

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**JOHN ROBERT SMITH, SHIRLEY HALL  
AND GENE WALKER**

**PLAINTIFFS**

**VS.**

**Civil Action No. 3:01-cv-855-HTW-DCB-EGJ**

**DELBERT HOSEMAN, Secretary of State of  
Mississippi; JIM HOOD, Attorney General for the State of  
Mississippi; HALEY BARBOUR,  
Governor of the State of Mississippi; MISSISSIPPI  
REPUBLICAN EXECUTIVE COMMITTEE; and  
MISSISSIPPI DEMOCRATIC EXECUTIVE  
COMMITTEE**

**DEFENDANTS**

**and**

**BEATRICE BRANCH, RIMS BARBER,  
L.C. DORSEY, DAVID RULE,  
JAMES WOODWARD, JOSEPH P. HUDSON,  
and ROBERT NORVEL  
INTERVENORS**

**CONSOLIDATED WITH**

**KELVIN BUCK, ET AL.**

**PLAINTIFFS**

**VS.**

**Civil Action No. 3:11-cv-717-HTW-LRA**

**HALEY BARBOUR, ET AL.**

**DEFENDANTS**

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**DECLARATION OF  
KAREEM CRAYTON**

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**STATE OF MARYLAND**

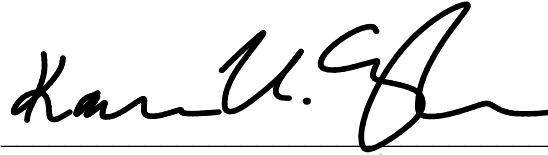
**COUNTY OF** LAUREL

My name is Kareem Crayton, and I make this Declaration pursuant to 28 U. S. C. Section 1746 as follows:

1. I am above the age of eighteen, of sound mind, and fully competent to make this Declaration.
2. I am an adult resident citizen of the State of Maryland, and I have an A. B. Degree (Magna Cum Laude) from Harvard University and a J.D./Ph.D. Degree in law and political science from Stanford University I have performed statistical and data analysis concerning voting patterns and trends by population groups including racial groups and the effects of socio-economic factors on voter turnout patterns and voting behaviors by population groups including racial groups. A true copy of my Curriculum Vitae is attached as Exhibit “1” and incorporated herein.
3. I have analyzed the current demographic data, voting data, and election returns for the current Second Congressional District (“CD2”), the district proposed by House Bill (“H.B. 384”), and the district proposed by the Mississippi State Conference of the National Association for the Advancement of Colored People (“NAACP”). I have prepared a report containing my opinion and conclusions from that analysis. My report and opinions are attached as Exhibit “2” and incorporated herein.
4. I have personal knowledge of the facts contained in my Declaration.

5. All of the facts and matters contained in my Declaration and Exhibits 1 and 2 attached to my Declaration are true and correct.

WITNESS MY SIGNATURE, this the 22<sup>nd</sup> day of February, 2022.

A handwritten signature in black ink, appearing to read 'Kareem U. Crayton', written over a horizontal line.

KAREEM CRAYTON, JD Ph.D.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on the 22<sup>nd</sup> day of February, 2022.

A handwritten signature in black ink, appearing to read 'Kareem U. Crayton', written over a horizontal line.

KAREEM CRAYTON, JD Ph.D.

**KAREEM U. CRAYTON**

e-mail: [kareem@crimcardconsulting.com](mailto:kareem@crimcardconsulting.com)

phone: (334)245-9763

EXHIBIT "1"

**LEADERSHIP EXPERIENCE**

Jul. 2008 – **Crimcard Consulting Services, LLC – Montgomery, AL**  
present *Founder & Managing Partner*

Offers data analysis and guidance to entities desiring insights on law and social science issues. Details found at (<http://kareemcrayton.com/crimcard.html>). Projects include advising on structural reform, redistricting guidance (e.g., advisor to VA Citizens Redistricting Commission and City of Birmingham, AL), litigation strategy (e.g., consultant on *George v. Haslam*, challenging counting rule applied to TN ballot measure), expert witness service (redistricting and civil rights cases), and amicus advocacy (coordinated team of social scientists in the U.S. Supreme Court case *Shelby County v. Holder* and on behalf of PA Senate Democrats showing effects of Voter ID law in *Applewhite v. Commonwealth of Pennsylvania*).

Jan. 2018 – **Southern Coalition for Social Justice – Durham, NC**  
Mar. 2020 *Interim Executive Director*

Guided transition from founding Executive Director. Managed and recruited a staff of approximately 15-20 employees and contractors, including lawyers, researchers, organizers, and new senior leadership. Raised approximately \$1.5 million in new funds from foundations and individual donors, expanding the budget by approximately 25%. Developed vision for the organization's second decade in collaboration with board and staff.

Jan. 2017 – **Alabama House of Representatives – Montgomery, AL**  
Jan. 2018 *Chief of Staff & Special Counsel to House Democratic Caucus*

Assisted in the inaugural term for House Minority Leader Anthony Daniels. Managed staff of approximately 8-10 employees and contractors. Developed legislative research, floor management, and communications strategy for the team and membership. Crafted new plan for fundraising and staffing infrastructure for House Caucus. Established plan and identified/recruited talent for an inaugural statewide caucus policy conference for experts, members, and civic stakeholders. Led team to review and advise members on multiple state policies (tax, health care, budget, education) linked to pending legislation, including a redistricting process to remedy a constitutional violation found by the U.S. Supreme Court.

Feb. 2013 – **Foundation for Society, Law and Art in South Africa**  
present *Founding Board Member & General Counsel*

Established organization to secure the long-term viability of a world-class art collection housed in the Constitutional Court of South Africa. Specific tasks included drafting organizational materials and developing internal protocols for managing donor relationships and engaging foreign partners. The Foundation has



completed approximately half of its goal is to complete a 2 million USD campaign to establish a sustaining endowment for the viability of this collection.

## RESEARCH EXPERIENCE

- Jan. 2016 – **Vanderbilt University Law School – Nashville, TN**  
 Jan. 2017 *Visiting Professor of Law*  
 Taught courses on Constitutional Law & Election Law.
- Aug. 2014 – **University of Alabama School of Law – Tuscaloosa, AL**  
 Dec. 2014 *Visiting Professor of Law*  
 Taught four-week upper level course on voting rights litigation.
- Jul. 2010 – **University of North Carolina School of Law – Chapel Hill, NC**  
 Jul. 2015 *Associate Professor of Law*  
 Taught Law & Social Science, Comparative Constitutional Law, Voting Rights, and Legislation. Served as faculty consultant/advisor in UNC's Institute for African American Studies. Presented comparative research in Canada, Australia, South Africa and Indonesia. Led selection of scholarly articles as special editor for *Journal of Civil Rights & Economic Development*.
- Jul. 2005 – **University of Southern California School of Law – Los Angeles, CA**  
 Jul. 2010 *Assistant/Associate Professor of Law & Political Science*  
 Taught Voting Rights, Civil Procedure, Constitutional Law, Comparative Constitutionalism, and American Politics (undergraduate). Served on university's strategic planning committee. Content and Policy Director for first of its kind innovative online educational simulation for redistricting called ***The Redistricting Game*** ([www.theredistrictinggame.org](http://www.theredistrictinggame.org)). Special editor for scholarship featured in Voting Rights Act edition of *USC Review of Law & Social Justice*.
- Jul. 2005 – **Harvard University – Cambridge, MA**  
 Jul. 2009 *Visiting Scholar/Affiliated Faculty, Department of Government*  
 Collaborated with Department of Government scholars on research; attended interdisciplinary colloquia throughout the university, including the Department of History, Radcliffe Institute, and the Department of African American Studies.

## EDUCATION

- Aug. 1995 – **Stanford University – Palo Alto, CA**  
 Jun. 2002 JD/PhD (Political Science)  
 Dissertation: "What's New About the New South?" Teaching and research assistant in Law, African & African American Studies, and Political Science Departments. Served as graduate student representative on University Provost Search Committee, Faculty Appointment Committee. Awarded NSF Graduate Fellowship and Lane Family Graduate Fellowship. Law Clerk in Republic of South Africa and U.S. Court of Appeals for the DC Circuit.
- Aug. 1992 – **Harvard University – Cambridge, MA**  
 Jun. 1995 A.B. (Government, magna cum laude)

Honors Thesis: “Race, Remedies, and Redistricting: An Empirical Study of Politics and Race in the New South.” Co-Founded Harvard Association Cultivating Inter-American Democracy and Charter Member of Harvard’s Mediation Service. Awarded Harvard College Scholarship and Advanced Placement Scholarship, with Distinction.

#### SELECTED PUBLICATIONS

*Regulation By Charter: Judicial Review of Elections in South Africa*, in YAP PIN JO, ED. JUDICIAL REGULATION OF ELECTION LAW (2016)

*Legislative Politics & the Politics of Legislating*, 14 ELECTION LAW JOURNAL (2015)

*Three Chapters of the American Civil Rights Movement* in TRIUMPHS AND TRAGEDIES OF THE MODERN PRESIDENCY, MAXMILLIAN ANGERHOLZER III, JAMES KITFIELD, CHRIS LU, & NORM ORNSTEIN, eds. (2015)

*Unteachable: Shelby County, Canonical Apostasies, and Ways Forward for Voting Rights*, 67 SMU L. REV. 3 (with Terry Smith) (2014), *reprinted in* 31 CIVIL RIGHTS LITIGATION AND ATTORNEYS FEES ANNUAL HANDBOOK (2015)

*The 1965 Voting Rights Act: Defeating Jim Crow* in TRIUMPHS AND TRAGEDIES OF THE MODERN CONGRESS, MAXMILLIAN ANGERHOLZER III, JAMES KITFIELD, CHRIS LU, & NORM ORNSTEIN, eds. (2014)

*Five Justices, Section 4 & Three Ways Forward in Voting Rights*, 9 DUKE J. OF CONST. LAW & PUB. POL. 113 (with Jane Junn) (2013)

*Gender Unbound? Making Sense of Female Candidates in American Politics*, 80 GEO. WASH. L. REV. 101 (2013)

*Sword, Shield, & Compass: The Uses and Misuses of Racially Polarized Voting in Voting Rights Enforcement*, 64 RUTGERS L. REV. 973 (2012)

*The Changing Face of the Congressional Black Caucus*, 19 S. CAL. INTERDISCIPLINARY L. J. 43 (2010)

*You May Not Get There With Me: Barack Obama and the Black Political Establishment* in BARACK OBAMA AND BLACK POLITICAL EMPOWERMENT, MANNING MARABLE & KRISTEN CLARKE eds. (Palgrave Press, 2009)

*Beat ‘Em or Join ‘Em?: White Voters and Black Candidates in Majority-Minority Districts*, 58 SYRACUSE L. REV. 547 (2007)

#### SELECTED MEDIA & PUBLIC APPEARANCES

Panelist, “Redistricting and the Partisanship at Play,” *Political Rewind Special Edition* Georgia Public Radio (December 27, 2019)

Moderator, Criminal Justice Reform Panel on MCC Theater musical *The Wrong Man* (November 16, 2019)

Panelist, Hometown Debate on NC Voter ID Constitutional Amendment *Spectrum News* (October 5, 2018)

Interview, PBS News Hour, “50 Years on, Does the Voting Rights Act Offer Adequate Protection?” (August 6, 2015)

Op-Ed, “The Confederate Flag Has Become a Trademark for Racism, Despite Its Historic Appeal” Room for Debate, *New York Times* (June 19, 2015)

Interview, PBS News Hour “Was the Supreme Court Ruling a Setback for Voting Rights?” (April 21, 2014)

Op-Ed, “Court Ignores Reality” *USA Today* (June 26, 2013)

Op-Ed, “What Powell v. McCormack Teaches Us About Contemporary Race and Politics” *SCOTUS Blog* (February 24, 2010)

Op-Ed, “The Court's NAMUDNO Decision: Judging the Costs and Efficiency of Preclearance” *Findlaw* (May 26, 2009)

Op-Eds, “Dust Up: The Final Stretch” (Week of election) *LA Times* (October 6-10, 2008)

#### PROFESSIONAL AFFILIATIONS

Member of the Bars of Maryland, District of Columbia, Alabama and U.S. Supreme Court

Member of American Political Science Association, Southern Political Science Association, and American Bar Association



# Memorandum

**To:** Dr. Robert James, President, Mississippi State Chapter, NAACP

**From:** Kareem Crayton, JD/PhD, Manager, Crimcard Consulting Services

**Re:** Political Activity in Mississippi Congressional District 2 (CD2)

**Date:** February 22, 2022

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You have requested an expert report from Crimcard Consulting that provides analysis of the demographic profile of voting communities in the State of Mississippi, focusing on counties that include the current and recently adopted versions of Mississippi's Second Congressional District (CD2).

## **Executive Summary**

The findings contained herein discuss the significant ways in which the recent changes to the map appear to incorporate areas with significant differences from the Delta-based geography that CD2 has traditionally covered.

In multiple ways, the four counties in the southwest portion of the state appear to be a distinct community of interest from the remainder of the district. They tend to have more in common with the proximate counties lying to the east rather than those farther north. This factor should prove a significant consideration in the fashioning of a district that provides an opportunity for black voters to elect candidates of choice.

## **Introduction & Background**

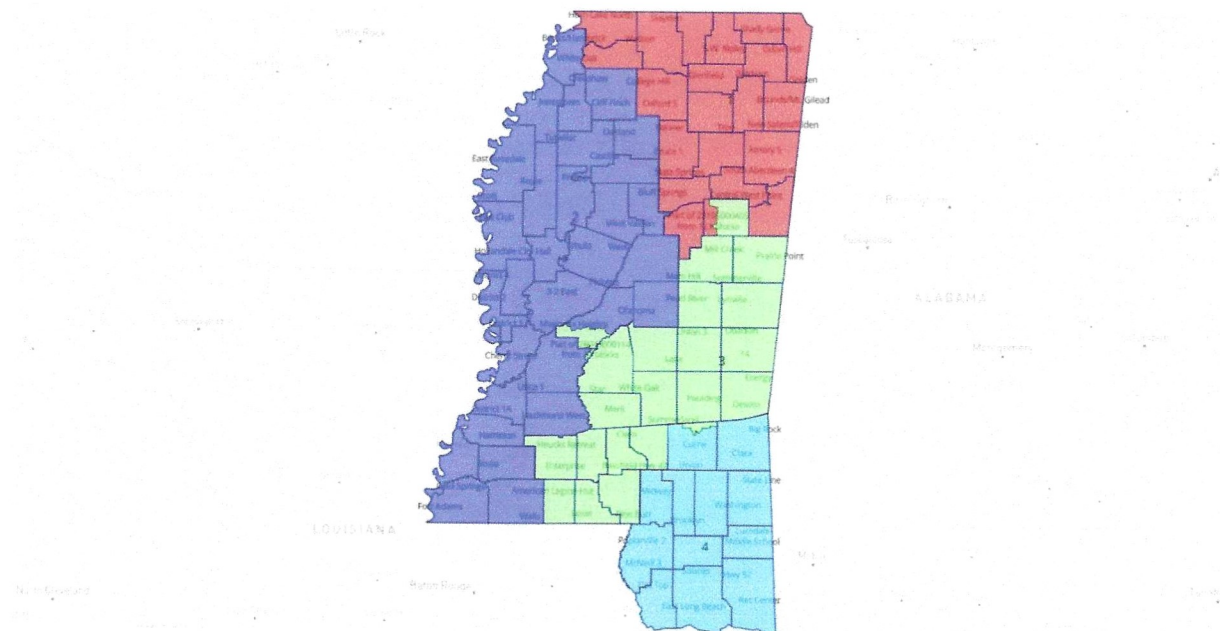
By way of background, The State of Mississippi has recently enacted adjustments in the boundaries of CD2 following the 2020 U.S. Census to comply with the Equal Population Standard interpreted as part of the 14<sup>th</sup> Amendment to the U.S. Constitution.<sup>1</sup> The approved boundary changes for CD2 included adding four new counties in the southwest region of the state – Adams, Franklin, Wilkinson, and Amite. This change expanded the footprint of the congressional district significantly, with the adjusted district's boundaries now running almost the entirety of the state's western river border. The land mass of the district, which was already the largest in

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<sup>1</sup> See Mississippi Redistricting Bill, H.B. 384, found at <https://www.distance-cities.com/distance-natchez-ms-to-jackson-ms>. See also, *Baker v. Carr* 369 U.S. 186 (1962).

the state has grown even larger in the newly adopted map.<sup>2</sup> The state's new configuration of districts is illustrated below in Figure 1:

**FIGURE 1: 2022 MISSISSIPPI APPROVED CONGRESSIONAL PLAN**



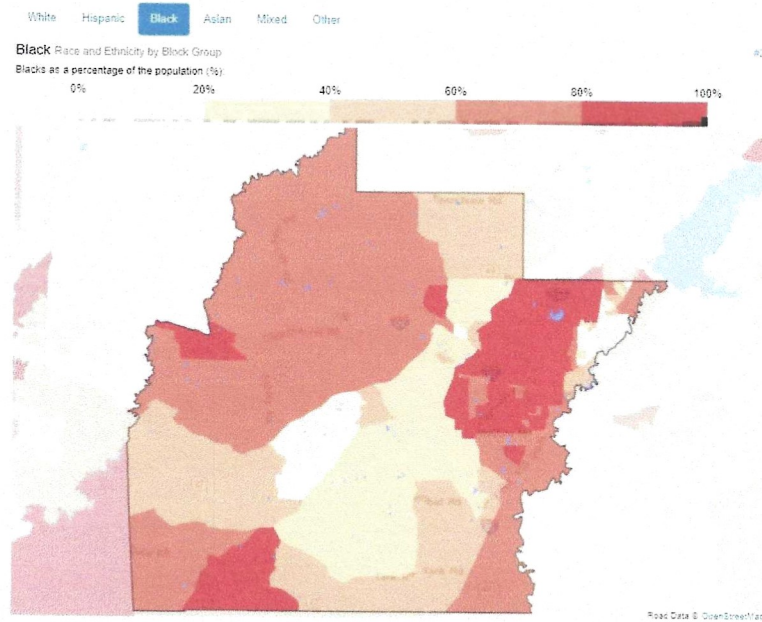
In refashioning the CD2, the State also chose to carve out select portions of Hinds County (in northeast Jackson) and Madison County (the southwest portion of the county) from CD2 and left in CD3; these two geographic areas appear to include significant African American populations. Several of the tracts that were placed in CD3 contain Black populations that exceed 40% of the block's total population. There does not appear to be an obvious policy or legal reason on the record for carving out these particular segments from Mississippi counties that are in large portion already contained within the boundaries of CD2.

Figure 2 (for Hinds) and Figure 3 (for Madison) illustrate the particular Census blocks within each jurisdiction that have significant concentrations of Black population. The shaded areas with colors tending from peach to deep red indicate those areas where the higher Black concentrations located in the county. One can note several of the blocks found in the northeast of Hinds County and the southwest portion of Madison County tend to fall in group of shaded

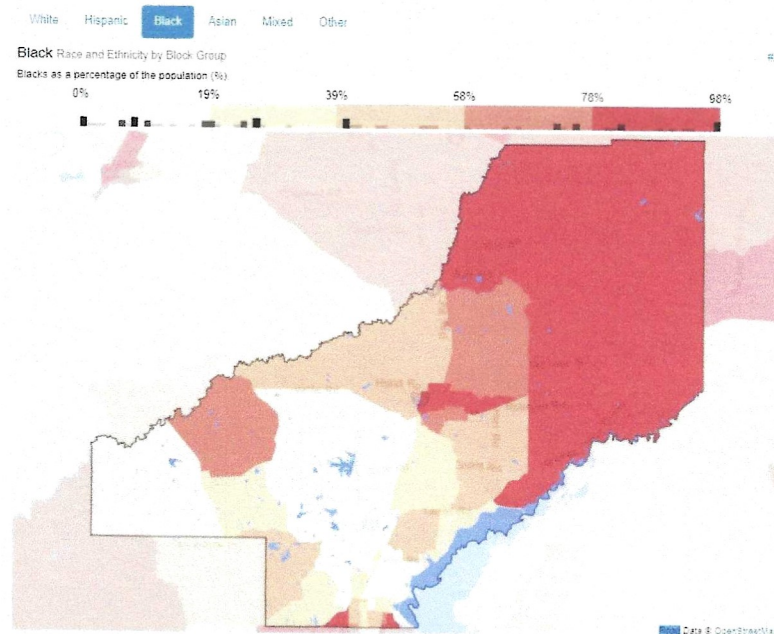
<sup>2</sup> The U.S. Census reports that during the 2010-2020 redistricting era, Mississippi's Second Congressional District was approximately 15,553 square miles. The state's next largest congressional district (District 3) covered 3,000 fewer square miles. Found at <https://censusreporter.org/profiles/50000US2803-congressional-district-3-ms/>.

areas, meaning that CD3 has included more than a few areas with significant Black concentration that might otherwise be placed with CD2:

**FIGURE 2: African American Concentrations in Hinds County Census Block Groups**



**FIGURE 3: African American Concentrations in Madison County Census Block Groups**

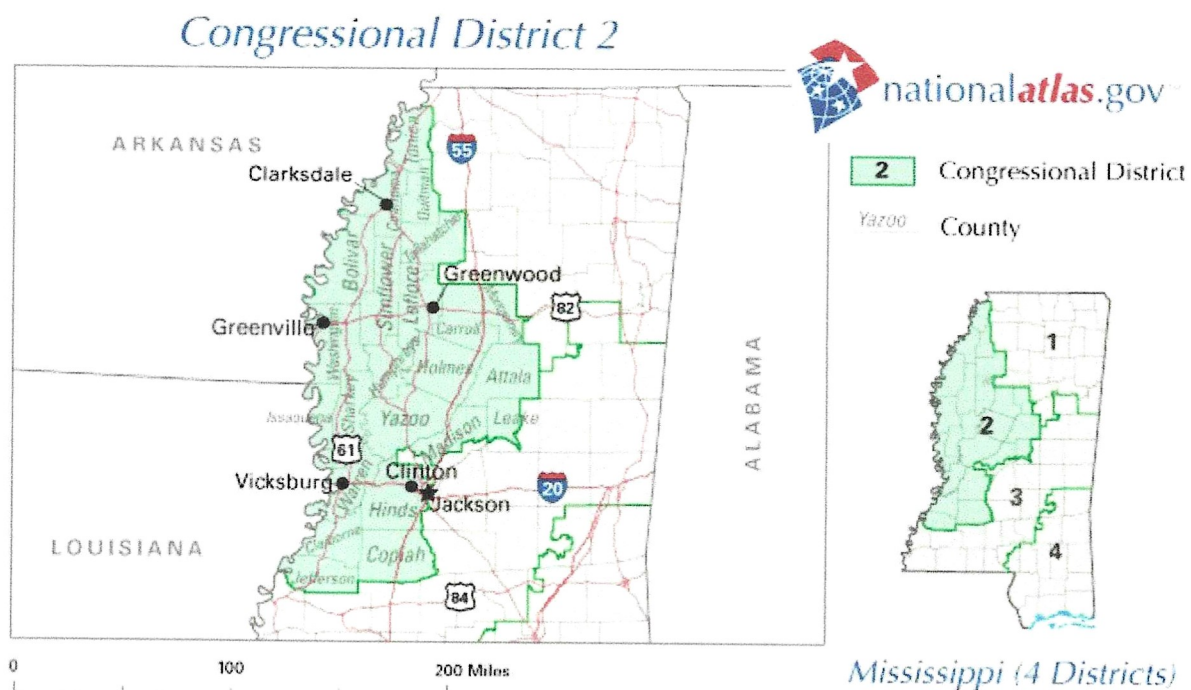




As the illustration of the earlier version of CD2 shown in Figure 4 below confirms, both divided counties were situated in large part within CD2's boundaries at least from its configuration in 2003 through the era of map drawing in Mississippi that followed the 2010 U.S. Census. Notably, the change was after Mississippi's delegation lost a congressional seat.

While they were divided in previous decades of the Congressional District, the counties do appear to be an obvious area where one might have expanded the borders of CD2 to address concerns of population balancing. This is particularly true where the matter of compliance with the anti-discrimination provisions of the Voting Rights Act and the 14<sup>th</sup> Amendment to the Constitution are concerned.

**FIGURE 4: PREVIOUS MISSISSIPPI PLAN FOR CONGRESSIONAL DISTRICT 2**



### Demographic Features

The four focus counties in southwest Mississippi offer a distinct portrait and landscape that is evident in its demographics, both in comparison to the rest of the state and the other segments of CD2. Below is a chart (Table 1) that summarizes key statistics that place the demographic and economic profile of the focus counties in greater context. With the exception of the column

representing the earlier version of CD2 (which comes from the 2019 American Communities Survey), the socio-economic data is compiled in the latest report from the U.S. Census:

TABLE 1: DEMOGRAPHIC MEASURES FOR FOCUS COUNTIES						
Measure	Adams County	Amite County	Franklin County	Wilkinson County	CD 2 (2019) <sup>3</sup>	Mississippi
Population	29,538	12,720	7,675	8,587	692,452	2,962,275
Black Population (%)	56.8%	40.0%	34.5%	70.6%	67.0%	36.6%
Employment Rate	41.1%	42.5%	45.6%	33.6%	48.7%	52.6%
Poverty Rate	31.5%	26.7%	15.1%	34.7%	25.9%	19.6%
College Educated	17.4%	12.6%	12.0%	13.7%	19.0%	22.3%
Median Income	\$29,936	\$33,981	\$40,219	\$27,313	\$37,372	\$45,792
Median Age	41.4	47.1	42.5	37.8	37.4	38.3

Adams County, home to Natchez, is the most urbanized of the four counties with more than 30,000 total people. By contrast, the smallest (and the most economically well-positioned) of the group, Franklin County, has only about 7,600 people. Similarly, there is significant variation among the counties related to their differing levels of racial diversity. Two of the four counties have majority Black populations (Adams and Wilkinson), while the other pair of counties feature significant Black population sizes that are quite comparable to Mississippi's overall Black population of 37%.

The population profiles within these counties all feature similar percentages of college-educated residents that fall below the state average of 22.3% and are below the average for CD2's 19% rate. The median age figures for the counties are generally higher than both CD2 (at 37.4) and the state's median age of 38.3 years; only the median age in Franklin County's population is slightly younger the state median age. Further, the 2020 U.S. Census reports that all four of the counties have experienced population decline during the last decade.

With respect to the economic landscape in these counties, the trend largely trails both CD2 and the state's economic performance. Three of the four counties have a higher-than-average poverty rate compared to the rest of the state by at least five percentage points (the lone exception to the trend is Franklin County, where the rate is below the state average at 15.1%).

<sup>3</sup> Note: The prior version of CD2 is compared here to offer a general comparison of the demographics in counties that were part of CD 2 before the recent changes and the four southwest counties added. See Census Reporter for CD 2, found at <https://censusreporter.org/profiles/50000US2802-congressional-district-2-ms/>.



The rate of employment ranges between seven and twenty percentage points below the Mississippi average of 52.6% (the closest is Franklin County at 45.6%). And the median household income in each these counties tends to trail both CD2 and the state average; tiny Franklin County again rates the closest with a median income level that is approximately \$5,000 less than the statewide figure.

Communities of Interest play a significant role in shaping the political and cultural identity of a county. While the four counties themselves share a common bond of geography in the southwest, there are important contrasts to note about their position vis a vis the rest of the Second Congressional District. As noted earlier, the origins of the congressional district are rooted farther north in the consolidated rural counties in the Delta, and the population center for that district was the Jackson metro area.

The Natchez and McComb population anchors in the southwestern portion of the state have a culturally particular profile that has yielded a distinct political identity in the region. Adams County, home to Natchez, heralds itself as home to Mississippi's first city and McComb's Pike County identifies itself as an outer hub for the Gulf-oriented communities in the state and its neighbors.<sup>4</sup> The influences established in this region during Spanish then French colonial eras continue to define social and cultural traditions here today. Both these cities feature Mardi Gras celebrations that liken to its larger neighboring cities in the Gulf Coast region like Biloxi, New Orleans, and Mobile.<sup>5</sup>

Additionally, the identity of these counties of the southwest as a distinct government and economic community of interest from the rest of CD2 is evident in the way that Mississippi has organized its government and quasi government entities. For example, both the state and federal court systems in Mississippi both have placed these four southwest counties in groupings that extend east-west rather than north-south. The U.S. District Court for the Southern District of Mississippi followed a decision to close the Meridian courthouse with a reorganization with the four counties in a division that links Natchez with McComb rather than with Jackson (which is grouped with counties farther north).<sup>6</sup> Similarly, the Supreme Court of Mississippi organizes its

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<sup>4</sup> See Official City websites, which provide descriptions of historical linkages; City of Natchez, found at <https://www.natchez.ms.us/> and City of McComb, found at <http://www.mccomb-ms.gov/>.

<sup>5</sup> Natchez has a Mardi Gras parade featuring the Krewe of Phoenix, see Official Announcement & Schedule, found at <https://www.natcheztracetravel.com/festivals-events/event/65-natchez-mardi-gras.html>; similarly, McComb now hosts its own official Mardi Gras parade, see City Application, found at: <https://cms2files.revize.com/mccomb/docs/CITY%20OF%20MCCOMB%20MARDI%20GRAS%20PARADE%20UPDATE.pdf>.

<sup>6</sup>According to the District Court, the following county grouping serves as the division centered in Natchez: Pike, Lincoln, Amite, Franklin, Wilkinson, Adams, Jefferson, and Claiborne. Only Jefferson and Claiborne have been part of CD2 prior to 2022. See Divisional List for the Southern District of Mississippi, found at <https://www.mssd.uscourts.gov/divisional-county-listings>.

own elections into three divisions: a Southern, Middle and Northern District. The southern division extends eastward from the four counties and does not cover a single county in CD2.<sup>7</sup>

The pattern is also confirmed in state educational institutions. Southwest Mississippi Community College serves three out of the four counties in this study (the exception, Adams County, features Copiah-Lincoln Community College and a campus of Alcorn State University).<sup>8</sup> The Mississippi Forestry Commission, a state agency charged with protecting wooded areas from wildfire, also distinguishes its southern region (Region 4) from other parts of the state. In fact, the four focus counties of this study are served by a single area officer.<sup>9</sup> The southwest area is also home to a planning and development district that includes the four counties along with Claiborne, Jefferson, Lawrence, Lincoln, Pike, and Walthall Counties.<sup>10</sup> According to its description of the development district, the entity interacts with local and county governments to encourage business expansion and create regional solutions to address economic issues like tourism and solid waste management.

One also sees reflection of a distinct community in the way state politics have defined the region in contrast to areas farther north. As with the neighboring states that border the Gulf of Mexico, Mississippi's Gulf counties have always stood apart from the rest of the state with its own political community. The political representation in U.S. House of Representatives has also maintained separation from areas located farther north in Mississippi. In the modern era of redistricting, for example, the Natchez region has not been combined with the City of Jackson in a single congressional district.

Finally, the geographic proximity of these counties to Louisiana shape identity in ways that make it distinct. The closest state capital to Natchez, in fact, is Baton Rouge, Louisiana – not Jackson.<sup>11</sup> Similarly, the media markets serving the southwest area largely are based in Louisiana (Baton Rouge and New Orleans). This point carries a practical concern for elections and representation in the newly configured district. Campaigning in this refashioned congressional district would now require a more expansive (and expensive) strategy with attention to outlets in the Delta (served partly by Memphis) and Jackson areas.<sup>12</sup> Taken together, the defining characteristics

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<sup>7</sup> See BIPEC Summary of Mississippi Supreme Court Elections (which includes a map of the court's election districts), found at <http://www.bipec.org/2020-mississippi-supreme-court-elections/>.

<sup>8</sup> See Southwest Mississippi Community College Website (including the list of counties in its regional area), found at <https://www.smcc.edu/>.

<sup>9</sup> See Mississippi Forestry Commission Regional offices, found at <https://www.mfc.ms.gov/contact/mfc-directory/regional-offices/>.

<sup>10</sup> See Southwest Mississippi Planning and Development District Official Website (listing service area), found at <http://swmpdd.com/>.

<sup>11</sup> Jackson lies 26 miles farther away than Baton Rouge does from the City of Natchez, according to conventional atlas measures. Distance from Baton Rouge to Natchez, found at <https://www.distance-cities.com/distance-natchez-ms-to-baton-rouge-la>; Distance from Jackson to Natchez, found at <https://www.distance-cities.com/distance-natchez-ms-to-jackson-ms>.

<sup>12</sup> Mounting an expensive campaign would be an especially steep challenge in a congressional district that is among the nation's poorest. Scholars have noted that Black political candidates face this hurdle in ways that many of their White counterparts (including those running in other districts) do not.



that shape how life is lived among southwest residents point heavily away from the more northerly counties of Congressional District 2 and provide a strong basis for regarding this area as a community with its neighboring counties lying more to the east than to the north.<sup>13</sup>

### **Conclusion**

This report has provided a profile of the four southwest Mississippi counties that have been incorporated into CD2 after the 2020 U.S. Census. Key features of the political, cultural, and economic circumstances of these counties tend to distinguish them from other parts of the state. Evidence is available to make the case that this region of Mississippi represents a different community of interest compared to the areas located to the north that are in CD2. This point is confirmed by the different ways that government (federal and state) along with private entities organize their services to the people who live in this area.

Compared to the segments of counties that are already located in CD2 (Hinds and Madison), there are good reasons (and in my opinion, better reasons) to have focused on this more proximate area to expand CD2 for compliance with the equal population standard. The decision would have maintained the Jackson area in a single district, for example. And it would unify an African American population that is both geographically proximate and is affected by many of the same local community issues.

Without some important reasons for dividing this area that is not evident from the information and record reviewed here, the decision to expand CD2 into a third major region of the state is not an obvious one, and it poses special practical challenges for political candidates and voters to organize and communicate in the district that are not present for other districts in the state.

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<sup>13</sup> See, e.g., Smith, Terry (2006) "White Dollars, Black Candidates: Inequality and Agency in Campaign Finance Law," South Carolina Law Review: Vol. 57 : Iss. 4 , Article 5.