

Exhibit 2

Declaration Submitted on Behalf of Plaintiffs in
Amber Sherman, et al. v. Tre Hargett, et al., No. 26 Civ. 616

Kassra A.R. Oskooii, Ph.D.

University of Delaware

May 12, 2026

A. Background and Qualifications

1. I, Kassra A.R. Oskooii, am over 18 years of age and am competent to testify.
2. I am a tenured, Associate Professor in the department of Political Science and International Relations at the University of Delaware (“UD”), having joined the faculty in 2016 as an Assistant Professor. I am also an affiliated faculty member at UD’s Data Science Institute, Master of Science in Data Science, Center for Political Communication, and Center for the Study of Diversity. My research and teaching focuses on American political behavior, political methodology, political psychology, political representation, voting rights, and redistricting. My research has appeared in numerous leading peer-reviewed, social science journals, including *Sociological Methods and Research*, *Political Behavior*, *Public Opinion Quarterly*, *Political Psychology*, *Advances in Political Psychology*, *British Journal of Political Science*, *Electoral Studies*, *Perspectives on Politics*, *Political Research Quarterly*, *Urban Affairs Review*, *State Politics and Policy Quarterly*, and *Journal of Public Policy*.
3. I received my Ph.D. in Political Science, specializing in American politics, minority and race politics, and political methodology, from the University of Washington in Seattle, Washington in 2016. Prior to that, I received my master’s degree in political science at the University of Washington and received a political methodology field certificate from the Center for Statistics & the Social Sciences in 2013. I received my Bachelor of Arts in Political Science in 2008 at the University of Washington, with minors in Human Rights and Law, Societies, and Justice.
4. Throughout my academic career, I have taught courses on a range of topics related to voting behavior and redistricting. This includes instruction on demographic and electoral data collection and analysis utilizing election returns, voter history files, Decennial U.S. Census data, and American Community Survey data. I have also instructed on the evaluation of electoral maps for compliance with the Voting Rights Act of 1965 (“VRA”) and traditional redistricting principles.
5. I have served as an expert witness in various redistricting and voting rights cases. In my work as an expert witness, I have utilized demographic data derived from voter files, the U.S. Decennial Census or American Community Survey to conduct racially polarized voting (“RPV”) analyses and electoral performance analyses, to develop demonstrative / illustrative and remedial plans, and to evaluate plans for compliance with the VRA and traditional and state-specific redistricting principles.
6. Relevant to this report, in *Soto Palmer v. Hobbs*, No. 3:22-cv-05035-RSL (W.D. Wash. 2021) [Testified], the court adopted one of my remedial legislative redistricting plans for the State of Washington, which I developed without the use of racial or political data to address a violation of Section 2 of the VRA. In *League of Women Voters of Utah, et al. v. Utah State Legislature, et al.*, No. 220901712/2022(Utah 3rd Dist. Ct.) [Testified], the court adopted one of my remedial congressional district plans for the State of Utah, which I developed without the use of racial or political data to address a violation of voter-approved reforms against partisan gerrymandering. Additionally, I was found to be “highly credible”

as a *Gingles I* expert by the District Court of Kansas in *Coca v. Dodge City*, No. 6:22-cv-1274 (D. Kan. July 10, 2024) [Deposed and Testified], where I presented illustrative *Gingles I* plans that similarly did not rely on race or political data.

7. Other cases I have submitted expert reports for include, *Dickinson Bay Area Branch NAACP v. Galveston County, Texas*, No. 3:22-cv-117-JVB (S.D. Tex. 2023) [Deposed & Testified], *Baltimore County Branch of the NAACP v. Baltimore County, Maryland*, No. 1:21-cv-03232-LKG (D. Md. 2022), *Common Cause Florida v. Lee*, No. 4:22-cv-00109-AW-MAF (N.D. Fla. 2022), *Common Cause Florida v. Byrd*, No. 4:22-cv-00109-AW-MAF (N.D. Fla. 2022) [Deposed], *Reyes v. Chilton*, No. 4:21-cv-05075-MKD (E.D. Wash. 2021) [Deposed], *Finn et al. v. Cobb County Board of Elections and Registration*, No. 1:22-cv-02300-ELR (N.D. Ga. 2022), *Caroline County Branch of the NAACP v. Town of Federalsburg*, Civ. Action No. 23-SAG-00484 (D. Md. 2023), *Wicomico County Branch of the NAACP et al. v. Wicomico County, MD*, Civ. Action No. 23-MJM-03325 (D. Md. 2023), *New York Communities for Change et al v. County of Nassau, NY*, No. 602316/2024 (N.Y.S.) [Deposed & Testified], and *NC NAACP et al. v. Berger et al.*, No. 23-cv-1104 (M.D. NC. 2023) [Deposed & Testified].
8. As an expert consultant, I have also advised the State of Maryland on its 2021 Congressional and Legislative redistricting plans as it pertains to compliance with the VRA. I have also examined and redrawn the 2022 school board district boundaries of the Roswell Independent School District in the state of New Mexico.
9. I have published peer-reviewed academic papers on ecological inference (“EI”) methods as it pertains to racially polarized voting analysis. In 2022, I published a paper in the top-ranked *Sociological Methods and Research* journal titled “Estimating Candidate Support in Voting Rights Act Cases: Comparing Iterative EI & EI-RxC Methods.” In 2016 I published a paper titled “eiCompare: Comparing Ecological Inference Estimates across EI and EI:RxC” in the R Journal. Both papers utilize a software package I co-developed called “eiCompare,” which is a reproducible code that quantifies, compares, and represents data on racial voting patterns. The package enables social scientists to use aggregate-level election and demographic data retrieved from the U.S. Census, American Community Survey, or voter files to predict racial and ethnic group voting behavior. eiCompare has been cited in numerous academic papers and in court filings.
10. More information about my qualifications and expert witness and consulting background, including all my publications over the past ten years, can be found on my Curriculum Vitae, appended to this declaration as **Appendix A**.
11. I am being compensated by the Plaintiffs at a rate of \$550 an hour for all the work in this matter. My compensation is not in any way contingent on the content of my opinions or the outcome of this matter.

B. Scope of Work

12. Counsel for the Plaintiffs asked me to conduct six sets of analyses.

13. *First*, to calculate district-level population and to compare the share of the Non-Hispanic (“NH”) Black Voting Age Population (“BVAP”) and the White Voting Age Population (“WVAP”) in the congressional districts under the 2022 Enacted Map (the “2022 Map”) and the 2026 Enacted Map (the “2026 Map”).
14. *Second*, to compare district compactness and the extent to which counties, municipalities, and voting tabulation districts (“VTDs”) are split under the 2022 Map and the 2026 Map.
15. *Third*, to analyze how the BVAP of the City of Memphis and Shelby County is distributed across congressional districts under the 2022 Map and 2026 Map.
16. *Fourth*, to determine the extent to which voting in District 9 of the 2022 Map and Districts 5, 8, and 9 of the 2026 Map is racially polarized, such that Black and White voters tend to prefer different candidates.
17. *Fifth*, to conduct a performance, or reconstituted precinct/VTD, analysis to assess whether, within District 9 of the 2022 Map and Districts 5, 8, and 9 of the 2026 Map, candidates preferred by Black voters usually lose to candidates preferred by White voters.
18. *Sixth*, to examine Tennessee’s competitive, biracial 2022 Democratic gubernatorial primary and compare racial voting patterns in District 9 under the 2022 Map with those in Districts 5, 8, and 9 under the 2026 Map.

C. Data Sources

19. I obtained Tennessee’s congressional district block-assignment file for the 2022 Map from Dave’s Redistricting Application (“DRA”) and the district shapefile for the 2026 Map from counsel for the Plaintiffs. I understand both sources to represent the official 2022 and 2026 congressional district boundaries.
20. I used 2020 Decennial U.S. Census data to calculate population statistics and to compute any analyses relying on voting age population (“VAP”).
21. I relied on GIS software, mainly ESRI’s Redistricting Application, for comparative mapping analyses, including county, municipal, and VTD splits across different congressional boundaries.
22. I conducted a comparative compactness analysis of the plans using two commonly applied metrics—Reock and Polsby-Popper—with ESRI’s Redistricting Application.¹ I also

¹ Reock score is calculated by taking the ratio of the area of a district to the area of its minimum bounding circle. Polsby-Popper score is calculated by taking the ratio of the area of a district to the area of a circle whose circumference matches the perimeter of the district. Both scores range from 0 to 1. Scores closer to 0 indicate a less compact jurisdiction and scores closer to 1 indicate a more compact jurisdiction.

provide a calculation of the total boundary length of each district in miles, which is referred to as a “perimeter” measure.

23. Statistics for district-level or other geographic boundaries’ racial and ethnic VAP were obtained from ESRI’s Redistricting Application.
24. I downloaded election data disaggregated to 2020 Census blocks from the Redistricting Data Hub (“RDH”) and used the open-source programming language *R* to conduct RPV and performance analyses, and to construct the necessary datasets and variables for such analyses.²

D. Comparative Analysis of District-Level Population

25. Figures 1–2 display the congressional district boundaries of the 2022 Map and the 2026 Map.

Figure 1: District Boundaries of Congressional 2022 Map

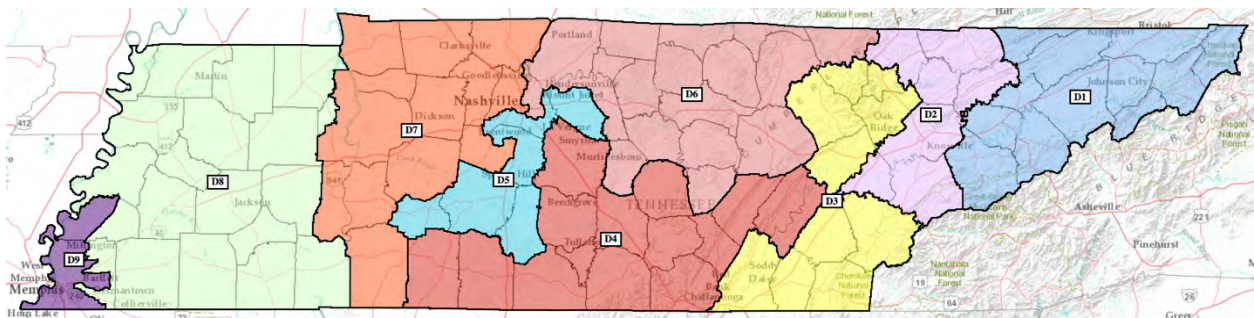
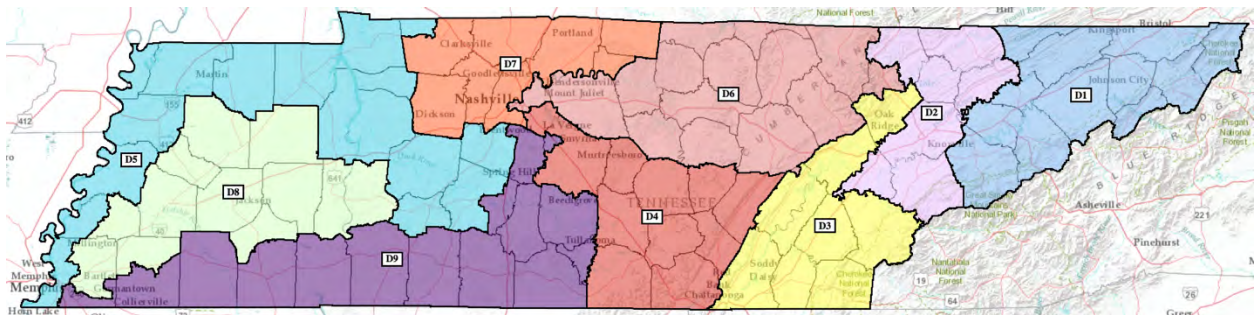


Figure 2: District Boundaries of Congressional 2026 Map



26. Tables 1–2 report racial and ethnic population statistics by congressional districts for the 2022 and 2026 Maps.³

² I obtained data for 2022 election contests in the form of a shapefile from RDH through the Plaintiff’s counsel. I then disaggregated the data down to Census blocks, merged in Census demographic data, and then aggregated the data up to precincts.

³ For ease of presentation, I only include the three largest racial and ethnic group categories in the state of Tennessee. Additional population statistics for other groups can be made available should the Court find it helpful.

Table 1: District-Level Total Population Statistics by Race and Ethnicity, 2022 Map

District No.	TOTAL Population	NH White	NH White %	NH Black	NH Black %	Hispanic	Hispanic %
1	767,871	674,765	87.9%	22,427	2.9%	37,332	4.9%
2	767,871	630,610	82.1%	52,083	6.8%	41,560	5.4%
3	767,871	597,466	77.8%	84,049	10.9%	44,410	5.8%
4	767,872	582,497	75.9%	79,635	10.4%	61,910	8.1%
5	767,871	531,224	69.2%	97,827	12.7%	79,120	10.3%
6	767,871	596,648	77.7%	75,487	9.8%	59,323	7.7%
7	767,871	533,197	69.4%	130,738	17.0%	57,129	7.4%
8	767,871	559,984	72.9%	140,345	18.3%	27,811	3.6%
9	767,871	193,855	25.2%	469,413	61.1%	70,592	9.2%

Table 2: District-Level Total Population Statistics by Race and Ethnicity, 2026 Map

District No.	TOTAL Population	NH White	NH White %	NH Black	NH Black %	Hispanic	Hispanic %
1	767,871	674,765	87.9%	22,427	2.9%	37,332	4.9%
2	767,871	630,609	82.1%	52,085	6.8%	41,552	5.4%
3	767,871	595,695	77.6%	83,955	10.9%	45,941	6.0%
4	767,871	492,688	64.2%	121,527	15.8%	100,984	13.2%
5	767,871	470,378	61.3%	218,933	28.5%	43,125	5.6%
6	767,871	590,253	76.9%	85,363	11.1%	50,988	6.6%
7	767,871	556,416	72.5%	113,002	14.7%	53,522	7.0%
8	767,871	460,793	60.0%	209,398	27.3%	53,788	7.0%
9	767,872	428,649	55.8%	245,314	31.9%	51,955	6.8%

27. Under the 2022 Map, 8 districts are majority NH White, while only 1 district (District 9, Figure 1) is a majority NH Black district. However, the 2026 Map significantly alters the racial composition of the districts (see Figure 2) by cracking the Black population concentrated in 2022 District 9 and spreading it across 2026 Districts 5, 8, and 9 (which is substantially reconfigured from its version in the 2022 Map). As a result, all districts in the 2026 Map are now majority NH White, with the NH Black population comprising somewhere between 27–32% of the population in each of Districts 5, 8, and 9.
28. Subsetting the population data to individuals 18 years of age or older yields substantively similar results. Tables 3–4 report racial and ethnic VAP statistics by congressional district for the 2022 and 2026 Maps.

Table 3: District-Level VAP Statistics by Race and Ethnicity, 2022 Map

District No.	TOTAL VAP	NH WVAP	NH WVAP %	NH BVAP	NH BVAP %	HVAP	HVAP %
1	616,550	552,337	89.6%	15,496	2.5%	23,185	3.8%
2	609,503	513,806	84.3%	36,251	5.9%	26,468	4.3%
3	607,013	485,954	80.1%	61,262	10.1%	28,002	4.6%
4	587,445	461,084	78.5%	55,494	9.4%	38,964	6.6%
5	582,505	418,881	71.9%	70,788	12.2%	51,058	8.8%
6	603,423	483,180	80.1%	54,240	9.0%	38,463	6.4%
7	597,796	429,888	71.9%	95,598	16.0%	37,116	6.2%
8	597,005	447,346	74.9%	103,646	17.4%	17,498	2.9%
9	583,233	165,820	28.4%	346,088	59.3%	44,963	7.7%

**Note: NH BVAP represents individuals identified as Non-Hispanic Any Part Black*

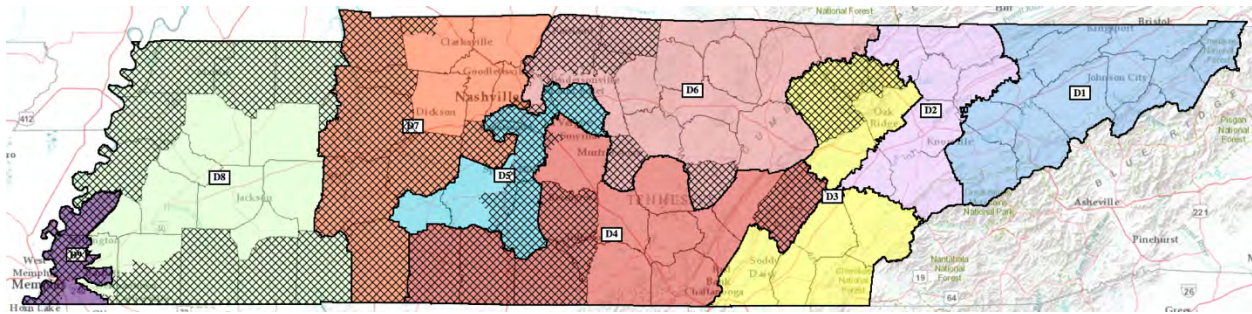
Table 4: District-Level VAP Statistics by Race and Ethnicity, 2026 Map

District No.	TOTAL VAP	NH WVAP	NH WVAP %	NH BVAP	NH BVAP %	HVAP	HVAP %
1	616,550	552,337	89.6%	15,496	2.5%	23,185	3.8%
2	609,512	513,810	84.3%	36,253	5.9%	26,464	4.3%
3	606,482	484,588	79.9%	60,906	10.0%	28,990	4.8%
4	586,518	395,002	67.3%	87,799	15.0%	65,271	11.1%
5	586,652	373,255	63.6%	159,948	27.3%	27,649	4.7%
6	614,497	485,740	79.0%	62,682	10.2%	33,671	5.5%
7	593,732	444,772	74.9%	81,818	13.8%	34,363	5.8%
8	590,123	370,795	62.8%	153,436	26.0%	33,646	5.7%
9	580,407	337,997	58.2%	180,525	31.1%	32,478	5.6%

**Note: NH BVAP represents individuals identified as Non-Hispanic Any Part Black*

29. The VAP data show the same pattern observed with the total population statistics. Under the 2022 Map, District 9 is the only majority NH BVAP district at 59.3%. Under the 2026 Map, no district retains a majority NH BVAP. As with total population, the NH BVAP previously concentrated in the 2022 District 9 is divided across 2026 Districts 5, 8, and 9, with the NH Black population comprising somewhere between 26–31.1% of the voting-age population in those districts.
30. Figure 3 further highlights where district boundaries were redrawn between the 2022 and 2026 enacted plans. Checkered areas indicate territory reassigned across districts. Most changes are concentrated in Central Tennessee and Southwest Tennessee—including where Memphis and Shelby County are located—with comparatively fewer shifts in other regions. These are not minor adjustments; they represent substantial reconfiguration of district geography. Substantively, these changes alter district racial composition, particularly the distribution of White and Black populations, and are associated with the elimination of the state’s only majority-Black congressional district.

Figure 3: Areas of boundary change between the 2022 and 2026 Congressional Maps.
Checkered areas indicate geography reassigned to different districts



E. Comparative District Compactness Analyses

31. Table 5 reports district compactness measures for the 2022 and 2026 Maps. Compactness measures assess how regular or irregular a district's shape is and are therefore useful in redistricting analysis. Irregular district boundaries can indicate that lines were drawn to pack or crack particular groups of voters. More compact districts generally keep together people who live near one another and may, though not always, better preserve communities with shared geographic, cultural, social, or economic interests. For that reason, compactness is commonly treated as a traditional redistricting principle.⁴
32. The Reock score is calculated by dividing the area of a district by the area of the smallest circumscribing circle that can enclose the district. A district that fills more of that circle receives a higher score and is therefore considered more compact. Because the measure depends on the smallest circle enclosing the district's farthest points, it is sensitive to elongated extensions and other boundary extremities.
33. The Polsby-Popper score measures compactness by comparing a district's area to the area of a circle with the same perimeter as the district. This measure is sensitive to irregularities along a district's boundary, including jagged edges, indentations, and protrusions.
34. Both scores range from 0 to 1. Scores closer to 0 indicate a less compact district, while scores closer to 1 indicate a more compact district.
35. I also include district perimeters in miles, which provide a straightforward measure of how extended or irregular district boundaries are.
36. These compactness measures were computed using ESRI for Redistricting GIS software.

⁴ For example, see the redistricting criteria published by the National Conference of State Legislatures: <https://www.ncsl.org/elections-and-campaigns/redistricting-criteria>

Table 5: Compactness Scores by District and Congressional Map

District	Reock		Polsby-Popper		Perimeter in Miles	
	2022 Map	2026 Map	2022 Map	2026 Map	2022 Map	2026 Map
1	0.32	0.32	0.27	0.27	458.7	458.7
2	0.41	0.41	0.17	0.17	452.6	452.7
3	0.34	0.32	0.15	0.20	577.3	481.3
4	0.27	0.43	0.19	0.25	650.9	463.3
5	0.28	0.21	0.13	0.09	446.5	986.5
6	0.37	0.30	0.25	0.24	555.9	551.7
7	0.40	0.33	0.27	0.25	534.5	383.9
8	0.58	0.35	0.29	0.20	635.7	558.5
9	0.29	0.17	0.12	0.14	290.0	754.8
Average	0.36	0.32	0.20	0.20	511.4	565.7

37. The results show that compactness is generally lower under the 2026 Map than under the 2022 Map. Because compactness is a relative concept, the most useful comparison is between the same district across plans rather than any abstract threshold. On that basis, several districts, and especially Districts 5, 8, and 9, become materially less compact under the 2026 configuration.
38. District 5 shows one of the clearest declines in compactness. Its Reock score falls from 0.28 under the 2022 Map to 0.21 under the 2026 Map, and its Polsby-Popper score falls from 0.13 to 0.09. Its perimeter also increases from 446.5 miles to 986.5 miles, meaning that the district's perimeter more than doubles under the 2026 Map. That is consistent with a district that becomes substantially more elongated and spatially stretched. In fact, District 5 looks like a long, grasping claw reaching across the state, with narrow extensions that appear to be designed to scoop up select areas rather than follow natural boundaries. Substantively, the 2026 version of District 5 stretches from Shelby County to Williamson County, making it one of the most geographically extended districts in either plan.⁵
39. District 9 also becomes less compact under the 2026 Map. Its Reock score declines from 0.29 to 0.17, while its perimeter rises from 290.0 miles to 754.8 miles. Put differently, the perimeter of District 9 rises to more than two and a half times its 2022 length. Although its Polsby-Popper score increases slightly from 0.12 to 0.14, that modest change does not undermine the broader point suggested by the Reock score and perimeter measure: The district becomes much more geographically extended, stretching from Shelby County to Williamson and Rutherford Counties in central Tennessee. Along with District 5, District 9 is among the most stretched districts under any 2022 or 2026 configuration, and the two stand apart from the rest in their geographic reach, resembling

⁵ Notably, only 134,860 of its total population (17.6%) is drawn from 2022 District 5. The remainder is drawn from the following 2022 districts: 28.3% (217,129 people) from District 7, 22.2% (170,229 people) from District 8, and 32.0% (245,653 people) from District 9.

a pair of tongs pinching the southwest corner of the state, with the city of Memphis caught at the grip point. Under the 2022 Map, District 9 had the smallest perimeter as it was contained within Shelby and Tipton Counties.⁶

40. District 8 also becomes less compact under the 2026 Map. Its Reock score drops from 0.58 to 0.35, and its Polsby-Popper score declines from 0.29 to 0.20. Although its perimeter decreases from 635.7 miles to 558.5 miles, both compactness scores still show a substantial deterioration in shape. In other words, even with a somewhat shorter perimeter, the 2026 version of District 8 is less spatially efficient and less compact than its 2022 counterpart.⁷
41. Districts 3, 4, and 6 show more mixed changes than Districts 5, 8, and 9. District 3's Reock score declines slightly (0.34 to 0.32), but its Polsby-Popper score improves (0.15 to 0.20) and its perimeter decreases (577.3 to 481.3 miles). District 4 becomes more compact on both measures, with Reock increasing from 0.27 to 0.43 and Polsby-Popper increasing from 0.19 to 0.25, while its perimeter declines from 650.9 to 463.3 miles. District 6 shows only modest change overall, with small declines in Reock (0.37 to 0.30) and Polsby-Popper (0.25 to 0.24) and a slight perimeter decrease (555.9 to 551.7 miles). Districts 1 and 2 have the same compactness scores as they were not changed between the 2022 and 2026 Maps.
42. At the plan-wide level, the average Reock score declines from 0.36 under the 2022 Map to 0.32 under the 2026 Map, while the average Polsby-Popper score remains constant in both maps. The average district perimeter also increases from 511.4 miles under the 2022 Map to 565.7 miles under the 2026 Map. These averages indicate that, overall, the 2026 Map is comparatively less compact than the 2022 Map. The decline, however, is not uniform across districts and is largely driven by significant changes that were made to the 2022 boundaries of District 9 in the areas of Memphis and Shelby County, which resulted in significant spillover effects into parts of central Tennessee.

F. Comparative County, Municipal, and VTD District Split Analyses

43. Analysis of county, municipal, and VTD splits are a consideration in redistricting because maintaining existing political boundaries is recognized as a traditional redistricting principle.⁸ These jurisdictions often reflect established communities of interest and dividing them across districts can weaken those communities' collective electoral voice.

⁶ 2026 District 9 retains only 31.7% (243,197 people) of the total population of 2022 District 9. The remainder of 2026 District 9 is drawn from other 2022 districts: 26.8% (205,603 people) from District 4, 22.7% (174,247 people) from District 5, 2.1% (16,232 people) from District 7, and 16.7% (128,593 people) from District 8.

⁷ 2026 District 8 retains 61.1% (469,049 people) of the total population of 2022 District 8. The remainder of 2026 District 8 is drawn from other 2022 districts: 36.3% (279,021 people) from District 9 and 2.6% (19,801 people) from District 7.

⁸ See *supra* note 4.

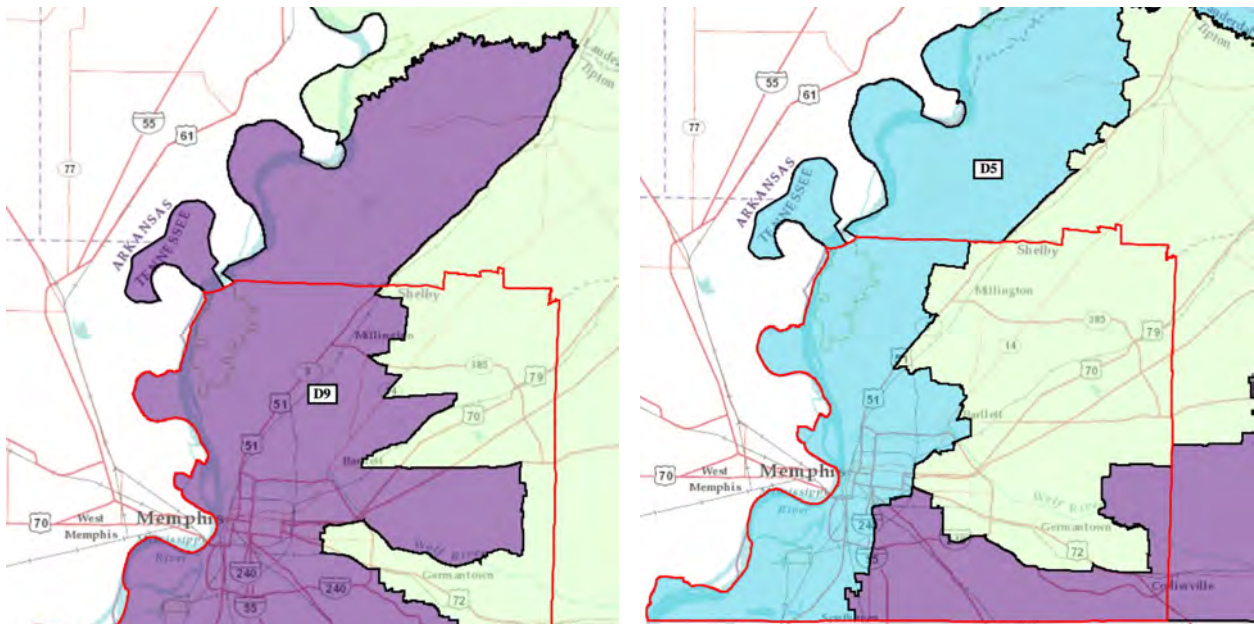
44. For each map, I first identified every county, municipality, and VTD that was divided among more than one congressional district. I then counted how many counties, municipalities, and VTDs were split in this way.
45. I also calculated county-district, municipal-district, and VTD-district splits by counting the number of districts to which each split unit was assigned and summing those counts within each category. Under this approach, a unit split between two districts contributes 2, and a unit split between three districts contributes 3. For example, if one county is split across three districts and four other counties are each split across two districts, the total county-district splits equal 11. By contrast, total county splits count only how many counties are split at all, with each split county counted once regardless of the number of districts involved. The same logic applies to municipalities and VTDs: the total splits measure counts split units, while the district-splits measure counts total district assignments across those split units.
46. Table 6 reports my analyses of total county and county-district splits between the 2022 and 2026 Maps. It also identifies the specific counties split in each Map and the number of districts into which each county is divided.

Table 6: Total County and County-District Splits by Map

Criteria	2022 Map	2026 Map
Total County Splits	10	12
Total County-District Splits	21	26
Benton County Split Across	2 Districts	0
Campbell County Split Across	2 Districts	2 Districts
Davidson County Split Across	3 Districts	3 Districts
Fayette County Split Across	0	2 Districts
Jefferson County Split Across	2 Districts	2 Districts
Maury County Split Across	0	2 Districts
Montgomery County Split Across	0	2 Districts
Rhea County Split Across	0	2 Districts
Rutherford County Split Across	0	2 Districts
Scott County Split Across	2 Districts	0
Shelby County Split Across	2 Districts	3 Districts
Sumner County Split Across	0	2 Districts
Tipton County Split Across	2 Districts	2 Districts
Warren County Split Across	2 Districts	0
Williamson County Split Across	2 Districts	2 Districts
Wilson County Split Across	2 Districts	0

47. The results show that the 2026 Map increases county fragmentation relative to the 2022 Map. The number of split counties rises from 10 to 12, while total county-district splits rise from 21 to 26. In other words, the 2026 plan not only splits more counties overall, but also divides counties across districts more extensively once they are split.
48. A particularly notable change is visible in Shelby County. A portion of Shelby County was divided under the 2022 Map because it has more population than the ideal population size of a Congressional district (929,744 vs. 767,871), but in 2026 it is split across three districts. Shelby County is the only county that was split in 2022 and then assigned to a higher number of districts in 2026.
49. Figure 4 provides a side-by-side visual comparison of Shelby County's congressional divisions under the 2022 and 2026 Maps, showing the additional split in the 2026 Map. Shelby County's boundary is outlined in red. As shown in the left panel, under the 2022 Map, most of Shelby County (purple) is contained within District 9 (about 79.3% of its population), with the remainder (light green) in District 8. In contrast, the right panel shows that under the 2026 Map, Shelby County is split three ways among Districts 5, 8, and 9, with the dividing lines meeting near Poplar and Union Avenues in Memphis.

Figure 4: Shelby County District Divisions, 2022 Map (Left Panel) and 2026 Map (Right Panel)



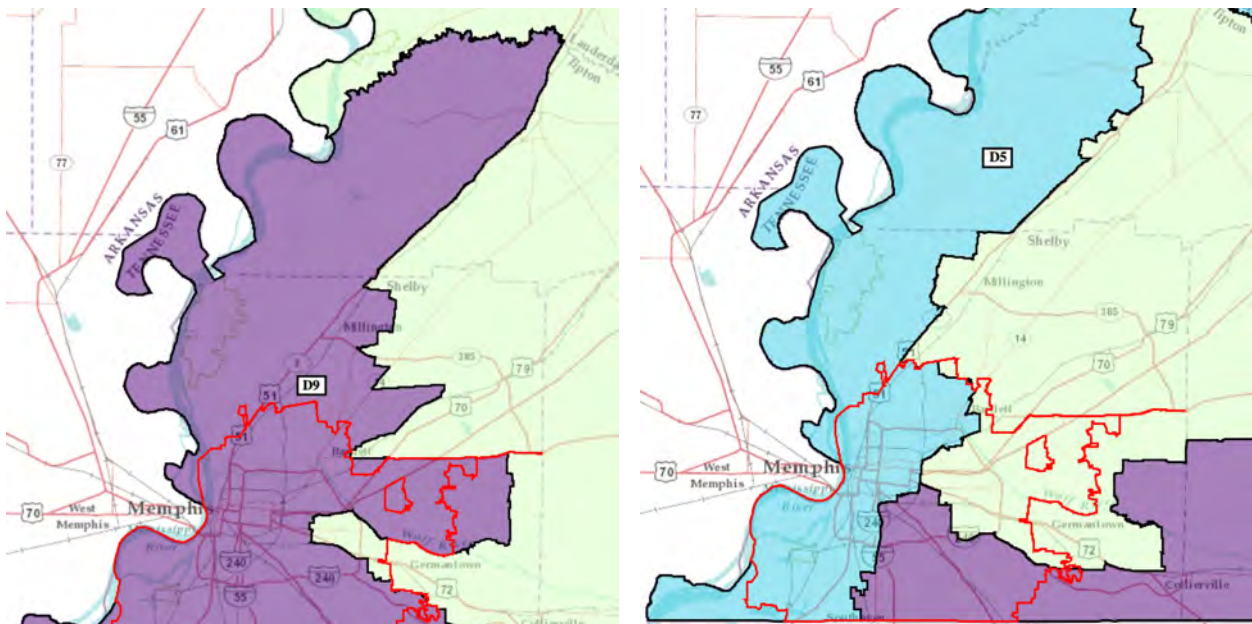
50. Table 7 reports the results of total municipal and municipal-district splits between the 2022 and 2026 Maps and identifies the specific municipalities split in each Map as well as the number of districts into which each municipality is divided.

Table 7: Total Municipal and Municipal-District Splits by Map

Criteria	2022 Map	2026 Map
Total Municipal Splits	31	36
Total Municipal-District Splits	63	74
Atoka Split Across	2 Districts	2 Districts
Bartlett Split Across	2 Districts	0
Bean Station Split Across	2 Districts	2 Districts
Belle Meade Split Across	0	2 Districts
Berry Hill Split Across	0	2 Districts
Brentwood Split Across	2 Districts	2 Districts
Brighton Split Across	2 Districts	2 Districts
Camden Split Across	2 Districts	0
Clarksville Split Across	0	2 Districts
Collierville Split Across	2 Districts	2 Districts
Columbia Split Across	0	2 Districts
Covington Split Across	2 Districts	0
Eagleville Split Across	2 Districts	2 Districts
Enville Split Across	0	2 Districts
Franklin Split Across	2 Districts	2 Districts
Gallatin Split Across	0	2 Districts
Germantown Split Across	0	2 Districts
Goodlettsville Split Across	2 Districts	2 Districts
Greenville Split Across	2 Districts	0
Harriman Split Across	0	2 Districts
Hendersonville Split Across	0	2 Districts
Huntsville Split Across	2 Districts	0
Kenton Split Across	0	2 Districts
La Follette Split Across	2 Districts	2 Districts
La Vergne Split Across	0	2 Districts
Lakeland Split Across	2 Districts	0
Lebanon Split Across	2 Districts	0
McKenzie Split Across	0	2 Districts
Memphis Split Across	2 Districts	3 Districts
Milledgeville Split Across	0	2 Districts
Millersville Split Across	2 Districts	0
Millington Split Across	0	2 Districts
Mount Juliet Split Across	2 Districts	0
Nashville-Davidson Metro Split Across	3 Districts	3 Districts
Oakland Split Across	0	2 Districts
Oliver Springs Split Across	0	2 Districts
Petersburg Split Across	2 Districts	0
Portland Split Across	2 Districts	0
Rarity Bay Split Across	2 Districts	2 Districts
Ridgetop Split Across	2 Districts	0
Rocky Top Split Across	0	2 Districts
Scotts Hill Split Across	2 Districts	0
Seymour Split Across	2 Districts	2 Districts
Silerton Split Across	0	2 Districts
Smyrna Split Across	2 Districts	2 Districts
Spring Hill Split Across	0	2 Districts
Strawberry Plains Split Across	2 Districts	2 Districts
Thompson's Station Split Across	2 Districts	2 Districts
Vonore Split Across	2 Districts	2 Districts
White House Split Across	2 Districts	0

51. The municipal split results show greater fragmentation under the 2026 Map than under the 2022 Map. Total municipal splits increase from 31 to 36, and the total municipal-district splits increase from 63 to 74. In relative terms, this is an increase in municipal disruption, consistent with weaker preservation of municipal boundaries as compared with the 2022 Map.
52. Memphis is a distinct case among divided municipalities statewide. Like Shelby County in the county-split analysis, Memphis is the only municipality that was divided under the 2022 Map and then split an additional time under the 2026 Map. Figure 5 provides a side-by-side visual comparison of Memphis's district divisions under the 2022 and 2026 Maps, illustrating this added split. The Memphis city boundary is outlined in red.
53. As shown in the left panel, under the 2022 Map, nearly all of Memphis (purple) is contained in District 9, with only a small portion in District 8 (light green), representing only 5.40% (34,375) of Memphis's total population. In contrast, the right panel shows that under the 2026 Map, Memphis is split three ways among Districts 5, 8, and 9, with the dividing lines meeting near Poplar and Union Avenues.

Figure 5: Memphis District Divisions, 2022 Map (Left Panel) and 2026 Map (Right Panel)



54. Table 8 reports total VTD splits and VTD-district splits under the 2022 and 2026 Maps and identifies the specific VTDs split in each plan, including the number of districts to which each split VTD is assigned.

Table 8: Total VTD and VTD-District Splits by Map

Criteria	2022 Map	2026 Map
Total VTD Splits	65	82
Total VTD-District Splits	130	165

55. The results show greater VTD fragmentation under the 2026 Map. Total VTD splits increase from 65 to 82, and total VTD-district splits increase from 130 to 165. In other words, the 2026 plan both splits more VTDs and creates more total district assignments across split VTDs, indicating less preservation of VTD boundaries than in the 2022 Map.

G. Distribution of Shelby County and City of Memphis BVAP Across 2022 and 2026 Map Districts

56. As previously shown, District 9 underwent dramatic restructuring between the 2022 and 2026 Maps. The new configuration is nearly unrecognizable from its predecessor: Apart from a small, southwestern corner, virtually every part of the original District 9 was altered. The 2026 District 9 retains only 180,725 residents (23.5%) of the 2022 District 9's population, meaning that 76.5% of the district's prior population was moved into different congressional districts.
57. The centerpiece of this sweeping reconfiguration was the fragmentation of both Shelby County and the City of Memphis, communities that had been heavily concentrated within the original District 9. Notably, Shelby County is the only county in the state that was divided in the 2022 Map and then subject to an additional division in the 2026 Map. Similarly, Memphis is the only municipality with a division under the 2022 Map that experienced an additional split in 2026.
58. As previously noted, Shelby County's population of 929,744 exceeds Tennessee's ideal congressional district population of 767,871, necessitating a split between districts. Under the 2022 Map, this split was confined to two districts: District 8 contained 20.7% of the county's VAP, while District 9 contained 79.3%. With respect to BVAP, District 8 contained only 4.0% of Shelby County's total BVAP (14,230 people), while District 9 contained 96.0% (342,447 people).
59. Under the 2026 Map, Shelby County remains split but now divided roughly into thirds across *three* districts. The distribution of BVAP changed substantially: District 5 now contains 33.1% of Shelby County's total BVAP (117,967 people), District 8 contains 26.7% (95,076 people), and District 9 contains 40.3% (143,634 people).⁹ This represents a significant departure from the 2022 configuration, where BVAP was heavily concentrated in a single district as a function of keeping Memphis nearly whole within a single district.

⁹ Another way to examine the impact of this three-way division is to calculate Shelby County's BVAP contribution to each district's total BVAP. Shelby County accounts for 73.8% (117,967) of District 5's total BVAP, 62.0% (95,076) of District 8's total BVAP, and 79.6% of District 9's total BVAP (143,634).

60. The city of Memphis, with a total population of 633,104 and a Black population of 393,978, was kept almost entirely whole within District 9 under the 2022 Map. Only a small portion—5.60% of the city’s total VAP (27,113 people)—was in District 8. Correspondingly, 94.4% of the city’s BVAP was within the boundaries of 2022 District 9.
61. Under the 2026 Map, Memphis is split among three districts. Districts 5 and 9 each received a nearly identical share of the city’s total BVAP: District 5 contains 39.7% of Memphis’s BVAP (115,383 people) and District 9 contains 39.8% (115,635 people)—a difference of just 252 BVAP. District 8 received the remaining 20.5% (59,499 people). The near-perfect parity in BVAP between Districts 5 and 9 is striking, effectively bisecting Memphis’s Black voting-age population with extraordinary precision and allocating the remainder to District 8.

H. Racially Polarized Voting

62. To assess the presence or absence of RPV, I examined all available contested,¹⁰ statewide, general election contests from 2016 through 2024. Statewide general contests provide uniform precinct-level coverage across the state, unlike regional contests that may omit certain precincts and produce incomplete or less comparable results across different district boundaries, or primaries in which contests are often uncontested or not all voters cast ballots for the same candidates. For these reasons, such contests allow for a more complete comparative analyses across alternative district configurations.
63. RPV is generally present when racial minority voters (e.g., Black voters) support one candidate while racial majority voters (e.g., White voters) support different candidates. Put another way, RPV exists when candidate preferences diverge across *racial* groups. If both minority and majority voters primarily support the same candidate in a contest, that contest does not show RPV. In contests with more than two candidates, the same concept applies by evaluating which candidate receives the plurality or majority support within each group.
64. Where RPV is present, bloc voting by the majority racial group may defeat candidates preferred by minority voters. For example, if White voters vote cohesively against the candidates preferred by Black voters, that voting pattern can limit Black voters’ ability to elect their candidates of choice.
65. Because voting is by secret ballot, individual-level race and vote choice are not directly observable in public election returns. As a result, racial voting patterns must be estimated using statistical inference based on aggregate election and demographic data. Analysts typically examine a range of available election contests to form conclusions about RPV patterns.

¹⁰ Elections must be contested to determine the voting preferences of different racial or ethnic groups.

66. For this analysis of the 2022 and 2026 Tennessee congressional maps, I estimated vote choice by race using two state-of-the-art ecological inference methods.¹¹ Both methods use precinct- or VTD-level relationships between demographic composition and candidate vote shares to infer how different racial groups voted.
67. The first method is King's iterative EI approach,¹² which is commonly used in two-group, two-candidate settings. Developed by Professor Gary King, this approach improved on older ecological regression methods by using maximum likelihood estimation ("MLE")¹³ together with precinct-specific logical bounds.¹⁴ Those bounds are informative because they limit the plausible range of support for each candidate in each precinct based on observed totals.
68. By contrast, ecological regression relies on a strong constancy assumption, namely that race-specific voting behavior changes linearly and similarly across precincts. In practice, that assumption is often unrealistic. EI methods were designed in part to avoid that limitation by using more of the information contained in the data.
69. The second method I used is EI rows-by-columns (RxC), a hierarchical Bayesian model¹⁵ that estimates support for multiple candidates and multiple racial groups

¹¹ "Ecological inference is the process of using aggregate (*i.e.*, ecological) data to infer discrete individual-level relationships of interest when individual-level data are not available. Ecological inferences are required in political science research when individual-level surveys are unavailable (*e.g.*, local or comparative electoral politics), unreliable (racial politics), insufficient (political geography), or infeasible (political history). They are also required in public policy (*e.g.*, for applying the Voting Rights Act) and other academic disciplines ranging from epidemiology and marketing to sociology and quantitative history." King, G. and Roberts, M., 2012, *EI: a (n R) program for ecological inference*, Harvard University, at 2.

¹² King, G., 2013, *A Solution to the Ecological Inference Problem*, Princeton University Press.

¹³ To simplify, MLE creates a model that represents different possible scenarios of how Black and White voters might have voted and calculates how likely each one is, given the data. It then chooses the combination that has the highest likelihood (*i.e.*, the one that best matches the observed data).

¹⁴ The method of bounds is a technique used within ecological inference to establish the range of possible values (bounds) for individual-level proportions given aggregate data. These bounds are useful for understanding the potential variability in voter behavior within the constraints of the aggregated data. To illustrate, consider a precinct with 100 voters: 70 Black and 30 White. If Candidate A receives 80 votes, then at least 50 Black voters must have supported Candidate A, even if all 30 White voters did so. At most, all 70 Black voters could have supported Candidate A. EI explicitly incorporates this bounded information across precincts; traditional ecological regression does not.

¹⁵ Rosen, O., Jiang, W., King, G. and Tanner, M.A., 2001, *Bayesian and frequentist inference for ecological inference: The $R \times C$ case*, *Statistica Neerlandica*, 55(2), at 134–156. The Bayesian approach combines the likelihood of the observed data with prior distributions for the parameters. A prior distribution represents researcher's beliefs or knowledge about a parameter before observing the data. The EI RxC method is a general-purpose model in that it does not impose strong assumptions about the relationship between voters' race and their candidate preferences. Specifically, the model uses a 50-50 prior, meaning it begins with no presumption that any racial group favors one candidate over another. The posterior estimates of voting behavior are therefore driven primarily by the observed precinct-level data rather than by the analyst's prior knowledge or assumptions.

simultaneously. Whereas iterative EI runs a sequence of 2-by-2 estimations, RxC fits one joint model across rows (candidates) and columns (racial groups). Both approaches are grounded in the same ecological inference framework and are widely used in RPV analyses.

70. In operational terms, both methods require the same core precinct- or VTD-level inputs: racial composition, candidate vote shares, and total ballots cast in the contest. Comparative evaluations across two-candidate and multi-candidate settings generally find that iterative EI and RxC produce *substantively* similar conclusions about RPV patterns.¹⁶
71. I implemented both methods using the peer-reviewed, open-source R package *eiCompare*,¹⁷ and estimated race-specific candidate support with both iterative EI and RxC. Election returns were compiled from official, publicly available sources through the Redistricting Data Hub,¹⁸ and demographic inputs are based on 2020 Decennial Census VAP data aggregated up from Census blocks to precincts/VTDs.¹⁹
72. I begin with reporting racially polarized voting patterns in District 9 of the 2022 Map, using the Iterative EI estimates shown in Figure 6.
73. The left side of the figure lists each contest by election year and office, with candidate pairings shown for each race. The two color-coded panels report estimated vote choice for candidates by voters' race: the gold panel reports White voters' candidate support and the green panel reports Black voters' candidate support. Bars show point estimates, and the interval markers at the bar ends show 95% confidence credible intervals, and for any RxC models the credible intervals. Point-estimate percentages are labeled at the bar ends for readability.
74. The 2024 contests show stark polarization. In the presidential race, White voters are estimated to support Trump at 70.1% and Harris at 27.1%, while Black voters are estimated to support Harris at 95.9% and Trump at 3.1%. In the 2024 Senate contest, White voters are estimated to support Blackburn at 69.9% and Johnson at 27.6%, while Black voters are estimated to support Johnson at 92.6% and Blackburn at 4.8%.

¹⁶ Barreto, M., Collingwood, L., Garcia-Rios, S. and Oskooii, K.A., 2022, *Estimating candidate support in Voting Rights Act Cases: Comparing iterative EI and EI-RxC Methods*, *Sociological Methods & Research*, 51(1), at 271–304.

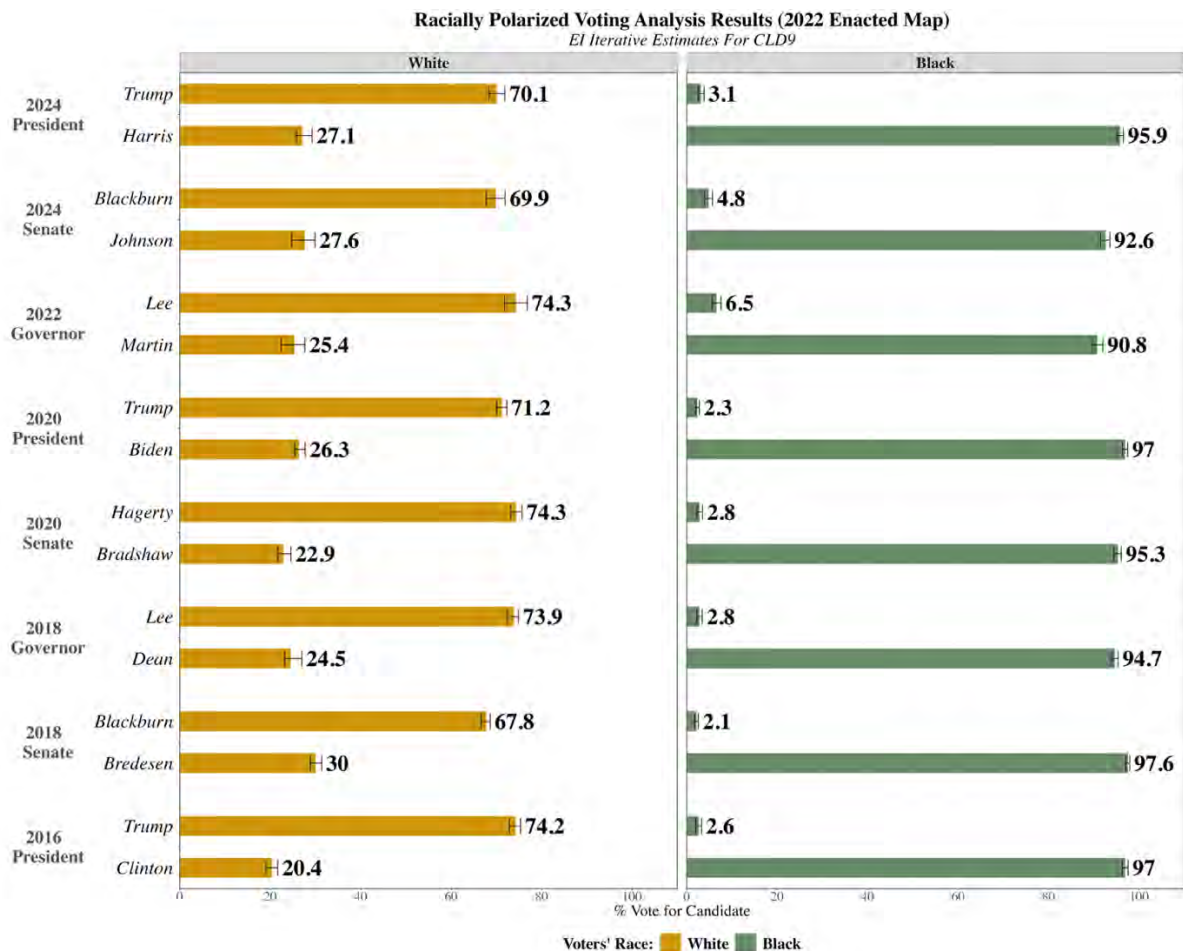
¹⁷ Collingwood, L., Oskooii, K., Garcia-Rios, S. and Barreto, M., 2016, *eiCompare: Comparing Ecological Inference Estimates across EI and EI: RxC*. R J., 8(2), at 92. R package can be downloaded from: <https://github.com/RPVote/eiCompare>

¹⁸ Election data are available here: <https://redistrictingdatahub.org/state/tennessee/>. I received 2022 data from RDH through Plaintiff's counsel.

¹⁹ Models account for demographic groups other than non-Hispanic White and Black voters. Any candidates other than the top two vote-getters are grouped into an overarching "other" category and accounted for in the models.

75. The same pattern appears in every other contest examined. In 2022 Governor, White voters are estimated at 74.3% for Lee and 25.4% for Martin, while Black voters are estimated at 90.8% for Martin and 6.5% for Lee. In 2020 President, White voters are estimated at 71.2% for Trump and 26.3% for Biden, while Black voters are estimated at 97.0% for Biden and 2.3% for Trump. In 2020 Senate, White voters are estimated at 74.3% for Hagerty and 22.9% for Bradshaw, while Black voters are estimated at 95.3% for Bradshaw and 2.8% for Hagerty. In 2018 Governor, White voters are estimated at 73.9% for Lee and 24.5% for Dean, while Black voters are estimated at 94.7% for Dean and 2.8% for Lee. In 2018 Senate, White voters are estimated at 67.8% for Blackburn and 30.0% for Bredesen, while Black voters are estimated at 97.6% for Bredesen and 2.1% for Blackburn. In 2016 President, White voters are estimated at 74.2% for Trump and 20.4% for Clinton, while Black voters are estimated at 97.0% for Clinton and 2.6% for Trump.

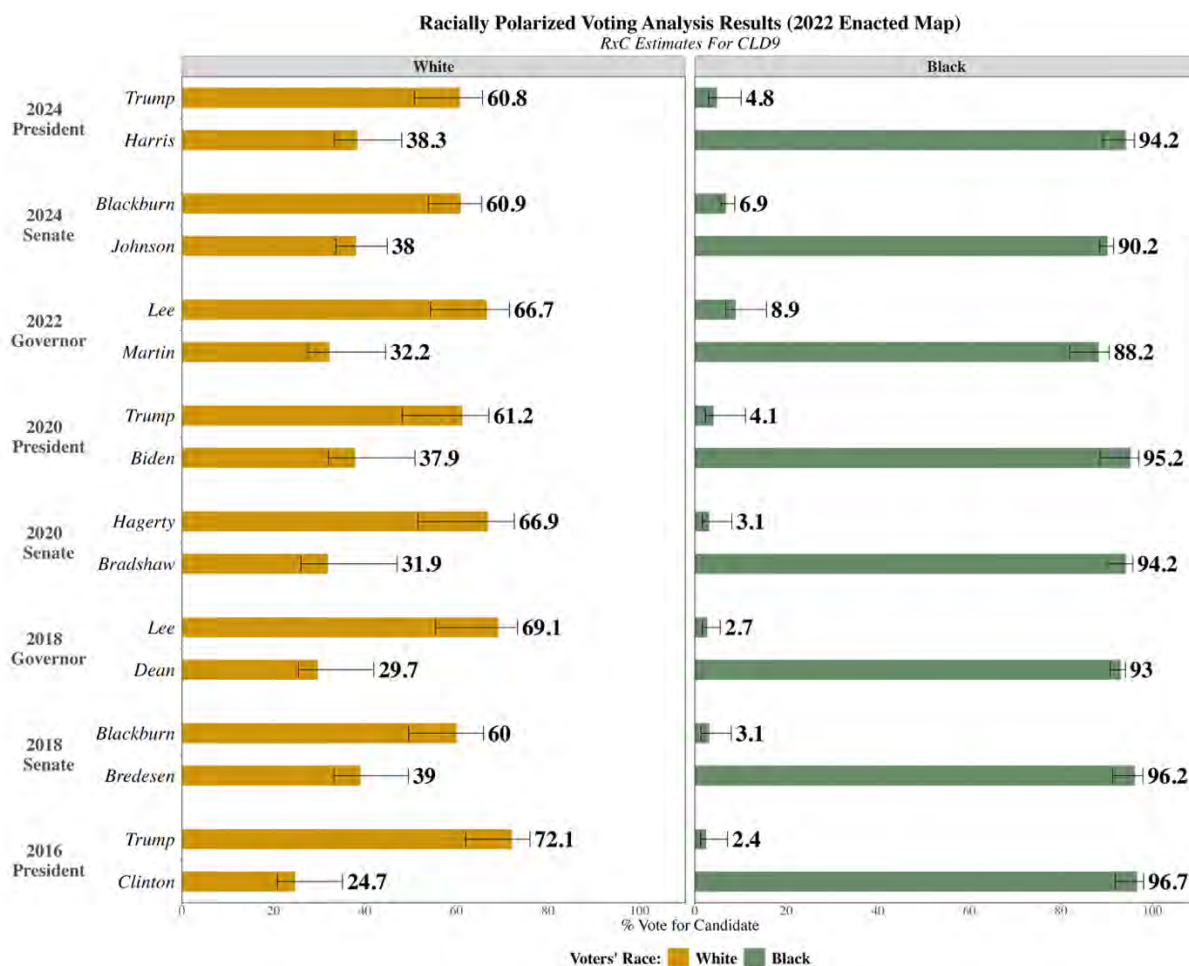
Figure 6: Iterative EI RPV Results, 2022 Enacted Map, District 9



76. Considering all eight contests together, Black support for Black-preferred candidates ranges from 90.8% to 97.6%, with an average of 95.1%. White support for Black-preferred candidates ranges from 20.4% to 30.0%, with an average of 25.5%.

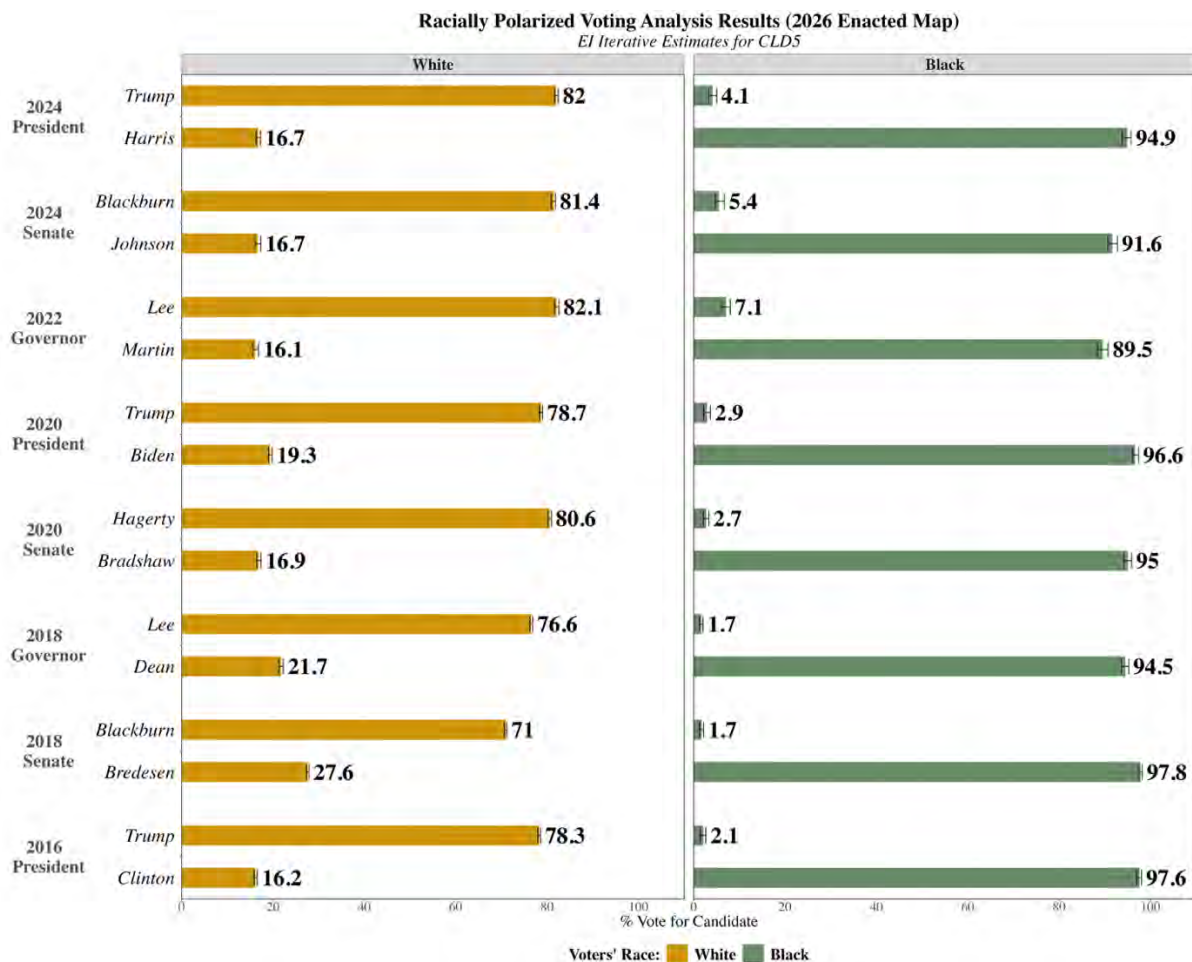
77. The race-specific gaps are large and persistent in every election shown. For Black-preferred candidates, the Black-White support differential ranges from 65.0 percentage points (2024 Senate: 92.6% vs. 27.6%) to 76.6 percentage points (2016 President: 97.0% vs. 20.4%).
78. In sum, the Iterative EI results for District 9 under the 2022 Map show consistent, high-magnitude racial polarization across presidential, senate, and gubernatorial contests from 2016 through 2024, with Black voters overwhelmingly supporting one set of candidates and White voters overwhelmingly supporting the opposing set.
79. Estimates from the RxC model, reported in Figure 7, are more conservative than those from the iterative EI model. Specifically, RxC estimates place average White support for Black-preferred candidates 8.4 percentage points higher and average Black support 1.6 percentage points lower than the iterative EI estimates. Critically, both models document substantively similar RPV patterns in District 9: Black voters consistently coalescing behind candidates consistently opposed by White voters.

Figure 7: RxC EI RPV Results, 2022 Enacted Map, District 9



80. With the adoption of the 2026 Map, the congressional districts encompassing Memphis and Shelby County—Districts 5, 8, and 9—exhibit notably different racial compositions compared to the 2022 configuration, though racial polarization remains evident across all three districts. I turn now to the Iterative EI results for these three 2026 districts.
81. Figure 8 shows clear racial polarization in District 5, though with somewhat different magnitudes than the heavily Black District 9 of 2022. In 2024 President, White voters are estimated at 82.0% for Trump and 16.7% for Harris, while Black voters are estimated at 4.1% for Trump and 94.9% for Harris. In 2024 Senate, White voters are estimated at 81.4% for Blackburn and 16.7% for Johnson, while Black voters are estimated at 5.4% for Blackburn and 91.6% for Johnson. In 2024 Senate, White voters are estimated at 81.4% for Blackburn and 16.7% for Johnson, while Black voters are estimated at 5.4% for Blackburn and 91.6% for Johnson.

Figure 8: Iterative EI RPV Results, 2026 Enacted Map, District 5

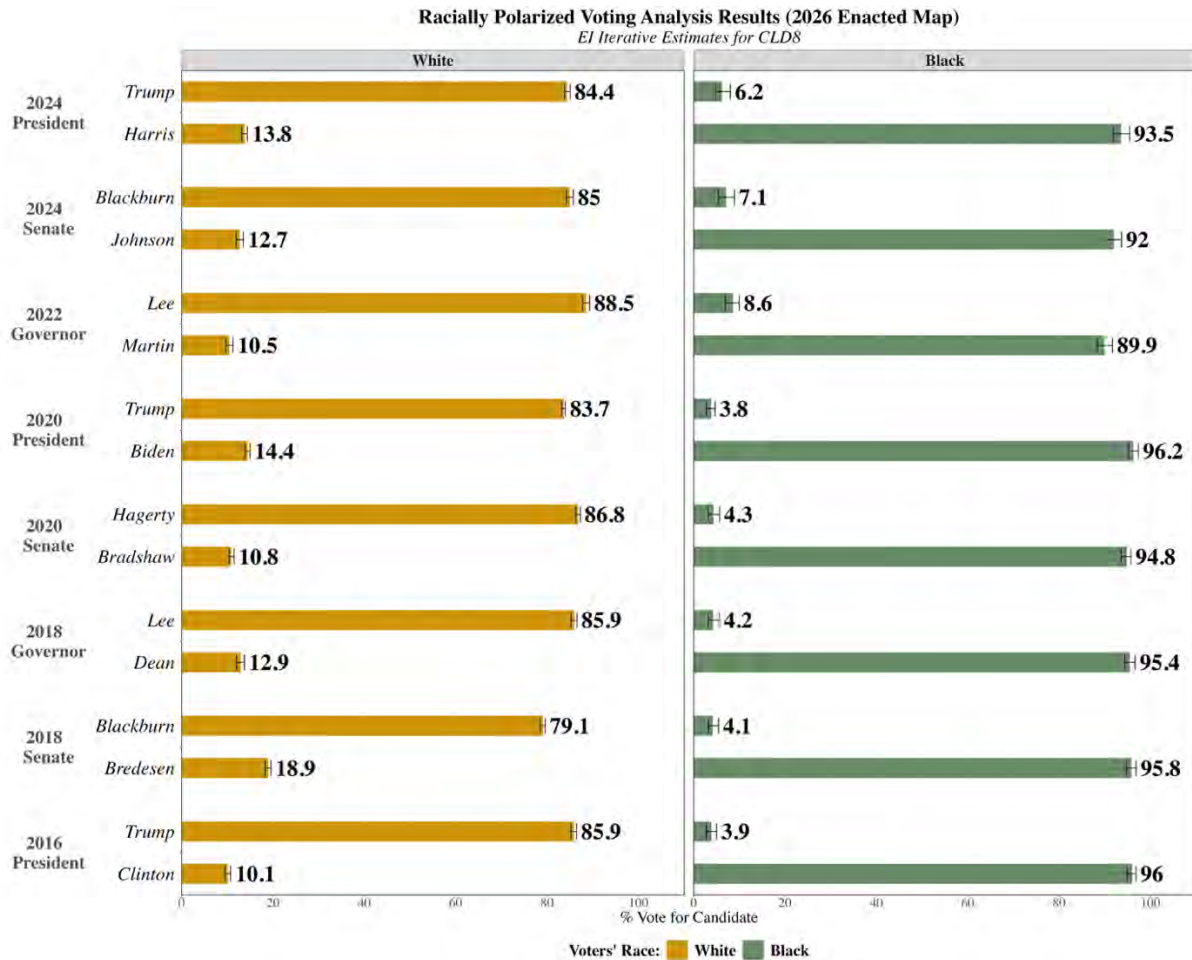


82. This pattern repeats across prior election cycles. In 2022 Governor, White voters are estimated at 82.1% for Lee and 16.1% for Martin, while Black voters are estimated at 7.1% for Lee and 89.5% for Martin. In 2020 President, White voters are estimated at 78.7% for Trump and 19.3% for Biden, while Black voters are estimated at 2.9% for Trump and 96.6% for Biden. In 2020 Senate, White voters are estimated at 80.6% for

Hagerty and 16.9% for Bradshaw, while Black voters are estimated at 2.7% for Hagerty and 95.0% for Bradshaw. In 2018 Governor, White voters are estimated at 76.6% for Lee and 21.7% for Dean, while Black voters are estimated at 1.7% for Lee and 94.5% for Dean. In 2018 Senate, White voters are estimated at 71.0% for Blackburn and 27.6% for Bredesen, while Black voters are estimated at 1.7% for Blackburn and 97.8% for Bredesen. In 2016 President, White voters are estimated at 78.3% for Trump and 16.2% for Clinton, while Black voters are estimated at 2.1% for Trump and 97.6% for Clinton.

83. Across all eight contests, Black support for Black-preferred candidates ranges from 89.5% to 97.8%, with an average of 94.7%. White support for Black-preferred candidates ranges from 16.1% to 27.6%, with an average of 18.8%.
84. The race-specific gaps are likewise large and persistent. For Black-preferred candidates, the Black-White support differential ranges from 70.2 percentage points (2018 Senate: 97.8% vs. 27.6%) to 81.4 percentage points (2016 President: 97.6% vs. 16.2%), with an average gap of 75.8 points.
85. As Figure 9 illustrates, District 8 exhibits similar polarization patterns to District 5, with somewhat higher White bloc voting. In 2024 President, White voters are estimated at 84.4% for Trump and 13.8% for Harris, while Black voters are estimated at 6.2% for Trump and 93.5% for Harris. In 2024 Senate, White voters are estimated at 85.0% for Blackburn and 12.7% for Johnson, while Black voters are estimated at 7.1% for Blackburn and 92.0% for Johnson.
86. The same pattern holds across prior cycles. In 2022 Governor, White voters are estimated at 88.5% for Lee and 10.5% for Martin, while Black voters are estimated at 8.6% for Lee and 89.9% for Martin. In 2020 President, White voters are estimated at 83.7% for Trump and 14.4% for Biden, while Black voters are estimated at 3.8% for Trump and 96.2% for Biden. In 2020 Senate, White voters are estimated at 86.8% for Hagerty and 10.8% for Bradshaw, while Black voters are estimated at 4.3% for Hagerty and 94.8% for Bradshaw. In 2018 Governor, White voters are estimated at 85.9% for Lee and 12.9% for Dean, while Black voters are estimated at 4.2% for Lee and 95.4% for Dean. In 2018 Senate, White voters are estimated at 79.1% for Blackburn and 18.9% for Bredesen, while Black voters are estimated at 4.1% for Blackburn and 95.8% for Bredesen. In 2016 President, White voters are estimated at 85.9% for Trump and 10.1% for Clinton, while Black voters are estimated at 3.9% for Trump and 96.0% for Clinton.

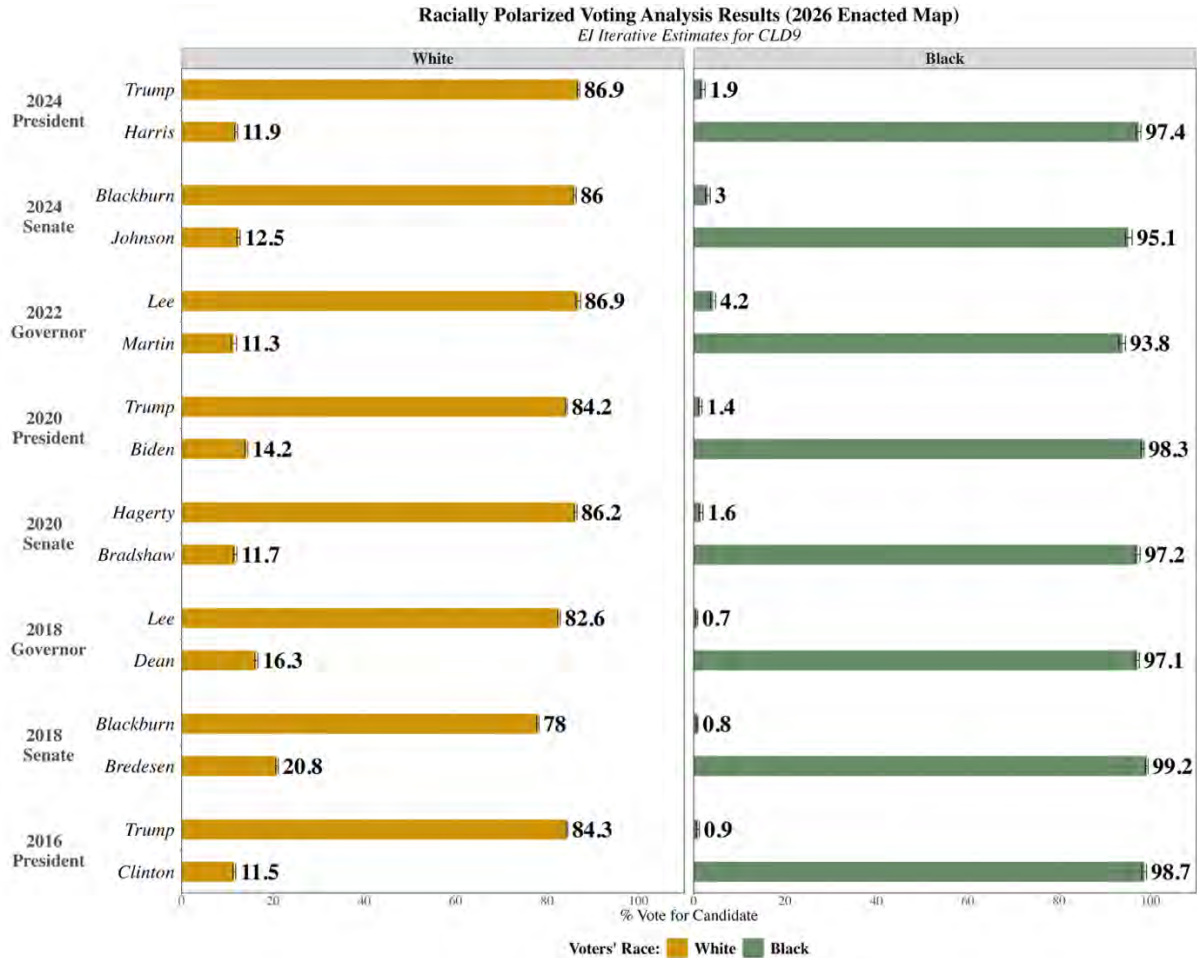
Figure 9: Iterative EI RPV Results, 2026 Enacted Map, District 8



87. Across all eight contests, Black support for Black-preferred candidates ranges from 89.9% to 96.2%, with an average of 94.2%. White support for Black-preferred candidates ranges from 10.1% to 18.9%, with an average of 13.0%.
88. The race-specific gaps are substantial and persistent across every contest. For Black-preferred candidates, the Black-White support differential ranges from 81.8 percentage points (2020 President: 96.2% vs. 14.4%) to 85.9 percentage points (2016 President: 96.0% vs. 10.1%).
89. District 9 shows the most pronounced racial polarization of the three districts, as shown in Figure 10. In 2024 President, White voters are estimated at 86.9% for Trump and 11.9% for Harris, while Black voters are estimated at 1.9% for Trump and 97.4% for Harris. In 2024 Senate, White voters are estimated at 86.0% for Blackburn and 12.5%

for Johnson, while Black voters are estimated at 3.0% for Blackburn and 95.1% for Johnson.

Figure 10: Iterative EI RPV Results, 2026 Enacted Map, District 9



90. This pattern is consistent across all prior contests. In 2022 Governor, White voters are estimated at 86.9% for Lee and 11.3% for Martin, while Black voters are estimated at 4.2% for Lee and 93.8% for Martin. In 2020 President, White voters are estimated at 84.2% for Trump and 14.2% for Biden, while Black voters are estimated at 1.4% for Trump and 98.3% for Biden. In 2020 Senate, White voters are estimated at 86.2% for Hagerty and 11.7% for Bradshaw, while Black voters are estimated at 1.6% for Hagerty and 97.2% for Bradshaw. In 2018 Governor, White voters are estimated at 82.6% for Lee and 16.3% for Dean, while Black voters are estimated at 0.7% for Lee and 97.1% for Dean. In 2018 Senate, White voters are estimated at 78.0% for Blackburn and 20.8% for Bredesen, while Black voters are estimated at 0.8% for Blackburn and 99.2% for Bredesen. In 2016 President, White voters are estimated at 84.3% for Trump and 11.5% for Clinton, while Black voters are estimated at 0.9% for Trump and 98.7% for Clinton.

91. Across all eight contests, Black support for Black-preferred candidates ranges from 93.8% to 99.2%, with an average of 97.1%. White support for Black-preferred candidates ranges from 11.3% to 20.8%, with an average of 13.8%.
92. The race-specific gaps are substantial and persistent in every contest. For Black-preferred candidates, the Black-White support differential ranges from 78.4 percentage points (2018 Senate: 99.2% vs. 20.8%) to 87.2 percentage points (2016 President: 98.7% vs. 11.5%), with an average gap of 83.3 points.
93. In sum, all three 2026 districts—5, 8, and 9—exhibit consistent, high-levels of racial polarization, with Black voters overwhelming supporting one set of candidates and White voters overwhelmingly opposing those candidates.
94. As with the 2022 Map analysis, the RxC model results, displayed in Figures 11–13, document significant racial polarization in Districts 5, 8, and 9 in the 2026 Map, even if the estimates are somewhat more conservative. White support for Black-preferred candidates is on average about 3 to 6 percentage points higher, and Black support is on average about 3 to 10 percentage points lower, compared to the iterative EI estimates. Critically, both models document substantively similar RPV patterns across Districts 5, 8, and 9: Black voters consistently coalescing behind candidates that White voters overwhelmingly oppose.

Figure 11: EI RxC RPV Results, 2026 Enacted Map, District 5

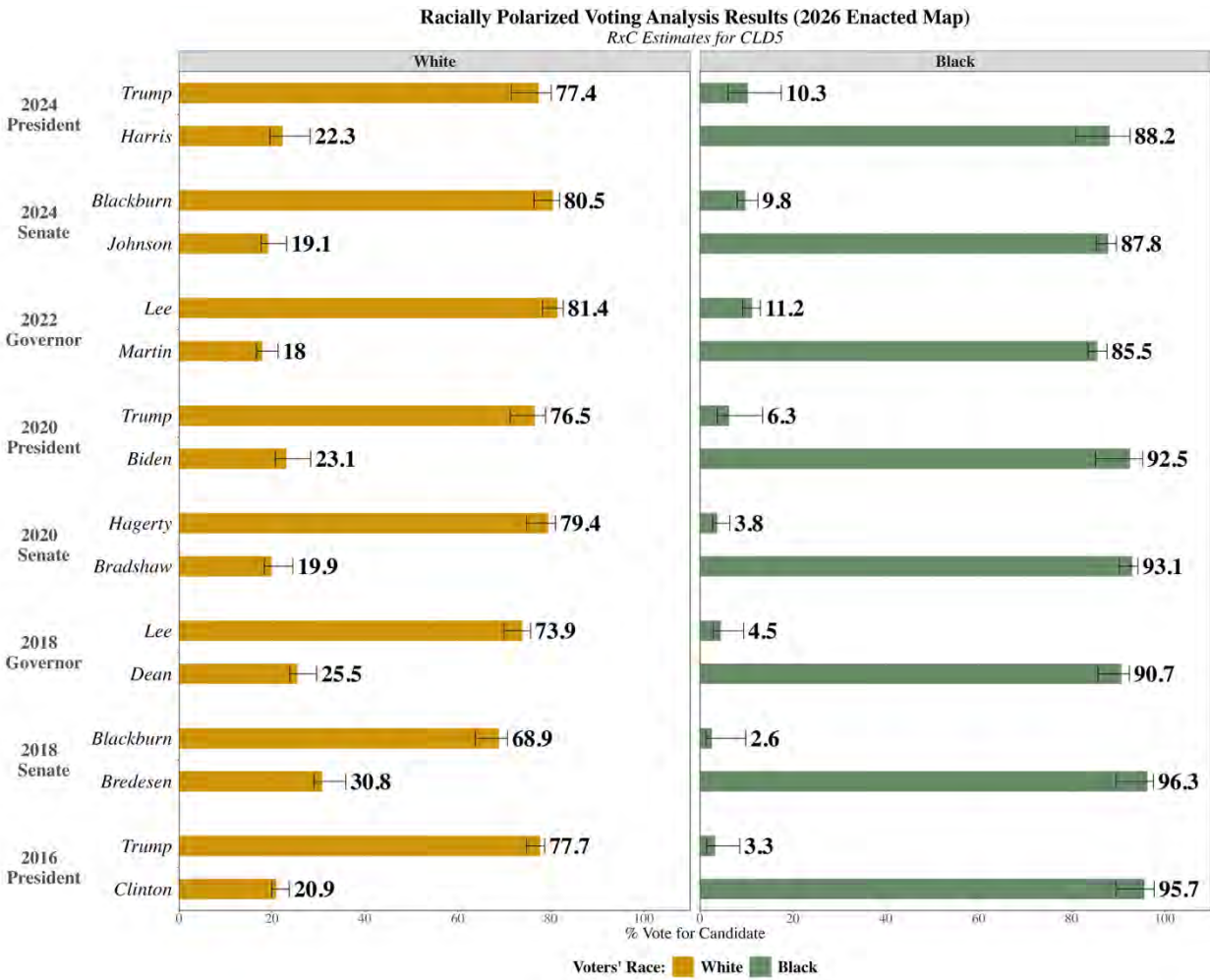


Figure 12: EI RxC RPV Results, 2026 Enacted Map, District 8

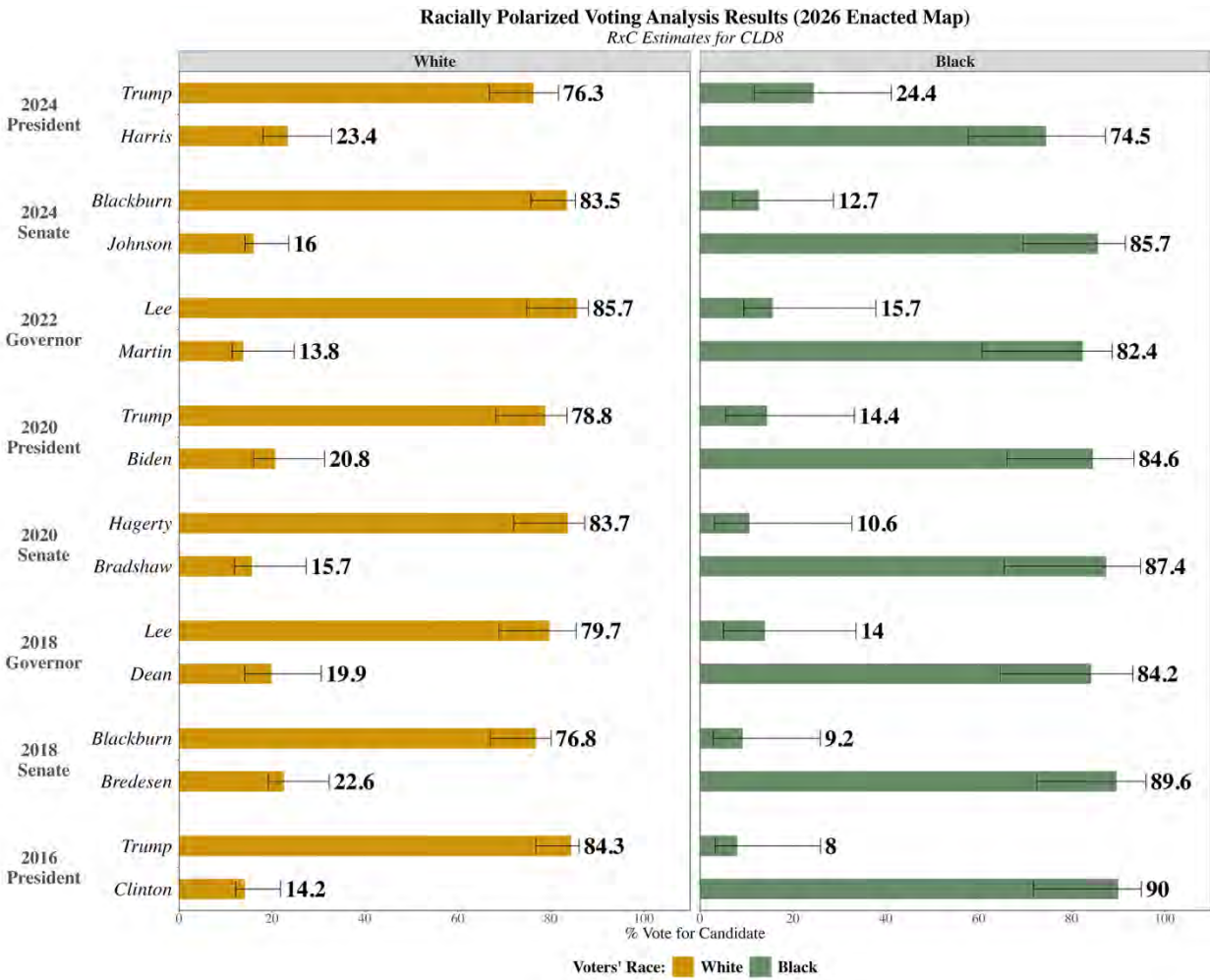
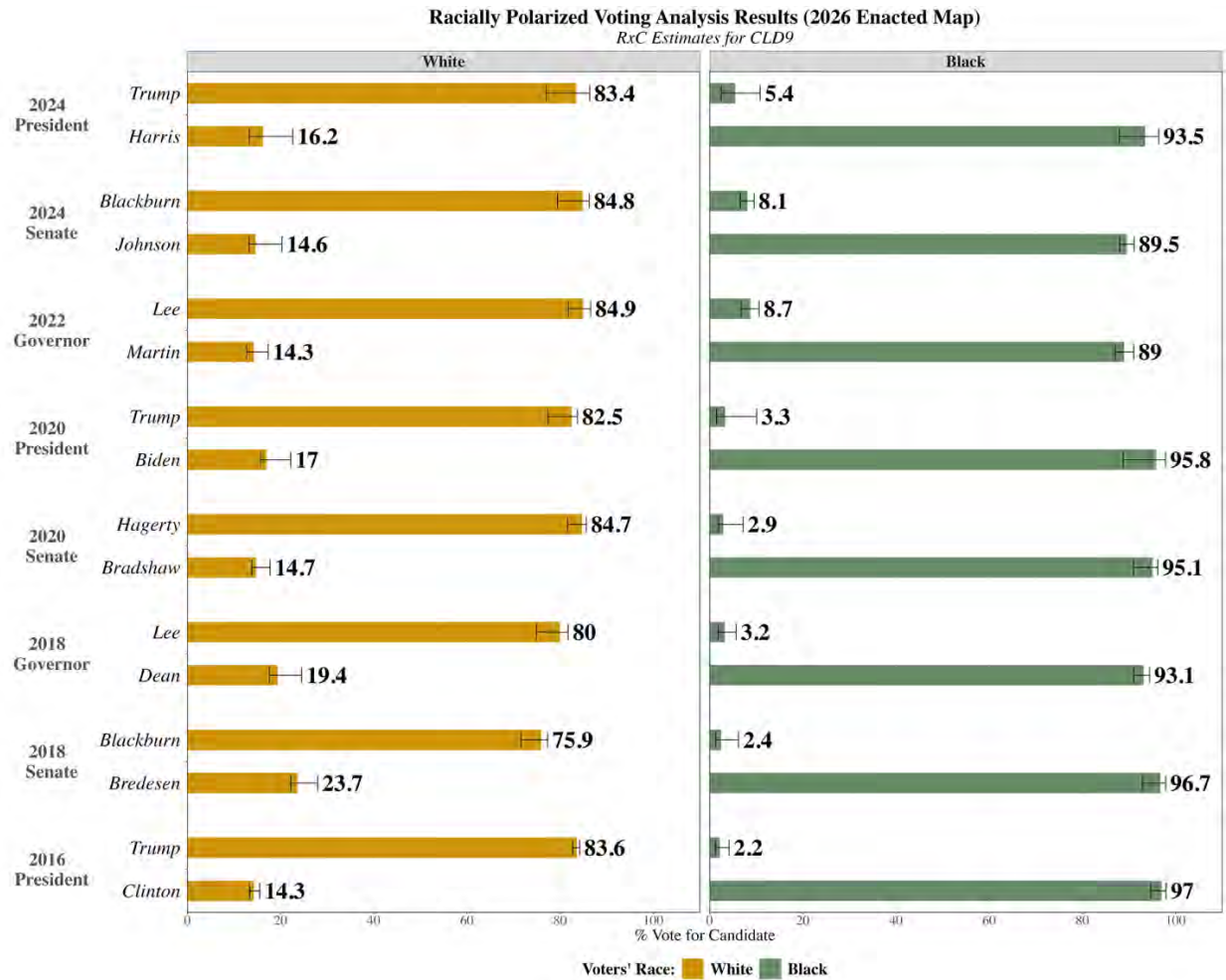


Figure 13: EI RxC RPV Results, 2026 Enacted Map, District 9



I. Performance Analysis

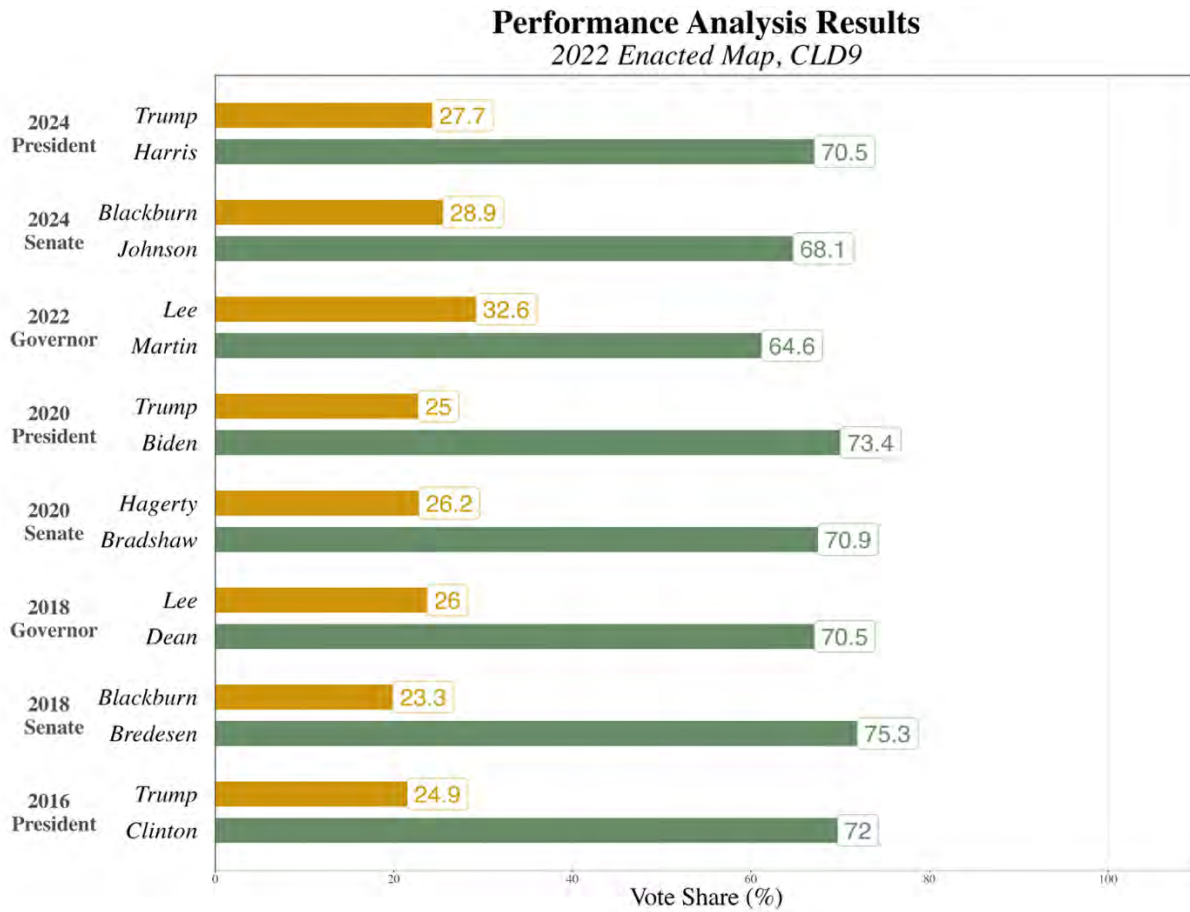
95. An electoral performance analysis is a useful way to evaluate how different candidates perform under different district boundaries, and to assess whether majority voters usually prevent minority voters from electing their preferred candidates.²⁰
96. Conducting a performance analysis generally does not require a statistical estimation method. The most important task is to correctly identify the VTDs or precincts that fall within the electoral jurisdictions of interest, such as a particular congressional district.
97. When a precinct is split between two or more districts, the analyst must allocate the votes from that precinct appropriately. This is done through a split-precinct analysis in which votes are assigned based on the VAP of the Census blocks within the precinct. This

²⁰ Another term used by scholars and the courts is called a “functional” or “effectiveness” analysis. In this report, an electoral performance analysis is interchangeable with a functional or effectiveness analysis.

approach distributes votes according to where people actually reside, down to the Census block level, rather than according to geographic area that may contain little or no population. For this analysis, VAP is typically preferable to citizen voting-age population (“CVAP”) estimates because VAP is available at the Census block level, whereas the smallest geographic unit which CVAP is reported by the U.S. Census is at the block-group level. VAP data is also derived from the Decennial Census, while CVAP data is based on the American Community Survey (“ACS”), which relies on a sample rather than a full enumeration.

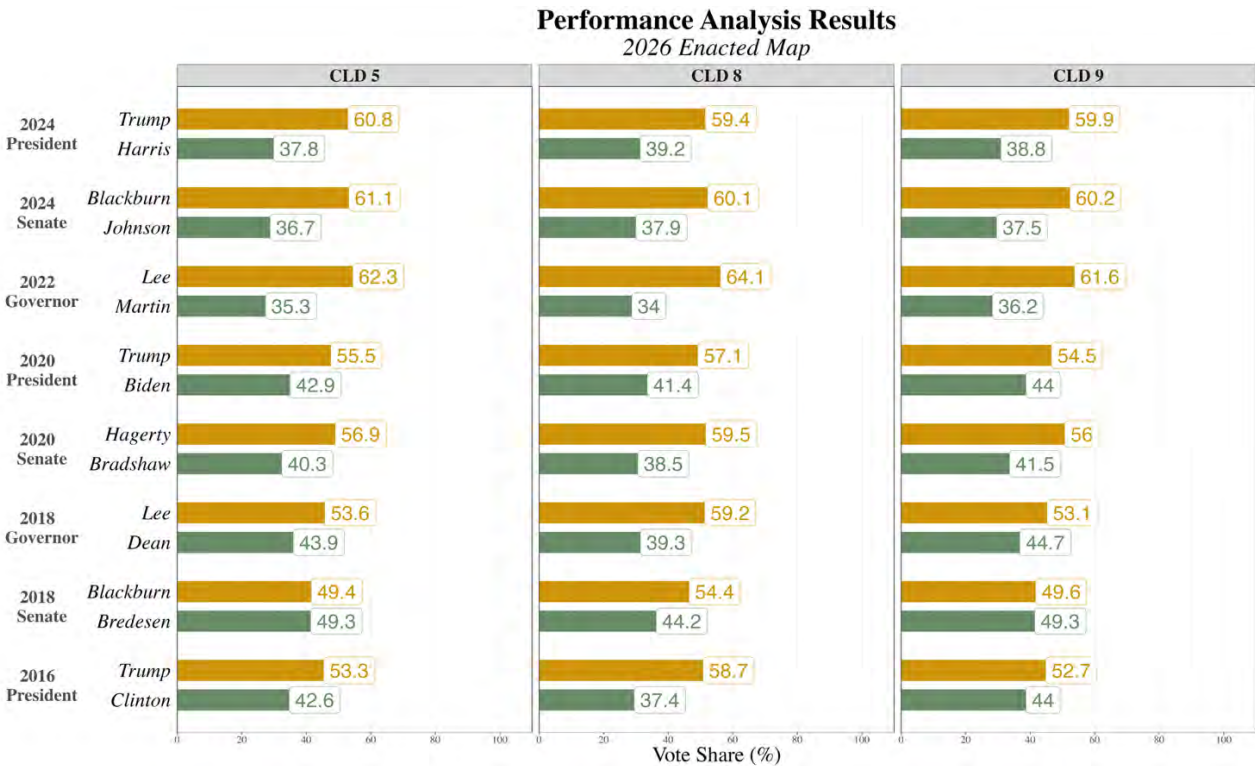
98. Once the votes in split precincts are properly allocated, the remaining task is to aggregate candidate votes within the jurisdiction of interest and calculate each candidate’s share of the total vote. In other words, the analyst totals the votes received by each candidate across all precincts in the district and then divides those totals by the overall number of votes cast to obtain vote percentages.
99. This type of analysis reconstructs prior election results under alternative district boundaries, such as the 2022 and 2026 Maps, and shows which contests result in success or defeat for the candidates preferred by, in this case, White and Black voters.
100. The electoral performance results for District 9 of the 2022 Map are displayed in Figure 14. The plot shows the actual vote share received by the top two candidates in each contest, with gold bars representing White-preferred candidates and green bars representing Black-preferred candidates. Unlike the RPV estimates discussed previously, these percentages reflect the share of votes received by each candidate within the district boundaries.
101. District 9 under the 2022 Map is a Black-majority district, and the electoral performance results reflect this: Black-preferred candidates, which were identified with the RPV analyses, were able to elect their candidates of choice in every one of the eight contests examined. Across presidential, senate, and gubernatorial races spanning 2016 through 2024, the Black-majority composition of District 9 enabled Black voters to overcome White bloc voting to elect their candidates of choice.

Figure 14: Electoral Performance Results, 2022 Enacted Map, District 9



102. In sharp contrast to the 2022 District 9, where the Black-majority composition enabled Black voters to overcome White bloc voting and elect their candidates of choice in all eight contests, no such outcome occurs in any of the three 2026 districts, as shown in Figure 15. White-preferred candidates win all eight contests in Districts 5, 8, and 9. This universal failure of Black-preferred candidates represents a complete reversal from 2022, when Black voters successfully elected their candidates of choice in each of the eight contests. By fragmenting what had been a geographically compact Black-majority district comprised of almost all of Memphis into three separate districts with much lower Black voting-age population shares, the redistricting plan effectively eliminated Black voters' ability to elect their candidates of choice.

Figure 15: Electoral Performance Results, 2026 Enacted Map, Districts 5, 8, and 9



J. Analysis of the 2022 Democratic Primary for Governor Contest

103. At the request of counsel for Plaintiffs, I examined the highly competitive, contested, biracial 2022 Democratic primary for Governor. In that contest, Jason Martin, a White candidate, narrowly defeated J.B. Smiley Jr., a Black candidate, by only 1,490 votes; a second Black candidate, Carnita Atwater, finished third. Martin received 39.4% of the statewide vote, Smiley received 38.8%, and Atwater received 21.8%.²¹ However, the results show that Smiley carried Shelby County by a wide margin²²—Tennessee’s most populous county that also has the highest concentration of Black voters in the state.

104. However, Martin decisively beat Smiley in Williamson County (82.9% WVAP; sixth most populous) and Rutherford County (67.3% WVAP; fifth most populous), both of which fall within the 2026 Map’s reconfigured districts. Notably, under the 2026 Map, District 9, as I previously documented, stretches all the way from Shelby County into Williamson and Rutherford, while District 5 also stretches deep into central Tennessee, splitting Williamson County between Districts 5 and 9.

²¹ Official election results by county can be accessed here: <https://sos-prod.tnsosgovfiles.com/s3fs-public/document/20220804DemocraticPrimarybyCounty.pdf>.

²² One thing to note is that Smiley is from Memphis and served on the Memphis City Council. Nevertheless, the EI results in the next section show that voting was still racially polarized in District 9 of the 2022 Map.

105. Furthermore, Martin defeated Smiley in all other counties west of Williamson and Rutherford but east of Madison in which Districts 5, 8, or 9 of the 2026 Map partially or fully stretch into, including Bedford, Benton, Carroll, Chester, Decatur, Giles, Hardin, Henderson, Henry, Hickman, Houston, Humphreys, Lawrence, Lewis, Lincoln, Marshall, Maury, McNairy, Montgomery, Moore, Perry, Stewart, and Wayne.
106. And except for Tipton (18.1% BVAP), Fayette (26.1% BVAP), Haywood (50.2% BVAP), and Madison (35.5% BVAP), Martin also defeated Smiley in all other counties in western Tennessee, including Crockett, Dyer, Gibson, Hardeman, Lake, Lauderdale, Obion, and Weakley.
107. Against this county-level backdrop, I next report the voting preferences of White and Black voters in the 2022 Democratic gubernatorial primary using the same EI methods applied in the previous section. I begin with results for District 9 under the 2022 Map and then turn to Districts 5, 8, and 9 under the 2026 Map. Because this contest features three candidates, I evaluate which candidate received a plurality or majority of support within each racial group.
108. Figure 16 reports iterative EI results for 2022 District 9, which includes voters in Shelby and Tipton Counties. In this three-candidate Democratic gubernatorial primary, White and Black voters showed different candidate preferences.
109. White voters in District 9 are estimated to have given Martin the largest share of their vote (44.4%), followed by Smiley (35.9%) and Atwater (21.2%). Black voters, by contrast, are estimated to have preferred Smiley (75.8%), with substantially lower support for Atwater (13.0%) and Martin (10.6%). Thus, Smiley is the Black-preferred candidate by a clear majority, while Martin is the White plurality choice.
110. The Martin-Smiley divide is substantial in this district. Estimated support for Martin is 33.8 percentage points higher among White voters than Black voters (44.4% vs. 10.6%), while estimated support for Smiley is 39.9 points higher among Black voters than White voters (75.8% vs. 35.9%). The EI RxC results reported in Figure 17, are substantively consistent with the iterative EI results.

Figure 16: Iterative EI RPV Results, 2022 Enacted Map, District 9

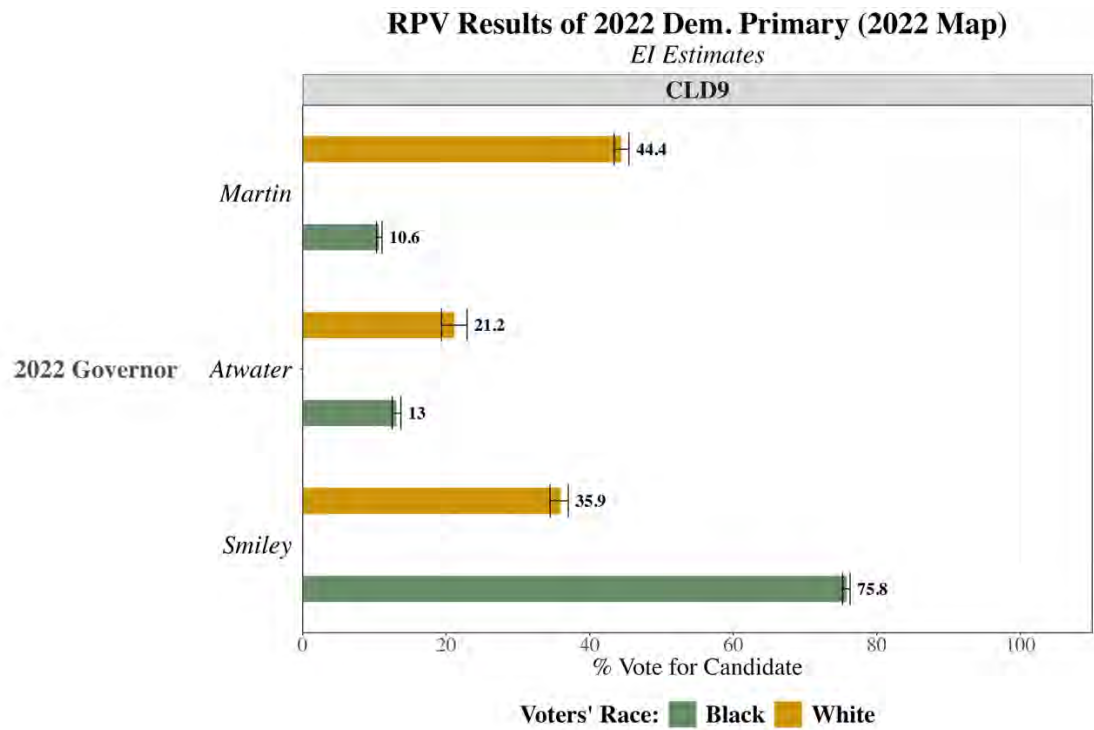
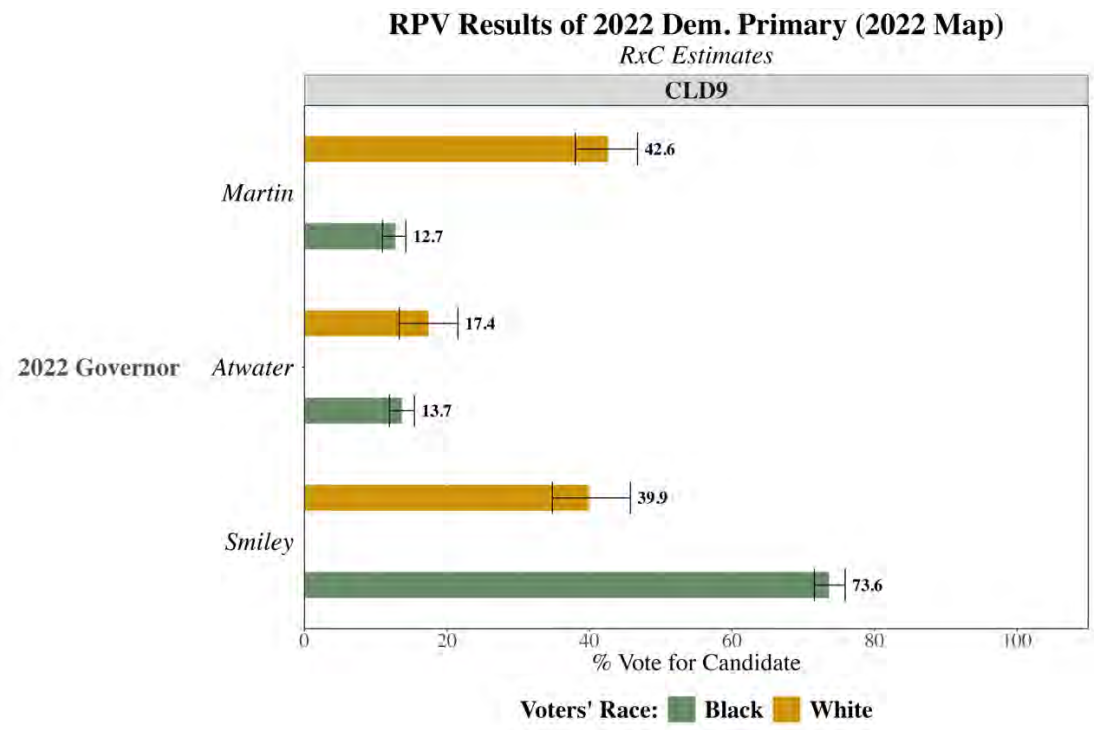


Figure 17: EI RxC RPV Results, 2022 Enacted Map, District 9



111. Figure 18 reports the same 2022 Democratic gubernatorial primary iterative EI results, but this time for Districts 5, 8, and 9 of the 2026 Map. Unlike previous plots, it presents all three 2026 districts in a single figure.
112. Across all three 2026 districts, the racial divide between Martin and Smiley is more pronounced than in 2022 District 9. White voters in each 2026 district give their largest share to Martin (57.6% in District 5, 49.6% in District 8, and 60.0% in District 9), while Black voters in each district overwhelmingly prefer Smiley (77.9%, 79.2%, and 79.5%, respectively). At the same time, Black support for Martin remains very low (8.9%, 8.7%, and 8.2%, respectively).
113. The Martin-Smiley gaps are therefore sharper in each 2026 district than in 2022 District 9. For Martin, the White-Black support gap is 48.7 points in District 5, 40.9 points in District 8, and 51.8 points in District 9 (compared to 33.8 points in 2022 District 9). For Smiley, the Black-White support gap is 59.1, 53.9, and 63.1 points (compared to 39.9 points in 2022 District 9). The RxC results reported in Figure 19, while somewhat more conservative in magnitude, again yield substantively similar conclusions.

Figure 18: Iterative EI RPV Results, 2026 Enacted Map, Districts 5, 8, and 9

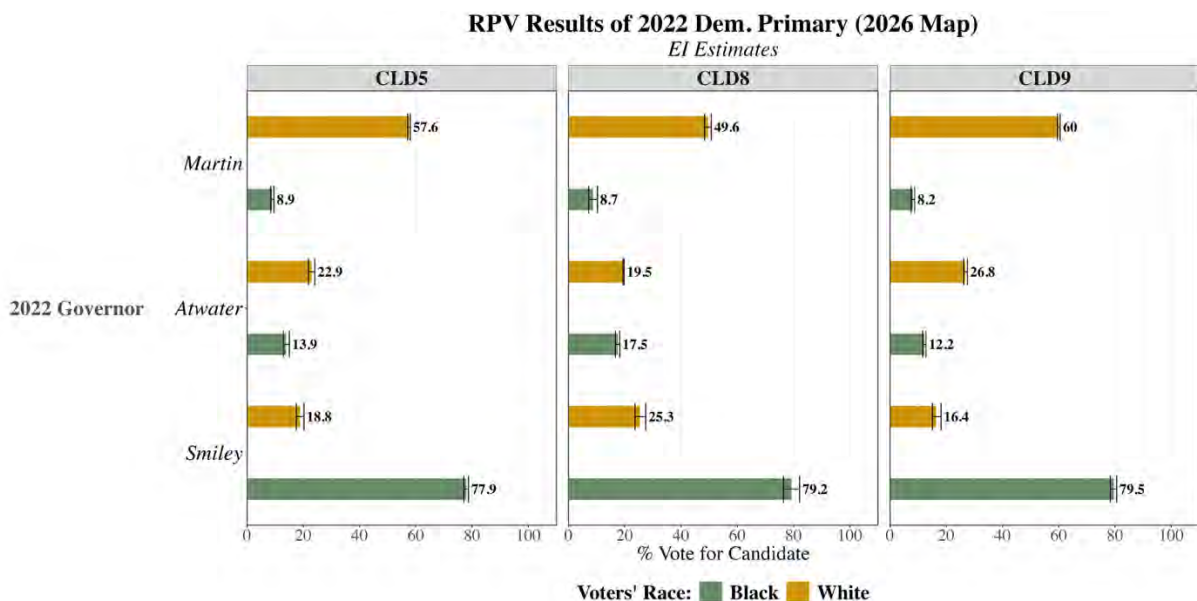
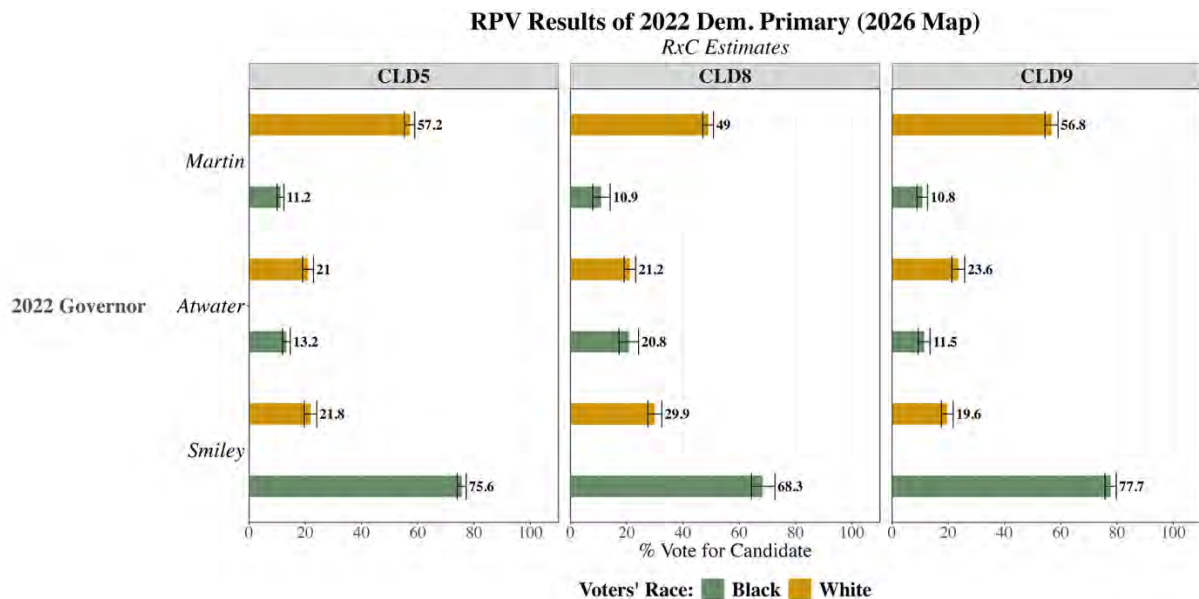


Figure 19: EI RxC RPV Results, 2026 Enacted Map, Districts 5, 8, and 9



K. Conclusion

114. My work in this matter is ongoing, and I reserve the right to modify, update, or supplement my report, particularly as additional information is made available to me.
115. Pursuant to 28 U.S.C. § 1746, I, Kassra AR Oskooii, declare under penalty of perjury that the foregoing is true and correct.

Executed by:

Kr. Oshar

Dr. Kassra A.R. Oskooii

Dated: May 12, 2025

APPENDIX A

Kassra A.R. Oskooii

Contact Information

University of Delaware
Political Science & International Relations
403 Smith Hall, 18 Amstel Ave
Newark, DE 19716

 (302) 831-2355
 oskooiik@udel.edu
 kassrao@gmail.com
 www.kassraoskooii.com

Academic Appointments

University of Delaware

Political Science & International Relations

Associate Professor

2021-Present

Assistant Professor

2016-2021

Current Faculty Affiliations:

Data Science Institute (DSI)

2023-Present

Master of Science in Data Science (MSDS)

2023-Present

Center for Political Communication (CPC)

2016-Present

Center for the Study of Diversity (CSD)

2016-Present

Education

University of Washington

Ph.D., 2016

Department of Political Science

General Fields: American Politics & Political Methodology

Specialized Field: Minority and Race Politics

University of Washington

M.A., 2013

Department of Political Science

Center for Statistics & the Social Sciences (CSSS)

Political Methodology Field Certificate (2013)

University of Washington

B.A., 2008

Major: Political Science

Minors: Human Rights and Law, Societies, & Justice

Peer-Reviewed Journal Publications

[“Bureaucratic Bias or Voter-Side Factors? Testing Competing Explanations for Racial Gaps in Vote-By-Mail Ballot Signature Rejections.”](#) *Forthcoming. Political Research Quarterly.* w/ Herndon and Rios.

[“Neighboring Groups and Political Attacks.”](#) *Forthcoming. Political Research Quarterly.* w/ Besco, Garcia-Rios, Lagodny, Lajevardi, and Tolley.

[“Anti-Muslim Policy Preferences and Boundaries of American Identity Across Partisanship.”](#) 2024. *Journal of Public Policy*, 44(3): 573-591. w/ Lajevardi, N.

[“In the Shadow of September 11: The Roots and Ramifications of Anti-Muslim Attitudes in the United States.”](#) 2024. *Advances in Political*

Psychology, 45(S1): 87-118. w/ Lajevardi, N., Saleem, M., and Docherty, M.

“Social Mobility Through Immigrant Resentment: Explaining Latinx Support for Restrictive Immigration Policies and Anti-Immigrant Candidates.” 2024. **Public Opinion Quarterly**, 88(1): 51-78. w/ Hickel, F., and Collingwood, L.

“The Participatory Implications of Racialized Policy Feedback.” 2023. **Perspectives on Politics**, 21(3): 932-950. w/ Garcia-Rios, S., Lajevardi, N. and Walker, H.

“Undermining Sanctuary? When Local and National Partisan Cues Diverge.” 2023. **Urban Affairs Review**, 59(1): 133-169. w/ Collingwood, L. & Martinez, G.

“Fight Not Flight: The Effects of Explicit Racism on Minority Political Engagement.” 2022. **Electoral Studies**, 80: 102515. w/ Besco, R., Garcia-Rios, S., Lagodny, J., Lajevardi, N., & Tolley, E.

“Hate, Amplified? Social Media News Consumption and Anti-Muslim Policy Support.” 2022. **Journal of Public Policy**, 42: 656-683. w/ Lajevardi, N. and Walker, H. (FirstView)

“Estimating Candidate Support in Voting Rights Act Cases: Comparing Iterative EI and EI-RxC Methods.” 2022. **Sociological Methods and Research**, 51(1): 271-304. w/ Barreto, M., Collingwood & Garcia-Rios, S.

“Beyond Generalized Ethnocentrism: Islam-Specific Beliefs and Prejudice toward Muslim Americans.” 2021. **Politics, Groups, and Identities**, 9(3): 538-565. w/ Dana, K. & Barreto, M.

“Opinion Shift and Stability: The Information Environment and Long-Lasting Opposition to Trump’s Muslim Ban.” 2021. **Political Behavior**, 43: 301–337. w/Lajevardi, N. & Collingwood, L.
Covered in: *The Washington Post* (Monkey Cage)

“The Role of Identity Prioritization: Why Some Latinx Support Restrictionist Immigration Policies and Candidates.” 2020. **Public Opinion Quarterly**, 84: 860–891. w/ Hickel, F., Alamillo, R. & Collingwood, L.

“Perceived Discrimination and Political Behavior.” 2020. **British Journal of Political Science**, 50(3): 867-892.

“The Paradox Between Integration and Perceived Discrimination Among American Muslims.” 2020. **Political Psychology**, 41(3): 587-606. w/ Lajevardi, N., Walker, H. & Westfall, A.

Winner of the 2019 American Political Science Association Race, Ethnicity, and Politics Section Best Paper Award.

"Veiled Politics: Experiences with Discrimination among Muslim Americans." 2019. **Politics and Religion**, 12(2): 629-677. w/ Dana, K., Lajevardi, N., & Walker, H.

"Partisan Attitudes toward Sanctuary Cities: The Asymmetrical Effects of Political Knowledge." 2018. **Politics and Policy**, 46 (6): 951-984. w/ Dreier, S. & Collingwood, L.

"A Change of Heart? Why Individual-Level Public Opinion Shifted against Trump's Muslim Ban." 2018. **Political Behavior**, 40: 1035-1072. w/ Collingwood, L. & Lajevardi, N.

Covered in: *The Washington Post* (Monkey Cage), *Vox*, *ThinkProgress*, *NPR*, *Al Jazeera*, *Middle East Eye*, *Psychology Today*, & *Social Psych Online*

"Old-Fashioned Racism, Contemporary Islamophobia, and the Political Isolation of Muslim Americans in the Age of Trump." 2018. **Journal of Race, Ethnicity, and Politics**, 3(1): 112-152. w/ Lajevardi, N.

"The Politics of Choice Reconsidered: Partisanship, Ideology, and Minority Politics in Washington's Charter School Initiative." 2018. **State Politics and Policy Quarterly**, 18(1): 61-92. w/ Collingwood, L. & Jochim, A.

"Muslims in Great Britain: The Impact of Mosque Attendance on Political Behaviour and Civic Engagement." 2018. **Journal of Ethnic and Migration Studies**, 44(9): 1479-1505. w/ Dana, K.

"eiCompare: Comparing Ecological Inference Estimates across EI and EI: RxC." 2016. **R Journal**, 8(2): 92-101. w/ Collingwood, L., Barreto, M. & Garcia-Rios, S.

"How Discrimination Impacts Sociopolitical Behavior: A Multidimensional Perspective." 2016. **Political Psychology**, 37(5): 613-640.

"Mosques as American Institutions: Mosque Attendance, Religiosity and Integration into the Political System among American Muslims." 2011. **Religions**, 2(4): 504-524. w/ Dana, K. & Barreto, M.

Book Chapters / Encyclopedic Entries

"Discrimination." Forthcoming. In **Springer Political Science Encyclopedia** edited by Audrey Gagnon, Stephen Sawyer, and Daniel Stockemer.

"Discrimination." 2023. In **Edward Elgar Encyclopedia of Political Sociology** edited by Maria Grasso and Marco Giugni. 33:131-133.

"Race and Racism in U.S. Campaigns." 2020. In **Oxford Handbook on Electoral Persuasion** edited by Liz Suhay, Bernie Grofman, and Alex Trechsel. 15:278-295. w/ Christopher Parker, Christopher Towler, and Loren Collingwood.

Book Reviews	“Understanding Muslim Political Life in America: Contested Citizenship in the Twenty-First Century.” Edited by Brian R. Calfano and Nazita Lajevardi. Philadelphia: Temple University Press, 2019. 248p. Perspectives on Politics.	
Public Writing	“Biden reverses Trump’s ‘Muslim Ban.’ Americans support the decision.” The Washington Post (Monkey Cage) (27 January, 2021). w/ Lajevardi, N. and Collingwood, L. “Targeted: Veiled Women Experience Significantly More Discrimination in the U.S.” Religion in Public (21 January, 2020). w/ Dana, K., Lajevardi, N., and Walker, H. “Here’s what the Democrats need to do to get the DREAM Act through Congress.” LSE American Politics and Policy Blog (29 January, 2018). Also covered by Newsweek U.S. Edition. w/ Walker, H. and Garcia-Rios, S. “Why Individual-Level Opinion Rapidly Shifted Against Trump’s ‘Muslim Ban’ Executive Order.” Religion in Public (17 January, 2018). w/ Collingwood, L. and Lajevardi, N. “Allies in name only? Latino-only leadership on DACA may trigger implicit racial biases among White liberals.” LSE American Politics and Policy Blog (28 September, 2017). w/ Garcia-Rios, S. and Walker, H. “Protests against Trump’s immigration executive order may have helped shift public opinion against it” LSE American Politics and Policy Blog (12 February, 2017). w/ Collingwood, L. and Lajevardi, N.	
Grants, Fellowships, & Awards	Champion of Experiential Learning Award, UD CAS (2025) Most Valuable Professor Award, UD Athletics (2025) Nominee of UD’s Excellence in Teaching Award (2023) UD Provost Teaching Fellow (2022-2025) APSA Race, Ethnicity, and Politics Best Paper Award (2019) w/ N. Lajevardi, H. Walker and A. Westfall AAPOR Student-Faculty Diversity Pipeline Award (2019) CTAL Instructional Improvement Grant: Engaging Diversity in Political Science w/ Kara Ellerby (\$11,000) (2018) POSCIR Seed Research Grant (\$1,500) (2018) DEL General University Research Grant (\$7,500) (2017) UW Political Science Research Fellowship (est. \$13,000) (2016) Dissertation Improvement Research Grant, UCLA (\$3000) (2015) Dean Recognition for Exceptional Pedagogical Contribution, UW (2014) Best Graduate Paper in PoliSci (w/Hannah Walker), UW (2014) UW Center for Democracy & VRA Research Fellowship (\$5,000) (2014) UW Center for Democracy & VRA Research Fellowship (\$5,000) (2013) Center for Statistics and the Social Sciences Grant (\$1,000) (2013) UW WISER Research Grant (\$2500) (2011-14) UW WISER Survey Research Fellowship (\$20,000) (2011-14)	

Grad. Opportunities & Minority Achievement Fellowship (\$4,000) (2010-11)
 Donald R. Matthews Graduate Fellowship (\$40,000) (2010-11)
 Jody Deering Nyguist Award for Excellence in Public Speaking (2008)

Research Center / Academic Affiliations

Data Science Institute (DSI), UD (2023 -)
 Master of Science in Data Science (MSDS), UD (2023 -)
 Center for Political Communication, UD (2016 -)
 Center for the Study of Diversity, UD (2016 -)
 Race, Justice, Policy Research Initiative, UD (2017-20)
 UW Center for Democracy and Voting Rights Research (2013-14)
 Washington Institute for the Study of Race & Ethnicity (WISER) (2010-16)
 Center for Social Science and Statistics (CSSS), UW (2010-16)
 Washington Survey Research Center (WASRC) (2010-15)

Teaching Experience

University of Delaware (2016 -)
 POSC 150: Intro to American Politics (x14)
 POSC 230: Intro to Politics and Social Justice (x2)
 POSC 413: Minority Politics, Representation, and Voting Rights (x4)
 POSC 867: Race, Ethnicity, and Politics (Graduate Seminar) (x3)
 POSC 807: American Political Behavior (Graduate Seminar) (x3)
 POSC 867: Parties, Elections, and Polarization (Graduate Seminar) (x1)

University of Washington (2011-2016)
 POLS 202: Intro to American Politics (x2)
 POLS 357: Minority Representation and the Voting Rights Act (x1)
 POLS 205: Political Science as a Social Science (TA)
 POLS 317: US Race and Ethnic Politics (TA)
 POLS 353: US Congress (TA)
 POLS 503: Advanced Research Design and Analysis (TA)
 LAW E 558: Voting Rights Research and the Law (TA)

Select External Invited Talks/Panels

“Bureaucratic Bias or Voter-Side Factors?’ Testing Competing Explanations for Racial Gaps in Vote-By-Mail Ballot Signature Rejections.” **Georgetown University**. Talk sponsored by the Department of Government. February 20, 2026.

“Bridging the Boundary Gap: Understanding Methods, Trade-offs, and Best Practices of Assigning Census Blocks to Precincts.” **University of California Los Angeles**. Virtual talk sponsored by the Voting Rights Project. October 30, 2025.

“Pernicious Prejudice: Scholarly Approaches to Antisemitism and Islamophobia.” **Harvard University**. Panel Cosponsored by the Edmond & Lily Safra Center for Ethics, Center for Jewish Studies, Center for Middle Eastern Studies, Center for American Political Studies, and FAS Civil Discourse Initiative. May 1, 2024.

“Diversity and the State of Democratic Citizenship.” Featured invited roundtable sponsored by the **Center for the Study of Democratic Citizenship**. April 23, 2021.

“Shocks to the System: Capturing Opinion Shift and Stability Toward Trump’s Muslim Ban.” Keynote Speaker at the Democracy and Diversity Triannual Conference at the **Center for the Study of Democratic Citizenship** in Montreal, Canada. April 24-25, 2020. [Cancelled Due to COVID-19]

“The New American Electorate.” Panelist. **Princeton University**. Event sponsored by the Center for the Study of Democratic Politics. April 3, 2020. [Cancelled Due to COVID-19]

“Neighboring Identities: Psychological and Political Reactions to Generalized and Particularized Anti-Immigrant Appeals.” w/Sergio Garcia-Rios. **University of Toronto**. Talk Sponsored by the Department of Political Science. March 6, 2020.

“History, Institutions, and Theory Research Coordination Network on Racial and Ethnic Politics.” Panelist. **University of Pennsylvania**. Event sponsored by the American Political Science Association’s Special Projects Fund and the Center for the Study of Ethnicity, Race and Immigration at Penn. February 28-29, 2020.

“Using Observational and Experimental Data to Examine the Sociopolitical Consequences of Perceived Discrimination.” **Rutgers University**. Talk sponsored by the Emerging Trends Lecture Series & the Center for the Experimental Study of Politics and Psychology. April 27, 2018.

“A Change of Heart? Using Panel Designs to Establish Causality with Real Events.” w/Loren Collingwood. **Princeton University**. Talk sponsored by the Center for the Study of Democratic Politics. April 26, 2018.

“Using Observational and Experimental Data to Examine the Sociopolitical Consequences of Perceived Discrimination.” **University of California Los Angeles**. Talk sponsored by the Race, Ethnicity and Politics Workshop. March 5, 2018.

“Muslim-American Attitudes, Sociopolitical Behavior, and Identity.” Panelist/Section Presenter. **University of California Los Angeles**. Event sponsored by the Luskin School of Public Affairs & the National Science Foundation. December 15, 2017.

“Muslim-American Political Behavior.” Panelist/Section Presenter. **Menlo College**. Event sponsored by Menlo College & the National Science Foundation. December 16, 2016.

**Select
Internal/Public
Invited
Talks/Panels**

“American Presidency and Political Power.” Talk sponsored by the YALI Mandela Washington Fellows Program at the University of Delaware. June 21, 2024.

“How Democratic is the U.S. Constitution, and to What Extent did the Founding Fathers Oppose Majority Rule?” Speaker. University Day Public Lecture. March 18, 2023.

“Executive Power and the U.S. Democracy.” Talk sponsored by the YALI Mandela Washington Fellows Program at the University of Delaware. July 13, 2023.

“Executive Power and the U.S. Democracy.” Talk sponsored by the YALI Mandela Washington Fellows Program at the University of Delaware. July 2022.

“Race, Ethnicity, and Gender in the 2020 Election.” Speaker. Panel sponsored by the University of Delaware POSCIR. December 14, 2020.

“Building Community: Scholarship and Connection among Faculty of Color.” Speaker. Panel sponsored by the Center for the Study of Diversity (CSD) at the University of Delaware. February 24, 2020.

“Executive Power and the U.S. Democracy.” Talk sponsored by the 2019 YALI Mandela Washington Fellows Program at the University of Delaware. July 2, 2019.

“Opinion Shift and Stability: Long-Lasting Opposition toward Trump’s Muslim Ban.” Talk sponsored by the Department of Sociology and Criminal Justice Colloquium Speaker Series at the University of Delaware. April 24, 2019.

“Old-Fashioned Racism and the Roots of Contemporary Islamophobia.” Talk sponsored by the Center for the Study of Diversity (CSD) Colloquium Speaker Series at the University of Delaware. December 6, 2018.

“Understanding Executive Power in the United States.” Talk sponsored by the 2018 YALI Mandela Washington Fellows Program at the University of Delaware. July 2, 2018.

“The Inclusion and Exclusion of Minority Groups in the United States.” Talk sponsored by the 2017 YALI Mandela Washington Fellows Program at the University of Delaware. July 11, 2017.

“Inclusion and Exclusion: Perceptions of Discrimination in the Workplace.” Diversity Summit Presenter. Talk sponsored by the Office of Equity and Inclusion at the University of Delaware. June 20, 2017.

“What Happens Now Part II? A Forum to Discuss Bigotry & Closed Borders

in the Trump Era.” Speaker. Panel sponsored by the Department of Women and Gender Studies, Sociology and Criminal Justice, Political Science and International Relations, & the College of Arts and Sciences at the University of Delaware. February 13, 2017.

“Forum on the Travel Ban Executive Order.” Speaker. Panel sponsored by the University of Delaware Provost Office. February 7, 2017.

“What Happens Now Part I? Fear, Diversity, and Inclusion in Post-U.S. Election.” Speaker. Panel sponsored by Women and Gender Studies, Sociology and Criminal Justice, Political Science and International Relations, History, & the College of Arts and Sciences at the University of Delaware. November 30, 2016.

“Race, Religion, and Gender.” Election Central Panelist. Event sponsored by the Center for Political Communication at the University of Delaware. November 8, 2016.

**Select
Conference
Papers**

2024

“Motivated Misperceptions and Public Opinion about Abortion” Paper Presentation (Lead, Dr. Cassese) at the Annual American Political Science Association Conference (APSA)

2021

“Partisan Winners and Losers: Testing Alternative Frames of Congressional Election Results Among White and Latino Voters.” Online Paper Presentation at the Annual American Political Science Association Conference (APSA).

“Kissing Up and Kicking Down: How Immigrant Resentment Impacts Latinx Support for Donald Trump and Restrictive Immigration Policies.” Online Paper Presentation at the Annual American Political Science Association Conference (APSA).

“How do Political Attacks Affect Racial and Ethnic Self-Identities?” Online Paper Presentation at the Annual Midwest Political Science Association Conference (MPSA).

“Kissing Up and Kicking Down: How Immigrant Resentment Impacts Latinx Support for Donald Trump and Restrictive Immigration Policies.” Online Paper Presentation at the Annual Midwest Political Science Association Conference (MPSA).

2019

“The Significance of Politicized Group Identities: Re-examining the Relationship between Contact with Punitive Political Institutions and Political Participation.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

“Threat or Reassurance? Framing Midterm results among Latinos and Whites.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

“When American Identity Trumps Latinx Identity: Explaining Support for Restrictive Immigration Policies.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

“Anti-Minority Politics and Political Participation: Evidence from Four Countries.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Washington DC.

2018

“Assessing the Link between Interactions with Punitive Political Institutions and Political Behavior.” Paper Presentation at the 2018 Symposium on the Politics of Immigration, Race, and Ethnicity (SPIRE) Meeting in Philadelphia, PA (University of Pennsylvania).

“Are Integrated Muslim Americans More Likely to Perceive Discrimination?” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Boston, MA.

“Opinion Shift and Stability: Enduring Individual-Level Opposition to Trump’s Muslim Ban.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Boston, MA.

“Assessing the Link between Interactions with Punitive Political Institutions and Political Behavior.” Paper Presentation at the 2018 Collaborative Multiracial Post-Election Study (CMPS) Meeting in Los Angeles, CA (UCLA).

2017

“A Change of Heart? Why Individual-Level Public Opinion Shifted against Trump’s Muslim Ban.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in San Francisco, CA.

“Veiled Politics: Experiences with Discrimination among American Muslims.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in San Francisco, CA.

“The Racial Shield as Racism Exoneration: Explaining White Racist Support for Conservative Minority Candidates.” Paper Presentation at the Annual Western Political Science Association Conference (WPSA) in Vancouver BC, Canada.

“Assessing the Mechanism Linking Discrimination to Democratic Engagement.” Paper Presentation at the Annual American Political Science Association Conference (APSA) in Philadelphia, PA.

“Estimating Candidate Support: Comparing EI and EI-RxC.” Paper Presentation at the Annual Midwest Political Science Association Conference (MPSA) in Chicago, Illinois.

**Student
Supervision**

Sadie Ellington, Dissertation Committee Member (POSC)
Enes Aksu, Dissertation Committee Member (POSC)
Enes Tuzgen, Dissertation Committee Member (POSC)
Olga Gerasimenko, Dissertation Committee Member (POSC)
Furkan Karakayan, Dissertation Committee Member (POSC)
Richard Takyi Amoah, Dissertation Committee Member (ECON)
Sheila Afrakomah, Dissertation Committee Member (ECON)
Ahmet Ates, Dissertation Committee Member (POSC)
Charles Mays, Long Paper and Dissertation Chair (POSC)
Ian Mumma, Long Paper Committee Member (POSC)
Clark Shanahan, Long Paper Committee Member (POSC)
Natalie Standridge, Long Paper Committee Member (POSC)
Fahmida Zaman, Research Assistant Supervisor (POSC)
Lola Bessis, Independent Research Supervisor (POSC)

Rachel Spruill, Undergraduate Honors Thesis Chair
Satvika Kadiyala, Undergraduate Summer Scholars Advisor
Jessica Sack, Undergraduate Honors Thesis Chair
Jordan Spencer, Undergraduate Faculty Mentor for the McNair Program
Lauren Turenchalk, Undergraduate Research Supervisor

**Professional
Service**

Editorial Board Member

Politics and Religion (6/2018 - 12/2021)

Select Discipline Service

American Political Science Association (APSA) REP Section Executive Council (2025-2027)

American Political Science Association (APSA) REP Section Conference Chair (2021-2022)

Western Political Science Association (WPSA) Task Force on Equity, Inclusion, and Access in the Discipline (2020-2021)

American Political Science Association (APSA) REP Best Paper Award Committee Member (2020)

Select University Service

College of Arts & Sciences Senator (2025)
Community Engagement Scholars Faculty Review Board Member (Winter/Spring 2022)
Summer Educational and Cultural Experience Program (SECEP)
Lecturer of Politics and Justice in the United States. (July 27 - August 20, 2019)

Select Department Service Roles

Director of Graduate Admissions & Funding
Director of Undergraduate Internships
Executive and Advisory Committee Member
Member of Hiring Committees
Faculty Review Committee Member
Graduate Placement Committee Chair
Academic Program Review Steering Committee Member
Academic Program Review Response Committee Member
Undergraduate Advising (Standard Annual Load)
Diversity, Equity, and Inclusion Committee Member
New Minor Development Committee Member
Social Science Sponsored Research Committee Member

Manuscript Reviewer/Referee

American Journal of Political Science, American Political Science Review, American Politics Research, British Journal of Political Science, Belgian Federal office for Science Policy, Behavioral Sciences of Terrorism and Political Aggression, Cambridge University Press, Electoral Studies, European Journal of Political Research, European Political Science Review, International Journal of Public Opinion, Journal of Elections, Public Opinion & Parties, Journal of Ethnic and Migration Studies, Journal of Public Policy, Journal of Politics, Journal of Race, Ethnicity and Politics, Journal of Women, Politics & Policy, Migration Studies, Perspectives on Politics, Political Behavior, Politics, Groups, and Identities, Political Psychology, Political Research Quarterly, Politics and Religion, Political Studies Review, PS: Political Science & Politics, Public Opinion Quarterly, Social Science Quarterly, Time-Sharing Experiments for the Social Sciences

Conference Coordination

Politics of Race, Immigration, and Ethnicity Consortium (PRIEC) at the University of Delaware. (2020)

Politics of Race, Immigration, and Ethnicity Consortium (PRIEC) at the University of Washington. (2013)

Latinos and the Voting Rights Act. Center for Democracy and Voting Rights Research at the University of Washington Law School. (2013)

Islam in the Public Sphere Conference. Washington Institute for the Study of Race & Ethnicity (WISER). (2011)

**Select Expert
Consulting
Experience**

State of Maryland Attorney General's Office; 2021 MD Redistricting

Baltimore County Branch of the NAACP v. Baltimore County, Maryland, No. 1:21-cv-03232-LKG (D. Md. 2022)

Common Cause Florida v. Lee, 4:22-cv-109-AW-MAF (N.D. Fla.)

Common Cause Florida v. Byrd, No. 4:22-cv-00109-AW-MAF (N.D. Fla. 2022) [Deposed]

Dickinson Bay Area NAACP Branch v. Galveston County, Texas, No. 3:22-cv-117-JVB (S.D. Tex. 2023) [Deposed & Testified]

Reyes v. Chilton, 4:21-cv-05075-MKD (E.D. Wash. 2021) [Deposed]

Roswell Independent School District (RISD); 2022 Redistricting

Caroline County Branch of the NAACP v. Town of Federalsburg, Civ. Action No. 23-SAG-00484 (D.Md. 2023)

Cobb County Board of Elections and Registration, No. 1:22-cv-02300-ELR (N.D. Ga. 2022)

Coca v. City of Dodge City, et al. Case no. 6:22-cv-01274 (D Kan. 2022) [Deposed & Testified]

Soto Palmer v. Hobbs, No. 3:22-cv-05035-RSL (W.D. Wash. 2021) [Testified]

Stone v. Allen, No. 2-21-cv-1531 (N.D. Ala. 2021) [Deposed & Testified]

Wicomico County Branch of the NAACP et al v. Wicomico County, MD, Civ. Action No. 23-MJM-03325 (D. Md. 2023)

New York Communities for Change et al v. County of Nassau, NY, No. 602316/2024 (N.Y.S.) [Deposed & Testified]

NC NAACP et al v. Berger et al, No. 23-cv-1104 (M.D. NC. 2023) [Deposed & Testified]

League of Women Voters of Utah, et al. v. Utah State Legislature, et al.,

**Previous
Research
Positions**

Senior Researcher, Washington Poll 2010-2014
Public Opinion Survey Design, Programming, and Analysis.

Researcher, Center for Democracy & Voting Rights Research 2013-2014
Racially Polarized Voting (RPV) Analysis of jurisdictions in states such as: California, Florida, Texas, and Washington.

Investigator, Washington State Charter School Initiative 2013
Precinct and school district level data collection and analysis of the I-1240 Vote for S360 Polling Firm and Melinda & Gates Foundation.

**Skills &
Additional
Information**

Software: ,  Python (Basic), ,  $\text{\LaTeX}$,  esri,  DRA2020
Languages: Farsi (Persian)–Native Speaker
R Packages: eiCompare (contributor), eiExpand (contributor)