

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

COAKLEY PENDERGRASS; TRIANA
ARNOLD JAMES; ELLIOTT
HENNINGTON; ROBERT RICHARDS;
JENS RUECKERT; and OJUAN GLAZE,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official
capacity as the Georgia Secretary of State;
SARA TINDALL GHAZAL, in her
official capacity as a member of the State
Election Board; ANH LE, in her official
capacity as a member of the State Election
Board; EDWARD LINDSEY, in his
official capacity as a member of the State
Election Board; and MATTHEW
MASHBURN, in his official capacity as a
member of the State Election Board,

Defendants.*

CIVIL ACTION FILE
NO. 1:21-CV-05339-SCJ

**SECOND DECLARATION OF KEVIN J. HAMILTON IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Kevin J. Hamilton, hereby declare as follows:

* Pursuant to Federal Rule of Civil Procedure 25(d), Plaintiffs have automatically substituted Edward Lindsey, in his official capacity, for Rebecca N. Sullivan, in her official capacity, based on Defendants' representation in their status report of January 11, 2022. *See* Defs.' Status Report 2 n.1, ECF No. 31.

1. I am over the age of 18 and competent to make this declaration. I am a partner with the law firm Perkins Coie LLP and am admitted to practice law in the State of Washington and before the Supreme Court of the United States and multiple federal courts of appeals and district courts. I am admitted in this Court *pro hac vice* in the above-captioned matter, and I am counsel for Plaintiffs. I submit this declaration to provide the Court true and correct copies of certain documents submitted in support of Plaintiffs' Motion for Preliminary Injunction.

Exhibit 1 is a true and correct copy of the supplemental expert report of William S. Cooper, dated January 20, 2022.

Exhibit 2 is a true and correct copy of the supplemental expert report of Dr. Orville Vernon Burton of Clemson University, dated January 20, 2022.

Dated: January 20, 2022

Respectfully submitted,

By: **Kevin J. Hamilton**

Kevin J. Hamilton*

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*Admitted *pro hac vice*

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
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COAKLEY PENDERGRASS et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official
capacity as the Georgia Secretary of State,
et al.,

Defendants.

CIVIL ACTION FILE

NO. 1:21-CV-05339-SCJ

SUPPLEMENTAL DECLARATION OF WILLIAM S. COOPER

WILLIAM S. COOPER, acting in accordance with 28 U.S.C. § 1746, Federal Rule of Civil Procedure 26(a)(2)(B), and Federal Rules of Evidence 702 and 703, does hereby declare and say:

1. My name is William S. Cooper. I have a B.A. in Economics from Davidson College. As a private consultant, I serve as a demographic and redistricting expert for the Plaintiffs.

2. I file a supplemental declaration in this lawsuit in response to assertions made by John Morgan and to provide further information supporting the *Gingles* 1 analysis in my January 12, 2022 declaration (“January 12 Declaration”).

3. First, the Defendants in this case claim that the additional majority-Black congressional district I have drawn does not satisfy the *Gingles* 1 precondition because the minority population in the western part of Metro Atlanta is not sufficiently compact. This, of course, is not true. The enacted 2021 State Senate plan includes four majority-Black districts that encompass parts of western Fulton County, southern Cobb County, eastern Douglas County, and northern Fayette County—the same area encompassed by my illustrative Sixth Congressional District. Four Senate districts are exactly the equivalent of one congressional district in terms of population.

4. Second, Mr. Morgan’s discussion of core constituency analysis here does not make sense. Core retention is largely irrelevant when an election plan is challenged on the grounds that it violates Section 2. of the VRA. The very nature of the challenge means that districts adjacent to the demonstrative majority-minority district must change, while adhering to traditional redistricting principles. Notably, the Illustrative Plan makes no changes at all to six of the congressional districts in the 2021 Plan, while adhering to traditional redistricting principles in the remaining eight districts that are changed.

5. Third, I have included an updated chart below comparing Black voting age populations and Black citizen voting age populations in all 14 congressional

districts that comprise the Illustrative Plan that I prepared and submitted with the January 12 Declaration.

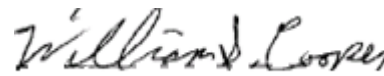
Figure 1
BVAP and BCVAP Comparison: Illustrative Plan and 2021 Plan

District	Illustrative Plan			2021 Plan	
	% BVAP	% NH BCVAP		% BVAP	% NH BCVAP
001	28.17%	29.85%		28.17%	29.85%
002	49.29%	50.00%		49.29%	50.00%
003	20.92%	20.40%		23.32%	22.82%
004	52.40%	55.48%		54.52%	58.04%
005	49.60%	53.48%		49.60%	53.48%
006	50.23%	50.69%		9.91%	10.00%
007	29.82%	31.93%		29.82%	31.93%
008	30.04%	30.61%		30.04%	30.61%
009	11.66%	11.66%		10.42%	10.38%
010	14.31%	15.38%		22.60%	22.56%
011	13.27%	13.30%		17.95%	18.09%
012	36.72%	37.20%		36.72%	37.20%
013	51.40%	50.05%		66.75%	66.88%
014	5.17%	5.14%		14.28%	13.38%

I reserve the right to continue to supplement my report in light of additional facts, testimony, and/or materials that might come to light.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 20, 2022



WILLIAM S. COOPER

EXHIBIT 2

Pendergrass et al. v. Raffensperger, et al.

United States District Court for the Northern District of Georgia

Supplemental Expert Report of Orville Vernon Burton, Ph.D.

A handwritten signature in black ink that reads "Orville Vernon Burton". The signature is written in a cursive style with a large initial "O" and "V".

Dr. Orville Vernon Burton

January 20, 2022

In the matter of *Pendergrass et al. v. Raffensperger, et al.*, I wrote an expert report on the history of voting of voting-related discrimination in Georgia. Since submitting that report, I have reviewed the State's opposition to the *Pendergrass* plaintiffs' motion for a preliminary injunction, which argues, in part, that any losses by the preferred candidates of Black voters in Georgia may be explainable on the basis of partisanship, not race. In this supplemental report, I briefly respond to this argument, which fails to recognize that partisanship and race are, and have been, inextricably intertwined in Georgia.

I. INTRODUCTION

Race is a central feature of politics in Georgia. Though race is central to any explanation of the modern party system in the South, and particularly in Georgia, racial identification is a complex phenomenon. A variety of factors, such as the racial context of an election, contribute to the importance of race in partisan politics. While the degree may vary, race is always a factor in southern campaigns.¹ As Valentino and Sears note, "race has been a dominant element in Southern politics from the beginning."²

As discussed at length below, as a historical matter, the alignment in Georgia of Black voters with the Democratic Party and white voters with the Republican Party that we see today stems from the Civil Rights Act of 1964 and the Voting Rights Act of 1965 (VRA). It is worth noting that this realignment that began in the 1960s was not the result of a new issue which redefined partisan politics; instead, it was caused by new divisions based on an old issue. Southern whites, even today, continue to be antagonistic towards policies designed to promote the political, economic, and social progress of minorities.³ However, it is clear that the explicitly race-based policies of the 1960s sparked the formation of the political alignment of Black and white voters that we see today in Georgia.

It is equally worth noting that my discussion here is not meant to, and does not, suggest in any way that all voters who identify with the Republican Party in Georgia are racist. Instead, it is

¹ James M. Glaser, *Race, Campaign Politics, and the Realignment in the South* (New Haven: Yale University Press, 1996), 25-26, 43.

² Nicholas A. Valentino and David O. Sears. "Old Times There Are Not Forgotten: Race and Partisan Realignment in the Contemporary South," *American Journal of Political Science*. vol. 49, no. 3 (2005), 672-688.

³ James M. Glaser, *Race, Campaign Politics, and the Realignment in the South* (New Haven: Yale University Press, 1996), 17, 19.

meant to show that race unquestionably contributes to Georgia's partisan divides today, and, similarly, that those divides cannot be fully explained without discussing race.

II. FINDINGS

A. Historical Foundations of the Partisan Divide Among Black and White Georgians

The Democratic Party's embrace of civil rights policies in the mid-20th Century caused Black voters to leave the Republican Party (the Party of Lincoln) for the Democratic Party. At the same time, the Democratic Party's embrace of civil rights legislation sparked what Earl Black and Merle Black describe as the "Great White Switch," in which white voters abandoned the Democratic Party for the Republican Party. Most notably, Arizona Senator Barry Goldwater led the Republican Party in opposing these civil rights policies, catalyzing the shift of white voters to the Republican Party. Beginning in the 1960s and continuing to the present, the Republican Party has identified itself with racial conservatism. Consistent with this strategy, Republicans today continue to use racialized politics and race-based appeals to attract racially conservative white voters.⁴

As Goldwater told a group of Republicans from southern states, it was better for the Republican Party to forego the "Negro vote" and instead court white southerners who opposed equal rights.⁵ Historians agree that Goldwater "sought to create a general polarization of southern voters along racial lines." The effectiveness of what was called the "Southern strategy" during Richard Nixon's presidency had a profound impact on the development of the nearly all-white modern Republican Party in the South. Although more subtle in his appeal to white southern voters, Nixon followed the advice of Republican Party strategist Kevin Phillips in 1970. Phillips argued that "[t]he GOP can build a winning coalition without Negro voters." He understood, and

⁴ Earl Black and Merle Black, *Politics and Society in the South* (Cambridge: Harvard University Press, 1987); Thomas F. Schaller, *Whistling Past Dixie: How Democrats Can Win Without the South*, (New York: Simon and Schuster, 2006), 65; Kevin P. Phillips, *The Emerging Republican Majority* (New Rochelle, NY: Arlington House, 1969); Dan T. Carter, *Politics of Rage: George Wallace, the Origins of the new Conservatism, and the Transformation of American Politics* (Baton Rouge: Louisiana State University Press, 2000); Dan T. Carter, *From George Wallace to Newt Gingrich: Race in the Conservative Counterrevolution, 1963-1994* (Baton Rouge: Louisiana State University Press, 1996); Rick Perlstein, *Before the Storm: Barry Goldwater and the Unmaking of the American Consensus* (New York: Hill and Wang, 2001).

⁵ Dan T. Carter, "Unfinished Transformation: Matthew J. Perry's South Carolina," in *Matthew J. Perry: The Man, His Times, and His Legacy*, ed., W. Lewis Burke and Belinda F. Gergel (Columbia: University of South Carolina Press, 2004), 251.

made certain others understood, that “Negro-Democratic mutual identification” was important for the building of a white Republican Party in the South. With Phillips’s Southern Strategy, the Democratic Party in the South became identified as the “Negro party through most of the South.” With the Democratic Party identified with African Americans, whites in the South would become Republicans and that would allow the Republican Party to become the majority party in what had traditionally been the solid Democratic South.⁶ After studying Phillips’s plan, Nixon told his staff to implement the strategy and emphasized, “don’t go for Jews and Blacks.”⁷

Georgia was a focal point of this strategy. Following the leadership of Richard Nixon and the Republican National Committee, the Georgia Republican party insurgence was grounded on fiscal conservatism, opposition to integration (particularly busing), and a growing demand among white suburbanites for “law and order.” The rallying cry of “law and order” became a dog whistle for many candidates and voters.⁸

The Southern Strategy continued after Nixon, especially with Ronald Reagan’s campaign against native Georgian Jimmy Carter. Reagan’s 1980 presidential campaign was extremely effective at using subtle racial appeals to win white votes. Indeed, he chose to open that campaign with a state’s rights speech at the Neshoba County Fair in Mississippi, the notorious scene of the murder of three civil rights workers in 1964. His campaign also used racial coded terms such as “welfare queen” and “strapping young buck.” Reagan got 22% of Democrats to support him, but those defections were substantially higher among Democrats with racially conservative views. 71% of Democrats who felt “the government should not make any special effort to help [African Americans] because they should help themselves” voted for Reagan.

Similarly, in the 1988 campaign, Republican candidate George H.W. Bush associated Democratic candidate Governor Michael Dukakis with Willie Horton, an African American

⁶ Kevin P. Phillips, *The Emerging Republican Majority* (New York: Arlington House, 1969), 467-68.

⁷ Carter, *From George Wallace to Newt Gingrich*, 45; Kenneth O’Reilly, *Nixon’s Piano: Presidents and Racial Politics from Washington to Clinton* (New York: Free Press, 1995), 285-86; Dan Carter, “Civil Rights and Politics in South Carolina: The Perspective of One Lifetime, 1940-2003” in *Toward the Meeting of the Waters: Currents in the Civil Rights Movement of South Carolina during the Twentieth Century*, ed. Winfred B. Moore, Jr. and Orville Vernon Burton (Columbia: University of South Carolina Press, 2008), 413.

⁸ Matthew D. Lassiter, *The Silent Majority: Suburban Politics in the Sunbelt South* (Princeton, NJ: Princeton University Press, 2006), 234.

convicted of murder who committed an additional murder and rape when released on a weekend furlough program for prisoners that had been supported by Governor Dukakis. The Bush campaign showed images of Mr. Horton, rendering the racial appeal clear: supporting Dukakis would allow Black murders to roam the streets. This appeal to the racial fears contributed to Bush's victory in 1988.⁹

Today, explicit racial appeals in politics are considered more taboo than they were in the mid-20th Century. Nonetheless, implicit or subtle appeals to race are still common and contribute to Georgia's racial polarization. As Republican political operative Lee Atwater explained, when the Republican Party recognized that overt appeals were no longer effective, they shifted to ideas with plainly racial ties: "forced busing, states' rights, and all that stuff."¹⁰ These implicit racial appeals communicate the same ideas as explicit racial appeals by alluding to "racial stereotypes or a perceived threat" from racial or ethnic minorities. Mendelberg defined an implicit racial appeal as "one that contains a recognizable – if subtle – racial reference, most easily through visual references."¹¹ Ian Haney Lopez described implicit racial appeals as a "coded racial appeal," with "one core point of the code being to foster deniability," since the "explicit racial appeal of yesteryear now invites political suicide." One characteristic of implicit racial appeals is that they are usually most successful when their racial subtext goes undetected.¹² Implicit racial appeals make use of coded language to activate racial thinking.¹³ Racial cues, in the form of code words, such as "welfare queen," "lazy," "criminal," "taking advantage," "corruption," "fraud," and "law and order" are racial code words that refer back to Reconstruction era when African Americans

⁹ Ian Haney Lopez, *Dog Whistle Politics: How Coded Racial Appeals Have Reinvented Racism and Wrecked the Middle Class* (New York: Oxford University Press, 2013) 59, 105-7; Orville Vernon Burton, *Justice Deferred: Race and the Supreme Court* (Cambridge: The Belknap Press of Harvard University Press, 2021), 260, 328.

¹⁰ Rick Perlstein, "Exclusive: Lee Atwater's Infamous 1981 Interview on the Southern Strategy," *The Nation*. November 13, 2012, <http://www.thenation.com/article/170841/exclusive-lee-atwaters-infamous-1981-interview-southern-strategy> (accessed March 31, 2014).

¹¹ Tali Mendelberg, *The Race Card: Campaign Strategy, Implicit Messages, and the Norm of Equality* (Princeton: Princeton University Press, 2001), 9, 11.

¹² Lopez, *Dog Whistle Politics*, 130, 4.

¹³ Nicholas A. Valentino, Vincent L. Hutchings, and Ismail K. White. "Cues that Matter: How Political Ads Prime Racial Attitudes During Elections," *American Political Science Review* 96 (2002), 75-90.

were elected to office. Other coded issues, such as “poverty” and “immigration,” prime racial attitudes among white voters.¹⁴

Georgia is a flash point of this modern strategy. According to Dr. Peyton McCrary, a historian who recently retired after a 26-year career with the Department of Justice: “In Georgia politics since 2002, state government is dominated by the Republican Party, the party to which now most non-Hispanic white persons belong. The greatest electoral threat to the Republican Party and Georgia’s governing elected officials is the growing number of African American, Hispanic, and Asian citizens, who tend strongly to support Democratic candidates. The increase in minority population and the threat of increasing minority voting strength provides a powerful incentive for Republican officials at the state and local level to place hurdles in the path of minority citizens seeking to register and vote. That is what has happened.”¹⁵ Moreover, “In white-majority Georgia, Republicans benefitted from a pattern of voting that was polarized along racial lines.”¹⁶ University of Georgia political scientist Charles Bullock noted that “the relationship between race and voting in 2002 was striking.”¹⁷ Moreover, Bullock and Keith Gaddie showed that “since 1992, Democrats have always taken at least 80 percent of the black vote while most whites invariably preferred Republicans.”¹⁸

Indeed, the racial bloc voting in Georgia is so strong, and race and partisanship so deeply intertwined, that statisticians refer to it as multicollinearity, meaning one cannot, as a scientific matter, separate partisanship from race in Georgia elections.¹⁹

¹⁴ Charlton D. McIlwain and Stephen M. Caliendo, *Race Appeal: How Candidates Invoke Race in US Campaigns* (Philadelphia: Temple University Press, 2011) 19-21, 153, 154; Rosalee A. Clawson. “Poor People, Black Faces: The Portrayal of Poverty in Economics Textbooks,” *Journal of Black Studies* 32 (2002), 352-61; Rosalee A. Clawson and Rakuka Trice. “Poverty as We Know It: Media Portrayals of the Poor,” *Public Opinion Quarterly* 64 (2000), 53-64; Valentino, Hutchings, and White, “Cues that Matter,” 87

¹⁵ Dr. Peyton McCrary, Expert Report, Fair Fight Action v. Raffensperger, Civil Action File No. 1:18-cv-05391SCJ, Document 339 (Filed 04/24/20) p. 8.

¹⁶ McCrary Report, p. 30.

¹⁷ Charles S. Bullock III, “Georgia: Republicans at the High Water Mark?” in Bullock and Mark J. Rozell (eds.), *The New Politics of the Old South* 5th edition (New York, Rowman & Littlefield, 2014), 58.

¹⁸ Charles S. Bullock III and Ronald Keith Gaddie, *The Triumph of Voting Rights in the South* (Norman, University of Oklahoma Press, 2009), 100.

¹⁹ Donald E. Farrar and Robert R. Glauber, “Multicollinearity in Regression Analysis: The Problem Revisited,” *Review of Economics and Statistics*, XLIX (February 1967), 92-107, esp. p.

B. Divergent Race-Related Views of Members of the Democratic and Republican Parties in Georgia

Aside from the use and effect of racial appeals in Georgia, the significant impact race has on the state's partisan divides is made readily apparent when one considers the opposing positions that members of Georgia's Democratic and Republican parties take on issues inextricably linked to race. For example, the Democratic and Republican members of Georgia's congressional delegation consistently oppose one another on issues relating to civil rights. As indicated in the table below, each Republican member of the delegation during the 2017-2019 congressional session received extremely low scores (no higher than 6-13% on a scale of 0-100%) on the civil rights scorecard produced by the NAACP, an organization dedicated to promoting minority rights. Meanwhile, each Democratic member received extremely high scores (81-100%).

Pro-Civil Rights Votes Among Georgia's Congressional Delegation, 2017-2019 Congressional Session²⁰			
Republican Members		Democratic Members	
Johnny Isakson	13%	Sanford Bishop Jr.	81%
David Perdue	9%	Hank Johnson	100%
Earl "Buddy" Carter	6%	John Lewis	97%
Drew Ferguson	13%	David Scott	84%
Rob Woodall	9%		
Austin Scott	13%		
Doug Collins	6%		
Jody B. Hice	6%		
Barry Loudermilk	6%		
Rick W. Allen	9%		
Tom Graves	9%		

The Pew Research Center's *Beyond Red and Blue: The Political Typology* (issued in November 2021) confirm these differences between the parties on issues relating to race. This study divided political allegiance into nine distinct typology groups, four leaning Republican, four leaning Democratic, with the "Stressed Sideliners," uncertain and generally not following politics very closely.²¹ Among the four Republican groupings [Faith and Flag Conservatives (85% white),

98; Peyton McCrary, Clark Miller, and Dale Baum, "Class and Party in the Secession Crisis: Voting Behavior in the Deep South, 1856-1861," *Journal of Interdisciplinary History* viii:3 (Winter 1978): 450, n 35.

²⁰ NAACP Civil Rights Federal Legislative Report Card, Congressional Votes 2017-2018 (2019), <https://naacp.org/sites/default/files/documents/115th-Final-Report-Card.pdf>.

²¹ Pew Research Center, *Beyond Red and Blue: The Political Typology*, 9 November, 2021, <https://www.pewresearch.org/politics/2021/11/09/beyond-red-vs-blue-the-political-typology-2/>.

Committed Conservatives (82% white), Populist Right (85% white), and Ambivalent Right (65% white], the survey found “no more than about a quarter say a lot more has to be done to ensure equal rights for all Americans regardless of their racial or ethnic backgrounds, by comparison, no fewer than about three-quarters of any Democratic group [Progressive Left (68% white), Establishment Liberals (51% white), Democratic Mainstays 46% white), and Outsider Left (49% white) says a lot more needs to be done to achieve this goal.”²² The four Republican groups agreed between 78 and 94% that “white people do not benefit much or not at all from the advantage that Black people do not have,” or in other words, that there is no systematic racism at work in American society or institutions.²³ Among the four Democratic leaning groups, there was agreement (between 73 and 96%) that “a lot more needs to be done to ensure equal rights for all Americans regardless of their ethnic or racial backgrounds.”²⁴

Georgia-specific polls suggest the same. An NORC poll conducted for 3,291 likely Georgia voters just before the 2020 election found that 45% were Democratic or Democratic leaning, 51% Republican or Republican leaning. On the question of whether racism was one of the most serious problems facing U.S. society, 22% of Republican respondents and 76% of Democratic respondents said it was a very serious problem, while 77% of Republican respondents and 21% of Democratic respondents said it was less serious or not a significant problem. On the question of whether racism was a serious problem in policing, 18% of Republican respondents and 81% of Democratic respondents said it was, while 77% of Republican respondents and 21% of Democratic respondents said it was less serious or not a problem.²⁵

C. Partisan Race-Based Attacks in Georgia

The racialized aspects of Georgia’s partisan politics extend beyond just racial appeals and race-related policies. Spurious allegations of voter fraud in Georgia jurisdictions with Black or interracial governments have long been a rallying cry among Republicans. For example, in my initial report, on pages 42-45, I discuss the notorious and unwarranted attacks by then Secretary of State Brian Kemp on the “Quitman 10 +2.,” the criminal investigation of the New Georgia Project, and a 2015 investigation into the Asian American Legal Advocacy Center (AALAC).

²² Ibid., 7

²³ Ibid., 14

²⁴ Ibid., 29

²⁵ “Georgia Voter Surveys: How Different Groups Voted,” New York Times, 3 November 2020

The most recent such example occurred as a consequence of the 2020 election, when Republicans attacked two Black poll workers in Fulton County, Ruby Freeman and her daughter Shaye Moss. In his testimony before the Georgia Senate, Rudy Giuliani showed a video which purported to show Freeman and Moss engaging in “surreptitious illegal activities” akin to “drug dealers” who were “passing out dope,” reflecting old racist tropes about persons of color. Although the accusations were utter nonsense, former President Trump told Secretary of State Raffensperger that Ruby Freeman was a “professional vote scammer and hustler.” The two women received harassing phone calls and death threats, often laced with racial slurs, frightening nighttime knocks on their doors—they had to leave their residence and go into hiding—along with suggestions that they should be “strung up from the nearest lamppost and set on fire.”²⁶

The drumbeat of allegations against the “integrity” of Georgia’s electoral processes, especially as practiced in the interracial county governments in the Atlanta metro area, has continued. In August 2021, Republican Congressman Jody Hice, who has challenged Raffensperger in the Republican primary in the race for Secretary of State, stated that “as long as *these people* are allowed to continue cheating, they will continue to do so.” Kemp claimed that “Fulton County has a long history of mismanagement, incompetence, and lack of transparency when it comes to running elections, including during the 2020 elections.” Butch Miller, a candidate for lieutenant-governor argued that “maintaining integrity of our elections is of the utmost importance to me and my colleagues in the state senate. Unfortunately, Fulton County’s apparent disregard for election procedures and state law have called that integrity into doubt.”²⁷

III. CONCLUSION

In sum, the correlation between race and party in Georgia is no coincidence. Instead, race and issues inextricably linked to race have long played a role in separating Black and white voters along partisan lines, and they continue to contribute to the partisan divisions we see today.

²⁶ Jason Szep and Linda So, “Trump Campaign Demonized Two Georgia Election Workers—And Death Threats Followed,” Reuters, 1 December 2021,” <https://www.reuters.com/investigates/special-report/usa-election-threats-georgia/> (emphasis added).

²⁷ Mark Niese “Board Launches Fulton County Election Woes Inquiry 19 August, 2021