

# **Exhibit 30**

Jordan M. Ragusa , Ph.D.  
The South Carolina State Confvs.McMaster/Alexander

June 28, 2022

Page 176

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UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

THE SOUTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,  
Plaintiffs,  
vs. CASE NO. 3:21-cv-03302-MBS  
TJH-RMG  
  
THOMAS C. ALEXANDER, et al.,  
  
Defendants.

VTC  
DEPOSITION OF: JORDAN M. RAGUSA, PH.D.  
(Appearing by VTC)  
VOLUME II (Pages 176 - 344)

DATE: June 28, 2022

TIME: 10:03 a.m.

LOCATION: College of Charleston  
Charleston, SC

TAKEN BY: Counsel for the Defendants  
REPORTED BY: Susan M. Valsecchi, CRR  
Registered Professional Reporter  
(Appearing by VTC)

1       versus whether -- how many of those there were  
2       versus the last time, did you?

3               A.     I don't report precinct splits in my  
4       analysis, no.

5               Q.     You didn't look at compactness, right?

6               A.     That's right.

7               Q.     You didn't look at the core retention,  
8       right?

9               A.     I would qualify that. I would say the  
10      core retention is part of Model 2 in my analysis.  
11      If you're asking whether I report core retention  
12      statistics, I do not.

13              Q.     You said that you looked at some  
14      communities of interest. You argued, I think, that  
15      it was baked in there because it talked about the  
16      county, and you looked at it, what the county was,  
17      and then whatever the numbers might be in the VTDs,  
18      but you didn't look at anything beyond just those  
19      kind of generic or general communities of interest  
20      did you?

21                      MR. FREEDMAN: Object to form.

22                      THE WITNESS: What I would say is that  
23      by looking at counties, that in part  
24      encompasses communities of interest.

25                      By looking at the district as it was

1 previously drawn and all the VTDs contained  
2 within the prior district, that in part gets  
3 at communities of interest. And by looking  
4 at demographic factors, like partisanship  
5 and race and precinct size, that, in a way,  
6 gets at communities of interest.

7 But to your earlier question, on very  
8 granular levels, looking at neighborhoods,  
9 no, that is not something contained in my  
10 analysis.

11 BY MR. TYSON:

12 Q. And so you didn't look at political  
13 subdivision boundaries that were protected either,  
14 did you?

15 MR. FREEDMAN: Object to form.

16 THE WITNESS: Not explicitly, although  
17 splits and repaired splits are included in  
18 my analysis.

19 BY MR. TYSON:

20 Q. But more importantly, one of the most  
21 important aspects that you didn't look at was  
22 public input, correct?

23 MR. FREEDMAN: Objection, form.

24 THE WITNESS: I did not review the  
25 transcripts or the live proceedings of

1 citizen input, that's correct.

2 BY MR. TYSON:

3 Q. So you'd agree that your analysis  
4 doesn't tell anything close to the whole story of  
5 how the congressional plan was constructed, right?

6 MR. FREEDMAN: Object to form.

7 THE WITNESS: I don't agree with that.

8 BY MR. TYSON:

9 Q. Well, we just went through seven things  
10 that you didn't even look at. How can you say  
11 that, Dr. Ragusa? Help me.

12 MR. FREEDMAN: Object to form.

13 THE WITNESS: Well, one thing I would  
14 note is that it's either the Senate or the  
15 House, or perhaps both, among the  
16 redistricting criteria, they state quite  
17 specifically that the factors are not  
18 ranked, that it's not the case that some are  
19 more important than others. And so I don't  
20 know how you can make a determination about  
21 the overall percentage of what is  
22 permissible or impermissible.

23 My analysis speaks to a very specific  
24 question, which is whether or not race was a  
25 factor in the design of the district. Given

1 the 14th and 15th Amendments in the Voting  
2 Rights Act, that's a pretty important  
3 consideration.

4 BY MR. TYSON:

5 Q. No, that's right, but we've spent now  
6 three or four hours, but there were a lot of other  
7 considerations that you haven't taken the time to  
8 go figure out as to why the mapmakers drew  
9 Congressional District 6 the way that they did, or  
10 Congressional District 1 the way that they did,  
11 correct?

12 MR. FREEDMAN: Object to form.

13 THE WITNESS: Again, I think a lot of  
14 those factors are part and parcel to the  
15 analysis, but to your point, some of them  
16 are not things that I looked at  
17 specifically.

18 BY MR. TYSON:

19 Q. Yeah, and so I guess that's the part  
20 that I'm trying to get to. I mean, I understand  
21 that you look at numbers and numbers don't lie and  
22 you pull data for your statistical modeling and you  
23 conclude that race was a factor, right?

24 MR. FREEDMAN: Object to form.

25 THE WITNESS: In the design of five of