

**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;
WILLIAM S. DUFFEY, JR., in his official
capacity as chair of the State Election
Board; MATTHEW MASHBURN, in his
official capacity as a member of the State
Election Board; SARA TINDALL
GHAZAL, 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 JANICE W. JOHNSTON, in
her official capacity as a member of the
State Election Board,

Defendants.

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

**DECLARATION OF JONATHAN P. HAWLEY IN SUPPORT OF
PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, Jonathan P. Hawley, hereby declare under penalty of perjury under the laws
of the United States as follows:

1. I am over the age of 18 and competent to make this declaration. I am an associate with the law firm Elias Law Group LLP and am admitted to practice law in the States of Washington, California, and Montana and the District of Columbia and before multiple federal courts of appeals and district courts. I am admitted in this Court *pro hac vice* in the above-captioned matter as counsel for Plaintiffs. I submit this declaration to provide to the Court true and correct copies of certain documents submitted in support of Plaintiffs' motion for summary judgment.

Exhibit 1 is a true and correct copy of the expert report of William S. Cooper, dated December 5, 2022.

Exhibit 2 is a true and correct copy of the expert report of Dr. Maxwell Palmer, dated December 12, 2022.

Exhibit 3 is a true and correct copy of the supplemental expert report of Dr. Maxwell Palmer, dated December 22, 2022.

Exhibit 4 is a true and correct copy of the expert report of Dr. Orville Vernon Burton, dated December 5, 2022.

Exhibit 5 is a true and correct copy of the expert report of Dr. Loren Collingwood, dated December 12, 2022.

Exhibit 6 is a true and correct copy of the expert report of John B. Morgan, dated January 23, 2023.

Exhibit 7 is a true and correct copy of the expert report of Dr. John R. Alford, dated February 6, 2023.

Exhibit 8 is a true and correct copy of excerpts from the deposition transcript of John B. Morgan, *see* ECF No. 157, dated February 13, 2023.

Exhibit 9 is a true and correct copy of excerpts from the deposition transcript of Dr. John R. Alford, *see* ECF No. 165-2, dated February 23, 2023.

Exhibit 10 is a true and correct copy of the document titled “2021 Committee Guidelines.” The document was published by the Georgia State Senate, was last accessed on March 2, 2023, and is publicly available at: <http://www.senate.ga.gov/committees/Documents/2021RedistrictingCommitteeGuidelines.pdf>.

Exhibit 11 is a true and correct copy of the document titled “2021-2022 Guidelines for the House Legislative and Congressional Reapportionment Committee.” The document was published by the Georgia House of Representatives, was last accessed on March 2, 2023, and is publicly available at: https://www.house.ga.gov/Documents/CommitteeDocuments/2021/Legislative_and_Congressional_Reapportionment/2021-2022%20House%20Reapportionment%20Committee%20Guidelines.pdf.

Exhibit 12 a true and correct copy of the letter from Assistant Attorney General William Bradford Reynolds to Attorney General Michael Bowers, dated

February 11, 1982. The letter was published by the U.S. Department of Justice, was last accessed on March 8, 2023, and is publicly available at: <https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/GA-1870.pdf>.

Exhibit 13 is a true and correct copy of the letter from Assistant Attorney General John R. Dunne to Senior Assistant Attorney General Mark H. Cohen, dated March 20, 1992. The letter was published by the U.S. Department of Justice, was last accessed on March 8, 2023, and is publicly available at: <https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/GA-2360.pdf>.

Exhibit 14 is a true and correct copy of the article entitled “Douglas Leader’s Racial Comments Spark Calls That He Resign.” The article was published by *The Atlanta Journal-Constitution* on September 30, 2016, and is publicly available at: <https://www.ajc.com/news/local/douglas-leader-racial-comments-spark-calls-that-resign/AVjoe8BDCXLsut6OBPjIHI>.

Exhibit 15 is a true and correct copy of the article entitled “GOP Candidate’s Husband Shares Image Urging Voters to ‘Free the Black Slaves from the Democratic Plantation.’” The article was published by CNN on May 2, 2017, and is publicly available at: <https://www.cnn.com/2017/05/02/politics/kfile-karen-handel-husband-tweet/index.html>.

Exhibit 16 is a true and correct copy of the article entitled “Roswell’s Wood Says ‘Ossoff’ Has off-Puttingly Muslim Ring.” The article was published by Appen Media Group on March 15, 2017, and is publicly available at: https://www.appenmedia.com/opinion/columnists/roswell-s-wood-says-ossoff-has-off-puttingly-muslim-ring/article_729681a0-e082-5a2c-a639-9f15369a730a.html.

Exhibit 17 is a true and correct copy of the article entitled “Warring Republicans Try to Unite Against Ossoff in Georgia’s Sixth.” The article was published by *The Atlanta Journal-Constitution* on April 15, 2017, and is publicly available at: <https://www.ajc.com/blog/politics/warring-republicans-try-unite-against-ossoff-georgia-sixth/CJca8W1Alqeob6jvA8gB5H>.

Exhibit 18 is a true and correct copy of the article entitled “Gwinnett Commissioner Calls John Lewis ‘a Racist Pig,’ Faces Backlash.” The article was published by *The Atlanta Journal-Constitution* on January 16, 2017, and is publicly available at: <https://www.ajc.com/news/gwinnett-commissioner-calls-john-lewis-racist-pig-faces-backlash/K2uAUZFikv57szlncpZilO>.

Exhibit 19 is a true and correct copy of the article entitled “Racist ‘Magical Negro’ Robo-Call from ‘Oprah’ Targets Stacey Abrams in Georgia Governor’s Race.” The article was published by *The Washington Post* on November 5, 2018, and is publicly available at: <https://www.washingtonpost.com/politics/2018/11/04/>

racist-magical-negro-robo-call-oprah-targets-stacey-abrams-georgia-governors-race.

Exhibit 20 is a true and correct copy of the article entitled “It Was Too Easy for Brian Kemp’s Last-Minute Dog Whistle About Stacey Abrams to Go Viral.” The article was published by Slate on November 6, 2018, and is publicly available at: <https://slate.com/technology/2018/11/brian-kemp-stacey-abrams-dog-whistle-black-panthers-facebook.html>.

Exhibit 21 is a true and correct copy of the article entitled “Georgia Gubernatorial Candidate Brian Kemp Suggests Truck Is for Rounding up ‘Illegals.’” The article was published by *USA Today* on May 10, 2018, and is publicly available at: <https://www.usatoday.com/story/news/nation/2018/05/10/brian-kemp-illegals-ad/600212002>.

Exhibit 22 is a true and correct copy of the article entitled “Kelly Loeffler’s New Facebook Ad Darkens Skin of Raphael Warnock, Her Black Opponent.” The article was published by Salon on January 4, 2021, and is publicly available at: <https://www.salon.com/2021/01/04/kelly-loefflers-new-facebook-ad-darkens-skin-of-raphael-warnock-her-black-opponent>.

Exhibit 23 is a true and correct copy of the article entitled “Perdue’s Campaign Deletes Ad That Enlarges Jewish Opponent’s Nose, Insists It Was

Accident.” The article was published by ABC News on July 28, 2020, and is publicly available at: <https://abcnews.go.com/Politics/perdues-campaign-deletes-ad-enlarges-jewish-opponents-nose/story?id=72039950>.

Exhibit 24 is a true and correct copy of the article entitled “Georgia Republican Senator Willfully Mispronounces Kamala Harris’ Name at Trump Rally.” The article was published by CNN on October 17, 2020, and is publicly available at: <https://www.cnn.com/2020/10/16/politics/david-perdue-kamala-harris/index.html>.

Exhibit 25 is a true and correct copy of the article entitled “Crime Fears Emerge in Johns Creek, Sandy Springs Municipal Elections.” The article was published by *The Atlanta Journal-Constitution* on October 26, 2021, and is publicly available at: <https://www.ajc.com/neighborhoods/north-fulton/crime-fears-emerge-in-johns-creek-sandy-springs-municipal-elections/HAMJ4MEMVVA3BCYC36ZOGR3OKM>.

Exhibit 26 is a true and correct copy of the document titled “H. Res. 72.” The document was published by the Library of Congress, was last accessed on March 18, 2023, and is publicly available at: <https://www.congress.gov/117/bills/hres72/BILLS-117hres72eh.pdf>.

Exhibit 27 is a true and correct copy of the webpage titled “H.Res.72 - Removing a Certain Member From Certain Standing Committees of the House of Representatives.” The document was published by the Library of Congress, was last accessed on March 18, 2023, and is publicly available at: <https://www.congress.gov/bill/117th-congress/house-resolution/72>.

Dated: March 20, 2023

Respectfully submitted,

By: **Jonathan P. Hawley**
Jonathan P. Hawley*
ELIAS LAW GROUP LLP
1700 Seventh Avenue,
Suite 2100
Seattle, Washington 98101
Phone: (206) 656-0179
Facsimile: (206) 656-0180
Email: JHawley@elias.law

Counsel for Plaintiffs

*Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused to be electronically filed a copy of the foregoing *Declaration of Jonathan P. Hawley in Support of Plaintiffs' Motion for Summary Judgment* with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to counsel of record.

Dated: March 20, 2023

Adam M. Sparks

Adam M. Sparks

Georgia Bar No. 341578

KREVOLIN & HORST, LLC

One Atlantic Center

1201 West Peachtree Street, NW,
Suite 3250

Atlanta, Georgia 30309

Telephone: (404) 888-9700

Facsimile: (404) 888-9577

Email: Sparks@khlawfirm.com

Counsel for Plaintiffs

EXHIBIT 1

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

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

CIVIL ACTION FILE

NO. 1:21-CV-05339-SCJ

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:

I. INTRODUCTION

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 have testified at trial as an expert witness on redistricting and demographics in federal courts in about 50 voting rights cases since the late 1980s. Over 25 of the cases led to changes in local election district plans. Five of the cases resulted in changes to statewide legislative boundaries: *Rural West Tennessee*

African-American Affairs Council, Inc. v. McWherter, No. 92-cv-2407 (W.D. Tenn.); *Old Person v. Brown*, No. 96-cv-0004 (D. Mont.); *Bone Shirt v. Hazeltine*, No. 01-cv-3032 (D.S.D.); *Alabama Legislative Black Caucus v. Alabama*, No. 12-cv-691 (M.D. Ala.); and *Thomas v. Reeves*, No. 18-cv-441 (S.D. Miss.). In *Bone Shirt v. Hazeltine*, the court adopted the remedial plan I developed.

3. I served as the *Gingles* 1 expert for two post-2010 local-level Section 2 cases in Georgia, *Georgia State Conference of NAACP v. Fayette County Board of Commissioners*, No. 11-cv-123 (N.D. Ga.), and *Georgia State Conference of NAACP v. Emanuel County Board of Commissioners*, No. 16-cv-21 (S.D. Ga.). In both cases, the parties settled on redistricting plans that I developed (with input from the respective defendants). In the latter part of the decade, I served as the *Gingles* 1 expert in three additional Section 2 cases in Georgia, which were all voluntarily dismissed in advance of the 2020 elections: *Georgia State Conference of NAACP v. Gwinnett County Board of Commissioners*, No. 16-cv-2852 (N.D. Ga.); *Thompson v. Kemp*, No. 17-cv-1427 (N.D. Ga.); and *Dwight v. Kemp*, No. 18-cv-2869 (N.D. Ga.).

4. In 2022, I testified as an expert in redistricting and demographics in six cases challenging district boundaries under Section 2 of the Voting Rights Act: *Caster v. Merrill*, No. 21-1356-AMM (N.D. Ala.); *Alpha Phi Alpha Fraternity v. Raffensperger*, No. 21-05337-SCJ (N.D. Ga.); *Pendergrass v. Raffensperger*, No. 21-

05339-SCJ (N.D. Ga.); *NAACP v. Baltimore County*, No.21-cv-03232-LKG (D. Md.); *Christian Ministerial Alliance v. Hutchinson*, No. 4:19-cv-402-JM (E.D. Ark.); and *Robinson v. Ardoin*, No. 3:22-cv-00211-SDD-SDJ (M.D. La.). I also testified at trial this year as an expert on demographics in *NAACP v. Lee*, No. 4:21cv187-MW/MAF (N.D. Fla.), a case involving recent changes to Florida’s election law.

5. Since the release of the 2020 Census data, three county commission-level plans I developed as a private consultant have been adopted by local governments, in San Juan County, Utah; Bolivar County, Mississippi; and Washington County, Mississippi. In addition, a school board plan I developed was adopted by the Jefferson County, Alabama Board of Education (*Stout v. Jefferson County*).

6. My redistricting experience is further documented in **Exhibit A**.

7. I am being compensated at a rate of \$150.00 per hour. No part of my compensation is dependent upon the conclusions that I reach or the opinions that I offer.

A. Purpose of Declaration

8. The attorneys for the Plaintiffs in this case asked me to determine whether the African American¹ population in Georgia is “sufficiently large and

¹ In this declaration, “African American” refers to persons who are Single Race Black or Any Part Black (i.e., persons of two or more races and some part Black), including Hispanic Black. In some instances (e.g., for historical comparisons), numerical or percentage references identify Single Race Black as “SR Black” and Any Part Black as “AP Black.” Unless noted otherwise, “Black” means AP Black. It is my understanding that following the U.S. Supreme Court decision in

geographically compact”² to allow for the creation of an additional majority-Black congressional district in the Atlanta metropolitan area.

9. **Exhibit B** describes the sources and methodology I have employed in the preparation of this report and the Illustrative Plan. In short, I used the Maptitude for Redistricting software program as well as data and shapefiles from the U.S. Census Bureau and the Georgia Legislative and Congressional Reapportionment Office, among other sources.

B. Expert Conclusions

10. The Black population in metropolitan Atlanta is sufficiently numerous and geographically compact to allow for the creation of an additional majority-Black congressional district anchored in Cobb, Douglas, and Fulton Counties (CD 6 in the Illustrative Plan) consistent with traditional redistricting principles.

11. The additional majority-Black congressional district can be merged into the enacted 2021 Plan without making changes to six of the 14 districts: CD 1, CD 2, CD 5, CD 7, CD 8, and CD 12 are unaffected.

Georgia v. Ashcroft, 539 U.S. 461 (2003), the “Any Part” definition is an appropriate Census classification to use in most Section 2 cases.

² This is the first *Gingles* precondition. See *Thornburg v. Gingles*, 478 U.S. 30 (1986).

C. Organization of Declaration

12. The remainder of this declaration is organized as follows: **Section II** reviews state-level and Metro Atlanta 1990–2020 demographics, as defined by the 29-county Atlanta-Sandy Springs-Alpharetta MSA.³ **Section III** provides maps and population statistics for the 2012 Benchmark Plan and the enacted 2021 Plan. **Section IV** presents the Illustrative Plan that I have prepared, based on the 2020 Census, which includes an additional majority-Black district in Metro Atlanta.

II. DEMOGRAPHIC PROFILE

A. Georgia: 2010 to 2020

13. According to the 2020 Census, Georgia has a total population of 10,711,908 persons—up by 1.02 million since 2010.

³ In this declaration, Metro Atlanta refers to the 29-county Atlanta-Sandy Springs-Alpharetta Metropolitan Statistical Area (“MSA”). It includes the counties of Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spalding, and Walton.

MSA is an abbreviation for “metropolitan statistical area.” Metropolitan statistical areas are defined by the U.S. Office of Management and Budget and reported in historical and current census data produced by the U.S. Census Bureau. As the Census Bureau has explained, “[m]etropolitan statistical areas consist of the county or counties (or equivalent entities) associated with at least one urbanized area of at least 50,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties.” Source: <https://www.census.gov/programs-surveys/metro-micro/about/glossary.html>.

14. **Figure 1** reveals that Georgia’s population growth since 2010 can be attributed entirely to gains in the overall minority population.

Figure 1
Georgia: Population by Race and Ethnicity (2010 Census to 2020 Census)

	2010 Population	Percent	2020 Population	Percent	2010–2020 Change (Persons)	2010–2020 Change (Percent)
Total Population	9,687,653	100.00%	10,711,908	100.00%	1,024,255	10.57%
NH White*	5,413,920	55.88%	5,362,156	50.06%	-51,764	-0.96%
Total Minority Population	4,273,733	44.12%	5,349,752	49.94%	1,076,019	25.18%
Latino	853,689	8.81%	1,123,457	10.49%	269,768	31.60%
NH Black*	2,910,800	30.05%	3,278,119	30.60%	367,319	12.62%
NH Asian*	311,692	3.22%	475,680	4.44%	163,988	52.61%
NH Hawaiian and Pacific Islander	5,152	0.05%	6,101	0.06%	949	18.42%
NH American Indian and Alaska Native*	21,279	0.22%	20,375	0.19%	-904	-4.25%
NH Other*	19,141	0.20%	55,887	0.52%	36,746	191.98%
NH Two or More Races*	151,980	1.57%	390,133	3.65%	238,153	156.70%
SR Black	2,950,435	30.46%	3,320,513	31.00%	370,078	12.54%
AP Black	3,054,098	31.53%	3,538,146	33.03%	484,048	15.85%

*Single race, non-Hispanic

15. Between 2010 and 2020, the Black population in Georgia increased by 484,048 persons. By contrast, during the same decade, the non-Hispanic White (“NH White”) population fell by 51,764 persons.

16. Georgia's Black population, as a share of the overall statewide population, increased between 2010 and 2020, from 31.53% in 2010 to 33.03% in 2020.

17. Non-Hispanic Whites are a razor-thin majority of the state's 2020 population (50.06%). Black Georgians account for one-third (33.03%) of the population and comprise the largest minority population, followed by Latinos (10.49%).

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B. Georgia: Voting Age and Citizen Voting Age

18. As shown in **Figure 2**, African Americans in Georgia constitute a slightly smaller percentage of the voting age population (“VAP”) than the total population. According to the 2020 Census, Georgia has a total VAP of 8,220,274 persons, of whom 2,607,986 (31.73%) are AP Black. The NH White VAP is 4,342,333 (52.82%).

Figure 2
Georgia: 2020 Voting Age and 2021 Estimated Citizen Voting Age
Populations by Race and Ethnicity⁴

	2020 VAP (Persons)	2020 VAP (Percent)	2021 CVAP (Percent)
Total	8,220,274	100.00%	100.0%
NH White	4,342,333	52.82%	55.7%
Total Minority	3,877,941	47.18%	44.3%
Latino	742,918	9.04%	5.9%
SR Black	2,488,419	30.27%	31.4%
AP Black	2,607,986	31.73%	33.3%

19. The rightmost column in Figure 2 reveals that both the Black and NH White populations comprise a higher percentage of the citizen voting age population

⁴ To prepare this table, I relied on the PL 94-171 redistricting file issued by the Census Bureau; Table S2901 of the 1-Year 2021 American Community Survey (“ACS”), available at <https://data.census.gov/cedsci/table?q=S2901&g=0400000US13&tid=ACSST1Y2021.S2901>; and the Public Use Microdata Sample of the 1-Year 2021 ACS, available at <https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2021&vv=AGEP%2800,18%3A99%29&cv=RACBLK%281%29&r v=ucgid,CIT%281,2,3,4,%29&wt=PWGTP&g=0400000US13>.

(“CVAP”) than the corresponding voting age population, owing to higher non-citizenship rates among other minority populations.

20. According to estimates from the 1-Year 2021 American Community Survey (“ACS”), African Americans represent 33.3% of the statewide CVAP—about 1.5 percentage points higher than the 2020 AP Black VAP. The NH White CVAP is 55.7%—nearly three percentage points higher than NH White VAP in the 2020 Census.

21. The Black CVAP in Georgia is poised to go up this decade. According to the 1-Year 2021 ACS, Black citizens of all ages represent 34.45% of all citizens.⁵

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⁵ Source: <https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2021&vv=AGEP&cv=RACBLK%281%29&rv=ucgid,CIT%281,2,3,4%29&wt=PWGTP&g=0400000US13>.

C. Black Population as a Component of Total Population: 1990 to 2020

1. Georgia

22. As shown in **Figure 3**, Georgia's Black population has increased significantly in absolute and percentage terms since 1990, from about 27% in 1990 to 33% in 2020. Over the same time period, the percentage of the population identifying as NH White has dropped from 70% to 50%.

Figure 3
Georgia: Population by Race and Ethnicity (1990 Census to 2020 Census)

	1990 Population	Percent	2000 Population	Percent	2010 Population	Percent	2020 Population	Percent
Total Population	6,478,216	100.00%	8,186,453	100.00%	9,687,653	100.0%	10,711,908	100.00%
NH White	4,543,425	70.13%	5,128,661	62.65%	5,413,920	55.88%	5,362,156	50.06%
Total Minority Population	1,934,791	29.87%	3,057,792	37.35%	4,273,733	44.12%	5,349,752	49.94%
Latino	108,922	1.68%	435,227	5.32%	853,689	8.81%	1,123,457	10.49%
Black*	1,746,565	26.96%	2,393,425	29.24%	3,054,098	31.53%	3,538,146	33.03%

*SR Black in 1990; AP Black 2000–2020

23. Since 1990, the Black population has more than doubled: from about 1.75 million to 3.54 million, an increase that is the equivalent of the populations of more than two congressional districts. The NH White population has also increased, but at a much slower rate: from 4.54 million to 5.36 million, amounting to an increase of only about 18% over the three-decade period.

2. Metro Atlanta

24. **Exhibit C** is a Census Bureau-produced map showing boundaries for the Atlanta MSA, along with other metropolitan and micropolitan areas in Georgia.

25. **Figure 4** demonstrates that the key driver of population growth in Georgia this century has been Metro Atlanta, led in no small measure by a large increase in the Black population.

Figure 4
Metro Atlanta: Population by Race and Ethnicity (1990 Census to 2020 Census)

	1990 Population	Percent	2000 Population	Percent	2010 Population	Percent	2020 Population	Percent
Total Population	3,082,308	100.00%	4,263,438	100.00%	5,286,728	100.00%	6,089,815	100.00%
NH White	2,190,859	71.08%	2,576,109	60.42%	2,684,571	50.78%	2,661,835	43.71%
Total Minority Population	891,449	28.92%	1,687,329	39.58%	2,602,157	49.22%	3,427,980	56.29%
Latino	58,917	1.91%	270,655	6.35%	547,894	10.36%	730,470	11.99%
Black*	779,134	25.28%	1,248,809	29.29%	1,776,888	33.61%	2,186,815	35.91%

*SR Black in 1990; AP Black 2000–2020

26. According to the 1990 Census, the area that today comprises the 29-county MSA was 25.28% Black, increasing to 35.91% in 2020. Since 2000, the Black population in Metro Atlanta has climbed by 75%: from 1.25 million in 2010 to 2.19 million in 2020.

27. According to the 2020 Census, a majority of Metro Atlanta residents are non-White, while NH Whites comprise 43.71% of the Metro Atlanta population. This is a major shift compared to the previous decade; in 2010, NH Whites represented 50.78% of the Metro Atlanta population.

28. According to the 2020 Census, the 11 core counties comprising the Atlanta Regional Commission (“ARC”) service area⁶ account for more than half (54.7%) of the statewide Black population. After expanding the region to include the 29 counties in the Atlanta MSA (including the 11 ARC counties), Metro Atlanta encompasses 61.81% of the state’s Black population.

29. **Exhibit D** breaks down Black population changes from 2010 to 2020 by county for each of the 29 counties in Metro Atlanta.

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⁶ Source: <https://atlantaregional.org/atlanta-region/about-the-atlanta-region>.

30. **Figure 5** shows that the population gain in Metro Atlanta between 2010 and 2020 amounted to 803,087 persons—greater than the population of one of the state’s congressional districts—with more than half of the gain coming from an increase in the Black population, which increased by 409,927 (or 23.07%). Meanwhile, over the same decade, the NH White population in Metro Atlanta fell by 22,736 persons.

Figure 5
Metro Atlanta: Population by Race and Ethnicity (2010 Census to 2020 Census)

	2010 Number	Percent	2020 Number	Percent	2010–2020 Change (Persons)	2010–2020 Change (Percent)
Total Population	5,286,728	100.00%	6,089,815	100%	803,087	15.19%
NH White*	2,684,571	50.78%	2,661,835	43.7%	-22,736	-0.85%
Total Minority Population	2,602,157	49.22%	3,427,980	56.3%	825,823	31.74%
Latino	547,894	10.36%	730,470	12.0%	182,576	33.32%
NH Black*	1,684,178	31.86%	2,019,208	33.16%	335,030	19.89%
NH Asian*	252,616	4.78%	397,009	6.52%	144,393	57.16%
NH Hawaiian and Pacific Islander*	2,075	0.04%	2,386	0.04%	311	14.99%
NH American Indian and Alaska Native*	10,779	0.20%	10,562	0.17%	-217	-2.01%
NH Other*	13,749	0.26%	39,254	0.64%	25,505	185.50%
NH Two or More Races*	126,322	2.39%	229,091	3.76%	102,769	81.35%
SR Black	1,712,121	32.39%	2,048,212	33.63%	336,091	19.63%
AP Black	1,776,888	33.61%	2,186,815	35.91%	409,927	23.07%

*Single race, non-Hispanic

31. As shown in **Figure 6**, according to the 2020 Census, the 29-county MSA has a total VAP of 4,654,322 persons, of whom 1,622,469 (34.86%) are AP Black. The NH White VAP is 2,156,625 (46.34%).

Figure 6
Metro Atlanta: 2020 Voting Age and 2021 Estimated Citizen Voting Age Populations by Race and Ethnicity⁷

	2020 VAP (Persons)	2020 VAP (Percent)	2021 CVAP (Percent)
Total	4,654,322	100.00%	100.00%
NH White	2,156,625	46.34%	49.8%
Total Minority	2,426,643	53.66%	50.2%
Latino	487,286	10.47%	6.6%
SR Black	1,541,370	33.12%	34.6%
AP Black	1,622,469	34.86%	N/A

32. According to estimates from the 1-Year 2021 ACS, SR African Americans represent 34.6% of the CVAP in Metro Atlanta—about 1.5 percentage points higher than the 2020 SR Black VAP. The NH White CVAP is 49.8%, about 3.5 percentage points higher than the NH White VAP in the 2020 Census.

33. Despite the significant Black population growth in Metro Atlanta, the region includes just three majority-Black districts under the 2021 Plan—CD 4, CD 5, and CD 13—the same number the region has had for the past two decades.

⁷ To prepare this table, I relied on the PL 94-171 redistricting file issued by the U.S. Census Bureau and Table S2901 of the 1-Year 2021 ACS, available at <https://data.census.gov/table?q=S2901&g=310XX00US12060>. The Census Bureau does not publish a citizenship estimate for the AP Black CVAP at the MSA level.

34. As shown in **Figure 7**, over the two decades since the last majority-Black district (CD 13) was drawn, Metro Atlanta’s population has grown by 1.8 million, with the Black population up by 938,006.

Figure 7
29-County MSA (Metro Atlanta): 2000 to 2020 Population Change

	2000 Population (Persons)	2000 Population (Percent)	2020 Population (Persons)	2020 Population (Percent)	2000–2020 Change (Persons)	2000–2020 Change (Percent)
Total Population	4,263,438	100.00%	6,089,815	100.00%	1,826,377	42.84%
NH White	2,576,109	60.42%	2,661,835	43.71%	85,726	3.33%
Total Minority Population	1,687,329	39.58%	3,427,980	56.29%	1,740,651	103.16%
Latino	270,655	6.35%	730,470	11.99%	459,815	169.89%
AP Black	1,248,809	29.29%	2,186,815	35.91%	938,006	75.11%

35. Given the dramatic increase in Georgia’s Black population in Metro Atlanta during this century, the obvious focal point for determining whether an additional majority-Black district can be created in the state is indeed Metro Atlanta. And, as shown below, a new majority-Black district can readily be created in and around Cobb, Douglas, and Fulton Counties.

III. 2012 BENCHMARK PLAN AND 2021 PLAN

A. 2012 Benchmark Plan

36. **Exhibit E** contains a map packet depicting the 2012 Benchmark Plan, with corresponding 2010 Census statistics, prepared by the Georgia Legislative & Congressional Reapportionment Office (“GLCRO”).

37. **Exhibit F** is a table that I prepared reporting 2020 Census population statistics for the 2012 Plan, as well as CVAP estimates from the Census Bureau’s 2015–2019 Special Tabulation.⁸

B. 2021 Plan

38. **Exhibit G** contains a map packet depicting the 2021 Plan, with corresponding 2020 Census statistics, prepared by GLCRO.

39. Additional 2021 Plan information regarding compactness scores, county splits, municipal splits, and VTD⁹ splits is reported for comparison with the Illustrative Plan described in the next section.

40. The 2021 Plan reduces CD 6’s BVAP from 14.6% under the 2012 Benchmark Plan to 9.9%. This decrease occurred in an area that has experienced significant growth in the Black population since the 2010 Census. Notably, the area is adjacent to two majority-Black districts (CD 4 and CD 13) with Black citizen voting age populations (“BCVAP”) in the 60% range under both the Benchmark 2012 Plan and the 2021 Plan.

41. According to the 2020 Census, the BVAP in the (by then overpopulated) Benchmark 2012 CD 13 was 62.65%. Under the 2021 Plan, the BVAP in CD 13

⁸ Source: <https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>.

⁹ “VTD” is a U.S. Census Bureau term; VTDs generally correspond to precincts. Statewide, in 2020, there were 2,698 VTDs in Georgia.

jumps to 66.75%. Indeed, the BVAP in CD 13 has steadily increased over the past two decades. According to the 2010 Census, under the then-overpopulated Benchmark 2006 Plan, the BVAP in CD 13 stood at 55.70%.

42. As shown in **Figure 8**, based on the 2020 Census, the combined Black population in Cobb, Fulton, Douglas, and Fayette Counties is 807,076 persons, more than necessary to constitute an *entire* congressional district—or, put differently, a majority in two congressional districts.

Figure 8
Four-County Area: 2010 Census to 2020 Census Population and Black Population Changes

	2020 Population	2020 Black Population	2010–2020 Population Change	2010–2020 Black Population Change	Black Population Change as Percentage of Total Change
Cobb	766,149	223,116	78,071	42,151	53.99%
Douglas	144,237	74,260	11,834	20,007	169.06%
Fayette	119,194	32,076	12,627	9,578	75.85%
Fulton	1,066,710	477,624	146,129	60,732	41.56%
Total	2,096,290	807,076	248,661	132,468	53.27%

43. More than half (53.27%) of the total population increase in the four counties since 2010 can be attributed to the increase in the Black population. Building off this growth, the Illustrative Plan described in the next section shows how an additional majority-Black congressional district can be drawn in the area encompassing Cobb, Fulton, Douglas, and Fayette Counties—with no meaningful

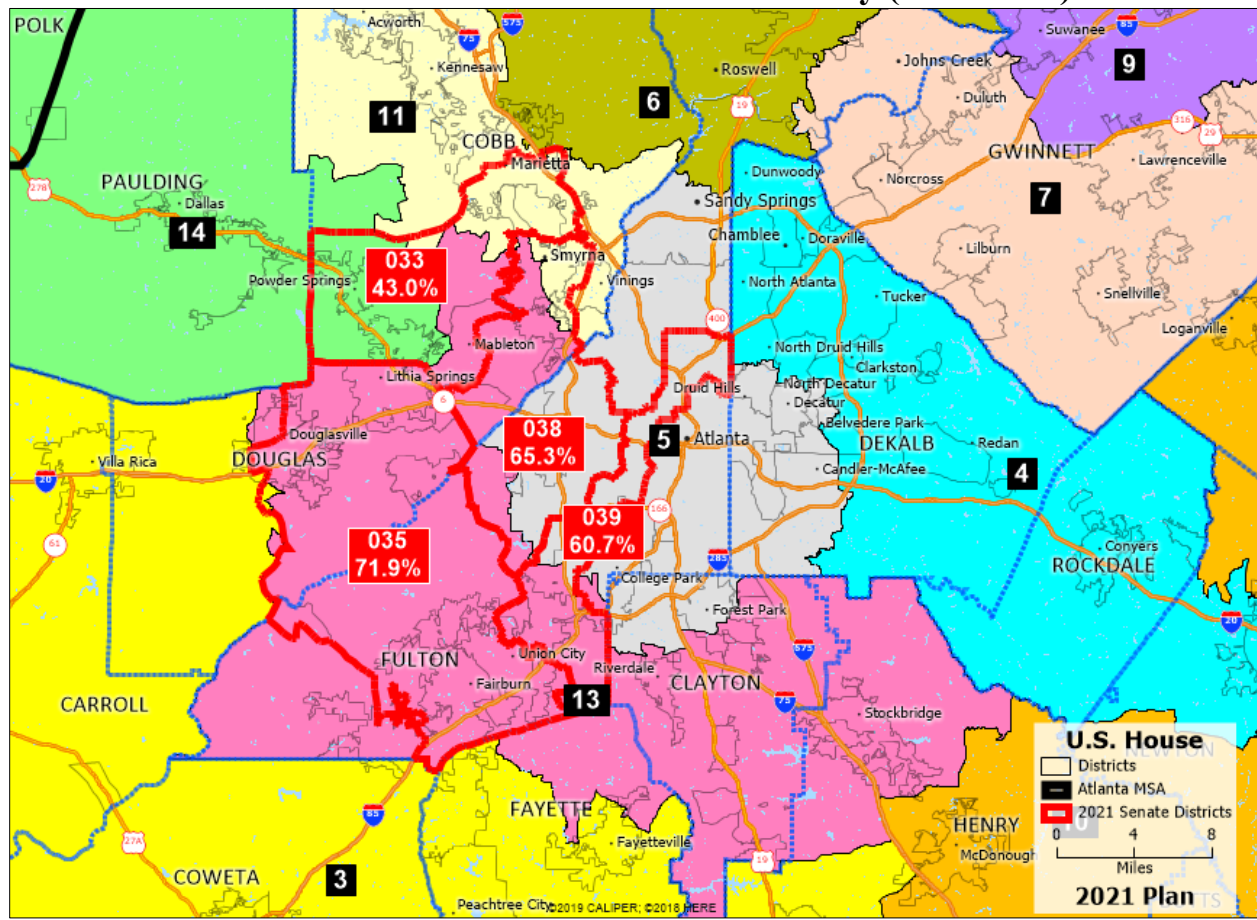
impact on compactness and fewer splits of political subdivisions (i.e., counties, VTDs, and municipalities).

44. Indeed, that an additional majority-Black district can readily be drawn in this four-county area is confirmed by the composition of newly enacted Georgia State Senate districts in Metro Atlanta. The enacted 2021 Senate Plan includes three majority-Black districts that encompass parts of western Fulton County, southern Cobb County, and eastern Douglas County, and a fourth racially diverse Senate district in Cobb County.

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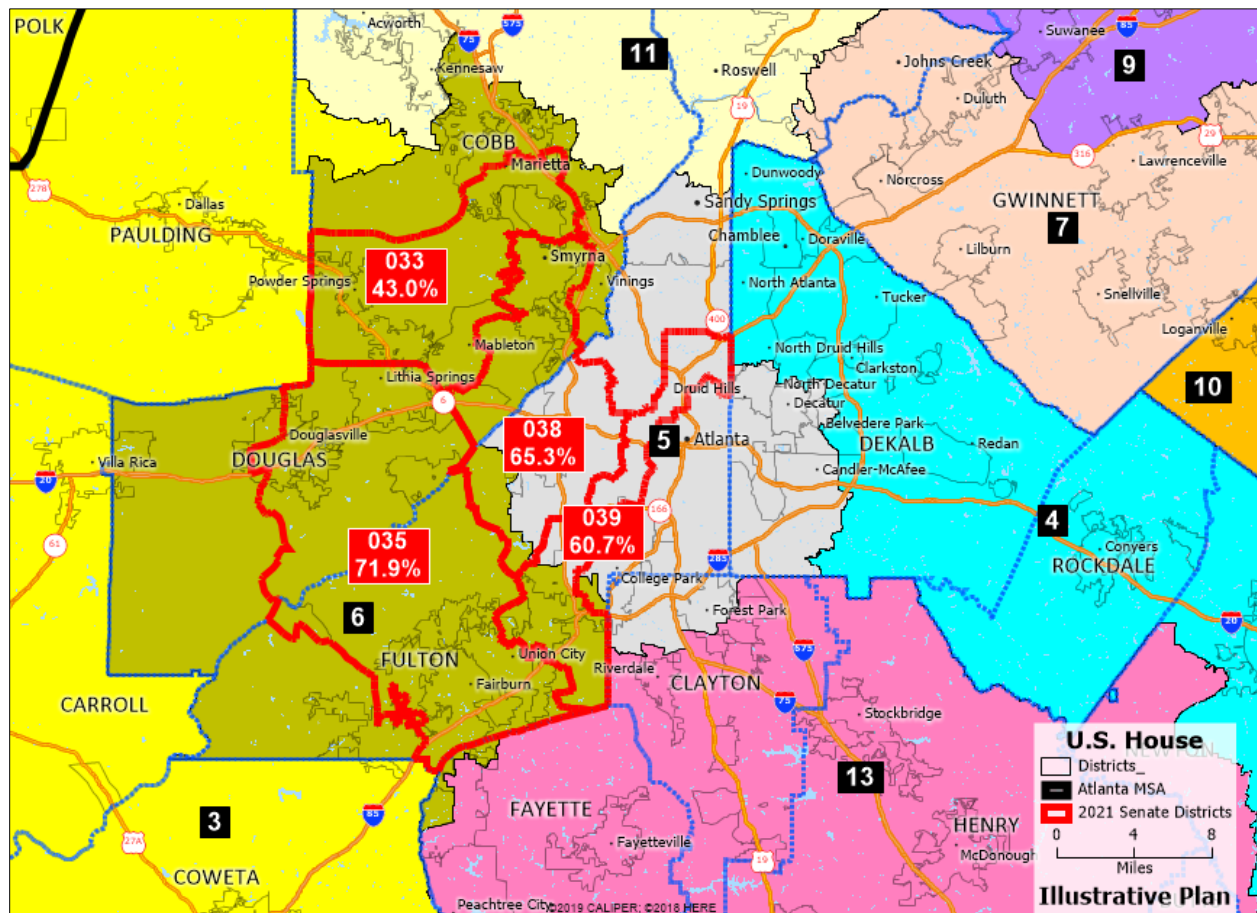
45. With respect to ideal district population size, four Senate districts are exactly the equivalent of one congressional district, given that 56 (the number of Senate districts) divided by 14 (the number of congressional districts) equals four. And, as shown in **Figure 9** below, there is ample room to create an additional majority-Black congressional district in the three-county area generally defined by three majority-Black and one racially diverse Senate districts in the enacted 2021 Senate Plan: SD 39 (approximately 61% BVAP), SD 35 (72% BVAP), SD 38 (60% BVAP), and Cobb County SD 42 (43% BVAP).

Figure 9
2021 Plan with Partial Senate Plan Overlay (Red Lines)



46. **Figure 10** below is a preview of the Illustrative Plan described in the next section. Note how majority-Black Illustrative CD 6 closely aligns with the four Senate districts displayed in Figure 8, and then extends west to include all of Douglas County, south to include all of southern Fulton County, and north into racially diverse areas of Cobb County.

Figure 10
Illustrative Plan with Partial Senate Plan Overlay (Red Lines)



IV. Illustrative Plan

A. Traditional Redistricting Principles

47. The Illustrative Plan I have prepared demonstrates that the Black population is sufficiently numerous and geographically compact to allow for the creation of an additional majority-Black congressional district in Metro Atlanta.

48. The Illustrative Plan adheres to traditional redistricting principles, including population equality, compactness, contiguity, respect for political subdivision boundaries, respect for communities of interest, and the non-dilution of minority voting strength.

49. I drew the Illustrative Plan to follow, to the extent possible, county boundaries. Where counties are split to comply with one-person, one-vote requirements, I have generally used whole 2020 Census VTDs as sub-county components. Where VTDs are split, I have followed census block boundaries that are aligned with roads, natural features, municipal boundaries, census block groups, and post-2020 Census county commission districts.

50. In drafting the Illustrative Plan, I sought to minimize changes to the 2021 Plan while abiding by all of the traditional redistricting principles listed above. I balanced all of these considerations, and no one factor predominated in my drawing of the Illustrative Plan.

51. The result leaves intact six congressional districts in the enacted plan, modifying only eight districts in the 2021 Plan to create an additional majority-Black district (Illustrative CD 6) encompassing all of Douglas County and parts of Cobb, Fayette, and Fulton Counties. The eight districts that are changed under the Illustrative Plan are CD 3, CD 4, CD 6, CD 9, CD 10, CD 11, CD 13, and CD 14.

52. The districts in the Illustrative Plan are also contiguous.

53. As shown in **Figure 11**, the Illustrative Plan abides by the one-person, one-vote principle. Like the 2021 Plan, population deviations in the Illustrative Plan are plus or minus one person from the ideal population size of 765,136.

Figure 11
Illustrative Plan Population Summary

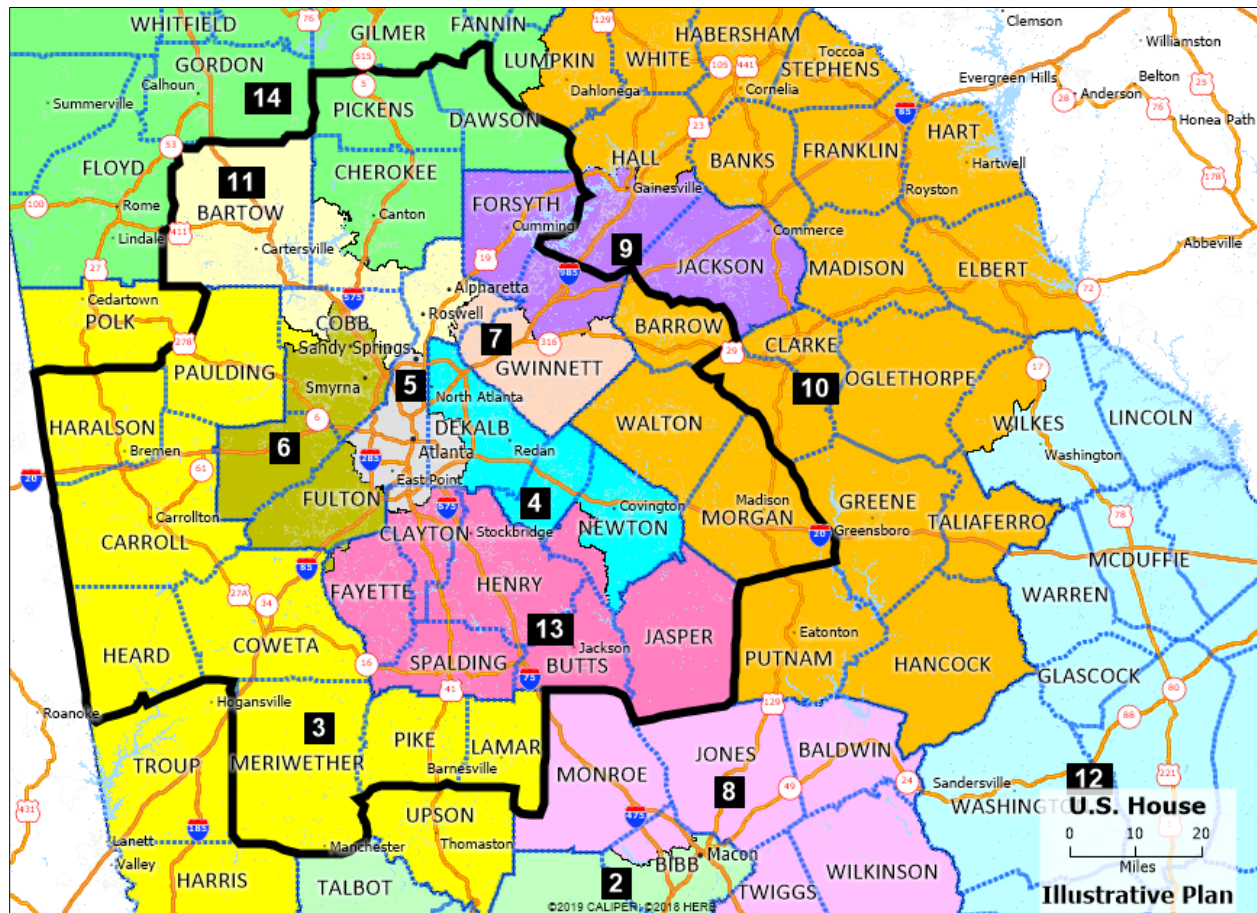
District	Population	Deviation	AP Black	% AP Black	Latino	% Latino	NH White	% NH White
1	765,137	1	230,783	30.16%	59,328	7.75%	440,636	57.59%
2	765,137	1	393,195	51.39%	45,499	5.95%	305,611	39.94%
3	765,135	-1	166,096	21.71%	49,935	6.53%	517,659	67.66%
4	765,136	0	410,019	53.59%	87,756	11.47%	212,004	27.71%
5	765,137	1	392,822	51.34%	56,496	7.38%	273,819	35.79%
6	765,137	1	396,891	51.87%	108,401	14.17%	225,985	29.54%
7	765,137	1	239,717	31.33%	181,851	23.77%	225,905	29.52%
8	765,136	0	241,628	31.58%	54,850	7.17%	443,123	57.91%
9	765,136	0	94,059	12.29%	128,393	16.78%	429,340	56.11%
10	765,137	1	118,199	15.45%	61,244	8.00%	548,312	71.66%
11	765,137	1	110,368	14.42%	81,466	10.65%	492,121	64.32%
12	765,136	0	294,961	38.55%	43,065	5.63%	398,843	52.13%
13	765,135	-1	404,963	52.93%	71,377	9.33%	253,135	33.08%
14	765,135	-1	44,445	5.81%	93,796	12.26%	595,663	77.85%
Total	10,711,908	N/A	3,538,146	33.03%	1,123,457	10.49%	5,362,156	50.06%

54. **Exhibit I-1** contains additional voting age and citizen voting age summaries by district.

B. Illustrative Plan Overview

55. The map in **Figure 12** depicts Metro Atlanta with an overlay of the Illustrative Plan. CD 6, the additional majority-Black district, is anchored in Cobb, Douglas, and Fulton Counties, along with a small part of Fayette County.

Figure 12
Illustrative Plan: Metro Atlanta



56. **Exhibit H-1** is a higher resolution of the Figure 10 map. **Exhibit H-2** is a statewide map that displays all 14 districts under the Illustrative Plan.

57. **Exhibit I-1** is a table reporting 2020 Census population statistics for the Illustrative Plan, as well as CVAP estimates from the Census Bureau’s 2016–2020 Special Tabulation.¹⁰

58. **Exhibit I-2** is a set of maps depicting the Illustrative Plan, zooming in on each of the 14 districts under the Illustrative Plan. Districts in the 2021 Plan that do not change are displayed with red line boundaries.

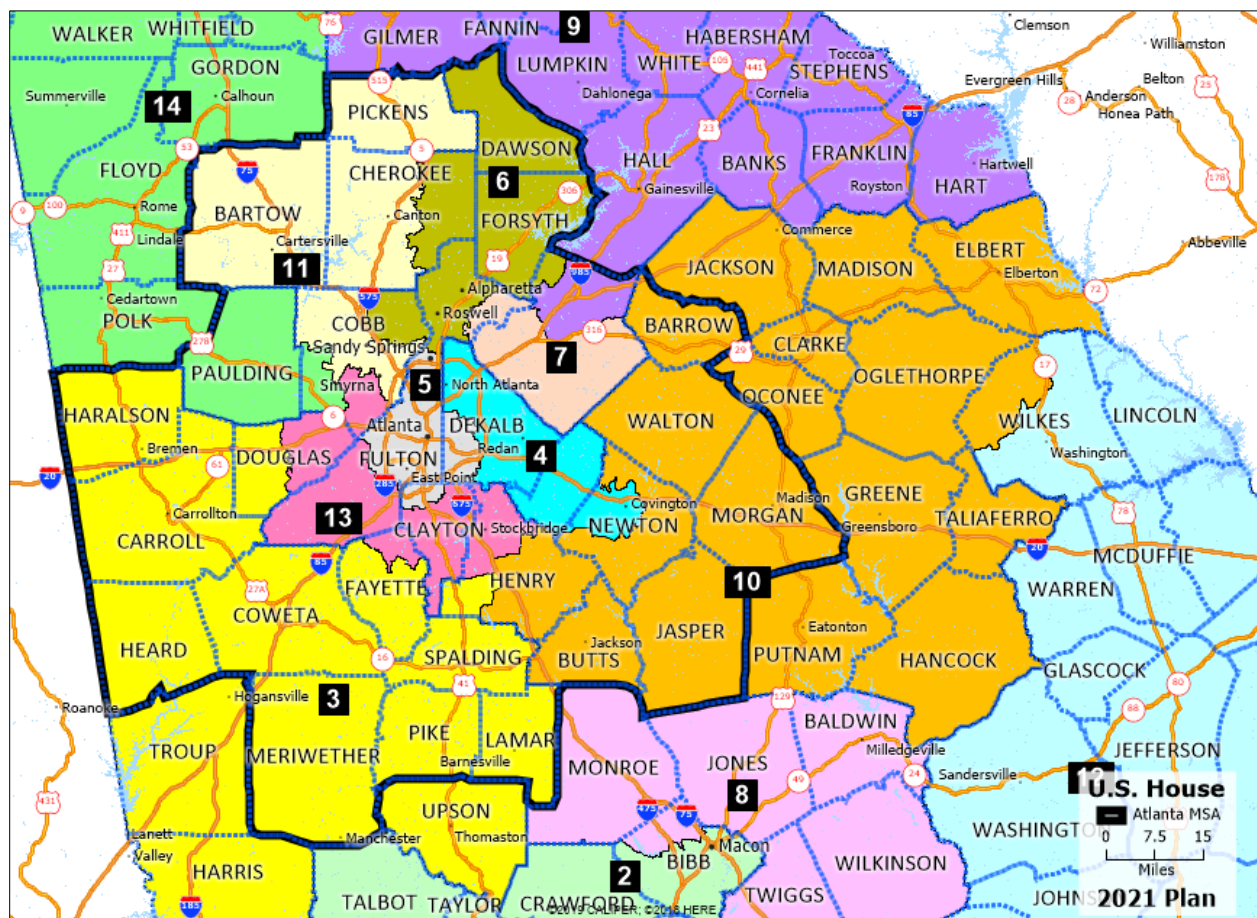
59. **Exhibit I-3** details district assignments by county population in the Illustrative Plan.

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¹⁰ In the summary population exhibits by plan that I have prepared, I also report the NH DOJ Black CVAP metric. The NH DOJ Black CVAP category includes voting age citizens who are either NH SR Black or NH Black and White. An “Any Part Black CVAP” category that would include Black Hispanics cannot be calculated from the 5-Year ACS Census Bureau Special Tabulation. The estimates are disaggregated from the block group level as published by the U.S. Census Bureau. The most current data available is from the 2016–2020 Special Tabulation, with a survey midpoint of July 1, 2018. Source: <https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>. The 2016–2020 estimates reflect 2020 Census population distribution. The 2017–2021 CVAP estimates will be released by the Census Bureau in early 2023.

60. For comparison, the map in **Figure 13** depicts Metro Atlanta and surrounding counties with an overlay of the 2021 Plan. The 2021 Plan splits majority-non-White Cobb County into parts of four districts: from south to north, CD 13, CD 14, CD 11, and CD 6. Southwest Cobb County is in CD 14, which stretches all the way to the suburbs of Chattanooga.

Figure 13
2021 Plan: Metro Atlanta



61. **Exhibit J-1** is a higher resolution of the **Figure 10** map. **Exhibit J-2** is a statewide map that displays all 14 districts under the 2021 Plan.

62. For comparison, **Exhibit K-1** is a table reporting 2020 Census population statistics for the 2021 Plan, as well as CVAP estimates from the Census Bureau’s 2016–2020 Special Tabulation.

63. **Exhibit K-2** is a set of maps depicting the 2021 Plan, zooming in on each of the 14 districts under the 2021 Plan.

64. **Exhibit K-3** details district assignments by county population in the 2021 Plan.

C. Communities of Interest

65. In the development of the Illustrative Plan, I prioritized keeping counties whole and minimizing unnecessary county splits. For example, as Illustrative CD 6 (which includes just three Cobb County splits) makes clear, there is no reason to split Cobb County into four pieces (i.e., four splits), as under the 2021 Plan.

66. I also endeavored to keep municipalities intact and avoid splitting VTDs (in that order of priority) wherever possible. In many instances there are geographic conflicts between municipality lines and VTD lines, such that keeping one geographic level whole might require splitting the other.

67. These three levels of geography—counties, municipalities, and VTDs—together with census tracts and census block groups are the best way to achieve a quantifiable measure of the extent to which a redistricting plan respects communities of interest.

68. Going beyond these quantifiable measures of communities of interest, it simply makes more sense to anchor Illustrative CD 6 in the western part of Metro Atlanta. As the Illustrative Plan demonstrates, CD 6 can be drawn in a compact fashion that keeps Atlanta-area urban/suburban/exurban voters together. In sharp contrast, the 2021 Plan—its treatment of Cobb County in particular—inexplicably mixes Appalachian North Georgia with urban/suburban Metro Atlanta. In some redistricting plans, it might be necessary to mix urban and rural voters in a sprawling congressional district. But that is not the case here: Cobb County can be combined in a congressional district with all or part of Douglas, Fulton, and Fayette Counties, all of which are core Metro Atlanta counties under the Atlanta Regional Commission map. Illustrative CD 6 thus unites Georgians in the Metro Atlanta area with shared interests and concerns.

69. In Cobb County, the Illustrative Plan assigns all but noncontiguous zero-population areas of Marietta to CD 6. Kennesaw (population 33,036) is split between CD 6 and CD 11.¹¹ (See **Exhibit M-3**.) By contrast, the 2021 Plan divides populated areas of Marietta (population 60,972) between CD 6 and CD 11 and also divides

¹¹ I placed the east end of Kennesaw in Illustrative CD 6—namely, two whole VTDs (Big Shanty 01 and Kennesaw 1A) and part of another (Kennesaw 3A). Big Shanty 01 contains a group of noncontiguous populated blocks surrounded by the oddly shaped Kennesaw 3A; I split Kennesaw 3A following two census-defined block group boundaries.

populated areas of Smyrna (population 55,663) between CD 11 and CD 13. (See **Exhibit M-4**.)

70. Douglas County is entirely in CD 6 in the Illustrative Plan. The 2021 Plan divides Douglas County between CD 6 and CD 11, splitting Douglasville (population 34,650). (See **Exhibit M-4**.)

71. In Fulton County, the Illustrative Plan and the 2021 Plan follow the boundary of CD 5, which is identical in both plans.

72. Illustrative CD 6 extends into Fayette County to ensure that CD 13 is not overpopulated. In order to meet zero-deviation requirements, the dividing line between Illustrative CD 6 and Illustrative CD 13 generally follows the municipal boundary of Tyrone (population 7,658). (See **Exhibit M-3**.) By contrast, in Fayette County, the 2021 Plan divides populated areas of Fayetteville (population 18,957) between CD 13 and CD 3. (See **Exhibit M-4**.)

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D. BVAP and BCVAP by District

73. Notably, the Illustrative Plan does not reduce the number of preexisting majority-Black districts in the 2021 Plan. For reference, **Figure 14** compares BVAP and BCVAP under the Illustrative Plan and the 2021 Plan. The eight districts that change are identified with a bolded font.

Figure 14
BVAP and BCVAP Comparison: Illustrative Plan and 2021 Plan

District*	Illustrative Plan				2021 Plan		
	% BVAP	% NH BCVAP	% NH DOJ BCVAP		% BVAP	% NH BCVAP	% NH DOJ BCVAP
1	28.17%	29.16%	29.67%		28.17%	29.16%	29.67%
2	49.29%	49.55%	50.001%		49.29%	49.55%	50.001%
3	20.47%	19.64%	20.02%		23.32%	22.53%	22.86%
4	52.77%	55.62%	56.37%		54.52%	57.71%	58.46%
5	49.60%	51.64%	52.35%		49.60%	51.64%	52.35%
6	50.23%	50.18%	50.98%		9.91%	9.72%	10.26%
7	29.82%	31.88%	32.44%		29.82%	31.88%	32.44%
8	30.04%	30.46%	30.76%		30.04%	30.46%	30.76%
9	11.66%	11.29%	11.74%		10.42%	10.03%	10.34%
10	14.31%	15.09%	15.39%		22.60%	22.11%	22.56%
11	13.67%	12.91%	13.48%		17.95%	17.57%	18.30%
12	36.72%	36.60%	37.19%		36.72%	36.60%	37.19%
13	51.13%	49.64%	50.34%		66.75%	66.36%	67.05%
14	5.17%	4.80%	5.19%		14.28%	13.19%	13.71%

*Bold font identifies districts that are changed from the 2021 Plan configuration.

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E. VAP by Race in Majority-Black and Majority-White Districts

74. As shown in **Figure 15**, only about half (49.96%) of Black voters in Georgia reside in a majority-Black congressional district under the 2021 Plan. Under the Illustrative Plan, 57.48% of the Black VAP would reside in a majority-Black district—still far lower than the corresponding 75.50% NH White VAP residing in majority-White districts.

Figure 15
Same-Race VAP in Majority-Black and Majority-White Districts: 2021 Plan and Illustrative Plan

Redistricting Plan	% Black VAP in Majority-Black Districts	%NH White VAP in Majority-White Districts	Difference (% Black VAP minus % NH White VAP)
2021 Plan	49.96%	82.47%	-32.51%
Illustrative Plan	57.48%	75.50%	-18.01%

F. Online Interactive Map

75. The Illustrative Plan can be viewed in detail and analyzed on the Dave's Redistricting website at the following link: <https://davesredistricting.org/join/acc0684b-36b9-4b85-8049-ffb67a63aa57>.

76. For comparison, the 2021 Plan can also be viewed and analyzed on the Dave's Redistricting website at the following link: <https://davesredistricting.org/join/385b8d71-ecdb-4767-80d9-ebd75b8d8c63>.

77. Alternatively, the Illustrative Plan can be viewed with a red-line overlay of the 2021 Plan on the Maptitude Online website at the following link: <https://online.caliper.com/mas-874-drp-290-ujr/maps/lahchqqg000g8gqi3qx9>.

G. Supplemental Plan Information and Comparisons

78. Compactness scores for the Illustrative Plan are about the same as the 2021 Plan—and within the norm in Georgia and elsewhere.¹² **Exhibit L-1** contains compactness scores generated by Maptitude for the Illustrative Plan. Corresponding scores for the 2012 Benchmark Plan and 2021 Plan are in **Exhibit L-2** and **Exhibit L-3**.

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¹² See, for example, the comparison of compactness scores across all states by the geospatial firm Azavea in their white paper titled *Redrawing the Map on Redistricting: 2012 Addendum*, available at: https://redistricting.azavea.com/assets/pdfs/Azavea_Redistricting-White-Paper-Addendum-2012_sm.pdf.

79. **Figure 13** (condensed from the Exhibit L series) is a summary, reporting the mean averages and low scores for the Reock¹³ and Polsby-Popper¹⁴ metrics under both the Illustrative Plan and the 2021 Plan.

Figure 13
Compactness Comparison: Illustrative Plan, 2012 Benchmark, and 2021 Plan

	Reock		Polsby-Popper	
	Mean	Low	Mean	Low
Illustrative Plan	.43	.28	.27	.18
2012 Benchmark	.45	.33	.26	.16
2021 Plan	.44	.31	.27	.16

80. **Exhibit M-1** contains a county and VTD split report generated by Maptitude for the Illustrative Plan. **Exhibit M-2** and **Exhibit M-3** are corresponding split reports for the 2012 Benchmark Plan and the 2021 Plan. **Exhibit M-4** contains the Illustrative Plan’s municipal split report for the 531 incorporated cities and towns. **Exhibit M-5** and **Exhibit M-6** are corresponding split reports for the 2012 Benchmark Plan and the 2021 Plan.

¹³ As the Maptitude for Redistricting software documentation (authored by the Caliper Corporation) explains, “[t]he Reock test is an area-based measure that compares each district to a circle, which is considered to be the most compact shape possible. For each district, the Reock test computes the ratio of the area of the district to the area of the minimum enclosing circle for the district. The measure is always between 0 and 1, with 1 being the most compact. The Reock test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.”

¹⁴ As the Maptitude for Redistricting software documentation (authored by the Caliper Corporation) explains, “[t]he Polsby-Popper test computes the ratio of the district area to the area of a circle with the same perimeter: $4\pi\text{Area}/(\text{Perimeter}^2)$. The measure is always between 0 and 1, with 1 being the most compact. The Polsby-Popper test computes one number for each district and the minimum, maximum, mean and standard deviation for the plan.”

81. **Figure 14** summarizes county, 2020 VTD, and municipal splits under the Illustrative Plan, the 2012 Benchmark Plan, and the 2021 Plan.

Figure 14
County, VTD, and Municipal Splits: Illustrative Plan, 2012 Benchmark, and 2021 Plan (All Districts)

	Split Counties*	County Splits*	2020 VTD Splits*	Split Cities/ Towns[#]	City/ Town Splits*
Illustrative Plan	15	18	43	37	78
2012 Benchmark Plan	16	22	43	40	85
2021 Plan	15	21	46	43	91

*Excludes unpopulated areas

[#]Out of 531 municipalities (calculated by subtracting the number of whole cities in the Maptitude report from 531)

82. The Illustrative Plan and 2021 Plan both split 15 counties. But, as Figure 14 reveals, the Illustrative Plan is superior across the other four categories: **(1)** total county splits (counting multiple splits, i.e., unique county-district combinations in a single county)—18 vs. 21 splits; **(2)** 2020 VTD splits (counting multiple splits and excluding unpopulated areas)—43 vs. 46 splits, **(3)** split municipalities (out of 531)—37 vs. 43 splits; and **(4)** total municipal splits (excluding unpopulated areas)—78 vs. 91 splits.

H. County and Municipal Socioeconomic Characteristics

83. For background on socioeconomic characteristics by race and ethnicity at the state, MSA, county, municipal, and unincorporated-community levels in

Georgia, I have prepared charts based on the 5-Year 2015–2019 ACS. That data is available online.¹⁵

84. In addition, I have prepared charts and reproduced the U.S. Census Bureau’s Table S0201¹⁶ statistical summaries of socioeconomic characteristics from the 1-Year 2021 ACS for Georgia, the two most populous MSAs in the state (Atlanta and Augusta-Richmond County), and the four most populous counties of the Atlanta MSA (Cobb, Dekalb, Fulton, and Gwinnett). Statistics for other, less populous counties are not available in the S0201 series.

85. These charts and data tables document that socioeconomic disparities by race exist at the county and municipal levels throughout Georgia. In an almost unbroken fashion, NH Whites maintain higher levels of socioeconomic well-being.

V. CONCLUSION

86. The Black population in Metro Atlanta is sufficiently numerous and geographically compact to allow for the creation of an additional majority-Black congressional district consistent with traditional redistricting principles, anchored in

¹⁵ The county-level data is available at http://www.fairdata2000.com/ACS_2015_19/Georgia; the community-level data is available at http://www.fairdata2000.com/ACS_2015_19/Georgia/00_Places_2500+; and the state-, metro counties-, and MSA-level data is available at http://www.fairdata2000.com/ACS_2021/Georgia.

¹⁶ The full S0201 data is available at https://data.census.gov/cedsci/table?text=s0201&t=001%3A005%3A451&g=0400000US13,13%240500000_0500000US13067,13089,13121,13135_310XX00US12060,12260&y=2021.

Cobb, Fulton and Douglas Counties, without reducing the number of majority-Black districts in the 2021 Plan.

87. The Illustrative Plan creates an additional majority-Black district in Metro Atlanta, where the Black population has increased by 938,006 persons since 2000—accounting for 75.1% of the statewide Black population increase this century—and where, according to the Governor’s Office of Planning and Budget, the Black population will continue to increase over the course of this decade.¹⁷

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¹⁷ Source: <https://opb.georgia.gov/census-data/population-projections>.

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: December 5, 2022

A handwritten signature in black ink that reads "Bill Cooper". The signature is written in a cursive, slightly slanted style.

WILLIAM S. COOPER

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT A

November 30, 2022

William S. Cooper
P.O. Box 16066
Bristol, VA 24209
276-669-8567
bcooper@msn.com

Summary of Redistricting Work

I have a B.A. in Economics from Davidson College in Davidson, North Carolina.

Since 1986, I have prepared proposed redistricting maps of approximately 750 jurisdictions for Section 2 litigation, Section 5 comment letters, and for use in other efforts to promote compliance with the Voting Rights Act of 1965. I have analyzed and prepared election plans in over 100 of these jurisdictions for two or more of the decennial censuses – either as part of concurrent legislative reapportionments or, retrospectively, in relation to litigation involving many of the cases listed below.

From 1986 to 2022, I have prepared election plans for Section 2 litigation in Alabama, Connecticut, Florida, Georgia, Louisiana, Maryland, Mississippi, Missouri, Montana, Nebraska, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, Washington, and Wyoming.

Post-2020 Redistricting Experience

Since the release of the 2020 Census, three county commission-level plans I developed as a private consultant have been adopted by local governments in San Juan County, Utah, Bolivar County, Miss., and Washington County, Miss. In addition, a school board plan I developed was adopted by the Jefferson County, Alabama Board of Education (*Stout v. Jefferson County*).

In 2022, I have testified at trial in seven Sec. 2 lawsuits: Alabama (Congress), Arkansas (Supreme and Appellate Courts), Florida (voter suppression), Georgia (State

November 30, 2022

House, State Senate, and Congress), Louisiana (Congress) and Maryland (Baltimore County Commission).

2010s Redistricting Experience

I developed statewide legislative plans on behalf of clients in nine states (Alabama, Connecticut, Florida, Georgia, Kentucky, Mississippi, South Carolina, Texas, and Virginia), as well as over 150 local redistricting plans in approximately 30 states – primarily for groups working to protect minority voting rights. In addition, I have prepared congressional plans for clients in eight states (Alabama, Florida, Georgia, Louisiana, Maryland, Ohio, Pennsylvania, South Carolina, and Virginia).

In March 2011, I was retained by the Sussex County, Virginia Board of Supervisors and the Bolivar County, Mississippi Board of Supervisors to draft new district plans based on the 2010 Census. In the summer of 2011, both counties received Section 5 preclearance from the U.S. Department of Justice (DOJ).

Also in 2011, I was retained by way of a subcontract with Olmedillo X5 LLC to assist with redistricting for the Miami-Dade County, Florida Board of Commissioners and the Miami-Dade, Florida School Board. Final plans were adopted in late 2011 following public hearings.

In the fall of 2011, I was retained by the City of Grenada, Mississippi to provide redistricting services. The ward plan I developed received DOJ preclearance in March 2012.

In 2012 and 2013, I served as a redistricting consultant to the Tunica County, Mississippi Board of Supervisors and the Claiborne County, Mississippi Board of Supervisors.

In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Voting Rights Act Section 2 violation, a seven single-member district plan

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that I developed for the Latino plaintiffs. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In *Pope v. Albany County* (N.D.N.Y. Mar. 24, 2015), the court approved, as a remedy for a Section 2 violation, a plan drawn by the defendants, creating a new Black-majority district. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In 2016, two redistricting plans that I developed on behalf of the plaintiffs for consent decrees in Section 2 lawsuits in Georgia were adopted (*NAACP v. Fayette County, Georgia* and *NAACP v. Emanuel County, Georgia*).

In 2016, two federal courts granted summary judgment to the plaintiffs based in part on my *Gingles 1* testimony: *Navajo Nation v. San Juan County, Utah* (C.D. Utah 2016) and *NAACP v. Ferguson-Florissant School District, Missouri* (E. D. Mo. August 22, 2016).

Also in 2016, based in part on my analysis, the City of Pasco, Washington admitted to a Section 2 violation. As a result, in *Glatt v. City of Pasco* (E.D. Wash. Jan. 27, 2017), the court ordered a plan that created three Latino majority single-member districts in a 6 district, 1 at-large plan.

In 2018, I served as the redistricting consultant to the Governor Wolf interveners at the remedial stage of *League of Women Voters, et al. v. Commonwealth of Pennsylvania*.

In August 2018, the Wenatchee City Council adopted a hybrid election plan that I developed – five single-member districts with two members at-large. The Wenatchee election plan is the first plan adopted under the Washington Voting Rights Acts of 2018.

In February 2019, a federal court ruled in favor of the plaintiffs in a Section 2 case regarding Senate District 22 in Mississippi, based in part on my *Gingles 1* testimony in *Thomas v. Bryant* (S.D. Ms. Feb 16, 2019).

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In the summer of 2019, I developed redistricting plans for the Grand County (Utah) Change of Form of Government Study Committee.

In the fall of 2019, a redistricting plan I developed for a consent decree involving the Jefferson County, Alabama Board of Education was adopted *Traci Jones, et al. v. Jefferson County Board of Education, et al.*

In May 2020, a federal court ruled in favor of the plaintiffs in a Section 2 case in *NAACP et al. v. East Ramapo Central School District, NY*, based in part on my *Gingles* 1 testimony. In October 2020, the federal court adopted a consent decree plan I developed for elections to be held in February 2021.

In May and June of 2020, I served as a consultant to the City of Quincy, Florida – the Defendant in a Section 2 lawsuit filed by two Anglo voters (*Baroody v. City of Quincy*). The federal court for the Northern District of Florida ruled in favor of the Defendants. The Plaintiffs voluntarily dismissed the case.

In the summer of 2020, I provided technical redistricting assistance to the City of Chestertown, Maryland.

I am currently a redistricting consultant and expert for the plaintiffs in *Jayla Allen v. Waller County, Texas*. I testified remotely at trial in October 2020.

Since 2011, I have served as a redistricting and demographic consultant to the Massachusetts-based Prison Policy Initiative for a nationwide project to end prison-based gerrymandering. I have analyzed proposed and adopted election plans in about 25 states as part of my work.

In 2018 (Utah) and again in 2020 (Arizona), I have provided technical assistance to the Rural Utah Project for voter registration efforts on the Navajo Nation Reservation.

Post-2010 Demographics Experience

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My trial testimony in Section 2 lawsuits usually includes presentations of U.S. Census data with charts, tables, and/or maps to demonstrate socioeconomic disparities between non-Hispanic Whites and racial or ethnic minorities.

I served as a demographic expert for plaintiffs in four state-level voting cases related to the Covid-19 pandemic (South Carolina, Alabama, and Louisiana) and state court in North Carolina.

I have also served as an expert witness on demographics in non-voting trials. For example, in an April 2017 opinion in *Stout v. Jefferson County Board of Education* (Case no.2:65-cv-00396-MHH), a school desegregation case involving the City of Gardendale, Ala., the court made extensive reference to my testimony.

I provide technical demographic and mapping assistance to the Food Research and Action Center (FRAC) in Washington D.C and their constituent organizations around the country. Most of my work with FRAC involves the Summer Food Program and Child and Adult Care Food Program. Both programs provide nutritional assistance to school-age children who are eligible for free and reduced price meals. As part of this project, I developed an online interactive map to determine site eligibility for the two programs that has been in continuous use by community organizations and school districts around the country since 2003. The map is updated annually with new data from a Special Tabulation of the American Community Survey prepared by the U.S. Census Bureau for the Food and Nutrition Service of the U.S. Department of Agriculture.

Historical Redistricting Experience

In the 1980s and 1990s, I developed voting plans in about 400 state and local jurisdictions – primarily in the South and Rocky Mountain West. During the 2000s and

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2010s, I prepared draft election plans involving about 350 state and local jurisdictions in 25 states. Most of these plans were prepared at the request of local citizens' groups, national organizations such as the NAACP, tribal governments, and for Section 2 or Section 5 litigation.

Election plans I developed for governments in two counties – Sussex County, Virginia and Webster County, Mississippi – were adopted and precleared in 2002 by the U.S. Department of Justice. A ward plan I prepared for the City of Grenada, Mississippi was precleared in August 2005. A county supervisors' plan I produced for Bolivar County, Mississippi was precleared in January 2006.

In August 2005, a federal court ordered the State of South Dakota to remedy a Section 2 voting rights violation and adopt a state legislative plan I developed (*Bone Shirt v. Hazeltine*).

A county council plan I developed for Native American plaintiffs in a Section 2 lawsuit (*Blackmoon v. Charles Mix County*) was adopted by Charles Mix County, South Dakota in November 2005. A plan I drafted for Latino plaintiffs in Bethlehem, Pennsylvania (*Pennsylvania Statewide Latino Coalition v. Bethlehem Area School District*) was adopted in March 2009. Plans I developed for minority plaintiffs in Columbus County, North Carolina and Montezuma- Cortez School District in Colorado were adopted in 2009.

Since 1986, I have testified at trial as an expert witness on redistricting and demographics in federal courts in the following voting rights cases (approximate most recent testimony dates are in parentheses). I also filed declarations and was deposed in most of these cases.

Alabama*Caster v. Merrill* (2022)*Chestnut v. Merrill* (2019)

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Alabama State Conference of the NAACP v. Alabama (2018)
Alabama Legislative Black Caucus et al. v. Alabama et al. (2013)

Arkansas

The Christian Ministerial Alliance v. Hutchinson (2022)

Colorado

Cuthair v. Montezuma-Cortez School Board (1997)

Florida

NAACP v. Lee (2022)

Baroody v. City of Quincy (2020)

Georgia

Pendergrass v. Raffensperger (2022)

Alpha Phi Alpha v. Raffensperger (2022)

Cofield v. City of LaGrange (1996)

Love v. Deal (1995)

Askew v. City of Rome (1995)

Woodard v. Lumber City (1989)

Louisiana

Galmon v. Ardoin (2022)

Terrebonne Parish NAACP v. Jindal, et al. (2017)

Wilson v. Town of St. Francisville (1996)

Reno v. Bossier Parish (1995)

Knight v. McKeithen (1994)

Maryland

NAACP v. Baltimore County (2022)

Cane v. Worcester County (1994)

Mississippi

Thomas v. Bryant (2019)

Fairley v. Hattiesburg (2014)

Boddie v. Cleveland School District (2010)

Fairley v. Hattiesburg (2008)

Boddie v. Cleveland (2003)

Jamison v. City of Tupelo (2006)

Smith v. Clark (2002)

NAACP v. Fordice (1999)

Addy v Newton County (1995)

Ewing v. Monroe County (1995)

Gunn v. Chickasaw County (1995)

Nichols v. Okolona (1995)

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Montana

Old Person v. Brown (on remand) (2001)

Old Person v. Cooney (1998)

Missouri

Missouri NAACP v. Ferguson-Florissant School District (2016)

Nebraska

Stabler v. Thurston County (1995)

New York

NAACP v. East Ramapo Central School District (2020)

Pope v. County of Albany (2015)

Arbor Hills Concerned Citizens v. Albany County (2003)

Ohio

A. Philip Randolph Institute, et al. v. Ryan (2019)

South Carolina

Smith v. Beasley (1996)

South Dakota

Bone Shirt v. Hazeltine (2004)

Cottier v. City of Martin (2004)

Tennessee

Cousins v. McWherter (1994)

Rural West Tennessee African American Affairs Council v. McWherter (1993)

Texas

Jayla Allen v. Waller County, Texas

Utah

Navajo Nation v. San Juan County (2017), brief testimony –11 declarations, 2 depositions

Virginia

Smith v. Brunswick County (1991)

Henderson v. Richmond County (1988)

McDaniel v. Mehfoud (1988)

White v. Daniel (1989)

Wyoming

Large v. Fremont County (2007)

In addition, I have filed expert declarations or been deposed in the following cases that did not require trial testimony. The dates listed indicate the deposition date or

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date of last declaration or supplemental declaration:

Alabama

People First of Alabama v. Merrill (2020), Covid-19 demographics only
Alabama State NAACP v. City of Pleasant Grove (2019)
James v. Jefferson County Board of Education (2019)
Voketz v. City of Decatur (2018)

Arkansas

Mays v. Thurston (2020)-- Covid-19 demographics only)

Connecticut

NAACP v. Merrill (2020)

Florida

Florida State Conference of the NAACP v. Lee, et al., (2021)
Calvin v. Jefferson County (2016)
Thompson v. Glades County (2001)
Johnson v. DeSoto County (1999)
Burton v. City of Belle Glade (1997)

Georgia

Dwight v. Kemp (2018)
Georgia NAACP et al. v. Gwinnett County, GA (2018)
Georgia State Conference NAACP et al v. Georgia (2018)
Georgia State Conference NAACP, et al. v. Fayette County (2015)
Knighton v. Dougherty County (2002)
Johnson v. Miller (1998)
Jones v. Cook County (1993)

Kentucky

Herbert v. Kentucky State Board of Elections (2013)

Louisiana

Power Coalition for Equity and Justice v. Edwards (2020), Covid-19 demographics only
Johnson v. Ardoin (2019)
NAACP v. St. Landry Parish Council (2005)
Prejean v. Foster (1998)
Rodney v. McKeithen (1993)

Maryland

Baltimore County NAACP v. Baltimore County (2022)
Benisek v. Lamone (2017)
Fletcher v. Lamone (2011)

Mississippi

Partee v. Coahoma County (2015)

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Figgs v. Quitman County (2015)
West v. Natchez (2015)
Williams v. Bolivar County (2005)
Houston v. Lafayette County (2002)
Clark v. Calhoun County (on remand)(1993)
Teague v. Attala County (on remand)(1993)
Wilson v. Clarksdale (1992)
Stanfield v. Lee County(1991)

Montana

Alden v. Rosebud County (2000)

North Carolina

Lewis v. Alamance County (1991)
Gause v. Brunswick County (1992)
Webster v. Person County (1992)

Rhode Island

Davidson v. City of Cranston (2015)

South Carolina

Thomas v. Andino (2020), Covid-19 demographics only
Vander Linden v. Campbell (1996)

South Dakota

Kirkie v. Buffalo County (2004)
Emery v. Hunt (1999)

Tennessee

NAACP v. Frost, et al. (2003)

Virginia

Moon v. Beyer (1990)

Washington

Glatt v. City of Pasco (2016)
Montes v. City of Yakima (2014)

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DECLARATION OF WILLIAM S. COOPER:
EXHIBIT B

Exhibit B – Methodology and Sources

1. In the preparation of this report, I analyzed population and geographic data from the Decennial Census and the American Community Survey.

2. For my redistricting analysis, I used a geographic information system (GIS) software package called *Maptitude for Redistricting*, developed by the Caliper Corporation. This software is deployed by many local and state governing bodies across the country for redistricting and other types of demographic analysis.

3. The geographic boundary files that I used with *Maptitude* are created from the U.S. Census 1990-2020 TIGER (Topologically Integrated Geographic Encoding and Referencing) files.

4. I used population data from the 1990-2020 PL 94-171 data files published by the U.S. Census Bureau. The PL 94-171 dataset is published in electronic format and is the complete count population file designed by the Census Bureau for use in legislative redistricting. The file contains basic race and ethnicity data on the total population and voting-age population found in units of Census geography such as states, counties, municipalities, townships, reservations, school districts, census tracts, census block groups, precincts (called voting districts or “VTDs” by the Census Bureau) and census blocks.

5. I obtained and used 2020 block-level disaggregated citizenship data (2015-2019 ACS and 2016-2020 ACS) from the Redistricting Data Hub via <https://redistrictingdatahub.org/>

6. The attorneys for the plaintiffs provided me with incumbent addresses.

7. For my analysis, I also relied on shapefiles for current and historical legislative plans available on the website of the Legislative and Congressional Reapportionment Office.

8. In addition, I obtained shapefiles for the House, Senate, and Congressional plans in effect during the early 2000's from the American Redistricting Project.

<https://thearp.org/blog/map-archive/>

9. I developed the illustrative plans presented in this report using *Maptitude for Redistricting*. The *Maptitude for Redistricting* software processes the TIGER files to produce a map for display on a computer screen. The software also merges demographic data from the PL 94-171 files to match the relevant decennial Census geography.

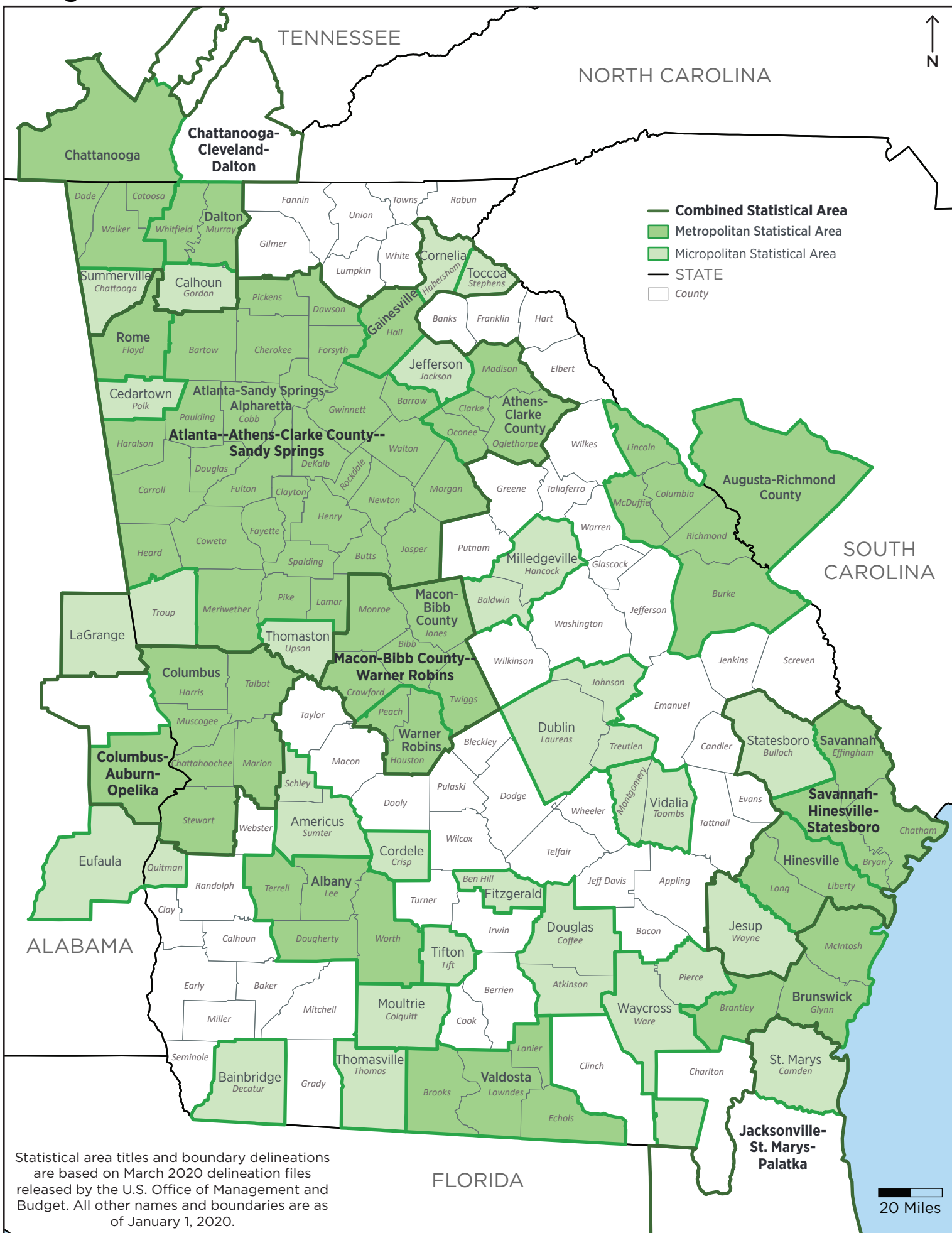
10. I also reviewed and used data from the American Community Survey ("ACS") conducted by the Census Bureau – specifically, the 1-year 2021 ACS, the 5-year 2015-2019 ACS, and the 5-year 2016-2020 ACS Special Tabulation of citizen population and voting age population by race and ethnicity (prepared by the

Census Bureau for the U.S. Department of Justice) and available from the link below:

<https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html>

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DECLARATION OF WILLIAM S. COOPER:
EXHIBIT C



DECLARATION OF WILLIAM S. COOPER:
EXHIBIT D

Metro Atlanta Black Population Change 2010-2020 by County

Illustrative District 6 Counties with Highlight

2010 -2020 Change

County (Metro Atlanta in Bold)	2020 Pop	AP Black	Latino	NH White	18+ Pop	18+ AP Black	18+ Latino	NH18+ White	Black Pop		Black		% Black
									Pop Change	Change	18+ Pop Change	18+Pop change	18+Pop change
BARROW	83505	11907	10560	55582	62195	8222	6726	43241	14138	3287	12417	2553	45.0%
BARTOW	108901	13395	10751	80159	83570	9377	6817	63759	8744	2365	10213	2083	28.6%
BUTTS	25434	7212	803	16628	20360	5660	559	13510	1779	595	2030	564	11.1%
CARROLL	119148	24618	9586	80725	90996	17827	6129	63803	8621	3049	8593	2916	19.6%
CHEROKEE	266620	21687	32111	197867	202928	14976	20915	156155	52274	7817	47502	6222	71.1%
CLAYTON	297595	216351	42546	25902	220578	158854	27378	23396	38171	40374	36133	37475	30.9%
COBB	766149	223116	111240	369182	591848	166141	74505	303300	78071	42151	80257	41430	33.2%
COWETA	146158	28289	11053	99421	111155	20196	7384	78073	18841	5130	18670	4501	28.7%
DAWSON	26798	392	1605	23544	21441	249	1047	19183	4468	203	4194	146	141.7%
DEKALB	764382	407451	81471	215895	595276	314230	55506	180161	72489	22898	68519	34330	12.3%
DOUGLAS	144237	74260	16035	49877	108428	53377	10212	41416	11834	20007	13558	17860	50.3%
FAYETTE	119194	32076	9480	68144	91798	23728	6168	55102	12627	9578	13330	8373	54.5%
FORSYTH	251283	13222	25226	159407	181193	8751	16204	122017	75772	7917	59087	5460	165.9%
FULTON	1066710	477624	86302	404793	847182	368635	61914	340541	146129	60732	146287	62029	20.2%
GWINNETT	957062	287687	220460	310583	709484	202762	146659	252041	151741	86155	138870	71745	54.8%
HARALSON	29919	1541	497	26825	22854	1106	323	20617	1139	13	1307	44	4.1%
HEARD	11412	1142	253	9589	8698	832	153	7407	-422	-101	-88	-60	-6.7%
HENRY	240712	125211	18437	86297	179973	89657	12030	69744	36790	46914	35708	38225	74.3%
JASPER	14588	2676	684	10771	11118	1966	402	8400	688	-466	693	-306	-13.5%
LAMAR	18500	5220	475	12344	14541	4017	323	9852	183	-611	93	-577	-12.6%
MERIWETHER	20613	7547	475	12084	16526	5845	299	9994	-1379	-1204	-256	-393	-6.3%
MORGAN	20097	4339	712	14487	15574	3280	434	11452	2229	20	2145	160	5.1%
NEWTON	112483	55901	7164	46746	84748	40433	4561	37631	12525	13634	13663	12748	46.0%
PAULDING	168661	41296	12564	108444	123998	28164	7974	83066	26337	15231	24768	11767	71.8%
PICKENS	33216	512	1198	30122	26799	319	755	24626	3785	124	4005	81	34.0%
PIKE	18889	1613	348	16313	14337	1254	207	12422	1020	-333	1306	-210	-14.3%
ROCKDALE	93570	57204	9540	24500	71503	41935	6089	21457	8355	16468	9202	14643	53.7%
SPALDING	67306	24522	3666	37105	52123	17511	2377	30612	3233	2894	4261	2752	18.6%
WALTON	96673	18804	5228	68499	73098	13165	3236	53647	12905	5086	11918	4068	44.7%
29-County MSA	6,089,815	2,186,815	730,470	2,661,835	4,654,322	1,622,469	487,286	2,156,625	803,087	409,927	768,385	380,629	30.7%

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT E



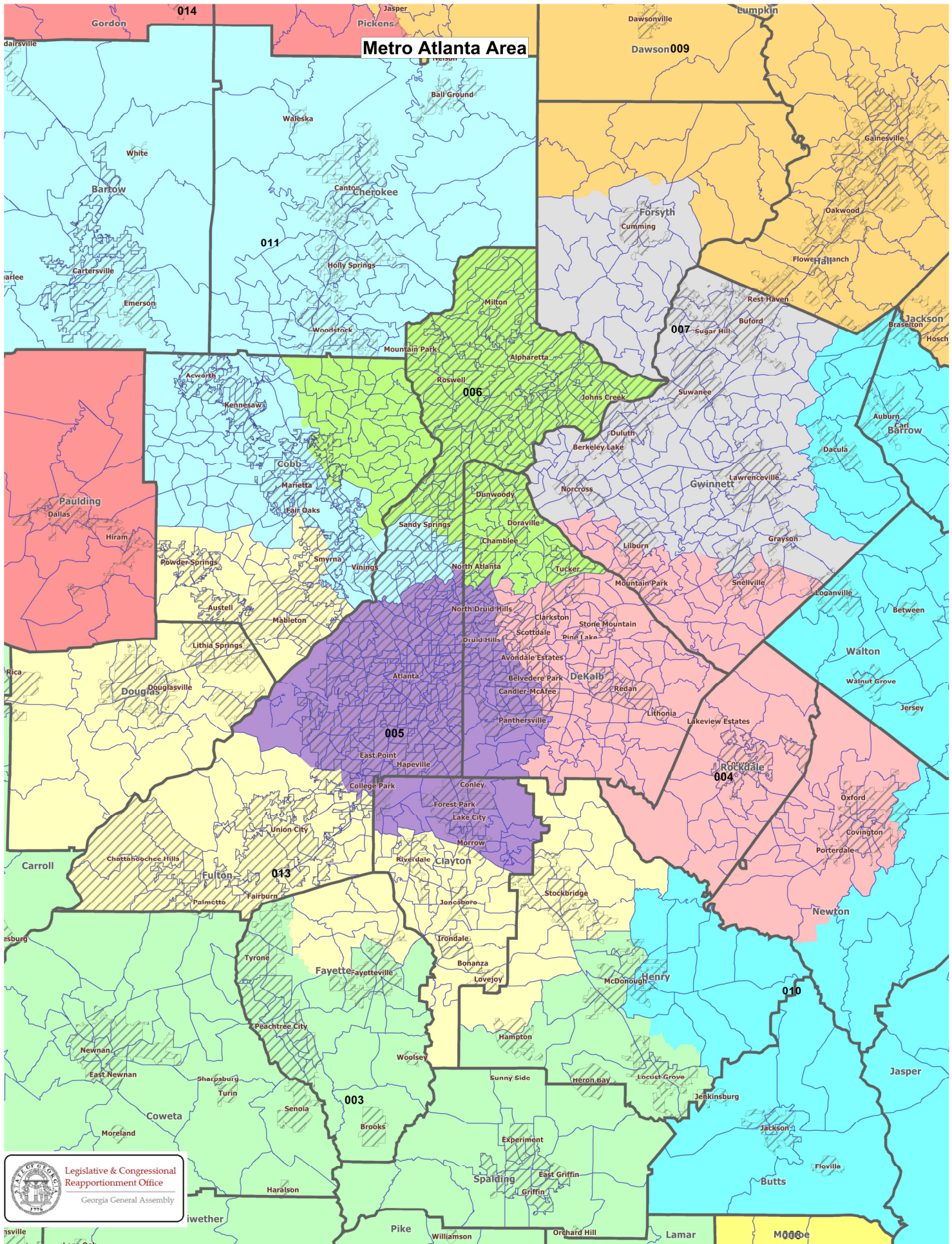
Georgia General Assembly

Districts

 County

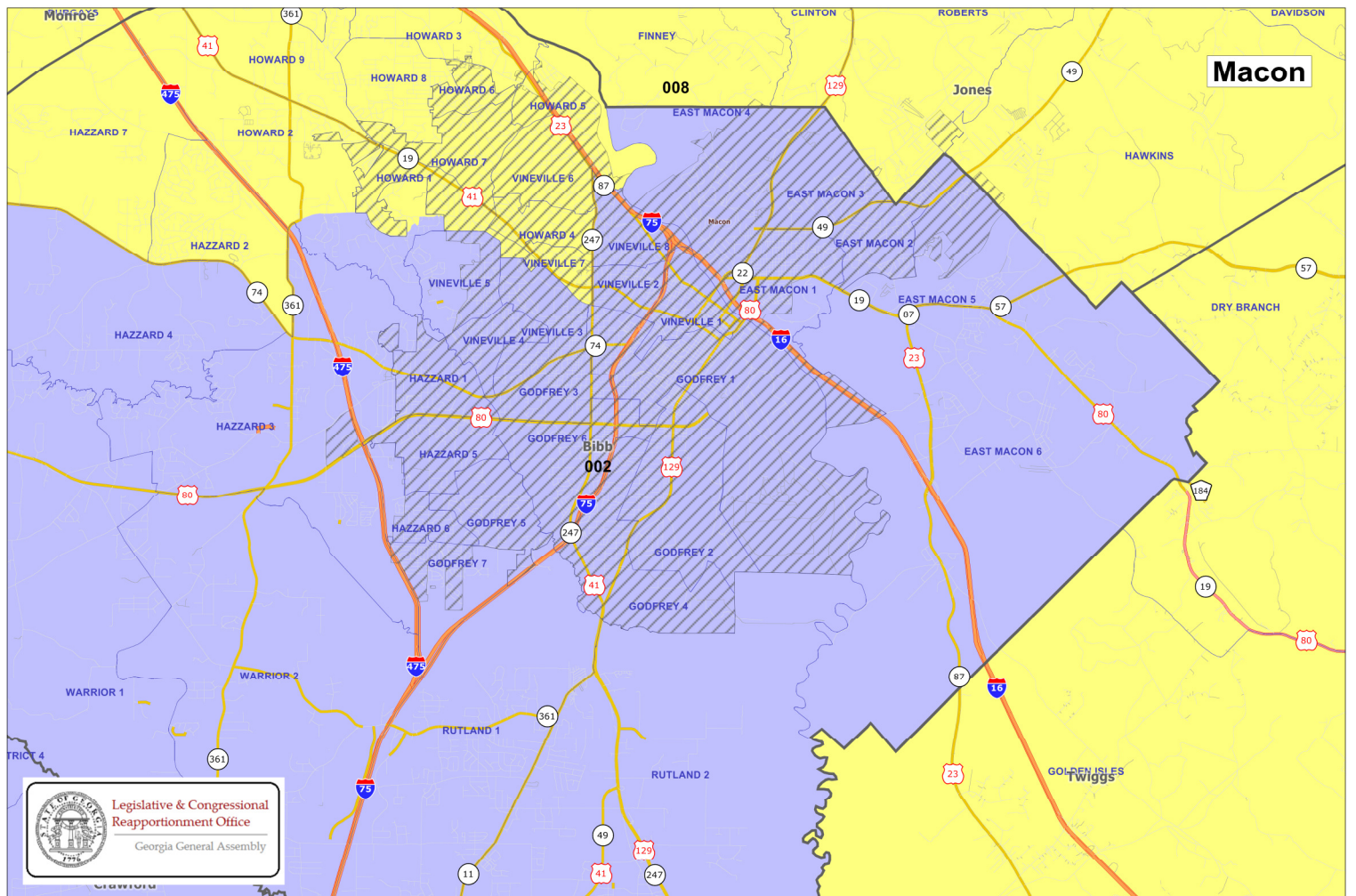
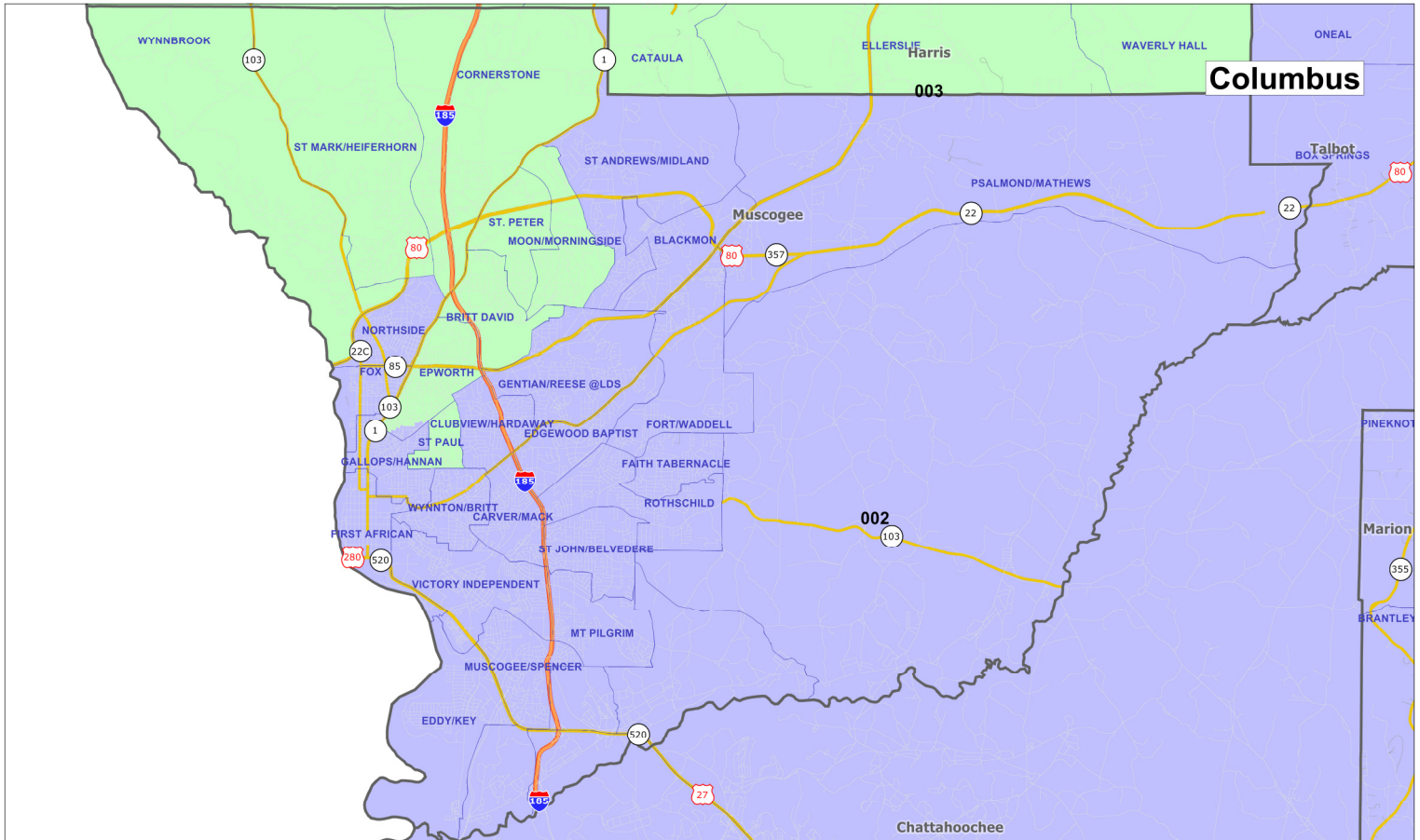
Georgia Congressional Districts

Client: State
Plan: Congress12
Type: Congress



Legislative & Congressional
Reapportionment Office
Georgia General Assembly

Georgia Congressional Districts



Plan Name: **Congress12**Plan Type : **Congress**User: **staff**Administrator: **State**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
001	691,974	-1	0.00%	207,711	30.02%	8,443	216,154	31.24%	39,767	5.75%
VAP	518,743			147,082	28.35%	3,105	150,187	28.95%	25,656	4.95%
002	691,976	1	0.00%	354,925	51.29%	6,835	361,760	52.28%	31,577	4.56%
VAP	516,392			252,570	48.91%	2,847	255,417	49.46%	20,824	4.03%
003	691,974	-1	0.00%	159,578	23.06%	7,034	166,612	24.08%	34,910	5.04%
VAP	511,518			112,315	21.96%	2,247	114,562	22.40%	22,243	4.35%
004	691,976	1	0.00%	397,911	57.50%	10,608	408,519	59.04%	64,605	9.34%
VAP	503,508			278,767	55.36%	5,240	284,007	56.41%	41,041	8.15%
005	691,976	1	0.00%	409,269	59.14%	9,031	418,300	60.45%	54,614	7.89%
VAP	541,900			306,497	56.56%	5,708	312,205	57.61%	37,210	6.87%
006	691,975	0	0.00%	86,265	12.47%	6,771	93,036	13.44%	92,409	13.35%
VAP	519,046			64,149	12.36%	3,330	67,479	13.00%	62,253	11.99%
007	691,975	0	0.00%	125,010	18.07%	8,298	133,308	19.26%	129,930	18.78%
VAP	489,868			83,770	17.10%	3,453	87,223	17.81%	82,112	16.76%
008	691,976	1	0.00%	204,995	29.62%	5,455	210,450	30.41%	39,578	5.72%
VAP	518,240			145,966	28.17%	1,898	147,864	28.53%	25,129	4.85%
009	691,975	0	0.00%	46,065	6.66%	3,675	49,740	7.19%	79,413	11.48%
VAP	520,856			33,384	6.41%	1,014	34,398	6.60%	46,597	8.95%
010	691,976	1	0.00%	172,398	24.91%	5,577	177,975	25.72%	32,589	4.71%
VAP	521,343			123,759	23.74%	1,963	125,722	24.12%	20,668	3.96%
011	691,975	0	0.00%	107,707	15.57%	7,554	115,261	16.66%	75,109	10.85%
VAP	512,598			76,732	14.97%	3,130	79,862	15.58%	47,452	9.26%
012	691,975	0	0.00%	238,190	34.42%	7,297	245,487	35.48%	36,890	5.33%
VAP	518,253			169,848	32.77%	2,741	172,589	33.30%	23,384	4.51%
013	691,976	1	0.00%	382,493	55.28%	11,657	394,150	56.96%	71,303	10.30%
VAP	495,652			262,130	52.89%	5,163	267,293	53.93%	43,142	8.70%
014	691,974	-1	0.00%	57,918	8.37%	5,428	63,346	9.15%	70,995	10.26%
VAP	508,184			40,501	7.97%	1,480	41,981	8.26%	41,291	8.13%

Plan Name: **Congress12**Plan Type : **Congress**User: **staff**Administrator: **State**

DISTRICT	POPULATION	DEVIATION	% DEVIATION	BLACK	% BLACK	BLACK COMBO	TOTAL BLACK	%TOTAL BLACK	HISP. OR LATINO	%HISP
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Total Population: 9,687,653

Ideal Value: 691,975

Summary Statistics

Population Range: 691,974 to 691,976

Absolute Overall Range: 2

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT F

Population Summary Report

Georgia U.S. House -- 2020 Census -- 2012 Benchmark Plan

District	Population	Deviation	% Deviation	AP Black	% AP Black	Latino	% Latino	NH White	% NH White
01	755781	-9355	-1.22%	230595	30.51%	59037	7.81%	431902	57.15%
02	673028	-92108	-12.04%	357993	53.19%	38403	5.71%	259967	38.63%
03	763075	-2061	-0.27%	210025	27.52%	49428	6.48%	467888	61.32%
04	773761	8625	1.13%	478654	61.86%	84862	10.97%	160581	20.75%
05	788126	22990	3.00%	450410	57.15%	65869	8.36%	229087	29.07%
06	765793	657	0.09%	111594	14.57%	107495	14.04%	425616	55.58%
07	859440	94304	12.33%	192903	22.45%	179379	20.87%	327075	38.06%
08	719919	-45217	-5.91%	234178	32.53%	49867	6.93%	410808	57.06%
09	775367	10231	1.34%	58090	7.49%	102240	13.19%	580920	74.92%
10	775012	9876	1.29%	204453	26.38%	52350	6.75%	480661	62.02%
11	802515	37379	4.89%	147155	18.34%	101218	12.61%	501446	62.48%
12	738624	-26512	-3.47%	270885	36.67%	49500	6.70%	390796	52.91%
13	792916	27780	3.63%	509032	64.20%	95919	12.10%	164627	20.76%
14	728551	-36585	-4.78%	82179	11.28%	87890	12.06%	530782	72.85%
Total	10711908		24.37%	3538146	33.03%	1123457	10.49%	5362156	50.06%

District	18+ Pop	18+ SR Black	% 18+ SR Black	18+ AP Black	% 18+ AP Black	18+ Latino	% 18+ Latino	18+ NH White	% 18+ NH White
01	582105	157603	27.07%	165850	28.49%	39826	6.84%	349176	59.99%
02	518145	257952	49.78%	264896	51.12%	25509	4.92%	214262	41.35%
03	583475	144198	24.71%	151383	25.95%	32235	5.52%	373021	63.93%
04	587002	342687	58.38%	357025	60.82%	55810	9.51%	136384	23.23%
05	635913	337506	53.07%	350672	55.14%	47194	7.42%	200864	31.59%
06	589600	76565	12.99%	85256	14.46%	72875	12.36%	342630	58.11%
07	635791	125592	19.75%	136048	21.40%	120021	18.88%	261700	41.16%
08	549306	163622	29.79%	169305	30.82%	32639	5.94%	328086	59.73%
09	603376	37833	6.27%	41315	6.85%	64783	10.74%	471167	78.09%
10	599155	143138	23.89%	149396	24.93%	34397	5.74%	386676	64.54%
11	622759	100488	16.14%	109414	17.57%	67723	10.87%	404958	65.03%
12	565091	189400	33.52%	197124	34.88%	32450	5.74%	313867	55.54%
13	596630	359769	60.30%	373783	62.65%	62186	10.42%	140659	23.58%
14	551926	52066	9.43%	56519	10.24%	55270	10.01%	418883	75.89%
Total	8220274	2488419	30.27%	2607986	31.73%	742918	9.04%	4342333	52.82%

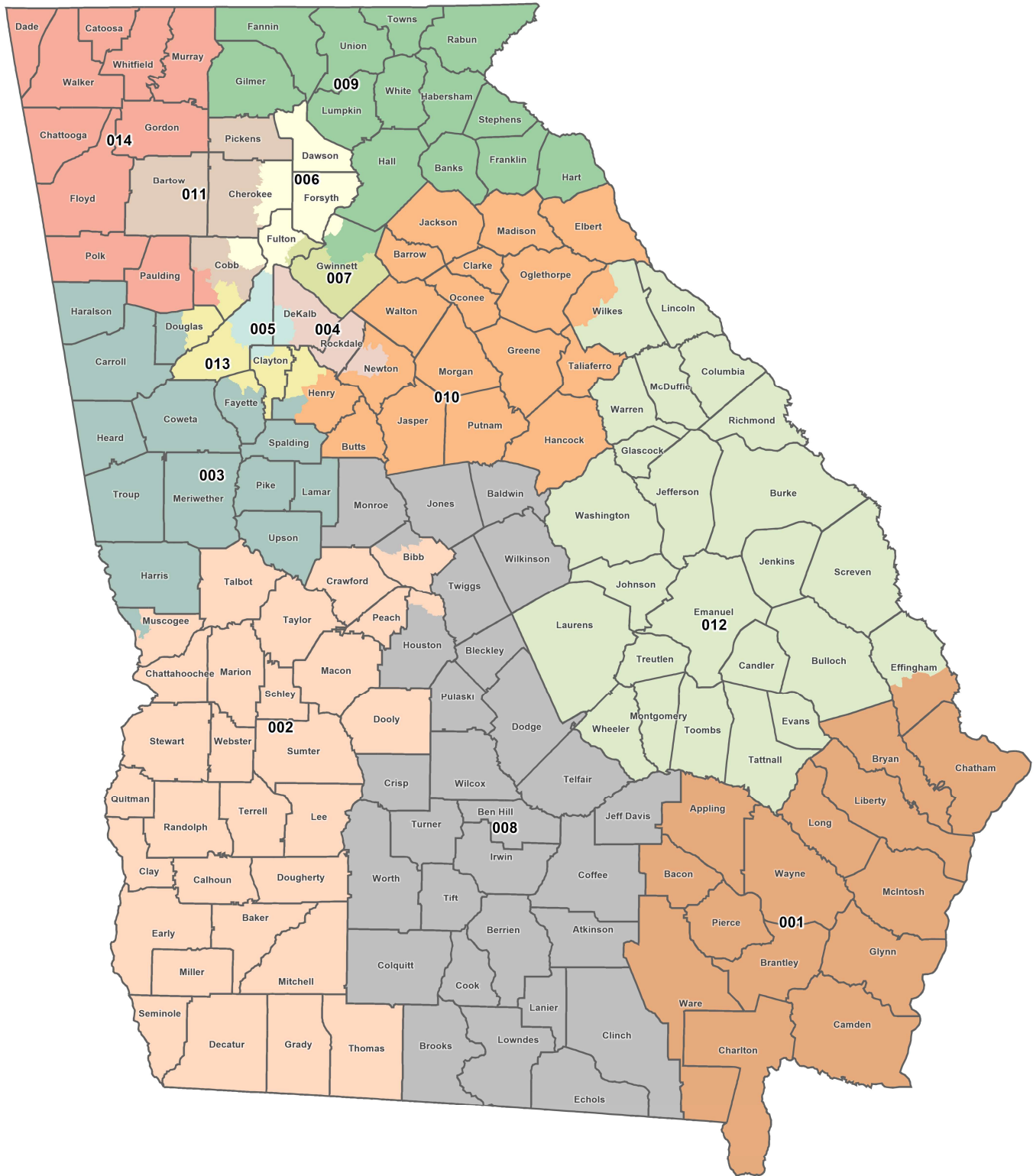
District	% NH Single-Race Black CVAP*	% Latino CVAP	% NH Single-Race Asian CVAP*	% SR NH White CVAP
001	30.09%	4.47%	1.55%	62.88%
002	51.78%	2.96%	1.00%	43.47%
003	24.88%	3.61%	1.60%	69.06%
004	63.91%	3.95%	3.45%	27.85%
005	59.21%	3.50%	3.41%	33.18%
006	15.20%	5.78%	8.07%	70.14%
007	22.46%	9.90%	11.84%	54.91%
008	31.28%	3.20%	1.28%	63.51%
009	7.15%	5.32%	1.12%	85.39%
010	25.49%	3.29%	1.89%	68.68%
011	17.37%	5.62%	2.67%	73.54%
012	35.23%	3.75%	1.45%	58.83%
013	61.85%	5.45%	2.46%	29.45%
014	9.57%	5.27%	0.85%	83.31%

Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates (with a survey midpoint of July 2017)

Source for CVAP disaggregation: Redistricting Data Hub

<https://redistrictingdatahub.org/dataset/georgia-cvap-data-disaggregated-to-the-2020-block-level-2019/>

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT G

Proposed Joint Congressional Districts of Georgia

Legislative and Congressional
Reapportionment Office

Georgia General Assembly
Suite 407 Coverdell Legislative Office Bldg.

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Map layers

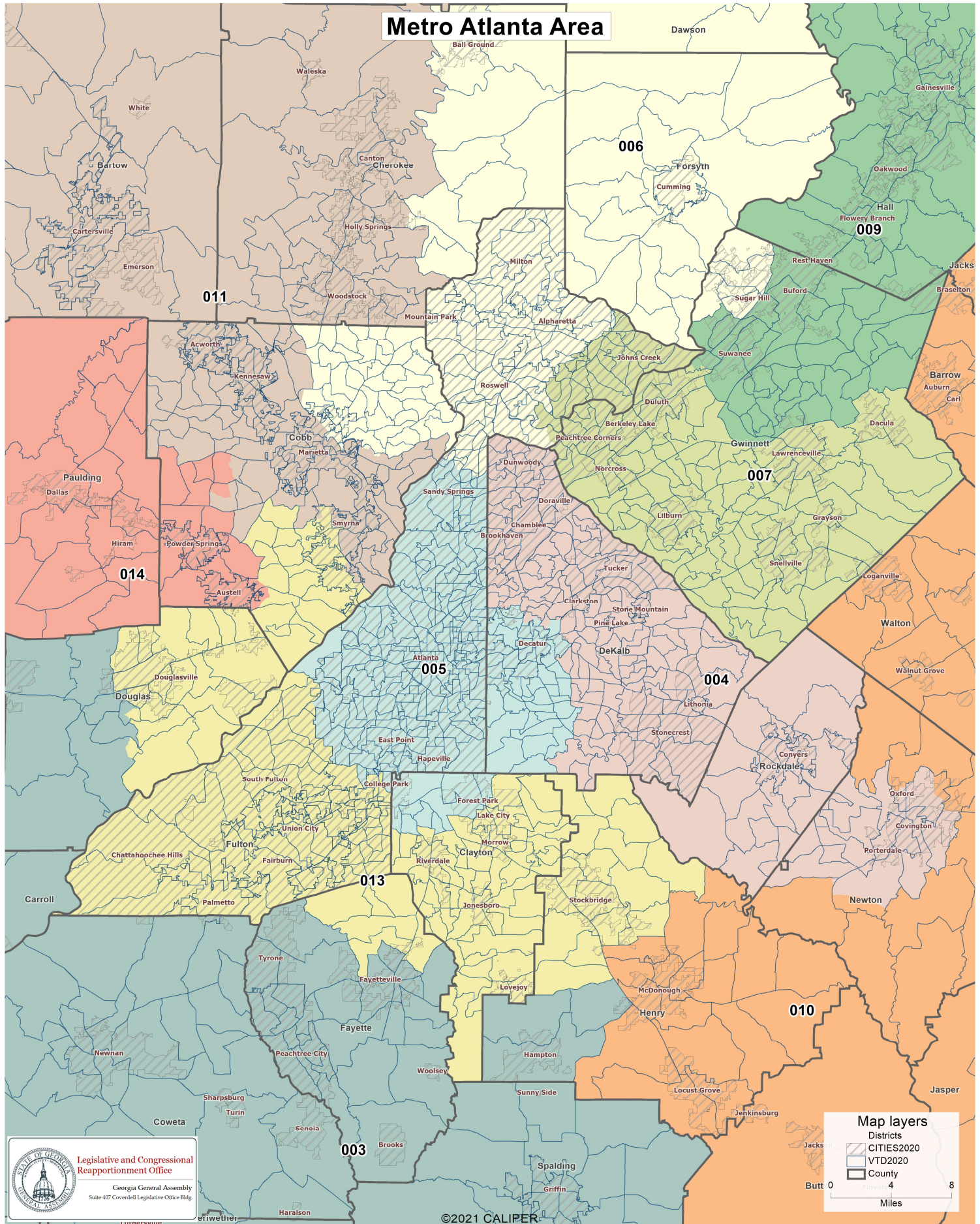
Districts

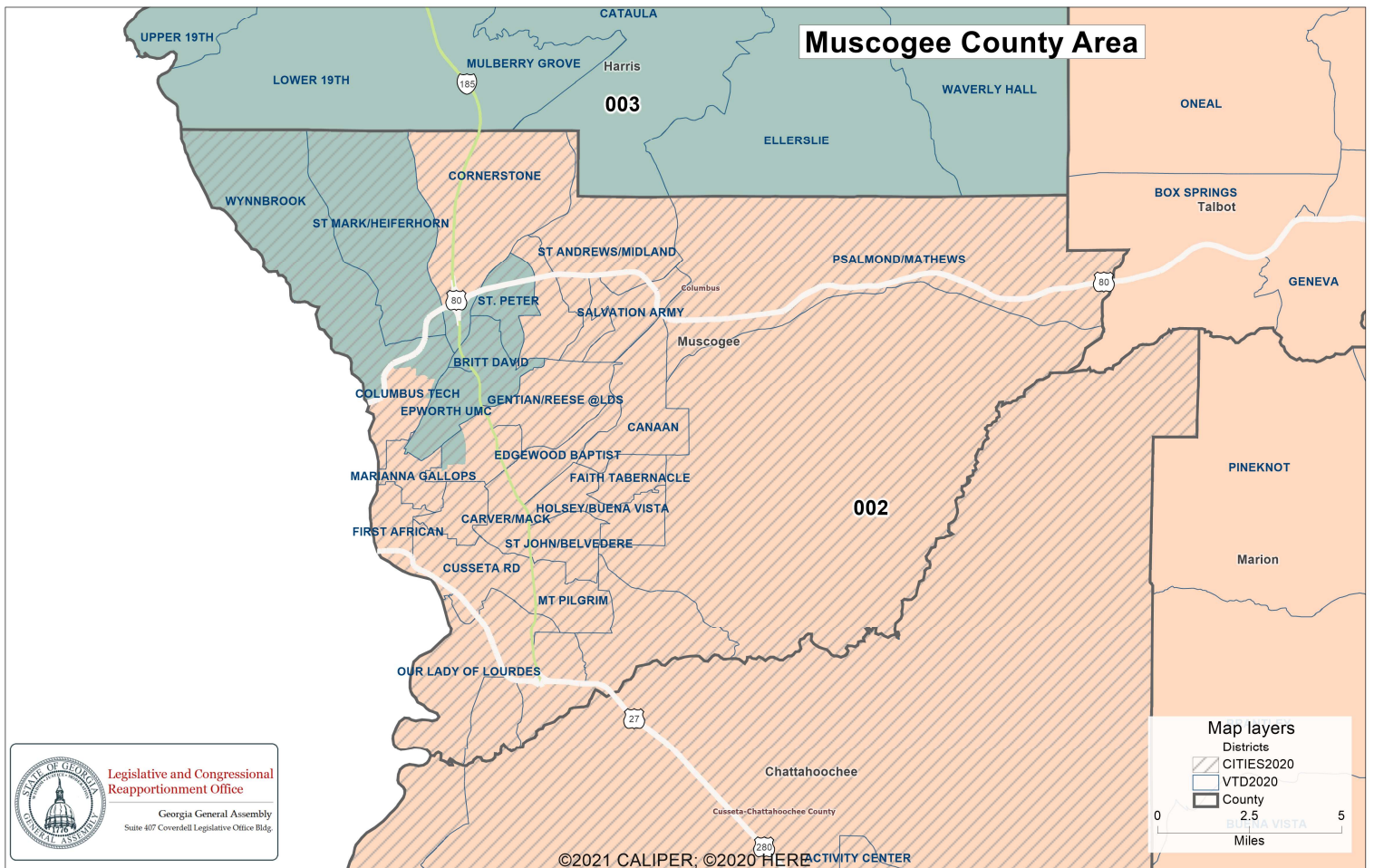
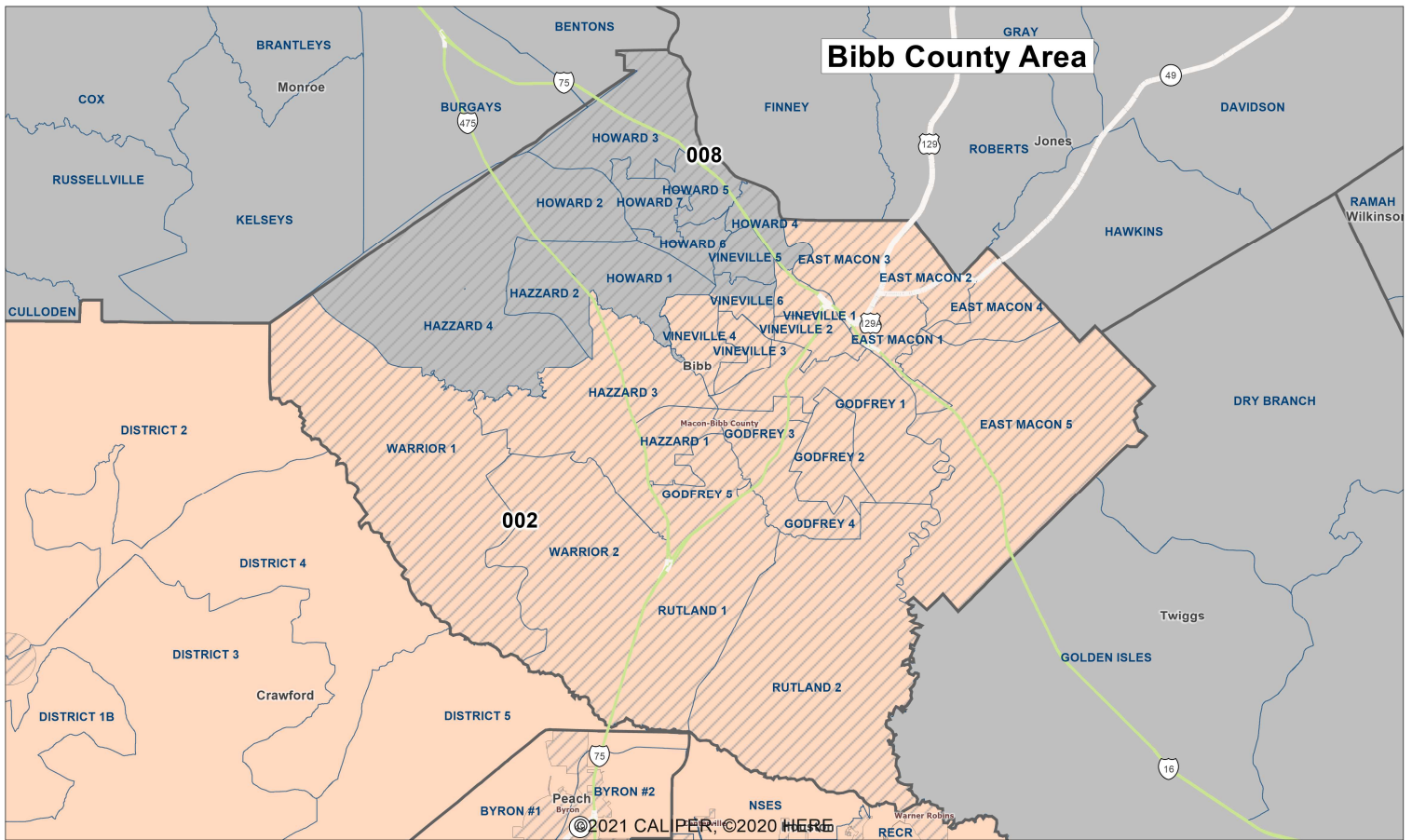


County

0 20 40
Miles

Proposed Joint Congressional Districts of Georgia



Proposed Joint Congressional Districts of Georgia

Legislative and Congressional
Reapportionment Office

Georgia General Assembly
Suite 407 Cowdell Legislative Office Bldg.

User: S018

Plan Name: Congress-prop1-2021

Plan Type: Congress

Population Summary

Summary Statistics:

Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.71
Relative Mean Deviation:	0.00%
Standard Deviation:	0.80

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH_Wht]	[% NH_Blkl]	[% Hispanic Origin]	[% NH_Asn]	[% NH_Ind]	[% NH_Hwn]	[% NH_Oth]	[% NH_2+ Races]
001	765,137	1	0.00%	589,266	77.01%	57.59%	27.54%	7.75%	2.19%	0.24%	0.16%	0.44%	4.1%
002	765,137	1	0.00%	587,555	76.79%	39.94%	49.03%	5.95%	1.34%	0.21%	0.1%	0.34%	3.09%
003	765,136	0	0.00%	586,319	76.63%	64.37%	22.61%	6.31%	2.09%	0.21%	0.04%	0.47%	3.91%
004	765,135	-1	0.00%	589,470	77.04%	25.82%	52.19%	11.63%	6.13%	0.16%	0.04%	0.65%	3.39%
005	765,137	1	0.00%	621,515	81.23%	35.79%	48.53%	7.38%	4.09%	0.16%	0.04%	0.52%	3.49%
006	765,136	0	0.00%	574,797	75.12%	63.7%	8.58%	10.23%	12.4%	0.16%	0.04%	0.69%	4.21%
007	765,137	1	0.00%	566,934	74.1%	29.52%	28.11%	23.77%	14.26%	0.16%	0.04%	0.69%	3.45%
008	765,136	0	0.00%	585,857	76.57%	57.91%	29.72%	7.17%	1.56%	0.19%	0.05%	0.31%	3.09%
009	765,137	1	0.00%	592,520	77.44%	64.7%	9.72%	15.39%	5.95%	0.2%	0.04%	0.42%	3.59%
010	765,135	-1	0.00%	588,874	76.96%	63.58%	22.12%	7.66%	2.26%	0.17%	0.04%	0.53%	3.63%
011	765,137	1	0.00%	595,201	77.79%	61.33%	16.33%	13.04%	3.76%	0.19%	0.04%	0.82%	4.49%
012	765,136	0	0.00%	588,119	76.86%	52.13%	36.12%	5.63%	1.83%	0.21%	0.11%	0.36%	3.61%
013	765,137	1	0.00%	574,789	75.12%	16.35%	64.26%	12.23%	3.17%	0.18%	0.05%	0.66%	3.1%
014	765,135	-1	0.00%	579,058	75.68%	68.07%	13.58%	12.69%	1.14%	0.22%	0.05%	0.4%	3.85%

Total: 10,711,908

Ideal District: 765,136

User: S018

Plan Name: Congress-prop1-2021

Plan Type: Congress

Population Summary

Summary Statistics:

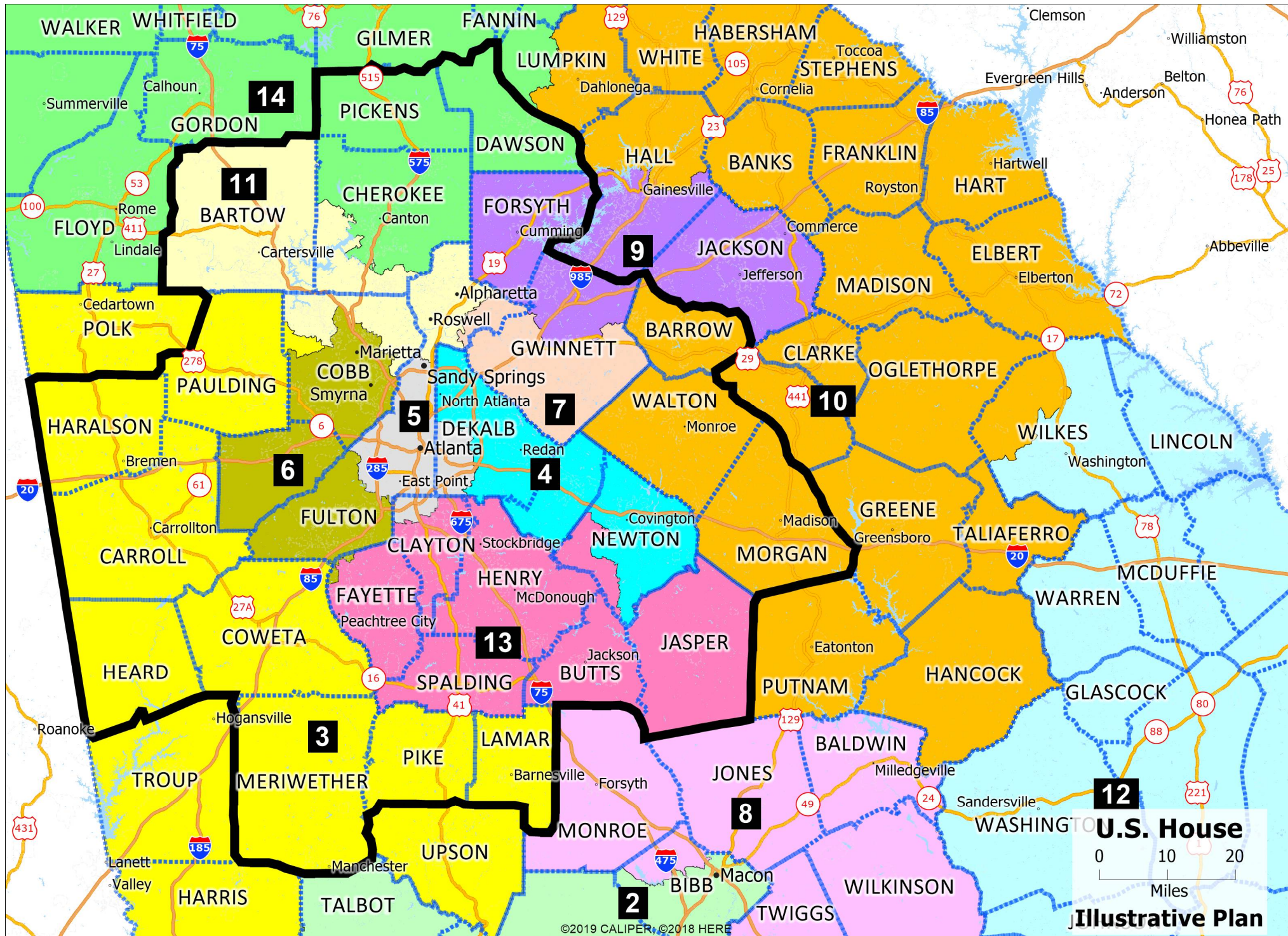
Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.71
Relative Mean Deviation:	0.00%
Standard Deviation:	0.80

District	Population	Deviation	% Devn.	[18+_Pop]	[% 18+_Pop]	[% NH18+_Wht]	[% NH18+_Blk]	[% H18+_Pop]	[% NH18+_Asn]	[% NH18+_Ind]	[% NH18+_Hwn]	[% NH18+_Oth]	[% NH18+_2+ Races]
001	765,137	1	0.00%	589,266	77.01%	60.41%	26.44%	6.78%	2.36%	0.26%	0.14%	0.37%	3.24%
002	765,137	1	0.00%	587,555	76.79%	42.73%	47.62%	5.12%	1.41%	0.23%	0.09%	0.28%	2.53%
003	765,136	0	0.00%	586,319	76.63%	66.83%	22%	5.33%	2.08%	0.22%	0.04%	0.38%	3.11%
004	765,135	-1	0.00%	589,470	77.04%	28.25%	51.79%	10.12%	6.09%	0.16%	0.04%	0.58%	2.96%
005	765,137	1	0.00%	621,515	81.23%	37.92%	47.14%	6.67%	4.53%	0.16%	0.04%	0.48%	3.07%
006	765,136	0	0.00%	574,797	75.12%	66.63%	8.61%	9.11%	11.44%	0.14%	0.04%	0.63%	3.41%
007	765,137	1	0.00%	566,934	74.1%	32.78%	27.35%	21.27%	14.97%	0.16%	0.04%	0.59%	2.85%
008	765,136	0	0.00%	585,857	76.57%	60.52%	28.84%	6.1%	1.6%	0.2%	0.05%	0.25%	2.43%
009	765,137	1	0.00%	592,520	77.44%	68.29%	9.37%	12.89%	5.94%	0.21%	0.03%	0.34%	2.92%
010	765,135	-1	0.00%	588,874	76.96%	66.2%	21.34%	6.51%	2.3%	0.19%	0.03%	0.46%	2.98%
011	765,137	1	0.00%	595,201	77.79%	63.99%	16.25%	11.22%	3.82%	0.2%	0.04%	0.75%	3.73%
012	765,136	0	0.00%	588,119	76.86%	54.65%	35.06%	4.87%	1.95%	0.22%	0.1%	0.3%	2.86%
013	765,137	1	0.00%	574,789	75.12%	18.82%	63.75%	10.52%	3.38%	0.19%	0.05%	0.61%	2.68%
014	765,135	-1	0.00%	579,058	75.68%	71.33%	13.14%	10.58%	1.17%	0.23%	0.04%	0.32%	3.2%

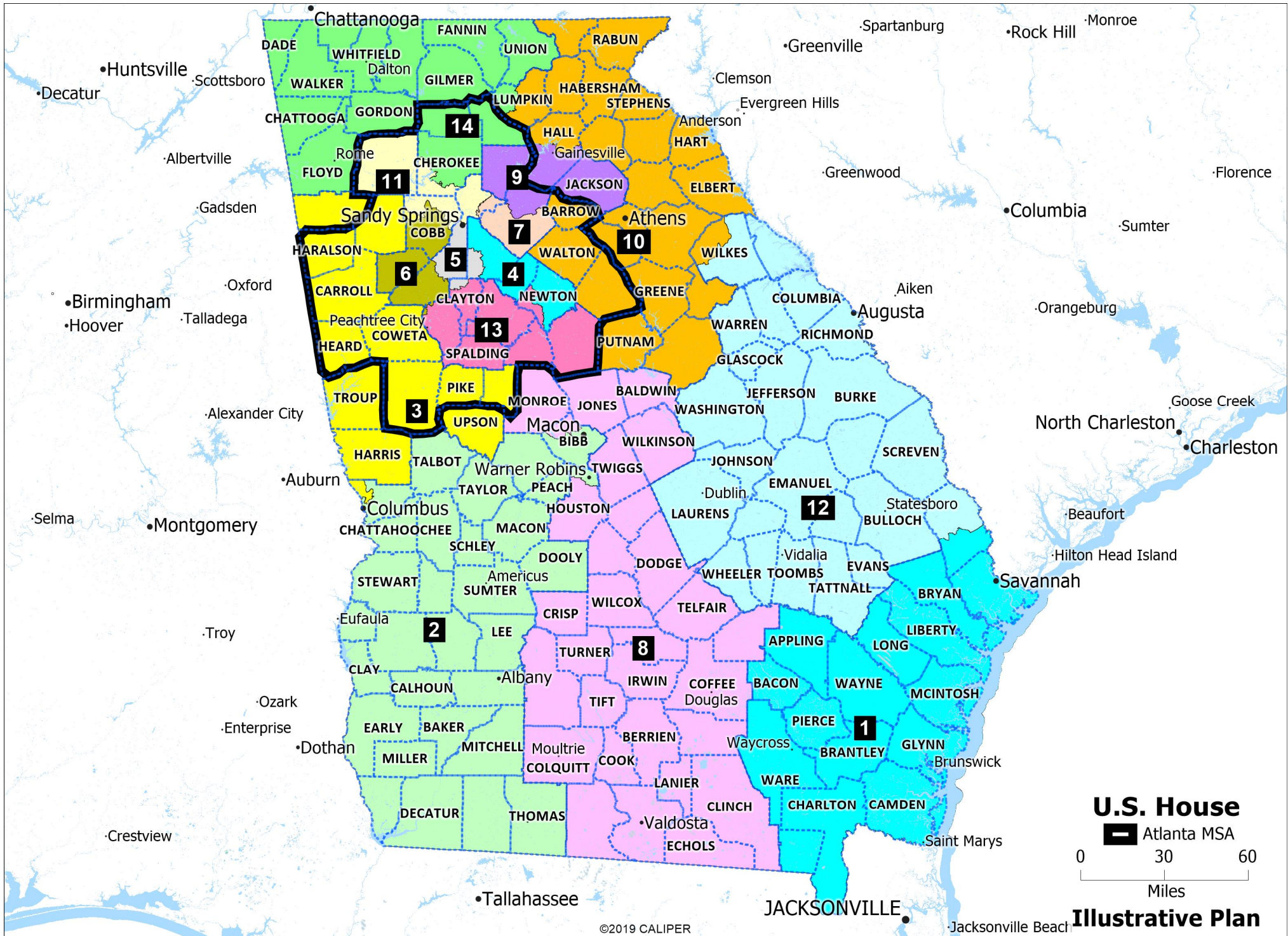
Total: 10,711,908

Ideal District: 765,136

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT H-1



DECLARATION OF WILLIAM S. COOPER:
EXHIBIT H-2



DECLARATION OF WILLIAM S. COOPER:
EXHIBIT I-1

Population Summary Report

Georgia U.S. House -- 2020 Census -- Illustrative Plan

District	Population	Deviation	% Deviation	AP Black	% AP Black	Latino	% Latino	NH White	% NH White
001	765137	1	0.00%	230783	30.16%	59328	7.75%	440636	57.59%
002	765137	1	0.00%	393195	51.39%	45499	5.95%	305611	39.94%
003	765135	-1	0.00%	166096	21.71%	49935	6.53%	517659	67.66%
004	765136	0	0.00%	410019	53.59%	87756	11.47%	212004	27.71%
005	765137	1	0.00%	392822	51.34%	56496	7.38%	273819	35.79%
006	765137	1	0.00%	396891	51.87%	108401	14.17%	225985	29.54%
007	765137	1	0.00%	239717	31.33%	181851	23.77%	225905	29.52%
008	765136	0	0.00%	241628	31.58%	54850	7.17%	443123	57.91%
009	765136	0	0.00%	94059	12.29%	128393	16.78%	429340	56.11%
010	765137	1	0.00%	118199	15.45%	61244	8.00%	548312	71.66%
011	765137	1	0.00%	110368	14.42%	81466	10.65%	492121	64.32%
012	765136	0	0.00%	294961	38.55%	43065	5.63%	398843	52.13%
013	765135	-1	0.00%	404963	52.93%	71377	9.33%	253135	33.08%
014	765135	-1	0.00%	44445	5.81%	93796	12.26%	595663	77.85%
Total	10711908		0.00%	3538146	33.03%	1123457	10.49%	5362156	50.06%

District	18+ Pop	18+ SR Black	% 18+ SR Black	18+ AP Black	% 18+ AP Black	18+ Latino	% 18+ Latino	18+ NH White	% 18+ NH White
001	589266	157770	26.77%	166025	28.17%	39938	6.78%	355947	60.41%
002	587555	281564	47.92%	289612	49.29%	30074	5.12%	251047	42.73%
003	580018	112454	19.39%	118709	20.47%	31852	5.49%	405926	69.99%
004	590640	298897	50.61%	311670	52.77%	58947	9.98%	177832	30.11%
005	621515	295885	47.61%	308271	49.60%	41432	6.67%	235652	37.92%
006	587247	282051	48.03%	294976	50.23%	71798	12.23%	192370	32.76%
007	566934	157650	27.81%	169071	29.82%	120604	21.27%	185838	32.78%
008	585857	170421	29.09%	175967	30.04%	35732	6.10%	354572	60.52%
009	564244	59821	10.60%	65790	11.66%	83453	14.79%	335720	59.50%
010	602127	81481	13.53%	86178	14.31%	39876	6.62%	447109	74.25%
011	588795	72303	12.28%	80507	13.67%	55168	9.37%	393920	66.90%
012	588119	207872	35.35%	215958	36.72%	28628	4.87%	321394	54.65%
013	576337	283204	49.14%	294669	51.13%	46150	8.01%	207154	35.94%
014	591620	27046	4.57%	30583	5.17%	59266	10.02%	477852	80.77%
Total	8220274	2488419	30.27%	2607986	31.73%	742918	9.04%	4342333	52.82%

District	% NH Single-Race Black CVAP*	% NH DOJ Black CVAP**	% Latino CVAP	% SR NH White CVAP
001	29.16%	29.67%	4.49%	63.10%
002	49.55%	50.001%	3.17%	44.62%
003	19.64%	20.02%	3.61%	74.12%
004	55.62%	56.37%	3.89%	35.11%
005	51.64%	52.35%	3.48%	39.75%
006	50.18%	50.98%	6.45%	39.13%
007	31.88%	32.44%	11.20%	43.69%
008	30.46%	30.76%	3.79%	63.40%
009	11.29%	11.74%	8.78%	71.51%
010	15.09%	15.39%	3.93%	78.27%
011	12.91%	13.48%	5.92%	74.73%
012	36.60%	37.19%	3.39%	56.94%
013	49.64%	50.34%	4.96%	40.44%
014	4.80%	5.19%	5.57%	87.19%

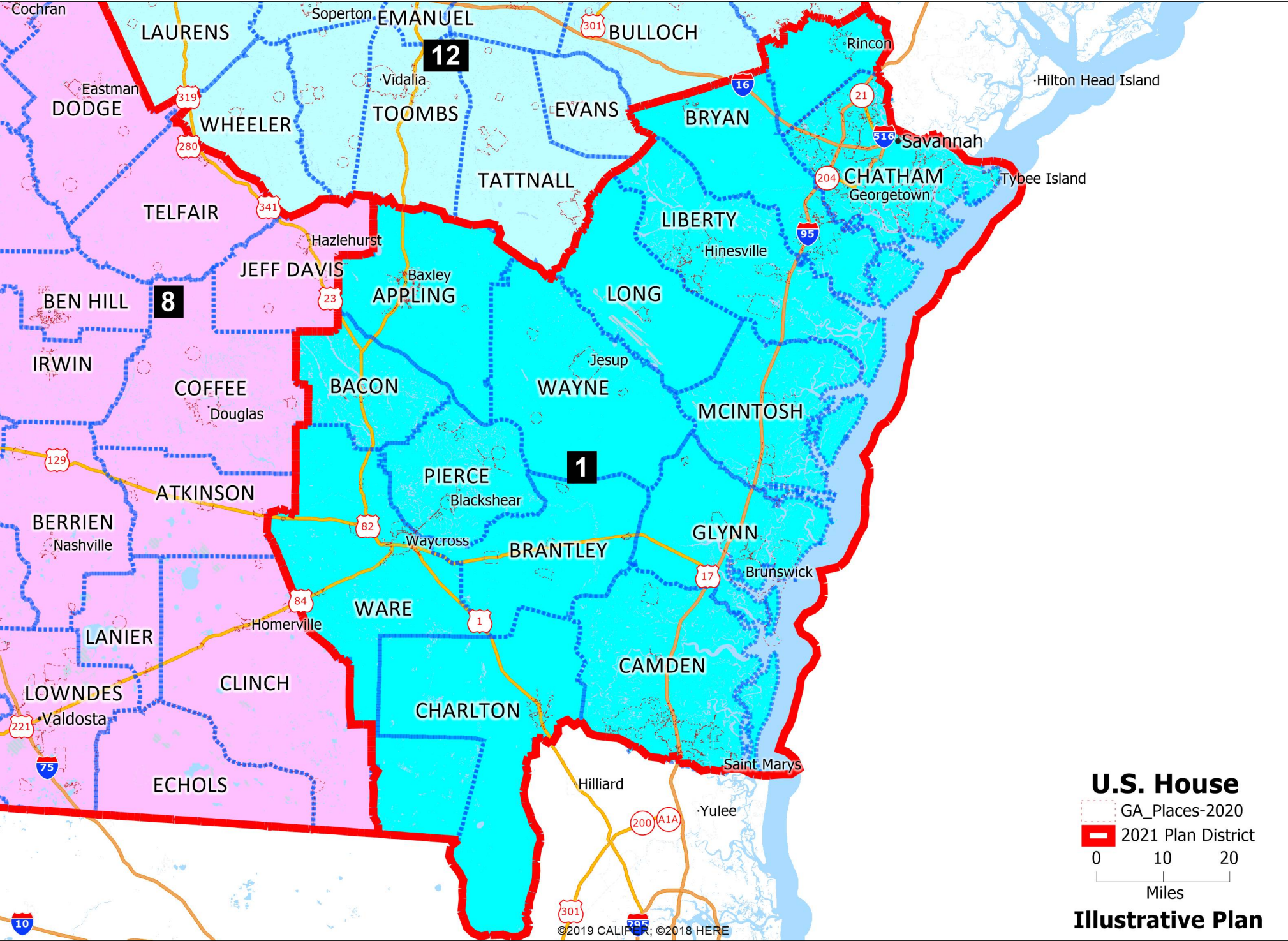
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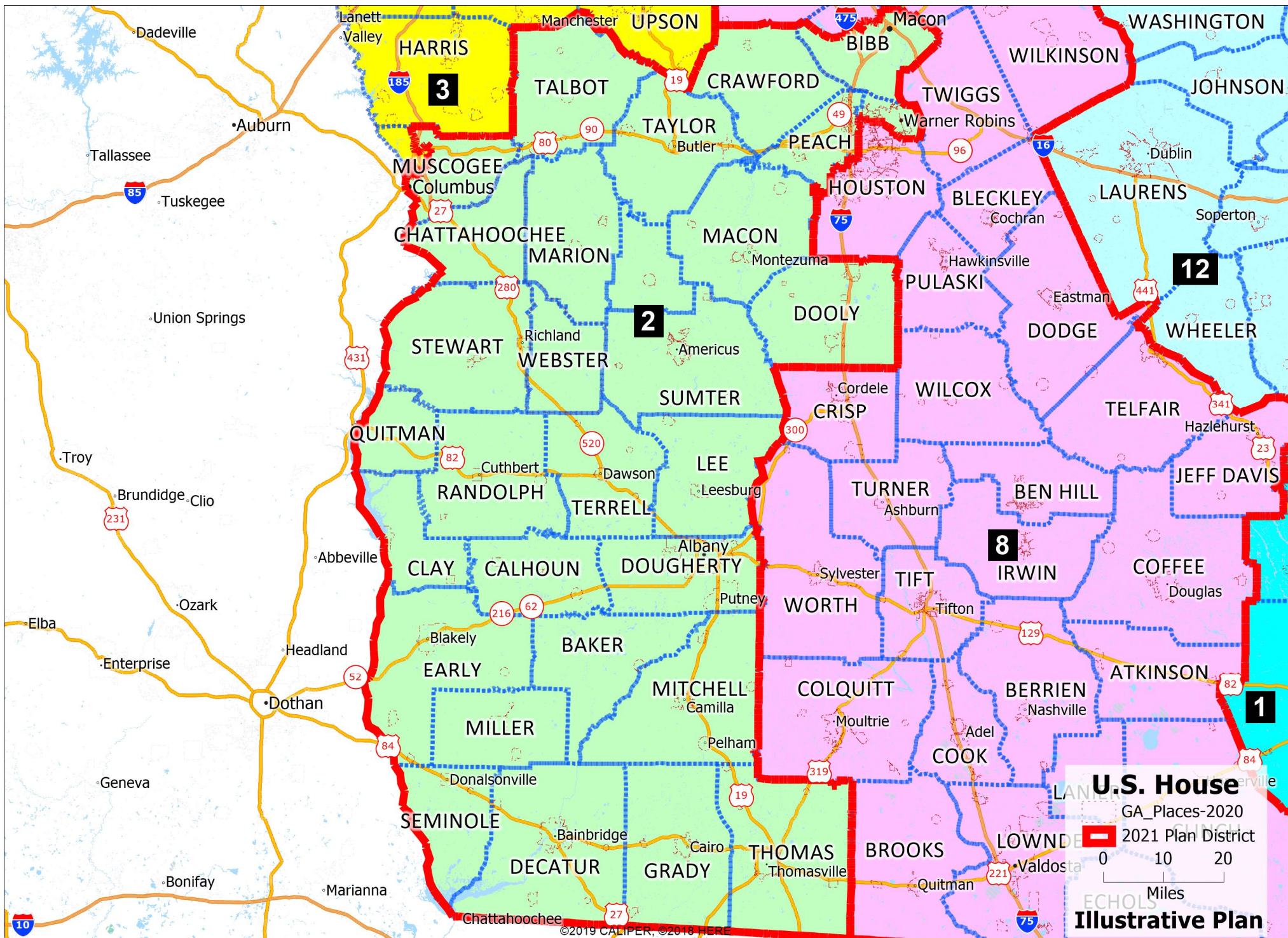
* 2016-20 ACS Special Tabulation <https://redistrictingdatahub.org/dataset/georgia-cvap-data-disaggregated-to-the-block-level-2020/>

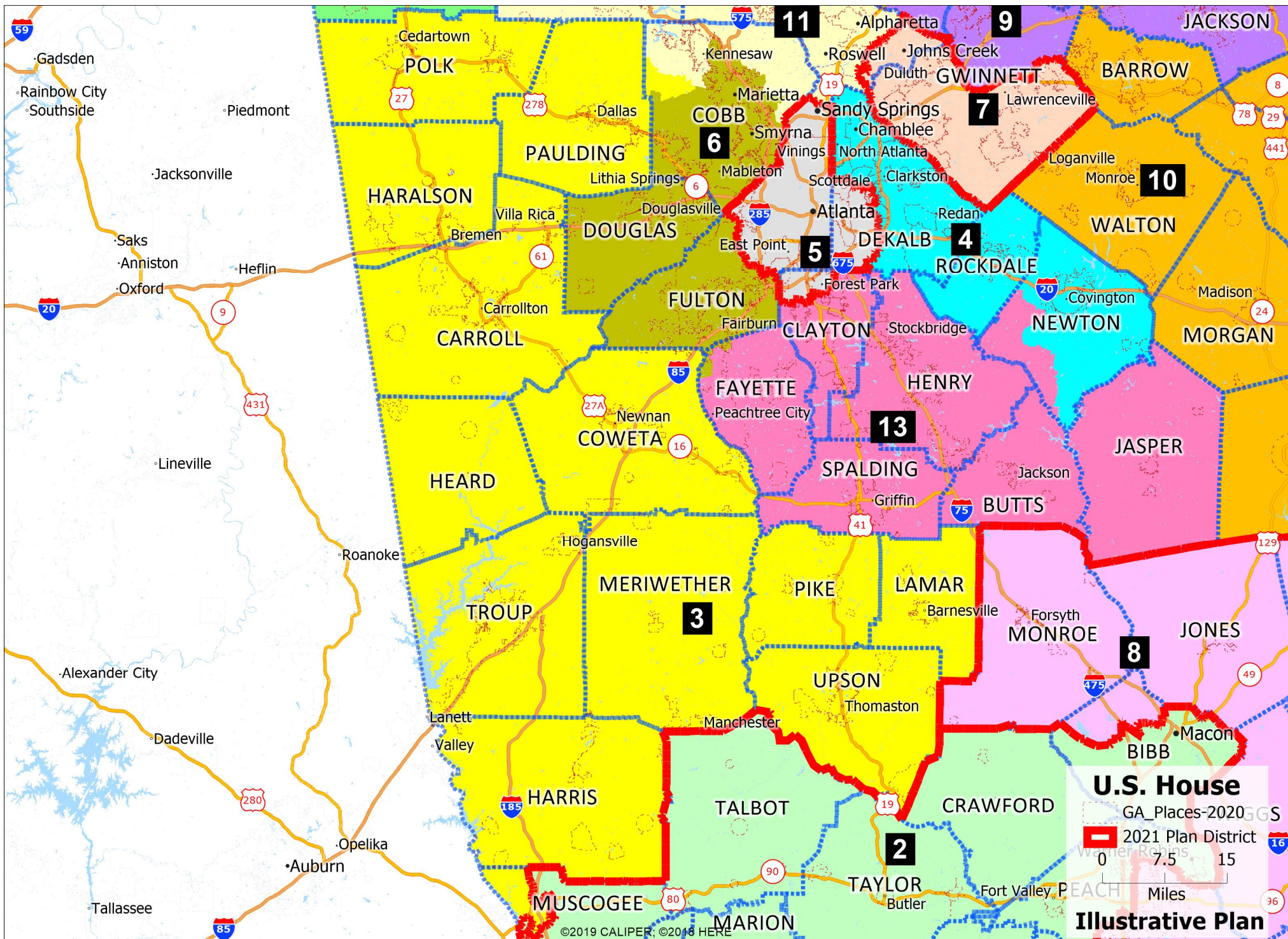
Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates

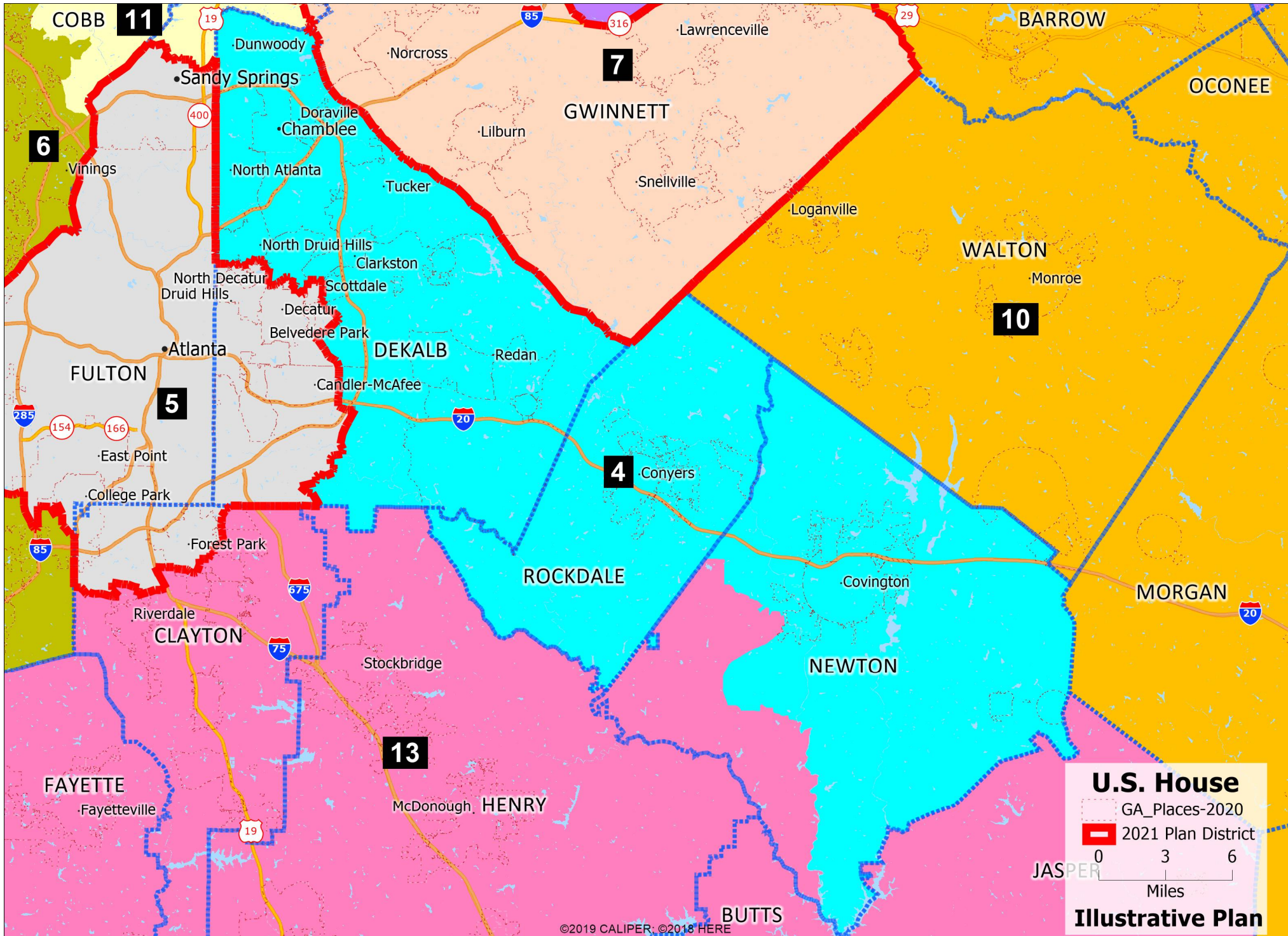
* Single race NH Black CVAP, **NH DOJ Black= SR NH Black CVAP+SR NH Black/White CVAP

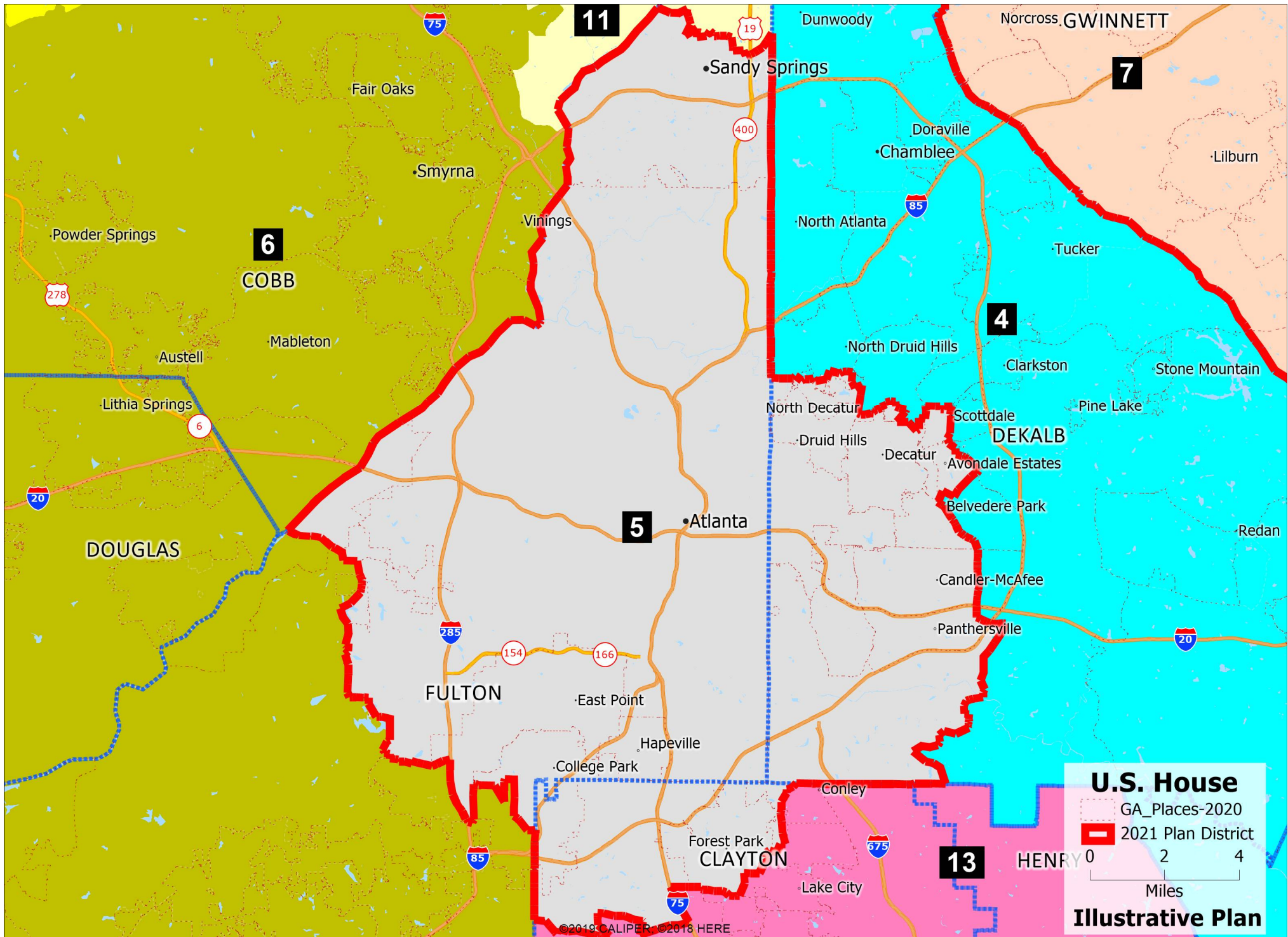
DECLARATION OF WILLIAM S. COOPER:
EXHIBIT I-2

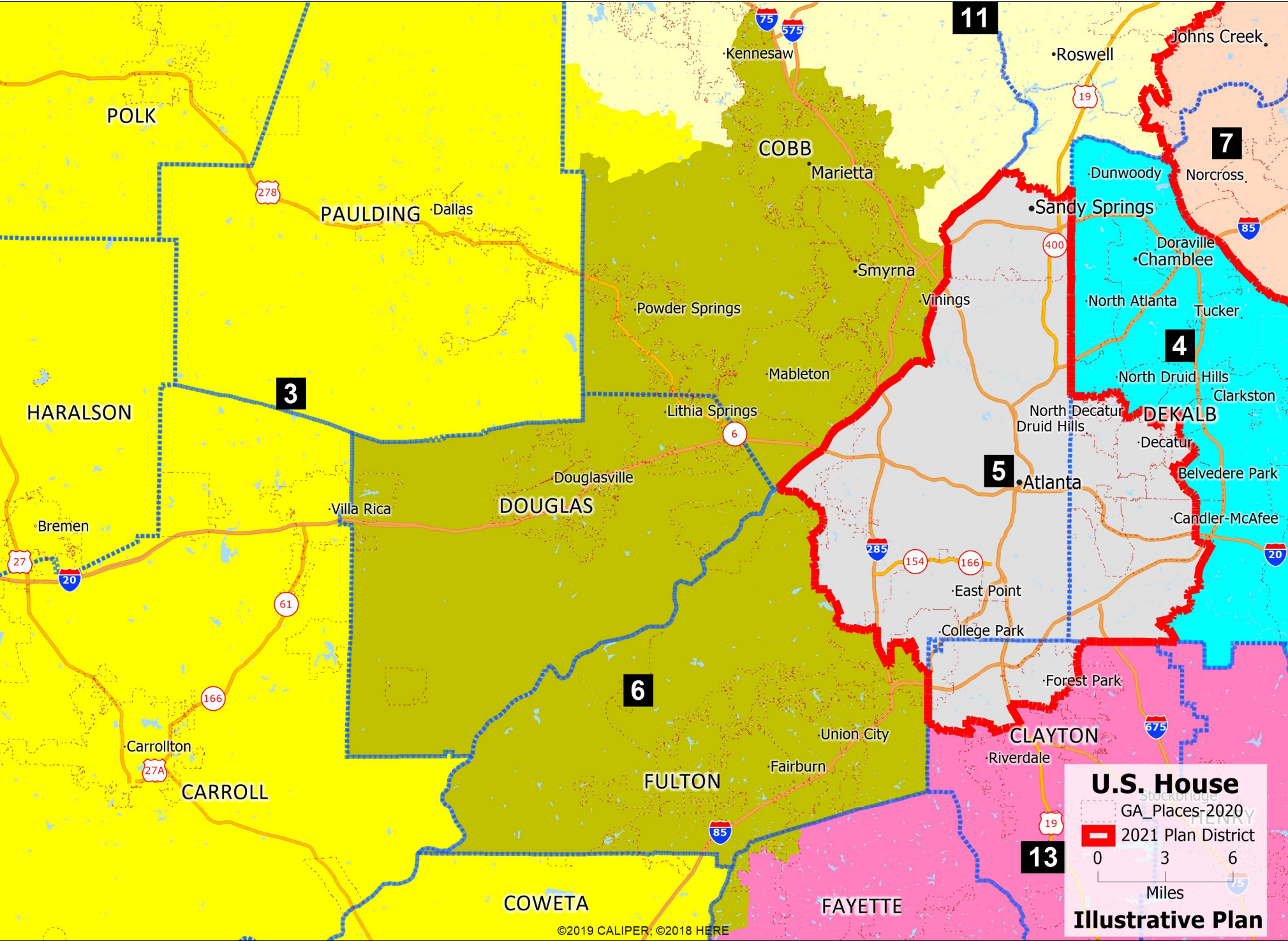


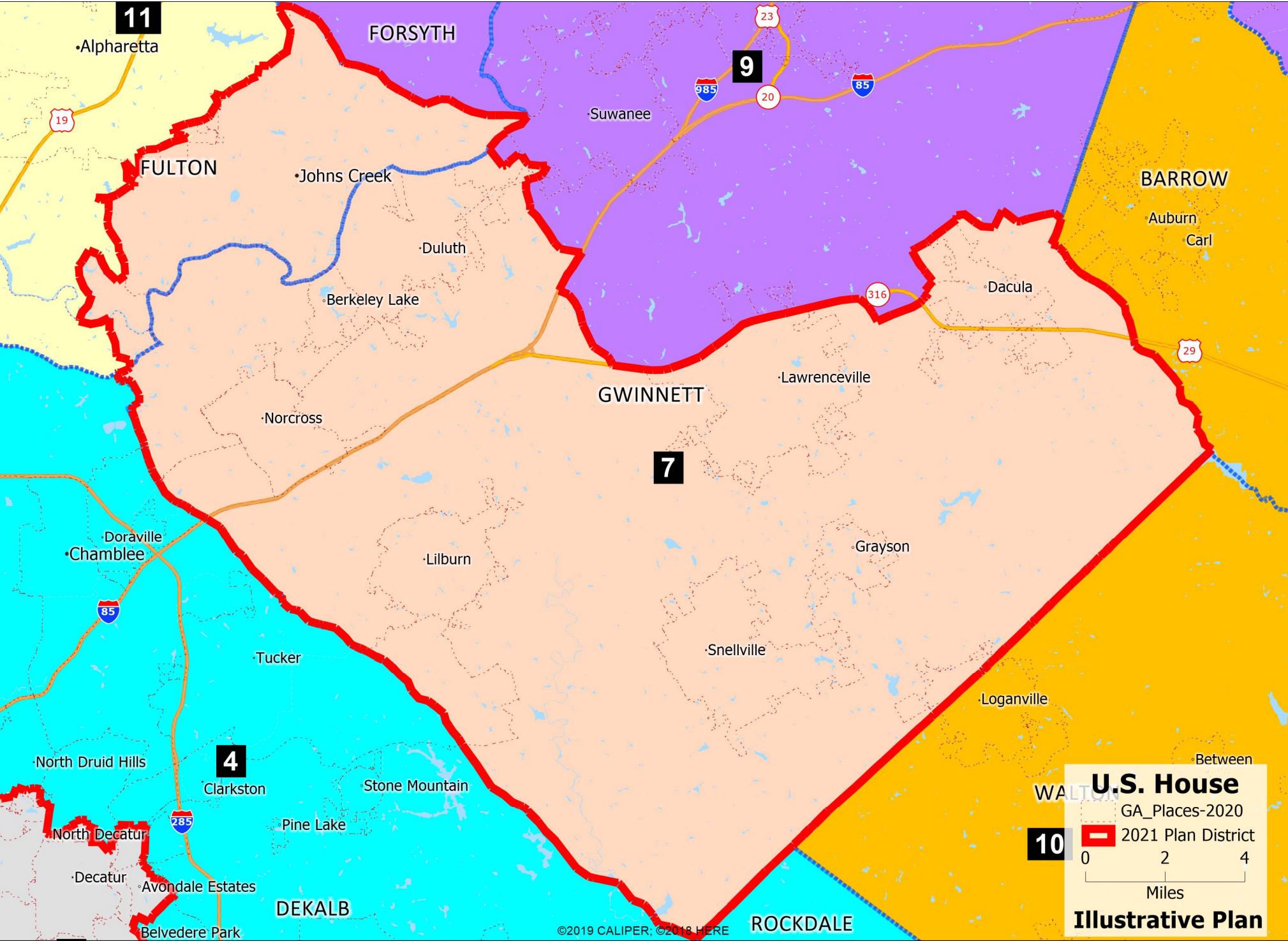


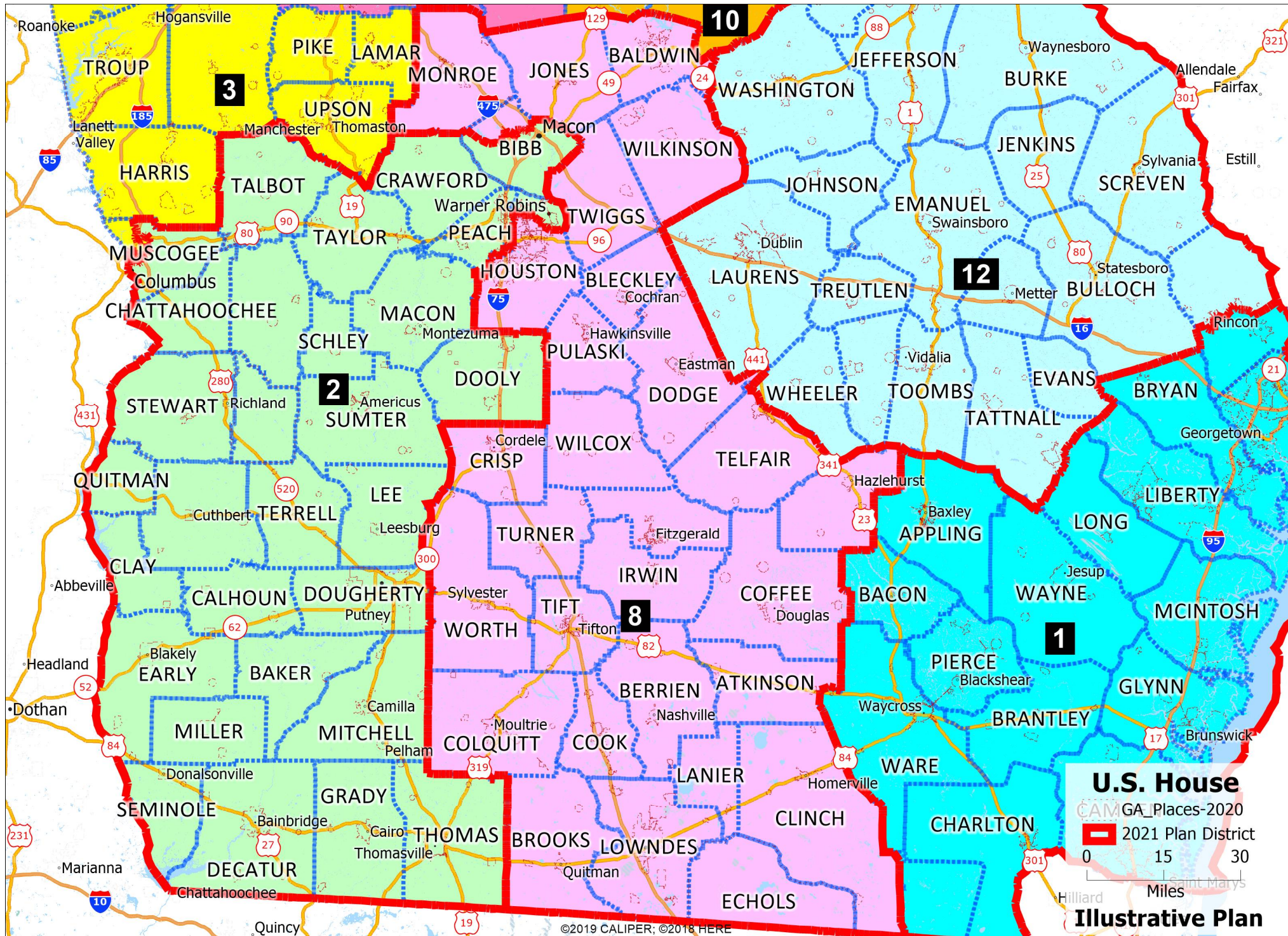


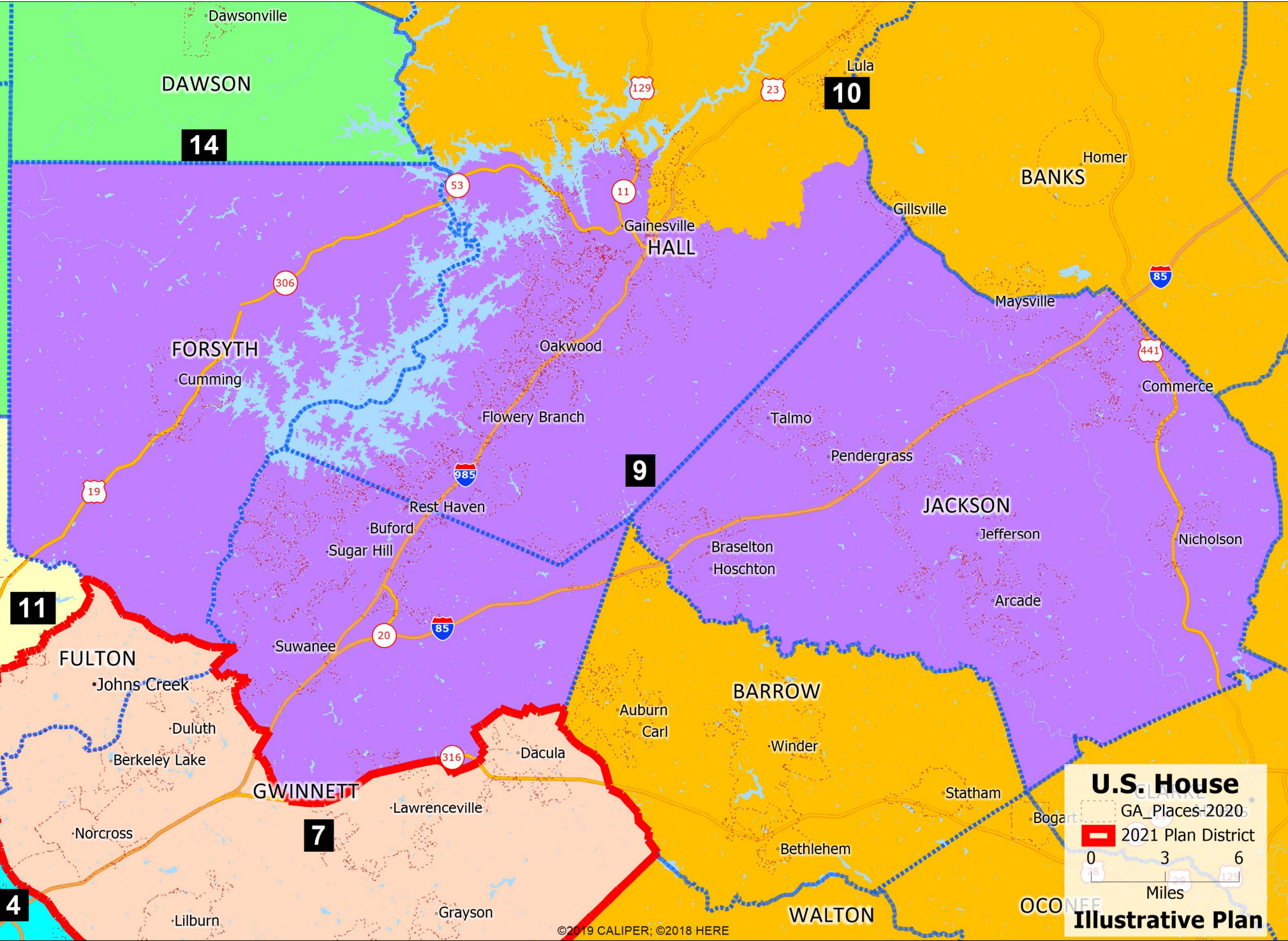


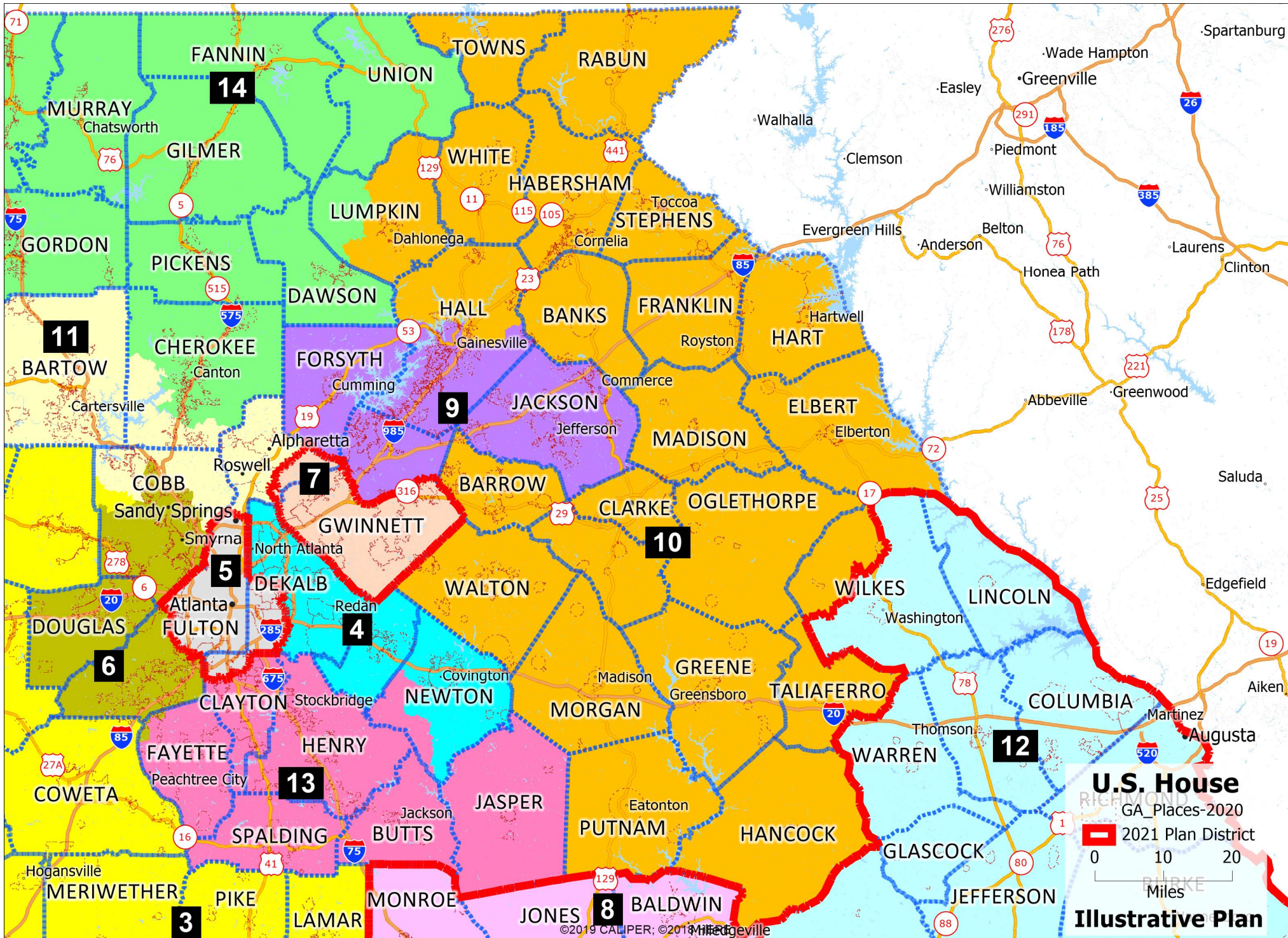


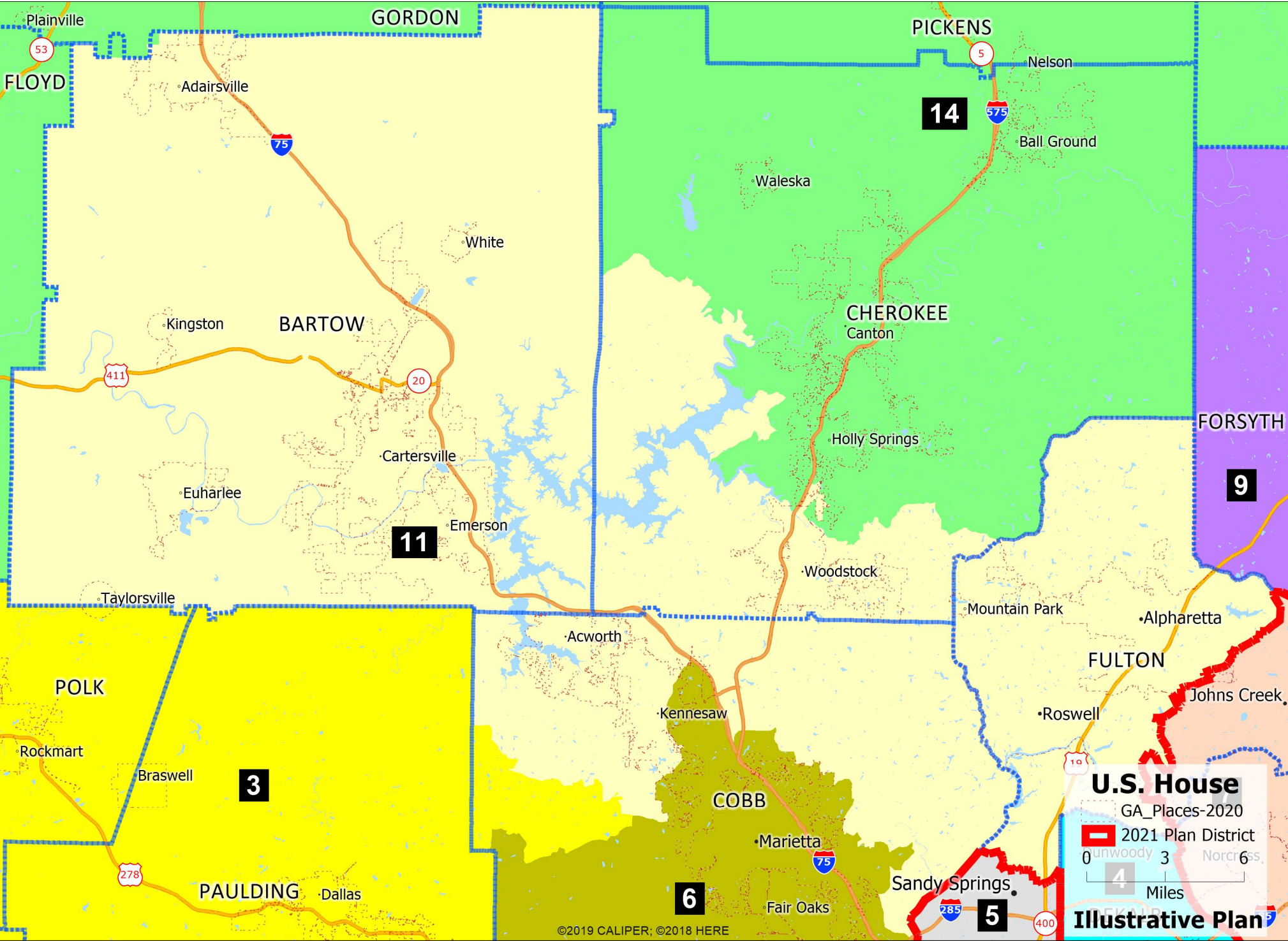


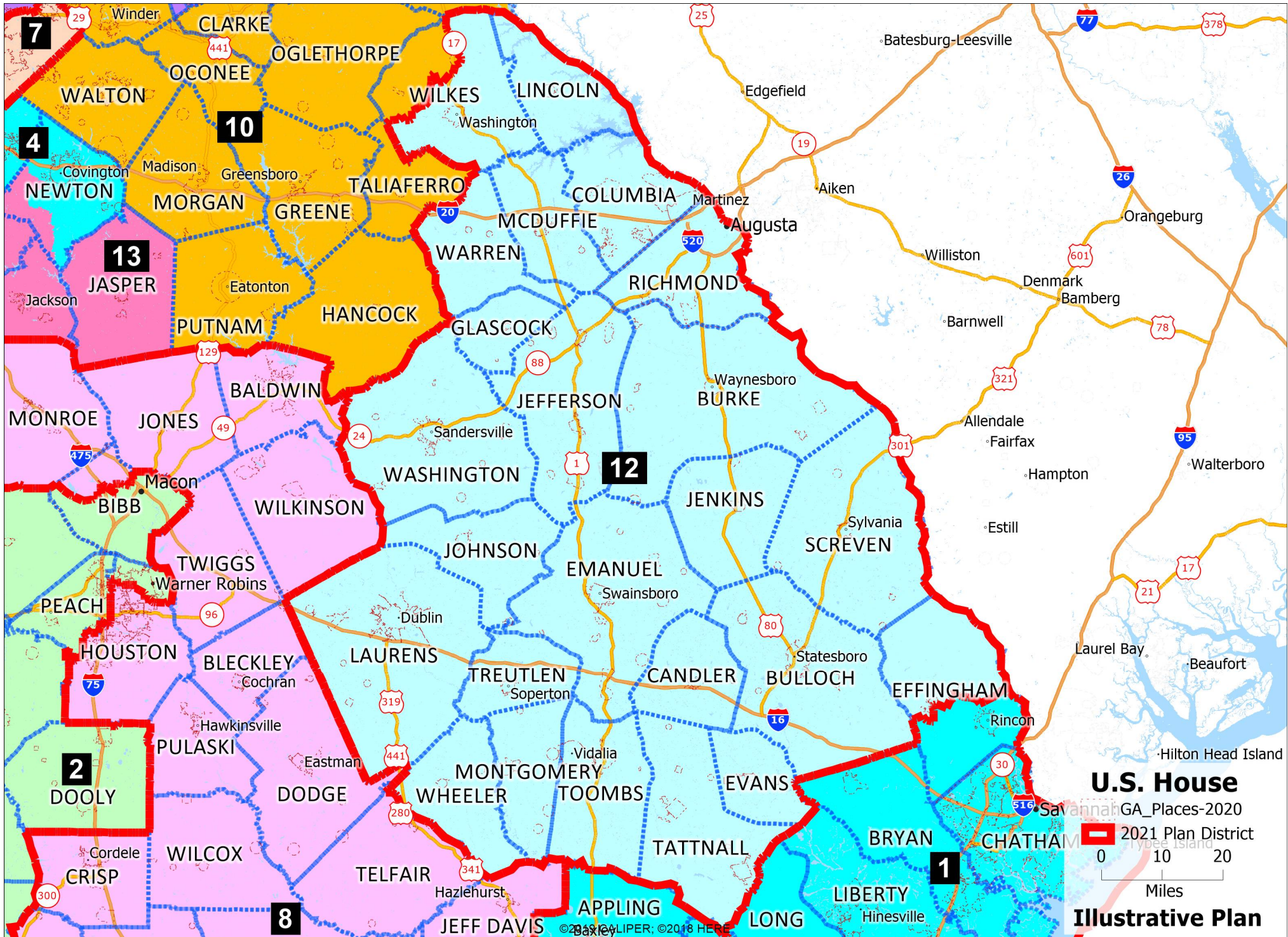


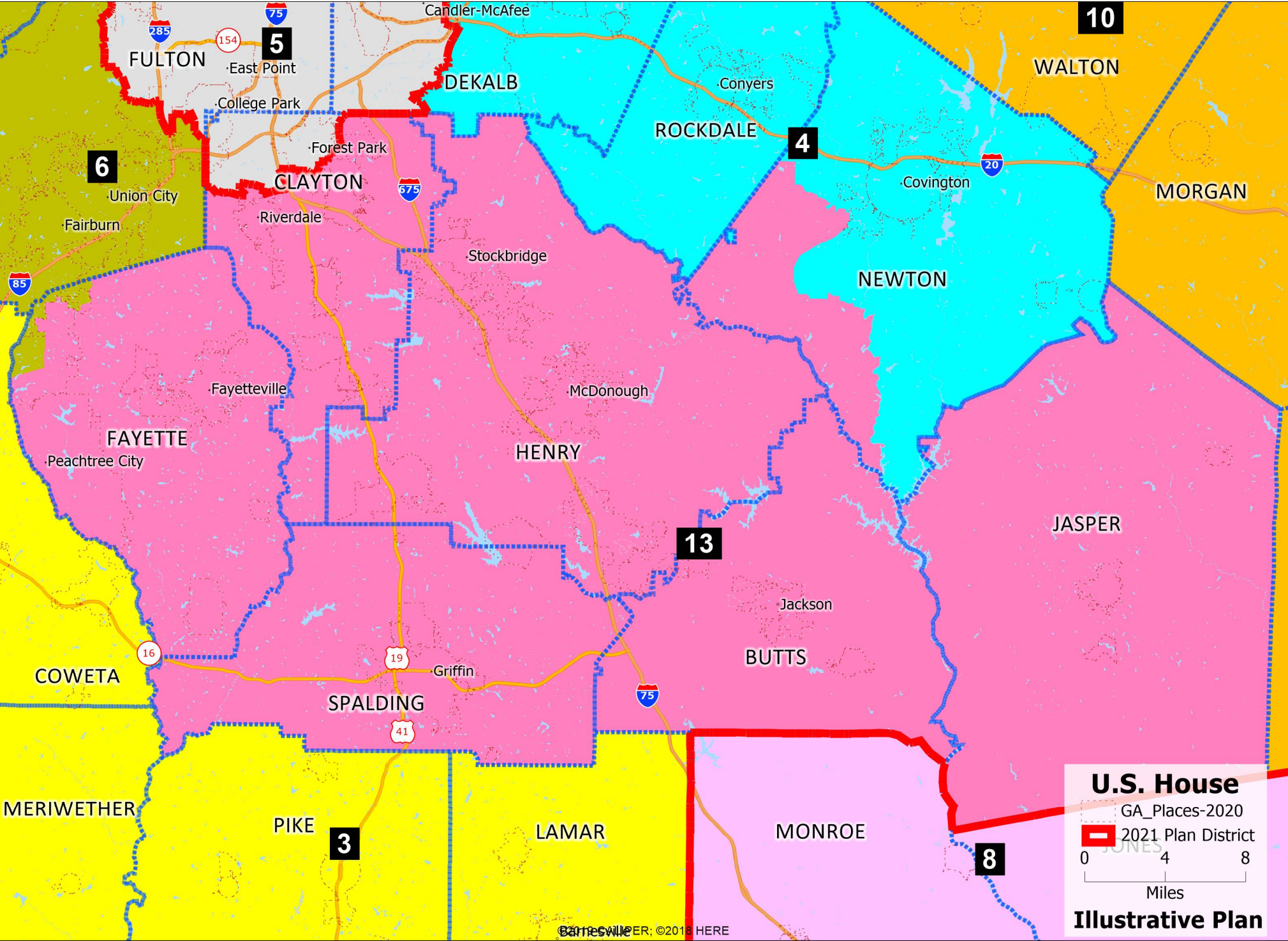


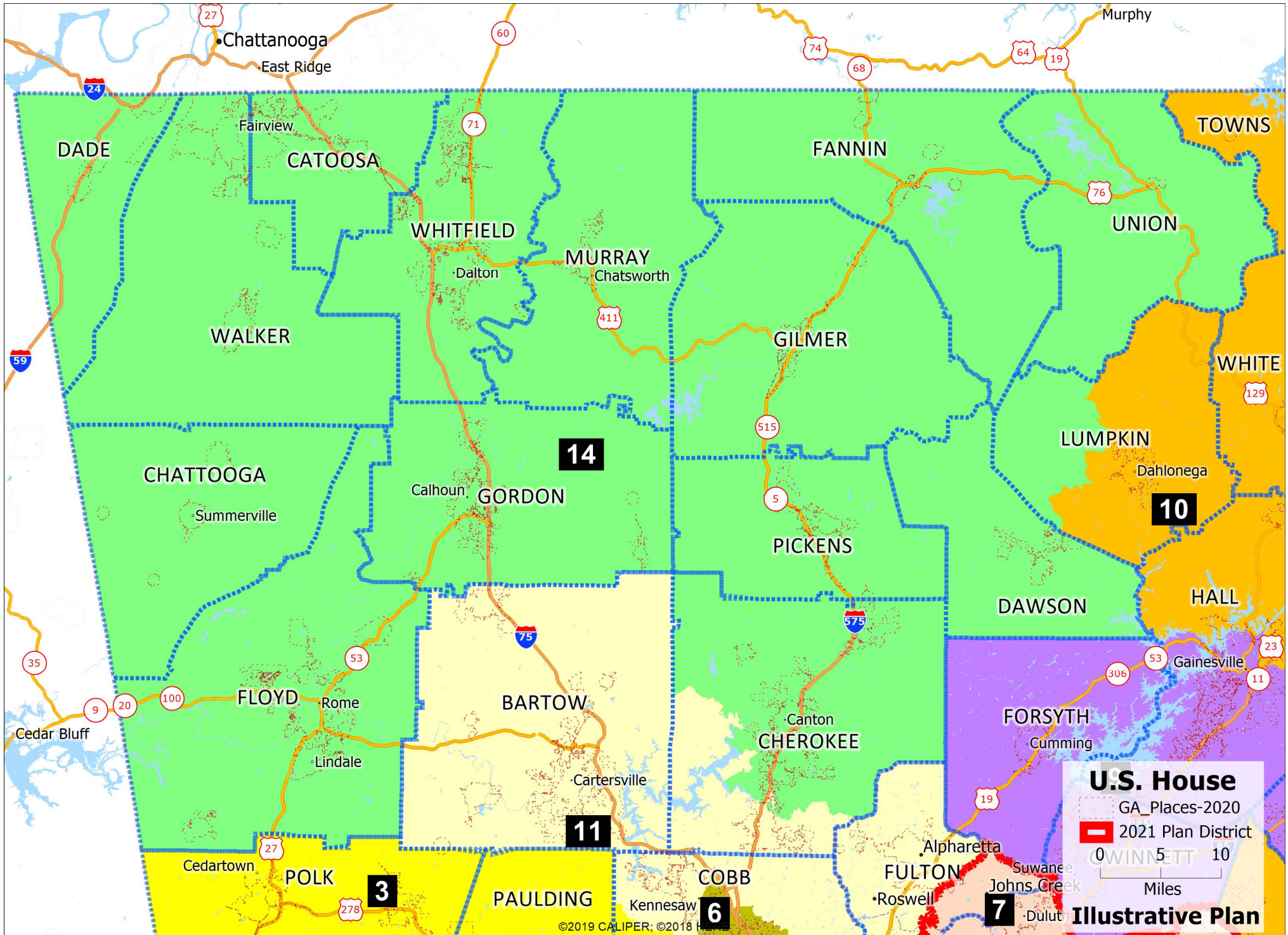












DECLARATION OF WILLIAM S. COOPER:
EXHIBIT I-3

User:

Plan Name: Illustrative Plan

Plan Type:

Plan Components with Population Detail

Monday, November 21, 2022

2:45 PM

	Total Population	NH_Wht	AP_Black	[Hispanic Origin]
District 001				
County: Appling GA				
Total:	18,444	12,674	3,647	1,825
		68.72%	19.77%	9.89%
Voting Age	13,958	10,048	2,540	1,118
		71.99%	18.20%	8.01%
County: Bacon GA				
Total:	11,140	8,103	1,970	875
		72.74%	17.68%	7.85%
Voting Age	8,310	6,374	1,245	547
		76.70%	14.98%	6.58%
County: Brantley GA				
Total:	18,021	16,317	733	326
		90.54%	4.07%	1.81%
Voting Age	13,692	12,522	470	212
		91.45%	3.43%	1.55%
County: Bryan GA				
Total:	44,738	31,321	7,463	3,269
		70.01%	16.68%	7.31%
Voting Age	31,828	23,033	5,025	1,919
		72.37%	15.79%	6.03%
County: Camden GA				
Total:	54,768	37,203	11,072	3,658
		67.93%	20.22%	6.68%
Voting Age	41,808	29,410	7,828	2,457
		70.35%	18.72%	5.88%
County: Charlton GA				
Total:	12,518	7,532	2,798	2,036
		60.17%	22.35%	16.26%
Voting Age	10,135	5,929	2,147	1,971
		58.50%	21.18%	19.45%
County: Chatham GA				
Total:	295,291	139,433	115,458	23,790
		47.22%	39.10%	8.06%
Voting Age	234,715	119,161	85,178	16,551
		50.77%	36.29%	7.05%
County: Effingham GA				
Total:	47,208	35,249	6,652	2,875
		74.67%	14.09%	6.09%
Voting Age	34,272	26,449	4,374	1,700
		77.17%	12.76%	4.96%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 001				
County: Glynn GA				
Total:	84,499	52,987 62.71%	22,098 26.15%	6,336 7.50%
Voting Age	66,468	44,302 66.65%	15,620 23.50%	4,116 6.19%
County: Liberty GA				
Total:	65,256	24,004 36.78%	31,146 47.73%	7,786 11.93%
Voting Age	48,014	19,065 39.71%	21,700 45.20%	5,231 10.89%
County: Long GA				
Total:	16,168	8,774 54.27%	4,734 29.28%	1,979 12.24%
Voting Age	11,234	6,422 57.17%	3,107 27.66%	1,227 10.92%
County: McIntosh GA				
Total:	10,975	7,060 64.33%	3,400 30.98%	231 2.10%
Voting Age	9,040	5,998 66.35%	2,641 29.21%	166 1.84%
County: Pierce GA				
Total:	19,716	16,403 83.20%	1,801 9.13%	998 5.06%
Voting Age	14,899	12,662 84.99%	1,262 8.47%	595 3.99%
County: Ware GA				
Total:	36,251	22,275 61.45%	11,421 31.51%	1,612 4.45%
Voting Age	27,788	17,818 64.12%	8,226 29.60%	1,012 3.64%
County: Wayne GA				
Total:	30,144	21,301 70.66%	6,390 21.20%	1,732 5.75%
Voting Age	23,105	16,754 72.51%	4,662 20.18%	1,116 4.83%
District 001 Total				
Total:	765,137	440,636 57.59%	230,783 30.16%	59,328 7.75%
Voting Age	589,266	355,947 60.41%	166,025 28.17%	39,938 6.78%
District 002				
County: Baker GA				
Total:	2,876	1,514 52.64%	1,178 40.96%	143 4.97%
Voting Age	2,275	1,235 54.29%	932 40.97%	77 3.38%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 002				
County: Bibb GA				
Total:	108,371	29,397 27.13%	72,197 66.62%	4,818 4.45%
Voting Age	82,489	25,121 30.45%	52,370 63.49%	3,351 4.06%
County: Calhoun GA				
Total:	5,573	1,766 31.69%	3,629 65.12%	149 2.67%
Voting Age	4,687	1,567 33.43%	2,998 63.96%	90 1.92%
County: Chattahoochee GA				
Total:	9,565	5,403 56.49%	1,825 19.08%	1,610 16.83%
Voting Age	7,199	4,212 58.51%	1,287 17.88%	1,160 16.11%
County: Clay GA				
Total:	2,848	1,143 40.13%	1,634 57.37%	41 1.44%
Voting Age	2,246	973 43.32%	1,231 54.81%	19 0.85%
County: Crawford GA				
Total:	12,130	8,866 73.09%	2,455 20.24%	415 3.42%
Voting Age	9,606	7,079 73.69%	1,938 20.17%	287 2.99%
County: Decatur GA				
Total:	29,367	14,280 48.63%	12,583 42.85%	1,911 6.51%
Voting Age	22,443	11,586 51.62%	9,189 40.94%	1,196 5.33%
County: Dooly GA				
Total:	11,208	4,611 41.14%	5,652 50.43%	797 7.11%
Voting Age	9,187	4,029 43.86%	4,526 49.27%	493 5.37%
County: Dougherty GA				
Total:	85,790	20,631 24.05%	61,457 71.64%	2,413 2.81%
Voting Age	66,266	17,909 27.03%	45,631 68.86%	1,591 2.40%
County: Early GA				
Total:	10,854	4,813 44.34%	5,688 52.40%	186 1.71%
Voting Age	8,315	3,985 47.93%	4,075 49.01%	113 1.36%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 002				
County: Grady GA				
Total:	26,236	14,715 56.09%	7,693 29.32%	3,273 12.48%
Voting Age	19,962	11,968 59.95%	5,678 28.44%	1,857 9.30%
County: Houston GA				
Total:	48,521	19,375 39.93%	22,637 46.65%	4,663 9.61%
Voting Age	36,233	16,052 44.30%	15,657 43.21%	2,988 8.25%
County: Lee GA				
Total:	33,163	22,758 68.62%	7,755 23.38%	953 2.87%
Voting Age	24,676	17,356 70.34%	5,503 22.30%	603 2.44%
County: Macon GA				
Total:	12,082	4,078 33.75%	7,296 60.39%	472 3.91%
Voting Age	9,938	3,379 34.00%	6,021 60.59%	322 3.24%
County: Marion GA				
Total:	7,498	4,486 59.83%	2,223 29.65%	560 7.47%
Voting Age	5,854	3,643 62.23%	1,687 28.82%	337 5.76%
County: Miller GA				
Total:	6,000	3,949 65.82%	1,831 30.52%	136 2.27%
Voting Age	4,749	3,239 68.20%	1,358 28.60%	92 1.94%
County: Mitchell GA				
Total:	21,755	10,106 46.45%	10,394 47.78%	964 4.43%
Voting Age	17,065	8,284 48.54%	7,917 46.39%	615 3.60%
County: Muscogee GA				
Total:	175,155	58,991 33.68%	95,521 54.54%	13,791 7.87%
Voting Age	132,158	48,043 36.35%	69,548 52.62%	9,099 6.88%
County: Peach GA				
Total:	27,981	12,119 43.31%	12,645 45.19%	2,547 9.10%
Voting Age	22,111	10,071 45.55%	9,720 43.96%	1,788 8.09%

EXHIBIT 1

PT. 2

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 002				
County: Quitman GA				
Total:	2,235	1,190	965	31
		53.24%	43.18%	1.39%
Voting Age	1,870	1,037	765	18
		55.45%	40.91%	0.96%
County: Randolph GA				
Total:	6,425	2,250	3,947	143
		35.02%	61.43%	2.23%
Voting Age	4,977	1,922	2,913	82
		38.62%	58.53%	1.65%
County: Schley GA				
Total:	4,547	3,357	933	175
		73.83%	20.52%	3.85%
Voting Age	3,328	2,520	644	103
		75.72%	19.35%	3.09%
County: Seminole GA				
Total:	9,147	5,617	3,093	228
		61.41%	33.81%	2.49%
Voting Age	7,277	4,681	2,275	160
		64.33%	31.26%	2.20%
County: Stewart GA				
Total:	5,314	1,338	2,538	1,217
		25.18%	47.76%	22.90%
Voting Age	4,617	1,161	2,048	1,196
		25.15%	44.36%	25.90%
County: Sumter GA				
Total:	29,616	11,528	15,546	1,770
		38.92%	52.49%	5.98%
Voting Age	23,036	9,800	11,479	1,147
		42.54%	49.83%	4.98%
County: Talbot GA				
Total:	5,733	2,427	3,145	112
		42.33%	54.86%	1.95%
Voting Age	4,783	2,129	2,537	56
		44.51%	53.04%	1.17%
County: Taylor GA				
Total:	7,816	4,584	2,946	168
		58.65%	37.69%	2.15%
Voting Age	6,120	3,686	2,235	107
		60.23%	36.52%	1.75%
County: Terrell GA				
Total:	9,185	3,189	5,707	177
		34.72%	62.13%	1.93%
Voting Age	7,204	2,709	4,274	121
		37.60%	59.33%	1.68%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 002				
County: Thomas GA				
Total:	45,798	25,994	16,975	1,577
		56.76%	37.06%	3.44%
Voting Age	35,037	20,740	12,332	970
		59.19%	35.20%	2.77%
County: Webster GA				
Total:	2,348	1,136	1,107	59
		48.38%	47.15%	2.51%
Voting Age	1,847	931	844	36
		50.41%	45.70%	1.95%
District 002 Total				
Total:	765,137	305,611	393,195	45,499
		39.94%	51.39%	5.95%
Voting Age	587,555	251,047	289,612	30,074
		42.73%	49.29%	5.12%
District 003				
County: Carroll GA				
Total:	119,148	80,725	24,618	9,586
		67.75%	20.66%	8.05%
Voting Age	90,996	63,803	17,827	6,129
		70.12%	19.59%	6.74%
County: Cobb GA				
Total:	25,421	19,628	2,784	1,371
		77.21%	10.95%	5.39%
Voting Age	18,690	14,828	1,889	872
		79.34%	10.11%	4.67%
County: Coweta GA				
Total:	146,158	99,421	28,289	11,053
		68.02%	19.36%	7.56%
Voting Age	111,155	78,073	20,196	7,384
		70.24%	18.17%	6.64%
County: Haralson GA				
Total:	29,919	26,825	1,541	497
		89.66%	5.15%	1.66%
Voting Age	22,854	20,617	1,106	323
		90.21%	4.84%	1.41%
County: Harris GA				
Total:	34,668	25,925	5,742	1,417
		74.78%	16.56%	4.09%
Voting Age	26,799	20,298	4,431	908
		75.74%	16.53%	3.39%
County: Heard GA				
Total:	11,412	9,589	1,142	253
		84.03%	10.01%	2.22%
Voting Age	8,698	7,407	832	153
		85.16%	9.57%	1.76%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 003				
County: Lamar GA				
Total:	18,500	12,344	5,220	475
		66.72%	28.22%	2.57%
Voting Age	14,541	9,852	4,017	323
		67.75%	27.63%	2.22%
County: Meriwether GA				
Total:	20,613	12,084	7,547	475
		58.62%	36.61%	2.30%
Voting Age	16,526	9,994	5,845	299
		60.47%	35.37%	1.81%
County: Muscogee GA				
Total:	31,767	20,092	6,691	2,722
		63.25%	21.06%	8.57%
Voting Age	24,894	16,592	4,753	1,795
		66.65%	19.09%	7.21%
County: Paulding GA				
Total:	168,661	108,444	41,296	12,564
		64.30%	24.48%	7.45%
Voting Age	123,998	83,066	28,164	7,974
		66.99%	22.71%	6.43%
County: Pike GA				
Total:	18,889	16,313	1,613	348
		86.36%	8.54%	1.84%
Voting Age	14,337	12,422	1,254	207
		86.64%	8.75%	1.44%
County: Polk GA				
Total:	42,853	30,161	5,816	5,585
		70.38%	13.57%	13.03%
Voting Age	32,238	24,049	3,991	3,252
		74.60%	12.38%	10.09%
County: Troup GA				
Total:	69,426	38,099	25,473	2,956
		54.88%	36.69%	4.26%
Voting Age	52,581	30,377	18,202	1,822
		57.77%	34.62%	3.47%
County: Upson GA				
Total:	27,700	18,009	8,324	633
		65.01%	30.05%	2.29%
Voting Age	21,711	14,548	6,202	411
		67.01%	28.57%	1.89%
District 003 Total				
Total:	765,135	517,659	166,096	49,935
		67.66%	21.71%	6.53%
Voting Age	580,018	405,926	118,709	31,852
		69.99%	20.47%	5.49%
District 004				

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 004				
County: DeKalb GA				
Total:	601,451	153,733 25.56%	322,421 53.61%	74,201 12.34%
Voting Age	465,661	129,178 27.74%	247,548 53.16%	50,261 10.79%
County: Newton GA				
Total:	70,115	33,771 48.17%	30,394 43.35%	4,015 5.73%
Voting Age	53,476	27,197 50.86%	22,187 41.49%	2,597 4.86%
County: Rockdale GA				
Total:	93,570	24,500 26.18%	57,204 61.13%	9,540 10.20%
Voting Age	71,503	21,457 30.01%	41,935 58.65%	6,089 8.52%
District 004 Total				
Total:	765,136	212,004 27.71%	410,019 53.59%	87,756 11.47%
Voting Age	590,640	177,832 30.11%	311,670 52.77%	58,947 9.98%
District 005				
County: Clayton GA				
Total:	37,919	2,578 6.80%	27,594 72.77%	6,497 17.13%
Voting Age	27,885	2,344 8.41%	20,301 72.80%	4,185 15.01%
County: DeKalb GA				
Total:	162,931	62,162 38.15%	85,030 52.19%	7,270 4.46%
Voting Age	129,615	50,983 39.33%	66,682 51.45%	5,245 4.05%
County: Fulton GA				
Total:	564,287	209,079 37.05%	280,198 49.66%	42,729 7.57%
Voting Age	464,015	182,325 39.29%	221,288 47.69%	32,002 6.90%
District 005 Total				
Total:	765,137	273,819 35.79%	392,822 51.34%	56,496 7.38%
Voting Age	621,515	235,652 37.92%	308,271 49.60%	41,432 6.67%
District 006				
County: Cobb GA				
Total:	452,386	164,732 36.41%	175,347 38.76%	83,302 18.41%
Voting Age	352,053	141,014 40.05%	131,674 37.40%	55,556 15.78%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 006				
County: Douglas GA				
Total:	144,237	49,877 34.58%	74,260 51.48%	16,035 11.12%
Voting Age	108,428	41,416 38.20%	53,377 49.23%	10,212 9.42%
County: Fayette GA				
Total:	4,143	2,109 50.91%	998 24.09%	891 21.51%
Voting Age	3,000	1,700 56.67%	652 21.73%	543 18.10%
County: Fulton GA				
Total:	164,371	9,267 5.64%	146,286 89.00%	8,173 4.97%
Voting Age	123,766	8,240 6.66%	109,273 88.29%	5,487 4.43%
District 006 Total				
Total:	765,137	225,985 29.54%	396,891 51.87%	108,401 14.17%
Voting Age	587,247	192,370 32.76%	294,976 50.23%	71,798 12.23%
District 007				
County: Fulton GA				
Total:	92,558	45,964 49.66%	11,462 12.38%	6,614 7.15%
Voting Age	69,229	36,341 52.49%	8,135 11.75%	4,468 6.45%
County: Gwinnett GA				
Total:	672,579	179,941 26.75%	228,255 33.94%	175,237 26.05%
Voting Age	497,705	149,497 30.04%	160,936 32.34%	116,136 23.33%
District 007 Total				
Total:	765,137	225,905 29.52%	239,717 31.33%	181,851 23.77%
Voting Age	566,934	185,838 32.78%	169,071 29.82%	120,604 21.27%
District 008				
County: Atkinson GA				
Total:	8,286	4,801 57.94%	1,284 15.50%	2,048 24.72%
Voting Age	6,129	3,787 61.79%	937 15.29%	1,282 20.92%
County: Baldwin GA				
Total:	43,799	22,432 51.22%	18,985 43.35%	1,139 2.60%
Voting Age	35,732	19,377 54.23%	14,515 40.62%	835 2.34%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 008				
County: Ben Hill GA				
Total:	17,194	9,219	6,537	1,054
		53.62%	38.02%	6.13%
Voting Age	13,165	7,459	4,745	653
		56.66%	36.04%	4.96%
County: Berrien GA				
Total:	18,160	14,396	2,198	1,045
		79.27%	12.10%	5.75%
Voting Age	13,690	11,181	1,499	622
		81.67%	10.95%	4.54%
County: Bibb GA				
Total:	48,975	27,390	16,668	1,919
		55.93%	34.03%	3.92%
Voting Age	38,413	22,858	11,900	1,383
		59.51%	30.98%	3.60%
County: Bleckley GA				
Total:	12,583	8,867	2,951	469
		70.47%	23.45%	3.73%
Voting Age	9,613	7,032	2,036	311
		73.15%	21.18%	3.24%
County: Brooks GA				
Total:	16,301	9,066	5,958	955
		55.62%	36.55%	5.86%
Voting Age	12,747	7,483	4,357	635
		58.70%	34.18%	4.98%
County: Clinch GA				
Total:	6,749	4,256	2,096	253
		63.06%	31.06%	3.75%
Voting Age	5,034	3,372	1,406	156
		66.98%	27.93%	3.10%
County: Coffee GA				
Total:	43,092	24,158	12,575	5,430
		56.06%	29.18%	12.60%
Voting Age	32,419	19,146	9,191	3,324
		59.06%	28.35%	10.25%
County: Colquitt GA				
Total:	45,898	25,588	10,648	8,709
		55.75%	23.20%	18.97%
Voting Age	34,193	20,507	7,461	5,467
		59.97%	21.82%	15.99%
County: Cook GA				
Total:	17,229	10,658	5,014	1,134
		61.86%	29.10%	6.58%
Voting Age	12,938	8,310	3,595	704
		64.23%	27.79%	5.44%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 008				
County: Crisp GA				
Total:	20,128	9,892	9,194	634
		49.15%	45.68%	3.15%
Voting Age	15,570	8,248	6,603	414
		52.97%	42.41%	2.66%
County: Dodge GA				
Total:	19,925	12,865	6,148	620
		64.57%	30.86%	3.11%
Voting Age	15,709	10,360	4,725	406
		65.95%	30.08%	2.58%
County: Echols GA				
Total:	3,697	2,328	193	1,091
		62.97%	5.22%	29.51%
Voting Age	2,709	1,856	121	667
		68.51%	4.47%	24.62%
County: Houston GA				
Total:	115,112	66,836	33,883	7,144
		58.06%	29.43%	6.21%
Voting Age	85,885	51,966	23,948	4,542
		60.51%	27.88%	5.29%
County: Irwin GA				
Total:	9,666	6,402	2,333	663
		66.23%	24.14%	6.86%
Voting Age	7,547	5,047	1,720	545
		66.87%	22.79%	7.22%
County: Jeff Davis GA				
Total:	14,779	9,950	2,493	2,047
		67.33%	16.87%	13.85%
Voting Age	10,856	7,643	1,752	1,233
		70.40%	16.14%	11.36%
County: Jones GA				
Total:	28,347	20,074	7,114	476
		70.82%	25.10%	1.68%
Voting Age	21,575	15,428	5,341	302
		71.51%	24.76%	1.40%
County: Lanier GA				
Total:	9,877	6,595	2,369	572
		66.77%	23.99%	5.79%
Voting Age	7,326	5,010	1,683	370
		68.39%	22.97%	5.05%
County: Lowndes GA				
Total:	118,251	59,306	46,758	7,872
		50.15%	39.54%	6.66%
Voting Age	89,031	47,140	33,302	5,201
		52.95%	37.40%	5.84%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 008				
County: Monroe GA				
Total:	27,957	19,954 71.37%	6,444 23.05%	714 2.55%
Voting Age	21,913	15,771 71.97%	5,068 23.13%	464 2.12%
County: Pulaski GA				
Total:	9,855	6,022 61.11%	3,250 32.98%	327 3.32%
Voting Age	8,012	5,027 62.74%	2,564 32.00%	224 2.80%
County: Telfair GA				
Total:	12,477	5,970 47.85%	4,754 38.10%	1,928 15.45%
Voting Age	10,190	4,802 47.12%	3,806 37.35%	1,757 17.24%
County: Tift GA				
Total:	41,344	22,189 53.67%	12,734 30.80%	5,219 12.62%
Voting Age	31,224	18,011 57.68%	8,963 28.71%	3,295 10.55%
County: Turner GA				
Total:	9,006	4,700 52.19%	3,813 42.34%	372 4.13%
Voting Age	6,960	3,891 55.91%	2,752 39.54%	256 3.68%
County: Twiggs GA				
Total:	8,022	4,487 55.93%	3,226 40.21%	124 1.55%
Voting Age	6,589	3,733 56.66%	2,627 39.87%	79 1.20%
County: Wilcox GA				
Total:	8,766	5,185 59.15%	3,161 36.06%	272 3.10%
Voting Age	7,218	4,215 58.40%	2,693 37.31%	209 2.90%
County: Wilkinson GA				
Total:	8,877	5,110 57.56%	3,330 37.51%	239 2.69%
Voting Age	7,026	4,165 59.28%	2,549 36.28%	152 2.16%
County: Worth GA				
Total:	20,784	14,427 69.41%	5,517 26.54%	381 1.83%
Voting Age	16,444	11,747 71.44%	4,108 24.98%	244 1.48%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Black	[Hispanic Origin]
District 008				
District 008 Total				
Total:	765,136	443,123 57.91%	241,628 31.58%	54,850 7.17%
Voting Age	585,857	354,572 60.52%	175,967 30.04%	35,732 6.10%
District 009				
County: Forsyth GA				
Total:	251,283	159,407 63.44%	13,222 5.26%	25,226 10.04%
Voting Age	181,193	122,017 67.34%	8,751 4.83%	16,204 8.94%
County: Gwinnett GA				
Total:	284,483	130,642 45.92%	59,432 20.89%	45,223 15.90%
Voting Age	211,779	102,544 48.42%	41,826 19.75%	30,523 14.41%
County: Hall GA				
Total:	153,463	80,227 52.28%	15,257 9.94%	51,232 33.38%
Voting Age	114,821	66,144 57.61%	10,945 9.53%	32,465 28.27%
County: Jackson GA				
Total:	75,907	59,064 77.81%	6,148 8.10%	6,712 8.84%
Voting Age	56,451	45,015 79.74%	4,268 7.56%	4,261 7.55%
District 009 Total				
Total:	765,136	429,340 56.11%	94,059 12.29%	128,393 16.78%
Voting Age	564,244	335,720 59.50%	65,790 11.66%	83,453 14.79%
District 010				
County: Banks GA				
Total:	18,035	15,578 86.38%	589 3.27%	1,164 6.45%
Voting Age	13,900	12,278 88.33%	365 2.63%	721 5.19%
County: Barrow GA				
Total:	83,505	55,582 66.56%	11,907 14.26%	10,560 12.65%
Voting Age	62,195	43,241 69.52%	8,222 13.22%	6,726 10.81%
County: Clarke GA				
Total:	128,671	72,201 56.11%	33,672 26.17%	14,336 11.14%
Voting Age	106,830	64,531 60.41%	24,776 23.19%	10,213 9.56%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 010				
County: Elbert GA				
Total:	19,637	12,610	5,520	996
		64.22%	28.11%	5.07%
Voting Age	15,493	10,322	4,122	660
		66.62%	26.61%	4.26%
County: Franklin GA				
Total:	23,424	19,262	2,207	1,121
		82.23%	9.42%	4.79%
Voting Age	18,307	15,466	1,523	678
		84.48%	8.32%	3.70%
County: Greene GA				
Total:	18,915	11,126	6,027	1,289
		58.82%	31.86%	6.81%
Voting Age	15,358	9,675	4,470	826
		63.00%	29.11%	5.38%
County: Habersham GA				
Total:	46,031	34,694	2,165	6,880
		75.37%	4.70%	14.95%
Voting Age	35,878	28,299	1,675	4,115
		78.88%	4.67%	11.47%
County: Hall GA				
Total:	49,673	40,191	1,749	5,778
		80.91%	3.52%	11.63%
Voting Age	39,023	32,656	1,149	3,681
		83.68%	2.94%	9.43%
County: Hancock GA				
Total:	8,735	2,413	6,131	63
		27.62%	70.19%	0.72%
Voting Age	7,487	2,220	5,108	47
		29.65%	68.22%	0.63%
County: Hart GA				
Total:	25,828	19,250	4,732	931
		74.53%	18.32%	3.60%
Voting Age	20,436	15,761	3,447	578
		77.12%	16.87%	2.83%
County: Lumpkin GA				
Total:	29,598	25,718	643	1,654
		86.89%	2.17%	5.59%
Voting Age	24,614	21,601	482	1,247
		87.76%	1.96%	5.07%
County: Madison GA				
Total:	30,120	23,549	3,196	1,956
		78.18%	10.61%	6.49%
Voting Age	23,112	18,643	2,225	1,198
		80.66%	9.63%	5.18%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 010				
County: Morgan GA				
Total:	20,097	14,487 72.09%	4,339 21.59%	712 3.54%
Voting Age	15,574	11,452 73.53%	3,280 21.06%	434 2.79%
County: Oconee GA				
Total:	41,799	33,886 81.07%	2,280 5.45%	2,347 5.61%
Voting Age	30,221	24,942 82.53%	1,660 5.49%	1,405 4.65%
County: Oglethorpe GA				
Total:	14,825	10,903 73.54%	2,468 16.65%	869 5.86%
Voting Age	11,639	8,799 75.60%	1,853 15.92%	531 4.56%
County: Putnam GA				
Total:	22,047	14,316 64.93%	5,701 25.86%	1,557 7.06%
Voting Age	17,847	12,209 68.41%	4,229 23.70%	1,031 5.78%
County: Rabun GA				
Total:	16,883	14,625 86.63%	210 1.24%	1,452 8.60%
Voting Age	13,767	12,236 88.88%	129 0.94%	928 6.74%
County: Stephens GA				
Total:	26,784	21,323 79.61%	3,527 13.17%	857 3.20%
Voting Age	21,163	17,310 81.79%	2,467 11.66%	578 2.73%
County: Taliaferro GA				
Total:	1,559	591 37.91%	876 56.19%	69 4.43%
Voting Age	1,289	506 39.26%	722 56.01%	46 3.57%
County: Towns GA				
Total:	12,493	11,469 91.80%	168 1.34%	415 3.32%
Voting Age	10,923	10,100 92.47%	137 1.25%	338 3.09%
County: Walton GA				
Total:	96,673	68,499 70.86%	18,804 19.45%	5,228 5.41%
Voting Age	73,098	53,647 73.39%	13,165 18.01%	3,236 4.43%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 010				
County: White GA				
Total:	28,003	24,959	721	913
		89.13%	2.57%	3.26%
Voting Age	22,482	20,318	484	605
		90.37%	2.15%	2.69%
County: Wilkes GA				
Total:	1,802	1,080	567	97
		59.93%	31.47%	5.38%
Voting Age	1,491	897	488	54
		60.16%	32.73%	3.62%
District 010 Total				
Total:	765,137	548,312	118,199	61,244
		71.66%	15.45%	8.00%
Voting Age	602,127	447,109	86,178	39,876
		74.25%	14.31%	6.62%
District 011				
County: Bartow GA				
Total:	108,901	80,159	13,395	10,751
		73.61%	12.30%	9.87%
Voting Age	83,570	63,759	9,377	6,817
		76.29%	11.22%	8.16%
County: Cherokee GA				
Total:	122,400	86,657	12,310	15,362
		70.80%	10.06%	12.55%
Voting Age	93,948	69,068	8,613	10,317
		73.52%	9.17%	10.98%
County: Cobb GA				
Total:	288,342	184,822	44,985	26,567
		64.10%	15.60%	9.21%
Voting Age	221,105	147,458	32,578	18,077
		66.69%	14.73%	8.18%
County: Fulton GA				
Total:	245,494	140,483	39,678	28,786
		57.22%	16.16%	11.73%
Voting Age	190,172	113,635	29,939	19,957
		59.75%	15.74%	10.49%
District 011 Total				
Total:	765,137	492,121	110,368	81,466
		64.32%	14.42%	10.65%
Voting Age	588,795	393,920	80,507	55,168
		66.90%	13.67%	9.37%
District 012				
County: Bulloch GA				
Total:	81,099	49,712	24,375	4,180
		61.30%	30.06%	5.15%
Voting Age	64,494	41,041	18,220	3,021
		63.64%	28.25%	4.68%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 012				
County: Burke GA				
Total:	24,596	11,941	11,430	777
		48.55%	46.47%	3.16%
Voting Age	18,778	9,566	8,362	494
		50.94%	44.53%	2.63%
County: Candler GA				
Total:	10,981	6,567	2,807	1,378
		59.80%	25.56%	12.55%
Voting Age	8,241	5,229	2,009	835
		63.45%	24.38%	10.13%
County: Columbia GA				
Total:	156,010	99,111	32,516	11,858
		63.53%	20.84%	7.60%
Voting Age	114,823	76,070	22,273	7,355
		66.25%	19.40%	6.41%
County: Effingham GA				
Total:	17,561	12,955	3,383	617
		73.77%	19.26%	3.51%
Voting Age	13,023	9,788	2,457	354
		75.16%	18.87%	2.72%
County: Emanuel GA				
Total:	22,768	13,815	7,556	993
		60.68%	33.19%	4.36%
Voting Age	17,320	11,013	5,404	589
		63.59%	31.20%	3.40%
County: Evans GA				
Total:	10,774	6,038	3,273	1,237
		56.04%	30.38%	11.48%
Voting Age	8,127	4,826	2,410	731
		59.38%	29.65%	8.99%
County: Glascock GA				
Total:	2,884	2,573	226	52
		89.22%	7.84%	1.80%
Voting Age	2,236	2,003	167	31
		89.58%	7.47%	1.39%
County: Jefferson GA				
Total:	15,709	6,834	8,208	462
		43.50%	52.25%	2.94%
Voting Age	12,301	5,536	6,324	280
		45.00%	51.41%	2.28%
County: Jenkins GA				
Total:	8,674	4,611	3,638	303
		53.16%	41.94%	3.49%
Voting Age	7,005	3,874	2,843	194
		55.30%	40.59%	2.77%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 012				
County: Johnson GA				
Total:	9,189	5,800	3,124	117
		63.12%	34.00%	1.27%
Voting Age	7,474	4,790	2,513	82
		64.09%	33.62%	1.10%
County: Laurens GA				
Total:	49,570	27,881	19,132	1,424
		56.25%	38.60%	2.87%
Voting Age	37,734	22,229	13,695	923
		58.91%	36.29%	2.45%
County: Lincoln GA				
Total:	7,690	5,196	2,212	92
		67.57%	28.76%	1.20%
Voting Age	6,270	4,316	1,728	54
		68.84%	27.56%	0.86%
County: McDuffie GA				
Total:	21,632	11,417	9,045	790
		52.78%	41.81%	3.65%
Voting Age	16,615	9,359	6,425	536
		56.33%	38.67%	3.23%
County: Montgomery GA				
Total:	8,610	5,665	2,224	571
		65.80%	25.83%	6.63%
Voting Age	6,792	4,527	1,781	377
		66.65%	26.22%	5.55%
County: Richmond GA				
Total:	206,607	68,397	119,970	11,449
		33.10%	58.07%	5.54%
Voting Age	160,899	58,403	87,930	8,445
		36.30%	54.65%	5.25%
County: Screven GA				
Total:	14,067	8,018	5,527	287
		57.00%	39.29%	2.04%
Voting Age	10,893	6,387	4,144	188
		58.63%	38.04%	1.73%
County: Tattnall GA				
Total:	22,842	13,825	6,331	2,303
		60.52%	27.72%	10.08%
Voting Age	17,654	11,020	4,886	1,419
		62.42%	27.68%	8.04%
County: Toombs GA				
Total:	27,030	16,007	7,402	3,044
		59.22%	27.38%	11.26%
Voting Age	20,261	12,810	5,036	1,978
		63.22%	24.86%	9.76%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 012				
County: Treutlen GA				
Total:	6,406	4,065 63.46%	2,114 33.00%	170 2.65%
Voting Age	4,934	3,272 66.32%	1,514 30.69%	98 1.99%
County: Warren GA				
Total:	5,215	1,974 37.85%	3,128 59.98%	53 1.02%
Voting Age	4,159	1,716 41.26%	2,360 56.74%	46 1.11%
County: Washington GA				
Total:	19,988	8,412 42.09%	10,969 54.88%	334 1.67%
Voting Age	15,709	6,944 44.20%	8,333 53.05%	235 1.50%
County: Wheeler GA				
Total:	7,471	4,157 55.64%	2,949 39.47%	272 3.64%
Voting Age	6,217	3,418 54.98%	2,561 41.19%	174 2.80%
County: Wilkes GA				
Total:	7,763	3,872 49.88%	3,422 44.08%	302 3.89%
Voting Age	6,160	3,257 52.87%	2,583 41.93%	189 3.07%
District 012 Total				
Total:	765,136	398,843 52.13%	294,961 38.55%	43,065 5.63%
Voting Age	588,119	321,394 54.65%	215,958 36.72%	28,628 4.87%
District 013				
County: Butts GA				
Total:	25,434	16,628 65.38%	7,212 28.36%	803 3.16%
Voting Age	20,360	13,510 66.36%	5,660 27.80%	559 2.75%
County: Clayton GA				
Total:	259,676	23,324 8.98%	188,757 72.69%	36,049 13.88%
Voting Age	192,693	21,052 10.93%	138,553 71.90%	23,193 12.04%
County: Fayette GA				
Total:	115,051	66,035 57.40%	31,078 27.01%	8,589 7.47%
Voting Age	88,798	53,402 60.14%	23,076 25.99%	5,625 6.33%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 013				
County: Henry GA				
Total:	240,712	86,297 35.85%	125,211 52.02%	18,437 7.66%
Voting Age	179,973	69,744 38.75%	89,657 49.82%	12,030 6.68%
County: Jasper GA				
Total:	14,588	10,771 73.83%	2,676 18.34%	684 4.69%
Voting Age	11,118	8,400 75.55%	1,966 17.68%	402 3.62%
County: Newton GA				
Total:	42,368	12,975 30.62%	25,507 60.20%	3,149 7.43%
Voting Age	31,272	10,434 33.37%	18,246 58.35%	1,964 6.28%
County: Spalding GA				
Total:	67,306	37,105 55.13%	24,522 36.43%	3,666 5.45%
Voting Age	52,123	30,612 58.73%	17,511 33.60%	2,377 4.56%
District 013 Total				
Total:	765,135	253,135 33.08%	404,963 52.93%	71,377 9.33%
Voting Age	576,337	207,154 35.94%	294,669 51.13%	46,150 8.01%
District 014				
County: Catoosa GA				
Total:	67,872	59,280 87.34%	2,642 3.89%	2,341 3.45%
Voting Age	52,448	46,578 88.81%	1,684 3.21%	1,492 2.84%
County: Chattooga GA				
Total:	24,965	20,079 80.43%	2,865 11.48%	1,297 5.20%
Voting Age	19,416	15,885 81.81%	2,235 11.51%	733 3.78%
County: Cherokee GA				
Total:	144,220	111,210 77.11%	9,377 6.50%	16,749 11.61%
Voting Age	108,980	87,087 79.91%	6,363 5.84%	10,598 9.72%
County: Dade GA				
Total:	16,251	14,786 90.99%	228 1.40%	364 2.24%
Voting Age	12,987	11,925 91.82%	140 1.08%	243 1.87%

Plan Components with Population Detail

Nov14_GA_congress

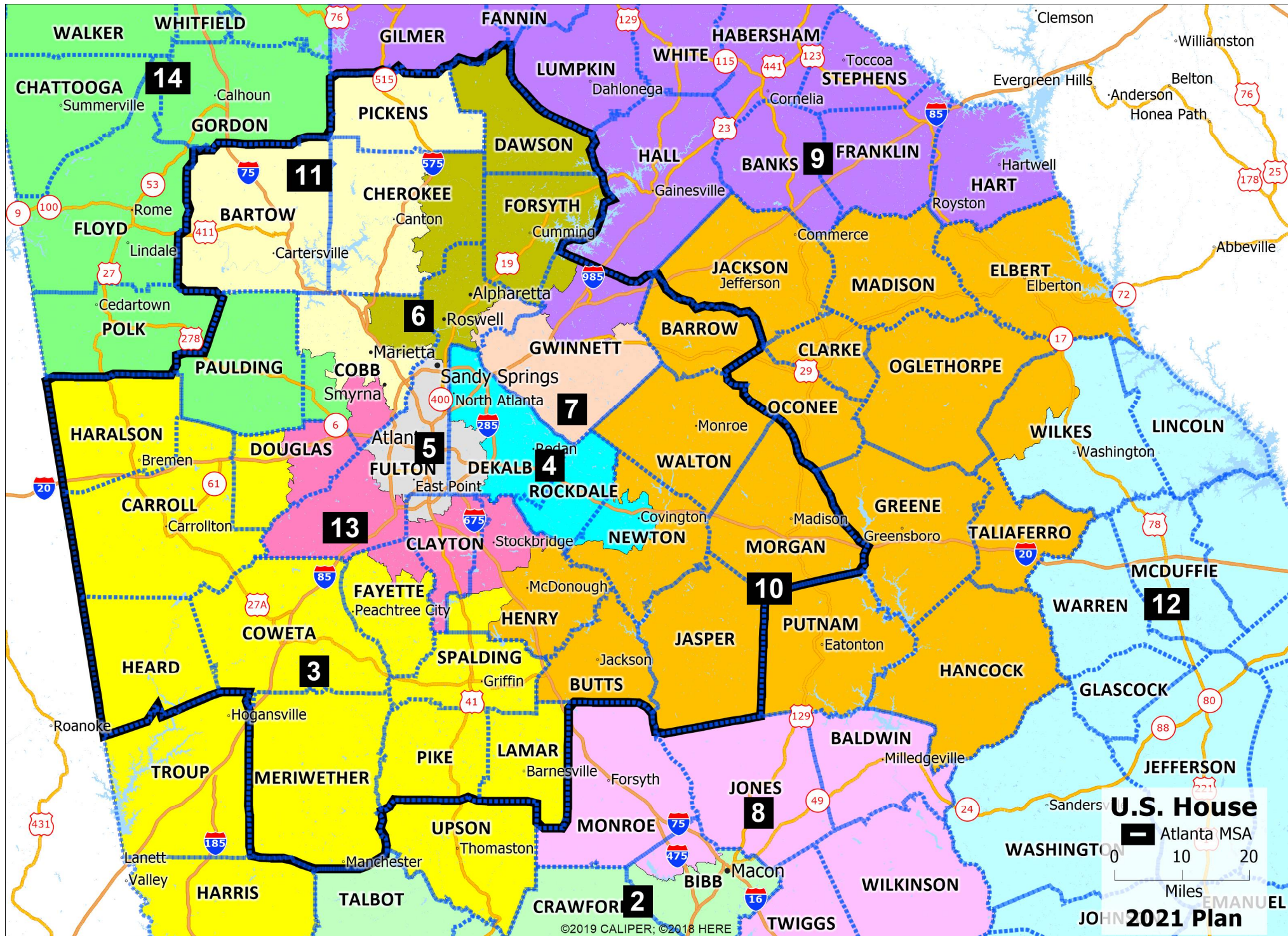
	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 014				
County: Dawson GA				
Total:	26,798	23,544	392	1,605
		87.86%	1.46%	5.99%
Voting Age	21,441	19,183	249	1,047
		89.47%	1.16%	4.88%
County: Fannin GA				
Total:	25,319	23,351	199	753
		92.23%	0.79%	2.97%
Voting Age	21,188	19,721	133	505
		93.08%	0.63%	2.38%
County: Floyd GA				
Total:	98,584	67,747	15,606	11,466
		68.72%	15.83%	11.63%
Voting Age	76,295	55,088	11,064	7,167
		72.20%	14.50%	9.39%
County: Gilmer GA				
Total:	31,353	26,365	296	3,599
		84.09%	0.94%	11.48%
Voting Age	25,417	22,187	161	2,158
		87.29%	0.63%	8.49%
County: Gordon GA				
Total:	57,544	43,317	2,919	8,957
		75.28%	5.07%	15.57%
Voting Age	43,500	34,084	1,939	5,592
		78.35%	4.46%	12.86%
County: Lumpkin GA				
Total:	3,890	3,523	42	136
		90.57%	1.08%	3.50%
Voting Age	3,075	2,818	25	98
		91.64%	0.81%	3.19%
County: Murray GA				
Total:	39,973	32,164	556	5,914
		80.46%	1.39%	14.79%
Voting Age	30,210	25,146	321	3,696
		83.24%	1.06%	12.23%
County: Pickens GA				
Total:	33,216	30,122	512	1,198
		90.69%	1.54%	3.61%
Voting Age	26,799	24,626	319	755
		91.89%	1.19%	2.82%
County: Union GA				
Total:	24,632	22,646	228	816
		91.94%	0.93%	3.31%
Voting Age	20,808	19,351	147	563
		93.00%	0.71%	2.71%

Plan Components with Population Detail

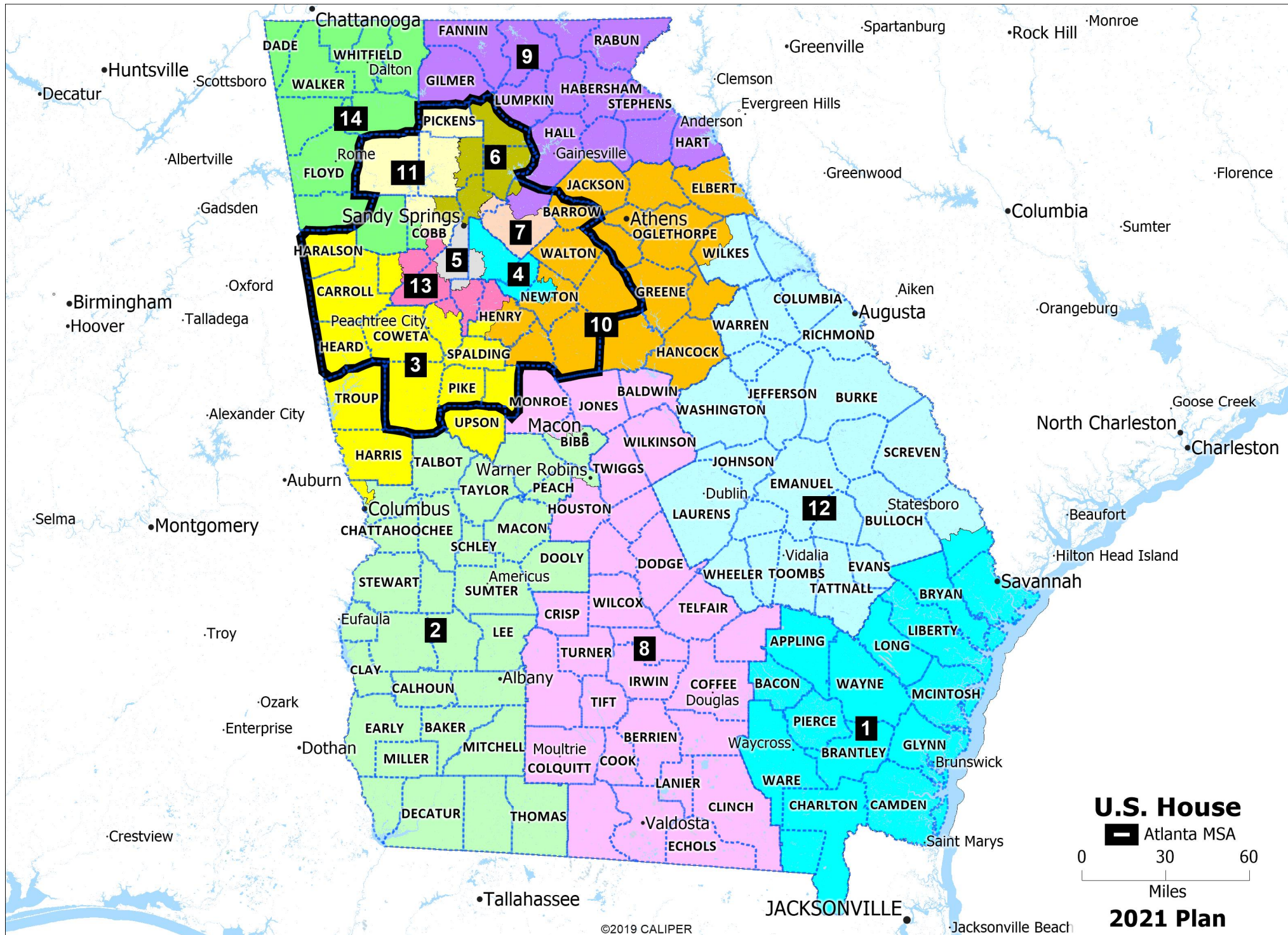
Nov14_GA_congress

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 014				
County: Walker GA				
Total:	67,654	59,654	3,664	1,685
		88.18%	5.42%	2.49%
Voting Age	52,794	47,292	2,454	1,066
		89.58%	4.65%	2.02%
County: Whitfield GA				
Total:	102,864	57,875	4,919	36,916
		56.26%	4.78%	35.89%
Voting Age	76,262	46,881	3,349	23,553
		61.47%	4.39%	30.88%
District 014 Total				
Total:	765,135	595,663	44,445	93,796
		77.85%	5.81%	12.26%
Voting Age	591,620	477,852	30,583	59,266
		80.77%	5.17%	10.02%

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT J-1



DECLARATION OF WILLIAM S. COOPER:
EXHIBIT J-2



DECLARATION OF WILLIAM S. COOPER:
EXHIBIT K-1

Population Summary Report

Georgia U.S. House -- 2020 Census -- Enacted Plan

District	Population	Deviation	% Deviation	AP Black	% AP Black	Latino	% Latino	NH White	% NH White
001	765137	1	0.00%	230783	30.16%	59328	7.75%	440636	57.59%
002	765137	1	0.00%	393195	51.39%	45499	5.95%	305611	39.94%
003	765136	0	0.00%	188947	24.69%	48285	6.31%	492494	64.37%
004	765135	-1	0.00%	423763	55.38%	88947	11.63%	197536	25.82%
005	765137	1	0.00%	392822	51.34%	56496	7.38%	273819	35.79%
006	765136	0	0.00%	78871	10.31%	78299	10.23%	487400	63.70%
007	765137	1	0.00%	239717	31.33%	181851	23.77%	225905	29.52%
008	765136	0	0.00%	241628	31.58%	54850	7.17%	443123	57.91%
009	765137	1	0.00%	87130	11.39%	117758	15.39%	495078	64.70%
010	765135	-1	0.00%	184137	24.07%	58645	7.66%	486487	63.58%
011	765137	1	0.00%	143404	18.74%	99794	13.04%	469264	61.33%
012	765136	0	0.00%	294961	38.55%	43065	5.63%	398843	52.13%
013	765137	1	0.00%	520094	67.97%	93554	12.23%	125106	16.35%
014	765135	-1	0.00%	118694	15.51%	97086	12.69%	520854	68.07%
Total	10711908		0.00%	3538146	33.03%	1123457	10.49%	5362156	50.06%

District	18+ Pop	18+ SR Black	% 18+ SR Black	18+ AP Black	% 18+ AP Black	18+ Latino	% 18+ Latino	18+ NH White	% 18+ NH White
001	589266	157770	26.77%	166025	28.17%	39938	6.78%	440636	57.59%
002	587555	281564	47.92%	289612	49.29%	30074	5.12%	305611	39.94%
003	586319	130099	22.19%	136708	23.32%	31274	5.33%	492494	64.37%
004	589470	308266	52.30%	321379	54.52%	59670	10.12%	197536	25.82%
005	621515	295885	47.61%	308271	49.60%	41432	6.67%	273819	35.79%
006	574797	50334	8.76%	56969	9.91%	52353	9.11%	487400	63.70%
007	566934	157650	27.81%	169071	29.82%	120604	21.27%	225905	29.52%
008	585857	170421	29.09%	175967	30.04%	35732	6.10%	443123	57.91%
009	592520	56416	9.52%	61747	10.42%	76361	12.89%	495078	64.70%
010	588874	126798	21.53%	133097	22.60%	38336	6.51%	486487	63.58%
011	595201	98212	16.50%	106811	17.95%	66802	11.22%	469264	61.33%
012	588119	207872	35.35%	215958	36.72%	28628	4.87%	398843	52.13%
013	574789	370024	64.38%	383663	66.75%	60467	10.52%	125106	16.35%
014	579058	77108	13.32%	82708	14.28%	61247	10.58%	520854	68.07%
Total	8220274	2488419	30.27%	2607986	31.73%	742918	9.04%	5362156	65.23%

District	% NH Single-Race Black CVAP*	% NH DOJ Black CVAP**	% Latino CVAP	% SR NH White CVAP
001	29.16%	29.67%	4.49%	63.10%
002	49.55%	50.001%	3.17%	44.62%
003	22.53%	22.86%	3.38%	71.12%
004	57.71%	58.46%	3.98%	32.82%
005	51.64%	52.35%	3.48%	39.75%
006	9.72%	10.26%	5.63%	76.60%
007	31.88%	32.44%	11.20%	43.69%
008	30.46%	30.76%	3.79%	63.40%
009	10.03%	10.34%	7.35%	77.37%
010	22.11%	22.56%	4.06%	70.80%
011	17.57%	18.30%	6.28%	71.12%
012	36.60%	37.19%	3.39%	56.94%
013	66.36%	67.05%	5.80%	23.21%
014	13.19%	13.71%	6.20%	78.21%

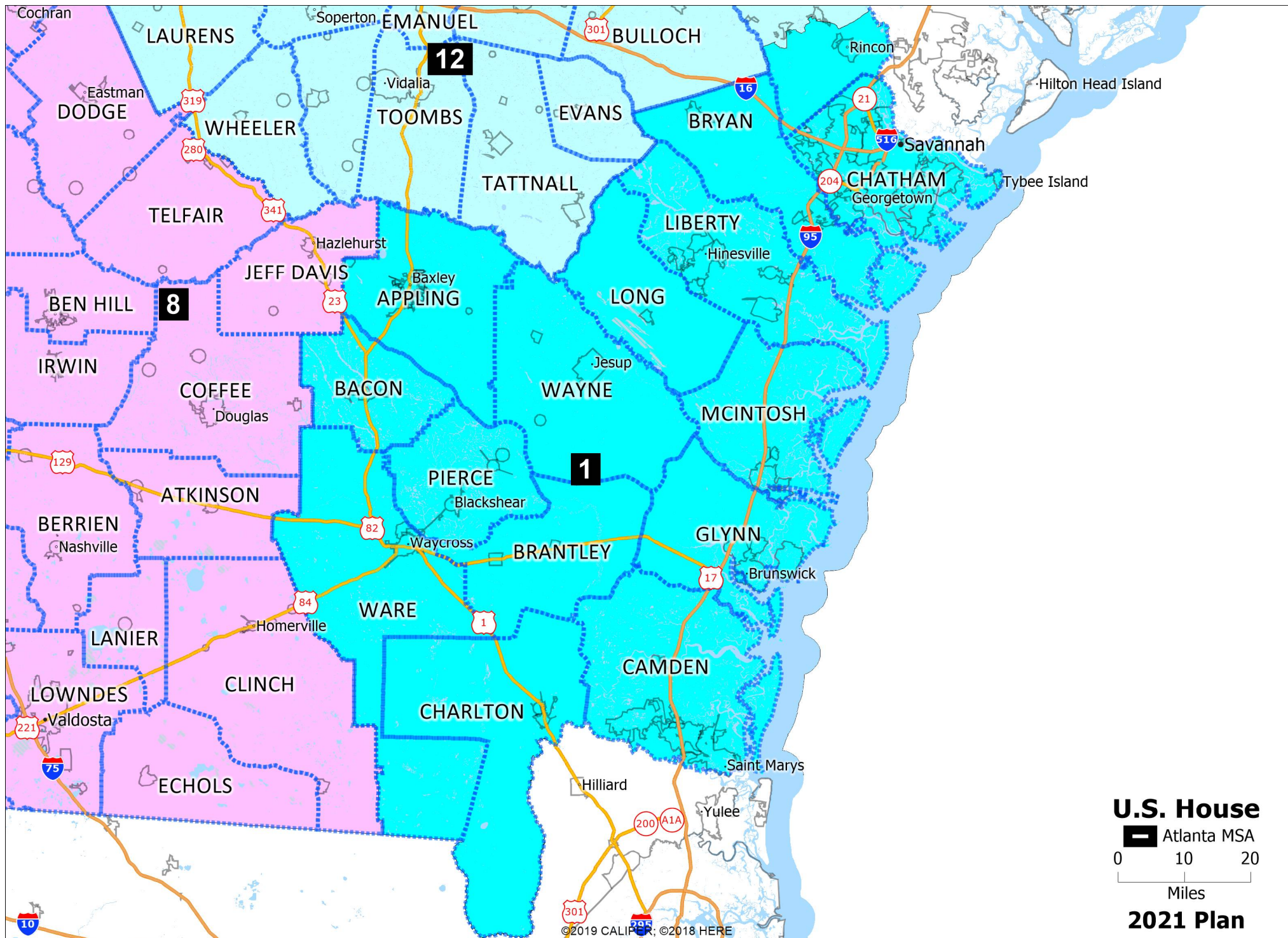
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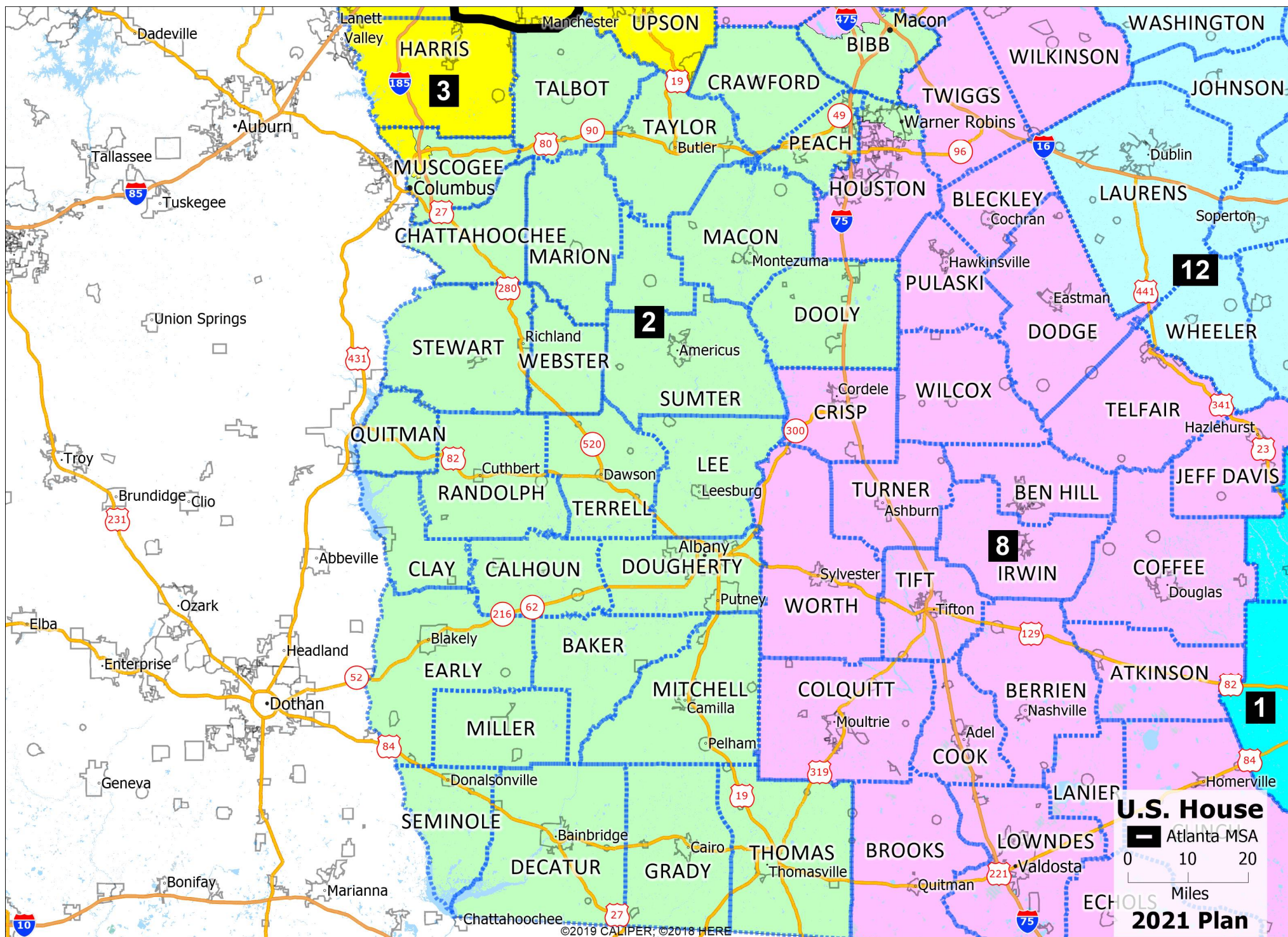
* 2016-20 ACS Special Tabulation <https://redistrictingdatahub.org/dataset/georgia-cvap-data-disaggregated-to-the-block-level-2020/>

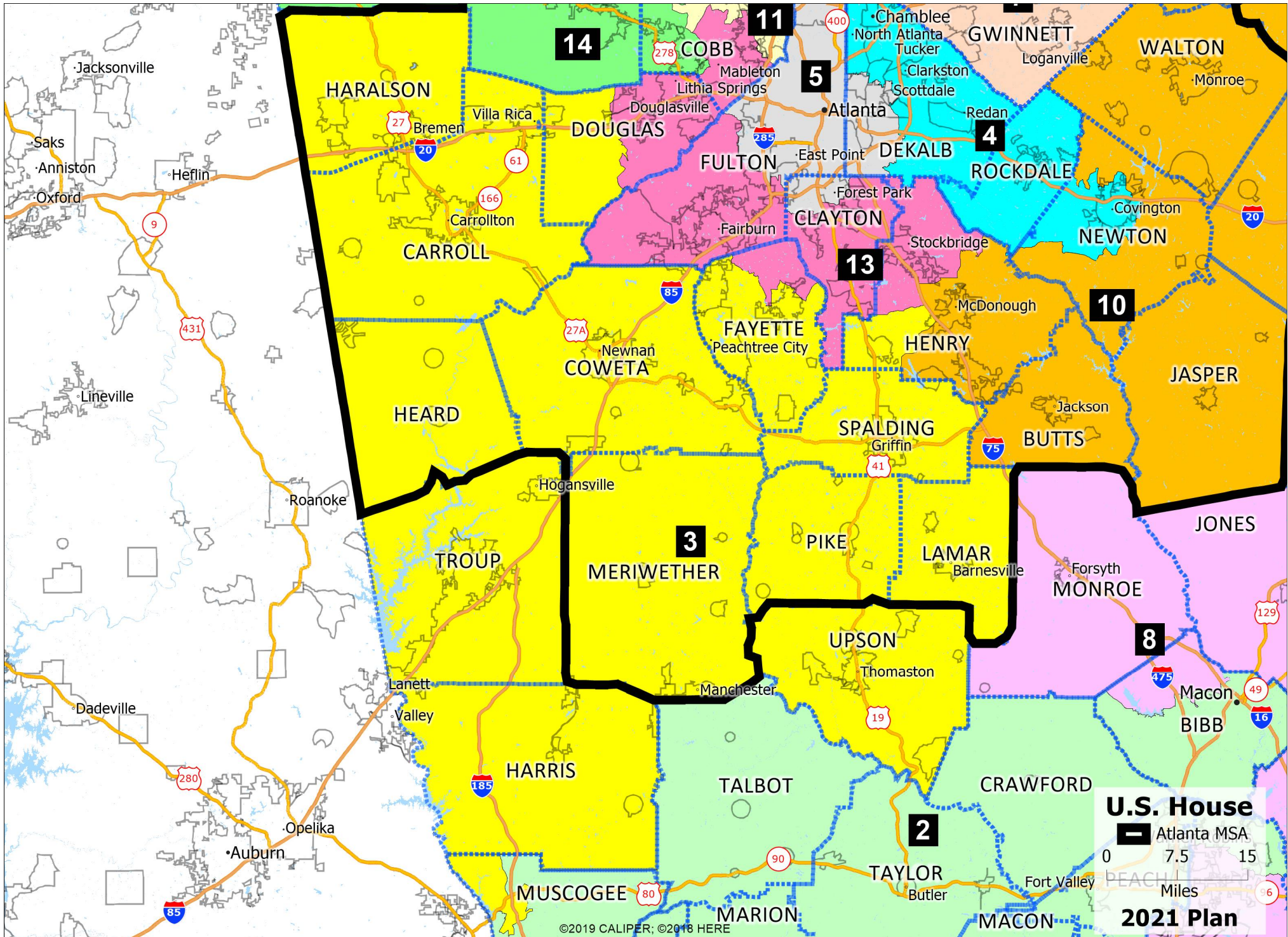
Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates

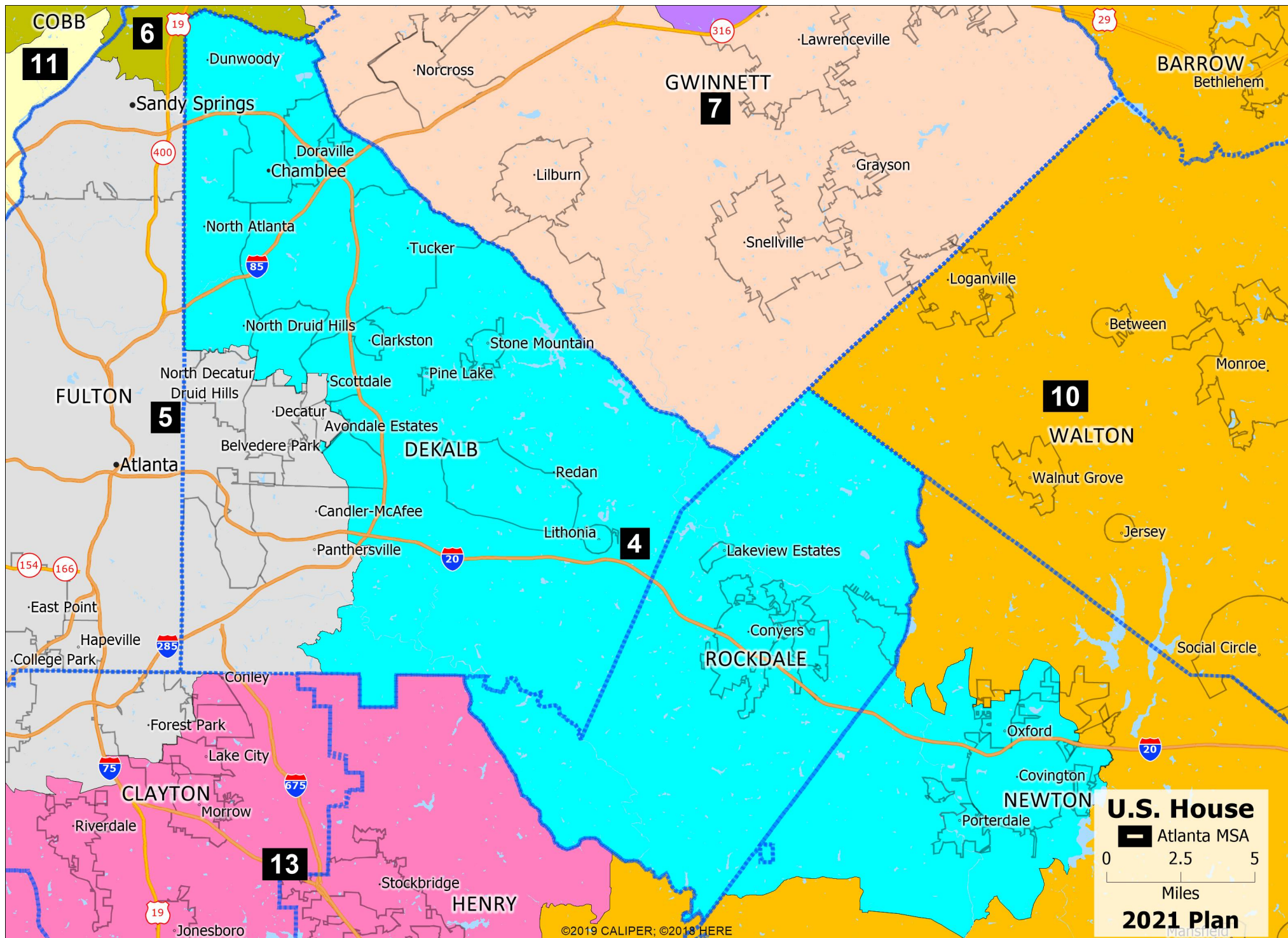
* Single race NH Black CVAP, **NH DOJ Black= SR NH Black CVAP+SR NH Black/White CVAP

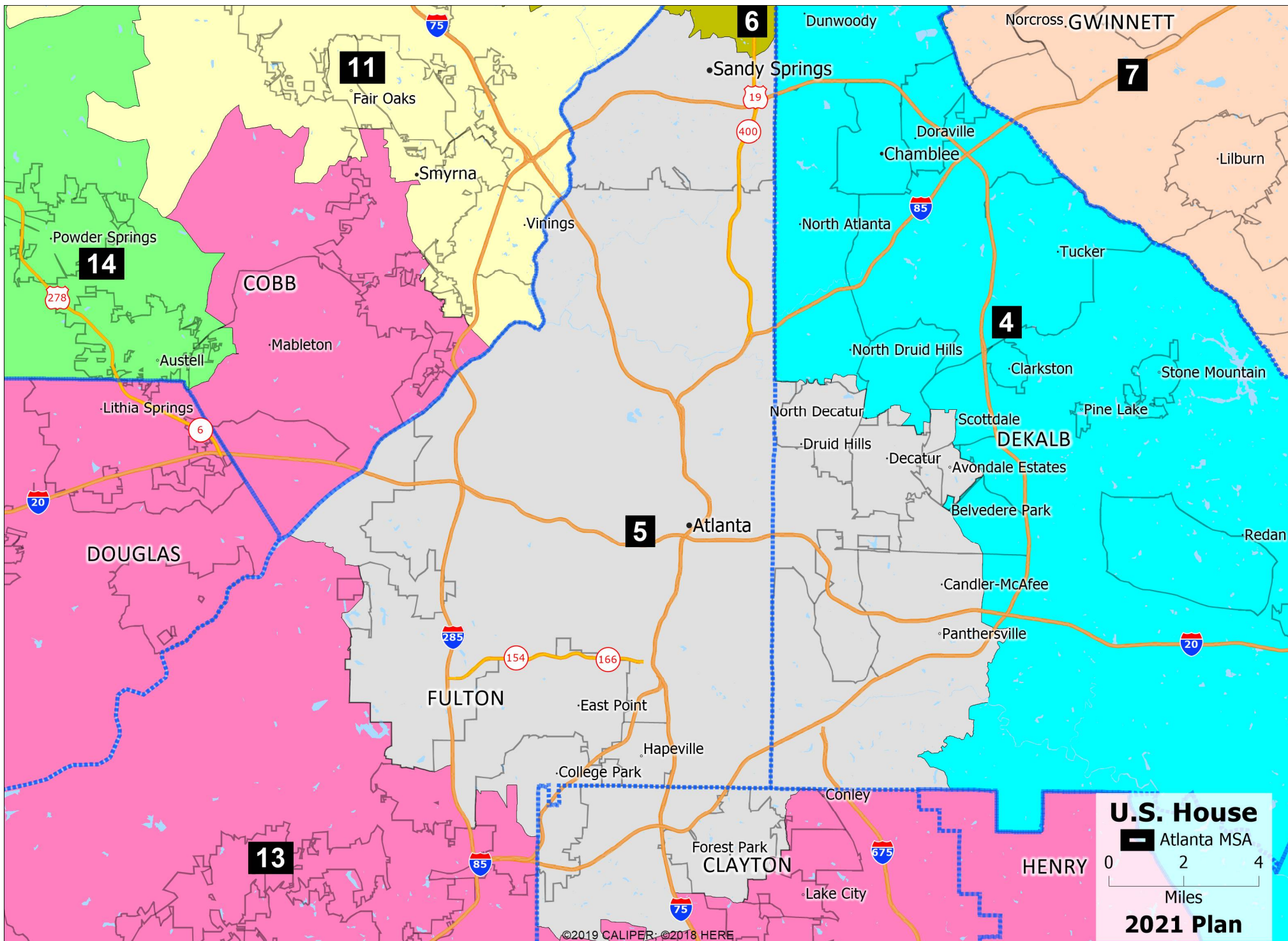
DECLARATION OF WILLIAM S. COOPER:
EXHIBIT K-2

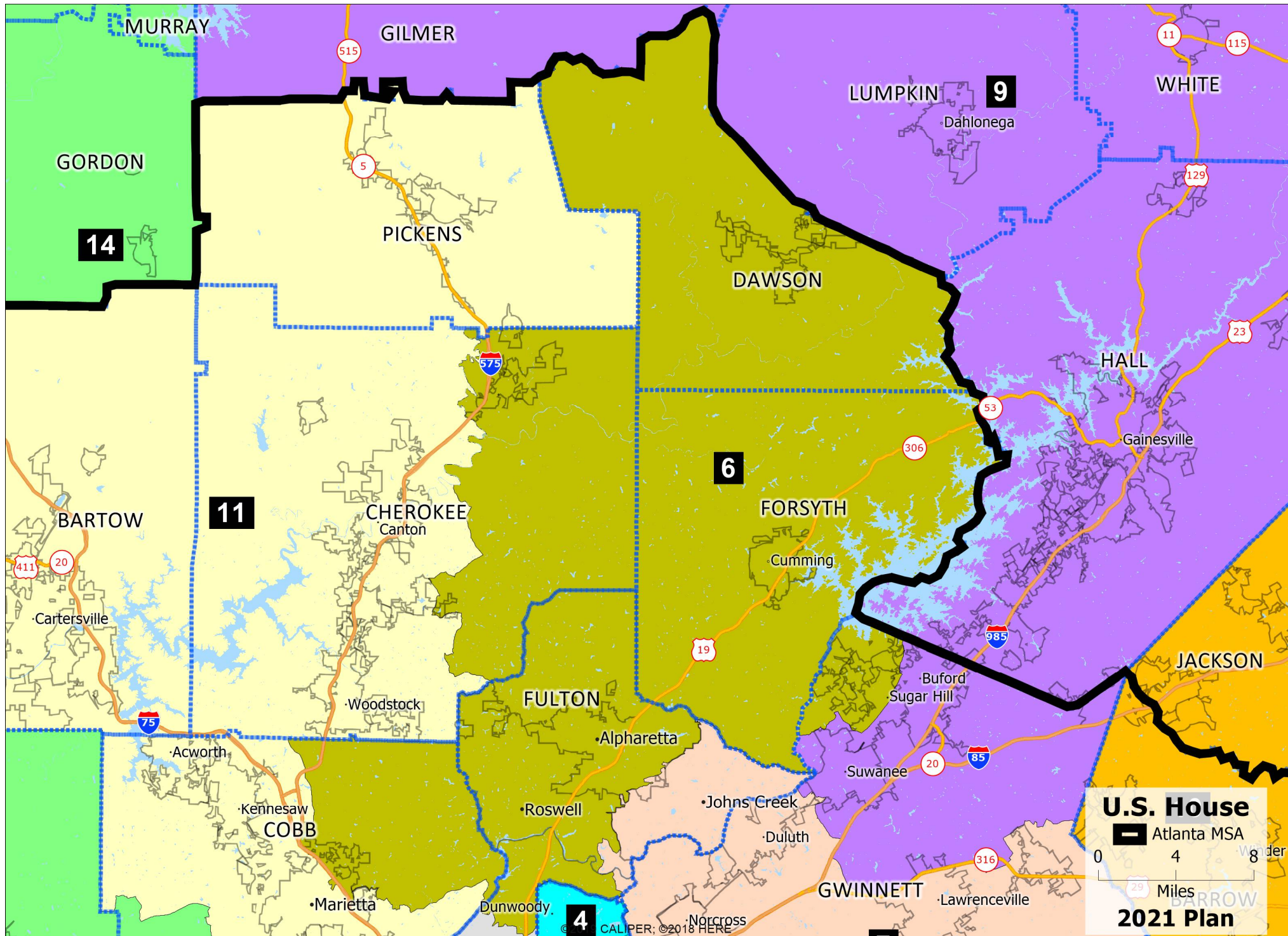


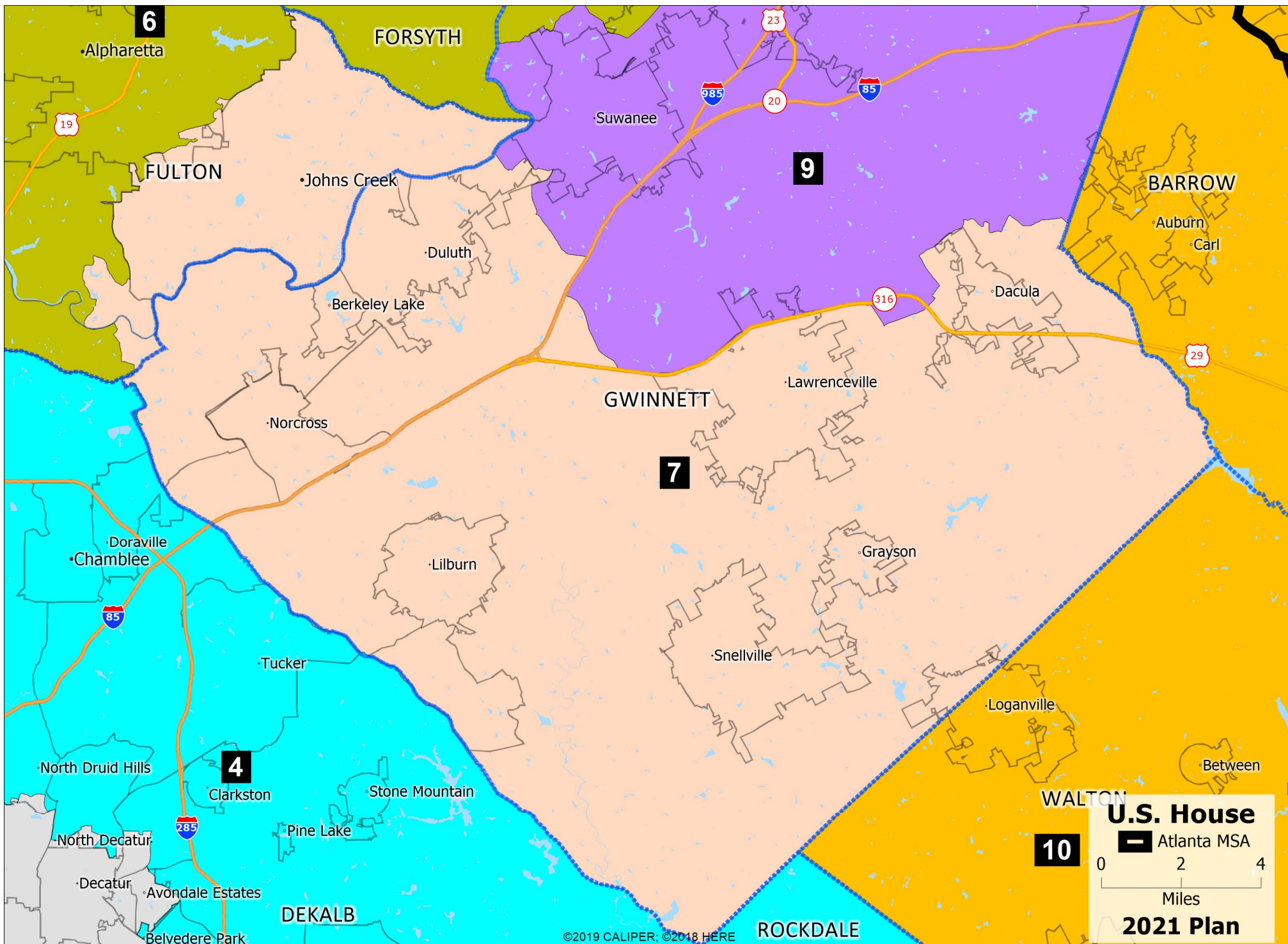


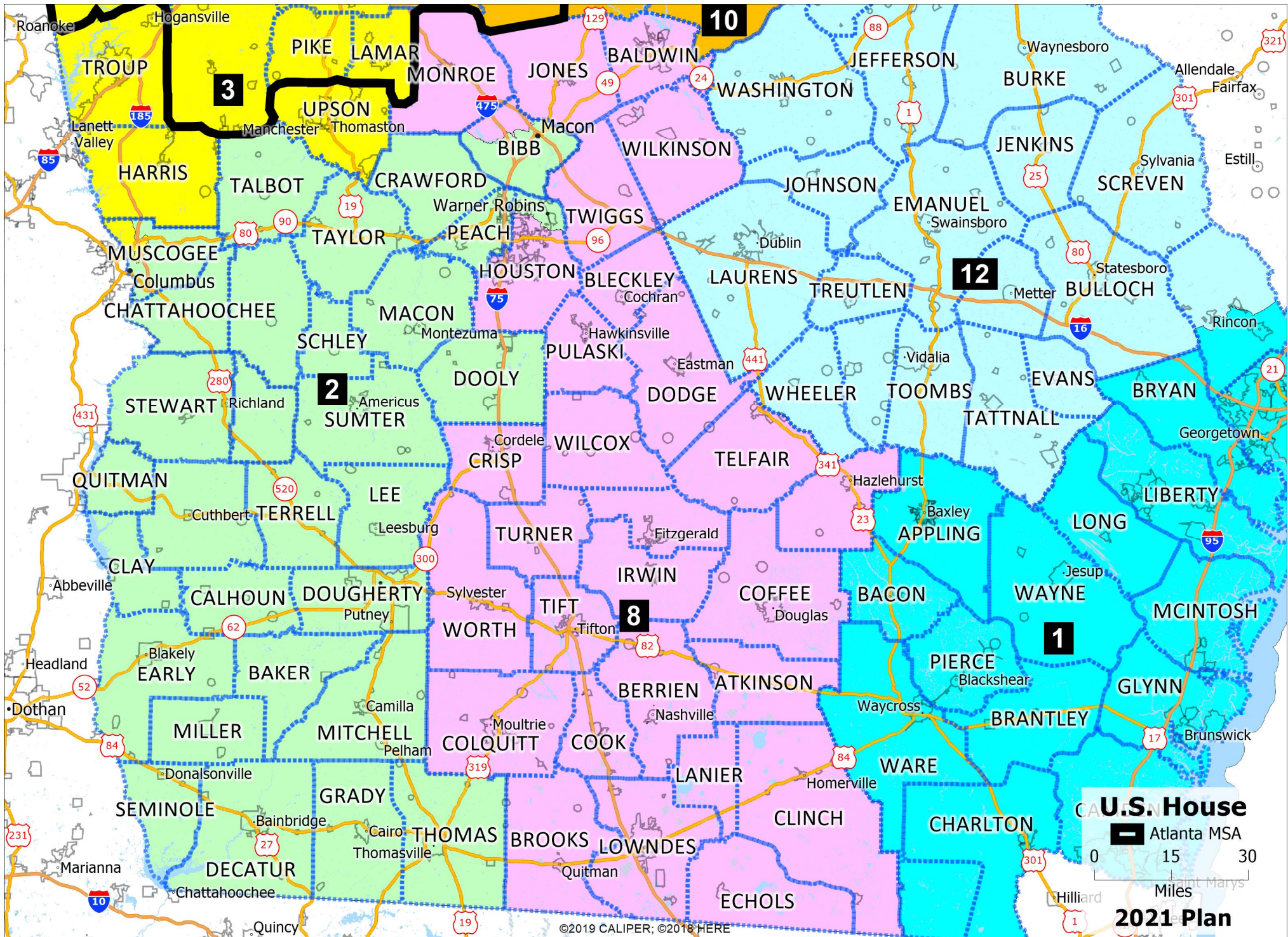


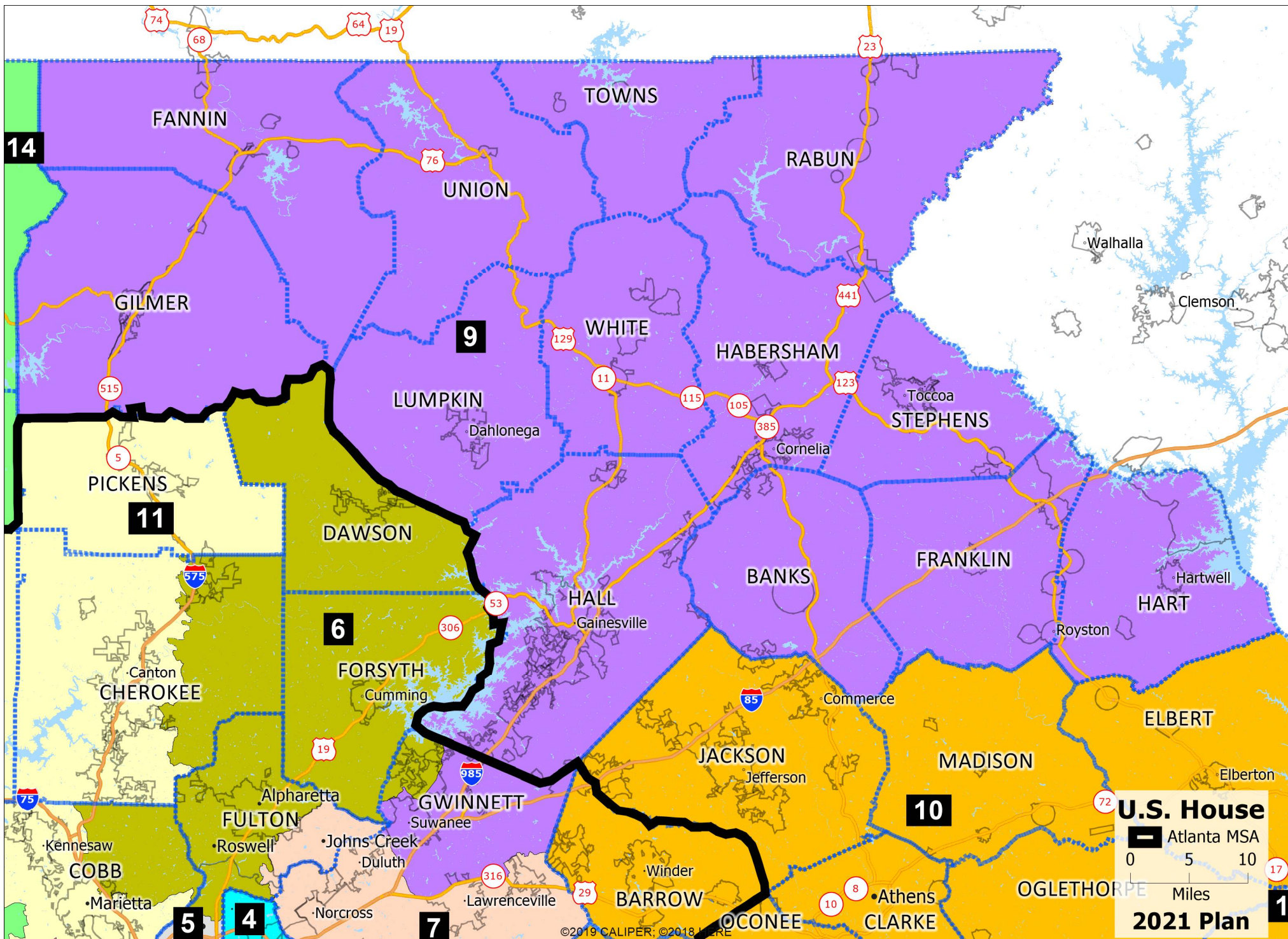


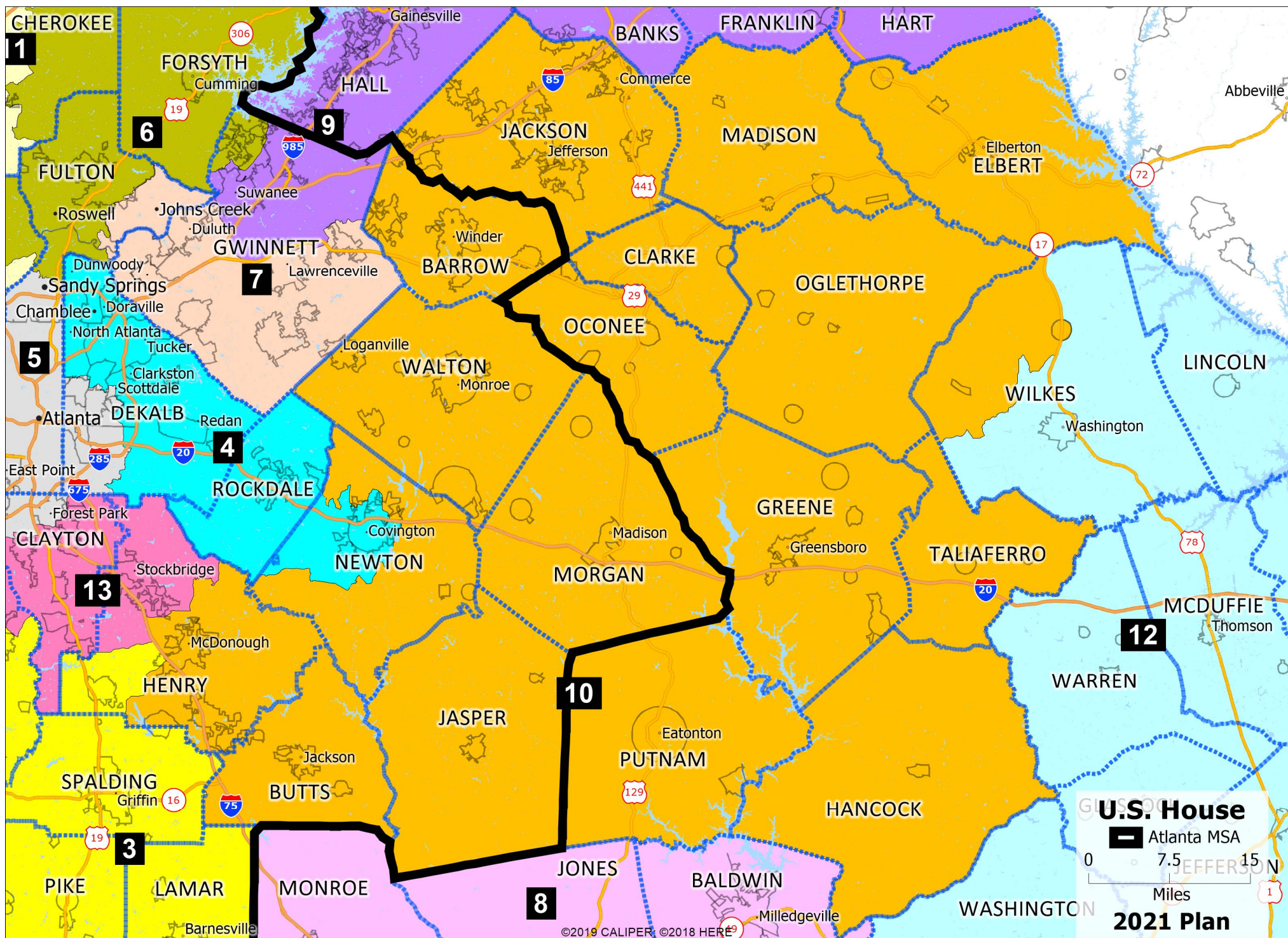


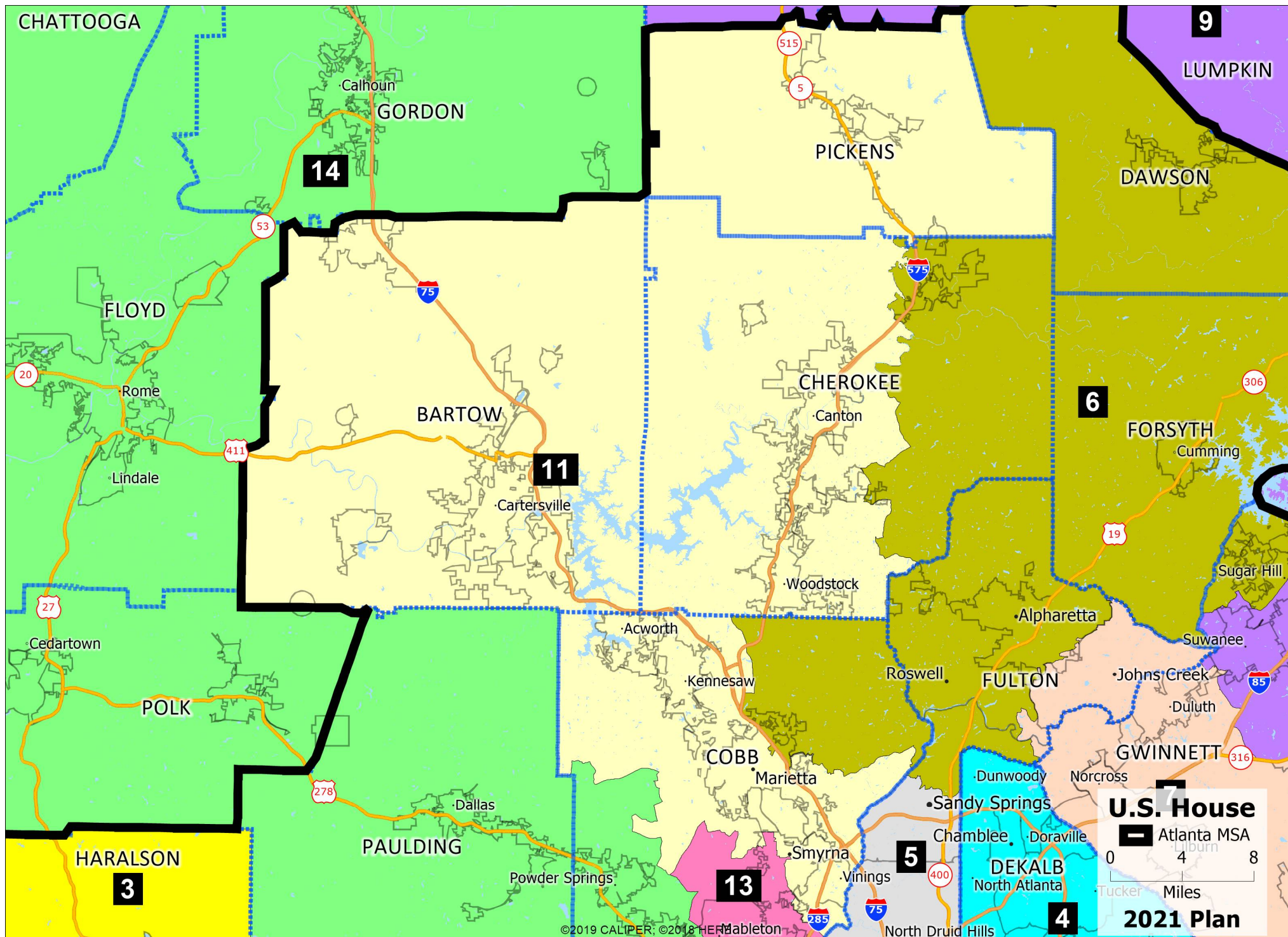




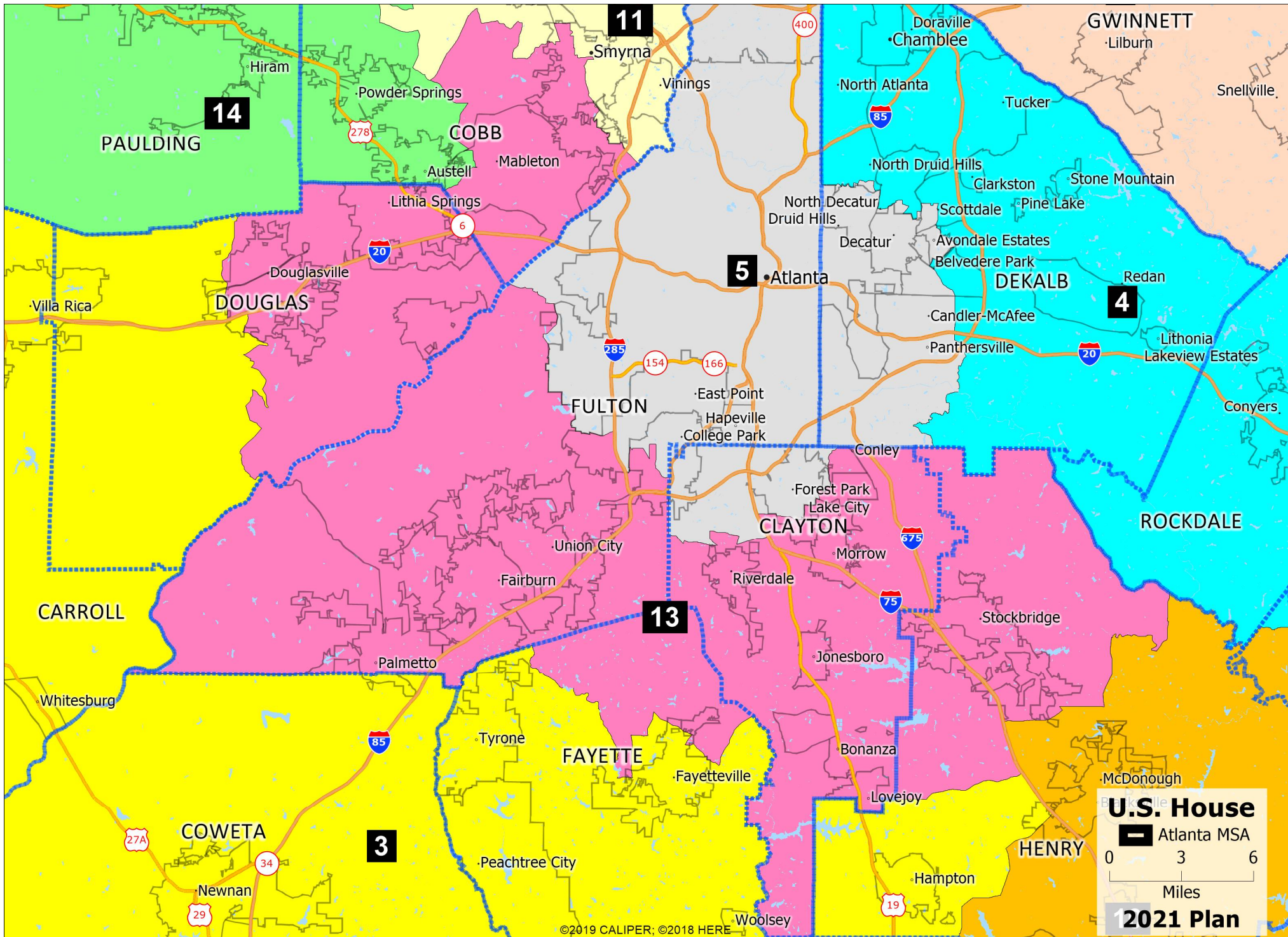


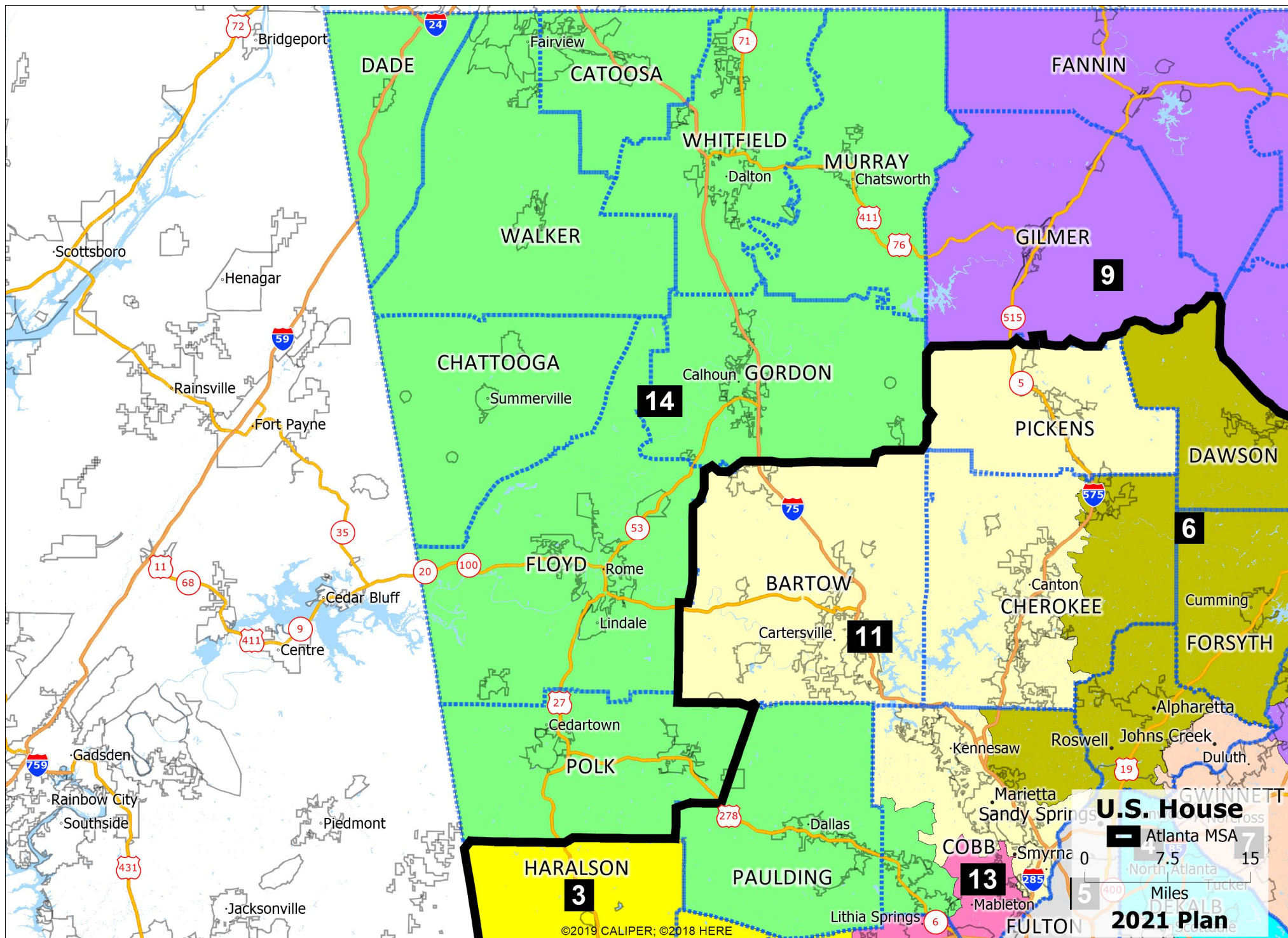












DECLARATION OF WILLIAM S. COOPER:
EXHIBIT K-3

User:

Plan Name: Enacted_2021_Plan

Plan Type:

Plan Components with Population Detail

Tuesday, November 22, 2022

4:32 PM

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 1				
County: Appling GA				
Total:	18,444	12,674	3,647	1,825
		68.72%	19.77%	9.89%
Voting Age	13,958	10,048	2,540	1,118
		71.99%	18.20%	8.01%
County: Bacon GA				
Total:	11,140	8,103	1,970	875
		72.74%	17.68%	7.85%
Voting Age	8,310	6,374	1,245	547
		76.70%	14.98%	6.58%
County: Brantley GA				
Total:	18,021	16,317	733	326
		90.54%	4.07%	1.81%
Voting Age	13,692	12,522	470	212
		91.45%	3.43%	1.55%
County: Bryan GA				
Total:	44,738	31,321	7,463	3,269
		70.01%	16.68%	7.31%
Voting Age	31,828	23,033	5,025	1,919
		72.37%	15.79%	6.03%
County: Camden GA				
Total:	54,768	37,203	11,072	3,658
		67.93%	20.22%	6.68%
Voting Age	41,808	29,410	7,828	2,457
		70.35%	18.72%	5.88%
County: Charlton GA				
Total:	12,518	7,532	2,798	2,036
		60.17%	22.35%	16.26%
Voting Age	10,135	5,929	2,147	1,971
		58.50%	21.18%	19.45%
County: Chatham GA				
Total:	295,291	139,433	115,458	23,790
		47.22%	39.10%	8.06%
Voting Age	234,715	119,161	85,178	16,551
		50.77%	36.29%	7.05%
County: Effingham GA				
Total:	47,208	35,249	6,652	2,875
		74.67%	14.09%	6.09%
Voting Age	34,272	26,449	4,374	1,700
		77.17%	12.76%	4.96%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 1				
County: Glynn GA				
Total:	84,499	52,987 62.71%	22,098 26.15%	6,336 7.50%
Voting Age	66,468	44,302 66.65%	15,620 23.50%	4,116 6.19%
County: Liberty GA				
Total:	65,256	24,004 36.78%	31,146 47.73%	7,786 11.93%
Voting Age	48,014	19,065 39.71%	21,700 45.20%	5,231 10.89%
County: Long GA				
Total:	16,168	8,774 54.27%	4,734 29.28%	1,979 12.24%
Voting Age	11,234	6,422 57.17%	3,107 27.66%	1,227 10.92%
County: McIntosh GA				
Total:	10,975	7,060 64.33%	3,400 30.98%	231 2.10%
Voting Age	9,040	5,998 66.35%	2,641 29.21%	166 1.84%
County: Pierce GA				
Total:	19,716	16,403 83.20%	1,801 9.13%	998 5.06%
Voting Age	14,899	12,662 84.99%	1,262 8.47%	595 3.99%
County: Ware GA				
Total:	36,251	22,275 61.45%	11,421 31.51%	1,612 4.45%
Voting Age	27,788	17,818 64.12%	8,226 29.60%	1,012 3.64%
County: Wayne GA				
Total:	30,144	21,301 70.66%	6,390 21.20%	1,732 5.75%
Voting Age	23,105	16,754 72.51%	4,662 20.18%	1,116 4.83%
District 1 Total				
Total:	765,137	440,636 57.59%	230,783 30.16%	59,328 7.75%
Voting Age	589,266	355,947 60.41%	166,025 28.17%	39,938 6.78%
District 2				
County: Baker GA				
Total:	2,876	1,514 52.64%	1,178 40.96%	143 4.97%
Voting Age	2,275	1,235 54.29%	932 40.97%	77 3.38%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 2				
County: Bibb GA				
Total:	108,371	29,397 27.13%	72,197 66.62%	4,818 4.45%
Voting Age	82,489	25,121 30.45%	52,370 63.49%	3,351 4.06%
County: Calhoun GA				
Total:	5,573	1,766 31.69%	3,629 65.12%	149 2.67%
Voting Age	4,687	1,567 33.43%	2,998 63.96%	90 1.92%
County: Chattahoochee GA				
Total:	9,565	5,403 56.49%	1,825 19.08%	1,610 16.83%
Voting Age	7,199	4,212 58.51%	1,287 17.88%	1,160 16.11%
County: Clay GA				
Total:	2,848	1,143 40.13%	1,634 57.37%	41 1.44%
Voting Age	2,246	973 43.32%	1,231 54.81%	19 0.85%
County: Crawford GA				
Total:	12,130	8,866 73.09%	2,455 20.24%	415 3.42%
Voting Age	9,606	7,079 73.69%	1,938 20.17%	287 2.99%
County: Decatur GA				
Total:	29,367	14,280 48.63%	12,583 42.85%	1,911 6.51%
Voting Age	22,443	11,586 51.62%	9,189 40.94%	1,196 5.33%
County: Dooly GA				
Total:	11,208	4,611 41.14%	5,652 50.43%	797 7.11%
Voting Age	9,187	4,029 43.86%	4,526 49.27%	493 5.37%
County: Dougherty GA				
Total:	85,790	20,631 24.05%	61,457 71.64%	2,413 2.81%
Voting Age	66,266	17,909 27.03%	45,631 68.86%	1,591 2.40%
County: Early GA				
Total:	10,854	4,813 44.34%	5,688 52.40%	186 1.71%
Voting Age	8,315	3,985 47.93%	4,075 49.01%	113 1.36%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 2				
County: Grady GA				
Total:	26,236	14,715 56.09%	7,693 29.32%	3,273 12.48%
Voting Age	19,962	11,968 59.95%	5,678 28.44%	1,857 9.30%
County: Houston GA				
Total:	48,521	19,375 39.93%	22,637 46.65%	4,663 9.61%
Voting Age	36,233	16,052 44.30%	15,657 43.21%	2,988 8.25%
County: Lee GA				
Total:	33,163	22,758 68.62%	7,755 23.38%	953 2.87%
Voting Age	24,676	17,356 70.34%	5,503 22.30%	603 2.44%
County: Macon GA				
Total:	12,082	4,078 33.75%	7,296 60.39%	472 3.91%
Voting Age	9,938	3,379 34.00%	6,021 60.59%	322 3.24%
County: Marion GA				
Total:	7,498	4,486 59.83%	2,223 29.65%	560 7.47%
Voting Age	5,854	3,643 62.23%	1,687 28.82%	337 5.76%
County: Miller GA				
Total:	6,000	3,949 65.82%	1,831 30.52%	136 2.27%
Voting Age	4,749	3,239 68.20%	1,358 28.60%	92 1.94%
County: Mitchell GA				
Total:	21,755	10,106 46.45%	10,394 47.78%	964 4.43%
Voting Age	17,065	8,284 48.54%	7,917 46.39%	615 3.60%
County: Muscogee GA				
Total:	175,155	58,991 33.68%	95,521 54.54%	13,791 7.87%
Voting Age	132,158	48,043 36.35%	69,548 52.62%	9,099 6.88%
County: Peach GA				
Total:	27,981	12,119 43.31%	12,645 45.19%	2,547 9.10%
Voting Age	22,111	10,071 45.55%	9,720 43.96%	1,788 8.09%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 2				
County: Quitman GA				
Total:	2,235	1,190	965	31
		53.24%	43.18%	1.39%
Voting Age	1,870	1,037	765	18
		55.45%	40.91%	0.96%
County: Randolph GA				
Total:	6,425	2,250	3,947	143
		35.02%	61.43%	2.23%
Voting Age	4,977	1,922	2,913	82
		38.62%	58.53%	1.65%
County: Schley GA				
Total:	4,547	3,357	933	175
		73.83%	20.52%	3.85%
Voting Age	3,328	2,520	644	103
		75.72%	19.35%	3.09%
County: Seminole GA				
Total:	9,147	5,617	3,093	228
		61.41%	33.81%	2.49%
Voting Age	7,277	4,681	2,275	160
		64.33%	31.26%	2.20%
County: Stewart GA				
Total:	5,314	1,338	2,538	1,217
		25.18%	47.76%	22.90%
Voting Age	4,617	1,161	2,048	1,196
		25.15%	44.36%	25.90%
County: Sumter GA				
Total:	29,616	11,528	15,546	1,770
		38.92%	52.49%	5.98%
Voting Age	23,036	9,800	11,479	1,147
		42.54%	49.83%	4.98%
County: Talbot GA				
Total:	5,733	2,427	3,145	112
		42.33%	54.86%	1.95%
Voting Age	4,783	2,129	2,537	56
		44.51%	53.04%	1.17%
County: Taylor GA				
Total:	7,816	4,584	2,946	168
		58.65%	37.69%	2.15%
Voting Age	6,120	3,686	2,235	107
		60.23%	36.52%	1.75%
County: Terrell GA				
Total:	9,185	3,189	5,707	177
		34.72%	62.13%	1.93%
Voting Age	7,204	2,709	4,274	121
		37.60%	59.33%	1.68%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 2				
County: Thomas GA				
Total:	45,798	25,994	16,975	1,577
		56.76%	37.06%	3.44%
Voting Age	35,037	20,740	12,332	970
		59.19%	35.20%	2.77%
County: Webster GA				
Total:	2,348	1,136	1,107	59
		48.38%	47.15%	2.51%
Voting Age	1,847	931	844	36
		50.41%	45.70%	1.95%
District 2 Total				
Total:	765,137	305,611	393,195	45,499
		39.94%	51.39%	5.95%
Voting Age	587,555	251,047	289,612	30,074
		42.73%	49.29%	5.12%
District 3				
County: Carroll GA				
Total:	119,148	80,725	24,618	9,586
		67.75%	20.66%	8.05%
Voting Age	90,996	63,803	17,827	6,129
		70.12%	19.59%	6.74%
County: Coweta GA				
Total:	146,158	99,421	28,289	11,053
		68.02%	19.36%	7.56%
Voting Age	111,155	78,073	20,196	7,384
		70.24%	18.17%	6.64%
County: Douglas GA				
Total:	42,970	23,414	13,641	4,200
		54.49%	31.75%	9.77%
Voting Age	32,601	18,942	9,682	2,674
		58.10%	29.70%	8.20%
County: Fayette GA				
Total:	102,685	63,073	22,742	8,065
		61.42%	22.15%	7.85%
Voting Age	78,539	50,575	16,446	5,270
		64.39%	20.94%	6.71%
County: Haralson GA				
Total:	29,919	26,825	1,541	497
		89.66%	5.15%	1.66%
Voting Age	22,854	20,617	1,106	323
		90.21%	4.84%	1.41%
County: Harris GA				
Total:	34,668	25,925	5,742	1,417
		74.78%	16.56%	4.09%
Voting Age	26,799	20,298	4,431	908
		75.74%	16.53%	3.39%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 3				
County: Heard GA				
Total:	11,412	9,589	1,142	253
		84.03%	10.01%	2.22%
Voting Age	8,698	7,407	832	153
		85.16%	9.57%	1.76%
County: Henry GA				
Total:	23,975	9,476	11,842	1,939
		39.52%	49.39%	8.09%
Voting Age	17,964	7,737	8,404	1,199
		43.07%	46.78%	6.67%
County: Lamar GA				
Total:	18,500	12,344	5,220	475
		66.72%	28.22%	2.57%
Voting Age	14,541	9,852	4,017	323
		67.75%	27.63%	2.22%
County: Meriwether GA				
Total:	20,613	12,084	7,547	475
		58.62%	36.61%	2.30%
Voting Age	16,526	9,994	5,845	299
		60.47%	35.37%	1.81%
County: Muscogee GA				
Total:	31,767	20,092	6,691	2,722
		63.25%	21.06%	8.57%
Voting Age	24,894	16,592	4,753	1,795
		66.65%	19.09%	7.21%
County: Pike GA				
Total:	18,889	16,313	1,613	348
		86.36%	8.54%	1.84%
Voting Age	14,337	12,422	1,254	207
		86.64%	8.75%	1.44%
County: Spalding GA				
Total:	67,306	37,105	24,522	3,666
		55.13%	36.43%	5.45%
Voting Age	52,123	30,612	17,511	2,377
		58.73%	33.60%	4.56%
County: Troup GA				
Total:	69,426	38,099	25,473	2,956
		54.88%	36.69%	4.26%
Voting Age	52,581	30,377	18,202	1,822
		57.77%	34.62%	3.47%
County: Upson GA				
Total:	27,700	18,009	8,324	633
		65.01%	30.05%	2.29%
Voting Age	21,711	14,548	6,202	411
		67.01%	28.57%	1.89%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 3				
District 3 Total				
Total:	765,136	492,494	188,947	48,285
		64.37%	24.69%	6.31%
Voting Age	586,319	391,849	136,708	31,274
		66.83%	23.32%	5.33%
District 4				
County: DeKalb GA				
Total:	601,451	153,733	322,421	74,201
		25.56%	53.61%	12.34%
Voting Age	465,661	129,178	247,548	50,261
		27.74%	53.16%	10.79%
County: Newton GA				
Total:	70,114	19,303	44,138	5,206
		27.53%	62.95%	7.43%
Voting Age	52,306	15,909	31,896	3,320
		30.42%	60.98%	6.35%
County: Rockdale GA				
Total:	93,570	24,500	57,204	9,540
		26.18%	61.13%	10.20%
Voting Age	71,503	21,457	41,935	6,089
		30.01%	58.65%	8.52%
District 4 Total				
Total:	765,135	197,536	423,763	88,947
		25.82%	55.38%	11.63%
Voting Age	589,470	166,544	321,379	59,670
		28.25%	54.52%	10.12%
District 5				
County: Clayton GA				
Total:	37,919	2,578	27,594	6,497
		6.80%	72.77%	17.13%
Voting Age	27,885	2,344	20,301	4,185
		8.41%	72.80%	15.01%
County: DeKalb GA				
Total:	162,931	62,162	85,030	7,270
		38.15%	52.19%	4.46%
Voting Age	129,615	50,983	66,682	5,245
		39.33%	51.45%	4.05%
County: Fulton GA				
Total:	564,287	209,079	280,198	42,729
		37.05%	49.66%	7.57%
Voting Age	464,015	182,325	221,288	32,002
		39.29%	47.69%	6.90%
District 5 Total				
Total:	765,137	273,819	392,822	56,496
		35.79%	51.34%	7.38%
Voting Age	621,515	235,652	308,271	41,432
		37.92%	49.60%	6.67%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 6				
County: Cherokee GA				
Total:	40,881	34,848	1,489	2,494
		85.24%	3.64%	6.10%
Voting Age	31,202	27,176	950	1,623
		87.10%	3.04%	5.20%
County: Cobb GA				
Total:	165,925	110,373	19,055	15,022
		66.52%	11.48%	9.05%
Voting Age	125,728	86,781	13,732	10,102
		69.02%	10.92%	8.03%
County: Dawson GA				
Total:	26,798	23,544	392	1,605
		87.86%	1.46%	5.99%
Voting Age	21,441	19,183	249	1,047
		89.47%	1.16%	4.88%
County: Forsyth GA				
Total:	251,283	159,407	13,222	25,226
		63.44%	5.26%	10.04%
Voting Age	181,193	122,017	8,751	16,204
		67.34%	4.83%	8.94%
County: Fulton GA				
Total:	245,494	140,483	39,678	28,786
		57.22%	16.16%	11.73%
Voting Age	190,172	113,635	29,939	19,957
		59.75%	15.74%	10.49%
County: Gwinnett GA				
Total:	34,755	18,745	5,035	5,166
		53.93%	14.49%	14.86%
Voting Age	25,061	14,179	3,348	3,420
		56.58%	13.36%	13.65%
District 6 Total				
Total:	765,136	487,400	78,871	78,299
		63.70%	10.31%	10.23%
Voting Age	574,797	382,971	56,969	52,353
		66.63%	9.91%	9.11%
District 7				
County: Fulton GA				
Total:	92,558	45,964	11,462	6,614
		49.66%	12.38%	7.15%
Voting Age	69,229	36,341	8,135	4,468
		52.49%	11.75%	6.45%
County: Gwinnett GA				
Total:	672,579	179,941	228,255	175,237
		26.75%	33.94%	26.05%
Voting Age	497,705	149,497	160,936	116,136
		30.04%	32.34%	23.33%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 7				
District 7 Total				
Total:	765,137	225,905	239,717	181,851
		29.52%	31.33%	23.77%
Voting Age	566,934	185,838	169,071	120,604
		32.78%	29.82%	21.27%
District 8				
County: Atkinson GA				
Total:	8,286	4,801	1,284	2,048
		57.94%	15.50%	24.72%
Voting Age	6,129	3,787	937	1,282
		61.79%	15.29%	20.92%
County: Baldwin GA				
Total:	43,799	22,432	18,985	1,139
		51.22%	43.35%	2.60%
Voting Age	35,732	19,377	14,515	835
		54.23%	40.62%	2.34%
County: Ben Hill GA				
Total:	17,194	9,219	6,537	1,054
		53.62%	38.02%	6.13%
Voting Age	13,165	7,459	4,745	653
		56.66%	36.04%	4.96%
County: Berrien GA				
Total:	18,160	14,396	2,198	1,045
		79.27%	12.10%	5.75%
Voting Age	13,690	11,181	1,499	622
		81.67%	10.95%	4.54%
County: Bibb GA				
Total:	48,975	27,390	16,668	1,919
		55.93%	34.03%	3.92%
Voting Age	38,413	22,858	11,900	1,383
		59.51%	30.98%	3.60%
County: Bleckley GA				
Total:	12,583	8,867	2,951	469
		70.47%	23.45%	3.73%
Voting Age	9,613	7,032	2,036	311
		73.15%	21.18%	3.24%
County: Brooks GA				
Total:	16,301	9,066	5,958	955
		55.62%	36.55%	5.86%
Voting Age	12,747	7,483	4,357	635
		58.70%	34.18%	4.98%
County: Clinch GA				
Total:	6,749	4,256	2,096	253
		63.06%	31.06%	3.75%
Voting Age	5,034	3,372	1,406	156
		66.98%	27.93%	3.10%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 8				
County: Coffee GA				
Total:	43,092	24,158 56.06%	12,575 29.18%	5,430 12.60%
Voting Age	32,419	19,146 59.06%	9,191 28.35%	3,324 10.25%
County: Colquitt GA				
Total:	45,898	25,588 55.75%	10,648 23.20%	8,709 18.97%
Voting Age	34,193	20,507 59.97%	7,461 21.82%	5,467 15.99%
County: Cook GA				
Total:	17,229	10,658 61.86%	5,014 29.10%	1,134 6.58%
Voting Age	12,938	8,310 64.23%	3,595 27.79%	704 5.44%
County: Crisp GA				
Total:	20,128	9,892 49.15%	9,194 45.68%	634 3.15%
Voting Age	15,570	8,248 52.97%	6,603 42.41%	414 2.66%
County: Dodge GA				
Total:	19,925	12,865 64.57%	6,148 30.86%	620 3.11%
Voting Age	15,709	10,360 65.95%	4,725 30.08%	406 2.58%
County: Echols GA				
Total:	3,697	2,328 62.97%	193 5.22%	1,091 29.51%
Voting Age	2,709	1,856 68.51%	121 4.47%	667 24.62%
County: Houston GA				
Total:	115,112	66,836 58.06%	33,883 29.43%	7,144 6.21%
Voting Age	85,885	51,966 60.51%	23,948 27.88%	4,542 5.29%
County: Irwin GA				
Total:	9,666	6,402 66.23%	2,333 24.14%	663 6.86%
Voting Age	7,547	5,047 66.87%	1,720 22.79%	545 7.22%
County: Jeff Davis GA				
Total:	14,779	9,950 67.33%	2,493 16.87%	2,047 13.85%
Voting Age	10,856	7,643 70.40%	1,752 16.14%	1,233 11.36%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 8				
County: Jones GA				
Total:	28,347	20,074	7,114	476
		70.82%	25.10%	1.68%
Voting Age	21,575	15,428	5,341	302
		71.51%	24.76%	1.40%
County: Lanier GA				
Total:	9,877	6,595	2,369	572
		66.77%	23.99%	5.79%
Voting Age	7,326	5,010	1,683	370
		68.39%	22.97%	5.05%
County: Lowndes GA				
Total:	118,251	59,306	46,758	7,872
		50.15%	39.54%	6.66%
Voting Age	89,031	47,140	33,302	5,201
		52.95%	37.40%	5.84%
County: Monroe GA				
Total:	27,957	19,954	6,444	714
		71.37%	23.05%	2.55%
Voting Age	21,913	15,771	5,068	464
		71.97%	23.13%	2.12%
County: Pulaski GA				
Total:	9,855	6,022	3,250	327
		61.11%	32.98%	3.32%
Voting Age	8,012	5,027	2,564	224
		62.74%	32.00%	2.80%
County: Telfair GA				
Total:	12,477	5,970	4,754	1,928
		47.85%	38.10%	15.45%
Voting Age	10,190	4,802	3,806	1,757
		47.12%	37.35%	17.24%
County: Tift GA				
Total:	41,344	22,189	12,734	5,219
		53.67%	30.80%	12.62%
Voting Age	31,224	18,011	8,963	3,295
		57.68%	28.71%	10.55%
County: Turner GA				
Total:	9,006	4,700	3,813	372
		52.19%	42.34%	4.13%
Voting Age	6,960	3,891	2,752	256
		55.91%	39.54%	3.68%
County: Twiggs GA				
Total:	8,022	4,487	3,226	124
		55.93%	40.21%	1.55%
Voting Age	6,589	3,733	2,627	79
		56.66%	39.87%	1.20%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 8				
County: Wilcox GA				
Total:	8,766	5,185 59.15%	3,161 36.06%	272 3.10%
Voting Age	7,218	4,215 58.40%	2,693 37.31%	209 2.90%
County: Wilkinson GA				
Total:	8,877	5,110 57.56%	3,330 37.51%	239 2.69%
Voting Age	7,026	4,165 59.28%	2,549 36.28%	152 2.16%
County: Worth GA				
Total:	20,784	14,427 69.41%	5,517 26.54%	381 1.83%
Voting Age	16,444	11,747 71.44%	4,108 24.98%	244 1.48%
District 8 Total				
Total:	765,136	443,123 57.91%	241,628 31.58%	54,850 7.17%
Voting Age	585,857	354,572 60.52%	175,967 30.04%	35,732 6.10%
District 9				
County: Banks GA				
Total:	18,035	15,578 86.38%	589 3.27%	1,164 6.45%
Voting Age	13,900	12,278 88.33%	365 2.63%	721 5.19%
County: Fannin GA				
Total:	25,319	23,351 92.23%	199 0.79%	753 2.97%
Voting Age	21,188	19,721 93.08%	133 0.63%	505 2.38%
County: Franklin GA				
Total:	23,424	19,262 82.23%	2,207 9.42%	1,121 4.79%
Voting Age	18,307	15,466 84.48%	1,523 8.32%	678 3.70%
County: Gilmer GA				
Total:	31,353	26,365 84.09%	296 0.94%	3,599 11.48%
Voting Age	25,417	22,187 87.29%	161 0.63%	2,158 8.49%
County: Gwinnett GA				
Total:	249,728	111,897 44.81%	54,397 21.78%	40,057 16.04%
Voting Age	186,718	88,365 47.33%	38,478 20.61%	27,103 14.52%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Blak	[Hispanic Origin]
District 9				
County: Habersham GA				
Total:	46,031	34,694 75.37%	2,165 4.70%	6,880 14.95%
Voting Age	35,878	28,299 78.88%	1,675 4.67%	4,115 11.47%
County: Hall GA				
Total:	203,136	120,418 59.28%	17,006 8.37%	57,010 28.06%
Voting Age	153,844	98,800 64.22%	12,094 7.86%	36,146 23.50%
County: Hart GA				
Total:	25,828	19,250 74.53%	4,732 18.32%	931 3.60%
Voting Age	20,436	15,761 77.12%	3,447 16.87%	578 2.83%
County: Lumpkin GA				
Total:	33,488	29,241 87.32%	685 2.05%	1,790 5.35%
Voting Age	27,689	24,419 88.19%	507 1.83%	1,345 4.86%
County: Rabun GA				
Total:	16,883	14,625 86.63%	210 1.24%	1,452 8.60%
Voting Age	13,767	12,236 88.88%	129 0.94%	928 6.74%
County: Stephens GA				
Total:	26,784	21,323 79.61%	3,527 13.17%	857 3.20%
Voting Age	21,163	17,310 81.79%	2,467 11.66%	578 2.73%
County: Towns GA				
Total:	12,493	11,469 91.80%	168 1.34%	415 3.32%
Voting Age	10,923	10,100 92.47%	137 1.25%	338 3.09%
County: Union GA				
Total:	24,632	22,646 91.94%	228 0.93%	816 3.31%
Voting Age	20,808	19,351 93.00%	147 0.71%	563 2.71%
County: White GA				
Total:	28,003	24,959 89.13%	721 2.57%	913 3.26%
Voting Age	22,482	20,318 90.37%	484 2.15%	605 2.69%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 9				
District 9 Total				
Total:	765,137	495,078	87,130	117,758
		64.70%	11.39%	15.39%
Voting Age	592,520	404,611	61,747	76,361
		68.29%	10.42%	12.89%
District 10				
County: Barrow GA				
Total:	83,505	55,582	11,907	10,560
		66.56%	14.26%	12.65%
Voting Age	62,195	43,241	8,222	6,726
		69.52%	13.22%	10.81%
County: Butts GA				
Total:	25,434	16,628	7,212	803
		65.38%	28.36%	3.16%
Voting Age	20,360	13,510	5,660	559
		66.36%	27.80%	2.75%
County: Clarke GA				
Total:	128,671	72,201	33,672	14,336
		56.11%	26.17%	11.14%
Voting Age	106,830	64,531	24,776	10,213
		60.41%	23.19%	9.56%
County: Elbert GA				
Total:	19,637	12,610	5,520	996
		64.22%	28.11%	5.07%
Voting Age	15,493	10,322	4,122	660
		66.62%	26.61%	4.26%
County: Greene GA				
Total:	18,915	11,126	6,027	1,289
		58.82%	31.86%	6.81%
Voting Age	15,358	9,675	4,470	826
		63.00%	29.11%	5.38%
County: Hancock GA				
Total:	8,735	2,413	6,131	63
		27.62%	70.19%	0.72%
Voting Age	7,487	2,220	5,108	47
		29.65%	68.22%	0.63%
County: Henry GA				
Total:	118,452	51,338	54,850	8,409
		43.34%	46.31%	7.10%
Voting Age	86,869	40,092	38,346	5,466
		46.15%	44.14%	6.29%
County: Jackson GA				
Total:	75,907	59,064	6,148	6,712
		77.81%	8.10%	8.84%
Voting Age	56,451	45,015	4,268	4,261
		79.74%	7.56%	7.55%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 10				
County: Jasper GA				
Total:	14,588	10,771 73.83%	2,676 18.34%	684 4.69%
Voting Age	11,118	8,400 75.55%	1,966 17.68%	402 3.62%
County: Madison GA				
Total:	30,120	23,549 78.18%	3,196 10.61%	1,956 6.49%
Voting Age	23,112	18,643 80.66%	2,225 9.63%	1,198 5.18%
County: Morgan GA				
Total:	20,097	14,487 72.09%	4,339 21.59%	712 3.54%
Voting Age	15,574	11,452 73.53%	3,280 21.06%	434 2.79%
County: Newton GA				
Total:	42,369	27,443 64.77%	11,763 27.76%	1,958 4.62%
Voting Age	32,442	21,722 66.96%	8,537 26.31%	1,241 3.83%
County: Oconee GA				
Total:	41,799	33,886 81.07%	2,280 5.45%	2,347 5.61%
Voting Age	30,221	24,942 82.53%	1,660 5.49%	1,405 4.65%
County: Oglethorpe GA				
Total:	14,825	10,903 73.54%	2,468 16.65%	869 5.86%
Voting Age	11,639	8,799 75.60%	1,853 15.92%	531 4.56%
County: Putnam GA				
Total:	22,047	14,316 64.93%	5,701 25.86%	1,557 7.06%
Voting Age	17,847	12,209 68.41%	4,229 23.70%	1,031 5.78%
County: Taliaferro GA				
Total:	1,559	591 37.91%	876 56.19%	69 4.43%
Voting Age	1,289	506 39.26%	722 56.01%	46 3.57%
County: Walton GA				
Total:	96,673	68,499 70.86%	18,804 19.45%	5,228 5.41%
Voting Age	73,098	53,647 73.39%	13,165 18.01%	3,236 4.43%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 10				
County: Wilkes GA				
Total:	1,802	1,080	567	97
		59.93%	31.47%	5.38%
Voting Age	1,491	897	488	54
		60.16%	32.73%	3.62%
District 10 Total				
Total:	765,135	486,487	184,137	58,645
		63.58%	24.07%	7.66%
Voting Age	588,874	389,823	133,097	38,336
		66.20%	22.60%	6.51%
District 11				
County: Bartow GA				
Total:	108,901	80,159	13,395	10,751
		73.61%	12.30%	9.87%
Voting Age	83,570	63,759	9,377	6,817
		76.29%	11.22%	8.16%
County: Cherokee GA				
Total:	225,739	163,019	20,198	29,617
		72.22%	8.95%	13.12%
Voting Age	171,726	128,979	14,026	19,292
		75.11%	8.17%	11.23%
County: Cobb GA				
Total:	397,281	195,964	109,299	58,228
		49.33%	27.51%	14.66%
Voting Age	313,106	163,531	83,089	39,938
		52.23%	26.54%	12.76%
County: Pickens GA				
Total:	33,216	30,122	512	1,198
		90.69%	1.54%	3.61%
Voting Age	26,799	24,626	319	755
		91.89%	1.19%	2.82%
District 11 Total				
Total:	765,137	469,264	143,404	99,794
		61.33%	18.74%	13.04%
Voting Age	595,201	380,895	106,811	66,802
		63.99%	17.95%	11.22%
District 12				
County: Bulloch GA				
Total:	81,099	49,712	24,375	4,180
		61.30%	30.06%	5.15%
Voting Age	64,494	41,041	18,220	3,021
		63.64%	28.25%	4.68%
County: Burke GA				
Total:	24,596	11,941	11,430	777
		48.55%	46.47%	3.16%
Voting Age	18,778	9,566	8,362	494
		50.94%	44.53%	2.63%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 12				
County: Candler GA				
Total:	10,981	6,567	2,807	1,378
		59.80%	25.56%	12.55%
Voting Age	8,241	5,229	2,009	835
		63.45%	24.38%	10.13%
County: Columbia GA				
Total:	156,010	99,111	32,516	11,858
		63.53%	20.84%	7.60%
Voting Age	114,823	76,070	22,273	7,355
		66.25%	19.40%	6.41%
County: Effingham GA				
Total:	17,561	12,955	3,383	617
		73.77%	19.26%	3.51%
Voting Age	13,023	9,788	2,457	354
		75.16%	18.87%	2.72%
County: Emanuel GA				
Total:	22,768	13,815	7,556	993
		60.68%	33.19%	4.36%
Voting Age	17,320	11,013	5,404	589
		63.59%	31.20%	3.40%
County: Evans GA				
Total:	10,774	6,038	3,273	1,237
		56.04%	30.38%	11.48%
Voting Age	8,127	4,826	2,410	731
		59.38%	29.65%	8.99%
County: Glascock GA				
Total:	2,884	2,573	226	52
		89.22%	7.84%	1.80%
Voting Age	2,236	2,003	167	31
		89.58%	7.47%	1.39%
County: Jefferson GA				
Total:	15,709	6,834	8,208	462
		43.50%	52.25%	2.94%
Voting Age	12,301	5,536	6,324	280
		45.00%	51.41%	2.28%
County: Jenkins GA				
Total:	8,674	4,611	3,638	303
		53.16%	41.94%	3.49%
Voting Age	7,005	3,874	2,843	194
		55.30%	40.59%	2.77%
County: Johnson GA				
Total:	9,189	5,800	3,124	117
		63.12%	34.00%	1.27%
Voting Age	7,474	4,790	2,513	82
		64.09%	33.62%	1.10%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 12				
County: Laurens GA				
Total:	49,570	27,881	19,132	1,424
		56.25%	38.60%	2.87%
Voting Age	37,734	22,229	13,695	923
		58.91%	36.29%	2.45%
County: Lincoln GA				
Total:	7,690	5,196	2,212	92
		67.57%	28.76%	1.20%
Voting Age	6,270	4,316	1,728	54
		68.84%	27.56%	0.86%
County: McDuffie GA				
Total:	21,632	11,417	9,045	790
		52.78%	41.81%	3.65%
Voting Age	16,615	9,359	6,425	536
		56.33%	38.67%	3.23%
County: Montgomery GA				
Total:	8,610	5,665	2,224	571
		65.80%	25.83%	6.63%
Voting Age	6,792	4,527	1,781	377
		66.65%	26.22%	5.55%
County: Richmond GA				
Total:	206,607	68,397	119,970	11,449
		33.10%	58.07%	5.54%
Voting Age	160,899	58,403	87,930	8,445
		36.30%	54.65%	5.25%
County: Screven GA				
Total:	14,067	8,018	5,527	287
		57.00%	39.29%	2.04%
Voting Age	10,893	6,387	4,144	188
		58.63%	38.04%	1.73%
County: Tattnall GA				
Total:	22,842	13,825	6,331	2,303
		60.52%	27.72%	10.08%
Voting Age	17,654	11,020	4,886	1,419
		62.42%	27.68%	8.04%
County: Toombs GA				
Total:	27,030	16,007	7,402	3,044
		59.22%	27.38%	11.26%
Voting Age	20,261	12,810	5,036	1,978
		63.22%	24.86%	9.76%
County: Treutlen GA				
Total:	6,406	4,065	2,114	170
		63.46%	33.00%	2.65%
Voting Age	4,934	3,272	1,514	98
		66.32%	30.69%	1.99%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 12				
County: Warren GA				
Total:	5,215	1,974 37.85%	3,128 59.98%	53 1.02%
Voting Age	4,159	1,716 41.26%	2,360 56.74%	46 1.11%
County: Washington GA				
Total:	19,988	8,412 42.09%	10,969 54.88%	334 1.67%
Voting Age	15,709	6,944 44.20%	8,333 53.05%	235 1.50%
County: Wheeler GA				
Total:	7,471	4,157 55.64%	2,949 39.47%	272 3.64%
Voting Age	6,217	3,418 54.98%	2,561 41.19%	174 2.80%
County: Wilkes GA				
Total:	7,763	3,872 49.88%	3,422 44.08%	302 3.89%
Voting Age	6,160	3,257 52.87%	2,583 41.93%	189 3.07%
District 12 Total				
Total:	765,136	398,843 52.13%	294,961 38.55%	43,065 5.63%
Voting Age	588,119	321,394 54.65%	215,958 36.72%	28,628 4.87%
District 13				
County: Clayton GA				
Total:	259,676	23,324 8.98%	188,757 72.69%	36,049 13.88%
Voting Age	192,693	21,052 10.93%	138,553 71.90%	23,193 12.04%
County: Cobb GA				
Total:	125,029	35,498 28.39%	56,579 45.25%	27,993 22.39%
Voting Age	94,104	29,952 31.83%	41,953 44.58%	17,986 19.11%
County: Douglas GA				
Total:	101,267	26,463 26.13%	60,619 59.86%	11,835 11.69%
Voting Age	75,827	22,474 29.64%	43,695 57.62%	7,538 9.94%
County: Fayette GA				
Total:	16,509	5,071 30.72%	9,334 56.54%	1,415 8.57%
Voting Age	13,259	4,527 34.14%	7,282 54.92%	898 6.77%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Blkl	[Hispanic Origin]
District 13				
County: Fulton GA				
Total:	164,371	9,267 5.64%	146,286 89.00%	8,173 4.97%
Voting Age	123,766	8,240 6.66%	109,273 88.29%	5,487 4.43%
County: Henry GA				
Total:	98,285	25,483 25.93%	58,519 59.54%	8,089 8.23%
Voting Age	75,140	21,915 29.17%	42,907 57.10%	5,365 7.14%
District 13 Total				
Total:	765,137	125,106 16.35%	520,094 67.97%	93,554 12.23%
Voting Age	574,789	108,160 18.82%	383,663 66.75%	60,467 10.52%
District 14				
County: Catoosa GA				
Total:	67,872	59,280 87.34%	2,642 3.89%	2,341 3.45%
Voting Age	52,448	46,578 88.81%	1,684 3.21%	1,492 2.84%
County: Chattooga GA				
Total:	24,965	20,079 80.43%	2,865 11.48%	1,297 5.20%
Voting Age	19,416	15,885 81.81%	2,235 11.51%	733 3.78%
County: Cobb GA				
Total:	77,914	27,347 35.10%	38,183 49.01%	9,997 12.83%
Voting Age	58,910	23,036 39.10%	27,367 46.46%	6,479 11.00%
County: Dade GA				
Total:	16,251	14,786 90.99%	228 1.40%	364 2.24%
Voting Age	12,987	11,925 91.82%	140 1.08%	243 1.87%
County: Floyd GA				
Total:	98,584	67,747 68.72%	15,606 15.83%	11,466 11.63%
Voting Age	76,295	55,088 72.20%	11,064 14.50%	7,167 9.39%
County: Gordon GA				
Total:	57,544	43,317 75.28%	2,919 5.07%	8,957 15.57%
Voting Age	43,500	34,084 78.35%	1,939 4.46%	5,592 12.86%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_Bl	[Hispanic Origin]
District 14				
County: Murray GA				
Total:	39,973	32,164	556	5,914
		80.46%	1.39%	14.79%
Voting Age	30,210	25,146	321	3,696
		83.24%	1.06%	12.23%
County: Paulding GA				
Total:	168,661	108,444	41,296	12,564
		64.30%	24.48%	7.45%
Voting Age	123,998	83,066	28,164	7,974
		66.99%	22.71%	6.43%
County: Polk GA				
Total:	42,853	30,161	5,816	5,585
		70.38%	13.57%	13.03%
Voting Age	32,238	24,049	3,991	3,252
		74.60%	12.38%	10.09%
County: Walker GA				
Total:	67,654	59,654	3,664	1,685
		88.18%	5.42%	2.49%
Voting Age	52,794	47,292	2,454	1,066
		89.58%	4.65%	2.02%
County: Whitfield GA				
Total:	102,864	57,875	4,919	36,916
		56.26%	4.78%	35.89%
Voting Age	76,262	46,881	3,349	23,553
		61.47%	4.39%	30.88%
District 14 Total				
Total:	765,135	520,854	118,694	97,086
		68.07%	15.51%	12.69%
Voting Age	579,058	413,030	82,708	61,247
		71.33%	14.28%	10.58%

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT L-1

User:

Plan Name: Illustrative Plan

Plan Type:

Measures of Compactness Report

Tuesday, November 22, 2022

4:41 PM

	Reock	Polsby-Popper
Sum	N/A	N/A
Min	0.28	0.18
Max	0.51	0.39
Mean	0.43	0.27
Std. Dev.	0.07	0.06

District	Reock	Polsby-Popper
001	0.46	0.29
002	0.46	0.27
003	0.39	0.24
004	0.28	0.22
005	0.51	0.32
006	0.45	0.27
007	0.50	0.39
008	0.34	0.21
009	0.40	0.32
010	0.40	0.18
011	0.40	0.19

Measures of Compactness Report

Nov14_GA_congress

	Reock	Polsby-Popper
Sum	N/A	N/A
Min	0.28	0.18
Max	0.51	0.39
Mean	0.43	0.27
Std. Dev.	0.07	0.06
District	Reock	Polsby-Popper
012	0.50	0.28
013	0.44	0.29
014	0.48	0.34

Measures of Compactness Report

Nov14_GA_congress

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT L-2

User:

Plan Name: **Enacted Congress B-V-C**Plan Type: **Congress**

Measures of Compactness Report

Sunday, December 4, 2022

11:15 PM

	Reock	Polsby-Popper
Mean	0.45	0.26
Min	0.33	0.16
Max	0.55	0.37
Std. Dev.	0.07	0.06
Sum		

Higher Number is Better

Lower Number is Better

District	Reock	Polsby-Popper
1	0.40	0.23
2	0.44	0.31
3	0.55	0.28
4	0.54	0.27
5	0.52	0.37
6	0.49	0.27
7	0.45	0.26
8	0.33	0.16
9	0.36	0.30
10	0.52	0.27
11	0.50	0.28
12	0.41	0.19
13	0.38	0.16
14	0.45	0.31

Measures of Compactness Report

Enacted Congress B-V-C

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT L-3

User:

Plan Name: Enacted_2021_Plan

Plan Type:

Measures of Compactness Report

Tuesday, November 22, 2022

4:39 PM

	Reock	Polsby-Popper
Mean	0.44	0.27
Min	0.31	0.16
Max	0.56	0.39
Std. Dev.	0.07	0.06
Sum		

Higher Number is Better

Lower Number is Better

District	Reock	Polsby-Popper
1	0.46	0.29
2	0.46	0.27
3	0.46	0.28
4	0.31	0.25
5	0.51	0.32
6	0.42	0.20
7	0.50	0.39
8	0.34	0.21
9	0.38	0.25
10	0.56	0.28
11	0.48	0.21
12	0.50	0.28
13	0.38	0.16
14	0.43	0.37

Measures of Compactness Report

Ga_Congress_Enacted_2021_P

Measures of Compactness Summary

Reock	The measure is always between 0 and 1, with 1 being the most compact.
Polsby-Popper	The measure is always between 0 and 1, with 1 being the most compact.

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT M-1

User:

Plan Name: Illustrative Plan

Plan Type:

Political Subdivision Splits Between Districts

Saturday, November 19, 2022

8:40 PM

Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	15	County	0
Voting District	43	Voting District	1

Number of times a subdivision is split into multiple districts:

County	18
Voting District	44

County	Voting District	District	Population
<i>Split Counties:</i>			
Bibb GA		002	108,371
Bibb GA		008	48,975
Cherokee GA		011	122,400
Cherokee GA		014	144,220
Clayton GA		005	37,919
Clayton GA		013	259,676
Cobb GA		003	25,421
Cobb GA		006	452,386
Cobb GA		011	288,342
DeKalb GA		004	601,451
DeKalb GA		005	162,931
Effingham GA		001	47,208
Effingham GA		012	17,561
Fayette GA		006	4,143
Fayette GA		013	115,051
Fulton GA		005	564,287
Fulton GA		006	164,371
Fulton GA		007	92,558
Fulton GA		011	245,494
Gwinnett GA		007	672,579
Gwinnett GA		009	284,483
Hall GA		009	153,463
Hall GA		010	49,673
Houston GA		002	48,521
Houston GA		008	115,112
Lumpkin GA		010	29,598
Lumpkin GA		014	3,890
Muscogee GA		002	175,155
Muscogee GA		003	31,767
Newton GA		004	70,115
Newton GA		013	42,368
Wilkes GA		010	1,802
Wilkes GA		012	7,763

Political Subdivision Splits Between Districts

Nov14_GA_congress

County	Voting District	District	Population
<i>Split VTDs:</i>			
Bibb GA	HOWARD 2	002	0
Bibb GA	HOWARD 2	008	5,445
Bibb GA	VINEVILLE 6	002	2,527
Bibb GA	VINEVILLE 6	008	1,846
Cherokee GA	ARNOLD MILL	011	5,916
Cherokee GA	ARNOLD MILL	014	623
Cherokee GA	TOONIGH	011	373
Cherokee GA	TOONIGH	014	8,830
Cobb GA	Durham 01	003	987
Cobb GA	Durham 01	011	4,330
Cobb GA	Eastside 02	006	4,603
Cobb GA	Eastside 02	011	598
Cobb GA	Elizabeth 02	006	334
Cobb GA	Elizabeth 02	011	2,968
Cobb GA	Harrison 01	003	3,865
Cobb GA	Harrison 01	011	85
Cobb GA	Kemp 03	003	4,841
Cobb GA	Kemp 03	006	30
Cobb GA	Kennesaw 1A	006	2,972
Cobb GA	Kennesaw 1A	011	1,471
Cobb GA	Kennesaw 3A	006	3,540
Cobb GA	Kennesaw 3A	011	5,962
Cobb GA	Lost Mountain 03	003	31
Cobb GA	Lost Mountain 03	006	6,841
Cobb GA	Pine Mountain 02	003	23
Cobb GA	Pine Mountain 02	006	967
Cobb GA	Pine Mountain 02	011	2,986
Cobb GA	Sewell Mill 03	006	4,245
Cobb GA	Sewell Mill 03	011	2,692
DeKalb GA	Avondale (AVO)	004	341
DeKalb GA	Avondale (AVO)	005	3,226
DeKalb GA	North Decatur	004	2,220
DeKalb GA	North Decatur	005	1,670
DeKalb GA	Scott	004	2,482
DeKalb GA	Scott	005	1,434
Effingham GA	4B	001	2,759
Effingham GA	4B	012	160
Fayette GA	RAREOVER	006	2,062
Fayette GA	RAREOVER	013	1,650
Fayette GA	SANDY CREEK	006	2,081
Fayette GA	SANDY CREEK	013	4,627
Fulton GA	11C	005	3,058
Fulton GA	11C	006	700
Fulton GA	CP051	005	79
Fulton GA	CP051	006	1,718
Fulton GA	RW21	007	4,138

Political Subdivison Splits Between Districts

Nov14_GA_congress

County	Voting District	District	Population
Fulton GA	RW21	011	164
Fulton GA	RW22A	007	11
Fulton GA	RW22A	011	7,186
Fulton GA	SC02	005	220
Fulton GA	SC02	006	773
Fulton GA	SS01	007	1,550
Fulton GA	SS01	011	3,803
Fulton GA	SS03	005	1,254
Fulton GA	SS03	011	900
Fulton GA	SS04	005	219
Fulton GA	SS04	011	5,019
Fulton GA	SS08C	005	438
Fulton GA	SS08C	011	594
Fulton GA	SS18A	005	472
Fulton GA	SS18A	011	309
Gwinnett GA	SUWANEE G	007	815
Gwinnett GA	SUWANEE G	009	5,138
Hall GA	GAINESVILLE I	009	6,606
Hall GA	GAINESVILLE I	010	181
Hall GA	GLADE	009	25
Hall GA	GLADE	010	6,845
Hall GA	WHELCHER	009	366
Hall GA	WHELCHER	010	5,685
Lumpkin GA	DAHLONEGA	010	29,598
Lumpkin GA	DAHLONEGA	014	3,890
Muscogee GA	COLUMBUS TECH	002	7,876
Muscogee GA	COLUMBUS TECH	003	1,271
Muscogee GA	CORNERSTONE	002	10,259
Muscogee GA	CORNERSTONE	003	192
Muscogee GA	ST PAUL/CLUBVIEW	002	6,958
Muscogee GA	ST PAUL/CLUBVIEW	003	1,082
Newton GA	BEAVERDAM	004	101
Newton GA	BEAVERDAM	013	7,174
Newton GA	CROWELL	004	3,263
Newton GA	CROWELL	013	3,967
Newton GA	FAIRVIEW	004	856
Newton GA	FAIRVIEW	013	3,443
Wilkes GA	3174A - COURTHOUSE	010	106
Wilkes GA	3174A - COURTHOUSE	012	1,114
Wilkes GA	3174B - TIGNALL SCHOOL	010	774
Wilkes GA	3174B - TIGNALL SCHOOL	012	407

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT M-2

User:

Plan Name: **Enacted Congress B-V-C**Plan Type: **Congress**

Political Subdivison Splits Between Districts

Sunday, December 4, 2022

11:19 PM

Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	16	County	0
Voting District	64	Voting District	21

Number of times a subdivision is split into multiple districts:

County	22
Voting District	64

County	Voting District	District	Population
<i>Split Counties:</i>			
Bibb GA		2	109,356
Bibb GA		8	47,990
Clarke GA		9	17,724
Clarke GA		10	110,947
Clayton GA		5	117,339
Clayton GA		13	180,256
Cobb GA		6	193,750
Cobb GA		11	379,820
Cobb GA		13	192,579
Columbia GA		10	20,422
Columbia GA		12	135,588
DeKalb GA		4	393,310
DeKalb GA		5	174,792
DeKalb GA		6	196,280
Effingham GA		1	39,543
Effingham GA		12	25,226
Fayette GA		3	99,867
Fayette GA		13	19,327
Forsyth GA		7	183,316
Forsyth GA		9	67,967
Fulton GA		5	495,995
Fulton GA		6	375,763
Fulton GA		11	47,174
Fulton GA		13	147,778
Gwinnett GA		4	197,348
Gwinnett GA		7	676,124
Gwinnett GA		10	83,590
Henry GA		3	78,718
Henry GA		10	53,255
Henry GA		13	108,739
Lowndes GA		1	6,307
Lowndes GA		8	111,944
Muscogee GA		2	156,252

Political Subdivision Splits Between Districts

Enacted Congress B-V-C

County	Voting District	District	Population
Muscogee GA		3	50,670
Newton GA		4	89,533
Newton GA		10	22,950
Pickens GA		9	21,805
Pickens GA		14	11,411
<i>Split VTDs:</i>			
Bibb GA	HOWARD 2	2	736
Bibb GA	HOWARD 2	8	4,709
Cobb GA	Chattahoochee 01	6	5,702
Cobb GA	Chattahoochee 01	11	4,425
Cobb GA	Dobbins 01	11	13,401
Cobb GA	Dobbins 01	13	0
Cobb GA	East Piedmont 01	6	451
Cobb GA	East Piedmont 01	11	3,471
Cobb GA	Fair Oaks 04	11	5,624
Cobb GA	Fair Oaks 04	13	7,076
Cobb GA	Macland 01	11	0
Cobb GA	Macland 01	13	5,734
Cobb GA	Marietta 5A	6	1,457
Cobb GA	Marietta 5A	11	2,877
Cobb GA	Marietta 5B	6	0
Cobb GA	Marietta 5B	11	4,761
Cobb GA	Marietta 6A	6	1,493
Cobb GA	Marietta 6A	11	3,061
Cobb GA	Marietta 7A	6	1,271
Cobb GA	Marietta 7A	11	5,640
Cobb GA	McEachern	11	0
Cobb GA	McEachern	13	4,563
Cobb GA	Nickajack 01	11	6,126
Cobb GA	Nickajack 01	13	0
Cobb GA	Oakdale 01	11	4,545
Cobb GA	Oakdale 01	13	66
Cobb GA	Oregon 04	11	0
Cobb GA	Oregon 04	13	6,498
Cobb GA	Palmer 01	6	1,900
Cobb GA	Palmer 01	11	1,785
Cobb GA	Powers Ferry 01	6	464
Cobb GA	Powers Ferry 01	11	4,963
Cobb GA	Smyrna 3A	11	3,566
Cobb GA	Smyrna 3A	13	6,226
Cobb GA	Smyrna 4A	11	10
Cobb GA	Smyrna 4A	13	8,198
Cobb GA	Smyrna 5A	11	0
Cobb GA	Smyrna 5A	13	6,989
Cobb GA	Smyrna 6A	11	7,594
Cobb GA	Smyrna 6A	13	497
Cobb GA	Smyrna 7A	11	691

Political Subdivison Splits Between Districts

Enacted Congress B-V-C

County	Voting District	District	Population
Cobb GA	Smyrna 7A	13	7,904
Columbia GA	HARLEM BRANCH LIBRARY	10	2,566
Columbia GA	HARLEM BRANCH LIBRARY	12	3,473
Columbia GA	KIOKEE BAPT CHURCH	10	1,046
Columbia GA	KIOKEE BAPT CHURCH	12	2,544
DeKalb GA	Avondale High	4	2,174
DeKalb GA	Avondale High	5	1,676
DeKalb GA	Clairmont Road	4	4,525
DeKalb GA	Clairmont Road	5	0
DeKalb GA	Glennwood (DEC)	4	1,515
DeKalb GA	Glennwood (DEC)	5	1,765
DeKalb GA	Lakeside High	4	10
DeKalb GA	Lakeside High	6	4,534
DeKalb GA	Oak Grove Elem	4	3,231
DeKalb GA	Oak Grove Elem	6	0
DeKalb GA	Oak View Elem	4	10
DeKalb GA	Oak View Elem	5	6,304
DeKalb GA	Scott	4	3,914
DeKalb GA	Scott	5	2
DeKalb GA	Wadsworth	4	2,421
DeKalb GA	Wadsworth	5	923
DeKalb GA	Winnona Park (DEC)	4	18
DeKalb GA	Winnona Park (DEC)	5	2,866
Effingham GA	1B	1	2,790
Effingham GA	1B	12	1,605
Effingham GA	4B	1	959
Effingham GA	4B	12	1,960
Fayette GA	DOGWOOD	3	2,385
Fayette GA	DOGWOOD	13	1,354
Fayette GA	FAYETTEVILLE EAST	3	2,785
Fayette GA	FAYETTEVILLE EAST	13	15
Fayette GA	SANDY CREEK	3	5,259
Fayette GA	SANDY CREEK	13	1,449
Fayette GA	WILLOW POND	3	4,167
Fayette GA	WILLOW POND	13	0
Forsyth GA	BROWNS BRIDGE	7	6,555
Forsyth GA	BROWNS BRIDGE	9	6,362
Forsyth GA	HEARDSVILLE	7	22
Forsyth GA	HEARDSVILLE	9	12,978
Forsyth GA	MIDWAY	7	30,335
Forsyth GA	MIDWAY	9	91
Forsyth GA	OTWELL	7	15,056
Forsyth GA	OTWELL	9	3,404
Fulton GA	CP051	5	1,789
Fulton GA	CP051	13	8

Political Subdivision Splits Between Districts

Enacted Congress B-V-C

County	Voting District	District	Population
Fulton GA	EP04B	5	0
Fulton GA	EP04B	13	3,706
Fulton GA	SC19B	5	0
Fulton GA	SC19B	13	2,306
Gwinnett GA	BERKSHIRE J	4	3,703
Gwinnett GA	BERKSHIRE J	7	40
Gwinnett GA	CATES D	4	4,733
Gwinnett GA	CATES D	7	1,037
Gwinnett GA	CATES H	4	6,264
Gwinnett GA	CATES H	7	0
Gwinnett GA	DUNCANS D	7	0
Gwinnett GA	DUNCANS D	10	10,195
Gwinnett GA	HOG MOUNTAIN B	7	6,314
Gwinnett GA	HOG MOUNTAIN B	10	0
Gwinnett GA	PUCKETTS D	7	5,310
Gwinnett GA	PUCKETTS D	10	0
Gwinnett GA	ROCKYCREEK B	7	7,660
Gwinnett GA	ROCKYCREEK B	10	0
Henry GA	EAST LAKE	3	0
Henry GA	EAST LAKE	10	4,457
Henry GA	LAKE HAVEN	3	5,788
Henry GA	LAKE HAVEN	10	0
Henry GA	MCDONOUGH CENTRAL	3	5,969
Henry GA	MCDONOUGH CENTRAL	10	0
Henry GA	UNITY GROVE	3	3,615
Henry GA	UNITY GROVE	10	3,236
Lowndes GA	NAYLOR	1	1,130
Lowndes GA	NAYLOR	8	654
Lowndes GA	TRINITY	1	5,177
Lowndes GA	TRINITY	8	16,170
Muscogee GA	EPWORTH UMC	2	395
Muscogee GA	EPWORTH UMC	3	7,528
Muscogee GA	GENTIAN/REESE @LDS	2	9,501
Muscogee GA	GENTIAN/REESE @LDS	3	0
Muscogee GA	ST PAUL/CLUBVIEW	2	5,762
Muscogee GA	ST PAUL/CLUBVIEW	3	2,278
Newton GA	ALCOVY	4	6,166
Newton GA	ALCOVY	10	549
Newton GA	ROCKY PLAINS	4	674
Newton GA	ROCKY PLAINS	10	4,537
Pickens GA	TATE	9	1,211
Pickens GA	TATE	14	2,585

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT M-3

User:

Plan Name: **Enacted_2021_Plan**

Plan Type:

Political Subdivison Splits Between Districts

Tuesday, November 22, 2022

5:21 PM

Split Counts

Number of subdivisions split into more than one district: Number of splits involving no population:

County	15	County	0
Voting District	47	Voting District	1

Number of times a subdivision is split into multiple districts:

County	21
Voting District	47

County	Voting District	District	Population
<i>Split Counties:</i>			
Bibb GA		2	108,371
Bibb GA		8	48,975
Cherokee GA		6	40,881
Cherokee GA		11	225,739
Clayton GA		5	37,919
Clayton GA		13	259,676
Cobb GA		6	165,925
Cobb GA		11	397,281
Cobb GA		13	125,029
Cobb GA		14	77,914
DeKalb GA		4	601,451
DeKalb GA		5	162,931
Douglas GA		3	42,970
Douglas GA		13	101,267
Effingham GA		1	47,208
Effingham GA		12	17,561
Fayette GA		3	102,685
Fayette GA		13	16,509
Fulton GA		5	564,287
Fulton GA		6	245,494
Fulton GA		7	92,558
Fulton GA		13	164,371
Gwinnett GA		6	34,755
Gwinnett GA		7	672,579
Gwinnett GA		9	249,728
Henry GA		3	23,975
Henry GA		10	118,452
Henry GA		13	98,285
Houston GA		2	48,521
Houston GA		8	115,112
Muscogee GA		2	175,155
Muscogee GA		3	31,767
Newton GA		4	70,114

Political Subdivision Splits Between Districts

Ga_Congress_Enacted_2021_P

County	Voting District	District	Population
Newton GA		10	42,369
Wilkes GA		10	1,802
Wilkes GA		12	7,763
<i>Split VTDs:</i>			
Bibb GA	HOWARD 2	2	0
Bibb GA	HOWARD 2	8	5,445
Bibb GA	VINEVILLE 6	2	2,527
Bibb GA	VINEVILLE 6	8	1,846
Cherokee GA	HICKORY FLAT	6	2,468
Cherokee GA	HICKORY FLAT	11	7,593
Cobb GA	East Piedmont 01	6	3,511
Cobb GA	East Piedmont 01	11	411
Cobb GA	Eastside 02	6	459
Cobb GA	Eastside 02	11	4,742
Cobb GA	Elizabeth 01	6	177
Cobb GA	Elizabeth 01	11	5,693
Cobb GA	Kemp 02	11	2,051
Cobb GA	Kemp 02	14	3,151
Cobb GA	Mableton 01	13	5,999
Cobb GA	Mableton 01	14	1,103
Cobb GA	Mableton 02	13	4,152
Cobb GA	Mableton 02	14	1,531
Cobb GA	Marietta 5A	6	106
Cobb GA	Marietta 5A	11	4,228
Cobb GA	Marietta 5B	6	2,828
Cobb GA	Marietta 5B	11	1,933
Cobb GA	Marietta 6A	6	1,532
Cobb GA	Marietta 6A	11	3,022
Cobb GA	Nickajack 01	11	6,108
Cobb GA	Nickajack 01	13	18
Cobb GA	Oakdale 01	11	3,804
Cobb GA	Oakdale 01	13	807
Cobb GA	Oregon 05	11	3,496
Cobb GA	Oregon 05	14	1,409
Cobb GA	Palmer 01	6	1,900
Cobb GA	Palmer 01	11	1,785
Cobb GA	Sewell Mill 03	6	5,051
Cobb GA	Sewell Mill 03	11	1,886
Cobb GA	Smyrna 3A	11	6,191
Cobb GA	Smyrna 3A	13	3,601
Cobb GA	Smyrna 5A	11	1,557
Cobb GA	Smyrna 5A	13	5,432
Cobb GA	Smyrna 7A	11	366
Cobb GA	Smyrna 7A	13	8,229
DeKalb GA	Avondale (AVO)	4	341
DeKalb GA	Avondale (AVO)	5	3,226
DeKalb GA	North Decatur	4	2,220

Political Subdivison Splits Between Districts

Ga_Congress_Enacted_2021_P

County	Voting District	District	Population
DeKalb GA	North Decatur	5	1,670
DeKalb GA	Scott	4	2,482
DeKalb GA	Scott	5	1,434
Douglas GA	PRAYS MILL GYM	3	7,167
Douglas GA	PRAYS MILL GYM	13	324
Douglas GA	ST JULIANS EPISCOPAL	3	2,125
Douglas GA	ST JULIANS EPISCOPAL	13	1,028
Effingham GA	4B	1	2,759
Effingham GA	4B	12	160
Fulton GA	11C	5	3,058
Fulton GA	11C	13	700
Fulton GA	CP051	5	79
Fulton GA	CP051	13	1,718
Fulton GA	RW21	6	164
Fulton GA	RW21	7	4,138
Fulton GA	RW22A	6	7,186
Fulton GA	RW22A	7	11
Fulton GA	SC02	5	220
Fulton GA	SC02	13	773
Fulton GA	SS01	6	3,803
Fulton GA	SS01	7	1,550
Fulton GA	SS03	5	1,254
Fulton GA	SS03	6	900
Fulton GA	SS04	5	219
Fulton GA	SS04	6	5,019
Fulton GA	SS08C	5	438
Fulton GA	SS08C	6	594
Fulton GA	SS18A	5	472
Fulton GA	SS18A	6	309
Gwinnett GA	SUWANEE G	7	815
Gwinnett GA	SUWANEE G	9	5,138
Muscogee GA	COLUMBUS TECH	2	7,876
Muscogee GA	COLUMBUS TECH	3	1,271
Muscogee GA	CORNERSTONE	2	10,259
Muscogee GA	CORNERSTONE	3	192
Muscogee GA	ST PAUL/CLUBVIEW	2	6,958
Muscogee GA	ST PAUL/CLUBVIEW	3	1,082
Newton GA	ALCOVY	4	6,251
Newton GA	ALCOVY	10	464
Newton GA	CITY POND	4	2,372
Newton GA	CITY POND	10	712
Newton GA	DOWNS	4	114
Newton GA	DOWNS	10	8,507
Newton GA	LIVINGSTON	4	4,260
Newton GA	LIVINGSTON	10	2,077
Newton GA	OXFORD	4	1,737
Newton GA	OXFORD	10	2,304

Political Subdivison Splits Between Districts

Ga_Congress_Enacted_2021_P

County	Voting District	District	Population
Wilkes GA	3174A - COURTHOUSE	10	106
Wilkes GA	3174A - COURTHOUSE	12	1,114
Wilkes GA	3174B - TIGNALL SCHOOL	10	774
Wilkes GA	3174B - TIGNALL SCHOOL	12	407

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT M-4

User:

Plan Name: Illustrative Plan

Plan Type:

Communities of Interest (Condensed)

Tuesday, November 22, 2022

8:19 AM

Whole City/Town : 494**City/Town Splits: 84****Zero Population City/Town Splits: 6**

District	City/Town	Population	% Pop	District	City/Town	Population	% Pop
001	Guyton	285	12.45%	007	Alpharetta	4,390	6.67%
001	Springfield	18	0.67%	007	Suwanee	346	1.66%
002	Barwick	258	71.07%	007	Loganville	3,155	22.33%
002	Pavo	380	61.09%	007	Lawrenceville	29,016	94.73%
002	Perry	90	0.44%	007	Dacula	6,882	100.00%
002	Centerville	8,228	100.00%	008	Barwick	105	28.93%
002	Warner	31,703	39.48%	008	Pavo	242	38.91%
	Robins			008	Perry	20,534	99.56%
002	Columbus	175,155	84.65%	008	McRae-Helena	6,253	100.00%
002	Manchester	92	2.57%				
003	Villa Rica	9,706	57.20%	008	Centerville	0	0.00%
003	Chattahoochee Hills	2	0.07%	008	Warner	48,605	60.52%
					Robins		
003	Palmetto	561	11.06%	008	Allentown	190	97.44%
003	Columbus	31,767	15.35%	008	Scotland	166	95.95%
003	Manchester	3,492	97.43%	009	Auburn	225	3.00%
003	Taylorville	35	13.89%	009	Braselton	11,396	85.03%
004	Social Circle	5	0.10%	009	Gainesville	39,707	93.88%
004	Avondale Estates	341	9.56%	009	Gillsville	212	69.28%
				009	Maysville	834	44.67%
004	Atlanta	42	0.01%	009	Suwanee	20,440	98.34%
005	Riverdale	0	0.00%	009	Lawrenceville	1,613	5.27%
005	Forest Park	14,165	71.07%	009	Dacula	0	0.00%
005	Avondale Estates	3,226	90.44%	010	Social Circle	4,969	99.90%
				010	Auburn	7,270	97.00%
005	Sandy Springs	52,999	49.04%	010	Braselton	2,007	14.97%
				010	Gainesville	2,589	6.12%
005	South Fulton	3,731	3.47%	010	Gillsville	94	30.72%
005	College Park	8,958	64.31%	010	Maysville	1,033	55.33%
005	East Point	34,652	90.34%	010	Loganville	10,972	77.67%
005	Atlanta	497,973	99.85%	011	Sandy Springs	53,531	49.53%
006	Villa Rica	7,264	42.80%				
006	Chattahoochee Hills	2,948	99.93%	011	Roswell	88,668	95.51%
				011	Kennesaw	26,524	80.29%
006	Palmetto	4,510	88.94%	011	Alpharetta	61,428	93.33%
006	Tyrone	2,290	29.90%	011	Taylorville	217	86.11%
006	South Fulton	103,705	96.53%	011	Marietta	0	0.00%
006	College Park	4,972	35.69%	011	Woodstock	33,557	95.70%
006	East Point	3,706	9.66%	011	Holly Springs	45	0.28%
006	Atlanta	700	0.14%	012	McRae-Helena	0	0.00%
006	Kennesaw	6,512	19.71%				
006	Marietta	60,972	100.00%	012	Allentown	5	2.56%
007	Sandy Springs	1,550	1.43%	012	Scotland	7	4.05%
				012	Guyton	2,004	87.55%
007	Roswell	4,165	4.49%				

Communities of Interest (Condensed)

Nov14_GA_congress

District	City/Town	Population	% Pop	District	City/Town	Population	% Pop
012	Springfield	2,685	99.33%				
013	Tyrone	5,368	70.10%				
013	Riverdale	15,129	100.00%				
013	Forest Park	5,767	28.93%				
014	Woodstock	1,508	4.30%				
014	Holly Springs	16,168	99.72%				

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT M-5

User:

Plan Name: Enacted Congress B-V-C

Plan Type: Congress

Communities of Interest (Condensed)

Thursday, December 1, 2022

10:42 AM

Whole City/Town : 491**City/Town Splits: 91****Zero Population City/Town Splits: 6**

District	City/Town	Population	% Pop	District	City/Town	Population	% Pop
1	Vernonburg	139	100.00%	2	Roberta	813	100.00%
1	Pooler	25,711	100.00%	2	Lilly	129	100.00%
1	Garden City	10,289	100.00%	2	Pinehurst	309	100.00%
1	Port Wentworth	10,878	100.00%	2	Unadilla	3,118	100.00%
1	Thunderbolt	2,556	100.00%	2	Perry	90	0.44%
1	Rincon	10,934	100.00%	2	Fort Valley	8,780	100.00%
1	Tybee Island	3,114	100.00%	2	Warner	565	0.70%
1	Kingsland	18,337	100.00%	2	Robins		
1	St. Marys	18,256	100.00%	2	Byron	5,702	100.00%
1	Woodbine	1,062	100.00%	2	Bluffton	113	100.00%
1	Waycross	13,942	100.00%	2	Edison	1,230	100.00%
1	Homeland	886	100.00%	2	Cuthbert	3,143	100.00%
1	Folkston	4,464	100.00%	2	Morgan	1,741	100.00%
1	Hoboken	480	100.00%	2	Leary	524	100.00%
1	Blackshear	3,506	100.00%	2	Shellman	861	100.00%
1	Patterson	749	100.00%	2	Dawson	4,414	100.00%
1	Offerman	450	100.00%	2	Parrott	120	100.00%
1	Nahunta	1,013	100.00%	2	Lumpkin	891	100.00%
1	Alma	3,433	100.00%	2	Richland	1,370	100.00%
1	Screven	769	100.00%	2	Buena Vista	1,585	100.00%
1	Odum	463	100.00%	2	Albany	69,647	100.00%
1	Jesup	9,809	100.00%	2	Sasser	287	100.00%
1	Brunswick	15,210	100.00%	2	Bronwood	334	100.00%
1	Darien	1,460	100.00%	2	Leesburg	3,480	100.00%
1	Ludowici	1,590	100.00%	2	Smithville	593	100.00%
1	Gumbranch	235	100.00%	2	Leslie	344	100.00%
1	Walthourville	3,680	100.00%	2	De Soto	124	100.00%
1	Allenhurst	816	100.00%	2	Plains	573	100.00%
1	Hinesville	34,891	100.00%	2	Ellaville	1,595	100.00%
1	Flemington	825	100.00%	2	Jakin	131	100.00%
1	Riceboro	615	100.00%	2	Bainbridge	14,468	100.00%
1	Midway	2,141	100.00%	2	Attapulcus	454	100.00%
1	Richmond Hill	16,633	100.00%	2	Climax	276	100.00%
1	Pembroke	2,513	100.00%	2	Donalsonville	2,833	100.00%
1	Bloomingdale	2,790	100.00%	2	Iron City	312	100.00%
1	Savannah	147,780	100.00%	2	Brinson	217	100.00%
1	Du Pont	134	100.00%	2	Colquitt	2,001	100.00%
1	Fargo	250	100.00%	2	Blakely	5,371	100.00%
1	Homerville	2,344	100.00%	2	Damascus	212	100.00%
1	Argyle	190	100.00%	2	Arlington	1,209	100.00%
2	Butler	1,881	100.00%	2	Whigham	428	100.00%
2	Reynolds	926	100.00%	2	Cairo	10,179	100.00%
				2	Pelham	3,507	100.00%
				2	Newton	602	100.00%

Communities of Interest (Condensed)

Enacted Congress B-V-C

District	City/Town	Population	% Pop	District	City/Town	Population	% Pop
2	Camilla	5,187	100.00%	3	Locust Grove	8,947	100.00%
2	Baconton	856	100.00%	3	Mount Zion	1,766	100.00%
2	Meigs	38	4.09%	3	Carrollton	26,738	100.00%
2	Sale City	354	100.00%	3	Bremen	65	0.90%
2	Fort Gaines	995	100.00%	3	Temple	5,026	98.76%
2	Americus	16,230	100.00%	3	Ephesus	471	100.00%
2	Ideal	407	100.00%	3	Bowdon	2,161	100.00%
2	Andersonville	237	100.00%	3	Franklin	950	100.00%
2	Dooling	68	100.00%	3	Centralhatche e	348	100.00%
2	Byromville	422	100.00%	3	Roopville	231	100.00%
2	Oglethorpe	995	100.00%	3	West Point	3,719	100.00%
2	Montezuma	3,047	100.00%	3	LaGrange	30,858	100.00%
2	Marshallville	1,048	100.00%	3	Columbus	50,670	24.49%
2	Columbus	156,252	75.51%	3	Hamilton	1,680	100.00%
2	Geneva	75	100.00%	3	Waverly Hall	638	100.00%
2	Junction City	138	100.00%	3	Pine	1,216	100.00%
2	Talbotton	742	100.00%	3	Mountain		
2	Manchester	92	2.57%	3	Shiloh	402	100.00%
2	Woodland	305	100.00%	3	Warm	465	100.00%
2	Cordele	10,220	100.00%	3	Springs		
2	Arabi	447	100.00%	3	Manchester	3,492	97.43%
2	Vienna	2,928	100.00%	3	Woodbury	908	100.00%
3	Villa Rica	9,706	57.20%	3	Molena	392	100.00%
3	Chattahooch ee Hills	2	0.07%	3	Hogansville	3,267	100.00%
3	Newnan	42,549	100.00%	3	Lone Oak	114	100.00%
3	Gay	110	100.00%	3	Grantville	3,103	100.00%
3	Haralson	172	100.00%	3	Greenville	794	100.00%
3	Concord	378	100.00%	3	Luthersville	776	100.00%
3	Sharpsburg	327	100.00%	3	Moreland	382	100.00%
3	Turin	347	100.00%	3	Whitesburg	596	100.00%
3	Senoia	5,016	100.00%	4	Covington	14,144	99.66%
3	Peachtree City	38,244	100.00%	4	Oxford	2,308	100.00%
3	Palmetto	561	11.06%	4	Decatur	6,020	24.15%
3	Tyrone	7,658	100.00%	4	Avondale Estates	3,567	100.00%
3	Brooks	568	100.00%	4	Clarkston	14,756	100.00%
3	Woolsey	206	100.00%	4	Pine Lake	752	100.00%
3	Fayetteville	18,291	96.49%	4	Stone	6,703	100.00%
3	Thomaston	9,816	100.00%	4	Mountain		
3	Yatesville	394	100.00%	4	Tucker	24,906	67.30%
3	Zebulon	1,225	100.00%	4	Stonecrest	59,194	100.00%
3	Meansville	266	100.00%	4	Lithonia	2,662	100.00%
3	Williamson	681	100.00%	4	Conyers	17,305	100.00%
3	Aldora	0	0.00%	4	Porterdale	1,799	100.00%
3	Barnesville	6,292	100.00%	4	Lilburn	3,442	23.73%
3	Milner	772	100.00%	4	Snellville	11,849	57.59%
3	Griffin	23,478	100.00%	4	Loganville	2,314	16.38%
3	Orchard Hill	219	100.00%	5	Riverdale	0	0.00%
3	Sunny Side	203	100.00%	5	Hapeville	6,553	100.00%
3	Hampton	4,857	58.04%	5	Forest Park	19,932	100.00%
3	Stockbridge	0	0.00%	5	Morrow	6,074	92.46%
3	McDonough	19,568	67.36%	5	Lake City	2,952	100.00%

Communities of Interest (Condensed)

Enacted Congress B-V-C

District	City/Town	Population	% Pop	District	City/Town	Population	% Pop
5	Decatur	18,908	75.85%	8	Ocilla	3,498	100.00%
5	Brookhaven	10,087	18.29%	8	Fitzgerald	9,006	100.00%
5	South Fulton	17,214	16.02%	8	Jacksonville	111	100.00%
5	College Park	10,856	77.93%	8	Abbeville	2,685	100.00%
5	East Point	34,652	90.34%	8	Rhine	295	100.00%
5	Atlanta	466,826	93.61%	8	Eastman	5,658	100.00%
6	Sandy Springs	92,792	85.85%	8	Cochran	5,026	100.00%
6	Brookhaven	45,074	81.71%	8	Chester	525	100.00%
6	Dunwoody	51,683	100.00%	8	Milan	613	100.00%
6	Chamblee	30,164	100.00%	8	Chauncey	289	100.00%
6	Roswell	92,833	100.00%	8	McRae-Helena	6,253	100.00%
6	Doraville	10,623	100.00%	8	Centerville	8,228	100.00%
6	Tucker	12,099	32.70%	8	Warner	79,743	99.30%
6	Atlanta	3	0.00%	8	Robins		
6	Alpharetta	65,818	100.00%	8	Gray	3,436	100.00%
6	Johns Creek	82,453	100.00%	8	Danville	165	100.00%
6	Milton	41,296	100.00%	8	Jeffersonville	977	100.00%
6	Marietta	7,962	13.06%	8	Allentown	190	97.44%
6	Mountain Park	571	97.94%	8	Gordon	1,783	100.00%
7	Norcross	17,209	100.00%	8	Ivey	1,037	100.00%
7	Peachtree Corners	42,243	100.00%	8	Irwinton	531	100.00%
7	Braselton	10	0.07%	8	McIntyre	575	100.00%
7	Berkeley Lake	2,054	100.00%	8	Toomsboro	383	100.00%
7	Duluth	31,873	100.00%	8	Warwick	504	100.00%
7	Lilburn	11,060	76.27%	8	Thomasville	18,881	100.00%
7	Suwanee	20,786	100.00%	8	Ochlocknee	672	100.00%
7	Snellville	8,724	42.41%	8	Meigs	890	95.91%
7	Grayson	4,730	100.00%	8	Doerun	738	100.00%
7	Loganville	841	5.95%	8	Sylvester	5,644	100.00%
7	Lawrenceville	30,629	100.00%	8	Poulan	760	100.00%
7	Dacula	0	0.00%	8	Sumner	445	100.00%
7	Cumming	7,318	100.00%	8	Ty Ty	641	100.00%
7	Sugar Hill	25,076	100.00%	8	Sycamore	692	100.00%
7	Buford	14,479	84.46%	8	Ashburn	4,291	100.00%
7	Rest Haven	20	44.44%	8	Tifton	17,045	100.00%
8	Culloden	200	100.00%	8	Pitts	252	100.00%
8	Forsyth	4,384	100.00%	8	Rebecca	208	100.00%
8	Boston	1,207	100.00%	8	Rochelle	1,167	100.00%
8	Barwick	363	100.00%	8	Lumber City	967	100.00%
8	Quitman	4,064	100.00%	8	Scotland	166	95.95%
8	Coolidge	528	100.00%	8	Ellenton	210	100.00%
8	Moultrie	14,638	100.00%	8	Hahira	3,384	100.00%
8	Pavo	622	100.00%	8	Cecil	284	100.00%
8	Funston	402	100.00%	8	Sparks	2,043	100.00%
8	Norman Park	963	100.00%	8	Adel	5,571	100.00%
8	Morven	506	100.00%	8	Omega	1,318	100.00%
8	Berlin	511	100.00%	8	Lenox	752	100.00%
8	Perry	20,534	99.56%	8	Remerton	1,334	100.00%
8	Pineview	454	100.00%	8	Valdosta	55,378	100.00%
8	Hawkinsville	3,980	100.00%	8	Lake Park	932	100.00%
				8	Dasher	890	100.00%
				8	Ray City	956	100.00%

Communities of Interest (Condensed)

Enacted Congress B-V-C

District	City/Town	Population	% Pop	District	City/Town	Population	% Pop
8	Nashville	4,947	100.00%	9	Hoschton	2,666	100.00%
8	Enigma	1,058	100.00%	9	Oakwood	4,822	100.00%
8	Alapaha	481	100.00%	9	Gainesville	42,296	100.00%
8	Lakeland	2,875	100.00%	9	Talmo	257	100.00%
8	Willacoochee	1,240	100.00%	9	Pendergrass	1,692	100.00%
8	Pearson	1,821	100.00%	9	Gillsville	306	100.00%
9	Hartwell	4,470	100.00%	9	Clermont	1,021	100.00%
9	Helen	531	100.00%	9	Cleveland	3,514	100.00%
9	Young Harris	1,098	100.00%	9	Lula	2,822	100.00%
9	Hiawassee	981	100.00%	9	Jefferson	13,233	100.00%
9	Clarksville	1,911	100.00%	9	Maysville	1,867	100.00%
9	Tallulah Falls	199	100.00%	9	Homer	1,264	100.00%
9	Tiger	422	100.00%	9	Nicholson	1,808	100.00%
9	Clayton	2,003	100.00%	9	Commerce	7,387	100.00%
9	Mountain City	904	100.00%	9	Alto	970	100.00%
9	Dillard	337	100.00%	9	Baldwin	3,629	100.00%
9	Sky Valley	482	100.00%	9	Nelson	549	47.95%
9	Cornelia	4,503	100.00%	9	Buford	2,665	15.54%
9	Mount Airy	1,391	100.00%	9	Rest Haven	25	55.56%
9	Demorest	2,022	100.00%	10	Sharon	104	100.00%
9	Winterville	1,201	100.00%	10	Washington	3,754	100.00%
9	Hull	230	100.00%	10	Tignall	485	100.00%
9	Colbert	630	100.00%	10	Lincolnton	1,480	100.00%
9	Comer	1,512	100.00%	10	Greensboro	3,648	100.00%
9	Carlton	263	100.00%	10	Woodville	264	100.00%
9	Ila	350	100.00%	10	Maxeys	198	100.00%
9	Danielsville	654	100.00%	10	Arnoldsville	431	100.00%
9	Franklin Springs	1,155	100.00%	10	Lexington	203	100.00%
9	Royston	2,649	100.00%	10	Crawford	821	100.00%
9	Carnesville	713	100.00%	10	Union Point	1,597	100.00%
9	Toccoa	9,133	100.00%	10	Crawfordville	479	100.00%
9	Canon	643	100.00%	10	Rayle	158	100.00%
9	Lavonia	2,143	100.00%	10	McDonough	9,483	32.64%
9	Martin	336	100.00%	10	Jackson	5,557	100.00%
9	Avalon	233	100.00%	10	Flovilla	643	100.00%
9	Bowman	872	100.00%	10	Jenkinsburg	391	100.00%
9	Elberton	4,640	100.00%	10	Covington	48	0.34%
9	Bowersville	444	100.00%	10	Walnut Grove	1,322	100.00%
9	Flowery Branch	9,391	100.00%	10	Jersey	146	100.00%
9	Dawsonville	3,720	100.00%	10	Social Circle	4,974	100.00%
9	Dahlonega	7,537	100.00%	10	Monroe	14,928	100.00%
9	East Ellijay	650	100.00%	10	Between	402	100.00%
9	Ellijay	1,862	100.00%	10	Auburn	7,495	100.00%
9	McCaysville	1,149	100.00%	10	Carl	209	100.00%
9	Blue Ridge	1,253	100.00%	10	Bethlehem	715	100.00%
9	Morganton	285	100.00%	10	Winder	18,338	100.00%
9	Blairsville	616	100.00%	10	Rutledge	871	100.00%
9	Jasper	4,018	98.38%	10	Good Hope	339	100.00%
9	Arcade	1,884	100.00%	10	Bostwick	378	100.00%
9	Braselton	7,490	55.88%	10	Madison	4,447	100.00%
				10	Buckhead	194	100.00%
				10	Monticello	2,541	100.00%

Communities of Interest (Condensed)

Enacted Congress B-V-C

District	City/Town	Population	% Pop	District	City/Town	Population	% Pop
10	Mansfield	442	100.00%	11	Smyrna	25,849	46.44%
10	Newborn	676	100.00%	11	Euharlee	4,268	100.00%
10	Shady Dale	252	100.00%	11	Emerson	1,415	100.00%
10	Eatonton	6,307	100.00%	11	Cartersville	23,187	100.00%
10	Oconee	197	100.00%	11	White	661	100.00%
10	Deepstep	117	100.00%	11	Adairsville	4,878	100.00%
10	Milledgeville	17,070	100.00%	11	Waleska	921	100.00%
10	Sparta	1,357	100.00%	11	Woodstock	35,065	100.00%
10	Warrenton	1,744	100.00%	11	Holly Springs	16,213	100.00%
10	Norwood	202	100.00%	11	Mountain	12	2.06%
10	Camak	141	100.00%		Park		
10	Avera	223	100.00%	12	Oliver	210	100.00%
10	Stapleton	402	100.00%	12	Sylvania	2,634	100.00%
10	Wrens	2,217	100.00%	12	Hiltonia	310	100.00%
10	Thomson	6,814	100.00%	12	Sardis	995	100.00%
10	Dearing	529	100.00%	12	Newington	290	100.00%
10	Harlem	2,333	65.33%	12	Girard	184	100.00%
10	White Plains	239	100.00%	12	Ambrose	327	100.00%
10	Siloam	194	100.00%	12	Douglas	11,722	100.00%
10	Wrightsville	3,449	100.00%	12	Broxton	1,060	100.00%
10	Adrian	322	58.33%	12	McRae-	0	0.00%
10	Harrison	339	100.00%		Helena		
10	Tennille	1,469	100.00%	12	Cadwell	381	100.00%
10	Sandersville	5,813	100.00%	12	Dexter	655	100.00%
10	Riddleville	80	100.00%	12	Rentz	312	100.00%
10	Davisboro	1,832	100.00%	12	Allentown	5	2.56%
10	Kite	160	100.00%	12	Montrose	203	100.00%
10	Bartow	186	100.00%	12	Dudley	593	100.00%
10	Wadley	1,643	100.00%	12	Dublin	16,074	100.00%
10	Louisville	2,381	100.00%	12	East Dublin	2,492	100.00%
10	Edge Hill	22	100.00%	12	Summertown	121	100.00%
10	Mitchell	153	100.00%	12	Twin City	1,642	100.00%
10	Gibson	630	100.00%	12	Garfield	257	100.00%
10	North High	552	100.00%	12	Midville	385	100.00%
	Shoals			12	Portal	638	100.00%
10	Statham	2,813	100.00%	12	Rocky Ford	167	100.00%
10	Bogart	1,326	100.00%	12	Millen	2,966	100.00%
10	Bishop	332	100.00%	12	Vidette	103	100.00%
10	Watkinsville	2,896	100.00%	12	Keysville	300	100.00%
10	Braselton	5,903	44.04%	12	Hephzibah	3,830	100.00%
10	Loganville	10,972	77.67%	12	Blythe	744	100.00%
10	Dacula	6,882	100.00%	12	Harlem	1,238	34.67%
11	Canton	32,973	100.00%	12	Grovetown	15,577	100.00%
11	Sandy	15,288	14.15%	12	Waynesboro	5,799	100.00%
	Springs			12	Nicholls	3,147	100.00%
11	Atlanta	31,886	6.39%	12	Denton	189	100.00%
11	Acworth	22,440	100.00%	12	Hazlehurst	4,088	100.00%
11	Kennesaw	33,036	100.00%	12	Graham	263	100.00%
11	Ball Ground	2,560	100.00%	12	Baxley	4,942	100.00%
11	Nelson	596	52.05%	12	Scotland	7	4.05%
11	Taylorsville	217	86.11%	12	Alamo	771	100.00%
11	Kingston	722	100.00%	12	Glenwood	850	100.00%
11	Marietta	53,010	86.94%				

Communities of Interest (Condensed)

Enacted Congress B-V-C

District	City/Town	Population	% Pop	District	City/Town	Population	% Pop
12	Mount Vernon	1,990	100.00%	13	Austell	7,713	100.00%
12	Soperton	2,889	100.00%	13	Smyrna	29,814	53.56%
12	Uvalda	439	100.00%	14	Tunnel Hill	963	100.00%
12	Alston	178	100.00%	14	Dalton	34,417	100.00%
12	Ailey	519	100.00%	14	Ringgold	3,414	100.00%
12	Higgston	314	100.00%	14	Cohutta	764	100.00%
12	Vidalia	10,785	100.00%	14	Dallas	14,042	100.00%
12	Santa Claus	204	100.00%	14	Hiram	4,929	100.00%
12	Lyons	4,239	100.00%	14	Chatsworth	4,874	100.00%
12	Tarrytown	66	100.00%	14	Eton	824	100.00%
12	Oak Park	512	100.00%	14	Varnell	2,179	100.00%
12	Nunez	134	100.00%	14	Jasper	66	1.62%
12	Surrency	194	100.00%	14	Talking Rock	91	100.00%
12	Statesboro	33,438	100.00%	14	Menlo	480	100.00%
12	Brooklet	1,704	100.00%	14	Tallapoosa	3,227	100.00%
12	Guyton	2,289	100.00%	14	Cedartown	10,190	100.00%
12	Springfield	2,703	100.00%	14	Waco	536	100.00%
12	Glennville	3,834	100.00%	14	Bremen	7,120	99.10%
12	Reidsville	2,515	100.00%	14	Buchanan	938	100.00%
12	Collins	540	100.00%	14	Temple	63	1.24%
12	Stillmore	439	100.00%	14	Rockmart	4,732	100.00%
12	Cobbtown	341	100.00%	14	Aragon	1,440	100.00%
12	Metter	4,004	100.00%	14	Braswell	355	100.00%
12	Manassas	59	100.00%	14	Cave Spring	1,174	100.00%
12	Bellville	127	100.00%	14	Lyerly	454	100.00%
12	Hagan	959	100.00%	14	Summerville	4,435	100.00%
12	Claxton	2,602	100.00%	14	Trion	1,960	100.00%
12	Daisy	159	100.00%	14	Rome	37,713	100.00%
12	Pulaski	211	100.00%	14	Taylorsville	35	13.89%
12	Register	157	100.00%	14	Plainville	356	100.00%
12	Adrian	230	41.67%	14	Calhoun	16,949	100.00%
12	Swainsboro	7,425	100.00%	14	Resaca	1,142	100.00%
13	Villa Rica	7,264	42.80%	14	Trenton	2,195	100.00%
13	Chattahoochee Hills	2,948	99.93%	14	LaFayette	6,888	100.00%
13	Douglasville	34,650	100.00%	14	Lookout Mountain	1,641	100.00%
13	Powder Springs	16,887	100.00%	14	Chickamauga	2,917	100.00%
13	Palmetto	4,510	88.94%	14	Rossville	3,980	100.00%
13	Tyrone	0	0.00%	14	Fort Oglethorpe	10,423	100.00%
13	Fairburn	16,483	100.00%	14	Fairmount	772	100.00%
13	Fayetteville	666	3.51%	14	Ranger	107	100.00%
13	Hampton	3,511	41.96%				
13	Jonesboro	4,235	100.00%				
13	Lovejoy	10,122	100.00%				
13	Stockbridge	28,973	100.00%				
13	Riverdale	15,129	100.00%				
13	Morrow	495	7.54%				
13	Union City	26,830	100.00%				
13	South Fulton	90,222	83.98%				
13	College Park	3,074	22.07%				
13	East Point	3,706	9.66%				

DECLARATION OF WILLIAM S. COOPER:
EXHIBIT M-6

User:

Plan Name: **Enacted_2021_Plan**

Plan Type:

Communities of Interest (Condensed)

Tuesday, November 22, 2022

8:11 AM

Whole City/Town : 488**City/Town Splits: 99****Zero Population City/Town Splits: 8**

District	City/Town	Population	% Pop	District	City/Town	Population	% Pop
1	Guyton GA	285	12.45%	6	Sandy Springs GA	53,531	49.53%
1	Springfield GA	18	0.67%	6	Roswell GA	88,668	95.51%
2	Barwick GA	258	71.07%	6	Alpharetta GA	61,428	93.33%
2	Pavo GA	380	61.09%	6	Suwanee GA	0	0.00%
2	Perry GA	90	0.44%	6	Nelson GA	596	52.05%
2	Centerville GA	8,228	100.00%	6	Sugar Hill GA	19,576	78.07%
2	Warner Robins GA	31,703	39.48%	6	Buford GA	695	4.05%
2	Columbus GA	175,155	84.65%	6	Marietta GA	8,207	13.46%
2	Manchester GA	92	2.57%	6	Holly Springs GA	404	2.49%
3	Chattahoochee Hills GA	2	0.07%	6	Mountain Park GA	571	97.94%
3	Douglasville GA	1,139	3.29%	7	Sandy Springs GA	1,550	1.43%
3	Palmetto GA	561	11.06%	7	Roswell GA	4,165	4.49%
3	Tyrone GA	7,658	100.00%	7	Alpharetta GA	4,390	6.67%
3	Fayetteville GA	18,554	97.87%	7	Suwanee GA	346	1.66%
3	McDonough GA	1,033	3.56%	7	Loganville GA	3,155	22.33%
3	Columbus GA	31,767	15.35%	7	Lawrenceville GA	29,016	94.73%
3	Manchester GA	3,492	97.43%	7	Dacula GA	6,882	100.00%
4	Covington GA	13,954	98.32%	8	Barwick GA	105	28.93%
4	Oxford GA	2,275	98.57%	8	Pavo GA	242	38.91%
4	Avondale Estates GA	341	9.56%	8	Perry GA	20,534	99.56%
4	Atlanta GA	42	0.01%	8	McRae-Helena GA	6,253	100.00%
5	Riverdale GA	0	0.00%	8	Centerville GA	0	0.00%
5	Forest Park GA	14,165	71.07%	8	Warner Robins GA	48,605	60.52%
5	Avondale Estates GA	3,226	90.44%	8	Allentown GA	190	97.44%
5	Sandy Springs GA	52,999	49.04%	8	Scotland GA	166	95.95%
5	South Fulton GA	3,731	3.47%	9	Royston GA	2,648	99.96%
5	College Park GA	8,958	64.31%	9	Auburn GA	225	3.00%
5	East Point GA	34,652	90.34%	9	Braselton GA	7,160	53.42%
5	Atlanta GA	497,973	99.85%	9	Maysville GA	1,033	55.33%
				9	Suwanee GA	20,440	98.34%
				9	Lawrenceville GA	1,613	5.27%
				9	Dacula GA	0	0.00%
				9	Sugar Hill GA	5,500	21.93%
				9	Buford GA	16,449	95.95%

Communities of Interest (Condensed)

Ga_Congress_Enacted_2021_P

District	City/Town	Population	% Pop	District	City/Town	Population	% Pop
10	Royston GA	1	0.04%				
10	Stockbridge GA	0	0.00%				
10	McDonough GA	28,018	96.44%				
10	Covington GA	238	1.68%				
10	Oxford GA	33	1.43%				
10	Auburn GA	7,270	97.00%				
10	Braselton GA	6,243	46.58%				
10	Maysville GA	834	44.67%				
10	Loganville GA	10,972	77.67%				
11	Nelson GA	549	47.95%				
11	Taylorsville GA	217	86.11%				
11	Marietta GA	52,765	86.54%				
11	Smyrna GA	30,193	54.24%				
11	Holly Springs GA	15,809	97.51%				
11	Mountain Park GA	12	2.06%				
12	McRae-Helena GA	0	0.00%				
12	Allentown GA	5	2.56%				
12	Scotland GA	7	4.05%				
12	Guyton GA	2,004	87.55%				
12	Springfield GA	2,685	99.33%				
13	Chattahoochee Hills GA	2,948	99.93%				
13	Douglasville GA	33,511	96.71%				
13	Palmetto GA	4,510	88.94%				
13	Tyrone GA	0	0.00%				
13	Fayetteville GA	403	2.13%				
13	Stockbridge GA	28,973	100.00%				
13	Riverdale GA	15,129	100.00%				
13	Forest Park GA	5,767	28.93%				
13	South Fulton GA	103,705	96.53%				
13	College Park GA	4,972	35.69%				
13	East Point GA	3,706	9.66%				
13	Atlanta GA	700	0.14%				
13	Austell GA	126	1.63%				
13	Smyrna GA	25,470	45.76%				
14	Austell GA	7,587	98.37%				
14	Taylorsville GA	35	13.89%				

EXHIBIT 2

Expert Report of Dr. Maxwell Palmer

Pendergrass v. Raffensperger (N.D. Ga.)

December 12, 2022

— 

EXPERT REPORT OF MAXWELL PALMER, PH.D.

I, Dr. Maxwell Palmer, declare as follows:

1. My name is Maxwell Palmer. I am currently an Associate Professor of Political Science at Boston University. I joined the faculty at Boston University in 2014, after completing my Ph.D. in Political Science at Harvard University. I was promoted to Associate Professor, with tenure, in 2021. I am also a Civic Tech Fellow in the Faculty of Computing & Data Sciences and a Faculty Fellow at the Initiative on Cities. I teach and conduct research on American politics and political methodology.
2. I have published academic work in leading peer-reviewed academic journals, including the *American Political Science Review*, *Journal of Politics*, *Perspectives on Politics*, *British Journal of Political Science*, *Journal of Empirical Legal Studies*, *Political Science Research and Methods*, *Legislative Studies Quarterly*, and *Urban Affairs Review*. My book, *Neighborhood Defenders: Participatory Politics and America's Housing Crisis*, was published by Cambridge University Press in 2019. I have also published academic work in the *Ohio State University Law Review*. My published research uses a variety of analytical approaches, including statistics, geographic analysis, and simulations, and data sources including academic surveys, precinct-level election results, voter registration and vote history files, and census data. My curriculum vitae is attached to this report.
3. I have served as an expert witness or litigation consultant on numerous cases involving voting restrictions. I testified at trial, court hearing, or by deposition in *Bethune Hill v. Virginia* before the U.S. District Court for the Eastern District of Virginia (No. 3:14-cv-00852-REP-AWA-BMK); *Thomas v. Bryant* before the U.S. District Court for the Southern District of Mississippi (No. 3:18-CV-00441-CWR-FKB); *Chestnut v. Merrill* before the U.S. District Court for the Northern District of Alabama (No. 2:18-cv-00907-KOB); *Dwight v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:18-cv-2869-RWS); *Bruni v. Hughs* before the U.S. District Court for the Southern District of Texas (No. 5:20-cv-35); *Caster v. Merrill* before the U.S. District Court for the Northern District of Alabama (No. 2:21-cv-1536-AMM); *Pendergrass v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:21-CV-05339-SCJ); *Grant v. Raffensperger* before the U.S. District Court for the Northern District of Georgia (No. 1:22-CV-00122-SCJ); and *Galmon v. Ardoin* before the U.S. District Court for the Middle District of Louisiana (3:22-cv-00214-SDD-SDJ). I also served as the independent racially polarized voting analyst for the Virginia Redistricting Commission in 2021, and I have worked as a consultant to the United State Department of Justice on several matters. My expert testimony has been accepted and relied upon by courts; in no case has my testimony been rejected or

found unreliable.

4. I am being compensated at a rate of \$350 per hour. No part of my compensation is dependent upon the conclusions that I reach or the opinions that I offer.
5. I testified in this matter in the preliminary injunction proceedings on February 10, 2022. I was accepted by the court as an expert in redistricting and data analysis.
6. I was retained by the plaintiffs in this litigation to offer an expert opinion on the extent to which voting is racially polarized in Northwest Georgia. I was also asked to evaluate the performance of the 6th Congressional District in the plaintiffs' illustrative map.
7. I find strong evidence of racially polarized voting across the focus area, which is comprised of the 3rd, 6th, 11th, 13th, and 14th Congressional Districts under the 2021 redistricting map.¹ Black and White voters consistently support different candidates. On average, I estimate that 98.4% of Black voters support the same candidate, while only 12.4% of White voters support the Black-preferred candidate. I also find strong evidence of racially polarized voting in each of the five individual congressional districts.
8. Black-preferred candidates are largely unable to win elections in the focus area. Across an analysis of 40 statewide elections from 2012 to 2022, the Black-preferred candidate lost every election in the focus area. When taken on a district-by-district basis, the Black-preferred candidate was defeated in every one of the 40 elections analyzed in the 3rd, 6th, 11th, and 14th Congressional Districts. The Black-preferred candidate won a majority of the vote in the 13th Congressional District in all 40 elections.
9. Under the plaintiffs' illustrative map, I find that Black-preferred candidates are able to win elections in the new 6th Congressional District. Across 31 statewide elections from 2012 to 2021, the Black-preferred candidate won an average of 66.1% of the vote in this illustrative district.²

Data Sources and Elections Analyzed

10. For the purpose of my analysis, I examined elections in the 3rd, 6th, 11th, 13th, and 14th Congressional Districts, under the plan adopted by the state legislature in 2021. Collectively, I refer to this area as the "focus area." Figure 1 maps the focus area.
11. To analyze racially polarized voting, I relied on precinct-level election results and voter turnout by race, compiled by the state of Georgia. The data includes the racial breakdown of registrants and voters in each precinct, based on registrants' self-identified race when registering to vote. Data for the 2012, 2014, 2016, and 2018 general elections

¹In my expert report for the preliminary injunction hearing, I defined the focus area as the 3rd, 11th, 13th, and 14th Congressional Districts. I added the 6th District to the focus area in this report because the plaintiff's revised illustrative map now includes a portion of the 6th District in the new majority-minority district.

²As discussed below, I was not able to include the 2022 general elections in this analysis because 2022 precinct geography data was not available.

2021⁷ elections was assembled by the Voting and Election Science Team, an academic group that provides precinct-level data for U.S. Elections, based on data from the Secretary of State.^{8,9} Precinct shape files for 2012 through 2020 were downloaded from the Georgia General Assembly’s Legislative and Congressional Reapportionment Office.¹⁰

12. The state of Georgia provides six options for race and ethnicity on the voter registration form: Black, White, Hispanic/Latino, Asian/Pacific Islander, American Indian, and Other.¹¹ I combined Hispanic/Latino, Asian/Pacific Islander and American Indian into the “Other” category.

Racially Polarized Voting Analysis

13. In analyzing racially polarized voting in each election, I used a statistical procedure, ecological inference (EI), that estimates group-level preferences based on aggregate data. I analyzed the results for three racial demographic groups: Non-Hispanic Black, Non-Hispanic White, and Other, based on the voters’ self-identified race in the voter registration database. I excluded third party and write-in candidates, and analyzed votes for the two major-party candidates in each election. The results of this analysis are estimates of the percentage of each group that voted for the candidate from each party in each election. The results include both a mean estimate (the most likely vote share) and a 95% confidence interval.¹²
14. Interpreting the results of the ecological inference models proceeds in two general stages. First, I examined the support for each candidate by each demographic group to determine if members of the group vote cohesively in support of a single candidate in each election. When a significant majority of the group supports a single candidate, I can then identify that candidate as the group’s candidate of choice. If the group’s support is roughly evenly divided between the two candidates, then the group does not cohesively support a single candidate and does not have a clear preference. Second, after identifying the preferred candidate for each group (or the lack of such a candidate), I compared the preferences of White voters to the preferences of Black voters. Evidence of

⁷Voting and Election Science Team, 2020, “2020 Precinct-Level Election Results”, <https://doi.org/10.7910/DVN/K7760H>, Harvard Dataverse, V21; ga_2020.zip. Note that the 2020 election results file includes the 2021 runoff election results as well.

⁸The election results provided by VEST are the same as the precinct-level data available on the website of the Georgia Secretary of State. However, VEST provides the data in a more convenient format.

⁹As of December 12, 2022, precinct-level voter turnout data for the 2022 runoff election was not available.

¹⁰<https://www.legis.ga.gov/joint-office/reapportionment>.

¹¹https://sos.ga.gov/admin/files/GA_VR_APP_2019.pdf.

¹²The 95% confidence interval is a measure of uncertainty in the estimates from the model. For example, the model might estimate that 94% of the members of a group voted for a particular candidate, with a 95% confidence interval of 91-96%. This means that based on the data and the model assumptions, 95% of the simulated estimates for this group fall in the range of 91-96%, with 94% being the average value. Larger confidence intervals reflect a higher degree of uncertainty in the estimates, while smaller confidence intervals reflect less uncertainty.

racially polarized voting is found when Black voters and White voters support different candidates.

15. Figure 2 presents the estimates of support for the Black-preferred candidate for Black and White voters for all 40 electoral contests from 2012 to 2022. Here, I present only the estimates and confidence intervals, and exclude individual election labels. Full results for each election are presented in Figure 3 and Table 1. In each panel, the solid dots correspond to an estimate in a particular election, and the gray vertical lines behind each dot are the 95% confidence intervals for the estimate.¹³

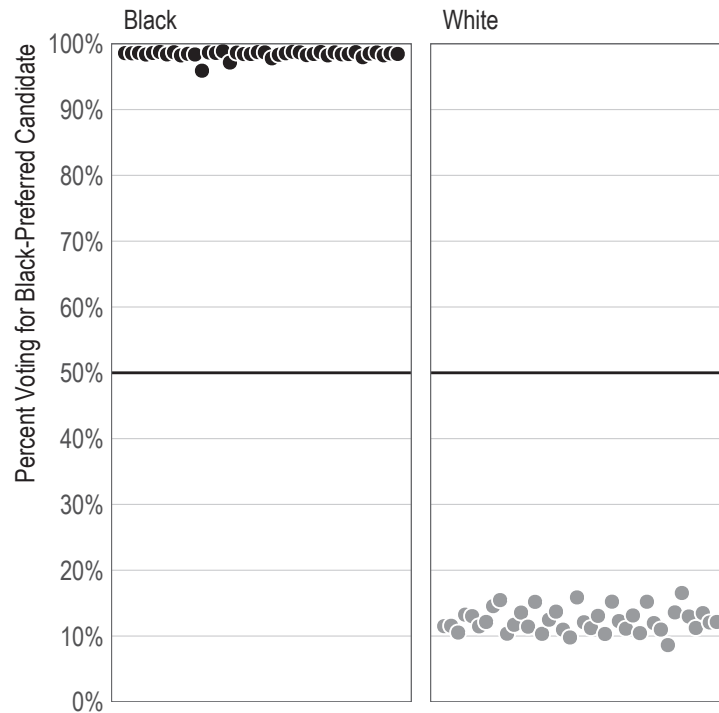


Figure 2: Racially Polarized Voting Estimates by Race — Focus Area

16. Examining Figure 2, the estimates for support for Black-preferred candidates by Black voters are all significantly above 50%. Black voters are extremely cohesive, with a clear candidate of choice in all 40 elections. On average, Black voters supported their candidates of choice with 98.4% of the vote.
17. In contrast to Black voters, Figure 2 shows that White voters are highly cohesive in voting in *opposition* to the Black-preferred candidate in every election. On average, White voters supported Black-preferred candidates with 12.4% of the vote, and in no election did this estimate exceed 17%.
18. Figure 3 presents the same results as Figure 2, separated by each electoral contest. The estimated levels of support for the Black-preferred candidate in each election for each

¹³In some cases the lines for the confidence intervals are not visible behind the dots because they are relatively small.

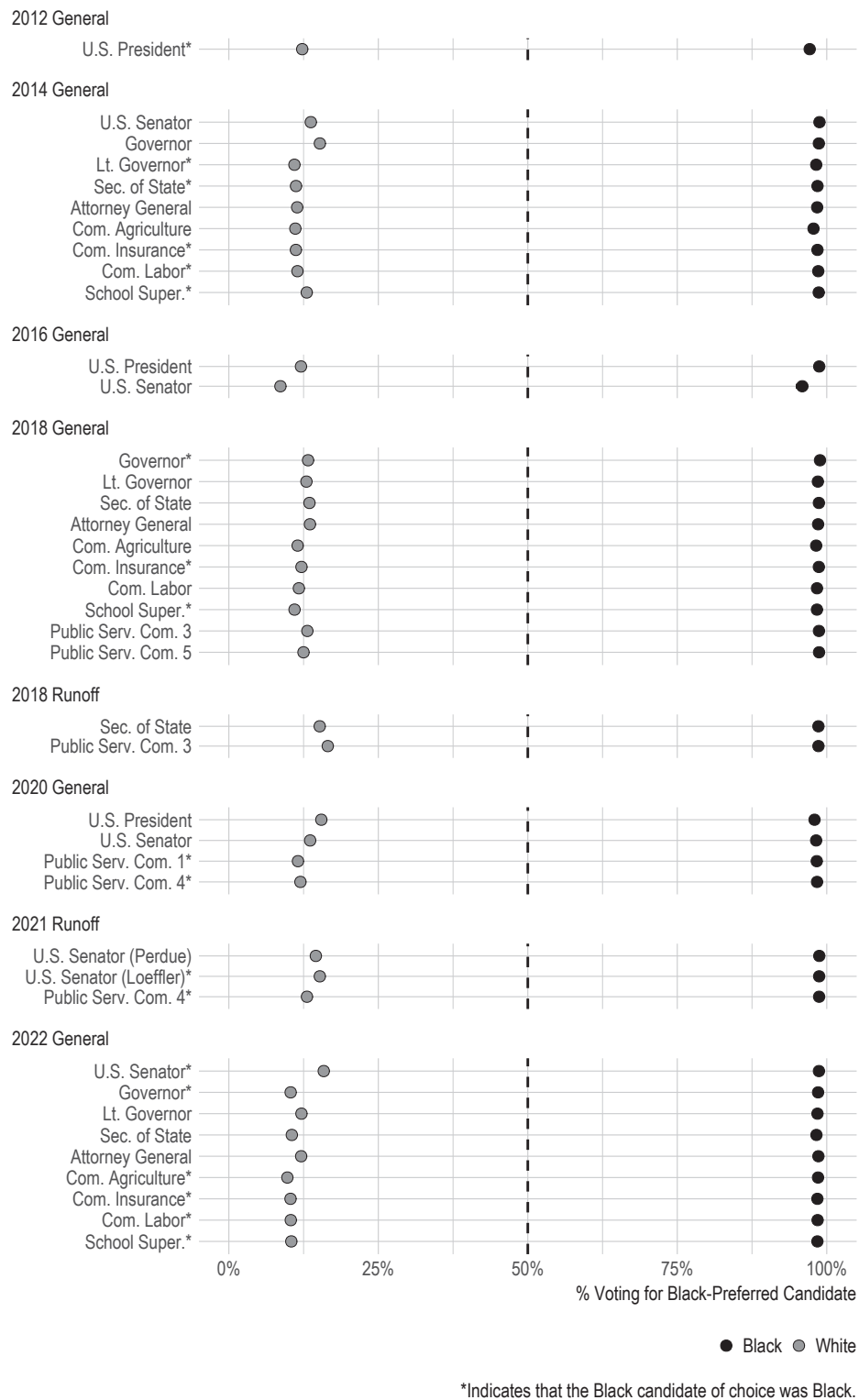


Figure 3: Racially Polarized Voting Estimates by Election — Focus Area

group are represented by the colored points, and the horizontal lines indicate the range of the 95% confidence intervals. In every election, Black voters have a clear candidate of choice, and White voters are strongly opposed to this candidate.

19. There is also strong evidence of racially polarized voting in each of the five congressional districts that comprise the focus area. Figure 4 plots the results, and Tables 2–6 present the full results. Black voters are extremely cohesive, with a clear candidate of choice in all 40 elections in each district. On average, Black voters supported their candidates of choice with 97.2% of the vote in CD 3, 93.3% in CD 6, 96.1% in CD 11, 99.0% in CD 13, and 95.8% in CD 14.
20. In contrast to Black voters, Figure 4 shows that White voters are highly cohesive in voting in opposition to the Black-preferred candidate in every election in each district. On average, White voters supported Black-preferred candidates with 6.7% of the vote in CD 3, 20.2% in CD 6, 16.1% in CD 11, 15.5% in CD 13, and 10.3% in CD 14.

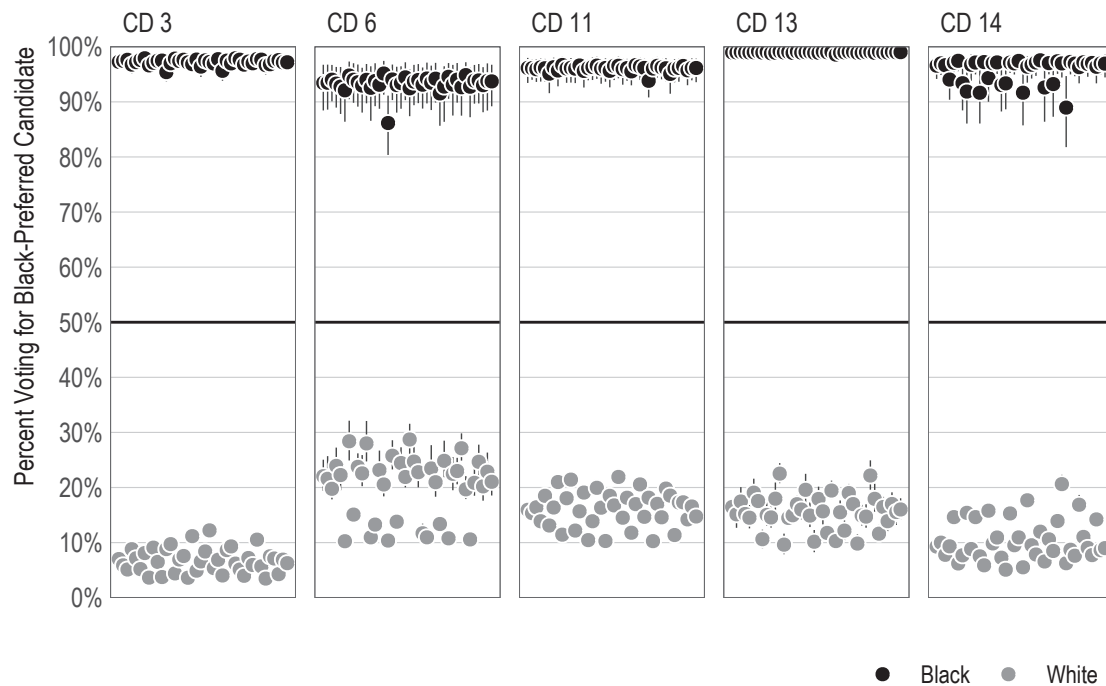


Figure 4: Racially Polarized Voting Estimates by Race — Congressional Districts

Performance of Black-Preferred Candidates in the Focus Area

21. Having identified the Black-preferred candidate in each election, I now turn to their ability to win elections in these districts. Table 7 presents the results of each election in the focus area and each congressional district. For each election, I present the vote share obtained by the Black-preferred candidate.¹⁴
22. The White-preferred candidate won the majority of the vote in all 40 elections in the focus area. In the 3rd, 6th, 11th, and 14th Congressional Districts, the White-preferred candidate received a larger share of the vote than the Black-preferred candidate in all 40 elections. In the 13th Congressional District, the Black-preferred candidate won a larger share of the vote in all 40 elections.

Performance of the the Sixth Congressional District in the Illustrative Map

23. I also analyzed the performance of Black-preferred candidates in the new 6th Congressional District proposed in the plaintiffs' illustrative map by calculating the percentage of the vote won by the Black-preferred candidates across the 31 statewide races from 2012 through 2021.
24. To perform this analysis, I used geographic data on the boundaries of the voting precincts in each year and the boundaries of the districts in the illustrative maps to determine which voting precincts would be located in each district. Then, I aggregated the election results for each contest for all of the precincts in each district to find the estimated vote shares of candidates in each contest. I was not able to include the 2022 elections in this analysis because, as of December 12, 2022, precinct boundary data for the 2022 voting precincts was not available.
25. Figure 5 presents the results of this analysis. In the plaintiffs' illustrative 6th Congressional District, the Black-preferred candidate won a larger share of the vote in all 31 statewide elections, with an average of 66.1%. Table 8 provide the full results.
26. Under the plaintiffs' illustrative map, the 13th Congressional District (the only district in the focus area to which the Black-preferred candidate won a majority of the vote in every election) continues to perform for Black-preferred candidates. I estimate that under this map Black-preferred candidates won a larger share of the vote in all 40 statewide elections, with an average of 62.3%.

¹⁴Winning elections in Georgia requires a majority of the vote rather than a plurality of the vote (the threshold in most of the states). In this table and following sections analyzing election results I present vote shares as percentages of the two-party vote (excluding third party and independent candidates).

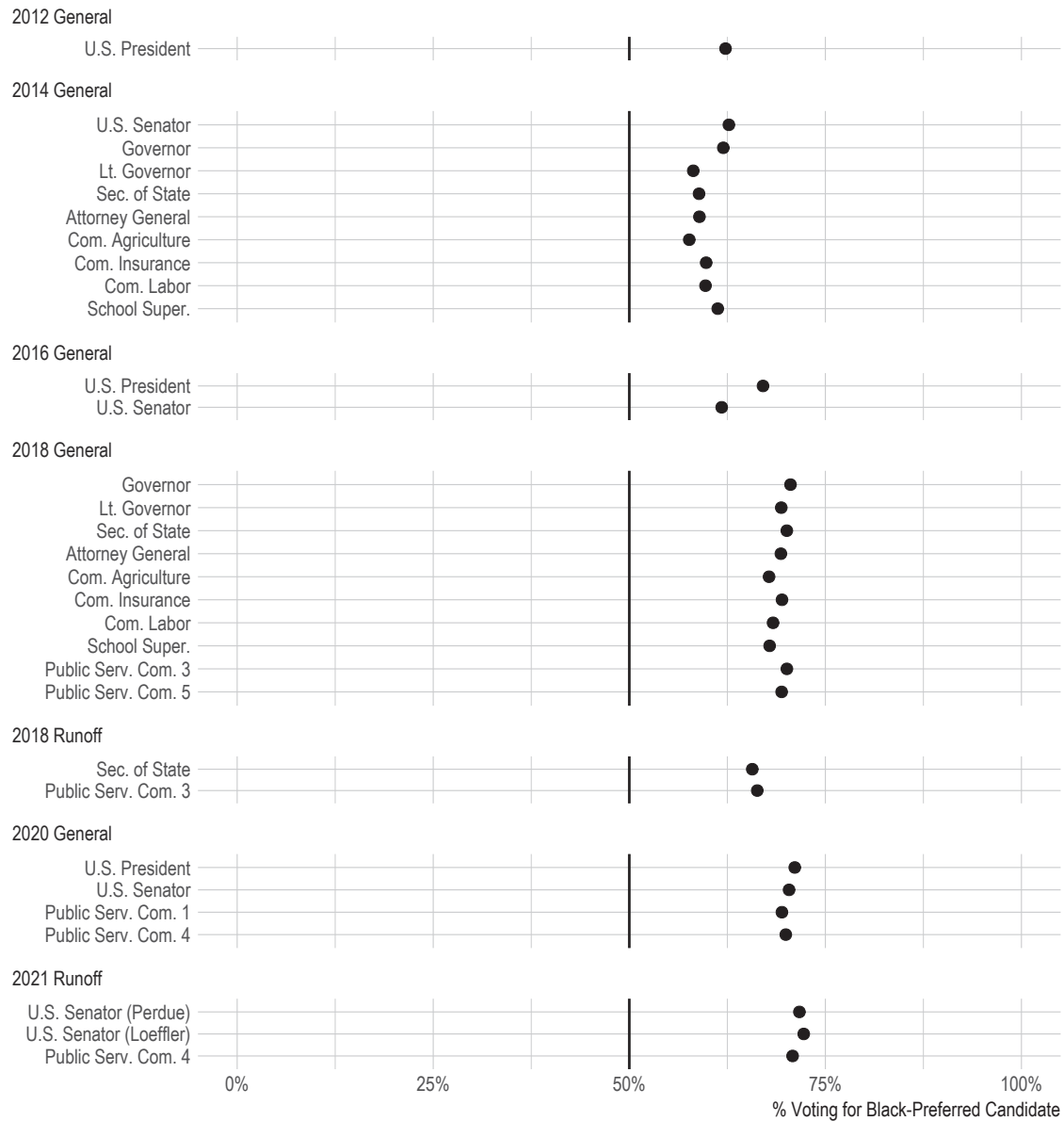


Figure 5: Vote Shares of Black-Preferred Candidates in CD 6 Under the Illustrative Map

Table 1: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — Focus Area

		Black	White	Other
2012 General	U.S. President*	97.1% (96.6, 97.6)	12.3% (12.0, 12.5)	94.7% (92.9, 96.2)
2014 General	U.S. Senator	98.8% (98.4, 99.1)	13.7% (13.4, 14.0)	94.0% (91.4, 96.0)
	Governor	98.7% (98.3, 99.0)	15.2% (14.8, 15.6)	83.8% (80.2, 87.3)
	Lt. Governor*	98.2% (97.8, 98.6)	11.0% (10.5, 11.5)	70.0% (65.7, 73.8)
	Sec. of State*	98.5% (98.1, 98.8)	11.2% (10.8, 11.6)	75.1% (71.7, 78.7)
	Attorney General	98.4% (98.0, 98.7)	11.4% (11.0, 11.9)	79.2% (75.3, 83.0)
	Com. Agriculture	97.8% (97.2, 98.3)	11.1% (10.6, 11.6)	66.9% (62.7, 71.4)
	Com. Insurance*	98.4% (98.0, 98.8)	11.2% (10.8, 11.7)	79.2% (75.1, 83.0)
	Com. Labor*	98.6% (98.2, 98.9)	11.5% (11.0, 11.9)	78.7% (75.3, 82.5)
	School Super.*	98.7% (98.3, 99.0)	13.0% (12.6, 13.5)	86.9% (83.3, 90.1)
2016 General	U.S. President	98.7% (98.4, 99.0)	12.1% (11.8, 12.4)	94.7% (93.3, 95.8)
	U.S. Senator	95.9% (95.0, 96.7)	8.6% (8.1, 9.2)	85.6% (82.0, 89.3)
2018 General	Governor*	98.9% (98.6, 99.1)	13.2% (13.0, 13.5)	93.5% (92.2, 94.6)
	Lt. Governor	98.5% (98.2, 98.8)	13.0% (12.7, 13.3)	91.2% (89.6, 92.5)
	Sec. of State	98.7% (98.4, 99.0)	13.5% (13.2, 13.8)	92.2% (90.7, 93.6)
	Attorney General	98.6% (98.2, 98.9)	13.6% (13.1, 14.1)	90.0% (87.6, 92.2)
	Com. Agriculture	98.2% (97.7, 98.7)	11.5% (11.1, 11.9)	87.6% (85.3, 89.8)
	Com. Insurance*	98.7% (98.3, 98.9)	12.1% (11.8, 12.5)	91.7% (90.1, 93.1)
	Com. Labor	98.4% (97.9, 98.7)	11.7% (11.3, 12.2)	89.2% (86.7, 91.2)
	School Super.*	98.4% (98.0, 98.7)	11.0% (10.6, 11.4)	88.1% (86.0, 90.0)
	Public Serv. Com. 3	98.7% (98.4, 99.0)	13.1% (12.8, 13.5)	92.2% (90.6, 93.5)
	Public Serv. Com. 5	98.7% (98.4, 99.0)	12.5% (12.2, 12.9)	90.5% (88.7, 92.0)
2018 Runoff	Sec. of State	98.6% (98.2, 98.9)	15.2% (14.9, 15.6)	90.0% (87.8, 91.8)
	Public Serv. Com. 3	98.6% (98.2, 98.9)	16.5% (16.2, 16.9)	90.2% (87.8, 92.2)
2020 General	U.S. President	98.0% (97.4, 98.4)	15.5% (15.0, 16.0)	90.4% (88.0, 92.3)
	U.S. Senator	98.2% (97.8, 98.7)	13.6% (13.2, 14.1)	90.8% (88.7, 92.7)
	Public Serv. Com. 1*	98.3% (97.9, 98.7)	11.6% (11.2, 12.0)	90.0% (88.1, 91.7)
	Public Serv. Com. 4*	98.4% (98.0, 98.7)	12.0% (11.6, 12.4)	91.6% (89.6, 93.1)
2021 Runoff	U.S. Senator (Perdue)	98.7% (98.4, 99.0)	14.5% (14.3, 14.9)	94.4% (93.1, 95.5)
	U.S. Senator (Loeffler)*	98.7% (98.4, 99.0)	15.2% (14.9, 15.5)	95.1% (93.9, 96.1)
	Public Serv. Com. 4*	98.7% (98.4, 99.0)	13.1% (12.8, 13.4)	93.4% (91.9, 94.5)
2022 General	U.S. Senator*	98.7% (98.4, 99.0)	15.9% (15.6, 16.2)	95.7% (94.5, 96.6)
	Governor*	98.5% (98.2, 98.9)	10.3% (9.9, 10.8)	88.1% (86.2, 89.9)
	Lt. Governor	98.4% (98.0, 98.8)	12.1% (11.8, 12.6)	91.4% (89.6, 93.0)
	Sec. of State	98.3% (97.8, 98.6)	10.5% (10.0, 11.1)	81.6% (79.2, 84.2)
	Attorney General	98.6% (98.2, 98.9)	12.1% (11.7, 12.5)	89.7% (87.8, 91.4)
	Com. Agriculture*	98.5% (98.2, 98.9)	9.8% (9.4, 10.2)	88.7% (87.1, 90.3)
	Com. Insurance*	98.4% (98.0, 98.8)	10.3% (9.9, 10.8)	87.4% (85.4, 89.2)
	Com. Labor*	98.5% (98.1, 98.8)	10.4% (10.0, 10.8)	90.9% (89.2, 92.3)
	School Super.*	98.4% (98.0, 98.8)	10.4% (10.0, 10.9)	87.4% (85.5, 89.1)

* Indicates that the Black candidate of choice was Black.

Table 2: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates
— CD 3

		Black	White	Other
2012 General	U.S. President*	95.4% (93.7, 96.7)	8.8% (8.2, 9.7)	92.2% (85.7, 95.9)
2014 General	U.S. Senator	97.2% (95.7, 98.3)	11.2% (10.4, 12.2)	88.1% (77.5, 94.8)
	Governor	96.8% (95.3, 98.0)	12.2% (11.3, 13.4)	83.1% (70.1, 92.5)
	Lt. Governor*	96.8% (95.3, 97.9)	6.3% (5.5, 7.2)	84.8% (74.0, 92.2)
	Sec. of State*	97.1% (95.7, 98.2)	6.9% (6.2, 8.0)	86.3% (74.2, 93.2)
	Attorney General	96.6% (95.2, 97.8)	8.1% (7.5, 9.1)	87.9% (77.1, 93.7)
	Com. Agriculture	96.4% (94.5, 97.7)	6.6% (5.7, 7.7)	80.6% (67.1, 90.9)
	Com. Insurance*	97.0% (95.6, 98.1)	7.2% (6.5, 8.1)	86.7% (77.1, 93.6)
	Com. Labor*	97.0% (95.5, 98.1)	7.5% (6.7, 8.5)	85.9% (74.6, 93.8)
	School Super.*	97.3% (96.0, 98.3)	9.7% (8.9, 10.7)	84.6% (74.4, 92.2)
2016 General	U.S. President	97.7% (96.4, 98.6)	7.0% (6.6, 7.5)	94.5% (91.1, 96.9)
	U.S. Senator	95.6% (93.8, 97.1)	4.0% (3.5, 4.8)	92.0% (87.6, 95.1)
2018 General	Governor*	97.8% (96.7, 98.6)	6.5% (6.1, 7.0)	95.3% (92.2, 97.3)
	Lt. Governor	97.4% (96.3, 98.3)	6.2% (5.7, 6.8)	94.5% (90.8, 97.1)
	Sec. of State	97.5% (96.3, 98.4)	7.2% (6.7, 7.8)	94.8% (91.6, 97.1)
	Attorney General	97.6% (96.4, 98.5)	7.6% (7.1, 8.2)	93.6% (89.6, 96.3)
	Com. Agriculture	97.2% (96.0, 98.1)	4.9% (4.4, 5.5)	93.7% (90.3, 96.2)
	Com. Insurance*	97.5% (96.3, 98.4)	5.7% (5.2, 6.2)	94.9% (91.8, 97.0)
	Com. Labor	97.6% (96.5, 98.5)	5.1% (4.7, 5.7)	94.4% (90.8, 97.0)
	School Super.*	97.5% (96.3, 98.3)	4.4% (4.0, 4.9)	94.8% (91.9, 96.9)
	Public Serv. Com. 3	97.6% (96.5, 98.5)	6.9% (6.4, 7.5)	94.0% (90.8, 96.7)
	Public Serv. Com. 5	97.7% (96.5, 98.5)	5.9% (5.5, 6.5)	94.5% (91.1, 96.8)
2018 Runoff	Sec. of State	96.7% (95.0, 97.9)	8.8% (8.2, 9.4)	93.0% (89.0, 96.1)
	Public Serv. Com. 3	96.8% (95.2, 98.0)	10.5% (9.9, 11.4)	90.0% (82.2, 94.8)
2020 General	U.S. President	97.4% (96.2, 98.4)	8.4% (7.9, 9.0)	94.9% (91.4, 97.2)
	U.S. Senator	97.5% (96.1, 98.4)	6.9% (6.5, 7.4)	96.3% (94.0, 97.9)
	Public Serv. Com. 1*	97.9% (96.9, 98.7)	5.1% (4.7, 5.6)	95.6% (92.8, 97.4)
	Public Serv. Com. 4*	97.7% (96.5, 98.6)	5.9% (5.4, 6.4)	95.6% (93.1, 97.4)
2021 Runoff	U.S. Senator (Perdue)	97.8% (96.5, 98.6)	8.6% (8.2, 9.2)	95.4% (92.5, 97.4)
	U.S. Senator (Loeffler)*	97.5% (96.2, 98.5)	9.3% (8.8, 10.0)	95.2% (92.0, 97.2)
	Public Serv. Com. 4*	97.9% (96.8, 98.7)	7.1% (6.7, 7.6)	95.3% (92.5, 97.2)
2022 General	U.S. Senator*	97.6% (96.3, 98.6)	9.1% (8.6, 9.7)	94.8% (91.6, 97.0)
	Governor*	97.2% (95.8, 98.2)	4.0% (3.5, 4.6)	92.2% (88.9, 94.6)
	Lt. Governor	97.0% (95.5, 98.1)	5.4% (4.9, 6.0)	94.0% (91.2, 96.2)
	Sec. of State	96.9% (95.3, 98.0)	3.5% (3.0, 4.0)	91.8% (88.6, 94.2)
	Attorney General	97.3% (95.9, 98.3)	5.2% (4.7, 5.8)	94.0% (90.7, 96.3)
	Com. Agriculture*	97.0% (95.7, 98.0)	3.6% (3.0, 4.3)	90.8% (86.8, 94.1)
	Com. Insurance*	97.8% (96.7, 98.6)	3.7% (3.3, 4.3)	92.2% (88.8, 94.8)
	Com. Labor*	97.2% (95.8, 98.2)	4.3% (3.8, 4.9)	92.3% (89.0, 94.9)
	School Super.*	97.2% (96.0, 98.2)	3.6% (3.2, 4.1)	93.0% (90.2, 95.4)

* Indicates that the Black candidate of choice was Black.

Table 3: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates
— CD 6

		Black	White	Other
2012 General	U.S. President*	86.2% (80.4, 91.1)	13.4% (12.6, 14.4)	90.4% (83.0, 95.1)
2014 General	U.S. Senator	93.8% (89.7, 96.7)	15.1% (14.2, 16.5)	87.6% (77.7, 94.0)
	Governor	94.0% (90.1, 96.7)	13.8% (12.9, 15.0)	90.3% (82.5, 95.7)
	Lt. Governor*	93.4% (88.7, 96.5)	10.3% (9.2, 11.5)	82.8% (74.5, 89.8)
	Sec. of State*	94.0% (89.7, 96.9)	10.8% (9.7, 12.1)	83.1% (73.5, 91.0)
	Attorney General	94.5% (90.6, 97.0)	10.6% (9.7, 11.8)	86.2% (77.9, 92.2)
	Com. Agriculture	92.8% (87.2, 96.3)	10.4% (9.3, 11.8)	79.6% (70.1, 87.2)
	Com. Insurance*	95.1% (91.3, 97.4)	11.0% (10.0, 12.3)	84.2% (75.0, 90.9)
	Com. Labor*	94.9% (91.4, 97.2)	11.0% (9.8, 12.6)	84.0% (72.0, 92.3)
	School Super.*	94.0% (89.9, 97.1)	13.3% (12.3, 14.7)	86.1% (75.8, 93.0)
2016 General	U.S. President	94.0% (89.8, 97.0)	19.7% (17.9, 22.1)	80.9% (70.5, 88.2)
	U.S. Senator	93.8% (88.4, 97.0)	11.7% (10.3, 13.4)	75.7% (68.5, 81.2)
2018 General	Governor*	94.4% (90.3, 97.2)	24.7% (21.6, 27.7)	67.0% (56.1, 77.8)
	Lt. Governor	92.5% (87.4, 95.9)	23.9% (20.9, 27.2)	64.8% (53.2, 75.4)
	Sec. of State	93.4% (88.4, 96.7)	23.7% (21.4, 26.2)	67.6% (59.6, 75.9)
	Attorney General	93.9% (89.7, 96.9)	21.9% (20.0, 24.3)	71.6% (63.0, 78.3)
	Com. Agriculture	93.8% (89.2, 97.0)	20.6% (18.4, 23.0)	66.6% (58.0, 74.3)
	Com. Insurance*	93.5% (88.5, 96.6)	22.8% (20.0, 25.7)	65.2% (54.5, 74.9)
	Com. Labor	94.2% (89.7, 97.1)	20.9% (18.5, 23.6)	66.9% (57.3, 75.1)
	School Super.*	94.1% (90.3, 96.8)	19.8% (17.8, 22.2)	66.0% (57.5, 72.7)
	Public Serv. Com. 3	93.7% (89.2, 96.7)	23.0% (20.6, 25.4)	68.7% (60.4, 77.3)
	Public Serv. Com. 5	94.2% (89.9, 97.1)	23.2% (20.3, 26.7)	63.8% (51.3, 73.6)
2018 Runoff	Sec. of State	92.1% (86.4, 95.9)	27.1% (24.9, 29.8)	56.6% (43.9, 67.2)
	Public Serv. Com. 3	91.5% (85.7, 95.5)	28.7% (26.1, 31.6)	55.8% (42.3, 68.0)
2020 General	U.S. President	94.8% (90.5, 97.3)	28.0% (24.7, 32.1)	69.7% (57.1, 79.9)
	U.S. Senator	93.0% (88.0, 96.4)	24.4% (21.8, 27.3)	70.9% (62.0, 78.8)
	Public Serv. Com. 1*	92.5% (86.6, 96.5)	22.1% (19.4, 25.0)	69.1% (59.9, 77.2)
	Public Serv. Com. 4*	93.1% (87.5, 96.7)	22.9% (19.8, 26.3)	68.5% (58.0, 77.7)
2021 Runoff	U.S. Senator (Perdue)	93.6% (89.1, 96.8)	24.7% (21.9, 27.8)	73.9% (64.1, 82.6)
	U.S. Senator (Loeffler)*	93.0% (88.1, 96.3)	25.8% (23.3, 28.6)	74.4% (65.0, 82.3)
	Public Serv. Com. 4*	92.8% (87.8, 96.3)	22.6% (20.2, 25.9)	73.2% (62.9, 80.5)
2022 General	U.S. Senator*	92.8% (86.4, 96.5)	28.4% (24.9, 32.1)	73.3% (61.2, 84.4)
	Governor*	94.0% (89.8, 96.9)	22.3% (19.5, 25.2)	62.5% (53.0, 71.4)
	Lt. Governor	92.7% (87.5, 95.9)	24.8% (21.9, 28.5)	65.3% (53.3, 75.1)
	Sec. of State	93.7% (89.4, 96.7)	20.2% (17.6, 23.0)	62.3% (53.5, 70.8)
	Attorney General	93.3% (89.0, 96.3)	23.5% (20.6, 27.7)	67.2% (54.2, 76.3)
	Com. Agriculture*	93.5% (88.6, 96.8)	21.0% (18.3, 24.3)	64.4% (53.7, 72.7)
	Com. Insurance*	93.1% (88.8, 96.2)	21.0% (18.5, 23.9)	64.0% (54.7, 72.0)
	Com. Labor*	93.1% (88.7, 96.3)	22.5% (19.5, 25.5)	63.4% (53.4, 72.9)
	School Super.*	93.0% (88.1, 96.2)	21.6% (18.6, 25.7)	63.0% (49.8, 72.6)

* Indicates that the Black candidate of choice was Black.

Table 4: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 11

		Black	White	Other
2012 General	U.S. President*	93.8% (90.8, 95.9)	14.6% (13.9, 15.5)	91.1% (84.6, 95.5)
2014 General	U.S. Senator	95.5% (93.0, 97.3)	16.4% (15.7, 17.4)	89.1% (80.0, 94.7)
	Governor	96.1% (93.7, 97.8)	16.3% (15.6, 17.3)	89.7% (80.2, 95.7)
	Lt. Governor*	96.1% (93.8, 97.8)	10.5% (9.9, 11.3)	90.2% (83.7, 94.9)
	Sec. of State*	96.0% (93.6, 97.8)	11.4% (10.8, 12.1)	91.3% (84.7, 95.9)
	Attorney General	96.5% (94.4, 98.1)	11.4% (10.9, 12.3)	91.5% (83.3, 95.8)
	Com. Agriculture	96.3% (93.8, 98.0)	10.3% (9.6, 11.0)	91.8% (85.6, 95.9)
	Com. Insurance*	96.7% (94.6, 98.1)	11.8% (11.2, 12.6)	90.7% (83.3, 95.7)
	Com. Labor*	96.2% (93.7, 97.8)	12.2% (11.6, 13.0)	90.2% (82.6, 95.3)
	School Super.*	96.1% (93.9, 97.8)	14.7% (14.0, 15.7)	90.3% (80.0, 95.6)
2016 General	U.S. President	96.2% (93.5, 98.0)	16.8% (16.1, 17.7)	93.3% (88.6, 96.5)
	U.S. Senator	96.7% (94.5, 98.3)	10.3% (9.7, 11.0)	94.7% (90.8, 97.3)
2018 General	Governor*	96.0% (93.3, 97.9)	19.1% (18.3, 20.2)	93.2% (86.9, 96.7)
	Lt. Governor	96.0% (93.5, 97.9)	18.1% (17.4, 19.1)	93.7% (88.5, 97.0)
	Sec. of State	96.5% (94.3, 98.2)	18.5% (17.8, 19.4)	93.8% (89.0, 97.0)
	Attorney General	96.6% (94.6, 98.1)	18.1% (17.4, 18.9)	94.1% (89.5, 97.0)
	Com. Agriculture	96.2% (93.7, 97.9)	15.7% (14.9, 16.7)	93.4% (88.2, 96.7)
	Com. Insurance*	96.5% (94.4, 98.2)	17.3% (16.5, 18.3)	92.2% (86.9, 96.1)
	Com. Labor	96.1% (93.7, 97.9)	16.4% (15.5, 17.6)	92.5% (86.1, 96.3)
	School Super.*	96.3% (94.0, 98.1)	15.4% (14.6, 16.4)	92.7% (86.7, 96.3)
	Public Serv. Com. 3	96.5% (94.0, 98.1)	18.5% (17.8, 19.7)	92.2% (85.7, 95.9)
	Public Serv. Com. 5	96.1% (93.9, 97.9)	17.3% (16.6, 18.3)	93.3% (88.3, 96.5)
2018 Runoff	Sec. of State	95.1% (91.5, 97.4)	19.8% (18.9, 20.9)	89.7% (81.4, 95.1)
	Public Serv. Com. 3	95.1% (91.6, 97.5)	21.4% (20.5, 22.7)	87.9% (78.5, 94.0)
2020 General	U.S. President	96.1% (93.7, 97.9)	20.6% (19.7, 21.9)	93.2% (87.7, 96.5)
	U.S. Senator	96.4% (94.0, 98.1)	18.5% (17.7, 19.6)	93.4% (88.8, 96.4)
	Public Serv. Com. 1*	96.2% (93.7, 97.9)	15.9% (15.2, 16.9)	94.6% (91.0, 97.0)
	Public Serv. Com. 4*	95.7% (93.0, 97.6)	17.0% (16.2, 18.0)	93.6% (89.8, 96.5)
2021 Runoff	U.S. Senator (Perdue)	96.1% (93.6, 97.8)	19.9% (19.2, 20.9)	94.5% (90.1, 97.3)
	U.S. Senator (Loeffler)*	96.2% (93.4, 98.0)	21.0% (20.2, 22.1)	94.2% (90.3, 97.0)
	Public Serv. Com. 4*	96.2% (94.1, 97.9)	18.1% (17.5, 19.0)	94.9% (91.5, 97.2)
2022 General	U.S. Senator*	95.6% (92.6, 97.5)	21.9% (21.0, 23.3)	92.4% (86.3, 96.3)
	Governor*	95.9% (93.1, 97.9)	14.5% (13.6, 15.7)	91.6% (86.7, 95.1)
	Lt. Governor	95.6% (92.6, 97.6)	17.0% (16.1, 18.2)	92.5% (87.3, 96.0)
	Sec. of State	96.1% (94.0, 97.7)	13.1% (12.4, 14.0)	93.5% (89.8, 96.3)
	Attorney General	96.0% (93.4, 97.7)	16.6% (15.8, 17.6)	93.0% (88.2, 96.1)
	Com. Agriculture*	96.1% (93.5, 97.9)	13.9% (13.0, 15.1)	91.9% (86.7, 95.3)
	Com. Insurance*	96.6% (94.2, 98.2)	13.9% (13.0, 15.1)	92.5% (87.0, 96.0)
	Com. Labor*	95.9% (93.6, 97.8)	14.7% (13.9, 15.8)	93.3% (89.0, 96.3)
	School Super.*	95.7% (92.8, 97.6)	14.2% (13.4, 15.3)	93.3% (89.3, 96.1)

* Indicates that the Black candidate of choice was Black.

Table 5: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 13

		Black	White	Other
2012 General	U.S. President*	99.2% (98.8, 99.4)	11.8% (10.8, 12.9)	96.7% (95.0, 98.0)
2014 General	U.S. Senator	99.2% (98.8, 99.4)	14.5% (13.3, 15.9)	94.8% (91.3, 96.8)
	Governor	99.1% (98.7, 99.4)	15.0% (13.3, 16.7)	84.7% (79.9, 89.2)
	Lt. Governor*	98.9% (98.5, 99.3)	9.6% (7.9, 11.6)	68.4% (62.5, 74.0)
	Sec. of State*	98.9% (98.5, 99.3)	9.8% (8.3, 11.5)	76.5% (71.4, 81.6)
	Attorney General	98.9% (98.5, 99.3)	12.2% (10.4, 14.0)	76.8% (71.5, 82.2)
	Com. Agriculture	98.9% (98.4, 99.3)	10.2% (8.3, 12.3)	61.0% (55.0, 66.8)
	Com. Insurance*	98.9% (98.5, 99.2)	10.6% (9.0, 12.3)	79.2% (74.1, 84.4)
	Com. Labor*	99.0% (98.6, 99.3)	10.3% (8.7, 11.9)	81.3% (76.7, 85.9)
	School Super.*	99.1% (98.7, 99.4)	11.6% (10.2, 13.2)	90.3% (85.9, 94.0)
2016 General	U.S. President	99.1% (98.7, 99.4)	15.2% (13.5, 17.1)	93.2% (89.6, 96.3)
	U.S. Senator	98.6% (98.0, 99.0)	15.1% (12.7, 17.7)	64.2% (58.6, 70.2)
2018 General	Governor*	99.1% (98.8, 99.4)	16.5% (15.2, 17.9)	96.2% (94.3, 97.6)
	Lt. Governor	99.1% (98.8, 99.5)	16.0% (14.2, 18.0)	91.2% (87.8, 94.2)
	Sec. of State	99.1% (98.7, 99.4)	16.5% (14.9, 18.3)	94.1% (91.1, 96.3)
	Attorney General	99.0% (98.5, 99.3)	17.0% (15.0, 19.1)	88.8% (85.0, 92.5)
	Com. Agriculture	99.0% (98.7, 99.3)	14.7% (12.7, 17.0)	83.8% (80.2, 87.2)
	Com. Insurance*	99.1% (98.7, 99.4)	14.9% (13.1, 16.9)	93.8% (91.0, 96.3)
	Com. Labor	99.1% (98.7, 99.4)	14.6% (12.7, 16.7)	87.2% (83.6, 90.4)
	School Super.*	99.1% (98.7, 99.4)	13.9% (12.1, 15.9)	86.0% (82.6, 89.2)
	Public Serv. Com. 3	99.1% (98.7, 99.4)	17.0% (15.4, 18.8)	93.3% (90.6, 96.0)
	Public Serv. Com. 5	99.1% (98.7, 99.4)	16.0% (14.2, 18.0)	91.4% (88.3, 94.2)
2018 Runoff	Sec. of State	99.0% (98.6, 99.3)	17.0% (15.6, 18.5)	95.1% (92.5, 97.1)
	Public Serv. Com. 3	99.0% (98.5, 99.3)	19.0% (17.5, 20.7)	94.7% (91.8, 96.9)
2020 General	U.S. President	98.9% (98.5, 99.3)	22.2% (19.6, 24.9)	80.6% (77.1, 84.1)
	U.S. Senator	98.9% (98.5, 99.3)	19.1% (16.7, 21.6)	85.3% (82.0, 88.4)
	Public Serv. Com. 1*	99.0% (98.6, 99.3)	17.5% (15.0, 20.1)	84.6% (81.1, 87.9)
	Public Serv. Com. 4*	99.0% (98.7, 99.3)	17.9% (15.6, 20.2)	86.7% (83.8, 89.6)
2021 Runoff	U.S. Senator (Perdue)	99.0% (98.7, 99.3)	17.5% (16.2, 19.2)	95.8% (94.1, 97.2)
	U.S. Senator (Loeffler)*	99.1% (98.7, 99.4)	19.4% (17.9, 21.2)	95.0% (92.9, 96.8)
	Public Serv. Com. 4*	99.0% (98.7, 99.3)	15.5% (14.0, 17.7)	95.2% (92.3, 97.0)
2022 General	U.S. Senator*	99.0% (98.6, 99.3)	22.5% (20.8, 24.4)	95.1% (92.8, 97.0)
	Governor*	99.0% (98.6, 99.3)	14.9% (12.8, 17.3)	86.9% (84.0, 89.7)
	Lt. Governor	98.8% (98.4, 99.2)	17.9% (15.6, 20.7)	90.0% (86.5, 93.2)
	Sec. of State	98.9% (98.5, 99.3)	19.6% (16.8, 22.5)	71.5% (68.0, 75.1)
	Attorney General	98.9% (98.5, 99.2)	18.0% (15.6, 20.9)	87.4% (83.8, 90.6)
	Com. Agriculture*	99.0% (98.5, 99.3)	14.5% (12.6, 16.8)	88.4% (85.7, 91.1)
	Com. Insurance*	99.0% (98.6, 99.3)	15.6% (13.2, 18.2)	84.8% (81.5, 87.9)
	Com. Labor*	98.9% (98.5, 99.2)	15.0% (13.1, 17.4)	91.0% (88.0, 93.7)
	School Super.*	98.9% (98.5, 99.3)	15.7% (13.3, 18.4)	85.3% (81.9, 88.5)

* Indicates that the Black candidate of choice was Black.

Table 6: Ecological Inference Results — Estimated Vote Share of Black-Preferred Candidates — CD 14

		Black	White	Other
2012 General	U.S. President*	93.4% (88.5, 96.9)	15.8% (14.8, 17.1)	83.3% (69.3, 93.1)
2014 General	U.S. Senator	94.3% (90.0, 97.3)	16.9% (15.7, 18.7)	76.7% (52.3, 90.7)
	Governor	91.9% (86.1, 96.1)	20.6% (19.3, 22.3)	73.2% (48.1, 88.2)
	Lt. Governor*	89.0% (81.8, 94.7)	14.2% (13.1, 15.6)	77.9% (59.0, 92.4)
	Sec. of State*	93.4% (88.6, 96.8)	14.6% (13.4, 16.1)	71.7% (51.4, 87.4)
	Attorney General	91.7% (86.1, 96.0)	15.4% (14.1, 17.0)	70.8% (49.4, 88.3)
	Com. Agriculture	91.7% (85.7, 96.0)	13.9% (12.7, 15.4)	71.3% (48.9, 87.7)
	Com. Insurance*	93.1% (88.3, 96.7)	14.6% (13.6, 15.8)	76.6% (61.9, 89.4)
	Com. Labor*	92.6% (86.4, 96.3)	15.3% (14.1, 16.7)	74.2% (54.5, 89.5)
	School Super.*	93.2% (87.3, 96.9)	17.7% (16.5, 19.2)	72.2% (52.0, 88.3)
2016 General	U.S. President	96.4% (93.5, 98.3)	8.6% (8.0, 9.4)	92.8% (87.4, 96.2)
	U.S. Senator	94.0% (90.4, 97.0)	7.6% (6.9, 8.5)	89.3% (82.4, 94.0)
2018 General	Governor*	97.4% (95.1, 98.8)	9.0% (8.5, 9.7)	94.1% (89.9, 97.0)
	Lt. Governor	96.6% (94.2, 98.3)	9.3% (8.7, 10.0)	93.8% (89.4, 96.8)
	Sec. of State	96.7% (93.8, 98.6)	10.0% (9.4, 10.9)	94.1% (88.5, 97.1)
	Attorney General	96.7% (94.2, 98.5)	9.9% (9.3, 10.5)	93.8% (90.0, 96.5)
	Com. Agriculture	97.2% (95.0, 98.6)	7.7% (7.2, 8.4)	95.1% (91.7, 97.3)
	Com. Insurance*	96.9% (94.4, 98.6)	8.8% (8.3, 9.6)	95.0% (91.0, 97.5)
	Com. Labor	96.6% (94.1, 98.3)	8.5% (7.9, 9.2)	94.9% (90.9, 97.4)
	School Super.*	97.1% (94.7, 98.7)	7.8% (7.3, 8.5)	94.1% (89.7, 96.9)
	Public Serv. Com. 3	97.0% (94.4, 98.6)	9.5% (8.9, 10.3)	93.6% (88.7, 96.8)
	Public Serv. Com. 5	97.1% (94.9, 98.7)	9.0% (8.5, 9.8)	93.9% (89.4, 96.9)
2018 Runoff	Sec. of State	96.4% (93.4, 98.3)	10.9% (10.1, 11.9)	88.0% (79.4, 94.4)
	Public Serv. Com. 3	96.3% (93.4, 98.3)	12.0% (11.2, 13.2)	88.5% (76.3, 95.4)
2020 General	U.S. President	96.9% (94.6, 98.4)	9.3% (8.8, 10.0)	94.3% (91.0, 96.6)
	U.S. Senator	97.0% (95.0, 98.5)	8.7% (8.2, 9.3)	95.1% (92.2, 97.1)
	Public Serv. Com. 1*	97.0% (94.9, 98.5)	7.3% (6.7, 7.9)	94.2% (90.9, 96.5)
	Public Serv. Com. 4*	97.4% (95.7, 98.7)	7.8% (7.3, 8.4)	94.9% (92.0, 97.0)
2021 Runoff	U.S. Senator (Perdue)	96.9% (94.7, 98.5)	10.6% (10.0, 11.3)	95.0% (91.5, 97.3)
	U.S. Senator (Loeffler)*	97.0% (95.0, 98.4)	10.9% (10.4, 11.7)	94.1% (90.2, 96.7)
	Public Serv. Com. 4*	97.0% (95.1, 98.5)	9.5% (9.0, 10.1)	94.8% (91.5, 97.2)
2022 General	U.S. Senator*	97.2% (95.0, 98.6)	11.0% (10.5, 11.7)	94.7% (91.1, 97.3)
	Governor*	97.5% (95.8, 98.7)	5.5% (5.1, 6.1)	95.0% (92.1, 97.2)
	Lt. Governor	97.1% (95.0, 98.5)	7.7% (7.2, 8.3)	94.5% (91.0, 96.9)
	Sec. of State	97.1% (95.2, 98.5)	5.1% (4.6, 5.6)	95.1% (92.2, 97.2)
	Attorney General	97.1% (95.0, 98.6)	7.5% (7.0, 8.1)	95.3% (91.8, 97.6)
	Com. Agriculture*	97.0% (95.0, 98.4)	5.9% (5.4, 6.5)	94.7% (91.2, 97.1)
	Com. Insurance*	97.4% (95.6, 98.7)	6.3% (5.8, 6.8)	94.8% (91.7, 97.0)
	Com. Labor*	97.2% (95.2, 98.5)	6.6% (6.1, 7.1)	94.8% (91.7, 97.0)
	School Super.*	97.2% (95.1, 98.6)	6.2% (5.7, 6.8)	95.3% (92.5, 97.3)

* Indicates that the Black candidate of choice was Black.

Table 7: Election Results in the Focus Area — Vote Share of Black-Preferred Candidates

		Focus Area	CD 3	CD 6	CD 11	CD 13	CD 14
2012 General	U.S. President	39.5%	32.2%	28.0%	32.7%	74.8%	29.8%
2014 General	U.S. Senator	40.2%	32.2%	28.6%	32.6%	75.8%	30.7%
	Governor	40.4%	32.6%	27.9%	32.7%	75.0%	33.1%
	Lt. Governor	36.1%	28.1%	24.1%	28.1%	71.8%	27.8%
	Sec. of State	36.8%	28.8%	24.6%	28.9%	72.6%	28.4%
	Attorney General	37.3%	29.7%	24.8%	29.0%	73.3%	28.7%
	Com. Agriculture	35.9%	28.0%	23.8%	28.1%	71.3%	27.5%
	Com. Insurance	37.3%	29.1%	25.0%	29.3%	73.3%	28.7%
	Com. Labor	37.4%	29.2%	24.9%	29.5%	73.3%	29.0%
	School Super.	39.1%	30.9%	27.0%	31.5%	74.6%	30.9%
2016 General	U.S. President	41.8%	31.6%	35.8%	36.7%	77.7%	27.8%
	U.S. Senator	37.7%	28.7%	28.9%	32.2%	73.7%	26.4%
2018 General	Governor	44.7%	32.8%	38.6%	40.0%	80.9%	30.1%
	Lt. Governor	43.9%	32.3%	37.4%	39.3%	79.9%	30.1%
	Sec. of State	44.6%	33.1%	37.9%	39.7%	80.5%	30.7%
	Attorney General	44.3%	33.3%	37.5%	39.5%	79.8%	30.6%
	Com. Agriculture	42.6%	31.3%	35.5%	37.6%	78.7%	29.2%
	Com. Insurance	43.7%	32.1%	36.7%	38.6%	80.2%	30.0%
	Com. Labor	43.0%	31.6%	35.8%	38.0%	79.2%	29.7%
	School Super.	42.4%	31.1%	34.8%	37.3%	78.9%	29.1%
	Public Serv. Com. 3	44.5%	32.9%	37.6%	39.6%	80.6%	30.3%
	Public Serv. Com. 5	43.9%	32.3%	36.8%	38.8%	80.2%	30.1%
2018 Runoff	Sec. of State	41.6%	30.4%	36.5%	35.8%	76.9%	28.3%
	Public Serv. Com. 3	42.6%	31.4%	37.5%	37.0%	77.4%	29.1%
2020 General	U.S. President	45.7%	34.7%	42.3%	42.3%	80.3%	31.2%
	U.S. Senator	44.7%	33.8%	39.9%	40.9%	80.4%	30.8%
	Public Serv. Com. 1	43.4%	32.6%	37.8%	39.2%	80.1%	29.6%
	Public Serv. Com. 4	44.0%	33.1%	38.3%	39.8%	80.5%	30.2%
2021 Runoff	U.S. Senator (Perdue)	46.1%	35.2%	40.5%	41.7%	82.2%	32.3%
	U.S. Senator (Loeffler)	46.6%	35.6%	41.3%	42.4%	82.5%	32.4%
	Public Serv. Com. 4	45.1%	34.1%	38.8%	40.5%	81.7%	31.5%
2022 General	U.S. Senator	46.6%	35.3%	42.7%	42.4%	83.4%	31.9%
	Governor	41.8%	31.3%	36.0%	37.0%	80.6%	27.8%
	Lt. Governor	43.4%	32.4%	38.4%	38.8%	81.5%	29.2%
	Sec. of State	41.0%	30.8%	34.5%	36.3%	79.1%	27.5%
	Attorney General	43.1%	32.4%	37.9%	38.6%	81.2%	29.2%
	Com. Agriculture	41.6%	30.8%	35.5%	36.5%	80.8%	27.9%
	Com. Insurance	41.6%	31.2%	35.4%	36.7%	80.3%	28.3%
	Com. Labor	42.2%	31.5%	36.3%	37.3%	81.2%	28.4%
	School Super.	41.7%	31.1%	35.6%	37.0%	80.4%	28.3%

Table 8: Vote Share of Black-Preferred Candidates — Illustrative Map

		CD 6
2012 General	U.S. President	62.3%
2014 General	U.S. Senator	62.7%
	Governor	62.0%
	Lt. Governor	58.2%
	Sec. of State	58.9%
	Attorney General	58.9%
	Com. Agriculture	57.6%
	Com. Insurance	59.8%
	Com. Labor	59.7%
	School Super.	61.3%
2016 General	U.S. President	67.0%
	U.S. Senator	61.8%
2018 General	Governor	70.6%
	Lt. Governor	69.4%
	Sec. of State	70.1%
	Attorney General	69.3%
	Com. Agriculture	67.8%
	Com. Insurance	69.5%
	Com. Labor	68.3%
	School Super.	67.9%
	Public Serv. Com. 3	70.1%
	Public Serv. Com. 5	69.4%
2018 Runoff	Sec. of State	65.7%
	Public Serv. Com. 3	66.3%
2020 General	U.S. President	71.1%
	U.S. Senator	70.4%
	Public Serv. Com. 1	69.5%
	Public Serv. Com. 4	70.0%
2021 Runoff	U.S. Senator (Perdue)	71.7%
	U.S. Senator (Loeffler)	72.2%
	Public Serv. Com. 4	70.8%

Table 9: List of Candidates in Statewide Elections, 2012–2022

		Democratic Candidate	Dem. Cand. Race	Republican Candidate	Rep. Cand. Race
2012 General	U.S. President	Barack Obama	Black	Mitt Romney	White
2014 General	U.S. Senator	Michelle Nunn	White	David Perdue	White
	Governor	Jason Carter	White	John Nathan Deal	White
	Lt. Governor	Connie Stokes	Black	L. S. 'Casey' Cagle	White
	Sec. of State	Doreen Carter	Black	Brian Kemp	White
	Attorney General	Gregory Hecht	White	Samuel Olens	White
	Com. Agriculture	Christopher Irvin	White	Gary Black	White
	Com. Insurance	Elizabeth Johnson	Black	Ralph Hudgens	White
	Com. Labor	Robbin Shipp	Black	J. Mark Butler	White
	School Super.	Valarie Wilson	Black	Richard Woods	White
2016 General	U.S. President	Hillary Clinton	White	Donald Trump	White
	U.S. Senator	Jim Barksdale	White	Johnny Isakson	White
2018 General	Governor	Stacey Abrams	Black	Brian Kemp	White
	Lt. Governor	Sarah Riggs Amico	White	Geoff Duncan	White
	Sec. of State	John Barrow	White	Brad Raffensperger	White
	Attorney General	Charlie Bailey	White	Chris Carr	White
	Com. Agriculture	Fred Swann	White	Gary Black	White
	Com. Insurance	Janice Laws	Black	Jim Beck	White
	Com. Labor	Richard Keatley	White	Mark Butler	White
	School Super.	Otha Thornton	Black	Richard Woods	White
	Public Serv. Com. 3	Lindy Miller	White	Chuck Eaton	White
	Public Serv. Com. 5	Dawn Randolph	White	Tricia Pridemore	White
2018 Runoff	Sec. of State	John Barrow	White	Brad Raffensperger	White
	Public Serv. Com. 3	Lindy Miller	White	Chuck Eaton	White
2020 General	U.S. President	Joe Biden	White	Donald Trump	White
	U.S. Senator	Jon Ossoff	White	David Perdue	White
	Public Serv. Com. 1	Robert Bryant	Black	Jason Shaw	White
	Public Serv. Com. 4	Daniel Blackman	Black	Lauren McDonald	White
2021 Runoff	U.S. Senator (Perdue)	Jon Ossoff	White	David Perdue	White
	U.S. Senator (Loeffler)	Raphael Warnock	Black	Kelly Loeffler	White
	Public Serv. Com. 4	Daniel Blackman	Black	Lauren McDonald	White
2022 General	U.S. Senator	Raphael Warnock	Black	Herschel Junior Walker	Black
	Governor	Stacey Abrams	Black	Brian Kemp	White
	Lt. Governor	Charlie Bailey	White	Burt Jones	White
	Sec. of State	Bee Nguyen	Asian	Brad Raffensperger	White
	Attorney General	Jennifer "Jen" Jordan	White	Chris Carr	White
	Com. Agriculture	Nakita Hemingway	Black	Tyler Harper	White
	Com. Insurance	Janice Laws Robinson	Black	John King	White
	Com. Labor	William "Will" Boddie, Jr	Black	Bruce Thompson	White
	School Super.	Alisha Thomas Searcy	Black	Richard Woods	White

* Excludes candidates in the 2020 Special Election for U.S. Senate

Maxwell Palmer

CONTACT	<p>Department of Political Science Boston University 232 Bay State Road Boston, MA 02215</p> <p><i>E-mail:</i> mbpalmer@bu.edu <i>Website:</i> www.maxwellpalmer.com <i>Phone:</i> (617) 358-2654</p>
APPOINTMENTS	<p>Boston University, Boston, Massachusetts</p> <p>Associate Professor, Department of Political Science, 2021–Present</p> <p>Director of Advanced Programs, Dept. of Political Science, 2020–Present</p> <p>Civic Tech Fellow, Faculty of Computing & Data Sciences, 2021–Present</p> <p>Faculty Fellow, Initiative on Cities, 2019–Present</p> <p>Assistant Professor, Department of Political Science, 2014–2021</p> <p>Junior Faculty Fellow, Hariri Institute for Computing, 2017–2020</p>
EDUCATION	<p>Harvard University, Cambridge, Massachusetts</p> <p>Ph.D., Political Science, May 2014.</p> <p>A.M., Political Science, May 2012.</p> <p>Bowdoin College, Brunswick, Maine</p> <p>A.B., Mathematics & Government and Legal Studies, May 2008.</p>
BOOK	<p><i>Neighborhood Defenders: Participatory Politics and America's Housing Crisis</i> (with Katherine Levine Einstein and David M. Glick). 2019. New York, NY: Cambridge University Press.</p> <ul style="list-style-type: none"> – Selected chapters republished in <i>Political Science Quarterly</i>. – Reviewed in <i>Perspectives on Politics</i>, <i>Political Science Quarterly</i>, <i>Economics 21</i>, <i>Public Books</i>, and <i>City Journal</i>. – Covered in Vox's "The Weeds" podcast, CityLab, Slate's "Gabfest," Curbed, Brookings Institution Up Front.
REFEREED ARTICLES	<p>Einstein, Katherine Levine, Joseph Ornstein, and Maxwell Palmer. 2022. "Who Represents the Renters?" <i>Housing Policy Debate</i>.</p> <p>Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2022. "Developing a pro-housing movement? Public distrust of developers, fractured coalitions, and the challenges of measuring political power." <i>Interest Groups & Advocacy</i> 11:189–208.</p>

Einstein, Katherine Levine, David Glick, Luisa Godinez Puig, and Maxwell Palmer. 2022. "Still Muted: The Limited Participatory Democracy of Zoom Public Meetings." *Urban Affairs Review*.

Glick, David M. and Maxwell Palmer. 2022. "County Over Party: How Governors Prioritized Geography Not Particularism in the Distribution of Opportunity Zones." *British Journal of Political Science* 52(4): 1902–1910.

de Benedictis-Kessner, Justin and Maxwell Palmer. 2021. "Driving Turnout: The Effect of Car Ownership on Electoral Participation." *Political Science Research and Methods*.

Einstein, Katherine Levine and Maxwell Palmer. 2021. "Land of the Freeholder: How Property Rights Make Voting Rights." *Journal of Historical Political Economy* 1(4): 499–530.

Godinez Puig, Luisa, Katharine Lusk, David Glick, Katherine L. Einstein, Maxwell Palmer, Stacy Fox, and Monica L. Wang. 2020. "Perceptions of Public Health Priorities and Accountability Among US Mayors." *Public Health Reports* (October 2020).

Einstein, Katherine Levine, David M. Glick, and Maxwell Palmer. 2020. "Can Mayors Lead on Climate Change? Evidence from Six Years of Surveys." *The Forum* 18(1).

Ban, Pamela, Maxwell Palmer, and Benjamin Schneer. 2019. "From the Halls of Congress to K Street: Government Experience and its Value for Lobbying." *Legislative Studies Quarterly* 44(4): 713–752.

Palmer, Maxwell and Benjamin Schneer. 2019. "Postpolitical Careers: How Politicians Capitalize on Public Office." *Journal of Politics* 81(2): 670–675.

Einstein, Katherine Levine, Maxwell Palmer, and David M. Glick. 2019. "Who Participates in Local Government? Evidence from Meeting Minutes." *Perspectives on Politics* 17(1): 28–46.

- Winner of the **Heinz Eulau Award**, American Political Science Association, 2020.

Einstein, Katherine Levine, David M. Glick, and Maxwell Palmer. 2019. "City Learning: Evidence of Policy Information Diffusion From a Survey of U.S. Mayors." *Political Research Quarterly* 72(1): 243–258.

Einstein, Katherine Levine, David M. Glick, Maxwell Palmer, and Robert Pressel. 2018. "Do Mayors Run for Higher Office? New Evidence on Progressive Ambition." *American Politics Research* 48(1) 197–221.

Ansolabehere, Stephen, Maxwell Palmer and Benjamin Schneer. 2018. “**Divided Government and Significant Legislation, A History of Congress from 1789-2010.**” *Social Science History* 42(1): 81–108.

Edwards, Barry, Michael Crespín, Ryan D. Williamson, and Maxwell Palmer. 2017. “**Institutional Control of Redistricting and the Geography of Representation.**” *Journal of Politics* 79(2): 722–726.

Palmer, Maxwell. 2016. “**Does the Chief Justice Make Partisan Appointments to Special Courts and Panels?**” *Journal of Empirical Legal Studies* 13(1): 153–177.

Palmer, Maxwell and Benjamin Schneer. 2016. “**Capitol Gains: The Returns to Elected Office from Corporate Board Directorships.**” *Journal of Politics* 78(1): 181–196.

Gerring, John, Maxwell Palmer, Jan Teorell, and Dominic Zarecki. 2015. “**Demography and Democracy: A Global, District-level Analysis of Electoral Contestation.**” *American Political Science Review* 109(3): 574–591.

OTHER PUBLICATIONS

Einstein, Katherine Levine, David M. Glick and Maxwell Palmer. 2020. “**Neighborhood Defenders: Participatory Politics and America’s Housing Crisis.**” *Political Science Quarterly* 135(2): 281–312.

Ansolabehere, Stephen and Maxwell Palmer. 2016. “**A Two Hundred-Year Statistical History of the Gerrymander.**” *Ohio State Law Journal* 77(4): 741–762.

Ansolabehere, Stephen, Maxwell Palmer, and Benjamin Schneer. 2016. “**What Has Congress Done?**” in *Governing in a Polarized Age: Elections, Parties, and Political Representation in America*, eds. Alan Gerber and Eric Schickler. New York, NY: Cambridge University Press.

POLICY REPORTS

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2022. **Looking back on ARPA and America’s Cities: A Menino Survey Reflection.** Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine and Maxwell Palmer. 2022. **Representation in the Housing Process: Best Practices for Improving Racial Equity.** Research Report. The Boston Foundation.

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2022. **2021 Menino Survey of Mayors: Closing the Racial Wealth Gap.** Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, and Maxwell Palmer. 2021. **2021**

Menino Survey of Mayors: Building Back Better. Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, Maxwell Palmer, Stacy Fox, Katharine Lusk, Nicholas Henninger, and Songhyun Park. 2021. **2020 Menino Survey of Mayors: Policing and Protests.** Research Report. Boston University Initiative on Cities.

Glick, David M., Katherine Levine Einstein, Maxwell Palmer, and Stacy Fox. 2020. **2020 Menino Survey of Mayors: COVID-19 Recovery and the Future of Cities.** Research Report. Boston University Initiative on Cities.

de Benedictis-Kessner, Justin and Maxwell Palmer. 2020. **Got Wheels? How Having Access to a Car Impacts Voting.** *Democracy Docket*.

Palmer, Maxwell, Katherine Levine Einstein, and David Glick. 2020. **Counting the City: Mayoral Views on the 2020 Census.** Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine, Maxwell Palmer, Stacy Fox, Marina Berardino, Noah Fischer, Jackson Moore-Otto, Aislinn O'Brien, Marilyn Rutecki and Benjamin Wuesthoff. 2020. **COVID-19 Housing Policy.** Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine, Maxwell Palmer, David Glick, and Stacy Fox. 2020. **Mayoral Views on Cities' Legislators: How Representative are City Councils?** Research Report. Boston University Initiative on Cities.

Einstein, Katherine Levine and Maxwell Palmer. 2020. **"Newton and other communities must reform housing approval process."** *The Boston Globe*.

Einstein, Katherine Levine, David Glick, Maxwell Palmer and Stacy Fox. 2020. **"2019 Menino Survey of Mayors."** Research Report. Boston University Initiative on Cities.

Palmer, Maxwell, Katherine Levine Einstein, David Glick, and Stacy Fox. 2019. **Mayoral Views on Housing Production: Do Planning Goals Match Reality?** Research Report. Boston University Initiative on Cities.

Wilson, Graham, David Glick, Katherine Levine Einstein, Maxwell Palmer, and Stacy Fox. 2019. **Mayoral Views on Economic Incentives: Valuable Tools or a Bad Use of Resources?.** Research Report. Boston University Initiative on Cities

Einstein, Katherine Levine, David Glick, Maxwell Palmer and Stacy Fox. 2019. **"2018 Menino Survey of Mayors."** Research Report. Boston University Initiative

on Cities.

Einstein, Katherine Levine, Katharine Lusk, David Glick, Maxwell Palmer, Christiana McFarland, Leon Andrews, Aliza Wasserman, and Chelsea Jones. 2018. *“Mayoral Views on Racism and Discrimination.”* National League of Cities and Boston University Initiative on Cities.

Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2018. *“As the Trump administration retreats on climate change, US cities are moving forward.”* The Conversation.

Einstein, Katherine Levine, David M. Glick, Maxwell Palmer, and Robert Presel. 2018. *“Few big-city mayors see running for higher office as appealing.”* LSE United States Politics and Policy Blog.

Einstein, Katherine Levine, David Glick, and Maxwell Palmer. 2018. *“2017 Menino Survey of Mayors.”* Research Report. Boston University Initiative on Cities.

Williamson, Ryan D., Michael Crespin, Maxwell Palmer, and Barry C. Edwards. 2017. *“This is how to get rid of gerrymandered districts.”* *The Washington Post*, Monkey Cage Blog.

Palmer, Maxwell and Benjamin Schneer. 2015. *“How and why retired politicians get lucrative appointments on corporate boards.”* *The Washington Post*, Monkey Cage Blog.

CURRENT PROJECTS

“A Partisan Solution to Partisan Gerrymandering: The Define-Combine Procedure” (with Benjamin Schneer and Kevin DeLuca).

– Covered in *Fast Company*

“Descended from Immigrants and Revolutionists: How Family Immigration History Shapes Legislative Behavior in Congress” (with James Feigenbaum and Benjamin Schneer).

“The Gender Pay Gap in Congressional Offices” (with Joshua McCrain).

“Racial Disparities in Local Elections” (with Katherine Levine Einstein).

“Renters in an Ownership Society: Property Rights, Voting Rights, and the Making of American Citizenship.” Book Project. With Katherine Levine Einstein.

“Menino Survey of Mayors 2021.” Co-principal investigator with David M. Glick and Katherine Levine Einstein.

GRANTS
AND AWARDS

The Boston Foundation Grant. “2022 Greater Boston Housing Report Card” (Co-principal investigator). 2022. \$70,000.

The Rockefeller Foundation, “Menino Survey of Mayors” (Co-principal investigator). 2021. \$355,000.

American Political Science Association, **Heinz Eulau Award**, for the best article published in *Perspectives on Politics* during the previous calendar year, for “**Who Participates in Local Government? Evidence from Meeting Minutes.**” (with Katherine Levine Einstein and David M. Glick). 2020.

Boston University Initiative on Cities, COVID-19 Research to Action Seed Grant. “How Are Cities Responding to the COVID-19 Housing Crisis?” 2020. \$8,000.

The Rockefeller Foundation, “Menino Survey of Mayors” (Co-principal investigator). 2017. \$325,000.

Hariri Institute for Computing, Boston University. Junior Faculty Fellow. 2017–2020. \$10,000.

The Rockefeller Foundation, “2017 Menino Survey of Mayors” (Co-principal investigator). 2017. \$100,000.

The Center for Finance, Law, and Policy, Boston University, Research Grant for “From the Capitol to the Boardroom: The Returns to Office from Corporate Board Directorships,” 2015.

Senator Charles Sumner Prize, Dept. of Government, Harvard University. 2014.
Awarded to the best dissertation “from the legal, political, historical, economic, social or ethnic approach, dealing with means or measures tending toward the prevention of war and the establishment of universal peace.”

The Center for American Political Studies, Dissertation Research Fellowship on the Study of the American Republic, 2013–2014.

The Tobin Project, Democracy and Markets Graduate Student Fellowship, 2013–2014.

The Dirksen Congressional Center, Congressional Research Award, 2013.

The Institute for Quantitative Social Science, Conference Travel Grant, 2014.

The Center for American Political Studies, Graduate Seed Grant for “Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” 2014.

The Institute for Quantitative Social Science, Research Grant, 2013.

Bowdoin College: High Honors in Government and Legal Studies; Philo Sherman Bennett Prize for Best Honors Thesis in the Department of Government, 2008.

SELECTED
PRESENTATIONS

“A Partisan Solution to Partisan Gerrymandering: The Define-Combine Procedure.” MIT Election Data and Science Lab, 2020.

“Who Represents the Renters?” Local Political Economy Conference, Washington, D.C., 2019.

“Housing and Climate Politics,” Sustainable Urban Systems Conference, Boston University 2019.

“Redistricting and Gerrymandering,” American Studies Summer Institute, John F. Kennedy Presidential Library and Museum, 2019.

“The Participatory Politics of Housing,” Government Accountability Office Seminar, 2018.

“Descended from Immigrants and Revolutionists: How Immigrant Experience Shapes Immigration Votes in Congress,” Congress and History Conference, Princeton University, 2018.

“Identifying Gerrymanders at the Micro- and Macro-Level.” Hariri Institute for Computing, Boston University, 2018.

“How Institutions Enable NIMBYism and Obstruct Development,” Boston Area Research Initiative Spring Conference, Northeastern University, 2017.

“Congressional Gridlock,” American Studies Summer Institute, John F. Kennedy Presidential Library and Museum, 2016.

“Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” Microeconomics Seminar, Department of Economics, Boston University, 2015.

“A Two Hundred-Year Statistical History of the Gerrymander,” Congress and History Conference, Vanderbilt University, 2015.

“A New (Old) Standard for Geographic Gerrymandering,” Harvard Ash Center Workshop: How Data is Helping Us Understand Voting Rights After Shelby County, 2015.

“Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” Boston University Center for Finance, Law, and Policy, 2015.

“Capitol Gains: The Returns to Elected Office from Corporate Board Directorships,” Bowdoin College, 2014.

American Political Science Association: 2013, 2014, 2015, 2016, 2018, 2019, 2020

Midwestern Political Science Association: 2012, 2013, 2014, 2017, 2019

Southern Political Science Association: 2015, 2018

European Political Science Association: 2015

EXPERT
TESTIMONY
AND CONSULTING

Bethune-Hill v. Virginia (3:14-cv-00852-REP-AWA-BMK), U.S. District Court for the Eastern District of Virginia. Prepared expert reports and testified on racial predominance and racially polarized voting in selected districts of the 2011 Virginia House of Delegates map. (2017)

Thomas v. Bryant (3:18-CV-441-CWR-FKB), U.S. District Court for the Southern District of Mississippi. Prepared expert reports and testified on racially polarized voting in a district of the 2012 Mississippi State Senate map. (2018–2019)

Chestnut v. Merrill (2:18-cv-00907-KOB), U.S. District Court for the Northern District of Alabama. Prepared expert reports and testified on racially polarized voting in selected districts of the 2011 Alabama congressional district map. (2019)

Dwight v. Raffensperger (No. 1:18-cv-2869-RWS), U.S. District Court for the Northern District of Georgia. Prepared expert reports and testified on racially polarized voting in selected districts of the 2011 Georgia congressional district map. (2019)

Bruni, et al. v. Hughs (No. 5:20-cv-35), U.S. District Court for the Southern District of Texas. Prepared expert reports and testified on the use of straight-ticket voting by race and racially polarized voting in Texas. (2020)

Caster v. Merrill (No. 2:21-cv-1536-AMM), U.S. District Court for the Northern District of Alabama. Prepared expert report and testified on racially polarized voting in selected districts of the 2021 Alabama congressional district map. (2022)

Pendergrass v. Raffensperger (1:21-CV-05339-SCJ), U.S. District Court for the Northern District of Georgia. Prepared expert reports and testified on racially polarized voting in selected districts of the 2021 Georgia congressional district map. (2022)

Grant v. Raffensperger (1:22-CV-00122-SCJ), U.S. District Court for the Northern District of Georgia. Prepared expert reports and testified on racially polarized voting in selected districts of the 2021 Georgia state legislative district maps.

(2022)

Galmon, et al. v. Ardoin (3:22-cv-00214-SDD-SDJ), U.S. District Court for the Middle District of Louisiana. Prepared expert reports and testified on racially polarized voting for the 2021 Louisiana congressional district map. (2022)

Racially Polarized Voting Consultant, Virginia Redistricting Commission, August 2021.

The General Court of the Commonwealth of Massachusetts, Joint Committee on Housing, Hearing on Housing Production Legislation. May 14, 2019. Testified on the role of public meetings in housing production.

TEACHING

Boston University

- *Introduction to American Politics* (PO 111; Fall 2014, Fall 2015, Fall 2016, Fall 2017, Spring 2019, Fall 2019, Fall 2020)
- *Congress and Its Critics* (PO 302; Fall 2014, Spring 2015, Spring 2017, Spring 2019)
- *Data Science for Politics* (PO 399; Spring 2020, Spring 2021, Fall 2021, Fall 2022)
- *Formal Political Theory* (PO 501; Spring 2015, Spring 2017, Fall 2019, Fall 2020)
- *American Political Institutions in Transition* (PO 505; Spring 2021, Fall 2021)
- *Prohibition* (PO 540; Fall 2015, Fall 2022)
- *Political Analysis (Graduate Seminar)* (PO 840; Fall 2016, Fall 2017)
- *Graduate Research Workshop* (PO 903/4; Fall 2019, Spring 2020)

SERVICE

Boston University

- Research Computing Governance Committee, 2021–.
- Initiative on Cities Faculty Advisory Board, 2020–2022.
- Undergraduate Assessment Working Group, 2020-2021.
- College of Arts and Sciences
 - Search Committee for the Faculty Director of the Initiative on Cities, 2020–2021.
 - General Education Curriculum Committee, 2017–2018.
- Department of Political Science
 - Director of Advanced Programs (Honors & B.A./M.A.). 2020–.
 - Political Methodology Search Committee, 2021.

- Delegate, Chair Selection Advisory Process, 2021.
- Comprehensive Exam Committee, American Politics, 2019.
- Comprehensive Exam Committee, Political Methodology, 2016, 2017, 2021.
- Co-organizer, Research in American Politics Workshop, 2016–2018.
- American Politics Search Committee, 2017.
- American Politics Search Committee, 2016.
- Graduate Program Committee, 2014–2015, 2018–2019, 2020–2021.

Co-organizer, *Boston University Local Political Economy Conference*, August 29, 2018.

Editorial Board Member, *Legislative Studies Quarterly*, 2020–Present

Malcolm Jewell Best Graduate Student Paper Award Committee, Southern Political Science Association, 2019.

Reviewer: *American Journal of Political Science*; *American Political Science Review*; *Journal of Politics*; *Quarterly Journal of Political Science*; *Science*; *Political Analysis*; *Legislative Studies Quarterly*; *Public Choice*; *Political Science Research and Methods*; *Journal of Law, Economics and Organization*; *Election Law Journal*; *Journal of Empirical Legal Studies*; *Urban Affairs Review*; *Applied Geography*; *PS: Political Science & Politics*; Cambridge University Press; Oxford University Press.

Elected Town Meeting Member, Town of Arlington, Mass., Precinct 2. April 2021–Present.

Arlington Election Reform Committee Member, August 2019–April 2022.

Coordinator, **Harvard Election Data Archive**, 2011–2014.

OTHER EXPERIENCE

Charles River Associates, Boston, Massachusetts 2008–2010

Associate, Energy & Environment Practice

Economic consulting in the energy sector for electric and gas utilities, private equity, and electric generation owners. Specialized in Financial Modeling, Resource Planning, Regulatory Support, Price Forecasting, and Policy Analysis.

Updated December 12, 2022

EXHIBIT 3

Supplemental Expert Report of Dr. Maxwell Palmer

Pendergrass v. Raffensperger (N.D. Ga.)

December 22, 2022

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SUPPLEMENTAL EXPERT REPORT OF MAXWELL PALMER, PH.D.

I, Dr. Maxwell Palmer, declare as follows:

1. In my original report in this matter I examined racially polarized voting in Northwest Georgia. I analyzed statewide elections across five congressional districts (the 3rd, 6th, 11th, 13th, and 14th Districts) and found high levels of racially polarized voting across the focus area as a whole and each individual district.
2. I have been asked to supplement my original report by analyzing the congressional election results within each of these five districts in the 2022 general election. These elections are commonly referred to as “endogenous elections.”
3. In this supplemental report I rely on the same data (precinct-level election results and precinct-level voter turnout by race) as in my original report. I use the same methodology (ecological inference) to perform my analysis.
4. I find strong evidence of racially polarized voting across each of the five congressional districts in the focus area. Black and White voters supported different candidates in all five districts. Black-preferred candidates for Congress were defeated in the 3rd, 6th, 11th, and 14th Congressional Districts, and won election only in the majority-Black 13th Congressional District.
5. Figure 1 presents the estimates of support for the Black-preferred candidate for Black and White voters for each congressional election in 2022. Full results for each election are presented in Table 1. Figure 1 shows that the estimates for support for Black-preferred candidates by Black voters are all significantly above 50%. Black voters are extremely cohesive, with a clear candidate of choice in all five districts. White voters are highly cohesive in voting in *opposition* to the Black-preferred candidate in every district.

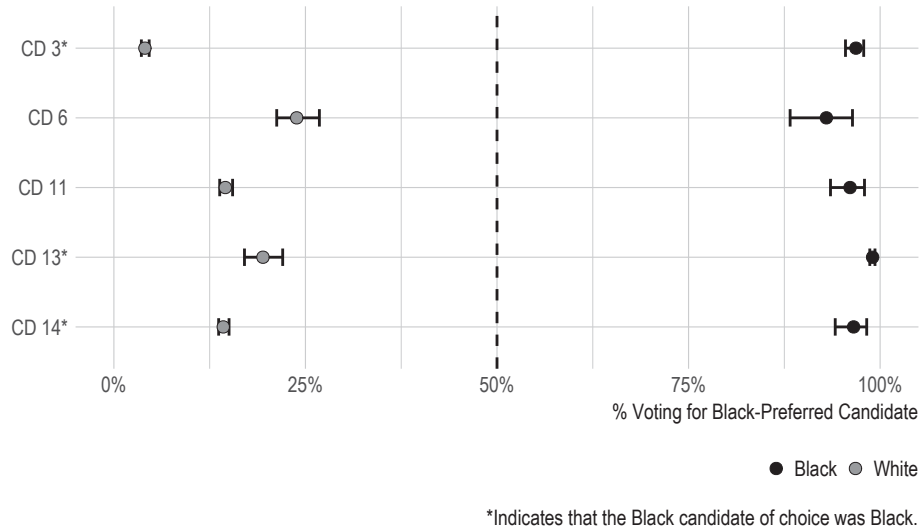


Figure 1: Racially Polarized Voting Estimates by Congressional District

Table 1: Ecological Inference Results

District	Black	White	Other
CD 3*	96.8% (95.5, 97.9)	4.1% (3.6, 4.6)	92.3% (89.2, 94.8)
CD 6	93.0% (88.3, 96.4)	23.9% (21.3, 26.8)	65.6% (55.9, 74.0)
CD 11	96.1% (93.5, 98.0)	14.5% (13.8, 15.5)	94.4% (90.9, 97.0)
CD 13*	99.0% (98.7, 99.3)	19.5% (17.0, 22.0)	88.9% (85.6, 92.1)
CD 14*	96.5% (94.1, 98.2)	14.3% (13.7, 15.0)	93.9% (89.6, 96.9)

* Indicates that the Black candidate of choice was Black.

Table 2: Congressional Candidates and Election Results

District	Dem. Candidate	Dem. Cand. Race	Dem. %	Rep. Candidate	Rep. Cand. Race	Rep. %
CD 3	Val Almonord	Black	31.3%	Drew Ferguson	White	68.7%
CD 6	Bob Christian	White	37.8%	Rich McCormick	White	62.2%
CD 11	Antonio Daza	Latino	37.4%	Barry Loudermilk	White	62.6%
CD 13	David Scott	Black	81.8%	Caesar Gonzales	Latino	18.2%
CD 14	Marcus Flowers	Black	34.1%	Marjorie Taylor Greene	White	65.9%

EXHIBIT 4

***Pendergrass et al. v. Raffensperger, et al.*, No. 1:21-cv-05339**
United States District Court for the Northern District of Georgia
Expert Report of Orville Vernon Burton, Ph.D.

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

Dr. Orville Vernon Burton

December 5, 2022

I. STATEMENT OF INQUIRY

I have been asked by Plaintiffs' counsel to serve as an expert witness in litigation concerning Georgia redistricting. Plaintiffs' counsel asked me to analyze the history of voting-related discrimination in Georgia and to contextualize and put in historical perspective such discrimination. I have also been asked to analyze the relationship between race and partisanship in Georgia politics.

I am being compensated at \$350 per hour for my work on this case. My compensation is not contingent on or affected by the substance of my opinions or the outcome of this case.

II. SUMMARY OF FINDINGS

Throughout Georgia's history, and through today, the state of Georgia has attempted, often successfully, to minimize the electoral influence of minority voters and particularly of Black Georgians. Voting rights in Georgia have followed a pattern where after periods of increased nonwhite voter registration and turnout, the state, through both legislation and extralegal means, finds methods to disfranchise and reduce the influence of minority voters.

This history has its roots in the Reconstruction era. As soon as formerly enslaved men gained the right to vote in Georgia, both violence and wholesale changes in voter registration laws ensured they could not vote. By the early 20th century, the cumulative effects of the poll tax and the white primary had nearly removed all Black Georgians from voter registration lists. Around this time, Georgia also structured its elections to the disadvantage of Black Georgians. Specifically, Georgia's county unit system, introduced in 1917 until it was outlawed by the Supreme Court in the 1960s, gave a greater share of proportion of votes to small, rural, and much whiter counties, compared to larger and more urban counties, where the majority of Black Georgia voters lived.

When the Supreme Court eventually ruled against white-only primaries in the 1940s, Georgia worked to circumvent the ability of those citizens to vote through registration schemes, voter challenges, voter purges, and more. And when the county-unit system fell, Georgia replaced them with at-large districts and majority vote requirements, systems designed to ensure that Black candidates could not be elected to office. Those systems were wildly effective: By the time of the 1964 Civil Rights Act (CRA) and the 1965 Voting Rights Act (VRA), while Black Georgians were 34 percent of the voting age population, there were only three Black elected officials in Georgia.

Even after the Voting Rights Act of 1965, Black voters and Black elected officials in Georgia continued to be systematically underrepresented. To neutralize Black voting strength, Georgia officials used an array of mechanisms to block, discourage, dilute, or otherwise prevent or limit Black voting in Georgia. Between 1965-1980, nearly 30% of all of the Department of Justice's objections to voting-related changes under Section 5 were attributable to Georgia alone.

For the next forty years, Georgia failed to go a redistricting cycle without objection from the Department of Justice (DOJ). Georgia's congressional reapportionment in 1971, for example, was the first held under Section 5 preclearance rules, and it showed, as one expert has described, "the extraordinary lengths to which the legislature was prepared to go to exclude Blacks from the congressional delegation." After DOJ refused to preclear the plan and required Georgia to implement a new congressional plan, Andrew Young became the only Black U.S. Congressman from Georgia and the first African American elected to the United States House of Representatives from the South in the twentieth century (along with Barbara Jordan of Texas, significantly both Black candidates were elected from urban districts). In the redistricting cycle after the 1980 census, the Georgia General Assembly again tried to limit Black voting strength in Atlanta. DOJ again refused to preclear the plan; John Lewis eventually won the seat that was created under the revised congressional plan. When Congress did re-authorize the VRA in 1982, it cited systemic abuses by Georgia officials to evade Black voting rights.

Notably, the tactics that have plagued Georgia's history to dilute the power of Black Georgians have persisted into the modern era. These policies around voting have also come at a time of rapid demographic shifts in Georgia's electorate: Georgia is the only state in the Deep South where the percentage of the Black population has sharply increased over the past half century. In just the past ten years, much of it in the wake of *Shelby County v. Holder* (2013), Georgia has slashed polling places by the hundreds (primarily in Black communities), increased voter purges and challenges against minority voters, launched state-sponsored investigations against minority voting groups, and more. In just the past year, Georgia enacted Senate Bill 202, a law DOJ could no longer stop under preclearance but which DOJ has alleged was passed with the intent and effect of limiting Black Georgians' voting power. While that suit remains to be litigated, the state has already begun replacing Black office holders in majority-Black counties and implementing policies to the disadvantage of Black Georgians.

The history of Georgia demonstrates a clear pattern, one that attempts (and often succeeds) in diluting and impairing Black Georgians' voting power. Georgia's recently enacted congressional plan must be viewed in this context.

This pattern, moreover, is reflected in Georgia's politics. 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 (CRA) 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 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.

III. EXPERT CREDENTIALS

A. Professional Background and Qualifications

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.

I received my undergraduate degree from Furman University in 1969 and my Ph.D. in American History from Princeton University in 1976 and have been researching and teaching American History at universities since 1971. Currently I am the Judge Matthew J. Perry Distinguished Professor of History, and Professor of Global Black Studies, Sociology and Anthropology, and Computer Science at Clemson University. From 2008 to 2010, I was the Burroughs Distinguished Professor of Southern History and Culture at Coastal Carolina University. I am emeritus University Distinguished Teacher/Scholar, Professor of History, African American Studies, and Sociology at the University of Illinois. I am a Senior Research Scientist at the National Center for Supercomputing Applications (NCSA) where I was Associate Director for Humanities and Social Sciences (2004-2010). I was also the founding Director of the Institute for Computing in Humanities, Arts, and Social Science (ICHASS) at the University of Illinois and currently chair the ICHASS Advisory Board.

I am the author or editor of more than twenty books and nearly three hundred articles, which can be found on my Curriculum Vitae attached to the end of this report. I have received a number of academic awards and honors. I was selected nationwide as the 1999 U.S. Research and Doctoral University Professor of the Year (presented by the Carnegie Foundation for the Advancement of Teaching and by the Council for Advancement and Support of Education). I have been recognized by my peers and was elected president of the Southern Historical Association and of the Agricultural History Society and elected to the Society of American Historians. In 2016, I received the College of Architecture, Art, and Humanities Dean's Award for "Excellence in Research." In 2017, I received the Governor's Award for Lifetime Achievement in the Humanities from the South Carolina Humanities Council and in 2021 I was awarded the Benjamin E. Mays Legacy Award. In 2018, I was part of the initial Clemson University Research, Scholarship and Artistic Achievement Award group of scholars. In 2022, I received the Clemson University Alumni Award for Outstanding Achievements in Research and was appointed to the South Carolina African American Heritage Commission, inducted into the Morehouse College Martin Luther King, Jr. Collegium of Scholars, and received the Southern Historical Association's most coveted award, the John Hope Franklin Lifetime Achievement Award.

My most recent book, co-authored with civil rights attorney Armand Derfner, *Justice Deferred: Race and the Supreme Court* (2021), was deemed "authoritative and highly readable" by Harvard University Law professor Randall Kennedy in his review in *The Nation*. *Justice*

Deferred was featured as a session at the November 2021 annual meetings of the Social Science History Association in Philadelphia, for a session at the April 2022 Midwestern Political Science Association meeting in Chicago and as a plenary session at the October 2022 Association for the Study of African American Life and History Association in Montgomery. Sessions on *Justice Deferred* are also scheduled for the annual meetings of the American Historical Association in January 2022 in Philadelphia and at the Organization of American History Association in March 2022 in Los Angeles. My book *The Age of Lincoln*, published in 2007, won the *Chicago Tribune* Heartland Literary Award for Nonfiction and was selected for Book of the Month Club, History Book Club, and Military Book Club. One reviewer proclaimed, “If the Civil War era was America's ‘Iliad,’ then historian Orville Vernon Burton is our latest Homer.” The book was featured at sessions of the annual meetings of the Association for the Study of African American Life and History, the Social Science History Association, and the Southern Intellectual History Circle. Among the articles I have published are several related to the issues discussed in this report and at least two law review articles address these issues directly. I was one of ten historians selected to contribute to the *Presidential Inaugural Portfolio* (January 21, 2013) by the Joint Congressional Committee on Inaugural Ceremonies. I edit two academic press series for the University of Virginia Press: *The American South Series* and the *A Nation Divided: Studies in the Civil War Era Series*.

As a scholar, I have had a long-time relationship with Georgia. I was born in Royston, and own the family farm in Madison County, Georgia. I am a recognized authority on the Georgia educator and theologian Dr. Benjamin E. Mays, who taught at Morehouse College from 1921 to 1923, was the longtime president of Morehouse College (1940-67), campaigned and was elected to the Atlanta schoolboard in 1969. The Atlanta school board members elected him president in 1970 and he served as president until he retired in 1981. My book, *In My Father House Are Many Mansions: Family and Community in Edgefield, South Carolina* (1985) is an intense study of a large section of South Carolina that is only separated from Georgia by the Savannah River, and the area has strong ties to Georgia and especially to the city of Augusta, which I have studied since before my Ph.D.

I have researched in the archives of the University of Georgia, Emory University, and Morehouse College. I have served on the Ph.D. committees, and am serving on one currently, at the University of Georgia. I gave one of Georgia’s annual humanities lectures in conjunction with

the Governor's Awards for the Humanities. I also keynoted one of the annual meetings of the Georgia Historical Society. I served on the Advisory Committee for the Atlanta History Museum to develop new exhibits on the modern South. I have been invited to present papers and talks and participate in seminars at Universities and colleges in the state of Georgia. I was invited and spoke at the Carter Center, and spoke at the University of Georgia, Augusta University, Payne College, Mercer University, gave the Crown lecture at Morehouse College, Georgia State University, Georgia Southern University, Fort Valley State University, Berry College, Emory University, the Georgia Institute of Technology, Young Harris College. I also led a workshop on teaching history for Georgia public school teachers in Athens, Georgia. Most recently, on October 12, 2022, I was invited back to Morehouse College for an academic conference. I was part of a panel discussing a special issue of *The Journal of Modern Slavery: A Multidisciplinary Exploration* 7:4 (2022) which was also issued as a book, *Slavery and its Consequences: Racism, Inequity & Exclusion in the USA*. On October 20, 2022, I returned to Georgia Southern University and spoke on "The Past, Present, and Future of Voting Rights" (with former Savannah Mayor Dr. Otis Johnson) as part of the Legacy of Slavery to Lecture series.

B. Prior Testimony

Over the past forty years, I have been retained to serve as an expert witness and consultant in numerous voting rights cases by the Voting Section of the Civil Rights Division of the United States Department of Justice (DOJ), the Voting Rights Project of the Southern Regional Office of the American Civil Liberties Union, the Brennan Center, the NAACP, the Legal Defense Fund (LDF) of the NAACP, the Mexican American Legal Defense and Educational Fund, the California Rural Legal Association, the League of United Latin American Citizens, the Lawyers' Committee for Civil Rights Under Law, the Legal Services Corporation, the Southern Poverty Law Center, and other individuals and groups.

I have extensive experience in analyzing social and economic status, discrimination, and historical intent in voting rights cases, as well as group voting behavior. I have been qualified as an expert in the fields of districting, reapportionment, and racial voting patterns and behavior in elections in the United States. My testimony has been accepted by federal courts on both statistical analysis of racially polarized voting and socioeconomic analysis of the population, as well as on the history of discrimination and the discriminatory intent of laws. For example, in 2021, my testimony and my report were cited in the Final Judgment and Order in Community Success

Initiative. v. Moore, 19 CVS 15941 (Superior Court, Wake County, March 28, 2022). In 2014, my testimony and my report was cited by the U.S. District Court for the Southern District of Texas in finding that the Texas in-person Voter ID Law was racially motivated and had a disparate effect on minorities. *See Veasey v. Perry*, 71 F.Supp.3d 627 (S.D. Tex. 2014). My testimony and reports have been cited by the U.S. Department of Justice. In 2012, for example, my report was cited by the Justice Department as a reason for their objection to the in-person South Carolina Voter ID law. *See* Dkt. 118-1, *South Carolina v. United States*, No. 1:12-cv-00203-CKK-BMK-JDB (D.D.C. June 29, 2012).

To the best of my knowledge and memory, in the last five or so years I have given testimony and/or depositions in the following cases: (i) *Pendergrass v. Raffensperger*, 1:21-cv-05339 (N.D. Ga.), (ii) *Grant v. Raffensperger*, 1:22-cv-00122 (N.D. Ga.), (iii) *League of Women Voters v. Lee*, No. 4:21-cv-186 (N.D. Fla.), (iv) *Community Success Initiative v. Moore*, No. 19-cv-15941 (N.C. Superior Court) (2020); (v) *Perez v. Perry* (5:11-CV-00360, W.D. Tex.); (vi) *South Carolina v. United States* (1:12-cv-00203, D.D.C.); and (vii) *Veasey v. Perry* (2:13-CV-193, S.D. Tex.). In addition, I testified on the VRA in a Congressional Briefing on December 4, 2015.

C. Methodology and Sources

In this report, I have employed the standard methodology used by historians and other social scientists in investigating the adoption, operations, and maintenance of election laws. When analyzing political decision-making, historians examine the circumstantial and contextual evidence regarding the political, institutional, and social environment and context in which a decision is made, as well as direct evidence of the reasons asserted for the decision. We examine relevant scholarly studies, newspaper coverage of events, reports of local, state or federal governments, relevant court decisions, and the record in court cases, including expert reports, depositions and trial testimony, and statistical data. In writing this report, I have examined a wide range of sources. I have relied on primary and secondary sources available to me at the time of writing this report. This report makes extensive use of primary sources, especially contemporary newspapers, which record debates and speeches, and help to provide a barometer of public sentiment. Where possible, I have consulted historical and current newspaper and news magazines accounts, social media, miscellaneous online resources, from multiple perspectives, and checked for accuracy. I have also read the records of both houses of the Georgia General Assembly, the

journals and debates of the constitutional conventions, bill histories, and public statutes. I have studied census data, election returns, state and federal reports, official elections records. I have also used videos that have been recorded and preserved. I have also consulted secondary published works, as well as MA and Ph.D. theses, on politics and race relations in Georgia by other historians and social scientists, specifically, as well as in the South as a whole. This report features extensive footnotes to allow readers to assess the accuracy and credibility of my evidence and my conclusions.

IV. GEORGIA'S HISTORY OF RACE DISCRIMINATION IN VOTING

A. Introduction

Native Georgia historian, Dr. U. B. Phillips, argued in 1928 that the central theme of southern history was white racism. According to Phillips, white Southerners believed so strongly in white supremacy that they were determined the South “shall be and remain a white man’s country.”⁴ Recently, Georgian and today’s most eminent historian of the American South, Spalding Distinguished Professor of History, emeritus at the University of Georgia, Dr. James C. Cobb, characterized Phillips’s argument as a “longstanding determination of whites to control people of color.” In Cobb’s own 2017 historical investigation of Georgia’s racial history he concluded, “the historical and contemporary pervasiveness of this impulse [of white Georgians determination to control people of color] is difficult to deny.”⁵ My own research has found the same underlying purpose. This report demonstrates that this white determination resonates even today and especially in the area of voting rights. Over generations, people of color in Georgia have been discriminated against, disfranchised, and their vote diluted in ingenious ways by those who control the franchise in state and local governments.

The courts have taken judicial notice of this long and continuing history of racial discrimination, particularly in the area of voting rights. In 1994, in *Brooks v. State Board of Elections*, 848 F. Supp. 1548, 1560 (S.D. Ga. 1994), the court found: “Georgia has a history chocked full of racial discrimination at all levels. This discrimination was ratified into state constitutions, enacted into state statutes, and promulgated in state policy. Racism and race

⁴ Ulrich B. Phillips, “The Central Theme of Southern History,” *American Historical Review*, Volume 34, Issue 1 (Oct. 1928), 31; Orville Vernon Burton, “The South as ‘Other,’ The Southerner as ‘Stranger,’” *The Journal of Southern History*, Volume 79, Issue 1 (February 2013): 7-50.

⁵ Declaration of Dr. James C. Cobb at 8, *NAACP v. Gwinnett County Board of Registrations and Elections*, Civil Action No. 1:16-cv-02852, (N.D. Ga. Aug. 9, 2017).

discrimination were apparent and conspicuous realities, the norm rather than the exception.” This discrimination continues to this day.

In *A Voting Rights Odyssey: Black Enfranchisement in Georgia* (2003), Laughlin McDonald, an expert on Georgia’s voting history, wrote:

“While Georgia was not an anomaly, no state was more systematic and thorough in its efforts to deny or limit voting and officeholding by African-Americans after the Civil War. It adopted virtually every one of the traditional ‘expedients’ to obstruct the exercise of the franchise by blacks, including literacy and understanding tests, the poll tax, felony disfranchisement laws, onerous residency requirements, cumbersome registration procedures, voter challenges and purges, the abolition of elective offices, the use of discriminatory redistricting and apportionment schemes, the expulsion of elected blacks from office, and the adoption of primary elections in which only whites were allowed to vote. And where these technically legal measure failed to work or were thought insufficient, the state was more than willing to resort to fraud and violence in order to smother black political participation and safeguard white supremacy.”⁶

As McDonald further explained, Georgia and other southern states “continued their opposition to equal voting rights into the twentieth century and after the passage of the Voting Rights Act in 1965.”⁷ Since McDonald published this assessment of Georgia’s history of voter discrimination and suppression in 2003, the state of Georgia has continued attempts to minimize the electoral influence of minority voters. Throughout the history of the state of Georgia, voting rights have followed a pattern where after periods of increased nonwhite voter registration and turnout, the state has passed legislation, and often used extralegal means, to disfranchise minority voters. Georgia continues attempts to minimize the electoral influence of minority voters, most recently in the redistricting plan passed by the Georgia General Assembly and signed by the Governor, and culminating in the disfranchisement mechanisms and implementation of SB 202. The first section of this report describes this extensive history from as far back as Reconstruction through the present day.

⁶ Laughlin McDonald, *A Voting Rights Odyssey: Black Enfranchisement in Georgia* (Cambridge: Cambridge University Press, 2003), 2–3. The early history of voter suppression and voter intimidation of Black voters from 1867 till the 1990s in Georgia is carefully documented by Laughlin McDonald, Michael B. Binford, and Ken Johnson in “Georgia,” chapter three of *Quiet Revolution in the South: The Impact of the Voting Rights Act, 1965-1990*, edited by Chandler Davidson and Bernard Grofman (Princeton, N.J.: Princeton University Press, 1994), 67-102.

⁷ McDonald, *A Voting Rights Odyssey*, 3.

B. Reconstruction Era (End of the Civil War to 1870s)

From Georgia's beginning, Black Georgians were precluded from participating in nearly all of Georgia's political and civil life. Near the start of the Civil War, in 1860, the United States census recorded 41,080 owners of 462,000 enslaved persons. Except for Virginia, Georgia had more enslaved persons and more owners of slaves than any state. But free Blacks were denied citizenship and voting rights in antebellum Georgia too; under the 1777 Georgia Constitution, voting was limited to "male white inhabitants, of the age of twenty-one years." Before the start of the Civil War, in March 1861, Alexander H. Stephens, a Georgian and vice-president of the Confederacy, explained that the new government had as its cornerstone, "the great truth than the negro is not equal to the white man."⁸

Immediately following the Civil War was a period of opportunity for the newly freed population. But in opposition to any such new freedom were targeted policies against Black Georgians.⁹ With the defeat of the Confederacy, turmoil and uncertainty roiled the countryside. In June 1865, the 9,000 U.S. Army soldiers provided some measure of order and, where they were stationed, some protection for the newly freed enslaved people. With President Andrew Johnson's appointment of a provisional governor, white adult males who took a loyalty oath to the United States voted for delegates to write a new state constitution. While the new 1865 Georgia Constitution abolished slavery (as it was required to), the 1865 Constitution continued to limit the franchise to "free white male citizens of this State." Georgia's 1865 Constitution also excluded Black Georgians from holding office.¹⁰

At the end of the Civil War, Confederate states seeking to rejoin the Union were required to ratify the 13th Amendment, which specifically outlawed slavery.¹¹ In December 1865, the

⁸ Keith S. Hebert, *Cornerstone of the Confederacy: Alexander Stephens and the Speech that Defined the Lost Cause* (2021); McDonald, *A Voting Rights Odyssey*, 16.

⁹ Jeffrey Robert Young, "Slavery in Antebellum Georgia," *New Georgia Encyclopedia*, www.georgiaencyclopedia.org/articles/history-archaeology/slavery-antebellum-georgia (Oct. 20, 2003) (last edited Sep. 30, 2020); William Harris Bragg, "Reconstruction in Georgia," *New Georgia Encyclopedia*, <https://www.georgiaencyclopedia.org/articles/history-archaeology/reconstruction-in-georgia/> (Oct. 21, 2005) (last edited Sep. 30, 2020)

¹⁰ Numan V. Bartley, *The Creation of Modern Georgia* (Athens: University of Georgia Press, 1983), 46-47; Bragg, "Reconstruction in Georgia."

¹¹ Orville Vernon Burton, *The Age of Lincoln* (New York: Hill and Wang, 2007), 269-70, 275, 298, 368; Orville Vernon Burton and Armand Derfner, *Justice Deferred: Race and the Supreme Court* (Harvard University Press, 2021), 37-38, 41, 44-45;

Georgia General Assembly ratified the 13th Amendment, and President Andrew Johnson returned governing the state to Georgia's elected officials. While the language of the prisoner exemption clause of the 13th Amendment was common to state constitutions and the Northwest Ordinance, historian Eric Foner notes that it "did not go unnoticed among white Southerners" that the 13th Amendment included a prisoner exemption clause.¹² In November 1865, for instance, former Confederate general John T. Morgan pointed out in a speech in Georgia that the 13th Amendment did not prevent states from enacting laws that enabled "'judicial authorities' to consign to bondage blacks convicted of crime."¹³

Georgia, like other states in the former Confederacy, then enacted "Black Codes," although the state did not refer to them with that name. This legislation regulated and restricted the rights of Black citizens through neutral-sounding regulations.¹⁴ Although Black Georgians could not be legally subjected to penalties or punishment that did not apply to whites, it was local white officials and all white juries who decided whom would be punished and whom would not. While Black Georgians were granted some property rights, they could not serve on juries, or vote, or, significantly, testify against whites in court. Thus white Georgia officials were able to apply supposedly race neutral laws in a way that targeted the former enslaved people. Around this time, the Georgia legislature elected two prominent former Confederate officials as Georgia's two U.S. Senators, Alexander Stephens and Herschel Johnson, which the North saw as a flagrant act of white Georgian defiance and led Congress to deny them a seat in Washington.

In reaction to the re-election of former Confederate leaders, to the Black Codes, and to increasing violence against newly freed Black people, Georgia and nine other former Confederate States were placed under Federal military authority in 1867. As part of that oversight, adult Black males were given the right to vote, and the following time period was one of tremendous opportunity for Black Georgians. After the passage of the Second and Third Reconstruction Acts by Congress in 1867, Black males voted for the first time, and federally appointed registrars added 98,507 Black men to the voting lists, and required Georgia, as a requirement for readmission as a

¹² Eric Foner, *The Second Founding: How the Civil War and Reconstruction Remade the Constitution* (New York: W. W. Norton, 2019), 47-48, 110.

¹³ Sidney Andrews, *The South Since the Civil War* (Boston: Houghton Mifflin, 1971), 323-24 (first published by Ticknor and Fields, 1866); John Richard Dennett, *The South as It Is, 1865- 1866*, (Tuscaloosa: University of Alabama Press, 2010), 110.

¹⁴ Bartley, 17; Bragg, "Reconstruction in Georgia."

state, to write Black suffrage into the state constitution, elect a government based on the new Constitution, and ratify the Fourteenth Amendment, which granted citizenship to the formerly enslaved and guaranteed equal protection, and provided that Congress and the federal government could enforce that protection even against the states.¹⁵ In December 1867, a new constitutional convention, held in Atlanta, guaranteed Black citizenship, protection of the laws, and the right of male suffrage. In the next election, in April 1868, held under the new constitution, twenty-five Black Georgians were elected to the State House, and three were elected to the State Senate.

Shortly afterward, white Georgians plotted to eliminate their power. Robert Toombs, a Democratic Party leader from Wilkes County, Georgia, exclaimed at a meeting of Georgia Democrats in July 1868 that it was an injustice that Georgia had been forced to accept “[Republican Governor Rufus] Bullock and nigger Government.”¹⁶ Toombs had served as secretary of state of the Confederacy and as a Confederate general, and he objected to Georgia’s Constitution of 1868, drafted during Reconstruction, because he believed it granted Black people too many rights of citizenship.¹⁷ That same year, *The Atlanta Constitution* also insisted that “the negro [was] incapable of self-government,” and that the “interest of the white race . . . should be held as paramount to all perilous experiments upon an alien race.”¹⁸

Even white Republicans sought to eliminate Black suffrage. Samuel Bard, the editor of the *Atlanta Daily New Era*, a Republican newspaper, reassured his readers that “Reconstruction does not make negro suffrage a permanency,” and promised that “as soon as the State is once more in its place . . . they can amend their Constitution, disfranchise the negroes, and restore suffrage to the disfranchised whites.”¹⁹ By that December, Democrats, though in the minority, convinced a

¹⁵ Bartley, 48.

¹⁶ “Mammoth Democratic Mass Meeting,” *The Atlanta Constitution* (Atlanta, GA), July 24, 1868 (available online at <https://www.Newspapers.com/image/26848994>).

¹⁷ McDonald, *A Voting Rights Odyssey* at 35-36.

¹⁸ *The Atlanta Constitution* (Atlanta, GA), July 30, 1868 (available online at <https://www.Newspapers.com/image/26849014/>).

¹⁹ “Reconstruction and the Southern Whites,” *The Atlanta Daily New Era* (Atlanta, GA), January 4, 1868. For a scholarly overview of these post-Civil War and post-Reconstruction disfranchising measures, see *Quiet Revolution in the South*, 67–70.

sufficient number of white Republicans to agree to expel all Black members of the Georgia legislature. By September 1868, all Black legislators were expelled from the General Assembly.²⁰

This expulsion, along with the continuing high levels of racial violence directed at African Americans, convinced Congress to suspend Georgia's status once again as a state. Black legislators were reseated after the passage of the Congressional Reorganization Act of 1869.²¹ In 1870 the Georgia Legislature returned the expelled Black legislators to their seats and expelled twenty-two members who had served as Confederate officers. That same year it passed the Akerman Law, prohibiting any person from challenging or hindering voters at the polls.²² White Georgians reacted with vengeance; between 1867 and 1872, "at least a quarter of the state's Black legislators were jailed, threatened, bribed, beaten or killed."²³ At the heart of Black voter suppression was both explicit and implicit white violence. As Sidney Andrews, a journalist from Massachusetts, wrote in 1865, "any man holding and openly advocating even moderately radical views on the negro question, stands an excellent chance, in many counties of Georgia and South Carolina, of being found dead some morning."²⁴

In October 1868, the *Atlanta Daily New Era* reported that those "despairing Democracy are resorting to the grossest acts of violence with the view of intimidating the negro away from the polls."²⁵ Historian Edmund Drago noted that starting in the April 1868 election through the 1872 presidential election, Democrats resorted to murder, violence, fraud, and intimidation, and successfully decreased Republican votes. Black politicians were threatened with violence, and some Black legislators were murdered by the Ku Klux Klan.²⁶

²⁰C. Mildred Thompson, *Reconstruction in Georgia: Economic, Social, Political, 1865-1872* (New York: Columbia University Press, 1915) 214; Edmund L. Drago, *Black Politicians and Reconstruction in Georgia: A Splendid Failure* (Baton Rouge: Louisiana State University Press, 1982), 148. There remains today a bronze sculpture on the Georgia Legislature's grounds entitled "Expelled Because of Color" to the 33 Black members of the Georgia Legislature who were expelled at that time.

²¹ Drago, 55.

²² McDonald, *A Voting Rights Odyssey*, 17–25.

²³ McDonald, *A Voting Rights Odyssey*, 35.

²⁴ Sidney Andrews, "The South Since the War," in Brooks D. Simpson, ed., *Reconstruction: Voices From America's First Great Struggle for Racial Equality* (New York: Library of America, 2018), 140

²⁵ *The Atlanta Daily New Era* (Atlanta, GA), October 25, 1868.

²⁶ Drago, 141-159.

One such instance of political violence happened in Camilla, Georgia in the fall of 1868. Just two months after the state assembly expelled its African American members, local officials from Mitchell County and the surrounding area organized a march from Albany to Camilla that would end at a local Republican rally. Several hundred Black Georgians joined the planned march along with several white Republicans, but upon entering town, local whites hiding out in storefronts along the town square gunned them down, murdering at least a dozen and wounding another thirty. The result of such a massacre was that white Democrats took control of southwest Georgia.²⁷

Klan violence against Black legislators was severe. On October 29, 1869, a Black state legislator named Abram Colby from Greene County, Georgia was attacked by a group of sixty-five Klansmen, who dragged him into the woods and beat him for more than three hours before leaving him for dead. The mob explained that they were attacking Colby because he “had influence with the negroes of other counties.”²⁸ Colby later recounted before the Congressional Joint Select Committee to Inquire into the Condition of Affairs in the Late Insurrectionary States that, as he was beaten with “sticks and with straps that had buckles on the ends of them,” his assailants had demanded that he promise to never “vote another damned Radical ticket.”²⁹ Colby testified that the same group of men had also attempted to bribe him to switch parties or resign from the legislature. Colby’s story, while horrific, was not unique—this kind of violence against Black Republicans was common between 1869 and 1872.³⁰ The Ku Klux was active throughout the

²⁷ See Lee W. Formwalt, “Camilla Massacre,” New Georgia Encyclopedia, <https://www.georgiaencyclopedia.org/articles/history-archaeology/camilla-massacre/> (Sep. 5, 2002) (last edited Aug 20, 2020) See also Lee Formwalt, “The Camilla Massacre of 1868: Racial Violence as Political Propaganda,” *The Georgia Historical Quarterly*, Vol. 71, No. 3 (Fall, 1987), 399-426.

²⁸ *Ibid.*

²⁹ United States Congress, Joint Select Committee on the Condition of Affairs in the Late Insurrectionary States, Luke P. Poland, John Scott, and Woodrow Wilson Collection, *Report of the Joint select committee appointed to inquire into the condition of affairs in the late insurrectionary states, so far as regards the execution of laws, and the safety of the lives and property of the citizens of the United States and Testimony taken* (Washington: U.S. Government Printing Office, 1872). Available online from the Library of Congress, <https://lcn.loc.gov/35031867>.

³⁰ *Ibid.*; see also Kidada E. Williams, “The Wounds that Cried Out: Reckoning with African Americans’ Testimonies of Trauma and Suffrage from Night Riding” in *The World the Civil War Made*, Gregory P. Downs and Kate Masur, eds. (Chapel Hill: University of North Carolina Press, 2015) 159-62, 170-72.

state. Charles Kendricks, a politically active African American carpenter, and landowner in Gwinnett County, was appointed as an election manager by the state's Republican governor; he reported that a Klan leader had burst into his home waving a pistol and threatening to hang him. When he wrestled with the intruder and managed to run away, he was shot. The same perpetrator had previously pistol whipped Kendricks and attempted to stab him when he had seen Kendricks approaching the polls to vote.³¹

The example of Georgian Tunis Campbell is illustrative of Georgia's disfranchisement and intimidation tactics. Born in 1812, Tunis Campbell was a prominent African American abolitionist, who arrived in Georgia as an agent of the Freedman's Bureau. In the spring of 1865, he traveled to the Georgia coast and established a freedmen's settlement. When president Andrew Johnson began pardoning ex-Confederates and returning their land, Campbell purchased a large tract of land on St. Catherine's Island, allocated new settlements, and organized what became a self-governing community.³² From there, Campbell moved into politics, becoming the head of the Republican Party in Georgia, a local registrar of voters, a delegate to Georgia's new Constitutional Convention, and eventually a state senator. He consulted with U.S. President Ulysses S. Grant and Senator Charles Sumner in 1871 on the need for voting rights for African Americans. He even headed up his own militia to protect him and his community from attacks from local bands of the Ku Klux Klan.³³ Local whites attempted to undermine Campbell from the start. In 1867, while serving as a state registrar, he survived a poisoning attempt, which reportedly killed one of his colleagues. Two years later, when both Tunis and his son won seats in the Georgia General Assembly, white state officials voted to deny them their seats.

³¹ Testimony Taken by the Joint Select Committee to Inquire into the Condition of Affairs in the Late Insurrectionary States: Georgia, Volume I (Washington, D.C.: Government Printing Office, 1872), 350-55, 515-517. Available online at: https://ia601409.us.archive.org/32/items/reportofjointsel06unit/reportofjointsel06unit_bw.pdf.

³² Russell Duncan, "Tunis Campbell, 1812-1891," New Georgia Encyclopedia, <https://www.georgiaencyclopedia.org/articles/arts-culture/tunis-campbell-1812-1891/> (Dec. 10, 2004) (last modified Jul 15, 2020). See also Russell Duncan, *Freedom's Shore: Tunis Campbell and the Georgia Freedmen* (Athens: University of Georgia Press, 1986).

³³ *Ibid*; See also Richard Hogan, "Resisting Redemption: The Republican Vote in Georgia in 1876," *Social Science History*, Vol. 35, No. 2 (Summer 2011), 13-166. See also, Jess McHugh, "He fought for Black voting rights in Georgia. He was almost killed for it." *The Washington Post* (Oct. 25, 2020) available at: <https://www.washingtonpost.com/history/2020/10/25/voting-rights-tunis-campbell-civil-war/>

During this time of immense violence, intimidation, and chicanery, in 1871 white Democrats took control of the Georgia Legislature. With a majority of elected officials dedicated to white supremacy, the state of Georgia tightened its grip on would-be Black voters and especially on Black elected officials, reinstituting an annual poll tax to dissuade or outright prohibit impoverished Black Georgians from voting. The poll tax and continued violence was effective: In 1872 only four Black citizens were elected to the Georgia Legislature, and only three in 1874.

In 1871, the state of Georgia also voted to remove the Republican Governor, thus basically ending political Reconstruction in Georgia. Then Democrats re-organized county elections and took control of local elections, thereby diminishing both the electoral power of Black voters-- and negating Tunis Campbell's authority as the leading politician in McIntosh County. In 1874, for example, Campbell won a seat in Georgia's House of Representatives, but Georgia's Democratically controlled legislature threw out all of the votes from Darien, Georgia (Campbell's base of support) after learning that a local election judge was not a registered property holder.³⁴

Finally, in 1876, after years of trying to thwart Campbell's political career, white Democrats arrested Campbell on trumped up charges alleging malfeasance in office. A Georgia court sentenced him to a yearlong term in prison, which he served while working as a convict-lease laborer at a state labor camp. He left Georgia upon his release and published a memoir entitled *The Sufferings of the Rev. T. G. Campbell and his Family in Georgia (1877)*.³⁵

The story of Tunis Campbell illustrates the effectiveness of violence, intimidation, fraud, and the poll tax. After white Democrats seized control of the Georgia state legislature, they organized a new constitutional convention, chaired by the same Robert Toombs cited above, who had been the secretary of state of the Confederacy. The Georgia state constitution of 1877 implemented a cumulative poll tax for elections, so that potential voters had to pay all previous unpaid poll taxes before casting a ballot.³⁶ The new 1877 Georgia constitution did not disfranchise its African American citizens in explicit words. But as historian Edmund Drago noted, however,

³⁴ See Hogan, 147.

³⁵ See Duncan, "Tunis Campbell." See also Tunis G. Campbell, *Sufferings of the Rev. T.G. Campbell and his family, in Georgia* (Washington, D.C.: Enterprise Publishing Company, 1877). Available online at: <https://archive.org/details/sufferingsofrevt00camprich/page/9/mode/2up>

³⁶ For a brief explanation of how the cumulative poll tax worked to disfranchise African Americans, see Avidit Acharya et al., *Deep Roots: How Slavery still Shapes Southern Politics* 146 (2018).

new restrictions, combined with reinstated poll taxes, were “sufficient to render black participation in politics improbable.”³⁷

C. The Populist & Early Progressive Movement Era (1880s to 1910s)

Populism emerged in the late 1880s as a challenge to the Post-Reconstruction settlement in Georgia. Populism meant different things to different people in different places, but it usually meant an emphasis on “the people” rather than on “the elite.” In Georgia “the people” meant the white people and the maintenance of white supremacy and the avoidance of any challenges to one-party rule. Almost all Georgia white elites were committed to the maintenance of white supremacy. A leading political figure in Georgia in these years was not a Populist but the Progressive Movement leader Henry Grady, who proclaimed the first of many “New Souths.” Grady wrote in 1885 that racial inequality is “instinctive—deeper than prejudice or pride—and bred in the bone and blood” and therefore it was essential that “the white race must dominate forever in the South.”³⁸

Populism and the Farmer’s Alliance became a major factor in Georgia politics in the late 1880s. Most Georgia Populists were not racial egalitarians, but they did denounce race hatred and lynching, and promoted enlightened and mutual self-interest as an economic strategy. The Populists also called for financial reforms and regulation of corporations, particularly the railroads. The *Atlanta Constitution* warned that maintaining white supremacy was more important than “all the financial reform in the world.”³⁹ In Georgia progressivism was, in the words of historian John Dittmer, “conservative, elitist, and above all, racist.”⁴⁰

The populist career of Tom Watson, a Congressman and U.S. Senator from Georgia, demonstrated the difficulties of challenging white supremacy in the state. Watson was initially a supporter of the interracial alliance of the populist movement, advocating for the rights of African Americans to vote and even standing guard all night to protect an African American’s right to vote. But after 1900, in his Georgia congressional campaign, Watson refashioned himself as virulently

³⁷ McDonald, 35–37; Drago, 156.

³⁸ Bartley, 85–86.

³⁹ McDonald, *A Voting Rights Odyssey*, 37.

⁴⁰ John Dittmer, *Black Georgia in the Progressive Era, 1900–1920* (Urbana: University of Illinois, 1977), 214.

racist (and anti-Semitic), a vehement defender of lynching, running on a platform of white supremacy.⁴¹

Georgia then took additional steps to exclude Black voters from the franchise at the end of the 19th century. In 1890, the Georgia legislature passed a law ceding primary elections to party officials. The law kept political candidates from trying to appeal to Black voters or to build multiracial coalitions.⁴² In 1898, the Georgia Democratic Party adopted the use of a statewide primary, a popular progressive reform to remove politics from “smoke-filled back rooms.” But the adoption in Georgia was not a reform to bring in more democracy. In 1900, following the lead of South Carolina, Georgia became the second state to bar Black voters from participating in the Democratic Party, under the pretense that the Democratic Party was a private “club” and only had to accept the patronage of its chosen “guests.” Because Georgia was a one-party Democratic state, this meant that Black Georgians had no effective role in the state’s politics. The white primary was one of the central ways Georgia evaded the Fifteenth Amendment.⁴³

Georgia’s government took another a giant step towards evading the Fifteenth Amendment in 1908, when it passed the “Progressive era” Felder-Williams bill, which became known as the “Disenfranchising Act.” Because the Fifteenth Amendment barred outright elimination of Black voting, other methods were used to curb and discourage Black voting without explicitly banning it. Even so, many agreed with the Georgia Congressman Tom Watson, who said in 1910 that “the hour has struck for the south to say that the fifteenth amendment is not law and will no longer be respected.”⁴⁴

The 1908 Felder-Williams bill broadly disfranchised many Georgians but included a series of exceptions that would continue to allow most white voters to vote, such as: (1) having served

⁴¹ Julia Mary Walsh, “‘Horny -Handed Sons of Toil’: Workers, Politics, and Religion in Augusta, Georgia, 1880—1910,” (Urbana: University of Illinois, 1999). Available online at: <https://www.ideals.illinois.edu/handle/2142/84756>; Donald A. Grant, *The Way it Was in the South: The Black Experience in Georgia* (1993; University of Georgia Press, 2001), 175-78; C. Vann Woodward, *Tom Watson: Agrarian Rebel* (1938; Oxford University Press, 1963); Barton Shaw, “Populist Party.” New Georgia Encyclopedia, <https://www.georgiaencyclopedia.org/articles/history-archaeology/populist-party/> (Sep. 3, 2002) (last modified Sep. 29, 2020)

⁴² Bartley, 149; GA History, “White Primary Ends,” available online at: <http://gahistorysms.weebly.com/white-primary-ends.html>

⁴³ McDonald, *A Voting Rights Odyssey*, 38.

⁴⁴ *Ibid*, 39–40

in either the U.S. or Confederate armies, (2) having descended from someone who had served in either the U.S. or Confederate armies, (3) owning forty acres of land or five hundred dollars' worth of property in Georgia, (4) being able to write or to understand and explain any paragraph of the U.S. or Georgia Constitution, or (5) being "persons of good character who understand the duties and obligations of citizenship."⁴⁵ Overall, the Felder-Williams bill's literacy test, plus a property requirement and a cumulative poll tax, eliminated almost all existing Black voters in Georgia (along with a fair number of poor whites.)

While the bill became known as the "Disenfranchising Act," Georgia officials like Governor Hoke Smith justified the bill in the name of "honest elections in Georgia," which could begin by "keeping registration lists above suspicion."⁴⁶ Thus, pursuant to this new law, a new registration of voters was held after its adoption by popular vote.⁴⁷ The technique of disfranchisement under the name of something else, such as honest elections, became more prevalent in Georgia and elsewhere. As the *Atlanta Journal* wrote about the Felder-Williams bill, in passing it "Georgia takes her place among the enlightened and progressive states which have announced that the white man is to rule. She has declared in clear and specific terms for Anglo-Saxon supremacy and the integrity of the ballot."⁴⁸

In the campaign to disfranchise Black voters, Georgia officials blamed a specter of voter fraud, echoing rhetoric from the violent overthrow of Reconstruction that Black residents did not deserve the rights of citizenship and the sanctity of the ballot. For Southern Progressives, as Governor Hoke Smith argued, "the first step toward purifying the ballot" was "the exclusion of the ignorant and purchasable negro."⁴⁹ White Democrats blamed "fraudulent negro voters" for Republican rule during Reconstruction, and falsely claimed that denying African Americans the right to vote would eliminate fraud.⁵⁰ John M. Brown, the editor of *The Bainbridge Democrat*, argued that "the negro as a voter—by a very large majority—is purchasable," and without

⁴⁵ *Ibid*, 41.

⁴⁶ Georgia. General Assembly. House of Representatives. *Journal of the House of Representatives of the State of Georgia* (Atlanta, GA: Franklin-Turner Company, 1908), 11. Available online through the University of Georgia at: http://dlg.galileo.usg.edu/do:dlg_ggpd_y-ga-bl404-b1908.

⁴⁷ *Journal of the House of Representatives of the State of Georgia*, 19.

⁴⁸ McDonald, *A Voting Rights Odyssey*, 42.

⁴⁹ "Hoke Smith Writes of Campaign Issues," *The Atlanta Georgian and News* (Atlanta, GA), July 29, 1910.

⁵⁰ *The Atlanta Constitution* (Atlanta GA), June 16, 1898.

disfranchisement a “minority of the whites” could control Black voters and take Georgia hostage.⁵¹ The false claim that Black votes were fraudulent began during Reconstruction and continues as a trope today.⁵²

This pretext of voter fraud and purifying elections was used to justify the wholesale change in voter registration laws. In conjunction with the Felder-Williams bill that stripped Black men of their voter registrations, the Georgia General Assembly also approved a measure to amend the process for registering voters. The *Cartersville News* explained that this “pure election law” provided that “the registration list shall be placed on exhibit in the office of the clerk of the court, where all may inspect and may challenge those who are thought not worthy of a place.”⁵³ The bill stipulated that “the list from the voters’ books . . . shall be open to public inspection, and any citizen of the county shall be allowed to contest the right of registration of any person whose name appears upon the voters’ list.”⁵⁴ This “challenge” provision was incorporated into the 1910 Code of the State of Georgia, and remains substantively unchanged to this day.⁵⁵

The purpose of both the disfranchisement law and the registration law was clear: to disfranchise Black Georgians and keep it that way. Governor Smith explained that during his tenure that “we adopted a registration law” that “was intended to make complete and fully effective the disfranchisement law.”⁵⁶ The *Atlanta Semi-Weekly Journal* wrote that “the registration provision of the pure election law which guarantees the ballot to every real white citizen of the

⁵¹ “For Negro Disfranchisement,” *The Bainbridge Democrat* (Bainbridge, GA), September 3, 1908.

⁵² *The Atlanta Constitution* (Atlanta GA), June 16, 1898.

⁵³ “Laws to Govern Georgia Elections,” *The Cartersville News* (Cartersville, GA), August 20, 1908.

⁵⁴ Part I, Title VII, *Acts and Resolutions of the General Assembly of the State of Georgia, 1908* (Atlanta, GA: Charles P. Byrd, 1908), 60. Available online through the Digital Library of Georgia at: https://dlg.usg.edu/record/dlg_zlgl_102041291

⁵⁵ Originally codified as § 34-605, the 1908 voter challenge provision was preserved in substantially the same form through extensive reorganization and modernization of the Georgia Election code in 1964 and 1981, when it was re-codified at § 21-2-230. As observed in the editor’s note for the 2008 edition of *The Official Code of Georgia, Annotated* § 21-2-230, the voter challenge provision of the reorganized 1981 *Official Code of Georgia* was so similar to the 1933 *Code*’s voter challenge statute that any legal opinions decided under the older code would apply to § 21-2-230. See O.C.G.A. § 21-2-230 (2008). On intimidation and the use of the Georgia Challenge law, see *Vigilante: Georgia’s Vote Suppression Hitman* (Show&Tell Films 2022).

⁵⁶ “Hoke Smith Writes of Campaign Issues,” *The Atlanta Georgian and News* (Atlanta, GA), July 29, 1910

state” ensures that “his ballot’s power shall not be vitiated by a corrupt and floating element,” i.e. the Black voter whose vote was “fraudulent.”⁵⁷

Together, these laws were devastatingly effective at eliminating both Black elected officials from seats of power and Black voters from the franchise. At this time of the Felder-Williams bill, the last remaining African American in the legislature was William H. Rogers, and he resigned after the passage of the bill. There would not be another Black Georgian in the legislature for half a century. In terms of voters, in 1908, 33,816 Black Georgians were registered to vote. Two years later, only 7,847 African Americans were registered, a decrease of more than 75 percent. In comparison, fewer than six percent of white voters were disfranchised by Georgia’s new election laws.⁵⁸ From 1920 to 1930 the combined Black vote total never exceeded 2,700.⁵⁹ In 1940 the total Black registration in Georgia was an estimated 20,000, around two or three percent of eligible Black voters. If anything, this figure exaggerates Black voting strength, since until 1944 Black voters were barred from the only election that mattered, the Democratic Party primary.⁶⁰

D. Early 20th Century (1910s to 1940s)

During the early 20th century, beyond the poll tax and the white primary which had functionally removed nearly all Black Georgians from voter registration lists, Black Georgians also faced an array of state-sponsored discrimination across all aspects of life which led back to voting.⁶¹ One was education. In *Cumming v. Richmond County School Board*, 175 U.S. 528 (1899), the U.S. Supreme Court sanctioned Georgia’s de jure segregation of white from Black students. The case arose after the school board in Augusta, Georgia, closed the only Black public high school in the county, while still operating its white high school. The Georgia Supreme Court

⁵⁷ “A Puerile Attack on a Great Law,” *The Atlanta Semi-Weekly Journal* (Atlanta, GA), June 24, 1910.

⁵⁸ *Ibid.*; see also *Quiet Revolution in the South*, 67.

⁵⁹ McDonald, *A Voting Rights Odyssey*, 46.

⁶⁰ *Ibid.*, 49; see also J. Morgan Kousser, *Colorblind Injustice: Minority Voting Rights and the Undoing of the Second Reconstruction* (Chapel Hill: University of North Carolina, 1999), 201.

⁶¹ The continuing effects of discrimination in Georgia hinder the ability of minority group members to participate effectively in the political process. Disparities in education, income, and health outcomes persist in Georgia, effectively disadvantaging many minority voters. Although another expert is providing census data and other statistics on racial disparities in socio-economic characteristics usually cited in connection with Senate Factor 5, I am providing a historical background here.

approved of the closure and segregation, and so did the U.S. Supreme Court. And without support for schools for Black Georgians, not only could literacy tests be used to keep Black people from voting, but under-resourced education and segregated schools severely stalled economic and social mobility for Georgia's Black residents.⁶²

Like many southern states in the early years of the twentieth century, Georgia, on both a state and local level, instituted a vast array of Jim Crow legislation concerning restaurants, parks, zoos, chain gangs, and even prohibiting whites and African Americans from swearing on the same Bible in Atlanta courtrooms.⁶³ Georgia was also dead last among states in the percentage of Black farmers who owned their own land, at only 12.8%.⁶⁴ Of course, under the Felder-Williams Disenfranchisement Act, ownership of land was one of the exceptions of access to the franchise.

In 1916, Georgia elected Hugh M. Dorsey as governor. By no means a racial liberal, Dorsey did oppose the worst of Jim Crow. In his pamphlet entitled, *A Statement from Governor Hugh M. Dorsey as to the Negro in Georgia*, published before he left office in 1921, he highlighted the condition of Black Georgians at the time. He wrote, "in some counties the Negro is being driven out as though he were a wild beast. In others he is held a slave." Governor Dorsey also wrote, in response to white mob violence against Black Georgians, that Georgia "stand[s] indicted before the world. If the conditions. . . should continue, both God and man would justly condemn Georgia more severely than man and God have condemned Belgium and Leopold for the Congo atrocities."⁶⁵ Governor Dorsey wrote the truth; violence and threat of violence was constant for many Black Georgians after white Democrats controlled the state in the late 19th and first part of the 20th century.

⁶² Edward A. Hatfield, "Segregation," New Georgia Encyclopedia, <http://www.georgiaencyclopedia.org/articles/history-archaeology/segregation> (Jun 1, 2007) (last edited Jul 20, 2020); Grant, 220. The Booker T. Washington High School in Atlanta opened in 1924; there were several denominational high schools for African Americans in Georgia.

⁶³ Bartley, 148.

⁶⁴ Adrienne Petty and Mark Schulz, "American Landowners and the Pursuit of the American Dream," in *Lincoln's Unfinished Work: The New Birth of Freedom from Generation to Generation*, Orville Vernon Burton and Peter Eisenstadt eds. (Baton Rouge: Louisiana State University, 2022), 133–171.

⁶⁵ "A statement from Governor Hugh M. Dorsey as to The Negro in Georgia," (<https://archive.org/details/statementfromgov00georrich>) (also available through the Library of Congress at <https://lcn.loc.gov/21027163>; cited in Cobb, 22-23.

At the time, a common form of state-sanctioned violence was debt peonage and the convict lease system, which some have described as slavery by another name. In theory, the federal Debt Peonage Act of 1867 had outlawed the peonage system—the system of debt slavery—throughout the United States. But even up through the 1920s, the federal government investigated and prosecuted hundreds of employers across the South, including particularly in Georgia, for practicing peonage. But the federal government’s prosecutions rarely succeeded in punishing offending landowners. In the end, peonage was ended by outside social and economic forces. In 1915, the boll weevil was found on Georgia cotton plants and thereafter the insect devastated cotton agriculture. In addition to the boll weevil, the Great Depression and the mechanization of agriculture spelled the end of the cotton plantations of Georgia. Only the decline of the cotton plantations ended the practice of peonage.⁶⁶

Throughout World War I, Black Georgians also faced state-sanctioned racial discrimination. While the Selective Service Act of 1917 required all able-bodied men of a certain age to register for a national draft, regardless of race, it was local draft boards that were responsible for processing men registering for the draft and selecting which registrants would be inducted into military service.⁶⁷ In Fulton County, for example, the draft board “granted exemptions to 526 of the first 815 white registrants examined but turned down only six out of 202 black men.”⁶⁸ Statistically, across Fulton County, 65 percent of the whites but only three percent of the Black Georgians were granted exemptions from military service. Fulton County’s racially discriminatory decisions were so flagrant that President Woodrow Wilson, who had lived in Augusta, Georgia as

⁶⁶ Miller Handley Karnes, “Law, Labor, and Land in the Postbellum Cotton South: The Peonage Cases in Oglethorpe County, Georgia, 1865-1940,” (Urbana: University of Illinois, 2000), available online at: <https://www.ideals.illinois.edu/handle/2142/84756>; Cobb, 19-22; Pete Daniel, *The Shadow of Slavery: Peonage in the South, 1901-1969* (New York: Oxford University Press, 1972), 110-131; Talitha L. Laflouria, *Chained in Silence: Black Women and Convict Labor in the New South* (Chapel Hill: UNC Press, 2016); Sarah Haley, *No Mercy Here: Gender, Punishment, and the Making of Jim Crow Modernity* (Chapel Hill: UNC Press, 2016).

⁶⁷ U.S. Congress, “An Act To authorize the President to increase temporarily the Military Establishment of the United States,” United States Statutes at Large, Vol. 40 (1917-1919), 65th Congress (available online through the Law Library of Congress at <https://www.loc.gov/law/help/statutes-at-large/65th-congress/session-1/c65sch.pdf?loclr=blogloc-ww1>).

⁶⁸ Arthur E Barbeau and Florette Henri, *The Unknown Soldiers: Black American Troops in World War I* (Philadelphia: Temple University Press, 1974), 35.

a boy, and who is today remembered as the president who segregated the federal government and endorsed the racist movie, “Birth of a Nation,” was forced to remove officials of the Fulton County Georgia Draft Board.

As Black Georgians were drafted into the war at a higher proportion than were whites, the NAACP established a chapter in Georgia in 1917, which was the same year that Georgia adopted the county unit form of government. The county-unit system became the method for determining the winner of the Democratic primary, the only elections in the state that mattered.⁶⁹

Under the county-unit system, every county was given twice the number of unit votes as they had representatives in the state house. Each of Georgia’s 159 counties had at least one seat in the legislature, no county had more than three. The winner in each county’s primary election received all that county’s unit votes. This system gave a greater share of proportion of votes to small, rural, and much whiter counties, compared to larger and more urban counties, where the majority of still active Black voters lived.⁷⁰ As in many states prior to the *Baker v. Carr* (1962) decision, Georgia’s election system had a strongly rural bias, but perhaps in no state was the rural tilt as pronounced as in Georgia, diluting the strength of Black voters across Georgia.

Against this backdrop, in 1919, the Atlanta chapter of the NAACP was wildly successful in its voter registration drive: in one month, they registered more than one thousand new Black voters, more than doubling the number of Black voters who participated in past elections. The success of the NAACP caused panic among leading whites, and the following year, the Georgia General Assembly proposed legislation to prohibit Blacks from voting or from holding office.⁷¹

As Black Georgians returned from the war, many white Georgians held a deep antipathy regarding Black WWI veterans, which led in part to the rise of the Ku Klux Klan in Georgia following the war. Historian Nancy MacLean wrote about this time, in which seeing Black men in military uniforms, “a symbol commanding respect,” led white Georgians to racial violence as backlash.

⁶⁹ Between 1872 and 1950, the Democratic candidate won every state-wide race. See McDonald, *A Voting Rights Odyssey* at 81.

⁷⁰ Scott E. Buchanan, “County Unit System,” *New Georgia Encyclopedia*, <http://www.georgiaencyclopedia.org/articles/counties-cities-neighborhoods/county-unit-system> (Apr 15, 2005) (last edited Aug 21, 2020).

⁷¹ Nancy MacLean, *Behind the Mask of Chivalry: The Making of the Second Ku Klux Klan* (Athens: University of Georgia, 1994), 28.

After World War I, in Georgia and elsewhere, African Americans again continued to try to vote despite the *legal* means of disfranchisement which state officials (white Democrats) had enacted, and whites again resorted to violence and intimidation to keep African Americans from the polls. For example, in Harris County, Georgia, African Americans planned to vote because President Franklin Roosevelt had a vacation home nearby, giving Black voters there a sense of federal protection. Trying to eliminate that sense of protection, however, white Georgians in the area “dug some graves there by the courthouse... and burned some crosses at the crossroads.”⁷²

Of course, lynchings throughout the state served as a reminder for Black Georgians who challenged the status quo, and in practice lynchings did not need to be directly connected to the right to vote to act as a threat against all Black Georgians who dared participate in the franchise. From 1875 to 1930, there were 462 lynchings in Georgia. Only the state of Mississippi had more reported lynchings. Graphic descriptions of the lynchings sent messages to Black Georgians to stay in line (and to whites that racial violence would go unprosecuted).⁷³

E. World War II Era (1940s to 1950s)

Up until the 1940s, Black Georgians had been successfully excluded from the franchise by many means, including the white primary. In 1944, however, in *Smith v. Allwright* the United States Supreme Court issued a landmark decision holding that political parties could not exclude Black Americans from participating in the party’s primary elections, thereby prohibiting the widely utilized white primary system.⁷⁴

One year later, in 1945, the United States District Court for the Middle District of Georgia ruled in *King v. Chapman* that the Muscogee County Democratic Executive Committee and the state of Georgia had violated the Fourteenth, Fifteenth, and Seventeenth Amendment rights of Primus E. King, a Black voter who had been turned away when he had attempted to vote in the Democratic Party’s primary in Columbus, Georgia that prior summer. The judge, in part relying

⁷²Testimony of William Simpson, Trial Transcript at 115, 118, *Brown v. Reames*, Civ. No. 75-80-COL (M. D. Ga.)

⁷³ W. Fitzhugh Brundage, *Lynching in the New South: Georgia and Virginia, 1880-1930* (Urbana-Champaign: University of Illinois Press, 1993); McDonald, 47; Georgia Lynching Project, circa 1875-1930,” (<https://scholarblogs.emory.edu/galynchings/counties/>).

⁷⁴ *Smith v. Allwright*, 321 U.S. 649 (1944).

on *Smith v. Allwright*, found that despite Georgia's attempts to make party primaries "purely private affairs," primary elections were "by a law an integral part of the election machinery."⁷⁵

These cases, along with Governor Ellis Arnall's decision not to attempt to "circumvent the [*Allwright*] decision," and organizing efforts by groups like the NAACP-backed All Citizens Registration Committee, led to a massive surge in voter registration in 1946, especially among Black voters.⁷⁶ By the time of the 1946 primary, 118,387 Black Georgians had registered to vote. According to the *Jackson Progress-Argus* of Jackson, Georgia, this was "by all odds the largest registration in Georgia's primary."⁷⁷

This important progression in Black voter registration, however, was met by outright hostility from candidates in the 1946 Gubernatorial election. For example, the race-baiting Democratic gubernatorial candidate in that election, Eugene Talmadge, campaigned on a platform of white supremacy and disfranchisement, threatening that if the "Democratic White Primary is not restored and preserved," Black voters, "directed by influences outside of Georgia," would control the Democratic Party.⁷⁸ This language echoed earlier comments from Georgia Governor Hoke-Smith which questioned the legitimacy of Black voters.⁷⁹ As Talmadge menacingly warned, "wise Negroes will stay away from white folks ballot boxes." Similarly, Marvin Griffin, a candidate for Lieutenant Governor, made white supremacy a cornerstone of his campaign and announced that he believed "the White Democratic Party should be kept white in Georgia, and that

⁷⁵ *King v. Chapman*, 62 F. Supp. 639 (M.D. Ga. 1945); *Chapman v. King*, 154 F.2d 460 (5th Cir. 1946); *Chapman v. King*, 327 U.S. 800 (1946); "Judge Rules Negroes May Vote," *The Atlanta Constitution* (Atlanta, GA), October 13, 1945; "Georgia Reform Faces Test in Hot Primary," *The Sunday News* (Lancaster, PA), July 14, 1946; Ronald H. Bayor, *Race and the Shaping of Twentieth-Century Atlanta* (Chapel Hill, NC: University of North Carolina Press, 1996), 34.

⁷⁶ McDonald, *A Voting Rights Odyssey*, 49.

⁷⁷ "Total Registration in Georgia May Reach Million When Deadline Falls," *The Jackson Progress-Argus* (Jackson, GA), June 20, 1946; "118, 387 Qualified to Vote in Georgia Primary Election," *The Plaindealer* (Kansas City, KS), July 19, 1946.

⁷⁸ "Georgia CAN Restore the Democratic White Primary and Retain County Unit System," *The Forsyth County News* (Cummings, GA), July 4, 1946.

⁷⁹ "Our Last Chance for WHITE SUPREMACY," *The Jackson Herald* (Jefferson, GA), July 11, 1946; "Georgia's State Campaign To Be Red Hot Affair," *The Gaffney Ledger* (Gaffney, SC), April 25, 1946.

carpet baggers and scalawags should not be permitted to take over this state and destroy southern racial traditions.”⁸⁰

As the 1946 gubernatorial race progressed, both Griffin’s and Talmadge’s campaigns relied on voter challenges to disfranchise Black voters and repudiate the recent court rulings.⁸¹ In particular, Talmadge responded to *Smith v. Allwright* by mounting challenges to Black voter registration forms, claiming they were filled out incorrectly. Although the state law required specific reasons for voiding registrations, Talmadge’s crew cited spurious reasons. They created pre-filled forms with spaces to fill in the voter’s name and county, with reasons such as “the voter was not a resident, was not eighteen, was not a person of good character, could not read the English language,” and so forth.⁸² These forms demonstrated that Talmadge’s campaign did not know the specific circumstances or qualifications of the voters they challenged; all they knew were that these voters “were black, and that was enough.”⁸³ Ultimately, the Talmadge machine challenged so many voters that when those voters arrived in person to prove their qualifications, “it proved impossible to process all of them on election day, and as a result the Black voters were allowed to cast their ballots.”⁸⁴ All in all, during this election, more than thirty counties challenged Black registrations, denying an estimated 15,000 to 25,000 Black registrants the right to vote.⁸⁵

The state of Georgia also continued to attempt to circumvent the rule against white primaries. In 1947, the Georgia General Assembly introduced a bill that would allow the continuation of a white-only primary by divorcing primaries from state action entirely. Willis Smith, a representative from Carroll County, said “Georgia is in trouble with the Negroes unless this bill is passed.” Echoing historian U. B. Phillips’ Central theme of Southern history, Smith continued “This is white man’s country, and we must keep it that way.”⁸⁶

⁸⁰ *The Houston Home Journal* (Perry, GA), May 30, 1946; Kathy Lohr, “FBI Re-Examines 1946 Lynching Case,” July 25, 2006 (available online at: <http://www.npr.org/templates/story/story.php?storyId=5579862>); Cobb Declaration, 26.

⁸¹ “Talmadge ‘Purge’ of Negro Voters Bogging Down in Georgia Counties,” *The Atlanta Constitution* (Atlanta, GA), July 12, 1946.

⁸² McDonald, *A Voting Rights Odyssey*, 52-53.

⁸³ *Ibid.*, 52–54.

⁸⁴ *Ibid.*, 53.

⁸⁵ *Ibid.*, 52–54.

⁸⁶ *Ibid.*, 55. The bill was vetoed by Gov. Thompson who questioned its legality and believed it would invite fraud.

But perhaps the most successful way Georgia continued to circumvent the rule against white primaries was the continuation of the county-unit system, which had both the purpose and the effect of containing the Black vote in the urban areas of the state. By the early 1940s, 43.5% of the state's population (and 39.9% of the state's white population) controlled 59% of the unit votes. The unit vote system was inherently non-majoritarian, and situations in which candidates won the popular vote but lost the unit vote were not uncommon. And it had the consequence that not only legislative districts, but state-wide races for governor and other executive branch positions had a rural and white bias. The main target of the county-unit system was Atlanta and Fulton County, where many Black Georgians lived. In 1946, each unit vote in Fulton County represented 14,092 popular votes, while each unit vote in Chattahooche County (a much whiter county) represented 132 popular votes. In other words, each voter in Chattahooche County had 120 times the weight of a Fulton County voter.

The county-unit system was a bulwark for the racist and die-hard white supremacist machine of long-time governor Eugene Talmadge. Talmadge claimed the enemies of the county unit system were a group of "liberals, white primary antagonists, and integrationists." While five constitutional challenges were brought against the county-unit system in the 1940s and 1950s, none succeeded.⁸⁷

Following Governor Talmadge's death, voter challenges to Black voters were used again during the 1948 Georgia gubernatorial special election. In Laurens County, Georgia, nearly three-quarters of the 2,477 of the Black Georgians who were registered to vote were purged after they were unable to appear before the board of registrars, which a grand jury later found illegal.⁸⁸ Marion County also engaged in a similar, and unsuccessful purge that targeted Black voters, who were challenged because of their supposed "lack of education."⁸⁹ While the efforts to purge Black voters in Laurens and Marion Counties failed, other counties pushed forward. The day before the Democratic primary election, 558 Black voters were purged from Spalding County's registration

⁸⁷ Ibid., 83.

⁸⁸ "Tax Collector of Laurens County Puts Negroes Back on List," *The Butler Herald* (Butler, GA), June 17, 1948; "'Vote Purge' Evidence Said Insufficient," *The Atlanta Constitution* (Atlanta, GA), August 29, 1948; "Twiggs Board Directed to Enroll Negroes," *The Atlanta Constitution* (Atlanta, GA), August 14, 1948.

⁸⁹ "Marion County Striking 400 From Voting List," *The Butler Herald* (Butler, GA), August 26, 1948; "Attempts to Intimidate Voters Told," *The Alabama Tribune* (Montgomery, AL), September 17, 1948;

list. Attempts to challenge and purge Black voters from voter registration lists also occurred in Lowndes, Schley, and Twiggs counties, and may have also taken place in Dougherty County as well.

When attempts to challenge African American voters' qualifications failed, other methods of voter intimidation were employed. For example, Augusta employed "slowdown" tactics in the 1948 elections that mirrored what Savannah did in 1946, whereby "several thousand blacks were unable to vote before the polls closed because of the delaying tactics of poll officials and were simply turned away."⁹⁰ Election officials only allowed three Black voters to vote per hour, in the hopes that there would "be plenty of Negroes standing in line when the polls close."⁹¹ Furthermore, in 1949 the state government (unsuccessfully) attempted to force a general re-registration, "with the obvious aim of ridding the rolls of Negro voters."⁹²

Along with strategic election-related tactics, there was also an upsurge of Klan activity and violence directed at Black voters.⁹³ In the days before the 1948 Democratic primary election, the Ku Klux Klan successfully suppressed Black voting in Lowndes County by burning crosses and threatening African American voters.⁹⁴ Acting Governor M.E. Thompson alleged that "during 1948 intimidation of voters by the Ku Klux Klan is being employed as a substitute for the purge campaign of 1946."⁹⁵ Threats of the Ku Klux Klan, extralegal violence, and all white juries within the legal system made these tactics effective. For example, a Black minister and teacher in Bleckley County went to the courthouse to register to vote in the 1955 election, but the chief of

⁹⁰ "'Vote Purge' Evidence Said Insufficient," *The Atlanta Constitution* (Atlanta, GA), August 29, 1948; "Twiggs Board Directed to Enroll Negroes," *The Atlanta Constitution* (Atlanta, GA), August 14, 1948. "Attempts to Intimidate Voters Told," *The Alabama Tribune* (Montgomery, AL), September 17, 1948; "Pre-Vote Klan Threats Substitute for Poll Purge of '46 – Thompson," *The Atlanta Constitution* (Atlanta, GA), March 25, 1948.

⁹¹ "Attempts to Intimidate Voters Told," *The Alabama Tribune* (Montgomery, AL), September 17, 1948; "Pre-Vote Klan Threats Substitute for Poll Purge of '46 – Thompson," *The Atlanta Constitution* (Atlanta, GA), March 25, 1948.

⁹² William M. Bates, "Require High School For Voters, Cook Asks," *The Atlanta Constitution* (Atlanta, GA), November 20, 1957.

⁹³ McDonald, *A Voting Rights Odyssey*, 52–54.

⁹⁴ Patrick Novotny, *This Georgia Rising: Education, Civil Rights, and the Politics of Change in Georgia in the 1940s* (Macon: Mercer University Press, 2008), 270; "Attempts to Intimidate Voters Told"; "Pre-Vote Klan Threats Substitute for Poll Purge of '46 – Thompson."

⁹⁵ *Id.*

police told him “[n]o niggers register in this courthouse.” The next year, someone burned a cross in his yard. He did not attempt to register again until 1964.⁹⁶

After the passage of the 1957 Civil Rights Act, Georgia Governor Marvin Griffin—the candidate whose campaign had filed thousands of challenges against Black voters in 1946—formed a state election law revision committee, which introduced new voter requirements that were “aimed primarily . . . at curbing potential Negro voting strength in Georgia.”⁹⁷ Voters could be disqualified for offenses like “moonshine liquor law violations, adultery and child abandonment,” and the law would also impose a new, more stringent voter qualification test.⁹⁸ Rather than forcing a re-registration to ensure that all 1.2 million registered voters in the state could meet the new requirements, the new requirements “could be invoked against a registered voter upon challenge by another voter.”⁹⁹ Griffin’s insistence that the legislation include a \$1.00 poll tax (which had been previously eliminated in Georgia in 1945) and bi-annual re-registration ultimately led to the bill’s demise in the General Assembly.¹⁰⁰ From poll tax to registration schemes, the purpose in tweaking voting requirements was difficult to miss; the intent was to keep the numbers of eligible Black voters as low as possible, and to keep the requirements for voting accessible to the more marginal white voters.

F. Pre-Voting Rights Act (Early 1960s)

By the end of the 1950s and the start of the 1960s, Georgia’s malapportioned districts, which had the obvious effect of favoring rural white voters over urban Black voters, continued to grow. In 1960, even though the eight counties with the largest population had 41 percent of the

⁹⁶ Even with the VRA, Bleckley County did not see significant increase in Black registration because of the legacy of terror associated with attempting to register at the courthouse. In 1984, Bleckley County allowed satellite registration, and Black registration did increase. See McDonald, *A Voting Rights Odyssey*, 56.

⁹⁷ William M. Bates, “Crime Barriers and Stiffer Tests Proposed to Curb Negro Voting,” *The Atlanta Constitution* (Atlanta, GA), November 22, 1957; “Griffins Poll Tax, Voter Registration Bids Face Scuttling Move in House,” *The Atlanta Constitution* (Atlanta, GA), February 13, 1958.

⁹⁸ Bates, “Crime Barriers and Stiffer Tests Proposed to Curb Negro Voting”; Bates, “Griffins Poll Tax, Voter Registration Bids Face Scuttling Move in House.”

⁹⁹ Bates, “Crime Barriers and Stiffer Tests Proposed to Curb Negro Voting.”

¹⁰⁰ Bates, “Griffins Poll Tax, Voter Registration Bids Face Scuttling Move in House.”

state's population, they had only 12 percent of the members in the Georgia House of Representatives.¹⁰¹

Georgia's congressional districts were also grossly malapportioned around this time. In 1957, Georgia's Fifth District, consisting of Fulton, DeKalb, and Rockdale Counties, was the second most populous congressional district in the United States, with an estimated population of 782,800—about twice the size of the average congressional district. At the same time, Georgia's Ninth District, a much whiter district in the northeast part of the state, had an estimated population of 238,790, less than a third of the population of the fifth District. By 1960, Fulton County was the most underrepresented county in its state legislature of any county in the United States. DeKalb County was in third place.¹⁰² Over time, the explosive growth of Atlanta, and the consequent increase in Black voters, put increased pressure on the county-unit system. Although still badly disproportionate in comparison to registration for whites, growing Black voting strength in Georgia was increasingly able to make a difference in close elections, something the state's segregationists were acutely aware of.

Defending the county-unit system became an issue on which die-hard segregationists would take their stand. For Peter Zack Greer, elected lieutenant-governor of Georgia in 1962, “left-wing radicals and Pinks,” were intent on unleashing the “bloc Negro vote in Atlanta.”¹⁰³ Even more moderate segregationists expressed similar sentiments. Carl Sanders, elected Georgia's governor in 1962, stated that eliminating the county-unit system would leave state government in the hands of “pressure groups or bloc votes”—the leading white Georgia euphemism for Black voters—and would keep “liberals and radicals from taking over.”¹⁰⁴

Attempting to prevent the overturning of the county-unit system, in 1962 the Georgia General Assembly made some modifications to increase the representation of Fulton County in the state senate from three to seven. At the same time, however, they allowed the creation of multi-member, at-large districts so that the Black voters in a given county would always be outvoted,

¹⁰¹ McDonald, *A Voting Rights Odyssey*, 80–84; Key, 117–124; Kousser, *Southern Politics in State and Nation*, 203–204.

¹⁰² “What About Justice For the Fifth District?,” *Atlanta Constitution*, 23 October 1952; Bruce Galphin, “Only State Legislature Can Effectuate Reapportionment,” 28 November 1957; “We Challenge Congressman Jim Davis to Follow Seventh District's Example,” *Atlanta Constitution*, 30 March, 1962

¹⁰³ McDonald, *A Voting Rights Odyssey*, 82.

¹⁰⁴ *Ibid.*, 82–83.

and Fulton County’s state senators would be elected on an at-large basis. After this system was ruled unlawful, there were two majority-minority districts in Fulton County, one of which elected Leroy Johnson, the first African American to serve in a southern state legislature in many decades.¹⁰⁵

Beginning in 1963, the United States Supreme Court fully outlawed Georgia’s county-unit system in *Gray v. Sanders*, 372 U.S. 368 (1963), culminating in *Wesberry v. Sanders*, 374 U.S. 802 (1963), another case arising from Georgia in which the United States Supreme Court mandated equal apportionment for the upper houses of state legislatures and for congressional districts. As one Georgia scholar wrote, “[these cases were] not a racial discrimination case[s], but its concept that voting districts must be composed of substantially equal populations was to prove one of the keys that opened the door to minority officeholding in Georgia.”¹⁰⁶

In an attempt to subvert the Court’s decisions and to curb Black voting strength and electoral victories, in 1963, the all-white Election Laws Study Committee (ELSC) of the Georgia General Assembly proposed new voting rules for the state of Georgia. The goal of the Committee was to “replace[] the invalid county unit law” with rules that could operate to the same effect.¹⁰⁷ These rules included, most notably, a majority-vote rule to elect any candidate to local, state, and federal office in both primary and general elections, thus requiring a runoff if any candidate received only a plurality of the vote. The bill’s sponsor, Representative Denmark Groover (a self-described “segregationist”), explained such a requirement would reduce the influence of the “Negro bloc vote.”¹⁰⁸ And indeed, in practice, a majority-vote rule ensures that a Black candidate cannot be elected where Black voters are a minority of the population and voting is racially polarized, even when the white vote is split. *See, e.g., City of Port Arthur v. United States*, 459 U.S. 159, 167 (1982) (requiring removal of a majority vote rule for preclearance under Section 5, recognizing that “[i]n the context of racial bloc voting prevalent in [a city in which African Americans constituted a minority of the population], the [majority-vote] rule would permanently foreclose a black candidate from being elected”). Groover’s majority-vote law was ultimately

¹⁰⁵ *Ibid.*, 86-89.

¹⁰⁶ *Ibid.*, 80, 89-90.

¹⁰⁷ McDonald, *A Voting Rights Odyssey*, 91.

¹⁰⁸ Kousser, *Colorblind Injustice*, 198; McDonald, *A Voting Rights Odyssey*, 92.

enacted by the Georgia General Assembly in 1964, and to this day Georgia requires a majority vote for office.¹⁰⁹

In addition to this majority vote requirement, in 1964 the Georgia legislature passed a new voting law with a literacy requirement, a strengthened voter understanding test, a prohibition on voter assistance except in cases of physical disability, a numbered-post provision (a specific method of at-large voting), and an anti-facsimile ballot provision, prohibiting voters from taking sample ballots or lists of candidates into the voting booth, to prevent, or as one of the leaders in the Senate said, “bloc voting” by Black Georgians.¹¹⁰

That same year Georgia’s election laws underwent a substantial revision as the General Assembly passed “a simplified and comprehensive code of election laws” in response to criticism that the state’s election law was disorganized and disjointed.¹¹¹ The reorganization of Georgia’s election laws introduced some important changes, such as the creation of the State Election Board and the standardization of calendars for county and state primaries. But Georgia maintained many other discriminatory laws in the 1964 revisions. For example, the state kept its voter challenge provision. The new election law code stipulated that “any elector of the county shall be allowed to challenge the right of registration of any person whose name appears on the electors list,” and outlined the process for contesting another citizen’s right to vote.¹¹² This voter challenge statute would end up surviving the modernization, recodification, and reorganization of the Georgia Code of Laws in 1981 and a subsequent update to provide for Georgia’s participation in the national “motor voter” program in 1994.¹¹³ In fact, as the editor’s note for the 2008 edition of *The Official Code of Georgia, Annotated* § 21-2-230 observed, the voter challenge provision of the reorganized

¹⁰⁹ See Ga. Code Ann. § 21-2-501.

¹¹⁰ McDonald, *A Voting Rights Odyssey*, 91–103; Kousser, *Colorblind Injustice*, 105, 232–236.

¹¹¹ As Assistant Attorney General Paul Rodgers, a member of the Election Laws Study Committee, argued, “it’s the biggest mess you’ve ever seen.” “New Election Code an Attempt to Simplify ‘Hodgepodge’ Laws,” *The Atlanta Constitution* (Atlanta, GA), May 4, 1964. Lieutenant Governor Peter Zack Geer complained that the state’s election laws were “strewn helter-skelter through the Code of Georgia,” and expressed his belief that the new code would be “surrounded with and imbedded in due process of law and judicial standards.” “Lieutenant Governor Geer Favors New Election Law Code,” *The Forsyth County News* (Cumming, GA), May 27, 1964.

¹¹² *Journal of the Senate of the State of Georgia at the Extraordinary Session*, 1964 (Hapeville, GA: Longino and Porter, Inc., 1964), 83.

¹¹³ “Revising Outdated State Laws a Painstaking Job,” *The Atlanta Constitution* (Atlanta, GA), July 12, 1981; “Legislators Give Update of ’94 General Assembly Session,” *Forsyth County News* (Cumming, GA), April 6, 1994;

1981 *Official Code of Georgia* is so similar to the 1933 *Code*'s voter challenge statute that any legal opinions decided under the older code would also apply to § 21-2-230.¹¹⁴

G. Voting Rights Act Era (1960s and 1970s)

On the eve of the enactment of the Voting Rights Act (VRA) in 1965, most Black Georgians' voting power had been made ineffective by voting rules which were neutral in their language, but functionally discriminatory in effect. By the time of the VRA, while Black Georgians were 34 percent of the voting age population, there were only three elected Black officials, and those officials had been elected in just the previous three years before the enactment of the Voting Rights Act. Overall, less than a third of the eligible Black population was registered in the state, and in Georgia's twenty-three counties with a Black voting age majority, only 16 percent of African Americans were registered compared to 89 percent of whites.¹¹⁵ "This exclusion from the normal political process was not fortuitous; it was the result of two centuries of deliberate and systematic discrimination by the state against its minority population."¹¹⁶

The Voting Rights Act of 1965 would ultimately change the trajectory of voting rights for Black Georgians. In the award-winning book, *Quiet Revolution in the South: The Impact of the Voting Rights Act, 1965–1990*, Laughlin McDonald, Michael B. Binford, and Ken Johnson documented carefully the impact and opening of the franchise to African Americans in Georgia from 1965 through 1990.¹¹⁷ Beyond statistical improvements in Black registration and elected officials, the VRA affected the tone of the political system itself. In 1974, Andrew Young, a civil rights activist with SCLC who would later be elected mayor of Atlanta in 1982, addressed the Association of Southern Black Mayors: "It used to be that Southern politics was just 'nigger' politics: who could 'outnigger' the other. Then you registered 10 to 15 percent in the community and folk would start saying 'Nigra.'" After registration numbers went to 35 to 40 percent, "it's amazing how quick they learned how to say 'Nee-grow.'" And when registration increased to 70

¹¹⁴ O.C.G.A § 21-2-230 (2008)

¹¹⁵ U.S. Commission on Civil Rights, *Political Participation: A Study of the Participation by Negroes in the Electoral and Political Processes in Ten Southern States since the Passage of the Voting Rights Act of 1965* (Washington, D.C.: U.S. Government Printing Office, 1968), 216-17, 232-39.

¹¹⁶ McDonald, et. al., "Georgia," in *Quiet Revolution in the South*, 67-102, 409-413, quotation on p. 67.

¹¹⁷ *Id.*

percent of the Black votes registered in the South, “everybody’s proud to be associated with their black brothers and sisters.”¹¹⁸

But the 1965 VRA did not translate to instant success in Black voter registration numbers. Even eleven years after the VRA, Black voters in Georgia were systematically underrepresented as a percentage of registered voters even after the passage of the VRA.¹¹⁹ As the table below demonstrates, Black registration trailed white registration significantly even in 1976, particularly in the state of Georgia.¹²⁰

State	% whites registered to vote, 1976	% Blacks registered to vote, 1976	% Difference
Alabama	75.4	58.1	17.3
Georgia	73.2	56.3	16.9
Louisiana	78.8	63.9	14.9
Mississippi	77.7	67.4	10.3
South Carolina	64.1	60.6	3.5
Texas	69.4	64.0	5.5
Virginia	67.0	60.7	6.3

The historical record also shows that most Georgia officials continued their hostility to Black voters and the VRA itself, especially the § 5 preclearance provisions to which they were now subject. As the VRA and other civil rights legislation gathered strength after the mid-1960s, white Georgia officials went to greater lengths to invent conditions and pretexts for challenging and neutralizing Black voting strength, both in the substance in their changes, and by refusing to seek preclearance at all.¹²¹

¹¹⁸ Jack Bass and Walter DeVries, *The Transformation of Southern Politics: Social Change and Political Consequence since 1945* (Basic Books, 1976), 47; David S. Broder, *Changing of the Guard: Power and Leadership in America* (Simon and Schuster, 1980), 367.

¹¹⁹ Campbell Gibson and Kay Jung, *Historical Census Statistics on Population Totals by Race* (Washington, DC: US Bureau of Census, 2002); McDonald, et al., “Georgia,” in *Quiet Revolution in the South*, 102.

¹²⁰ Laughlin McDonald, *Voting Rights in the South: Ten Years of Challenging Continuing Discrimination Against Minorities* (Atlanta: ACLU, Southern Regional Office, 1982).

¹²¹ For examples of white Georgians hostility to the Voting Rights Act and to African American attempts at voting, see especially the testimonies of Julian Bond and Laughlin McDonald in

One of the most common tactics of preventing Black voters from electing candidates of choice was the change from voting by district to at-large voting. The effect of at-large voting, particularly in a jurisdiction with less than a majority of Black voters, is to ensure the white population can elect all the representatives to that district. In 1964, before the VRA, Calhoun County (63% Black), Clay (61% Black), Dooly (50% Black), Early (45% Black), Morgan (45% Black), Newton (31% Black), and Miller (28% Black) had district elections for county government. But after the VRA, all adopted at-large voting, directly violating § 5 preclearance rules. Between 1976 and 1980, all of these counties were sued, and now have district voting for county elections.¹²²

In 1964, as previously discussed, in response to growing African American electoral strength, the Georgia General Assembly had adopted a law that required many offices to be won by a majority vote and not a mere plurality. At the time, the majority of Georgia's 159 counties had operated under a plurality system. The majority vote system was adopted to prevent a Black candidate being "first past the post" against a divided white vote.¹²³ Local jurisdictions also made the change to majority voting after the VRA. The city of Moultrie, Georgia, for example, adopted a majority voting procedure for city offices in 1965. All Black candidates were defeated until a § 5 suit forced the city to adopt districts in 1977. The city of Americus adopted a majority vote in 1968. Until a successful § 5 suit in 1977, two Black candidates who won by plurality in their Americus election races were defeated in the run-off election with a majority requirement. Around this time, Covington and St. Mary's, both cities with substantial Black populations, adopted a majority vote without seeking preclearance for doing so.¹²⁴ Overall, between 1975 and 1982, the U.S. Attorney-General brought 66 suits against majority voting requirements, many of them in Georgia. Many of these Georgia-specific instances can be found in Appendix A, located at the end of this report.

Extension of the Voting Rights Act: hearings before the Subcommittee on Civil and Constitutional Rights of the Committee on the Judiciary, House of Representatives, Ninety-seventh Congress, first session, May 6, 7, 13, 19, 20, 27, 28, June 3, 5, 10, 12, 16, 17, 18, 23, 24, 25, and July 13, 1981. (on Bond see pp. 224ff)(McDonald, 596 ff)

¹²² McDonald, *Voting Rights in the South*, 40–43

¹²³ McDonald, *A Voting Rights Odyssey*, 92–102; Kousser, *Colorblind Injustice*, 197–242.

¹²⁴ McDonald, *Voting Rights in the South*, 43–46

Numbered posts (another method of at-large voting) were another way to discriminate against Black voters and Black candidates. When, for instance, there were three open positions for county commissioner, rather than electing the three candidates with the highest vote totals, candidates had to run specifically for seats No. 1, No. 2, and No. 3, diminishing the chances of electing Black candidates. From 1975 to 1982, the Attorney-General objected to 60 submissions involving numbered posts, many from Georgia. Dawson, Kingsland, and St. Mary's all adopted numbered posts elections for the city council in the 1960s and 1970s, none of them applying for preclearance in doing so.¹²⁵

Staggered voting was another technique used to limit Black voting strength, by limiting the numbers of open seats at any one time and making it more difficult to Black candidates to get elected, particularly if combined with at-large voting schemes. Peach County, for example, staggered the election of its county commissioners starting in 1968, and the city of Kingsland did the same in 1976 without seeking preclearance.¹²⁶

Annexations of territory by cities to decrease the percentage of the Black population were, through 1982, the most common type of suit brought by the DOJ. The city of Jackson, for example, used annexation to limit Black voting strength until enjoined in 1981.¹²⁷

There were many other forms of Section 5 noncompliance in Georgia. In 1981, Julian Bond, a Georgia State Senator, testified before the House of Representatives that there were over four hundred non-submissions of Section 5 notifications by Georgia jurisdictions.¹²⁸ Many jurisdictions in Georgia simply refused to comply with Section 5 objections, such as Sumter County, Pike County, and Waynesboro. Other jurisdictions, such as Thomson, when faced with a Section 5 objection to majority voting, city officials encouraged the two white candidates to have an informal "run-off" to avoid splitting the white vote and allowing the Black candidate to win. This practice, known as "cuing," the endorsement by white community leaders of a specific

¹²⁵ Ibid. at 50–51.

¹²⁶ Ibid. at 51–52

¹²⁷ Ibid. at 52–53

¹²⁸ "Testimony of Julian Bond, State Senator from Georgia, Extension of the Voting Rights Act: Hearings Before the Subcommittee on Civil and Constitutional Rights of the Committee of the Judiciary," May–July 1981.

candidate prior to the actual election, is in the words of Laughlin McDonald, “doing by indirection that which Section 5 expressly forbids.”¹²⁹

Overall, the number of VRA Section 5 preclearance challenges raised by private or federal suit show that Georgia was one of the most active and ingenious in trying to prevent Black voting strength. From 1965 to 1981, the DOJ received a total of 34,798 voting changes submitted for preclearance under Section 5. DOJ ultimately objected to 815 of these proposed changes, and of those, 226, or almost 30 percent, were from the state of Georgia.¹³⁰ This figure far exceeds that of other states. Louisiana, for example, the state that was subject to the second-most number of objections, was only the subject of 136 objections, which is just a little over half of Georgia’s objections.¹³¹

This number likely significantly undercounts the number of actual and potential § 5 violations in Georgia prior to the 1982 reauthorization of the VRA. In a 1984 article, Drew Days and Lani Guinier estimated that “covered jurisdictions have made literally hundreds of changes that have never met the preclearance requirement of Section 5,” and that the DOJ “has not been able to ensure that every electoral change by covered jurisdictions, or indeed most of them, was subjected to the Section 5 process.”¹³² In another study, based on interviews with local attorneys in Georgia and Mississippi involved in voting issues found that 36.4% of attorneys that responded to the survey reported that local jurisdictions went ahead with election changes despite a pending preclearance request. The survey revealed other ways of gaming the VRA system—waiting until shortly before the election to file the Section 5 request, not giving the DOJ adequate time to respond, or alternatively, exhaustively arguing every nuance of a Section 5 request, hoping to win outright, or at least gain an advantage by exhaustion and attrition.¹³³ Even still, as noted, between 1965 and 1980, DOJ objected to more than 200 changes submitted by Georgia under Section 5.¹³⁴

In 1969, the United States Supreme Court in *Allen v. State Board of Elections*, 393 U.S. 544 (1968), made clear that changes made under preclearance under Section 5 of the VRA were to be construed broadly because to limit its scope to a specific set of voting restrictions would be

¹²⁹ McDonald, *Voting Rights in the South*, 60.

¹³⁰ *Ibid.*, 20-25.

¹³¹ *Id.*

¹³² Drew Days III and Lani Guinier, “Enforcement of Section 5 of the Voting Rights Act,” in Chandler, *Minority Vote Dilution*, 168.

¹³³ Ball et al., “The View from Georgia and Mississippi.”

¹³⁴ McDonald, *Voting Rights in the South*, 20–23.

“underestimating the ingenuity of those bent on keeping Negroes from voting.” The *Allen* Court also made clear that preclearance extended to reapportionment plans.¹³⁵

Georgia’s congressional reapportionment in 1971 was the first held under Section 5 preclearance rules, and it showed, in the words of Laughlin McDonald, “the extraordinary lengths to which the legislature was prepared to go to exclude Blacks from the congressional delegation.”¹³⁶ A plan proposed by two Black state senators to increase the Black percentage of Georgia’s Fifth congressional district from 34 to 45% was defeated 45 to 9. The plan which was approved by the Georgia General Assembly carved the Black population in the Fourth, Fifth, and Sixth Districts to give the Fifth district a substantial white majority, with the Fifth district as 38% Black, and specifically excluded from the district the homes of Andrew Young—who had unsuccessfully run for Congress in the district in 1970—and Maynard Jackson, another budding Black politician.

The Georgia General Assembly’s 1971 reapportionment plan was rejected by the Department of Justice under Section 5. Under a revised reapportionment plan, the Fifth District was 44.2% Black, in 1972, Georgian Andrew Young (along with Barbara Jordan in Texas), significantly both were elected from urban districts, became the first African Americans elected to the United States House of Representatives from the South in the twentieth century. Young was elected three times, resigning his seat in 1977 to become President Carter’s ambassador to the United Nations. It would take over a decade for another Black Georgian to be elected to the United States Congress from the state of Georgia.¹³⁷

H. End of the Twentieth Century (1980s–2002)

In the redistricting cycle after the 1980 census, the Georgia General Assembly again tried to limit Black voting strength in Atlanta. The Georgia General Assembly’s reapportionment plan contained white majorities in nine of the ten congressional districts, even though Georgia’s population at the time was nearly 30% Black. Julian Bond, by then a Georgia state senator, introduced a bill that would have made the Fifth congressional district 69% Black. In response, the Chair of the Senate Reapportionment Committee criticized the proposal as one that would

¹³⁵ Cited in Orville Vernon Burton and Armand Derfner, *Justice Deferred: Race and the Supreme Court* (Cambridge, MA: Harvard University, 2021), 228.

¹³⁶ McDonald, *A Voting Rights Odyssey*, 149.

¹³⁷ Bullock, “History of Redistricting,” 1065–66; McDonald, *A Voting Rights Odyssey*, 149–150.

cause “white flight.” The Chair of the House Reapportionment Committee similarly criticized the proposal on the grounds that he was disinclined to draw “nigger districts” or support “nigger legislation.”¹³⁸ Some members of the Georgia General Assembly stated they did not want to go back to their districts and “explain[] why I was a leader in getting a black elected to the United States Congress.” Bond’s proposal was predictably rejected, and the reapportionment plan drawn by the Georgia General Assembly was, as in the previous decade, rejected under Section 5 of the Voting Rights Act. The Court then approved a new plan with a district that was 65% Black. Julian Bond and John Lewis, two old friends and comrades from the Student Nonviolent Coordinating Committee (SNCC), vied for the seat; Lewis ultimately won.¹³⁹

In 1980, Laughlin McDonald noted that of the 18 Black Georgians elected to county governments—about only 3% of all office holders—16 of them were elected in majority Black districts or counties. As McDonald wrote in 1982, “blacks in Georgia’s majority white counties or districts, for all practical purposes, cannot get elected.”¹⁴⁰

On the eve of the possible expiration of the VRA in the early 1980s, Georgia continued to show that such an extension was necessary. In 1980, DeKalb County adopted a policy that it would no longer approve community groups to conduct voter registration drives.¹⁴¹ In 1981, Georgia was blocked from changing the rules about who could help voters at the polls under Section 5.¹⁴² The early 1980s also saw continued use of voter challenges against Black voters. In 1981, white Georgians on the northside of Atlanta formed the Voter Information Project (VIP), which used Georgia’s voter challenge law to dispute the right to vote of more than 50,000 registered voters in Fulton County, including 37,000 urban voters. Of these challenged voters, 58 percent were African

¹³⁸ McDonald, *A Voting Rights Odyssey*, 168-173.

¹³⁹ *Id.*

¹⁴⁰ McDonald, *Voting Rights in the South*, 40-43.

¹⁴¹ “Testimony of Julian Bond, State Senator from Georgia, Extension of the Voting Rights Act: Hearings Before the Subcommittee on Civil and Constitutional Rights of the Committee of the Judiciary,” May-July 1981, 54-55.

¹⁴² Sept. 18 Letter from William Bradford Reynolds to Michael Bowers at 2-3 (1981), quoted in Expert Witness Report of Dr. Peyton McCrary at 8, 18 (“McCrary Report”), *Fair Fight v. Raffensperger*, No. 1:18-cv-05391-SCJ (N.D. Ga. 2020), ECF No. 339. According to the 1970 census data (the latest available at the time of the DOJ objection), in Georgia, only 8 percent of whites over the age of 25 had completed less than five years of school while 32 percent of Blacks over the age of 25 had completed less than five years of school (also cited in McCrary).

Americans. As a result, in 1981, one in five registered voters was purged from Fulton County's voters' rolls.¹⁴³

That same year, the *New York Times* summarized the status of Black voters in Georgia as the country debated the 1982 re-authorization of the VRA:

"26.2 percent of the population is black, only 3.7 percent of the elected officials are black. The glitter of power in Atlanta, where two blacks are among the three frontrunners to succeed the city's two-term black mayor, Maynard Jackson. In fifteen of the state's twenty-two counties where blacks comprise a majority or close to it, no blacks serve on county commissions. It is not for want of trying; 34-year-old Edward Brown Jr. has twice run unsuccessfully for office in Mitchell Co. In Mr. Brown's instance, all-white poll officials and paper ballots greatly reduced his chances for winning. Testifying in a court case, Mr. Brown stated that it is difficult to win when whites as a matter of policy vote against blacks. Citing his defeats, he said that whites were transported to and from polling places by county sheriffs who urged them not to vote for Mr. Brown "because he's a nigger."¹⁴⁴

When Congress did re-authorize the VRA in 1982, it cited systemic abuses by Georgia officials to evade Black voting rights.¹⁴⁵

At the end of the decade, Georgia again began another reapportionment cycle. Over the course of the 1990 redistricting cycle, the Department of Justice twice rejected the Georgia General Assembly's state's reapportionment plan, before finally approving the third submission.¹⁴⁶ After the 1992 election, a total of thirty-four African Americans were in the Georgia General Assembly, almost all of them from Black majority districts, almost all of whom owed their seats to litigation and to Section 5 of the Voting Rights Act.

I. Modern Era (2000s to Present Day)

Voter suppression tactics that have plagued Georgia's history have persisted into the modern era. These policies around voting have also come at a time of rapid demographic shifts in Georgia's electorate: Georgia is the only state in the Deep South where the percentage of the Black population has sharply increased over the past half century. Because of the remarkable growth of

¹⁴³ Barry King, "Notices Sent on Fulton Voter Purge," *The Atlanta Constitution* (Atlanta, GA), March 3, 1981; Jim Walls, "One in Five Voters Dropped From Rolls," *The Atlanta Constitution* (Atlanta, GA), April 16, 1981; Frederick Allen, "Voter Challenges Seen Through a Glass Darkly," *The Atlanta Constitution* (Atlanta, GA), September 15, 1981.

¹⁴⁴ Stuart, "Once Again a Clash Over Voting Rights," *N.Y. Times* (Sept. 27, 1981).

¹⁴⁵ S. Rep. No. 97-417, 97th Cong. 2d Sess. 10, 13 (1982).

¹⁴⁶ McDonald, *A Voting Rights Odyssey* 211–224.

metro Atlanta and its four core counties, Fulton, DeKalb, Gwinnett, and Cobb, these changing demographics in Georgia—especially its Black, Latino/a, and Asian populations, who tend to support Democratic candidates—combined with minority voter mobilization efforts are the “likeliest threat to Republican domination of Georgia elections.”¹⁴⁷

i. 2000s through 2010 Redistricting

For the fourth decade in a row, in the 2000 redistricting cycle the Georgia General Assembly passed redistricting plans that would not survive preclearance. Specifically, the district court in the District of Columbia refused to preclear the General Assembly’s Senate plan which decreased the Black voting age percentage in the districts surrounding Chatham, Albany, Dougherty, Calhoun, Macon, and Bibb Counties. Overall, the court found “the presence of racially polarized voting” and that “the State ha[d] failed to demonstrate by a preponderance of the evidence that the reapportionment plan for the State will not have a retrogressive effect.” *Georgia v. Ashcroft*, 195 F.Supp. 2d 25, 94 (D. D.C. 2002), *affirmed*, *King v. Georgia*, 537 U.S. 1100 (2003).

The 2002 election proved to be a watershed moment for the state of Georgia. For nearly half a decade, white voters in Georgia had been abandoning the Democratic Party for the Republican Party. When Republican Sonny Perdue defeated Democrat incumbent Roy Barnes as governor in 2002, the election “broke a Democratic stronghold on the Georgia governorship that had kept the GOP out since Reconstruction.”¹⁴⁸ In the 2004 election, Republicans also won the majority of House seats, shifting control of the legislature.

Georgia was the first state covered by Section 5 of the VRA to pass an in-person voter identification law. In 2005, the Georgia General Assembly promptly passed a photo ID law, limiting Georgians to only six acceptable forms of identification. Voters who lacked acceptable identification could purchase one from the state for \$20 to \$35. Sue Burmeister, the Georgia State Senator who had introduced the photo ID legislation, said in testimony before the Department of

¹⁴⁷ McCrary Report at 37; on the increasing influence of Latina/Latino peoples, see Victor Zuniga and Reuben Hernandez Leon, “The Dalton Story: Mexican Immigration and Social Transformation in the Carpet Capital of the World,” 34-50 and Mary E. Odem, “Latino Immigrants and the Politics of Space in Atlanta,” 112-125 in Mary E. Odem and Elaine Lacy, eds., *Latino Immigrants and the Transformation of the U.S. South* (University of Georgia Press, 2009).

¹⁴⁸ Danny Hayes and Seth C. McKee, “Booting Barnes: Explaining the Historic Upset in the 2002 Georgia Gubernatorial Election,” *Politics and Policy* 32 (December 2004), 1, quoted in McCrary Report at 29.

Justice that “if there are fewer black voters because of the bill, it will only be because there is less opportunity for fraud,” and that “when Black voters in her Black precincts are not paid to vote, they do not go to the polls.”¹⁴⁹ Shortly after the law’s enactment, the U.S. District Court for the Northern District of Georgia preliminary enjoined the law, finding the photo ID law was “most likely to prevent Georgia’s elderly, poor, and African–American voters from voting.” *Common Cause/Georgia v. Billups*, 406 F. Supp. 2d 1326, 1365–66 (N.D. Ga. 2005). In reaction to the injunction, the Georgia General Assembly was forced to make the voter ID cards free.

Several years later, following the 2010 U.S. Census, white Republican Georgia lawmakers worked not only to maintain power but to create a super-majority through redistricting. The Georgia General Assembly’s reapportionment plan created a record number of majority-Black districts, which by packing Black votes together, solidified Republican holds in the surrounding districts. Ultimately, the Georgia Republican Party was successful in achieving a super-majority in the Senate; it fell one seat short of a super-majority in the House.¹⁵⁰

In 2015, the Georgia General Assembly engaged in mid-cycle redistricting after the Supreme Court invalidated Section 5’s preclearance formula in *Shelby County, Alabama v. Holder*, 570 U.S. 529 (2013).¹⁵¹ No longer subject to preclearance, the Georgia General Assembly reduced the Black and Latina/o voting age percentage in House districts 105 and 111, both of which had become increasingly diverse over the prior half-decade (and unlikely to elect Republicans).¹⁵² Plaintiffs initially brought suit over the changes under Section 2 of the Voting Rights Act, but the continued migration of voters of color into those districts rendered the General Assembly’s changes obsolete. After minority candidates prevailed in those districts in 2018, the plaintiffs withdrew their complaint.¹⁵³

¹⁴⁹ Carol Anderson, *One Person, No Vote: How Voter Suppression is Destroying Our Economy* (New York: Bloomsbury, 2018), 60–62; Ari Berman, *Give Us the Ballot: The Modern Struggle for Voting Rights in America* (New York: Picador, 2015) 222–224, 226–229; Stacey Abrams, *Our Time is Now: Power, Purpose, and the Fight for a Fair America* (New York: Henry Holt, 2020), 75–76

¹⁵⁰ Charles S. Bullock III, “The History of Redistricting in Georgia,” *Georgia Law Review* 52, no. 4 (2018): 1095–1098; Expert Report of Laughlin McDonald at 17, *Dwight et al. v. Kemp*, ECF No. 178 (Aug. 6, 2018).

¹⁵¹ Expert Report of Jowei Chen, *Georgia State Conference of NAACP v. State of Georgia*, No. 1:17-cv-1427, ECF No. 63 (N.D. Ga. Dec. 22, 2017).

¹⁵² *Id.*

¹⁵³ *Georgia State Conference of NAACP*, No. 1:17-cv-1427, ECF No. 221.

ii. State-Sponsored Voter Investigations

As in Georgia's past, modern-day elected officials, law enforcement officers, and political activists have continued to harass and intimidate Black voters and candidates in order to maintain political power. Nowhere is this more obvious than in Quitman, Georgia—a predominantly Black city in otherwise predominantly white Brooks County. In the early 2000s, Nancy Dennard, a Black educator, won a 2009 special election to the Brooks County School Board through a campaign that targeted citizens “who had never voted before” and who had problems getting to the polls on election day. At the time, Dennard's opponent complained about the large number of absentee ballots cast for Dennard. The Georgia secretary of state's office conducted a brief investigation but found no evidence of fraud.¹⁵⁴

The next year, two more Black women and allies of Dennard—Diane Thomas and Linda Troutman—ran for seats on the school board and again worked to increase voter turnout through absentee voting. This time, the Brooks County School Board hired a private investigator to track Dennard and her allies. More than 1,400 Black voters participated in the Democratic primary election for school board that year—three times the turnout in previous midterm elections—and Thomas and Troutman were elected as the Democratic Party's nominees. In response, then-Secretary of State Brian Kemp (in cooperation with the Georgia Bureau of Investigation) opened a formal investigation into the 2010 election in Quitman.¹⁵⁵

Six weeks after Thomas and Troutman won seats on the school board, state and local police arrested Dennard, Thomas, Troutman, and seven other people. Two more women were arrested a year later. The “Quitman 10+2,” as they came to be known, were collectively charged with 102 felony counts. Prosecutors alleged that organizers had provided unlawful assistance to voters and had unlawfully possessed ballots when they delivered sealed ballots to the post office. Despite a paucity of evidence, Kemp doggedly pursued a case against the Quitman 10+2, only backing down in 2016 when Georgia's attorney general issued an opinion clarifying that it was not a violation of the law for organizers to mail absentee ballots.

¹⁵⁴ John Ward, “How a Criminal Investigation in Georgia Set an Ominous Tone for African-American Voters,” Yahoo! News, August 6, 2019. <https://news.yahoo.com/how-a-criminal-investigation-in-georgia-set-a-dark-tone-for-african-american-voters-090000532.html> (accessed April 27, 2021).

¹⁵⁵ Ward, “How a Criminal Investigation in Georgia Set an Ominous Tone for African-American Voters.”

Afterward, Dennard argued the investigation and prosecution were an attempt to disqualify Black officeholders and stifle Black political activism. She insisted, “[T]hey thought they could make an example out of me, and that would kill the spirit of this movement.”¹⁵⁶ Thomas interpreted the Quitman 10+2’s arrest and investigation by explaining that “the message sent to our citizens was, if you don’t want the GBI to come visiting and put you in jail, you better not vote.”¹⁵⁷

In 2014, in comments to a group of Republican voters in Gwinnet County, then-Secretary of State Brian Kemp made clear the connection between minority voting rights and election victories when he remarked that “the Democrats are working hard . . . registering all these minority voters that are out there and . . . if they can do that, they can win these elections in November.”¹⁵⁸ Around the same time, Kemp’s office launched a criminal investigation into the New Georgia Project, an organization with the explicit goal of registering Georgia’s unregistered minority voters. The New Georgia Project was later cleared of any wrongdoing.¹⁵⁹

In 2015, Kemp’s office similarly launched an investigation into the Asian American Legal Advocacy Center (“AALAC”), an organization which had previously criticized Secretary Kemp for not registering all voters who had submitted voter registrations to Georgia. Secretary Kemp pursued the investigation for over two years before finding no evidence of wrongdoing. One journalist tracking these investigations described them as “legal terrorism, exploiting the law to intimidate and discourage citizens from accessing their constitutional right to vote.”¹⁶⁰

¹⁵⁶ Ward, “How a Criminal Investigation in Georgia Set an Ominous Tone for African-American Voters.”

¹⁵⁷ Ariel Hart, “Voting Case Mirrors National Struggle,” *The Atlanta Journal-Constitution*, December 13, 2014; Gloria Tatum, “Voter Fraud Charges from 2020 Fizzle in Quitman, South Georgia,” *The Atlanta Progressive News*, September 18, 2014, <http://atlantaprogressivenews.com/2014/09/18/voter-fraud-charges-from-2010-fizzle-in-quitman-south-georgia/> (accessed April 27, 2021).

¹⁵⁸ Steve Benen, “Georgia GOP Official Express Concerns About ‘Minority Voters,’” MSNBC, September 11, 2014. <https://www.msnbc.com/rachel-maddow-show/georgia-gop-official-express-concerns-about-minority-voters-msna410401> (accessed April 27, 2021).

¹⁵⁹ Spencer Woodman, “Register Minority Voters in Georgia, Go to Jail,” *The New Republic*, May 5, 2015, <https://newrepublic.com/article/121715/georgia-secretary-state-hammers-minority-voter-registration-efforts> (accessed May 10, 2021); “State launches fraud investigation into voter registration group,” *WSB-TV 2* (Atlanta, Georgia), September 9, 2014;

¹⁶⁰ Austin Adkins, “Opinion: Voter Fraud Investigations Weaponized to Suppress Voters,” *The Mainline*, November 3, 2019, <https://www.mainlinezine.com/voter-fraud-investigations-weaponized-to-suppress-voters/>; Michael Wines, “Critics See Efforts by Counties and Towns to

iii. Voting Restrictions in Georgia Post-*Shelby County*

After the Supreme Court invalidated the existing coverage formula in *Shelby County, Alabama v. Holder*, 570 U.S. 529 (2013), Georgia was no longer bound to submit any changes it made to its voting system through a preclearance regime. In her dissent in that case, Justice Ginsburg famously commented that “throwing out preclearance when it has worked and is continuing to work to stop discriminatory changes is like throwing away your umbrella in a rainstorm because you are not getting wet.” *Id.* at 590 (J. Ginsburg, dissenting). A few days after the decision, Daniel O. Franklin, a professor of political science at Georgia State University, predicted that “the court’s decision will likely change very little” in Georgia and the other preclearance states.¹⁶¹ Franklin was wrong: Georgia took advantage of this change almost immediately.

Within four days of *Shelby County*, for example, the local Georgia press reported that the Augusta-Richmond County government (a consolidated city-county government) re-opened discussions of moving its elections from November to July. This change matters: Moving elections away from the usual election day, invariably reduces voter turnout and usually has an adverse impact on minority voter turnout, and DOJ had previously rejected the proposed change under Section 5. After a series of closed-door meetings, Augusta-Richmond County government changed the date of their elections in early 2014, just months after *Shelby County*.¹⁶² Similarly, Greene County, Georgia approved a redistricting plan that would have eliminated one or two of the only Black districts on the county commission—a change that DOJ had previously refused to preclear. By the end of 2013, the Georgia General Assembly approved another plan for Greene County that reduced the Black voting age population in one district by 50% and placed the home of the other

Purge Minority Voters From Rolls,” *New York Times* (New York, NY), July 31, 2016, <https://www.nytimes.com/2016/08/01/us/critics-see-efforts-to-purge-minorities-from-voter-rolls-in-new-elections-rules.html>; Kristina Torres, “Georgia suit settled alleging black voters wrongfully disqualified,” *Atlanta Journal-Constitution* (Atlanta, GA), March 16, 2017, <https://www.ajc.com/news/state--regional-govt--politics/georgia-suit-settled-alleging-black-voters-wrongfully-disqualified/djDIYjpvYJcZW8CJzgKL/>.

¹⁶¹ Daniel P. Franklin, “Court’s Decision is Likely to Change Little,” *Atlanta Journal Constitution* (June 30, 2013).

¹⁶² Harry Baumgarten, “*Shelby County v. Holder*’s Biggest and Most Harmful Impact May Be On Our Nation’s Smallest Towns,” Harry Baumgarten, Campaign Legal Center, 20 June 2016, <https://campaignlegal.org/update/shelby-county-v-holders-biggest-and-most-harmful-impact-may-be-our-nations-smallest-towns>

Black commissioner outside of the boundaries of the newly redrawn district. Without preclearance, the new redistricting plan went into effect.¹⁶³

But preclearance itself was never a panacea even before *Shelby County*. With Georgia's 159 counties and hundreds of local jurisdictions (part of the over 30,000 jurisdictions in the preclearance states), it was impossible to keep track of every local jurisdiction, many of which refused to file voting-related changes with DOJ. At-large, county-wide, or city-wide voting has been historically one of the main tactics used to curb voting rights strength. Preclearance had hardly ended the practice. In December 2013, of Georgia's 159 counties, thirty-four elected all county commissioners at-large. One of those was Baker County, where almost half of the population was Black, but all of the county commissioners were white. A former Baker County Commissioner, Robert Hall, was quoted in the *Atlanta Journal Constitution* as saying, "we don't have many Blacks in Baker County that are landowners and taxpayers and responsible."¹⁶⁴ This trend is not unique to Baker County. In December 2013, the *Atlanta-Journal Constitution* reported that across Georgia, while "more than half of majority-black counties have majority-white commissions," "no majority-white county has a majority-black commission."¹⁶⁵ These type of election arrangements continue to disadvantage Black Georgians: As of 2013, in Georgia, white Georgians were 59% of registered voters, but accounted for 77% of the commissioners, while for Black Georgians who were 30% of registered voters, but accounted for only 22% of county commissioners.¹⁶⁶

Overall, the end of preclearance has opened the doors to all manner of voter suppression and disenfranchisement, largely directed against minorities. The U.S. Commission on Civil Rights, found that among the former preclearance states as of 2018, only Georgia had adopted all five of the most common restrictions that impose roadblocks to the franchise for minority voters, including (1) voter ID laws, (2) proof of citizenship requirements, (3) voter purges, (4) cuts in

¹⁶³ Ariel Hart, Jeff Ernsthausen, and David Wickett, "Disputed Voting Systems, Racial Power Gap Persists," *Atlanta Journal Constitution*, (Dec. 7, 2013).

¹⁶⁴ *Id.*

¹⁶⁵ *Id.*

¹⁶⁶ *Id.*; Ariel Hart, Jeff Ernsthausen, and David Wickett, "Racial Politics Not So Clear Cut," *Atlanta Journal Constitution*, (Dec. 9, 2013)

early voting, and (5) widespread polling place closures.¹⁶⁷ This report discusses a few of these changes below, concluding with a brief overview of Senate Bill 202, passed by the Georgia General Assembly in 2021, which the U.S. Department of Justice has challenged under Section 2 of the Voting Rights Act as a law with the effect and intent of making it more difficult for Black Georgians to vote.

a. Polling Place Closures

In a 2015 memo to local election officials, then-Secretary of State Kemp encouraged counties to reduce voting locations, noting that “as a result of the *Shelby vs. Holder* [sic] Supreme Court decision, [counties are] no longer required to submit polling place changes to the Department of Justice for preclearance.”¹⁶⁸ And to be sure, in the first presidential election after *Shelby County*, throughout Georgia “dozens of polling places” were “closed, consolidated, or moved.”¹⁶⁹ In Macon-Bibb County, a majority-Black county, the number of polling places dropped from forty to thirty-two; those closures took place in primarily Black neighborhoods. When the Memorial Gym precinct in Macon, in a Black neighborhood, was closed for renovations, local officials suggested the sheriff’s office as an alternative. Lowndes County, which has a substantial Black population, reduced the number of polling places from thirty-seven to nine, and Tift County was considering, until heated local protests, consolidating all twelve county polling places into a single location. Hancock County proposed closing several polling places, including one in a Black neighborhood that was seventeen miles from its nearest alternative, in downtown Sparta. Hancock County relented only after an outcry from the Georgia NAACP and the Georgia Lawyers’ Committee for Civil Rights Under the Law, who claimed that “the planned closures would have

¹⁶⁷ U.S. Commission on Civil Rights, *An Assessment of Minority Voting Rights Access in the United States: 2018 Statutory Enforcement Report* (Washington, 2018), 369. The restrictions on naturalized citizens were later curtailed; see “Georgia Must Ease Rules Proving Citizenship, Judge Says” PBS News Hour, <https://www.pbs.org/newshour/politics/georgia-must-ease-rule-for-voters-proving-citizenship-judge-says> (Nov. 2, 2018).

¹⁶⁸ The Leadership Conference Education Fund, *Democracy Diverted: Polling Place Closures and the Right to Vote* (Sept. 2019), 32. According to this report, then-Secretary of State Kemp “encouraged counties to consolidate voting locations. He specifically spelled out twice – in bold font – that noting that ‘as a result of the *Shelby vs. Holder* Supreme Court decision, [counties are] no longer required to submit polling place changes to the Department of Justice for preclearance.’”

¹⁶⁹ Kristina Torres, “Cost-Cutting Raises Voter Access Fears,” *Atlanta Journal Constitution*, (Oct. 13, 2016); Kristina Torres, “State Monitored For Voting Rights Issues,” *Atlanta Journal Constitution*, (Jun. 20, 2016).

disproportionately affected voters in the majority Black county in poor and rural areas with no access to regular transportation.”¹⁷⁰

By 2019, the Leadership Conference Education Fund found that Georgia had closed over 200 polling locations in Georgia since the *Shelby County* decision despite adding millions of voters to the voter rolls.¹⁷¹ By 2019, “eighteen counties in Georgia closed more than half of their polling places, and several closed almost 90 percent.”¹⁷² In 2020, the nine counties in metro Atlanta that had nearly half of the registered voters (and the majority of the Black voters in the state) had only 38% of the state’s polling places.¹⁷³ Unsurprisingly, because of the fewer polling places, the lines at majority-Black polling places increased, and sometimes dramatically so. In the June 2020 primary, for example, waiting times to vote in some metro Atlanta suburbs, such as Union City (a subdivision that is 88% Black majority) was as long as five hours.¹⁷⁴ Union City was not an outlier. A 2020 study found that “about two-thirds of the polling places that had to stay open late for the June primary to accommodate waiting voters were in majority-Black neighborhoods, even though they made up only about one-third of the state’s polling places.”¹⁷⁵

b. Voter Purges and Challenges

After *Shelby County*, Georgia officials also made more systematic efforts to purge the voting rolls in ways that particularly disadvantaged minority voters and candidates. Between 2012 and 2018, for example, then-Secretary of State Kemp removed 1.4 million voters from the eligible voter rolls. In a single day in 2017, Georgia removed over 500,000 names from the list of 6.6 million registered voters, which according to election law experts might be the “largest mass disenfranchisement in U.S. history.”¹⁷⁶ While there can be legitimate reasons to drop names from

¹⁷⁰ *Id.*

¹⁷¹ The Leadership Conference Education Fund, *Democracy Diverted: Polling Place Closures and the Right to Vote* (Sept. 2019), 31.

¹⁷² *Id.*

¹⁷³ Stephen Fowler, “Why Do Nonwhite Georgia Voters Have to Wait in Line for Hours? Their Numbers Have Soared, and Their Polling Places Have Dwindled,” *ProPublica*, <https://www.propublica.org/article/why-do-nonwhite-georgia-voters-have-to-wait-in-line-for-hours-their-numbers-have-soared-and-their-polling-places-have-dwindled>, (Oct. 17, 2020).

¹⁷⁴ Mark Niese and Nick Thieme, “Fewer Polls Cut Voter Turnout Across Georgia,” *Atlanta Journal Constitution*, 15 December, 2009; Fowler, “Why Do Nonwhite Georgia Voters Have to Wait in Line for Hours?”

¹⁷⁵ Fowler, “Why Do Nonwhite Georgia Voters Have to Wait in Line for Hours?”

¹⁷⁶ Alan Judd, “Georgia’s Strict Laws Lead to Large Purge of Voters,” *Atlanta Journal Constitution*, 27 October, 2018.

the eligibility rolls (such as for a voter who is deceased, who has moved, or who has a felony conviction), the vast majority of those purged were those who simply had not voted in intervening years. While those kinds of purges are technically permitted (though not required) by federal law, those purged were significantly over-represented in precincts that overwhelmingly voted for Stacey Abrams, the Black candidate in the 2018 gubernatorial race.¹⁷⁷

One of the most insidious forms of voter disenfranchisement by Georgia in recent years which disproportionately affected minority voters was Georgia’s “exact matching” procedures. As the Northern District of Georgia has explained, Georgia’s exact match procedures policies meant that when a prospective voter submitted a voter registration application, Georgia would check the registration against its Department of Driver Services (“DDS”) or files from the Social Security Administration (“SSA”). If the applicants’ information did not match those files exactly, “then the voter registration application is placed in ‘pending status,’ and the person may not vote until the person corrects the information. The burden is on the applicant to take the next steps to correct any information and/or present the necessary proof required to the appropriate officials to become a Georgia voter.” *Georgia Coal. for People's Agenda, Inc. v. Kemp*, 347 F. Supp. 3d 1251, 1255–56 (N.D. Ga. 2018). If the voter did not present new information, their application was rejected. *Id.*

The legal history of exact-match legislation in Georgia is complex. It was originally passed by the Georgia General Assembly in 2008, and was originally blocked under preclearance, though it received Department of Justice approval in 2010 when the Secretary of State agreed to place “safeguards” on the practice. As the Department of Justice later argued, however, it is not clear if those safeguards were ever used. After *Shelby County*, Georgia operated the exact match procedures without strict safeguards, leading to federal suits such as the one above.

As civil rights groups have shown, Georgia’s exact match procedures were more likely to disenfranchise minority voters. Between 2013 and 2016, more than 34,000 Georgia voters’ applications were suspended using the exact-match system. Under the DDS match, Black Georgians, who made up only 28.2 percent of the registered voters, were 53.3 percent of those voters whose applications were cancelled or placed in pending status. By contrast, non-Hispanic

¹⁷⁷ Angela Caputo, Geoff Hing, and Johnny Kaufman, “After the Purge: How a Massive Voter Purge Affected the 2018 Election,” APM Reports, <https://www.apmreports.org/story/2019/10/29/georgia-voting-registration-records-removed> (Oct. 29, 2019).

whites, who were almost half of registered voters in Georgia, made up a far lower 18.3 percent of those applications that were canceled or pending. Under the SSA match, the discrepancy was even starker. Black Georgians made up 74.6 percent of those in the cancelled and pending files, while non-Hispanic whites were only 9.5 percent. By July 2018, 51,111 voters' applications were suspended, and placed in the "pending voter" category, of whom 80% were either African American, Hispanic/Latino, or Asian.¹⁷⁸ By 2019, Georgia agreed to largely abandon its exact matching process.¹⁷⁹

Voter challenges directed at minority voters have also persisted in modern Georgia. In advance of the 2016 election, the Hancock County Election Board, which at the time was majority white, used the voter challenge process to challenge approximately 180 voters, almost all of whom were Black. Those Black residents made up nearly a fifth of the city's registered voters. In pursuit of the challenges, the Hancock County Board dispatched the local police to summon those Black residents to hearings to prove their residence or lose their voting rights. Many thought they were being arrested, and many of those challenged were intimidated and did not vote in the fall election. The white candidate for mayor won a narrow victory.¹⁸⁰

Although the Hancock County attorney denied that this purge was "about . . . race," the Georgia State Conference of the NAACP, the Georgia Coalition for the People's Agenda, and four voters who had their registrations challenged sued the Hancock County Board of Elections seeking an injunction to force the Board to end their use of the challenge procedures. The U.S. District Court for the Northern District of Georgia later ordered the defendants to pay the plaintiffs'

¹⁷⁸ Abrams, *Our Time is Now*, 58–61; Anderson, *One Person, No Vote*, 78–81; McCrary Report.

¹⁷⁹ Aja Arnold, "Ex Post Facto: Abrams v Kemp," *The Mainline* 11 May 2020, <https://www.mainlinezine.com/ex-post-facto-abrams-vs-kemp-2018/>; Brentin Mook, "How Dismantling the Voting Rights Act Helped Georgia Discriminate Again," *Bloomberg City Lab*, 15 October, 2018, <https://www.bloomberg.com/news/articles/2018-10-15/how-georgia-s-exact-match-program-was-made-possible>; Stanley Augustin, "Georgia Largely Abandons its Broken 'Exact Match' Voter Registration Process," *Lawyers' Committee For Civil Rights*, 5 April, 2019, <https://www.lawyerscommittee.org/georgia-largely-abandons-its-broken-exact-match-voter-registration-process/>

¹⁸⁰ Michael Wines, "Critics: Racial Bias Creeping Back Into Electoral Purges," *Atlanta Journal Constitution*, 1 August, 2016

attorney fees and required the Board of Elections to follow a strict process that required the Board to notify the plaintiffs' counsel if the Board made any future voter challenges.¹⁸¹

c. Senate Bill 202

Of final note is the Georgia General Assembly's passage of Senate Bill (SB) 202 in the spring of 2021 in the wake of significant minority voting strength in Georgia and the election of Georgia's first Black United States Senator. SB 202 is currently the subject of multiple lawsuits which allege that it violates both Section 2 of the VRA and the Fourteenth and Fifteenth Amendments, including by the United States Department of Justice.¹⁸²

These allegations are not surprising. Many of the provisions of SB 202 target methods of voting that Black voters used to tremendous effect in the 2020 General Election and 2021 Runoff election, and also specifically target voting in the Atlanta metro area, home to the majority of Georgia's Black voters.¹⁸³ While SB 202 has more than 40 provisions, some of its most notable changes are: (1) reducing the time available to request an absentee ballot, (2) increasing identification requirements for absentee voting, (3) banning state and local governments from sending unsolicited absentee ballot applications, (4) limiting the use of absentee ballot drop boxes, (5) banning mobile polling places, (6) and prohibiting anyone who is not a poll worker from giving food or drink to voters in line to vote.¹⁸⁴

One of SB 202's most notable changes to voting access is to drop boxes, which were used extensively by Black voters in the 2020 General Election. In that election, in the four core Atlanta Metro counties, Cobb, DeKalb, Fulton, and Gwinnett, 56% of absentee ballot voters, or 305,000

¹⁸¹ *Ga. State Conference of the NAACP v. Hancock Cnty. Bd. of Elections & Registration*, No. 5:15-CV-00414 (CAR) (M.D. Ga. Mar. 30, 2018); Michael Wines, "Critics See Efforts by Counties and Towns to Purge Minority Voters From Rolls," *New York Times* (New York, NY), July 31, 2016, <https://www.nytimes.com/2016/08/01/us/critics-see-efforts-to-purge-minorities-from-voter-rolls-in-new-elections-rules.html>; Kristina Torres, "Georgia suit settled alleging black voters wrongfully disqualified," *Atlanta Journal-Constitution* (Atlanta, GA), March 16, 2017, <https://www.ajc.com/news/state--regional-govt--politics/georgia-suit-settled-alleging-black-voters-wrongfully-disqualified/djDIIfYjpvYJJcZW8CJzgKL/>

¹⁸² *See United States v. Georgia*, No. 1:21-cv-02575 (N.D. Ga. June 25, 2021).

¹⁸³ For a helpful summary, see Stephen Fowler, "What Does Georgia's New Voting Law SB 202 Do?" NPR, <https://www.gpb.org/news/2021/03/27/what-does-georgias-new-voting-law-sb-202-do>

¹⁸⁴ Georgia Senate Bill 202 (2021); see also Stephen Fowler, "What Does Georgia's New Voting Law SB 202 Do?" NPR, <https://www.gpb.org/news/2021/03/27/what-does-georgias-new-voting-law-sb-202-do>

of 547,000, used drop boxes.¹⁸⁵ After SB 202, the number of drop boxes in those counties will drop from the 111 available in the 2020 election to 23.¹⁸⁶ In Fulton County, the number will drop from 38 to 8. Cobb County Election Director Janine Eveler told the *Atlanta Journal-Constitution* that drop boxes “are no longer useful. The limited numbers mean you cannot deploy them in sufficient numbers to reach the voting population.”¹⁸⁷

SB 202 also made significant changes to how votes will be counted and who will supervise the counting. These changes included (1) removing the Secretary of State as the Chair of the State Election Board and replacing the Chair with someone appointed by a majority of the Georgia General Assembly, (2) giving the State Election Board (and by extension the Georgia General Assembly) more power to intervene in county election boards, and (3) allowing the State Election Board (and by extension the Georgia General Assembly) more power to suspend election board members and replace them.¹⁸⁸

The collective impact of these provisions is substantial. University of Georgia Political Scientist Charles Bullock explained that when all the obstacles in SB 202 are considered “as a package, the bill’s voting restrictions could deter thousands of people from voting in future elections” and could very well alter the outcome of close statewide races.¹⁸⁹ “Each new obstacle,” Dr. Bullock explained, “has the potential to stop voters ... from participating in democracy.”¹⁹⁰

Indeed, SB 202 is already being used against county election officials, and particularly Black officials. By June 2021, Georgia County commissions had replaced ten county election

¹⁸⁵ Niese, et. al., “Drop box use heavy in Democratic areas before Georgia voting law,” *Atlanta Journal-Constitution*, July 12, 2021, <https://www.ajc.com/politics/drop-box-use-soared-in-democratic-areas-before-georgia-voting-law/N4ZTGHLWD5BRBOUKBHTUCFVOEU/>.

¹⁸⁶ “How New State Voting Laws Could Impact Voters,” *Brennan Center for Justice*, September 1, 2021, <https://www.brennancenter.org/our-work/research-reports/how-new-state-voting-laws-could-impact-voters>.

¹⁸⁷ Mark Niese, “ID Law Adds Hurdles For Thousands,” *AJC*, 1 June, 2021; “Application For Official Georgia Absentee Ballot,” https://sos.ga.gov/admin/uploads/2021_Absentee_Ballot_Application2.pdf; “Democratic Counties Showed Higher Drop Box Use”

¹⁸⁸ Georgia Senate Bill 202 (2021); see also Stephen Fowler, “What Does Georgia’s New Voting Law SB 202 Do?”

¹⁸⁹ Mark Niese, *New Georgia law changes voting rules—and maybe results*, *Atlanta-Journal Constitution* (Mar. 28, 2021), available at <https://www.ajc.com/politics/new-georgia-law-changes-voting-rules-and-maybe-results/4QBKQXRS45GUZHBSQ67W4FVLR/>.

¹⁹⁰ *Id.*

officials, most Democrats, half of them Black.¹⁹¹ As of December 2021, six counties in Georgia have fully reorganized their county board of supervisors since the passage of SB 202. In Spaulding County, in particular, the three Black women who constituted a majority of the Board has been replaced, as has the elections supervisor. A majority of three white Republicans now control the board and has already moved to restrict voting access, including by eliminating Sunday voting.¹⁹² In five of the counties that restructured election boards—Troup, Morgan, Pickens, Stephens, and Lincoln—the legislature shifted the power to appoint some or all election board to local county commissioners, all of which are controlled by Republicans. Previously the appointments had been split evenly between the local Democratic and Republican parties, with the intent to ensure a politically balanced election board.¹⁹³ In December, 2021, Lincoln County, whose elections board was recently disbanded under SB 202, indicated plans to close six of the county’s seven polling places, a move that would require some registered voters to travel as far as twenty-three miles to the nearest polling site and which would disadvantaging the county’s Black voters.¹⁹⁴ And while it has not yet occurred, shortly after the passage of SB 202, the Georgia State Election Board set up a review board to review the performance of the Fulton County Election Board, setting up the prospect for a takeover of the Elections Board in Fulton, the home of hundreds of thousands of Black Georgians.¹⁹⁵

d. Electoral success of Black candidates.

Even today, more than fifty years after the original 1965 VRA, most Black candidates in Georgia are only able to win in districts which are majority Black. The following tables show just how stark this phenomenon has been in Georgia’s 2020 elections for the General Assembly. In the

¹⁹¹ Nick Corasanti and Reid J. Epstein, “How Republican States Are Expanding Their Power Over Elections,” *New York Times*, July 1, 2021, <https://www.nytimes.com/2021/06/19/us/politics/republican-states.html>; Mark Niese and Brad Branch, “Fulton County Elections Takeover Mulled,” 27 July, 2021

¹⁹² James Oliphant and Nathan Layne, Georgia Republicans purge Black Democrats from County Election Boards, Reuters, Reuters, 9 December 2021, <https://www.reuters.com/world/us/georgia-republicans-purge-black-democrats-county-election-boards-2021-12-09/>.

¹⁹³ *Id.*

¹⁹⁴ Susan McCord, “Lincoln County Looks to Eliminate All Polling Places But One,” *Augusta Chronicle*, 21 December, 2021.

¹⁹⁵ Nick Corasanti and Reid J. Epstein, “How States are Expanding Their Control Over Elections,” *New York Times*, 19 June, 2021; Mark Niese and Brad Branch, “Fulton County Elections Takeover Mulled,” 27 July, 2021

Georgia House, for example, none of Georgia's Black House members were elected from a district with more than 55% white voters. In the Georgia Senate, none of Georgia's Black Senators were elected from a district with more than 47% white voters. This trend is not surprising given the historically pervasive racially polarized voting in the state. These figures are shown below:¹⁹⁶

Winning Candidates in 2020 in Georgia House of Representatives

Percentage white registered voters in district	White Republicans ¹⁹⁷	Black Democrats	White Democrats
Under 40%	0	48	7
40–46.2%	1	3	2
46.2–54.9	11	1	6
55–62.4%	23	0	5
Over 62.4%	68	0	0

Winning Candidates in 2020 in Georgia State Senate

Percentage white registered voters in district	White Republicans	Black Democrats	White Democrats
Under 47%	0	16	1
47–54.9%	3	0	3
Over 55%	51	0	0

Black candidates have faced similar difficulties in running for statewide office throughout the South. The three victories of Raphael Warnock, in the 2020 general election, in the 2020 runoff, and in the 2022 general election, are rare instances of a Black candidate winning statewide office.

¹⁹⁶ Lawyers Committee for Civil Rights, *The Central Role of Racial Demographics in Georgia Elections: How Race Affects Elections for the Georgia General Assembly* (May 2021).

¹⁹⁷ There are currently no Black Republicans in the Georgia General Assembly.

According to a recent study (2022) reflected in the table below, from 1989 to 2018 Black success in statewide races in the South is rare:¹⁹⁸

Success of Candidates for Statewide Office in the South, 1989-2018

A. Democrats

Race of candidate	Democrats won %	Democrats Lost	n
White	42.6	57.4	455
Black	15.9	84.1	69
Latino	25	75	16
Total	38.7	63.3	540

B. Republicans

Race of Candidate	Republicans won%	Republicans lost%	n
White	61.4	38.6	526
Black	20	80	5
Latino	77.8	22.2	9
Total	61.3	38.7	540

V. THE RELATIONSHIP BETWEEN RACE AND PARTISANSHIP IN GEORGIA POLITICS

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

Since Reconstruction, conservative whites in Georgia and other southern states have more or less successfully and continuously held onto power. While the second half of the twentieth century was generally marked by a slow transition from conservative white Democrats to conservative white Republicans holding political power, the reality of conservative white political dominance did not change. As discussed below, the Democratic Party's embrace of civil rights

¹⁹⁸ Charles Bullock III, Susan A. McManus, Jeremy D. Mayer, and Mark Rozell, *African American Statewide Candidates in the New South*, (New York: Oxford University Press, 2022), 8, 9. The tables include all of the states of the Old Confederacy except for Louisiana. The volumes cover has photographs of Stacey Abrams and Raphael Warnock.

legislation—and the Republican Party’s opposition to it—was the catalyst of this enduring political transformation.¹⁹⁹

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. In the 1948 presidential election, South Carolina Governor J. Strom Thurmond mounted a third-party challenge against Democratic President Harry Truman in protest of Truman’s support for civil rights, including his integration of the armed forces. Thurmond ran on the so-called Dixiecrat party which claimed the battle flag of the Confederacy for its symbol. Thurmond’s campaign ended Democratic dominance of deep South states by winning South Carolina, Alabama, Mississippi, and Louisiana.²⁰⁰

This trend of white voters in Georgia abandoning the Democratic Party due to its support of civil rights was readily apparent in the 1964 and 1968 presidential elections. In 1964, the Republican nominee, Barry Goldwater, won only six states in a landslide defeat to President Lyndon B. Johnson: his home state of Arizona, and all five states comprising the Deep South (South Carolina, Georgia, Alabama, Mississippi, and Louisiana). In fact, Goldwater was the first Republican presidential candidate to *ever* win Georgia’s electoral votes.²⁰¹ In 1968, Georgia’s electoral votes were won by George Wallace, another third-party presidential candidate who ran on a platform of vociferous opposition to civil rights legislation.²⁰² And other than favorite son Jimmy Carter, no Democratic nominee for President has since won Georgia’s electoral votes until President Joe Biden’s victory in 2020.

¹⁹⁹ Nancy J. Weiss, *Farewell to the Party of Lincoln: Black Politics in the Age of FDR* (Princeton, NJ: Princeton University Press, 1983); Barbara M. Linde, *African Americans in Political Office: From the Civil War to the White House* (New York: Lucent Press, 2015).

²⁰⁰ Joseph Crespino, *Strom Thurmond’s America: A History* (New York: Farrar, Straus and Giroux, 2012); Nadine Cohodas, *Strom Thurmond and The Politics of Southern Change* (Macon: Mercer University Press, 1993); Jack Bass & Marilyn W. Thompson, *Strom: The Complicated Personal and Political Life of Strom Thurmond* (New York: Public Affairs, 2005).

²⁰¹ “1964,” The American Presidency Project, *available at* <https://www.presidency.ucsb.edu/statistics/elections/1964> (last accessed Dec. 5, 2022).

²⁰² “1968,” The American Presidency Project, *available at* <https://www.presidency.ucsb.edu/statistics/elections/1968> (last accessed Dec. 5, 2022).

White southerners abandoned the Democratic Party for the Republican Party because the Republican Party 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.²⁰³ 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.²⁰⁴ Historians and political scientists 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. South Carolinian Harry Dent, who had previously worked for Senator Strom Thurmond, became Nixon’s advisor and helped implement the “Southern strategy.”²⁰⁵ 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 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

²⁰³ Earl Black & 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); Timothy N. Thurber, *Republicans and Race: The GOP’s Frayed Relationship with African Americans, 1945-1974* (2013); Heather Cox Richardson, *To Make Men Free: A History of the Republican Party* (New York: Basic Books, 2021), 10, 11, 321-408, 456-475.

²⁰⁴ 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.

²⁰⁵ David Stout, “Harry Dent, an Architect of Nixon ‘Southern Strategy,’ Dies at 77,” N.Y. Times (Oct. 2, 2007), available at <https://www.nytimes.com/2007/10/02/us/02dent.html>.

traditionally been the solid Democratic South.²⁰⁶ After studying Phillips's plan, Nixon told his staff to implement the strategy and emphasized, "don't go for Jews and Blacks."²⁰⁷

Matthew D. Lassiter, a historian of the Atlanta suburbs, observed that "the law-and-order platform at the center of Nixon's suburban strategy tapped into Middle American resentment toward antiwar demonstrators and black militants but consciously employed a color-blind discourse that deflected charges of racial demagoguery."²⁰⁸ And John Ehrlichman, President Nixon's domestic policy advisor, admitted in 1994 that the war on drugs—a key part of law-and-order campaigns—had an ulterior motive. He observed that "the Nixon campaign in 1968, and the Nixon White House after that, had two enemies: the antiwar left and black people." While the Nixon campaign "couldn't make it illegal to be either against the war or black," they knew that "by getting the public to associate the hippies with marijuana and blacks with heroin, and then criminalizing both heavily, [they] could disrupt those communities."²⁰⁹

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."²¹⁰ Moreover, "In white-majority Georgia,

²⁰⁶ Kevin P. Phillips, *The Emerging Republican Majority* (New York: Arlington House, 1969), 467-68.

²⁰⁷ 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.

²⁰⁸ Matthew D. Lassiter, *The Silent Majority: Suburban Politics in the Sunbelt South* (Princeton, NJ: Princeton University Press, 2006), 234.

²⁰⁹ Dan Baum, "Legalize It All," *Harper's* (April 2016).

²¹⁰ Expert Rep. of Dr. Peyton McCrary at 8, *Fair Fight Action v. Raffensperger*, No. 1:18-cv-05391SCJ, (N.D. Ga. Apr. 24, 2020), ECF No. 339 ("McCrary Report").

Republicans benefitted from a pattern of voting that was polarized along racial lines.”²¹¹ University of Georgia political scientist Charles Bullock noted that “the relationship between race and voting in 2002 was striking.”²¹² 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.”²¹³ 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.²¹⁴

To be sure, Republicans nominated a Black candidate—Herschel Walker, a former University of Georgia football legend—to challenge Senator Raphael Warnock in the 2022 general election for U.S. Senate. But Walker’s nomination only underscores the extent to which race and partisanship remain intertwined. Republican leaders in Georgia admittedly supported Walker because they wanted to “peel[] off a handful of Black voters” and “reassure white swing voters that the party was not racist.”²¹⁵ The strategy failed. Exit polls clearly showed that Warnock remained the candidate of Black voters and Walker was the candidate of white voters.²¹⁶ In fact, Walker’s share of the Black vote was virtually identical to that of Governor Brian Kemp, who was also on the general election ballot in his re-election bid against Stacey Abrams.²¹⁷

	U.S. Senate	Governor
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²¹¹ McCrary Report at 30.

²¹² 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* (New York, Rowman & Littlefield, 5th ed. 2014), 58.

²¹³ Charles S. Bullock III & Ronald Keith Gaddie, *The Triumph of Voting Rights in the South* (Norman, University of Oklahoma Press, 2009), 100.

²¹⁴ Donald E. Farrar & Robert R. Glauber, “Multicollinearity in Regression Analysis: The Problem Revisited,” *Review of Economics and Statistics*, XLIX (February 1967), 92-107, esp. p. 98; Peyton McCrary, Clark Miller, & 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.

²¹⁵ Cleve R. Wootson Jr., “Herschel Walker’s Struggles Show GOP’s Deeper Challenges in Georgia,” *Washington Post* (Sept. 22, 2022), <https://www.washingtonpost.com/politics/2022/09/22/herschel-walker-georgia-black-voters/>

²¹⁶ NBC News, Georgia Senate Exit Polls (Nov. 8, 2022), *available at* https://www.nbcnews.com/politics/2022-elections/georgia-senate-results?icid=election_statenav; NBC News, Georgia Governor Exit Polls, (Nov. 8, 2022), *available at* https://www.nbcnews.com/politics/2022-elections/georgia-governor-results?icid=election_statenav.

²¹⁷ *See supra* n.218.

	WARNOCK (D)	WALKER (R)	ABRAMS (D)	KEMP (R)
Black men	85%	12%	84%	14%
Black women	93%	5%	93%	6%
White men	27%	71%	23%	76%
White women	30%	68%	27%	72%

Similarly, a CNN poll of Black voters, released on Friday, December 2, 2022, found Mr. Walker winning just three percent of Black voters.”²¹⁸ And when New York Times reporters interviewed more than “more than two dozen Black voters across Georgia, many said they did not see Mr. Walker, who has taken a conciliatory approach to matters of race, as representing the interests of Black people.”²¹⁹ The Times reported that “many Black voters disagree with how Mr. Walker,” quoting Black human resources coordinator, Ms. Darca Davis, “views the nation and also other African American people.”²²⁰

It is undeniable that support in Georgia for the Democratic and Republican parties remains profoundly split by race. The 2022 Senate race between Walker and Warnock—two Black men—produced utterly asymmetrical voting patterns among white and Black voters, demonstrating more clearly than any recent election in Georgia’s history the continued salience of race in Georgia elections and how the two parties are intricately defined by race.

B. Racial Appeals in Georgia Politics

Explicit racial appeals in politics are more taboo today 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. The success of the Democratic Party in the South relies crucially on engaging and mobilizing Black voters. Consequently, the modern Republican party has made attacking the Black core of the Democratic Party, especially urban areas where most Black voters live, one of its fundamental strategies.

²¹⁸ Maya King, Clyde McGrady, & Jezmine Ulloa, “In Georgia, a Heated Senate Race Stirs Mixed Emotions in Black Voters,” *N.Y. Times* (Dec. 3, 2022), <https://www.nytimes.com/2022/12/03/us/politics/georgia-senate-runoff-black-voters.html>.

²¹⁹ *Id.*

²²⁰ *Id.*

i. Historical Foundations

Republican political operative Lee Atwater from Georgia's neighbor South Carolina had learned from fellow South Carolinian and Nixon Southern strategist Harry Dent. As Atwater, the Republican campaign aide and strategist who helped George H.W. Bush win election in 1988 by helping to create the infamous "Willie Horton" advertisement, notoriously explained in 1981 that 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."²²¹ 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. Atwater was especially candid in his explanation:

You start out in 1954 by saying, "Nigger, nigger, nigger." By 1968 you can't say "nigger"—that hurts you, backfires. So you say stuff like, uh, forced busing, states' rights, and all that stuff, and you're getting so abstract. Now, you're talking about cutting taxes, and all these things you're talking about are totally economic things and a byproduct of them is, blacks get hurt worse than whites.... "We want to cut this," is much more abstract than even the busing thing, uh, and a hell of a lot more abstract than "Nigger, nigger."²²²

Princeton University Political Scientist Tali Mendelberg defined Atwater's implicit racial appeal as "one that contains a recognizable – if subtle – racial reference, most easily through visual references."²²³ Ian Haney Lopez, the Chief Justice Earl Warren Professor of Public Law at Berkeley Law, University of California, 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.²²⁴ Implicit racial

²²¹ Peter Baker, "Bush Made Willie Horton an Issue in 1988, and the Racial Scars Are Still Fresh," N.Y. Times (Dec. 3, 2018), <https://www.nytimes.com/2018/12/03/us/politics/bush-willie-horton.html>; Rick Perlstein, "Exclusive: Lee Atwater's Infamous 1981 Interview on the Southern Strategy," *The Nation* (Nov. 13, 2012), <http://www.thenation.com/article/170841/exclusive-lee-atwaters-infamous-1981-interview-southern-strategy>.

²²² Rick Perlstein, "Exclusive: Lee Atwater's Infamous 1981 Interview on the Southern Strategy," *The Nation* (Nov. 13, 2012), <http://www.thenation.com/article/170841/exclusive-lee-atwaters-infamous-1981-interview-southern-strategy>.

²²³ Tali Mendelberg, *The Race Card: Campaign Strategy, Implicit Messages, and the Norm of Equality* (Princeton, N.J.: Princeton University Press, 2001), 9, 11.

²²⁴ Lopez, *Dog Whistle Politics*, 130, 4.

appeals make use of coded language to activate racial thinking.²²⁵ Racial cues, in the form of code words, such as “welfare queen,” “lazy,” “criminal,” “taking advantage,” “corruption,” “fraud,” “voter fraud,” and “law and order” are racial code words that refer back to Reconstruction era when African Americans were first elected to office. Other coded issues, such as “poverty” and “immigration,” prime racial attitudes among white voters.

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.”²²⁶ 22% of Democrats ultimately supported Regan in 1980, but those defections were substantially higher among Democrats with racially conservative views.²²⁷ 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.²²⁸

Similarly, in the 1988 campaign, Republican candidate George H.W. Bush associated Democratic candidate Governor Michael Dukakis with Willie Horton, an African American 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 murderers to roam the streets. This appeal to the racial fears contributed to Bush’s victory in 1988.²²⁹

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

²²⁵ 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.

²²⁶ Ian Haney-Lopez, “The Racism at the Heart of the Reagan Presidency,” Salon (Jan. 11, 2014), *available at* https://www.salon.com/2014/01/11/the_racism_at_the_heart_of_the_reagan_presidency/.

²²⁷ *Id.*

²²⁸ *Id.*

²²⁹ 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.

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.²³⁰ And the person who perhaps more than anyone else helped steer the Republican Party to this new form of race baiting was Georgia politician Newt Gingrich, who was first elected to Congress from a suburban Atlanta district in 1978 and became the Republican speaker of the U.S. House of Representatives in 1994.

The title of former Emory University history professor Dan T. Carter’s study of race and politics illustrates the trajectory of race appeals: *From George Wallace to Newt Gingrich: Race in the Conservative Counterrevolution, 1963-1994*.²³¹ For Dr. Carter, Wallace is the key figure in the modern use of code words and racist language. But Gingrich is, in the words of Dana Milbank, the “architect of our [current political] dysfunction.”²³² Gingrich ran against Virginia Shephard, a white Democrat, during his first campaign in 1978. He distributed a flyer showing his opponent in a photo with Black Georgia representative Julian Bond which read:

If you like welfare cheaters, you’ll love Virginia Shephard. In 1976, Virginia Shephard voted to table a bill to cut down on welfare cheaters. People like Mrs. Shephard, who was a welfare worker for five years, and Julian Bond fought together to kill the bill.²³³

One of Gingrich’s campaign aides later said “we went after every rural southern prejudice we could think of.”²³⁴ Gingrich’s first act after being elected to Congress was to call for the expulsion of Democrat Charles Diggs from Detroit, the first Black member of Congress elected from an urban district in Michigan, who had diverted \$6,000 in funds from his congressional payroll for his personal use—even though similar infractions by white legislators had not previously resulted

²³⁰ Matthew D. Lassiter, *The Silent Majority: Suburban Politics in the Sunbelt South* (Princeton, N.J.: Princeton University Press, 2006), 234.

²³¹ Dan T. Carter, *From George Wallace to Newt Gingrich: Race in the Conservative Counterrevolution, 1963-1994* (Baton Rouge: Louisiana State University Press, 1996)

²³² Dana Milbank, *The Destructionists: The Twenty-Five-Year Crack-Up of the Republican Party* (New York: Doubleday, 2022), 49; see also Julian E. Zelizer, *Burning Down the House: Newt Gingrich, The Fall of a Speaker, and the Rise of the New Republican Party* (New York: Penguin, 2020).

²³³ Milbank, *The Destructionists*, 66.

²³⁴ *Id.*

in expulsion. Gingrich led the successful campaign for Representative Diggs' expulsion, though he was subsequently re-elected.²³⁵ According to Dana Milbank:

Gingrich claimed to be racially progressive (he favored a Martin Luther King Jr. federal holiday), but was proficient in racist dog whistles, railing against the “corrupt, liberal welfare state,” drafting a Republican platform in Georgia warning that “America is in danger of decaying into a jungle of violent crimes,” saying that because of civil rights leader Jesse Jackson “it’s going to be a Dukakis-Jackson administration no matter who the vice presidential nominee is.” He argued for branding Democrats with the words “welfare” and “criminal rights.” He claimed that “it is in the interest of the Republican Party...[ellipsis in original] to invent new Black leaders, so to speak—people who have a belief in discipline, hard work, and patriotism. He decried “multicultural nihilistic hedonism.” He fought civil rights groups in trying to add a new category, “multi-cultural to the census. When Gingrich’s Republicans won the House in 1994, it was in large part because for the first time since Reconstruction, Democrats had lost their southern majority in Congress.”²³⁶

Racism, whether dog whistled or communicated directly, became a hallmark of the Gingrich Republican Party. Georgia Republican congressman Bob Barr, in the 1990s addressed the Council of Conservative Citizens, a descendant of the White Citizens Council.²³⁷ Radio commentator Rush Limbaugh said at one point that “if any race of people should not have guilt over slavery, it’s Caucasians.”²³⁸ Gingrich himself remains active in Georgia politics, campaigning for Trump-backed candidates in the 2022 election cycle, opining that Kamala Harris “is the dumbest vice president ever,” while reinforcing stereotypes while challenging them, arguing that Republican African American Senate candidate Herschel Walker “is dramatically smarter than people think he is.”²³⁹

²³⁵ *Id.*

²³⁶ *Id.* at 66–67.

²³⁷ *Id.* at 68.

²³⁸ *Id.*

²³⁹ Shannon McCaffrey, “Back in Georgia, Newt Gingrich looks to make his mark on 2022 election,” *Atlanta Journal Constitution* (May 28, 2022), <https://www.ajc.com/politics/election/back-in-georgia-newt-gingrich-looks-to-make-his-mark-on-2022-election/HFSZFXCZFRDKZB4CLVAJTE427I/>.

ii. Modern Examples

a. 2018 Gubernatorial Race

Racist appeals have continued to characterize Georgia elections and reached a crescendo in 2018 when Stacey Abrams, the Democratic minority leader in the Georgia House of Representatives, challenged Brian Kemp, the Republican Secretary of State, in the 2018 race for Governor. Kemp's efforts and successes to limit Black voting strength by striking voters, especially minority voters from the voting rolls are discussed elsewhere in this report. *See supra* Part IV.I. Kemp justified this disfranchisement by claiming that he was defending the integrity of the vote against "radical leftists," "outside agitators," and "criminal illegals" who were invading the state in large numbers. He claimed that Abrams was encouraging "illegals"—which for Kemp included both documented and undocumented immigrants. He told Georgia voters, echoing Donald Trump, that "we can build a wall—a big, red, beautiful wall—around the state of Georgia to knock that blue wave down."²⁴⁰

Kemp also circulated on social media a photograph of a few members of the New Black Panther Party, considered a hate group by the Southern Poverty Law Center, attending an Abrams rally with guns. Although Abrams condemned the New Black Panther Party, Kemp circulated the photo on Facebook with the accompanying message: "The New Black Panther Party is a virulently racist and antisemitic organization whose leaders have encouraged violence against whites, Jews, and police officers. SHARE if you agree that Abrams and the Black Panthers are TOO EXTREME for Georgia!"²⁴¹ The post spread quickly through right-wing media.²⁴² As one media commentator later noted, "[i]t was too easy for Brian Kemp's last-minute dog whistle about Stacey Abrams to go viral."²⁴³

²⁴⁰ Carol Anderson, *One Person, One Vote: How Voter Suppression is Destroying Our Democracy* (New York: Bloomsbury Publishing, 2020), 173.

²⁴¹ April Glaser, "It Was Too Easy for Brian Kemp's Last-Minute Dog Whistle About Stacey Abrams To Go Viral," *Slate* (Nov. 6, 2018), <https://slate.com/technology/2018/11/brian-kemp-stacey-abrams-dog-whistle-black-panthers-facebook.html>.

²⁴² *See* Penny Starr, *Armed Black Panthers Lobby for Democrat Gubernatorial Candidate Stacey Abrams*, *Breitbart* (Nov. 4, 2018), *available at* https://www.breitbart.com/politics/2018/11/04/armed-black-panthers-lobby-for-democrat-gubernatorial-candidate-stacey-abrams/?utm_source=wnd&utm_medium=wnd&utm_campaign=syndicated.

²⁴³ April Glaser, "It Was Too Easy for Brian Kemp's Last-Minute Dog Whistle About Stacey Abrams To Go Viral," *supra* n.241.

Abrams was attacked with even more overtly racist appeals from third parties. For example, a robo-call created by a fringe right-wing group circulated in the Atlanta suburbs before the election. The speaker in the robo-call imitated Oprah Winfrey and stated:

“This is the magical Negro, Oprah Winfrey, asking you to make my fellow Negro, Stacey Abrams, governor of Georgia. Yes, also the Jews who own the American media saw something in me—the ability to trick dumb white women to think like me. And to do, read, and think what I told them to do.... I see that same potential in Stacey Abrams. Where others see a poor man’s Aunt Jemima, I see someone that white women can be tricked into voting for—especially the fat ones.”²⁴⁴

The FCC later called for a \$12 million fine against the originator of the racist robo-calls.²⁴⁵ As one commentator noted after the 2018 election, “racist appeals didn’t hurt” the candidates making them in Georgia and throughout the South, and actually “did help them.”²⁴⁶

b. 2020 U.S. Senate Race

Racial appeals were also evident in the 2020 U.S. Senate race. Democrats nominated Raphael Warnock, a Black minister preaching from the same pulpit Martin Luther King Jr. once occupied at Ebenezer Baptist Church, attempting to be the first Black senator from the state of Georgia. Warnock faced racist attacks throughout the 2020 campaign, often through “dog whistle” attacks that did not explicitly focus on Warnock’s race as explained above.

Warnock’s opponent in the general election was then-Senator Kelly Loeffler. Loeffler attacked Warnock repeatedly as a “radical liberal” and characterized his sermons delivered at Ebenezer Baptist Church as un-Christian. Congressman Doug Collins, who was defeated by Loeffler defeated in the Republican primary but later supported her in the general election, said that “there is no such thing as a pro-choice pastor. What you have is a lie from the bed of hell. It is time to send *it* back to Ebenezer Baptist Church,” referring to Warnock as an “it” and Ebenezer

²⁴⁴ Madison Feller, “A Racist, Anti-Semitic Robo-Call Targeting Stacey Abrams is Going Out to Georgia Voters,” *Elle* (Nov. 6, 2018), <https://www.elle.com/culture/career-politics/a24662570/robo-call-georgia-voters-targeting-stacey-abrams-racist/>.

²⁴⁵ Mark Niesse, “Racist robocalls attacking Stacey Abrams lead to proposed fines,” *Atlanta Journal Constitution* (Jan. 31, 2020), <https://www.ajc.com/news/state--regional-govt--politics/racist-robocalls-attacking-stacey-abrams-lead-proposed-fines/3gqUT9zGxqKkHCN1XtInVN/>.

²⁴⁶ Jarvis De Berry, “The Dirty South: Racist Appeals Didn’t Hurt Candidates, Did Help Them,” *Nola* (Nov. 17, 2018), https://www.nola.com/opinions/article_2affbc92-aaf4-5c6c-88d6-9fe1db466492.html

Baptist Church as satanic.²⁴⁷ This line of attack crossed a line and exposed the “fragile relationship that Georgia Republicans have maintained with Ebenezer Baptist Church, and by extension, the King family.”²⁴⁸ Loeffler claimed in response that “there is not a racist bone in my body.”²⁴⁹

Leaving the question of her bones aside, Loeffler was supported by a number of prominent racists and white nationalists. She was photographed with Chester Doles, a former “Grand Klaliff” of the Ku Klux Klan in North Georgia and a member of the neo-Nazi National Alliance,²⁵⁰ and did an interview on the One America News Channel with Jack Posobiec, “a TV pundit associated with white supremacy and Nazism.”²⁵¹ Senator Loeffler also received the enthusiastic support of the newly elected congresswoman from North Georgia Marjorie Taylor Green, who had recorded a number of videos which stated, among other things, that Black people’s progress is hindered by African American gang activity, drugs, lack of education, Planned Parenthood, and abortions.²⁵² Warnock also faced blatant racist attacks on the campaign trail. For example, one of his virtual town hall meetings was interrupted by hecklers who were “chanting the N-word” in an attempt to shut down the virtual event.²⁵³

²⁴⁷ Rick Rojas, “Georgia Pastors See Attacks on Black Church in Campaign Against Warnock,” N.Y. Times (Dec. 19, 2020), <https://www.nytimes.com/2020/12/19/us/georgia-pastors-see-attack-on-black-church-in-campaign-against-warnock.html>.

²⁴⁸ Jim Galloway, “Taking Senator Kelly Loeffler to Church,” *Atlanta Journal-Constitution* (Dec. 1, 2020), <https://www.ajc.com/politics/politics-blog/opinion-the-kelly-loeffler-raphael-warnock-runoff-crosses-a-line/Z7YGGZ4MBOFFNJHKBBIJT6SHJM/>.

²⁴⁹ Rick Rojas, “Georgia Pastors See Attacks on Black Church in Campaign Against Warnock,” N.Y. Times, *supra* n.247.

²⁵⁰ “Loeffler campaign: She had ‘no idea’ she posed with neo-Nazi,” Associated Press (Dec. 13, 2020), *available at* <https://apnews.com/article/race-and-ethnicity-georgia-media-social-media-elections-99c40bece8a6fc6904647727493f1257>.

²⁵¹ Leon Stafford, “Warnock Tests Loeffler’s View That She’s Not Racist,” *Atlanta Journal Constitution* (Dec. 22, 2020), <https://www.ajc.com/politics/senate-watch/campaign-check-warnock-tests-loefflers-view-that-shes-not-racist/SOWX3GL3ARDJNBFDWWZYQ75BVM/>.

²⁵² Ally Mutnick & Melanie Zanora, “House Republican Leaders Condemn GOP Candidate Who Made Racist Videos,” Politico (June 17, 2020), <https://www.politico.com/news/2020/06/17/house-republicans-condemn-gop-candidate-racist-videos-325579>; Greg Bluestein, “QAnon Believer’s Victory a Mixed Blessing for GOP,” *Atlanta Journal Constitution*, Aug. 13, 2020, at A1.

²⁵³ Jason Braverman, “Town Hall with Georgia US Senate Candidate Allegedly Interrupted With Racist Attacks, Pornography,” *11 Alive* (Aug. 25, 2022), <https://www.11alive.com/article/news/politics/elections/virtual-town-hall-with-democratic-us-senate-candidate-hacked-with-racist-attacks-pornography/85-ba6f9c4d-b55f-4465-8a15-5d1d856cd8f7>.

c. 2022 Gubernatorial Race

Racial appeals dominated Stacey Abrams's second run for Governor in 2022. Governor Kemp faced a primary challenge from former Senator David Perdue, who attempted to win over Republican primary voters through racist attacks against Abrams. Perdue said in a televised interview that Abrams was "demeaning her own race" and should "go back where she came from."²⁵⁴ Kemp, who eventually defeated Perdue, repeatedly attacked Abrams in the general election as "upset and mad," evoking the trope and dog whistle of the "angry Black woman."²⁵⁵ Moreover, Kemp's campaign deliberately darkened Abrams's face in campaign advertisements in an effort to create a darker, more menacing image.²⁵⁶

As was true in the 2018 campaign, Abrams faced repeated racist attacks from third parties. After Stacy Abrams planned a campaign rally in Forsythe County, in suburban Atlanta, the Republican Party of Forsythe County issued a digital flyer that was "a 'call to action' encouraging 'conservatives and patriots' to 'save and protect our neighborhoods,'" and accused both Abrams and Senator Warnock of being "designers of destructive socialism" that would be "crossing over our county border."²⁵⁷ The flier carried echoes of the infamous pogrom in Forsythe County in 1912, when most of the Black people in the county were forcibly expelled.²⁵⁸

d. "Voter Fraud" and "Fulton County"

The use of "coded terms" has been a common racial appeal across elections in Georgia. And among "coded terms" in modern politics, probably none has the racial salience of "voter fraud." Although accusations of minority voter fraud were a major theme in the efforts of

²⁵⁴ Ewan Palmer, "David Perdue Doubles Down on 'Racist' Stacey Abrams Remarks in TV Interview," *Newsweek*, (May 24, 2022), <https://www.newsweek.com/david-perdue-racist-stacey-abrams-go-back-georgia-1709429>.

²⁵⁵ Abby Vesoulis, "Did Brian Kemp Employ a Dog Whistle During His Campaign Against Stacey Abrams?," *Mother Jones* (Oct. 18, 2022), <https://www.motherjones.com/politics/2022/10/Georgia-debate-governor-abrams-kemp/>.

²⁵⁶ Doug Richards, "Darkened Skin in Anti-Abrams Ad Racially Charged, 'Pernicious,' Political Analysts Say," *11 Alive* (Sept. 30, 2022), <https://www.11alive.com/article/news/politics/darkened-skin-in-georgia-political-ads-2022/85-3ff31b49-c451-4af8-8033-fd732fe787ae>.

²⁵⁷ Maya King, "In Georgia County With Racist History, Flier Paints Abrams as Invading Enemy," *N.Y. Times* (Sept. 16, 2022), <https://www.nytimes.com/2022/09/16/us/politics/stacey-abrams-forsyth-georgia-republicans.html>.

²⁵⁸ See Patrick Phillips, *Blood at the Root: A Racial Cleansing in America* (New York: Norton, 2016).

conservative whites during and after Reconstruction to restrict and eliminate Black suffrage, the phrase “voter fraud” is a relatively recent addition to America’s toxic racial vocabulary. In the 1960s, the heyday of the civil rights movement, the phrase “voter fraud” appeared precisely twice in the pages of the *New York Times*, and in the four decades from 1960 to 1999 it appeared 185 times. From 2015 through April 2022, the phrase “voter fraud” appeared in the pages of the *New York Times* 1,526 times.²⁵⁹

At the national level, a turning point in the recent history of “voter fraud” accusations was the 2000 presidential election in Florida and its razor-thin margins. Beyond the obvious post-election turmoil related to recounts, 180,000 ballots, close to 3% of the total votes cast, failed to be counted in Florida, and subsequent analysis showed that election officials discarded one in ten votes cast by Black voters as opposed to less than one in fifty votes cast by whites. Various methods used by election officials in counting ambiguous ballots, as well as the purging of allegedly disenfranchised felons, which included many persons eligible to vote, were consequential to the results of the election and in the end, likely cost Democratic presidential candidate Al Gore more than fifty thousand votes.²⁶⁰ The racial disparity in the Florida recount is, in the opinion of historian Allan Lichtman, “the great underreported scandal of the twenty-first century,” as the general public, following news coverage, tended to blame faulty ballot design, the notorious “hanging chads” and butterfly ballots, rather than the systematic disenfranchisement of Black voters.²⁶¹

Underreported it may be, but Republicans learned an important lesson from the Florida fight—claiming that Democratic officials engaged in voter fraud and disenfranchising as many likely Democratic voters as possible can be a valuable tool in creating chaos and winning elections. As voting law expert Richard L. Hasen stated, “before 2000, there were some rumblings about

²⁵⁹ These figures are drawn from the ProQuest data base, “Historical Newspapers: The New York Times” through the end of 2018, and the search feature for the daily *New York Times* from 2019 through 2 April 2022. The term “vote fraud” has an older history, but in recent years it has largely been supplanted, in the *New York Times* and other newspapers, by “voter fraud.” If there is a difference between the two phrases, vote fraud need not be committed by voters—for instance, corrupt officials can either stuff or conveniently lose ballot boxes, or, more recently used advanced technology to manipulate voting totals. “Voter fraud” on the other hand, implies the illegal action is directly taken by voters.

²⁶⁰ Allan J. Lichtman, *The Embattled Vote in America: From the Founding to the Present* 181–186 (2020)

²⁶¹ *Id.*

Democratic voter fraud, but it really wasn't part of the main discourse."²⁶² Afterwards, "the myth that Democratic voter fraud is common, and that it helps Democrats win election, has become part of the Republican orthodoxy."²⁶³ But perhaps more importantly, reference to fraud has become a racial code word for minority and Black voters. Or in the words of Emory University Professor Carol Anderson, the real lesson of 2000 for Republicans was to do whatever it takes to limit the growing demographic presence of racial minorities among voters, that "those who controlled the key levers of the electoral and political machinery could give purges, bureaucratic runarounds, and other types of chicanery the aura of legality," and above all lie about election fraud.²⁶⁴ And lie "often, loudly, boldly, unashamedly, and consistently," until lies "drowned out the truth."²⁶⁵ Those lies have only become noisier and more brazen since 2000.

These parallel historical narratives about election integrity and voter fraud (false tropes from the excuses for overthrowing the interracial democratically elected governments from Reconstruction era), racial dynamics in Georgia, and coded discussions about the interaction between those two ideas all came to a head during the Trump presidency. Accusations of electoral malfeasance was a staple of Donald Trump's campaigns. Following the Iowa caucuses in February 2016, for example, Trump finished second to Texas Senator Ted Cruz. Calling for the caucus results to be nullified and for a new election, he claimed "Ted Cruz didn't win Iowa, he stole it."²⁶⁶

Trump proceeded to regularly assert during campaign appearances that "the election is going to be rigged," and cast aspersions on urban voters.²⁶⁷ He claimed without any evidence that without strict in-person voter ID laws, there will be people who will "vote ten times," and "keep

²⁶² Cited in Ari Rabin-Haut and Media Matters for America, *Lies, Incorporated: The World of Post-Truth Politics* (New York: Anchor Books, 2016), 135.

²⁶³ Jane Meyer, "The Voter Fraud Myth," *The New Yorker* (Oct. 22, 2012), <https://www.newyorker.com/magazine/2012/10/29/the-voter-fraud-myth>.

²⁶⁴ Carol Anderson, *One Person, No Vote: How Voter Suppression is Destroying Our Democracy* (New York: Bloomsbury, 2018), 50.

²⁶⁵ *Id.* at 60–62; Ari Berman, *Give Us the Ballot: The Modern Struggle for Voting Rights in America* (New York: Picador, 2015) 222–224, 226–229; Stacey Abrams, *Our Time is Now: Power, Purpose, and the Fight for a Fair America* (Henry Holt, 2020), 75–76.

²⁶⁶ Amy Tennery, "Trump Accuses Cruz of Stealing Iowa Caucuses Through Fraud," *Reuters* (Feb. 3, 2016), available at <https://www.reuters.com/article/us-usa-election-trump-cruz/trump-accuses-cruz-of-stealing-iowa-caucuses-through-fraud-idUSMTZSAPEC23ZBL9YS>.

²⁶⁷ Jonathan Blitzer, "Trump and the Truth: The 'Rigged' Election," *The New Yorkers* (Oct. 8, 2016), available at <https://www.newyorker.com/news/news-desk/trump-and-the-truth-the-rigged-election>.

voting and voting and voting.”²⁶⁸ He also suggested that voter fraud would come from cities with large African American and minority populations. In October 2016, for example, candidate Trump said that “voter fraud is all too common, take a look at Philadelphia, what’s been going on, take a look at Chicago, take a look at St. Louis,” and said what was happening in those cities was “horrendous.”²⁶⁹ That fall, Trump told an almost all-white crowd outside Pittsburgh that it was “so important that you watch other communities, because we won’t have this election stolen from us.”²⁷⁰ He also complained that undocumented immigrants, most of whom were persons of color, would be used to defraud the election, and that President Obama was “letting people pour into the country so they can vote.”²⁷¹

Donald Trump later brought these racial appeals to Georgia by using references to “Fulton County” as coded language. As part of his effort to overturn the 2020 election results in Georgia, Trump called Georgia Secretary of State Brad Raffensperger and told him that “political corruption” in Fulton County was “rampant” and that many Republican votes in Fulton County were shredded, along with other baseless conspiracy theories.²⁷² Trump’s campaign later 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.²⁷³ Although the accusations were utter nonsense, former President Trump told Secretary Raffensperger that Ruby Freeman was a “professional vote scammer and hustler.”²⁷⁴ 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

²⁶⁸ *Id.*

²⁶⁹ *Id.*

²⁷⁰ *Id.*

²⁷¹ *Id.*

²⁷² Quinn Scanlan, “Trump ‘Just Plain Wrong’ on Fraud Claims: Georgia Secretary of State Raffensperger,” ABC News (Jan. 4, 2021), *available at* <https://abcnews.go.com/Politics/trump-plain-wrong-fraud-claims-georgia-secretary-state/story?id=75032595>.

²⁷³ Jason Szep and Linda So, “Trump Campaign Demonized Two Georgia Election Workers—And Death Threats Followed,” Reuters, (Dec. 1 2021), <https://www.reuters.com/investigates/special-report/usa-election-threats-georgia/> (emphasis added).

²⁷⁴ *Id.*

from the nearest lamppost and set on fire,” horribly echoing the calls for lynchings of Black citizens from earlier years who were attempting to participate in the political process.²⁷⁵ As discussed above, the intense focus on Fulton County is not random—reference to this large, urban, majority-minority county in Georgia has been used as a coded racial appeal in the election context.

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 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.”²⁷⁶

C. 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%).

²⁷⁵ *Id.*

²⁷⁶ Mark Niese, “Board Launches Fulton County Election Woes Inquiry,” *Atlanta Journal Constitution* (Aug. 19, 2021), <https://www.ajc.com/politics/panel-appointed-to-investigate-fulton-election-problems/IBRJTD4ERAP7HRIFZ7D243JAA/>.

Pro-Civil Rights Votes Among Georgia's Congressional Delegation, 2017-2019 Congressional Session ²⁷⁷			
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.²⁷⁸ Among the four Republican groupings [Faith and Flag Conservatives (85% white), 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."²⁷⁹ 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.²⁸⁰ Among the four Democratic leaning groups, there was

²⁷⁷ Nat'l Ass'n for the Advancement of Colored People, "NAACP Civil Rights Federal Legislative Report Card, Congressional Votes 2017-2018" (Feb. 1, 2019), <https://naacp.org/sites/default/files/documents/115th-Final-Report-Card.pdf>.

²⁷⁸ Pew Research Center, *Beyond Red and Blue: The Political Typology*, (Nov. 9, 2021), <https://www.pewresearch.org/politics/2021/11/09/beyond-red-vs-blue-the-political-typology-2/>.

²⁷⁹ *Id.* at 7.

²⁸⁰ *Id.* at 14.

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.”²⁸¹

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. Among voters who believed that racism was the most important issue facing the country, 78% voted for Joe Biden and 20% voted for Donald Trump. Among voters who believed that racism was “not too or not at all serious,” 9% voted for Biden and 90% voted for Trump. And among voters who believe that racism is a serious problem in policing, 65% voted for Biden and 33% voted for Trump.²⁸²

C. Conclusion

As this report has shown, Georgia has worked for decades to diminish the voting power of Black Georgians, both at the structural electoral level (in terms of redistricting and electoral arrangements), and at the individual level (in terms of voter requirements). These efforts have often been successful, stymying Georgia’s Black voters from exercising their full political power. It is my opinion that Georgia’s newest congressional plan is best viewed with this historical context.

Moreover, 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 voters and white voters along partisan lines, and they continue to contribute to the partisan divisions we see today.

APPENDIX A: Representative Discriminatory Voting Tactics

Voting Mechanism Adoption	Name of Georgia Jurisdiction	Details
Majority voting requirement	Americus (city)	Adopted plurality to majority vote for mayor and city council in 1968

²⁸¹ *Id.* at 29

²⁸² A.P. VoteCast, “Georgia Voter Surveys: How Different Groups Voted,” N.Y. Times, (Nov. 3 2020), <https://www.nytimes.com/interactive/2020/11/03/us/elections/ap-polls-georgia.html>.

	Jackson (city)	Adopted majority vote after passage of VRA, enjoined in 1981
	Covington (city)	Adopted a majority vote and runoff election requirement for city council in 1967
	St. Mary's (city)	Adopted majority vote requirement for city council in 1967
	Waynesboro (city)	Adopted a majority vote requirement in 1971, ignored §5 finding against the city until 1976
	Moultrie (city)	Adopted majority vote requirement for city council in 1965; used at-large elections
	Augusta, Alapaha, Ashburn, Athens, Butler, Cairo, Camilla, Crawfordville, East Dublin, Hartwell, Hinesville, Hogansville, Jesup, Jonesboro, Lakeland, Louisville, Lumber City, Madison, Nashville, Newman, Palmetto, Sandersville, Sylvester, Thomson, Wadley, Waynesboro, Wrens	Other cities in Georgia that adopted majority vote requirements after 1970
At-Large Voting	Dooly County	Utilized at-large voting from 1967 to 1981
	Miller County	Utilized at-large voting from 1967 to 1980
	Pike County	Utilized at-large voting from 1967 to 1980. No preclearance

		was sought. In 1979, the US AG said preclearance was necessary, but county refused to honor this until a subsequent lawsuit in 1980.
	Harris County	Utilized at-large voting for board of commissioners starting in 1974
	Sumter County	Utilized at-large voting for county commissioners in 1972 following Section 5 finding that the county was malapportioned. In 1981 a three-judge federal panel found that this required preclearance.
	Jackson (city)	Utilized at-large voting following passage of Voting Rights Act; Annexed several dozen areas to suppress Black voting; enjoined by federal court in 1981
	Burke County	Utilized at-large voting until 1976, until enjoined by a federal court in 1981
	Putnam County	Utilized at-large voting until 1981
	McDuffie County	Utilized at-large voting until a 1978 consent decree .
	Coffee County	Utilized at-large voting until a 1977 consent decree .

	Douglas County	Utilized at-large voting until a 1977 consent decree.
	Peach County	Utilized at-large voting until a 1979 consent decree .
	Waynesboro (city)	Utilized at-large voting until a 1977 consent decree.
	Americus (city)	Utilized at-large voting until a 1980 consent decree.
	Dawson County	Utilized at-large voting until a 1980 consent decree.
	Madison County	Utilized at-large voting until a 1978 consent decree.
	Morgan, Newton, and Twiggs Counties	Adopted at-large voting in 1971
	Wilkes, McDuffie Counties	Adopted at-large voting in 1972
	Newton and Bibb Counties	Adopted at-large voting for Board of Education in 1971
	Baldwin, Truetlen, McDuffie, Camden, Putnam, Pike, Spalding, and Wilkes Counties	Adopted at-large voting for Board of Education in 1972
	Toombs, Sumter, and Clarke Counties	Adopted at-large voting for Board of Education in 1973
	Harris, Charlton, and Taylor Counties	Adopted at-large voting for Board of Education in 1975
	Long County	Adopted at-large voting for Board of Education in 1975
Numbered Post System	Dawson (city)	Adopted numbered-post system in 1970
	Kingsland (city)	Adopted numbered-post system in 1967

Other tactics	DeKalb County	Limited minority voting registration drives in 1980
	Seminole County	Used voting districts drawn in 1933 (which severely diluted Black voting strength) up until 1980.
	Camden County	Designated an all-white women's club as the new municipal polling place in 1978
	Peach County	Adopted staggered voting for County Commissioners in 1968
	Moultrie (city)	Instituted a literacy test for new Black poll workers but grandfathering in all previously serving all-white poll workers in 1978.

Source: Laughlin McDonald, *Voting Rights in the South: Ten Years of Challenging Continuing Discrimination Against Minorities* (ACLU, Southern Regional Office, 1982); Laughlin McDonald, *A Voting Rights Odyssey: Black Enfranchisement in Georgia* (Cambridge: Cambridge University Press, 2003), 141–143.

EXHIBIT 5

Expert Report of Dr. Loren Collingwood

Pendergrass v. Raffensperger, No. 1:21-CV-05339-SCJ (N.D. Ga.)

December 12, 2022

Loren Collingwood

Background and Qualifications

I am an associate professor of political science at the University of New Mexico. Previously, I was an associate professor of political science and co-director of civic engagement at the Center for Social Innovation at the University of California, Riverside. I have published two books with *Oxford University Press*, 39 peer-reviewed journal articles, and nearly a dozen book chapters focusing on sanctuary cities, race/ethnic politics, election administration, and racially polarized voting. I received a Ph.D. in political science with a concentration in political methodology and applied statistics from the University of Washington in 2012 and a B.A. in psychology from the California State University, Chico, in 2002. I have attached my curriculum vitae, which includes an up-to-date list of publications.

In between my B.A. and Ph.D., I spent 3-4 years working in private consulting for the survey research firm Greenberg Quinlan Rosner Research in Washington, D.C. I also founded the research firm Collingwood Research, which focuses primarily on the statistical and demographic analysis of political data for a wide array of clients, and lead redistricting and map-drawing and demographic analysis for the Inland Empire Funding Alliance in Southern California. I am the redistricting consultant for the West Contra Costa Unified School District, California, independent redistricting commission, in which I am charged with drawing court-ordered single-member districts.

I have served as an expert witness in a number of cases related to redistricting. I testified for the plaintiff in the Voting Rights Act (VRA) Section 2 case *NAACP v. East Ramapo Central School District*, No. 17 Civ. 8943 (S.D.N.Y.), on which I worked from 2018 to 2020. In that case, I used the statistical software eiCompare and WRU to implement Bayesian Improved Surname Geocoding (BISG) to identify the racial/ethnic demographics of voters and estimate candidate preference by race using ecological data. I was also the racially polarized voting (RPV) expert in several cases during this redistricting cycle: *East St. Louis Branch NAACP v. Illinois State Board of Elections*, No. 1:21-cv-05512 (N.D. Ill.), having filed two reports and sat for a deposition; *Johnson v. Wisconsin Elections Commission*, No. 2021AP1450-OA (Wis.), having filed three reports; *Rivera v. Schwab*, No. 2022-CV-000089 (Kan. Dist. Ct.), having filed a report, sat for a deposition, and testified at trial; *LULAC v. Abbott*, No. 3:21-CV-00259-DCG-JES-JVB (W.D. Tex.), having filed three reports and sat for a deposition; *Walen v. Burgum*, No. 1:22-cv-00031-PDW-CRH (D.N.D.), having filed a report and testified at trial; and *Soto Palmer v. Hobbs*, No. 3:22-cv-05035-RSL (W.D. Wash.), having filed a report.

I have also served as an expert witness in other cases related to voting rights more generally. I am the quantitative expert in *LULAC of Iowa v. Pate*, No. CVCV061476 (Iowa Dist. Ct.), and have filed an expert report in that case. I am the BISG expert in *LULAC Texas v. Scott*, No. 1:21-cv-00786-XR (W.D. Tex.), and have filed two reports and been deposed in that case. I am also the RPV expert in *Lower Brule Sioux Tribe v. Lyman County*, No. 3:22-CV-03008-RAL (D.S.D.), where I filed a report and testified at trial.

I am being compensated at a rate of \$400/hour. No part of my compensation is dependent upon the conclusions that I reach or the opinions that I offer.

Executive Summary

- On every metric, Black Georgians are disadvantaged socioeconomically relative to non-Hispanic white Georgians. Blacks are worse off than whites on the following measures: income, unemployment, poverty, health, and educational attainment.
- These socioeconomic disparities have an adverse effect on the ability of Black Georgians to participate in the political process, as measured by voter turnout and other forms of political participation.
- This means that the political system does not respond to Black Georgians in the same way it responds to white Georgians. If the system did respond, we would expect to see fewer gaps in both health and economic indicators and a reduction in voter turnout gaps.
- Instead, Black Georgians vote at significantly lower rates than white Georgians. That is true at the statewide, county, and precinct levels—including in the Atlanta-Sandy Springs-Alpharetta Metropolitan area. This is also true in the Black Belt region of Georgia.
- The data show a significant relationship between turnout and disparities in health, employment, and education: as health, education, and employment outcomes increase, so does voter turnout in a material way.
- Black Georgians also lag behind white Georgians in other forms of political participation, like making campaign contributions, engaging local officials, and running for office.
- The academic literature overwhelmingly shows that these low levels of political participation are attributable to the socioeconomic disparities discussed above.

My opinions are based on the following data sources: the American Community Survey (ACS) across time; 2020 and 2022 statewide-, county-, and precinct-level voter registration and aggregate turnout data from the Georgia Secretary of State; 2010-2022 statewide voter turnout from the Georgia Secretary of State; 2014-2022 county-level voter turnout data from the Georgia Secretary of State; and the 2020 Cooperative Election Study.

Analysis

A. Senate Factor 5

I have been asked to examine item 5 of what has come to be known as the Senate Factors. During the 1982 Voting Rights Act extension, the Senate Judiciary Committee listed out factors that could be considered in evaluating a Section 2 VRA claim. These factors allow experts to inform the court as to the extent that minorities “are denied equal access to the political process.”

Senate Factor 5 examines the extent that minority group members (here, Black individuals) in a political jurisdiction (in this case the state of Georgia) bear the effects of discrimination in education, employment, and health that hinder said group’s political participation. Without a doubt, my analysis demonstrates that Black Georgians face clear and significant disadvantages in the above areas that reduce their ability to participate in the political process.

This analysis also speaks to Senator Factor 8: whether elected officials are less responsive to the particularized needs of the members of the minority group. My findings show that clear disparities across health and socioeconomic indicators impede Black Georgians' political participation. It follows that the political system is relatively unresponsive to Black Georgians; otherwise, we would not observe such clear disadvantages in healthcare, economics, and education.

B. Socioeconomic Disparities

Starting with the 2015-2019 ACS, I constructed the following metrics for both the Black and white populations in Georgia: household median income; total households reporting income above \$100,000; total households reporting income above \$125,000; households receiving Supplemental Nutrition Assistance Program (SNAP, or food stamps) benefits in the past 12 months; percent of the population living below the poverty line in the last 12 months; percent of children living below the poverty line; percent of adults living below the poverty line; percent of the population over the age of 25 with a high school diploma; percent of the population over the age of 25 with a college degree; unemployment rate; percent of the population reporting a disability; and percent of the population reporting health insurance. These metrics reflect broad racial disparities in education, employment, and health.

As shown in Table 1, there are clear racial disparities in employment. The unemployment rate among Black Georgians (8.7%) is nearly double that of white Georgians (4.4%). And disparities persist among those *with* employment: white households are twice as likely as Black households to report an annual income above \$100,000. Black Georgians, meanwhile, were more than twice as likely—and Black children in particular more than three times as likely—to live below the poverty line over the past year. Black Georgians were nearly three times more likely than white Georgians to receive SNAP benefits.

On education, Black adults over the age of 25 are more likely than their white peers to lack a high school diploma (13.3% compared to 9.4%). These disparities fare no better in higher education: 35% of white adults over the age of 25 have obtained a bachelor's degree or higher compared to 24% of their Black counterparts.

Finally, on health, the Black population in Georgia is more likely to report a disability (11.8% compared to 10.9% for whites) and is more likely to lack health insurance (18.9% compared to 14.2% among 19-64 year-olds). All told, the numbers convey consistent racial disparities across economics, health, employment, and education.

I also reproduced the same analyses using the 2016-2020 ACS. As shown in Table 2, the racial disparities reported above hold across the different economic, health, employment, and education metrics.

	Black	White	White - Black
Median Household Income	\$44670	\$67955	\$23285
Pct. HH Income > \$100K	0.165	0.322	0.157
Pct. HH Income > \$125K	0.096	0.224	0.128
Pct. HH receiving SNAP	0.227	0.077	-0.15
Pct. below poverty line	0.215	0.101	-0.114
Pct. below poverty line, children	0.313	0.115	-0.198
Pct. below poverty line, VAP	0.18	0.098	-0.082
Pct. w/ Less than HS Diploma	0.133	0.094	-0.039
Pct. w/ Bachelor's Degree or higher	0.24	0.351	0.111
Pct. Unemployed	0.087	0.044	-0.043
Pct Disabled, ages 19-64	0.118	0.109	-0.009
Pct. Uninsured, ages 19-64	0.189	0.142	-0.047

Table 1. Socioeconomic indicators across Black and white Georgians, 2015-2019 ACS.

	Black	White	White - Black
Median Household Income	\$46964	\$70784	\$23820
Pct. HH Income > \$100K	0.18	0.34	0.16
Pct. HH Income > \$125K	0.108	0.24	0.132
Pct. HH receiving SNAP	0.222	0.071	-0.151
Pct. below poverty line	0.201	0.098	-0.103
Pct. below poverty line, children	0.293	0.108	-0.185
Pct. below poverty line, VAP	0.169	0.095	-0.074
Pct. w/ Less than HS Diploma	0.124	0.088	-0.036
Pct. w/ Bachelor's Degree or higher	0.251	0.358	0.107
Pct. Unemployed	0.085	0.043	-0.042
Pct Disabled, ages 19-64	0.121	0.109	-0.012
Pct. Uninsured, ages 19-64	0.187	0.141	-0.046

Table 2. Socioeconomic indicators across Black and white Georgians, 2016-2020 ACS.

These patterns hold across nearly every county in the state. Using the 2015-2019 ACS, I gathered the same metrics at the county level and considered only counties with at least 1,000 white and 1,000 Black residents. Georgia has 159 counties; of these, 141 meet this threshold. Whites have a higher median household income than Blacks in 136 of 141 of these counties.¹ Just two counties—Habersham and Paulding—feature a higher Black median household income (Habersham: \$64,286 vs. \$50,418; Paulding: \$50,418 vs. \$68,843). Among households making more than \$100,000, whites have an advantage over Blacks in 140 of the 141 counties.

Turning to SNAP, a higher percentage of Blacks have relied on SNAP in the past 12 months than whites in 140 of the 141 counties. In 136 of the 141 counties, Blacks are more likely to live below the poverty line than are whites. And in 130 of the 141 counties, whites are more likely than Blacks to have a 4-year college degree or higher.

¹ The ACS does not provide median income for Black households in three counties so these counties are treated as missing for this median household income comparison.

While the county distribution is not as pronounced with respect to unemployment and uninsured status, these disparities are still heavily weighted towards Black disadvantage. Blacks have a higher unemployment rate than whites in 118 of the 141 counties (84%), and the share of the population that is uninsured is higher for Blacks than for whites in 92 of the 141 counties (65%).²

C. Effect on Political Participation

1. Academic Literature

Socioeconomic disparities like these unquestionably affect political participation. There is a vast literature in political science that demonstrates a strong and consistent link between socioeconomic status (SES) and voter turnout. In general, voters with higher income and education are disproportionately likely to vote and participate in American politics (Wolfinger and Rosenstone 1980; Leighley and Nagler 2013; Nie et al. 1996; Mayer 2011). Brady, Verba, and Schlozman (1995) argue that resources—conceptualized as time, money, and civic skills (all related to education and income)—drive donation behavior, campaign volunteering, and voting. These broad SES findings hold using a variety of research designs. For example, Henderson (2018) uses a hookworm eradication program haphazardly (i.e., at random) applied to counties in the early 20th century South (the program exogenously covaries with educational attainment) to show a causal relationship between education and political participation.

Other research is in accord. Avery (2015) indicates that states with higher income inequality have greater income bias in turnout. Shah and Wichowsky (2019) show a link between home foreclosures and participation: Neighborhoods with a higher share of home foreclosures during the 2008 financial crisis subsequently experienced a drop in voter turnout, and affected individuals were less likely to vote in future elections. And findings in Pacheco and Fletcher (2015) indicate an association between self-reported health and voter turnout.

This overwhelming academic literature shows that the socioeconomic disadvantages suffered by Black Georgians affect their ability to participate in the political process.

This means that the political system does not respond to Black Georgians in the same way it responds to white Georgians. If the system did respond, we would expect to see fewer gaps in both health and economic indicators and a reduction in voter turnout gaps. A clear and consistent finding in political science research demonstrates that elected officials do not respond to constituent inquiry from minorities as readily as they do to white constituents (Barreto et al. 2004; Costa, 2017; White et al., 2015).

2. Voter Turnout

When Georgians register to vote, they indicate their race. The Georgia Secretary of State maintains yearly statewide-, county-, and precinct-level voter registration and turnout by race. I gathered

² My conclusions about the reported racial disparities do not change when relying on the 2016-2020 ACS.

these data for the 2020 and 2022 general elections.³ To calculate voter turnout, for both Black and white Georgians, I divided the total number of Black and white people who voted by the total number of the respective registered voter counts.

a. Statewide Analysis

For the years 2010-2022, I gathered statewide turnout data by race. The 2010-2012 turnout data is only available on the Secretary of State's website at the statewide level. Table 3 displays even-year statewide general election voter turnout by race across the 2010-2022 time period. This is a comprehensive list of elections as it covers both midterm and presidential election cycles.

For each election cycle, registered white voters turned out at higher rates than did registered Black voters. For instance, during the 2022 midterm election, whites turned out at 58.3%, whereas Blacks turned out at 45.0%, which translates into a gap of 13.3 percentage points in turnout. A similar gap (12.6%) is visible in the 2020 presidential election cycle. This Black-white gap is most narrow during President Obama's 2012 re-election – at 3.1% -- but in every single case whites vote at a noticeably higher rate than do Blacks.

Year	Black TO	White TO	Gap	Total Turnout
2022	45	58.3	-13.3	50.5
2020	60	72.6	-12.6	65.7
2018	53.9	62.2	-8.3	56.4
2016	56.2	67.9	-11.6	62
2014	40.6	47.5	-6.9	42.9
2012	72.6	75.7	-3.1	72.9
2010	50.4	55.9	-5.5	52.1

Table 3. Statewide voter turnout by race, 2010-2022.

b. Countywide Analysis

Next, I compared the share of a county's white registrants who voted in 2022 against the share of a county's Black registrants who voted in 2022. Figure 1 visually compares turnout (denominator is registration) between whites and Blacks across the state's counties. In almost every single county, white registrants voted at higher rates than did Black registrants. This is visually demonstrated by the fact that almost all of the dots (counties) fall below the blue identity line, as opposed to above. Only in Chattahoochee and Liberty Counties did Black registrants cast ballots

³ This data was previously available at: https://sos.ga.gov/index.php/elections/general_election_turnout_by_demographics_november_2020.

at (slightly) higher rates than did white registrants. Using 2020 data, I find nearly identical results, as illustrated in Figure 2.

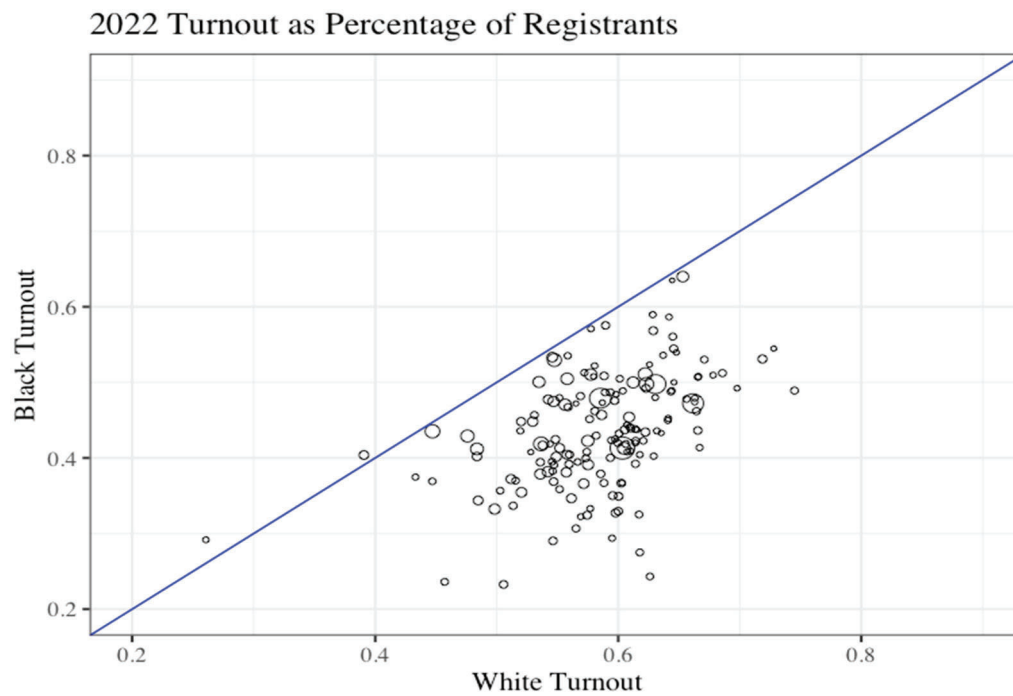


Figure 1. 2022 turnout by county; white-Black differential based on voter registration.

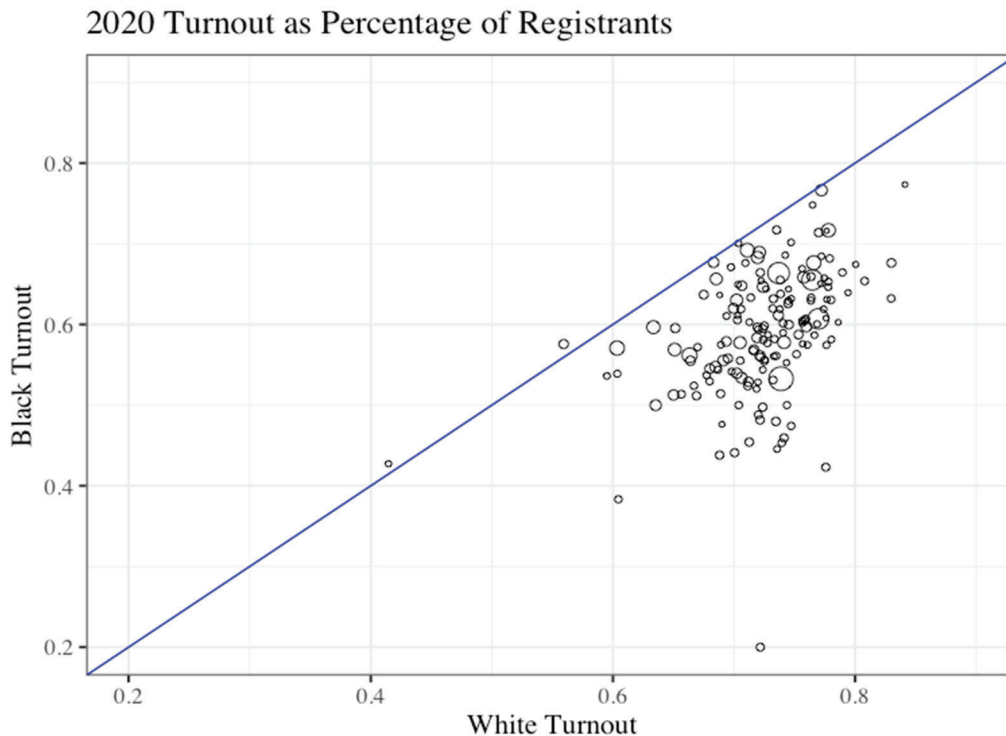


Figure 2. 2020 turnout by county; white-Black differential based on voter registration.

Below, Figures 3 and 4 plot out the same relationship but swap out registration for voting age population (VAP) as the denominator. The relationship is very similar using both 2022 and 2020 turnout data. Stated differently, the substantive findings do not change regarding which denominator is selected: white Georgians clearly vote at higher rates than Black Georgians.

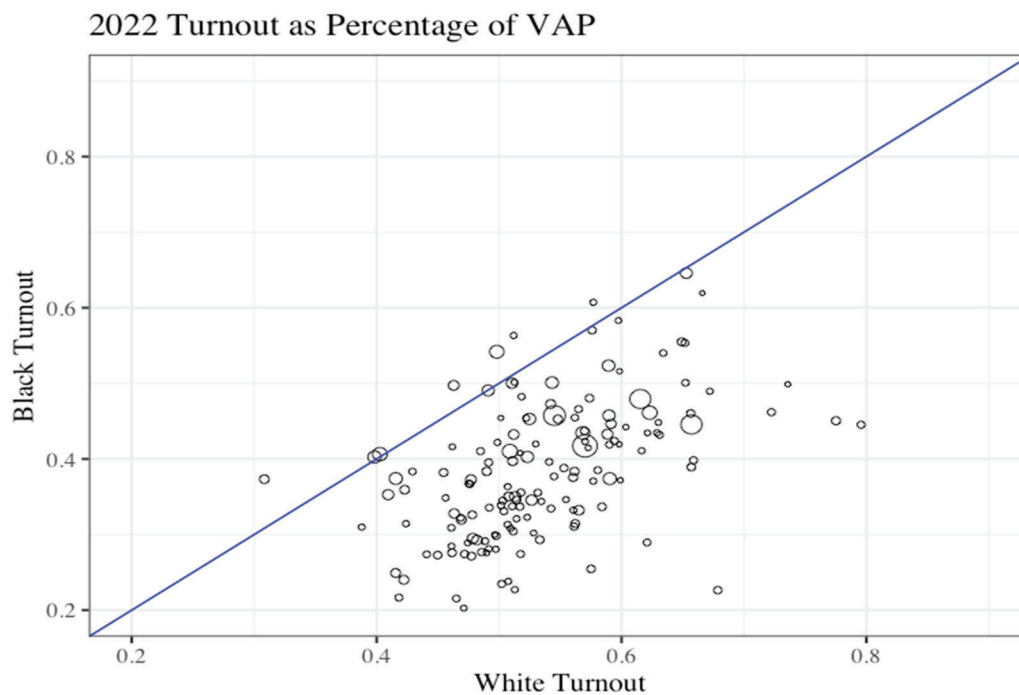


Figure 3. 2020 turnout by county; white-Black differential based on VAP.

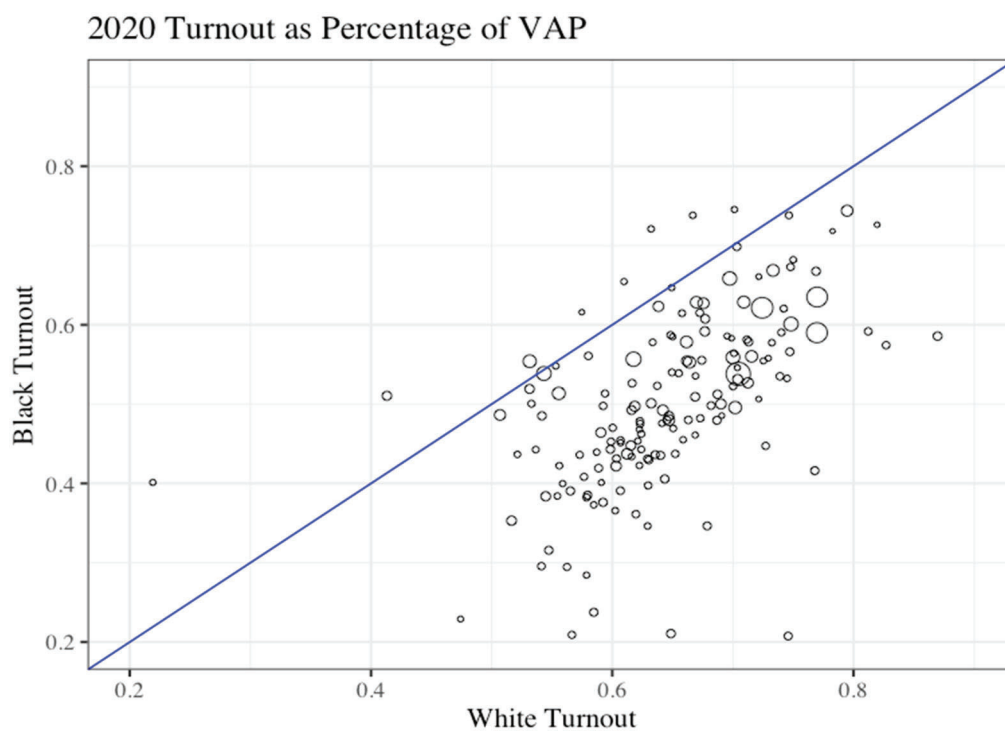


Figure 4. 2020 turnout by county; white-Black differential based on VAP.

I also replicated the white-Black turnout differential analysis for the 2014-2018 elections because such data are readily available from the Georgia Secretary of State. Figure 5 plots out the 2018 white vs. Black turnout gap and demonstrates substantively the same trends discussed above. Figures 6 and 7 present the same analyses for the 2016 and 2014 elections, respectively.

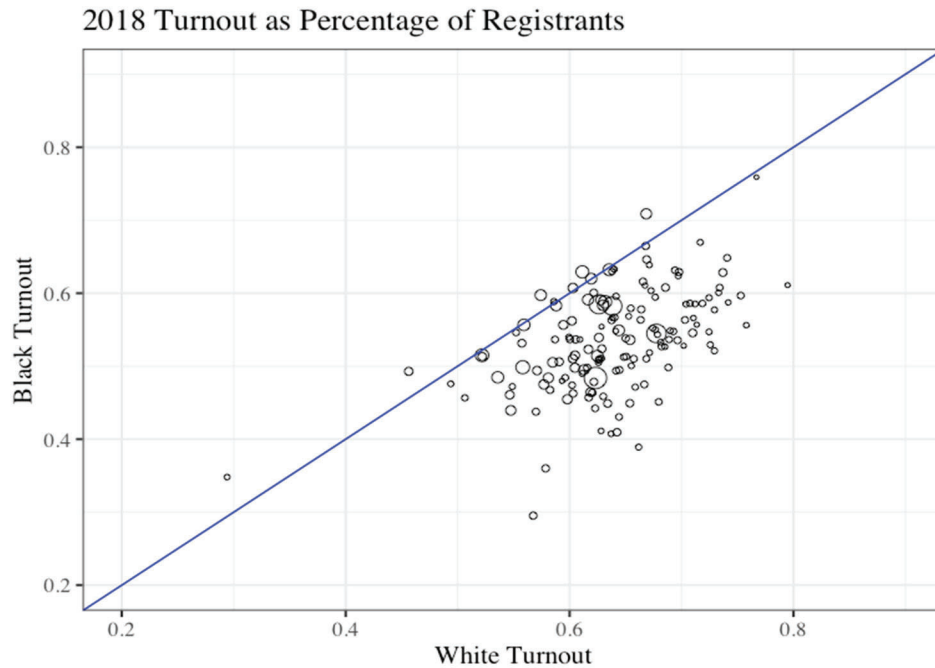


Figure 5. 2018 turnout by county; white-Black differential based on voter registration.

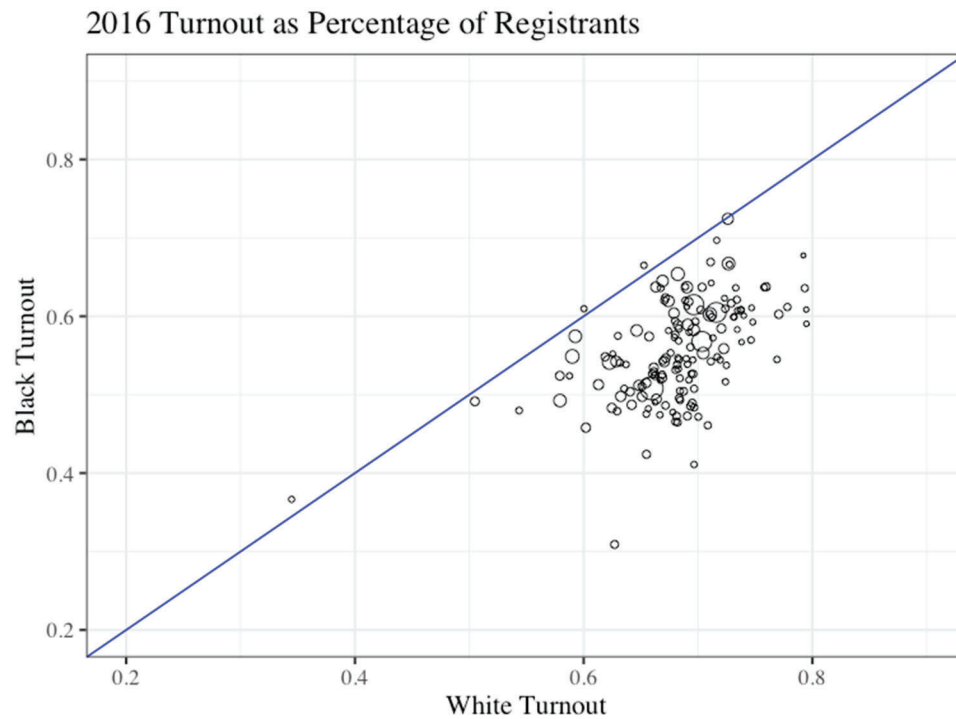


Figure 6. 2016 turnout by county; white-Black differential based on voter registration.

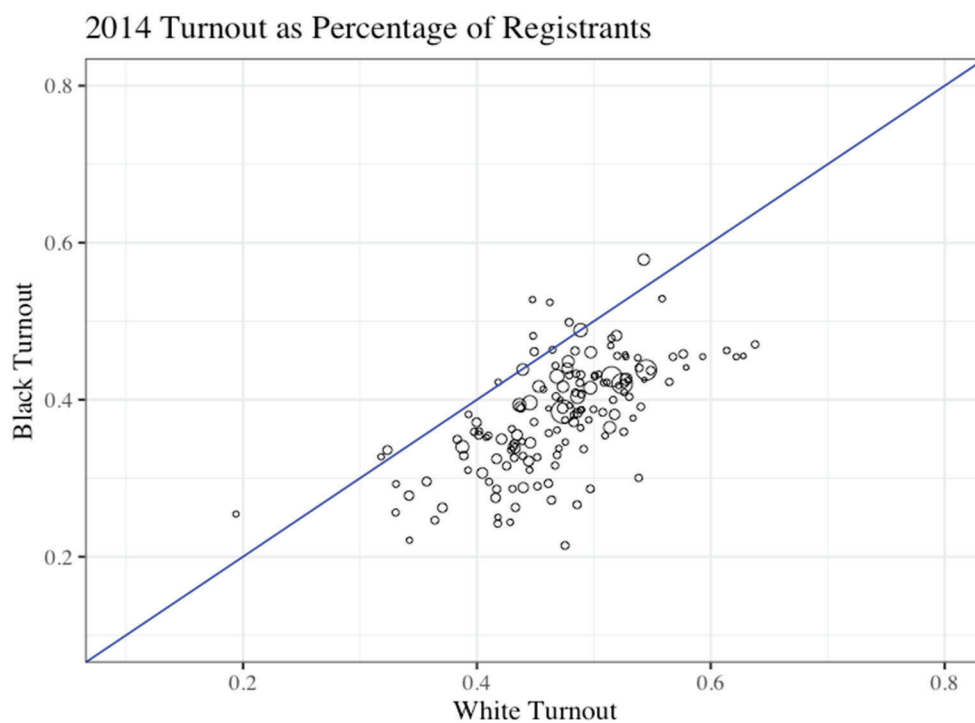


Figure 7. 2014 turnout by county; white-Black differential based on voter registration.

c. Precinct-Level Analysis

I replicated the 2020 and 2022 county analysis with Georgia precincts gathered from the Secretary of State's website.⁴ The 2020 precinct file contains 2,784 precincts across the state and the 2022 precinct file contains 2,852 precincts. Both files include both registration and votes cast for whites and Blacks. I then subset the datasets to precincts with more than 100 Blacks and 100 whites to reduce the influence of outliers—namely, extremely small precincts. This resulted in a total of 1,957 precincts in the 2020 data and 2,010 precincts in the 2022 data.

The analysis of precinct-level turnout does not change the core substance of the reported findings. Of the 1,957 precincts in 2020, whites have a higher turnout in 1,549 (79.2%) precincts and Blacks in only 408 (20.8%) precincts. In 2022, whites have a higher turnout in 1,629 (81.0%) of the precincts, while Blacks have a turnout advantage in only 381 (19.0%) of the precincts. Figures 8 and 9 visually display the results, which are consistent with both the statewide and county analyses. The clear majority of precinct dots fall below the blue identity line.

⁴ This data was previously available at: https://sos.ga.gov/index.php/elections/general_election_turnout_by_demographics_november_2020.

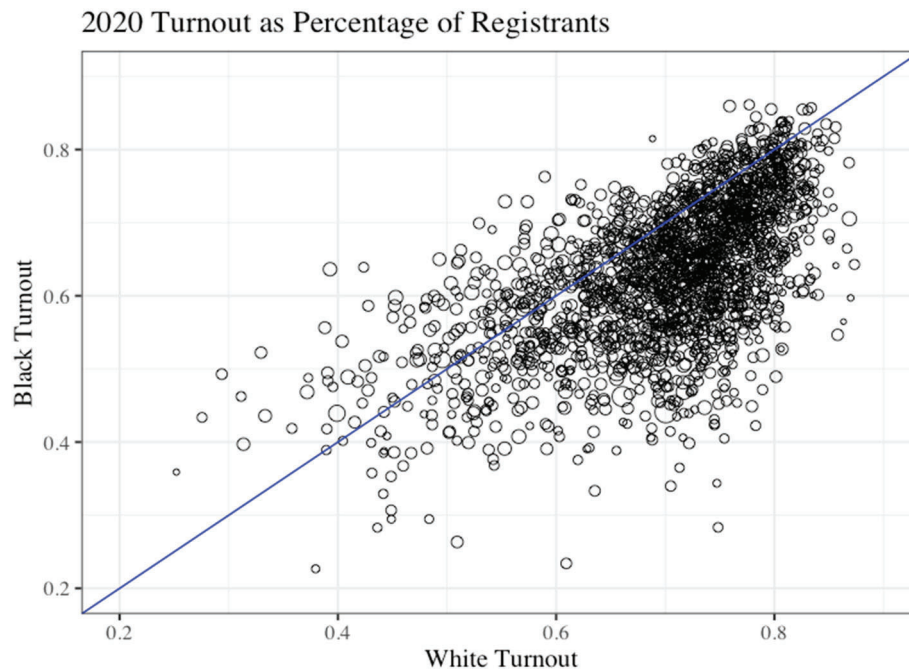


Figure 8. 2020 turnout by precinct; white-Black differential based on voter registration.

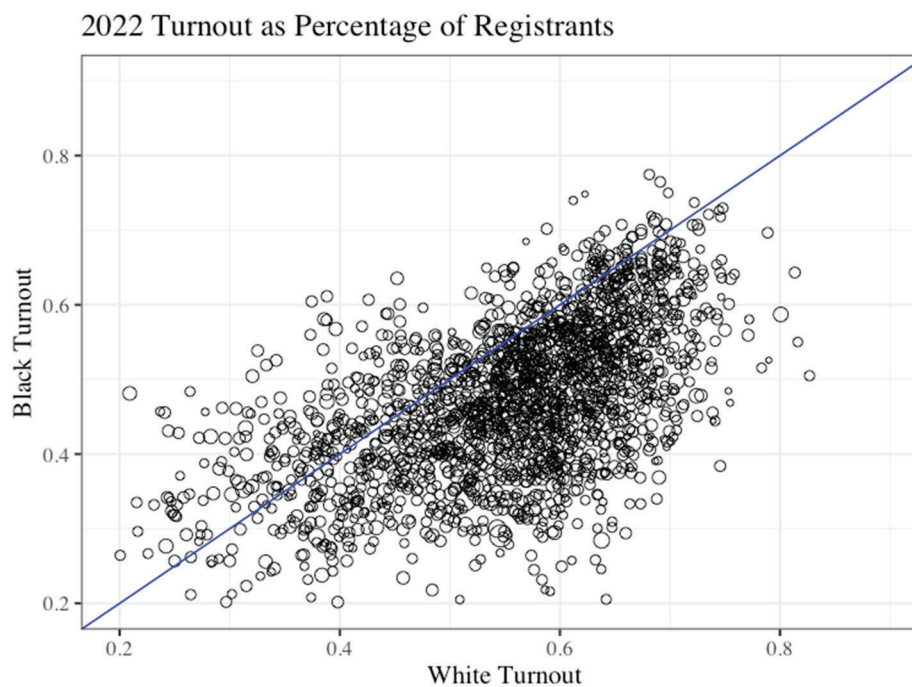


Figure 9. 2020 turnout by precinct; white-Black differential based on voter registration.

d. Analysis of Atlanta-Sandy Springs-Alpharetta Metropolitan Area

I also examined Black vs. white voter turnout rates in the Atlanta metropolitan area and Black Belt. For the former, I analyzed a subset Georgia counties: those in the Atlanta-Sandy Springs-Alpharetta Metropolitan Statistical Area.⁵ Figures 10 through 13 plot out the white vs. Black turnout gap in the 2020 and 2022 general elections based on both registration and voting age population as the denominators. The trend is very similar to the overall statewide trend. In the 2020 election, Black turnout was not higher than white turnout in any of the counties. This result is consistent with the 2022 election, except that Black turnout very slightly exceeded white turnout in only three counties (Clayton, Henry, and Rockdale) when using voting age population, rather than registration, as the denominator.

⁵ The counties include: Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spalding, and Walton.

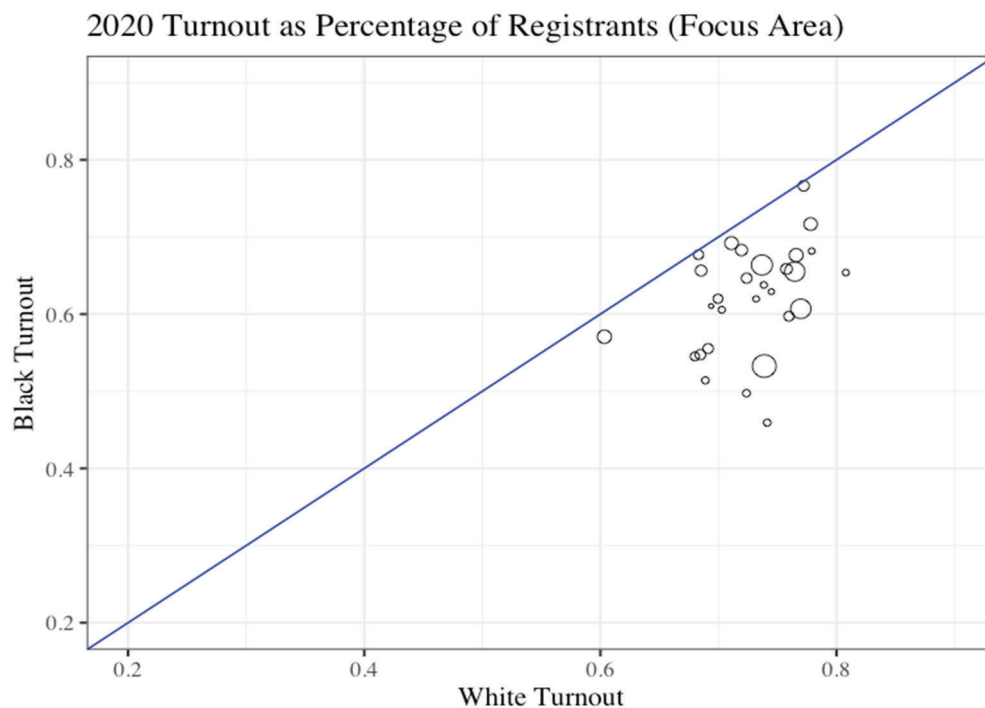


Figure 10. 2020 turnout by county in Atlanta metropolitan area; white-Black differential based on voter registration.

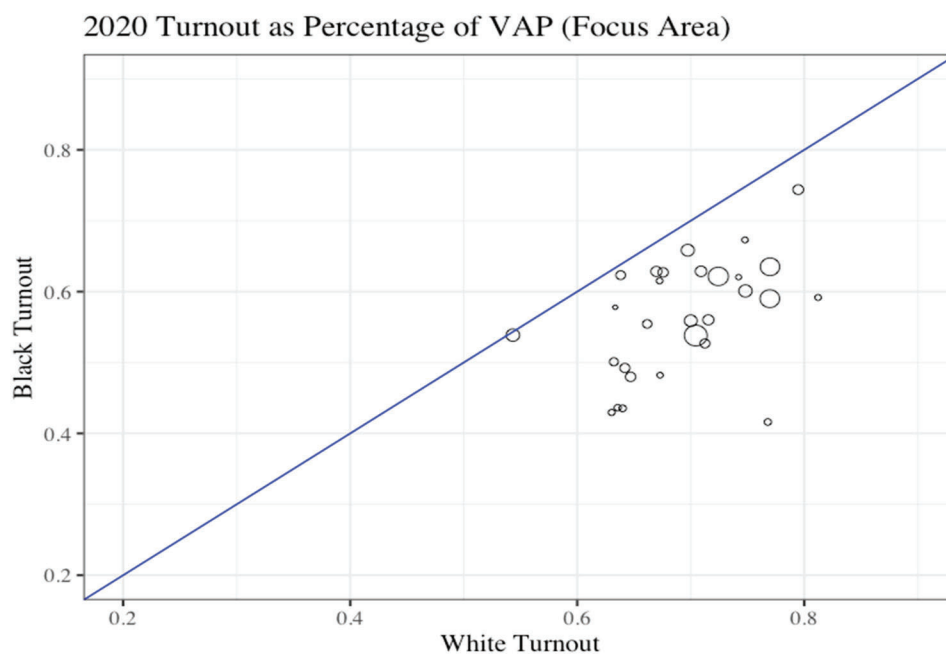


Figure 11. 2020 turnout by county in Atlanta metropolitan area; white-Black differential based on VAP.

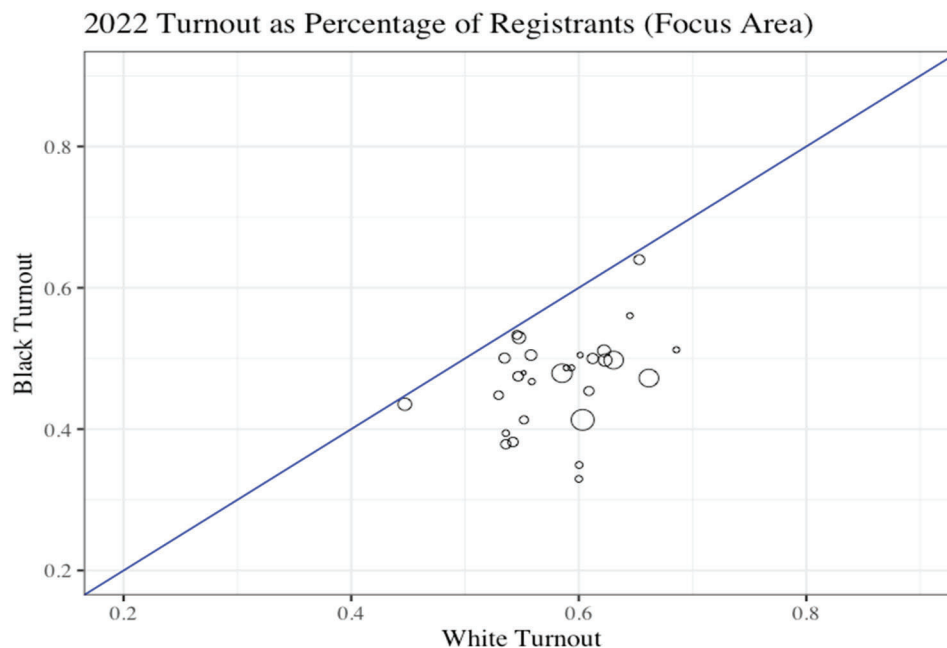


Figure 12. 2022 turnout by county in Atlanta metropolitan area; white-Black differential based on voter registration.

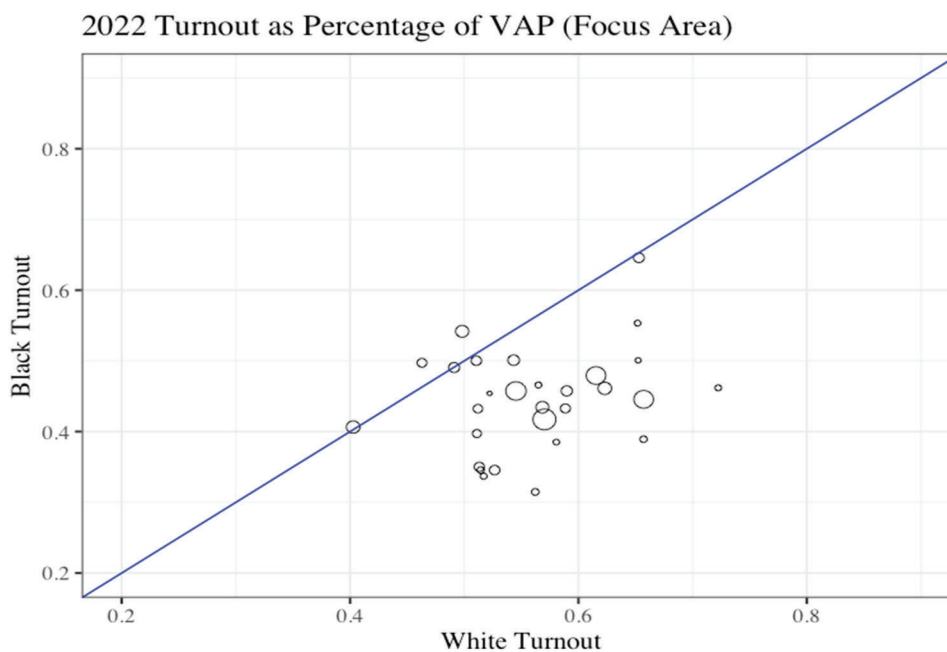


Figure 13. 2020 turnout by county in Atlanta metropolitan area; white-Black differential based on VAP.

Finally, I conducted the same analysis among precincts falling in the same set of counties. Again, as shown in Figures 14 and 15, whites vote at higher rates than do Blacks in the overwhelming majority of precincts.

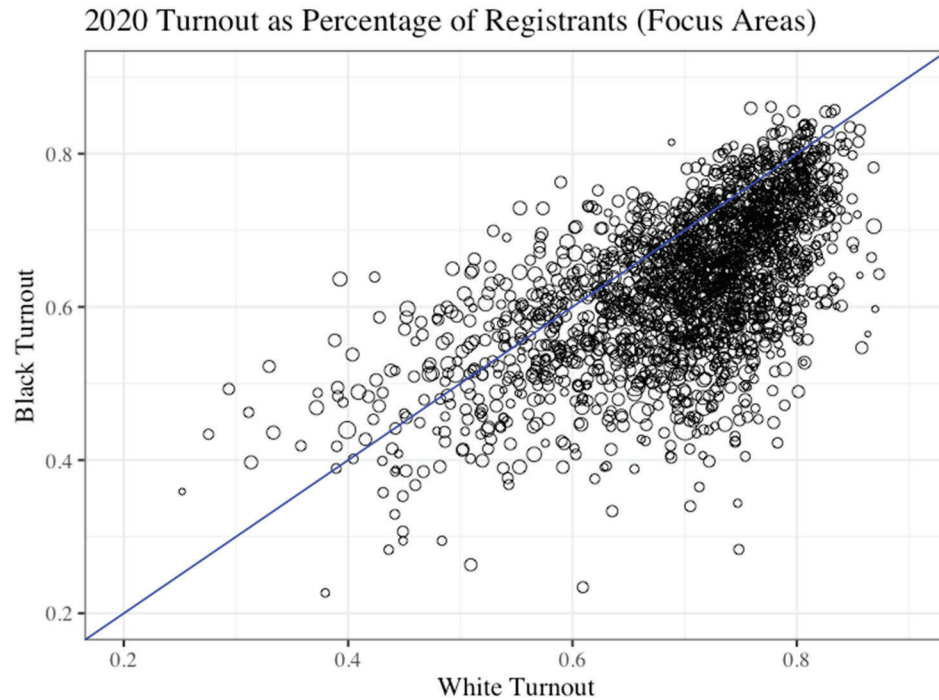


Figure 14. 2020 turnout by precinct in Atlanta metropolitan area; white-Black differential based on voter registration.

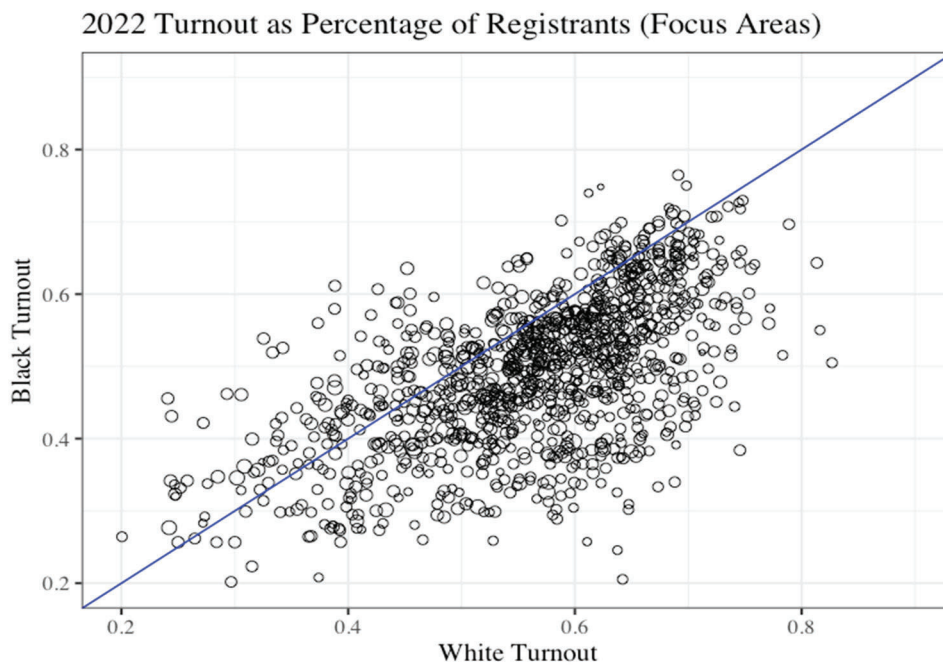


Figure 15. 2022 turnout by precinct in Atlanta metropolitan area; white-Black differential based on voter registration.

e. Analysis of the Black Belt Area

As an additional set of analyses, I examined 2020 and 2022 Black vs. white voter turnout rates in the traditional “Black Belt” area of the state. The geographic area includes the following counties, which I subset the data to: Baker, Bibb, Burke, Calhoun, Chattahoochee, Clay, Dooly, Dougherty, Early, Glascock, Hancock, Houston, Jefferson, Lee, Macon, Marion, McDuffie, Miller, Mitchell, Muscogee, Peach, Quitman, Randolph, Richmond, Schley, Stewart, Sumter, Talbot, Taliaferro, Taylor, Terrell, Twiggs, Warren, Washington, Webster, and Wilkinson.

Figures 16 through 19 plot out the Black vs. white turnout gap based on both registration and VAP in this area. The trend is very similar to the overall statewide trend for both the 2020 and 2022 general elections.

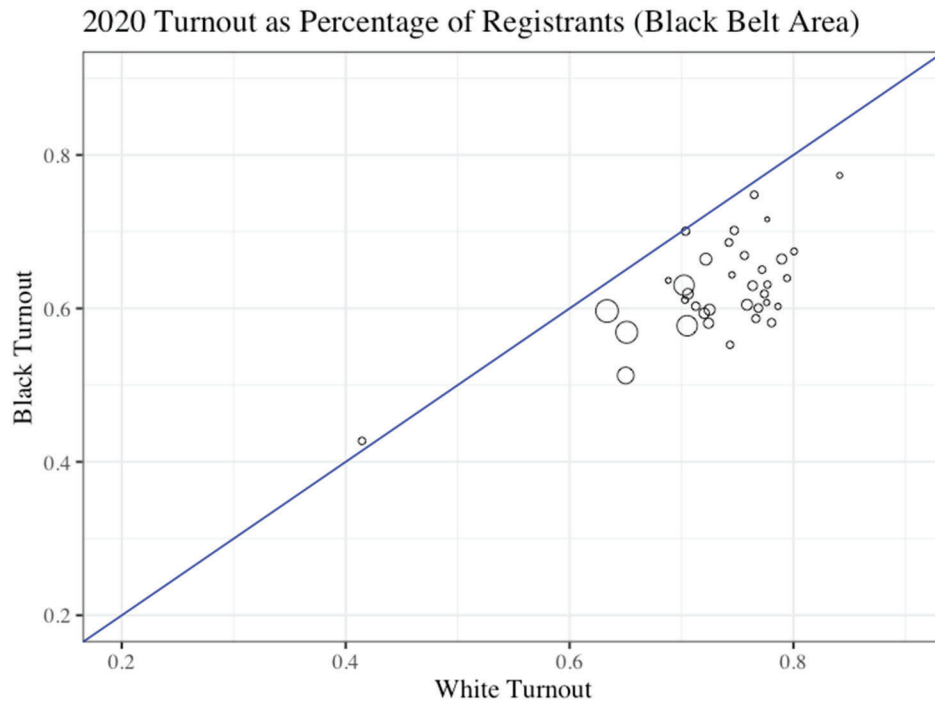


Figure 16. 2020 turnout by county in Black Belt; white-Black differential based on voter registration.

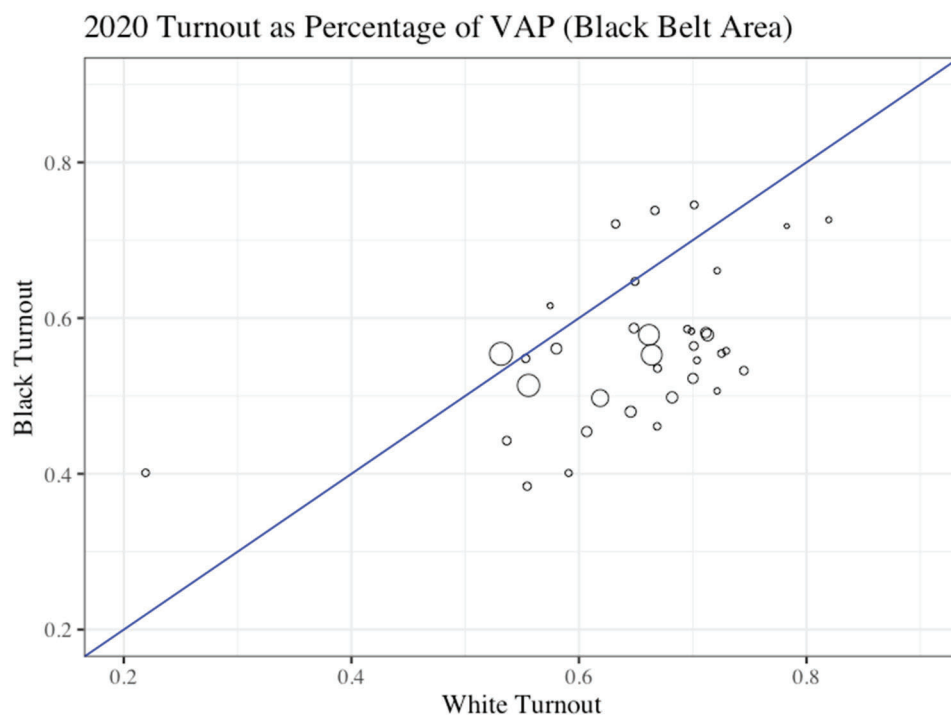


Figure 17. 2020 turnout by county in Black Belt; white-Black differential based on VAP.

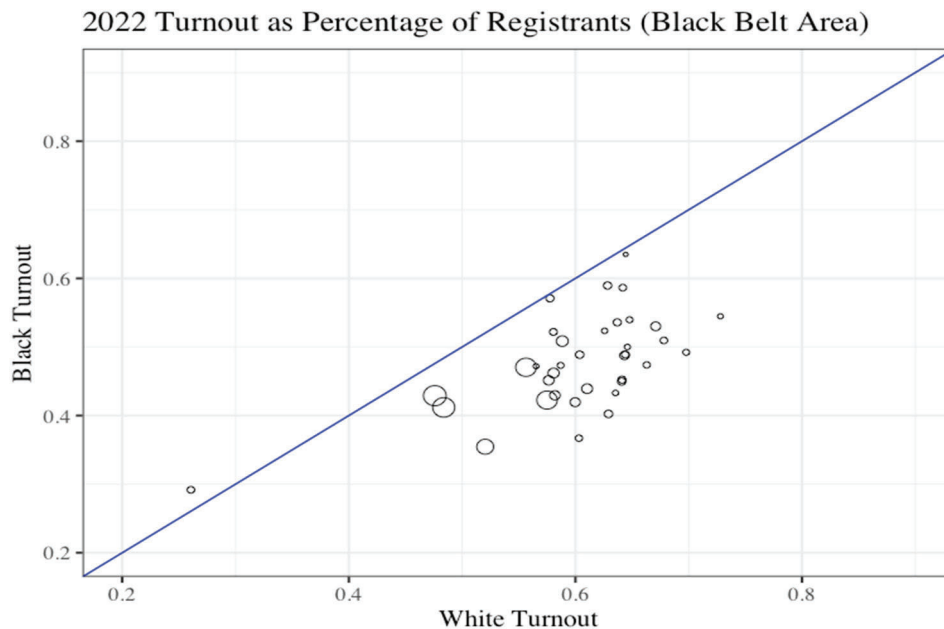


Figure 18. 2022 turnout by county in Black Belt; white-Black differential based on voter registration.

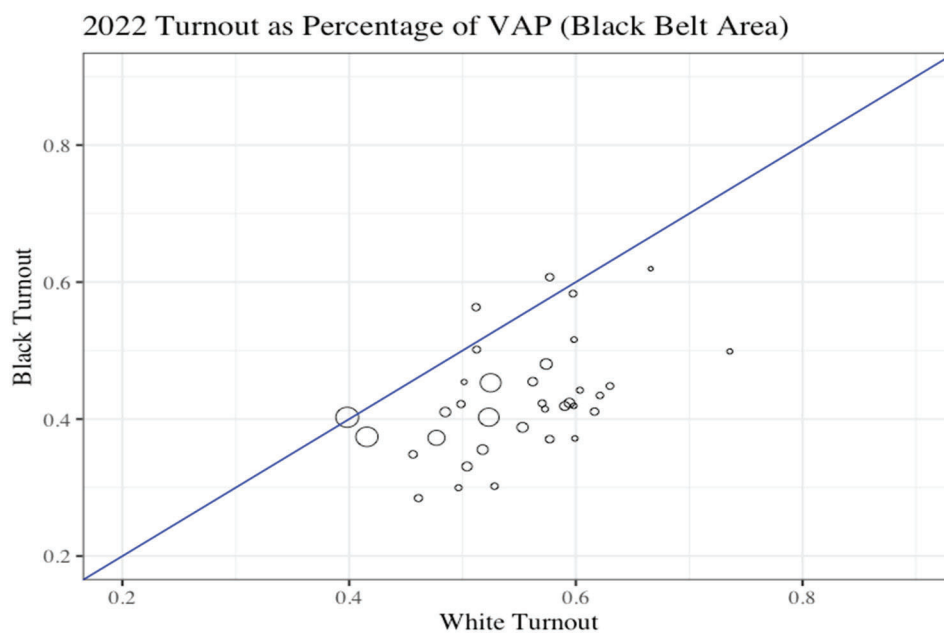


Figure 19. 2020 turnout by county in Black Belt; white-Black differential based on VAP.

Similar to the analysis in the Atlanta metropolitan area, I examined the white-Black turnout differential among precincts falling into the set of Black Belt counties. As depicted in Figures 20 and 21, once again, I find that whites vote at higher rates than do Blacks in the clear majority of the precincts.

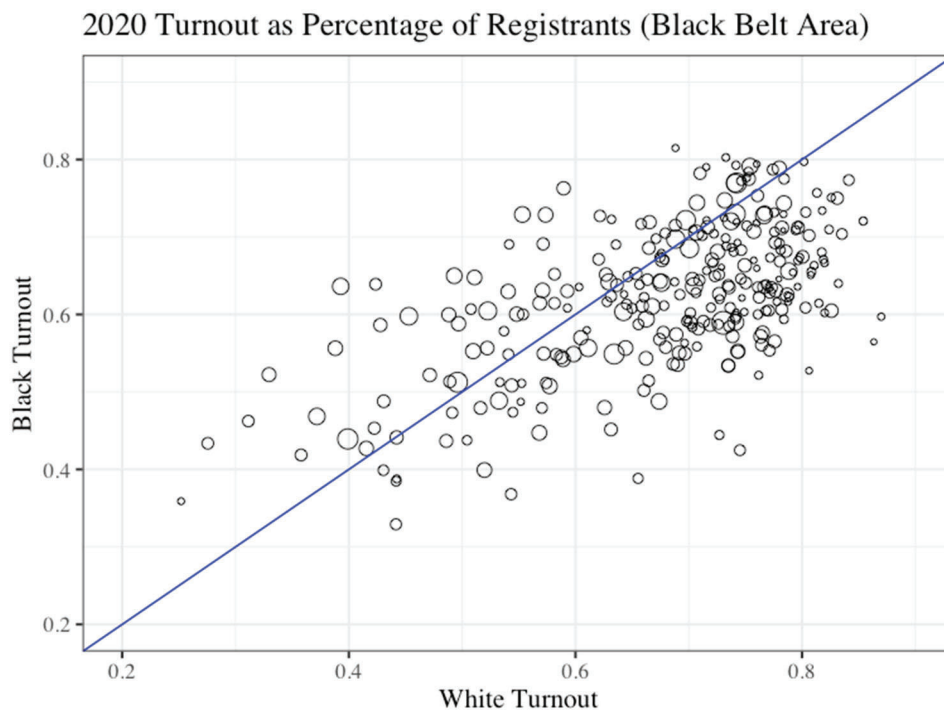


Figure 20. 2020 turnout by precinct in Black Belt; white-Black differential based on voter registration.

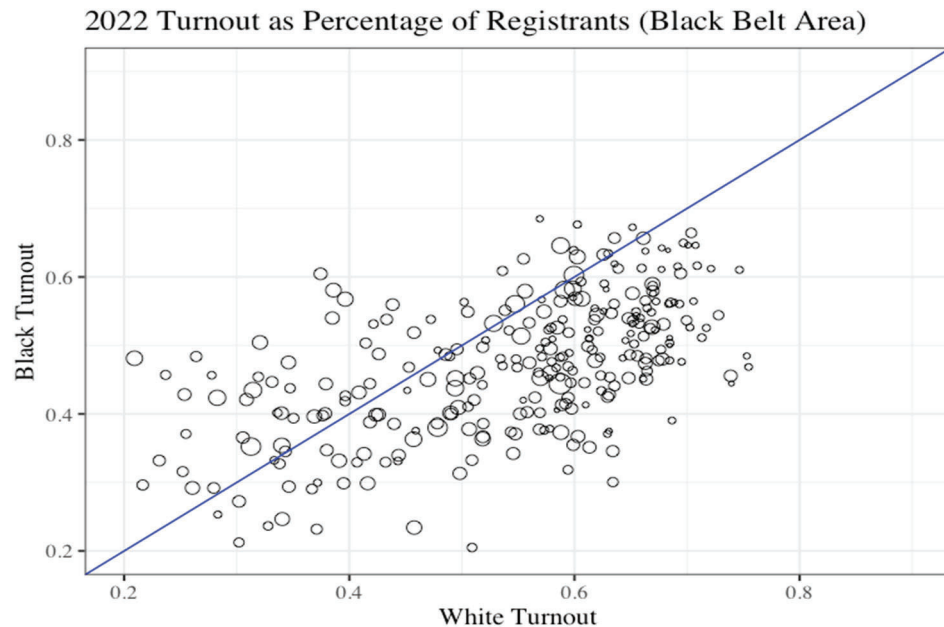


Figure 21. 2022 turnout by precinct in Black Belt; white-Black differential based on voter registration.

f. Relationship Between Turnout in 2020 and Socioeconomic Disparities

This section examines how the documented turnout differences are related to the socioeconomic disparities discussed at the outset of this report, like education and income, using both the 2015-2019 and 2016-2020 ACS datasets. Specifically, I examined the county-level relationship between different measures of Black educational attainment and Black voter turnout using the 2020 general election data.⁶ Figure 22 plots out the relationship between percent Black with less than a high school education and Black voter turnout using the 2015-2019 ACS.⁷ The blue line is the bivariate regression line ($\beta = -0.35$, $p < 0.001$), which shows that each 10-percentage-point increase in the size of the Black population without a high school degree decreases Black turnout by 3.5 percentage points. The difference between counties with the highest percentage of Black population with less than a high school education compared to counties with the lowest percentage of Black population with less than a high school degree (referred to as “min-max effects”)⁸ surmounts to a decline of 11.8 [7.0, 16.5] percentage points in the Black turnout.

Figure 23 shows that these relationships hold when relying on the 2016-2020 ACS estimates for educational attainment. Specifically, a 10-percentage-point increase in the size of the Black population without a high school degree corresponds to a statistically significant 3.8 percentage point ($p < 0.001$) decline in the Black turnout. The corresponding min-max decline in turnout is 12.4 [7.5, 17.3] percentage points.

⁶ I replicated this analysis using 2022 turnout data, as shown in subsection (g).

⁷ For each analysis I subset the data to counties with more than 1,000 registered Black voters. I do this to avoid outlier issues that can emerge with smaller counties. However, this subset does not change in any substantive way the results compared to a full data analysis. All regression analyses are weighted by total Black registration in the county.

⁸ Min-max effect is the discrete change of moving from minimum to maximum value of the independent variable (for example, percent black population without high school education). Ninety-five percent (95%) confidence intervals for each estimate are reported in brackets.

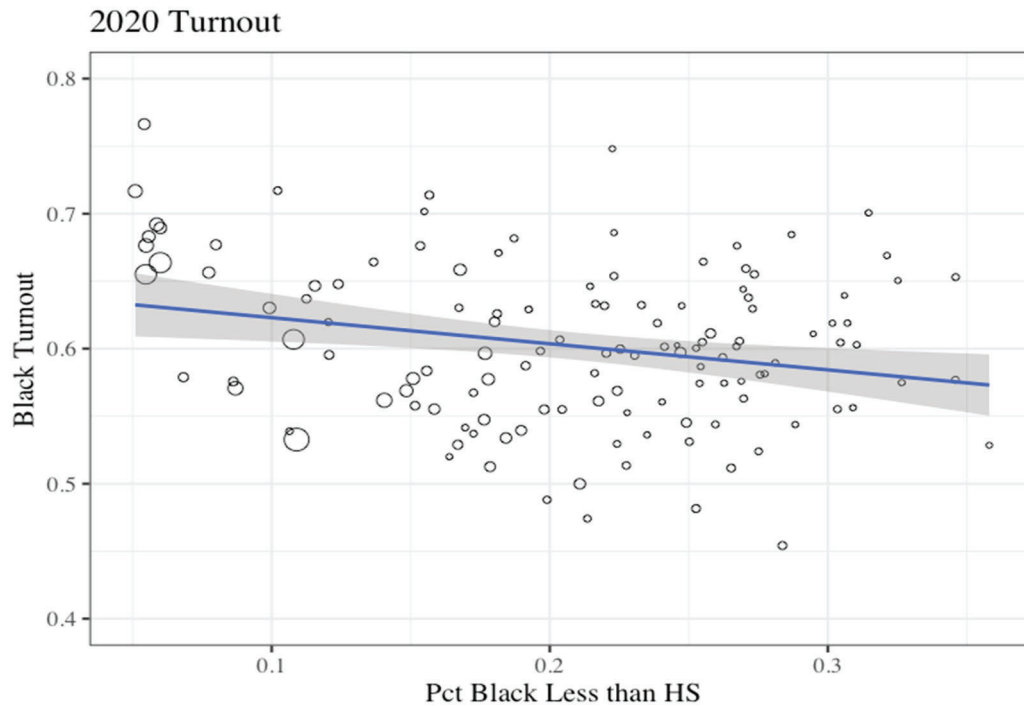


Figure 22. Association between Black less than high school education and 2020 Black turnout (2015-2019 ACS).

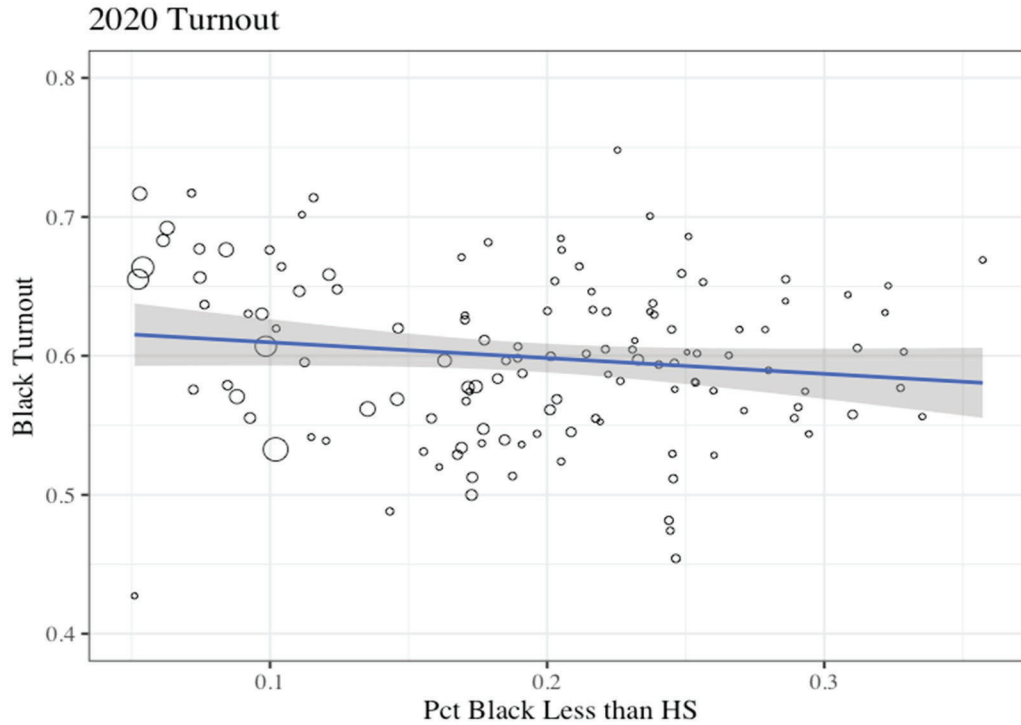


Figure 23. Association between Black less than high school education and 2020 Black turnout (2016-2020 ACS).

Figure 24 plots the relationship between the share of Blacks with a 4-year college degree and the share of Black registrants who voted by county. The relationship paints an inverse picture to the previous plot. As a county's Black education rises, so does the turnout rate. A bivariate regression reveals a statistically significant relationship ($\beta = 0.23$, $p < 0.001$), indicating that Black turnout rises 2.3 percentage points for each 10-percentage-point increase in percent Black 4-year degree, with a min-max effect size of 11.2 [6.9, 15.5] percentage points.

Figure 25 represents the same analysis using the 2016-2020 ACS. As shown, Black turnout increases by 2.1 percentage points for each 10-percentage-point increase in percent Black 4-year degree, with a min-max effect size of 11.8 [7.1, 16.6] percentage points. In both cases, I find statistically and substantively significant relationships between educational attainment and turnout, indicating that counties with lower levels of Black education are less likely than counties with higher levels of education to turnout.

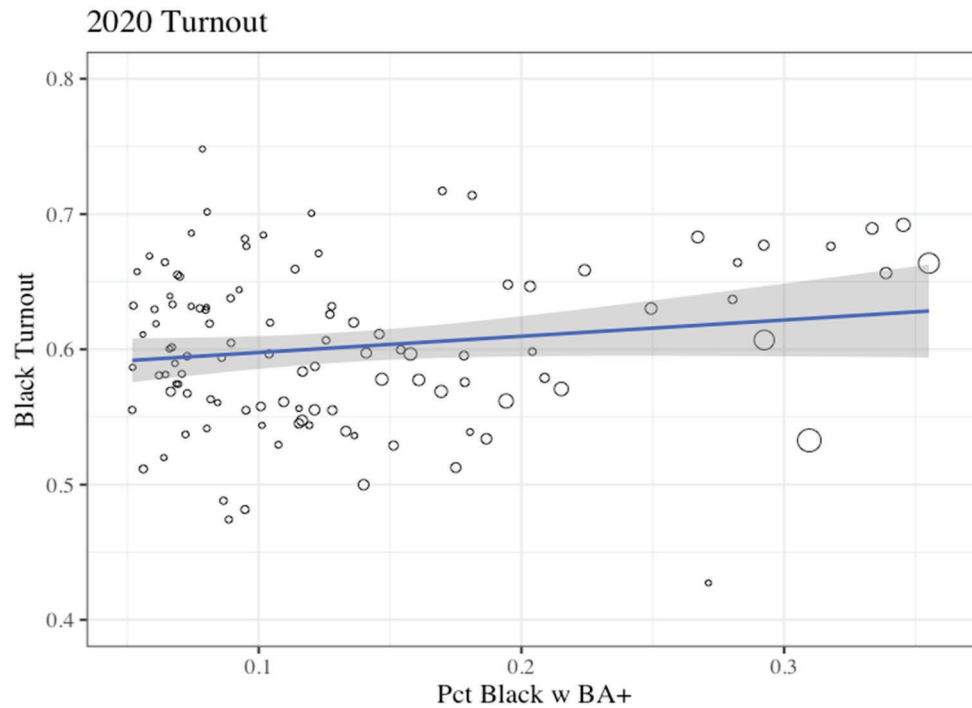


Figure 24. Association between Black 4-year degree and 2020 Black turnout (2015-2019 ACS).

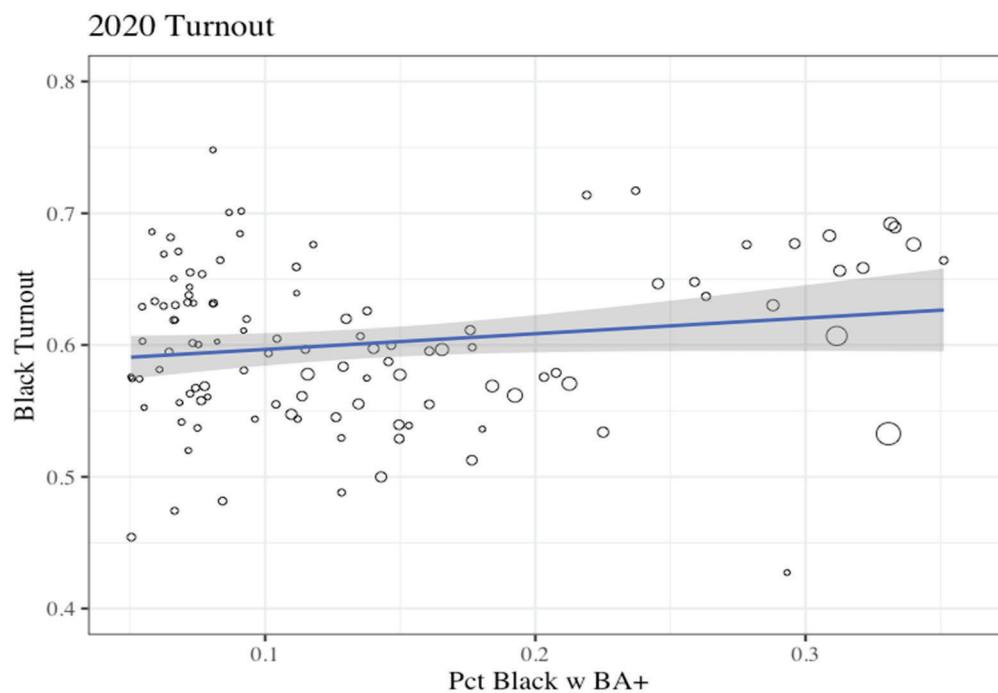


Figure 25. Association between Black 4-year degree and 2020 Black turnout (2016-2020 ACS).

Turning to income-related measures, Figure 26 plots out the relationship between the share of Blacks below the poverty line and the share of Black registrants who voted by county. As a county's Black poverty rises, the turnout rate declines. A bivariate regression reveals a statistically significant relationship ($\beta = -0.49$, $p < 0.001$), indicating that Black turnout falls 4.9 percentage points for each 10-percentage-point increase in percent Black below the poverty line. The min-max effect size is a decline of 25.7 [20.4, 31.1] percentage points in turnout, which is a substantively large gap between counties with the lowest Black poverty levels and those with the highest Black poverty levels.

Figure 27 visually depicts the same associations using the 2016-2020 ACS data. A 10-percentage-point increase in percent Black below the poverty line corresponds to a statistically significant 5.0 percentage point ($p < 0.001$) decline in turnout. The difference in turnout levels between counties with the highest and lowest poverty levels amounts to a 21.1 [16.6, 25.6] percentage point gap.

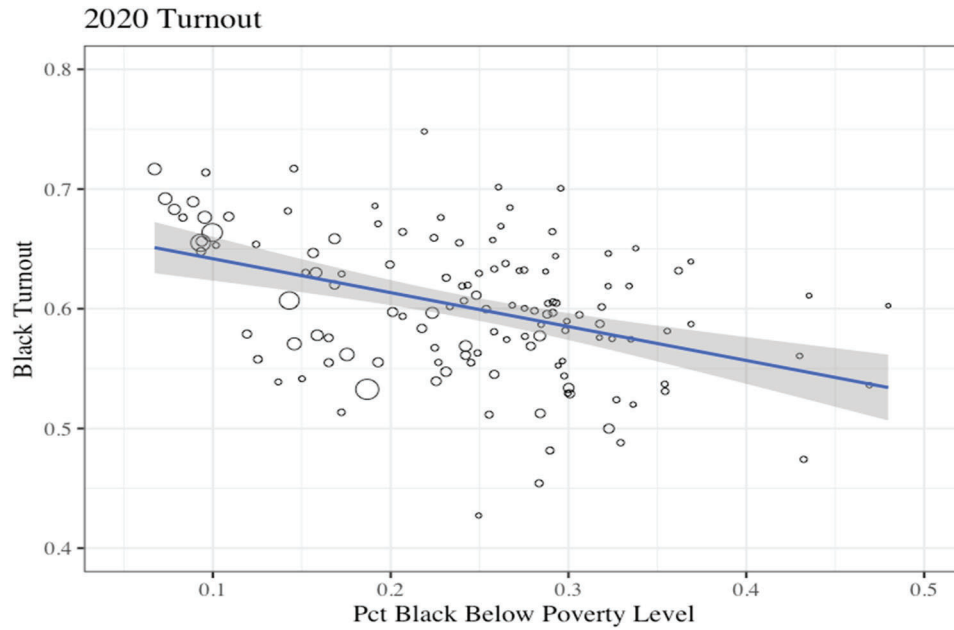


Figure 26. Association between Black poverty rates and 2020 Black turnout (2015-2019 ACS).

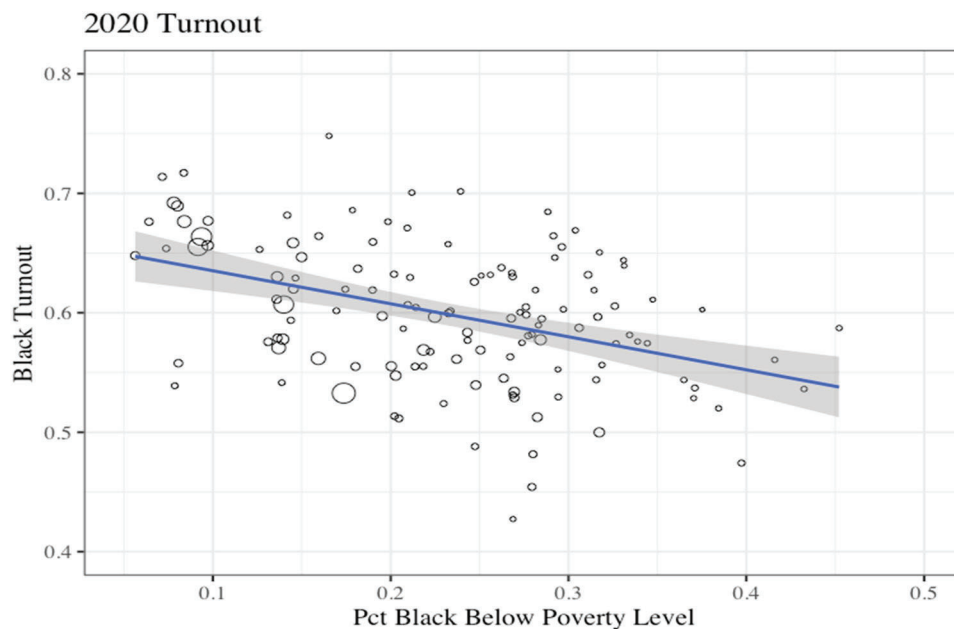


Figure 27. Association between Black poverty rates and 2020 Black turnout (2016-2020 ACS).

Lastly, Figures 28 and 29 plot the relationship between Black median household income and the share of Black registrants who voted by county. As a county's Black household income rises, the turnout rate rises. A bivariate regression with the 2015-2019 ACS data reveals a statistically significant relationship ($\beta = 0.117$, $p < 0.001$), and a min-max effect of 22.1 [17.5, 26.7] percentage points. The results are statistically and substantively similar using the 2016-2020 ACS: Counties with higher levels of Black median household income have a higher black turnout ($\beta = 0.120$,

$p < 0.001$). The discrete difference between such counties amounts to a min-max effect size of 20.5 [16.4, 24.7] percentage points in turnout.

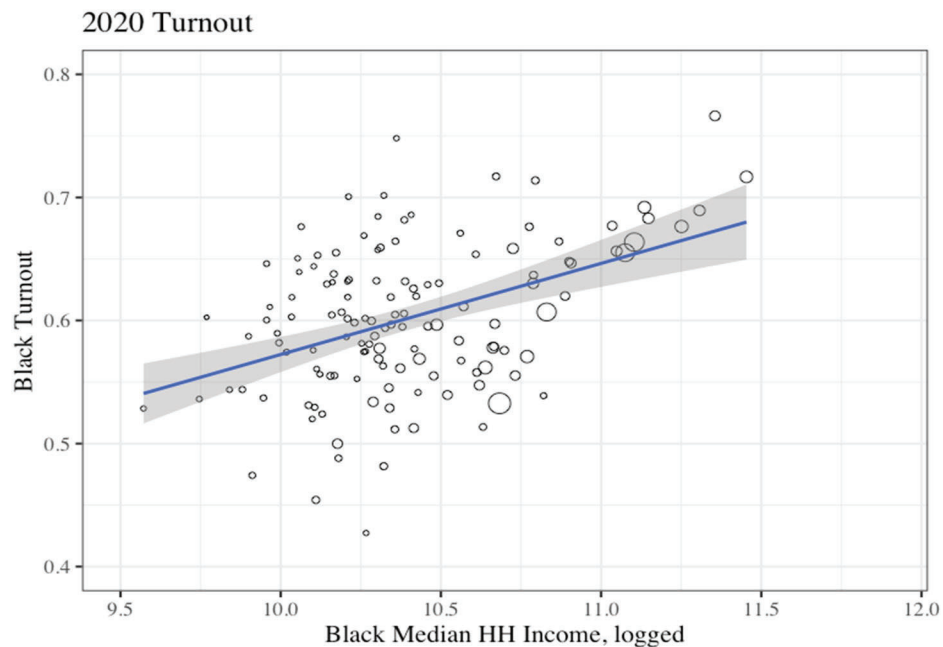


Figure 28. Association between Black median household income and 2020 Black turnout (2015-2019 ACS).

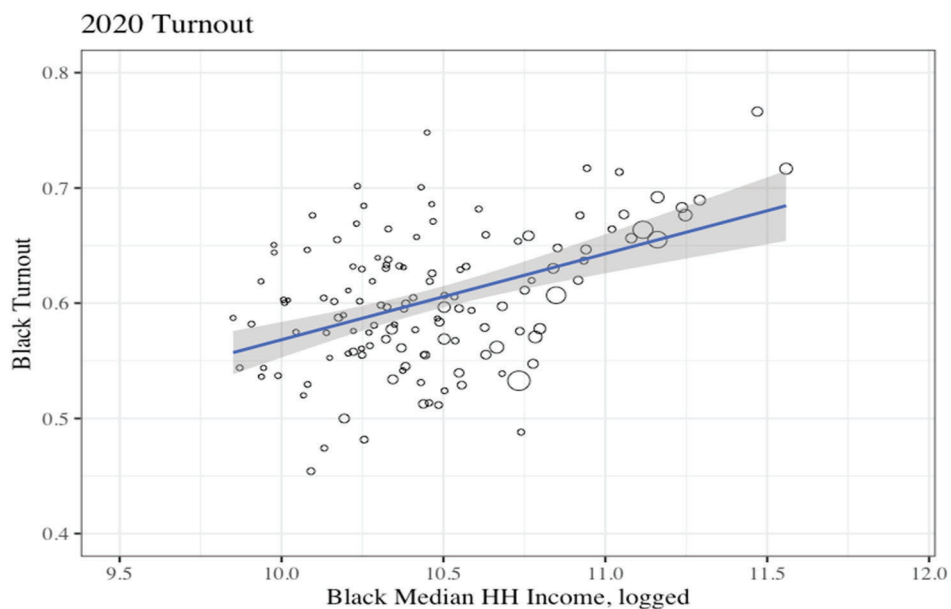


Figure 29. Association between Black median household income and 2020 Black turnout (2016-2020 ACS).

g. Replication of the Relationship Between Turnout and Socioeconomic Disparities Using 2022 General Election Data

This section replicates the analysis of Black turnout and socioeconomic disparities, as measured with the 2016-2020 ACS, using the 2022 general election data. This analysis shows that all the four socioeconomic indicators are once again statistically associated with Black turnout levels.

Starting with education, Figures 30 and 31 show that both measures of educational attainments are associated with Black turnout (at $p < 0.001$). The discrete difference between counties with the highest percentage of Black population with less than a high school degree compared to counties with the lowest percentage of Black population with less than a high school degree amount to a 12.5 [8.2, 16.7] percentage point decline in Black turnout. When comparing counties with the highest share of bachelor's degrees to those with the lowest share of a bachelor's degrees, I find a discrete difference of 13.3 [9.3, 17.3] percentage points in turnout. This means that counties with lower levels of Black education attainment have significantly lower levels of Black turnout.

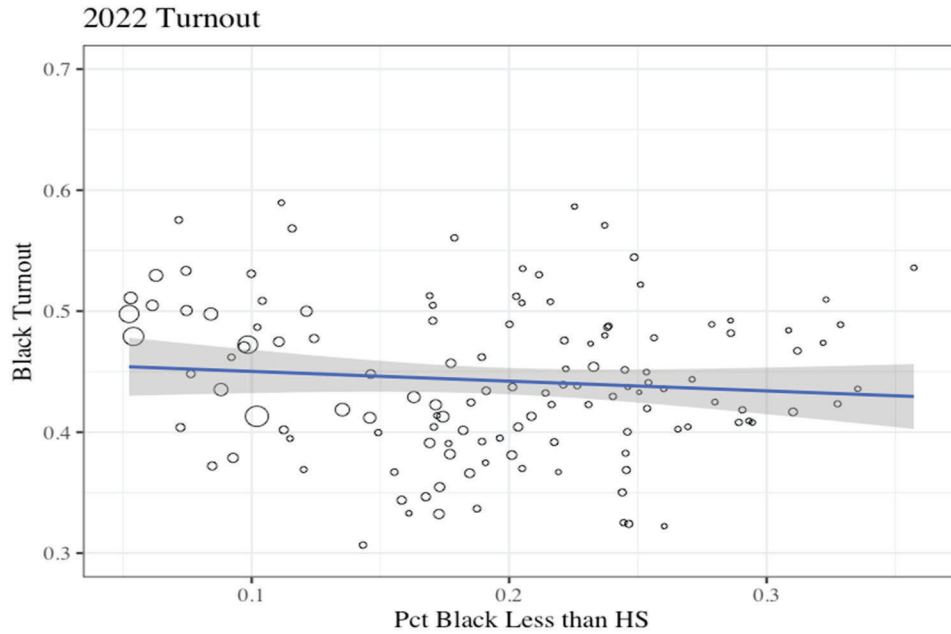


Figure 30. Association between Black less than high school education and 2022 Black turnout (2016-2020 ACS).

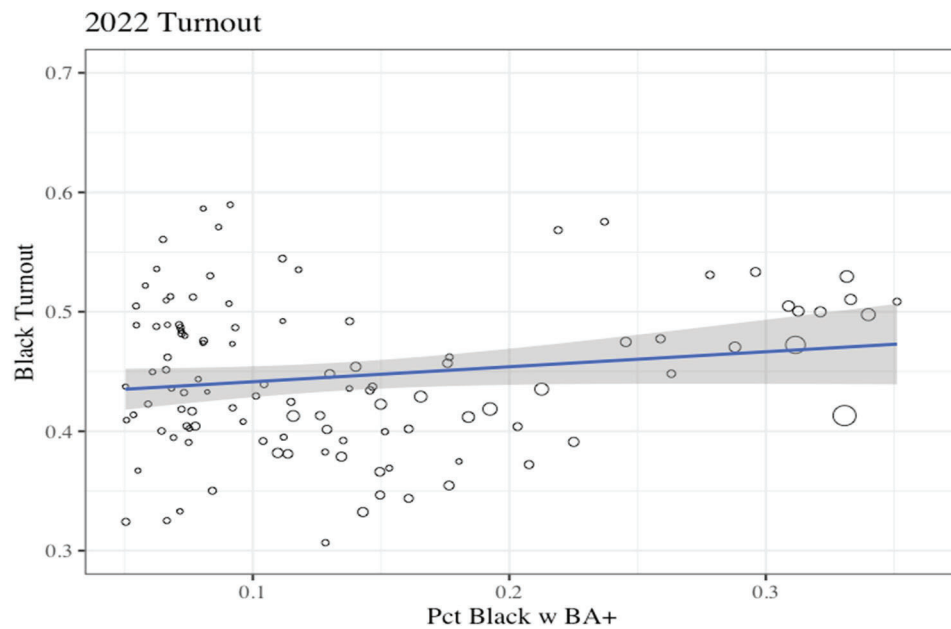


Figure 31. Association between Black 4-year degree and 2022 Black turnout (2016-2020 ACS).

Moving on to indicators of economic disparities, I find that as the percentage of counties with Blacks below the poverty line rises, Black turnout declines (see Figure 32). This relationship is statistically significant (at $p < 0.001$). Substantively, counties with the highest levels of Black poverty have a 20.4 [16.5, 24.2] percentage point *lower* Black turnout than counties with the lowest levels of Black poverty. Replacing poverty levels with median household income leads to the same

conclusion. As Figure 33 shows, logged household income is statistically associated with Black turnout. Specifically, counties with the highest Black median household income report 19.0 [15.4, 22.6] percentage point higher Black turnout than counties with the lowest median household income. In sum, this replication analysis using the 2022 general election data further underscores how socioeconomic disparities are linked to turnout levels.

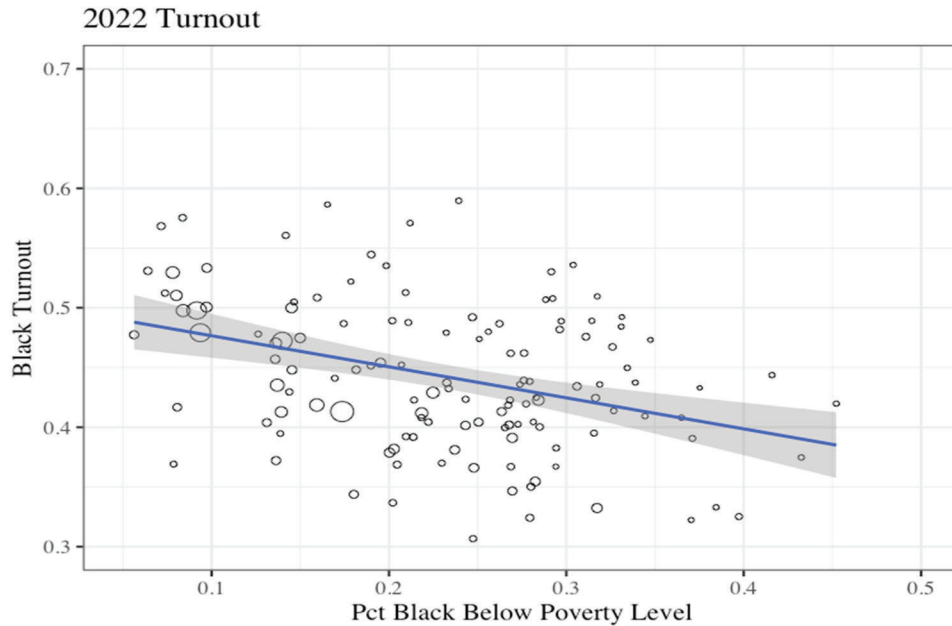


Figure 32. Association between Black poverty rates and 2022 Black turnout (2016-2020 ACS).

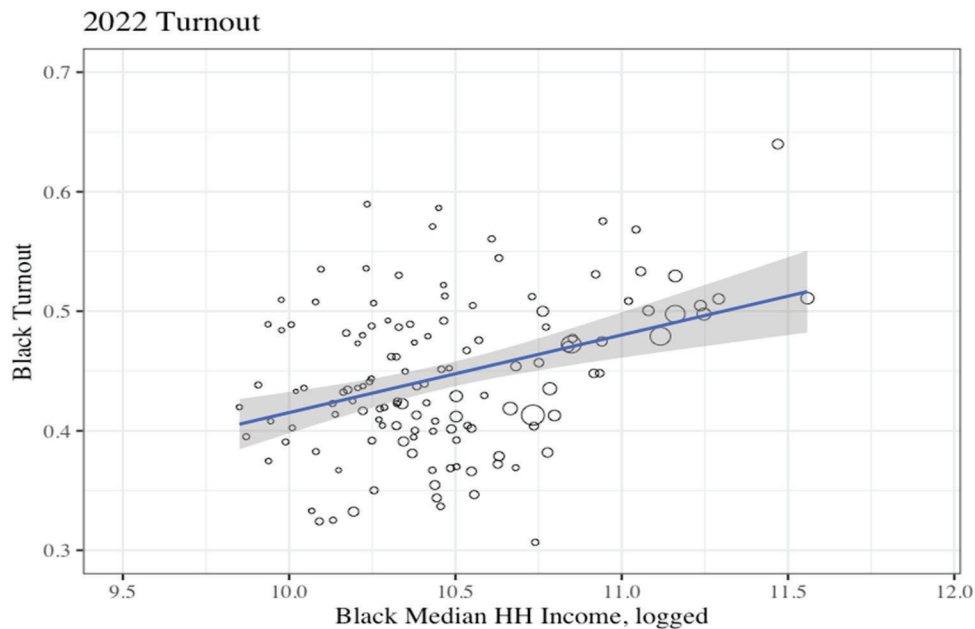


Figure 33. Association between Black median household income and 2022 Black turnout (2016-2020 ACS).

3. Other Forms of Voter Participation

This next section examines disparities between Blacks and whites among other modes of voter participation. I downloaded the 2020 Cooperative Election Study (CES) common form post-election survey.⁹ The CES is a widely used publicly available survey dataset political scientists use to write academic papers and inform our scientific knowledge of the American voter. The full dataset contains 61,000 interviews. I subset the data to Georgia respondents, of which there are 2,002. To compare white vs. Black political participation, I further subset the data to only non-Hispanic white and Black respondents. This yields a dataset of $n=1,753$. Finally, 339 individuals whom CES initially interviewed in the pre-election survey did not take the post-election survey; thus, the final dataset is $n=1,414$. All tabulations presented below include survey weights to ensure that the analysis is representative of the target audience.¹⁰

The survey asks a battery of political participation questions where respondents indicate they have (1) or have not (0) participated in such an act.

1. Attend local political meetings (such as school board or city council)
2. Put up a political sign (such as a lawn sign or bumper sticker)
3. Work for a candidate or campaign
4. Attend a political protest, march or demonstration
5. Contact a public official
6. Donate money to a candidate, campaign, or political organization

I also analyze two other yes (1) / no (0) questions related to political participation:

1. Did a candidate or political campaign organization contact you during the 2020 election?
2. Have you ever run for elective office at any level of government (local, state or federal)?

Below I present cross-tabulations between each item and race (white/Black), along with a chi-square statistical test. The cross-tabulation shows, for instance, the share of whites that participate in a particular activity vs. the share of whites that do not participate in such activity. The analysis is designed to assess whether Blacks and whites engage in political participation at different rates. If the chi-square p-value is .10, then we can say that we have 90% confidence that this relationship has not occurred by chance. In short, the lower the p-value, the more statistical confidence we have that whites and Blacks behave differently politically.

Overall, the results strongly point to relative Black disparity in political participation. In five of the eight survey items, a statistically significant relationship exists between race and political

⁹ Available at: <https://cces.gov.harvard.edu>.

¹⁰ Weighting data here has the effect of growing the sample size of the dataset to $n=1,557$ respondents.

participation (at either $p < .10$ or $p < .05$). That is, whites are more likely to say they engaged in the political activity than are Blacks.

For instance, 5.9% of whites say they attended a political meeting, whereas 3.5% of Blacks said they did ($p < 0.05$). On political signs, 17.9% of whites put one up vs. 6.5% of Blacks ($p < 0.001$). Whites are also more likely to report having worked for a candidate or campaign (3.6% vs. 1.8%, $p < 0.05$). One of the larger differences emerges on the question regarding contacting a public official. Twenty-one percent (21%) of whites say they contacted an official, whereas 8.8% of Blacks report doing so ($p < 0.001$). Differences emerge across donation behavior too: 24.4% vs. 13.6% ($p < 0.001$).

There are three questions where significant statistical differences do not emerge, although whites nonetheless engage in the political activity to a greater degree than do Blacks: political protest (whites at 6.2% vs. Blacks at 4.4%, $p = 0.142$); being contacted by a political campaign organization (61.3% vs. 61.3%, $p = 0.995$), and running for office (1.7% vs. 0.7%, $p = 0.12$).

Attend local political meetings (such as school board or city council)?

<i>Race</i>	<i>No</i>	<i>Pct. No</i>	<i>Yes</i>	<i>Pct. Yes</i>
White	954	94.08%	60	5.92%
Black	523	96.49%	19	3.51%
<i>Chi-2 = 4.262 DF = 1 P-Value = 0.039</i>				

*Table 4. Political attendance.***Put up a political sign (such as a lawn sign or bumper sticker)?**

<i>Race</i>	<i>No</i>	<i>Pct. No</i>	<i>Yes</i>	<i>Pct. Yes</i>
White	832	82.05%	182	17.95%
Black	507	93.54%	35	6.46%
<i>Chi-2 = 38.863 DF = 1 P-Value = 0</i>				

*Table 5. Political signs.***Work for a candidate or campaign?**

<i>Race</i>	<i>No</i>	<i>Pct. No</i>	<i>Yes</i>	<i>Pct. Yes</i>
White	978	96.35%	37	3.65%
Black	533	98.16%	10	1.84%
<i>Chi-2 = 3.934 DF = 1 P-Value = 0.0473</i>				

*Table 6. Campaign work.***Attend a political protest, march, or demonstration?**

<i>Race</i>	<i>No</i>	<i>Pct. No</i>	<i>Yes</i>	<i>Pct. Yes</i>
White	951	93.79%	63	6.21%
Black	519	95.58%	24	4.42%
<i>Chi-2 = 2.155 DF = 1 P-Value = 0.1421</i>				

Table 7. Political protest.

Contact a public official?

<i>Race</i>	<i>No</i>	<i>Pct. No</i>	<i>Yes</i>	<i>Pct. Yes</i>
White	801	78.99%	213	21.01%
Black	495	91.16%	48	8.84%
<i>Chi-2 = 37.513 DF = 1 P-Value = 0</i>				

*Table 8. Contacting officials.***Donate money to a candidate, campaign, or political organization?**

<i>Race</i>	<i>No</i>	<i>Pct. No</i>	<i>Yes</i>	<i>Pct. Yes</i>
White	767	75.64%	247	24.36%
Black	469	86.37%	74	13.63%
<i>Chi-2 = 24.882 DF = 1 P-Value = 0</i>				

*Table 9. Political donations.***Did a candidate or political campaign organization contact you during the 2020 election?**

<i>Race</i>	<i>No</i>	<i>Pct. No</i>	<i>Yes</i>	<i>Pct. Yes</i>
White	392	38.66%	622	61.34%
Black	210	38.67%	333	61.33%
<i>Chi-2 = 0 DF = 1 P-Value = 0.9953</i>				

Table 10. Campaign contacts.

Have you ever run for elective office at any level of government (local, state or federal)?

<i>Race</i>	<i>No</i>	<i>Pct. No</i>	<i>Yes</i>	<i>Pct. Yes</i>
White	986	98.31%	17	1.69%
Black	539	99.26%	4	0.74%
<i>Chi-2 = 2.414 DF = 1 P-Value = 0.1202</i>				

Table 11. Running for office.

All told, the results are compelling: White Georgians engage in a wide range of political activity at higher rates than Black Georgians, including activities like donating to campaigns, contacting public officials, and posting political signs. And as the academic literature discussed earlier in this report shows, these differences are directly attributable to socioeconomic disparities in health, education, and income.

Conclusion

The picture these data paint is straightforward: Black Georgians experience significant disparities in income, education, and health compared to non-Hispanic white Georgians. And these disparities cause Black Georgians to be less likely to participate effectively in the political process as measured by voter turnout and other forms of voter participation like making political donations, engaging elected officials, and even running for office. These trends are in accord with overwhelming academic literature showing that Blacks suffer socioeconomic disparities and so are therefore less likely than whites to participate in the political process. These findings therefore provide strong evidence for the presence of Senate Factor 5 in the state of Georgia.

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Loren Collingwood

University of New Mexico
Department of Political Science
1 University of New Mexico
Albuquerque, NM 87131

Office: (951) 827-5590
Email: 1collingwood@unm.edu
website: <http://www.collingwoodresearch.com>

Employment

Associate Professor, University of New Mexico, 2020 - Present
Associate Professor, University of California, Riverside 2019 - 2020
Assistant Professor, University of California, Riverside 2012 - 2019
Assistant Analyst, Greenberg Quinlan Rosner, Washington DC 2005-2007
Field Associate, Greenberg Quinlan Rosner, Washington DC 2003-2005

Education

Ph.D., Political Science, University of Washington 2007 - 2012
Committee: Matt Barreto (chair), Chris Parker, Luis Fraga, Chris Adolph, Peter Hoff
M.A., Political Science, University of Washington, 2009
B.A., Psychology, California State University, Chico, 1998 - 2002
Minor: Political Science
Honors: *Cum Laude*, NCAA Scholar-Athlete in soccer

Research Fields

American Politics, Political Behavior, Methods, Race and Ethnic Politics, Immigration

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12. Newman, Ben, Sono Shah, and **Loren Collingwood**. 2018. "Race, Place, and Building a Base: Ethnic Change, Perceived Threat, and the Nascent Trump Campaign for President." *Public Opinion Quarterly*. 82(1): 122-134.

Featured in Pacific Standard; LSE Blog; Newsweek
11. Skulley, Carrie, Andrea Silva, Marcus J. Long, **Loren Collingwood**, and Ben Bishin, "Majority Rule vs. Minority Rights: Immigrant Representation Despite Public Opposition on the 1986 Immigration Reform and Control Act." 2018. *Politics of Groups and Identities*. 6(4): 593-611.
10. Alamillo, Rudy and **Loren Collingwood**. 2017. "Chameleon Politics: Social Identity and Racial Cross-Over Appeals." *Politics of Groups and Identities*. 5(4): 533-650.

Featured in WaPo's Monkey Cage; NBC News; Los Angeles Times
9. **Collingwood, Loren**, Kassra Oskooii, Sergio Garcia-Rios, and Matt Barreto. 2016. "eiCompare: Comparing ecological inference estimates across EI and EI:RxC." *The R Journal*. 8(2): 92-101.

Featured in Investigate West
8. Barreto, Matt, **Loren Collingwood**, Christopher Parker, and Francisco Pedraza. 2015. "Racial Attitudes and Race of Interviewer Item Non-Response." *Survey Practice*. 8:5.

7. Barreto, Matt and **Loren Collingwood**. 2015. "Group-based Appeals and the Latino Vote in 2012: How Immigration Became a Mobilizing Issue." *Electoral Studies*. 40:490-499.

Featured in Latino Decisions blog

6. **Collingwood, Loren**, Matt Barreto, and Sergio Garcia-Rios. 2014. "Revisiting Latino Voting: Cross-Racial Mobilization in the 2012 Election." *Political Research Quarterly*. 67(3): 632-645.

Featured in LSE Blog

5. Jurka, Tim, **Loren Collingwood**, Amber Boydston, Emiliano Grossman, and Wouter van Atteveldt. 2013. "RTextTools: A Supervised Learning Package for Text Classification in R" *The R Journal*. 5(1).
4. **Collingwood, Loren**. 2012. "Education Levels and Support for Direct Democracy." *American Politics Research*, 40(4): 571-602.
3. **Collingwood, Loren** and John Wilkerson. 2012. "Tradeoffs in Accuracy and Efficiency in Supervised Learning Methods." *Journal of Information Technology and Politics*, 9(3).
2. **Collingwood, Loren**, Matt Barreto and Todd Donovan. 2012. "Early Primaries, Viability, and Changing Preferences for Presidential Candidates." *Presidential Studies Quarterly*, 42(2).
1. Barreto, Matt, **Loren Collingwood**, and Sylvia Manzano. 2010. "A New Measure of Group Influence in Presidential Elections: Assessing Latino Influence in 2008." *Political Research Quarterly*. 63(4).

Featured in Latino Decisions blog

Book Chapters

11. **Collingwood, Loren**, Stephanie DeMora, and Sean Long. "Demographic Change, White Decline, and the Changing Nature of Racial Politics in Election Campaigns." In *Cambridge Handbook in Political Psychology*. Edited by Danny Osborne and Chris Sibley. [Forthcoming].
10. Morín, Jason L. and **Loren Collingwood**. "Contractor Politics: How Political Events Influence Private Prison Company Stock Shares in the Pre and Post Trump Era." In *Anti-immigrant Rhetoric, Actions, and Policies during the Trump Era (2017-2019)*. [Forthcoming]
9. Parker, Christopher S., Christopher C. Towler, **Loren Collingwood**, and Kassra Oskooii. 2020. "Race and Racism in Campaigns." In *Oxford Encyclopedia of Persuasion in Political Campaigns*. Edited by Elizabeth Suhay, Bernard Grofman, and Alexander H. Trechsel. DOI: 10.1093/oxfordhb/9780190860806.013.38
8. **Collingwood, Loren**, and DeMora, Stephanie. 2019. "Latinos and Obama." In Jessica Lavariega Monforti (ed.) *Latinos in the American Political System: An Encyclopedia of Latinos as Voters, Candidates, and Office Holders*.
7. DeMora, Stephanie, and **Collingwood, Loren**. 2019. "George P. Bush." In Jessica Lavariega Monforti (ed.) *Latinos in the American Political System: An Encyclopedia of Latinos as Voters, Candidates, and Office Holders*.

6. El-Khatib, Stephen Omar, and **Collingwood, Loren**. 2019. "Ted Cruz." In Jessica Lavariega Monforti (ed.) *Latinos in the American Political System: An Encyclopedia of Latinos as Voters, Candidates, and Office Holders*.
 5. **Collingwood, Loren**, Sylvia Manzano and Ali Valenzuela. 2014. "November 2008: The Latino vote in Obama's general election landslide." In *Latino America: How America's Most Dynamic Population Is Poised to Transform the Politics of the Nation*. By Matt Barreto and Gary Segura. New York: Public Affairs Press. (co-authored chapter with Matt Barreto and Gary Segura)
 4. **Collingwood, Loren**, Justin Gross and Francisco Pedraza. 2014. "A 'decisive voting bloc' in 2012." In *Latino America: How America's Most Dynamic Population Is Poised to Transform the Politics of the Nation*. By Matt Barreto and Gary Segura. New York: Public Affairs Press. (co-authored chapter with Matt Barreto and Gary Segura)
 3. Barreto, Matt, **Loren Collingwood**, Ben Gonzalez, and Chris Parker. 2011. "Tea Party Politics in a Blue State: Dino Rossi and the 2010 Washington Senate Election." In William Miller and Jeremy Walling (eds.) *Stuck in the Middle to Lose: Tea Party Effects on 2010 U.S. Senate Elections*. Rowan and Littlefield Publishing Group.
 2. **Collingwood, Loren** and Justin Reedy. "Criticisms of Deliberative Democracy." In Nabatchi, Tina, Michael Weiksner, John Gastil, and Matt Leighninger, eds., *Democracy in motion: Evaluating the practice and impact of deliberative civic engagement*. New York: Oxford University Press, 2010.
 1. **Collingwood, Loren**. "Initiatives." In Haider-Markel, Donald P., and Michael A. Card. *Political Encyclopedia of U.S. States and Regions*. Washington, DC: CQ Press, 2009.
-

Software

R package: **RTextTools**. This package uses supervised learning methods to automate text classification. Coauthors include Jurka, Boydston, Grossman, and van Atteveldt. Available on CRAN.

R package: **eiCompare**. This package compares outcomes between ecological inference (EI) estimates and EI:Rows by Columns (RxC) estimates. Primary purpose is employed in racially polarized voting analysis. Development Version available here: [eiCompare](#) or on CRAN. Coauthors include Barreto, Oskooii, Garcia-Rios, Burke, Decter-Frain, Murayama, Sachdeva, Henderson, Wood, and Gross.

R package: **Rvoterdistance**. Calculates distance between voters and multiple polling locations and/or ballot drop boxes. Ports C++ code for high speed efficiency. Available on CRAN.

R package: **Rweights**. Creates survey weights via iterative variable raking. Survey design object and weights vector are produced for use with R, Stata, and other programs. Currently in alpha form with unix tarball available here: [Rweights](#).

R package: **Rmturkcheck**. Functions for cleaning and analyzing two-wave MTurk (or other) panel studies. Available: [Rmturkcheck](#)

R package: **RCopyFind**. Functions for extracting data frames then plotting results from WCopyFind plagiarism text program. Co-authored with and Maintained by Steph DeMora. Available: [RCopyFind](#)

Under Review / Working Papers

Barreto, Matt, Michael Cohen, **Loren Collingwood**, Chad Dunn, and Sonni Waknin. “Using Bayesian Improved Surname Geocoding (BISG) to Assess Racially Polarized Voting in Voting Rights Act Challenges.” [Revise & Resubmit]

Decter-Frain, Ari, Pratik Sachdeva, **Loren Collingwood**, Juandalyn Burke, Hikari Murayama, Matt Barreto, Scott Henderson, Spencer Wood, and Joshua Zingher. “Comparing BISG to CVAP Estimates in Racially Polarized Voting Analyses.” [Revise & Resubmit]

Hickel Jr., Flavio R., Kassra A.R. Oskooii, and **Loren Collingwood**. “Social Mobility Through Immigrant Resentment: Explaining Latinx Support for Restrictive Immigration Policies and Anti-Immigrant Candidates.” [Revise & Resubmit]

Collingwood, Loren, Jason Morín, and Edward Vargas. “Protesting Detention: How Protests Activated Group Empathy and Party ID to Shift Attitudes on Child Detention.” [Working Paper]

Paarlberg, Michael A. and **Loren Collingwood**. “Fact or Fiction: Testing the link between local immigration policy and the MS-13 ‘Threat’.” [Working Paper]

Awards, Grants, and Fellowships

Matt Barreto and Loren Collingwood. Detection of Vote Dilution: New tools and methods for protecting voting rights. Data Science for Social Good project selection, University of Washington. 2020

Loren Collingwood. Measuring Cross-Racial Voter Preferences. UCR Faculty Senate. \$3,500. 2019.

Francisco Pedraza and Loren Collingwood. Evaluating AltaMed’s 2018 GOTV Efforts in Los Angeles. \$12,000. 2018-2019.

Allan Colbern, Loren Collingwood, Marcel Roman. A Mess in Texas: The Deleterious Effects of SB4 on Public Trust in Law Enforcement. Center for American Progress. \$7,100. 2018.

Karthick Ramakrishnan, Mindy Romero, Loren Collingwood, Francisco Pedraza, Evaluating California’s Voter’s Choice Act. Irvine Foundation. \$150,000, 2018-2019.

William McGuire, Loren Collingwood, Ben Gonzalez O’Brien, and Katie Baird, “Evaluating the Impact of Drop Boxes and Get-Out-The-Vote Advertising on Voter Turnout in Pierce County, WA.” MIT Election Data and Science Lab, \$16,365, 2017

Justin Freebourn and Loren Collingwood, Blum Initiative \$4,000, 2017

Hellman Fellowship Grant, UC Riverside, \$30,000, 2014-2015

Best Dissertation Award, 2013 Western Political Science Association

UC Riverside Harrison & Ethel Silver Fund, \$2,000, 2013

Best Graduate Student Paper Award State Politics section, 2012 American Political Science Association

Texas A&M Experimental Methods Winter Institute, \$800, January, 2011

UseR! 2011 Conference travel grant, \$1000, August, 2011

Center for Statistics and the Social Sciences travel grant, \$870, January, 2011

David J. Olson Research Grant, University of Washington Political Science, \$2,000, January, 2011

Warren Miller Scholarship Award, Inter-University Consortium for Political and Social Research, Summer 2009

Matthews Fellowship, University of Washington, Winter 2008 - Spring 2009

Brennan Center for Justice, New York University [with Matt Barreto]

Indiana Voter Identification Study, \$40,000 – Oct. 2007, 6 months

Teaching Experience

POSC 10 (American Politics); POSC 146 (Mass Media & Public Opinion); POSC 171 (State Politics); POSC 104S (Race and Ethnic Politics Special Topics); POSC 108 (Race and Ethnic Politics)

POLS 300: Immigration Politics with Focus on Latino Politics

POLS 300: The Voting Rights Act: Causes and Effects

POSC 202A: Introduction to Quantitative Methods (Graduate)

POSC 207: Statistical Programming and Data Science for the Social Sciences (Graduate)

POSC 207: Quantitative Text Analysis (Graduate)

POSC 220: Graduate Seminar in Race and Ethnic Politics in the U.S.

POSC 256: Graduate Seminar in Public Opinion

POSC 253: Graduate Seminar in Electoral Politics

Text Classification with R using the `RTextTools` package, UNC-Chapel Hill Workshop

Text Analysis with Political Data, Claremont Graduate School, 2019

CSSS Intermediate R Workshop 2011, Instructor (Summer)

POLS 501: Advanced Research Design and Analysis, Teaching Assistant (2 quarters)

ICPSR Summer Course: Methodological Issues in Quantitative Research on Race and Ethnicity, Teaching Assistant

POLS 202: Introduction to American Politics, Teaching Assistant

CSSS Math Camp 2011, Teaching Assistant

POLS 499D: Center for American Politics and Public Policy Undergraduate Honors Seminar (2 quarters)

Professional Service

Co-editor, *Politics of Groups and Identities*, 2020-2021

Reviewer, Political Behavior, Journal of Information Technology and Politics, American Politics Research, Social Sciences Quarterly, Journal of Politics, Politics of Groups and Identities, American Journal of Political Science, Political Research Quarterly, State Politics and Public Policy, American Political Science Review, British Journal of Political Science, Journal of Race and Ethnic Politics, Urban Studies, Urban Affairs Review; many other journals

Conference Papers and Presentations

Collingwood, Loren and Benjamin Gonzalez O'Brien. "Sanctuary Cities: The Politics of Refuge." Invited Talk California Lutheran University. (October 2020).

Collingwood, Loren. "Sanctuary Cities: The Politics of Refuge." Invited Talk California State University, Chico. (March 2020).

Collingwood, Loren. "Sanctuary Cities: The Politics of Refuge." Invited Talk Humboldt State University. (March 2020).

Collingwood, Loren. "Campaigning in a Racially Diversifying America: Whether and How Cross-Racial Electoral Mobilization Works." Invited Talk Oregon State University. (February 2020).

Collingwood, Loren and Benjamin Gonzalez O'Brien. "Sanctuary Cities: The Politics of Refuge." Invited Talk University of San Diego. (November 2019).

Collingwood, Loren. "Campaigning in a Racially Diversifying America: Whether and How Cross-Racial Electoral Mobilization Works." Invited Talk University of Massachusetts. (January 2020).

Collingwood, Loren. "Campaigning in a Racially Diversifying America: Whether and How Cross-Racial Electoral Mobilization Works." Invited Talk University of New Mexico. (December 2019).

Collingwood, Loren and Benjamin Gonzalez O'Brien. "Sanctuary Cities: The Politics of Refuge." Invited Talk California State University, Northridge, Los Angeles. (November 2019).

Collingwood, Loren and Benjamin Gonzalez O'Brien. "Sanctuary Cities: The Politics of Refuge." Invited Talk Occidental College, Los Angeles. (November 2019).

Collingwood, Loren (with Sean Long). "Can States Promote Minority Representation? Assessing the Effects of the California Voting Rights Act." UC Irvine Critical Observations on Race and Ethnicity Conference. (November 2019).

Collingwood, Loren. "Sanctuary Cities: The Politics of Refuge." Invited Talk University of Geneva, Switzerland. (November 2019).

Collingwood, Loren. "Sanctuary Cities: The Politics of Refuge." Invited Talk University of Bern, Switzerland. (October 2019).

Collingwood, Loren. "Sanctuary Cities: The Politics of Refuge." Invited Talk ETH Zurich, Switzerland. (October 2019).

Collingwood, Loren. "Sanctuary Cities: The Politics of Refuge." Invited Talk London School of Economics, U.K. (October 2019).

Collingwood, Loren. "Sanctuary Cities: The Politics of Refuge." Invited Talk University of Leeds, U.K. (October 2019).

Valenzuela, Ali, Kassra Oskooi, and Loren Collingwood. "Threat or Reassurance? Framing Midterms Results among Latinos and Whites." American Political Science Association, Washington, DC. (August 2019).

Paarlberg, Michael A. and Loren Collingwood. "Much Ado about Nothing: Local Immigration Policy and the MS-13 'Threat' ." American Political Science Association, Washington, DC. (August 2019).

Collingwood, Loren. "A Mess in Texas: The Deleterious Effects of SB4 on Public Trust in Law Enforcement." International Center for Local Democracy (ICLD) Conference on Local Democracy. Umea, Sweden (June 2019).

Collingwood, Loren. "The #FamiliesBelongTogether Outcry: How Protests Shifted Attitudes on Immigrant Family Separation and Child Detention." Invited Talk University of California, Irvine (May 2019).

Collingwood, Loren. "Text Analysis with R." Invited talk and presentation. Claremont Graduate University (May 2019)

Collingwood, Loren. "The #FamiliesBelongTogether Outcry: How Protests Shifted Attitudes on Immigrant Family Separation and Child Detention." PRIEC. UC Davis (May 2019).

Collingwood, Loren. "Data Analysis with R." Invited presentation and training Cal Poly Pomona (May 2019)

Collingwood, Loren. "The #FamiliesBelongTogether Outcry: How Protests Shifted Attitudes on Immigrant Family Separation and Child Detention." Invited Talk Northern Arizona University (May 2019)

Collingwood, Loren (with Jason Morín). "Contractor Politics: How Political Events Influence Private Prison Company Stock Shares in the Pre and Post Trump Era." Invited Talk Universidad Nacional Autonoma de Mexico, Distrito Federal, Mexico (February 2019).

Roman, Marcel, Allan Colbern, and Loren Collingwood. "A Mess in Texas: The Deleterious Effects of SB4 on Public Trust in Law Enforcement." PRIEC Consortium. University of Houston (December 2018)

Collingwood, Loren. "The #FamiliesBelongTogether Outcry: How Protests Shifted Attitudes on Immigrant Family Separation and Child Detention." Invited Talk University of Illinois Chicago (November 2018)

Collingwood, Loren. "Ongoing Research in Sanctuary Cities and Immigration Politics." Invited Talk University of Pennsylvania Perry World House (November 2018)

Collingwood, Loren. "Unfair Detention: How Protests Activated Racial Group Empathy to Shift Attitudes on Child Detention." Invited Talk Rutgers University (October 2018)

Collingwood, Loren. "Unfair Detention: How Protests Activated Racial Group Empathy to Shift Attitudes on Child Detention." UCR Alumni Research Presentation Washington and Philadelphia (October 2018)

Collingwood, Loren, Jason Morin. "Expanding Carceral Markets: Detention Facilities, ICE Contracts, and the Financial Interests of Punitive Immigration Policy." Invited Talk UCLA (October 2018).

Collingwood, Loren, Nazita Lajevardi, and Kassra Oskooii. "Opinion Shift and Stability: Enduring Opposition to Trump's "Muslim Ban". APSA (September 2018).

Collingwood, Loren, Jason Morin, and Stephen Omar El-Khatib. "Expanding Carceral Markets: Detention Facilities, ICE Contracts, and the Financial Interests of Punitive Immigration Policy." American Political Science Association Conference (August 2018).

Collingwood, Loren, Sergio Garcia-Rios, and Hannah Walker. "The Impact of Exposure to Police Brutality on Political Attitudes Among Black and White Americans." Cooperative Comparative Post-Election Survey (CMPS) Conference. (August, 2018).

Collingwood, Loren, Nazita Lajevardi, and Kassra Oskooii. "Opinion Shift and Stability: Enduring Opposition to Trump's "Muslim Ban". Politics of Race Immigration and Ethnicity Consortium (August 2018).

Collingwood, Loren, Jason Morin, and Stephen Omar El-Khatib. "Expanding Carceral Markets: Detention Facilities, ICE Contracts, and the Financial Interests of Punitive Immigration Policy." Politics of Race Immigration and Ethnicity Consortium, Michigan State University (April 2018)

Collingwood, Loren, Benjamin Gonzalez O'Brien, and Joe Tafoya. "Partisan Learning or Racial Learning: Opinion Change on Sanctuary City Policy Preferences in California and Texas." Midwest Political Science Association Conference (April 2018).

El-Khatib, Stephen Omar and Loren Collingwood. "State Policy Responses to Sanctuary Cities: Explaining the Rise of Sanctuary City Legislative Proposals." Midwest Political Science Association Conference (April 2018).

Hannah Walker, Loren Collingwood, and Tehama Lopez Bunyasi. "Under the Gun: Black Responsiveness and White Ambivalence to Racialized Black Death." Midwest Political Science Association Conference (April 2018).

Hannah Walker, Loren Collingwood, and Tehama Lopez Bunyasi. "Under the Gun: Black Responsiveness and White Ambivalence to Racialized Black Death." Western Political Science Association Conference (April 2018).

DeMora, Stephanie, Adriana Ninci, and Loren Collingwood. "Shoot First in ALEC's Castle: The Diffusion of Stand Your Ground Laws." Politics of Race Immigration and Ethnicity Consortium, ASU (February 2018).

El-Khatib, Stephen Omar and Loren Collingwood. "State Policy Responses to Sanctuary Cities: Explaining the Rise of Sanctuary City Legislative Proposals." Politics of Race Immigration and Ethnicity Consortium, UCR (September 2017).

Collingwood, Loren, Nazita Lajevardi, and Kassra Oskooii. "A Change of Heart? How Protests Shifted Individual-Level Public Opinion on Trump's Muslim Ban." APSA (September 2017).

Collingwood, Loren, McGuire, Will, Gonzalez O'Brien Ben, Hampson, Sarah, and Baird, Katie. "Do Dropboxes Improve Voter Turnout? Evidence from King County, Washington." APSA (September 2017).

Collingwood, Loren, Reny, Tyler, Valenzuela, Ali. "Flipping for Trump: In 2016, Immigration and Not Economic Anxiety Explains White Working Class Vote Switching." UCLA (May 2017).

Collingwood, Loren, Nazita Lajevardi, and Kassra Oskooii. "A Change of Heart? How Protests Shifted Individual-Level Public Opinion on Trump's Muslim Ban." UCLA (May 2017).

Collingwood, Loren, Nazita Lajevardi, and Kassra Oskooii. "A Change of Heart? How Protests Shifted Individual-Level Public Opinion on Trump's Muslim Ban." Politics of Race Immigration and Ethnicity Consortium, UCSB (May 2017).

Reny, Tyler, Ali Valenzuela, and Loren Collingwood. "Public Reactions to Anti-Latino Appeals in the Age of Obama: Race, Illegality and Changing Norms." Vancouver, Western Political Science Association Conference (April. 2017).

Collingwood, Loren, McGuire, Will, Gonzalez-O'Brien Ben, Hampson, Sarah, and Baird, Katie. "Do Dropboxes Improve Voter Turnout? Evidence from King County, Washington." WPSA (April 2017).

Gonzalez-O'Brien, Benjamin, Loren Collingwood, and Stephen El-Khatib. "Gimme Shelter: The Myth and Reality of the American Sanctuary City". Vancouver, Western Political Science Association Conference WPSA (April 2017).

Rush, Tye, Pedraza, Francisco, Collingwood, Loren. "Relieving the Conscience: White Guilt and Candidate Evaluation." Politics of Race Immigration and Ethnicity Consortium, UCI (March 2017).

Reny, Tyler, Ali Valenzuela, and Loren Collingwood. "Public Reactions to Anti-Latino Appeals in the Age of Obama: Race, Illegality and Changing Norms." Philadelphia, American Political Science Association Conference (Sept. 2016)

Barreto, Matt, Loren Collingwood, Sergio Garcia-Rios, and Kassra Oskooii. "Estimating Candidate Support: Comparing EI & EI-RxC." Chicago, Midwest Political Science Association Conference (April 2016)

Bishin, Benjamin, Loren Collingwood, and Erinn Lauterbach. "Cross-Racial Mobilization in a Rapidly Diversifying Polity: Latino Candidates and Anglo Voters" Chicago, Midwest Political Science Association Conference (April 2016)

Gonzalez-O'Brien, Benjamin, Loren Collingwood, and Stephen El-Khatib. "Gimme Shelter: The Myth and Reality of the American Sanctuary City". San Diego, Western Political Science Association Conference (April 2016)

Collingwood, Loren and Antoine Yoshinaka. The new carpetbaggers? Analyzing the effects of migration on Southern politics. The Citadel Conference on Southern Politics, Charleston, SC (Mar 2016)

Alamillo, Rudy and Loren Collingwood. Chameleon Politics: Social Identity and Racial Cross-Over Appeals. American Political Science Association Conference, San Francisco (Sept 2015)

Reny, Tyler, Ali Valenzuela, and Loren Collingwood. "Public Reactions to Anti-Latino Appeals in the Age of Obama: Race, Illegality and Changing Norms." San Francisco, American Political Science Association Conference (Sept 2015)

Alamillo, Rudy and Loren Collingwood. Chameleon Politics: Social Identity and Racial Cross-Over Appeals. Western Political Science Association Conference, Las Vegas (April 2015)

Barreto, Matt and Loren Collingwood. Confirming Electoral Change: The 2012 U.S. Presidential Election OSU Conference (October, 2013). "Earning and Learning the Latino Vote in 2008 and 2012: How the Obama Campaign Tried, Refined, Learned, and Made Big Steps in Cross-Racial Mobilization to Latinos.

Collingwood, Loren and Ashley Jochim. 2012 Midwest Political Science Association Annual Conference (April) Chicago, IL. "Electoral Competition and Latino Representation: The Partisan Politics of Immigration Policy in the 104th Congress."

Collingwood, Loren. 2012 Western Political Science Association Annual Conference (March) Portland, OR. "The Development and Use of Cross-Racial Mobilization as Campaign Strategy in U.S. Elections: The Case of Texas 1948-2010."

Collingwood, Loren. 2012 Institute for Pragmatic Practice Annual Conference (March) Seattle, WA. "Changing Demographics, Rural Electorates, and the Future of American Politics."

Collingwood, Loren. 2012 Politics of Race, Immigration, and Ethnicity Consortium (January) Riverside, CA. "The Development of Cross-Racial Mobilization: The Case of Texas 1948-2010."

Collingwood, Loren. 2011 American Political Science Association Annual Conference (September) Seattle, WA. "The Pursuit of Victory and Incorporation: Elite Strategy, Group Pressure, and Cross Racial Mobilization."

Forman, Adam and Loren Collingwood. 2011 American Political Science Association Annual Conference (September) Seattle, WA. "Measuring Power via Presidential Phone Records." (Poster)

Collingwood, Loren with (Tim Jurka, Wouter Van Attevelde, Amber Boydstun, and Emiliano Grossman). UseR! 2011 Conference. (August) Coventry, United Kingdom. "RTextTools: A Supervised Learning Package for Text Classification in R."

Jurka, Tim, Loren Collingwood, Wouter Van Attevelde, Amber Boydstun, and Emiliano Grossman. 2011 Comparative Agendas Project Conference. (June) Catania, Italy. "RTextTools: A Supervised Learning Package for Text Classification in R."

Collingwood, Loren and John Wilkerson. 2011 Journal of Information Technology & Politics Conference. (May) Seattle, WA. "Tradeoffs in Accuracy and Efficiency in Supervised Learning Methods."

Collingwood, Loren. 2011 Politics of Race, Immigration, and Ethnicity Consortium (May) Davis, CA. "The Pursuit of Victory and Incorporation: Elite Strategy, Group Pressure, and Cross Racial Mobilization"

Collingwood, Loren. 2011 Western Political Science Conference (April) San Antonio, TX. "Race-Matching as Targeted Mobilization."

Collingwood, Loren. 2011 Western Political Science Conference (April) San Antonio, TX. "The Pursuit of Victory and Incorporation: Elite Strategy, Group Pressure, and Cross Racial Mobilization"

Collingwood, Loren (with John Wilkerson). Invited Talk: Texas A&M University. (April, 2011) "Tradeoffs in Accuracy and Efficiency in Supervised Learning Methods."

Collingwood, Loren (with John Wilkerson). Invited Talk: Rice University. (April, 2011) "Tradeoffs in Accuracy and Efficiency in Supervised Learning Methods."

Collingwood, Loren. 2011 Midwest Political Science Association Annual Conference (April) Chicago, IL. "Race-Matching as Targeted Mobilization."

Collingwood, Loren and John Wilkerson. 2011 Text as Data Conference. (March) Evanston, IL. "Tradeoffs in Accuracy and Efficiency in Supervised Learning Methods."

Collingwood, Loren and John Wilkerson. 2011 Southern Political Science Conference. (January) New Orleans, LA. "Tradeoffs in Accuracy and Efficiency in Supervised Learning Methods."

Collingwood, Loren (with Ben Gonzalez). 2010 American Political Science Association Annual Conference. (September) Washington, DC. "The Political Process in Florida: Modeling African American Registration Rates Post *Smith v. Allwright*, 1944-1964."

Wilkerson, John, Steve Purpura, and Loren Collingwood. 2010 NSF Funded Tools for Text Workshop. (June) Seattle, WA. "Rtexttools: A Supervised Machine Learning Package in an R-Wrapper."

Collingwood, Loren and Marcela Garcia-Castanon. 2010 Western Political Science Association Annual Conference. (April) San Francisco, CA. "Negativity as a Tool: candidate poll standing and attack politics."

Collingwood, Loren. 2010 Politics of Race, Immigration, and Ethnicity Consortium. (January) Riverside, CA. "White Outreach: A spatial approach to modeling black incorporation in Florida post *Smith v. Allwright*, 1944-1965."

Collingwood, Loren. 2009 Western Political Science Association Annual Conference. (March) Vancouver, BC. "Levels of Education, Political Knowledge and Support for Direct Democracy."

Collingwood, Loren. 2009 Western Political Science Association Annual Conference. (March) Vancouver, BC. "The Negativity Effect: Psychological underpinnings of advertising recall in modern political campaigns."

Collingwood, Loren and Marcela Garcia-Castanon. 2009 Western Political Science Association Annual Conference. (March) Vancouver, BC. "Negativity as a Tool: predicting negative responses and their effectiveness in the 2008 campaign season."

Collingwood, Loren and Marcela Garcia-Castanon. 2009 Western Political Science Association Annual Conference. (March) Vancouver, BC. "Switching codes: analyzing Obama's strategy for addressing Latinos in the 2008 presidential campaign."

Collingwood, Loren, (with Matt Barreto and Sylvia Manzano) 2009 Shambaugh Conference. (March) University of Iowa, IA. "More than one way to shuck a tamale: Latino influence in the 2008 general election."

Collingwood, Loren and Marcela Garcia-Castanon. 2009 Midwest Political Science Association Annual Conference. (April) Chicago, IL. "Switching codes: analyzing Obama's strategy for addressing Latinos in the 2008 presidential campaign."

Collingwood, Loren and Marcela Garcia-Castanon. 2009 Pacific Northwest Political Science Conference. (October) Victoria, BC. "Negativity as a Tool: predicting negative responses and their effectiveness in the 2008 campaign season."

Collingwood, Loren and Francisco Pedraza (with Matt Barreto and Chris Parker). 2009 Center for Statistics and the Social Sciences 10th Anniversary Conference. (May) Seattle, WA. "Race of interviewer effects: perceived versus actual."

Collingwood, Loren (with Matt Barreto, Chris Parker, and Francisco Pedraza). 2009 Pacific Northwest Political Science Conference. (October) Victoria, BC. "Race of interviewer effects: perceived versus actual."

Barreto, Matt, Loren Collingwood and Todd Donovan. 2008 Midwest Political Science Association Annual Conference. (April) Chicago, IL. "Early Presidential Primaries, Viability, and Vote Switching in 2008."

Collingwood, Loren. 2008 Midwest Political Science Association Annual Conference. (April) Chicago, IL. "Levels of Education and Support for Direct Democracy: A Survey Experiment."

Collingwood, Loren. 2008 American Political Science Association Annual Conference. (September) Boston, MA. "Levels of Education and Support for Direct Democracy: A Survey Experiment." (Poster)

Collingwood, Loren. 2008 American Political Science Association Annual Conference. (September) Boston, MA. "Response Effects in Multi-Candidate Primary Vote Questions." (Poster)

Computer Skills

R, Stata, Python, WinBugs/JAGS, L^AT_EX, SPSS, MySQL, Access, ArcGIS, Some C++ when interacting with R.

Reports

Collingwood, Loren. (2008). *The Washington Poll: pre-election analysis*. www.washingtonpoll.org.

Collingwood, Loren. (2008). *Democratic underperformance in the 2004 gubernatorial election: explaining 2004 voting patterns with an eye towards 2008*. www.washingtonpoll.org.

Barreto, Matt, Loren Collingwood, Francisco Pedraza, and Barry Pump. (2009). *Online voter registration in Washington State and Arizona*. Commissioned by Pew Research Center.

Collingwood, Loren, Todd Donovan, and Matt Barreto. (2009). *An assessment of ranked choice voting in Pierce County, WA*.

Collingwood, Loren. (2009). *An assessment of the fiscal impact of ranked choice voting in Pierce County, WA*. Commissioned by the League of Women Voters.

Barreto, Matt, and Loren Collingwood. (2009). *Latino candidates and racial block voting in primary and judicial elections: An analysis of voting in Los Angeles County board districts*. Commissioned by the Los Angeles County Chicano Employees Association.

Barreto, Matt, and Loren Collingwood. (2011). *A Review of Racially Polarized Voting For and Against Latino Candidates in Los Angeles County 1994-2010*. Commissioned by Los Angeles County Supervisor Gloria Molina. August 4.

Collingwood, Loren. (2012). *Recent Political History of Washington State: A Political Map*. Commissioned by the Korean Consulate.

Collingwood, Loren. (2012). *Analysis of Polling on Marijuana Initiatives*. Commissioned by Greenberg Quinlan Rosner.

Collingwood, Loren, Sean Long, and Francisco Pedraza. (2019). *Evaluating AltaMed Voter Mobilization in Southern California, November 2018*. Commissioned by AltaMed.

Relevant Work Experience

Collingwood Research, LLC

Statistical Consulting and Analysis

January 2008 - Present

Conducted over 200 projects involving political research, polling, statistical modeling, redistricting analysis and mapping, data analysis, micro-targeting, and R software development for political and non-profit clients. Clients include: Greenberg Quinlan Rosner, Latino Decisions, Pacific Market Research, Beck Research, Squier Knapp Dunn Communications, Anzalone-Lizst Research, League of Women Voters, Shelia Smoot for Congress, pollster.com, Comparative Agendas Project, Amplified Strategies, Gerstein Bocian & Agne, Strategies 360, the Korean Consulate, the California Redistricting Commission, Monterey County Redistricting Commission, ClearPath Strategies, Los Angeles County Council, Demchak & Baller Legal, Arnold & Porter LLP, JPM Strategic Solutions, National Democratic Institute (NDI) – on site in Iraq, Latham & Watkins, New York ACLU, United States Department of Justice (Demography), Inland Empire Funder's Alliance (Demography), Perkins & Coie, Elias Law Group; Campaign Legal Center; Santa Clara County (RPV Analysis); Native American Rights Fund (NARF); West Contra Costa Unified School District (Demography); Lawyers' Committee for Civil Rights Under Law; LatinoJustice PRLDEF, Voces de Frontera; Roswell, NM Independent School District

Expert Witness Work

Expert Witness: *LOWER BRULE SIOUX TRIBE v. LYMAN COUNTY*, 2022

Expert Witness: *Walen and Henderson v. Burgum and Jaeger No 1:22-cv-00031-PDW-CRH*, 2022

Expert Witness: *Faith Rivera, et al. v. Scott Schwab and Michael Abbott No. 2022-CV-000089*, 2022

Expert Witness: *LULAC Texas et al. v. John Scott et al (1:21-cv-0786-XR)*, 2022

Expert Witness: *Pendergrass v. Raffensperger (N.D. Ga. 2021)*,

Expert Witness: *Johnson, et al., v. WEC, et al., No. 2021AP1450-OA*, 2021

Expert Witness: *East St. Louis Branch NAACP vs. Illinois State Board of Elections*, 2021

Expert Witness: *LULAC of Iowa vs. Pate*, 2021-2022

Expert Witness: *United States Department of Justice vs. City of Hesperia*, 2021-2022

Expert Witness: *NAACP vs. East Ramapo Central School District*, New York, 2018-2019

Riverside County, Corona and Eastvale, 2015

Los Angeles County Redistricting Commission, 2011

Racially Polarized Voting analysis of Latino and Asian candidates in San Mateo County and alternative map creation, 2010-2011

State of California, Citizens Redistricting Commission, including Blythe, CA, in Riverside County, 2011

Monterey County, CA Redistricting, alternative map creation, 2011

Greenberg Quinlan Rosner

Assistant Analyst, Anna Greenberg

June 2005 - May 2007

Assisted in the development of questionnaires, focus group guidelines, memos, and survey reports for political, non-profit, and corporate clients. Moderated in-depth interviews and focus groups.

Greenberg Quinlan Rosner

Field Associate

December 2003 - June 2005

Managed qualitative and quantitative data collection process in the U.S. and internationally. Provided methodological advice, including sample stratification, sampling Latino populations, and modal sampling strategies.

Congressman Adam Schiff

Database Manager

March 2003 - June 2003

Managed constituent mail and survey databases; updated and maintained Member's Congressional voting record.

Strategic Consulting Group

Field Organizer, Carol Roberts for Congress

July 2002 - November 2002

Recruited and coordinated over 100 volunteers for mailings, canvassing, phone banking, and GOTV operations. Developed internship program and managed 15 interns from local colleges and high schools.

Institute for Policy Studies

Intern, John Cavanagh

May 2001 - August 2001

Provided research assistance for projects advocating reform of the WTO, World Bank, and IMF. Worked on reports and op-ed pieces on global economic issues advocating fair trade.

EXHIBIT 6

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

COAKLEY PENDERGRASS, *et al.*,

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

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

EXPERT REPORT OF JOHN B. MORGAN

Pursuant to 28 U.S.C. § 1746, Fed. R. Civ. P. 26, and F.R.E. 702 and 703, I, JOHN B. MORGAN, make the following declaration:

1. My name is John B. Morgan. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.

2. I hold a B.A. in History from the University of Chicago. As detailed in my CV, attached as Exhibit 1, I have extensive experience over many years in the field of redistricting. I have worked on redistricting plans in the redistricting efforts following the 1990 Census, the 2000 Census, the 2010 Census and the 2020 Census. I have testified as an expert witness in demographics and redistricting.

3. I am being compensated at a rate of \$325 per hour for my services in this case.

4. The redistricting geographic information system (GIS) software package used for this analysis is Maptitude for Redistricting 2021 from Caliper Corporation. The redistricting software was loaded with the Census PL94-171 data from the Census Bureau and the census geography for Georgia. I was also provided with election data files available to the Georgia General Assembly during the redistricting process. The full suite of census geography was available, including counties, places, voting districts, water bodies, and roads, as well as census blocks, which are the lowest level of geography for which the Census Bureau reports population counts. Census blocks are generally bounded by visible features, such as roads, streams, and railroads and they can range in size from a city block in urban and suburban areas to many square miles in rural areas.

5. I have been asked to review the congressional plan considered and adopted by the Georgia General Assembly and compare it to the proposed remedial congressional plans drawn by William Cooper.

Data used for analysis

6. A congressional plan was submitted for a preliminary injunction hearing, earlier in this case (I am designating this as Cooper PI plan). Mr. Cooper

submitted a congressional plan in his expert report in this case on December 5, 2022 (I am designating this as Cooper 1205 congressional plan).

7. In preparing this analysis, I was given the block-equivalency file of the Cooper 1205 congressional plan, the Cooper PI plan as well as the block-equivalency files of the 2021 adopted congressional plan.

8. I loaded the 2021 congressional plan adopted by the Georgia General Assembly into the Maptitude for Redistricting software using the block-equivalency files provided. I loaded the Cooper 1205 congressional plan and the Cooper PI plan into the Maptitude for Redistricting software using the block-equivalency files provided. I loaded the current existing (2012) congressional plan into the Maptitude for Redistricting software using files provided with the software.

9. Using the Maptitude for Redistricting software, I created district summary files for the 2021 adopted congressional plan and the Cooper 1205 congressional plan. These summary files listed information for each district such as: the deviation from ideal district size, total population, voting-age population, any-part Black voting age population, and non-Hispanic white voting age population as well as percentage values for the latter two categories.

10. Using the Maptitude for Redistricting software, I ran Maptitude reports for the 1205 Cooper congressional plan:

- 1- Measures of compactness report,
- 2- Population summary report,
- 3- Political subdivision splits report,
- 4- Plan component report,
- 5- Core constituency report compared to PI plan,
- 6- Core constituency report compared to Enacted 2021 plan,
- 7- Core constituency report comparing 2021 enacted plan to 2012 plan,
- 8- Plan component report for PI plan.

11. Each report is included in the exhibits to this report, numbered 2-9. I previously created these reports for the enacted plan that is included in my January 2022 report. I also created population summary reports for the Cooper PI plan.

Congressional district plan analysis

12. Using the district summary files, I tallied the number of majority-non-white districts using non-Hispanic white voting age population for each plan. The 2021 adopted congressional plan has five districts that are majority-non-white voting age population. The Cooper 1205 congressional plan has six districts that are majority non-white voting age population. I also looked at the any-part Black voting age population for districts in the 2021 adopted congressional plan and the Cooper remedial congressional plan. The Cooper 1205 congressional plan reduces the any-

part Black voting age population in District 13 to 51.13%. The Cooper 1205 congressional plan likewise makes District 6 a barely majority Black district at 50.23% any-part Black voting age population.

13. I ran core constituency reports in the Maptitude for Redistricting software to compare the 2021 adopted congressional plan to the existing 2012 congressional plan. I also compared the Cooper 1205 congressional plan to both the existing 2012 congressional plan and the 2021 adopted congressional plan. The core constituency reports compare one plan to another; showing how much population in a district from the first plan is the same in a district (or districts) in the second plan.

14. Georgia retained 14 congressional seats after the new congressional apportionment required by the 2020 Census. While the number of congressional districts remained the same, the existing (2012) congressional districts were not equal in population with the new population numbers from the 2020 census and would need to be re-drawn. The 2021 adopted congressional plan largely maintains existing district cores from the 2012 existing congressional plan. In sharp contrast, the Cooper 1205 congressional plan makes drastic changes to many districts when compared to the 2012 districts. The Cooper 1205 congressional plan moves District 6 from its 2012 and 2021 core in northern metro Atlanta to become a district consisting of western suburbs of Atlanta. The chart below uses data from the Core

Constituency reports for Cooper 1205 congressional plan and the districts in the 2021 adopted congressional plan (Ex. 7). The Core Constituency report shows how much population in a district from the 2012 congressional plan remains in the same district in the plan compared. The chart below expresses this as a percentage of the total population of the new district.

Chart 1. Core Constituency retention of (2012) districts

District	2021 Adopted Plan core retention	Cooper 1205 Congressional Plan core retention
Congress 001	96.59%	96.59%
Congress 002	84.65%	84.65%
Congress 003	88.52%	64.91%
Congress 004	70.58%	68.19%
Congress 005	86.70%	86.70%
Congress 006	52.86%	3.68%
Congress 007	56.97%	56.97%
Congress 008	81.43%	81.43%
Congress 009	67.36%	38.86%
Congress 010	70.19%	55.01%
Congress 011	88.73%	46.28%
Congress 012	85.56%	85.56%
Congress 013	86.04%	40.30%
Congress 014	89.82%	63.66%

15. As discussed in my report of January 2022, the Cooper PI plan is not a complete statewide plan and only contains eight congressional districts, although it

appears to be designed to fit into the 2021 adopted congressional plan. In contrast, the Cooper 1205 congressional plan is a complete statewide plan.

16. The Plan Component Report for the Cooper PI plan shows that District 3 has a portion of Douglas County with 25,423 population that is 24% 18+ AP-Black (Ex. 9). The Cooper 1205 congressional plan replaces this split of Douglas County with a nearly equal split of Cobb County of with 25,421 population. This allows the Political Subdivision split report for the Cooper 1205 congressional plan to show that Douglas County is not split (reducing the total number of county splits), but the report also shows that Cobb County is split between three districts (3, 6, and 11) instead of two districts as in the Cooper PI plan. District 3 in the Cooper 1205 congressional plan stretches from Columbus in Muscogee County to northern Cobb County.

17. Because the 18+ AP-Black % in the Cooper PI plan District 6 is so close to 50%, care must be taken to ensure that the portion removed and added to that district does not alter the overall 18+ AP-Black %. The racial concentrations of the portions included and excluded on the Cooper 1205 congressional plan District 6 show that care was taken to avoid changing the racial make-up of that district. (Ex. 5).

18. I also compared the Cooper 1205 congressional plan to the 2021 adopted congressional plan. In the Cooper 1205 congressional plan, six districts are the same as the enacted plan (1, 2, 5, 7, 8 and 12); however, the Cooper 1205 congressional plan has substantial discontinuity with the 2021 enacted congressional plan. The Core Constituency report (Ex. 7) shows that only 2.5% of the population from enacted plan District 6 overlaps with the Cooper 1205 congressional plan District 6. (Notably this is up from zero percent of the population overlaps in the Cooper PI plan.) An additional three of the districts in the Cooper 1205 congressional plan have less than 55% of the population from their corresponding districts in the 2021 adopted congressional plan (Districts 9, 11, 13). The remaining four districts are: CD 3 (69% overlapping), CD 4 (96% overlapping), CD 10 (64% overlapping) and CD 14 (62% overlapping).

19. I ran the split geography reports in the Maptitude for Redistricting software for the 2021 adopted congressional plan and the Cooper 1205 congressional plan. The split geography report shows how many political subdivisions – counties and voting precincts – are split.

20. The Cooper 1205 congressional plan splits the same number of counties as the 2021 adopted congressional plan at 15, in part due to the Douglas County

change discussed above. The Cooper 1205 congressional plan splits 43 voting precincts and the 2021 adopted congressional plan splits and 47 voting precincts.

21. I ran compactness reports in the Maptitude for Redistricting software for the 2021 adopted congressional plan and the Cooper 1205 CD plan. The Reock and Polsby-Popper compactness measures were shown in the reports for each district.

22. Cooper 1205 congressional plan has similar mean compactness scores to the 2021 enacted plan. Of the eight districts changed in the Cooper 1205 congressional plan, four districts are less compact on the Reock measurement, and five districts are less compact on the Polsby-Popper measurement. The chart below shows the compactness scores the congressional districts in the Cooper 1205 congressional plan and the 2021 adopted congressional plan.

Chart 2: Compactness score summary

District	Enacted Reock	Cooper 1205 Reock	Enacted Polsby-Popper	Cooper 1205 Polsby-Popper
001	0.46	0.46	0.29	0.29
002	0.46	0.46	0.27	0.27
003	0.46	0.39	0.28	0.24
004	0.31	0.28	0.25	0.22
005	0.51	0.51	0.32	0.32
006	0.42	0.45	0.2	0.27
007	0.5	0.5	0.39	0.39

District	Enacted Reock	Cooper 1205 Reock	Enacted Polsby- Popper	Cooper 1205 Polsby- Popper
008	0.34	0.34	0.21	0.21
009	0.38	0.4	0.25	0.32
010	0.56	0.4	0.28	0.18
011	0.48	0.4	0.21	0.19
012	0.5	0.5	0.28	0.28
013	0.38	0.44	0.16	0.29
014	0.43	0.48	0.37	0.34
Mean Compactness score	0.44	0.43	0.27	0.27

23. In summary, the Cooper 1205 congressional plan differs in meaningful ways from the 2021 plan adopted by the General Assembly. The Cooper 1205 congressional plan retains less of the core constituencies of the 2012 congressional plan than does the 2021 enacted congressional plan. The Cooper 1205 congressional plan also makes significant changes to the boundaries of districts from the 2021 enacted congressional plan. While six districts in the Cooper 1205 congressional plan match the 2021 enacted congressional plan, the Cooper 1205 congressional plan changes eight districts to create one new majority-Black congressional district.

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

Executed this 23rd day of January, 2023.



JOHN B. MORGAN

EXHIBIT 1

JOHN B. MORGAN

Curriculum Vitae

Redistricting Background and Experience

- Performed redistricting work in 20 states, in the areas of map drawing, problem-solving and redistricting software operation.
- Performed demographic and election analysis work in 40 states, for both statewide and legislative candidates

2021-2022 Redistricting Cycle

- Mapping expert for Michigan Independent Citizens Redistricting Commission
- Mapping expert for Virginia Redistricting Commission
- Mapping expert for New Jersey Congressional Redistricting Commission
- Mapping expert for New Jersey Legislative Redistricting Commission
- Staff analyst for New Mexico Senate Republican caucus – Dec. 2021 special session
- Mapping consultant to Indiana State Senate Republican caucus
- Mapping consultant to redistricting commissioners in Atlantic County, New Jersey
- Drafted county commission districts for Sampson County, North Carolina
- Drafted wards for town of Brownsburg, Indiana

2011-2012 Redistricting Cycle

- Served as a consultant for:
 - Connecticut Redistricting Commission
 - Ohio Reapportionment Board
 - New Jersey Legislative Redistricting Commission
 - New Jersey Congressional Redistricting Commission
 - Pennsylvania Legislative Reapportionment Commission
- Drafted Wake County, North Carolina school board districts
- Drafted county commission districts in Sampson and Craven counties in North Carolina and Atlantic County in New Jersey
- Worked with redistricting commissions in Atlantic and Essex counties, New Jersey.
- Worked on statewide congressional, legislative, and local plans in the following states: Connecticut, Indiana, Kansas, Missouri, New Jersey, New Mexico, North Carolina, Ohio, Pennsylvania, South Carolina, and Virginia
- Plans drafted by Morgan adopted in whole or part by the following states: Connecticut, Indiana, New Jersey, New Mexico, North Carolina, South Carolina, Virginia.

2001-2002 Redistricting Cycle

- Worked on statewide congressional and legislative redistricting plans in the following states: Florida, Georgia, Indiana, Iowa, New Jersey, North Carolina, Pennsylvania, Rhode Island, and Virginia.
- Dealt with redistricting issues as a member of the Majority Leader's legislative staff in Virginia House of Delegates. Drafted alternate plans for use by the minority parties in

Rhode Island. Drafted alternate plans for use by legislative leadership in considering plans drawn by redistricting commission staff in Iowa.

1991-1992 Redistricting Cycle

- Worked on statewide congressional and legislative redistricting plans in the following states: Florida, Illinois, Indiana, Michigan, New Jersey, New York, Pennsylvania, Wisconsin.
- Focused primarily on Voting Rights Act issues with Black, Hispanic and Asian communities.
- Federal court incorporated portion of legislative plan drafted in part by Morgan for Wisconsin into final decree, finding the configuration superior to other plans in its treatment of minority voters.

Expert Experience and Trial Testimony

- Recognized as an expert in demographics and redistricting in *Egolf v. Duran*, New Mexico First Judicial District Court, Case No. D-101-CV-2011-02942, which dealt with New Mexico's legislative plans.
- In *Egolf v. Duran*, the Court adopted a House redistricting plan principally drafted by Morgan.
- Filed expert reports in *Georgia State Conference of NAACP v. Fayette County Board of Commissioners*.
- Filed expert reports and expert testimony in *Page v. Board of Elections*, Eastern District of Virginia; provided expert testimony at trial.
- Testified at trial in *Bethune Hill v. Virginia Board of Elections* and *Vesilind v. Virginia Board of Elections*.
- Filed expert report in *Georgia NAACP v. Gwinnett County*.
- Filed expert reports and expert testimony *Alpha Phi Alpha v. Raffensperger*; *Grant v. Raffensperger*; and *Pendergrass v. Raffensperger*

Education

- Bachelor of Arts degree in History from the University of Chicago
- Graduated with honors.
- Bachelor's Honors thesis on "The Net Effects of Gerrymandering 1896-1932."
- Demographic study on LaSalle, Illinois was published in *The History of the Illinois and Michigan Canal, Volume Five*.

Employment

- President of Applied Research Coordinates, a consulting firm specializing in political and demographic analysis and its application to elections and redistricting, 2007 to present
- Redistricting consultant for many legislatures and commissions: 1991, 2001, 2011, 2021
- Executive Director, GOPAC (Hon. J.C. Watts, Chairman), 2004-2007
- Vice-President of Applied Research Coordinates, 1999-2004
- National Field Director, GOPAC (Rep. John Shadegg, Chairman) 1995-1999
- Research Analyst, Applied Research Coordinates 1991-1995
- Research Analyst, Republican National Committee 1988-1989, summer

EXHIBIT 2

User:

Plan Name: Pendergrass_cooper_CD_ILLUS_1205

Plan Type:

Measures of Compactness Report

Measures of Compactness Report

Pendergrass_cooper_CD_ILLUS_1205

	Reock	Polsby-Popper
Sum	N/A	N/A
Min	0.28	0.18
Max	0.51	0.39
Mean	0.43	0.27
Std. Dev.	0.07	0.06

District	Reock	Polsby-Popper
001	0.46	0.29
002	0.46	0.27
003	0.39	0.24
004	0.28	0.22
005	0.51	0.32
006	0.45	0.27
007	0.50	0.39
008	0.34	0.21
009	0.40	0.32
010	0.40	0.18
011	0.40	0.19
012	0.50	0.28
013	0.44	0.29
014	0.48	0.34

Measures of Compactness Summary

Reock The measure is always between 0 and 1, with 1 being the most compact.

Polsby-Popper The measure is always between 0 and 1, with 1 being the most compact.

EXHIBIT 3

User:

Plan Name: Pendergrass_cooper_CD_ILLUS_1205

Plan Type:

Population Summary

Population Summary

Pendergrass_cooper_CD_ILLUS_1205

District	Population	Deviation	% Devn.	[% 18+ _AP_Blkl	[% NH18+ _Wht]
001	765,137	1	0.00%	28.17%	60.41%
002	765,137	1	0.00%	49.29%	42.73%
003	765,135	-1	0.00%	20.47%	69.99%
004	765,136	0	0.00%	52.77%	30.11%
005	765,137	1	0.00%	49.6%	37.92%
006	765,137	1	0.00%	50.23%	32.76%
007	765,137	1	0.00%	29.82%	32.78%
008	765,136	0	0.00%	30.04%	60.52%
009	765,136	0	0.00%	11.66%	59.5%
010	765,137	1	0.00%	14.31%	74.25%
011	765,137	1	0.00%	13.67%	66.9%
012	765,136	0	0.00%	36.72%	54.65%
013	765,135	-1	0.00%	51.13%	35.94%
014	765,135	-1	0.00%	5.17%	80.77%

Total Population: 10,711,908

Ideal District Population: 765,136

Summary Statistics:

Population Range: 765,135 to 765,137

Ratio Range: 0.00

Absolute Range: -1 to 1

Absolute Overall Range: 2

Relative Range: 0.00% to 0.00%

Relative Overall Range: 0.00%

Absolute Mean Deviation: 0.71

Relative Mean Deviation: 0.00%

Standard Deviation: 0.8

EXHIBIT 4

User:

Plan Name: Pendergrass_cooper_CD_ILLUS_1205

Plan Type:

Political Subdivision Splits Between Districts

Political Subdivision Splits Between Districts

Pendergrass_cooper_CD_ILLUS_1205

Number of subdivisions not split:

County	144
Voting District	2,655

Number of subdivisions split into more than one district:

County	15
Voting District	43

Number of splits involving no population:

County	0
Voting District	1

Split Counts

County

Cases where an area is split among 2 Districts: 13

Cases where an area is split among 3 Districts: 1

Cases where an area is split among 4 Districts: 1

Voting District

Cases where an area is split among 2 Districts: 42

Cases where an area is split among 3 Districts: 1

County	Voting District	District	Population
<i>Split Counties:</i>			
Bibb GA		002	108,371
Bibb GA		008	48,975
Cherokee GA		011	122,400
Cherokee GA		014	144,220
Clayton GA		005	37,919
Clayton GA		013	259,676
Cobb GA		003	25,421
Cobb GA		006	452,386
Cobb GA		011	288,342
DeKalb GA		004	601,451
DeKalb GA		005	162,931
Effingham GA		001	47,208
Effingham GA		012	17,561
Fayette GA		006	4,143
Fayette GA		013	115,051
Fulton GA		005	564,287
Fulton GA		006	164,371
Fulton GA		007	92,558
Fulton GA		011	245,494
Gwinnett GA		007	672,579
Gwinnett GA		009	284,483
Hall GA		009	153,463

Political Subdivision Splits Between Districts

Pendergrass_cooper_CD_ILLUS_1205

Hall GA		010	49,673
Houston GA		002	48,521
Houston GA		008	115,112
Lumpkin GA		010	29,598
Lumpkin GA		014	3,890
Muscogee GA		002	175,155
Muscogee GA		003	31,767
Newton GA		004	70,115
Newton GA		013	42,368
Wilkes GA		010	1,802
Wilkes GA		012	7,763

Split VTDs:

Bibb GA	HOWARD 2	002	0
Bibb GA	HOWARD 2	008	5,445
Bibb GA	VINEVILLE 6	002	2,527
Bibb GA	VINEVILLE 6	008	1,846
Cherokee GA	ARNOLD MILL	011	5,916
Cherokee GA	ARNOLD MILL	014	623
Cherokee GA	TOONIGH	011	373
Cherokee GA	TOONIGH	014	8,830
Cobb GA	Durham 01	003	987
Cobb GA	Durham 01	011	4,330
Cobb GA	Eastside 02	006	4,603
Cobb GA	Eastside 02	011	598
Cobb GA	Elizabeth 02	006	334
Cobb GA	Elizabeth 02	011	2,968
Cobb GA	Harrison 01	003	3,865
Cobb GA	Harrison 01	011	85
Cobb GA	Kemp 03	003	4,841
Cobb GA	Kemp 03	006	30
Cobb GA	Kennesaw 1A	006	2,972
Cobb GA	Kennesaw 1A	011	1,471
Cobb GA	Kennesaw 3A	006	3,540
Cobb GA	Kennesaw 3A	011	5,962
Cobb GA	Lost Mountain 03	003	31
Cobb GA	Lost Mountain 03	006	6,841
Cobb GA	Pine Mountain 02	003	23
Cobb GA	Pine Mountain 02	006	967
Cobb GA	Pine Mountain 02	011	2,986
Cobb GA	Sewell Mill 03	006	4,245
Cobb GA	Sewell Mill 03	011	2,692
DeKalb GA	Avondale (AVO)	004	341
DeKalb GA	Avondale (AVO)	005	3,226
DeKalb GA	North Decatur	004	2,220
DeKalb GA	North Decatur	005	1,670
DeKalb GA	Scott	004	2,482
DeKalb GA	Scott	005	1,434
Effingham GA	4B	001	2,759
Effingham GA	4B	012	160
Fayette GA	RAREOVER	006	2,062
Fayette GA	RAREOVER	013	1,650

Political Subdivision Splits Between Districts

Pendergrass_cooper_CD_ILLUS_1205

Fayette GA	SANDY CREEK	006	2,081
Fayette GA	SANDY CREEK	013	4,627
Fulton GA	11C	005	3,058
Fulton GA	11C	006	700
Fulton GA	CP051	005	79
Fulton GA	CP051	006	1,718
Fulton GA	RW21	007	4,138
Fulton GA	RW21	011	164
Fulton GA	RW22A	007	11
Fulton GA	RW22A	011	7,186
Fulton GA	SC02	005	220
Fulton GA	SC02	006	773
Fulton GA	SS01	007	1,550
Fulton GA	SS01	011	3,803
Fulton GA	SS03	005	1,254
Fulton GA	SS03	011	900
Fulton GA	SS04	005	219
Fulton GA	SS04	011	5,019
Fulton GA	SS08C	005	438
Fulton GA	SS08C	011	594
Fulton GA	SS18A	005	472
Fulton GA	SS18A	011	309
Gwinnett GA	SUWANEE G	007	815
Gwinnett GA	SUWANEE G	009	5,138
Hall GA	GAINESVILLE I	009	6,606
Hall GA	GAINESVILLE I	010	181
Hall GA	GLADE	009	25
Hall GA	GLADE	010	6,845
Hall GA	WHELCHER	009	366
Hall GA	WHELCHER	010	5,685
Lumpkin GA	DAHLONEGA	010	29,598
Lumpkin GA	DAHLONEGA	014	3,890
Muscogee GA	COLUMBUS TECH	002	7,876
Muscogee GA	COLUMBUS TECH	003	1,271
Muscogee GA	CORNERSTONE	002	10,259
Muscogee GA	CORNERSTONE	003	192
Muscogee GA	ST PAUL/CLUBVIEW	002	6,958
Muscogee GA	ST PAUL/CLUBVIEW	003	1,082
Newton GA	BEAVERDAM	004	101
Newton GA	BEAVERDAM	013	7,174
Newton GA	CROWELL	004	3,263
Newton GA	CROWELL	013	3,967
Newton GA	FAIRVIEW	004	856
Newton GA	FAIRVIEW	013	3,443
Wilkes GA	3174A - COURTHOUSE	010	106
Wilkes GA	3174A - COURTHOUSE	012	1,114
Wilkes GA	3174B - TIGNALL SCHOOL	010	774
Wilkes GA	3174B - TIGNALL SCHOOL	012	407

EXHIBIT 5

User:

Plan Name: Pendergrass_cooper_CD_ILLUS_1205

Plan Type:

Plan Components with Population Detail

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

	Total Population	AP_Bl
District 001		
County: Appling GA		
Total:	18,444	3,647 19.77%
Voting Age	13,958	2,540 18.20%
County: Bacon GA		
Total:	11,140	1,970 17.68%
Voting Age	8,310	1,245 14.98%
County: Brantley GA		
Total:	18,021	733 4.07%
Voting Age	13,692	470 3.43%
County: Bryan GA		
Total:	44,738	7,463 16.68%
Voting Age	31,828	5,025 15.79%
County: Camden GA		
Total:	54,768	11,072 20.22%
Voting Age	41,808	7,828 18.72%
County: Charlton GA		
Total:	12,518	2,798 22.35%
Voting Age	10,135	2,147 21.18%
County: Chatham GA		
Total:	295,291	115,458 39.10%
Voting Age	234,715	85,178 36.29%
County: Effingham GA		
Total:	47,208	6,652 14.09%
Voting Age	34,272	4,374 12.76%
County: Glynn GA		
Total:	84,499	22,098 26.15%

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

Voting Age	66,468	15,620 23.50%
County: Liberty GA		
Total:	65,256	31,146 47.73%
Voting Age	48,014	21,700 45.20%
County: Long GA		
Total:	16,168	4,734 29.28%
Voting Age	11,234	3,107 27.66%
County: McIntosh GA		
Total:	10,975	3,400 30.98%
Voting Age	9,040	2,641 29.21%
County: Pierce GA		
Total:	19,716	1,801 9.13%
Voting Age	14,899	1,262 8.47%
County: Ware GA		
Total:	36,251	11,421 31.51%
Voting Age	27,788	8,226 29.60%
County: Wayne GA		
Total:	30,144	6,390 21.20%
Voting Age	23,105	4,662 20.18%
District 001 Total		
Total:	765,137	230,783 30.16%
Voting Age	589,266	166,025 28.17%
District 002		
County: Baker GA		
Total:	2,876	1,178 40.96%
Voting Age	2,275	932 40.97%
County: Bibb GA		
Total:	108,371	72,197 66.62%
Voting Age	82,489	52,370 63.49%
County: Calhoun GA		
Total:	5,573	3,629 65.12%
Voting Age	4,687	2,998 63.96%
County: Chattahoochee GA		

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

Total:	9,565	1,825
		19.08%
Voting Age	7,199	1,287
		17.88%
County: Clay GA		
Total:	2,848	1,634
		57.37%
Voting Age	2,246	1,231
		54.81%
County: Crawford GA		
Total:	12,130	2,455
		20.24%
Voting Age	9,606	1,938
		20.17%
County: Decatur GA		
Total:	29,367	12,583
		42.85%
Voting Age	22,443	9,189
		40.94%
County: Dooly GA		
Total:	11,208	5,652
		50.43%
Voting Age	9,187	4,526
		49.27%
County: Dougherty GA		
Total:	85,790	61,457
		71.64%
Voting Age	66,266	45,631
		68.86%
County: Early GA		
Total:	10,854	5,688
		52.40%
Voting Age	8,315	4,075
		49.01%
County: Grady GA		
Total:	26,236	7,693
		29.32%
Voting Age	19,962	5,678
		28.44%
County: Houston GA		
Total:	48,521	22,637
		46.65%
Voting Age	36,233	15,657
		43.21%
County: Lee GA		
Total:	33,163	7,755
		23.38%
Voting Age	24,676	5,503
		22.30%
County: Macon GA		
Total:	12,082	7,296
		60.39%
Voting Age	9,938	6,021
		60.59%

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

County: Marion GA		
Total:	7,498	2,223
		29.65%
Voting Age	5,854	1,687
		28.82%
County: Miller GA		
Total:	6,000	1,831
		30.52%
Voting Age	4,749	1,358
		28.60%
County: Mitchell GA		
Total:	21,755	10,394
		47.78%
Voting Age	17,065	7,917
		46.39%
County: Muscogee GA		
Total:	175,155	95,521
		54.54%
Voting Age	132,158	69,548
		52.62%
County: Peach GA		
Total:	27,981	12,645
		45.19%
Voting Age	22,111	9,720
		43.96%
County: Quitman GA		
Total:	2,235	965
		43.18%
Voting Age	1,870	765
		40.91%
County: Randolph GA		
Total:	6,425	3,947
		61.43%
Voting Age	4,977	2,913
		58.53%
County: Schley GA		
Total:	4,547	933
		20.52%
Voting Age	3,328	644
		19.35%
County: Seminole GA		
Total:	9,147	3,093
		33.81%
Voting Age	7,277	2,275
		31.26%
County: Stewart GA		
Total:	5,314	2,538
		47.76%
Voting Age	4,617	2,048
		44.36%
County: Sumter GA		
Total:	29,616	15,546
		52.49%
Voting Age	23,036	11,479

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

		49.83%
County: Talbot GA		
Total:	5,733	3,145
		54.86%
Voting Age	4,783	2,537
		53.04%
County: Taylor GA		
Total:	7,816	2,946
		37.69%
Voting Age	6,120	2,235
		36.52%
County: Terrell GA		
Total:	9,185	5,707
		62.13%
Voting Age	7,204	4,274
		59.33%
County: Thomas GA		
Total:	45,798	16,975
		37.06%
Voting Age	35,037	12,332
		35.20%
County: Webster GA		
Total:	2,348	1,107
		47.15%
Voting Age	1,847	844
		45.70%
District 002 Total		
Total:	765,137	393,195
		51.39%
Voting Age	587,555	289,612
		49.29%
District 003		
County: Carroll GA		
Total:	119,148	24,618
		20.66%
Voting Age	90,996	17,827
		19.59%
County: Cobb GA		
Total:	25,421	2,784
		10.95%
Voting Age	18,690	1,889
		10.11%
County: Coweta GA		
Total:	146,158	28,289
		19.36%
Voting Age	111,155	20,196
		18.17%
County: Haralson GA		
Total:	29,919	1,541
		5.15%
Voting Age	22,854	1,106
		4.84%
County: Harris GA		
Total:	34,668	5,742

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

		16.56%
Voting Age	26,799	4,431
		16.53%
County: Heard GA		
Total:	11,412	1,142
		10.01%
Voting Age	8,698	832
		9.57%
County: Lamar GA		
Total:	18,500	5,220
		28.22%
Voting Age	14,541	4,017
		27.63%
County: Meriwether GA		
Total:	20,613	7,547
		36.61%
Voting Age	16,526	5,845
		35.37%
County: Muscogee GA		
Total:	31,767	6,691
		21.06%
Voting Age	24,894	4,753
		19.09%
County: Paulding GA		
Total:	168,661	41,296
		24.48%
Voting Age	123,998	28,164
		22.71%
County: Pike GA		
Total:	18,889	1,613
		8.54%
Voting Age	14,337	1,254
		8.75%
County: Polk GA		
Total:	42,853	5,816
		13.57%
Voting Age	32,238	3,991
		12.38%
County: Troup GA		
Total:	69,426	25,473
		36.69%
Voting Age	52,581	18,202
		34.62%
County: Upson GA		
Total:	27,700	8,324
		30.05%
Voting Age	21,711	6,202
		28.57%
District 003 Total		
Total:	765,135	166,096
		21.71%
Voting Age	580,018	118,709
		20.47%
District 004		

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

County: DeKalb GA		
Total:	601,451	322,421 53.61%
Voting Age	465,661	247,548 53.16%
County: Newton GA		
Total:	70,115	30,394 43.35%
Voting Age	53,476	22,187 41.49%
County: Rockdale GA		
Total:	93,570	57,204 61.13%
Voting Age	71,503	41,935 58.65%
District 004 Total		
Total:	765,136	410,019 53.59%
Voting Age	590,640	311,670 52.77%
District 005		
County: Clayton GA		
Total:	37,919	27,594 72.77%
Voting Age	27,885	20,301 72.80%
County: DeKalb GA		
Total:	162,931	85,030 52.19%
Voting Age	129,615	66,682 51.45%
County: Fulton GA		
Total:	564,287	280,198 49.66%
Voting Age	464,015	221,288 47.69%
District 005 Total		
Total:	765,137	392,822 51.34%
Voting Age	621,515	308,271 49.60%
District 006		
County: Cobb GA		
Total:	452,386	175,347 38.76%
Voting Age	352,053	131,674 37.40%
County: Douglas GA		
Total:	144,237	74,260 51.48%
Voting Age	108,428	53,377 49.23%
County: Fayette GA		
Total:	4,143	998

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

		24.09%
Voting Age	3,000	652
		21.73%
County: Fulton GA		
Total:	164,371	146,286
		89.00%
Voting Age	123,766	109,273
		88.29%
District 006 Total		
Total:	765,137	396,891
		51.87%
Voting Age	587,247	294,976
		50.23%
District 007		
County: Fulton GA		
Total:	92,558	11,462
		12.38%
Voting Age	69,229	8,135
		11.75%
County: Gwinnett GA		
Total:	672,579	228,255
		33.94%
Voting Age	497,705	160,936
		32.34%
District 007 Total		
Total:	765,137	239,717
		31.33%
Voting Age	566,934	169,071
		29.82%
District 008		
County: Atkinson GA		
Total:	8,286	1,284
		15.50%
Voting Age	6,129	937
		15.29%
County: Baldwin GA		
Total:	43,799	18,985
		43.35%
Voting Age	35,732	14,515
		40.62%
County: Ben Hill GA		
Total:	17,194	6,537
		38.02%
Voting Age	13,165	4,745
		36.04%
County: Berrien GA		
Total:	18,160	2,198
		12.10%
Voting Age	13,690	1,499
		10.95%
County: Bibb GA		
Total:	48,975	16,668
		34.03%
Voting Age	38,413	11,900

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

		30.98%
County: Bleckley GA		
Total:	12,583	2,951
		23.45%
Voting Age	9,613	2,036
		21.18%
County: Brooks GA		
Total:	16,301	5,958
		36.55%
Voting Age	12,747	4,357
		34.18%
County: Clinch GA		
Total:	6,749	2,096
		31.06%
Voting Age	5,034	1,406
		27.93%
County: Coffee GA		
Total:	43,092	12,575
		29.18%
Voting Age	32,419	9,191
		28.35%
County: Colquitt GA		
Total:	45,898	10,648
		23.20%
Voting Age	34,193	7,461
		21.82%
County: Cook GA		
Total:	17,229	5,014
		29.10%
Voting Age	12,938	3,595
		27.79%
County: Crisp GA		
Total:	20,128	9,194
		45.68%
Voting Age	15,570	6,603
		42.41%
County: Dodge GA		
Total:	19,925	6,148
		30.86%
Voting Age	15,709	4,725
		30.08%
County: Echols GA		
Total:	3,697	193
		5.22%
Voting Age	2,709	121
		4.47%
County: Houston GA		
Total:	115,112	33,883
		29.43%
Voting Age	85,885	23,948
		27.88%
County: Irwin GA		
Total:	9,666	2,333
		24.14%

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

Voting Age	7,547	1,720 22.79%
County: Jeff Davis GA		
Total:	14,779	2,493 16.87%
Voting Age	10,856	1,752 16.14%
County: Jones GA		
Total:	28,347	7,114 25.10%
Voting Age	21,575	5,341 24.76%
County: Lanier GA		
Total:	9,877	2,369 23.99%
Voting Age	7,326	1,683 22.97%
County: Lowndes GA		
Total:	118,251	46,758 39.54%
Voting Age	89,031	33,302 37.40%
County: Monroe GA		
Total:	27,957	6,444 23.05%
Voting Age	21,913	5,068 23.13%
County: Pulaski GA		
Total:	9,855	3,250 32.98%
Voting Age	8,012	2,564 32.00%
County: Telfair GA		
Total:	12,477	4,754 38.10%
Voting Age	10,190	3,806 37.35%
County: Tift GA		
Total:	41,344	12,734 30.80%
Voting Age	31,224	8,963 28.71%
County: Turner GA		
Total:	9,006	3,813 42.34%
Voting Age	6,960	2,752 39.54%
County: Twiggs GA		
Total:	8,022	3,226 40.21%
Voting Age	6,589	2,627 39.87%
County: Wilcox GA		
Total:	8,766	3,161

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

		36.06%
Voting Age	7,218	2,693
		37.31%
County: Wilkinson GA		
Total:	8,877	3,330
		37.51%
Voting Age	7,026	2,549
		36.28%
County: Worth GA		
Total:	20,784	5,517
		26.54%
Voting Age	16,444	4,108
		24.98%
District 008 Total		
Total:	765,136	241,628
		31.58%
Voting Age	585,857	175,967
		30.04%
District 009		
County: Forsyth GA		
Total:	251,283	13,222
		5.26%
Voting Age	181,193	8,751
		4.83%
County: Gwinnett GA		
Total:	284,483	59,432
		20.89%
Voting Age	211,779	41,826
		19.75%
County: Hall GA		
Total:	153,463	15,257
		9.94%
Voting Age	114,821	10,945
		9.53%
County: Jackson GA		
Total:	75,907	6,148
		8.10%
Voting Age	56,451	4,268
		7.56%
District 009 Total		
Total:	765,136	94,059
		12.29%
Voting Age	564,244	65,790
		11.66%
District 010		
County: Banks GA		
Total:	18,035	589
		3.27%
Voting Age	13,900	365
		2.63%
County: Barrow GA		
Total:	83,505	11,907
		14.26%
Voting Age	62,195	8,222

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

		13.22%
County: Clarke GA		
Total:	128,671	33,672
		26.17%
Voting Age	106,830	24,776
		23.19%
County: Elbert GA		
Total:	19,637	5,520
		28.11%
Voting Age	15,493	4,122
		26.61%
County: Franklin GA		
Total:	23,424	2,207
		9.42%
Voting Age	18,307	1,523
		8.32%
County: Greene GA		
Total:	18,915	6,027
		31.86%
Voting Age	15,358	4,470
		29.11%
County: Habersham GA		
Total:	46,031	2,165
		4.70%
Voting Age	35,878	1,675
		4.67%
County: Hall GA		
Total:	49,673	1,749
		3.52%
Voting Age	39,023	1,149
		2.94%
County: Hancock GA		
Total:	8,735	6,131
		70.19%
Voting Age	7,487	5,108
		68.22%
County: Hart GA		
Total:	25,828	4,732
		18.32%
Voting Age	20,436	3,447
		16.87%
County: Lumpkin GA		
Total:	29,598	643
		2.17%
Voting Age	24,614	482
		1.96%
County: Madison GA		
Total:	30,120	3,196
		10.61%
Voting Age	23,112	2,225
		9.63%
County: Morgan GA		
Total:	20,097	4,339
		21.59%

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

Voting Age	15,574	3,280 21.06%
County: Oconee GA		
Total:	41,799	2,280 5.45%
Voting Age	30,221	1,660 5.49%
County: Oglethorpe GA		
Total:	14,825	2,468 16.65%
Voting Age	11,639	1,853 15.92%
County: Putnam GA		
Total:	22,047	5,701 25.86%
Voting Age	17,847	4,229 23.70%
County: Rabun GA		
Total:	16,883	210 1.24%
Voting Age	13,767	129 0.94%
County: Stephens GA		
Total:	26,784	3,527 13.17%
Voting Age	21,163	2,467 11.66%
County: Taliaferro GA		
Total:	1,559	876 56.19%
Voting Age	1,289	722 56.01%
County: Towns GA		
Total:	12,493	168 1.34%
Voting Age	10,923	137 1.25%
County: Walton GA		
Total:	96,673	18,804 19.45%
Voting Age	73,098	13,165 18.01%
County: White GA		
Total:	28,003	721 2.57%
Voting Age	22,482	484 2.15%
County: Wilkes GA		
Total:	1,802	567 31.47%
Voting Age	1,491	488 32.73%
District 010 Total		
Total:	765,137	118,199

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

		15.45%
Voting Age	602,127	86,178
		14.31%
District 011		
County: Bartow GA		
Total:	108,901	13,395
		12.30%
Voting Age	83,570	9,377
		11.22%
County: Cherokee GA		
Total:	122,400	12,310
		10.06%
Voting Age	93,948	8,613
		9.17%
County: Cobb GA		
Total:	288,342	44,985
		15.60%
Voting Age	221,105	32,578
		14.73%
County: Fulton GA		
Total:	245,494	39,678
		16.16%
Voting Age	190,172	29,939
		15.74%
District 011 Total		
Total:	765,137	110,368
		14.42%
Voting Age	588,795	80,507
		13.67%
District 012		
County: Bulloch GA		
Total:	81,099	24,375
		30.06%
Voting Age	64,494	18,220
		28.25%
County: Burke GA		
Total:	24,596	11,430
		46.47%
Voting Age	18,778	8,362
		44.53%
County: Candler GA		
Total:	10,981	2,807
		25.56%
Voting Age	8,241	2,009
		24.38%
County: Columbia GA		
Total:	156,010	32,516
		20.84%
Voting Age	114,823	22,273
		19.40%
County: Effingham GA		
Total:	17,561	3,383
		19.26%
Voting Age	13,023	2,457

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

		18.87%
County: Emanuel GA		
Total:	22,768	7,556
		33.19%
Voting Age	17,320	5,404
		31.20%
County: Evans GA		
Total:	10,774	3,273
		30.38%
Voting Age	8,127	2,410
		29.65%
County: Glascock GA		
Total:	2,884	226
		7.84%
Voting Age	2,236	167
		7.47%
County: Jefferson GA		
Total:	15,709	8,208
		52.25%
Voting Age	12,301	6,324
		51.41%
County: Jenkins GA		
Total:	8,674	3,638
		41.94%
Voting Age	7,005	2,843
		40.59%
County: Johnson GA		
Total:	9,189	3,124
		34.00%
Voting Age	7,474	2,513
		33.62%
County: Laurens GA		
Total:	49,570	19,132
		38.60%
Voting Age	37,734	13,695
		36.29%
County: Lincoln GA		
Total:	7,690	2,212
		28.76%
Voting Age	6,270	1,728
		27.56%
County: McDuffie GA		
Total:	21,632	9,045
		41.81%
Voting Age	16,615	6,425
		38.67%
County: Montgomery GA		
Total:	8,610	2,224
		25.83%
Voting Age	6,792	1,781
		26.22%
County: Richmond GA		
Total:	206,607	119,970
		58.07%

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

Voting Age	160,899	87,930 54.65%
County: Screven GA		
Total:	14,067	5,527 39.29%
Voting Age	10,893	4,144 38.04%
County: Tattnall GA		
Total:	22,842	6,331 27.72%
Voting Age	17,654	4,886 27.68%
County: Toombs GA		
Total:	27,030	7,402 27.38%
Voting Age	20,261	5,036 24.86%
County: Treutlen GA		
Total:	6,406	2,114 33.00%
Voting Age	4,934	1,514 30.69%
County: Warren GA		
Total:	5,215	3,128 59.98%
Voting Age	4,159	2,360 56.74%
County: Washington GA		
Total:	19,988	10,969 54.88%
Voting Age	15,709	8,333 53.05%
County: Wheeler GA		
Total:	7,471	2,949 39.47%
Voting Age	6,217	2,561 41.19%
County: Wilkes GA		
Total:	7,763	3,422 44.08%
Voting Age	6,160	2,583 41.93%
District 012 Total		
Total:	765,136	294,961 38.55%
Voting Age	588,119	215,958 36.72%
District 013		
County: Butts GA		
Total:	25,434	7,212 28.36%
Voting Age	20,360	5,660 27.80%
County: Clayton GA		

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

Total:	259,676	188,757
		72.69%
Voting Age	192,693	138,553
		71.90%
County: Fayette GA		
Total:	115,051	31,078
		27.01%
Voting Age	88,798	23,076
		25.99%
County: Henry GA		
Total:	240,712	125,211
		52.02%
Voting Age	179,973	89,657
		49.82%
County: Jasper GA		
Total:	14,588	2,676
		18.34%
Voting Age	11,118	1,966
		17.68%
County: Newton GA		
Total:	42,368	25,507
		60.20%
Voting Age	31,272	18,246
		58.35%
County: Spalding GA		
Total:	67,306	24,522
		36.43%
Voting Age	52,123	17,511
		33.60%
District 013 Total		
Total:	765,135	404,963
		52.93%
Voting Age	576,337	294,669
		51.13%
District 014		
County: Catoosa GA		
Total:	67,872	2,642
		3.89%
Voting Age	52,448	1,684
		3.21%
County: Chattooga GA		
Total:	24,965	2,865
		11.48%
Voting Age	19,416	2,235
		11.51%
County: Cherokee GA		
Total:	144,220	9,377
		6.50%
Voting Age	108,980	6,363
		5.84%
County: Dade GA		
Total:	16,251	228
		1.40%
Voting Age	12,987	140

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

		1.08%
County: Dawson GA		
Total:	26,798	392
		1.46%
Voting Age	21,441	249
		1.16%
County: Fannin GA		
Total:	25,319	199
		0.79%
Voting Age	21,188	133
		0.63%
County: Floyd GA		
Total:	98,584	15,606
		15.83%
Voting Age	76,295	11,064
		14.50%
County: Gilmer GA		
Total:	31,353	296
		0.94%
Voting Age	25,417	161
		0.63%
County: Gordon GA		
Total:	57,544	2,919
		5.07%
Voting Age	43,500	1,939
		4.46%
County: Lumpkin GA		
Total:	3,890	42
		1.08%
Voting Age	3,075	25
		0.81%
County: Murray GA		
Total:	39,973	556
		1.39%
Voting Age	30,210	321
		1.06%
County: Pickens GA		
Total:	33,216	512
		1.54%
Voting Age	26,799	319
		1.19%
County: Union GA		
Total:	24,632	228
		0.93%
Voting Age	20,808	147
		0.71%
County: Walker GA		
Total:	67,654	3,664
		5.42%
Voting Age	52,794	2,454
		4.65%
County: Whitfield GA		
Total:	102,864	4,919
		4.78%

Plan Components with Population Detail

Pendergrass_cooper_CD_ILLUS_1205

Voting Age	76,262	3,349 4.39%
District 014 Total		
Total:	765,135	44,445 5.81%
Voting Age	591,620	30,583 5.17%

EXHIBIT 6

User:

Plan Name: Pendergrass_cooper_CD_ILLUS_1205

Plan Type:

Core Constituencies

Core Constituencies

Pendergrass_cooper_CD_ILLUS_1205

From Plan: **GA_Pendergrass_Cooper_Remedial**

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 001 -- **765,137 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. Unassigned	765,137 (100.00%)	230,783 (100.00%)	589,266 (100.00%)	166,025 (100.00%)
Total and % Population		230,783 (30.16%)	589,266 (77.01%)	166,025 (21.70%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 002 -- **765,137 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. Unassigned	765,137 (100.00%)	393,195 (100.00%)	587,555 (100.00%)	289,612 (100.00%)
Total and % Population		393,195 (51.39%)	587,555 (76.79%)	289,612 (37.85%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 003 -- **765,135 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 003	739,714 (96.68%)	163,312 (98.32%)	561,328 (96.78%)	116,820 (98.41%)
Dist. 006	31 (0.00%)	2 (0.00%)	23 (0.00%)	2 (0.00%)
Dist. 011	25,390 (3.32%)	2,782 (1.67%)	18,667 (3.22%)	1,887 (1.59%)
Total and % Population		166,096 (21.71%)	580,018 (75.81%)	118,709 (15.51%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 004 -- **765,136 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 004	757,754 (99.04%)	404,114 (98.56%)	585,224 (99.08%)	307,422 (98.64%)
Dist. 013	7,382 (0.96%)	5,905 (1.44%)	5,416 (0.92%)	4,248 (1.36%)
Total and % Population		410,019 (53.59%)	590,640 (77.19%)	311,670 (40.73%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 005 -- **765,137 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. Unassigned	765,137 (100.00%)	392,822 (100.00%)	621,515 (100.00%)	308,271 (100.00%)
Total and % Population		392,822 (51.34%)	621,515 (81.23%)	308,271 (40.29%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 006 -- **765,137 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
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Core Constituencies

Pendergrass_cooper_CD_ILLUS_1205

Dist. 003	25,423 (3.32%)	6,628 (1.67%)	19,300 (3.29%)	4,623 (1.57%)
Dist. 006	713,183 (93.21%)	383,622 (96.66%)	547,142 (93.17%)	285,385 (96.75%)
Dist. 011	22,388 (2.93%)	5,643 (1.42%)	17,805 (3.03%)	4,316 (1.46%)
Dist. 013	4,143 (0.54%)	998 (0.25%)	3,000 (0.51%)	652 (0.22%)
Total and % Population		396,891 (51.87%)	587,247 (76.75%)	294,976 (38.55%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 007 -- **765,137 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. Unassigned	765,137 (100.00%)	239,717 (100.00%)	566,934 (100.00%)	169,071 (100.00%)
Total and % Population		239,717 (31.33%)	566,934 (74.10%)	169,071 (22.10%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 008 -- **765,136 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. Unassigned	765,136 (100.00%)	241,628 (100.00%)	585,857 (100.00%)	175,967 (100.00%)
Total and % Population		241,628 (31.58%)	585,857 (76.57%)	175,967 (23.00%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 009 -- **765,136 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 009	765,136 (100.00%)	94,059 (100.00%)	564,244 (100.00%)	65,790 (100.00%)
Total and % Population		94,059 (12.29%)	564,244 (73.74%)	65,790 (8.60%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 010 -- **765,137 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 010	765,137 (100.00%)	118,199 (100.00%)	602,127 (100.00%)	86,178 (100.00%)
Total and % Population		118,199 (15.45%)	602,127 (78.70%)	86,178 (11.26%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 011 -- **765,137 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 006	47,780 (6.24%)	11,429 (10.36%)	38,053 (6.46%)	8,785 (10.91%)
Dist. 011	717,357 (93.76%)	98,939 (89.64%)	550,742 (93.54%)	71,722 (89.09%)
Total and % Population		110,368 (14.42%)	588,795 (76.95%)	80,507 (10.52%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 012 -- **765,136 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. Unassigned	765,136 (100.00%)	294,961 (100.00%)	588,119 (100.00%)	215,958 (100.00%)
Total and % Population		294,961 (38.55%)	588,119 (76.86%)	215,958 (28.22%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 013 -- **765,135 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
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Core Constituencies

Pendergrass_cooper_CD_ILLUS_1205

Dist. 004	7,381 (0.96%)	2,930 (0.72%)	5,364 (0.93%)	2,027 (0.69%)
Dist. 006	4,143 (0.54%)	1,883 (0.46%)	3,300 (0.57%)	1,460 (0.50%)
Dist. 013	753,611 (98.49%)	400,150 (98.81%)	567,673 (98.50%)	291,182 (98.82%)
Total and % Population		404,963 (52.93%)	576,337 (75.32%)	294,669 (38.51%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 014 --

765,135 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 014	765,135 (100.00%)	44,445 (100.00%)	591,620 (100.00%)	30,583 (100.00%)
Total and % Population		44,445 (5.81%)	591,620 (77.32%)	30,583 (4.00%)

EXHIBIT 7

User:

Plan Name: Pendergrass_cooper_CD_ILLUS_1205

Plan Type:

Core Constituencies

Core Constituencies

Pendergrass_cooper_CD_ILLUS_1205

From Plan: GA_Congress2021

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 001 --

765,137 Total Population

	Population	AP_Blк	[18+_Pop]	[18+_AP_Blк]
Dist. 001	765,137 (100.00%)	230,783 (100.00%)	589,266 (100.00%)	166,025 (100.00%)
Total and % Population		230,783 (30.16%)	589,266 (77.01%)	166,025 (21.70%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 002 --

765,137 Total Population

	Population	AP_Blк	[18+_Pop]	[18+_AP_Blк]
Dist. 002	765,137 (100.00%)	393,195 (100.00%)	587,555 (100.00%)	289,612 (100.00%)
Total and % Population		393,195 (51.39%)	587,555 (76.79%)	289,612 (37.85%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 003 --

765,135 Total Population

	Population	AP_Blк	[18+_Pop]	[18+_AP_Blк]
Dist. 003	528,200 (69.03%)	116,200 (69.96%)	405,092 (69.84%)	84,665 (71.32%)
Dist. 011	25,390 (3.32%)	2,782 (1.67%)	18,667 (3.22%)	1,887 (1.59%)
Dist. 014	211,545 (27.65%)	47,114 (28.37%)	156,259 (26.94%)	32,157 (27.09%)
Total and % Population		166,096 (21.71%)	580,018 (75.81%)	118,709 (15.51%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 004 --

765,136 Total Population

	Population	AP_Blк	[18+_Pop]	[18+_AP_Blк]
Dist. 004	736,485 (96.26%)	404,126 (98.56%)	568,345 (96.23%)	307,307 (98.60%)
Dist. 010	28,651 (3.74%)	5,893 (1.44%)	22,295 (3.77%)	4,363 (1.40%)
Total and % Population		410,019 (53.59%)	590,640 (77.19%)	311,670 (40.73%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 005 --

765,137 Total Population

	Population	AP_Blк	[18+_Pop]	[18+_AP_Blк]
Dist. 005	765,137 (100.00%)	392,822 (100.00%)	621,515 (100.00%)	308,271 (100.00%)
Total and % Population		392,822 (51.34%)	621,515 (81.23%)	308,271 (40.29%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 006 --

765,137 Total Population

	Population	AP_Blк	[18+_Pop]	[18+_AP_Blк]
Dist. 003	47,113 (6.16%)	14,639 (3.69%)	35,601 (6.06%)	10,334 (3.50%)

Core Constituencies

Pendergrass_cooper_CD_ILLUS_1205

Dist. 006	19,006 (2.48%)	5,246 (1.32%)	15,188 (2.59%)	4,076 (1.38%)
Dist. 011	230,468 (30.12%)	75,341 (18.98%)	183,874 (31.31%)	58,280 (19.76%)
Dist. 013	390,667 (51.06%)	263,484 (66.39%)	293,697 (50.01%)	194,921 (66.08%)
Dist. 014	77,883 (10.18%)	38,181 (9.62%)	58,887 (10.03%)	27,365 (9.28%)
Total and % Population		396,891 (51.87%)	587,247 (76.75%)	294,976 (38.55%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 007 -- 765,137 Total Population

	Population	AP_Blk	[18+_Pop]	[18+_AP_Blk]
Dist. 007	765,137 (100.00%)	239,717 (100.00%)	566,934 (100.00%)	169,071 (100.00%)
Total and % Population		239,717 (31.33%)	566,934 (74.10%)	169,071 (22.10%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 008 -- 765,136 Total Population

	Population	AP_Blk	[18+_Pop]	[18+_AP_Blk]
Dist. 008	765,136 (100.00%)	241,628 (100.00%)	585,857 (100.00%)	175,967 (100.00%)
Total and % Population		241,628 (31.58%)	585,857 (76.57%)	175,967 (23.00%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 009 -- 765,136 Total Population

	Population	AP_Blk	[18+_Pop]	[18+_AP_Blk]
Dist. 006	286,038 (37.38%)	18,257 (19.41%)	206,254 (36.55%)	12,099 (18.39%)
Dist. 009	403,191 (52.70%)	69,654 (74.05%)	301,539 (53.44%)	49,423 (75.12%)
Dist. 010	75,907 (9.92%)	6,148 (6.54%)	56,451 (10.00%)	4,268 (6.49%)
Total and % Population		94,059 (12.29%)	564,244 (73.74%)	65,790 (8.60%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 010 -- 765,137 Total Population

	Population	AP_Blk	[18+_Pop]	[18+_AP_Blk]
Dist. 009	276,752 (36.17%)	16,711 (14.14%)	220,493 (36.62%)	11,858 (13.76%)
Dist. 010	488,385 (63.83%)	101,488 (85.86%)	381,634 (63.38%)	74,320 (86.24%)
Total and % Population		118,199 (15.45%)	602,127 (78.70%)	86,178 (11.26%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 011 -- 765,137 Total Population

	Population	AP_Blk	[18+_Pop]	[18+_AP_Blk]
Dist. 006	392,413 (51.29%)	53,487 (48.46%)	300,712 (51.07%)	39,595 (49.18%)
Dist. 011	372,724 (48.71%)	56,881 (51.54%)	288,083 (48.93%)	40,912 (50.82%)
Total and % Population		110,368 (14.42%)	588,795 (76.95%)	80,507 (10.52%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 012 -- 765,136 Total Population

	Population	AP_Blk	[18+_Pop]	[18+_AP_Blk]
Dist. 012	765,136 (100.00%)	294,961 (100.00%)	588,119 (100.00%)	215,958 (100.00%)
Total and % Population		294,961 (38.55%)	588,119 (76.86%)	215,958 (28.22%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District 013 -- 765,135 Total Population

Core Constituencies

Pendergrass_cooper_CD_ILLUS_1205

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 003	189,823 (24.81%)	58,108 (14.35%)	145,626 (25.27%)	41,709 (14.15%)
Dist. 004	28,650 (3.74%)	19,637 (4.85%)	21,125 (3.67%)	14,072 (4.78%)
Dist. 010	172,192 (22.50%)	70,608 (17.44%)	128,494 (22.29%)	50,146 (17.02%)
Dist. 013	374,470 (48.94%)	256,610 (63.37%)	281,092 (48.77%)	188,742 (64.05%)
Total and % Population		404,963 (52.93%)	576,337 (75.32%)	294,669 (38.51%)

Plan: Pendergrass_cooper_CD_ILLUS_1205, District**765,135 Total Population****014 --**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 006	67,679 (8.85%)	1,881 (4.23%)	52,643 (8.90%)	1,199 (3.92%)
Dist. 009	85,194 (11.13%)	765 (1.72%)	70,488 (11.91%)	466 (1.52%)
Dist. 011	136,555 (17.85%)	8,400 (18.90%)	104,577 (17.68%)	5,732 (18.74%)
Dist. 014	475,707 (62.17%)	33,399 (75.15%)	363,912 (61.51%)	23,186 (75.81%)
Total and % Population		44,445 (5.81%)	591,620 (77.32%)	30,583 (4.00%)

EXHIBIT 8

User:

Plan Name: GA_Congress2021

Plan Type:

Core Constituencies

Core Constituencies

GA_Congress2021

From Plan: GA_Congress2012

Plan: GA_Congress2021, District 001 --

765,137 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 1	739,028 (96.59%)	226,452 (98.12%)	569,747 (96.69%)	163,067 (98.22%)
Dist. 12	26,109 (3.41%)	4,331 (1.88%)	19,519 (3.31%)	2,958 (1.78%)
Total and % Population		230,783 (30.16%)	589,266 (77.01%)	166,025 (21.70%)

Plan: GA_Congress2021, District 002 --

765,137 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 2	647,722 (84.65%)	347,410 (88.36%)	498,489 (84.84%)	257,276 (88.83%)
Dist. 3	20,569 (2.69%)	4,964 (1.26%)	15,865 (2.70%)	3,497 (1.21%)
Dist. 8	96,846 (12.66%)	40,821 (10.38%)	73,201 (12.46%)	28,839 (9.96%)
Total and % Population		393,195 (51.39%)	587,555 (76.79%)	289,612 (37.85%)

Plan: GA_Congress2021, District 003 --

765,136 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 13	56,242 (7.35%)	20,156 (10.67%)	42,420 (7.23%)	14,191 (10.38%)
Dist. 14	29,919 (3.91%)	1,541 (0.82%)	22,854 (3.90%)	1,106 (0.81%)
Dist. 2	1,666 (0.22%)	508 (0.27%)	1,269 (0.22%)	360 (0.26%)
Dist. 3	677,309 (88.52%)	166,742 (88.25%)	519,776 (88.65%)	121,051 (88.55%)
Total and % Population		188,947 (24.69%)	586,319 (76.63%)	136,708 (17.87%)

Plan: GA_Congress2021, District 004 --

765,135 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 10	85 (0.01%)	38 (0.01%)	60 (0.01%)	27 (0.01%)
Dist. 4	540,040 (70.58%)	386,678 (91.25%)	413,347 (70.12%)	291,139 (90.59%)
Dist. 5	28,730 (3.75%)	5,506 (1.30%)	24,203 (4.11%)	4,868 (1.51%)
Dist. 6	196,280 (25.65%)	31,541 (7.44%)	151,860 (25.76%)	25,345 (7.89%)
Total and % Population		423,763 (55.38%)	589,470 (77.04%)	321,379 (42.00%)

Plan: GA_Congress2021, District 005 --

765,137 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 11	47,174 (6.17%)	5,004 (1.27%)	37,405 (6.02%)	4,153 (1.35%)
Dist. 4	16,869 (2.20%)	4,687 (1.19%)	13,528 (2.18%)	3,828 (1.24%)
Dist. 5	663,383 (86.70%)	377,584 (96.12%)	539,965 (86.88%)	295,598 (95.89%)
Dist. 6	37,711 (4.93%)	5,547 (1.41%)	30,617 (4.93%)	4,692 (1.52%)
Total and % Population		392,822 (51.34%)	621,515 (81.23%)	308,271 (40.29%)

Plan: GA_Congress2021, District 006 --

765,136 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
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Core Constituencies

GA_Congress2021

Dist. 11	47,848 (6.25%)	4,044 (5.13%)	36,735 (6.39%)	2,933 (5.15%)
Dist. 6	404,452 (52.86%)	56,178 (71.23%)	310,367 (54.00%)	41,688 (73.18%)
Dist. 7	218,071 (28.50%)	15,481 (19.63%)	156,265 (27.19%)	10,353 (18.17%)
Dist. 9	94,765 (12.39%)	3,168 (4.02%)	71,430 (12.43%)	1,995 (3.50%)
Total and % Population		78,871 (10.31%)	574,797 (75.12%)	56,969 (7.45%)

Plan: GA_Congress2021, District 007 --

765,137 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 10	39,299 (5.14%)	15,361 (6.41%)	28,058 (4.95%)	10,430 (6.17%)
Dist. 4	197,348 (25.79%)	80,190 (33.45%)	144,997 (25.58%)	56,828 (33.61%)
Dist. 6	92,558 (12.10%)	11,462 (4.78%)	69,229 (12.21%)	8,135 (4.81%)
Dist. 7	435,932 (56.97%)	132,704 (55.36%)	324,650 (57.26%)	93,678 (55.41%)
Total and % Population		239,717 (31.33%)	566,934 (74.10%)	169,071 (22.10%)

Plan: GA_Congress2021, District 008 --

765,136 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 1	16,753 (2.19%)	4,143 (1.71%)	12,358 (2.11%)	2,783 (1.58%)
Dist. 10	43,799 (5.72%)	18,985 (7.86%)	35,732 (6.10%)	14,515 (8.25%)
Dist. 12	57,871 (7.56%)	15,068 (6.24%)	43,275 (7.39%)	10,943 (6.22%)
Dist. 2	23,640 (3.09%)	10,075 (4.17%)	18,387 (3.14%)	7,260 (4.13%)
Dist. 8	623,073 (81.43%)	193,357 (80.02%)	476,105 (81.27%)	140,466 (79.83%)
Total and % Population		241,628 (31.58%)	585,857 (76.57%)	175,967 (23.00%)

Plan: GA_Congress2021, District 009 --

765,137 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 10	44,291 (5.79%)	9,679 (11.11%)	31,842 (5.37%)	6,461 (10.46%)
Dist. 7	205,437 (26.85%)	44,718 (51.32%)	154,876 (26.14%)	32,017 (51.85%)
Dist. 9	515,409 (67.36%)	32,733 (37.57%)	405,802 (68.49%)	23,269 (37.68%)
Total and % Population		87,130 (11.39%)	592,520 (77.44%)	61,747 (8.07%)

Plan: GA_Congress2021, District 010 --

765,135 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 10	537,046 (70.19%)	116,915 (63.49%)	417,641 (70.92%)	85,228 (64.03%)
Dist. 3	65,197 (8.52%)	38,319 (20.81%)	47,834 (8.12%)	26,835 (20.16%)
Dist. 4	19,504 (2.55%)	7,099 (3.86%)	15,130 (2.57%)	5,230 (3.93%)
Dist. 9	143,388 (18.74%)	21,804 (11.84%)	108,269 (18.39%)	15,804 (11.87%)
Total and % Population		184,137 (24.07%)	588,874 (76.96%)	133,097 (17.40%)

Plan: GA_Congress2021, District 011 --

765,137 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 11	678,876 (88.73%)	130,505 (91.01%)	527,173 (88.57%)	96,925 (90.74%)
Dist. 13	18,253 (2.39%)	5,521 (3.85%)	13,702 (2.30%)	4,171 (3.91%)
Dist. 14	11,411 (1.49%)	127 (0.09%)	8,924 (1.50%)	72 (0.07%)
Dist. 6	34,792 (4.55%)	6,866 (4.79%)	27,527 (4.62%)	5,396 (5.05%)
Dist. 9	21,805 (2.85%)	385 (0.27%)	17,875 (3.00%)	247 (0.23%)
Total and % Population		143,404 (18.74%)	595,201 (77.79%)	106,811 (13.96%)

Plan: GA_Congress2021, District 012 --

765,136 Total Population

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 10	110,492 (14.44%)	43,475 (14.74%)	85,822 (14.59%)	32,735 (15.16%)

Core Constituencies

GA_Congress2021

Dist. 12	654,644 (85.56%)	251,486 (85.26%)	502,297 (85.41%)	183,223 (84.84%)
Total and % Population		294,961 (38.55%)	588,119 (76.86%)	215,958 (28.22%)

Plan: GA_Congress2021, District 013 --**765,137 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 11	10,809 (1.41%)	3,601 (0.69%)	8,012 (1.39%)	2,682 (0.70%)
Dist. 13	658,315 (86.04%)	449,173 (86.36%)	495,032 (86.12%)	330,775 (86.21%)
Dist. 5	96,013 (12.55%)	67,320 (12.94%)	71,745 (12.48%)	50,206 (13.09%)
Total and % Population		520,094 (67.97%)	574,789 (75.12%)	383,663 (50.14%)

Plan: GA_Congress2021, District 014 --**765,135 Total Population**

	Population	AP_Bl	[18+_Pop]	[18+_AP_Bl]
Dist. 11	17,808 (2.33%)	4,001 (3.37%)	13,434 (2.32%)	2,721 (3.29%)
Dist. 13	60,106 (7.86%)	34,182 (28.80%)	45,476 (7.85%)	24,646 (29.80%)
Dist. 14	687,221 (89.82%)	80,511 (67.83%)	520,148 (89.83%)	55,341 (66.91%)
Total and % Population		118,694 (15.51%)	579,058 (75.68%)	82,708 (10.81%)

EXHIBIT 9

User:

Plan Name: GA_Pendergrass_Cooper_Remedial

Plan Type:

Plan Components with Population Detail

Plan Components with Population Detail

GA_Pendergrass_Cooper_Remedial

	Total Population	AP_Blk
District 003		
County: Carroll GA		
Total:	119,148	24,618 20.66%
Voting Age	90,996	17,827 19.59%
County: Coweta GA		
Total:	146,158	28,289 19.36%
Voting Age	111,155	20,196 18.17%
County: Douglas GA		
Total:	25,423	6,628 26.07%
Voting Age	19,300	4,623 23.95%
County: Haralson GA		
Total:	29,919	1,541 5.15%
Voting Age	22,854	1,106 4.84%
County: Harris GA		
Total:	34,668	5,742 16.56%
Voting Age	26,799	4,431 16.53%
County: Heard GA		
Total:	11,412	1,142 10.01%
Voting Age	8,698	832 9.57%
County: Lamar GA		
Total:	18,500	5,220 28.22%
Voting Age	14,541	4,017 27.63%
County: Meriwether GA		
Total:	20,613	7,547 36.61%
Voting Age	16,526	5,845 35.37%
County: Muscogee GA		
Total:	31,767	6,691 21.06%

Plan Components with Population Detail

GA_Pendergrass_Cooper_Remedial

Voting Age	24,894	4,753 19.09%
County: Paulding GA		
Total:	168,661	41,296 24.48%
Voting Age	123,998	28,164 22.71%
County: Pike GA		
Total:	18,889	1,613 8.54%
Voting Age	14,337	1,254 8.75%
County: Polk GA		
Total:	42,853	5,816 13.57%
Voting Age	32,238	3,991 12.38%
County: Troup GA		
Total:	69,426	25,473 36.69%
Voting Age	52,581	18,202 34.62%
County: Upson GA		
Total:	27,700	8,324 30.05%
Voting Age	21,711	6,202 28.57%
District 003 Total		
Total:	765,137	169,940 22.21%
Voting Age	580,628	121,443 20.92%
District 004		
County: DeKalb GA		
Total:	601,451	322,421 53.61%
Voting Age	465,661	247,548 53.16%
County: Newton GA		
Total:	70,114	27,419 39.11%
Voting Age	53,424	19,966 37.37%
County: Rockdale GA		
Total:	93,570	57,204 61.13%
Voting Age	71,503	41,935 58.65%
District 004 Total		
Total:	765,135	407,044 53.20%
Voting Age	590,588	309,449 52.40%
District 006		

Plan Components with Population Detail

GA_Pendergrass_Cooper_Remedial

County: Cobb GA		
Total:	477,809	181,135 37.91%
Voting Age	372,324	136,145 36.57%
County: Douglas GA		
Total:	118,814	67,632 56.92%
Voting Age	89,128	48,754 54.70%
County: Fayette GA		
Total:	4,143	1,883 45.45%
Voting Age	3,300	1,460 44.24%
County: Fulton GA		
Total:	164,371	146,286 89.00%
Voting Age	123,766	109,273 88.29%
District 006 Total		
Total:	765,137	396,936 51.88%
Voting Age	588,518	295,632 50.23%
District 009		
County: Forsyth GA		
Total:	251,283	13,222 5.26%
Voting Age	181,193	8,751 4.83%
County: Gwinnett GA		
Total:	284,483	59,432 20.89%
Voting Age	211,779	41,826 19.75%
County: Hall GA		
Total:	153,463	15,257 9.94%
Voting Age	114,821	10,945 9.53%
County: Jackson GA		
Total:	75,907	6,148 8.10%
Voting Age	56,451	4,268 7.56%
District 009 Total		
Total:	765,136	94,059 12.29%
Voting Age	564,244	65,790 11.66%
District 010		
County: Banks GA		
Total:	18,035	589

Plan Components with Population Detail

GA_Pendergrass_Cooper_Remedial

		3.27%
Voting Age	13,900	365
		2.63%
County: Barrow GA		
Total:	83,505	11,907
		14.26%
Voting Age	62,195	8,222
		13.22%
County: Clarke GA		
Total:	128,671	33,672
		26.17%
Voting Age	106,830	24,776
		23.19%
County: Elbert GA		
Total:	19,637	5,520
		28.11%
Voting Age	15,493	4,122
		26.61%
County: Franklin GA		
Total:	23,424	2,207
		9.42%
Voting Age	18,307	1,523
		8.32%
County: Greene GA		
Total:	18,915	6,027
		31.86%
Voting Age	15,358	4,470
		29.11%
County: Habersham GA		
Total:	46,031	2,165
		4.70%
Voting Age	35,878	1,675
		4.67%
County: Hall GA		
Total:	49,673	1,749
		3.52%
Voting Age	39,023	1,149
		2.94%
County: Hancock GA		
Total:	8,735	6,131
		70.19%
Voting Age	7,487	5,108
		68.22%
County: Hart GA		
Total:	25,828	4,732
		18.32%
Voting Age	20,436	3,447
		16.87%
County: Lumpkin GA		
Total:	29,598	643
		2.17%
Voting Age	24,614	482
		1.96%
County: Madison GA		

Plan Components with Population Detail

GA_Pendergrass_Cooper_Remedial

Total:	30,120	3,196
		10.61%
Voting Age	23,112	2,225
		9.63%
County: Morgan GA		
Total:	20,097	4,339
		21.59%
Voting Age	15,574	3,280
		21.06%
County: Oconee GA		
Total:	41,799	2,280
		5.45%
Voting Age	30,221	1,660
		5.49%
County: Oglethorpe GA		
Total:	14,825	2,468
		16.65%
Voting Age	11,639	1,853
		15.92%
County: Putnam GA		
Total:	22,047	5,701
		25.86%
Voting Age	17,847	4,229
		23.70%
County: Rabun GA		
Total:	16,883	210
		1.24%
Voting Age	13,767	129
		0.94%
County: Stephens GA		
Total:	26,784	3,527
		13.17%
Voting Age	21,163	2,467
		11.66%
County: Taliaferro GA		
Total:	1,559	876
		56.19%
Voting Age	1,289	722
		56.01%
County: Towns GA		
Total:	12,493	168
		1.34%
Voting Age	10,923	137
		1.25%
County: Walton GA		
Total:	96,673	18,804
		19.45%
Voting Age	73,098	13,165
		18.01%
County: White GA		
Total:	28,003	721
		2.57%
Voting Age	22,482	484
		2.15%

Plan Components with Population Detail

GA_Pendergrass_Cooper_Remedial

County: Wilkes GA		
Total:	1,802	567
		31.47%
Voting Age	1,491	488
		32.73%
District 010 Total		
Total:	765,137	118,199
		15.45%
Voting Age	602,127	86,178
		14.31%
District 011		
County: Bartow GA		
Total:	108,901	13,395
		12.30%
Voting Age	83,570	9,377
		11.22%
County: Cherokee GA		
Total:	122,400	12,310
		10.06%
Voting Age	93,948	8,613
		9.17%
County: Cobb GA		
Total:	288,340	41,981
		14.56%
Voting Age	219,524	29,996
		13.66%
County: Fulton GA		
Total:	245,494	39,678
		16.16%
Voting Age	190,172	29,939
		15.74%
District 011 Total		
Total:	765,135	107,364
		14.03%
Voting Age	587,214	77,925
		13.27%
District 013		
County: Butts GA		
Total:	25,434	7,212
		28.36%
Voting Age	20,360	5,660
		27.80%
County: Clayton GA		
Total:	259,676	188,757
		72.69%
Voting Age	192,693	138,553
		71.90%
County: Fayette GA		
Total:	115,051	30,193
		26.24%
Voting Age	88,498	22,268
		25.16%
County: Henry GA		
Total:	240,712	125,211

Plan Components with Population Detail

GA_Pendergrass_Cooper_Remedial

		52.02%
Voting Age	179,973	89,657
		49.82%
County: Jasper GA		
Total:	14,588	2,676
		18.34%
Voting Age	11,118	1,966
		17.68%
County: Newton GA		
Total:	42,369	28,482
		67.22%
Voting Age	31,324	20,467
		65.34%
County: Spalding GA		
Total:	67,306	24,522
		36.43%
Voting Age	52,123	17,511
		33.60%
District 013 Total		
Total:	765,136	407,053
		53.20%
Voting Age	576,089	296,082
		51.40%
District 014		
County: Catoosa GA		
Total:	67,872	2,642
		3.89%
Voting Age	52,448	1,684
		3.21%
County: Chattooga GA		
Total:	24,965	2,865
		11.48%
Voting Age	19,416	2,235
		11.51%
County: Cherokee GA		
Total:	144,220	9,377
		6.50%
Voting Age	108,980	6,363
		5.84%
County: Dade GA		
Total:	16,251	228
		1.40%
Voting Age	12,987	140
		1.08%
County: Dawson GA		
Total:	26,798	392
		1.46%
Voting Age	21,441	249
		1.16%
County: Fannin GA		
Total:	25,319	199
		0.79%
Voting Age	21,188	133
		0.63%

Plan Components with Population Detail

GA_Pendergrass_Cooper_Remedial

County: Floyd GA		
Total:	98,584	15,606 15.83%
Voting Age	76,295	11,064 14.50%
County: Gilmer GA		
Total:	31,353	296 0.94%
Voting Age	25,417	161 0.63%
County: Gordon GA		
Total:	57,544	2,919 5.07%
Voting Age	43,500	1,939 4.46%
County: Lumpkin GA		
Total:	3,890	42 1.08%
Voting Age	3,075	25 0.81%
County: Murray GA		
Total:	39,973	556 1.39%
Voting Age	30,210	321 1.06%
County: Pickens GA		
Total:	33,216	512 1.54%
Voting Age	26,799	319 1.19%
County: Union GA		
Total:	24,632	228 0.93%
Voting Age	20,808	147 0.71%
County: Walker GA		
Total:	67,654	3,664 5.42%
Voting Age	52,794	2,454 4.65%
County: Whitfield GA		
Total:	102,864	4,919 4.78%
Voting Age	76,262	3,349 4.39%
District 014 Total		
Total:	765,135	44,445 5.81%
Voting Age	591,620	30,583 5.17%

EXHIBIT 7

EXPERT REPORT OF JOHN R. ALFORD, Ph.D.

Scope of Inquiry

I have been retained by the Georgia Secretary of State and State Election Board as an expert to provide analysis related to *Grant v. Raffensperger*, *Alpha Phi Alpha v. Raffensperger*, and *Pendergrass v. Raffensperger*. All three cases allege the current U.S. Congressional, state Senate, and state House districts in Georgia violate Section 2 of the Voting Rights Act. In early 2022, I provided a report and testified in the preliminary injunction hearing in this matter. I have examined the reports and supplemental reports provided by plaintiffs' experts Dr. Maxwell Palmer, and Dr. Lisa Handley in this case. My rate of compensation in this matter is \$500 per hour.

Qualifications

I am a tenured full professor of political science at Rice University. At Rice, I have taught courses on redistricting, elections, political representation, voting behavior and statistical methods at both the undergraduate and graduate level. Over the last thirty years, I have worked with numerous local governments on districting plans and on Voting Rights Act issues. I have previously provided expert reports and/or testified as an expert witness in voting rights and statistical issues in a variety of court cases, including on behalf of the U.S. Attorney in Houston, the Texas Attorney General, a U.S. Congressman, and various cities and school districts.

In the 2000 round of redistricting, I was retained as an expert to provide advice to the Texas Attorney General in his role as Chair of the Legislative Redistricting Board. I subsequently served as the expert for the State of Texas in the state and federal litigation involving the 2001 redistricting for U.S. Congress, the Texas Senate, the Texas House of Representatives, and the Texas State Board of Education. In the 2010 round of redistricting in Texas, I was again retained as an expert by the State of Texas to assist in defending various state election maps and systems including the district maps for the U.S. Congress, the Texas Senate, the Texas House of Representatives, and the current at large system for electing Justices to the State Supreme Court

and Court of Appeals, as well as the winner-take-all system for allocating Electoral College votes.

I have also worked as an expert on redistricting and voting rights cases at the state and/or local level in Alabama, Arkansas, Florida, Georgia, Kansas, Louisiana, Michigan, Mississippi, New Mexico, New York, Pennsylvania, Washington, and Wisconsin. The details of my academic background, including all publications in the last ten years, and work as an expert, including all cases in which I have testified by deposition or at trial in the last four years, are covered in the attached CV (Appendix 1).

Data and Sources

In preparing this report, I have reviewed the reports filed by the plaintiffs' experts in this case. I have relied on the analysis provided to date by Dr. Palmer and Dr. Handley in their expert reports in this case. I have also relied on various election and demographic data provided by Dr. Palmer and Dr. Handley in their disclosures related to their reports in this case. In addition, I relied on data on turnout by race for the 2022 Republican Primary election provided to counsel by the Georgia Secretary of State, and 2022 precinct-level election results for that election downloaded from the publicly available website of the Georgia Secretary of State.

Dr. Palmer's Reports

Dr. Palmer, in his report in *Pendergrass v. Raffensperger* dated 12/12/2022, provides the results of an EI election analysis that he used to assess Racially Polarized Voting (RPV) in each of 40 contests between 2012 and 2022, and reports the results in his Tables 1 through 6 for five U.S. Congressional districts and as a combined focus area. Similarly, in his report in *Grant v. Raffensperger* dated 12/12/2022, Dr. Palmer provides the EI results for the same 40 contests between 2012 and 2022 as reported in his Tables 2 through 6, for three Georgia House and two Georgia Senate focus areas. The race of the candidate preferred by Black voters is indicated in Dr. Palmer's tables with an asterisk by the name of each Black candidate, and the absence of an asterisk indicating a non-Black candidate. Across the 40 reported contests 19 of the preferred candidates are Black and 21 are non-Black, providing an ideal, almost equal distribution, for comparing both Black and white voter support for Black-preferred candidates that happen to be Black, with Black voter support for Black-preferred candidates that happen not to be Black.

However, despite having this data identified in his reports and the associated opportunity analyze it, there is no discussion of the impact, if any, that the race of the candidate might have on the behavior of Black or white voters in these contests. Also, Dr. Palmer provides no party labels in these tables, and does not mention the party of candidates in his discussion of the results of his analysis.

As evident in Dr. Palmer's Tables 1-6 in his *Pendergrass* report, and Tables 2-6 in his *Grant* report, the pattern of polarization is quite striking. Black voter support for their preferred candidate is typically in the 90 percent range and scarcely varies at all across the ten years examined from 2012 to 2022. Nor does it vary in any meaningful degree from the top of the ballot elections for U.S. President to down-ballot contests like Public Service Commissioner. While slightly more varied, estimated white voter opposition to the Black-preferred candidate is typically above 80 percent. In the *Pendergrass* Table 1 for the combined focus area, Dr. Palmer reports estimates of Black voter support that only varies between 96 and 99 percent when results are rounded to the nearest percent. White voter opposition to the Black preferred candidate is slightly more varied, but still remarkably stable, ranging in *Pendergrass* Table 1 only from 84.5% to 91.4 percent.

What accounts for this remarkable stability in the divergent preferences of Black and white voters across years and offices? It is clearly not Black voter's preference for Black candidates, or white voter's disinclination to vote for Black candidates. At 98.5 percent, the average Black support for the 19 Black candidates identified as Black in Palmer's *Pendergrass* Table 1 is indeed nearly universal, but so is the average 98.4 percent support for the 21 candidates identified as non-Black in Table 1. Similarly, the average white vote in opposition to the 19 candidates identified as Black in *Pendergrass* Table 1 is a clearly cohesive 88.1 percent, but so is the average 87.1 percent white voter opposition to the 21 candidates identified as non-Black. The same can said for Dr. Palmer's results in his *Grant* report where, for example, the average Black support for the 19 candidates identified as Black in Table 2 is 98.2 percent, and Black voter support for the 21 candidates identified as non-Black is a nearly identical 98.1 percent. Similarly, the average white vote in opposition to the 19 candidates identified as Black in *Grant* Table 2 is a clearly cohesive 90.1 percent, but so is the average 89.1 percent white voter opposition to the 21 candidates identified as non-Black.

If we do consider the party affiliation of the candidates, the pattern over these election contests is stark in both the *Grant* report and the *Pendergrass* report. In all 40 contests the candidate of choice of Black voters is the Democrat and the candidate of choice of white voters is the Republican.

In contrast, the race of the candidates does not appear to be influential. Black voter support for Black Democratic candidates is certainly high, as Dr. Palmer's Tables 2 through 6 in *Grant* and Tables 1 through 5 in *Pendergrass* clearly show, but those same figures also show Black voter support in the same high range for white Democratic candidates as it is for Black Democratic candidates. Similarly, white voter support for Black Democratic candidates is very low, but white voter support for white Democratic candidates is also very low.¹ In other words, there appears to be just one overarching attribute of candidates that uniformly leads to their relative acceptability or unacceptability among white voters and Black voters alike. And it is not the candidate's race. It is their party affiliation.

For example, in the 2022 contest for Governor in Dr. Palmer's *Pendergrass* Table 1 (his combined focus region) Stacey Abrams, the Black Democratic candidate, gets an estimated 98.5% of the Black vote, but in the same election in the adjacent Lt. Governor contest Charlie Bailey, a white Democrat, gets an almost identical estimated 98.4% of the Black vote. Looking at White voters a similar pattern is clear. Abrams gets an estimated 10.3% of the white vote, but in the same election in the adjacent Lt. Governor contest Baily, the white Democrat, received a similar estimated 12.1% of the white vote.

Similarly, in the 2021 U.S. Senate runoffs in Dr. Palmer's *Pendergrass* Table 1 (his combined focus region) Raphael Warnock, the Black Democratic candidate gets an estimated 98.7% of the Black vote, but in the same election in the other Senate contest Jon Ossoff, a white Democrat gets an identical estimated 98.7% of the Black vote. Looking at white voters a similar pattern is clear. Warnock, the Black Democratic candidate, gets an estimated 15.2% of the white vote, but in the same election in the other Senate contest, Ossoff, the White Democrat, gets an almost identical estimated 14.5% of the white vote.

¹ The limited evidence from the 2022 endogenous elections provided in Dr. Palmer's supplemental reports do not contradict this broad pattern.

Moving beyond his EI analysis, Dr. Palmer also provides reconstituted election results to demonstrate the success rate of Black preferred candidates in his focus areas. Given that as mentioned above the Black preferred candidate is always the Democratic candidate and given the dominance of political party in the EI results as discussed above, it is no surprise that these tables show stable performance for Democratic candidates across the 40 contests, regardless of race. For example, in Dr. Palmer's Table 7 in his *Pendergrass* report, the average vote share for the Democratic candidate is 41.7 percent in the 19 contests where the Democratic candidate is Black, and a very similar 42.3 percent in the 21 contests where the Democratic candidate is not Black.

In short, all that Dr. Palmer's analysis demonstrates is that Black voters provide uniformly high levels of support for Democratic candidates and white voters provide uniformly high levels of support for Republican candidates. There is no indication in these EI results that the high levels of Black voter support for Democratic candidates is connected in any meaningful way to the race of the Democratic or Republican candidates. Similarly, there is no indication in these results that the high levels of white voter support for the Republican candidates is connected in any meaningful way to the race of the Democratic or Republican candidates.

Dr. Handley's Report

Dr. Handley's December 12, 2022 report in *Alpha Phi Alpha* focuses first on general elections, and reports results similar to those reported by Dr. Palmer. Black voters support Democratic candidates and white voters support Republican candidates. She indicates that she has chosen to focus on racially contested elections, so this limits the ability to see whether this partisan pattern varies at all with the race of the candidates, but in the two contests without a Black Democrat, the Ossoff 2020 Senate contest and 2021 runoff, the results for both Black and White voters are very similar to the results for the racially contested elections, as was the case in Dr. Palmer's larger set of general elections.

Unlike Dr. Palmer, Dr. Handley also analyzes eleven racially contested statewide Democratic primaries. The results in these primaries are very different from the general election patterns. The general election pattern is a very important contrast to keep in mind when evaluating the results for these eleven primary contests. In the general elections, Black support for the Democratic candidate is very high and very stable in the upper 90% range. Similarly,

White voter opposition to the Democratic candidates is also high and stable in the 80 percent and up range.

While there is not currently a bright-line court standard for determining the level of support needed under *Gingles* prongs 2 and 3 to demonstrate cohesion, multiple plaintiffs' experts have recently discussed a minimum of 60 percent threshold for cohesion in a two-person contest. Simply having a preferred candidate (50 percent plus 1 in a two-candidate contest) is not sufficient. This is, of course, true by definition. If simply having a preferred candidate was sufficient to establish cohesion, then the *Gingles* 2 threshold test would always be met in two candidate contests and thus not actually constitute a test at all. As Dr. Palmer notes on page 4 of his *Pendergrass* report, "[i]f the group's support is roughly evenly divided between the two candidates, then the group does not cohesively support a single candidate". Even if a more stringent 75 percent or 80 percent threshold was the cohesion threshold standard, the results for the general elections provided by both Dr. Palmer and Dr. Handley clearly establish partisan polarization, with Blacks always favoring Democratic candidates at stable levels well above 80 percent, and whites favoring Republican candidates at similarly stable levels, typically above 80 percent.

Applying the 60 percent threshold for cohesion to the 40 general election contests in Dr. Palmer's *Grant* report or the 40 general election contests in Dr. Palmer's *Pendergrass* report, produces the same clear result. In 40 out of 40 contests, Black voters provide cohesive support to the Democratic candidate and white voters provide cohesive support to the opposing Republican candidate. This unequivocal result is what Palmer references as supporting his conclusion of polarized voting. As he states on pages 5-6 of his December 12, 2022 *Grant* report:

Black voters are extremely cohesive, with a clear candidate of choice in all 40 elections. In contrast to Black voters, Figure 2 shows that White voters are highly cohesive in voting in opposition to the Black-preferred candidate in every election across the five focus areas. Table 1 lists the average level of support for the Black-preferred candidate for Black and White voters in each focus area. Across all five focus areas, Black voters support their preferred candidate with an average of 98.5% and a minimum of 95.2% of the vote, and White voters support Black-preferred candidates with an average of 8.3% and a maximum of 17.7% of the vote. This is strong evidence of racially polarized voting across all five focus areas.

The same can be said for the 16 general election contests that Dr. Handley includes for each of her seven focus regions as reported in her Appendix C1-C7. In every one of the 16 contests examined in all seven regions, Black voter support for the Democratic candidate clearly exceeds 60 percent and in all the regular elections (excluding the one 20 candidate special Senate election in 2020) exceeded 90 percent. White voters provided cohesive support to the opposing Republican candidates exceeding 60% in every contest with the sole exception of the 2022 Senate contest in Appendix 1, where the white estimated vote fell just short of 60 percent at 59.3 percent.

As Dr. Handley, herself, states on page 9 of her December 23, 2022 Report:

Overall, the average percentage of Black vote for the 16 Black-preferred candidates is 96.1%. The average percentage of White vote for these 16 Black-preferred candidates across the seven areas is 11.2%. (When Ossoff is excluded, and only Black-preferred Black candidates are considered, the average White vote is slightly lower: 11.1 %.) The highest average White vote for any of the 16 candidates is 14.4% for Raphael Warnock in his 2022 general election bid for re-election. While the percentage of White support for candidates preferred by Black voters varies across the areas, in five of the seven areas the average did not even reach 10%. White crossover voting was the highest in the Eastern Atlanta Metro Region (Map 1), but only about one third of White voters typically supported the Black-preferred Black candidates in this area.

She finds similarly clear evidence of polarization when she considers the analysis of state legislative elections included in her Appendix B1 and B2, stating on page 9 of her December 23, 2022:

Nearly every one of the 54 of the state legislative elections analyzed (53 of the 54 contests, or 98.1%) was racially polarized. The estimates of Black and White support for the state legislative candidates in these contests analyzed can be found in Appendices B1 (State Senate) and B2 (State House). Black voters were quite cohesive in supporting Black candidates in these state legislative contests: on average, 97.4% of Black voters supported their preferred Black state senate candidates, and 91.5% supported their preferred Black state house candidate. Very few White voters supported these candidates, however: Black-preferred Black state senate candidates garnered, on average, 10.1% of the White vote; Black-preferred Black state house candidates received, on average, 9.8% of the White vote.

Based on their summary descriptions of their general election analysis, it is clear that both Dr. Palmer and Dr. Handley know what a convincing pattern of polarization looks like. That clear pattern is not present once candidate party labels are removed from the contest. Dr. Palmer

makes no effort to address this issue of conflating polarization in support for Democratic versus Republican candidates with racial polarization. Dr. Handley attempts to address the issue by providing analysis for eleven Democratic primaries in each of her seven focus regions.

But looking at the Democratic primary contests, as reported in Dr. Handley's Appendix C1-C7, the contrast to the pattern in the partisan general elects is stark. As detailed above, the pattern of Black voter support for Democratic candidates and white voter support for their Republican opponents in general elections is near universal, and both Black and white voters show strong and highly stable levels of cohesion. In contrast the pattern Dr. Handley identifies in the Democratic primaries is far from universal or stable. The support of Black voters for Black candidates varies widely, and seldom reaches above 80 percent. Similarly, white voter support for Democratic candidates is typically below 20% in the general elections, but in the primaries white support for Black candidates varies widely and is often fairly evenly divided. In many of the contests within Dr. Handley's six focus regions, for example, the votes of Blacks, whites, or both are divided too evenly to characterize the voting as cohesive. Even ignoring any concern for establishing minority or majority cohesion and applying a very loose standard of Blacks and whites simply preferring different candidates, Dr. Handley is only able to conclude that "the majority (55.8%) of the contests I analyzed were racially polarized" (page 10), a level not much above chance, and far below the 100 percent or 98.1 percent reported for general elections.

If we consider the *Gingles* 2 and 3 cohesion thresholds, even this slight result disappears. Using even a modest 60% standard for voter cohesion, Black voters vote cohesively for Black candidates in only 35 contests out of 77 (46 percent). If we add the instances where Blacks vote cohesively for white candidate that rises to 49 contests (64 percent of the 77 total). In those 49 contests, white voters cohesively opposed the Black preference in only 10 contests (20 percent of the 49 contests).

Herschel Walker Senate Race

The recent 2022 Republican U.S. Senate primary provides an additional racially contested primary to consider. Among the six candidates, the majority winner was Herschel Walker, one of the three Black candidates. Given that Black voters were less than 12 percent of the voters in any county in the state in that primary, and that Walker received a majority of the vote in every county in Georgia, it is clear the Walker was the preferred candidate among White voters

in the Republican primary. This can be seen as well in an initial look at EI estimates for the area covered in Dr. Handley's Appendix A1, reproduced below in Table 1 (Eastern Atlanta Metro Region – Map Area 1, Dekalb, Henry, Morgan, Newton, Rockdale, and Walton). With an estimated 62 percent support among Black voters, and 67 percent support among white voters, Walker is the preferred candidate of both Black and white voters in the Republican primary.

Table 1; Ecological Estimates of Voting Patterns by Race in the 2022 Republican U.S. Senate Primary for Dr. Handley's Eastern Atlanta Metro Region

			95% Confidence Interval			95% Confidence Interval			95% Confidence Interval	
Last Name	Candidate Race	Black support	Low	High	White Support	Low	High	Other Support	Low	High
Herschel Walker	Black	62.4%	57.8%	67.4%	67.0%	66.3%	67.6%	5.3%	1.8%	11.7%
Kelvin King	Black	10.1%	7.7%	12.8%	2.5%	2.0%	3.0%	17.5%	12.5%	22.5%
"Jon" McCollum	Black	3.0%	1.7%	4.8%	0.9%	0.6%	1.2%	22.4%	18.8%	25.4%
Gary Black	white	12.8%	9.6%	16.2%	15.3%	14.5%	16.0%	9.3%	3.3%	17.0%
Latham Saddler	white	7.1%	4.1%	10.7%	12.7%	11.9%	13.5%	15.7%	7.8%	24.0%
Josh Clark	white	4.5%	2.7%	6.8%	1.6%	1.1%	2.2%	29.8%	23.7%	35.3%

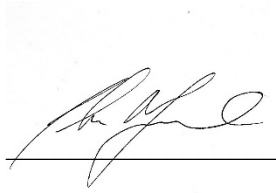
Summary Conclusions

The partisan general election analysis report by Dr. Palmer and Dr. Handley show that Black voters cohesively support Democratic candidates, regardless of whether those candidates are Black or White. Similarly, white voters cohesively vote for Republican candidates, and in opposition to Democratic candidates, regardless of whether those Democratic candidates are Black or white. Thus, it is cohesive Black voter support for *Democratic* candidates, and white voter support for *Republican* candidates that the general election analysis reveals, not cohesive Black voter support for *Black* candidates and white voter support for *white* candidates.

Nonetheless, the voting pattern is clearly one of partisan polarized voting, with both highly cohesive Black vote for the Democrat and highly cohesive white vote for the Republican candidate. The more limited analysis of Democratic primaries reported by Dr. Handley shows a very different picture of voting behavior from the general elections. Nothing even approaching the levels of Black and white cohesion seen in the general elections appears anywhere in the

primary contests, and the overall patterns are mixed and variable even within the same set of voters on the same day as we see in the multiple contests in the 2018 Democratic primary. Similarly, the 2022 U.S. Senate Republican primary indicates that white Republican primary voters are willing to support a Black Republican candidate over multiple white opponents.

February 6, 2023

A handwritten signature in black ink, appearing to read 'John R. Alford', is written over a horizontal line.

John R. Alford, Ph.D.

Appendix 1

CV

John R. Alford

Curriculum Vitae

January 2023

Dept. of Political Science
Rice University - MS-24
P.O. Box 1892
Houston, Texas 77251-1892
713-348-3364
jra@rice.edu

Employment:

Professor, Rice University, 2015 to present.
Associate Professor, Rice University, 1985-2015.
Assistant Professor, University of Georgia, 1981-1985.
Instructor, Oakland University, 1980-1981.
Teaching-Research Fellow, University of Iowa, 1977-1980.
Research Associate, Institute for Urban Studies, Houston, Texas, 1976-1977.

Education:

Ph.D., University of Iowa, Political Science, 1981.
M.A., University of Iowa, Political Science, 1980.
M.P.A., University of Houston, Public Administration, 1977.
B.S., University of Houston, Political Science, 1975.

Books:

Predisposed: Liberals, Conservatives, and the Biology of Political Differences. New York: Routledge, 2013. Co-authors, John R. Hibbing and Kevin B. Smith.

Articles:

“Political Orientations Vary with Detection of Androstenone,” with Amanda Friesen, Michael Gruszczynski, and Kevin B. Smith. **Politics and the Life Sciences**. (Spring, 2020).

“Intuitive ethics and political orientations: Testing moral foundations as a theory of political ideology.” with Kevin Smith, John Hibbing, Nicholas Martin, and Peter Hatemi. **American Journal of Political Science**. (April, 2017).

“The Genetic and Environmental Foundations of Political, Psychological, Social, and Economic Behaviors: A Panel Study of Twins and Families.” with Peter Hatemi, Kevin Smith, and John Hibbing. **Twin Research and Human Genetics**. (May, 2015.)

“Liberals and conservatives: Non-convertible currencies.” with John R. Hibbing and Kevin B. Smith. **Behavioral and Brain Sciences** (January, 2015).

“Non-Political Images Evoke Neural Predictors Of Political Ideology.” with Woo-Young Ahn, Kenneth T. Kishida, Xiaosi Gu, Terry Lohrenz, Ann Harvey, Kevin Smith, Gideon Yaffe, John Hibbing, Peter Dayan, P. Read Montague. **Current Biology**. (November, 2014).

“Cortisol and Politics: Variance in Voting Behavior is Predicted by Baseline Cortisol Levels.” with Jeffrey French, Kevin Smith, Adam Guck, Andrew Birnie, and John Hibbing. **Physiology & Behavior**. (June, 2014).

“Differences in Negativity Bias Underlie Variations in Political Ideology.” with Kevin B. Smith and John R. Hibbing. **Behavioral and Brain Sciences**. (June, 2014).

“Negativity bias and political preferences: A response to commentators Response.” with Kevin B. Smith and John R. Hibbing. **Behavioral and Brain Sciences**. (June, 2014).

“Genetic and Environmental Transmission of Political Orientations.” with Carolyn L. Funk, Matthew Hibbing, Kevin B. Smith, Nicholas R. Eaton, Robert F. Krueger, Lindon J. Eaves, John R. Hibbing. **Political Psychology**, (December, 2013).

“Biology, Ideology, and Epistemology: How Do We Know Political Attitudes Are Inherited and Why Should We Care?” with Kevin Smith, Peter K. Hatemi, Lindon J. Eaves, Carolyn Funk, and John R. Hibbing. **American Journal of Political Science**. (January, 2012)

“Disgust Sensitivity and the Neurophysiology of Left-Right Political Orientations.” with Kevin Smith, John Hibbing, Douglas Oxley, and Matthew Hibbing, **PlosONE**, (October, 2011).

“Linking Genetics and Political Attitudes: Re-Conceptualizing Political Ideology.” with Kevin Smith, John Hibbing, Douglas Oxley, and Matthew Hibbing, **Political Psychology**, (June, 2011).

“The Politics of Mate Choice.” with Peter Hatemi, John R. Hibbing, Nicholas Martin and Lindon Eaves, **Journal of Politics**, (March, 2011).

“Not by Twins Alone: Using the Extended Twin Family Design to Investigate the Genetic Basis of Political Beliefs” with Peter Hatemi, John Hibbing, Sarah Medland, Matthew Keller, Kevin Smith, Nicholas Martin, and Lindon Eaves, **American Journal of Political Science**, (July, 2010).

“The Ultimate Source of Political Opinions: Genes and the Environment” with John R. Hibbing in **Understanding Public Opinion**, 3rd Edition eds. Barbara Norrander and Clyde Wilcox, Washington D.C.: CQ Press, (2010).

“Is There a ‘Party’ in your Genes” with Peter Hatemi, John R. Hibbing, Nicholas Martin and Lindon Eaves, **Political Research Quarterly**, (September, 2009).

“Twin Studies, Molecular Genetics, Politics, and Tolerance: A Response to Beckwith and Morris” with John R. Hibbing and Cary Funk, **Perspectives on Politics**, (December, 2008). This is a solicited response to a critique of our 2005 APSR article “Are Political Orientations Genetically Transmitted?”

“Political Attitudes Vary with Physiological Traits” with Douglas R. Oxley, Kevin B. Smith, Matthew V. Hibbing, Jennifer L. Miller, Mario Scalora, Peter K. Hatemi, and John R. Hibbing, **Science**, (September 19, 2008).

“The New Empirical Biopolitics” with John R. Hibbing, **Annual Review of Political Science**, (June, 2008).

“Beyond Liberals and Conservatives to Political Genotypes and Phenotypes” with John R. Hibbing and Cary Funk, **Perspectives on Politics**, (June, 2008). This is a solicited response to a critique of our 2005 APSR article “Are Political Orientations Genetically Transmitted?”

"Personal, Interpersonal, and Political Temperaments" with John R. Hibbing, **Annals of the American Academy of Political and Social Science**, (November, 2007).

"Is Politics in our Genes?" with John R. Hibbing, **Tidsskriftet Politik**, (February, 2007).

"Biology and Rational Choice" with John R. Hibbing, **The Political Economist**, (Fall, 2005)

"Are Political Orientations Genetically Transmitted?" with John R. Hibbing and Carolyn Funk, **American Political Science Review**, (May, 2005). (The main findings table from this article has been reprinted in two college level text books - Psychology, 9th ed. and Invitation to Psychology 4th ed. both by Wade and Tavis, Prentice Hall, 2007).

"The Origin of Politics: An Evolutionary Theory of Political Behavior" with John R. Hibbing, **Perspectives on Politics**, (December, 2004).

"Accepting Authoritative Decisions: Humans as Wary Cooperators" with John R. Hibbing, **American Journal of Political Science**, (January, 2004).

"Electoral Convergence of the Two Houses of Congress" with John R. Hibbing, in **The Exceptional Senate**, ed. Bruce Oppenheimer, Columbus: Ohio State University Press, (2002).

"We're All in this Together: The Decline of Trust in Government, 1958-1996." in **What is it About Government that Americans Dislike?**, eds. John Hibbing and Beth Theiss-Morse, Cambridge: Cambridge University Press, (2001).

"The 2000 Census and the New Redistricting," **Texas State Bar Association School Law Section Newsletter**, (July, 2000).

"Overdraft: The Political Cost of Congressional Malfeasance" with Holly Teeters, Dan Ward, and Rick Wilson, **Journal of Politics** (August, 1994).

"Personal and Partisan Advantage in U.S. Congressional Elections, 1846-1990" with David W. Brady, in **Congress Reconsidered** 5th edition, eds. Larry Dodd and Bruce Oppenheimer, CQ Press, (1993).

"The 1990 Congressional Election Results and the Fallacy that They Embodied an Anti-Incumbent Mood" with John R. Hibbing, **PS** 25 (June, 1992).

"Constituency Population and Representation in the United States Senate" with John R. Hibbing. **Legislative Studies Quarterly**, (November, 1990).

"Editors' Introduction: Electing the U.S. Senate" with Bruce I. Oppenheimer. **Legislative Studies Quarterly**, (November, 1990).

"Personal and Partisan Advantage in U.S. Congressional Elections, 1846-1990" with David W. Brady, in **Congress Reconsidered** 4th edition, eds. Larry Dodd and Bruce Oppenheimer, CQ Press, (1988). Reprinted in *The Congress of the United States, 1789-1989*, ed. Joel Silby, Carlson Publishing Inc., (1991), and in *The Quest for Office*, eds. Wayne and Wilcox, St. Martins Press, (1991).

"Can Government Regulate Fertility? An Assessment of Pro-natalist Policy in Eastern Europe" with Jerome Legge. **The Western Political Quarterly** (December, 1986).

"Partisanship and Voting" with James Campbell, Mary Munro, and Bruce Campbell, in **Research in Micropolitics. Volume 1 - Voting Behavior**. Samuel Long, ed. JAI Press, (1986).

"Economic Conditions and Individual Vote in the Federal Republic of Germany" with Jerome S. Legge. **Journal of Politics** (November, 1984).

"Television Markets and Congressional Elections" with James Campbell and Keith Henry. **Legislative Studies Quarterly** (November, 1984).

"Economic Conditions and the Forgotten Side of Congress: A Foray into U.S. Senate Elections" with John R. Hibbing, **British Journal of Political Science** (October, 1982).

"Increased Incumbency Advantage in the House" with John R. Hibbing, **Journal of Politics** (November, 1981). Reprinted in *The Congress of the United States, 1789-1989*, Carlson Publishing Inc., (1991).

"The Electoral Impact of Economic Conditions: Who is Held Responsible?" with John R. Hibbing, **American Journal of Political Science** (August, 1981).

"Comment on Increased Incumbency Advantage" with John R. Hibbing, Refereed communication: **American Political Science Review** (March, 1981).

"Can Government Regulate Safety? The Coal Mine Example" with Michael Lewis-Beck, **American Political Science Review** (September, 1980).

Awards and Honors:

CQ Press Award - 1988, honoring the outstanding paper in legislative politics presented at the 1987 Annual Meeting of the American Political Science Association. Awarded for "The Demise of the Upper House and the Rise of the Senate: Electoral Responsiveness in the United States Senate" with John Hibbing.

Research Grants:

National Science Foundation, 2009-2011, "Identifying the Biological Influences on Political Temperaments", with John Hibbing, Kevin Smith, Kim Espy, Nicolas Martin and Read Montague. This is a collaborative project involving Rice, University of Nebraska, Baylor College of Medicine, and Queensland Institute for Medical Research.

National Science Foundation, 2007-2010, "Genes and Politics: Providing the Necessary Data", with John Hibbing, Kevin Smith, and Lindon Eaves. This is a collaborative project involving Rice, University of Nebraska, Virginia Commonwealth University, and the University of Minnesota.

National Science Foundation, 2007-2010, "Investigating the Genetic Basis of Economic Behavior", with John Hibbing and Kevin Smith. This is a collaborative project involving Rice, University of Nebraska, Virginia Commonwealth University, and the Queensland Institute of Medical Research.

Rice University Faculty Initiatives Fund, 2007-2009, “The Biological Substrates of Political Behavior”. This is in assistance of a collaborative project involving Rice, Baylor College of Medicine, Queensland Institute of Medical Research, University of Nebraska, Virginia Commonwealth University, and the University of Minnesota.

National Science Foundation, 2004-2006, “Decision-Making on Behalf of Others”, with John Hibbing. This is a collaborative project involving Rice and the University of Nebraska.

National Science Foundation, 2001-2002, dissertation grant for Kevin Arceneaux, "Doctoral Dissertation Research in Political Science: Voting Behavior in the Context of U.S. Federalism."

National Science Foundation, 2000-2001, dissertation grant for Stacy Ulbig, "Doctoral Dissertation Research in Political Science: Sub-national Contextual Influences on Political Trust."

National Science Foundation, 1999-2000, dissertation grant for Richard Engstrom, "Doctoral Dissertation Research in Political Science: Electoral District Structure and Political Behavior."

Rice University Research Grant, 1985, Recent Trends in British Parliamentary Elections.

Faculty Research Grants Program, University of Georgia, Summer, 1982. Impact of Media Structure on Congressional Elections, with James Campbell.

Papers Presented:

“The Physiological Basis of Political Temperaments” 6th European Consortium for Political Research General Conference, Reykjavik, Iceland (2011), with Kevin Smith, and John Hibbing.

“Identifying the Biological Influences on Political Temperaments” National Science Foundation Annual Human Social Dynamics Meeting (2010), with John Hibbing, Kimberly Espy, Nicholas Martin, Read Montague, and Kevin B. Smith.

“Political Orientations May Be Related to Detection of the Odor of Androstenone” Annual meeting of the Midwest Political Science Association, Chicago, IL (2010), with Kevin Smith, Amanda Balzer, Michael Gruszczynski, Carly M. Jacobs, and John Hibbing.

“Toward a Modern View of Political Man: Genetic and Environmental Transmission of Political Orientations from Attitude Intensity to Political Participation” Annual meeting of the American Political Science Association, Washington, DC (2010), with Carolyn Funk, Kevin Smith, and John Hibbing.

“Genetic and Environmental Transmission of Political Involvement from Attitude Intensity to Political Participation” Annual meeting of the International Society for Political Psychology, San Francisco, CA (2010), with Carolyn Funk, Kevin Smith, and John Hibbing.

“Are Violations of the EEA Relevant to Political Attitudes and Behaviors?” Annual meeting of the Midwest Political Science Association, Chicago, IL (2010), with Kevin Smith, and John Hibbing.

“The Neural Basis of Representation” Annual meeting of the American Political Science Association, Toronto, Canada (2009), with John Hibbing.

“Genetic and Environmental Transmission of Value Orientations” Annual meeting of the American Political Science Association, Toronto, Canada (2009), with Carolyn Funk, Kevin Smith, Matthew Hibbing, Pete Hatemi, Robert Krueger, Lindon Eaves, and John Hibbing.

“The Genetic Heritability of Political Orientations: A New Twin Study of Political Attitudes” Annual Meeting of the International Society for Political Psychology, Dublin, Ireland (2009), with John Hibbing, Cary Funk, Kevin Smith, and Peter K Hatemi.

“The Heritability of Value Orientations” Annual meeting of the Behavior Genetics Association, Minneapolis, MN (2009), with Kevin Smith, John Hibbing, Carolyn Funk, Robert Krueger, Peter Hatemi, and Lindon Eaves.

“The Ick Factor: Disgust Sensitivity as a Predictor of Political Attitudes” Annual meeting of the Midwest Political Science Association, Chicago, IL (2009), with Kevin Smith, Douglas Oxley Matthew Hibbing, and John Hibbing.

“The Ideological Animal: The Origins and Implications of Ideology” Annual meeting of the American Political Science Association, Boston, MA (2008), with Kevin Smith, Matthew Hibbing, Douglas Oxley, and John Hibbing.

“The Physiological Differences of Liberals and Conservatives” Annual meeting of the Midwest Political Science Association, Chicago, IL (2008), with Kevin Smith, Douglas Oxley, and John Hibbing.

“Looking for Political Genes: The Influence of Serotonin on Political and Social Values” Annual meeting of the Midwest Political Science Association, Chicago, IL (2008), with Peter Hatemi, Sarah Medland, John Hibbing, and Nicholas Martin.

“Not by Twins Alone: Using the Extended Twin Family Design to Investigate the Genetic Basis of Political Beliefs” Annual meeting of the American Political Science Association, Chicago, IL (2007), with Peter Hatemi, John Hibbing, Matthew Keller, Nicholas Martin, Sarah Medland, and Lindon Eaves.

“Factorial Association: A generalization of the Fulker between-within model to the multivariate case” Annual meeting of the Behavior Genetics Association, Amsterdam, The Netherlands (2007), with Sarah Medland, Peter Hatemi, John Hibbing, William Coventry, Nicholas Martin, and Michael Neale.

“Not by Twins Alone: Using the Extended Twin Family Design to Investigate the Genetic Basis of Political Beliefs” Annual meeting of the Midwest Political Science Association, Chicago, IL (2007), with Peter Hatemi, John Hibbing, Nicholas Martin, and Lindon Eaves.

“Getting from Genes to Politics: The Connecting Role of Emotion-Reading Capability” Annual Meeting of the International Society for Political Psychology, Portland, OR, (2007.), with John Hibbing.

“The Neurological Basis of Representative Democracy.” Hendricks Conference on Political Behavior, Lincoln, NE (2006), with John Hibbing.

“The Neural Basis of Representative Democracy” Annual meeting of the American Political Science Association, Philadelphia, PA (2006), with John Hibbing.

“How are Political Orientations Genetically Transmitted? A Research Agenda” Annual meeting of the Midwest Political Science Association, Chicago Illinois (2006), with John Hibbing.

"The Politics of Mate Choice" Annual meeting of the Southern Political Science Association, Atlanta, GA (2006), with John Hibbing.

"The Challenge Evolutionary Biology Poses for Rational Choice" Annual meeting of the American Political Science Association, Washington, DC (2005), with John Hibbing and Kevin Smith.

"Decision Making on Behalf of Others" Annual meeting of the American Political Science Association, Washington, DC (2005), with John Hibbing.

"The Source of Political Attitudes and Behavior: Assessing Genetic and Environmental Contributions" Annual meeting of the Midwest Political Science Association, Chicago Illinois (2005), with John Hibbing and Carolyn Funk.

"The Source of Political Attitudes and Behavior: Assessing Genetic and Environmental Contributions" Annual meeting of the American Political Science Association, Chicago Illinois (2004), with John Hibbing and Carolyn Funk.

"Accepting Authoritative Decisions: Humans as Wary Cooperators" Annual Meeting of the Midwest Political Science Association, Chicago, Illinois (2002), with John Hibbing

"Can We Trust the NES Trust Measure?" Annual Meeting of the Midwest Political Science Association, Chicago, Illinois (2001), with Stacy Ulbig.

"The Impact of Organizational Structure on the Production of Social Capital Among Group Members" Annual Meeting of the Southern Political Science Association, Atlanta, Georgia (2000), with Allison Rinden.

"Isolating the Origins of Incumbency Advantage: An Analysis of House Primaries, 1956-1998" Annual Meeting of the Southern Political Science Association, Atlanta, Georgia (2000), with Kevin Arceneaux.

"The Electorally Indistinct Senate," Norman Thomas Conference on Senate Exceptionalism, Vanderbilt University; Nashville, Tennessee; October (1999), with John R. Hibbing.

"Interest Group Participation and Social Capital" Annual Meeting of the Midwest Political Science Association, Chicago, Illinois (1999), with Allison Rinden.

"We're All in this Together: The Decline of Trust in Government, 1958-1996." The Hendricks Symposium, University of Nebraska, Lincoln. (1998)

"Constituency Population and Representation in the United States Senate," Electing the Senate; Houston, Texas; December (1989), with John R. Hibbing.

"The Disparate Electoral Security of House and Senate Incumbents," American Political Science Association Annual Meetings; Atlanta, Georgia; September (1989), with John R. Hibbing.

"Partisan and Incumbent Advantage in House Elections," Annual Meeting of the Southern Political Science Association (1987), with David W. Brady.

"Personal and Party Advantage in U.S. House Elections, 1846-1986" with David W. Brady, 1987 Social Science History Association Meetings.

"The Demise of the Upper House and the Rise of the Senate: Electoral Responsiveness in the United States Senate" with John Hibbing, 1987 Annual Meeting of the American Political Science Association.

"A Comparative Analysis of Economic Voting" with Jerome Legge, 1985 Annual Meeting of the American Political Science Association.

"An Analysis of Economic Conditions and the Individual Vote in Great Britain, 1964-1979" with Jerome Legge, 1985 Annual Meeting of the Western Political Science Association.

"Can Government Regulate Fertility? An Assessment of Pro-natalist Policy in Eastern Europe" with Jerome Legge, 1985 Annual Meeting of the Southwestern Social Science Association.

"Economic Conditions and the Individual Vote in the Federal Republic of Germany" with Jerome S. Legge, 1984 Annual Meeting of the Southern Political Science Association.

"The Conditions Required for Economic Issue Voting" with John R. Hibbing, 1984 Annual Meeting of the Midwest Political Science Association.

"Incumbency Advantage in Senate Elections," 1983 Annual Meeting of the Midwest Political Science Association.

"Television Markets and Congressional Elections: The Impact of Market/District Congruence" with James Campbell and Keith Henry, 1982 Annual Meeting of the Southern Political Science Association.

"Economic Conditions and Senate Elections" with John R. Hibbing, 1982 Annual Meeting of the Midwest Political Science Association. "Pocketbook Voting: Economic Conditions and Individual Level Voting," 1982 Annual Meeting of the American Political Science Association.

"Increased Incumbency Advantage in the House," with John R. Hibbing, 1981 Annual Meeting of the Midwest Political Science Association.

Other Conference Participation:

Roundtable Participant – Closing Round-table on Biopolitics; 2016 UC Merced Conference on Bio-Politics and Political Psychology, Merced, CA.

Roundtable Participant "Genes, Brains, and Core Political Orientations" 2008 Annual Meeting of the Southwestern Political Science Association, Las Vegas.

Roundtable Participant "Politics in the Laboratory" 2007 Annual Meeting of the Southern Political Science Association, New Orleans.

Short Course Lecturer, "What Neuroscience has to Offer Political Science" 2006 Annual Meeting of the American Political Science Association.

Panel chair and discussant, "Neuro-scientific Advances in the Study of Political Science" 2006 Annual Meeting of the American Political Science Association.

Presentation, "The Twin Study Approach to Assessing Genetic Influences on Political Behavior" Rice Conference on New Methods for Understanding Political Behavior, 2005.

Panel discussant, "The Political Consequences of Redistricting," 2002 Annual Meeting of the American Political Science Association.

Panel discussant, "Race and Redistricting," 1999 Annual Meeting of the Midwest Political Science Association.

Invited participant, "Roundtable on Public Dissatisfaction with American Political Institutions", 1998 Annual Meeting of the Southwestern Social Science Association.

Presentation, "Redistricting in the '90s," Texas Economic and Demographic Association, 1997.

Panel chair, "Congressional Elections," 1992 Annual Meeting of the Southern Political Science Association.

Panel discussant, "Incumbency and Congressional Elections," 1992 Annual Meeting of the American Political Science Association.

Panel chair, "Issues in Legislative Elections," 1991 Annual Meeting of the Midwest Political Science Association.

Panel chair, "Economic Attitudes and Public Policy in Europe," 1990 Annual Meeting of the Southern Political Science Association

Panel discussant, "Retrospective Voting in U.S. Elections," 1990 Annual Meeting of the Midwest Political Science Association.

Co-convener, with Bruce Oppenheimer, of Electing the Senate, a national conference on the NES 1988 Senate Election Study. Funded by the Rice Institute for Policy Analysis, the University of Houston Center for Public Policy, and the National Science Foundation, Houston, Texas, December, 1989.

Invited participant, Understanding Congress: A Bicentennial Research Conference, Washington, D.C., February, 1989.

Invited participant--Hendricks Symposium on the United States Senate, University of Nebraska, Lincoln, Nebraska, October, 1988

Invited participant--Conference on the History of Congress, Stanford University, Stanford, California, June, 1988.

Invited participant, "Roundtable on Partisan Realignment in the 1980's", 1987 Annual Meeting of the Southern Political Science Association.

Professional Activities:

Other Universities:

Invited Speaker, Annual Lecture, Psi Kappa -the Psychology Club at Houston Community College, 2018.

Invited Speaker, Annual Allman Family Lecture, Dedman College Interdisciplinary Institute, Southern Methodist University, 2016.

Invited Speaker, Annual Lecture, Psi Sigma Alpha – Political Science Dept., Oklahoma State University, 2015.

Invited Lecturer, Department of Political Science, Vanderbilt University, 2014.

Invited Speaker, Annual Lecture, Psi Kappa -the Psychology Club at Houston Community College, 2014.

Invited Speaker, Graduate Student Colloquium, Department of Political Science, University of New Mexico, 2013.

Invited Keynote Speaker, Political Science Alumni Evening, University of Houston, 2013.

Invited Lecturer, Biology and Politics Masters Seminar (John Geer and David Bader), Department of Political Science and Biology Department, Vanderbilt University, 2010.

Invited Lecturer, Biology and Politics Senior Seminar (John Geer and David Bader), Department of Political Science and Biology Department, Vanderbilt University, 2008.

Visiting Fellow, the Hoover Institution, Stanford University, 2007.

Invited Speaker, Joint Political Psychology Graduate Seminar, University of Minnesota, 2007.

Invited Speaker, Department of Political Science, Vanderbilt University, 2006.

Member:

Editorial Board, Journal of Politics, 2007-2008.

Planning Committee for the National Election Studies' Senate Election Study, 1990-92.

Nominations Committee, Social Science History Association, 1988

Reviewer for:

American Journal of Political Science

American Political Science Review

American Politics Research

American Politics Quarterly

American Psychologist

American Sociological Review

Canadian Journal of Political Science

Comparative Politics

Electoral Studies

Evolution and Human Behavior

International Studies Quarterly

Journal of Politics
Journal of Urban Affairs
Legislative Studies Quarterly
National Science Foundation
PLoS ONE
Policy Studies Review
Political Behavior
Political Communication
Political Psychology
Political Research Quarterly
Public Opinion Quarterly
Science
Security Studies
Social Forces
Social Science Quarterly
Western Political Quarterly

University Service:

Member, University Senate, 2021-2023.

Member, University Parking Committee, 2016-2022.

Member, University Benefits Committee, 2013-2016.

Internship Director for the Department of Political Science, 2004-2018.

Member, University Council, 2012-2013.

Invited Speaker, Rice Classroom Connect, 2016.

Invited Speaker, Glasscock School, 2016.

Invited Speaker, Rice Alumni Association, Austin, 2016.

Invited Speaker, Rice Alumni Association, New York City, 2016.

Invited Speaker, Rice TEDxRiceU , 2013.

Invited Speaker, Rice Alumni Association, Atlanta, 2011.

Lecturer, Advanced Topics in AP Psychology, Rice University AP Summer Institute, 2009.

Scientia Lecture Series: "Politics in Our Genes: The Biology of Ideology" 2008

Invited Speaker, Rice Alumni Association, Seattle, San Francisco and Los Angeles, 2008.

Invited Speaker, Rice Alumni Association, Austin, Chicago and Washington, DC, 2006.

Invited Speaker, Rice Alumni Association, Dallas and New York, 2005.

Director: Rice University Behavioral Research Lab and Social Science Computing Lab, 2005-2006.

University Official Representative to the Inter-university Consortium for Political and Social Research, 1989-2012.

Director: Rice University Social Science Computing Lab, 1989-2004.

Member, Rice University Information Technology Access and Security Committee, 2001-2002

Rice University Committee on Computers, Member, 1988-1992, 1995-1996; Chair, 1996-1998, Co-chair, 1999.

Acting Chairman, Rice Institute for Policy Analysis, 1991-1992.

Divisional Member of the John W. Gardner Dissertation Award Selection Committee, 1998

Social Science Representative to the Educational Sub-committee of the Computer Planning Committee, 1989-1990.

Director of Graduate Admissions, Department of Political Science, Rice University, 1986-1988.

Co-director, Mellon Workshop: Southern Politics, May, 1988.

Guest Lecturer, Mellon Workshop: The U.S. Congress in Historical Perspective, May, 1987 and 1988.

Faculty Associate, Hanszen College, Rice University, 1987-1990.

Director, Political Data Analysis Center, University of Georgia, 1982-1985.

External Consulting:

Expert Witness, Soto Palmer v. Hobbs, (Washington State), racially polarized voting analysis, 2022.

Expert Witness, Pendergrass v. Raffensperger, (Georgia State House and Senate), racially polarized voting analysis, 2022.

Expert Witness, LULAC, et al. v. Abbott, et al., Voto Latino, et al. v. Scott, et al., Mexican American Legislative Caucus, et al. v. Texas, et al., Texas NAACP v. Abbott, et al., Fair Maps Texas, et al. v. Abbott, et al., US v. Texas, et al. (consolidated cases) challenges to Texas Congressional, State Senate, State House, and State Board of Education districting, 2022.

Expert Witness, Robinson/Galmon v. Ardoyn, (Louisiana), racially polarized voting analysis, 2022.

Expert Witness, Christian Ministerial Alliance et al v. Arkansas, racially polarized voting analysis, 2022.

Expert Witness, Johnson v. Wisconsin Elections Commission, 2022.

Expert Witness, Rivera, et al. v. Schwab, Alonzo, et al. v. Schwab, Frick, et al. v. Schwab, (consolidated cases) challenge to Kansas congressional map, 2022.

Expert Witness, Grant v. Raffensperger, challenge to Georgia congressional map, 2022

Expert Witness, Brooks et al. v. Abbot, challenge to State Senate District 10, 2022.

Expert Witness, Elizondo v. Spring Branch ISD, 2022.

Expert Witness, Portugal v. Franklin County, et al., challenge to Franklin County, Washington at large County Commissioner's election system, 2022.

Consulting Expert, Gressman Math/Science Petitioners, Pennsylvania Congressional redistricting, 2022.

Consultant, Houston Community College – evaluation of election impact for redrawing of college board election districts, 2022.

Consultant, Lone Star College – evaluation of election impact for redrawing of college board election districts, 2022.

Consultant, Killeen ISD – evaluation of election impact for redrawing of school board election districts, 2022.

Consultant, Houston ISD – evaluation of election impact for redrawing of school board election districts, 2022.

Consultant, Brazosport ISD – evaluation of election impact for redrawing of school board election districts, 2022.

Consultant, Dallas ISD – evaluation of election impact for redrawing of school board election districts, 2022.

Consultant, Lancaster ISD – redrawing of all school board member election districts including demographic analysis and redrawing of election districts, 2021.

Consultant, City of Baytown – redrawing of all city council member election districts including demographic analysis and redrawing of election districts, 2021.

Consultant, Goose Creek ISD – redrawing of all board member election districts including demographic analysis and redrawing of election districts, 2021.

Expert Witness, Bruni et al. v. State of Texas, straight ticket voting analysis, 2020.

Consulting Expert, Sarasota County, VRA challenge to district map, 2020.

Expert Witness, Kumar v. Frisco ISD, TX, racially polarized voting analysis, 2019.

Expert Witness, Vaughan v. Lewisville ISD, TX, racially polarized voting analysis, 2019.

Expert Witness, Johnson v. Ardoyn, (Louisiana), racially polarized voting analysis, 2019.

Expert Witness, Flores et al. v. Town of Islip, NY, racially polarized voting analysis, 2018.

Expert Witness, Tyson v. Richardson ISD, racially polarized voting analysis, 2018.

Expert Witness, Dwight v. State of Georgia, racially polarized voting analysis, 2018.

Expert Witness, NAACP v. East Ramapo Central School District, racially polarized voting analysis, 2018.

Expert Witness, Georgia NAACP v. State of Georgia, racially polarized voting analysis, 2018.

EXHIBIT 8

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

-----x
COAKLEY PENDERGRASS, et al., :
: :
Plaintiffs, : Civil Action
vs. : File No.
: :
BRAD RAFFENSPERGER, in his : 1:21-cv-05339-SCJ
official capacity as the :
Georgia Secretary of State, :
et al., :
Defendants. :
-----x

ANNIE LOIS GRANT, et al., :
: :
Plaintiffs, : Civil Action
vs. : File No.
: :
BRAD RAFFENSPERGER, in his : 1:22-cv-00122-SCJ
official capacity as the :
Georgia Secretary of State, :
et al., :
Defendants. :
-----X

VIRTUAL REMOTE VIDEOTAPED DEPOSITION OF
JOHN B. MORGAN

Monday, February 13, 2023
10:34 a.m. Eastern Standard Time

REPORTER: Dawn A. Jaques, CSR, CLR

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

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1 A I think so. And again, the
2 comparison I was making in my report is that
3 Douglas County was unsplit in the 1205 Plan,
4 but it introduced -- the 1205 Plan introduced
5 a new split of Cobb County.

6 Q Got it. Do you dispute that
7 Mr. Cooper's 1205 Illustrative Plan puts the
8 same number of counties as the Enacted Plan?

9 A It appears to be that, yes.

10 Q Do you have any reason to dispute
11 that?

12 A No. It says 15 and 15. I believe
13 that's correct.

14 Q And do you dispute that Mr. Cooper's
15 1205 Illustrative Plan has fewer individual
16 county splits than the Enacted Plan?

17 A That's what his chart shows.

18 Q And do you have any reason to
19 dispute that?

20 A I haven't looked at it in that way,
21 so I don't have any reason to dispute it one
22 way or another.

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1 Q You provided no analysis of that in
2 your report?

3 A No, but I believe that in the
4 Plan Component Report, that information is
5 available.

6 Q And you did not notice or observe
7 whether that was incorrect?

8 A I didn't notice or observe anything
9 about that.

10 Q You did not check Mr. Cooper's
11 assessments of county splits when you were
12 performing your own analysis?

13 A Not directly, no. I ran the reports
14 based on the block assignment files provided.

15 Q Do you have any reason to dispute
16 that Mr. Cooper's 1205 Illustrative Plan
17 splits fewer cities and towns than the
18 Enacted Plan?

19 A That's what it reports in this
20 chart.

21 Q Do you have any reason to dispute
22 that?

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1 A Again, I didn't look at the second
2 column in detail, but I don't have any reason
3 to dispute it.

4 Q And do you have any reason to
5 dispute that Mr. Cooper's Illustrative Plan
6 has fewer individual city and town splits than
7 the Enacted Plan?

8 A That's what it shows in the chart.

9 Q Do you have any reason to dispute
10 that?

11 A No.

12 Q Do you have any reason to dispute
13 that Mr. Cooper's Illustrative Plan splits
14 fewer VTDs than the Enacted Plan?

15 A It appears that's what's in the
16 chart. I believe that's correct.

17 Q Okay, we can take down Mr. Cooper's
18 report. I don't think I'll be referring to it
19 for a little while.

20 Turning back to your report, which
21 is Exhibit 1 to this deposition, let's look at
22 paragraph 17, and here you're also comparing

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1 Q So the actual analysis and opinion
2 that you're explaining to me right now, that's
3 not included anywhere in your report; is that
4 correct?

5 A It's included in paragraph 17
6 because I said that's my opinion.

7 Q So in paragraph 17, you state that
8 care was taken; is that correct?

9 A Yes.

10 Q But the idea of taking the northerly
11 versus the southerly portion, that's not
12 anywhere in your analysis, correct?

13 A I'm stating it in that paragraph.
14 I'm stating it now as well.

15 Q So in your report, you provide no
16 opinion as to the changes between the PI Plan
17 in Cobb County and the 1205 Plan in Cobb and
18 Douglas County other than that care was taken;
19 is that correct?

20 A I also point out that there was a
21 change in the splits, which we discussed in
22 paragraph 16.

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1 Q Okay. So the sum total of your
2 opinions regarding those changes are in
3 paragraphs 16 and 17 of your report, correct?

4 A I believe so.

5 Q All right. Okay, let's turn to
6 paragraph 19 of your report. I believe
7 paragraphs 19 and 20 are where you analyze the
8 split geography for the reports that you ran;
9 is that right?

10 A Yes, it looks that way.

11 Q In your experience, is preservation
12 of county boundaries considered a traditional
13 districting principle?

14 A Generally, yes.

15 Q What about avoiding precinct splits,
16 is that a traditional districting principle?

17 A In many cases, that is included in
18 traditional redirecting principles.

19 Q Do you believe it to be a
20 traditional directing principle in Georgia
21 based on your experience?

22 A Yes. My experience is specifically

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1 in Georgia, when I did this 20 years ago, in
2 many instances where there was a choice
3 between keeping a place or municipality --
4 city, if you will -- whole, or a voting
5 precinct, in many cases, the voting precinct
6 was kept whole above the city.

7 Q Okay. And you agree that
8 Mr. Cooper's 1205 Illustrative Plan splits the
9 same number of counties as the Enacted
10 Congressional Plan; is that correct?

11 A Yes.

12 Q You say as much in paragraph 20 of
13 your report.

14 A Yes. And I talked about Douglas
15 County; I believe that is what brings it into
16 agreement with the Enacted Plan in terms of
17 number of county splits.

18 Q And we also discussed how the actual
19 number of individual county splits is in fact
20 smaller in Mr. Cooper's Illustrative Plan than
21 in the Enacted Plan; is that correct?

22 A Yes, I believe that's the case.

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1 Q And you would agree that
2 Mr. Cooper's 1205 Illustrative Plan splits
3 fewer voting precincts than the Enacted Map;
4 is that correct?

5 A I believe the analysis shows that,
6 yes.

7 Q Great. And how many voting
8 precincts are there in Georgia, if you recall?

9 A About 2600.

10 Q In paragraphs 21 and 22, I believe
11 that's where you discuss the compactness
12 analysis that you ran; is that right?

13 A Yes.

14 Q In your experience, is compactness
15 considered to be a traditional redistricting
16 principle in Georgia?

17 A In my experience, yes.

18 Q And here you conclude that
19 Mr. Cooper's 1205 Illustrative Congressional
20 Plan has similar mean compactness scores to
21 the Enacted Plan. Did I read that correctly?

22 A Yes.

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1 Q And you report those mean
2 compactness scores at the bottom of chart 2,
3 which spills over onto the next page?

4 A Yes.

5 Q And there we can get Mr. Cooper's
6 1205 Plan has a mean Polsby-Popper score that
7 is identical to the Enacted Plan; is that
8 correct?

9 A Yes, using two decimal points.

10 Q And Mr. Cooper's 1205 Plan has a
11 mean Reock score that is actually higher than
12 that of the Enacted Plan; is that correct?

13 A I'm sorry, could you repeat that,
14 please?

15 Q Sure. Based on your chart, Chart 2,
16 Mr. Cooper's 1205 Plan has a mean Reock score
17 that is higher than that of the Enacted Plan?

18 A That's not what the chart shows.

19 Q Oh, sorry, that was the other way
20 around.

21 The Enacted Reock mean is .01 higher
22 than the Illustrative Plan; is that correct?

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1 A That's what the chart shows.

2 Q And you considered that .01
3 difference to mean that the two mean Reock
4 scores are similar, correct?

5 A Yes, they're very close.

6 Q In Chart 2, you also provide the
7 compactness scores of the individual districts
8 in Mr. Cooper's Illustrative Plan versus the
9 Enacted Plan; is that right?

10 A Yes.

11 Q And are you aware of which district
12 reflects the new majority-Black district in
13 Mr. Cooper's Illustrative Plan?

14 A I believe it's District 6.

15 Q According to your report,
16 Mr. Cooper's Illustrative District 6 is more
17 compact on the Reock Scale than Enacted
18 District 6?

19 A Yes.

20 Q And that difference is .03; is that
21 correct?

22 A Yes.

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1 Q Do you consider Illustrative
2 District 6 and Enacted District 6 to be
3 similar in terms of their Reock compactness
4 scores?

5 A Mr. Cooper's 1205 Plan is higher
6 than the Enacted Plan.

7 Q When you were discussing the mean
8 Reock scores, you opined that a .01 difference
9 was similar between the Enacted Plan; is that
10 correct?

11 A That's what I said in that
12 paragraph, yes.

13 Q Do you believe that the .03
14 difference in District 6 is similar between
15 the two plans?

16 A I said that the Cooper 1205 Plan is
17 higher than. It's .03 higher.

18 Q And do you believe that that .03 is
19 a significant difference, or renders the two
20 districts similar on the Reock compactness
21 measure?

22 A I didn't observe in the report that

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1 they were similar.

2 Q Do you have any opinion as to
3 whether they are similar?

4 A There's a difference of .03. I
5 would say that they're close, but not --
6 they're not as close as the mean scores are.

7 Q According to your report,
8 Mr. Cooper's Illustrative District 6 is also
9 more compact on the Polsby-Popper Scale than
10 the Enacted District 6; is that correct?

11 A Yes.

12 Q That difference is .07?

13 A Yes.

14 Q Do you have any opinion as to
15 whether that .07 difference is similar between
16 the two plans?

17 A It's higher in the Cooper 1205 Plan
18 than it is in the Enacted by .07.

19 Q And do you have any reason -- or did
20 you have any opinion as to whether .07 is a
21 similar difference between the two?

22 A It differs by .07. It's a greater

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1 difference than the .03 in the Reock and the
2 .01 in the mean scores.

3 Q So when you described the .01
4 difference as "similar," what is the highest
5 difference between two Reock scores or
6 Polsby-Popper scores that you would consider
7 to be similar?

8 A I hadn't really considered that. In
9 the report, I observed that in the mean it's
10 .01 difference, and in my report, I said that
11 was similar.

12 Q Okay.

13 A If we don't have a pending question,
14 I'd like to take a break?

15 Q Sure.

16 A Okay.

17 THE VIDEOGRAPHER: The time is
18 11:28 a.m. Off the record.

19 (A break was taken.)

20 THE VIDEOGRAPHER: The time is
21 11:36 a.m. Back on the record.

22 BY MS. KHANNA:

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1 +1/-1. I've seen other examples where it's
2 going to be zero and 1, not +1/-1, for a
3 congressional plan.

4 Q Do you dispute that Mr. Cooper's
5 plan achieves population equality?

6 A I don't have any basis to dispute
7 that. It's plus one person, minus one person.

8 I'm pointing out, however, that
9 other circumstances I've seen have a zero and
10 1 and not a -1/+1.

11 Q You also don't examine contiguity in
12 Mr. Cooper's Illustrative Plan; is that right?

13 A I didn't run any reports on that.

14 Q Do you dispute that Mr. Cooper's
15 Illustrative Plan -- illustrative districts
16 are contiguous?

17 A No, I didn't look at that.

18 Q Your analysis in the Pendergrass
19 report does not examine the extent to which
20 Mr. Cooper's Illustrative Plan respects
21 communities of interest; is that right?

22 A I don't think I address that

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1 you might have that in front of you.

2 A I do.

3 Q That's Exhibit 2 to this deposition,
4 paragraph 34 -- sorry, page 34, paragraph 86.

5 Do you see where I am?

6 A Paragraph what number, please?

7 Q Paragraph 86, the CONCLUSION
8 paragraph.

9 A Okay.

10 Q And here Mr. Cooper concludes, "The
11 Black population in Metro Atlanta is
12 sufficiently numerous and geographically
13 compact to allow for the creation of an
14 additional majority-Black congressional
15 district consistent with traditional
16 districting principles, anchored in Cobb,
17 Fulton and Douglas Counties, without reducing
18 the number of majority-Black districts in the
19 2021 Plan."

20 Do you see that?

21 A Yes.

22 Q Do you dispute any part of this

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1 conclusion?

2 A I didn't analyze that in my report.

3 Q So nothing in your report disputes
4 any portion of this conclusion?

5 A It appears to be his opinion.

6 Q I understand that's his opinion. Do
7 you dispute the accuracy of his conclusion
8 there?

9 A I didn't analyze that in my report.

10 Q So your report offers no dispute of
11 Mr. Cooper's conclusion in paragraph 86 of his
12 report?

13 A It neither supports nor refutes it.

14 Q All right, I think we can put
15 Pendergrass to the side, and I'll now turn to
16 your Grant report from January 23rd, 2023, and
17 I believe we've premarked that as Exhibit 3 to
18 this deposition.

19 MR. TYSON: He has a paper copy in
20 front of him.

21 BY MS. KHANNA:

22 Q Let me pull it up myself.

EXHIBIT 9

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Coakley Pendergrass, et. al., v. Brad Raffensperger, et. al.

Dr. John Alford

Page 1

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

COAKLEY PENDERGRASS, et al.,

Plaintiffs,

vs.

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

Defendants.

Civil Action No.

2:21-CV-05449-SCJ

ANNIE LOIS GRANT, et al.,

Plaintiffs,

vs.

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

Defendants.

Civil Action No.

1:22-CV-00122-SCJ

Videotaped deposition of DR. JOHN ALFORD, taken
remotely in the above-captioned cause, before
Rachel F. Gard, CSR, RPR, CRR, commencing at
the hour of 11:00 a.m. Eastern on Thursday,
February 23, 2023.

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

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Dr. John Alford

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1 pretty much confined to that one Republican
2 primary.

3 Q Okay. Thank you. Switching gears a
4 little bit here, again you sort of hinted at this
5 earlier, would you consider Dr. Palmer to be an
6 expert in ecological inference analysis?

7 A Yes, I would.

8 Q And if I use the abbreviation "EI," I take
9 it you'll know that means ecological inference?

10 A Correct.

11 Q Okay. You'd agree that EI is the best
12 available method for estimating voting behavior by
13 race?

14 A Yes.

15 Q Do you have any disagreement with
16 Dr. Palmer's EI methodology or the quantitative
17 results he reported?

18 A I don't. And I'll just qualify. I think
19 it's the best available method for understanding
20 vote by race in the context of these kind of cases
21 where we're not doing surveys. There are a lot of
22 other ways that you might analyze this as a

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1 research task.

2 But in terms of dealing with providing
3 information from elections using precinct-level
4 data, this is clearly the right method. And
5 Dr. Palmer, I will say, had various -- in other
6 cases and in this case, reviewed both how he does
7 it and what were the results that he gets. I
8 think he's one of the experts I'd say is clearly
9 using the right technique and using it correctly.

10 Q And those conclusions extend to his work
11 in this case; yes?

12 A Yes.

13 Q Do you agree with Dr. Palmer's conclusion
14 that black Georgians are politically cohesive?

15 A Yes.

16 Q Do you agree that in the areas of Georgia
17 Dr. Palmer examined, white Georgia voters vote as
18 a bloc usually to defeat black preferred
19 candidates?

20 A There are a lot of areas in these reports.
21 And I know so the black cohesion doesn't vary very
22 much across the areas. It's always there. It's

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1 always present. But there are some subareas, and
2 I don't honestly recall if it's Dr. Palmer's
3 report or maybe in one of the areas of
4 Dr. Handley's report.

5 But if you get to a small enough area, you
6 get to an area where white voters are also voting,
7 not as cohesively, but also voting a majority
8 Democratic. So there are areas in Georgia where
9 the white vote is not cohesively to the preference
10 of black voters. But by and large across, these
11 areas, white voters are voting either cohesively
12 or at least in the majority for Republican
13 candidates.

14 Q Okay. Perhaps to put it more in the
15 parlance of Section 2, do you disagree with
16 Dr. Palmer's conclusions related to the third
17 Gingles precondition in this case?

18 A Yes.

19 MR. JACOUTOT: Object to form.

20 Q I'm sorry. So you do dispute his
21 conclusion that white voters generally vote as a
22 bloc to defeat black preferred candidates?

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Dr. John Alford

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1 A Well, so I just want to be precise about
2 what it is I agree and disagree with.

3 Q Absolutely.

4 A I don't disagree with his conclusion that
5 white voters are generally voting in a different
6 direction, excuse me, than black voters. In
7 particular contexts, obviously, that could
8 potentially act to bloc minority vote. But,
9 again, I'm not sure I agree. I think he -- his
10 view is that's really all he's trying to
11 establish, although he concludes something a
12 little broader than that. So I don't agree with
13 the broader conclusion.

14 And I'd say I'm agnostic about whether
15 that is or is not important at the 2 and 3 stage.
16 So certainly we don't agree about the totality of
17 the circumstances part. And I'm pretty agnostic
18 about whether -- what you're summarizing is kind
19 of a Gingles 2 and 3 as independent of racially
20 polarized voting.

21 Q Right.

22 A I'm not sure. The Court sometimes acts as

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Dr. John Alford

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1 Dr. Alford, second paragraph on page 3, and this
2 just a brief quotation, you wrote the quote: As
3 evident in Dr. Palmer's tables 1 through 6 in his
4 Pendergrass report and tables 2 through 6 in his
5 Grant report, the pattern of polarization is quite
6 striking. That's correct?

7 A Yes.

8 Q And that pattern of polarization you
9 referred to is the pattern observed between black
10 voters and white voters, correct?

11 A Correct.

12 Q And your basis for this agreement is that
13 black voters and white votes overwhelmingly
14 support different candidates in elections
15 Dr. Palmer looked at, correct?

16 A That's correct.

17 Q And this pattern can be seen in each one
18 of those elections regardless of the office, the
19 particular office at issue, correct?

20 A That's correct.

21 Q So is it fair to say that you have no
22 disagreement with Dr. Palmer about the voting

2/23/2023

Coakley Pendergrass, et. al., v. Brad Raffensperger, et. al.

Dr. John Alford

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1 patterns of the two, these two racial groups in
2 Georgia?

3 A So gain, he's confining his analysis to
4 general elections. And in general elections, I
5 don't have any disagreement with Dr. Palmer's
6 finding or his characterization. Specifically of
7 those findings, I think maybe he didn't even
8 characterize them as strongly as I'm
9 characterizing them and reflecting on his results.
10 This is clearly polarized voting, and the
11 stability of it across time and across office and
12 across geography is really pretty remarkable.

13 Q Okay. So now let's kind of drill down to
14 the disagreement that you alluded to earlier. Is
15 it fair to say, do you think, that your
16 disagreement with Dr. Palmer is on the legal
17 significance of these underlying facts and whether
18 they amount to racially polarized voting?

19 MR. JACOUTOT: Object to form.

20 A My own view is it's more fundamental than
21 that, although in the end it becomes a part of the
22 evidence base from what will be a legal finding.

2/23/2023

Coakley Pendergrass, et. al., v. Brad Raffensperger, et. al.

Dr. John Alford

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1 wasn't hired by the attorneys to do the
2 plaintiffs' work for them. I'm open, I'm
3 perfectly open to the possibility that there's a
4 very interesting story there, and I'm more than
5 happy to examine evidence that's provided for it
6 and see whether I think it's reliable and
7 appropriate and to comment on it.

8 But at this point, my job is just to
9 comment on the evidence that's been provided and
10 the evidence that's been provided just only shows
11 us the two things I've said and it leaves the rest
12 to be speculation.

13 And again, if -- you know, if the judge
14 thinks the law doesn't require anything other than
15 that the two groups vote differently without any
16 connection to race or even in spite of the fact
17 that the evidence shows no connection to race,
18 then that's the law. I'm fine with that. Again,
19 that's just not my -- that's no more my job than
20 it's my job to prove the unlikely connection that
21 you're suggesting.

22 You know, there's just one of me and there

EXHIBIT 10

2021 Committee Guidelines

I. HEARINGS AND MEETINGS

A. PUBLIC HEARINGS

1. A series of public hearings were held to actively seek public participation and input concerning the General Assembly's redrawing of congressional and legislative districts.
2. Video recordings of all hearings are and shall remain available on the legislative website, www.legis.ga.gov

B. COMMITTEE MEETINGS

1. All formal meetings of the full committee will be open to the public.
2. When the General Assembly is not in session, notices of all such meetings will be posted at the Offices of the Clerk of the House or Secretary of the Senate and other appropriate places at least 24 hours in advance of any meeting. Individual notices may be transmitted by email to any citizen or organization requesting the same without charge. Persons or organizations needing this information should contact the Senate Press Office or House Communications Office or the Secretary of the Senate or Clerk of the House to be placed on the notification list.
3. Minutes of all such meetings shall be kept and maintained in accordance with the rules of the House and Senate. Copies of the minutes should be made available in a timely manner at a reasonable cost in accordance with these same rules.

II. PUBLIC ACCESS TO REDISTRICTING DATA AND MATERIALS

- A. Census information databases on any medium created at public expense and held by the Committee or by the Legislative and Congressional Reapportionment Office for use in the redistricting process are included as public records and copies can be made available to the public in accordance with the rules of the General Assembly and subject to reasonable charges for search, retrieval, reproduction and other reasonable, related costs.
- B. Copies of the public records described above may be obtained at the cost of reproduction by members of the public on electronic media if the material exists on an appropriate electronic medium. Cost of reproduction may include not only the medium on which the copies made, but also the labor cost for the search, retrieval, and reproduction of the records and other reasonable, related costs.

- C. These guidelines regarding public access to redistricting data and materials do not apply to plans or other related materials prepared by or on behalf of an individual Member of the General Assembly using the Legislative and Congressional Reapportionment Office, where those plans and materials have not been made public through presentation to the Committee.

III. REDISTRICTING PLANS

A. GENERAL PRINCIPLES FOR DRAFTING PLANS

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
 - a. The boundaries of counties and precincts;
 - b. Compactness; and
 - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

B. PLANS PRODUCED THROUGH THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. Staff of the Legislative and Congressional Reapportionment Office will be available to all members of the General Assembly requesting assistance in accordance with the policy of that office.
2. Census data and redistricting work maps will be available to all members of the General Assembly upon request, provided that (a) the map was created by the requesting member, (b) the map is publicly available, or (c) the Legislative and Congressional Reapportionment Office has been granted permission by the author of the map to share a copy with the requesting member.
3. As noted above, redistricting plans and other records related to the provision of staff services to individual members of the General Assembly will not be subject to public disclosure. Only the author of a particular map may waive the confidentiality of his or her own work product. This confidentiality provision will not apply with respect to records related to the provision of staff services to any committee or subcommittee as a whole or to any records which are or have been previously disclosed by or pursuant to the direction of an individual member of the General Assembly.

C. PLANS PRODUCED OUTSIDE OF THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. All plans submitted to the Committee will be made part of the public record and made available in the same manner as other committee public records.
2. All plans prepared outside the Legislative and Congressional Reapportionment Office must be submitted to that office prior to presentation to the Committee by a Member of the General Assembly for technical verification and presentation and bill preparation. All pieces of census geography must be accounted for in some district.
3. The electronic submission of material for technical verification must be made in accordance with the following requirements or in a manner specifically approved and accepted by the Legislative and Congressional Reapportionment Office.
 - a. The submission shall be in electronic format with accompanying documentation that shows the submitting sponsor of the proposed plan and contact person for the proposed plan, including email address and telephone number.

- b. An electronic map image that clearly depicts defined boundaries, utilizing the 2020 United States Census geographic boundaries, and a block equivalency file containing two columns. The first column shall list the 15-digit census block identification numbers, and the second column shall list the three-digit district identification number. Both block and district numbers shall be zero-filled text files. Such files shall be submitted in .xis, .xlsx, .dbf, .txt, or .csv file formats. The following is a sample:

```
BlockID, DISTRICT
"13001950100101","008"
"13001950100102","008"
"13001950100103","008"
"13001950100104","008"
"13001950100105","008"
"13001950100106","008"
```

- 4. If submission of the plan cannot be done electronically, the following requirements must be followed:
 - a. All drafts, amendments, or revisions should be on clearly-depicted maps that follow the 2020 Census geographic boundaries and should be accompanied by a statistical sheet listing the Census geography including the total population for each district.
 - b. All plans submitted should either be a complete statewide plan or fit back into the plan that they modified, so that the proposal can be evaluated in the context of a statewide plan. All pieces of Census geography must be accounted for in some district.

D. GENERAL GUIDELINES FOR PRESENTATION OF ALL PLANS

- 1. A redistricting plan may be presented for consideration by the Committee only through the sponsorship of one or more Member(s) of the General Assembly. All such drafts of and amendments or revisions to plans presented at any committee meeting must be on clearly-depicted maps which follow the 2020 Census geographic boundaries and accompanied by a statistical sheet listing the Census geography, including the total population and minority populations for each proposed district.
- 2. No plan may be presented to the Committee unless that plan makes accommodations for and fits back into a specific, identified statewide map for the particular legislative body involved.

3. All plans presented at committee meetings will be made available for inspection by the public either electronically or by hard copy available at the Office of Legislative and Congressional Reapportionment.
- E. These guidelines may be reconsidered or amended by the Committee.

EXHIBIT 11

2021-2022 GUIDELINES FOR THE HOUSE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT COMMITTEE

I. HEARINGS AND MEETINGS

A. PUBLIC HEARINGS

1. A series of public hearings were held to actively seek public participation and input concerning the General Assembly's redrawing of congressional and legislative districts.
2. Video recordings of all hearings are and shall remain available on the legislative website, www.legis.ga.gov

B. COMMITTEE MEETINGS

1. All formal meetings of the full committee will be open to the public.
2. When the General Assembly is not in session, notices of all such meetings will be posted at the Offices of the Clerk of the House or Secretary of the Senate and other appropriate places at least 24 hours in advance of any meeting. Individual notices may be transmitted by email to any citizen or organization requesting the same without charge. Persons or organizations needing this information should contact the Senate Press Office or House Communications Office or the Secretary of the Senate or Clerk of the House to be placed on the notification list.
3. Minutes of all such meetings shall be kept and maintained in accordance with the rules of the House and Senate. Copies of the minutes should be made available in a timely manner at a reasonable cost in accordance with these same rules.

II. PUBLIC ACCESS TO REDISTRICTING DATA AND MATERIALS

- A. Census information databases on any medium created at public expense and held by the Committee or by the Legislative and Congressional Reapportionment Office for use in the redistricting process are included as public records and copies can be made available to the public in accordance with the rules of the General Assembly and subject to reasonable charges for search, retrieval, reproduction and other reasonable, related costs.
- B. Copies of the public records described above may be obtained at the cost of reproduction by members of the public on electronic media if the material exists on an appropriate electronic medium. Cost of reproduction may include not only the medium on which the copies made, but also the labor cost for the search, retrieval, and reproduction of the records and other reasonable, related costs.

- C. These guidelines regarding public access to redistricting data and materials do not apply to plans or other related materials prepared by or on behalf of an individual Member of the General Assembly using the Legislative and Congressional Reapportionment Office, where those plans and materials have not been made public through presentation to the Committee.

III. REDISTRICTING PLANS

A. GENERAL PRINCIPLES FOR DRAFTING PLANS

1. Each congressional district should be drawn with a total population of plus or minus one person from the ideal district size.
2. Each legislative district of the General Assembly should be drawn to achieve a total population that is substantially equal as practicable, considering the principles listed below.
3. All plans adopted by the Committee will comply with Section 2 of the Voting Rights Act of 1965, as amended.
4. All plans adopted by the Committee will comply with the United States and Georgia Constitutions.
5. Districts shall be composed of contiguous geography. Districts that connect on a single point are not contiguous.
6. No multi-member districts shall be drawn on any legislative redistricting plan.
7. The Committee should consider:
 - a. The boundaries of counties and precincts;
 - b. Compactness; and
 - c. Communities of interest.
8. Efforts should be made to avoid the unnecessary pairing of incumbents.
9. The identifying of these criteria is not intended to limit the consideration of any other principles or factors that the Committee deems appropriate.

B. PLANS PRODUCED THROUGH THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. Staff of the Legislative and Congressional Reapportionment Office will be available to all members of the General Assembly requesting assistance in accordance with the policy of that office.
2. Census data and redistricting work maps will be available to all members of the General Assembly upon request, provided that (a) the map was created by the requesting member, (b) the map is publicly available, or (c) the Legislative and Congressional Reapportionment Office has been granted permission by the author of the map to share a copy with the requesting member.
3. As noted above, redistricting plans and other records related to the provision of staff services to individual members of the General Assembly will not be subject to public disclosure. Only the author of a particular map may waive the confidentiality of his or her own work product. This confidentiality provision will not apply with respect to records related to the provision of staff services to any committee or subcommittee as a whole or to any records which are or have been previously disclosed by or pursuant to the direction of an individual member of the General Assembly.

C. PLANS PRODUCED OUTSIDE OF THE LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE

1. All plans submitted to the Committee will be made part of the public record and made available in the same manner as other committee public records.
2. All plans prepared outside the Legislative and Congressional Reapportionment Office must be submitted to that office prior to presentation to the Committee by a Member of the General Assembly for technical verification and presentation and bill preparation. All pieces of census geography must be accounted for in some district.
3. The electronic submission of material for technical verification must be made in accordance with the following requirements or in a manner specifically approved and accepted by the Legislative and Congressional Reapportionment Office.
 - a. The submission shall be in electronic format with accompanying documentation that shows the submitting sponsor of the proposed plan and contact person for the proposed plan, including email address and telephone number.
 - b. An electronic map image that clearly depicts defined boundaries, utilizing the 2020 United States Census geographic boundaries,

and a block equivalency file containing two columns. The first column shall list the 15-digit census block identification numbers, and the second column shall list the three-digit district identification number. Both block and district numbers shall be zero-filled text files. Such files shall be submitted in .xis, .xlsx, .dbf, .txt, or .csv file formats. The following is a sample:

```
BlockID, DISTRICT
"13001950100101","008"
"13001950100102","008"
"13001950100103","008"
"13001950100104","008"
"13001950100105","008"
"13001950100106","008"
```

4. If submission of the plan cannot be done electronically, the following requirements must be followed:
 - a. All drafts, amendments, or revisions should be on clearly-depicted maps that follow the 2020 Census geographic boundaries and should be accompanied by a statistical sheet listing the Census geography including the total population for each district.
 - b. All plans submitted should either be a complete statewide plan or fit back into the plan that they modified, so that the proposal can be evaluated in the context of a statewide plan. All pieces of Census geography must be accounted for in some district.

D. GENERAL GUIDELINES FOR PRESENTATION OF ALL PLANS

1. A redistricting plan may be presented for consideration by the Committee only through the sponsorship of one or more Member(s) of the General Assembly. All such drafts of and amendments or revisions to plans presented at any committee meeting must be on clearly-depicted maps which follow the 2020 Census geographic boundaries and accompanied by a statistical sheet listing the Census geography, including the total population and minority populations for each proposed district.
2. No plan may be presented to the Committee unless that plan makes accommodations for and fits back into a specific, identified statewide map for the particular legislative body involved.

3. All plans presented at committee meetings will be made available for inspection by the public either electronically or by hard copy available at the Office of Legislative and Congressional Reapportionment.
- E. These guidelines may be reconsidered or amended by the Committee.

EXHIBIT 12



U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

Washington, D.C. 20530

Honorable Michael Bowers
Attorney General
132 State Judicial Building
Atlanta, Georgia 30334

11 FEB 1982

Dear Mr. Attorney General:

This is in reference to the Congressional reapportionment provided for in Act No. 5 (1981), submitted to the Attorney General pursuant to Section 5 of the Voting Rights Act of 1965, as amended, 42 U.S.C. 1973c. Your submission was completed on January 22, 1982. In accordance with your request we have expedited our consideration of this matter.

We have given careful consideration to the information that you have supplied, along with relevant Census data and comments and information provided by other interested persons. Our analysis shows that, for the most part, the plan meets the requirements of Section 5. There continue to be concerns, however, regarding contentions which have been made to us regarding the proposed congressional districts in Fulton and DeKalb Counties as they affect the Atlanta metropolitan area.

At the outset, we note that proposed district 5 is 57.3% black in total population and that that figure represents a seven percentage point increase in black population from existing district 5, the one district which appears to offer the minority community some opportunity to elect a candidate of its choice. Thus, under Beer v. United States, 425 U.S. 130 (1976), the plan must be considered one which "enhances the position of minorities in respect to their effective exercise of the election franchise" and therefore cannot be said to have a racial "effect" within the meaning of Section 5.

- 2 -

However, Beer teaches also that "[i]t is possible that a legislative reapportionment could be a substantial improvement over its predecessor in terms of lessening racial discrimination, and nonetheless continue so to discriminate on the basis of race or color as to be unconstitutional." Beer v. United States, supra, 425 U.S. at 142, n. 14.

In respect to the latter teaching, the proposed plan divides an apparently cohesive black community of Fulton and DeKalb Counties between districts 5 and 4. The Georgia Senate proposed to assign this black community, which has grown significantly in the past decade, to one congressional district and the resulting district 5 proposed by the Senate was projected to be 69% black in total population. In regard to this circumstance, our letter of November 27, 1981, requested the state to provide any available information to rebut contentions that this described minority community was divided in the submitted plan in order to dilute minority voting strength and to minimize the chances of that community's electing a candidate of its choice to Congress.

The state's response essentially was that the minority community in this two county area is not "cohesive". However, other information indicates that the black residents of this area do share common interests, even though their economic status may vary. Our information also demonstrates a wide variation in economic status among the areas which were included in proposed district 5.

We also have been advised that the Senate's plan for the Atlanta area was rejected in order to preserve, to the extent possible, separate districts for Fulton and DeKalb Counties. The information we have, however, is conflicting. For example, the plan before us assigns to district 4 a substantial area of northern Fulton County, which area previously had been in district 5; and county lines in the Atlanta metropolitan area are crossed in other places. Thus, on the basis of information currently in hand, we are unable to conclude that an effort to preserve county lines necessitated the fragmentation of the black community. Also relevant

- 3

to our review is your statement that the portion of the black community which was included in proposed district 5 is "less politically active", which may explain the fact that even though district 5 has been increased in black percentage the district "has a 54% white voter registration."


As you know, under Section 5 of the Voting Rights Act, the submitting authority has the burden of showing that a submitted change has no discriminatory purpose or effect. See, e.g., Georgia v. United States, 411 U.S. 526 (1973); see also, Procedures for the Administration of Section 5, 28 C.F.R. 51.39(e) (46 Fed. Reg. 878). In this case, we have not been presented with information sufficient to enable us to reject the claims that the line between districts 4 and 5 was drawn to minimize the voting strength in that area. Under these circumstances, and in view of the fact that you have requested a decision at this time, I am unable to conclude that the State has satisfied the burden of proof required by Section 5. Thus, I am required to interpose a Section 5 objection, on behalf of the Attorney General, to the submitted plan. However, if additional information is available regarding this issue, we would be willing to reconsider this objection pursuant to the applicable provisions of the Procedures for the Administration of Section 5. See 28 C.F.R. 51.44.

Of course, as provided by Section 5 of the Voting Rights Act, you have the right to seek a declaratory judgment from the United States District Court for the District of Columbia that these changes have neither the purpose nor will have the effect of denying or abridging the right to vote on account of race, color or membership in a language minority group. However, until the objection is withdrawn or a judgment from the District of Columbia court is obtained, the effect of this objection is to render the congressional redistricting as authorized by Act No. 5 (1981) legally unenforceable.

- 4 -

If you have any questions concerning this letter,
please feel free to call Carl Gabel (202-724-8388),
Director of the Section 5 Unit of the Voting Section.

Sincerely,


Wm. Bradford Reynolds
Assistant Attorney General
Civil Rights Division

T. 2/11/82
WBR:GWJ:PFH:JIS:HEW:bhq
DJ 166-012-3

11 FEB 1982

Honorable Michael Bowers
Attorney General
132 State Judicial Building
Atlanta, Georgia 30334

Dear Mr. Attorney General:

This is in reference to the reapportionment of the Georgia House and Senate provided for in Act No. 3 (1981) and Act No. 4 (1981) submitted to the Attorney General pursuant to Section 5 of the Voting Rights Act of 1965, as amended, 42 U.S.C. 1973c. Your submission was completed on January 22, 1982. In accordance with your request we have expedited our consideration of this matter.

We have given careful consideration to the information that you have supplied. In addition, we have examined relevant Census data and comments and information provided by other interested persons. On the basis of our review we have determined that, for the most part, both plans would appear to meet the requirements of Section 5 of the Voting Rights Act. However, there do remain several areas of concern.

As you know, under Section 5 of the Voting Rights Act, the submitting authority has the burden of proving that a submitted change has no discriminatory purpose or effect. See, e.g., Georgia v. United States, 411 U.S. 526 (1973); see also, Procedures for the Administration of Section 5, 28 C.F.R. 51.39(e) (46 Fed. Reg. 878). By our letter of November 27, 1981, we pointed out some of the concerns that had been raised by our analysis and requested information from you to aid us in resolving those and other concerns which precluded us at that time.

- 2 -

from concluding that the proposed plans did not have the purpose and effect of denying or abridging the right to vote on account of race. Your responses of December 22, 1981 and January 18, 1982 permitted us to resolve a number of those concerns and led us to conclude that in most respects the state has satisfied the required burden of proof with respect to each plan. Questions remain, however, regarding the manner in which districts are drawn in a few areas of the state, as more fully described below.

Regarding the Senate plan, our concerns center on the districts in DeKalb County and Richmond County. In DeKalb County the existing plan provides a district (district 43) with a 69% black population; our information also indicates that approximately 57% of the registered voters in that district are black. The proposed plan substantially revises boundaries of the districts in this area with the result that new district 43 is projected to be 45% black in total population. While neighboring district 42 is projected to be 65% black in total population our information indicates that only 42% of the registered voters in that district would be black.

It has been claimed that the districts were drawn in this manner in order to dilute minority voting strength and to prevent the black community from electing a candidate of its choice to office. While the information before us regarding the purpose behind the manner in which the districts were drawn is conflicting, the information, as a whole, does demonstrate that the proposed plan will have the effect of making it more difficult for the minority community of DeKalb County to elect a candidate of its choice to the state Senate.

In Richmond County the proposed plan would decrease the black population percentage in district 22 from approximately 50% black to 48% black. In devising this district the state appears to have rejected the plan proposed by the Chairman of the Senate Reapportionment Committee which projected a 55% black population for district 22. We note that the City of Augusta, which is

- 3 -

53% black, recently elected a black candidate to the position of mayor. We note further that the asserted reason for the district in the submitted plan, namely, keeping the City of Augusta intact, appears to have been accomplished also in the 55% alternative. Thus, the rejection of the Chairman's plan and the reduction of black population in district 22 may have a significant detrimental impact on black voting strength.

Our concerns regarding the House reapportionment plan are limited to the manner in which the plan affects Dougherty County. The information we have indicates that the black population in Dougherty County has increased significantly in the past decade and is concentrated in defineable areas of the county. Under the existing plan the districts which incorporate these black concentrations (Districts 131, 132, 133, and 134) are 13.5%, 80.4%, 50.8% and 25% black, respectively. In the proposed plan, however, the comparable four districts (Districts 132, 133, 134 and 140) are 73.5%, 10.5%, 39.1% and 45.9% black, respectively. Accordingly, whereas blacks constitute a controlling majority in one district and a nominal majority in another in the present plan, they will constitute a majority in only one district under the proposed plan, in spite of their increase in the population. In our view this would, under Beer v. United States, 425 U.S. 130 (1976), be impermissible retrogression in the position of the affected minority.

We have been presented with no justification for this apparently unnecessary fragmentation of the black population concentration, and our analysis reveals none. Moreover, our research and analysis further indicate that by avoiding this unnecessary fragmentation the likely result would be a plan in which the black community would have a reasonable opportunity to elect candidates of its choice in two of the four districts affecting Dougherty County.

- 4 -

For these reasons I am unable to conclude that the state has satisfied its burden of demonstrating that the proposed reapportionment plans for the Georgia House and Senate do not have the purpose and will not have the effect of denying or abridging the right to vote on account of race. Thus, on behalf of the Attorney General, I interpose Section 5 objections to both plans.

As indicated above, the concerns which led to these objections are limited to a small number of districts. If the state takes action to remedy these concerns we believe that the plans could receive prompt Section 5 preclearance. We would also be willing to reconsider the objection, pursuant to the applicable provisions of the Procedures for the Administration of Section 5 (28 C.F.R. §51.44) if additional information is available indicating that our concerns are not well-founded.

Of course, as provided by Section 5 of the Voting Rights Act, you have the right to seek a declaratory judgment from the United States District Court for the District of Columbia that the House and Senate reapportionment plans have neither the purpose nor effect of denying or abridging the right to vote on account of race, color or membership in a language minority group. However, until the objections are withdrawn or a judgment from the District of Columbia court is obtained, the effect of these objections is to render the redistricting of the Georgia House and Senate as authorized by Act No. 3 (1981) and Act No. 4 (1981) legally unenforceable.

If you have any questions concerning this letter, please feel free to call Carl Gabel (202-724-8388), Director of the Section 5 Unit of the Voting Section.

Sincerely,

Wm. Bradford Reynolds
Assistant Attorney General
Civil Rights Division

EXHIBIT 13



U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

Washington, D.C. 20035

March 20, 1992

Mark H. Cohen, Esq.
Senior Assistant Attorney General
Department of Law
132 State Judicial Building
Atlanta, Georgia 30334

Dear Mr. Cohen:

This refers to Act No. 616 of the 1992 Regular Session, which provides for the 1992 redistricting of House districts; and Act No. 615 of the 1992 Regular Session, which provides for the 1992 redistricting of Senate districts; submitted to the Attorney General pursuant to Section 5 of the Voting Rights Act of 1965, as amended, 42 U.S.C. 1973c. Your submission was received on February 21, 1992; supplemental information was received on February 26, 27 and March 3, 4, 13, 17, 1992.

This also refers to Act No. 638 of the 1992 Regular Session, which provides for the 1992 implementation of an increase from ten to 11 Congressional seats for the State of Georgia with the 1992 redistricting of the Congressional districts, submitted to the Attorney General pursuant to Section 5 of the Voting Rights Act of 1965, as amended, 42 U.S.C. 1973c. Your submission was received on March 4, 1992; supplemental information was received on March 13, 17, 1992.

We have carefully considered the information you have provided, as well as Census data and information and comments from other interested persons. As you are aware, on January 21, 1992, the Attorney General interposed an objection to several areas of each of the House, Senate, and Congressional plans that the state had submitted for Section 5 review. In analyzing the instant remedial plans, we are mindful of our bases for interposing the original objections in an effort to determine whether the state has overcome such concerns. In addition, we also have an obligation to investigate and analyze the motivations of the state legislature with regard to the second round of redistrictings. It is in that light that we have determined that in a number of areas of the state, the legislature has remedied our objections. However, the following explanation is meant to provide guidance to the state with regard to those areas in all three submitted plans that continue to be a problem under Section 5.

The House Plan

In response to our objection to the failure of the state to recognize black population concentrations in the Peach/Houston area, the state submitted proposed District 140, referred to as the "Heart of Georgia" district. While the state maintains that this district is the "first viable rural Georgia minority House district in the modern history of the General Assembly," the fact is that the adopted plan continues to fragment and submerge significant black population concentrations. The state chose to draw the "Heart of Georgia" district into Peach County and divided the Houston County black voters among three majority white districts. Consequently, the proposed plan minimizes overall black voting strength in the heart of Georgia in an effort to protect an incumbent legislator. The state fails to articulate a legitimate nonracial reason for rejecting alternative plans which remedy the fragmentation and provide two viable black voting age majority districts in this area.

In the proposed House plan for the rural southwest region, we originally found that black concentrations were fragmented to ensure the re-election of white incumbents and that an additional black district could have been drawn. In response to our objection, the state simply moved black population into District 159 at the expense of the black population of proposed District 158. We are aware that there were alternative plans presented to the legislature that remedy this fragmentation and which provide two black voting age majority districts in this area. Similarly, in the Muscogee/Chattahoochee area, the state failed to remedy our concern that three viable black voting age majority districts were not drawn in this area due to inappropriate incumbency considerations.

In the Richmond/Burke Counties area, while the state appears to have cured our earlier objection to the fragmentation of minorities in Burke County, the state inexplicably includes a land bridge through Richmond County which connects Jefferson County with Columbia County (proposed District 120). Concerns were raised that the state's configuration in this area was designed to maintain a white majority legislative delegation rather than have an equal number of white and black legislators on the Richmond County delegation. While the state acknowledges that such a configuration would have this effect on the delegation, the state has yet to explain adequately its boundary choice in this instance.

The Senate Plan

The Senate plan also continues to include instances in which the concerns of the incumbents were placed ahead of black voting potential. For example, in the DeKalb/Clayton Counties area it appears that protection of incumbents motivated the legislature

to combine portions of Clayton County with Fulton County resulting in fragmentation of concentrations of black residents into four surrounding white majority districts in the Atlanta/DeKalb metro area (Districts 34, 42, 44, and 55). By failing to combine the black growth communities in Clayton County with the residents of the black neighborhoods in DeKalb, the state has minimized black voting potential in DeKalb County where three rather than two black voting age majority districts would have been the logical result of boundary lines that fairly recognize black voting strength in that area.

In the southwest portion of the state, from Meriwether and Peach/ Houston Counties to the Florida border, the state continues to fragment the black population concentrations by refusing to adopt alternative approaches in the Senate plan which would remedy this fragmentation and provide three districts with majority black voting age populations.

The Congressional Plan

As you know, the state's first proposed plan was rejected amid general concerns that the Georgia legislative leadership had been predisposed to limit black voting potential to two black majority voting age population districts. This concern continues with respect to the state's present redistricting plan. For example, our analysis of the process indicates that the primary controversy surrounding the Congressional plan was whether the Department's objection contemplated the drawing of a third black voting age majority district and that, while the Senate appeared to be willing to try to recognize black voting potential in the state, the House vigorously rejected such a concept.

For example, the submitted plan minimizes the electoral potential of large concentrations of black population in several areas of the state. Specifically, we note that alternatives, including one adopted by the Senate, included a large number of black voters from Screven, Effingham and Chatham Counties in the 11th Congressional District. However, due to unyielding efforts on behalf of the House members, this configuration was abandoned and no legitimate reason has been suggested to explain the exclusion of the second largest concentration of blacks in the state from a majority black Congressional district.

In southwest Georgia, our review of the proposed remedial plan indicates a similar concern. Although the submitted plan has increased the black percentage in the 2nd Congressional District, it continues the exclusion of large black population concentrations in areas such as Meriwether, Houston, and Bibb Counties from this district. In addition, the expressed reluctance to split counties also appears pretextual given the original announcement by the redistricting leadership that such

4

concerns should not be used to prevent the drawing of viable black districts. The state's willingness to split counties and cities in other areas of the state suggests an uneven application of its own stated criteria which appears designed to minimize black voting potential.

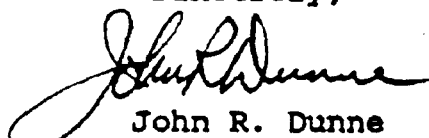
Several alternative redistricting approaches which created a southwest district with a majority black voting age population by including additional black communities such as the City of Macon and which did not diminish the effectiveness of the minority electorate in the 11th by including Chatham, were suggested to the legislature during the redistricting process. Despite the existence of the alternatives, however, the state refused to recognize potential black voting strength in the state and has failed to explain adequately the choices made during this round of Congressional redistricting.

In light of the considerations discussed above, I cannot conclude, as I must under the Voting Rights Act, that the state's burden has been sustained in this instance with respect to the three proposed plans under review. Therefore, on behalf of the Attorney General, I must object to the 1992 redistricting plans for Georgia State House, Senate and Congressional districts to the extent that each incorporates the proposed configurations for the areas discussed above.

We note that under Section 5 you have the right to seek a declaratory judgment from the United States District Court for the District of Columbia that the proposed 1992 House, Senate and Congressional redistricting plans have neither the purpose nor will have the effect of denying or abridging the right to vote on account of race or color. In addition, you may request that the Attorney General reconsider the objections. However, until the objections are withdrawn or a judgment from the District of Columbia Court is obtained, the 1992 redistricting plans for Georgia House, Senate and Congressional districts continue to be legally unenforceable. Clark v. Roemer, 59 U.S.L.W. 4583 (U.S. June 3, 1991); 28 C.F.R. 51.10 and 51.45.

To enable us to meet our responsibility to enforce the Voting Rights Act, please inform us of the action the State of Georgia plans to take concerning these matters. If you have any questions, you should call Sandra Coleman (202-307-3718), Deputy Chief of the Voting Section.

Sincerely,



John R. Dunne
Assistant Attorney General
Civil Rights Division

EXHIBIT 14



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Douglas leader's racial comments spark calls that he resign



LOCAL NEWS

By **Ernie Suggs**, The Atlanta Journal-Constitution

Sept 30, 2016

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A longtime Douglas County commissioner, under fire over a video recording of him making disparaging comments about black candidates and leaders, is being pressured to resign and end his bid for re-election.

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Commission Chairman Tom Worthan was secretly taped at a public county festival two weeks ago.

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Facing competition from a black woman, Worthan said governments run by blacks “bankrupt you,” and that if African-American sheriff candidate Tim Pounds were elected, “he would put a bunch of blacks in leadership positions.”

Article continues below



By Palm Coast and the Flagler Beaches

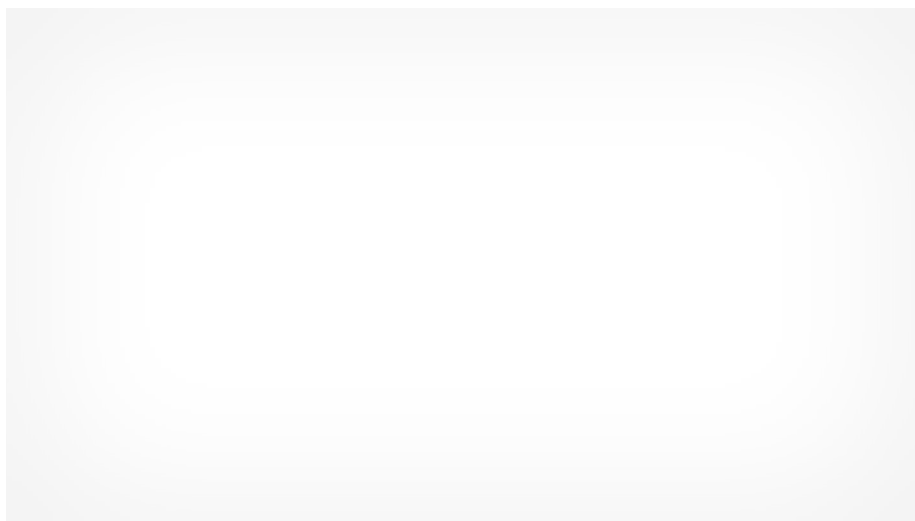
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He later adds: "I'd be afraid he'd put his black brothers in positions that maybe they're not qualified to be in."

After the tape surfaced, Worthan, who has been elected five times as county commissioner and the past three as chairman, went on Fox 5 Atlanta and apologized.

ADVERTISING



"I spoke as a politician, trying to say what I needed to say to get a vote," he told the TV station. "And that's unfortunate. And I certainly apologize for doing that."

Worthan has been on something of an apology tour. Rochelle Robinson, the first black and female mayor of Douglasville, said he called her personally to apologize. Robinson said she has known and worked with Worthan for years and never would have suspected such comments from him.

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"I am shocked, hurt and disappointed that he would make those statements. When he called and asked me to forgive him and admitted that he was pandering, I heard him out and forgave him," said Robinson, who was elected in December 2015. "I know who he is. My moral compass and Christian principles led me to forgive him. But I am not saying that the trust has not been broken and that we don't have work to do to get back to where we were."

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State Rep. William K. Boddie Jr., who won a Democratic runoff election in July to represent House District 62, which includes parts of Douglas County, isn't buying the mea culpa. In an open letter, he calls for Worthan not only to drop out of his race for re-election but to resign immediately from his current position.

"Your comments were racist and not mere political pandering. The racist and insensitive comments you made were not a mistake or a lapse in judgment. The racist and insensitive comments you made regarding African-American politicians and candidates represent your true feelings. That is your thought process. That's your mentality," Boddie wrote.

"I grew up under (former Atlanta mayors) Andy Young and Maynard Jackson. I have a lot of respect for them and what they accomplished," Boddie later told The Atlanta Journal-Constitution. "So for him to make a statement that no government has been successful under black politicians is offensive. He has lost touch with the constituents."

Douglas County is 45 percent black, according to a 2015 census estimate.

Calls to Worthan, whose bio on the county website lists him as a charter member of the Republican National Committee, were not returned Thursday or Friday. A spokesman for the Douglas County Commission said Worthan was likely on Jekyll Island.

William Boone, a political scientist at Clark Atlanta University, said Worthan's comments were an extension of the national narrative in the general election, particularly the racially tinged rhetoric coming out of the Trump campaign.

“It fits into the larger narrative about innuendo about the ability of certain groups of people — most notably blacks, Mexicans and women,” Boone said.

‘Have to pack up and get out’

Worthan was taped by longtime Douglas County resident Mark Dodd, who questioned the commissioner while running a cellphone video recorder hidden in his shirt pocket.

Dodd said Worthan, who is running against political newcomer Romona Jackson-Jones, had made racist comments to him before. So he wanted to get him on tape talking about Jackson-Jones and Pounds.

“I want black people to have the same opportunities that white people have. I’m tired of seeing black people arrested, beaten and killed for no reason,” said Dodd, a white man who has two mixed-race children.

“If white people are not going to stand up for what they believe is right, if we are not going to stand up for the African-American community, we’re just as bad as the people doing it.”

In the recording, Dodd asked Worthan what would happen if Jackson-Jones and Pounds won.

“Probably going to have to pack up and get out of here, you know?” Worthan said.

Between two men ‘and the lamp post’

Dodd kept pushing, assuring Worthan that their conversation was just between the two of them “and the lamp post.”

“Well, do you know of another government that’s more black that’s successful? They bankrupt you,” Worthan continued, adding that if Pounds becomes sheriff, he will “put a bunch of blacks in leadership positions.”

"I wasn't surprised, because I knew that is what he wanted to say," Dodd said.

Pounds, a 40-year veteran of the Douglas County Sheriff's Office, said he was blindsided by the "derogatory and disparaging comments" of Worthan, whom he once called a friend.

"As the chief executive officer of Douglas County, Tom Worthan should know that any negative remarks that he makes regarding any citizens of Douglas County based on race are unequivocally unacceptable," Pounds said Thursday. "I am very disappointed that Tom feels that race is a measure of a person's ability to lead and serve a community."

Pounds said while he has supported Worthan in the past, he will not vote for him in the Nov. 8 election.

Calls to Jackson-Jones, meanwhile, were not returned Thursday or Friday.

'A better way of making a statement'

Boone said the notion that black-run governments are inept is steeped in both racist beliefs of black inferiority and "a fear of being dominated by blacks."

"The number of cities that go bankrupt, that are run by African-Americans, does not exceed those run by whites," Boone said.

Yet he stops short of urging Worthan to resign or drop out of the race. Instead, he favors the democratic process.

"The resolution is to talk about inclusion. There needs to be a referendum in terms of a vote that will send a message," Boone said. "Voting him out of office is a better way of making a statement."

Boddie said protesters will attend Monday morning's County Commission meeting to call for Worthan's resignation.

About the Author

The Atlanta
Journal-Constitution

Ernie Suggs



Ernie Suggs is an enterprise reporter covering race and culture for the AJC since 1997. A 1990 graduate of N.C. Central University and a 2009 Harvard University Nieman Fellow, he is also the former vice president of the National Association of Black Journalists. His obsession with Prince, Spike Lee movies, Hamilton and the New York Yankees is odd.

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EXHIBIT 15

KFILE

GOP candidate's husband shares image urging voters to 'free the black slaves from the Democratic plantation'

By Andrew Kaczynski and Nathan McDermott, CNN
Published 4:58 PM EDT, Tue May 2, 2017



David Goldman/AP

STORY HIGHLIGHTS

The husband of Republican congressional candidate Karen Handel shared an image on his Twitter timeline Tuesday that urged voters to support his wife in order to “free
<https://www.cnn.com/2017/05/02/politics/kfile-karen-handel-husband-tweet/index.html>

the black slaves from the Democratic plantation."

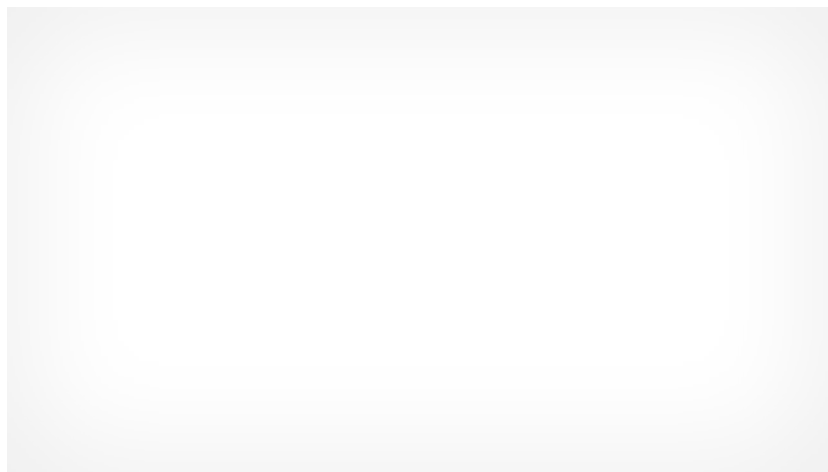
"Like many of us, he (Steve) made a mistake and retweeted something he didn't pay a lot of attention to, thinking it was just an absentee vote message," a campaign spokesperson said.

(CNN) — The husband of Republican congressional candidate Karen Handel shared an image on his Twitter timeline Tuesday that urged voters to support his wife in order to "free the black slaves from the Democratic plantation."

Handel's husband, Steve Handel, shared the image in the form of a quote-tweet, in which he shared the tweet of another user who initially posted the image and added his own commentary. In a statement to CNN's KFile on Tuesday, Handel's campaign said her husband hadn't paid attention to what was said in the original tweet.

"Like many of us, he (Steve) made a mistake and retweeted something he didn't pay a lot of attention to, thinking it was just an absentee vote message. It clearly was not appropriate and has been deleted," a campaign spokesperson said.

ADVERTISING



Handel is running to replace former Rep. Tom Price, who resigned his seat to become Health and Human Services Secretary. She's locked in a tight race in the runoff election with Democratic candidate Jon Ossoff.

The image, shared by user @rose10052, featured a stock image of young black man in a suit with white text.

"Criticizing black kids for obeying the law, studying in school, and being ambitious as 'acting white' is a trick Democrats play on Black people to keep them poor, ignorant, and dependent," text on the image reads. "Free the black slaves from the Democratic plantation."

"Handel will fight for minorities to excel," the image reads in bold letters at the top. The bottom of the image also tells people to "join the movement" to "send Karen Handel to Congress" with a link to her website.

Here's Handel's tweet:



stevehandel
@stevehandel

 **Follow**

Request your absentee ballot today to vote for
[@karenhandel](#)



Rose @rose10052

Today begins absentee ballot voting for GA6, be sure to get yours in for @karenhandel . Thank you!

RETWEETS

25

LIKES

19



5:44 AM - 2 May 2017

@stevehandel

And here's the tweet from @rose10052, which has since been deleted:



@rose10052

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EXHIBIT 16

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Roswell's Wood says 'Ossoff' has off-puttingly Muslim ring

Mar 15, 2017

When my family moved to Roswell in the 1960's, muted turmoil surrounded school integration. My mother had helped with voter registration of African-Americans.

At school, I was earmarked as "liberal" about racial integration. The African-American children, myself and a bewildered boy from the North were set in two rows, slightly removed from the class, an arrangement replicated on field trips, etc.

I understood little of the undercurrents: the bravery of the black students, the ways in which many white students who used the "n" word, were merely conforming to the words they heard.

It was elementary school for heaven's sakes!

Decades have passed since those days of racial distrust. Good schools and beautiful parks now symbolize Roswell. But I was discouraged to read a recent article in the New Yorker magazine.

Mayor Jere Wood makes a wry observation about a candidate for the April special election in the 6th Congressional District, Jon Ossoff.



“This isn’t a youth vote ... here,” he told me at his office, when I asked him about the makeup of the Siixth. “This is a mature voter base,” he paused.

“If you just say ‘Ossoff,’ some folks are gonna think, ‘Is he Muslim? Is he Lebanese? Is he Indian?’ It’s an ethnic-sounding name, even though he may be a white guy, from Scotland or wherever.”

What an interesting way to characterize Roswell’s voters!

Wood remarks how Ossoff’s name has an off-puttingly Muslim ring, not quite white.

I hope immigrants, who helped build Roswell and live here, note implications of Wood’s ‘mature voter,’ as one who votes based on race, religion or ancestral origin.

Maybe those days when many white students shunned black students are not so far away.

I equally hope that ‘mature’ voters respond to candidates’ integrity and ideas. Or is it still 1966 where “white guy” is the main qualification?

– Kareen Malone, Roswell

Tags

[Jon Ossoff](#)[Jere Wood](#)[Politics](#)[Roswell](#)[Voter](#)

EXHIBIT 17



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Warring Republicans try to unite against Ossoff in Georgia's Sixth

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POLITICAL INSIDER

By **Greg Bluestein**, The Atlanta Journal-Constitution

April 15, 2017

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Fractional Georgia Republicans tried to unite behind a "stop Jon Ossoff" movement ahead of Tuesday's special election to represent a suburban Atlanta district, with party leaders urging voters to stream to the polls and prevent an upset victory by the Democrat.

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Republicans face a daunting enthusiasm gap in the 18-candidate race to represent the 6th District, and the leading GOP contenders have spent the final days feuding with each other. Ossoff, one of five Democrats in the race, is leading in the polls - and aiming for an outright victory in Tuesday's vote.

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At a GOP voter drive in the district's western flank of Marietta, about 30 volunteers and officials turned out to make calls and listen to several likely Republican statewide candidates.

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By Palm Coast and the Flagler Beaches

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A long weekend getaway is calling in this unspoiled Florida town

"This is personal," said Attorney General Chris Carr, who lives in Dunwoody. "We have great candidates. But whoever you support is better than the other side. They are trying to embarrass us, but let's show them this district is Republican red."

At a GOP breakfast on the district's eastern DeKalb outskirts, state Sen. Fran Millar criticized Democrats who think it's a "done deal that this kid's going to become the Congressman."

"I'll be very blunt: These lines were not drawn to get Hank Johnson's protégé to be my representative. And you didn't hear that," said Millar. "They were not drawn for that purpose, OK? They were not drawn for that purpose."

Millar, a Dunwoody Republican, has endorsed former state Sen. Dan Moody in the race.

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Ossoff, a 30-year-old ex-congressional aide, has marshaled thousands of volunteers – and droves of paid staffers – to blanket the district. His **unprecedented \$8.3 million fundraising haul** along with Donald Trump's struggles in the area – he won it by less than 2 points – give Democrats hope he can flip the seat.

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And he's tried to tap into the electorate's mood by vowing to "stand up to Donald Trump" while also hewing to some conservative themes, such as a pledge to cut wasteful spending.

The Republicans on the ballot are all gunning for chance to square off with Ossoff in a June 20 runoff - if they can keep his **numbers under 50 percent**. Meanwhile, the leading GOP contenders and their supporters are pummeling each other with attack ads.

On Saturday, Republican leaders tried to shift the criticism to Ossoff. State Rep. Sam Teasley of Marietta said Ossoff's platform is chock-full of "left wing priorities."

"The national media would love to make this a story about a turning tide," said Teasley. "But we aren't going to let that happen."

Georgia GOP chair John Padgett compared the surge of attention around Ossoff's campaign to the failed 2014 bids of "little blue-headed folks" Jason Carter and Michelle Nunn.

“What got them beat is you. You got out and outworked them,” he said. “And you’ll do it again.”

More: [National implications push Georgia special election into spotlight](#)

About the Author

The Atlanta
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Greg Bluestein



Greg Bluestein is a political reporter who covers the governor's office and Georgia politics for The Atlanta Journal-Constitution. Order his book on Georgia politics at bit.ly/FlippedTheBook.

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EXHIBIT 18



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Gwinnett commissioner calls John Lewis 'a racist pig,' faces backlash



NEWS

By **Tyler Estep**, The Atlanta Journal-Constitution

Jan 16, 2017

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Gwinnett County Commissioner Tommy Hunter found himself facing calls for his resignation Monday, just two days after his social media post calling **civil rights icon and U.S. Rep. John Lewis** "a racist pig."

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Hunter is one of the highest elected officials in one of Georgia's largest and most diverse counties.

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The commissioner wrote the controversial Facebook post on Saturday, amid a well-publicized feud between Lewis and President-elect Donald Trump — and in the middle of a weekend set aside to honor **the Rev. Martin Luther King Jr.**, a close friend of Lewis.

Article continues below



By Palm Coast and the Flagler Beaches

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This unspoiled beach town is calling you to a getaway

Lewis ignited the dispute Friday, when he said he would not be attending Trump's inauguration on Friday and said **he didn't consider him "a legitimate president."** Trump then responded on Twitter, calling Lewis "all talk" and proclaiming his Congressional district — **which includes most of the city of Atlanta** — to be **"in terrible shape and falling apart."**

After The Atlanta Journal-Constitution published screenshots of several of Hunter's posts on Monday, the Gwinnett Democratic Party asked the commissioner to apologize and resign.

MORE: Bernie Sanders in Atlanta: MLK would be outraged at Trump White House

MORE: Mike Pence: I am 'so disappointed' in John Lewis

MORE: Photos from Gwinnett County's 2017 MLK Day parade

Hunter was alternately conciliatory and defiant Monday. He told The AJC that his "racist pig" comment was "probably an overreaction" and eventually deleted the Facebook post in question. But he left several other potentially controversial posts up and later wished his followers a "Happy MLK Day."

“Remember it’s the content of your character, not the color of your skin that matters,” Hunter wrote. “Someday, hopefully that will become reality.”

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Asked if Hunter would apologize, campaign consultant Seth Weathers said on Monday that the commissioner was “making a point about Lewis.”

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“[Lewis’] past as a civil rights leader was great and Republicans are supportive of it,” Weathers said. “That doesn’t mean someone can make false statements and get away with it.

“Take out Lewis’ past and deal with the here and now. What someone accomplished yesterday doesn’t make up for making false statements now. What was his comment calling Trump illegitimate based on? If a Democrat screams racist it’s a fact. But if a Republican accuses someone of doing something racist, everyone screams that the Republican is racist.”

'A disgrace to Gwinnett'

Hunter's colleagues on Gwinnett's Board of Commissioners - including Chairwoman Charlotte Nash - did not respond Monday to multiple requests for comment on Hunter's posts. Hunter and the rest of the county commissioners are scheduled to have their next meeting on Tuesday.

While they and other local GOP leaders remained silent, Democrats were happy to weigh in.

State Rep. Dar'shun Kendrick, whose District 93 touches part of Hunter's territory in Gwinnett, shared her thoughts on Twitter, saying she was "ashamed."

Gwinnett Democratic Party Chairman Gabe Okoye called Hunter "a disgrace to Gwinnett County in particular and Georgia in general."

Hunter, who was first elected to his county post in 2012 and narrowly won re-election in November, represents the county's District 3. That region covers a wide and diverse swath of southern and eastern Gwinnett, including parts of Snellville, Loganville, Grayson and Dacula.

Though much of suburban Gwinnett remains a Republican stronghold, **Hillary Clinton won the county in November's presidential election**. It was the first time a Democrat took Gwinnett since Jimmy Carter in 1976.

With nearly 900,000 residents, Gwinnett is also the second-most populous county in Georgia and a majority-minority county, meaning non-white residents account for more than half of its population.

Not shy about posting

Hunter is the vice president of a local environmental testing firm and, prior to his time on the board, he worked in the county's department of public utilities and served on its water and sewage authority and its planning commission.

Hunter represents himself as a staunch conservative and has questioned county proposals for things like mass transit.

He's never been shy about posting his opinions on social media.

On Sunday, a day after the "racist pig" post, Hunter took aim at Lewis a second time, calling the longtime congressman's election wins "all illegitimate" because his district, which covers most

of the city of Atlanta, is “drawn to keep him in power.”

He later posted an image that included this phrase: “If you’re easily offended and looking for a ‘safe place’ my page ain’t it.. Move along snowflake.”

Sometime shortly before 11 a.m. Monday, however, the “racist pig” post was no longer on Hunter’s timeline. Other posts remained — including ones that mock U.S. Rep. Hank Johnson; ask if there were “any white guys” on the University of Alabama’s football team; and criticize Gov. Nathan Deal’s decision to declare a state of emergency ahead of last weekend’s ultimately uneventful winter storm.

Hunter’s page saw an influx of nasty comments Monday, many of which called the commissioner disparaging names or urged him to “stay classy.”

Donna McLeod, a Democrat who narrowly lost her bid last year for Ga. House District 105, which is partially in Hunter’s district, said she wasn’t surprised by Hunter’s comments.

"This is the kind of campaign that the president-elect ran," said McLeod, who was attending **Gwinnett's MLK parade Monday.**

Not all of the feedback on Hunter’s comments was negative, though. Many comments on Hunter’s Facebook page expressed support. And Jasmine Smith, a black woman who described herself as a personal friend of Hunter’s, posted on his Facebook page to call him “a fantastic man with an exceptional heart.”

“So what if he openly put his view on [Facebook],” Smith wrote. “We all do a little too much of that. So if expressing yourself on [Facebook] is now wrong we all need to get off.”

—Staff writers Lauren Foreman and Greg Bluestein contributed to this article.

About the Author

The Atlanta
Journal-Constitution

Tyler Estep



Tyler Estep is a reporter covering DeKalb County, its government and its people. A Gwinnett County native and University of Georgia graduate, he has been with the AJC since 2015. He previously covered his home county and served stints on the paper's hyperlocal and breaking news teams.

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EXHIBIT 19

The Washington Post
Democracy Dies in Darkness

Racist ‘magical Negro’ robo-call from ‘Oprah’ targets Stacey Abrams in Georgia governor’s race



By Cleve R. Wootson Jr.

November 5, 2018 at 9:07 a.m. EST

For years, Oprah Winfrey’s campaign rally appearances and political endorsements have posed a difficult question for anyone who happens to be advocating for the candidate on the other side: How do you contend with the star power of a billionaire Queen of All Media who is also one of the world’s most influential people?

For one robo-call producer speaking into a microphone in what we can only assume is a dark basement, the answer is clear: an 11th-hour infusion of good old-fashioned racism.

“This is the magical Negro Oprah Winfrey asking you to make my fellow Negress Stacey Abrams the governor of Georgia,” the robo-call begins, before spewing nearly 60 seconds of racism coupled with a dash of anti-Semitism. Georgians began hearing the call last week, according to the Hill.

The video is made by TheRoadToPower.com, an anti-Semitic video podcasting website that the Anti-Defamation League says “has zeroed in on divisive political campaigns across the country,” including two of the three races that feature a black candidate for governor. It’s unclear how many Oprah Winfrey robo-calls have been received.

The robo-call labels Abrams “a poor man’s Aunt Jemima,” a reference to the black lady on the front of the pancake mix box, an image that has itself been derided as a racist symbol. It suggests that Winfrey is a media construction made to trick fat, white women into voting. And it mocks what Winfrey has called one of her all-time happiest moments in media.

“And so I promise that every single person who votes for Stacey Abrams, you’re going to get a new car! So you get a car! And you get a car! And you get a car! And you get a car! Everybody gets a car!”

In a statement, the Abrams campaign called the robo-calls a desperate and “vile” attempt to sway voters using “poisonous thinking.”

“It is not surprising that in a race that has consistently been very close, we’ve seen several weeks of increasing desperation from many dark corners trying to steal the election, cheat, lie, and prey on people’s fears rather than having the respect to listen to voters and speak to their hopes,” Abrams spokeswoman Abigail Collazo said in the statement, which tried to link the robo-calls to a tone set by President Trump and Abrams’s Republican opponent, Brian Kemp.

In a statement emailed to the Hill, Kemp called the robo-call “vile,” “racist” and “absolutely disgusting.”

“I stand against any person or organization that peddles this type of unbridled hate and unapologetic bigotry,” he said.

But Abrams said Monday that Kemp has been racially insensitive in the past.

“I think it’s a little late for him to repudiate racist remarks given that he’s stood with someone wearing an anti-Islam T-shirt,” she said on CNN. “He refused to denounce the same man earlier who accused black veterans of not being people who support our country.”

She also addressed the racist attacks in the robo-call.

“Regardless of any racist tropes that are out there, I believe in what is best for Georgia,” she said. “Yes, I am changing the face of what leadership looks like, but I’m doing so having the greatest experience of anyone on the ballot.”

The insidious tone of the poor-audio call was at odds with Winfrey’s words on the campaign trail.

She and Abrams are both black women from Mississippi, and the media titan spoke of the sacrifices their ancestors had to make to obtain the right to vote.

“Make your voice heard on Nov. 6. We have this incredible opportunity to make history. We have our inalienable right, because the one place that all people are equal is at the polls,” she told voters.

“And I’m here today because of the men and because of the women who were lynched, who were humiliated, who were discriminated against, who were suppressed, who were repressed and oppressed, for the right of the equality of the polls. And I want you to know that their blood has seeped into my DNA, and I refuse to let their sacrifices be in vain.”

If the voice and the overtly racist tone on the robo-call sound familiar, it's because it's from the same studio that stuffed a "We Negroes" robo-call down the throats of Florida voters, who are deciding whether they want Tallahassee Mayor Andrew Gillum to be the state's first black governor.

"Well, hello there," that call begins, as the sounds of drums and monkeys can be heard in the background, according to the New York Times. "I is Andrew Gillum."

"We Negroes . . . done made mud huts while white folk waste a bunch of time making their home out of wood an' stone."

The speaker goes on to say Gillum will pass a law letting African Americans evade arrest "if the Negro know fo' sho' he didn't do nothin'."

In a statement emailed to The Washington Post, Gillum campaign spokesman Geoff Burgan said: "This is reprehensible — and could only have come from someone with intentions to fuel hatred and seek publicity."

Read more:

For black women in Georgia backing Abrams, a chance to break 'the ceiling on top of the glass ceiling'

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EXHIBIT 20

SLATE

GREEN JUICE, CHICK LIT, DRAG QUEEN



THE INDUSTRY

It Was Too Easy for Brian Kemp's Last-Minute Dog Whistle About Stacey Abrams to Go Viral

BY APRIL GLASER

NOV 06, 2018 • 11:46 PM



Kemp knew what he was doing. Photos by Jessica McGowan/Getty Images

Somehow, the Georgia gubernatorial race only got uglier and uglier. After a weekend in which Republican Brian Kemp—now likely the state's next governor—accused Democrats of “potential cybercrimes” without citing any evidence, on Monday the candidate issued a tweet in which he tried to associate his opponent, Democrat Stacey Abrams, with the New Black Panther Party, a radical organization described as a militant hate group by the Southern Poverty Law Center. Kemp latched onto photos that surfaced after some members of the New Black Panther Party were photographed marching in support of Abrams on Nov. 3. The photos quickly percolated into far-right Facebook groups, according

to research from Media Matters, and eventually achieved viral liftoff with help from Kemp and conservative websites—a depressing example of how loudly a racist dog whistle can resonate with voters over social media.



The next day, Monday, the Kemp campaign posted the photos to its accounts on Facebook, Instagram, and Twitter. “How radical is my opponent? Just look at who is backing her campaign for governor,” Kemp wrote in his captions on Instagram and Facebook. “The New Black Panther Party is ‘a virulently racist and antisemitic organization whose leaders have encouraged violence against whites, Jews and law enforcement officers.’ SHARE if you agree that Abrams and the Black Panthers are TOO EXTREME for Georgia!” The Facebook post was shared more than 38,000 times. From there, dozens of news articles from conservative sites, YouTube videos, and memes on Facebook pages have gone viral. On Tuesday, Kemp ran an ad on Facebook promoting the image, continuing to call Abrams a “radical.”

Breitbart went with the headline “Armed Black Panthers Lobby for Democrat Gubernatorial Candidate Stacey Abrams,” though they were not lobbying by any definition. Still, the post was shared more than 22,000 times on Facebook. The Daily Caller’s post associating the New Black Panthers with Abrams was shared more than 16,000 times. Conservative YouTube personality Anthony Brian Logan made a video on Monday that was viewed more

than 20,000 times. For perspective, a post about Kemp's investigation of the state's Democratic party for cybercrime on the New York Times' Facebook page was shared fewer than 1,800 times.

Abrams has never associated with the New Black Panther Party, but the optics of armed black radicals marching for a black Democratic candidate were apparently simply too juicy for the Kemp campaign, conservative media organizations, and their fans on social media to avoid sharing. Conservatives hammered on the attack through Tuesday, probably because it simply seemed to be working, taking it further and further. One meme on the Facebook page Trump Train warned that the New Black Panther Party may try to block voters at polling places, imploring people to call the police if it happens.

Social media is perfect for promoting false narratives driven by engaging visuals, and the photos of armed black men supporting a black woman running for office were incredibly easy for voters to draw false conclusions about. People share things that they think will concern others. Fears multiply as media consumers turn to stereotypes to understand the imagery they're presented with. And when the conservative media machine revs up, it offers just enough context for people to stay convinced that their fears are justified. It doesn't matter if one side corrects the record, because corrections never travel as far. Perhaps in a healthier media environment, fearmongering and blatant misinformation wouldn't get as much oxygen. But Facebook isn't a healthy media environment, and it's working exactly the way it was designed—to pluck emotions and confirm biases. That's what played out in Georgians' social media feeds over the past few days. There's no nice way to spin it. ■

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EXHIBIT 21

**NATION****Brian Kemp****Add Topic**

Georgia gubernatorial candidate Brian Kemp suggests truck is for rounding up 'illegals'

**William Cummings**

USA TODAY

Published 9:18 p.m. ET May 10, 2018 | Updated 9:24 p.m. ET May 10, 2018

Georgia gubernatorial candidate Brian Kemp, who sparked outrage with a campaign ad in which he threatens his daughter's teen suitor with a shotgun, is making headlines again with an ad where he says he owns a truck "in case I need to up round criminal illegals."

Kemp, who describes himself as a "politically incorrect conservative" in the ad released Wednesday, is serving as Georgia's secretary of state.

"I got a big truck, just in case I need to round up criminal illegals and take 'em home myself," Kemp says, adding, "Yep, I just said that," for emphasis.

At another point in the ad, Kemp says, "I'm so conservative, I blow up government spending" as a fake explosion goes off in the background.

"I own guns," Kemp says as he works the pump action on a shotgun, "that no one is taking away."

Kemp was accused of making light of gun violence in a commercial last month where he aims a shotgun toward a young man named "Jake," who wants to take out his daughter.

Kemp asks Jake the two keys to dating one of his daughters. "Respect, and a healthy appreciation for the Second Amendment," Jake responds.

"We're gonna get along just fine," Kemp says with a smile, after slapping the double-barrel shotgun closed.

After many angry responses to the ad, Kemp tweeted that, "Liberals in the media are losing their minds off a fake controversy. The real problem they have is that I'm an unapologetic conservative & proud defender of the 2nd Amendment. I won't back down, cave in, or compromise my values."

Kemp is one of six GOP candidates running to replace outgoing Republican Gov. Nathan Deal who is term-limited.

A poll in February showed Lt. Gov. Casey Cagle leading the field with 27% of the vote, with Kemp in second with 13%.

EXHIBIT 22

Kelly Loeffler's new Facebook ad darkens skin of Raphael Warnock, her Black opponent

The campaign spent 10 times as much boosting the ad as it did on another ad the same day that used untouched clips

By **ROGER SOLLENBERGER**

PUBLISHED JANUARY 4, 2021 7:02PM (EST)

Kelly Loeffler, in front of two screenshots of Raphael Warnock from her negative campaigns (Photo illustration by Salon/Getty Images/Kelly Loeffler Official Campaign)

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en. Kelly Loeffler, R-Ga., ran a paid Facebook ad last week that artificially darkened the skin

According to the Facebook Ad Library, on Dec. 29 the Loeffler campaign spent between \$3,000 and \$3,500 on an ad called **"Too Radical. Too Corrupt,"** and dropped between \$40,000 and \$45,000 on a second, more aggressive counterpart titled **"Beyond Radical Raphael,"** which uses some of the same footage, but with Warnock's skin noticeably darkened. Here are screenshots taken from the two ads:





Advertisement:



The second ad darkens Warnock's skin throughout, including in a video clip pulled from **a sermon** he gave in 2011 at Atlanta's historic Ebenezer Baptist Church, the former pulpit of the Rev. Martin Luther King Jr., where Warnock is now senior pastor.



Additionally, the second ad's title card is a version of an Associated Press **photo** from November that has been colorized, featuring Warnock with darker skin.

The two ads deploy similar copy, but the second spot — which as of Monday evening had racked up around **1 million impressions** — is more aggressive. The first ad's caption claims

the darkened ad says that Warnock is "beyond Radical," and was "trained by Marxists." It ends: "Warnock isn't just radical — he's dangerous."

"Given that Kelly Loeffler has run the single most negative campaign in Georgia history, there is no level she could stoop to that would surprise us," Warnock campaign spokesperson Terrence Clark told Salon.

Advertisement:



Loeffler, a former financial executive whose rapidly expanding wealth made her a billionaire last week, recently came under fire for **appearing in a photo with Chester Doles**, a white supremacist and former Ku Klux Klan imperial wizard who maintains extensive ties to the neo-Nazi movement.

"Kelly had no idea who that was, and if she had she would have kicked him out immediately because we condemn in the most vociferous terms everything that he stands for," Stephen Lawson, a Loeffler campaign spokesperson, explained to the **Atlanta Journal-Constitution**.

Doles, however, had already been thrown out of a Loeffler campaign **event** in September — not by Loeffler's campaign, but by Rep. Marjorie Taylor Greene, R-Ga. (then a congressional

candidate), who had herself felt backlash when Doles attended one of her campaign events earlier that year.

In a debate earlier this month, Loeffler called Warnock a "radical liberal" more than a dozen times, while declaring "There is not a racist bone in my body." In response, a coalition of more than 100 Black pastors in Georgia blasted the unelected Republican in an open letter, arguing that her attacks amounted to an affront on the Black church. Loeffler had been "demonstrating disdain for Black elected officials and Black Lives Matter marches," they wrote, while "remaining silent on the antics of the Proud Boys and Wolverine Watchmen," a reference to the militia group that had allegedly plotted to kidnap and kill Michigan Gov. Gretchen Whitmer, a Democrat. The letter called for Loeffler to "cease and desist" in her criticism of Warnock's ministry.

Advertisement:

In the 2020 campaign, Sen. Lindsey Graham, R-S.C., ran a Facebook ad that featured his Democratic challenger, Jaime Harrison with darkened skin, and Sen. David Perdue, R-Ga., the incumbent in Georgia's other Senate runoff election, was dragged for mocking Vice President-elect Kamala Harris' name.

The Perdue campaign said he had "simply mispronounced Senator Harris' name, and he didn't mean anything by it."



In July, the Perdue campaign removed an ad that appeared to enlarge the nose of his Democratic opponent, Jon Ossoff, who is Jewish, amid criticism that it was anti-Semitic.

Multiple officials with the Loeffler campaign failed to reply to Salon's requests for comment.

By **ROGER SOLLENBERGER**

Roger Sollenberger was a staff writer at Salon (2020-21). Follow him on Twitter [@SollenbergerRC](#).

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EXHIBIT 23

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Perdue's campaign deletes ad that enlarges Jewish opponent's nose, insists it was accident

Senate candidate Jon Ossoff and top Georgia Dems slam the ad as "anti-Semitic."

By [Briana Stewart](#) and [Quinn Scanlan](#)

July 28, 2020, 9:45 PM



Democrat Jon Ossoff makes final push on election day in Georgia

ABC News' MaryAlice Parks talks with the candidate vying to flip the 6th Congressional District in Georgia.

[Jon Ossoff](#), the Democratic candidate challenging incumbent [Sen. David Perdue](#) this November, slammed the Georgia Republican after his campaign posted a Facebook fundraising ad where Ossoff's nose was slightly enlarged, an image the Jewish Senate hopeful called a "classic anti-Semitic trope."

The Perdue campaign called the facial distortion an "unintentional error" by the vendor, and stressed that the senator did not see the ad before it was posted.

"In the graphic design process handled by an outside vendor, the photo was resized and a filter was applied, which appears to have caused an unintentional error that distorted the image. Obviously, this was

accidental, but to ensure there is absolutely no confusion, we have immediately removed the image from Facebook," a Perdue campaign spokesperson said in a statement to ABC News.

"Anybody who implies that this was anything other than an inadvertent error is intentionally misrepresenting Senator Perdue's strong and consistent record of standing firmly against anti-Semitism and all forms of hate," the statement continued.

MORE: Democratic candidates vying to unseat Sen. David Perdue see Georgia as critical battleground

The now-deleted ad began running on June 22 and made between 3,000 and 4,000 impressions on Facebook before it was removed, according to a report from the [Forward](#), which was the first publication to report on the ad.



In addition to the nose enlargement issue, Ossoff's campaign pointed to the text of the ad, which says Ossoff and Minority Leader Sen. Chuck Schumer -- who is also Jewish -- are trying to "buy Georgia." Ossoff's team called that

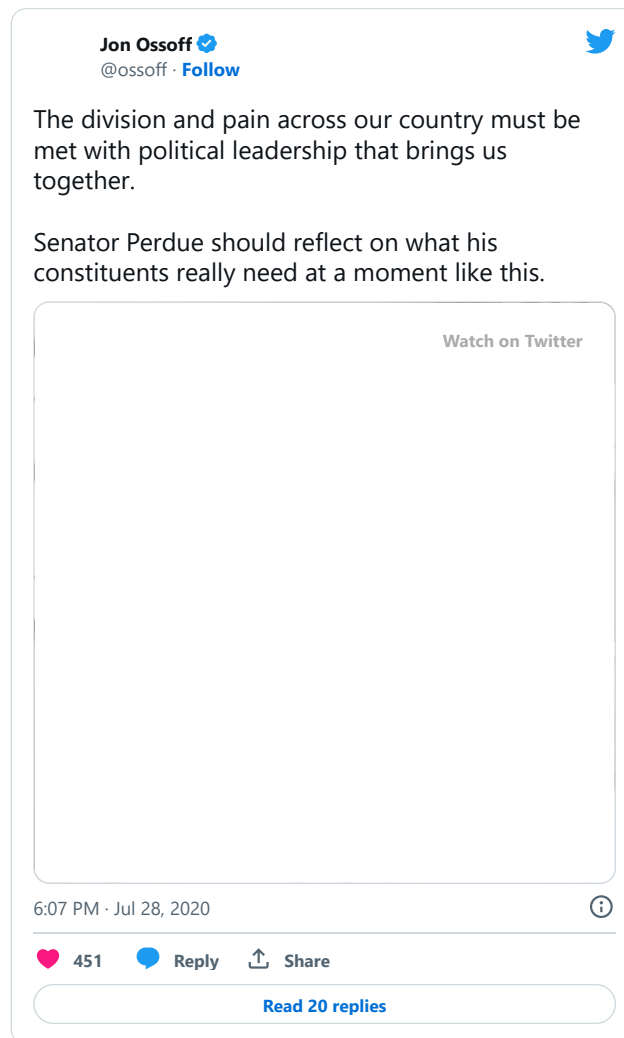
Perdue's campaign deletes ad that enlarges Jewish opponents' nose, insists it was accident, ABC News

a "not-so-subtle allusion to centuries-old anti-Semitic attacks against the Jewish people."

Miryam Lipper, Ossoff's campaign manager, said, "Everyone in politics knows this was no technical error."

"Shady Facebook ads are where campaigns try to do their targeted dirty work. This is just old school anti-Semitism, trying to fly under the radar, disgraceful for a sitting Senator, and David Perdue got caught in the act," Lipper said in a written statement.

ABC News did not hear back from Ossoff's campaign after asking if the candidate accepts the possibility that the ad may have been an accident.



In a press conference Tuesday, Ossoff challenged Perdue to donate the money his campaign made from the ad to charitable organizations that promote unity.

"At a moment like this when we need healing and when we need unity, for my opponent to stoop to this kind of incredibly divisive inappropriate offensive tactic is really disturbing and it's unbecoming of a sitting U.S. senator," Ossoff told reporters.

"This was an ad that was seen by thousands of Georgians. It was a fundraising act. I call upon Sen. Perdue to take the money that he raised using this manipulated image of my faith and donate that money to groups that promote community healing, and community unity, and tolerance because after these last four years that's what we need here in this country," he continued.

[Nikema Williams](#), Chairman of the Democratic Party of Georgia, echoed Ossoff sentiments saying the ad has "no place in our politics."

MORE: Jon Ossoff wins Georgia Senate primary; will face Perdue

"Now more than ever, we have to combat the ugly hatred we've seen continue to rear its head in this country. Senator Perdue must immediately fire the campaign vendor who made this ad, apologize to Jon Ossoff, and take responsibility for injecting these kinds of hurtful stereotypes into this election," Williams said in a written statement.

Following the backlash, Perdue's campaign said it would start to use a new company for digital fundraising.

"In light of an unfortunate and inadvertent error involving one of our Facebook advertisements produced and placed by an outside vendor, our campaign will be making a change to a new digital fundraising company. Senator Perdue did not know about nor see the ad before it ran, and he is committed to ensuring future mistakes of this kind do not occur," Ben Fry, Perdue's campaign manager, said in a statement to ABC News.

When asked if the sitting Georgia senator would consider donating the money raised from the attack ad, the campaign had no further comment.



Senator David Perdue

U.S. Senate Photographic Studio-/U.S. Senate Photographic Studio

Former Sen. Norm Coleman, chairman of the Republican Jewish Coalition, defended Perdue, touting their long-standing relationship and calling him a "true friend" and "ally to the Jewish community."

"Sen. Perdue has stood with the Jewish community in both combatting anti-Semitism and his unwavering commitment to the security of the Jewish state of Israel. On a personal note, I know Senator David Perdue to be one of the most decent individuals I have known. He is what my grandmother would call a "mensch": a person of honor and high integrity. Any attempts to smear him with charges of anti-Semitism are simply false," Coleman said.

(MORE: Jon Ossoff avoids runoff, secures Democratic nomination in Georgia Senate race)

Democrats are eyeing the Ossoff-Perdue race as a potential pick-up opportunity as they try to flip control of Congress's upper chamber. On

Thursday, the nonpartisan Cook Political Report moved the race from "lean R" -- meaning Perdue had the advantage -- to a "toss-up," giving even more weight to the notion that Georgia is a battleground on every level this cycle.

Ossoff, a media executive/investigative journalist, narrowly avoided a runoff election in June. He first rose to prominence when he narrowly lost to former Rep. Karen Handel, R-Ga., in the 2017 special election for Georgia's 6th Congressional District, which is still the most expensive House race ever.



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EXHIBIT 24

Georgia Republican senator willfully mispronounces Kamala Harris' name at Trump rally

By [Donald Judd](#) and [Ryan Nobles](#), CNN

Updated 1:20 PM EDT, Sat October 17, 2020



 Video Ad Feedback

GOP senator deliberately mispronounces Harris' name at Trump rally

01:15 - Source: [CNN](#)

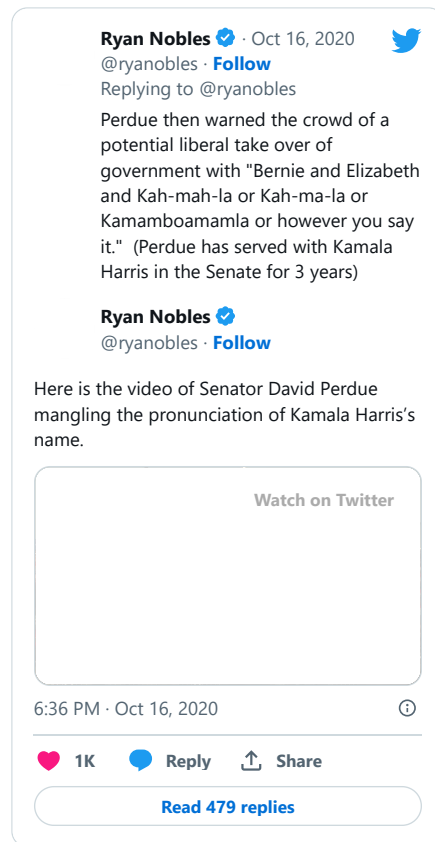
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(CNN) — Sen. David Perdue, a Georgia Republican who's locked in a tight reelection battle against Democrat Jon Ossoff, willfully

<https://www.cnn.com/2020/10/16/politics/david-perdue-kamala-harris/index.html>

mispronounced his Senate colleague Kamala Harris' name on Friday during remarks ahead of President Donald Trump's rally in the Peach State.

Perdue, who serves on the Senate Budget Committee with Harris, was speaking ahead of the President's arrival in Macon when derisively referred to the vice presidential candidate as "Ka-MAL-a (sic), Ka-MAL-a or Kamala, Kamala, Ka-mala, -mala, -mala, I don't know, whatever," to laughter from the crowd.



Ossoff quickly criticized Perdue for the remark, writing in a series of tweets, "My opponent, GOP Sen. David Perdue of anti-Semitic attack ad infamy, just mocked Sen. Harris' name as 'Kamala-mala-mala-whatever' at a Trump rally. We are so much better than this."

ADVERTISING

Sabrina Singh, Harris' press secretary, condemned Perdue's statement.

"Well that is incredibly racist," she said on Twitter. "Vote him out and vote for @ossoff."

"Senator Perdue's intentionally disrespectful mispronunciation of Senator Harris's name is a bigoted and racist tactic straight from President Trump's handbook. He owes Georgians an apology for his offensive display," said Democratic Party of Georgia Chairwoman Nikema Williams.

A spokeswoman for Perdue's campaign defended his remarks in a statement to CNN.

"Senator Perdue simply mispronounced Senator Harris' name, and he didn't mean anything by it," said Casey Black. "He was making an argument against the radical socialist agenda that she and her endorsed candidate Jon Ossoff are pushing."

It's not the first time during this campaign that Perdue has been accused of discrimination against a Democrat. Perdue was criticized in June when his campaign was forced to pull a digital ad attacking Ossoff, which showed the Democrat's nose enlarged, a hallmark of an anti-Semitic trope. A campaign spokeswoman called the distorted image "accidental... but to ensure there is absolutely no confusion, we have immediately removed the image from Facebook." After that incident, a campaign spokeswoman said Perdue has a "strong and consistent record of standing firmly against anti-Semitism and all forms of hate" and co-sponsored a resolution in 2019 condemning anti-Semitism.

Republicans have frequently mispronounced the California senator's name, including President Donald Trump, who did so twice during a news conference on the day she was announced as Biden's running mate.

Fox News' Tucker Carlson lashed out at a guest in August after being corrected over the pronunciation of Harris' name.

"So I'm disrespecting her by mispronouncing her name unintentionally?" Carlson asked. "So it begins, you're not allowed to criticize Kuh-MAH-la Harris, or CA-muh-la, or whatever."

Kamala is pronounced "'comma-la,' like the punctuation mark," according to the California senator. Harris wrote in the preface of her 2019 memoir, "The Truths We Hold," "First, my name is pronounced 'comma-la,' like the punctuation mark. It means 'lotus flower,' which is a symbol of significance in Indian culture. A lotus grows underwater, its flower rising above the surface while its roots are planted firmly in the river bottom."

If elected in November, Harris will become the nation's first Indian-American vice president, the first Black vice president, the first female vice president and the first Jamaican-American vice president. Harris' father was born in Jamaica and her late mother was born in India.

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EXHIBIT 25



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Crime fears emerge in Johns Creek, Sandy Springs municipal elections



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John Spink / ajc.com

NORTH FULTON COUNTY

By **Adrianne Murchison**, The Atlanta Journal-Constitution

Oct 26, 2021

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Support for police and fears of rising crime have become dominant topics for candidates fighting to win office in two north Fulton cities. For several weeks, city council candidates in Johns Creek and Sandy Springs have pointed to Atlanta crime and protests that turned violent to try to sway voters.

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That Atlanta Journal-Constitution has reported that after a historically deadly 2020, Atlanta homicides are up nearly 60% in 2021.

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Now, north Fulton candidates in nonpartisan races are publicly urging residents to vote for them or risk seeing their cities becoming home to chaos and lawlessness.

The latest is a Sandy Springs flyer from the Fulton Republican Party stating, “We can’t let Sandy Springs turn into another Atlanta.” The flyer supports five candidates: Mayor Rusty Paul, Councilmembers John Paulson and Tibby DeJulio and council candidates Jeff Howe and

Melissa Mular. It displays photos of police standing in front of protesters along with shuttered and boarded up apartments.

Similar campaign material is circulating in Johns Creek. Mayoral candidate John Bradberry, who is supported by the Fulton GOP, said he believes a flyer that reads, "...Save Johns Creek from the partisan group targeting Johns Creek to radically change our quality of life" was created by a group of residents who don't want Democratic-aligned candidates taking over the city.

The flyers were distributed to voters throughout the north Fulton cities.

Emory University Political Scientist Dr. Andra Gillespie said the use of law and order on campaigns has long been interpreted by political scientists as a racial trope. The strategy is referred to as "code" or "dog whistles" that go back to Richard Nixon's 1968 presidential campaign and more recently the 2020 election, she said.

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"Law and order" is racially neutral, Gillespie said, but when it's infused with present-day cultural meaning and thoughts about crime and violence, it becomes racial.

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"Nixon knew he couldn't run on overtly racist language," she added. "But he could invoke the stereotype (of people of color) in a neutral way ...When people are referencing Atlanta directly - a city that is still majority African American, it's implicating White flight and it's hard to deny there are racial undertones."

The Atlanta Journal-Constitution

During the election season, Sandy Springs City Council candidates of color have described the campaign language by Republicans as racially charged, but Fulton County Republican Party Chairman Trey Kelly said he disagrees.

“My take on that is race has nothing to do with it,” Kelly said Tuesday. “That’s a narrative that the Democrats push regularly. People move to Sandy Springs and Johns Creek because they don’t want to be part of a big urban city run by Democrats that produce high taxes and high crime.”

Kelly said Atlanta is one such city.

He added that this year is the first time the Fulton GOP has distributed campaign materials supporting municipal candidates. The move was in response to the Fulton County Democrats party endorsing a group of candidates, he said.

Kelly forwarded a copy of a flyer produced by Fulton County Democrats endorsing mayoral candidate Dontaye Carter, and City Council candidates Megan Harris, Dr. Melody Kelley and Leslie Mullis.

The flyer reads, “It’s time for our city council to have members that represent all of us. The Fulton Democrats are endorsing these candidates based on their platform positions.”

Juliette Hartel, North Fulton district chair of the Fulton County Democratic Party, said the organization has endorsed individual candidates and connected them with volunteers and other people interested in their platforms. There is no coordinated effort to promote a slate of candidates as stated on the GOP flyer, she said.

“(The candidates) are not the same and you can tell that when you go to their websites,” Hartel said of the endorsed Democratic candidates. “If you watched the debates, their platforms are not the same.”

Lee Tucker, chairman of the Fulton County Democratic Party, is running for the Johns Creek City Council Post 1 seat. Hartel said Tucker is not involved in activities related to the Nov. 2 election or races and those duties are being managed by the party Vice Chairman Sean Calahan.

In Johns Creek, Bradberry said concerns about a rise in crime are not dog whistles.

“If (Democrats) talk of changing (the city) into something radically different from what people have come to know and love in Johns Creek, naturally there is going to be a reaction,” Bradberry said in reference to the “Save Johns Creek” flyer.

His opponent, Johns Creek mayoral candidate Brian Weaver, who is Black, said he believes the flyer is racially motivated.

“It’s unfortunate that some of these candidates are trying to divide the city,” Weaver said. “It’s sending a message that’s more divisive than inclusive.”

Weaver said false comments have been made by Johns Creek City Council candidate Bob Erramilli about his support for the police. Weaver is a retired senior commander with the Johns Creek Police Department and endorsed by the Fulton County Democratic Party.

Erramilli, who is of Indian descent, said during a call with the AJC that supporting police and preventing crime was central to his platform. He was critical of Weaver kneeling during a 2020 protest after the death of George Floyd. Weaver, who was serving on Johns Creek City Council at time, said he was attending one of the numerous protests held by local high school students and alongside him was a police officer. Other elected officials also attended the protest, he said.

“That triggered an alarm bell in me,” Erramilli said, of Weaver kneeling. “He can’t be taking a knee at an anti-police march ...That’s effectively saying, ‘I have no confidence in law enforcement to take care of my communities.’”

Weaver said the law and order conversation against candidates adds to the negative campaign tone in Johns Creek.

“What Bob said is totally irresponsible and disappointing,” Weaver said. “Me kneeling was not anything against the police. He’s out of touch and doesn’t understand.”

Hartel said candidates aligned with both parties have the same kind of support for police.

“I do know they all support police and public safety and want more funding,” Hartel said. “And that’s across the board for any candidate, Republican and Democrat.”

About the Author

The Atlanta
Journal-Constitution

Adrianne Murchison

Adrianne Murchison covers local government in north Fulton County for The Atlanta Journal-Constitution.

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EXHIBIT 26

H. Res. 72

In the House of Representatives, U. S.,

February 4, 2021.

Whereas clause 1 of rule XXIII of the Rules of the House of Representatives provides, “A Member, Delegate, Resident Commissioner, officer, or employee of the House shall behave at all times in a manner that shall reflect creditably on the House.”; and

Whereas Representative Marjorie Taylor Greene should be removed from her committee assignments in light of conduct she has exhibited: Now, therefore, be it

Resolved, That the following named Member be, and is hereby, removed from the following standing committees of the House of Representatives:

COMMITTEE ON THE BUDGET: Mrs. Greene of Georgia.

COMMITTEE ON EDUCATION AND LABOR: Mrs. Greene of Georgia.

Attest:

Clerk.

EXHIBIT 27



H.Res.72 - Removing a certain Member from certain standing committees of the House of Representatives.

117th Congress (2021-2022)

Sponsor: [Rep. Wasserman Schultz, Debbie \[D-FL-23\]](#) (Introduced 02/01/2021)

Committees: House - Ethics

Latest Action: House - 02/04/2021 Motion to reconsider laid on the table Agreed to without objection. ([All Actions](#))

Roll Call Votes: There has been [1 roll call vote](#)

Tracker:

Introduced

Agreed to in House

Summary(2) Text(2) Actions(10) Titles(1) Amendments(0) Cosponsors(45) Committees(1) Related Bills(1)



There are 2 summaries for H.Res.72.

Passed House (02/04/2021)



[Bill summaries](#) are authored by [CRS](#).

Shown Here:

Passed House (02/04/2021)

This resolution removes Representative Marjorie Taylor Greene from the House Committee on the Budget and the House Committee on Education and Labor.