

**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

DEFENDANTS’ STATEMENT OF UNDISPUTED MATERIAL FACTS

Defendants Brad Raffensperger, in his official capacity as Secretary of State; and State Election Board Members William S. Duffey, Sara Tindall Ghazal, Janice Johnston, Edward Lindsey, and Matthew Mashburn, also in their official capacities (collectively, “Defendants”) pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.1 submit this Statement of Material Facts as to Which There is No Genuine Issue to be Tried.

1. Census data showed that the increase in the percentage of Black voters in Georgia from 2010 to 2020 was slightly more than two percentage points statewide. Report of William Cooper, attached as Ex. A (“Cooper Report”), ¶ 14, Figure 1.

2. Other Census data has shown decreases in the Black Citizen Voting Age Population between 2019 and 2021. Deposition of William Cooper [Doc. 167] (“Cooper Dep.”) 38:24-39:10.

3. Both chairs of the House and Senate committees with jurisdiction over redistricting sought to meet with all of their colleagues, both Republican and Democratic, to gain input on their areas of the state. Deposition of Gina Wright [Doc. 170] (“Wright Dep.”) 68:17-69:7.

4. Consistent with past redistricting cycles, the joint House and Senate committees also held a series of “listening sessions” across the state to hear from citizens about maps, including several Zoom meetings. Deposition of Sen. John Kennedy [Doc. 171] (“Kennedy Dep.”) 171:13-20, 194:1-195:10.

5. And for the first time in 2021, the General Assembly provided a public comment portal online, seeking comments from the public. Wright Dep. 252:20-253:4.

6. After holding a committee education day where a variety of stakeholder groups presented about map-drawing, the committees adopted guidelines to govern the map-drawing process. Kennedy Dep. 161:1-4; Deposition of Bonnie Rich [Doc. 172] (“Rich Dep.”) 214:19-215:7.

7. To prepare maps, Gina Wright, the director of the Joint Reapportionment Office, worked with a leadership group to work on the

congressional map from an earlier draft from Sen. Kennedy. Wright Dep. 28:19-30:23.

8. Political considerations were important, including placing portions of Cobb County into District 14 to increase political performance in other parts of the state. Wright Dep. 111:16-112:10; 158:4-21.

9. The resulting Congressional map reduced the number of split counties from the prior plan. Cooper Report, ¶ 81, Figure 14.

10. The Governor signed the plan on December 30, 2021, and it was used in the 2022 elections. Amended Complaint [Doc. 120], ¶ 33.

11. The only material fact regarding the role of the State Election Board (SEB) is what the SEB said in its responses to interrogatories, that they “were not involved in the map-drawing process.” Responses to Interrogatories, attached as Ex. B, Response No. 2.

12. Triana Arnold James (“James”) resided in Villa Rica, Georgia, at the time of the filing of the initial Complaint in *Pendergrass* on December 30, 2021. Deposition of Triana Arnold James [Doc. 160] (“James Dep.”) at 14:10-18.

13. James is registered to vote in Douglas County, Georgia. *Id.* at 37:5-8.

14. James considers herself to be a member of the Democratic Party. *Id.* at 38:20-22.

15. In 2018, James ran for Lieutenant Governor in the Democratic primary, but she did not receive the nomination. *Id.* at 41:9-18.

16. In “2020/2021,” James ran for State Senate in the Democratic primary for Senate District 30, but she did not receive the nomination. *Id.* at 40:20-41:8.

17. Coakley Pendergrass (“Pendergrass”) resided in Marietta, Georgia, at the time of the filing of the initial Complaint in *Pendergrass* on December 30, 2021. Deposition of Coakley Pendergrass [Doc. 159] (“Pendergrass Deposition”) at 11:21-12:3.

18. Pendergrass is a member of the Democratic Party. *Id.* at 25:17-19.

19. Pendergrass was a state committee member for the Democratic Party from 2016-22. *Id.* at 26:4-5, 9-15.

20. Pendergrass was vice president of the Cobb County Democratic Committee from 2011-21. *Id.* at 26:5-6, 26:21-27:8.

21. Pendergrass was vice president of the Democratic Party of Georgia’s African-American Caucus from 2011-15. *Id.* at 26:6-8, 27:20-25.

22. Pendergrass has participated in voter registration drives for the Democratic Party at the local and state levels. *Id.* at 28:4-12.

23. Pendergrass has supported local Democratic candidates in Cobb County through volunteering or donations. *Id.* at 30:3-17.

24. Plaintiff Elliott Hennington has resided in Powder Springs, Georgia in Cobb County, Georgia since 2004. Deposition of Plaintiff Elliott Hennington [Doc. 164] (“Hennington Dep.”) at 16:19-17:9.

25. Hennington has considered himself to be a member of the Democratic Party since the 1980’s. *Id.* at 36:23-37:9.

26. During the time that he has been a member of the Democratic Party, Hennington’s activities for the Democratic Party have included volunteering on political campaigns for Democratic Party candidates. *Id.* at 39:5.

27. According to Hennington, he has never considered himself a member of the Republican Party, and to his knowledge has never voted for a Republican Party candidate. *Id.* at 37:20-38:7.

28. Robert Richards has lived in Powder Springs, Cobb County, Georgia since 2016. Deposition of Robert Richards [Doc. 161] (“Richards Dep.”) at 21:13-25.

29. Richards is a member of the Democratic Party. *Id.* at 44:21-23.

30. Plaintiff Jens Rueckert has resided in Powder Springs, Georgia in Cobb County since 2014. Deposition of Plaintiff Jens Rueckert [Doc. 162] (“Rueckert Dep.”) at 14:13-18:2.

31. Mr. Rueckert has considered himself to be a member of the Democratic Party since he has been old enough to vote. *Id.* at 29:7-13.

32. Mr. Rueckert does not recall ever voting for a member of the Republican Party in an election. *Id.* at 30:20-23.

33. O’Juan Glaze lives in, Marietta, Cobb County, Georgia. Deposition of O’Juan Glaze [Doc. 163] (“Glaze Dep.”) at 11:16-17.

34. Mr. Glaze identifies as a member of the Democratic Party. *Id.* at 33:9-11.

35. Mr. Glaze has voted for members of the Republican Party when there were no Democrat candidates on the ballot in that election. *Id.* at 34:10-25.

36. Plaintiffs began planning for this litigation before the Georgia maps were even complete—retaining experts to work on alternative maps around the same time as the special session convened. Cooper Dep. 8:14-23.

37. Plaintiffs' goal in offering their illustrative plans was to determine whether they could draw one additional majority-Black district beyond those drawn by the state plans. Cooper Dep. 14:15-15:2.

38. Map-drawers distinguish "majority-minority" from "majority-Black." Majority-minority districts have a majority of non-white and Latino voters, while majority-Black districts are districts where Black voters as a single racial category constitute a majority of a district. Cooper Dep. 16:14-20.

39. Five of Georgia's fourteen members of Congress are Black individuals. Cooper Dep. 19:19-21.

40. When Mr. Cooper was creating his illustrative maps, he turned on features in the software to indicate where Black individuals were located. Cooper 24:12-25:6.

41. Unlike the legislature, Mr. Cooper did not have any political data available to him. Wright Dep. 55:25-56:7; 140:3-11; 140:17-19; 257:21-258:1; 258:2-14; Cooper Dep. 56:8-11.

42. Mr. Cooper's preliminary injunction plans contained the maximum number of Black districts he drew for any congressional plan in Georgia. Cooper Dep. 14:15-15:2.

43. Mr. Cooper created one additional majority-Black congressional district on his illustrative plan, which is titled District 6. Cooper Report, ¶ 53.

44. Five years ago, in a different Section 2 case challenging Georgia congressional districts, Mr. Cooper analyzed a south Georgia area to create a majority-Black district in rural Georgia. Cooper Dep. 42:10-42:18, 43:4-13.

45. Despite relying on the existence of four state Senate districts in the same area, Cooper Report, ¶ 45, large geographic areas of Senate Districts 39 and 38 in Fulton County were not included in illustrative District 6. Cooper Dep. 49:5-49:15.

46. Unlike Mr. Cooper's preliminary injunction plan, Cobb County is split three ways in the plan he submitted with his expert report. Cooper Dep., 51:3-6.

47. To create the one additional majority-Black district, Mr. Cooper had to alter eight of the existing 14 congressional districts, but avoided altering Districts 2, 5, and 7, all of which currently elect Black Democratic members of Congress. Cooper Report, ¶ 51; Cooper Dep. 36:5-36:14.

48. In illustrative District 6, the only portion of a county in the district that is majority-Black in voting age population is Fulton County. Cooper Dep. 77:12-17.

49. Without the portion of Fulton that Mr. Cooper moved out of District 13 into illustrative District 6, the remaining components of the district would not allow it to be majority-Black. Cooper Dep. 78:6-11.

50. Mr. Cooper connected urban areas in North Fulton with rural areas in Bartow County. Cooper Dep. 59:6-60:1.

51. Mr. Cooper connected Cobb County with rural parts of Georgia going all the way down to Columbus, Georgia in District 3. Cooper Dep. 63:15-24, 64:17-65:4.

52. The only connection Mr. Cooper could identify to this similar configuration of enacted District 14 was that Heard and Troup counties were closer to Atlanta. Cooper Dep. 65:20-66:2.

53. Mr. Cooper agreed that his illustrative 13 connected urban (and heavily Black) parts of Clayton County with rural areas out to Jasper County. Cooper Dep. 73:13-17.

54. Mr. Cooper only identified population equality as the reason why he connected majority-Black Hancock County (from the Black Belt, according to his testimony in other cases) to the North Carolina border. Cooper Dep. 68:6-69:2, 70:16-22; 86:5-8.

55. Mr. Cooper also could not explain why he included Athens/Clarke County in the same district as Hancock County and Rabun County. Cooper Dep. 71:21-72:11

56. Mr. Cooper could identify practically nothing beyond the race of the voters in a number of his districts that united them. Cooper Dep. 68:6-69:2, 70:16-22, 73:13-17, 86:5-8.

57. Dr. Palmer did not review any primary results in his report. Deposition of Maxwell Palmer [Doc. 168] (“Palmer Dep.”) at 59:23-60:01; Deposition of John Alford [Doc. 158] (“Alford Dep.”) 29:07-30:01.

58. Dr. Palmer’s data only demonstrates two things: The race of the candidate *does not* change voting behavior of Georgia voters; and the party of the candidate *does*. Alford Dep. 54:18-22.

59. In the 2022 election cycle, the 2021 congressional plan elected five Black Democratic candidates to the 14 congressional districts. Cooper Dep. 19:19-21.

60. The Any-Part Black VAP for Georgia as a whole is 31.73%, and the 2021 AP Black CVAP is 33.3%. Cooper Report, ¶ 18, Figure 2.

61. Georgia’s U.S. senators are Black-preferred candidates because they are Democrats (Sen. Ossoff was elected in 2021 and Sen. Warnock was re-elected in 2022). Palmer Dep. 53:2-54:2.

Respectfully submitted this 20th day of March, 2023.

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing Statement has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan P. Tyson

Bryan P. Tyson

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
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COAKLEY PENDERGRASS et al.,

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v.

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

Defendants.

CIVIL ACTION FILE

NO. 1:21-CV-05339-SCJ

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

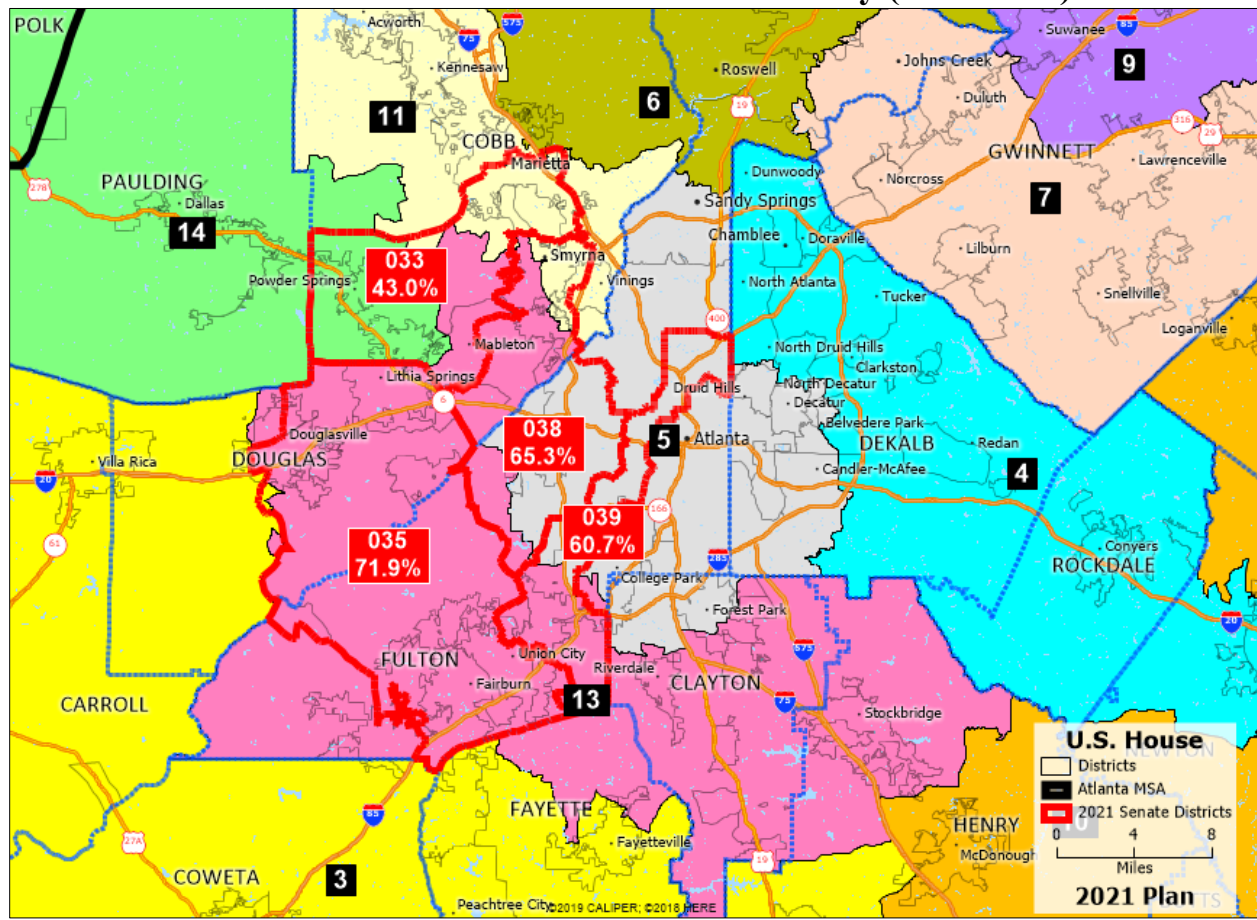
impact on compactness and fewer splits of political subdivisions (i.e., counties, VTDs, and municipalities).

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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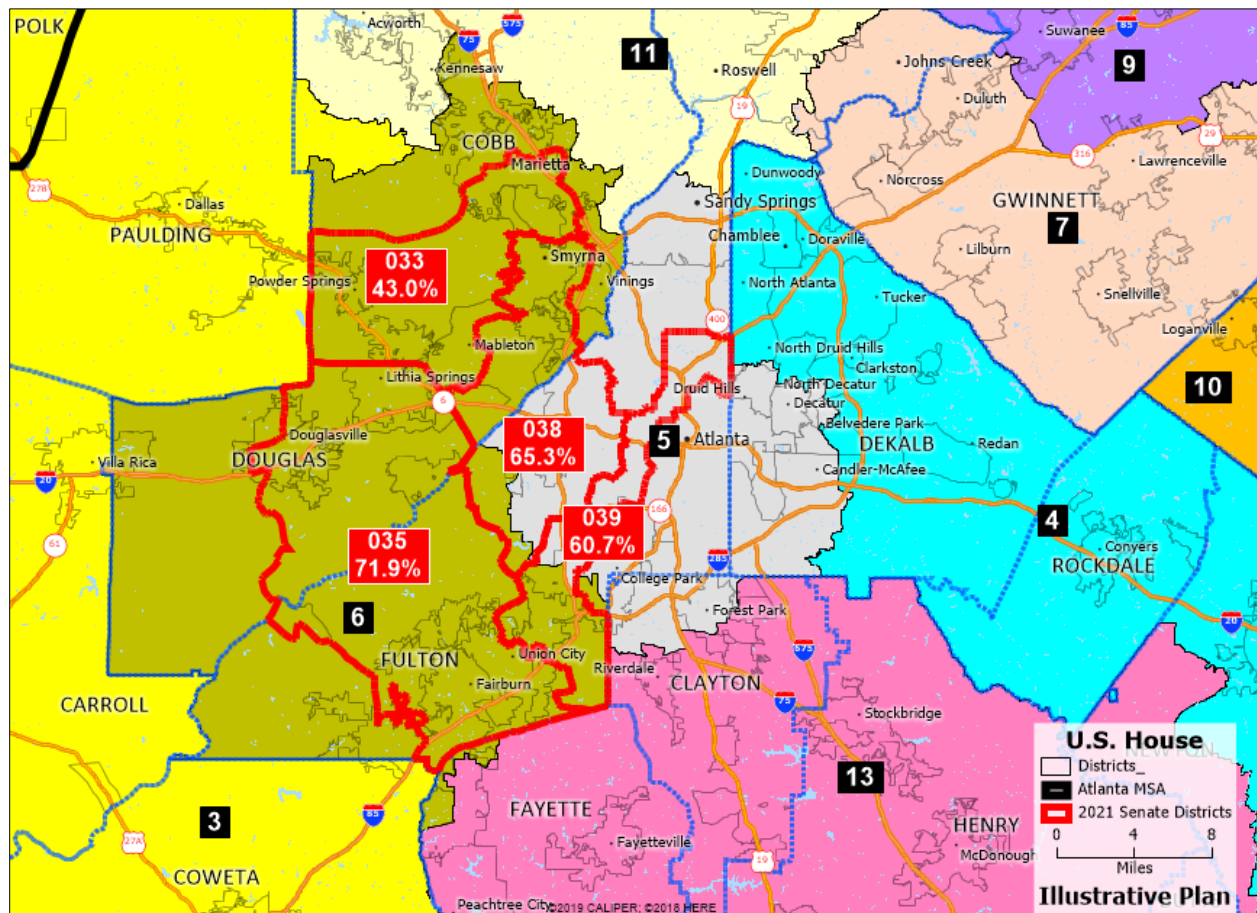
45. With respect to ideal district population size, four Senate districts are exactly the equivalent of one congressional district, given that 56 (the number of Senate districts) divided by 14 (the number of congressional districts) equals four. And, as shown in **Figure 9** below, there is ample room 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

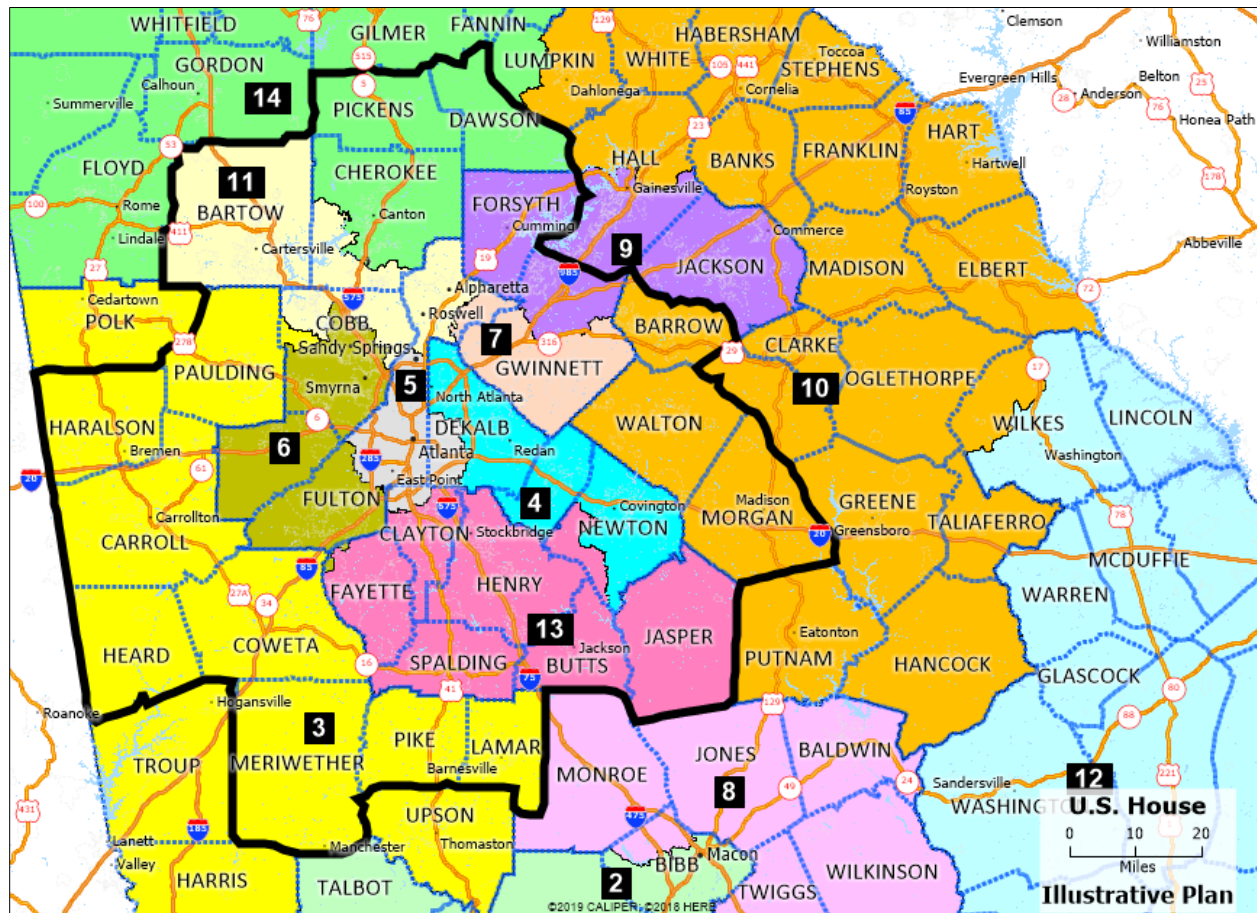
District	Population	Deviation	AP Black	% AP Black	Latino	% Latino	NH White	% NH White
1	765,137	1	230,783	30.16%	59,328	7.75%	440,636	57.59%
2	765,137	1	393,195	51.39%	45,499	5.95%	305,611	39.94%
3	765,135	-1	166,096	21.71%	49,935	6.53%	517,659	67.66%
4	765,136	0	410,019	53.59%	87,756	11.47%	212,004	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.

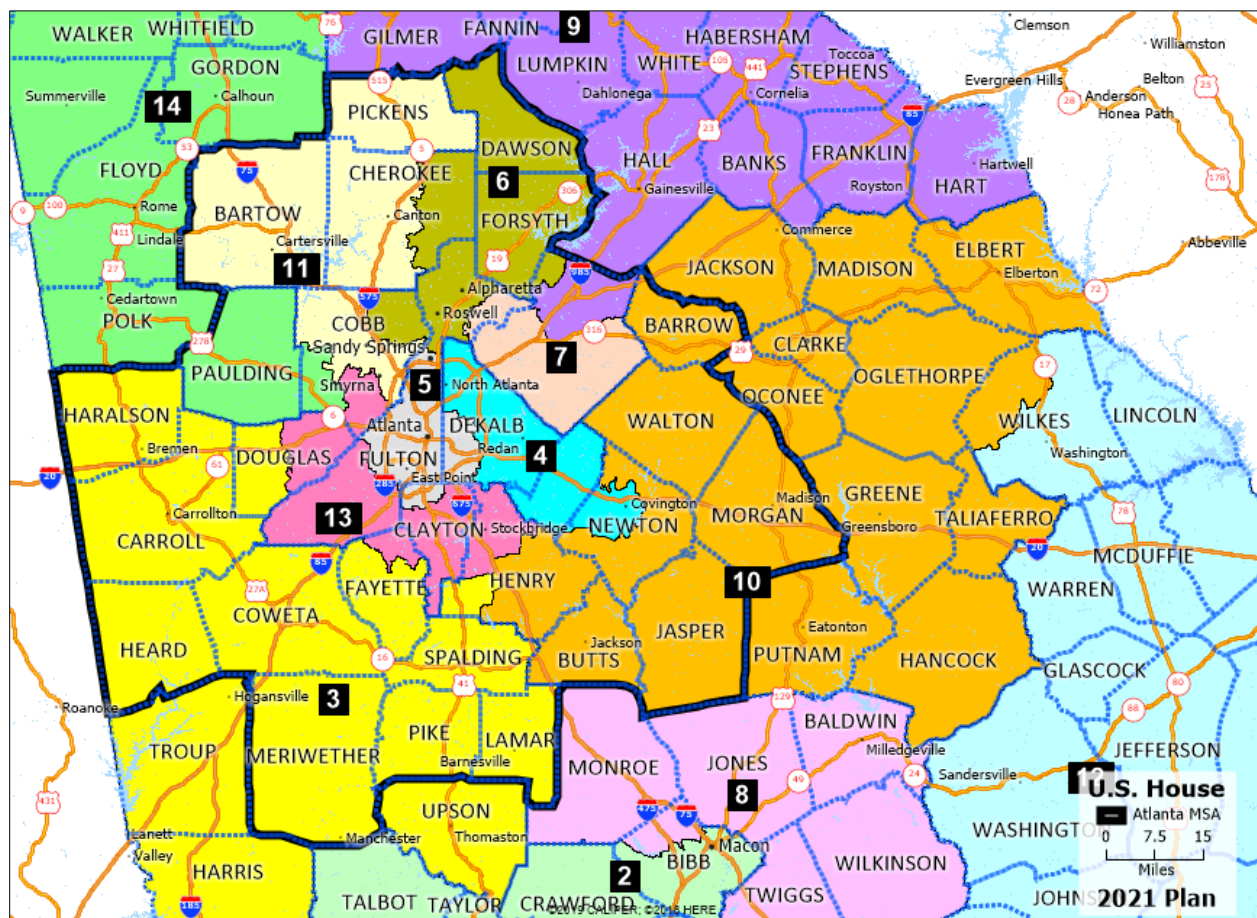
59. **Exhibit I-3** details district assignments by county population in the Illustrative Plan.

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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=04000000US13,13%240500000_05000000US13067,13089,13121,13135_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

#

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

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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.

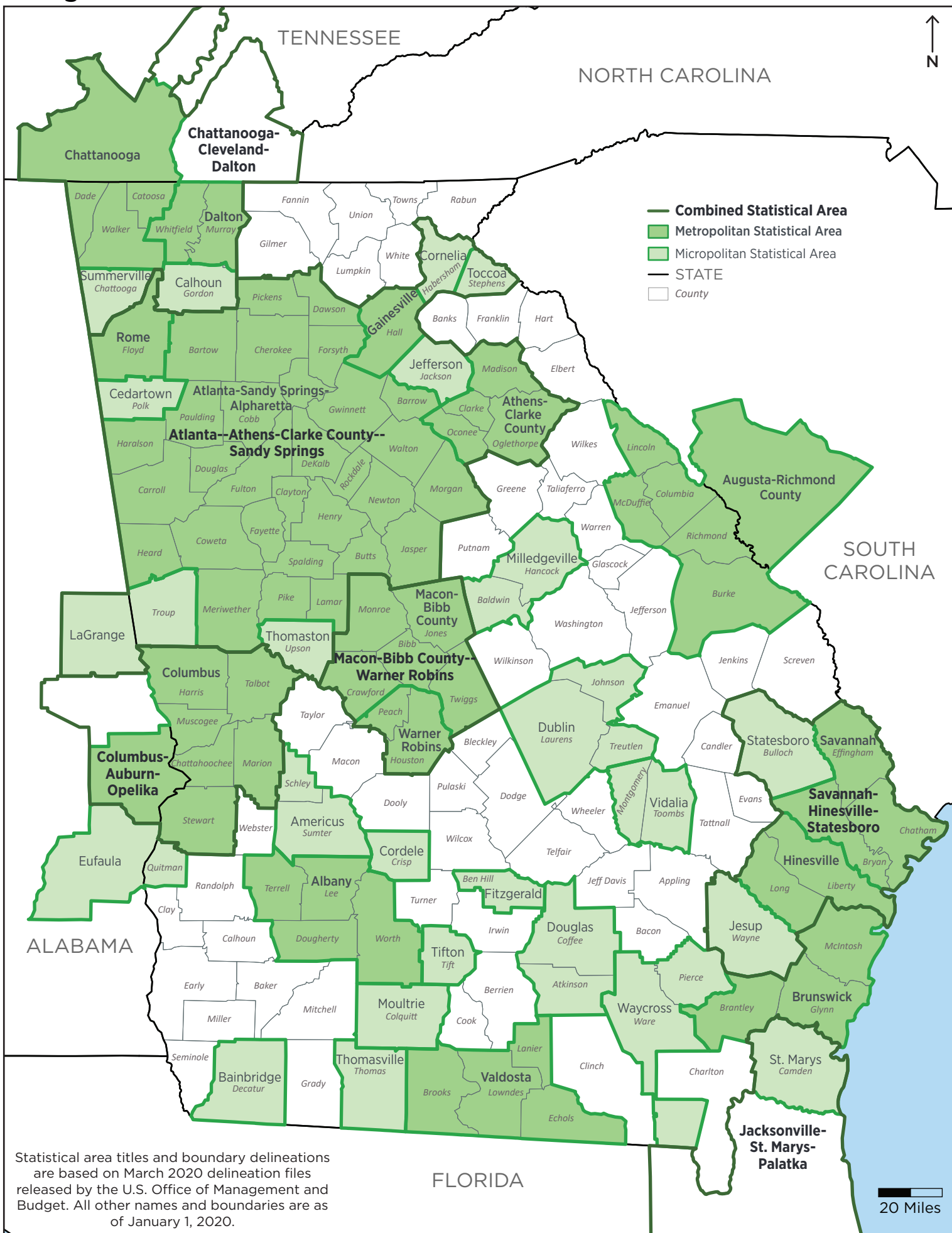
10. I also reviewed and used data from the American Community Survey ("ACS") conducted by the Census Bureau – specifically, the 1-year 2021 ACS, the 5-year 2015-2019 ACS, and the 5-year 2016-2020 ACS Special Tabulation of citizen population and voting age population by race and ethnicity (prepared by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

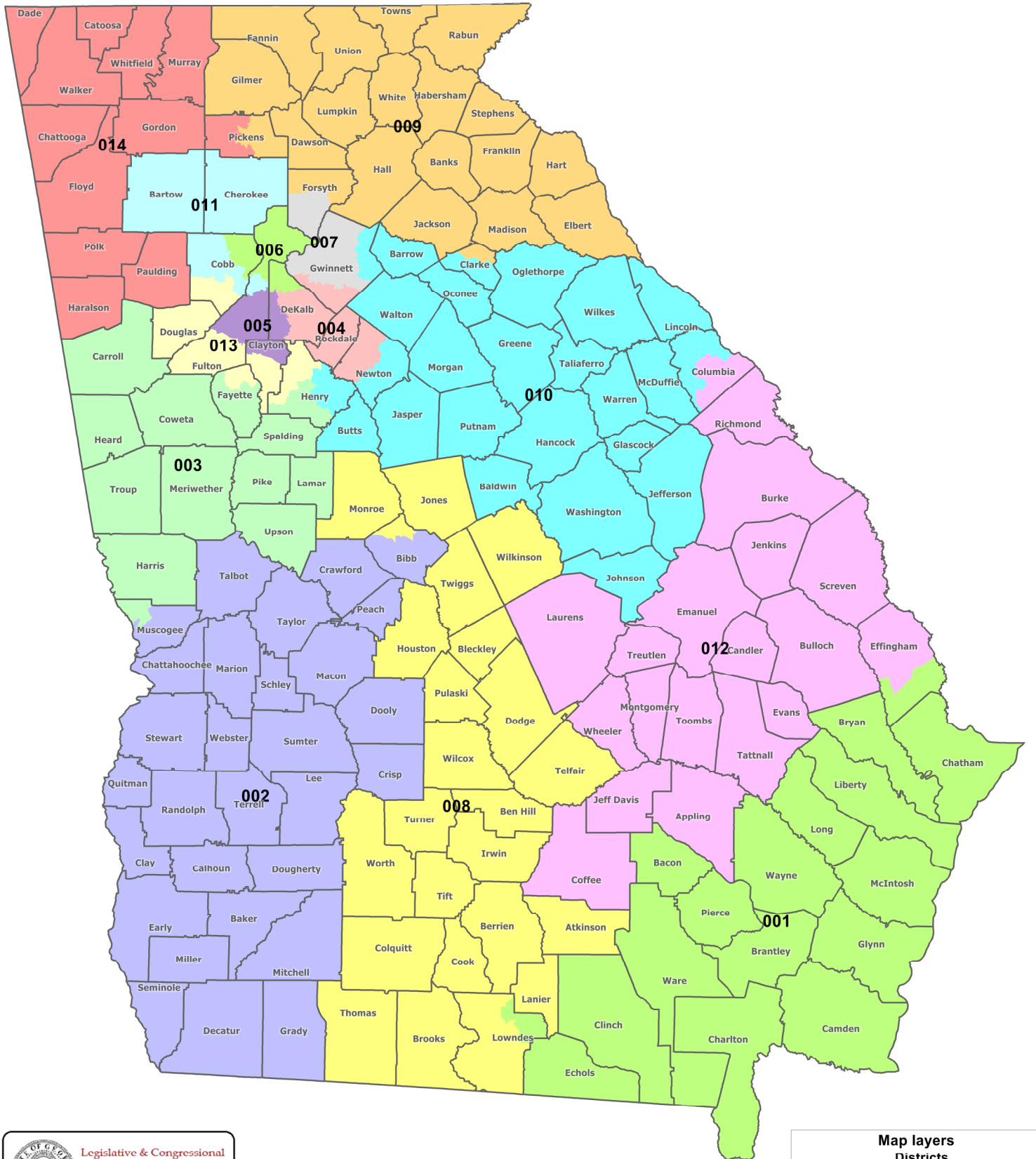
2010 -2020 Change

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%

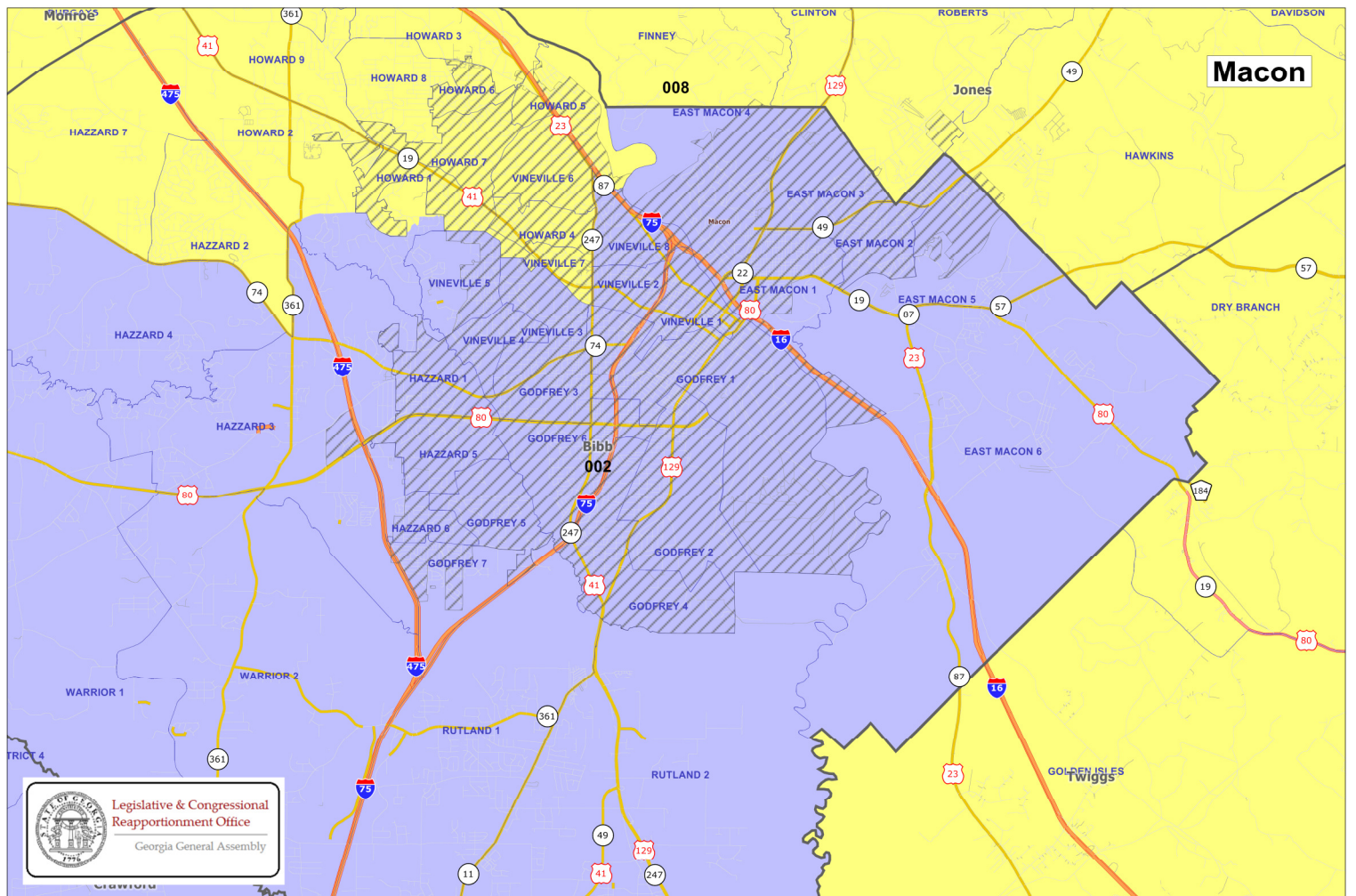
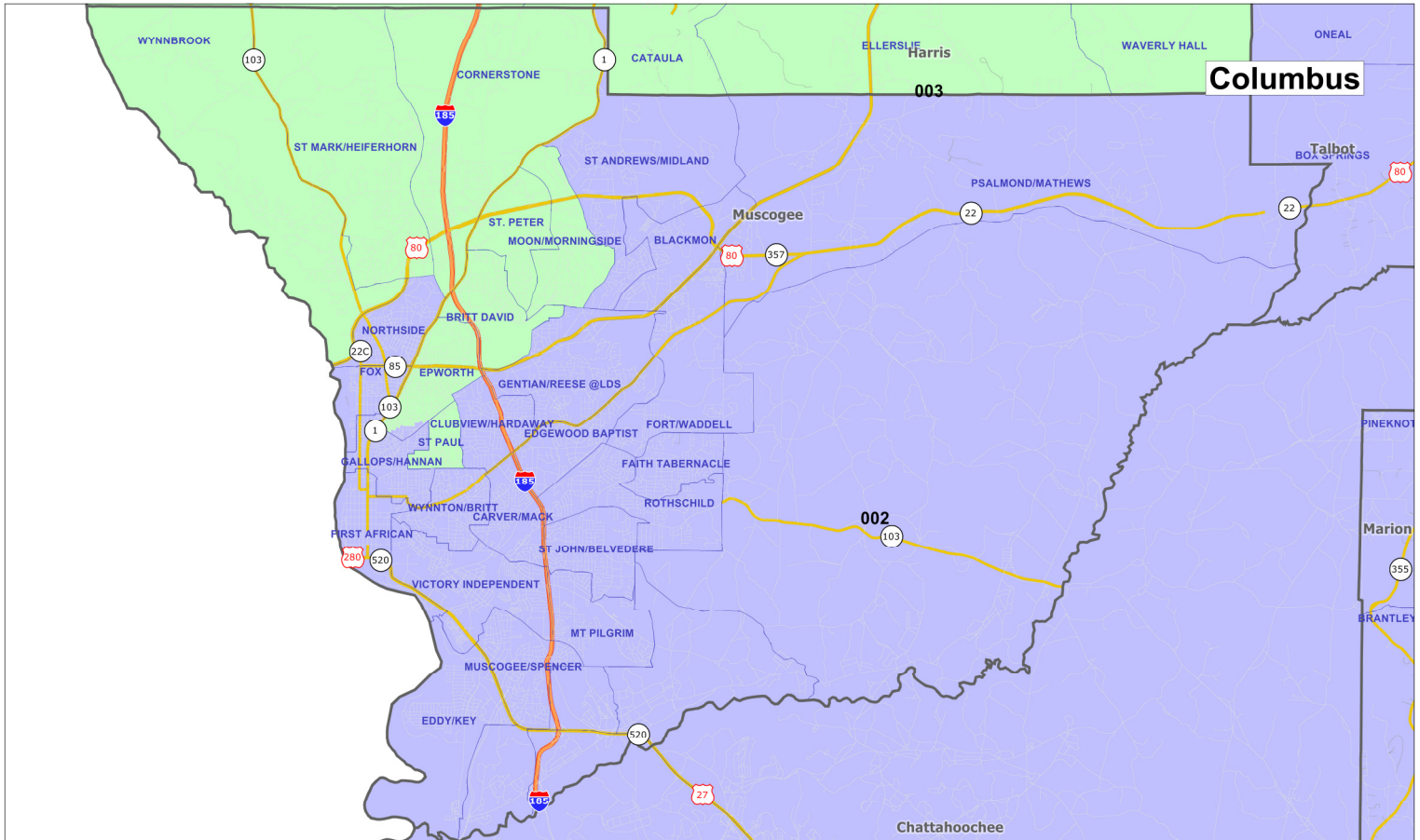
DECLARATION OF WILLIAM S. COOPER:
EXHIBIT E

Georgia Congressional Districts

Client: State
Plan: Congress12
Type: Congress



[illegible]

Georgia Congressional Districts

Legislative & Congressional
Reapportionment Office
Georgia General Assembly

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%

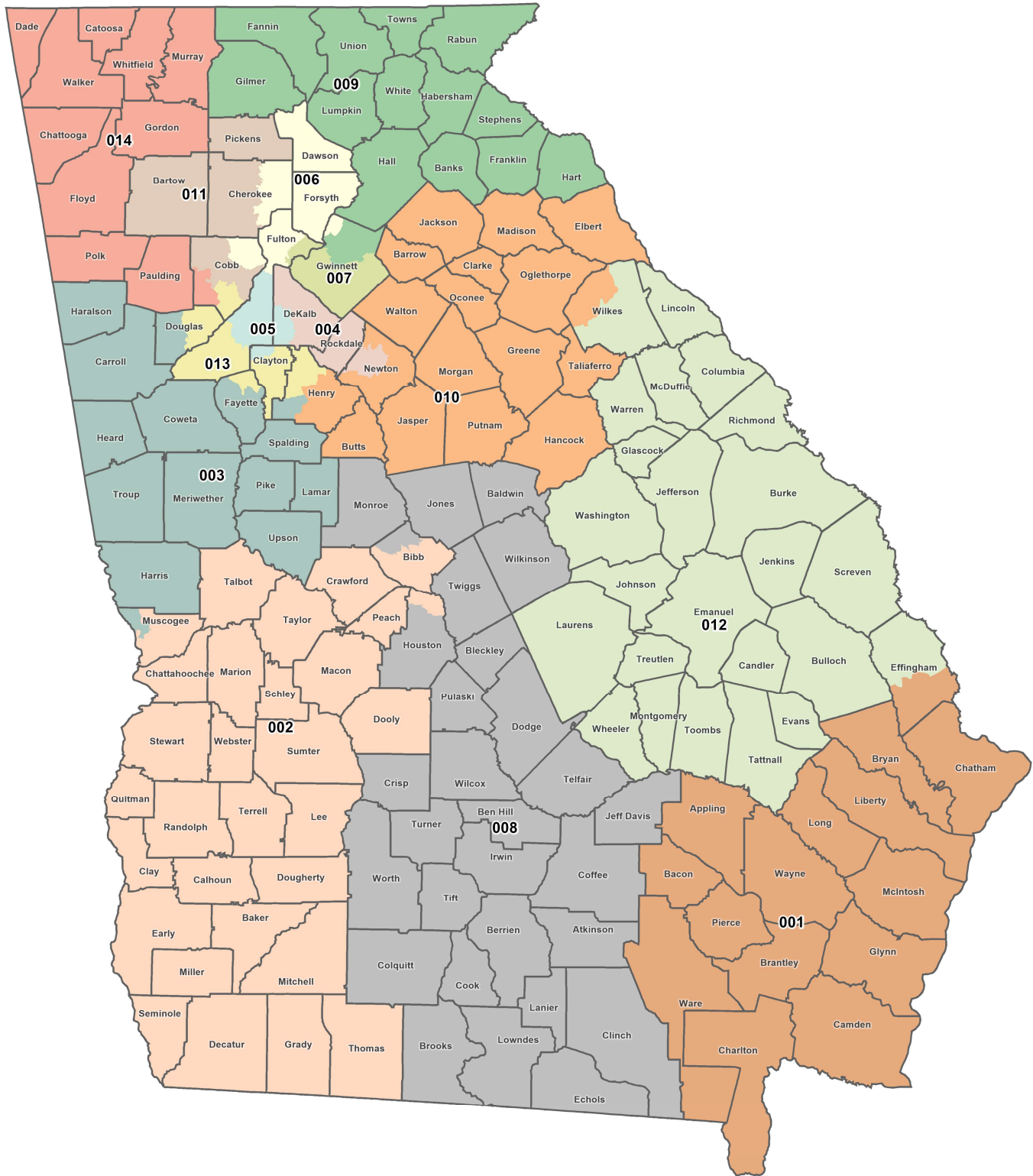
District	% NH Single-Race Black CVAP*	% Latino CVAP	% NH Single-Race Asian CVAP*	% SR NH White CVAP
001	30.09%	4.47%	1.55%	62.88%
002	51.78%	2.96%	1.00%	43.47%
003	24.88%	3.61%	1.60%	69.06%
004	63.91%	3.95%	3.45%	27.85%
005	59.21%	3.50%	3.41%	33.18%
006	15.20%	5.78%	8.07%	70.14%
007	22.46%	9.90%	11.84%	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

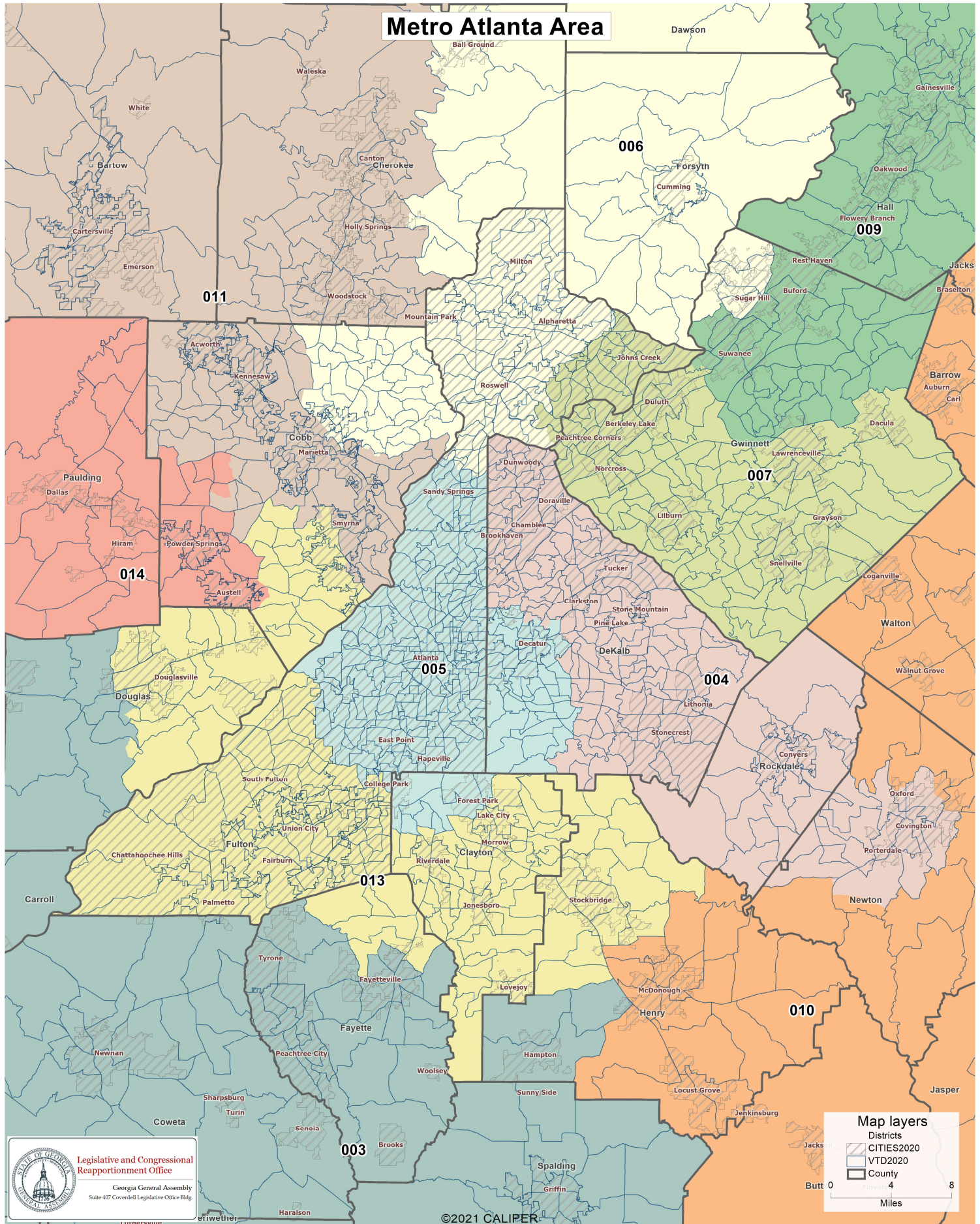
Districts



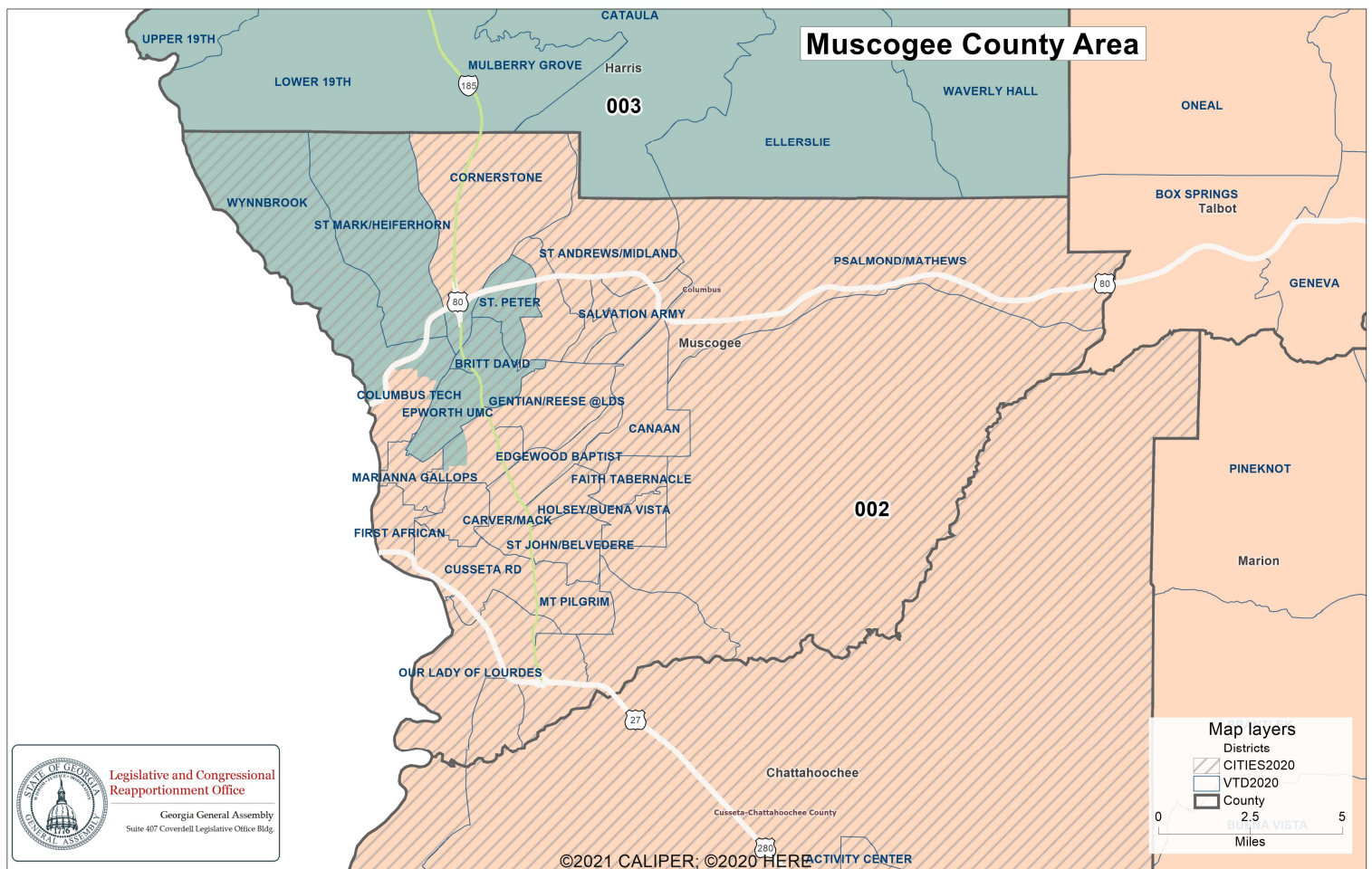
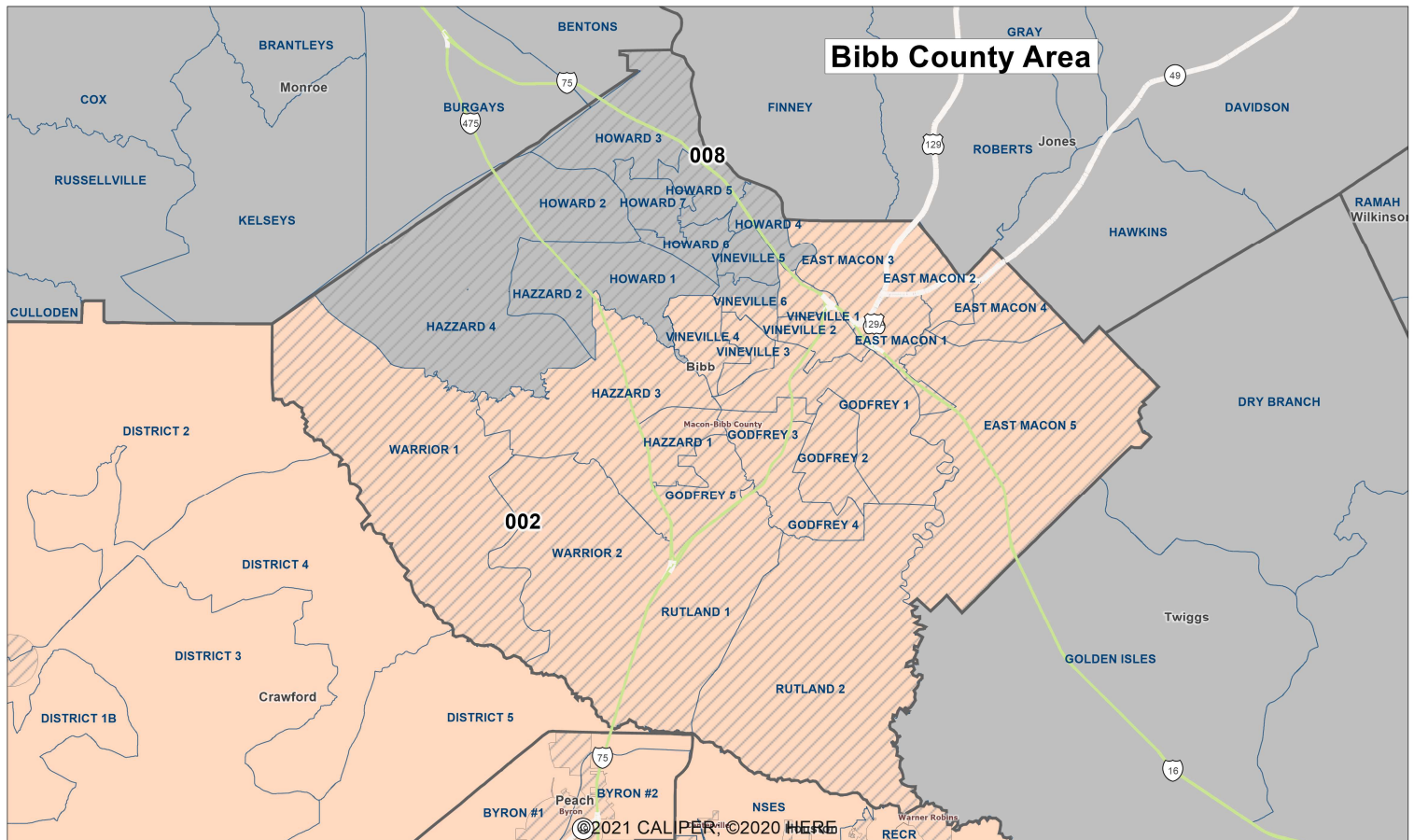
County

0 20 40
Miles

Proposed Joint Congressional Districts of Georgia



Proposed Joint Congressional Districts of Georgia

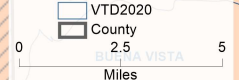


Legislative and Congressional
Reapportionment Office

Georgia General Assembly
Suite 407 Cowdell Legislative Office Bldg.

Map layers

Districts
CITIES2020
VTD2020
County



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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:

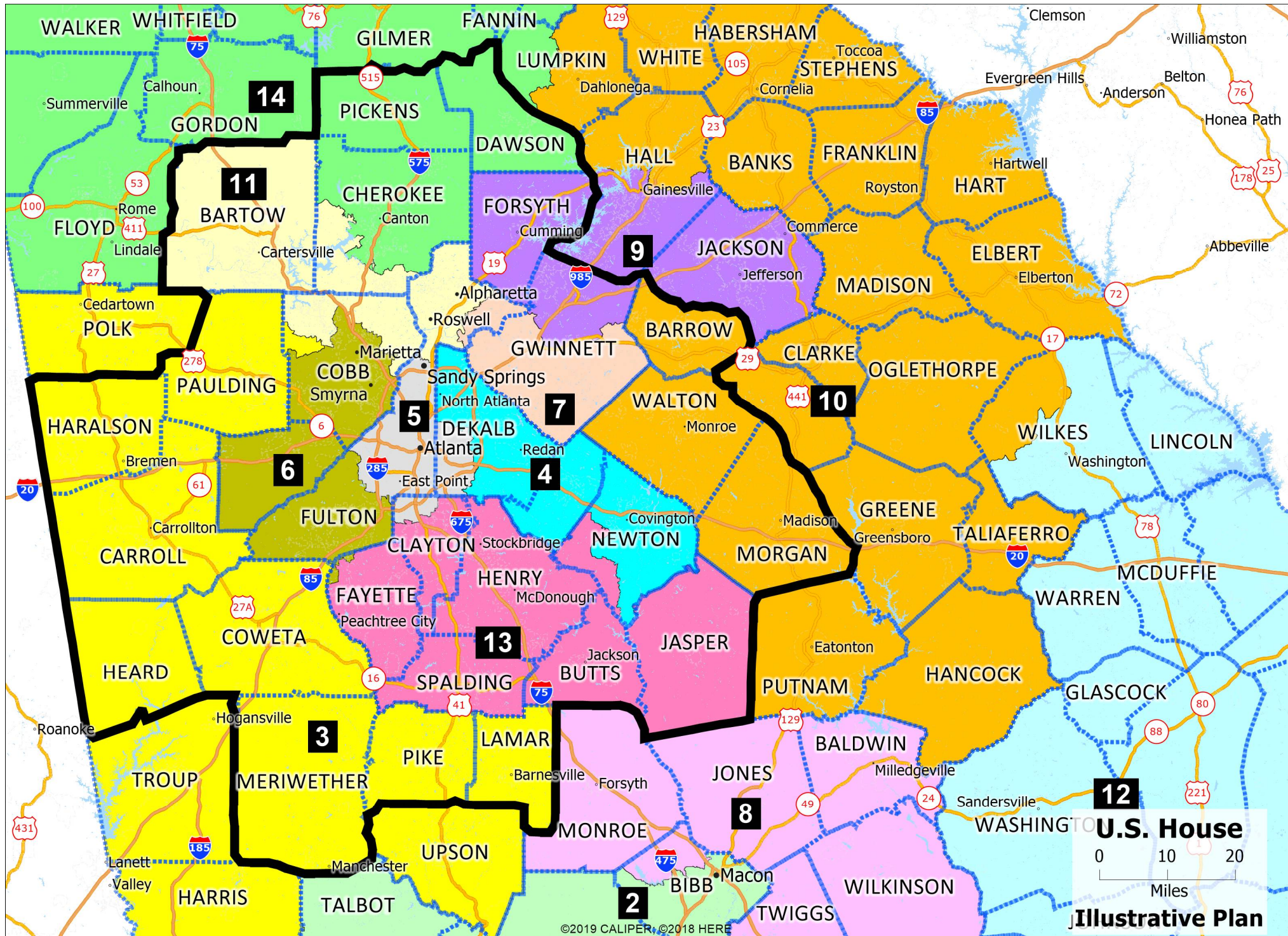
Population Range:	765,135 to 765,137
Ratio Range:	0.00
Absolute Range:	-1 to 1
Absolute Overall Range:	2
Relative Range:	0.00% to 0.00%
Relative Overall Range:	0.00%
Absolute Mean Deviation:	0.71
Relative Mean Deviation:	0.00%
Standard Deviation:	0.80

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%

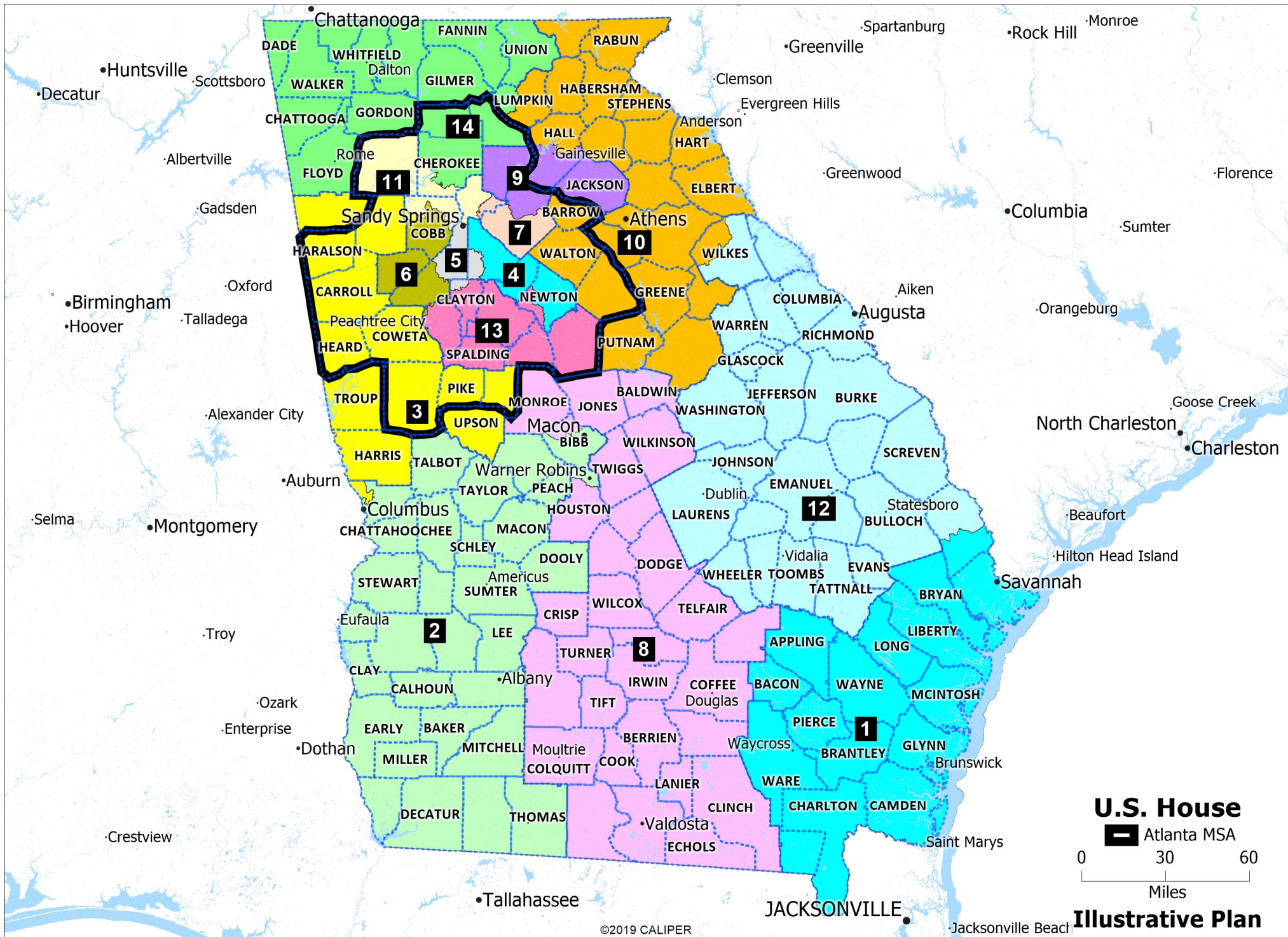
Total: 10,711,908

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%

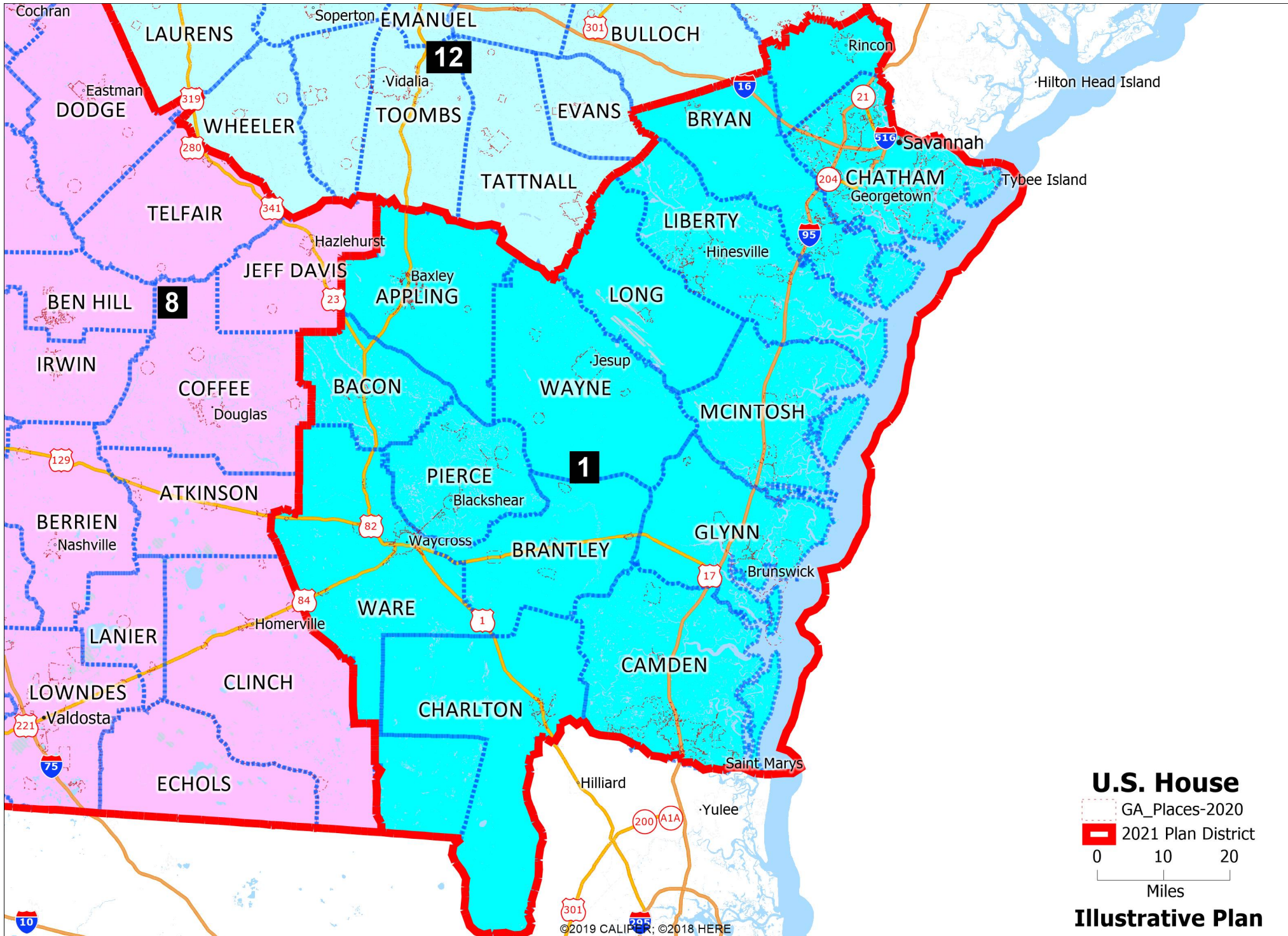
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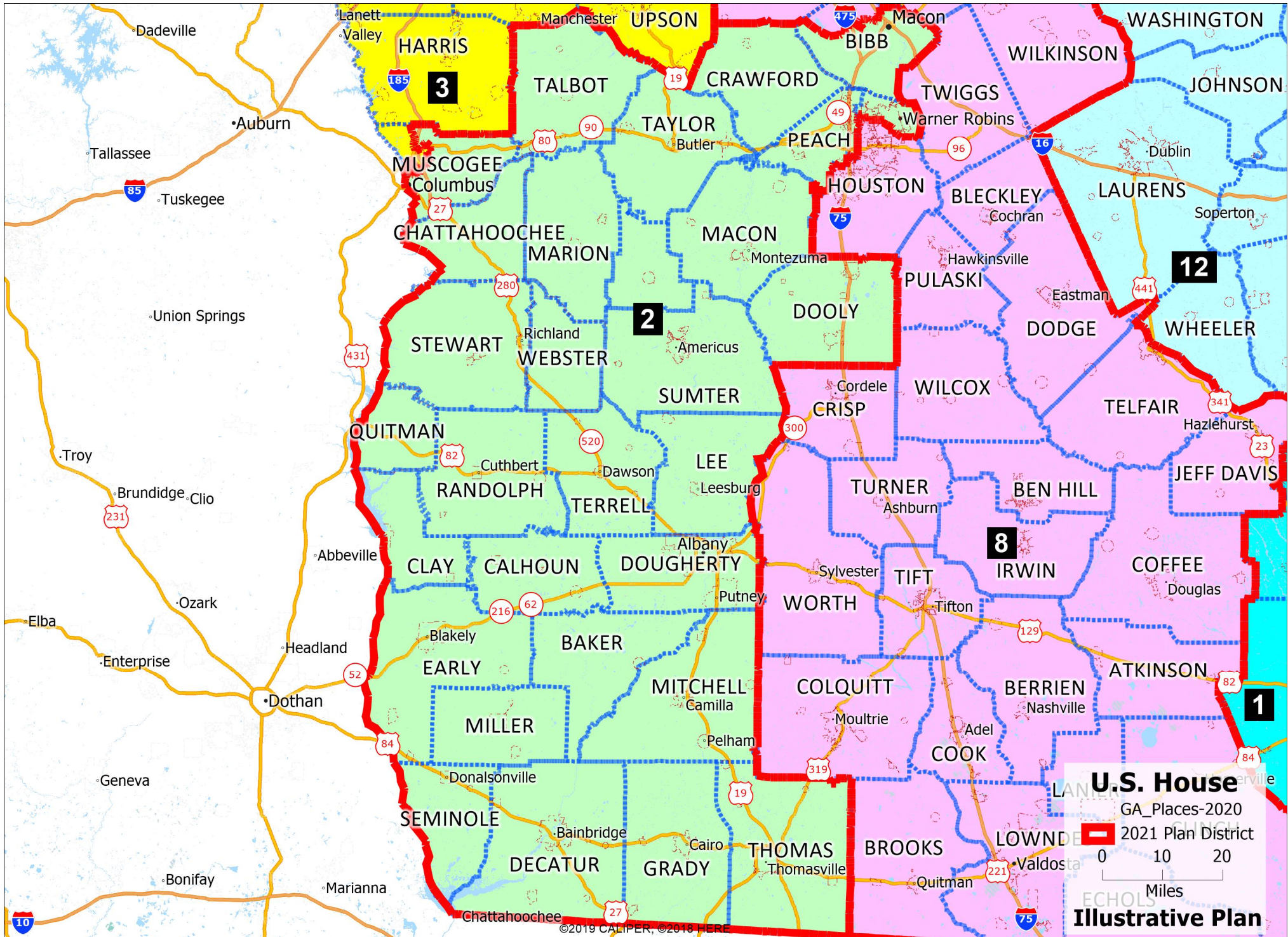
* 2016-20 ACS Special Tabulation <https://redistrictingdatahub.org/dataset/georgia-cvap-data-disaggregated-to-the-block-level-2020/>

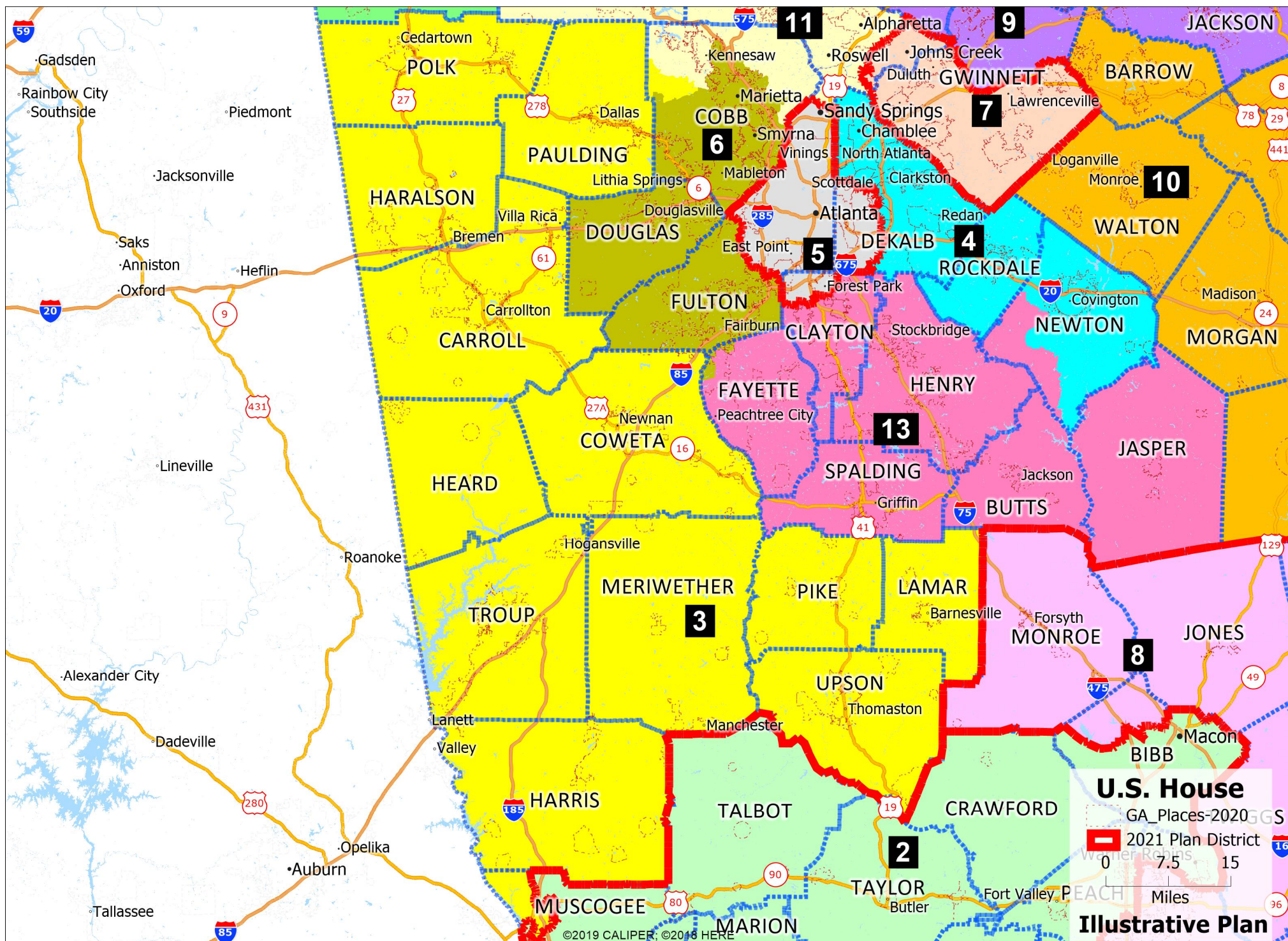
Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates

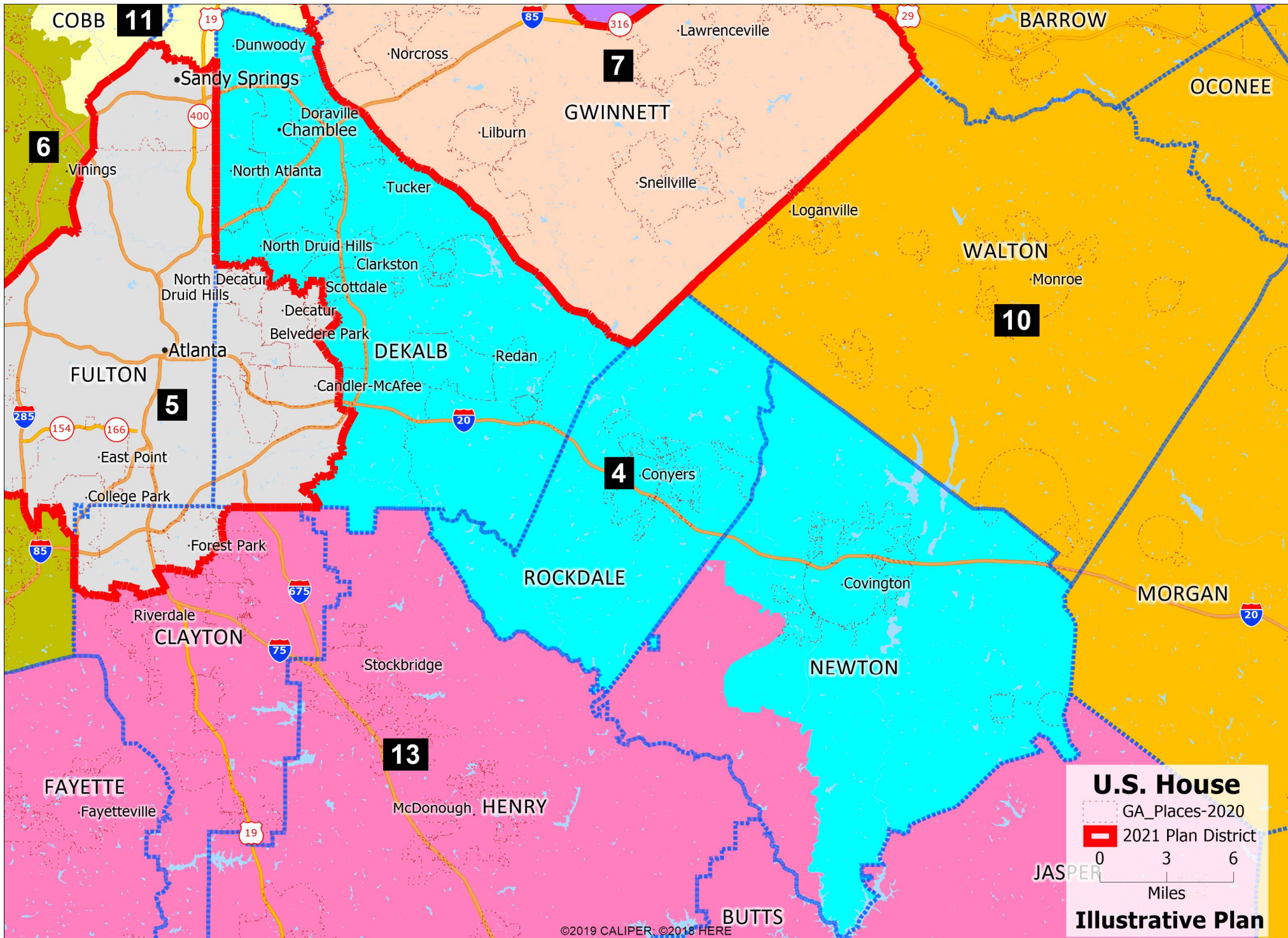
* Single race NH Black CVAP, **NH DOJ Black= SR NH Black CVAP+SR NH Black/White CVAP

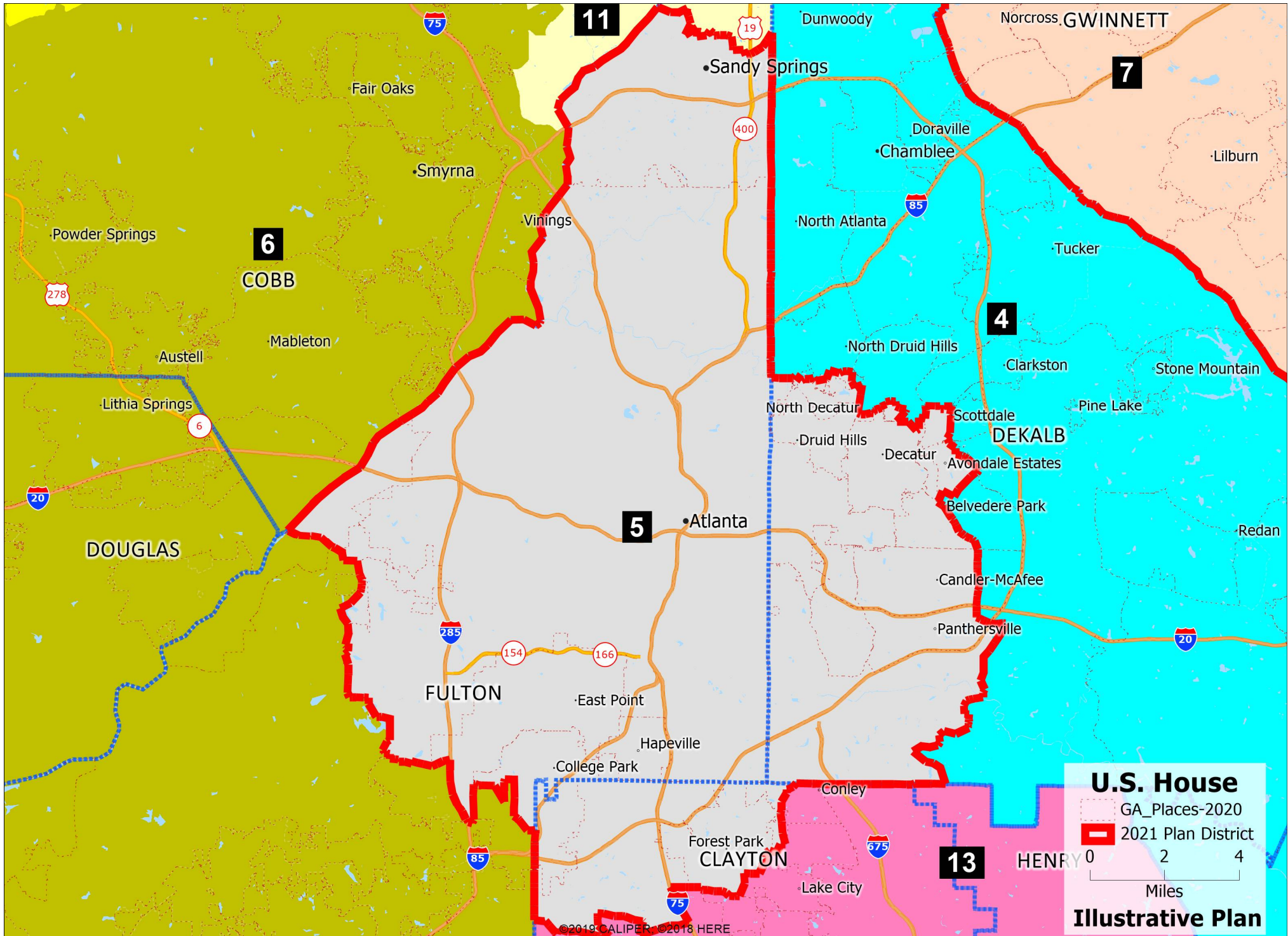
DECLARATION OF WILLIAM S. COOPER:
EXHIBIT I-2

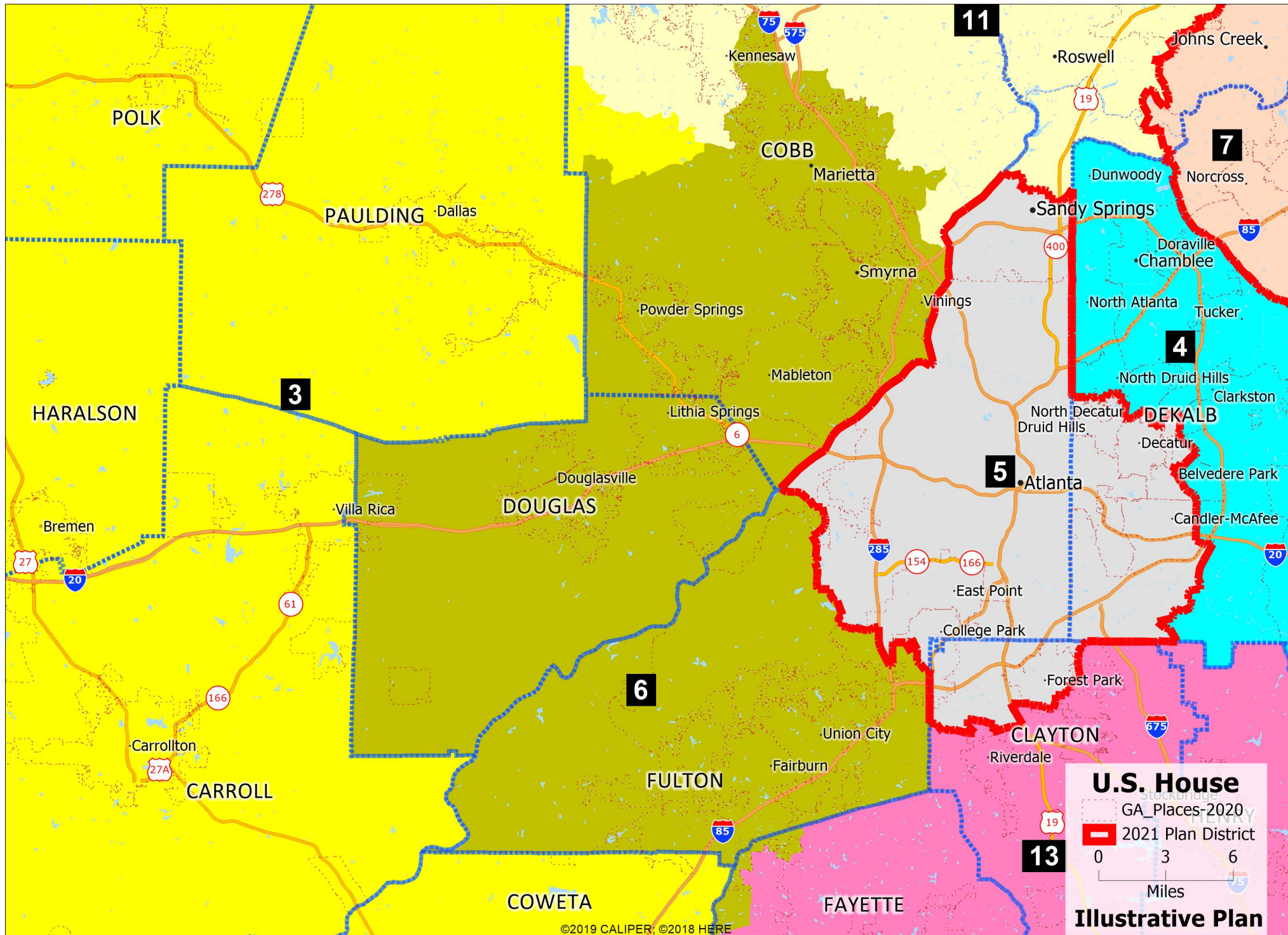


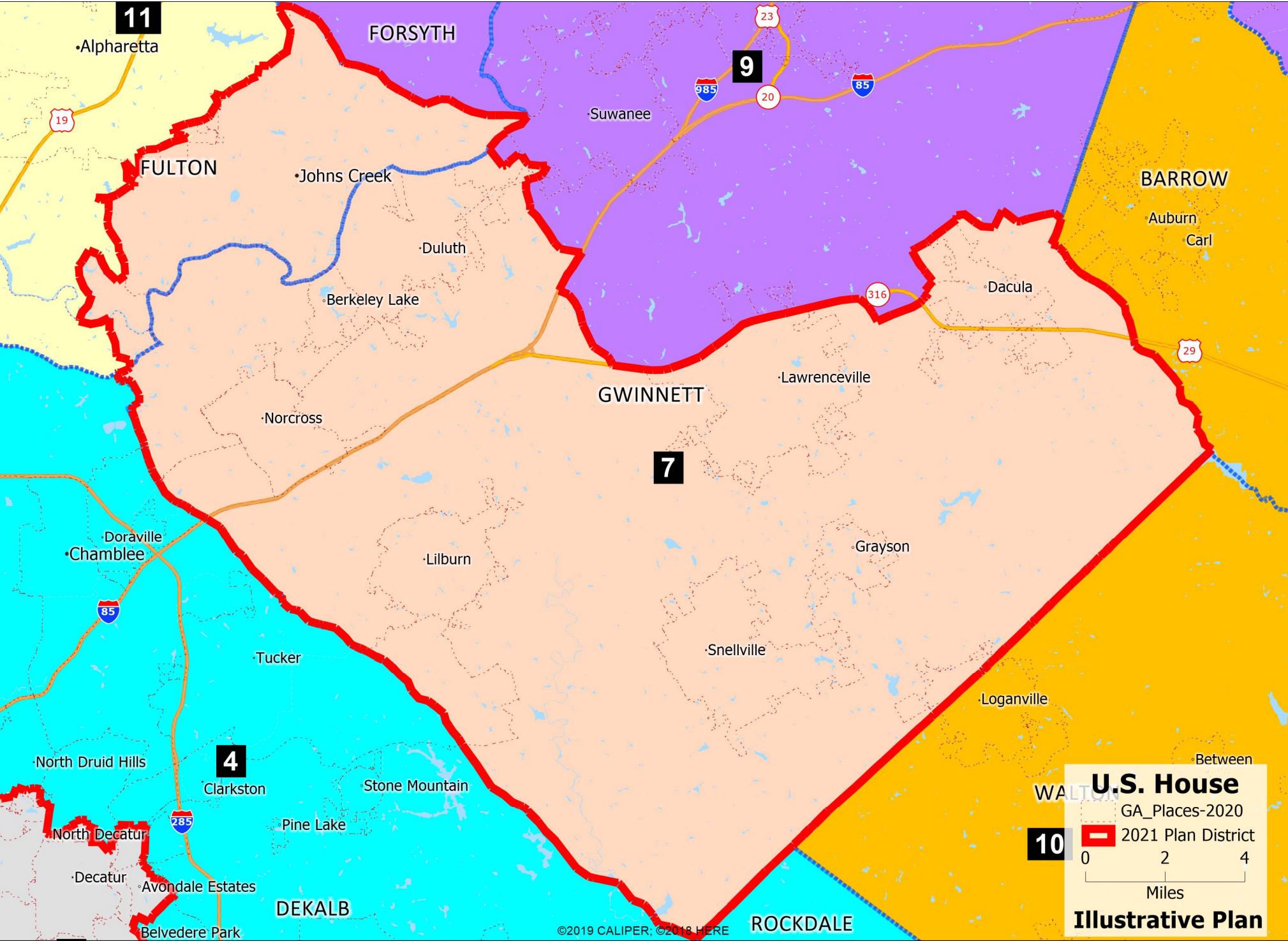


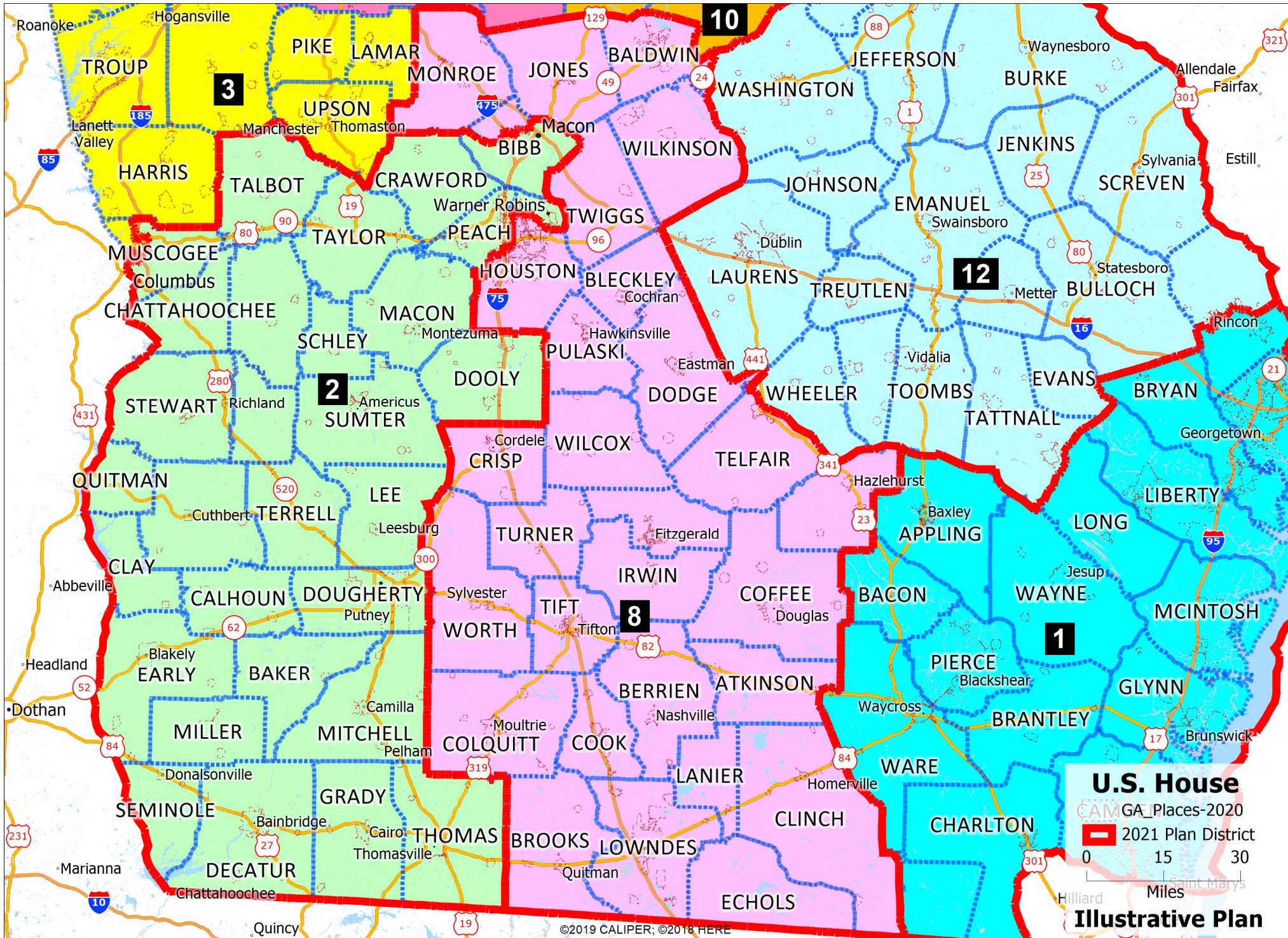


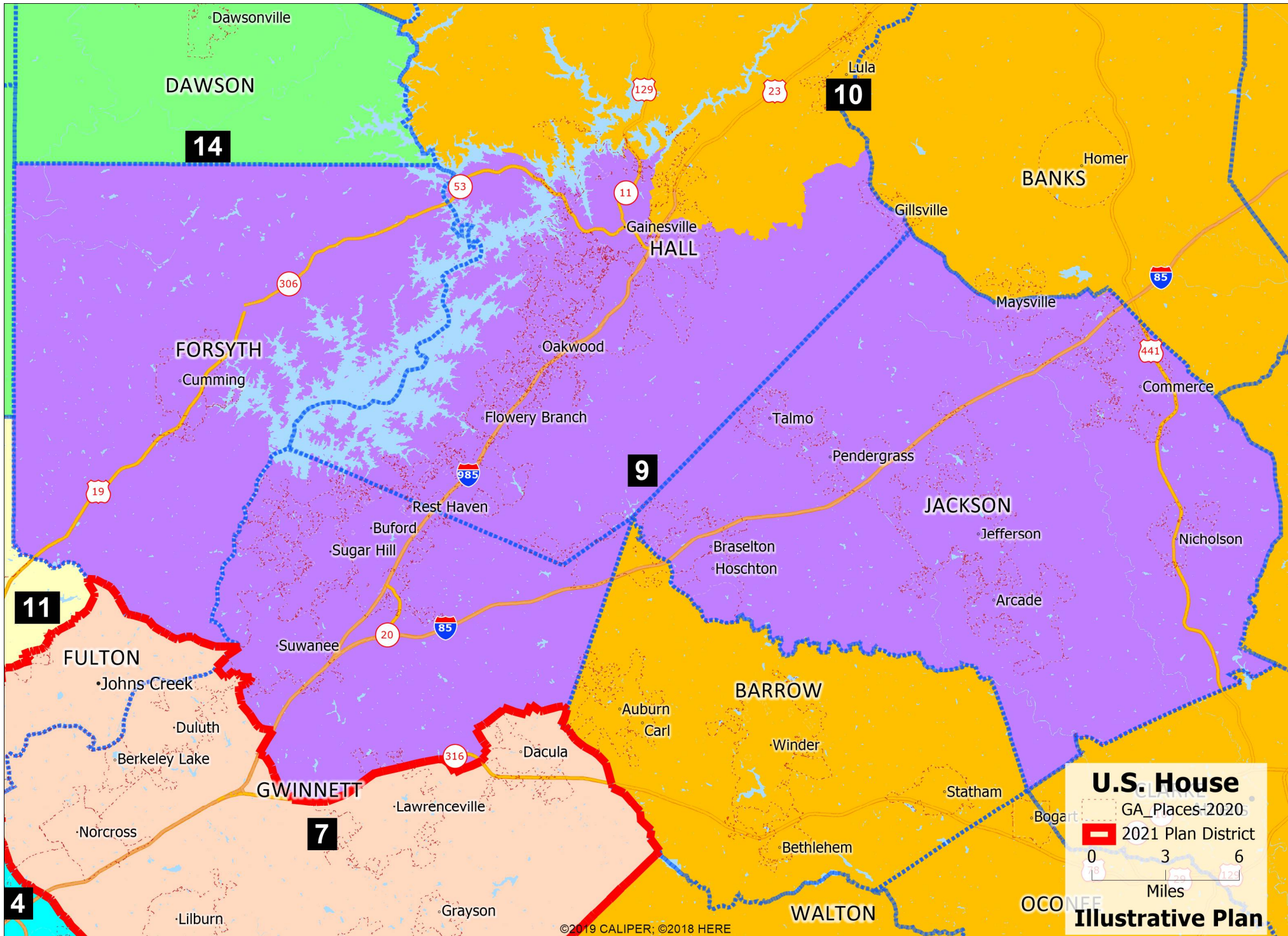


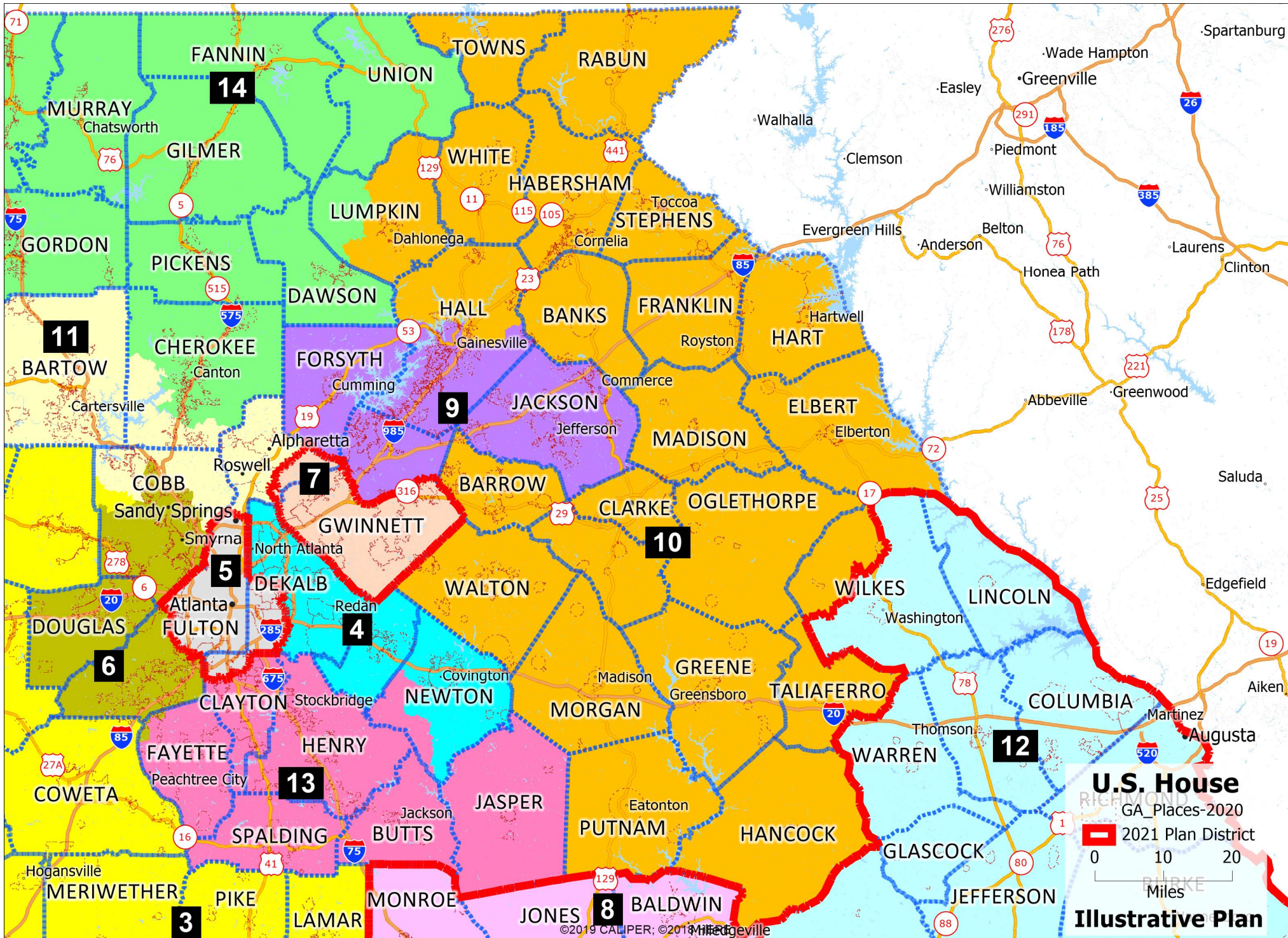


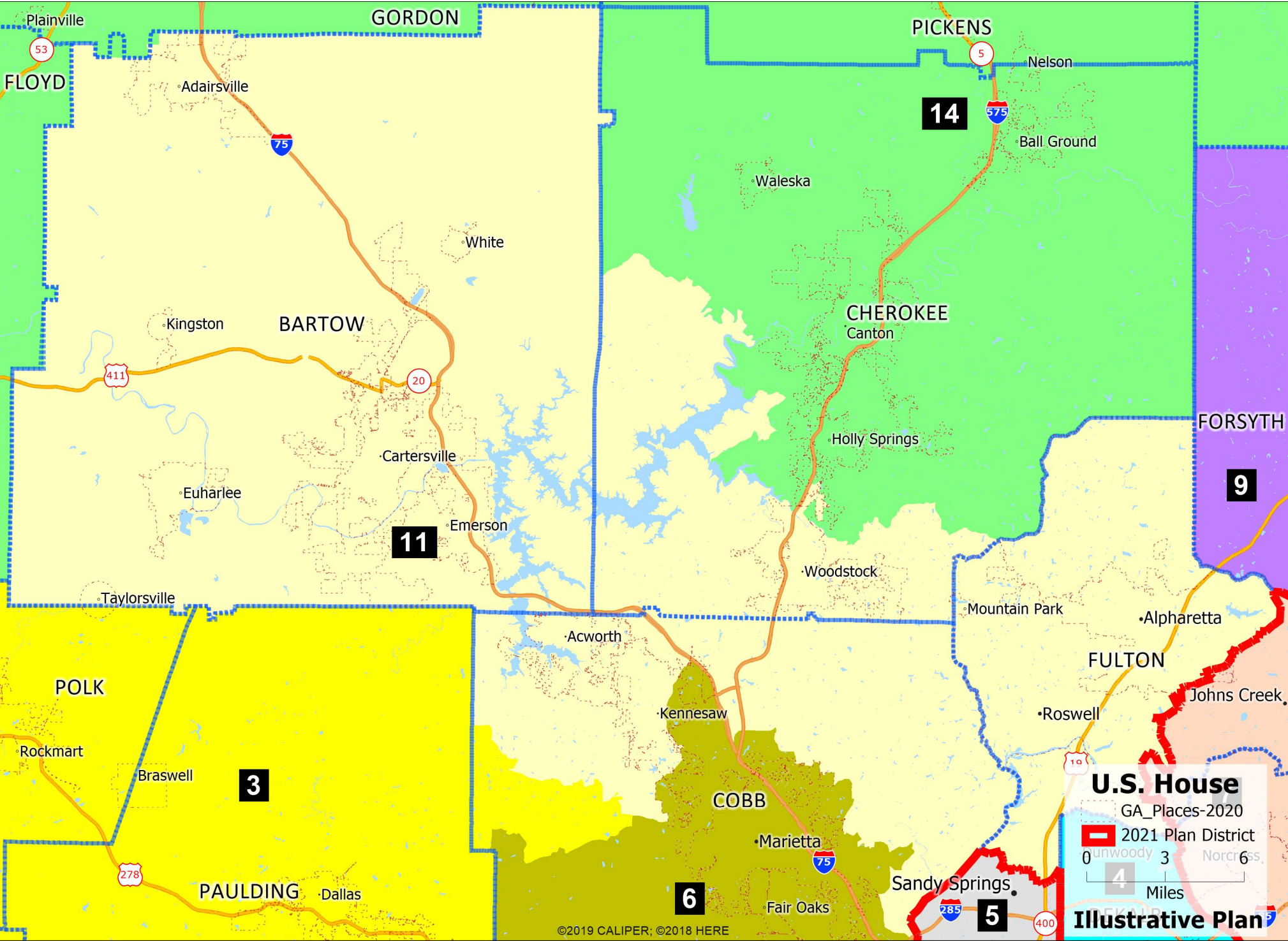


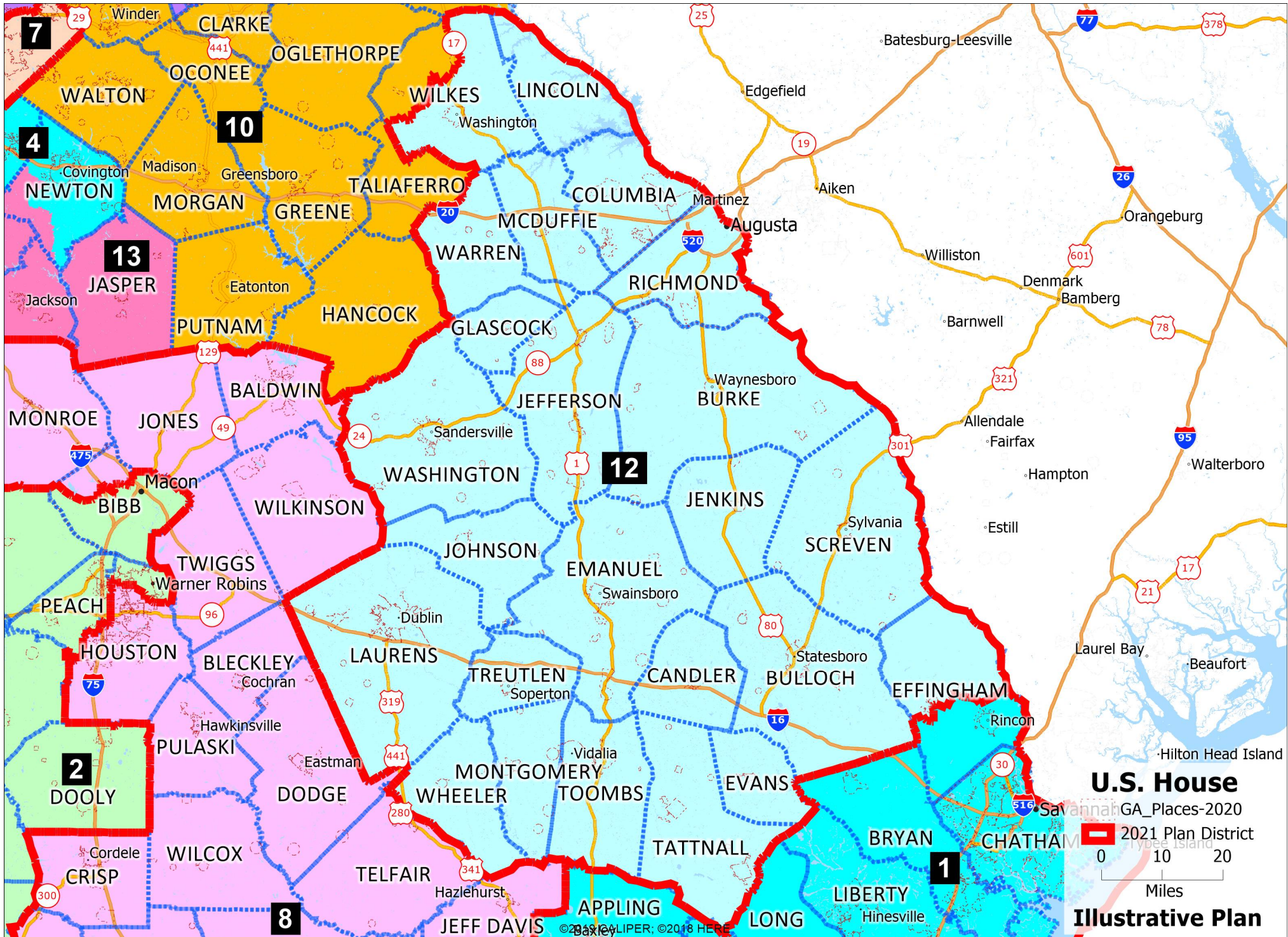


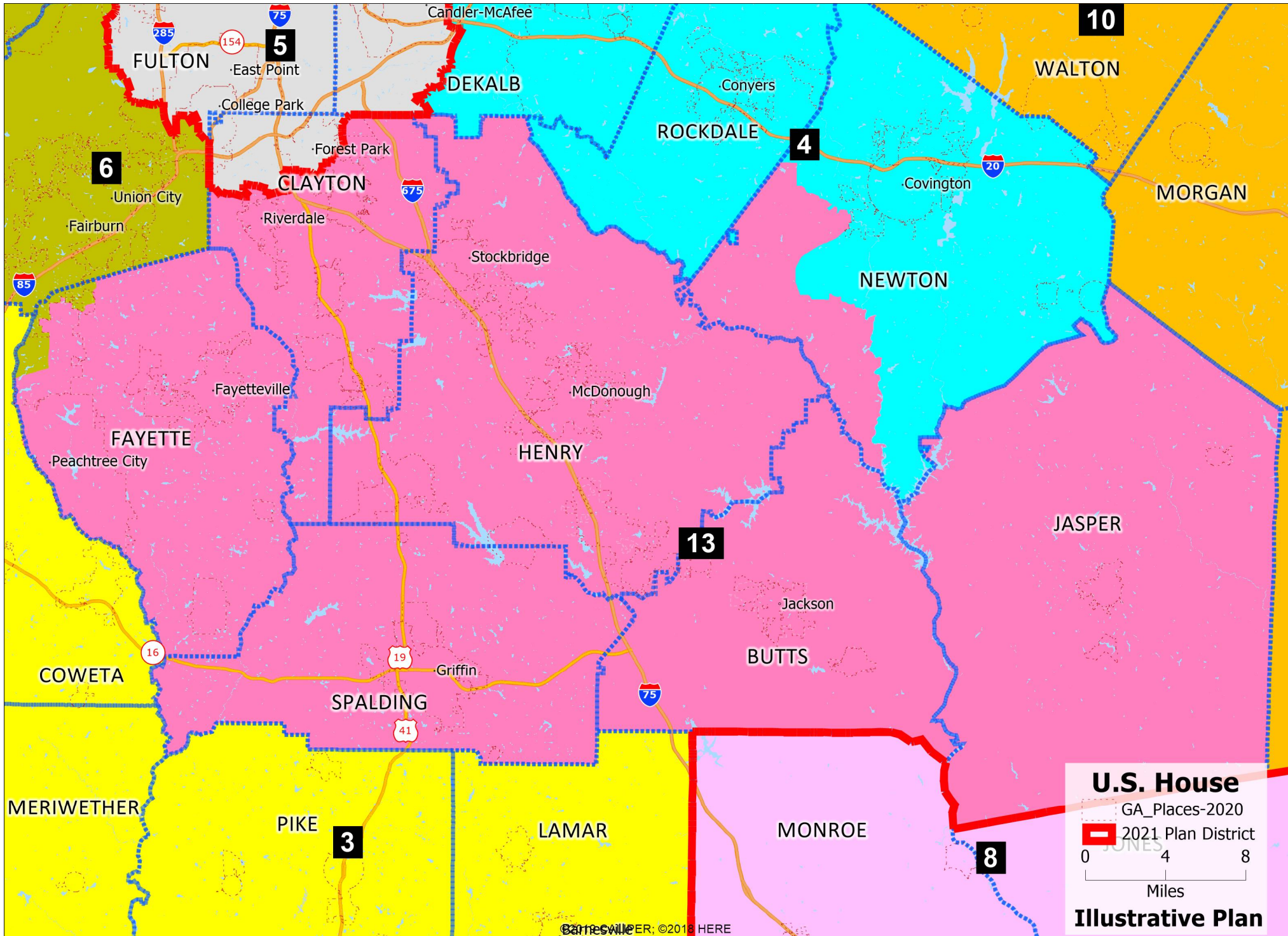


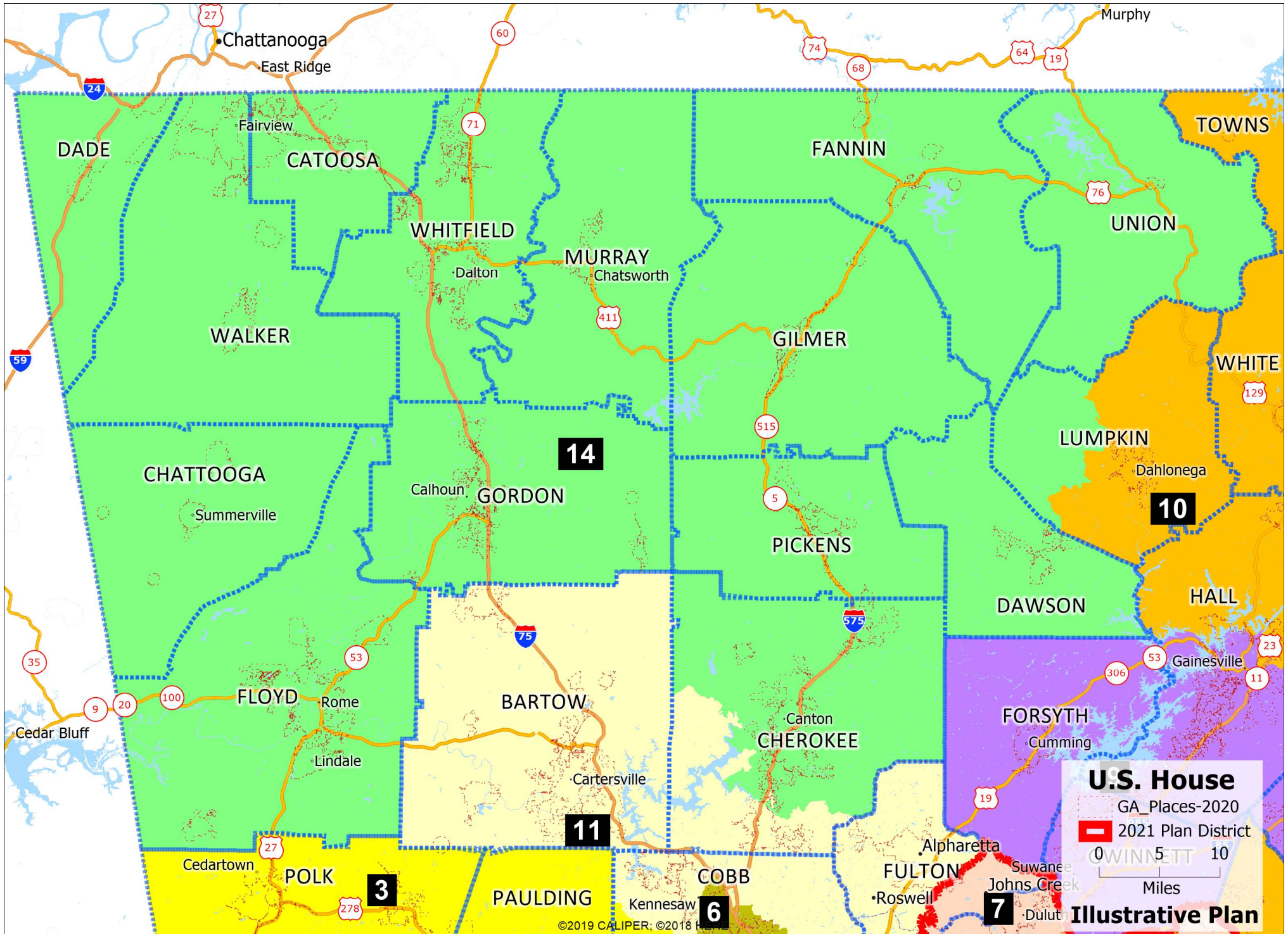












DECLARATION OF WILLIAM S. COOPER:
EXHIBIT I-3

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%

Plan Components with Population Detail

Nov14_GA_congress

	Total Population	NH_Wht	AP_BlK	[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 56.76%	16,975 37.06%	1,577 3.44%
Voting Age	35,037	20,740 59.19%	12,332 35.20%	970 2.77%
County: Webster GA				
Total:	2,348	1,136 48.38%	1,107 47.15%	59 2.51%
Voting Age	1,847	931 50.41%	844 45.70%	36 1.95%
District 002 Total				
Total:	765,137	305,611 39.94%	393,195 51.39%	45,499 5.95%
Voting Age	587,555	251,047 42.73%	289,612 49.29%	30,074 5.12%
District 003				
County: Carroll GA				
Total:	119,148	80,725 67.75%	24,618 20.66%	9,586 8.05%
Voting Age	90,996	63,803 70.12%	17,827 19.59%	6,129 6.74%
County: Cobb GA				
Total:	25,421	19,628 77.21%	2,784 10.95%	1,371 5.39%
Voting Age	18,690	14,828 79.34%	1,889 10.11%	872 4.67%
County: Coweta GA				
Total:	146,158	99,421 68.02%	28,289 19.36%	11,053 7.56%
Voting Age	111,155	78,073 70.24%	20,196 18.17%	7,384 6.64%
County: Haralson GA				
Total:	29,919	26,825 89.66%	1,541 5.15%	497 1.66%
Voting Age	22,854	20,617 90.21%	1,106 4.84%	323 1.41%
County: Harris GA				
Total:	34,668	25,925 74.78%	5,742 16.56%	1,417 4.09%
Voting Age	26,799	20,298 75.74%	4,431 16.53%	908 3.39%
County: Heard GA				
Total:	11,412	9,589 84.03%	1,142 10.01%	253 2.22%
Voting Age	8,698	7,407 85.16%	832 9.57%	153 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	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:	70,115	33,771	30,394	4,015
		48.17%	43.35%	5.73%
Voting Age	53,476	27,197	22,187	2,597
		50.86%	41.49%	4.86%
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 004 Total				
Total:	765,136	212,004	410,019	87,756
		27.71%	53.59%	11.47%
Voting Age	590,640	177,832	311,670	58,947
		30.11%	52.77%	9.98%
District 005				
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 005 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%
District 006				
County: Cobb GA				
Total:	452,386	164,732	175,347	83,302
		36.41%	38.76%	18.41%
Voting Age	352,053	141,014	131,674	55,556
		40.05%	37.40%	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_Bl	[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_Bl	[Hispanic Origin]
District 010				
County: Morgan GA				
Total:	20,097	14,487	4,339	712
		72.09%	21.59%	3.54%
Voting Age	15,574	11,452	3,280	434
		73.53%	21.06%	2.79%
County: Oconee GA				
Total:	41,799	33,886	2,280	2,347
		81.07%	5.45%	5.61%
Voting Age	30,221	24,942	1,660	1,405
		82.53%	5.49%	4.65%
County: Oglethorpe GA				
Total:	14,825	10,903	2,468	869
		73.54%	16.65%	5.86%
Voting Age	11,639	8,799	1,853	531
		75.60%	15.92%	4.56%
County: Putnam GA				
Total:	22,047	14,316	5,701	1,557
		64.93%	25.86%	7.06%
Voting Age	17,847	12,209	4,229	1,031
		68.41%	23.70%	5.78%
County: Rabun GA				
Total:	16,883	14,625	210	1,452
		86.63%	1.24%	8.60%
Voting Age	13,767	12,236	129	928
		88.88%	0.94%	6.74%
County: Stephens GA				
Total:	26,784	21,323	3,527	857
		79.61%	13.17%	3.20%
Voting Age	21,163	17,310	2,467	578
		81.79%	11.66%	2.73%
County: Taliaferro GA				
Total:	1,559	591	876	69
		37.91%	56.19%	4.43%
Voting Age	1,289	506	722	46
		39.26%	56.01%	3.57%
County: Towns GA				
Total:	12,493	11,469	168	415
		91.80%	1.34%	3.32%
Voting Age	10,923	10,100	137	338
		92.47%	1.25%	3.09%
County: Walton GA				
Total:	96,673	68,499	18,804	5,228
		70.86%	19.45%	5.41%
Voting Age	73,098	53,647	13,165	3,236
		73.39%	18.01%	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

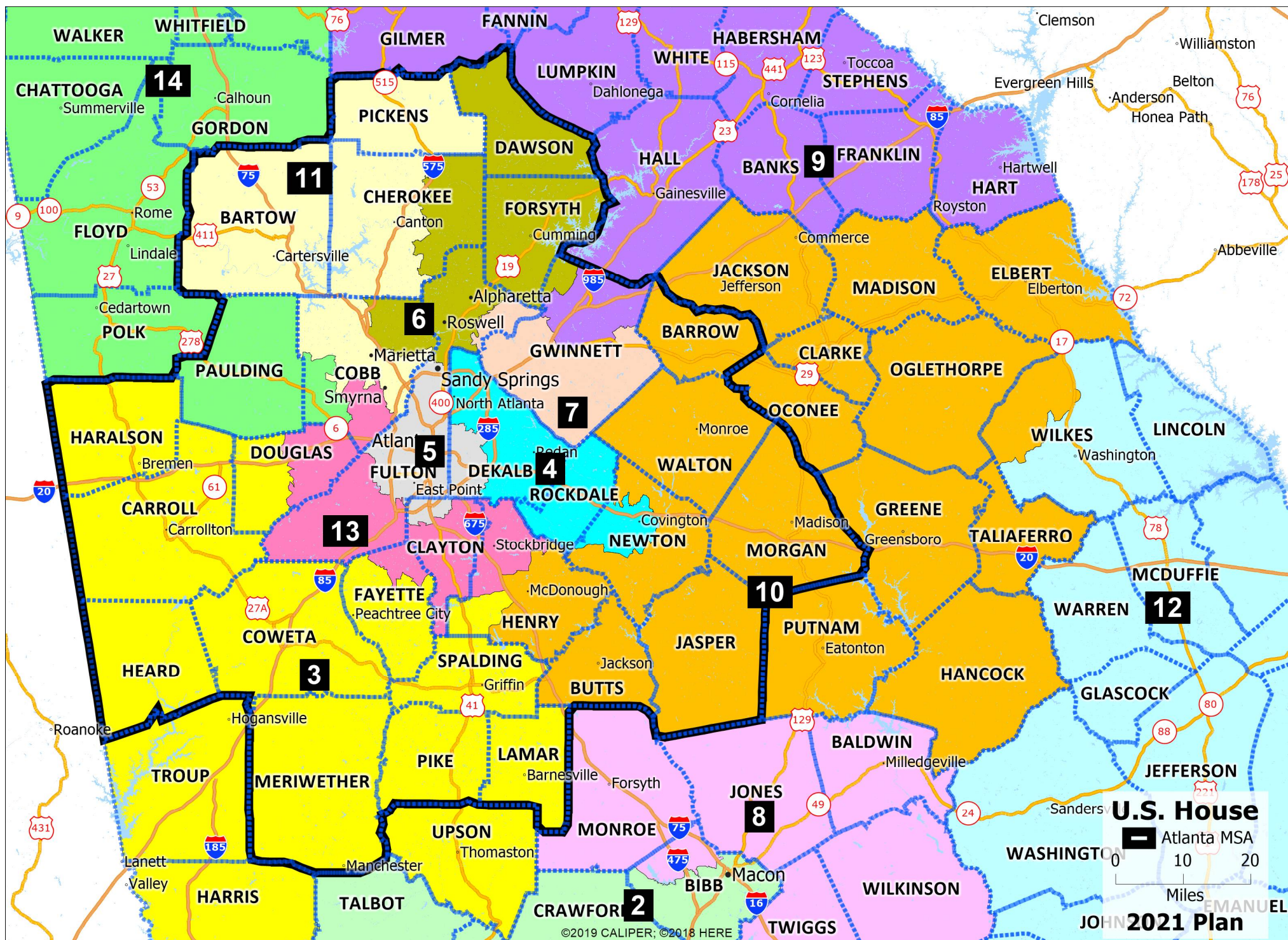
	Total Population	NH_Wht	AP_BlK	[Hispanic Origin]
District 014				
County: Dawson GA				
Total:	26,798	23,544	392	1,605
		87.86%	1.46%	5.99%
Voting Age	21,441	19,183	249	1,047
		89.47%	1.16%	4.88%
County: Fannin GA				
Total:	25,319	23,351	199	753
		92.23%	0.79%	2.97%
Voting Age	21,188	19,721	133	505
		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

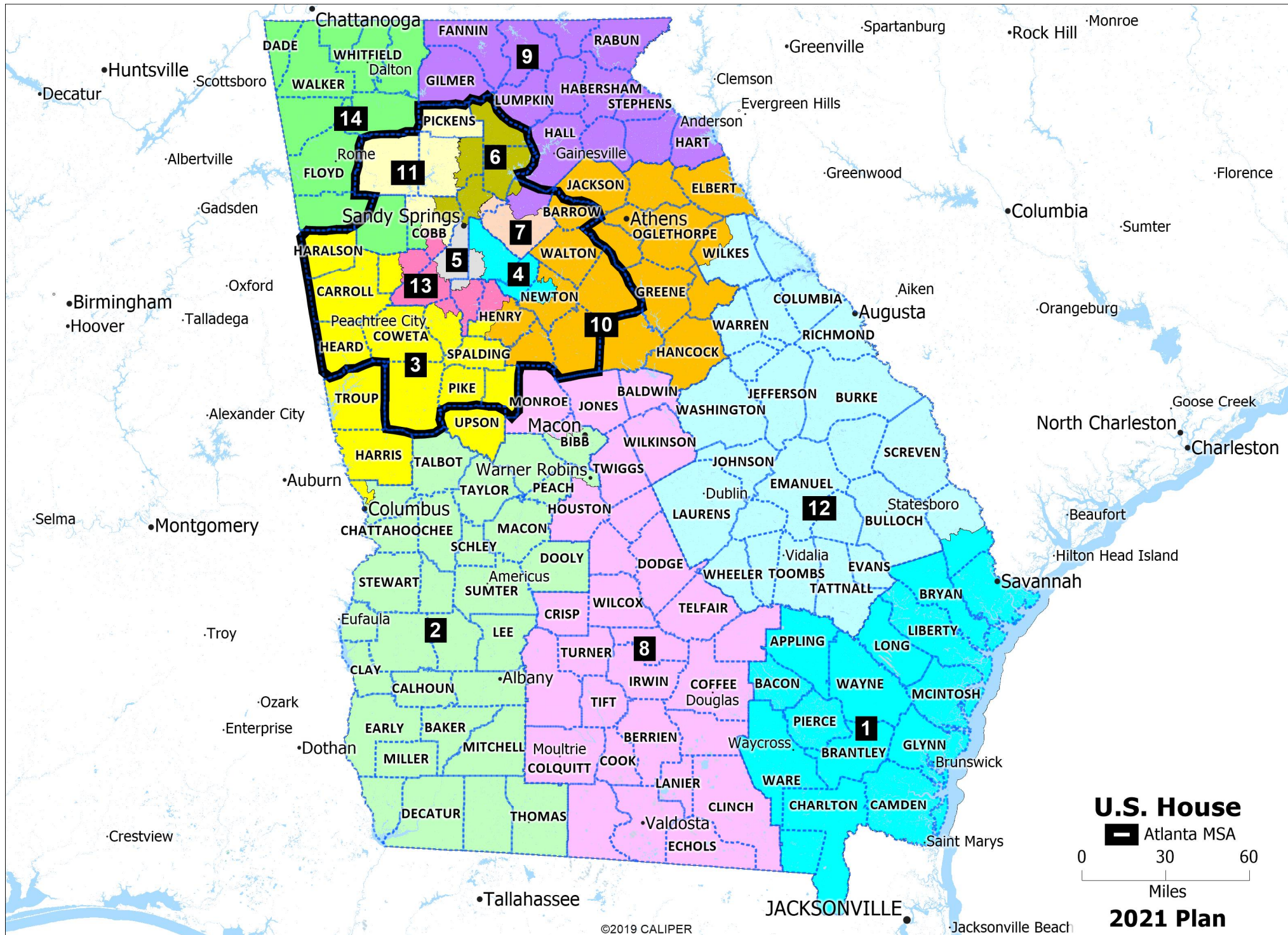
Nov14_GA_congress

	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%

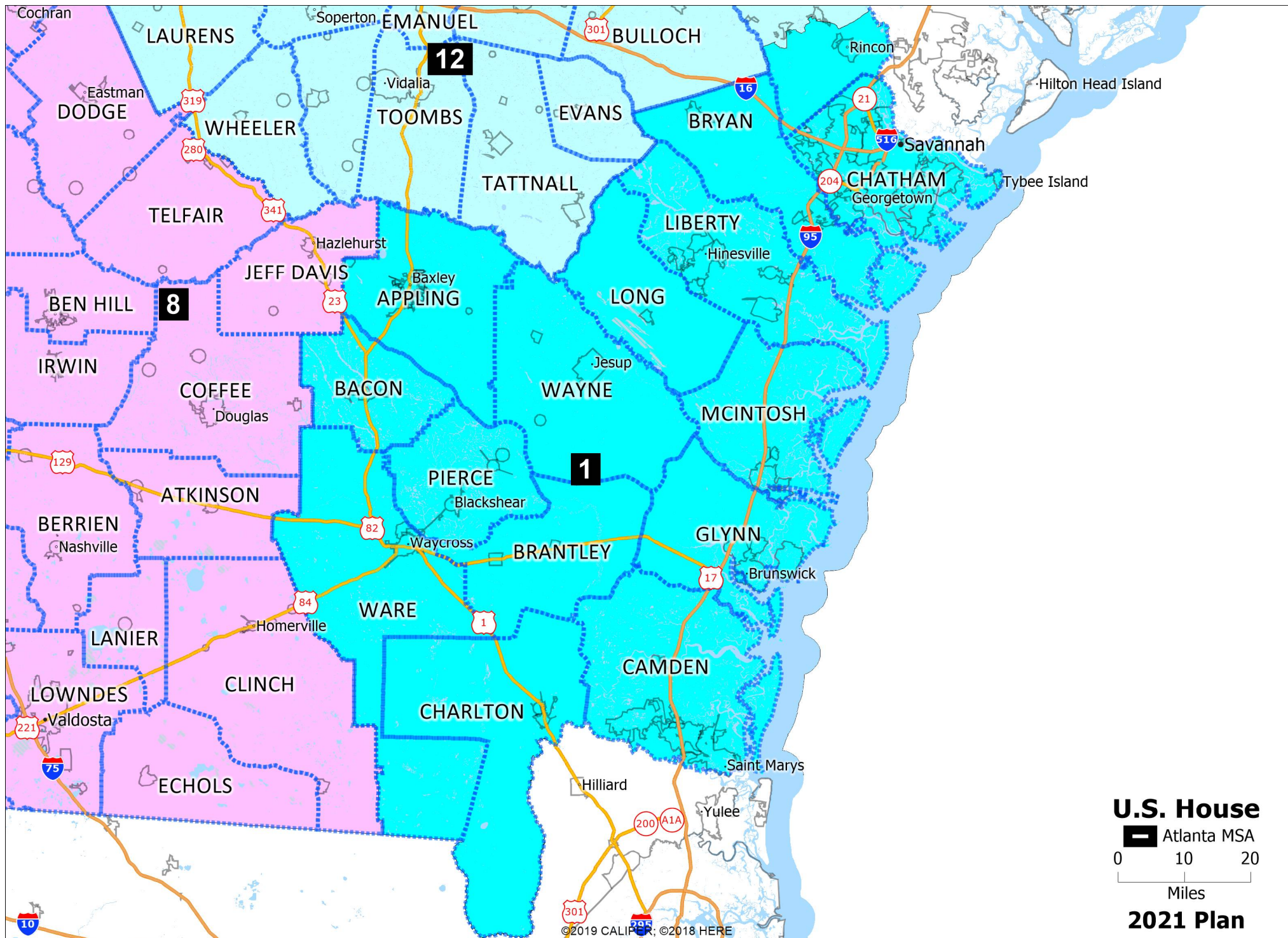
CVAP Source:

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

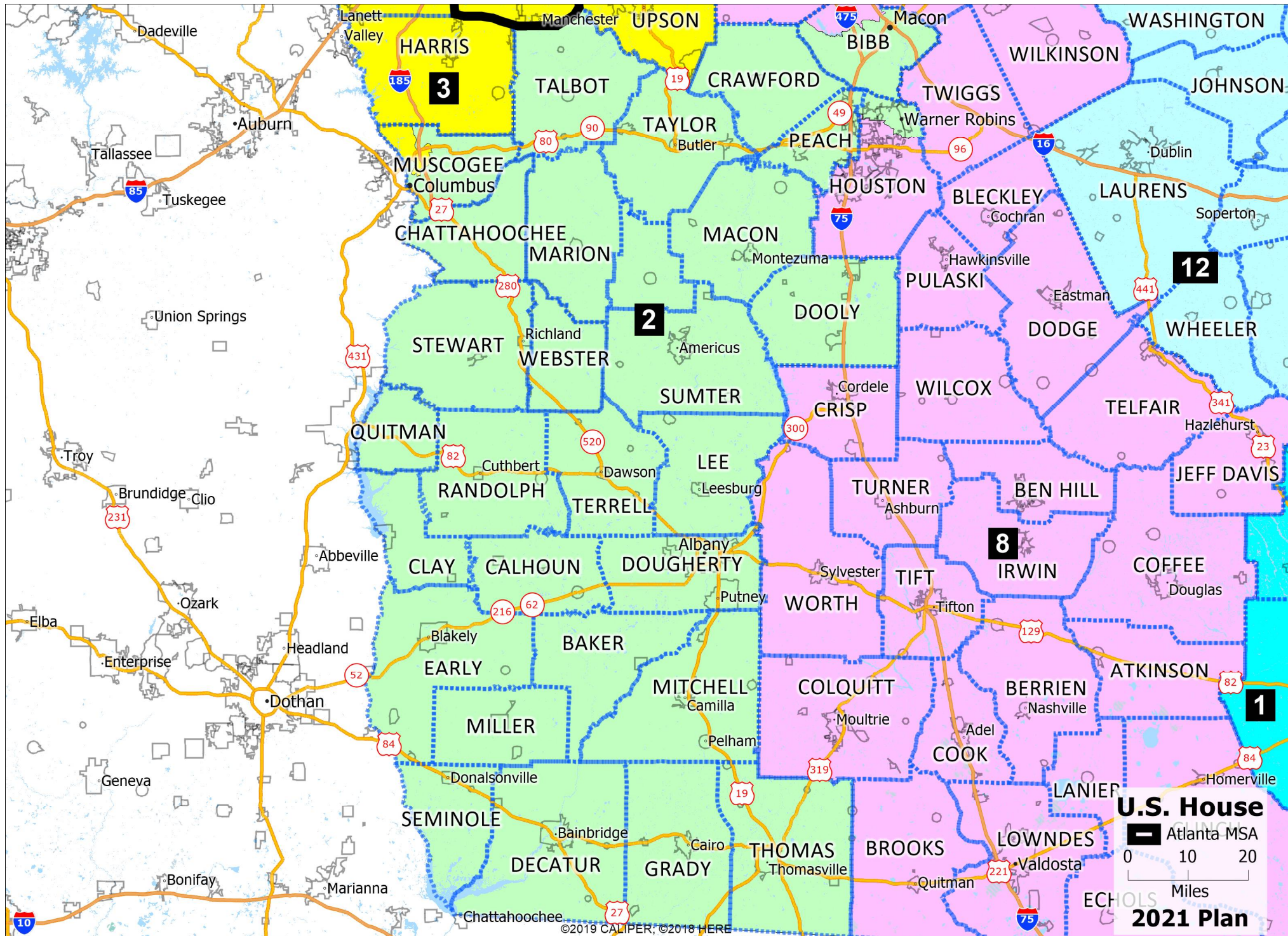
Note: Citizen Voting Age Population (CVAP) percentages are disaggregated from block-group level ACS estimates

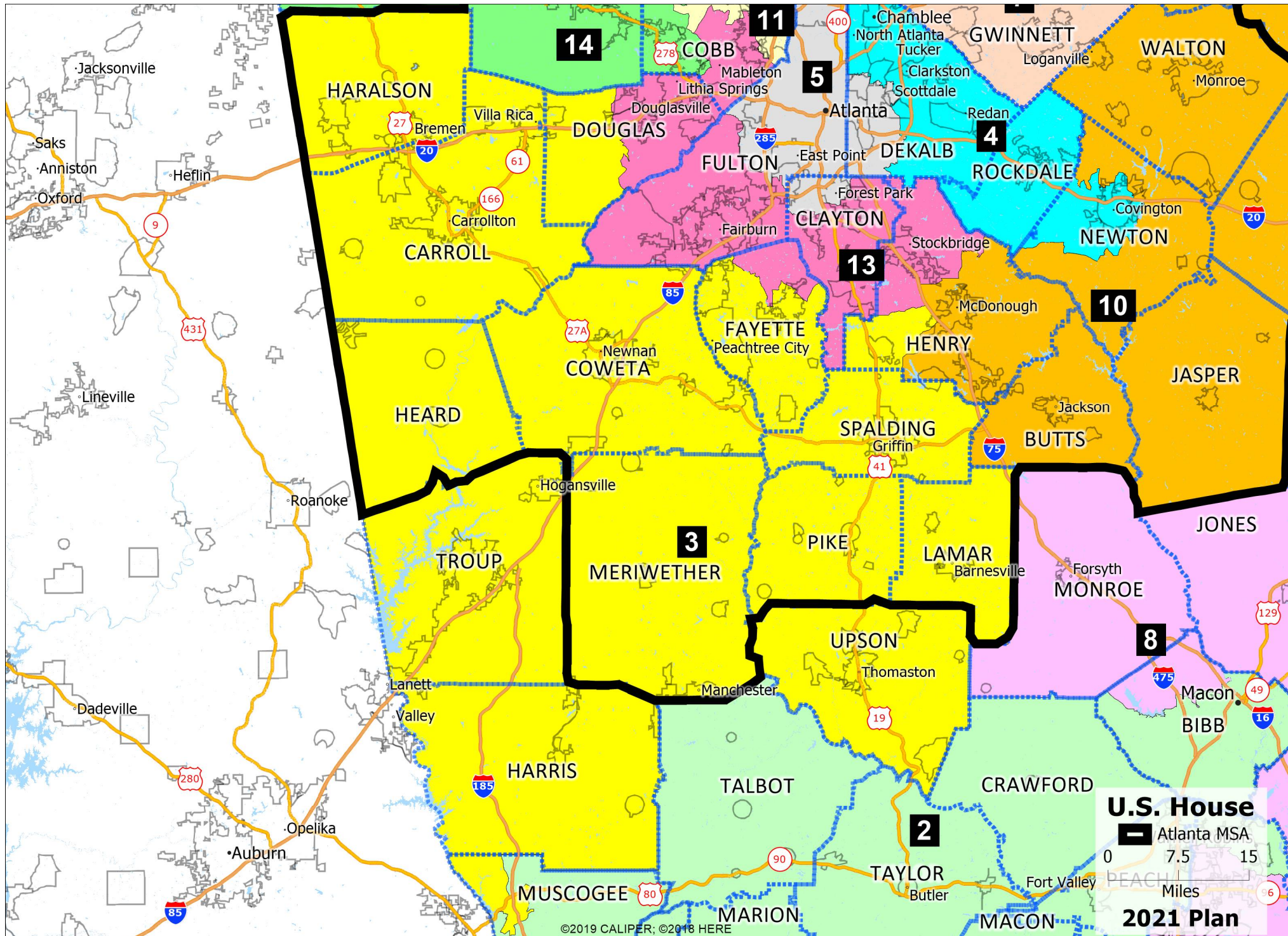
* Single race NH Black CVAP, **NH DOJ Black= SR NH Black CVAP+SR NH Black/White CVAP

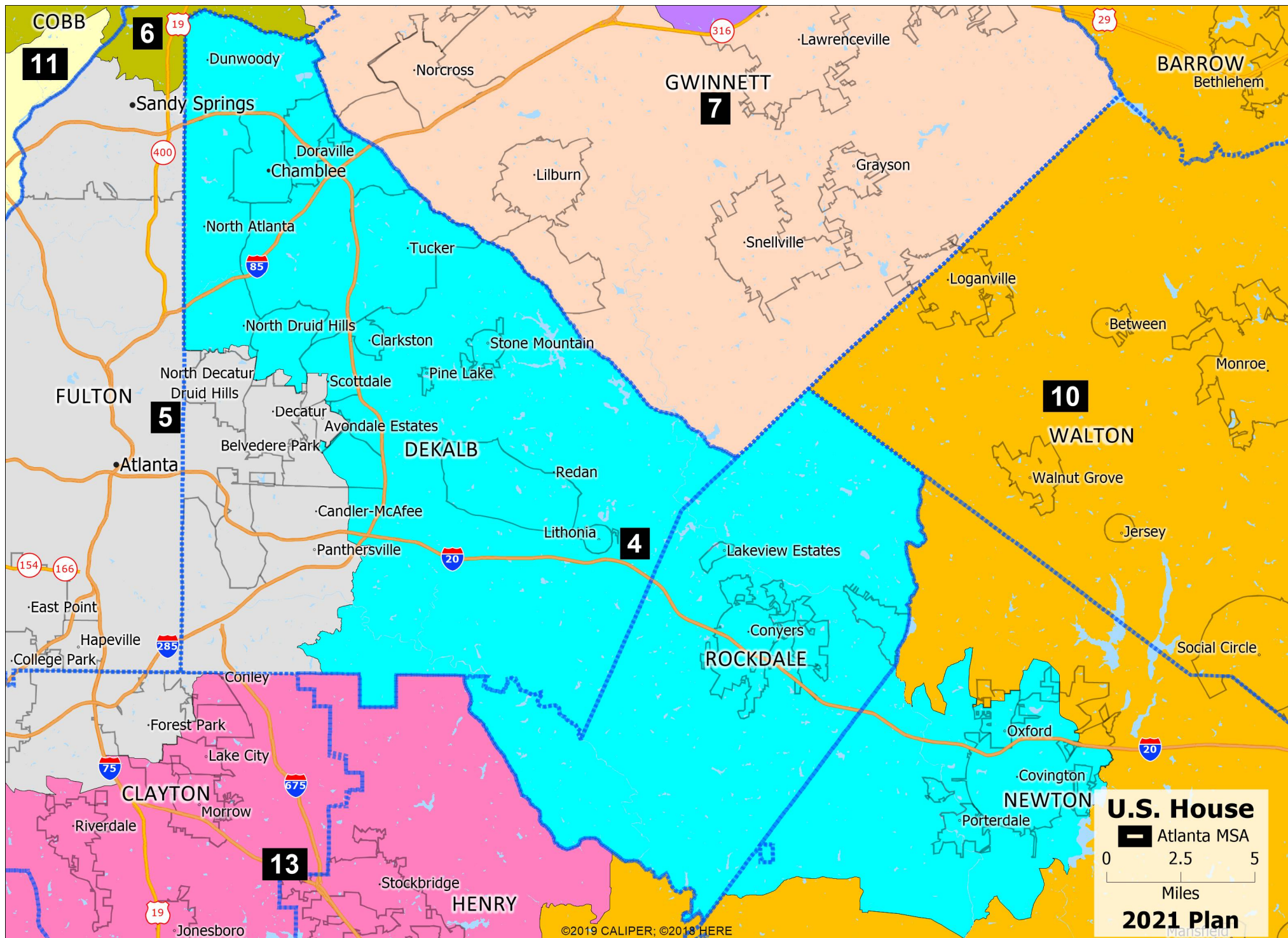
DECLARATION OF WILLIAM S. COOPER:
EXHIBIT K-2

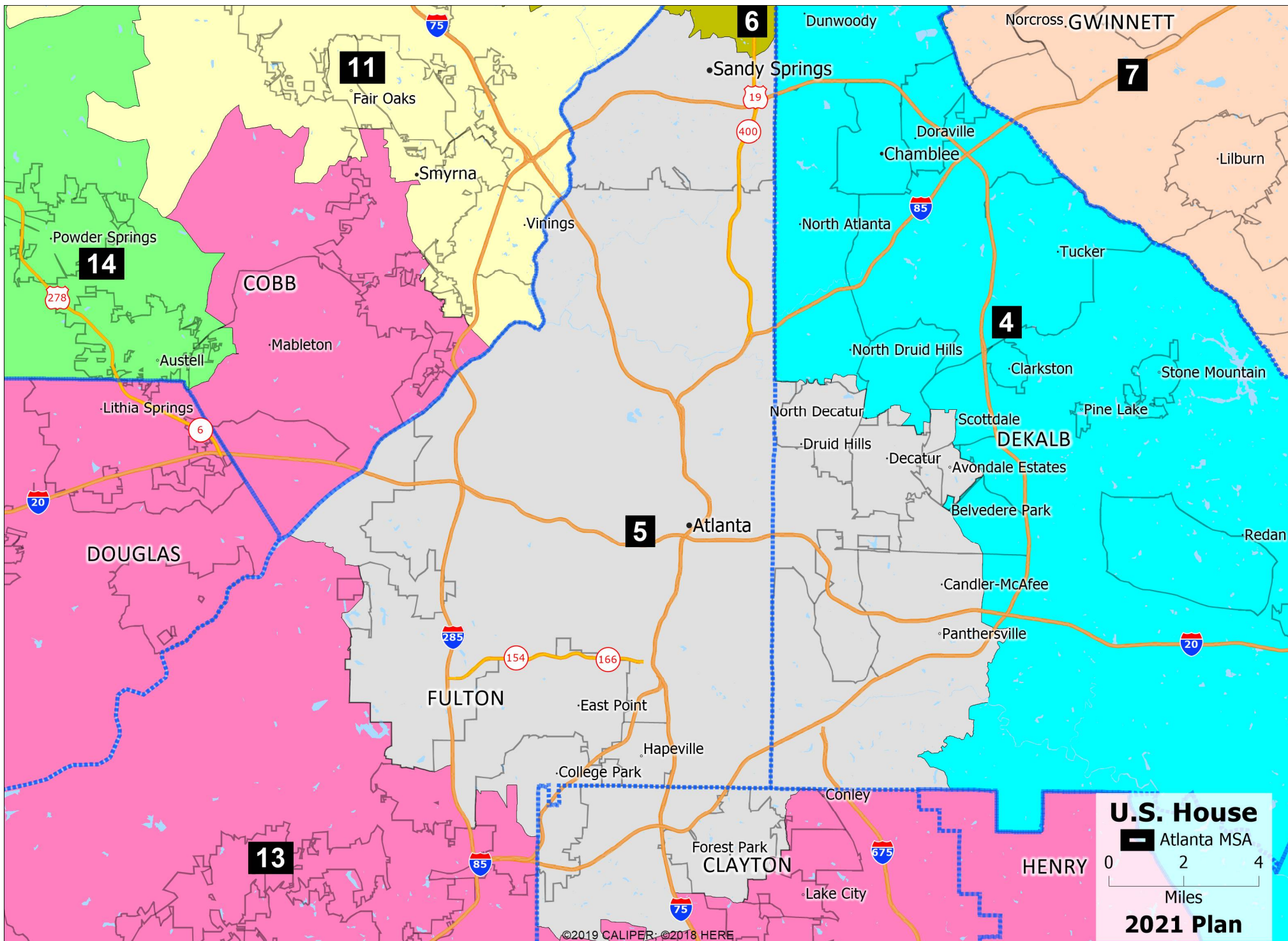


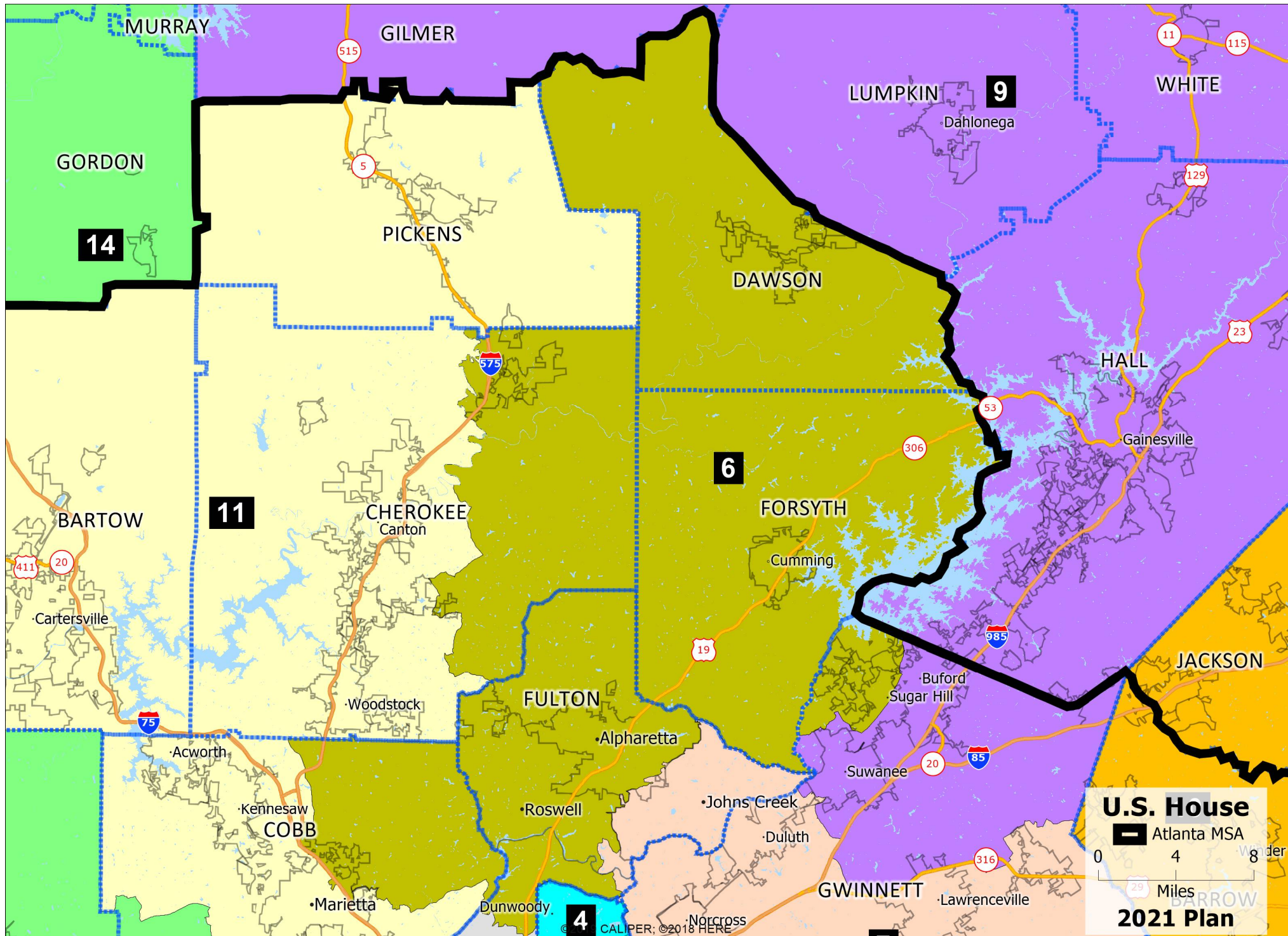
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2021 Plan

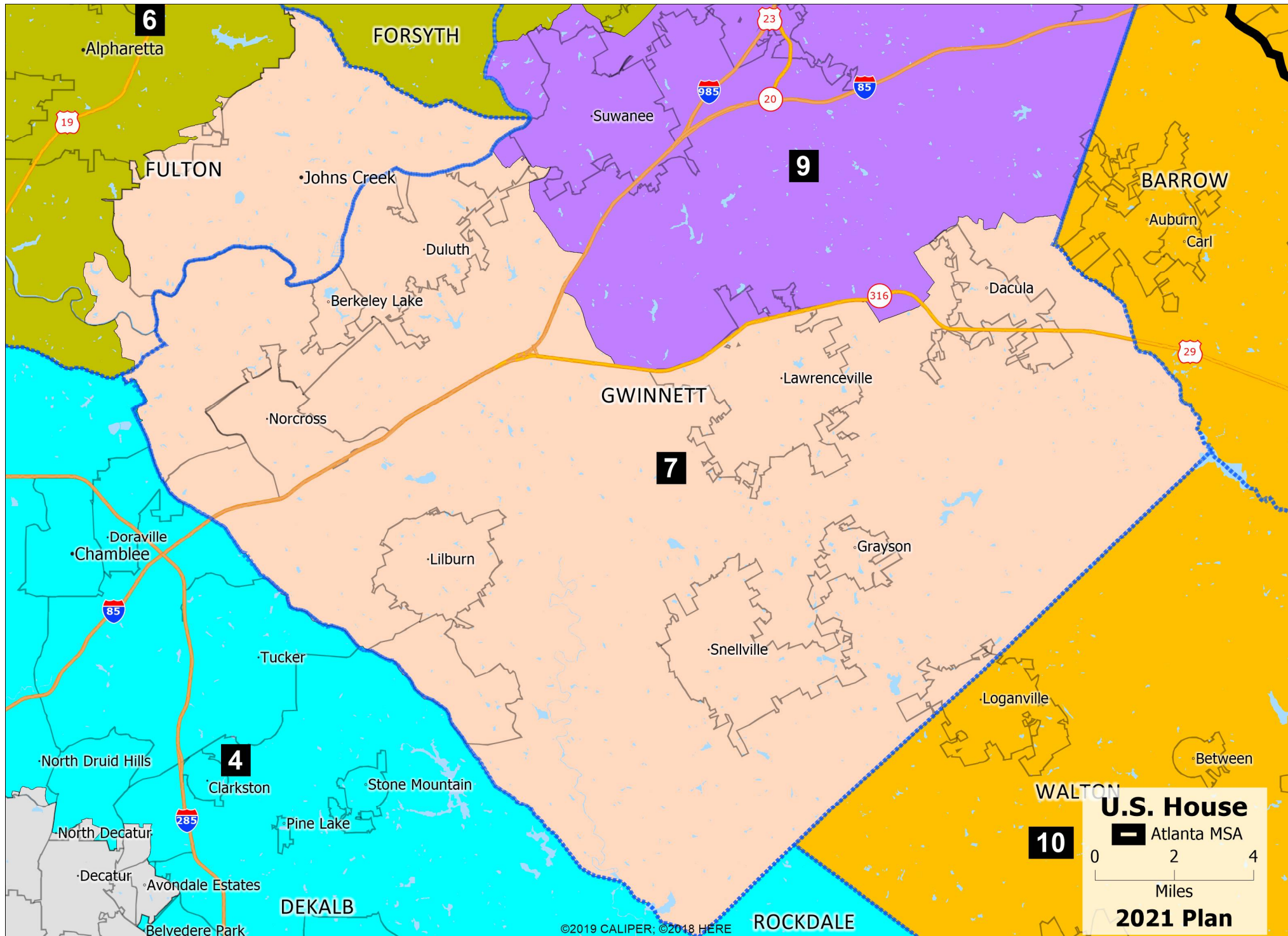


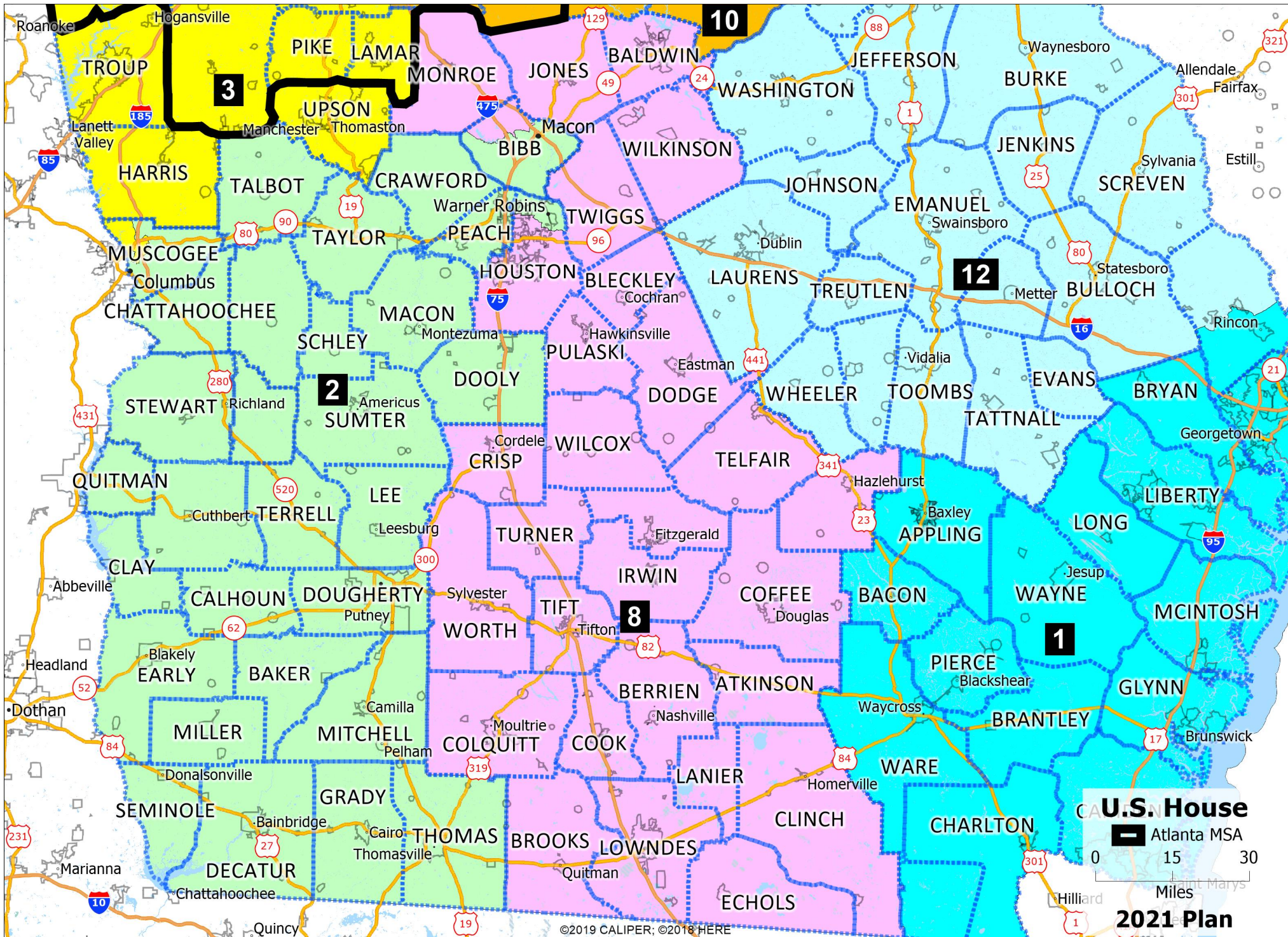


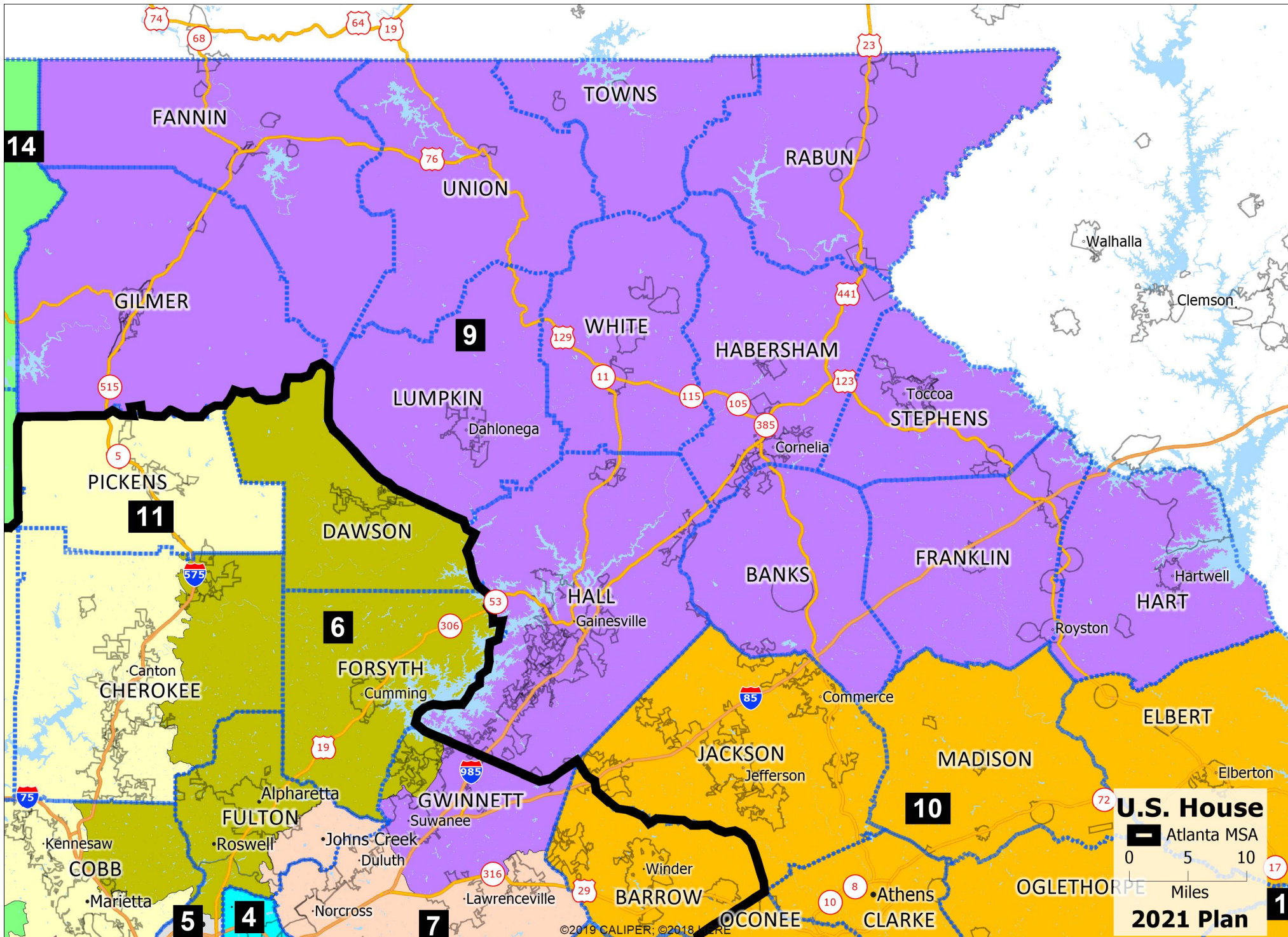


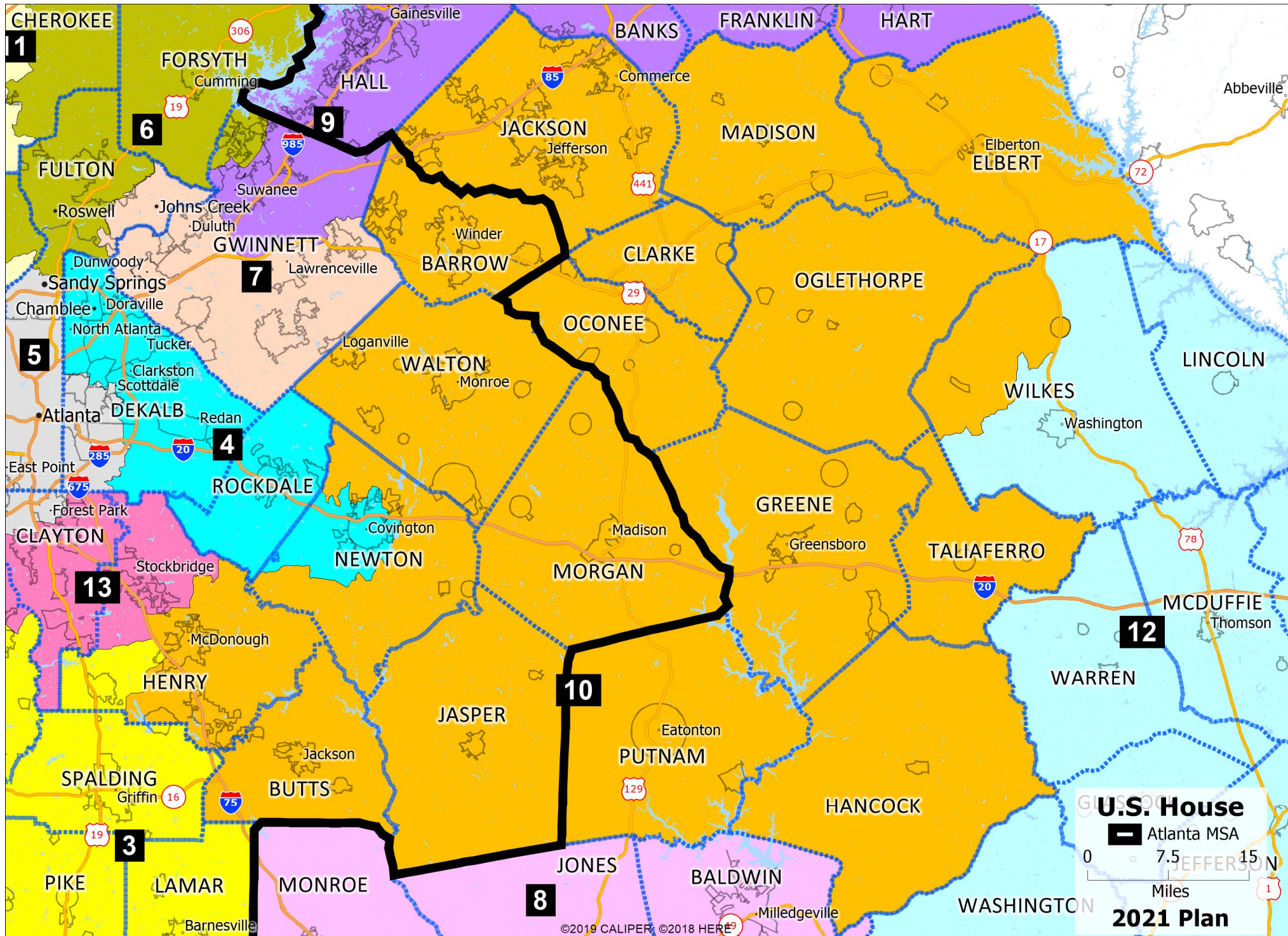


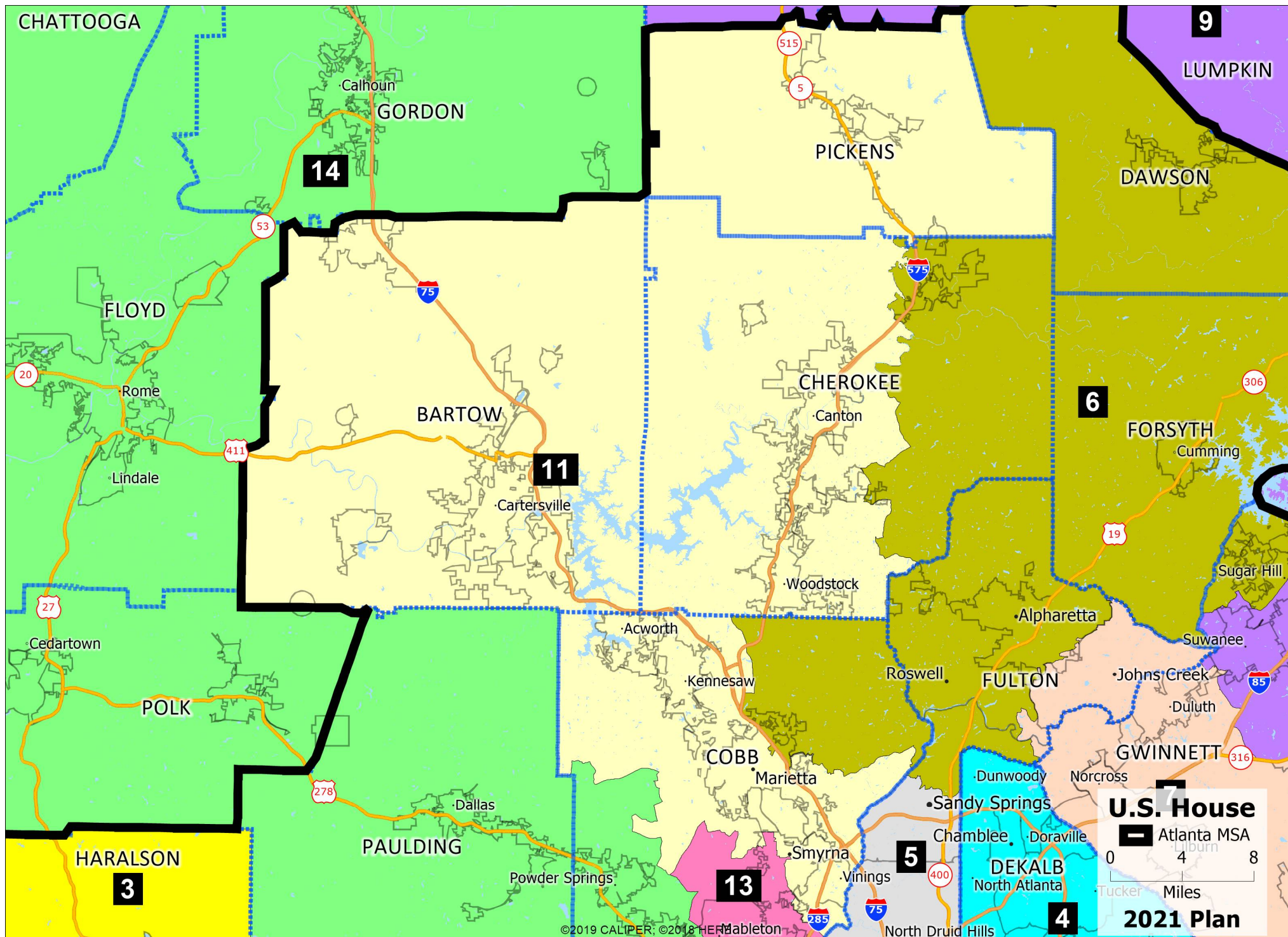




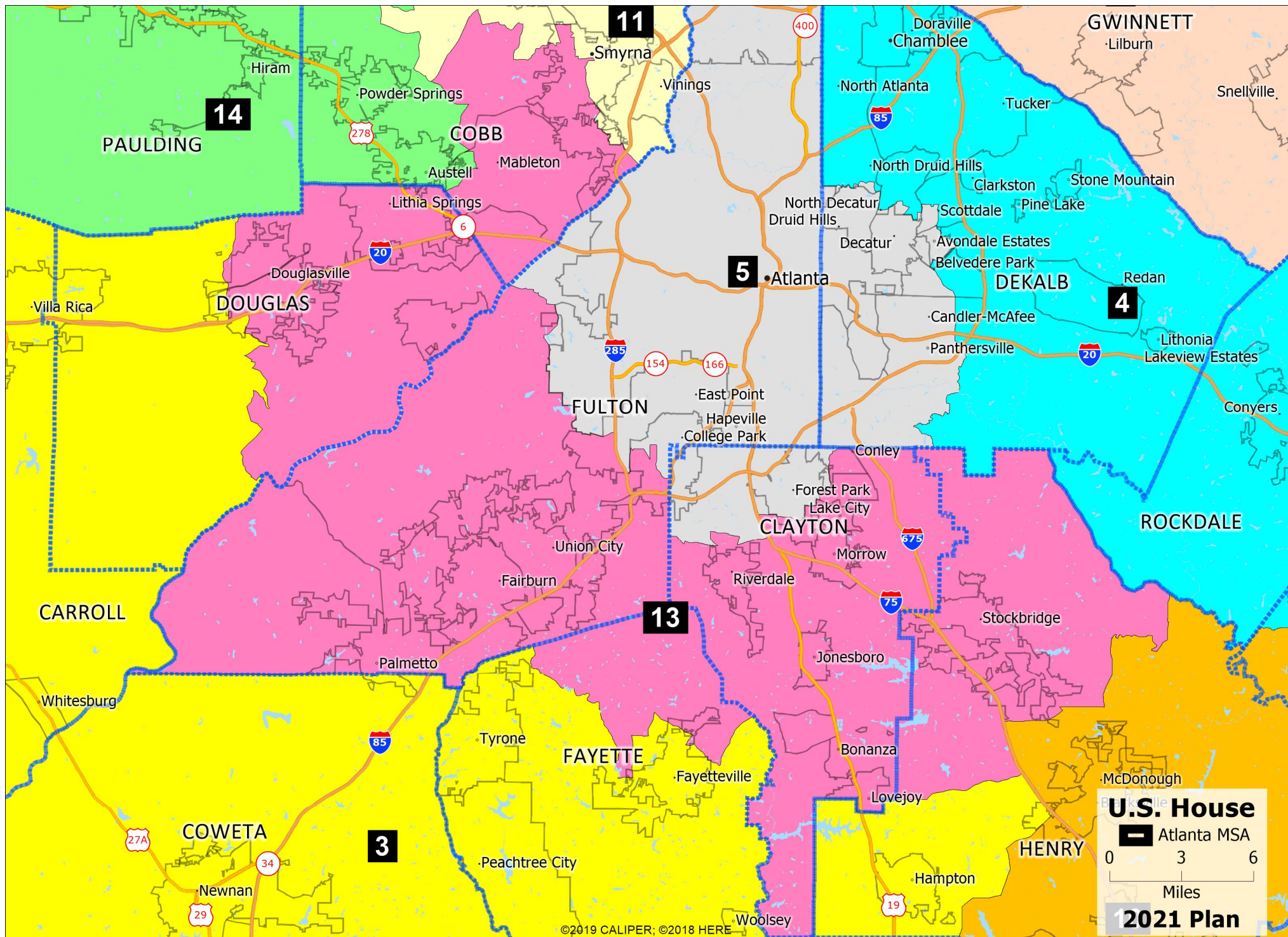


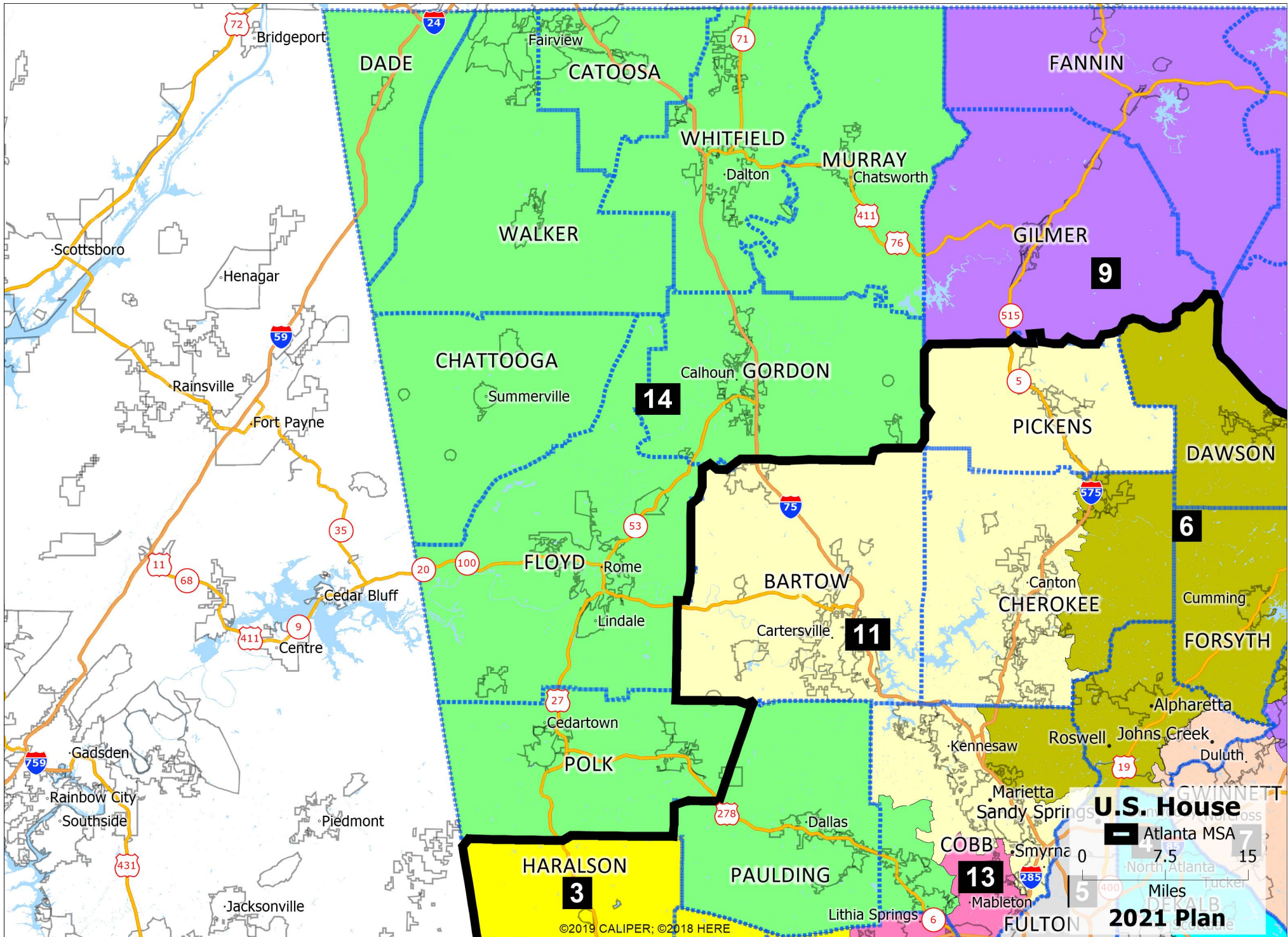












DECLARATION OF WILLIAM S. COOPER:
EXHIBIT K-3

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_BlK	[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_BlK	[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	3,161	272
		59.15%	36.06%	3.10%
Voting Age	7,218	4,215	2,693	209
		58.40%	37.31%	2.90%
County: Wilkinson GA				
Total:	8,877	5,110	3,330	239
		57.56%	37.51%	2.69%
Voting Age	7,026	4,165	2,549	152
		59.28%	36.28%	2.16%
County: Worth GA				
Total:	20,784	14,427	5,517	381
		69.41%	26.54%	1.83%
Voting Age	16,444	11,747	4,108	244
		71.44%	24.98%	1.48%
District 8 Total				
Total:	765,136	443,123	241,628	54,850
		57.91%	31.58%	7.17%
Voting Age	585,857	354,572	175,967	35,732
		60.52%	30.04%	6.10%
District 9				
County: Banks GA				
Total:	18,035	15,578	589	1,164
		86.38%	3.27%	6.45%
Voting Age	13,900	12,278	365	721
		88.33%	2.63%	5.19%
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: 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: 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: Gwinnett GA				
Total:	249,728	111,897	54,397	40,057
		44.81%	21.78%	16.04%
Voting Age	186,718	88,365	38,478	27,103
		47.33%	20.61%	14.52%

Plan Components with Population Detail

Ga_Congress_Enacted_2021_P

	Total Population	NH_Wht	AP_BlK	[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_Bl	[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_Bl	[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_Bl	[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_BlK	[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 Subdivision 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%
005	Sandy Springs	52,999	49.04%	010	Auburn	7,270	97.00%
				010	Braselton	2,007	14.97%
005	South Fulton	3,731	3.47%	010	Gainesville	2,589	6.12%
005	College Park	8,958	64.31%	010	Gillsville	94	30.72%
005	East Point	34,652	90.34%	010	Maysville	1,033	55.33%
005	Atlanta	497,973	99.85%	010	Loganville	10,972	77.67%
006	Villa Rica	7,264	42.80%	011	Sandy Springs	53,531	49.53%
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	10,878	100.00%	2	Unadilla	3,118	100.00%
	Wentworth			2	Perry	90	0.44%
1	Thunderbolt	2,556	100.00%	2	Fort Valley	8,780	100.00%
1	Rincon	10,934	100.00%	2	Warner	565	0.70%
1	Tybee Island	3,114	100.00%		Robins		
1	Kingsland	18,337	100.00%	2	Byron	5,702	100.00%
1	St. Marys	18,256	100.00%	2	Bluffton	113	100.00%
1	Woodbine	1,062	100.00%	2	Edison	1,230	100.00%
1	Waycross	13,942	100.00%	2	Cuthbert	3,143	100.00%
1	Homeland	886	100.00%	2	Morgan	1,741	100.00%
1	Folkston	4,464	100.00%	2	Leary	524	100.00%
1	Hoboken	480	100.00%	2	Shellman	861	100.00%
1	Blackshear	3,506	100.00%	2	Dawson	4,414	100.00%
1	Patterson	749	100.00%	2	Parrott	120	100.00%
1	Offerman	450	100.00%	2	Lumpkin	891	100.00%
1	Nahunta	1,013	100.00%	2	Richland	1,370	100.00%
1	Alma	3,433	100.00%	2	Buena Vista	1,585	100.00%
1	Screven	769	100.00%	2	Albany	69,647	100.00%
1	Odum	463	100.00%	2	Sasser	287	100.00%
1	Jesup	9,809	100.00%	2	Bronwood	334	100.00%
1	Brunswick	15,210	100.00%	2	Leesburg	3,480	100.00%
1	Darien	1,460	100.00%	2	Smithville	593	100.00%
1	Ludowici	1,590	100.00%	2	Leslie	344	100.00%
1	Gumbranch	235	100.00%	2	De Soto	124	100.00%
1	Walthourville	3,680	100.00%	2	Plains	573	100.00%
1	Allenhurst	816	100.00%	2	Ellaville	1,595	100.00%
1	Hinesville	34,891	100.00%	2	Jakin	131	100.00%
1	Flemington	825	100.00%	2	Bainbridge	14,468	100.00%
1	Riceboro	615	100.00%	2	Attapulcus	454	100.00%
1	Midway	2,141	100.00%	2	Climax	276	100.00%
1	Richmond	16,633	100.00%	2	Donalsonville	2,833	100.00%
	Hill			2	Iron City	312	100.00%
1	Pembroke	2,513	100.00%	2	Brinson	217	100.00%
1	Bloomington	2,790	100.00%	2	Colquitt	2,001	100.00%
1	Savannah	147,780	100.00%	2	Blakely	5,371	100.00%
1	Du Pont	134	100.00%	2	Damascus	212	100.00%
1	Fargo	250	100.00%	2	Arlington	1,209	100.00%
1	Homerville	2,344	100.00%	2	Whigham	428	100.00%
1	Argyle	190	100.00%	2	Cairo	10,179	100.00%
2	Butler	1,881	100.00%	2	Pelham	3,507	100.00%
2	Reynolds	926	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 B

**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

**DEFENDANT STATE ELECTION BOARD MEMBERS' OBJECTIONS
AND RESPONSES TO PLAINTIFFS' FIRST SET OF
INTERROGATORIES**

Defendants William S. Duffey Jr., in his official capacity as Chair of the State Election Board; and Matthew Mashburn, Sara Tindall Ghazal, Edward Lindsey, and Janice Johnston, in their official capacity as members of the State Election Board (collectively, "Defendants"), file these objections and responses to Plaintiffs' First Set of Interrogatories. The answers provided are based on each member's personal knowledge about the subject matter of the interrogatory posed. Defendants state they have not been and are not involved or knowledgeable about the redistricting process in any upcoming election.

**SPECIFIC OBJECTIONS AND RESPONSES TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Interrogatory No. 1:

Identify all persons whom you know or have any reason to believe have

any knowledge about the allegations in the Complaint or the allegations and affirmative defenses in the Answer, and with respect to each individual, state with specificity the substance and basis of their knowledge.

Response No. 1:

Defendants do not know the individuals who have knowledge of the allegations of the Complaint and Answer because they were not involved in the mapdrawing process and do not know who provided information about the allegations of the Complaint.

Interrogatory No. 2:

Identify all state interests, policies, or other justifications you contend are served by or underlie SB 2EX, including but not limited to any state interests, policies, or other justifications cited by you in your motion to dismiss the Complaint, *see* ECF No. 38; your response in opposition to Plaintiffs' motion for preliminary injunction, *see* ECF No. 40; your reply in support of your motion to dismiss, *see* ECF No. 44; your proposed findings of fact and conclusions of law, *see* ECF No. 88; and the Answer.

Response No. 2:

Defendants do not have information regarding those state interests, policies, or justifications, other than those included in their prior filings, including because they were not involved in the mapdrawing process and are not aware of all state interests that may have been considered by the General

Assembly in drawing districts for any specific election.

Interrogatory No. 3:

Identify the current residential addresses of all members of Georgia's delegation to the U.S. House of Representatives.

Response No. 3:

Defendants do not know the current residential addresses of the members of the Georgia congressional delegation.

Interrogatory No. 4:

Identify the latest date by which you believe statewide districting plans (including state legislative and congressional maps) must be in place in advance of the 2024 primary elections, including any specific deadlines, requirements, or other reasons justifying this determination. Alternatively, if the date of the 2024 primary elections has not been finalized at the time these interrogatories are propounded, state the minimum number of days in advance of the 2024 primary elections that you believe statewide districting plans must be in place, including any specific deadlines, requirements, or other reasons justifying this determination.

Response No. 4:

Defendants object to the concluding language of the interrogatory which states "including any specific deadlines, requirements, or other reasons

justifying this determination” on the grounds this part of the interrogatory is vague and uncertain, and thus incapable of a response.

Subject to this objection, Defendants do not know the date by which districting plans must be in place for the 2024 election and do not have any belief about the minimum number of days in advance of the 2024 primary elections within which districting plans must be in place.

Interrogatory No. 5:

Identify all communications you have had with the General Assembly, any members of Georgia’s delegation to the U.S. House of Representatives or their staffs, any candidates for election to the U.S. House of Representatives or their staffs, or Governor Brian Kemp or his staff regarding SB 2EX, the allegations in the Complaint, the allegations and affirmative defenses in the Answer, or this litigation.

Response No. 5:

Defendants are not and were not involved in the redistricting process and have not had any conversations with the General Assembly, Governor Brian Kemp, or his staff regarding SB 2EX, the allegations in the Complaint, the allegations and affirmative defenses in the Answer, or this litigation.

Interrogatory No. 6:

Identify each person participating in the preparation of responses to these interrogatories, and for each person listed, state with specificity the

substance and basis of their knowledge.

Response No. 6:

Defendants state that the following individuals participated in preparation of these interrogatories:

1. William S. Duffey Jr., Chair of the State Election Board and, as the interrogatory answers state, he does not have information responsive to the interrogatories.
2. Sara Tindall Ghazal, member of the State Election Board, and, as the interrogatory answers state, she does not have information responsive to the interrogatories.
3. Janice Johnston, member of the State Election Board, and, as the interrogatory answers state, she does not have information responsive to the interrogatories.
4. Edward Lindsey, member of the State Election Board, and, as the interrogatory answers state, he does not have information responsive to the interrogatories.
5. Matthew Mashburn, member of the State Election Board, and, as the interrogatory answers state, he does not have information responsive to the interrogatories.
6. Counsel for Defendants, who formatted and helped administratively prepare these responses.

This 9th day of September, 2022.

Respectfully submitted,

Christopher M. Carr
Attorney General
Georgia Bar No. 112505
Bryan K. Webb
Deputy Attorney General
Georgia Bar No. 743580
Russell D. Willard
Senior Assistant Attorney General
Georgia Bar No. 760280
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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2022, I caused a copy of the foregoing to be served by electronic mail on all counsel of record.

/s/ Bryan P. Tyson

Bryan P. Tyson

Counsel for Defendants

EXHIBIT C

Pendergrass, Coakley, et al. v. Raffensperger, Brad, Et Al.

Page 1

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4

5 COAKLEY PENDERGRASS, ET AL.,)
6 PLAINTIFFS,) CIVIL ACTION NO.
7 v.) 1:21-CV-05339-SCJ
8 BRAD RAFFENSPERGER, ET AL.,)
9 DEFENDANTS.)

10
11
12
13 DEPOSITION OF WILLIAM S. COOPER
14 (TAKEN by DEFENDANTS)
15 ATTENDING VIA ZOOM IN BRISTOL, VIRGINIA
16 FEBRUARY 14, 2023
17
18
19

20 REPORTED BY: Meredith R. Schramek
21 Registered Professional Reporter
22 Notary Public
23 (Via Zoom in Mecklenburg County,
24 North Carolina)
25

1 '96 or '97, when what was sort of the tail end, I
2 think, of all that litigation.

3 Q Zooming out from Georgia to other states as
4 well, have any -- has any state ever used a
5 congressional district map that you drew in an actual
6 election?

7 A No. I've done a little bit of consultant --
8 consulting with respect to congressional plans, but
9 it's always been as part of litigation, and usually the
10 state gets the final word on that.

11 Q So let's talk a little bit more about this
12 case.

13 I know we talked about how you got involved
14 in the Alpha case last week. When did you first hear
15 about or hear from somebody about the Pendergrass case?

16 A Well, it would have been in the fall of 2021
17 after the release of the census data.

18 Q Do you recall if it was before the General
19 Assembly's special session in November of 2021?

20 A It would have been about the same time. I
21 don't think I did anything on a congressional plan
22 after the release of the 2020 census until sometime
23 probably in late November.

24 Q And I'm not asking for what you talked about,
25 but do you remember who contacted you about getting

1 expert report submitted on December 5th; is that right?

2 A Yes.

3 Q When you were drawing both the illustrative
4 plan for the preliminary injunction hearing and the
5 illustrative plan in your 12/5 report, it would be fair
6 to say your goal was to add a majority black
7 congressional district above the number drawn by the
8 General Assembly; is that right?

9 A No, that was not my goal. My goal was to
10 determine whether it was possible while, at the same
11 time, to include traditional redistricting principles.

12 Q Did you attempt to draw more than one
13 additional congressional map? I mean -- I'm sorry.
14 Let me start that over again.

15 Did you attempt to draw more than one
16 additional majority black district as part of your
17 analysis of Georgia's congressional plan?

18 MS. KHANNA: I'm going to object to the
19 extent that this calls for discussion of any draft
20 reports or draft maps which are protected under the
21 federal rules.

22 So, Bill, I'll instruct you not to answer to
23 the extent it would discuss any of the draft reports or
24 draft maps, but you can answer otherwise if you can.

25 THE WITNESS: Okay. Well, I did not attempt

1 to draw two additional majority black districts.

2 Does that answer the question?

3 BY MR. TYSON:

4 Q Yes, that does. Thank you.

5 Now, in preparing -- or I should ask this:

6 Do you know what principles the Georgia Legislature
7 used for the drawing of its congressional plans?

8 A Well, I've seen a -- there's a document
9 that's posted on the General Assembly's website that
10 identifies the factors to take into consideration. I
11 submit for both House, Senate, and congressional plans.

12 Q Did you rely on that document about the
13 principles for drawing plans when creating your
14 illustrative plans in this case?

15 A Yes. That document is pretty straightforward
16 and typical guidelines that any state would issue.

17 Q So it's typical guidelines and guidelines
18 that you relied on when preparing your illustrative
19 plans?

20 A I believe so.

21 Q All right. So, Mr. Cooper, I know we had a
22 discussion about terminology last week, but I just want
23 to for the purposes of this deposition also just kind
24 of make sure we're all clear in our definitions.

25 Do you use the term "majority black district"

1 in your drawing processes and reports?

2 A I do.

3 Q And what is your definition of a majority
4 black district?

5 A Typically, it would be majority black voting
6 age. In some circumstances, it might be majority black
7 citizen voting age according to the 2020 census for
8 majority black voting age.

9 And then if you're looking at citizen voting
10 age, it would vary over time as the American Community
11 Surveys results are released on an annual basis. So
12 over the course of a decade, that number would
13 change -- citizenship number.

14 Q And then would you distinguish a majority
15 black district from a majority minority district?

16 A Yes, I would. A majority black district
17 would be a district that is over 50 percent majority
18 any part black. And a majority minority district would
19 be a district that is over 50 percent nonwhite or not
20 non-Hispanic white.

21 Q So a majority minority district may include a
22 variety of different minority groups, but the total of
23 the various minority groups would be over 50 percent?

24 A Yes.

25 Q Have you used the term "majority opportunity

1 conclusion.

2 BY MR. TYSON:

3 Q You can answer --

4 MS. KHANNA: You can answer.

5 THE WITNESS: Well, I mean, if the goal is to
6 draw the maximum number possible, then it would
7 certainly be high priority. When I draw plans, I'm
8 always trying to balance traditional redistricting
9 principles. So I would never have that as a goal
10 unless it was just some sort of hypothetical example to
11 show what could be drawn, perhaps even showing that
12 well, it could be drawn, but it would violate
13 traditional redistricting principles.

14 BY MR. TYSON:

15 Q So it's fair to say when you're drawing a
16 map, you're taking into account a variety of different
17 considerations at any given point; right?

18 A Absolutely. Yes.

19 Q Do you know, Mr. Cooper, currently how many
20 black members of Congress are elected from Georgia?

21 A I believe that currently there are five.

22 Q All right. Well, let's turn to your report.
23 Do you have a copy there in front of you? Or would it
24 help you if I shared it on the screen?

25 A I do have a copy of my report. You may wish

1 Q And so you have your local -- your kind of
2 background knowledge that you bring, and then you said
3 you look at both census information at the county level
4 and the subcounty level.

5 How do you go about looking at census
6 information at the county level and subcounty level?

7 A Well, you can display on a computer screen as
8 you're drawing a redistricting plan the demographics of
9 a city or a precinct or block group or a census block.
10 So all of that information is available as one is
11 putting together a plan.

12 Q And while you were working on the
13 illustrative plans you created in this case, were you
14 displaying racial demographic information on the screen
15 at any point?

16 A Sometimes I had demographic information
17 displayed, either through the data view that is part of
18 the Maptitude software indicating what the population
19 is in a particular district and break out the race of
20 the component parts.

21 So I had that. And I also had precinct
22 lines. So I was able to identify precincts that had
23 significant black populations.

24 I think I mentioned in my last testimony that
25 I used sometimes little dots showing where the minority

1 population is concentrated. So I was aware of that.
2 And, really, based on previous knowledge, in some of
3 these counties like particularly Fayette County and
4 others, Gwinnett, I kind of had been through those
5 areas and so understood basically where the population
6 is even before beginning the plan.

7 Q And do you have any political data in your
8 Maptitude system or is it only racial information from
9 the Census Bureau?

10 A It's racial information along with, of
11 course, breakouts by age and ethnicity and also
12 socioeconomic data is available.

13 Q So in paragraph 10, you find you can create
14 this additional majority black congressional district,
15 and you use the term "consistent with traditional
16 redistricting principles."

17 What does the phrase "consistent with
18 traditional redistricting principles" mean?

19 A Well, it just means that it's possible to
20 draw a plan that adheres to traditional redistricting
21 plans. In other words, the districts within a plan
22 should be, for a congressional plan, perfectly equal in
23 terms of total population plus or minus zero.

24 It means that one should be aware of
25 political subdivision boundaries, respect communities

1 Q Okay. But on the illustrative plan that
2 you've presented in this case, you've changed 8 of the
3 14 districts from the enacted plan; right?

4 A Yes.

5 Q And looking at the districts that you did not
6 change, Congressional District 2 currently elects a
7 black democratic member of Congress; right?

8 A Correct.

9 Q And Congressional District 5 currently elects
10 a black democratic member of Congress; right?

11 A Correct.

12 Q And Congressional District 7 currently elects
13 a black democratic member of Congress; right?

14 A Correct.

15 Q And I believe we covered this a little
16 earlier, but there are some changes between the plan in
17 your 12/5 report and the report that you offered in the
18 preliminary injunction hearing; right?

19 A Correct.

20 Q So let's look next to the demographic profile
21 portion of your report. And maybe to make this a
22 little bit easier, Mr. Cooper, did you present the same
23 census information in this report, really from
24 paragraph 13 through paragraph 37, that you presented
25 in the Alpha Phi Alpha report minus the non-Metro

1 Figure 1, you'd agree that the change in the percentage
2 of AP black population in Georgia from 2010 to 2020 was
3 a one and a half point increase from the 2010
4 percentage to the 2020 percentage; right?

5 A We're looking at Figure 1?

6 Q Yes, sir.

7 A Yes. A lot of people. A lot of people.

8 484,000. So more than half of a congressional

9 district.

10 Q And turning to Figure 2 on page 8, you're
11 comparing the estimates of the 2020 AP black VAP, the
12 2021 citizen voting age population statistics; right?

13 A In Figure 2?

14 Q Yes. On page 8.

15 A Yes.

16 Q Okay.

17 A For the state.

18 Q For the entire state, yes.

19 And do you recall in your preliminary
20 injunction report you used the 2019 CVAP numbers?

21 A I do recall that. You pointed that out, I
22 think, the other day. So yes. I do. I do recall
23 that.

24 Q Okay. And do you recall that there had been
25 a decrease in the black citizen voting age population

1 between the 2021 CVAP number and -- I'm sorry -- the
2 2019 CVAP number and the 2021 CVAP numbers?

3 A I do, as you pointed out, and there is a
4 slight decrease but there's also a more significant
5 decrease, I believe, in non-Hispanic white CVAP over
6 that two-year period.

7 I would attribute that to increases in Latino
8 and other minority populations that have gained
9 citizenship over that two-year period or just turned 18
10 having been born in the United States.

11 Q Let's move to paragraph 35, which is the end
12 of your demographic analysis section.

13 A Yes. And this paragraph 35 is not actually
14 in my Alpha Phi Alpha declaration, of course, because
15 it's focusing on the congressional material.

16 Q Certainly. Yes. And I understand there may
17 be some -- maybe not all the information in Alpha Phi
18 Alpha is in this report as well.

19 You say: "Given the dramatic increase in
20 Georgia's black population in Metro Atlanta during this
21 century, the obvious focal point for determining
22 whether an additional majority black district can be
23 created in the state is indeed Metro Atlanta."

24 Do you see that?

25 A Yes.

1 state you analyzed in the Dwight case?

2 A Well, it was the -- this is the congressional
3 plan. So I was looking at the whole state.

4 Q Okay. And so turning to Figure 8 -- I know
5 this is a little difficult to see, but Figure 8 is
6 titled "2010 Percent Black by County - 71-County Area
7 Bounded by Green Lines."

8 Do you see that?

9 A Yes.

10 Q And do you see the 71-county area that starts
11 roughly north of Augusta in Lincoln and Wilkes County,
12 runs down to Macon, down south to Thomas and Brooks
13 Counties, and then over along the coast and back up to
14 the South Carolina border?

15 A Yes.

16 Q And that's the area you evaluated in the
17 Dwight case; is that right?

18 A Correct.

19 Q And then turning to page 27 of that report,
20 you created a majority black District 12 that joined
21 African-American communities in Macon, Augusta, and
22 Savannah in the Dwight case; right?

23 A Yes.

24 Q And in the Dwight case, you didn't look at
25 Metro Atlanta. You looked at this 71-county area in

1 South Georgia; right?

2 A That is my recollection, that that litigation
3 and that district was focused on that area.

4 Q And in this case, you didn't consider any
5 other areas of the state for an additional majority
6 black district besides Metro Atlanta as indicated in
7 your report; right?

8 A Well, that's true. Remember, in the Dwight
9 case, I was relying on 2010 census data. So even
10 though I was aware that there had been significant
11 black population growth based on census estimates in
12 2018, I was still stuck using the 2010 data for Metro
13 Atlanta.

14 Q And do you recall -- well, I guess do you
15 recall reviewing the growth in black population in
16 Metro Atlanta as part of the Dwight case? And I know
17 that was a long time ago so that may not be something
18 you remember.

19 MS. KHANNA: I'm also going to object to the
20 extent that this calls for any draft analyses in that
21 case.

22 I know we're going even farther back in your
23 memory, but you can answer if you can. But be careful
24 about disclosing anything about your draft reports or
25 draft analyses.

1 Q And for Senate District 38, a small
2 geographic area in Fulton and a small portion of Cobb
3 along the Fulton border up to Smyrna is included?

4 A Yes.

5 Q And you'd agree there are large geographic
6 areas in Senate District 39 and 38 in Fulton County
7 that are not included in illustrative District 6;
8 right?

9 A Yes.

10 Q And you'd agree those state senate districts
11 don't go down into Fayette County; right?

12 A They do not.

13 Q And they don't go as far north as Kennesaw at
14 the top of illustrative 6; right?

15 A They do not.

16 Q So I guess maybe I'm trying to understand.
17 Back in paragraph 44, you used the composition of these
18 four state senate districts to conclude that District 6
19 can be readily drawn, but it doesn't look like, aside
20 from 33 and 35, much of those state senate districts is
21 in District 6.

22 So how did you use those four state senate
23 districts to draw your conclusions about the creation
24 of illustrative District 6?

25 A Well, it's a point of departure. Obviously,

1 you've made Douglas County whole; is that right?

2 A Yes.

3 Q You've introduced a new split of Cobb by
4 bringing District 3 into Cobb County on the 12/5 plan;
5 right?

6 A That is correct.

7 Q It looks like you took part of East Cobb and
8 put it into the 11th district on the 12/5 plan as
9 compared to the PI plan; is that right?

10 A Well, yes. Yes. I included a little bit
11 less of Cobb County in the 12/5 plan or the
12 illustrative plan attached to my December 2022
13 declaration.

14 So I did not take the district as far north
15 as Acworth, for example, which I did do in the
16 preliminary injunction report. I know you had concerns
17 about that so I took your concerns into account as I
18 was drawing the illustrative plan in my December 2022
19 declaration.

20 Q And you also altered the split in Fayette
21 County, it looks like, from Fayetteville over to the
22 western side of the county; is that correct?

23 A That is correct. To -- to meet one person,
24 one vote, I had to include part of Fayette County in
25 District 6 to meet one person, one vote in District 13

1 with certainty that it's not possible, I just didn't
2 try to do that.

3 Q Do you have a plan that makes fewer changes
4 that you're planning to submit in this case?

5 A Not at this point, no.

6 Q And I believe we covered this yesterday, but
7 you didn't -- and earlier.

8 You don't use any political data at any point
9 when drafting or evaluating the illustrative plan in
10 Exhibit 1; right?

11 A I do not.

12 Q Turning over to paragraph 51 on page 22,
13 there's a list of the districts that you changed under
14 the illustrative plan.

15 Do you see that?

16 A Yes.

17 Q Of that list, is it correct that all of them
18 are currently electing Republicans except for
19 Congressional District 4 and Congressional District 13?

20 A I honestly don't know, but it's likely that
21 would be the case maybe.

22 Q Let's drop down to Figure 11, the
23 illustrative plan population summary also on page 22.
24 And this lists the total population for these
25 districts, not the voting age population for these

1 Do you see that?

2 A Yes.

3 Q And this is the illustrative plan that you've
4 submitted for the 12/5 report; right?

5 A Yes.

6 Q And so just looking at a few of the districts
7 that you changed at different points, you'd agree that
8 District 11 as it's configured connects Bartow County
9 here with North Fulton County; is that right?

10 A That is correct.

11 Q And is Bartow generally a rural county in
12 Georgia?

13 A It is exurban. And if you get up further
14 north near the Gordon County line, it's probably fairly
15 rural.

16 Q How about the portion of North Fulton in
17 District 11? Would you consider that a rural area in
18 the state?

19 A It's more urban.

20 Q And so District 11 unites some rural areas in
21 Bartow County with more urban areas in North Fulton
22 County? Is that fair?

23 A That's fair. But one could draw it
24 differently and put more of Bartow County in
25 District 14 and shift District 11 into Cherokee

1 perhaps.

2 Q But you haven't drawn that for this
3 illustrative plan; right?

4 A This is just an example. And so there would
5 be other ways to configure it, for sure.

6 Q And you'd agree, we looked earlier, there's a
7 small split geographically into Cobb County in
8 District 3; is that right?

9 A Yes.

10 Q And District 3 also includes Columbus,
11 Georgia, and Muscogee County, doesn't it?

12 A It does.

13 Q And it includes rural areas around Pike,
14 Lamar, Upson, and Meriwether Counties?

15 A Yes.

16 Q So can you identify for me in your
17 illustrative District 3 what community of interest
18 unites Columbus, Georgia, with part of Metro Atlanta
19 and West Cobb County?

20 A I want to look on a map here. You split --
21 the General Assembly split Cobb County into four
22 pieces, and I'm just trying to refresh my memory as to
23 whether -- here, it's apparent that the same general
24 area where I included part of Congressional District 3
25 is placed in even more, a larger area, is placed in

1 into Columbus?

2 A Well, the 2021 plan goes as far north as the
3 Douglas County line. And then when you get to Paulding
4 County, it becomes part of District 14. So Paulding is
5 exurban, part of Metro Atlanta. And so I have included
6 Paulding County and a bit of Cobb County, which is a
7 good fit because Paulding is clearly a growing county
8 that is closely linked with the Metro Atlanta area, and
9 it may not be as closely related to Columbus. But at
10 some point, one does have to join areas that are not
11 necessarily next-door neighbors just to find 765,000
12 people.

13 I don't think it would in any way be an issue
14 overall.

15 Q So am I hearing you correctly, then, that you
16 can't identify a specific community beyond the
17 connection between Paulding and Cobb Counties but that
18 at some point, one person, one vote means you have to
19 reach the right number of people? Is that right?

20 A Well, that is a factor, but I don't think
21 that Columbus is so different that it is problematic to
22 include that part of western Georgia with Metro
23 Atlanta, western part, along Paulding and Carroll
24 County lines there.

25 Q Do you think that's also true of the enacted

1 District 14, which combines West Cobb and Paulding with
2 areas running north?

3 A It's less of a problem, I think. Because
4 really, once you -- once you include South Cobb County
5 into District 14, you're in effect adding in Cobb
6 County -- you're placing Cobb County not only into a
7 district that includes the suburbs of Chattanooga, but
8 also into a district that is part of Appalachia. And
9 so it's quite different.

10 I think the distinction there is probably
11 greater than would be the distinction between Cobb
12 County and the Columbus area. Although Cobb County
13 does have a high mountain; right? Kennesaw Mountain is
14 a thousand feet or something like that. I'm only being
15 halfway facetious. It's not quite as mountainous as
16 some parts of existing District 14.

17 Q So just so I understand, existing District 14
18 takes in part of western Cobb County in the south part
19 of the county. Illustrative District 3 takes in part
20 of western Cobb County not quite as far south. Both
21 unite that western part of Cobb County with more rural
22 areas and other metropolitan areas.

23 What is the distinction between those two
24 decisions of how to split Cobb County that you see?

25 A Well, I sort of tried to make that

1 explanation, that there is a closer tie to Metro
2 Atlanta and the counties that are just outside of Metro
3 Atlanta, like Harris and Troup than would be the case
4 of, say, Union and Fannin in the far north.

5 Q And what is -- how are you assessing the
6 connection with Fannin and Union towards metro with
7 Heard and Troup and I'm assuming down to Columbus with
8 Metro Atlanta?

9 A Well, that's how I've drawn this plan. There
10 may be other ways to do it, but I was trying to keep
11 District 2 intact and not change it. So this was the
12 result.

13 And if it is a problem, then one could split
14 Douglas County as the existing plan does, I believe,
15 and then eliminate the need to put any part of
16 District 3 in Cobb County. There would be other ways
17 to draw it if that's truly a big issue.

18 Q So I guess I just want to make sure I
19 understand.

20 For the community of interest in illustrative
21 District 3, the community of interest that you identify
22 is that there is a closer connection between the
23 portion of West Cobb and Paulding that is included in
24 District 3 in the illustrative plan and Heard and Troup
25 Counties versus counties in North Georgia.

1 Do I have that right?

2 A The lay of the land is closer, yeah.

3 Q Okay. Are there any other communities of
4 interest you can identify connecting that portion of
5 western Cobb County to Columbus and Pike, Upson, and
6 Lamar Counties?

7 A It's a part of Metro Atlanta. So Paulding is
8 suburban, exurban. Obviously, that part of Cobb County
9 is largely suburban. And the counties to the south are
10 certainly part of Metro Atlanta. So I'm not sure what
11 the issue is.

12 But if there is an issue, there would be
13 work-arounds by just keeping District 6 roughly as it
14 is and maybe changing District 11. I mean, they're
15 just -- as I've drawn it in the illustrative plan. So
16 there would be other options.

17 Q Okay. But to be clear, you haven't drawn
18 those other options; you just believe they could be
19 drawn?

20 A I mean, there's no question they could be
21 drawn. You could just change District 11 which, in
22 turn, would change District 3 in some fashion. So
23 there is a ripple effect. But one could do that.

24 I believe, I could be mistaken, but I think
25 the total population that would be affected by this

1 Hancock and other counties, Taliaferro in eastern
2 Georgia being part of a new majority black state senate
3 district that you created in one of the other cases;
4 right?

5 A We have discussed that in the other case.

6 Q So can you tell me what the community of
7 interest is between majority black Hancock County and
8 the Appalachian Mountains and Rabun and Towns County on
9 the North Carolina border?

10 A Well, again, the connection is not very
11 strong, but one has to balance out the populations so
12 that you have 14 districts that are roughly 765,000
13 people. So, again, there would be other ways to draw
14 it.

15 Q So, Mr. Cooper, when you talked about, in
16 paragraph 48, the illustrative plan adhering to
17 traditional principles and you listed the various
18 principles, it sounds like what you're saying is
19 population equality is really the most important
20 principle even more so than being able to explain where
21 there's communities of interest between different parts
22 of districts.

23 Do I have that right?

24 A Well, actually I think you do. It's a
25 nonstarter. If it doesn't meet population equality or

1 something very close to plus or minus one, then it's a
2 nonstarter. Right?

3 Q And so then after population equality, what
4 other traditional redistricting principles explain the
5 configuration of District 10 on the illustrative plan?

6 A I was following county boundaries. I think
7 there's a split of Wilkes County. And I believe
8 Lumpkin County, but there are no other county splits I
9 believe, unless -- maybe Hall County is split.

10 But I was attempting to draw a plan that was
11 reasonably compact, reasonably shaped that -- I had the
12 information about the incumbents, I think, at maybe the
13 latter stage of drawing the plan. So I was probably
14 attempting to avoid placing a couple of incumbents who
15 live very close to one another in the Jackson County
16 area, I think. I was attempting to put them, maybe, in
17 different districts even though I understand they don't
18 have to be, I believe. I'm not looking at the
19 incumbents right now and haven't done so since
20 December.

21 Q So, Mr. Cooper, in paragraph 48, I didn't see
22 where you listed incumbents as a traditional principle
23 as part of the illustrative plan, and thought that we
24 had talked about earlier that incumbency wasn't as
25 important.

1 Did you use incumbency data in the drawing of
2 the illustrative plan?

3 A I was sort of aware of where I thought the
4 incumbents lived. It's always in the background. So
5 that was in the background.

6 Q So beyond incumbency and keeping counties
7 whole minus Hall, Lumpkin, and Wilkes Counties, and
8 population equality, are there any other traditional
9 redistricting principles that went into the districting
10 of District 10?

11 A Well, I had to make the plan reasonably
12 compact. I tried to follow county boundaries. The
13 district's contiguous. It looks as compact as the
14 districts that have been drawn in the enacted plan.
15 But it could be drawn differently.

16 Q But you'd agree that there's not a community
17 of interest between majority black Hancock County and
18 Rabun County in extreme northwest Georgia, wouldn't
19 you?

20 A They are different. They are different. And
21 so I am open to other suggestions for how one might
22 draw District 10.

23 Q And I understand they're different. My
24 question was: You'd agree there's not a community of
25 interest between Hancock and Rabun counties; right?

1 A Well, not entirely. Because most counties
2 are quite poor. And in Rabun County, you'd be talking
3 about poor whites. And in Hancock County, a fairly
4 significant black population that is not experiencing
5 prosperity. So there are connections there. There are
6 connections in that regard.

7 Q So you believe a community of interest in
8 illustrative District 10 would be poor white voters in
9 the Rabun and similar socioeconomic status black voters
10 in Hancock County?

11 A Could be. Could be. On certain
12 socioeconomic issues.

13 Q Was that the community of interest you
14 considered when you drew illustrative District 10?

15 A When I was drawing District 10, I was mainly
16 trying to avoid splitting counties and meet one person,
17 one vote requirements. And I was aware that there are
18 different areas in the sense that Rabun County is
19 Appalachian and that parts of the southern end of
20 District 10 are in the historic black belt.

21 Q And you'd agree that Athens and Clark County
22 is included in District 10 on the illustrative plan;
23 right?

24 A That's right. There's a university there.

25 Q And --

1 A So the district is a somewhat diverse
2 congressional district as I've drawn it.

3 Q You'd agree that Athens and Clark County
4 doesn't share the same socioeconomic conditions as
5 Hancock and Rabun Counties; right?

6 A Generally speaking, the population in Clark
7 County is better off socioeconomically than Rabun and
8 Hancock.

9 And one can say the same thing about the
10 population in Cobb County versus the population in
11 parts of North Georgia.

12 Q I'm not sure I follow you. I'm sorry.

13 A Well, there's -- there are probably areas
14 along the Tennessee line that are quite challenged
15 economically and very different, once you get away from
16 the suburbs of Chattanooga, than the southwest part of
17 Cobb County, which is exurban, suburban, and,
18 relatively speaking, prosperous.

19 Q Did you review any socioeconomic data about
20 counties along the Tennessee border in the drafting of
21 your illustrative District 14?

22 A I did not. Part of that is the
23 North Carolina border. But I almost don't need to do.
24 I'm familiar with Appalachia.

25 Q Looking at District 13, are you aware that

1 District 13 in Clayton County begins near the Atlanta
2 airport as you've drawn it?

3 A Yes.

4 Q And you'd agree that Butts and Jasper
5 Counties on the eastern side of District 13 as drawn
6 are rural counties; right?

7 A They are rural, but still part of Metro
8 Atlanta. In other words, the Census Bureau has
9 determined that there's a 29-county area where there
10 are commuting and transportation ties that are
11 significant enough to put those counties into Metro
12 Atlanta.

13 Q But you agree that District 13 as drawn
14 connects urban areas in Clayton County with rural areas
15 in Fayette, Spalding, Butts, and Jasper Counties;
16 right?

17 A Yes.

18 Q Are you aware that the only majority black
19 portions of any county in District 13 as drawn is the
20 portions in Clayton and Newton Counties?

21 A Well, there's obviously black population and
22 significant black population in some of the other
23 counties. Henry County is almost majority black. It's
24 50/50. And the black population is growing. Fayette
25 County has a significant black population that is

1 Q VAP, yes. Voting age population.

2 And Douglas is, like Henry, majority in total
3 population but below majority on voting age population
4 as a whole; right?

5 A As a whole. Barely below.

6 Q Yes. And the Fayette portion that's included
7 in illustrative District 6 is a total of 4,143 people;
8 is that right?

9 A Correct.

10 Q And it's only 21.73 percent black VAP?

11 A Correct.

12 Q So the only portion of a county in
13 illustrative District 6 that is majority black voting
14 age population is the Fulton County portion at
15 88.29 percent; is that right?

16 A Yes. But as I referenced, Douglas County is
17 almost 50 percent. And so is Henry County.

18 Q Based on looking at this --

19 A I'm sorry. I was referencing District 13,
20 not District 6. Excuse me.

21 Q Looking at this report for District 6, you'd
22 agree that making District 6 a majority black district
23 on voting age population requires the population in
24 Fulton County; right?

25 A It would -- it does include a significant

1 piece of Fulton County.

2 Q And my question was a little different, which
3 is --

4 A That's already in majority black districts,
5 but I did shift it from District 13 into District 6.

6 Q And you shifted the portion of Fulton from
7 District 13 into District 6. And without that portion
8 of Fulton, the district would not be majority black
9 from the remaining components of the district,
10 including Cobb County; right?

11 A As drawn, that's true.

12 Q Let's return back to your main report.

13 MR. TYSON: Is everybody still good? We've
14 been going about an hour. Do we want to take one more
15 quick break? I've got a little ways to go but not much
16 more.

17 (Discussion off the record.)

18 BY MR. TYSON:

19 Q So, Mr. Cooper, let's move to page 26 of your
20 report that focuses on the communities of interest that
21 you reference here.

22 Are you with me on that?

23 A Page 26. Okay.

24 Q So in paragraph 65, you reference the three
25 Cobb County splits or three pieces of Cobb County in

1 have 765,000 people. So it's not just in Georgia, it's
2 in any state you're going to sometimes have to include
3 urban and rural voters in a congressional plan no
4 matter whether you like doing so or not.

5 Q And you'd agree illustrative District 10
6 mixes Appalachian North Georgia with parts of the black
7 belt in Eastern Georgia; right?

8 A It does. It does.

9 Q And you reference Douglas, Fulton, and
10 Fayette Counties being core Metro Atlanta counties in
11 the Atlanta Regional Commission in paragraph 68.

12 Do you see that?

13 A Yeah.

14 Q And is Coweta County also a core Metro
15 Atlanta county under the Atlanta Regional Commission?

16 A I'm not sure. There are 11 counties and I'm
17 not sure Coweta is part of it.

18 Q Are you aware that Coweta County touches
19 Douglas, Fulton, and Fayette Counties?

20 A Yes.

21 Q And you put Coweta County in a district with
22 Columbus, Georgia, on the illustrative plan; right?

23 A I did, yes. Is that bad?

24 Q I guess what I'm trying to understand is
25 you're criticizing the enacted plan for mixing

EXHIBIT D

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

GEORGIA STATE CONFERENCE OF) No.
NAACP, et al.,) 1:21-CV-5338-ELB-SCJ-
) SDG
Plaintiff,)
)
vs.)
)
STATE OF GEORGIA, et al.,)
)
Defendant.)
_____)

VIDEOTAPED 30(b)(6) and 30(b)(1) DEPOSITION OF
LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE
(MS. GINA WRIGHT)
January 26, 2023
9:17 a.m.
18 Capitol Square SW
Atlanta, Georgia

Reported by: Marcella Daughtry, RPR, RMR
CA CSR 14315
GA No. 6595-1471-3597-5424

1 Q In September?

2 A No.

3 Q In October?

4 A Possibly. October sounds -- maybe.

5 Q Late October?

6 A It had to be in that time window because it's a
7 narrow time window, so maybe October.

8 Q Late October?

9 A I couldn't say specifically.

10 Q Do you recall if it was closer to when the
11 September 27th map was made public or was it closer to
12 when the ultimately enacted map was made public?

13 A I don't think it was close to the
14 September time frame, but I don't know exactly the date.

15 Q Do you remember, what did you guys talk about?

16 A The Congressional map.

17 Q Who was at the meeting?

18 A The -- the names I gave you previously.

19 Q So just to be clear, you had a meeting with --
20 about the Congressional map at some time closer to the
21 enacted map's publication with Chairmans Kennedy, Rich,
22 Mr. Tyson, Speaker Ralston, Lieutenant Governor Duncan,
23 and staff of the Speaker and Lieutenant Governor?

24 A That's correct.

25 Q Do you remember how many staff?

1 A No. I was in my office on a Zoom call and I
2 was not in the actual room with them, so I don't know who
3 all was in the room.

4 Q Was everyone -- maybe you don't know this, but
5 was everyone else in a single room and you were on the
6 video?

7 A I can't say that everyone. Most of them were
8 in a single room. I don't recall there being someone
9 else on the Zoom call, but...

10 Q Was -- was a map projected when that was taking
11 place?

12 A Yes.

13 Q Did you have the ability to change the map's
14 composition when that occurred?

15 A Yes.

16 Q Did anyone on that call ask you to make changes
17 to the lines at that time?

18 A Yes. We worked on adjusting the map during
19 that call.

20 Q It was a working session?

21 A Yes.

22 Q And changes were made?

23 A Yes.

24 Q At the direction of Chairman Ralston?

25 A Speaker Ralston?

1 Q I apologize. Excuse me. At the direction of
2 Speaker Ralston?

3 A Yes. I think there was a group discussion
4 about things. I don't know that it was a single person
5 who said do this, but...

6 Q Somebody on the other side of the Zoom --

7 A Uh-huh.

8 Q -- gave you an instruction about how the
9 composition lines would look and you followed it?

10 A Yes. We would try different scenarios.

11 Q I just want to understand what you are saying.
12 So would it be fair to say that it was difficult to
13 discern who was in charge of that instruction, but it was
14 someone on the other side of the call?

15 A It's not difficult to discern, but there was
16 discussion happening.

17 Q I see.

18 A So as listening to the discussion, I would then
19 attempt to try and create a sample of what it was that
20 they were looking to see.

21 Q So it was a collaborative process amongst the
22 people on that Zoom call?

23 A Yes.

24 Q Are you aware of how the individuals on the
25 Zoom call obtained -- you know, built their opinions

1 Q When you had the conversations when the map was
2 projected onto the screen, was it within Maptitude?

3 A If I'm looking at the map, it would have been
4 in Maptitude.

5 Q Okay. And you know how to use Maptitude?

6 A Yes.

7 Q Was data projected onto the screen?

8 A Sometimes it may have been. Not all the time.

9 Q Why would you look at a map without any data
10 related to it?

11 A You are just reviewing the geography. You
12 wouldn't necessarily be looking at the data. You are
13 looking at the composition of districts, the counties,
14 precincts and things.

15 Q When data was projected onto the screen, what
16 type of data was it?

17 A Typically, our data would include the total
18 population, the deviation, the percent deviation, voting
19 age population. Most of the fields that you see on our
20 population summary reports would be also included on
21 there, as well as political data.

22 Q I recall that there's data related to the race
23 of the population on those summary reports.

24 A Correct.

25 Q Was data related to the race of the populations

1 projected onto the screen?

2 A It could have been sometimes.

3 Q Most of the time?

4 A Most of the time. We usually projected all the
5 race data that we would use on the reports, as well as
6 the political data that they were reviewing. So both
7 together.

8 Q Was that data relevant to you making -- I'll
9 rephrase.

10 Did Chairman Kennedy consider that data when
11 making instructions about how to draw the lines?

12 A I would assume he did. I don't know what
13 Chairman Kennedy considered.

14 Q Was it sort of a collaborative conversation or
15 was it really just Chairman Kennedy giving you
16 instructions and you following them?

17 A Can you explain what you mean by that?

18 Q Yeah. I can imagine that Chairman Kennedy told
19 you you need to move this line in southeast Georgia and
20 then you did it. Or Chairman Kennedy could say, what
21 would happen if I moved -- you moved this line in
22 southeast Georgia? You could say, well, Chairman, this
23 or that.

24 A I'd say it's more like the second scenario.

25 Q Okay. What type of questions did he ask you?

1 Q Well, so -- sure. Let me rephrase.

2 You referred to having a working session with
3 Chairman Kennedy, Mr. Tyson, Ms. Paradise about the State
4 Senate map. Am I recalling that?

5 A Right. Well, we would have had several
6 meetings where we discussed the map. There wasn't one
7 session where we had other multiple senators involved at
8 the same time that I recall. So the Senate was a little
9 different in that respect.

10 Q You met with Chairman Rich regarding the State
11 Senate map?

12 A Yes.

13 Q Was it the same type of process that you had
14 with Senator Kennedy, where you had a blind map and then
15 you reviewed it with her?

16 A Yes.

17 Q And then she, as the sponsor of the map, would
18 either direct you to make changes or bring in other
19 members of the House who would make directions for
20 changes?

21 A Yes. It was my understanding both chairmen
22 were meeting with members and had opened up office time
23 and meeting time to take input from the members about the
24 map and their districts. And I don't know how many
25 members each of them met with, but they did have those

1 meetings and that frame of reference. So that when we
2 met together, they could use those meetings and the input
3 they received from members to make adjustments if the --
4 if the draft didn't look -- if they felt like this member
5 had requested this and we weren't -- if we could
6 accommodate things, we would try to accommodate those
7 things.

8 Q But you weren't involved in those meetings?

9 A I was not.

10 Q Was anyone in your office involved in those
11 meetings?

12 A No.

13 Q You just knew they existed?

14 A Right.

15 Q Would Chairman Rich mention them to you?

16 A Yes.

17 Q Sometimes specific meetings?

18 A Maybe.

19 Q Yeah.

20 We've been going about an hour, I think. Would
21 this be a good time to maybe take a 15-minute break?

22 A I'm -- whatever.

23 THE WITNESS: Patrick?

24 MR. JAUGSTETTER: Sure.

25 MR. CANTER: Thank you.

1 recommended to add to 6 on that.

2 Q What do you mean by "e-mail list"?

3 A We talked about that. I had an e-mail from his
4 staff.

5 Q Oh, I see.

6 A It was in the documents somewhere.

7 Q I understand. So there was an e-mail from the
8 staff of Chairman Kennedy?

9 A Chairman Kennedy, uh-huh, on his behalf.

10 Q And the e-mail -- and I know I'm partly
11 paraphrasing here -- but roughly said, hey, here are some
12 things we would like you to do for your blind map?

13 A Right. Well, they didn't call that a blind
14 map, but here's some things we'd like to try on a
15 Congressional map.

16 Q Do you know why Senator Kennedy's staff wanted
17 to try adding Forsyth into CD 6?

18 A The desire for district -- or for congressional
19 District 6 was to make it a more politically electable
20 district.

21 Q Politically electable for whom?

22 A For the party of the people who were drawing
23 the map.

24 Q How was that information conveyed to you?

25 A It is obvious to me, but, I mean, I don't -- I

1 don't -- that discussion I think was had at some point.

2 Q Sorry. Sorry.

3 A I don't --

4 Q That question --

5 A -- have a specific --

6 Q Yeah.

7 A -- moment.

8 Q What makes it -- what makes it obvious to you?

9 A Forsyth County tends to vote Republican. It
10 was a political decision.

11 Q If you are gonna add Forsyth County, you are
12 going to have to take away something else. Is that
13 right?

14 A Right. So as the map from the bottom -- of
15 course, we have mentioned south Georgia's loss of
16 population, those three congressional districts across
17 the bottom, and I think even District 12 had a loss of
18 population or were below in population. They had to
19 reach upward. It sort of pushed the entire map. It did
20 this on all three. The effects of that on all three maps
21 pushed things northward.

22 So some districts around the middle and in the
23 upper parts in the Metro area were gonna get shifted
24 further up to where the population was. So the growth in
25 population there added into District 6 also gave -- met

1 Q So is there racial data at the block level?

2 A Yes.

3 Q All right. Is there any other type of demo --
4 data at the block level?

5 A So when we build our precinct layer, we do
6 allocate the election data to the block level, so we have
7 that political data at that level. It's estimating,
8 based on the demographics in there, based on registered
9 voter demographics kind of corresponds the two and
10 allocates down to that level. So we do have estimate
11 political data at the block level when we do this.

12 Q When you are drawing a map and you are looking
13 at the block level --

14 A Uh-huh.

15 Q -- is data reflected on the screen?

16 A Yes.

17 Q And is the estimated election data on the
18 screen with the other data?

19 A Yes.

20 Q You agree that the line we're looking at here
21 splits through the precinct, right?

22 A At the time, Newton County was considering
23 precinct changes. We were working with several -- their
24 elections office, and we had a draft precinct layer that
25 they were considering, so it's possible that I referred

1 Q -- was a logical choice if the consequence
2 would be to split Cobb, which already was split?

3 A Correct.

4 Q So it was a good idea in this circumstance to
5 split Cobb into four?

6 A There were the political justifications for why
7 they chose to do that. That's the reasoning behind that
8 split, why that was put into the 14th District.

9 Had they chosen a different route, that
10 particular area, as I said, was a strongly democratic
11 voting area, and putting that into the 11th District
12 would have reduced the Republican numbers in the 11th
13 District. The 14th District was a stronger Republican
14 district, so therefore, adding that democratic area into
15 a more Republican performing district was not going to
16 make as big of an impact on the 14th as it would on the
17 11th.

18 Q And those were political considerations that
19 you were -- that were conveyed to you?

20 A Well, yes, that was what the -- you can look at
21 the numbers in the data and see.

22 Q But you're -- you're a demographer, right? Or
23 you draw maps a lot, right?

24 A I've been called that, yes.

25 Q Yeah, yeah. Yeah, you draw maps a lot.

1 A Well, as I mentioned earlier, the inclusion of
2 an educational video, that was actually my idea. I
3 wanted to provide the people who cared enough to come out
4 to the public hearings the opportunity to learn a little
5 bit about the process, rather than just come up and talk
6 about things without knowing some of the detail or the
7 reasons why we do this. So that video was a new feature
8 to add.

9 I also -- I don't know if related to the
10 hearings, per se, the Zoom platform is new. We didn't
11 have that before. We have two public hearings on Zoom at
12 this time. That was definitely not something we did ten
13 years before. To allow people to not just watch but also
14 participate from -- from that platform.

15 I think all of the public hearings were
16 streamed at this time, and I don't know that they were in
17 2011. They may have been recorded, but I don't know that
18 they were streamed to be able to watch it live as it was
19 taking place. So that was new this time.

20 And the comment portal we had on the website
21 was also a new feature at this time, to allow people to
22 submit comments, and those comments are actually posted
23 so that they were viewable throughout the whole process.
24 I think the comment portal was left up until through the
25 end of the year, even following the adoption of the maps.

1 And it actually might still be there now. I'm not even a
2 hundred percent sure if it's still active, but it might
3 be still active now, not to submit, but to at least
4 review comments.

5 So all of those things were new in 2021 that we
6 did not do or have the ability to do in 2011.

7 Q Do you recall if the special session timeline
8 was similar in 2011 to 2021, the actual time in special
9 session?

10 A 2011, the special session was in the summer.
11 It was August, I believe. It was around maybe two, two
12 and a half weeks. It was a relatively short time period.
13 I mean, it was, like I said, in the summer. So 2021, we
14 were in session. Maybe -- I don't know if it was exact.
15 Maybe a little longer than that or around that time
16 period, but it was in November as opposed to August, so
17 much later in the year.

18 Q Okay. What was generally your role in the
19 redistricting process in 2011?

20 A Similar to what it was this time. I worked on
21 drawing those maps, worked with the legislators to draw
22 the -- the statewide maps for the Senate and
23 Congressional and a large portion of the House map in
24 2011.

25 Q Did you follow a similar process in drawing the

1 A Traditionally, we renumber the House plan
2 following finalizing a map. And it follows a pattern
3 from the top left, moving towards the bottom right,
4 trying to, number one, if I can maintain the same
5 district numbers that were there previously, that does
6 help with a lot of things in the counties for the
7 elections, and also for the members. But I renumber to
8 try and keep delegations in similar numbering patterns
9 and things like that as it moves through. It's not a
10 perfect science, but that is traditionally what we do in
11 the House.

12 Q So is it unusual for House District numbers to
13 change for Georgia voters following a Census and a redraw
14 of the maps?

15 A No, that's not unusual.

16 Q You talked to Mr. Canter a little bit about the
17 political data that you had available and the process of,
18 I guess, disaggregating or imputing that data to blocks.

19 Do you recall that?

20 A Yes.

21 Q And so is it correct then that if you were
22 looking at Census block data, each Census block has
23 political data in it even though it's an estimate, right?

24 A Right. As you move blocks, you would see a
25 change in not just demographic data but also in political

1 data as you move those blocks.

2 Q And when drawing the maps, you talked about
3 different meetings with groups. Let's start with the --
4 the Senate groups that you met with. Was the political
5 data for each district an important consideration for the
6 members when they were drawing the maps?

7 A Yes.

8 Q And for the House maps, was that also -- was
9 political data also an important consideration?

10 A Yes.

11 Q And for the congressional maps in that
12 leadership meeting, was political data an important
13 consideration?

14 A Yes.

15 Q Mr. Canter talked with you about the -- the
16 different factors of redistricting that the committee
17 adopted.

18 Do you recall that?

19 A Yes.

20 Q Can you just describe briefly, as a map drawer,
21 how do you go about trying to balance -- because I'm
22 assuming there is a competing interest between a lot of
23 those different factors. How do you go about approaching
24 balancing those different factors?

25 A It's very difficult, and in certain situations

EXHIBIT E

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

GEORGIA STATE CONFERENCE OF) No.
NAACP, et al.,) 1:21-CV-5338-ELB-SCJ-
) SDG
Plaintiff,)
)
vs.)
)
STATE OF GEORGIA, et al.,)
)
Defendant.)
_____)

VIDEOTAPED 30(b)(6) and 30(b)(1) DEPOSITION OF
SENATE REDISTRICTING & REAPPORTIONMENT COMMITTEE

(MR. JOHN F. KENNEDY)

January 20, 2023

9:03 a.m.

18 Capitol Square SW
Atlanta, Georgia

Reported by: Marcella Daughtry, RPR, RMR
CA CSR 14315
GA No. 6595-1471-3597-5424

1 Q Were the Senate Committee guidelines approved
2 on August 30, 2021?

3 A I don't remember the date, but that sounds
4 about right.

5 Q What role did you have in creating the
6 redistricting guidelines?

7 A If I remember correctly, these are the same
8 principles that were utilized in the last redistricting
9 cycle. So I would have lifted them, if you will, from
10 that and utilized them and placed them with our materials
11 for presentation to the committee for consideration of
12 what the plans, or the principles for drafting plans
13 should be for our current cycle.

14 Q What is your understanding of -- sorry, could
15 you read the principle number 3, please?

16 A "All plans adopted by the Committee will comply
17 with Section 2 of the Voting Rights Act of 1965, as
18 amended."

19 Q And what is your understanding of this
20 principle?

21 A I would have relied upon counsel to advise us
22 as to what, one, we should do to make sure we're in
23 compliance.

24 Q How did you ensure the Senate Committee
25 complied with this principle?

1 passed -- excuse me. I don't have the map that was
2 passed committed to memory, so I can't answer that.

3 Q When did you first see -- let's just assume
4 that this is S.B. 2EX, which was enacted.

5 A Okay.

6 Q When did you first see this proposed map?

7 A I don't remember.

8 Q To your knowledge, who drew this map?

9 A I believe it would be Gina Wright.

10 Q Do you know whether this map took into account
11 submission -- into account public feedback?

12 A I couldn't --

13 Q Do you know whether this map took into account
14 public feedback?

15 A The mapping process included a lot of feedback
16 from the public, including the town hall meetings, the
17 receipt of information, the committee hearings which were
18 public in which the public was invited to. All of that
19 process fed into what was ultimately this map, so I would
20 answer your question that way.

21 Q Did you have any role in drawing any part of
22 this map?

23 A And by way of reminder, this is the one that we
24 passed?

25 Q Correct.

1 (Deposition Exhibit 13 was marked for
2 identification.)

3 THE WITNESS: So tab 11, Exhibit 13?

4 Q BY MR. GENBERG: Yes.

5 A Okay.

6 Q What does this appear to be after you read it?

7 A It appears to be a press release sent out on
8 behalf of or, presumably, at the request of myself as
9 chair of the Senate Redistricting Committee and
10 Representative Bonnie Rich, chair of the House
11 Redistricting Committee, identifying the dates and
12 locations of town hall meetings and that we would have
13 such meetings for the public for the purpose of receiving
14 public input on the redistricting process.

15 And my exhibit behind tab 11 is two pages, but
16 the second page is -- is blank except for just some small
17 print text at the top, so I don't know if I'm supposed to
18 have more on that page or not.

19 Q Do you see that the date, Monday, August 30,
20 2021, is crossed out for the Augusta hearing, and then in
21 parentheses it says, "Rescheduled to an earlier date -
22 August 11th"?

23 A Yes.

24 Q Do you have an understanding why that town hall
25 was changed from August 30th to August 11th?

1 A No, except I do remember one of the -- the
2 hearing dates and the town hall meetings were impacted, I
3 believe by a storm that came through and necessitated the
4 cancellation of one of our town hall meetings, and that
5 may have had -- have impacted, caused in whole or in part
6 this reshuffling that you are seeing on that. I just
7 don't remember enough about the specific dates.

8 That's the only thing that comes to mind as to
9 why some things had to be rescheduled. It could have
10 been other reasons, though.

11 Q Okay. We can take a break.

12 A Okay.

13 THE VIDEOGRAPHER: The time is 4:28 p.m. We
14 are now off the record.

15 (The deposition was at recess from 4:28 p.m. to
16 4:49 p.m.)

17 THE VIDEOGRAPHER: The time is 4:49 p.m., and
18 we are back on the record.

19 Q BY MR. GENBERG: Senator Kennedy, do you have
20 anything else to say that bears on the topics noticed in
21 the Senate Committee subpoena that we have not discussed?

22 A Well, I think I came here to answer your
23 questions, is how I would answer that, and nothing comes
24 to mind. I'm happy to answer questions that you pose. I
25 think that's the only way I can answer that. I'm happy

EXHIBIT F

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

Georgia State Conference
of the NAACP; Georgia
Collation for the People's
Agenda, Inc; Galeo Latino
Community Development Fund,
Inc.,

Plaintiffs,

vs.

CIVIL ACTION FILE NO.
1:21-CV-5338-ELB-SCJ-SDG

STATE OF GEORGIA; BRIAN KEMP,
IN HIS OFFICIAL CAPACITY AS
THE GOVERNOR OF THE STATE OF
Georgia; Brad Raffensperger,
in his official capacity as
the secretary of State of
Georgia,

Defendants.

VIDEOTAPED HYBRID ZOOM
30(b)(6) and 30(b)(1)
DEPOSITION OF
BONNIE RICH
January 18, 2023
9:11 A.M.

18 Capitol Square SW
Atlanta, Georgia
Lee Ann Barnes (via Zoom), CCR-1852B, RPR, CRR, CRC

1 A. I did.

2 Q. And I believe you said earlier, the
3 Democratic members except for a handful of them
4 didn't show up for meetings or try to meet with you.

5 A. Correct.

6 Q. And there was a portal that was made to
7 receive public comments as well?

8 A. Yes, that's correct.

9 Q. And you received, I guess, hundreds of
10 comments at that portal?

11 A. I think at last count it was in the 900s
12 and I thought it went over 1,000.

13 Q. And all those were made available to
14 members to review; right?

15 A. Yes.

16 Q. And you -- you reviewed those comments, as
17 you said?

18 A. Yes, I did.

19 Q. And we had some discussion about the
20 education data the committees hold.

21 Do you recall inviting a variety of
22 different groups interested in redistricting?

23 A. I did.

24 Q. In both political parties?

25 A. Yes, both parties.

1 Q. And the National Conference of State
2 Legislatures?

3 A. That is correct.

4 Q. And the guidelines for the committee were
5 adopted after that educational process; is that
6 right?

7 A. That is correct.

8 Q. In the map drawing process, I know you
9 talked about you primarily did that in the
10 Reapportionment Office with Ms. Wright or with
11 Mr. Knight; right?

12 A. Correct.

13 Q. Was political data generally displayed as
14 you looked at different districts?

15 A. The political data, if you mean the
16 election results, yes.

17 Q. And so it's fair to say you were aware of
18 the partisan impact of district lines and you looked
19 at various drafts?

20 A. Yes.

21 Q. When you held the committee meetings
22 during the special session, did you generally
23 receive public comment at those meetings as well?

24 A. I -- I did not at the very first meeting
25 where Leader Beverly and I both presented our maps

EXHIBIT G

Grant, Annie Lois, et al.v. Raffensperger, Brad, Et Al.

Page 1

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

ANNIE LOIS GRANT, et al.,)
Plaintiffs,) CIVIL ACTION FILE NO.
v.) 1:22-CV-00122-SCJ
BRAD RAFFENSPERGER, in his)
official capacity as the)
Georgia Secretary of State,)
et al.,)
Defendants.)

COAKLEY PENDERGRASS, et al.,)
Plaintiffs,)
v.) CIVIL ACTION FILE NO.
BRAD RAFFENSPERGER, et al.,) 1:21-CV-05339-SCJ
Defendants.)

The DEPOSITION of:

TRIANA ARNOLD JAMES

Being taken pursuant to stipulations herein:

Before Kathryn Taylor, CCR

WEDNESDAY, DECEMBER 7, 2022 | Commencing at 4:00 p.m.

All parties, including the court reporter, appeared by
videoconference.

Job No. 5609351

Page 1

1 MR. JONES: And, again, we're going to stand
2 on that objection because as you know, Bryan, work
3 product protection extends to documents that are
4 created by a party or its representative for use
5 in litigation or anticipated litigation.

6 BY MR. JACOUTOT:

7 Q. Okay. I might circle back. We can move on
8 for now.

9 Okay. Let's go to your background a little
10 bit, Ms. James. Can you give me your full name and
11 current address?

12 A. Triana Arnold James, [REDACTED]
13 [REDACTED], Villa Rica, Georgia 30180.

14 Q. And Villa Rica, is that Douglas County?

15 A. Yes.

16 Q. Okay. And how long have you lived at that
17 address?

18 A. I purchased my house in 2015.

19 Q. And have you lived there as your primary
20 residence since then?

21 A. Yes.

22 Q. Did you have any sort of secondary
23 residences, maybe rental properties or a second home at
24 that time?

25 A. In 2015?

1 keep them in a separate bucket.

2 MR. JONES: That's fine.

3 BY MR. JACOUTOT:

4 Q. Ms. James, sorry for that digression there.

5 Are you registered to vote in Georgia?

6 A. Yes.

7 Q. And where did you register to vote?

8 A. In Douglas County, state of Georgia.

9 Q. Okay. Were you registered also previously in
10 Cobb County when you lived there?

11 A. Yes.

12 Q. Okay. And what district did you reside in
13 for -- well, if you -- if you recall, do you know what
14 the senate district and house district, state house
15 district -- well, let me -- let me keep those separate.

16 So do you recall what senate district you
17 resided in prior to the recent redistricting?

18 A. In -- not U.S., but -- but state?

19 Q. Yes, state senate. Thank you.

20 A. I was in the 30th.

21 Q. Okay. And do you recall what house -- state
22 house district you resided in before the recent
23 redistricting?

24 A. The 67th.

25 Q. Okay. Have you voted in each election since

1 you've been registered to vote here in Georgia?

2 A. Yes.

3 Q. Okay. Would you include primaries along with
4 the -- with the -- with that answer?

5 A. Yes.

6 Q. Okay. Do you recall what precinct you voted
7 in in the November 2022 elections? So that would be
8 the elections that just occurred.

9 A. I don't know the precinct number, but
10 location --

11 Q. Yeah, sure. Do you -- do you know the
12 location?

13 A. Mirror -- Mirror Lake. Mirror Lake
14 Elementary.

15 Q. Now, I know you -- as a result of your
16 military service, you've lived in different states
17 periodically. Have you ever voted in any other state
18 outside of Georgia?

19 A. No. Never.

20 Q. Okay. So do you consider yourself to be a
21 member of the Democratic Party?

22 A. Yes.

23 Q. Where would you say you'd be -- would
24 start -- strike that.

25 When would you say you became a member of the

1 Q. Do you remember who that was?

2 A. Yes.

3 Q. Do you remember when that was?

4 A. The -- the last -- this last election, yes.

5 Q. Okay. Do you feel comfortable saying who
6 that Republican was?

7 A. No.

8 Q. Okay. Have you ever been a member or held a
9 position in any other political party, apart from the
10 Democratic Party?

11 A. No.

12 Q. And have you ever yourself run for office?

13 A. Yes.

14 Q. And when was that? Well, let's -- let me
15 rephrase that question.

16 When -- how many times have you run for
17 office?

18 A. Twice.

19 Q. And starting with -- I guess we'll just go
20 chronologically back from now. What office did you run
21 for most recently and when was that?

22 A. I guess, 2021.

23 Q. 2021?

24 A. No, no, no, I'm sorry. I -- I guess
25 2020/2021, I ran for senate.

1 Q. Would that be U.S. senate or state senate?

2 A. State.

3 Q. And what district did you run in?

4 A. 30.

5 Q. Okay. Did you run in the Democratic primary?

6 A. Yes.

7 Q. Okay. Were you successful in that primary?

8 A. No.

9 Q. Okay. And so the -- the office you ran for
10 before Senate 30, what office was that?

11 A. Lieutenant governor.

12 Q. Okay. And when was that?

13 A. 2018.

14 Q. Okay. And did you also run in the Democratic
15 primary for that election?

16 A. Yes.

17 Q. Were you successful in that primary?

18 A. No.

19 Q. Okay. Any other offices? I know you said
20 only two, but just -- you know, if that jogs your
21 memory or anything.

22 A. No.

23 Q. Okay. Now, apart from Georgia NOW, are you
24 involved in any voter advocacy groups?

25 A. No.

EXHIBIT H

Pendergrass, Coakley, et al. v. Raffensperger, Brad, Et Al.

Page 1

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

COAKLEY PENDERGRASS, et al.,)
)
Plaintiffs,)
)
v.) CIVIL ACTION FILE NO.
)
BRAD RAFFENSPERGER, et al.,) 1:21-CV-05339-SCJ
)
Defendants.)

The DEPOSITION of:

COAKLEY PENDERGRASS

Being taken pursuant to stipulations herein:

Before Kathryn Taylor, CCR

THURSDAY, DECEMBER 15, 2022

Commencing at 3:00 p.m.

All parties, including the court reporter, appeared by
videoconference.

Job No. 5623315

Page 1

1 A. Yes.

2 Q. Thank you. And did those documents help
3 refresh your recollection as to the events that you
4 will testify to here today?

5 A. Yes.

6 Q. All right. And do you have any documents or
7 notes with you today?

8 A. No, I don't.

9 Q. And do you have any notes or memos or other
10 documents that relate in any way to this case?

11 A. I do not.

12 Q. All right. Moving on, we will talk a little
13 bit about your background.

14 Can you please state your full name again for
15 the record, and your current address?

16 A. My name is Coakley Purdy, P-u-r-d-y,
17 Pendergrass. That was my grandfather's name, so don't
18 laugh at me.

19 Q. I'm not laughing. I think it's a really
20 unique name.

21 And what's your current address?

22 A. [REDACTED], Marietta, Georgia [REDACTED]

23 Q. And since we're appearing virtually today,
24 where are you testifying from?

25 A. From my home at [REDACTED].

1 Q. Thank you. And how long have you lived at
2 that address?

3 A. Twenty-plus years.

4 Q. And how long have you lived in Cobb County?

5 A. I'd say twenty-five -- twenty-five-plus
6 years.

7 Q. What about the state of Georgia?

8 A. Twenty-five-plus years.

9 Q. And what was that other Cobb County address?

10 A. I don't remember. I'm sorry.

11 Q. That's okay. And, again, my questions aren't
12 to confuse you. So if you don't know the answer to one
13 of my questions, saying "I don't know," is a perfectly
14 fine answer.

15 A. Thank you.

16 Q. Have you ever resided in any other county in
17 Georgia?

18 A. No.

19 Q. Have you ever resided in any other state?

20 A. Yes.

21 Q. And what states would that be?

22 A. New York.

23 Q. Is that where you are originally from?

24 A. No. I was born and raised between New York
25 and South Carolina.

1 A. Yes.

2 Q. Of course I know the big chicken.

3 A. Okay. Yeah, they moved it from Whitlock over
4 to that area. That's now the main voting area. You're
5 familiar -- are you -- okay. So you are familiar with
6 our area.

7 Q. A little bit. I moved here in 2016, so . . .

8 A. Yes, yes.

9 Q. All right. And how about the runoff? Did
10 you vote in the same location?

11 A. No. The runoff, that would -- that would --
12 early voting was at the Whitlock office.

13 Q. Okay.

14 A. And I voted early and -- and try to do my
15 duty. Civics 101.

16 Q. All right. Moving on to your political
17 affiliations. Do you consider yourself to be a member
18 of the Democratic Party?

19 A. I do.

20 Q. Do you know when you became a member of the
21 Democratic Party?

22 A. No. I don't know exactly when, no.

23 Q. Has it been since you started voting?

24 A. Yeah.

25 Q. Okay.

1 A. Yes. Since I started voting, yes.

2 Q. Okay. And have you held any leadership
3 positions in the Democratic Party?

4 A. In the -- yes. I have been a state committee
5 member for the Democratic Party. I have been vice
6 president of the Cobb County Democratic Committee, I
7 have been vice president of the Democratic Party of
8 Georgia, Georgia's African American Caucus.

9 Q. All right. So -- and with your state
10 committee member position, what years would that have
11 been?

12 A. My -- I was replaced this year, so it would
13 have been for the last six years.

14 Q. So would that have been 2016?

15 A. Yes.

16 Q. Okay. Lawyers are notoriously bad at math,
17 so I wanted to make sure that that was correct.

18 A. And I'm -- and I'm feverishly trying to
19 figure it out as we speak. I do believe it would have
20 included 2016.

21 Q. Okay. What about the time period for the --
22 was a vice president of the Cobb Democratic Committee?

23 A. Let's see, that would have been -- when was
24 it? '14, '13, '12 -- I think '12 -- '11, and I think
25 the -- I think that's -- somewhere there is -- it

1 began.

2 Q. Somewhere in 2011?

3 A. Yes.

4 Q. Okay. And when did it end?

5 A. Last -- let's see, this is 2022. 2021 --
6 beginning of 2021. You know, don't hold this against
7 me, but I'd have to say this, give or take a year. I
8 don't have it written down.

9 Q. That's okay. I won't expect you to know the
10 exact dates.

11 And what made you want to leave the --
12 deposition?

13 A. I have -- I've been doing this type of work
14 I'd say for the last 25 years, and I -- January 10th, I
15 turn 78.

16 Q. Well, happy early birthday.

17 A. Thank you. And COVID and all of this other
18 stuff, all this community activity, and then -- okay.
19 And that's basically -- that's basically it.

20 Q. And what years were you vice president of the
21 Democratic Party Georgia African American Caucus?

22 A. Somewhere within the first -- first four
23 years of the time period that I gave you.

24 Q. Okay. Starting in 2011?

25 A. Somewhere in there, yes.

1 Q. Okay. Thank you. Have you ever participated
2 in any activities of the Democratic Party?

3 A. You'll have to repeat that.

4 Q. Have you ever participated in any activities
5 at the Democratic Party, other than these committees?

6 A. Activity such as?

7 Q. Voter registration drives, things like that.

8 A. For the DPG, as opposed to our local caucus.
9 Is that what you are asking me?

10 Q. Either one.

11 A. Yes. Voter registration is -- remains
12 steady.

13 Q. Okay. Can you think of any other activities?

14 A. No.

15 Q. Have you ever considered yourself to be a
16 member of the Republican Party?

17 A. No.

18 Q. Is it fair to say you generally support
19 Democratic candidates for election in Georgia?

20 A. Yes.

21 Q. Have you ever voted for a Republican
22 candidate?

23 A. Yes.

24 Q. Do you remember who?

25 A. I crossed over, and no, I don't remember. I

1 A. No.

2 Q. And you've already mentioned that you worked
3 on this one political campaign. Have you ever worked
4 on any other political campaigns?

5 A. I've supported candidates. I've held
6 different candidates in Cobb County running for office.

7 Q. How did you support them?

8 A. I would volunteer or donate.

9 Q. Do you remember which candidates in Cobb
10 County?

11 A. Almost every Democratic candidate that's run
12 starting -- you could take it back with some -- from
13 one -- it would be -- it would behoove you to
14 financially support a candidate. So a few dollars of
15 donation, that type of thing, or to pick up or to get a
16 yard sign or that type -- you know, or that type of
17 activity.

18 Q. All right. Moving onto the history of this
19 case. When did you first learn about this lawsuit?

20 A. Locally, I was -- my name was put in, and I
21 was recommended to consider being a part of it.

22 Q. Do you know what time period that was?

23 A. I'd say -- I really don't. Things have been
24 happening so fast, and particularly my situation with
25 my knee, I -- I'm just -- things have been a blur.

EXHIBIT I

Pendergrass, Coakley, et al. v. Raffensperger, Brad, Et Al.

Page 1

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

CASE NUMBER: 1:21-CV-05339-SCJ

COAKLEY PENDERGRASS, et al.,
PLAINTIFFS,

V.

BRAD RAFFENSPERGER, et al.,
DEFENDANTS.

DEPOSITION TESTIMONY OF:

ELLIOTT HENNINGTON

December 13, 2022

S T I P U L A T I O N S

IT IS STIPULATED AND AGREED by and
between the parties through their respective
counsel that the deposition of ELLIOTT
HENNINGTON may be taken before Mallory B.

1 A. No.

2 Q. And have you discussed this case
3 with anyone other than your lawyer?

4 A. No.

5 Q. Have you discussed this deposition
6 with anyone other than your lawyer?

7 A. No.

8 Q. Did you review anything prior in
9 preparation for this deposition?

10 A. Just discussion with my lawyer.

11 Q. And do you have any documents or
12 notes physically with you today?

13 A. No.

14 Q. And so we've got through that.
15 That's pretty easy. We'll shift gears again.
16 Could you just again state your full
17 name for the record.

18 A. Elliott Hennington.

19 Q. And, Mr. Hennington, what is your
20 current address?

21 A. [REDACTED] Powder Springs,
22 Georgia [REDACTED]

23 Q. And is it correct that that address

1 is in Cobb County?

2 A. Yes.

3 Q. And could you repeat that city name
4 one more time? Sorry.

5 A. That's okay. Powder Springs; Powder
6 Springs, Georgia.

7 Q. And how long have you lived at that
8 address in Powder Springs?

9 A. Since August of 2004.

10 Q. Since living at that address in
11 Powder Springs in August 2004, have you lived
12 or resided at any other address?

13 A. No.

14 Q. And where did you live before that
15 address in 2004?

16 A. Mount Holly, New Jersey.

17 Q. Did you say Mount Holly?

18 A. Yes, Mount Holly, New Jersey.

19 Q. And can you describe for us how --
20 the type of geographic region that Mount
21 Holly, New Jersey is?

22 A. South of New York, a little north of
23 Philadelphia, right off of the turnpike,

1 Q. Can you give a description of where
2 you voted?

3 A. Yes, at advance voting place at
4 south Ron Anderson building, recreation
5 center, in Powder Springs, New York.

6 Q. So you voted early?

7 A. Correct.

8 Q. And how about -- so -- sorry to --
9 to go back a little bit, was that in the
10 runoff or the most recent general election?

11 A. The last one was a special and a
12 runoff.

13 Q. And that was the one we were just
14 describing, right?

15 A. Correct.

16 Q. And then how about in the general;
17 do you remember which precinct you voted
18 there?

19 A. It would've been the same one.

20 Q. Same.

21 A. Same location.

22 Q. Let's shift a little bit.

23 Do you consider yourself to be a

1 member of the Democratic Party?

2 A. Yes.

3 Q. And for how long have you considered
4 that?

5 A. I guess ever since I been voting
6 regularly.

7 Q. So would that have been probably the
8 mid '70s?

9 A. Yes. More like the '80s.

10 Q. And have you ever held any
11 leadership position in the Democratic Party?

12 A. No.

13 Q. Have you ever held any position or
14 served on any committee in the Democratic
15 Party?

16 A. No.

17 Q. And have you participated in
18 activities of the Democratic Party?

19 A. No, no.

20 Q. And so is it safe to say that you've
21 never considered yourself a member of the
22 Republican Party?

23 A. Yes.

1 Q. And it would also be fair to say you
2 generally support Democratic candidates for
3 election in Georgia?

4 A. Yes.

5 Q. And so have you ever voted for a
6 Republican candidate?

7 A. Not to my knowledge.

8 Q. And we've kind of covered it
9 earlier, but just real quick, have you ever
10 been a member or held a position in
11 connection with any other political party?

12 A. No.

13 Q. Have you ever worked on any
14 political campaigns?

15 A. Yes.

16 Q. Which ones?

17 A. President Obama's campaign.

18 Q. And how would you describe your role
19 in working on that political campaign?

20 A. Just at one of the headquarters,
21 getting people registered to vote, opening
22 and closing the building, phone banking.

23 Q. And was that for both Obama

1 campaigns or just one?

2 A. More so the first one.

3 Q. But maybe a little bit with the
4 second one?

5 A. Yes.

6 Q. And, again, this is something we
7 covered a little bit earlier, but have you
8 had any type of involvement with voter
9 advocacy groups ever?

10 A. No.

11 Q. And so let's now shift to discussing
12 the lawsuit.

13 How did you first hear about the
14 lawsuit that you got involved with?

15 A. I was approached.

16 Q. And who were you approached by?

17 A. I guess my name was given to the --
18 to the law firm that's representing me.

19 Q. And can you describe the nature of
20 the initial contact that occurred?

21 MR. JONES: We'll just object to the
22 extent that this question seeks any
23 information that's covered by the

EXHIBIT J

Pendergrass, Coakley, et al. v. Raffensperger, Brad, Et Al.

Page 1

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

COAKLEY PENDERGRASS, et al.,

Plaintiffs,

v.

Civil Action File

BRAD RAFFENSPERGER, et al.,

No:

Defendants.

1:21-CV-05339-SCJ

VIDEOCONFERENCE DEPOSITION OF

ROBERT RAY RICHARDS

DATE: Monday, December 5, 2022

TIME: 1:08 p.m.

LOCATION: Remote Proceeding

Powder Springs, GA [REDACTED]

REPORTED BY: Daniel Almekinder, Notary Public

JOB NO.: 5609279

1 discussed with your attorney.

2 So I just want to make sure that you know
3 that I'm not referring to that. It's just simply --
4 because I would understand that you spoke with your
5 lawyer before the deposition. Would that be correct?

6 A Yes.

7 Q Did you speak with anyone else outside --

8 A I have not.

9 Q Okay. Have you made any notes or memos or
10 documents -- or written documents or electronic
11 documents that relate in any way to this case?

12 A No.

13 Q You mentioned earlier, Mr. Richards, that
14 you live on [REDACTED] in Powder Springs; is that
15 correct?

16 A Yes. It's hard to say. Yes.

17 Q Okay. I know. I almost said [REDACTED] but I
18 can see that it's [REDACTED].

19 And how long have you lived at that address?

20 A 2016. June 2016.

21 Q And that address is in Powder Springs;
22 correct?

23 A It is, yes.

24 Q And in Cobb County; correct?

25 A Yes.

1 I can just give you the -- the -- we -- the center off
2 Dallas Highway. Ron Anderson. So we can vote in
3 varying locations when you early vote, as you know, as
4 long as it's in the county. So we just go to
5 different locations depending on what the wait time is
6 because you -- there's an app, and you can see the
7 wait time.

8 Q So do you think in November 2022, that you
9 voted at the location off of Dallas Highway that you
10 described -- the Ron Anderson --

11 A I'm pretty -- I'm pretty sure I did, yeah.

12 Q And for the runoffs tomorrow, I understand
13 that you -- did you vote early for that election?

14 A I've already voted, yes.

15 Q And where did you vote for the -- tomorrow's
16 runoff election?

17 A The one over by Tapp Middle School, my
18 daughter's middle school. I may have the name
19 confused, but it's over by Tapp Middle School, and
20 it's in Powder Springs.

21 Q Do you consider yourself a member of the
22 Democratic Party?

23 A I do.

24 Q How long have you been a member of the
25 Democratic Party?

EXHIBIT K

1 had with your attorney under the attorney-client
2 privilege -- but did that review help refresh your
3 recollection as to the events that you will testify to
4 here today?

5 A Not really refresh. I'm very aware of
6 what's going on. So, no.

7 Q And do you have any documents or notes with
8 you today?

9 A No, I do not.

10 Q And shifting gears again, Mr. Rueckert,
11 could you please state your full name for the record.

12 A Jens Wolfgang Rueckert.

13 Q And, Mr. Rueckert, what is your current
14 address?

15 A [REDACTED] Powder
16 Springs, Georgia [REDACTED]

17 Q And what county is that in?

18 A Cobb County. West Cobb.

19 Q And how long have you lived at that address?

20 A We moved in in December of 2014.

21 Q And have you lived anywhere else in the past
22 two years?

23 A In the past how many years?

24 Q Two years.

25 A No, sir, I have not.

1 Q And where did you live before moving to the
2 address that you just described?

3 A We lived approximately six months in Canton,
4 Georgia, Cherokee County, while the house was being
5 built. I was a schoolteacher at Cherokee High School
6 after I retired out of the United States Air Force.

7 Q And how long have you lived in Cobb County?

8 A Since December of 2014.

9 Q And have you ever resided in any other
10 county in Georgia?

11 A No.

12 Q You mentioned this -- or may have alluded to
13 this a little bit earlier, but why did you move to
14 Cobb County?

15 A I retired out of the Air Force and my eldest
16 daughter lived in Georgia, so we decided to retire
17 closer to her.

18 Q And I'm going to presume based on your
19 experience serving in the Air Force, but have you ever
20 resided in any other state?

21 A Yes, sir.

22 Q And -- and what are all those, to the best
23 of your recollection?

24 A Well, let's see. I was born in Germany. I
25 moved to North Carolina when I was almost five years

1 old, and I continued in North Carolina until 1991 when
2 I graduated high school. In August of 1991 I shipped
3 off to Lackland Air Force Base in San Antonio, Texas,
4 and I was there for basic military training. And then
5 I went to Sheppard Air Force Base, Texas, in Wichita
6 Falls, and I was there for about five months for
7 pharmacy training. And then I went to Fort Worth,
8 Texas, for my first assignment for about a year and a
9 half at Carswell Air Force Base.

10 I moved to Shaw Air Force Base in South
11 Carolina in 1993, and I stayed at Shaw Air Force Base
12 until 1999, and then I went back to San Antonio,
13 Texas, at Lackland Air Force Base and was a military
14 training instructor, drill sergeant. And then I went
15 to Wright-Patterson Air Force Base in Ohio from 2003
16 to 2007. And then we went back to Lackland Air Force
17 Base in San Antonio, Texas, where I was superintendent
18 of the pharmacy at Wilford Hall Medical Center. And
19 then in 2012 I went to Alaska, Elmendorf Air Force
20 Base, Anchorage, Alaska, and I was there until June of
21 2014 when I retired. And I was the Pacific Air Force
22 functional manager of pharmacy there, where I managed
23 pharmacies in Alaska, Hawaii, Guam, Japan, and Korea.

24 Q And we will get into your work experience a
25 little bit, but thank you so much for that background.

1 That will be very helpful for my later questions.

2 But real quickly, since this deposition is
3 occurring virtually, can you provide the address that
4 you are testifying from.

5 A [REDACTED] Powder Springs, Georgia

6 [REDACTED]

7 Q So that would be the home address that you
8 provided previously; correct?

9 A Correct. I am in my office.

10 Q Okay. And is your lawyer physically present
11 with you right now?

12 A No, he is not. He is virtually present.

13 Q And is anyone else physically present with
14 you in the room?

15 A Not in the room, no. But in the home, yes.

16 Q And do you own, either partially or full,
17 any other properties?

18 A No, I do not.

19 Q Do you rent anywhere else?

20 A No, I do not.

21 Q And have you owned any other rental
22 properties in the last two years?

23 A No, I have not.

24 Q So it would be fair to say that the
25 residence that you've identified in Cobb County is

1 your sole residence?

2 A That is correct.

3 Q And now we will shift gears a little bit and
4 talk about your education. Mr. Rueckert, what was the
5 highest level of education that you've completed?

6 A I have a master's in health administration.

7 Q And when did you receive that?

8 A 2009.

9 Q And where did you receive that from?

10 A University of Phoenix.

11 Q And aside from the master's in health
12 administration, what is the next level -- next highest
13 level of education that you've completed?

14 A I have a bachelor's in Health and Human
15 Services.

16 Q And when did you receive that?

17 A 2006.

18 Q And where did you receive that from?

19 A Wilberforce University in Ohio.

20 Q And have you -- strike that.

21 Have you completed any other university or
22 graduate-level schooling with institutions other than
23 those that we've described?

24 A Yes. I have an associate's degree in
25 pharmacy technology from the Community College of the

1 Q Ohio?

2 A I don't recall voting in Ohio either.

3 Q And then how about back when you first
4 registered in North Carolina, did you vote in North
5 Carolina?

6 A No, actually I wasn't there long enough.

7 Q Understandable. And now we will shift along
8 to political affiliations. Do you consider yourself
9 to be a member of the Democratic Party?

10 A Yes.

11 Q And for how long have you considered
12 yourself to be a member of the Democratic Party?

13 A Since I was old enough to vote, 18.

14 Q And have you ever held any leadership
15 position in the Democratic Party?

16 A No, I have not.

17 Q Have you ever held any position or served on
18 any committee in the Democratic Party?

19 A No, I have not.

20 Q Have you participated in any activities in
21 the Democratic Party?

22 A Yes.

23 Q And to the best of your recollection, can
24 you describe what those activities were.

25 A I remember a few summers ago when

1 Representative Wilkerson hosted a barbecue fun day at
2 a local park. I don't recall the name of the park.
3 And then most recently when Representative Wilkerson
4 had Candidate Marcus Flowers over at his house prior
5 to the election.

6 Q And so would that have been for the
7 November 2022 election that that event was associated
8 with?

9 A Yes.

10 Q And I think you probably touched on this
11 prior, but have you ever considered yourself to be a
12 member of the Republican Party?

13 A No.

14 Q So would it be fair to say that you
15 generally support Democratic candidates for election
16 in Georgia?

17 A Yes.

18 Q And have you ever voted for a Republican
19 candidate?

20 A I don't recall ever voting for a Republican.

21 Q And have you ever been a member or held a
22 position in any other political party?

23 A No, I have not.

24 Q And aside from what you described previously
25 with Representative Wilkerson, have you worked on any

EXHIBIT L

Pendergrass, Coakley, et al. v. Raffensperger, Brad, Et Al.

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

COAKLEY PENDERGRASS, et al.,)

)

Plaintiff,)

)

vs.)

) CIVIL ACTION FILE

) NO. 1:21-CV-05339-SCJ

BRAD RAFFENSPERGER, et al.,)

)

Defendants.)

)

Deposition of Ojuan Glaze

December 14, 2022

10:08 a.m.

Remote via Zoom technology

Reported by: Carla J. Hopson, RPR, CCR-1816

1 Q And what is -- what is your current
2 address?

3 A My current address is [REDACTED]
4 [REDACTED]. That's going to be Douglasville, Georgia,
5 [REDACTED]

6 Q And how long have you lived at that
7 address, sir?

8 A Five years.

9 Q How long have you lived in Douglas
10 County?

11 A Off and on seven years.

12 Q What was your address prior to your
13 current address in Douglas County?

14 A The whole address?

15 Q Yes.

16 A [REDACTED]. I want to say
17 [REDACTED] Marietta, Georgia.

18 Q And was that address in Cobb County?

19 A Cobb County, yes.

20 Q Okay. Let me ask you a couple more
21 questions. So are you originally from Georgia?

22 A I am.

23 Q And where in Georgia were you born just
24 generally?

25 A Mableton, Georgia.

1 Q And I think you mentioned that while you
2 were at Tuskegee you had registered to vote in
3 Alabama; is that correct?

4 A That's correct.

5 Q Other than the voting in Alabama while
6 you attended Tuskegee, have you ever voted in any
7 other state other than Georgia?

8 A No.

9 Q Do you consider yourself to be a member
10 of the Democratic party?

11 A I do.

12 Q And since when would you consider
13 yourself to be a member?

14 A Ever since I've been voting.

15 Q So when you say that began?

16 MR. JONES: Objection. Asked and
17 answered.

18 You may answer.

19 A I want to say 2012.

20 Q Have you held any leadership positions
21 with the Democratic party?

22 A No.

23 Q Have you ever served on any committees
24 or held any position with the local Democratic party
25 in Douglasville?

1 A No.

2 Q Have you ever considered yourself to be
3 a member of the Republican party?

4 A No.

5 Q Is it fair to say that you generally
6 support Democratic candidates for election in
7 Georgia?

8 A I support candidate that support my
9 views.

10 Q Have you ever voted for a Republican
11 candidate?

12 A I have.

13 Q I'm sorry. Did you say I have not or I
14 have?

15 A I have.

16 Q And what Republican candidates have you
17 voted for?

18 A I cannot remember. I just know that
19 that was the only person on the ballot for that
20 particular spot that was being elected.

21 Q Other than voting for a Republican
22 candidate when that was the only candidate listed on
23 the ballot, have you voted for any other Republican
24 candidate?

25 A I have not.

EXHIBIT M

Grant, Annie Lois, et al.v. Raffensperger, Brad, E

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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 ANNIE LOIS GRANT, et al.,

5 Plaintiffs,

6 v.

CIVIL ACTION FILE
NO. 1:22-CV-00122-SCJ

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

11 Defendants.

12 COAKLEY PENDERGRASS, et al.,

13 Plaintiffs,

14 v.

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

15 BRAD RAFFENSPERGER, et al.,
16 Defendants.

17 VIDEOTAPED ZOOM DEPOSITION OF
18 MAXWELL PALMER, Ph.D.

19 February 22, 2023

20 9:28 A.M.

21 Lee Ann Barnes, CCR-1852B, RPR, CRR, CRC
22
23
24
25

1 referring to the races, the context -- the election
2 contests that you analyzed, he says "In all 40
3 contests, the candidate of choice of black voters is
4 the Democrat and the candidate of choice of white
5 voters is the Republican."

6 Do you see that?

7 A. Yes.

8 Q. And on page 5 -- and do you agree with
9 that analysis, by the way, or that synopsis --

10 A. Yes.

11 Q. -- of your report?

12 Okay. So at 5 he sums up what I believe
13 is his view on -- as to the scope or, I guess,
14 meaning of your analysis. And let me see -- it's at
15 the beginning of the second paragraph of page 5.

16 It says "In short, all that Dr. Palmer's
17 analysis demonstrates is that black voters provide
18 uniformly high levels of support for Democratic
19 candidates and white voters provide uniformly high
20 levels of support for Republican candidates."

21 Do you see that?

22 A. Yes.

23 Q. Do you agree with that?

24 A. I think that is accurate, but that's also
25 the full point of the analysis, is to show if black

1 and white voters are supporting different
2 candidates.

3 Q. And you would also agree that, as
4 Dr. Alford goes on to say, that "There is no
5 indication in these EI results that the high levels
6 of black voter support for Democratic candidates is
7 connected in any meaningful way to the race of the
8 Democratic or Republican candidates"; right?

9 A. I agree there's no difference or no
10 significant difference in the vote shares of white
11 voters for Republican candidates based on the race
12 of the candidate.

13 Q. And would you -- I'm sorry.
14 Could you say that again?

15 A. I agree that there's no meaningful
16 difference in the level of white voter support for
17 the Republican candidate based on the race of the
18 candidate.

19 Q. And you agree that there's no indication
20 in your results that the high levels of white
21 support for Republican candidates is connected in
22 any meaningful way to the race of the Democratic or
23 Republican candidates?

24 A. I'm not sure what "any meaningful way"
25 means, but I would say in any statistically

1 question, for the record.

2 BY MR. JACOUTOT:

3 Q. So let me ask you this: What is your
4 standard for determining racial polarization?

5 A. So determining racial polarization, to me,
6 comes in three parts.

7 First, I have to see if -- and just to
8 simplify, just for black and white voters as I'm
9 looking for here. If black voters vote
10 cohesively -- that is, do they -- do the large
11 majority of the black voters support the same
12 candidate -- then do white voters vote cohesively,
13 do a large majority of white voters support the same
14 candidate, and then are they different candidates or
15 not. So you first have to have a candidate of
16 choice for each group and then those have to be
17 different candidates.

18 Q. Okay. And how do you -- how do you define
19 cohesively as used in that standard?

20 A. I don't have a bright-line test. Here the
21 results are unambiguous regardless of any cutoff you
22 might want to use.

23 Q. And you didn't examine any primary data in
24 your analysis; right? It was strictly limited to
25 general elections and runoffs, I believe.

1 A. That's correct.

2 Q. Okay. Do you know if there's a -- and
3 this is just for how you operate personally in this
4 area.

5 But do you know if there is a cutoff, like
6 or a threshold level of support that you need to
7 achieve in order to find -- in order for you to find
8 that a -- a group voted cohesively in a given
9 election?

10 A. I don't have a bright-line cutoff.

11 Q. If a group voted 55 percent for the same
12 candidate, would you -- would you find that to be
13 cohesive voting of that group?

14 A. Generally weakly cohesive or not cohesive.

15 Q. Okay. And if there's weak cohesion --

16 A. Sorry. I -- I would say that's not
17 cohesive.

18 Q. Okay. What about 60 percent?

19 Have you ever seen a -- examined an
20 election contest where an indiv- -- a group that you
21 were analyzing voted 60 percent for a candidate -- a
22 given candidate, would you -- have you ever said
23 that that was sufficiently cohesive, in your
24 opinion, for your -- for purposes of your racial
25 polarization analysis?

EXHIBIT N

2/23/2023

Coakley Pendergrass, et. al., v. Brad Raffensperger, et. al.

Dr. John Alford

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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 Dr. Palmer's expert report?

2 A It certainly -- I think it certainly goes
3 to some part of my discussion of Dr. Palmer's
4 report, but I would say it is primarily as a sort
5 of adjunct to the discussion of primaries in
6 Dr. Handley's report.

7 Q Okay. So in terms of your analysis of
8 Dr. Palmer's findings and conclusions, you
9 primarily relied on the analysis and data that he
10 himself provided in his report; Is that fair?

11 A So that's correct. But I'm also making
12 the point that because he has no primary analysis,
13 we really don't have anything other than the
14 general election setting to look at. And so I
15 think that's important to understand what we know
16 in that setting, although it's not in his report,
17 we can get that from, you know, sort of
18 comparable -- for time frame that's comparable
19 from Dr. Handley's report and my analysis of the
20 Republican primary, but it's not analysis that's
21 in my report as sort of checking his analysis,
22 something like that, because it's not analysis

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Dr. John Alford

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1 that he does in his report.

2 Q Okay. So earlier you had mentioned that
3 in preparation for working on this case, you --
4 I'm not sure if you said, used the verb
5 "downloaded," but you procured more updated
6 election data as you -- in preparation for your
7 work in this case. Do you recall saying something
8 to that effect?

9 A Yes.

10 Q And then here, though, you specify that
11 you relied on the election and demographic data
12 provided by Dr. Palmer and Dr. Handley other than
13 the 2022 Republican primary data; is that right?

14 A That's correct.

15 Q So I guess my question is: Did you, in
16 your response to Dr. Palmer's report in
17 particular, did you utilize any data other than
18 the data that Dr. Palmer himself relied on
19 preparing his report?

20 A No.

21 Q Okay.

22 A The purpose of kind of preloading some of

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Dr. John Alford

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1 black candidate, they could be elected. So if
2 blacks prefer to be elected -- or represented by a
3 black, the Voting Rights Act provided a mechanism
4 so that can happen rather than that choice always
5 being blocked.

6 Somebody someplace said this, that blacks
7 can have any candidates they want, as long as that
8 candidate was white. That was true throughout the
9 south, right. You could have any candidate you
10 wanted as black voters as long as the candidate
11 was white.

12 That's what we're trying to address here,
13 provide an equal footing in which if black voters
14 prefer a black candidate, they can elect that
15 candidate rather than just electing a white
16 candidate. So I just think that's a fundamental
17 question.

18 And what this data shows is that, it is
19 the case that black candidates that are supported
20 by black voters face exactly the same or produce
21 exactly the same voting pattern as do white
22 candidates favored by black voters. And so that's