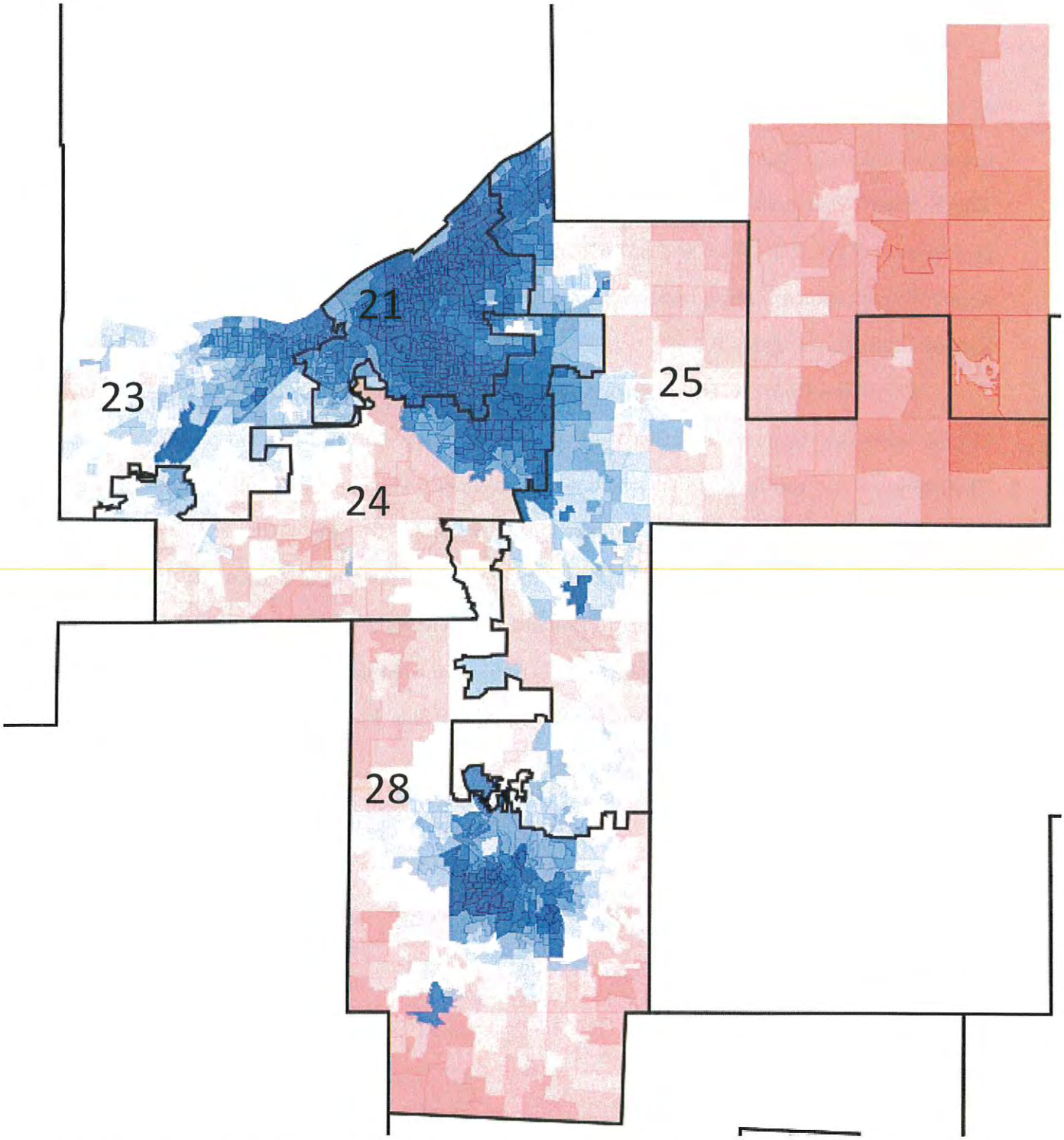

Figure 35: **Sykes 3rd Plan Senate Districts in Cuyahoga, Summit, and Geauga Counties** - The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number.

HC_0613

10.3 Lorain & Erie Counties

The 2020 Census population of Lorain county was 312,964, which is not large enough to constitute a full Senate district (312,964 / 357,559 = 0.88 Senate districts). Therefore Lorain County must be combined with an adjacent county to build a complete Senate district. The Enacted Plan does this by combining Lorain County with Huron County for a total population of 371,529 (371,529 / 357,559 = 1.04 Senate Districts, which is within the 5% population allowance). This creates a Senate district (District 13) that is slightly Republican leaning (49% D, see Table 9).

The Sykes Plan creates a complete Senate district (District 13) by combining Lorain County with Erie County. Together these two counties have a total population of 388,586. This, however, is too large for a single senate district (388,586 / 357,559 = 1.09 Senate Districts, which is outside the 5% population allowance). To resolve this the Sykes Plan splits Erie county and does not include the western-most portion of the county in Senate District 13. The partisan lean of Senate District 13 in the Sykes Plan is slightly Democratic (51% D). Comparing across plans, the two districts have a similar partisan lean (a difference of 2%). The major difference, however, is that the Sykes Plan introduces an additional county split where the Enacted Plan does not.

HC_0614

Table 9: Democratic Partisan Index for Senate Districts in Lorain County

	District Democratic Partisan Index	
District Number:	Enacted Plan	Sykes 3rd Plan
13	0.49	0.51
County:	County Democratic Partisan Index	
Lorain	0.52	
Huron	0.34	
Erie		0.47
Lorain + Huron	0.49	
Lorain + Erie		0.51

Note: For each plan districts with a Democratic partisan index greater than 0.50 are colored blue and districts with a partisan index less than 0.50 are colored red. The partisan seat share for each plan is calculated below the districts for each plan. The county partisan vote shares are noted in the bottom portion of the table.

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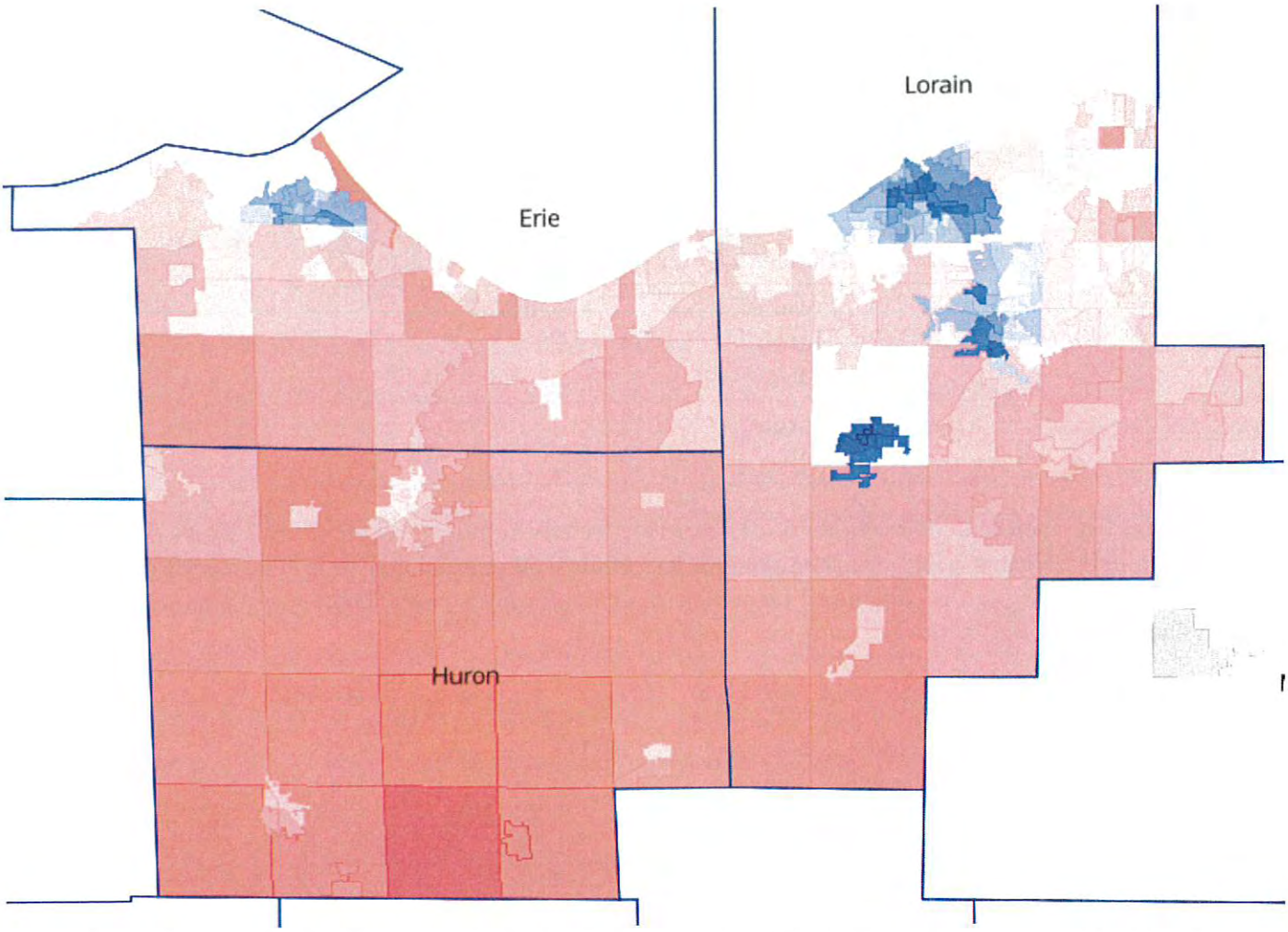

Figure 36: **Lorain, Huron, and Erie Counties -** The map colors show precinct level partisanship.

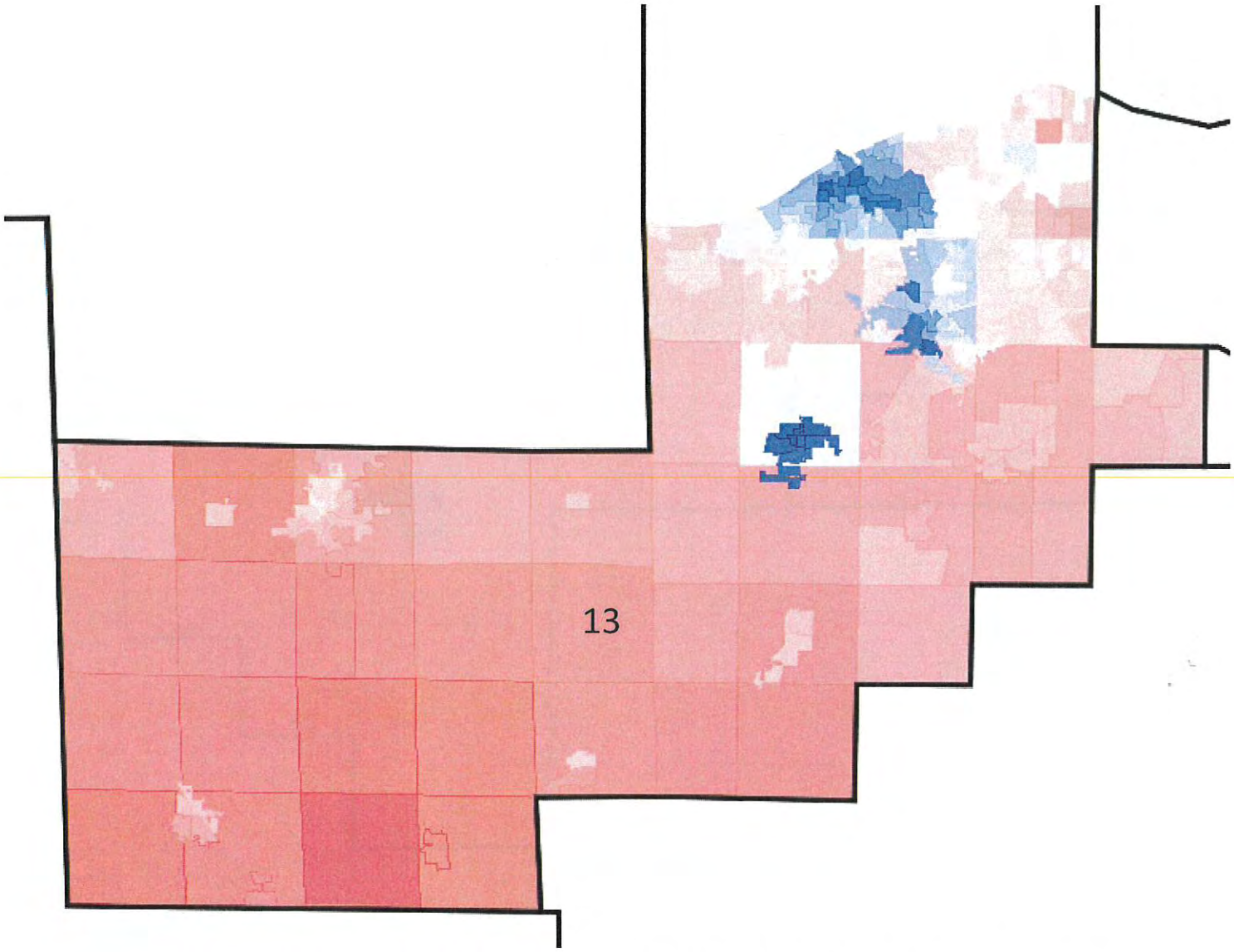

Figure 37: **Enacted Plan Senate Districts in Lorain County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number.

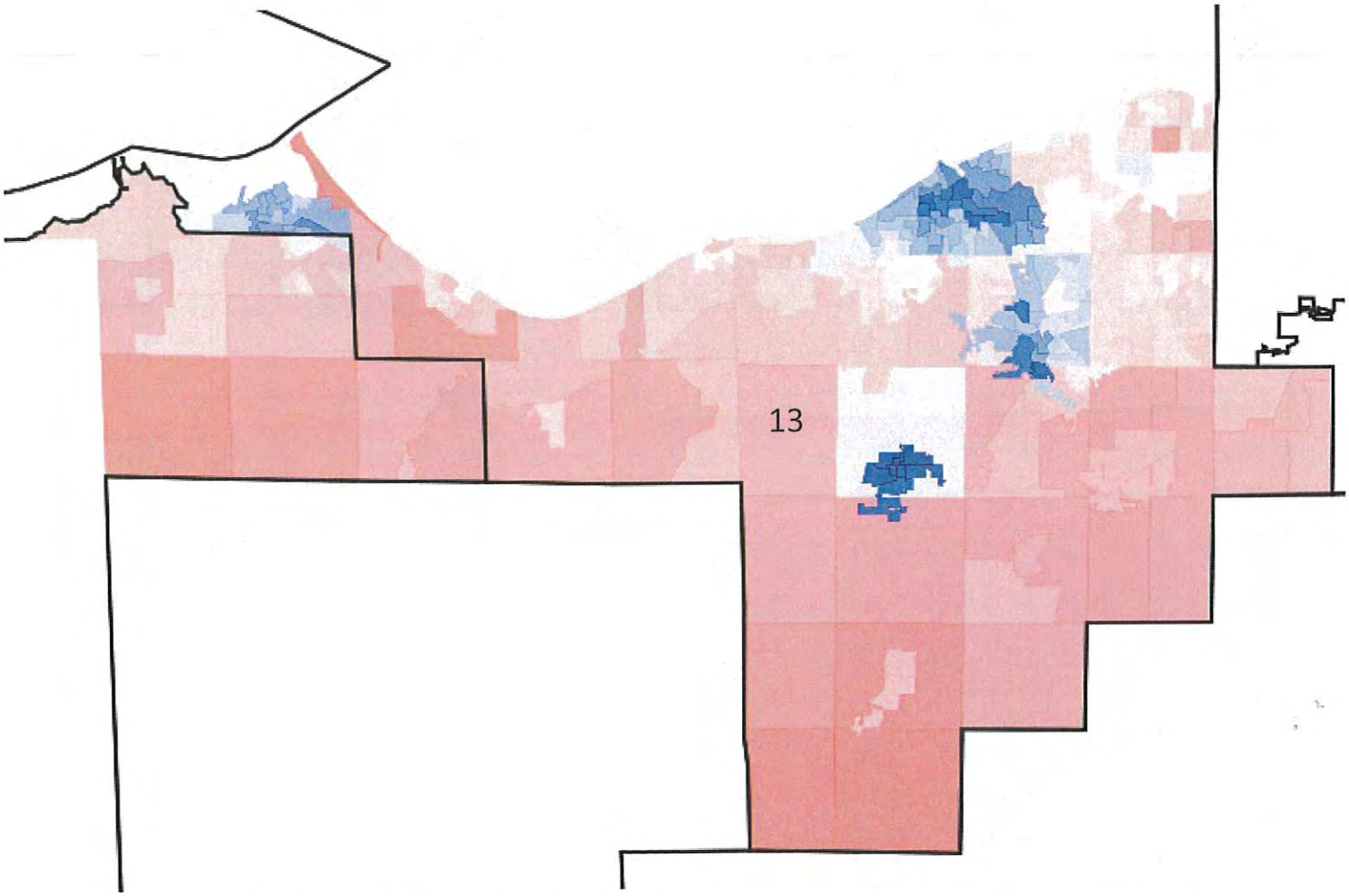

Figure 38: **Sykes 3rd Plan Senate Districts in Lorain County -** The map colors show precinct level partisanship. District boundaries are shown with solid black lines and labeled with their associated district number.

HC_0618

11 Conclusion

Based on the evidence and analysis presented above, my opinions regarding the redistricting process in Ohio in 2021 can be summarized as follows:

- The contemporary political geography of Ohio is such that Democratic majorities are geographically clustered in the largest cities of the state.
- This geographic clustering puts the Democratic Party at a natural disadvantage when single-member districts are drawn.
- This disadvantage arises from the difficulty, and in many cases impossibility, of drawing Democratic-leaning districts in the more rural parts of the state that comply with constitutional requirements.
- A map maker who wishes to draw a plan that is proportionate with statewide election results must intentionally draw districts that disproportionately favor the Democratic Party in the urban parts of the state to make up for the Republican disproportionality that naturally occurs in the rural and exurban portions of the state.
- This present spatial distribution of voters in Ohio has not always been the case historically.
- A review of maps considered by the Commission reveals broad agreement across the vast majority of the state.
- Areas of disagreement between proposed plans arise because the plan proposed by Senator Sykes disproportionately favors the Democratic Party in the urban and suburban parts of the state.

HC_0619

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ACADEMIC APPOINTMENTS

Brigham Young University, Provo, UT

August 2020 - present Associate Professor, Department of Political Science
2014 - July 2020 Assistant Professor, Department of Political Science
2014 - present Faculty Scholar, Center for the Study of Elections and Democracy

EDUCATION

Princeton University Department of Politics, Princeton, NJ

Ph.D., Politics, July 2014

- Advisors: Brandice Canes-Wrone, Nolan McCarty, and Kosuke Imai
- Dissertation: "Buying Representation: the Incentives, Ideology, and Influence of Campaign Contributions on American Politics"
- 2015 Carl Albert Award for Best Dissertation, Legislative Studies Section, American Political Science Association (APSA)

M.A., Politics, December 2011

Brigham Young University, Provo, UT

B.A., International Relations - Political Economy Focus, April, 2008

- *Cum Laude*

RESEARCH INTERESTS

American politics, congressional polarization, political ideology, campaign finance, survey research

PUBLICATIONS

19. **"Ideological Disagreement and Pre-emption in Municipal Policymaking"** with Adam Dynes
Forthcoming at *American Journal of Political Science*
18. **"Comparing Campaign Finance and Vote Based Measures of Ideology"**
Forthcoming at *Journal of Politics*
17. **"The Participatory and Partisan Impacts of Mandatory Vote-by-Mail"**, with John Holbein
Science Advances, 2020. Vol. 6, no. 35, DOI: 10.1126/sciadv.abc7685
16. **"Issue Politicization and Interest Group Campaign Contribution Strategies"**, with Mandi Eatough
Journal of Politics, 2020. Vol. 82: No. 3, pp. 1008-1025

15. **"Campaign Contributions and Donors' Policy Agreement with Presidential Candidates"**, with Brandice Canes-Wrone and Sharece Thrower
Presidential Studies Quarterly, 2019, 49 (4) 770–797

14. **"Conservatism in the Era of Trump"**, with Jeremy Pope
Perspectives on Politics, 2019, 17 (3) 719–736

13. **"Legislative Constraints on Executive Unilateralism in Separation of Powers Systems"**, with Alex Bolton and Sharece Thrower
Legislative Studies Quarterly, 2019, 44 (3) 515–548
Awarded the Jewell-Loewenberg Award for best article in the area of subnational politics published in *Legislative Studies Quarterly* in 2019

12. **"Electoral Competitiveness and Legislative Productivity"**, with Soren Schmidt
American Politics Research, 2019, 47 (4) 683–708

11. **"Does Party Trump Ideology? Disentangling Party and Ideology in America"**, with Jeremy Pope
American Political Science Review, 2019, 113 (1) 38–54

10. **"The Evolution of National Constitutions"**, with Scott Abramson
Quarterly Journal of Political Science, 2019, 14 (1) 89–114

9. **"Who is Ideological? Measuring Ideological Responses to Policy Questions in the American Public"**, with Jeremy Pope
The Forum: A Journal of Applied Research in Contemporary Politics, 2018, 16 (1) 97–122

8. **"Status Quo Bias in Ballot Wording"**, with David Gordon, Ryan Hill, and Joe Price
The Journal of Experimental Political Science, 2017, 4 (2) 151–160.

7. **"Ideologically Sophisticated Donors: Which Candidates Do Individual Contributors Finance?"**, with Brandice Canes-Wrone and Sharece Thrower
American Journal of Political Science, 2017, 61 (2) 271–288.

6. **"Gender Inequalities in Campaign Finance: A Regression Discontinuity Design"**, with Daniel Butler and Jessica Preece
Quarterly Journal of Political Science, 2016, Vol. 11, No. 2: 219–248.

5. **"Representing the Preferences of Donors, Partisans, and Voters in the U.S. Senate"**
Public Opinion Quarterly, 2016, 80: 225–249.

4. **"Donation Motivations: Testing Theories of Access and Ideology"**
Political Research Quarterly, 2016, 69 (1) 148–160.

3. **"Ideological Donors, Contribution Limits, and the Polarization of State Legislatures"**
Journal of Politics, 2016, 78 (1) 296–310.

2. **"Online Polls and Registration Based Sampling: A New Method for Pre-Election Polling"** with Quin Monson, Kelly Patterson and Chris Mann.
Political Analysis 2014, 22 (3) 321–335.

1. **"Causes and Consequences of Political Polarization"** In *Negotiating Agreement in Politics*. Jane Mansbridge and Cathie Jo Martin, eds., Washington, DC: American Political Science Association: 19–53. with Nolan McCarty. 2013.

   - Reprinted in *Solutions to Political Polarization in America*, Cambridge University Press. Nate Persily, eds. 2015
   - Reprinted in *Political Negotiation: A Handbook*, Brookings Institution Press. Jane Mansbridge and Cathie Jo Martin, eds. 2015

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Available Working Papers

"Misclassification and Bias in Predictions of Individual Ethnicity from Administrative Records" (Revise and Resubmit at *American Political Science Review*)

"Taking Cues When You Don't Care: Issue Importance and Partisan Cue Taking"
with Jeremy Pope

"A Revolution of Rights in American Founding Documents"
with Scott Abramson and Jeremy Pope (Under Review)

"410 Million Voting Records Show the Distribution of Turnout in America Today"
with John Holbein (Under Review)

"Partisanship and Trolleyology"
with Ryan Davis (Under Review)

"Who's the Partisan: Are Issues or Groups More Important to Partisanship?"
with Jeremy Pope (Under Review)

"The Policy Preferences of Donors and Voters"

"Estimating Neighborhood Effects on Turnout from Geocoded Voter Registration Records."
with Kosuke Imai

"Super PAC Contributions in Congressional Elections"

Works in Progress

"Collaborative Study of Democracy and Politics"
with Brandice Canes-Wrone, Gregory Huber, and Joshua Clinton

"Preferences for Representational Styles in the American Public"
with Ryan Davis and Adam Dynes

"Representation and Issue Congruence in Congress"
with Taylor Petersen

"Education, Income, and the Vote for Trump"
with Edie Ellison

Invited Presentations

"Are Mormons Breaking Up with Republicanism? The Unique Political Behavior of Mormons in the 2016 Presidential Election"

- Ivy League LDS Student Association Conference - Princeton University, November 2018, Princeton, NJ

"Issue Politicization and Access-Oriented Giving: A Theory of PAC Contribution Behavior"

- Vanderbilt University, May 2017, Nashville, TN

"Lost in Issue Space? Measuring Levels of Ideology in the American Public"

- Yale University, April 2016, New Haven, CT

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"The Incentives, Ideology, and Influence of Campaign Donors in American Politics"

- University of Oklahoma, April 2016, Norman, OK

"Lost in Issue Space? Measuring Levels of Ideology in the American Public"

- University of Wisconsin - Madison, February 2016, Madison, WI

"Polarization and Campaign Contributors: Motivations, Ideology, and Policy"

- Hewlett Foundation Conference on Lobbying and Campaign Finance, October 2014, Palo Alto, CA

"Ideological Donors, Contribution Limits, and the Polarization of State Legislatures"

- Bipartisan Policy Center Meeting on Party Polarization and Campaign Finance, September 2014, Washington, DC

"Representing the Preferences of Donors, Partisans, and Voters in the U.S. Senate"

- Yale Center for the Study of American Politics Conference, May 2014, New Haven, CT

Conference Presentations

Washington D.C. Political Economy Conference (PECO):

- 2017 discussant

American Political Science Association (APSA) Annual Meeting:

- 2014 participant and discussant, 2015 participant, 2016 participant, 2017 participant, 2018 participant

Midwest Political Science Association (MPSA) Annual Meeting:

- 2015 participant and discussant, 2016 participant and discussant, 2018 participant

Southern Political Science Association (SPSA) Annual Meeting:

- 2015 participant and discussant, 2016 participant and discussant, 2017 participant

Teaching Experience

Poli 315: Congress and the Legislative Process

- Fall 2014, Winter 2015, Fall 2015, Winter 2016, Summer 2017

Poli 328: Quantitative Analysis

- Winter 2017, Fall 2017, Fall 2019, Winter 2020, Fall 2020, Winter 2021

Poli 410: Undergraduate Research Seminar in American Politics

- Fall 2014, Winter 2015, Fall 2015, Winter 2016, Summer 2017

Awards and Grants

2019 BYU Mentored Environment Grant (MEG), American Ideology Project, $30,000

2017 BYU Political Science Teacher of the Year Award

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2017 BYU Mentored Environment Grant (MEG), Funding American Democracy Project, $20,000

2016 BYU Political Science Department, Political Ideology and President Trump (with Jeremy Pope), $7,500

2016 BYU Office of Research and Creative Activities (ORCA) Student Mentored Grant x 3

- Hayden Galloway, Jennica Peterson, Rebecca Shuel

2015 BYU Office of Research and Creative Activities (ORCA) Student Mentored Grant x 3

- Michael-Sean Covey, Hayden Galloway, Sean Stephenson

2015 BYU Student Experiential Learning Grant, American Founding Comparative Constitutions Project (with Jeremy Pope), $9,000

2015 BYU Social Science College Research Grant, $5,000

2014 BYU Political Science Department, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), $3,000

2014 BYU Social Science College Award, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), $3,000

2014 BYU Center for the Study of Elections and Democracy, 2014 Washington DC Mayoral Pre-Election Poll (with Quin Monson and Kelly Patterson), $2,000

2012 Princeton Center for the Study of Democratic Politics Dissertation Improvement Grant, $5,000

2011 Princeton Mamdouha S. Bobst Center for Peace and Justice Dissertation Research Grant, $5,000

2011 Princeton Political Economy Research Grant, $1,500

Other Scholarly Activities

Expert Witness in Nancy Carola Jacobson, et al., Plaintiffs, vs. Laurel M. Lee, et al., Defendants. Case No. 4:18-cv-00262 MW-CAS (U.S. District Court for the Northern District of Florida)

Expert Witness in Common Cause, et al., Plaintiffs, vs. LEWIS, et al., Defendants. Case No. 18-CVS-14001 (Wake County, North Carolina)

Expert Witness in Kelvin Jones, et al., Plaintiffs, v. Ron DeSantis, et al., Defendants, Consolidated Case No. 4:19-cv-300 (U.S. District Court for the Northern District of Florida)

Expert Witness in Community Success Initiative, et al., Plaintiffs, v. Timothy K. Moore, et al., Defendants, Case No. 19-cv-15941 (Wake County, North Carolina)

Expert Witness in Richard Rose et al., Plaintiffs, v. Brad Raffensperger, Defendant, Civil Action No. 1:20-cv-02921-SDG (U.S. District Court for the Northern District of Georgia)

Georgia Coalition for the People's Agenda, Inc., et. al., Plaintiffs, v. Brad Raffensberger, Defendant. Civil Action No. 1:18-cv-04727-ELR (U.S. District Court for the Northern District of Georgia)

HC_0624

Expert Witness in Alabama, et al., Plaintiffs, v. United States Department of Commerce; Gina Raimondo, et al., Defendants. Case No. CASE NO. 3:21-cv-00211-RAH-ECM-KCN (U.S. District Court for the Middle District of Alabama Eastern Division)

Additional Training

EITM 2012 at Princeton University - Participant and Graduate Student Coordinator

Computer Skills

Statistical Programs: R, Stata, SPSS, parallel computing

Updated October 20, 2021

HC_0625

Exhibit 36

IN THE SUPREME COURT OF OHIO

League of Women Voters of Ohio, *et al.*, *Relators*, v. Ohio Redistricting Commission, *et al.*, *Respondents.*	Case No. 2021-1193

AFFIDAVIT OF M.V. (TREY) HOOD III

Now comes affiant M.V. (Trey) Hood III, having been first duly cautioned and sworn, deposes and states as follows:

1. I am over the age of 18 and fully competent to make this declaration. I have personal knowledge of the statements and facts contained herein.

2. For the purposes of this litigation, I have been asked by counsel for Respondents Huffman and Cupp to analyze relevant data and provide my expert opinions.

3. To that end, I have personally prepared the report attached to this affidavit as Exhibit A, and swear to its authenticity and to the faithfulness of the opinions.

FURTHER THE AFFIANT SAYETH NAUGHT.

Executed on Oct. 21, 2021	M.V. Hood III M.V. (Trey) Hood III

Sworn or affirmed before me and subscribed in my presence the 21ST day of October, 2021, in the state of Georgia and county of Clark.

Notary Public

VINCENT GARDNER
MY COMMISSION EXPIRES
NOTARY
PUBLIC
JANUARY 10, 2023
OCONEE COUNTY, GEORGIA

4855-2077-6192 v.1

Exhibit A

Expert Report of M.V. Hood III

October 21, 2021

HC_0629

I have been hired by the Respondents, President of the Ohio Senate, Matt Huffman and Speaker of the Ohio House of Representatives, Robert R. Cupp to provide an expert report in the following matters: *Ohio Organizing Collaborative Relators et al v. Ohio Redistricting Commission, et* al (No. 2021-1210); *League of Women Voters of Ohio et al v. Ohio Redistricting Commission et al* (No. 2021-1193); *Bria Bennett et al v. Ohio Redistricting Commission et al* (No. 2021-1198).

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, and the Center for Election Innovation and Research. 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 this affidavit as Exhibit A. 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.

During the preceding five years, I have offered expert testimony (through expert report, deposition, or at trial) in fifteen cases around the United States: *Bethune-Hill v. Virginia State Board of Elections*, 3:14-cv-00852 (E.D. Va.), *Common Cause v. Rucho*, 1:16-cv-1026 (M.D. N.C.), *Greater Birmingham Ministries v. Merrill*, 2:15-cv-02193 (N.D. Ala), *Anne Harding v. County of Dallas, Texas*, 3:15-cv-00131 (N.D. Tex.), *Feldman v. Arizona Secretary of State's Office*, 2:16-cv-16-01065 (Ariz.), *League of Women Voters v. Gardner*, 226-2017-cv-00433 (Hillsborough Superior Court), *Ohio A. Philip Randolph Institute v. Ryan Smith*, 1:18-cv-357 (S.D. Ohio), *Libertarian Party of Arkansas v. Thurston*, 4:19-cv-00214 (E.D. Ark.); *Chestnut v. Merrill*, 2:18-cv-907 (N.D. Ala.), *Common Cause v. Lewis*, 18-CVS-014001 (Wake County Superior Court); *Nielsen v. DeSantis*, 4:20-cv-236 (N.D. Fla.); *Western Native Voice v. Stapleton*, DV-56-2020-377 (Montana Thirteenth Judicial District Court); *Driscoll v. Stapleton*, DV-20-0408 (Montana Thirteenth Judicial District Court); *North Carolina Alliance for Retired Americans v. The North Carolina State Board of Elections*, 20-CVS-8881 (Wake County Superior Court); and *North Carolina v. Holmes*, 18-CVS-15292 (Wake County Superior Court).

I am receiving $400 an hour for my work on this case and $400 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 election administration. My compensation in this case is not dependent upon the outcome of the litigation or the substance of my opinions.

I have been asked by counsel for the Respondents to compare various districting plans for the Ohio State House and State Senate on the basis of expected partisan composition. In order to gauge district partisanship, I use an index created from past elections.[1] More specifically, this index is calculated from all two-party contested statewide elections from 2016 through 2020.[2] This is the same index used by Professor Rodden in his expert report.[3] The index I employ ranges from 0% Republican to 100% Republican. For classification purposes, a district with a partisan index value of 50% or greater is labeled Republican, while any district below 50% is labeled Democratic.

I was asked by counsel to analyze four specific plans, Sykes-1 (9/2/2021); Sykes-3 (9/15/2021); Huffman (9/9/2021); and the Commission Adopted Plan (9/16/2021), and to compare these plans on the basis of their overall partisan composition. I was also asked to group districts based on their geographic location. Those districts residing in one of the six largest counties by population (Franklin; Cuyahoga; Hamilton; Summit; Montgomery; and Lucas) are labeled *Urban* in tables to follow and those districts located in the other 82 counties are labeled *Remaining*.[4]

Ohio State House

Table 1 below characterizes four plans for the Ohio State House on the basis of their partisan makeup. Based on the partisan index employed, the Sykes-1 Plan would yield 55 Republican seats and 44 Democratic seats (55.6% to 44.4%). Most of the Democratic seats are concentrated in the six largest urban counties where a total of 37 of 43 seats were classified as Democratic (86.0%); compared to only six Republican seats. In the remaining counties, this plan would yield 49 of 56 seats to the GOP and 7 Democratic seats.

Table 1. Partisan Comparisons-Ohio State House Plans

	All		**Urban**		**Remaining**	
Plan	**R**	**D**	**R**	**D**	**R**	**D**
Sykes-1	55	44	6	37	49	7
Sykes-3	57	42	7	36	50	6
Difference	+2	-2	+1	-1	+1	-1
Huffman	67	32	14	29	53	3
Adopted	62	37	11	32	51	5
Difference	-5	+5	-3	+3	-2	+2
Seats	99		43		56	

[1]Partisan data for the districting plans analyzed in this report received through counsel.

[2]The following elections are included in the partisan index used for analysis: 2016 U.S. President; 2016 U.S. Senate; 2018 Governor; 2018 Attorney General; 2018 State Auditor; 2018 Secretary of State; 2018 State Treasurer; 2018 U.S. Senate; and 2020 U.S. President.

[3]Affidavit of Dr. Jonathan Rodden. *Bennett v. Ohio Redistricting Commission*. September 24, 2021. Paragraph 17.

[4]For the analyses presented, any House or Senate district that includes a portion of one of these six largest counties is classified in the *Urban* category. For example, in the House plan adopted by the Commission, House District 12 includes part of Franklin County and Union County. As such, this district falls under the *Urban* category for the analyses presented.

The Sykes-3 Plan is very similar to Sykes-1 in terms of potential partisan breakdowns. Overall, the estimated number of Republican seats would increase by two from 55 to 57 (57.6%), with the number of Democratic seats concomitantly dropping by two to 42 (42.4%). Within the urban county subset, the number of Republican seats would increase by one to 7 of 43. Likewise, the number of GOP seats in the remainder of the state would also increase by one, from 49 to 50.

Next, the Huffman plan would be predicted to produce 67 (67.7%) Republican and 32 (32.3%) Democratic seats. Again, the bulk of Democratic seats are found in the largest urban counties. Here the breakdown is 14 Republicans to 29 Democrats. For the remaining counties in the Huffman Plan, the prediction would be 51 Republican seats and 5 Democratic seats.

Finally, the plan adopted by the Redistricting Commission would yield an estimated 62 Republican seats—a decrease of five in comparison to the Huffman Plan. Under this plan Democrats would expect to net 37 total seats. In the urban county subset, the Commission Plan is predicted to produce an 11 to 32 Republican-Democratic split. This is a drop of three GOP seats in comparison to the Huffman Plan and a corresponding increase of three Democratic seats. For districts housed in the remaining counties in the state, the plan adopted by the Commission would produce an expected 51 Republican seats and five Democratic seats—a decrease of two GOP districts in comparison to the Huffman plan.

Table 2 rearranges information housed in Table 1 in order to provide a straightforward comparison between the Sykes-3 Plan and the plan adopted by the Ohio Redistricting Commission. Looking at Table 2, one may note that the Commission Plan is expected to produce five more Republican seats in comparison to the third Sykes Plan (62 versus 57). Four out five of these GOP seats would be located in one of the six largest urban counties, with the fifth seat located in the remaining county subset.

Table 2. Partisan Comparisons-Ohio State House Plans

	All		**Urban**		**Remaining**	
Plan	**R**	**D**	**R**	**D**	**R**	**D**
Sykes-3	57	42	7	36	50	6
Adopted	62	37	11	32	51	5
Difference	+5	-5	+4	-4	+1	-1
Seats	99		43		56	

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Ohio State Senate

Table 3 makes analogous comparisons between the four noted plans for the Ohio State Senate. Beginning with the Skyes-1 Plan, the expected partisan breakdown would be 19 (57.6%) GOP seats and 14 (42.4%) Democratic seats. Again, almost all of the Democratic districts under this plan are located in the urban county subset (13 of 14 total). Conversely, only three of 19 Republican districts are found in the urban county subset, while 16 are located in the remaining counties.

The Sykes-3 Plan is very similar to the first plan, producing an additional Republican seat, from 19 to 20. The overall partisan seat breakdown of this third plan is 60.6% Republican to 39.4% Democratic. The additional Republican seat in the Sykes-3 Plan is found in the urban county subset. The partisan seat distribution from the subset of remaining counties is unchanged from the first to the third Sykes plans.

The Huffman Plan would be predicted to produce 24 Republican seats to nine Democratic seats (72.7% to 27.3%). Here, the split for the urban county subset is 7 Republican seats to nine Democratic seats and for the remaining counties the estimate would be 17 GOP seats and zero Democratic seats.

The plan adopted by the Ohio Redistricting Commission would be expected to produce a total of 23 GOP seats and 10 Democratic seats (69.7% versus 30.3%). Compared to the Huffman Plan, this would be a net decrease of one Republican seat. The Democratic seat pickup under the adopted plan is located in the urban county subset, while the seat distribution in the remaining counties remains unchanged.

Table 3. Partisan Comparisons-Ohio State Senate Plans

	All		**Urban**		**Remaining**	
Plan	**R**	**D**	**R**	**D**	**R**	**D**
Sykes-1	19	14	3	13	16	1
Sykes-3	20	13	4	12	16	1
Difference	+1	-1	+1	-1	0	0
Huffman	24	9	7	9	17	0
Adopted	23	10	6	10	17	0
Difference	-1	+1	-1	+1	0	0
Seats	33		16		17	

HC_0633

As with Table 2, Table 4 below simply provides a more straightforward comparison between the third Sykes plan and the plan adopted by the Commission for the State Senate. The estimated Republican seat count for the adopted plan would be 23, as compared to 20 for the Sykes-3 Plan, or in percentage terms 69.7% to 60.6%. The Commission Plan contains two additional GOP seats in the urban county subset (6 compared to 4) and an additional GOP seat in the reaming county subset (17 compared to 16).

Table 4. Partisan Comparisons-Ohio State Senate Plans

	All		**Urban**		**Remaining**	
Plan	**R**	**D**	**R**	**D**	**R**	**D**
Sykes-3	20	13	4	12	16	1
Adopted	23	10	6	10	17	0
Difference	+3	-3	+2	-2	+1	-1
Seats	33		16		17	

HC_0634

I was also asked by counsel to provide a number of election-based comparisons in tabular format. Table 5. below provides a listing of elections for contested statewide elections in Ohio from 2004 through 2014. During these elections there were 22 two-party contested statewide contests. Of this total, Republican candidates won 63.6% and Democratic candidates 36.4%.

Table 5. Ohio Statewide Election Outcomes, 2004-2014

Election-Cycle	Office	Winner
2004	President	Republican
	U.S. Senator	Republican
2006	Governor	Democrat
	Attorney General	Democrat
	Auditor	Republican
	Secretary of State	Democrat
	Treasurer	Democrat
	U.S. Senate	Democrat
2008	President	Democrat
2010	Governor	Republican
	Attorney General	Republican
	Auditor	Republican
	Secretary of State	Republican
	Treasurer	Republican
	U.S. Senate	Republican
2012	President	Democrat
	U.S. Senate	Democrat
2014	Governor	Republican
	Attorney General	Republican
	Auditor	Republican
	Secretary of State	Republican
	Treasurer	Republican

Summary of Wins	Republican	Democrat
	63.6%	36.4%
	(14)	(8)

Source: Ohio Secretary of State

HC_0635

The second comparison I was asked to produce examined two-party contested statewide elections in Ohio from 2012 through 2020. The results of this analysis are located in Table 6. Of the 16 statewide races during this timeframe, Republicans won 81.3%, as compared to 18.8% for Democrats.

Table 6. Ohio Statewide Election Outcomes, 2012-2020

Election-Cycle	Office	Winner		
2012	President	Democrat		
	U.S. Senate	Democrat		
2014	Governor	Republican		
	Attorney General	Republican		
	Auditor	Republican		
	Secretary of State	Republican		
	Treasurer	Republican		
2016	President	Republican		
	U.S. Senate	Republican		
2018	Governor	Republican		
	Attorney General	Republican		
	Auditor	Republican		
	Secretary of State	Republican		
	Treasurer	Republican		
	U.S. Senate	Democrat		
2020	President	Republican		
Summary of Wins			Republican	Democrat
			81.3%	18.8%
			(13)	(3)

Source: Ohio Secretary of State

Exhibit A: Curriculum Vitae

Curriculum Vitae
(October 2021)

M.V. (Trey) Hood III

Contact Information:

Department of Political Science
School of Public and International Affairs
180 Baldwin Hall
The University of Georgia
Athens, GA 30602

Office Phone: (706) 583-0554
Dept. Phone: (706) 542-2057
Dept. FAX: (706) 542-4421
E-mail: th@uga.edu

Academic Positions:

University of Georgia
- Director, SPIA Survey Research Center, 2016-present
- Director of Graduate Studies, 2011-2016
- Professor, 2013-present
- Associate Professor, 2005-2013
- Assistant Professor, 1999-2005

Texas Tech University
- Visiting Assistant Professor, 1997-1999

Education:

Ph.D.	Political Science	Texas Tech University	1997
M.A.	Political Science	Baylor University	1993
B.S.	Political Science	Texas A&M University	1991

Peer-Reviewed Books:

Rural Republican Realignment in the Modern South: An Untold Story. Forthcoming 2022. Columbia, SC: The University of South Carolina Press. (Seth C. McKee, co-author).

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 in 2014 with new Epilogue]

Peer-Reviewed Publications:

"Tracking Hispanic Political Emergence in Georgia: An Update." 2021. *Social Science Quarterly* 102(1): 259-268. (Charles S. Bullock, III, co-author).

HC_0638

"Switching Sides but Still Fighting the Civil War in Southern Politics." 2020 (Online). *Politics, Groups, and Identities*. (Christopher Cooper, Scott H. Huffmon, Quentin Kidd, Gibbs Knotts, Seth C. McKee, co-authors).

"The Election of African American State Legislators in the Modern South." 2020. *Legislative Studies Quarterly* 45(4): 581-608. (Charles S. Bullock, III, William Hicks, Seth C. McKee, Adam S. Myers, and Daniel A. Smith, co-authors).

"What's in a Name? Gauging the Effect of Labels on Third Party Vote Shares." 2020. *Journal of Elections, Public Opinion & Parties*. (Seth C. McKee, co-author).

"Why Georgia, Why? Peach State Residents' Perceptions of Voting-Related Improprieties and their Impact on the 2018 Gubernatorial Election." 2019. *Social Science Quarterly* 100(5): 1828-1847. (Seth C. McKee, co-author).

"Palmetto Postmortem: Examining the Effects of the South Carolina Voter Identification Statute." 2019. *Political Research Quarterly* (Scott E. Buchanan, co-author).

"Contagious Republicanism in Louisiana, 1966-2008." 2018. *Political Geography* 66(Sept): 1-13. (Jamie Monogan, co-author).

"The Comeback Kid: Donald Trump on Election Day in 2016." 2019. *PS: Political Science and Politics* 52(2): 239-242. (Seth C. McKee and Daniel A. Smith, co-authors).

"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.

"*Black Votes Count*: The 2014 Republican Senate Nomination in Mississippi." 2017. *Social Science Quarterly* 98(1): 89-106. (Seth C. McKee, coauthor).

"Sunshine State Dilemma: Voting for the 2014 Governor of Florida." 2015. *Electoral Studies* 40: 293-299. (Seth C. McKee, co-author).

"Tea Leaves and Southern Politics: Explaining Tea Party Support Among Southern Republicans." 2015. *Social Science Quarterly* 96(4): 923-940. (Quentin Kidd and Irwin L. Morris, co-authors).

"True Colors: White Conservative Support for Minority Republican Candidates." 2015. *Public Opinion Quarterly* 79(1): 28-52. (Seth C. McKee, co-author).

"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).
[Winner of the 2014 Hahn-Sigelman Prize]

"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).

"Stranger Danger: Redistricting, Incumbent Recognition, and Vote Choice." 2010. *Social Science Quarterly* 91:344-358. (Seth C. McKee, co-author).

"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. *Social 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).

"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).

Invited Publications:

"Race and the Ideological Transformation of the Democratic Party: Evidence from the Bayou State." 2005. *American Review of Politics* 25:67-78.

Book Chapters:

"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).

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"Texas: A Shifting Republican Terrain." 2021. In *The New Politics of the Old South, 7th 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, 6th 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, 5th 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*, 5th 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*.

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):
Co-Principal Investigator. "Georgia Absentee Ballot Signature Verfication 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 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:
"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 an 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 an 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 the Annual Meeting of the Midwest Political Science Association. Chicago, IL.

"One-Stop to Victory? North Carolina, Obama, and the 2008 General Election." (with Justin Bullock, Paul Carlsen, Perry Joiner, Jeni McDermott, and Mark Owens). 2011. Paper presented at the Annual Meeting of the Midwest Political Science Association Meeting. Chicago, IL.

"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.

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"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.

"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 Annual Meeting of the Southern Political Science Association. Atlanta, GA.

"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.

"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 Midwest Political Science Association. Chicago.

"The Rational Southerner: The Local Logic of Partisan Transformation in the South." (with Quentin Kidd and Irwin L. Morris). 2008. Paper presented at the Citadel Symposium on Southern Politics. Charleston, SC.

"Stranger Danger: The Influence of Redistricting on Candidate Recognition and Vote Choice." (with Seth C. McKee). 2008. Paper presented at the Annual Meeting of the Southern Political Science Association. New Orleans.

"Backward Mapping: Exploring Questions of Representation via Spatial Analysis of Historical Congressional Districts." (with Michael Crespin). 2007. Paper presented at the Annual Meeting of the American Political Science Association. Chicago.

"Worth a Thousand Words? : An Analysis of Georgia's Voter Identification Statute." (with Charles S. Bullock, III). 2007. Paper presented at the Annual Meeting of the Southwestern Political Science Association. Albuquerque.

"Gerrymandering on Georgia's Mind: The Effects of Redistricting on Vote Choice in the 2006 Midterm Election." (with Seth C. McKee). 2007. Paper presented at the Annual Meeting of The Southern Political Science Association. New Orleans.

"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.

"Black Mobilization and the Growth of Southern Republicanism: Two Sides of the Same Coin?" (with Quentin Kidd and Irwin L. Morris). 2006. Paper presented at the Annual Meeting of the Southern Political Science Association. Atlanta.

"Exploring the Linkage Between Black Turnout and Down-Ticket Challenges to Black Incumbents." (With Troy M. Gibson). 2006. Paper presented at the Annual Meeting of the Southern Political Science Association. Atlanta.

"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 21st 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

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.

Professional Service:
Listed expert. MIT Election Data and Science Lab.

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

Institutional Service (University-Level):
University Promotion and Tenure Committee, 2019-2021.

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.